NOVAGOLD Resources Inc.

2025 CDP Corporate Questionnaire 2025

Word version

Important: this export excludes unanswered questions
This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.
Read full terms of disclosure

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04/08/2026, 07:37 pm

Contents

C1. Introduction

(1.1) In which language are you submitting your response?

Select from:

☑ English

(1.2) Select the currency used for all financial information disclosed throughout your response.

Select from:

☑ USD

(1.3) Provide an overview and introduction to your organization.

(1.3.2) Organization type

Select from:

☑ Publicly traded organization

(1.3.3) Description of organization

NOVAGOLD is actively involved in the gold mining industry primarily focusing on advancing the development-stage Donlin Gold project located in Alaska. The Donlin Gold project is owned by Donlin Gold LLC, a limited liability company owned equally by wholly-owned subsidiaries of NOVAGOLD Resources Inc. ("NOVAGOLD") and Barrick Mining. NOVAGOLD is a financially secure precious metals company primarily dedicated to developing its 50 percent owned Donlin Gold project situated in Alaska, which is renowned as one of the safest mining jurisdictions globally. For the purposes of this questionnaire, we report Donlin Gold's impact on a 100% basis. Our company-wide facilities are distributed as follows: the Donlin Gold project constitutes 33%, NOVAGOLDs Salt Lake City office constitutes another 33%, and NOVAGOLDs Vancouver office constitutes the remaining third. Currently NOVAGOLD does not produce gold or any other minerals and our operations remain at the permitting and development stage. Funding for exploring our mineral properties and operating the company has been primarily sourced from previous equity financings through public offerings of common shares and warrants, debt financing through convertible notes and asset sales. NOVAGOLD anticipates continuing to raise capital through additional equity or debt financings, and other means. With approximately 39 million ounces of gold in the measured and indicated mineral resource categories including proven and probable mineral reserves 541 million tonnes at an average grade of approximately 2.24 grams per tonne in the measured and indicated resource categories on a 100 percent basis, the Donlin Gold project is recognized as one of the largest highest-grade and most promising open pit gold deposits globally According to the NI 43-101 Technical Report dated June 1, 2021, the Donlin Gold project is expected to produce an average of more than one million ounces of gold per year over a 27-year mine life on a 100 percent basis once in production. The project also holds significant exploration potential beyond its*

*current footprint which spans three kilometers of an approximately eight-kilometer long gold-bearing trend. Current activities at Donlin Gold focus on state permitting, optimization work, community outreach, and workforce development in preparation for future construction and operations. With a strong balance sheet, NOVAGOLD is well positioned to finance its share of permitting and optimization efforts at the Donlin Gold project. Donlin Gold is deeply committed to partnering with Alaska Native communities both near the project and across the state. Notably, the project is situated on private land designated for mining activities fifty years ago distinguishing it from many other mining assets in Alaska. Donlin Gold entered into life of mine agreements with the Calista Corporation which owns subsurface mineral rights, and The Kuskokwim Corporation comprised of 10 village corporations that own surface land rights. These agreements include a revenue sharing framework, the proceeds of which will be shared pursuant to the terms of the Alaska Native Claims Settlement Act (ANSCA) of 1971 which allocated 44 million acres of land for Alaska Native Corporations' use. These partnership activities and programs underscore our dedication to the sustainable and responsible development of the Donlin Gold project for the benefit of all stakeholders. NOVAGOLD upholds responsible mining practices prioritizing human life, promoting good health, stewarding the environment, and contributing to local community wellbeing. NOVAGOLD believes in collaborative mine development with local stakeholders to minimize environmental impacts while fostering economic opportunities. Our commitment to sustainable development includes conserving natural resources and the environment where possible and striving for the highest standards in workforce performance. *This CDP Questionnaire covers the period from January 1, 2024, to December 31, 2024 – prior to NOVAGOLD's June 3, 2025 announcement, "NOVAGOLD and Paulson Advisers Complete $1 Billion Acquisition of Barrick Mining's 50% Interest in Donlin Gold", regarding the successful completion of the previously disclosed acquisition of Barrick Mining's ("Barrick's") 50% interest in the Donlin Gold project, increasing NOVAGOLD's ownership interest to 60% and establishing new ownership of Donlin Gold LLC to advance the Donlin Gold project in Alaska. [Fixed row]*

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

(1.4.1) End date of reporting year

12/31/2024

(1.4.2) Alignment of this reporting period with your financial reporting period

Select from:

☑ No

(1.4.3) Indicate if you are providing emissions data for past reporting years

Select from:

☑ Yes

(1.4.4) Number of past reporting years you will be providing Scope 1 emissions data for

Select from:

☑ 5 years

(1.4.5) Number of past reporting years you will be providing Scope 2 emissions data for

Select from:

☑ 5 years

(1.4.6) Number of past reporting years you will be providing Scope 3 emissions data for

Select from:

☑ Not providing past emissions data for Scope 3

[Fixed row]

(1.4.1) What is your organization's annual revenue for the reporting period?

0

(1.5) Provide details on your reporting boundary.

(1.5.1) Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?

Select from:

☑ No

(1.5.2) How does your reporting boundary differ to that used in your financial statement?

NOVAGOLD's financial reporting is based on a fiscal year ending November 30, meaning our audited financial statements cover the period from December 1 to November 30. However, for CDP reporting purposes, we use a calendar year boundary from January 1 to December 31, in line with CDP's standard framework. This approach ensures consistency with CDP guidelines and comparability with other organizations, while the difference in reporting periods does not impact the accuracy or integrity of the information disclosed.

[Fixed row]

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

CA66987E2069

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

66987E206

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

NG

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:
☑ No

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:
☑ No

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:
☑ No

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:
☑ Yes

(1.6.2) Provide your unique identifier

CIK Code - 0001173420; SIC Code 1040
[Add row]

(1.7) Select the countries/areas in which you operate.

Select all that apply
☑ Canada
☑ United States of America

(1.17) In which part of the metals and mining value chain does your organization operate?

Mining
☑ Gold

(1.18) Provide details on the mining projects covered by this disclosure, by specifying your project(s) type, location and mining method(s) used.

Row 1

(1.18.1) Mining project ID

Select from:
☑ Project 1

(1.18.2) Name

Donlin Gold Project

(1.18.3) Share (%)

50

(1.18.4) Country/Area

Select from:

☑ United States of America

(1.18.5) Latitude

62.054167

(1.18.6) Longitude

158.183888

(1.18.7) Project stage

Select from:

☑ Development

(1.18.8) Mining method

Select from:

☑ Open-cut

(1.18.9) Raw material(s)

Select all that apply

☑ Gold

(1.18.12) Description of project

The Donlin Gold project is situated in the historic Kuskokwim Gold Belt of Southwest Alaska, about 10 miles north of Crooked Creek. Managed by Donlin Gold LLC, which is owned 50/50 by NOVAGOLD and Barrick Mining, Donlin Gold is one of the largest known undeveloped gold deposits. It has Measured and Indicated Mineral Resources totaling approximately 39 million ounces of gold, with a grade of 2.24 grams per tonne, and Proven and Probable Mineral Reserves of 34 million ounces at 2.09 grams per tonne. Additionally, there are around six million ounces of Inferred Resources at an average grade of 2.02 grams per tonne. Donlin Gold stands out for its high grade compared to other open-pit projects. Its after-tax Net Present Value (NPV) at a gold price of US$1,500 per ounce and a 5% discount rate is estimated at US$3.0 billion, as detailed in the NI 43-101 and S-K 1300 Technical Reports. This value rises to US$13.1 billion undiscounted. Sensitivity analysis shows the NPV increases to US$4.9 billion at US$1,700 per ounce and to US$7.2 billion at US$2,000 per ounce, with undiscounted values reaching US$17.5 billion and US$22 billion, respectively. Donlin Gold has strong support from Alaska Native Corporation stakeholders, including Calista and TKC, who own the mineral and

*surface rights. The project is located on private land selected by Calista for its mineral resources. NOVAGOLD's commitment to social engagement and environmental stewardship is well-regarded, with Donlin Gold being cited by the Alaska government as a model for responsible development. * This CDP Questionnaire covers the period from January 1, 2024, to December 31, 2024 – prior to NOVAGOLD's June 3, 2025 announcement of the successful closing of their previously disclosed acquisition of Barrick Mining Corporation's ("Barrick's") 50% interest in the Donlin Gold project, establishing new ownership of Donlin Gold LLC to advance the Donlin Gold project in Alaska."*
[Add row]

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:

☑ No, and we do not plan to do so within the next two years

(1.24.4) Highest supplier tier known but not mapped

Select from:

☑ Tier 1 suppliers

(1.24.8) Primary reason for not mapping your upstream value chain or any value chain stages

Select from:

☑ Other, please specify :Premature to map the upstream value chain or other value chain stages

(1.24.9) Explain why your organization has not mapped its upstream value chain or any value chain stages

NOVAGOLD's value chain will change significantly with progress in development at Donlin Gold, NOVAGOLD has chosen not to map the upstream value chain at this point until such time where this information will be available. At present NOVAGOLD considers it premature to map the upstream value chain or other value chain stages for Donlin Gold. The project is still in the development phase and undergoing the permitting process which began in 2012. Although key federal and state permits have been obtained, additional permits are required before operations can commence and no construction decision has been made, hence, Donlin Gold does not yet produce gold or generate operating earnings with activities limited to exploration and development planning.
[Fixed row]

(1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?

(1.24.1.1) Plastics mapping

Select from:

☑ No, and we do not plan to within the next two years

(1.24.1.5) Primary reason for not mapping plastics in your value chain

Select from:

☑ Other, please specify :Premature to map upstream value chain or other value chain stages

(1.24.1.6) Explain why your organization has not mapped plastics in your value chain

At present NOVAGOLD considers it premature to map the upstream value chain or other stages for the Donlin Gold project, since it's still in the development phase and undergoing the permitting which began in 2012. Although key federal and state permits have been obtained, no construction decision has been made yet and additional permits are required before operations can commence. As a result, Donlin Gold does not yet produce gold or generate operating earnings.
[Fixed row]

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Short-term

(2.1.1) From (years)

1

(2.1.3) To (years)

2

(2.1.4) How this time horizon is linked to strategic and/or financial planning

The Donlin Gold project is a development stage project currently in the permitting process, which began in 2012. NOVAGOLD has been involved in the project for more than 20 years. While federal permits were obtained in 2018 and most key State permits have been secured, additional permits are still required to operate, and no construction decision has been made. Consequently, the short-term time horizon is considered to be 1 to 2 years, during which risks and issues are assumed to align with current activities such as advanced exploration and finalizing permits. In this short-term period, climate change, water management, and other sustainability aspects are considered, with identified risks anticipated to remain relatively consistent with those observed over the past decade.

Medium-term

(2.1.1) From (years)

2

(2.1.3) To (years)

7

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Medium term risks are considered to be those associated with actual project development assuming that construction and development begin within the near-term Completion of the development of the Donlin Gold project is subject to various requirements including the availability and timing of acceptable arrangements for power water transportation access and facilities The lack of availability on acceptable terms or the delay in the availability of any one or more of these items could prevent or delay development of the project There can be no assurance that adequate infrastructure including access and power supply will be built in a timely manner or that the cost of such infrastructure will be reasonable or that it will be sufficient to satisfy the requirements of the project During this time NOVAGOLD foresees that the imposition of international treaties and or US or Canadian federal state provincial laws and or local laws or regulations pertaining to mandatory reductions in energy consumption or emissions of greenhouse gases could affect the feasibility of mining projects and increase operating costs Delays in the ice breakup or early freeze up low flow levels and water depths or other conditions affecting the Kuskokwim River could delay or prevent Donlin Gold from transporting supplies to the site Any such interference with the delivery of needed supplies to the Donlin Gold project could adversely affect the construction or operation of the project.

Long-term

(2.1.1) From (years)

7

(2.1.2) Is your long-term time horizon open ended?

Select from:

☑ No

(2.1.3) To (years)

50

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Based on current production projections the mine would have a 27-year mine life once in production. With respect to climate change the Company has focused on planning for full-scale operations which is anticipated to be years into the future to be as resilient as possible given the capital intensity of this asset and mine life longevity while ensuring that the current activities are in line with the values that NOVAGOLD sees essential to uphold. Climate change based strategic decisions have therefore been incorporated primarily into longer-term full-scale operations planning. Climate changes could affect the availability of water required to sustain operations at the Donlin Gold project. Also management of water is an essential component of the projects operating plans. Climate change could require modifications to the projects water management plan which may require additional capital investments or increase operating costs if precipitation increases or

decreases relative to historical records. Additional technologies may become available in the long term which may aid in addressing and mitigating against climate change related risks [Fixed row]
[Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process	Biodiversity impacts evaluated before the mining project development stage
	Select from: ☑ Yes	*Select from:* ☑ Both dependencies and impacts	*Select from:* ☑ Yes, in all cases

[Fixed row]

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	Select from: ☑ Yes	*Select from:* ☑ Both risks and opportunities	*Select from:* ☑ Yes

[Fixed row]

(2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☑ Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ End of life management

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☑ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ More than once a year

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ Site-specific

(2.2.2.12) Tools and methods used

Enterprise Risk Management

☑ Enterprise Risk Management

☑ Stress tests

International methodologies and standards

☑ Environmental Impact Assessment

Other

☑ Desk-based research

☑ External consultants

☑ Partner and stakeholder consultation/analysis

☑ Scenario analysis

(2.2.2.13) Risk types and criteria considered

Acute physical

☑ Cold wave/frost

☑ Flood (coastal, fluvial, pluvial, ground water)

☑ Heavy precipitation (rain, hail, snow/ice)

☑ Storm (including blizzards, dust, and sandstorms)

☑ Wildfires

Chronic physical

☑ Permafrost thawing

☑ Soil degradation

☑ Other chronic physical driver, please specify :Hydrological variability; Extended periods of extreme cold

Policy

☑ Carbon pricing mechanisms

☑ Increased difficulty in obtaining operations permits

☑ Other policy, please specify :Uncertainty over emerging regulation

Market

☑ Availability and/or increased cost of raw materials

☑ Other market, please specify :Increasing investor pressure re. climate; Supply chain stability; Contractors unavailable

Reputation

☑ Other reputation, please specify :Confidence and perceptions

Technology

☑ Other technology, please specify :Transition to low-C

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☑ Local communities

☑ Indigenous peoples

☑ Other, please specify :Contractors;

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

☑ No

(2.2.2.16) Further details of process

The Final Environmental Impact Statement (FEIS) for the Donlin Gold project plays a critical role in identifying, assessing, and managing environmental risks associated with development. It addresses climate change directly by emphasizing the importance of robust, flexible closure plans and end-of-mine life strategies. Recognizing risks such as altered precipitation patterns, rising temperatures, and permafrost degradation, the FEIS outlines adaptive strategies to ensure long-term environmental protection. These include designing resilient infrastructure to withstand extreme weather, implementing flexible water management systems, and applying reclamation techniques that consider changes in vegetation and soil stability. Continuous monitoring and adaptive management are central to this approach, enabling real-time adjustments as climate conditions evolve. NOVAGOLD takes a proactive, integrated approach to risk and sustainability management at both the corporate level and at Donlin Gold. NOVAGOLD takes a proactive, integrated approach to risk and sustainability management at both the corporate level and at Donlin Gold. Proactive management of current and emerging risks and opportunities is embedded across the organization. In 2022, NOVAGOLD updated its risk management process following a series of workshops held across departments. This process is supported by an enhanced, centralized risk register that includes sustainability risks—specifically climate- and nature-related risks—and serves as the main repository for risk and control information. The risk register is scheduled to be updated again in 2025 to reflect evolving risk landscapes and ensure continued alignment with best practices. Climate and nature-related considerations are also embedded into our external reporting practices. NOVAGOLD aligns its disclosures with key frameworks, including the Task Force on Climate-related Financial Disclosures (TCFD) and the Global Reporting Initiative (GRI). Since 2023, TCFD-aligned disclosures have been central to our annual Sustainability Report, supported by a TCFD index guiding stakeholders to relevant sections. Looking ahead to 2025, we are beginning to incorporate elements of the Taskforce on Nature-related Financial Disclosures (TNFD) framework, recognizing the growing importance of nature-related dependencies and risks in project development and long-term

sustainability planning. Climate and nature-related risks are evaluated during dedicated risk workshops and are embedded within our broader enterprise risk management structure, which supports consistent and transparent risk oversight across operations. This comprehensive and evolving approach reflects NOVAGOLD's ongoing commitment to responsible environmental stewardship, strategic risk management, and long-term value creation for all stakeholders.

Row 2

(2.2.2.1) Environmental issue

Select all that apply

☑ Water

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ More than once a year

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ Site-specific

(2.2.2.12) Tools and methods used

Other

☑ External consultants

☑ Internal company methods

☑ Partner and stakeholder consultation/analysis

(2.2.2.13) Risk types and criteria considered

Acute physical

☑ Flood (coastal, fluvial, pluvial, ground water)

Chronic physical

☑ Declining water quality

☑ Water availability at a basin/catchment level

☑ Water stress

☑ Water quality at a basin/catchment level

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☑ Local communities

☑ Indigenous peoples

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

☑ No

(2.2.2.16) Further details of process

NOVAGOLD has enhanced its Enterprise Integrated Risk Management Systems, now encompassing routine assessment of water risks within environmental risk evaluations. As the project progresses, these assessments will be further integrated, particularly during construction and development phases. Currently, NOVAGOLD's environmental focus centers predominantly on activities at the Donlin Gold project, with minimal water usage during the exploration and pre-development stages. Our commitment extends to supporting a comprehensive project development plan that addresses life-of-mine risks and opportunities—from exploration through construction, operation, and eventual closure and reclamation. Early engagement with local communities and Alaska Native Corporations provided valuable traditional knowledge, guiding the placement, layout, and design of project infrastructure, including water management systems, to safeguard sensitive habitats and landscapes. This collaboration was integral to the Donlin Gold FEIS, incorporating feedback from stakeholders in the Y-K region. In 2024, Donlin Gold continued field and geochemical data collection to refine source characteristics for groundwater and surface water models, supporting both operational and closure planning. Progress was also made in advancing the Donlin Gold resource model. Additionally, restoration efforts at the historic Lyman family placer site continued, with significant milestones achieved, including the creation of new stream and pond habitats designed to enhance access and use by fish and other aquatic life. All runoff from ongoing activities, including drill sites, is meticulously managed to uphold water quality, complying with State permit requirements. Water withdrawals and uses are authorized by the State of Alaska to protect local water resources and aquatic life. The current camp utilizes groundwater wells for domestic water, with sanitary wastewater treated in a leach field for recycling to the sub-surface environmental risks associated with current camp operations, including septic wastewater and waste management, are minimal due to the site's non-operational status and absence of industrial waste generation. Primary water-related risks are anticipated to arise with the Donlin Gold project's full-scale construction and operation phases. Measures are in place to prevent uncontrolled discharge of mine-affected water, ensuring compliance with rigorous permit standards through utilization or treatment prior to discharge in the milling process wherever feasible.

Row 3

(2.2.2.1) Environmental issue

Select all that apply

☑ Biodiversity

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.6) Mining projects covered

Select all that apply

☑ All disclosed mining projects

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ More than once a year

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ Site-specific

(2.2.2.12) Tools and methods used

Enterprise Risk Management

☑ Enterprise Risk Management

Other

☑ External consultants

☑ Internal company methods

☑ Partner and stakeholder consultation/analysis

(2.2.2.13) Risk types and criteria considered

Chronic physical

☑ Increased ecosystem vulnerability

☑ Reserves located in or adjacent to areas important for biodiversity

☑ Threatened species in or near mining operation

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☑ Local communities

☑ Indigenous peoples

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

☑ No

(2.2.2.16) Further details of process

NOVAGOLD has enhanced its Enterprise Integrated Risk Management Systems now encompassing routine assessment of water risks within environmental risk evaluations. As the project progresses these assessments will be further integrated particularly during construction and development phases when water-related risks become more pertinent. Currently NOVAGOLDs environmental focus centers predominantly on activities at the Donlin Gold project with minimal water usage during the exploration and predevelopment stages. Our commitment extends to supporting a comprehensive project development plan that addresses life-of-mine risks and opportunities from exploration through construction operation and eventual closure and reclamation. Early engagement with local communities and Alaska Native Corporations provided valuable traditional knowledge guiding the placement layout and design of project infrastructure including water management systems to safeguard sensitive habitats and landscapes. This collaboration was integral to the Donlin Gold FEIS incorporating feedback from stakeholders in the Y-K region. In 2024, Donlin Gold continued field and geochemical data collection to refine source characteristics for groundwater and surface water models, supporting both operational and closure planning. Progress was also made in advancing the Donlin Gold resource model. Additionally, restoration efforts at the historic Lyman family placer site continued, with significant milestones achieved, including the creation of new stream and pond habitats designed to enhance access and use by fish and other aquatic life. All runoff from ongoing activities including drill sites is meticulously managed to uphold water quality complying with State permit requirements. Water withdrawals and uses are authorized by the State of Alaska to protect local water resources and aquatic life The current camp utilizes groundwater wells for domestic water with sanitary wastewater treated in a leach field for recycling to the subsurface environmental risks associated with current camp operations including septic wastewater and waste management are minimal due to the sites nonoperational status and absence of industrial waste generation. Primary water-related risks are anticipated to arise with the Donlin Gold projects full-scale construction and operation phases. Measures are in place to prevent uncontrolled discharge of mine-affected water ensuring compliance with rigorous permit standards through utilization or treatment prior to discharge in the milling process wherever feasible.
[Add row]

(2.2.3) Provide mining-specific details of your organization’s process for identifying, assessing, and managing biodiversity impacts.

Row 1

(2.2.3.1) Mining project ID

Select from:

☑ Project 1

(2.2.3.2) Extent of assessment

Select from:

☑ Full-scale environmental and social impact assessment

(2.2.3.3) Impacts considered

Select all that apply

☑ Direct impacts

☑ Indirect impacts

☑ Cumulative impacts

(2.2.3.4) Scope defined by

Select all that apply

☑ Company own standards and/or policies

(2.2.3.5) Aspects considered

Select all that apply

☑ Threatened species

☑ Protected habitats

☑ Critical habitats

☑ Natural habitats

☑ Ecosystem services

(2.2.3.6) Baseline biodiversity data available

Select from:

☑ Yes

(2.2.3.7) Environmental Impact Statement publicly available

Select from:

☑ Yes

(2.2.3.8) Please explain

NOVAGOLD has implemented a comprehensive environmental management approach at the Donlin Gold project, with a strong focus on biodiversity impacts, risks, and opportunities. The FEIS assessed effects on local and regional flora and fauna—including sensitive species—and considered long-term ecosystem changes driven by climate dynamics. Plans and permits include robust monitoring and mitigation measures to be implemented during construction and operations. In 2022, NOVAGOLD's Board adopted a formal Biodiversity Policy, developed with input from Alaska Native Corporation landowners. It guides our commitment to advancing the project while ensuring no net loss of biodiversity values and identifying opportunities to enhance ecological outcomes across the Y-K region. Donlin Gold LLC is equally committed to protecting the subsistence culture of nearby communities and respecting Alaska Native traditions. This is supported by detailed environmental plans covering safe drinking water, wastewater, stormwater, spill prevention, hazardous materials, wetlands, and wildlife interactions—ensuring protection of the environment and community health. A State-approved reclamation and closure plan ensures restoration of disturbed land to a stable condition, with revegetation goals, reduced water management needs, and measures for regrading and ecological stabilization. These efforts support both environmental resilience and long-term sustainability. Biodiversity is essential to life and cultural continuity in the region, particularly where fish and wildlife sustain local livelihoods. Guided by its Biodiversity Policy, NOVAGOLD integrates conservation into all activities to minimize harm and restore ecosystems. In 2024, Donlin Gold advanced its Aquatic Resources Monitoring Plan, gathering aquatic habitat data to inform future operations and enhance Crooked Creek habitat. Since 2023, NOVAGOLD, Donlin Gold, Calista, and TKC have collaborated on salmon monitoring. A 2024 pilot project on the George River—with the Native Village of Napaimute—tested juvenile salmon migration tracking, with expansion planned in 2025. Looking ahead, we continue working with regional stakeholders on biodiversity initiatives across the Kuskokwim watershed. In 2025, we will enhance our ESG disclosures in line with TCFD and GRI, and begin integrating TNFD elements to strengthen our approach to nature-related risks and sustainability.

[Add row]

(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

(2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed

Select from:

☑ Yes

(2.2.7.2) Description of how interconnections are assessed

The interconnectedness of environmental management at the Donlin Gold project is reflected in NOVAGOLD's comprehensive approach to responsible development, biodiversity protection, and climate resilience. The FEIS assessed potential impacts on local, regional, and sensitive species, incorporating long-term ecosystem changes driven by climate dynamics. This ensures biodiversity preservation efforts are aligned with climate adaptation strategies, anticipating and responding to shifting environmental conditions. Supporting these efforts, NOVAGOLD and Donlin Gold have implemented an extensive environmental baseline study program that addresses air and water quality, geotechnical conditions, land use, socioeconomics, public health, wetlands, vegetation, and wildlife. These studies, guided by regulatory frameworks and informed by Traditional Ecological Knowledge (TEK), continue to refine baseline data while accounting for potential project impacts and climate change effects. Dialogue with Alaska Native Corporations landowners, Calista and TKC, has been integral to the process, ensuring local insights shape the design and placement of infrastructure to minimize disruption to sensitive or culturally significant habitats. TEK has been a key component of environmental planning, contributing valuable perspective to ecosystem understanding and conservation. These collaborations support both the protection of the subsistence lifestyle and the integration of cultural values into project development. Environmental mitigation strategies are embedded in all phases of project planning, including a State-approved reclamation and closure plan that outlines stabilization, re-contouring, and revegetation of disturbed areas, along with long-term water management considerations. NOVAGOLD's Biodiversity Policy, adopted in 2022, formalizes its commitment to no net loss of biodiversity values and promotes enhancement opportunities across the Y-K region. Risk management processes further integrate climate-related risks under NEPA guidelines, reinforcing environmental compliance and resilience. Ongoing initiatives, including aquatic habitat restoration and salmon monitoring with local communities such as the Native Village of Napaimute, reflect NOVAGOLD's commitment to continuous improvement. A pilot program launched in 2024 to study juvenile salmon outmigration in the George River will expand in 2025, supporting data-driven biodiversity stewardship. These collective actions demonstrate a unified approach to sustainability that integrates science, cultural knowledge, regulatory rigor, and adaptive strategies to ensure long-term environmental and community benefit.
[Fixed row]

(2.3) Have you identified priority locations across your value chain?

(2.3.1) Identification of priority locations

Select from:

☑ Yes, we have identified priority locations

(2.3.2) Value chain stages where priority locations have been identified

Select all that apply

☑ Direct operations

(2.3.3) Types of priority locations identified

Sensitive locations

☑ Areas important for biodiversity

☑ Areas of limited water availability, flooding, and/or poor quality of water

(2.3.4) Description of process to identify priority locations

NOVAGOLDs initiatives, goals, and commitments play a crucial role in identifying priority locations at the Donlin Gold project and its surroundings. First by implementing a robust Biodiversity Policy, NOVAGOLD ensures thorough monitoring and conservation efforts in critical areas like the Crooked Creek watershed. This includes studying fish populations and habitat conditions vital for identifying areas needing preservation and restoration. Second, collaborative efforts with Alaska Native partners to monitor salmon fisheries across the region help prioritize locations where conservation efforts are most needed. This ensures the sustainability of resources crucial for local communities livelihoods. Third, integrating climate resilience into operational planning and striving for Net Zero Carbon Emissions by 2050 guides decisions on where to invest in sustainable practices. This proactive approach helps identify priority locations where environmental risks are most acute ensuring mitigation strategies are effectively implemented. Overall NOVAGOLDs integrated approach to biodiversity protection community engagement and climate resilience aids in identifying priority locations by focusing resources where they are most impactful for environmental conservation and community wellbeing.

(2.3.5) Will you be disclosing a list/spatial map of priority locations?

Select from:

☑ No, we do not have a list/geospatial map of priority locations

[Fixed row]

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

(2.4.6) Metrics considered in definition

Select all that apply

☑ Likelihood of effect occurring

(2.4.7) Application of definition

Traditionally this has been carried out in terms of consequence-level (measured in financial terms) and likelihood of occurrence, while at present, most of this is measured at the project-level rather than at the corporate level at present. Recent updates to the Risk Management process have included updating the prioritization to be based on 'anticipated difficulty / complexity to manage + impact' against the amount of action that is required. Risks are then categorized into 4 groups, with those that have the most substantive financial / strategic impact being priority one. With respect to climate change, the Company has focused on planning for full-scale operations, which is anticipated to be years into the future, to be as resilient as possible given the capital intensity of this asset and mine life longevity, while ensuring that the current activities are in line with the values that NOVAGOLD sees essential to uphold. Climate change based strategic decisions have therefore been incorporated primarily into longer-term full-scale operations planning.

