

CODE OF CONDUCT AND ETHICS

Amended and restated on October 8, 2023

Introduction

Cricut, Inc. is committed to conducting business with the highest standards of business ethics. The actions of Cricut employees reflect on the Company and its reputation. That reputation must be safeguarded as the Company's most valuable asset. When customers, suppliers, vendors, and the public at large hear the name "Cricut" they should associate it with integrity and honesty. We do not compromise our standards and ethics in the name of making a sale, hitting a number, or other business pressures that come to bear on the Company. We believe that when Cricut lives up to its high ethical standards, ultimately, its competitive position in the marketplace is improved.

This Code of Business Conduct and Ethics (the "Code") describes the core values and beliefs of the Company and provides the foundation for all business conduct. It also addresses specific areas where the Company must comply with laws or regulations. Our guidelines for conducting Company business are consistent with the highest standards of business ethics. If you have any questions about these guidelines, please contact the Legal Department.

This Code applies to all our directors, officers, employees, and agents, whether they work for Cricut on a full-time, part-time, consultative, or temporary basis. We refer to all persons covered by this Code as "employees."

The Company has appointed the General Counsel as its primary compliance officer. In cooperation with the General Counsel, supervisors and department heads are responsible to see that employees understand this Code and how to comply with it.

All Cricut employees have a duty to report any known or suspected violation of this Code, including any violation of laws, rules, regulations, or policies that apply to Cricut. Reporting a known or suspected violation of this Code by others will not be considered an act of disloyalty, but an action to safeguard the reputation and integrity of Cricut and its employees.

Management Responsibilities

Employees who supervise others have an important responsibility to lead by example and maintain the highest standards of behavior. If you supervise others, you should create an environment where employees understand their responsibilities and feel comfortable raising issues and concerns without fear of retaliation. If an issue is raised, you must take prompt action to address the concerns and correct problems that arise, and/or report the issue to the proper functions in the Company.

You must also make sure that each employee under your supervision understands our Code and the policies (such as those found in the UKG Pro (Formally UltiPro), laws and regulations that affect our workplace. Most importantly, you must ensure that employees understand that business performance is never more important than ethical business conduct.

Employee Responsibilities

Recognizing ethical issues and doing the right thing in all Cricut business activities is your responsibility.

Make Ethical Decisions

When engaging in business activities for the Company, consider the following:

- What feels right or wrong about the planned action?
Is the planned action consistent with the Code and other Company policies?
- How will the planned action appear to your manager, Company executives, the Cricut Board, or the public?
- Would another person's input help to evaluate the planned action?

Compliance with the Law

We play by the rules. We intend to conduct our business in compliance with applicable national, state, and local laws, regulations, and accepted ethical business practices wherever Cricut conducts business around the world. You have a responsibility to acquire appropriate knowledge of and comply with the laws and regulations that apply to your job and your area of responsibility.

Employees should not take any action on behalf of the Company that they know, or reasonably should know, violates any law or regulation. If you have questions regarding the application of laws or regulations, contact the Legal Department. If you are advised that an action or inaction would constitute a violation of law or regulation, you are expected to follow the advice of legal counsel. It is Cricut's policy that each employee act in a manner consistent with good judgment, high ethical standards, and honesty in their business dealings on behalf of the Company.

Equal Opportunity

Concern for the personal dignity and individual worth of every person is an indispensable element in the standard of conduct that we have set for ourselves. The Company affords equal employment opportunity to all qualified persons without regard to any impermissible criterion or circumstance. This means equal opportunity regarding everyone's terms and conditions of employment and regarding any other matter that affects, in any way, the working environment of the employee. We do not tolerate or condone any type of discrimination prohibited by law, including harassment.

Harassment

Cricut complies with Federal, State, and local laws that pertain to harassment and discrimination in the workplace. Please see the Employment Policies section of this Cricut Employee Handbook for details regarding harassment, and what to do if you are harassed or if you become aware that an employee is being harassed. In short, Cricut will not tolerate harassment in the workplace. Every employee deserves the opportunity to have a work environment where they can succeed and not be exposed to inappropriate comments or actions.

