## NN, INC. NON-RETALIATION POLICY



NN, Inc. is committed to providing a workplace conducive to open discussion of its business practices. It is Company policy to comply with all applicable laws that protect

employees against unlawful discrimination or retaliation by their employer as a result of their lawfully reporting information regarding, or their participating in, investigations involving corporate fraud or other violations by the Company or its agents of federal or state law. Specifically, Company policy prevents any employee from being subject to disciplinary or retaliatory action by the Company or any of its employees or agents as a result of the employee's:

- disclosing information to a government or law enforcement agency, where the employee has reasonable cause to believe that the information discloses a violation or possible violation of federal or state law or regulation; or
- providing information, causing information to be provided, filing, causing to be filed, testifying, participating in a proceeding filed or about to be filed, or otherwise assisting in an investigation or proceeding regarding any conduct that the employee reasonably believes involves a violation of:
  - federal criminal law relating to securities fraud, mail fraud, bank fraud, or wire, radio and television fraud, or
  - > any rule or regulation of the Securities and Exchange Commission, or
  - > any provision of federal law relating to fraud against shareholders,

where, with respect to investigations, such information or assistance is provided to or the investigation is being conducted by a federal regulatory agency, a member of Congress, or a person at the Company with supervisory or similar authority over the employee.

• reporting suspected violations of the Company's Code of Business Conduct and Ethics Statement or other violations of Company policies.

However, employees who file reports or provide evidence which they know to be false or without a reasonable belief in the truth and accuracy of such information will not be protected by the above policy statement and may be subject to disciplinary action, including termination of their employment.

In addition, except to the extent required by law, the Company does not intend this Policy to protect employees who violate the confidentiality of any applicable lawyer-client privilege or physicianpatient privilege to which the Company or its agents may be entitled under statute or common law principles, or to protect employees who violate their confidentiality obligations with regard to the Company's trade secret information. Employees considering providing information that may violate these privileges or reveal Company trade secrets are advised to consult an attorney before doing so.

The Company has designated the Vice President, Internal Audit & Chief Compliance Officer as the Company officer responsible for administering this Policy.

Employees are encouraged to discuss issues and concerns of the type covered by this Policy with their supervisor, who is in turn responsible for informing the Vice President, Internal Audit & Chief Compliance Officer or the Senior Vice President and General Counsel of any concerns raised. If the employee prefers not to discuss these sensitive matters with his or her own supervisor, the employee may instead discuss such matters with the Vice President, Internal Audit & Chief Compliance Officer or the Senior Vice President and General Counsel. The Vice President, Internal Audit & Chief Compliance Officer or the Senior Vice President and General Counsel. The Vice President, Internal Audit & Chief Compliance Officer will refer complaints of retaliation submitted, as he or she determines to be appropriate or as required under the directives of the Board of Directors (or a Committee of the Board), to the Board or an appropriate Committee of the Board.

The Company's Vice President, Internal Audit & Chief Compliance Officer, Elvin Tyler, may be reached at 980.264.4349, or at <u>elvin.tyler@nninc.com</u>. The Company's the Senior Vice President and General Counsel, Matt Heiter, may be reached at 980.264.4381 or at <u>matt.heiter@nninc.com</u>. If any employee believes he or she has been subjected to any action that violates this Policy, he or she must file a complaint with his or her own supervisor, the Vice President, Internal Audit & Chief Compliance Officer, the Senior Vice President and General Counsel, or the Company's Senior Vice President and Chief Human Resources Officer.

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