



WORLDWIDE CODE OF ETHICS

As adopted by the Crocs, Inc. Board of Directors on December 12, 2017, and updated on June 11, 2019, November 12, 2020, and June 14, 2022.

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A Message from Andrew:

In 2002, Crocs introduced one of the most unique shoes the world had ever seen. For the past 18 years, we've been helping millions of people be comfortable in their own shoes. From one innovative shoe, a delightfully democratic brand was born.

We added to our Crocs portfolio in February 2022 with the acquisition of HEYDUDE Inc., a casual footwear brand designed for men, women, and children which makes us a world leader in innovative casual footwear. As a subsidiary of Crocs, Inc. our Worldwide Code of Ethics (the “**Code**”) applies equally to Hey Dude employees.

Acting ethically and with honesty is essential to maintaining our reputation with our customers as a preferred shopping destination, with our employees as a great place to work, and with our communities and stakeholders as a responsible corporate citizen.

We expect our employees, regardless of level or role, to adhere to the highest standards of ethical business conduct when dealing with co-workers, customers, vendors, and other third parties. The Code defines the standards we expect each employee to follow and is intended to provide the information, resources, and tools necessary to conduct ourselves in accordance with those standards.

No matter our role or where we work in our global company, we can look to the Code for guidance in making decisions and taking actions that are fair and honest. It applies to me, our Board of Directors, and all of our employees across the globe. That is why each of us is expected to read and acknowledge our Code and become familiar with its contents.

We realize that no set of policies or guidelines can cover every possible challenge we may encounter. I encourage you to keep these questions in mind when confronted with business decisions that have ethical repercussions:

- Is it legal? And does it comply with the values set forth in the Code?
- What if my actions were reported on the front page of the newspaper?
- What would my family, friends, or neighbors say about my actions?
- Will there be any negative consequences for the Company?

We also place a premium on open, honest communications about ethics and integrity concerns in a “**speak up culture**” where you can feel free to raise concerns without having to worry about negative consequences. There are many channels available to help you, including your manager, local Human Resources department, and our **EthicsLine** (visit www.speakupcrocs.com to find a list of phone numbers by country or to make a report online). We will not tolerate retaliation against anyone who makes a good-faith report of a suspected violation of the Code.

Sincerely,

Andrew Rees

Chief Executive Officer

Purpose:

The Code contains general guidelines for conducting the business of Crocs, Inc., and its subsidiaries, affiliates, and related companies worldwide, including HEYDUDE, (“**the Company**”). It was established pursuant to Section 406 of the Sarbanes-Oxley Act of 2002 that defines a code of ethics as written standards designed to deter wrongdoing and promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely, and understandable disclosure in reports and documents the Company files with, or submits to, the Securities and Exchange Commission and in other public communications made by the Company;
- Compliance with applicable laws, rules and regulations;
- The prompt internal reporting of violations or suspected violations of the Code to an appropriate person(s) identified in the Code; and
- Accountability for adherence to the Code.



Scope:

The Code applies to all Company directors, officers, employees and representatives, including but not limited to consultants, agents and advisors, wherever they are located and whether they work for the Company on a full or part-time basis. The Code refers to all persons covered by the Code as **“Company employees”** or **“employees.”** The Code refers to certain Company executives, including the Chief Executive Officer, President, the Executive Vice President, Chief Financial Officer, the Executive Vice President, Chief Legal & Risk Officer and the Executive Vice President, Chief Operations & Transformation Officer, and the Executive Vice President, Chief People Officer as **“Executive Officers,”** and refers to certain other senior executives as the **“Leadership Team.”**



Policies

1. General Principles

The Company is committed to conducting business lawfully and ethically. Employees are expected to exercise the highest standards of honesty and ethical behavior in decisions that may affect our business, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.

The Code is the center-piece of our Ethics & Compliance Program, and is the framework for the high standards we envision. It does not include all company policies or the rules and regulations that apply to every situation and should be viewed as part of the policies, procedures, and requirements of the law that guide you in your daily work. The Code is not a contract of employment and does not create any express or implied contractual rights of employment between you and the Company or create a third party contract.

Every employee is expected to adhere to the standards set forth in the Code, including reporting potential violations. A violation of the Code impacts our competitive position, and may expose the Company and you to civil and criminal penalties. Moreover, a violation of the Code will result in disciplinary action, up to and including termination of employment. Ignorance is not an acceptable excuse for improper behavior.

