



Code of Business Ethics

Helping **power, protect, connect** our world®

Results, but results the right way

Eredmények, de a megfelelő módon

Resultaten, maar op juiste wijze verkregen

有结果，但以正确的方式获得

Ergebnisse, aber in der korrekten Art und Weise

성과, 바른 방법을 통하여

結果はあるが、正しい方法で結果を出す



ROGERS
CORPORATION



Helping **power, protect, connect** our world®

As Rogers' Interim President and Chief Executive Officer, I am proud to reaffirm our unwavering commitment to the highest standards of ethical conduct and integrity in all aspects of our business operations. The foundation of our success is the trust and confidence placed in us by our employees, customers, partners, investors, and the communities in which we operate. Our Code of Business Ethics is not merely a document but the embodiment of our **Cultural Behaviors** and principles that guide our daily decisions and actions.

This Code is designed to ensure that we conduct business legally, ethically, and in a manner that reflects our dedication to corporate responsibility. It outlines the behaviors expected of every member of our organization and serves as a roadmap for making decisions that align with our company's moral compass. As we say in the Code, we strive to achieve Results, but Results the Right Way.


I am committed to demonstrating the importance of ethical behavior and holding myself to the same high standards that I expect from all Rogers employees. Senior leadership is dedicated to fostering an environment where ethical considerations are at the forefront of our business strategy, and where transparency, accountability, and fairness are not just expected but required.

I urge every one of you to integrate our Code of Business Ethics and its principles into your work. We must all be vigilant in recognizing and addressing ethical issues, no matter how small they may seem. If you encounter situations that challenge your ethical judgment or witness conduct that contradicts our Code, I encourage you to speak up. We have established clear channels for reporting concerns, and I assure you that we will address each issue with the seriousness it deserves, ensuring that individuals who come forward will be protected from any form of retaliation.

Our collective adherence to the Code will ensure that Rogers continues to thrive as a responsible corporate citizen. It will enable us to build stronger relationships with our stakeholders, achieve sustainable growth, and maintain a reputation that we can all be proud of.

Thank you for your dedication to upholding our values and for contributing to our company's ethical culture. Your commitment shapes our culture of integrity and continues Rogers' long history as a respectable company.

Best Regards,

A stylized, handwritten signature in black ink, appearing to read 'Ali El-Haj'.

Ali El-Haj

Interim President & CEO, Rogers Corporation



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Our Fundamental Principles

The following fundamental principles and our **Cultural Behaviors** provide the foundation for understanding and applying the standards of conduct found in this Code. Real world circumstances will not always permit a neat fit for the application of these standards. Therefore, it is critical that you actively seek support and guidance from your supervisor, Human Resources representative, the Director of Global Compliance & Integrity or the Legal & Compliance Department.

■ Why is this Code of Business Ethics so important?

A strong reputation is essential for our business success and for building lasting relationships. It fosters goodwill, which is vital during challenging times.

Our reputation is built on the trust of employees, customers, stakeholders, and the communities we serve. This trust is one of our most valuable assets.

As a global company, our actions impact a wide range of people—customers, suppliers, regulators, shareholders, employees, and communities. All interactions must adhere to legal requirements and our high ethical standards. Given the visibility of modern communication, our actions are instantly global and we must uphold the highest standards to maintain trust and respect in the business community.

■ Who is covered by the Code?

This Code and its supporting policies apply to all Rogers Corporation (“Rogers” or the “Company”) directors, officers, and employees. Consultants, representatives, agents, subcontractors, and suppliers are also expected to adhere to standards of conduct consistent with this Code in performing services for, and providing products to, the Company.

All Company directors, officers, and employees are required to be familiar with the Code, comply with its provisions, and report any actual or suspected violations.

■ What does the Code mean in practice and who is responsible for upholding it?

You must always act with honesty and integrity and refrain from behaving, or assisting others in behaving, dishonestly or fraudulently. Each director, officer, and employee also has a “duty of fair dealing” and must treat the Company’s customers, suppliers, competitors, and employees fairly and should not take unfair advantage of anyone by manipulation, misrepresentation, or abuse of information.

We are also responsible for contributing to an open and honest environment at Rogers that supports the ethical and effective management of risks to people, products, property, reputation, and information.

We must be aware of, and act in accordance with, this Code of Business Ethics, all supporting policies and the laws and regulations of the countries in which we work and do business.



Our Fundamental Principles

■ How is the Code of Business Ethics implemented?

The Code has been adopted by Rogers' Board of Directors and applies worldwide. "Rogers," "Rogers Corporation" or "Company" as used throughout this Code, includes Rogers' controlled entities globally. This Code applies to all directors, officers, employees, and representatives, including consultants and agents, as well as suppliers to the Company.

The Director of Global Compliance & Integrity is responsible for implementing this Code.

Waiver of all or part of this Code of Business Ethics, conflicts of interest, or various other policies issued to supplement the Code will be granted only in exceptional circumstances and only after approval by Rogers' Director of Global Compliance & Integrity and General Counsel. Any waivers for directors and executive officers must be approved by both by Rogers' Director of Global Compliance & Integrity and the Board of Directors or a Board committee and will be disclosed promptly as required by law, regulation, and or Rogers' policy.

