POLICY CONCERNING CONFIDENTIALITY, FAIR DISCLOSURE AND TRADING IN SECURITIES

BACKGROUND

Securities legislation and the rules of stock exchanges on which securities of Medical Facilities Corporation (the "**Company**") are listed impose various requirements on the Company, its subsidiaries and affiliates, their respective directors, officers and employees and other persons in similar relationships with the Company, its subsidiaries and affiliates (collectively, "**MFC Personnel**") that are intended to ensure that:

- Individuals in a "special relationship" with the Company, its subsidiaries and affiliates (collectively, the "**MFC Group**") do not trade in the securities of the Company when they are in possession of material, non-public information;

- Those individuals do not pass on or "tip" that material, non-public information to others; and

- More generally, there is no "selective disclosure" of material information, with the result that it is accessible to some market participants but not others.

This Policy is intended to help to ensure that the MFC Group and MFC Personnel comply with these requirements by setting out procedures and guidelines for:

- Dealing on a day-to-day basis with confidential information;

- Disclosing (and monitoring the disclosure of) material information on a timely basis in a manner that is broadly accessible on a non-exclusionary basis by all market participants; and

- Restricting trading by MFC Personnel in securities of the Company and other issuers ("**Special Relationship Issuers**") in respect of which MFC Personnel may receive material, non-public information while representing the MFC Group, if the MFC Personnel are in possession of material, non-public information concerning the MFC Group or Special Relationship Issuer.

The consequences of improper disclosure, trading or tipping (or suspicion of any of those activities) are serious, both for the individual involved and the Company. Breach of the applicable laws and regulations may involve both civil and criminal penalties, and the monetary and reputational cost of an actual or suspected breach may be significant.

This Policy is to be delivered to all MFC Personnel upon its adoption and to all new MFC Personnel at the start of their employment or other relationship with the MFC Group. MFC Personnel are responsible for ensuring compliance with this Policy by their families and other members of their households and entities over which they exercise voting or investment control.

The Company may change this Policy and the procedures that it contemplates as appropriate to carry out the purposes of this Policy and applicable legal requirements.

PROCEDURES AND GUIDELINES GOVERNING CONFIDENTIALITY

Principles of Confidentiality

All inquiries from outsiders regarding confidential or material, non-public information about the MFC Group should be referred to one of the Chief Executive Officer ("**CEO**") or the Chief Financial Officer ("**CFO**"), who will arrange a response.

The protection of confidentiality is vital to the operations and affairs of the MFC Group. In addition, securities legislation expressly prohibits MFC Personnel from disclosing material, non-public information concerning the MFC Group or any Special Relationship Issuer to any person (including, among others, family members, analysts, individual investors and members of the investment community and news media), except in the necessary course of business.

Because it may be difficult to determine what information is confidential, all information received by and relating to the MFC Group (as well as information learned about others while acting on behalf of the MFC Group) should be treated as if it were confidential. As a general guideline, MFC Personnel should not discuss the affairs of the MFC Group or Special Relationship Issuers with, or make information about the MFC Group or Special Relationship Issuers available to, outsiders. Except as contemplated in this Policy under "Procedures and Guidelines Governing Disclosure", no MFC Personnel should disclose any confidential information or material, non-public information unless that disclosure is required as part of his or her regular duties. Efforts should be made to limit access to confidential information to only those who need to know the information and those persons should be advised that the information is to be kept confidential. Where that information is to be disclosed to third parties, the MFC Group may want to take specific steps to preserve the confidentiality of the information, including requiring the recipient of the information to sign an appropriate form of confidentiality agreement. Third parties should be told that they must not divulge this information to anyone else, other than in the necessary course of business and that they may not trade in the Company's securities until the information is publicly disclosed.

No MFC Personnel should provide trading advice of any kind about the Company to anyone at any time, but particularly while possessing material, non-public information about the MFC Group, except that MFC Personnel should advise others not to trade if that trading might violate applicable laws or regulations or this Policy.

Guidelines for Maintaining Confidentiality

General Guidelines. To protect the confidentiality of information, the following general guidelines should be followed on all matters. More stringent measures may be adopted for particularly sensitive matters at the discretion of the responsible individual:

- Only those third parties that clearly have been authorized should be provided with confidential information.

