

LXRANDCO, INC.
(the “Corporation”)

INSIDER TRADING POLICY

This Insider Trading Policy (the “Policy”) was adopted by the board of directors of the Corporation on August 14, 2017 and as further amended on July 2, 2020.

Insider trading is illegal and will not be tolerated by the corporation. Specifically this means that no one with any knowledge of a material fact or a material change in the affairs of the Corporation that has not been generally disclosed to the public should purchase or sell any securities of the Corporation, inform anyone of such material fact or material change (other than in the necessary course of business) or advise anyone to purchase, sell, hold or exchange securities of the Corporation (or any other securities whose price or value may reasonably be expected to be affected by material changes affecting the Corporation) until the information has been generally disclosed to the public and sufficient time has elapsed for such information to have been adequately disseminated to the public.

Guidelines

For the purpose of implementing the foregoing principles, the following guidelines have been adopted. These guidelines should be followed by all members of the board of directors, officers and employees of the Corporation and its subsidiaries and their respective associates (including immediate family members who reside in the same home as that person) (“LXR Personnel”). Compliance with these procedures means there may be times when LXR Personnel would like to trade securities but will be precluded from doing so. As a result, they may be unable to realize certain gains or avoid certain losses. Personal financial circumstances or emergencies do not excuse violations of this policy.

To limit the possibility of any suspicion of improper trading, LXR Personnel should:

1. trade in the securities of the Corporation (which include securities exchangeable into securities of the Corporation and related financial instruments) only for investment, and not speculative, purposes;
2. not undertake any trade (purchase or sale) of the securities of the Corporation without first sending an email setting out details of such proposed trade to the Chief Financial officer of the Corporation, Nadine Eap nadine.e@lxrco.com
3. ensure purchases and sales of securities of the Corporation are not made from **the end of each of the fiscal quarters until 48 hours after the general release of the financial results for the quarter and may not be made from the end of each fiscal year until 48 hours after the general release of the financial results for the year;**
4. not purchase or sell securities of the Corporation with the knowledge of a material change in the affairs of the Corporation for at least 48 hours after the widespread public release of such change; and

5. until the widespread public release of a material fact or material change in the affairs of the Corporation, not inform any other person about such fact or change or discuss it with anyone other than in the necessary course of business.

“Material Change”

A “material change” in the affairs of the Corporation means a change in the business, operations or capital of the Corporation that could reasonably be expected to have a significant effect on the market price or value of any of the securities of the Corporation. A “material change” includes a decision to make such a change by the board of directors or by senior management of the Corporation who believe that board confirmation is probable. A “material fact” means a fact that would reasonably be expected to have a significant effect on the market price or value of the Corporation’s securities. Material facts and material changes are collectively referred to in this Policy as “material information”. Persons subject to this Policy shall also not engage in any of the following activities with respect to securities of the Corporation:

1. Short sales of securities of the Corporation. This involves selling securities of the Corporation a LXR Personnel does not currently own in the expectation that the price of the security will fall, or as part of a hedge or arbitrage transaction.
2. Buying or selling put or call options on securities of the Corporation, or entering into other derivative contracts or hedging transactions. This includes options trading on any of the stock exchanges or futures exchanges, as well as customized derivative or hedging transactions with third parties.

Notification of Trades by Restricted Persons

In addition to the above general guidelines applicable to everyone involved with the Corporation, all members of the board of directors, officers and employees who are routinely in possession of undisclosed material information (“**restricted persons**”) shall be required to inform the Chief Financial Officer of the Corporation (or in the case of the Chief Financial Officer, the Chief Executive Officer) in writing prior to engaging in any trade of securities of the Corporation.

Potential Sanctions

There are substantial statutory penalties for persons or companies where there has been a breach of the insider trading legislation. These penalties include fines up to \$5 million (or triple any profit made or loss avoided by such contravention, whichever is greater), and prison terms of up to five years. In addition to statutory penalties, insider trading could cause the Corporation acute embarrassment and may result in disciplinary action against any employee who violates this Policy, which may include in termination of employment.

This Policy may not cover all circumstances and exceptions may be justified from time to time. Any questions and all requests for exceptions from this Policy should be addressed to the Corporation’s Chief Financial Officer, following which management will determine whether or not it is appropriate to vary the Policy in such circumstances.