



Disclosure Policy

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1. Objective and Scope

The objective of this Disclosure Policy (the “**Policy**”) is to set out the policies and procedures that govern communications to the investing public concerning WELLSTAR Technologies Corp. (“**WELLSTAR**”). Subject to certain exceptions, the fundamental principle underlying this Policy is that the disclosure of material information respecting the business and affairs of WELLSTAR be:

- timely, factual, and accurate; and
- broadly disseminated in accordance with all applicable legal and regulatory requirements.

Decisions on whether developments are material (and therefore should be disclosed) are difficult and involve subjective judgment. As a result, it is difficult to make definitive rules regarding whether disclosure should be made in any particular case. This Policy: (i) confirms in writing WELLSTAR’s existing disclosure policies and practices; and (ii) provides guidelines concerning electronic communications.

This Policy extends to directors, officers, employees, contractors, consultants, temporary workers, volunteers, and other persons acting for or on behalf of WELLSTAR (collectively, “**Personnel**”), those authorized to speak on WELLSTAR’s behalf and all other insiders. It covers disclosure in documents filed with securities regulators, written statements made in WELLSTAR’s annual and quarterly reports, news releases, letters to shareholders, presentations by senior management and information contained on WELLSTAR’s website and in other electronic communications. It 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.

2. Disclosure Policy

The disclosure committee (the “**Disclosure Committee**”) will identify appropriate industry and corporate benchmarks for the preliminary assessment of materiality.¹ Guided by these benchmarks, the Disclosure Committee will have recourse to the experience and judgment of its members (and professional advisors, as appropriate) and will determine when developments should be publicly disclosed.

The Disclosure Committee consists of the following individuals:

Role	Responsibilities
WELLSTAR Chief Executive Officer (“CEO”)	• Authorized spokesperson responsible for communication with the investment community, regulators, and the media • Determines that a development is material and authorizes the issuance of news releases
WELLSTAR Chief Financial Officer (“CFO”)	• Chairs the committee • Authorized spokesperson responsible for communication with the investment community, regulators, and the media

¹ The Disclosure Committee is not a committee of the board of directors of WELLSTAR (the “**Board**”), but rather a committee consisting of senior personnel of WELLSTAR.

	• Reviews recordings of conference calls for previously undisclosed material information to then disclose broadly via news release as soon as practicable • Advises the CEO on materiality of disclosed information
WELL Health Technologies Corp. Chief Legal Officer (“CLO”)	• Advises the CEO on any exposure relating to disclosed information

The Disclosure Committee will meet quarterly and otherwise as conditions require. It is essential that the members of the Disclosure Committee be kept fully apprised of all pending material developments concerning WELLSTAR in order to evaluate and discuss those events and to determine the appropriateness and timing of public release of information. All Personnel should discuss any material development with a member of the Disclosure Committee. There are circumstances in which it is appropriate (to protect the interests of WELLSTAR and its shareholders) that information be kept confidential. If it is deemed that information should remain confidential, the Disclosure Committee will determine how that information will be controlled.

Prior to disclosure, the Disclosure Committee shall review the text of public oral statements and documents that contain material information or that will be filed with the securities regulatory authorities or with the government or an agency of the government under applicable securities or corporate law or with any stock exchange or quotation and trade reporting system under its bylaws, rules or regulations (“**Stock Exchange Requirements**”) in order to ensure that the statement or document, as the case may be, does not contain a “misrepresentation” (“**misrepresentation**” has the meaning given under applicable Canadian securities laws). Such review shall be in addition to, and not in lieu of, the review of such statements or documents by the Board, as applicable, and other Personnel otherwise responsible for the matters discussed in such statements or documents and/or the review of such statements or documents.

The Disclosure Committee will recommend changes to this Policy as needed to comply with changing regulatory requirements and will report on financial disclosures to the Audit and Risk Committee on an annual basis or more frequently as the Disclosure Committee or the Audit and Risk Committee may determine.

Decisions concerning the materiality and timing of disclosure shall be made by the CEO and CFO, after consultation with the legal member of the Disclosure Committee, where practicable. In urgent circumstances, the CEO or CFO may make a decision where consultation is not reasonably practicable, provided the other members are notified promptly.

