



Creation Code of Ethics and Business Conduct



1. Introduction

Purpose

It is the policy of Creation Technologies Inc. and its subsidiaries and affiliates (collectively, “Creation” or the “Company”) to comply fully with all laws governing its operations and to conduct business in keeping with the highest moral, legal and ethical standards. To that end, the Board of Directors has adopted this Creation Code of Ethics and Business Conduct. Creation is built upon a foundation of strong corporate values and business practices.

Our Code of Business Conduct and Ethics is designed to deter wrongdoing and to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Compliance with applicable laws, rules, and regulations;
- The prompt internal reporting of violations of this Code; and
- Accountability for adherence to this Code.

This Code should help guide your conduct in the course of our business. Many of the principles described in this Code are, however, general in nature, and the Code, as is the case with any code or policy, cannot anticipate every situation that may arise. Use common sense and good judgment in applying this Code. If you have any questions about applying the Code, it is your responsibility to seek guidance.

Scope

All officers, directors, and employees of Creation, as well as third-party suppliers, subcontractors, vendors, agents, representatives, consultants and other business partners (“Company Personnel”) are required to perform their duties on behalf of the Company honestly, responsibly, and diligently, and in full compliance with this Code. No Company Personnel shall engage in any conduct that might reasonably be expected to raise questions as to the Company’s honesty and reputation or otherwise cause harm or embarrassment to the Company.

2. Guidelines for Ethical Decision-Making

General

Recognizing ethical issues and doing the right thing in all Creation business activities is your responsibility. When engaging in business activities for Creation, consider the following:

- What feels right or wrong about the planned action?
- Is the planned action consistent with the Code, the Company handbook and policies?

- How will the planned action appear to your leader, Company executives, the Board, your co-workers, and the general public?
- Would another person's input help to evaluate the planned action?

3. Responsibilities

Employee Responsibilities

All Company Personnel are expected to comply with both the letter and the spirit of our Code. This means you must understand and comply with all of our policies, laws and regulations that apply to your job, even if you feel pressured to do otherwise. Our Code also requires you to seek guidance if you have questions or concerns and to cooperate fully in any investigation of suspected violations of the Code that may arise in the course of your employment. Periodically, you may be asked to provide a written certification that you have reviewed and understand the Code, comply with its standards, and are not personally aware of any violations of the Code by others.

Leadership Responsibilities

Leaders, by virtue of their positions of authority, must be ethical role models for all employees. An important part of a leader's responsibility is to exemplify our corporate values and exhibit the highest standards of integrity. Leaders must communicate the seriousness of our company's expectations for ethical conduct and their own personal support of these expectations by holding everyone accountable for making sound ethical judgments. Leaders must be alert to any situations or actions that may be unethical or potentially damaging to our reputation. They must take prompt action to address such situations and be careful to avoid even the appearance of implicit approval.

4. Reporting and Investigations

You are obligated to report violations of the Code, the law, or any other company policy or procedure. If you have questions, concerns, or need to report a known or suspected violation, you should discuss it with your leader, any member of your leadership team, the legal department or a People & Culture representative, or contact the Ethics Helpline at <http://creationtech.ethicspoint.com/> where you can report your concern confidentially and anonymously.

Even if a concern is submitted other than anonymously, the Company will endeavor to protect the privacy and confidentiality of the reporting person to the extent reasonably possible. In any event, retaliation against any person reporting a concern is strictly prohibited, and no person shall be penalized for reporting a concern (unless found to have knowingly and willfully made a false report).



Once a report is received, the Company will investigate it promptly and thoroughly and make a determination whether the Code or the law has been violated and take appropriate corrective action. Creation expects all Company Personnel to cooperate in investigations fully and candidly.

5. Compliance with Relevant Laws and Regulations

It is important that you are aware of, and never intentionally violate, relevant laws and regulations in the United States, Canada, Mexico, China and all other applicable jurisdictions. You should understand that violations of laws or regulations may also result in legal proceedings and penalties including, in some circumstances, civil and criminal penalties that could affect you personally in addition to a risk of adverse consequences to Creation. You should also be alert to changes in the law or new requirements that may affect your business unit. The use of Company funds or assets for any purpose that would be in violation of applicable law and regulations is prohibited.

