BRADBURY CAPITAL INC.
CORPORATE GOVERNANCE GUIDELINES

Adopted: October 6, 2026

Purpose

The Board of Directors (the "***Board***") of Bradbury Capital Inc. (the "***Company***") has adopted the following guidelines to assist the Board in the exercise of its responsibilities and to serve the best interests of the Company and its shareholders. These guidelines should be interpreted in the context of all applicable laws and the Company's memorandum and articles of association (as amended from time to time) (the "***Charter***") and other corporate governance documents. These guidelines are intended to serve as a flexible framework within which the Board may conduct its business and not as a set of legally binding obligations. The following guidelines are subject to modification, and the Board may, in the exercise of its discretion, deviate from these guidelines from time to time as the Board may deem appropriate or as required by applicable laws and regulations.

Role of the Board and Management

The Company's business is conducted by its directors, officers and employees, under the direction of its Chief Executive Officer and under the oversight of the Board, to enhance the long-term value of the Company for its shareholders. The Board is elected by the Company's shareholders to oversee management and to ensure that the long-term interests of the shareholders are being served.

Director Qualifications

A majority of the Board's members will be "independent," as such term is defined by the rules of Nasdaq (the "***Exchange***").

Directors should possess the highest personal and professional ethics, integrity and values. Directors must also have an inquisitive and objective perspective, practical wisdom and mature judgment. Directors must develop an understanding of the Company's business and have a willingness to devote adequate time to carrying out their duties. The Board seeks directors who represent a mix of backgrounds and experiences that will enhance the quality of the Board's deliberations and decisions. The Nominating and Corporate Governance Committee of the Board shall monitor the mix of skills, experience and background to assure that the Board has the necessary composition to effectively perform its oversight Function.

Lead Director

Whenever the Executive Chairman of the Board is an executive officer of the Company, the independent directors, within the meaning of the then-effective rules of the Exchange, shall elect one such independent director as a "Lead Director" to lead the Board in fulfilling its duties effectively, efficiently and independent of management. The Lead Director's responsibilities will include, but not be limited to, (a) presiding over all meetings of the Board at which the Executive Chairman is not present, including any

executive sessions of the independent directors, (b) approving Board meeting schedules and agendas, and (c) acting as the liaison between the independent directors and the Executive Chairman and Chief Executive Officer. At such times as the Executive Chairman is an independent director, the Executive Chairman will serve as Lead Director. The Board may modify its leadership structure in the future as it deems appropriate.

Director Selection

The Nominating and Corporate Governance Committee will solicit and receive recommendations for candidates to fill any Board vacancies and will review the qualifications of potential director candidates. The Nominating and Corporate Governance Committee will present any recommended candidates to the full Board for consideration. The Nominating and Corporate Governance Committee may engage the services of third-party search firms to assist in identifying or evaluating director candidates.

Term Limits and Retirement Policy; Change in Status; Resignation of Management Directors upon Separation of Employment

The Board does not believe that arbitrary term limits on directors' service or a mandatory retirement age are the best way to maximize the effectiveness of the Board in carrying out its oversight function. As an alternative, the Board will periodically review the appropriateness of each Board member's continued service.

Any director whose principal occupation changes substantially from the position that he or she held when becoming a member of the Board will promptly notify the Chairperson of the Nominating and Corporate Governance Committee of this change.

The Board expects that when a member of Company management who serves on the Board resigns from his or her executive position, he or she will simultaneously submit his or her resignation from the Board. Whether the individual continues to serve on the Board is a matter for discussion at that time by the Nominating and Corporate Governance Committee, which will submit its recommendations regarding the person's continued service to the full Board for consideration.

Size of the Board

The number of directors that constitutes the Board shall be fixed from time to time by a resolution adopted by the Board in conformity with the requirements stated in the Company's Charter. The Nominating and Corporate Governance Committee shall periodically review the size and composition of the Board to ensure that the current number of members most effectively supports the Company.

Director Responsibilities and Board Functions

The Board is elected to oversee management and ensure that the long-term interests of the shareholders are served. The Board is the ultimate decision-making authority within the Company, except with respect to those matters which are reserved to the Company's shareholders.

The Board shall meet as frequently as needed for directors to discharge their responsibilities properly. The independent directors will meet in executive session without non-independent directors or management present on a regularly scheduled basis, but, in any event, no less than twice per year. In addition to regularly scheduled meetings, unscheduled Board meetings may be called upon appropriate notice at any time to address specific needs of the Company. The Board may also take action from time to time by written consent. Each director is expected to make reasonable efforts to attend substantially all meetings of the Board and committees on which the director serves. In addition, directors are invited and encouraged to attend the Company's annual meeting of shareholders.

The Company's executive officers, in consultation with the Company's legal counsel, will establish the agenda for each Board meeting. Each director is free to suggest the inclusion of item(s) on the agenda. Each director is free to raise at any Board meeting subjects that are not on the agenda for that meeting.

Information that is relevant to the Board's consideration of matters to be discussed at a meeting will, whenever possible, be distributed to directors sufficiently in advance of the meeting date to permit directors to prepare for a discussion of such matters.

Board Committees

The Board shall at all times have the following standing committees: an Audit Committee, a Compensation Committee, and a Nominating and Corporate Governance Committee. Each of the members of the Audit Committee, the Compensation Committee, and the Nominating and Corporate Governance Committee will be "independent" directors, within the meaning of the rules of the Exchange and applicable law and will otherwise satisfy all applicable requirements with respect to membership on such committees.

The Audit Committee, the Compensation Committee, and the Nominating and Corporate Governance Committee will each have written charters. The Board will review these charters on an annual basis and approve any changes recommended by the committees. These charters, along with these Corporate Governance Guidelines, will be posted on the Company's website at https://bradburycapital.gcs-web.com.

