

GENERAL FUSION GROUP LTD. CORPORATE DISCLOSURE POLICY

PURPOSE

General Fusion Group Ltd. (the “**Company**”) is committed to ensuring informative, timely and accurate disclosure of material information concerning the Company to the public and to provide fair and equal access to such information through broadly disseminated disclosure.

Accordingly, the purpose of this Corporate Disclosure Policy (this “**Policy**”) is to ensure that:

1. the Company complies with its timely disclosure obligations as required under applicable exchange rules and Canadian and U.S. securities laws, including National Instrument 51-102 – *Continuous Disclosure Obligations*, National Policy 51-201 – *Disclosure Standards*, *Regulation FD* and *Rule 10b-5 of the Securities Exchange Act of 1934*;
2. the Company prevents the selective disclosure of material changes (as defined herein) to analysts, institutional investors, market professionals and others;
3. documents released by the Company or public oral statements made by a person with actual, implied or apparent authority to speak on behalf of the Company that relate to the business and affairs of the Company do not contain a misrepresentation (as defined herein); and
4. all persons to whom this Policy applies understand their obligations to preserve the confidentiality of Material Non-public Information (as defined herein) and to restrict access to Material Non-public Information to those who need to know it.

APPLICATION OF POLICY

This Policy applies to the groups of persons set out in the attached **Error! Reference source not found.** (Contractors, Directors, Employees and Officers (each as defined in **Error! Reference source not found.**)) (collectively, “**Company Personnel**”). **Error! Reference source not found.**

DISCLOSURE COMMITTEE

- A. *Structure of the Disclosure Committee.*** The Company has created a corporate disclosure committee (the “**Disclosure Committee**”) which is responsible for implementing this Policy. The Disclosure Committee consists of the Chief Executive Officer, Chief Financial Officer (and in the absence of a Chief Financial Officer, the Senior Vice President Finance), Chief Strategy Officer, General Counsel and/or such other persons as may be designated by the Chief Executive Officer at any time and from time to time. The composition of the Disclosure Committee may change from time to time. The Disclosure Committee may adopt disclosure controls and procedures in addition to those set out in this Policy.
- B. *Responsibilities of the Disclosure Committee.*** The Disclosure Committee shall have the responsibility to:
1. review and approve, before it is Generally Disclosed (as defined herein), each Document (as defined herein) to assess the quality of the disclosures made in the Document including, but not limited to, whether the Document is accurate and complete in all material respects;

2. make determinations about whether:
 - (a) a material change (as defined herein) has occurred;
 - (b) selective disclosure has been or might be made; or
 - (c) a misrepresentation has been made;
 3. oversee the design and implementation of the Company's "disclosure controls and procedures," which are defined as controls and procedures that are designed to ensure that information required to be disclosed by the Company in its Core Documents is recorded, processed, summarized and reported within the specified time periods;
 4. periodically evaluate the effectiveness of the Company's disclosure controls and procedures, particularly prior to the filing of each Core Document;
 5. in its discretion, conduct interim evaluations of the Company's disclosure controls and procedures in the event of significant changes in securities regulatory requirements, IFRS/Canadian/U.S. GAAP, legal or other regulatory policies, or stock exchange requirements, or if it otherwise considers such evaluations appropriate;
 6. educate the Directors, Officers, Employees and Contractors about the matters contemplated by this Policy; and
 7. monitor the effectiveness of, and compliance with, this Policy and report to the Board on the operation of this Policy and the effectiveness of the disclosure controls and procedures, and recommend any necessary changes to this Policy to the Nominating and Corporate Governance Committee of the Board including any changes required so that it complies with changing requirements and best practices.
- C. *Consulting Outside Advisors.*** The Disclosure Committee may consult with the Company's legal counsel and other appropriate expert advisors as it considers necessary in connection with this Policy.
- D. *Meetings of the Disclosure Committee.*** The Disclosure Committee will meet at such time and in such manner (including by telephone or video-conference) as shall be necessary or appropriate. A meeting of the Disclosure Committee may be convened without notice and without formality provided that a quorum of a majority of the members of the Disclosure Committee is present in person or by conference call. In the event one or more members of the Disclosure Committee is unavailable, the Chief Executive Officer may appoint an alternate for one or more meetings. The functions and responsibilities of the Disclosure Committee may be fulfilled by way of circulation of email or other form of communication to the members of the Disclosure Committee without the need for a meeting to be convened.
- E. *Access.*** The Disclosure Committee shall have full access to the Company's records and personnel.

