



CLAWBACK POLICY

The Board of Directors (the “**Board**”) of Pecoy Copper Corp. (the “**Corporation**”) may, in its sole discretion, to the full extent permitted by applicable laws and to the extent it determines it is in the Corporation’s best interest to do so, require reimbursement of all or a portion of any performance-based incentive compensation received by an executive officer or former executive officer (each an “**Executive**”, and collectively, the “**Executives**”) after the date this policy was adopted, if (each such event, a “**Recalculation Event**”):

- a) the amount of such compensation was calculated based on, or contingent on, achieving certain financial results that are subsequently restated;
- b) the Executive was involved in gross negligence, intentional misconduct or fraud that caused or partially caused such restatement; and
- c) the compensation payment received would have been lower had the financial results been properly reported.

If the Board determines that it is in the Corporation’s best interest to require a reimbursement of all or a portion of any performance-based incentive compensation received by an Executive pursuant to this policy, the Board shall determine the amount of the recovery. Upon the occurrence of a Recalculation Event, before the Board determines to seek recovery pursuant to this policy, the Board shall provide to the relevant Executive(s) written notice and the opportunity to be heard.

For the avoidance of doubt, this policy does not limit the Corporation's right to take other measures provided for under applicable laws with respect to its employees, including termination.

This policy was adopted by the Board of Directors on June 23, 2026.