

GENERAL FUSION GROUP LTD. INSIDER TRADING POLICY

PURPOSE

General Fusion Group Ltd. (the “**Company**”) is a publicly traded company listed on the Nasdaq, Inc. (“**Nasdaq**”) and/or the Toronto Stock Exchange (together with Nasdaq, the “**Exchanges**”). As such, trades in the Company’s securities¹ are subject to Canadian and U.S. securities laws, rules and regulations, as well as the rules and regulations of the Exchanges (collectively, “**securities laws**”).

The purpose of this Policy is to assist Company Personnel (as defined below) in complying with their obligations under applicable securities laws and stock exchange rules relating to “insider trading,” “tipping,” and reporting. This Policy does not replace your responsibility to understand and comply with the legal prohibitions on insider trading and, if applicable, your obligation for insider reporting.

It is also important that Company Personnel avoid the appearance of impropriety and remain in full compliance with securities laws while trading in securities of the Company. If you have any doubt as to whether a particular situation requires refraining from effecting a transaction in the Company’s securities or sharing information with others, such doubt should be resolved against taking such action.

COMPANY PERSONNEL

The following persons are required to observe and comply with this Policy:

1. all Directors, Officers, Contractors and Employees (each as defined in Appendix B hereto) of the Company or its subsidiaries;
2. any other person retained by or engaged in business or professional activity on behalf of the Company or any of its subsidiaries, that the Company’s General Counsel designates as being subject to this Policy;
3. with respect to any person covered by item (1) above, such person’s family member, spouse or other person living in the household or a dependent child, and any family members who do not live in such person’s household but whose transactions involving securities are directed by, or are subject to, such person’s influence or control (such as parents or children who consult with such person before they trade in securities); and
4. partnerships, trusts, corporations, Registered Retirement Savings Plans (“**RRSPs**”) and similar entities over which any of the above-mentioned individuals exercise control or direction.

For the purposes of this Policy, the persons listed above are collectively referred to as “**Company Personnel**.” Items (3) and (4) should be carefully reviewed by Company Personnel; those items have the effect of making various family members or holding companies or trusts of the persons referred to in Items (1) and (2) subject to the Policy. You are responsible for the transactions of these other people and therefore should make them aware of the need to confer with you before they trade in the Company’s securities.

In this Policy, the Company’s “General Counsel” is the Company’s General Counsel or such other officer as may be designated by the board of directors of the Company (the “**Board**”) from time to time.

¹“Securities” include common shares and any other security that the Company may issue including preferred shares, options, deferred share units, performance units, restricted stock, restricted stock units, stock appreciation rights, debentures, warrants, puts, calls and other derivative instruments with respect to such securities and any other securities that are convertible or exchangeable into such securities.

MATERIAL NON-PUBLIC INFORMATION

“Material Non-public Information” is Material Information that has not been Generally Disclosed (as such terms are defined below).

“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; and
- Significant events regarding the Company’s securities (such as defaults, redemptions, stock splits, repurchase plans, changes in dividends).

In addition, it is the policy of the Company that no Company Personnel who, in the course of working for or providing services to the Company, learns of Material Non-public Information about another company with which the Company does business, including a customer or supplier of the Company, or a counterparty

in negotiation of a material potential transaction, may trade in that other company's securities until the information becomes publicly available or is no longer material.

"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.

Information is "non-public" until it has been Generally Disclosed in the manner described above.

A **"trading day"** means any day on which the Exchanges are open for trading. In general, information may be presumed to have been available to investors at the close of trading on the first full trading day following the issuance of a news release disclosing Material Information. If, for example, the Company were to make an announcement prior to the commencement of trading on a Monday, you should not trade in the Company's securities until Wednesday. If the announcement is made after the commencement of trading on a Monday, Thursday would be the first eligible trading day.

Remember, 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.

If you have any doubt whether certain information is "material," or whether it has been Generally Disclosed, you should not trade or communicate such information.

