



## I. Purpose

The Code of Conduct and Ethics (the “Code”) is a guideline to empower our employees, officers, directors and partners across the globe to incorporate NN’s core values into all that we do.

### **NN’s Core Values:**

- **To demonstrate ethical behavior in every aspect of our business.**
- **To promote personal responsibility at every level.**
- **To ensure a safe and inclusive work environment for our employees where diversity is welcomed.**
- **To serve as a good corporate citizen in the communities in which we operate.**
- **To empower employees to do their best by recognizing innovation and superior performance.**
- **To create value for our employees, shareholders and customers.**

## II. Applicability

This Code applies to all NN operating units and all of its directors, officers, employees (including temporary employees), and third parties, including suppliers, service providers, agents and contractors. Third parties are expected to take appropriate actions to require their own suppliers, subcontractors, and agents to follow this Code when providing goods and services to NN.

## III. Statement from the Chief Executive Officer

At NN, we are committed to operating in accordance with our core values. We foster a positive culture and have a well-earned reputation for innovation and for doing business in a socially responsible and ethical way. This is essential for our continued success. Each of us is responsible for ensuring we uphold that reputation. As evidence of this commitment, we have established this Code which summarizes the principles to guide us each day as we make decisions that impact NN’s reputation with our customers, our suppliers, and our communities. Adhering to our Code also ensures that NN remains a great place to work, one that is welcoming, safe, and inclusive. I expect each of us to take the time to read the Code, understand it, and speak up if you are ever unsure about the right direction to take, or if you see something that doesn’t comply with our Code, our policies, or the law. Thank you for your commitment to NN and acting with integrity.

## IV. Noncompliance with the Code of Conduct and Ethics

Directors, officers, or employees who violate our Code, our policies, or the law may be subject to disciplinary action, up to and including termination. Certain violations may have additional consequences, such as fines, criminal prosecution, and jail time. We may choose to discontinue working with suppliers and third parties who are not in compliance with the Code.



The NN Compliance Team has the primary responsibility for investigation of all suspected violations of the Code, including final disposition of the case, decision to prosecute, and the decision to involve law enforcement or regulatory agencies. A waiver of compliance with our Code for executive officers or directors of NN may be made only by NN's Board of Directors or a Board committee acting on behalf of the Board and will be promptly disclosed to the extent required by law and the listing requirements of the NASDAQ. A waiver of our Code for all other employees may be made only by NN's Compliance Team.

All types of fraud or illegal activity, no matter how small, should be immediately reported to the NN Compliance Team as directed in the Speaking Up section. Do not discuss the matter with anyone outside of the Compliance Team, and do not attempt to investigate the matter yourself or hire an outside investigator.

### V. Our Responsibilities

Ethical behavior is more than just obeying the law, it is about using good judgement, making ethical choices, and doing what is right. All NN team members have the following responsibilities:

- Conduct all work activities in an honest and ethical manner.
- Treat everyone with respect and dignity.
- Be familiar and follow the Code and all NN policies applicable to your position. Periodically acknowledge your receipt of and compliance with the Code when required to do so.
- Be familiar and comply with laws, rules, regulations and contracts relevant to your job. If local customs or business practice conflict with the Code, the Code must be followed. If you have any questions about applicable laws, regulations, or a conflict between them and your obligations under the Code please consult your supervisor or the contacts provided in the Speaking Up section.
- Use good judgement and make ethical decisions. When confronted with an issue not specifically covered by the Code or when you are in doubt, please consult with your supervisor or the contacts provided in the Speaking Up section. It may also be helpful to ask yourself the following questions:
  - ✓ Does this potentially violate NN policy or applicable law?
  - ✓ Does this feel like the right thing to do?
  - ✓ Could it appear improper?
  - ✓ Would I feel comfortable explaining this to my family or peers?
  - ✓ Am I considering doing something because “everyone does it” or “no one will ever know”?
- Communicate your concerns regarding any actual or suspected illegal, unethical or unsafe conduct using the options in the Speaking Up section. Speaking up is the right thing to do! It might be tempting to think, “it’s none of my business” or “someone else will report this” but by speaking up, you are protecting yourself, your co-workers and the entire NN Team. All members of the NN Team are protected from retaliation for raising concerns in good faith. Please see the NN Non-Retaliation Policy.



