REVIEWED AND APPROVED BY THE BOARD OF DIRECTORS ON AUGUST 11, 2026

1.0 PURPOSE

The Disclosure Policy ("**Policy**") sets out the disclosure policies, practices and procedures to ensure that communications to the investment community, the media and general public by Aetherion Technologies Inc. (the "**Corporation**") are timely, accurate, and broadly disseminated in accordance with legal and regulatory requirements of Canadian and United States securities laws.

The goal of this policy is to raise awareness of the Corporation's approach to disclosure and to promote consistent disclosure practices among the Board of Directors (the "**Board**"), officers and employees. It is also intended to raise awareness of the risk of selective disclosures. Amongst other things, this increased awareness can reduce the likelihood of inadvertent insider trading.

The policies and procedures contained herein are intended to supplement and elaborate the policies and procedures set out in the Corporation's Insider Trading Policy and Code of Conduct. In cases where this Policy imposes more stringent standards, the standards in this Policy shall apply.

In this Policy, "**Aetherion**" means the Corporation and each of its direct and indirect subsidiaries ("**Subsidiaries**") which are not reporting issuers

2.0 SCOPE

This Policy applies to all employees and directors of Aetherion as well as its advisors, its subsidiaries and those authorized to speak on their behalf. This Policy covers disclosures in documents filed with the securities regulators and written statements made in Aetherion's annual and quarterly reports, news releases, letters to shareholders, presentations (both of a business or technical nature), marketing materials, advertisements, and information contained on Aetherion's website, Aetherion's social media and other electronic communications. It also extends to oral statements made in meetings and telephone conversations with analysts and investors, interviews with the media as well as speeches, press conferences, and conference calls.

3.0 NOTICE AND ENFORCEMENT

Every employee, officer and director will have access to a copy of this Policy and is responsible for becoming familiar with and understanding the provisions set out in the Policy. Compliance with this Policy is a condition of office or employment with the Corporation and its subsidiaries. All active employees, officers and directors are required as a condition of employment or their office, as the case may be, to review this Policy and acknowledge such review as part of the Corporation's annual Code of Conduct certification process.

Failure to comply with the Policy may carry severe consequences both for Aetherion and the individuals involved. A violation of this Policy may be grounds for disciplinary action, up to and including immediate termination of employment. Where violations constitute breaches of securities laws, individuals may be subject to personal civil, administrative, or criminal liability, including penalties, fines, and imprisonment. Aetherion may also face regulatory sanctions where applicable. Where Aetherion becomes aware of, or suspects, any conduct may have violated such securities laws, the Corporation may refer the matter to the appropriate regulatory authorities.

4.0 GUIDELINES

4.1 Definition of Material Change, Fact and Information

Material Change: A change in the business, operations or capital of the Corporation that would reasonably be expected to have a significant effect on the market price or value of any of Aetherion's securities.

Material Fact: A fact that significantly affects, or would reasonably be expected to have a significant effect on, the market price or value of Aetherion's securities.

Material Information: Information concerning Aetherion's business and affairs is considered material if it results in or would reasonably be expected to result in a significant change in the market price or value of the common shares of the Corporation. Stated another way, a reasonable investor would consider the information important in making a decision to buy or sell the Corporation's shares. Material information consists of both material facts and material changes relating to the Corporation's business and affairs, and can include positive or negative information about Aetherion. Refer to Appendix "A" for a non-exhaustive list of examples which are often considered to be material company events and information, as provided by the Canadian Securities Administrators and the Toronto Stock Exchange.

Aetherion's Finance, Investor Relations, and Legal Departments are responsible for determining the materiality of information and informing the Disclosure Committee (as described below). In the event of any ambiguity as to what constitutes "material information", the Committee should be consulted.

4.2 Responsibilities

The following describes the disclosure responsibilities within Aetherion:

4.2.1 DISCLOSURE COMMITTEE

Aetherion's Disclosure Committee ("**Committee**") is responsible for the implementation and administration of this Policy.

The membership of the Committee shall consist of the Corporation's Chief Executive Officer ("**CEO**"), Chief Financial Officer ("**CFO**"), Chief Legal Officer ("**CLO**") and the head of the investor relations function. The Committee may invite one or more of the following to advise the Committee as required: the Corporation's external legal counsel, the Corporate Secretary, the Vice President of Legal, the head of Risk Management, the head of accounting and corporate control function, a representative of the Corporation's business operations, or any other officer, employee or advisor that the Committee considers appropriate. In the event that there is no individual serving in a designated role, then the individual within the Corporation that is accountable to the Board and Senior Management for the same function shall fill the role.

