



DISCLOSURE, INSIDER TRADING AND BLACKOUT PERIODS POLICY (As of November 17, 2025)

PART I INTRODUCTION

PURPOSE OF POLICY

This disclosure, insider trading, and blackout periods policy (the “**Policy**”) is intended to assist the St. Augustine Gold and Copper Limited (“**St. Augustine**” or the “**Company**”) in fulfilling its obligations to ensure that all information relevant and material to the market and St. Augustine’s shareholders is disclosed in a timely manner while protecting the Company’s commercially sensitive or confidential information. Equally important, this Policy assists individuals associated with the Company who have material information related to its business and affairs in meeting their obligations concerning trading in St. Augustine’s shares while outlining the relevant trading restrictions and policies applicable to St. Augustine’s directors, officers and employees. In addition, this Policy aims to promote an understanding of the legal requirements among St. Augustine’s directors, officers and employees.

The objective of this Policy is to ensure the Company’s communications with the public are:

- timely, factual, full, true and plain disclosure; and
- broadly disseminated in accordance with all applicable legal and regulatory requirements.

This Policy is also intended to assist the Chief Executive Officer, Chief Operating Officer and the Chief Financial Officer of St. Augustine in making certifications with respect to the disclosure controls of St. Augustine required under National Instrument 52-109 – *Certification of Disclosure in Issuers’ Annual and Interim Filings* and to assist any director or officer of St. Augustine in the conduct of the reasonable investigation required to provide a defence to any action against such director or officer based on a misrepresentation or failure to make timely disclosure with the approval of the Chair of the board of directors (the “**Board**”) and legal counsel.

SCOPE OF POLICY

This Policy extends to all directors, officers and employees of St. Augustine, those authorized to speak on its behalf and all other insiders and covers all disclosure, including disclosure made in:

- all statutorily mandated documents filed with securities regulators;
- all written statements made in non-mandated documents such as letters to shareholders, presentations by senior management and information contained on St. Augustine’s website and in other electronic communications;

- all oral statements, including oral statements made in meetings and phone conversations with analysts and investors, media interviews, speeches, press conferences and conference calls; and
- any other communication, the content of which would reasonably be expected to effect the market value or price of any security of St. Augustine.

ADMINISTRATION

St. Augustine has established a Disclosure Committee (the “**Committee**”) which shall be part of the Nominating and Corporate Governance Committee responsible for overseeing, among other things, the Company’s disclosure practices and procedures. The Committee shall have the authority to retain experts, including lawyers, accountants, engineers and other persons, to assist the Committee as they deem necessary.

DEFINITIONS

“**Board**” means the board of directors of St. Augustine.

“**Corporate Secretary**” means the corporate secretary of St. Augustine.

“**Designated Insider**” means a St. Augustine Member that the Company designates as a person who is subject to certain trading restrictions due to their access to Privileged Information about St. Augustine.

“**Designated Member**” means a St. Augustine Member: (i) who, as a participant in a material acquisition, outsourcing project or other material event or transaction, has signed a confidentiality or non-disclosure agreement containing trading restrictions; or (ii) who has otherwise been identified as a Designated Member by the Company.

“**Privileged Information**” means any information that has not been disclosed to the public and could affect the decision of a reasonable investor, as well as any fact or any change in business, operations or capital that would reasonably be expected to have a significant effect on the market price or value of any security and which has not been generally disclosed, including a decision to implement such a change made by the Board or senior management who believes that confirmation of the decision by the Board is probable.

“**Reporting Insider**” means any St. Augustine Member designated by the Company as a reporting insider within the meaning of National Instrument 55-104 – *Insider Reporting Requirements and Exemptions*.

“**St. Augustine Members**” means all employees, officers and directors of St. Augustine.

“**St. Augustine Securities**” means shares, options, notes and any other securities that the Company may issue from time to time (such as bonds or convertible securities) and includes, for the purposes of this Policy, any instrument, agreement or security whose value, market price or payment obligations are based on the value, market price or payment obligations of a security of the Company (such as deferred stock units and performance share units) and any other instrument, agreement or understanding that affects, directly or indirectly, a person’s economic interest in a security of the Company.

PART II GENERAL RESTRICTIONS APPLICABLE TO ALL ST. AUGUSTINE MEMBERS

It is illegal under the laws and regulations of Canada, the United States and other jurisdictions to trade in shares and other securities while in possession of privileged or material undisclosed information and to communicate such information to others who you would expect to trade in such shares or securities. The prohibited activities often are called “insider trading” and “tipping.”

INSIDER TRADING

St. Augustine Members are prohibited from trading in St. Augustine Securities while in possession of Privileged Information, subject to the limited exceptions under applicable laws and regulations. They are also prohibited from trading in another public company’s securities while in possession of Privileged Information regarding that public company gained during the course of the St. Augustine Member’s work.

TIPPING

St. Augustine Members are prohibited from disclosing Privileged Information to, or “tipping”, another party or recommending that another party trade in St. Augustine Securities or another public company’s securities while a St. Augustine Member has knowledge of Privileged Information. Tipping is a violation of laws and regulations even if the person disclosing the information does not personally make a trade or otherwise benefit from disclosing the information.

There are limited circumstances in which Privileged Information may be disclosed in the necessary course of business if there are no grounds to believe the Privileged Information will be used or disclosed contrary to applicable laws and regulations. If a St. Augustine Member believes he or she is faced with these circumstances, he or she should send a request through the Corporate Secretary to confirm whether Privileged Information may be disclosed.

CONSEQUENCES OF NON-COMPLIANCE

The consequences of insider trading and tipping can be severe. St. Augustine Members who contravene applicable laws and regulations will be subject to disciplinary actions, which may include restrictions on future participation in equity-based incentive plans or termination of employment without notice or payment in lieu of notice, and expose themselves to criminal, penal and administrative actions by the relevant authorities, which could lead to substantial fines and imprisonment.

PROHIBITION ON TRADING – “SPECIAL RELATIONSHIP”

Under applicable securities legislation, a person in “special relationships” with a public issuer is prohibited from trading in securities of that public issuer. From time to time, St. Augustine will be considered to be in a “special relationship” with other public issuers as a result of receiving confidential information in connection with potential mergers, acquisitions or significant asset purchases or sales. St. Augustine Members will also be considered to be in a “special relationship” and may not trade in securities of such public issuers once they have any knowledge relating to such public issuers.

The Board considers it inappropriate for any director, officer or employee of St. Augustine or a subsidiary of St. Augustine to trade in the securities of any public issuer based upon information obtained, whether from public or confidential sources, in the course of their employment while St. Augustine is considering a merger, acquisition or significant asset purchase or sale with such public issuers.

PART III ADDITIONAL RESTRICTIONS APPLICABLE TO REPORTING INSIDERS, DESIGNATED INSIDERS, AND DESIGNATED MEMBERS

TRADING RESTRICTIONS AND BLACKOUT PERIODS

All Reporting Insiders and Designated Insiders are subject to regular blackout periods in connection with the release of St. Augustine's quarterly and annual financial results. Reporting Insiders and Designated Insiders may only trade in St. Augustine Securities within the period beginning on the second business day following the release of St. Augustine's quarterly and annual financial results and ending at the close of business on the seventh calendar day preceding the release of the next quarterly or annual financial results.

The Corporate Secretary may, from time to time, as a result of special circumstances relating to St. Augustine, such as an acquisition, project, amalgamation or any other transaction, designate a discretionary blackout period for such length of time as is deemed necessary and determine the St. Augustine Members to which such discretionary blackout period applies. Such St. Augustine Members will become Designated Members and will be prohibited from trading in St. Augustine Securities during the discretionary blackout period.

Notwithstanding the foregoing: (a) as part of the yearly operational planning and budget approval process, the Board of Directors may, in accordance with applicable laws and regulations, grant stock options or other equity awards to St. Augustine Members during blackout periods; and (b) automatic purchases in accordance with applicable laws and regulations may be made during blackout periods under any written automatic plan established by St. Augustine prior to the relevant periods.

St. Augustine Members who have signed a confidentiality or non-disclosure agreement and are, as such, Designated Members may only trade St. Augustine Securities in accordance with the terms and conditions of such agreements.

Notwithstanding the foregoing formal blackout periods, no St. Augustine Member shall trade while in possession of Privileged Information, such as during periods when certain St. Augustine Members prepare financial statements but results have not yet been publicly disclosed, regardless of whether or not a formal Blackout Period has been announced or the foregoing quarterly restrictions are in effect. Notice of such blackouts may or may not be communicated by the issuance of a formal notice.