2.1. Reporting to the Audit and Risk Committee

The Disclosure Committee will report to the Audit and Risk Committee of WELLSTAR (the “**Audit and Risk Committee**”) at least quarterly, in connection with the Audit and Risk Committee’s review of WELLSTAR’s annual or interim financial statements, MD&A and related earnings news releases. The report will summarize the Disclosure Committee’s review of those documents and of any other public disclosure containing financial information extracted or derived from the financial statements, including any material issues identified and the operation of the applicable review and approval procedures. The Disclosure Committee will also report at least annually on the adequacy and effectiveness of those procedures and recommend any changes considered appropriate.

The Disclosure Committee shall be responsible for ensuring that the Audit and Risk Committee is provided with the text of public oral statements and documents that contain disclosures requiring review by the Audit and Risk Committee. See section 15 – Specialized Financial Measures for the Audit and Risk Committee’s obligations to review financial disclosures.

3. Principles of Disclosure of Information

As a reporting issuer, WELLSTAR is required to disclose material information in a timely manner, subject to certain exceptions. Material information includes a material change and a material fact. A material change is (i) any change in the business, operations or capital of WELLSTAR that would reasonably be expected to result in a significant change in the market price or value of any of WELLSTAR’s listed securities, or (ii) a decision to implement such a change made by the Board or other persons acting in a similar capacity or by senior management of WELLSTAR who believe that confirmation of the decision by the Board or such other persons acting in a similar capacity is probable. A material fact is any fact that would reasonably be expected to have a significant effect on the market price or value of WELLSTAR’s securities. Information is also likely to be “material” if it would reasonably be expected to have a significant influence on a reasonable investor’s decision to buy, hold or sell WELLSTAR’s securities. Material information includes, but is not limited to, the following:

- changes in corporate structure
- changes in capital structure
- changes in financial results
- changes in business and operations
- significant acquisitions and dispositions
- changes in credit arrangements

It is the Disclosure Committee’s responsibility to determine what information is material in the context of WELLSTAR’s affairs. Materiality judgments are difficult and attempting to create an exhaustive list of events that are always or never material is neither appropriate nor feasible. WELLSTAR is in the best position to apply the definition of material information to its own unique circumstances, and decisions on disclosure will often require careful subjective judgments on behalf of the Disclosure Committee (with the assistance of WELLSTAR’s professional advisors, as appropriate). National Policy 51-201 – *Disclosure Standards* (“**NP 51-201**”) provides guidance on disclosure practices and acknowledges that disclosure of material undisclosed information is a difficult area involving competing business pressures and legislative requirements.² NP 51-201 also states that in making materiality judgments, it is necessary to take into account a number of factors that cannot be captured in a simple bright-line standard or test.

The Disclosure Committee must take into account a number of factors in making judgments concerning the materiality of information. Factors outlined in NP 51-201 include the nature of the information itself, the volatility of the issuer’s securities, and prevailing market conditions. In order to assist the Disclosure Committee in making necessary materiality judgments, WELLSTAR will monitor the market’s reaction to information that is publicly disclosed.

² See the British Columbia Securities Commission’s guidance at: [51-201 Disclosure Standards | BCSC](#)

WELLSTAR may also distribute analyst reports (if any) to the Board and senior officers to assist them in understanding how the marketplace values WELLSTAR and how corporate developments affect the analysis. The Disclosure Committee will utilize this information along with any other available information the Disclosure Committee deems appropriate when determining if specific information is material.

WELLSTAR will comply with the requirement to disclose material information under applicable laws and Stock Exchange Requirements. Subject to certain exceptions, material information will be publicly disclosed forthwith via news release.

While not exhaustive, the Disclosure Committee will consider the following points when making the determination whether to disclose information:

- In certain circumstances, the Disclosure Committee may determine that disclosure of certain information would be unduly detrimental to WELLSTAR and its shareholders. In this situation the information will be kept confidential until the Disclosure Committee determines it is appropriate to publicly disclose. Examples of instances in which disclosure might be unduly detrimental to WELLSTAR's interests include:
 - where release of the information would prejudice the ability of WELLSTAR to pursue specific objectives or to complete a transaction or series of transactions that are underway;
 - where disclosure of the information would provide competitors with confidential corporate information that would be of significant benefit to them; or
 - where disclosure of information concerning the status of ongoing negotiations would prejudice the successful completion of those negotiations.
- In circumstances where disclosure of a material change might have such an effect, the Disclosure Committee will cause a confidential material change report to be filed with the applicable securities regulators and will review its decision to keep the information confidential at least every 10 days for as long as the information remains undisclosed.
- Disclosure will include any information, the omission of which would make the rest of the disclosure misleading and will provide sufficient detail to permit investors to appreciate the substance and importance of the information.
- Disclosure will be factual and balanced, neither over-emphasizing favourable news nor under-emphasizing unfavourable news. Unfavourable news will be disclosed just as promptly and completely as favourable news.
- Selective disclosure is not acceptable. If previously undisclosed material information has been inadvertently disclosed to any person who is not bound by an express confidentiality obligation, such information will be broadly disclosed as soon as practicable via news release.
- Dissemination of information on WELLSTAR's website alone does not constitute adequate disclosure of material information.
- Disclosure will be corrected as soon as possible if WELLSTAR subsequently learns that earlier disclosure by WELLSTAR contained a material error at the time it was given or where the information subsequently becomes incorrect.