PROHIBITED ACTIVITIES APPLICABLE TO ALL COMPANY PERSONNEL

The following activities are prohibited for all Company Personnel:

Insider Trading

Company Personnel must not engage in trading in any securities, whether of the Company or of any other public company, while you are aware of Material Non-public Information regarding such securities or the company that issued them (**"insider trading"**).

Under this Policy, "trading" includes any sale or purchase of securities of the Company, including but not limited to:

- (a) hedging or monetization transactions or similar arrangements with respect to securities of the Company;
- (b) holding Company securities in a margin account or pledging Company securities as collateral for a loan;
- (c) buying or selling puts or calls or other derivative securities on the Company's securities;
- (d) the exercise of stock options granted under the Company's stock option or equity awards plan; and
- (e) the purchase of any other securities under any other Company benefit plan or arrangement.

Transactions that may be necessary or justifiable for independent reasons (such as the need to raise money for an emergency expenditure) are not excepted from this Policy. 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.

Tipping

Company Personnel must not disclose Material Non-public Information or other confidential information relating to the Company, or other companies obtained in the course of service to the Company, to anyone, inside or outside of the Company (including family members), except in compliance with the Company's Corporate Disclosure Policy.

Company Personnel must not recommend or suggest that any person engage in transactions in securities, whether of the Company or any other company, while in possession of Material Non-public Information about those securities or that company ("**tipping**"). Both the person who provides the information (the "**tipper**") and the person who receives the information (the "**tippee**") are liable under securities laws if the tippee trades in securities based on the provided Material Non-public Information. This prohibition applies regardless of whether the tipper receives any personal benefit from the tip.

Limit Orders

Company Personnel are prohibited from placing limit orders or other pre-arranged transactions in Company securities that execute automatically, except for "same-day" limit orders placed during a permitted trading period and transactions pursuant to a Pre-Approved Trading Plan. A limit order placed during a permitted trading period that remains open and executes during a Blackout Period or at a time when you are aware of Material Non-public Information may result in a violation of securities laws.

ADDITIONAL PROHIBITED TRANSACTIONS

Certain types of trades in securities of the Company by Company Personnel can raise particular concerns about potential breaches of applicable securities laws or that the interests of the persons making the trade are not aligned with those of the Company. Company Personnel are therefore prohibited at any time from, directly or indirectly, undertaking any of the following activities:

Short-term Trading

No Company Personnel shall buy securities of the Company with the intention of quickly reselling such securities, or selling securities of the Company with the intention of quickly buying such securities (other than in connection with the acquisition and sale of shares issued under a securities-based compensation arrangement of the Company).

Short Sales

No Company Personnel shall directly or indirectly engage in a short sale of the Company's securities or any other arrangement that results in a gain only if the value of the Company's securities declines in the future (other than in connection with "cashless" exercises of stock options under the Company's equity compensation plans and the number of securities acquired on such exercise equals or exceeds the number of securities sold). In addition, Section 16(c) of the Securities Exchange Act of 1934, as amended (the "**Exchange Act**") prohibits officers and directors from engaging in short sales.

Publicly Traded Options

Company Personnel are prohibited from engaging in transactions in puts, calls or other derivative securities, on an exchange or in any other organized market.

Hedging Transactions

Company Personnel are not permitted to purchase financial instruments, including, for greater certainty, prepaid variable forward contracts, equity swaps, collars, or units of exchange funds, that are designed to

hedge or offset a decrease in market value of equity securities of the Company held, directly or indirectly, including equity securities granted as compensation.

Pledges

Company Personnel are prohibited from pledging Company securities as collateral for a loan. An exception to this prohibition may be granted where a person wishes to pledge Company securities as collateral for a loan (not including margin debt) and clearly demonstrates the financial capacity to repay the loan without resort to the pledged securities. Any Company Personnel who wishes to pledge Company securities as collateral for a loan must submit a request for approval to the Company's General Counsel at least five (5) trading days prior to the proposed execution of documents evidencing the proposed pledge.