6. Conflicts of Interest

Company Personnel owe a primary obligation of business loyalty to the Company. In particular, Company Personnel must avoid situations in which their personal, social, or financial interests, duties, obligations or activities, or those of a family member are, or may be, in conflict or incompatible with the interests of the Company.

Employees must make prompt and full disclosure of any situation that may involve an actual or potential conflict of interest. Employees should contact their leader, any member of your leadership team, People & Culture representative or contact the Creation Ethics Hotline to make such disclosures, or to report any questions, problems or issues regarding conflicts of interest.

While it is impossible to list all activities that could pose a conflict of interest, the following are common examples:

Financial Interest

Conflicts of interest may arise if you or a family member has a direct or indirect financial interest in any enterprise that has, or seeks to have, business relationship with Creation, or that competes with Creation.

Outside Business and Other Interests

A conflict of interest exists if your outside business or other interests can affect your objectivity, motivation or performance as a Creation colleague. A second job or other affiliation with a Creation competitor is not allowed (other than in connection with your work for Creation, with appropriate approvals). A second job or other affiliation with a Creation customer, supplier or provider of goods or services is discouraged but may be allowed with proper approval. When outside employment is allowed, colleagues are still bound by all confidentiality agreements with Creation and all Creation policies and procedures relating to confidential or inside information.



Board Memberships, Officer, and Trustee Positions

Serving on the board of directors or an advisory committee of for-profit or non-profit organizations may present many opportunities for conflicts of interest. Before agreeing to become a member of the board of directors or an advisory committee of any for-profit organization, you should contact the legal department to determine the relationship, if any, existing between our company and the for-profit organization.

Employment of Relatives or Friends

While Creation permits the employment of close personal friends or relatives in the same site, a potential conflict arises if you hire, manage or otherwise do business with a friend, relative or someone with whom you have an intimate relationship. The actions of family members and friends outside the workplace can also create a conflict if their actions cause you to lose your objectivity in the workplace. Relationships should be disclosed to your leader and People & Culture team.

Gifts, Entertainment and Other Items of Value

As described in more detail in the Company's Anti-Bribery and Corruption Policy, you and your immediate family may not give or accept gifts, services, perks, entertainment, discounts, loans or other items of more than modest value to or from those who are doing business or seeking business with the Company.

Corporate Opportunities

You have a duty to our company to advance our legitimate interests should the opportunity arise. You should not take personal advantage of opportunities or favors offered to you by virtue of your employment with Creation. Discounts on personal purchases of a supplier or customer's products or services should not be accepted unless such discounts are offered to all employees in general.

Use of Company Funds and Assets

The assets of the Company consist of more than merely physical equipment and corporate funds; they include the Company's technologies, concepts, intellectual property and business strategies and plans, as well as day-to-day information regarding Company business. Company Personnel may not use any of these assets for personal gain.

7. Maintaining Accurate Financial Records and Internal Accounting Controls

Accurate and reliable records are crucial to our business. We are committed to maintaining accurate company records and accounts in order to ensure legal and ethical business practices and



to prevent fraudulent activities. We are responsible for helping ensure that the information we record, process, and analyze is accurate, and recorded in accordance with applicable legal or accounting principles. We also need to ensure that it is made secure and readily available to those with a need to know the information on a timely basis.

Company records include booking information, payroll, timecards, travel and expense reports, e-mails, accounting and financial data, measurement and performance records, electronic data files, and all other records maintained in the ordinary course of our business. All company records must be complete, accurate, and reliable in all material respects. There is never a reason to make false or misleading entries. Undisclosed or unrecorded funds, payments, or receipts are inconsistent with our business practices and are prohibited.

The following are examples of activities not allowed:

- Maintaining undisclosed or unrecorded funds or assets for any purpose;
- Making, or asking others to make, false, misleading, or artificial entries on an expense report, time sheet or any other report;
- Giving false quality or safety results;
- Recording false sales or recording sales outside of the time period they actually occurred;
- Understating or overstating known liabilities and assets;
- Delaying the entry of items that should be current expenses;
- Hiding the true nature of any transaction; and
- Providing inaccurate or misleading information for company benefit programs.

We rely on you to come forward if you feel that you are being pressured to prepare, alter, conceal or destroy documents in violation of our company policy. In addition, you must report to any of the individuals mentioned above if you have any reason to believe that someone has made a misleading, incomplete, or false statement to an accountant, auditor, attorney or government official in connection with any investigation, audit, examination or filing with any government agency or regulatory body.

