

## **FORT TECHNOLOGY INC.**

### **CORPORATE COMMUNICATIONS POLICY**

#### **Purpose and Scope**

As a public company, the goal of Fort Technology Inc. (together with its subsidiaries, the “Company”) is to communicate with the investment community, its shareholders, the media, and members of the public regarding the Company’s business and affairs, including financial results, in order to build relationships and to share information with these constituencies about the Company, its products under development and its operations.

The objective of this Corporate Communications Policy (the “Policy”) is to ensure that communications to the public by or on behalf of the Company are:

- factual, complete, accurate, balanced, transparent, consistent and credible;
- disseminated on a timely basis and in a manner reasonably designed to provide broad, non-exclusionary distribution of information to the public; and

made in a manner that complies with the rules of the Nasdaq Stock Market, Regulation FD, if applicable, TSX Venture Exchange (“TSXV”) timely disclosure policies and other applicable law.

This Policy applies to all directors, officers, and employees of the Company, as well as agents and consultants of the Company who regularly communicate with the public. If you are in doubt as to whether a person is covered by this Policy, then either (i) assume such person is covered by this Policy, or (ii) contact the Company’s Chief Financial Officer (the “Compliance Officer”).

Any questions in relation to compliance, enforcement, modification or deviation from this Policy should be directed to the Compliance Officer, who may enact additional policies and procedures designed to supplement or ensure compliance with this Policy.

#### **Public Disclosures Covered by Policy**

This Policy applies to all communications by the Company to the investment community, its shareholders, the media, and members of the public (“Public Disclosures”).

For purposes of this Policy, examples of a Public Disclosure include, without limitation, any of the following:

- press releases;
- corporate presentations;
- speeches by management;
- one-on-one or group meetings with potential investors, shareholders, securities brokers and dealers, analysts, financial institutions, and non-employee family members of directors, officers, and employees of the Company;
- statements made at industry or investor conferences;

- materials distributed at industry or investor meetings;
- statements made in meetings with the investment community;
- statements made in meetings with shareholders, including the Company’s annual general meeting of shareholders or any special meeting of shareholders;
- conference and direct calls with analysts and shareholders;
- interviews with the media or others;
- posters or papers presented at conferences, including medical or scientific conferences; and
- press conferences.

### **Authorized Spokesperson**

Only the following persons (the “Authorized Spokespersons”) are authorized to communicate on behalf of the Company with (including responding to inquiries from) the investment community (e.g., securities analysts, institutional investors, investment advisers, brokers and dealers), shareholders, the media and members of the public:

- Chief Executive Officer;
- Chief Financial Officer;
- Any person employed or retained by the Company to perform investor relations services.

Directors, officers, employees, agents, and consultants of the Company, other than an Authorized Spokesperson, shall not respond to inquiries from the investment community, shareholders, the media, or members of the public unless specifically requested to do so by an Authorized Spokesperson.

All calls or inquiries from the investment community, shareholders, the media, or members of the public shall be referred to an Authorized Spokesperson.

Casual conversations with members of the investment community, shareholders, or others regarding the Company or its prospects must not include discussion of any previously undisclosed information regarding the Company.

### **Review Procedures**

Directors, officers, employees, agents, and consultants of the Company, including the Authorized Spokespersons, shall, to the extent possible, ensure that the Compliance Officer is informed about any Public Disclosures in order to facilitate the Company’s compliance with legal and regulatory requirements applicable to the Company’s external communications.

### **Meetings with Analysts and Investors**

The Company’s Authorized Spokespersons may respond to inquiries from, or meet with, securities analysts and investors in nonpublic forums. Such interactions serve a legitimate purpose

by assisting analysts and investors in gaining a better understanding of the Company and providing investors with the opportunity to meet and assess management. However, the Company shall not disclose any material nonpublic information in those nonpublic interactions.

### **Reviewing Analyst Reports**

Any review of an analyst report may only be done by an Authorized Spokesperson. Analyst reports and models may only be reviewed to correct errors that can be corrected by referring to publicly available, historical, factual information or to correct any mathematical errors. No other analyst feedback or guidance on analysts' models or forward-looking statements may be communicated to an analyst.

A written record should be kept of any review provided with respect to an analyst's report. Such reports and comments must be promptly forwarded to the Compliance Officer.

***No director, officer, employee, agent, or consultant of the Company shall retain, contract with, or agree to compensate any entity where the purpose is or may appear to be the preparation on behalf of the Company of an analyst report.***

### **Distribution of Analysts' Reports.**

The Company should avoid activities which may be interpreted as ratification of a particular analyst's research or projections, including a general dissemination of analysts' reports.

Under no circumstances will the Company distribute analysts' reports to the public. Instead, the Company may post on the investor relations section of its website the names and firms of analysts who are currently covering the Company.

### **No Comment Policy on Rumors and Undisclosed Material Events**

Until the Company has made appropriate public disclosure, including in compliance with applicable regulatory and stock exchange requirements, or is otherwise advised by the Compliance Officer or the Company's legal counsel that advises the Company on Public Disclosures ("Disclosure Counsel"), no director, officer, employee, agent, and consultant may comment on or substantively respond to inquiries or rumors concerning:

- specific prospective developments or transactions involving the Company (including without limitation inquiries or rumors relating to the status of discussions, or the Company's plans, with respect to an offering of the Company's securities or an acquisition of or by the Company);
- developments regarding the Company's products (including without limitation marketing or regulatory matters);
- projections of, or guidance regarding, future financial performance by the Company (including without limitation reaffirmation of any previously provided projections or earnings guidance); and

- any other matter of material importance to Company.

