

The Eastern Company Corporate Policy Manual

Item: 101B – Code of Ethics for Financial Employees
Issue Date: Revised February 2026

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CODE OF ETHICS FOR FINANCIAL EMPLOYEES

A. Purpose

The purpose of this Code of Ethics for Financial Employees (this “Code”) is to promote (i) the honest and ethical conduct of our executives and principal financial employees, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships; (ii) full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, the Securities and Exchange Commission (the “SEC”) by the Company and in other public communications made by the Company; (iii) compliance with all applicable laws, rules and regulations; and (iv) the prompt internal reporting of violations or potential violations of this Code. This Code is applicable to the Company’s Chief Executive Officer, Chief Financial Officer, Treasurer, Audit Director and such other executives and principal financial and accounting employees as the Audit Committee (the “Audit Committee”) of the Board of Directors (the “Board”) of Eastern may deem to be covered by this Code from time to time (collectively referred to herein as “finance personnel”). References in this Code to the “Company” or “Eastern” mean The Eastern Company and its divisions and subsidiaries. Waivers of, or amendments to, this Code may be made only by the Board and will be promptly disclosed in accordance with the rules of the SEC and any other applicable requirements then in effect.

B. Introduction

One of Eastern’s core values is ensuring the ethical and professional conduct of its finance personnel worldwide. This Code sets forth the fundamental principles which Eastern finance personnel are expected to adhere to and uphold. Finance personnel are expected to unequivocally abide by this Code as well as all other applicable Company policies and procedures relating to areas covered by this Code.

All Company finance personnel are required to adhere to and advocate the following principles and responsibilities governing their professional and ethical conduct:

- Act with honesty and integrity in good faith, with due care, competence and diligence.
- Comply with all applicable laws, rules and regulations of federal, state, and local governments, and other appropriate regulatory agencies including any applicable stock exchange or self-regulatory organization.
- Promote an environment of truthful disclosure and honesty.
- Avoid actual or apparent conflicts of interest between personal and professional relationships.
- Report information that is accurate, complete, fairly stated, timely and understandable, as set forth in Section C below, without misrepresenting or omitting any material facts, including material information that may affect the Company’s public filings.
- Respect the confidentiality of information acquired in the course of their work except when authorized or otherwise legally obligated to disclose such information. Confidential information acquired in the course of work must not be used for personal advantage.

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- Promptly report any suspected (i) violation of applicable laws, (ii) violation of this Code or the Company’s Code of Business Conduct and Ethics, (iii) material weaknesses or significant deficiencies in internal controls or (iv) fraud, in each case in accordance with the procedures set forth in Section E below.

C. Accurate Reports and Communications

Full, fair, accurate, timely and understandable disclosure in our periodic reports and other documents filed with, or submitted to, the SEC and in other public communications made by the Company is required by the Sarbanes-Oxley Act of 2002 and SEC and Nasdaq rules and regulations and is essential to our ongoing success. All Company finance personnel must exercise the highest standard of care in preparing such reports, documents and communications in accordance with the guidelines set forth below:

- All Company accounting records, as well as reports produced or generated from those records, must be kept and presented in accordance with all applicable laws, rules and regulations.
- All accounting records must fairly and accurately reflect the transactions or occurrences to which they relate.
- All accounting records must fairly and accurately reflect the Company’s assets, entries, liabilities, revenues and expenses.
- No accounting records may contain any intentionally false or misleading entries.
- No transactions may be intentionally misclassified as to accounts, departments or accounting periods.
- All transactions must be supported by accurate documentation and recorded in the proper account and in the proper accounting period.
- No information may be concealed from the internal auditors or the independent auditors.
- Compliance with Generally Accepted Accounting Principles and the Company’s system of internal accounting controls is required at all times.
- Unrecorded or “off the books” funds or assets should not be maintained.

D. Conflicts of Interest

In addition to this Code, the Company has a Code of Business Conduct and Ethics (Policy 101) applicable to all employees, officers and directors, which sets forth actions and activities that may constitute a conflict of interest. It is imperative that finance personnel comply with the Company’s Code of Business Conduct and Ethics and avoid any investment, interest or association that interferes, might interfere, or might create the appearance of interfering with or compromising their independent exercise of judgement in the Company’s best interest. Finance personnel who have any doubt as to whether certain actions or conduct

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would be considered a conflict of interest should consult their immediate supervisor or the Chief Financial Officer of the Company.

E. Reporting

Finance personnel who become aware of a possible violation of this Code are required to promptly report such possible violation. Possible violations may be reported anonymously, either orally or in writing, by calling (888) 883-1499 (toll-free), emailing report@telesentry.biz or texting (203) 221-1742, as set forth in more detail in the Company's Anonymous Hotline Policy. Each of these methods of reporting is available 24 hours a day, 7 days a week. Failure to report a violation constitutes a violation of this Code and can lead to disciplinary action against the person who failed to report the violation.

Possible violations of this Code can also be reported directly to the Chief Financial Officer of the Company, the Chair of the Audit Committee or the Chairman of the Board. The Company will take reasonable steps to ensure that the identity of the reporting employee is kept confidential, except to the extent the reporting person consents to being identified or the identification is required by law or is otherwise necessary to conduct a full and complete investigation of the possible violation.

The Company will not tolerate retaliation against employees who have made, in good faith, a report of a possible violation of this Code. Any employee who is found to have retaliated against an employee for reporting possible violations of this Code will be subject to disciplinary action, up to and including termination of employment.

F. Enforcement

Violations of this Code may result in disciplinary action, up to and including termination of employment.