

The M2Graphite Code of Conduct

M2Graphite employees share a commitment to safety, integrity, and innovation. We seek to create a meaningful and lasting impact and are committed to always acting honestly, ethically, and in compliance with laws.

Employees are committed to the following minimum requirements:

Health & Safety: Every individual shares the responsibility for implementing M2Graphite's safety policy.

M2Graphite takes any safety concerns seriously and requires employees to report any issue or concern immediately.

Quality: M2Graphite's customer-first mindset is built on innovation and continuous improvement. We prioritize quality in our products and services and require employees to report actual or potential quality problems.

Environment: M2Graphite is committed to environmental stewardship. We support sustainable business practices and seek to reduce our carbon footprint. M2Graphite complies with all applicable laws and regulations protecting the environment. Employees are expected to speak up and report any activity that could have a negative impact on the environment.

Compliance with Laws: It is Company policy to conduct business in accordance with all applicable laws.

M2Graphite employees are required to know and comply with the laws and regulations that relate to the performance of their job.

Conflicts of Interest: Any interest which prevents M2Graphite employees from working objectively and effectively must be avoided. Employees should not do business in a manner that personally benefits them or a family member, unless approved by their manager.

Employment Conditions: M2Graphite employees are to respect their fellow employees and treat them as they expect to be treated. Discrimination and harassment will not be tolerated, nor will intimidating, abusive, threatening or violent behavior. The possession, use, or sale of an illegal drug or alcohol on Company premises is prohibited. Employees are entitled to a safe work environment and they should report any condition that jeopardizes their or a fellow employee's safety.

Confidentiality: M2Graphite employees are not to disclose Company confidential or proprietary information to third parties unless disclosure serves a legitimate business purpose and is preceded by the execution of a confidentiality agreement by the receiving party. If in doubt whether information is confidential or proprietary, check with a supervisor or management before disclosure.

Gifts and Entertainment: M2Graphite employees are not to give or receive expensive or otherwise inappropriate gifts and entertainment in connection with their employment. Employees may extend and accept infrequent invitations, provided there is a business purpose being served, the amount is reasonable, and the setting is appropriate.

Fair Competition: M₂Graphite employees are required to know and comply with applicable antitrust and other competition laws. No price fixing, bid rigging, market allocation or other anti-competitive conduct will be allowed. Employees are expected to compete vigorously yet fairly in the marketplace.

Company Assets: All Company assets including electronic equipment and digital assets are to be protected and used for business purposes.

Bribery: M₂Graphite employees are not to offer bribes or other incentives in exchange for favorable treatment of the Company. Public officials and private customers are not to be offered extravagant gifts, entertainment, unearned rebates or credits for doing business with the Company. Do not do business with any party known or suspected to be involved in illicit business. Business transactions involving significant amounts of cash are prohibited.

Accounting: Financial reports are to be accurate, complete, timely, and representative of the Company's position.

Reporting Violations: You are encouraged to report any perceived violation of any of the Code of Conduct Positions set forth above. Reports can be made to management or emailed to compliance@m2graphite.com; or reported anonymously at www.m2graphite.com/speakup.

To whom and how you report is based upon the circumstances and your comfort level. There will be no retaliation permitted against anyone who makes a report in good faith.