

# Code of Conduct

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Defining the standards of integrity, accountability, and ethical conduct that guide our actions and decisions.

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# A Message from Our President

## Built with Integrity: Why Your Work Matters

Over the years, Crown has built a strong reputation as a company grounded in integrity and purpose, and the impact of what we do is far-reaching and essential. Every day, our products play a critical role in moving, storing, and handling the goods people rely on — from everyday essentials to life-saving medications. That’s the power of what we build.

At Crown, we don’t just manufacture forklifts. We build trust. We build smart, dependable solutions. And we do it better because of the people who design, manufacture, and support our products. Your contributions are what make the difference.

Our products are **Built with Integrity** and so is our company. From the beginning, Crown has stood on a foundation of values shaped by our employees. Today, it is up to all of us to carry that legacy forward through our daily actions and decisions.

To support you in that journey, Crown is introducing an updated **Code of Conduct** — your guide to continuing to build with integrity. This Code of Conduct outlines the laws, policies, and expectations that apply to our work and offers practical advice for navigating real-world situations. It is an important tool to help you make informed, ethical decisions and will connect you to the appropriate resources and people if you need assistance.

Thank you for your dedication, your integrity, and your commitment to doing the right thing every day. It is a privilege to lead this company, and I am grateful for all we continue to achieve together.



**Jim Dicke III**  
President

# Connect with Our Values

Crown's values guide how we work and conduct business every day. They provide the foundation for the standards and expectations outlined in this Code of Conduct and help us make responsible decisions with honesty, integrity, and accountability.



# C

## Commitment

Demonstrate a commitment to the safety, innovation, and the success of our employees, our customers, and our company.



# R

## Respect

Foster an inclusive work environment that promotes honesty, integrity, and openness.



# O

## Opportunity

Create opportunities for personal and professional growth through self-development, career progression, and team collaboration.



# W

## Winning

Achieve business success with superior customer service, exceptional products, and a professional approach in all that we do.



# N

## Navigating

Inspire each other to support the company's vision and embrace our strategy to be our customers' first choice and a great place to work.

# Connect with Our Code

[Know the Code](#)

[Rise to the Challenge](#)

[Choose What's Right](#)

# Know the Code

At Crown, our actions not only deliver quality material handling solutions for our customers, but they also define who we are as an organization. This Code of Conduct (“Code”) is designed to serve as a practical guide to help you navigate questions and challenges related to ethical business conduct. Whether you are new to Crown or revisiting this resource for guidance, the Code is here to support your development, guide your decisions, and reinforce our shared commitment to integrity.

Since its founding in 1945, Crown has built a reputation for honesty and ethical business practices. This Code helps ensure that, together, we continue to meet and exceed those high standards.

Since its founding in 1945, Crown has built a reputation for honesty and ethical business practices.

**This Code helps us continue to build a culture of integrity by providing:**



An overview of the laws, regulations, and policies that guide our work



Approaches to address issues responsibly



Links to our policies and other critical resources



# Know the Code

## This Code is For All of Us

This Code applies to every employee, officer, and director of Crown Equipment Corporation and its network of affiliates, subsidiaries, and branches around the world (“Crown”) – regardless of role, title, or location. Across the organization, we must uphold the letter and spirit of the Code. We also require the businesses that we work with to uphold the same high level of integrity.

Because Crown operates globally, we must comply with the laws and regulations that apply wherever we do business. We also respect the cultures, customs, and ethical standards of the communities where we work.

If local laws are more restrictive than this Code, you must follow the local law. If any part of this Code appears to conflict with applicable law, always comply with the law and seek guidance if you are unsure how to proceed. In some situations, this Code sets a higher standard than local laws or business practices. You must follow the Code in these circumstances unless Crown Compliance & Ethics has granted an exception.



## We Take Compliance Seriously

Understanding this Code and putting it into practice every day is essential to protecting our employees, our company, and our reputation. We are all accountable for meeting the standards of the Code and continuing to create a culture where ethical behavior is expected and supported.

**Acknowledge your commitment.** To help reinforce our shared commitment, employees will periodically be asked to acknowledge that they have read, understand, and will follow this Code. New employees will complete this acknowledgement shortly after they begin employment. In some cases, consultants, agents, contractors, and other third parties who represent or perform work for Crown may also be asked to acknowledge the portions of the Code that apply to their work.

**Be accountable for your actions.** Failure to follow the Code or related policies may result in disciplinary action, up to and including termination of employment. In some cases, noncompliance may also expose both Crown and individuals to civil or criminal penalties.

Employees may also face disciplinary action if they:

- Fail to use reasonable care to identify or report misconduct.
- Withhold or misrepresent important information during an investigation.
- Direct, approve, or knowingly allow misconduct to occur.
- Retaliate against anyone who raises a concern or participates in an investigation in good faith.

By following the Code, speaking up with concerns, and supporting one another, we help protect our company, our colleagues, and the trust others place in Crown every day.

# Rise to the Challenge

Built with Integrity requires a shared commitment from all of us to do our part every day. Each employee plays a role in maintaining a respectful and ethical workplace.

