**Human Trafficking Policy**

Haynes International, Inc. ("Haynes") is committed to conducting business with honesty and integrity wherever we operate around the world, treating all people with dignity and respect and complying with all applicable laws, regulations and treaties.

We are also committed to protecting and promoting human rights globally. We do not tolerate illegal child labor, forced labor or any use of force or other form of coercion, fraud, deception, abuse of power or other means to exploit people. We respect international principles of human rights – including, but not limited to, those in the UN Declaration of Human Rights, the Trafficking Victims Protection Act, as amended, the UK Modern Slavery Act of 2015 and the California Supply Chain Transparency Act – and embody these principles and commitments in our corporate policies and our Code of Business Conduct and Ethics. We comply with the employment laws of every country in which we operate and expect those with whom we do business to do the same. We have included on our website this Policy and Statement and our Purchase Order Terms and Conditions, which address the issue. These documents make our commitments more public and ensure our stakeholders know the standards we apply to ourselves and expect from all of our business partners. Additionally, we have adopted a Code of Conduct for Suppliers and Third Party Intermediaries which applies to vendors, contractors and service providers of any kind. We provide notification to all suppliers confirming we require them to follow its standards through our standard Purchase Order terms and conditions. We also draft supply agreements to require an affirmative commitment from suppliers to comply with our Supplier Code.

This Policy prohibits employees and agents from, among other actions:

- Engaging in all forms of human trafficking and forced labor;
- Withholding employee identity or immigration documents;
- Using recruiters that do not comply with labor laws of the country in which the recruiting takes place;
- Charging employees recruitment fees[(1)];
- Requiring deposits from employees unless required by applicable law;
- Restricting freedom of movement or right to terminate employment;
- Making loans to workers or job seekers under circumstances where repayment terms could be construed as debt bondage or forced labor;
- Taking disciplinary action for refusing overtime in excess of what is contemplated, required or permitted pursuant to a binding and enforceable collective bargaining agreement;
- Setting production quotas at such a level that employees need to work beyond regular working hours (excluding overtime) to earn the legal minimum wage or prevailing industry wage;
- Having direct control of, or access to, employees' bank accounts other than to make direct deposits of compensation;
- Procuring commercial sex acts; and
- Paying wages that do not meet applicable host country legal requirements or prevailing industry wages.

The following information is included in response to applicable legislation requiring certain disclosures from Haynes regarding our actions with respect to human trafficking in our supply chain:

**Verification.** We conduct a supplier approval process to identify, assess and manage risks associated with suppliers. We consider product quality, transaction types, specific products we purchase and the geographic locations from which we source commodities, along with other relevant business and legal criteria. We follow the trade laws and applicable laws of countries in which we operate, including restrictions on exports and on doing business with certain people,

companies or countries. We require suppliers to accept and comply with this Policy through our Purchase Order Terms and Conditions.

**Auditing.** We have audit rights in many of our supply contracts and in our Purchase Order Terms and Conditions, which permit us to audit supplier compliance with certain contract terms. While we have certain contractual rights to audit suppliers and have conducted routine audits or assessments of their performance, those assessment methodologies do not currently include a focus on human trafficking and slavery.

**Certification.** Our Purchase Order Terms and Conditions require suppliers to comply with all applicable laws. Through our Code of Conduct for Suppliers and Third Party Intermediaries, the Purchase Order Terms and Conditions also require suppliers to comply with that code. New, renewed or amended contracts with suppliers will also include updated compliance language requiring a contractual commitment by suppliers to comply either with our Supplier Code or their own company code of conduct, if it expresses comparable standards and meets with our approval. Also, with every contract, suppliers will be required to commit in writing that they will require the same level of compliance from their own suppliers. Suppliers who do not agree to these terms, if we do not replace them immediately, will be flagged, monitored and reviewed until we make a business decision about their status. We do not obtain certifications from third-party auditors.

**Internal Accountability.** Everyone who is part of our business community, whether employees, contractors, agents or suppliers, will be held accountable to conduct business with or for us in an ethical manner. Our employees are required to follow all laws of the countries in which they operate and all of our policies and procedures, including our Code of Conduct, various business rules, policies and standard operating procedures. Employees who violate laws or company policies are subject to disciplinary action, up to and including termination. Similarly, suppliers must comply with the terms of our Purchase Order Terms and Conditions and any applicable written contracts. If they fail to comply with the law or do not address contractual non-compliance in a timely manner, we reserve our contractual rights to terminate relationships with them if applicable. As part of our developing supply chain sustainability program, we plan to continue to develop processes and procedures that hold suppliers accountable in all areas, including labor sourcing. Employees and others may use our whistleblower hotline to report any violations related to human trafficking.

**Training and Awareness.** We regularly train our employees in the standards of ethical behavior, policies, procedures and legal requirements that apply to our business. We have also specifically informed our supply chain and sourcing employees about human trafficking and slavery. In addition, we currently include training on human trafficking and slavery as part of our regular training program.

[1] **Recruitment Fees**

Recruitment fees include financial obligations assessed against employees or potential employees, associated with the recruiting process:

(i) For soliciting, identifying, considering, interviewing, referring, retaining, transferring, selecting, testing, training, providing new-hire orientation, recommending, or placing employees or potential employees;

(ii) For covering the cost of advertising;

(iii) For any activity related to obtaining permanent or temporary labor certification;

(iv) For processing petitions;

(v) For visas and any fee that facilitates an employee obtaining a visa (ex: appointment and application fees);

(vi) For government-mandated costs (ex: border crossing fees);

(vii) For procuring photographs and identity documentation (ex: non-governmental passport fees);

(viii) Charged as a condition of access to the job opportunity, including procuring medical

examinations and immunizations and obtaining background, reference and security clearance checks and examinations; additional certifications;
(ix) For an employer's recruiters, agents or attorneys, or other notary or legal fees; and
(x) For language interpreters or translators.
Any financial obligation may be a recruitment fee regardless of whether the payment is in property or money, deducted from wages, paid back in wage or benefit concessions, paid