- Disclosure relating to corporate developments requires the exercise of judgment by the Disclosure Committee in determining the timing and propriety of such news releases. It is recognized that corporate development disclosure may be misleading where the disclosure is late or premature, and as such the timing of this disclosure requires careful consideration. Announcements of an intention to proceed with a transaction or activity should not be made unless WELLSTAR has the ability to carry out the intent (although proceeding may be subject to contingencies) and a decision has been made to proceed with the transaction or activity by the Board or by senior management with the expectation of concurrence from the Board.

4. Internal Reporting by Personnel

It is essential that the Disclosure Committee be kept fully apprised of all pending information and developments that are or may be material in order for the Disclosure Committee to evaluate those events and to determine whether disclosure is necessary or appropriate and, if so, the timing for public release of such information. Accordingly, any Personnel who becomes aware of material information about WELLSTAR must immediately disclose that information to the Disclosure Committee. If any Personnel is unsure at any time as to whether they are in possession of material information about WELLSTAR, they should contact the CLO or, if the CLO is unavailable, another member of the Disclosure Committee, for clarification.

If any Personnel becomes aware that (a) any information publicly disclosed by WELLSTAR contained or may have contained a misrepresentation, or (b) there has been or may have been a failure to make timely disclosure of material information, the Disclosure Committee should be promptly notified and the Disclosure Committee, after conducting a reasonable investigation of the information, shall endeavour to ensure that the material information, or correction thereof, as the case may be, is promptly disclosed in accordance with applicable laws and Stock Exchange Requirements.

5. Trading Restrictions and Restricted Periods

Trading in WELLSTAR securities while in possession of material undisclosed information, tipping, insider reporting obligations, trading restricted periods, and exceptions to trading restrictions are governed by the *WELLSTAR Insider Trading Policy*.

6. Maintaining Confidentiality

Any Personnel privy to material undisclosed information is prohibited from communicating such information to anyone else, unless it is necessary to do so in the course of business (see Section 7 of this Policy). In order to prevent the misuse or inadvertent disclosure of material undisclosed information, the procedures set forth below, which are not exhaustive, should be observed by Personnel at all times.

- Documents and files containing material undisclosed information should be kept in a safe place to which access is restricted to individuals who “need to know” the information and code names should be used if necessary.
- Material undisclosed information should not be discussed in places where the discussion will be overheard, such as elevators or restaurants.

- Material undisclosed information should not be discussed on wireless telephones or other wireless devices unless it is reasonable to believe that the discussion can be undertaken under secure conditions.
- Documents containing material undisclosed information should not be read or displayed in places where members of the public are present and should only be discarded in a responsible manner.
- Personnel must ensure they maintain the confidentiality of information in their possession outside of the office as well as inside the office.
- Transmission of documents by electronic means, such as by fax or directly from one computer to another, or any other electronic communication should be made only where it is reasonable to believe that the transmission can be made and received under secure conditions.
- Unnecessary copying of documents containing material undisclosed information should be avoided and documents containing material undisclosed information should be promptly removed from conference rooms and work areas after meetings have concluded. Extra copies of these documents should be discarded in a responsible manner.
- Access to material undisclosed electronic data should be restricted through the use of passwords and encrypted emails per WELLSTAR's IT policies.
- Visitors at WELLSTAR offices should be accompanied to ensure that they are not left alone in offices containing confidential information.
- Artificial intelligence shall only be used exclusively through WELLSTAR-approved channels.
- Confidential documents and storage devices should not be discarded where others can retrieve them.