All employees have an obligation to raise any questions or concerns they may have regarding this Code and report any good faith suspicions of its violation or violation of applicable law. Moreover, employees have an affirmative obligation to reasonably support the company in investigating any such suspected violations. Anyone who raises a concern in good faith about a possible breach of this Code, violation of policy, or any other compliance concern, will not be subject to retaliation. Any act or threat of retaliation is considered a serious violation of this Code.

Our managers and supervisors are responsible for providing appropriate support to enable their employees to understand the requirements of this Code and supporting policies and how they should be applied. You also must be prepared to exercise good judgment and common sense in deciding the right actions to take as this Code and our supporting policies cannot cover every situation that may arise. The standards of conduct contained in this section represent our minimum expectations for ethical business behavior. You should ask questions if you are unclear about any aspect of this Code, or if you are not sure how to respond to an issue that the Code does not address.

Any failure to comply with this Code or its supporting policies will be fully investigated and appropriate action will be taken such as retraining, reassignment, demotion, discipline, notification to government authorities, or other corrective action, including termination of employment, depending on the circumstances.



Asking Questions and Raising Concerns

■ How do you ask a question or raise a concern?

Rogers Corporation is committed to an open and honest environment.

Anyone who raises a concern in good faith about a possible breach of this Code, violation of policy, or any other compliance concern, will not be subject to retaliation. Any act or threat of retaliation is considered a serious violation of this Code.

You may at some time come across a situation that may appear to violate this Code, company policy, or applicable law. You also may have questions about this Code, a company policy, or a particular situation. You are encouraged to ask questions, seek clarification, or raise a concern through appropriate channels.

In general, you should first seek to address your question or concern with your supervisor. If you believe this is not appropriate under the circumstances, you may also contact Human Resources, the Director of Global Compliance & Integrity, the General Counsel, or the Legal & Compliance Department.

If you prefer to contact someone outside your area, or submit a report anonymously, you may also utilize our confidential Ethics Hotline:

Belgium	0800.13.338
China	4001209079
Germany	0800.181.2922
Hungary	06.80.020.304
Japan	0800.600.0083
Mexico	8008801716
Singapore	8004922775
South Korea	00744815
Taiwan	00801.49.1870
United Kingdom	0800 066 8925
United States	1.844.841.1348

OR via the web: <http://rogerscorp.ethicspoint.com>

For the most current contact information, as well as other helpful materials, please see the [Compliance & Integrity page of RogersNET](#).



Questions to Consider in Your Everyday Business Activities

■ Practice Tips

A good strategy to follow when trying to make the right decision is to ask yourself the following questions:



Am I following applicable law and Company policy?



Am I acting in the best interests of our Company, our employees, and our shareholders?



Is there someone at our Company that can help me with my decision?



Would I feel comfortable if my colleagues, family, friends, or the public knew of my decision?





Promoting Product Quality and Safety

Rogers Corporation is committed to providing quality products. We uphold our product quality and safety standards through continuous monitoring and improvement, accurate record keeping and reporting, candid identification of errors, and swift corrective action.

What is expected of you?

- Utilize good manufacturing practices designed to protect the quality and promote the safety of our products and our employees.
- Institute monitoring and surveillance to maintain compliance to all product specifications and quality and safety standards for the products we produce and sell.
- Report to your supervisor any product quality or safety concerns of which you become aware.
- Be aware of and comply with all quality control processes relating to your area of the business.
- Comply with all company policies and all relevant regulations regarding the handling of substances that have the potential for misuse and, where within the scope of your responsibilities, prevent the inappropriate use of these substances.
- Promptly notify a supervisor of any suspected violations of our quality or safety standards.



Conducting Research and Development

Rogers Corporation was built on a foundation of cutting-edge technology and innovation. Research and development is a cornerstone of the success of our Company. We will conform to the most stringent scientific and ethical standards in pursuing these activities. We will uphold our standards through accurate recordkeeping and reporting and scientifically valid protocols and analysis.

What is expected of you?

- Adhere to scientifically rigorous protocols in all research and development.
- Accurately report data and measurements made in the course of research and development activities.
- Be aware of and comply with all applicable laws and company policies covering your area of research and development.
- Do not misuse the intellectual property of the Company or of others.



Protecting Intellectual Property

Rogers' Intellectual Property (IP) contributes to our ability to effectively conduct our business and achieve our business objectives. We protect our IP through various means, including patents, confidentiality agreements, and by safeguarding it against improper disclosure. Our IP is intended to be used in our legitimate business activities and may not be used or disclosed for any other purpose without proper authorization. We also respect the IP rights of others and will not knowingly violate the valid IP rights of third parties.

What is expected of you?