The Committee will meet as conditions dictate, and quorum for any meeting of the Committee or approval of any Committee matter will consist of at least three members of the Committee including at least two of the CEO, CFO and CLO. The CFO will act as Chair of the Committee or, if unavailable, the Chair responsibilities will be delegated by the Committee. An individual designated by the Committee shall serve as secretary to the Committee and shall

maintain minutes of all meetings of the Committee. Voting on all matters shall be decided by majority vote. Potentially material news releases and written public disclosures must be circulated to all members of the Committee for review and approval.

The Board is responsible for reviewing and approving this Policy. Subject to the oversight of the Board, the Committee is responsible for:

a) Monitoring the effectiveness of and compliance with this Policy and reporting thereon quarterly to the Corporation's Board and/or any applicable committee of the Board;

b) Ensuring that adequate internal processes and disclosure controls are designed and operating effectively to provide assurance on the accuracy and completeness of information disclosed in documents to be filed with securities regulators or stock exchanges, or otherwise publicly disseminated or contained in public oral statements;

c) Assessing materiality and approving content and timing of dissemination of all written and planned oral public disclosures, or determining not to disclose (in the case of information that has been determined not to be material), when materiality issues are referred to the Committee;

d) Reviewing the Corporation's annual and quarterly disclosure documents before submission to the Board and/or Audit Committee, as applicable;

e) Informing the Board and the appropriate officers and employees about disclosure issues, this Policy, and maintaining the Disclosure Committee meeting minutes;

f) Reviewing and updating this Policy on a periodic basis to ensure compliance with changing regulatory requirements and making recommendations to the Corporation's Board and/or any applicable committee of the Board for any material changes proposed to this Policy;

g) Approving any changes to the designation of spokespersons and ensuring that spokespersons receive adequate training; and

h) Ensuring that when a material public disclosure requires correction, such correction is timely and made under the supervision of the Committee.

The Committee will set benchmarks for a preliminary assessment of materiality and timely disclosure and, using experience and judgment (taking into consideration such factors as the nature of the information, historical volatility of the Corporation's securities, and prevailing market conditions), will determine when developments justify public disclosure. It is essential that the Committee be kept fully apprised of all pending developments that inform materiality involving Aetherion in order to evaluate and discuss those events, and to determine the appropriateness and timing for public release of information. Potentially material news releases and written public disclosures must be circulated to all members of the Committee for review and approval.

If it is deemed that the information should temporarily remain confidential, the Committee will, in compliance with applicable regulatory requirements, determine the process upon which such confidential information will be

controlled and shall implement trading blackouts or restrictions in accordance with the Insider Trading Policy of the Corporation. The Corporation maintains a set of disclosure controls and supporting documentation to ensure the completeness and accuracy of information disseminated through press releases, conference calls and related communication channels.

4.2.2 CORPORATE SPOKESPERSONS

The Corporation has designated a limited number of spokespersons for communication with the media, analysts, investors, brokers and other members of the investment community. The Corporation's Chair of the Board, CEO, CFO, CLO, and the head of Investor Relations are designated as Aetherion's primary spokespersons. These spokespersons may, from time to time designate others within Aetherion or its operating units to respond to specific inquiries as necessary or appropriate.

It is essential that each spokesperson continue to be fully apprised of all corporate developments in order for them be in a position to comment on and discuss those events that may impact the disclosure process, such as the status of any corporate development activities, material operational developments, extraordinary and major transactions, major management changes, financial accounting issues, etc. The spokespersons shall be responsible for ensuring that they are fully informed about the Corporation and its disclosure policies, the regulatory requirements relating to continuous disclosure and the risks applicable to analyst or investor communications. The Committee or its members will ensure that spokespersons have been briefed and informed of all material events to be able to effectively carry out their responsibilities.

4.2.3 DISCLOSURE MONITORING

After public dissemination of an announcement by Aetherion, media and analyst coverage related to the announcement will be monitored by the Investor Relations Department to ensure accurate reporting. Corrective measures, if and when necessary, will be taken.

4.2.4 ACCIDENTAL DISCLOSURE

If a director, officer, or employee discloses material non-public information to an outside party and is concerned that such disclosure may not have been in accordance with this Policy, such person must immediately notify the Chair of the Committee.

