

TCFD DISCLOSURE INDEX

NOVAGOLD recognizes that over the coming years, Earth is likely to experience unprecedented climatic changes, and that our stakeholders are increasingly concerned about the significant risk this poses. The Company recognizes the significance of considering climate change when evaluating the effects of our operations on the global environment, as well as how climate change and the transition to a low-carbon economy are likely to influence our business.

NOVAGOLD commits to annually disclosing the progression and enhancement of its climate change management strategy and disclosure practices in a transparent manner. We will be integrating content aligned to the recommendations of the TCFD and TNFD into sustainability reporting.

The purpose of this report is to outline the progress being made by NOVAGOLD in developing a robust and holistic climate change strategy, reaffirming our established targets, and summarizing the methodologies being enacted to ensure that climate change targets are met. Content aligned to the recommendations of the TCFD and the TNFD is integrated throughout this report, with key content mapped by the index tables below.

TCFD DISCLOSURE	LOCATION OF CONTENT RELATED TO THE DISCLOSURE
GOVERNANCE	
a) Describe the Board's oversight of climate-related risks and opportunities	Governance – Overview of NOVAGOLD's Commitments to Governance Governance – Our Approach to Governance
b) Describe management's role in assessing and managing climate-related risks and opportunities	Governance – Overview of NOVAGOLD's Commitments to Governance Governance – Our Approach to Governance
STRATEGY	
a) Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term	Environment – Our Approach to the Environment – Climate Change
b) Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning	Environment – Our Approach to the Environment – Climate Change Governance – Our Approach to Governance
c) Describe the resilience of the organization's strategy , taking into consideration different climate-related scenarios, including a 2°C or lower scenario	Environment – Our Approach to the Environment – Climate Change
RISK MANAGEMENT	
a) Describe the organization's processes for identifying and assessing climate-related risks	Our ESG Approach – Integrated Management for a Lasting Legacy – Integrated Risk Management Environment – Our Approach to the Environment – Climate Change
b) Describe the organization's processes for managing climate-related risks	Our ESG Approach – Integrated Management for a Lasting Legacy – Integrated Risk Management Environment – Our Approach to the Environment – Climate Change
c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management	Our ESG Approach – Integrated Management for a Lasting Legacy – Integrated Risk Management Environment – Our Approach to the Environment – Climate Change

TCFD DISCLOSURE INDEX

TCFD DISCLOSURE	LOCATION OF CONTENT RELATED TO THE DISCLOSURE
METRICS AND TARGETS	
a) Disclose the metrics used to assess climate related risks and opportunities in line with its strategy and risk management process	Environment – 2025 Environmental Performance – Energy, Emissions, and Climate Change
b) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks	Environment – 2025 Environmental Performance – Energy, Emissions, and Climate Change
c) Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets	Environment – Our Approach to the Environment – Climate Change

TNFD DISCLOSURE INDEX

TNFD DISCLOSURE	LOCATION OF CONTENT RELATED TO THE DISCLOSURE
GOVERNANCE	
a) Describe the Board's oversight of nature-related dependencies, impacts, risks, and opportunities	Governance – Overview of NOVAGOLD's Commitments to Governance Governance – Our Approach to Governance Governance – Governance, Sustainability and Climate Change
b) Describe management's role in assessing and managing nature-related dependencies, impacts, risks and opportunities	Governance – Overview of NOVAGOLD's Commitments to Governance Governance – Our Approach to Governance Governance – Governance, Sustainability and Climate Change Our ESG Approach – Integrated Management for a Lasting Legacy – Ensuring Accountability
c) Describe the organization's human rights policies and engagement activities , and oversight by the Board and management, with respect to Indigenous Peoples, Local Communities, affected and other stakeholders, in the organization's assessment of, and response to, nature-related dependencies, impacts, risks and opportunities	Environment – Our Approach to the Environment – Environmental Programs Environment – Our Approach to the Environment – Biodiversity and Baseline Environmental Studies / Mitigation Governance – Governance Policies Communities – Fundraising and Community Support Communities – 2025 Community Performance
STRATEGY	
a) Describe the nature-related dependencies, impacts, risks, and opportunities the organization has identified over the short, medium and long term	Environment – Our Approach to the Environment – Climate Change
b) Describe the effect nature-related dependencies, impacts, risks, and opportunities have had on the organization's business model, value chain, strategy and financial planning, as well as any transition plans or analysis in place	Environment – Our Approach to the Environment – Climate Change
c) Describe the resilience of the organization's strategy to nature-related risks and opportunities, taking into consideration different scenarios	Environment – Our Approach to the Environment – Climate Change
d) Disclose the locations of assets and/or activities in the organization's direct operations and, where possible, upstream and downstream value chain(s) that meet the criteria for priority locations	Environment – Our Approach to the Environment – Climate Change

TNFD DISCLOSURE INDEX

TNFD DISCLOSURE	LOCATION OF CONTENT RELATED TO THE DISCLOSURE
RISK MANAGEMENT	
a) Describe the organization's processes for identifying, assessing, and prioritizing nature-related dependencies, impacts, risks and opportunities in its direct operations	Our ESG Approach – Integrated Management for a Lasting Legacy – Integrated Risk Management Environment – Our Approach to the Environment – Climate Change
b) Describe the organization's processes for identifying, assessing, and prioritizing nature-related dependencies, impacts, risks and opportunities in its upstream and downstream value chain(s)	Our ESG Approach – Integrated Management for a Lasting Legacy – Integrated Risk Management Environment – Our Approach to the Environment – Climate Change
c) Describe the organization's processes for monitoring nature-related dependencies, impacts, risks and opportunities	Our ESG Approach – Integrated Management for a Lasting Legacy – Integrated Risk Management Environment – Our Approach to the Environment – Climate Change
d) Describe how processes for identifying, assessing, prioritizing and monitoring nature-related risks are integrated into and inform the organization's overall risk management processes	Our ESG Approach – Integrated Management for a Lasting Legacy – Integrated Risk Management Our ESG Approach – Integrated Management for a Lasting Legacy – Business Planning Strategy and Action Environment – Our Approach to the Environment – Climate Change
METRICS AND TARGETS	
a) Disclose the metrics used by the organization to assess and manage material nature-related risks and opportunities in line with its strategy and risk management process	Environment – 2025 Environmental Performance – Energy, Emissions, and Climate Change Environment – 2025 Environmental Performance – Waste Management, Spills, Reclamation, and Compliance Environment – 2025 Environmental Performance – Water Management and Use
b) Disclose the metrics used by the organization to assess and manage dependencies and impacts on nature	Environment – 2025 Environmental Performance – Energy, Emissions, and Climate Change Environment – 2025 Environmental Performance – Waste Management, Spills, Reclamation, and Compliance Environment – 2025 Environmental Performance – Water Management and Use
c) Describe the targets and goals used by the organization to manage nature-related dependencies, impacts, risks and opportunities and its performance against these	Environment – Our Approach to the Environment – Climate Change Environment – 2025 Environmental Performance – Waste Management, Spills, Reclamation, and Compliance