Harassment or discrimination based on race, color, national origin, sex/gender, age (forty and older), religion, disability, veteran status, military service, sexual orientation or any other class or group protected under federal, state, or local laws is illegal and must be reported to the Company.

Discrimination based on any of these criteria or any other criteria protected under federal, state, or local laws is prohibited in all aspects of employment including, but not limited to, hiring, compensation, training, promotions, and benefits. In addition, as set forth in further details in the Employment Policies section of this Cricut Employee Handbook, as required by applicable law, Cricut will reasonably accommodate religious practices and qualified individuals with disabilities where the accommodation does not pose an undue hardship.

Retaliation against any applicant or employee who exercises their rights in good faith relating to any of the above-listed discrimination, harassment or accommodation issues is strictly prohibited.

Employee Privacy

We respect the privacy of our employees and our Consumers and will protect personal and confidential information that we are required to obtain for operating or legal purposes. Access to personal employee information, such as personnel information and medical records, is strictly limited by company policy and government privacy laws and regulations. You may have the right to access your own personnel or medical information, but you may not access or use the employee records of others unless authorized to do so. While we respect employees' privacy, we reserve the right to inspect our facilities and property, such as computers, telephone records, lockers, e-mails, files, business documents and workplaces including anything brought on company property. Employees should not expect privacy when using company-provided services or equipment.

Conflicts of Interest

Employees should avoid conflicts of interest that occur when their personal interests may interfere in any way with the performance of their duties or the best interests of Cricut. We expect our employees to be free from influences that conflict with the best interests of Cricut or might deprive Cricut of their undivided loyalty in business dealings. Whether or not a conflict of interest exists or will exist can be unclear. Conflicts of interest are prohibited unless specifically authorized as described below.

If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, and you are not an officer or director of Cricut, you should discuss the matter with your supervisor, Human Resources or the General Counsel. Supervisors may not authorize conflict of interest matters or make determinations as to whether a problematic conflict of interest exists without first consulting Human Resources or the General Counsel. If the supervisor is involved in the potential or actual conflict, you should discuss the matter directly with Human Resources or the General Counsel.

Factors that may be considered in evaluating a potential conflict of interest are, among others:

- Whether it may interfere with the employee's job performance, responsibilities or morale;
- Whether the employee has access to confidential information;
- Whether it may interfere with the job performance, responsibilities or morale of others within the organization;
- Any potential adverse or beneficial impact on our business;
- Any potential adverse or beneficial impact on our relationships with our customers or suppliers or other service providers;
- Whether it would enhance or support a competitor's position;
- The extent to which it would result in financial or other benefit (direct or indirect) to the employee;
- The extent to which it would result in financial or other benefit (direct or indirect) to one of our customers, suppliers, or other service providers; and
- The extent to which it would appear improper to an outside observer.

Although no list can include every possible situation in which a conflict of interest could arise, the following are examples of situations that may, depending on the facts and circumstances, involve problematic conflicts of interests:

- Employment by (including consulting for) or service on the board of a competitor, customer or supplier or other service provider.
- Owning, directly or indirectly, a significant financial interest in any entity that does business seeks to do business or competes with us.
- Soliciting or accepting gifts, favors, loans or preferential treatment from any person or entity that does business or seeks to do business with us.

- Soliciting contributions to any charity or for any political candidate from any person or entity that does business or seeks to do business with us.
- Taking personal advantage of corporate opportunities.
- Conducting our business transactions with your family member or a business in which you have a significant financial interest.
- Exercising supervisory or other authority on behalf of Cricut over a co-worker who is also a family member?

