



CREATONS

**CREATONS Policy Conformance with
Responsible Business Alliance (RBA) Code of Conduct v8.0 (2024)**

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INTRODUCTION

The Responsible Business Alliance (RBA), formerly the Electronic Industry Citizenship Coalition (EICC), Code of Conduct establishes standards to ensure that working conditions in the electronics industry or industries in which electronics is a key component and its supply chains are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.

This CREATONS RBA Code of Conduct (the Code) is based on the RBA Code of Conduct version 8.0 (2024), which is maintained and updated by RBA from time to time. CREATONS is adopting the Code for CREATONS suppliers (Suppliers) and for its own operations. All Suppliers involved in the manufacturing of CREATONS products, product components, sub-assemblies, and materials, packaging or that provide services to or on behalf of CREATONS are required to comply with the Code. Whilst we recognize that the existence of difference legal and cultural environments in which Suppliers operate around the world, this Code establishes the minimum requirements that all Suppliers are expected to meet in doing business with CREATONS.

The Code is made up of five sections. Sections A, B, C, D & E outline standards for Labor, Health and Safety, Environment, business ethics and Management system.

In the left column, RBA Code is provided in full and in the Right column CREATONS provides reference to its Policies.

RBA Code of Conduct V8.0 (2024)		CREATONS Policy
A: Labour		
1.	Prohibition of Forced Labour <i>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.</i>	CREATONS “Forced Labour Prohibition Policy”
2.	Young Workers <i>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.</i> <i>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.</i>	CREATONS “Young Workers Policy”
3.	Working Hours <i>Working hours shall not exceed the maximum set by local law. Further, a workweek shall not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime shall be voluntary. Workers shall be allowed at least one day off every seven days.</i>	CREATONS “Working Hours Policy”
4.	Wages and Benefits <i>Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All workers shall receive equal pay for equal work and qualification. 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 shall be within the limits of the local law.</i>	CREATONS “Wage Policy”

5.	Non-Discrimination/Non-Harassment/Humane Treatment <i>Participants shall commit to a workplace free of harassment and unlawful discrimination. There shall be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Companies shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or 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.</i>	<p>CREATONS “Anti-Discrimination Policy”</p> <p>CREATONS “Anti Harassment Abuse Policy”</p>
6.	Freedom of Association and Collective Bargaining <i>Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers and/or their representatives shall be 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. In alignment with these principles, 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. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations.</i>	<p>CREATONS “Freedom of Association Policy”</p>

B. Health and Safety

1.	Occupational Health and Safety <i>Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) shall be identified and assessed, mitigated using the Hierarchy of Controls. Where hazards cannot be adequately controlled by these means, workers shall be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Gender-responsive measures shall be taken, such as not having pregnant women and nursing mothers in working conditions, which could be hazardous to them or their child and to provide reasonable accommodations for nursing mothers.</i>	<p>CREATONS is certified for the International Standard i.e. ISO 45001:2018.</p> <p>CREATONS “EHS policy” commits for Occupational Health and Safety in the premises.</p>
2.	Emergency Preparedness <i>Potential emergency situations and events shall be 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. Emergency drills shall be executed at least annually or as required by local law, whichever is more stringent. Emergency plans shall also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans.</i>	<p>CREATONS “Emergency Preparedness Plan” covers all the Potential Emergencies and conducts mock drill for same.</p>

	<i>Such plans and procedures shall focus on minimizing harm to life, the environment, and property.</i>	
3.	Occupational Injury and Illness <i>Procedures and systems shall be in place to prevent, manage, track and report occupational injuries and illnesses, 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 the return of workers to work. Participants shall allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation.</i>	<p>CREATONS “Incident Investigation SOP”</p> <p>We at CREATONS encourage employees to report injuries so that corrective and preventive action can be taken.</p>
4.	Industrial Hygiene <i>Worker exposure to chemical, biological, and physical agents shall be identified, evaluated, and controlled according to the Hierarchy of Controls. When hazards cannot be adequately controlled, workers shall be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Participants shall provide workers with safe and healthy working environments, which shall be maintained through ongoing, systematic monitoring of workers’ health and working environments. Participants shall provide occupational health monitoring to routinely evaluate if workers’ health is being harmed from occupational exposures. Protective occupational health programs shall be ongoing and include educational materials about the risks associated with exposure to workplace hazards.</i>	<p>CREATONS provides PPE to every employee free of charge and conducts health checkup camp for routine health monitoring of employee.</p>
5.	Physically Demanding Work <i>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 shall be identified, evaluated, and controlled.</i>	<p>CREATONS “EHS policy” commits for Occupational Health and Safety in the premises.</p>
6.	Machine Safeguarding <i>Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers shall be provided and properly maintained where machinery presents an injury hazard to workers.</i>	<p>CREATONS is certified for the International Standard i.e. ISO 45001:2018.</p>
7.	Sanitation, Food and Housing <i>Workers shall be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Participant or a labor agent shall be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, and adequate conditioned ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.</i>	
8.	Health and Safety Communication <i>Participants shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly</i>	

