

Sona Nanotech Inc. (“Sona” or the “Company”)

SOCIAL MEDIA POLICY
(draft, pending Board approval)

Social Media

It is permissible for Sona employees and/or consultants (“Employees”) to use social media such as LinkedIn, Facebook, Twitter etc. or acceptable blogging sites so long as such use with respect to Sona is reported to and approved beforehand by the Chief Executive Officer (“CEO”) of Sona and otherwise complies with the provisions of this policy and securities regulations and requirements. Social Media does not include investor chat rooms or newsgroup discussions. Employees are prohibited from participating in such forums and shall not post or comment or use aliases to participate in these venues.

Standards of Conduct in the Use of Social Media

Social media is a useful tool in becoming a part of the industry conversation and promoting web-based sharing of ideas and exchanging information. When used in a professional context, Social Media is to be used to convey information about firm activities, promote and raise awareness of Sona’s brand, communicate with Employees and customers to brainstorm, issue or respond to breaking news or negative publicity, and discuss corporate, business-unit and department-specific activities and events. As an Employee, any social media comments can reflect on Sona.

To ensure that the use of Social Media complies with Sona’s regulatory duties relating to any social media activity, **personal or business**, Employees must always adhere to the following principles:

- Statements made may only reflect honest beliefs, opinions, or experiences.
- No claims may be made that are deceptive or misleading about Sona’s activities, or its competitors’ activities, to investors and potential investors (the public).
- Any claims made must be supported by adequate proof.
- No communication may be defamatory or infringe upon the intellectual property, or privacy and publicity rights of others. Employees may not post content (photos/videos) without written permission from the person who owns the photo or video as well as any persons depicted in the photo or video.
- Employees may not offer for sale, or solicit, products or services on behalf of Sona without express written direction from Sona.
- Employees may not make offensive comments that have the purpose or effect of creating an intimidating or hostile environment, including telling lies or spreading rumors about Sona, its Employees, officers, directors, shareholders or competitors.
- The use of ethnic slurs, personal insults, obscenity, or other offensive language is strictly prohibited.
- Employees may not make any comments or post any content that in any way promote unsafe activities that could lead to an unsafe situation.
- When using social media, Employees must adhere to the posting guidelines and Terms of Use on any site on which they post content.
- Sona trademarks, logos or other proprietary materials may only be used with explicit written permission from Sona.

Disclosure Requirements

In addition to the above general requirements, the following disclosure requirements must also be followed by all Sona Representatives and Employees using social media:

- All material connections to Sona must be disclosed in all advertising messages and promotional communications concerning Sona and its products or services, when it is not already apparent to the reader that a material connection exists between Sona and the Employee (i.e. the fact that the communication is written by an Employee of Sona must be disclosed)
- A “material connection” is one that could influence the weight or credibility a reasonable investor or prospective investor would give to the communications or messages made by the Employee.
- All disclosures must be made clearly and conspicuously, with appropriate consideration for the limitations and nature of the platform being used.
- No social media discussion concerning any investor or potential investor of Sona is permitted unless the content is pre-approved by the CEO.
- Sharing images/photos of drill cores or site on company social media is prohibited unless pre-approved by the CEO.
- Employees who post their own opinions, comments or content about Sona and its products or services, must disclose that their views do not necessarily represent those of Sona.
- Sharing images/photos of drill cores or site on personal social media is explicitly prohibited
- Any messages or posts containing anything of a technical nature must be approved by both the CEO and Sona’s QP.