



**SNOWLINE GOLD CORP.**

## **CORPORATE DISCLOSURE POLICY**

### **1. Objective and Scope**

This Corporate Disclosure Policy (“**Policy**”) of Snowline Gold Corp. (the “**Company**”) covers disclosure to the investment community, the press, industry consultants and other audiences. The purpose of this Policy is to govern the disclosure of material, non-public information in a manner designed to provide broad, non-exclusionary distribution of information so that the public has equal access to the information. This Policy aims to:

- (a) reinforce the Company’s commitment to comply with continuous disclosure obligations as required under applicable Canadian securities laws and regulations and the policies of the stock exchange on which the Company is listed;
- (b) ensure that all communications to the investing public about the business and affairs of the Company are:
  - (i) informative, timely, factual, balanced and accurate; and
  - (ii) broadly disseminated in accordance with all applicable legal and regulatory requirements;
- (c) ensure the Company prevents the selective disclosure of material information (as defined herein) to analysts, institutional investors, market professionals and others; and
- (d) ensure all persons to whom this Policy applies understand their obligations to preserve the confidentiality of undisclosed material information.

It is important for Responsible Persons (as defined herein) to understand that any statement made by the Company or a company spokesperson, whether contained in a formal regulatory filing or an informal communication, may be subject to applicable securities laws. This means that if a statement is found to be misleading, the Company, as well as the persons involved in making the misleading statement, may be subject to an enforcement action by the securities regulatory authorities and/or a civil action. Statements, whether oral or written, can violate securities laws by being either untrue or misleading, including being misleading as a result of omitted information. Statements made by an employee who is not formally designated as a company spokesperson may nonetheless be viewed as made on behalf of the Company. Therefore, unless specifically designated by the Chief Executive Officer (“CEO”), only the CEO is authorized to communicate with the media, financial

community, investors and shareholders on behalf of the Company. All Responsible Persons should familiarize themselves, and take great care to comply with, this Policy.

This Policy shall be reviewed periodically by the Compensation, Nominating and Governance Committee. Any amendments to this Policy shall be subject to approval by the Board of Directors of the Company (the “**Board**”).

## **2. Application of this Policy**

This Policy extends to all employees, officers and directors of the Company, and those authorized to speak on its behalf, which includes consultants where appropriate (each, a “**Responsible Person**”). It is the responsibility of all Responsible Persons to understand and comply with this Policy. Upon receipt of this Policy, each Responsible Person is required to complete the certificate attached as Schedule “A” to this Policy.

This Policy applies to all disclosures made in documents filed with stock exchanges, the securities regulatory authorities, written statements included in the Company’s financial and non-financial disclosure, including management’s discussion and analysis, and written statements made in the Company’s annual and quarterly reports, news releases (unreleased as well), letters to shareholders, presentations by senior management and information contained on the Company’s website and other electronic communications. It extends to all oral statements made in meetings and telephone conversations with analysts, investors and shareholders, interviews with the media as well as presentations, speeches, press conferences, conference calls and webcasts and all other communications to stakeholders (“**Disclosure Statements**”).

For greater certainty, an “employee” of the Company includes all permanent, contracted, seconded and temporary agency employees who are on assignments with the Company.

## **3. Communication of this Policy**

A copy of this Policy will be distributed from time to time to all Responsible Persons to ensure they are all aware of this Policy. As well, this Policy will be posted on the Company’s website. All Responsible Persons will be informed whenever significant changes are made to this Policy. New Responsible Persons will be provided with a copy of this Policy and educated about its importance.

## **4. Continuous Disclosure Requirements**

In accordance with applicable securities and corporate laws, annual financial statements shall be reviewed by the audit committee of the Board (the “Audit Committee”) and approved by the Board and the interim financial statements shall be reviewed by the Audit Committee. The Audit Committee shall also review the press releases relating to all annual and interim financial statements and any financial guidance provided by the Company. The Company’s Audit Committee Charter sets forth in detail these responsibilities of the Audit Committee.

## 5. Principles of Disclosure of Material Information

**“Material information”** consists of both **“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 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.

