



**TEAMWORK. INNOVATION. EXECUTION.**

WHISTLEBLOWER POLICY

Introduction

Nevada Copper Corp. and its subsidiaries (“the Company” or “Nevada Copper”) are committed to maintaining the highest ethical standards of conduct and to fully complying with all applicable laws and governmental regulations.

As part of its Corporate Governance practices the Company has adopted this Whistleblower Policy (the “Policy”) to set out the procedure and contact information for employees, directors, officers and others to report, directly or anonymously, any wrongdoings or suspected wrongdoings, including any unethical or illegal activity within the Company with out fear of reprisal.

Nevada Copper will not discharge, demote, suspend, threaten, harass or in any manner discriminate against an employee based upon the employee’s good faith reporting of potential misconduct.

This Policy applies to all employees, directors and officers of Nevada Copper. For the purposes of this Policy, the term “employees” includes all permanent, contract, secondment and temporary agency employees who are on long term assignments with Nevada Copper, as well as to consultants and contractors to Nevada Copper. This Policy is also intended to provide a method for other stakeholders (e.g. suppliers, customers, shareholders) to voice any concerns regarding Nevada Copper’s business conduct.

What is Wrongdoing?

Wrongdoing involves any unlawful or otherwise improper behaviour and can include:

Any unlawful act whether civil or criminal

Breach of or failure to implement or comply with any approved Nevada Copper Policy, including, but not limited to: Anit-Corruption, Insider Trading, Anit-Harrassment, Anti-Discrimination and Non-Retaliation and Code of Business Conduct and Ethics

Knowingly breaching federal, state, or local laws or regulations

Unprofessional conduct or conduct that is below recognized, established standards of practice

Failure to rectify or take reasonable steps to report a matter likely to give rise to a significant and avoidable cost or loss to Nevada Copper

Abuse of power or authority. Unlawful discrimination or harassment in the course of employment or provision of services

Dangerous practices likely to cause physical harm/damage to any person or property

Questionable accounting or auditing practices

#### Who is protected?

Any employee who makes a disclosure or reports a Wrongdoing under this Policy will be protected if the employee:

- ✓ Discloses the information in good faith
- ✓ Believes it to be substantially true
- ✓ Does not act maliciously or make knowingly false allegations
- ✓ Does not seek any personal or financial gain

#### How do I Report Wrongdoings?

If an officer, employee or stakeholder is aware of or suspects a Wrongdoing, that employee should immediately inform his or her supervisor, manager or department head or human resources. If the individual reporting the Wrongdoing does not have a supervisor, or where addressing the matter through a supervisor creates a conflict, they may submit their complaint to the Company's General Counsel. The General Counsel may be contacted by mail:

General Counsel  
Nevada Copper Corp.  
61 E. Pursel Lane  
Yerington, NV 89447  
(mark envelope as "Confidential")

Employees may also submit a report involving the General Counsel directly to the Chair of the Audit Committee by sending a report to:

Chair of the Audit Committee

Nevada Copper Corp.  
910-800 West Pender Street  
Vancouver, BC Canada V6C 2V6  
Phone: 604-683-8992

(mark envelope as “Confidential”)

Accounting and Similar Concerns:

Any concerns or questions regarding a potential Wrongdoing involving accounting, internal accounting controls or auditing matters should be directed to the Chair of the Audit Committee of Nevada Copper:

Chair of the Audit Committee  
Nevada Copper Corp.  
910-800 West Pender Street  
Vancouver, BC Canada V6C 2V6  
Phone: 604-683-8992

(Mark envelope as “Confidential”)

Anonymous Reports:

When reporting Wrongdoings, Nevada Copper prefers that officers and employees identify themselves to facilitate Nevada Copper’s ability to take appropriate steps to address the reported Wrongdoing, including conducting any appropriate investigation. However, Nevada Copper also recognizes that some people may feel more comfortable reporting a suspected Wrongdoing anonymously.

