



SOCIAL MEDIA POLICY

Dated July 15, 2024

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I. INTRODUCTION

The board of directors (the “**Board**”) of G Mining Ventures Corp. (“**GMIN**” or the “**Corporation**”) has adopted this social media policy (this “**Policy**”) to govern the use of social media with respect to the Corporation.

For the purposes hereof, “**social media**” refers to online tools such as social networks, online communities, blogs, forums, social classified sites, wikis, virtual worlds, comment sections, and multimedia sites that are used to publish and discuss user content and/or to connect with others. As of the date hereof, social media platforms that are commonly used include Twitter, Facebook, YouTube, LinkedIn, Instagram, TikTok and Snapchat. By its very nature, social media is an ever-evolving technology and, as such, all forms of external-facing, online communications are within the scope of this Policy.

Social media is an important and popular method of networking and communication. Social media is being used to discuss topics of global importance and exchange ideas about public companies, often in real-time. Investors and analysts may use social media to research companies, discover new investment opportunities and connect and collaborate with such companies, other investors and the public generally. Other stakeholders (including the Corporation’s shareholders, suppliers, contractors, third party representatives and prospective personnel) also use social media to both gather and contribute information regarding companies.

While there are many benefits to social media, use of or appearance on social media platforms may give rise to certain risks to the Corporation’s business, including those relating to confidential and proprietary information, reputation, consistency of brand messaging, and compliance with laws. While all official social media content of the Corporation will be produced or communicated by the Corporation’s Authorized Spokespeople (as defined herein), personal use of social media can also inadvertently pose risks to the Corporation. To minimize those risks and to ensure that the Corporation is appropriately represented on social media platforms, all use of social media by GMIN Personnel (as defined herein) must comply with this Policy and to all of the Corporation’s policies, regardless of whether the use of or activity on social media is work-related or personal, utilizes Corporation or personal devices and accounts, or occurs on work or personal time.

II. SCOPE

This Policy applies to GMIN and all of its current and future subsidiaries and all of their respective directors, officers and employees (collectively, “**GMIN Personnel**”), and for the purposes hereof, references to the Corporation or GMIN are deemed to include references to each of the foregoing.

III. CONSIDERATION OF CORPORATION’S POLICIES AND SECURITIES LAWS

Any external interaction, including with the investor community, must always be made in compliance with applicable law, GMIN Personnel’s contractual obligations, and this Policy, as well as the Corporation’s other applicable policies including, without limitation, the Corporation’s

securities trading policy, corporate disclosure and confidentiality of information policy (the “**Corporate Disclosure Policy**”), and code of ethics and business conduct (the “**Code**”), copies of which have been made available to all GMIN Personnel.

In particular, material information concerning the Corporation cannot be discussed, posted or published publicly unless it has first been broadly disseminated in compliance with applicable securities laws, by way of a press release or a conference call (in accordance with the Corporate Disclosure Policy). In general, material information is information relating to the business, affairs, operations or capital of the Corporation for which the public disclosure results in, or would reasonably be expected to result in, a significant change in the market price or value of the Corporation’s securities or on any reasonable investor’s investment decisions. This includes material forward-looking information, such as anticipated financial results and the expected timing of significant future milestones. If GMIN Personnel are unsure whether material information proposed to be contained (or already contained) in their social media communications has previously been broadly disseminated or if their social media communications would contain (or already contained) material information, they should contact the chief executive officer or the vice president, investor relations & communications of the Corporation (each, a “**Policy Administrator**”) for further guidance.

Under no circumstance may information relating to trading in securities of the Corporation or its investees, or financial instruments related to any such securities, be discussed, posted or published by GMIN Personnel on social media.

IV. BUSINESS USE OF SOCIAL MEDIA

Only officers of the Corporation and the spokespeople designated in writing by either Policy Administrator (each an “**Authorized Spokesperson**” and, collectively, “**Authorized Spokespeople**”) are authorized to post, publish or distribute material or other communications about the Corporation using the Corporation’s authorized social media channels for the purposes of the Corporation’s marketing, investor relations or other business purposes. If GMIN Personnel are unsure whether they are Authorized Spokespeople, they should speak with a Policy Administrator for further guidance. If a member of GMIN Personnel is contacted or otherwise asked for comment by anyone through, or for publication using, a social media outlet, he or she must direct the inquiry to an Authorized Spokesperson.

