



BMC MINERALS LTD

June 29, 2026

Monica Nordling, A/ Manager, Major Mines Licencing
Mineral Resources Branch
Department of Energy Mines and Resources
Government of Yukon
211 Main Street
Whitehorse, YT Y1A 2B2

Dear Ms. Nordling,

Re: Quartz Mining License Application KZK Mine Project, Information Request 7 – Socio-economic Plan, Completeness Review Phase 2

BMC received your Information Request 7 (IR7) (Phase 2 Review) on our Quartz Mining Licence Application on May 29th, 2026, which was specific to BMC's Socio-economic Management Plan (SEMP) (Rev 00). We have reviewed the IR in detail and where appropriate have updated the SEMP (attached is Rev 01). A Table of Revisions has been added to the SEMP which lists each individual IR and how and where in the SEMP the IR has been addressed. In some instances, the IR did not result in a change to the SEMP and/or additional context/response related to an IR was considered warranted, for these IRs BMC has prepared responses (below).

1. Editorial

IR7-1: The SEMP should follow the prescribed guidance format and numbered headings as closely as possible; any deviation must be clearly identified and justified with a documented rationale.

BMC Response: BMC has updated the SEMP following the format and numbered headings as closely as possible. Minor deviations and rationale (where considered appropriate) are as follows:

- Guidance asks for Glossary to be Chapter 16, we have added it to the beginning of the document;
- Guidance asks for Appendices to be Chapter 17, we have added them after the references Chapter;
- Guidance asks for Chapter 11 to be entitled "Community Impacts" and we have called it Community Vitality which is consistent with the Valued Component assessed in the YESAB Assessment. Also, "Community Impacts" has a negative connotation and BMC would prefer a more neutral title consistent with the other Valued Component chapters;
- Guidance asks for two chapters related to Community Health: Chapter 11 (Community Impacts) and Chapter 14 (Worker and Community Health and Safety). The requested contents for each have some overlap and BMC has (in some instances) added content to each chapter based on where it fit best for document flow. This has resulted in some topics presented in Chapter 13 whereas the guidance document requests it in Chapter 11 and vice versa; and

- Many of the sections of the guidance document request that monitoring be described. In order to avoid duplication all monitoring is presented in Chapter 15.

Deviations from the guidance are tracked in the updated Table of Concordance attached to this response letter.

The SEMP re-organization resulted in most section references of the IRs no longer being accurate. Where applicable the updated section numbers are included in the SEMP Table of Revisions and in the responses below (where applicable). The Table of Concordance with commitments from the YESAB Assessment Process and Decision Document Terms and Conditions has also been updated (Appendix D of the SEMP).

IR7-3: Provide context and background information regarding the form and function of the committees introduced in Section 3.1 (i.e., Management Advisory Committee, Heritage Management Committee, and Environmental Committee). Include information on the purpose of each of these committees, as well as providing the specifics of how they were formed and how they will operate moving forward.

BMC Response: Additional context regarding the form and function of the committees has been added to Section 3.5.1 (to the extent that confidentiality allows). However, it should be noted that these committees have yet to be formed. The Management Advisory Committee has not been formed at the request of RRDC; and BMC raises this requirement with them on an annual basis. The Culture and Heritage Management Committee and the Environmental Committee are a component of the proposed modernized SEPA, which is still on the table for negotiation. The specific details of how they will operate moving forwards will largely be up to Kaska.

IR7-8 Language when referring to First Nation People should remain consistent throughout the plan; remove mentions of “Aboriginal” or “Indigenous,” except when citing an Act.

BMC Response: Use of Aboriginal, First Nations and Indigenous have specific definitions within the context of the SEMP, and these terms have been added to the glossary for clarity. For further clarity examples include:

1. Terms and Conditions of the Decision Document – in some instances the condition is specific to Aboriginal rights;
2. References to Statistics Canada vs Yukon Bureau of Statistics – Federally Statistics Canada uses “Aboriginal” whereas Yukon Bureau of Statistics uses “First Nations”; and
3. BMC’s Policies – these typically use the more internationally recognized term ‘Indigenous’.

