

Rea Corporate Governance

Code of Ethics (Updated 4/1/25)

Rea Magnet Wire Company, Inc., and its affiliates will conduct business with the highest ethical standards wherever we operate throughout the world. We will constantly improve the quality of our services, products, and operations, and will create a reputation for honesty, respect, responsibility, trust, and sound business judgment. Any unethical or illegal conduct on the part of Company officers, directors, employees, or affiliates is not in the Company's best interest. Rea will not compromise its long-term principles for short-term advantage. The ethical performance of the Company depends on the behavior of our people -- the men and women who work here. Thus, we are all expected to adhere to high standards of personal integrity.

Additionally, Rea is committed to maintain the highest standards of integrity, ethics, and sustainability in our business and supply chains. In keeping with our cornerstone values of Trust, Transparency and Teamwork, we are committed to working only with sub-contractors, vendors, service providers and business partners (collectively, "suppliers") who adhere to consistent standards and agree to conduct their business in accordance with these principles. Suppliers are therefore expected to hold their supply chain, including subcontractors and third-party labor agencies, to standards equivalent to those contained in this code. If a breach of this code occurs, Rea may, in its sole discretion, suspend related procurement, refuse or return goods from the supplier until appropriate corrective action is taken, and/or terminate its business relationship with the supplier in addition to any other rights or remedies available.

This Code of Ethics highlights the Company's standards for ethical business practices. More detailed guidance can be found in Company policies and procedures. Such policies include the Company's Employee Policy Manuals, Handbooks, or Collective Bargaining Agreements. Contact your local human resource representative for Company policies and procedures applicable to you.

OUR CORE VALUES AND MISSION STATEMENT

Responsibility comes with leadership. Every company has a distinctive culture and personality. Rea's is a reflection of our employees, our financial strength, our stability, and our desire to do the right thing. It's all about being a responsible corporate citizen; about leading by example in protecting the environment; and about providing stewardship for the communities in which we live and work. Fundamental to our success is our Mission:

Our mission is to lead our industry in the quality of our products, the safety of our employees, and in the value that we provide to our customers. A principal requirement is to consistently achieve financial results that will provide funds from operations to support reinvestment in facilities and growth that will increase the value of the Company. Innovation and cost-effectiveness are essential to all of our efforts. Rea must attract and develop capable people who accept the accountability for their own jobs, as well as the responsibility to improve our Company's performance. We all must work together to earn job security and to

create a productive, challenging and safe work environment. Rea will be socially responsible and will endeavor to improve quality of life in the communities in which we operate. It is vital to our future that Rea employees understand, are committed to, and work together to carry out this Mission.

OUR COMMITMENT TO OUR EMPLOYEES

Our employees are the source of our success. We treat one another with dignity and respect, promote teamwork, and encourage personal freedom and growth. Leadership and excellence in performance are sought and rewarded. The condition of our workplaces and the safety of our employees and others who work with the Company is a top priority. In honoring this commitment, we must:

- Recruit, hire, train, and promote high quality and committed employees.
- Provide conditions of employment without regard to a person's race, religion, gender, color, national origin, sexual orientation, age, disability, veteran status or other protected status and in accordance with applicable law.
- Protect our employees from discrimination and harassment within the workplace.

- Promote a drug-free, alcohol-free workplace, and expect employees to perform their duties to the Company free from the influence of illegal drugs and alcohol.
- Maintain a workplace environment with attention to exemplary practices for good housekeeping that promote and protect the health and safety of our employees.
- Treat others with fairness and respect in all of our dealings.

Rea is also committed to conducting business in a manner that respects and protects fundamental human rights as set out in the United Nations Universal Declaration of Human Rights. These include the right to life, liberty and security; equal rights of men and women; the right to protection under the law and against discrimination, slavery, servitude, torture or inhumane treatment; and freedom of speech, thought and religion. We take a zero-tolerance approach to modern slavery in all forms (including debt bondage, servitude, human trafficking and/or forced or child labor) occurring anywhere within our supply chain. In keeping with these commitments, our suppliers must uphold the following labor practices.

