



AURA MINERALS INC.

DONATIONS & SPONSORSHIPS POLICY

1. Introduction.

Corporate Social Responsibility. Aura Minerals Inc. (“**Aura**” or the "**Company**") is committed to creating lasting relationships that are built on mutual respect and trust with local communities around its operations’ sites. The Company focuses on supporting sustainable programs which could conceivably continue benefiting local communities beyond mine closure.

One of the ways to support local communities is through strategic partnerships with local governments, non-governmental entities, or individuals (“**Beneficiary**”). Through these partnerships, the Company contributes to the communities through the transfer of financial, intellectual, or material resources or services – formalized as donations or sponsorships (“**Contributions**”).

2. Guiding Principles.

(a) **Legitimate purpose.** Aura is committed to support projects that create an ecosystem of basic services, including education, health, housing, and infrastructure. All Company’s Contributions should be made exclusively to recipients that can be relied upon using the transferred goods in the legitimate manner intended by Aura.

(b) **Transparency.** Any Contribution should be carried out in open and transparent conditions, be based on fair and objective criteria, be accurately and completely documented, and be consistent with the principles of the Company’s Code of Conduct and Anti-Bribery and Anti-Corruption Policy.

3. Roles and Decision-Making.

Despite the undeniable importance of Contributions for the development of local communities, there is an inherent risk of misuse of the funds for political interest – which could constitute a violation of the applicable anti-bribery laws such as the US Foreign Corrupt Practices Act and the Brazilian Anti-Corruption Law.

All Contributions are therefore subject to a dual approval process that directly involves a Company’s Chief Executive Officer, or Chief Financial Officer, or BU Director of Operations (“**Senior Management**”) and a member of the Compliance department.

(a) **Senior Management.** The Company's Senior Management is responsible for assessing whether the intended Contribution is adequate to the strategy and budget established by the Company. Senior Management is also responsible for assessing the purpose of the donation and its alignment with Aura's principles.

All Contributions must be pre-approved in writing by at least one member of the Company's Senior Management.

(b) **Head of Compliance and BU Compliance Officers.** The members of the Compliance department are responsible for assessing the purpose of the Contribution and the profile of the Beneficiary. If the purpose or the beneficiary background is inappropriate, the member of the compliance department in question must not approve the Contribution and immediately inform the Head of Compliance.

All Contributions must be pre-approved in writing by at least one member of the Compliance department.

(c) **Ethics Committee.** The Ethics Committee ("EC") is responsible for approving any exceptions to this policy, including non-charitable donations and off-budget Contributions.

4. Donations and Sponsored Projects.

The Company only makes donations with a charitable purpose, in benefit of the communities in which the Business Units ("BU") operate or of specific individuals in situation of need (e.g., scholarships, healthcare). Any non-charitable donation must be pre-approved by the Ethics Committee.

Corporate sponsorships, on the other hand, may support non-charitable causes – such as sport teams, cultural events, or academic projects or institutions. Aura's Senior Management will periodically define the Company's strategy for donations and sponsorships.

(a) **Charitable Contributions.** For the purposes of this policy, a donation is a unilateral transfer of an asset (financial or not) or a service to a Beneficiary. Donations are made free of charge, without expecting benefits/considerations from the Beneficiary.

(b) **Sponsorships.** Sponsorships are a form of marketing in which the Company transfers an asset (financial or not) or a service to an entity or individual for the right to be associated with a project or program. Sponsorships are a form of advertisement for the Company's brand and should necessarily add commercial value to the business.

(c) **Political Contributions.** Contributions to or to the benefit of Government Officials, political parties, initiatives, or candidates running for political office are prohibited. Contributions that improperly benefit any recipient who can improperly influence or who has regulatory oversight over any of the Company's business are also forbidden.

Aura's Senior Management and their direct reports must promptly report to the Company's Head of Compliance or to any BU Compliance Officer all personal contributions made to a candidate or candidates for political office within 10 days after the end of each month in which a personal contribution was made.

5. Procedures.

When performing a Contribution of any kind, the Company should consider appropriate anti-corruption compliance procedures to ensure the asset or service transferred is used for the intended purpose. The following procedures constitute the minimum steps to be undertaken by the Company's personnel for completing each Contribution.