The Company's general policy is to respond consistently to questions about rumors in the following manner: "*It is our policy not to comment about market rumors or speculation.*" In addition, it is the Company's general policy not to issue press releases that deny or confirm market rumors.

Inquiries about rumors or unannounced corporate events should be referred to the Compliance Officer or Disclosure Counsel.

### **Disclosure of Material Nonpublic Information**

Material, non-public information is any information (positive or negative) that is not generally known to the public and which, if publicly known, would likely affect either the market price of the Company's securities or a person's decision to buy, sell or hold the Company's securities.

No director, officer, employee, agent and consultant of the Company will discuss or otherwise disclose material non-public information pertaining to the Company with any person except in accordance with the provisions of this Policy and in compliance with applicable securities laws and stock exchange requirements.

If disclosure to third party recipients is required, in the necessary course of business, such director, officer, employee, agent, or consultant of the Company will ensure that adequate measures are taken to protect the confidentiality of the information to be disclosed, such as the execution of a written confidentiality agreement with the third party recipient of such information. Each such confidentiality agreement will be subject to review by the Company's Compliance Officer or Disclosure Counsel.

The Company shall make disclosures of material, non-public information only:

- by means of a press release which is distributed in a manner reasonably designed to ensure wide dissemination in compliance with applicable securities laws and stock exchange requirements for timely disclosure; or
- pursuant to a confidentiality agreement or by such other means which, in any case, after consultation with the Compliance Officer or Disclosure Counsel, is believed to be in compliance with Regulation FD, if applicable, and other applicable laws.

The Company shall also make all necessary and applicable regulatory filings and notifications in relation to a press release that has been disseminated.

If material, non-public information is disclosed otherwise than in accordance with the foregoing, the Company shall, upon advice of the Compliance Officer or Disclosure Counsel, issue a press release and initiate all necessary and applicable regulatory filings and notifications, including in relation to a trading halt pending the issuance of a press release subject to applicable stock exchange policies, as soon as reasonably possible.

## **Forward-Looking Statements/Misleading Statements**

All written or oral communications containing forward-looking information, shall be accompanied by the forward-looking statements disclaimer identifying important factors that could cause actual results to differ materially from those projected in the communication.

In addition, all due care shall be taken to avoid making any communication that either contains a statement that might be considered to be misleading or that omits to state a material fact necessary to make the statement.

## **Company Website and Social Media Accounts**

The Company shall monitor and periodically update its website so that the information on its website is accurate and not misleading. No director, officer, employee, agent or consultant of the Company will participate in, host or link to chat rooms or bulletin boards or discuss Company matters on such.

## **Compliance with Laws**

### Regulation FD.

This Policy is intended to be applied in a manner that is consistent with the requirements of Regulation FD, to the extent applicable.

### Applicable Laws.

All public disclosures by the Company shall be made in compliance with all applicable laws, including without limitation Ontario securities laws, the antifraud provisions of Rule 10b-5 under the Securities Exchange Act of 1934 and Regulation G and Item 10(e) of Regulation S-K (concerning non-GAAP financial measures).

### Stock Exchange Requirements.

The Company shall comply with the rules of the Nasdaq Stock Market and the TSXV with respect to providing advance notice of significant public announcements to such exchange. In addition, notwithstanding any provision of this Policy, the Authorized Spokespersons are authorized to make such disclosures as may be required to satisfy the rules, policies and regulations of the Nasdaq Stock Market and the TSXV, after consultation with the Compliance Officer or, if the Compliance Officer is not available, Disclosure Counsel.

### Insider Trading.

This Policy is in addition to the Company's Securities Trading Policy.

### Labor Laws.

Failure by any employee to comply with this Policy may result in disciplinary action up to

and including termination of employment. To the extent required by applicable law (including, without limitation, any federal, provincial, state or local law of the United States or the Province of Ontario, Canada), nothing herein shall be deemed to prohibit Company employees from engaging in activities protected by such laws.

#### Public Offerings.

Notwithstanding any provision of this Policy, the Authorized Spokespersons are authorized, in connection with a public offering of securities by the Company, to make such disclosures (including through participation in road show meetings) as they may, in consultation with the Compliance Officer or if the Compliance Officer is not available, Disclosure Counsel, deem necessary or appropriate provided such disclosure is in compliance with applicable regulatory disclosure standards and requirements.

#### Fiduciary Duties.

Nothing in this Policy shall be construed to prohibit or restrict any member of the Company's Board of Directors from acting in a manner required to satisfy his or her fiduciary duties.

#### Exceptions.

Nothing in this Policy is intended to limit the ability of any Company employee or consultant to make good faith disclosures to, or initiate or participate in communications with, the U.S. Equal Employment Opportunity Commission, the National Labor Relations Board, the Occupational Safety and Health Commission, the SEC or any other equivalent federal, state or local governmental agency or commission in the United States or the Province of Ontario, Canada.

Employees do not need to notify the Company or seek the Company's prior authorization before making such disclosures or engaging in such communications.

## CERTIFICATION

I hereby certify that I have received, read and understand and I agree to abide by the **Fort Technology Inc. Corporate Communications Policy**.

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Name:

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Title:

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Date: