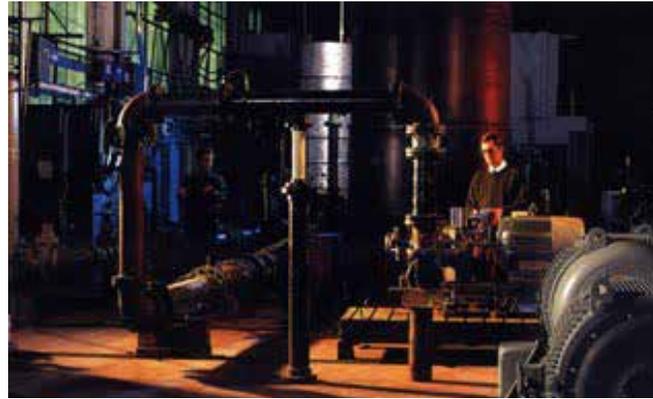
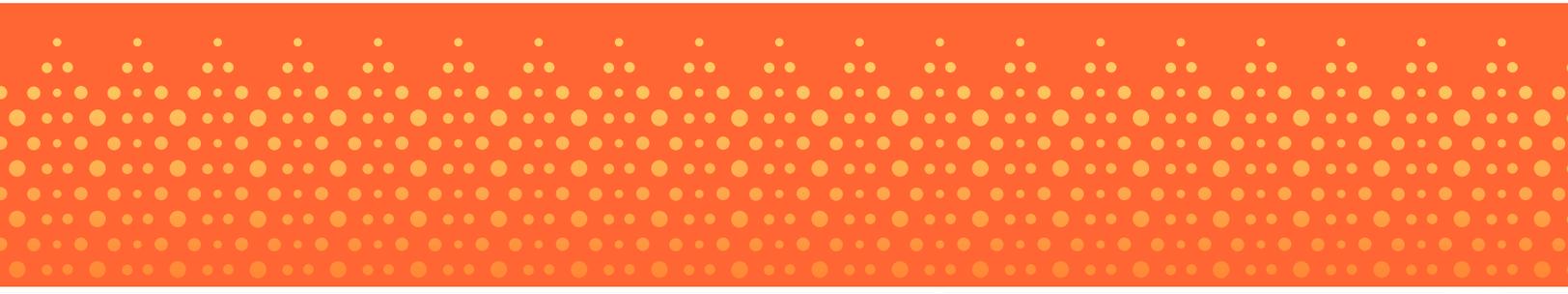




Ampco-Pittsburgh

Moving forward.



CODE OF CONDUCT



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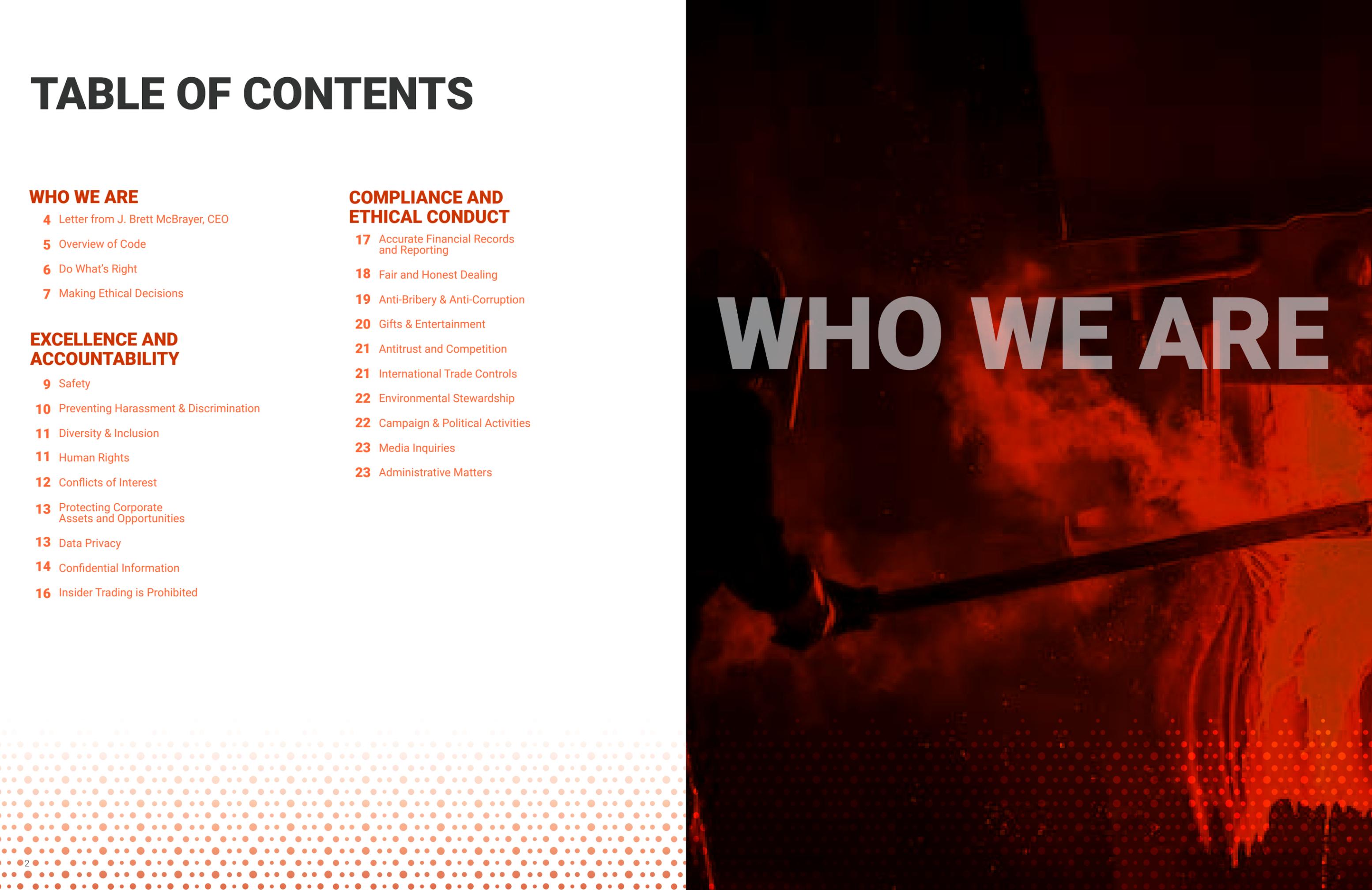
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WHO WE ARE

