



200 Burrard Street, Suite 1615, Vancouver, BC, V6C 3L6

LION ROCK RESOURCES WHISTLE BLOWING POLICY

1. OBJECTIVE AND SCOPE

Lion Rock Resources Inc. (the “**Company**”) is committed to the highest possible standards of openness, honesty and accountability as its various stakeholders are expecting this and are entitled to it.

The Company wants to know about dishonest, fraudulent, unacceptable behaviour, conduct and practices made by its employees regarding accounting, internal accounting controls or auditing, bribery and corruption or other related matters within the Company (a “**questionable event**”) and expects them and, as applicable, those of its affiliates (the Company and its affiliates are hereinafter referred to as the “**Company**” and the term “**employees**” refers to employees, directors, officers and consultants of the Company; for practical reasons, the masculine gender includes the feminine) to feel confident about disclosing and reporting on any concerns they may have about any questionable event of which they are aware.

In line with the Company’s above-stated commitment, this Internal Whistle Blowing Policy (the “**Policy**”) is structured as a formal tool to allow the receipt, retention and treatment of complaints, denunciations, warnings and any form of notice by any employee of the Company regarding a questionable event.

2. REPORTING OF COMPLAINTS

Employees are often the first ones to realize that there may be something seriously wrong within the Company; however, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Company. By the same token, it may also be easier for colleagues or superiors of such employees to ignore their concerns so raised rather than address same or report through higher echelons what might just be a suspicion of fraudulent or wrongful practices. The Company expects employees who have **reasonable grounds** for believing there is a questionable event within the Company to come forward and voice those concerns responsibly. This Policy is intended to encourage and enable employees to voice their concerns regarding any questionable event within the Company rather than ignoring them.

Reporting should be made as follows:

- a) Employees should report directly to their immediate supervisor.
- b) Any employee who finds his concerns about a questionable event not satisfactorily addressed by his immediate supervisor (or higher-ranking persons) or who feels that the seriousness and sensitivity of the issues or people involved require that the reporting of such questionable event should neither be addressed to the attention of

his immediate supervisor, nor follow the hierarchical ladder, should contact the Company's Corporate Secretary at:

E-mail: carrie@rsdcapital.com

Mail: Corporate Secretary
Suite 1615, 200 Burrard Street
Vancouver, BC
V6C 3L6

3. SAFEGUARDS AGAINST RETALIATION, HARASSMENT OR VICTIMIZATION

The Company acknowledges that one's decision to report a questionable event can be a difficult one to make. Employees who raise serious concerns should have nothing to fear. Therefore, the Company shall not tolerate any retaliation, harassment or victimization (including informal pressures) and shall take appropriate action to protect employees ("**concerned employees**") who raise any concerns under this Policy, or as otherwise provided for or protected under applicable law and regulations.

4. EXAMPLES OF REPORTING MISCONDUCT

Examples of misconduct or events that may be reported include, without limitation:

- violation of any applicable law, rule, or regulation that relates to corporate reporting and disclosure;
- fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement of the Company or any of its subsidiaries;
- fraud or deliberate error in the recording and maintaining of financial records of the Company or any of its subsidiaries;
- non-compliance with the Company's internal policies, procedures and controls;
- misrepresentation or a false statement by or to an employee of the Company respecting a matter contained in the financial records, reports, or audit reports;
- fraud or theft;
- offering or accepting a bribe;
- unlawful, corrupt or irregular use of the Company's funds or Company resources;
- an act, omission, or course of conduct that constitutes a serious risk to health, safety or the environment; and
- any other wrongdoing, including in connection with the Company's Code of Ethics or any policy.
- Serious wrongdoing is not limited to the above referenced examples.

5. CONFIDENTIALITY

Reports will only be accessible to people that the investigator designated by the Audit Committee determines have a "need to know" and where such access will not otherwise compromise or interfere with the independence, effectiveness and integrity of the investigation. Ordinarily, a need to know arises from an obligation to investigate or to take remedial action based on the information contained in the report. For greater certainty, sharing information on a questionable event in a manner required by this Policy will not be considered a breach of confidentiality.

6. RECORDS

The Whistle Blowing Officer will maintain a record of concerns raised and the outcomes (but in a form which does not endanger the confidentiality of a concerned employee's identity where necessary) and will report to the Chair of the Audit Committee, and, as necessary, to management.

7. INVESTIGATION

The Chair of the Audit Committee shall determine, with the Corporate Secretary, the steps to be taken to address the concerns appropriately and whether an investigation is appropriate and, if so, what form it should take as well as other parameters (appointment of investigators, timetable, etc.).

A concerned employee shall be informed of the outcome of any investigation or of any treatment of his claim or notice and/or resolution thereof.

8. ANNUAL REVIEW

This Policy shall be reviewed annually to ensure that it is effectively facilitating confidential and anonymous reporting of Accounting Concerns. Any recommended changes to the policy will be considered by the Audit Committee, and if appropriate, submitted to the Board for approval.

Nothing in this Policy shall prevent an employee from reporting a questionable event to any government agency, such as the British Columbia, Alberta or Ontario Securities Commission, as provided for or protected under applicable law and regulations.

This Policy was adopted by the Board of Directors on October 30, 2025.

Issued: October 30, 2025

Review Date: November 1, 2026

Responsible Committee: Audit Committee

This Policy has been approved by the Board of Directors of Lion Rock Resources Inc.

Lion Rock Resources Inc.

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