8. Dealing with Independent Auditors

The Company's independent auditors have the responsibility to ensure fair financial statements and disclosures are contained in the Company's annual financial report before their release to the Board and the shareholders. Company Personnel will make certain that all disclosures made in financial reports and related documents are full, fair, accurate, timely and understandable. No Company Personnel shall make a false or misleading statement to the Company's independent auditors, nor



shall any Company Personnel conceal or fail to reveal any information necessary to make the statements to such independent auditors clear and accurate.

9. Anti-Money Laundering

Money laundering is a global problem with far-reaching and serious consequences. Money laundering is defined as the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions. Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery, and fraud. Involvement in such activities undermines our integrity, damages our reputation and can expose Creation and individuals to severe sanctions. Our company forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion. We take affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. Anti-money laundering laws of the United States and other countries and international organizations require transparency of payments and the identity of all parties to transactions. We are committed to full compliance with anti-money laundering laws throughout the world and will conduct business only with reputable customers involved in legitimate business activities and transactions.

Warning Signs of Money Laundering may include:

- Requests for cash payment, travelers checks or checks from an unknown third party;
- Complex payment patterns;
- Unusual transfers to or from countries not related to the transaction;
- Customers who seem eager to avoid recordkeeping requirements;
- Transactions involving locations previously associated with money laundering or tax evasion; or
- Transactions which are inconsistent with usual business practices, or which do not match the customer's or client's normal pattern of activity.

10. Fraud

It is never acceptable to take any part, no matter how small your role, in any activity that involves theft, fraud, embezzlement, extortion or misappropriation of property. Your participation in a fraud occurs any time that you help conceal, alter, falsify or omit information in our records either for your benefit or at the direction of any others. You must refuse to engage in any questionable activities and must follow up any suspicions.

11. Anti-Corruption/Anti-Bribery

Creation takes a zero-tolerance approach to bribery and corruption.

[Link to Creation's Policy](#)

Bribes

No Creation Personnel or other person associated with or acting on our behalf may engage, directly or through a third party, in any form of bribery. A bribe occurs when one party gives or offers another party, directly or indirectly, any reward, advantage, benefit or value of any kind in order to influence the making, or not making, or implementation of a decision or act. Creation prohibits facilitation payments (a form of bribery made for the purpose of expediting the performance by a governmental official for a routine government action) and kickbacks.

Gifts

The giving and receiving of gifts can present bribery and corruption issues. Gifts or hospitality must be reasonable, justifiable and proportionate and in compliance with the Creation Anti-Bribery and Corruption Policy. The Policy prohibits, among other things, Creation Employees from giving or accepting any gift or hospitality which exceed \$100 in value.

12. Anti-Trust & Fair Competition

We believe in free, honest and open competition. It is our policy that all directors, officers, and employees comply with antitrust and competition laws. These laws prohibit efforts and actions to restrain or limit competition between companies that otherwise would be competing for business in the marketplace. You must be particularly careful when you interact with any employees or representatives of Creation competitors. You should use extreme care to avoid any improper discussions with our competitors, especially at trade association meetings or other industry or trade events where competitors may interact. Under no circumstances should you discuss customers, prospects, pricing, or other business terms with any employees or representatives of our competitors. If you are not careful, you could find that you have violated antitrust and competition laws if you discuss or make an agreement with a competitor regarding:

- Prices or pricing strategy;
- Discounts;
- Terms of our customer relationships;
- Sales policies;
- Marketing plans;
- Customer selection;

- Allocating customers or market areas; or
- Contract terms and contracting strategies.

Agreements with competitors do not need to be written in order to violate applicable antitrust and competition laws. Informal, verbal, or implicit understandings, i.e., knowing winks, are also violations. Antitrust violations may be prosecuted criminally as felonies and can result in severe penalties for Creation and any associate or other person who participates in a violation.

13. Fair Procurement

We engage in open and fair procurement activities regardless of nationality or the size of the transaction. Suppliers are selected on a competitive basis based on total value, which includes quality, suitability, performance, service, technology, and price. We strive toward establishing mutually beneficial relationships with our suppliers based on close cooperation and open communication. Terms and conditions defining our relationship with suppliers are communicated early in the supplier selection process. Any agreements to such terms and conditions, or any acceptable modifications, are reached before work begins. Certain government procurement rules related to ethics and business conduct are flowed down to subcontractors. You are expected to know and comply with all government procurement rules applicable to our business.