A message from the CEO



J. Brett McBrayer, CEO

COLLEAGUES –

Ampco-Pittsburgh's success is grounded in our most valuable company asset—our people. Not only are our employees technically among the best in the world, but their “can do” spirit and commitment to meeting our commitments and goals “The Ethical Way” has allowed the Corporation to continue to grow and enhance our reputation as a world leader in the products we manufacture and markets we serve.

Our positive corporate reputation has been created one relationship and one decision at a time. Just as it was created, that same reputation can be severely damaged if we do not remain diligent and mindful of our ethical responsibilities, hold ourselves and each of our colleagues responsible for acting in an ethical and legally compliant manner.

The Ampco-Pittsburgh Code of Business Conduct and Ethics serves as an invaluable resource for guiding us in making ethical decisions at work, understanding how to navigate ethical challenges, feeling confident that if we **Speak Up!** in good faith, our concerns will be addressed without fear of retaliation. Please join me in ensuring that Ampco-Pittsburgh's reputation remains strong, **Speak Up!** if you have questions or concerns and keep this Code as an ongoing resource if you have questions or if you need guidance.

Thank you for your continued commitment to working with integrity. Together we can ensure that Ampco-Pittsburgh remains one of the most ethical companies in the world.

OVERVIEW OF THE CODE

Why Do We Have the Code of Business Conduct and Ethics (the “Code”)?

- We believe that acting with integrity and ethics is simply the right thing to do!
- Working with integrity strengthens relationships among our teams and with our shareholders, customers, suppliers, and the communities where we operate.
- We are committed to providing an inclusive and safe work environment where individuals and teams thrive.
- The Code helps guide us in our daily work, in handling ethical challenges, and knowing when to **Speak Up!**

Who Does the Code Apply To?

- The Code applies to all of us—directors, officers, full and part-time employees of Ampco-Pittsburgh Corporation and each of its subsidiaries (*individually, a “Company” and collectively, the “Corporation”*), as well as interns, temporary workers and independent contractors.
- We expect those working on behalf of each Company to follow similarly high ethical standards.

Your compliance with the Code is in addition to your responsibility to comply with applicable foreign, federal, state and local laws and regulations, Corporation policies and procedures, plant work rules, and plant rules of conduct. Failure to comply with these and/or the Code may subject you to disciplinary action, up to and including suspension or discharge.

Who is Responsible for Overseeing Our Code?

- The Corporation's Board of Directors (*the “Board”*) is responsible for adopting the Code, and the Board's Audit Committee and the Nomination & Governance Committee are regularly updated regarding any alleged or actual violations, and the Committees also review courses of action.
- The Corporation previously established and maintains a Business Conduct and Ethics Committee (*the “Ethics Committee”*), primarily responsible for promoting, monitoring, and enforcing the Code.

Any waiver of our Code requires prior written approval of the Board or a committee thereof. Waivers will be promptly disclosed as required by law.

Anti-Retaliation Policy

Any person who, in good faith, reports any incident involving actual or suspected unethical business conduct, violations of law, violations of this Code or any other Corporation policy (including accounting, internal controls or audit policies), or incidents representing a danger to any person's safety will be protected from threats of retaliation, discharge, or other types of discrimination, including compensation or terms and conditions of employment that are directly related to the disclosure.

DO WHAT'S RIGHT

Your Responsibility

The Code only works with your cooperation and commitment to **Speak Up!**

You are empowered, and you have a responsibility to the Corporation and your colleagues to **Speak Up!** when you

- See or suspect a violation of the applicable laws, the Code or Corporation policy
- Find yourself in a situation involving a violation of applicable law, the Code or a Corporation policy
- Have a question or concern regarding how to handle a situation

The Code and the resources described in this Code can help you evaluate a situation, verify that you are on the right track, or confirm that you see or have a problem that needs to be reported.

Who to Contact with Questions and Concerns?