Examples of material information may include:

- (a) changes in corporate structure, such as changes in share ownership that may affect control of the Company; major reorganizations, amalgamations, or mergers, take-over bids, issuer bids, or insider bids;
- (b) changes in capital structure, such as entering into an agreement to complete a public or private sale of additional securities; planned repurchases or redemptions of securities; planned splits of common shares or offerings of warrants or rights to buy shares; any share consolidation, share exchange, or stock dividend; changes in the Company's dividend payments or policies; the possible initiation of a proxy fight; material modifications to the rights of security holders;
- (c) changes in financial results such as shifts in financial circumstances, such as material cash flow reductions, major asset write-offs or write-downs; material changes in the value or composition of the Company's assets or mineral properties; any material change in the Company's accounting policies; litigation which may have a material impact on the Company;
- (d) changes in business and operations, such as any development that materially affects the Company's resources, products or markets; a significant change in capital investment plans or corporate objectives; any material exploration results on a property which is material to the Company; the announcement of the results of a technical report prepared in accordance with National Instrument 43-101, feasibility study, pre-feasibility study or assessment report containing previously undisclosed information of a technical nature; major labour disputes or disputes with major contractors or suppliers; changes to the Board or executive management, including the departure of the Company's Chairman, President, CEO or persons in equivalent positions; the commencement of, or developments in, material legal proceedings or regulatory matters directly involving the Company; waivers of corporate ethics and conduct rules for officers, directors, and other key employees or consultants; any notice that reliance on a prior audit is no longer

permissible; de-listing of the Company's securities or their movement from one quotation system or exchange to another;

- (e) significant acquisitions or dispositions of assets, property or joint venture interests; significant acquisitions of other companies, including a significant take-over bid for, or merger with, another company; and
- (f) changes in credit arrangements such as the borrowing or lending of a significant amount of money; significant new credit arrangements.

## **6. Assignment of Disclosure Responsibilities**

The CEO has overall responsibility for the implementation of this Policy. The Company may establish a disclosure committee of the Board (the "**Disclosure Committee**") to oversee the Company's disclosure practices. The responsibilities of the Disclosure Committee (or the Board if a Disclosure Committee has not been established) include:

- (a) maintaining written records of the Disclosure Controls and Procedures (as defined herein) followed in connection with the preparation, approval and dissemination of the Disclosure Statements;
- (b) designing, establishing and maintaining controls and other procedures (including procedures currently used by the Company) (collectively, "**Disclosure Controls and Procedures**") in connection with the release of the Company's (i) interim and annual financial statements and related management's discussion and analysis, annual information form (if applicable), management proxy circulars, material change reports, prospectuses, issuer bid circulars and any other reports and statements filed by the Company pursuant to securities laws; and (ii) Disclosure Statements;
- (c) implementing Disclosure Controls and Procedures to ensure that: (i) financial information disclosed by the Company fairly presents in all material respects the financial condition, results of operations and cash flows of the Company as of and for the periods presented therein; (ii) information required to be disclosed by the Company to securities regulatory authorities, and other information that the Company discloses to the investment community and the public is recorded, summarized and reported accurately, in a timely manner, and without omission of any material fact; and (iii) information is communicated to management, including the CEO and/or the Disclosure Committee, as appropriate, to allow timely decisions to be made regarding such required disclosure;
- (d) monitoring and reporting compliance with this Policy to the Compensation, Nominating and Governance Committee of the Board and, if appropriate, recommending amendments to this Policy; and

- (e) educating employees, officers and directors of the Company and its subsidiaries about this Policy.

The Disclosure Committee (or the Board if a Disclosure Committee has not been established) shall meet with all officers and any senior operational employees (as it may deem appropriate) periodically (as it may deem appropriate) to review and discuss, as applicable, the Company's information and developments, the Disclosure Controls and Procedures and this Disclosure Policy. Such meetings shall be in addition to, and not in lieu of, any meetings between the Audit Committee and such officers and employees.

All Responsible Persons, directly or through their immediate supervisor, must keep the CEO sufficiently apprised of potentially material developments so they can discuss and evaluate any events that might give rise to a disclosure obligation.

## **7. Method of Disclosure**

Disclosures of material, non-public information to stakeholders must be coordinated with the CEO. Once the CEO determines that a development or information is material information and such information must be disclosed, then such disclosure shall be made in one or more of the following methods:

- (a) a news release which is distributed in a manner designed to ensure wide dissemination;
- (b) a conference call and/or webcast or other meeting that is designed to provide broad, non-exclusionary distribution of the information to the public and to which the public has been provided adequate notice of the call or meeting and reasonable means for accessing the call;
- (c) a filing to the TSX Venture Exchange or the Toronto Stock Exchange, as applicable (the "**Exchange**") and/or the British Columbia Securities Commission, as applicable;
- (d) any combination of the foregoing methods.