- Cooperate fully with internal and external audits and investigations.

## **Responsibilities of Leadership**

The NN Management Team has the following additional responsibilities:

- Be a role model. Lead with integrity in your day-to-day actions and words.
- Demonstrate that compliance with the Code is more important than meeting expected business goals or results.
- Know the Code and be prepared to discuss the code with your team members.
- Create a safe environment where your team feels comfortable reporting their concerns to you. Respectfully listen to your team members and address their concerns.
- Reach out for help when needed using the options in the Speaking Up section.
- Be familiar and comply with the NN Non-Retaliation Policy.

## **VI. Valuing Our Team**

NN is committed to maintaining a corporate culture that respects the value and dignity of every individual.

### **Diversity, Equity and Inclusion**

NN is committed to ensuring a safe and inclusive work environment free from harassment and discrimination based on any elements of diversity, including race, sex, color, national origin, ethnicity, religion, age, physical or mental disability, sexual orientation, gender identification or expression, citizenship status, veteran status, marital status, genetic information, or any other status protected by applicable law. Qualifications, performance, skills and experience are the basis for recruitment, hiring, placement, development, training, compensation and advancement in the Company.

### **Labor Relations**

NN respects the rights of employees to form, join or not join labor unions. This includes the right to freedom of association and collective bargaining. Our employees have the right to fair working conditions, competitive wages and reasonable working hours.

### **Harassment**

Harassment is not tolerated at NN. Harassment may take many forms, including spoken words; displaying or distributing inappropriate text or pictures, either electronically or on paper; using social media as a harassment platform; and physical actions such as gestures or unwanted contact. While we cannot provide a complete list of every form of harassment, examples of prohibited conduct include:

- Discrimination against an employee based any element of diversity as described above.
- Jokes or slurs based on elements of diversity, both spoken and written.
- Bullying, threats, intimidation, coercion, hazing or any violent behavior.
- Sexual advances, jokes, comments or other offensive materials or physical behavior.
- The display of inappropriate graphics on clothing, jewelry, decals or tattoos.



- The use of social media to target coworkers.

If you experience or witness any form of harassment, please speak up using the options in the Speaking Up section of the Code.

### **Workplace Violence**

Violence of any kind has no place at NN. The possession of weapons of any type is not allowed at any NN property unless specifically authorized by an officer of the company. Violent activities include:

- Threatening or intimidating others, whether physically or verbally.
- Causing injury to another.
- Acts of vandalism or arson.

If you witness or experience any type of violence in the workplace, please report it immediately as outlined in the Speaking Up section. If there is a risk of imminent harm, please contact local law enforcement.

### **Substance Abuse**

Possession, use, or distribution of illegal drugs or controlled substances are not allowed on NN property. Working while impaired by illegal substances, alcohol, prescription or non-prescription medication is a safety hazard and is not permitted. Please consult with your doctor regarding the impact of prescription or non-prescription medication you are taking and communicate any concerns to your supervisor or human resources.

### **Health and Safety**

Providing a safe work environment for our team is one of NN's core values. We all have a responsibility to take care of our own safety and to look out for one another. Employees are expected to obey all health and safety laws and related Company policies. Employees have the right to stop working on any task that feels unsafe. If you identify a safety hazard, immediately report the safety risk to your supervisor or by using the options provided in the Speaking Up section. All injuries, whether to yourself or a coworker, must be immediately reported to your supervisor. Employees that drive company vehicles or on behalf of the company are prohibited from distracted driving caused by texting, phone usage, eating or any other activity. Please refer to the Environmental Health and Safety Policy and Procedures for more information on health and safety at NN.