## Integrity is everyone's responsibility. All employees must:

- Follow our Code, our company policies, and the laws applicable in the communities where we operate.
- Commit to continued learning through timely completion of required training.
- Understand and apply Crown's values in our daily work.
- Seek guidance when faced with uncertainty or conflict.
- Stay alert for misconduct and report suspected violations.

## Managers and executives have additional responsibilities to:

- Act as role models by demonstrating integrity through their actions.
- Promote awareness, understanding, and application of the Code.
- Foster an open and retaliation-free environment where employees feel comfortable speaking up.
- Respond to and report concerns promptly, including any actual or suspected misconduct.

# Choose What's Right

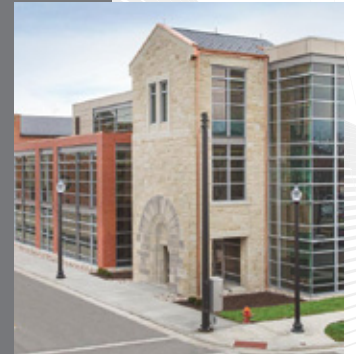
While this Code addresses many situations, it cannot cover every scenario.

## When faced with a difficult business decision, consider the following questions:

- Is it safe?
- Is it lawful and ethical?
- Does it align with our Code and values?
- Is it in the best interest of Crown and our customers?
- Is it respectful to others?
- Would I be comfortable if my decision was made public?

If the answer to all of these questions is yes, the decision is likely appropriate.

If you are unsure or answered no to any question, Speak Up right away and seek guidance before taking action.



# Connect with Each Other

[Stay Healthy and Safe](#)

[Show Respect](#)

## Stay Healthy and Safe

A successful day at Crown means that every employee returns home safely. Our commitment to health, safety, and security is fundamental to our business and cannot be compromised.

**Foster a culture of safety.** As a Crown employee, you must help to maintain a safe work environment by:

- Following all health and safety policies, procedures, and instructions relevant to your work. Never cut corners to save time.
- Completing all required safety training and using appropriate personal protective equipment when necessary. Never operate equipment or tools you haven't been trained and authorized to use.
- Reporting any work-related injuries or illnesses to your manager promptly.
- Reporting any workplace hazards, such as damaged equipment, unsafe conditions, or near misses, so they can be promptly addressed.

**Show up fit for work.** Crown prohibits the use, possession, sale, or distribution of illegal drugs or controlled substances. Alcohol cannot be consumed on company property or during working hours, except as permitted by Crown policy. Reporting to work under the influence of or impaired by alcohol or any other substance is strictly prohibited.

**Never tolerate violence in the workplace.** Crown does not tolerate weapons, workplace violence, or threats in any of our facilities. Employees must remain alert and report any concerns related to safety or security in accordance with Crown policies and guidance.



EXPLORE THE DETAILS

See [FAQs](#) for answers to common questions and further explanation of key topics.

# Show Respect

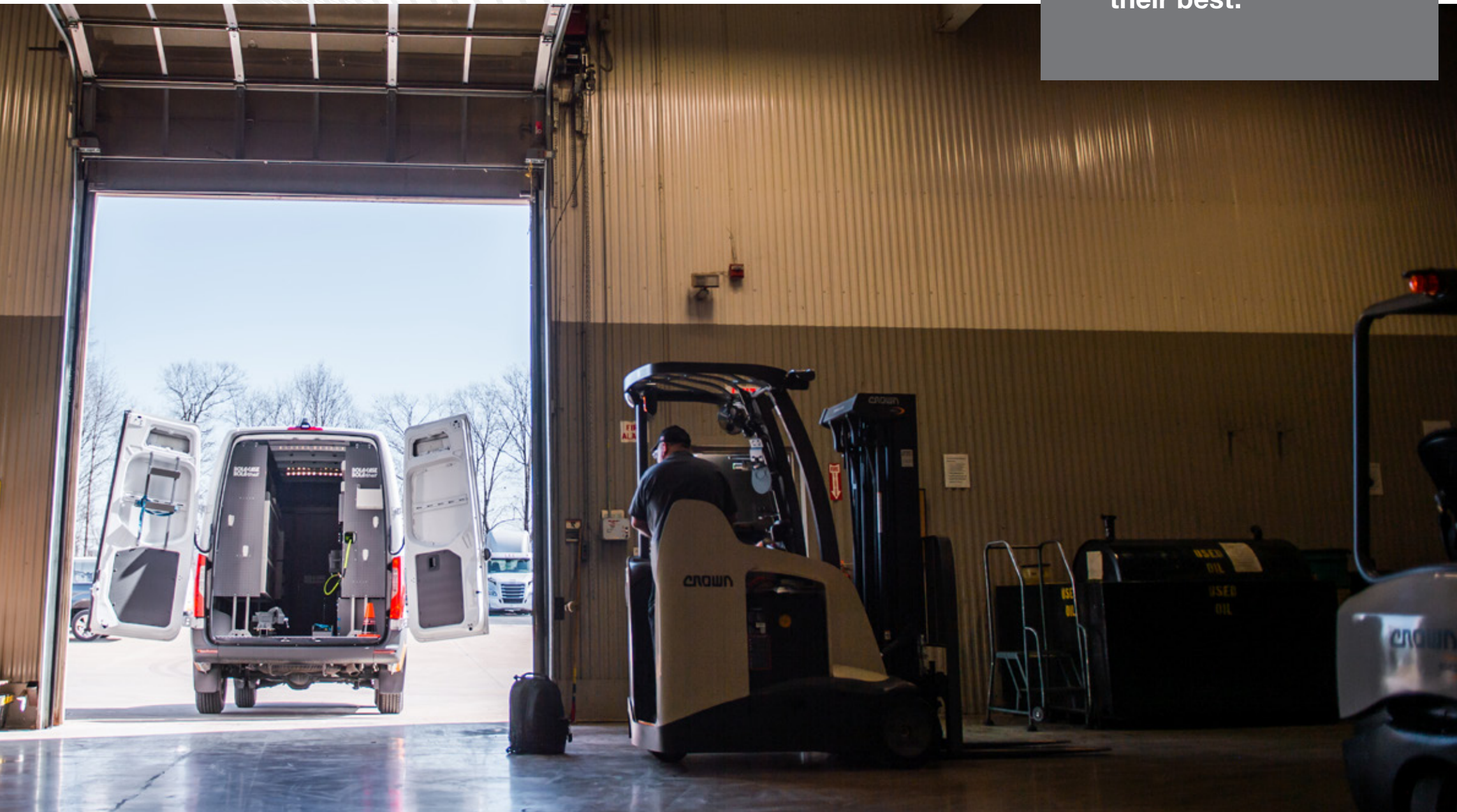
Everyone at Crown has a job to do, and it is important that we maintain a work environment that is free from harassment, bullying, and intimidation. When we maintain a respectful workplace, we build stronger teams where everyone is empowered to do their best.