Protecting confidentiality in a remote work environment is equally important. If working from home, Personnel must:

- be careful not to leave important files or confidential documents on a table or otherwise out in the open in a shared household;
- keep discussions private when confidential information is discussed, which means taking calls and conducting virtual meetings away from other people at home;
- ensure that laptop computers, tablets and smart phones that store confidential information or from which it can be accessed are password protected and are not left exposed or unattended in a shared household when they are unlocked, so that others, including family members, will not have access; and
- not allow others, including family members, to use laptop computers, tablets, and smart phones that are used for work, and which store confidential information or from which it can be accessed.

Employees, officers, and directors are reminded that communication by e-mail leaves a trail that may be subject to later decryption attempts. All undisclosed material information being

transmitted over the Internet should be secured by reasonable means, having regard to the nature of the information or the transaction being affected.

Outside persons privy to undisclosed material information concerning WELLSTAR will be told that they must not divulge such information to anyone else, other than in the necessary course of business and that they may not trade in WELLSTAR's securities until the information is publicly disclosed. Such outside persons will generally be required to confirm their commitment to non-disclosure in a written confidentiality agreement.

This Policy in no way affects Personnel's obligations with regards to confidential business information (including, for example, trade secrets and customer lists), the confidentiality of which must be maintained at all times and in addition are the property solely of WELLSTAR.

7. Disclosure in the Necessary Course of Business

If Personnel are in doubt as to whether communication is in the necessary course of business, they should discuss it with a member of the Disclosure Committee. Efforts will be made to limit access to material undisclosed information to those who need to know the information and such persons will be advised that the information is to be kept confidential.

NP 51-201 confirms that the question of whether a particular disclosure is being made in the necessary course of business is a mixed question of law and fact that must be determined in each case and in light of the policy reasons (that the general restriction not unduly interfere with WELLSTAR's ordinary business activities) underlying the prohibition on selective disclosure. This exception would generally cover circumstances where WELLSTAR communicates with:

- vendors, suppliers, or strategic partners on issues such as research and development, sales and marketing, and supply contracts;
- employees, officers, and Board members;
- lenders, legal counsel, auditors, underwriters, and financial and other professional advisors to WELLSTAR;
- parties to negotiations;
- industry associations;
- government agencies and non-governmental regulators; and
- credit rating agencies (provided that the information is disclosed for the purpose of assisting the agency to formulate a credit rating and the agency's ratings generally are or will be publicly available).

Selective disclosure of material undisclosed information to the media or to an analyst, institutional investor or other market professional will generally not be considered to be in the necessary course of business of WELLSTAR. Where WELLSTAR discloses material undisclosed information in the necessary course of business those receiving the information should understand that they cannot pass the information onto anyone else (other than in the necessary course of business), or trade on the information, until it has been generally disclosed. Employees, directors, officers, consultants, advisors, and other persons in a special relationship with WELLSTAR must also comply with the *WELLSTAR Insider Trading Policy*.

8. Authorized Spokespersons

WELLSTAR has designated the following “authorized spokespersons” responsible for communication with the investment community, regulators, and the media:

- CEO
- CFO
- WELLSTAR Head of Investor Relations or person in this capacity

The individuals listed may, from time to time, designate others within WELLSTAR to speak on behalf of WELLSTAR as back-ups or to respond to specific inquiries.

Personnel who are not authorized spokespersons must not respond under any circumstances to inquiries from the investment community, the media, or others, unless specifically asked to do so by an authorized spokesperson. All such inquiries shall be referred to one of the authorized spokespersons.

9. Responsibility for Electronic Communication

This Policy applies to electronic communications. Accordingly, officers and Personnel responsible for written and oral public disclosures are also responsible for electronic communications.

WELLSTAR will continuously update the Investor Relations section of WELLSTAR’s website and will monitor all information placed on the website for accuracy, completeness, currency and compliance with relevant securities laws. WELLSTAR will also ensure that any material information posted on the website has been previously broadly disseminated in accordance with this Policy.

Investor relations material will be contained within a separate section of WELLSTAR’s website and will include a notice that states:

“The information herein is provided for historical purposes only and that while information contained within press releases or conference calls was believed to be accurate at the time of issue, WELLSTAR will not, and specifically disclaims any duty to, update this information.”

Such investor relations material shall include, or shall include links to, all of the WELLSTAR’s “timely disclosure” documents issued and filed in accordance with applicable securities laws, any material that WELLSTAR has distributed to analysts and institutional investors and any other information deemed appropriate by the Head of Investor Relations or person in this capacity. WELLSTAR’s website shall contain contact information for the Head of Investor Relations or person in this capacity.

