BESPOKE EXTRACTS, INC.
CODE OF BUSINESS CONDUCT AND ETHICS

Adopted by the Board of Directors on July 10, 2026

1.1 Scope

This Code of Business Conduct and Ethics (this "Code") applies to all directors, officers, and employees of Bespoke Extracts, Inc. ("Bespoke"), as well as to the directors, officers, and employees of each subsidiary of Bespoke, including Bespoke Extracts Colorado, LLC, doing business as The Joint Company. Such directors, officers, and employees are referred to herein collectively as the "Covered Parties." Bespoke and its subsidiaries are referred to herein collectively as the "Company." This Code applies to the Company's principal executive officer, principal financial officer, and principal accounting officer, and is intended to constitute a "code of ethics" within the meaning of Item 406 of Regulation S-K. This Code supersedes the code of ethics previously adopted by the Company.

2.1 Purpose

The Company is committed to conducting business with honesty and integrity and in compliance with the law. This Code serves to:

- emphasize the Company's commitment to ethics and compliance with the law;
- set forth basic standards of ethical and legal behavior;
- provide reporting mechanisms for known or suspected ethical or legal violations; and
- help prevent and detect wrongdoing.

Because no code can anticipate every ethical question that may arise, this Code provides a broad view of how the Company expects Covered Parties to direct the work, business relationships, decisions, and actions they take on the Company's behalf. When confronted with an ethically ambiguous situation, a Covered Party should remember the Company's commitment to the highest ethical standards and seek advice before acting. A useful test in any situation is to ask whether you would be comfortable having the contemplated action fully and accurately described on the front page of a newspaper, read by your family, colleagues, regulators, and the Company's stockholders. Because the Company operates in a closely regulated industry in which its licenses are a condition of its existence, the Company holds its personnel to a standard of conduct that protects not only the Company's reputation but its ability to operate at all.

3.1 Violations of Ethical Standards

3.1.1 Reporting Known or Suspected Violations

Covered Parties should report known or suspected illegal or unethical behavior, including complaints or concerns regarding accounting, internal accounting controls, or auditing matters, to their supervisor or to the Company's Chief Executive Officer, who serves as the compliance officer under this Code (the "Compliance Officer"). If a concern involves the Compliance Officer, or if a Covered Party is not comfortable raising a concern with the Compliance Officer, the concern may be reported to any other member of the Board of Directors or to the Company's outside counsel, whose contact information will be made available to Covered Parties upon request. Reports may be made anonymously, and the identity of a person making a report will be protected to the maximum extent consistent with the Company's legal obligations. The Board of Directors, acting in its capacity as the Company's audit committee, will oversee the review of complaints regarding accounting, internal controls, and auditing matters. No retaliatory action of any kind will be permitted against anyone making a report in good faith, and any retaliation will itself be treated as a violation of this Code.

3.1.2 Accountability for Violations

If a determination is made that this Code has been violated, whether directly, by failure to report a violation, or by withholding information related to a violation, the offending Covered Party will be subject to disciplinary action, up to and including termination of employment or removal from office, and possible liability for non-compliance. Violations of this Code may also constitute violations of law and may result in criminal penalties and civil liabilities for the offending Covered Party and the Company. All Covered Parties are expected to cooperate in internal investigations of misconduct.

4.1 Ethical Standards

4.1.1 Conflicts of Interest

A conflict of interest exists when a Covered Party's private interest interferes in any way with the interests of the Company. A conflict can arise when a Covered Party takes actions or has interests that may make it difficult to perform his or her work for the Company objectively and effectively, or when a Covered Party or a member of his or her family receives improper personal benefits as a result of the Covered Party's position with the Company. Loans by the Company to, or guarantees by the Company of the obligations of, Covered Parties or their family members may create conflicts of interest, and loans to directors and executive officers are prohibited by law. It is almost always a conflict of interest for a Covered Party to work simultaneously for a competitor, customer, or supplier.