Our procurement decisions are made on a competitive basis based on total value, which includes quality, suitability, performance, service, technology, and price. Proper procurement conduct includes:

- Using established corporate-wide or regional supply (leveraged) agreements whenever possible;
- Obtaining competitive bids when leveraged agreements do not exist;
- Confirming the financial and legal status of the supplier;
- Verifying quality and service claims on a regular basis;
- Making sure that purchase agreements clearly state the services or products to be provided, the basis for earning payment and the applicable rate or fee;
- Verifying that invoices clearly and fairly represent goods and services provided; and
- Avoiding reciprocal agreements or exchange of favors.

The fee or price paid for goods and services by Creation must represent the value of the goods or services provided. Payments can only be made to the person or the firm that actually provides the goods or services and must be made in the supplier's home country, where it does business, or where the goods were sold or services provided, unless approval is obtained from our Legal



department. Our company will not knowingly use suppliers who participate in the following activities:

- Supplying unsafe products or services;
- Violating laws or regulations;
- Using child labor or forced labor; or
- Using physical punishment to discipline employees, even if it is allowed by local law.

Selection and Use of Third Parties

We believe in doing business with third parties that embrace and demonstrate high principles of ethical business behavior. We rely on suppliers, contractors, and consultants to help us accomplish our goals. They are part of the Creation team and should be treated according to our values. To create an environment where our suppliers, contractors, and consultants have an incentive to work with Creation, they must be confident that they will be treated in an ethical manner. We offer fair opportunities for prospective third parties to compete for our business. The manner in which we select our suppliers and the character of the suppliers we select reflect on the way we conduct business.

14. Obtain Competitive Information Fairly

Gathering information about our competitors often called competitive intelligence is a legitimate business practice. Doing so helps us stay competitive in the marketplace; however, we must never use any illegal or unethical means to get information about other companies. Legitimate sources of competitive information include publicly available information such as news accounts, industry surveys, competitors' displays at conferences and trade shows, and information publicly available on the Internet. You may also gain competitive information appropriately from customers and suppliers (unless they are prohibited from sharing the information) and by obtaining a license to use the information or actually purchasing the ownership of the information. When working with consultants, vendors, and other partners, ensure that they understand and follow Creation policy on gathering competitive information.

15. Workplace Safety and Health

Our company strives to provide a safe and healthy workplace for employees, customers and visitors to its premises. All leaders have responsibility for ensuring proper safety and health conditions for their employees. Management is committed to maintaining industry standards in all areas of employee safety and health, including industrial hygiene, ergonomics and safety. To support this commitment, employees are responsible for observing all safety and health rules, practices and laws that apply to their jobs, and for taking precautions necessary to protect themselves, their co-workers



and visitors. Employees are also responsible for immediately reporting accidents, injuries, occupational illnesses and unsafe practices or conditions to their leader.

16. Discrimination & Harassment Prevention

Each of us is responsible for creating a culture of trust and respect that promotes a positive work environment. This means treating one another with fairness and courtesy in all of our interactions in the workplace. We are committed to the principles of equal employment opportunity, inclusion and respect. We prohibit discrimination in employment, employment-related decisions or in business dealings on the basis of an individual's race, color, ancestry, age, sex, sexual orientation, religion, disability, ethnicity, national origin, veteran status, marital status, pregnancy or any other status protected by law or local policy. We should provide an environment free of discrimination to our associates, customers, members and suppliers.

Harassment is conduct which inappropriately or unreasonably interferes with work performance, diminishes the dignity of any person or creates an intimidating, hostile or otherwise offensive work environment based on an individual's legally protected status. Examples include:

- Sexual advances, requests for sexual favors, sexually explicit language, off-color jokes, remarks about a person's body or sexual activities;
- Intimidating acts, such as bullying or threatening;
- Providing unequal opportunity based on disability or ethnicity; and
- Any other conduct that shows hostility toward, disrespect for or mistreatment of an individual based on the individual's legally protected status.

Harassing conduct in the workplace, is prohibited regardless of whether it is welcome or unwelcome and regardless of whether the individuals involved are of the same or different sex, sexual orientation, race or other status. Creation prohibits retaliation and will not terminate, demote or otherwise discriminate against associates for reporting concerns.

