



CODE OF BUSINESS CONDUCT AND ETHICS PUBLISHED 2025

It is the express intent of Sealy & Company to establish and maintain the highest standards of business conduct and ethics when dealing with any and all parties. No employee, director, officer, agent or contractor (hereafter "Associate") of Sealy or any company for which Sealy serves as sponsor or manager (collectively, the "Company") shall engage in any activity related to Company business that is or gives the appearance of being illegal, unethical, inappropriate, or improper in any way. The Company, by the nature of its business, is privy to a variety of confidential information, including business ventures, developments, decisions, problems, capabilities, and operations of the Company and its investors and stakeholders. For these reasons, each Associate of the Company must accept responsibility for personal behavior and ethical job performance.

Consider your actions; if necessary, ask for guidance.
Four "yes" answers are required to qualify an action as ethical.

- Is it legal? o If you think an action may be illegal, do not proceed. If you need information about which laws apply in a given situation, talk with your Supervisor or Human Resources.
- Is it consistent with Company policy? o If the proposed action does not comply with Company policy, you should not do it.
- Is it consistent with Company values? o Consider whether the action would be consistent with our Company's core values
- If it were made public, would I be comfortable? o Ask yourself if you would make the same decision if you knew that it would be reported on the front page of tomorrow's newspaper.

It is expected that all Associates of the Company will adhere to the following policies:

COMPLYING WITH THE LAW

All Associates of the Company should comply with all applicable laws, including, to the extent applicable, insider trading laws, rules and regulations of the U.S. and other countries, and of the states, counties, cities, and other jurisdictions in which the Company may conduct its business.

This Code of Business Conduct & Ethics (this "Code") does not summarize all the laws, rules, and regulations applicable to the Company and its Associates. Please consult Human Resources or the Employee Handbook if you have any questions.



CONFLICTS OF INTEREST

All Associates of the Company should be scrupulous in avoiding a conflict of interest with regard to the Company's interests. A "conflict of interest" exists whenever an individual's private interests interfere or conflict in any way (or even appear to interfere or conflict) with the interests of the Company. A conflict situation can arise when an Associate takes actions or has interests that may make it difficult to perform their work objectively and effectively. Conflicts of interest may also arise when an Associate or members of their family receive improper personal benefits as a result of their position in the Company, whether obtained from the Company or a third party.

Loans to, or guarantees of obligations of, Associates and their respective family members may create conflicts of interest. Similarly, service by a Company employee, director, or officer on the board of directors, advisory board, or similar board or committee of any for-profit enterprise other than the Company may create conflicts of interest. Such activities are prohibited without the prior written approval of such person's supervisor and the Company's Director of SEC Reporting or Compliance Officer, or if none, the Company's legal counsel. Conflicts of interest are prohibited as a matter of Company policy, except under guidelines approved by the principals of Sealy or the Company's legal counsel. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with higher levels of management, Human Resources, or the Company's legal counsel. Any Associate who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor, manager, or other appropriate personnel or consult the procedures described in this Code.

CORPORATE OPPORTUNITY

Associates are prohibited from (a) taking for themselves, personally, opportunities that properly belong to the Company or are discovered using corporate property, information, or position; (b) using corporate property, information, or position for personal gain; and (c) competing with the Company, directly or indirectly. Associates owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

CONFIDENTIALITY

Associates of the Company must maintain the confidentiality of confidential information entrusted to them by the Company or its suppliers or customers, except when disclosure is authorized by the Company's legal counsel or required by Law, regulation, or legal proceeding. Whenever feasible, Associates should consult Human Resources, the Company's legal counsel, or Company principals if they believe they have a legal obligation to disclose confidential information. Confidential information includes all non-public information that might be of use to competitors of the Company, or harmful to the Company or its customers if disclosed. The obligation to safeguard confidential information continues even after employment with the Company ends.



FAIR DEALING

Each Associate should endeavor to deal fairly with the Company's customers, suppliers, competitors, officers, and employees. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

PROTECTION AND PROPER USE OF COMPANY ASSETS

All Associates should protect the Company's assets and ensure their efficient, intended use. Theft, carelessness, and waste have a direct impact on the Company's profitability. All Company assets, including the Company's premises, computers, servers, software, email, and conferencing technology, should be used for legitimate business purposes. Personal use of the Company's computer systems for Internet browsing and email communication can expose the Company to phishing scams, computer viruses, and malware and ransomware attacks, and is prohibited.