Just as we all have a duty to know and follow the Code, we are also responsible for knowing and following the laws and regulations that apply to our work in every location where the Company operates. If there is a discrepancy between between local law and our Code or policies, seek guidance from the Legal department.

Refer to the guidelines described in the Code ([Section 15](#) and [Schedule A – Resources](#)) for the multiple options available for reporting a suspected violation of the Code or applicable laws or regulations. You should be confident that when you report a suspected violation of the Code, your concerns will be fully investigated in a timely manner. And the following cannot be stressed enough: ***The Company will not tolerate retaliation against anyone who makes a good-faith report of a suspected violation of the Code.***



2. Compliance With Laws

It is the Company's policy that employees comply with all applicable laws, rules and regulations wherever we are located or do business, including applicable trade, tax, labor, employment, and consumer protection laws and regulations. This is the most fundamental policy underlying the Company's commitment to ethical business behavior.

The laws of the United States frequently extend to our operations throughout the world. Other countries may also apply their own laws outside of their borders. In some instances, there may be a conflict between the applicable laws of two or more jurisdictions. In keeping with our commitment to meet the highest standards of business conduct wherever we do business, employees must comply with all aspects of the Code unless prohibited by local law. If you believe there is a conflict, or if in some countries certain laws are not enforced in practice, compliance is nonetheless required. Conversely, there may be laws in certain countries which do not apply outside those countries, and therefore, are not specifically addressed in the Code. Such laws would be addressed in Company documents such as Employee Handbooks, Policy Manuals, Work Rules, Operations Manuals, etc. The Company also publishes several "global policies" designed to give employees a set of rules that are the same for all locations. The Code is an example of a global policy.

3. Equal Opportunity Employment

The Company is an equal opportunity employer. The Company extends equal opportunities to all applicants and employees without regard to race, religion, color, creed, national origin, ancestry, ethnicity, age, gender, pregnancy, childbirth, breastfeeding and medical condition related to pregnancy, childbirth or breastfeeding, familial status, sexual orientation, gender identity or expression, disability, marital status, citizenship, military and veteran's status, and any other basis protected by applicable law. This policy applies to all aspects of employment, including recruiting, hiring, training, transfers, promotions, and compensation and affirms the Company's commitment to the principles of fair employment and the elimination of all vestiges of discriminatory practices that might exist.



4. Diverse and Inclusive Workplace/Anti-Discrimination and Anti-Harassment

The Company celebrates people of all kinds and is committed to providing a comfortable and inclusive workplace by providing opportunities for all employees based on their individual needs. The Company lives the spirit of “Come As You Are” (CAYA) across all areas of its business, embracing and supporting individuality and inclusivity.

The Company will not, under any circumstances condone or tolerate conduct that may constitute unlawful discrimination or harassment (sexual or otherwise), whether caused by an employee, customer, or vendor. The Company seeks to maintain a safe, healthy, and secure work environment. It is our goal to create a workplace free from, harassment, intimidation, violence, threats of violence and other disruptive behavior. Unacceptable harassment includes unwelcome behavior or actions (e.g., epithets, jokes, comments, gestures, circulating graphic material, or other verbal or physical conduct) directed to a person or group based on their protected class status that unreasonably interferes with work performance or creates a hostile work environment. Employees must not engage in this type of behavior and must actively contribute to a respectful work environment.

One form of harassment is sexual harassment. Sexual harassment includes, but is not limited to, making unwelcome sexual advances, requests for sexual favors and other visual, verbal or physical conduct of a sexual nature when: (1) submission to such conduct is made either explicitly or implicitly a term or condition of employment; (2) submission or rejection of the conduct is used as a basis for making employment decisions; or (3) the conduct has the purpose or effect of interfering with work performance or creating an intimidating, hostile or offensive work environment. This definition includes many forms of offensive behavior and includes, but is not limited to, harassment by employees or non-employees, gender-based harassment of a person of the same sex as the harasser, and comments or actions made outside of the workplace that could impact the work environment.

