



Company Policy 7.0 Stock Trading Policy for Officers, Directors and Employees

INTRODUCTION Scope of the Policy

Altair Nanotechnologies Inc. (together with its subsidiaries, "Altair") is a public company whose common shares are traded on the NASDAQ Capital Market. To protect shareholders and prospective investors against fraud or other misuse of inside information in buying or selling securities, the U.S. federal securities laws restrict a person's ability to buy or sell securities of public companies while in possession of material nonpublic information about the company. Information is "material" if a reasonable investor would consider it important in a decision to buy, hold or sell securities of a company. In other words, material information is any information that could reasonably affect the value of the common shares. Common examples of information that will frequently be regarded as material are: yet-to-be announced financial information about a current or recent reporting period; projections of future earnings or losses; news of a pending or proposed merger, acquisition or tender offer; news of significant sales of assets or the disposition of a subsidiary; changes in dividend policies or the declaration of a stock split or the offering of additional securities; changes in management; significant new products or discoveries; impending bankruptcy or financial liquidity problems; and the gain or loss of a substantial customer or supplier. Either positive or negative information may be material.

Officers, directors, employees and others deemed to be Insiders under this policy ("Insiders") will frequently have information about Altair that is material but has not been disclosed to the public. Information becomes public when announced by Altair, usually by its distribution of a press release, filing of report or disclosure of the information in an earnings call or at a press conference. A purchase or sale of Altair common shares by any Insider could expose both Altair and the individual involved to a claim that the transaction was carried out improperly on the basis of inside information not known to the general public.

In the course of performing their duties on behalf of the company, Insiders may also obtain material nonpublic information relating to parties with whom Altair does business, including Altair's customers, vendors, suppliers and strategic partners ("Business Partners"). All Insiders should treat material nonpublic information about Altair's Business Partners with the same care required with respect to information related directly to Altair. Business Partners expect that material nonpublic information disclosed to Altair in the process of conducting business with Altair will be kept confidential and not exploited for securities trading purposes. In many instances, Altair has entered into confidentiality agreements with Business Partners prohibiting use or disclosure of such nonpublic information by any employees or affiliates of Altair. Consequently, any improper use may subject Altair to liability and jeopardize the continuing business relationship between Altair and the relevant Business Partner. Altair has produced a non-exhaustive list of Principal Business Partners that it has provided along with a copy of this policy and that it will update from time to time typically in connection with its notification of the opening of the window periods described below. The Chief Executive Officer or Chief Financial Officer of Altair may alter the list of Principal Business Partners at any time by providing email or other written notice of the change to all Insiders. Even if not on this list, any Business Partner of Altair about which Altair or any Insiders have material nonpublic information as a result of a past or existing business relationship is considered to be a "Principal Business Partner" for purposes of this policy. You should consult with the Chief Executive Officer or Chief Financial Officer prior to trading in the securities of any significant Business Partner.

Potential Liability and/or Disciplinary Action

Violations of the U.S. federal securities laws prohibiting use of material nonpublic information can have very serious consequences for Altair and the persons involved. Violations can carry both civil and criminal penalties, with criminal fines of up to \$1 million for individuals (\$2.5 million for Altair) and imprisonment for up to ten years. In addition, executive officers and directors are liable to Altair for any profits received from a purchase followed by a sale, or a sale followed by a purchase, of Altair securities within a period of less than six months. Violations of this policy or federal or state laws governing insider trading by any Insider may also result in dismissal proceedings or termination of employment, as applicable.

If securities transactions become the subject of scrutiny, they will be viewed after-the-fact with the benefit of hindsight. As a result, Insiders should carefully consider how regulators and others might view the transaction in hindsight before engaging in any transaction.

To reduce Altair's risk related to such claims, while considering the needs of Insiders for reasonable opportunities to purchase and sell securities of Altair and its Business Partners, Altair has adopted this policy. This policy applies to all officers, directors and employees of the Company, together with any non-employees providing supervised part-time or full-time service to Altair during the period of such service, all of whom are considered "Insiders" under this policy.

STATEMENT OF POLICY

This policy requires consultation with the Chief Executive Officer or the Chief Financial Officer for any Insider to buy or sell Altair securities or Business Partner securities (see Section 3 below).

The following guidelines apply to all Insiders covered by this policy:

1. Except as provided in Section 9 below, no Insider may buy or sell securities of Altair while possessing material nonpublic information regarding Altair, and no Insider may buy or sell securities of a Business Partner while possessing material nonpublic information regarding such Business Partner. If you are in doubt as to whether you possess material nonpublic information regarding Altair or a Business Partner, you should consult the Chief Financial Officer, Chief Executive Officer or in-house general counsel.
2. Without limiting the prohibitions in Section 1 above or the requirements of Section 3, except as provided in Section 8, no Insider may buy or sell securities of Altair or a Principal Business Partner outside of a "window period" described below (other than pursuant to a plan that complies with Rule 10b5-1 Plan that was established during a window period and approved in accordance with Section 3). A window period will open when the Chief Financial Officer sends an email or other written correspondence indicating that the window period is open. A window period will close when the Chief Financial Officer sends an email or other written correspondence indicating that the window period is closed. In general, window periods will open on the third business day after the date of each public release of annual or quarterly financial results and will close the earlier of (i) the close of business on the 30th day of the last month of the calendar quarter (i.e. March 30, June 30, September 30 and December 30), or (ii) with respect to an individual Insider, the receipt of key financial information for the quarter by that Insider. If the 30th day is not a business day, the trading window will generally remain open until the close of business on the first following business day. The Chief Executive Officer or the Chief Financial Officer may delay opening of a window period indefinitely beyond the regularly

scheduled opening date or close a window period at any time if, in his judgment, trading by Insiders would be inappropriate. No trading is allowed if the window period is closed.

