



(the "Company")

## HEALTH, SAFETY, ENVIRONMENT & COMMUNITY POLICY

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### 1. PURPOSE

- 1.1** The purpose of this health, safety, environment & community policy (the "Policy") is to ensure that Kodiak Copper Corp. ("Kodiak" or the "Company") is committed to operating in a safe and sustainable manner, respecting our environment and investing in our people and local communities.

### 2. HEALTH, SAFETY, ENVIRONMENT & COMMUNITY PRINCIPLES

The Company and its directors, officers, employees, management company employees and consultants (collectively referred to herein as "Personnel") shall comply with the following obligations:

- 2.1** Meeting legal requirements and good industry practice with respect to health, safety and sustainability, exceeding them when possible and appropriate.
- 2.2** Fostering a culture of personal, environmental and social responsibility.
- 2.3** Maximizing the benefits gained by all stakeholders from the extraction of resources.
- 2.4** Striving to achieve zero harm of our employees and contractors by ensuring health and safety remain a priority in all activities we perform.
- 2.5** Implement health and safety management systems that meet industry best practice, including setting objectives and targets and measuring against them.
- 2.6** Maintaining dialogue and continuous engagement with our stakeholders to ensure transparency and to understand their perspective, and to keep them informed of our activities.
- 2.7** Respecting the history and customs of local communities, contributing to positive community outcomes and promoting local employment and procurement.
- 2.8** Strive for excellence in environmental management so the impact of our activities is minimized and we achieve a high level of environmental performance.
- 2.9** Effectively manage the environmental footprint and the use of energy, water and other natural resources in all our activities.
- 2.10** Contributing to the conservation of biodiversity by promoting responsible land management practices.
- 2.11** Developing, implementing, maintaining, and monitoring appropriate tools that allow us to evaluate and manage socio-environmental impacts, risks, and opportunities.
- 2.12** Continually improve our health, safety and environmental performance, as well as stakeholder engagement practices.

### 3. COMPLIANCE WITH THIS POLICY

- 3.1** It is the responsibility of all Personnel to be aware of their obligations under and to comply with this Policy. All breaches of this Policy shall immediately be reported to the CEO or CFO. All reports by an individual of violations will be kept confidential except if otherwise required by law.

## COMPENSATION & GOVERNANCE COMMITTEE MANDATE

Individuals who breach the Policy may be subject to disciplinary action including, but not limited to, dismissal. Individuals should be aware that in addition to any disciplinary action taken by the Company, violations of this Policy may require restitution and may lead to civil or criminal action against individual employees, directors and officers and any company involved. Retaliation in any form against any individual who reports a violation of this Policy or of law in good faith, or who assists in the investigation of a reported violation, is itself a serious violation of this Policy. Acts of retaliation should be reported immediately to the CEO or CFO and will be disciplined appropriately.

- 3.2** Personnel are required to acknowledge that they have read this Policy when they are engaged or when the Policy is introduced, and annually thereafter.
- 3.3** The Company asks that each member of the Personnel review the Policy periodically and take the opportunity to discuss with the CEO or CFO any circumstances that may have arisen which could be an actual or potential violation of this Policy.

Original approval date:	January 20, 2021
Revised date:	n/a
Approved by:	Board of Directors