



## I. Purpose

The Code of Conduct and Ethics Policy (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 invest in our customers’ success.**

## 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 follow this Policy when providing goods and services to NN.

## III. Statement from the Chief Executive Officer

The success our Company has experienced has been the direct result of our commitment to building and maintaining a culture that places ethical conduct and the fair treatment of employees, customers, and investors at the core of all our business dealings. This philosophy informs many of our guiding principles, including the Company’s mission, vision, and core values.

We believe our employees, officers, and directors have a responsibility to behave ethically, and to treat one another with dignity and respect. We are the stewards of our Company’s credibility and reputation, which means that each of us is responsible for setting an example of personal integrity in the way we conduct business and interact with others. The key concepts that guide our behavior as a Company are summarized in this Code of Conduct and Ethics.

The purpose of this Code is to provide guidance and address questions that may arise regarding compliance with this Code. The responsibility to behave ethically also includes reporting suspected violations of compliance with this Code; if you have any information or knowledge of any prohibited act, you must promptly report such matters to your supervisor, the site’s human resource department, the Vice President of Internal Audit & Chief Compliance Officer, Senior Vice President & Chief Human Resources Officer or Senior Vice President and General Counsel. The Company has established an anonymous hotline and



online reporting tool for reporting suspected violations of this Code. Please consult the NN, Inc. Whistle Blower Policy for details.

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

Employees who violate the law, our Code, or our policies 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.

## 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 of Conduct and Ethics 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 local law conflicts with the Code, local law must be followed. If you have any questions about applicable laws, regulations or contracts, please consult with 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, a contract or an 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.
- If the reported issue involves any type of fraud or illegal activity, do not attempt to investigate the matter yourself or hire an outside investigator. Immediately contact the NN Compliance Team as directed in the Speaking Up section.

## **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. For more information, please see the NN Human Rights Policy.

### **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. We do not tolerate the use of child labor, forced labor, bonded labor or human trafficking of any kind.

### **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.

## **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.

### **Bribery & Kickbacks**

Bribes and kickbacks are illegal and may be subject to criminal penalties in most countries. The U.S. Foreign Corrupt Practices Act (FCPA) prohibits giving anything of value, directly or indirectly to officials of foreign governments or foreign political candidates to obtain or retain business or to obtain preferential treatment from such persons. 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.

Sometimes it can be difficult to determine if an entertainment activity or gift would violate the Code. Please contact your manager or one of the options in the Speaking Up section if you are unsure whether a proposed gift or entertainment activity is appropriate.

### **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 suppliers to uphold our values presented in the Code and to comply with all applicable laws.



## **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 Senior Vice President and General Counsel 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 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. Do not discuss confidential information with competitors, such as price, contract terms, customer data, or marketing plans.



## **Sustainability**

We believe in being a good corporate citizen in the communities we serve. In 2022, we published our inaugural Sustainability Report. At NN, 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.

## **Trade Regulations and Money Laundering**

NN must operate in compliance with various trade laws, economic sanctions, and anti-money laundering regulations in the countries in which we operate. Failure to comply with these laws may seriously impact our business. If your area of responsibility involves dealing with these laws, please be mindful of the various regulations and reach out to the Legal Department with questions.

## **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.
- 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:

**In the US, please dial toll-free 877-888-0002**

**Internationally, please dial collect 770-810-1147**

## 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 due to privacy regulations 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/>.