



**Perpetua  
Resources**

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## **Non-Discrimination Policy**

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Approved by the board on April 16, 2026

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### **Summary:**

This Policy sets forth the Corporation's commitment and approach to fostering, cultivating, and preserving a workforce to meet the needs of the modern mining industry. This includes a culture of non-discrimination and respect, where employees, Board members, Executive Officer and Senior Management of all backgrounds and personal experience are valued.

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## 1. DEFINITIONS

In this Policy the following terms will have the following meanings:

**"Committee"** means the Corporate Governance and Nominating Committee of the Perpetua Resources Corp. Board.

**"Corporation"** or **"Perpetua Resources"** means Perpetua Resources Corp. and its subsidiaries (except where the context of terms presented here demonstrate that the reference is solely to Perpetua Resources Corp. (e.g., references to the Board or its Directors)).

**"Board"** means the Corporation's board of directors.

**"Director"** means a member of the Corporation's Board.

**"Executive Officer"** includes: an individual who is (a) an executive chair or president, or (b) a chief executive officer, chief financial officer or chief operating officer.

**"Senior Management"** includes an individual who is (a) a vice-president or (b) a manager in charge of a corporate function.

**"Policy"** means this policy.

**"Protected traits"** include, but are not limited to, age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, race, sex, religion, sexual orientation, veteran status, and other characteristics otherwise protected under applicable law.

## 2. PURPOSE

Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities, and talent that our employees invest in and bring to their work represents a significant part of not only our culture, but our reputation and company's achievement as well.

We embrace and encourage our employees' and directors' differences in experience and perspectives and believe that these differences make our Corporation stronger and more agile.

This Policy sets forth the Corporation's commitment and approach to achieving and maintaining a workplace required for modern mining and dedication to equal employment opportunity and non-discrimination in all aspects of the Corporation.

## 3. POLICY STATEMENT

Perpetua Resources is committed to non-discrimination in all aspects of employment, including, but not limited to, our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of treating each other with respect and valuing difference, which includes the

following:

- Respectful communication and cooperation between all employees;
- Teamwork and employee participation, permitting the representation of all employee perspectives;
- Work/life balance through flexible work schedules to accommodate employees' varying needs; and,
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for all.

The Corporation focuses on the core functions of the job and the related skill-set required to be successful in positions when determining whether an individual is the best suited for an opportunity with the Corporation. This philosophy allows the company to better balance a variety of perspectives and experience to ensure the Corporation hires and maintains the most qualified candidates.

The Corporation believes that the nomination of Directors and the appointment of Executive Officers and Senior Management should be based on merit and remains committed to selecting the most qualified individuals to fulfill these roles. In evaluating the most qualified candidate, the Corporation will also consider the unique perspectives and experiences of each candidate to ensure employees in leadership positions are uniquely qualified to demonstrate excellent decision-making, strong business performance, continuous innovation and good governance.

#### **4. GUIDING PRINCIPLES AND RESPONSIBILITIES**

To support the Corporation's non-discrimination and respect-based objectives, the following initiatives are undertaken:

##### *Employees*

All employees of Perpetua Resources have a responsibility to treat others with dignity and respect at all times and comply with the tenets of non-discrimination in all aspects of employment. All employees are expected to exhibit conduct that reflects a collaborative and welcoming demeanor during work, at work functions on or off the work site, and at all other company-sponsored and participative events. All employees are also required to attend and complete annual non-discrimination training to enhance their knowledge to fulfill this responsibility.

Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action.

Employees who believe they have been subjected to any kind of discrimination should seek assistance from a supervisor or an HR representative.

##### *Board and Executive Officer Appointments*

The Board, with the assistance of the Committee or any other person who identifies or nominates Board members or Executive Officers for appointment, will, in the process of identifying and considering candidates for appointment/election to the Board or to Executive Officer positions:

- ensure the Board is comprised of Directors who possess knowledge, skills, competencies, viewpoints and relevant expertise to enable them to make active, informed and positive contributions to the management of the Corporation and the conduct of its business;
- review the Board skills and competencies assessments, developed and maintained to identify the skills and competencies required for the Board and to monitor how those requirements are currently satisfied, along with potential areas for growth and improvement;
- consider candidates who are highly qualified based on their experience, professional expertise, personal skills, qualities and values;
- take into account that qualified candidates for Directors may be found in a broad range of organizations, including privately held businesses, profit and not-for profit associations, academic institutions and other entities in addition to the traditional candidate pool of corporate directors; and
- engage, where appropriate, qualified independent executive search firms to conduct searches for candidates, to help present a pool of well-qualified candidates in relation to the Board and Executive Officer positions.

#### *Senior Management Appointments*

The Chief Executive Officer, with the assistance of the VP Human Resources, will, when identifying and considering the selection of candidates for appointment/promotion to Senior Management positions:

- consider candidates who are highly qualified based on their experience, professional expertise, personal skills, qualities and values;
- take into account that qualified candidates may be found in a broad range of organizations, including privately held businesses, profit and not-for profit associations, academic institutions and other entities in addition to the traditional candidate pool of corporate senior managers; and
- engage, where appropriate, qualified independent executive search firms to conduct searches for candidates, to present a pool of well-qualified candidates in relation to Senior Management positions.

The Corporation remains committed to equal employment opportunity and non-discrimination and will not consider any individual's protected traits in any employment decisions.

## **5. MONITORING AND REVIEW OF THIS POLICY**

On an annual basis, the Committee will:

- monitor the implementation of this Policy;

- assess the effectiveness of the nomination and appointment processes at achieving the Corporation's commitment to non-discrimination and to building and retaining a talented modern mining workforce as outlined in this Policy;
- review best practices with respect to selection of individuals to serve on boards, or as an Executive Officer and/or Senior Management positions; and
- review this Policy, including an assessment of its effectiveness, and recommend any changes thereto to the Board.