Corporation-related information, including investor relations material, disclosed through social media should be viewed as an extension of the Corporation’s formal continuous disclosure record. Authorized Spokespeople must exercise care in ensuring that social media communications:

1. provide sufficient detail and are presented in an appropriate manner to ensure that social media users are able to understand the substance and significance of the information being discussed;

2. are not overly promotional or exaggerated or otherwise inconsistent with information already disclosed by the Corporation;
3. are factual and balanced, giving unfavourable news equal prominence to favourable news; and
4. provide the same cautionary statements, safe harbour disclaimers and other required disclosure (e.g., regarding forward-looking information and non-GAAP financial measures) as are required to be included in related press releases, and if such complete disclosure is impractical for a particular social media platform (e.g., due to character limits), a link to the full disclosure should be included as a prominent part of the social media disclosure.

Care must also be exercised by Authorized Spokespeople in the posting, publishing or disclosure related to third party materials (e.g., re-tweeting, providing external links, or other references to third party content, including analyst reports, as well as industry, political or social commentaries) as this may be viewed as an endorsement of such materials by the Corporation. Social media posts concerning third party work contracted by the Corporation should include prominent, clarifying disclosure concerning this fact.

GMIN Personnel should also avoid commenting or interacting with third party social media communications that may contain material information about the Corporation, such as the insolvency of a major service provider or other third party events that may be material to the Corporation. Any such commentary or interaction may raise selective disclosure concerns under applicable securities laws. If GMIN Personnel come across information published by a third party that may contain material information about the Corporation, they must contact either Policy Administrator for further guidance.

V. GENERAL GUIDELINES AND PROCEDURES

GMIN Personnel are expected to adhere to the following guidelines, but also to use their common sense and judgement and to consider the personal impact, as well as the impact on the Corporation and its employees, directors, officers, partners, investors, suppliers, contractors, vendors and other stakeholders (collectively, the “**GMIN Stakeholders**”) when engaging in social media.

A. PUBLICATIONS REFLECT ON THE CORPORATION

By participating in social media, GMIN Personnel are sharing their views and information with a broad audience and whatever is published can be available to the public for an indefinite period or possibly permanently. GMIN Personnel must keep their personal and professional reputation in mind and exercise their best judgment at all times. GMIN Personnel are personally responsible for what they communicate using social media.

While social media platforms may include content about the Corporation, GMIN Personnel must not respond to such content on behalf of the Corporation unless designated to do so as an Authorized Spokesperson. Whether or not GMIN Personnel directly identify themselves as being associated with the Corporation, the information and opinions they make public can reflect on the Corporation and GMIN Stakeholders. Even if GMIN Personnel publish anonymously or under a pseudonym, their identity and connection to the Corporation can still be discovered.

GMIN Personnel must make it clear in their personal social media postings that they are communicating or commenting on their own behalf. They may need to identify themselves as GMIN Personnel, but GMIN Personnel are prohibited from representing or suggesting that the online content they post is endorsed by the Corporation, including by the use of the Corporation's trademarks, logos, titles, email addresses, and/or letterhead. GMIN Personnel should communicate with either Policy Administrator for further guidance in this regard. In any case, they should write in the first person and use their personal (non-work) e-mail address when communicating via social media. They are also encouraged to include a disclaimer such as "*The views expressed here are my personal views and do not necessarily represent the views of G Mining Ventures Corp.*".

GMIN Personnel must ensure that the information they post is consistent with how they wish to present themselves to GMIN Stakeholders. They must always be polite and respectful when engaging in discussion on social media. They should weigh their words carefully and should not engage in online arguments. They should promptly correct any mistakes they make. If they are at all uncertain about what they are about to publish, they are expected to err on the side of caution.

B. RESPECT OF COLLEAGUES AND OTHERS

GMIN Personnel must not post anything or make statements using social media that GMIN Stakeholders would find offensive or inappropriate. In particular, they are strictly prohibited from posting any material that would violate the Corporation's policies, including, without limitation, sexually explicit or pornographic images or messages, ethnic slurs, racial or religious epithets, or anything that may be construed as harassing, threatening, or disparaging of others.

Subject to applicable law, they are also prohibited from posting defamatory or disparaging statements about the activities, business, property and business interests of the Corporation, of GMIN Stakeholders or others, including the Corporation's competitors. If they see content in social media that disparages or reflects poorly on the Corporation, they should contact either Policy Administrator. Protecting the Corporation's goodwill, business reputation and brand is everyone's responsibility.