### **Protection of Personal Information**

At NN, we respect the privacy of our employees, suppliers, customers and everyone with whom we conduct business. In all areas in which we operate we adhere to principles of data minimization, purpose limitation, accuracy, maintaining the integrity of personal data and safeguarding private information, even where third parties are used for payroll processing or other services. Data privacy laws in jurisdictions in which we operate dictate how we must collect, use, share, maintain and dispose of personal data, and we are compliant with those laws. Please keep your own personal information safe and secure and use care when providing personal and confidential information to others. If your role requires that you have access to any team member's personal identification, ensure you follow legal requirements and NN's Privacy Policy. Please refer to the NN Privacy Policy for more information.



## VII. Doing the Right Thing

### Product Safety and Quality

Investing in our customers' success means that we never compromise on product safety and quality. Compliance with NN's quality processes and safety requirements is essential. Our employees are empowered to identify and report potential quality issues and encouraged to take an active role in the innovation of our processes and the continuous improvement of our products. Counterfeit parts should never be purchased or used in production.

### Bribery & Kickbacks

Bribes and kickbacks are unethical, illegal, and go against our values. Violating laws—such as the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, PRC Anti-Unfair Competition Law, anti-money laundering and other anti-corruption laws—may result in criminal penalties or fines for you and NN.

NN prohibits you and any third parties acting on NN's behalf from paying bribes and kickbacks to obtain business or preferential treatment. NN also prohibits its employees, directors, officers and third parties from receiving or soliciting bribes or kickbacks. Any offer of a payment or anything of value to influence a business decision or government action could be considered a bribe or kickback. This includes money, offers of employment and the gifting of goods and services. An employee must never, directly or through a third party, offer, request, accept, or indicate a willingness to accept or offer such a payment. Unofficial fees to government officials made to expedite routine government actions such as processing papers or issuing permits are prohibited.

### Gifts & Entertainment

The purpose of business entertainment and gifts in a business setting is to create goodwill and sound working relationships, not to gain an unfair advantage with customers or suppliers. The following practices are not allowed with third parties:

- Giving or accepting a gift of cash, gift cards or gift certificates.
- Giving or accepting any gift or entertainment that could reflect negatively on the Company's reputation.
- Giving or accepting gifts that are expensive or frequent.
- Providing entertainment that has no reasonable business purpose.
- Giving or accepting gifts to influence or appear to influence the recipient.
- Giving any gift to a government official.

### Our Business Partners

NN is committed to lawful, ethical, honest and fair practices in our relationships with customers, suppliers and other business partners. We expect all employees to be honest, transparent and act with integrity in all interactions with customers and suppliers. We strive to deliver what we promise to our customers. We expect our customers and suppliers to uphold our values presented in the Code and to comply with all applicable laws. We will not knowingly conduct business with anyone involved in illegal activities such as bribery, fraud or money laundering. We should notify NN Compliance if we believe a business partner is not meeting these expectations.



Engaging in business transactions with third parties who are involved in criminal behavior may be considered money-laundering and result in criminal fines and penalties for you and NN. NN expects all persons choosing business partners to take care in the selection of ethical companies and individuals.

### **Conflicts of Interest**

A conflict of interest may exist when you are involved in activities that might interfere, or appear to interfere, with your ability to make business decisions in the best interest of the Company. While a complete list of every conflict of interest would be impossible to provide, examples include:

- Supervising an employee that you have a close personal relationship with, such as a relative, close friend or partner.
- Choosing a supplier based on an ownership interest or personal relationship. Suppliers should be chosen based only on quality, reliability, performance, price or other business needs to avoid potential or perceived conflicts of interest.
- Having an employment or other personal relationship with a supplier, customer or competitor.
- Performing personal activities or activities for another employer during working hours.
- Using company assets for personal benefit.

If you become aware of a potential conflict of interest, you should bring it to the attention of your manager or use one of the options provided in the Speaking Up section.

### **Insider Trading**

If you have material, non-public information relating to NN, it is our policy that neither you, nor any person related to you, may buy or sell securities of the Company or engage in any other action to take advantage of, or pass on to others, that information. This also applies to trading in the securities of any other company, including our customers or suppliers, if you have material, non-public information about that company which you obtained in the course of your employment by NN. Even the appearance of an improper transaction must be avoided to prevent any potential risk to NN, Inc. or the individual trader. Violations of insider trading laws may be punishable by fines and imprisonment.