Opportunities

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

(2.4.6) Metrics considered in definition

Select all that apply

☑ Likelihood of effect occurring

(2.4.7) Application of definition

NOVAGOLD defines substantive effects through a comprehensive commitment to responsible environmental management as outlined in its Environmental Policy This commitment includes communicating its dedication to environmental excellence to all stakeholders managing new activities to comply with laws and regulations or applying best practices in their absence remediating historical mining impacts collaboratively minimizing environmental releases and allocating resources for reclamation and environmental responsibilities. NOVAGOLD strives for continual improvement and transparency through regular progress reporting. Specifically, for the Donlin Gold project, NOVAGOLD will ensure rigorous management of mine-contacted water to prevent uncontrolled discharge. This will involve either utilizing the water in the milling process or treating and discharging it in accordance with strict permit standards. Oversight of ESG risks and strategy execution is led by senior management under the Boards supervision with on-the-ground implementation handled by site-based teams.
[Add row]

(2.5) Does your organization identify and classify potential water pollutants associated with its activities that could have a detrimental impact on water ecosystems or human health?

(2.5.1) Identification and classification of potential water pollutants

Select from:

☑ Yes, we identify and classify our potential water pollutants

(2.5.2) How potential water pollutants are identified and classified

All runoff from ongoing field activities, including drill sites, are carefully managed to comply with State of Alaska water quality permit requirements, ensuring protection of nearby streams and aquatic ecosystems. Authorization for all water withdrawals and usage is secured through appropriate state permits to safeguard local water resources. The project's domestic water supply is provided by groundwater wells, while sanitary wastewater from the camp is treated via a septic leach field system that safely recycles treated water back into the subsurface. As Donlin Gold remains a non-operational site, no industrial waste or wastewater was generated in 2024. As such, current septic wastewater and waste management activities present minimal environmental risk, reflecting responsible oversight in line with regulatory and environmental standards.
[Fixed row]

(2.5.1) Describe how your organization minimizes the adverse impacts of potential water pollutants on water ecosystems or human health associated with your activities.

Row 1

(2.5.1.1) Water pollutant category

Select from:

☑ Other physical pollutants

(2.5.1.2) Description of water pollutant and potential impacts

The pollution involves erosion that stems from historic placer mining activities which in turn can affect the fish habitat populations and overall water quality.

(2.5.1.3) Value chain stage

Select all that apply

☑ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

☑ Implementation of integrated solid waste management systems

☑ Other, please specify

(2.5.1.5) Please explain

Fish habitat restoration planning in the Crooked Creek watershed began in 2021 to address impacts from historic placer mining. Full-scale restoration started in 2022, aiming to enhance habitats for resident fish and coho salmon by restoring natural hydrology while preserving ponds created by past mining, which offer valuable aquatic habitat. By 2024, restored areas were opened to fish access, and early monitoring showed promising signs of habitat use and recovery. Restoration work also advanced at the historic Lyman family placer site, where significant stream and pond features were constructed to support aquatic life. In 2025, additional improvements are planned, including development of the Snow Gulch inlet channel to further expand habitat availability and ecosystem function. These efforts are guided by adaptive management and ongoing monitoring. Meanwhile, the camp continues to rely on groundwater wells for domestic use, with wastewater treated via a leach field and safely recycled to the subsurface. As the site remains non-operational, no industrial waste or wastewater is generated, and environmental risks remain minimal.
[Add row]

(2.6) By river basin, what number of active and inactive tailings dams are within your control?

Row 1

(2.6.1) Country/area & River basin

United States of America

☑ Kuskokwim River

(2.6.2) Number of tailings dams in operation

0

(2.6.3) Number of inactive tailings dams

0

(2.6.4) Comment

The Donlin Gold project is in the permitting and development stage and does not generate any tailings that require management and will not do so in the foreseeable future. No final construction decision has been made.
[Add row]

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.1.1) Environmental risks identified

Select from:

☑ Yes, both in direct operations and upstream/downstream value chain

Water

(3.1.1) Environmental risks identified

Select from:

☑ Yes, both in direct operations and upstream/downstream value chain

Plastics

(3.1.1) Environmental risks identified

Select from:

☑ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Other, please specify

(3.1.3) Please explain

NOVAGOLD does not consider plastics to be a significant environmental risk in its current predevelopment stage at the Donlin Gold project or within its upstream or downstream value chain. At this developmental stage the company is focused on geological studies feasibility assessments and regulatory compliance for potential future mining activities. This phase does not involve the handling or processing of plastics thereby minimizing any direct environmental impacts related to plastic waste. Additionally NOVAGOLD does not operate any producing mines at present so it is not engaged in largescale mining activities that could generate substantial plastic waste or contribute to plastic pollution. Once operations begin the focus will be on mineral extraction and processing which traditionally do not involve plastics. NOVAGOLD adheres to stringent environmental planning and regulatory standards throughout its project lifecycle. The company prioritizes stakeholder engagement collaborating with local communities indigenous groups regulators and environmental organizations to address concerns and integrate sustainable practices. By promoting responsible resource development and following regulatory frameworks. NOVAGOLD aims to minimize environmental impacts and maintain strong environmental stewardship. As such plastics are not currently identified as a priority risk or a relevant concern for the company.

Biodiversity

(3.1.1) Environmental risks identified

Select from:

☑ Yes, both in direct operations and upstream/downstream value chain

[Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Changes to regulation of existing products and services

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

The implementation of international agreements, or U.S. and Canadian federal, state, provincial, and local regulations mandating reductions in energy use, greenhouse gas emissions, or imposing carbon pricing mechanisms, may increase operational costs and affect the long-term viability or permitting of mining projects.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased indirect [operating] costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Likely

(3.1.1.14) Magnitude

Select from:

☑ High

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Mandatory reductions in energy consumption or greenhouse gas emissions, as well as the introduction of carbon pricing mechanisms under international agreements or North American regulations, could result in increased operational costs for the Donlin Gold project. These regulatory changes may have an impact on the project's financial performance, position, and cash flows over the medium term.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Compliance, monitoring and targets

☑ Greater compliance with regulatory requirements

(3.1.1.29) Description of response

Greater compliance with regulatory requirements can be an effective mitigation tool for managing the risk of changes in regulations related to products and services For the Donlin Gold project mandatory reductions in energy consumption greenhouse gas emissions or the introduction of emission pricing driven by international treaties or North American regulations could lead to increased operational costs These regulatory changes have the potential to impact the projects financial position performance and cash flows in the medium term By proactively adhering to existing and anticipated regulatory requirements the project can better manage these potential cost increases This includes integrating energy-efficient technologies implementing robust emission reduction strategies and staying informed about regulatory developments Compliance not only helps avoid penalties and disruptions but also positions the project to adapt more smoothly to regulatory changes thereby safeguarding its financial stability and operational efficiency

Water

(3.1.1.1) Risk identifier

Select from:

☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☑ Changing precipitation patterns and types (rain, hail, snow/ice)

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.7) River basin where the risk occurs

Select all that apply

☑ Kuskokwim River

(3.1.1.9) Organization-specific description of risk

Completion of the development of the Donlin Gold project depends on the timely availability of critical infrastructure, including power, water, transportation access, and associated facilities. Delays or the inability to secure these elements on commercially viable terms could impact the project's timeline and viability. In particular, the project relies on seasonal river transport for delivery of supplies. Physical climate risks—such as earlier freeze-up, delayed ice breakup, reduced flow levels, or low water depth in the Kuskokwim River due to shifting precipitation patterns—may hinder or prevent the timely transport of materials. Such disruptions could delay construction or operations, increase costs, and negatively impact the project's financial performance.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Other, please specify :Supply chain disruption

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Exceptionally unlikely

(3.1.1.14) Magnitude

Select from:

☑ Medium-low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The completion of the Donlin Gold project's development is contingent upon securing essential resources such as power water transportation access and facilities within specified timelines and terms Delays or challenges in securing these resources could potentially hinder or delay the project's progress. Uncertainties surrounding the timely construction and cost-effectiveness of critical infrastructure such as access roads and power supply may lead to increased capital expenditures and operational costs impacting the projects financial position Moreover adverse weather conditions affecting the Kuskokwim River such as delays in ice breakup or low water levels could disrupt the transportation of essential supplies needed for site operations These disruptions could lead to delays in construction activities which may increase costs and impact cash flow projections Additionally any interruptions or delays in project development could affect revenue generation timelines and profit margins This in turn could impact the financial performance of the project including potential adverse effects on returns for stakeholders and shareholders Overall these factors highlight the importance of comprehensive risk management strategies and contingency planning to mitigate potential impacts on financial position cash flow and overall project viability in the long term.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Engagement

☑ Engage with suppliers

(3.1.1.29) Description of response

For the Donlin Gold project, NOVAGOLD will ensure rigorous management of mine-contacted water to prevent uncontrolled discharge. This will involve either utilizing the water in the milling process or treating and discharging it in accordance with strict permit standards. As part of the commitment between Donlin Gold, Calista Corporation, and The Kuskokwim Corporation, the parties have established the Donlin Advisory Technical Review and Oversight Committee. This committee includes a community advisory committee and focuses on transportation and infrastructure in the region related to the Donlin Gold project. It addresses aspects such as barging activities, land and river transportation, and project-related infrastructure. Effective engagement with suppliers, coupled with meticulous planning, is essential for mitigating impacts. This careful planning includes assessing detailed alternative transport routes and delivery methods for key infrastructure. Additionally, continuous monitoring of local waterways and hydrological patterns will help ensure that potential environmental impacts are managed effectively.

Biodiversity

(3.1.1.1) Risk identifier

Select from:

☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☑ Threatened species in or near mining operation

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.8) Mining project ID

Select all that apply

☑ All disclosed mining projects

(3.1.1.9) Organization-specific description of risk

The FEIS for the Donlin Gold project highlights potential risks associated with the project's construction and operational activities. These activities could negatively impact local flora and fauna populations, including important and sensitive species, potentially disrupting local ecosystem dynamics. The FEIS also considers how climate change could influence these ecosystem dynamics over time. The project's operational plan and permits incorporate comprehensive biodiversity monitoring and mitigation strategies designed to effectively manage potential environmental impacts. In addition, a State of Alaska-approved reclamation and closure plan is in place to restore the land to its original condition following the completion of mining activities. While these measures are intended to minimize long-term effects, ongoing monitoring will help ensure their effectiveness and allow for adaptive management if necessary.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased indirect [operating] costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Unlikely

(3.1.1.14) Magnitude

Select from:

☑ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Managing risks to threatened species and water quality is crucial for NOVAGOLDs financial resilience Proactively addressing environmental concerns reduces the likelihood of costly legal disputes fines or project delays thereby preserving cash flow and enhancing investor confidence By demonstrating commitment to environmental stewardship and regulatory compliance NOVAGOLD strengthens its reputation and attractiveness to investors supporting sustained growth and profitability in the competitive mining sector

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Engagement

☑ Engage with local communities

(3.1.1.29) Description of response

NOVAGOLD collaborates closely with Native Corporations, Calista and TKC, to ensure comprehensive protection of biodiversity taking into account their deep knowledge of the regions ecological sensitivities This commitment is outlined in NOVAGOLDs Biodiversity Policy which aims to ensure no net loss of biodiversity values and even enhance these values across the Yukon-Kuskokwim YK region In 2024, as part of our ongoing commitment to protecting biodiversity, Donlin Gold continued to implement the Aquatic Resources Monitoring Plan (ARMP) by collecting aquatic species and habitat data, that will serve as a baseline to compare against in future years during mine operations. In addition, the Donlin Gold project has increased aquatic habitat in the Crooked Creek drainage to further enhance the surrounding ecosystem

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☑ Precipitation or hydrological variability

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

The Donlin Gold project is not directly threatened by current predictions of sea level rise as it is located inland at elevations from 100 meters to 450 meters above sea level. However changes in sea level could affect ocean and river transportation and shipping facilities which would be used to transport supplies equipment and personnel to the Donlin Gold project and products from the project to world markets. The Donlin Gold project proposes to deliver the vast majority of construction and operations equipment supplies consumables and other required materials to the project site via the Kuskokwim River when it is ice-free. Historically the Kuskokwim River has been ice-free from late April until mid-October and models based on historic weather and river flow records predict that there would be sufficient flow in the river to allow the transportation of the required materials to the project site annually. If climate changes and sea level rise alter the ice-free season or flow patterns of the Kuskokwim River the current supply logistics plan for the project may need to be modified.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased indirect [operating] costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Unknown

(3.1.1.14) Magnitude

Select from:

☑ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The Donlin Gold project is located inland at elevations from 100 meters to 450 meters above sea level and is not directly threatened by projected sea level rise However potential changes in sea level could impact ocean and river transportation crucial for supplying materials and transporting products to global markets Specifically alterations in the ice-free season or flow patterns of the Kuskokwim River historically used for transportation could necessitate adjustments to the projects supply logistics potentially affecting its financial position performance and cash flows in the medium term

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Policies and plans

☑ Develop flood emergency plans

(3.1.1.29) Description of response

Flood emergency plans as outlined in the Donlin Gold projects Emergency Response and Adaptive Management Plans are crucial tools for controlling the risks associated with flooding in the projects area. While the Donlin Gold project is not directly threatened by current sea level rise predictions due to its inland location at elevations ranging from 100 to 450 meters above sea level changes in sea level could still impact ocean and river transportation This transportation is essential for moving supplies equipment and personnel to the project site as well as for shipping products to global markets The project relies heavily on the Kuskokwim River for delivering the majority of its construction and operational materials during the ice-free period which historically spans from late April to mid-October. However if climate change or sea level rise affects the ice-free season or flow patterns of the river the current logistics plan may require modifications The flood emergency plans are designed to address such potential disruptions by providing a structured approach to manage and adapt to changing conditions These plans include strategies for monitoring river conditions adjusting logistics as needed and ensuring that supply chains remain resilient despite environmental changes By proactively implementing these plans the Donlin Gold project can effectively mitigate the risks of flooding and maintain operational continuity thus protecting its financial position and overall performance.

Water

(3.1.1.1) Risk identifier

Select from:

☑ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☑ Precipitation or hydrological variability

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.7) River basin where the risk occurs

Select all that apply

☑ Kuskokwim River

(3.1.1.9) Organization-specific description of risk

Climate change could affect the availability of water required to sustain operations at the Donlin Gold project Alaska is expected to become warmer and wetter due to changing precipitation patterns. This shift could result in either an excess of water on-site—requiring additional management—or a reduction in available water due to increased demand from surrounding communities. In either scenario, Donlin Gold may need to modify its water management plan, potentially leading to additional capital expenditures or increased operating costs. Effective water management remains a critical aspect of the project's operational planning.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased indirect [operating] costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Unlikely

(3.1.1.14) Magnitude

Select from:

☑ Low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Climate change induced fluctuations in water availability at the Donlin Gold project could have implications for its financial position performance and operational efficiency If there is excess water due to increased precipitation additional resources and infrastructure may be needed for water management potentially leading to higher operational costs and capital expenditures Conversely decreased water availability possibly caused by heightened local community demand could necessitate costly modifications to the projects water management systems to ensure sufficient supply for operations further impacting financial resources Moreover uncertainties in water availability could disrupt production schedules and operational continuity potentially leading to delays in construction timelines or interruptions in mining activities These disruptions can impact revenue generation and profitability projections affecting the overall financial performance of the project Additionally regulatory compliance related to water usage under changing climate conditions may introduce additional costs and administrative complexities Strategically managing these water-related risks through adaptive planning and resilient infrastructure investments will be crucial for mitigating potential impacts on the Donlin Gold projects financial stability operational efficiency and long-term sustainability in the medium term.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Policies and plans

☑ Other policies or plans, please specify :Improve Monitoring

(3.1.1.29) Description of response

Improved monitoring will allow Donlin Gold to properly assess and integrate other responses such as further maximizing water reuse optimizing storage and using sources such as deep groundwater that are plentiful in the area Given its early stage Donlin Gold has the ability to implement this from the very beginning hence the magnitude of impact is low as actions have already been taken to control the risks associated with variability in hydrologic conditions beyond those previously observed.

Water

(3.1.1.1) Risk identifier

Select from:

☑ Risk5

(3.1.1.3) Risk types and primary environmental risk driver

Reputation

☑ Increased partner and stakeholder concern or negative partner and stakeholder feedback

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.7) River basin where the risk occurs

Select all that apply

☑ Kuskokwim River

(3.1.1.9) Organization-specific description of risk

Because the project is anticipated to require perpetual water treatment after closure the perception of potential risk from external stakeholders to water quality exists long term which could lead to opposition towards the project.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Loss of license to operate

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Unlikely

(3.1.1.14) Magnitude

Select from:

☑ Low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The need for perpetual water treatment after closure of the project creates a persistent perception of potential risk to water quality which could fuel opposition to the project. This ongoing environmental concern may lead to prolonged regulatory scrutiny increased compliance costs and delays in obtaining necessary permits. Negative public perception regarding long-term environmental impacts could also affect stakeholder confidence and social license to operate potentially impacting investor sentiment and access to capital. These factors collectively pose risks to the financial position performance and cash flows of the future mining operation in the medium term Implementing rigorous environmental safeguards transparent monitoring practices and proactive stakeholder engagement strategies will be crucial to addressing these concerns and securing sustainable operational outcomes.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Compliance, monitoring and targets

☑ Other compliance, monitoring or target, please specify :Continue to comply with local regulatory requirements

(3.1.1.29) Description of response

Strong long-term water management planning has and will continue to occur to ensure that all resources including financial assurance are available to meet all of the requirements for the mine closure and post-closure periods.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk8

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☑ Wildfires

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

Due to the remote area with dense vegetation increases in temperature extreme storms and drought may increase the likelihood of wildfires. This could increase fire dangers including smoke inhalation fire damage to local homes and the project itself and create unsafe working conditions due to poor air quality. Unplanned closures would decrease production and profits including those shared with the Alaska Native Corporations. Proper forestry management involves implementing strategies such as controlled burns clearing excess vegetation and creating firebreaks to reduce the fuel available for wildfires. These measures help mitigate fire dangers by decreasing the likelihood of uncontrolled wildfires thereby protecting local homes the operation itself and maintaining safe working conditions.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Likely

(3.1.1.14) Magnitude

Select from:

☑ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The remote location with dense vegetation makes the future mining operation susceptible to increased wildfire risks due to rising temperatures extreme storms and drought conditions, This heightened threat could lead to more frequent and severe wildfires posing risks such as smoke inhalation fire damage to local infrastructure including homes and the mine site and unsafe working conditions due to compromised air quality. Unforeseen closures resulting from wildfires could disrupt production schedules impacting profitability and affecting revenue shared with Native Corporation landowners. These factors could collectively impact the financial position performance and cash flows of the operation in the medium term emphasizing the need for robust risk management and contingency planning to mitigate these potential impacts. Proper forestry management involves implementing strategies such as controlled burns clearing excess vegetation and creating firebreaks to reduce the fuel available for wildfires These measures help mitigate fire dangers by decreasing the likelihood of uncontrolled wildfires thereby protecting local homes the operation itself and maintaining safe working conditions.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Nature based solutions, restoration and conservation

☑ Other nature-based solution, restoration and conservation, please specify :Forestry Management

(3.1.1.29) Description of response

In the remote project area where dense vegetation and environmental factors like increased temperatures extreme storms and drought conditions elevate the risk of wildfires effective forestry management can be a crucial response Proper forestry management involves implementing strategies such as controlled burns clearing excess vegetation and creating firebreaks to reduce the fuel available for wildfires These measures help mitigate fire dangers by decreasing the likelihood of uncontrolled wildfires thereby protecting local homes the project itself and maintaining safe working conditions.

Biodiversity

(3.1.1.1) Risk identifier

Select from:

☑ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☑ Water stress

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.8) Mining project ID

Select all that apply

☑ All disclosed mining projects

(3.1.1.9) Organization-specific description of risk

The FEIS for the Donlin Gold project assessed potential impacts on water quality in the project area, including local water bodies and downstream ecosystems. There is a possibility that the project's construction and operational activities could negatively affect water quality and aquatic habitats. Although the project's operational plan and permits include extensive water quality monitoring and mitigation measures designed to protect these resources and ensure regulatory compliance, there remains a risk that these measures may not fully prevent adverse effects. Additionally, while a reclamation and closure plan approved by the State of Alaska outlines steps to restore water quality and hydrological conditions after mining, there is potential for long-term impacts on water resources despite these efforts.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Unlikely

(3.1.1.14) Magnitude

Select from:

☑ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

While the Donlin Gold project has implemented comprehensive measures to monitor and mitigate risks to water quality any adverse impacts could potentially affect NOVAGOLDs financial performance in several ways Regulatory noncompliance or significant environmental incidents related to water quality could lead to fines penalties or legal liabilities impacting operational costs and cash flows Moreover negative perceptions or concerns regarding water quality management could affect stakeholder confidence potentially impacting investor sentiment and access to capital Ensuring effective implementation of water quality management measures is therefore crucial to mitigating these risks and maintaining the projects operational and financial integrity.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Engagement

☑ Engage with River Basin Organizations

(3.1.1.29) Description of response

Since 2021 Donlin Gold has been planning and implementing a fish habitat restoration project in the Crooked Creek watershed focusing on areas historically impacted by placer mining activities In 2023, efforts focused on identifying opportunities to monitor, evaluate, and support salmon populations. One key initiative undertaken in 2024 was the launch of a pilot project on the George River, a Kuskokwim River tributary located approximately 24 kilometers east of the village of Crooked Creek. The aim of this program was to test methods to monitor salmon smolt outmigration. In collaboration with the Native Village of Napaimute, fish traps and equipment were delivered to and installed in the George River to support this important research. The program will continue into 2025 when the study will expand to cover the full juvenile salmon migration season. The work will begin in mid- to late-April after river break-up with the mobilization of Donlin Gold, contractors, and Napaimute residents to collect smolt outmigration data over an approximately two-month period through late June. Looking ahead, NOVAGOLD and Donlin Gold are also collaborating with regional stakeholders on additional biodiversity-focused projects, both near the project site and throughout the broader Kuskokwim River watershed.

Water

(3.1.1.1) Risk identifier

Select from:

☑ Risk4

(3.1.1.3) Risk types and primary environmental risk driver

Reputation

☑ Increased partner and stakeholder concern or negative partner and stakeholder feedback

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.7) River basin where the risk occurs

Select all that apply

☑ Kuskokwim River

(3.1.1.9) Organization-specific description of risk

As awareness grows about unresolved mine closures in the region—primarily related to historic placer mining activities not conducted by NOVAGOLD or Donlin Gold—there is potential risk the company could face scrutiny of over its own performance. This could lead to concerns about the possibility of water contamination and negative impacts on fisheries. Such issues might damage the company's reputation and influence its ability to secure and maintain the social license to operate.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Loss of license to operate

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Very likely

(3.1.1.14) Magnitude

Select from:

☑ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

As public awareness grows regarding past unresolved mine closures in the region—primarily related to historic placer mining activities not conducted by NOVAGOLD or Donlin Gold, the company faces heightened scrutiny and perceived risks associated with potential water contamination and impacts on fisheries. This perception even without evidence of current operational issues could damage the company's reputation and undermine its ability to secure and retain social license to operate

The resulting regulatory challenges and community opposition may lead to increased compliance costs operational disruptions and delays in project approvals These factors collectively pose risks to the financial position performance and cash flows of the future mining operation in the medium term Proactive engagement with stakeholders transparent communication and robust environmental management practices are essential to mitigating these risks and sustaining long-term operational viability.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Engagement

☑ Engage with local communities

(3.1.1.29) Description of response

Donlin Gold complies with all applicable permit requirements—many of which were not in place during the era of historical mining—and is committed to responsible development that safeguards the environment and supports Alaska Native communities. While outdated perceptions link mining to pollution, today's operations are governed by rigorous environmental standards that, when properly complied with, significantly mitigate such risks. For more than two decades, Donlin Gold has partnered with Calista, which owns the subsurface mineral rights, and TKC, which holds the surface land rights, through life-of-mine agreements that prioritize responsible mining and community benefits. In collaboration with both ANCSA corporations, Donlin Gold invests in local communities by supporting infrastructure development, education, healthcare, cultural preservation, and regional economic growth. This includes preferential contracting, scholarships, and employment opportunities for Calista and TKC shareholders, as well as support for TKC's energy and infrastructure initiatives in Middle Kuskokwim villages. These efforts are central to Donlin Gold's approach to sustainable and inclusive project development. NOVAGOLD believes that responsible mining is best achieved through strong partnerships with local communities, whose knowledge and involvement help reduce environmental impact and ensure lasting, shared value.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk4

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☑ Heavy precipitation (rain, hail, snow/ice)

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

Extreme weather events such as increased frequency or intensity of storms increased snowpack or most likely blizzards or extended periods of extreme cold have the potential to disrupt operations. Where appropriate the Donlin Gold project has developed contingency plans for managing extreme weather conditions however extended disruptions to site access and supply lines due to extreme weather could result in interruption of activities at the project site delay or increase the cost of construction of the project or otherwise adversely affect our business. In extreme instances the operation may have to pause which would have a cost to the business.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased indirect [operating] costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Likely

(3.1.1.14) Magnitude

Select from:

☑ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Extreme weather events such as more frequent or severe storms increased snowpack or extended periods of extreme cold could significantly impact the financial position performance and cash flows of the Donlin Gold project in several ways Operational disruptions due to weather-related site access issues or supply line interruptions could lead to delays in construction timelines potentially increasing project costs These delays may also postpone revenue generation impacting cash flows and overall financial performance The need to implement contingency plans or pause operations during severe weather could incur additional expenses further straining financial resources Additionally prolonged weather-related interruptions could affect investor confidence and stakeholder perceptions potentially influencing access to capital and the projects long-term financial sustainability.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Policies and plans

☑ Develop flood emergency plans

(3.1.1.29) Description of response

Extreme weather events—such as increased frequency or intensity of storms, increased snowpack, blizzards, or extended periods of extreme cold—have the potential to disrupt operations at the Donlin Gold project. These conditions can impact access, construction schedules, equipment functionality, and pose risks to worker safety. Developing comprehensive flood emergency plans is crucial for mitigating the risks associated with heavy precipitation such as rain, hail, snow, and ice. Donlin Gold has implemented robust flood mitigation strategies, including detailed emergency response plans and adaptive management measures. These strategies feature flood control infrastructure like retention basins and diversion channels to manage excess water effectively. Regular monitoring of weather patterns and river flow helps anticipate and prepare for potential flood and severe weather risks. By integrating these measures, Donlin Gold can swiftly respond to adverse weather conditions, minimize damage to infrastructure, and ensure operational continuity—thereby protecting both the project site and surrounding areas.

