

## INSIDER TRADING, DISCLOSURE & CONFIDENTIALITY POLICY

### 1. PURPOSE

The purpose of the Insider Trading, Disclosure and Confidentiality Policy (the “**Policy**”) of Bravo Mining Corp. and its subsidiaries (collectively, “**Bravo**” or the “**Company**”) is to prevent improper insider trading, to ensure that all parties in possession of undisclosed material information understand their obligations to preserve the confidentiality of such information, to prevent the selective disclosure of undisclosed material information, and to ensure that the preparation and release of documents by the Company or public oral statements made by a person with actual, implied or apparent authority to speak on behalf of the Company, that relate to the business and affairs of the Company, are protected against any misrepresentation. Strict adherence to this Policy will help the Company maintain credibility in the marketplace by ensuring that all investors in securities of the Company have equal access to information that may affect their investment decisions.

### 2. APPLICATION

This Policy relates to all of Bravo’s securities including common shares, stock options and any other securities issued by the Company from time to time, and applies to the directors, officers, employees, consultants and contractors of the Company (“**Bravo Representatives**”), and all “related persons” who may be in possession of material information. “**Material Information**” means any information relating to the business or affairs of the Company that would reasonably be expected to result in, a significant change in the market price or value of the Company’s securities or that would reasonably be expected to have a significant influence on any reasonable investor’s investment decisions. “**Material Non-Public Information**” means any Material Information relating to the business or affairs of the Company that has not yet been publicly disclosed. “**Related Persons**” include the spouse, minor child and anyone else living in the same household as a Bravo Representative, or other who do not live in the same household but whose transactions in the Company’s securities are directed by, or subject to the influence or control, of a Bravo Representative, including all legal entities controlled by the Bravo Representative, partnerships in which the Bravo Representative is a general partner, trusts of which the Bravo Representative is a trustee, and estate of which the Bravo Representative is an executor.

### 3. TRADING RESTRICTIONS

#### A. Insider Trading

Under applicable securities laws, Bravo Representatives are in a “special relationship” with the Company, and as a result, are prohibited from purchasing or selling shares or other securities of the Company while in possession of Material Non-Public Information. Information should be considered non-public until a reasonable amount of time has passed since the information has been disseminated widely to the general public through press release or other widely disseminated means, and reasonable time has passed for the public to analyze and digest the information. For the purposes of this Policy, 24 hours, or one clear trading days, shall be considered the minimum “reasonable time”.

No Bravo Representative shall, directly or indirectly, engage in any transaction involving the purchase or sale of the Company’s securities during any period commencing with the date that he or she possesses Material Non-Public Information and ending at the close of business two full trading days following public disclosure of that information. This includes buying or selling securities of the Company, and selling securities acquired through the exercise of stock options.

## B. Blackout Periods

All directors and officers (“**Insiders**”) and employees, consultants, contractors or others who possess Material Non-Public Information regarding the business or affairs of the Company from time to time (“**Designated Insiders**”) may be subject to regularly scheduled blackout periods during which trading in securities of the Company is prohibited.

## C. Ad Hoc Blackout Periods

Blackout periods may be imposed from time to time as a result of special circumstances material to the Company but not yet disclosed or disclosable. All Insiders and Designated Persons as determined from time to time will be covered by ad hoc blackouts and will be informed by means of email notification by one of the primary contacts listed in appendix a to this policy (the “**Primary Contacts**”).

## D. Pre-Clearance Requirements

To assist in preventing even the appearance of an improper trade, Insiders and Designated Persons must provide prior written notice of intention to carry out a trade (including the exercise of any stock option). No trade shall be carried out without the written consent of one of the Primary Contacts.

Notification of intention to trade must be provided in writing by email to [preclear@bravomining.com](mailto:preclear@bravomining.com). Approvals will be provided in writing by email. Clearance of a trade is valid for a period of seven (7) calendar days, unless revoked prior to that time. No trade may be carried out after the expiry of seven (7) days following the receipt of approval unless such approval is renewed.

Notwithstanding any notice of a trade as provided above and any approval of a trade provided by one of the Primary Contacts, the ultimate responsibility for complying with this Policy and applicable laws and regulations rests with the individual.

## E. Exceptions to Trading Restrictions

The prohibition regarding trading in securities of the company during a blackout period does not apply to the acquisition of securities through the exercise of stock options, but does apply to the sale of the securities acquired through the exercise of stock options.

Trading during blackout periods may be permitted in exceptional circumstances with the prior approval of the Chief Executive Officer (“**CEO**”) provided that the individual is not in possession of Material Non-Public Information. Exceptional circumstances may include the sale of securities in the case of severe financial hardship or where the timing of the sale is critical for tax planning purposes.

