



# Code of Conduct

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2026



STRONGER TOGETHER

Associates,

At Catalyst Brands, integrity is at the heart of everything we do. As we share this year's *Annual Code of Conduct*, I want to reaffirm our commitment to conducting business with honesty, transparency, and respect for the communities we serve.



Your hard work and dedication are critical to helping us deliver on our strategic purpose: to ignite America's most beloved retail brands to make fashion accessible to all. Our *Code of Conduct* guides us in making informed decisions and acting on those decisions with integrity, honesty and fairness. That's why I'm asking each of you to take a moment to read the Code of Conduct, understand what it means, and apply it consistently across every area of the business.

The Code of Conduct is a resource to help ensure we all follow the same principles and understand how we successfully conduct business day by day. Whether you need to report a concern about a possible violation of ethics, law, or company policy, or if you find yourself in a position where you are unsure about how to proceed, the Code of Conduct outlines the resources available and where to turn for guidance.

Over the past year, we have worked hard to build momentum across our portfolio of brands, and it's up to each of us to hold ourselves accountable and protect the rich legacy and heritage of our brands. Every member of our leadership team is committed to upholding Catalyst Brands' reputation to the highest standards of integrity, and we expect the same from each one of you. Integrity starts with us.

Thank you for your continued commitment to ensure that each of our brands remains respected, ethical, and successful.

**Marc Rosen**

A handwritten signature in black ink, appearing to read 'Marc Rosen'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Chief Executive Officer  
Catalyst Brands



# STRONGER TOGETHER

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## Our Commitment

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Ethical behavior is at the core of who we are at Catalyst Brands (“Catalyst”). We are “**Stronger Together**” when we lift each other up – because when we act with integrity and respect, we elevate our work, our customers, and our brands.

Our customers, partners, and communities trust us to uphold the highest ethical standards. This Code of Conduct provides the framework for how we do that—by guiding our decisions and helping us act with honesty and integrity in every situation.

As a Catalyst Associate, you are expected to:

- Read, acknowledge, and understand this Code of Conduct.
- Act ethically and comply with all laws, regulations, and Company policies.
- Speak up and report possible violations of Company policies, the law, regulations, or the Code of Conduct.
- Cooperate fully in investigations or audits.

As a Manager, you are expected to:

- Lead by example and model ethical behavior.
- Promote a respectful, inclusive environment.
- Encourage open communication and make it safe for associates to speak up.
- Listen and respond quickly to concerns, reporting potential issues to Legal, leadership, or the Catalyst Hotline.
- Prevent retaliation against anyone who raises a concern or participates in an investigation.
- Apply policies consistently and hold associates accountable for their conduct.



## Getting Help – Raising Concerns

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At Catalyst, integrity starts with open communication. Each of us must speak up if something doesn’t seem right. Staying silent can harm you, your co-workers, and the Company.

Use good judgment and report any known or suspected violations of the Code of Conduct, Company policies, or the law. For questions about laws or regulations, contact the Legal Department.

The Code is not a comprehensive rulebook and can’t cover every situation. If you’re unsure what to do, ask. You can raise a concern at any level, but starting with your manager is usually the best first step. If your manager cannot answer your question, you can reach out to [Human Resources](#), [Asset Protection](#), [ethics-sm@catalystbrands.com](mailto:ethics-sm@catalystbrands.com) or [Legal](#).

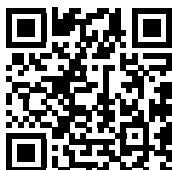
## Catalyst Brands Hotline

The Catalyst Hotline is available 24/7 to report concerns about ethics, legal compliance, associate relations, accounting, asset protection, safety, or environmental issues. It is managed by an independent organization, not by Catalyst Brands.

You can contact the Hotline toll-free at 1-800-527-0063 or submit a report online through the [Catalyst Hotline portal](#). Associates outside the U.S. can use a local international number, available in the country directory on the Hotline site. Interpreter services are also available in multiple languages.

When reporting a concern, provide as much detail as possible to help the Company investigate and respond effectively. If you choose, you may remain anonymous.

