NEW FOUND GOLD CORP.

WHISTLEBLOWER POLICY

1. INTRODUCTION

New Found Gold Corp. (the "**Company**") is committed to complying with all applicable requirements including those concerning corporate accounting practices, accounting controls and auditing practices ("**Accounting Standards**") and with its Code of Business Conduct and Ethics (the "**Code**"), which requires the observation of high standards of business practices and ethics in the conduct of the business and operations of the Company, its subsidiaries and affiliates.

Pursuant to the Charter of the Audit Committee of the Board of Directors of the Company (the "**Board**") and applicable regulatory requirements, it is the policy of the Company to establish, maintain, and develop procedures for a confidential and anonymous complaint procedure to facilitate (1) the receipt, retention, and treatment of questions and issues received by the Company regarding the Company's accounting, internal accounting controls, auditing matters, and the Code, and (2) the confidential, anonymous submission by directors, officers, or employees of the Company and any other stakeholders (the "**Subject Persons**"), of questions and issues regarding questionable accounting or auditing matters or violations of the Code. To meet these needs, the Company has developed this Whistleblower Policy (the "**Policy**").

2. CONDUCT COVERED BY THIS POLICY

Examples of matters that might form the basis for a report under this Policy include:

(a) questions and issues regarding the Company's compliance with Accounting Standards, including:

- financial disclosure regarding the Company or any of its subsidiaries;
- fraud or deliberate misstatement in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud or deliberate misstatement in the recording and maintaining of financial records of the Company;
- deficiencies in or non-compliance with the Company's internal policies and controls;
- misrepresentation or a false statement by or to a director, officer, or employee of the Company or any of its subsidiaries regarding a matter contained in the financial records or audit reports; or
- deviation from full and fair reporting of the Company's financial condition;

(b) questions and issues regarding non-compliance with the Code, including violations of any corporate policies and violations of laws and governmental regulations, including without limitation, health and safety, environmental, operational, or ethical matters; or

(c) retaliation on any Subject Person who makes a complaint pursuant to this Policy in good faith reasonably believing it to be substantially true, or who assists in good faith with any investigation or proceeding relating to a complaint made pursuant to this Policy.

3. COMMUNICATION OF THIS WHISTLEBLOWER POLICY

To ensure that Subject Persons are aware of this Policy, a copy of this Policy will be distributed to all Subject Persons. All Subject Persons will be informed whenever significant changes have been made to this Policy. All new Subject Persons will be provided with a copy of this Policy together with the *Code of Business Conduct and Ethics* and advised of its importance. Any other stakeholders can refer to the Company website page for updated information on this Policy.

4. REPORTING RESPONSIBILITY

Any person with a complaint or concern about conduct required to be reported under this Policy should first consider seeking guidance from the person in charge of the department or group of the Company where the concern originated. Accordingly, persons in a supervisory or management position should ensure that employees under their supervision are aware of this Policy and are familiar with the mechanisms available to report any suspected wrongdoings.

Where it is not possible for a Subject Person to raise the concern with his or her supervisor, or where a Subject Person does not feel comfortable doing so, concerns regarding suspected wrongdoings should be communicated (which may be done anonymously as set forth below) to the Chair of the Audit Committee by one of the following methods:

(a) By telephone, email, or online on a **confidential and anonymous** basis through a third-party hotline service contracted to handle any complaint on a confidential and anonymous basis which is unrelated to the Company and reports directly to the Chair of the Audit Committee by:

Telephone:

Call 1-800-916-7037 in North America and enter the Company Identifier: 6342.

OR

Online:

https://irdirect.net/NFGC/whistleblower iframe/

OR

(b) In writing to the Chair of the Audit Committee of the Board as follows:

Confidential
Chair, Audit Committee
New Found Gold Corp.
1133 Melville Street, Suite 3500
Vancouver, BC V6E 4E5
Canada

Complaints regarding an alleged violation or concern should be based on fact rather than speculation and should include as much specific information as possible, including sufficient corroborating information to support the commencement of an investigation. The Company may determine not to commence an investigation if a complaint contains unspecified or broad allegations of wrongdoing without factual support.

