

GRAHAM CORPORATION

CODE OF VENDOR CONDUCT

ADOPTED: May 30, 2023

Introduction

This Code of Vendor Conduct applies to the vendors, suppliers and other business partners of Graham Corporation, and each of their employees, agents, and suppliers (collectively, “Vendors”). Vendors who violate this policy may be subject to the termination of their business relationship with Graham.

Our Commitment

We are committed to conducting business in an ethical and responsible manner and expect that our Vendors will do the same. We have adopted this Code to specify the behaviors, practices and regulations we expect to see practiced in all stages of our supply chain. This Code is focused on ensuring that our Vendors act in a way that is ethical, corporately responsible, and aims to promote compliance with applicable laws and regulations.

Legal Compliance

In addition to these responsibilities, Vendors must comply with all applicable laws, legal regulations, directives, and guidelines, and all obligations in any contract a Vendor may have with us.

Employment Standards

Labor Practices

Vendors will not use forced or involuntary labor, slave labor, child labor, or engage in human trafficking and will comply with all applicable labor laws including, but not limited to, those regarding working conditions, wages, working hours, overtime hours, hiring, and benefits.

No Discrimination or Harassment

Vendors will not practice or tolerate any discrimination or harassment of any kind. This includes but is not limited to discrimination or harassment based on race, color, religion, sex, national origin, age, disability, sexual orientation, gender identity or any other status protected by applicable laws, rules or regulations.

Health and Safety

Vendors shall provide their employees a safe and healthy working environment. Vendors are responsible for maintaining a safe and healthy workplace by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices, or conditions. Vendors shall not permit violence or any threatening behavior.

Environmental

Vendors shall conduct their operations in a way that ensures compliance with all applicable environmental laws and regulations.

Ethical Standards

Recordkeeping

Vendors shall perform honest and accurate record keeping practices in compliance with applicable accounting standards. Records should be retained based on the applicable retention requirements.

Confidentiality

Vendors shall maintain and protect all confidential or proprietary information provided by us and our respective business partners, and use it only for the purposes for which it is provided.

Competition and Fair Dealing

Vendors shall abide by all applicable anti-corruption laws and regulations of the countries in which it operates, including the Foreign Corrupt Practices Act and applicable international anti-corruption conventions. Vendors shall not engage in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. Vendors shall compete fairly and honestly and seek competitive advantages through superior performance and products, not through unethical or illegal business practices.

Conflicts of Interest

Vendors shall avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. Vendors are expected to provide notification to all affected parties if an actual or potential conflict of interest arises.

Observing the Policy

Each Vendor shall have appropriate policies and procedures in place to enable it to fully comply with this Code. These policies and procedures need not be identical to this Code, but as a minimum they must be consistent with its principles. Vendors shall ensure that documentation is kept to demonstrate compliance with this Code and must provide access to that documentation upon our request. Vendors shall use reasonable efforts to promote compliance with this Code among its suppliers and supply chain.

Reporting

Vendors will inform us if the Vendor becomes aware of any actual or potential breach of this Code by any person or business.