

REALM THERAPEUTICS PLC



CODE OF CONDUCT

1.1 Introduction

Realm Therapeutics plc (the “*Company*” or “*Realm*”) values its reputation and recognizes the importance of its ethical responsibilities. We strongly believe that our success is largely predicated on a Company culture that fosters mutual respect for the rights and dignity of our fellow employees and business partners and upholds strong standards. Accordingly, this Code of Conduct (“*Code*”) has been adopted in order to provide all employees with clear guidelines relating to their conduct as representatives of the Company. This Code is intended to promote open communication within the workplace and encourage honesty and fairness. All directors, officers and employees of Realm and its subsidiaries must sign a Certificate of Receipt and Understanding of Realm’s Code of Conduct, which is attached to this Code, prior to commencing employment with the Company and thereafter upon request. The Code addresses conduct that is particularly important to proper dealings with the people and entities with whom we interact, but reflects only a part of our commitment. From time to time we may adopt additional policies or procedures with which our personnel are expected to comply, if applicable to them. The Company’s Anti-Bribery Policy and Whistleblower Policy & Procedure for Reporting and Investigating any Breach of the Code of Conduct (“*Whistleblower Policy*”) serve as a supplements to this Code.

Where there is no stated guideline in the Code or otherwise, it is your responsibility to apply common sense, together with your own highest personal ethical standards, in making business decisions. By working at the Company, you agree to comply with the Code and to revisit and review it regularly and whenever we notify you of any material updates. If you don’t agree to comply, please let us know immediately. Violations of the Code will not be tolerated. Anyone who violates the standards in the Code may be subject to disciplinary action. You should not hesitate to ask questions about whether any conduct may violate the Code, voice concerns or clarify gray areas.

This Code applies to all directors, officers and employees of Realm and its subsidiaries. All references to “*you*,” and “*your*” shall refer to anyone subject to this Code unless otherwise provided herein. The general areas of conduct covered by this Code include, but are not limited to:

- protecting proprietary and confidential information;
- compliance with laws and Company policies;
- appropriate and complete financial and other disclosures in public documents;
- avoiding conflicts of interest; and
- timely and thorough reporting of potential violations of this Code.

1.2 Honest and Ethical Conduct

It is our policy to promote high standards of integrity by conducting our affairs in an honest and ethical manner. The integrity and reputation of the Company depends on the honesty, fairness and integrity brought to the job by each person associated with us. Unyielding personal integrity is the foundation of corporate integrity.

1.3 Proprietary and Confidential Information

1.3.1 Confidentiality Obligations

You may learn of information about the Company that is non-public, confidential or proprietary. This includes any and all confidential and/or proprietary knowledge, data or information of the Company, its affiliates, parents and subsidiaries, which has economic value as a result of its remaining confidential, whether having existed, now existing, or to be developed during employment by or association with the Company, including information developed by Company employees in the course of your employment. You are expected to hold in strictest confidence and not disclose, use, lecture upon or publish any of such information, except as such disclosure, use or publication may be required in connection with your work for the Company, or, if you are an employee of the Company, unless an officer of the Company expressly authorizes such in writing. Employees' responsibilities relating to confidential information of Realm are described more specifically in the Proprietary Information, Inventions, Non-Solicitation and Non-Competition Agreement.

1.3.2 Assignment of Inventions and Proprietary Information

Each Realm employee has agreed to assign all of his or her rights, title and interests in inventions during his or her employment by the Company. The details of this assignment are spelled out in the Proprietary Information, Inventions, Non-Solicitation and Non-Competition Agreement.

