ANTI-BRIBERY & ANTI-CORRUPTION POLICY

1. PURPOSE

In keeping with its commitment to conducting business transparently, honestly and with integrity, Bravo Mining Corp. and its subsidiaries (collectively, "**Bravo"** or "the **Company"**) has formalized its policy on compliance with applicable laws, including the *Corruption of Foreign Public Officials Act* (Canada) and the *Law 12.846/2013* (Brazil). The objective of the Anti-bribery and Anti-corruption Policy (the "**Policy**") is to provide a procedure to ensure that the Company, together with its directors, officers, employees, consultants and contractors, conduct its business in an honest and ethical manger reflecting the highest standards of integrity and in compliance with all relevant laws and regulations applicable to it.

2. APPLICATION

The Policy applies to all directors, officers, employees, consultants, contractors and any other person acting on behalf of the Company (collectively, "**Representatives**"). Additionally, the Policy notes that bribery, which is the most common form of corruption, can be broadly defined as the offering, promising, giving, accepting or soliciting of an advantage as an inducement or reward for an action which is illegal or a breach of trust. Bribery and corruption take many forms and the Policy outlines what is, and what is not, permitted in this regard.

3. RESPONSIBLE PARTY

The board of directors of the Company (the "**Board**") is ultimately responsible for this Policy and has delegated to the Audit & Risk Committee of the Board responsibility for ensuring this Policy complies with the Company's legal and ethical obligations and for overseeing the Chief Financial Officer on the administration of this Policy.

The Chief Financial Officer of the Company is primarily responsible for implementing this Policy and may establish a management Compliance Committee to provide assistance.

The Chief Financial Officer has responsibility for monitoring the use and effectiveness of this Policy and dealing with any queries on its interpretation. The members of the management team at all levels are responsible for ensuring those reporting to them are made aware of, and understand, this Policy and are given adequate and regular training on it. The Chief Financial Officer may delegate administrative tasks to subordinates or other employees or officers, as may be necessary for the purposes of implementing this Policy.

4. COMPLIANCE

All Representatives, in discharging their duties, shall comply with the laws, regulations and rules of the jurisdiction where they carry out their business duties to the Company and all jurisdictions where the Company conducts its business activities.

5. PREVENTION OF IMPROPER PAYMENTS

All Representatives will adhere to the Company's commitment to conduct its business in an honest and ethical manner reflecting the highest standards of integrity and in compliance with all relevant laws and regulations applicable to it. Accordingly, the Company and its Representatives shall not:

A. ***Bribes***

a) Directly or indirectly, offer, give or agree to give or offer a loan, reward, advantage or benefit of any kind to a public official, political party, party official or potential candidate, as consideration for an act or omission by the recipient in connection with the performance of the recipient's duties or functions with the government; or to induce the official to use his or her position to influence any acts or decisions of such government for the purpose of obtaining or retaining an advantage in the course of business, including an act or decision to direct business; or

b) Agree to, or comply with any demands for a bribe made by a public official, political party, party official or political candidate.

However, a director, officer, employee, consultant or contractor of the Company will not have breached the terms of this paragraph, if the loan, reward, advantage or benefit has been approved by the Board of Directors of the Company, and where such loan, reward, advantage or benefit is either:

i. Permitted or required under all applicable laws; and

ii. Made to pay the reasonable expenses incurred in good faith by or on behalf of the recipient that are directly related to the promotion, demonstration or explanation of the products or services of the Company, or the execution or performance of a contract between the Company and the government for which the recipient performs duties or functions.

B. Kickbacks

a) Kickbacks any portion of a contract payment to employees of another contracting party or utilize other techniquest, such as subcontracts, purchase orders or consulting agreements, to channel payment to public officials, to employees of another contracting party, their relatives or business associates.

C. Extortion

a) Directly or indirectly demand or accept a bribe.

D. Facilitation Payments

a) Make any facilitation payment, provided that, if the Chief Executive Officer of the Company deems necessary, then a facilitation payment may only be made in the following circumstances:

i. The payment falls strictly within the definition of facilitation payment under applicable laws;

ii. Is permitted by applicable laws;

iii. Due diligence has been conducted to ensure both the payment and its amounts are absolutely necessary to conduct the Company's business;

iv. The payment has been properly recorded in reasonable detail which accurately and fairly reflects the transaction and includes such information as the amount paid and the purpose of, and authorization for, such payments; and

v. Any such payment is reported on a quarterly basis to the Chair of the Audit Committee.

E. Political Contributions

a) Make any contributions to provide any financial support to policitcal parties or candidates on behalf of the Company without prior approval of the Board of Directors. However, if the Board of Directors provides its approval, a political contribution may be made only if:
    i. It is made in accordance with all applicable laws; and
    ii. All requirements for public disclosure of such contributions are fully complied with.

