

## *Code of Business Conduct and Ethics*

### *Ducommun Incorporated*

#### **Purpose**

This Code of Business Conduct and Ethics (the "Code") has been adopted by the Board of Directors of Ducommun Incorporated to promote honest and ethical conduct, to enhance compliance with applicable governmental laws, rules and regulations, and to provide guidance to employees, officers and directors with respect to their business conduct. Compliance with the Code strengthens the Company's core values of honesty, professionalism, respect, trust and teamwork to ensure Company culture aligns with the high levels of service fundamental to the Company's mission. The Code also plays a critical role in maintaining the Company's unwavering commitment to moral integrity and legacy of excellence in delivering outstanding value, quality and performance to its customers and shareholders.

#### **Applicability**

The Code applies to all employees, vendors, officers and directors of Ducommun Incorporated and its subsidiaries (collectively, the "Company"). The word "employees" includes all individuals and officers employed by the Company and its subsidiaries, and when they are acting on behalf of the Company, directors. The Company's vendors, agents, representatives and business partners are also expected to adhere to the Code when providing goods or services to the Company.

#### **Principles and Practices**

The Code does not cover every issue that may arise, but sets out basic principles to guide all employees, vendors, officers and directors of the Company. All such persons are expected to conduct themselves in accordance with the Code and seek to avoid even the appearance of improper behavior. If a law conflicts with a policy in the Code, persons must comply with the law.

The Company may from time to time adopt more detailed policies and procedures with regard to certain areas covered by the Code and other matters not mentioned herein. Compliance with the Code and the Company's policies and procedures are a condition of employment and required for all persons rendering goods or services to the Company.

#### **1. Conflicts of Interest**

Employees should avoid any activity that may result in a conflict of interest with the Company. Employees should report any actual or potential conflict of interest to the general counsel of the Company.

A "conflict of interest" occurs when a person's private interest interferes, or appears to interfere, in any way with the interests of the Company. While it is not possible to describe all circumstances where a conflict of interest may exist, a conflict of interest situation can arise when actions or personal interests may make it difficult to perform work objectively and effectively. Conflicts of interest also may arise when an employee, or a member of their family, receives improper personal benefits as a result of their position in the Company. For example, loans to, or guarantees of obligations of, employees and their families may create conflicts of interest.

Additionally, there may be actual or potential conflicts of interest where an employee works or consults for a competitor, customer or vendor of the Company, or accepts gifts or favors of more than \$100 from an actual or prospective competitor, customer or vendor (other than for reasonable business entertainment, as described below). In order to avoid the appearance of a conflict of interest, employees must disclose to the Company's general counsel or vice president of human resources any direct or indirect business connection with any of the Company's customers, vendors or competitors, other than on behalf of the Company. A conflict of interest also may arise if an employee or a family member has a financial interest (excluding ownership of less than 5% of a publicly traded

company) in a competitor, customer or vendor of the Company. Conflicts of interest are prohibited as a matter of Company policy, except as approved by the Board of Directors in accordance with the procedures of this Code. If you have a question about conflicts of interest, you should contact the Company's general counsel or vice president of human resources.

## **2. Corporate Opportunities**

Employees are prohibited from taking for themselves personal opportunities that are discovered through the use of Company property, information or their position without the consent of the Board of Directors. Employees must not use corporate property, information or their position for improper personal gain, and employees shall not compete with the Company, directly or indirectly. Employees owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

## **3. Confidentiality**

Employees and third parties engaged in business with the Company should maintain the confidentiality of information entrusted to them by the Company, its customers, vendors, or otherwise acquired in the course of their duties, except when disclosure is authorized or legally mandated. Confidential information includes but is not limited to, employee data and other personally identifiable information obtained within the scope of employment and all nonpublic information that might be of use to competitors, harmful to the Company or its customers or vendors, if disclosed, or provides an economic advantage to the Company because the information is not generally known. Confidential information also includes information that customers and vendors have entrusted to the Company. The obligation to preserve confidential information continues even after employment ends. Any documents, papers, records, or other tangible or intangible items that contain trade secrets or proprietary information are the Company's property, even if created by an employee or contractor. Items containing trade secrets will remain confidential until such time as the information is no longer considered to hold that status.

## **4. Data Privacy and Information Security**

Employees are required to observe the provisions of all policies regarding data protection, privacy and confidential information that the Company may adopt from time to time, as well as any applicable laws relating to data protection and privacy. If you become aware of any instance of inappropriate handling of information or data or any security breach, you must immediately notify an immediate supervisor, and the Company's general counsel or head of information security.

## **5. Fair Dealing**

The Company seeks to outperform its competitors fairly and honestly. Employees should endeavor to deal fairly with the Company's customers, vendors, competitors and their colleagues. Employees should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound business relations. No gift or entertainment should be offered, given, provided or accepted by any Company employee or family member of an employee, unless it (i) is not a cash gift, (ii) is consistent with customary business practices, (iii) is not excessive in value, (iv) cannot be construed as a bribe or payoff, and (v) does not violate any laws or regulations.

## **6. Protection and Proper Use of Company Assets**

Employees should protect the Company's assets and insure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability. Any suspected incident of fraud or theft should be immediately reported to an immediate supervisor, or the Company's general counsel or vice president of human resources for investigation. Company equipment should not be used for non-Company business, although incidental personal use may be permitted in some circumstances. If you have a question about the incidental personal use of Company equipment, you should contact your immediate supervisor.