17. Workplace Violence

To preserve employee safety and security, weapons, firearms, ammunition, explosives and incendiary devices are forbidden on our company premises or in our company vehicles. In addition, Creation will not tolerate acts or threats of violence, including verbal or physical threats, intimidation, harassment and/or coercion. Examples of such conduct include harassing or threatening phone calls, email or written communication directed towards an employee or his or her friends/family members; stalking; and the destruction of personal and/or company assets. Behavior that threatens the safety of people or property, or has the potential to become violent, should be immediately reported to your leader, Security, People & Culture, or the Creation Ethics Hotline.



Human Rights & Fair Labor

We are committed to upholding fundamental human rights and believe that all human beings around the world should be treated with dignity, fairness, and respect. We demand that our suppliers and direct contractors demonstrate a serious commitment to the health and safety of their workers and operate in compliance with human rights laws. We seek to ensure that our products being free of conflict minerals.

We are committed to following all applicable wage and hour laws and regulations. Anyone paid based on hours worked must report and record all time worked accurately in accordance with established local procedure.

Equal Opportunity

Having a diverse workforce—made up of team members who bring a wide variety of skills, abilities, experiences and perspectives—is essential to our success. We are committed to the principles of equal employment opportunity, inclusion and respect. All employment-related decisions must be based on company needs, job requirements and individual qualifications. Always take full advantage of what our team members have to offer; listen and be inclusive. We do not tolerate discrimination against anyone—team members, customers, business partners or other stakeholders—on the basis of race, color, religion, national origin, sex (including pregnancy), age, disability, HIV status, sexual orientation, gender identity, marital status, past or present military service or any other status protected by the laws or regulations in the locations where we operate. We comply with laws regarding employment of immigrants and noncitizens and provide equal employment opportunity to everyone who is legally authorized to work in the applicable country. We provide reasonable accommodations to individuals with disabilities and remove any artificial barriers to success.

Diversity and Inclusion

Creation believes diversity and inclusivity make our teams and Creation better. We believe that we best serve and enrich our own culture through the diverse skills, experiences, and backgrounds that each of us brings to the company. This is why Creation maintains a safe and inclusive work environment where all dimensions of difference are valued and respected. We want everyone to feel welcome and able to be their authentic self to create value and drive growth.

Human Trafficking and Child Labor

Creation and its business partners do not engage in or condone the forced or coerced trafficking of any persons or the use of child labor. [Link to Creation Policy](#)

18. Substance Abuse/Drug and Alcohol-Free Workplace

Creation strives to maintain a workplace that is free from illegal use, possession, sale, or distribution of alcohol or controlled substances. Legal or illegal substances shall not be used in a manner that impairs a person's performance of assigned tasks.



19. Social Responsibility and Environmental Stewardship

We pride ourselves on being a company that operates with integrity, makes good choices, and does the right thing in every aspect of our business. We are committed to conducting business in a socially and environmentally responsible manner and strive to improve our performance to benefit our employees, customers, communities, shareholders, and the environment. We seek to align our social and environmental efforts with our business goals and continue to develop both qualitative and quantitative metrics to assess our progress. Employees whose work affects environmental compliance must be completely familiar with the permits, laws, and regulations that apply to their work.

20. Political Activity and Lobbying

Personal Political Activity

Creation encourages personal participation in the political process in a manner consistent with all relevant laws and Company guidelines. You may support the political process through personal contributions or by volunteering your personal time to the candidates or organizations of your choice but may not make or commit to political contributions on behalf of Creation. These activities, however, must not be conducted on Company time or involve the use of any Company resources such as telephones, computers, or supplies. If you express a personal view in a public forum (such as a letter to the newspaper), do not use Creation letterhead, company e-mail, or reference your business address or title. In addition, the following rules apply:

- The Company will not reimburse employees for personal political activity.
- Do not use the Company's reputation or assets, including your time at work, to further your own political activities or interests.
- If you plan to seek or accept a public office, you must obtain prior approval from the Company's General Counsel.

Company Political Contributions

No illegal political contribution of Company funds is to be made, directly or indirectly, to any government official, political party official, election committee or candidate for political office in any jurisdiction. Given the strict requirements of anti-corruption laws, any political contributions made by the Company where permitted by law must be specifically approved by the Company's General Counsel.