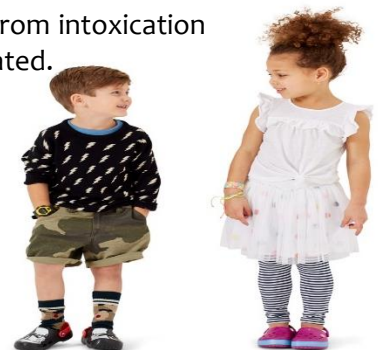
If you experience, witness, or learn of discrimination or harassment in the workplace, report it to your supervisor, local Human Resources department, or the Ethics Line (visit www.speakupcrocs.com to find a list of phone numbers by country or to make a report online). The Company will investigate all accusations of discrimination, harassment, intimidation, workplace violence or other such disruptive behavior and take appropriate action, up to and including termination, of any employee found in violation of this policy.

Refer to the separate A Matter of Respect: Company’s Separate Policy Against Harassment or contact the Human Resources department for more information and guidance.

5. Workplace Health and Safety.

The Company is committed to providing a healthy and safe work environment. Violence and threatening behavior are not permitted. Employees should follow all safety and health rules and report accidents, injuries, and unsafe equipment, practices, or conditions. A supervisor should be notified of any safety or health concerns so that they can be addressed.

Employees should report to work in condition to perform their job duties, free from intoxication due to drugs or alcohol. The use of illegal drugs in the workplace will not be tolerated.



6. Conflicts of Interest and Disclosure of Related Party Transactions

Each employee is required to be free of any private interests that might conflict with the interests of the Company or make it difficult to perform work objectively and effectively. Although this obligation does not prevent employees from engaging in personal transactions that are not Company-related, it does require the avoidance of situations where a conflict of interest might occur or appear to be present.

Personal conflicts of interest are prohibited as a matter of Company policy, unless they have been *waived* in writing by the Executive Vice President, Chief Legal & Risk Officer. In particular, no employee may use or attempt to use his or her position at the Company to obtain any improper personal benefit for himself or herself, for family members (defined as a person's spouse; parents; children and siblings whether by blood, marriage or adoption; or anyone residing in such person's home), or for any other person, from any person or entity. Service to the Company should also never be subordinated to personal gain or advantage.

Employees must also consider whether their activities and associations with other individuals or companies may result in a conflict of interest. If the activity or association could negatively affect the employee's ability to make business decisions in the best interest of the Company, or if the activity or association could result in disclosing non-public Company information, the employee may have a conflict of interest.

The following are examples of various situations where potential conflicts of interest may exist:

- Having a significant financial interest (ownership or otherwise) in a competitor or in a company that does business with the Company.
- Serving as a director, manager, consultant, committee member, employee or independent contractor for a competitor or a company that does business with the Company, except with an Executive Officer's specific prior knowledge and consent.
- Obtaining any material personal benefits or favors because of your position with the Company.
- Disclosing or using for the employee's benefit confidential or non-public information regarding the Company or other organizations with which the Company does business.
- Directly or indirectly competing with the Company in buying or selling property, property rights, or other interests.
- Obtaining loans or guarantees of personal obligations from, or entering into any other personal financial transactions with, a competitor or any company that does business with the Company. This does not include arms-length transactions with recognized banks or other financial institutions.

Representing the Company in any transaction, arrangement or relationship (including any indebtedness or guarantee of indebtedness) or any similar transaction, arrangement or relationship in which a "Related Person" has a direct or indirect interest creates a potential conflict of interest.

“Related Persons” include:

- Board of Directors and Executive Officers of the Company
- Nominees for Board of Director;
- Immediate family members of a Board of Director or nominee, the Leadership Team, and other officers of the Company; and
- Holders of more than five percent (5%) of the Company’s stock, or an immediate family member of such holder.

An “indirect” interest of a Related Person in a transaction includes a Related Person serving as an officer or employee of, or being a significant investor or equity holder in, an entity that is a party to a transaction with the Company.

Conflicts of the Company’s Board of Directors or Executive Officers may only be waived by the Audit Committee, and will be disclosed to the public, if required. Conflicts of the Leadership Team may only be waived by the Executive Vice President, Chief Legal & Risk Officer.

The Audit Committee must approve any transaction with a Related Person before commencement of the Related Person transaction; *provided, however*, that if a Related Person transaction is identified after it commences, it shall be brought to the Committee for ratification.

The Related Person transaction should be presented to the Audit Committee by an Executive Officer requesting that the Audit Committee consider the Related Party transaction at its next scheduled meeting. The Executive Officer presenting the transaction must advise the Audit Committee of all terms of the transaction, including without limitation, the information that would need to be disclosed about the transaction in the Company’s SEC filings.