- Actively participate in company IP development activities relevant to your role, including disclosure of inventions and potentially patentable ideas.
- Take all steps necessary to protect company IP by implementing all safeguards required by Company policy.
- Make sure all IP, including emails, is marked per the Company's data classification guidelines.
- Do not disclose confidential information, including information about Rogers' development capabilities, equipment, and laboratories, unless you have been authorized to do so per company policy or required by applicable law and only on a need-to-know basis.
- Notify your supervisor if you have any questions or concerns regarding the development, use, or protection of the Company's IP.
- Notify a supervisor if you see any person misusing or not protecting any Company IP.
- Do not disclose confidential information from or about a former employer. If you leave Rogers, do not take any Rogers confidential or proprietary information with you and do not disclose this information outside of Rogers or to a subsequent employer.
- If any third party attempts to gain improper access to Rogers' IP, promptly notify the Legal & Compliance Department.
- Exercise due diligence to understand the IP rights of third parties and avoid infringing on the valid IP rights of others.
- Know that anything you create within the scope of your employment with Rogers may be considered Company IP.



Marketing Our Products

Rogers Corporation uses only ethical marketing practices that meet or exceed the requirements of the laws of each country where we conduct business. We promote our products fairly and our promotional materials are accurate and complete. We provide only truthful information about Rogers' products as this best serves the needs of our customers, the public, and our business.

What is expected of you?

- Develop, approve and distribute marketing material in accordance with industry best practices.
- Use only promotional or educational materials that have been approved for use in accordance with the Company's standard review procedures.
- Never create or use promotional materials without first obtaining company authorization for distribution.



Speaking and Acting on Behalf of the Company

Rogers Corporation is committed to making sure communications about the Company, and actions made on its behalf, are accurate and made by employees who are authorized to speak, and act, on the Company's behalf. Be careful to recognize situations where you may be perceived as representing or speaking on behalf of Rogers.

Know the limits on your authority to speak, sign, or otherwise act on behalf of the Company. Do not take any action that exceeds those limits. Remember to obtain authorization before speaking in any public forum or publication and follow the Rogers External Communications and Social Media Policy.

Rogers respects your right to engage in social, professional, and political dialogue outside of work. Use good judgment when making personal statements in public, including on your personal social media accounts. Also use care in internal communications and be responsible with your comments on our internal communications channels. Nothing in this Code should be interpreted to prevent employees from engaging in activities that are protected under laws and regulations that allow employees to discuss or disclose their personal compensation information.



Promoting Equal Opportunity and Appropriate Workplace Behavior

Rogers is committed to fostering and preserving a culture of equal opportunity, diversity, and inclusion. The collective sum of the life experiences, individual differences, unique capabilities, and talent that our employees bring to their work represents a significant part of not only our culture, but also our reputation and Company achievement.

The success and advancement of employees at Rogers is based on personal ability, behavior, and work performance. The judgments and actions of the Company towards its employees, candidates for employment, and third-party business associates are governed by the ability and potential of an individual in relation to the needs of the job.

Employees of Rogers must conduct themselves with courtesy, consideration, and respect towards each other and towards people who deal with the Company. We do not tolerate harassment, bullying, or violence in workplace conduct. We prohibit retaliatory treatment against anyone that makes or assists in making a good faith claim of improper workplace conduct.

■ What is equal opportunity and workplace conduct?

Equal opportunity refers to our policy of providing a workplace free of discrimination and making decisions about hiring, advancement, compensation, and career development based on qualifications, skills, and performance, and not on any unlawful considerations. Workplace conduct concerns how employees communicate, behave, interact, and treat each other. Improper workplace conduct may involve any communication or display of inappropriate material, offensive behavior, and verbal, physical, and all other forms of harassment. For more information, please see Rogers' [Equal Employment Opportunity Policy](#).

What is expected of you?

- Base decisions and actions regarding an individual employee only on that employee's qualifications, skills, and performance in relation to the needs of the job.
- Behave towards others with integrity, honesty, courtesy, consideration, respect, and dignity.
- Never make written, verbal, or physical advances, requests, or statements of a sexually harassing nature.
- Never behave in a way that is offensive, insulting, discriminatory, or degrading to others.
- Promptly report to a supervisor inappropriate conduct directed toward you or others.
- Foster teamwork and employee participation, encouraging the representation of different employee perspectives.



Respecting Human Rights

Our Company respects human rights wherever we operate and believes that all people should be treated with dignity and respect. As part of our commitment to our employees, communities, and our world, Rogers Corporation will not tolerate any instances of human trafficking or other forced labor. We also will never knowingly conduct business with any third parties who engage in human trafficking, child or forced labor, or human rights abuses.

We will comply with all applicable local governmental laws, regulations, and international standards with respect to the health and safety of our workers.

Employment is on a voluntary basis and workers are free to leave work or terminate their employment with reasonable advance notice as required by applicable law. We shall not require monetary deposits or retain identity papers or work permits as a condition of employment.

Workers will not be subjected to corporal punishment, mental, physical or sexual coercion, verbal abuse, or the use of gesture, language, or graphic materials that are threatening, abusive, or exploitive.

What is expected of you?

