WHISTLEBLOWER POLICY

1. PURPOSE

The board of directors (the "**Board**") of Bravo Mining Corp. (**"Bravo"** or the **"Company"**) is responsible for ensuring that a confidential and anonymous process exists whereby all directors, officers, employees, consultants and contractors of Bravo (collectively, "**Bravo Representatives**") can report any complaints or expressions of concern regarding questionable behaviour, activities or business practices in without fear of any discrimination, retaliation or harassment. Accordingly, the Board has adopted this Whistleblower Policy ("**Policy**") which outlines the types of concerns that can and should be reported and the mechanism by which employees, directors, officers, consultants and stakeholders may report concerns that they may have with the Company and its activities.

2. APPLICATION

This Policy applies generally to all directors, officers, employees, consultants and contractors. It is also intended to provide a method for other stakeholders to voice their concerns regarding the Company's business conduct.

3. RESPONSIBILITIES OF THE AUDIT COMMITTEE REGARDING FINANCIAL CONCERNS

The Audit Committee, directly or through other committees of the Board or external legal counsel, shall investigate and act on complaints and expressions of concern regarding financial matters ("**Financial Concerns**") by Bravo Representatives regarding:

- Accounting, internal accounting controls and auditing matters, including those regarding the circumvention or attempted circumvention of internal accounting controls or that would otherwise constitute a violation of the Company's accounting policies;
- Compliance with Company policies and/or legal and regulatory requirements regarding financial reporting;
- Any matter which, in the view of the complainant, is illegal, unethical, contrary to the policies of the Company or in some other manner not right or proper; and
- Retaliation against any Bravo Representative who makes a Complaint.

Examples include but are not limited to:

- Questionable accounting, internal accounting controls or auditing practices or irregularities;
- Suspected violations of the law, whether civil or criminal, or any rule or regulation that relates to corporate financial reporting and disclosure;
- Risk to the Company's assets, property or resources; and
- Concerns about other business practices of the Company, including misleading or fraudulent financial disclosure.

4. RESPONSIBILITIES OF THE ENVIRONMENT, SOCIAL AND GOVERNANCE (ESG) COMMITTEE REGARDING NON-FINANCIAL CONCERNS

The ESG Committee, directly or through other committees of the Board or external legal counsel, shall investigate and act on complaints and expressions of non-financial Concerns ("**Non-Financial Concerns**") by Bravo Representatives regarding:

- Compliance with Company policies and/or legal and regulatory requirements regarding financial reporting
- Any matter which, in the view of the complainant, is illegal, unethical, contrary to the policies of the Company or in some other manner not right or proper; and
- Retaliation against any Bravo Representative who makes a Complaint.

Examples include but are not limited to:

- Danger to health, safety or security of a worker or the public or any breaches of occupational health and safety legislation;
- Suspected violations of the law, whether civil or criminal, or any rule or regulation that relates to corporate reporting and disclosure;
- Suspected violations of the Company's Code of Conduct or significant breaches of corporate policies;
- Bullying and/or harassment; and
- Bribery or corruption.

5. REPORTING ALLEGED VIOLATIONS AND COMPLAINTS

You are encouraged to report your concern to your immediate supervisor. Where a satisfactory response is not received, or if you are uncomfortable addressing your concerns to your supervisor, you may contact any executive officer. If you are unsure about the best course of action to take in a particular situation, you are encouraged to seek guidance in the same manner as making a report. Where a satisfactory response is not received, or if reporting in one of the ways noted above would create a conflict for you, we invite you to put your concerns in writing and forward them by email, mail, or hand delivery to:

The Company's Compliance Officer as follows:

Otavio Monteiro, Vice President ESG
In Strict Confidence
Av. Jorn. Ricardo Marinho, n. 360, room 111 Barra da Tijuca, Rio de Janeiro, Brazil, 22631-350
Email: otavio.monteiro@bravomining.com