All data posted to the website, including text and audiovisual material, will identify the date such material was issued. Any material changes in information will be updated as soon as possible. WELLSTAR will maintain a log indicating the date that material information is posted and/or removed from the Investor Relations section of WELLSTAR’s website. The minimum retention period for material corporate information on the website will be two years after the date of its posting.

Disclosure on WELLSTAR’s website alone does not constitute adequate disclosure of information that is considered material non-public information. Any disclosures of material information on the website will be preceded by the issuance of a news release.

Responses to electronic inquiries will be provided as appropriate. Only public information or information that could otherwise be disclosed in accordance with this Policy will be utilized in responding to electronic inquiries.

In order to avoid inadvertent disclosure of material undisclosed information, Personnel are prohibited from participating in Internet blogs, chat rooms, newsgroup discussions, or social media forums (such as X/Twitter, Facebook, YouTube, LinkedIn, Instagram and Snapchat) on matters pertaining to WELLSTAR's activities or its securities. Personnel who encounter a discussion pertaining to WELLSTAR should advise a member of the Disclosure Committee immediately, so the discussion may be monitored.

Personnel corporate e-mail addresses are, in fact, company addresses. Therefore, all correspondence received and sent via e-mail is to be considered corporate correspondence.

9.1. News Releases

Once a majority of the members of the Disclosure Committee or the CEO determines that a development is material, such members, or the CEO (as applicable) will authorize the issuance of a news release, unless the Disclosure Committee determines that such development should remain confidential for a period of time, in which case appropriate confidential filings will be made and controls of that inside information will be instituted. The foregoing sentence will not apply in respect of news releases approved by the Board or the Audit and Risk Committee. Should material undisclosed information be inadvertently disclosed on a selective basis, WELLSTAR will issue a news release as soon as practicable in order to disclose that information.

The Disclosure Committee shall also determine whether the material information constitutes a "material change", pursuant to applicable securities legislation, and if so, WELLSTAR shall file a "material change report" with relevant Canadian securities commissions as soon as practicable, and in any event within 10 days of the material change.

WELLSTAR will pre-file all proposed press releases containing material information with the Market Surveillance Department of the Canadian Investment Regulatory Organization ("**Market Surveillance**") (through its PR portal or email). WELLSTAR will seek approval from Market Surveillance prior to disseminating the news release if the proposed press release is expected to be disseminated while markets are open, or if the TSX Venture Exchange, or any other stock exchange on which WELLSTAR is traded, is open for trading at the time the proposed press release is filed with Market Surveillance.

Annual and interim financial results will be publicly released as soon as practicable following Board approval of the applicable news release and related financial statements.

News releases will be disseminated through an approved news wire service that provides simultaneous national distribution. News releases will also be posted on WELLSTAR's website in the Investor Relations section and on SEDAR+ after release over the news wire.

9.2. Conference Calls and Press Conferences

Conference calls or press conferences (each referred to herein as a "**conference call**" or "**call**") may be held to enable management to discuss quarterly earnings and major corporate developments. Such conference calls are to be accessible simultaneously to all interested parties, some as participants by telephone and others in a listen-only mode by telephone or

via a webcast over the Internet. Each such call will be preceded by a news release setting out relevant material information. At the beginning of the call, a spokesperson of WELLSTAR will provide appropriate cautionary language with respect to any forward-looking information and direct participants to publicly available documents containing the assumptions, sensitivities and a full discussion of the risks and uncertainties.

Where practicable, conference calls shall be scripted, and the Disclosure Committee will review and provide comments on the script prior to the call.

WELLSTAR will provide advance notice of any conference call and webcast by issuing a news release announcing the date and time and providing information on how interested parties may access the call and webcast. In addition, WELLSTAR may invite analysts, institutional investors, the media, and other interested parties to participate. Such notice will also be posted on WELLSTAR's website.

If the Disclosure Committee determines that there was selective disclosure of previously undisclosed material information on the conference call, WELLSTAR will promptly disclose such information broadly via news release as soon as practicable.

Any supplemental information provided to participants shall also be posted to WELLSTAR's website for others to view. An archived audio webcast, or an audio transcript of the conference call, shall be made available in the Investor Relations section of WELLSTAR's website following the call for a minimum of 30 days for anyone interested in listening to a replay and the audio recording shall be retained for a minimum of six years in WELLSTAR's records.

