

BRAGG GAMING GROUP INC. DISCLOSURE POLICY

April 2026

1. PURPOSE

The Board of Directors (the "**Board**") of Bragg Gaming Group Inc. (the "**Company**") has adopted this Disclosure Policy (this "**Policy**") in order to ensure that communications to the public regarding the Company are timely, factual, accurate, complete, broadly disseminated and, where necessary, filed with regulators in accordance with applicable securities laws. The goal of this Policy is to ensure a consistent approach to disclosure practices throughout the Company.

This Policy applies to all directors, officers, employees and consultants of the Company or any of its subsidiaries (collectively, "**Company Personnel**"). It covers disclosure documents filed with, or delivered to, the Canadian and U.S. securities regulatory authorities and written statements made in the Company's annual and quarterly reports, press releases, letters to shareholders, presentations by senior management and information contained on the Company's website and in other electronic communications. This Policy applies to oral statements made in group and individual meetings and telephone conversations or electronic communications with members of the investment community (which includes analysts, investors, investment dealers, brokers, investment advisers and investment managers) and interviews with the media, as well as speeches, industry conferences, news conferences and conference calls and dealings with the public generally.

This Policy shall be reviewed periodically by the Nomination and Governance Committee of the Board. Any amendments to this Policy shall be subject to approval by the Board

2. DISCLOSURE COMMITTEE

Composition

The Company's Disclosure Committee (the "**Disclosure Committee**") consists of the Company's **Chief Executive Officer, the Chief Financial Officer, and the Chief Legal and Compliance Officer**, or such other officers as may be designated by the Board. Upon consensus of the Disclosure Committee, members may be added to or removed from the Disclosure Committee, provided that the Chair of the Board is notified as soon as practicable after any such decision is made

General Responsibilities

Subject to (a) applicable laws, (b) periodic disclosure matters (such as quarterly results), and (c) any development determined by the Board as requiring immediate public disclosure, the Disclosure Committee shall be responsible for overseeing that reasonable monitoring of the Company's information and developments is conducted, on an ongoing basis, for disclosure purposes (with the results of such investigation being reported to the Disclosure Committee), assessing such information and developments for materiality and determining if and when such material information (as defined herein) requires public disclosure.

Meeting of the Disclosure Committee

The Disclosure Committee shall meet as circumstances dictate. In the event that less than all members of the Disclosure Committee are available, provided that a majority of the members are available, the decision of the available members shall be sufficient. If consensus on any matter cannot be reached at a meeting of the Disclosure Committee, the matter will be referred to the Board for discussion.

Review of Public Disclosure

Prior to disclosure, the Disclosure Committee shall review the text of public oral statements and documents that contain material information or that will be filed with the securities regulatory authorities or with a government or an agency of a government under applicable securities or corporate laws or with any stock exchange or marketplace pursuant to such exchange's or marketplace's rules or regulations ("**Stock Exchange Requirements**") in order to ensure that the statement or document, as the case may be, does not contain a "misrepresentation" ("misrepresentation" has the meaning given

under applicable Canadian securities laws) or a material misstatement or material omission under applicable United States securities laws. Such review shall be in addition to, and not in lieu of, the review of such statements or documents by the Board, as applicable, and other Company Personnel otherwise responsible for the matters discussed in such statements or documents and/or the review of such statements or documents.

Review of Disclosure Compliance

The Disclosure Committee shall meet with all officers and any senior operational employees as the Disclosure Committee may deem appropriate periodically as the Disclosure Committee may deem appropriate to review and discuss, as applicable, the Company's information and developments, the Company's disclosure compliance system and this Policy (including the effectiveness and compliance therewith). Such meetings shall be in addition to, and not in lieu of, any meetings between the Board or the Audit Committee, and such officers and employees.