Water

(3.1.1.1) Risk identifier

Select from:

☑ Risk3

(3.1.1.3) Risk types and primary environmental risk driver

Market

☑ Other market risk, please specify :Increased stakeholder concern or negative stakeholder feedback

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.7) River basin where the risk occurs

Select all that apply

☑ Kuskokwim River

(3.1.1.9) Organization-specific description of risk

As a result of any environmental event such as an uncontrolled discharge to a waterway whether or not these events may have true environmental impacts or not there is the potential for environmental events to result in the perception that the company is unreliable and unable to protect the environment leading to a loss in license to operate. These events may also enhance the activities of anti-mining NGOs at local regional national and/or international scale.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Loss of license to operate

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Unlikely

(3.1.1.14) Magnitude

Select from:

☑ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Environmental events such as uncontrolled discharges to waterways pose risks to the financial position performance and cash flows of a future mining operation in the medium term Even if these events do not cause significant environmental harm they can create a perception of environmental irresponsibility potentially jeopardizing the company's license to operate This perception could undermine stakeholder trust and lead to regulatory scrutiny increasing compliance costs and operational challenges Moreover such incidents may amplify opposition from anti mining NGOs at various local and international levels influencing public opinion and regulatory decisions Addressing these risks through robust environmental management practices and proactive stakeholder engagement is crucial to safeguarding the projects financial stability and operational continuity in the medium term.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Compliance, monitoring and targets

☑ Other compliance, monitoring or target, please specify :Increased awareness and training of spill response plan

(3.1.1.29) Description of response

In addition to ensuring best practices at the site level, environmental training will be provided to all personnel involved in the construction of the project once that phase begins. This training includes environmental awareness, spill prevention, and spill response as appropriate. Donlin Gold follows strict internal procedures to ensure the proper design and operation of all water supply management, treatment, and discharge systems. Furthermore, Donlin Gold is committed to adhering to all regulatory requirements as prescribed by the permits.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk3

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☑ Other chronic physical risk, please specify :Water Scarcity

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

Climate change could induce drought throughout the area which could impact barging and the amount of water available to sustain operations at the future full-scale. Donlin Gold project Prolonged drought could lower water levels including that of the Kuskokwim River of which a 300- mile stretch is critical to our supply chain. The Donlin Gold project proposes to deliver the vast majority of construction and operations equipment supplies consumables and other required materials to the project site via the Kuskokwim River If drought alters the flow patterns of the Kuskokwim River the current supply logistics plan for the project may need to be modified In addition to management of barging logistics in this instance management of water is an essential component of the projects operating plans. Climate change could require modifications to the projects water management plan which may require additional capital investments or increase operating costs if precipitation increases relative to historic records.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased indirect [operating] costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ About as likely as not

(3.1.1.14) Magnitude

Select from:

☑ Medium-high

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Climate change-induced drought in the area surrounding the future full-scale Donlin Gold project could significantly impact its financial position and performance Reduced water levels along the critical 300 mile stretch of the Kuskokwim River vital for transporting construction and operational supplies may necessitate costly adaptations to logistics and water management plans These adjustments could lead to increased operational expenses and require substantial capital investments Furthermore potential disruptions to supply chains and production schedules due to water scarcity could delay operations and revenue generation affecting overall profitability Compliance with evolving environmental regulations related to water usage and management under changing climate conditions could also add to

operational costs and administrative complexities Moreover investor and stakeholder perceptions of the projects environmental resilience and management practices in response to climate impacts could impact its reputation and access to capital influencing long-term financial sustainability.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Adopt water efficiency, water reuse, recycling and conservation practices

(3.1.1.29) Description of response

Adopting water efficiency reuse recycling and conservation practices is crucial for mitigating water scarcity risks at the Donlin Gold project site The project aims to optimize water use through advanced ore processing techniques that minimize water demand Water reuse systems are being designed to capture and treat process water for multiple operational stages thereby reducing the need for external sources Recycling initiatives will treat and repurpose water from tailings and mining processes to make it suitable for reuse conserving water and mitigating local pollution Conservation practices focus on preventing water waste through efficient infrastructure and careful monitoring NOVAGOLDs commitment to effective water management is evident in its comprehensive water management plans which emphasize both operational efficiency and environmental protection Regular monitoring and reporting ensure transparency and compliance with regulations further enhancing water management practices By integrating these strategies Donlin Gold aims to ensure sustainable operations and protect local water resources securing the projects long-term viability.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk6

(3.1.1.3) Risk types and primary environmental risk driver

Market

☑ Other market risk, please specify :Contractors unavailable

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

As a result of the minerals and metals sector moving into a boom phase as raw materials are required for the energy transition coupled with uncertainty regarding the timing of the Donlin Gold project there is the potential for the desired contractors. A-teams not being available to design build, manage, and start up the Donlin Gold project resulting in delays and increase in CAPEX.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased capital expenditures

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Very likely

(3.1.1.14) Magnitude

Select from:

☑ Medium-high

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Due to the minerals and metals sector entering a boom phase driven by raw materials demand for the energy transition coupled with uncertainty surrounding the timing of the Donlin Gold project there is a risk that toptier contractors A-teams may not be available for design construction project management and startup phases This potential unavailability could lead to delays necessitate increased capital expenditures CAPEX.These factors may adversely impact the financial position performance and cash flows of the project in the medium term highlighting the importance of strategic planning and risk mitigation in project execution.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Diversification

☑ Increase supplier diversification

(3.1.1.29) Description of response

Increasing supplier diversification is a crucial strategy for mitigating the risk of unavailable contractors at the Donlin Gold project site in Alaska. To ensure operational continuity and avoid delays NOVAGOLD and Donlin Gold have adopted a diversification approach expanding their pool of suppliers and contractors This involves engaging a variety of local and regional contractors and suppliers reducing reliance on any single source. The project emphasizes building robust relationships with multiple suppliers for critical materials and services and establishing long-term agreements to stabilize procurement channels This strategy helps in managing supply chain disruptions and ensuring a steady flow of resources ultimately supporting uninterrupted operations and enhancing the projects resilience against potential contractor unavailability.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk7

(3.1.1.3) Risk types and primary environmental risk driver

Market

☑ Other market risk, please specify :Increased cost of raw materials

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

Rising global costs for construction materials, fuel, and other inputs, coupled with potential climate change impacts, pose significant risks to the project. Extreme weather and changing climate conditions could disrupt material availability and transportation, leading to higher costs and logistical challenges. This may cause delays and escalate project expenses, potentially straining the project's balance sheet and jeopardizing its timely execution and overall viability.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ About as likely as not

(3.1.1.14) Magnitude

Select from:

☑ Medium-low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Continued expenditure and rising global costs of construction materials fuel and related expenses may strain the ability to maintain a robust balance sheet needed to execute planned activities for a future mining operation in the medium term This financial pressure could potentially lead to project delays or even prevent it from proceeding as planned Climate change particularly its impact on the availability and transportation of these critical materials further exacerbates these challenges These factors collectively pose risks to the financial position performance and cash flows of the project underscoring the importance of effective cost management and adaptive strategies in mitigating these risks over time.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Compliance, monitoring and targets

☑ Promotion of best practice and awareness in the value chain

(3.1.1.29) Description of response

Promoting best practices and increasing awareness throughout the value chain are key strategies for mitigating the risk of rising raw material costs for the Donlin Gold project. In collaboration with Donlin Gold LLC, NOVAGOLD supports these efforts through the implementation of efficient resource management and sustainable procurement practices that help control costs and enhance operational efficiency. This includes optimizing inventory management, leveraging advanced technologies, and ensuring that suppliers meet high standards of sustainability and performance. By fostering strong supplier partnerships and maintaining a focus on continuous improvement, NOVAGOLD—working closely with Donlin Gold LLC—not only helps manage cost fluctuations but also strengthens supply chain resilience, ultimately reducing the impact of raw material cost increases on the project.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk5

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☑ Permafrost thawing

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

Given the location of our site in Alaska melting permafrost could affect water management due to changes to the hydrology and this could further impact geotechnical stability. This could in turn present design and operational challenges for both infrastructure mine design and waste storage potentially increasing design and redesign costs and increasing operating costs where dewatering is required.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased indirect [operating] costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Likely

(3.1.1.14) Magnitude

Select from:

☑ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Melting permafrost in Alaska affecting water management and altering hydrology poses significant risks to the financial position cash flow and overall performance of a future mining operation in several ways Changes in hydrology can destabilize geotechnical conditions necessitating costly adjustments in infrastructure design mine layouts and waste storage solutions These modifications can lead to increased initial and redesign expenses impacting capital expenditure budgets and financial planning Operational costs may escalate due to the need for dewatering measures further straining cash flow management Moreover delays or interruptions in construction and operational phases due to these challenges can delay revenue generation affecting profitability and the ability to meet financial obligations Addressing these environmental impacts proactively is crucial to minimizing disruptions and maintaining long-term financial stability in mining operations.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Establish and improve end-of-life infrastructure and/or technology

(3.1.1.29) Description of response

Establishing and enhancing end-of-life infrastructure and technology is crucial for mitigating the risk of permafrost thawing at the Donlin Gold project site Given the projects location in a permafrost region NOVAGOLD and Donlin Gold have implemented several strategies to manage permafrost stability effectively This includes designing infrastructure with thermal insulation and cooling technologies to minimize the impact on permafrost and employing advanced geotechnical methods for ongoing monitoring and maintenance During the end-of-life phase careful planning is essential to ensure that decommissioning and reclamation processes do not disturb permafrost This involves removing or repurposing infrastructure in ways that prevent additional thawing and applying passive cooling techniques to maintain ground stability NOVAGOLDs proactive approach integrates these permafrost management strategies with detailed planning for site closure and reclamation including regular ground condition monitoring and adaptive management practices By incorporating these measures the project aims to mitigate permafrost thawing risks ensuring long-term environmental stability and regulatory compliance.
[Add row]

(3.2) Within each river basin, how many facilities are exposed to substantive effects of water-related risks, and what percentage of your total number of facilities does this represent?

Row 1

(3.2.1) Country/Area & River basin

United States of America
☑ Kuskokwim River

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply
☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:
☑ 26-50%

(3.2.7) Production value for the metals and mining activities associated with these facilities (currency)

0

(3.2.10) % organization's total global revenue that could be affected

Select from:
☑ Unknown

(3.2.11) Please explain

Only the Donlin Gold project is considered to be at risk of water related threats and throughout this questionnaire. NOVAGOLD considers this to constitute 33% of company facilities with the NOVAGOLD Vancouver office counting as another 33% and the NOVAGOLD Salt Lake City office the final 33%. The Donlin Gold project is located in a remote part of Western Alaska where there are few other water users and water scarcity has not been a concern to date. The company believes that through a rigorous and science based input and review process prior to issuance of the FEIS the water security risks have been addressed. As part of its permit maintenance and in response to stakeholder input the company will continue to assess all risks including water security Given the requirements of water use at site it is imperative that risks remain carefully monitored and controlled as any loss of access would lead to declining production. This year NOVAGOLD began monitoring our low levels of office water use though we do not believe we are exposed to financially material water risks.
[Add row]

(3.3) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

	Water-related regulatory violations	Comment
	Select from: ☑ No	*Not subject to any fines, enforcement orders or penalties.*

[Fixed row]

(3.4) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for violation of biodiversity-related regulation?

	Any penalties for violation of biodiversity-related regulation?	Comment
	Select from: ☑ No	*Not subject to any fines, enforcement orders or penalties.*

[Fixed row]

(3.5) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

Select from:

☑ No, and we do not anticipate being regulated in the next three years

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

	Environmental opportunities identified
Climate change	*Select from:* ☑ Yes, we have identified opportunities, and some/all are being realized
Water	*Select from:* ☑ Yes, we have identified opportunities, and some/all are being realized
Biodiversity	*Select from:*

	Environmental opportunities identified
	☑ Yes, we have identified opportunities, and some/all are being realized

[Fixed row]

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

☑ Shift in consumer preferences

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ United States of America

(3.6.1.8) Organization specific description

Amid growing climate-related risks and economic uncertainty, gold continues to be viewed by investors as a reliable store of value and a hedge against market volatility. As climate change increasingly influences global financial systems—through physical risks, policy shifts, and market disruptions—investor behavior may shift in response. This could lead to heightened demand for gold during periods of instability, potentially driving up its price. As such, climate-related uncertainty may present an opportunity for the gold sector, reinforcing gold's role as a strategic asset in diversified investment portfolios.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Likely (66–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

N/A

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ No

(3.6.1.26) Strategy to realize opportunity

N/A

Water

(3.6.1.1) Opportunity identifier

Select from:
☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resilience
☑ Increased resilience to impacts of climate change

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:
☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply
☑ United States of America

(3.6.1.6) River basin where the opportunity occurs

Select all that apply
☑ Kuskokwim River

(3.6.1.8) Organization specific description

The potential environmental effects of the proposed Donlin Gold project were detailed and evaluated as part of the National Environmental Policy Act process The FEIS was issued in August 2018 and not only includes the potential effects of the project on climate change but also the potential effects of climate change on the project itself these risks are considered and have been incorporated into the project design increasing the resilience of the project and making it especially resilient in comparison to competing mines and projects. The effects of climate change including the impacts of extreme weather conditions and melting permafrost are incorporated into all permitting submissions as well as design engineering and operational and closure planning

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ About as likely as not (33–66%)

(3.6.1.12) Magnitude

Select from:

☑ Medium-low

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

N/A

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ No

(3.6.1.26) Strategy to realize opportunity

N/A

Biodiversity

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Markets

☑ Other markets opportunity, please specify :Increased collaboration on regional mitigation efforts

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ United States of America

(3.6.1.7) Mining project ID

Select all that apply

☑ All disclosed mining projects

(3.6.1.8) Organization specific description

There could be physical impacts of climate change on local ecosystems, which are important to stakeholders. This presents a risk that the Company may be expected to take responsibility for natural changes beyond its control; however, it also presents an opportunity to collaborate on regional mitigation efforts – building on our involvement in fisheries dialogue and related initiatives throughout the region – and to support stakeholder confidence even when such changes are not directly linked to Company operations.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Likely (66–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

N/A

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ No

(3.6.1.26) Strategy to realize opportunity

N/A

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

☑ Increased efficiency of production and/or distribution processes

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ United States of America

(3.6.1.8) Organization specific description

As a result of selected improvements to design construction operation closure or post closure the design for the operation may be optimized for community and reputational benefits resulting in the project being defined in a way that demonstrates provision of direct community benefits providing responses to community concerns about long term risks and can be shown to reduce risks to the environment thereby improving the opportunity to obtain and retain the social license.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Reduced direct costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ About as likely as not (33–66%)

(3.6.1.12) Magnitude

Select from:

☑ Medium

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

N/A

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ No

(3.6.1.26) Strategy to realize opportunity

N/A

Water

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Markets

☑ Other markets opportunity, please specify :Improved community relations

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ United States of America

(3.6.1.6) River basin where the opportunity occurs

Select all that apply

☑ Kuskokwim River

(3.6.1.8) Organization specific description

In the case of selected and innovative possible design modifications for closure and post closure the project can be designed to reduce the risk of potential damage to the environment and to water quality enhancing the company reputation and improving the potential for obtaining and maintaining the social license to operate especially where these designs are developed in collaboration with local Alaska Native Corporations and other regional stakeholders.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ More likely than not (50–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium-low

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

n/A

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ No

(3.6.1.26) Strategy to realize opportunity

N/A
[Add row]

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

Select from:

☑ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☑ Quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

☑ Executive directors or equivalent

☑ Non-executive directors or equivalent

☑ Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

☑ Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

This policy provides a framework for fostering inclusion and promoting diversity within the Board of NOVAGOLD. The Board recognizes that diversity of background, experience, and thought not only brings significant business benefits but also reflects our broader commitment to creating a workplace where all individuals are respected, supported, and empowered. Diversity, equity, and inclusion are central to sound governance and prudent decision-making. A Board composed of individuals with varied skills, experiences, perspectives, and backgrounds enhances our ability to identify opportunities, understand risks, and oversee the organization effectively. It fosters richer dialogue, better decision-making, and a stronger capacity for oversight. For the purposes of Board composition, diversity

includes, but is not limited to, industry experience, functional expertise, gender, ethnicity, and age. Board appointments are made on merit and aligned with the skills, independence, and knowledge required for the Board to be effective, while reflecting the diverse and inclusive culture we strive to cultivate across the organization. As part of our broader ESG strategy and Code of Business Conduct and Ethics, the Board is committed to maintaining a merit-based selection process that prioritizes inclusion and gender diversity, and will continue to act with intention to promote meaningful progress.

(4.1.6) Attach the policy (optional)

Board-Diversity-Equity-Inclusion-Policy.pdf
[Fixed row]

(4.1.1) Is there board-level oversight of environmental issues within your organization?

	Board-level oversight of this environmental issue
Climate change	*Select from:* ☑ Yes
Water	*Select from:* ☑ Yes
Biodiversity	*Select from:* ☑ Yes

[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Chief Executive Officer (CEO)

☑ Board-level committee

☑ President

☑ General Counsel

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Other policy applicable to the board, please specify :Climate Change Policy, Sustainability Committee Charter and Environmental Policy

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Reviewing and guiding annual budgets

☑ Overseeing and guiding scenario analysis

☑ Overseeing the setting of corporate targets

☑ Approving corporate policies and/or commitments

☑ Overseeing reporting, audit, and verification processes

☑ Monitoring the implementation of a climate transition plan

☑ Overseeing and guiding the development of a business strategy

☑ Monitoring compliance with corporate policies and/or commitments

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

Climate change related issues are addressed in detail at quarterly Sustainability Committee meetings as well as reviewed at all regular Board meetings. All reviews and recommendations are sent to the full Board for review and approval including approval of all annual ESG issues including climate-related goals. The company establishes rigorous annual goals and discloses details of levels of achievement for the goals of the previous year and for the upcoming year in the Management Information Circular. The executive team and the board work together to set long-term strategic company goals and short-term annual goals. The assessment of performance against these goals is monitored regularly during the year by the Board. At the end of each year the Compensation Committee leads the annual review of company goalsetting and performance executive performance evaluations and setting of the executive and director compensation programs as well as provides recommendations on those topics to the Board for its consideration. While the Board is ultimately responsible for oversight of the company's ESG performance the Sustainability Committee reviews the company's environmental and social engagement performance at every committee meeting and provides strategic direction to management on these matters. The Sustainability Committee provides a report at each regular board meeting. The Sustainability Committee and Board each meet a minimum of four times per year.

Water

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Chief Executive Officer (CEO)

☑ Board-level committee

☑ President

☑ General Counsel

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Other policy applicable to the board, please specify :Sustainability Committee Charter

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Sporadic – agenda item as important matters arise

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Reviewing and guiding annual budgets

☑ Approving corporate policies and/or commitments

☑ Overseeing and guiding major capital expenditures

☑ Monitoring the implementation of the business strategy

☑ Overseeing reporting, audit, and verification processes

☑ Overseeing and guiding the development of a business strategy

☑ Overseeing and guiding acquisitions, mergers, and divestitures

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

At NOVAGOLD the highest management-level position with responsibility for sustainability (inclusive of climate change and nature) matters is the Company's executive management team who provide at least quarterly updates to the Sustainability Committee who provide broader oversight. At the Donlin Gold project level there is a permitting and environmental manager who works closely with Donlin Gold LLC. Updates are also provided indirectly through the Donlin Gold Board's Technical Committee that is responsible for overseeing design and operation of the Donlin Gold project.

Biodiversity

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Chief Executive Officer (CEO)

☑ Board-level committee

☑ President

☑ General Counsel

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Other policy applicable to the board, please specify :Biodiversity Policy

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Reviewing and guiding annual budgets

☑ Overseeing the setting of corporate targets

☑ Monitoring progress towards corporate targets

☑ Approving corporate policies and/or commitments

☑ Overseeing and guiding major capital expenditures

☑ Monitoring the implementation of the business strategy

☑ Overseeing reporting, audit, and verification processes

☑ Overseeing and guiding the development of a business strategy

☑ Monitoring compliance with corporate policies and/or commitments

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

NOVAGOLD acknowledges the critical importance of biodiversity preservation particularly in Western Alaska where our operations are located. In 2022 the Board of Directors initiated the development of NOVAGOLD's Biodiversity Policy to outline our commitment to managing and mitigating potential impacts on biodiversity and ecosystem services across all operational sites. The Biodiversity Policy represents NOVAGOLD's comprehensive approach to biodiversity conservation integrating biodiversity considerations into all aspects of our operations Responsibility for implementing the Policy rests with NOVAGOLD's executive management team who reports directly to the President Chief Executive Officer and the Sustainability Committee. This committee oversees the company's biodiversity performance ensuring

alignment with strategic goals and financial planning. Quarterly meetings of the Sustainability Committee focus on Environmental Social and Governance ESG issues including biodiversity and provide regular reports to the Board Also in 2024, under the ARMP, NOVAGOLD re-initiated its baseline aquatic monitoring program in the Crooked Creek watershed around the project site, which included comprehensive studies of salmon and other fish populations, macroinvertebrates, and periphyton. Quarterly water sampling was conducted in March, May, September, and October 2024; biomonitoring work was not completed in July due to very high flows. Additionally, sampling efforts were performed toward further characterizing sediment and fish tissue quality to establish pre-mining conditions. Moving forward, Donlin Gold is developing plans for additional monitoring under the ARMP, which will build upon the data collected for over two decades. NOVAGOLD and Donlin Gold collaborate closely with Alaska Native Corporations to integrate traditional ecological knowledge into biodiversity protection efforts. This collaboration ensures that our initiatives respect and incorporate local perspectives and priorities NOVAGOLD is committed to continual improvement in biodiversity management Performance against the commitments outlined in the Biodiversity Policy is regularly monitored and reported to the Board. This process includes tracking environmental risks and adjusting strategies to enhance biodiversity conservation efforts. NOVAGOLDs Biodiversity Policy exemplifies our proactive approach to biodiversity conservation reflecting our commitment to sustainable mining practices in Western Alaska.
[Fixed row]

(4.2) Does your organization's board have competency on environmental issues?

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:
☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply
☑ Consulting regularly with an internal, permanent, subject-expert working group
☑ Engaging regularly with external stakeholders and experts on environmental issues
☑ Integrating knowledge of environmental issues into board nominating process
☑ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Academic
☑ Postgraduate education (e.g., MSc/MA/PhD in environment and sustainability, climate science, environmental science, water resources management,

forestry, etc.), please specify :Dr. Dorward-King holds a bachelor's degree from Maryville College and received a PhD in Analytical Chemistry from Colorado State University.

Additional training

☑ Training in an environmental subject by a certified organization, please specify :Elaine Dorward-King and Diane Garrett completed a course offered jointly by Ceres and UC Berkeley School of Law titled "ESG: Navigating the Board's Role." It was a six module/six hour course they completed in March-April 2021.

Experience

☑ Executive-level experience in a role focused on environmental issues

☑ Management-level experience in a role focused on environmental issues

Water

(4.2.1) Board-level competency on this environmental issue

Select from:

☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

☑ Consulting regularly with an internal, permanent, subject-expert working group

☑ Engaging regularly with external stakeholders and experts on environmental issues

☑ Integrating knowledge of environmental issues into board nominating process

☑ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Academic

☑ Undergraduate education (e.g., BSc/BA in environment and sustainability, climate science, environmental science, water resources management, environmental engineering, forestry, etc.), please specify

☑ Postgraduate education (e.g., MSc/MA/PhD in environment and sustainability, climate science, environmental science, water resources management, forestry, etc.), please specify :Dr. Dorward-King holds a bachelor's degree from Maryville College and received a PhD in Analytical Chemistry from Colorado State University.

Additional training

☑ Training in an environmental subject by a certified organization, please specify :Elaine Dorward-King and Diane Garrett completed a course offered jointly by Ceres and UC Berkeley School of Law titled "ESG: Navigating the Board's Role." It was a six module/six hour course they completed in March-April 2021.

Experience

☑ Executive-level experience in a role focused on environmental issues

☑ Management-level experience in a role focused on environmental issues

[Fixed row]

(4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	*Select from:* ☑ Yes
Water	*Select from:* ☑ Yes
Biodiversity	*Select from:* ☑ Yes

[Fixed row]

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Sustainability committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing public policy engagement related to environmental issues

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

Other

☑ Other, please specify :Both assessing and managing climate-related risks and opportunities

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ Quarterly

(4.3.1.6) Please explain

It is the responsibility of the Sustainability Committee a standing committee of NOVAGOLDs Board of Directors and ultimately the Board to oversee NOVAGOLD's climate change activities and performance. While oversight and final approval of implementation and management practices into strategic decisions goals and financial planning comes from the Board the Committee provides information guidance and strategic direction to management on these matters. The Committee holds quarterly meetings to discuss climate-related issues and provides reports to the Board at each of the Boards regular meetings. The Committee monitors performance against each of the goals established in this Policy as well as tracking the climate change risks at the corporate level and reporting on them to the Board.

Water

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Sustainability committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing public policy engagement related to environmental issues

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Measuring progress towards environmental science-based targets

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ Quarterly

(4.3.1.6) Please explain

At NOVAGOLD the highest management level position with responsibility for water related issues is NOVAGOLD's executive management team who provide at least quarterly updates to the Sustainability Committee that provides broader oversight At the Donlin Gold project level there is a permitting and environmental manager who works closely with NOVAGOLD and partner Barrick Gold Updates are also provided indirectly through the Donlin Gold Boards Technical Committee that is responsible for overseeing design and operation of the Donlin Gold project.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Sustainability committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Strategy and financial planning

☑ Implementing the business strategy related to environmental issues

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ Quarterly

(4.3.1.6) Please explain

Responsibility for implementing NOVAGOLDs Biodiversity Policy rests with the executive management team who reports directly to the President & Chief Executive Officer. The executive management team serves as the lead for all environmental issues including biodiversity and ecosystem services Compliance with the Policy is integral to their performance review with direct reporting also to the Sustainability Committee. The Sustainability Committee is a standing committee of NOVAGOLDs Board of Directors which oversees the company's biodiversity related activities and performance. While final approval of implementation and management practices rests with the Board the Committee provides crucial information guidance and strategic direction on these matters. The President & CEO holds ultimate accountability for social environmental health and safety performance supported by oversight from the management team at the corporate level Given the location of our operations in Western Alaska NOVAGOLD places particular emphasis on preserving the regions biodiversity. The Board initiated the development of a Biodiversity Policy in 2022 and continues to oversee biodiversity management at operational sites emphasizing the stewardship of biological resources Collaboration with Alaska Native Corporations is central to our biodiversity protection efforts ensuring their local knowledge and perspectives are consistently integrated into our strategies.
[Add row]

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Climate change

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ Yes

(4.5.3) Please explain

Although not explicit, ESG performance is assessed through the goals set for the Company and senior management. A recent update to the Risk Management process utilizes these goals, including those relating to ESG and the development of a Climate Change Policy. The Company establishes rigorous annual goals and discloses details of levels of achievement for the goals of the previous year and for the upcoming year in the Management Information Circular. The executive team and Board work together to set long-term strategic company goals and short-term annual goals. The assessment of performance against these goals is monitored regularly during the year by the board. At the end of each year, the compensation committee leads the annual review of company goal-setting and performance, executive performance evaluations, and setting of the executive and director compensation programs, as well as provides recommendations on those topics to the board for its consideration.

Water

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ No, and we do not plan to introduce them in the next two years

(4.5.3) Please explain

At present our water consumption is not substantial as all withdrawn water is returned to the natural system and we do not operate in an area of water scarcity or where water availability is a large concern. However as we advance through planning and development over the next 5 years water will be considered as a priority and we would expect performance based metrics and targets to be established for Donlin Gold. This would be done in conjunction with Climate Change and Biodiversity policy development and implementation. For existing operations we have temporary water use permits for Donlin Gold and compliance with these permits including allowable withdrawal volumes is included in our annual performance evaluations and therefore affects employee compensation While federal permits were obtained in 2018 and most key State permits have been obtained additional permits are required to operate. Therefore, while there is currently no financial remuneration tied to water-related performance.

Biodiversity

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ No, and we do not plan to introduce them in the next two years

(4.5.3) Please explain

Currently, our operations at Donlin Gold have minimal impact on biodiversity, thanks to careful mitigation efforts. There are no direct monetary incentives tied to biodiversity as an environmental issue. However, over the next five years, biodiversity will increasingly become a greater priority. We plan to establish performance based metrics and targets for Donlin Gold, similar to our water use approach, aligning with our Climate Change and Biodiversity policies. The Donlin Gold (FEIS) thoroughly assessed biodiversity concerns, evaluating potential impacts on local and regional flora and fauna, including sensitive species, and considering expected ecosystem changes due to climate change. Project plans and permits include stringent requirements for biodiversity monitoring and mitigation, which will be enforced as we move toward construction and operation. While there is currently no financial remuneration tied to biodiversity performance, this may change in the future. [Fixed row]

(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).

Climate change

(4.5.1.1) Position entitled to monetary incentive

Senior-mid management

☑ Other senior-mid manager, please specify :All employees

(4.5.1.2) Incentives

Select all that apply

☑ Other, please specify :Monetary Reward

(4.5.1.3) Performance metrics

Targets

☑ Other targets-related metrics, please specify :Climate change and biodiversity policy development implementation

Engagement

☑ Other engagement-related metrics, please specify :Behavior change related indicator

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

(4.5.1.5) Further details of incentives

NOVAGOLD's Short-Term Incentive Plan (STIP) and annual bonuses are closely aligned with the company's ESG goals and initiatives. Under the STIP, a portion of compensation is tied to the achievement of specific ESG-related targets, reflecting the company's commitment to integrating sustainability into its business practices. The STIP incorporates a range of ESG metrics, including environmental performance, safety, and community engagement. For instance, NOVAGOLD has historically

linked a significant portion of annual bonuses to the successful management of environmental and safety standards. This alignment ensures that performance is evaluated not only on financial and operational outcomes but also on the progress towards key ESG objectives. In recent years, NOVAGOLD has increasingly emphasized its commitment to sustainable practices in its compensation structure. For example, the company's 2025 proxy statement highlighted that ESG goals, such as reducing environmental impact and enhancing community relations, are integral to the performance metrics used to determine bonuses. This approach incentivizes executives to prioritize ESG considerations, thereby fostering a corporate culture that supports long-term sustainability and responsible stewardship of resources. Overall, NOVAGOLD's STIP and annual bonus structure are designed to reinforce its dedication to ESG principles, ensuring that executive rewards are closely tied to achieving measurable sustainability and social impact goals.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

NOVAGOLD's compensation structure aligns executive and key personnel incentives with the company's environmental commitments and climate transition goals by incorporating specific ESG metrics into its STIP. A portion of annual bonuses is tied to the achievement of environmental targets, such as reducing greenhouse gas emissions and improving sustainability practices. This performance-based reward system ensures that achieving these ESG objectives directly influences monetary incentives. By integrating climate transition goals into compensation criteria and maintaining transparency through public reporting, NOVAGOLD ensures that its leaders are motivated to advance its environmental and climate strategy, thus reinforcing the company's dedication to sustainability.
[Add row]

(4.6) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?
	Select from: ☑ Yes

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

Select all that apply

☑ Climate change

(4.6.1.2) Level of coverage

Select from:

☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

(4.6.1.4) Explain the coverage

NOVAGOLD acknowledges the urgency of climate change and supports the global transition to a low-carbon economy. We aim to achieve Net Zero Carbon Emissions by 2050, integrating climate considerations across all operations, subsidiaries, and partnerships. Our approach includes tracking, managing, and transparently reporting emissions at the corporate and asset level, including Scope 1 and Scope 2, and Scope 3 when projects become operational. We strive for energy efficiency, minimize greenhouse gas (GHG) emissions where feasible, and explore renewable and non-fossil fuel energy opportunities through feasibility studies and targeted investments aligned with project and community needs. Where practical and economic, we will also pursue carbon sequestration and offsetting options. Climate risk is systematically assessed and managed throughout all project development stages. Our broader sustainability strategy emphasizes responsible environmental practices, community engagement, and ethical operations. This commitment is further supported by NOVAGOLD's Human Rights Policy, ensuring our climate actions uphold and enhance the rights and well-being of the communities we impact.

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to implementation of nature-based solutions that support landscape restoration and long-term protection of natural ecosystems

Climate-specific commitments

☑ Other climate-related commitment, please specify :Commitment to integrate climate considerations into our operations.

