



Code of Business Conduct and Ethics

Revision Date:

January 16th, 2025

CODE OF BUSINESS CONDUCT AND ETHICS

As officers, directors, employees, and contractors of Bearing Technologies, Ltd., its subsidiaries, and its affiliated companies (“Bearing Tech” or the “Company”), we are responsible for conducting the business affairs of the Company in accordance with all applicable laws and in a moral and honest manner. To make certain that we understand what is expected of us, Bearing Tech has adopted this Code of Conduct and Ethics.

The Code contains commonsense rules of conduct with which the great majority of Bearing Tech officers, directors, employees, and contractors routinely conform. However, we ask that you read them carefully and completely and that, as you do, you reflect on your past actions to make certain that you have complied with the policies. It is absolutely essential that you fully comply with these policies in the future. If you have any questions, talk them over with your supervisor, manager, Bearing Tech Representative, or Bearing Tech legal counsel.

At Bearing Tech, we have a strong commitment to conducting business not only in accordance with law but also in an ethical and honest manner. Upholding these values and complying with our Code is required of all directors, officers, employees and independent contractors working for Bearing Tech.

OUR VALUES

At Bearing Tech our core values are:

- Respect
- Integrity
- Sustainability
- Communication
- Excellence

RESPECT

We treat others as we would like to be treated ourselves. We do not tolerate abusive or disrespectful treatment.

Underage Labor - We do not employ underage labor and will not knowingly do business with vendors that employ underage labor. Individuals with hiring authority are diligent and check red flags for misrepresented ages. Bearing Tech employs safety practices that ensure any non-adult laborers are engaged only in non-hazardous work in compliance with law. We do not ask individuals to engage in illegitimate workplace practices, apprenticeships and internships that do not provide appropriate safety requirements or benefits to the employee, intern, or student apprentice.

Forced Labor and Human Trafficking – Bearing Tech condemns forced labor and human trafficking. We do not engage prison labor and employ diligence when contracting for labor to look for any indicators of forced labor. All employees have the right to engage in work willingly, without surrendering identification and without the payment of fees. Employees must be free to resign from their employment without violence

or retaliation.

Suppliers must comply with the Supplier Code of Conduct which includes prohibitions on child and forced labor. In addition, Bearing Tech's human rights supply chain diligence includes the following elements: below.

1. Risk Assessment/Verification

We conduct a risk assessment audit as part of our due diligence when choosing suppliers. Many factors are considered as part of the process, including risks of human trafficking and slavery. All new direct material suppliers are subject to a stringent on-boarding process that is compliant with International Automotive Task Force (IATF) standards. This includes on-site visits ensuring systems and processes are in place covering areas such as quality, capacity, risk management and corporate social responsibility topics.

2. Auditing

As part of our quality audits conducted on-site at suppliers' facilities, auditors watch for red flags that could indicate a concern with regards to forced labor or human trafficking.

3. Certification

The Company's Supplier Code of Conduct is widely distributed to its supply base around the world and addresses issues of particular importance in our global supply chain, including the subject of labor abuse and human trafficking. The Code requires that suppliers not use any involuntary or forced labor and comply with all child labor laws. The Supplier Code of Conduct is referenced in our standard terms and conditions. We expect our suppliers around the world to adhere to this Code. In the event of a failure of a supplier to adhere to the Code, we will impose requirements for prompt implementation of a corrective action plan, or other additional consequences, up to and including the termination of the relationship with the Company.

4. Internal Accountability

The Company requires all salaried employees, including those involved in the supply chain, to review and sign the Company's Standards of Business Ethics. The Standards of Business Ethics outlines the workplace standards and business practices that are consistent with our core values of ethics and integrity and addresses, among other things, compliance with laws regarding human trafficking and forced and child labor. The Standards make clear that any violations of the Company policy can result in disciplinary action, up to and including discharge. Employees are encouraged to report any concerns regarding business ethics, including human rights concerns, to the Company through our Human Resources Department.

5. Training

The Company provides periodic training to its employees responsible for procurement on a number of topics, including forced labor.

Conflict Minerals – Our procurement teams work to: (a) identify whether any goods we purchase contain tantalum, tin, tungsten or gold; (b) conduct a reasonable country of origin inquiry regarding the origin of such minerals in such goods to determine whether such minerals originated in the Democratic Republic of Congo or other covered countries, as defined in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act; (c) if such minerals originated in covered countries, conduct due diligence on the chain of custody of the source of such minerals for the purpose of identifying the smelter of said materials; and (d) conduct reasonable due diligence concerning the smelters of such minerals.

Freedom to Associate – We do not retaliate against or intimidate employees who engage in workplace organizing activities. We respect the freedom of our employees to associate.

