

Anti-Corruption Policy

Effective Date: 12 Apr. 2023

Introduction:

Silveroc Mines Limited ("Silveroc," "we," "us," or "our") is committed to conducting business with the highest standards of integrity and transparency. This Anti-Corruption Policy outlines our stance against corruption and bribery and establishes guidelines for all employees, contractors, suppliers, and business partners to follow. We strictly adhere to the laws and regulations of both Canada and South America related to anti-corruption and anti-bribery.

Zero Tolerance for Corruption:

Silveroc has a zero-tolerance policy for any form of corruption, including bribery, extortion, kickbacks, or any other unethical practices. We prohibit all employees and representatives from engaging in corrupt practices in any business dealings, whether with government officials, private sector entities, or individuals.

Compliance with Laws:

We comply with the anti-corruption laws of Canada and South America, including but not limited to the Canadian Corruption of Foreign Public Officials Act and the South American anti-corruption regulations. Silveroc is committed to upholding the highest ethical standards and ensuring that our operations are conducted lawfully and transparently.

Prohibited Conduct:

- a. Bribery: Silveroc employees and representatives must not offer, promise, or give anything of value, including gifts, favors, entertainment, or payments, with the intent to improperly influence any business decision or obtain an unfair advantage.
- b. Extortion and Kickbacks: We strictly prohibit soliciting or accepting bribes, kickbacks, or other illicit payments from any party, including suppliers, contractors, customers, or government officials.
- c. Facilitation Payments: Silveroc does not tolerate facilitation payments or "grease payments" made to expedite routine administrative actions or secure services that entities are otherwise entitled to.
- d. Political Contributions: We respect the laws governing political contributions in each country where we operate. Political contributions must be made transparently, in accordance with applicable laws, and without the intent of gaining undue influence.

Gifts and Hospitality:

Silveroc acknowledges that customary and reasonable business gifts and hospitality can be an acceptable practice to build relationships. However, such gifts and hospitality must

be of nominal value, transparently recorded, and in full compliance with applicable laws and company policies. Employees must avoid any gifts or hospitality that may create a conflict of interest or appear to influence business decisions improperly.

Reporting Suspected Corruption:

If any employee or representative becomes aware of suspected corruption, bribery, or any unethical conduct, they must immediately report the matter to their supervisor, a senior manager, or the designated compliance officer. Silveroc encourages reporting through confidential channels to protect the identity of whistleblowers.

Consequences of Non-Compliance:

Failure to comply with this Anti-Corruption Policy may result in disciplinary action, up to and including termination of employment or contractual relationship. Additionally, individuals found to be involved in corrupt practices may face civil and criminal liabilities.

Training and Education:

Silveroc provides regular training and educational programs on anti-corruption policies and procedures to ensure that all employees and representatives understand their responsibilities and the consequences of non-compliance.

Review and Updates:

This Anti-Corruption Policy is subject to periodic review to ensure its effectiveness and alignment with changing laws and best practices. Updates will be communicated to all relevant parties.

Contact Information:

If you have any questions, concerns, or reports related to this Anti-Corruption Policy, please contact legal.dept@silverocmines.com

By abiding by this Anti-Corruption Policy, Silveroc reaffirms its commitment to conducting business with integrity and upholding the highest ethical standards.



Mr. Ralph Knight
Communications Director