

NEVADA COPPER CORP.
ANTI-HARASSMENT, NON-DISCRIMINATION,
AND NON-RETALIATION POLICY

Nevada Copper Corp. (“Nevada Copper”) is committed to providing a work environment free of prohibited discrimination, harassment and retaliation. Nevada Copper maintains a strict policy against such conduct, 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, or any other characteristic protected under applicable federal, state, or local law. All employees, officers and directors will be required to acknowledge their receipt and understanding of this Policy.

Anti-Harassment Policy

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

Unlawful harassment consists of unwelcome conduct, whether verbal, or physical, or visual, that is based upon 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. The term “harassment” includes, but is not limited to, slurs, epithets, jokes, derogatory comments or statements, assault, inappropriate physical contact, derogatory posters, cartoons, drawing, gestures, and other verbal, graphic or physical conduct. Nevada Copper will not tolerate harassment.

Sexual Harassment

“Sexual harassment” means any harassment based on someone’s sex or gender (including pregnancy, sexual orientation, and status as a transgender individual) regardless of the harasser’s sex or gender. It includes harassment that is not sexual in nature (for example, offensive remarks), as well as any unwelcome sexual advances, requests for sexual favors, offensive touching, and other verbal, graphic or physical conduct of a sexual nature. Further, 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:

- 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 of 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).
- Unwelcome whistling, staring, or leering at another person.
- Asking unwelcome questions or making unwelcome comments about another person's sexual activities, dating, personal intimate relationships, or appearance.
- Unwelcome sexually suggestive or flirtatious gifts.
- Unwelcome sexually suggestive or flirtatious letters, notes, e-mail, or voice mail.
- Unwelcome 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.

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

- 1) 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.
- 2) 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

- 1) After notification of the employee's complaint, an investigation will immediately be initiated to gather all facts about the complaint.
- 2) 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 bona fide 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.



Discrimination and Harassment Policy Acknowledgement

Nevada Copper maintains a strict policy against discrimination, harassment and retaliation. I acknowledge that I received a copy of Nevada Copper's Anti-Harassment, Non-Discrimination and Non-Retaliation Policy. I acknowledge that I have read the policy, understood it, and agree to comply with it. I understand that Nevada Copper has the maximum discretion permitted by law to interpret, administer, change, modify, or delete this policy at any time, with or without notice. No statement or representation by a supervisor or manager or any other employee, whether oral or written, can supplement or modify this policy. Changes can only be made if approved in writing by the Human Resources Manager. I also understand that any delay or failure by Nevada Copper to enforce any work policy or rule will not constitute a waiver of Nevada Copper's right to do so in the future. I understand that neither this policy nor any other communication by a management representative or any other employee, whether oral or written, is intended in any way to create a contract of employment. I understand that, unless I have a written employment agreement signed by an authorized Nevada Copper representative, **I am employed at will and this policy does not modify my at-will employment status.** If I have a written employment agreement signed by an authorized Nevada Copper representative and this policy conflicts with the terms of my employment agreement, I understand that the terms of my employment agreement will control.

Signature

Printed Name

Date