- Confidential information should not be discussed in public places such as elevators, hallways, restaurants, health clubs, taxis or the subway or while using cellular or radio telephones.

- Documents and files containing confidential information should be kept in a safe place, with access restricted to individuals who "need to know" that information in the necessary course of business.

- Documents containing confidential information should not be read, discarded or carried in public places in a manner that others also might read them.

- Documents containing confidential information should not be left unattended in public places or other places to which there may be public access, such as meeting rooms, reception areas, unlocked offices or washrooms.

- Persons from outside the MFC Group should not be allowed to use or be in an area (like an employee's office or the trading floor) unattended where documents containing confidential information might be read by them.

- Persons from outside the MFC Group should not be told whether a "trading blackout period" has been designated under this Policy.

- The whereabouts of MFC Personnel outside the office or the fact that visitors are in the office should not be disclosed to outsiders. (Any person receiving a request should agree to contact the employee and relay the message.)

- All non-public documents should be destroyed in accordance with the Company's Document Retention Policy.

Special Measures. While judgment and care should be exercised at all times, the individual responsible for a particularly sensitive matter should consider whether other steps would be appropriate to minimize the risk of the confidentiality of information being compromised. Those steps might include:

- Restricting access to the information within the MFC Group.

- Marking all envelopes or packages containing sensitive materials as confidential and for opening by the addressee only.

- Securing or coding all communications that will be sent by fax or e-mail.

- Storing sensitive information on computers in a manner that limits the risk that unauthorized operators might gain access.

- Logging-off computers when away from the terminal for any substantial period.

- Not leaving cellular phones, laptops, tablets or iPads unattended in airports, airplanes, buses, trains or other public places.

- Omitting names of parties and other identifying information from preliminary drafts of documents for sensitive matters.

- Holding of telephone and other conversations (and particularly those on speaker phones) regarding a confidential matter behind closed doors.

- Advising others if you are using a cellular or radio telephone so that no sensitive information is discussed.

- Assigning to any new confidential matter a code or other non-identifying name.

PROCEDURES AND GUIDELINES GOVERNING DISCLOSURE

Disclosure Principles

It is a basic principle of securities regulation that all persons investing in securities should have equal access to information that may affect their investment decisions. Public companies in Canada are required to promptly disclose all material information.

The Board of Directors of the Company is committed to an effective communications and disclosure policy for the benefit of all stakeholders, including shareholders, suppliers, guests, governmental authorities, employees and market participants that is consistent with all applicable laws, regulations and policies.

Guidelines for Disclosure

Timely Disclosure. The Company shall disclose all material information on a timely basis as required by all applicable laws, regulations and policies, via news release.

Open Disclosure. The Company shall use all reasonable efforts to ensure that any material information that is disclosed is distributed on a broad, non-exclusionary basis so as to avoid "selective disclosure" of the information. The Company may, however, in the necessary course of its business, disclose such information:

- To persons subject to duties of trust or confidence (such as lawyers, bankers and accountants);

- To persons who agree to maintain the information in confidence;

- To credit rating agencies;
- In connection with securities offerings; or
- As otherwise required by applicable laws or regulations or similar requirements of authorities with appropriate jurisdiction.

Disclosure must include any information the omission of which would make the rest of the disclosure misleading (half truths are misleading). Unfavourable material information must be disclosed as promptly and completely as favourable information. Disclosure should be consistent among all audiences, including the investment community, the media, customers and employees. Disclosure must be corrected immediately if the Company subsequently learns that earlier disclosure contained a material error at the time it was given.

In certain circumstances, it may be determined that such disclosure would be unduly detrimental to the Company (for example, if release of the information would prejudice negotiations in a corporate transaction), in which case the information will be kept confidential until it is determined that it is appropriate to publicly disclose. In these circumstances, a confidential material change report should be filed with the applicable securities regulators, and the Company should periodically (at least every 10 days) review its decision to keep the information confidential.