IR7-25: Clarify how “there are no mine hazards that could plausibly impact land users” (Concordance Table 14.10). Note that the EC has identified impacts on communities and traditional land use in the Final Screening Report that should be addressed in the SEMP. Hazards beyond physical hazards should be considered.

BMC Response: Table of Concordance with Yukon Government’s Guidance has been updated and the text removed (Table 1 attached to this response).

2. Engagement

IR7-30: As per the Annotated Outline please provide a summary of the input received from each organization (engagement summaries) and how it was incorporated into the plan.

BMC Response: The requested summaries are provided in Appendix C (Table 3) of the SEMP. To maintain confidentiality of each organization's comments, the summaries have been prepared by grouping organizations who have similar interests and/or mandates. This approach was discussed with Ms. Nordling on June 12, 2026 and in that discussion the approach was approved.

IR7-33: Provide additional information on the signed Traditional Knowledge Protocol and specifics of the monitoring program for identifying any new potential effects (Section 2.6.2). Please also clarify how these new potential effects will be defined (e.g., effects on the Project or effects of implementing the Traditional Knowledge).

BMC Response: The first paragraph of Section 4.6.2 has been re-written for clarity, the focus of the Traditional Knowledge (TK) Protocol was for RRDC to identify, and propose mitigations based on their TK study and this was completed during the YESAB assessment. For further clarity, the TK Protocol does not have a monitoring aspect for identifying new potential effects. New potential effects are intended to be addressed in the Culture and Heritage Management Program that has been proposed as part of the modernized SEPA. As described above the proposed process has yet to be agreed upon by Kaska and may change based on their feedback. However, if new effects and/or mitigations are identified by RRDC through any ongoing TK work, BMC will consider them on a case-by-case basis following the intent of the TK protocol and proposed Culture and Heritage Management Program.

The TK Protocol is specific to the effects of the Project, not the effects of implementing the Traditional Knowledge.

IR7-36: Provide clarification on how and when MRB will be notified about a modernized SEPA so the license and plan can be amended to reflect the new agreement, if necessary.

BMC Response: Section 3.5.1 has been updated to clarify that BMC will notify MRB in writing if a modernized agreement(s) is executed. The specific timing of when this will happen is uncertain as there are no timelines associated with the negotiations, much like there are no timelines with Crown consultation.

3. Human Health and Wellbeing

IR7-39: Consider creating and adding an EAP policy to Section 1.4.1 to increase clarity regarding this program

BMC Response: The Employee Support Policy (Appendix A) commits BMC to the EAP program. Additional clarity on the program is provided in the SEMP (Section 14.1, 14.4 and Appendix F) in response to IR7-38.

5. Tourism and Culture

IR7-50: BMC should consider including other tourism stakeholders in the SEMP including:

- Tourism Industry Association of the Yukon (TIAY)
- Yukon First Nations Culture and Tourism Association (YFNCT)
- Wilderness Tourism Association of the Yukon (WTAY)

BMC Response: Tourism Industry Association of the Yukon and Yukon First Nations Culture and Tourism Association were identified as having a potential interest in engaging on the SEMP development (Table 3-4 of the SEMP). Tourism Industry Association of the Yukon participated while Yukon First Nations Culture and Tourism Association indicated they didn't have capacity to provide input. Wilderness Tourism Association of the Yukon has been added as requested (Section 3.5 of the SEMP).

Please let me know if you have any additional questions related to SEMP.

Regards,

A handwritten signature in blue ink, appearing to read 'K. Kelly', is positioned below the 'Regards,' text.

