



## **Supplier and Vendor Code of Conduct**

SunCoke is committed to operating its business in an ethical and responsible manner and partnering with suppliers and vendors to develop sustainability performance in its supply chain. We expect our suppliers and vendors to adhere to recognized environmental, social and corporate governance (“ESG”) standards and use best efforts to implement such standards with their suppliers and subcontractors.

SunCoke’s suppliers and vendors are expected to abide by SunCoke’s Code of Conduct and Business Ethics and the principles set forth in this Supplier and Vendor Code of Conduct when working with us.

Suppliers should report potential violations of any Code of Conduct immediately to SunCoke. Reports can be made through our confidential hotline by telephone at (877) 918-1997 or through the website at <https://suncoke.alertline.com>.

## **Compliance, Ethics & Integrity**

It is SunCoke’s policy to act as a good corporate citizen of the countries and localities in which we operate. We expect our suppliers to comply with all applicable laws and regulations and operate their businesses in an ethical manner.

SunCoke expects its suppliers and vendors to:

- Maintain accurate books and records in compliance with applicable laws, regulations, contractual obligations and accounting standards;
- Comply with applicable national and international trade laws and regulations, and:
  - avoid agreements or actions that illegally restrain trade, restrict competition, or otherwise violate antitrust and competition laws;
  - prohibit transactions with individuals, entities, or countries subject to restricted party or embargoed country lists;
  - forbid gifts to private or public officials to influence business decisions or otherwise encourage them to act contrary to the obligations of their office;
  - prohibit bribery, corruption, money laundering, or other fraudulent business practices;
- Avoid interactions with SunCoke employees that may conflict, or appear to conflict, with that employee’s acting in the best interest of SunCoke;
- Ensure compliance with laws and directives relating to the protection, transfer, access, and storage of personal information; and
- Protect SunCoke’s confidential information and intellectual property to prevent misuse (including possible insider trading), theft, or improper disclosure.

## **Environment, Health & Safety**

SunCoke expects its suppliers and vendors to: (i) comply with applicable occupational health and safety laws and regulations; (ii) create a safe workplace for their employees; and (iii) use appropriate management systems designed to ensure compliance with applicable safety requirements.

SunCoke also expects its suppliers and vendors to comply with applicable environmental regulations, including those relating to hazardous materials, raw materials, wastewater, and solid waste and air emissions. SunCoke's suppliers and vendors must aim to reduce the environmental impact of their business operations and promote the sustainability of natural resources.

## **Social Matters & Human Rights**

SunCoke expects its suppliers and vendors to:

- Protect the human rights of their employees and not use forced, involuntary, or compulsory labor (including prison labor, indentured labor, bonded labor, or slave labor);
- Comply with applicable laws and regulations governing wages, benefits and working hours, including laws regarding child labor and the minimum age of employees;
- Respect their employees, treat them fairly and promote a work environment that values diversity and is free from unlawful harassment, harsh or inhumane treatment, discrimination, violence and threats of violence, or coercion;
- Uphold their employees' rights to freedom of association and collective bargaining in accordance with applicable laws;
- Enable their employees and other stakeholders to report concerns or potentially unlawful practices at the workplace through a transparent, responsive, anonymous, unbiased, and confidential complaints mechanism through which they can report violations of supplier policies, expectations contained in this Supplier and Vendor Code of Conduct, other workplace grievances, or legal or ethical violations; and
- Confirm that products supplied to SunCoke do not contain materials derived from minerals originated from conflict regions that finance or benefit armed groups. SunCoke expects its suppliers and vendors to provide all necessary information to facilitate reasonable country of origin inquiries and due diligence.

Ensuring the principles of sustainable development in our supply chain is important to SunCoke. Our suppliers and vendors should implement an appropriate compliance management system to facilitate compliance with applicable laws, regulations, and standards. SunCoke reserves the right to conduct audits or assessments to monitor compliance with this Supplier and Vendor Code of Conduct and may discontinue its relationship with any supplier or vendor that fails to correct violations, or otherwise displays a pattern of non-compliance.