The Company should hold regular information meetings or calls after the release of quarterly and annual results. Additional meetings or calls may be held in association with the release of other information by the Company. These meetings and calls are intended to facilitate a dialogue between the Company and the investment community and should be open to the public. The information proposed to be provided by the Company at these meetings and calls should be reviewed by at least one of the CEO or CFO in advance of the meeting or call. The call should be preceded by a news release containing all relevant material information. At the beginning of the call, a Company spokesperson should provide appropriate cautionary language regarding any forward-looking information and direct participants to publicly available documents containing the assumptions, sensitivities and a full discussion of the risks and uncertainties applicable to the news.

The Company should provide advance notice of the conference call and webcast by issuing a news release announcing the date, time and topic and providing information on how interested parties may access the call and webcast. These details should be provided on the Company's website. In addition, the Company may send invitations to analysts, institutional investors, the media and others. Any non-material supplemental information provided to participants will also be posted to the website for others to view.

An archived audio webcast will be made available on the Company's website for a minimum of 90 days.

The CFO should review the subject matter of the conference call and if it is determined that selective disclosure of previously undisclosed material information has occurred, the Company will immediately disclose the information broadly via news release.

Use of the Website. To increase the accessibility of information, all material information disseminated by the Company should be posted on the Company's website (or, in the case of documents filed with regulators, links may be provided to sites on which those documents are available). The MFC Group's CFO will have primary responsibility for oversight of the review of the website on a regular basis to recommend changes to ensure that it does not contain misrepresentations as a result of information that is, or is not, available on or through the site.

Disclosure on the Company's website alone does not constitute adequate disclosure of information that is considered material non-public information. Any disclosures of material information on the website will be preceded by the issuance of a news release.

All continuous disclosure documents will be posted in the investor section of the Company's website. All information posted, including text and audiovisual material, will show the date the material was issued. Any material changes in information must be updated immediately, following issuance of a news release. The website will include a notice that advises the reader that the information was accurate at the time of posting, but may be superseded by subsequent disclosures.

The Company will maintain a log indicating the date that material information is posted and/or removed from the website. Documents filed with securities regulators will be maintained on the website for a minimum of two years.

The MFC Group's CFO must approve all links from the Company website to third-party websites. The website will include a notice that advises readers they are leaving the Company's website and that the Company is not responsible for the contents of the other site.

The MFC Group's CFO or designated investor relations firm will also be responsible for responses to electronic inquiries. Only public information or information that could otherwise be disclosed in accordance with the Company's Disclosure Policy shall be used to respond to electronic inquiries.

The MFC Group should maintain in an archive a copy of all material information that has been posted on the website for at least five years after its removal from the site.

In accordance with the Company's Disclosure Policy, employees (including designated spokespersons) are prohibited from participating in Internet chat rooms, newsgroup or social media discussions on matters pertaining to the Company's activities or its securities.

Analysts' Reports. Any communication concerning or review of an analyst's report concerning the Company should be limited to reviewing factual information to point out inaccuracies with respect to, or omissions from, recently released public information or to identify recently disclosed factual information that may affect the analyst's model and should not confirm the analyst's estimate or that any estimate is too high or too low, whether directly or indirectly through implied guidance. No MFC Personnel should:

- Permit an analyst to quote an officer of the MFC Group or directly attribute information to the MFC Group (except to the extent the quote or other information is contained in a news release issued by the Company or another document issued by the Company that is publicly available);

- Circulate analysts' reports relating to the Company to current or potential investors;

- Quote or cite an analyst's report or cause it to be "hyperlinked" to the MFC Group's website; or

- Without prior approval of the Company's Board, publicly comment on an analyst's report.

Notwithstanding the foregoing, the Company will distribute analyst reports to its directors and senior officers to monitor the communications of the Company and to assist them in understanding how the marketplace values the Company and how corporate developments affect the analysis. Analyst reports may also be provided to the Company's financial and professional advisors in the necessary course of business. The Company may post on its website a complete listing, regardless of the recommendation, of all the investment firms and analysts who provide research coverage on the Company. If provided, this list will not include links to the analysts' or any other third party websites or publications.

Providing Guidance. The Company will try to ensure, through its regular public dissemination of quantitative and qualitative information, that analysts' estimates are in line with the Company's expectations. The Company will not confirm, or attempt to influence, an analyst's opinions or conclusions and will not express comfort with analysts' financial models and earnings estimates.