In complying with the requirement to disclose forthwith all material information under applicable laws and stock exchange rules, the Company will adhere to the following basic disclosure principles:

- (a) material information will be publicly disclosed in a timely manner via a widely disseminated news release;
- (b) disclosure must include any information the omission of which would make the rest of the disclosure misleading (half truths are misleading);
- (c) unfavourable material information must be disclosed as promptly and completely as favourable information;

- (d) previously undisclosed material information must not be disclosed to selected individuals (for example, in an interview with an analyst or in a telephone conversation with an investor). If previously undisclosed material information has been inadvertently disclosed to an analyst or any other person not bound by an express confidentiality obligation, such information must be broadly disclosed immediately via news release; and
- (e) disclosure must be corrected immediately if the Company subsequently learns that earlier disclosure by the Company contained a material error at the time it was given.

The Company's policy is not to disclose any information that could be:

- (i) useful to a competitor, to someone negotiating with the Company, or in litigation with the Company. In such cases, information will be kept confidential until the Company determines it is appropriate to publicly disclose and will cause a confidential material change report to be filed with the applicable securities regulators, and will periodically (at least every 10 days) review its decision to keep the information confidential (also see 'Rumours');
- (ii) unfair disparagement to competitors; or
- (iii) unintentional disclosure of material non-public information.

If a Responsible Person believes that there may have been an accidental or unintentional disclosure of material non-public information, the employee must immediately notify the CEO of the incident. The Company will then determine whether to promptly file or issue a news release to fully disclose this information in accordance with applicable rules and regulations.

## **8. Review of Public Disclosure**

Prior to disclosure, the CEO shall review the text of public oral statements and documents that contain material information or that will be filed with the securities regulators or with the government or an agency of the government under applicable securities or corporate law or with the Exchange in order to ensure that the statement or document, as the case may be, does not contain a "misrepresentation" (as such term is defined under applicable Canadian securities laws). Such review shall be in addition to, and not in lieu of, the review of such statements or documents by other directors, officers or employees of the Company otherwise responsible for the matters discussed in such statements or documents and/or the review of such statements or documents.

## **9. Maintaining Confidentiality**

Any Responsible Person privy to confidential information is prohibited from communicating such information to anyone else other than in the necessary course of business. Efforts will be made to limit access to such confidential information to only those who need to know the information and such persons will be advised that the information is to be kept confidential.

Communication by email leaves a physical track of its passage that may be subject to later decryption attempts. Care must be taken when transmitting confidential information over the Public Wifi by email. The information should be limited to only those who need to know and transmission should proceed after verification of the email addresses of the intended recipients. Care must be used to ensure that the information is not transmitted to unintended recipients and emails should carry a notice that if it has been received by accident that the recipient should delete the email immediately and notify the sender of the unintended receipt.

Outside parties privy to undisclosed material information concerning the Company will be told that they must not divulge such information to anyone else, other than in the necessary course of business and that they may not trade in the Company's securities until the information is publicly disclosed. Such outside parties will confirm their commitment to non-disclosure in the form of a written confidentiality agreement.

Undisclosed material information shall not be disclosed to anyone except in the necessary course of business. If undisclosed material information has been disclosed in the necessary course of business, anyone so informed must clearly understand that it is to be kept confidential and, in appropriate circumstances, execute a confidentiality agreement. When in doubt, all persons to whom this Policy applies must consult with the CEO to determine whether disclosure in a particular circumstance is in the necessary course of business. 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. Applicable laws and regulations also prohibit "tipping", which would include communicating non-public material information, other than in the necessary course of business, to another person. All Responsible Persons must ensure that they do not divulge such non-public information to any unauthorized person, whether or not such person may trade on the information. If in doubt about the need to disclose, the matter should be discussed with the CEO.

In order to prevent the misuse or inadvertent disclosure of material information, the procedures set forth below should be observed at all times:

- (a) Documents and files containing confidential information should be kept in a safe place to which access is restricted to individuals who "need to know" that information in the necessary course of business and code names should be used if necessary.