When you call, an independent operator will ask questions to understand your concern and provide a case number so you can follow up. The information is then forwarded to the appropriate Catalyst department for review. All concerns are investigated promptly and handled as confidentially as possible.



Point your smartphone camera at this QR code, then tap the pop-up notification to go to the hotline website.



## No Retaliation For Raising Good Faith Concerns

Catalyst has a strict policy against retaliation. Associates who have made a good faith report will not be subject to any adverse action or consequences. Retaliation is not tolerated at Catalyst Brands so do not hesitate to raise possible legal, ethical or Catalyst policy violations.

**Question:** What does reporting a concern in good faith mean?

**Answer:** Good faith means sharing a concern where you honestly believe there may be a violation of our Code, our policies, or the law.

**Question:** I saw a co-worker doing something that seemed unethical, but I'm afraid to report it. Could it cause problems for me or hurt our reputations?

**Answer:** No. If you report a concern in good faith, Catalyst will not retaliate against you. Your report will be handled confidentially, investigated promptly, and if misconduct is found, it will be addressed appropriately. Everyone is accountable for acting with integrity and upholding Catalyst's values.



## Diversity, Inclusion and Equal Opportunity

At Catalyst, everyone deserves to be treated with respect, fairness, and dignity. We're committed to creating a workplace where associates from all backgrounds feel welcomed, valued, and supported.

We make employment decisions based on skills, performance, and business needs—**never** on personal traits or backgrounds. This includes race, color, religion, ethnicity, national origin, sex, sexual orientation, gender identity or

expression, marital or family status, military or veteran status, age, citizenship, immigration status, disability, pregnancy, genetic information, or any other status protected by law (collectively referred to as “Protected Status”).

Discrimination, harassment, or retaliation of any kind are not tolerated at Catalyst Brands.

**Question:** What is harassment?

**Answer:** Harassment is unwelcome conduct based on a person’s Protected Status. It can include verbal, physical, or digital behavior and is prohibited whether it happens on or off the clock, on or off Company property, or involves associates, customers, or suppliers. Catalyst forbids all forms of harassment or bullying, even if the conduct is not severe enough to be illegal.

**Question:** What is discrimination?

**Answer:** Discrimination means treating someone unfairly because of their Protected Status. Catalyst prohibits discrimination in all employment practices, including hiring, pay, benefits, promotions, training, discipline, and access to facilities.

**Question:** I feel that I’m being discriminated against by my manager. What do I do?

**Answer:** You deserve a workplace free from discrimination, harassment, and retaliation. If you experience or witness such behavior, you can speak with your manager’s manager, Human Resources, or report it through the Catalyst Hotline.

## Working Remotely

Catalyst recognizes that associates are designated as remote, hybrid, or in-person. To comply with tax, employment, and other legal requirements, associates must accurately report their work location. For more information on expectations related to where and how you work, see the [Work Location Policy](#).

## Conflicts of Interest

Catalyst expects all associates to act in the best interests of the Company and avoid situations where personal interests could interfere—or appear to interfere—with their work responsibilities. Associates should remain aware of potential conflicts, including personal relationships, outside activities, or financial interests that could influence—or seem to influence—their judgment or decisions at work.

If you believe an actual or potential conflict may exist, promptly notify your manager and make a full and timely disclosure through My Kiosk. Provide all relevant facts, even if you are unsure whether a conflict truly exists. The Company—not the associate—will determine whether a conflict or the appearance of one is present.

No further action should be taken until you receive approval from the Ethics and Compliance Office. For additional guidance on identifying or reporting conflicts, [click here](#).



**Question:** Can I work for JCPenney’s photo studio (Lifetouch) or JCPenney Optical (U.S. Vision) and also at a JCPenney store?

**Answer:** No. Associates may not be co-employed at the same location by JCPenney and one of its vendors, such as Lifetouch or U.S. Vision, as this creates a conflict of interest. For other Catalyst vendors, you must disclose the second job before starting so the Company can decide if a conflict exists. Generally, there is no conflict if a non-management associate takes a non-management role with a vendor that has no decision-making authority over Catalyst business.

**Question:** May I serve on the board of another company or organization?

**Answer:** Possibly. You must tell your manager, make a [disclosure](#) through My Kiosk, and wait for approval before accepting any board position.

