Sustainability In Motion

A Message from GrafTech CEO, Craig Shular

Sustainability is a very important part of GrafTech's culture. From the Board of Directors to each and every employee, we are committed to sustainable and continued development for the safety, security and the well-being of our staff, their families and our communities. We seek to conduct our business in a manner that helps resolve the risks and threats to the sustainability of our social relations, environment and economies.

At GrafTech, safety and other compliance has always been and will remain a mission critical strategy as we advance into the future. With incentive compensation and bonuses dependent upon compliance with and continuous improvement in our programs, it has become part of our culture to embrace it as a way of life at GrafTech. Our commitment to sustaining our practices through strict policies and procedures will enable us to maintain our exemplary safety records and allow us to continue on a forward-thinking sustainability path.

2012 Sustainability Update

In January 2011, we presented to you our initial formal report on our sustainability initiatives. Our initial goal included supplementing our existing communications with a focus on GrafTech's existing health, safety and environmental (HS&EP) policies and management system.

GrafTech Celebrates 125th Anniversary with Community Service Projects and Encourages Sustainable Lifestyles

During 2011 we celebrated GrafTech's 125th anniversary, a milestone of which we all are very proud. Our longevity and success can be attributed to building a sustainable LEAN culture, driving for results, making smart strategic decisions and, most of all, our dedicated team and their families.

To mark our 125th anniversary and show our global team's continued commitment to our local communities, in 2011 each location developed and implemented a community service project using the number "125." Click here to view each locations contribution to their community.

In celebration of GrafTech's 125th anniversary in 2011, we assembled a presentation with suggestions for living sustainably. Click here to view.

GrafTech Rings the Bell, Redefines Limits, and Refreshes Corporate Identity

To commemorate our 125th anniversary, on August 12, 2011 GrafTech visited the New York Stock Exchange (NYSE) and company representatives, including members of the management team and board of directors, rang the Closing Bell®.

We used our 125th anniversary is an opportunity to refresh our corporate identity and to create a consistent look across our businesses and functions. The most significant enhancement to our brand is the addition of a tagline: "Redefining limits." This statement suits us perfectly because it hints at GrafTech's innovative past, present and future. It implies that we don't accept the status quo. In fact, over our 125-year history, GrafTech has built a reputation for delivering customer solutions that have exceeded expectations and enabled customer success better than was previously thought possible.

"Redefining limits" empowers us to maintain a nimble position in ever-changing global markets and industries. It empowers us to reach. Our team has commercialized a host of new products and solutions that did not exist in the world a decade ago and added new product lines. As described below, our commitment to innovation and new product technology was recognized as we were awarded our seventh R&D 100 award in the last nine years. Further, through strategic acquisitions, we now have needle coke and super fine graphite grain in our portfolio. We are now the world's largest graphite electrode producer and, among our peers, the industry's low cost producer. The tagline also gives credit to the fact that none of these could be possible without Team GrafTech's hard work and passion for continuous improvement. We are redefining limits as a company because our team members do it in their jobs every day.

Our Continuing Commitment to Sustainability
The accompanying information is intended to identify relevant elements of our HS&EP initiatives, including our team structure, relevant policies, training programs, resources and executive accountability.

The tenets of our commitment include:

Environmental Protection
At GrafTech, we recognize the importance of preserving and protecting our natural resources. Meeting this commitment is a primary management objective and the individual and collective responsibility of all GrafTech employees worldwide. We pursue environmentally sound business practices.

Occupational Health
GrafTech is continually committed to promoting occupational health awareness in our business through the development and delivery of new and established programs. These programs exist and are designed to protect our employees from overexposure to physical, chemical and biological agents in the workplace.

Occupational Medicine
GrafTech provides leadership to protect, evaluate, maintain and promote the health of our employees. We give guidance to assist in the prevention and management of occupational injury and illness while promoting the health and well-being of our workers.

Product Responsibility
GrafTech has established programs designed to provide reasonable assurance that product risks are properly characterized and managed.

Corporate Integrity and Compliance Program
We have set high ethical standards, which we integrate into our daily working lives. We view abiding by high standards and observing the letter and spirit of applicable laws and regulations is an ethical obligation for all of us at GrafTech International Ltd. We have adopted a Code of Conduct and Ethics and living by the Code is one of our most important responsibilities.

This commitment to integrity applies to all our GrafTech team members regardless of position or level of responsibility. All of us are accountable for the integrity and consequences of our actions. Ethical

business conduct is GrafTech's highest priority. Each of us is charged with taking personal responsibility for maintaining ethical standards in the performance of our jobs.

