



Teamwork. Innovation. Execution

Health, Safety, Environmental and Community Policy (HSEC)

Nevada Copper commits to:

1. Comply with local, state, federal and international health, safety, environmental, community laws, regulations, permit requirements and standards to which we have committed.
2. Employees, contractors, suppliers, investors and visitors shall comply with and immediately report non-compliance with this HSEC Policy.
3. Communicate our HSEC policy to employees and their families, investors, suppliers, contractors and visitors.
4. Identify and prioritize the health, safety, environmental and community aspects of our operations.
5. Implement appropriate practices that reduce risks to human health and safety, the environment and the community.
6. Inform, collaborate with and monitor any third party to assure they comply with applicable HSEC laws and regulations as well as the Company HSEC policy and practices.
7. Continually improve our HSEC performance through sound health, safety and environmental, practices that include:
 - Risk Management
 - Contractor Management
 - Management of Change
 - Incident Management
 - Root Cause Analysis
 - Waste Reduction
 - Emission Controls
 - Water Conservation
 - Community Engagement, and
 - Other HSEC Controls
8. Endeavor to utilize and convert property infrastructure upon the completion of mining for other productive uses.
9. Stabilize and rehabilitate disturbed lands to an appropriate condition that supports the designated post-mining land use.
10. Provide training, authority and necessary resources to implement our HSEC management system.
11. Empower employees, suppliers and contractors to perform health, safety, environmental and community tasks for which they are responsible.
12. Conduct periodic compliance and performance audits to achieve continual improvement.
13. Measure and document the HSEC performance and impact of our operations.
14. Implement the HSEC management system that clearly defines and documents specific actions, practices, procedures and accountabilities needed to comply with and fulfill our commitments.
15. Report performance of the HSEC management system to the Nevada Copper Board of Directors.
16. Maintain as necessary a full range of plans, procedures and guidelines listed in Exhibit 1 to this HSEC Policy.

A handwritten signature in black ink, appearing to read "Randy Buffington", written over a horizontal line.

Randy Buffington
Chief Executive Officer

Date: December 1, 2021



Exhibit 1 to Health Safety, Environmental and Community (HSEC) Policy

The following plans, procedures, practices and guidelines have been developed to implement the HSEC Policy and HSEC Management System: These are subject to amendment, modification, revision as appropriate to update them assure that they follow applicable laws and are consistent with the Performance Standards, the Equator Principles, the HSEC Policy and Good Industry Practice.

Nevada Copper Documents

1. Anti-Corruption Policy
2. Code of Business Conduct and Ethics
3. Discrimination and Harassment Policy
4. Whistle Blower Policy
5. Letter to Employees, Contractors, Vendors and Suppliers (Matt Gili May18-2018)
6. Nevada Copper Employee Handbook
7. Community Engagement Plan
8. Community Health and Safety Plan
9. Grievance Mechanism
 - a. Community Inquiry Concern Form
10. Environmental and Community Management System Overview
11. Construction Management Plan
12. Emergency Response Plan
13. Incident Reporting Protocol
14. Respiratory Protection Program and Procedure
15. Contractor Pre-Work Safety and Environmental Checklist
16. Contractor Closeout Safety and Environmental Checklist
17. Project Life Cycle Model
18. Water Management Plan
19. Air Quality Management Plan
20. Post Mining Land Use Plan
21. Waste Management Plan
22. Spill Prevention Countermeasures and Control
23. Mine Rock & Tailings Management Plan
24. Cultural Resources Management Plan
25. Biodiversity Plan
26. Local Employment and Procurement Plan
27. Hot Work Permit
28. Authorization for Removal of Equipment and Materials
29. Daily Safety Assessment Card



Safety and Health Permits and Authorizations

30. Mine Health and Safety Administration (MSHA) Code of Federal Regulations (30CFR)
 - a. Part 47, Hazard Communication (HazCom)
 - b. Part 48, Training and Retraining of Miners
 - c. Part 50, Notification, Investigation, Reports and Records of Accidents, Injuries, Illnesses, Employment, And Coal Production in Mines
 - d. Part 56 Safety and Health Standards—Surface Metal and Nonmetal Mines
 - e. Part 57, Safety and Health Standards—Underground Metal and Nonmetal Mines
 - f. Part 58, Health Standards for Metal and Nonmetal Mines
 - g. Part 62 Occupational Noise Exposure

Environmental Permits

Nevada Division of Environmental Protection

31. Water Pollution Control Permit WPCP103 – Mining and Processing
32. Water Pollution Control Permit WPCP109 – Dewatering and Water Management
33. Reclamation Permit 0288
34. Air Pollution Control Permit AP1021-3369
35. Stormwater General Permit Stormwater Pollution Prevention Plan (SWPPP)
36. Non-Transient Non-Community Drinking Water System Permit NV00001133

Nevada Division of Water Resources

37. Water Rights
38. Permits and Notifications for Water Impounding Structures
39. Regulations for Water Well and Related Drilling

Other Requirements

40. City of Yerington Annexation and Zoning (M-1, M-2, RC)
41. City of Yerington Building Permits
42. Mineral County Building Permits
43. Nevada State Fire Marshall Hazardous Material Permit 58249