Gifts and Entertainment

Gifts and entertainment can create goodwill in our business relationships but can also make it hard to be objective about the person providing them. Our choice of suppliers, vendors and partners must be based on objective factors like cost, quality, value, service, and ability to deliver. We must avoid even the appearance of making business decisions based on gifts received through these relationships. Gifts of nominal value (less than \$100.00 from all sources in a year) are acceptable if your department does not have a more stringent gift policy. Infrequent business entertainment is appropriate provided it is not excessive, and it does not create the appearance of impropriety.

When giving gifts or offering to entertain a business partner, ensure that your offer does not violate the recipient's own policies. If you work with public officials, be aware that even simple offers such as purchasing a meal or refreshments may be unacceptable or even against the law. Contact the Legal department before providing any gift or entertainment to a public official (U.S. or otherwise).

Outside Activities

You must not work for another organization while employed by Cricut if it creates a conflict of interest or if such employment interferes in any way with your responsibilities as a Cricut employee. You must disclose all proposed or existing outside positions or other employment to Human Resources, which will take steps to determine if a conflict exists. If one does exist, you will not be permitted to accept, or continue in, that position or employment. This does not apply to charitable, civic, religious, educational, public, political, or social organizations, or to residential boards whose activities do not conflict with the Company's interests and do not impose excessive demands on your time.

You also may not invest or participate in any partnership or other business arrangement that acquires assets from, or provides services to, the Company. If you have an investment in an entity that is considering such a relationship with Cricut, you must notify Human Resources.

You may join industry or trade associations with the approval of your supervisor (unless applicable law prohibits the company from requiring approval first). However, you should ensure that your work within those organizations is consistent with the Company's interests. There may be a conflict of interest if an immediate family or household member is employed by a competitor, supplier, or customer of Cricut. This circumstance must be reviewed by Human Resources.

You also must disclose to the General Counsel if any member of your immediate family or household holds a position with a company that directly competes or does business with Cricut, and that person can influence strategic decisions or interacts with individuals in senior positions at that company. These situations require review by the General Counsel, who will consider your position with Cricut in determining if an actual conflict exists. If one does exist, the General Counsel will work with you to resolve the conflict.

Business Opportunities

In carrying out their duties and responsibilities, employees, officers, and directors should endeavor to advance the legitimate interests of the Company when opportunities arise. Employees, officers, and directors should avoid:

- Taking for themselves personal opportunities that are discovered in carrying out their duties and responsibilities to Cricut;
- Using Company property or information, or their position as employees, officers or directors, for personal gain; and
- Competing with the Company, in each of the foregoing cases, to the material detriment of the Company.

Whether any of the foregoing actions is to the material detriment of the Company will be determined based upon a review by the General Counsel.

Investments

Generally, you may invest in the shares of publicly traded companies. Investments in private entities also are allowed, except where the entity competes with, does business with or is seeking business with the Company. Neither you nor members of your immediate family or household may make or hold a significant investment in any private entity that competes with, does business with or is seeking to do business with the Company without the approval of the General Counsel. An interest is considered significant if it could impair, or reasonably appear to impair, your ability to act solely in the best interests of Cricut.

Customer Relationships

We have a responsibility under data privacy laws and regulations to protect customer and consumer information that is provided to us. If you do not have a business reason to access this information, you must not do so. If you do, you must also take steps to protect the information against unauthorized use or release. Vendors or other outside parties who have authorized access to this information are also responsible for protecting this information and should be monitored for compliance.

Government Relationships

We strive to develop and maintain relationships with elected and appointed public officials and government agencies. We respond to appropriate government requests for information relating to taxation, licensing, occupational safety and health, labor practices, and all other regulated areas.

You should not represent the company or company views on legislative, regulatory or policy issues unless you have approval in advance from the CEO, in consultation with the General Counsel. Any contact with government for the purpose of influencing legislation, regulations or decision-making may constitute lobbying and may require special registrations or disclosures. Prior to contacting a government official employee should consult with the General Counsel.

