

INTRODUCTION

This Code of Business Conduct covers a wide range of business practices and procedures. It sets out basic principles to guide employees of Krayden and our vendors. All parties must conduct themselves accordingly and seek to avoid any appearance of improper behavior.

If a law conflicts with a policy in this Code, you must comply with the law. Also, if a local custom or policy conflicts with this Code, you must comply with the Code. If you have any questions about these conflicts, you should ask your supervisor how to handle the situation. You are responsible for understanding the legal and policy requirements that apply and reporting any suspected violations of law, this Code, or Company policy.

Those who violate the standards in this Code will be subject to disciplinary action, including possible dismissal. Furthermore, violations of this Code may also be violations of the law and may result in civil or criminal penalties for you, your supervisors and/or the Company. Any violation of this Code may be reported as defined in the Krayden Whistleblower Policy.

BUSINESS PRINCIPLES AND ETHICS

Compliance with Laws, Rules and Regulations Obeying the law, both in letter and in spirit, is the foundation on which this Company's ethical standards are built. You must respect and obey the laws, rules and regulations of the cities, states and countries in which we operate. Although you are not expected to know the details of each of these laws, rules and regulations, it is important to know enough to determine when to seek advice from supervisors, managers or other appropriate personnel.

Conflicts of Interest A "conflict of interest" exists when a person's private interest interferes in any way - or even appears to interfere - with the interests of the Company. A conflict situation can arise when you take actions or have interests that may make it difficult to perform your Company work objectively and effectively. Conflicts of interest may also arise when you, or a member of your family, receive improper personal benefits as a result of your position in the Company.

It is a conflict of interest for a Krayden, Inc. employee to work for a competitor, customer or supplier, or to supply confidential company information to a customer, supplier, or competitor. You should avoid any direct or indirect business connection with our customers, suppliers, or competitors, except as required on our behalf.

Conflicts of interest are prohibited as a matter of Company policy, except as approved by the President. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with your supervisor. Any employee who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor, manager or other appropriate person.

Insider Trading All non-public information about Krayden, Inc. or its customers should be considered confidential information. Employees who have access to confidential information about Krayden, Inc. or any other entity are not permitted to use or share that information for any other purpose except the



conduct of the Company's business. To use non-public information for personal financial benefit is not only unethical but also illegal.

Competition and Fair Dealing We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. You should endeavor to respect the rights of and deal fairly with our customers, suppliers, competitors and employees. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice.

You are not permitted to engage in price fixing, bid rigging, allocation of markets or customers, or similar illegal anti-competitive activities.

To maintain the Company's valuable reputation, your compliance with our quality processes and safety requirements is essential. All documented information must be handled in accordance with all applicable specifications and requirements.

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers. No gift or entertainment should ever be offered, given, provided or accepted by any Krayden, Inc. employee, family member of an employee, or agent unless it: (1) is not a cash gift, (2) is consistent with customary business practices, (3) is reasonable in value, (4) cannot be construed as a bribe or payoff and (5) does not violate any laws, regulations or applicable policies of the other party's organization. Please discuss with your supervisor any gifts or proposed gifts which you are not certain are appropriate.

Confidentiality and Proprietary Information You must maintain the confidentiality of proprietary information entrusted to you by the Company or its customers or suppliers, except when disclosure is authorized in writing by a manager or required by laws or regulations. Proprietary and confidential information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Proprietary and/or confidential information includes all non-public information that might be of use to competitors or harmful to the Company or its customers or suppliers if disclosed. It includes information that suppliers and customers have entrusted to us. The same obligations are extended to all information provided to the Company by customers, including purchasing information, specifications, and financial data. Proprietary and/or confidential information shall not be removed from Company premises without Management authorization. If you have a question about whether information is confidential or not, it is your responsibility to get management approval before disseminating that information. The obligation to preserve proprietary and/or confidential information continues even after employment ends. Unauthorized use or distribution of this information is a violation of Company policy. It could also be illegal and result in civil or criminal penalties.

Protection and Proper Use of Company Assets You must protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Company's profitability. All Company assets are to be used for legitimate Company purposes. Any suspected incident of fraud or theft should be immediately reported for investigation. Company assets should not be used for non-Company business.

Payments to Government Personnel The U.S. 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. Never give or authorize directly or indirectly any illegal payments to government officials of any country.

In addition, the U.S. government has a number of laws and regulations regarding business gratuities, which may be accepted by U.S. government personnel. The promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of these rules would not only violate Company policy but is also a civil or criminal offense. State and local governments, as well as foreign governments, often have similar rules.

Trade Issues From time to time, the United States, foreign governments and the United Nations have imposed boycotts and trading sanctions against various governments and regions, which must be obeyed. Advice regarding the current status of these matters must be obtained from a manager.

Reporting any Illegal or Unethical Behavior You are encouraged to talk to supervisors, managers or other appropriate personnel about observed behavior which you believe may be illegal or a violation of this Code of Conduct or Company policy or when in doubt about the best course of action in a particular situation. It is the Company's policy not to allow retaliation for reports made in good faith by employees of misconduct by others. You are expected to cooperate in internal investigations of misconduct.

HEALTH AND SAFETY

We recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production, and worker retention and morale. We strive to provide each employee with a safe and healthy work environment by following environmental, safety and health rules and practices and reporting accidents, injuries, and unsafe equipment, practices, or conditions. Violence and threatening behavior are not permitted.

You are expected to perform your Company related work in a safe manner, free of the influences of alcohol, illegal drugs or controlled substances. The use of illegal drugs in the workplace will not be tolerated.

Occupational Safety Worker potential for exposure to safety hazards are identified and assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Reasonable steps are taken

to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodations for nursing mothers.

Emergency Preparedness Potential emergency situations and events are identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

Occupational Injury and Illness Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate return of workers to work.

Industrial Hygiene Worker exposure to chemical, biological and physical agents is identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are eliminated or controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, workers are provided with and use appropriate, well-maintained, personal protective equipment.

Physically Demanding Work Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks is identified, evaluated and controlled.

Sanitation, Food, and Housing Workers are provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.

Health and Safety Communication We will provide workers with appropriate workplace health and safety information and training. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers are encouraged to raise safety concerns

ENVIRONMENTAL

We expect you to follow all applicable environmental laws and regulations. If you are uncertain about your responsibility or obligation, you should check with your supervisor for guidance.

As a distributor, Krayden policy is to provide certification to various compositional requirements upon request for specific items. Certification from the manufacturer will be provided to the customer. In the event that the customer demands that Krayden certify, such certification will be based entirely on corresponding manufacturer certifications. This includes requirements related to Conflict Minerals, REACH, RoHS, and other compositional certifications.

Our environmental standards are:

Environmental Permits and Reporting All required environmental permits, approvals, and registrations are obtained, maintained, and kept current and their operational and reporting requirements are followed.

Pollution Prevention and Resource Reduction Emissions and discharges of pollutants and generation of waste are minimized or eliminated at the source or by modifying processes, or by other means. The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is conserved by practices such as modifying production, maintenance, and facility processes, materials substitution, re-use, conservation, recycling, or other means.

Hazardous Substances Chemicals and other materials posing a hazard to humans or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling, or reuse and disposal.

Solid Waste We have a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

LABOR

We are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

The labor standards are:

Freely Chosen Employment Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company provided facilities. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

Young Workers Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.



Working Hours Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

Wages and Benefits Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

Humane Treatment There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

Non-Discrimination Participants should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

Freedom of Association In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives are able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

Revision Record

Revision Date	Approved By	Description of Change
2/14/2024	John King	Add reference to Whistleblower Policy in the Introduction section.