1.4 Maintenance of Corporate Books, Records, Documents and Accounts; Financial Integrity; Public Reporting

The integrity of our records and public disclosure depends upon the validity, accuracy and completeness of the information supporting the entries in our books of account. Therefore, our corporate and business records should be completed accurately and honestly. The making of false or misleading entries, whether they relate to financial results or otherwise, is strictly prohibited. Our records serve as a basis for managing our business and are important in meeting our obligations to our partners, local business customers, contributors, creditors, employees and others with whom we do business. As a result, it is important that our books, records and accounts accurately and fairly reflect, in reasonable detail, our assets, liabilities, revenues, costs and expenses, as well as all transactions and changes in assets and liabilities. We require that:

- no entry be made in our books and records that intentionally hides or disguises the nature of any transaction or of any of our liabilities or misclassifies any transactions as to accounts or accounting periods;
- transactions be supported by appropriate documentation;
- the terms of commercial transactions be reflected accurately in the documentation for those transactions and all such documentation be reflected accurately in our books and records;
- personnel comply with our system of internal controls; and
- no cash or other assets be maintained for any purpose in any unrecorded or "off-the-books" fund.

Our accounting records are also relied upon to produce reports for our management, holders of our securities and creditors, as well as for governmental agencies. In particular, we rely upon our accounting and other business and corporate records in preparing the periodic and current reports that we file with governmental and other regulatory authorities. Securities laws require that these reports provide full, fair, accurate, timely

and understandable disclosure and fairly present our financial condition and results of operations. Anyone who collects, provides or analyzes information for or otherwise contributes in any way in preparing or verifying these reports should strive to ensure that our financial disclosure is accurate and transparent and that our reports contain all of the information about the Company that would be important to enable holders of our securities and potential investors to assess the soundness and risks of our business and finances and the quality and integrity of our accounting and disclosures. In addition:

- you may not knowingly take or authorize any action that would cause our financial records or financial disclosure to fail to comply with generally accepted accounting principles, the rules and regulations of governmental and other regulatory authorities or other applicable laws, rules and regulations;
- you must cooperate fully with our accounting and audit teams, as well as our independent public accountants and counsel, respond to their questions with candor and provide them with complete and accurate information to help ensure that our books and records, as well as our reports filed with governmental and other regulatory authorities, are accurate and complete; and
- you should not knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of our reports filed with the UK Financial Conduct Authority, London Stock Exchange plc, SEC or the Nasdaq Stock Market, or knowingly omit (or cause or encourage any other person to omit) any information necessary to make the disclosure in any of our reports accurate in all material respects.

If you who become aware of any departure from these standards, you have a responsibility to report your knowledge promptly to a supervisor, the Compliance Officer, the Audit Committee or one of the other compliance resources or in accordance with the provisions of the Company's Whistleblower Policy.

1.5 Compliance With Laws

Obeying the law is the foundation of the Code. Our success depends upon our personnel operating within legal guidelines and cooperating with local, national and international authorities. We expect our personnel to understand the legal and regulatory requirements applicable to their business units and areas of responsibility. While we do not expect you to memorize every detail of these laws, rules and regulations, we want you to be able to determine when to seek advice from others. If you have a question about legal compliance, you must seek an answer from your supervisor or the Compliance Officer.

Disregard of the law will not be tolerated. Violation of laws, rules and regulations of any country may subject an individual, as well as the Company, to civil and/or criminal penalties. You should be aware that conduct and records, including emails, are subject to internal and external audits and to discovery by third parties in the event of a government or regulatory investigation or civil litigation. It is in everyone's best interests to know and comply with our legal obligations.

1.5.1 Unlawful Harassment; Interactions with Fellow Employees

The Company's Anti-Harassment policies, reporting and investigation procedures are outlined below.

ANTI-HARASSMENT POLICY

Realm is committed to maintaining a work environment that reflects our core values and in which all team members are treated with respect and dignity. Inappropriate workplace behavior, including unlawful harassment, is wholly inconsistent with this commitment and is prohibited. Harassment is not only behavior

that is directed at an individual, but also behavior that creates an intimidating, hostile, or offensive working environment. Harassment expresses disrespect, abuses authority, exploits, undermines relationships based on trust, and interferes with productive work. Moreover, depending on the circumstances, it may violate laws prohibiting discrimination and harassment. All Realm employees should have a work environment free from discrimination and harassment based on race, color, religion, ancestry, disability, age, sex, sexual orientation, national origin, familial status, veteran status, or any other basis prohibited by law.

Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual or gender-based nature when submission to such conduct is either explicitly or implicitly made a term or condition of an individual's employment, submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual or such conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile, or offensive working environment. Sexually harassing conduct also includes, but is not limited to:

- sexual flirtations, touching, advances, or propositions;
- verbal abuse of a sexual nature;
- sexually graphic or suggestive comments about an individual's attire or body;
- sexually degrading words to describe an individual;
- the display, in any work environment, of sexually suggestive objects or pictures, including nude photographs;
- promising favorable employment actions (such as raises or promotions) in exchange for romantic or sexual relations or threatening adverse employment actions (such as demotion or terminations) if an employee refuses to submit to requests for romantic or sexual relations; and
- printing, displaying, downloading or sending offensive, insensitive, or sexually suggestive messages, images, jokes, or pictures (including nude photographs) using email or the Internet or any of the Company's computers or communication systems.

Other discriminatory harassment includes verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, gender, sexual orientation, age, religion, national origin, disability, veteran status or any other characteristic protected by law, and that creates an intimidating, hostile, or offensive work environment or unreasonably interferes with an individual's work performance.

Application of Policy

Each of us has the responsibility to maintain the work environment free of any form of prohibited harassment or discrimination, sexual or otherwise. This policy applies to any sexual and other prohibited harassment, regardless of whether that harassment occurs on or off the Company's premises. Any individual who is found to have engaged in acts of discrimination or harassment will face disciplinary action, based upon the specific circumstances, up to and including termination.

Reporting Procedure

If you believe that you are experiencing discrimination, sexual or other prohibited harassment being harassed, you must first inform the individual exhibiting the behavior about the harassing behavior and the negative impact of the behavior on you. If that does not rectify the issue then the individual should report the offending conduct to the head of Human Resources or to his or her immediate Supervisor. All Supervisors are required to communicate any reported incidents to Human Resources as soon as practical, but no more than 24 hours after receipt of the report. Any complaint of prohibited discrimination or harassment involving the head of Human Resources should be reported directly to the Chief Executive Officer or Chief Financial Officer. All complaints will be promptly investigated and confidentiality will be

maintained to the extent possible. In all cases, the complaining individual will be advised of the relevant findings and conclusions.

If the complaining individual is not satisfied with the handling of the complaint or the corrective action taken by the head of Human Resources, the individual should bring the complaint to the attention of the Chief Executive Officer directly.

You will not be discharged, terminated, or retaliated against in any manner because you complained about sexual harassment or other prohibited harassment or discrimination, or cooperated in any way with an investigation of a complaint of harassment or discrimination, unless the complaint is found to be false or made in bad faith.

1.5.2 Health, Safety and Environmental Issues

You have ethical and legal obligations to watch for and promptly report health, safety and environmental concerns to the head of Human Resources. Prompt reporting is important because the Company needs and wants to comply with any applicable laws or regulations and create a safe environment for employees, business partners and customers and protect against any environmental harm. Anyone who is found to have ignored, covered up or failed to report a serious health, safety or environmental problem may be subject to a substantial fine or imprisonment.

1.5.3 Insider Dealing; Realm Securities Dealing Code

Realm has adopted a Securities Dealing Code to ensure that you and other insiders comply fully with all applicable laws and guidelines when dealing in ordinary shares or American Depositary Shares (or related financial instruments) (the “*Securities*”) of Realm. The Code summarizes various standards and restrictions on dealing in the Securities by you. This Code has been issued to you and should be retained by you. It is critical that you carefully read, understand and adhere to the provisions of Company’s Securities Dealing Code. If you have any questions about this policy please contact the Compliance Officer.