Social commitments

☑ Commitment to respect and protect the customary rights to land, resources, and territory of Indigenous Peoples and Local Communities

☑ Commitment to respect internationally recognized human rights
☑ Other social commitment, please specify :Social license & Sustainable Development; Stakeholder Involvement

Additional references/Descriptions
☑ Other additional reference/description, please specify :Strive to achieve Net Zero Carbon Emissions by 2050

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply
☑ Yes, in line with the Paris Agreement

(4.6.1.7) Public availability

Select from:
☑ Publicly available

(4.6.1.8) Attach the policy

2025-08-27_NOVAGOLD_CLIMATE-CHANGE-POLICY.pdf

Row 2

(4.6.1.1) Environmental issues covered

Select all that apply
☑ Biodiversity

(4.6.1.2) Level of coverage

Select from:
☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

(4.6.1.4) Explain the coverage

NOVAGOLD recognizes biodiversity as essential to ecosystem services, environmental assets, and long-term sustainability. We are committed to minimizing impacts through alignment with global standards such as IFC PS6 and by striving for no net loss of significant biodiversity. We are assessing impacts and dependencies and are in the process of developing site-specific Biodiversity Action Plans. Our approach includes community engagement, education, and investments in avoidance, mitigation, and restoration—reinforcing our commitment to responsible environmental stewardship.

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to comply with regulations and mandatory standards

☑ Commitment to take environmental action beyond regulatory compliance

☑ Commitment to implementation of nature-based solutions that support landscape restoration and long-term protection of natural ecosystems

☑ Commitment to No Net Loss

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

☑ Yes, in line with another global environmental treaty or policy goal, please specify

(4.6.1.7) Public availability

Select from:

☑ Publicly available

(4.6.1.8) Attach the policy

2025-08-27_NOVAGOLD_BIODIVERSITY-POLICY.pdf

Row 3

(4.6.1.1) Environmental issues covered

Select all that apply

☑ Water

(4.6.1.2) Level of coverage

Select from:

☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

(4.6.1.4) Explain the coverage

NOVAGOLD places environmental management as a top corporate priority, emphasizing stewardship for future generations alongside safe, responsible, and profitable operations. Across exploration, development, mining, and closure stages, we maintain high standards through the following principles: We commit to communicating our dedication to environmental excellence to subsidiaries, employees, contractors, and communities. All activities will comply with laws; in unregulated areas, we apply best practices to minimize environmental risks. We manage historical mining impacts collaboratively with prior owners, government agencies, and communities. Using an environmental management system, we prioritize, plan, implement, monitor, and transparently report on environmental efforts. We strive to minimize air, land, and water releases, ensuring proper waste treatment and disposal. Resources are allocated to fulfil reclamation and environmental responsibilities. We continuously improve environmental performance through adherence to these principles. Regular progress reports to employees, shareholders, and communities ensure transparency and accountability.

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to engage in integrated, multi-stakeholder landscape (including river basin) initiatives to promote shared sustainability goals

☑ Commitment to stakeholder engagement and capacity building on environmental issues

Water-specific commitments

☑ Commitment to control/reduce/eliminate water pollution

Social commitments

☑ Commitment to respect and protect the customary rights to land, resources, and territory of Indigenous Peoples and Local Communities

☑ Commitment to respect internationally recognized human rights

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

☑ No, and we do not plan to align in the next two years

(4.6.1.7) Public availability

Select from:

☑ Publicly available

(4.6.1.8) Attach the policy

Environmental_Policy .pdf

Row 4

(4.6.1.1) Environmental issues covered

Select all that apply

☑ Climate change

(4.6.1.2) Level of coverage

Select from:

☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

(4.6.1.4) Explain the coverage

NOVAGOLD recognizes the imminent climate changes and the global shift towards a low-carbon economy. This policy outlines our commitment to integrate climate considerations into our operations. It applies to NOVAGOLD, its subsidiaries, and partnerships, ensuring adherence to climate goals across all assets. We aim to achieve Net Zero Carbon Emissions by 2050, tracking, managing, and reporting emissions comprehensively. Additionally, we prioritize energy efficiency, minimizing GHG emissions, and exploring renewable energy investments. Our approach includes broader climate sustainability efforts, fostering responsible practices and community collaboration. We ensure rigorous climate risk assessment and management across all operational stages, integrating these into project development plans. This commitment is further supported by NOVAGOLD's Human Rights Policy, which underscores our dedication to upholding human rights and ethical practices in all aspects of our operations, ensuring that our climate and sustainability efforts respect and enhance the rights and well-being of the communities we impact.

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to implementation of nature-based solutions that support landscape restoration and long-term protection of natural ecosystems

☑ Other environmental commitment, please specify :Commitment to integrate climate considerations into our operations

Social commitments

☑ Commitment to respect and protect the customary rights to land, resources, and territory of Indigenous Peoples and Local Communities

☑ Commitment to respect internationally recognized human rights

☑ Other social commitment, please specify :Social License & Sustainable Development; Stakeholder Involvement

Additional references/Descriptions

☑ Other additional reference/description, please specify :Strive to achieve Net Zero Carbon Emissions by 2050

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

☑ Yes, in line with the Paris Agreement

(4.6.1.7) Public availability

Select from:

☑ Publicly available

(4.6.1.8) Attach the policy

2025-08-27_Human-Rights-Policy.pdf

Row 5

(4.6.1.1) Environmental issues covered

Select all that apply

☑ Water

(4.6.1.2) Level of coverage

Select from:

☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

(4.6.1.4) Explain the coverage

NOVAGOLD places environmental management as a top corporate priority, emphasizing stewardship for future generations alongside safe, responsible, and profitable operations. Across exploration, development, mining, and closure stages, we maintain high standards through the following principles: We commit to communicating our dedication to environmental excellence to subsidiaries, employees, contractors, and communities. All activities will comply with laws; in unregulated areas, we apply best practices to minimize environmental risks. We manage historical mining impacts collaboratively with prior owners, government agencies, and communities. Using an environmental management system, we prioritize, plan, implement, monitor, and transparently report on environmental efforts. We strive to minimize air, land, and water releases, ensuring proper waste treatment and disposal. Resources are allocated to fulfil reclamation and environmental responsibilities. We continuously improve environmental performance through adherence to these principles. Regular progress reports to employees, shareholders, and communities ensure transparency and accountability.

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to engage in integrated, multi-stakeholder landscape (including river basin) initiatives to promote shared sustainability goals

☑ Commitment to stakeholder engagement and capacity building on environmental issues

Water-specific commitments
☑ Commitment to control/reduce/eliminate water pollution

Social commitments
☑ Commitment to respect and protect the customary rights to land, resources, and territory of Indigenous Peoples and Local Communities
☑ Commitment to respect internationally recognized human rights

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply
☑ No, and we do not plan to align in the next two years

(4.6.1.7) Public availability

Select from:
☑ Publicly available

(4.6.1.8) Attach the policy

2025-08-27_Human-Rights-Policy.pdf
[Add row]

(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

	Are you a signatory or member of any environmental collaborative frameworks or initiatives?
	Select from:

	Are you a signatory or member of any environmental collaborative frameworks or initiatives?
	☑ No, and we do not plan to within the next two years

[Fixed row]

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Select all that apply

☑ Yes, we engaged directly with policy makers

☑ Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Select from:

☑ No, but we plan to have one in the next two years

(4.11.5) Indicate whether your organization is registered on a transparency register

Select from:

☑ Yes

(4.11.6) Types of transparency register your organization is registered on

Select all that apply

☑ Mandatory government register

(4.11.7) Disclose the transparency registers on which your organization is registered & the relevant ID numbers for your organization

NOVAGOLD's ESTMA ID number is E258877.

(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

To ensure our external engagement activities align with our environmental commitment, we follow a structured process that integrates our community relations and government affairs strategies with the expertise of Alaska Native Corporations. We engage with stakeholders at local, regional, statewide, and national levels through a comprehensive stakeholder engagement plan. This plan, updated annually in collaboration with Calista and TKC, directs our outreach efforts at the project level. It carefully considers each stakeholder's responsibility, proximity, dependence, and representation in the project region, ensuring our activities remain consistent with our environmental commitment.
[Fixed row]

(4.11.1) On what policies, laws, or regulations that may (positively or negatively) impact the environment has your organization been engaging directly with policy makers in the reporting year?

Row 1

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

At NOVAGOLD, we engage with policymakers through key organizations focused on environmental issues and water management. We collaborate with the Alaska Miners Association, AK Metals Mines, the American Exploration and Mining Association, and the National Mining Association. Additionally, we strive align with industry standards set by the International Council on Mining and Metals (ICMM) regarding energy, emissions, and climate change.

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

☑ Water

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Environmental impacts and pressures

☑ Other environmental impacts and pressures, please specify :Water Management; Adaption and/or resilience to climate change

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ National

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ United States of America

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

☑ Support with no exceptions

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Ad-hoc meetings

☑ Participation in working groups organized by policy makers

☑ Participation in voluntary government programs

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

82694

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The potential environmental effects of the proposed mine were detailed and evaluated as part of the National Environmental Policy Act process. The FEIS was issued in August 2018 and not only includes the potential effects of the future mine on climate change, but also the potential effects of climate change on the future mine itself; these risks are considered and have been incorporated in the project design. The effects of climate change, including the impacts of extreme weather conditions and melting permafrost, are incorporated into all permitting submissions, as well as design engineering and operational and closure planning. Further, the FEIS considered biodiversity by evaluating in detail the potential project effects on local, regional, and state-wide flora and fauna populations, including important and sensitive species. The analysis specifically addressed how the ecosystem may change over time due to climate change. The project plan and permits include extensive biodiversity monitoring and mitigation requirements that will be fully implemented as Donlin Gold moves to project construction and operation. Finally, a reclamation and closure plan for the proposed mine has already been developed and approved by the State of Alaska to ensure that, when mining activity ceases, the mine is closed, and the land is reclaimed and restored. As required by state law and consistent with leading practice, this plan will be reviewed and updated periodically throughout operations. An extensive environmental baseline-study program has been ongoing since 1996 to provide a foundation for responsible development. Resources and topics in the baseline-study program include air quality, fish and other aquatic resources, geotechnical conditions, hydrology/ground and surface water quality and quantity, land use, mercury, public health, socioeconomics, sediment quality, subsistence, vegetation, wetlands, and wildlife. Data from these studies have been used in the planning and design of the mine, and to establish environmental conditions prior to project development. All of this data has been submitted to regulatory agencies as part of the FEIS and permitting processes.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

[Add row]

(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.

Row 1

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Global

☑ Other global trade association, please specify :Alaska Miners Association, AK Metals Mines, the American Exploration and Mining Association, and the National Mining Association; Additionally, we strive to align with and adhere to the standards of the International Council on Mining and Metals.

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

NOVAGOLD's 50/50 partner in the Donlin Gold project, Barrick Mining is a member of the ICMM https://www.icmm.com/ and as a result of this, the Donlin Gold project will strive to comply with ICMM standards for climate change. For additional information on the ICMM position on climate change, please see the link: https://www.icmm.com/en-gb/environmental-stewardship/climate-change. Highlights of this commitment are 1) General agreement with the Paris Agreement goals to limit temperature increases to no more than 2 degrees C and ideally 1.5 C 2) Commitment to operational controls and mitigation to limit GHG emissions 3) Commitment to the development and use of cleaner vehicles that limit emissions. ICMM members are expected to report on their Scope 1 and Scope 2 emissions, and this is likely to expand to Scope 3 soon. They have also committed to Net Zero by 2050. NOVAGOLD and Barrick Gold are both members of the National Mining Association in the USA (NMA). In 2021 the NMA published a climate change policy with advisory input from members of the NOVAGOLD management team included on the NMA's ESG task force, a select group of NMA members that have been working on developing the policy. The policy recognizes how metal mining is an integral part of the transition to clean energy, the significance of climate change, and commit members to developing approaches to limit emissions. In Alaska, NOVAGOLD management team members are involved with industry trade organizations in the State, including the Council of Alaska Producers, the Alaska Miners Association, and the Resource Development Council. These organizations primarily focus on economic and regulatory issues and have not developed extensive climate change positions. * This CDP Questionnaire covers the period from January 1, 2024, to December 31, 2024 – prior to NOVAGOLD's June 3, 2025 announcement of the successful closing of their previously disclosed acquisition of Barrick Mining's 50% interest in the Donlin Gold project, establishing new ownership of Donlin Gold LLC to advance the Donlin Gold project in Alaska.*

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

82694

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

N/A

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☑ No, we have not evaluated

[Add row]

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Select from:

☑ Yes

(4.12.1) Provide details on the information published about your organization’s response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

Row 1

(4.12.1.1) Publication

Select from:
☑ In voluntary sustainability reports

(4.12.1.3) Environmental issues covered in publication

Select all that apply
☑ Climate change
☑ Water
☑ Biodiversity

(4.12.1.4) Status of the publication

Select from:
☑ Complete

(4.12.1.5) Content elements

Select all that apply
☑ Strategy
☑ Governance
☑ Emission targets
☑ Emissions figures
☑ Risks & Opportunities
☑ Content of environmental policies
☑ Dependencies & Impacts
☑ Biodiversity indicators
☑ Public policy engagement
☑ Water accounting figures
☑ Water pollution indicators

☑ Other, please specify **:Community Engagement**

(4.12.1.6) Page/section reference

Overview - 3-8...ESG Approach and Management 10-12...Health and Safety 16-18...Environment 20-25...Communities 31-38...People 41-44...Governance 46-50...2024...Data Tables 51-63

(4.12.1.7) Attach the relevant publication

2024-NOVAGOLD-Sustainability-Report-FINAL.pdf

(4.12.1.8) Comment

NOVAGOLD's fifth annual sustainability report, which has been prepared to align with core Global Reporting Initiative (GRI) Standards, integrating climate- and nature-related risk management disclosure in alignment with the recommendations of the Taskforce on Climate-Related Financial Disclosures (TCFD) and Taskforce on Nature-Related Financial Disclosures (TNFD). The contents of this report pertain to activities conducted by NOVAGOLD and Donlin Gold LLC. All data presented covers the period from January 1, 2024, to December 31, 2024.
[Add row]

C5. Business strategy

(5.1) Does your organization use scenario analysis to identify environmental outcomes?

Climate change

(5.1.1) Use of scenario analysis

Select from:
☑ Yes

(5.1.2) Frequency of analysis

Select from:
☑ Annually

Water

(5.1.1) Use of scenario analysis

Select from:
☑ Yes

(5.1.2) Frequency of analysis

Select from:
☑ Annually
[Fixed row]

(5.1.1) Provide details of the scenarios used in your organization’s scenario analysis.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ NGFS scenarios framework, please specify :Strive for Net Zero 2050 (In line with the Paris Agreement and commitments made by industry bodies such as the ICMM, NOVAGOLD’s long-term climate ambition is to strive to achieve Net Zero Carbon Emissions by 2050.

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

☑ Reputation

☑ Technology

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.5°C or lower

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2040

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Speed of change (to state of nature and/or ecosystem services)

☑ Climate change (one of five drivers of nature change)

Finance and insurance

☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

☑ Consumer sentiment

☑ Consumer attention to impact

☑ Impact of nature footprint on reputation

Regulators, legal and policy regimes

☑ Global regulation

☑ Level of action (from local to global)

Direct interaction with climate

☑ On asset values, on the corporate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Net-zero 2050 assumes global warming is limited to 1.5°C through stringent climate policies and innovation, reaching global net zero CO2 emissions around 2050. Some jurisdictions such as the US, EU and Japan reach net zero for all GHGs.

(5.1.1.11) Rationale for choice of scenario

Scenario analysis is an important tool emphasized by the TCFD recommendations to aid in the assessment of potential business implications resulting from potential climate-related risks and opportunities. NOVAGOLD utilizes scenarios developed by the Network for Greening the Financial System, recommended by TCFD, to. assess the potential impacts of relevant risks and opportunities at an enterprise-level. NGFS scenarios explore a diverse range of potential futures based on plausible socio-economic decisions which present different possible transition and physical risks and opportunities relevant to NOVAGOLD over long time horizons, up to 2050 and beyond.

Water

(5.1.1.1) Scenario used

Water scenarios

☑ Customized publicly available water scenario, please specify :Water-related Climate-related

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

☑ Other, please specify :For the Donlin Gold project, we look at the full range of potential water balances (precipitation driven) during the 27-year mine life.

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

Stakeholder and customer demands

☑ Impact of nature footprint on reputation

Direct interaction with climate

☑ Perception of efficacy of climate regime

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

For the Donlin Gold project, we assess the complete spectrum of potential water balances driven by precipitation over its 27-year mine life. This comprehensive approach includes scenarios for low, typical, and above-average water years, ensuring our water management plans are prepared for all possibilities. Additionally, we analyze potential future variability attributed to climate change, modeling a wide range of precipitation conditions throughout the mine's lifespan. This includes sequences of consecutive wet and dry months/years, as well as variations of up to +/- 25% due to climate change. Factors such as precipitation levels, our water supply requirements, and various water management strategies are fully integrated into a project-specific water balance model.

(5.1.1.11) Rationale for choice of scenario

Design water supply and management systems to accommodate lesser and greater water volumes predicted by the model.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ NGFS scenarios framework, please specify :Current Policies

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

☑ Reputation

☑ Technology

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 2.0ºC - 2.4ºC

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025
☑ 2030
☑ 2040
☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts
☑ Changes to the state of nature
☑ Speed of change (to state of nature and/or ecosystem services)
☑ Climate change (one of five drivers of nature change)

Finance and insurance
☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands
☑ Consumer sentiment
☑ Consumer attention to impact
☑ Impact of nature footprint on reputation

Regulators, legal and policy regimes
☑ Global regulation
☑ Level of action (from local to global)

Direct interaction with climate
☑ On asset values, on the corporate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Hot House World Current Policies assumes that only currently implemented policies are preserved, leading to high physical risks.

(5.1.1.11) Rationale for choice of scenario

Scenario analysis is an important tool emphasized by the TCFD recommendations to aid in the assessment of potential business implications resulting from potential climate-related risks and opportunities. NOVAGOLD utilizes scenarios developed by the Network for Greening the Financial System, recommended by TCFD to assess the potential impacts of relevant risks and opportunities at an enterprise-level. NGFS scenarios explore a diverse range of potential futures based on plausible socio-economic decisions which present different possible transition and physical risks and opportunities relevant to NOVAGOLD over long time horizons, up to 2050 and beyond.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ NGFS scenarios framework, please specify :Disorderly - delayed transition

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

☑ Reputation

☑ Technology

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 4.0ºC and above

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2040

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Speed of change (to state of nature and/or ecosystem services)

☑ Climate change (one of five drivers of nature change)

Finance and insurance

☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

☑ Consumer sentiment

☑ Consumer attention to impact

☑ Impact of nature footprint on reputation

Regulators, legal and policy regimes

☑ Global regulation

☑ Level of action (from local to global)

Direct interaction with climate

☑ On asset values, on the corporate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Disorderly delayed assumes annual emissions do not decrease until 2030. Strong policies are needed to limit warming to below 2°C. CO2 removal is limited.

(5.1.1.11) Rationale for choice of scenario

Scenario analysis is an important tool emphasized by the TCFD recommendations to aid in the assessment of potential business implications resulting from potential climate-related risks and opportunities. NOVAGOLD utilizes scenarios developed by the Network for Greening the Financial System, recommended by TCFD to assess the potential impacts of relevant risks and opportunities at an enterprise-level. NGFS scenarios explore a diverse range of potential futures based on plausible socio-economic decisions which present different possible transition and physical risks and opportunities relevant to NOVAGOLD over long time horizons, up to 2050 and beyond.
[Add row]

(5.1.2) Provide details of the outcomes of your organization's scenario analysis.

Climate change

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

☑ Risk and opportunities identification, assessment and management

(5.1.2.2) Coverage of analysis

Select from:

☑ Organization-wide

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

Our scenario analysis of climate change risks has identified key outcomes and implications for broader environmental issues. Climate change risks are systematically incorporated into our corporate risk register and addressed through dedicated workshops to ensure adherence to TCFD requirements. These risks are categorized

into Transition risks—such as market, technology, policy, and legal changes—and Physical risks, which are further divided into acute (short-term, high impact) and chronic (long-term, gradual).Transition risks reveal that rising investor pressure and the shift towards low-carbon technologies could impact our operations and costs. Increased raw material and fuel costs may affect project expenses, and the need to transition to renewable energy might challenge our current plans. Additionally, new regulations and carbon pricing could heighten operating costs and complicate compliance, potentially jeopardizing project feasibility. Physical Rrisks encompass extreme weather events, like storms, wildfires, and severe cold, which could disrupt operations, damage infrastructure, and affect supply chains, leading to increased costs and delays. Long-term changes, such as sea level rise and altered river flows, may impact logistics and supply chains, necessitating operational adjustments. These risks have broader implications for biodiversity, reclamation, and deforestation, influencing our reputation and stakeholder perceptions. Overall, our analysis, based on scenarios from the Network for Greening the Financial System (NGFS), underscores the importance of proactively managing both transition and physical risks to address climate-related challenges effectively.

Water

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

☑ Other, please specify :Water-related Climate-related

(5.1.2.2) Coverage of analysis

Select from:

☑ Other, please specify :Project site-level

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

We model a comprehensive range of potential precipitation conditions over Donlin Gold's 27-year life of mine, incorporating projections influenced by climate change. This includes scenarios of consecutive wet and dry periods, as well as variations up to +/- 25% due to climate impacts. Our analysis considers the impact on precipitation levels, our water supply requirements, and integrates diverse water management strategies into a tailored water balance model for the project. This approach ensures that our design of water supply and management systems can effectively accommodate fluctuations in water volumes as predicted by the model. [Fixed row]

(5.2) Does your organization’s strategy include a climate transition plan?

(5.2.1) Transition plan

Select from:

☑ No and we do not plan to develop a climate transition plan within the next two years

(5.2.15) Primary reason for not having a climate transition plan that aligns with a 1.5°C world

Select from:

☑ Not an immediate strategic priority

(5.2.16) Explain why your organization does not have a climate transition plan that aligns with a 1.5°C world

We currently operate two small offices, one in Vancouver and one in Salt Lake City, and own 50% of the Donlin Gold project in Alaska, which is currently in the permitting process initiated in 2012. NOVAGOLD has been actively involved in the Donlin Gold project for over 20 years. While federal permits were secured in 2018 and most key state permits have been obtained, additional permits are necessary before operations can commence. Presently, we have no industrial operations, and no construction decision has been made regarding the Donlin Gold project. In 2021, NOVAGOLD conducted a Materiality Assessment of both the company and the Donlin Gold project. Beyond essential camp infrastructure that operates intermittently from spring to fall, minimal development has occurred. Our short-term focus spans 1-2 years, during which we anticipate minimal changes to current operations. Full-scale project construction is anticipated to be more than 2 years away, making it inappropriate to develop a transition plan aligned with a 1.5-degree world at this stage. As project design and capital expense estimates are finalized, alongside permitting requirements, we expect to identify current and future climate-related risks and opportunities. Climate change considerations are integral to our permitting and design processes, guided by best practices. While emissions are currently low, they are expected to increase (in absolute terms) during construction and operation phases. However, we are proactively planning to manage emission intensity, aiming to lead in this aspect compared to similar organizations.
[Fixed row]

(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

Select from:

☑ Yes, strategy only

(5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy

Select all that apply

☑ Products and services

☑ Upstream/downstream value chain

☑ Investment in R&D

☑ Operations

(5.3.3) Primary reason why environmental risks and/or opportunities have not affected your strategy and/or financial planning

Select from:

☑ Other, please specify :Financial quantification of the impacts of risks and/or opportunities has not taken place and so they have not directly affected financial planning.

(5.3.4) Explain why environmental risks and/or opportunities have not affected your strategy and/or financial planning

Financial quantification of the impacts of risks and/or opportunities has not taken place and so they have not directly affected financial planning.
[Fixed row]

(5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

Products and services

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

☑ Water

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Donlin Gold is currently in the permitting and development stage and focused on securing the few remaining permits required. NOVAGOLD has been actively engaged in this project for over 20 years. While federal permits were secured in 2018 and most key state permits have been obtained, additional permits are

necessary before operations can commence. At present, no decision has been made regarding construction. In 2021, NOVAGOLD conducted a Materiality Assessment of both the company and its primary asset, the Donlin Gold project, and will update the Materiality Assessment and Corporate Risk Register in 2025. We are currently in the permitting and development phase and do not yet produce gold or other minerals, resulting in no operating earnings. Minimal development has occurred aside from essential camp infrastructure, which operates intermittently from spring to fall. Our short-term focus extends to 1-2 years, during which we anticipate minimal changes to current operations. Given that full-scale project construction is anticipated to be more than 2 years away, it is not appropriate to develop a transition plan aligned with a 1.5-degree world at this time. As we finalize the project's design, capital expense estimates, and address permitting requirements, we anticipate identifying current and future climate-related risks and opportunities. Climate change considerations are integral to our permitting and design processes, adhering to best practices. This includes comprehensive attention to water-related risks that influence our business strategy at the Donlin Gold project site level. We are actively modeling various precipitation scenarios and their potential impacts over the project's 27-year lifespan, considering both natural variability and future changes due to climate change. Our water management plans are designed to accommodate these fluctuations, ensuring resilience and sustainability in our operations. Although emissions are currently low, they are expected to increase in absolute terms during construction and operation. We are proactively planning to manage emission intensity now to ensure leadership in this area compared to similar organizations.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

☑ Water

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

See description of influence for Products and Services.

Investment in R&D

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

NOVAGOLD has not conducted R&D investment to date.

Operations

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

☑ Water

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

The Donlin Gold project is in the development stage focused on securing the few remaining permits required. NOVAGOLD has been involved in the project for more than 20 years. While federal permits were obtained in 2018 and most key State permits are in hand, additional permits are required to operate. No construction decision has been made. An extensive environmental baseline-study program has been ongoing since 1996 to provide a foundation for responsible development. Resources and topics in the baseline-study program include air quality, fish and other aquatic resources, geotechnical conditions, hydrology/ground and surface water quality and quantity, land use, mercury, public health, sediment quality, subsistence, vegetation, wetlands, and wildlife. Data from these studies have been used in the planning and design of the mine, and to establish environmental conditions prior to project development. All of this data has been submitted to regulatory agencies as part of the Final Environmental Impact Statement and permitting processes. The project has been designed for no uncontrolled discharge of mine-contacted water. Any water that comes in contact with mine facilities would be used in the milling process to the maximum extent practicable or treated and discharged according to stringent permit standards. All runoff from field activities, including drill sites, is managed to protect water quality under state permit requirements. All sanitary wastewater from the camp is treated prior to disposal. All water withdrawals and uses are authorized by the State of Alaska. This process provides for protection of other local water uses, including ensuring no adverse impacts to streams and aquatic life use. Also, see C3.3 Description of influence for Products and services. [Add row]

(5.4) In your organization’s financial accounting, do you identify spending/revenue that is aligned with your organization’s climate transition?

	Identification of spending/revenue that is aligned with your organization's climate transition
	Select from: ☑ No, and we do not plan to in the next two years

[Fixed row]

(5.5) Does your organization invest in research and development (R&D) of low-carbon products or services related to your sector activities?

(5.5.1) Investment in low-carbon R&D

Select from:

☑ No

(5.5.2) Comment

No decision has been made to construct the mine or production facility. Once more decisions have been made and if construction begins, R&D investment will be considered.
[Fixed row]

(5.10) Does your organization use an internal price on environmental externalities?

(5.10.1) Use of internal pricing of environmental externalities

Select from:

☑ No, and we do not plan to in the next two years

(5.10.3) Primary reason for not pricing environmental externalities

Select from:

☑ Judged to be unimportant or not relevant

(5.10.4) Explain why your organization does not price environmental externalities

Not currently relevant due to very limited near-term water use and the minimal carbon intensity and usage associated with our operations at this stage.
[Fixed row]

(5.11) Do you engage with your value chain on environmental issues?

Suppliers

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ No, and we do not plan to within the next two years

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

☑ Not an immediate strategic priority

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

NOVAGOLD is committed to responsible mining, protecting human life, promoting good health, environmental stewardship, and benefiting local communities. We collaborate with local experts to minimize environmental impact and support economic activity. Sustainable development is central to our ethos, focusing on resource conservation and environmental preservation. Currently, climate issues do not affect our vendor relationships or supply chain. Our agreements primarily serve our Alaska Native Corporation (ANC) partners and core drillers. With no full-scale operations, we focus on limited exploration at Donlin Gold and activity at our small offices. As we approach project construction, we anticipate deeper engagement with our value chain. Our purchases are small-scale. At Donlin Gold, we work with Barrick to implement best practices. Stakeholder consultation is integral throughout our development process. Water use is minimal now, but as we progress to full-scale operations, water stewardship becomes crucial, ensuring all water is returned to the environment responsibly.

