April 2026

GALANTAS GOLD CORPORATION

Insider Trading and Blackout Policy

This document sets forth Galantas Gold Corporation's ("Galantas" or the "Company") policy on insider trading and trading blackouts in order to ensure the strict compliance by all insiders with the prohibition against insider trading.

1. Approval to trade

Prior to initiating any trade in securities of Galantas, a director, officer, persons discharging managerial responsibility (" PDMRs") (including their persons closely associated with the PDMR ("PCAs") or employee other than the Chief Executive Officer and the Chief Financial Officer seeking to make the trade must contact the Chief Executive Officer or the Chief Financial Officer or the Secretary of Galantas to determine whether or not they may complete the trade. In the case of the Chief Executive Officer, he/she must contact the Chairman or the Chief Financial Officer or the Secretary of Galantas to determine whether he/she may complete the trade. In the case of the Chief Financial Officer he/she must contact the Chief Executive Officer or the Secretary of Galantas to determine whether or not he/she may complete the trade.

2. Insiders

All directors, officers and significant shareholders (over 10%) of Galantas are insiders. An "officer" is defined as:

(a) a chair or vice-chair of the board of directors, a chief executive officer, a chief operating officer, a chief financial officer, a president, a vice-president, a secretary, an assistant secretary, a treasurer, an assistant treasurer and a general manager,

(b) anyone else designated as an officer by an issuer, or

(c) any other individual who performs functions for an issuer similar to those normally performed by an individual referred to in (a) or (b).

Certain insiders, referred to as "reporting insiders" for the purposes of Canadian securities laws and (PDMR) for the purposes of the AIM rules are required to report any trades in securities of the Company. Reporting insiders and PDMRs include:

(a) the CEO, the COO, the CFO, Secretary

(b) the directors,

(c) anyone responsible for a principal business unit, division or function within the Company,

(d) anyone performing functions similar to the functions in (a), (b) or (c), and

(e) any insider that receives or has access to material information before it is generally disclosed and has the ability to exercise significant power or influence over the business, operations, capital or development of the Company.

Persons closely associated (PCAs) with PDMRs also have reporting obligations. A PCA includes a spouse or civil partner; children under 18; a relative who has lived in the same household for a year; and a legal person, trust or partnership that is connected.

Anyone who is unsure about his or her potential status as a reporting insider or PDMR, or about who qualifies as a PCA, should contact the President & CEO.

Reporting insiders must file an initial report with the applicable securities commissions in Canada within 10 days of acquiring any securities in Galantas or becoming an insider (whichever last occurs), and must thereafter report all trades made in the securities of Galantas within five days of the day the trade is made.

PDMRs and PCAs are required to notify transactions in any financial instruments of Galantas to the Company and the financial conduct authority (the"FCA") within three business days of the transaction (https://marketoversight.fca.org.uk/electronicsubmissionsystem/MaPo_PDMR_Introduction) , and Galantas is obliged to publish this information within three days of the transaction. Trades include a change in nature of the ownership of the securities (e.g. a disposition to a company controlled by the insider or a determination that the securities are to be held in trust for another person). Anyone who is unsure whether a trade will occur should contact the President and CEO prior to any dealing. Each person that is obligated to file a report is responsible for filing his or her own report.

In addition to the reporting insider and PDMR rules, it is a requirement that each director, officer, PDMR (and their PCAs) and employee notify Galantas of the percentage of the Company's voting rights he or she holds if the percentage of those voting rights reaches, exceeds or falls below 3%, 4%, 5%, 6%, 7%, 8%, 9%, 10% and each 1% threshold thereafter. The information to be disclosed includes:

- the identity of the person;
- the date on which the relevant change to the holding was effected;
- the price, amount and class of the securities concerned;
- the nature of the transaction;
- the nature and extent of the person's interest in the transaction;
- where the notification concerns a related financial product, the detailed nature of the exposure.

3. "Special Relationship"

Any person or company that is in a "special relationship" with Galantas is prohibited from trading on the basis of undisclosed material information concerning the affairs of Galantas. A person or company considered to be in a "special relationship" includes the following:

a) insiders;

b) affiliates or associates of Galantas which include, for example, Galantas's subsidiaries and all employees, their spouses and other relatives that live with the employee;

c) a person or company proposing to make a take-over bid of Galantas or to become a party to a reorganization, amalgamation or merger with Galantas;

d) a person involved in the provision of business or professional services for Galantas, including employees; and

e) anyone who learns of material undisclosed information from any other person in a special relationship with Galantas.

