

# STANDARD POLICY

POLICY NO.:           KMT-OGC-01-0001          

REVISION:     00     PAGE:     1 of 2    

**SUBJECT/TITLE:      Global Non-Retaliation and Reporting Obligation Policy**

This page is a record of all revisions of the Policy or Work Instruction.

For convenience, the nature of the revision is briefly noted under remarks. Please review the attached policy to assure complete understanding of all relevant changes, additions, or deletions. Unless otherwise stated, this revision should be implemented upon receipt.

REV	BY	PAGES	REMARKS
00	PJW	1-2	Original Release
02	SAR	2	Updated and reformatted to a global policy

REV	ISSUED BY	APPROVED BY	APPROVAL DATE
00	Paul J. Ward	Kevin G. Nowe	10/18/2012
01	Paul J. Ward	Kevin G. Nowe	11/1/2013
02	Seth A. Rice	Kevin G. Nowe	9/4/2015

## **Global Non-Retaliation and Reporting Obligation Policy**

### **1. Scope**

This policy applies to all employees, officers, and directors of Kennametal Inc. and its subsidiaries and affiliated companies worldwide (hereinafter called “Kennametal personnel”).

### **2. Introduction**

The Kennametal Code of Conduct establishes guidelines and responsibilities for all employees, officers, directors and business partners in order to proactively promote honest and ethical behavior throughout our operations.

All Kennametal personnel and business partners are expected to do business with the utmost integrity, the highest ethical standards and in a fair and respectful manner.

### **3. Reporting Ethics and Compliance Concerns**

All Kennametal personnel who have knowledge of any activity that is or may be a violation of the Code of Conduct, any Kennametal policy or procedure, or any law or regulation, are required to promptly report such activity to the Company. Reports of misconduct or violations may be made to members of Company management, the Office of the General Counsel, or the Director of the Office of Ethics and Compliance.

Confidential and anonymous reports can be made at any time to the Kennametal Helpline at 1-877-781-7319 using the [AT&T global access numbers](#), by submitting a report online at <https://kennametal.alertline.com/gcs/welcome> or <https://kennametaleu.alertline.com/gcs/welcome> in Germany and France, or by emailing the Office of Ethics and Compliance at [k-corp.ethics@kennametal.com](mailto:k-corp.ethics@kennametal.com).

### **4. No Retaliation**

No Kennametal personnel or business partner who has reported a known or suspected violation in good faith shall be subject to any retaliation, including harassment or adverse employment consequences. Any form of retaliation is a violation of the Code of Conduct, Company policy and is a violation of law in most jurisdictions in which Kennametal operates.

Any Kennametal employee, officer or director who retaliates against someone who has reported a known or suspected violation in good faith is subject to disciplinary action, up to and including termination of employment.

This Policy is designed to encourage and protect Kennametal personnel and others who raise concerns about known or suspected violations of the Code of Conduct, any Company Policy or Procedure or any law or regulation.

## 5. Good Faith Reporting

Any good faith report, concern or complaint is fully protected under this Policy, even if the issue reported is, after investigation, not substantiated or confirmed.

Anyone who raises a concern or files a complaint concerning a known or suspected violation must be acting in good faith and have a reasonable basis for believing that the information reported is, in fact, a violation.

Any allegations that are not substantiated and are proven to have been reported maliciously or with the knowledge that they were false will be treated as a serious violation of this Policy, and will be subject to disciplinary action, up to and including termination of employment.

## 6. Response to Reported Violations

All reports of violations or misconduct will be promptly investigated and appropriate corrective action will be taken, if warranted by the investigation. The individual reporting the known or suspected violation will receive an appropriate follow-up response upon completion of the investigation, unless the individual reported anonymously with no means to provide a follow-up response.

## 7. Confidentiality

All reports of misconduct or violations are maintained confidentially, with the investigation involving only those persons necessary to evaluate the reporting concern. Best efforts will be made to protect the identity of any persons reporting alleged violations or misconduct, as well as those interviewed or consulted during the investigation process. Persons involved in the investigation process or that have knowledge of the alleged misconduct or violation are required to maintain all information regarding the investigation in a confidential and discrete manner.