ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. INTRODUCTION

This Anti-Bribery and Anti-Corruption Policy ("**ABC Policy**") is to be read in conjunction with the Aris Mining Corporation (the "**Company**") Business Conduct and Ethics Policy (the "**Ethics Policy**").

References to the Company in the ABC Policy include all of its subsidiaries and any other entity controlled by the Company. The ABC Policy prescribes standards of professional and ethical conduct for all of the Company's directors, officers, and employees, as well as consultants and contractors of the Company and agents indirectly representing the Company (collectively, all to whom the ABC Policy applies are referred to throughout as the "**Representatives**").

2. PURPOSE

The Company is committed to responsible operations conducted in accordance with all applicable laws, and fostering a culture of honesty, integrity and accountability.

The Ethics Policy and the ABC Policy set out the principles and policies all Representatives are expected to know and follow. Please read the Ethics Policy and this ABC Policy carefully. All Representatives must follow the ABC Policy, adhere to applicable laws and regulations, and avoid dishonest or corrupt conduct.

The ABC Policy sets out the standards which all Representatives are expected to follow when acting on the Company's behalf. All Representatives should be provided with or directed to a copy of the ABC Policy upon joining the Company, and periodically thereafter. All Representatives who are contracting parties and consultants of the Company should be provided with the ABC Policy and expressly agree to abide by the terms of the ABC Policy.

Representatives are expected to seek guidance in any case where there is a question about compliance with either the letter or the spirit of the ABC Policy, the Ethics Policy or any applicable laws. The ABC Policy supplements, and does not supersede the specific policies and procedures that are covered in other Company policies, such as the Company's Ethics Policy.

3. PROHIBITED PAYMENTS TO PUBLIC OFFICIALS

Every Representative must comply with all applicable laws prohibiting improper payments to public officials.

As the Company is incorporated pursuant to the *Business Corporations Act* (British Columbia) the Company is subject to the *Canadian Corruption of Foreign Public Officials Act* (the "CFPO Act"). The Company is also subject to the United States' Foreign Corrupt Practices Act (the "FCPA"). Anti-bribery and corruption statutes in other jurisdictions may also apply to the Company and its Representatives. The CFPO Act and FCPA make it an offence for the Company, in order to obtain or retain an advantage in the course of business, to directly or indirectly give, offer or agree to give, promise, provide or authorize the offer or giving of a loan, reward, advantage, contract or sub-contract award, benefit or anything of value of any kind to a public official, or to any person for the benefit of a public official:

- as consideration for or to induce an act or omission by the official in connection with the performance of the official's duties or functions;
- to influence any act or decision of the official in his official capacity;
- to induce the official to use their position to influence any acts or decisions of the foreign state or public international organization or entity for which the official performs duties or functions;
- to induce the official to perform a non-discretionary activity more quickly or at all; or
- to secure an advantage, benefit, contract or concession for the Company or any other party.

A public official includes:

- a person who holds a legislative, administrative or judicial position of a foreign state;
- an officer or employee of, or a person who performs public duties or functions for, a government, including a person employed by a board, commission, corporation or other body or authority that is established to perform a duty or function on behalf of a government (including partially government-owned or controlled entities), or is performing such a duty or function;
- an official or agent of a public international organization that is formed by two or more states or governments, or by two or more such public international organizations;
- a political party or party official; or
- a candidate for political office.

Prohibited conduct under the CFPO Act and FCPA includes making or offering to make a "facilitation payment" to influence a foreign public official to perform a non-discretionary

activity that they are legally required to do, but refuses to do or refuses to do in a timely manner, without a payment. The Company strictly prohibits Representatives from making such facilitation payments in all circumstances.

Anti-bribery and corruption statutes in other jurisdictions may also apply to the Company and its Representatives. Such legislation may have different standards than the CFPO Act or FCPA.

Violation of the ABC Policy may result in disciplinary actions up to and including dismissal from the Company as set out in Section 12.

4. COMMERCIAL BRIBERY

Extending a bribe to or receiving a bribe from a commercial party is also prohibited. No Representative shall directly or indirectly provide a bribe or other improper incentive to anyone, including someone who is not a public official, or receive a bribe or other improper incentive from anyone, in order to advance the Representative's or the Company's interests.

5. HIRING

The Company offers employment, including internships and contract positions, to candidates based on their merits, qualifications and experience. The Company does not promise, offer or provide employment of any kind for the purpose of maintaining or obtaining an improper advantage, including to public officials or their relatives.

6. POLITICAL ACTIVITIES AND CONTRIBUTIONS

The Company acknowledges and supports the right of its Representatives to participate in legitimate political activities. However, these activities should not be conducted on Company time or involve the use of any Company resources. Representatives will not be reimbursed for personal political contributions.

The Company may occasionally express views on local and national issues that affect its operations. In such cases, Company funds and resources may be used, but only as and when permitted by law and in accordance with Company policies and procedures. The Company may also make limited contributions to political parties or candidates in jurisdictions where it is legal and appropriate to do so. No Representative may make or commit to any political contributions on behalf of the Company without the approval of the Chief Executive Officer.

7. CHARITABLE DONATIONS AND SPONSORSHIPS

Charitable donations may also raise anti-corruption issues and implicate ABC laws, particularly where a donation or contribution is to a charity with which a public official is associated. Donations should only be made to registered and well-respected organizations and must not be used, or create the perception that they are being used, to obtain or maintain business or any improper advantage.