Besides the obligation to avoid trading in the Company's securities while in possession of material, non-public information, you are also prohibited from "tipping" others. The concept of unlawful tipping includes passing on information to friends or family members under circumstances that suggest that you were trying to help them make a profit or avoid a loss.

Additionally, if you are a Director, Officer or hold a key position in the Company, you are subject to stringent SEC reporting requirements. You therefore must obtain clearance from the Approving Officers before you make any transaction in the Company's securities.

See the Company's Insider Trading Policy for more details.

### **Our Competition**

At NN, we believe we should act with integrity in all business dealings, including those involving our competitors. We comply with the laws that protect fair competition, also called antitrust laws, which prohibit conduct that may restrict competition. Antitrust laws are complex. If you



have any questions regarding whether or not conduct is permitted, please reach out to the NN Compliance Team or the General Counsel. Whether formal or informal, written or verbal, agreements to restrict competition are illegal. These agreements can take many forms, such as an agreement among competitors to: set or change the pricing of a certain part; limit or restrict the production of a certain part; divide customers or markets amongst themselves; not hire or solicit each other's employees; raise, lower, or maintain salaries of employees; collaborate or coordinate on the bidding process for a customer program. Do not discuss confidential information with competitors, such as price, contract terms, customer data, or marketing plans without first discussing with NN Compliance or General Counsel.

We should treat our competitors with the level of respect and professionalism that we would expect from them. Deception or fraud is not to be used to obtain information from or about our competitors.

### **Sustainability**

We believe in being a good corporate citizen in the communities we serve. We are taking proactive measures designed to minimize our impact on the environment and to ensure we operate responsibly. As employees, we can do our part by:

- Complying with all environmental laws, policies, permits and regulations.
- Conserving energy, water and other resources.
- Developing innovative strategies to reduce our environmental impact.
- Immediately reporting any incidents or conditions which could have an adverse environmental impact using the guidelines provided in the Speaking Up section.

### **International Trade Regulations**

NN must operate in compliance with various trade laws in the countries in which we operate. Trade laws include export controls, customs and other import/export regulations and restrictions. Failure to comply with these laws may seriously impact our business.

At NN we all play a part by:

- Creating and maintaining accurate and complete customs documentation for all global jurisdictions.
- Classifying and valuing imported and exported items correctly.
- Marking products with the correct country of origin and other requirements.
- Reviewing our products, technology, software, hardware and services to determine which items require government authorization for export.
- Obtaining all required import and export licenses.
- Knowing the third parties with whom we do business and checking whether they are subject to sanctions or trade restrictions.

Remember that exports do not always involve physical transport of an item. They can occur when software, data and technology is shared outside the country or with foreign nationals working inside a country. Exporting can occur when persons access shared drives, visit NN facilities, or communicate by email, phone or in person.

### **Sanctions**



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Many countries sanction transactions with designated individuals, entities, organizations, countries, or geographic regions. Every NN operation must comply with the terms of economic sanctions imposed under U.S. and other applicable laws. These regulations prohibit dealing with designated countries, governments, entities, and people that threaten national security or foreign policy interests. Examples include parties that support terrorism, traffic in narcotics, engage in the proliferation of weapons of mass destruction, or suppress human rights. You may not do business or facilitate business, either directly or indirectly, with any country, government, entity, or person sanctioned under these laws. Violations of economic sanctions can lead to severe penalties for you and NN. You must comply with all applicable law in the course of your work. Critically, if you are concerned that a transaction may involve a sanctioned party or simply have questions about whether this is the case, you must discuss with your manager, the NN Compliance team, or the General Counsel.

### **Human Rights and Forced Labor**

We do not tolerate the use of child labor, forced labor, bonded labor or human trafficking of any kind. This includes violations of human rights and forced labor within our supply chain. NN suppliers and other third parties must adhere to this standard themselves and require these standards of their own suppliers and other third parties.