Prohibition on Holding Securities in Margin Accounts

No Company Personnel shall purchase on margin or hold in a margin account with a brokerage firm, bank or other entity any securities of the Company. This means such persons are prohibited from borrowing from a brokerage firm, bank or other entity in order to purchase the Company's securities (other than in connection with "cashless" exercises of stock options under the Company's equity compensation plans and the exercise price of the securities acquired on such exercise equals or exceeds the amount borrowed).

POST-TERMINATION TRANSACTIONS

This Policy continues to apply to your transactions in Company securities even after your employment or other relationship with the Company and its subsidiaries terminates, for so long as you continue to be in possession of Material Non-public Information. If you are in possession of Material Non-public Information when your employment or other relationship terminates, you may not trade in Company securities until that information has been Generally Disclosed or is no longer material.

BLACKOUT PERIODS

From time to time, including on a regularly scheduled basis, as discussed below, the Company will impose a "Blackout Period" during which all, or certain identified, Company Personnel, are prohibited from any trading in Company securities (those persons subject to a "Blackout Period" are collectively referred to in this Policy as "Restricted Personnel").

Subject to the limited exceptions set out below, Restricted Personnel are prohibited from trading in the Company's securities during the period commencing on the first day after the end of each fiscal quarter of each financial quarter or financial year end, as the case may be, and ending 48 hours after the quarterly or annual financial results, as the case may be, are Generally Disclosed (a "**Scheduled Blackout Period**").

Additional restrictions on trading may be prescribed from time to time by the Company's General Counsel or Chief Executive Officer as a result of special circumstances (an "**Additional Blackout Period**" and, together with a Scheduled Blackout Period, a "**Blackout Period**"). All parties with knowledge of such special circumstances shall be covered by such Additional Blackout Period.

Every person subject to a Blackout Period who intends to purchase or sell securities of the Company, directly or indirectly, (or who stands to benefit from a purchase or sale of securities of the Company by a family member), during a Blackout Period is required to obtain the prior approval of the Company's General Counsel. The Company's General Counsel may waive the application of any particular Blackout Period in respect of one or more such person(s) when the Company's General Counsel has determined that it is not inappropriate, and the person(s) is/are not privy to Material Non-public Information. Such waiver shall be reported to the Company's Board.

Subject to any determination to the contrary by the General Counsel, Blackout Periods do not apply to trading activities pursuant to a Pre-Approved Trading Plan (defined below).

Trading outside the Blackout Periods or being excluded from the list of persons subject to the Blackout Periods will not relieve you from liability if you are aware of Material Non-public Information.

PRE-CLEARANCE

To help prevent inadvertent violations of securities laws and to avoid even the appearance of trading on inside information, the following persons may not engage in any transaction in the Company's securities (including a gift, contribution to a trust, or similar transfer) without first obtaining pre-clearance of the transaction from the Company's General Counsel:

- (a) Company Personnel who are "Reporting Insiders" of the Company (as defined in National Instrument 55-104 – Insider Reporting Requirements and Exemptions) (i.e., Company Personnel who are required to report their insider trading activities on the electronic filing system known as SEDI);
- (b) any other persons designated by the Company's General Counsel as being subject to the Company's pre-clearance procedures; and
- (c) any other person if such Company Personnel has control or direction over such securities (for example, if such Company Personnel has the authority to direct the sale or acquisition of Company securities by a personal holding company, spouse or minor children).

A request for pre-clearance should be submitted to the Company's General Counsel at least one (1) trading day in advance of the proposed transaction. The Company's General Counsel shall record the date each request is received and the date and time each request is approved or disapproved. Unless revoked, a grant of permission will normally remain valid until the close of trading five (5) trading days following the day on which it was granted. If the transaction does not occur during the five-day 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.

Pre-clearance is not required for purchases and sales of securities under a Pre-Approved Trading Plan (as defined below). With respect to any purchase or sale under a Pre-Approved Trading Plan, the third-party effecting transactions on behalf of the Insider should be instructed to send duplicate confirmations of all such transactions to the Company's General Counsel or the General Counsel's designee.