If the Company has determined that it will be reporting results materially below or above publicly held expectations, it may decide to disclose this information in a news release to enable discussion without risk of selective disclosure (see "Forward-Looking Information").

Involvement of the Board of Directors. The Board of Directors or the Audit Committee should review all news releases that disclose financial results and all other material, non-routine releases.

Communication on Behalf of the Company. The only individuals that should communicate with regulators, securities market professionals (investment dealers, bankers and advisers, institutional investment managers or investment companies, rating agencies, investment analysts), investors or the media are the Chair of the Board, the CEO, the CFO, or another person expressly approved by the CEO or the CFO for that purpose (collectively, the "**Authorized Officers**"). All information requests from securities market professionals or investors should be referred to one of the Authorized Officers to speak on the Company's behalf. At least two Authorized Officers should be involved in any meetings or calls with securities markets professionals and investors.

The Authorized Officers, with the assistance of other senior officers, should be available to investors to hear, understand and address any questions or concerns that they may have. All material questions and concerns raised by investors should be reported to the Board of Directors on a periodic basis.

Employees who are not Authorized Officers may not respond under any circumstances to inquiries from the investment community, the media or others, unless specifically asked to do so by an Authorized Officer.

Records of Disclosure. Each of the Authorized Officers will maintain a five-year record of all public information about the Company, including continuous disclosure documents, news releases,

analysts' reports, transcripts or tape recordings of conference calls, debriefing notes, notes from meetings and telephone conversations with analysts and investors, and newspaper articles.

Material Information

In general terms, material information includes any information that:

- Results, or could reasonably be expected to result, in a significant change in the market price or value of any of the Company's securities; or

- There is a substantial likelihood would be considered by a reasonable shareholder to be important in making an investment decision in relation to the Company's securities.

Both positive and negative information may be material.

While it is not possible to identify all information that would be considered to be "material", the following types of information ordinarily would be considered material and should be disclosed to the public, unless the Company determines such information is not material given the applicable circumstance:

- Financial performance, especially quarterly and year-end earnings, and significant changes in financial performance or liquidity;

- Company projections and strategic plans;

- Changes in the local, state and federal legislation that could affect operations of the subsidiaries;

- Changes in relations with current and potential payors, including proposed or pending changes in provider contracts that are material and could impact the operating subsidiaries operations and financial results, as well as changes in material contracts and agreements not made in the ordinary course of business;

- Changes in local market conditions and other significant changes in business or operations;

- Changes in control of the Company, or any changes to the Company's certificate of incorporation, bylaws, fiscal year end or code of ethics;

- Potential take-over bids, issuer bids, mergers and acquisitions or the purchase by, or sale of, the MFC Group's assets;

- Significant changes in management;

- Major labour disputes or disputes with major contractors or suppliers;

- Changes in ownership structure that may affect control of the MFC Group;

- Significant borrowings or public or private equity/debt offerings;

- Imposition or creation of a direct financial obligation or a financial obligation under an "off balance sheet arrangement" that could be material to the Company;

- Events that would accelerate or increase a direct financial obligation that is material to the Company;

- Changes in the Company's capital structure, or changes in Company dividend policies or amounts;

- Changes in auditors, or non-reliance on previously issued financial statements or a related audit report or completed quarterly review;

- Directors or principal officers joining or leaving the Company; and

- Actual or threatened litigation or significant regulatory action involving the Company and its subsidiaries or persons or entities related to the Company and its subsidiaries that might impact the Company and its subsidiaries, or the resolution of such litigation or regulatory action.

News Releases

Once the CEO or the CFO determines that a development is material, the issuance of a news release will be authorized unless it is determined that such developments should remain confidential for the time being. If developments are to remain confidential, appropriate confidential filings should be made and control of the insider information should be instituted. Should a material statement inadvertently be made in a selective forum, the Company should immediately issue a news release to fully disclose that information.

If the stock exchange upon which shares of the Company are listed is open for trading at the time of a proposed announcement, prior notice of a news release announcing material information should be provided to its market surveillance division to enable a trading halt, if deemed necessary by the stock exchange. If a news release announcing material information is issued outside of trading hours, the exchange must be notified promptly and in any event before the market reopens.

