

TRYFACTA, INC.

INSIDER TRADING POLICY

(Adopted and approved by Board of Directors on November 26, 2025, and effective as of the Company's listing date)

1. Purpose

This Policy provides guidelines to all directors, officers, employees, and consultants of Tryfacta, Inc. (collectively with its subsidiaries, the "Company") regarding trading in the Company's securities and the securities of other companies with which the Company has a business relationship. This Policy is designed to prevent insider trading or even the appearance of impropriety.

2. Scope

This Policy applies to all directors, officers, employees, and consultants of the Company. It also applies to their "immediate family members" and any entities they control (collectively, "Covered Persons").

3. Definition of "Material Nonpublic Information" (MNPI)

- **Material:** Information is "material" if a reasonable investor would likely consider it important in making a decision to buy, hold, or sell securities. Examples include:
 - Financial results or forecasts (e.g., earnings releases).
 - Major new contracts or contract losses.
 - Pending or proposed mergers, acquisitions, or divestitures.
 - Significant management changes.
 - Major cybersecurity incidents.
 - Significant litigation or government investigations.
- **Nonpublic:** Information is "nonpublic" if it has not been broadly disseminated to the public (e.g., via a press release or regulatory filing) and a reasonable amount of time has not passed for the market to absorb it.

4. The Policy

- **No Trading on MNPI:** No Covered Person who is aware of MNPI relating to the Company may, directly or indirectly:
 - Trade in Company securities (buy, sell, etc.).
 - Advise others to trade in Company securities.
 - Engage in any other action to take personal advantage of that information.
- **No Tipping:** No Covered Person who is aware of MNPI may disclose that information ("tip") to any other person (including family and friends) who might use it to trade.
- **Trading in Other Companies:** The "no trading on MNPI" rule also applies to information about other public companies (such as customers, partners, or acquisition targets) that a Covered Person learns in the course of their duties.

5. Blackout Periods and Pre-Clearance

- **Blackout Periods:** The Company will impose "blackout periods" on certain "Designated Persons" (typically directors, executive officers, and key finance/legal personnel). These periods will begin

before the end of each fiscal reporting period and end after the public release of financial results. No Designated Person may trade during a blackout period.

- **Event-Specific Blackouts:** The Company may impose special blackout periods at any time in response to material developments.
- **Pre-Clearance:** All Designated Persons must pre-clear all trades in Company securities with the Compliance Officer, even outside of a blackout period.

6. Consequences

Violations of this Policy can result in severe consequences, including immediate termination of employment, as well as severe civil and criminal penalties (fines and imprisonment) under the applicable securities laws.