



Graphene Manufacturing Group

## Disclosure, Confidentiality and Insider Trading Policy

Graphene Manufacturing Group (GMG) is committed to ethical business conduct and providing investor confidence including by ensuring it complies with its legal obligations, specifically securities laws and stock exchange rules.

It is GMG's intention that access to confidential information will be limited to only essential personnel and those persons have fully understood the liabilities regarding disclosure and insider trading. GMG seeks to ensure that:

- Information which is material in nature is assessed and controlled in accordance with applicable securities laws
- Communications are disseminated broadly and comply with legal requirements
- Information is shared with investing public which is timely, factual and accurate
- Disclosures include financial and non financial information
- The Board is responsible for pre-approving all external communications
- Disclosures will be consistent among varying audiences
- Favourable and unfavourable material will be disclosed in an equal timely manner
- Individuals in receipt of confidential information do not communicate externally or trade in GMG shares prior to seeking approval from CEO or CFO
- The board will also publish and clearly communicate Trading Black Out periods
- Employees, officers and directors will not comment on rumours
- Forward looking statements are identified and appropriately cautioned by the spokesperson
- Appropriate record keeping of all material public information is maintained

This policy, related standards and procedures applies to disclosures in documents, management meetings records, written statements, company reports, news releases, shareholder communications, marketing publications, other electronic communications as well as oral communications made in meetings, with analysts, investors, speeches, and other oral communications.

This policy extends to all directors, officers, employees and contractors of GMG and those authorised to speak on its behalf, and all other insiders. Implementation of this policy is supported by a Disclosure, Confidentiality and Insider Trading Procedure and Awareness Program.

Craig Nicol  
Founder and Managing Director  
Graphene Manufacturing Group  
March 2021