VP Environment & Permitting

Table 1: Socio-economic Management Plan: Table of Concordance with Yukon Government’s Annotated Outline for the SEMP

Heading Number and Description in Annotated Outline	Where addressed in SEMP Rev01
1. Executive Summary	
• Provide an executive summary that presents an overview of the main points in this plan. Executive summaries are an important part of a large report and may be the only part of the report that some users read. As such, plain language should be used.	Chapter 1
2. Introduction, Purpose and Objectives	
• Include an overview and background of the plan and the necessity of a socio-economic plan.	Chapter 2
• Outline the structure of the plan including an overall summary of what the plan aims to achieve and how it will be implemented.	
• Provide a brief statement presenting the purpose of the plan.	
• Summarize the objectives and goals (refer to the section on “how this plan will be used” for a list of some objectives).	
• Describe the importance and expectations for this plan.	
3. Plan Development and Implementation	
• Provide relevant corporate background information on BMC Minerals Ltd. Outline who developed and is responsible for the plan, who is responsible for implementing and updating the plan, and provide relevant contact information.	Section 3.1 Table 3-5 outlines BMC’s responsibilities and departments that will be involved in updating and implementing the SEMP. Specific names and contact information are currently unknown. The SEMP will be updated with this information when the QML is issued and BMC has filled these roles.
• Describe the geographic scope of the plan in terms of First Nation Traditional Territories, communities and major Yukon geographic elements. Indicate which First Nations are affected by the project and why (e.g., land claims agreement, asserted claim, proximity to the site) as well as affected Yukon communities. Include maps or other visual aids to support the descriptions.	Section 3.2
• Describe the processes of First Nation and community engagement and deliberations that were undertaken for the development of the plan. Summarize the reason for each party’s involvement in engagement (e.g., proximity to site, land claims, land users, etc.). Describe the input received and how it was incorporated into the plan. Describe how First Nations and community engagement and deliberations will be undertaken during implementation. Indicate how diversity and gender equality were considered in engagement activities. Include a table of engagement activities listing dates, who was engaged, topics of engagement and key outcomes.	Section 3.5, Appendix C
• Describe the formation and make up of any committees, councils or associations of community members that were engaged in the development of this plan or that will be engaged during the mine life.	Section 3.5, Section 3.7
• Describe any existing agreements between BMC and First Nations related to social or economic benefits and	Section 4.6

Heading Number and Description in Annotated Outline	Where addressed in SEMP Rev01
impacts, subject to confidentiality provisions. If none exist outline any agreements that are planned or anticipated during the mine life.	
Briefly describe any corporate or mine-site level policies that relate to social or economic aspects of the mine such as policies on sustainability, communications, or community benefits. Include the policies in an appendix.	Section 3.1, Appendix A
Indicate how the contents of this plan and progress made to meeting the commitments or statements within the plan will be communicated. Outline the roles and responsibilities for communication and describe the feedback mechanism.	Section 3.7
Describe the monitoring plan and annual reporting plan including sources of data, how the data will be collected, how progress will be measured and who is responsible.	Chapter 15
Outline the process to adapt and update the plan in response to monitoring and measuring its progress and effectiveness and from feedback.	Section 15.3, Section 3.7
4. Compliance Obligations	
Outline how this plan satisfies the socio-economic proponent commitments contained in the Screening Report, and terms and conditions of the YESAB Decision Document. Include a concordance table that shows how or where these are addressed in the plan.	Appendix D, Section 4.2, 4.3
- Outline how this plan has considered other Yukon legislation, such as the Public Health and Safety Act - and Workers' Safety and Compensation Act and their associated regulations.	Section 4.3, 4.4, 4.5
Describe, subject to confidentiality provisions, the components of any socio-economic agreements with First Nations or communities, if any.	Section 4.6
5. Mine Description and Socio-Economic Overview	
Provide a description of the mining operation including mine components, layout, ancillary infrastructure, production rates and mine life schedule.	Section 5.1
Describe physical aspects of the mine that may impact the socio-economic framework of the area such as those related to culture and way of life, land use, water, air, noise, and transportation and impacts to any community involvement in mining (such as placer).	Section 5.1
Include maps of the mine layout and ancillary infrastructure at various stages of the mine life including one that shows the maximum disturbance and one that illustrates the site post-closure.	Section 5.1
Describe the overall socio-economic framework of the region. Outline aspects such as population, demographics, economy, local business environment, employment, housing, education, health, infrastructure, public facilities (e.g., schools, clinics), and services.	Section 5.2
Describe the traditional economy and current local economy of the region to the depth possible.	Section 5.2.5
6. Employment and Training	
Describe and breakdown the workers at the mine site for all phases of the mine. Provide brief descriptions of position in management, professional, skilled, semi-skilled and entry-level. Outline the workers that will be employees and those expected to be contractors. Provide projections for representative groups in all positions (e.g., Yukoners, out-of-territory residents, first nations, women, etc.). Include tables or graphs that show numbers	Section 6.1, Appendix E