4.2.5 EMPLOYEES

Employees who are not authorized spokespersons must not respond under any circumstances (including on a "no-names" or "off the record" basis) to inquiries from a stock exchange or other securities regulatory authority, the investment community, customers, suppliers, banks or the media, unless specifically asked to do so by an authorized spokesperson or unless required by law. As further described in Section 4.10.2 of this Policy, this prohibition also applies to all forms of social media, including but not limited to LinkedIn, X (Twitter), Facebook, and other online platforms. Employees must not engage with, “like”, repost, or otherwise interact with posts containing inquiries, rumours, or speculation involving Aetherion. Employees other than the authorized spokespersons or representatives must refer all general inquiries and calls from the financial community, shareholders, financial media, and calls from government, industry, or general media to the Investor Relations Department.

Directors, officers and employees of Aetherion should assume that all corporate information is confidential unless told otherwise. All Aetherion employees are also reminded that they have access to non-public information about Aetherion and its partners, which must be maintained as confidential.

4.3 Principles of Disclosure of Information

In complying with the requirement to immediately disclose all material information under applicable laws and stock exchange rules, the Corporation will adhere to the following basic disclosure principles:

a) Material information will be publicly disclosed immediately by way of a general news release.

b) Disclosure must include any information the omission of which would make the rest of the disclosure misleading.

c) Unfavourable material information must be disclosed as promptly and completely as favourable information.

d) No selective disclosure. Previously undisclosed material information must not be disclosed to selected individuals (for example, in an interview with an analyst or in a telephone conversation with an investor). If previously undisclosed material information has been inadvertently disclosed to an analyst or any other person not bound by an express confidentiality obligation, such information must be broadly disclosed immediately via news release.

e) Disclosure should be consistent among all audiences, including the investment community, the media, customers and employees. Derivative information (information extracted from a document filed on behalf of another person or company), which is included in a document or oral statement, should include a reference identifying the document that was the source of the information.

f) Disclosure on the Company's website alone does not constitute adequate disclosure of material information.

g) Inaccurate or incomplete disclosures must be corrected immediately if Aetherion subsequently learns that earlier disclosure by Aetherion contained a material error at the time it was given.

There are certain exceptions to these rules, including where disclosure of material information would be unduly detrimental to the Corporation. These situations shall be reviewed on a case-by-case basis by the Committee and may require approval from securities regulators.

4.4 Timing of Disclosure and Maintaining Confidentiality

Following the determination that an event that gives rise to material information (as defined by this Policy) will occur or has taken place, the appropriate timing for the release of this information must be determined.

Applicable stock exchange regulatory requirements require that material information about a corporation be disclosed as soon as practicable through broad dissemination of a news release (over one or more major wire

services) upon the information becoming known to management or upon it becoming apparent that the information is material. Aetherion's policy is to disclose material information in the timeliest manner possible.

Part 7 of Canadian National Instrument 51-102 "Continuous Disclosure Obligations" ("**NI 51-102**") requires that where material information constitutes a material change in the affairs of a corporation, the corporation must:

a) as soon as practicable issue and file a news release that is authorized by a senior officer disclosing the nature and substance of the change; and

b) file a required report (Form 51-102F3 - Material Change Report) as soon as practicable, and in any event no later than 10 days after the date on which the event giving rise to material information occurs.

Similar requirements exist under U.S. securities laws. It is Aetherion's policy to disclose material changes and file material change reports in the timeliest manner possible.

Public disclosure may be delayed if the Committee determines that such public disclosure would be "unduly detrimental" to the interests of Aetherion, in which case the information will be kept confidential temporarily to the extent permitted by law. For example, information regarding discussions or negotiations for an acquisition, merger or significant transaction may present a particularly sensitive timing issue as premature disclosure may affect Aetherion's negotiating position or ability to complete the transaction. In such a case, Aetherion's policy is to maintain confidentiality of such corporate information until the discussions are mature enough to warrant them being designated as material information (i.e. until all of the material terms of such transaction have been definitively agreed). Aetherion's policy is to limit the number of individuals within Aetherion who have access to or knowledge of the information, however, all members of the Committee will be informed.

In such a circumstance, the Committee will endeavour to prepare and file a material change report in Form 51-102F3 marked so as to indicate that it is confidential together with written reasons for non-disclosure. The Committee is required to advise the applicable securities regulatory authorities within 10 days of the date of filing such report, in writing, and every 10 days thereafter if it believes the report should continue to remain confidential. All such communications also must be communicated to the Audit Committee.

