

NGEx Minerals Ltd.

(together with its subsidiaries, the "NGEx")

RESPONSIBLE MINERAL EXPLORATION AND DEVELOPMENT POLICY

(as adopted by the Board of Directors on November 6, 2024 and amended on June 19, 2025)

Preamble

NGEx is a Canadian exploration and development company focused on advancing its Lunahuasi copper-gold-silver project located in San Juan Province, Argentina and its Los Helados copper-gold development project located in Region III, Chile, of which NGEx is the majority partner and operator. Our mission is to responsibly explore and develop our assets while creating meaningful, long-term value for our stakeholders. We are committed to setting a solid foundation for a sustainable future by adhering to the practices and commitments outlined in this policy.

Governance Commitments

<u>Board Oversight:</u> The Board's Safety and Sustainability Committee ("SSC") is responsible
for oversight and compliance of the Responsible Mineral Exploration and Development
Policy (the "Policy"). The Policy shall be reviewed at least annually.

• Ethical Standards:

- We will uphold integrity, transparency, honesty, and accountability in our interactions with all stakeholders.
- Code of Business Conduct & Ethics, containing our guiding principles, will be communicated internally and externally, including an annual review process with directors, employees and consultants.
- We will encourage stakeholders to report concerns through the mechanisms contained in our Whistleblower Policy.
- <u>Legal Compliance</u>: We will meet or exceed local, national, and international laws and regulations.
- <u>Disclosures</u>: We will commit to transparent reporting on environmental and social impacts and contributions to our stakeholders through annual sustainability disclosures.
- International Standards: We will strive for alignment with industry good practices and international standards.
- Risk Management: We will strive to assess, mitigate, and manage risks as NGEx's projects evolve.

Social Commitments

Health & Safety:

- We will prioritize the safety and well-being of all employees and contractors.
- The Chief Executive Officer and the SSC will review health and safety indicators quarterly and take proactive measures for continuous improvement.
- <u>Emergency Response</u>: We will take actions to reduce the potential for accidents and emergency situations and implement emergency response plans.

Community Engagement and Development:

• We will build trust through engaging with community stakeholders with openness and respect to understand and address their concerns.

Human Rights:

- We will respect human rights, ensuring the dignity, safety, and well-being of our workers, contractors and community members impacted by our activities.
- We will respect the rights and traditions of Indigenous peoples in whose traditional territories we operate and we will consult and engage with them about our activities in a respectful and culturally appropriate manner.
- We will implement and maintain a grievance mechanism for community members to raise concerns about actual or potential impacts to their rights.

Our Workforce:

- We will foster an inclusive work environment that values equity and diversity and enables our workforce to thrive.
- We will promote training and equal employment opportunities to develop our workforce.

Environmental Commitments

- <u>Water Resource Management</u>: We will manage water, with an emphasis on water conservation and contamination prevention.
- <u>Environmental Stewardship</u>: We will promote environmental stewardship to guide our projects' designs to avoid, minimize, and mitigate adverse environmental impacts.
- <u>Innovation and technology</u>: We will leverage innovation and technology whenever feasible to minimize our environmental footprint, contribute to responsible and sustainable mineral exploration practices, and drive efficiencies.
- <u>Climate Change</u>: We will begin accounting for our carbon footprint and managing the carbon emissions related to our activities.
- <u>Waste Management</u>: We will develop and implement waste management strategies that seek to minimize the environmental impact of mineral exploration.

• <u>Biodiversity</u>: We acknowledge the significance of biodiversity, and we will manage our impact through preparatory and management activities within our operational areas.

This Responsible Mineral Exploration and Development Policy will be annually distributed to all employees, directors, officers, and consultants of the Corporation and made available on the NGEx's website. New members will receive a copy of the policy and be briefed on its significance upon joining NGEx.