The following Related Party transactions do **not** require Audit Committee approval:

- Payment of compensation by the Company to a Related Person for the Related Person's service to the Company in the capacity or capacities that give rise the person's status as a "Related Person;" and
- Transactions available to all employees or all shareholders of the Company on the same terms; and
- Transaction which, when aggregated with all other transaction between the Related Person and the Company, involve less than USD \$100,000.00 in a fiscal year.

Should you have any questions regarding whether or not a personal interest presents a conflict with the Company, consult the appropriate contact person set forth in [Schedule A – Resources](#).



7. Gifts and Hospitality

Accepting or receiving gifts of any value, favors, compensation, loans, excessive entertainment, or similar activities from a competitor or a company that does business or wants to do business with the Company is also a situation where a potential conflict of interest may exist. The purpose of business entertainment and gifts in a commercial setting is to create good will and sound working relationships, not to gain an unfair advantage with customers. Employees who are offered a gift or favor in excess of **USD \$100.00** in value must fully disclose it to a member of the Leadership Team and obtain a *waiver* in writing from the Executive Vice President, Chief Legal & Risk Officer prior to acceptance.

No gift or entertainment should ever be offered, given, provided, or accepted by any employee of the Company if: (i) in form of cash or cash equivalents (e.g., gift cards); (ii) it could be construed as a bribe; (iii) is excessive in value; or (iv) it violates any law or regulation.

If a non-cash gift is received with a value in excess of **USD \$100.00**, if practical, return it to the sender or write a personal check to the sender for its full value. Occasionally, there may be times when returning a gift would be impractical (e.g., perishable or consumable goods). In those rare instances, accept the gift on behalf of the Company, find a fair way to distribute it equally among the members of your department or donate it to a charitable organization.

8. Corporate Opportunities

Employees have an obligation to put the interests of the Company ahead of their personal interests and to advance the Company's interests when the opportunity to do so arises. If an employee discovers or is presented with a business opportunity that is in the Company's line of business, first present the business opportunity to the Company before pursuing the opportunity in an individual capacity and then only pursue such opportunity after obtaining a *waiver* in writing from the Executive Vice President, Chief Legal & Risk Officer, or in the case of an Executive Officer, from the Audit Committee.

Likewise, no employee may use corporate property, information, or their position within the Company for personal gain.



9. Confidential Information

Employees have access to a variety of Confidential Information while employed at the Company. “**Confidential Information**” includes all non-public information that might be of use: (i) to investors in making a decision to buy, hold, or sell the Company’s securities; (ii) to competitors; or (iii) if disclosed could be harmful to the Company or its customers. This includes includes, but is not limited to strategic plans; sales figures; financial information; marketing plans and strategies; brand development; quality assurance manuals; product lines or designs; patents; proprietary software; information regarding negotiations, agreements or dealings between the Company and others; internal reports, policies or other business-related confidential communications; and certain employee-related information (e.g., personal health information, performance history, budgeted payroll or expenses). Whether or not subject to a confidentiality agreement, employees have a duty to safeguard all Confidential Information of the Company or of third parties with which the Company conducts business, except when disclosure is authorized or legally mandated. Unauthorized disclosure of Confidential Information could cause competitive harm to the Company or its customers and could result in legal liability to the employee and the Company.

An employee’s obligation to protect confidential information continues after he or she leaves the Company. Upon separation from employment, all documents, papers, computer disks, thumb drives, Company-provided laptops or mobile devices, or other material (including copies thereof) in an employee’s possession or control must be returned.

10. Accuracy of Books, Records, and Communications With the Public

All Company books, records, and communications must be accurate, complete, and in compliance with U.S. GAAP (Generally Accepted Accounting Principles) and any other applicable laws or regulations. False, incomplete, or misleading entries or records in Company books, financial records, or expense reports are prohibited. Undisclosed or unrecorded funds, payments, or receipts that are inconsistent with the Company’s business practices are also prohibited.



Employees must also be full, fair, accurate, timely and understandable in all business communications. Never misrepresent the facts or hide the truth. It is Company policy to promptly and fully investigate any incident of fraud or theft relating to the Company. If necessary, the Company will prosecute such behavior to the fullest degree.

