



SECURITIES TRADING POLICY

OBJECTIVE AND SCOPE

In line with its commitment to implement sound corporate governance practices, Vior Gold Corporation Inc. (“**Vior Gold Corporation**” or the “**Corporation**”) acknowledges the importance of setting up guidelines for trading in its common shares or other securities of Vior Gold Corporation (hereinafter referred to as “**Securities of Vior Gold Corporation**”). Naturally, such guidelines will minimize the risks of violations of the securities laws.

The Corporation’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 or, as deemed appropriate, employees of Vior Gold Corporation and of its subsidiaries (“**Responsible Persons**”).

GENERAL

Securities laws prohibit anyone having a close or special relationship with Vior Gold Corporation from purchasing or selling (or otherwise disposing of) Securities of Vior Gold Corporation when any such person has knowledge of material non-public information about the Corporation’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 Corporation discloses material information publicly via news release or otherwise. However, prior to such public disclosure, Responsible Persons 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.

A material non-public information about the Corporation’s business means any fact, event, circumstances or change in the activities, business or property of the Corporation 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 Vior Gold Corporation; 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 Vior Gold Corporation.

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 Corporation;
- (h) borrowing material funds;
- (i) public or private sale of Securities of Vior Gold Corporation;
- (j) changes in capital expenditure plans or corporate objectives;
- (k) significant changes in the Corporation’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 Corporation that could reasonably be expected to materially affect the price or value of the Securities of Vior Gold Corporation or have an influence on a reasonable investor’s investment decision.



TRADING GUIDELINES

To achieve its above-stated objective, the Corporation hereby establishes the following guidelines with respect to the trading in Securities of Vior Gold Corporation by its Responsible Persons:

1. Responsible Persons, as well as family members living under the same roof, must not buy or sell Securities of Vior Gold Corporation where they are aware of material non-public information about the Corporation's business;
2. Responsible Persons must not buy or sell Securities of Vior Gold Corporation, during the period encompassed between the tenth 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 press release;
3. Responsible Persons must not buy or sell Securities of Vior Gold Corporation, before the second trading day following the public disclosure of any material information;
4. Responsible Persons must not short sell Securities of Vior Gold Corporation; and
5. Responsible Persons shall not use any strategy relating to or use derivative instruments in respect of Securities of Vior Gold Corporation, including financial instruments that are designed to hedge or offset a decrease in market value of Securities of Vior Gold Corporation.

INSIDERS

All directors, officers and shareholders (holding over 10% of the voting rights attached to all outstanding voting securities) of the Corporation are insiders ("**Insiders**").

INSIDER TRADING OBLIGATIONS

A person who is an Insider of Vior Gold Corporation must, within ten (10) days of becoming an Insider, file an insider report on www.sedi.ca in the required form disclosing any direct or indirect beneficial ownership or control or direction over Securities of Vior Gold Corporation (provided however that it is not necessary for 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.

NOTIFICATION OF TRADING BY INSIDERS

In all circumstances and as a precaution only, the Corporation's directors, officers and employees must obtain from the Corporate Secretary and in her absence, the President and Chief Executive Officer, or in his absence, the Chief Financial Officer, a prior written approval for any purchase or sale of securities of Vior Gold Corporation, which approval will be valid for a maximum of ten (10) business days; provided that compliance with applicable laws and this Policy remains the ultimate responsibility of directors, officers and employees, notwithstanding any approval under this section.

From time to time, management may designate a period of times where trading in Securities of Vior Gold Corporation is prohibited ("**Black Out Periods**") or may prohibit the trading in the securities of any other publicly-owned company under special circumstances. Management may expand the scope of persons defined as Responsible Persons, as circumstances dictate. In a timely manner, Responsible Persons will be informed of such Black Out Period(s) or additional blacked out security.

Any person (whether defined as a Responsible Person or not) that has any question regarding his or her ability to purchase or sell Securities of Vior Gold Corporation, or any other question concerning this Policy, should consult with the Corporation's CEO and Corporate Secretary.

POLICY REVIEW

The Policy will be reviewed annually by the Governance and Compensation Committee.

This Policy was adopted by the Board of Directors on February 20, 2025 and amended on March 18, 2026