You can raise concerns with your supervisor, your supervisor's manager, a Human Resource representative, your plant or department manager, the Corporation's EHSS Manager, the Ethics Committee, or through the Ampco-Pittsburgh Compliance Line. In addition, many of the policies referred to in the Code provide specific procedures for reporting concerns or raising questions regarding that subject.

Ampco-Pittsburgh Compliance Line

Are you aware of or suspect illegal or unethical conduct, including a violation of applicable law, the Code or another Corporation policy? **Speak Up!** In other words, be proactive and don't wait for someone else to report an actual or potential violation.

It is every employee's responsibility to promptly report any violations or suspected violations of law. All employees are encouraged to report orally or in writing to their immediate supervisor or the supervisor's manager. In instances where employees are not satisfied with the supervisor or manager's response or are uncomfortable for any reason addressing such concerns to their supervisor or the manager of the supervisor, employees are encouraged to contact their Human Resource representative, their plant or department manager, the Corporation's EHSS Manager, the Ethics Committee or call the Ampco-Pittsburgh Compliance Line.

Good faith concerns can be reported to the Ampco-Pittsburgh Compliance Line in any of the following ways, anonymously if you wish—

TELEPHONE:

US: 1-800-448-0236

China: 400 120 1753

UK: 0800 102 6521

Sweden: 020-12 74 54

Slovenia: 080 688946

WEB PORTAL:

<https://app.mycompliancereport.com/report?cid=APC>

The Ampco-Pittsburgh Compliance Line is available 24 hours a day, seven days a week, and is managed by an independent third party.

MAKING ETHICAL DECISIONS

Every day, your decisions and actions influence both the Corporation's worldwide reputation and its relationships with its employees, customers, suppliers, investors, and the communities where we operate. The Corporation understands that making ethical decisions can be challenging and can often require careful evaluation of complex options and situations. However, failing to carefully consider all options and ensure that the option selected complies with applicable law and the Code can put the Corporation and you at significant risk.

While the Code cannot address every possible situation you may encounter, the Code provides a valuable framework and guidance for ethical decision-making. It reminds you that you are responsible for acting in *The Ethical Way* regardless of the situation.

Additional Responsibilities for Supervisors and Managers

While acting in ***The Ethical Way*** is the responsibility of every employee, director, officer, temporary worker, intern, independent contractor, and business partner, the Corporation's supervisors and managers have an additional responsibility to serve as a positive role model, inspire others by reinforcing the Code's principles, and lead by example:

If you are a supervisor or manager, you must:

- Keep you and your team safe.
- Learn about the Code, Corporation policies, and laws that apply to you and those you manage.

- Ensure your team understands their responsibilities under the Code and Corporation policies.
- Encourage ethical decision-making and compliance with the Code by leading compliance efforts and leading by example.
- Make sure you and your team understand they are each expected to **Speak Up!** when they have ethical concerns or questions.
- Ensure that you and your team members know how and when to report an ethical concern or question.

- Create an open and inclusive work environment where team members feel comfortable to **Speak Up!** without fear of retaliation in any form.
- Safeguard the Corporation's assets, including physical assets, money, confidential information, and intellectual property.
- Take prompt corrective action and seek guidance if you have questions or suspect unethical conduct or violations of the Code or Corporation policies or procedures.

TO MAKE SURE YOU ARE ALWAYS ACTING THE ETHICAL WAY, YOU SHOULD ASK YOURSELF:

- Is the decision consistent with the Code and Corporation policies?
- Am I treating others with respect and courtesy?
- Do my actions comply with the letter and spirit of the law?
- Are my actions in the Corporation's best interests?
- Will my actions or decision potentially harm the Corporation's reputation?
- Will I be embarrassed if my actions or decisions become public?
- Am I comfortable with being held responsible for my decision or actions?

If you are still not sure what to do, you are encouraged to seek the advice of your supervisor, your supervisor's manager, department or plant manager, human resources representative, the Ethics Committee, or contact the Ampco-Pittsburgh Compliance Line.

EXCELLENCE & ACCOUNTABILITY

SAFETY

Ensuring a safe workplace for all our employees and everyone who enters our facilities is the Corporation's number one priority. Safety-related incidents can be prevented, and we expect each employee and contractor to take personal responsibility for avoiding safety-related incidents, reporting unsafe conditions and near misses, and protecting their safety and that of their co-workers.

We operate our facilities in compliance with applicable health and safety laws and regulations. Our skilled and engaged workforce, comprehensive risk mitigation, and safety training programs, are each critical parts of our overall safety plan.

In addition, **every employee and contractor is empowered to Speak Up!, and immediately stop work that places any individual, equipment, or the workplace at risk.** In the event you **Speak Up!**, and your supervisor does not adequately address your concern, please **Speak Up!** again through other avenues, such as the plant manager, the Corporation's EHSS Manager or by contacting the Ampco-Pittsburgh Compliance Line.

To further reduce the possibility of safety-related accidents, you are expected to:

- **Speak Up!** and promptly report all safety-related incidents, unsafe conditions and near misses,
- Wear required or proper personal protective equipment
- Understand and follow laws and regulations as well as the Corporation's safety policies and procedures
- Actively listen to and participate in regular safety training and accident prevention programs
- Know what to do in the event of an emergency
- Keep the workplace free of alcohol and drugs (*including inappropriate use of prescription drugs*)
- Avoid verbal or physical conduct that could lead to violence or safety incidents

Speak Up!

