GOWELL ENERGY TECHNOLOGY

INSIDER TRADING POLICY

Adopted by the Board of Directors on September 24, 2026

I. PURPOSE OF THIS POLICY

In the course of performing your duties for GOWell Energy Technology (together with its subsidiaries, the "**Company**"), you may from time to time receive or become aware of material nonpublic information ("**MNPI**") about the Company or other companies that do business with the Company. This Insider Trading Policy (the "**Policy**") furnishes guidelines concerning information that may be "material" and "nonpublic" and your legal obligations and obligations to the Company relating to the use or disclosure of MNPI regarding the Company or such other companies.

The Company has adopted this Policy to promote compliance with applicable securities laws, known as "insider trading" laws, which prohibit persons who receive or become aware of MNPI about the Company (or other companies that do business with the Company) from trading in the Company's (or such other company's) securities or providing MNPI to others who may trade in the Company's (or such other company's) securities on the basis of that information.

Insider trading laws can impose legal liability not only on individuals who fail to comply with these laws, but also to the Company as the employer of individuals who violate these laws. Accordingly, the Company has adopted this Policy not only to guide the individuals associated with the Company who are covered by the Policy, but also to protect the Company from legal liability and promote its business interest in maintaining an impeccable reputation for integrity. This Policy is subject to modification from time to time as the Board of Directors ("**Board**") deems necessary or advisable.

II. EFFECTIVENESS OF THIS POLICY

This Policy is effective as of the date set forth at the top of this page and supersedes any previous insider trading policy of the Company. In the event of any conflict or inconsistency between this Policy and any other materials previously distributed by the Company, this Policy shall govern. In addition, each Covered Person (as defined below) is responsible for complying with applicable law as then in force and effect. Accordingly, in the event of any conflict or inconsistency between this Policy and applicable law, or any omission from this Policy, Covered Persons are not excused from complying with applicable law.

III. COMPLIANCE OFFICER FOR THIS POLICY

The Company's General Counsel shall serve as the compliance officer (the "**Compliance Officer**") for this Policy. The Compliance Officer, or the Board, may designate additional officers of the Company to serve as Compliance Officer for this Policy from time to time. Any questions concerning this Policy should be directed to, and all interpretations of this Policy shall be made by, a duly designated Compliance Officer.

IV. TO WHOM THIS POLICY APPLIES

This Policy is applicable to all current and former directors, officers and employees of the Company, whether located in or outside of the United States, as well as family members and other members of their respective households, any family members who do not live in your household but whose transactions in the Company's securities are directed by you or are subject to your influence or control, partnerships in which any such person is a general partner, trusts of which any such person is a trustee, estates of which any such person is an administrator or executor and other legal entities that any such person controls (the "**Covered Persons**"). The Compliance Officer may also determine from time to time that other persons who may have access to MNPI due to their activities with the Company shall be subject to this Policy. Any persons so identified by the Compliance Officer shall also be "Covered Persons" for purposes of this Policy.

V. POLICY

If a Covered Person is in possession of MNPI relating to the Company, that person may not, directly or indirectly, buy, sell or engage in other transactions in securities of the Company. Securities of the Company is broadly construed to include equity, debt and convertible securities of the Company, and derivatives (whether or not issued by the Company) linked to or exercisable for securities of the Company (the "**Company Securities**"), except as set forth in Section VIII below, or engage, directly or indirectly, in any other action to disclose to others ("tipping") or benefit from or take advantage of that information (for example, recommending transactions in Company Securities).

This Policy also applies to MNPI relating to any other company with publicly-traded securities, including the Company's customers, suppliers or other business relations, obtained in the course of the Covered Person's employment by, service to or other relationship with the Company.

Additional restrictions on buying, selling or engaging in other transactions in Company Securities apply to directors, executive officers and other officers (as set forth below) of the Company, as described in Section IX.