FCPA (Foreign Corrupt Practices Act, and United Kingdom Bribery Act)

The Company has adopted an FCPA and UKBA policy and is committed to complying with the standards of the Acts and the Company's policies. Employees are responsible for understanding and complying with the policy. Questions regarding the policy should be directed to the Legal Department.

Improper Payments and Bribes

Employees are prohibited from making unlawful, improper, or other kinds of questionable payments to suppliers, customers, service providers, government employees or officials, or other parties, or to receive any such payments. We do business and sell our products on the merits of price, quality, and service.

We will not offer expensive gifts, bribes or any other kind of payment or benefit to representatives of customers, suppliers, competitors, government, or governmental agencies. This applies to any individual or organization at any level, within or outside of the U.S. We expect our employees to refuse to make questionable payments. In cases where the propriety of a payment is not clear, or the alternatives might be harmful to the Company or employee, the matter should be approved in advance by the General Counsel. Our policy on questionable payments includes not only direct actions of Cricut employees, but also forbids indirect actions by agents, contractors, distributors, representatives, joint venture partners, or third parties acting on Cricut's behalf. Ignoring activity that appears to be questionable is also a violation of Cricut policy and, in some cases, the law.

Money Laundering

We take affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery, and fraud. Anti-money laundering laws of the United States and other countries and international organizations require transparency of payments and the identity of all parties to transactions. Cricut is committed to full compliance with anti-money laundering laws throughout the world and will conduct business only with reputable customers involved in legitimate business activities and transactions. Each employee is responsible to understand the flow of money within his/her sphere of responsibility and to report suspicious activity.

Proprietary and Confidential Information

One of our most important assets is our confidential information. As an employee of Cricut, you will likely learn of information about Cricut that is confidential and proprietary. You also may learn of information before that information is released to the public. Employees who have received or have access to confidential information must take care to keep this information confidential.

Confidential information includes non-public information that might be of use to competitors or harmful to Cricut or its customers if disclosed, such as business, marketing and service plans, financial information, product architecture, source codes, engineering and manufacturing ideas, designs, databases, timing of sales, customer lists, pricing strategies, personnel data, personally identifiable information pertaining to our employees, employee travel plans, customers or other individuals (including, for example, names, addresses, telephone numbers and social security numbers), and similar types of information provided to us by our customers, suppliers and partners.

You are expected to keep confidential and proprietary information confidential unless and until that information is released to the public through approved channels. Vendors and customers are required to sign non-disclosure agreements prior to the disclosure of any of the above-described confidential information. Every employee has a duty to refrain from disclosing to any person confidential or proprietary information about us or any other company learned in the course of employment here, until that information is disclosed to the public through approved channels.

This policy requires you to refrain from discussing confidential or proprietary information with outsiders and even with other Cricut employees, unless those fellow employees have a legitimate need to know the information in order to perform their job duties, and the appropriate non-disclosure agreements are in place.

You should also take care not to inadvertently disclose confidential information. Materials that contain confidential information, such as memos, notebooks, computer disks and laptop computers, should be stored securely. Unauthorized posting or discussion of any information concerning our business,

information or prospects on the Internet is prohibited. You may not discuss our business, information or prospects in any “chat room,” regardless of whether you use your own name or a pseudonym and should carefully follow the Cricut Social Media Policy which can be found in the Information Security Policy. All Cricut emails, voicemails and other communications are presumed confidential and should not be forwarded or otherwise disseminated outside of Cricut, except where required for legitimate business purposes.

This policy does not prohibit employees from confidentially disclosing trade secret, proprietary or confidential information to federal, state and local government officials, or to an attorney, when done to report or investigate a suspected violation of the law. Employees may also disclose the information in certain court proceedings if specific procedures to protect the information are followed. Nothing in this policy is intended to conflict with 18 U.S.C. sec. 1833(b) or create liability for disclosures of trade secrets that are expressly allowed by 18 U.S.C. sec. 1833(b).