TRANSITION RISKS AND OPPORTUNITIES



MARKET

- Investor pressure regarding climate change management and targets amid shifting and uncertain sentiment toward ESG and climate action
- Supply chain disruption as a result of physical and transitional impacts of climate change for materials including fuel
- Increased interest in mining, driven by the energy transition, leading to contractor shortages, or A-teams not being available, resulting in delays and increased CAPEX

- Increased cost of raw materials and fuel could increase operating costs
- Enhanced voluntary sustainability reporting could increase costs and required staff hours dedicated to specific tasks. However, this presents the opportunity to gradually enhance transparency and credibility in our disclosures, particularly regarding climate change, aligning with our commitment to continuous sustainability improvement

TECHNOLOGY

- Transition to low carbon technologies may present risks to Donlin Gold where there are limited opportunities for renewables and fossil fuels are the most efficient energy sources. However, constructing energy infrastructure may provide opportunities as a transition for surrounding communities to lower their emissions and provide a lower cost of energy (natural gas versus diesel power generation)
- As technologies develop, there may be opportunities to implement more efficient and lower carbon technologies for energy production at sites and offices

REPUTATION

- Confidence and perceptions of operations could be affected by natural alterations to ecosystems and biodiversity even when such changes are not attributable to Company operations
- NOVAGOLD has the opportunity to distinguish itself from competitors by getting “sustainability reporting right from the start” – through strong risk management, meaningful progress, and transparent reporting aligned with globally recognized frameworks – positioning the Company to earn positive stakeholder recognition

POLICY AND LEGAL

- Uncertainty around the status and direction of emerging regulations and international climate agreements presents a risk, as evolving frameworks and potential new requirements may impact strategic decision-making
- Uncertainty and shifts in regulatory requirements – such as changes in permitting standards, evolving compliance expectations, and the potential imposition or rollback of laws – pose risks, as they can drive costs, delays, and operational complexity
- Carbon pricing could increase costs, affecting the feasibility of mining projects

PHYSICAL RISKS AND OPPORTUNITIES



ACUTE

- There is the potential for increased severity and frequency of extreme weather events, which could disrupt operations and supply chains, and damage local community infrastructure

CHRONIC

- Opportunities to enhance the resilience of operations by developing and implementing effective mitigation strategies
- Potential sea level changes, temperature increases, and droughts from climate change could disrupt supply chains – particularly in remote areas – requiring logistical changes and potentially causing conflicts over local transport resources. Coordination with other users would be needed to mitigate negative impacts with any unforeseen environmental changes

- 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

- As a result of increased temperatures, sites may undergo other physical changes (e.g., through melting permafrost) that require additional mitigation and/or increased costs

Risk Scenario Analysis

Several techniques have been utilized in the development of our climate change strategy in addition to risk identification exercises, including desktop studies and information gathering, data collection and quantitative analysis, and live interactive workshops. Short- (2028), medium- (2035) and long-term (2050) impacts are considered through scenario analysis to assess risks.

The scenarios used in NOVAGOLD’s analysis were developed by the Network for Greening the Financial System (NGFS), recommended by the TCFD and the TNFD. NGFS scenarios identify a range of plausible futures to provide a common reference point, illustrating how physical and transition risks could develop in different future scenarios from the present day through to 2050 and beyond. In each scenario, and at every time interval, additional risks are added as appropriate.

NAME	DESCRIPTIONS	
HOT HOUSE WORLD	<ul style="list-style-type: none"> All nations globally implement policies that are currently signed into law (e.g., no changing legislation, carbon price remains insignificant) Emissions continue on current trend due to insufficient political pressure. Average global warming of 4-6°C and irreversible changes like higher sea level rise 	<ul style="list-style-type: none"> Indifference to or denial of the imperatives of the climate crisis Litigation / policy / reputation risks are low Extreme physical risks – including both acute (fires, storms, extreme weather) and chronic (changes in sea level, gradual decrease of soil moisture)
FRAGMENTED WORLD	<ul style="list-style-type: none"> Global divergence in the response to climate change, some countries take action to achieve net zero; others do not – overall delayed response Policy stringency varies between sectors of the economy 	<ul style="list-style-type: none"> Both physical risks and transition risks moderate to high (some physical impacts as not enough action soon enough, snowball effect) Voluntary carbon markets, other transition risks high in some economies including those linked to technology, litigation, etc Fuel cost spikes due to uncertainty and changing economics
NET ZERO 2050	<ul style="list-style-type: none"> Net CO₂ emissions reach zero around 2050, giving at least a 50% chance of limiting global warming to below 1.5°C by the end of the century Physical risks are relatively low, but transition risks are high Strong policy response including changes to permitting requirements 	<ul style="list-style-type: none"> Carbon prices increase steadily and strongly but predictably Energy mix changes and energy price increases, hence greenhouse gas emissions (GHG) are kept under control Consumers and workforce more aware, leading to a change in habits