As a public Company, Crocs and HEYDUDE are subject to various securities laws, regulations, and reporting obligations. The Company is committed to full, fair, accurate, timely, and understandable disclosure in all public communications and in the information it provides to its stockholders. To maintain this commitment, the Company will comply with all applicable securities laws and regulations, accounting standards and controls, and audit practices. Inaccurate, incomplete, or untimely reporting will not be tolerated and can severely damage the Company and cause legal liability.

The Company strives to communicate with the public (i.e., media, reporters, distributors, independent representatives) in an accurate and consistent manner. This is normally accomplished through a press release. Employees are not authorized to speak on behalf of the Company regarding material events because doing so risks providing incorrect information or revealing proprietary strategy. Rather, to ensure compliance with the law and protect our business interests, do not speak to the public or the media on behalf of the Company. Employees are expected to direct any inquiries to our internal Public Relations team, who will work directly with the inquirer to determine the best the Company spokesperson.

11. Imports, Exports, and Customs

As the Company purchases, distributes and sells its products in countries around the world, it is important that the Company and our employees comply with all applicable laws, regulations and standards of the United States or any state or local government. This includes:

- Laws that regulate the export of products from the U.S. and the re-export of products from foreign countries in addition to regulations from other jurisdictions in which our product is moved.
- All shipping, labeling, customs, and commercial documents required for entry into countries where our product is distributed must be true and accurate. This policy applies to any vendors working with the Company as well.
- Compliance with the U.S. Anti-boycott regulations for companies that prohibit cooperation with foreign-led economic boycotts in which the United States does not participate.
- Compliance with any regulations on trade sanctions, embargoes on certain countries or groups, or specifically designated nationals as a matter of foreign policy.

12. Bribery & Anti-Corruption

Offering or accepting bribes, kickbacks, or payoffs from a past, current or potential business partner to obtain, influence, or maintain a transaction or relationship is prohibited.

When conducting business outside the United States, you must also be sensitive to foreign legal requirements and U.S. laws that apply to foreign operations, including the Foreign Corrupt Practices Act (“FCPA”) and the UK Bribery Act. The FCPA, the UK Bribery Act, and similar laws address how companies conduct business outside the U.S. and make it unlawful to make a payment and/or offered anything of value to foreign government officials, government agencies, political parties, political candidates, or in some cases, anyone, to influence the action taken by such individual or agents or to gain a competitive or improper business advantage. It is very important to know that the prohibitions of the FCPA, the UK Bribery Act, and similar laws apply to actions taken by all employees and by all outside parties engaged directly or indirectly by the Company (e.g., consultants, brokers, professional advisors, or sales representatives). The fact that such activities may be accepted local practice in a country does not relieve you from complying with such laws. The FCPA, the UK Bribery Act, and similar laws also require companies to maintain accurate records showing that payments and expenses were for valid business purposes.

Employees should also refer to the guidelines described in the Code or in the Company’s separate [Anti-Bribery & Corruption Policy](#) if they find themselves in a situation which may lead to a violation of the Code or applicable laws or regulations. Given the complexity of the FCPA, the UK Bribery Act, and similar laws, and the severe penalties associated with an investigation or violation, employees are urged to contact the Legal department with any questions concerning the Company or their obligations under and in compliance with these laws.

Report any actual or attempted bribery, kickback or fraud to the Executive Vice President, Chief Legal & Risk Officer or the Ethics Line (visit www.speakupcrocs.com to find a list of phone numbers by country or to make a report online).



13. Competition and Fair Dealing

It is Company policy to outperform our competition fairly and honestly. The Company does not seek competitive advantages through illegal or unethical business practices. Each employee should endeavor to deal fairly with our customers, service providers, suppliers, competitors, and employees. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice.

14. Protection and Use of Company Assets

All employees should protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on Company profitability.

Company assets should also not be used for non-Company business, though incidental personal use may be permitted. Any act that involves theft, fraud, embezzlement, or misappropriation of any of the Company's property is prohibited and will result in disciplinary action, up to and including termination.

Any suspected incident of fraud or theft should be immediately reported to your local Human Resources or Legal departments or the Ethics Line (visit www.speakupcrocs.com to find a list of phone numbers by country or to make a report online).



