XEED ACQUISITIONS GROUP, INC.

Compliance Governance Statement and Select Policies

Governance Overview

Xeed Acquisitions Group, Inc. (the "Company") maintains a comprehensive, proactive, and transparent compliance framework designed to meet or exceed the requirements of the **U.S. Securities and Exchange Commission ("SEC")**, the **New York Stock Exchange ("NYSE")**, and all applicable global regulatory bodies. The Company's compliance programs support ethical business conduct, protect corporate reputation, and mitigate legal, operational, and reputational risks.

Oversight of these programs rests with the **Audit Committee of the Board of Directors**, working in close coordination with the **Legal & Compliance Department ("L&C")**, the **Chief Compliance Officer**, and other executive leadership. The Company's compliance framework is structured around three interdependent pillars:

1. **Anti-Bribery and Anti-Corruption** – Strict prohibition on improper payments in compliance with the **U.S. Foreign Corrupt Practices Act (FCPA)**, the **UK Bribery Act**, and other equivalent global legislation.

2. **Whistleblower and Reporting Protections** – Confidential, secure, and retaliation-free mechanisms for reporting misconduct, administered by an independent third-party provider and overseen by the Audit Committee.

3. **Anti-Money Laundering and Counter-Terrorism Financing** – Programs to prevent and detect money laundering, terrorist financing, and related financial crimes in accordance with the **Bank Secrecy Act (BSA)**, the **USA PATRIOT Act**, and applicable international regulations.

The Company treats compliance not as a procedural obligation but as a strategic asset essential to long-term growth, public market credibility, and shareholder trust.

Global Anti-Bribery and Anti-Corruption Compliance Policy

The Global Anti-Bribery & Anti-Corruption Compliance Policy (the "ABC Policy") applies to all Company directors, officers, employees, agents, advisors, consultants, partners, representatives, and any other associated persons globally. The ABC Policy prohibits:

- Paying, receiving, offering, or promising to pay any bribe or anything of value to any third party, including facilitation payments, in any jurisdiction.

- Authorizing, assisting, or encouraging any other person to engage in such conduct.

All Company personnel must comply with the FCPA, the UK Bribery Act, and all applicable anti-corruption laws in the jurisdictions where they operate.

Key Program Features:

- Annual mandatory training on the ABC Policy.

- Periodic compliance testing through internal audits.

- Immediate rejection and reporting of any improper payment request or other suspected violation to the **Chief Legal Officer**.

- Escalation procedures for any known or suspected violation through internal reporting channels.

Enforcement:

Violations may result in disciplinary action, including termination, and may be reported to appropriate regulatory or law enforcement authorities.

Whistleblower Policy and Employee Reporting Hotline

The Company's Whistleblower Policy provides all personnel with multiple secure and confidential reporting channels, including:

- A **24-hour EthicsPoint reporting hotline**, administered by an independent third-party provider.

- An online reporting system accessible from any country where the Company operates.

- Written correspondence to the **Audit Committee** at the Company's headquarters.

Reports may be submitted anonymously where permitted by local law. All reports are reviewed promptly by L&C, with findings escalated to the Audit Committee as necessary.

The Company strictly prohibits retaliation against any individual who reports a concern in good faith or participates in an investigation.

Anti-Money Laundering (AML) Compliance Program

The Company has implemented an Anti-Money Laundering Compliance Program ("AML Program") that is reasonably designed to prevent and detect money laundering, terrorist financing, and other illicit financial activities.

The AML Program Includes:

- Written policies and procedures consistent with the **Bank Secrecy Act**, the **USA PATRIOT Act**, and applicable global regulations.
- Designation of a **Chief Compliance Officer** with responsibility for administering, monitoring, and overseeing the program.
- Ongoing AML training for appropriate personnel.
- Independent audits of the AML Program to ensure effectiveness and regulatory compliance.

The Company is committed to participating in global efforts to combat money laundering and terrorist financing and to meeting all regulatory obligations in every jurisdiction in which it operates.

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