10. Rumours

WELLSTAR does not comment, affirmatively or negatively, on rumours. This also applies to rumours on the Internet. WELLSTAR's authorized spokespersons will respond consistently to those rumours with the following comment:

"It is our policy not to comment on market rumours or speculation."

Should any stock exchange on which the securities of WELLSTAR are listed request that WELLSTAR make a definitive statement in response to a market rumour that is causing significant volatility in the shares of WELLSTAR, the Disclosure Committee will consider the matter and decide whether to make a policy exception.

11. Contacts with Analysts, Investors and Media

Meetings with analysts and significant investors are an important element of WELLSTAR's investor relations program. WELLSTAR will meet with analysts and investors on an individual or small group basis as needed and will initiate contacts or respond to analyst and investor calls in accordance with this Policy.

Disclosure in individual or group meetings does not constitute adequate disclosure of information that is considered to be material non-public information. If WELLSTAR intends to announce material information at an analyst or shareholder meeting or a press conference or conference call, the announcement must be preceded by a news release.

WELLSTAR will provide only non-material information through individual and group meetings, in addition to regular publicly disclosed information. WELLSTAR cannot alter the materiality of information by breaking down the information into smaller, non-material components.

If there has been selective disclosure to analysts, investors or the media of previously undisclosed material information, WELLSTAR shall immediately disclose such information broadly via a news release, in accordance with this Policy. If it is uncovered that a material misstatement was made in such a meeting, the Disclosure Committee shall consider and, if deemed advisable, authorize release of an appropriate statement or other disclosure correcting such misstatement.

12. Reviewing Analyst Draft Reports and Models

WELLSTAR may review draft analyst reports or models solely to identify factual inaccuracies by reference to publicly disclosed information. WELLSTAR shall not confirm or comment on an analyst's forecasts, estimates, assumptions, conclusions or recommendations and shall not express comfort with the analyst's report or model, subject always to the concerns expressed in Section 5.2 of NP 51-201.

13. Distributing Analyst Reports

Analyst reports are proprietary products of the analyst's firm. For these reasons, WELLSTAR will not post such reports on its website, without prior consent from the analyst's firm. WELLSTAR may post on its website a complete list, in alphabetical order, of all the investment firms and analysts who provide research coverage on WELLSTAR, regardless of the recommendation. If so provided, such list shall not include links to the analysts' or any other third-party website or publication.

WELLSTAR may distribute analyst reports internally to directors and senior officers or to WELLSTAR's financial and professional advisors.

14. Forward-Looking Information

As a general policy, WELLSTAR does not disseminate future oriented financial information ("FOFI") (as contemplated by National Instrument 51-102 – *Continuous Disclosure Obligations*). However, the Board may authorize the dissemination of FOFI and may establish guidelines relating thereto, on a general or specific basis.

The dissemination of any material financial outlook (e.g., earnings guidance) or FOFI (e.g., forecasted financial statements) must also be authorized by the Audit and Risk Committee.

Should other forward-looking information ("FLI") be disclosed in continuous disclosure documents, speeches, conference calls, etc., the following guidelines will be observed.

- WELLSTAR will not disclose FLI unless it has a reasonable basis for doing so.
- The information, if deemed material, will be broadly disseminated via news release, in accordance with this Policy.
- The information will be clearly identified as forward-looking.
- WELLSTAR will identify all material assumptions used in the preparation of the FLI.
- The information will be accompanied by a statement that identifies, in specific terms, the risks and uncertainties that may cause the actual results to differ materially from

those projected in the statement, which may include a sensitivity analysis to indicate the extent to which different business conditions from the underlying assumptions may affect the actual outcome.

- Any cautionary statement concerning updates to FLI shall be subject to WELLSTAR's obligations under applicable securities laws.
- WELLSTAR shall review previously disclosed material FLI as part of each interim and annual reporting process and provide any updates, comparisons to actual results or disclosure of withdrawals required by applicable securities laws.
- The information will be accompanied by a statement that disclaims WELLSTAR's intention or obligation to update or revise the FLI, whether as a result of new information, future events or otherwise. Notwithstanding this disclaimer, should subsequent events prove past statements about current trends to be materially off target, WELLSTAR may choose to issue a news release explaining the reasons for the difference. In this case, WELLSTAR will update its guidance on the anticipated impact on revenue and earnings (or other key metrics).