Forced Labor, Human Trafficking and Child Labor. Suppliers must not use forced labor, including but not limited to any form of involuntary prison labor, human trafficking, forced, bonded, indentured, or slave labor. The use of child labor in working for Rea is also prohibited. All suppliers must be able to certify that materials in their products have not been manufactured using or otherwise obtained from companies that use forced or child labor or participate in human trafficking. Rea expects its suppliers to take steps to ensure modern slavery and labor exploitation are not taking place in their business or supply chain.

Hiring and Employment Practices. Suppliers are expected to support and promote diversity in the workplace and provide equal opportunity for all qualified applicants. Suppliers must prohibit employment discrimination based on protected categories, including gender, age, ethnicity, nationality, religion, disability or marital status. Suppliers must also comply with all local laws and regulations regarding a worker's legal right to work, including verifying work status through appropriate documentation.

Respect and No Harassment. Suppliers must ensure that the personal dignity, privacy, and rights of each individual in their workforce are respected. Suppliers must strive to create a workplace that prohibits any form of unethical treatment, threats of

violence, or other forms of physical, mental or sexual harassment.

Compensation and Working Hours. Suppliers are required to conduct their operations in ways that promote a humane and productive work environment. Suppliers must compensate employees fairly and follow all applicable local wage, leave and hour labor laws and regulations. Where applicable, Suppliers must adhere to agreed-upon collective bargaining agreements. Suppliers shall ensure that working hours, including overtime, do not exceed applicable legal requirements and that workers are allowed appropriate leave time.

OUR COMMITMENT TO HEALTH, SAFETY, AND ENVIRONMENT

At Rea, we place the highest priority on providing a safe workplace for our employees and to operating in an environmentally sustainable and responsible manner. No consideration, deadline or job is more important than maintaining compliance with all applicable health, safety and environmental laws and standards. Our suppliers are expected to share our commitment to these core priorities.

Health and Safety. Suppliers must provide a safe and healthy work environment for all employees and anyone else present at their locations. Suppliers should take proactive measures that support accident prevention and minimize health risk exposure. This includes implementation of appropriate systems and procedures in order to prevent, manage, track and report occupational health and safety incidents. Suppliers should also ensure that all workers are sufficiently aware of health and safety risks and are appropriately trained in a language the worker can understand in relation to workplace hazards that they may be exposed to.

Environment & Sustainability. Suppliers are expected to conduct their business in an environmentally responsible way that supports sustainable operations, minimizes their impact on natural resources and protects the environment. Suppliers must ensure that their operations comply with all applicable environmental laws and that all related permits, approvals, and registrations are current and maintained wherever in the world they are operating.

Restricted Materials/Substances List. Suppliers must maintain sufficient knowledge of input materials and components to ensure they are obtained from permissible sources, in compliance with laws and regulations. If mandated by applicable law, suppliers are expected to

improvement appropriate policies and procedures regarding conflict minerals and exercise due diligence with the sourcing of these minerals. Suppliers may be required to show evidence of compliance with these requirements.

OUR COMMITMENT TO THE MARKETPLACE

Customers are the reason we exist; therefore, we must strive to help our customers succeed. We are committed to competing ethically and lawfully in the marketplace. We are honest and fair in all of our business dealings with customers, suppliers, vendors, and governmental agencies. In honoring this commitment, we must:

- Market and sell our products truthfully.
- Acquire products and services to produce our products legally and with integrity.
- Compete fairly in compliance with all applicable antitrust and competition laws.
- Gather business and competitor intelligence by legitimate means and only act on knowledge which has been gathered in such a manner.

Compliance with Laws. Suppliers must adhere to all applicable laws and regulations in the countries and jurisdictions in which they operate. In particular, suppliers must never seek to gain an advantage of any kind by acting fraudulently or dishonestly, making false claims or facilitating tax evasion or by allowing anybody else to do so on their behalf. Suppliers must comply with all anti-trust and other anti-competition laws.