Nothing in this policy prevents you from discussing or disclosing information about unlawful acts in the workplace, such as harassment or discrimination or any other conduct that you have reason to believe is unlawful.

Intellectual Property

Cricut values new product and business ideas, concepts, and other information we produce. When we do not identify or otherwise protect this “intellectual property,” Cricut risks losing rights to it and the competitive advantages it offers.

Protect Cricut’s intellectual property rights by avoiding any inappropriate or unauthorized disclosures. Protect intellectual property from illegal or other misuse by making sure it is affixed with or identified by appropriate trademark, service mark, copyright notice or patent marking. Disclose to the Legal Department any innovation developed on company time or using company information or resources, so that the company can decide whether to seek formal protection.

Protecting the Intellectual Property of Others

You must obtain a license to use intellectual property belonging to someone else or we must purchase the outright ownership of the property. In the case of property rights with an expiration date, such as patents, you must be sure that this date has passed if licensing or outright purchase is not feasible. Respect the intellectual property rights of others.

Do not:

- Utilize product concepts that are not properly licensed to, or owned by Cricut;
- Make unauthorized copies of software;
- Photocopy magazine/journal articles or other publications unless you have the authority or license to do so;
- Hire a competitor’s employee to obtain that competitor’s trade secrets;
- Affix the trademark of another company to goods without authorization;
- Fail to remove another’s trademark when the goods or parts are remanufactured;
- Erroneously allege patent infringement or mark a product with an untrue patent notice.

Company Assets and Resources

As employees of Cricut, each of us is a steward of its assets. Employees have the obligation to (a) protect and preserve the Company’s assets and resources and ensure their efficient use and (b) assist the Company in its efforts to control costs. Theft, carelessness, and waste have a direct impact on the Company’s profitability.

Company assets include, but are not limited to, such things as electronic mail, computer systems, documents, equipment, facilities, information, the Company's logo and name, materials, and supplies. Any use of these assets for purposes other than the discharge of Company business is to be avoided. Moreover, the use of the Company's assets and resources for personal financial gain is strictly prohibited.

The following examples are provided as illustrative of misuse and unreasonableness:

- Use of Company facilities for personal gain;
- The excessive use of the telephone or facsimile long-distance for personal purposes;
- The taking of office supplies or equipment for personal consumption or use at home, eg., using Company equipment to repair personal property;
- The personal use of Company vehicles without express authorization;
- Excessive spending while traveling; and
- The unauthorized copying of computer software programs.

Business Records

Cricut's policy is to retain its records in accordance with its Document Retention & Destruction Policy. Records are kept only for as long as the records are being actively used unless the law or business needs require longer retention. This policy applies to records maintained in all forms by the Company, including records kept in written and electronic form.

If you are responsible for preparing or maintaining any Cricut records, please remember (and this list is not exhaustive):

- Records must always be prepared accurately and reliably and stored properly in accordance with the company's record retention policy;
- Records must accurately and fairly reflect, within Cricut's normal accounting systems, all required transactions and other events;
- Transactions must be recorded so that proper financial statements may be prepared and in a manner that ensures accountability for Cricut assets and activities. If you need to dispose of corporate assets, please consult with the Accounting department for information on the correct procedures; and
- There cannot be any unrecorded company funds, assets or any other type of "off the books" accounts, no matter what the reason for such accounts.

We do not knowingly destroy or discard evidence. Records relevant to a legal action cannot be destroyed or discarded without the approval of the Legal Department. If Cricut receives a subpoena, a request for records or other legal papers or if we have reason to believe that such a request or demand is likely, the company policy is to retain all records which are relevant to the matter. If you receive such a request or other legal papers, notify the Legal Department immediately.

E-mail and the Internet

Cricut has specific requirements concerning employee use of company e-mail, the Internet, company intranet and other electronic information sources while on company time or using company computers. All data stored on Cricut's computers, including e-mail sent or received on the Cricut network, is company property and is not private, except as required by local law. Employees are not allowed to use company resources to send, receive, access, or save electronic information that is sexually explicit, or promotes hate, violence, gambling, illegal drugs, or the illegal purchase or use of weapons. Employees must also not install or use computer files or software not licensed by the company or approved by management or use approved software in a way that goes against the license or copyright agreement.

