

TRYFACTA, INC.

WHISTLEBLOWER POLICY

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

1. Purpose

Tryfacta, Inc. (collectively with its subsidiaries, the "Company") is committed to maintaining the highest standards of ethics and compliance. This Policy is intended to encourage and enable directors, officers, and employees to raise serious concerns ("Reportable Conduct") internally, in good faith, without fear of retaliation.

2. Scope

This Policy applies to all directors, officers, employees, and consultants of the Company.

3. Reportable Conduct

Reportable Conduct includes, but is not limited to:

- Violations of any U.S. or international law, rule, or regulation.
- Fraud or deliberate error in the Company's financial statements or accounting.
- Deficiencies in or non-compliance with the Company's internal accounting controls.
- Violations of the Company's Code of Business Conduct and Ethics.
- Any other conduct that could cause serious harm to the Company's reputation or financial well-being.

4. Confidential and Anonymous Reporting Channels

Any person with a good-faith concern about Reportable Conduct is encouraged to report it.

- **Direct Reporting:** Reports may be made to a supervisor, the Compliance Officer, the Chief Financial Officer, or the Board of Directors.
- **Audit Committee:** Reports related to accounting, internal controls, or auditing matters may be made directly to the Chair of the Audit Committee.
- **Anonymous Hotline:** The Company will maintain a confidential and anonymous reporting mechanism (e.g., a third-party telephone hotline and/or web-based portal), which will be communicated to all employees. This channel will be available 24/7.

5. No Retaliation

The Company strictly prohibits any form of retaliation, harassment, or adverse employment action against any individual who, in good faith:

- Reports what they reasonably believe to be Reportable Conduct; or
- Cooperates in an investigation of such conduct.

Any person who believes they have been retaliated against must report it immediately to the Compliance Officer or the Audit Committee.

6. Investigation

The Audit Committee has the authority and responsibility to investigate all credible reports regarding

accounting, internal controls, or auditing matters. The General Counsel or another designated officer may investigate all other matters. All reports will be investigated promptly and discreetly. The Company will take appropriate corrective action as warranted by the investigation.