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**Treat everyone with respect.** Show respect and professionalism to everyone you encounter as part of your work, from other Crown employees to business partners, customers, and regulators. People do their best work when they are treated with respect.

**Recognize and address the many forms of disrespectful treatment of others.** We are committed to maintaining a workplace free of harassment (including sexual harassment), threats, intimidation, abusive conduct, and bullying. By learning to recognize the various words and actions that are inappropriate, we can help prevent them from disrupting our work environment.

**Don't ignore situations.** If you believe you may have witnessed or experienced inappropriate treatment, discrimination, or harassment — or suspect that someone else has — take immediate action by sharing your concerns with your supervisor, Human Resources, Compliance & Ethics, or Connect with Crown. Remember, Crown prohibits retaliation against anyone who reports a concern in good faith.



# Connect with Our Company

[Protect Crown's Assets](#)

[Use Artificial Intelligence with Care](#)

[Avoid Conflicts of Interest](#)

[Protect Confidential Information and Intellectual Property](#)

[Protect Privacy](#)

[Maintain Good Records](#)

[Communicate Responsibly](#)

# Protect Crown's Assets

Crown relies on a wide range of assets — from physical equipment to digital systems — to operate effectively. As employees, we all share responsibility for safeguarding and protecting these resources.

**Prevent theft, fraud, and waste.** Safeguard all assets assigned and entrusted to you (including tools, raw materials, vehicles, furniture, PCs, laptops, mobile devices, and software). Never borrow, sell, or give away assets unless you have the authority to do so. Keep your offices and workstations secure. Report any concerns in accordance with applicable Crown policies and guidance.

**Use as directed.** Crown assets are meant for legitimate company business. Limited personal use of electronic systems such as phone or email may be permitted if it does not interfere with work responsibilities or violate company policies.

**Practice good cybersecurity.** Only use Crown-approved hardware, software, applications, and storage devices when conducting Crown business. Stay vigilant against phishing, malware, ransomware, and other types of attacks.



**As employees, we all share responsibility for safeguarding and protecting these resources.**

## Best Practices to Prevent Phishing, Malware, Ransomware and other attacks:



**Promptly complete mandated cybersecurity trainings and follow their requirements.**



**Always protect usernames and passwords.**



**Never click on suspicious links, even if you think you know the sender.**



**Report any known or suspected cyber breaches to the Cyber Security team ([cyber.security@crown.com](mailto:cyber.security@crown.com)) and your manager immediately.**



### EXPLORE THE DETAILS

See our [Electronic Resources Policy](#).

Due to European legal requirements, the policies governing electronic assets in Europe are different from other countries. Employees in Europe must visit the Information Services section of the European Crown intranet for more information.

See [FAQs](#) for answers to common questions and further explanation of key topics.

# Use Artificial Intelligence with Care

Crown cultivates innovation while maintaining a strong commitment to responsible practices. Our success is rooted in our ability to balance a time-tested commitment to quality with a thoughtful embrace of emergent technologies. Artificial intelligence (AI) presents many opportunities and can provide valuable support, but it must be used carefully.