Hours and Wages – We comply with all applicable laws regarding regular and overtime hours, and all overtime work is voluntary. Wages and benefits are not unfairly withheld.

Non-Discrimination – [We value our diverse team.] We do not discriminate on the basis of gender, race, religion, age, disability, sexual orientation, pregnancy, marital status, nationality, political opinion, trade union affiliation, social or ethnic origin, or other statuses protected by local law.

Health and Safety – We aim to provide safe workplaces and take steps to mitigate accidents and control health and hygiene hazards.

INTEGRITY

We work with customers and prospects openly, honestly, and sincerely. When we say we will do something, we will do it; when we say we cannot or will not do something, then we won't do it.

Accurate and Transparent Records – All of our team is responsible for keeping accurate and transparent books and records. We all retain, dispose or destroy business records in compliance with applicable laws and requirements and our internal record retention policies.

Conflicts of Interest – When carrying out our roles for Bearing Tech we act in the best interest of the Company and not our own personal needs. To ensure transparency, we disclose any possible conflicts of interest, such as a relationship with a vendor or a family member's employment at a business partner to [our managers or the ethics department].

Anti-corruption – Bearing Tech is committed to obtaining business the right way. We do not accept, solicit, offer or pay any improper payments in order to obtain a business advantage or special treatment. You must report any potential instances of Bearing Tech representatives soliciting bribes or kick-backs to Bearing Tech management or through Bearing Tech's anonymous reporting channel.

Gifts & Hospitality – We avoid activities that may create appearance of impropriety, such as, for example, offering, providing or reimbursing personal gifts, favors, personal travel expenses, excessive meals or entertainment, or any other thing of value to a Bearing Tech customer, a government official, or any other person with the intent to influence business decisions. In addition, we do not provide excessive gifts and hospitality to third parties, including government officials.

Confidential Information – Bearing Tech's confidential or proprietary information may only be disclosed to persons and entities (i) with a need to know such information for the performance of services authorized in writing by Bearing Tech and (ii) who are bound to maintain it in strict confidence. You must ensure that third party agreements include appropriate clauses to ensure the protection of such information prior to disclosing it. Confidential information includes, but is not limited to, all non-public Bearing Tech data, including: business plans, pricing strategies, marketing plans, management changes, Bearing Tech's or customers' personal information and intellectual property.

Global Trade Compliance – Bearing Tech complies with all applicable laws, regulations, and standards that regulate global trade, sanctions, export controls, customs entry/export, country of origin, importation, licensing, and sale of imported merchandise.

SUSTAINABILITY

We foster a work environment that focuses on safety, quality, and environmental responsibility. We seek to better our communities through volunteerism and community leadership. We practice responsible sourcing in our supply chain activities.

COMMUNICATION

At Bearing Tech, we take the time to talk with one another and to listen. We believe that information is meant to move and that information moves people. We expect our suppliers to incorporate key communication principles.

Training – We maintain a robust training program that ensures that employees know applicable requirements.

How to report code concerns – We have various ways that you may choose to report a suspected code violation, ask questions, or raise concerns:

- By phone: 440-937-2604
- By mail: Bearing Technologies, Attn: Director of Human Resources, 1141 Jaycox Road, Avon, Ohio 44011
- By email: code@brgttec.com

You may report anonymously. You are not required to identify yourself when you make a report. If you choose to provide your name, it will be kept confidential to the extent allowed by local law.

Whistleblower Protections – Bearing Tech does not tolerate retaliation against those who speak up in good faith. Speaking up in good faith means that you report your concerns honestly and completely.

Reporting – You are required to notify Bearing Tech promptly of any suspected violations of this Code. Those who failure to report a violation may be subject to discipline, including termination of employment.

EXCELLENCE

We strive for the very best in everything we do. We will continue to raise the bar for everyone. The great fun here will be for all of us to discover just how good we can really be. Bearing Tech stands on the foundation of its vision and values. Every employee is educated about the Company's vision and values and is expected to conduct business with other employees, partners, contractors, suppliers, vendors, and customers keeping in mind respect, integrity, communication, and excellence.

Everything we do evolves from Bearing Tech's vision and values statements

At Bearing Tech, we treat others as we expect to be treated ourselves. We believe in respect for the rights of all individuals and are committed to promoting an environment characterized by dignity and mutual respect for employees, customers, contractors, suppliers, partners, community members, and representatives of all levels of government.

Relations with the Company's many publics – customers, stockholders, governments, employees, suppliers, press and bankers – will be conducted in honesty, candor, and fairness. Laws and regulations affecting the Company will be obeyed. Even though laws and business practices of foreign nations may differ from those in effect in the United States, the applicability of both foreign and US laws to the company's operations will be strictly observed. Illegal behavior on the part of the employee in the performance of Company duties will neither be condoned nor tolerated.