- Never commit the Company to do business with any customer or supplier that we know tolerates the use of child labor or forced and/or bonded labor.
- Ensure that customers and suppliers comply with these principles.
- Help to develop and maintain systems and procedures designed to keep workers safe and protect them from occupational hazards, harassment, and abuse.



Preventing Bribery and Corruption

Rogers Corporation, its employees, and others who act on its behalf must not offer, pay, or accept bribes. We must not offer or give money or anything else of value if this would constitute either an improper inducement to make, or a reward for making, any decision favorable to the interests of Rogers. This includes providing improper benefits of any kind to government officials, suppliers, or customers. It also includes providing benefits to charities, companies, or individuals if these benefits would provide an improper advantage, inducement, or reward.

We do not permit any third party working on our behalf to engage in this type of conduct.

We comply with all applicable international laws, treaties, and regulations that forbid bribery, including the local laws where we conduct business, such as U.K. Bribery Act and the U.S. Foreign Corrupt Practices Act (“FCPA”).

■ What is bribery?

Offering or making payments to secure or retain business, or to obtain an improper advantage, is a crime in many of the countries in which we do business, whether such payments are in cash or in kind.

What is expected of you?

- Never make, authorize, or accept bribes to obtain, retain, or influence business or to secure any other improper advantage, or permit third parties, such as distributors, contractors, sales representatives, or agents, to do so.
- Promptly report to a supervisor, the Director of Global Compliance & Integrity, or a member of the Legal & Compliance Department any behavior of this type, including that of Rogers’ employees, contractors, advisors, or other third parties.
- Do not make a gift or engage in conduct that would embarrass the Company if publicly disclosed.
- Do not provide any form of “facilitation payment” to any public official without the express written authorization of the company’s General Counsel. A facilitation payment, also known as a “grease payment”, is a payment made to a government official with the intention of expediting an administrative process.
- Consult the Legal & Compliance Department if in doubt.



Recognizing and Avoiding Conflicts of Interest

Rogers Corporation employees must perform their job responsibilities loyally and objectively, without allowing personal, family, or their own financial interests to influence their judgment. Employees must avoid not only actual conflicts of interest, but also the appearance of a conflict of interest. While the Company recognizes that its employees are free to make personal financial investments and to maintain social and business relationships, these relationships must not create any interests that conflict with those of the Company. Any waivers of this requirement must be preapproved by the company's General Counsel or Director of Global Compliance & Integrity.

■ What is a conflict of interest?

A conflict of interest occurs when an individual's private interest (or the interest of a member of their family) interferes, or appears to interfere, with the interests of the Company as a whole.

What is expected of you?

- Understand that your loyalty as an employee is to the legitimate business interests of Rogers and act accordingly.
- Take appropriate precautions to avoid the appearance of impropriety, even if you believe your actions are appropriate.
- Do not seek or accept outside employment with competitors or those who do business with Rogers, such as suppliers.
- Avoid doing business with family members or those with whom you have close personal relationships.
- Refrain from accepting consulting arrangements or serving on boards or other advisory bodies for organizations, including industry trade associations, when related to your work for Rogers.
- Do not obtain ownership in property or other interests which Rogers may seek to acquire, with whom the Company may conduct business, or which may compete with the Company.
- If you have a question about a potential conflict of interest, or become aware of an actual or potential conflict you must discuss the matter with, and seek a determination and prior authorization or approval from, the General Counsel or the Director of Global Compliance & Integrity.
- Directors and executive officers must seek determinations and prior authorizations or approvals of potential conflicts exclusively from the Nominating, Governance and Sustainability Committee of the Board of Directors by notifying the General Counsel pursuant to the Company's **Related Party Transactions Policy**.



Corporate Opportunities and Duty of Loyalty

Rogers Corporation directors, officers, and employees owe a duty to the Company to advance the legitimate interests of the Company when the opportunity to do so arises. Directors, officers, and employees are prohibited from directly or indirectly (a) taking personally for themselves opportunities that are discovered through their work for or with the Company; (b) using Company property, information, or positions for personal gain; and (c) competing with the Company.

What is expected of you?

- Be completely loyal to the Company at all times.
- Avoid conflicts of interest, prevent self-dealing, or taking advantage of corporate opportunities for personal gain.
- Place the interests of the Company and shareholders before your personal interests.
- Do not divert corporate assets, opportunities, or information for personal gain



Gift Giving and Receiving

Developing good working relationships with our customers, suppliers, and business partners is important to our growth. Reasonable gifts and entertainment are courtesies that are sometimes exchanged to foster these relationships and build goodwill. However, providing gifts and entertainment can also create the perception that business decisions were made based on factors other than fair and objective business criteria. It is for this reason that we must exercise caution and be thoughtful when giving or receiving business gifts and entertainment.

We have a responsibility to make sure that any gift, entertainment, or other benefit we give or receive is appropriate and consistent with Company policies. Avoid all gifts, entertainment, or benefits that might compromise or appear to compromise, the objectivity of all involved parties. Gifts, entertainment, or other benefits should never influence, or give the appearance of influencing, impartial decision-making.

