TIMEPLAY HOLDINGS INC.

CODE OF BUSINESS CONDUCT AND ETHICS

1. Purpose and application

Timeplay Holdings Inc. (the "Company", or "Timeplay") brings people together through interactive entertainment and shared social experiences. Trust is essential to our relationships with players, customers, venues, business partners, colleagues and shareholders. We act lawfully, fairly, respectfully and with integrity. This Code is intended to promote honest and ethical conduct, full, fair, accurate, timely and understandable public disclosure, compliance with applicable law, protection of Company assets and corporate opportunities, fair dealing and accountability, and to deter wrongdoing.

This Code applies to directors, officers and employees and, where relevant to their work, contractors and consultants of Timeplay Holdings Inc. and each entity controlled by it from time to time, including, as of the effective date of this Code, Streamsix Inc., Streamsix Corp., TimePlay Corp. and Geeks Who Drink LLC (collectively, the "Group"). Third parties are expected to meet appropriate contractual standards. Local laws and more protective employee rights prevail where applicable.

2. Respectful, inclusive and safe workplace

Treat colleagues, customers, players and partners with dignity and respect. Discrimination, harassment, bullying, threats and retaliation are prohibited.

Follow applicable workplace safety, accessibility and employment policies; report unsafe conditions promptly. Managers must address concerns fairly and without reprisals. Work-related social events and venues do not reduce these standards.

3. Honesty, quality and accurate records

Create complete, accurate and timely business records. Never falsify revenue, expenses, contracts, game results, invoices, participant metrics, audit evidence or financial reporting.

Timeplay's products operate across partner venues and include licensed game-show experiences, trivia, bingo and other audience engagement products. Follow approved product, licensing, prize, contest, advertising, age-eligibility and consumer-protection requirements applicable to each offering and jurisdiction. Never misrepresent chances of winning or encourage misleading promotional claims.

Cooperate honestly with internal reviewers, external auditors and regulators; preserve records when a legal or regulatory hold applies.

4. Securities laws and confidential information

Protect material undisclosed information concerning Timeplay, its customers, partners and suppliers, including unreleased financial results, budgets, forecasts, revenue plans and partner contract negotiations. Do not trade in Timeplay securities or tip others while in possession of material undisclosed information. Follow the Company's Insider Trading and Blackout Policy and all related blackout and pre-clearance procedures.

Only authorized spokespersons may communicate financial performance, forecasts, transactions or material corporate developments to investors, analysts or the media. Refer inquiries to the CEO, CFO or investors@timeplay.com.

Respect contractual confidentiality and intellectual property, including third-party game-show brands, content, software and customer data. Confidentiality obligations continue after employment, engagement or service

ends, subject to lawful reporting to regulators, law enforcement and other protected disclosures.

5. Privacy, cybersecurity and responsible technology

Collect, access, use, retain and share personal data only for authorized business purposes and in accordance with applicable privacy law, Company policies and contractual commitments. Apply least-privilege access, secure storage and approved systems.

Protect employee HR data, player information, client and venue data, credentials and confidential technology. Promptly report suspected breaches, unauthorized access, lost devices and data loss through the security and privacy incident-reporting channel designated by the Company from time to time.

Do not input confidential, personal, licensed or proprietary material into unapproved AI or external services. Follow Company approvals for AI tools, software and data transfers.

6. Conflicts of interest, gifts and anti-corruption

Disclose actual, potential or perceived conflicts, including outside business interests, family relationships, investments or transactions that could affect impartial decision-making. Conflicts should be avoided unless properly disclosed and authorized. Directors and executive officers must refer potential conflicts to the Board or an unconflicted committee designated by the Board and must follow applicable corporate-law disclosure and recusal requirements. Other personnel must seek guidance and approval through the process designated by the Company.

Never offer, solicit, accept or authorize bribes, kickbacks or improper advantages. Gifts, hospitality, travel, entertainment and sponsorships must be modest, lawful, transparently recorded and consistent with Company approval

limits. Extra caution applies to public officials and government-connected entities.

Use Company property, funds, systems, intellectual property and services only for legitimate authorized purposes; avoid personal benefit without approval. Do not take for yourself, for family members or for another business any opportunity discovered through Company property, information or position, and do not compete with the Group, except with prior approval from the Board or an unconflicted committee designated by the Board.

7. Fair dealing and legal compliance

Deal honestly with customers, players, suppliers, competitors and regulators. Do not engage in deceptive advertising, improper pricing, collusion, bid-rigging or unfair practices.

Comply with applicable laws and Company requirements relating to employment, human rights, intellectual property, anti-bribery (including the Corruption of Foreign Public Officials Act (Canada) and the U.S. Foreign Corrupt Practices Act), sanctions, anti-money laundering (including for lottery, instant-win, bingo and iGaming products), consumer protection, contests and prizes, and privacy. Seek guidance where legal requirements differ across Canada and the United States.

8. Raising concerns and protection against retaliation

Raise concerns with your manager, People & Culture (p&c@timeplay.com), or directly with the Audit Committee Chair at auditcommitteechair@timeplay.com. No management reporting step is required before contacting the Chair. If a recipient is implicated, use an unconflicted alternative under the Whistleblower and Reporting Concerns Policy.

Reports are treated confidentially to the extent reasonably possible, but email is not anonymous. To report anonymously, use the anonymous reporting feature in Leapsome in accordance with the access instructions described in the Whistleblower and Reporting Concerns Policy.

Retaliation against anyone raising an honest concern, requesting guidance, assisting an investigation or reporting to regulators is prohibited. Nothing in this Code limits lawful direct contact with securities regulators or law enforcement, or any lawful whistleblower award.

9. Training, responsibility and enforcement

Complete assigned compliance training and acknowledgements by Company deadlines. The Group may set administrative timelines for onboarding and refresher training, communicated through People & Culture.

Managers must model ethical conduct, escalate material issues and avoid conflicts when responding to concerns. Breaches may lead to proportionate corrective action, up to and including termination or contract remedies, subject to applicable law. Honest mistaken reports are not misconduct.

The Board oversees compliance with this Code; management administers training and routine compliance, while the Audit Committee oversees accounting, internal-control and auditing complaints. The Board or an unconflicted committee designated by the Board will determine potential conflicts and alleged violations involving directors or executive officers. Management will address matters involving other personnel and escalate material matters to the Board or appropriate committee. The Board may approve amendments to this Code and any waiver granted to a director or executive officer. Any material amendment or waiver that is required to be disclosed will be disclosed in accordance with applicable securities laws.

10. Review and acknowledgement

The Board will review this Code at least annually and approve any material amendments. Directors and officers will re-acknowledge it annually. The Code will be distributed internally and made publicly available as determined by the Company, subject to applicable securities laws. The Company will file a copy of this Code and any amendment to it on SEDAR+ when required by applicable securities laws. The Company will also make any disclosure concerning the adoption or amendment of this Code, or any waiver granted to a director or executive officer, that is required under NI 58-101 or other applicable securities laws.

Adopted and approved by the Board of Directors on November 12, 2026.