



## Whistleblower Policy

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### **I. Purpose**

We are committed to conducting our business with honesty and integrity, and to complying with our corporate governance policies, including our Code of Business Conduct and Ethics (the “**Code**”). Unfortunately, from time to time, it is possible that violations or deviations from these standards may occur. In such cases, Battery Mineral Resources Corp. has a responsibility to properly investigate and, where appropriate, report such violations or deviations and the actions that we have taken to address them.

This Whistleblower Policy (this “**Policy**”) sets out the procedures for reporting any violations, or potential or suspected violations, of the Code, any applicable laws, rules or regulations and any applicable accounting, auditing, and securities requirements.

### **II. Application**

This Policy applies to all of our directors, officers, employees and consultants. In this Policy, these individuals are referred to as “you” or “your,” and Battery Mineral Resources Corp. and our subsidiaries, affiliates and joint ventures, wherever located, are referred to as “BMR,” “we,” “our” or “us.”

### **III. Questions and Administration**

Our Compliance Officer is available to answer questions relating to and is responsible for the administration of this Policy. The Compliance Officer will be a member of the internal Legal Department designated as such by the Chief Executive Officer from time to time. If the Compliance Officer is not available, questions and issues related to the administration of this Policy should be directed to the Chair of the Audit & Risk Committee.

### **IV. Reporting Responsibility**

It is your responsibility to report any violation or potential or suspected violation of the Code, any applicable laws, rules or regulations or any applicable accounting, auditing, and securities requirements, in accordance with this Policy on a timely basis. The following are examples of reportable matters:

- Fraud or deliberate error or misstatement in the preparation, evaluation, review or audit of any of our financial statements;
- Fraud, destruction, defacement, concealment, misappropriation, or other questionable practices related to our property or assets, or the preparation or maintenance of our financial records;

- Misrepresentations or false statements to or by a director, officer, employee or accountant regarding a matter contained in our financial records, financial reports or audit reports;
- Deviations from full and fair reporting of our financial condition;
- Failure to comply with, or efforts to circumvent, our internal compliance policies, procedures or standards, or internal controls;
- Failure to comply with applicable laws, rules and regulations, including but not limited to laws prohibiting bribery, corruption, money laundering or financing of terrorism;
- Actions that endanger health, safety or are likely to cause physical harm or damage to any person or property, or have the potential to cause environmental damage;
- Violations of the Code or our other corporate governance policies;
- Allegations involving criminal conduct or potential criminal conduct; and
- Matters that could create a conflict of interest.

## V. Reporting Procedure

If you have a concern or complaint regarding a violation or potential or suspected violation, you may submit your report in either English or Spanish by the following means:

- By calling the following toll-free telephone number:

Chile: [to be provided]

North America: [to be provided]

- By email/letter mail/courier to the Chair of the Audit & Risk Committee addressed as follows:

Battery Mineral Resources Corp.

Suite 400 - 744 Hastings St W

Vancouver, BC

Canada V6C 1A5

Email: [whistleblower@bmrcorp.com](mailto:whistleblower@bmrcorp.com) (an automated reply will be sent to confirm receipt)

STRICTLY PRIVATE AND CONFIDENTIAL

Attention: Chair of the Audit & Risk Committee

You may submit any report on a confidential and anonymous basis. All reports should contain as much specific information as possible so that a reasonable investigation can be conducted. In any form of communication, a formal reply will be sent if requested.

## **VI. Confidentiality**

We will treat any report you make pursuant to this Policy as confidential to the fullest extent permitted by law. We will exercise particular care to keep your identity confidential until a formal investigation is launched. Thereafter, your identity may be kept confidential, if requested, unless such confidentiality is incompatible with a fair investigation or unless such disclosure is required by law. In such instances, you will be so informed in advance of being identified. It is important to note that while we will take all reasonable steps to maintain your anonymity, the source or nature of the report and steps taken to investigate it may, as a practical matter, make it difficult to maintain such anonymity.

## **VII. Handling of Reports**

Upon receipt of a report of a violation or potential or suspected violation, such report will be forwarded to the Compliance Officer. The Compliance Officer will then evaluate and determine whether a reasonable basis exists for commencing an investigation into the report and will promptly notify the Chair of the Audit & Risk Committee of the report. The Chair of the Audit & Risk Committee will oversee the investigation and treatment of any report involving our accounting, auditing, internal controls over financial reporting or disclosure controls or procedures, and the Compliance Officer will oversee the investigation of all other reports. The Compliance Officer or the Chair of the Audit & Risk Committee, as applicable, may engage outside legal, independent auditors or other persons, as appropriate, to assist with the investigation in accordance with this Policy.

Following such investigation, the report will be brought to the attention of the full Audit & Risk Committee at its next scheduled meeting. The Audit & Risk Committee will then determine, with the input of BMR's management, the appropriate corrective action to be taken, if any.

## **VIII. No Retaliation**

No individual who, in good faith, submits a report under this Policy will suffer harassment, retaliation or adverse employment consequences as a result of doing so. Any director, officer, employee or consultant of BMR who retaliates against someone who has made a report in good faith will be subject to discipline up to and including termination of their employment or consulting arrangement.

## **IX. Acting in Good Faith**

Any individual who reports a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove to have been made maliciously or in bad faith, or were knowingly false, will be viewed as a serious disciplinary offense. Any director, officer, employee or consultant of BMR who submits a report on such a basis will be subject to discipline, up to and including termination of their employment or consulting arrangement.

## **X. Retention of Records**

We will maintain a record of all concerns or complaints received and will track their receipt, investigation and resolution. These records will be retained for a period of time required by applicable laws, rules and regulations.

## **XI. Policy Review**

We will review from time to time this Policy to ensure that it is achieving its purpose. Based on the results of the review, this Policy may be revised accordingly.

## **XII. Communication**

To ensure our directors, officers, employees and consultants are aware of this Policy, a copy of this Policy will be distributed to our directors, officers, employees and consultants. All directors, officers, employees and consultants will be informed whenever significant changes are made. New directors, officers, employees and consultants will be provided with a copy of this Policy.

Reviewed and approved by the Board of Directors on this 7th day of December, 2022.