**Question:** I want to work part-time at another department store on weekends. Is that allowed?

**Answer:** It depends. Before starting, disclose the job through My Kiosk and wait for a response.

**Question:** I’m a full-time Corporate Office associate who works remotely. Do I need approval for a second job?

**Answer:** Yes. Disclose the job and get approval before beginning work elsewhere whether you work remote or hybrid. Outside employment may be a conflict if it interferes with your Catalyst duties or involves a competitor.

**Question:** Can I work at a JCPenney store and also at a Lucky Brand store?

**Answer:** Possibly. Associates should check with their manager for guidance on any dual-employment requests as we continue working to establish the appropriate process.

## Family

Catalyst aims to prevent situations where personal relationships could create a conflict of interest or the appearance of one.

You should never use your position to benefit a relative or influence their employment or business with Catalyst. You also shouldn’t make or influence decisions involving a company or organization where a relative has a personal or business interest.

It is **your responsibility to promptly disclose** any relationship that could create, or appear to create, a conflict of interest. Relatives of associates in leadership positions may not sell or seek to sell goods or services to Catalyst unless the relationship has been disclosed and approved in advance by the Ethics and Compliance Office.

For more information, see the [Employment of Relatives & Fraternization Policy](#).

## Gifts, Meals, and Entertainment

Catalyst builds business relationships with trust and integrity, not on gifts or favors. Associates must avoid giving or accepting anything that could create a conflict of interest or the appearance of one.

In general, associates may not give, solicit, accept, or receive gifts, meals, entertainment, or travel from anyone doing or seeking to do business with Catalyst, unless expressly permitted. These items should never influence your business judgment or appear to do so.

If you receive an unsolicited gift, notify your designated approver. They may decide how to handle it—such as donating it or using it for a team raffle. If you work in a store, give the gift to your General Manager. Always follow the [Travel and Expense Policy](#) and any department-specific rules about approvals and reporting. For additional guidance and examples, refer to the [Gifts, Meals, and Entertainment Policy](#) which provides more detail on what is and isn't appropriate in specific situations.

Because of close supplier relationships, international associates and U.S.-based associates working internationally must follow the guidelines established by the [International Gifts Policy](#).

## Interest in Competitors

Catalyst associates must always act in the Company's best interest and avoid situations where personal ties to a competitor could affect, or appear to affect, their work.

You may not work for or have any involvement with a Catalyst competitor that could interfere with your job. This includes management associates who want to work for a competitor while still employed by Catalyst.

Owning stock in a competitor is allowed only if the stock is publicly traded and your ownership is less than 0.1% of the company's total shares.

## Relations with Suppliers

Catalyst selects suppliers based on price, quality, and performance. Associates must avoid any personal or financial relationships with suppliers that could influence—or appear to influence—their business decisions.

You should not buy products or services for personal use from a supplier doing business with Catalyst, or one in negotiations, unless the supplier sells directly to the public and you pay the regular public price. Any special discounts not part of a Company program require written approval from the Ethics and Compliance Office.

Do not use your position at Catalyst to ask for or receive anything of value—such as special treatment, discounts, or favors—from suppliers for yourself or others. You should also avoid asking suppliers to take part in activities unrelated to business with Catalyst, such as charitable donations. If you have questions, contact [philanthropy-sm@catalystbrands.com](mailto:philanthropy-sm@catalystbrands.com).

## Former Associates

Catalyst appreciates the contributions of former associates, but business decisions must never be based on personal relationships with them.

Former associates may not represent a supplier doing business with Catalyst—or seeking to do so—until **one year** after leaving the Company.

## Taking a Corporate Opportunity

You should never take for yourself, nor divert to anyone else, a business or financial opportunity that Catalyst may have an interest in pursuing.

**Question:** I post paid product reviews as a social media influencer. Is this allowed?

**Answer:** Possibly. You may continue your social media activities as long as it doesn't involve Catalyst products or competitors, and you don't use confidential Company information or represent yourself as speaking on behalf of Catalyst. To be sure there's no conflict, discuss the details with your manager and make a full and prompt disclosure through My Kiosk.