Report safety-related incident, unsafe condition, or possible hazard, to your supervisor, your supervisor's manager, plant or department manager, the Ampco EHSS Manager or through the Ampco-Pittsburgh Compliance Line.

Workplace Violence

The Corporation has no tolerance for workplace violence, which includes any acts or threats of violence which could cause another person to feel unsafe. This includes verbal or physical assaults, threats, or acts of intimidation or aggression. No weapons are allowed in the workplace or in Corporation vehicles, and the weapons prohibition includes Corporation facility parking lots, to the fullest extent permitted by law.



THE ETHICAL WAY

In a part of my job, I have seen several near misses over the last year involving the placement of a ladder that provides roof access, and I believe relocation of the ladder would significantly reduce the risk of possible injury, what should I do?

All employees are encouraged to promptly report near misses as well as recommendations for minimizing all potential hazards to their supervisor, their supervisor's manager, or the appropriate plant manager or department manager. Safety matters can also be reported to the Ampco-Pittsburgh Compliance Line.

PREVENTING HARASSMENT & DISCRIMINATION

We respect and value all of our employees, and we expect you to treat fellow employees as well as customers, suppliers, and other business partners with respect and courtesy regardless of the situation. In addition, the Corporation is committed to keeping the work environment free of offensive, disrespectful, hostile, or intimidating behaviors.

The Corporation prohibits harassment, discrimination, and retaliation of any kind in the work environment or any other type of harassing, offensive, discriminatory, retaliatory, abusive, disrespectful, or violent behavior. Harassment is not only unlawful, but it also harms employee morale and damages our ongoing efforts to build a positive and inclusive work environment. Harassment can occur in many forms, including:

- Making jokes, slurs, or degrading comments about a person's physical appearance, race, gender, ethnicity, sexual orientation, or other categories protected by law
- Unreasonably interfering with a person's work performance or creating a hostile work environment
- Displaying or sending sexual, racial, or derogatory content
- Making unwelcome comments, flirting, touching, or making sexual advances
- Engaging in other threatening behaviors

The Corporation does not, nor do we expect our employees to tolerate harassment committed by suppliers, contractors, or customers. We also do not tolerate harassment among employees when they are interacting outside the office, engaged in corporate business at client or trade events, or via social media.

The Corporation makes decisions regarding recruitment, selection, evaluation, and promotion of employees and applicants based on qualifications, skills, work performance, leadership, and the Corporation's business needs. We will not tolerate discrimination or harassment in the workplace in any activity or form based on a protected category (i.e. race, color, age, sex, religion, gender identity, sexual orientation, national origin, citizenship, age, genetic information, disability, military or veteran status, pregnancy, marital or familial status, or any other protected category under applicable law.)



THE ETHICAL WAY

A colleague regularly comments on my clothing or my perfume. It makes me feel uncomfortable. I have even changed my work patterns to minimize contact during the day. I have asked her to stop, but she has not. What should I do?

Report your concerns to your supervisor or your HR representative. If you prefer, you can contact the Ampco-Pittsburgh Compliance Line. Inappropriate or unwelcome remarks of this type are unacceptable and can rise to the level of being a form of sexual harassment.

DIVERSITY & INCLUSION

We are committed to creating and maintaining an environment where personal dignity and differences are valued.

We are committed to building a more diverse, equitable, and inclusive workplace where all employees feel valued, are engaged, and can contribute to the Corporation's success. Our strengths lie in our differences, qualities, and characteristics that make us each unique, such as personality, race, education, age, lifestyle, ethnicity, thought processes, gender identity, national origin, religious affiliation, sexual orientation, military service, disability status, marital status, and work experience.

The Corporation's long-term success depends on embracing our differences, collaborating regardless of such differences, recognizing that challenges have multiple possible solutions, and realizing that our teams will do best when they reflect the diverse global communities we serve. Together, we are a stronger Corporation when we tap into our diverse experiences, knowledge, backgrounds, and perspectives.

HUMAN RIGHTS

The Corporation is committed to protecting and promoting human rights in our operations and throughout our supply chain. We do not tolerate prohibited child labor, forced labor, or any form of coercive or abusive practices regarding laborers. We acknowledge employees' rights to free association and collective bargaining. We also comply with the labor and employment laws and regulations in all countries where we operate.

The Corporation seeks to do business with those who demonstrate a similar commitment to promoting and respecting human rights and ethical conduct in all aspects of their business operations.

If you suspect or are aware that Corporation employees, independent contractors, or current or prospective business partners may be engaged in violating third parties' human rights, please promptly report such matter to your supervisor, plant or department manager, the Ethics Committee, or through the Ampco-Pittsburgh Compliance Line.

CONFLICTS OF INTEREST

We all must make sure our actions and decisions are always in the best interests of the Corporation. To meet that obligation, each of us must recognize and avoid any conflict of interest or an appearance of a conflict.

A "conflict of interest" can occur when your personal or family relationships, outside employment, or financial interests interfere in any way, or even appear to interfere, with the Corporation's interests. You must avoid, disclose, or report any situation that creates, or creates the appearance of, a conflict between the Corporation and you or any other corporate employee, officer, or director.