We plan to expand our reporting over time and provide updates on our sustainability program to help our stakeholders better understand GrafTech's dedication to long term sustainability. Future reports may include additional Key Performance Indicators on energy, water and waste conservation through LEAN manufacturing initiatives along with cost savings of these programs.

Worldwide Health, Safety and Environmental Protection Policy

Governing Principle

GrafTech will achieve its vision to enable customer leadership better and faster than our competition through the creation, innovation and manufacture of carbon and graphite material science-based solutions. This success depends upon our continued commitment to conduct our business responsibly and in a manner designed to prevent accidents and pollution and to protect the health and safety of our employees, our customers and the public.

Core Values and Commitments

GrafTech promotes health, safety and environmental excellence throughout all facets of the business. Implementation of this policy and the company's health, safety and environmental protection procedures is the responsibility of all GrafTech managers and team members. Applicable health, safety and environmental considerations are integrated into business decisions and planning activities. GrafTech designs and implements programs and procedures to provide reasonable assurance that these core values and commitments are met at all locations.

Communication

GrafTech communicates this policy to all employees to ensure their understanding, commitment and active involvement in achieving established health, safety and environmental protection objectives and targets. GrafTech makes this worldwide health, safety and environmental protection policy available to the public and, when appropriate, communicates other relevant health, safety and environmental protection information regarding its products and operations, including any significant hazards, to potentially affected persons and other interested parties.

Compliance

GrafTech is committed to comply with all relevant health, safety and environmental legal requirements, and with all established internal policies and procedures.

Responsibilities and Accountabilities

It is the responsibility of every GrafTech employee to adhere to this policy. GrafTech line managers are responsible and accountable for health, safety and environmental protection performance within their respective areas of responsibility, including:

Setting, reviewing and assuring that health, safety and environmental objectives and performance targets are met.

Integrating health, safety and environmental protection management systems with other internal policies and external requirements.

Balancing production goals and financial performance with health, safety and environmental requirements.

Providing adequate leadership, resources, training and delegation.

Operations

GrafTech designs, maintains and operates its facilities in such a manner as to avoid accidents and unacceptable risk to the environment, human health and safety.

Products
GrafTech produces and sells products that do not present an unacceptable risk to the environment, human health or safety.

Continuous Improvement
GrafTech monitors best available technology and management practices, and remains committed to continuous improvement by measuring its performance against established health, safety and environmental protection goals.

Sustainability In Motion

Worldwide Health, Safety and Environmental Protection Procedures

Health, Safety and Environmental Management Systems

Health, Safety and Environmental management systems are designed, implemented and maintained at all management levels to provide reasonable assurance that GrafTech complies with governmental and internal requirements. Areas that are addressed include, but are not limited to: management leadership, accountability, planning and resources, goals and measurements. Control mechanisms (e.g., audits, reviews, inspections, monitoring, and sampling) are designed to evaluate programs, measure progress and provide reasonable assurance that:

Products and operations comply with applicable governmental and internal requirements.

Deficiencies are identified, prioritized and properly corrected.

Hazards are routinely identified, their risk quantified and prioritized with suitable controls to eliminate or minimize the hazards then put into place.

Emergency Preparedness
Written emergency preparedness plans and/or procedures exist to address reasonably foreseeable emergency situations at GrafTech locations and to provide appropriate hazards and emergency preparedness information to employees, external emergency response agencies and the community.

On-Site and Off-Site Contractors
GrafTech employs programs for on-site and off-site contractors' selection. These programs provide reasonable assurance that all contractors are technically and financially capable of performing their work in compliance with applicable health, safety and environmental requirements.

Change Management
Procedures have been developed, implemented and are being maintained to ensure that an appropriate level of review is conducted prior to physical, process or procedural changes. Reviews identify and address personnel health, safety, process and/or environmental issues that may arise as a result of the change.

Personnel Safety
Programs exist and are designed to enable employees to perform their work-related responsibilities safety. Areas that are addressed include, but are not limited to:

Personal protective equipment

Vehicle safety

Employee information and Training

Potentially Hazardous Work
Programs exist and are designed to protect employees exposed to potentially hazardous work conditions including, but are not limited to:

Entry into confined spaces

Crane operations near power lines

Cutting, welding or introduction of an ignition source into a restricted area

Digging and excavation work

Electrical repair and diagnostic hot work

Potentially hazardous electrical switching

Performing elevated work

Equipment Lockout and Tagging
Programs exist and are designed to protect employees working on or in proximity to equipment with the potential for unexpected operation, movement, release of energy or release of hazardous materials.

