



## SHARE OWNERSHIP POLICY

### 1. Introduction

This constitutes the share ownership policy (this “**Policy**”) of EcoSynthetix Inc. (the “**Company**”). This Policy is intended to align the interests of the Chief Executive Officer and executive leadership team members of the Company (collectively the “**executive officers**”) with those of the Company’s shareholders by requiring such persons to own a significant number of common shares of the Company (“**Common Shares**”).

### 2. Common Share Ownership

For the purposes of determining Common Share ownership of a particular executive officer, Common Shares and restricted share units owned directly by such individual, such individual’s spouse, any minor children that share the same home as such individual, any trust in which the individual and/or the individual’s spouse is a trustee with voting and investment power, and any private corporate entity which is at least 50% owned by any combination of the foregoing, are included.

Common Shares issuable upon the exercise of stock options (whether or not such stock options have vested), common share purchase warrants or any other convertible securities of the Company (other than restricted share units) shall not be treated as Common Shares owned by such individual for the purposes of this Policy.

### 3. Ownership Requirements

- a) The Chief Executive Officer is required to hold Common Shares having an aggregate value of at least 2 times his or her annual base salary as at the date the individual first became an executive officer.
- b) Each of the Company’s executive leadership team members are required to hold Common Shares having an aggregate value of at least 1 times his or her annual base salary as at the date the individual first became an executive officer.
- c) Executive officers will be deemed to have satisfied the applicable ownership guidelines specified in a) and b) above (the “**Relevant Threshold**”) following the date on which the either the: (A) aggregate price paid by the executive officer for Common Shares equals or exceeds the Relevant Threshold; or (B) the fair market value of the outstanding Common Shares held by the executive officer equals or exceeds the Relevant Threshold.

### 4. Compliance

Executive officers are required to comply with this Policy by the fifth (5<sup>th</sup>) anniversary of the later of the date of such individual’s date of hire and the date of implementation of this Policy.

### 5. Policy Review

The Board of Directors, or any committee thereof, will review and evaluate this Policy on an annual basis.

Adopted by the Board of Directors of the Company effective as of March 2, 2018.