

# **CODE OF BUSINESS CONDUCT AND ETHICS**

**Summit Digital Solutions, Inc.**

*Effective Date: January 1, 2024*

*Last Updated: January 1, 2024*

## **1. INTRODUCTION AND PURPOSE**

1. This Code of Business Conduct and Ethics (the "Code") establishes the fundamental principles and standards of conduct required of all directors, officers, employees, contractors, and representatives (collectively, "Personnel") of Summit Digital Solutions, Inc. (the "Company").

2. The Company's commitment to ethical business practices and regulatory compliance forms the foundation of our corporate culture and business success. This Code reflects our core values and commitment to maintaining the highest standards of business conduct.

## **2. SCOPE AND COMPLIANCE**

1. This Code applies to all Personnel conducting business on behalf of the Company, including its subsidiaries and affiliates worldwide.

2. Personnel must comply with all applicable laws, regulations, and Company policies in jurisdictions where the Company operates.

3. Violations of this Code may result in disciplinary action, up to and including termination of employment or business relationship.

## **3. ETHICAL BUSINESS PRACTICES**

### **1. \*\*Data Privacy and Security\*\***

- Protect confidential information and intellectual property
- Maintain robust cybersecurity practices
- Comply with data protection regulations
- Handle client data with utmost care and in accordance with contractual obligations

### **2. \*\*Fair Competition\*\***

- Compete fairly and ethically in all markets

- Avoid anti-competitive practices
- Respect confidential information of competitors
- Comply with antitrust laws and regulations

3. **\*\*Anti-Corruption and Bribery\*\***

- Prohibit all forms of bribery and corruption
- Maintain accurate books and records
- Conduct appropriate due diligence on business partners
- Report suspicious activities to the Compliance Officer

## **4. CONFLICTS OF INTEREST**

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

2. Potential conflicts must be disclosed to the Ethics Committee, including:

- Outside business interests
- Personal relationships with clients or competitors
- Financial investments in competitors
- Board memberships or advisory roles

## **5. PROTECTION OF COMPANY ASSETS**

1. **\*\*Intellectual Property\*\***

- Protect proprietary technology and innovations
- Safeguard the Peak Performance Platform and related IP
- Maintain confidentiality of trade secrets
- Respect third-party intellectual property rights

2. **\*\*Company Resources\*\***

- Use Company assets responsibly
- Protect physical and digital assets
- Maintain accurate records
- Report unauthorized use or theft

## **6. CLIENT RELATIONS AND SERVICE DELIVERY**

1. Personnel must:

- Deliver services with integrity and professionalism
- Maintain transparent communication
- Honor contractual commitments
- Protect client confidentiality

2. Quality Standards:

- Adhere to established quality control procedures
- Maintain required certifications
- Document service delivery accurately
- Report quality concerns promptly

## **7. REPORTING AND NON-RETALIATION**

1. Personnel must report suspected violations through:

- Direct supervisor
- Ethics hotline: [ethics@summitdigital.com](mailto:ethics@summitdigital.com)
- Compliance Officer
- Legal Department

2. The Company prohibits retaliation against individuals who:

- Report suspected violations in good faith
- Participate in investigations
- Raise ethical concerns
- Seek guidance regarding compliance matters

## **8. ADMINISTRATION AND ENFORCEMENT**

1. The Ethics Committee shall:

- Oversee Code implementation
- Review reported violations
- Recommend disciplinary actions
- Update the Code as needed

2. Annual certification required from all Personnel confirming:

- Review and understanding of the Code
- Compliance with its provisions
- Disclosure of known violations
- Completion of required training

## **9. AMENDMENTS AND WAIVERS**

1. This Code may be amended only by the Board of Directors.

2. Waivers for executive officers or directors require Board approval and prompt disclosure to shareholders.

## **10. ACKNOWLEDGMENT**

I acknowledge that I have received, read, and understand the Summit Digital Solutions Code of Business Conduct and Ethics. I agree to comply with its provisions.

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**Name:** \_

**Title:** \_

**Date:** \_

**Signature:** \_

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*This Code was adopted by the Board of Directors of Summit Digital Solutions, Inc. on January 1, 2024.*