4.5 Stock Exchange Notification

4.5.1 TORONTO STOCK EXCHANGE

For material news that is released during stock exchange business hours (8:00 a.m. to 5:00 p.m. Eastern Standard Time), a copy of the news release must be provided to the Canadian Investment Regulatory Organization (CIRO) via CIRO Surveillance or other permitted means in advance of its release to enable a trading halt, if deemed necessary by the stock exchange. If a news release announcing material information is issued outside of business hours, CIRO Surveillance should nevertheless be notified by: online portal (News Release Vetting Request · Custom Portal) or phone (416.646.7220), , or through such other permitted means including another applicable market surveillance department.

If neither the Toronto Stock Exchange nor any other marketplace upon which securities of the Company are traded is open for trading at the time of a proposed announcement of material information, a copy of the press release shall be provided to the Surveillance Department of CIRO upon its issuance. If a proposed announcement does not contain material information, a copy of the press release shall be provided to the Surveillance Department of CIRO upon its issuance.

4.5.2 NASDAQ

For material news that is released during NASDAQ market hours (7:00 a.m. to 8:00 p.m. Eastern Standard Time), a copy of the news release must be provided to NASDAQ MarketWatch at least ten minutes prior to the release of the information. If the public release of the material information is made outside of NASDAQ market hours, companies should notify MarketWatch of the material information prior to 6:50 a.m. Eastern Standard Time. The material news notifications are submitted to MarketWatch via the Electronic Disclosure submission system at www.nasdaq.net or via email to nasdaqmarketwatch@nasdaq.com. A news release announcing non-material information may be distributed at any time and a copy of the release should be submitted to MarketWatch at the same time.

4.6 Rumours or Leaks

Aetherion does not comment affirmatively or negatively on rumours. Until such time as Aetherion has made appropriate public disclosure, as authorized by the Committee and Aetherion's Legal Department, no Aetherion personnel or representatives may comment on or substantively respond to inquiries or rumours concerning, but not limited to the areas below:

a) prospective developments or transactions involving Aetherion (including without limitation inquiries or rumours relating to the status of discussions, or Aetherion's plans, with respect to an acquisition of or by Aetherion);

b) developments regarding Aetherion's products (including without limitation product testing, marketing, and scheduled release dates); or

c) projections of, or guidance regarding, future financial performance by Aetherion (including without limitation reaffirmation of any previously provided projections or earnings guidance).

Except where otherwise specifically authorized by the Committee, all authorized spokespersons for Aetherion will respond to any inquiry or rumour regarding the matters set forth in this Section only with a statement to the effect that it is the policy of Aetherion: (i) not to comment on or respond to inquiries or rumours concerning prospective corporate developments or transactions; and (ii) to only refer to previous public statements or guidance about future financial performance. An example of an appropriate response statement is: "It is the policy of Aetherion not to comment on or respond to inquiries or rumours concerning prospective corporate developments or transactions, or future financial performance."

If the rumour is founded in whole or in part, the Corporation will consider whether immediately issuing a news release disclosing the relevant information would be appropriate. If a requirement to make a public statement in response to a rumour is received from a regulatory authority, the decision to make such a public disclosure, and the contents of such disclosure, should be made by the Committee and approved by the Board.

4.7 Forward-Looking Information

Forward-looking information may be provided from time to time to enable the investment community to better evaluate Aetherion's prospects. Aetherion may also make statements and respond to inquiries with respect to product development and projected demand or market potential for its products or services. Should Aetherion elect to disclose forward-looking information in continuous disclosure documents, speeches, conference calls, etc., any such forward-looking information will be publicly disclosed in accordance with this Policy:

- Materiality of forward-looking information will be determined by considering if a reasonable investor's investment decision would be influenced or changed if the forward-looking information were omitted or misstated.
- Forward-looking information will be broadly disseminated via news release.
- The forward-looking information will be published only if there is a reasonable basis for drawing the conclusions set out in such information.
- Forward-looking information will be clearly identified as forward-looking.
- All such statements will be accompanied by meaningful cautionary statements identifying important factors, risks and assumptions that were employed and a reminder that actual results could differ materially from those statements, as required by Part 4A and 4B of NI 51-102, as applicable.

