

CORPORATE CODE OF ETHICS AND BUSINESS CONDUCT

DeepShield Systems, Inc.

Effective Date: January 1, 2024

1. INTRODUCTION

1 This Corporate Code of Ethics and Business Conduct (the "Code") establishes the fundamental principles and standards of business conduct for DeepShield Systems, Inc. (the "Company") and applies to all directors, officers, employees, contractors, and representatives (collectively, "Personnel").

2 Given our role in protecting critical infrastructure and industrial control systems, maintaining the highest standards of ethical conduct is essential to our mission and reputation.

2. CORE VALUES AND PRINCIPLES

1 The Company's core values are:

- Integrity in all operations and interactions
- Excellence in cybersecurity solutions
- Innovation in industrial protection
- Responsibility to our clients and society
- Security-first mindset

2 Personnel shall conduct business in accordance with all applicable laws, regulations, and Company policies while maintaining the highest ethical standards.

3. CONFIDENTIALITY AND DATA PROTECTION

1 Personnel shall:

- (a) Maintain strict confidentiality of Company proprietary information, including our deep-layer security architecture and AI-driven threat detection systems
- (b) Protect client information and operational technology (OT) environments
- (c) Follow all data protection protocols and security measures
- (d) Report any potential data breaches or security incidents immediately

2 These obligations continue after employment termination.

4. CONFLICTS OF INTEREST

1 Personnel must avoid situations where personal interests conflict with Company interests.

2 Potential conflicts include:

- (a) Financial interests in competitor companies
- (b) Outside employment in industrial cybersecurity
- (c) Business relationships with family members
- (d) Board positions with competing entities

3 All potential conflicts must be disclosed to the Ethics Committee.

5. FAIR DEALING AND COMPETITION

1 Personnel shall:

- (a) Compete fairly and ethically in the marketplace
- (b) Not engage in anti-competitive practices
- (c) Respect intellectual property rights
- (d) Maintain transparent client relationships

2 Pricing and contract terms shall be based on legitimate business factors.

6. GOVERNMENT CONTRACTING AND CRITICAL INFRASTRUCTURE

1 When working with government entities or critical infrastructure:

- (a) Comply with all applicable regulations and security requirements
- (b) Maintain accurate documentation and certifications
- (c) Report any security vulnerabilities promptly
- (d) Follow proper procurement procedures

2 Special care must be taken when handling classified information or sensitive industrial systems.

7. ENVIRONMENTAL AND SAFETY COMPLIANCE

1 The Company commits to:

- (a) Environmental sustainability in operations

- (b) Safe workplace practices
- (c) Responsible disposal of electronic waste
- (d) Energy-efficient data centers

8. REPORTING AND COMPLIANCE

1 Personnel must report violations through:

- (a) Direct supervisor notification
- (b) Ethics hotline: ethics@deepshield.com
- (c) Chief Compliance Officer
- (d) Anonymous reporting system

2 The Company prohibits retaliation against those who report violations in good faith.

9. ENFORCEMENT AND DISCIPLINARY ACTION

1 Violations may result in:

- (a) Disciplinary action up to termination
- (b) Legal proceedings
- (c) Reporting to authorities
- (d) Financial penalties

10. AMENDMENTS AND ACKNOWLEDGMENT

1 The Board of Directors may amend this Code at any time.

2 Personnel must acknowledge receipt and compliance annually.

11. CERTIFICATION

I hereby certify that I have read, understand, and agree to comply with the Corporate Code of Ethics and Business Conduct.

Name: _

Title: _

Date: _

Signature: _

12. APPROVAL

ADOPTED by the Board of Directors of DeepShield Systems, Inc.

Dr. Marcus Chen

Chief Executive Officer

Robert Kessler

Chief Financial Officer

Date: January 1, 2024