Suppliers must comply with all applicable international trade and export control laws and regulations. In keeping with this commitment, while working with Rea, suppliers must not engage in any transactions or other business dealings, whether directly or indirectly, involving businesses or individuals located in countries that are subject of comprehensive sanctions or embargoes imposed by the U.S. government, including Cuba, Iran, North Korea, Syria and the Crimea, Luhansk and Donetsk Regions of the Ukraine. Because trade and export restrictions are dynamic and subject to change, suppliers are expected to maintain up to date compliance with the restrictions published by the relevant authorities in each country where they operate, including the U.S. Office of Foreign Asset Control and U.S. Bureau of Industry and Security. Suppliers must also maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices.

Supply Chain Management. Suppliers must procure goods and services in a responsible

manner and in compliance with this code. In particular, suppliers are expected to communicate our requirements throughout their supply chains by adopting processes, policies, procedures and training to ensure compliance with all applicable laws and promote the standards and expectations set forth in this code. This includes the following aspects:

Supply Chain Transparency and Right of Access.

In order to ensure and demonstrate compliance with this code, transparency is paramount. Suppliers shall keep records of all relevant documentation in relation to work undertaken for Rea which may be reviewed to verify compliance with this code upon reasonable request.

Training and Competency.

Suppliers are expected to communicate and enforce the principles of this code to their supervisors, employees, and suppliers. This includes establishing appropriate training measures to allow managers and employees to gain an appropriate level of knowledge and understanding of this code, the applicable laws and regulations and generally recognized standards.

OUR COMMITMENT TO PROTECT COMPANY ASSETS

We operate in the best interests of the Company and our shareholders, and we exercise care in the use of our assets and resources. Essential to our success is the building of world-class assets at all our locations. Our products and services reflect dedication to quality, innovation, and value to meet our customers' needs. In honoring this commitment, we must:

- Safeguard the Company's confidential, proprietary, and personal information (such as business plans, financial and operating results, marketing strategies, customer lists, personnel records) against inappropriate or unauthorized disclosures.
- Protect the Company's intellectual property (such as patents, trademarks, trade secrets, and copyrights), and respect the intellectual property rights of competitors, suppliers, and others.
- Protect all Company assets, including our computers and networks, against misuse or theft.

OUR COMMITMENT TO COMPLIANCE WITH LAWS, RULES, AND REGULATIONS

We are committed to complying with all laws, rules, and regulations that apply to our business. In honoring this commitment, we must:

- Follow all applicable laws, rules, and regulations governing our activities.
- Refrain from direct or indirect payments to government officials that could be considered bribes in violation of applicable laws.
- Never trade on or improperly disclose "inside" information, which is nonpublic information.
- Refrain from personal political activities on Company time or the use of Company resources in connection with such activities, unless such activities are specifically protected by applicable laws.

OUR COMMITMENT TO RESPONSIBLE REPORTING

We are committed to delivering accurate and reliable information as approved by Corporate Management to shareholders, customers, suppliers, management, employees, the media, financial institutions, and other members of the public. In honoring this commitment, we must:

- Keep accurate and complete books and records, including expense reports or time records.
- Comply with Company policies, procedures and systems of internal control, and immediately report any concerns about the accuracy and completeness of financial or business records.
- Forward all media and other external organization requests for information regarding the Company to Corporate Human Resources.

OUR COMMITMENT TO INTEGRITY

Our success depends on doing the right thing which builds our good reputation. We must strive to preserve this reputation and enhance it by always acting in an ethical manner. In honoring this commitment, we must:

- Avoid conflicts of interest. Conflicts of interest can occur when we take actions that make it difficult to perform our duties objectively and effectively. Examples of these conflicts may include, but are not limited to:
 - Taking advantage of Company opportunities we learn about as a result of our position with the Company.
 - Having a financial interest in a competitor, customer, or supplier.

- Advancing any private business or personal interests at the expense of the Company, its customers, or affiliates.
 - Representing the Company beyond one's level of responsibility.
 - Recognizing that the activities and financial interests of our spouse, significant other, children, parents, or in-laws may give rise to the appearance or potential conflict of interest.
- Not accept or offer gifts, including meals and entertainment, except as permitted by Company policies as are in effect from time to time.

