Social Media Policy

Approved by the board on November 12, 2024

Summary:

This Social Media Policy is designed to guide employees, officers, directors and contractors of Perpetua Resources in making responsible decisions when creating, posting or otherwise contributing to blogs, social networks or other social media. Social media is treated by regulators in the same way as press releases and other more formal disclosure methods. The policy is not meant to discourage social media use, but does provide a list of do's and don'ts when using social media that need to be followed and must be read in conjunction with the Perpetua Resources Code of Conduct and Ethical Values Policy as well as the Disclosure and Confidentiality Policy.

A. PURPOSE AND SCOPE OF THE POLICY

The purpose of this Policy is to set forth the rules and guidelines which govern the use of Social Media by all employees, officers, contractors and directors (the "Perpetua Resources") of Perpetua Resources Corp. ("Perpetua Resources" or the "Corporation"). Social Media is any tool or service that facilitates conversations over the internet.

The Corporation recognizes that members of the Perpetua Resources Team likely participate in social media and online communication in some fashion, and it is not the intention of this Policy to deter that communication, but rather to provide guidelines for Social Media use that will protect the Corporation, its employees, officers, contractors and directors and the Corporation's shareholders.

This Policy is designed to assist the Perpetua Resources Team in making responsible decisions when creating, posting or otherwise contributing to blogs, social networks or other social media. These guidelines must be followed when using sites such as Facebook, LinkedIn, Twitter, YouTube, Google+, Instagram, Pinterest, Wikipedia or when making comments on blogs or any form of digital media.

PLEASE NOTE: This Policy in no way applies to activity or content protected by the National Labor Relations Act, and employees are not prevented hereby from engaging in online concerted activity protected by law.

B. BASIC PRINCIPLES

These principles apply to professional use of social media on behalf of the Corporation as well as personal use.

- **Adhere to the Corporation's Code of Conduct and Ethics and Disclosure and Confidentiality Policies.** The policies can be found on the Corporation's website at https://www.investors.perpetuaresources.com/investors/policies.
- **Use common sense and good judgement.** Each member of the Perpetua Resources is responsible for his or her own actions and each member must know that information that is posted or published has the potential to remain in the public domain for an indefinite period of time. All posts regarding the Corporation, or any of its activities, should reflect official and publicly available Perpetua Resources policy. Anyone posting or commenting on Perpetua Resources activities or interest, on topics where the team member is not considered to be expert, should make clear reference to the fact that the poster is conveying a personal opinion, and not speaking as an expert or qualified person or on behalf of the Corporation. Posts, or responses that warrant an expert response, should be referred to the appropriate person who has the authority to address that specific matter on behalf of the Corporation. All Perpetua Resources members are required to report to a member of the Disclosure Committee any posts about the Corporation which they feel are in any way misleading, false or otherwise inappropriate. Bearing in mind the viral nature of social media, team members must

consider fully and carefully the content of any post, knowing it could make its way to the front pages of major news sites. Any posts that contain statements, photos, video or audio that could reasonably be seen as malicious, obscene, threatening or intimidating will be regarded as a violation of this Policy.

- **Maintain confidentiality of business and proprietary information.** With reference to the Corporation's Disclosure and Confidentiality Policy, it would be regarded as a clear violation of this Policy to discuss any Perpetua-related information on social media that is not already in the public domain. This includes, but is not limited to, drill results, photographs of unassayed drill cores, financial results and negotiations with stakeholders with respect to permitting or other matters, to name just a few. If a team member is uncertain as to whether something is confidential or not, that person should speak to a member of the Disclosure Committee prior to posting or commenting on anything.
- **Only post information that is known to be accurate and publicly disclosed.** If a Perpetua Resources member inadvertently posts information that is incorrect or in any way misleading, that person must correct it immediately and, at the same time, bring the matter to the attention of the Disclosure Committee.
- **Refer media, press and investor inquiries to an authorized spokesperson of the Corporation if an official Company response is needed.** Perpetua Resources employees must not speak on behalf of the Corporation with the media, press or analysts/shareholders, unless they are an authorized spokesperson for the Corporation. The Disclosure Officer or other specific persons authorized by the CEO are the only individuals authorized to communicate with analysts, the news media and investors about information concerning our Corporation. Please refer to the Corporation's Disclosure and Confidentiality Policy for further guidance on media, press and investor inquiries.
- **Look before you link.** Each team member bears full responsibility for the content of what they post online. It is therefore essential that, prior to posting or responding, the team member has read and understood the entire webpage or article to understand and ensure that their post is both accurate and factual. In posting a link, the team member assumes responsibility that the third party content on that link complies with this Policy.