3. AUDIT COMMITTEE

The Audit Committee is responsible for reviewing financial disclosure in periodic reports, a prospectus or other securities offering document of the Company, as well as press releases disclosing, or based upon, financial results of the Company and any other publicly disseminated material financial disclosure, including financial guidance and any material financial measures that do not have a standardized meaning under the generally accepted accounting principles ("GAAP") used in the Company's financial statements ("non-GAAP financial measures"), non-GAAP ratios, total of segments measures, capital management measures, and supplementary financial measures (each as defined in National Instrument 52-112 – Non-GAAP and Other Financial Measures Disclosure and the equivalent terms and concepts in Regulation G of the Securities Exchange Act of 1934, as amended ("**Exchange Act**"). The Disclosure Committee shall be responsible for ensuring that the Audit Committee is provided with the text of public oral statements and documents that contain disclosures requiring review by the Audit Committee.

4. MATERIAL INFORMATION

Material information includes a material change and a material fact.

A material change is defined under Canadian securities laws as (i) any change in the business, operations or capital of the Company that would reasonably be expected to result in a significant change in the market price or value of the Company's securities, or (ii) a decision to implement such a change made by the Board or other persons acting in a similar capacity or by senior management of the Company who believe that confirmation of the decision by the Board or such other persons acting in a similar capacity is probable.

A material fact is any fact that would reasonably be expected to have a significant effect on the market price or value of the Company's securities. Information is also likely to be "material" if it would reasonably be expected to have a significant influence on a reasonable investor's decision to buy, hold or sell the Company's securities. The determination of what is a material fact will be made in accordance with the definition afforded to such term, or similar term, under all applicable laws, rules and/or regulations.

Either positive or negative information may be material. The Disclosure Committee, when assessing the materiality of information shall include consideration of the proximity, probability and significance of the information in the context of the total information generally available about the Company.

As a general rule, there is no requirement to interpret and disclose the impact of external political, economic or social developments on the affairs of the Company. However, if an external development will have, or has had, a direct effect on the business and affairs of the Company that (a) is both material and uncharacteristic of the effect generally experienced by other companies engaged in the same business or industry as the Company, or (b) is material and which holders of the Company's securities would otherwise be unable to be aware, the information should be regarded as being material.

5. INTERNAL REPORTING BY COMPANY PERSONNEL

Becoming Aware of Material Information

It is essential that the Disclosure Committee be kept fully apprised of all pending Company information and developments that are or may be material in order for the Disclosure Committee to evaluate those events and to determine whether disclosure is necessary or appropriate and, if so, the timing for public release of such information. Accordingly, any person to which this Policy applies who becomes aware of material information about the Company must immediately disclose that information to a member of the Disclosure Committee.

If any person to whom this Policy applies is unsure at any time as to whether they are in possession of material information about the Company, they should contact the Chief Legal and Compliance Officer or, if the Chief Legal and Compliance Officer is unavailable, the Chief Financial Officer, for clarification.

Becoming Aware of a Misrepresentation

If Company Personnel becomes aware that (a) any information publicly disclosed by the Company contained or may have contained a misrepresentation or material omission, or (b) there has been or may have been a failure to make timely disclosure of material information, the Disclosure Committee should be promptly notified and the Disclosure Committee, after conducting a reasonable investigation of the information, shall endeavour to ensure that the material information, or correction thereof, as the case may be, is promptly disclosed in accordance with applicable laws and Stock Exchange Requirements.

6. COMPANY SPOKESPERSONS

The Chief Executive Officer and the Chief Financial Officer are hereby designated as the primary Company spokespersons (the "**Spokespersons**"). Others within the Company or the Company's consultants or advisors may be designated by the Disclosure Committee to respond to, or assist in responding to, specific inquiries as necessary or appropriate. Subject to any specific decision by the Disclosure Committee, the Spokespersons are hereby designated to respond to media inquiries and investor relations questions or inquiries.

