

PLUME DESIGN, INC.
GLOBAL TRADE COMPLIANCE POLICY

Revised on June 13, 2022

Plume Design, Inc. (on behalf of itself, its affiliates and branch offices, “**Plume**” or the “**Company**”) is dedicated to fostering and maintaining the highest ethical standards and complying with applicable laws and regulations wherever it operates around the world. The United States and other countries implement laws and regulations for foreign policy and/or national security objectives, including economic and financial sanctions, export controls, customs/import controls, and anti-boycott laws and regulations (collectively, “**Trade Compliance Laws**”). Trade Compliance Laws generally impose compliance obligations and/or restrictions related to, among other things: dealings with certain sanctioned countries/territories, individuals or entities; exports of, in relevant part, dual use or otherwise sensitive hardware, technology/technical data, software (including certain types of commercial software with encryption functionality) (collectively, “**items**”) and services; import duties and/or labeling requirements; and restrictions on complying with certain government-supported boycotts (e.g., the Arab-league boycott of Israel).

The purpose of this Global Trade Compliance Policy (this “**Policy**”) is to affirm Plume’s commitment to compliance with Trade Compliance Laws. This Policy requires the Company’s officers, directors and employees (“**Team Members**”), as well as its distributors, consultants, contractors, business partners and any other third party representatives that act on the Company’s behalf (“**Third Party Representatives**”) to comply with U.S. and all other applicable Trade Compliance Laws governing the Company’s transactions and activities. Team Members and Third Party Representatives are collectively, “**Covered Persons.**”

To ensure compliance under U.S. and other applicable Trade Compliance Laws, Plume desires to heighten the information, communication and verification process relating to its international trade transactions. Every Covered Person engaged in any of the Company’s international operations is to become familiar with this Policy and any relevant implementing procedures or protocols. Further, it is the responsibility of every Covered Person involved in the import, export, or international sale or procurement of any products or services related to the Company’s business operations to be sufficiently familiar with U.S. and other applicable Trade Compliance Laws and to ensure such activities are in full compliance thereunder.

This Policy is implemented and overseen by the Company’s Chief Legal and Sustainability Officer (“**CLO**”) and may be amended at any time at the Company’s discretion. The Company does not expect Team Members and other Covered Persons to become experts in compliance with Trade Compliance Laws. However, the Company requires Covered Persons to seek guidance regarding any conduct that may present a risk of violating U.S. and other applicable Trade Compliance Laws or this Policy. **Please consult with the CLO or his/her designee should you have any questions or concerns.**

The Company implements risk-based procedures to assist Covered Persons in understanding their obligations to comply with this Policy and support Plume’s compliance with U.S. and other applicable Trade Compliance Laws. Such procedures are designed to assist Covered Persons to identify, prohibit, escalate and report to the CLO, and otherwise keep records pertaining to activities that may be governed by such laws. The Company’s procedures include a statement of commitment to compliance with Trade Compliance Laws by the Company’s management, as well as requirements related to export controls classification and licensing; activities or transactions potentially

involving sanctioned countries/territories, individuals or entities; training; recordkeeping; reporting and escalation of potential compliance concerns; and ongoing monitoring.