Sponsorships are contributions in money or in kind towards an event organized by a third party in return for the opportunity to advertise. For example, the Company may sponsor an event and advertise its brand by displaying its logo, receiving recognition in the event's promotional materials or in the speeches opening or closing the event, participating as a speaker in a discussion panel or purchasing tickets to the event. All sponsoring contributions must be transparent, pursuant to a written agreement, for legitimate business purposes, and commensurate with the consideration offered by the event host. Sponsorships must never be used, or create the perception that they are being used, to obtain or maintain business or any improper advantage.

8. GIFTS AND ENTERTAINMENT

Business gifts and entertainment are often exchanged between business partners as tokens of respect, appreciation and collaboration. Such gifts can include meals and beverages, tickets to sporting or cultural events, travel, accommodation and other merchandise or services. In some cultures, these gifts play an important role in business relationships. However, issues may arise when such gifts interfere with or have the appearance of interfering with objective business decisions.

Even if permitted under applicable laws, offering or receiving any gift, gratuity or entertainment that might, or might be perceived to unfairly influence a business relationship should be avoided. These guidelines apply even during traditional gift-giving seasons or events, such as birthdays, anniversaries or other celebrations.

Any gift offered or received by a Representative should be reasonable in both frequency and value given the circumstances. A gift that in the circumstances may reasonably be perceived as an attempt to create an obligation or enticement for the recipient is inappropriate.

Business entertainment activities should similarly be reasonable in frequency and value, and be provided without expectation of receipt of a direct or indirect advantage or benefit of any kind, business or personal.

If any Representative is having difficulty determining whether a specific gift or entertainment item for a non-public official lies within the bounds of acceptable business practice, seek guidance from the Company's General Counsel. Because of the strict rules relating to offering benefits to public officials, Representatives should never offer, promise or provide any gift, entertainment or other benefit without first consulting the Company's General Counsel.

9. TRAINING

The Company will conduct anti-bribery and anti-corruption training on a periodic basis and may also conduct training more frequently when there are changes to the applicable laws or when deemed that such interim training is necessary.

10. KNOWLEDGE AND REPORTING OF ANY ILLEGAL OR UNETHICAL BEHAVIOUR

The Company is committed to conducting its business in a lawful and ethical manner. Consequently, Representatives are expected to report all known or suspected violations of laws, rules, regulations, or the Ethics Policy or the ABC Policy. To facilitate reporting of illegal or unethical behaviour, the Company has a Whistleblower Policy that contains whistleblower procedures by which such behaviour can be reported. A copy of this policy is available on the Company's website at www.aris-mining.com or may be obtained from the Company's General Counsel. Persons wishing to make complaints or report concerns on a confidential basis are encouraged to make a complaint through the Company's online whistleblower platform, available at integritycounts.ca/org/arismining or by phone at 1-866-921-6714.

The Company prohibits retaliatory action against any Representative who, in good faith, reports a possible violation, or participates in the investigation of any such complaint.

It is unacceptable for any Representative to file a false report.

Nothing in this Policy prevents you from reporting potential violations of law to relevant government authorities.

The ABC Policy cannot, and is not intended to, address all of the situations Representatives may encounter. If in doubt as to the appropriate course of action, Representatives should contact their supervisor, manager, the Company's General Counsel, or the Chair of the Company's Audit Committee for guidance as appropriate in the circumstances.

11. RECORD KEEPING

All accounts, invoices, memoranda and other documents and records of the Company relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness.

Under the CFPO Act it is an offence for any person to:

- establish or maintain accounts which do not appear in any of the books and records that are required to be kept in accordance with applicable accounting and auditing standards;
- make transactions that are not recorded in those books and records or that are inadequately identified in them;
- record non-existent expenditures in those books and records;
- enter liabilities with incorrect identification of their object in those books and records;
- knowingly use false documents; or
- intentionally destroy accounting books and records earlier than permitted by law.

The FCPA similarly requires that the Company keep accurate and complete books and records and a system of internal accounting controls to ensure that transactions are properly authorized and recorded.

Representatives must comply with the Company's accounting policies and procedures and keep books, records and accounts that accurately reflect the Company's transactions and assets. All transactions must be documented accurately and completely in a timely manner.

No accounts or transactions may be kept "off-book" to facilitate or conceal improper payments. Recording of payments in a way which would conceal their true nature constitutes a violation of the ABC Policy and applicable laws.

Documents and records must be retained for the period prescribed by applicable law. Representatives must ensure that all expense reports relating to hospitality, gifts or expenses incurred with respect to third parties are submitted in accordance with the relevant Company policies and that the reasons for the expenditures are specifically recorded. In addition, all donations or contributions made by or on behalf of the Company must be submitted and recorded in accordance with the relevant Company policies.

12. VIOLATIONS OF THIS ABC POLICY

If any Representative fails to comply with this ABC Policy, such Representative may be subject to disciplinary action, including, where appropriate, immediate termination. In addition, where applicable, such Representatives may also be subject to individual civil or criminal legal penalties. In such cases, the Company reserves the right to withhold or deny indemnification or other responsibility for such individual penalties, and in addition may seek recovery from such person for any costs, damages and penalties incurred, borne, or imposed by or on the Company in accordance with applicable law.

The Company takes allegations of any potential breach of this ABC Policy and anti-corruption laws very seriously, and can initiate internal investigations, or support external investigations, into such allegations as appropriate. Representatives must fully cooperate with internal or external reviews and investigations.

This ABC Policy will be reviewed and updated whenever there is a change in law or regulation that affects its effectiveness in preventing the activities proscribed by this ABC Policy.

Approved by the Board of Directors on November 4, 2026.