Code of Conduct and Ethics Policy

INTRODUCTION

West Red Lake Gold Mines Ltd. (the **"Company")** requires that its directors, officers, employees, consultants and other individuals representing the Company ("**Representatives**") maintain the highest level of integrity in their dealings with each other and with the public on behalf of the Company. This Code of Conduct and Ethics Policy (the "**Policy**") applies to everyone at the Company at all times, including Representatives regardless of their position in our organization.

References to the Company in this Policy include all of its subsidiaries.

This Policy reflects a commitment to a culture of honesty, integrity and accountability and outlines the basic principles and policies with which everyone at the Company is expected to comply.

The Company requires the highest standards of professional and ethical conduct from all Representatives. A reputation for honesty and integrity is important for the success of our business. No one at the Company will be permitted to achieve results through violations of laws or regulations, or through unscrupulous dealings.

The Company aims for business practices to be compatible with, and sensitive to, the economic and social priorities of each location in which we operate. Although customs vary from country to country and standards of ethics may vary in different business environments, honesty and integrity must always characterize business activity.

In addition to following this Policy, you are expected to seek guidance in any case where there is a question about compliance with both the letter and spirit of our policies and applicable laws. This Policy is not a complete code of conduct. It sets forth general principles and does not supersede the specific policies and procedures that are in effect, such as the Company's Disclosure, Confidentiality & Insider Trading Policy (the "**Disclosure Policy**") or other policies that are in effect from time to time.

This Policy will be reviewed periodically by the Board of Directors of the Company (the "**Board**") and supplemented as required from time to time.

Copies of the Code of Conduct are available on the Company's website at: www.westredlakegold.com and can also be obtained from the Corporate Secretary or any of the Executive management members.

SPECIFICS OF POLICY

1. COMPLIANCE WITH LAWS, RULES AND REGULATIONS

The Company and Representatives have a responsibility to monitor all legal boundaries and to comply with all applicable laws and regulations in all of our activities worldwide. Compliance with both the letter and spirit of all laws, rules and regulations applicable to our business is important for our reputation and continued success. We must respect and obey the laws of the cities, provinces and countries in which we operate and avoid even the appearance of impropriety. Individuals who fail to comply with this Policy and applicable laws will be subject to disciplinary measures, up to and including discharge from the Company.

2. CONFLICTS OF INTEREST

A conflict of interest occurs when an individual's private interest conflicts, or appears to conflict, in any way with the interests of the Company. A conflict of interest could arise where:

- an individual's personal interests conflict, or appear to conflict, in any way, with the interests of the Company;
- an individual takes action for his or her direct or indirect benefit or the direct or indirect benefit of a third party that is in conflict with the interests of the Company; or
- an individual, or a member of his or her family, receives improper personal benefits as a result of the individual's position in the Company.

Activities that could give rise to conflicts of interest are prohibited unless specifically approved in advance by the Board or, in the case of an employee or consultant, a member of senior management of the Company. Where a conflict involves a Board member (i.e., where a Board member has an interest in a material contract or material transaction involving the Company), the Board member involved will be required to disclose his or her interest to the Board and refrain from voting at the Board meeting of the Company considering such contract or transaction in accordance with applicable law.

It is not always easy to determine whether a conflict of interest exists, so any potential conflicts of interest should be reported immediately to a member of senior management who is independent of the potential conflict and who will assess the issue with, if necessary, the advice of legal counsel. For unresolved potential conflicts involving any employee or consultant, or where a member of senior management or a board member is involved in a potential conflict, the issue should be referred to the Board (assisted by the Corporate Governance & Nominating Committee and legal counsel as necessary).

3. CORPORATE OPPORTUNITIES

Representatives owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises and are prohibited from taking, for themselves personally, opportunities that arise through the use of corporate property, information or position and from using corporate property, information or position for personal gain, except where the Board has, after receiving the necessary information concerning such opportunity and receiving advice of legal counsel, has elected not to avail itself of the opportunity in compliance with applicable corporate law. Any director interested in a corporate opportunity being considered by the Board shall refrain from voting at the Board meeting considering such opportunity.