Occupational Health
Programs exist and are designed to protect employees from overexposure to physical, chemical and biological agents in the workplace. Areas that are addressed include, but are not limited to:

Exposure monitoring and reduction

Hazard communication

Hearing conservation

Respiratory protection

Sanitation

Smoking

Air Emissions
An air assessment exists and includes descriptions of local ambient air quality, governmental classifications and requirements, and any other relevant information.

The inventory and assessment are evaluated to determine whether existing control measures are adequate to prevent planned or potential unplanned air emissions from creating a potential liability, significantly impairing the ambient air quality or adversely affecting the health or safety of employees and the public. This takes into consideration at least the following issues:
Compliance with local laws and regulations

Potential health (acute and chronic) or safety impacts to neighboring communities

Damage to the environment, including impairment to visibility, negative impact on agriculture/crops or local surface water bodies, ozone depletion, etc

Potential increased public awareness, regulatory scrutiny or other liabilities, due to dust, odors, noise or other visible or readily detectable emissions that could create a public nuisance

Waste Management
A current waste inventory exists for each GrafTech location. Explanations of significant changes are tracked for the location's waste inventory. These include: changes in generation rate for the waste stream; changes in the waste management contractor used to manage the waste stream; and, changes in the waste site used to treat, store, dispose or recycle the waste stream.

Groundwater Protection
A groundwater assessment exists for all GrafTech locations identifying past and/or present activities that have had or have the potential for adversely affecting groundwater quality. The assessment contains descriptions of local groundwater hydrology, present and prospective groundwater uses, existing groundwater quality, governmental classifications and requirements, and any other relevant information. The inventory and assessment are evaluated to determine if location activities have resulted in releases which have, or are likely to have, adversely affected groundwater quality.

Surface Water Protection
Surface water assessments exist and include descriptions of surface water volumes, flows, existing qualities, present and prospective uses, governmental classifications and requirements, and any other relevant information. The inventory and assessment are evaluated to determine if current planned or potential unplanned discharges to surface waters from normal operations could be adversely affecting employees, the public or the environment. Appropriate corrective actions, such as remedial/control measures, are promptly implemented when it is determined that there is a current or likely potential adverse effect on surface waters due to discharges from normal operations.

Pollution Prevention
Written waste minimization and release reduction programs are designed to take into account the health and safety of employees and the public, the potential impact on the environment, and community concerns. Key elements of the programs include:

Initial evaluation of location air, waste, and water inventories and pollution prevention practices at each step of the operation where pollutants are generated or released. The evaluation is reviewed annually and updated, as appropriate.

Identification of preferred waste and release reduction options including first, source reduction; second, recycling/beneficial reuse; and third, treatment.

Assessment of waste minimization and release reduction opportunities in research and design of new or modified facilities, processes and products.

Establishment of priorities, goals and written action plans for ongoing reduction of wastes and releases to air, water and land, taking into account technical and economic feasibility.

Occupational Medicine
Programs exist to protect, evaluate and maintain the health of GrafTech employees through a program of occupational medicine practices and services, while at the same time preserving the privacy rights of our employees. These include:

Provide occupational medical services for all employees that emphasize prevention and health promotion, as well as rehabilitation and treatment designed to reduce disability time resulting from accidents and illnesses.

Provide medical evaluation programs for determining an employee/applicant's fitness for duty, the health status of employees exposed to identified health hazards and the need for preventative measures to protect health.

Maintain the confidentiality of medical records according to laws, regulations, and applicable standards.

Conduct epidemiology investigations, when indicated, to identify potential health hazards that could affect employees, customer's employees or the community at large.

Site Security

Each GrafTech location has developed, implemented and maintains security programs that provide on-site security measures designed and implemented to:

Protect employees who work at the site.

Protect community citizens and visitors, who may enter the property, from injury or illness.

Protect location assets from theft or harm.

Protect proprietary or confidential information and technology.