If an officer or employee wishes to remain anonymous, he or she may do so, and Nevada Copper will use reasonable efforts to protect the confidentiality of the reporting person subject to applicable laws, rules, or regulations or to any applicable legal proceedings. In the event the report is made anonymously, however, the reports should provide as much detail as is reasonably necessary to permit Nevada Copper to evaluate the matter(s) set forth in the anonymous report and, if appropriate, commence and conduct an appropriate investigation.

Confidential reports may be submitted by contacting, IntegrityCounts, our Company’s third-party anonymous hotline service, as follows:



Submit a report through the Company's  
Whistleblower Service, IntegrityCounts:  
Call Free Call: 1-866-921-6714  
Email: [nevadacopper@integritycounts.ca](mailto:nevadacopper@integritycounts.ca)  
Web:  
<https://integritycounts.ca/org/nevadacopper>

Your message will be provided to the Company contact.

### What do I Include in a Report?

Reports of concerns should be factual rather than speculative and should contain as much specific detail as possible to allow for proper assessment. To the extent possible the report should contain:

- ✓ A detailed description of the activity or issue
- ✓ The individuals involved
- ✓ Relevant time periods and locations
- ✓ Any immediate or urgent concerns
- ✓ Any additional information that is important and relevant to the report of potential misconduct.

The report should contain all the information the employee knows about the alleged violation or concern. The Company may, in its reasonable discretion, determine not to commence an investigation if a report does not contain enough factual support to support allegations of wrongdoing.

### What Happens After I Report?

Upon receipt of a report of potential misconduct the following procedure will be followed:

- ✓ The General Counsel will evaluate the report to assess the nature, scope and impact of the potential misconduct. If the General Counsel determines the report warrants further action the following steps will be taken.
- ✓ If the individual has identified himself or herself, the General Counsel will acknowledge receipt of the report to the individual.
- ✓ After review of the report, if sufficient factual support exists, the General Counsel will report the potential wrongdoing to the Chair of the Audit Committee who will oversee the treatment of the report.
- ✓ The Chair of the Audit Committee may assign initial responsibility for the matter to the General Counsel, the Company's internal auditing staff, other counsel, one of the other members of the Audit Committee or to such other person deemed appropriate by the Chair of the Audit Committee. The Audit Committee Chair or member may share the reported information with the Company's internal auditing staff, the Company's independent auditor or such other persons as the Audit Committee Chair or member determines to be appropriate, except as noted below with respect to confidentiality.
- ✓ Following such review or investigation, the complaint or concern will be brought to the attention of the full Audit Committee as soon as possible, which will then determine the appropriate corrective action to be taken, if any.

### Confidentiality of Reporting:

Confidentiality will be maintained to the maximum extent possible, to the extent that the Company can do so consistent with its obligations to investigate and remedy the matter and, if appropriate, to report the matter to government officials.

### Misuse of Reporting Channels:

Employees must not use these reporting channels in bad faith or in a false or frivolous manner.

### Retaliation Prohibited:

Any effort to retaliate against any person reporting a Wrongdoing in good faith is strictly prohibited and shall be reported immediately to the Chair of the Audit Committee. An employee who retaliates against a person who has reported a Violation in good faith is subject to discipline up to and including dismissal.

### Time Frames:

The Company will investigate reported Wrongdoings as soon as possible. Sometimes, Nevada Copper will need to refer reported Wrongdoings to outside agencies or organizations for investigation, which may result in an extension of the investigative process. Additionally, the seriousness and complexity of any reported Wrongdoing may have an impact on the time needed to investigate a matter.

### General:

Nothing in this Policy should be construed or interpreted as limiting, reducing or eliminating the obligation of any director, officer, or employee of Nevada Copper to comply with all applicable laws.

Conversely, nothing in this Policy should be construed or interpreted as expanding applicable standards of liability under federal, state, or local law for directors or officers of Nevada Copper.

*As amended, approved and adopted by the Board of Directors, effective: March 17, 2022.*