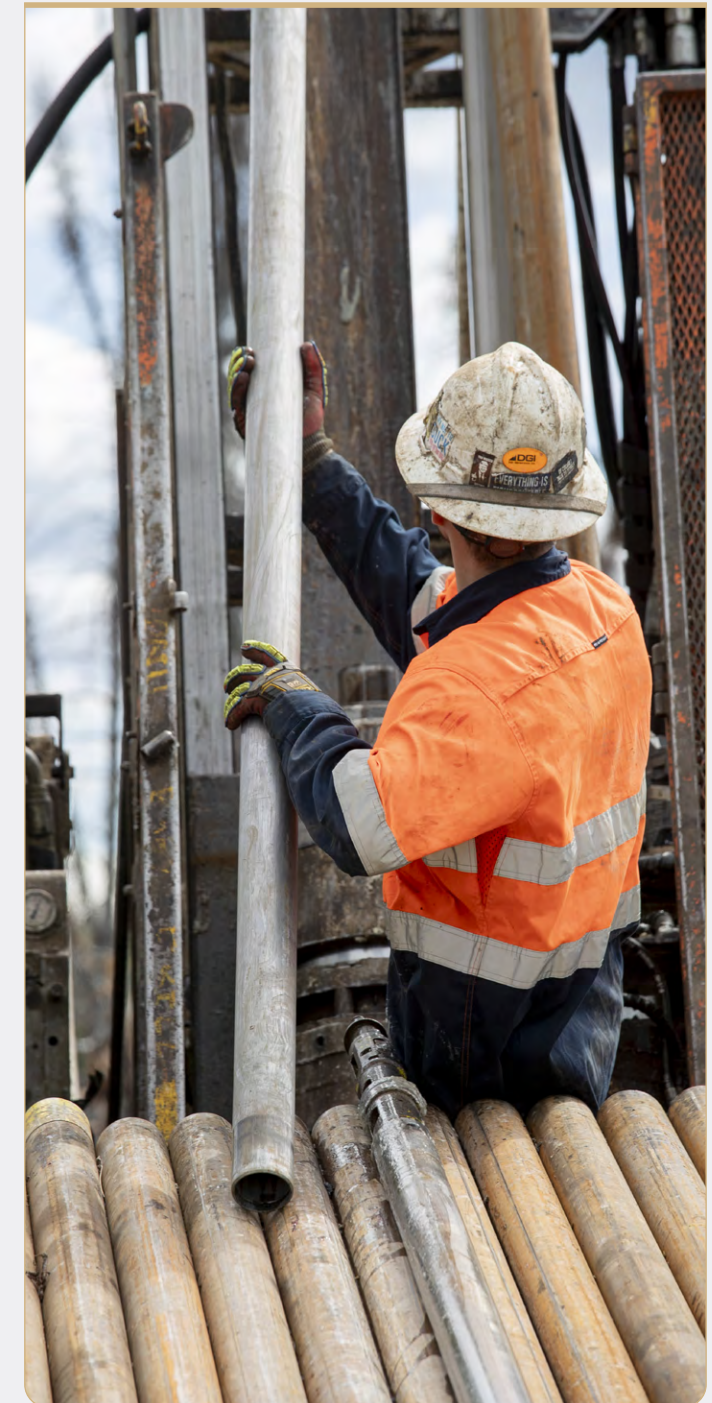
This scenario analysis assumes the best-case scenario for nature, where climate and nature-related challenges are addressed together in a holistic manner – rather than focusing solely on climate action at the cost of neglecting nature-related threats or opportunities.

As per the scenario descriptions above, risk profiles developed for NOVAGOLD across the scenarios show:

Net Zero 2050 has the highest transition risks, especially regarding energy production on site, cost of enhanced mandatory ESG activities and communication.

Fragmented World also has high transition risks, as well as physical risks becoming more prominent. Prominent risks identified included energy production on site communication and barging.

The Hot House World scenario had the risk profile containing the most impactful physical risks, particularly with respect to potential long-term changes in fish populations, and potential hydrological variability impacting barging activities. Reputation risks were also ranked highly with respect to impact, due to the potential for the perception being that any changes are due to activity by Donlin Gold.



GRI DISCLOSURE INDEX

DISCLOSURE	LOCATION/RESPONSE
2-1 Organizational details	About NOVAGOLD (page 5)
2-2 Entities included in the organization's sustainability reporting	About NOVAGOLD (page 5) About this Report (page 7)
2-3 Reporting period, frequency and contact point	About this Report (page 7)
2-4 Restatements of information	About this Report (page 7)
2-5 External assurance	About this Report (page 7)
2-6 Activities, value chain and other business relationships	About NOVAGOLD (page 5) About the Donlin Gold project (page 6) About this Report (page 7)
2-7 Employees	People – 2025 People Performance (page 37)
2-8 Workers who are not employees ¹	
2-9 Governance structure and composition	Governance – Overview of NOVAGOLD's Commitments to Governance (page 39) Governance – Our Approach to Governance (page 40)
2-10 Nomination and selection of the highest governance body	Governance – Our Approach to Governance (page 40)
2-11 Chair of the highest governance body	Governance – 2025 Corporate Governance Performance (page 43)
2-12 Role of the highest governance body in overseeing the management of impacts	Our ESG Approach – Integrated Management for a Lasting Legacy (page 12) Our ESG Approach – Ensuring Accountability (page 15) Governance – Overview of NOVAGOLD's Commitments to Governance (page 39) Governance – Our Approach to Governance (page 40)
2-13 Delegation of responsibility for managing impacts	Our ESG Approach – Integrated Management for a Lasting Legacy (page 12) Governance – Overview of NOVAGOLD's Commitments to Governance (page 39) Governance – Our Approach to Governance (page 40)
2-14 Role of the highest governance body in sustainability reporting	Governance – Our Approach to Governance – Governance, Sustainability and Climate Change (page 42)
2-15 Conflicts of interest	Governance – Our Approach to Governance (page 40)
2-16 Communication of critical concerns ¹	
2-17 Collective knowledge of the highest governance body	Management Information Circular (page 92) – Orientation and Continuing Education

1. Some breakdowns requested under this disclosure are omitted as NOVAGOLD does not report on these indicators.

GRI DISCLOSURE INDEX

DISCLOSURE	LOCATION/RESPONSE
2-18 Evaluation of the performance of the highest governance body	Management Information Circular (page 95) – Board Renewal
2-19 Remuneration policies	Management Information Circular (page 46) – Compensation Discussion & Analysis
2-20 Process to determine remuneration	Management Information Circular (page 49) – Risk Assessment of Compensation Policies and Practices
2-21 Annual total compensation ratio	Management Information Circular (page 72) – CEO Pay Ratio – 12.46 to 1
2-22 Statement on sustainable development strategy	President and CEO Message (page 8)
2-23 Policy commitments	Governance - Overview of NOVAGOLD's Commitments to Governance (page 39)
2-24 Embedding policy commitments	NOVAGOLD Governance website page Governance – Overview of NOVAGOLD's Commitments to Governance (page 39)
2-25 Processes to remediate negative impacts	Our ESG Approach – Integrated Management for a Lasting Legacy – Ensuring Accountability (page 10)
2-26 Mechanisms for seeking advice and raising concerns	Code of Business Conduct and Ethics (page 7)
2-27 Compliance with laws and regulations	Environment – Waste Management, Spills, Reclamation, and Compliance (page 25) Governance – Overview of NOVAGOLD's Commitments to Governance (page 39)
2-28 Membership associations	Governance – 2025 Corporate Governance Performance (page 43)
2-29 Approach to stakeholder engagement	Our ESG Approach – Integrated Management for a Lasting Legacy (page 10) Communities – Overview of NOVAGOLD's Commitment to Communities (page 28)
2-30 Collective bargaining agreements ¹	
202-1 Ratios of standard entry level wage by gender compared to local minimum wage ¹	
202-2 Proportion of senior management hired from the local community	People – 2025 People Performance (page 37)
203-1 Infrastructure investments and services supported	Communities – Our Approach to Communities – Community Investment (page 30)
203-2 Significant indirect economic impacts	Communities – Our Approach to Communities (page 28) Communities – 2025 Community Performance (page 32)
204-1 Proportion of spending on local suppliers	Communities – 2025 Community Performance (page 32)
205-1 Operations assessed for risks related to corruption	Governance – Overview of NOVAGOLD's Commitment to Governance – Governance policies (page 40) 2025 Sustainability Report Data Sheet (page 56)
205-2 Communication and training about anti-corruption policies and procedures	Governance – Overview of NOVAGOLD's Commitment to Governance – Governance policies (page 40) 2025 Sustainability Report Data Sheet (page 56)