## We Operate Ethically Where We Do Business

Catalyst is committed to doing business honestly and in full compliance with all applicable laws and regulations wherever we operate.

No officer, associate, or director has the authority to engage in conduct that violates the laws or regulations of the United States or any other country where we do business, or to direct or authorize others to do so.

Breaking the law can result in serious legal and financial consequences for both you and the Company and can damage Catalyst's reputation.

We also require our suppliers and business partners to follow all applicable laws and uphold Catalyst's ethical standards. For more information, see the [Catalyst Brands Supplier Principles](#).



## Financial Integrity

The integrity of Catalyst's financial records is essential. Accurate reporting ensures trust among associates, owners, regulators, and business partners. All financial transactions must be recorded fully, fairly, accurately, and on time.

Every associate—no matter their position—has a responsibility to record and maintain Catalyst's business and financial information honestly. This includes timesheets, payroll, sales, inventory, and all accounting records. Books and accounts must clearly and accurately reflect business activities. False, misleading, or incomplete entries are never allowed. No fund, asset, or account may be created or used unless it is properly recorded in Catalyst's books.

Company executives involved in financial reporting must understand and follow all disclosure and compliance requirements related to their roles.

Catalyst also provides confidential and anonymous ways to report any concerns about accounting, internal controls, or auditing practices. Reports can be made through the Catalyst Hotline at 1-800-527-0063 or online through the [Catalyst Hotline portal](#).



**Question:** We've been busy at our store, and our manager told us to finish tasks after clocking out. Do we have to do this?

**Answer:** No. Hourly associates must never work off the clock. Your time records must always show the actual hours you work. Report any such requests to your manager's manager, Human Resources, or the Catalyst Hotline.

**Question:** Our store received a call from someone claiming to be with Asset Protection and asking for credit card numbers from earlier transactions. What should I do?

**Answer:** Never share credit card numbers or any customer payment information over the phone. Immediately report the call to your manager. Sharing credit card information can put customers at risk for fraud. If someone claims they need information, ask for their name and phone number and let them know that management or the appropriate department will return the call.

**Question:** I saw a co-worker sign a customer up for a credit card after they said no. What should I do?

**Answer:** Report what you saw to your manager immediately. Misrepresenting information can lead to serious legal and reputational harm to Catalyst.

## Antitrust

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Catalyst believes in fair and open competition and follows all antitrust laws. These laws protect consumers by promoting competition in pricing, products, and services.

You must never make agreements with competitors or suppliers that limit competition. This includes:

- **Price fixing:** Agreeing on prices with competitors.
- **Market or supplier allocation:** Agreeing to divide customers, products, or regions.
- **No-poach or wage-fixing:** Agreeing not to hire each other's employees or to coordinate pay rates.

Avoid sharing sensitive information—like pricing, pay, or promotions—with competitors or during industry meetings. If you're unsure whether something is appropriate, contact the [Legal Department](#) before participating.

Violating antitrust laws can lead to serious legal and financial consequences for both you and Catalyst.

**Question:** I'm attending an industry meeting where competitors will discuss pricing. Can I join in?

**Answer:** Talk to the Legal Department first. You cannot share or discuss Catalyst pricing or make agreements that affect competition.

**Question:** Can we agree with another company not to hire each other's employees?

**Answer:** No. That's a no-poach agreement, which violates antitrust laws.



**Question:** Can I talk to friends at other retailers about wages to help keep pay rates steady?

**Answer:** No. Discussing pay or benefits with competitors could be wage fixing and is illegal.

## Bribery & Anti-Corruption Prohibitions

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Catalyst has zero tolerance for bribery or corruption anywhere we operate.

Never offer, promise, or give money, gifts, or anything of value to a government official, political party, or anyone else to influence a decision or gain an unfair advantage.

All associates must follow the [Foreign Corrupt Practices Act](#) (FCPA) and all other anti-bribery and anti-corruption laws. No deal or partnership is ever an exception.

Even small gestures, like meals or entertainment for foreign officials, may be considered a bribe and require prior approval from the Legal Department.