Heading Number and Description in Annotated Outline	Where addressed in SEMP Rev01
and changes in employment over the life of the mine.	
Describe the recruitment strategy for mine employees including plans for local and regional recruitment and recruitment of First Nation citizens. Outline plans and commitments to ensure diversity, equity and inclusion in hiring. Describe how job opportunities will be communicated and advertised.	Section 6.1 A more detailed recruitment strategy, including a DEI plan, will be developed once the QML has been issued and BMC has made the decision to construct the Project, and details of this strategy will be provided in later versions of the SEMP.
Outline the anticipated indirect employment resulting from the mine operation including the range of positions and where those workers will be located.	Section 6.1.2
Describe where employees will live including accommodation, transportation, and traffic management.	Section 11.1, 11.5, 6.1, 11.5.2 and Traffic Management Plan
Describe plans to provide time off for employees to exercise their Aboriginal rights and for traditional and cultural activities.	Section 9.2
Provide an outline of the employee benefits program including extended medical plans that will provide support for physical and mental health and financial management.	Section 14.1, 14.2
Describe the employee retention plan and how employee satisfaction will be monitored.	A specific employee retention plan and associated monitoring will be developed once the QML has been issued and BMC has made the decision to construct the Project, and can be provided in later versions of the SEMP.
List and, where available, include human resources policies that will apply to workers.	Appendix A A more detailed and specific HR policy will be developed once the QML has been issued and BMC has made the decision to construct the Project, and this policy can be provided in later versions of the SEMP.
Outline the harassment (including sexual harassment), discrimination, gender-based violence and bullying codes of conduct, and the policies and procedures for reporting on such incidents.	Chapter 14
Describe the plans to support workers during closure and the post-mining transition and support for employees in the case of sudden or temporary closure. This should include any employee assistance and transition support such as retraining or upskilling, relocation support and activities to support the mental health of workers and their families.	Chapter 12
Outline the worker training plan including how employees will be supported to improve and advance their employment. Outline any plans for apprenticeships or mentoring programs. Indicate who will conduct the training and where it will take place and any use of local facilities or institutions.	Section 6.2
Outline training that will support a safe, respectful, and inclusive workplace including cultural and First Nation awareness and aspects related to harassment and prevention of gender-based violence. Indicate who will develop	Section 11.2, Chapter 14

Heading Number and Description in Annotated Outline	Where addressed in SEMP Rev01
the program, how it will be delivered, targeted participants and the expected training schedule. Include a table of expected training modules or programs.	More detailed training plans will be developed once the QML has been issued and BMC has made the decision to construct the Project, and details of these plans can be provided in later versions of the SEMP.
7. Economic Benefits to Governments	
Describe and estimate the taxes, royalties and other payments that will be made to First Nation, local, territorial, and federal governments (subject to confidentiality agreements). Include tables that outline expected payments during the mine life. This section should focus on payments to governments rather than community benefits which are discussed in section 10.	Chapter 7
8. Procurement Strategy	
Outline the overall procurement strategy for services and supplies including a breakdown of the expected types of services and supplies and the annual spend. Include tables to support this section.	Chapter 8
Describe the local service and supply strategy such as local contracting opportunities and the support that will be provided to ensure that local services and suppliers are positioned to submit competitive bids.	Chapter 8
Describe any existing or expected agreements with local businesses to support the mine such as food supplies, equipment, maintenance and technical services.	Chapter 8
9. Traditional Land Use and Cultural Heritage	
Outline the cultural diversity of affected First Nations including traditional languages, relationship with the lands and waters, and ways of life.	Section 9.1
Describe any lands in proximity or within the mine area that have traditional or cultural value.	Section 9.1
Describe existing traditional land use activities including hunting and harvesting, use of seasonal camps, and cultural activities.	Section 9.1
Summarize the mine's expected effects on traditional land use and cultural heritage and the measures planned to minimize these effects.	Section 3.3, 9.2
Describe how the effects of the mine on traditional activities will be monitored. Outline how this plan will be adapted to address the outcome of monitoring.	Chapter 15
Outline any expected effects on the traditional economy of the region and any plans to mitigate these effects.	Section 9.2
Describe any support, both on and off the mine site, that will be provided by the proponent for traditional and cultural activities and land use and traditional knowledge (e.g., time off; facilities/camps).	Section 9.2
Describe the use of traditional monitors, land guardians or elders who will monitor impacts of the mine on tradition land use and cultural activities. Outline how the work of monitors will be integrated into assessment and updates to this plan.	Section 9.2
10. Community Contributions and Benefits	
Describe the overall economic, social and financial benefits of the mine to local communities, First Nations, and the territory as a whole and any specific economic contributions or benefits.	Section 10