Lobbying

While lobbying government officials or agencies is permitted in certain jurisdictions, such as the United States, this activity is strictly regulated and must always avoid the perception of attempting



to influence a customer or potential customer. Any lobbying activities must be specifically approved by the Company's General Counsel.

21. Charitable Contributions

We support community development throughout the world. Creation employees may contribute to these efforts or may choose to contribute to organizations of their own choice. However, as with political activities, you may not use company resources to personally support charitable or other non-profit institutions not specifically sanctioned or supported by our company. You should consult the legal department or the Helpline if you have questions about permissible use of Company resources.

22. Truth in Advertising/Marketing

It is our responsibility to accurately represent Creation and our products in our marketing, advertising and sales materials. Deliberately misleading messages, omissions of important facts or false claims about our products, individuals, competitors or their products, services, or employees are inconsistent with our values. Sometimes it is necessary to make comparisons between our products and our competitors. When we do, we will make factual and accurate statements that can be easily verified or reasonably relied upon.

23. Communicating with External Parties

Creation employees are not authorized to speak with the media, investors, and analysts on behalf of our company unless authorized by our Media Relations Department. Unless authorized, do not give the impression that you are speaking on behalf of Creation in any communication that may become public. This includes posts to online forums, social media sites, blogs, chat rooms, and bulletin boards. This policy also applies to comments to journalists about specific matters that relate to our businesses, as well as letters to the editor and endorsements of products or services.

Government Request & Subpoenas

Employees should immediately contact their leader and Creation's Legal Team if they are contacted by law enforcement or other government officials with respect to their duties in most circumstances. However, employees are not required to disclose to Creation that any governmental or regulatory entity has contacted the associate regarding possible violation of any federal, state, or local law, rule, or regulation; do not need the prior authorization of Creation to disclose to any governmental or regulatory entity information regarding possible violation of any federal, state, or local law, rule, or regulation; and do not need to disclose to Creation that the associate has made such a disclosure.

Any information you provide to law enforcement or government officials must be completely honest and truthful. If you receive a subpoena related to Creation or your work, immediately contact the Creation Legal team. If you become aware of pending, imminent or contemplated litigation or a government examination or investigation, you must immediately contact the Legal



Department. You must also save all records and documents that may be relevant to the subpoena, litigation or investigation, including any records that may otherwise be automatically destroyed or erased (such as e-mail and voice mail messages)

24. Data Privacy

Privacy Laws

Protecting the privacy and security of personal information is a growing global concern. Many countries are enacting or strengthening privacy laws that govern the use of personal information and holding violators accountable.

Customer or Third Party

Creation respects the privacy of all its employees, business partners and consumers. We must handle personal data responsibly and in compliance with all applicable privacy laws and company policies (including our records retention requirements). Personal data is information that can directly or indirectly identify an individual, such as name, contact information, and health-related information. Employees who handle the personal data of others must:

- Act in accordance with applicable law;
- Act in accordance with any relevant contractual obligations;
- Collect, use and process such information only for legitimate business purposes;
- Limit access to the information to those who have a legitimate business purpose for seeing the information; and
- Take care to prevent unauthorized disclosure.

Employee Information

Creation respects the confidentiality of the personal information of employees. This includes employee medical and personnel records. Access to personal information is only authorized when there is a legitimate and lawful reason, and access is only granted to appropriate personnel. Requests for confidential employee information from anyone outside our company under any circumstances must be approved in accordance with our policies. It is important to remember, however, that employees should have no expectation of privacy with regard to normal course workplace communication or any personal property brought onto Creation premises or used for Creation business.



25. Protection of Intellectual Property & Confidential Information

Confidential Information

In carrying out Creation business, employees, officers and directors often learn confidential or proprietary information about our company, its customers, prospective customers, or other third parties. Employees, officers and directors must maintain the confidentiality of all information so entrusted to them, except when disclosure is authorized or legally mandated. Confidential or proprietary information includes, among other things, any non-public information concerning Creation, including its businesses, financial performance, results or prospects, and any nonpublic information provided by a third party with the expectation that the information will be kept confidential and used solely for the business purpose for which it was conveyed.