INDIVIDUALS WHO ARE AUTHORIZED TO SPEAK ON BEHALF OF THE COMPANY

Unless otherwise authorized by the Disclosure Committee, only the following individuals ("**Spokespersons**") are authorized to make public oral statements or initiate contacts with analysts, the media and investors. As well, only the Spokespersons are authorized to respond to analysts, the media and

investors on behalf of the Company and only with respect to the areas noted opposite their names. The list may be changed by the Disclosure Committee from time to time.

Spokesperson	Area
Chief Executive Officer	All Areas
Chief Financial Officer (or in the absence thereof, Senior Vice President, Finance)	All Areas
Chief Strategy Officer	All Areas
Vice President, External Relations	All Areas
Director, Investor Relations	All Areas

Certain Employees or Contractors may be designated by a Spokesperson (each, a “**Spokesperson Delegate**”) to respond to questions from analysts, investors, the media, stakeholders and others seeking information about the Company’s financial and business affairs, conduct interviews and communicate information to the media on limited matters or to make presentations relating to their specific operating divisions or areas of responsibility. If any questions cannot be answered in this manner by such personnel, the enquiry shall be referred to the Spokesperson of which he or she is a delegate.

If you are not a Spokesperson and are approached by the media, an analyst, investor or any other member of the public to comment on the business and affairs of the Company, you must refer all (i) inquiries from investors, analysts and other market professionals to the Director, Investor Relations and (ii) media inquiries to the Vice President, External Relations and, in either case, immediately notify such person that the approach was made.

All Spokespersons and Spokesperson Delegates shall be limited to providing information from previously disseminated publicly available information or as otherwise expressly authorized by the Disclosure Committee.

PROCEDURES REGARDING THE PREPARATION AND RELEASE OF DOCUMENTS

The procedures in this section apply to all Directors, Officers, Employees and Contractors.

A “**Document**” means any public written communication, including a communication prepared and transmitted in electronic form:

- that is required to be filed with a securities regulatory authority either on the System for Electronic Document Analysis and Retrieval (“**SEDAR+**”) or the Electronic Data Gathering, Analysis, and Retrieval system (“**EDGAR**”) websites;
- that is not required to be filed with a securities regulatory authority or on the SEDAR+ or EDGAR websites, but is so filed;
- that is filed or required to be filed with a government or an agency of a government under applicable law or with any stock exchange or similar institution under its bylaws, rules or regulations; or

- the content of which would reasonably be expected to affect the market price or value of the securities of the Company.

A “**misrepresentation**” means:

- an untrue statement of a material fact (as defined herein); or
- an omission to state a material fact that is required to be stated or that is necessary to make a statement not misleading in the circumstances in which it is made.

For the purpose of this Policy, the following documents are “**Core Documents**”:

- prospectuses;
- take-over bid circulars;
- issuer bid circulars;
- directors’ circulars;
- rights offering circulars;
- management’s discussion and analysis (“**MD&A**”);
- annual information forms;
- information circulars;
- annual financial statements;
- interim financial statements;
- material change reports and reports on Form 6-K; and
- annual reports on Form 20-F or Form 40-F, as applicable.

Prior to the time that any Document is to be released to the public, filed with a securities regulatory authority or filed on SEDAR+ or EDGAR, the following procedures must be observed:

1. the Document must be prepared in consultation with, and be reviewed by, personnel in all applicable internal departments of the Company, and input from external experts and advisors should be obtained as necessary;
2. any Core Document must be reviewed and approved by the Disclosure Committee and by the Board;
3. any press release must be reviewed and approved by the Disclosure Committee;
4. in the event a report, statement or opinion of any expert is included or summarized in a Document, the written consent of the expert to the use of the report, statement or opinion

or extract thereof and the specific form of disclosure will be obtained if so required by law. In addition, the Disclosure Committee must be satisfied that:

- (a) there are no reasonable grounds to believe that there is a misrepresentation in the part of the Document made on the authority of the expert; and
 - (b) the part of the Document made on the authority of the expert fairly represents the expert report, statement or opinion; and
- 5. in the case of interim financial statements, annual financial statements, interim and annual MD&A, and financial results and earnings guidance press releases, such Documents must be reviewed and approved by the Audit Committee of the Board in accordance with the Audit Committee Charter following approval of the Disclosure Committee and prior to submission to the Board as a whole;
 - 6. in the case of scientific and technical information contained in any Document (including for certainty news releases), such Documents must also be reviewed and approved by the Disclosure Committee and Science and Technology Committee in advance, and then by the Board; and
 - 7. Core Documents must be provided to the Board sufficiently in advance of the time they are to be filed or released to allow the Board to review and comment on such Core Documents.

In the event that a Document contains any Forward-Looking Information (as defined below) this information must be specifically identified as such and include reasonable cautionary language in accordance with applicable law.

“Forward-Looking Information” means all disclosure regarding possible events, conditions or results (including future-oriented financial information with respect to prospective results of operations, a prospective financial position or prospective changes in financial position that is based on assumptions about future economic conditions and courses of action) that is presented as either a forecast or a projection. An example would be the discussion of trends and prospects for the Company in its MD&A. Where applicable, forward-looking statements are intended to be subject to the safe harbor provisions of applicable Canadian and U.S. securities laws, including the U.S. Private Securities Litigation Reform Act of 1995.

PROCEDURES REGARDING PUBLIC ORAL STATEMENTS

The procedures in this section apply to all Directors, Officers, Employees, Contractors, Spokespersons and any other person with actual or implied authority to make a public oral statement (as defined below).

A **“public oral statement”** is any oral statement made in circumstances in which a reasonable person would believe that information contained in the statement will become Generally Disclosed. Examples include speeches, presentations, news conferences, interviews and discussions with analysts where the Company’s business and affairs, prospects or financial condition is discussed. The following procedures should be observed in respect of any public oral statements made by or on behalf of the Company:

- 1. such public oral statements should be made only by the Spokespersons (or Spokesperson Delegates) authorized by this Policy to make public oral statements on behalf of the Company; and

2. any public oral statement referring to a statement, report or opinion of an expert in whole or in part must have the prior written consent of said expert prior to a Spokesperson (or Spokesperson Delegate) making a public oral statement related thereto if so required by law.

TIMELY DISCLOSURE OF MATERIAL INFORMATION

“**Material Information**” consists of “material facts” and “material changes.”

A “**material fact**” means a fact that significantly affects, or would reasonably be expected to have a significant effect on, the market price or value of the securities of the Company.

A “**material change**” means a change in the business, operations or capital of the Company that would reasonably be expected to have a significant effect on the market price or value of any of the securities of the Company and includes a decision to implement such a change if such a decision is made by the Board or by senior management of the Company who believe that confirmation of the decision by the Board is probable.

The materiality of information will depend on the specific facts and circumstances. Examples of categories of information (whether positive or negative) that are more likely to be considered material, or may be presumptively material, include:

- Financial results or financial condition
- Projections of future earnings or losses
- Significant product developments, such as new products or product modifications, and developments affecting the Company’s resources, technology, products or market
- Entering into or loss of significant contracts
- Significant fusion technical results, such as achieving or not achieving certain specified Company goals or milestones
- Gain or loss of a significant customer or supplier relationship
- New equity or debt offerings
- Significant litigation or regulatory exposure due to actual or threatened litigation or regulatory action
- Significant management changes or changes in control of the Company
- A pending or proposed significant merger, or significant divestiture or acquisition
- Default under a significant financing arrangement, or financial liquidity problems
- Significant restructuring actions or asset impairments

- Changes in capital structure
- Borrowing of a significant amount of funds
- Changes in auditors
- Take-over bids or issuer bids
- Significant events regarding the Company's securities (such as defaults, redemptions, stock splits, repurchase plans, changes in dividends).

Any person to whom this Policy applies who becomes aware of information that has the possibility of being Material Information that has not been Generally Disclosed (as defined below) must immediately disclose that information to a member of the Disclosure Committee. The fact that it may not be clear or certain as to whether the information is Material Information, should not delay this notification. The information should then be passed on to the other members of the Disclosure Committee promptly.