**Use the right tools for the job.** When using AI as part of your work, limit your use to tools and applications that have been vetted and approved by Crown.

**Check your inputs and outputs.** Be thoughtful about what kinds of information you feed into AI programs and verify the accuracy and reliability of AI-generated outputs. AI tools frequently produce errors and lack important real-world context. Make sure the output is correct, current, and free of bias.

**Remember, AI isn't accountable – only you are.** Never trust AI with strategic decisions about our company, our employees, our partners, or our customers. Remember, AI is a support tool and not a decision maker. Employees remain fully responsible and accountable for the work they produce.



## EXPLORE THE DETAILS

See our [Generative Artificial Intelligence User Policy](#).

See [FAQs](#) for answers to common questions and further explanation of key topics.

# Avoid Conflicts of Interest

We all have commitments, pursuits, and relationships outside of our jobs. However, if personal interests interfere or appear to interfere with an employee's ability to make unbiased decisions at work, this is considered a conflict of interest. Each of us must recognize and avoid these activities.

**Recognize a conflict when you see one.** Even though it's not possible to list every conflict scenario, there are certain situations in which conflicts are more likely to occur. Being familiar with these situations is the first step in avoiding them.

- **Personal relationships:** Supervising a friend, family member, or partner, or directing business to them
- **External engagements:** Allowing a second job or other outside activity to interfere with your responsibilities at Crown
- **Financial interests:** Investing directly in any company that competes or does business with Crown
- **Business opportunities:** Taking personal advantage of opportunities you learned about through work that could have benefited the company
- **Gifts:** Accepting or giving, frequent or improper gifts or other items of value

**Disclose potential conflicts.** If you have a conflict of interest, discuss the situation with your manager. Disclosure allows the company to assess and address the situation appropriately. Most conflicts can be resolved or mitigated through transparency, proper review, and the application of safeguards if they are promptly disclosed. You can use the Conflict of Interest Disclosure Statement to disclose any potential or actual conflicts of interest at any time.



## EXPLORE THE DETAILS

See our [Conflict of Interest Policy](#). See our [Conflict of Interest Disclosure Statement](#).

See [FAQs](#) for answers to common questions and further explanation of key topics.

# Protect Confidential Information and Intellectual Property

Crown's confidential information and intellectual property are central to how we operate and compete in the marketplace. Protecting this information is essential to being able to compete effectively.

## Examples of confidential information include:

- Marketing strategies
- Customer lists
- Product development plans
- Manufacturing methods
- Pricing information

## Recognize and protect confidential information.

Take responsibility for protecting all confidential information in your work. If you're not sure whether information is confidential, assume it is.

**Share with care.** Do not disclose Crown's confidential information to third parties without prior authorization, and do not use it for personal gain.

**Protect Crown's intellectual property.** You are responsible for protecting Crown's intellectual property and promptly reporting any unauthorized use by or disclosure of Crown's intellectual property by third parties. Examples of Crown's intellectual property include inventions, know-how, designs, software, trademarks, copyrights, and other proprietary information made for or owned by Crown.

**Know your full responsibilities.** Crown employees must protect confidential information belonging to third parties (including our customers) that they receive in connection with work. Your obligation to protect Crown confidential information and confidential information of third parties continues after your employment with Crown ends.



## EXPLORE THE DETAILS

See [FAQs](#) for answers to common questions and further explanation of key topics.



# Protect Privacy

From time to time, you may have access to personal data of Crown's employees, customers, business partners, and others. You must safeguard and use this data only in accordance with applicable laws, regulations, and our privacy policies.

**Recognize personal data.** "Personal data" refers to any information that can directly or indirectly identify an individual, either on its own or when combined with other information.

**Some examples of personal data include:**

- Names
- Addresses
- Email or IP addresses
- Birth dates
- Phone numbers
- Employee ID numbers
- Location data
- Health or benefits information
- Bank or credit card information
- Pay or performance information



If you are unsure whether information qualifies as personal data, assume that it is and seek further guidance.

**Limit your use of personal data.** Collect and use personal data only for legitimate business purposes, in accordance with our policies and applicable laws, and only where there is an appropriate legal basis and authorization for doing so. Gather only the minimum amount needed to fulfill the business purpose.

**Protect personal data.** Follow our cybersecurity best practices for handling and securely storing personal data. Stay vigilant for phishing scams or other attempts to access our systems. Always protect usernames and passwords and never click on suspicious links. Report any known or suspected cyber breaches to the Cyber Security team ([cyber.security@crow.com](mailto:cyber.security@crow.com)) and your manager immediately.

**Limit sharing of personal data.** Personal data must only be shared via secured networks and systems approved by Crown. Only share data with those who are authorized and have a legitimate reason to access it.



**EXPLORE THE DETAILS**

See [FAQs](#) for answers to common questions and further explanation of key topics.

# Maintain Good Records

Accurate recordkeeping is essential to Crown's operations and long-term success. Business records — including financial reports, tax filings, expense reports, and operational data — support decision-making and help us maintain the trust of our customers and stakeholders.