A conflict of interest can arise when you

- Take actions or have interests that conflict with your assigned duties
- Engage in activities that compete, or appear to compete, with the Corporation
- Improperly use corporate property, resources, information, or business opportunities for your personal benefit
- Have outside interests that interfere with your corporate duties
- Directly, or through a third party, receive any personal benefit (e.g., luxury travel, gift cards, loans, etc.) because of your actions or position
- Fail to provide complete and accurate information about relationships and business interests

Generally, having a conflict of interest is not a violation of the Code, but failing to avoid, disclose, resolve, or report an actual or potential conflict may be a violation. Therefore, you have an obligation to promptly disclose any actual or potential conflicts when they arise.

Your responsibilities

- Recognize when personal, family, romantic, social, political, financial, or nonbusiness relationships or interests could inappropriately influence you
- Avoid situations that may create, or appear to create, a conflict of interest
- Remove yourself from situations where a conflict or an appearance of a conflict may exist
- Promptly report any potential conflict of interest to your supervisor or manager
- Provide accurate and complete information about relationships and interests that may create a conflict of interest



THE ETHICAL WAY

I was recently promoted to an Assistant Buyer in the purchasing department. My brother-in-law represents XYZ Corp and has sold products to the Corporation for at least 10 years. If I am not responsible for purchasing the category of products sold by my brother, do I still need to make a disclosure?

Yes. You must disclose any relationship that may create the appearance of a conflict of interest. Your disclosure helps ensure that any potential conflict is avoided and provides the Ethics Committee a chance to review the matter and provide guidance.

PROTECTING CORPORATE ASSETS & OPPORTUNITIES

We are all responsible for protecting and ensuring the appropriate and efficient use of the Corporation's assets so that we can best serve our customers, operate profitably and efficiently, and create value for our shareholders. Our duty extends across a broad range of assets, including equipment, financial resources, electronic assets, confidential business information, corporate opportunities, trade secrets, and intellectual property. Your obligation also includes using corporate assets responsibly and efficiently, only for legitimate corporate purposes, and in accordance with Corporation policies, including the **Corporation's Information Security Policy**.

If you suspect or are aware of the possible loss, theft and misuse of Corporation, including the following:

- Unauthorized use of Corporation assets, equipment and vehicles for personal use;
- Loss of Corporation assets (e.g.- computers, PDA's cell phones);
- Misuse of corporate credit cards for personal use;
- Improper disclosure of confidential business information or intellectual property; and
- Falsification of timecards or receipts for reimbursement.

Take a moment to promptly report any loss, theft, or misuse to your supervisor, your supervisor's manager, plant or department manager, the Ethics Committee or through the Ampco-Pittsburgh Compliance Line.

DATA PRIVACY

The Corporation is committed to complying with all laws which protect the privacy and confidentiality of personal information that we collect and use in the operation of the business (e.g., GDPR). "Personal information" can include personal data of our employees, customers, suppliers and shareholders such as contact information, date of birth, employment data, government-issued identification numbers, compensation and performance information, medical information, and financial information.

If you are involved in the collection or processing of or otherwise have access to Personal Information, you are expected to comply with all laws and regulations and the **Corporation's Data Protection and Privacy Compliance Policy** and the **Data Protection Regulation Compliance Policy (Non-EU Jurisdictions)**, as applicable, in order to protect such Personal Information from improper use, disclosure or loss.

Your responsibilities include:

- Only accessing and using personal information that you need for legitimate business purposes;
- Limiting disclosure of personal information on a strict need-to-know basis to those with a legitimate business purpose and who have agreed to maintain its confidentiality; and
- Promptly reporting any suspected improper disclosure, use, or breaches of the Corporation's policies to your Human Resource manager.

CONFIDENTIAL INFORMATION

The Corporation's intellectual property, confidential business information, and trade secrets are among its most valuable assets and are critical to the Corporation's long-term competitive success. We are each responsible for protecting all confidential business information (including financial, technology, manufacturing, sales/marketing, human resources, or commercial), trade secrets, and third-party confidential information entrusted to us by the Corporation and its suppliers, customers or other business partners. Our responsibility for handling confidential information, which always applies both during and after your employment with the Corporation ends, includes:

- Protecting and also taking reasonable actions to prevent the unauthorized disclosure of confidential information,
- Never disclosing confidential information to any person outside the Corporation, including customers, suppliers, or even corporate employees, except on a strict need-to-know basis,
- Only disclosing confidential information to persons authorized by appropriate Corporation management and after such third party's execution and delivery of a confidentiality agreement which has also been approved by management,
- Never using confidential information for your own or any third party's benefit,
- Promptly reporting any suspected misuse, unauthorized disclosure, or loss of any confidential information or trade secrets
- Never using any third-party's confidential information without such party's prior express consent, or
- Disclosing any confidential information to any third-party whose is not authorized to receive such information under applicable US or foreign export laws and regulations.



THE ETHICAL WAY

As a supervisor, what are my responsibilities when working on a new project involving the Corporation's receipt of confidential information from a customer pursuant to a Non-disclosure Agreement between the Corporation and the customer?