### Bribery of Public Officials

Catalyst strictly forbids using Company funds or assets to bribe or influence any government official, agency, or political group. The [Foreign Corrupt Practices Act](#) (FCPA) and other laws prohibit offering, giving, or promising anything of value—directly or indirectly—to gain business or an unfair advantage.

Bribes aren't just cash. They can include gifts, travel, entertainment, job offers, or anything of value. Modest hospitality may be acceptable in limited cases, but extravagant or cash gifts are never allowed. These rules also apply to payments made through consultants, suppliers, or other third parties on Catalyst's behalf.

**Question:** Who counts as a government official?

**Answer:** Anyone who works for a government, public agency, or government-owned business, including state-run companies or public utilities.

**Question:** A customs official asked for extra money to clear our shipment. Can I pay it?

**Answer:** No. Such payments are illegal and against Company policy. Contact the [Legal Department](#) before taking any action.

### Commercial Bribery

Catalyst does not allow any form of bribery or improper payments.

You must never offer, give, or promise anything of value to influence someone's business decisions. Likewise, you may not accept or request

bribes, kickbacks, or favors from anyone doing business with or competing with Catalyst.

All business decisions must be made honestly and fairly.



## Political Activities

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Catalyst respects your right to participate in politics, but these activities must be restricted to your personal time, resources, and facilities. Do not use Company time, funds, property, or resources for political purposes.

You may choose to support or avoid political causes—your choice will not affect your employment.

If you plan to run for or accept a public office, you must notify your manager and submit a [disclosure](#) through My Kiosk for approval before moving forward, to avoid any conflicts of interest.

Catalyst must comply with laws that regulate corporate political donations and lobbying. Any contributions, services, or contact with government officials on behalf of Catalyst must be approved in writing by Government Relations. For questions, contact Government Relations at [grgroup-sm@catalystbrands.com](mailto:grgroup-sm@catalystbrands.com).

**Question:** Can I have Catalyst join a trade association?

**Answer:** Not without approval. Contact Government Relations before joining or serving on any board or committee using Company funds.

**Question:** Can I ask a question about Catalyst at a town hall?

**Answer:** Only with prior approval from Government Relations.

**Question:** Can I host a panel that includes elected officials?

**Answer:** Yes, but coordinate with Government Relations and Communications first to ensure compliance and protect confidential information.



## Media Relations

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To protect Catalyst's reputation and ensure accurate communication, only authorized representatives may speak to the media on behalf of the Company.

You may not respond to inquiries from reporters, news outlets, trade publications, or online media without prior approval from Media Relations. Speaking directly to the media without approval could lead to the release of incorrect or confidential information.

All media inquiries should be directed to Media Relations at [news-sm@catalystbrands.com](mailto:news-sm@catalystbrands.com).



## Social Media

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Social media is a great way to share your life and opinions, but it also comes with responsibilities. Use good judgment when posting and consider how your online activity could affect you, your co-workers, or Catalyst.

Do not pressure or harass anyone to “friend” or connect with you, and do not engage with customers on social media or respond to their questions or comments on behalf of Catalyst. Only authorized associates may communicate on the Company’s behalf.

For more information, see the [Catalyst Social Media Policy](#).

**Question:** I have a makeup blog that I started before joining Catalyst. Can I keep it?

**Answer:** Possibly. Depending on your role, it could create a conflict of interest. Notify your manager and make a full and prompt disclosure through My Kiosk before continuing. For further guidance on how to make a disclosure, [click here](#).



## Communications

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At Catalyst, we are committed to being fair, honest, and accurate in all our communications—with associates, customers, suppliers, and the public.

All information we share must be truthful and complete, especially regarding product details, pricing, availability, credit terms, warranties, and online orders.

Never manipulate or misrepresent information. Our customers, partners, and communities must be able to trust Catalyst to communicate honestly and responsibly at all times.



## Protection of Company Property

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Catalyst invests significant resources in developing and maintaining its assets, and all associates are responsible for protecting them. Anything created for or provided by Catalyst is owned by the Company and must be used only for legitimate business purposes—never for personal gain.

Company property includes cash, inventory, equipment, supplies, displays, samples, and data, as well as intangible assets such as trademarks, copyrights, patents, trade secrets, business strategies, and confidential information.