VI. DEFINITIONS AND EXPLANATIONS

(a) *When Information is "Material".*

In order to determine whether information is material, it must be evaluated in the context of all facts and circumstances at play at the time. Information is considered "material" if:

- a reasonable investor would consider the information important in making a decision to buy, sell or hold Company Securities;
- release of the information could produce a qualitative change to the package of information disclosed to the public by the Company; or

- public disclosure of the information would be likely to have a significant effect on the market price of Company Securities.

Material information can be positive or negative and can relate to virtually any aspect of the Company's business. Information that is or may be material includes (but is not limited to) the following, depending upon all facts and circumstances at the time of assessment:

- unpublished financial or operating results, positive or negative;
- projections or changes in projections of financial or operating results, upwards or downwards;
- a pending or proposed corporate transaction involving the Company, such as merger, acquisition or divestiture;
- a pending or proposed public offering or private placement of securities of the Company or other financing for the Company outside of the ordinary course of business;
- a pending or proposed repurchase or redemption of Company Securities;
- the gain or loss of a significant customer or supplier;
- changes in senior management;
- execution of a business contract that is important to the Company financially, strategically or otherwise;
- significant regulatory approvals or challenges;
- pending or threatened litigation of potential significance to the Company, or settlement or other resolution of ongoing litigation;
- a change in the Company's independent registered public accounting firm;
- the need to restate financial statements;
- impending bankruptcy or liquidity problems;
- cybersecurity incidents, vulnerabilities and breaches; and
- other material events or developments that the Company is required to disclose in a Form 6-K to be filed with the U.S. Securities and Exchange Commission ("**SEC**").

(b) ***When Information is "Nonpublic".***

Information is "nonpublic" if it has not been disclosed to the public. In order for information to be considered public, it must be widely disseminated; for example, through:

- newswire releases;
- widely available broadcasts on television and radio;

- publication in widely available newspapers or news websites; or
- disclosure in the Company's periodic reports filed with the SEC.

Publication on the Company's website can also contribute to wide dissemination of information (and may itself constitute wide dissemination depending upon the extent to which the Company has established its website as a vehicle for timely release of important Company information in accordance with SEC guidance). The fact that rumors, speculation, or statements attributed to unidentified sources are public is insufficient to be considered widely disseminated even when the information is accurate.

After a wide dissemination of material information, a reasonable period of time must elapse for the investing public to process the information. As a rule of thumb, two full Trading Days following wide dissemination is regarded as a reasonable waiting period before such information is deemed to be "public" and no longer "nonpublic" for purposes of this Policy. For purposes of this Policy, a "**Trading Day**" shall mean any day on which Nasdaq Stock Market is open for trading. The Compliance Officer may determine that a different waiting period is appropriate with respect to particular Company disclosures based upon prevailing facts and circumstances. For the avoidance of doubt, Covered Persons should consult the Compliance Officer when contemplating transactions in Company Securities shortly after public disclosures by the Company.

(c) ***Be Mindful of How a Transaction May be Viewed in Hindsight.***

If a particular transaction (or group of transactions) is challenged by enforcement authorities, it will be viewed with the benefit of hindsight. As a result, before engaging in any transaction, a Covered Person should give careful thought to whether any facts and circumstances exist that could raise suspicions about the propriety of the proposed transaction after the fact; for example, as to whether information that the Covered Person has become aware of may be construed as "material" and "nonpublic." Again, in the event of any doubt, Covered Persons should consult the Compliance Officer when contemplating transactions in Company Securities.

VII. GUIDELINES

(a) ***Non-disclosure of Material Nonpublic Information (MNPI).***

MNPI must not be disclosed to anyone unless it has first been widely disseminated to the public as described above, except to other Company personnel who have a need to know the information and are bound by a confidentiality obligation to the Company and covered by this Policy, or third party agents of the Company (such as accountants, investment bankers or outside legal counsel) whose positions require them to have access to such information, but who are bound by a professional obligation to protect its confidentiality.