If anticipated results differ materially from previously disclosed guidance or otherwise constitute material information requiring disclosure, WELLSTAR shall consider whether a news release or other public disclosure is required.

15. Specified Financial Measures

WELLSTAR shall comply with National Instrument 52-112 – *Non-GAAP and Other Financial Measures Disclosure* (“**NI 52-112**”) when publicly disclosing a non-GAAP financial measure, non-GAAP ratio, total of segment measures, capital management measure or supplementary financial measure. Such disclosure shall include the designations, explanations, reconciliations, comparative information and other disclosure required by NI 52-112 and shall not give a specified financial measure greater prominence than the most directly comparable financial measure presented in WELLSTAR's financial statements.

Management shall be responsible for preparing specified financial measures, and the Disclosure Committee shall review them before public disclosure. The Audit and Risk Committee shall review specified financial measures included in WELLSTAR's MD&A, material financial guidance or FOFI, and financial disclosure contained in securities offering documents. The Audit and Risk Committee shall also be satisfied that adequate procedures are in place for reviewing other public disclosure of financial information extracted or derived from WELLSTAR's financial statements and shall periodically assess the adequacy of those procedures.

16. Expertized Disclosure

Prior to any public statement or disclosure or a filing with a securities regulatory authority by WELLSTAR or by a person on behalf of WELLSTAR that includes, summarizes or quotes from a report, statement or opinion made by an “expert” (as that term is understood pursuant to applicable securities laws) and unless the Disclosure Committee determines otherwise, WELLSTAR shall obtain the written consent of such expert to such statement, disclosure or filing (which has not been withdrawn in writing by the expert prior to the Company's disclosure or filing) and the Disclosure Committee shall make reasonable efforts to determine that WELLSTAR or the relevant person does not know and has no reasonable grounds to

believe that there is a misrepresentation in the applicable statement, disclosure or filing made on the authority of the expert and to determine that the statement, disclosure or filing fairly represents the report, statement or opinion made by the expert.

17. Quiet Periods

In order to avoid the potential for selective disclosure or even the perception or appearance of selective disclosure, WELLSTAR will observe quiet periods prior to quarterly earnings announcements or when material changes are pending. During a quiet period, WELLSTAR will not initiate or participate in any meetings or telephone contacts with analysts and investors (and no earnings guidance will be provided to anyone), other than responding to unsolicited inquiries concerning factual matters. The quiet period commences seven days prior to the issuance of a news release disclosing quarterly or annual results. Any press release to be issued by WELLSTAR during a quiet period should be reviewed and authorized by the Disclosure Committee, unless such release has been separately reviewed and authorized by the Board.

Additional quiet periods may be established from time to time by WELLSTAR as a result of special circumstances relating to WELLSTAR. The existence of a special purpose quiet period will be communicated by a means approved by the Disclosure Committee (which may include email).

If WELLSTAR is invited to participate, during a quiet period, in investment meetings or conferences organized by others, the Disclosure Committee will determine, on a case-by-case basis, if it is advisable to accept these invitations. If accepted, caution will be exercised to avoid selective disclosure of any material undisclosed information.

Quiet periods under this Policy are separate from trading restricted periods under the *WELLSTAR Insider Trading Policy*.

18. Communication and Enforcement

This Policy extends to all Personnel of WELLSTAR, the directors and officers of WELLSTAR, consultants and advisors retained by WELLSTAR and all other persons authorized to act as spokespersons of WELLSTAR. New Personnel will be provided with a copy of this Policy and will be advised of its importance. This Policy will also be posted on WELLSTAR's internal web portal, where it will be accessible to all Personnel. The foregoing individuals may be requested to certify their compliance with this Policy on a periodic basis and whenever changes are made to its contents. This Policy must be reviewed annually and whenever material legal, regulatory, or market changes occur. It will be republished only when amendments are made.

Personnel who violate this Policy may face disciplinary action up to and including termination of employment for cause, with WELLSTAR, without notice. Violation of this Policy may also violate certain securities laws. If it appears that Personnel may have violated such securities laws, WELLSTAR may refer the matter to the appropriate regulatory authorities, which could lead to penalties, fines or imprisonment.

19. Related Documentation

19.1. Related Policies

WELLSTAR Insider Trading Policy

19.2. External References

National Policy 51-201 – *Disclosure Standards*

National Instrument 51-102 – Continuous Disclosure Obligations

National Instrument 52-112 – Non-GAAP and Other Financial Measures Disclosure