Commitment to Fair Competition

Cricut must operate at the highest levels of integrity, even in a highly competitive field. We strongly believe a company can successfully market and sell its products based on fair, ethical and legal business conduct. When we compete for business, we:

- Make only fact-based claims about our competitors' products and services, and our own.
- Honor the confidentiality of our competitors' trade secrets.
- Earn our customers' business because of the quality, value and price of our products, and our superior marketing and sales abilities.

Gathering Competitive Information

Learning about our competitors is good business practice, but it must be done fairly and ethically and in compliance with all laws and regulations in the U.S. and abroad. Cricut employees should seek competitive information only when there is a reasonable belief that both the receipt and the use of the information are lawful and ethical. Competitive information includes anything related to the competitive environment or to a competitor's products, services, markets, pricing or business plans. Legitimate sources of competitive information include publicly available information such as news accounts, industry surveys, competitors' displays at conferences and trade shows, and information publicly available on the Internet. You may also gain competitive information volunteered by customers and suppliers (unless they are prohibited from sharing the information) and by obtaining a license to use the information or purchasing the ownership of the information.

Never seek or use the following competitive information:

- Information obtained by unethical or illegal means including theft, bribery, eavesdropping, or unauthorized tape-recording of a customer or supplier;
- Information obtained through misrepresenting your identity as a Cricut employee or violating a competitor's terms of use;
- Information actively solicited from customers or suppliers (if customers or suppliers volunteer information to you, that is acceptable);
- Proprietary information that has been copied, drawn or photographed;
- Information obtained in exchange for compensation, employment considerations, gifts or anything else of value;
- Information about a former employer solicited from a new hire; or
- Information containing technical or engineering data that may be protected by trade secret laws.

Antitrust

The antitrust laws of the United States are intended to promote vigorous competition in a free market. It is in Cricut's best interest to promote free and open competition. Cricut must make its own business decisions, free from understandings or agreements with competitors that restrict competition. While it is beyond the scope of this policy to explain the antitrust laws in detail, Cricut considers compliance with these laws of vital importance. The principles set out below must be observed by each employee conducting business on behalf of Cricut.

The following types of conduct are prohibited under the antitrust laws:

- Agreements or understandings with competitors, whether written or not, on such matters as prices, terms or conditions of sale, limits on production, division of territories or customers, and boycotting of third parties not only are bad business practices, but violate the antitrust laws and may even be criminal violations. As a result, they cannot be defended or justified no matter how well intended.

- Sharing competitively sensitive information (such as prices, terms of sale, output, strategic and market plans, and customer lists) with a competitor is also a violation of the antitrust laws. Cricut employees should not share competitively sensitive information with, or try to obtain competitively sensitive information from, Cricut's competitors.
- The antitrust laws apply to employee hiring and compensation. Cricut employees responsible for hiring must avoid engaging in "no-poach" agreements (where employers agree not to solicit or hire employees from one another) or "wage-fixing" agreements (where employers agree to fix or limit employee salary, benefits, or other compensation).

The following types of arrangements may raise antitrust issues and should not be entered into without the prior review and approval of Cricut's Legal Department:

- **Exclusive dealing:** requiring a customer to deal exclusively with Cricut for a particular product or service.
- **Tying and bundling:** requiring a customer to buy one product as a condition of purchasing another product, or offering discounts or rebates contingent on the customer's purchase of two or more different products.
- **Territorial or customer channel restrictions:** restrictions on the territory in which a customer may resell Cricut products, or restrictions on the category of end consumer a customer may resell to (such as restrictions on reselling through third-party online marketplaces, or restrictions on selling to commercial customers).
- **Resale price maintenance:** agreements or understandings with resellers regarding the price the reseller can charge for a Cricut product.
- **Price discrimination:** selling the same goods to similarly situated customers in similar volumes, but at different prices. All pricing structures, rebates, commissions, and other forms of support should be evaluated to ensure compliance with the law.

