

NEVADA COPPER

TEAMWORK. INNOVATION. EXECUTION.

ANTI-HARASSMENT, ANTI-DISCRIMINATION AND NON-RETALIATION POLICY

Nevada Copper Corp. and its subsidiaries (“Nevada Copper” or “the Company”) are committed to providing a work environment free of discrimination and harassment in any form because of:

- ✓ Race
- ✓ Religion
- ✓ Creed
- ✓ Ethnicity
- ✓ National Origin
- ✓ Ancestry
- ✓ Sex (including pregnancy)
- ✓ Gender (including gender nonconformity and status as a transgender individual)
- ✓ Sexual Orientation
- ✓ Age
- ✓ Physical or Mental Disability
- ✓ Citizenship
- ✓ Genetic Information
- ✓ Past, current or prospective service in the uniformed services
- ✓ Any other characteristic protected under applicable federal, state, or local law.

All employees, officers and directors will be required to acknowledge receipt and understanding of this Policy. Further, the Company prohibits retaliation against any person for filing a complaint or participating in an investigation of a complaint of a violation of this policy, and will not knowingly permit retaliation by management, employees or co-workers against an employee for filing a complaint or participating in an investigation of a complaint in violation of this policy.

Anti-Harassment Policy

Nevada Copper is committed to maintaining a work environment that is free of harassment. In keeping with this commitment, we will not tolerate harassment of our employees by anyone, including a co-worker, supervisor, visitor, vendor, or customer.

What is harassment?

Unwelcome conduct, whether verbal, physical, or visual that is based on a person's:

-race, religion, creed, ethnicity, national origin, ancestry, sex (including pregnancy), gender (including gender nonconformity and status as a transgender individual)

-sexual orientation, age, physical or mental disability, citizenship, genetic information, past, current or prospective service in the uniformed services, or any other characteristic protected under applicable federal or state law

What does "harassment" include?

It includes but is not limited to:

-slurs, epithets, jokes, derogatory comments or statements, assault, inappropriate physical contact, derogatory posters

-cartoons, drawings, gestures, and other verbal or graphic conduct

Even harassing conduct that does not rise to the level of unlawful harassment or is not prohibited by law in a particular jurisdiction may violate the Company's standards and be grounds for corrective action up to and including termination of employment in compliance with applicable law and labor agreements.

Sexual Harassment

"Sexual harassment" includes:

- ✓ Any harassment based on a person's sex or gender (including pregnancy, sexual

orientation, and status as a transgender individual) regardless of the harasser's sex or gender

- ✓ Offensive remarks based on sex or gender
- ✓ Any unwelcome sexual advances
- ✓ Any requests for sexual favors
- ✓ Any offensive touching
- ✓ Any other verbal, graphic or physical conduct of a sexual nature.

No employee, independent contractor, supervisor or other member of management has the authority to suggest to any employee or applicant that the individual's employment, continued employment, future advancement, or any other term or condition of employment will be affected in any way by the individual's entering into (or refusing to enter into) any form of personal relationship with the employee, independent contractor, supervisor or member of management. Such conduct is a direct violation of this policy.

Furthermore, no employee, independent contractor, supervisor or other member of management has the authority to suggest to any employee or applicant that the individual's employment, continued employment, future advancement, or any other term or condition of employment will be affected in any way by the individual's entering into (or refusing to enter into) any form of personal relationship with the employee, independent contractor, supervisor or member of management. Such conduct is a direct violation of this policy.

VIOLATION OF THIS POLICY WILL SUBJECT AN EMPLOYEE TO DISCIPLINARY ACTION UP TO AND INCLUDING IMMEDIATE TERMINATION.

If you feel that you are being harassed in any way by a co-worker, a customer, or a vendor, or if you witness any such harassment, you must notify your immediate supervisor, manager, or Human Resources manager immediately. Additionally, any supervisors and members of management who observe harassing conduct must report the conduct to their immediate supervisor, manager, and/or Human Resources manager. The matter will be thoroughly investigated, and where appropriate disciplinary action will be taken.

Our independent contractors, supervisors and managers are also covered by this policy and are prohibited from engaging in any form of harassing conduct.