C. MAINTAIN CONFIDENTIALITY

GMIN Personnel have an obligation to not use or disclose the Corporation's non-public information or that of GMIN Stakeholders, both during the term of their role as GMIN Personnel and for so long thereafter as such information remains non-public, and the Corporation expects

GMIN Personnel to comply with such obligation while using social media or participating in any media activity that is likely to end up online. Using generic terms rather than specific names online may not be sufficient to maintain such confidentiality. Further, even seemingly innocuous information like geo-tagging, checking-in or otherwise disclosing a location where they have travelled for business purposes could improperly disclose confidential information concerning a pending material transaction or other corporate development. Without limitation, areas that should not be discussed in any form of communication include the Corporation's pursuit of new business, marketing or business plans or strategies, financial information, third party personal information, including of GMIN Stakeholders, and any other information that could be deemed proprietary or the disclosure of which could violate a policy of the Corporation, privacy laws or be inconsistent with the Corporation's commitment to GMIN Stakeholders.

D. COMPLY WITH TERMS OF USE

GMIN Personnel may not expose the Corporation or themselves to liability or risk by using any social media platform in violation of its terms of use. They are expected to review the terms of use of all social media platforms that they visit and ensure compliance with such terms.

E. RESPECT WORK TIME

The use of social media for personal purposes should be done on personal time and should not interfere with work commitments.

VI. SOCIAL MEDIA IS PUBLIC AND MAY BE MONITORED

The Corporation hereby reserves the authority to monitor and access any information stored on or passing through the Corporation's network. All contents of the Corporation's information technology ("IT") resources and communications systems are the property of the Corporation. Therefore, subject to applicable law, GMIN Personnel should have no expectation of privacy whatsoever in any message, file, data, document, facsimile, telephone conversation, social media post, conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored, recorded or uploaded on the Corporation's electronic information and communications systems.

GMIN Personnel are expressly advised that, in order to prevent misuse, the Corporation reserves the right to monitor, intercept and review, without further notice (in compliance with applicable law), all GMIN Personnel's activities using the Corporation's IT resources and communications systems, including, but not limited to, social media postings and activities, and GMIN Personnel consent to such monitoring by their acknowledgement of this Policy and their use of such resources and systems. This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving and printing of transactions, messages, communications, postings, log-ins, recordings and other uses of the systems as well as keystroke capturing and other network monitoring technologies. The Corporation also may store copies of such data or communications after they are created and may delete such copies from

time to time without notice. GMIN Personnel may not use the Corporation's IT resources and communications systems for any matter that they intend to keep private or confidential from the Corporation.

In appropriate circumstances, the Corporation or either Policy Administrator may request that GMIN Personnel make revisions to or remove material posted on social media platforms.

VII. CONSEQUENCES

Any inappropriate dissemination, publication, disclosure or sharing of information via social media may result in legal consequences for both GMIN Personnel and the Corporation. GMIN Personnel who violate this Policy may be subject to disciplinary action, up to and including dismissal or termination for cause.

Should GMIN Personnel become aware of a violation of this Policy, they should consult with their immediate supervisor or either Policy Administrator. In addition, violations may be reported to the contacts listed in the Code.

In cases when such reporting is either inappropriate or does not provide the necessary level of confidentiality, GMIN Personnel can report their concerns through a confidential reporting system by sending an e-mail to: ethics@gminingventures.com.

VIII. KEY CONTACTS

Should GMIN Personnel have any questions or require additional information regarding this Policy, they should contact either Policy Administrator, as follows:

Louis-Pierre Gignac President & CEO C: 514.466.7606 lpignac@gminingventures.com	Jessie Liu-Ernsting Vice President, Investor Relations & Communications C: 416.809.9296 jliu-ernsting@gminingventures.com
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IX. REVIEW

On an as-needed basis, the environment, social & governance committee of the Board shall (i) review this Policy, including by assessing its effectiveness, and recommend any changes to this Policy to the Board; and (ii) monitor the implementation of this Policy. The Board may also amend this Policy, as required.

X. EFFECTIVE DATE

This Policy was adopted by the Board on July 15, 2024.

SCHEDULE 1
ACKNOWLEDGEMENT FORM

The undersigned hereby acknowledges that the undersigned has received and read a copy of this Policy and understands its contents. The undersigned understands that the Corporation reserves the right to amend this Policy at any time without notice.

[NAME OF GMIN PERSONNEL]

[Date]