EXPLORE THE DETAILS

See [FAQs](#) for answers to common questions and further explanation of key topics.

**Be accurate, thorough, and timely.** No matter what job you do — whether you are submitting a timesheet, an invoice, an expense report, a maintenance report, or any other “record” — make sure the information is complete and precise. Create and submit records promptly to help ensure accuracy.

**Meet our legal and regulatory requirements.** Employees responsible for preparing financial reports or disclosures for Crown must follow internal controls and disclosure procedures as well as applicable laws, regulations, and accounting standards.

**Respect the contracting process.** Contracts, including non-revenue contracts, must reflect an accurate description of the work to be done or the terms and details of the arrangement. Be certain to obtain all necessary approvals before the agreement is signed. When appropriate, seek review from Crown's Law Department.

**Practice good records management.** Follow applicable legal requirements as well as Crown's processes for managing, storing, and properly disposing of Crown's records.

**Speak up.** If you see or suspect activity that could compromise the integrity of our accounting systems or business records, [report it immediately](#).

# Communicate Responsibly

Crown's reputation depends on clear, accurate, and responsible communication. From press statements to personal social media activity, everything we say can leave a lasting impact on how our company is perceived. All employees share responsibility to communicate with clarity, professionalism, and honesty.

**Leave it to the experts.** We have a team of dedicated communication experts who ensure public messaging about Crown is accurate, honest, and consistent. Forward all media inquiries or requests for comment to the Crown Marketing Department. Only employees authorized to speak on behalf of Crown may communicate with media, analysts, online forums, or other public platforms in an official capacity. Your communications must always be professional, [respectful](#) and aligned with Crown's values.

**Use Care Online.** Social media platforms (such as Facebook, LinkedIn, X, TikTok, Snapchat, and blogs) are part of both our personal and professional lives. However, what you share — whether during or outside of work hours — can influence how others perceive you and your connection to Crown. Unless specifically approved, social media must not be used for day-to-day work. If your profile or posts indicate any affiliation with Crown, and you choose to comment on public, non-Crown-related topics, you must clearly state that your views are your own and do not represent Crown.

**Get approval before you speak.** In some instances, it may be appropriate for employees to speak as representatives of Crown at public gatherings, industry events, or to the media. Before doing so, always seek authorization and guidance from the Marketing Department.



EXPLORE THE DETAILS

See [FAQs](#) for answers to common questions and further explanation of key topics.

# Connect with Business Partners

[Compete Fairly and Legally](#)

[Never Tolerate Bribery and Corruption](#)

[Follow Gift and Hospitality Rules](#)

[Follow Global Trade Laws](#)

## Compete Fairly and Legally

Healthy competition can spur us to be our very best. That's why Crown is committed to fair and lawful competitive practices. Our success is built on the quality of our products, our people, and our services. Employees must comply with all applicable antitrust and competition laws.



**Always be honest.** Employees must represent Crown's products and services honestly, and not make misleading statements or unrealistic promises in our communications, including marketing and advertising.

**Avoid activities that can limit competition.** Employees must not enter into formal or informal agreements with competitors to fix prices, coordinate contract terms, divide sales territories or suppliers, rig bids, or otherwise limit competition. Do not discuss Crown's hiring policies or wage structure with other employers or enter into any hiring agreements with them. **Remember that even a casual conversation can be considered an "agreement."**

**Follow antitrust laws.** Familiarize yourself with and always follow antitrust laws of the United States and other countries where Crown operates. Contact Compliance & Ethics if you're not sure whether and how those laws apply to your work.

**Fact-find the right way.** Only use lawful, ethical, and publicly available sources of information when gathering business intelligence. Respect the intellectual property rights and confidential information of others — including competitors.



### EXPLORE THE DETAILS

See our [Antitrust Guidelines for Competitor Interactions](#) and [Antitrust Guidelines for Human Resources](#).

See FAQs for answers to common questions and further explanation of key topics.

# Never Tolerate Bribery and Corruption

At Crown, our success is based on the strength of our products, services, and people, not on underhanded incentives or business practices. Crown prohibits all forms of bribery and corruption. Business decisions must be based on merit, not improper influence.



**Recognize the many forms of bribery.** Anything of value that is given with the goal or effect to influence a decision or gain a business advantage could be considered a bribe. This includes cash and cash equivalents (such as gift cards, digital payment credits, vouchers, prepaid cards, checks, negotiable instruments, or cryptocurrencies) as well as a gift, a loan, a discount, an offer of entertainment or travel, a charitable or political contribution, or offers of employment.

**Know what is permitted.** Crown is subject to the Foreign Corrupt Practices Act of 1977 (FCPA), the U.K. Bribery Act, and anti-corruption and anti-bribery laws of the jurisdictions in which we conduct business worldwide. Generally, these laws prohibit employees of Crown and its subsidiaries from paying bribes, falsifying corporate records, or circumventing the internal policies of the recipient. If you're unsure whether a gift or transaction constitutes a bribe or is otherwise impermissible, consult Compliance & Ethics.