Conflict of Interest. Suppliers must avoid all ethical, legal, financial or other personal relationships, activities and interests that could present a potential or actual conflict of interest. If a supplier has a relationship with any Rea employee that could represent a conflict of interest, this must be promptly disclosed to Rea.

Bribery & Corruption. Suppliers must refrain from involvement in any and all forms of corruption, extortion, embezzlement, bribery and kickbacks. It is strictly prohibited to offer, give or accept improper payments or anything else of value in order to obtain or retain business or to secure a business advantage, whether directly or indirectly via a third-party agent or intermediary. Suppliers must ensure that gifts or other business courtesies given to customers (including Rea employees), government officials and any other party are appropriate in nature and in compliance with all applicable anti-corruption laws.

YOUR COMMITMENT TO THE COMPANY

As an employee of the Company, it is expected that your personal life will not interfere with your ability to deliver quality products and/or services to the Company and its customers. You agree to disclose unethical, dishonest, fraudulent, and/or illegal behavior or the violation of Company policies and procedures by other employees.

Ideally, you should raise concerns or questions before serious problems arise. You should talk with your supervisor or management representative or anyone listed below if you believe that you or your co-workers risk violating laws, regulations, or Company policies, or if you find yourself uncomfortable with a situation. When in doubt, raise your concerns. The Company will listen.

Most issues regarding the Code of Ethics and how it applies to a particular situation can be resolved locally before they become problems for the

Company, employees, or the public. The Company encourages employees to present ideas, raise concerns, or ask questions about this Code of Ethics – especially those of an ethical or legal nature. All managers are responsible for supporting and enforcing this policy by maintaining an “open door” for their direct reports and those who may reach out to them. While we hope that employees feel comfortable discussing any matter with their supervisors, there may be times when a supervisor cannot help. There are a variety of resources available to help you.

WHISTLEBLOWER POLICY

The Company encourages an environment where individuals can confidentially and anonymously report serious complaints and concerns regarding questionable business practices without fear of reprisal. This requires a program by which the appropriate body can receive, retain and investigate all reports of complaints and concerns regarding unethical behavior.

Reportable conduct includes but not limited to:

- Suspect, questionable, unethical, unlawful, and/or intentional breach of or failure to implement accounting and auditing policy, practices or procedures
- Inadequate internal accounting controls
- Misleading or coercion of auditors
- Disclosure of fraudulent or misleading financial information,
- And instances of corporate fraud, theft, or misappropriation of Company assets.

Any person who makes a disclosure or raises a concern under this policy will be protected if the person discloses the information in good faith; believes it to be substantially true; does not act maliciously or make false allegations; and does not seek any personal or financial gain.

Employees are encouraged to provide as much specific information as possible including names, dates, places, and events that took place and the employee’s perception of why the incident(s) may be improper. Concerns can be anonymously reported via telephone, email or U.S. mail to any one of the following individuals.

The Company will investigate all concerns raised by employees and take appropriate action based on the alleged wrongdoer; the seriousness of the allegation; the creditability of the allegation; and the urgency of an investigation and resolution. The Company will maintain confidentiality to the extent possible during the investigative process.

The sensitive nature of the Company's reputation demands that the Company view very seriously any report that proves to be unsubstantiated or which proves to have been submitted knowing it to be false, or with malicious intent, or in bad faith. The Company regards the making of such reports as a serious disciplinary offense which may result in disciplinary action up to and including dismissal for cause.

Reporting a concern: In addition to contacting your direct supervisor or manager, you may also contact any one of the following:

- Chris Billingsley, President and Chief Executive Officer of Rea Magnet Wire
- Susan Boyd, Vice President of Human Resources (260-421-7343)
- Ben Fowls, Vice President of Finance (260-421-7306)
- Via mail: Compliance Officer, Rea Magnet Wire Company, 3400 E. Coliseum Blvd., Suite 200, Fort Wayne, Indiana 46805

Reviewed and approved by Rea Leadership Team as of April 1, 2025.