First, you should ask the appropriate manager to share with you the scope of Corporation's confidentiality obligations. Generally, the obligations require the Corporation and employees to do the following:

- 1 Only share the third-party information within the Corporation on a strict need-to-know basis;*
- 2 Protect and safeguard the third-party information in the same manner as the Corporation uses to protect its own confidential information; and*
- 3 Promptly report any inadvertent or improper disclosure of the third party information in breach of the NDA.*

INSIDER TRADING IS PROHIBITED



The Corporation's common stock and warrants are publicly listed and traded on the New York Stock Exchange. Therefore, anyone who becomes aware of information that could be considered "material non-public information" about the Corporation or our suppliers, customers, or other business partners, has a duty to not use such knowledge for their own or a third-party's benefit.

"material non-public information" is information that has not been widely disseminated to the public, and a reasonable investor would consider such information important in making an investment decision whether to buy, sell or hold a particular security. Examples of "material non-public information" may include, but not be limited to, quarterly or annual earnings, key management changes, acquisitions, divestitures, gain or loss of key contracts, change of auditor, significant cybersecurity incidents, regulatory actions, or other key developments of the Corporation or any of its customers or suppliers.

Persons with access to material non-public information are considered "insiders." Under applicable law and Corporation policy, trading applicable securities while you are in possession of material non-public information relating to such securities is called "insider trading."

You are prohibited from using such material non-public information in the trading of securities, assisting others in using such information in the trading of securities, or otherwise sharing or "tipping" others who may trade in securities based on such information. In addition, "tipsters" can be liable under federal securities law even if they refrain from trading. This prohibition on insider trading also applies to your family members or anyone living in your household and any entities in which you control or influence investment decisions regarding securities.

It is your responsibility to comply with all securities trading requirements, and all employees are encouraged to review and become familiar with the Corporation's **Insider Trading Policy** before directly or indirectly trading in any form of Corporation securities. Trading securities based on material non-public information or "tipping" others is not only a serious violation of the Code but may cause you to be subject to significant civil and/or criminal penalties.

COMPLIANCE & ETHICAL CONDUCT

ACCURATE FINANCIAL RECORDS AND REPORTING

The Corporation's commitment to operating with integrity includes maintaining business books and records that fairly and accurately reflect the Corporation's financial condition and can be relied on by management and investors when making business and investment decisions.

Your responsibilities include:

- Confirming that all financial transactions are appropriately authorized, complete, accurate, and recorded in accordance with generally accepted accounting practices (GAAP)
- Ensuring that all business records, including contracts, production records, timecards, equipment maintenance logs are complete, accurate and properly recorded
- Processing transactions in a consistent and timely manner
- Ensuring that all business records in your custody or control are maintained, retained, and destroyed in accordance with all legal and regulatory requirements and the Corporation's records management policies and schedules, and all documents subject to a "Legal Hold" are retained for the length of the "Legal Hold"

We are each responsible for ensuring that neither financial transactions nor business records are ever falsified, misstated, concealed, or altered in any manner. In addition, we are also responsible for ensuring that financial entries and business transactions are properly authorized, executed, and recorded. Similarly, our internal auditors and independent auditors play an important role in ensuring the integrity of our books and records, so all employees are required to provide timely, accurate and complete information to the auditors.

Speak Up!

Speak Up! If you are concerned about the proper authorization, accuracy, or completeness of any Corporation record, you are encouraged to **Speak Up!** and report your question or concern to your supervisor or manager, the plant or department manager, the Corporation's finance department, the Ethics Committee or through the Ampco-Pittsburgh Compliance Line.

In addition to this Code, the Corporation has adopted accounting, finance, and procurement policies, including the **Code of Ethics for Senior Financial Executives**. For Corporation employees, who are responsible for corporate finance, accounting, or financial reporting, your in depth knowledge and compliance with the Corporation's policies and procedures concerning accounting, finance and procurement matters, including the Corporation's **Delegation of Authority Policy**, are critical to ensuring that the Corporation's financial statements and other corporate disclosures to the Securities and Exchange Commission (SEC) and other governmental agencies are timely, accurate, and complete.

FAIR AND HONEST DEALINGS

The Corporation's reputation for always pursuing **The Ethical Way** is built on the Corporation's long history of treating all customers, suppliers, and business partners fairly and in a straightforward manner.

When representing the Corporation, you must

- Provide truthful and accurate information regarding our products and services
- Never make false or misleading statements about our competitors or their products
- Carry out contracts in a fair manner consistent with our contractual obligations
- Ensure that the other party is operating a legitimate business
- Choose business partners who share our commitment to conducting business in **The Ethical Way**

Today's business environment can be challenging, and the marketplace has a significant number of parties attempting to engage in a constantly evolving array of fraudulent and illegal financial transactions while posing as customers, suppliers, or business partners. One common scheme is money laundering, which is a process where persons or entities attempt to conceal the proceeds of illegal activities (e.g., drugs, bribery, terrorism, tax evasion) or try to make the sources of funds appear legitimate. If you are responsible for corporate finance, accounting, or other domestic or foreign commercial activities, you must become familiar with and follow the Corporation's policies and procedures meant to identify and prevent the loss or theft of the Corporation's assets under false pretenses as well as help the Corporation avoid assisting third- parties with their money laundering and other fraudulent activities.



