

SUNSHINE SILVER MINING & REFINING COMPANY

ANTI-CORRUPTION POLICY

Sunshine Silver Mining & Refining Company is committed to a high standard of business conduct and integrity.

This Anti-Corruption Policy (this “Policy”) requires that Sunshine Silver Mining & Refining Company and each of its subsidiaries (collectively, the “Company”) comply with the requirements of the anti-corruption laws of the United States, Canada and other applicable laws of the countries in which the Company conducts business. Various anti-corruption laws address corruption in commercial dealings and in dealings with governmental entities. In addition, the countries in which the Company operates have laws making it illegal to improperly influence or attempt to improperly influence officials of foreign governments or to engage in certain related acts. In the United States, the law, as amended, is entitled *Foreign Corrupt Practices Act* (“*FCPA*”), and in Canada, the law is entitled *Corruption of Foreign Public Officials Act* (“*CFPOA*”).

This Policy should be read in conjunction with the Company’s Code of Business Conduct and Ethics (the “Code of Conduct”) and other management policies. This Policy is not intended to be an explanation of all the specific provisions of the anti-corruption laws or an exhaustive list of activities or practices that could affect the reputation and goodwill of the Company’s business. Rather, this Policy should be considered a minimum standard. To the extent this Policy requires a higher standard than required by applicable anti-corruption laws, rules or regulations, the Company requires adherence to these higher standards. In the case of any inconsistency between any of the Company’s other policies and this Policy, the provisions of this Policy will govern.

All questions concerning this Policy, interactions with government or quasi-government officials, or payment practices should be directed to the General Counsel or his or her designee (the “Compliance Officer”). The Compliance Officer is responsible for overseeing the Company’s compliance with this Policy and related procedures and applicable law. The Compliance Officer and his or her designee will also be responsible for:

- Ensuring that appropriate procedures are in place so that business agreements have the appropriate contractual clauses consistent with this Policy.
- Conducting reasonable inquiries to determine if any third parties that the Company does business with have adequate business practices designed to avoid improper influence of governmental officials.
- Confirming all required reports are completed and filed in a timely manner.
- Overseeing the coordination of the Company’s responses to regulatory agency inquiries or requests for information.
- Overseeing updates to this Policy in accordance with any changes in applicable law.

- Determining, in conjunction with the Company’s senior management and/or Board of Directors, as may be appropriate under the circumstances, a course of action in regard to any reports concerning a potential Policy violation.
- Monitoring the effectiveness of this Policy.
- Coordinating periodic internal audits of compliance with this Policy and required training of various stakeholders.

I. APPLICATION OF THIS POLICY

A. Persons to Whom this Policy Applies

This Policy applies to the Company and its subsidiaries; their employees, officers and directors; and their agents and representatives. This Policy also applies to Business Partners (defined below) of the Company. For these purposes, action by a foreign agent or representative is the equivalent of action by the Company.

B. Key Definitions

For purposes of this Policy, the following definitions apply:

“**Anything of Value**” means any item of tangible or intangible value, broadly defined, in any form, including but not limited to cash, cash equivalents (such as gift cards, gift certificates and merchandise discounts), loans, gifts, travel, lodging, entertainment, meals, expense reimbursements, per diems, favors, business or employment opportunities, compliance with a request to provide a thing of value to a third person, contributions to a charity or other non-profit organization and promotional sponsorships.

“**Business Partner(s)**” means third parties engaged by the Company or any entities owned or controlled by the Company that are expected to interact with Government Officials on behalf of the Company.

“**Facilitation Payments**” means payments made to secure or expedite the performance of routine, non-discretionary government action by clerical-level Government Officials.

“**Government Official**” includes (i) any public or elected official, officer, employee (regardless of rank), or person acting on behalf of a national, state, provincial, or local government, department, agency, instrumentality, state-owned or state-controlled company, public international organization, political party or entity that is financed in large measure through public appropriations, is widely perceived to be performing government functions, or has its key officers and directors appointed by a government and (ii) any political party, party official or candidate for political office or any person acting on behalf of such party official or candidate for political office. Examples include: issuers of government permits, approvals or licenses; airport authorities; state-owned factories or other businesses; customs; immigration or tax officials or ministers or representatives of foreign governments.

C. Prohibited Conduct

This Policy prohibits the Company and those persons identified above from offering, promising, paying, giving or authorizing the giving of Anything of Value directly or indirectly (through a third party) to any Government Official, or to anyone (whether or not a Government Official) to improperly influence a business or official decision and/or improperly obtain or retain business or any advantage. This prohibition applies to Facilitation Payments and includes giving Anything of Value to or engaging in any “quid pro quo” with any third party with the expectation or awareness of a high probability that the third party will, in turn, offer, promise or provide a benefit prohibited by this Policy, even if the benefit is undefined or anticipated in the future. The only exception is when an individual’s health, safety, or freedom is threatened unless the payment is made, in which case you must promptly report any payment to the Compliance Officer.