7. RESTRICTIONS ON DISCLOSURE BY COMPANY PERSONNEL

Disclosure by or on behalf of Company

Only Company Spokespersons are authorized to have substantive discussions about any aspect of the Company's business with the media, analysts or any other member of the investment community, any shareholder or potential investor, or at any industry or other conference. Employees who are not authorized Spokespersons must not respond under any circumstances to inquiries from the investment community or the media, or from other parties if received outside the scope of the employee's usual responsibilities, unless specifically asked to do so by an authorized Spokesperson. Any such request for information about the Company should in all cases be directed promptly to a Spokesperson.

Prohibition Against Tipping

Company Personnel should also be aware of the prohibition on "tipping", as contained in the Company's Insider Trading Policy (as amended from time to time).

Protection of Confidential Information

All Company Personnel should take appropriate steps to safeguard confidential information. Confidential information includes trade secrets, know-how, records, data, plans, strategies, processes, business opportunities and ideas relating to present and contemplated operations, activities, products, services and financial affairs of the Company, its customers, its suppliers and/or other employees.

Confidential information is information which is not generally known to the public and is useful or helpful to the Company and/or would be useful or helpful to competitors of the Company. Common examples include, but are not limited to, such things as marketing plans, new business ideas, financial data, supplier lists, customer lists, capital investment plans, projected sales or earnings, or operating methods.

Confidential information also includes any documents containing any of the foregoing or which may be labelled as “confidential”, “proprietary”, or other similar term.

The following procedures, which are not exhaustive, should be observed by Company Personnel at all times:

- Storage of documents and files containing confidential information in a safe place to which access is restricted to individuals who need to know that information in the necessary course of business.
- Avoiding discussions of confidential matters in places in which the discussion may be overheard, such as elevators, hallways, restaurants, airplanes or taxis.
- Avoiding discussions of confidential matters on cellphones or other wireless devices. If confidential matters must, of necessity or urgency, be discussed on cellphones or other wireless devices, caution should be exercised by the participants, and, in such cases, the Company name and the identity of any relevant party should be cryptic or in code.
- Avoiding reading of confidential documents on cellphones, tablets or other personal electronic devices in public places.
- Accompanying visitors and ensuring that they are not left alone in offices containing confidential information.
- Transmission of documents by electronic means only where it is reasonable to believe that the transmission can be received under secure conditions by the intended recipient.
- Restricting access to confidential electronic data through the use of passwords.
- Confidential documents and storage devices should not be discarded where others can retrieve them.

Remote Work Protections

Protecting confidentiality in a remote work environment is equally important. If working from home, Company Personnel must:

- Be careful not to leave important files or confidential documents on a table or otherwise out in the open in a shared household.
- Keep discussions private when confidential information is discussed, which means taking calls and conducting virtual meetings away from other people at home.
- Ensure that laptop computers, tablets and cellphones that store confidential information or from which it can be accessed are password protected and are not left exposed or unattended in a shared household when they are unlocked, so that others, including family members, will not have access.
- Not allow others, including family members, to use laptop computers, tablets and smart phones that are used for work and which store confidential information or from which it can be accessed.

8. DISSEMINATION PROCEDURES

Prior to Disclosure of Material Information

During the period before material information is disclosed, market activity in the Company's listed or quoted securities should be monitored, and the Market Surveillance Department of the Canadian Investment Regulatory Organization (“**TSX Market Surveillance**”), and Nasdaq MarketWatch Department (“**Nasdaq Market Surveillance**” and together with TSX Market Surveillance, “**Market Surveillance**”), or equivalent regulators, should be promptly advised of any unusual market activity.

Determination to Disclose Material Information

Once the Disclosure Committee determines that a development or information is material information, then such material information shall be disseminated by press release in a manner designed to provide broad, non-exclusionary distribution of the information to the public, unless the Company is permitted to keep the information confidential, as provided below. Such disclosure shall be provided publicly forthwith upon the information becoming known to the Company, or in the case of information previously known, forthwith upon it becoming apparent to the Company that the information is material.

