

## **Eagle Plains Resources Ltd. Whistle Blower Protection Policy**

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This Whistleblower Protection Policy (the “Policy”) applies to all directors, officers and employees of Eagle Plains Resources Ltd. and its controlled subsidiaries (collectively the “Company”). The policy is also intended to provide a method for other stakeholders to voice any concerns regarding the Company’s business conduct.

The Company is committed to maintaining the highest standards of business conduct and ethics in its accounting standards and disclosures, internal accounting controls, and audit practices. It is the policy of the Company to comply with and require its directors, officers, and employees to comply with all applicable legal and regulatory requirements relating to corporate reporting and disclosure, accounting and auditing controls and procedures, securities compliance and other matters pertaining to fraud against shareholders. Every employee has the responsibility to assist the Company in meeting these requirements.

The Company’s internal controls, corporate reporting and disclosure procedures are intended to prevent, deter and remedy any violation of the applicable laws and regulations that relate to corporate reporting and disclosure, accounting and auditing controls and procedures, securities compliance and other matters pertaining to fraud against the shareholders. Even the best systems of control and procedures, however, cannot provide absolute safeguards against such violations. The Company has a responsibility to investigate and, if required, report to appropriate governmental authorities, any violations relating to corporate reporting and disclosure, accounting and auditing controls and procedures, securities compliance and other matters pertaining to fraud against shareholders, and the actions taken by the Company to remedy such violations.

It is the policy of the Company that all of its directors, officers, and employees including part-time and temporary employees report concerns about accounting and auditing matters that affect the Company. This memorandum establishes procedures for such reporting. The audit committee of the Board of Directors of the Company (the “Audit Committee”) has adopted these procedures in compliance with requirements that audit committees of listed companies establish procedures for: (i) the receipt, retention, and treatment of complaints received by the Company regarding accounting, internal accounting controls, or auditing matters (“Accounting Concerns”); and (ii) the confidential, anonymous submission by employees of the Company of concerns regarding questionable accounting or auditing matters.

These procedures promote the Company’s goal of creating an environment in which directors, officers, and employees openly communicate regarding Accounting Concerns and potential non-compliance with these procedures by an officer or employee of the Company (collectively, “Activities of Concern”).

Employees should feel confident to report violations as described above or to assist in investigations of such alleged violations. The **Company** will not tolerate retaliation or discrimination of any kind by or on behalf of the Company and its employees against any employee making a good faith complaint of, or assisting in the investigation of, any violation of government laws, rules, or regulations or the

**Company's** Code of Ethics (the "Code") or internal policies regarding accounting standards or disclosures, internal accounting controls, or matters related to the internal or external audit of the **Company's** financial statements.

#### Reporting Activities of Concern

The Company is firmly committed to compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. The fair and accurate reporting of all material financial and non-financial facts regarding the Company and its affairs is of paramount importance, and we will not tolerate fraud or misrepresentation of any kind.

#### *Reporting to the Vice President Exploration*

If an officer, employee or stakeholder reasonably believes that any employee of the Company or other person acting on behalf of the Company has violated any legal or regulatory requirements or internal policy (including those listed above), the employee or stakeholder should immediately report his or her concern. The Company encourages all officers and employees to report Activities of Concern either in person or via written correspondence to:

Jesse Campbell, Vice President Exploration & Director  
200, 44-12<sup>th</sup> Ave S  
Cranbrook, BC V1C 2R7

In the event that the officer, employee or stakeholder does not feel comfortable reporting an Activity of Concern to the VP Exploration, the officer, employee or stakeholder must inform the President. Officers and employees may submit reports of Activities of Concern anonymously. Correspondence may be sent to:

The President  
Eagle Plains Resources Ltd.  
#200, 44 – 12<sup>th</sup> Avenue South  
Cranbrook, B.C. V1C 2R7  
Attention: Mr. Chuck Downie

#### *Reporting to the Audit Committee*

In addition to, or in lieu of, reporting to the Vice President Exploration or the President, an officer, employee or stakeholder may report Activities of Concern to the Chair of the Audit Committee. Officers and employees may submit reports of Activities of Concern anonymously. Correspondence may be sent to:

Eagle Plains Resources Ltd.  
#200, 44 – 12<sup>th</sup> Avenue South  
Cranbrook, BC V1C 2R7  
Attention: Chair of Audit Committee

#### **Treatment and Handling of Reports of Activities of Concern**

Any person to whom an Activity of Concern is reported or who becomes aware of an Activity of Concern must, as soon as practicable and in any event within five

business days, contact the Vice President Exploration to provide details of the Activity of Concern. The Vice President Exploration will then investigate such Activity of Concern. All reports and investigations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. The Vice President Exploration will retain records relating to each Activity of Concern, the actions taken to investigate, and any response to such Activity of Concern for a period of two years.