The Audit Committee, the Compensation Committee, and the Nominating and Corporate Governance Committee will each meet at least as frequently as is required by the terms of such Committee's charter, as applicable. Each Committee Chairman will periodically report to the Board on such Committee's activities.

The Board may establish additional committees as it deems appropriate from time to time.

Director Access to Management

The Board, and any individual director or group of directors, will have full access to all Company

employees at all times, including the Company's management. The Board encourages the Chief Executive Officer to invite non-director members of management to address the Board in those instances where an officer's expertise can enhance the Board's understanding of an issue under its consideration.

Retention of Independent Advisors

The Board and each of its committees will have the authority to retain, at the Company's expense, independent financial, legal, accounting and other advisors whenever they may deem necessary or appropriate.

Director Compensation

Independent directors shall receive reasonable compensation for their services to be determined from time to time by the Board, upon the recommendation of the Compensation Committee. Directors who are also members of management will receive no additional compensation for their service as directors. The Compensation Committee shall periodically review and report to the Board with respect to director compensation and benefits.

Management Succession

The Board, with input from the Nominating and Corporate Governance Committee, will maintain a succession plan for the Chief Executive Officer in the event of an emergency or the retirement of the Chief Executive Officer.

Annual Performance Evaluation of the Board

The Board and each of its committees will perform an annual self-evaluation to determine whether they are functioning effectively. As part of this self-evaluation, each Board member shall also evaluate the performance of each of the other directors. Board evaluations will be confidential and administered by the Chairperson of the Nominating and Corporate Governance Committee, who shall report to the Board each year concerning the results of all Board evaluations. The Chairperson of the Nominating and Corporate Governance Committee may, at the Company's expense, enlist the assistance of outside advisors in connection with the Board evaluation process should he or she deem it appropriate.

Conflicts of Interest

Directors will disclose any potential conflicts of interest to the Board prior to voting on a matter in which they have a conflict.

Related Party Transactions

All transactions between the Company or its affiliates and any other related parties are to be reviewed and approved by the Nominating and Corporate Governance Committee of the Company. Directors and executive officers of the Company shall notify the Company's counsel as soon as they become

aware of any actual or potential related party transaction. The Company's counsel shall conduct a preliminary analysis and review of potential related party transactions and shall present such transactions to the Nominating and Corporate Governance Committee for consideration.

Communication with the Board

The Company provides the opportunity for its shareholders to communicate with members of the Board. Shareholders may communicate with the independent Board members or the chairperson of any of the Committees of the Board by e-mail or regular mail. All communications by e-mail should be sent to the Company's counsel. Communications sent by regular mail should be sent to the attention of the Company's counsel, in care of the Company at the Company's office which is located at: Unit 16-04, Level 16, Imazium, No. 8, Jalan SS21/37, Damansara Uptown, 47400 Petaling Jaya, Selangor, Malaysia.

The Company's counsel will review each communication received in accordance with this process to determine whether the communication requires immediate action and will forward all appropriate communications received, or a summary of such communications, to the appropriate Board member(s). However, any communication that is unduly hostile, threatening, illegal, does not reasonable relate to the Company or its business, or is otherwise inappropriate will be disregarded. In furtherance, and not in lieu, of the immediately preceding sentence, the Company's counsel has the authority to disregard or to take other appropriate action with respect to any inappropriate communications.

Whistleblower Policy

The Company's "Whistleblower" policy (the "***Whistleblower Policy***") prohibits the Company and its subsidiaries and affiliates and their officers, employees and agents from discharging, demoting, suspending, threatening, harassing or in any other manner discriminating against any employee for raising a concern. If a shareholder or employee nonetheless prefers to raise their concern in a confidential or anonymous manner, the concern may be directed to the Whistleblower Officer at the Company's headquarters address or communicated via the Company's secure web portal or toll-free telephonic reporting system via Notified (each method is described further in the Whistleblower Policy).

Regulation FD Policy

The Company has established a Regulation FD policy to address the full, fair, accurate, timely and understandable disclosure of information about the Company on a non-selective basis and in compliance with Regulation FD, as promulgated by the U.S. Securities and Exchange Commission, and other applicable laws and regulations.

Clawback Policy

The Company has established an executive compensation clawback policy to provide the Company with rights of recoupment of incentive compensation from executive officers in the event of an accounting restatement or a violation of applicable laws or Company policies.

Conduct and Ethics Standards for Directors

Directors are subject to applicable provisions of the Company's Code of Ethics and Business Conduct, Insider Trading Policy, and Whistleblower Policy.

Commitment to Diversity and Inclusion

The Board is committed to creating and maintaining a culture of diversity and inclusion. The Company will be better able to grow and improve with a diverse Board, management, and team of employees. Such commitment is and will be a factor in identifying and nominating director candidates at both the Nominating and Corporate Governance Committee and Board levels.

Additionally, the Board believes in and supports equal opportunity in employment to all persons and strongly encourages management to embrace the unique contributions an employee or candidate can bring to the Company and its culture in terms of their education, opinions, culture, ethnicity, race, sex, gender identity and expression, sexual orientation, nationality, color, religion, veteran's status, disability and other life experiences. Further, the Board strongly encourages management to recruit and present a diverse candidate pool for the hiring manager's consideration when attempting to fill open positions throughout the Company. The Company does not tolerate sexual or other unlawful harassment or discrimination by any employee, volunteer, vendor, contractor, consultant, customer or visitor.

Amendment

The Nominating and Corporate Governance Committee will review and reassess the adequacy of these guidelines on an annual basis and recommend any proposed changes to the Board for approval. These guidelines may be amended by the Board from time to time.