ANTI-HEDGING RESTRICTIONS

Reporting Insiders and Designated Insiders shall not, in respect of St. Augustine Securities, engage in: (a) short sales; (b) transactions in derivatives in respect of St. Augustine Securities, such as put and call options; or (c) any other hedging or equity monetization transaction in which the individual's economic interest and risk exposure in St. Augustine Securities is changed, such as collars or forward sales contracts.

PRE-CLEARING TRADES

All Reporting Insiders, Designated Insiders and Designated Members who wish to trade in St. Augustine Securities must first submit a request to the Corporate Secretary. A request should specify the type of transaction (e.g., purchase, sale or exercise of stock options and confirmation on the intention to subsequently hold or sell the underlying shares). No trade by such St. Augustine Members may be carried out without the pre-clearance of the Corporate Secretary.

St. Augustine Members are reminded that, notwithstanding the pre-clearance of a trade by the Corporate Secretary, the ultimate responsibility for complying with the insider trading restrictions rests with the individual trading in St. Augustine Securities.

FILING INSIDER REPORTS

An initial filing must be completed electronically on the System for Disclosure by Insiders (“**SEDI**”) within 10 days of becoming a Reporting Insider of St. Augustine, disclosing the Reporting Insider’s beneficial ownership of, or control or direction over, whether direct or indirect, St. Augustine Securities.

Reporting Insiders are required to report any changes in their beneficial ownership of, or control or direction over, whether direct or indirect, St. Augustine Securities electronically on SEDI within 5 days after the date such change occurs in accordance with applicable laws and regulations.

The Company may assist in completing and filing insider reports, but the ultimate responsibility for complying with the insider filing requirements rests with the individual trading in St. Augustine Securities. Reporting Insiders should submit a copy of all insider filings to St. Augustine’s Chief Financial Officer.

Should any St. Augustine Member have questions concerning whether they are a Reporting Insider of the Company, they should contact the Chief Financial Officer or the Corporate Secretary of St. Augustine.

PART IV DISCLOSURE POLICY

DESIGNATED SPOKESPERSONS

The Company designates a limited number of spokespersons responsible for communication with the investment community, regulators or the media, and the official spokespersons are as follows:

- Executive Director; and
- Project Director

Individuals holding these offices may, from time to time, designate others within the Company to speak on behalf of the Company as back-ups or to respond to specific inquiries.

Employees who are not authorized spokespersons must not respond under any circumstances to inquiries from the investment community, the media or others unless specifically asked to do so by an authorized spokesperson. All such inquiries shall be referred to one of the designated spokesperson.

DETERMINING MATERIALITY

Material information is any information relating to the business and affairs of St. Augustine that results in, or would reasonably be expected to result in, a significant change in the market price or value of St. Augustine Securities, or that would reasonably be expected to have a significant influence on a reasonable investor's investment decisions, including, without limitation, the following:

- changes in corporate structure;
- changes in capital structure;
- changes in financial results;
- change in dividend policy;
- changes in business and operations, including changes in production and reserves;
- significant acquisitions and dispositions;
- changes in credit arrangements; and
- significant environmental or safety-related incidents.

It is the Committee's responsibility to determine what information is material in the context of St. Augustine's affairs by considering a number of factors in making judgments concerning the materiality of information. Factors include the nature of the information itself, the volatility of St. Augustine Securities, and prevailing market conditions.

PRINCIPLES OF DISCLOSURE OF MATERIAL INFORMATION

In complying with the requirement to disclose all material information under applicable laws and stock exchange rules, the Company will adhere to the following basic disclosure principles:

- material information will be immediately disclosed to the public via news release;
- disclosures must be factual and balanced, avoiding unnecessary details, exaggerated reports or promotional commentary;
- if the material information is to be released during trading hours on a stock exchange, CIRO ("Market Surveillance") must be contacted prior to the release of the news release, provided with a copy of the proposed news release, and advised of the proposed method and timing of dissemination. Market Surveillance will then determine whether trading in St. Augustine Securities should be halted pending release of the material information;
- if the material information is to be released after the close of the market, Market Surveillance must be contacted before trading opens the following trading day;
- in certain circumstances, the Committee may determine that such disclosure would be unduly detrimental to the Company (for example, if release of the information would prejudice negotiations in a corporate transaction), in which case the information will be kept confidential until the Committee determines it is appropriate to publicly disclose;
- where a material change is being kept confidential, the Company is under a duty to make sure that persons with knowledge of the material change or information have not made use of such information in purchasing or selling St. Augustine Securities. Such information should not be disclosed to any person or Company, except in the necessary course of business;

- disclosure must include any information the omission of which would make the rest of the disclosure misleading (half-truths are misleading);
- unfavourable material information must be disclosed as promptly and completely as favourable information;
- the Company's news release should contain enough detail to enable the media and investors to understand the substance and importance of the change it is disclosing;
- disclosure on the Company's website or LinkedIn profile does not constitute adequate disclosure of material information; and
- disclosure must be corrected immediately if the Company subsequently learns that earlier disclosure by the Company contained a material error at the time it was given.