News releases should be disseminated through an approved news wire service that provides simultaneous national distribution. Full-text news releases will be transmitted to all stock exchange members, relevant regulatory bodies, major business wires, national financial media, and the local media in areas where the Company has its headquarters and operations.

News releases will be posted on the Company's website immediately after confirmation of dissemination over the news wire. The website will include a notice that advises the reader that the information posted was accurate at the time of posting, but may be superseded by subsequent disclosures.

Non-Public Information

Information generally is "non-public" if it has not been widely disseminated through major newswire services, national news services and financial services. For the purposes of this Policy,

information will be considered public (no longer "non-public") after the close of trading on the second full trading day following the widespread public release of the information.

Forward-Looking Information

Should the Company elect or disclose forward-looking information in continuous disclosure documents, speeches, conference calls or otherwise, the following guidelines should be observed:

- The information, if deemed material, must be broadly disseminated via news release, in accordance with this Policy;

- The information must be clearly identified as forward looking;

- The Company must identify all material assumptions used in the preparation of the forward-looking information;

- The information must be accompanied by a statement that identifies, in very specific terms, the risk and uncertainties that may cause the actual results to differ materially from those projected, including a sensitivity analysis to indicate the extent to which different business conditions from the underlying assumptions may affect the actual outcome; and

- The information must be accompanied by a statement that disclaims the Company's intention or obligation to update or revise the forward-looking information, whether as a result of new information, future events or otherwise. Notwithstanding this disclaimer, should subsequent events prove past statements about current trends to be materially off target, the Company may choose to issue a news release explaining the reasons for the difference and updating its guidance on the anticipated impact on revenue and earnings.

Rumours

The Company does not comment, affirmatively or negatively, on rumours. This also applies to rumours on the Internet, including social media. An Authorized Officer will respond consistently to any rumours, saying, "It is our policy not to comment on market rumours or speculation."

Should the stock exchange request that the Company make a definitive statement in response to a market rumour that is causing significant volatility in the stock, the Disclosure Committee will consider the matter and decide whether to make a policy exception. If the rumour is true in whole or in part, this may be evidence of a leak, and the Company will immediately issue a news release disclosing the relevant material information.

Contacts with Analysts, Investors and the Media

Disclosure in individual or group meetings does not constitute adequate disclosure of information that is considered material non-public information. If the Company intends to announce material information at an analyst or shareholder meeting or a press conference or conference call, the announcement must be preceded by a news release.

The Company recognizes that meetings with analysts and significant investors are an important element of its investor relations program. The Company will meet with analysts and investors individually or in small groups as needed and will initiate contacts or respond to analyst and investor calls in a timely, consistent and accurate fashion in accordance with this disclosure policy. All analysts will receive fair treatment regardless of whether they are recommending buying or selling the Company's securities.

The Company will provide only non-material information through individual and group meetings, in addition to publicly disclosed information, recognizing that an analyst or investor may construct this information into a mosaic that could result in material information. The Company cannot alter the materiality of information by breaking down the information into smaller, non-material components.

The Company will provide the same sort of detailed, non-material information to individual investors or reporters that it has provided to analysts and institutional investors and may post this information on its website.

Spokespersons will keep notes of telephone conversations with analysts and investors and where practicable more than one Company representative will be present at all individual and group meetings. A debriefing will be held after these meetings and if it is determined that selective disclosure of previously undisclosed material information has occurred, the Company will immediately disclose the information broadly via news release.

Quiet Periods

To avoid the potential for selective disclosure or even the perception or appearance of selective disclosure, the Company will observe quiet periods prior to quarterly earnings announcements or when material changes are pending. Regular quiet periods will commence on the first day following the end of a quarter and end with the issuance of a news release disclosing results for the quarter just ended.

During a quiet period, the Company will not initiate any meetings or telephone contacts with analysts and investors, but will respond to unsolicited inquiries concerning factual matters. If the Company is invited to participate, during a quiet period, in investment meetings or conferences organized by others, the Disclosure Committee will determine, on a case-by-case basis, if it is advisable to accept these invitations. If accepted, extreme caution will be exercised to avoid selective disclosure of any material, non-public information.