**Choose partners wisely.** In selecting business partners, carefully consider a wide range of objective criteria. Check not only the partners' qualifications but also their reputation for conducting business ethically and lawfully.

**Track payments closely.** Employees must maintain accurate records of all transactions, including timely and accurate Travel & Expense submissions, that clearly and honestly describe the purpose of each payment. Do not ask others to do something that you aren't permitted to do yourself. Remember, Crown and you may be held responsible for bribes made by Crown's business partners, so choose carefully and monitor their work closely.

**Use extra care with government officials.** In some of the countries where we operate, bribes made to government officials can carry significant penalties. Be on high alert for any signs of corruption. Never give or accept anything of value to or from a government official without contacting Compliance & Ethics for approval in advance.



EXPLORE THE DETAILS

See our [Anti-Bribery & Corruption Policy](#).

# Follow Gift and Hospitality Rules

A modest gift or a shared meal to discuss business can be a great way to show appreciation and strengthen working relationships. But the exchange of professional courtesies must always be handled carefully so as not to suggest bribery or corruption. These occasional exchanges must avoid the appearance of improper influence.

**Follow our policies.** Follow our policies when giving or accepting gifts or hospitality. These exchanges must be intended to build goodwill — not influence business decisions — and must be non-cash, customary, lawful, and reasonable in value. If there is any doubt about appropriateness of a gift or hospitality, employees must seek guidance from management or Compliance & Ethics.

**Be transparent.** Document all expenses related to gifts, meals, and entertainment. Make the necessary disclosures and seek pre-approval as required by Crown policies.

**Trust your intuition.** If a gift or invitation appears to come with an expectation of

reciprocal gifts or favorable business terms in return, then it is no longer a gift and must be declined. Likewise, do not actively solicit gifts, complimentary services, travel, or entertainment from anyone with whom Crown does business.

**Use extra care with government officials.** The rules around exchanging gifts and hospitality with government officials are much stricter than in the private sector. Offers made to government officials can more easily constitute bribery or corruption. You must not provide any payment, gift, or entertainment to any government official before obtaining pre-approval from Compliance & Ethics.



The exchange of professional courtesies must always be handled carefully so as not to suggest bribery or corruption.

## Appropriate Offers Are:

- ✓ Nominal in value, like promotional items
- ✓ Legal and in line with both parties' policies
- ✓ Reasonable, like modestly priced business meals
- ✓ Given or received in an honest and transparent manner

## Inappropriate Offers Are:

- ✗ Cash or a cash equivalent
- ✗ Offered frequently or for non-business reasons
- ✗ Likely to create an obligation or influence someone's judgment
- ✗ Offered in exchange for favors or special treatment



EXPLORE THE DETAILS

See our [Anti-Bribery & Corruption Policy](#).

# Follow Global Trade Laws

With more than 20 manufacturing facilities and over 500 global sales and service locations spanning nearly every continent, Crown is very much a global company. As such, we are committed to navigating and complying with the complex and changing landscape of international trade laws and regulations.

**Understand and follow the law.** Ask yourself, “Does the work I do impact items that are imported or exported?” If the answer is yes, remember that international trade compliance laws are complex and subject to frequent change and must be followed.

**Carefully document all transactions.** Provide complete and accurate information to our export and import compliance teams. This information may include import and export classifications, value, country of origin, country of destination, the end use, and the end user. Remember, as you conduct business internationally, the laws of more than one country apply.

**Be cautious.** Failure to meet Crown’s trade compliance obligations may result in significant penalties for both the company and our employees. When in doubt about how trade laws impact your work, contact Trade Compliance for guidance.

## Global Trade Laws address:



### Import and customs activities

Laws ensuring accurate tariff classification, value, country of origin, product marking and other elements.



### Exports and export controls

Laws regulating or restricting the export of items due to national security, foreign policy, anti-terrorism, or non-proliferation.



### Trade embargoes and economic sanctions

Laws prohibiting or restricting business dealings with certain countries or entities.



### Anti-boycott compliance

Laws prohibiting participation in unsanctioned boycotts or a refusal to trade with a specific country.



### Recordkeeping

Laws in each country include specific record-keeping requirements for import and export transactions.

# Connect with Our Communities

[Uphold Human Rights](#)

[Protect Our Planet](#)

## Uphold Human Rights

As a global company, Crown is committed to respecting and protecting human rights of our employees and business partners everywhere we do business. Safe, dignified, and fair working conditions throughout our organization and supply chain are an integral part of our values and responsible business practices.

**Ensure all labor is freely chosen.** Crown does not tolerate any form of slavery or forced labor within our supply chain in any location where we do business. This includes prison labor, labor obtained through human trafficking, child labor, or labor performed “off the clock.”

**Guarantee humane working conditions.** We are committed to maintaining safe and humane working conditions throughout our operations. Crown will never tolerate hazardous or unsafe working conditions, physical punishments, or illegal working hours. We also comply with all laws regarding our employees’ rights to free association and collective bargaining.