In making public oral or written forward-looking statements, the spokespersons and/or document will contain cautionary language that actual results could differ materially and refer their audience to the 'Risks' section in the "Management's Discussion and Analysis" portion of the Corporation's latest annual report or the Annual Information Form (Form 20-F), as applicable, which describes the factors that could cause actual results to materially differ.

Financial guidance and other material forward-looking information to be publicly disclosed by Aetherion, as well as any subsequent confirmation or modification of such financial guidance and material forward-looking information shall be approved by the Committee, the Audit Committee and the Board of Aetherion.

Except to the extent imposed by law, Aetherion will not undertake, and will specifically disclaim, any obligation to update any forward-looking information provided by Aetherion. Aetherion will not respond, except by means of an appropriate public disclosure, to any inquiries seeking reaffirmation of such information at any date subsequent to the date as of which such information was provided. Statements such as "We are on track to achieve the previously disclosed forward-looking information" are not allowed under this Policy without appropriate public disclosure. An appropriate response would be to confirm the previously disclosed goal and to state that the corporation is pursuing it as per the following example: "Our revenue target for the year as disclosed during our last conference call is $XX million and the Corporation is focused on it."

4.8 Analyst Reports

4.8.1 DISTRIBUTING OR REFERRING TO ANALYST OR OTHER THIRD-PARTY REPORTS

Aetherion will not in the ordinary course distribute analyst reports to persons outside of Aetherion. Aetherion will, however, provide a list of analysts covering the Corporation that will include brokerage firm names and telephone numbers. This summary shall be updated promptly as changes to the information it contains occurs. Aetherion will also not post or link analysts' reports on its website.

4.8.2 ANALYST REPORTS AND MODELS

If requested, Aetherion may review analysts' draft research reports or models solely for the purpose of correcting factual errors of publicly disclosed information. Aetherion will not confirm, or attempt to influence, an analyst's opinions or conclusions and will not express comfort with an analyst's model and earnings estimates.

4.9 Employee Trading

Laws prohibit directors, officers, employees, and other individuals who have access to material non-public information affecting a public corporation, from trading the securities of that corporation or advising others of such information, before the information has been publicly disclosed. All readers of this Policy should refer to Aetherion's Code of Conduct and Insider Trading Policy for further details.

4.10 Dissemination of Other Information

4.10.1 NON-MATERIAL PRESS RELEASES

Where information is not material or does not constitute a "material change" but may nonetheless be of interest to Aetherion's shareholders or customers, the Corporation may issue a news release without filing a material change report and shall issue such a release where the information would be a "material fact" under the policies of the TSX. This is a routine procedure that consists of drafting a release, circulating it for review by the Corporation's Disclosure Committee and by other Aetherion officers as appropriate, including those providing a

quote, by alerting the relative exchanges, and disseminating the release through a regulatory-approved wire service.

4.10.2 ELECTRONIC COMMUNICATION

To prevent the inadvertent disclosure of material non-public information, employees of Aetherion are prohibited from posting information to or participating in internet chat rooms, blogs, news groups or social media forums such as X (Twitter), Facebook, YouTube, LinkedIn, Instagram and Snapchat on matters pertaining to Aetherion, its business and affairs or its listed securities unless authorized to do so by a spokesperson. Such participation without approval will be considered a violation of Aetherion's policies on confidentiality, and will be grounds for termination of employment.

All employee email addresses are considered, for purposes of this Policy, to be corporate addresses of Aetherion and all employee correspondence received and sent via email and through electronic means such as, but not limited to, PCs, laptops, tablets, phones, mobile devices, and text applications is considered, for purposes of this Policy, to be corporate correspondence of Aetherion.

4.10.3 WEBSITE

The head of the Investor Relations Department is responsible for monitoring the official Aetherion internet website, www.aetheriontech.com, to ensure that any information that is placed on the website is accurate and complete and, if material, has been previously broadly disseminated in accordance with this Policy. The head of the Investor Relations Department is also responsible for maintaining the "Investors" section of the Company's website (https://investors.aetheriontech.com/) and the Investor Relations Department shall be responsible for reviewing this section periodically throughout the year to ensure that the information in such section is up-to-date and accurate and is in compliance with the requirements of this policy.