Heading Number and Description in Annotated Outline	Where addressed in SEMP Rev01
Outline the direct and indirect benefits the mine expects to provide to local communities and First Nations. This should include aspects such as capacity funding, education and training, apprenticeships and scholarships, support for cultural and traditional activities on and off the mine site, support for infrastructure development or for local institutions. Make use of tables as appropriate.	Section 4.6.1, 10, 6.2
Describe how contributions and benefits will be determined and who will be engaged and involved in decision making.	To date, community contributions have been determined on a case by case basis. A specific policy will be developed once the QML has been issued and BMC has made the decision to construct the Project, and can be provided in later versions of the SEMP.
Outline any plans for community benefits and support during closure and the post-mining transition and how those will be determined.	Chapter 12
11. Community Impacts	
Describe the overall expected direct and indirect impacts to communities.	Section 3.3
Describe any population changes that are expected due to the mine and the impacts of those population changes. Outline measures to monitor and report any impacts (see additional points below).	Section 11.1
Outline any potential increases in crime, drug or alcohol use or introduction/increase in sex work or sexual violence due to the mine and how those increases will be monitored and reported.	Section 11.3, Chapter 14, Chapter 15 (Monitoring)
Describe expected transportation impacts of the mine on local communities whether direct, or indirect and the strategy to minimize or eliminate impacts including the monitoring plan.	Section 14.4, Chapter 15 (Monitoring)
Describe any expected noise impacts to communities and the monitoring and reporting of these impacts. Refer to territorial or national noise standards.	Noise monitoring and reporting are described in the Environmental Monitoring, Surveillance and Reporting Plan and Adaptive Management Plan, Linkage is described in Section 3.4
Describe any air quality impacts including dust and the monitoring and reporting plans to track these impacts. Refer to territorial or national air quality standards.	Air Quality monitoring and reporting are described in the Environmental Monitoring, Surveillance and Reporting Plan and Adaptive Management Plan, Linkage is described in Section 3.4
Outline any potential increases on demand for housing due to changes in local population resulting from the mine. Outline how these impacts will be mitigated and monitored.	Section 11.5.1, Chapter 15 (Monitoring)
Describe any expected demands on local health services, social services and emergency services resulting from the mine and how those impacts will be managed.	Section 11.5.4
Describe any expected increases in demand for schools and childcare, the ability of the community to accommodate these increases and plans to monitor and report these impacts.	Section 11.5.6
Outline expected demand for community services and businesses (e.g., hospitality, hardware/mechanical, groceries, fuel, etc.) and any plans to monitor and report on available services. Describe any mine-specific impacts to local businesses and employment.	Section 11.2, Chapter 15 (Monitoring)
Describe the community feedback mechanism that will allow community members to express concerns about	Chapter 15