### **Money Laundering**

Money laundering involves hiding illegal activities by moving funds through legal businesses. If something is purchased using stolen money, it is criminal property. We must operate in compliance with all applicable money laundering laws. This means we should know the third-parties that we do business with, and look out for any of the following red flags:

- Requests to ship to a different company or third party than the party you are dealing with.
- Requests to ship to a different country than where the payment originated.
- Suppliers with multiple tax IDs, unverified documents or a reluctance to provide information.
- Irregular money transfers, cash payments or paying in a different currency than noted on the invoice.

### **Political Activities**

We encourage our employees to participate in the political process, however Company time and resources may not be used to do so. Avoid speaking on behalf of the Company regarding political activities or causes. Donations to political causes, campaigns or candidates may not be made with Company funds.

## **VIII. Safeguarding Our Assets and Information**

### **Safeguarding Company Assets**

We are all entrusted with the care of Company assets, which include everything that NN owns or uses to conduct business, including intellectual property. Company assets should be dealt with in the following manner:

- Company assets should be used for proper business purposes and never loaned, given, leased, sold or destroyed without proper management approval in accordance with Company policies.
- We all have a responsibility to avoid waste and damaging Company property through carelessness or poor maintenance.



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- We comply with all laws that govern the protection of Company assets.
- Follow all security procedures and never share security badges or passwords with others.
- Theft of company assets is never allowed and may be reported to the appropriate civil authorities.
- Limited personal use of phones and computer systems is allowed as long as it does not negatively impact your performance or productivity or violate the Code or other NN policies.

### **Confidential Information**

We all have a duty to protect NN's reputation, competitive advantage and the relationships with our business partners by carefully handling confidential information. Below are some examples of confidential information that you may have access to in the course of your work:

- Information regarding our manufacturing processes, products, customers and upcoming projects that give NN a competitive advantage.
- Financial information that has not yet been published through public filings.
- Employee personal data.
- Information provided to us in confidence by our customers or suppliers.

These are some steps we can all take to protect confidential information at NN:

- Sensitive company information should not be discussed in public places, such as restaurants or elevators.
- Confidential information should not be sent to or from personal email accounts or instant messaging platforms.

Confidential information should only be used for legitimate business purposes.

- Never disclose confidential information without approval from Senior Management.
- If you feel confidential information is being discussed or published publicly without the approval of Management, please report this using the guidelines provided in the Speaking Up section.

### **Speaking on Behalf of the Company**

When communicating with the public and our stakeholders, it is important that we convey clear, consistent messaging. Please consult senior management before accepting engagements to speak with or write articles for the media. Do not give the appearance of representing the company unless you have been given express permission by the company to do so. Be mindful of messaging when using social media platforms that identify you as an NN employee. Do not post anything that is confidential or discriminatory. Do not post pictures of company premises, processes or employees without the Company's permission.

### **Cybersecurity**

Ransomware and other cyberattacks can cause significant disruptions to businesses. At NN, we have many preventative measures in place to ensure our company, employees, customers



and suppliers are protected. We all play a part in keeping the company data safe from these threats.

- Never share your password with anyone inside or outside of the organization. Management will never ask you for your password. If you are asked to provide your password, report the request immediately following the guidance in the Speaking Up section.
- Never write your passwords down and leave them in an unsecure location on or around your work area.
- Guard yourself against phishing attempts. Learn to recognize an email aimed at tricking you into providing your password and use the “Report Phishing” button in Microsoft Outlook to report the attempt. Never enter your username or password in response to an email.
- Avoid clicking on links or opening attachments in emails with the yellow caution banner stating the email is from outside of NN unless you are confident the sender is legitimate.
- Never use personal devices to conduct business, such as personal computers, phones or tablets.
- Never conduct business using personal email or messaging apps.
- Keep all company laptops and mobile devices physically secure.
- Promptly complete all cybersecurity training when directed by Management.

### **Business and Financial Records**

Our stakeholders rely on us to provide complete, meaningful and accurate information in our public filings. We also use our business and financial records to make informed decisions in all aspects of our business, so it is important that our records be accurate and properly maintained. All employees have an impact on keeping good records.