If an employee or consultant has any doubt as to the whether any activity they are contemplating violates this requirement, they must refer the issue to a member of senior management who will assess the issue with, if necessary, the advice of legal counsel.

4. CONFIDENTIALITY

Representatives must preserve and protect the confidentiality of information entrusted to them by the Company or that otherwise comes into their possession in the course of their employment, except when disclosure is expressly authorized or legally mandated.

The obligation to preserve confidential information continues even after you leave the Company. The Company's Disclosure, Confidentiality & Insider Trading Policy sets forth certain specific obligations in respect of confidentiality.

Confidential information includes all non-public information that may be of use to competitors, or harmful to the Company or its customers, if disclosed. It also includes information that suppliers and customers have entrusted to us.

5. PROTECTION AND PROPER USE OF COMPANY ASSETS

Representatives should endeavour to protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's operations. Any suspected incidents of fraud or theft should be immediately reported to an individual's supervisor or to a member of senior management for investigation.

Company assets, such as funds, products or computers, equipment and data may only be used for legitimate business purposes or other purposes approved by management. Company assets may never be used for illegal purposes.

The obligation to protect Company assets includes proprietary information. Proprietary information includes any information that is not generally known to the public or would be helpful to our competitors. Examples of proprietary information are intellectual property, business and marketing plans, exploration results and employee information. The obligation to preserve proprietary information continues even after you leave the Company.

6. INSIDER TRADING

Insider trading is unethical and illegal. We are prohibited from trading in securities of any company while in possession of material non-public information regarding that company. This includes the Company or any other company. It is also illegal to "tip" or pass on inside information to any other person who might make an investment decision based on that information or pass the information on further. The Company's Disclosure**,** Confidentiality & Insider Trading Policy sets forth your obligations in respect of trading in the Company's securities.

7. FAIR DEALING

Representatives should endeavour to deal fairly with the Company's customers, suppliers, competitors and the other employees of the Company. No one at the Company should take unfair advantage of anyone through illegal conduct, concealment, manipulation, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

8. COMPLIANCE WITH ENVIRONMENTAL LAWS

The Company is sensitive to the environmental, health and safety consequences of its operations. Accordingly, the Company's policy is to comply with all applicable environmental laws and regulations within all jurisdictions in which it operates. If any employee or consultant has any doubt as to the applicability or meaning of a particular environmental, health or safety regulation, he or she should immediately discuss the matter with his or her supervisor or with a member of the Company's senior management.

9. EQUAL OPPORTUNITY

We value the diversity of our employees and are committed to providing equal opportunity in all aspects of employment.

10. SAFETY AND HEALTH

Representatives are all responsible for maintaining a safe workplace by following safety and health rules and practices. The Company is committed to keeping its workplaces free from hazards. Please report any accidents, injuries, unsafe equipment, practices or conditions immediately to a supervisor or other designated person. In order to protect the safety of all employees, employees must report to work free from the influence of any substance that could prevent them from conducting work activities safely and effectively.

11. FINANCIAL AND BUSINESS DISCLOSURE AND ACCURACY OF COMPANY RECORDS AND REPORTING

Honest and accurate recording and reporting of information is critical to our ability to make responsible business decisions and to meet our reporting obligations to our stakeholders. This includes both the Company's financial reporting and ongoing disclosure requirements under applicable securities and stock exchange requirements. The Company's accounting and other records are relied upon to produce reports for the Company's management, shareholders, creditors, governmental agencies and others.

