

INSIDER TRADING POLICY

Summit Digital Solutions, Inc.

Effective Date: January 1, 2024

1. PURPOSE AND SCOPE

1. This Insider Trading Policy (the "Policy") establishes guidelines and procedures for trading in securities of Summit Digital Solutions, Inc. (the "Company") by directors, officers, employees, consultants, and other related parties who may have access to material, non-public information.
2. This Policy is designed to prevent insider trading violations, protect the Company's reputation, and ensure compliance with federal securities laws, including the Securities Exchange Act of 1934, as amended, and Rule 10b-5 promulgated thereunder.

2. DEFINITIONS

1. "Material Information" means information that a reasonable investor would consider important in making an investment decision regarding the Company's securities.
2. "Non-public Information" means information that has not been broadly disseminated to the public through major newswire services, national news services, or public filings with the SEC.
3. "Covered Persons" means all directors, officers, employees, consultants, contractors, and their immediate family members or household members.

3. PROHIBITED ACTIVITIES

1. No Covered Person may:
 - a) Trade in Company securities while in possession of material, non-public information;
 - b) Tip or disclose material, non-public information to others;
 - c) Assist anyone engaged in the above activities;
 - d) Trade during blackout periods as defined in Section 4;
 - e) Engage in short sales of Company securities;
 - f) Trade in derivative securities related to Company stock.

4. TRADING WINDOWS AND BLACKOUT PERIODS

1. Regular Trading Windows:

- Begin: Second trading day following public release of quarterly earnings
- End: 15 calendar days prior to the end of each fiscal quarter

2. Regular Blackout Periods:

- Begin: 15 calendar days prior to the end of each fiscal quarter
- End: Second trading day following public release of quarterly earnings

3. Special Blackout Periods may be implemented at any time at the discretion of the Chief Legal Officer, particularly during periods of significant corporate developments.

5. PRE-CLEARANCE PROCEDURES

1. All directors, officers (Section 16 reporting persons), and designated employees must obtain written pre-clearance before conducting any transaction in Company securities.
2. Pre-clearance requests must be submitted to the Chief Legal Officer at least two business days prior to the proposed transaction.
3. Pre-clearance authorization expires at the end of the third trading day after authorization is granted.

6. RULE 10b5-1 TRADING PLANS

1. Covered Persons may enter into Rule 10b5-1 trading plans when not in possession of material, non-public information.
2. All Rule 10b5-1 plans must be:
 - a) Approved in advance by the Chief Legal Officer
 - b) Entered into during an open trading window
 - c) Subject to a minimum 30-day waiting period before first trade

7. REPORTING AND COMPLIANCE

1. Section 16 reporting persons must file all required SEC Forms 3, 4, and 5 within the specified deadlines.
2. All Covered Persons must report violations or suspected violations of this Policy to the Chief

Legal Officer immediately.

3. The Company maintains the right to monitor trading activities and request certifications of compliance.

8. CONSEQUENCES OF VIOLATIONS

1. Violations of this Policy or applicable securities laws may result in:

- a) Immediate termination of employment
- b) Criminal penalties including fines and imprisonment
- c) Civil penalties and disgorgement of profits
- d) Legal action by the Company

9. ADMINISTRATION AND INTERPRETATION

1. The Chief Legal Officer is responsible for administering this Policy and has authority to interpret its provisions.

2. Questions regarding this Policy should be directed to:

Legal Department

Summit Digital Solutions, Inc.

Email: legal@summitdigital.com

10. AMENDMENTS AND MODIFICATIONS

1. The Company reserves the right to amend or modify this Policy at any time without prior notice.

2. Changes will be communicated to all Covered Persons and posted on the Company's internal compliance portal.

ACKNOWLEDGMENT

I acknowledge that I have read and understand the Summit Digital Solutions, Inc. Insider Trading Policy and agree to comply with its terms.

Name:

Title: _

Date: _

Signature: _

This Policy was adopted by the Board of Directors of Summit Digital Solutions, Inc. on December 15, 2023.