- Timesheets and expense reports should be completed honestly.
- Quality and safety reports should be complete and accurate.
- Production and inventory records should be maintained with care and never falsified.
- Shipments should never be recorded early or for items not sold.
- Only sign contracts or documents that you are authorized to sign, and do not backdate contracts.

Members of our finance team have a special responsibility to report financial data honestly and accurately.

- Financial reporting should be in compliance with generally accepted accounting principles and applicable laws.
- The nature of all financial transactions should be clearly documented and supported.
- Our reporting processes should adhere to our internal controls and company policies.
- Never conceal information from internal and external auditors.



Report any concerns regarding financial misconduct or the misreporting of other business data using the guidelines provided in the Speaking Up section.

### IX. Speaking Up

At NN, we believe everyone's voice should be heard. In this section you will find the resources available to you if you have questions or concerns. When you believe someone has violated the law, the Code or our policies, or has engaged in unethical or unsafe behavior, you should speak up immediately. Issues can only be resolved if they are brought to someone's attention.

#### How to Speak Up

**Supervisor** – Your immediate supervisor is the best place to start because they are in a position to best understand your concern and resolve the issue quickly.

**Plant or Division Management** – If your concern involves your supervisor, or if you feel like your supervisor has not addressed the issue, you may contact your Plant Manager or other Group Leadership with your concerns.

**Human Resources** – If your concern involves pay, benefits or another human resource concern, or if you feel that your previously reported concern has not been addressed, you may reach out to your Human Resources representative.

***We also offer the following resources outside of your business group. These resources should be used for concerns regarding potential corruption, fraud, hazardous, unethical or illegal activities or other legal or policy violations. These types of matters should be reported immediately. Do not attempt to conduct your own investigation.***

**NN Compliance Team** – [NNCompliance@nninc.com](mailto:NNCompliance@nninc.com) – The NN Compliance Team can assist you with policy and legal matters, if your previously reported concerns have not been resolved or if you feel uncomfortable voicing your concerns to one of the resources above. You may also report potential unethical or illegal conduct to this email. When using this email, we will have your email address, so it is best not to use this method if you wish to remain anonymous.

**Whistleblower Hotline** – You may either email or call the Whistleblower Hotline, and you may remain anonymous if you wish. Calls to this hotline can be made in multiple languages. The hotline is open 24 hours per day, 7 days per week.

#### By Phone:

**Brazil 02-12038-5412**

**China 40-0120-0352**

**France 08-00-90-01-14**

**Mexico 80-0872-1778**

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**Poland 80-000-54-80**

**United States 877-888-0002**

**Online:**

Please visit [www.nninc.ethicspoint.com](http://www.nninc.ethicspoint.com) or scan:



Please see the NN Whistle Blower Policy for more information on reporting.

### **Non-Retaliation**

NN is committed to providing a safe environment for employees to voice their concerns. We will not tolerate retaliation against anyone who, in good faith, speaks up or takes part in an investigation about actual or suspected violations of the law, the Code or a company policy. Please see the NN Non-Retaliation Policy for more details.

### **What Happens Next**

After a report is made, an investigation will be conducted to determine the facts. The Compliance team may reach out to you for more information. If you report anonymously, you will receive a code so that we may send you messages and you may respond without revealing your identity. Please cooperate with any ongoing investigation. After the investigation, the Company will determine the best course of action. We will acknowledge the receipt of your report, and keep you informed of the progress of the investigation. We will notify you when the investigation has concluded, but we may be unable to disclose the particular details or outcome of the investigation.

### **Contacting Other Agencies**

Nothing in the Code or any other NN Policy limits your ability to communicate with or provide information to any governmental agency or commission, including the Securities and Exchange Commission, regarding possible legal violations, without disclosure to the Company, as protected under whistleblower laws.

## **X. Additional Information**

This policy reinforces and supplements information contained in our Whistle Blower Policy and our Non-Retaliation Policy, which can be found on the NN, Inc. website at <https://www.nninc.com/code-of-ethics/>.

*Revised 15 JAN 2025*