

ALTA COPPER CORP.

WHISTLEBLOWER POLICY

General

Alta Copper Corp. (the "Company") has implemented a Code of Ethics (the "Code") that requires its directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Company and its subsidiaries, they are expected to practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all directors, officers and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No director, officer or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. A director, officer or employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Company rather than seek resolution outside the Company.

Reporting Violations

It is the responsibility of all directors, officers and employees to report all suspected violations in accordance with this Whistleblower Policy. The Company maintains an open-door policy and suggests that you share your questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, your supervisor is in the best position to address an area of concern as he or she may be more knowledgeable about the issue and will appreciate being brought into the process. It is the supervisor's responsibility to help you to solve the problem.

If you are uncomfortable speaking with your supervisor, or if your supervisor has not, in your view, responded appropriately, the Company has established a Compliance Contact to assist you. The Compliance Contact is the Chair of the Audit Committee.

Compliance Contact

Chair of the Audit Committee
Alta Copper Corp.
Mr. Steven Latimer
Suite 801-1112 West Pender Street
Vancouver, BC, Canada V6E 2S1
Email: steven.latimer@icloud.com

Information a Whistleblower Needs to Report

To assist the Company in the response to or investigation of a concern, the report should contain

as much specific, factual information as possible to allow for proper assessment of the nature, extent and urgency of the matter.

If possible, you should include the following information:

Details of the event, matter or issue that is the subject of the report;

The name of each person involved;

If the complaint involves a specific event or events, the approximate date and location of each event; and

Any additional information, documentation or other evidence available to support the complaint.

Investigations of Complaints

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. The Company shall retain records of complaints for a period of no less than seven years.

Protection against Retaliation, Harassment or Victimization

The Company is committed to ensuring that a whistleblower is not disadvantaged in any way or subject to retaliation, harassment or victimization for validity raising concerns about suspected reportable behavior.

If the whistleblower feels that reprisals have been taken, he or she can appeal to the Compliance contact outlined before.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense and may be subject to legal and civil action in addition to employment review.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. All complaints or submissions will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

This Policy was approved and adopted by the Board of Directors of Alta Copper with immediate effect on November 17, 2025.

All directors, officers and employees of Alta Copper and its subsidiaries are expected to comply with this policy. This policy will be strictly enforced, and violations will be dealt with immediately, including subjecting the transgressor to corrective and/or disciplinary action, including without limitation, dismissal or removal from office.

Please sign and return the Acknowledgment of Receipt of the Whistleblower Policy set out in Schedule A.

SCHEDULE A

ACKNOWLEDGMENT OF RECEIPT OF WHISTLEBLOWER POLICY

Date: _____

To: Corporate Secretary

I have received and read the Whistleblower Policy of Alta Copper Corp., to which the above heading refers and confirm that I will comply with it.

SIGNED: _____

NAME: _____