(a) **Request for Contributions.** All Contributions must be preceded by a written request sent by the potential Beneficiary. The request must include detailed information about at least (i) the purpose of the Contribution, (ii) the amount, service or asset requested, (iii) the potential Beneficiary, and (iv) the benefit the Contribution will generate.

(b) **Beneficiary's Due Diligence.** Risk-based due diligence should be done on any Beneficiary of a Company's Contribution. Beneficiary's due diligence should analyze at least (i) basic information on the Beneficiary's status, reputation, and past projects; (ii) any connections with Governments or public officials (including whether such an entity or individual requested the donation in question); and (iii) the relationship between the donation and the Company's current or potential business operations.

In addition to background information above, it is important to verify not only the legitimate purpose for the Contribution, but also information on any previous involvement or support by the Company to the same Beneficiary.

(c) **Approval.** All Contributions made by the Company must be pre-approved in writing by a member of the Company's Senior Management and by the Head of Compliance or by the BU Compliance Officer.

The approval of the Contribution should consider whether the request is (i) in accordance with the applicable law, this Donations & Sponsorships Policy, and the Company's principles and strategy; (ii) made by a reputable potential Beneficiary to whom the Company wishes to be connected to; and (iii) suitable to the Company or BU's budget.

(d) **Formalization.** All Contributions must be formalized by written agreements or with provisions specifying the use of funds, assets or service transferred by the Company. The agreement must provide (i) assurance that the Beneficiary will comply with all applicable laws; (ii) the Beneficiary will present evidence of the appropriate use of the Contribution; and (iii) auditing/monitoring rights for the Company to inspect the usage of the Contribution.

(e) **Transfer of Assets.** Contributions in cash payments of any kind are prohibited. Any monetary Contributions should be made by wire transfer or traceable instrument to verified accounts belonging to the Beneficiary (and not to an indicated third party). Receipts should be obtained for any Contribution made, especially when wire transfer receipts are not available.

(f) **Recording.** All accounting entries in the Company's books and records must be timely and accurately recorded and include reasonable detail to fairly reflect transactions. These accounting entries and the supporting documentation must be periodically reviewed to identify and correct discrepancies, errors, and omissions.

6. Recordkeeping.

It is the Company's policy to implement and maintain internal accounting controls based upon sound accounting principles. All transactions involving the Contributions must be recorded in accordance with generally accepted accounting principles or IFRS, as applicable.

Aura will retain records related to all Contributions for five years or for the minimum retention period required by the BU local law where the Contribution was made, whichever is higher. All related records are subject to internal or external audit.

7. Compliance.

Company personnel must be familiar with and perform their duties according to the requirements set out in this policy. Company personnel who violate this policy or its Code of Conduct will be subject to disciplinary action, up to and including dismissal. Third-party representatives who violate this policy may be subject to termination of all commercial relationships with the Company.

To ensure that Company personnel are thoroughly familiar with the provisions of this policy, the Company shall provide appropriate training and resources to Company personnel.

When in doubt about the appropriateness of any conduct, the Company requires that you seek additional guidance before taking any action that may subject the Company to potential anti-corruption laws liability.

8. Duty to Cooperate.

The Company may at times undertake a more detailed review of certain transactions. As part of these reviews, the Company requires all employees, agents, and third-party representatives to cooperate with the Company, outside legal counsel, outside auditors, or other similar parties. The Company views failure to cooperate in an internal review as a breach of your obligations to the Company and will deal with this failure severely in accordance with any local laws or regulations.

9. Questions About the Policy.

If you have any questions relating to this policy, please contact the Company's Head of Compliance or the BU Compliance Officer.

10. Reporting Policy Violations.

Any Company personnel who suspect that this policy may have been violated must immediately notify the Company. To report potential violations of this policy, immediately notify your Supervisor, the Company's Head of Compliance, the BU Compliance Officer or the Whistleblower Channel.

Any Company Personnel who, in good faith, reports suspected legal, ethical, or policy violations will not suffer any adverse consequence for doing so.

Effective Date: November 10, 2023