C. SOCIAL MEDIA DOs and DON'Ts

The following outlines what all employees, officers and directors of the Company should adhere to when using social media on behalf of the Corporation as well as for personal use:

What You Should Do:

- **Disclose your Affiliation.** If you talk about work related matters that are within your area of job responsibility you must disclose your affiliation with the Corporation.

- **State That It's YOUR Opinion** when commenting on the business. Unless authorized to speak on behalf of the Corporation, you must state that the views expressed are your own.

- **Protect Yourself.** Be careful about what personal information you share online.

- **Act responsibly and ethically.** When participating in online communities, do not misrepresent yourself or the Corporation.

- **Honor Our Differences**. **Live the values**. The Corporation will not tolerate discrimination (including age, sex, race, color, creed, religion, ethnicity, sexual orientation, gender identity, national origin, citizenship, disability, or marital status or any other legally recognized protected basis under federal, state, or local laws, regulations or ordinances).

- **Networking.** You are expected to maintain the same level of integrity when representing yourself on professional social media platforms, specifically including, but not limited to, LinkedIn, just as you would in the workplace.

- **Comply with Perpetua Resources policies**. This includes the Corporation's Disclosure and Confidentiality Policy, and the Code of Conduct & Ethical Values Policy.

What You Should Never Disclose:

- **The Numbers.** Non-public financial, assay result or operational information cannot be disclosed. If it's not already public information, it is not your job to make it so.

- **Personal Information:** Never share personal information about other employees, officers or directors of the Corporation or any of the Corporation's contractors or service providers.

- **Legal Information.** Do not disclose anything to do with a legal issue, legal case, or attorneys without first checking with the Disclosure Committee.

- **Illegal Materials.** Do not disclose any content that is obscene, illegal, or otherwise does not enjoy First Amendment protection as per federal, state and local laws and regulations.

- **Anything that belongs to someone else.** Do not disclose any illegally obtained copyrighted material such as music, publications, images and video content. Respect all copyright, trademark and similar laws and use such protected information in accordance with applicable law.

- **Inappropriate Conduct.** Do not disclose any content that violates the Corporation's standards of conduct, including immoral, unethical, harmful or unlawful action(s) that adversely affect the Corporation or an employee, such as disrespectful, defamatory, threatening or discriminatory treatment, harassment and the use of abusive or profane language.

- **Confidential Information:** Do not publish, post, or release anything that is considered confidential.

Basically, if you find yourself wondering if it is ok for you to discuss something that you learned at work, don't discuss it. When in doubt, do not post.

D. VIOLATIONS

If a member of the Perpetua Resources team violates the guidelines provided in this Policy, the Corporation may require that person to correct, edit or remove a post or statement. In addition, violations of this Policy by employees can result in disciplinary action, including verbal warnings, written warnings, suspensions, or other disciplinary actions, up to and including termination of employment.

E. CORPORATION NON-LIABILITY

The Corporation shall not be liable, under any circumstances, for any errors, omissions, losses or damages claimed or incurred due to any of your online postings. The Corporation reserves the right to suspend, modify or withdraw this Policy, and you are responsible for regularly reviewing the terms of this Policy.

F. CHANGES TO THIS POLICY

This Policy will be reviewed on a regular basis, at least annually, by the Board of Directors of the Corporation (the "Board") to confirm that it complies with applicable law and is consistent with industry standards. Any changes to this Policy require approval of the General Counsel and must be adopted by the Board before they become effective.