



**IMPACT SILVER CORP**

## **WHISTLEBLOWER POLICY**

**October 1, 2025**

### **1. Purpose**

IMPACT Silver Corp. (the “Company”) is committed to maintaining the highest standards of integrity, transparency, and ethical conduct in all aspects of its business. This Whistleblower Policy (the “Policy”) provides a secure, confidential, and accessible process for directors, officers, employees, consultants, contractors, and third parties to report any suspected unethical, illegal, fraudulent, or improper activity without fear of retaliation.

This Policy supports the oversight responsibilities of the Audit Committee of the Board of Directors (the “Audit Committee”) and complements the Company’s Code of Business Conduct and Ethics.

### **2. Scope**

This Policy applies to all directors, officers, employees, contractors, consultants, and agents of the Company and its subsidiaries. It covers any report or concern regarding actual or suspected:

- Fraud, theft, or financial misrepresentation;
- Breach of internal accounting controls or auditing standards;
- Violation of securities, environmental, safety, or other applicable laws and regulations;
- Corruption, bribery, or conflict of interest;
- Harassment, discrimination, or workplace misconduct;
- Retaliation against anyone reporting a concern in good faith; or
- Any other unethical or improper behaviour that could adversely affect the Company, its employees, shareholders, or stakeholders.

### **3. Reporting a Concern**

Individuals may report a concern (a “Report”) in confidence and, if desired, anonymously through any of the following channels:

(a) **Confidential Email:** [jmeiklejohn@impactsilver.com](mailto:jmeiklejohn@impactsilver.com)

(b) **Mail** (confidential):

Chair, Audit Committee  
IMPACT Silver Corp.  
Suite 303 – 543 Granville Street  
Vancouver, BC V6C 1X8

Reports should include as much detail as possible to enable effective investigation (e.g., names, dates, description of events, supporting documents).

#### **4. Confidentiality and Anonymity**

All Reports will be treated as strictly confidential to the fullest extent possible, consistent with the need to conduct a fair and thorough investigation.

The Company encourages anonymous submissions, but providing contact information may help ensure proper follow-up and resolution.

The identity of any individual making a Report will not be disclosed unless required by law or necessary to conduct the investigation, and in such cases only to those directly involved in the process.

#### **5. Non-Retaliation**

The Company strictly prohibits retaliation, intimidation, harassment, or discrimination against anyone who, in good faith, reports a concern or participates in an investigation.

Any employee or representative found to have engaged in retaliatory conduct will be subject to disciplinary action, up to and including termination of employment or contract.

#### **6. Handling and Investigation of Reports**

- The Audit Committee (or its delegate) will review all Reports promptly and determine the appropriate course of action, which may include internal investigation, referral to management, or engagement of external advisors.
- Investigations will be conducted objectively, confidentially, and without bias.
- Where appropriate, the person who submitted the Report will be informed that the concern has been received and, if possible, advised when it has been resolved.
- All records relating to Reports, investigations, and outcomes will be retained securely for at least seven years or as required by law.

## **7. False or Malicious Reports**

Reports made in good faith are protected under this Policy, even if unsubstantiated. However, knowingly making a false or malicious allegation is a serious offence and may result in disciplinary action.

## **8. Privacy and Data Protection**

All personal information collected under this Policy will be handled in compliance with applicable privacy and data protection laws. Information will be used solely for the purpose of investigating and resolving the concern.

## **9. Communication and Awareness**

This Policy will be distributed to all directors, officers, and employees and made available on the Company's website. All new personnel will be informed of its purpose and procedures upon engagement with the Company.

## **10. Review and Oversight**

The Audit Committee will review this Policy at least annually to ensure its effectiveness and continued compliance with applicable laws and governance standards. Recommended amendments will be submitted to the Board of Directors for approval.

# IMPACT SILVER CORP. – WHISTLEBLOWER REPORT FORM

## Instructions:

Please provide as much detail as possible. You may submit this form confidentially via email (jmeiklejohn@impactsilver.com), mail, or secure online portal. You may remain anonymous, but including your contact information may help us follow up for additional information.

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## 1. Reporter Information (Optional)

- Name: \_\_\_\_\_
- Department/Title: \_\_\_\_\_
- Contact Email/Phone: \_\_\_\_\_

*(Leave blank if submitting anonymously)*

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## 2. Type of Concern (*Check all that apply*)

- ☐ Fraud, theft, or financial misrepresentation
  - ☐ Breach of accounting or internal controls
  - ☐ Violation of law, regulation, or securities rules
  - ☐ Corruption, bribery, or conflict of interest
  - ☐ Harassment, discrimination, or workplace misconduct
  - ☐ Retaliation against a whistleblower
  - ☐ Other unethical or improper conduct: \_\_\_\_\_
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## 3. Description of Concern

Please provide a detailed description of the incident(s), including:

- Names of persons involved
- Dates, times, and locations
- Any supporting documents or evidence

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#### 4. Witnesses (if any)

- Name(s) and contact information (if known): \_\_\_\_\_
- Relationship to incident: \_\_\_\_\_

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#### 5. Action Requested / Additional Comments

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#### 6. Submission

- **Email:** jmeiklejohn@impactsilver.com
- **Mail:** Chair, Audit Committee, IMPACT Silver Corp., Suite 303 – 543 Granville Street, Vancouver, BC V6C 1X8