1.5.4 Anti-Bribery Policy

Realm has adopted an Anti-bribery Policy which has been issued to you and should be retained by you.

1.5.5 Other Laws

Realm and you shall comply fully with all applicable laws, regulations and guidelines relating to Realm’s business in any place in the world which are established by organizations (public and private) which have oversight over Realm’s business including, without limitation, U.S. Food and Drug Administration, European Medicines Agency, Environmental Protection Agency, Medicines and Healthcare Products Regulatory Agency, International Organization for Standardization, Underwriters Laboratories, NSF International, HTM2030 and prEN15883-4. Certain U.S. laws, rules and regulations, which extend to all our activities outside the U.S., include: U.S. Embargoes, which generally prohibit U.S. companies, their subsidiaries and their employees from doing business with, or traveling to, countries subject to sanctions imposed by the U.S. government (currently, Crimea, Cuba, Iran, North Korea and Syria), as well as doing business with specific companies and individuals identified on lists published by the U.S. Treasury Department; U.S. Export Controls, which restrict exports from the U.S. and re-exports from other countries of goods, software and technology to many countries, and prohibit transfers of U.S.-origin items to denied persons and entities; and Anti-boycott Regulations, which prohibit U.S. companies from taking any action that has the effect of furthering or supporting a restrictive trade practice or boycott imposed by a foreign country against a country friendly to the U.S. or against any U.S. person.

1.6 Compliance With Other Company Policies

1.6.1 Use of Company Resources

Company resources, including computers, faxes, telephones, and internet access, are intended for company-related business use; however, Realm understands that you may sometimes use such resources for limited personal interests. Such personal use should be limited to a reasonable amount and should be consistent with the standards set forth in this Code, including the above-mentioned policies regarding harassment. Any defamatory, insulting or derogatory remark about any person or group of persons is prohibited. Anyone who violates this policy may be subject to disciplinary action, up to and including termination. Company reserves the right to examine, use, copy and/or delete user files for purposes consistent with Company business interests.

1.6.2 Legal Process and Actions

From time to time, Realm may be involved in various types of litigation or legal action. Realm may first receive notice of actual or threatened legal action in the form of a letter or in the form of a summons and complaint. If you receive any such notification or threat of a lawsuit against Realm or against you acting in your capacity at the Company, you must immediately report such notification to the Chief Executive Officer.

Prompt reporting is important because claims and lawsuits typically impose deadlines which require immediate attention in order to avoid serious negative consequences. The Chief Executive Officer is the only one authorized to accept a summons or subpoena on behalf of the Company. If you are ever asked to accept a summons or subpoena, you should politely decline and refer the matter to the Chief Executive Officer.

Nothing in this policy prohibits you from communicating with or providing information to, from filing a proceeding with, or from testifying, participating or assisting in an investigation or proceeding brought by, any governmental or regulatory body or official, including any such investigation or proceeding relating to individual workplace rights or to an alleged violation of any laws, regulations or guidelines. It is the Company's preference that you inform the head of Human Resources in the event that you have been in contact with any such governmental authority. It is important that you understand that you may not be required to speak with investigators and you may have the right to request the opportunity to confer with a Realm representative, and if appropriate, to retain private counsel.

1.6.3 Campaign Contributions

Realm does not currently make campaign contributions. Any exception to this policy must be approved by the Chief Executive Officer, subject to verification of its legality. Realm considers individual political contributions or involvement to be a matter of personal choice. The Company does not solicit or inquire as to individual political contributions and will not reimburse you for such contributions.

1.6.4 Solicitation

Generally, the Company does not object to limited solicitation of fellow employees for matters of personal interest, provided that such requests for support are not offensive, unrelated to politics or religion, tasteful, voluntary, presented in a professional matter, limited to small financial amounts and not unduly onerous.