Intellectual Property & Protecting IP

Our intellectual property is among our most valuable assets. Intellectual property refers to creations of the human mind that are protected by various national laws and international treaties. Intellectual property includes copyrights, patents, trademarks, trade secrets, design rights, logos, expertise, and other intangible industrial or commercial property. We must protect and, when appropriate, enforce our intellectual property rights. We also respect the intellectual property belonging to third parties. It is our policy to not knowingly infringe upon the intellectual property rights of others.

26. Protection of Company Assets & Resources

Creation protects our company assets so we can better serve our guests and maintain value for our stakeholders. Creation's assets—whether they are merchandise, vendor samples, corporate credit cards, cash or information—are meant to be used for the benefit of the Company. These assets are not for personal gain or for the benefit of others outside of Creation. It is your responsibility to use reasonable efforts to keep Creation's assets safe from loss, theft, damage, inappropriate use or other forms of fraud.

If you suspect theft in the workplace, or if you become aware of misuse of Company assets, report it immediately.

27. Records Management

Our records are our corporate memory, providing evidence of actions and decisions and containing data and information critical to the continuity of our business. Records consist of all forms of information created or received by Creation, whether originals or copies, regardless of media. Examples of company records include paper documents, e-mail, electronic files stored on hard drive, disk or any other electronic or wireless medium (CD, Web drives, USB data storage devices, etc.) that contains information about our company or our business activities.



All records are the property of Creation and should be retained in accordance with our Records Retention Policy. We are responsible for properly labeling and carefully handling confidential, sensitive, and proprietary information and securing it when not in use. We do not destroy official company documents or records before the retention time expires but do destroy documents when they no longer have useful business purpose. Refer to the Records Retention Schedule as implemented in your department for more specific retention and destruction guidelines.

if employees have questions about the record-keeping requirements that apply to their jobs, please ask your leader.

28. Proper Use and Protection of Electronic Communications.

Creation's information technology and communications systems are vital to enable us to conduct our business and reach out to our consumers. If you have access to our information systems and computer networks, you are responsible for using the highest standards of behavior in all of your usage and communications. When you access our networks from remote locations (for example, at home or from other non-company locations), you are subject to the same standards of use as are employees who access our networks while on company premises. The data transmitted, received and stored by or within those systems, such as telephones, personal computers, data storage units, email, or pagers, are valuable assets that we must protect to ensure that these resources are accessible for business purposes, that our company's reputation is protected, and that we minimize the potential for legal risk. Limited personal use may be acceptable if it is authorized by your work location and does not interfere with your job responsibilities.

Safeguard the following:

- **Passwords:** You are responsible for your corporate credentials. Passwords must meet corporate standards and must be kept private, and therefore not shared, coded into programs or written down. IT Security must be informed in the event that a password is suspected of having been compromised. Do not share your passwords with anyone at any time.
- **Mobile Security:** You must protect Creation assets. It is extremely important that you treat your mobile device like any other Corporate IT device. Mobile device security can be breached and infected just like a PC, laptop, etc. Never click links, download files, or execute programs on your mobile device unless it is required, and you are certain of the source and legitimacy of the content. Always protect such items from loss, theft or damage.
- **Acceptable Usage:** It is not permitted to use Creation information technology and communications systems (including email, instant messaging, the Internet or intranet) for activities that are harmful, unlawful, unethical, immoral or otherwise contrary to the Code.

Examples of Inappropriate Computer Use:

- Never use electronic media to initiate, save, or send items that are hostile, harassing, offensive, threatening, or otherwise inappropriate.



- Do not use electronic media to initiate, save, or send chain letters or other widespread non-business distributions.
- Do not use electronic media to initiate or participate in any malicious, unauthorized, or fraudulent use of company resources.
- Think before you use Creation's electronic media for non-business purposes and comply with the policies of your business unit.

Remember: The unauthorized transmission of company data, access to inappropriate internet sites, and the transmission of inappropriate e-mails are examples of misuse of technology.

We are dedicated to quality and take personal pride in all the products and services we provide. Our intense, acute focus on the needs of our customers continuously drives us to improve. Our continued success depends on exceeding the expectations of our customers and standing behind everything we do.

Chairman and Chief Executive Officer

Stephen DeFalco

stephen.defalco@creationtech.com

Chief Human Resources Officer

Liam Weston

liam.weston@creationtech.com

General Counsel and Head of Acquisitions

James W. Hackett, Jr.

james.hackett@creationtech.com

Confidential Reporting Site

[Whistleblower Policy](#)

<http://creationtech.ethicspoint.com/>