

Code of Conduct

Plan Your Edge LLC

a Schwartz Marketing Company

Effective date: December 10, 2024

Policy owner: Company Management

1 Purpose and responsibility

Plan Your Edge LLC (the Company) conducts business with integrity, professionalism, and respect. This Code establishes the conduct expected of our managers, employees, and persons acting on our behalf. The Company is owned by Schwartz Marketing & Consulting LLC.

These expectations apply to interactions with colleagues, customers, suppliers, business partners, public officials, and communities. We expect contractors and suppliers to uphold comparable standards in their work with us. Everyone covered by this Code must understand it, use sound judgment, and raise concerns when conduct appears inconsistent with it.

2 Honest and lawful business practices

Comply with applicable laws, contractual obligations, and Company policies. Describe services, capabilities, deliverables, and limitations accurately. Do not make misleading claims about product performance, availability, certifications, security, or affiliations. Only authorized representatives may enter into commitments on the Company's behalf.

Competition must be fair. Do not agree with competitors to fix commercial terms, divide customers or territories, coordinate bids, or improperly exchange competitively sensitive information. Obtain business information through lawful and ethical means. Follow applicable trade restrictions and seek guidance before transactions that raise sanctions or export-control concerns.

3 Respect dignity and fair treatment

Treat people with dignity and courtesy. Discrimination, harassment, bullying, threats, violence, and retaliation are prohibited. Employment and work decisions must be based on relevant qualifications, performance, and legitimate business needs, without unlawful discrimination.

Respect human rights, lawful labor protections, freedom of association, and collective bargaining rights. Do not use or tolerate forced labor, human trafficking, or unlawful child labor. Follow our Human Rights Policy and promptly report safety hazards or abusive conditions.

4 Conflicts of interest

Disclose personal, family, financial, or outside-business interests that could affect, or reasonably appear to affect, impartial judgment. Examples include selecting a relative's business as a supplier, accepting personal benefits from a customer, or directing Company opportunities to a business in which you have an interest.

Disclosure does not automatically prohibit a relationship. Management must assess the situation and establish appropriate safeguards. Anyone with a conflict must not approve the affected transaction. Do not use Company information, assets, or authority for undisclosed personal gain.

5 Bribery gifts and business courtesies

Never offer, accept, request, or authorize a bribe, kickback, or improper benefit, directly or through a third party. Follow the Anti-Corruption Policy, including its restrictions on cash-equivalent gifts, facilitation payments, and approval of gifts, hospitality, and travel.

Business courtesies must have a legitimate purpose and must not improperly influence a decision. Record expenses accurately, and seek guidance before acting when the circumstances are unclear. Commercial pressure does not excuse misconduct.

6 Confidentiality privacy and intellectual property

Protect confidential Company, customer, supplier, and partner information. Access, use, and share information only for authorized business purposes and only with persons who need it. Confidentiality obligations continue after a working relationship ends, subject to applicable law.

Collect and use personal information only as authorized and necessary for the relevant purpose. Follow applicable privacy notices, contractual requirements, and access controls. Do not disclose passwords, authentication codes, customer files, or confidential data through unapproved tools or public channels.

Respect software licenses, copyrights, trademarks, trade secrets, and other intellectual property. Obtain permission before reusing another party's materials or presenting a third-party brand as endorsing the Company. Nothing here restricts legally protected discussions, reporting to authorities, or cooperation with investigations.

7 Responsible use of technology and Company resources

Use Company systems, accounts, funds, and equipment responsibly. Protect credentials, use approved access methods, and promptly report suspected compromise, data loss, unauthorized access, or accidental disclosure. Do not bypass safeguards or test systems without authorization.

Validate material assumptions, inputs, calculations, and outputs before providing work to customers. Automated tools can contain errors or incomplete information. Do not present preliminary designs or generated documents as independently certified or approved when they are not.

Use artificial intelligence and other external tools only within approved business practices. Do not upload confidential or personal information without authorization and appropriate safeguards. Review generated work for accuracy, appropriate use, and third-party rights.

8 Accurate records and responsible operations

Keep records that accurately reflect transactions, decisions, services, expenses, and approvals. Never falsify information, hide funds, misrepresent work performed, or destroy records to obstruct a review. Retain records as required and preserve relevant materials when an investigation or dispute is anticipated.

Use resources responsibly, reduce unnecessary waste where practical, and comply with applicable environmental and workplace safety requirements. Environmental claims must be specific, supportable, and consistent with actual practices.

9 Reporting concerns

Raise questions or suspected violations promptly with Company management or contact@planyouredge.com. Reports may also be made at +1 305-320-3343. Describe the facts as accurately as possible and preserve relevant information lawfully. Proof is not required before raising a concern in good faith.

If the concern involves the usual management contact, approach another uninvolved manager or an authorized representative of Schwartz Marketing & Consulting LLC. A person implicated in a report must not direct its review. You may also seek independent legal advice or report lawfully to authorities without Company approval.

10 Protection from retaliation and fair review

The Company prohibits retaliation against anyone who reports a concern in good faith, refuses to participate in suspected misconduct, or cooperates honestly with a review. Protection applies even if a concern is not substantiated. An honest mistake is not a knowingly false report.

Management will assess concerns promptly and arrange an impartial review appropriate to the circumstances. Information will be shared only as reasonably needed to address the concern or satisfy legal obligations. Absolute confidentiality cannot be guaranteed.

All covered persons must cooperate honestly, preserve relevant records, and refrain from obstructing a review. Corrective action will address both misconduct and any identified weaknesses in processes or controls.

11 Accountability and implementation

Managers must model ethical behavior, communicate expectations, provide guidance appropriate to each role, and act on concerns. No business result justifies directing another person to violate this Code.

Violations may lead to disciplinary action, including termination of employment, or suspension or termination of a business relationship, subject to applicable law and contractual rights. The Company may refer matters to authorities when appropriate or required.

Management will periodically review this Code and related policies. This Code establishes conduct expectations; it does not replace applicable law or create a guarantee of continued employment. Where a requirement is unclear or may conflict with law, seek guidance before acting.

Contact: contact@planyouredge.com | +1 305-320-3343