- (b) Confidential matters should not be discussed in places where the discussion may be overheard, such as elevators, hallways, restaurants, airplanes or taxis.
- (c) Care must be exercised if confidential matters need to be discussed on wireless telephones or other wireless devices. This should be limited as much as practical.
- (d) Confidential documents should not be read or displayed in public places and should not be discarded where others can retrieve them.
- (e) Employees must ensure they maintain the confidentiality of information in their possession outside of the office as well as inside the office.
- (f) Employees must not discuss corporate matters in online chatrooms or bulletin boards.
- (g) Employees must not input confidential information into public generative artificial intelligence tools, such as ChatGPT. Employees may only use secure generative artificial intelligence tools approved for use by the Company, such as Copilot.
- (h) Transmission of documents by electronic means, such as by fax, public Wi-Fi or directly from one computer to another, should be made only where it is reasonable to believe that the transmission can be made and received under secure conditions.
- (i) Unnecessary copying of confidential documents should be avoided and documents containing confidential information should be promptly removed from conference rooms and work areas after meetings have concluded. Extra copies of confidential documents should be shredded or otherwise destroyed if no longer required.
- (j) Access to confidential electronic data should be restricted through either the use of passwords or controlled distribution by authorized senior management on a “need to know” basis.
- (k) The whereabouts of the Company’s personnel or the identity of visitors shall not be disclosed.

## **10. Designated Spokespersons**

The Company designates a limited number of official spokespersons authorized to communicate with the investment community, regulators and the media on behalf of the Company. This approach is intended to ensure that disclosure is coordinated, accurate and consistent.

Except as otherwise provided in this clause, only the CEO, President, Chief Financial Officer and members of the Board (each, an “**Authorized Spokesperson**”) are



permitted to communicate material information to the institutional and individual investment community, regulators or the media.

The following exceptions apply:

- (a) The VP Sustainability & External Relations and VP Environment & Permitting are authorized to communicate with regulatory authorities as necessary in the ordinary course of their respective responsibilities.
- (b) The Director of Marketing and Investor Relations is authorized to communicate with members of the investment community and the media as necessary in the ordinary course of their role, provided that such communications are consistent with the Company's disclosure record and otherwise in accordance this Policy.

From time to time, any Authorized Spokesperson may designate other employees or representatives of the Company to speak on behalf of the Company in connection with a specific event or purpose, such as an investor conference, group meeting, or one-on-one meeting. Such designation shall be limited in scope and duration, and will automatically expire following the completion of the designated communication, unless expressly renewed or extended by an Authorized Spokesperson.

Employees who are not an Authorized Spokespersons must not respond under any circumstances to inquiries from the investment community, the media or others, unless specifically asked to do so by an Authorized Spokesperson. Employees and other company representatives (other than the above Authorized Spokespersons) receiving any inquiries from the investment community shall not respond to such inquiries other than to refer the inquirer to the CEO.

All company meetings with members of the investment community shall be attended by an Authorized Spokesperson. Exceptions to this policy may be authorized only by one of the Authorized Spokespersons listed above.

## **11. News Releases**

Once the CEO determines that a development is material, consideration will be given to the issuance of a trading blackout in accordance with the Company's Insider Trading Policy. The issuance of a news release will then follow, unless the CEO determines that such developments must remain confidential for the time being, ensure appropriate confidential filings are made (if necessary), and that control of that inside information is instituted. Should a material statement inadvertently be made in a selective forum, the Company will immediately issue a news release in order to fully disclose that information.

If the stock exchange upon which shares of the Company are listed is open for trading at the time of a proposed announcement, prior notice of a news release announcing material information must be provided to the market surveillance department to enable a trading halt, if deemed necessary by the stock exchange. If a news release

announcing material information is issued outside of trading hours, market surveillance may be notified before the market opens.

News releases will be widely disseminated through an approved news wire service that provides simultaneous national and/or international distribution.

News releases shall be posted on the Company's website and SEDAR+ following dissemination over the news wire and are subject to the general legal disclaimer provisions and will be included in the news release.

## **12. Conference Calls**

Conference calls may be held for major corporate developments as the CEO may so determine from time to time, whereby discussion of key aspects is 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 news release containing all relevant material information. At the beginning of the call, a company spokesperson will provide appropriate cautionary language with respect to any forward-looking information and direct participants to publicly available documents containing the assumptions, sensitivities and a full discussion of the risks and uncertainties.

The Company will provide advance notice of the conference call and webcast by issuing a news release announcing the date and time and providing information on how interested parties may access the call and webcast. In addition, the Company may send invitations to analysts, institutional investors, the media and others invited to participate. Any non-material supplemental information provided to participants will also be posted to the Company's website. A tape recording of the conference call and/or an archived audio webcast on the Internet may be made available following the call for a minimum of 30 days.