What is expected of you?

- Review and adhere to the Rogers Gifts & Entertainment Policy.
- Do not solicit or accept any gift, entertainment, or other benefit from anyone in exchange for doing business with our Company.
- Never, under any circumstances, offer or accept any cash gifts, cash gift equivalents (such as gift cards), or loans.
- Seek the guidance of the Director of Global Compliance & Integrity or the Legal & Compliance Department if you are unsure whether you should offer or accept a business gift, entertainment, or other benefit.

■ Practice Tips

As a general rule, do not give or receive gifts, entertainment, or other benefits unless the gift meets all of the following criteria, as further elaborated in the Gifts & Entertainment Policy:

- Infrequent and reasonable in value
- In the ordinary course of business
- Consistent with customary practices in your industry and country
- Permitted by the other party's company policies
- Compliant with all applicable laws and regulations
- NOT solicited
- NOT in cash or cash equivalents, such as gift certificates or gift cards
- NOT tied to a potential contract or business deal
- NOT given to government officials or government employees



Engaging in Political Activities

Rogers Corporation encourages employees to be involved personally in their communities and political affairs, including making personal political or charitable contributions and expressing personal political views. However, we must always make it clear that our personal views and actions are not those of the Company.

Rogers fully complies with all political contribution laws. Company funds may not be used for contributions of any kind to any political party or committee or to any candidate or holder of any government position unless such contribution is permitted by law and complies with Company policy. No Rogers employee nor anyone acting on the Company's behalf is permitted to make any direct or indirect political contribution or use Company assets or resources to support any political candidate or party unless specifically authorized in writing by the Global Director of Compliance & Integrity.

Rogers sometimes shares interests with industry groups that advocate and shape public policy positions on issues that are important to our Company, and to the clients and communities we serve. However, our membership in any specific trade associations does not mean that we endorse every position or issue that such organizations or their members may support through lobbying activities or otherwise.

What is expected of you?

- Take steps to ensure that your personal political opinions and activities are not viewed as those of the Company.
- Never pressure another employee to contribute to, support, or oppose any political candidate, party, or political effort.
- Holding or campaigning for political office must not create, or appear to create, a conflict of interest with your duties.
- Do not solicit contributions or distribute political literature during work hours and never use Company resources for such activities.
- Never make a political or charitable contribution with the intent to improperly influence someone or gain inappropriate advantage for Rogers Corporation.



Managing Insider and Confidential Information

Rogers Corporation directors and employees are prohibited from using material, non-public information (“MNPI”) regarding the Company or third parties for their own personal profit or the profit of anyone else. Accordingly, Rogers prohibits insider trading, including the purchase or sale of securities when in possession of material, non-public information. Also prohibited is any communication of material, non-public information to another person for purposes of trading on that information. This policy applies not only to insider trading relating to Rogers, but also to its business partners (such as suppliers and customers), since MNPI about these business partners may be obtained during the normal course of employment. In addition, this policy applies to employees even after leaving employment with Rogers for as long as the information remains confidential and non-public.

Directors, officers, and employees should maintain the confidentiality of information entrusted to them by the Company or by its customers, suppliers or partners, except when disclosure is expressly authorized or is required or permitted by law. Confidential information includes all nonpublic information (regardless of its source) that might be of use to the Company’s competitors or harmful to the Company or its customers, suppliers, or partners if disclosed.

■ What is insider trading?

Insider trading generally refers to the buying or selling of a security (for example, stocks, debt instruments, or bonds), while in possession of MNPI about the security. Information is “material” if a person would consider the information important in making a decision to buy or sell securities of that company. Material information can include positive or negative information about a company. Non-public information includes proprietary and other information about Rogers or other companies learned through employment with the Company that is not available to those generally outside of the Company. This non-public information may include sales and financial results, strategic plans, research results, introduction of new products, material contracts or new licensing agreements, anticipated government actions, significant personnel changes, and acquisition or divestiture information.

What is expected of you?

- Do not buy or sell securities of any company when in possession of any MNPI about the Company gained during employment with Rogers.
- Do not disclose any MNPI gained during employment to anyone outside of Rogers, including family members or friends.
- Comply with the Company’s Insider Trading Policy as well as all applicable laws and regulations regarding disclosures and the sale or purchase of Rogers securities.
- Seek guidance from the Legal & Compliance Department if you are unsure whether information is “material, non-public” or otherwise.
- Refer to the section in this Code entitled “Protecting Intellectual Property” and follow Company policies and procedures designed to protect the Company’s confidential information.



Complying with Competition and Antitrust Laws

Rogers Corporation is committed to complying with all applicable competition and antitrust laws. We must compete vigorously and fairly in our efforts to be successful, and we must only seek competitive advantage through lawful means. We must not act in ways that stifle the free market. Accordingly, we must not exchange information or enter into agreements or understandings with competitors, customers, suppliers, or other third parties that improperly influences free competition, research and development activity, or manufacturing, marketing, sales, or distribution practices.