3. Even if a trading window is open, an Insider may not effect any transactions in securities of Altair (other than with Altair) or a Principal Business Partner unless the Insider has completed and signed an Insider Trading Compliance Checklist in the form provided by Altair and had such checklist signed by the Chief Executive Officer, the Chief Financial Officer or the in-house legal counsel regarding such transaction. The Chief Executive Officer, the Chief Financial Officer or the in-house legal counsel may prohibit any such transaction but will not unreasonably withhold approval. The establishment of any trading plan designed to comply with Rule 10b5-1 must also be approved by the Chief Executive Officer, Chief Financial Officer or in house legal counsel as provided in Section 8(c).
4. Certain speculative trading practices are absolutely prohibited, both inside and outside of window periods. These practices include short selling of Altair common shares (i.e., selling shares not owned) and trading in put options and call options.
5. This policy also applies to family members of an Insider who share the Insider's household and to Individual Retirement Accounts (IRA's), trusts and other entities controlled by Insiders or by their family members. Insiders are responsible for compliance by members of their household and related entities to this policy.
6. This policy prohibits Insiders from passing material nonpublic information about Altair and its Business Partners to those who are not subject to this policy, including such persons as friends, brokers and business acquaintances. The passing along of information to those who may trade on that information is referred to as "tipping." Insiders guilty of "tipping" are subject to the same legal penalties and Altair sanctions as they would be had they traded on material nonpublic information themselves, even if they did not financially benefit from the trading activity.
7. All directors and "executive officers" (collectively, "Section 16 Individuals") must ensure that their transactions in Altair securities are in compliance with the requirements of Section 16 of the Securities Exchange Act of 1934 (the "Act"). All Section 16 Individuals should familiarize themselves with the trading restrictions and reporting requirements imposed by Section 16 of the Act. The following persons have been determined to be "executive officers" for this purpose:

Chief Executive Officer
President
Chief Financial Officer
Any Vice President

Section 16 requires each director and each executive officer, in general:

- (a) to file an initial report with the SEC about Altair common shares ownership and to report purchases or sales of Altair common shares, options or warrants within two business days after such purchase or sale. The Controller or outside counsel for Altair may assist with the filing of such reports; however, the respective Insider is ultimately responsible for ensuring that such reports are accurate and timely filed.

- (b) to avoid a purchase followed by a sale, or a sale followed by a purchase, of Altair common shares within a period of less than six months, and
 - (c) to avoid "short sales" of Altair common shares. Section 16 makes it unlawful for any Insider to sell Altair common shares if the seller does not then own the securities or if the seller fails to deliver the securities sold within twenty days after the sale or fails to mail the certificates for delivery within five days after a sale. The transactions against which this provision of Section 16 is chiefly directed are referred to as "short sales" and "short sales against the box." In a short sale, the seller attempts to profit from an anticipated drop in market price by selling securities the seller does not then own and covering the sale with securities bought after the decline. In a short sale against the box, the seller owns the securities in question, but does not deliver the securities within the prescribed period. The seller may later deliver the securities or purchase other securities to close the sale.
8. Exceptions to the policy are as follows:
- (a) Transactions with Altair, such as option exercises, are not subject to this policy. A sale in the market of shares acquired on exercise of an option is, however, subject to this policy and may occur only as permitted above.
 - (b) Bona fide gifts of Altair securities, such as contributions or charitable purposes, are not subject to this policy; however, if the beneficiaries of that gift are members of the household of the granting officer, director or employee or otherwise privy to material nonpublic information regarding Altair, subsequent transactions by the beneficiary are subject to this policy.
 - (c) Transactions executed pursuant to a binding, written contract, instruction or plan to purchase or sell securities that complies with Rule 10b5-1(c) of the Securities Exchange Act of 1934, as amended (a "Rule 10b5-1 Plan") are not subject to this policy, provided that all of the following apply:
 - i. the Rule 10b5-1 Plan was adopted during a window period and while the person adopting the Rule 10b5-1 Plan was not in possession of material non-public information;
 - ii. the Rule 10b5-1 Plan and all amendments, other than termination amendments, were approved by Altair's Chief Executive Officer, Chief Financial Officer or in-house legal counsel, with such approval not to be unreasonably withheld; and
 - iii. a correct and complete copy of the Rule 10b5-1 Plan, including all amendments thereto, has been provided to the Chief Financial Officer.
9. The Board of Directors or the Audit Committee of Altair may, in its discretion, authorize additional exceptions to any restrictions set forth in this policy, upon a determination by the Board of Directors or the Audit Committee, as applicable, that such exception would be consistent with the overarching

purpose of this policy to prohibit officers, directors and employees from trading in the public markets in securities of Altair or its Business Partners while in the possession of material, nonpublic information regarding the issuer of such securities.