## **13. Rumours**

The Company does not comment, affirmatively or negatively, on rumours. This also applies to rumours on the Internet. Any Authorized Spokesperson will respond consistently to those rumours, saying, "It is our policy not to comment on market rumours or speculation." Should the stock exchange request that the Company make a definitive statement in response to a market rumour that is causing significant volatility in the stock, the Disclosure Committee (or the Board if a Disclosure Committee has not been established) will consider the matter and decide whether to make a policy exception. If the rumour is true, in whole or in part, the Company will immediately issue a news release disclosing the relevant material information.

## **14. Contacts with Analysts, Investors and the Media**

Disclosure in individual or group meetings does not constitute adequate disclosure of information that is considered material non-public information. If the Company intends to announce material information at an analyst or shareholder meeting or a

press conference or conference call, the announcement must be preceded by a news release.

The Company recognizes that meetings with analysts, media outlets and significant investors are an important element of the Company's investor relations program. The Company will meet with analysts, media outlets and investors on an individual or small group basis as needed and will initiate contacts or respond to analyst, media and investor calls in a timely, consistent and accurate fashion in accordance with this Policy.

The Company will provide only non-material information through individual and group meetings, in addition to regular publicly disclosed information, recognizing that an analyst, media outlet or investor may construct this information into a mosaic that could result in material information. The Company cannot alter the materiality of information by breaking down the information into smaller, non-material components.

Authorized Spokespersons and the Director of Marketing and Investor Relations, as applicable, will keep a record of meetings with analysts and investors.

#### **15. Reviewing Analyst Reports and Models**

It is the Company's policy to review, upon request, analysts' draft research reports or models. Draft analysts' reports and financial models may be reviewed and commented upon only by the spokespersons authorized by the CEO for disclosures to the investment community. Company comments on these drafts will be limited to the following:

- (a) corrections of inaccurate historical public information;
- (b) deviations from information and projections the Company has publicly issued, specifying, without reaffirming, the date and/or occasion of such issuance;
- (c) non-material information, whether in the public domain or not, and
- (d) industry-related information.

It is the Company's policy, when an analyst inquires with respect to his/her estimates, to question an analyst's assumptions if the estimate is a significant outlier among the range of estimates and/or the Company's published financial guidance. The Company will limit its comments in responding to such inquiries to non-material information. The Company will not confirm, or attempt to influence, an analyst's opinions or conclusions. It should specifically be noted that the Company has not undertaken the obligation to update any forward-looking statement that it makes or has made, and that the Company, as a matter of policy, does not "embrace," "endorse" or state that it "is comfortable with" any analyst's report and/or financial model as a result of the Company's review process. 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.

## **16. Distributing Analyst Reports**

Analyst reports are proprietary products of the analyst's firm. The Company may post on its website a complete list of all analysts, regardless of the recommendation, of all the investment firms and analysts who provide research coverage on the Company. If provided, such list will not include links to the analysts' or any other third party websites or publications. Re-circulating a report by an analyst may be viewed as an endorsement by the Company of the report. For these reasons, the Company will not provide analyst reports through any means to persons outside of the Company, including posting such information on its website.

Notwithstanding the foregoing, the CEO may distribute analyst's reports to its directors and senior officers to monitor communications regarding the Company, and to assist them in determining how the marketplace values the Company.

## **17. Investor Relations, Promotional or Marketing Materials**

All investor relations, promotional or marketing material prepared by third parties must be prepared in consultation with, and be reviewed by, personnel in applicable internal departments of the Company, and input from external experts and advisors should be obtained as necessary, to ensure compliance with all securities laws and stock exchange rules.

As a general practice, the Company should not post any investor relations information on the Company's website that is prepared by a third party, unless the information was prepared on behalf of the Company or is general in nature and not specific to the Company. An email link will be provided on the Company's website for investors to communicate directly with the Company and the website will clearly distinguish between investor relations information and promotional or marketing material.

## **18. Forward-Looking Information**

All public disclosures of forward-looking information, including projections of future financial results or operational performance, shall be accompanied by appropriate cautionary language.

All public disclosures of forward-looking information must be made by and/or approved by either the CEO. Furthermore, once approved, the forward-looking information may be communicated to the public only by the CEO or his designated alternate.

Subsequent disclosures of forward-looking information may only be based upon information the Company has publicly disclosed, non-material information, whether in the public domain or not, and/or industry-related information, and in each case in compliance with the following sentence.

Except to the extent imposed by law, the Company shall not undertake any obligation to update any forward-looking information, and the Company will not respond, except by means of an appropriate public disclosure as provided herein, to any inquiries or rumours seeking reaffirmation of such information at any date subsequent to the date that such information was originally provided.

