

CODE OF CONDUCT POLICY

Summit Digital Solutions, Inc.

Effective Date: January 1, 2024

Policy Number: COC-2024-01

1. PURPOSE AND SCOPE

1. This Code of Conduct Policy ("Policy") establishes the fundamental principles, values, and expectations for professional conduct at Summit Digital Solutions, Inc. ("Company"). This Policy applies to all employees, contractors, officers, directors, and representatives of the Company.

2. As a leader in digital transformation services, we are committed to maintaining the highest standards of ethical conduct, professional integrity, and regulatory compliance while delivering innovative solutions to our clients.

2. CORE VALUES AND PRINCIPLES

1. Innovation with Integrity

- Pursue technological advancement while maintaining ethical standards
- Protect intellectual property and confidential information
- Make decisions based on sound business judgment and ethical considerations

2. Client Trust

- Maintain transparency in all client interactions
- Deliver services with professionalism and excellence
- Protect client data and confidential information

3. Professional Excellence

- Maintain technical expertise and professional certifications
- Deliver quality work products that meet or exceed industry standards
- Continuously improve skills and knowledge

3. WORKPLACE CONDUCT AND ETHICS

1. Professional Behavior

- Treat all colleagues, clients, and partners with respect and dignity
- Maintain a harassment-free workplace
- Foster an inclusive environment that values diversity
- Communicate professionally in all forms of correspondence

2. Confidentiality and Data Protection

- Safeguard company and client confidential information
- Comply with data protection regulations and security protocols
- Use approved systems and tools for data handling
- Report security incidents immediately

3. Conflicts of Interest

- Disclose potential conflicts of interest promptly
- Avoid situations that could compromise professional judgment
- Obtain approval before engaging in outside business activities
- Maintain appropriate boundaries with clients and vendors

4. COMPLIANCE AND REGULATORY OBLIGATIONS

1. Legal Compliance

- Comply with all applicable laws and regulations
- Maintain required licenses and certifications
- Report violations through appropriate channels
- Cooperate with internal and external audits

2. Information Security

- Follow all security protocols for the Peak Performance Platform
- Protect access credentials and authentication methods
- Maintain clean desk policy and secure workspace
- Complete required security training

3. Intellectual Property

- Protect company's proprietary technology and methodologies
- Respect third-party intellectual property rights

- Document and report innovations appropriately
- Maintain confidentiality of trade secrets

5. BUSINESS PRACTICES

1. Fair Competition

- Engage in fair and ethical business practices
- Avoid anti-competitive behavior
- Maintain accurate business records
- Follow procurement and contracting procedures

2. Client Relations

- Maintain professional boundaries with clients
- Document all client interactions appropriately
- Follow established pricing and billing practices
- Protect client intellectual property

3. Social Media and External Communications

- Follow company communication guidelines
- Protect confidential information on social platforms
- Obtain approval for public statements
- Maintain professional online presence

6. REPORTING AND ENFORCEMENT

1. Reporting Violations

- Report violations to immediate supervisor or HR
- Use anonymous reporting hotline when appropriate
- Cooperate with investigations
- Protection against retaliation for good faith reporting

2. Disciplinary Actions

- Violations may result in disciplinary action
- Consequences up to and including termination

- Legal action for serious violations
- Documentation of all disciplinary measures

7. ACKNOWLEDGMENT AND TRAINING

1. All covered individuals must:

- Review this Policy annually
- Complete required training modules
- Sign acknowledgment of understanding
- Seek clarification when needed

8. POLICY ADMINISTRATION

1. The Human Resources Department, in conjunction with the Legal Department, shall:

- Maintain and update this Policy
- Provide training and guidance
- Investigate reported violations
- Ensure consistent enforcement

9. AMENDMENTS AND UPDATES

This Policy may be amended or updated at any time by the Company. Material changes will be communicated to all covered individuals.

Approved by the Board of Directors

Summit Digital Solutions, Inc.

Date: December 15, 2023

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Dr. Alexandra Reeves

Chief Executive Officer

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Sarah Blackwell

Chief Operating Officer