In the absence of the General Counsel, transactions may be pre-cleared by the Chief Financial Officer, provided that any transaction by the Chief Financial Officer or the Chief Financial Officer's family members may, in the absence of the General Counsel, only be approved by the Chief Executive Officer.

In any case where this Policy would require the Company's General Counsel or the General Counsel's family members to obtain pre-clearance of a plan or transaction, such pre-clearance may not be granted by the Company's General Counsel and must instead be granted by the Chief Financial Officer, or in the Chief Financial Officer's absence, the Chief Executive Officer.

PRE-APPROVED TRADING PLANS

Notwithstanding any of the prohibitions contained in this Policy, Company Personnel may trade in Company securities at any time pursuant to a trading plan that has been properly adopted and is properly administered in accordance with Rule 10b5-1 under the Exchange Act (a "**Rule 10b5-1 Plan**") and an

automatic securities purchase plan or automatic securities disposition plan, as defined in National Instrument 55-104 (an “**Automatic Securities Purchase or Disposition Plan**,” and together with a Rule 10b5-1 Plan, a “**Pre-Approved Trading Plan**” or “**Plan**”).

All adopted Pre-Approved Trading Plans must comply with all applicable policies established by the Company, in addition to complying with applicable Canadian and United States laws.

The rules applicable to Pre-Approved Trading Plans are complex and technical in nature, so you should not employ a Pre-Approved Trading Plan without obtaining advice from legal counsel. A Pre-Approved Trading Plan may not be adopted at any time when you are aware of Material Non-public Information or are subject to a Blackout Period.

Prior to adopting, amending, suspending or terminating a Pre-Approved Trading Plan, the Plan creator must confer with, and obtain the prior approval of, the Company’s General Counsel, which will be provided promptly.

Each Pre-Approved Trading Plan must satisfy the following criteria in order to be approved by the Company’s General Counsel:

- (a) the Plan must be in writing;
- (b) the Plan must not be entered into at a time when the Plan creator has Material Non-public Information;
- (c) the Plan must be entered into in good faith and not as a plan or scheme to evade the anti-fraud provisions of applicable securities laws;
- (d) at the time the Plan is entered into, the Plan creator must be in compliance with this Policy and any applicable Company share ownership policies, and entering into the Plan must not be inconsistent with those policies;
- (e) the Plan may not be adopted during a Blackout Period. In addition, the Plan creator will be required to certify in writing that, at the time the Plan creator enters into the Plan: (1) the Plan creator is not aware of any Material Non-public Information about the Company or its securities; and (2) the Plan creator is adopting the Plan in good faith and not as part of a plan or scheme to evade the prohibitions of Rule 10b-5;
- (f) the Plan must impose a mandatory waiting period between establishment of the Plan and the date the initial trade is made under the Plan, as follows: for directors and officers, SEC rules impose a “cooling off” period such that no trades can be initiated under a trading plan until the later of (1) 90 days after adopting or modifying the plan and (2) two business days after the release of final results on Form 10-Q, Form 10-K or Form 6-K for the fiscal quarter in which the plan was adopted (not to exceed 120 days after adoption). For all other employees, a 30-day cooling off period after adopting or modifying a plan is required under SEC rules before trading may commence;
- (g) the Plan must have a term of at least six (6) months and no more than two (2) years in order to minimize the need for any voluntary modifications, terminations or suspensions;
- (h) in order to eliminate any appearance that the Plan creator is trying to trade before a material development is announced, the Plan must not be designed to result in large trades at the beginning of the Plan term (Plans that could result in large trades at the beginning of the Plan term are permitted if the large trades are the result of a formula that does not favor large trades at the beginning of the Plan term);
- (i) the Plan’s terms shall specify a non-discretionary trading method, such as through a specified amount of securities to be purchased or sold and the price and date for each purchase or sale or a

written formula, algorithm or computer program for determining the amount, price and date for each transaction, and in any event the Plan shall not allow the Plan creator to exercise any subsequent influence over how, when or whether to make purchases or sales;

