

# VINLAND LITHIUM INC.

## ETHICAL WORKPLACE AND REPORTING POLICY AND PROCEDURE

EFFECTIVE July 21, 2025

### 1. PURPOSE

Vinland Lithium Inc. ("**Vinland**") has adopted certain policies, including a Code of Business Conduct and Ethics, which requires the observance of high standards of business and personal ethics in the conduct of all directors, officers and other employees of Vinland. The Audit Committee of the Board of Directors (the "**Board**") of Vinland has developed, and the Board has approved, this Ethical Workplace and Reporting Policy and Procedure (this "**Policy**") to handle complaints, reports and concerns by any individual regarding (a) questionable accounting practices, inadequate internal accounting controls or coercion relating to auditing matters; (b) actual or potential violations of any applicable law; and (c) other suspected wrongdoing, including conduct prohibited under the Code of Business Conduct and Ethics of Vinland (each a "**violation**").

### 2. REPORTING RESPONSIBILITY

It is the responsibility of all directors, officers and other employees to report violations or suspected violations in accordance with this Policy.

### 3. NO RETALIATION

No director, officer or other employee who, in good faith, reports or files a complaint concerning a violation or suspected violation shall suffer harassment, retaliation or any adverse employment consequence as a consequence of making such report or filing such complaint. Any individual who retaliates against another individual who has reported a violation or suspected violation in good faith is subject to discipline, up to and including termination of employment according to applicable law, as it will be considered as a specific lack of probity and honesty, disobedience and/or harassment.

### 4. ACTING IN GOOD FAITH

Any individual who reports or files a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove to have been made maliciously or in bad faith, or were knowingly false will be viewed as a serious disciplinary offense and any individual who reports or files a complaint on such a basis will be subject to discipline, up to and including termination of employment according to applicable law, as it will be considered as a specific lack of probity and honesty, disobedience, bullying and/or harassment.