If a trading pre-clearance is granted under such circumstances, such persons are reminded of the general prohibition against insider trading under Canadian securities laws generally, and that compliance with those laws is the sole responsibility of the individual.

## F. Insider Reporting Requirements

A “Reporting Insider” as defined by section 1.1 of National Instrument 55-104, includes all directors and officers of the Company. Reporting Insiders are subject to reporting obligations in accordance with applicable securities laws, and are required to file an “insider trading report” with Canadian securities regulators within ten (10) calendar days after becoming a Reporting Insider, disclosing the individual’s beneficial ownership of, or control or direction over, Bravo securities and share-based awards.

Each such Reporting Insider is also required to file an insider trading report with Canadian securities regulators any time beneficial ownership of, or control or direction over securities of the Company, changes within five (5) calendar days of the date on which the change occurs.

Insiders who require assistance with the filing of an insider report may contact the Company’s Corporate Secretary who will arrange for the assistance, preparation and filing of an insider report.

Reporting Insiders are reminded that they are personally responsible for the timely disclosure of their trading activities, and any assistance offered to them in no way reduces the obligations imposed on them by applicable insider trading laws.

## G. Tipping

Tipping is the disclosure of Material Non-Public Information to any person (including Related Persons) where such information may be used by such persons to his or her benefit by trading in securities of companies to which the information relates, and is prohibited. Bravo Representatives who violate this Policy will be subject to disciplinary action, and may be liable for improper transactions by any person to whom they have provided Material Non-Public Information.

## H. Speculation and Hedging

In order to ensure that perceptions of insider trading do not arise, Bravo Representatives should not speculate in securities of the Company. For the purposes of this Policy, speculation involves the purchase or sale of securities of the Company with the intention of reselling or buying back in a relatively short period of time in the expectation of a rise or fall in the market price of such securities. Speculation for short-term profit is distinguished from purchasing and selling securities as part of a long-term investment program.

Bravo Representatives are prohibited from engaging in hedging transactions that could reduce or limit his or her economic risk with respect to the securities of the Company that they beneficially own, directly or indirectly, or exercise control or direction over, including trading in public-traded options, puts, calls or other derivative instruments related to the Company’s securities.

## 4. DISCLOSURE CONTROLS AND PROCEDURES

In this section, “**Document**” means any public written communication, including a communication prepared and transmitted in electronic form that is filed or required to be filed with any securities regulatory authority in Canada, or is filed or required to be filed with a government or an agency of a government under applicable law or with any stock exchange or similar institution under its bylaws, rules or regulations, the content of which would reasonably be expected to affect the market price or value of the securities of the Company.

“Documents” include but are not limited to:

- Press releases
- Corporate presentations
- Prospectuses
- Take-over bid circulars
- Issuer bid circulars
- Directors’ circulars
- Rights offering circulars
- Annual information forms
- Management’s discussion and analysis (“MD&A”)
- Annual financial statements
- Interim financial statements
- Material change reports
- Company Social media accounts
- Company website

### A. Authorized Spokespersons

For purposes of this Policy, and unless other persons are designated by the Company’s Board, the CEO, the Chief Financial Officer (“**CFO**”) and the EVP Corporate Development (“**EVP Corp Dev**”), have been designated as the Authorized Spokespersons. The names of these individuals shall be given to the market surveillance divisions of the TSX Venture Exchange (“**TSXV**”) as Company contacts. Generally, the Authorized Spokespersons or other individuals authorized by the CEO are the only individuals authorized to communicate with analysts, the news media and investors about information concerning our Company. Any of the Authorized Spokespersons may, from time to time, designate others to speak on behalf of the Company to respond to specific inquiries, as deemed appropriate and necessary. Unless designated by one of the Authorized Spokespersons, individuals must not respond under any circumstances to inquiries from the public, shareholders, the investment community, the media or others.

### B. Disclosure Committee

The Company has created a Disclosure Committee (the “**Committee**”) which will oversee the Company’s corporate disclosure practices, procedures and controls and ensure the implementation and adherence to this Policy. The Committee will be comprised of the CEO who shall be the Chair of the Committee, the President (“**President**”), the CFO, and the EVP Corp Dev, and any such other members as may be designated by the Chair of the Committee from time to time.

In addition to the above standing members, the President of the Company and the Vice President, Exploration of the Company are each a qualified persons (“QP”) as defined by National Instrument 43-101 – *Standards of Disclosure for Mineral Properties*, and as such will provide input to the Committee from time to time.