The "Investors" section of Aetherion's internet website shall include all of the Company's "timely disclosure" documents issued and filed in accordance with applicable securities laws, any material that the Company has distributed to analysts and institutional investors and any other information deemed appropriate by the head of Investor Relations or shall include links to such materials. The "Investors" section shall include a notice that advises the reader that the information posted was believed to be accurate at the time of posting, but that (a) the Company will not, and specifically disclaims any duty to, update the information and (b) the information may be superseded by subsequent disclosures. Links from the Company's website to a third-party website must be approved by the head of Investor Relations. Any such links should include a notice that advises the reader that they are leaving the Company's website and that the Company is not responsible for the contents of the other site.

The head of Investor Relations shall maintain a log indicating the date that material information is posted or removed from the investor relations website. The minimum retention period for material corporate information on the website shall be two years after the date of its posting.

Aetherion will also post news releases on the official Aetherion internet website, www.aetheriontech.com, in addition to its policy of distributing news to those who have requested notification by email and have given Aetherion required consent. Aetherion's internet website is to be updated immediately upon dissemination of any

news releases. The news release page of the website shall include a notice that advises the reader that the information posted was accurate at the time of posting but may be superseded by subsequent news releases.

All supplementary non-material information (e.g. corporate presentations, analyst visit presentations) that is available to analysts and other parties but not otherwise publicly distributed will be posted on Aetherion's internet website as soon as practicable. If the volume of such information makes this impractical, Aetherion will describe the information on its internet website and provide contact information whereby an investor may contact Aetherion to obtain a copy of the information or review the information with Aetherion's spokespersons. Aetherion will also make available, to the extent possible and reasonable, on its internet website audio transcripts of conference calls, for a one month period, as soon as practicable after they occur.

The entire website should be reviewed regularly by the Investor Relations Department to ensure that the contents are current and accurate. Major revisions to the website shall be reviewed by the Disclosure Committee prior to their inclusion on the website. The Company's website shall contain contact information for the Investor Relations Department.

Documents filed with securities regulators can be found on:

- SEDAR+ (the System for Electronic Document Analysis Retrieval) in Canada at www.sedarplus.ca/home/; or
- EDGAR (Electronic Document Gathering Analysis and Retrieval System) in the United States at www.sec.gov

4.10.4 CORPORATE AND INDUSTRY INFORMATION

Aetherion will distribute, on a quarterly basis, the most recent financial statements (or where permitted by regulation, notice of the filing of such financial statements) to its mailing list, including investors, analysts and brokers, among others. In addition, Aetherion shall maintain an email address database of parties interested in receiving relevant public information on Aetherion. The Investor Relations Department shall distribute such selected information as it is available.

4.10.5 STATUTORY MAILINGS

As a public corporation, the Corporation is required to distribute certain documents, including its annual and quarterly reports, news releases, proxy statements, and annual information forms, to its registered shareholders and in some cases to its beneficial (indirect) shareholders.

4.11 Conference Calls for Quarterly and Annual Results and Major Developments

The Corporation may conduct quarterly and annual conference calls to discuss the results of each quarter and annual results. The calls will be announced via a news release no later than one week before the call. On the day of the call, and prior to the call's occurrence, the Corporation will issue a press release summarizing the key results and events of the quarter and/or fiscal year, if applicable. In addition, the news release will contain any material

forward-looking statements that will be discussed during the conference call. The press release will also provide a link to the relevant MD&A that is concurrently made available on the website.

All conference calls will be open to the public and will be available on a playback number for a 30-day period. The audio playback and a written transcript is expected to be available on Aetherion's Internet website for a period of at least 30 days after the conference call. The Corporation will only allow analysts to ask questions during the call but if the analyst list of questions is short, the attending members of the Corporation's senior management, at their discretion, may open up the call to any institutional investors.

With respect to periodic conference calls, the following steps will be taken:

a) advance public notice by news release of the date and time of the conference call, the subject matter of the call and the means of accessing it will be provided by Aetherion;

b) a news release will be issued through a widely-circulated news or wire service containing the relevant information to be discussed during the call;

c) the conference call will be held in an open manner, permitting investors to listen either by telephone or through internet webcasting; and

d) dial-in and/or web-based replay will be provided by Aetherion for a reasonable period of time after the conference call.

At the beginning of all conference calls, Aetherion will provide appropriate cautionary language respecting any forward-looking information, and will direct participants to publicly available documents containing the assumptions, sensitivities, risks, and uncertainties.