The Disclosure Committee shall also determine whether the material information constitutes a "material change", pursuant to applicable securities legislation, and if so, the Company shall file or furnish, as applicable, a "material change report" and any other required filings with relevant securities commissions as soon as practicable, and in any event within 10 days of the material change. The analysis as to whether or not to make such disclosure, and whether such information constitutes a material change, would typically involve consultation with legal counsel.

Determination to Keep Material Information Confidential

If the Disclosure Committee determines, on a reasonable basis (typically in consultation with legal counsel), that immediate disclosure of material information would be unduly detrimental to the interests of the Company and therefore may, in accordance with applicable laws and Stock Exchange Requirements, be kept confidential, the Disclosure Committee shall also determine the manner of safeguarding such information and decide when that information should be disclosed in accordance with this Policy.

If the Disclosure Committee determines that the undisclosed material information constitutes a "material change", it shall also cause a draft material change report to be circulated to the Board with a recommendation that it be filed on a confidential basis and, upon Board approval, cause the confidential material change report to be filed with the applicable securities regulatory authorities. The Disclosure Committee shall periodically (at least every 10 days) review its decision to maintain the confidentiality of the material information and, in the case of an undisclosed material change, shall advise the applicable securities regulatory authorities where it believes the report should continue to remain confidential. If the basis for confidentiality ceases to exist, the Disclosure Committee shall ensure that the material information is promptly disclosed in accordance with applicable laws.

Pending the public release of material information, the Company should also satisfy itself that persons who have knowledge of the material information are aware that it has not been generally disclosed and remains confidential and that such persons are subject to the requirements of applicable securities laws relating to such persons trading (or recommending or encouraging any other person to trade) securities with knowledge of material non-public information concerning the Company and such persons informing another person or company of such material non-public information.

Contents of Press Releases

Press releases issued in respect of material information shall contain sufficient detail (including, where appropriate, clear citations of material third party information) to enable the media and investors to understand the substance and importance of such information while avoiding exaggerated reports or promotional commentary. Unfavourable material information must be disclosed as promptly and completely as favourable material information.

Legal counsel should be consulted prior to disseminating any news release (a) containing non-GAAP financial measures, non-GAAP ratios, total of segments measures, capital management measures, and supplementary financial measures, (b) containing forward-looking information, or (c) relating to an offering of securities (particularly into the United States).

Dissemination of Press Releases

Press releases containing material information will be broadly disseminated through an approved newswire service. These press releases shall be transmitted to all stock exchanges on which the Company's securities are listed and relevant regulatory bodies in accordance with the relevant rules including, in particular, on SEDAR+, EDGAR, as well as business wires, national financial media and local media in areas where the Company has its headquarters and operations, all as considered appropriate from time to time by the Disclosure Committee or the Board. Such press releases shall also be posted on the Company's website as soon as practical after release over the newswire. Disclosure on the Company's website alone does not constitute adequate disclosure of undisclosed material information.

If the Toronto Stock Exchange ("TSX"), the Nasdaq Stock Market LLC ("Nasdaq") or any other marketplace upon which securities of the Company are traded is open for trading at the time of a proposed announcement of material information, the proposed press release must be pre-filed with

Market Surveillance through such permitted means as designated by Market Surveillance (i.e., through the portals <https://powerportal.ciro.ca/en-US/News-Release-Vetting-Request/> in Canada and <https://www.nasdaq.net/ed/issuerentry.aspx> in the United States). Market Surveillance must also be advised of the proposed timing and method of dissemination of the press release.

If neither the TSX, the Nasdaq nor any other marketplace upon which the securities of the Company are traded is open for trading at the time of a proposed announcement of material information, Market Surveillance staff should be advised before trading opens on the next trading day and a copy of the press release must be provided to Market Surveillance through such permitted means as designated by Market Surveillance.