Customers

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ No, and we do not plan to within the next two years

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

☑ Not an immediate strategic priority

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

NOVAGOLD is committed to responsible mining, protecting human life, promoting good health, environmental stewardship, and benefiting local communities. We collaborate with local experts to minimize environmental impact and support economic activity. Sustainable development is central to our ethos, focusing on resource conservation and environmental preservation. Currently, climate issues do not affect our vendor relationships or supply chain. With no full-scale operations and no customers at this time, we focus on limited exploration activities at Donlin Gold and have small offices that use minimal amounts of water. Our life-of-mine agreements with the ANC corporations that own the minerals and surface include provisions for shareholder hire and bidder's preference, and we engage with these stakeholders throughout the procurement cycle. As we approach project construction, we anticipate deeper engagement with our value chain. Our purchases are small-scale and governed by ANC agreements. At Donlin Gold, we work with Barrick to implement best practices. Stakeholder consultation is integral throughout our development process. Water use is minimal now, but as we progress to full-scale operations, water stewardship becomes crucial, ensuring all water is returned to the environment responsibly.

Investors and shareholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ Yes

(5.11.2) Environmental issues covered

Select all that apply

☑ Climate change

☑ Water

Other value chain stakeholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ Yes

(5.11.2) Environmental issues covered

Select all that apply

☑ Climate change

☑ Water

[Fixed row]

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Other value chain stakeholder, please specify :Local community stakeholders; Government agencies; Alaska Native Corporation Partners

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Educate and work with stakeholders on understanding and measuring exposure to environmental risks

☑ Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services

☑ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☑ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ Unknown

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ Unknown

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

NOVAGOLD engages extensively with local community stakeholders, government representatives, and Alaska Native Corporation (ANC) landowners on climate change for several strategic reasons. Firstly, through comprehensive stakeholder engagement including interviews, surveys, and ongoing dialogue, NOVAGOLD ensures that diverse perspectives are heard and integrated into project planning. This approach fosters transparency and constructive dialogue, crucial for addressing environmental concerns like climate change. Collaboration with Calista and TKC underscores NOVAGOLD's commitment to respecting local values, cultures, and traditional lifestyles in the Y-K region. This partnership facilitates engagement with governmental entities at local, state (Alaska), and federal (Washington, D.C.) levels, enhancing regulatory compliance and permitting processes. The stakeholder engagement plan, developed annually in conjunction with Calista and TKC, guides outreach efforts tailored to each stakeholder's proximity, dependence, and representation in the project area. This proactive approach includes the Donlin Advisory Technical Review and Oversight Committee (DATROC) and the Subsistence Community Advisory Committee (SCAC), ensuring ongoing feedback and input from community leaders and stakeholders. Moreover, Donlin Gold's community relations initiatives focus on creating sustainable economic opportunities and enhancing local livelihoods. Supporting various community projects and organizations reflects a commitment to long-term positive impact beyond the mine's operational life. This community-centric approach not only strengthens relationships but also promotes socio-economic development and reduces poverty in host communities. In collaboration with Calista and the Village of Crooked Creek, Donlin Gold engages in proactive outreach with Alaskan communities, emphasizing the rigorous environmental review and permitting processes. This outreach aims to build trust and highlight partnerships with Native Alaskans who hold stewardship over the land and resources. By prioritizing openness, transparency, and mutual respect in stakeholder engagement, NOVAGOLD aims to develop operations that generate shared value and sustainable benefits for all stakeholders. This integrated approach aligns environmental stewardship with socio-economic development goals, ensuring responsible mining practices that contribute positively to the communities and environments in which they operate.

(5.11.9.6) Effect of engagement and measures of success

NOVAGOLD collaborates closely with local stakeholders, government representatives, and Donlin Gold's ANC landowners at Donlin Gold to advance environmental initiatives and maintain a strong social license. This approach aims to deliver economic, social, and environmental benefits to the Y-K region. Through stakeholder engagement via interviews, surveys, and ongoing dialogue, NOVAGOLD addresses environmental concerns like climate change collaboratively, fostering transparency and trust crucial for project acceptance. Partnership with Calista and TKC ensures alignment with local cultures and regulatory standards across local, state (Alaska), and federal (Washington, D.C.) levels, supporting robust environmental stewardship and permitting processes. An annual stakeholder engagement plan, developed with Calista and TKC, tailors outreach efforts to meet local stakeholder needs, and is guided by the DATROC and the SCAC. Donlin Gold's community initiatives prioritize sustainable economic development through local projects, investments in education, and cultural support, aiming for lasting positive impacts beyond the mine's operations. Through proactive outreach and collaboration with Calista, the Village of Crooked Creek, and stakeholders, Donlin Gold emphasizes environmental stewardship and partnerships with Native Alaskans.

Water

(5.11.9.1) Type of stakeholder

Select from:

☑ Other value chain stakeholder, please specify :Local community stakeholders; government agencies; Alaska Native Corporation landowners

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Educate and work with stakeholders on understanding and measuring exposure to environmental risks

☑ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☑ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

☑ Encourage collaborative work in multi-stakeholder landscape towards initiatives for sustainable land-use goals

☑ Incentivize collaborative sustainable water management in river basins

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ Unknown

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

NOVAGOLD engages with local community stakeholders government representatives and Donlin Gold's ANC landowners to address water-related issues strategically. Through stakeholder interviews surveys and ongoing dialogue they ensure community perspectives shape water management strategies fostering transparency and trust crucial for maintaining the projects social license. Collaboration with Calista Corporation and TKC extends to local state Alaska and federal Washington DC levels enhancing regulatory compliance and permitting processes. An annual stakeholder engagement plan developed with Calista and TKC guides tailored outreach efforts. The DATROC, along with the SCAC, involves senior leaders and provides continuous community feedback on water-related activities. Donlin Golds community relations team prioritizes sustainable water stewardship and supports local development projects and initiatives aiming for lasting positive impacts. Proactive outreach and partnerships underscore rigorous environmental stewardship emphasizing compliance and community partnerships with Native Alaskans. Overall NOVAGOLD integrates environmental responsibility with social and economic goals at Donlin Gold ensuring sustainable benefits for the Y-K regions communities and environments through robust engagement and stewardship.

(5.11.9.6) Effect of engagement and measures of success

NOVAGOLDs engagement with local stakeholders government representatives and Donlin Gold's ANC landowners focuses on strategic water management. Through stakeholder input via interviews surveys and ongoing dialogue they ensure transparency and trust crucial for maintaining the projects social license. Collaboration with Calista and TKC spans regulatory compliance at local state and federal levels. Annual stakeholder engagement plans guide tailored outreach efforts, supported by the DATROC and the SCAC. Donlin Golds community relations prioritize sustainable water stewardship and local development projects fostering lasting positive impacts and environmental stewardship. This integrated approach supports economic growth and enhances community wellbeing in the Y-K region.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Educate and work with stakeholders on understanding and measuring exposure to environmental risks

☑ Share information on environmental initiatives, progress and achievements

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ Unknown

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ Unknown

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

NOVAGOLD prioritizes transparent engagement with our investors and shareholders on environmental issues including climate change. Through proxy engagement, proxy voting, post-proxy engagement, and the preparation and publication of the annual sustainability report, we actively foster discussions that address investor feedback and requests related to environmental performance. This collaborative approach allows us to monitor key environmental metrics and align our strategies with recognized and standard sustainability reporting practices. By integrating their insights and expectations into our decision-making processes, we aim to enhance our commitment to sustainable development while building trust and accountability within the financial community.

(5.11.9.6) Effect of engagement and measures of success

At a high level, NOVAGOLD's engagement with investors on climate change emphasizes transparency and collaboration. By prioritizing open communication, including proxy voting and private consultations, the company actively addresses investor feedback regarding environmental performance. This engagement helps monitor essential environmental metrics and aligns strategies with recognized sustainability reporting standards. By integrating investor and shareholder insights, NOVAGOLD not only enhances its commitment to sustainable development but also fosters trust and accountability within the financial community. Ultimately, this approach positions the company as a responsible leader in environmental stewardship, contributing to both investor confidence and long-term sustainability goals.

Water

(5.11.9.1) Type of stakeholder

Select from:

☑ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Educate and work with stakeholders on understanding and measuring exposure to environmental risks

☑ Share information on environmental initiatives, progress and achievements

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ Unknown

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

NOVAGOLD prioritizes transparent engagement with our investors and shareholders on environmental issues including climate change. Through proxy engagement, proxy voting, post-proxy engagement, and the preparation and publication of the annual sustainability report, we actively foster discussions that address investor feedback and requests related to environmental performance. This collaborative approach allows us to monitor key environmental metrics and align our strategies with recognized and standard sustainability reporting practices. By integrating their insights and expectations into our decision-making processes, we aim to enhance our commitment to sustainable development while building trust and accountability within the financial community.

(5.11.9.6) Effect of engagement and measures of success

At a high level, NOVAGOLD's engagement with investors on water-related matters emphasizes transparency and collaboration. By prioritizing open communication, including proxy voting and private consultations, post-proxy engagement, and the preparation and publication of the annual sustainability report, we actively foster discussions that address investor feedback and requests related to environmental performance. This engagement helps monitor essential environmental metrics and aligns strategies with recognized sustainability reporting standards. By integrating investor and shareholder insights, NOVAGOLD not only enhances its commitment to sustainable development but also fosters trust and accountability within the financial community. Ultimately, this approach positions the company as a responsible leader in environmental stewardship, contributing to both investor confidence and long-term sustainability goals.
[Add row]

C6. Environmental Performance - Consolidation Approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

Climate change

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

NOVAGOLD has chosen to adopt the operational control consolidation approach for climate change (inclusive of GHG emissions) reporting as defined by the Environmental Protection Agency (EPA). This approach is influenced by NOVAGOLD's operational structure, specifically its ownership in the Donlin Gold project. NOVAGOLD holds a 50% ownership and operational stake in the Donlin Gold project, with the remaining 50% owned by Barrick Mining. As a result, of this operational stake in Donlin Gold, NOVAGOLD reports 100% of Donlin Gold climate change performance metrics in Company reporting.

Water

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

NOVAGOLD has chosen to adopt the operational control consolidation approach for water reporting. This approach is influenced by NOVAGOLD's operational structure, specifically their ownership in the Donlin Gold project. NOVAGOLD holds a 50% ownership and operational stake in the Donlin Gold project, with the remaining 50% owned by Barrick Mining, as joint venture partners. As a result, of this operational stake in Donlin Gold, NOVAGOLD reports 100% of Donlin Gold water performance metrics in Company reporting.

Plastics

(6.1.1) Consolidation approach used

Select from:

☑ Other, please specify :None

(6.1.2) Provide the rationale for the choice of consolidation approach

N/A

Biodiversity

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

NOVAGOLD has chosen to adopt the operational control consolidation approach for biodiversity reporting. This approach is influenced by NOVAGOLD's operational structure, specifically their ownership in the Donlin Gold project. NOVAGOLD holds a 50% ownership and operational stake in the Donlin Gold project, with the remaining 50% owned by Barrick Mining. As a result, of this operational stake in Donlin Gold, NOVAGOLD reports 100% of Donlin Gold biodiversity performance metrics in Company reporting.
[Fixed row]

C7. Environmental performance - Climate Change

(7.1) Is this your first year of reporting emissions data to CDP?

Select from:
☑ No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

	Has there been a structural change?
	Select all that apply ☑ No

[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

	Change(s) in methodology, boundary, and/or reporting year definition?
	Select all that apply ☑ No

[Fixed row]

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

☑ US EPA Center for Corporate Climate Leadership: Direct Emissions from Stationary Combustion Sources

☑ US EPA Center for Corporate Climate Leadership: Direct Emissions from Mobile Combustion Sources

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

(7.3.1) Scope 2, location-based

Select from:

☑ We are reporting a Scope 2, location-based figure

(7.3.2) Scope 2, market-based

Select from:

☑ We have no operations where we are able to access electricity supplier emission factors or residual emissions factors and are unable to report a Scope 2, market-based figure

(7.3.3) Comment

This year we are reporting Scope 2 emissions for the NOVAGOLD offices in both Salt Lake City and Vancouver. No electricity, steam, heat, or cooling was purchased by the Donlin Gold project in 2024. To calculate this we have used power usage and emissions data provided by building operators.
[Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

Select from:

☑ No

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

1565.0

(7.5.3) Methodological details

NOVAGOLD adheres to distinct definitions for GHG emissions categorized under Scope 1, Scope 2, and Scope 3. Scope 1 emissions, originating from direct sources owned or controlled by NOVAGOLD, primarily stem from fuel usage at the Donlin Gold project. Scope 1 emissions are calculated using a fuel-based methodology. Meanwhile, Scope 2 emissions, which arise indirectly from the generation of purchased energy, are exclusively measured for NOVAGOLD's corporate offices in Vancouver and Salt Lake City, where electricity consumption is drawn from the grid. Currently, NOVAGOLD comprehensively includes all emissions from the Donlin Gold project within its reporting boundaries. The Company calculates and discloses Scope 1 and Scope 2 emissions in accordance with current TCFD requirements. Scope 3 emissions, which pertain to indirect emissions from upstream and downstream activities, are not yet required and have not been measured. Given the remote nature of the Donlin Gold site, emissions are predominantly attributed to onsite diesel-fired power generation and heaters essential for project operations. Scope 1 emissions calculated also include those generated from diesel use in equipment and fuel for owned and controlled vehicles. Conversely, due to its grid-connected status, NOVAGOLD's offices in Salt Lake City and Vancouver report Scope 2 emissions from grid-supplied electricity. Emission levels fluctuate annually at Donlin Gold based on varying fieldwork and camp activities dictated by operational priorities set by the Donlin Gold LLC board. As the Company transitions to a new platform for measuring emissions, this may change for future disclosures, potentially encompassing additional Scope 3 emissions. This strategic approach ensures transparency in environmental impact assessments and aligns with NOVAGOLD's commitment to sustainable business practices.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

NOVAGOLD adheres to distinct definitions for GHG emissions categorized under Scope 1, Scope 2, and Scope 3. Scope 1 emissions, originating from direct sources owned or controlled by NOVAGOLD, primarily stem from fuel usage at the Donlin Gold project. Scope 1 emissions are calculated using a fuel-based methodology. Meanwhile, Scope 2 emissions, which arise indirectly from the generation of purchased energy, are measured for NOVAGOLD's corporate offices in Vancouver and Salt Lake City, where electricity is drawn from the grid. It is important to note that Scope 2 emissions were not calculated in the Company's base year; however, NOVAGOLD has since comprehensively included all emissions from the Donlin Gold project within its reporting boundaries. The Company adheres to current TCFD requirements by calculating and disclosing Scope 1 and Scope 2 emissions. Scope 3 emissions, which pertain to indirect emissions from upstream and downstream activities, are not currently mandatory for reporting and have not been measured to date. Given the remote nature of the Donlin Gold site, emissions are predominantly attributed to onsite diesel-fired power generation and heaters essential for project operations. Conversely, NOVAGOLD's grid-connected offices in Salt Lake City and Vancouver report Scope 2 emissions from grid-supplied electricity. Emission levels at Donlin Gold fluctuate annually based on the scale and timing of fieldwork and camp activities, which are influenced by operational priorities set by the Donlin Gold LLC board. As the Company transitions to a new emissions measurement platform, future disclosures may evolve to potentially include additional Scope 3 emissions. This strategic approach ensures transparency in environmental impact assessments and aligns with NOVAGOLD's commitment to sustainable business practices.
[Fixed row]

(7.6) What were your organization's gross global Scope 1 emissions in metric tons CO2e?

	Gross global Scope 1 emissions (metric tons CO2e)	End date	Methodological details
Reporting year	*38*	*Date input [must be between [11/19/2015 - 11/19/2024]*	*Scope 1 emissions, originating from direct sources owned or controlled by NOVAGOLD, primarily stem from fuel usage at the Donlin Gold project.*
Past year 1	*1235*	*12/31/2023*	*Scope 1 emissions, originating from direct sources owned or controlled by NOVAGOLD, primarily stem from fuel usage at the Donlin Gold project.*
Past year 2	*2633*	*12/31/2022*	*Scope 1 emissions, originating from direct sources owned or controlled by NOVAGOLD, primarily stem from fuel usage at the Donlin Gold project.*
Past year 3	*1084*	*12/31/2021*	*Scope 1 emissions, originating from direct sources owned or controlled by NOVAGOLD, primarily stem from fuel usage at the Donlin Gold project.*

	Gross global Scope 1 emissions (metric tons CO2e)	End date	Methodological details
Past year 4	*1565*	*12/31/2020*	*Scope 1 emissions, originating from direct sources owned or controlled by NOVAGOLD, primarily stem from fuel usage at the Donlin Gold project.*
Past year 5	*0*	*12/31/2019*	*N/A - Base year was 2020.*

[Fixed row]

(7.7) What were your organization's gross global Scope 2 emissions in metric tons CO2e?

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

18.62

(7.7.4) Methodological details

Scope 2 emissions which arise indirectly from the generation of purchased energy are exclusively measured for NOVAGOLDs corporate offices in Vancouver and Salt Lake City where electricity consumption is drawn from the grid. We have no operations where we are able to access electricity supplier emission factors or residual emissions factors and are unable to report a Scope 2 market- based figure. In 2024 we have further improved our Scope 2 emissions calculation methodologies, and data collection processes, resulting in updated emissions data for 2022 and 2023 which are lower than previously reported – 2022 (Recalculated figure: 24.15; previously reported figure: 34), 2023 (Recalculated figure: 24.44; previously reported figure: 219).

Past year 1

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

24.44

(7.7.3) End date

12/31/2023

(7.7.4) Methodological details

Scope 2 emissions which arise indirectly from the generation of purchased energy are exclusively measured for NOVAGOLDs corporate offices in Vancouver and Salt Lake City where electricity consumption is drawn from the grid. We have no operations where we can access electricity supplier emission factors or residual emissions factors and are unable to report a Scope 2 market- based figure. In 2024 we have further improved our Scope 2 emissions calculation methodologies, and data collection processes, resulting in updated emissions data for 2022 and 2023 which are lower than previously reported – 2022 (Recalculated figure: 24.15; previously reported figure: 34), 2023 (Recalculated figure: 24.44; previously reported figure: 219).

Past year 2

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

24.15

(7.7.3) End date

12/31/2022

(7.7.4) Methodological details

Scope 2 emissions which arise indirectly from the generation of purchased energy are exclusively measured for NOVAGOLDs corporate offices in Vancouver and Salt Lake City where electricity consumption is drawn from the grid. We have no operations where we can access electricity supplier emission factors or residual emissions factors and are unable to report a Scope 2 market- based figure. In 2024 we have further improved our Scope 2 emissions calculation methodologies, and data collection processes, resulting in updated emissions data for 2022 and 2023 which are lower than previously reported – 2022 (Recalculated figure: 24.15; previously reported figure: 34), 2023 (Recalculated figure: 24.44; previously reported figure: 219).

Past year 3

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

34

(7.7.3) End date

12/31/2021

(7.7.4) Methodological details

Scope 2 emissions which arise indirectly from the generation of purchased energy are exclusively measured for NOVAGOLDs corporate offices in Vancouver and Salt Lake City where electricity consumption is drawn from the grid. We have no operations where we can access electricity supplier emission factors or residual emissions factors and are unable to report a Scope 2 market- based figure.

Past year 4

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

0

(7.7.3) End date

12/31/2020

(7.7.4) Methodological details

Scope 2 emissions, which arise indirectly from the generation of purchased energy, are measured for NOVAGOLD's corporate offices in Vancouver and Salt Lake City where electricity is drawn from the grid. It is important to note that Scope 2 emissions were not calculated in our base year. However, since then, NOVAGOLD has comprehensively included all emissions from the Donlin Gold project within its reporting boundaries.

Past year 5

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

0

(7.7.3) End date

12/31/2019

(7.7.4) Methodological details

N/A - Base year 2020
[Fixed row]

(7.8) Account for your organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

(7.8.5) Please explain

The goods and services purchased are currently minimal. As the Donlin Gold project is in the permitting and development stage and the Company’s two offices are very small, with less than 10 employees in each office (Vancouver and Salt Lake City) our Scope 3 emissions are likely to be very small compared to mining companies with operating facilities. No construction decision has been made on the Donlin Gold project. Scope 3 emissions are not currently tracked but it is expected that these will be tracked following a construction decision as activity increases at the project site.

Capital goods

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

(7.8.5) Please explain

Capital goods are negligible at present. As the Donlin Gold project is in the permitting and development stage and the Company’s two offices are very small, our Scope 3 emissions are very small. No construction decision has been made for the Donlin Gold project Scope 3 emissions are not currently tracked but it is expected that these will be tracked following a construction decision as activity increases at the project site.

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

(7.8.5) Please explain

The majority of fuel and energy related emissions come under Scope 1 and 2 emissions at present. As we are still in the permitting and development stage and because both of our offices are very small, our Scope 3 emissions are very small. The Donlin Gold project is in the permitting/pre-construction phase of development. No construction decision has been made for the project. Scope 3 emissions are not currently tracked but it is expected that these will be tracked following a construction decision as activity increases at the project site.

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

(7.8.5) Please explain

As we are still in the permitting and development stage and both of our offices are very small, our Scope 3 emissions are likely to be very small. The Donlin Gold project is in the permitting/pre-construction phase of development. No construction decision has been made for the project. Scope 3 emissions are not currently tracked but it is expected that these will be tracked following a construction decision as activity increases at the project site.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

(7.8.5) Please explain

At present, minimal waste is produced on site. As we are still in the permitting and development stage and both of our offices are very small, our Scope 3 emissions are likely to be very small. The Donlin Gold project is in the permitting/pre-construction phase of development. No construction decision has been made for the project. Scope 3 emissions are not currently tracked but it is expected that these will be tracked following a construction decision as activity increases at the project site.

Business travel

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

(7.8.5) Please explain

As we are still in the permitting and development stage and both of our offices are very small, our Scope 3 emissions are likely to be very small. The Donlin Gold project is in the permitting/pre-construction phase of development. No construction decision has been made for the project. Scope 3 emissions are not currently tracked but it is expected that these will be tracked following a construction decision as activity increases at the project site.

Employee commuting

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

(7.8.5) Please explain

At present our team is small and there is minimal commuting. Our limited office staff work remotely most of the time. The Donlin Gold project site is only accessible by air, there is no traditional employee commuting. As we are still in the permitting and development stage and both of our offices are very small, our Scope 3 emissions are likely to be very small. The Donlin Gold project is in the permitting/ preconstruction phase of development. No construction decision has been made for the project Scope 3 emissions are not currently tracked but it is expected that these will be tracked following a construction decision as activity increases at the project site.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

NOVAGOLD does not have any Upstream leased assets to calculate Scope 3 emissions for.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

As a development stage company, NOVAGOLD does not produce any products. Therefore, no relevant emissions are identified for calculation in Downstream transpiration and distribution.

Processing of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

At present we do not produce anything, so no goods are sold. As we are still at the permitting and development stage and both of our offices are very small, our Scope 3 emissions are likely to be very small. The Donlin Gold project is in the permitting and development phase. No construction decision has been made for the project. Scope 3 emissions are not currently tracked but it is expected that these will be tracked following a construction decision as activity increases at the project site.

Use of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

The goods and services purchased are currently minimal. As the Donlin Gold project is in the permitting and development stage and the Company's two offices are very small, our Scope 3 emissions are likely to be very small. No construction decision has been made on the Donlin Gold project. Scope 3 emissions are not currently tracked but it is expected that these will be tracked following a construction decision as activity increases at the project site.

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

At present we do not produce anything, so no goods are sold. As we are still at the permitting and development stage and both of our offices are very small, our Scope 3 emissions are likely to be very small. No construction decision has been made for the project. Scope 3 emissions are not currently tracked but it is expected that these will be tracked following a construction decision as activity increases at the project. site.

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

(7.8.5) Please explain

As we are still at the permitting and development stage and both of our offices are very small, our Scope 3 emissions are likely to be very small. No construction decision has been made for the project. Scope 3 emissions are not currently tracked but it is expected that these will be tracked following a construction decision as activity increases at the project site.

Franchises

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

The Donlin Gold project is owned 50/50 by Barrick Mining. Donlin Gold operates on land owned by two Alaska Native Corporations, Calista and TKC, who own the subsurface and surface rights respectively. The project is in the permitting and development phase. No construction decision has been made for the project. Scope 3 emissions are not currently tracked but it is expected that these will be tracked following a construction decision as activity increases at the project site.

Investments

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

(7.8.5) Please explain

The Donlin Gold project is owned 50/50 by Barrick Mining and NOVAGOLD. Donlin Gold operates on land owned by two Alaska Native Corporations, Calista and TKC, who own the subsurface and surface rights respectively. The project is in the permitting and development stage. No construction decision has been made for the project. Scope 3 emissions are not currently tracked but it is expected that these will be tracked following a construction decision as activity increases at the project site.

Other (upstream)

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

(7.8.5) Please explain

N/A

Other (downstream)

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

(7.8.5) Please explain

N/A
[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	*Select from:* ☑ No third-party verification or assurance
Scope 2 (location-based or market-based)	*Select from:* ☑ No third-party verification or assurance
Scope 3	*Select from:* ☑ No emissions data provided

[Fixed row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:

☑ Decreased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Change in methodology

(7.10.1.1) Change in emissions (metric tons CO2e)

5.82

(7.10.1.2) Direction of change in emissions

Select from:

☑ Decreased

(7.10.1.3) Emissions value (percentage)

23.81

(7.10.1.4) Please explain calculation

The combined Scope 2 emissions from NOVAGOLDs offices in Salt Lake City and Vancouver in 2024 amounted to approximately 18.62 metric tonnes of CO2 -eq, in comparison to 24.44 metric tonnes of CO2 -eq in 2023. In 2024 we have further improved our Scope 2 emissions calculation methodologies, and data collection processes, resulting in recalculated 2022 and 2023 emissions which are lower than previously reported – 2022 (Recalculated figure: 24.15; previously reported figure: 34), 2023 (Recalculated figure: 24.44; previously reported figure: 219).
[Fixed row]

(7.12) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

Select from:

☑ No

(7.15) Does your organization break down its Scope 1 emissions by greenhouse gas type?

Select from:

☑ No

(7.16) Break down your total gross global Scope 1 and 2 emissions by country/area.

	Scope 1 emissions (metric tons CO2e)	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Canada	*0*	*9.31*	*0*
United States of America	*38*	*9.31*	*0*

[Fixed row]

(7.17) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

Select all that apply

☑ By facility

☑ By activity

(7.17.2) Break down your total gross global Scope 1 emissions by business facility.

Row 1

(7.17.2.1) Facility

Donlin Gold project

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

38

(7.17.2.3) Latitude

62.054167

(7.17.2.4) Longitude

158.183888
[Add row]

(7.17.3) Break down your total gross global Scope 1 emissions by business activity.

	Activity	Scope 1 emissions (metric tons CO2e)
Row 1	*Stationary diesel use*	*36*
Row 4	*Aviation Fuel*	*2*

[Add row]

(7.19) Break down your organization’s total gross global Scope 1 emissions by sector production activity in metric tons CO2e.

Metals and mining production activities

(7.19.1) Gross Scope 1 emissions, metric tons CO2e

0

(7.19.3) Comment

Not Applicable, the Donlin Gold project is in the permitting and development stage and does not have all permits to operate. No construction decision has been made and there is no current production. Hence, there are no emissions associated with the production activities.
[Fixed row]

(7.20) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

Select all that apply

☑ By business division

☑ By facility

(7.20.1) Break down your total gross global Scope 2 emissions by business division.

	Business division	Scope 2, location-based (metric tons CO2e)
Row 1	*NOVAGOLD*	*18.62*

[Add row]

(7.20.2) Break down your total gross global Scope 2 emissions by business facility.

	Facility	Scope 2, location-based (metric tons CO2e)
Row 1	*Vancouver Office*	*9.31*
Row 2	*Salt Lake City Office*	*9.31*

[Add row]

(7.21) Break down your organization’s total gross global Scope 2 emissions by sector production activity in metric tons CO2e.

Metals and mining production activities

(7.21.1) Scope 2, location-based, metric tons CO2e

0

(7.21.3) Comment

Not Applicable, the Donlin Gold project is in late stage permitting and preconstruction development and does not have all permits to operate. No construction decision has been made and there is no current production. Hence, there are no emissions associated with the production activities.
[Fixed row]

(7.22) Break down your gross Scope 1 and Scope 2 emissions between your consolidated accounting group and other entities included in your response.

All other entities

(7.22.1) Scope 1 emissions (metric tons CO2e)

38

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

18.62

(7.22.4) Please explain

Scope 1 emissions refer to direct emissions from sources owned or controlled by the company. NOVAGOLD's primary source of Scope 1 emissions is fuel consumption at the Donlin Gold project. Scope 2 emissions refer to indirect emissions from the generation of purchased electricity consumed by the company. NOVAGOLD's offices in Salt Lake City and Vancouver source their electricity from the local grid, resulting in Scope 2 emissions.
[Fixed row]

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from:

☑ Not relevant as we do not have any subsidiaries

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:
☑ More than 0% but less than or equal to 5%

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	*Select from:* ☑ Yes
Consumption of purchased or acquired electricity	*Select from:* ☑ Yes
Consumption of purchased or acquired heat	*Select from:* ☑ No
Consumption of purchased or acquired steam	*Select from:* ☑ No
Consumption of purchased or acquired cooling	*Select from:* ☑ No
Generation of electricity, heat, steam, or cooling	*Select from:* ☑ Yes

[Fixed row]

(7.30.1) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.