ACCOUNTING COMPLAINTS

The Company's policy is to comply with all applicable financial reporting and accounting regulations applicable to the Company and for entities it sponsors or manages. If any Associate of the Company has concerns or complaints regarding questionable accounting or auditing matters of the Company, then he or she is encouraged to submit those concerns or complaints (anonymously, confidentially, or otherwise) to the Company Hotline. Such submissions may be directed to the attention of Human Resources, Company legal counsel, and/or the principals of the Company. Ensuring accurate and complete business and financial records is everyone's responsibility, not just a role for accounting and finance personnel. Accurate recordkeeping and reporting reflect the Company's reputation and credibility and ensures that the Company meets its legal and regulatory obligations.

- Always record and classify transactions in the proper accounting period and the appropriate account and department. Do not delay or accelerate the recording of revenue or expenses to meet budgetary goals.
- Estimates and accruals must be supported by appropriate documentation and be based on your best judgment.
- Ensure that all reports to regulatory authorities are full, fair, accurate, timely, and understandable. Never falsify any document.
- Do not distort the true nature of any transaction.

INSIDER TRADING INTRODUCTION

Rule 10b-5, promulgated under the Securities Act of 1933, as amended, generally makes it unlawful for any person to use, either directly or indirectly, material inside information that has not been publicly disseminated in connection with the purchase



or sale of securities. The Insider Trading and Securities Fraud Enforcement Act, passed by Congress in 1988, and Securities and Exchange Commission rules thereunder, were promulgated to address the abuses of disclosing non-public information. The Company's Associates are expected to abide by the rules and regulations applicable to insider trading. Any material changes or updates to insider trading laws shall be disseminated to Associates, and this Code shall be updated accordingly.

For the most part, the Company's private placement and related activities do not involve publicly traded securities. As a result, it is unlikely that, in the ordinary course of their daily activities at the Company, employees, directors, officers, agents, and Associates relating to publicly traded securities. Nevertheless, from time to time, Company personnel may become aware of developments (for example, substantial real estate transactions, leasing, foreclosure, or other events) that could have a material impact on the Company with publicly traded securities outstanding. It is the Company's policy that no Associate may trade either personally or on behalf of others, directly or indirectly, in any security of any issuer about which the Associate possesses material non-public information at or before the time the information is publicly disclosed, nor may the Associate communicate any material non-public information to anyone outside the Company (including customers, suppliers, family members, and others).

Associates shall promptly consult the Company's Director of SEC Reporting or Compliance Officer if they have questions about any information they have received or a transaction they are contemplating, or if they suspect inside information may have been obtained or disclosed in a manner that violates the Company's policies.

DEFINITIONS RELATED TO THE CODE OF ETHICS

"Confidential information" includes non-public information and related materials, such as inside information provided by an external source with the expectation that the information will be kept confidential and will be used solely for the business purpose for which it was conveyed. Confidential information may include "tips" received directly or indirectly from corporate insiders. Tips are especially likely to be considered confidential information when the recipient knows, or should know, that the ultimate source of the information was from a corporate insider or other person subject to similar fiduciary duties.

"Insider trading" involves buying or selling a security, in breach of a fiduciary duty or other relationship of trust and confidence, while in possession of material, non-public information about the security.

"Inside information" is synonymous with material non-public information.



"Material information" is that which a reasonable investor would likely view as information important in deciding whether to purchase, sell, or hold a security. Material information may include, but is not limited to, information about changes in a Company's accounting procedures; expansion or curtailment of operations; increases or declines in income, profitability, production, or sales; significant product developments; major litigation; liquidity problems; management changes; restructurings; or purchases or sales of assets. It may also relate to uncertain or contingent events, such as potential mergers or acquisitions.

"Non-public information" is information that has not been effectively disseminated to the general public (i.e., confidential, or proprietary information) via, for example, releasing a press statement over a major news wire, printing an article in a major news publication, or publishing a regulatory filing.

"Proprietary information" is non-public information created or obtained by a Company for business purposes.

"Security" types include, but are not limited to, all forms of stock, limited partnership interests, notes, bonds, debentures, investment contracts, rights, or units, as well as warrants, options, security-based commodities, futures, swaps, or other derivative contracts.

"Tipping" involves knowingly or unknowingly providing material non-public information to others, except in the necessary course of business, in which the person receiving the information (the "tippee") knows or should know to treat the information as material and non-public.

MISUSE OF MATERIAL NON-PUBLIC INFORMATION

The Company's Associates may not buy or sell any security on the basis of material non-public information relating to the security, nor may they recommend, advise, or suggest that another person buy, sell, or hold any such security.