	<i>posted in the facility or placed in a location identifiable and accessible by workers. Health information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable. Training shall be provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.</i>	
C. Environment		
1.	Environmental Permits and Reporting <i>All required environmental permits (e.g. discharge monitoring), approvals, and registrations shall be obtained, maintained, and kept current and their operational and reporting requirements shall be followed.</i>	CREATONS has a monitoring program of all legal compliances. HR official is designated for all compliances. CREATONS “EHS Policy”
2.	Pollution Prevention and Resource Conservation <i>Emissions and discharges of pollutants and generation of waste shall be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, shall be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.</i>	CREATONS has already established less pollution generating process. Environmental targets are taken to reduce pollution and for reduction in resource consumption.
3.	Hazardous Substances <i>Chemicals, waste, and other materials posing a hazard to humans or the environment shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data shall be tracked and documented.</i>	CREATONS HSE team ensures Hazardous substances are handled, moved, stored and disposed as per local laws. CREATONS “EHS Policy” also shows commitment of same.
4.	Solid Waste <i>Participants shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Waste data shall be tracked and documented.</i>	CREATONS HSE team ensures Solid waste is disposed of responsibly. CREATONS “EHS Policy” also shows commitment of same.
5.	Air Emissions <i>Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations shall be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone- depleting substances shall be effectively managed in accordance with the Montreal Protocol and applicable regulations. Participants shall conduct routine monitoring of the performance of its air emission control systems.</i>	CREATONS HSE team ensures Solid waste is disposed of responsibly. CREATONS “EHS Policy” also shows strong commitment of same.
6.	Material Restrictions <i>Participants shall adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.</i>	CREATONS “Material Restriction Policy” commits to adhere to restricted substances.

7.	Water Management <i>Participants shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater shall be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Participants shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.</i>	<p>CREATONS commits to conserve water and reduce wastage of water and ensure waste water is treated prior to discharge.</p> <p>CREATONS “Biodiversity Policy”</p>
8.	Energy Consumption and Greenhouse Gas Emissions <i>Participants shall establish and report against an absolute corporate-wide greenhouse gas reduction goal. Energy consumption and all Scopes 1, 2, and significant categories of Scope 3 greenhouse gas emissions shall be tracked, documented, and publicly reported. Participants shall look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.</i>	<p>CREATONS commits to conserve energy and reduce wastage of energy.</p> <p>CREATONS “Biodiversity Policy”</p> <p>For GHG Emissions, CREATONS monitors Scope 1 & 2 emissions.</p>

D. Ethics

1.	Business Integrity <i>The highest standards of integrity shall be upheld in all business interactions. Participants shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.</i>	<p>CREATONS “Anti Bribery Policy”</p> <p>CREATONS “Anti Corruption Policy”</p>
2.	No Improper Advantage <i>Bribes or other means of obtaining undue or improper advantage shall not be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti- corruption laws.</i>	<p>CREATONS “Intellectual Property Policy”</p>
3.	Disclosure of Information <i>All business dealings shall be transparently performed and accurately reflected on the Participant’s business books and records. Information regarding participant’s labor, health and safety, environmental practices, business activities, structure, financial situation, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable</i>	<p>CREATONS “Intellectual Property Policy”</p>
4.	Intellectual Property <i>Intellectual property rights shall be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information shall be safeguarded.</i>	<p>CREATONS “Intellectual Property Policy”</p>
5.	Fair Business, Advertising and Competition <i>Standards of fair business, advertising, and competition shall be upheld.</i>	<p>CREATONS “Anti Trust and Fair Competition Policy”</p>
6.	Protection of Identity and Non-Retaliation <i>Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers² shall be maintained, unless prohibited by law. Participants shall have a communicated process</i>	<p>CREATONS “Whistle Blow Policy”</p>