5. CONFIDENTIALITY

When reporting concerns, the Company prefers that the complainant identify him or herself to facilitate the Company's ability to take appropriate steps to address the report, including conducting any appropriate investigation. However, the Company also recognizes that some people may feel more comfortable reporting a suspected violation anonymously. If the complainant wishes to remain anonymous, he or she may do so, and the Company will use reasonable efforts to protect the confidentiality of the reporting person, subject to applicable law, rule or regulation or to any applicable legal proceedings.

6. NO RETALIATION OR ADVERSE CONSEQUENCES

No Subject Person who in good faith (a) raises questions or issues regarding the Company's compliance with Accounting Standards, (b) reports a violation of the Code, laws, policies or regulations, or (c) provides assistance to the Audit Committee, management of the Company, or any other person or regulatory or law enforcement body regarding such a report, shall suffer harassment, retaliation, or adverse employment consequences. 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.

7. ACTING IN GOOD FAITH

This Policy is intended to encourage and enable Subject Persons to raise serious concerns within the Company rather than seeking resolution outside the Company. Anyone filing a report must be acting in good faith and have reasonable grounds for filing a report. Any allegations that prove not to be substantiated and that have been made maliciously or knowingly to be false will be viewed as a serious offence and the reporting individual could be subject to disciplinary action up to and including dismissal for cause.

8. TREATMENT AND INVESTIGATION OF COMPLAINTS

The Chair of the Audit Committee shall promptly investigate each reported incident. In conducting his or her investigation, the Chair of the Audit Committee may enlist employees of the Company and/or outside legal, accounting, or other advisors, as deemed appropriate by the Chair of the Audit Committee. It is the obligation of all Subject Persons to cooperate in any investigation conducted as a result of a complaint made pursuant to this Policy. An investigation may include discussions with the complainant (unless the complaint was submitted on an anonymous basis), the party against whom allegations have been made and witnesses, as appropriate.

Concerns will be investigated as quickly as possible. The nature of the complaint may necessitate the Company to refer the matter to an external agency, which may lead to an extension of the investigation process. Further, the complexity of the complaint may increase the time it takes to investigate it.

The Company will strive to conduct all investigations pursuant to this Policy in a confidential manner. Information regarding a complaint, including the identity of the complainant, will only be disclosed to persons that specifically need to know such information, or as otherwise required or permitted by applicable laws. Where possible, the final determination/decision of an investigation will be communicated to the person who brought forth the applicable complaint.

9. REMEDIAL ACTION REPORTING AND RETENTION OF COMPLAINTS

At the conclusion of any review or investigation of a complaint that the Chair of the Audit Committee determined was made in good faith, the Chair of the Audit Committee shall report such findings to the Audit Committee. The Audit Committee, with the input of the Company's management, if requested, will determine the validity of a complaint and whether any remedial action is appropriate. The Chair of the Audit Committee shall promptly inform the Board of such proposed remedial action in a written letter.

The Chair of the Audit Committee must provide a written report to the Board on any complaints received pursuant to this Policy on a quarterly basis. The Company shall retain records of any such complaints, including documentation outlining any investigations or actions taken, for a period of no less than seven (7) years.

10. ENFORCEMENT

It is a condition of the appointment, employment, or engagement of all Subject Persons that they always abide by the standards, requirements, and procedures set out in this Policy. Any such person who violates this Policy may face disciplinary action up to and including termination for cause without notice of his or her employment or appointment with or engagement by the Company.

Failure to read or understand this Policy does not excuse you from compliance with this Policy.

11. REVIEW OF POLICY

The Audit Committee will review and evaluate this Policy on an annual basis to determine whether the Policy is effective in providing appropriate procedures to report violations or complaints regarding Accounting Standards or the Code. The Audit Committee will submit any recommended changes to the Board for approval.

12. QUERIES

Questions about how this Policy should be followed in a particular case can be reviewed with the Chair of the Audit Committee.

Original Approval Date: December 7, 2021

Amended: March 18, 2026

Approved by: Board of Directors