THE ETHICAL WAY

Tips on preventing money laundering include

- *Confirm all financial transactions involve clearly identified, legitimate business entities, and the identity of sources and recipients of funds is transparent*
- *Look out for "red flags" (e.g., party provides false or incomplete information regarding the entity, operations, or its principals), which may suggest money laundering or other financial crimes*

ANTI-BRIBERY & ANTI-CORRUPTION

The Corporation's commitment to doing business **The Ethical Way** means that bribery or corruption is strictly prohibited in any business dealing, regardless of location. The Corporation does not offer or provide any payments or items of value to or through any third-party, which could be interpreted as a bribe. Similarly, your receipt of payments or items of value, which could appear to affect your evaluation of business-related issues, is also prohibited. The only exception to this policy is a payment made when necessary to avoid imminent personal harm.

The Corporation prohibits employees and anyone working on the Corporation's behalf (e.g., agents, distributors, consultants, lobbyists) from offering, giving, requesting, or receiving any bribes or other improper payments, or creating the appearance of engaging in such conduct, regardless of whether the other party is a governmental official or a business partner. The Corporation's prohibition also extends to facilitation payments, which are payments made to a governmental entity to secure routine governmental action (e.g., - utility hook-ups).

Employees and those representing the Corporation must pay particular attention to the Corporation's compliance with the U.S. Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act, and the anti-corruption legislation of any other country implementing the OECD Anti-Bribery Convention. These laws prohibit the direct or indirect giving, offering, or promising money or any other item of value (e.g. gifts, travel/ entertainment, gift cards, employment opportunities, corporate sponsorships, donations to recipient's preferred charities) to a foreign governmental official for the purpose of obtaining or retaining business or gaining a competitive advantage.

If your job responsibilities involve establishing or overseeing business relationships involving the Corporation's engagement of third parties to assist in obtaining or retaining business, the granting of rights to distribute Corporation products, the establishment or ongoing management of joint ventures, partnerships or similar collaborations, you are responsible for being familiar with the Corporation's **Anti-Corruption Compliance Policy**, as well as the FCPA, the U.K. Bribery Act and other similar legislation; and complying with the Corporation's accounting, internal controls and oversight procedures.



THE ETHICAL WAY

What are some tips on helping the Corporation avoid fraudulent business partners and market activities?

- *Review Corporation policies and a customer's own policies before offering a gift or entertainment*
- *Ensure all transactions and relationships are established in strict accordance with the Code and the Corporation's policies, including the Corporation's Anti-Corruption Compliance Policy*
- *Avoid prospective business partners that have a reputation for bribes or improper conduct*
- *Follow Corporation due diligence procedures for evaluating prospective business partners*
- *Insist that all third-party representatives receive and comply with the Code*

GIFTS & ENTERTAINMENT

The exchange of business gifts or courtesies with customers, suppliers, and business partners must be carefully considered and reviewed in order to avoid the appearance of improprieties. For example, the Corporation does not permit the providing or receipt of any business gifts, courtesies, or entertainment that are of significant value, are frequently provided, or could appear inappropriate, illegal, or in conflict with the Corporation's **Anti-Corruption Compliance Policy**.

The Corporation does permit reasonable and limited expenditures for business gifts, courtesies, and entertainment, provided such gifts, courtesies, and entertainment which are infrequent, of reasonable value, related to appropriate corporate business objectives, and comply with Corporation's policies and procedures. Before any business gift, courtesies, or entertainment is provided or received, you must ensure that it is

- Permitted under applicable U.S. and foreign laws and regulations
- Not intended to influence a specific business decision or make the recipient feel obligated to reciprocate
- Reasonable in value and is given or received openly and transparently
- Related to proper Corporation business objectives and not intended to gain improper or preferential treatment or to obtain/retain business
- In compliance with both the Corporation's **Anti-Corruption Compliance Policy** and the other party's corporate policies
- Does not include cash or cash equivalents (e.g., - gift cards, commissions, bitcoin, etc.)
- Reviewed and approved by your manager and appropriate Corporation senior management
- Not intended as a direct or indirect gift for any governmental official



THE ETHICAL WAY

Any gifts, whatsoever, to governmental officials require the prior review and approval of the Corporation's Chief Financial Officer and Chief Executive Officer. For purposes of the FCPA and UK Anti-Bribery Act, the definition of persons who may qualify as government officials is very broad and may include

- 1 royal or ruling family members or their relatives*
- 2 government elected or appointed individuals and their staff, as well as civil servants, governmental inspectors, and regulatory agency officials*
- 3 officials with public international organization such as the World Bank, UNICEF, or the World Health Organization*
- 4 officers, directors, or employees of government-owned or controlled businesses, such as state-owned utilities, airlines, or other commercial businesses*
- 5 political party officials and candidates for office*

ANTITRUST & COMPETITION

The Corporation believes in and supports fair and healthy competition in all product categories and markets in which it competes worldwide. The Corporation is also committed to ensuring that all Corporation employees, agents, and representatives comply with the Corporations' **Global Antitrust and Competition Compliance Policy**. The Policy requires compliance with all applicable antitrust and competition laws, including laws and regulations prohibiting the restraint of trade, allocation of markets, bid rigging, unfair and anti-competitive business practices, group boycotts, agreements to limit production output across multiple competitors, monopolistic activities, and price collusion.