Examples of Prohibited Conduct

Examples of conduct specifically prohibited under our policy against sexual harassment include but are not limited to:

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- Offering or implying an employment-related reward (such as a promotion or raise) in exchange for sexual favors or submission to sexual conduct
 - Threatening or taking a negative employment action (such as termination, demotion, denial of a leave of absence) if sexual conduct is rejected
 - Unwelcome sexual advances or repeated flirtations
 - Unwelcome intentional touching of another person or other unwanted intentional physical contact (including patting, pinching, or brushing against another person's body)
 - Whistling, staring, or leering at another person
 - Asking questions or making comments about another person's sexual activities, dating, personal intimate relationships, or appearance
 - Sexually suggestive or flirtatious gifts
 - Sexually suggestive or flirtatious letters, notes, e-mail or voicemail
 - Conduct or remarks that are sexually suggestive or that demean or show hostility to a person because of the person's gender (including jokes, pranks, teasing, obscenities, obscene or rude gestures or noises, slurs, epithets, taunts, negative stereotyping, threats, blocking of physical movement)
 - Displaying or circulating unwelcome pictures, objects, or written materials (including graffiti, cartoons, photographs, pinups, calendars, magazines, figurines, novelty items) that are sexually suggestive or that demean or show hostility to a person because of the person's gender

Coverage

Nevada Copper absolutely prohibits unlawful harassment during work, during business involving Nevada Copper, or while on Nevada Copper property by any employee (including supervisors/management) or by any non-employee (including customers, visitors and vendors). Nevada Copper further prohibits unlawful harassment at any company events.

Complaint Procedure

If you experience any job-related harassment or have a related complaint you should promptly report the matter to your immediate supervisor, manager, or Human Resources manager. Nevada Copper will undertake an investigation ensuring confidentiality to the greatest possible extent.

If you do not feel comfortable reporting the matter to your supervisor, manager, or Human Resources manager please use our Confidential Reporting Service. Confidential reports may be submitted by contacting Integrity Counts, our Company's third-party anonymous hotline service, as follows:

Submit a report through IntegrityCounts:
Toll Free Call: 1-866-921-6714
Email: nevadacopper@integritycounts.ca
Web:
<https://integritycounts.ca/org/nevadacopper>

Nevada Copper expressly prohibits any form of retaliatory action against any employee availing themselves of the benefits of this procedure. Retaliation is a violation of this policy and may result in corrective action, up to and including termination. No employee will be discriminated against, discharged or retaliated against because of a complaint made in good faith or assisting in the investigation of sexual or other unlawful harassment.

Nevada Copper is committed to enforcing this policy against all forms of discrimination and harassment. However, the effectiveness of our efforts depends largely on employees telling us about inappropriate workplace conduct. Do not assume that Nevada Copper is aware of the problem. If you feel that you or someone else may have been subjected to conduct that

violates this policy, please bring your complaints and concerns to our attention so that we can resolve them.

Employee Procedure

Any employee who believes that he or she has been subjected to any form of discrimination or illegal harassment by anyone is encouraged to promptly tell the person that the conduct is unwelcome and ask the person to stop the conduct.

A person who receives such a request must immediately comply with it and must not retaliate against the employee for requesting the conduct stop.

Complaints of discrimination and/or illegal harassment should be brought to the attention of your immediate supervisor, manager, or Human Resources manager.

Supervisor/Manager

If a supervisor or manager has not received a complaint but suspects that conduct might constitute unlawful harassment, the supervisor or manager will contact their manager and Human Resources Manager, regardless of how the supervisor or manager became aware of the conduct.

Investigation and Resolution

After notification of the employee's complaint, an investigation will immediately be initiated to gather all facts about the complaint.

After the investigation has been completed, a determination will be made by the appropriate Nevada Copper management representative and Human Resources Manager regarding the resolution of the complaint. If warranted, disciplinary action up to and including termination will be imposed against the employee violating Nevada Copper's policies. Other appropriate actions will be taken to correct problems caused by the conduct.

Non-Retaliation

Nevada Copper will not retaliate against an employee for filing a complaint or participating in an investigation of a complaint of a violation of this policy, and will not knowingly permit retaliation by management, employees or co-workers against an employee for filing a complaint or participating in an investigation of a complaint in violation of this policy.

This policy prohibits retaliation against any employee who makes a complaint of a violation of this policy and prohibits retaliation against any employee who assists in investigating such complaints. Retaliation in violation of this policy may result in discipline up to and including termination.

Any employee bringing a bonafide discrimination or illegal harassment complaint or assisting in good faith in the investigation of such a complaint, will not be adversely affected in terms and conditions of employment, nor discriminated against or discharged because of the complaint.

Confidentiality

All complaints will be handled as confidentially as possible.

This policy may seem very explicit and detailed; Nevada Copper is committed to creating a work environment free from unlawful harassment. Unlawful harassment is contrary to the culture we wish to create and will not be tolerated.

In addition to the Company's commitment to providing a workplace free of prohibited discrimination, harassment and retaliation, the Company proudly recognizes the diversity of our work force.

Our employees come from many racial, ethnic and cultural backgrounds, and the Company views this diversity as an important and valuable part of our corporate culture. We encourage all employees to make every reasonable effort to respect the different cultural values, customs and languages that their co-workers may bring into the workplace.

Failure to do so may create an atmosphere of inferiority, isolation, and even intimidation and may even create a perception of discrimination, harassment or retaliation.

As amended, approved and adopted by the Board of Directors, effective: August 6, 2020. Amended and approved March 17, 2022.