

CORPORATE DISCLOSURE POLICY

Purpose of this policy:

To promote consistent, reliable disclosure or timely broad dissemination of material information to the market consistent with security regulators, stock market listing guidelines and sound corporate governance.

- The decision of whether information is material is made based on whether the information significantly affects the market price or value of the securities or would be reasonable expected to have a significant effect on the market value of the securities. Further, the information is judged as to whether a reasonable investor would desire to have the information prior to making an investment decision. The decision on what information is material is not made by senior management alone; but is also based on the relative importance to the project of the Company, discussion with project personnel and staff.
- 2. Analysts reports are generally not reviewed; however, information provided on the general industry or metal markets may be discussed from relevant analysts' reports.
- 3. Earnings dissemination is made in concert with materiality test and generally disseminated to shareholders with the quarterly reports. Dissemination is made in compliance with the national instruments and other regulations. Private analyst meetings and calls are permitted under the Company's corporate disclosure policy; however, any material information must be released with a properly disseminated news release. If an analyst raises a question that points out a gap in the material information disclosure, a follow-up news release is considered prior to this item being discussed with the analyst. Analysts are permitted to visit the Company's project and properties with reasonable notice; however, project staff is advised as to the confidential nature of certain work in progress prior to their compilation for news release.
- 4. Meetings with investors and media occur as part of the normal course of business. All meetings and discussions are in compliance with securities regulations and no material information is provided to investors or the media prior to dissemination with a news release.
- 5. Presentations at industry conferences only include information disseminated by news releases and presentations presented at conferences are generally available, in a timely fashion, on the Company's website.
- 6. New releases are forwarded by electronic media to shareholders' lists. The corporate website contains information provided in the news releases and public presentations generated from the news releases and Company reports. The Company website contains information and maps derived from the corporate information, with proper reference to the NI 43-101 property report on SEDAR.

- 7. Forecasts and other forward-looking information are provided with prudent cautionary language and a general description of the risks and opportunities for material differences from the information provided in the forward-looking statements and actual events is provided at the outset of all corporate presentations, website materials and news releases.
- 8. Discussions, briefings and meetings with analysts, institutional investors and other market professionals are completed in compliance with the securities regulations and good corporate governance. On the rare occasion where potentially material non-public information regarding possible future transactions is discussed with investment bankers, institutional investors or analysts (if "brought over the wall") the confidential nature of such discussions is to be confirmed, and a request to acknowledge that such discussions are confidential and potentially material is also to be confirmed. The confirmation is to be done in such a way that prevents the unintentional discussion of potential material information and to provide the Company with an assurance that securities regulations are to be respected.
- 9. Unintentional selective disclosure is minimized by the authorization of the limited number of people who are authored to speak on behalf of the Company to analysts, media and investors. These spokespersons are members of senior management and are knowledgeable of the disclosure policy and potential materiality of the undisclosed information. If an unintentional selective disclosure occurs this disclosure will be judged for its potential materiality and if material, a news release shall be distributed. If the unintentional selective disclosure is significant and may have had a market impact, a halt in trading the securities may be requested and the regulatory authorities will be notified.
- 10. A general policy of not responding to market rumors, posting on billboards or other discussion forums is to be maintained. All staff is made aware as part of the hiring and at regular staff meetings that billboards and other discussion forums are to be avoided.
- 11. Senior management and other project staff are restricted from trading while material information is being compiled for dissemination or prior to the disclosure of any pending material event. Compliance with the securities rules is discussed with all employees and contractors prior to their employment or engagement with the Company.
- 12. As discussed in item 11., quiet periods are invoked during the compilation and completion of any transactions or results that could result in a material event for disclosure. Insiders, employees and contractors are forbidden from making purchases or sales in the Company's securities while in possession of material non-public information. Efforts are made to maintain the website updated and accurate. Outdated and historical information is archived.
- 13. The board of directors and the audit committee of West Vault Mining Inc. are required to review and approve earnings guidance and any news releases containing financial information based on the financial statements prior to the release of such information.

Implemented on December 9, 2010; Revised on June 25, 2020; Ratified on July 19, 2023.