This Policy also prohibits possession of property or proceeds of property known to have been obtained as a result of the bribery of an individual or to launder (i.e., deal with intent to conceal) property or proceeds from property obtained as a result of corruption. Additionally, employees and Business Partners should not make or authorize payments or fees to third parties if the third parties are known or suspected to be acting as intermediaries for a Government Official, or if the payments/fees are excessive in relation to the services rendered.

D. Dealing with Suppliers, Customers, Independent Contractors, Consultants, and Other Non-Government Persons

Commercial bribery is illegal and unacceptable. This Policy prohibits the giving of Anything of Value as an inducement to improperly cause suppliers, customers, contractors, consultants, joint venture partners or others to enter into contracts or other commercial relationships or otherwise secure any improper advantage for the Company in commercial dealings. This Policy also prohibits any employees, officers, directors, agents, and representatives of the Company or its subsidiaries from improperly accepting Anything of Value as an inducement for the Company or its subsidiaries to enter into contracts or other commercial relationships or to give any party an improper advantage. Notwithstanding this Policy, unconditional gifts having nominal value, when made openly and as a social amenity, or as a token of esteem, regard or gratitude in accordance with local custom, and modest hospitality openly given or received in conformity with Section E below are permissible. Further exceptions may be permitted with the prior written approval of the Compliance Officer.

In addition, all representatives of the Company and its subsidiaries are expected to deal honestly and fairly with suppliers, customers, contractors, consultants, joint venture partners and anyone else in the course of business. This Policy prohibits manipulation, concealment, misappropriation or abuse of confidential information, falsification, misrepresentation of material facts, undue influence or unfair dealing practices, whether or not such practices are illegal.

E. Hospitality, Gifts - Government Officials and Charitable Giving

General requirements related to gifts and hospitality are found in the Code of Business Conduct and Ethics.

Prior approval in writing must be obtained from the Compliance Officer for the activities listed below:

- Offering or giving any gift, business entertainment (including meals, travel, lodging, entertainment, participation in recreational activities or events, and tickets, passes or other access to cultural or sporting events), or Anything of Value to a Government Official, regardless of the amount. With pre-approval, in most cases, meals may be provided to Government Officials to the extent that they could not be perceived as lavish or extravagant and are in line with ordinary business meals, and the Government Official is notified in advance that the hospitality will be offered. In addition, the Company may provide meals and housing to Government Officials stationed at or visiting a Company facility, provided that all such items are reasonable in the circumstances. No other meals or hospitality may be offered or provided at or outside of Company property to Government Officials without the prior written approval of the Compliance Officer.
- Offering or giving a gift of cash equivalents (such as gift cards, gift certificates, and merchandise discounts), discounts or rebates, regardless of the amount or recipient.
- Making political or charitable contributions, or engaging in political activities, other than on your own time, on your own behalf and from your personal funds as a private citizen.

A receipt or other written documentation justifying and documenting the provision of a gift, business entertainment or any other thing of value to a third party shall be submitted to the Compliance Officer promptly after such an expenditure is made. Anyone who does not seek pre-approval for a gift, business entertainment or any other thing of value may not be reimbursed and may be subject to disciplinary action as appropriate.

All approved travel expenses related to Government Officials should be paid directly to vendors (e.g., hotels, travel agencies, airlines). If direct payment is not possible, the government or agency involved with a particular travel expense may be reimbursed only upon the Government Official's presentation of receipts. In no case may payment or reimbursement be made directly to an individual Government Official.

II. DUE DILIGENCE REQUIREMENTS

To better protect against the business and legal risks of dealing with third parties who do not share the Company's commitment to fair dealing, the Company shall choose its Business Partners carefully. Prior to entering into an agreement with any Business Partners who will act on behalf of the Company, the Company shall perform appropriate due diligence and impose prudent safeguards against improper payments.

A. Red Flags

Certain types of activities and transactions, or “red flags”, should alert the Company and its employees to the potential for corruption, and should be considered during due diligence investigations of potential consultants or agents, Business Partners or acquisitions. The following is a list of some commonly encountered “red flags”:

- Operations in countries with high risk for bribery
- Operations with vendors in high-risk industries
- Requests for payments in cash
- Reimbursement requests for inadequately documented expenses
- Joint ventures with government-owned entities
- Payments to foreign consultants or agents that are large compared to local prevailing rates for such services
- Use of any unnecessary representatives and intermediaries
- Requests for payment in a country other than where the company’s operations are located or where the service provider is located
- Refusal to provide anti-corruption or other certifications or representations
- Unusual payment arrangements to vendors
- Commissions inconsistent with the going rate
- “Public red flags” such as historical evidence of political contributions, payoffs, bribes, kickbacks or excessive rebates

