

## CONFLICT MINERALS POLICY

**Policy Statement:** In August of 2012, the U.S. Securities and Exchange Commission (“SEC”) adopted final rules to implement reporting and disclosure requirements related to “conflict minerals” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. GrafTech adheres to the highest standards of ethical conduct and will comply with the Conflict Minerals Rule (“CM Rule”) as it applies to the activities of the Company and its personnel. We also expect our business partners, in this case our suppliers, to adhere to these standards as well as to the Conflict Minerals Rule.

**Procedure Statement:** If the Company determines that a Conflict Mineral is “necessary to the functionality or production of a product” that it manufactures or contracts to be manufactured, the Company has a reporting and disclosure obligation under the CM Rule. The Company must submit an annual report to the SEC on Form SD (Specialized Disclosure Report) no later than May 31 after the end of the Company’s most recent calendar year (or the next business day if May 31 falls on a Saturday, Sunday or holiday where the SEC is not open for business). An executive officer of the Company must sign the report on behalf of the Company.

**Purpose of the CM Rule:** The CM Rule was adopted by the SEC in an effort to end human rights abuses caused by armed groups engaged in mining operations in the Democratic Republic of the Congo (DMC) or an adjoining country. The intent of the CM Rule is to force companies to disclose information about its source of conflict minerals to encourage them to source responsibly from this region and reduce funding for armed groups.

**Applicability:** The CM Rule applies to SEC reporting companies that manufacture products or contract to manufacture products that contain Conflict Minerals that are “necessary to the functionality or production” of that product.

### Definitions:

**Conflict Minerals:** The term “Conflict Minerals” is defined as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives which are limited to tantalum, tin and tungsten, unless the U.S. Secretary of State determines that additional derivatives or any other mineral or its derivatives are financing conflict in the DRC Region.

**DRC Region:** Angola, Burundi, Central African Republic, Democratic Republic of the Congo (DRC), Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia

**Recycled or Scrap Sources:** Conflict Mineral made from recycled metals which are reclaimed end-user or post-consumer products or scrap processed metals created during product manufacturing. Includes excess, obsolete, defective, and scrap metal materials that contain refined or processed metals that are appropriate to recycle in the production of tin, tantalum, tungsten and/or gold. Minerals partially processed, unprocessed, or a bi-product from another ore is not included in this definition.