

XEED ACQUISITIONS GROUP, INC.

Code of Ethics for Financial Professionals

(Adopted April, 2025)

Purpose and Applicability

This **Code of Ethics for Financial Professionals** (the “**Code**”) applies to the following officers and employees of **Xeed Acquisitions Group, Inc.** and its subsidiaries (collectively, the “**Company**”):

- The Chief Executive Officer (“**CEO**”),
- The Chief Financial Officer (“**CFO**”),
- The Chief Accounting Officer (“**CAO**”), and
- Any other employee serving in a finance, accounting, corporate treasury, internal audit, or tax role (collectively, the “**Financial Professionals**”).

The purpose of this Code is to:

1. Promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
2. Ensure full, fair, accurate, timely, and understandable disclosure in reports filed with, or submitted to, the **U.S. Securities and Exchange Commission** (“**SEC**”) and other regulators; and
3. Foster compliance with applicable governmental laws, rules, and regulations at the federal, state, local, and international levels.

This Code supplements, but does not replace, the Company’s **Code of Business Conduct and Ethics** and any applicable compliance manuals.

Standards of Conduct

Ethical Conduct and Conflicts of Interest

Each Financial Professional is expected to:

1. Engage in and promote the highest standard of integrity, honesty, and ethical conduct.
2. Handle actual or apparent conflicts of interest between personal and professional relationships ethically and transparently.
3. Promptly disclose to the Company's **Chief Legal Officer ("CLO")** any material transaction or relationship that reasonably could be expected to give rise to a conflict.

For the avoidance of doubt, the following shall **not** be considered a material transaction or relationship for purposes of this Code:

- The investment by any **"Related Person"** (as defined in Item 404(a) of Regulation S-K) in, or alongside, any investment fund or investment vehicle managed by the Company or its subsidiaries, regardless of whether fees or other incentive arrangements are borne by such person; and
- Participation by any Related Person in any **carry plan** or similar profit-sharing arrangement sponsored by the Company or its subsidiaries.

Performance of Duties

1. Carry out responsibilities honestly, in good faith, and with integrity, due care, and diligence.
2. Exercise independent judgement at all times.

Public Disclosure and SEC Filings

1. Assist in producing full, fair, accurate, timely, and understandable disclosure in all reports and documents filed with, or submitted to, the SEC, and in all other public communications by the Company.
2. Ensure that disclosures comply with the requirements of the **Exchange Act, Securities Act of 1933**, and applicable SEC rules and forms.

Compliance with Laws and Regulations

1. Comply with all applicable governmental laws, rules, and regulations.
2. Understand and adhere to applicable standards of the SEC, the **Public Company Accounting Oversight Board ("PCAOB")**, and any other relevant regulatory body.

Integrity of the Audit Process

1. Never take any action, directly or indirectly, to coerce, manipulate, mislead, or fraudulently influence the Company's independent auditors in the performance of an audit or review of the Company's financial statements (see Exchange Act Rule 13b2-2).

Reporting Obligations

1. Promptly report to the **Audit Committee of the Board of Directors** any suspected violation of this Code or other conduct that could compromise the integrity of the Company's financial statements.
2. Reports may be made confidentially or anonymously by mailing:

Audit Committee
Xeed Acquisitions Group, Inc.
Attn: Audit Committee
535 Fifth Avenue
New York, NY 10017

And to

FP@xeedgrp.co

Accountability and Enforcement

A. Responsibility for Compliance

- Each Financial Professional is personally accountable for adherence to this Code.
- Managers are responsible for ensuring that employees under their supervision understand and comply with the Code.

B. Enforcement Measures

- The Company will take prompt and appropriate action in response to violations of this Code, up to and including termination of employment.
- Violations may also result in civil and/or criminal liability for both the individual and the Company.

Questions and Guidance

If you have any questions about how this Code should be applied in a particular situation, contact the **Chief Legal Officer** immediately.

No Waiver Without Board Approval

Any waiver of this Code for the CEO, CFO, CAO, or other senior financial officer may be made only by the Board of Directors or a duly authorized committee thereof and will be promptly disclosed as required by SEC rules and applicable stock exchange listing standards.

Adopted by the Board of Directors on April 22, 2025.

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