



# Code of Business Conduct and Ethics

02/18/2021

Human Resources

## PURPOSE AND SCOPE

Creative Foam Corporation ("Creative Foam" or the "Corporation") has adopted this Code of Business Conduct and Ethics (the "Code"), in connection with good standards of corporate governance. The provisions of this Code apply to all employees, officers, and directors of the Corporation, including the Corporation's principal executive officer, financial officer, accounting officer or controller, or persons performing similar functions (collectively, "Employees").

The Code is designed to deter wrongdoing and to promote, honest and ethical conduct, avoidance of conflicts of interests, full, fair, accurate, timely and understandable disclosure in SEC filings, compliance with applicable governmental laws, rules and regulations, prompt internal reporting of violations of the Code and accountability for adherence to the Code.

## POLICY

Each Employee is expected to adhere to a high standard of ethical conduct and to conduct duties on behalf of the Corporation with uncompromising honesty and integrity. Each Employee is expected to be honest and ethical in dealing with all Corporation employees, customers, vendors and third parties.

### **Conflicts of Interest**

Each Employee is expected to avoid engaging in activities that conflict with, or are reasonably likely to conflict with, the best interests of the Corporation. An Employee must never use or attempt to use his or her position with the Corporation to obtain any improper benefit for himself or herself, for his or her family members, or for any other person. In addition, Employees should not have any position with or substantial interest in, any business enterprise for profit, the existence of which would be expected to conflict with their responsibilities to the Corporation.

This provision applies not only to each Employee but also to immediate family members of each Employee, and any trust or entity over which the employee has control. An "immediate family member" includes parent, child, spouse, domestic partner, brother, sister, parent-in-law, grandparent, and grandchild.

If an Employee believes a conflict of interest exists or may arise, he or she should immediately disclose the nature and extent of the conflict, or potential conflict, to his or her supervisor, who, along with appropriate officials of the Corporation, will evaluate the conflict and take the appropriate action, if any, to ensure that the Corporation's interests are protected. For the avoidance of doubt, any transaction between the Corporation and another party on terms that are reasonably believed to be at least as favorable as the terms that the Corporation otherwise could have obtained from an unrelated third party shall not create a conflict of interest or cause a violation of this Code, provided that: (i) with respect to the Board and any member of senior management, the disinterested members of the Board were given prior notice of and approved such transaction; and (ii) with respect to all other

Employees not included in the immediately preceding clause, the Corporation's General Counsel was given prior notice of such transaction.

### **Integrity of Records and Financial Reporting**

The Corporation applies the highest ethical standards in its financial and non-financial public reporting and follows all applicable standards and rules regarding reporting. Employees are responsible for full, fair, accurate, timely and understandable disclosure in reports and documents prepared by the Corporation. As such each Employee has the responsibility to be truthful and accurate in his or her accounting and reporting practices and to immediately report to appropriate Corporation personnel any information that he or she becomes aware of that affects disclosures made by the Corporation. This includes any violations of law or this Code that may warrant disclosure to appropriate authorities. If an Employee discovers an error in any information previously disclosed, such discovery should immediately be brought to the attention of the Board of Directors and, if applicable, the Corporation's independent auditors or legal advisors.

### **Compliance with Laws, Rules and Regulations**

It is the Corporation's policy to comply with all applicable federal or state laws, rules, and regulations, the laws of any other jurisdictions in which we conduct business and the rules and regulations of self-regulatory organizations of which the Corporation is a member. Obeying the law, both in letter and spirit, is the foundation on which this Corporation's ethical standards are built. It is the responsibility of each Employee to respect and adhere to such applicable laws, rules and regulations. When an Employee is uncertain regarding the interpretation and/or application of any law or regulation, he or she should consult with a supervisor, an executive officer, or the legal department.

### **Counterfeit Parts**

The Corporation have implemented a product development processes and supplier quality guidelines which include activities oriented to detect and minimize the risk of introducing counterfeit parts or materials into deliverable products.

## **HUMAN RIGHTS AND WORKING CONIDITIONS**

The Corporation has policies and management systems in place to support compliance with laws, regulations, and industry standards. The Corporation works to reduce the risk of potential human rights violations in their operations and through their business relationships by identifying risks and remediating any non-conformance in a timely manner. This includes all workers: full and part time employees, temporary, migrant, student, contract, and any other type of worker.

### **Child Labor**

The Corporation complies with all regulatory requirements regarding child labor. The Corporation may utilize internships, co-op programs and other apprenticeship and student learning programs, which comply with all applicable laws and regulations.