Inadvertent or Unauthorized Disclosure

If previously undisclosed material information has been inadvertently disclosed to any person outside the Company that is not bound by an express confidentiality obligation or disclosed on some other unauthorized basis, the Company shall cause such information to be publicly disclosed as soon as possible after learning of the inadvertent or unauthorized disclosure. In such circumstances, the Company shall take immediate steps to ensure that disclosure is broadly disseminated via press release.

Pending the public release of the information, the Company shall inform the person who has knowledge of the information that the information is material and has not been generally disclosed. The Company shall assess whether a trading halt of the Company's securities on the applicable stock exchange and/or marketplace on which it is listed or quoted should be requested until proper disclosure has been made.

9. CONFERENCE CALLS

Conference calls or press conferences (each referred to herein as a “**conference call**” or “**call**”) shall be held for quarterly and annual financial results, or, if authorized by the Disclosure Committee, for material corporate developments. During these calls, one or more of the Company Spokespersons or other appropriate personnel as designated by the Disclosure Committee, shall discuss key aspects of the results or developments, as the case may be, and this discussion shall be accessible simultaneously to all interested parties, some as participants by telephone and others in a listen-only mode by via telephone or, if available, via a webcast or other electronic communication facility. Where practicable, conference calls shall be scripted, with the script reviewed for accuracy and approved by the Disclosure Committee prior to the call, and the Disclosure Committee and the Company Spokespersons shall meet to discuss appropriate answers to anticipated questions in advance of any such conference call.

The Company shall provide advance notice of any conference call and webcast that may contain material information by broadly issuing a press release announcing the date, time and subject matter of the call, providing information allowing interested parties to access the call and webcast, and noting the applicable Broadcast Period (as defined below). In addition, the Company may invite members of the investment community, the media and others to participate. Such notice will also be posted on the Company's website.

Any supplemental information provided to participants shall also be posted to the Company's website for others to view. An archived audio webcast on the Company's website, or an audio transcript of the conference call, shall be made available following the call for a minimum of 30 days (the “**Broadcast Period**”) for anyone interested in listening to a replay and shall be retained for a minimum of six years in the Company's records. The archived audio webcast page of the Company's website shall include a notice that advises the reader that the information therein is for historical purposes only and that while information contained within the releases was believed to be accurate at the time of issue, the Company will not, and specifically disclaims any duty to, update this information.

10. RESPONDING TO MARKET RUMOURS

The Company's policy is to not comment, affirmatively or negatively, on rumours. The Company's Spokespersons may respond to rumours by consistently stating: “It is our policy not to comment on market rumours or speculation.”

Should any stock exchange or marketplace on which the Company's securities are listed request that the Company make a definitive statement in response to a market rumour that may be causing significant volatility in the Company's listed securities, the Disclosure Committee (typically in consultation with legal counsel) shall consider the matter and decide whether to make a statement regarding the rumour.

11. FORWARD-LOOKING INFORMATION AND FORWARD-LOOKING STATEMENTS

Subject to authorization from the Disclosure Committee, the Company may elect to discuss material forward-looking information and forward-looking statements as such terms are defined under applicable laws (together, "**forward-looking information**"), in disclosure documents filed by the Company, materials provided to securityholders, securities regulatory authorities or stock exchanges or marketplaces, press releases, conference calls or presentations, or materials posted to the Company's website, social media channels or through other electronic communications. If material, this information must be broadly disseminated in accordance with this Policy.

Dissemination of any material financial outlook (e.g., earnings guidance) or forward-oriented financial information (e.g., forecasted financial statements) must also be authorized by the Audit Committee.

The Company will endeavour to ensure that there is a reasonable basis for drawing any conclusions or making any forecasts or projections set out in the forward-looking information.

Documents (including electronic materials) containing material forward-looking information shall contain, proximate to the forward-looking information, reasonable cautionary language (a) identifying the forward-looking information as such, (b) identifying the material risk factors that could cause actual results to differ materially from the forward-looking information, (c) stating the material factors or assumptions used to develop the forward-looking information, (d) advising that actual results may vary from the forward-looking information, and (e) describing the Company's policy for updating forward-looking information.