1. NOVAGOLD does not report on this indicator.

GRI DISCLOSURE INDEX

DISCLOSURE	LOCATION/RESPONSE
205-3 Confirmed incidents of corruption and actions taken	Governance – Overview of NOVAGOLD’s Commitment to Governance – Governance policies (page 40) 2025 Sustainability Report Data Sheet (page 56)
206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Governance – Overview of NOVAGOLD’s Commitment to Governance – Governance policies (page 40)
302-1 Energy consumption within the organization	Environment – 2025 Environmental Performance – Energy, Emissions and Climate Change (page 23) 2025 Sustainability Report Data Sheet (page 56)
302-2 Energy consumption outside of the organization	Environment – 2025 Environmental Performance – Energy, Emissions and Climate Change (page 23) 2025 Sustainability Report Data Sheet (page 56)
302-3 Energy intensity	Environment – 2025 Environmental Performance – Energy, Emissions and Climate Change (page 23) 2025 Sustainability Report Data Sheet (page 56)
302-4 Reduction of energy consumption	Environment – Our Approach to the Environment – Climate Change (page 22)
302-5 Reductions in energy requirements of products and services ¹	
303-1 Interactions with water as a shared resource	Environment – 2025 Environmental Performance – Water Management and Use (page 26) 2025 Sustainability Report Data Sheet (page 56)
303-2 Management of water discharge-related impacts	Environment – 2025 Environmental Performance – Water Management and Use (page 26) 2025 Sustainability Report Data Sheet (page 56)
303-3 Water withdrawal	Environment – 2025 Environmental Performance – Water Management and Use (page 26) 2025 Sustainability Report Data Sheet (page 56)
303-4 Water discharge	Environment – 2025 Environmental Performance – Water Management and Use (page 26) 2025 Sustainability Report Data Sheet (page 56)
303-5 Water consumption	Environment – 2025 Environmental Performance – Water Management and Use (page 26) 2025 Sustainability Report Data Sheet (page 56)
304-1 (now replaced by GRI 301) Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Environment – Overview of NOVAGOLD’s Commitment to the Environment – Components of the EMS (page 20) Environment – 2025 Environmental Performance – Biodiversity and Baseline Environmental Studies / Mitigation (page 24) 2025 Sustainability Report Data Sheet (page 56)

1. NOVAGOLD does not report on this indicator.

GRI DISCLOSURE INDEX

DISCLOSURE	LOCATION/RESPONSE
304-2 Significant impacts of activities, products and services on biodiversity	Environment – Overview of NOVAGOLD’s Commitment to the Environment – Components of the EMS (page 20) Environment – 2025 Environmental Performance – Biodiversity and Baseline Environmental Studies / Mitigation (page 24)
304-3 Habitats protected or restored	Environment – Overview of NOVAGOLD’s Commitment to the Environment – Components of the EMS (page 20) Environment – Our Approach to the Environment – Environmental Programs (page 21) Environment – 2025 Environmental Performance – Biodiversity and Baseline Environmental Studies / Mitigation (page 24)
304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations ¹	
G4 MM1 Amount of land (owned or leased, and managed for production activities or extractive use) disturbed or rehabilitated ^{1,2}	
G4 MM2 Number and percentage of total sites identified as requiring biodiversity management plans according to stated criteria, and the number (percentage) of those sites with plans in place	Environment – Overview of NOVAGOLD’s Commitment to the Environment – Components of the EMS (page 20) Environment – Our Approach to the Environment – Environmental Programs (page 21) Environment – 2025 Environmental Performance – Biodiversity and Baseline Environmental Studies / Mitigation (page 24)
305-1 Direct (Scope 1) GHG emissions	Environment – 2025 Environmental Performance – Energy, Emissions and Climate Change (page 23) 2025 Sustainability Report Data Sheet (page 56)
305-2 Energy indirect (Scope 2) GHG emissions	Environment – 2025 Environmental Performance – Energy, Emissions and Climate Change (page 23) 2025 Sustainability Report Data Sheet (page 56)
305-7 Nitrogen oxides (NO _x), sulfur oxides (SO _x), and other significant air emissions	2025 Sustainability Report Data Sheet (page 56) Environment – Energy, Emissions and Climate Change (page 23)
306-1 Waste generation and significant waste-related impacts	Environment – 2025 Environmental Performance – Waste Management, Spills, Reclamation, and Compliance (page 25) 2025 Sustainability Report Data Sheet (page 56)
306-2 Management of significant waste-related impacts	Environment – 2025 Environmental Performance – Waste Management, Spills, Reclamation, and Compliance (page 25) 2025 Sustainability Report Data Sheet (page 56)

1. NOVAGOLD does not report on this indicator.

2. Not applicable as there are currently no production or extractive use activities at Donlin Gold.

GRI DISCLOSURE INDEX

DISCLOSURE	LOCATION/RESPONSE
306-3 Waste generated	Environment – 2025 Environmental Performance – Waste Management, Spills, Reclamation, and Compliance (page 25) 2025 Sustainability Report Data Sheet (page 56)
306-4 Waste diverted from disposal	2025 Sustainability Report Data Sheet (page 56)
306-5 Waste directed to disposal	2025 Sustainability Report Data Sheet (page 56)
308-1 New suppliers that were screened using environmental criteria ¹	
308-2 Negative environmental impacts in the supply chain and actions taken ¹	
401-1 New employee hires and employee turnover	People – 2025 People Performance – Donlin Gold Employee Turnover (page 37)
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees ¹	
401-3 Parental leave ¹	
403-1 Occupational health and safety management system	Health and Safety – Overview of NOVAGOLD’s Commitment to Health and Safety (page 17) Health and Safety – Our Approach to Health and Safety (page 17)
403-2 Hazard identification, risk assessment, and incident investigation	Health and Safety – Our Approach to Health and Safety (page 17)
403-3 Occupational health services	Health and Safety – Our Approach to Health and Safety (page 17)
403-4 Worker participation, consultation, and communication on occupational health and safety	Health and Safety – Overview of NOVAGOLD’s Commitment to Health and Safety (page 17)
403-5 Worker training on occupational health and safety	Health and Safety – Overview of NOVAGOLD’s Commitment to Health and Safety (page 17) Health and Safety – 2025 Health and Safety Performance (page 18)
403-6 Promotion of worker health	Health and Safety – Our Approach to Health and Safety (page 17)
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships ¹	
403-8 Workers covered by an occupational health and safety management system	Health and Safety – Our Approach to Health and Safety (page 17)
403-9 Work-related injuries	Health and Safety – 2025 Health and Safety Performance (page 18)
403-10 Work-related ill health ¹	
405-1 Diversity of governance bodies and employees	People – 2025 People Performance (page 37)
405-2 Ratio of basic salary and remuneration of women to men ¹	