When in doubt about compliance with the antitrust laws, employees should seek the advice of Cricut's Legal Department. In conducting Cricut business, each employee must:

- Compete vigorously and ethically;
- Treat all suppliers objectively, honestly and fairly;
- Not discuss pricing, production, business plans, markets, or other competitively sensitive information with competitors or competing customers;
- Not discuss employee hiring or compensation with other companies that may compete to hire the same employees;
- Not inappropriately set resale prices with customers or suppliers;
- Avoid any practice that could be characterized as unfair or deceptive and always present Cricut services and products in an honest manner.
- Never act in a manner which could be interpreted to exclude present or potential competitors or to unduly control market prices; and
- Make clear to all suppliers and potential suppliers that Cricut expects them to compete fairly and vigorously for Cricut business and Cricut will select its suppliers using high business and ethical standards.

Fair Purchasing

Base all procurement decisions on the best value received by Cricut. Base the purchase of goods and services only on the merits of price, quality, performance, and suitability. Good procurement conduct includes the following:

- Use established corporate-wide or regional supply (leveraged) agreements.
- Obtain competitive bids when leveraged agreements do not exist.
- Confirm the financial and legal status of the supplier.

- Verify quality and service claims on a regular basis.
- Make sure that purchase agreements clearly state the services or products to be provided, the basis for earning payment and the applicable rate or fee.
- Verify that invoices clearly and fairly represent goods and services provided.
- Avoid reciprocal agreements or exchange of favors.

The fee or price paid for goods and services by Cricut must represent the value of the goods or services provided. Payments can only be made to the person or the firm that actually provides the goods or services, and must be made in the supplier's home country, where it does business, or where the goods were sold or services provided, unless approval is obtained from legal counsel. Suppliers should be evaluated for compliance with Cricut's Manufacturer's Code of Conduct. Cricut will not knowingly use suppliers who participate in the following activities:

- Supply unsafe products or services.
- Break laws or regulations.
- Use child labor or forced labor.
- Use physical punishment to discipline employees, even if it is allowed by local law.

Sales and Advertising

In all sales and advertising, Cricut competes on the merits of our products and services. Our communications with our customers or potential customers must be truthful and accurate. When we say something about our products and services, we must be able to substantiate it. We sell the quality of what we do; we do not disparage or take shots at our competitors. If you are involved in advertising, be sure that Product Development and the Legal department reviews any advertising material before it is used.

Accurate Reporting

Investors count on Cricut to use and provide accurate information so they can make good decisions. All Cricut employees must properly record many kinds of business information. All financial books, records, and accounts must correctly reflect transactions and events. These records must also meet both Generally Accepted Accounting Principles (GAAP) and Cricut's system of internal controls. The following are examples of activities not allowed:

- Not recording or disclosing funds or assets that should be recorded.
- Making false claims on an expense report, time sheet or any other report.
- Giving false quality or safety results.
- Recording false sales or recording sales outside of the period they occurred.
- Failing to report an entitlement, rebate, or promised return.
- Understating or overstating known liabilities and assets.
- Delaying the entry of items that should be current expenses.
- Hiding the true nature of any transaction.
- Providing inaccurate or misleading information for company benefit programs.

Be sure that any document you prepare, or sign is correct, truthful and complies with Cricut's Authorized Signature Policy.

Public Disclosures

All information disclosed outside of the company (for example, to the media, investors, or the general public) must be accurate, complete and consistent, and disseminated in a manner intended to ensure broad and contemporaneous distribution. We all represent Cricut; if someone asks you for information, follow these guidelines, and remember to be polite and courteous.

If you are asked to provide information about Cricut or its business activities, please refer the requesting party to the General Counsel. Do not attempt to answer these questions yourself. Be sure to advise your manager of the request.