Full, fair, accurate, timely and understandable disclosure in the reports and other documents that are filed with, or submitted to, securities regulators and stock exchanges and in our other public communications is critical to maintain our good reputation, to comply with obligations under the securities laws and to meet the expectations of shareholders and other members of the investment community. In preparing such reports and documents and other public communications, the following guidelines should be adhered to:

- all accounting records, and the reports produced from such records, must be in accordance with all applicable laws;
- all accounting records must fairly and accurately reflect the transactions or occurrences to which they relate;
- all accounting records must fairly and accurately reflect in reasonable detail the Company's assets, liabilities, revenues and expenses;
- no accounting records should contain any false or intentionally misleading entries;
- no transactions should be intentionally misclassified as to accounts, departments or accounting periods;

- all transactions must be supported by accurate documentation in reasonable detail and recorded in the proper account and in the proper accounting period;

- no information should be concealed from the internal auditors or the independent auditors; and

- compliance with the Company's system of internal controls is required.

If any Representative has concerns or complaints regarding accounting or auditing issues, they are encouraged to submit those concerns to a member of the Audit Committee.

Business records and communications often become public through legal or regulatory investigations or the media. Representatives should avoid exaggeration, derogatory remarks, legal conclusions or inappropriate characterizations of people and companies. This applies to communications of all kinds, including e-mail and informal notes or interoffice memos.

Violation of these policies may result in disciplinary actions up to and including discharge from the Company.

12. USE OF E-MAIL AND INTERNET SERVICES

E-Mail systems and Internet services are provided to help us do work. Incidental and occasional personal use is permitted, but shall not interfere with an individual's employment duties. You should not access, send or download any information that could be insulting or offensive to another person, such as sexually explicit messages, ethnic or racial slurs, or messages that could be viewed as harassment.

Your messages (including voice mail) and computer information are considered the property of the Company and you should not have any expectation of privacy. Unless prohibited by law, the Company reserves the right to access and disclose this information as necessary for business purposes. Use good judgement, and do not access, send messages or store any information that you would not want to be seen or heard by other individuals.

Violation of these policies may result in disciplinary actions up to and including discharge from the Company.

13. GIFTS AND ENTERTAINMENT

Business gifts and entertainment are customary courtesies designed to build goodwill among business partners. In some cultures, they play an important role in business relationships. However, a problem may arise when such courtesies compromise, or appear to compromise, the Company's ability to make objective and fair business decisions. The same rules apply to all Representatives offering gifts to any other business associates, private persons or foreign public officials.

Therefore, providing or receiving gifts with the intention or appearance of improperly influencing a foreign public official or private person, or being improperly influenced by another, to obtain or convey a business advantage, or for any other corrupt purpose, is strictly prohibited. It is important to recognize that even when there is no intent to convey a bribe; such intent may be inferred from the surrounding circumstances.

Also, under no circumstance shall any Representative make, offer, promise, or authorize any payment or gift in violation of local law in any country.

14. PAYMENTS TO DOMESTIC AND FOREIGN OFFICIALS

Employees and officers of the Company must comply with all applicable laws prohibiting improper payments to domestic and foreign officials, including the *Corruption of Foreign Public Officials Act* (Canada) (the "**Act**").

The Act makes it illegal for any person, in order to obtain or retain an advantage in the course of business, directly or indirectly, to offer or agree to give or offer a loan, reward, advantage or benefit of any kind to a foreign public official or to any person for the benefit of a public official. Foreign public officials include persons holding a legislative, administrative or judicial position of a foreign state, persons who perform public duties or functions for a foreign state (such as persons employed by boards, commissions or government corporations), officials and agents of international organizations, foreign political parties and candidates for office.

A facilitation payment is a small bribe, also called a 'facilitating', 'speed' or 'grease' payment, made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement. Under CFPOA and the Company's policies, facilitated payments are prohibited. If any Representative has any questions about the application of this policy to a particular situation, please report to the Chief Executive Officer or such other senior officer as may be designated by the Company from time to time who, with the advice of counsel as necessary, will determine acceptability from both a legal and a corporate policy point of view, and any appropriate accounting treatment and disclosures which are applicable to the particular situation.