Theft, fraud, embezzlement, or misuse of Catalyst property is strictly prohibited and may result in disciplinary action or termination. Company assets or funds must never be used unlawfully or in ways that could harm Catalyst’s reputation or finances.

If you suspect possible fraud, contact the [Catalyst Hotline](#), [Legal](#), or [Asset Protection](#) immediately. Do not confront anyone or investigate on your own.

Examples of Fraud:

- Theft of cash, inventory, or property
- Expense report or payroll fraud
- Kickbacks, bribery, or conflicts of interest
- Falsifying company records or reports

**Question:** A co-worker asked me to share department software that can also be downloaded for free online. Should I do it?

**Answer:** No. Never copy or share Company software without approval. Doing so may violate license agreements or copyright laws. All software must be requested through the approved Software and Hardware Request (SHR) process which may allow you to download software via self-service software available on OneCatalyst.

## Artificial Intelligence (AI)

Artificial Intelligence (AI) can be a powerful tool for creating and supporting work, but it must be used carefully and responsibly. AI raises concerns around confidentiality, privacy, transparency, and misinformation.

All associates must follow the [Generative Artificial Intelligence \(AI\) Acceptable Use Policy](#) when using AI to create or assist in Company work. Never share confidential or sensitive information with AI tools unless authorized.

If you have questions about using AI, contact your manager or IT Security for guidance.

**Question:** What is Artificial Intelligence (AI)?

**Answer:** AI is technology that allows computers and machines to simulate human learning, problem solving, and decision making to perform tasks intelligently and autonomously.

## Our Intellectual Property

Catalyst protects its intellectual property (IP)—including trademarks, copyrights, trade secrets, and innovations. These creations, developed by associates or others working for Catalyst, are valuable assets that drive our success and belong to the Company.

Any invention, design, pattern, or idea created while working for Catalyst is owned by the Company if it:

- Comes from your work for Catalyst
- Uses Company time, equipment or resources
- Relies on Catalyst's confidential information or trade secrets

Associates must assign all rights in such creations to Catalyst and help protect those rights as needed.

**Question:** Can I include designs I created at Catalyst in my professional portfolio?

**Answer:** Maybe. You must get manager approval first, and only for older designs—not active or in-progress work.

**Question:** I developed a new product for Catalyst and want to sell a similar version to local businesses. Can I?

**Answer:** No. Any work or idea developed for Catalyst belongs to the Company. You may not use or sell it outside Catalyst or compete with the Company.

## Safeguarding Confidential Information

Catalyst treats all non-public business information as confidential. You may not share or use Catalyst's confidential information for personal benefit or the benefit of others without proper authorization.

Confidential information includes trade secrets, business plans, pricing, marketing strategies, supplier and customer details, financial data, and any other non-public information that could give others a competitive or economic advantage. Even within Catalyst, share such information only on a need-to-know basis.

Be alert to phishing (email), smishing (text), and vishing (phone) attempts to steal information. To report suspicious emails, highlight the message and press the Phishing Alert button in Outlook.

Your duty to protect Catalyst's information continues after your employment ends. Unauthorized access, sharing, or use of Company information may lead to disciplinary action or legal penalties.

You must also protect confidential information belonging to others, including former employers, suppliers, and business partners

**Question:** Can I post about Catalyst's sales results on an online retail forum if I stay anonymous?

**Answer:** No. Sharing non-public Company information—anonymous or not—violates this policy.

**Question:** Our store received a call from a customer asking me to scratch off the back of several gift cards and read the numbers aloud or enter them into a website or app. What should I do?

**Answer:** Ask for their name and phone number and then immediately report the call to your manager and Asset Protection. If the customer hangs up before providing contact information, still report this incident to your manager and Asset Protection. Gift card scams can cause financial loss to customers and the Company. Promptly reporting suspected scams, even if no money was lost, helps protect our customers, your store and the Company.