If a member of the media, or someone else, appears unexpectedly at a Cricut location and asks to shoot video, take photographs, or makes other inquiries, immediately notify your manager. Only specifically authorized employees may speak on behalf of Cricut.

Charitable Contributions

Cricut supports community development through charitable contributions. Cricut employees may contribute to these efforts or may choose to contribute to organizations of their own choice. However, employees may not use Company resources to personally support charitable or other non-profit institutions not specifically sanctioned or supported by the Company. You should consult the Legal Department if you have questions about permissible use of Company resources.

Complying with the Code of Conduct

Cricut will not tolerate violation or circumvention of any laws of the U.S. or a foreign country by an employee during the course of employment or by any agent or representative acting on the Company's behalf, nor will Cricut tolerate the disregard or circumvention of Company policies or the engagement in unethical dealings in connection with the Company's business.

Employees who fail to comply with this Code or to cooperate with any investigation will be subject to disciplinary action. In addition, any supervisor, manager, or officer who directs, approves, or condones infractions, or has knowledge of them and does not act promptly to report and correct them in accordance with this Code, will be subject to disciplinary action. Disciplinary action may include termination, referral for criminal prosecution, and reimbursement to the Company or others for any losses or damages resulting from the violation. If the reporting Employee is involved in the Code of Conduct violation, the fact that the Employee reported the violation will be given consideration by the Company in any resulting disciplinary action.

Whistleblower

"Whistleblower" is defined by this policy as an employee who reports, to one or more of the parties specified in this policy, an activity that they consider to be illegal, dishonest, unethical, or otherwise improper. You are responsible for reporting any conduct that appears to be unethical or illegal or that appears to violate the Code or Cricut policies. Employees should never speak to media representatives regarding potential violations of the Code or Company policies. Conduct that appears to raise concerns about financial or audit matters should be reported by complying with Cricut's Reporting Policy.

Any conduct that appears to raise concerns about matters other than financial or audit, such as harassment or discrimination, or questionable ethical conduct, should be raised with your manager, General Counsel, or if you want to report anonymously, you may do so using one of the following methods:

- Website: www.lighthouse-services.com/cricut
- Toll-Free Telephone:
 - English speaking USA and Canada: 833-270-0006
 - Spanish speaking USA and Canada: 800-216-1288
 - French speaking Canada: 855-725-0002
 - Spanish speaking Mexico: 01-800-681-5340
 - All other countries: 800-603-2869 (must dial country access code first)

- Email: reports@lighthouse-servies.com (must include company name with report)

All employees are expected to cooperate with an investigation, refrain from interfering with an investigation, and not attempt to discover the identity of anyone related to the matters under investigation.

Cricut prohibits retaliation, in any form, against anyone who, in good faith, reports violations or suspected violations of this Code, Cricut policy, or applicable law, or who assists in the investigation of a reported violation. Acts of retaliation should be reported immediately to your manager, HR, or the General Counsel.

Solicitations & Distribution Policy

In an effort to protect employees from unwanted solicitations that can interfere with work duties and productivity or create tension and discord among employees, the following rules will apply to all of our staff.

- Employees may not solicit or ask other employees to purchase goods or services, make donations or contributions, sign petitions, or join or support particular groups or causes in any work areas during work time.
- Employees may not distribute any literature or written materials that are not job related and approved by management at any time in any work areas.

Management may make occasional exceptions to the above rules for certain charitable or other Company-sponsored activities.

Anyone who is not an employee is prohibited from entering our premises at any time to solicit support from our employees for any organization or cause; or to otherwise proselytize, distribute literature, or sell or market products/services to our staff. Exceptions to this important rule may be made only for vendors or service representatives whose purpose is strictly related to our business functions and purposes, and then only with prior approval of our management.

Utah Employment Selection Procedure

Cricut complies with the Utah Employment Selection Procedure Act.