The obligation of directors, employees, and representatives to protect Company assets includes proprietary information, intellectual property, and innovative ideas. These intangible assets are very valuable to the Company and must be appropriately managed and protected. Intellectual property rights, including patents, trademarks, copyrights, trade secrets, and knowhow are valuable assets and must be planned for and managed with the same degree of care as any other asset. New concepts and ideas will be identified for purposes of evaluation and protection, as appropriate, to support the Company's long-term and short-term goals. Where appropriate, ideas should be directed to the Legal department for patent, copyright, or trade secret protection. The Company owns any inventions, discoveries, ideas, concepts, works of authorship, and trade secrets that an employee develops during the employment relationship. Employees are expected to assist documenting the Company's ownership interest in this type of intellectual property where appropriate.

The Company's trademarks and service marks, including trade names, logos, or other words or symbols identifying or associated with the products manufactured or distributed by the Company, must always be used exactly as they are registered or, in the case of non-registered marks, as they are established by the Company. All Company marks must appear with the appropriate trademark or other notice (such as ® or ™) or other notice of proprietary rights in the the Company's marks as instructed by the Company.

If other organizations use any of the Company's intellectual property without authorization, they will be vigorously prosecuted. In turn, employees must not violate the intellectual property rights of other organizations.



Employees and representatives have an obligation to protect and manage any software that is licensed by the Company. Software includes programs, routines, and procedures that cause a computer system to perform a predetermined function or functions, as well as the supporting documentation. All software use must be in compliance with applicable laws and contractual obligations assumed by the Company, including copyright laws and necessary licensing. No employee or representative may use unlicensed software or create or use unauthorized copies of software.

Refer to the separate [Information Security Policy](#) or contact the IT department for more information and guidance.

15. Securities Laws/Insider Trading

In the course of employment, you may become aware of material non-public information of The Company. **“Material non-public information”** is any information not publically known concerning a company’s business, prospects, securities, or market that an investor might consider important in deciding whether to buy or sell the securities of the company or that could affect the market price of the securities.

Examples of material non-public information include: (i) possible mergers, acquisitions, or divestitures; (ii) actual or estimated financial results or changes in dividends; (iii) purchases and sales of investments in companies; (iv) obtaining or losing significant contracts; (v) significant product developments; (vi) threatened major litigation or developments in such matters; and (vii) major changes in business strategies.

It is illegal and against Company policy for an employee, or any member of an employee’s immediate family, to buy or sell the Company’s stock (or securities of another company to which the information applies) when they have material, non-public information. You must wait until the information becomes public to buy or sell such stock. The law imposes serious criminal and civil penalties and fines for individuals who violate it.

The Board of Directors, Executive Officers, the Leadership Team and certain other employees (referred to as **“Access Personnel”**) are further restricted from trading in the Company’s stock during the quarterly blackout period and also must obtain approval from the Executive Vice President, Chief Legal & Risk Officer or the Executive Vice President, Chief Financial Officer prior to purchasing or selling the Company’s stock.

Refer to the separate Securities Trading and Information Disclosure Policy or contact the Legal department for more information and guidance.



16. Customer and Employee Data Privacy

The Company respects and values its employees' and customers' privacy and expects you to do the same. You should maintain Personal Data with care and respect, while protecting against inappropriate access and disclosure and not use or transmit any personal data that comes into your possession through access by which you have as part of your job for your own benefit or in any other inappropriate way. If you suspect misuse of employee or customer personal information, notify your supervisor, the Legal department, or the Ethics Line (visit www.speakupcrocs.com to find a list of phone numbers by country or to make a report online).

We endeavor to comply with all applicable privacy laws, including laws regulating the privacy of personal, employment, financial or medical information. A variety of physical, electronic, and procedural safeguards exist to maintain the safety of this information. “**Personal Data**” such as social security numbers (“SSNs”), credit card numbers, bank account numbers, phone numbers, e-mail addresses, and personal health or medical information are collected only for legitimate business purposes and appropriate steps to safeguard it are taken, including limiting access and use to only that which is required by an employee (or third party contractor) to do their job. Specific information may be subject to special privacy rules or procedures. Read, understand and stay current on rules or procedures applicable to your job and also refer to our separate [Global Personal Data Policy](#) for additional information on privacy legislation and the handling of Personal Data.

A copy of our separate [Privacy Policy](#), which addresses the steps taken by the Company to protect customer privacy, may be obtained at www.crocs.com.