	Heating value	Total (renewable + non-renewable) MWh
Consumption of fuel (excluding feedstock)	*Select from:* ☑ Unable to confirm heating value	*Auto calculated*
Consumption of purchased or acquired electricity	*Select from:* ☑ Unable to confirm heating value	*Auto calculated*
Consumption of self-generated non-fuel renewable energy	*Select from:* ☑ Unable to confirm heating value	*0.00*
Total energy consumption	*Select from:* ☑ Unable to confirm heating value	*Auto calculated*

[Fixed row]

(7.30.4) Report your organization’s energy consumption totals (excluding feedstocks) for metals and mining production activities in MWh.

	Heating value	Total MWh
Consumption of fuel (excluding feedstocks)	*Select from:* ☑ Unable to confirm heating value	*0*
Consumption of purchased or acquired electricity	*Select from:* ☑ Unable to confirm heating value	*0*
Consumption of self-generated non-fuel renewable energy	*Select from:*	*0*

	Heating value	Total MWh
	☑ Unable to confirm heating value	
Total energy consumption	*Select from:* ☑ Unable to confirm heating value	*0*

[Fixed row]

(7.30.6) Select the applications of your organization's consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	*Select from:* ☑ Yes
Consumption of fuel for the generation of heat	*Select from:* ☑ No
Consumption of fuel for the generation of steam	*Select from:* ☑ No
Consumption of fuel for the generation of cooling	*Select from:* ☑ No
Consumption of fuel for co-generation or tri-generation	*Select from:* ☑ No

[Fixed row]

(7.30.7) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

	Heating value	Total fuel MWh consumed by the organization
Total fuel	*Select from:* ☑ Unable to confirm heating value	*69.56*

[Fixed row]

(7.30.9) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.

	Total Gross generation (MWh)
Electricity	*69.56*

[Fixed row]

(7.30.12) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed for metals and mining production activities.

	Total gross generation (MWh) inside metals and mining sector boundary	Generation that is consumed (MWh) inside metals and mining sector boundary
Electricity	*0*	*0*
Heat	*0*	*0*
Steam	*0*	*0*
Cooling	*0*	*0*

[Fixed row]

(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

Canada

(7.30.16.1) Consumption of purchased electricity (MWh)

35.32

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

35.32

United States of America

(7.30.16.1) Consumption of purchased electricity (MWh)

35.32

(7.30.16.2) Consumption of self-generated electricity (MWh)

69.56

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

104.88
[Fixed row]

(7.42) Provide details on the commodities relevant to the mining production activities of your organization.

Row 1

(7.42.1) Output product

Select from:
☑ Gold

(7.42.2) Capacity, metric tons

0

(7.42.3) Production, metric tons

0

(7.42.4) Production, copper-equivalent units (metric tons)

0

(7.42.5) Scope 1 emissions

0

(7.42.6) Scope 2 emissions

0

(7.42.8) Pricing methodology for copper-equivalent figure

N/A

(7.42.9) Comment

No decision has been made to construct the mine or production facility. Scope 1 emissions originating from direct sources owned or controlled by NOVAGOLD primarily stem from fuel usage at the Donlin Gold project
[Add row]

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.9) Please explain

The Donlin Gold project does not produce any products, as it remains in the permitting and pre-construction phase. Consequently, no revenue is currently being generated.
[Add row]

(7.52) Provide any additional climate-related metrics relevant to your business.

Row 1

(7.52.1) Description

Select from:
☑ Waste

(7.52.2) Metric value

0

(7.52.3) Metric numerator

N/A

(7.52.4) Metric denominator (intensity metric only)

N/A

(7.52.5) % change from previous year

100

(7.52.6) Direction of change

Select from:
☑ Decreased

(7.52.7) Please explain

In 2024, with the exploration camp closed, waste generation was de minimis at Donlin Gold. We anticipate future waste generation to be higher than 2024, and Donlin Gold remains committed to exploring additional ways to minimize waste generation and enhance recycling activities.
[Add row]

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply
☑ No target

(7.53.3) Explain why you did not have an emissions target, and forecast how your emissions will change over the next five years.

(7.53.3.1) Primary reason

Select from:
☑ Other, please specify :Not feasible or appropriate given our very low level of emissions.

(7.53.3.2) Five-year forecast

Regarding emissions targets and future projections: As a prerequisite for environmental leadership, it's important to explain why emissions targets are not currently in place and to forecast how emissions will evolve over the next five years. Given the project's developmental stage, setting specific targets for emissions reduction or water use is challenging and not currently a priority. Annual performance metrics will reflect these changes. Looking ahead, as exploration, development, and construction activities expand, emissions are expected to increase due to rising personnel and operational activities. NOVAGOLD plans to implement international best practices and industry standards, and to enhance our reporting as the project advances towards construction and operational phases.

(7.53.3.3) Please explain

NOVAGOLD has taken a pragmatic approach to disclosing our ESG performance as a company in the development stage. Our disclosures focus on benchmarks that we consider the most relevant measurements of our performance rather than strict targets. The completion of federal permitting for the Donlin Gold project in 2018 marked a significant milestone, propelling NOVAGOLD into a new phase of ESG reporting amid heightened interest from stakeholders. Looking ahead, as exploration, development, and construction activities expand, emissions are expected to increase due to rising personnel and operational activities. NOVAGOLD collaborated with Barrick Mining in 2024 to implement certain international best practices and industry standards. We plan to enhance our reporting as the project advances toward the construction and operational phases, which are inherently emission-intensive. This year, we have once again released our annual Sustainability Report and Sustainability Summary, providing key data sheets that highlight our progress. Additionally, we have published a corporate Climate Change Policy and are

in the process of developing specific targets within this framework. We are committed to increasing transparency and accountability by continuously improving the suite of ESG metrics disclosed to our stakeholders.
[Fixed row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply
☑ No other climate-related targets

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Select from:
☑ No

(7.55.4) Why did you not have any emissions reduction initiatives active during the reporting year?

NOVAGOLD takes a pragmatic and stage-appropriate approach to disclosing our ESG performance. As a development-stage company, we focus on benchmarking our progress rather than setting long-term operational targets that may not yet be applicable. The completion of federal permitting for the Donlin Gold project in 2018 marked a significant milestone, signaling a transition to a more advanced phase of ESG reporting in response to increasing stakeholder interest. In alignment with our commitment to transparency and responsible development, we published a suite of sustainability disclosures in the current reporting year, including our annual Sustainability Report, a standalone Sustainability Summary Report, and a report aligned with the recommendations of the TCFD. These reports provide insights into our ESG strategy, data collection efforts, and climate-related risks and opportunities. In 2023, we introduced a corporate Climate Change Policy to strengthen our sustainability commitments and to formalize our approach to managing climate-related impacts and through our project partnership with Barrick Mining, we collaborated closely to implement international best practices and industry standards at the jointly owned Donlin Gold project. As the Donlin Gold project advances toward potential construction and eventual operations, NOVAGOLD is working to implement certain international best practices and align with industry standards for environmental management and emissions reporting. We are preparing to expand our disclosures as project activities increase in scale, with particular focus on areas including crisis and emergency preparedness, stakeholder engagement on environmental protection, the formation of regional advisory committees, and partnerships with local organizations in the Y-K region. These efforts support sustainable development in environmental conservation, education, and health and safety. The evolution of the project from exploration to potential development brings significant implications for climate-related strategy. Current site activities depend on diesel-fired power generation due to the project's remote location. As we progress, we are committed to evaluating the feasibility of incorporating renewable energy sources—such as solar or wind power—to reduce emissions intensity and improve energy sustainability at the site.

(7.74) Do you classify any of your existing goods and/or services as low-carbon products?

Select from:

☑ No

(7.79) Has your organization retired any project-based carbon credits within the reporting year?

Select from:

☑ No

C9. Environmental performance - Water security

(9.1) Are there any exclusions from your disclosure of water-related data?

Select from:
☑ No

(9.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?

Water withdrawals – total volumes

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Quarterly

(9.2.3) Method of measurement

At the Donlin Gold project site, water withdrawals are monitored using a meter on our Potable Water System, which tracks water flow in gallons.

(9.2.4) Please explain

Donlin Gold and NOVAGOLD monitor and manage their annual water consumption. In 2024, the Donlin Gold project utilized approximately 4,095 gallons of pumped groundwater to support camp operations. Located in a remote area of western Alaska with minimal competing water users, water scarcity has not been an issue. All water withdrawals are authorized by the State of Alaska, ensuring protection of local water resources and preventing adverse impacts on streams and aquatic life. Additionally, since 2021, water usage has been tracked at both the Vancouver and Salt Lake City offices. Total withdrawals for 2024 were approximately 150,050 gallons, sourced from municipal water systems and primarily recycled into the environment.

Water withdrawals – volumes by source

(9.2.1) % of sites/facilities/operations

Select from:

☑ 26-50

(9.2.2) Frequency of measurement

Select from:

☑ Yearly

(9.2.3) Method of measurement

See explanation on water withdrawals

(9.2.4) Please explain

We do not have specific source information for the minimal water use at our NOVAGOLD offices, as they are supplied by large public water systems. These systems draw from multiple water bodies to meet their needs.

Entrained water associated with your metals & mining and/or coal sector activities - total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not relevant

(9.2.4) Please explain

This is not applicable as the Donlin Gold project is not yet a producing mine.

Water withdrawals quality

(9.2.1) % of sites/facilities/operations

Select from:

☑ 26-50

(9.2.2) Frequency of measurement

Select from:

☑ Quarterly

(9.2.3) Method of measurement

See explanation of water withdrawals

(9.2.4) Please explain

All withdrawals at the Donlin Gold site are fully permitted. The water is monitored to ensure it meets drinking water quality standards, as it is used for various purposes, including domestic water supply. We do not measure the quality of water at our NOVAGOLD offices directly; however, it is assumed to be high quality because it is part of the broader public water supply system in the area, which is considered safe to drink and is monitored by relevant officials.

Water discharges – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Quarterly

(9.2.3) Method of measurement

Discharge volumes are tracked as per permit requirements at the Donlin Gold project site.

(9.2.4) Please explain

Federal and State permits are in hand for Donlin Gold that manage all water use and water quality standards and take into account proper discharge and return to the environment after use. At the Donlin Gold site, water withdrawals are monitored using a meter on our Potable Water System, which tracks water flow in gallons. Discharge volumes are tracked as per permit requirements. Detailed operating and monitoring plans and policies have been established for and implemented at the Donlin Gold project site that address safe drinking water and sanitary wastewater systems stormwater management spill prevention and control fuel oil and hazardous materials management wetlands protection wildlife interactions and many others.

Water discharges – volumes by destination

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Quarterly

(9.2.3) Method of measurement

Discharge volumes are tracked as per permit requirements at the Donlin Gold project site.

(9.2.4) Please explain

Federal and State permits are in hand for Donlin Gold that manage all water use and water quality standards and take into account proper discharge and return to the environment after use. At the Donlin Gold site, water withdrawals are monitored using a meter on our Potable Water System, which tracks water flow in gallons. Discharge volumes are tracked as per permit requirements. Detailed operating and monitoring plans and policies have been established for and implemented at the Donlin Gold project site that address safe drinking water and sanitary wastewater systems stormwater management spill prevention and control fuel oil and hazardous materials management wetlands protection wildlife interactions and many others.

Water discharges – volumes by treatment method

(9.2.1) % of sites/facilities/operations

Select from:

☑ 26-50

(9.2.2) Frequency of measurement

Select from:

☑ Quarterly

(9.2.3) Method of measurement

Discharge volumes are tracked as per permit requirements at the Donlin Gold project site.

(9.2.4) Please explain

This is only measured at Donlin Gold. When the project site is occupied during seasonal exploration operations, the environmental team conduct daily inspections of all ongoing site activities as well as monitoring for potential releases to land and water. These areas include water and wastewater management, air quality, hazardous and other solid waste management, fuel storage and use (and associated spill risk), and the protection of biological resources around the site. Donlin Gold and its contractors have never been cited for any non-compliance with environmental regulations, standards, or permit requirements related to impacts on water resources.

Water discharge quality – by standard effluent parameters

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not relevant

(9.2.4) Please explain

N/A

Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not relevant

(9.2.4) Please explain

N/A

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not monitored

(9.2.4) Please explain

No heating or cooling of water is carried out during our operations; though this is monitored, no "heating" of the water is anticipated in the facility operations even in the future.

Water consumption – total volume

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Quarterly

(9.2.3) Method of measurement

At the Donlin Gold project site, water consumption for camp activities are monitored using a meter on our Potable Water System, which tracks water flow in gallons.

(9.2.4) Please explain

At Donlin Gold all withdrawals and discharges are monitored. Consumption is essentially zero as all water is appropriately treated and then returned to the environment as per water permits. Since 2021 we have also measured water use at both the Vancouver and Salt Lake City offices and essentially all of this water returns to the environment.

Water recycled/reused

(9.2.1) % of sites/facilities/operations

Select from:

☑ 26-50

(9.2.2) Frequency of measurement

Select from:

☑ Quarterly

(9.2.3) Method of measurement

See explanation for Water Recycled/Reused

(9.2.4) Please explain

This is not measured at NOVAGOLD offices. in Salt Lake City and Vancouver.

The provision of fully-functioning, safely managed WASH services to all workers

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

See explanation for the provision of fully-functioning, safely managed WASH services to all workers.

(9.2.4) Please explain

Detailed operating and monitoring plans and policies have been established for and implemented at the Donlin Gold project site that address safe drinking water and sanitary wastewater systems. This also applies for all NOVAGOLD office locations in Canada and the United States.
[Fixed row]

(9.2.2) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?

Total withdrawals

(9.2.2.1) Volume (megaliters/year)

0.58

(9.2.2.2) Comparison with previous reporting year

Select from:
☑ Lower

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in business activity

(9.2.2.4) Five-year forecast

Select from:
☑ Higher

(9.2.2.5) Primary reason for forecast

Select from:

☑ Increase/decrease in business activity

(9.2.2.6) Please explain

Water usage at the Donlin Gold project site varies annually based on operational needs such as domestic supply, core cutting, and equipment and facility washdowns. While water use has remained limited during the pre-development phase, it is expected to increase in 2025 in response to growing business activity and the progression toward development, construction, and full operation. All water withdrawals and uses are authorized by the State of Alaska, which is intended to ensure the protection of local water resources and preventing adverse impacts on streams and aquatic life. Additionally, the permitting process prioritizes water conservation through reuse strategies, which will help minimize the need for additional water supply as operations scale up.

Total discharges

(9.2.2.1) Volume (megaliters/year)

0.02

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.2.4) Five-year forecast

Select from:

☑ Higher

(9.2.2.5) Primary reason for forecast

Select from:

☑ Increase/decrease in business activity

(9.2.2.6) Please explain

Water usage at the Donlin Gold Project site varies annually based on operational needs such as domestic supply, core cutting, and equipment and facility washdowns. While water use has remained limited during the pre-development phase, it is expected to increase in 2025 in response to growing business activity and the progression toward development, construction, and full operations. All water withdrawals and uses are authorized by the State of Alaska, ensuring the protection of local water resources and preventing adverse impacts on streams and aquatic life. Additionally, the permitting process prioritizes water conservation through reuse strategies, which will help minimize the need for additional water supply as operations scale up.

Total consumption

(9.2.2.1) Volume (megaliters/year)

0

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ About the same

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Unknown

(9.2.2.4) Five-year forecast

Select from:

☑ Unknown

(9.2.2.5) Primary reason for forecast

Select from:

☑ Unknown

(9.2.2.6) Please explain

All water that is withdrawn is returned to the environment.
[Fixed row]

(9.2.4) Indicate whether water is withdrawn from areas with water stress, provide the volume, how it compares with the previous reporting year, and how it is forecasted to change.

	Withdrawals are from areas with water stress	Identification tool	Please explain
	Select from: ☑ No	*Select all that apply* ☑ Other, please specify :No formal identification tool used	*With the project site's current minimal water uses and abundant supplies in the region, water scarcity is not a current concern.*

[Fixed row]

(9.2.7) Provide total water withdrawal data by source.

Fresh surface water, including rainwater, water from wetlands, rivers, and lakes

(9.2.7.1) Relevance

Select from:
☑ Relevant but volume unknown

(9.2.7.5) Please explain

Extremely small volumes are very occasionally used for drilling operations. All water is fully recycled, treated as needed, and ultimately returned to the natural water system.

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

N/A

Groundwater – renewable

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

0.02

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.7.5) Please explain

Water usage at the Donlin Gold project site, like the variable GHG emissions, fluctuates annually based on factors such as domestic supply, core cutting, and equipment and facility washdowns. In 2024, the combined groundwater usage for the Donlin Gold project and NOVAGOLD was approximately 154,000 gallons, a decrease from 2023. This reduction was primarily due to limited field activity in 2024, which led to lower water demands. Notably, nearly all of the water used was recycled back into the environment.

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

N/A

Produced/Entrained water

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

N/A

Third party sources

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

0.57

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.7.5) Please explain

The reported figure reflects NOVAGOLD's office water withdrawals, derived from usage in both the Salt Lake City and Vancouver offices. Water usage can vary annually based on office activity levels, and the increase in 2024 is attributed to higher in-office activity compared to the previous year.
[Fixed row]

(9.2.8) Provide total water discharge data by destination.

Fresh surface water

(9.2.8.1) Relevance

Select from:

☑ Relevant but volume unknown

(9.2.8.5) Please explain

Extremely small volumes are very occasionally used for drilling operations. All water is fully recycled, treated as needed, and ultimately returned to the natural water system.

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:

☑ Not relevant

(9.2.8.5) Please explain

N/A

Groundwater

(9.2.8.1) Relevance

Select from:

☑ Relevant

(9.2.8.2) Volume (megaliters/year)

0.02

(9.2.8.3) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.8.5) Please explain

Water usage at the Donlin Gold project site, like the variable GHG emissions, fluctuates annually based on factors such as domestic supply, core cutting, and equipment and facility washdowns. In 2024, the combined groundwater usage for the Donlin Gold project and NOVAGOLD was approximately 154,000 gallons, a decrease from 2023. This reduction was primarily due to limited field activity in 2024, which led to lower water demands. Notably, nearly all of the water used was recycled back into the environment.

Third-party destinations

(9.2.8.1) Relevance

Select from:

☑ Relevant

(9.2.8.2) Volume (megaliters/year)

0.57

(9.2.8.3) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.8.5) Please explain

The reported figure reflects NOVAGOLD's office water withdrawals, derived from usage in both the Salt Lake City and Vancouver offices. Water usage can vary annually based on office activity levels, and the increase in 2024 is attributed to higher in-office activity compared to the previous year.
[Fixed row]

(9.2.9) Within your direct operations, indicate the highest level(s) to which you treat your discharge.

Tertiary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

N/A

Secondary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Relevant

(9.2.9.2) Volume (megaliters/year)

0.02

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☑ Lower

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☑ 100%

(9.2.9.6) Please explain

As per permit requirements, water used on site at Donlin Gold goes through treatment before being discharged. In addition to secondary treatment with two-step filtration, downstream groundwater is monitored to ensure water quality standards are met or exceeded.

Primary treatment only

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

N/A

Discharge to the natural environment without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

N/A

Discharge to a third party without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Relevant

(9.2.9.2) Volume (megaliters/year)

0.57

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☑ Higher

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☑ 21-30

(9.2.9.6) Please explain

Starting in 2021, we began monitoring water use at both the Vancouver and Salt Lake City offices. In 2024, total water withdrawals at these offices were approximately 150,000 US gallons, reflecting an increase from the previous year due to increased in-office activity. This water is used for various office purposes, and its discharge is managed by third-party municipal water treatment services. These services ensure that the wastewater is treated according to local regulations and standards before being safely released from the municipal system.

Other

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

N/A
[Fixed row]

(9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?

Direct operations

(9.3.1) Identification of facilities in the value chain stage

Select from:

☑ No, we have not assessed this value chain stage for facilities with water-related dependencies, impacts, risks, and opportunities, and are not planning to do so in the next 2 years

(9.3.4) Please explain

The project remains in the permitting and development stage and continues to progress through the permitting process, which began in 2012. NOVAGOLD has been involved in the project for over 20 years. While federal permits were secured in 2018 and most key state permits have been obtained, several additional permits are still required before operations can begin. No construction decisions have been made to date. Project site work in remote western Alaska remains intermittent and seasonal, occurring only during ice-free months and based on evolving development priorities. A major drilling program was last conducted in 2022, supported by contractors and project staff. In contrast, there was no diamond drilling activity in either 2023 or 2024. Recent summer fieldwork has typically consisted of small teams conducting routine maintenance and site support activities. Due to the variability in site activity, water use measurement standards and methodologies are still being developed and refined. Third-party verification of these metrics has not yet been conducted.

Upstream value chain

(9.3.1) Identification of facilities in the value chain stage

Select from:

☑ No, we have not assessed this value chain stage for facilities with water-related dependencies, impacts, risks, and opportunities, but we are planning to do so in the next 2 years

(9.3.4) Please explain

The project remains in the permitting and development stage and continues to progress through the permitting process, which began in 2012. NOVAGOLD has been involved in the project for over 20 years. While federal permits were secured in 2018 and most key state permits have been obtained, several additional permits are still required before operations can begin. No construction decisions have been made to date. Project site work in remote western Alaska remains intermittent and seasonal, occurring only during ice-free months and based on evolving development priorities. A major drilling program was last conducted in 2022, supported by contractors and project staff. In contrast, there was no diamond drilling activity in either 2023 or 2024. Recent summer fieldwork has typically consisted of small teams

conducting routine maintenance and site support activities. Due to the variability in site activity, water use measurement standards and methodologies are still being developed and refined. Third-party verification of these metrics has not yet been conducted.
[Fixed row]

(9.5) Provide a figure for your organization's total water withdrawal efficiency.

	Revenue (currency)	Total water withdrawal efficiency	Anticipated forward trend
	0	*0.00*	*N/A as no revenue is generated at NOVAGOLD from operational activities*

[Fixed row]

(9.10) Do you calculate water intensity information for your metals and mining activities?

Select from:
☑ No, and we have no plans to do so in the next two years

(9.13) Do any of your products contain substances classified as hazardous by a regulatory authority?

	Products contain hazardous substances	Comment
	Select from: ☑ No	*The Donlin Gold project does not produce any products as it is still in its permitting and development phase.*

[Fixed row]

(9.14) Do you classify any of your current products and/or services as low water impact?

(9.14.1) Products and/or services classified as low water impact

Select from:

☑ No, and we do not plan to address this within the next two years

(9.14.3) Primary reason for not classifying any of your current products and/or services as low water impact

Select from:

☑ Important but not an immediate business priority

(9.14.4) Please explain

NOVAGOLD does not currently produce any products. The Donlin Gold project is in the pre-construction stage and is still undergoing the permitting process, which began in 2012. NOVAGOLD has been involved in the project for over 20 years. Although federal permits were secured in 2018 and significant state permits have been obtained, additional permits are still required before operations can commence. Since no construction decision has been finalized, the exact water impacts cannot be determined with certainty at this stage. Given the industry's current rapid transformations, predicting our water impact relative to competitors remains challenging. Nevertheless, we are committed to implementing best practices and striving to minimize our water impact as much as possible.
[Fixed row]

(9.15) Do you have any water-related targets?

Select from:

☑ Yes

(9.15.1) Indicate whether you have targets relating to water pollution, water withdrawals, WASH, or other water-related categories.

Water pollution

(9.15.1.1) Target set in this category

Select from:

☑ Yes

Water withdrawals

(9.15.1.1) Target set in this category

Select from:

☑ No, and we do not plan to within the next two years

(9.15.1.2) Please explain

Donlin Gold and NOVAGOLD track and manage their annual water use. The project site is located in a remote part of western Alaska where there are few other water users and water scarcity has not been a concern. In addition, all water withdrawals and uses are authorized by the State of Alaska. This process provides for protection of other local water uses which is intended to ensure no adverse impacts to streams and aquatic life use.

Water, Sanitation, and Hygiene (WASH) services

(9.15.1.1) Target set in this category

Select from:

☑ Yes

Other

(9.15.1.1) Target set in this category

Select from:

☑ Yes

[Fixed row]

(9.15.2) Provide details of your water-related targets and the progress made.

Row 1

(9.15.2.1) Target reference number

Select from:

☑ Target 1

(9.15.2.2) Target coverage

Select from:

☑ Site/facility

(9.15.2.3) Category of target & Quantitative metric

Other

☑ Other, please specify :Water recycling/reuse

(9.15.2.4) Date target was set

01/01/2021

(9.15.2.5) End date of base year

12/31/2021

(9.15.2.6) Base year figure

0

(9.15.2.7) End date of target year

12/31/2021

(9.15.2.8) Target year figure

0

(9.15.2.9) Reporting year figure

0

(9.15.2.10) Target status in reporting year

Select from:

☑ Achieved

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ None, alignment not assessed

(9.15.2.13) Explain target coverage and identify any exclusions

We prioritize ensuring that all water returns to the natural system at an appropriate quality. This is an ongoing, yearly commitment, not a one-time target. We encourage everyone to continuously minimize water use and practice good water stewardship. All used water is consistently and properly treated before being returned to the environment, reflecting our dedication to sustainable water management year after year.

(9.15.2.15) Actions which contributed most to achieving or maintaining this target

To minimize environmental impacts, the Donlin Gold project site has implemented detailed operating and monitoring plans and policies, addressing various aspects such as safe drinking water; sanitary wastewater systems; stormwater management; spill prevention and control; fuel, oil, and hazardous materials management; wetlands protection; wildlife interactions; and more

Row 2

(9.15.2.1) Target reference number

Select from:

☑ Target 1

(9.15.2.2) Target coverage

Select from:

☑ Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Water pollution

☑ Other water pollution, please specify :Zero Hazardous Material Spills to Water

(9.15.2.4) Date target was set

01/01/2021

(9.15.2.5) End date of base year

12/31/2021

(9.15.2.6) Base year figure

0.0

(9.15.2.7) End date of target year

12/31/2021

(9.15.2.8) Target year figure

0

(9.15.2.9) Reporting year figure

0

(9.15.2.10) Target status in reporting year

Select from:

☑ Achieved

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ None, alignment not assessed

(9.15.2.13) Explain target coverage and identify any exclusions

NOVAGOLD, consistent with its policies, sets annual environmental targets for spills at project sites. In 2024 our goal of no spills to water and no spills of ten gallons or more to land at any project sites or offices was achieved. Specifically, there were no spills requiring immediate reporting to government agencies, and all of the small spills to land were promptly and fully remediated in accordance with Donlin Gold policies, leaving no trace on or below the ground surface. This target is set and recurs annually.

(9.15.2.15) Actions which contributed most to achieving or maintaining this target

To minimize environmental impacts, the Donlin Gold project site has implemented detailed operating and monitoring plans and policies, addressing various aspects such as safe drinking water; sanitary wastewater systems; stormwater management; spill prevention and control; fuel, oil, and hazardous materials management; wetlands protection; wildlife interactions; and more

Row 3

(9.15.2.1) Target reference number

Select from:

☑ Target 2

(9.15.2.2) Target coverage

Select from:

☑ Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Water pollution

☑ Other water pollution, please specify :Zero Spills of 10 gallons or more to land

(9.15.2.4) Date target was set

01/01/2021

(9.15.2.5) End date of base year

12/31/2021

(9.15.2.6) Base year figure

0

(9.15.2.7) End date of target year

12/31/2021

(9.15.2.8) Target year figure

0

(9.15.2.9) Reporting year figure

0

(9.15.2.10) Target status in reporting year

Select from:
☑ Achieved

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply
☑ None, alignment not assessed

(9.15.2.13) Explain target coverage and identify any exclusions

NOVAGOLD, consistent with its policies, sets annual environmental targets for spills at project sites. In 2024 our goal of no spills to water and no spills of ten gallons or more to land at any project sites or offices was achieved. Specifically, there were no spills requiring immediate reporting to government agencies and all of the small spills to land were promptly and fully remediated in accordance with Donlin Gold policies leaving no trace on or below the ground surface. This is an ongoing, yearly commitment, not a one-time target.

(9.15.2.15) Actions which contributed most to achieving or maintaining this target

To minimize environmental impacts, the Donlin Gold project site has implemented detailed operating and monitoring plans and policies, addressing various aspects such as safe drinking water; sanitary wastewater systems; stormwater management; spill prevention and control; fuel, oil, and hazardous materials management; wetlands protection; wildlife interactions; and more
[Add row]

C11. Environmental performance - Biodiversity

(11.1) Within your reporting boundary, are there any geographical areas, business units or mining projects excluded from your disclosure?

Select from:
☑ No

(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

(11.2.1) Actions taken in the reporting period to progress your biodiversity-related commitments

Select from:
☑ Yes, we are taking actions to progress our biodiversity-related commitments

(11.2.2) Type of action taken to progress biodiversity- related commitments

Select all that apply
☑ Land/water protection
☑ Land/water management
☑ Species management
☑ Education & awareness
☑ Livelihood, economic & other incentives
[Fixed row]

(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
	Select from: ☑ Yes, we use indicators	*Select all that apply* ☑ State and benefit indicators

[Fixed row]

(11.4) Does your organization have activities located in or near to areas important for biodiversity in the reporting year?

