Insider Trading Policy

Company "insiders" are subject to individual responsibilities and restrictions in addition to the responsibilities and obligations of the company itself. An "insider" of a company is a person who is a director, officer, employee, advisor, or consultant in possession of nonpublic material information regarding a company, as well as a shareholder owning 10% or more of the company's stock. If you have been provided with a copy of the Policy on Insider Trading ("Policy") of VirTra, Inc. ("Company"), you are subject to the rules contained herein. Accordingly, as insiders of the Company, you are subject to restrictions imposed by federal securities laws with respect to purchases and sales of the Company's shares.

THE BASICS

No person may trade in a company's securities if the person has material information, which has not yet been publicly disclosed.

Person: Directors, officers, advisors, consultants and employees at all levels within the Company (and, in addition, persons outside the Company that receive tips from insiders).

Trade: Transactions involving the purchase or sale of company stock, exercise of company options and warrants, puts, calls and other company securities.

Material Info: Information that a reasonable investor would consider important, as part of the total mix of available information, in reaching his or her investment decision.

So long as you are a Company insider, the rules contained herein apply to:

- You,
- Your family members who reside with you, and
- Any family members who do not live in your household but whose transactions in Company securities are directed by you or are subject to your influence or control (such as parents or children who consult with you before they trade in company securities).

You are responsible for the transactions of these other persons; therefore, you should make them aware of these procedures and their need to confer with you before they engage in any transaction subject to these procedures. As used in this Policy, "you" means anyone subject to the policies and procedures described herein.

The consequences of illegal insider trading are severe and can result in civil and criminal liability. In addition, a person can be held responsible for the trading violations of others if inside information is passed on, resulting in insider trading by others. In other words, tippers can be subject to the same penalties and sanctions as the tippees, and the federal Securities and Exchange Commission ("SEC") has imposed large penalties even when the tipper did not profit from the transaction. Penalties can include:

- Civil penalties up to the greater of $2,301,065 or three times the profit gained or loss avoided (including, in certain circumstances, from persons who "control" the primary violator, which would apply to the Company and/or management and supervisory personnel);

- A maximum of 20 years imprisonment; and/or

- Fines of up to $5 million.

INSIDER TRADING EXPLAINED

No Trading or Acting on Inside Information

If you are aware of material nonpublic information relating to the Company, you may not, either directly or through family members or other persons or entities:

- Buy or sell securities of the Company (other than as explained herein), or

- Engage in any other action to take personal advantage of that information, or

- Pass that information on to others outside the Company, including family and friends.

Also, if you learn of material nonpublic information about another company with which the Company does business, including a customer or supplier, you may not trade in the other company's securities until the information becomes public or is no longer material.

Transactions that may be necessary or justifiable for independent, personal reasons (such as the need to raise money for an emergency expenditure) are not exempted from these rules. The securities laws do not recognize such mitigating circumstances, and, in any event, even the appearance of an improper transaction must be avoided to preserve the Company's reputation for adhering to the highest standards of conduct.

When Information Becomes Public

Information is not deemed to become "public" until the information has been disclosed broadly to the marketplace (such as by Company press releases or an SEC filing) and the investing public has had time to absorb the information fully. Nonpublic information may include: information available to a select group of analysts or brokers or institutional investors; undisclosed facts that are the subject of rumors, even if the rumors are widely circulated; and information that has been entrusted to the Company on a confidential basis until a public announcement of the information has been made and enough time has passed for the market to absorb and respond to a public announcement of the information.

To avoid the appearance of impropriety, information will not be considered fully absorbed by the marketplace until the third trading day after the day the information has been publicly disclosed.

Examples:

If the Information is Announced:	You May Begin Trading:
Monday	Thursday
Friday	Wednesday
Friday Before a Monday Holiday	Thursday

You are urged to contact the Company's General Counsel if you have any questions as to whether any particular information is or is not public.

What Constitutes Material Information

Material information is any information that a reasonable investor would consider important in making a decision to buy, hold, or sell securities. *Any information that might reasonably be expected to affect the Company's stock price, whether it is positive or negative, should be considered material.* Material information is not limited to historical facts but may also include projections and forecasts. Some examples of information that would ordinarily be regarded as material are:

- Projections of future earnings or losses, or other earnings guidance;
- Earnings that are inconsistent with the consensus expectations of the investment community;
- Developments regarding significant litigation or government agency investigations;
- Extraordinary borrowings;
- Major changes in accounting methods or policies;
- Cybersecurity risks and incidents, including vulnerabilities and breaches;
- Changes in debt ratings;
- A pending or proposed merger, acquisition, or tender offer;
- A pending or proposed acquisition or disposition of a significant asset;
- A change in dividend policy, the declaration of a stock split, or an offering of additional securities;
- A change in management;
- Development of a significant new product or process;
- Impending bankruptcy or the existence of severe liquidity problems;
- The gain or loss of a significant customer or supplier.