For public oral statements (including earnings calls), the person making such a statement (or someone on their behalf) shall state that (a) the oral statement contains forward-looking information, (b) the actual results could differ materially from any conclusion, forecast or projections in the forward-looking information, (c) certain material factors or assumptions were applied in drawing such conclusion or making such forecast or projection, and (d) additional information is contained in a readily-available document (and the person making this statement shall confirm that such document has been previously filed with applicable securities regulatory authorities or generally disclosed and shall identify such document) regarding the material factors or other risks that could cause actual results to differ materially from any conclusion, forecast or projections in the forward-looking information and the material factors and assumptions that were applied in drawing such conclusion or making such forecast or projection.

12. SPECIFIED FINANCIAL MEASURES

The disclosure of non-GAAP financial measures, non-GAAP ratios, total of segments measures, capital management measures, or supplementary financial measures risks misleading investors if such measures are not accompanied by appropriate disclosure. Accordingly, the Company shall comply with National Instrument 52-112 – *Non-GAAP and Other Financial Measures Disclosure* and Regulation G of the Exchange Act.

13. EXPERT DISCLOSURE

Prior to any public statement or disclosure or a filing with a securities regulatory authority by the Company or by a person on behalf of the Company that includes, summarizes or quotes from a report, statement or opinion made by an "expert" (as that term is understood pursuant to applicable securities laws) and unless the Disclosure Committee determines otherwise, the Company shall, consistent with applicable laws, obtain the written consent of such expert to such statement, disclosure or filing (which has not been withdrawn in writing by the expert prior to the Company's disclosure or filing) and the Disclosure Committee shall make reasonable efforts to determine that the Company or the relevant person does not know and has no reasonable grounds to believe that there is a misrepresentation in

the applicable statement, disclosure or filing made on the authority of the expert and to determine that the statement, disclosure or filing fairly represents the report, statement or opinion made by the expert.

14. QUIET PERIODS

In order to avoid any potential for, or the perception or appearance of selective disclosure, the Company observes a quarterly "quiet period". The quiet period commences ten business days before the end of each fiscal quarter and ends on the second business day after the issuance of a news release disclosing quarterly or annual results for that fiscal period.

During the quiet period, Spokespersons (a) will exercise extreme caution to avoid selective disclosure of any material non-public information concerning the Company (which includes information concerning the recently completed or current fiscal period) and (b) will not initiate any such discussions or communications, unless so authorized by the Disclosure Committee or the Board. Accordingly, Spokespersons will be limited to responding to inquiries about publicly available or non-material information concerning the Company when communicating with analysts, investors or the media.

Any press release to be issued by the Company during the quiet period should be reviewed and authorized by the Disclosure Committee, unless such release has been separately reviewed and authorized by the Board. During the quiet period, any public speaking engagements (e.g., appearances at conferences), by Company Personnel shall be restricted and shall require the prior approval of the Disclosure Committee.

15. CONTACT WITH ANALYSTS, INVESTORS AND THE MEDIA

The Company recognizes that meetings with analysts, significant investors and media outlets are an important element of the Company's investor relations program. However, disclosure in such individual or group meetings does not constitute adequate disclosure of information that is considered material non-public information. Any such disclosure must be preceded by a press release disseminated, or conference call held, in accordance with this Policy.

In meetings with analysts, significant investors and media outlets, Company Personnel shall provide only non-material information through individual and group meetings, in addition to regular publicly disclosed information. Company Personnel cannot alter the materiality of information by breaking down the information into smaller, non-material components. If previously undisclosed material information is disclosed in a conversation with an analyst, investor or the media, the Company shall immediately disclose such information broadly via a press release, in accordance with this Policy.

