QUANTUM SPACE, INC.
CODE OF ETHICS

Effective as of November 23, 2026

Introduction

The Board of Directors (the "Board") of Quantum Space, Inc. has adopted this code of ethics (the "Code"), which is applicable to all directors, officers and employees, including the principal executive officer, principal financial officer, principal accounting officer or controller, and persons performing similar functions, to:

- promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- promote the full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (the "SEC"), as well as in other public communications made by or on behalf of the Company;
- promote compliance with applicable governmental laws, rules and regulations;
- deter wrongdoing; and
- require prompt internal reporting of breaches of, and accountability for adherence to, this Code.

This Code may be amended only by resolution of the Board. In this Code, references to the "Company" mean Quantum Space, Inc. and, in appropriate context, its subsidiaries, and references to "each person" or "you" mean each director, officer and employee of the Company. This Code is intended to constitute a "code of ethics" within the meaning of Item 406 of Regulation S-K and a "code of business conduct and ethics" within the meaning of Section 303A.10 of the New York Stock Exchange ("NYSE") Listed Company Manual. This Code cannot address every situation that may arise; each person is expected to exercise good judgment and to seek guidance when in doubt.

Honest, Ethical and Fair Conduct

Each person owes a duty to the Company to act with integrity. Integrity requires, among other things, being honest, fair and candid. Deceit, dishonesty and subordinating one's principles are inconsistent with integrity. Service to the Company never should be subordinated to personal gain and advantage.
Each person must:

- act with integrity, including being honest and candid while still maintaining the confidentiality of the Company's information where required or in the Company's interests;
- observe all applicable governmental laws, rules and regulations;
- comply with the requirements of applicable accounting and auditing standards, as well as Company policies, in order to maintain a high standard of accuracy and completeness in the Company's financial records and other business-related information and data;
- adhere to a high standard of business ethics and not seek a competitive advantage through unlawful or unethical business practices;
- deal fairly with the Company's customers, suppliers, competitors and employees;
- refrain from taking advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice;
- protect the assets of the Company and ensure their proper use;
- refrain from taking for themselves personally opportunities that are discovered through the use of corporate assets, information or position, or from using corporate assets, information or position

for general personal gain outside the scope of employment with the Company, and refrain from competing with the Company, in each case except to the extent expressly permitted by the Company's certificate of incorporation; and

- avoid "related person transactions" or conflicts of interest, wherever possible, except in accordance with the Company's Related Person Transactions Policy and under guidelines or resolutions approved by the Board (or the appropriate committee of the Board, including the audit committee of the Board (the "Audit Committee")). For purposes of this Code, "related person transactions" have the meaning set forth in the Company's Related Person Transactions Policy. Conflicts of interest must be reported and addressed under this Code even if a transaction does not meet the monetary threshold or other criteria in that policy. A conflict of interest situation can arise when a person takes actions or has interests that may make it difficult to perform his or her work objectively and effectively. Conflicts of interest may also arise if a person, or a member of his or her family, receives improper personal benefits as a result of his or her position. Anything that would be a conflict for a person subject to this Code also will be a conflict if it is related to a member of his or her family or a close relative.

Conflicts of interest involving an employee who is not an officer should be reported in writing to the employee's supervisor or the Company's Chief Legal Officer or such other officer as the Board designates as the Company's compliance officer (the "Compliance Officer"). Conflicts of interest involving a director or executive officer must be reported to the Company's Compliance Officer, who will promptly refer the matter to the Audit Committee (or, where the Audit Committee is unable to act, another independent body of the Board). Any director or officer with an interest in a proposed transaction or arrangement must disclose the interest, may not vote on or seek to influence the matter, and may be excused from the portion of any meeting at which it is discussed, other than to answer questions from the disinterested members.

Confidentiality and Protection of Company Assets

Each person must maintain the confidentiality of non-public information entrusted to them by the Company or its customers, partners and suppliers, except when disclosure is authorized or legally required. Confidential information includes proprietary technical data, business plans, financial information not yet publicly disclosed, and materials and discussions of the Board and its committees. This obligation continues after a person's service or employment with the Company ends. Each person must protect the Company's assets, including its intellectual property, facilities and information systems, and ensure their efficient and proper use for legitimate business purposes.

Disclosure

The Company strives to ensure that the contents of and the disclosures in the reports and documents that the Company files with the SEC and other public communications shall be full, fair, accurate, timely and understandable in accordance with applicable disclosure standards, including standards of materiality, where appropriate. Each person must:

- not knowingly misrepresent, or cause others to misrepresent, facts about the Company to others, whether within or outside the Company, including to the Company's independent auditors, governmental regulators, self-regulating organizations and other governmental officials, as appropriate; and
- in relation to his or her area of responsibility, properly review and critically analyze proposed disclosure for accuracy and completeness. No person may knowingly omit material facts necessary to avoid misleading investors or the Company's independent auditors, or coerce, manipulate, mislead or fraudulently influence the independent auditors in performing an audit or review of the Company's financial statements.