**Hold business partners accountable.** Our commitment to human rights extends to anyone we partner or do business with. If you witness or suspect human rights violations anywhere in our supply chain, contact Compliance & Ethics immediately. We will never knowingly do business with any person or company that might violate the rights of others.



# Protect Our Planet

Crown pursues eco-friendly practices throughout our operations. We strive to minimize our environmental footprint by optimizing energy use, recycling, reducing waste, and handling materials responsibly. Crown employees are asked to be committed to responsible environmental stewardship.

**Comply with the law.** Crown requires all employees to follow all applicable environmental and sustainability laws and regulations as they pertain to us everywhere we do business. Know how these regulations apply to your job and complete all the required training.

**Don't ignore issues.** If you know or suspect environmental hazards or violations might be occurring anywhere in our operations or supply chain, Speak Up. Crown is committed to lawful and sustainable waste management and responsible material sourcing.

**Be accountable.** Crown holds ourselves accountable and tracks our progress on environmental and social issues in Crown's annual Sustainability report. Review this document to find out more about Crown sustainability commitments.



## EXPLORE THE DETAILS

See our Sustainability Report and Policy, which are available on the Sustainability page at [crown.com](https://crown.com).

See FAQs for answers to common questions and further explanation of key topics.



# Connect with Crown

Our Code of Conduct only works if we all work to protect and uphold its standards and spirit. Maintaining the integrity of the Code depends on employees speaking up about concerns, noncompliance, or potential violations.

Employees must comply with all applicable laws and regulations. If you know about or suspect a violation of the law, report it as soon as possible or seek guidance through one of the avenues listed below. See Crown's [Whistleblowing and Whistleblower Protection Policy](#) for more information.

## Let Us Help You Do the Right Thing

We know speaking up isn't always easy. That's why Crown provides multiple avenues for asking questions and raising concerns including:

- Your own or another Supervisor
- Your Human Resources Representative
- Compliance & Ethics: [Compliance@Crown.com](mailto:Compliance@Crown.com)
- The Law Department
- Connect with Crown

## Connect with Crown

Crown recognizes that there are times when speaking up may be uncomfortable. Therefore, Connect with Crown ([www.connectwithcrown.com](http://www.connectwithcrown.com)) is available for confidential and, if desired, anonymous reporting. Connect with Crown is hosted by a third-party hotline provider and is available 24 hours a day, 7 days a week. Connect with Crown is available to both employees and to third parties, including contractors, dealers, suppliers, and customers. The information you provide will be passed along to the appropriate Crown management representative.



## What Happens Next?

No matter how you file a report, Crown will take it seriously. Every report is carefully reviewed to evaluate the concern and determine the most appropriate way to address and resolve it. Each report will be assessed and considered by appropriate Crown personnel who are charged with evaluating the report, deciding whether to proceed with an investigation, and ensuring any investigation is performed in a professional and confidential manner. To help ensure a prompt and thorough investigation, please provide as much detail as possible (who, what, where, and why) and cooperate fully with any ensuing investigation.

Crown may provide feedback on the investigation's progress, outcome, and/or any remediation actions, where appropriate and in line with legal requirements, while protecting the privacy of those involved. However, not all responses may be visible to the reporter.

## Our Commitment to Non-Retaliation

Speaking up in good faith is always the right thing to do and no one will be punished for it. Crown does not retaliate against anyone who participates in an investigation or reports a violation of the Code or applicable law in good faith. If you believe you are the target of retaliation or have witnessed retaliation against someone else, report it immediately. Any retaliation is a serious offense and will result in disciplinary action, which may include termination of employment.



### EXPLORE THE DETAILS

See our [Whistleblowing and Whistleblower Protection Policy](#), that is also available on [crown.com](http://crown.com).

See [FAQs](#) for answers to common questions and further explanation of key topics.

# Frequently Asked Questions

This content is provided in addition to the Code of Conduct. While the Code outlines the laws, policies, and requirements that apply to our work and offers practical guidance for navigating real-world situations, the Frequently Asked Questions (FAQ) are intended to provide clarity on topics within the Code. Any conflict between this FAQ and the Code of Conduct will default to the Code itself.

## Stay Healthy and Safe

**I noticed a new employee operating equipment that I don't think the new employee is trained or authorized to use. They seem confident so should I stay out of it?**

No. Safety rules exist to protect everyone. Employees must only operate equipment they are trained and authorized to use. Speak up and report the concern to your manager or the appropriate safety representative.

**A machine in my area occasionally malfunctions, but production deadlines are tight right now and no one has been injured yet. Should I wait to report it?**

No. Unsafe conditions and equipment concerns must be reported right away, even if no injury has occurred. Addressing possible hazards early helps prevent accidents and protects everyone in the workplace.



## Protect Crown Assets

**I sometimes use my company laptop for personal email during lunch breaks. Is that allowed?**

Limited personal use of company systems may be permitted if it does not: interfere with your work, create security risks, or violate company policies. Ask your manager for more details if you are unsure. Always use company assets responsibly and follow cybersecurity requirements. Refer to [Electronic Resources Policy](#) for more information.