B. Pre-Hiring Due Diligence

Whenever the Company intends to engage or do business with a Business Partner that will have (or is reasonably expected to have) interactions with government entities or Government Officials, the prospective Business Partner shall be required to complete an Anticorruption Due Diligence Questionnaire for Business Partners which may be obtained from the Compliance Officer. The Company shall conduct a due diligence inquiry of the prospective Business Partner to determine its reputation, beneficial ownership, professional capability and experience, financial standing and credibility, and history of compliance with applicable provisions of the FCPA or similar applicable laws in other countries. The information to be obtained in connection with this due diligence shall be specified, and the results of such investigation shall be reviewed and approved, by the Compliance Officer. Key information concerning prospective Business Partners shall be recorded in written form that must be certified as correct by the relevant prospective Business Partner and such prospective Business Partner’s direct contact at

the Company. Additional due diligence may be required depending on the prospective Business Partner's risk profile results. Files supporting the Company's due diligence shall be maintained by the Compliance Officer and updated from time to time as necessary to manage the Company's compliance.

C. Agreements with Business Partners

All agreements involving Business Partners who will have (or are reasonably expected to have) interactions with government entities or Government Officials will contain a provision in substantially the following form, in addition to other terms as may be deemed to be necessary from time to time:

“Neither party, nor any of its respective subsidiaries or affiliates, directors, officers, employees, agents or subcontractors, shall make any payment or give anything of value, directly or indirectly, to any government official (including any director, employee or agent of any government department, agency or instrumentality) to influence any of his, her or its decisions, for the purpose of improperly obtaining or retaining business or to gain any other advantage, or for any other improper purpose”.

Such agreements must be accompanied by additional anti-corruption representations, warranties, and/or covenants and Anti-Corruption Certifications which are available from the Compliance Officer. Certain agreements may also require Business Partners to receive training on this Policy and compliance with anti-corruption laws or to certify compliance with anti-corruption laws by signing and providing to the Company an Anti-Corruption Certification, as directed by the Compliance Officer.

D. Post-Hiring Monitoring

Once the Company engages a Business Partner, employees interacting with that Business Partner have a responsibility to continue monitoring ongoing activities for any “red flags” or concerns. Such monitoring shall include:

- Reviews of invoices to ensure they are sufficiently detailed to permit a verification that the invoice, invoiced services, amount, and terms of payment in accordance with the terms of the Company's agreement with the Business Partner.
- Periodic revalidation of the third party, in the form of updated due diligence, as well as a renewed Anti-Corruption Certification from the Business Partner, on a cycle to be determined by the Compliance Officer.
- Regular messaging to the Business Partner to reinforce the Company's anti-corruption compliance requirements.

If any employee knows or reasonably believes that a payment or promise of payment prohibited by the FCPA, CFPOA or this Policy has been made or may be made by an agent, distributor, consultant or other third-party intermediary for or on the Company's behalf, the employee shall immediately advise the Compliance Officer and, in the case of anticipated payments or promises of payment, shall use all reasonable efforts to prevent the payment or promise from occurring.

E. Transactional Due Diligence

In considering and executing acquisitions, investments, joint ventures, and other business combinations or transactions, the Company should ensure that there is appropriate due diligence of the potential target or partner concerning compliance with anti-corruption laws and that there are appropriate legal protections for the Company as to these issues in the transactional documents. Accordingly, the Compliance Officer should be consulted early in the transactional process regarding an appropriate due diligence work plan and appropriate representations, warranties, and covenants.

III. RECORDKEEPING AND ACCOUNTING REQUIREMENTS

This Policy requires that the Company keep its books, records and accounts in reasonable detail that accurately and fairly reflect the Company's assets and how the Company's money has been spent. A system of internal accounting controls must be maintained to provide reasonable assurances of adequate internal controls over the accounting and reporting activities of the Company at all levels.

The record-keeping and accounting provisions of applicable laws apply to all transactions, not just those that could be viewed as illegal payments. In addition, the accounting and recordkeeping provisions of applicable laws may apply to certain of the Company's investments and business relationships based on the degree of control the Company possesses with respect to an investment or relationship. For example, if the Company has a majority interest in a joint venture and controls a joint venture (such joint venture to be identified as such by the Chief Executive Officer, Chief Financial Officer and the General Counsel), that joint venture is required to comply with the accounting and recordkeeping requirements and other laws applicable to the Company. If the Company has a minority and non-controlling interest in a joint venture, the Company is required to make a good faith effort to request that the joint venture comply with applicable internal accounting controls and recordkeeping requirements.