1.6.5 Drugs and Alcohol in the Workplace

Realm's goal is to provide and maintain a drug-free workplace and to provide a safe and productive work environment. The use, sale, solicitation for sale, manufacture, transfer, possession of or being under the influence of drugs or alcohol during working hours or on Company property is strictly prohibited. The only exception to this policy is when alcohol is served at certain limited Company functions such as holiday parties or customer events. In those events, alcohol should be consumed in moderation and an appropriate level of professionalism should be maintained. Nobody, including guests, must under any circumstances drive under the influence of alcohol and must observe all related laws. The Company will not tolerate

violations of this policy at any level and reserves the right to conduct testing as appropriate. Anyone who violates this policy will be subject to disciplinary action, which may include suspension and termination.

1.7 Financial Issues

1.7.1 *Reliability of Realm's Financial and Business Records; Public Disclosure*

As a company with publicly traded securities, Realm has certain legal reporting and disclosure obligations. All employees, consultants, officers and directors must take all appropriate steps to ensure that any information that is disclosed to the public is accurate, reliable and complete.

Accordingly, those responsible for Realm's financial and records must maintain such records in accordance with applicable legal requirements, proper accounting principles and Company standards. Realm's financial records must accurately describe relevant transactions and such records must be supported by adequate documentation. False or misleading entries in financial records are strictly forbidden and no information may be concealed from the Company's external auditors. Revenue and expenses must be properly recognized on a timely basis and assets and liabilities must be properly valued and recorded.

Anyone involved in maintaining Realm's financial and business records must follow the Company's financial policies in doing so. Additionally, you have a duty to provide complete and accurate information to the Company's finance department. Anyone who becomes aware of any omission, inaccuracy or falsification of information must promptly report the situation to either the Chief Financial Officer, the Chief Executive Officer or the head of Human Resources. Any inaccurate reporting of information will be investigated and appropriate action, including potential termination, will be taken to ensure the integrity of the Company's financial and business records.

1.7.2 *Falsification of Records and Misuse of Company Funds*

Intentional acts of record falsification and theft or misuse of company funds and/or property (for personal gain) will not be tolerated. Immediate disciplinary action up to and including termination will be the result of such behavior. Examples of this type of behavior include but are not limited to: falsifying a regulatory record, financial document or other company document; stealing or borrowing from company funds (for personal use); excessive or unapproved use of company assets including, but not limited to, facilities, computers and software, office supplies, equipment and inventory for personal gain rather than company business; and intentionally providing inaccurate or false information.

1.7.3 *Guidelines for Employees with Financial Reporting Responsibilities*

There are specific responsibilities held by the Company's finance department. The finance department includes the Chief Executive Officer, the Chief Financial Officer, the Corporate Controller, and all employees involved with Realm's finances (collectively referred to as the "**Finance Department**"). The Finance Department has to comply with a variety of reporting requirements to ensure that accurate information is being relayed to the holders of the Company's securities. Accordingly, members of the Finance Department will be held to a high standard of conduct and will be expected to:

- strictly comply with the ethical rules and responsibilities outlined in this Code when dealing with other people both professionally and personally;
- supply accurate and complete information to other Realm employees, consultants, officers and directors who file reports with governmental and other regulatory authorities;
- model appropriate and ethical behavior in the work environment.

If a member of the Finance Department violates this Code, there will be severe disciplinary consequences, including without limitation, termination of employment and being reported to governmental and other regulatory authorities, as appropriate.

1.8 Avoiding Conflicts of Interest; Honesty and Integrity

1.8.1 Limitation on Receipt of Gifts

A large part of Realm's success is related to its ability to build and maintain strong business relationships not only with Realm employees, but also with our key consultants, customers, suppliers and business partners. It is important that those who deal with the Company feel confident and secure that the relationships are fair, honest and based on mutual respect. Realm's commitment to ethical business practices requires that you know the Company's policy regarding these relationships.

