



APEX MINING CO., INC.

POLICY

TITLE	RISK MANAGEMENT POLICY
EFFECTIVE DATE	Immediately

I. POLICY STATEMENT

It is the policy of Apex Mining Co., Inc, (the Company) to achieve best practice in the management of all risks that threaten to adversely impact its operations, employees, customers, assets, functions, business objectives, and members of the community where it operates.

In line with this, the Company shall endeavor to identify all risks and properly manage these risks, in order to ensure a safe workplace for the employees and protect its properties. This also includes identifying potential environmental threats and other hazards to operations based on world standards and best practices.

The Company shall set-up a sound risk management framework to effectively identify, analyze, monitor, assess and manage key business risks.

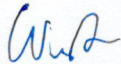
II. OBJECTIVES

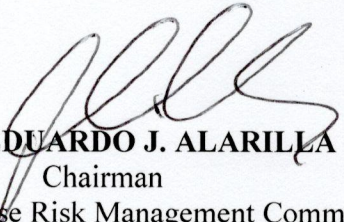
1. To provide a framework for the elimination and/or control of all risks associated with the business operations of the Company.
2. To ensure risk management is adopted throughout the Company and all levels of the organization.
3. To ensure that all employees are made aware of the need to manage risk and to promote a culture of participation in the process.
4. To protect the Company from adverse incidents, to reduce its exposure to loss and to mitigate and control loss should the risk occur.
5. To ensure that the Company shall be able to fulfill its mission, perform its key functions, meet its objectives, and serve its clients.
6. To reduce the costs of risk to both the Company and shareholders.
7. To protect the Company's image as a professional, responsible and ethical corporation.

III. SCOPE / ACCOUNTABILITY

1. The successful implementation of the Risk Management Policy requires a consistent and systematic approach to risk management at all levels of the organization.
2. Risk Management will form part of strategic, operational and line management responsibilities and will be integrated into the business planning processes.
3. There will be a Risk Management Team at the management level to determine and communicate policy, objectives, procedures and guidelines, and to direct and monitor implementation, practice and performance throughout the Company
4. The Board shall establish a separate Enterprise Risk Management (ERM) Committee, composed of at least three directors, to assist the Board in ensuring that there is an effective and integrated risk management process in place to arrive at a well informed decisions, taking into consideration the risk related to significant business activities, plans and opportunities.

FOR THE BOARD, BY:


WALTER W. BROWN
President & CEO


JOSE EDUARDO J. ALARILLA
Chairman
Enterprise Risk Management Committee

DATE SIGNED:

Oct. 23, 2017

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