

WHISTLEBLOWER POLICY

Introduction

Fireweed Metals Corp. (“**Fireweed**”) is committed to conducting our business in accordance with Fireweed’s Code of Ethics and policies to maintain and promote a culture of openness and accountability. We recognize the importance of an individual (“**Whistleblower**”) being able to confidentially report information about activity that is considered unethical, unlawful, or fraudulent, and may be detrimental to Fireweed or others conducting business for or on behalf of Fireweed (“**Personnel**”). This Whistleblower Policy (“**Policy**”) outlines the requirements and process to facilitate the reporting, review, and resolution of wrongdoing (“**Reportable Matter**”).

This Policy is to be read and adhered to in conjunction with Fireweed’s Disclosure and Insider Trading Policy.

Definitions

Whistleblower: A person (including employees, suppliers, contractors, and clients) who, acting honestly and in good faith, reports knowledge of a potential Reportable Matter.

Reportable Matters: Include actual or suspected activities that are unethical, unlawful, or fraudulent, relating to accounting, audit, corporate governance, internal controls or financial reporting matters, or misaligned with Fireweed’s Code of Ethics or policies.

Objectives

- Facilitate the confidential receipt, retention, review, and resolution of Whistleblower reports.
- Encourage and enable Whistleblowers to confidentially report Reportable Matters through Fireweed’s Whistleblower website.
- Provide guidance on Reportable Matters, such as:
 - Fraud or deliberate misleading statement in the preparation, evaluation, review, or audit of any financial disclosure or records of Fireweed.
 - Misrepresentation or a false statement by or to any Personnel regarding a matter contained in the corporate records or reports.
 - Deviation from full and fair reporting of Fireweed’s financial condition or compliance status.
 - Non-compliance with Fireweed’s Code of Ethics and policies.

Responsibilities

Any person who has a concern or has raised a concern with their manager or immediate supervisor and is not satisfied that it has been adequately addressed may report through the Fireweed Whistleblower

reporting website. All concerns must be reported honestly and in good faith, with reasonable grounds for believing a Reportable Matter exists, or will occur.

Management is responsible for (i) ensuring that employees under their supervision are familiar with the Fireweed Whistleblower website for reporting any Reportable Matters, and (ii) providing regular updates to the Audit Committee of the Board (“**Audit Committee**”). The Audit Committee will (i) periodically review this Policy, (ii) monitor compliance with this Policy, and (iii) evaluate Fireweed’s progress in achieving the Policy’s objectives. The Board is responsible for oversight of this Policy.

It is the responsibility of all involved parties to manage a Reportable Matter confidentially to avoid retaliation against a Whistleblower.

Confidential Reporting

When reporting a Reportable Matter, the Whistleblower must describe the matter in sufficient detail to allow Fireweed to understand and review the issue, including but not limited to: the background and history of the incident (giving relevant dates); the reasons prompting the particular concern about the activity; and the extent to which the Whistleblower has personally witnessed or experienced the Reportable Matter (providing documented evidence where possible).

When reporting, the Whistleblower has the option to remain anonymous. However, Fireweed’s ability to assess, investigate, and address Reportable Matters may, in some instances, be restricted or compromised without Whistleblower identity.

All reports will be appropriately investigated without fear of retaliation or adverse consequences to all involved (i.e., Whistleblower, investigator(s), and/or those providing assistance in review of the report). Any employee who retaliates against someone who has raised a question or issue in good faith is subject to discipline up to and including termination of employment. All other stakeholders who act in good faith shall also suffer no consequences for bringing about legitimate matters to the Audit Committee for consideration. and investigator(s)). In the event of reporting on a Reportable Matter for frivolous or malicious purposes or for personal gain, appropriate disciplinary or legal action will be taken against the Whistleblower, including possible dismissal for cause.

Whistleblower Reporting: <https://whistleblowersoftware.com/secure/fireweedmetalswhistleblowing>

Issues and Concerns: <https://whistleblowersoftware.com/secure/fireweedmetalsfieldconcerns>

When a Reportable Matter is reported, Fireweed will protect the confidentiality of the Whistleblower and those involved in the investigation, subject to law, rule or regulation, or any applicable legal proceedings. There may be times when the Whistleblower must be identified to enable Fireweed to thoroughly investigate the Reportable Matter.

Report Investigation

The Chair of the Audit Committee will review each report promptly, thoroughly, and impartially, and shall determine the steps and procedures to be taken. It is expected that the Chair of the Audit Committee will review each report with the Chair of the Corporate Governance and Nominations Committee. In the event an investigation is required, the Chair of the Audit Committee will determine what form an investigation should take, as well as other relevant factors (e.g., whether external investigators should be employed;

the urgency of an investigation and other aspects as deemed appropriate to the circumstances). The duration of an investigation will depend on the nature and severity of the Reportable Matter.

The Whistleblower, if identified, will be informed of the outcome of any review, investigation, or subsequent actions.

Fireweed shall retain records of any reports, including documentation outlining any investigations or actions taken, for a period of no less than seven (7) years.

*Approved by the Board of Directors on **August 22, 2023**.*