

Cretex conducts business honestly and ethically wherever operations are maintained and expects all employees and third-party partners/suppliers/contractors to do the same. Cretex strives to improve the quality of services, products, and operations, and will maintain a reputation for honesty, fairness, respect, responsibility, integrity, trust, and sound business judgment. Illegal, dishonest, fraudulent activity will not be tolerated. Reportable activities include violations of any provision of federal, state, local or country law. Specific Policies are outlined in this Code of Conduct Document.

The Policies are reviewed on an annual basis and training is provided in appropriate intervals, no less than every other year, to employees.

A Cretex executive team representative will immediately initiate investigation of any activity, suspected and/or reported and take prompt action. This may include engaging with an outside third party. Anyone reporting suspicious activity truthfully and/or participating in an investigation of any concerns under this Code of Conduct will not be retaliated against in any form.

Ethics Hotline

Employees who believe Cretex or any employee is not meeting this expectation while working with or representing Cretex should report it to Human Resources, their department director, general manager, or president immediately to facilitate appropriate actions to address such situations. Employees may also report anonymously through the Cretex Ethics Hotline at 888-328-4546 ext. 8114. Any employee who does not wish to provide their contact information should be as detailed about the complaint as possible for proper follow-up.

Labor & Human Rights, Employment

Cretex strives to conduct its business in a manner that demonstrates a respect for globally recognized human rights and the dignity of all people.

Anti-Slavery, Child Labor, Forced Labor, Human Trafficking

We do not tolerate forced labor of any kind in our businesses and across our supply chain. Our work environments are free from human trafficking, slavery, unlawful child labor, coerced, bonded, indentured, or forced prison labor. All employees are free to leave or terminate at will without fear of physical, psychological, sexual or verbal abuse. Furthermore, Cretex will not knowingly engage with any third party, i.e., suppliers, subcontractors, agencies or service providers who act in any manner contrary to this belief or against the law.

Non-Discrimination, Inclusivity & Diversity

Our commitment to a diverse and inclusive environment as well as standing firm as a Company unquestionably following Equal Employment Opportunity rules, values, laws and regulations is demonstrated by procedures that ensure employment decisions, including hiring, pay, and promotions, will be made without regard to gender, sex, sexual orientation, gender identity and/or expression, age, color, national origin, citizenship status, physical or mental disability, race, religion, creed, genetic information, marital status, familial status, status with regard to public assistance, veteran status, or any other characteristic protected by country, federal, state or local law.

Anti-Harassment

Cretex has Policies and Procedures in place that address how situations of harassment and other forms of offensive behavior are resolved. All employees are trained annually.

Employee Wellbeing

Cretex invests in our employees' personal and professional growth. Our physical and emotional wellbeing affect the health of our work and is fundamental to our Company's founding values. Employee wellbeing means, in part, that we each feel valued as a contributor and have a sense of belonging at Cretex. It means that we get timely and honest feedback about our work and our professional development. Our Company maintains high standards of fairness and respect, supporting individuals through a wide variety of services.

Working Hours, Benefits and Wages

All Cretex operating companies have implemented working hours that are commensurate with the needs of the business, ensure compliance with applicable laws and regulations, and rigorously follow wage and hour laws. Policies and procedures are in place to monitor our compliance.

As an employer of choice, Cretex believes in offering a comprehensive benefit package to all employees, contributing to their personal and financial well-being.

Workplace Environmental, Health, and Safety

The health and safety of all employees and protection of our environment is a top priority in our operating companies. We must constantly strive to prevent workplace injuries, illnesses, and environmental damage by:

- following all applicable environmental, health, and safety laws and regulations
- complying with Cretex safety policies and procedures
- reporting, tracking, and developing corrective and preventive actions
- conducting ourselves in a safe and responsible manner
- taking all reasonable precautions when handling hazardous or unsafe materials, and when operating machinery and equipment; and
- working to continuously reduce workplace hazards and environmental impacts.

Right to Privacy

We respect and protect the confidentiality of all prospective, current, or former employees' personal information.

Personal information is defined as any information that can be used, alone or in combination with other information, to identify a specific individual. It includes such information as a person's name, address, email address, date of birth, driver's license number, financial account numbers, passport, U.S. Social Security number or other government identification number, and other identifiers.

Cretex employees who handle such information know and follow the standards for access, use, transmission, storage and disposal of employee personal information. In addition, access to this information is limited to **authorized** persons with a legitimate business need. Anyone who believes their confidential information has been inadvertently accessed or distributed, whether in email, social media, or hard copy, should contact the Cretex Corporate HR Department.

Cybersecurity

Employees must maintain the confidentiality and integrity of company information and data by taking appropriate measures to safeguard against unauthorized access, use, or disclosure. This includes using strong passwords, regularly updating software and security patches, and promptly reporting any suspected security incidents or breaches to the appropriate company personnel.

Respectful Communication and Social Media

All employees must communicate respectfully and professionally on social media, both when representing the company and when expressing personal opinions. Offensive or derogatory comments, posts, or messages that may harm the company's reputation, other employees, or customers will not be tolerated.