■ What are competition and antitrust laws?

Competition and antitrust laws seek to promote and protect the competitive process. These laws prevent companies from entering into anti-competitive agreements (formal or informal) and prevent companies that have dominance in a particular market from abusing their position. Practices that damage competition, the ability of other companies to access a market, or consumers are generally prohibited by these laws. In many cases these laws can be applied to conduct that occurs outside a country's borders.

What is expected of you?

Do not engage in business dialogue with our competitors unless there is a legitimate business reason to do so. If you expect to engage in these types of discussions, you must take appropriate precautions, consulting with your supervisor and the Legal & Compliance Department, to ensure that your discussions focus only on permissible topics.

- Do not enter into agreements or understandings - whether written or oral, formal or informal - that are anti-competitive.
- Consult the Legal & Compliance Department before having discussions with competitors, or if you have any questions regarding whether a communication or agreement might be, or might give the appearance of being, anti-competitive.
- Avoid any discussion with a competitor on topics that are, or could give the appearance of being, anti-competitive, such as specific price or terms and conditions of sale to specific customers.
- Avoid exchanging non-public or other sensitive information with customers or other third parties where not necessary for legitimate business purposes, or in the case that it could give the appearance of an inappropriate agreement.



Promoting Health and Safety

We have a clear responsibility to protect our coworkers, our community, and ourselves by making health and safety the primary consideration in everything we do. We integrate safety and health considerations into our decision-making and work to identify existing and emerging risks. We seek to mitigate risks to the health and safety of our employees and others who visit or work on our premises and the communities in which we operate. We promptly and effectively respond to, investigate, and share the learning from safety and health incidents, or near-incidents, taking any appropriate corrective action as necessary.

■ What is health and safety?

Health and safety includes the prevention of illness and injury and the promotion of well-being in the workplace. Health and safety laws and regulations exist to safeguard the working conditions of employees and visitors to business premises.

What is expected of you?

- Understand the hazards associated with your work, raise awareness of safety and health issues, manage risks responsibly, and only undertake work for which necessary health and safety training has been provided.
- Comply with all safety standards and requirements applicable to your position and workplace.
- Promptly report incidents, including near-misses, as well as deviations or non-compliance with this Code, and any other matters posing a threat to health and safety.



Protecting the Environment

Rogers Corporation is committed to carrying out its business in an environmentally responsible manner and integrating environmental considerations into our regular decision-making and work activities.

We work to understand and responsibly manage existing and emerging risks to the environment associated with, or affected by, our business activities.

We manage our environmental impact and seek to improve the sustainability of our activities by, among other things, economizing on our use of non-renewable energy and raw materials, minimizing the amount of waste we generate, recycling products and eligible waste, controlling the potential impact on air and water, and minimizing any adverse environmental effects associated with our products.

We promptly and completely investigate and respond to incidents that result in, or have the potential to cause, environmental harm.

What is expected of you?

- Act only when appropriate environmental procedures are in place.
- Understand the way in which our work may affect the environment and seek to continually improve and reduce the environmental impact of our business activities.
- Actively participate in energy-saving and waste-reduction programs.
- Only undertake work for which necessary environmental training has been provided.
- Do not bypass or disable any control devices required to be in compliance with our environmental permitting requirements.
- Immediately report any malfunction of environmental control devices.



Protecting Company Property and Resources

To perform our jobs, we need access to appropriate resources, such as computers, cell phones, equipment, plants, and other Company property. These resources may be used only for Company-authorized activities and may not be used for personal gain. We have a duty to protect these assets from loss, damage, theft, misuse, and waste.

■ What are company resources?

Company resources include physical and intangible assets. Physical assets include items such as materials, supplies, computers, and equipment; while intangible assets include information, brand protection, employee time and talents, confidential information, and other intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business and marketing plans, engineering and manufacturing ideas, designs, databases, records, and any nonpublic financial data or reports.

What is expected of you?

- Act appropriately and responsibly with Company resources, including your own time and the time of others.
- Never use, take, or permit others to use or take, Company property and resources, including information contained in printed or electronic format, on portable memory devices or on other electronic storage devices or cloud storage, for personal or non-company purposes whether at the office (in or out of working hours), or at any other location.
- Properly store all confidential information when not in use.
- Any suspected incident of fraud or theft should be reported for investigation immediately.



Maintaining Records and Making Disclosures

Rogers and all of its employees must maintain accurate and complete records (including accounts) that provide a true and fair picture of the Company's business activities and financial position. We must not alter or falsify Company records, nor destroy any records, except in accordance with our records retention policies.

Rogers Corporation and its employees must provide full, fair, and accurate disclosures of Company information in a timely and understandable manner as required by law or pursuant to Company procedures. Only those authorized to speak on behalf of the Company may do so.

We must also comply with generally accepted accounting principles when creating and maintaining our financial records.

Nothing in this Code or company policy is intended to prohibit employees from reporting suspected violation of law or regulations directly to a government agency.

■ What are records and disclosures?

