

## **ABRASILVER RESOURCE CORP.**

### **WHISTLEBLOWER POLICY**

#### **INTRODUCTION**

1. As part of its commitment to the highest standards of corporate governance, AbraSilver Resource Corp. (collectively with its subsidiaries and affiliates, the “**Company**”) has established procedures for the receipt, retention and handling of complaints and concerns received relating to, among other things, alleged or suspected violations (the “**Whistleblowing Matters**”) of the Company’s internal policies and guidelines, accounting, internal accounting controls, auditing matters, or any applicable law or regulation. Every employee, officer, director, agent, representative or contractor of the Company (each, a “**Covered Person**”) has the responsibility to: (i) ask questions and seek guidance in respect of any Whistleblowing Matter; and (ii) promptly report any such Whistleblowing Matter in the manner set forth in this Whistleblower Policy of the Company (the “**Policy**”).
2. This Policy should be read in conjunction with the Company’s other related policy documents.

#### **WHEN TO REPORT A COMPLAINT**

3. Covered Persons should report a complaint if he or she believes that any Covered Persons may have engaged in, or is about to engage in, any conduct which may be:
  - (a) a violation of the Company’s internal policies;
  - (b) a violation of, or otherwise involve questionable practices in connection with, accounting, internal
  - (c) accounting controls or auditing matters;
  - (d) a violation of any applicable law or regulation;
  - (e) corruption, mismanagement or fraud; or
  - (f) a danger to worker health and safety, the environment or the public.
4. This list is not exhaustive, but it is intended to give an indication of the kind of conduct which might be considered “wrongdoing”. As such, if Covered Person is unsure about the matter but concerned about the possibility of a violation or questionable practice, he or she should nonetheless report the matter.

#### **PROCEDURES FOR THE SUBMISSION OF COMPLAINTS AND CONCERNS REGARDING ACCOUNTING, AUDITING AND OTHER MATTERS**

##### ***Reporting of Complaints***

5. Any Covered Person must submit any good faith complaints or concerns regarding questionable treatment or alleged violations with respect to Whistleblowing Matters.

6. A complaint may be submitted anonymously by mail or may be delivered confidentially, in person, by internal mail, regular mail or electronic mail to the Chair of the Audit Committee of the Company (the “**Audit Committee**”).
7. If the complaint is written and sent via mail, the individual reporting the complaint should mark the envelope as “confidential and private”. If the complainant wishes to discuss the matter orally, he or she should indicate this in the submission and include a telephone number at which he or she might be contacted.
8. To the extent possible, any complaint should be factual rather than speculative, and should contain as much specific information as possible to allow for proper assessment. The complaint describing an alleged violation or concern should be candid and set forth all of the information that the complainant knows regarding the allegation or concern. With respect to Whistleblowing Matters involving the possible violation of laws or regulations, Covered Persons may also choose to bring such concerns to an outside regulatory authority. However, the Company is committed to taking internal action in response to such concerns and would appreciate the opportunity to do so, if appropriate.

#### ***Treatment and Reporting of Complaints and Investigations***

9. Upon receipt of a complaint, the Chair of the Audit Committee shall make a determination, in their reasonable judgment, whether a reasonable basis exists for commencing an investigation into the complaint. To assist in making this determination, the Chair of the Audit Committee may conduct, or delegate authority to others to conduct, an initial, informal inquiry. To the extent possible, all complaints will be handled in a confidential manner; however, it should be noted that confidentiality could limit the investigator’s ability to conduct a complete inquiry.
10. The Chair of the Audit Committee shall report regularly to the Audit Committee about all complaints submitted to them since the last report, together with their determination of the complaint and the results, if any, of informal investigations.
11. The Audit Committee will then determine, in its reasonable judgment, whether a reasonable basis exists for commencing a formal investigation into the complaint or whether to forward the complaint to the Corporate Governance Committee (as defined herein) if the complaint does not relate to accounting and auditing controls and procedures, securities compliance and other matters pertaining to fraud against the Company. If the Audit Committee makes a determination that: (i) there is substantive merit to the complaint; and (ii) it will assume carriage of the complaint, then it shall instruct the Chair of the Audit Committee or an appropriate person to proceed with a formal investigation.
12. In the event the complaint is forwarded to the nominating and corporate governance committee (the “**Corporate Governance Committee**”) by the Audit Committee and the Corporate Governance Committee determines that: (i) there is substantive merit to the complaint; and (ii) it will assume carriage of the complaint, then it shall instruct the Chair of the Corporate Governance committee or another appropriate person to proceed with a formal investigation.
13. The Chair of the applicable committee (or another appropriate person) shall oversee all investigations under the authority of the Audit Committee or the Corporate Governance Committee, as the case may be. The Audit Committee, the Corporate Governance Committee or the Chair of the applicable committee, as the case may be, shall have the authority to retain outside legal or

accounting expertise in any investigation as he, she or it deems necessary to conduct the investigation in accordance with its charter and this Policy.

#### ***Corrective Action***

14. It is the responsibility of the Audit Committee or the Corporate Governance Committee, as the case may be, to report to management of the Company any non-compliance with legal and regulatory requirements and to ensure that management takes corrective action, including, where appropriate, reporting any violation to the applicable federal, provincial, state or regulatory authorities. Covered Persons that are found to have violated any laws, governmental regulations or policies of the Company will face appropriate, case specific disciplinary action, which may include demotion or discharge and other matters referred to in the Code.

#### ***No Retaliation***

15. The Company will not retaliate and will not allow any retaliation or discrimination by its employees, officers or directors of any kind against any complainant who submitted a good faith complaint. Specifically, the Company will not discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against any complainant submitting a good faith complaint.
16. In addition, neither the Company nor any of its employees, officers or directors may retaliate or discriminate against any Covered Person who lawfully provides information to the proper authorities regarding any conduct which the Covered Person reasonably believes constitutes a violation of federal, provincial or state securities or antifraud laws, or who participates in or otherwise assists with a proceeding relating to such potential violations by the Company or its employees, officers or directors.
17. However, groundless or unwarranted complaints, including those with vindictive intent, or for personal or financial gain are not acceptable. Appropriate disciplinary measures will be taken by the Company if allegations are initiated for malicious reasons or in bad faith.

#### ***Confidentiality and Anonymity***

18. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation (there may be unique circumstances when disclosing the complainant's identity may be required by law).

#### ***Retention of Complaints***

19. All complaints submitted by a Covered Person regarding an alleged violation or concern shall remain confidential unless consented to by the complainant. In addition, all written statements, along with the results of any investigations relating thereto, shall be retained by the Company for a minimum of seven years.
20. It is illegal and against the Company's policy to destroy any corporate audit records that may be subject or related to an investigation by the Company or any federal, provincial, state or regulatory body.

### ***Audit Committee Conflict***

21. In the event a complaint is about or deals with the actions or conduct of any member of the Audit Committee or a member of the Corporate Governance Committee, then, such complaint shall be directed to an independent director of the Company, as appointed by the board of directors of the Company. In the event that such complaint is also about or deals with the actions or conduct of such independent director then the complaint shall be directed to the chair of the board of directors of the Company.

### **REVIEW OF POLICY**

22. The Board of Directors of the Company will review and evaluate the Policy on an annual basis during the Company's third fiscal quarter to determine whether the Policy is ensuring the Company's effective receipt, retention and handling of Whistleblowing Matters.

Approval Date: September 23, 2025