If it is uncovered that a material misstatement or material omission was made in such a meeting, the Disclosure Committee shall consider and, if deemed advisable, authorize release of an appropriate statement or other disclosure correcting such misstatement or omission.

16. REVIEWING AND DISTRIBUTING ANALYST REPORTS

It is the Company's policy to review, upon request and without preference, analysts' draft research reports or models. Any such review must be limited to (a) referring to publicly available factual information that may affect the analyst's report or model and (b) pointing out inaccuracies or omissions with reference to publicly available information about the Company.

In order to avoid any appearance of endorsement, Company Personnel (a) shall not confirm, or attempt to influence, an analyst's opinions or conclusions, (b) shall not express comfort with the analyst's report, model or earnings estimates, (c) shall only provide its comments verbally, and (d) shall comment only on draft research reports, not final reports.

Analyst reports are proprietary products of the analyst's firm. Distributing analyst reports, or providing website, email or social media links to them, may be viewed as an endorsement of the reports by the Company. For these reasons, Company Personnel will not circulate such reports through any means to persons outside of the Company.

17. RESPONSIBILITY FOR ELECTRONIC COMMUNICATIONS

This Policy also applies to electronic communications, including through social media, the Company's website and e-mail. Accordingly, officers and employees responsible for written and oral public disclosures, including Spokespersons, shall also be responsible for electronic communications.

Social Media

To prevent inadvertent disclosure of undisclosed material information, Company Personnel are strictly prohibited from posting information to or otherwise participating in Internet blogs, chat rooms or similar social media forums on matters pertaining to the Company's business and affairs or its listed securities unless authorized to do so by a Spokesperson.

Company Website

The **Chief Financial Officer** is responsible for updating the investors section of the Company's website and is responsible for monitoring all Company information placed on the Company's website to ensure that it is accurate and complete and, if material, has been previously broadly disseminated in accordance with this Policy.

Investor relations material shall be contained within a separate section of the Company's website and shall include a notice that advises the reader that the information posted was believed to be accurate at the time of posting, but that (a) the Company will not, and specifically disclaims any duty to, update the information and (b) the information may be superseded by subsequent disclosures. Such investor relations material shall include, or shall include links to, all of the Company's "timely disclosure" documents issued and filed in accordance with applicable securities laws, any material that the Company has distributed to analysts and institutional investors and any other information deemed appropriate by the **Chief Financial Officer**.

All information posted to the website, including text and audiovisual material, shall show the date such information was posted. The minimum retention period for material corporate information on the website shall be two years after the date of its posting.

Links from the Company's website to a third party website must be approved by the **Chief Financial Officer**. Any such links should include a notice that advises the reader that they are leaving the Company's website and that the Company is not responsible for the contents of the other site. The Company's website shall contain contact information for investor relations inquiries.

18. Education and Enforcement

The Disclosure Committee shall ensure that this Policy is circulated to all Company Personnel. This Policy shall be posted on the Company's internal website and the Disclosure Committee shall endeavour to ensure that all Company Personnel are aware of the existence of this Policy, its importance and the Company's expectation that Company Personnel shall comply with this Policy.

It is a condition of their appointment or employment that Company Personnel at all times abide by the standards, requirements and procedures set out in this Policy unless a written authorization to proceed otherwise is received from the Disclosure Committee. Any director, officer, employee, or consultant who violates this Policy may face disciplinary action up to and including termination of their employment or appointment with the Company for cause, without notice. The violation of this Policy may also violate certain securities laws, corporate law and/or criminal laws. If it appears that a director, officer, employee, or consultant 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.

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Should any person subject to this Policy have any questions or wish to receive information concerning the above, please contact the Chief Legal and Compliance Officer.

This Policy is intended as a component of the flexible governance framework within which the Company's Board, assisted by its committees, supervises the management of the business and affairs

of the Company. While it should be interpreted in the context of all applicable laws, regulations and listing requirements, as well as in the context of the Company's Articles and By-Laws, it is not intended to establish any legally binding obligations.