

## Ethics and Integrity for 2023

In 2024, NorthWest Copper expects to develop and implement additional policies affirming the Company's commitment to a culture of ESG responsibility.

The Company's Code of Business Conduct and Ethics (the "Code") is intended to document the principles of conduct and ethics to be followed by the Company's directors, officers, employees and, where practical, key consultants (collectively, the "Personnel") of the Company. Its purpose is to:

- Reiterate the Company's commitment to full compliance with any local anti-bribery or anti-corruption laws that may be applicable;
- Promote fair dealing with the Company's customers, suppliers, competitors and other third parties;
- Promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Promote avoidance of conflicts of interest, including disclosure to an appropriate person of any material transaction or relationship that reasonably could be expected to give rise to such a conflict;
- Promote full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the relevant Canadian authorities and in other information disseminated to the public;
- Promote compliance with applicable governmental laws, rules and regulations;
- Promote the prompt internal reporting to an appropriate person of violations of this Code;
- Promote accountability for adherence to this Code;
- Provide guidance to Personnel to help them recognize and deal with ethical issues;
- Promote a workplace free from bullying and harassment;
- Provide mechanisms to report unethical or inappropriate conduct; and
- Help foster a culture of honesty and accountability.