



# **WHISTLEBLOWER POLICY**

## Purpose

NewRange Copper Nickel LLC and its subsidiaries (collectively referred to herein as “NewRange,” “we,” “us” or “our”) are committed to creating a culture where employees, contractors, directors, officers and third parties such as customers, suppliers or other stakeholders (hereinafter referred to as “you” or “your”) feel comfortable reporting concerns without fear of retaliation. We are also committed to ensuring that concerns are treated seriously and handled and/or investigated in a manner that protects the identity of individuals who report concerns to the extent possible.

This Policy sets out our approach in respect of the reporting, escalating, handling/ investigating and remedying of reportable concerns related to our business. This Policy is intended to encourage you to bring forward concerns with the knowledge that we will take your concerns seriously, handle and/or investigate them appropriately, and respect your confidentiality. Furthermore, this Policy aims to: reassure you that NewRange will not tolerate any retaliation made against you for making a good faith report, even if it turns out that the concern cannot be substantiated, and guide you on how to report a concern.

## Scope

This policy applies to our employees, contractors, directors, officers and third parties, such as customers, suppliers, or other stakeholders.

## Policy Statement

You must promptly report Reportable Concerns to NewRange by submitting them to your manager, any member of senior management, NewRange’s Human Resources department or anonymously through the reporting concerns hotline.

What should you include in a report about a Reportable Concern? NewRange encourages you to provide a report with as much detail as possible to ensure the concern can be fully and promptly handled and/or investigated. You should include the “who, what, where, when, how and why?” of the Reportable Concern, as well as any other corroborating information that could help NewRange investigate the concern.

The specific steps taken to handle and/or investigate a Reportable Concern depend on its nature. NewRange will determine the nature of the Reportable Concern by considering factors such as:

- whether it relates to a potential breach of applicable law;
- the potential consequence and/or exposure for NewRange;
- whether the alleged misconduct is ongoing or not, and/or;
- the nature of any technical, financial or legal advice that may be required to support the handling and/or investigation of the Reportable Concern.

Depending on its nature, the Reportable Concern will either be:

- handled and/or investigated by NewRange, or;
- handled and/or investigated by external specialists.

### Protecting Whistleblower's Identity

If you are uncomfortable submitting a Reportable Concern to your manager, for any reason, or wish for anonymity and confidentiality, you may submit a Reportable Concern to the toll-free 24-hour hotline or website, administered by an independent company which is maintained for employees to report Reportable Concerns anonymously. This service is available to submit Reportable Concerns without providing your name.

Reportable Concern Hotline Number: **866.946.5558**

Reportable Concern Website: **[www.workshieldportal.com](http://www.workshieldportal.com)**

All reports and investigations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Individuals involved in the handling and/ or investigation of a Reportable Concern will not share any personally-identifiable information relating to the investigation unless:

- the individual has already consented to disclosing his or her identity;
- it is required by law; or
- it is necessary to provide such information for the purposes of handling and/or investigating the Reportable Concern, in which case NewRange will take all reasonable steps to reduce the risk that the individual will be identified because of the handling and/or investigation.

In addition to raising Reportable Concerns with NewRange, you also have the option of contacting the appropriate government regulators.

Nothing in this Policy prohibits or is intended to restrict or impede employees from discussing the terms and conditions of their employment with co-workers or exercising protected rights under Section 7 of the National Labor Relations Act, or otherwise disclosing information as permitted by law.

### Definitions

**Reportable Concern** means any conduct which you reasonably suspect amounts to misconduct or an improper situation or circumstances in relation to an entity within NewRange. Examples of such conduct are:

- bribery or corruption;
- fraud, money laundering, theft or improper use of NewRange property or funds;
- undeclared conflicts of interest;
- anti-competitive behavior;
- insider trading;
- breach of sanctions;

- violations of internal accounting controls, reporting fraudulent financial information or any other auditing, accounting or financial irregularity;
- violations of NewRange policies and standards, including, without limitation, the Code of Ethics;
- unsafe work practices and other significant safety concerns;
- conduct that represents a risk of causing harm to the natural environment.

Concerns regarding workplace issues that do not implicate legal, compliance, or regulatory concerns are not Reportable Concerns under this policy.

**Retaliation** means any adverse action which you may suffer because you have raised a Reportable Concern. NewRange will not retaliate or tolerate retaliation against anyone who, in good faith, raises a Reportable Concern or assists in the investigation of a Reportable Concern. If you become aware of retaliation occurring in violation of this policy, whether against you or someone else, you should immediately report such retaliation to your supervisor, a member of senior management, or Human Resources so that it may be addressed.

## Ownership and/or Approval

This policy is owned and administrated by our Compliance Officer with support from other nominated representatives. The Policy and Standards Committee is responsible for the review and governance of NewRange's Compliance Program and policies, inclusive of this policy.

We will regularly review and update this Whistleblower Policy to ensure its effectiveness and alignment with applicable laws, local regulations, and international standards.

## Questions

If you have any questions relating to this policy, please contact our Compliance Officer.

## References

Refer to our Code of Ethics for additional information.

# “PROVIDING THE MINERALS FOR A NEW, BETTER FUTURE”

<b>ISSUED BY</b>	Legal
<b>ISSUE DATE</b>	May 2023
<b>PILLAR</b>	1 Leadership, People, and Culture
<b>VERSION</b>	1
<b>DOCUMENT NUMBER</b>	NR-01-LGL-POL-001-V1

This policy has been approved by the NewRange Copper Nickel, LLC Board of Managers

---

## **NewRange Copper Nickel, LLC**

### **Head Office and NorthMet Project Office**

6500 Kensington Drive  
Hoyt Lakes, MN USA 55750

### **Mesaba Project Office**

23 Commerce Road  
Babbitt, MN USA 55706

**TEL** +1 218 471 2150  
**WEB** [newrangecoppernickel.com](http://newrangecoppernickel.com)