**I received an email from someone claiming to be from IT asking me to click a link and reset my password. The message seemed urgent. What should I do?**

Check before you act. Cybercriminals often create urgent-looking messages to trick employees into revealing passwords or sensitive information. Do not click suspicious links or provide credentials. Report the message to your manager and the Cyber Security team immediately.

## Artificial Intelligence

**I'm a manager trying to decide between two well-qualified candidates to hire for my team. Sometimes I find it helpful to bounce ideas off a public AI assistant. If I remove the candidates' names and contact information, can I input their resumes into the AI assistant and ask the AI tool for a recommendation?**

No. Even without names or contact details, resumes often contain information that could identify a person. In addition, managers must never rely on AI tools to make major strategic employment decisions such as who to hire or promote. AI can support your work, but it cannot replace human judgment, accountability, or respect for the candidates involved.

**I am troubleshooting a manufacturing issue and would like help analyzing code and improving efficiency. Can I paste part of Crown's production code into a public AI tool to help identify bugs and suggest improvements if I remove all proprietary details?**

No, this is not permitted. Only Crown-provided AI tools are permitted for creating, transmitting, processing, or storing Crown data. Privately owned or publicly licensed AI tools must not be used for Crown business. Refer to the [Generative Artificial Intelligence User Policy](#).

## Avoid Conflicts of Interest

**My cousin owns a company that wants to become a Crown supplier. Can I participate in the selection process?**

No. Personal relationships can create an actual or perceived conflict of interest. You must disclose the relationship to your manager and Compliance & Ethics so the situation can be addressed appropriately.

## Protect Confidential Information and Intellectual Property

**A customer asked me to share details about an upcoming product that has not been publicly announced yet. Can I provide a preview to help strengthen the relationship?**

No. Nonpublic new product information is confidential and must only be shared with authorized individuals who have a legitimate business need to know. Protecting confidential information helps preserve customer trust and Crown's ability to compete.

## Protect Privacy

**I am working on a new internal project and would like to use customer contact information from our sales database to send a survey. Can I use that data?**

You may only use that personal data if the survey is for an approved business purpose, the use is permitted under Crown's privacy policies, and the individuals' data was originally collected in a way that allows for that use (which typically includes the individuals' consent). Before proceeding, you must confirm with Compliance & Ethics that the planned use is allowed. If approval has not been given, or if the data will be used in a way that is inconsistent with its original and authorized purpose, then you may not use it.



## Maintain Good Records

**I realized I made a mistake on an expense report I already submitted. Since it was unintentional and the amount was small, should I just leave it alone?**

No. Even small inaccuracies should be corrected promptly. Honest and accurate records are essential to maintaining trust and complying with legal and financial requirements.

**I made a verbal agreement with a supplier to adjust pricing. Can I update our supplier file without formal documentation?**

No. Changes to agreements must be properly documented and approved. Records must reflect verified and authorized information.

## Communicate Responsibly

**A reporter contacted me to confirm basic information about Crown and its products. Since the reporter is on a deadline and isn't asking about anything confidential, can I answer the questions?**

No. Only authorized spokespersons can speak to the media on behalf of Crown. You must politely direct the reporter to the Crown Marketing Department or another authorized spokesperson. Protecting Crown's reputation and ensuring accurate, consistent messaging is always our priority.

## Compete Fairly and Legally

**While attending a trade show, I ran into a former coworker who now works for a competitor. During lunch, she casually shared some information about her company's product pricing strategies. I didn't ask for it. Can I still use this information?**

No. Discussions about pricing or other competitively sensitive information with a competitor can create a perception that Crown is violating antitrust laws even if the information is volunteered. You must immediately end the conversation and report the interaction to your manager, the Crown Law Department, and Compliance & Ethics as soon as possible.

## Protect Our Planet

**I noticed materials were being disposed of at one of our facilities in a way that I believe might be impermissible, but I'm not part of the safety team. Should I still report it?**

Yes. Environmental stewardship is everyone's responsibility. If you see or suspect inappropriate disposal practices or potential environmental violations, report the concern immediately so it can be investigated and addressed.

## Connect with Crown

**I recently heard that someone on my team has been accepting kickbacks from one of our suppliers in exchange for our continued business. But I only heard it through workplace rumors. Should I report it?**

Yes. Even if you don't know all the facts, allegations involving bribery or kickbacks are serious and must be reported and investigated. Be clear in your report that it is based upon a rumor and that you do not have evidence or any confirmed information.

**I want to report a concern, but I'm worried my manager or coworkers will find out. What should I do?**

Crown offers several ways to raise concerns including confidential and, where permitted by law, anonymous reporting through [Connect with Crown](#). Crown prohibits retaliation against anyone who reports a concern or participates in an investigation in good faith.

**I'm not completely sure whether something violates the Code of Conduct. Should I wait until I have proof before speaking up?**

No. You are encouraged to raise concerns whenever something does not seem right. You must not investigate or prove misconduct yourself before reporting. Reporting concerns early helps Crown address issues appropriately and maintain our culture of integrity.





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