



## I. Purpose

The Non-Retaliation Policy serves to protect all employees of the Company from any form of retaliation for speaking up about a potential compliance issue. This policy reinforces the Company's commitment to ensuring a speak-up culture where all employees feel safe raising issues and concerns without fear of being retaliated against for doing so.

Any employee who, in good faith, reports a suspected violation, assists in the investigation of a potential issue, or requests information or clarification about the proper interpretation or application of any law, our Code of Conduct and Ethics, or any company policy should be able to do so freely and without worrying they will be retaliated against as a result. This includes disclosing information to a government or law enforcement agency or participating in an investigation, where the employee has reasonable cause to believe that the information discloses a violation or possible violation of applicable law.

## II. Applicability

This policy applies to all employees, directors and officers, as well as those acting on behalf of NN, Inc. Any employee who violates this policy is subject to disciplinary action, up to and including termination, to the extent permitted by local law.

## III. Retaliation

For purposes of this policy, "retaliation" means any adverse action, or threat of adverse action, against an employee because they do, or are about to do, any of the following: file a complaint, raise a concern, provide information, or otherwise assist in an investigation or proceeding relating to any issue they reasonably and in good faith believe to be a potential violation of the Company's Code of Conduct and Ethics; any Company policy or procedure; or any applicable law, rule, or regulation. Retaliation can take many different forms, but all forms are designed to punish or penalize a person for speaking up. Some types of retaliation are obvious. For example, an employee raises a concern, and because of this:

- Their employment is terminated.
- They are transferred to a less desirable shift, location, or job.
- Their job responsibilities are reduced (demotion).
- They are threatened or otherwise harassed.
- They are given a negative performance evaluation only as a result of reporting a concern in good faith.

No matter what form it takes, however, retaliation creates a hostile, threatening, and uncomfortable environment; negatively affects employment conditions for everyone; and is not consistent with NN's core value of demonstrating ethical behaviors in every aspect of our business.

Not all adverse actions are necessarily examples of retaliation. For example, it is not necessarily retaliation if an employee receives a negative performance review. If a negative review is the result of poor performance by the employee and unrelated to speaking up, this would not be an example of retaliation.

NN prohibits and does not tolerate any form of retaliation. Neither the Company or the NN Management Team will retaliate or in any manner discriminate against any employee based upon any lawful action of such employee with respect to:

- Good faith reporting of possible violations of applicable law, the Code of Conduct, or any Company policy or procedure.
- Good faith participation in any investigation, audit, or other action related to such a report.
- Objecting to conduct that reasonably appears to be a potential compliance violation.

The Company prohibits retaliation against employees even if their concerns are ultimately found to be unsubstantiated after investigation, unless the employee knowingly made a false allegation, provided false or misleading information in the course of an investigation, or otherwise acted in bad faith.

## **IV. Our Responsibilities**

The Company takes very seriously all reports received—but especially reports of potential violations of this policy. All reports will be investigated thoroughly in a professional manner and treated as confidential to the extent possible.

### **The NN Compliance Team is responsible for:**

- Thoroughly investigating potential violations of this policy.
- 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.

### **All managers and supervisors are responsible for:**

- Maintaining an open-door policy. Every manager or NN representative who receives a report of retaliation 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 reports of retaliation to the NN Compliance Team. Managers should never conduct investigations themselves.
- Leading by example and demonstrating a culture that values and addresses employee concerns and a commitment to preventing retaliation.
- Ensuring their staff members are informed about the Non-Retaliation Policy.
- 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 instance of suspected retaliation against yourself, any Company employee, or any other person for having spoken up in good faith to report a concern.

## V. Speaking Up

Employees who believe in good faith they or any other employee have been retaliated against, or have questions concerning this policy, should immediately speak up to the NN Compliance Team or by using the Whistleblower Hotline. Members of management who receive a report related to acts of potential retaliation must promptly report the details of the complaint to the NN Compliance Team or by using the Whistleblower Hotline.

**NN Compliance Team** – Email your concern to the NN Compliance Team at [NNCompliance@nninc.com](mailto:NNCompliance@nninc.com).

**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:



## VI. Additional Information

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