Legally protected areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:
☑ No

(11.4.2) Comment

N/A

UNESCO World Heritage sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:
☑ No

(11.4.2) Comment

N/A

UNESCO Man and the Biosphere Reserves

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:
☑ No

(11.4.2) Comment

N/A

Ramsar sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:
☑ No

(11.4.2) Comment

N/A

Key Biodiversity Areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:
☑ No

(11.4.2) Comment

N/A

Other areas important for biodiversity

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ Yes

(11.4.2) Comment

NOVAGOLD's project area does not include any formally identified Key Biodiversity Areas, and there are no threatened or endangered species habitats within our camp area. For the full-scale project, we are aware that spectacled and Steller's eiders' habitats are located along the river barging route, but these habitats will not be impacted by our project. In 2023, NOVAGOLD began implementing its Biodiversity Policy and developing a Biodiversity Action Plan focused on key indicator species, particularly salmon, which are important to regional communities and currently facing declining returns. In 2024, Donlin Gold continued implementation of the Aquatic Resources Monitoring Plan (ARMP), collecting aquatic species and habitat data to establish baseline conditions for future comparison during mine operations. Donlin Gold also increased aquatic habitat in the Crooked Creek drainage to further support the local ecosystem. Since mid-2023, we have worked closely with Calista and TKC on salmon fisheries monitoring and engagement across the Kuskokwim and Yukon River watersheds. A key initiative in 2024 was the launch of a pilot project on the George River, a Kuskokwim tributary near Crooked Creek, to test methods for monitoring juvenile salmon outmigration. In collaboration with the Native Village of Napaimute, fish traps and monitoring equipment were installed, with the program continuing into 2025 to cover the full smolt migration season from mid-April through late June. Also in 2024, under the ARMP, NOVAGOLD re-initiated baseline aquatic monitoring in the Crooked Creek watershed, including studies of salmon and resident fish, macroinvertebrates, periphyton, and quarterly water sampling. High flows prevented biomonitoring in July. Additional efforts focused on sediment and fish tissue sampling to characterize pre-mining conditions. A fish habitat restoration project initiated in 2021 to improve fish access in areas affected by historic placer mining reached a major milestone in 2024 with restored areas reconnected to Crooked Creek. Monitoring began and showed early signs of success. Further enhancement of the Snow Gulch inlet channel is planned for 2025. Since 2015, Donlin Gold has monitored Rainbow Smelt spawning near Kalskag—an important spring subsistence species. Monitoring continued in 2024, building on prior work, to inform future assessment of potential barging impacts, which the EIS concluded would be minimal.
[Fixed row]

(11.4.1) Provide details of your organization's activities in the reporting year located in or near to areas important for biodiversity.

Row 1

(11.4.1.1) Mining project ID

Select from:

☑ Project 1

(11.4.1.2) Types of area important for biodiversity

Select all that apply

☑ Other areas important for biodiversity

(11.4.1.4) Country/area

Select from:

☑ United States of America

(11.4.1.5) Name of the area important for biodiversity

Crooked Creek Watershed

(11.4.1.6) Proximity

Select from:

☑ Adjacent

(11.4.1.8) Briefly describe your organization's activities in the reporting year located in or near to the selected area

NOVAGOLD began implementing its Biodiversity Policy in 2023 and initiated development of a Biodiversity Action Plan focused on species of concern, particularly key indicator species such as salmon, which are vital to regional communities and are experiencing declining returns. The Donlin Gold project is located in an area of ecological significance, including the Crooked Creek watershed. In 2024, Donlin Gold continued implementing the Aquatic Resources Monitoring Plan (ARMP), collecting data on aquatic species and habitats to establish a baseline for future comparison during mine operations. Donlin Gold also expanded aquatic habitat in the Crooked Creek drainage to further support the local ecosystem. As part of the ARMP, NOVAGOLD re-initiated baseline aquatic monitoring in 2024, including comprehensive assessments of salmon and other fish populations, macroinvertebrates, and periphyton. Quarterly water sampling was conducted in March, May, September, and October, although high flows in July prevented biomonitoring during that period. Additional sampling focused on sediment and fish tissue quality to help characterize pre-mining environmental conditions. Planning is underway for expanded monitoring under the ARMP in 2026, which will build on over 20 years of

collected data. In parallel, Donlin Gold has advanced a fish habitat restoration project in the Crooked Creek watershed that began in 2021, aimed at improving habitat connectivity and access for resident fish in areas impacted by historic placer mining. In 2024, restored areas were opened to fish access, and initial monitoring indicated early signs of success. Building on this momentum, Donlin Gold is planning further development of the Snow Gulch inlet channel in 2025 to enhance natural habitat conditions and better support aquatic life in the region.

(11.4.1.9) Indicate whether any of your organization's activities located in or near to the selected area could negatively affect biodiversity

Select from:

☑ Yes, but mitigation measures have been implemented

(11.4.1.10) Mitigation measures implemented within the selected area

Select all that apply

☑ Restoration

(11.4.1.11) Explain how your organization's activities located in or near to the selected area could negatively affect biodiversity, how this was assessed, and describe any mitigation measures implemented

NOVAGOLD's proposed activities would include some unavoidable, limited reduction in habitat. However, NOVAGOLD has implemented several measures to mitigate the impact of its activities on the Crooked Creek watershed. These measures include habitat protection and restoration efforts to restore pre-mining hydrologic conditions and enhance fish habitats, alongside regular monitoring of fish populations and water quality to ensure ecosystem health. The company collaborates with local organizations and Indigenous communities, such as the Kuskokwim Watershed Council and the Native Village of Napaimute, to integrate traditional knowledge into its conservation efforts. Additionally, NOVAGOLD employs adaptive management practices to adjust mitigation strategies based on monitoring results and feedback, ensuring continuous improvement in biodiversity protection.

Row 2

(11.4.1.1) Mining project ID

Select from:

☑ Project 1

(11.4.1.2) Types of area important for biodiversity

Select all that apply

☑ Other areas important for biodiversity

(11.4.1.4) Country/area

Select from:

☑ United States of America

(11.4.1.5) Name of the area important for biodiversity

Middle Kuskokwim River

(11.4.1.6) Proximity

Select from:

☑ Adjacent

(11.4.1.8) Briefly describe your organization's activities in the reporting year located in or near to the selected area

In 2023, NOVAGOLD and Donlin Gold strengthened collaboration with Calista and The TKC to support salmon fisheries in the Kuskokwim and Yukon River watersheds. Early efforts focused on identifying opportunities to monitor and evaluate salmon populations. That same year, Donlin Gold expanded investigations into the Middle Kuskokwim River to study baseline populations and spawning behavior of rainbow smelt, a key spring subsistence species. Over the past decade, Donlin Gold has led sustained efforts to identify rainbow smelt spawning locations and migration timing—marking a first of its kind in the Yukon-Kuskokwim region. In 2023, this work was enhanced through hydrodynamic surveys to map shallow areas where smelt eggs may be deposited, helping ensure these habitats are not affected by future barging activities. Conducted in collaboration with local subsistence users, the data will play a key role in confirming that river transportation will not adversely impact smelt or their role in community food systems. In 2024, a major milestone was the launch of a pilot project on the George River, a Kuskokwim tributary about 15 miles east of Crooked Creek, aimed at testing methods to monitor juvenile salmon outmigration. In partnership with the Native Village of Napaimute, fish traps and equipment were delivered and installed to support the research. This project will continue into 2025, expanding to capture the full smolt migration season from mid-April through late June, following river break-up. Donlin Gold, Napaimute, and contractor teams will collect data throughout the season. These efforts reflect a broader commitment to understanding and protecting regional fish populations and biodiversity. Looking ahead, NOVAGOLD and Donlin Gold will continue engaging with regional stakeholders to support collaborative, science-based approaches to biodiversity and fisheries monitoring, both near the project site and across the wider Kuskokwim River watershed.

(11.4.1.9) Indicate whether any of your organization's activities located in or near to the selected area could negatively affect biodiversity

Select from:

☑ Yes, but mitigation measures have been implemented

(11.4.1.10) Mitigation measures implemented within the selected area

Select all that apply

☑ Other, please specify :Conducting hydrodynamic surveys to map shallow areas in the river to ensure that rainbow smelt eggs will not be affected by barging activities.

(11.4.1.11) Explain how your organization's activities located in or near to the selected area could negatively affect biodiversity, how this was assessed, and describe any mitigation measures implemented

In 2023, NOVAGOLD and Donlin Gold strengthened collaboration with Calista and TKC to support salmon fisheries in the Kuskokwim and Yukon River watersheds. Early efforts focused on identifying opportunities to monitor and evaluate salmon populations. That same year, Donlin Gold expanded investigations into the Middle Kuskokwim River to study baseline populations and spawning behavior of rainbow smelt, a key spring subsistence species. Over the past decade, Donlin Gold has led sustained efforts to identify rainbow smelt spawning locations and migration timing—marking a first of its kind in the Yukon-Kuskokwim region. In 2023, this work was enhanced through hydrodynamic surveys to map shallow areas where smelt eggs may be deposited, helping ensure these habitats are not affected by future barging activities. Conducted in collaboration with local subsistence users, the data will play a key role in confirming that river transportation will not adversely impact smelt or their role in community food systems. In 2024, a major milestone was the launch of a pilot project on the George River, a Kuskokwim tributary about 15 miles east of Crooked Creek, aimed at testing methods to monitor juvenile salmon outmigration. In partnership with the Native Village of Napaimute, fish traps and equipment were delivered and installed to support the research. This project will continue into 2025, expanding to capture the full smolt migration season from mid-April through late June, following river break-up. Donlin Gold, Napaimute, and contractor teams will collect data throughout the season. These efforts reflect a broader commitment to understanding and protecting regional fish populations and biodiversity. Looking ahead, NOVAGOLD and Donlin Gold will continue engaging with regional stakeholders to support collaborative, science-based approaches to biodiversity and fisheries monitoring, both near the project site and across the wider Kuskokwim River watershed. In collaboration with local subsistence users, this gathered information will play a crucial role in confirming that barging will not adversely impact rainbow smelt or their subsistence uses as well as broader supporting broader regional efforts to protect the species.

Row 3

(11.4.1.1) Mining project ID

Select from:

☑ Project 1

(11.4.1.2) Types of area important for biodiversity

Select all that apply

☑ Other areas important for biodiversity

(11.4.1.4) Country/area

Select from:

☑ United States of America

(11.4.1.5) Name of the area important for biodiversity

Kuskokwim River Watershed

(11.4.1.6) Proximity

Select from:

☑ Adjacent

(11.4.1.8) Briefly describe your organization's activities in the reporting year located in or near to the selected area

Since mid-2023, NOVAGOLD and Donlin Gold have strengthened collaboration with Calista and TKC to monitor and engage in discussions around salmon fisheries in the Kuskokwim and Yukon River watersheds. In 2023, efforts focused on identifying opportunities to monitor, evaluate, and support salmon populations. One key initiative undertaken in 2024 was the launch of a pilot project on the George River, a Kuskokwim River tributary located approximately 15 miles east of the village of Crooked Creek. The aim of this program was to test methods to monitor salmon smolt outmigration. In collaboration with the Native Village of Napaimute, fish traps and equipment were delivered to and installed in the George River to support this important research. The program will continue into 2025 when the study will expand to cover the full juvenile salmon migration season. The work will begin in mid- to late-April after river break-up with the mobilization of Donlin Gold, contractors, and Napaimute employees to collect smolt outmigration data over an approximately two-month period through late June. Looking ahead, NOVAGOLD and Donlin Gold are also collaborating with regional stakeholders on additional biodiversity-focused projects, both near the project site and throughout the broader Kuskokwim River watershed.

(11.4.1.9) Indicate whether any of your organization's activities located in or near to the selected area could negatively affect biodiversity

Select from:

☑ Yes, but mitigation measures have been implemented

(11.4.1.10) Mitigation measures implemented within the selected area

Select all that apply

☑ Other, please specify :Expansion of monitoring collaboration with Alaska Native Corporation partners and identification of opportunities for impactful action in the future.

(11.4.1.11) Explain how your organization's activities located in or near to the selected area could negatively affect biodiversity, how this was assessed, and describe any mitigation measures implemented

Since mid-2023, NOVAGOLD and Donlin Gold have strengthened collaboration with Calista and TKC to monitor and engage in discussions around salmon fisheries in the Kuskokwim and Yukon River watersheds. In 2023, efforts focused on identifying opportunities to monitor, evaluate, and support salmon populations. One key initiative undertaken in 2024 was the launch of a pilot project on the George River, a Kuskokwim River tributary located approximately 15 miles east of the village of Crooked Creek. The aim of this program was to test methods to monitor salmon smolt outmigration. In collaboration with the Native Village of Napaimute, fish traps and equipment were delivered to and installed in the George River to support this important research. The program will continue into 2025 when the study will expand to cover the full juvenile salmon migration season. The work will begin in mid- to late-April after river break-up with the mobilization of Donlin Gold, contractors, and Napaimute employees to collect smolt outmigration data over an approximately two-month period through late June. Looking ahead, NOVAGOLD and Donlin Gold are also collaborating with regional stakeholders on additional biodiversity-focused projects, both near the project site and throughout the broader Kuskokwim River watershed.

Row 4

(11.4.1.1) Mining project ID

Select from:

☑ Project 1

(11.4.1.2) Types of area important for biodiversity

Select all that apply

☑ Other areas important for biodiversity

(11.4.1.4) Country/area

Select from:

☑ United States of America

(11.4.1.5) Name of the area important for biodiversity

Yukon River Watershed

(11.4.1.6) Proximity

Select from:

☑ Up to 25 km

(11.4.1.8) Briefly describe your organization’s activities in the reporting year located in or near to the selected area

Since mid-2023, NOVAGOLD and Donlin Gold have strengthened collaboration with Calista and TKC to monitor and engage in discussions around salmon fisheries in the Kuskokwim and Yukon River watersheds. In 2023, efforts focused on identifying opportunities to monitor, evaluate, and support salmon populations. One keyinitiative undertaken in 2024 was the launch of a pilot project on the George River, a Kuskokwim River tributary located approximately 15 miles east of the village of Crooked Creek. The aim of this program was to test methods to monitor salmon smolt outmigration. In collaboration with the Native Village of Napaimute, fish traps and equipment were delivered to and installed in the George River to support this important research. The program will continue into 2025 when the study will expand to cover the full juvenile salmon migration season. The work will begin in mid- to late-April after river break-up with the mobilization of Donlin Gold, contractors, and Napaimute employees to collect smolt outmigration data over an approximately two-month period through late June. Looking ahead, NOVAGOLD and Donlin Gold are also collaborating with regional stakeholders on additional biodiversity-focused projects, both near the project site and throughout the broader Kuskokwim River watershed.

(11.4.1.9) Indicate whether any of your organization’s activities located in or near to the selected area could negatively affect biodiversity

Select from:

☑ Yes, but mitigation measures have been implemented

(11.4.1.10) Mitigation measures implemented within the selected area

Select all that apply

☑ Restoration

(11.4.1.11) Explain how your organization’s activities located in or near to the selected area could negatively affect biodiversity, how this was assessed, and describe any mitigation measures implemented

NOVAGOLD began implementing its Biodiversity Policy in 2023 and has continued development of a Biodiversity Action Plan. This plan, once finalized, will address species of concern with a focus on key indicator species—particularly salmon—which are critically important to regional stakeholders and are currently experiencing declining returns. In 2024, the company re-initiated baseline aquatic monitoring in the Crooked Creek watershed, including studies of salmon, other fish,

macroinvertebrates, and periphyton, as well as assessments of sediment and fish tissue quality to help establish pre-mining environmental conditions. Additionally, since 2021, NOVAGOLD has been planning and initiating a fish habitat restoration project aimed at reversing the impacts of historic placer mining—activities not conducted by NOVAGOLD or Donlin Gold. The project focuses on restoring habitats for resident fish and coho salmon by re-establishing natural hydrologic conditions and preserving valuable pond areas formed during past mining activities.
[Add row]

(11.5) Can you disclose the mining project area and the area of land disturbed for each of your mining projects?

(11.5.1) Disclosing mining project area and area of land disturbed

Select from:
☑ Yes

(11.5.2) Comment

At Donlin Gold from the start of the reporting period a total of 8.09 hectares of land had been disturbed and not yet rehabilitated, all related to limited exploration activities with no onsite mine waste or water management facilities. During the reporting period 0 hectares of land was newly disturbed due to limited field activity. In terms of rehabilitation 0.40 hectares of land were newly rehabilitated matching the planned rehabilitation for the year.
[Fixed row]

(11.5.1) Provide details on the mining project area and the area of land disturbed for each of your mining projects.

Row 1

(11.5.1.1) Mining project ID

Select from:
☑ Project 1

(11.5.1.2) Total area of owned land/lease/project area (hectares)

48996

(11.5.1.3) Total area disturbed to date (hectares)

9

(11.5.1.4) Area disturbed in the reporting year (hectares)

0

(11.5.1.5) Type(s) of habitat disturbed in the reporting year

Select all that apply

☑ Natural habitat

(11.5.1.6) Comment

All land disturbance is related to minimal exploration activities with no onsite mine waste or water management facilities present. Currently land disturbance is minimal with impact footprints being small and varying according to the planned site activities each season. Despite this, all relevant data is meticulously managed through Donlin Golds Environmental Management System which includes tracking and verifying the completion of all action items.
[Add row]

(11.6) Are there artisanal and small-scale mining (ASM) operations active in your mining project areas or in their area of influence?

Select from:

☑ No

(11.7) Do you adopt biodiversity action plans to manage your impacts on biodiversity?

Select from:

☑ Yes

(11.7.1) Describe your criteria for defining which sites are required to produce biodiversity action plans.

NOVAGOLD has only one project site. At Donlin Gold, NOVAGOLD has recognized the critical importance of biodiversity and the potential impacts of project activities To address these concerns and enhance biodiversity, Donlin Gold and NOVAGOLD understood the need for a Biodiversity Action Plan (BAP). This plan will outline

the current state of biodiversity in the Donlin Gold project area, including the Crooked Creek watershed and the broader Kuskokwim River and Kuskokwim Bay regions. It will assess potential impacts on key habitats and species and include strategies to avoid, minimize, or restore these impacts. The BAP will incorporate data from environmental studies, including the Donlin Gold FEIS, and considers ongoing climate change research. The plan will focus on protecting important species such as salmon and includes mechanisms for tracking and adapting to new information and conditions. NOVAGOLD's Biodiversity Policy aims for no net loss of biodiversity values and strives to enhance them. The BAP will be designed to ensure compliance with international standards and address environmental and social concerns effectively.

(11.8) Provide details on mining projects that are required to produce Biodiversity Action Plans.

(11.8.1) Number of mining projects required to produce a BAP

1

(11.8.2) % of mining projects required to produce a BAP that have one in place

0

(11.8.3) Format

Select all that apply

☑ Stand-alone document

☑ Part of general Environmental Management System

(11.8.4) Frequency BAPs are reviewed

Select all that apply

☑ Eventually

(11.8.5) Please explain

NOVAGOLD began the implementation of its Biodiversity Policy and initiated development of a Biodiversity Action Plan (BAP) in 2023. This plan will focus on addressing key species of concern particularly emphasizing salmon due to its critical importance to regional stakeholders. While the BAP has been started it is still in the developmental phase and has not yet been published. In 2024, as part of our ongoing commitment to protecting biodiversity, Donlin Gold continued to implement the Aquatic Resources Monitoring Plan (ARMP) by collecting aquatic species and habitat data, that will serve as a baseline to compare against in future years during

mine operations. In addition, the Donlin Gold project has increased aquatic habitat in the Crooked Creek drainage to further enhance the surrounding ecosystem. This ongoing process aims to provide a robust foundation for the BAP ensuring that it is informed by the latest data and continues to address potential impacts on local biodiversity effectively.
[Fixed row]

(11.9) Have any of your projects caused, or have the potential to cause, significant adverse impact(s) on biodiversity?

(11.9.1) Any projects caused, or have the potential to cause, significant adverse impacts on biodiversity

Select from:

☑ Yes

(11.9.2) Comment

NOVAGOLD acknowledges the growing impacts of climate change in Alaska and recognizes that preserving biodiversity is essential for the well-being of communities that rely on subsistence resources. The Donlin Gold project remains in the permitting and pre-construction development stage, and no construction decision has been made. As such, there are currently no significant impacts on biodiversity. However, NOVAGOLD remains committed to proactively addressing these environmental challenges as part of responsible project advancement. This commitment is reflected in the company's formal Climate Change and Biodiversity policies, the release of its inaugural Task Force on Climate-related Financial Disclosures (TCFD) report in 2023, and its ongoing work to align with the Taskforce on Nature-related Financial Disclosures (TNFD) framework. In 2024 and into 2025, NOVAGOLD has continued to implement and expand practices outlined in its TCFD report while progressing its integration of TNFD guidance to better assess and disclose nature-related risks and opportunities. These efforts are being applied not only at the Donlin Gold project level but also across NOVAGOLD's corporate offices in Salt Lake City and Vancouver, reinforcing the company's broader commitment to environmental responsibility and sustainability throughout its operations.
[Fixed row]

(11.9.1) For your disclosed mining projects, provide details of the significant adverse impacts on biodiversity, with the respective response to the impact.

Row 1

(11.9.1.1) Mining project ID

Select from:

☑ Project 1

(11.9.1.2) Type of impact

Select from:

☑ Direct

(11.9.1.3) Impact

Select from:

☑ Negative impacts on ecosystem service provision

(11.9.1.4) Description of the impact

The Donlin Gold project remains in the permitting and pre-construction development stage, with no construction decision made to date. As a result, there are currently no significant impacts on biodiversity. However, NOVAGOLD is proactively preparing to address potential ecological risks associated with future construction and operations through a comprehensive suite of strategic initiatives. These include the reinitiation of baseline aquatic monitoring and ongoing restoration efforts in the Crooked Creek watershed, designed to mitigate potential mining impacts on local ecosystems. By rigorously establishing and maintaining pre-mining environmental conditions through detailed monitoring and habitat restoration, NOVAGOLD seeks to preserve ecological balance and enhance ecosystem health and resilience. The 2024 sustainability report further highlights NOVAGOLD's commitment to integrating biodiversity considerations into its broader environmental, social, and governance framework, including adoption of the Taskforce on Nature-related Financial Disclosures (TNFD) framework to better assess, manage, and disclose nature-related risks and opportunities. These actions reinforce NOVAGOLD's dedication to responsible environmental stewardship and long-term sustainability throughout the life of the Donlin Gold project.

(11.9.1.5) Consequence

Select from:

☑ Moderate

(11.9.1.6) Likelihood

Select from:

☑ Possible

(11.9.1.7) Describe response

The negative impacts on the ecosystem such as potential disruptions to aquatic and terrestrial habitats from future mining activities are considered moderatebut manageable. NOVAGOLD's proactive measures including baseline monitoring and habitat restoration indicate a strong commitment to mitigating these impacts. However the scale of mining operations can lead to substantial ecosystem alterations. The effectiveness of the mitigation strategies will be critical in determining whether these impacts remain at a moderate level or escalate to serious. Given the comprehensive approach to monitoring and restoration it is expected that the impacts can be controlled.

Row 2

(11.9.1.1) Mining project ID

Select from:

☑ Project 1

(11.9.1.2) Type of impact

Select from:

☑ Direct

(11.9.1.3) Impact

Select from:

☑ Other, please specify :Effects on Threatened Species

(11.9.1.4) Description of the impact

The Donlin Gold project places strong emphasis on mitigating potential impacts from future construction and operations on local fauna and flora, with particular focus on salmon populations. Recognizing salmon's critical importance to regional stakeholders and their current decline, NOVAGOLD has implemented dedicated conservation and monitoring programs to ensure these species are protected from adverse effects related to project activities. In addition, ongoing studies of rainbow smelt—a key subsistence species—are designed to prevent negative impacts from barging and other operations. These efforts underscore NOVAGOLD's continued commitment to safeguarding biodiversity and maintaining the health of aquatic ecosystems throughout the life of the project.

(11.9.1.5) Consequence

Select from:

☑ Serious

(11.9.1.6) Likelihood

Select from:

☑ Possible

(11.9.1.7) Describe response

The potential consequence of effects on flora and fauna, particularly salmon and rainbow smelt, future construction and operation of the Donlin Gold project are considered serious. These species are crucial to both the local ecosystem and community subsistence. While efforts to monitor and mitigate impacts to protect these species are robust, the inherent risk posed by mining activities, such as habitat disruption and pollution could potentially negatively impact the species, if monitoring and mitigation are not appropriately implemented, as required by the project's permits.

Row 3

(11.9.1.1) Mining project ID

Select from:

☑ Project 1

(11.9.1.2) Type of impact

Select from:

☑ Direct

(11.9.1.3) Impact

Select from:

☑ Effects on sensitive or migratory species

(11.9.1.4) Description of the impact

Sensitive species remain a critical focus of NOVAGOLD's environmental strategy. Comprehensive studies of salmon and resident fish populations, along with the macroinvertebrates and periphyton that serve as their primary food sources, are actively conducted to evaluate and mitigate potential impacts from project activities. Additionally, restoration efforts targeting pond habitats—created by historic placer mining activities not conducted by NOVAGOLD or Donlin Gold—aim to enhance habitat quality and provide ongoing support for these sensitive species. Through these initiatives, NOVAGOLD is dedicated to maintaining population stability and preserving habitat integrity within the region.

(11.9.1.5) Consequence

Select from:

☑ Moderate

(11.9.1.6) Likelihood

Select from:

☑ Possible

(11.9.1.7) Describe response

In accordance with Donlin Gold's Environmental Impact Statement and permits, mine development is not expected to have significant adverse impacts on salmon or other species. However, it is possible that sensitive species, which are vulnerable to environmental changes, could experience some localized consequences from even minor disruptions. NOVAGOLD's ongoing monitoring, mitigation, and conservation efforts will be important in addressing potential disruptions. Effective implementation of these measures is expected to manage the impacts and prevent them from escalating to significant or serious levels.

Row 4

(11.9.1.1) Mining project ID

Select from:

☑ Project 1

(11.9.1.2) Type of impact

Select from:

☑ Direct

(11.9.1.3) Impact

Select from:

☑ Conversion and/or degradation of natural habitats (other than forests)

(11.9.1.4) Description of the impact

Addressing habitat conversion and degradation resulting from future construction and operations at the Donlin Gold project is central to NOVAGOLD's reclamation and restoration efforts. Site reclamation focuses on re-establishing pre-mining hydrologic conditions and rehabilitating natural habitats affected by historic mining activities, which were not conducted by NOVAGOLD or Donlin Gold. By restoring natural conditions and preserving valuable habitats, NOVAGOLD aims to mitigate the adverse effects of habitat loss and degradation. Furthermore, planned biodiversity enhancement projects will continue to support these efforts, ensuring that the broader ecological landscape benefits from ongoing restoration and conservation initiatives.

(11.9.1.5) Consequence

Select from:

☑ Serious

(11.9.1.6) Likelihood

Select from:

☑ Possible

(11.9.1.7) Describe response

The conversion of natural habitats and degradation from future construction and operation of the Donlin Gold project is a potentially serious to extreme impact. Mining activities often result in substantial changes to natural landscapes including habitat loss and alteration. Although Donlin Gold is undertaking reclamation and restoration efforts to address these impacts the process of reversing habitat conversion and degradation can be complex and challenging. The potential severity is heightened by the irreversible nature of some habitat changes and the time required for ecosystems to recover fully. Effective reclamation and future enhancement projects are designed to mitigate these impacts but the potential for significant and long lasting effects remains possible.
[Add row]

(11.10) Are biodiversity issues integrated into any aspects of your long-term strategic business plan, and if so how?

Long-term business objectives

(11.10.1) Are biodiversity-related issues integrated?

Select from:

☑ Yes, biodiversity-related issues are integrated

(11.10.2) Long-term time horizon (years)

Select from:

☑ >30

(11.10.3) Please explain

NOVAGOLD is deeply committed to high standards of environmental performance with a central long term objective of achieving no net loss in biodiversity across all significant assets. This commitment is not only a core value but also a key component of the company's strategic business plan. By setting ambitious biodiversity goals and integrating them into its operational framework NOVAGOLD ensures that these objectives drive decision-making and resource allocation across its projects The integration is reflected in the company's environmental policies which align with its broader business strategies ensuring that all operations including those at the Donlin Gold project contribute to the overarching goal of protecting and enhancing ecosystems. This alignment helps guide the company's growth and operational strategies while reinforcing its commitment to ecological sustainability.

Strategy for long-term objectives

(11.10.1) Are biodiversity-related issues integrated?

Select from:

☑ Yes, biodiversity-related issues are integrated

(11.10.2) Long-term time horizon (years)

Select from:

☑ 5-10

(11.10.3) Please explain

To enhance biodiversity and address concerns while achieving its long-term objectives, NOVAGOLD is already implementing several initiatives, including baseline aquatic monitoring, habitat restoration, and effective rehabilitation strategies, all embedded in the project's operational plans. Regular monitoring of biodiversity impacts and adaptive management practices are also incorporated into the project's performance metrics and reporting systems. Collaboration with local communities and stakeholders, as outlined in the company's community engagement plans, plays a vital role in these efforts. To further ensure consistent and coordinated efforts toward its biodiversity goals and the measurement of success, NOVAGOLD has initiated the development of a comprehensive Biodiversity Action Plan (BAP). This plan will outline the current state of biodiversity in the project area, including the Crooked Creek watershed and the broader Kuskokwim River and Kuskokwim Bay regions. It will detail potential impacts on key habitats and species, including strategies to avoid, minimize, or restore these impacts. Integrated into the company's broader business strategy, the BAP will place biodiversity considerations at the forefront of operational planning and execution. Additionally, NOVAGOLD's biodiversity policies align with regional, national, and international standards and are incorporated into the company's compliance and strategic partnership frameworks.

