

## Atlas Consolidated Mining and Development Corporation

# INFORMATION DISCLOSURE POLICY

#### 1. Purpose

The purpose of the Policy is to ensure regulation of the disclosure pertaining to information about the Corporation by the Directors, Officers and Employees of the Corporation. The Corporation adheres to the principle of ensuring full, fair, timely and accurate disclosure of material information pertaining to the Corporation.

#### 2. Authorized Persons

The following are the Persons or Officers of the Corporation authorized to disclose information to interested third parties such as investors, the public, the mass media, regulatory bodies and other governmental authorities: The President, Chief Executive Officer (CEO), Chief Financial Officer (CFO), Compliance Officer (CO), Corporate Secretary (Corporate Secretary) or the Chief Information Officer (CIO).

#### 3. Information

The Company's Confidential Information, Material Information and Non-Public Information include but are not limited to the following:

- a. Trade secrets or any non-public information about the Corporation with actual or potential commercial value;
- b. Financial Models;
- c. Business Strategies and Plans;
- d. Financial Projections;
- e. Prospective Investments;
- f. Information about the Company and its securities which have not been disclosed to the public wherein such information may reasonably be expected to materially affect market activity and the price of its securities;
- g. Information, access to which is not restricted in any way, and the disclosure of which is required under the Corporation Code, the Securities Regulation Code (SRC), its Implementing Rules and Regulations (IRR) and other applicable and relevant laws and regulations and;
- h. Other non-public information that are not required to be disclosed by the relevant regulatory bodies under the law, disclosure and reportorial rules and regulations.

## 4. Disclosure Rules

- a. The Policy shall be enforced in accordance with applicable laws, and in the best interests of the Company and its Shareholders with the objective of providing information to Government Agencies and Regulatory Agencies, Shareholders and Interested Parties in order to assist such bodies and persons with their respective concerns and in making sound investment decisions.
- b. In disclosing information about the Corporation, the Authorized Persons shall adhere to the principles of accuracy, timeliness and completeness and be guided by relevant provisions of the laws, rules and regulations, the Articles of Incorporation and By-Laws, the Policies and Codes of the Company, without prejudice to the protection of the Company's interests.



- c. The Corporation shall not refrain from the disclosures of negative information if such is considered material or essential to stakeholders or potential investors.
- d. No preferential treatment of any one group of recipients of such information or selective disclosure shall be tolerated by the Company unless otherwise provided for by the law and other applicable rules and regulations.

### 5. Miscellaneous

This Policy has been adopted by the Board Directors (BOD) of AT and any material amendment to the terms of this Policy must be approved by the BOD. This Policy shall take effect upon approval by the latter and shall apply prospectively. The same shall be reviewed by the BOD annually.