Upon the occurrence of any change that may constitute a material change, the Disclosure Committee, in consultation with such other advisors as it may consider necessary, will:

1. consider whether the event, on its own or as part of a sequence of events, constitutes a material change;
2. if it does constitute a material change, prepare a press release, material change report and Form 6-K describing the material change as required under applicable securities laws;
3. determine whether a reasonable basis exists for filing the material change report on a confidential basis; and
4. to the extent practicable, circulate the draft press release, material change report and Form 6-K to the members of the Board and ensure such press release is issued on a timely basis in compliance with applicable securities laws and make any applicable filings.

In general, filings will not be made on a confidential basis although, in exceptional circumstances and provided delayed disclosure is permissible (such as in relation to a potential acquisition), confidential disclosure may be appropriate. The filing of a material change report on a confidential basis under Canadian securities laws does not relieve the Company of any independent obligations under U.S. securities laws to file a Form 6-K or similar report.

In assessing disclosure obligations, the Disclosure Committee will consider disclosure requirements under both Canadian securities laws and U.S. securities laws independently. Certain events may require public disclosure or filing under U.S. securities laws or stock exchange rules even if they do not constitute a "material change" under Canadian securities laws.

CONFERENCE CALLS

Conference calls may be held for quarterly earnings and major corporate developments, accessible simultaneously to all interested parties, some as participants by telephone, and others in a listen only mode by telephone or via a webcast over the Internet. The call will be preceded by a press release containing all relevant Material Information. At the beginning of the call, a Spokesperson will provide appropriate cautionary language regarding any Forward-Looking Information and direct participants to publicly

available documents containing the assumptions, sensitivities and a full discussion of the risks and uncertainties, if any, applicable to the news.

The Company will provide advance notice of the conference call and webcast by issuing a press release announcing the date, time and topic and providing information on how interested parties may access the call and webcast. These details will be provided on the Company's website. In addition, the Company may send invitations to analysts, institutional investors, the media and others. Any non-material supplemental information provided to participants will also be posted to the website for others to view.

A tape recording of the conference call and/or an archived audio webcast on the Internet will be made available following the call for a minimum of twelve months.

QUIET PERIODS

From time to time, the Company may impose quiet periods in advance of the release of quarterly or annual financial results or other significant disclosures. During such periods, Company personnel must refrain from discussing the Company's financial performance, outlook or guidance, other than through publicly disclosed materials approved in accordance with this Policy or to respond to inquiries concerning publicly available or non-Material Information.

INTERNET CHAT ROOMS, BULLETIN BOARDS AND SOCIAL MEDIA

The procedures in this section apply to all Directors, Officers, Employees, Contractors and any other person with actual or implied authority to make a public oral statement.

The term "**social media**" includes, but is not limited to, platforms such as Facebook, Instagram, Twitter, LinkedIn, YouTube, blogs, discussion forums, wikis, virtual worlds, online communities and any other similar platform. By its very nature, social media is constantly evolving and, as such, all forms of collaborative online communication are within the scope of this Policy and may be amended from time to time.

In order to help ensure that no Material Non-public Information is inadvertently disclosed, only Spokespersons and other persons expressly authorized by a Spokesperson shall participate in any social media discussing corporate matters or securities of the Company. Notwithstanding anything to the contrary in this Policy, Directors, Officers, Employees and Contractors may post previously filed press releases on their social media platforms provided that no additional commentary, interpretation, endorsement or explanation is included, which could reasonably be construed as negative or derogatory.

Directors, Officers, Employees and Contractors must advise the General Counsel or the Chief Executive Officer if they are aware of any discussion of information regarding the Company on social media not authorized by this Policy.

The Company respects the right of its employees to use social media as a means of personal expression. Nothing in this Policy is intended to improperly restrict lawful personal expression or protected activity. However, when referencing the Company, one's freedom of expression does not allow him or her to disclose confidential or Material Non-public Information, create the appearance of speaking on behalf of the Company without authorization, or cause prejudice to the Company, its clients, suppliers, business partners, products, and employees, or to publicly challenge their decisions. Directors, Officers, Employees, Contractors and any other person must act responsibly when using social media.