(b) ***Prohibited Trading in Company Securities*.**

No person may place a purchase or sell order or recommend that another person place a purchase or sell order in Company Securities when they are aware of MNPI concerning the Company that has not been disclosed to the public. As noted above, for purposes of the prohibition expressed in this Policy, "Company Securities" should be construed broadly, and the terms "purchase" or "sell" should also be interpreted broadly to include transactions involving Company Securities such as elections or changes in elections under Company Securities purchase plans, loans, pledges, gifts, charitable donations and other contributions of Company Securities.

(c) ***"Tipping" Information to Others*****.**

Covered Persons may be liable for communicating or tipping MNPI to any third party ("tippee"). Further, insider trading violations are not limited to trading or tipping by Covered Persons. Persons other than Covered Persons also can be liable for insider trading, including tippees who trade on MNPI tipped to them and individuals who trade on MNPI which has been misappropriated.

Tippees inherit a Covered Person's duties under this Policy and applicable insider trading laws and may be held liable for trading on MNPI illegally tipped to them by a Covered Person. Similarly, just as Covered Persons are liable for the insider trading of their tippees, so are tippees who communicate the information to others who trade. In other words, a tippee's liability for insider trading is no different from that of a Covered Person. Tippees can obtain MNPI in deliberate ways, such as the direct receipt of a tip, or in less deliberate or obvious ways, such as conversing at social, business or other gatherings. In addition, insider trading liability can arise if a Covered Person misappropriates information for purposes of securities trading in breach of a duty of confidentiality—for example, a fiduciary obligation to a party that provides confidential information after entering into a non-disclosure agreement with the Company.

(d) ***Prohibitions Involving Securities of Other Companies*****.**

As described in paragraphs Error: Reference source not found, (b) and (c) above, no Covered Person may disclose MNPI, engage in prohibited trading or "tip" information to others to the extent the Covered Person becomes aware of MNPI about another company in the course of business activities on behalf of the Company. Another company may include, without limitation, any of the Company's customers, vendors, an acquisition target, or a company in the same industry, sector or subsector.

(e) ***No Hedging of Company Securities*****.**

The Company believes that purchases of hedging instruments that protect against downward changes in Company's share price can result in the purchaser no longer having the same objectives as the Company's other shareholders because they are no longer subject to the full risks of share ownership. Accordingly, no employee of the Company or member of the Board may engage in any hedging transaction that would result in lack of exposure to the full risks of share ownership. Prohibited hedging

transactions include, but are not limited to, collars, forward sale contracts, trading in publicly-traded options, puts, calls or other derivative instruments related to Company shares or debt.

(f) ***No Margin Accounts, Pledging or Short Sales of Company Securities*****.**

Securities purchased on margin may be sold by the broker without the customer's consent if the customer fails to meet a margin call. Similarly, securities held in an account which may be borrowed against or are otherwise pledged (or hypothecated) as collateral for a loan may be sold in foreclosure if the borrower defaults on the loan. Accordingly, if you purchase securities on margin or pledge them as collateral for a loan, a margin sale or foreclosure sale may occur at a time when you are aware of MNPI or otherwise are not permitted to trade in our securities. The sale, even though not initiated at your request, is still a sale for your benefit and may subject you to liability under the insider trading rules if made at a time when you are aware of MNPI. Similar cautions apply to a bank or other loans for which you have pledged stock as collateral. Short sales of the Company's securities (i.e., selling stock that is not owned and borrowing the shares to make delivery) may evidence an expectation on the part of the seller that the securities will decline in value, and therefore have the potential to signal to the market that the seller lacks confidence in the Company's prospects. In addition, short sales may put the personal gain of the seller in conflict with the best interests of the Company and its security-holders or otherwise give the appearance of impropriety.

Accordingly, no employee of the Company or member of the Board may hold Company Securities in a margin account, pledge Company Securities as collateral for a loan or "short" sell Company Securities. The Board may, in its sole discretion and in limited circumstances after consulting with legal counsels, grant an exception to this prohibition; *provided that* that the pledge will not violate any laws and regulations applicable to the Company, the pledgor, and the pledgee.