In addition to the foregoing, the Chairperson of the Board, the Chief Executive Officer and the Chief Financial Officer of the Company and each subsidiary of the Company (or persons performing similar functions), and each other person that typically is involved in the financial reporting of the Company must familiarize himself or herself with the disclosure requirements applicable to the Company as well as the business and financial operations of the Company.

Each person must promptly bring to the attention of the chair of the Audit Committee or the Compliance Officer any information he or she may have concerning (a) significant deficiencies in the design or operation of internal and/or disclosure controls which could adversely affect the Company's ability to record, process, summarize and report financial data or (b) any fraud, whether or not material, that involves management or other employees who have a significant role in the Company's financial reporting, disclosures or internal controls.

Compliance with Laws

It is the Company's obligation and policy to comply with all applicable governmental laws, rules and regulations. It is the personal responsibility of each person to adhere to the standards and restrictions imposed by those laws, rules and regulations, including those relating to accounting and auditing matters.

Reporting and Accountability

The Audit Committee of the Company is responsible for applying this Code to specific situations in which questions are presented to it and has the authority to interpret this Code in any particular situation. Any person who becomes aware of any existing or potential breach of this Code is required to notify the Compliance Officer or the chair of the Audit Committee promptly. Reports concerning accounting, internal accounting controls, auditing matters, or the conduct of a director or executive officer should be directed to the chair of the Audit Committee. Reports may be made confidentially and anonymously, including through the Company's Open Door Policy for Reporting Violations and Complaints. Failure to report is itself a breach of this Code. Managers who receive a report of a possible violation must promptly escalate it to the Compliance Officer. To the extent possible, and consistent with applicable law and the Company's need to investigate, reports will be kept confidential.
Specifically, each person must:

- notify the Compliance Officer or the chair of the Audit Committee promptly of any existing or potential violation of this Code; and
- not retaliate against any other person for reports of potential violations that are made in good faith.

The Company will follow these procedures in investigating and enforcing this Code and in reporting on the Code:

- The Audit Committee (or, for matters that do not involve a director, an executive officer, accounting or auditing matters, or the Company's financial reporting, the Compliance Officer) will take all appropriate action to investigate any breaches reported to it.
- If the Audit Committee determines (by majority decision) that a breach has occurred, it will inform the Board of Directors.
- Upon being notified that a breach has occurred, the Board of Directors (by majority decision) will take or authorize such disciplinary or preventive action as it deems appropriate, after consultation with the Audit Committee, up to and including dismissal or, in the event of criminal or other serious violations of law, notification of the SEC or other appropriate law enforcement authorities.

No person following the above procedure shall, as a result of following such procedure, be subject by the Company or any officer or employee thereof to discharge, demotion, suspension, threat, harassment or, in any manner, discrimination against such person in terms and conditions of employment.
Nothing in this Code prohibits or restricts any person from reporting possible violations of law to, or communicating or cooperating with, any governmental or regulatory authority (including the SEC), or from participating in any whistleblower program of such an authority, in each case without notice to or approval from the Company. These protections include providing information, assisting in an investigation or proceeding, and seeking or receiving a whistleblower award. The Company prohibits retaliation for exercising these rights and will not enforce any policy or agreement that restricts them.

Waivers and Amendments

Any waiver of a provision of this Code for a director or executive officer may be made only by the Board or a committee of the Board and must be promptly disclosed as required by applicable SEC and NYSE rules. Any waiver (as defined below) or an implicit waiver (as defined below) from a provision of this Code for the principal executive officer, principal financial officer, principal accounting officer or controller, and persons performing similar functions or any amendment (as defined below) to this Code is required to be disclosed. The Company intends to make such disclosure on its website at www.quantumspaceinc.com, within the time required by Item 5.05 of Form 8-K, rather than by filing a Current Report on Form 8-K, and will state that intention in its annual report on Form 10-K as required. Waivers for employees other than directors, executive officers, the principal financial officer, the principal accounting officer or controller, and persons performing similar functions may be granted by the Compliance Officer, in consultation with the Chief Executive Officer or the Chief Financial Officer, and shall be reported to the Audit Committee.

A "waiver" means the approval by the Board or a committee of the Board of a material departure from a provision of the Code. An "implicit waiver" means the Company's failure to take action within a reasonable period of time regarding a material departure from a provision of the Code that has been made known to an executive officer of the Company. An "amendment" means any amendment to this Code other than minor technical, administrative or other non-substantive amendments hereto.

All persons should note that it is not the Company's intention to grant or to permit waivers from the requirements of this Code. The Company expects full compliance with this Code.

Other Policies and Procedures

Any other policies or procedures set out by the Company in writing or made generally known to employees, officers or directors of the Company prior to the date hereof or hereafter are separate requirements and remain in full force and effect.

Inquiries and Availability

All inquiries and questions in relation to this Code or its applicability to particular people or situations should be addressed to the Company's Compliance Officer or Secretary. Each director, officer and employee will be provided a copy of this Code, and may be asked to acknowledge periodically that he or she has read and will comply with it. This Code is available on the Company's website at www.quantumspaceinc.com, and the Company will provide a copy to any stockholder upon request.