

PLUME DESIGN, INC.

BUSINESS CODE OF CONDUCT

Revised on June 13, 2022

At Plume Design, Inc. (on behalf of itself, its affiliates and branch offices, “Plume” or the “Company”) honesty, integrity and legal compliance are key Plumian values that are integral to our culture, identity and brand. Officers, directors and employees, as well as distributors, consultants, agents, contractors, business partners and other third-party representatives of Plume that act on the Company’s behalf (collectively, “Covered Persons”), are expected to maintain the highest standards of honesty and integrity in the conduct of their responsibilities on behalf of the Company and to comply, at all times, with all applicable laws, regulations, accounting standards, and the Company’s policies and procedures.

The Company has an excellent reputation for conducting its business activities with integrity, fairness, and in accordance with the highest ethical standards. As a Covered Person, you enjoy the benefits of that reputation and are obligated to uphold it in every business activity. If you are ever in doubt as to whether an activity meets our ethical standards or compromises the Company's reputation, please discuss it with your supervisor(s).

Although no list advocating ethical behavior and cautioning against misconduct, no matter how carefully crafted, could cover every circumstance, the following is our Business Code of Conduct that has been designed to protect both the Company and our clients. Under this code each Covered Person shall:

- Conduct all aspects of Company business in an honest, ethical, and legal manner and obey the laws of the United States and of every state and locality where we conduct business, as well as non-U.S. laws applicable to our business.
- Conduct work on behalf of the Company with clients, the public and fellow Covered Persons with the highest standards of honesty, integrity and fairness.
- Be responsible for his/her actions and their consequences. No one will be excused from misconduct because another person ordered or asked the Covered Person to participate in misconduct.
- Alert his/her supervisor(s) or a senior manager whenever he/she observes, learns of or suspects any dishonest, destructive or illegal act.
- Respect the rights of all Covered Persons to fair treatment and equal opportunity without illegal discrimination or harassment of any type.
- Protect and maintain confidential information that belongs to the Company, its clients, suppliers and fellow Covered Persons.
- Ensure that all financial transactions and other documentation are handled honestly and recorded accurately, fairly and in reasonable detail. This commitment extends to the reporting and charging of time and business expenses.
- Avoid conflicts of interest, both real and perceived. Conflicts of interest are those outside activities or personal interests that could influence objective decisions made in the performance of your responsibilities.

- Comply with U.S., U.K. and other applicable anti-bribery and anti-corruption laws, as well as our policies and procedures, in all aspects of Company business in accordance with our zero tolerance policy with respect to bribery and corruption.
- Comply with U.S. and other applicable economic sanctions, export and import controls, and anti-money laundering laws, as well as our policies and procedures, in all aspects of Company business.
- Recognize that even the appearance of misconduct or improper behavior can be very damaging to our reputation.
- Cooperate fully in any investigation of misconduct.
- Understand that there are consequences for violating this Code. Consequences for violations may include reprimands, demotion, dismissal, termination of engagement or contract, or other actions as the Company determines to be appropriate.