The obligation to protect the Company's assets includes its proprietary information and intellectual property, including trade secrets, patents, trademarks, copyrights, business, marketing and service plans, engineering and manufacturing information, designs, databases, records, compensation information, and unpublished financial data and reports. Unauthorized use or distribution of such information violates Company policy.

## **7. Compliance With Laws, Rules and Regulations**

The Company's policy is to comply with all laws, rules and regulations that are applicable to its business. Third parties engaged in business with the Company must also respect and obey all applicable laws, rules and regulations. Where applicable laws, rules and regulations are ambiguous, employees must obtain legal advice from the general counsel of the Company to clarify their meaning and ensure compliance.

## **8. Insider Trading**

All employees must comply with the Company's Insider Trading Policy, a copy of which can be found at [investors.ducommun.com/corporate-governance](http://investors.ducommun.com/corporate-governance).

## **9. Discrimination and Harassment**

While employees, applicants for employment, and all others doing business with or seeking to do business with the Company must be qualified and meet the job requirements established by the Company, the Company is committed to providing equal opportunity in employment for all and maintains a zero-tolerance policy against any illegal discrimination or harassment. The Company's policies, practices and procedures reflect its strong commitment to respecting human dignity and maintaining a professional work environment that is free from abusive or intimidating conduct, threats, violence, bullying, and other offensive behavior. A violation of these policies may also be a violation of applicable law.

## **10. Health, Safety and Environmental**

The Company's policy is to comply with all applicable laws, rules and regulations relating to safety in the workplace and protection of the environment. Corporate environmental responsibility underlies the Company's business and operating strategies, with a focus on implementing policies and practices to ensure the Company operates responsibly, ethically and sustainably. Each employee has a responsibility for maintaining a safe and healthy workplace for all by following health, safety and environmental rules, regulations and practices, and reporting any accidents, injuries and unsafe equipment, practices or conditions.

## **11. Anti-Bribery and Corruption**

The United States Foreign Corrupt Practices Act prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. The Company's policy is to prohibit any illegal payments to government officials of any country. The United States government also has a number of laws and regulations regarding dealings with its personnel. Any promise, offer or delivery to an official or employee of the United States government of a gift, favor or other gratuity is prohibited.

Employees are prohibited from engaging in corrupt business practices and fraudulent activity, which is defined as deceit, trickery, dishonesty, or breach of confidence through improper use of information shared under an obligation of confidentiality, intentionally perpetrated for profit or to gain an unfair or dishonest advantage. This includes, but is not limited to acting under false pretenses, falsification of information or intentional omissions, and false and deliberate misuse of qualified resources or certifications/authorizations such as stamps, electronic signatures or passwords. Fraudulent activity is a violation of Company policy and may result in disciplinary action, up to and including immediate termination. Any discovered fraudulent activity will be promptly investigated by the Company's general counsel or vice president of human resources and disclosed as applicable. If you become aware of misconduct involving employees or contractors, you must promptly notify the Company's general counsel or vice president of human resources.

## 12. Recordkeeping

The Company's books, records, accounts and financial statements must be maintained in reasonable detail, fairly reflect the Company's transactions, and conform to both applicable legal requirements and to the Company's system of internal controls. No false or misleading entries may be made for any reason, and no employee may assist any person in making a false or misleading entry. Employees shall provide accurate and complete information to the Company's officers, legal counsel, internal and independent auditors, and any other person authorized to receive the information. Any employee having information or knowledge of any undisclosed or unrecorded transaction or the falsification of records should report it promptly to the Company's general counsel or to the Audit Committee of the Board of Directors through the Confidential Ethics Hotline referenced below.

## 13. Compliance and Accountability

An employee who becomes aware of a violation of the Code must report the matter. Ordinarily, the report may be made to the employee's immediate supervisor who, in turn, must report it to the Company's vice president of human resources. The employee also may bring the matter to the attention of any person identified in the text of the Code, or directly either to the Company's general counsel or vice president of human resources.

It is the policy of the Company not to allow retaliation for reports of misconduct by others made in good faith by employees. Employees are expected to cooperate in internal investigations of any misconduct.

For the avoidance of doubt, nothing in this Code is to be interpreted or applied in any way that prohibits, restricts or interferes with an employee's (a) exercise of rights provided under, or participation in, "whistleblower" programs of the SEC or any other applicable regulatory agency or governmental entity (each, a "Government Body"), or (b) good faith reporting of possible violations of applicable law to any Government Body, including cooperating with a Government Body in any investigation regarding possible violations of applicable law, or (c) right to engage in other legally protected communications. Moreover, the Company is strictly prohibited from retaliating against any employee that makes protected disclosures described in this section.

Concerns about unethical behavior should be reported to an immediate supervisor, a member of management, the internal audit department, or the Confidential Ethics Hotline at (800) 735-1265 or online at [www.ducommun.ethicspoint.com](http://www.ducommun.ethicspoint.com).

## 14. Waiver

Any request for a waiver of any provision of the Code, including the reasons for such request, must be submitted in writing and addressed to the vice president of human resources of the Company, with a copy addressed to the general counsel. An officer (including the president of any subsidiary) or director must submit the request for a waiver to the chairman of the Audit Committee of the Board of Directors. Any waiver of the Code for officers or directors may be made only by the Board of Directors, and will be disclosed within four business days after such determination by the Company as required by law and the listing requirements of the New York Stock Exchange ("NYSE").

## 15. Amendments

The Board of Directors has the exclusive authority to amend the Code. If an amendment to this Code is made, appropriate disclosure will be made within four business days after such determination by the Company as required by law and the listing requirements of the NYSE.

ADOPTED BY THE BOARD OF DIRECTORS ON AUGUST 6, 2025.