



NN, INC. WHISTLE BLOWER POLICY

I. Purpose

The NN Whistle Blower Policy serves to ensure all employees, directors, officers and third parties of NN, Inc. are aware of the protections available under this policy and any applicable whistleblower laws, and to encourage the reporting of concerns regarding potential violations of applicable law, our Code of Conduct and Ethics, or company policies. This policy describes the Problem Resolution Process and affirms the Company's position that retaliation of any type will not be tolerated against any person who raises a concern in good faith.

II. Applicability

This policy applies to all NN operating units and all its directors, officers, employees (including temporary employees), and third parties, including suppliers, service providers, agents and contractors.

This Policy and applicable Whistleblower laws cover reports that are made regarding corruption, fraud, hazardous, unethical or illegal activities. General or personal grievances are not protected by this policy or whistleblower laws and should be reported using the guidelines in the Problem Resolution Process.

Nothing in this 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.

III. Whistleblower Hotline

NN is committed to high ethical standards and compliance with all applicable laws in all the jurisdictions in which it operates. The Company requires all employees to promptly report potential illegal activity or activities that potentially violate the Company Code of Conduct and Ethics or its policies. Prompt reporting of possible violations is required as it gives the Company the opportunity to investigate the matter and take corrective action where needed.

NN has established a Whistleblower Hotline for employees and third parties to:

- Confidentially report suspected violations of applicable law.
- Confidentially report potential violations of our Code of Conduct and Ethics or our policies.
- Obtain guidance and clarification on matters related to the NN's compliance and ethics program.

Reports may be made anonymously where allowed by law. An employee or third party who has a good faith belief that an NN employee or someone acting for or on behalf of the Company has violated applicable law, the Company Code of Conduct and Ethics, or company policies has a duty to report the matter as promptly as possible. Good faith does not mean that a reporter must know with certainty that an allegation is true. Rather, it requires that the reporter has a reasonable belief



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their allegation could be true, and the report is being made without malicious intent. Submitting a report that is known to be false is a violation of the Company Code of Conduct and Ethics and will result in discipline up to and including potential termination from employment.

IV. Non-Retaliation

Employees and others who report potential issues should feel comfortable reporting issues of potential noncompliance without fear. Retaliation of any type against a person who, in good faith, raises a concern will not be tolerated. Anyone who attempts to retaliate against a person for speaking up will face discipline, up to and including potential termination from employment.

V. Our Responsibilities

The NN Compliance Team is responsible for:

- Ensuring the Whistleblower Hotline is accessible to all employees and third parties either by computer or by phone in all the languages used by the company.
- Acknowledging the receipt of the whistleblower complaint and providing appropriate feedback during the investigation.
- Ensuring appropriate personnel conduct a comprehensive investigation in connection with matters that are reported through the hotline and supervising such investigations to ensure they are thorough and accurate, and the findings are communicated to appropriate parties for consideration of whether corrective action and/or discipline is warranted.
- Ensuring that confidentiality is maintained to the fullest extent possible for all information connected to any such investigation.
- Ensuring the Company maintains a log of all reports, tracking their receipt, investigation, and resolution.
- Reporting a summary of investigations and outcomes to the Audit Committee.
- Notifying the reporter at the conclusion of the investigation, although due to privacy regulations we may be unable to disclose particular details or the outcome of the investigation.

All managers and supervisors are responsible for:

- Maintaining an open-door policy. Every manager or NN representative who receives a report is required to treat the concern or allegation with discretion, and to treat the employee who raised the concern with respect without any type of retaliation for having done so in good faith.
- Promptly reporting any violations of applicable law or the Code of Conduct and Ethics reported to them to the NN Compliance Team. Managers should never conduct investigations themselves.
- Leading by example and demonstrating a culture that values speaking up.
- Ensuring their staff members are informed about how to access the Whistleblower Hotline and encouraging them to use it.



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- Supporting all employees who are involved in or otherwise assisting with an investigation and protecting their confidentiality.

All covered persons are responsible for:

- Promptly reporting any potential compliance risk or potential violation of the law, Code of Conduct and Ethics, or Company policies or procedures using the reporting channels made available by the Company in the **Problem Resolution Process**, including the Company's Whistleblower Hotline.
- Promptly reporting any instance of suspected retaliation against yourself, any company employee, or any other person for having spoken up in good faith to report a concern. Please refer to the Company's Anti-Retaliation Policy for more information.

VI. Problem Resolution Process

NN recognizes that any employee can experience problems at work. NN is committed to providing the best possible working conditions for its employees and as part of this commitment encourages an open and honest atmosphere in which any problem, complaint, suggestion, or question receives a timely response. NN has adopted the following procedures to effectively resolve any issues that may occur.

Your 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 that 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 – The NN Compliance Team can assist you with policy and legal matters and can assist you 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.



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By Phone:

Brazil 02-12038-5412

China 40-0120-0352

France 08-00-90-01-14

Mexico 80-0872-1778

Poland 80-000-54-80

United States 866-388-1607

Online:

Please visit www.nninc.ethicspoint.com or scan:



VII. Additional Information

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

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