
INSIDER TRADING POLICY

1. PURPOSE

- 1.1 As a Canadian public company whose shares are traded on a public stock exchange, the trading of shares of Big Ridge Gold Corp. (the “Company”) is subject to the rules of Canadian securities legislation and the rules and policies of the subject Canadian stock exchange. One of the main principles underlying the regulation of trading securities of a Canadian public company is the effort to preserve confidence in the fairness and integrity of the securities market within Canadian securities laws and regulations. Thus, directors, officers, and employees of the Company and their families, as well as consultants, contractors, and any others who have access to undisclosed material information through business relationships with the Company are prohibited by securities rules and regulations from trading the Company’s securities when in possession of undisclosed material information. To prevent even the appearance of improper trading or tipping, the Company has adopted this Insider Trading Policy (the “Policy”).
- 1.2 Compliance with insider trading and/or tipping laws not only are ethically and legally required, but are a condition of employment with the Company.

2. APPLICATION

- 2.1.1 This Policy applies to all directors, officers and employees of the Company; any family member or other person living in the household or a dependant child of any of the aforementioned individuals; partnerships, trusts, corporations, RRSPs and similar entities over which any of the aforementioned individuals exercise control or direction; any others who are designated as Insiders by the Disclosure Committee; consultants, contractors, and any others who may have access to undisclosed material information (collectively, “Restricted Persons”).
- 2.1.2 This Policy applies to any and all transactions involving the Company’s securities including shares, stock options, deferred share units, restricted share units, warrants, preferred stock, convertible debentures, exchange-traded options, derivatives, and any other security instrument traded on a public exchange (collectively, “Company Securities”). In addition, the Policy applies to private transactions, to pledges to secure a loan or margin account, and to charitable donations of Company Securities.

3. MATERIAL NON-PUBLIC INFORMATION AND BLACKOUT PERIODS

- 3.1 The Disclosure Committee will determine whether certain non-public information is material as defined in Section 4.1 of the Disclosure Policy.
- 3.2 Restricted Persons shall be informed, in most cases via email, of time periods when they cannot trade the Company's Securities (the "Blackout Period") by an executive chosen by the Disclosure Committee (the "Designated Officer").
- 3.3 Restricted Persons shall neither directly nor indirectly engage in any trades, especially hedging of any sort, of the Company's Securities during a Blackout Period or during the 48 hours prior to and immediately after the public disclosure relating to the Blackout Period; depending on the nature of the material information, the Disclosure Committee can extend the time of any Blackout Period.
- 3.4 If no public disclosure of material information is imminent, the Disclosure Committee will decide when the Blackout Period will apply.
- 3.5 When the Company is involved with an undisclosed material transaction with another entity, each Restricted Person is considered to be in a special relationship with such other entity and therefore, in addition to a Blackout Period for the Company's Securities, cannot trade in securities of such other entity where material non-public information about such other entity was obtained as a result of such Restricted Person's service as a director, officer, or employee of the Company or as otherwise defined in Section 2.1.1.
- 3.6 No Insider shall disclose material non-public information to any other person where such information may be used by such person by trading in the securities of the Company, nor shall such Insider make recommendations or express opinions on the basis of material non-public information as to trading in securities of the Company, all of which constitute "Tipping".
- 3.7 Restricted Persons are prohibited from disclosing any material non-public information about the Company to any other person except with the consent of a Designated Officer.

4. PRE-CLEARANCE OF TRADES

- 4.1 Before initiating any trades in the Company's securities, including the exercise of stock options or other long-term incentive grants, all of the Company's Restricted Persons shall be required to submit a "Notice of Intention to Trade in Securities" (see Schedule "B") to the Designated Officer, who will duly inform the other members of the Disclosure Committee.

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- 4.2 If it is unclear that the proposed transaction will not contravene applicable insider trading restrictions and the individual is not privy to material non-public information, permission to complete the transaction shall be denied.
- 4.3 If approval for the proposed transaction is granted, that approval will be effective for five trading days, unless revoked prior to that time.
- 4.4 Notwithstanding the foregoing, an employee, consultant, or contractor to the Company who is not in possession of material non-public information may trade in securities of the Company during a trading Blackout Period with the prior written consent and in the sole discretion of a Designated Officer, which consent may be conditional upon prior receipt by the Company of such written representations that the Designated Officer may require. Such permission to trade in securities of the Company during a Blackout Period will not apply to directors or officers and will only be granted where permitted by applicable laws.

5. OBLIGATIONS OF INSIDERS

- 5.1 All Insiders, as defined by the appropriate securities legislation, must file insider reports with the appropriate securities' regulatory authority if and when Company securities are bought, sold, or awarded.

6. INAPPROPRIATE TRADING ACTIVITY

- 6.1 It is inappropriate for a Restricted Person to directly or indirectly engage in any activity that (i) is or appears to be contrary to the interests of the Company; (ii) that creates or may create a false or misleading appearance of trading activity in any of the Company's securities; (iii) has the effect of setting an artificial price for those securities; or (iv) otherwise interferes with the free determination by the market of the market price for those securities. While it is not possible to list all types of trading activities prohibited by the foregoing, such activities could include short selling, securities lending, and trading in puts or calls.

7. PENALTIES

- 7.1 The penalties and civil liability that may be incurred if insider trading laws are violated are substantial. In Canada, penalties include possible imprisonment for up to five years and fines up to the greater of \$5 million and three times the profit made or loss avoided.
- 7.2 Restricted Persons may also be liable for improper transactions, or Tipping, by any person to whom they have disclosed material non-public information about the Company or to whom they have made recommendations or expressed opinions on the basis of such information. Securities regulators and stock exchanges employ sophisticated electronic surveillance

techniques to detect insider trading and have imposed large penalties even when the disclosing person did not profit from the trading.

7.3 Failure to comply with this Policy may also result in disciplinary action against you by the Company, including termination with cause. The onus of complying with this Policy and applicable laws is on each individual and you are expected to be familiar with this Policy and applicable laws, and to fully comply with them.

8. PUBLICATION ON WEBSITE

8.1 This Mandate will be posted on the Company's website: www.bigridgegold.com.

Approved - Corporate Governance, Compensation, and Nominating Committee: May 26, 2021

Approved – Board of Directors June 7, 2021