Environmental Sustainability

Environmental Sustainability Statement

Cretex is committed to responsible environmental practices in support of our business objectives and compliance with applicable laws and regulations. We believe the benefits of reducing our environmental impact contributes favorably to society and our business operations by embracing these priorities:

- *Conservation of energy and water*
- *Reduction and recycling of waste*
- *Reduction of carbon footprint*
- *Sustainable supply chain practices*
- *Environmental community service projects*

The engagement of our people through our Operational Excellence culture and tools will give us the foundation to continuously measure and improve our initiatives.

General Governance

Anti-Corruption

Corruption undermines our integrity, reputation, founding ideals and shared values. We will not permit corrupt acts as a means to further our business. They not only interfere with our long-term business vision but also put our customers at risk. Corruption is defined as any form of dishonesty or fraudulent behavior wherein someone uses their position of power to benefit themselves at the expense of others.

Anti-Bribery and Anti-Extortion

Cretex will never offer or provide any form of bribe, illegal payment, or kickback. We do not offer

- or provide items of value to improperly induce or reward a customer for recommending, using, ordering, or purchasing a product or service,
- or pay for an unfair advantage in the marketplace.

No representative of Cretex will use actual or threatened force, violence, or intimidation to gain money, property, or a commercial advantage from any individual or entity.

Furthermore, Cretex will not hire any third party, i.e., suppliers, subcontractors, agencies, or service providers to conduct business on our behalf where we know that illegal payments to decision makers are made or have been made.

Gifts for Government Officials

Cretex will never make inappropriate attempts to influence a government decision-maker. We must avoid giving any kind of illegal gift to a government official or employee of a government-owned enterprise. The standards for nominal gifts and entertainment can vary by locality. Before considering any gift to a government official, approval must be obtained by a Cretex Executive Team member.

Financial Records Accuracy & Disclosure

Cretex is committed to maintain ethical and honest accounting practices at all times. This includes all aspects of our financial activities: how we spend, transact, report, document, and comply with local, domestic and global financial requirements.

Accurate Accounting

Cretex has processes in place to ensure our company's financial information is accurate and complete. The records we create as part of our daily responsibilities have a significant impact on the financial information our Company discloses and the decisions we make.

Falsification of Records

Our honesty and integrity are reflected in the accuracy of our records. We will at all times accurately disclose to regulatory agencies, shareholders, board members and auditing agencies all funds and assets, and record all transactions.

Records Management

Our records and accounts are complete and not misleading, and the reports produced from those records are kept and presented in accordance with all applicable laws and relevant accounting standards. We retain all records that are held for legal purposes and/or in accordance to our internal records retention policy.

Fair Competition and Antitrust Laws

Competition laws (also called antitrust laws) preserve a level playing field for all businesses and allow Cretex to make a fair profit. They promote open and fair competition and prohibit agreements or practices that unfairly restrain trade. These laws ensure that markets for goods and services operate competitively and efficiently for purchasers and sellers.

Violations of these laws do not require an actual or written agreement between competitors. These can be based upon conduct of individuals such as sharing with a competitor our pricing information or other confidential strategies for sales terms and conditions. Cretex has policies in place to ensure they understand they cannot share confidential information with a competitor.

Conflicts of Interest

A conflicts of interest may occur when our own personal activities or interests — or those of someone close to us — conflict with the best interest of Cretex. All employees are expected to avoid any perceived or actual conflict of interest. While this concept seems simple, the wide varieties of situations that may create a conflict of interest make this complex. Gifts and business courtesies, outside opportunities, and personal relationships are just a few of the many situations in which a conflict of interest may occur. Policies are in place to communicate outside opportunities, such as employment or other activities, with another company while working for Cretex.

Gifts and Business Courtesies

Just as gifts and business courtesies can undermine the integrity of our relationships with customers, they can create a real or perceived conflict of interest in our interactions with other third parties. While there may be appropriate business reasons for accepting business courtesies, such as meals and entertainment, we must use sound judgment to avoid a real or perceived conflict of interest. We may never solicit gifts, entertainment, or recreation for personal use. These items may only be accepted under limited circumstances and approved by the employee's manager, or when in doubt, a Cretex Executive Team member.

Intellectual Property

We may protect our intellectual property by obtaining patent, trademark, or trade secret protection, or by taking precautions to prevent inappropriate disclosure, use, or loss of such information. We enforce our rights to these assets. Likewise, we respect the intellectual property rights of others. Intellectual property (IP) includes patents, trade secrets, trademarks, copyrights, design rights, trade dress, logos, know how, photos/videos, individuals' names and likenesses, and other intangible industrial or commercial property.

Export Controls and Economic Sanctions

As a US based company, Cretex knows and follows U.S. import and export laws and regulations. We must also know and follow the laws and regulations of the countries in which we export or import products, which can be very complex, along with our own Company policies.

Boycotts and Sanctioned Countries

U.S. law prohibits cooperation with certain boycotts imposed by some countries against others and requires that any request in aid or support of such boycotts be reported to the U.S. government. We do not participate in prohibited boycotts. Also prohibited under U.S. law is trade with certain sanctioned countries.

Anyone at Cretex who receives a request to cooperate with a prohibited boycott or trade with a sanctioned country, immediately reports this request to the Chief Financial Officer of Cretex.

Conflict Minerals

In alignment with our Human Rights values and customer expectations to support compliance to the Dodd-Frank Act proactively identifying and making every effort to eliminate the use of any conflict minerals sourced from mines that finance the operations of the Democratic Republic of Congo and adjoining countries, Cretex seeks compliance statements and/or information from a select supplier base as applicable.