Records are any documents created in the course of Rogers Corporation's business, including contracts, accounts, and financial and non-financial documents. Disclosures include documents published, filed, or submitted by Rogers to its shareholders, regulators, and other third parties as may be required by regulation or Company policy. Records and disclosures can be in paper or electronic form, and disclosures may also be made verbally.

What is expected of you?

- Keep complete and accurate records for the appropriate time period under the Company's Records and Information Management Policy.
- Only speak on behalf of the Company when authorized to do so. This includes all forms of electronic or news media outlets such as blogs, social media, and other communication avenues.
- Be aware of and comply with relevant record keeping laws, guidelines, standards, and principles relating to your area of the business.
- Enable the proper management of Company information by complying with relevant document retention and destruction rules.
- Never amend or dispose of records that are relevant to investigations or litigation involving the Company or its employees.
- Only disclose Company information to other Company employees or third parties on a need-to-know basis and pursuant to Company policy.



Financial Reporting

Each director, officer, and employee who contributes in any way to the preparation or verification of the Company's financial statements and other financial information must ensure that the Company's books, records, and accounts are accurately maintained. Each director, officer, and employee must cooperate fully with the Company's Accounting and Internal Audit departments, as well as the Company's independent public accountants and counsel.

As Rogers is a U.S.-based public company, we are required to submit various financial reports and other filings to our shareholders and U.S. regulatory authorities. It is critical that these reports are complete, accurate, and timely, and you should act openly and honestly with individuals who prepare our financial statements, as well as with our internal and external auditors.

The integrity of Rogers' financial reporting is of the utmost importance. Accounting and financial reporting practices must be fair and proper, in accordance with generally accepted accounting principles, and using management's best judgment where necessary. Rogers prohibits practices that might lead to fraudulent financial reporting. In general, fraudulent financial reporting is any intentional or reckless conduct, whether by act or omission, that results in materially misleading or incomplete financial statements. Clear, open, and frequent communication among all management levels and personnel on all financial and operation matters will substantially reduce the risk of problems in the accounting and financial reporting areas, as well as help achieve operating goals.

What is expected of you?

- Comply with the legal and regulatory requirements that govern the preparation or submission of financial reports.
- Familiarize yourself with and follow all related Company policies, processes, and internal controls.
- Ensure that all reasonable and necessary steps within your area of responsibility are taken to provide full, fair, accurate, timely, and understandable disclosure in reports and documents that the Company files with or submits to its shareholders or regulatory authorities.
- If you are unsure, ask. For more information on how to ask a question or raise a concern, see the ["Asking Questions and Raising Concerns"](#) section of this Code.



Working with Suppliers and Other Third Parties

Rogers Corporation is committed to working only with third parties, such as contractors, distributors, agents, suppliers, joint venture partners, and licensing partners, who embrace standards of ethical business behavior that are compatible with our own.

In our interactions with suppliers and other third parties, Rogers and its employees must conduct themselves with honesty and integrity, fostering mutual respect and collaboration. We implement the provisions of this Code in our everyday dealings with these third parties and require suppliers and other third parties to acknowledge and comply with all relevant provisions of our Code, including those related to labor and human rights, health and safety, the environment, bribery, and fair competition.

What is expected of you?

- Act with honesty and integrity in all our dealings with suppliers and other third parties.
- Require suppliers and third parties who act on our behalf to follow standards of conduct that are no less rigorous than those we follow in conducting our own affairs.
- Implement mechanisms to review third-party conduct on an ongoing basis.
- Implement and adhere to procurement policies that encourage ethical and compliant behavior by those with whom we do business, including responsible mineral sourcing.
- If you know or suspect that a supplier is violating a Company policy or the law, immediately notify your manager or supervisor, the Legal & Compliance Department, the Director of Global Compliance & Integrity, or the Ethics Hotline.



Protecting Personal Information

Rogers Corporation is committed to protecting any personally identifiable information (“PII”) collected or held, and to complying with all privacy, data protection, and associated applicable laws.

We collect, use, and retain only as much PII as is necessary for our legitimate business purposes, or to satisfy any legal requirements. Where required by law, we obtain consent to such collection and use, and inform each person, if the use is not obvious to them, about the purposes for which their personal information will be used.

Personal information must be deleted and updated in accordance with our legal obligations and Company document retention policies once its purpose has been fulfilled. We must only share personal information with affiliates and third parties if they have a legitimate need to know it, and only if we are reasonably assured that they will deploy suitable safeguards over the information once it is in their possession, or if required by law.

■ What are privacy and data protection laws?

Privacy and data protection laws regulate the collection, storage, use, and disclosure of personal information of individuals. This can include information about employees, and employees of third parties.

■ What is PII?

PII is information that can be used to identify an individual, either by itself or when combined with other information. This includes information that directly identifies an individual, such as their name, address, phone number, or email address. It also includes information that can indirectly identify an individual, such as a combination of their gender, race, birth date, or geographic indicator. Other examples of PII include social security numbers, passport numbers, driver’s license numbers, and financial account or credit card numbers.

What is expected of you?