**Question:** I brought documents from my previous job that could help me at Catalyst. Can I use them?

**Answer:** No. Using or sharing confidential materials from a prior employer is prohibited and may be illegal.



**Question:** I'm helping select a supplier and want to buy stock in one of the bidders. Is that okay?

**Answer:** No. That would create a conflict of interest and could violate securities laws if the supplier is publicly traded, and you have non-public information.

## Protection of Customer and Supplier Information

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Catalyst values the trust and privacy of our customers and suppliers. All associates must protect their personal information (PI) and use it only for authorized business purposes.

PI includes any data that can identify someone—such as name, address, phone number, email, date of birth, government ID, payment or account details, biometric data, or device information.

You are responsible for following the [Data Privacy Policy](#) and taking steps to prevent unauthorized access, use, or disclosure of customer and supplier information. Share this information only when it is necessary for business purposes and only with authorized individuals or partners who have approved agreements in place.

When disposing of customer or supplier information, ensure it is done securely and properly.

If you have questions, contact the [Catalyst Privacy Office](#).

**Question:** I have access to customer or supplier data. What should I do to keep it safe?

**Answer:** Follow the [Data Privacy Policy](#), [Information Security Policy](#), and all related procedures to ensure proper use and protection of sensitive information.

**Question:** I accidentally sent personal information to someone outside Catalyst. What should I do?

**Answer:** Immediately contact Information Technology Security and Compliance (ITSC) at [ITSC-GR-dl@catalystbrands.com](mailto:ITSC-GR-dl@catalystbrands.com), the Privacy Office at [privacyrights@catalystbrands.com](mailto:privacyrights@catalystbrands.com), and your manager immediately.



## Associate Privacy and Personal Activities

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Catalyst is committed to protecting the personal information (PI) of all associates. Under the [Data Privacy Policy](#), we must prevent the unauthorized access, use, disclosure, or improper disposal of associate information.

Never share or use another associate's PI without their consent or unless permitted under Company policies. Handle all personal data carefully and report any suspected privacy or security issue immediately.



**Question:** I received another associate's personal information by mistake. What should I do?

**Answer:** Contact ITSC at [ITSC-GR-dl@catalystbrands.com](mailto:ITSC-GR-dl@catalystbrands.com) the Privacy Office at [privacyrights@catalystbrands.com](mailto:privacyrights@catalystbrands.com), and your manager to determine what information was sent.

**Question:** I think my password has been compromised. What should I do?

**Answer:** Change your password immediately, then contact ITSC and your manager for assistance. They will work with you to ensure your data is secure and that you have not been compromised.

**Question:** My Company-issued laptop or phone was lost or stolen. What now?

**Answer:** Report it immediately to ITSC and your manager. See [Information Security Policy](#).

## Product Safety and Integrity

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Catalyst never compromises on product safety or quality. All products must be produced, tested, packaged, and labeled according to Company standards and all applicable laws.

If you become aware of a potential safety issue, report it immediately to Product Safety at [productsafety-sm@catalystbrands.com](mailto:productsafety-sm@catalystbrands.com) and notify the appropriate buyer. Product Safety, in coordination with Legal, will investigate and take any necessary action.

**Question:** Customers report that a zipper pull on a child's sweater came off and could pose a choking hazard. What should I do?

**Answer:** Report it right away to Product Safety and the buyer so an investigation can begin immediately.

**Question:** I think a product might contain materials restricted under California law, but the supplier says it's fine. What now?

**Answer:** Contact the [Legal Department](#) to confirm compliance with laws like California Proposition 65 before the product is sold.

## Health and Safety

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Catalyst is committed to providing a clean, safe, and healthy workplace for all associates. We follow all environmental, health, and safety laws to protect our customers, associates, and communities.

Every associate is responsible for maintaining a safe work environment by following all Catalyst safety rules, procedures, and regulations. We also work to minimize our environmental impact and prevent risks to human health and safety.

For more information, contact [Environmental Health and Safety](#) or Supply Chain Safety.



## In Closing

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The Code of Conduct is an important part of your relationship with Catalyst. It outlines your responsibilities and our shared commitment to ethical behavior but is not a contract of employment.

Employment with Catalyst is at-will, where permitted by law—meaning either you or Catalyst may end the employment relationship at any time, for any lawful reason, or for no reason at all. Nothing in this Code changes that relationship.

