

## WHISTLEBLOWER POLICY

### ***Objective And Scope***

Calibre Mining Corp. and its subsidiaries (collectively, the “**Company**”) is committed to maintaining a workplace in which the Company can receive, retain and address all complaints received by the Company regarding accounting, internal accounting controls or auditing matters (an “**Accounting Concern**”). To achieve this goal, the Board of Directors of the Company (the “**Board**”) has delegated to the Audit Committee of the Board (the “**Audit Committee**”) the responsibility for establishing a procedure for the confidential, anonymous submission by employees of the Company of concerns regarding any actual or potential violation of any aspect of required business conduct (“**business conduct**”). This Policy has been established to enable employees, officers and directors of the Company, as well as other stakeholders, to raise such concerns on a confidential basis, free from discrimination, retaliation or harassment, anonymously or otherwise.

For the purposes of the Policy, business conduct is intended to be broad and comprehensive and to include any matter, which in the view of the complainant, is illegal, unethical, contrary to the policies of the Company or in some other manner not right or proper. Examples would include:

- Violation of any applicable law, rule or regulation that relates to corporate reporting and disclosure;
- Violation of any corporate policies, including health, safety, environmental, operational, ethical or human rights;
- Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- Fraud or deliberate error in the recording and maintaining of financial records of the Company;
- Fraud or deliberate error in the reporting of drilling results, mineral production results, mineral grade or estimates;
- Deficiencies in, or noncompliance with, the Company’s internal policies and controls;
- Misrepresentation or a false statement by or to a director, officer or employee of the Company respecting a matter contained in the financial records, reports or audit reports of the Company;
- Deviation from full and fair reporting of the Company’s consolidated financial condition; and
- The deliberate concealment of any of the above matters.

### ***Method Of Reporting***

The Audit Committee is responsible for administering this Policy. A Compliance Officer has also been designated to assist in the administration of this Policy and to receive any submissions made under this Policy. Issues and Accounting Concerns may be reported to the Audit Committee Chair or to the Chief Financial Officer via email at [whistleblower@calibremining.com](mailto:whistleblower@calibremining.com).

An employee, director or officer, as well as other stakeholders, may also raise a concern anonymously through NAVEX Global, Inc, an independent, 24-hour Reporting Hotline service. Submissions made through NAVEX Global, Inc’s Reporting Hotline are protected by its secure technology system and Company management will not have access to any identifying message details.



An employee, director or officer, as well as other stakeholders, may submit concerns anonymously through the Reporting Hotline by any of the following methods:

**Online at:** [calibremining.ethicspoint.com](http://calibremining.ethicspoint.com)

Toll free by telephone at:

In Nicaragua (Spanish Prompts): 1-800-0164 then 844-977-0004 at the prompt In

Nicaragua (English Prompts): 1-800-0174 then 844-977-0004 at the prompt

In Canada and USA: 1-844-977-0004 then choose option 2 for an English Operator

Issues and concerns raised through the Reporting Hotline will be forwarded directly to the Compliance Officer and the Audit Committee Chair.

A person should report a concern as soon as he or she has a reasonable suspicion or concern. A person is not expected to investigate the matter personally before reporting it.

This Policy should not be used to report any personal grievance. Any complaints about a person's own personal circumstances (e.g., an employment dispute) should be pursued with his or her manager through the ordinary grievance channels.

### ***Confidentiality***

A director, officer or employee, as well as other stakeholders, reporting to the Reporting Hotline may choose to disclose his or her identity and is guaranteed confidentiality in the event of self-identification. However, if a complainant fails to identify himself or herself in his or her complaint and the information provided is insufficient, the Company may not be able to adequately investigate and resolve the complaint. A person who is concerned about possible reprisals if his or her identity is revealed should inform the Audit Committee Chair or the Chief Financial Officer, and appropriate measures may then be taken to preserve confidentiality.

The person making the report is required to maintain confidentiality of the report, and to not discuss the report or facts of the report unless required by law.

### ***Further Information***

Further information may be required depending on the nature of the issue and the clarity of the information provided. Allegations made anonymously should contain sufficient detail and information so that, if necessary, a meaningful investigation can be conducted.

### ***Non-Retaliation And No Adverse Consequences***

No director, officer or employee, or other stakeholder, who in good faith submits a report under this Policy shall suffer retaliation, harassment or an adverse employment consequence as result of such submission. Any act of retaliation should be reported immediately. An employee, officer or director, or other stakeholder, who retaliates against a person who has reported a violation in good faith is subject to discipline up to and including dismissal.



### ***Receiving And Investigating Reports***

If contact information is provided, the Compliance Officer will notify the sender of the complaint and acknowledge receipt of the reported or suspected violation within five business days. All reports will be investigated by the Company and corrective action will be initiated as required.

### ***Retention Of Reports***

The Audit Committee will retain as part of the records of the Audit Committee any complaints or concerns submitted under this Policy, tracking their receipt, investigation and resolution, for a period of at least three years.

Should you have any questions or wish additional information regarding this Whistleblower Policy please contact the Compliance Officer at:

[whistleblower@calibremining.com](mailto:whistleblower@calibremining.com)

### ***Review Of Policy***

The Audit Committee will review and evaluate this Policy on an annual basis to determine whether the Policy is effective in providing a confidential and anonymous procedure to report violations or complaints regarding Accounting Concerns.