THE CORPORATION BELIEVES IN AND SUPPORTS FAIR AND HEALTHY COMPETITION IN ALL PRODUCT CATEGORIES AND MARKETS IN WHICH IT COMPETES WORLDWIDE.

The Corporation and its employees, agents and representatives must

- Always act independent of our competitors
- Avoid inappropriate communications or create the appearance of such improper communications with competitors or their representatives
- Minimize interactions with competitors and if required to interact at trade association meetings or similar events avoid discussions of competitively sensitive topics (e.g., - product pricing, production estimates, discounts/rebates, terms of sale, customers, production costs, etc.)
- Immediately withdraw from any exchange involving a competitor which violates applicable law or creates the appearance of an impropriety, and report all such incidents to the Ethics Committee for additional action, if needed

INTERNATIONAL TRADE CONTROLS

As a global business, the Corporation is subject to international trade laws, including those relating to customs, sanctions, embargoes, anti-boycott, and export control laws and regulations in multiple countries where we do business. For employees involved in the sale and transfer of goods and services across national borders, you must ensure that all business transactions comply with the applicable United States and international trade laws and regulations and the Corporation's **Export Controls and Sanctions Compliance Policy**.

You are always encouraged to seek guidance regarding any proposed transaction as violations of international trade laws carry severe penalties, which can also restrict future business opportunities and/or damage the Corporation's reputation.



ENVIRONMENTAL STEWARDSHIP

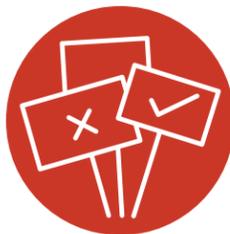
Our commitment to acting in *The Ethical Way* extends to ensuring that our businesses operate in an environmentally responsible manner. All employees of the Corporation are responsible for ensuring that the operations of each Company are fully compliant with applicable environmental laws and regulations. All employees' environmental obligations also extend to promptly reporting any possible violations of applicable environmental laws and regulations or any of the Corporation's environmental policies and procedures to their supervisor, their supervisor's manager, plant or department manager, the Ethics Committee or through the Ampco-Pittsburgh Compliance Line.

The Corporation is also firmly committed to the larger goal of being responsible stewards of the environment at large and the environment in the communities where we operate. In the long term, we believe that improving the environmental performance of the Corporation's manufacturing activities and our individual

product's environmental performance will make our businesses more globally competitive in the long term.

The Corporation is actively working to minimize our environmental footprint and improve our overall sustainability by surveying and evaluating existing programs across the Corporation with the goal of implementing energy conservation programs, reducing the carbon footprint of our product manufacturing processes, lowering CO2 emissions year over year, and increasing the reuse and recycling of materials.

We are also actively engaging employees in the identification of opportunities and projects which are focused on process enhancements. Employees with ideas and suggestions regarding our environmental stewardship are encouraged to share their thoughts and ideas with their supervisor, plant or department manager, or the Ethics Committee.

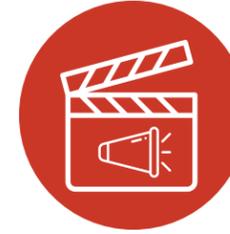


CAMPAIGN & POLITICAL ACTIVITIES

The Corporation encourages employees to participate in political activities as they see fit, on their own time, and using personal resources. The Corporation does not compensate or reimburse employees for any politically related activities.

The Corporation's policy is to refrain from contributing funds or anything of value to political parties, candidates for public office,

or elected officials, except in jurisdictions where such contributions are legal **and** approved by Corporation's Chief Executive Officer and Chief Financial Officer. Furthermore, without such approval, no Corporation asset may be used in direct or indirect support of any organization whose political purpose is to influence the outcome of a referendum or other vote of the electorate on public issues.

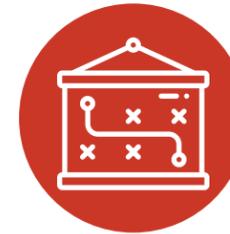


MEDIA INQUIRIES

The Corporation is committed to operating with integrity and transparency. We are also committed to providing the relevant facts, complying with applicable laws, and following established Corporation policies and processes.

If you receive questions from any media or press representatives seeking comment on behalf of the Corporation or about the Corporation's operations, business activities, financial results, or other events, you should:

- Politely and firmly decline the request to answer questions or provide opinions whether via an in-person, on-camera or phone interview
- Request the representative's contact information and the purpose of the call
- Promptly convey such information to the Director of Investor Relations and Corporate Communications or the Director of Human Resources



ADMINISTRATIVE MATTERS

Periodic Review and Revision

Management reserves the right to amend and revise this Code at its sole discretion. Employees will be apprised promptly of any changes to the Code or the policies, procedures, and obligations set forth herein.

No Rights Created

This Code is a statement of certain fundamental principles, policies, and procedures that govern our directors, officers, and employees in the conduct of the Corporation's business. It does not intend to create any rights in any employee, officer, director, customer, client, supplier, competitor, shareholder, or any other person or entity.

Adopted August 2022