1. NOVAGOLD does not report on this indicator.

GRI DISCLOSURE INDEX

DISCLOSURE	LOCATION/RESPONSE
406-1 Incidents of discrimination and corrective actions taken	2025 Sustainability Report Data Sheet (page 56)
408-1 Operations and suppliers at significant risk for incidents of child labor	2025 Sustainability Report Data Sheet (page 56)
409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	2025 Sustainability Report Data Sheet (page 56)
411-1 Incidents of violations involving rights of Indigenous Peoples	2025 Sustainability Report Data Sheet (page 56)
G4 MM5 Total number of operations taking place in or adjacent to Indigenous Peoples' territories, and number and percentage of operations or site tools where there are formal agreements with Indigenous Peoples' communities	About this Report (page 7)
413-1 Operations with local community engagement, impact assessments, and development programs	Communities – Our Approach to Communities (page 28) 2025 Sustainability Report Data sheet (page 56)
413-2 Operations with significant actual and potential negative impacts on local communities	2025 Sustainability Report Data Sheet (page 56)
G4 MM6 Number and description of significant disputes relating to land use, customary rights of local communities and Indigenous Peoples ^{2,3}	
G4 MM7 The extent to which grievance mechanisms were used to resolve disputes relating to land use, customary rights of local communities and Indigenous Peoples and the outcomes ^{2,3}	
GM MM8 Number and percentage of company operating sites where ASM takes place on, or adjacent to the site; the associated risks and actions taken to mitigate these risks ⁴	

1. Not material.

2. NOVAGOLD does not report on this indicator.

3. The Donlin Gold project operates on lands and minerals owned by Indigenous Peoples, in accordance with agreements made with them.

4. Not Applicable as ASM does not occur where the Donlin Gold project is located.

2025 SUSTAINABILITY REPORT DATA SHEET

NOVAGOLD is dedicated to advancing the Donlin Gold project in Alaska, developed in partnership with Donlin Gold Holdings, a company 100% wholly-owned by Paulson Advisers LLC and its affiliates.

The project is federally permitted and currently in the development stage. Donlin Gold LLC partners with Alaska Native Corporations that own the mineral and surface rights, as well as Indigenous

communities across the Y-K region and the State. Located on Alaska Native-owned private land designated for mining more than fifty years ago, the project reflects commitments to Calista and TKC to protect the region's lands and people. In 2025, we continued our strong record of environmental stewardship, workplace safety, and community investment.

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2025
ENVIRONMENTAL PERFORMANCE



2025
SOCIAL PERFORMANCE



2025
CORPORATE GOVERNANCE PERFORMANCE

1. In the Federal litigation challenging the Donlin Gold Joint Record of Decision, including the 404 permit and ROW for portions of the pipeline crossing Federal lands, the Court issued a decision on September 30, 2024. The decision upheld the Federal Agencies' analysis on two of the three issues raised in the litigation but agreed with plaintiffs that the Federal Agencies took too narrow a view in analyzing the impact of a theoretical release from the tailings storage facility. Remedy briefing was completed in March 2025 and oral arguments on remedy were held on May 9, 2025. The District Court issued its remand order on June 10, 2025, rejecting Plaintiff's request that the permits be vacated and ordering the Federal Agencies to supplement the EIS with an analysis of a larger hypothetical release from the tailings storage facility. A Notice of Intent to prepare a SEIS was issued in January 2026, and the public comment period for the scoping process closed in February 2026. The USACE and cooperating agencies will now review and consider comments received and proceed with preparation of the draft SEIS which is anticipated to be published in September 2026 in accordance with the coordinated FAST-41 permitting schedule.

2025 ENVIRONMENTAL PERFORMANCE

The results below are reported separately for Donlin Gold LLC and NOVAGOLD. Additional details on environmental practices can be found on the Donlin Gold LLC website: www.donlingold.com.

ITEM	DONLIN GOLD LLC		NOVAGOLD	
	VALUE	COMMENTS	VALUE	COMMENTS
PRODUCTION STATISTICS				
Ounces of Gold Produced – Poured Ounces	0	Not applicable – All of these are not applicable because the Donlin Gold project is not yet in operation.	0	Not applicable – NOVAGOLD has no operating projects.
Ore Mined – Open Pit	0	Not applicable	0	Not applicable
Waste Rock Mined – Open Pit	0	Not applicable	0	Not applicable
Total Ore Processed	0	Not applicable	0	Not applicable
Cyanide Used	0	Not applicable	0	Not applicable
Waste Rock Backfilled – Surface	0	Not applicable	0	Not applicable
Tailings Produced	0	Not applicable	0	Not applicable
Waste that is Geochemically Reactive	0	Not applicable	0	Not applicable
ENVIRONMENTAL INCIDENTS				
Class I – High	0	Immediately reportable to government agencies or impacts beyond site boundary or to surface or ground water, or wildlife mortality of a protected species.	0	Immediately reportable to government agencies or impacts beyond site boundary or to surface or ground water, or wildlife mortality of a protected species.
Class II – Medium	0	Reportable within 48 hours to government agencies, within site boundary, no impacts to surface or ground water, or multiple wildlife mortalities of non-protected species.	0	Reportable within 48 hours to government agencies, within site boundary, no impacts to surface or ground water, or multiple wildlife mortalities of non-protected species.
Class III – Low	0	Reportable monthly, but not immediately, to government agencies, minimal impact within site boundary, and no more than one wildlife mortality.	0	Reportable monthly, but not immediately, to government agencies, minimal impact within site boundary, and no more than one wildlife mortality.
How Many Environmental Incidents were Reported to the Authority?	0		0	

ITEM	DONLIN GOLD LLC		NOVAGOLD	
	VALUE	COMMENTS	VALUE	COMMENTS
NON-COMPLIANCES				
Air	0		0	
Water	0		0	
Waste	0		0	
Land	0		0	
Wildlife	0		0	
Other	0		0	
ENVIRONMENTAL-RELATED FINES				
Number of Fines Levied	0		0	
Value of Environmental-Related Fines	0		0	
SPILLS				
Number of Spills	8	None immediately reportable to agencies, none to water, all less than 10 gallons to land.	0	
Volume of Oil Spills – Liters	36	None immediately reportable to agencies, none to water, all less than 10 gallons to land.	0	
Volume of Fuel Spills – Liters	51	None immediately reportable to agencies, none to water, all less than 10 gallons to land.	0	
Volume of Waste Spills – Liters	0		0	
Volume of Chemical Spills – Liters	0	None to water, all less than 10 gallons to land.	0	
Volume of Other Spills – Liters	0		0	
CLOSURE AND REHABILITATION				
Total Land Disturbed and Not Yet Rehabilitated at Start of Reporting Period – Hectares	7.70	All land disturbance is associated with limited exploration level activities, no on-site mine waste or water management facilities.	0	
Total Amount of Land Newly Disturbed within Reporting Period – Hectares	3.24	All land disturbance is associated with limited exploration level activities, no on-site mine waste or water management facilities.	0	

