



STEWARDS, INC.

CODE OF BUSINESS CONDUCT AND ETHICS

INTRODUCTION

Stewards, Inc. ("Stewards" or the "Company") values honesty, integrity, and adherence to the highest ethical standards. Each of us has a responsibility to uphold these values and maintain a commitment to the basic principles of business ethics and good judgment.

This Code of Business Conduct and Ethics (the "Code") serves as a guide for fulfilling our legal and ethical responsibilities. The Code is designed to deter wrongdoing and to promote:

- honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
- full, fair, accurate, timely, and understandable disclosure in reports and documents filed with the SEC and in our other public communications;
- compliance with applicable laws, rules, and regulations;
- prompt internal reporting of violations of this Code; and
- accountability for adherence to this Code.

This Code applies to all directors, officers, employees, and contractors of Stewards, Inc., its subsidiaries, and any subsidiaries formed in the future.

Because the principles described in this Code are general, the Code does not cover every situation that may arise. Use common sense and good judgment. If you have questions, contact the Chief Financial Officer ("CFO").

Violations of law, this Code, or any other Company policies may result in disciplinary action up to and including termination.

BASIC PRINCIPLES

Employment Practices

Equal Opportunity and Diversity

Stewards is committed to equal employment opportunity and compliance with all applicable employment laws. Diversity is critical to our success, and we seek to hire and retain the most talented individuals from diverse backgrounds.

Harassment

Stewards prohibits discrimination, harassment, and intimidation of any kind. Harassment based on gender, race, age, disability, sexual orientation, religion, or any other protected class will not be tolerated. False claims of harassment are also prohibited.

Safe and Healthy Workplace

Employees must report all safety concerns and accidents. Violence or threats of violence will not be tolerated. The use, sale, or possession of illegal drugs or being under the influence of alcohol while working is strictly prohibited.

Compliance with Government and Industry Regulation

Employees must comply with all applicable federal, state, and local laws. Violations may result in civil or criminal penalties for both the individual and the Company.

Insider Trading

Employees must comply with federal securities laws and Company policies regarding the use of material non-public information.

Material non-public information includes unannounced financial results, proposed transactions, management changes, or other impactful business developments.

Employees must not:

- trade Stewards securities (or securities of any other public company) while in possession of inside information,
- “tip” others who may trade based on such information.

Violations may result in civil and criminal penalties.

See the Company’s **Insider Trading and Tipping Policy** for full guidance.

Prohibition on Short-Term or Speculative Transactions

Directors, officers, employees, and 10% stockholders may not engage in short sales, publicly traded options, hedging transactions, or holding Company securities in margin accounts.

Exceptions may be granted **only** by the Board of Directors under very limited circumstances.

Other employees must obtain written approval from the CEO and CFO before engaging in any speculative transaction involving Company securities.

Free and Fair Competition

Stewards complies with all antitrust and competition laws. Employees must never:

- discuss prices, markets, or customers with competitors,
- enter agreements that restrict fair competition,
- make misleading claims about competitors.

Consult the CFO before engaging in any collaboration or joint venture that involves competitors.

Environmental Compliance

Stewards operates responsibly and complies with all applicable environmental laws. Employees are encouraged to support environmentally sustainable practices.

Business Records

Accuracy

Employees must ensure all business and financial records are accurate, complete, and truthful. False or misleading entries are prohibited.

All expenses, transactions, and disclosures must be timely and accurately recorded.

Maintaining and Managing Records

Stewards must retain records in accordance with applicable laws, including email, digital files, paper documents, and other media.

When a legal hold is issued, employees must not alter or destroy records until the CFO releases the hold.

Confidential or Copyrighted Information

Stewards Confidential Information

Confidential information includes proprietary data, financial information, customer lists, strategy, and technology.

Employees may not disclose Company confidential information without authorization.

Confidential Information of Others

Employees must respect the confidential information of competitors, partners, and other third parties. Only accept such information when covered by an approved nondisclosure agreement.

Copyrighted Information

Employees must comply with copyright laws. Unauthorized copying of software, publications, or digital media is prohibited.

Protection and Proper Use of Company Assets

Computers and Electronic Devices

Company equipment must be used responsibly and primarily for Company business. The Company may access, monitor, or review any information stored on or transmitted through Company systems, as permitted by law.

Unauthorized software copying or installation is prohibited.

Company Funds and Employees

Company funds must be used only for legitimate business purposes. Expense reports must be accurate and submitted promptly.

Corporate Opportunities

Employees, officers, and directors must not use Company property, information, or position for personal gain. Opportunities belonging to the Company must be offered to the Board first.

Conflicts of Interest

Employees must avoid situations where personal interests conflict—or appear to conflict—with Company interests.

Conflicts include:

- working for or holding a significant financial interest in a competitor or major customer,
- lending money to or borrowing from Company business partners,
- using Company information for personal gain,
- participating in transactions involving immediate family members.

Directors and executive officers must disclose potential conflicts to the CFO and independent directors. Other employees must disclose conflicts to the CFO in writing.

Payments or Gifts from Others

Employees may not accept gifts or payments intended to improperly influence business decisions.

Modest gifts, meals, or entertainment may be accepted only when they do not create an appearance of impropriety.

Charitable Contributions and Political Activities

Employees may participate personally in charitable or political activities, but:

- must not use Company resources for personal political activity,
- must not pressure coworkers to support causes,
- must clearly state personal views are not Company views.

Foreign Corrupt Practices Act (FCPA)

Stewards complies fully with the FCPA. Bribes, improper payments, or anything of value offered to foreign officials are prohibited.

All contracts involving government-affiliated entities must receive CFO approval.

Company Spokespersons

Only the CEO and CFO are authorized to speak to the press or investors. Employees must direct all inquiries to them.

Employees giving public statements must receive written approval and may need to include disclaimers.

REPORTING PROCEDURES

Employees must promptly report ethical concerns or Code violations to:

- Chief Strategy Officer
- Chief Financial Officer

Reports are confidential, and retaliation against good-faith reporters is prohibited.

Stewards may use independent third-party hotline services to support anonymous reporting.

DISCIPLINARY ACTIONS

Violations of this Code or other policies may result in:

- disciplinary action,
 - termination of employment or contractor relationship,
 - civil or criminal prosecution.
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WAIVERS AND AMENDMENTS

Any waiver of this Code for a director or executive officer must be approved in writing by the Board of Directors and disclosed as required by law.

Waivers for all other employees must be approved by the CFO.

ACKNOWLEDGEMENT OF RECEIPT

I hereby acknowledge that I have received a copy of the **Stewards, Inc. Code of Business Conduct and Ethics** and agree to comply with its terms. I understand that violations may result in severe civil and/or criminal penalties and disciplinary action, including termination.

Signed: _____

Name (Print): _____

Date: _____