NEWS RELEASES

Under Canadian securities laws, if a material change occurs in the affairs of the Company, St. Augustine must immediately issue and file a news release authorized by an executive officer disclosing the nature and substance of the change.

Once the Committee determines that a development is material, it will authorize the issuance of a news release, unless the Committee determines that such development should remain confidential for a period of time, in which case appropriate confidential filings will be made and controls of the undisclosed information will be instituted. Should material undisclosed information be inadvertently disclosed on a selective basis, St. Augustine will issue a news release as soon as practicable in order to fully disclose that information. Pending the public release of any such material information, the parties who have knowledge of the information should be advised that the information is material and has not been generally disclosed.

If the stock exchange upon which St. Augustine Securities are listed is open for trading at the time of a proposed announcement, St. Augustine will endeavour to provide prior notice of a news release announcing material information to Market Surveillance to determine if a trading halt is in order. If a news release announcing material information is issued outside of trading hours, St. Augustine will endeavour to provide notice to Market Surveillance before the news release is issued.

News releases containing guidance and financial results will be reviewed by the Board prior to issuance, and annual and interim financial results will be publicly released as soon as practicable following Board approval of the applicable press release and related financial statements.

News releases will be disseminated through an acceptable newswire service provider that facilitates simultaneous national distribution. Following dissemination via newswire, St. Augustine will post such news releases on its website.

MATERIAL CHANGE REPORTS

Under Canadian securities laws, if a material change occurs in the affairs of the Company, St. Augustine must as soon as practicable, and in any event within 10 days of the date on which the change occurs, file a material change report the appropriate securities commissions concerning the material change.

Where the decision has been made by the Board to keep a material change confidential, the Company will file a confidential material change report to be filed within 10 days of the material change with the appropriate securities commissions. When the Company files a confidential material change report, it must advise the securities regulators in writing that the report should remain confidential within 10 days of the filing of the initial report and every 10 days thereafter until the material change is publicly disclosed.

If the making of a document or contract constitutes a material change, then the Company must file a copy of the document or contract with the securities regulators not later than the time it files the material change report related thereto. If an executive officer of the Company has reasonable grounds to believe that disclosure of certain portions of the document or contract would be seriously prejudicial to the interests of the Company or violate confidentiality provisions, the Company may file the document or contract with those certain provisions omitted or marked so as to be unreadable.

RUMOURS

The Company does not comment, affirmatively or negatively, on rumours. This also applies to rumours on the Internet. The Company's spokespersons will respond consistently to any rumours by saying, "It is our policy not to comment on market rumours or speculation".

Should the stock exchange request that the Company make a definitive statement in response to a market rumour that is causing significant volatility in St. Augustine Securities, the Committee will consider the matter and decide whether to make a Policy exception. If a rumour is correct in whole or in part, the Company will immediately issue a news release disclosing the relevant material information.

CONFERENCE CALLS

Conference calls may be held to enable management to discuss quarterly earnings and major corporate developments. Conference calls shall be simultaneously accessible to all interested parties, whether they actively participate by telephone or merely listen by telephone or through an Internet webcast. Each such call will be preceded by a news release setting out relevant material information. At the beginning of the call, an authorized spokesperson of St. Augustine will provide appropriate cautionary language respecting any forward-looking information and will direct participants to publicly available documents containing assumptions, sensitivities, and full discussion of the risks and uncertainties. In advance of a conference call or industry conference call, to the extent practicable, St. Augustine will endeavour to script comments and responses to anticipated questions to identify material information that should be publicly disclosed and will limit comments and responses to non-material information and material information that has previously been publicly disclosed.