PROCEDURES AND GUIDELINES GOVERNING TRADING

It is illegal for anyone with knowledge of material information affecting a public company that has not been publicly disclosed to purchase or sell securities of that company. It is also illegal for anyone to inform any other person of material non-public information, except in the necessary course of business. Therefore, insiders and employees with knowledge of confidential or material information about the Company or counter-parties in negotiations of potentially material transactions are prohibited from trading securities of the Company or any counter-party until the

information has been fully disclosed and a reasonable period has passed for the information to be widely disseminated.

Insiders are personally responsible for filing accurate and timely insider trading reports. Insiders are required to provide a copy of all insider reports to the CEO or the CFO or other designated person concurrent with their filing to regulatory authorities. Please refer to the Company's Insider Reporting Policy for further details.

Trading For Speculative Purposes

To limit the possibility of any suspicion of improper trading, MFC Personnel should trade in securities of the Company or Special Relationship Issuers (including the exercise of stock options, exchange-traded options, calls or other derivative securities that are not issued by the Company or Special Relationship Issuer but are based on its securities, collectively "**Relevant Securities**") only for investment, and not speculative, purposes.

Other Prohibited Trading Activities

No MFC Personnel (and no venture capital fund or other entity in respect of which he or she has or shares voting or investment control or a significant financial interest) should trade in:

- Relevant Securities while in possession of material, non-public information concerning the MFC Group or other Special Relationship Issuer, notwithstanding that there may be an independent, justifiable reason for a purchase or sale;

- Company securities outside of the applicable "trading windows" or during any special "blackout periods" described below under "Trading Windows and Blackout Periods"; or

- Any interest or position relating to the future price of Relevant Securities, such as a put or short sale.

Trading Windows and Blackout Periods

Trading Windows for Insiders. Persons listed on Schedule A are considered to be insiders of the Company and, as such, are subject to a higher standard of scrutiny and disclosure requirements than other MFC Personnel who may trade in securities of the Company. These insiders may trade in securities of the Company only after obtaining approval from the CEO or the CFO in accordance with the procedures set out below under "Approval of Trades by Insiders".

Trading Windows for All Other MFC Personnel. All MFC Personnel who are not insiders may trade in Company's securities only during the period beginning after the Company's widespread public release of quarterly or year-end operating results, and ending at the close of trading on the last business day of the fiscal quarter.

No Trading During Trading Windows While in the Possession of Material, Non-Public Information. No MFC Personnel in possession of material, non-public information concerning the Company should trade in Company securities even during applicable windows. Persons possessing such information may trade once such information is considered public pursuant to this

policy (i.e., after the close of trading on the second full trading day following the widespread public release of the information).

No Trading during Blackout Periods. No MFC Personnel should trade in Company securities outside of the applicable trading windows or during any special blackout periods that the CEO or the CFO may designate and that will be communicated promptly on designation. No MFC Personnel should disclose to any outside third party that a special blackout period has been designated.

Approval of Trades by Insiders

No insider should trade in Company securities unless the trade (including the proposed number of securities and nature of the trade) has been approved by the CEO or by the CFO. The CEO should not trade in Company securities unless the proposed trade (including the number of securities and nature of the trade) has been approved by the CFO. Any trades that have been approved must be completed within five trading days (or such shorter period specified by the person approving the trade).

Statutory or Regulatory Trading Restrictions

The provisions of this Policy will be supplemented by any greater prohibitions or restrictions prescribed by any applicable laws, regulations or other instruments (for example, contractual restrictions on the sale of securities and restrictions on short-swing trading by insiders). Any MFC Personnel who is uncertain whether other prohibitions or restrictions apply should consult with the MFC Group's CEO or CFO.

Exceptions to Trading Restrictions

Exceptions from the trading restrictions outlined herein are provided where (i) the trade was made pursuant to participation in an automatic dividend reinvestment plan, security purchase plan or other similar automatic plan that was entered into by the person before acquiring knowledge of the material information that would otherwise preclude trading, or (ii) the trade constitutes settlement in the normal course of a legally binding obligation of purchase or sale entered into by the person before acquiring knowledge of the material information, or (iii) the trade is approved in writing by the CEO or by the CFO (and in the case of a trade by either of such officers, by the other).