The latter prohibition applies regardless of whether the tippee is already aware of the material non-public information. Confidential information obtained directly or indirectly from an external source may not be used for any reason other than the specific purpose or transaction for which it was provided. Likewise, proprietary information may not be used beyond the business purposes for which the information was created or obtained. Any other use of material non-public information is a misuse and may constitute insider trading or tipping.



SAFEGUARDING MATERIAL NON-PUBLIC INFORMATION

As a general matter, to prevent the misuse of material non-public information learned during the course of employment or other relationships with the Company, Associates must exercise extreme caution when discussing inside information on public transportation systems and in public areas, such as hallways, elevators, and restaurants. Even when such discussions are held in more private areas, such as individual offices, Associates should exercise caution (e.g., limiting use of speakerphones) to avoid the risk that confidential or proprietary information may be overheard by anyone who does not have a legitimate business need to hear it. Employees, directors, officers, agents, and contractors are also obligated to refrain from leaving documentation in public areas within the Company's principal office where unauthorized persons may gain access to material non-public information.

PENALTIES FOR ILLEGAL INSIDER TRADING AND TIPPING

Securities laws regarding insider trading and tipping expose violators to potential civil liability, as well as regulatory and criminal proceedings, including, but not limited to:

- Trading restrictions or other limitations on an individual or entity;
- Imprisonment;
- Significant fines and/or treble damages (three times the profit made, or loss avoided);
- Significant administrative sanctions up to \$1,000,000 or more; and
- Suspension or permanent bar of an individual or securities license.

REPORTING VIOLATIONS

If any Associate believes that he, she, or someone else may have obtained or disclosed insider information in a manner not permitted by the Company, the Associate must immediately notify the Compliance Officer and refrain from using or further disclosing such information. Reports of violations will be treated as highly confidential. Failure to report violations may result in disciplinary action, including termination of employment.

REPORTING ANY ILLEGAL OR UNETHICAL BEHAVIOR

Employees are encouraged to discuss observed illegal or unethical behavior with their supervisors, managers, or other appropriate personnel, and when in doubt, to consult with them about the best course of action in a particular situation. Associates who are concerned that violations of this Code or that other illegal or unethical conduct by Associates of the Company have occurred or may occur should contact either their supervisor or superiors. If they do not believe it appropriate or are not comfortable approaching their supervisors or superiors about their concerns or complaints, then they may contact either the Company's legal counsel or call the anonymous Company Hotline. If their concerns or complaints require confidentiality, including maintaining



their anonymity, then this confidentiality will be protected, subject to applicable Law, regulation, or legal proceedings.

Reporting:

- Via www.lighthouse-services.com/sealynet; or
- Fax alternative for written documents: 215.689.3885 (must include the Company name with Report)

Employees who report issues via the Hotline (866.860.0008) will have the option to remain anonymous if they choose.

NO RETALIATION

The Company will not permit retaliation of any kind by or on behalf of the Company and its Associates against good faith reports or complaints of violations of this Code or other illegal or unethical conduct.

PUBLIC COMPANY REPORTING

Certain entities which the Company sponsors or manages may file as a public registrant, and it is of critical importance that the Company's filings with the Securities and Exchange Commission be accurate and timely. Depending on their position with the Company, an Associate may be called upon to provide necessary information to ensure that the Company's public reports are complete, fair, and understandable. The Company expects Associates to take this responsibility very seriously and to provide prompt, accurate answers to inquiries related to the Company's public disclosure requirements.

VIOLATIONS

Should an Associate become aware of a violation or potential violation (whether accidental or deliberate) of any of the Company's ethical standards, it is their responsibility and obligation to disclose the matter fully to the appropriate parties as noted in this Code. The failure to report such violations can have a detrimental impact on the Company and its reputation and therefore is itself a violation of Sealy policy. The information reported will be held in the strictest confidence. Associates will not be disciplined nor retaliated against for reporting violations or potential violations in good faith. Therefore, Associates are encouraged to report any potential unethical and/or illegal behavior by an Associate. Should any Associate need to report such matters, they should contact the Employee's Supervisor and/or the VP – Human Resources in the Shreveport corporate office. Supervisors, who have potential unethical or illegal behavior reported to them by an Associate, should in turn report the information to the VP – Human Resources. The VP – Human Resources will ensure the information is objectively evaluated and reported as necessary to the appropriate Senior



Management Team member and/or legal counsel (if necessary). The reported information will be acted upon if, after a proper and thorough investigation, it is determined action is warranted. For reporting of potential violations of the Company's business conduct and ethics standards, the VP – Human Resources' contact information is listed below:

Debi Valentine, *VP – Human Resources*
DebiV@Sealynet.com
Main: 318.222.8700