ITEM	DONLIN GOLD LLC		NOVAGOLD	
	VALUE	COMMENTS	VALUE	COMMENTS
Total Amount of Land Newly Rehabilitated within Reporting Period – Hectares	5.26	All land disturbance is associated with limited exploration level activities, no on-site mine waste or water management facilities.	0	
Total Rehab Planned for the Year – Hectares	0.00	All land disturbance is associated with limited exploration level activities, no on-site mine waste or water management facilities.	0	
WASTE				
Hazardous Waste Produced – Tonnes	0		0	
Non-hazardous Waste Produced – Tonnes	288.8		0	
Hazardous Waste Recycled – Tonnes	0		0	
Non-Hazardous Waste Recycled – Tonnes	3.3		0	
Total Reused – Tonnes	7.8		0	
Total Waste to Landfill – Tonnes	281.0		0	
Total Waste Incinerated – Tonnes	57.7		0	
Mercury produced as a By-Product/ Co-Product – Tonnes	0	No production or processing at Donlin Gold.	0	
EMISSIONS				
NO _x – Stationary Sources – Tonnes	2.2		0	
Number of Regulatory Exceedances	0	De minimis, small camp with no production at the Donlin Gold project.	0	
SO _x – Stationary Sources – Tonnes	0.0041	De minimis, small camp with no production at the Donlin Gold project.	0	
Number of Regulatory Exceedances	0		0	
Particulate Matter – PM10 – µg/m ³	0.084		0	
Volatile Organic Compounds	0.68			
Mercury Air Emissions – Tonnes	0	No production or processing at Donlin Gold.	0	
Number of Regulatory Exceedances	0		0	

ITEM	DONLIN GOLD LLC		NOVAGOLD	
	VALUE	COMMENTS	VALUE	COMMENTS
WATER USE				
Surface Water – Cubic Meters	0		568	Includes Salt Lake City and Vancouver offices.
Groundwater – Cubic Meters	1,951.2	All returned to ground after treatment.	0	
Total Withdrawals – Cubic Meters	1,951.2	All returned to ground after treatment.	568	
BIODIVERSITY				
Biodiversity Policy				Biodiversity Policy.pdf
CLIMATE CHANGE				
Climate Change Policy				Climate Change Policy.pdf
ENERGY INPUTS / GHG EMISSIONS				
Electricity – from Outside Sources – Kwh	0	All on-site power generation.	37,843	All NOVAGOLD power from outside sources.
Electricity – Self-generated – Kwh	1,065,300		0	
Diesel used for Power Generation – Liters	193,930		0	
HFO used for Power Generation – Liters	0		0	
Electricity Produced by Renewable Sources – Kwh	0		0	
Natural Gas – MMBTU	0		0	
Diesel used (Less Consumption for Power Generation) – Liters	391,665	De minimis – limited camp activity and not tracked in 2025	0	
Propane used – Liters	2,591	De minimis – limited camp activity and not tracked in 2025	0	
Petrol / Gasoline used – Liters	16,853	De minimis – limited camp activity and not tracked in 2025	0	
Aviation Fuel used	127,103		0	
Total Scope 1 GHG Emissions – Tonnes of CO ₂	1,638		0	
Scope 1 GHG Emissions from Diesel – Stationary	521		0	
Scope 1 GHG Emissions from Diesel – Mobile	1,050		0	
Total Scope 2 GHG Emissions	0		19.92	

2025 SOCIAL PERFORMANCE

The results below are reported separately for Donlin Gold LLC and NOVAGOLD, where applicable. Donlin Gold LLC information is reported on a 100 percent basis. For additional current details on NOVAGOLD's

community and social development practices, please refer to NOVAGOLD's most recent Form 10-K, Form 10-Q, and management information circular dated March 24, 2026 available at

www.sec.gov, www.sedarplus.ca or on NOVAGOLD's website [here](http://www.novagold.com). Additional details on social practices can also be found on the Donlin Gold LLC website: www.donlingold.com.

ITEM	DONLIN GOLD LLC		NOVAGOLD	COMMENTS
	TOTAL OR			
	LOW (IF APPLICABLE)	HIGH (IF APPLICABLE)		
EMPLOYMENT				
Male Employees	24	58	7	High ranges of Donlin Gold LLC employees in all rows reflect the seasonal nature of work at the project site
Female Employees	10	17	7	
Male Contractors	2	2	1	
Female Contractors	0	2	0	
Local Employees	20	48	Not applicable	"Local" is defined as Alaska
Regional Employees	4	49	Not applicable	"Regional" is defined as Y-K region
Shareholder Employees	12	36	Not applicable	"Shareholder" refers to having a relationship with Calista or TKC*
National Employees	10	75	14	"National" for Donlin Gold LLC refers to the U.S. For NOVAGOLD, to U.S. and Canada
Foreign National Employees	0	0	0	
Local Senior Managers	5	5	Not applicable	
Regional Senior Managers	4	29	Not applicable	
National Senior Managers	5	5	Not applicable	
Foreign National Senior Managers	0	0	Not applicable	All employees / contractors are U.S. or Canadian citizens
Number of Non-Management Employees who are Female	7	14	7	"Non-Management" for NOVAGOLD means non-executive
Number of Management-level Employees who are Female	2	2	1	"Management" for NOVAGOLD means executive

* Calista Corporation (Calista), which owns the mineral resources at the Donlin Gold project, and the The Kuskokwim Corporation (TKC), which owns much of the surface land.