You may also submit a concern to the Company's independent legal counsel, as follows:

Linneu de Albuquerque Mello
In Strict Confidence
Rua Araújo Porto Alegre 70, 1101, Centro, Rio de Janeiro, Brazil, 20030-015
Email: **linhadiretabravo@denunciasegura.com**

Alternatively, all incidents or concerns can be reported to the Independent Legal Counsel confidentially and anonymously through the Whistleblower channel:

By Phone : +55 21 3590 2780 or +55 21 3942 7292

The Company's Compliance Officer, or its independent legal counsel, as appropriate, will analyze and investigate the facts reported and if they are considered material, a formal report will be presented to the Audit Committee or the ESG Committee, as appropriate, and to the Board. If you would like to discuss any matter with the Board, you must indicate this in your submission and include a telephone number where you can be contacted if the Board deems it appropriate. In any report filed under this policy, you should provide as much specific information as possible including names, dates, places and events that took place, your perception of why the incident(s) may be a violation, and what action you recommend be taken.

It is important to note that any reports made under this Policy will be shared with the Chair of the Company's Audit Committee in respect of financial matters, and to the Chair of the ESG Committee in respect of non-financial matters.

Refer to Bravo's Code of Conduct for more information.

6. TREATMENT OF FINANCIAL CONCERNS

Financial Concerns will be reviewed as soon as possible by the Audit Committee with the assistance and direction of whomever the Audit Committee deems appropriate, including but not limited to external legal counsel. The Audit Committee shall implement such corrective measures and do such things in an expeditious manner as it deems necessary or desirable to address the Financial Concern. Where possible and when determined to be appropriate by the Audit Committee, notice of any corrective measures will be given to the person who submitted the Financial Concern.

We invite you to put your Financial Concerns in writing and forward it by email, mail or hand delivery to the Company's Compliance Officer:

Otavio Monteiro, Vice President ESG
In Strict Confidence
Avenida Jornalista Ricardo Marinho, 360, sala 247, Rio de Janeiro, Brazil, 22631-350
Email: otavio.monteiro@bravomining.com

You may also submit a Financial Concern to the Company's independent legal counsel, as follows:

Linneu de Albuquerque Mello
In Strict Confidence
Rua Araújo Porto Alegre 70, 1101, Centro, Rio de Janeiro, Brazil, 20030-015
Email: **linhadiretabravo@denunciasegura.com**

7. TREATMENT OF NON-FINANCIAL CONCERNS

Non-Financial Concerns will be reviewed as soon as possible by the ESG Committee with the assistance and direction of whomever the ESG Committee deems appropriate, including but not limited to external legal counsel. The ESG Committee shall implement such corrective measures and do such things in an expedious manner as it deems necessary or desirable to address the Non-Financial Concern. Where possible and when determined to be appropriate by the ESG Committee, notice of any corrective measures will be given to the person who submitted the Non-Financial Concern.

We invite you to put your Non-Financial Concerns in writing and forward it by email, mail or hand delivery to the Company's Compliance Officer:

Otavio Monteiro, Vice President ESG
In Strict Confidence
Avenida Jornalista Ricardo Marinho, 360, sala 247, Rio de Janeiro, Brazil, 22631-350
Email: otavio.monteiro@bravomining.com

You may also submit a concern to the Company's independent legal counsel, as follows:

Linneu de Albuquerque Mello
In Strict Confidence
Rua Araújo Porto Alegre 70, 1101, Centro, Rio de Janeiro, Brazil, 20030-015
Email: **linhadiretabravo@denunciasegura.com**

8. CONFIDENTIALITY AND ANONYMITY

The Company will respect the confidentiality of any complaint received under this Policy when requested, and anonymous written communications will be accepted. However, we encourage you to utilize the anonymous reporting medium only as a last resort because of the inherent difficulty of following up on anonymously reported violations. If you choose to remain anonymous and do not provide sufficient detail, we may not be able to instigate or make a comprehensive investigation of the claim.