Financial planning

(11.10.1) Are biodiversity-related issues integrated?

Select from:

☑ Yes, biodiversity-related issues are integrated

(11.10.2) Long-term time horizon (years)

Select from:

☑ 5-10

(11.10.3) Please explain

In its financial planning NOVAGOLD prioritizes investments in biodiversity related initiatives to support its environmental commitments. This includes allocating budgetary resources for baseline studies, habitat restoration projects and ongoing monitoring efforts such as those implemented at the Donlin Gold project. These financial commitments are integrated into the company's annual budgeting process and capital expenditure plans ensuring that sufficient resources are dedicated to achieving its biodiversity goals. The focus on cost management and efficiency is also reflected in financial strategies that optimize the financial aspects of implementing biodiversity action plans and rehabilitation projects. Long-term financial goals are set with an emphasis on balancing economic objectives with environmental responsibilities, which is incorporated into the company's financial forecasting and strategic planning processes. By evaluating the economic impact of biodiversity initiatives and integrating these considerations into broader business strategies, as evidenced by NOVAGOLD's Corporate Biodiversity policy. NOVAGOLD ensures that its financial plans support both sustainability and operational success. This approach helps align financial resources with environmental priorities reinforcing the company's commitment to sustainable development and responsible business practices.
[Fixed row]

(11.11) Have you specified any measurable and time-bound targets related to your commitments to reduce or avoid impacts on biodiversity?

Select from:

☑ No

(11.12) Has your organization adopted avoidance and/or minimization as strategies to prevent or mitigate significant adverse impacts on biodiversity?

Select from:

☑ Yes

(11.12.1) Provide relevant company-specific examples of your implementation of avoidance and minimization actions to manage adverse impacts on biodiversity.

Row 1

(11.12.1.1) Mining project ID

Select from:

☑ Project 1

(11.12.1.2) Approach and type of measure

Minimization

☑ Other minimization measure, please specify :Mitigation measures for potential impacts to Biodiversity

(11.12.1.3) Description

To manage and minimize potential adverse impacts on biodiversity NOVAGOLD ensures that all new activities and operations comply with applicable laws and regulations applying best management practices where regulations are not specified to mitigate environmental risks. For properties acquired by NOVAGOLD remediation and mitigation of historical mining impacts involve collaborative efforts with former owners, government agencies, and local communities. The comprehensive reclamation and closure plan approved by the State of Alaska outlines the strategies for closing and reclaiming the Donlin Gold project site to a stable and healthy condition after mining operations end. This plan includes specific requirements for revegetation, long term water management, and measures to stabilize contours and revegetate the site in alignment with leading practices. The reclamation plan was updated in 2023 for its regular five-year renewal with input from our Native Corporation partners, Calista and TKC before submission to the State. Financial assurances are provided as required by state law to ensure the successful implementation of the reclamation plan with updates made for each plan renewal.

Row 2

(11.12.1.1) Mining project ID

Select from:

☑ Project 1

(11.12.1.2) Approach and type of measure

Minimization

☑ Other minimization measure, please specify :Minimizing potential impact to species, wildlife and key biological resources

(11.12.1.3) Description

Protecting biodiversity is essential for sustaining ecosystems and supporting the livelihoods of local communities around the Donlin Gold project. Guided by NOVAGOLD's Biodiversity Policy, we are committed to integrating biodiversity management into all activities, aiming for no net loss of biodiversity values and actively enhancing them across the Y-K region. In 2024, Donlin Gold continued implementing the ARMP, collecting aquatic species and habitat data to establish baseline conditions for future mine operations. Habitat enhancements in the Crooked Creek drainage have further supported local ecosystems. Since mid-2023, NOVAGOLD and Donlin Gold have strengthened partnerships with Calista and TKC to monitor and support salmon fisheries in the Kuskokwim and Yukon River watersheds. A key 2024 initiative was the launch of a pilot project on the George River, a Kuskokwim tributary near Crooked Creek, to test methods for monitoring salmon smolt outmigration. In collaboration with the Native Village of Napaimute, fish traps and equipment were installed, with data collection continuing into 2025 to cover the full juvenile salmon migration season. Additionally, Donlin Gold re-initiated baseline aquatic monitoring in Crooked Creek, including studies of salmon, resident fish, macroinvertebrates, and periphyton, alongside sediment and fish tissue sampling to characterize pre-mining conditions. Quarterly water sampling occurred in 2024, with some biomonitoring delayed due to high flows. Donlin Gold is planning further monitoring efforts, building on over two decades of data. Since 2021, fish habitat restoration projects in Crooked Creek have aimed to improve access and habitat for resident fish impacted by historic placer mining, with restored areas opened in 2024 and early monitoring showing positive signs. Further habitat enhancements are planned for 2025, including development of the Snow Gulch inlet channel. Since 2015, Donlin Gold has conducted annual surveys of Rainbow Smelt spawning near Kalskag, a vital subsistence species. Studies in 2022 included bathymetric and propeller scour analyses to ensure barging impacts remain minimal, with 2024 efforts continuing to monitor spawning patterns. These ongoing studies support NOVAGOLD's commitment to protecting aquatic species and mitigating any potential impacts from future project activities.
[Add row]

(11.13) Have significant impacts on biodiversity been mitigated through restoration?

(11.13.1) Have significant impacts on biodiversity been mitigated through restoration?

Select from:

☑ Yes

(11.13.2) Comment

Restoration efforts at the Donlin Gold project site are already demonstrating significant positive impacts on biodiversity. Initiated in 2021, the fish habitat restoration project in the Crooked Creek watershed focuses on improving areas affected by historic placer mining, not conducted by NOVAGOLD or Donlin Gold, with particular attention to resident fish and coho salmon. By reestablishing pre-mining hydrologic conditions and preserving valuable pond habitats created by the historic mining these efforts aim to enhance the local aquatic ecosystem. In 2024, reclamation work at the historic Lyman placer site was completed, restoring stream and pond habitats with aquatic life access and use, and initial observations show these restoration measures are promising for improving local biodiversity and supporting fish populations. Overall the restoration work at Donlin Gold exemplifies a commitment to environmental stewardship and showcases the potential for mining projects to positively influence local ecosystems and biodiversity.
[Fixed row]

(11.13.1) Provide details on restoration actions you have in place in your sites.

Row 1

(11.13.1.1) Mining project ID

Select from:
☑ Project 1

(11.13.1.2) Description of the impact being mitigated by restoration

Since 2021, Donlin Gold has been advancing a fish habitat restoration project aimed at repairing habitats affected by historic placer mining—activities not conducted by NOVAGOLD or Donlin Gold—with a focus on supporting both resident fish and coho salmon populations. In 2023, reclamation work successfully reestablished pre-mining hydrologic conditions and preserved valuable pond areas created by legacy mining. In 2024, restored areas were formally opened to fish access, and initial monitoring began, showing early signs of successful habitat use. These efforts mark a key step in NOVAGOLD's broader commitment to enhancing aquatic ecosystems and supporting long-term biodiversity in the Crooked Creek watershed.

(11.13.1.3) Type of ecosystem restored

Select from:
☑ Other ecosystems

(11.13.1.4) Total area restored to date (hectares)

0

(11.13.1.5) Total area to be restored (hectares)

0

(11.13.1.6) Target year

0

(11.13.1.7) Describe restoration actions

Since 2021, Donlin Gold has actively advanced a fish habitat restoration project to repair stream segments adversely impacted by historic placer mining—activities not conducted by NOVAGOLD or Donlin Gold. The project prioritizes improving conditions for both resident fish and coho salmon by focusing on restoring stream function rather than specific land acreage. In 2023, restoration efforts successfully reinstated pre-mining hydrologic conditions and preserved key pond habitats formed during previous mining operations. In 2024, these restored stream segments were opened to fish access, and initial monitoring efforts began, indicating early signs of improved habitat use. This ongoing initiative reflects NOVAGOLD's commitment to enhancing aquatic ecosystems and supporting biodiversity in the Crooked Creek watershed.

Row 2

(11.13.1.1) Mining project ID

Select from:

☑ Project 1

(11.13.1.2) Description of the impact being mitigated by restoration

Donlin Gold has continued expanding its research in the Middle Kuskokwim River to deepen understanding of rainbow smelt populations, a key subsistence resource for local communities. Over the past decade, Donlin Gold has systematically mapped spawning and migration patterns to identify and help protect critical habitats. In 2022 and 2023, the company conducted detailed hydrodynamic surveys to evaluate how barging activities might affect these sensitive areas. Building on these efforts, Donlin Gold continued monitoring rainbow smelt spawning activity in 2024, further informing its barging strategy and mitigation planning. As part of its commitment to minimizing environmental impacts, Donlin Gold is implementing targeted measures to prevent disruption of smelt habitats during future operations. Ongoing collaboration with local subsistence users remains central to this work, ensuring that traditional knowledge informs decision-making and that barging operations support the long-term sustainability of rainbow smelt populations and their subsistence use.

(11.13.1.3) Type of ecosystem restored

Select from:

☑ Other ecosystems

(11.13.1.4) Total area restored to date (hectares)

0

(11.13.1.5) Total area to be restored (hectares)

0

(11.13.1.6) Target year

0

(11.13.1.7) Describe restoration actions

In 2024, Donlin Gold continued expanding its efforts to protect habitats along the Middle Kuskokwim River, with a focus on preserving critical environments for rainbow smelt—an important subsistence species for local communities. Over the past decade, Donlin Gold has conducted extensive research to map spawning and migration patterns, helping to identify and safeguard key habitats. Building on hydrodynamic surveys completed in 2022 and 2023, the company maintained ongoing monitoring efforts in 2024 to better understand environmental conditions and assess potential impacts from barging activities. These efforts are carried out in close collaboration with local subsistence users, ensuring traditional knowledge informs mitigation planning. The goal is to implement effective protection measures that maintain and, where possible, enhance habitats vital for rainbow smelt and their long-standing role in regional subsistence practices.
[Add row]

(11.14) Have significant residual impacts of your projects been compensated through biodiversity offsets?

(11.14.1) Have residual impacts been compensated through biodiversity offsets?

Select from:

☑ Yes

(11.14.2) Comment

NOVAGOLD and Donlin Gold have both made commitments to strive to achieve no net loss across all significant biodiversity or substantive biodiversity values. In pursuit of this, Donlin has purchased wetland credits. Donlin purchased 3.6 riverine credits and 6.2 slope wetland credits from Great Land Trust In-Lieu Fee Program to compensate for the future loss of 1.78 acres of Riverine and 2.76 acres of Slope wetlands.
[Fixed row]

(11.14.1) Provide details on the biodiversity offsets you have in place.

Row 1

(11.14.1.1) Mining project ID

Select from:
☑ Project 1

(11.14.1.2) Description of the impact being offset

As part of permitting the Donlin Gold project, a compensatory mitigation plan was developed and implemented for the future impacts from mining operations.

(11.14.1.3) Motivation

Select from:
☑ Legal requirements

(11.14.1.4) Type of offset

Select from:
☑ Compensation agreements

(11.14.1.5) Area (hectares)

5800

(11.14.1.6) Describe the offset

The plan includes a combination of stream restoration in Crooked Creek of historic placer mining disturbance, site reclamation, and long-term preservation of off-site areas that are under threat of development. To date, Donlin Gold has initiated the stream restoration work. Donlin Gold has also purchased wetland credits. Donlin Gold purchased 3.6 riverine credits and 6.2 slope wetland credits from Great Land Trust In-Lieu Fee Program to compensate for the loss of 1.78 acres of Riverine and 2.76 acres of Slope wetlands. Finally, preservation agreements have been negotiated to support for several thousand additional wetland acres and tens of miles of stream that support anadromous fish.
[Add row]

(11.15) Is your organization implementing or supporting additional conservation actions?

(11.15.1) Implementing or supporting additional conservation actions?

Select from:
☑ Yes

(11.15.2) Comment

NOVAGOLD is actively implementing and supporting additional conservation actions. In 2023, site reclamation work began at the Lyman family's historic placer site, aiming to re-establish pre-mining hydrologic conditions while preserving valuable fish habitat created by historic mining. This work will continue into 2024, with plans to open the areas to fish access and initiate monitoring to evaluate the project's success. Additionally, NOVAGOLD supports the "In it for the Long Haul" backhaul program, which focuses on collecting and safely disposing of hazardous and electronic waste from villages in the Y-K region, achieving significant waste removal milestones in 2024. NOVAGOLD also supports the Clean-up Green-up program, which helps with the collection and disposal of trash from various areas across the Y-K region. These efforts reflect our commitment to advancing conservation and environmental stewardship.
[Fixed row]

(11.15.1) Provide details on the main ACAs you are implementing or supporting.

Row 1

(11.15.1.1) Project title

In it for the Long Haul Backhaul Program

(11.15.1.2) Project theme

Select from:

☑ Other, please specify :Local Community Environmental and Hazardous Waste

(11.15.1.3) Country/Area

Select from:

☑ United States of America

(11.15.1.4) Location

Select from:

☑ In the area of influence of mining project

(11.15.1.5) Primary motivation

Select from:

☑ Voluntary

(11.15.1.6) Timeframe

Select from:

☑ Undefined

(11.15.1.7) Start year

2018

(11.15.1.9) Description of project

In It For The Long Haul BackHaul Program - This important initiative focuses on the collection, removal, and safe disposal of hazardous waste from villages across the Y-K region, preventing harm from landfills and impacts to waterways. This year, the program achieved significant milestones, including waste removal from fish camps in the Middle Kuskokwim and the start of backhaul operations along the Yukon River. In total, approximately 210,000 pounds of waste were removed in 2024.

(11.15.1.10) Description of outcome to date

In total, the program has removed approximately 803,000 pounds of hazardous material removed from the Yukon-Kuskokwim region since the program began in 2018.

Row 2

(11.15.1.1) Project title

Clean Up Green Up Program

(11.15.1.2) Project theme

Select from:

☑ Other, please specify :Local Community Environmental and Hazardous Waste

(11.15.1.3) Country/Area

Select from:

☑ United States of America

(11.15.1.4) Location

Select from:

☑ In the area of influence of mining project

(11.15.1.5) Primary motivation

Select from:

☑ Voluntary

(11.15.1.6) Timeframe

Select from:

☑ Undefined

(11.15.1.7) Start year

2018

(11.15.1.9) Description of project

Clean Up Green Up - This initiative targets the collection and proper disposal of trash from the tundra, roads, public areas, and beaches in the Y-K region that accumulates over the winter months.

(11.15.1.10) Description of outcome to date

Donlin Gold continued its support of the annual "Clean-Up Green-Up" program, assisting 47 communities across the Y-K region in 2024. The initiative which occurs in the Spring, focuses on collecting and properly disposing of trash from the tundra, roads, public areas, and beaches accumulated over the winter months.

Row 3

(11.15.1.1) Project title

Lyman Family's historic placer site

(11.15.1.2) Project theme

Select from:

☑ Restoration (other)

(11.15.1.3) Country/Area

Select from:

☑ United States of America

(11.15.1.4) Location

Select from:

☑ In the area of influence of mining project

(11.15.1.5) Primary motivation

Select from:

☑ Other, please specify :Supporting additional conservation actions

(11.15.1.6) Timeframe

Select from:

☑ Undefined

(11.15.1.7) Start year

2023

(11.15.1.9) Description of project

In 2023, Donlin Gold began reclamation and restoration work at the historic Lyman family placer mining site, with the goal of re-establishing pre-mining hydrologic conditions while preserving valuable fish habitat that had developed from past mining activity. In 2024, the restored areas were opened to fish access, and monitoring efforts were initiated to evaluate habitat use and overall project effectiveness.

(11.15.1.10) Description of outcome to date

In 2023, restoration work at the Lyman family's historic placer site advanced with the creation of stream and pond habitats. In 2024, efforts focused on improving fish access and monitoring habitat use to support long-term aquatic ecosystem recovery.
[Add row]

(11.16) Do your mining projects have closure plans in place?

(11.16.1) Are there closure plans in place?

Select from:

☑ Yes

(11.16.2) Comment

A closure plan for the Donlin Gold project was published in July 2017 and updated in 2023. This Reclamation and Closure Plan outlines the procedures for stabilizing and reclaiming facilities associated with the proposed project utilizing the best available reclamation technologies. The plan reflects Donlin Golds commitment to concurrent reclamation which involves rehabilitating parts of the site while operations are ongoing. As reclamation data is collected from field activities and test plots the plan may be updated to incorporate new information and adapt to changes in design construction operations and reclamation processes. The reclamation plan is formally reviewed every 5 years.
[Fixed row]

(11.16.1) Please provide details on mines with closure plans.

(11.16.1.1) % of mines with closure plans

100

(11.16.1.2) % of closure plans that take biodiversity aspects into consideration

100

(11.16.1.3) Is there a financial provision for mine closure expenditure?

Select from:
☑ Yes, for all mines

(11.16.1.4) Frequency closure plans are reviewed

Select all that apply
☑ Regularly (all projects)
☑ Occasionally (all projects)

(11.16.1.5) Please explain

Donlin Gold is committed to concurrent reclamation, which involves rehabilitating portions of the site while operations are ongoing. As reclamation data is collected from field activities and test plots, the guidelines for the closure plan may be updated to improve future activities. Potential revisions will accommodate new design information as the project progresses through its phases, as well as changes in operating plans and mining schedules. The closure plan will also evolve based on the stabilization and reclamation of earlier phases, insights gained from initial project experiences, and the adoption of new reclamation techniques as they become

available. In accordance with the State of Alaska's requirements, a formal review of the reclamation plan takes place every 5 years to ensure that it remains effective and reflects the latest data and practices. This periodic review process ensures that the reclamation efforts continue to meet regulatory standards and adapt to any changes in project conditions or operational practices
[Fixed row]

(11.17) Can you disclose the area rehabilitated (in total and in the reporting year) for each of your mining projects?

(11.17.1) Disclosing area rehabilitated (in total and in the reporting year)

Select from:
☑ Partially

(11.17.2) Comment

In the 2024 reporting year a total of 0.40 hectares of land was newly rehabilitated at the Donlin Gold project site. This rehabilitation primarily involved areas impacted by limited exploration level activities with no associated onsite mine waste or water management facilities. The focus was on restoring land disturbed during exploration in line with the project's commitment to minimizing environmental impacts.
[Fixed row]

(11.17.1) Provide details on the area rehabilitated (total/reporting year) for each of your mining projects, including post-mining land use.

Row 1

(11.17.1.1) Mining project ID

Select from:
☑ Project 1

(11.17.1.2) Total area rehabilitated (hectares)

0

(11.17.1.3) Area rehabilitated in the reporting year (hectares)

0.4

(11.17.1.4) Describe post-mining land use

Donlin Gold is committed to rehabilitating land throughout and following the mining process to meet long-term reclamation objectives that prioritize restoring wildlife habitat and supporting dispersed recreational uses consistent with regional land use plans. Following Alaska's reclamation standards, which require mining activities to prevent undue degradation of land and water, Donlin Gold integrates contemporaneous reclamation to stabilize disturbed areas progressively during operations. The reclamation plan employs advanced engineering techniques, including contouring and stabilization, to create seedbeds that promote early native plant colonization and enhance habitat resilience. Use of native vegetation and soil amendments supports effective ecosystem recovery. Key objectives include ensuring public safety, preventing erosion, shaping stable landforms, establishing productive vegetative communities, and managing water to minimize contact with disturbed materials while adequately treating pit water. Final reclamation efforts will commence promptly after mining at individual facilities or mine units concludes, with a comprehensive reclamation plan submitted for regulatory approval at least two years before anticipated closure. This plan will be based on actual site conditions rather than predictive assumptions. Post-closure reclamation goals are targeted to be completed within five years after processing ceases. Ongoing inspection, monitoring, and maintenance programs will support the achievement of these long-term reclamation goals. Water management remains a critical component, with long-term strategies for treatment and discharge designed in compliance with permit requirements. The definitive closure water management plan will be adaptive, evolving with continuous monitoring data, operational experience, and advancements in treatment technology to ensure effective post-closure environmental stewardship.
[Add row]

(11.18) Do you collaborate or engage in partnerships with non-governmental organizations to promote the implementation of your biodiversity-related goals and commitments?

(11.18.1) Collaborating or partnering with NGOs

Select from:
☑ Yes

(11.18.2) Comment

NOVAGOLD and Donlin Gold actively engages in partnerships with non-governmental organizations to support our biodiversity-related goals. For instance, NOVAGOLD and Donlin Gold are collaborating with the Kuskokwim Watershed Council, which includes Indigenous people from the region, and the Native Village of Napaimute on a pilot juvenile salmon monitoring project. Additionally, our rainbow smelt studies have consistently involved local community members to incorporate

traditional knowledge. More broadly, our agreements with Native Corporations, Calista and TKC, include collaborative efforts to protect important biological and subsistence resources.
[Fixed row]

(11.18.1) Provide details on main collaborations and/or partnerships with non-governmental organizations that were active during the reporting year.

Row 1

(11.18.1.1) Organization

Native Village of Napaimute

(11.18.1.2) Scope of collaboration

Select from:
☑ Specific mining projects

(11.18.1.3) Mining project ID

Select all that apply
☑ Project 1

(11.18.1.4) Areas of collaborations

Select all that apply
☑ Other, please specify :Biodiversity-related goals/Subsistence and Biological

(11.18.1.5) Describe the nature of the collaboration

NOVAGOLD and Donlin Gold actively engage with non-governmental organizations to support our biodiversity-related goals. For instance, NOVAGOLD and Donlin Gold are collaborating with the Kuskokwim Watershed Council, which included Indigenous people from the region, and the Native Village of Napaimute on a pilot juvenile salmon monitoring project. Additionally, our rainbow smelt studies have consistently involved local community members to incorporate traditional knowledge. More broadly, our agreements with Native Corporations, Calista and TKC, include collaborative efforts to protect important biological and subsistence resources.

(11.18.1.6) Duration (until)

Select from:

☑ No specified timeframe

Row 2

(11.18.1.1) Organization

Calista Corporation

(11.18.1.2) Scope of collaboration

Select from:

☑ Specific mining projects

(11.18.1.3) Mining project ID

Select all that apply

☑ Project 1

(11.18.1.4) Areas of collaborations

Select all that apply

☑ Other, please specify :Biodiversity-related goals/Subsistence and Biological Resources

(11.18.1.5) Describe the nature of the collaboration

NOVAGOLD and Donlin Gold actively engage in with non-governmental organizations and Indigenous groups to advance our biodiversity conservation goals. Notably, our agreements with Native Corporations Calista and TKC foster joint efforts to monitor, protect, and sustainably manage critical biological and subsistence resources. These efforts emphasize inclusive engagement, combining traditional knowledge with scientific research to support the resilience of regional ecosystems and the communities that depend on them.

(11.18.1.6) Duration (until)

Select from:

☑ No specified timeframe

Row 3

(11.18.1.1) Organization

The Kuskokwim Corporation

(11.18.1.2) Scope of collaboration

Select from:

☑ Specific mining projects

(11.18.1.3) Mining project ID

Select all that apply

☑ Project 1

(11.18.1.4) Areas of collaborations

Select all that apply

☑ Other, please specify :Biodiversity-related goals/Subsistence and Biological Resources

(11.18.1.5) Describe the nature of the collaboration

NOVAGOLD and Donlin Gold actively engage with non-governmental organizations and Indigenous groups to advance our biodiversity conservation goals. Notably, our agreements with Native Corporations Calista and TKC foster joint efforts to monitor, protect, and sustainably manage critical biological and subsistence resources. These efforts emphasize inclusive engagement, combining traditional knowledge with scientific research to support the resilience of regional ecosystems and the communities that depend on them.

(11.18.1.6) Duration (until)

Select from:

☑ No specified timeframe

Row 4

(11.18.1.1) Organization

The Kuskokwim Watershed Council

(11.18.1.2) Scope of collaboration

Select from:

☑ Specific mining projects

(11.18.1.3) Mining project ID

Select all that apply

☑ Project 1

(11.18.1.4) Areas of collaborations

Select all that apply

☑ Other, please specify :Biodiversity-related goals/Subsistence and Biological Resources

(11.18.1.5) Describe the nature of the collaboration

NOVAGOLD and Donlin Gold actively engage with non-governmental organizations to support our biodiversity-related goals. For instance, collaborating with the Kuskokwim Watershed Council, which includes Indigenous people from the region, and the Native Village of Napaimute on a pilot juvenile salmon monitoring project. Additionally, our rainbow smelt studies have consistently involved local community members to incorporate traditional knowledge.

(11.18.1.6) Duration (until)

Select from:

☑ No specified timeframe

[Add row]

(11.20) Do you engage with other stakeholders to further the implementation of your policies concerning biodiversity?

Select from:

☑ Yes

(11.20.1) Provide relevant examples of other biodiversity-related engagement activities that happened during the reporting year.

Row 1

(11.20.1.1) Activities

Select from:

☑ Engaging with local communities

(11.20.1.2) Mining project ID

Select all that apply

☑ Project 1

(11.20.1.3) Please explain

To ensure the effectiveness of its initiatives, Donlin Gold actively engages with local stakeholders to align its benefits with community aspirations for sustainable development. This collaborative approach underpins the identification and execution of community investment projects. The community relations team works closely with local representatives to prioritize initiatives that foster long-term, self-sustaining benefits and improved livelihoods. Donlin Gold LLC maintains open dialogue to explore ways to mitigate or modify project activities that may affect stakeholders. Feedback is coordinated through the DATROC, which includes senior leadership from Calista and TKC and advises Donlin Gold on community interests. Separately, the SCAC provides input on subsistence-related matters, ensuring that local and traditional knowledge informs project planning and decision-making. In 2023, Donlin Gold implemented its Biodiversity Policy, focusing on salmon and other key aquatic and terrestrial species. Reclamation work began at Crooked Creek to restore habitats impacted by historic placer mining. Research expanded in the Middle Kuskokwim River to study rainbow smelt populations and spawning behavior, including hydrodynamic surveys to protect smelt eggs from barging. Collaboration with Calista and TKC was enhanced to monitor salmon fisheries and support declining populations. Regular stakeholder engagement continued through DATROC. In 2024, restored habitats in Crooked Creek were opened to fish access, with new monitoring programs launched and additional improvements planned. Biodiversity monitoring efforts broadened to safeguard critical species and ecosystems under the Biodiversity Policy. Rainbow smelt research and mitigation efforts continued, incorporating both community input and scientific data. Collaboration with Native Corporations supported salmon conservation and sustainable resource management. Stakeholder collaboration through DATROC remained ongoing, ensuring that community guidance continues to shape project planning and environmental stewardship. This timeline reflects Donlin Gold's commitment to sustainability through proactive biodiversity conservation, community partnership, and restoration aligned with regional values and ecological needs.

Row 2

(11.20.1.1) Activities

Select from:

☑ Engaging with indigenous peoples

(11.20.1.2) Mining project ID

Select all that apply

☑ Project 1

(11.20.1.3) Please explain

In 2023, Donlin Gold collaborated with Alaska Native Corporations and Native Alaskan stakeholders by initiating work to monitor salmon fisheries across the Kuskokwim and Yukon River watersheds, addressing the ongoing decline in salmon populations that are vital to regional traditional practices. By mid-2023, NOVAGOLD began identifying project opportunities aimed at enhancing salmon population health, reinforcing its commitment to biodiversity conservation and community engagement. In 2024, these collaborative efforts expanded. Donlin Gold, in close coordination with Calista, The Kuskokwim Corporation, and local communities, advanced targeted initiatives focused on salmon habitat restoration, monitoring, and research. Notably, ongoing aquatic habitat improvements in the Crooked Creek watershed were opened to fish access, with monitoring programs initiated to evaluate ecological recovery. These efforts enhanced data sharing and community-led stewardship programs to support salmon resilience in the face of environmental changes. This sustained focus reflects NOVAGOLD's holistic approach to biodiversity, combining scientific research, traditional knowledge, and stakeholder collaboration to support the long-term health of salmon populations central to cultural and subsistence practices across the region.
[Add row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

(13.1.1) Other environmental information included in your CDP response is verified and/or assured by a third party

Select from:

☑ No, and we do not plan to obtain third-party verification/assurance of other environmental information in our CDP response within the next two years

(13.1.2) Primary reason why other environmental information included in your CDP response is not verified and/or assured by a third party

Select from:

☑ Other, please specify :At this time, NOVAGOLD's CDP response has not been verified or assured by a third party.

(13.1.3) Explain why other environmental information included in your CDP response is not verified and/or assured by a third party

At this time, NOVAGOLD's CDP response has not been verified or assured by a third party. Other environmental information included in the response has also not been externally reviewed for verification or assurance.
[Fixed row]

(13.2) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

	Additional information	Attachment (optional)
	Attached is NOVAGOLD's 2024 Sustainability Report	*2024-NOVAGOLD-Sustainability-Report-FINAL (1).pdf*

[Fixed row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Vice President & General Counsel

(13.3.2) Corresponding job category

Select from:

☑ General Counsel

[Fixed row]

(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website.

Select from:

☑ Yes, CDP may share our Disclosure Submission Lead contact details with the Pacific Institute