Conflicts of interest are not always clear-cut. A Covered Party with a question about a possible conflict should consult the Compliance Officer or, where the question concerns the Compliance Officer, another member of the Board of Directors. Each director and executive officer shall disclose to the full Board of Directors any material transaction or relationship that reasonably could be expected to give rise to a conflict of interest, and any transaction between the Company and a director, officer, or affiliate of the Company, including any entity controlled by a director or officer, must be approved in advance by the disinterested members of the Board of Directors or, where there are none, by the full Board with the interested party's interest fully disclosed and documented in the Board's records.

4.1.2 Corporate Opportunities

Covered Parties are prohibited from taking for themselves opportunities that are discovered through the use of corporate property, information, or position without the consent of the Board of Directors. No Covered Party may use corporate property, information, or position for improper personal gain, and no employee may compete with the Company directly or indirectly. Covered Parties owe a duty to the Company to advance its legitimate interests whenever possible.

4.1.3 Fair Dealing

Covered Parties shall behave honestly and ethically at all times and with all people, shall act in good faith and with due care, and shall engage only in fair and open competition, treating competitors, suppliers, customers, and colleagues ethically. Stealing proprietary information, possessing trade secret information obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. No Covered Party should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.

4.1.4 Gifts and Entertainment

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage. No gift or entertainment should ever be offered or accepted by a Covered Party or any family member of a Covered Party unless it (1) is consistent with customary business practices, (2) is not excessive in value, (3) cannot be construed as a bribe or payoff, and (4) does not violate any laws or regulations. The offer or acceptance of cash gifts by any Covered Party is prohibited. Covered Parties should discuss with the Compliance Officer any gift or proposed gift they think may be inappropriate.

4.1.5 Insider Trading

Covered Parties who have access to confidential information are not permitted to use or share that information for securities trading purposes or for any other purpose except the conduct of the Company's business. It is always illegal to trade in the Company's securities while in possession of material nonpublic information, and it is also illegal to communicate or "tip" such information to others. The Company has adopted an Insider Trading Policy applicable to its directors, officers, and employees, which is filed as an exhibit to the Company's Annual Report on Form 10-K; all Covered Parties are required to comply with that policy, including its blackout, pre-clearance, and prohibited-transaction provisions.

4.1.6 Confidentiality

Covered Parties must maintain the confidentiality of confidential information entrusted to them, except when disclosure is authorized by the Compliance Officer or required by law or regulation. Confidential information includes all nonpublic information that might be of use to competitors or harmful to the Company or its customers if disclosed, including nonpublic financial information, customer and pricing information, and information that customers, suppliers, and business partners have entrusted to the Company. The obligation to preserve confidential information continues after employment or service ends. Nothing in this Code prohibits a Covered Party from communicating with, or reporting possible violations of law to, any governmental agency, or from making other disclosures protected by applicable whistleblower laws.

4.1.7 Protection and Proper Use of Company Assets

Covered Parties should protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Company's profitability, and — because the Company's inventory consists of regulated cannabis products subject to seed-to-sale tracking — theft or diversion of inventory is both a crime and a threat to the Company's licenses, and must be reported immediately. The Company's equipment should not be used for non-Company business, though incidental personal use is permitted. The obligation to protect Company assets includes proprietary information such as trade secrets, trademarks, brand assets, recipes and formulations, production methods, business and marketing plans, customer databases, and unpublished financial data and reports; unauthorized use or distribution of such information violates this Code and may be illegal.

4.1.8 Compliance with Laws, Rules and Regulations; Regulated Operations

Obeying the law, both in letter and in spirit, is the foundation of the Company's ethical standards. Covered Parties shall comply with all laws, rules, and regulations applicable to the Company and its operations, including federal and state securities laws, tax laws, employment laws, anti-bribery laws, and anti-money laundering requirements applicable to the Company's banking and financial arrangements.