VIII. EXCEPTIONS

(a) ***No Sale/No Purchase Transactions*****.**

The prohibitions of this Policy do not apply to bona fide gifts of Company Securities (i.e., for no consideration), except that any such transaction should be pre-cleared by the Compliance Officer as provided in Section (c). In addition, this Policy does not restrict purchases and sales of mutual funds, similar professionally managed "commingled pools" or exchange-traded funds that invest in Company Securities in addition to securities of other companies.

(b) ***Transactions under Company Equity Plans*****.**

The prohibitions of this Policy do not apply to a Covered Person's exercise of a stock option granted under a Company equity plan for cash, but do apply to any sale of Company Securities received upon exercise of an option in the open market, regardless

of whether the sale is to pay the exercise price or for tax withholding. Similarly, this Policy does not apply to a Covered Person's surrender of Company Securities to the Company or the retention and withholding from delivery to the Covered Person of shares by the Company (i.e., a so-called "net settlement") upon vesting of restricted stock in satisfaction of tax withholding obligations in a manner permitted by the applicable equity award agreement or the Company equity plan pursuant to which the restricted stock was granted.

(c) ***Changes Only in the Form of Beneficial Ownership*.**

Transferring shares to an entity that does not involve a change in the beneficial ownership of the shares (for example, transferring shares from one brokerage account to another brokerage account that you control, or to an inter vivos trust of which you are the sole beneficiary during your lifetime).

(d) ***10b5-1 Plan Transactions*.**

The execution of transactions pursuant to a trading plan that complies with SEC Rule 10b5-1 and which has been approved by the Company pursuant to Section IX(e).

(e) ***Other Transactions*.**

This Policy does not apply to any other transaction, the specific facts of which are reviewed by the Compliance Officer and determined by the Compliance Officer not to constitute a violation of applicable insider trading law.

IX. ADDITIONAL PROVISIONS APPLICABLE TO SPECIAL INSIDERS

(a) ***Special Insiders*.**

This Section IX sets forth additional provisions applicable to the following individuals associated with the Company (referring to the publicly-traded entity, not its subsidiaries) ("**Special Insiders**"):

- each member of the Board;
- each "executive officer" of the Company, as described in Rule 3b-7 under the Securities Exchange Act of 1934, as amended (the "**Exchange Act**");
- each "officer" of the Company, as defined in Section 16 of the Exchange Act;
- each individual designated in Exhibit A to this Policy who have regular access to MNPI in the normal course of their job; and
- each other individual designated as a Special Insider by the Compliance Officer from time to time.

(b) ***Blackout Periods/Trading Windows*.**

Special Insiders are prohibited from trading in Company Securities during the following blackout periods: (a) the Company's regularly scheduled quarterly blackout period (x) commencing at 4:00 p.m. Eastern Time on the tenth business day prior to each of June 30 and December 31, and the ending of any quarter for which the Company issues "earnings releases", and (y) ending two full Trading Days after the Company's "earnings release" is issued to the public relating to the Company's financial information for the concluded period, and (b) special blackout periods instituted by the Compliance Officer on a discretionary basis, upon notice to Special Insiders. Subject to pre-clearance as provided in Section 1.(c) below, Special Insiders are generally permitted to trade when no blackout period is in effect; provided, however, that even during an open trading window, a Special Insider who is aware of MNPI may not trade in Company Securities until the information has been made publicly available as described above, or is no longer material.

(c) ***Pre-Clearance*****.**

Special Insiders (including family members and other members of their respective households) must submit a request for prior clearance to the Compliance Officer at least two business days prior to the desired date of buying, selling, or engaging in any transaction in Company Securities (except as described in Section 1.(e) below), including any exercise of stock options, and must obtain such clearance from the Compliance Officer prior to the transaction. The Compliance Officer will evaluate each proposed transaction to determine if it raises insider trading concerns or other concerns under the federal or state securities laws and regulations. Any advice will relate solely to legal considerations and not the merits of the investment decision. Clearance of a transaction will be valid only for a 48-hour period. If the Special Insider becomes aware of MNPI before the trade is executed, the prior clearance is void and the trade must not be completed. If the transaction order is not placed within that 48-hour period, clearance of the transaction must be re-requested from the Compliance Officer. If the Special Insider seeks prior clearance and permission to engage in the transaction is denied, then the Special Insider should refrain from initiating any transaction in Company Securities and should not inform any other person of the restriction.