The Committee will determine in advance what information is to be disclosed in conference calls or other such meetings with analysts, shareholders, or other market professionals, and will brief those authorized spokespersons in attendance accordingly. No material information concerning the finances or prospects of Aetherion will be disclosed to analysts, shareholders, or other market professionals (in response to questioning or otherwise) before it has been released through the relative stock exchanges and disclosure process and, at a minimum, to national newswire services. If material information is to be announced at an analyst or shareholder meeting or a press conference, its announcement must be co-ordinated with a general public announcement by a news release.

4.12 Industry Conferences and Investor and Analyst Meetings

As part of Aetherion's ongoing investor relations activities, the Corporation may conduct meetings with its analysts and institutional shareholders, as well as attend industry conferences. At such conferences and meetings, to the extent material information is to be discussed, such material information that has been previously disclosed in accordance with this Policy may be discussed. Presentations can be given at industry conferences. For meetings between the Corporation and investors or analysts, the Corporation will make efforts to have two Aetherion representatives participate to reduce the risk of an inadvertent disclosure of non-disclosed material information.

4.13 Quiet Period Requirements

Each period beginning on the first day following the end of each fiscal quarter and each fiscal year, and ending when the earnings for that quarter or year have been publicly disclosed, will be a "Quiet Period". During a Quiet Period, spokespersons must not confirm or provide any forward-looking information relating to expected revenues, net income or profit, earnings per share, expenditure levels, and other information commonly referred to as earnings guidance or comments with respect to the financial results for the current fiscal quarter or fiscal year. The Corporation may discuss previously disclosed information relating to the business and affairs of the Corporation or any of its subsidiaries and generally disclosed forward-looking information during the Quiet Period when the forward-looking information does not constitute undisclosed material information. During a Quiet Period, spokespersons may respond to unsolicited inquiries if these are related to matters that are not considered material information or matters that are considered material information that have previously been generally disclosed.

4.14 Retention Period

The Committee will maintain a file of its continuous disclosure documents. News releases, documents filed with securities regulators, material communications with analysts and investors including transcripts or tape recordings of conference calls, speeches and presentations; notes from meetings and telephone conversations; debriefing notes; e-mails; and social media will be retained for a minimum of seven years, subject to any longer retention period required by applicable law, regulatory requirements, litigation hold or Aetherion policy.

5.0 REFERENCES

This Policy should be read in conjunction with the following Aetherion policies:

- Code of Conduct
- Insider Trading Policy

APPENDIX "A"

The following are examples from the Canadian Securities Administrators of the types of events or information which may be material. The list is not exhaustive, it is not intended to provide a comprehensive list of circumstances that could give rise to material information and is not a substitute for the Corporation exercising its own judgment in making materiality determinations.

Changes in Corporate Structure

- changes in share ownership that may affect control of the company
- major reorganizations, amalgamations, or mergers
- take-over bids, issuer bids, or insider bids

Changes in Capital Structure

- the public or private sale of additional securities
- planned repurchases or redemptions of securities
- planned splits of common shares or offerings of warrants or rights to buy shares
- any share consolidation, share exchange, or stock dividend
- changes in a company's dividend payments or policies
- the possible initiation of a proxy fight
- material modifications to rights of security holders

Changes in Financial Results

- a significant increase or decrease in near-term earnings prospects
- unexpected changes in the financial results for any periods
- shifts in financial circumstances, such as cash flow reductions, major asset write-offs or write-downs
- changes in the value or composition of the company's assets
- any material change in the company's accounting policy

Changes in Business and Operations

- any development that affects the company's resources, technology, products or markets
- a significant change in capital investment plans or corporate objectives
- major labour disputes or disputes with major contractors or suppliers
- significant new contracts, products, inventions, patents, or services or significant losses of contracts or business
- significant discoveries by resource companies
- changes to the board of directors or executive management, including the departure of the company's CEO, CFO, COO or president (or persons in equivalent positions)
- the commencement of, or developments in, material legal proceedings or regulatory matters
- waivers of corporate ethics and conduct rules for officers, directors, and other key employees
- any notice that reliance on a prior audit is no longer permissible
- de-listing of the company's securities or their movement from one quotation system or exchange to another

Acquisitions and Dispositions

- significant acquisitions or dispositions of assets, property or joint venture interests
- acquisitions of other companies, including a take-over bid for, or merger with, another company

Changes in Credit Arrangements

- the borrowing or lending of a significant amount of money
- any mortgaging or encumbering of the company's assets
- defaults under debt obligations, agreements to restructure debt, or planned enforcement procedures by a bank or any other creditors
- changes in rating agency decisions
- significant new credit arrangements