St. Augustine will provide advance notice of any conference call and webcast by issuing a news release, announcing the date and time and providing information on how interested parties may access the call and webcast. In addition, St. Augustine may invite analysts, institutional investors, the media and other interested parties to participate. The Company will make a recording of such conference calls available on its website.

The Committee may hold a debriefing meeting immediately after the conference call and if such debriefing uncovers selective disclosure of previously undisclosed material information, St. Augustine will disclose such information broadly via news release.

CONTACTS WITH ANALYSTS, INVESTORS AND THE MEDIA

Meetings with analysts and significant investors are an important element of St. Augustine's investor relations program. St. Augustine will meet with analysts and investors on an individual or small group basis as needed and will initiate contacts or respond to analyst and investor calls in accordance with this Policy.

Disclosure in individual or group meetings does not constitute adequate disclosure of information that is considered to be material non-public information. If St. Augustine intends to announce material information at an analyst or shareholder meeting or a press conference or conference call, the announcement must be preceded by a news release. Material prepared for any such meetings should be reviewed by a member of the Committee prior to the meeting with a view to eliminating inadvertent selective disclosure and verifying the accuracy of any such materials.

St. Augustine will provide only non-material information through individual and group meetings, in addition to regular publicly disclosed information. St. Augustine cannot alter the materiality of information by breaking down the information into smaller, non-material components.

Authorized spokespersons should keep notes of telephone conversations with analysts and investors and, where practicable, more than one representative of St. Augustine should be present at all individual and group meetings. A debriefing should be held after such meetings, and if such debriefing uncovers selective disclosure of previously undisclosed material information, St. Augustine will immediately disclose such information broadly via a news release.

REVIEWING ANALYST DRAFT REPORTS AND MODELS

It is St. Augustine's policy to review, upon request, analysts' draft research reports, or models to point out errors in factual content only based on publicly disclosed information. It is St. Augustine's policy, when an analyst inquires with respect to his or her estimates, to question an analyst's assumptions if the estimate is a significant outlier among the range of estimates or St. Augustine's published earnings guidance. St. Augustine will limit its comments in responding to such inquiries to non-material information. St. Augustine will not confirm, or attempt to influence, an analyst's opinions or conclusions and will not express comfort with the analyst's model and earnings estimates.

So as not to endorse an analyst's report or model, St. Augustine will provide its comments orally or will attach a disclaimer to written comments to indicate the report was reviewed only for factual accuracy.

DISTRIBUTING ANALYST REPORTS

Analyst reports are proprietary products of the analyst's firm and re-circulating an analyst's report may be viewed as an endorsement by St. Augustine of such report. Consequently, St. Augustine will not provide analyst reports through any means to persons outside of St. Augustine, including posting such information on its website. St. Augustine may post a complete list on its website, regardless of the recommendation, of

all the investment firms and analysts who provide research coverage on St. Augustine. If provided, such list will not include links to the analysts' or any other third party websites or publications. St. Augustine may distribute analyst reports internally to: (a) directors and senior officers; (b) St. Augustine's financial and professional advisors; and (c) employees of St. Augustine.

FORWARD-LOOKING INFORMATION

Should St. Augustine elect to disclose forward-looking information ("FLI") in continuous or timely disclosure documents, speeches, conference calls, etc., the following guidelines will be observed:

- if deemed material, the information will be broadly disseminated in accordance with this Policy;
- the information will only be published if there is a reasonable basis for drawing the conclusions or making the forecast and projection and will be clearly identified as forward-looking;
- St. Augustine will identify material assumptions used in the preparation of the FLI;
- the information will be accompanied by meaningful cautionary statements and statements proximate to such information that identify, in specific terms, the risks and uncertainties that may cause the actual results to differ materially from those projected in the statement, which may include a sensitivity analysis to indicate the extent to which different business conditions from the underlying assumptions may affect the actual outcome;
- public oral statements also require a cautionary statement that actual results could differ materially and a reference to material factors and assumptions that could cause actual results to differ materially and that such factors or assumptions are contained in a readily available document; and
- the information will be accompanied by a statement that disclaims St. Augustine's intention or obligation to update or revise the FLI, whether as a result of new information, future events or otherwise, except as required by applicable securities laws. Notwithstanding this disclaimer, should subsequent events prove past statements about current trends to be materially off target, St. Augustine may issue a news release explaining the reasons for the difference; in such cases, St. Augustine will update its guidance on the anticipated impact on production (or other key metrics).

