

**STORNOWAY DIAMOND CORPORATION  
CONFIDENTIALITY POLICY – INVITEE**

---

As a public company, Stornoway Diamond Corporation and its non-public subsidiary companies (collectively, “Stornoway” or the “Corporation”) have an obligation to ensure that all communication of information about the Corporation is timely, factual, accurate and in compliance with the applicable securities rules, regulations and legislation. Failure to fulfill this obligation may result in significant liability for and sanctions against Stornoway and, in some instances, certain individuals who provide services to the Corporation or its subsidiaries.

During the course of your access to the exploration sites of Stornoway or while during the provision of contract services to Stornoway, you are considered to be an “Invitee” and you may have access to, or become aware of, confidential information or information that is proprietary to the Corporation. Such information includes, but is not limited to:

information regarding (i) current or future exploration plans and results, (ii) forecasts or projections, (iii) mergers, acquisitions, tender offers, joint ventures or changes in assets, (iv) changes in control, (v) significant new property acquisitions or dispositions, (vi) significant developments regarding projects, (vii) bankruptcies or receiverships (viii) changes in the Board, executive management or other senior personnel, (ix) changes of auditors or to the auditors' report to the shareholders, (x) significant events regarding Stornoway’s securities (such as repurchase plans, stock splits, changes in rights of security holders, public or private sales of additional securities, and the like), (xi) changes to accounting policies, (xii) changes in rating agency decisions, (xiii) exceptions to corporate ethics or conduct practices that are put in place for key employees, which have not previously been disclosed to the public and (xiv) information regarding the Corporation’s data collection, processing, enhancement and storage techniques and methods. This list is not exhaustive, but is intended to provide examples of confidential information.

As an Invitee, you agree that you will not tip, discuss or disclose, directly or indirectly, such confidential or proprietary information by any means including, but not limited to: by telephone, fax, email, or through the use of the internet (including social networking sites)

*The foregoing will not apply to information which has been fully disclosed and where a reasonable period of time has passed for the information to be widely disseminated (i.e. at least one full business day following a public announcement) or where disclosure is required by law.*

It is illegal for anyone to buy or sell securities, either directly or indirectly, with knowledge of undisclosed material information affecting Stornoway or any other company with whom Stornoway has a relationship. Contravention of insider trading or tipping laws may result in civil and criminal penalties and termination of your Invitee status.

Failure to comply with the above terms may result in the termination of your Invitee status with the Corporation without notice.

I certify that I understand Stornoway’s terms and conditions as set out above and I agree to abide by the terms and intent of Stornoway’s confidentiality policy.

SIGNED: \_\_\_\_\_ this \_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_.

PRINT NAME: \_\_\_\_\_