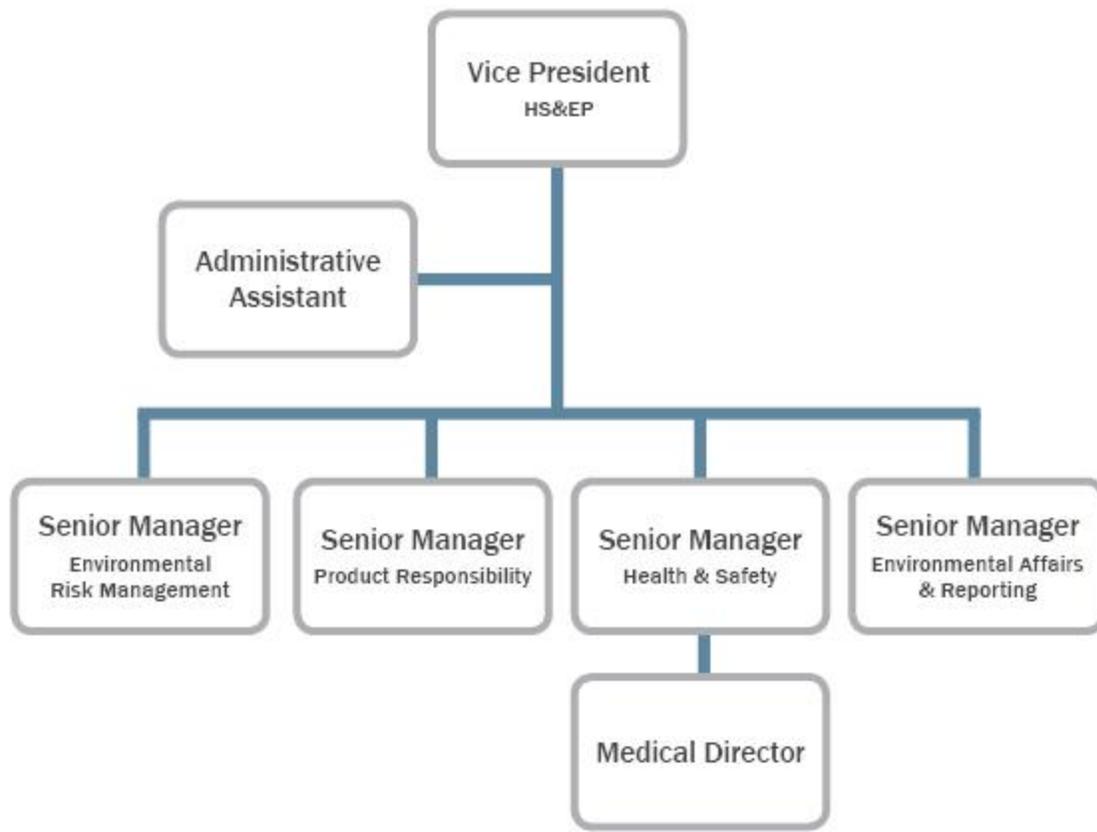Sustainability In Motion

HS&EP

Executive Accountability

Representatives of the GrafTech Corporate Health, Safety and Environmental Protection Department conduct periodic audits at all facilities to provide reasonable assurance of compliance with applicable governmental and internal requirements. The audit process follows specific steps and procedures that are intended to determine or verify the extent to which compliance is being achieved. Audits are scored and the audit results are shared with the Board of Directors. Senior Managers are held accountable for the audit results of all facilities for which they are responsible.

All audit deficiencies are discussed with the Facility Manager and confirmed in a written report. The Facility Manager is responsible for initiating and implementing an Action Plan to correct noted deficiencies. Senior Managers are required to sign off on all Audit Action Plans submitted from facilities for which they are responsible.

In addition to audits HS&EP assessments are routinely conducted so that facilities have the opportunity to identify deficiencies and programs in need of improvement before their next audit. The assessments allow time for discussion on compliance strategy and recommended practices. In addition, they promote continuous improvement by identifying opportunities to simplify procedures and reduce compliance costs.

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Organizational Chart

- **Vice President** — HS&EP
  - **Administrative Assistant**
  - **Senior Manager** — Environmental Risk Management
  - **Senior Manager** — Product Responsibility
  - **Senior Manager** — Health & Safety
    - **Medical Director**
  - **Senior Manager** — Environmental Affairs & Reporting

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Training Programs

Employees are provided with appropriate information and training to provide reasonable assurance that they have adequate knowledge and skills to fulfill their health, safety and environmental responsibilities and to understand that full compliance with health, safety and environmental requirements is an integral part of their jobs. Records are maintained which include the dates, subjects covered, and attendance. At a minimum, the following programs are in place:

Leadership training provides newly appointed managers an overview of HS&EP policies and procedures. Training focuses on both the value and potential risks associated with key program elements with an emphasis on reasons why management controls are established and the role the manager's play in ensuring maximum effectiveness in their area of responsibility.

Facility HS&EP personnel have the necessary technical education and training to perform their function. Continuing education and training is provided to keep personnel current in their area of expertise and knowledgeable in all governmental regulations affecting their function.