POTENTIAL SANCTIONS

Civil, and Criminal Penalties

The consequences of improper trading or disclosure can be severe. Persons violating insider trading or tipping rules can be:

- Accountable to the issuer of the securities traded for any benefit or advantage received as a result of the purchase, sale or communication (i.e. any profit made or loss avoided);

- Liable to compensate the seller or purchaser of the securities traded from damages as a result of the trade; and

- Subject to criminal penalties up to the greater of three times the profit made or loss avoided or $1,000,000, as well as a jail term.

The Company may also be required to pay significant civil or criminal penalties and could, under certain circumstances, be subject to private lawsuits by contemporaneous traders for damages suffered as a result of illegal insider trading or tipping by persons under the Company's control.

MFC Group Discipline

Violation of this Policy or applicable laws or stock exchange requirements by any MFC Personnel may subject that person to disciplinary action by the MFC Group, which could include termination for cause.

Reporting of Violations

Any MFC Personnel who violate this Policy or any applicable laws, regulations or stock exchange requirements, or knows of any such potential violation by any other MFC Personnel, should report the violation immediately to the CEO or the CFO.

Cooperation with Authorities

It is the Company's policy to cooperate with any authority that has jurisdiction and is investigating any trading in the Company's securities, any trading activities by MFC Personnel or alleged improper disclosure by the Company or any MFC Personnel.

ADMINISTRATION OF THE POLICY

Responsible Officers

The CFO has been designated as the individual responsible to oversee the procedures and guidelines relating to timely and fair disclosure. In this context, the CFO will be responsible to administer, monitor and enforce compliance with applicable laws and regulations, as they relate to disclosure of information by the Company and recommend revisions to this Policy as necessary to reflect changes in applicable laws, regulations and policies.

Specifically, the CFO has been asked to:

- Administer and interpret this Policy and monitor compliance with its provisions;
- Respond (or co-ordinate responses to) all inquiries relating to this Policy;
- Ensure that copies of this Policy and other appropriate materials are provided to all current and new MFC Personnel, and such other persons who he or she determines may have access to material, non-public information concerning the MFC Group;
- Administer, monitor and enforce compliance with applicable laws and regulations and policies of the applicable regulatory authorities as they relate to the use of confidential

information and trading in securities of the Company and securities of Special Relationship Issuers;

- Recommend revisions to this Policy as necessary to reflect changes in applicable laws, regulations and policies; and

- Maintain a list of insiders of the Company and update that list periodically as necessary to reflect any additions or deletions.

Consult CEO or CFO for Guidance

Any MFC Personnel who are unsure about the application or interpretation of this Policy to a specific situation (including whether the information that they possess is material or non-public) should consult the CEO or the CFO.

SCHEDULE A

INSIDERS

As of November 2026

NAME OF INSIDER	POSITION
Medical Facilities Corporation	
Adina Storch	Director
Peter Brimm	Director
Michael Gisser	Director
Jeremy Klaperman	Director
Jason Redman	Director, President and Chief Executive Officer
David Watson	Chief Financial Officer
Hayk Nar	Vice-President of Finance
Syed Jafri	Consultant
Medical Facilities (USA) Holdings, Inc. and Medical Facilities America, Inc.	
Dr. R. Blake Curd	Director
Dr. Brad Thaemert	Director

Sioux Falls Specialty Hospital, LLP	
Dr. R. Blake Curd	Chief Executive Officer
Martin Appelhof	Chief Financial Officer
Dr. Michael Adler	Management Committee Member
Dr. Keith Baumgarten	Management Committee Member
Dr. Robert Heath	Management Committee Member
Dr. Darlys Hofer	Management Committee Member
Dr. Richard Howard	Management Committee Member
Dr. Peter Kasznica	Management Committee Member
Dr. Matthew McKenzie	Management Committee Member
Daniel Newell	Management Committee Member
Dr. Corey Rothrock	Management Committee Member
Dr. Kenneth Scott	Management Committee Member
Dr. Lauren Wood Thum	Management Committee Member
Dr. Greg Neely	Management Committee Member
Dr. Brian DeVries	Management Committee Member
Dr. David Jones	Management Committee Member