F. Appointment of Agents to deal with Government

a) Retain an agent to represent the Company's business interests in a particular country if such agent, or any of the agent's principals, staff, officers or key employees are government or public officials, political party officials, political candidates, persons related to the foregoing, or other persons who might assert illegal influence on the Company's behalf. However, if the Chief Executive Officer deems necessary, then such an agent may be retained provided:
    i. The reputation, background and past performance of the agent is properly researched and documented; and
    ii. The agent is retained pursuant to a written agreement specifically defining the agent's duties, representing and warranting the absence of the relationship set out above, providing for immediate termination in the event of an improper payment, annual certification requirement and the right to audit expenses and invoices.

G. Employment of Public Officials

a) Employ any officer or employee of a government or any of its agencies or a government corporation, or any person acting in an official capacity for any such entity including relatives or any such person. However, if the Chief Executive Officer deems necessary, then such a person may be employed provided:
    i. The employment if lawful in the country concerned;
    ii. The services to be rendered by the person do not conflict with the official government duties of the person; and
    iii. The services to be rendered by the person are such that the employment of the person does not conflict with any provision of this Policy.

H. Gifts and Entertainment

a) Give business gifts or take part in corporate entertainment or speaking engagements that are lavish and extraordinary. In cases where business gifts, corporate entertainment or speaking engagements are accepted, they must:
    a. Be in compliance with applicable laws;
    b. Be considered normal and accepted in the jurisdiction;
    c. Be of an appropriate type and value in the applicable jurisdiction and given at an appropriate time; and
    d. Be given openly and not in secret.
b) Gifts or entertainment offered to government officials or representatives, or politicians or political parties, have the prior approval of the Chief Executive Officer.

I. ***CHARITABLE CONTRIBUTIONS & SPONSORSHIPS***

a) Any charitable contributions or sponsorships made or offered on behalf of the Company must:
   i) Not be related to, dependent on, or made in order to win, a business deal or decision;
   ii) Be given directly to the relevant charity or organization and not to an individual; and
   iii) Only be given with the prior consent of the Chief Executive Officer.

The Company will conduct checks to ensure that the recipient of any charitable contribution or sponsorship is a legitimate charity, and that the donations or sponsorship were expensed or accounted for in an appropriate manner.

6. MANAGEMENT RESPONSIBILITIES

All Representatives must ensure that they have read, understood and comply with this Policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all Representatives. All Representatives are required to avoid any activity that might lead to, or suggest, a breach of this Policy. Representatives must notify the Chief Financial Officer or report the concern in accordance with the Company's Whistleblower Policy as soon as possible if there is belief or suspicion that a breach of this Policy has occurred, or may occur, in the future.

7. RECORD-KEEPING

The Company must keep financial records and have appropriate internal controls in place which will evidence the business reason for any payments made to Third Parties. Representatives must ensure that all expense claims relating to entertainment, gifts or expenses incurred are submitted in accordance with the Company's expense guidance.

All accounts, invoices, and other similar documents and records relating to dealings with Third Parties should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

8. REPORTING VIOLATIONS

All Representatives are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage with their immediate supervisor. If such Representative is not comfortable discussing the matter with their immediate supervisor, or does not believe that the supervisor has dealt with the matter properly, then they should report the concern in accordance with the Whistleblower Policy.

9. PROTECTION

The Company is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or as a result of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chief Financial Officer

immediately. If the matter is not remedied, and you are an employee, you should raise it formally with the Chief Executive Officer. Alternatively, concerns may also be raised through the Company's confidential ethics reporting processes outlined in its Code of Business Conduct and Ethics and its Whistleblower Policy.

10. CONSEQUENCES OF NON-COMPLIANCE WITH POLICY

Failure to comply with this Policy may result in severe consequences, which could include internal disciplinary action or termination of employment or consulting arrangements without notice. The violation of this Policy may also violate certain local laws and, if it appears that a Representative may have violated such laws, then the Company may refer the matter to the appropriate regulatory authorities, which could lead to penalties, fines or imprisonment. In addition, violation of this Policy may constitute a criminal offence under local laws and may expose the Company and/or a Representative to fines and/or imprisonment.

11. TRAINING AND COMMUNICATION

Training on this Policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this Policy. The Company's robust approach to bribery and corruption must be communicated to all consultants and contractors at the outset of the Company's business relationship with them and as appropriate thereafter. No consultants or contractors who will be dealing with government officials on behalf of the Company will be authorized to do so without first agreeing, in writing, to abide by all anti-bribery and anti-corruption laws and to abide by the requirements of this Policy.

12. REVIEW OF POLICY

The Chief Financial Officer will monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

The ESG Committee, in consultation with the Audit & Risk Committee, will review and, as necessary, amend this Policy on an annual basis to ensure that it is achieving its purpose, and will recommend its approval to the Board of Directors of the Company.

13. COMMUNICATION OF THE POLICY

To ensure that all Bravo Representatives are aware of the Policy, a copy will be made available on the Company's website at www.bravomining.com. New Bravo Representatives will be provided with a copy of this Policy upon joining or being retained by the Company and will be educated about its importance.

14. QUESTIONS

If you have any questions about how this Policy should be followed in a particular case, please contact the CFO of the Company.

15. APPROVAL

Owner Board of Directors	**Adopted** April 24, 2022
Policy Type Entity-level Policy	**Last Reviewed and Approved** August 2026