ITEM	DONLIN GOLD LLC		NOVAGOLD	COMMENTS
	TOTAL OR			
	LOW (IF APPLICABLE)	HIGH (IF APPLICABLE)		
Local Contractors	2	4	Not applicable	In 2025, Donlin Gold hired two contractors to support key functions at the site. Their work primarily focused on information technology services and regional advisory services.
Regional Contractors	0	0	Not applicable	
National Contractors	0	0	Not applicable	
Foreign National Contractors	0	0	Not applicable	All employees / contractors are U.S. or Canadian citizens
Number of Suppliers with Clauses in Contracts Related to Local Employment	0	0	Not applicable	
TURNOVER				
Total Number of Employees Who Left the Organization Voluntarily	11		2	
Total Number of Employees Who Left the Organization Due to Dismissal	25		0	
Total Number of New Employee Hires	48		2	
Percentage of Open Positions Filled by Internal Candidates	0		0	
LABOR UNIONS				
Number of Employees Covered by Collective Bargaining Agreements	0		0	There are no unionized employees at either NOVAGOLD or Donlin Gold LLC
Days Lost to Strike Action	0		0	
TRAINING				
Hours of Environmental Training for Employees and Contractors	6		Not applicable	
Hours of Health, Safety, and Emergency Response Training for Employees	310		Not applicable	
Hours of Health, Safety, and Emergency Response Training for Contractors	0		Not applicable	

ITEM	DONLIN GOLD LLC		NOVAGOLD	COMMENTS
	TOTAL OR			
	LOW (IF APPLICABLE)	HIGH (IF APPLICABLE)		
LOCAL EMPLOYMENT PLAN				
Is a Local Employment Plan in Place?	Yes		Not applicable	For Donlin Gold LLC, this relates to local land agreement/shareholder hire agreements with Calista and TKC
HEALTH AND SAFETY				
Near Misses	3		0	
First Aid / Minor Injury	6		0	
Medical – Days of Restriction	0		0	
Hours Worked – Employees and Contractors	148,048		0	
LTIFR	0		0	Lost Time Incident Frequency Rate is defined using the calculation of number of lost-time injuries per one million employee hours worked
TRIFR	0		0	Total Recordable Incident Frequency Rate is defined as an incidence rate of lost-time injuries, fatalities, and medical incidents and is computed using the formula: (number of injuries and illnesses X 200,000) / employee hours worked = medical incidence rate. Note: "200,000" represents the number of hours 100 employees work based on 40 hours per week, 50 weeks per year, and provides the standard base for calculating the incidence rate for an entire year
HUMAN RIGHTS				
Number of Employees Trained on Human Rights	49		13	
Number of Human Rights Grievances Escalated to Human Resources	0		0	
BUSINESS ETHICS				
Number of Reportable Code of Conduct Breaches Reported in the Fiscal Year	0		0	
Number of Hours of Training on Anti-Corruption Received in the Fiscal Year	49		Not applicable	

* Excludes Alaska and Y-K region suppliers.

ITEM	DONLIN GOLD LLC		NOVAGOLD	COMMENTS
	TOTAL OR			
	LOW (IF APPLICABLE)	HIGH (IF APPLICABLE)		
PURCHASES				
Purchases from Regional Suppliers – \$USD	\$ 171,895.76		Not applicable	Goods / Services from Y-K region
Purchases from Local Suppliers – \$USD	\$ 9,081,127.07		Not applicable	Regional and Local (Alaska)
Purchases from National Suppliers – \$USD	\$ 4,995,147.95		Not applicable	Regional, Local, and National (U.S.)
Purchases from International Suppliers – \$USD	\$ 8,487,125.36		Not applicable	International only
SUPPLIERS				
Number of Regional Suppliers	580		Not applicable	“Regional” is defined as Y-K region
Number of Local Suppliers	894		Not applicable	“Local” is defined as Alaska
Number of National Suppliers	556		Not applicable	Regional, Local, and National (U.S.)
Number of International Suppliers	241		Not applicable	International only
Local Procurement Plan in Place	0		Not applicable	NOVAGOLD has contracting preferences in life-of-mine agreements with Calista and TKC
GRIEVANCES RECEIVED				
Human Rights (Automatically Escalated)	0		0	
Unmet Obligation	0		0	
Resettlement / Relocation	0		0	
Land Compensation	0		0	
Land Encroachment	0		0	
Land Access	0		0	
Property Damage	0		0	
Road Quality	0		0	

ITEM	DONLIN GOLD LLC		NOVAGOLD	COMMENTS
	TOTAL OR			
	LOW (IF APPLICABLE)	HIGH (IF APPLICABLE)		
Driving / Speeding	0		0	
Security Behavior	0		0	
Employee Behavior	0		0	
Contractor Behavior	0		0	
Contractor Payment Problems	0		0	
Local Procurement / Contracting	0		0	
Local Employment	0		0	
Spills	0		0	
Water	0		0	
Dust	0		0	
Emissions	0		0	
Noise / Light	0		0	
Vibrations	0		0	
Other	0		0	
GRIEVANCES RESOLUTIONS				
Total Number of Grievances Remaining from the Previous Period	0		0	
Total Number of Grievances Received	0		0	
COMMUNITY ENGAGEMENT				
Number of Engagements with Local Community Members	17,023		Not applicable	For Donlin Gold LLC, this is tracked across more than 56 communities in the Y-K region.

ITEM	DONLIN GOLD LLC		NOVAGOLD	COMMENTS
	TOTAL OR			
	LOW (IF APPLICABLE)	HIGH (IF APPLICABLE)		
COMMUNITY INVESTMENT – DONLIN GOLD PROJECT ONLY				
Health – \$USD	\$ 385,503		Not applicable	All NOVAGOLD investments are made through Donlin Gold LLC under the partnership with Donlin Gold Holdings. Therefore, NOVAGOLD provides 60 percent of the funds for the Donlin Gold LLC investments.
Education – \$USD	\$ 325,969		Not applicable	
Arts, Culture & Sports – \$USD	\$ 444,440		Not applicable	
Environment – \$USD	\$ 55,100		Not applicable	
Economic Development – \$USD	\$ 37,008		Not applicable	
Infrastructure – \$USD	\$ 0		Not applicable	
Water Infrastructure – \$USD	\$ 0		Not applicable	
Community Engagement – \$USD	\$ 0		Not applicable	
Other – \$USD	\$ 0		Not applicable	
Scholarships Provided – Quantity	\$ 128,000		\$ 15,263	
Compensation Payments – \$USD	\$ 0		Not applicable	

2025 CORPORATE GOVERNANCE PERFORMANCE

For additional details on NOVAGOLD's corporate governance practices, please see the most recent management information circular dated March 24, 2026 and posted to www.sec.gov, www.sedarplus.ca or the NOVAGOLD website [here](#).