Each Company director, officer and employee must be candid in discussing matters concerning the Company's recordkeeping policies or accounting procedures with the Company's management, internal auditors, outside auditors, outside counsel and directors.

IV. EMPLOYEE COOPERATION, TRAINING, AND CERTIFICATIONS

The Company's commitment to high standards of ethical business conduct depends on you — every one of us must do our part. To that end, the Company expects employees to adhere to this Policy and attend training where appropriate or required. Additionally, each year, employees will be required to provide a written or electronic certification (an "Anti-Corruption Certification") to the Compliance Officer regarding their knowledge of any violations of this Policy or awareness of any other information that could help the Company carry out this Policy.

V. PENALTIES, FINES, AND IMPRISONMENT

There are potentially severe consequences for failing to comply with applicable anti-corruption laws. For example, violations of the FCPA may constitute both civil and criminal offenses, and liability under the FCPA may be imposed for "willful blindness" — that is, the failure to follow

up on “red flags” as described above. Companies may face criminal penalties of up to \$2 million for each anti-bribery violation, up to \$25 million for each accounting violation, or, for either type of violation, a fine based on up to twice the gross gain sought or the loss avoided by the violation. Individuals face substantial fines and/or imprisonment for up to five years for anti-bribery violations and up to 20 years for recordkeeping violations. Note that these amounts are subject to periodic inflation adjustments by the U.S. government. These consequences may apply to individuals who reside outside the United States.

Similarly, the Company and its directors, officers and employees may also face significant civil penalties. Other remedies may include disgorgement of profits secured through improper payments, prejudgment interest, imposition of a corporate compliance monitor, termination of U.S. government licenses, and exclusion (debarment) from U.S. government programs and contracting.

A U.S. company can be liable for the conduct of its non-U.S. employees or agents, even if no money was transferred from the U.S. and no U.S. person participated in any way in the foreign bribery. Companies may not reimburse any individuals for FCPA penalties. Individuals may be subject to criminal liability under the FCPA regardless of whether the Company has been found guilty or prosecuted for a violation. **Any Company officer, director, employee, independent contractor or consultant who violates this Policy or the FCPA or any other anti-corruption law inside or outside the U.S. will be subject to disciplinary action, potentially including (i) immediate suspension or termination of employment (in the case of officers or employees), or (ii) termination of the relationship and recovery of any damages incurred by the Company as a result of such violation (in the case of independent contractors, consultants and similar representatives). The Company may also report such violations to the appropriate regulatory and law enforcement authorities.**

Note that the principles of the CFPOA are very similar to the FCPA, and the above considerations will similarly apply on an extra-territorial basis to all Canadian citizens or permanent residents.

VI. QUESTIONS AND INTERNAL REPORTING

In practice, applying the requirements and prohibitions in this Policy and the FCPA/CFPOA are often difficult. Every individual subject to this Policy whose duties relating to the Company are likely to lead to involvement in or exposure to any of the areas covered by this Policy and the FCPA/CFPOA is expected to become familiar and comply with this Policy to avoid inadvertent violations and to recognize potential issues in time for them to be appropriately addressed.

Effective implementation and administration of this Policy requires ongoing and consistent cooperation between the Company and its Business Partners. Accordingly, any questionable, unauthorized, or illegal activity which is, or is potentially, prohibited by this Policy (a “perceived violation”), must be immediately reported to the Compliance Officer.

Reports of perceived violations must be submitted to the Compliance Officer or by following the procedures set out in the Company’s Whistleblower Policy, under which reports may be made anonymously at NAVEX through website:

<https://secure.ethicspoint.com/domain/media/en/gui/81643/index.html> or hotline number: 844-965-3409. Once a report of a perceived violation is received, the Company is committed to investigating and taking proper action. The Company has a strict non-retaliation policy and if a complainant is not anonymous, or the identity of the complainant becomes non-anonymous inadvertently or otherwise, the Company will not discharge, demote, suspend, threaten, harass, or in any manner discriminate against the complainant where a report is made in good faith and such person has endeavored to act lawfully and in accordance with this Policy.

The Company considers willful violations of this Policy and applicable anti-corruption laws to be extremely serious, exposing the Company to penalties, fines and reputational loss. Accordingly, following an investigation, any verified violation may lead to disciplinary action, up to and including termination. A verified violation may also expose the individuals involved to fines, penalties and potentially, imprisonment, from relevant governmental authorities.

The Compliance Officer will maintain a log of all reports of violations, tracking their receipt, investigation, and resolution, and shall prepare a periodic summary report thereof for future review, as necessary.

If you have questions or problems concerning this Policy, interactions with Government Officials, or payment practices, contact the Compliance Officer.

Approved by the Board of Directors on May 10, 2026.

Effective as of May 10, 2026.