It is sometimes customary for persons or companies involved in a business relationship to exchange gifts or other gratuities. For instance, during the course of a business relationship, the parties may conduct meetings over lunch or dinner, the celebration of a deal may facilitate the exchange of novelties bearing the company logo, or during the holidays, one party may invite the other to a holiday event. The appropriateness of exchanging such gratuities will depend on the particular circumstance. To protect Realm and its personnel from possible claims of bribery or special treatment, appropriate guidelines must be followed with respect to such exchanges. Note that, in general, Realm's policy is never to accept any gift or prize donation in connection with an upcoming Company event. Unless express permission is received from the Chief Executive Officer, Chief Financial Officer, the Compliance Officer or the Audit Committee, gifts and entertainment cannot be offered, provided or accepted by any personnel unless consistent with customary business practices and not (a) of more than \$200.00 in monetary value, (b) in cash, (c) susceptible of being construed as a bribe or kickback, (d) made or received on a regular or frequent basis or (e) in violation of any laws. This principle applies to our transactions everywhere in the world, even where the practice is widely considered "a way of doing business." Personnel should not accept gifts or entertainment that may reasonably be deemed to affect their judgment or actions in the performance of their duties. Our partners, suppliers, contributors, consumers and the public at large should know that your judgment is not for sale.

When engaging in business entertainment, keep in mind that you shall not offer or receive a bribe. A bribe includes any money or thing of value that is given to another to induce a person to award favorable treatment in a business context. If you are offered a bribe, you should immediately contact either the head of Human Resources, the Chief Executive Officer or any other appropriate member of management.

If you are entertaining someone for business purposes, then certain legislative rules and regulations would apply. Use of company-issued credit cards and company funds must be in accordance with the applicable company business expense policies and certain legislative rules and regulations.

Also, note that, in the healthcare area, there are a variety of laws in place which specifically penalize actions relating to payments and gifts. For example, it is prohibited to knowingly offer something of value to induce a healthcare provider to use a product for which the government provides reimbursement.

1.8.2 Conflicts of Interest

Employment by Realm carries with it a responsibility to be aware of the importance of ethical conduct. You must refrain from taking part in, or exerting influence on, any transaction in which you may have a divided loyalty – where your own interests may conflict with the best interests of Realm.

Exactly what constitutes a conflict of interest or an unethical business practice is both a moral and a legal question. The Company recognizes and respects your right to engage in activities outside your employment which are private in nature and do not in any way conflict with, or reflect poorly on, the Company. It is your responsibility to notify Realm of a potential conflict of interest. Realm reserves the right to determine

when your activities represent a conflict with the Company's interests and to take whatever action is necessary to resolve the situation—including terminating your employment.

It is not possible in a general policy statement of this sort to define the various circumstances and relationships that would be considered “unethical.” The list below suggests some of the types of activity that would reflect in a negative way on your personal integrity or that would limit your ability to discharge job duties and responsibilities in an ethical manner. The following list is not exhaustive and should be reviewed only as examples of inappropriate behavior constituting a conflict of interest:

- simultaneous employment by another company, entity, or individual, particularly if the other firm is a competitor or supplier;
- carrying on Company business with a company, entity, or individual in which you, or a close relative, has a substantial ownership or interest, without proper disclosure and request for permission from the CEO;
- borrowing money from any company, entity, or individual, other than recognized loan institutions, from which the Company buys services, materials, equipment, or supplies;
- speculating or dealing in materials, equipment, supplies, services, or property purchased by the Company;
- participating in organization activities including, but not limited to, civic or professional organizations in a manner whereby confidential Company information is divulged;
- misusing or revealing privileged information or revealing confidential data;
- using your position in the Company or knowledge of its affairs for personal financial or social gain;
- engaging in practices or procedures that violate anti-trust laws or other laws regulating the conduct of Company business; or
- accepting any excessive gift, gratuity, or favor of any kind for themselves or their families given by suppliers of services of the Company for the purpose of soliciting or keeping the business of the Company.

