LION ROCK
RESOURCES INC.
200 Burrard Street, Suite 1615, Vancouver, BC, V6C 3L6

LION ROCK RESOURCES INC.
SECURITIES TRADING POLICY

OBJECTIVE AND SCOPE

In line with its commitment to implement sound corporate governance practices, Lion Rock Resources Inc. ("**Lion Rock**" or the "**Company**") acknowledges the importance of setting up guidelines for trading in its shares or other securities of Lion Rock (hereinafter referred to as "**securities of Lion Rock**"). Naturally, such guidelines will minimize the risks of violations of the securities laws.

The Company's Securities Trading Policy (the "**Policy**") incorporates the rules on trading and dealings in securities included in applicable securities legislation and the rules of the TSX Venture Exchange. Accordingly, this policy extends to all directors, officers and employees of Lion Rock and of its subsidiaries.

GENERAL

Securities laws prohibit anyone having a close or special relationship with Lion Rock from purchasing or selling (or otherwise disposing of) securities of Lion Rock when any such person has knowledge of material non public information about the Company's business. Securities laws also prohibit the communication of material non public information to any person (including family and friends), except on a need-to-know basis in the necessary course of business. At the appropriate time, the Company discloses material information publicly via news release or otherwise. However, prior to such public disclosure, directors, officers and/or employees may have knowledge of material non public information and, under any such circumstances, they must exercise the utmost care in handling such material non public information to avoid legal and ethical violations.

Material non public information about the Company's means any fact, event, circumstances or change in the activities, business or property of the Company that is not known to the public and that results in, or would reasonably be expected to result in, a significant change in the market price or value of the securities of Lion Rock. It also means any information that would reasonably be expected to have a significant influence on any reasonable investor's decision to buy, sell or hold securities of Lion Rock.

This would include, but is not limited to, non public information regarding:

- (a) earnings and other financial results;
- (b) acquisition or disposition of material assets;
- (c) mineral discoveries;
- (d) agreements or arrangements for take-overs, mergers, consolidations, amalgamations or reorganizations;
- (e) agreements or arrangements for joint ventures;
- (f) changes in the capital structure, including share or debenture issues, stock splits or stock dividends;

(g) changes in share ownership that may affect control of the Company;
(h) borrowing material funds;
(i) public or private sale of securities of Lion Rock;
(j) changes in capital expenditure plans or corporate objectives;
(k) significant changes in the Company's management or board of directors;
(l) significant litigation;
(m) major labour disputes or disputes with major contractors, suppliers, or customers;
(n) events of default under financing or other agreements; and
(o) any other change in the business, affairs or property of the Company that could reasonably be expected to materially affect the price or value of the securities of Lion Rock or have an influence on a reasonable investor's investment decision.

TRADING GUIDELINES

To achieve its above-stated objective, the Company hereby establishes the following guidelines with respect to the trading in securities of Lion Rock by its directors, officers and employees:

1. the Company's directors, officers and employees, as well as family members living under the same roof, must not buy or sell securities of Lion Rock where they are aware of material non public information about the Company's business;

2. the Company's directors, officers and employees, must not buy or sell securities of the Lion Rock, during the period encompassed between the third trading day preceding public disclosure of the financial results and the second trading day following the public disclosure of the financial results for a fiscal quarter or fiscal year end by way of a news release or the filing of the financial documents on SEDAR+; provided that such guideline is not applicable to purchases of common shares under any employees share purchase plan ("**Share Plan Purchase**") that could be implemented by the Company;

3. the Company's directors and officers must not buy or sell securities of Lion Rock, before the second trading day following the public disclosure of any material information; provided that such guideline is not applicable to Share Plan Purchases;

4. the Company's directors and officers must not short sell securities of Lion Rock; and

5. the Company's directors and officers shall not use any strategy relating to or use derivative instruments in respect of securities of Lion Rock, including financial instruments that are designed to hedge or offset a decrease in market value of securities of Lion Rock.

INSIDERS

All directors, officers and shareholders (holding over 10% of the voting rights attached to all outstanding voting securities, including the directors of such shareholders, as applicable) of the Company are insiders, including every director or officer of a subsidiary of the Company.

INSIDER TRADING OBLIGATIONS

A person who is an insider of the Company must, within ten (10) days of becoming an insider, file an insider report on www.sedi.ca in the required form effective the date on which the person becomes an insider disclosing any direct or indirect beneficial ownership or control or direction over securities of Lion Rock (provided however that it is not necessary for an individual who has become an insider to file a "nil" insider report). In addition, insiders must file an insider report disclosing changes in an insider's securities holdings (including the grant or exercise of stock options, restricted share units and deferred share units and grant and expiry of warrants). Insider reports disclosing changes in an insider's securities holdings must be filed on www.sedi.ca within five (5) days of any transaction, or within such shorter period as may be prescribed.

BLACKOUT PERIODS

From time to time, management may extend the above-described period of times where trading in securities of Lion Rock is prohibited ("**blackout periods**"), designate additional blackout periods or may prohibit the trading in the securities of any other publicly-owned company under special circumstances. Management may also subject certain senior managers to one or more guidelines of this Policy applicable to directors and officers of the Company. In a timely manner, directors, officers and employees will be informed of such extended or additional blackout periods, additional blacked out security or list of senior managers subject to one or more guidelines of this Policy applicable to directors and officers of the Company.

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

Issued: October 30, 2025
Version: 1.0
Review Date: November 1, 2026
Responsibility: Board of Directors

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