

Insider Trading Policy

1. Introduction

Lithium Inc. USA (the "Company") is committed to maintaining the highest standards of ethical conduct and integrity in all aspects of its business operations. This Insider Trading Policy is designed to prevent insider trading and ensure compliance with securities laws and regulations.

2. Purpose

The purpose of this policy is to:

- 2.1. Prevent insider trading by Company personnel and other insiders who have access to material, non-public information.
- 2.2. Promote compliance with applicable laws and regulations, including the Securities Exchange Act of 1934 and related regulations.
- 2.3. Protect the reputation of the Company and its employees by adhering to strict ethical standards.

3. Scope

This policy applies to all directors, officers, employees, and consultants of the Company, as well as any other individuals who may be deemed insiders under securities laws and regulations.

4. Prohibited Activities

- 4.1. **Trading on Material Non-Public Information:** No insider shall engage in the purchase or sale of the Company's securities while in possession of material, non-public information about the Company. This prohibition also extends to tipping others who may engage in such trading.
- 4.2. **Pre-Clearance of Trades:** Insiders who wish to trade in the Company's securities must pre-clear their transactions with the Company's Compliance Officer or designated compliance personnel.

4.3. **Blackout Periods:** The Company may establish blackout periods during which insiders are prohibited from trading in the Company's securities. These blackout periods typically occur around the time of financial reporting.

5. Reporting Obligations

5.1. **Reporting of Transactions:** All insiders must promptly report their securities transactions, whether pre-cleared or not, to the Company's Compliance Officer or designated compliance personnel.

6. Consequences of Violations

6.1. **Legal Consequences:** Violation of insider trading laws and regulations can result in severe civil and criminal penalties, including fines and imprisonment.

6.2. **Company Consequences:** Violation of this policy may result in disciplinary action by the Company, up to and including termination of employment.

7. Conclusion

This Insider Trading Policy serves as a reminder of the importance of ethical behavior and compliance with securities laws. All individuals subject to this policy are expected to adhere to its principles and report any suspected violations promptly.

Effective Date: *October 30, 2023*

This Insider Trading Policy reflects the commitment of Lithium Inc. USA to maintaining ethical conduct and compliance with securities laws. It helps protect the Company, its employees, and its stakeholders from the legal and reputational risks associated with insider trading.

LITHIUM® Inc is registered in Delaware, United States

Office Address: 10411 Motor City Drive, Suite 750 #1025, Bethesda, MD 20817, United States.

Phone: (667) 244-8449 Fax: (667) 218-3805 Email: info@lithium.com Website: www.lithium.com