Heading Number and Description in Annotated Outline	Where addressed in SEMP Rev01
impacts of the mine and how the feedback will be managed and who is responsible.	
12. Closure and Post-Mining Land Use	
Provide a short description of the overall closure plan for the mine site including reclamation activities and proposed post-mining land uses. Indicate how pre-mining traditional land use and cultural activities may be accommodated at the closed site.	Chapter 12
Outline the expected social and economic impacts of closure on local communities and First Nations and how those impacts will be mitigated and managed. Describe how communities will be supported during the closure transition.	Chapter 12
Outline closure monitoring plans and the role of local communities and First Nations in those monitoring activities.	Chapter 12
Describe how local communities and First Nations have been, and will continue to be, engaged and part of the decisions making process for closure and post-mining land uses including the use of any closure committees.	Chapter 12
13. Canadian and International Reporting Standards	
This section should list and describe any Canadian or international ESG or similar reporting standards that the mine or proponent reports on such as Toward Sustainable Mining, the Global Reporting Index or the Extractive Industries Transparency Initiative. Describe how these standards compliment the plan. Include recent reports in appendices.	Commitments to ESG Standards will be made following receipt of key Project licences and Project approval by the BMC Board of Directors.
14. Worker and Community Health and Safety	
Describe the mine health services plan including the facilities, equipment and the number and expertise of employees. Outline any counselling and mental-health programs and approaches to support workers impacted by harassment (including sexual harassment) or gender-based violence either on the mine site or at home.	Chapter 14
Outline how health services staff at the mine will be trained to identify and address mental health, gender-based violence, domestic/occupational abuse, and drug and alcohol use.	Section 14.5.1
Describe the emergency healthcare options available to worker in the case of drug poisoning, and how accessible/timely that care is.	Details of worker health and safety are provided in the Emergency Response and Health and Safety Plan. Linkage is described in Section 3.4
Describe the type and amount of barrier-free harm reduction equipment on site (e.g., drug checking, naloxone kits, educational materials)	Details of worker health and safety are provided in the Emergency Response and Health and Safety Plan. Linkage is described in Section 3.4
Describe any types of harm reduction training offered to staff (e.g., use of naloxone kits)	Details of worker health and safety are provided in the Emergency Response and Health and Safety Plan. Linkage is described in Section 3.4
Describe any expected use of community health services by mine workers, how that may impact the community and plans to monitor and report these impacts.	Section 11.5 and Chapter 15 (Monitoring)
Outline any predicted impacts that the mine will have on the health of nearby communities, such as those related to air, noise, or water. Describe how these impacts will be minimized, mitigated, and monitored. Include reference to territorial, and/or federal standards and thresholds.	Monitoring and adaptive management for air, noise, water etc. near the Project are discussed in other management plans. Linkage is described in Section 3.4

Heading Number and Description in Annotated Outline	Where addressed in SEMP Rev01
Outline any expected impacts to mental health within the community. Describe how those impacts will be measured and monitored and the plans to support and report the impacts that result from the mine.	Section 14.2, Chapter 15 (Monitoring)
Describe the indicators that will be used to monitor community health.	Chapter 15
Summarize programs or initiatives taken to minimize mine hazards that could affect nearby land users or communities.	Section 14.4
Describe any site-specific hazards and how the risks are mitigated.	Section 14.5
15. Evaluation, Adaptive Management and Revisions	
Outline the process to adapt and update the plan in response to monitoring and measuring its progress and effectiveness and from feedback.	Section 15.3, 3.7
Describe how the community and First Nations will be involved in this process to ensure their input is considered and incorporated.	Section 3.7
16. Glossary	
Include a glossary of key terms and concepts used in the plan.	Glossary
17. Appendices	
Include any corporate or mine-site level policies that relate to social or economic aspects of the mine such as policies on sustainability, communications, or community benefits (see section 3)	Appendix A, B
Include copies of any Canadian or international ESG or similar reporting standards that the BMC Minerals reports on such as Toward Sustainable Mining, the Global Reporting Index or the Extractive Industries Transparency Initiative (see section 13).	Commitments to ESG Standards will be made following receipt of key Project licences and Project approval by the BMC Board of Directors.
Include additional appendices as needed to support the content of this plan.	Appendix C and Appendix F