### **Wages and Benefits**

The Corporation complies with all applicable regulations regarding employee overtime, including compensating workers for overtime in accordance with applicable local laws and regulations, including

those relating to minimum wages, and legally mandated benefits. Employees are regularly provided payroll records that include adequate information to verify compensation for work performed for each pay period. The Corporation's use of temporary, outsourced labor, as necessary, is also in compliance with all applicable laws and regulations.

### **Forced Labor**

All work should be voluntary on the part of the employee. Companies and agents should not hold, destroy, conceal, confiscate, or deny access to employee identity documents unless required by applicable law. Companies should ensure that workers are not required to pay recruitment fees or related fees of any type for employment. Companies should ensure all workers receive a written contract or ensure they understand the terms of employment in a language well understood by the worker.

Human Trafficking: Forced, bonded (including debt bondage) or indentured labor/labor, involuntary prison labor/labor, and slavery or trafficking of persons should not be used by any company. This includes, but is not limited to transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, deception, abduction on or fraud for labor/ labor or services.

The Corporation complies with all applicable laws regulating working hours. When overtime is required, the use of voluntary overtime is first considered before any mandatory overtime is scheduled.

### **Health & Safety**

Safety is one of the Corporation's core operating values that is used to prioritize our tasks, along with quality and efficiency. We are committed to providing a safe and healthy working environment to prevent work-related injuries and illnesses by doing the following:

1. Each member of our TEAM will hold themselves and their co-workers accountable to work safely.
2. We will meet our legal requirements and other compliance obligations.
3. We will work to eliminate hazards and reduce our risks.
4. We will set safety performance objectives, measure the results, and work to continuously improve our management systems.

We will consult and collaborate with employees and/or their representatives on safety matters

### **Harassment**

The Corporation is committed to providing and maintaining a work environment that is free of harassment and discrimination based on race, color, religion, national origin, ethnicity, sex (see the definition of sexual harassment below), age, disability or handicap, marital status, citizenship, height, weight, or any other characteristic protected by law. Additional information is summarized in the Corporation's Anti-Harassment Policy.

### **Non-Discrimination**

The Corporation is an equal opportunity employer and is committed to a policy of compliance with all federal and state civil rights laws and regulations. To provide equal employment and advancement opportunities to all individuals, employment decisions at the Corporation are based on merit, qualifications, and abilities. This is further outlined in the Corporation's Equal Employment Policy.

#### **REPORTING ANY ILLEGAL OR UNETHICAL BEHAVIOR OR ACCOUNTING OR AUDITING CONCERNS**

Compliance with this Code is important to the Corporation and depends on each Employee. If you observe or become aware of illegal or unethical behavior, violations of the Code or accounting or auditing concerns, you should promptly report the behavior to the Audit Committee of the Board. It is the policy of the Corporation not to retaliate against any person for the act of reporting, in good faith, a suspected ethical or legal violation or accounting or auditing concerns. Any attempt to take such adverse action is a violation of this Code and will result in significant discipline, including possible termination. To the extent the matter has been reported and remains unresolved you should report the matter to the Corporation's legal advisors.

#### **Enforcement**

The Corporation's Audit Committee -- in coordination with senior management, legal counsel and, where appropriate, the Board -- is responsible for overseeing the fair, prompt and consistent enforcement of this Code, including the investigation of possible violations and the undertaking of remedial actions.

#### **Sanctions**

The Corporation has a long-standing commitment to conduct all business activities with the highest ethical standards. Accordingly, this Code is important to the Corporation and must be taken seriously. Violations of this Code will not be tolerated and will result in disciplinary action. Depending on the nature of the violation involved, violation of this Code may result in civil or criminal legal enforcement actions.

#### **Ethics Escalation Policy (whistle-blowing policy)**

Creative Foam Corporation is committed to ensuring that employees can speak up with confidence if they have any concerns or need to ask for help. If you suspect or observe anything that you think might be in contravention of this policy, you have an obligation to report it. You should raise your concerns with your supervisor or Top Management immediately. Creative Foam Corporation will not tolerate retaliation of any form against anyone for raising concerns or reporting what they genuinely believe to be improper, unethical or inappropriate behavior. All reports are treated confidentially.

#### **Anti-Bribery Policy**

All forms of bribery and corruption are prohibited. The Corporation does not tolerate any act of bribery or corruption. Any breach of this policy or local law could result in disciplinary action being taken and ultimately could result in dismissal.

#### **Waivers and Amendments**

This Code may be amended or modified by senior management of the Corporation. Waivers of this Code may only be granted by the Board or a committee of the Board with specific delegated authority.

APPROVAL

Author/Approver: David Hansen

Title: VP Human Resources



Signature:

Date: 3/15/2021