- (j) the Plan shall not delegate discretion for trading decisions to a broker or other agent, in order to avoid any inference of the Plan creator's improper influence or discretion over the Plan;
- (k) all Plans must use a broker accepted by the Company as suitable to implement Pre-Approved Trading Plans, rather than necessarily the Plan creator's own individual broker, in order to avoid any perception that an Insider is inappropriately communicating with or influencing the broker. This will also support timely trade notifications for Section 16(a) filings, as and when applicable to the Company;
- (l) the Company's General Counsel will require a pre-approved form of Plan, which would allow flexibility on specific trading terms of the Plan while ensuring that other Plan provisions remain consistent;
- (m) the Plan shall prohibit any modification, termination, suspension or lifting of a suspension of the Plan during a Blackout Period, and shall provide that if any modification, termination, suspension or lifting of a suspension is permitted, it must be subject to Company review and pre-approval in a manner similar to when the Plan was initially adopted;
- (n) any modification or change to the amount, price or timing of the purchase or sale under a trading plan is generally a termination of such plan and the adoption of a new plan according to SEC rules;
- (o) each Plan creator shall have no more than one Pre-Approved Trading Plan outstanding at any time;
- (p) subject to certain limited exceptions specified in Rule 10b5-1, a Plan creator may only enter into a Pre-Approved Trading Plan that is designed to effect an open market purchase or sale of the total amount of securities subject to the Plan as a single transaction (a "single-transaction plan") if the Plan creator has not entered into a single-transaction plan in the prior 12 months; and
- (q) the Plan shall otherwise comply with all applicable securities laws.

Transactions must be made strictly in accordance with the terms of the Pre-Approved Trading Plan; the Plan creator must not alter or deviate from the Plan (whether by changing the amount, price or timing of the sale or purchase, or otherwise) and the Plan creator must not enter into or alter a corresponding or hedging transaction or position with respect to the Company's securities subject to the Plan.

The Company may restrict the number of securities authorized to be traded through a Pre-Approved Trading Plan at any one time or during any specified trading day or period, based on the total trading volume at such time or during such day or period, the total number of securities traded at any one time or during any one period under all outstanding Pre-Approved Trading Plans, or such other criteria as the Company may consider appropriate.

Entering into, renewing, amending, modifying, terminating, suspending or lifting a suspension of a Pre-Approved Trading Plan must be done in good faith and not as part of a plan or scheme to evade the prohibitions of insider trading laws.

The Company may at any time conduct an internal review of Company Personnel trades and compliance with their Pre-Approved Trading Plans. Such reviews may be conducted annually or more frequently, and trades may also be reviewed following extreme price swings in the Company's stock price.

Once a Pre-Approved Trading Plan is established, the Plan creator may not trade securities of the Company outside of the Plan (other than in underwritten public offerings, the grant of securities by the Company to

the Plan creator pursuant to any Company equity plan, or the acquisition of shares upon the exercise of stock options by the Plan creator).

The Company reserves the right to consider and determine whether a public announcement of a Pre-Approved Trading Plan should be made, which may include the announcement of the adoption, any modification to, and the termination or suspension of the Plan, either through a press release or by a Form 6-K, 8-K or otherwise.

TRANSACTIONS UNDER COMPANY PLANS

Except for transactions pursuant to a Pre-Approved Trading Plan, the trading restrictions will apply to the acquisition of common shares through the exercise of the Company's stock options. In the event that the expiry date of stock options occurs during a Blackout Period, the expiry date of such stock options will be extended in accordance with the terms of the Company's security-based compensation plan.

INSIDER REPORTING OBLIGATIONS

Immediately after becoming a Reporting Insider (as defined in applicable securities laws), and immediately following the purchase or sale of securities of the Company, a Reporting Insider must complete all Insider reports required by applicable securities laws within the prescribed time periods. The General Counsel of the Company will provide guidance and inform those individuals he or she believes are Reporting Insiders. However, the Company is not responsible for alerting Reporting Insiders of their obligations or for filing Insider trading reports.