### C. Mandate of the Disclosure Committee

The Committee is responsible for:

- Evaluating and determining the necessity of making public disclosures;
- Ensuring the timely disclosure of material information in accordance with securities laws;
- Reviewing and approving each Document to ensure it is complete and accurate in all material respects;
- Oversight of the Document preparation process, including procedures for the preparation of drafts, circulation to appropriate Company personnel and external advisors where appropriate, the receipt of comments and the review of such comments by the Committee;
- Overseeing the Company’s disclosure controls, procedures and practices;
- Annually reviewing and evaluating the effectiveness of, and compliance with, this Policy and the Company’s overall system of disclosure controls, procedures and practices;

- Making determinations about whether:
  - A material change has occurred;
  - Selective disclosure has been or might be made; and
  - Whether a misstatement has been made.

#### D. Timely Disclosure of Material Information

The Company will publicly disclose Material Information concerning its business and affairs immediately upon it becoming apparent that the information is material except in restricted circumstances where immediate release of the information would be unduly detrimental to the interests of the Company, where immediate release of the information may compromise certain strategic business opportunities of the Company or where the information may not be disclosable due to third-party confidentiality restrictions or uncertainty of events (and where the Company complies with all applicable laws and regulations, including any confidential filing obligations and maintains confidentiality of the information).

The determination of when to not disclose Material Information immediately will be made by the Disclosure Committee who shall advise the Chair of the Environmental, Social & Governance Committee of such decision in order to assess when the appropriate confidential filings must be made.

#### E. Disclosure Principles

All public disclosure of Material Information pursuant to this Policy must be made in a way that ensures full disclosure is available to the public. The Company will adhere to the following basic disclosure procedures and principles:

- Press releases containing Material Information will be publicly disclosed in a timely manner through a major news wire service, and will be pre-cleared by the TSXV if issued during trading hours;
- If Material Information is to be announced at an analyst or shareholder meeting or a press conference, its announcement must be coordinated with a general public announcement by a press release.
- Disclosure will be complete in all material respects, and must include any information, the omission of which would make the rest of the disclosure misleading;
- Disclosure must be corrected in a timely manner if the Company is subsequently made aware that earlier disclosure by the Company contained a material error or omission at the time it was given;
- Unfavourable material information must be disclosed as promptly and completely as favourable information; and
- Previously undisclosed Material Information must not be disclosed to selected individuals; Disclosure on the Company's website alone does not constitute adequate disclosure of Material Information.

#### F. Approvals

Documents requiring approval must be provided to relevant parties sufficiently in advance of the time they are to be filed or released to allow time or review and comment on such Document. Any other Document must be approved by all members of the Disclosure Committee, the Board, and, where necessary, the Company's independent auditor.

In the case of interim financial statements, annual financial statements and interim and annual MD&As, following the approval of the Disclosure Committee, such Documents must be reviewed by the Audit Committee in accordance with the Audit Committee Charter prior to submission to the Board for approval.

#### G. Forward-Looking Information

**"Forward-Looking Information"** means all disclosure regarding possible events, conditions or results that is presented as either a forecast or a projection, including future-oriented financial information with respect to prospective results of operations, a prospective financial position or prospective changes in financial position that is based on assumptions about future economic conditions and courses of action.

In the event that a Document contains Forward-Looking Information, reasonable cautionary language identifying the Forward-Looking Information shall be provided notifying the audience that material factors could cause actual results to differ materially from expected results.

#### H. Avoiding Selective Disclosure

Authorized Spokespersons must only disclose information that is not Material Non-Public Information. When participating in shareholder meetings, industry conferences, analyst conferences, private meetings, or when otherwise communicating with the public, Authorized Spokespersons must only disclose information that is either not material or that has been previously disclosed. Any selective disclosure of Material Non-Public Information is not permitted.

#### I. Inadvertent Disclosure

If previously Undisclosed Material Information has been inadvertently disclosed to an analyst or any other person, the Company shall make immediate public disclosure of that information as soon as it is reasonably possible.

#### J. Contact with Analysts

The Authorized Spokespersons should avoid getting involved in the contents of an analyst's report, except to correct factual errors. Confirmation of or attempting to influence an analyst's opinions or conclusions may be considered to be disclosure by the Company. No comment is an acceptable answer to questions that cannot be answered without violating the rule against selective disclosure. To the extent practicable, more than one Disclosure Officer or persons specifically authorized by the Disclosure Officer should be present at each meeting with analysts or the media. After such a meeting, if the authorized spokesperson has any concerns regarding the information disclosed, he or she should discuss the matter with the CEO or legal counsel.