Please note that the examples listed above extend to conflicts involving the personal interests of your family members and significant others. In addition, please note that no loans may be made by Realm to any director or officer of the Company, and all loans and guarantees by the Company must be approved in advance by the Company's Board of Directors or the Audit Committee because of the potential for conflicts of interest.

If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, and you are not an officer or director of the Company, you should discuss the matter with your supervisor or the Compliance Officer. Supervisors may not authorize conflict of interest matters or make determinations as to whether a problematic conflict of interest exists without first seeking the approval of the Compliance Officer and providing the Compliance Officer with a description of the activity. If the supervisor is involved in the potential or actual conflict, you should discuss the matter directly with the Compliance Officer. Officers and directors may seek authorizations and determinations from the Audit Committee of our Board of Directors.

1.8.3 Disclosure of Conflicts of Interest

With respect to executive officers and directors of the Company, notwithstanding anything to the contrary herein, the only actions or relationships that shall be deemed conflicts are those that meet the requirement for disclosure in the company's periodic filings with the SEC pursuant to Item 404 of Regulation S-K or pursuant to the AIM Rules for Companies, as applicable (“**Related Party Transactions**”). Related Party Transactions shall be approved by the Audit Committee as required by applicable laws and regulations, and

provided such approval is obtained in advance and such transactions are publicly disclosed, such approval shall be deemed a waiver of this Code.

Directors of the Company also have duties under the U.K. Companies Act 2006 to declare to the other directors the nature and extent of his or her interest in (i) a proposed transaction or arrangement with the Company and (ii) an existing transaction or arrangement with the Company.

1.8.4 Corporate Opportunities

You may not take personal advantage of opportunities for the Company that are presented to you or discovered by you as a result of your position with us or through your use of corporate property or information. Even opportunities that are acquired privately by you may be questionable if they are related to our existing or proposed lines of business. You may not use your position with us or corporate property or information for improper personal gain, nor should you compete with us in any way in accordance with the Proprietary Information, Inventions, Non-Solicitation and Non-Competition Agreement you have separately executed.

1.8.5 Fair Dealing

We strive to outperform our competition fairly and honestly. Advantages over our competitors are to be obtained through superior performance of our products and services, not through unethical or illegal business practices. Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited, even if motivated by an intention to advance our interests. If information is obtained by mistake that may constitute a trade secret or other confidential information of another business, or if you have any questions about the legality of proposed information gathering, you must consult your supervisor or the Compliance Officer.

You shall deal fairly and in good faith with Realm's customers, suppliers, partners, consultants and other employees. Any form of manipulation, deceit, threat or other form of taking advantage will not be tolerated. Be aware that the U.S. Federal Trade Commission Act provides that "unfair methods of competition in commerce, and unfair or deceptive acts or practices in commerce, are declared unlawful." It is a violation of the Act to engage in deceptive, unfair or unethical practices and to make misrepresentations in connection with sales activities.

1.9 Waivers

Any waiver of this Code for executive officers (including, where required by applicable laws, our principal executive officer, principal financial officer, principal accounting officer or controller (or persons performing similar functions)) or directors may be authorized only by the Board or, to the extent permitted by the rules of The Nasdaq Stock Market LLC, the AIM Rules for Companies or the EU Market Abuse Regulation, as applicable, a committee of the Board and will be disclosed to holders of the Company's securities as required by applicable laws, rules and regulations.

1.10 Reporting Violations of this Code

1.10.1 Compliance Resources

We have established the position of Compliance Officer to oversee this program. The Compliance Officer is a person to whom you can address any questions or concerns. The Compliance Officer, Joseph William Birkett, can be reached by telephone at [REDACTED]. In addition to fielding questions or concerns with respect to potential violations of the Code, the Compliance Officer is responsible for:

- investigating possible violations of the Code;
- ensuring that training is conducted for new or existing personnel in the Code policies;
- updating the Code as needed and alerting personnel to any updates, with appropriate approval of the Audit Committee, to reflect changes in the law, Company operations and in recognized best practices, and to reflect the Company experience; and
- otherwise promoting an atmosphere of responsible and ethical conduct.