SECTION 16 SHORT SWING TRADING RULES

Section 16(b) of the Exchange Act prevents certain Reporting Insiders from realizing any "short-swing profit" in Company securities. Any profit realized by a Reporting Insider on a purchase and sale or sale and purchase of equity securities of the Company within any six-month period belongs to and is recoverable by the Company, and any stockholder may bring an action for collection on behalf of the Company. Your transactions will be matched so that the greatest profit may be recovered. Reporting Insiders should carefully review with their legal advisor any proposed transaction to ensure that it will not result in their "profit" being disgorged to the Company. As a foreign private issuer, the Company is currently exempt from the reporting and short-swing profit recovery requirements of Section 16 of the Exchange Act; however, this exemption may be lost if the Company ceases to qualify as a foreign private issuer.

RULE 144 REQUIREMENTS

All Company securities sold by or on behalf of Company Personnel in the public market must be sold in accordance with the technical requirements of Rule 144, including the filing of a Form 144 with the SEC prior to or concurrently with the trade, even if the securities were purchased in the open market. A knowledgeable broker can assist you with the necessary paperwork. Please provide advance notice of a proposed sale to the Company's General Counsel in order to expedite the process, resolve any issues and avoid any Rule 144 violations. Please note that special considerations apply to the preparation and filing of Forms 144 that relate to sales pursuant to Pre-Approved Trading Plans.

COMPLIANCE

Your actions with respect to matters governed by this Policy are significant indications of your judgment, ethics, and competence. Any actions in violation of this Policy may be grounds for disciplinary action, up

to and including immediate dismissal. A violation of this Policy may also violate certain securities laws, corporate laws and/or criminal laws. If it appears that a director, officer or employee may have violated such laws, the Company may refer the matter to the appropriate regulatory authorities, which could lead to penalties, fines or imprisonment.

Under U.S. federal securities laws, individuals who trade on or tip Material Non-public Information are subject to civil penalties of up to three times the profit gained or loss avoided and criminal penalties of up to \$5,000,000 in fines and up to 20 years imprisonment. If the Company fails to take appropriate steps to prevent insider trading, the Company and its directors, officers and other supervisory personnel may be subject to “controlling person” liability and potential civil and criminal penalties.

Canadian securities laws also impose substantial penalties, regulatory sanctions and civil liability for any breach of those prohibitions, namely, depending on the violation: (a) fines of up to \$5,000,000 and three times the profit made or loss avoided; (b) prison sentences for a term not exceeding five years for tipping or recommending (10 years for insider trading under the Criminal Code); (c) civil liability for compensation to the seller or purchaser of the relevant securities for damages as a result of the trade; and (d) public interest orders such as trading bans and bans against acting as a director or officer of a public issuer and acting as or becoming a registrant. Where a company is found to have committed an offence, the directors, officers and supervisory personnel of the company may be subject to the same or additional consequences.

APPENDIX A – SAMPLE FORM OF REQUEST FOR PRE-CLEARANCE

TO: General Counsel

General Fusion Group Ltd. (the “Company”)

RE: Request for pre-clearance to trade in securities of the Company

The undersigned hereby requests, pursuant to the Company’s Insider Trading Policy (the “**Policy**”), pre-clearance to engage in the transaction involving securities of the Company described below.

The undersigned understands and acknowledges that receipt of pre-clearance of the trade described below does not necessarily mean that the undersigned is not in possession of material non-public information, and the undersigned is ultimately responsible for complying with the Policy and applicable securities laws.

Name of Individual Requesting Pre-Clearance:

Position with the Company:

Number and Type of Securities Proposed to be Traded:

Nature of Proposed Transaction (i.e. purchase or sale, privately or on public market):

Date(s) of Proposed Transaction:

DATED this ____ day of _____, 20__.

Signature of Individual Requesting Pre-Clearance

APPENDIX B

“Contractors” means independent contractors (who are engaged in an employee-like capacity) of the Company or any of its subsidiaries;

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

“Employees” means full-time, part-time, contract or secondment employees of the Company or any of its subsidiaries;

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

Approved: July 10, 2026.