GOVERNANCE ITEM	VALUE
GENERAL	
Location of Corporate Office	Vancouver, B.C., Canada; Salt Lake City, UT, USA
Description of Services / Products	Gold mine developer
Location of Projects	Alaska
Status of Operations	Development stage
Ownership	Publicly traded corporation organized under the laws of British Columbia, Canada, and trading on the NYSE American and TSX stock exchanges under the symbol NG
Does the Company have an Enterprise Level Environmental Policy?	Yes. Applicable policy: Environmental Policy.pdf
Global Compact Signatory	No
Memberships in Associations	Alaska Miners Association, Alaska Metal Mines, National Mining Association, Resource Development Council (Alaska), and American Exploration and Mining Association (national)
Statement from Senior Decision Maker	See President and CEO Message in this report
Values, Principles, Standards, and Norms of Behavior	See Code of Business Conduct and Ethics.pdf and Code of Business Conduct
Does the Company have a Publicly Disclosed Code of Conduct?	Yes. Applicable policy: Code of Business Conduct and Ethics.pdf
Mechanisms for Advice and Concerns about Ethics	Yes. Applicable policy: Code of Business Conduct and Ethics.pdf
Whistleblower Policy or Programs, including Confidential Hotline and Stated Protection of Whistleblowers	Yes. Applicable policy: Code of Business Conduct and Ethics.pdf
Process for Delegating Authority for Economic, Environmental, and Social Topics from the Highest Governance Body to Senior Executives and Other Employees	Yes. Applicable policy: See pages 91-100 of Management Proxy Circular dated March 24, 2026
Board Member or Board committee Responsible for ESG Issues	Applicable resources: Corporate Governance & Nominations Committee Charter.pdf , Engineering & Technical Committee Charter.pdf , and Sustainability Committee Charter.pdf

GOVERNANCE ITEM	VALUE
Composition of the Highest Governance Body and its committees	The Board is the highest governing body, consisting of 10 director seats. Eight of the ten directors in 2025 are independent. There are five standing committees: Audit; Compensation; Engineering & Technical; Corporate Governance and Nominations; and Sustainability. Read more here .
How many Women / What Proportion of Women are on the Board	3 of 10, or 30%
How many Directors Serve on the Board	10 seats
Board Diversity and Board Independence	Yes. Page 91-94 of Management Information Circular dated March 24, 2026 regarding Board independence and page 40 regarding Board diversity
Diversity Programs	See pages 91-94 of Management Information Circular dated March 24, 2026
Chair of the Highest Governance Body	Dr. Thomas S. Kaplan, Chairman of the Board
The Classification of the Board Chair	Non-independent
Does the Board have an Independent Lead Director?	Yes. Dr. Elaine Dorward-King serves as the Board's Independent Lead Director
Conflicts of Interest	See pages 91-95 of Management Information Circular dated March 24, 2026 and the Code of Business Conduct and Ethics.pdf
Role of the Highest Governance Body in Setting Purpose, Values, and Strategy	See pages 91-100 of the Management Information Circular dated March 24, 2026
Collective Knowledge of Highest Governance Body	The Board is the highest governance body; see biographies of Directors here and additional Director background in the Management Information Circular dated March 24, 2026
Evaluation of the Highest Governance Body's Performance	See page 94 of the Management Information Circular dated March 24, 2026
Remuneration Policies	See the Compensation Discussion & Analysis section beginning on page 32 of the Management Information Circular dated March 24, 2026
Responsibility for Board and Executive Compensation	See pages 32-76 of Management Information Circular dated March 24, 2026 and the Compensation Committee Charter.pdf and the Board Charter.pdf
Process for Determining Remuneration	See Compensation Discussion and Analysis and Non-Executive Director Compensation on pages 32 through 76 in the Management Information Circular dated March 24, 2026
Has the Company Adopted an Advisory Executive Compensation "Say on Pay" Vote? ¹	Yes, vote held annually

1. In 2025 shareholders cast 83.72% of votes in favor of "Say on Pay".

GOVERNANCE ITEM	VALUE
Approach to Shareholder Engagement	Maintaining an active shareholder engagement program is a high priority for the Company and is an integral part of our corporate governance practices. The Board Chair, CEO, and Vice President of Corporate Communications meet regularly with large shareholders, and the Company's Corporate Communications team is very responsive to shareholder inquiries regardless of ownership level. In 2025, NOVAGOLD placed calls to or met in person with all of its shareholders owning 40,000 shares or more; in other words, NOVAGOLD contacted or attempted to contact its owners holding approximately 84% of the Company's issued and outstanding Common Shares entitled to vote at NOVAGOLD's 2025 annual meeting of shareholders. We plan to continue to regularly engage with our shareholders.
Date of Most Recent Annual Financial Report	Annual Report on Form 10-K filed January 22, 2026
Financial Reporting Cycle	2025 annual financial results reported January 22, 2026. Q1 2026 financial report on Form 10-Q filed April 1, 2026; additional Form 10-Q filings planned in June 2026 and October 2026.
Sustainability Reporting Cycle	Sustainability Report issued annually
Contact Point for Questions Regarding ESG Disclosure	Communications Department: info@novagold.com or Telephone: 604-669-6227; Toll-free: 1-866-669-6227
HUMAN RIGHTS	
Human Rights Policy and Scope	See Human Rights Policy.pdf
Does the Company's Human Rights or Other Formal Policy Cover Community Consultations and Indigenous Rights?	Yes
Number of Grievances about Human Rights Filed, Addressed, and Resolved through Formal Grievance Mechanisms	0
Incidents of Discrimination and Corrective Actions Taken	0
Anti-Discrimination Policy	See page 95-96 in the Management Information Circular dated March 24, 2026 and the Code of Business Conduct and Ethics.pdf
Operations and Suppliers at Significant Risk for Incidents of Child Labor	No. All operations and suppliers are located in and operated under U.S. or Canadian regulations and labor standards
Does the Company's Code of Vendor Conduct Address Child Labor?	No. NOVAGOLD does not have a Code of Vendor Conduct; see Human Rights Policy.pdf
Operations and Suppliers at Significant Risk for Incidents of Forced or Compulsory Labor	No. All operations and suppliers are located in and operated under U.S. or Canadian regulations and labor standards
Does the Company's Code of Vendor Conduct Address Forced Labor?	No. NOVAGOLD does not have a Code of Vendor Conduct; see Human Rights Policy.pdf
Incidents of Violations Involving Rights of Indigenous Peoples	0
Operations that have been Subject to Human Rights Reviews or Impact Assessments ¹	0
Employee Training on Human Rights Policies and Procedures	All NOVAGOLD employees affirm their commitment to the Code of Business Conduct and Ethics annually

1. At Donlin Gold LLC, all employees have been trained in human rights. No grievances at either NOVAGOLD or Donlin Gold LLC were escalated to legal in 2025.

GOVERNANCE ITEM	VALUE
ANTI-BRIBERY, ANTI-CORRUPTION, AND ANTI-FRAUD	
Anti-Bribery, Anti-Corruption, and Anti-Fraud Policy	Anti-Corruption Anti-Bribery Anti-Fraud Policy.pdf
Highest Level of Executive Oversight for the Company's Anti-Bribery or Anti-Corruption Program	Company Ethics Officer (Vice President and CFO)
Number of Grievances about Anti-Corruption and Anti-Bribery, Addressed and Resolved through Formal Grievance Mechanisms	0
Operations Assessed for Risks Related to Corruption	Not applicable
Does the Company Provide Anti-Corruption Training to all Employees, Including Management?	All NOVAGOLD employees affirm their commitment to the Code of Business Conduct and Ethics annually
Confirmed Incidents of Corruption and Actions Taken	0
Payments to Governments	Not available yet