Safety/Health and Loss Control/Environmental Protection Awareness/Philosophy Training is provided to personnel within one (1) year of their entering a supervisory position.

Facility HS&EP provides training programs for appropriate employees as required by governmental agencies and internal requirements.

Visitors at GrafTech locations are provided with appropriate information about potentially significant hazards to which they may be exposed and precautionary measures and actions to be taken in response to reasonably foreseeable emergency situations. Visitor access into and out of production or other high-risk areas is controlled.

At GrafTech, we recognize the importance of designing programs, educating and enabling our employees to perform their work-related responsibilities safely. Through these policies, practices, and procedures our employees worldwide are empowered to prevent accidents and injuries. GrafTech is proud to continuously record lower than average injury / illness rates compared to other industrial recordable rates. The recordable injury/illness rates (RIIR) on the chart, represent the number of injuries and illnesses per 100 full-time workers and were calculated as: (N/EH) x 200,000, where:

N = number of injuries and illnesses
EH = total hours worked by all employees during the calendar year
200,000 = base for 100 equivalent full-time workers (working 40 hours per week, 50 weeks per year)

The Recordable Injury/Illness Rates (RIIR) plotted on the chart are taken from annual surveys of occupational injuries and illnesses, conducted by the Bureau of Labor Statistics (BLS), U.S. Department of Labor.

The BLS annual surveys provide Recordable Injury/Illness Rates that are grouped by industry using the North American Industry Classification System.

GrafTech's RIIR is compared to various industries:

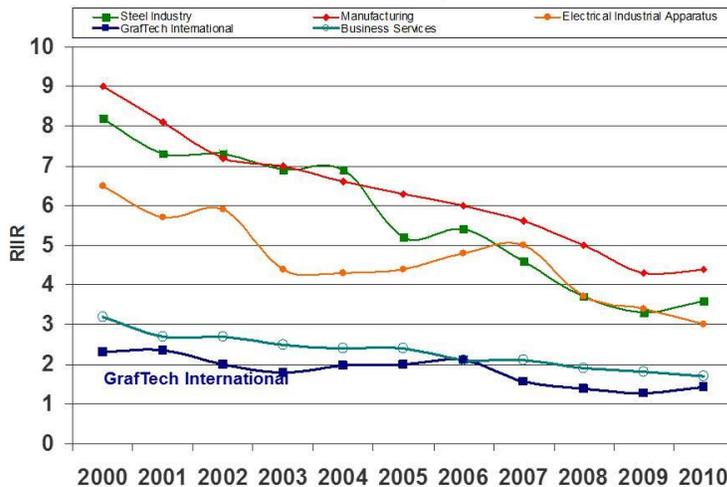**Manufacturing** because GrafTech is a manufacturer.

Steel Industry because it is one of the primary industries that GrafTech services.

Electrical Industrial Apparatus because GrafTech falls under this North American Industry Classification System code.

Professional Services to show how good GrafTech's safety performance is as a manufacturer. Professional Services (legal services, accounting, computer systems design, etc.) is predominately an office environment classification.

Industrial Recordable Injury/ Illness Rate Comparison

Worldwide Health, Safety and Environmental Protection Policy
Governing Principle
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through the creation, innovation and manufacture of carbon and graphite material science-based solutions. This success depends upon our continued commitment to conduct our business responsibly and in a manner designed to prevent accidents and pollution and to protect the health and safety of our employees, our customers and the public.

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Responsibilities and Accountabilities
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Integrating health, safety and environmental protection management systems with other internal policies and external requirements.
Balancing production goals and financial performance with health, safety and environmental requirements.
Providing adequate leadership, resources, training and delegation.

Operations
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Products
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Continuous Improvement
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Sustainable Growth Through Innovation and Strategic Acquisitions

Research & Development
In 2011, GrafTech won its seventh R&D 100 Award in nine years with eGRAF® SS1500. This award recognizes the 100 most technologically significant products introduced and commercialized in the past year. R&D Magazine holds that the award ceremony is "widely recognized as the 'Oscars of Innovation,' and identifies and celebrates the top high technology products of the year. Sophisticated testing equipment, innovative new materials, chemistry breakthroughs, biomedical products, consumer items, high-energy physics: the R&D 100 Awards spans industry, academia, and government-sponsored research."

Our **eGRAF® SS1500** material is part of our line of SPREADERSHIELD™ products that distribute heat evenly while providing thermal insulation through the thickness. This unique combination of spreading and shielding properties make flexible graphite an excellent material choice for thermal solutions. By eliminating heavy thermal solutions, SPREADERSHIELD products have enabled slimmer product design and reduced product weights by up to 50%

Other Strategic Growth Initiatives
In February 2011, Micron Research Corporation became the newest addition to GrafTech's growing global team. The Emporium, Pennsylvania-based company manufactures a portfolio of super fine grain graphite using uniquely developed technologies. Micron Research's products have applications in many high growth end markets, including solar, advanced electronics, electronic discharge machining and medical.