- Collect, use, store, and share personal information in accordance with applicable privacy and data protection laws and Company policies and only where there is a legitimate business need to do so.
- Obtain approval from the relevant Human Resources representative or designated data privacy contact before collecting, accessing, or using such information if not expressly authorized by Company policy or if there is any doubt about the basis on which personal information is to be processed.
- Where access is available, regularly confirm the accuracy of your employee data.
- Notify the Legal & Compliance Department if you see any person misusing or not protecting any personally identifiable information (PII).
- Have a question? Contact Data.Privacy@rogerscorporation.com.



Using Artificial Intelligence Responsibly

Rogers has introduced a policy to guide the responsible use of artificial intelligence (AI) within its operations, acknowledging both the potential benefits and risks associated with AI technologies. This policy aims to ensure the protection of Rogers' information and compliance with laws, regulations, and ethical standards, while aligning with the Company's culture of openness, trust, and integrity. It covers all Rogers personnel and applies to all information systems owned or accessed by Rogers.

■ What is “Generative AI”?

“Generative AI” is a computer technology used to perform tasks that would normally require human intelligence, such as creation of new content, visual perception, speech recognition, decision-making, and translation between languages.

The Generative AI Policy outlines specific guidelines for its use, including approval requirements, best practices, and prohibitions to prevent misuse and protect confidential information. All Rogers personnel must understand and comply with these guidelines, which include obtaining prior approval for Generative AI use, ensuring data privacy, and avoiding reliance on AI for critical tasks without a backup plan. Generative AI tools are permitted for specific purposes such as general knowledge, code development, and research and development, provided they do not involve Rogers' confidential information without proper authorization. All output from Generative AI must be validated by humans, and the use of Rogers' credentials for signing up for AI tools is restricted to approved systems.

Intellectual property rights must be respected, and all AI use must adhere to applicable laws, regulations, and Rogers policies. The policy outlines compliance measures, including monitoring and disciplinary actions for violations. The Chief Information Officer (CIO) is the policy owner, responsible for its enforcement and updates. Exceptions to the policy require the CIO's approval. The policy also clarifies that it does not restrict actions protected or required by law, ensuring that it balances the innovative use of AI with legal and ethical considerations.

What is expected of you?

- Use only Rogers' internal approved AI tools.
- If you need to use an AI tool that Rogers does not currently have, obtain approval before using any new AI system.
- Make sure to adhere to applicable laws and the Rogers Generative AI Policy.
- All work created using generative AI must be validated by a human.



Complying with Trade Controls

Rogers Corporation is committed to conducting its business in compliance with all applicable trade regulations and restrictions that have been approved by recognized national and international authorities, including the United States, the European Union, the United Kingdom, China, and any country in which the company conducts business. We must not participate in any boycotts or trade restrictions that are not sanctioned by the U.S. government.

We must obtain any necessary licenses for the import and export of our products, technologies, services and technical data, as well as provide accurate, truthful information about our products to customs authorities.

■ What are trade restrictions?

Trade restrictions (including sanctions or embargoes) seek to prevent or limit trading with specific people or in specific countries. Trade is not limited to physical goods but can also apply to information and software. Boycotts involve a country refusing (for whatever reason) to do business, or prohibiting others from doing business, with one or more other countries.

What is expected of you?

- Comply with all relevant local trade compliance laws, regulations, and Company policies and procedures for import and export.
- If you are unclear about what trade restrictions apply, consult the Legal & Compliance Department to verify that any trade controls you are subject to have been met and you have all required approvals by authorities recognized by the Company.
- Report promptly to the Legal & Compliance Department all actions or requests that may be related to prohibited boycotts.
- Watch out for any “red flags” or suspicious behavior on the part of those with which we do business.



Rogers Ethics Hotline

Rogers Corporation is committed to an open and honest environment.

Anyone who raises a concern in good faith about a possible breach of this Code, violation of policy, or any other compliance concern, will not be subject to retaliation. Any act or threat of retaliation is considered a serious violation of this Code.

You may at some time come across a situation that may appear to violate this Code, Company policy, or applicable law. You also may have questions about this Code, a Company policy, or a particular situation. You are encouraged to ask questions, seek clarification, or raise a concern through appropriate channels. In general, you should first seek to address your question or concern with your supervisor. If you believe this is not appropriate under the circumstances, you may also contact Human Resources, the Director of Global Compliance & Integrity or the Legal & Compliance Department.

If you prefer to contact someone outside your area, or submit a report anonymously, you may also utilize our confidential Ethics Hotline:

Belgium	0800.13.338
China	4001209079
Germany	0800.181.2922
Hungary	06.80.020.304
Japan	0800.600.0083
Mexico	8008801716
Singapore	8004922775
South Korea	00744815
Taiwan	00801.49.1870
United Kingdom	0800 066 8925
United States	1.844.841.1348

OR via the web: <http://rogerscorp.ethicspoint.com>

For the most current contact information, as well as other helpful materials, please see the [Compliance & Integrity page of RogersNET](#).





www.rogerscorp.com

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