

Insider Dealing Policy

A) INTRODUCTION

The Cornish Lithium Ltd Insider Dealing Policy sets out the Company's zero-tolerance approach to insider dealing. References to Cornish Lithium Ltd in this Policy extend to each subsidiary of and entity within the Cornish Lithium Ltd group.

This Policy applies to and is to be adopted by all employees and consultants. Although this Policy is non-contractual and we may make changes to it from time to time, we expect everyone to comply at all times with the principles in this Policy and people will be held accountable for their behaviour in relation to this Policy. Action will be taken where this Policy is not followed and consequences are to be determined by the specific circumstances but may range from a warning to dismissal.

B) INSIDER DEALING

The Criminal Justice Act 1993 restricts transactions in publicly traded securities by persons possessing "inside" information - material nonpublic information relevant to the value of such securities. In light of these provisions, it is imperative that all persons who possess material nonpublic information about publicly traded securities: 1) refrain from purchasing or selling such securities; and 2) refrain from "tipping" (i.e. passing along) such information to others who may purchase or sell such securities. Insider dealing or "tipping" is a criminal offence and can also generate significant civil liability.

While Cornish Lithium Ltd itself has not issued publicly traded securities, it is important to understand that this restriction applies also to material nonpublic information relevant to any other publicly traded securities.

C) POLICY

In light of the potential severe penalties which could arise as a result of trading on, or tipping, nonpublic information, it is necessary that we establish formal policies governing securities trading by all employees and consultants.

Individuals covered by this Policy and their family members are prohibited from trading securities in the public companies in relation to which Cornish Lithium Ltd has materially relevant nonpublic information. A list of such companies is available from the Chairman.

Individuals covered by this Policy are prohibited from disclosing to any third party, including without limitation family members, any nonpublic information regarding the companies referred to in paragraph 1 above.

For the purposes of this Policy "family members" means members of the households or dependents of, and any trust or other entity controlled by, an individual.

Approved – 20 October 2021