In October 2011, we acquired the business and assets of Fiber Materials, Inc. (FMI). FMI is engaged in researching, manufacturing and distributing advanced composite and high temperature materials for the defense, aerospace and commercial markets. FMI developed reinforced composites used in strategic missile systems and space reentry vehicle applications. Along with these advances, FMI manufactures felt and rigid carbonaceous insulation materials and carbon composites, a strong, lightweight and durable carbon matrix used in many commercial applications.

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GrafTech Products Contribute to Sustainability
Why graphite? Graphite has a unique combination of properties that make it irreplaceable in many applications. These include:

• It excels in very high temperatures, especially in a non-oxidizing environment
• It is twice as strong at 2500°C as it is at room temperature. (Steel melts at ~ 1500°C)
• It is resistant to attack from chemicals and metals
• It has a very low coefficient of thermal expansion – ten times lower than steel
• It resists thermal shock many times better than ceramics or refractory materials
• It can be engineered to be as insulative as home insulation
• It can be engineered to be four times more thermally conductive than copper, at 1/5th the weight
• It can be made into sheets as thin as 0.0004 inches or blocks as big as 73 inches in diameter and 72 inches tall
• It is available in large, industrial quantities

The Role of Carbon & Graphite in Sustainable Energy Applications

Products
• Graphite Electrodes
• Advanced Graphite Materials
• Natural and Flexible Graphite

Graphite Electrodes - Currently, most of our sales revenue is from graphite electrodes and needle coke, which is used in making graphite electrodes. Graphite electrodes help recycle materials that might otherwise end up in a landfill and provide new steel needed for making new products that enhance our lives. Graphite electrodes are used almost exclusively within the electric arc furnace of a steel mill. A graphite electrode is a device to conduct electricity down into an electric arc furnace which generates sufficient heat to melt scrap steel. An electric arc furnace is essentially a big recycling machine. Simply put, it's a large pot into which scrap steel, like old cars, bicycles, and refrigerators, are melted and recycled into new steel used for making new and useful products. There is no known substitute for graphite electrodes because only graphite can withstand the incredible temperatures of the electric arc furnace.

Advanced Graphite Materials - Advanced graphite materials are highly engineered synthetic graphite products used in many industrial areas due to their unique properties and the ability to tailor them to specific solutions. These products are used in the transportation, solar, metallurgical, chemical, oil and gas exploration, and various other industries.

For example, advanced graphite materials are essential to the production of polysilicon for the semiconductor and solar industries, the casting of rail wheels for transportation applications that maximize energy use, as insulation in thermal process applications to manage excess heat, tooling applications for the aerospace industry to enhance safety and energy usage, in oil and gas exploration for the responsible development of natural resources. Advanced graphite materials are usually consumed in our customers' manufacturing processes. We have extensive product and process technology know-how, supported by a state-of-the-art Research and Development center

Our customer base includes producers whose products contribute to sustainability. We not only see growth in these applications, but work together to provide products that contribute to sustainability and take into account the need for prudent use and development of valuable resources such as energy demand from the developing countries (oil and gas exploration), the demand for Green Energy (e.g. solar and wind), and a reduction in the carbon footprint (responsible nuclear applications).

Our products are used in applications that promote sustainability. Extruded graphite parts are used in the production of diamond drill bits, in advanced body armor manufacture, as anodes for producing nonferrous metals and as crucibles for polysilicon manufacturing. Other uses include the production of molds and crucibles, heating elements and furnace furniture, liquid metal handling and chemical process equipment.

Molded graphite has been developed by GrafTech using its extensive technical expertise and innovation to make the largest sized product in the industry. This allows customers to increase their batch size and cut processing and scrap costs, and improve quality. Applications include solar, rail wheel manufacture, semiconductor, and chemical process industry.

Isomolded graphite is made using fine and superfine raw material particle fractions in a special molding process that applies equal pressure in all directions, thus making properties the same in all directions. Isomolding is the best technology for manufacturing fine grain graphites which provide the strength, surface finish and chemical resistance needed for high technical demand applications like solar, semiconductor, LED and EDM.

Insulation: GrafTech is widely recognized as offering the best rigid insulation product in the market today, targeted at heat shields for semiconductor crystal growing furnaces. Graphite insulation is predominantly used in the solar and semiconductor industries for the processing of silicon.

Natural and Flexible Graphite - Our natural and flexible graphite products include of thermal management solutions, fuel cell components, and sealing materials. Our products promote alternative

energy sources, electronic thermal management and efficient energy storage applications

For decades, GrafTech has been one of the world's leading manufacturers of natural graphite material-based products. The versatility of our proprietary processes and equipment enables us to tailor our products to meet a variety of unique applications. We work with our customers to develop technologically advanced solutions, utilizing our knowledge and expertise of natural graphite.

Recently, our scientists and engineers developed the eGRAF SPREADERSHIELD SS1500 product. This product has the highest thermal conductivity of the product line and a breakthrough manufacturing process.

Our flexible graphite solutions have been developed to meet the heat-dissipation and component design challenges facing design engineers in consumer electronics. Our solutions have much higher thermal conductivity and significantly lighter weight than traditional materials like copper and aluminum. In addition, because of directional properties imparted as part of the manufacturing process, we are able to present design engineers with more options and control in their design, performance improvement, and size reduction goals.

Advantages of our flexible graphite products include:
• Thermal conductivities more than four times those of copper
• Conformable and extremely thin
• Solution with no moving parts
• 75% weight savings over copper
• Mechanical and thermal stability

GrafTech International Ltd. Code of Conduct and Ethics

The fundamental principle governing GrafTech International Ltd.'s actions and the actions of its officers and employees is that ethics and business are inseparable at GrafTech and its subsidiary companies. No other business objective can be achieved without following the highest ethical standards and complying with all the local and national laws and regulations that pertain to our operations. Our Code of Conduct and Ethics is designed to help us make ethical business decisions. It will be vigorously enforced at every level of GrafTech International at all times.

No single document can cover every situation. Our team may face dilemmas in which we must consider options and decide what to do. GrafTech has developed specific policies and procedures to provide guidance to its employees in a number of areas. GrafTech expects your conduct to be guided by this Code of Conduct and Ethics, by GrafTech's policies, by our team's personal sense of right and wrong and by the answers to the following questions:
• Is this conduct legal?
• Does my conduct comply with GrafTech International policy?
• Is my conduct fair?
• If my conduct was caught on camera and appeared on a local TV newscast, would I still feel good about myself?

Our team should be able to answer "yes" to all these questions before undertaking the conduct.

Most importantly, when questions arise or when an interpretation of policies or procedures is need, we ask for help, including through our managers, our legal team, or our ethics hotline. Our Code of Conduct and Ethics prohibits retribution or retaliation of any kind for reporting or raising issues under the Code.

Our full Code of Conduct and Ethics can be accessed by clicking here.

Worldwide Quality Policy

GrafTech's vision is to produce the best quality products in the industry at the lowest cost and to be the best international manufacturing company in the world. We are committed to continuously improve our products and our processes, to define and implement Best Practices around the world, and to deliver the quality products demanded by our customers.

GrafTech promotes product quality and performance excellence throughout all facets of its businesses. We design and implement programs and procedures, which assure these core values and commitments, are met at every location.

It is the responsibility of every GrafTech employee to adhere to our quality policy. GrafTech line managers are responsible and accountable for quality assurance within their respective areas of responsibility including:
• Setting, reviewing, and meeting quality assurance targets
• Integrating quality management systems with other internal policies and external requirements
• Balancing production goals, financial performance, and quality assurance targets, while meeting health, safety, and environmental requirements
• Providing adequate leadership, resources, training, and delegation

GrafTech's Disclosure under the California Transparency in Supply Chains Act of 2010

The California Transparency in Supply Chains Act of 2010 requires retailers and manufacturers doing business in California to disclose their efforts to eradicate forced labor and human trafficking from their direct supply chain. The following is the disclosure under the Act for GrafTech and its subsidiaries.

1. Risk Assessment/Verification
The Company conducts a risk assessment as part of its due diligence when choosing potential suppliers. To evaluate new and existing suppliers, the Company uses a third party service provider to obtain access to a substantial international data base of information on companies. Many factors are considered as part of the process, including risks of human trafficking and slavery.

2. Auditing
The Company's internal audit group randomly reviews its suppliers for evidence of non-compliance with laws and Company standards, including those relating to human trafficking and slavery.

3. Certification
The Company's Supplier Code of Conduct is being provided to its supply base around the world and addresses the subject of labor abuse. Although certification of compliance to the Supplier Code is not required, the failure of suppliers to adhere to the Code could result in the termination of their relationship with the Company.