Securities laws also prohibit "tipping" which is defined as communicating non-public material information, other than in the necessary course of business, to another person. All employees 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 President of Galantas.

4. General Rule

All those with access to material confidential information are prohibited from using such information in trading in Galantas's securities until the information has been fully disclosed and a reasonable period of time has passed for the information to be disseminated. In general, Galantas has stipulated that a minimum of two clear trading days be allowed after the release of all such disclosures, including after the release of financial statements.

Although not intended to be a comprehensive list, the following are examples of information that could be material, depending on scale and magnitude:

- changes in corporate structure,
- changes in capital structure,
- changes in financial results,
- changes in business and operations,
- acquisitions and dispositions,
- changes in credit arrangements, and
- any other developments relating to the business and affairs of the company that would reasonably be expected to significantly affect the market price or value of any of the company's securities or that would reasonably be expected to have a significant influence on a reasonable investor's investment decisions.

This prohibition applies not only to trading in Galantas's securities, but also to trading in other securities whose value may be affected by changes in the price of Galantas's securities.

If a director, officer or employee of Galantas becomes aware of undisclosed material information about another company, that person may not trade in securities of that other company

Insider trading is strictly regulated by the corporate and securities laws in Canada, as well as The Toronto Venture Exchange and the rules of the Alternate Investment Market.

5. Speculation In Securities

In order to ensure that perceptions of improper insider trading do not arise, insiders should not "speculate" in securities of Galantas. For the purpose of this Policy, the word "speculate" means the purchase or sale of securities with the intention of reselling or buying back in a relatively short period of time in the expectation of a rise or fall in the market price of such securities. Speculating in such securities for a short term profit is distinguished from purchasing and selling securities as part of a long term investment program.

Insiders should not at any time sell securities of Galantas short or buy or sell a call or put option in respect of securities of Galantas or any of its affiliates.

6. Liability For Insider Trading

Liability is imposed by the *Securities Act* (Ontario) (the "Act") on certain persons who, in connection with the purchase or sale of securities, make improper use of material information that has not been publicly disclosed.

The relevant provincial securities legislation provides that persons who are in a special relationship with Galantas and purchase or sell securities of Galantas with knowledge of material information which has not been generally disclosed may be liable for damages to the person on the other side of the trade. In addition, any such person who informs or tips a seller or a purchaser of securities of confidential material information may be liable for damages. The purchaser, vendor or informer is also liable to account to Galantas for his or her gain. Under the Act, a person could also be fined up to the greater of $5,000,000 and three times any profit made or the loss avoided by reason of the contravention and/or imprisoned for up to five years.

7. What Is A Security?

The definition of "security" includes shares, options, subscriptions or other interests in or to a security and includes puts, calls, warrants, or other rights or obligations to purchase or sell securities, the market price of which varies materially with the market price of the securities of Galantas

8. Trading Blackouts

(i) <u>General</u>

A trading blackout prohibits trading:

a) before a scheduled material announcement is made;

b) before an unscheduled material announcement is made; and

c) for a specific period of time after a material announcement has been made

Management will consider pending transactions to determine when to prohibit trading. In some cases, the prohibition on trading may occur as soon as discussions about a transaction begin. During blackout periods, Galantas must also avoid discussions with analysts, private briefings and interviews to the maximum extent reasonable. An appropriate response (not involving disclosure of material non-public information) should be developed ahead of meetings that cannot be avoided to handle questions about the information which is the subject of the blackout.

(ii) <u>Pre-announcement Trading Blackout</u>

a) Scheduled material announcements

All directors, officers, PDMRs (including their PCAs) and employees are prohibited from trading for a minimum of 35 days before the release of quarterly financial statements and 35 days before the release of semi-annual and annual financial statements.

b) Unscheduled material announcements

Galantas will impose a blackout period if there is a pending undisclosed material development on all directors, officers and employees where they are prohibited from trading. The blackout period will commence at the time that Galantas becomes aware of material undisclosed information.

(iii) <u>Post-announcement Trading: Blackout</u>

Galantas must allow the market time to absorb the information before directors, officers and employees can resume trading after the release of material information.

a) Scheduled material announcements

All directors, officers, PDMRs (including their PCAs) and employees are prohibited from trading for two trading days after the release of financial statements.

b) Unscheduled material announcements

All directors, officers and employees are prohibited from trading for two trading days after the announcement has been made.

Approved April 2026 re Aim Chg