All employees are personally responsible for the content they publish on social media. It is important to remember that what is published on social media becomes public and can be accessible for a long time, notably by the Company's management, co-workers and business partners. The use of social media must respect the privacy and protection of the confidential information of the Company, its employees, clients, suppliers and business partners, and the protection of that information is an integral part of this Policy.

Reasonable personal use of social media during non-working time or breaks is permitted, provided such use does not interfere with work performance or violate this Policy or other Company policies.

Outside working hours or during breaks or meal periods, the use of social media must be done with discretion, courtesy and respect for others. For example, but not limited to, any action, comment, statement, articles, situation updates, photos and videos that may discredit the Company or its subsidiaries, affiliates, or any of their respective employees, officers, shareholders, directors, customers, suppliers or business partners, that may harm their respective reputations or that may lead to a contravention or a breach by the Company of any of its obligations will not be tolerated.

At all times, racist, hateful, vulgar, threatening, harassing, unsightly, abusive or otherwise offending language whether oral, written or online, is strictly prohibited.

All Company email addresses are the Company's corporate property, and all correspondence sent or received via such email addresses, is considered corporate correspondence on behalf of the Company and is subject to the provisions of this Policy. At no time shall the Company's email address be used to create a personal profile or account on social media.

RUMOURS

The Company's general policy is not to comment, affirmatively or negatively, on rumours or speculation (including rumours and speculation on the Internet). Generally, Spokespersons will respond consistently to those rumours or speculation by saying "It is our policy not to comment on market rumours or speculation."

However, if a relevant stock exchange or a securities regulatory authority requests that the Company make a statement in response to a market rumour, the Disclosure Committee will consider the matter and make a recommendation to the Chief Executive Officer as to the nature and context of any response.

WEBSITE

The Company's website must be maintained in accordance with this Policy.

The Disclosure Committee will review or designate appropriate management personnel to review the disclosure on the Company's website periodically to ensure that it remains accurate and consistent with this Policy.

Timely disclosure documents will be posted as soon as possible, but only after they have been Generally Disclosed. Disclosure on the Company's website or other online networks alone will not satisfy the Company's obligation to have Material Information Generally Disclosed. The Company generally discloses Material Information by press release in a manner designed to obtain the widest level of public dissemination. Any disclosure of Material Information on the Company's website or other online networks must be preceded by the issuance of a press release in accordance with this Policy.

All information posted on the Company's website will be dated as of the date it is prepared and, if applicable, modified. Information will be updated or corrected as required (it is not sufficient that

information is corrected or updated elsewhere). Information will be deleted and archived after at least 12 months. Information that is incorrect or that becomes inaccurate over time will also be deleted and archived, and a correction posted.

So long as the Company is listed on Nasdaq, all information that is required to be disclosed publicly shall remain available on the Company's website for a minimum period of five (5) years from the date of its original publication.

The Company's website will include a cautionary statement that information posted on the Company's website was accurate at the time of posting, but may be superseded by later information.

CONFIDENTIALITY OF MATERIAL NON-PUBLIC INFORMATION

"Material Non-public Information" means Material Information that has not been Generally Disclosed.

"Generally Disclosed" means information disclosed or published by means of a broadly disseminated press release or a filing with EDGAR and SEDAR+, or through a broadly accessible webcast or conference call that has been pre-announced by such a press release or filing, and sufficient time has passed (two trading days, unless advised by the General Counsel that the period is longer or shorter) to allow the information to become widely available among investors and the financial community.

Any person to whom this Policy applies and who has knowledge of Material Non-public Information must treat the Material Information as confidential until the Material Information has been Generally Disclosed.

Material Non-public Information will not be disclosed to anyone except in the necessary course of business or otherwise in compliance with applicable securities laws. If Material Non-public Information has been disclosed in the necessary course of business, anyone so informed must clearly understand that it is to be kept confidential, that they cannot trade, or assist others to trade, in the Company's securities until the Material Information is Generally Disclosed and, in appropriate circumstances, they execute a confidentiality agreement.

When in doubt, consult with a member of the Disclosure Committee to determine whether disclosure in a particular circumstance is in the necessary course of business or is otherwise permitted under applicable securities laws.