Anyone scrutinizing your transactions will be doing so after the fact, with the benefit of hindsight. As a practical matter, before engaging in any transaction, you should carefully consider how enforcement authorities and others might view the transaction in hindsight.

Whether information is "material" may be difficult to determine. When in doubt about whether particular nonpublic information is material, you should presume it is material. Again, you are urged to contact the

Company's General Counsel if you have any questions as to whether any particular information is or is not material.

No Individual Disclosure of Information

You may not disclose information about the Company to anyone outside the Company, including family members and friends, and you may not discuss the Company or its business online, including in an internet "chat room" or similar internet-based forum, even if you believe you are posting anonymously.

Other Prohibited Transactions

The Company considers it improper and inappropriate for any director, officer, or other employee of the Company to engage in speculative transactions in the Company's securities or other transactions which might give the appearance of impropriety. A broker or a person whom you deem to be investment savvy may suggest one of the following, more sophisticated types of transactions, all of which are prohibited. If you are unsure about the type of transaction that has been suggested to you, please contact the Company's General Counsel. Examples of these types of prohibited transactions include:

- **Short-term Trading.** Company insiders who purchase Company securities may not sell any Company securities of the same class for at least six months after the purchase.
- **Short Sales.** Company insiders may not sell the Company's securities short.
- **Derivative Securities.** You may not engage in transactions in puts, calls, or other derivative securities based on the Company's securities. This includes transactions with warrants.
- **Hedging Transactions.** The best way to understand hedging is to think of it as insurance. When people decide to hedge, they are insuring themselves against a negative event. This doesn't prevent a negative event from happening, but if it does happen and you're properly hedged, the impact of the event is reduced. Hedging occurs almost everywhere, and we see it every day. For example, if you buy house insurance, you are hedging yourself against fires, break-ins, or other unforeseen disasters. Ask your broker or the Company's General Counsel for details.
- **Margin Accounts and Pledges.** You may not purchase Company securities on margin or borrow against any account in which Company securities are held, or pledge Company securities as collateral for a loan.

Exceptions

<u>Pre-Approved 10b5-1 Plan</u>

These trading restrictions do not apply to transactions under a pre-existing written plan, contract, instruction, or arrangement under Rule 10b5-1 under the Securities Exchange Act of 1934 that meet the following requirements:

- it has been reviewed and approved in writing by the Company's General Counsel at least one week in advance of being entered into (or, if revised or amended, such proposed revisions or

amendments have been reviewed and approved by the Company's General Counsel at least one week in advance of being entered into);

- it provides that no trades may occur thereunder until expiration of the applicable cooling-off period specified in Rule 10b5-1(c)(ii)(B), and no trades occur until after that time. The appropriate cooling-off period will vary based on the status of the Company insider. For directors and officers, the cooling-off period ends on the later of (x) 90 days after adoption or certain modifications of the 10b5-1 plan; or (y) two business days following disclosure of the Company's financial results in a Form 10-Q or Form 10-K for the quarter in which the 10b5-1 plan was adopted. For all other Company insiders, the cooling-off period ends 30 days after adoption or modification of the 10b5-1 plan. This required cooling-off period will apply to the entry into a new 10b5-1 plan and any revision or modification of a 10b5-1 plan;
- it is entered into in good faith by the Company insider, and not as part of a plan or scheme to evade the prohibitions of Rule 10b5-1, at a time when the Company insider is not in possession of material nonpublic information about the Company; and, if the Company insider is a director or officer, the 10b5-1 plan must include representations by the Company insider certifying to that effect;
- it gives a third party the discretionary authority to execute such purchases and sales, outside the control of the Company insider, so long as such third party does not possess any material nonpublic information about the Company; or explicitly specifies the security or securities to be purchased or sold, the number of shares, the prices and/or dates of transactions, or other formula(s) describing such transactions; and
- it is the only outstanding Approved 10b5-1 Plan entered into by the Company insider (subject to the exceptions set out in Rule 10b5-1(c)(ii)(D)).

For the avoidance of doubt, no Approved 10b5-1 Plan may be adopted when the Company is in a blackout period. Please see the section below titled "Quarterly Blackout Periods" for more information. If you have any questions about whether or when the Company is or will or will not be in a blackout period, you must consult the Company's General Counsel.

If you are considering entering into, modifying, or terminating an Approved 10b5-1 Plan or have any questions regarding Approved Rule 10b5-1 Plans, please contact the Company's General Counsel. You should consult your own legal and tax advisors before entering into, or modifying or terminating, an Approved 10b5-1 Plan. A trading plan, contract, instruction, or arrangement will not qualify as an Approved 10b5-1 Plan without the prior review and approval of the Company's General Counsel as described above.