The Company operates a state-licensed regulated marijuana business in Colorado. Marijuana remains a controlled substance under the U.S. Controlled Substances Act, and the Company's cannabis operations are conducted in reliance on, and in strict conformity with, the Colorado regulatory framework. Accordingly, it is the Company's policy that its cannabis operations be conducted at all times in strict compliance with the Colorado Marijuana Code, the rules of the Colorado Marijuana Enforcement Division, and applicable local licensing requirements, including requirements governing licensing, badging, seed-to-sale inventory tracking, product testing, packaging and labeling, transport and distribution, marketing, and recordkeeping. Every Covered Party is responsible for the accuracy and completeness of the regulatory records he or she creates or maintains, including inventory tracking system entries, transport manifests, and testing documentation. Falsification of, or knowing failure to maintain, any regulatory record is a violation of this Code and grounds for immediate termination. Any inspection, inquiry, subpoena, or other contact from a regulatory or law enforcement agency should be reported immediately to the Compliance Officer.

4.1.9 Timely and Truthful Public Disclosure

In reports and documents filed with or submitted to the Securities and Exchange Commission and other regulators, and in other public communications made by the Company, the Covered Parties involved in the preparation of such reports and documents shall make disclosures that are full, fair, accurate, timely, and understandable. Where applicable, these Covered Parties shall provide thorough and accurate financial and accounting data for inclusion in such disclosures. They shall not knowingly conceal or falsify information, misrepresent material facts, or omit material facts necessary to avoid misleading the Company's independent registered public accounting firm or investors.

4.1.10 Significant Accounting Deficiencies

Any Covered Party shall promptly bring to the attention of the Compliance Officer and the Board of Directors, acting in its capacity as the Company's audit committee, any information he or she may have concerning (a) significant deficiencies in the design or operation of internal control over financial reporting which could adversely affect the Company's ability to record, process, summarize, and report financial data, or (b) any fraud, whether or not material, that involves management or other employees who have a significant role in the Company's financial reporting, disclosures, or internal control over financial reporting. Where the information concerns the Compliance Officer, the report should be made to another member of the Board of Directors or to the Company's independent registered public accounting firm.

4.1.11 Political and Charitable Contributions

The Company respects Covered Parties' right to engage in personal political and charitable giving. Such contributions and activities must be lawful and must not involve the use of Company time, funds, or resources. Charitable or political giving on behalf of the Company must be lawful, must be approved by the Compliance Officer, must align with the Company's values, and must not be given as a condition of, or in order to improperly influence, any business or regulatory decision.

5.1 Waivers

Any waiver of this Code for an executive officer or director may be made only by the Board of Directors and will be promptly disclosed as required by law, including by the filing of a Current Report on Form 8-K or by posting on the Company's website, in each case as permitted by applicable SEC rules. Any amendment to this Code applicable to the Company's principal executive officer, principal financial officer, or principal accounting officer will be disclosed in the same manner.

6.1 Compliance Procedures

The Company and Covered Parties must work to ensure prompt and consistent action against violations of this Code. Because it is not possible to anticipate every situation that may arise, Covered Parties should keep the following steps in mind when facing a difficult question:

- Before acting, make sure you have all the facts; informed decisions are better decisions.
- Ask yourself what, specifically, you are being asked to do, and whether it seems unethical or improper. Use judgment and common sense: if something seems unethical or improper, it probably is.
- Clarify your responsibility and role, and consider whether colleagues should be informed or involved.
- Discuss the problem with your supervisor or the Compliance Officer; in most situations this is the appropriate first step.
- If it would be inappropriate or uncomfortable to raise the issue with your supervisor or the Compliance Officer, raise it with another member of the Board of Directors or the Company's outside counsel.
- You may report ethical violations in confidence and without fear of retaliation; if your situation requires that your identity be kept secret, your anonymity will be protected to the maximum extent consistent with the Company's legal obligations.
- Ask first, act later: if you are unsure of what to do in any situation, seek guidance before you act.

ACKNOWLEDGMENT

I acknowledge that I have received and read the Code of Business Conduct and Ethics of Bespoke Extracts, Inc., that I understand it, and that I agree to comply with it. I understand that compliance with the Code is a condition of my continued service with the Company and that I should direct any questions regarding the Code to the Compliance Officer.

Signature: ______________________________ Date: __________________

Name / Title: ______________________________