GENERAL

Code of Conduct

Policy Owner: Paul Jones

Version: 2.0

Last Reviewed: 2026-02-24

1. Purpose

Crystal Project Inc. (“Crystal”) is committed to fostering an inclusive, collaborative, and professional working environment.

This Code of Conduct defines expected standards of behavior and outlines consequences for unacceptable conduct.

2. Scope

This Code of Conduct applies to:

- All employees
- Contractors
- Leadership
- Anyone representing Crystal in a professional capacity

The Code applies during:

- All business activities
- Remote work
- Company-sponsored events
- Conferences or external events attended on behalf of Crystal
- Online and in-person communications related to Crystal business

This Code may also apply to conduct outside business activities when such behavior adversely affects the safety, well-being, or professional environment of Crystal personnel or customers.

3. Core Values

Be Welcoming

Crystal strives to be a workplace that supports individuals of all backgrounds and identities. Discrimination based on race, ethnicity, national origin, gender, gender identity or expression, sexual orientation, religion, age, disability, socioeconomic status, or other protected characteristics will not be tolerated.

Be Respectful

Disagreement is natural. Personal attacks, harassment, or intimidation are not acceptable. All personnel are expected to interact professionally and respectfully with colleagues, customers, and partners.

Be Considerate

Decisions and actions affect others. Personnel are expected to act thoughtfully and in ways that support collaboration and psychological safety.

4. Expected Behavior

All personnel are expected to:

- Engage professionally and constructively
- Exercise respect in speech and conduct
- Attempt collaboration before escalating conflict
- Refrain from discriminatory, harassing, or demeaning behavior
- Report dangerous situations or violations of this Code

5. Unacceptable Behavior

The following behaviors are prohibited:

- Violence or threats of violence

- Discriminatory or hateful language
- Sexual harassment or unwelcome sexual attention
- Personal insults related to protected characteristics
- Deliberate intimidation or stalking (online or in person)
- Posting or threatening to post personal information without consent
- Inappropriate physical contact
- Advocacy of any of the above behaviors
- Retaliation against individuals who report concerns

Other conduct that would reasonably be considered inappropriate in a professional setting may also be addressed under this policy.

6. Weapons

Weapons are not permitted at company-sponsored events or business gatherings. Weapons include firearms, explosives, or other items intended to cause harm.

Personnel must comply with applicable laws at all times.

7. Reporting Concerns

Anyone who experiences or witnesses unacceptable behavior should promptly report it to:

- The Policy Owner, or
- Executive leadership

Reports will be handled discreetly and investigated appropriately.

Retaliation against any individual who reports a concern or participates in an investigation is strictly prohibited.

8. Disciplinary Action

Violations of this Code may result in disciplinary action proportionate to the severity of the conduct, up to and including termination of employment or contract.

Leadership will determine appropriate corrective action.

9. Responsibility

The Policy Owner is responsible for maintaining and enforcing this Code of Conduct.

All personnel share responsibility for upholding these standards.

10. Review History

Version	Date	Description	Author
1.0	2021-08-23	Initial Version	—
2.0	2026-02-24	Updated for legal entity alignment and remote-first model	Paul Jones