CORRECTING DISCLOSURE

Any St. Augustine Member who believes that any public disclosure of the Company, including any documents released by St. Augustine or any public oral statements, contains a misrepresentation, shall promptly notify a member of the Committee concerning such misrepresentation. In turn, the Committee member shall inform the Board, and subject to the Board determining that a document released by St. Augustine contains a misrepresentation shall take appropriate steps to correct such misrepresentation promptly and, in any event, within two business days. Relatedly, any St. Augustine Member who has concerns about whether or not information is undisclosed material information should contact a member of the Committee regarding such matter.

QUIET PERIODS

In order to avoid the potential for selective disclosure or even the perception or appearance of selective disclosure, the Company will observe a quarterly quiet period, during which the Company will not initiate or participate in any meetings or telephone contacts with analysts and investors and no earnings guidance will be provided to anyone, other than responding to unsolicited inquiries concerning factual matters. The quiet period commences on the business on the seventh calendar day preceding the release of the quarterly or annual financial results and ends on the day of release of St. Augustine's quarterly and annual financial results.

Additional quiet periods may be established from time to time by St. Augustine as a result of special circumstances relating to St. Augustine. The existence of a special purpose quiet period will be communicated by a means approved by the Committee (which may include email).

If St. Augustine is invited to participate, during a quiet period, in investment meetings or conferences organized by others, the Committee will determine, on a case-by-case basis, if it is advisable to accept these invitations. If accepted, caution will be exercised to avoid selective disclosure of any material undisclosed information.

MAINTAINING CONFIDENTIALITY

Any St. Augustine Member privy to Privileged Information is prohibited from communicating such information to anyone else, unless it is necessary to do so in the course of business. Efforts will be made to limit access to Privileged Information to only those St. Augustine Members who need to know such Privileged Information, and those persons will be advised that the Privileged Information is to be kept confidential.

Outside parties privy to undisclosed material information concerning St. Augustine must be told that they must not divulge such information to anyone else, other than in the necessary course of business, and that they may not trade in St. Augustine Securities until the information is publicly disclosed.

In order to prevent misuse or inadvertent disclosure of Privileged Information, the following procedures should be observed at all times:

- documents and files containing Privileged Information should be kept in a safe place, with access restricted to St. Augustine Members who "need to know" that information in the necessary course of business and code names should be used if necessary;
- confidential matters should not be discussed in places where the discussion may be overheard, such as elevators, hallways, restaurants, airplanes or taxis;
- confidential matters should not be discussed on cell phones or other wireless devices;
- confidential matters should not be read or displayed in public places and should not be discarded where others can retrieve them;
- St. Augustine Members employees must ensure they maintain the confidentiality of Privileged Information in their possession outside of the office as well as inside the office;

- transmission of documents by electronic means, such as by fax, e-mail, or directly from one computer to another, should be made only where it is reasonable to believe that the transmission can be made and received under secure conditions;
- unnecessary copying of confidential documents should be avoided and documents containing Privileged Information should be promptly removed from conference rooms and work areas after meetings have concluded. Extra copies of confidential documents should be shredded or otherwise destroyed; and
- access to confidential electronic data should be restricted through the use of passwords.

RESPONSIBILITY FOR ELECTRONIC COMMUNICATION

This Policy applies to electronic communications, and as such, St. Augustine Members responsible for written and oral public disclosures are also responsible for electronic communications. St. Augustine will continuously update the “investors” section of its website and will monitor all information placed on the website for accuracy, completeness, currency, and compliance with relevant securities laws.

Investor relations material will be contained within a separate section of St. Augustine’s website and will include a notice to the reader that the information posted was considered accurate at the time of posting, but may be superseded by subsequent disclosures or become inaccurate over time. All data posted to the website, including text and audio-visual material, will identify the date such material was issued. Any material changes in information will be updated as soon as possible.

Disclosure on St. Augustine’s website alone does not constitute adequate disclosure of information that is considered material non-public information. Any disclosures of material information on the website will be preceded by the issuance of a news release. In an effort to facilitate investor access to disclosure and information, St. Augustine will endeavour to post all SEDAR+ file documents to its websites concurrently. Where practicable, St. Augustine will also endeavour to post on its website all supplemental information as given to analysts, institutional investors and other market professionals such as data books, fax sheets, slides of investor presentations and other relevant materials. Responses to electronic inquiries will be provided as appropriate.

Approved by the Board of Directors on November 17, 2025.