(d) ***Short-Swing Trading*****.**

Special Insiders who purchase Company Securities may not sell, and Special Insiders who sell Company Securities may not purchase, any Company Securities of the same class, within the six-month period before or after such transaction, in each case only where the purchase and sale (or sale and purchase) would be matchable against one another for purposes of the short-swing profit recovery provisions of Section 16(b) of the Exchange Act. Notwithstanding the foregoing, the prohibition does not apply to any opposite-way transaction that would not be matchable under Section 16(b) (including any transaction that is exempt under the rules adopted under Section 16) of the Exchange Act.

(e) ***Rule 10b5-1 Plans*****.**

A Special Insider's trades may be exempt from this Policy if made under a properly pre-established and maintained written trading plan, known as a "Rule 10b5-1 plan." If the Rule 10b5-1 plan meets all of the requirements under the Exchange Act for such a plan, and the purchases or sales of Company Securities are actually made in accordance with the terms and conditions of the plan, the trades will not be deemed to have been made "on the basis of" MNPI, even if the Special Insider who established the plan is actually aware of MNPI at the time of execution of the transactions provided for by the plan.

A properly designed Rule 10b5-1 plan must meet the following requirements:

- the plan was established when the Special Insider was unaware of MNPI concerning the Company;
- the plan specifies the number (or dollar value) of Company Securities to be purchased or sold, the price (which may be a fixed price, market price or minimum/maximum price) at which the shares are to be traded, and the date of the trade, or provides a written formula or algorithm for determining the timing, amount, and price of the trade (or the plan can give a third party such as a designated broker the exclusive right to determine the timing, amount, and price of the trade);
- the plan does not permit the Special Insider to exercise any subsequent influence over how, when, or whether to effect purchases or sales; provided, however, that if a third party (such as a broker) is designated under the terms of the plan to determine the timing, amount, and price of trades, the third party must not have been aware of the MNPI about the Company or Company Securities when it makes its trading decisions;
- the plan must be entered into in good faith and not as part of a scheme to evade insider trading prohibitions and include a representation in the plan certifying at the time of adoption or modification that the Special Insider is (1) not aware of any MNPI and (2) adopting the plan is in good faith and not as part of a scheme to evade Rule 10b5-1;
- the guidelines regarding the plan include a "cooling off" period between the time that the Special Insider enters a plan and the time that trading commences under the plan; and
- the plan requires the broker of the Company's directors and officers (as defined in Rule 16a-1 under the Exchange Act) to notify the Company before the close of business on the day after the execution of a transaction according to the plan.

Any new Rule 10b5-1 plan, or amendment or termination of an existing Rule 10b5-1 plan, must be reviewed and approved by the Compliance Officer; *provided, however*, that trades occurring under an approved Rule 10b5-1 plan do not require pre-clearance.

GOWELL ENERGY TECHNOLOGY

INSIDER TRADING POLICY

CERTIFICATION

I have received a copy of and read the Insider Trading Policy of GOWell Energy Technology and its subsidiaries (the "**Company**"). I understand and agree to comply with the policies and procedures set forth in the Insider Trading Policy.

I understand and agree that my failure to comply with the Insider Trading Policy in all respects may constitute a basis for the termination for cause of my employment by or other service relationship with the Company, or other appropriate disciplinary action.

Signature: _____

Name: _____

Date: _____

Exhibit A

David MacNeill – VP of Corporate Development

Mongi Abdelmoula – VP for Capital Projects

Qinshan Yang – VP Research & Development

Christopher Morgan – VP Commercial Excellence and Marketing

Marvin Rourke – VP Technology

Rahul Mahajan – VP for Capital Projects/Industrial Solutions

Lewis Dai – Vice President Finance

Joanne Yeo – Director of Business Transformation

Kuai Jie – Finance Reporting Manager