Violation of the Act is a criminal offence, subjecting the Company to substantial fines and penalties and any officer, director, consultant, or employee acting on behalf of the Company to imprisonment and fines. Violation of this policy may result in disciplinary actions up to and including discharge from the Company.

15. REPORTING OF ANY ILLEGAL OR UNETHICAL BEHAVIOUR

The Company has a strong commitment to conduct business in a lawful and ethical manner. Representatives are encouraged to report violations of laws, rules, regulations or this Policy to their supervisor or member of senior management. The Company prohibits retaliatory action against anyone who, in good faith, reports a possible violation. It is unacceptable to file a report knowing it to be false.

16. AMENDMENT, MODIFICATION AND WAIVERS OF THE CODE OF BUSINESS CONDUCT AND ETHICS

The Policy may be amended or modified by the Board and waivers may be granted by the Corporate Governance & Nominating Committee or a vote of the independent directors of the Board, subject to disclosure and other provisions of applicable securities legislation and stock exchange requirements.

17. COMPLIANCE PROCEDURES

This Policy cannot, and is not intended to, address all of the situations you may encounter. There will be occasions where you are confronted by circumstances not covered by policy or procedure and where you must make a judgement as to the appropriate course of action. In those circumstances or if you have any questions concerning your obligations under this Policy we encourage you to use your common sense, and to contact your supervisor or a member of senior management for guidance. Senior management or directors are encouraged to consult with the

Chief Executive Officer, the Corporate Secretary, or such other senior officer of the Company as may be designated by the Company from time to time.

If you fail to comply with this Policy or applicable laws, rules or regulations you will be subject to disciplinary measures, up to and including discharge from the Company. Violations of this Policy may also constitute violations of law and may result in civil or criminal penalties for you, your supervisors and/or the Company.

Representatives are expected to report all violations of this Policy promptly to a supervisor or to the Chief Executive Officer, Chief Financial Officer or such other senior officer of the Company who may be designated from time to time.

The Company has adopted a Whistleblower Policy which allows directors, officers, employees and representatives of the Company and its subsidiaries to make complaints and report concerns on a confidential basis to the Chair of the Audit Committee. A copy of this policy is available on the Company's website at www.westredlake.com or may be obtained from the Company's Corporate Secretary. Persons wishing to make complaints or report concerns on a confidential basis are encouraged to make a complaint through the Company's online whistleblower platform to the Chair of the Audit Committee in accordance with the Whistleblower Policy.

APPROVAL OF THE POLICY

The Corporate Governance and Nominating Committee will review the Company's compliance with this Policy at least annually, and more frequently as required.

Approved by the Board of Directors

Adopted: March 27, 2024
Reviewed: April 21, 2026

COMPLIANCE CERTIFICATE

The Company's Policies are important to prevent violations of applicable securities laws and to avoid situations which could damage the Company's reputation for integrity and ethical conduct – assets of immeasurable value to the Company.

The Company Policies assist the Company, together with its directors, officers, employees, consultants and contractors to conduct its business in an honest and ethical manner, reflecting the highest standards of integrity and in compliance with all relevant laws and regulations applicable to it.

Please acknowledge that you have read, understand and will comply with the Company's policies which have either been sent to you via email or have been made available to you, by signing this acknowledgment and returning it to the Company's Corporate Secretary. Please contact the Corporate Secretary if you require hard copies of the policies. I hereby acknowledge that I have read, understand, and will comply with the following Company Policies:

- Code of Conduct and Ethics Policy
- Whistleblower Policy
- Disclosure, Confidentiality and Insider Trading Policy
- Diversity and Inclusion Policy
- Workplace Bullying and Harassment Policy

I understand that a violation of these policies may result in severe consequences, which could include internal disciplinary action and termination of employment or consulting arrangements.

Acknowledged and agreed by:

By: _____
Signature

Name: _____
Please Print

Job Title: _____

Date: _____