#### K. Notification of Market Surveillance

If required or if otherwise applicable in the circumstances, a member of the Disclosure Committee should supply copies of press releases to CIRO and the TSXV and should seek assistance and direction from CIRO as to whether an announcement should be released and whether trading in the securities should be halted for the dissemination of an announcement.

#### L. Disclosure Records

The Authorized Spokesperson, or his or her designate, will maintain a file containing all public information about the Company. This includes news releases, brokerage research reports, reports in the press and notes from meetings with analysts or shareholders.

#### M. Internet, Chat Rooms and Bulletin Boards

Bravo Representatives shall not participate in, host, link to, discuss or post any information relating to the Company in internet chat rooms, blogs, social networking sites, newsgroups or bulletin boards, including through social media channels such as Facebook, LinkedIn, Twitter and YouTube, except as expressly authorized by a member of the Disclosure Committee.

#### N. Company Website and Use of Social Media

The Company's website, and any other social media channels as may be used from time to time, shall be created and maintained by the EVP Corp Dev, who shall be the primary point of contact for communicating and approving content to be disseminated to the public through the website and social media channels. The EVP Corp Dev shall ensure that communication facilitated through social media, including the website, is consistent with this Policy and is in compliance with applicable securities laws (including with respect to the use of Forward-Looking Information). Information contained on the website will be regularly updated and maintained for accuracy. A list of all analysts known to the Company may be posted, but links to analysts' reports must not be posted or linked.

The Company's website shall include:

- All Material Information that has been previously disclosed;
- All press releases or links to those press releases;
- Investor relations contact information to facilitate communication with investors;
- A note that advises the reader that the information contained was accurate at the time of posting, but may be superseded by subsequent disclosures.

#### O. Rumours

The Company shall not comment, affirmatively or negatively, on rumours, including rumours on the internet. Authorized Spokespersons will respond consistently to rumours by stating that it is Bravo's policy not to comment on market rumour or speculation. If a securities regulatory authority or the TSXV requests that the Company make a statement in response to a market rumour, or when certain rumours are deemed to be harmful to the Company's interests, the Disclosure Committee may consider the matter and make a recommendation to the CEO as to the nature and content of any response.

### 5. CONFIDENTIALITY

Any Bravo Representative who is privy to Material Undisclosed Information is prohibited from communication such information to anyone else, unless he or she is required by law or it is necessary to do so in fulfilling his or her duties or in the necessary course of business.



#### A. Access to Confidential Information

Efforts will be made to limit access to confidential information only to those who need to know said information, and such persons will be advised that said information is to be kept confidential. Persons subject to this Policy must not discuss confidential information in situations where they may be overheard or participate in discussions regarding decisions by others about investments in the Company.

In certain circumstances, a code name may be assigned to confidential information. Persons subject to this Policy should utilize the code name at all times when discussing the confidential information. In order to prevent the misuse or inadvertent disclosure of Material Non-Public Information, documents and files containing confidential information shall be kept in a safe, secured location to which access is restricted. In addition, confidential matters should not be discussed in places where the discussion may be overheard, and transmission of documents containing Material Non-Public Information by electronic means will only be made where there is reason to believe that the transmission can be made and received under secure conditions.

#### B. Maintaining Confidentiality

In the event that confidential Material Information, or rumors respecting the same, is divulged in any manner (other than in the necessary course of business), consideration should be given as to whether immediate disclosure of the relevant Material Information must be made by the Company, and a trading halt may be instituted by the TSXV pending release and dissemination of the information. IIROC and the TSXV should be notified of the announcement in advance in the usual manner.

### 6. PENALTIES

Where the Company determines that this Policy has been violated and it is able to identify the individual person that breached this Policy, the Company will take its own disciplinary actions, which could result in termination of employment or engagement or implementation of a probationary period. The Company is also entitled to pursue its legal remedies through the courts. If appropriate, the Company will report the matter to the regulatory authorities.

Individuals may be subject to civil and criminal penalties and liabilities for engaging in insider trading, tipping, or failing to file insider reports where required on a timely basis. Consequences can be severe and can include fines and criminal sanctions.

### 7. POLICY REVIEW

The ESG 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.

### 8. 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](http://www.bravomining.com).



## 9. QUESTIONS

Questions about this Policy should be directed to the Chief Financial Officer of the Corporate Secretary of the Company.

## 10. APPROVAL

### Owner

Board of Directors

### Policy Type

Entity-Level

### Adopted

April 24, 2022

### Last Reviewed and Approved

November 14, 2024