Catalyst is committed to following all federal, state, and local laws, including the National Labor Relations Act (NLRA). The Code will never be interpreted or applied in a way that restricts your rights under the NLRA or any other law. This includes your right to discuss or take part in concerted activities related to wages, hours, or other terms and conditions of employment.

Violations of the Code may result in disciplinary action, up to and including termination. Catalyst takes its ethical principles seriously, and every associate is expected to do the same.

If you have questions about the Code or its application, contact Human Resources or the Ethics and Compliance Office.

## Amendments and Exceptions

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From time to time, Catalyst may amend or modify this Code of Conduct to reflect changes in the law, address business needs, or strengthen our commitment to ethical standards.

Limited exceptions to the Code for Director-level associates and Officers may be approved only by the Catalyst Compliance Committee and must comply with all applicable laws.

All other associates seeking an exception must submit a written request in advance to [ethics-sm@catalystbrands.com](mailto:ethics-sm@catalystbrands.com). Each request must include the relevant details and reasons for the exception, and approval must be received before proceeding with the related activity.

## Resources

Use the Code of Conduct as your first source for information about ethics and standards of conduct. For the most current version, refer to the electronic documents online. If you don't find the answer you need, contact the appropriate resource listed below:

If you are calling from outside the United States, please dial +1 or 001 before the number

Resource	Link	Contact Info
Catalyst Brands Benefits Center		1-888-890-8900
Catalyst Hotline	<a href="#">Catalyst Brands Hotline</a>	1-800-527-0063
Corporate Communications		External inquiries: <a href="mailto:news-sm@catalystbrands.com">news-sm@catalystbrands.com</a>
Data Privacy Policy	<a href="#">Data Privacy Policy</a>	<a href="mailto:privacyrights@catalystbrands.com">privacyrights@catalystbrands.com</a>
Employment of Relatives Policy	<a href="#">Employment of Relatives &amp; Fraternization Policy</a>	
Environmental, Health & Safety	<a href="#">Environmental, Health &amp; Safety</a>	
Equal Employment Opportunity (EEO)	<a href="#">EEO Policy</a>	
Ethics & Compliance	<a href="#">Ethics</a>	<a href="mailto:ethics-sm@catalystbrands.com">ethics-sm@catalystbrands.com</a>
Facilities (non-emergency, low store impact)	Work orders open in <a href="#">FM WORKS</a>	
Foreign Corrupt Practices Act (FCPA)	<a href="#">FCPA</a>	
Government Relations – Reporting Members Policy	<a href="#">Reporting Memberships Policy</a>	
Government Relations – Policy on Interactions with Elected Officials	<a href="#">Policy on Interaction with Elected Officials</a>	
Government Relations – Policy on Legislative Activity of Trade Association	<a href="#">Policy on Legislative Activity of Trade Associations</a>	
HR Policies and Procedures	<a href="#">HR Policies and Procedures</a>	
Information Security Policy	<a href="#">Information Security Policy</a>	
Information Systems Development and Support Requirements	<a href="#">Information Systems Development and Support Requirements</a>	
Information Technology Security and Compliance (ITSC)		<a href="mailto:ITSC-GR-dl@catalystbrands.com">ITSC-GR-dl@catalystbrands.com</a>
Information Technology Service Desk (ITSD)		1-800-214-4822
Internal Communications		<a href="mailto:communications-sm@catalystbrands.com">communications-sm@catalystbrands.com</a>
International Gifts Policy	<a href="#">International Gifts Policy</a>	
Legal Department	<a href="#">Legal Department</a>	
Philanthropy		<a href="mailto:Philanthropy-sm@catalystbrands.com">Philanthropy-sm@catalystbrands.com</a>
Product Safety		<a href="mailto:Productsafety-sm@catalystbrands.com">Productsafety-sm@catalystbrands.com</a>
Social Media Policy	<a href="#">Social Media Policy</a>	
Catalyst Brand Stores	<a href="#">Catalyst Brand Stores</a>	
Supplier Principles	<a href="#">Supplier Principles</a>	
Travel and Expense Policy	<a href="#">Travel and Expense Policy</a>	