<u>Transactions under Company Plans</u>

- **401(k) Plan.** Investing 401(k) plan contributions in a Company stock fund in accordance with the terms of the Company's 401(k) plan. However, any changes in your investment election regarding the Company's stock are subject to trading restrictions under this Policy.

- **Stock Option Exercises.** These rules do not apply to your exercise of an employee stock option given to you under and in connection with the Company's Stock Incentive Plan or similar plan from time to time in effect, unless it is a sale of stock that is part of a broker-assisted cashless

exercise of an option or any other market sale for the purpose of generating the cash needed to pay the exercise price of an option.

HOW TO TRADE

Pre-Clearance Requirement

While you are subject to these rules, you may not engage in any transaction involving the Company's securities (including a stock plan transaction such as an option exercise, gift, loan or pledge or hedge, contribution to a trust, or any other transfer) without first obtaining written pre-clearance of the transaction. A written request for pre-clearance should be submitted to Human Resources at least one week in advance of the proposed transaction. If the proposed transaction does not occur during the anticipated period, pre-clearance of the transaction must be re-requested. The Company's General Counsel is under no obligation to approve a trade submitted for pre-clearance and may determine not to permit the trade, and they will have no liability for any refusal to permit a trade or for any delay in making or communicating a decision. Pre-clearance is not required for purchases and sales of securities under an Approved 10b5-1 Plan once the applicable cooling-off period has expired. No trades may be made under an Approved 10b5-1 Plan until expiration of the applicable cooling-off period. With respect to any purchase or sale under an Approved 10b5-1 Plan, the third-party effecting transactions on behalf of the Company insider should be instructed to send duplicate confirmations of all such transactions to the Company's General Counsel.

Quarterly Blackout Periods

The Company's announcement of its quarterly financial results almost always has the potential to have a material effect on the market for the Company's securities. Therefore, in order to avoid even the appearance of trading while aware of material nonpublic information, you generally will not be pre-cleared to trade in the Company's securities during the following periods:

Quarterly Blackout Period Begins:	Seven (7) days prior to the end of the Company's fiscal quarter. (The Company's fiscal quarters end on March 31, June 30, September 30, and December 31 of each year.)
Quarterly Blackout Period Ends:	At the close of trading on the Over-the-Counter Bulletin Board, or any exchange upon which the Company's stock is listed for trading on the second full trading day following the Company's filing of its quarterly report with the Securities and Exchange Commission.

Event-Specific Blackouts

From time to time, an event may occur that is material to the Company and is known by only a few individuals inside the Company. If you are one of those individuals, or if it would appear to an outsider that you were likely to have had access to information about such an event, then you will not be allowed to trade in the Company's securities so long as the event remains material and nonpublic.

Also, the Company may on occasion issue interim earnings guidance or other potentially material information by means of a press release, SEC filing on Form 8-K, or other means designed to achieve widespread dissemination of the information. You should anticipate that trades are unlikely to be pre-cleared while the Company is in the process of assembling the information to be released and until the information has been released and fully absorbed by the market. The existence of an event-specific blackout will not be announced. If you request pre-clearance of a transaction in the Company's securities during an event-specific blackout, you will be informed of the existence of a blackout period, but you may not be advised of the reason for the blackout.

If you are made aware of the existence of an event-specific blackout, you should not disclose the existence of the blackout to any other person. Whether or not you are designated as being subject to an event-specific blackout, you still have the obligation not to trade while aware of material nonpublic information. The prohibitive rules described herein and imposed by the Company upon you as a term of your employment or retainer cease to apply to your transactions in Company securities upon the expiration of any "blackout period" in existence at the time of the termination of your service as a director, executive, officer, or employee. Be aware that many of the federal rules may continue to apply to you after the termination of your service with the Company.

COMPANY ASSISTANCE

Compliance with this Policy by all employees is of the utmost importance both for the employee and for the Company. If you have any questions about Insider Trading or its application to any proposed transaction you may obtain additional guidance from the Company's General Counsel Jim Skoulikas, or the Company's Sr. Vice President, Human Resources who can be reached by telephone at (480) 968-1488 ext. 5021. Ultimately, however, the responsibility for adhering to Insider Trading rules and avoiding unlawful transactions rests with you.

ADOPTED: This 1st day of January 2025.

Receipt and Acknowledgement of Insider Trading Policy

I, _____ , acknowledge that I have received and read a copy of the **Insider Trading Policy** of VirTra, Inc. I understand the contents of the policy and I agree to comply with the policy and procedures set out in this document.

I understand that I should approach the Sr. Vice President, Human Resources or General Counsel if I have any questions about the Insider Trading Policy generally or any questions about reporting a violation of the policy.

_____

[SIGNATURE]

_____

[PRINTED NAME]

_____

[DATE]

To be signed and returned to Human Resources.