17. Sustainability and Community.

The Company is committed to becoming net zero by 2030 from its materials and operations to the products it produces. No matter what the Company team you are part of, it is important to endeavor to promote environmentally friendly and sustainable business practices.

Giving back to the community is core to the Company's values. The Company focuses on providing shoes, funds, and employee time to address timely human needs, support social inclusion and equality, and assist local communities. All employees are encouraged to participate in these efforts.



18. Reporting Violations of Law or Company Policy

To help protect the Company and individual employees, it is essential that you promptly and fully report any known or suspected violation(s) of the the law or the Code. There are many channels available to help you, including your supervisor, local Human Resources or Legal departments, or our Ethics Line. See Schedule A – Resources on the next page for contact information.

In order to facilitate a complete investigation of a suspected or known violation, be prepared to provide as much detail as possible, including a description of the questionable practice or behavior, the name(s) of people involved, name(s) of possible witnesses, dates, times, places, and any other available information.

Reports or complaints are referred to the Human Resources, Risk, or Legal Departments depending upon the nature and subject matter of the complaint, potential legal implications, or the individual(s) involved. When appropriate, the Company will provide the employee with the status of the investigation and the outcome. To the extent possible, the employee's confidentiality, and if applicable, desire to remain anonymous, will be protected consistent with applicable laws and the Company's need to investigate the matter. The Company strictly **prohibits retaliation** against an employee who, in good faith, seeks help or reports known or suspected violations.

Prompt and appropriate corrective action will be taken against the violator depending upon the circumstances of the case, up to and including termination of employment. Conduct that may result in disciplinary action, up to and including termination, includes: (i) violation of the law or Company policy, including requesting others to do so; (ii) failure to report a suspected violation of Company policy; (iii) failure to cooperate in an investigation; or (iv) retaliation against an employee who makes a complaint or cooperates in an investigation.

19. Administrative Matters Regarding the Code

Every employee of the Company shall be given access to a copy of the Code at the time of hire and on a regular basis thereafter, and is expected to read and acknowledge and become familiar with its contents. The Code is also posted on the Company's Internet and intranet websites, is available from the Human Resources and Legal departments, and will be included as an exhibit to the Company's annual report.

20. Audits

Compliance with Company policies may be monitored by periodic audits. These may be conducted by the Company's outside legal counsel or at the direction of the Executive Vice President, Chief Legal & Risk Officer, the Executive Vice President, Chief Financial Officer, or the Human Resources and Legal departments. All employees are required to co-operate fully with any such audits and to provide truthful and accurate responses to any request.

21. Conclusion

The Code reflects general principles to help guide and encourage employees to make ethical decisions. It is subject to revision at the sole discretion of the Company, and the Company reserves the right to amend, supplement, or discontinue the Code and the matters addressed herein, without prior notice at any time. Material amendments to the Code must be approved by the Board of Directors.

Schedule A – Resources

Regardless of how you choose to raise a question or concern, all reports will be taken seriously and handled confidentially to the extent practical and appropriate. Rest assured, you will not face retaliation for raising an issue in good faith.

Your Supervisor

In most cases, your supervisor will be in the best position to help you with questions or concerns since he or she understands your position and responsibilities.

Human Resources Department

The Human Resources department can help you with employment-related concerns, such as issues with a supervisor or another employee. To reach them, send an e-mail to hr@crocs.com.

Executive Vice President, Chief Financial Officer

If you have a concern about accounting, internal controls or auditing matters, you can bring to issue to our CFO. To reach her, send an e-mail to amehlman@crocs.com.

Legal Department

The Legal department, including the Executive Vice President, Chief Legal & Risk Officer, can advise you on issues related to the laws and regulations we must follow. The Legal department can also answer questions about any topic related to the Code or to discuss possible violations of the Code. To reach them, send an e-mail to legal@crocs.com.

Ethics Line

The Ethics Line is free, confidential and available 24 hours a day, seven days a week, to the Company's employees around the world. Calls are free and operators are equipped to take calls in the primary languages of the countries in which we do business. If you don't want to identify yourself, you can make a report anonymously. Each report is reviewed by a member of the Company's Ethics and Compliance team and assigned to an appropriate investigator.

To Contact the Ethics Line:

In the U.S. and Puerto Rico: 1-800-461-9330

In other countries, visit www.speakupcrocs.com to find a list of phone numbers by country or to make a report online.