

		<b>Policy Number:</b>	<b>CP-002</b>
<b>Subject:</b>	<b>Code of Conduct</b>	<b>Effective Date:</b>	<b>01/10/2022</b>
<b>Policy:</b>	<b>Code of Conduct Overview</b>	<b>Revision Date(s):</b>	<b>7/3/2018; 01/10/2022</b>

**I. Introduction.**

CREX is committed to conducting its affairs in compliance with all applicable laws and regulations and in accordance with the highest ethical standards. This Code of Conduct has been established to help ensure that CREX meet our commitment to ethical and lawful conduct. This Code of Conduct applies to all employees, officers, and directors of CREX as well as contractors, consultants and distributors that provide services on CREX’s behalf.

This Code of Conduct establishes policies and procedures that are intended to guide employees, officers, directors, contractors, consultants and distributors in the performance of their duties and responsibilities and ensure compliance with CREX’s commitment to ethical and lawful conduct.

Compliance Policy Statement

CrossRoads is committed to conducting its affairs in compliance with all applicable laws, and regulations and in accordance with the highest ethical standards. Our Code of Conduct applies to all employees and distributors with CrossRoads. Our objective is to inspire confidence and trust in our customers, vendors, distributors, employees, and shareholders that we will always act lawfully and ethically in our dealings with others.

**II. Basic Policies.**

1. Compliance with Laws: CREX will conduct its business and affairs in compliance with all laws, rules, and regulations and in accordance with CREX’s high ethical standards.
2. Work Environment: CREX will maintain a safe and drug-free work place that is free from discrimination and harassment based on race, color, creed, religion, sex, age, disability, national origin, ancestry, citizenship, armed forces service, marital or veteran status, sexual orientation, or any other impermissible factor.
3. Manufacturing Products: CREX is committed to producing products that are safe and effective. In developing and manufacturing medical devices and other products, CREX has established and will comply with standards that meet or exceed regulations promulgated by the Food and Drug Administration or the laws and regulations of the country of development and manufacture. In manufacturing its products, CREX will comply with all applicable laws and regulations, including those relating to the environment and occupational health and safety.
4. Competitive Practices: CREX will compete for all business opportunities vigorously, fairly, ethically, and legally. CREX will comply with all antitrust and other laws regulating competition and trade in each country where it conducts business and will not discuss pricing,

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cost, production plans, business strategies, or any other proprietary or confidential information with its competitors.

5. Marketing and Sales: CREX will represent its products and services accurately and will comply with applicable regulatory and legal requirements governing the marketing and sale of its products and services.

6. Recording and Reporting Information: In recognition of the fact that accurate information is essential to CREX’s ability to satisfy legal and regulatory obligations, all employees and directors will record and report all information accurately and honestly. No employee or director will sign or submit or permit others to sign or submit on behalf of CREX, any document or statement that he or she knows or has reason to believe is false.

7. Payments: CREX and its employees and directors will not make any improper payments to government or non-government officials, employees, customers, persons, or entities, nor will CREX or its employees and directors request or accept any improper payment from suppliers, customers, or anyone seeking to do business with CREX.

8. Fair Dealing: Each employee and director will deal fairly with CREX’s customers, suppliers, competitors, independent auditors, and other employees and will not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing or practice.

9. Confidential Information: No employee or director will use, for his or her own personal gain, or disclose to any third party, any confidential or proprietary information that he or she obtained as a result of his or her employment with or relationship to CREX. Confidential or proprietary information includes all nonpublic information that might be of use to competitors or harmful to CREX and its customers if disclosed.

10. Political Contributions: CREX will make no corporate political contributions to parties or individuals, even where such contributions may be legal, but encourages employees and directors to participate in community affairs and to exercise citizenship responsibilities.

11. Corporate Opportunities: Employees and directors owe a duty to CREX to advance its legitimate interests when the opportunity to do so arises. Employees and directors are prohibited from (a) taking for themselves personally opportunities that are discovered through the use of corporate property, information, or position, (b) using corporate property, information, or position for personal gain, or (c) competing with CREX.

12. Conflicts of Interest: No employee or director will engage in any activity or have any outside interest that might deprive CREX of his or her loyalty, interfere with the satisfactory performance of his or her duties, and make it difficult to perform his or her duties for CREX objectively and effectively, or be harmful or detrimental to CREX. Employees and directors must immediately disclose in writing any actual or potential conflict of interest that they may

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have to the Chief Executive Officer of CREX, for resolution. A conflict of interest occurs when a person's private interest interferes or appears to interfere in any way with CREX's interests and may also arise when an employee or director or a member of his or her family receives improper personal benefits as a result of his or her position with CREX.

Examples of actual or potential conflicts of interest include whenever:

(a) An employee or director holds an outside position or is engaged in an outside activity that affects the performance of his or her work for CREX.

(b) An employee or director, or any member of his or her family, is employed by, is a consultant to, or holds an ownership or other interest (other than a nominal investment in stock of a publicly traded company) in any concern that is a competitor of CREX, a supplier or dealer for CREX, or is involved in a joint venture with CREX.

13. Protection and Proper Use of Company Assets. Theft, carelessness, and waste have a direct impact on CREX's profitability. All employees and directors will take appropriate actions to protect CREX's assets and ensure their efficient use for legitimate business purposes.