9. INVESTIGATION OF COMPLAINTS

We assume that all reports under this Policy are made in good faith, are real, legitimate and significant enough to warrant an investigation. Upon receiving a Financial Concern, the Audit Committee will promptly conduct a thorough investigation. All Non-Financial Concerns will be promptly investigated by the ESG Committee of the Board. The Board of Directors will be notified of all such investigations.

The Audit and ESG Committees, as relevant, may delegate some or all of the investigation to members of senior management of the Company, as deemed appropriate and necessary. All information disclosed during the course of the investigation will remain confidential, except, subject to applicable law, as necessary to conduct the investigation and take any remedial action.

10. DUTY TO COOPERATE

You have a duty to cooperate in an investigation. If you fail to cooperate or provide false information in an investigation, the Company will take effective remedial action commensurate with the severity of the offense.

11. PREVENTION OF RETALIATION

You will be protected from retaliation, harassment, discharge, demotion, suspension or other types of discrimination, or threats thereof, including compensation or terms and conditions of employment, that are directly related to the disclosure of such reports if you:

- Disclose the information in good faith;
- Believe it to be substantially true;
- Do not act maliciously or make false allegations; and
- Do not seek any personal or financial gain.

You will also be protected in connection with any lawful act that you (i) take to provide information, or cause information to be provided, or otherwise assist in, any investigation regarding any conduct that you reasonably believe constitutes a violation of law or regulation, when the investigation is conducted by a federal, state or provincial regulatory or law enforcement agency, a member of Parliament or Congress, or a person with supervisory authority over you (or another person working for the Company who has the authority to investigate, discover, or terminate misconduct), or (ii) take to file, cause to be filed, testify, participate in, or otherwise assist in a proceeding filed or about to be filed (with knowledge of the Company) relating to an alleged violation of law or regulation.

If you believe you have been unfairly or unlawfully retaliated against in respect of a report made under this Policy, a complaint with your supervisor, or with any executive officer of the Company in instances where you are uncomfortable filing the complaint with your supervisor.

If you are uncomfortable filing the complaint with a supervisor or an executive officer of the Company, you may file a complaint with the Board Chair, the independent Lead Director, or the Company's Compliance Officer, as outlined above.

12. FALSE & MALICIOUS ALLEGATIONS

Bravo is proud of its reputation as a business with the highest standards of honesty. The Company will therefore ensure that substantial and adequate resources are put into investigating any concern which it receives. However, it is important to realize that the Company will regard the making of any deliberately false or malicious allegations as a serious offence. Such actions may result in disciplinary measures up to and including dismissal for cause or termination of contract, as applicable, and if warranted, legal action.

13. CONSEQUENCES OF NON-COMPLIANCE

Compliance with this Policy is a condition of your relationship with the Company. Policy violations may result in severe consequences, which could include civil and criminal penalties and internal disciplinary action up to and including dismissal for cause of termination of contract.

14. RETENTION OF RECORDS

The Audit Committee and the ESG Committee shall respectively retain all records relating to any Financial Concern or Non-Financial Concern, or report of a retaliatory act, and to the investigation of any such Financial Concern or Non-Financial Concern, for a period judged to be appropriate based upon the merits of the submission. The types of records to be retained by the Audit Committee and the ESG Committee shall include records of all steps taken in connection with the investigation and the results of any such investigation.

15. REVIEW OF POLICY

The Audit Committee and the ESG Committee will review, evaluate and submit this Policy to the Board for re-approval on an annual basis to ensure the Policy is effective.

16. 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. To ensure that all Bravo Representatives are aware of and have access to the Policy, a copy will be made available on the Company's website at www.bravomining.com.

17. QUESTIONS

Questions about this Policy should be directed to the Chair of the Audit Committee or the ESG Committee, or to the Corporate Secretary of the Company.

18. APPROVAL

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