Error! Reference source not found. For greater certainty, disclosure to analysts, institutional investors, other market professionals and members of the press and other media will not be considered to be in the necessary course of business. **"Tipping"**, which refers to the disclosure of Material Non-public Information to third parties outside the necessary course of business or otherwise permitted under applicable securities laws, is prohibited. See the *"Insider Trading Policy"* of the Company.

From time to time, the Company may be involved in transactions or proposed transactions with another company that may result in Directors, Officers, Employees or Contractors of the Company having confidential information about that other company. This information must be treated as Material Non-public Information in accordance with this Policy, as if it were Material Non-public Information about the Company.

Company Personnel shall not input Material Non-public Information into publicly available generative artificial intelligence tools or use such tools to prepare external communications concerning the Company unless specifically approved by the Disclosure Committee.

AVOIDING SELECTIVE DISCLOSURE

The Company will not make disclosure of Material Non-public Information to selected individuals (such as securities professionals (including analysts), institutional or other investors and the media) if it has not been Generally Disclosed or is otherwise permitted under applicable securities laws as confirmed by the Disclosure Committee. Disclosure in individual or group meetings does not constitute adequate disclosure of information that is considered Material Non-public Information.

When participating in shareholder meetings, news conferences, analysts' conferences and private meetings with analysts or institutional investors, Spokespersons must only disclose information that either (1) is not Material Information or (2) is Material Information but has previously been Generally Disclosed. Any selective disclosure of Material Non-public Information, including earnings guidance, is not permitted.

If Material Non-public Information is inadvertently disclosed, the Disclosure Committee will (1) consider whether the information must be Generally Disclosed, including under Rule 100(a)(2) of Regulation FD, (2) contact the parties to whom the Material Information was disclosed and inform them: (a) that the information is Material Non-public Information, and (b) of their legal obligations with respect to the Material Information, and (3) take such other action as may be appropriate.

The Disclosure Committee may approve limited exceptions to this prohibition where disclosure is made to the Company's auditors, legal counsel, underwriters or other professional advisors or under executed confidentiality agreements, in the necessary course of the Company's business or is otherwise permitted under applicable securities laws.

ANALYST REPORTS AND FINANCIAL MODELS

Upon request, the Company may review analysts' draft research reports and financial models. When reviewing such documents, comments of Directors, Officers, Employees and Contractors must be limited to identifying inaccuracies or omissions of factual information that has been Generally Disclosed. No comfort or guidance will be expressed on the analysts' earnings models or earnings estimates and no attempt will be made to influence an analyst's opinion or conclusion.

In order to avoid appearing to "endorse" an analyst's report or model, the Company will provide its comments orally or will attach a disclaimer to written comments to indicate the report was reviewed only for factual accuracy. No comfort or guidance shall be expressed on the analysts' earnings models or earnings estimates and no attempt shall be made to influence an analyst's opinion or conclusion.

Analyst reports are proprietary products from the analyst's firm, and re-circulating a report may be viewed as an endorsement by the Company of the report. As such, the Company will not directly distribute analysts' research reports to any person outside the Company or to its employees but, if requested, will advise which analysts follow the Company, accompanied by an appropriate disclaimer that the views expressed in any reports, including all forward-looking information, are the views of the analysts and not of the Company.

Analysts' reports will not be posted on or linked from the Company's website.

COMPLIANCE

Any person to whom this Policy applies and who violates this Policy may face disciplinary action up to and including termination of his or her employment with the Company without notice. The violation of this

Policy may also violate certain securities laws. If it appears that any Company Personnel may have violated such securities laws, the Company may refer the matter to the appropriate regulatory authorities, which could lead to penalties, fines or imprisonment.

SCHEDULE A

“Contractors” means independent contractors (who are engaged in an employee-like capacity) of the Company or any of its subsidiaries and are advised they are subject to this Policy;

“Directors” means directors of the Company or any of its subsidiaries;

“Employees” means full-time, part-time, contract or secondment employees, consultants, and other individuals and entities who are engaged or retained by the Company or its subsidiaries for a significant portion of their working hours; and

“Officers” means officers of the Company or any of its subsidiaries, as determined by the *Business Corporations Act* (British Columbia).

Approved: July 10, 2026.