	<i>for their personnel to be able to raise any concerns without fear of retaliation.</i>	
7.	Responsible Sourcing of Minerals <i>Participants shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, gold, and cobalt in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas or an equivalent and recognized due diligence framework.</i>	CREATONS “Conflict Minerals Policy”
8.	Privacy <i>Participants shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Participants shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.</i>	CREATONS “Privacy and Confidentiality Management Policy”

E. Management System

1.	Company Commitment <i>Participants shall establish human rights, health and safety, environmental and ethics policy statements affirming Participant’s commitment to due diligence and continual improvement, endorsed by executive management. Policy statements shall be made public and communicated to workers in a language they understand via accessible channels.</i>	CREATONS “Ethics Policy” CREATONS “EHS Policy” CREATONS “Human Rights Policy” Policies have been made available at CREATONS website.
2.	Management Accountability and Responsibility <i>Participants shall clearly identify senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.</i>	CREATONS Plant Director and Manager has the ultimate responsibility for the Policy.
3.	Legal and Customer Requirements <i>Participants shall adopt or establish a process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.</i>	CREATONS HR Manager & EHS MR has been assigned the responsibility for all Legal compliances related to Local, National laws and Customer requirements.
4.	Risk Assessment and Risk Management <i>Participants shall adopt or establish a process to identify the legal compliance, environmental, health and safety³, labor practice and ethics risks, including the risks of severe human rights and environmental impacts, associated with Participant’s operations. Participants shall determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.</i>	CREATONS has established a risk assessment process and appropriate controls are implemented.
5.	Improvement Objectives <i>Participants shall establish written performance objectives, targets and implementation plans to improve the Participant’s social, environmental, and health and safety performance, including a periodic assessment of Participant’s performance in achieving those objectives.</i>	CREATONS has set Objectives for performance management, performance review and corrective and preventive action in relation to safety, health, environment and security compliance.

6.	Training <i>Participants shall establish programs for training managers and workers to implement Participant's policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.</i>	CREATONS employee receives training as per plan covering all EHS and Ethics aspects.
7.	Communication <i>Participants shall establish process for communicating clear and accurate information about Participant's policies, practices, expectations, and performance to workers, suppliers, and customers.</i>	Policies have been made available at CREATONS website for Communication.
8.	Worker/Stakeholder Engagement and Access To Remedy <i>Participants shall establish processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process shall aim to obtain feedback on operational practices and conditions covered by this Code, and to foster continuous improvement. Workers shall be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.</i>	CREATONS "Grievance and Suggestion Policy" CREATONS "Freedom of Association Policy"
9.	Audits and Assessments <i>Participants shall conduct periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.</i>	CREATONS conducts self assessment and evaluation for ensuring compliances.
10.	Corrective Action Process <i>Participants shall establish a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.</i>	CREATONS has established a process of Corrective and Preventive action.
11.	Documentation and Records <i>Participants shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.</i>	CREATONS has defined record retention period for all documents and records.
12.	Supplier Responsibility <i>Participants shall establish a process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.</i>	CREATONS performs due diligence on suppliers to ensure compliance to this code. CREATONS "Supplier Code of Conduct Policy"

¹ This code is not intended to create new and additional third-party rights, including for workers.

References:

The following standards were used in preparing this Code and may be a useful source of additional information.

Ethical Trading Initiative www.ethicaltrade.org/

ILO Code of Practice in Safety and Health

www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf

ISO 14001 www.iso.org

OECD Due Diligence Guidance http://www.oecd.org/document/36/0,3746,en_2649_34889_44307940_1_1_1_1,00.html

Universal Declaration of Human Rights www.un.org/Overview/rights.html

ISO 45001 www.iso.org

United Nations Convention Against Corruption www.unodc.org/unodc/en/crime_convention_corruption.html