4. Internal Accountability
The Company requires all employees, including those involved in the supply chain, to certify and adhere to the Company's Code of Conduct and Ethics. The standards make clear that any violations of the Company policy can result in disciplinary action, up to and including discharge.

5. Procurement Training
The Company provides periodic training to its employees responsible for procurement on a number of

topics. Future training will include forced labor, human trafficking and slavery issues and the mitigation of such risks in its supply chains.

Sustainability In Motion

Supplier Code of Conduct
March 30, 2012

TO: GRAFTECH SUPPLIERS

SUBJECT: SUPPLIER CODE OF CONDUCT AND ETHICS

Dear Supplier:

GrafTech adheres to the highest standards of ethical conduct and will comply with all laws that apply to the activities of the company and its personnel. We also expect our business partners, including our suppliers, to adhere to these ethical standards.

Accordingly, we respectfully request that you, as a GrafTech supplier, review this Supplier Code of Conduct and Ethics and we strongly encourage compliance in your dealings with GrafTech.

I. Code of Conduct:

A. General Principle: Suppliers' plants shall operate in full compliance with the laws of their respective countries and with all other applicable laws.

B. Environment: Suppliers' plants must comply with all applicable environmental laws and regulations.

C. Health and Safety: Suppliers will operate a safe and healthy work environment.

D. Child Labor: Suppliers shall ensure their hiring practices are in conformance with International Labor Organization (ILO) Conventions for minimum age (Convention 138) and child labor (Convention 182).

E. Forced Labor: Suppliers shall not use any indentured or forced labor, slavery or servitude. Suppliers will ensure that terms of employment are voluntary and will not adopt practices that restrict workers' ability to terminate employment.

F. Wages and Hours: Suppliers' plants shall set working hours, wages and over-time pay in compliance with all applicable laws. Workers shall be paid at least the minimum legal wage or a wage that meets local industry standards, whichever is greater.

G. Discrimination: Suppliers shall employ workers on the basis of their ability to do the job, not on the basis of their personal characteristics or beliefs (including race, color, gender, nationality, religion, age, maternity, or marital status).

H. Freedom of Association: Suppliers' workers are free to join or refrain from joining associations of their own choosing, and have the freedom of collective bargaining where the local law confers such rights.

I. No Unfair Business Practices: Suppliers will act with integrity and lawfully in the proper handling of competitive data, proprietary information and other intellectual property, and comply with legal requirements regarding fair competition, antitrust and accurate and truthful marketing.

J. Anti-Corruption: Suppliers will conduct their business without engaging in corrupt practices, including public and private bribery or kickbacks. Suppliers will maintain integrity, transparency, and accuracy in corporate record keeping.

K. Gifts and Gratuities: Supplier will not engage in bribery or similar arrangements. In addition, GrafTech's employees are subject to its Code of Conduct and Ethics that prohibits the acceptance or offering of unreasonable or inappropriate gifts of any kind from suppliers and potential suppliers. If a GrafTech employee approaches Supplier soliciting such unreasonable or inappropriate gifts or gratuities, then Supplier will report these acts to GrafTech.

L. Conflicts of Interest: Supplier understands that a GrafTech employee shall not have a conflict of interest (such as a material ownership interest in the Supplier) unless reported to and approved by GrafTech management. Supplier agrees to disclose to GrafTech whether a material financial relationship exists between it and a GrafTech employee.

II. Reporting

A. Supplier agrees to advise GrafTech if it discovers any regulatory violations by GrafTech.

B. Supplier agrees that it will disclose to GrafTech any illegal activity it discovers related to the business relationship between Supplier and GrafTech.

C. Supplier agrees to report any of the above violations to their procurement contact or via GrafTech's anonymous hotline by calling 216.676.2472, or by submission electronically to Electronic Hotline Submission, which can also be found at www.graftech.com by following the link to the "Company – Corporate Policies" page.

III. Compliance Monitoring

GrafTech reserves the right to audit the supplier for compliance to GrafTech's Supplier Code of Conduct and supplier will accommodate GrafTech's audit as required.

IV. Application to Sub-contractors

This Code also applies to any sub-contractor(s) to the supplier, providing goods or services to the supplier. The supplier is fully responsible for ensuring compliance by any such sub-contractor(s) as if it were the supplier itself. GrafTech reserves the right to audit the supplier's sub-contractors for compliance to GrafTech's Supplier Code of Conduct and supplier will accommodate GrafTech's audit as required.

V. Event of Violation
Failure of the supplier to adhere to the Code may result in the termination of their relationship with GrafTech.