Should the Company elect to disclose forward-looking information in continuous disclosure documents, speeches, conference calls, etc.; the following guidelines will be observed.

- (a) The information, if deemed material, will be broadly disseminated via news release, in accordance with this Policy.
- (b) The information will be clearly identified as forward-looking.
- (c) The Company will identify all material assumptions used in the preparation of the forward-looking information.
- (d) The information will be accompanied by a statement that identifies, in very specific terms, the risks and uncertainties that may cause the actual results to differ materially from those projected in the statement.
- (e) The information will be accompanied by a statement that disclaims the Company's intention or obligation to update or revise the forward-looking information, whether as a result of new information, future events or otherwise. Notwithstanding this disclaimer, should subsequent events prove past statements about current trends to be materially off target, the Company may choose to issue a news release explaining the reasons for the difference.

## **19. Managing Expectations**

The Company will try to ensure, through its regular public dissemination of quantitative and qualitative information that analysts' estimates are in line with the Company's own expectations. The Company will not confirm, or attempt to influence, an analyst's opinions or conclusions and will not express comfort with analysts' models and financial estimates.

If the Company has determined that it will be reporting results materially below or above publicly held expectations, it will disclose this information in a news release in order to enable discussion without risk of selective disclosure.

## **20. Quiet Periods**

In order to avoid the potential for selective disclosure or even the perception or appearance of selective disclosure, the Company may from time to time implement a quiet period, which will commence (i) at the end of the last month of the fiscal period and continue until the issuance of a press release disclosing the financial results for such fiscal period or (ii) such other time period as may be determined by the CEO.

During a quiet period, the Company will not initiate or participate in any meetings or telephone contacts with analysts and investors and no forward-looking statements will be provided to anyone, other than responding to unsolicited inquiries concerning factual matters. No comments concerning the current fiscal period, nor any comments respecting past or present guidance, are permitted during the quiet period. Any press release to be issued by the Company during the quiet period should be reviewed and authorized by the CEO, unless such release has been separately reviewed and authorized by the Board.

## **21. Disclosure Record**

The CEO will maintain a five-year file containing all public information about the Company, including continuous disclosure documents, news releases, and analysts' reports.

## **22. Responsibility for Electronic Communications**

This Policy also applies to electronic communications. Accordingly, Responsible Persons accountable for written and oral public disclosures shall also be responsible for electronic communications.

The CEO is responsible for updating the investor relations section of the Company's website and is responsible for monitoring all company information placed on the website to ensure that it is accurate, complete, up-to-date and in compliance with relevant securities laws.

The Company shall approve all links from the Company's website to a third-party website. Any such links will include a notice that advises the reader that he or she is leaving the Company's website and that the Company is not responsible for the contents of the other site.

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 accurate at the time of posting, but may be superseded by subsequent disclosures. All data posted to the website, including text and audiovisual material, shall show the date such material was issued. Any material changes in information must be updated immediately. The minimum retention period for material corporate information on the website shall be two years.

ANA. Any disclosures of material information on its website will be preceded by the issuance of a widely disseminated news release.

Any Authorized Spokesperson shall be responsible for responses to electronic inquiries. Additionally, (i) the VP Sustainability & External Relations and VP Environment & Permitting are authorized to respond to electronic inquiries from regulatory authorities as necessary in the ordinary course of their respective responsibilities, and (ii) the Director of Marketing and Investor Relations is authorized to respond to electronic inquiries from members of the investment community and the media as necessary in the ordinary course of their role, provided that such

communications are consistent with the Company's disclosure record and otherwise in accordance with this Policy.

Members of the permitting and community departments are also responsible for responses to non-corporate or regulatory inquiries. Only public information or information which could otherwise be disclosed in accordance with this Policy shall be utilized in responding to electronic inquiries.

### **23. Communication and Enforcement**

This Policy extends to all Responsible Persons, including new hires, who will be provided with a copy of this Policy and will be educated about its importance. This Policy will be circulated to all Responsible Persons on an annual basis and whenever changes are made.

Any Responsible Person who violates this Policy may face disciplinary action up to and including termination of his or her employment, directorship or contract with the Company without notice. The violation of this Policy may also violate certain securities laws, and if this is the case, the Company may refer the matter to the appropriate regulatory authorities, which could lead to penalties, fines or imprisonment.

APPROVED AND ADOPTED by the Board of Directors of Snowline Gold Corp. on March 14, 2024, as amended November 12, 2025.