The Vice President Exploration will then provide to the Audit Committee a summary of the reports of Activities of Concern he or she received during the prior quarter and the results of the investigations he or she made. If, at any time, the Vice President Exploration wishes to seek the immediate counsel of the Audit Committee with respect to an Activity of Concern, he or she may contact the Chair of the Audit Committee.

If the President or the Chair of the Audit Committee receives any reports of Activities of Concern, he or she must promptly inform the Vice President Exploration of the Activity of Concern, unless it would be, in his or her view, inappropriate in the circumstances to do so. The Vice President Exploration will then investigate the report of the Activity of Concern, make records relating to such Activity of Concern and report on such Activity of Concern as described above. In the alternative, the President or the Chair of the Audit Committee, as the case may be, will complete the investigation, record keeping and reporting in lieu of the Vice President Exploration, with respect to any Activity of Concern not reported to the Vice President Exploration.

The Audit Committee will review and take any action it deems appropriate in its judgment with respect to any Activity of Concern it is made aware of, including retention of any independent or expert advisors or meeting with officers of the Company. Any review and evaluation of an Activity of Concern will include consideration of whether the matter(s) described in the report of the Activity of Concern are improper and whether further review and/or investigation is warranted. Any decision by the Audit Committee to review or investigate any matter brought to its attention as a result of these procedures will not in any way be, or be deemed to be, a determination by the Audit Committee or the Company that any actions or inactions that are the subject of the report of the Activity of Concern have, in fact, occurred or are improper.

### **Available Assistance**

It is essential that all officers and employees understand these procedures. All officers and employees are encouraged to raise any questions about these procedures with the Vice President Exploration.

### **Exceptions to Procedures**

The Audit Committee must approve exceptions to these procedures.

### **Compliance With This Policy**

All employees, stakeholders or others must follow the procedures outlined in this Policy and cooperate with any investigation initiated pursuant to this Policy. Adhering to this Policy is a condition of employment. The Company must have the opportunity to investigate and remedy any alleged violation or employee concerns,

and each employee must ensure that the Company has an opportunity to undertake such an investigation.

This Policy does not constitute a contractual commitment of the Company. This Policy should not be construed as preventing, limiting, or delaying the Company from taking disciplinary action against any individual, up to and including termination, in circumstances (such as, but not limited to, those involving problems of performance, conduct, attitude, or demeanor) where the Company deems disciplinary action appropriate.

This Policy in no way alters an employee's at-will employment status with the Company. Either the Company or an employee can terminate the employment relationship at the Company at any time, for any reason or no reason, with or without cause, warning, or notice, subject at all times to the terms of any written employment agreement and applicable employment laws.

This Policy also confirms that the Company will not, directly or indirectly, discharge, demote, suspend, threaten, harass, retaliate against, or in any other manner discriminate against anyone by reason that such person:

- makes a good faith complaint to the Company or to an outside governmental authority, or to both, about suspected Company or employee violations of law or violations of the Company's policies or its Code or otherwise amounts to serious improper conduct;
- makes a good faith complaint to the Company or to an outside governmental authority, or to both, regarding accounting, internal accounting controls or auditing matters that may lead to incorrect or misrepresentations in financial reporting;
- provides information (or causes information to be provided) to or assists either the Company or an outside governmental authority in an investigation regarding violations of law or any of the Company's codes or policies; or
- files, testifies or participates in a governmental investigation or judicial or administrative proceeding relating to alleged violations of law.

This Policy does not supplant or otherwise affect existing rights that employees might have under other laws.

Annual review was conducted and any revisions to the Whistleblower Protection Policy were approved by the Board of Directors on June 15, 2023