

NEVADA COPPER CORP.

WHISTLE BLOWER POLICY

Nevada Copper Corp. (the "**Company**") has adopted this Whistle Blower Policy (the "**Policy**") as required under Multilateral Instrument 52-110, "Audit Committees", to set out the procedure and contact information for employees, directors, officers and others to report any wrongdoings or suspected wrongdoings within the Company.

This Policy applies to all employees, directors and officers of the Company. 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 the Company, as well as to consultants and contractors to the Company. This Policy is also intended to provide a method for other stakeholders (eg. suppliers, customers, shareholders) to voice any concerns regarding the Company's business conduct.

BACKGROUND

1. What is wrongdoing?

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

- An unlawful act whether civil or criminal;
- Breach of or failure to implement or comply with any approved Company policy, including but not limited to Nevada Copper's Anti-Corruption Policy, Insider Trading Policy, and Code of Business Conduct and Ethics;
- Knowingly breaching federal or provincial laws or regulations;
- Unprofessional conduct or conduct that is below recognized, established standards of practice;
- Questionable accounting or auditing practices;
- Dangerous practices likely to cause physical harm / damage to any person/property;
- Failure to rectify or take reasonable steps to report a matter likely to give rise to a significant and avoidable cost or loss to the Company;
- Abuse of power or authority;
- Unfair discrimination or harassment in the course of employment or provision of services.

This list is not definitive, but is intended to give an indication of the kind of conduct which might be considered as "wrongdoing".

2. Who is protected?

This Policy is set in the context of the regulatory provisions of the Multilateral Instrument 52-110, "Audit Committees". Any employee who makes a disclosure or raises a concern 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; and
- Does not seek any personal or financial gain.

REPORTING CONCERNS

1. Seek Guidance

If an Officer, Employee or Stakeholder is aware of or suspects a Wrongdoing, that employee should immediately inform his or her supervisor. 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 legal counsel, Morgan Hay of Maxis Law in writing (which may be done anonymously as set forth below in section 7), addressed as follows:

- (a) by mail or delivery: Mr. Morgan Hay
Maxis Law
Suite 910, 800 West Pender Street
Vancouver, BC V6C 2V6 Canada
(Marked "Confidential")
- (b) by facsimile: Mr. Morgan Hay
Maxis Law
Fax No.: 604-692-4900
(anonymity cannot be maintained for facsimiles)
- (c) by email: Mr. Morgan Hay
Maxis Law
Email address: mhay@maxislaw.com
(anonymity cannot be maintained for emails)

2. Reporting 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 the Company in writing (which may be done anonymously as set forth below in section 7), addressed as follows:

- (a) by mail or courier: Chair of the Audit Committee
Nevada Copper Corp.
Suite 1238 – 200 Granville Street
Vancouver, BC V6C 1S4
(marked "Confidential")
- (b) by facsimile: Chair of the Audit Committee
Nevada Copper Corp.
Fax No.: 604-681-0122
(anonymity cannot be maintained for facsimiles)

3. Misuse of Reporting Channels

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

4. 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.

5. Time Frames

The Company will investigate reported Wrongdoings as soon as possible. Sometimes, the Company 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.

6. Reporting; Anonymity

When reporting Wrongdoings, the Company prefers that officers and employees identify themselves in order to facilitate the Company's ability to take appropriate steps to address the reported Wrongdoing, including conducting any appropriate investigation. However, the Company 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 the Company will use reasonable efforts to protect the confidentiality of the reporting person subject to applicable law, rule or regulation 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 the Company to evaluate the matter(s) set forth in the anonymous report and, if appropriate, commence and conduct an appropriate investigation.

GENERAL

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

Conversely, nothing in this Policy should be construed or interpreted as expanding applicable standards of liability under provincial or federal law for directors or officers of the Company.

Approved as amended and adopted by the Board effective July 12, 2018.