Your most immediate resource for any matter related to the Code is your supervisor. He or she may have the information you need or may be able to refer the question to another appropriate source. There may, however, be times when you prefer not to go to your supervisor. In these instances, you should feel free to discuss your concern with the Compliance Officer. A dedicated email address for the Compliance Officer is available to those who wish to seek guidance on specific situations or report violations of the Code, or to ask questions about the Company's policies: visit [REDACTED]. If your concern involves potential misconduct by another person and relates to questionable accounting or auditing matters at the company, you should report that violation to the Compliance Officer pursuant to the Company's Whistleblower Policy.

If you prefer to leave an anonymous message for the Compliance Officer, you may do so by calling our toll-free hotline at [REDACTED], although the Compliance Officer will be unable to obtain follow-up details from you that may be necessary to investigate the matter. Whether you identify yourself or remain anonymous, your telephonic contact will be kept strictly confidential to the extent reasonably possible within the objectives of the Code.

1.10.2 Clarifying Questions and Concerns; Reporting Possible Violations

If you encounter a situation or are considering a course of action and its appropriateness is unclear, you should discuss the matter promptly with your supervisor or the Compliance Officer. Even the appearance of impropriety can be very damaging and should be avoided.

If you are aware of a suspected or actual violation of the Code standards by others, you have a responsibility to report it. You are expected to promptly provide a compliance resource with a specific description of the violation that you believe has occurred, including any information you have about the persons involved and the time of the violation. Whether you choose to speak with your supervisor or the Compliance Officer, you should do so without fear of any form of retaliation. We will take prompt disciplinary action against anyone who retaliates against you, which may include termination of employment.

Supervisors must promptly report any complaints or observations of Code violations to the Compliance Officer. If you believe your supervisor has not taken appropriate action, you should contact the Compliance Officer directly. The Compliance Officer will investigate all reported possible Code violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances. Neither you nor your supervisor may conduct any preliminary investigation, unless authorized to do so by the Compliance Officer. Your cooperation in the investigation will be expected. As needed, the Compliance Officer will consult with outside counsel, the Human Resources department and/or the appropriate committee of the Board. It is our policy to employ a fair process by which to determine violations of the Code.

With respect to any complaints or observations of violations that may involve accounting, internal accounting controls and auditing concerns under the Company's Whistleblower Policy, the Compliance Officer shall promptly inform the Audit Committee, and the Audit Committee shall be responsible for supervising and overseeing the inquiry and any investigation that is undertaken.

If any investigation indicates that a violation of the Code has probably occurred, we will take such action as we believe to be appropriate under the circumstances. If we determine that you are responsible for a Code violation, you will be subject to disciplinary action up to, and including, termination of employment and, in appropriate cases, civil action or referral for criminal prosecution. Appropriate action may also be taken to deter any future Code violations.

1.11 Conclusion

This Code outlines the types of legal and ethical challenges you may encounter during your employment with the Company. This Code is not comprehensive, but is intended to alert you to legal and ethical issues that are important for you to keep in mind as you perform your work for Realm. Recognizing and avoiding problems in these areas is essential to the Company's success and your success at Realm. Violations in these policies may result in disciplinary action including suspension and termination of employment. This Code, as applied to the Company's principal financial officers, shall be our "code of ethics" within the meaning of Section 406 of the Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder. If you have any questions, concerns or would like clarifications concerning the issues raised in this Code please feel free to contact the Chief Executive Officer, Chief Financial Officer or Compliance Officer.

Certificate of Receipt and Understanding of Realm's Code of Conduct dated June 2018

I have read and understand the Code of Conduct, and I hereby agree to comply with its terms.

Each person signing a Certificate of Receipt and Understanding of Realm's Code of Conduct is responsible for keeping his/her Certificate current, as requested. These statements will be kept in the Company's Human Resource files.

Signature

Name

Date