



KUDZ ZE KAYAH PROJECT

SOCIO-ECONOMIC MANAGEMENT PLAN

REV 01

June 2026

BMC MINERALS LTD.

This Management Plan has been developed to meet the appropriate subject objectives based on existing regulatory requirements, current or planned site activities, existing and expected site conditions, and designed outcomes at the time of writing. Operational processes/practices for achievement of licence terms and conditions may be updated from time to time as appropriate due to changes to relevant legislation and regulations, changes to site activities or conditions, differences from expected objective outcomes, or improvement of management practices. All rates, capacities, dimensions, weights, volumes and durations in text or figures are based on current feasibility level designs and are subject to change based on final design, licence conditions or site conditions encountered. Updates will be resubmitted to government authorities and/or stakeholders as required.

LIST OF REVISIONS

Issue Date	Revision Number	Description
September 20, 2024	Rev 00	Prepared in response to Phase 2/3 IR from EMR dated May 5, 2023
June 29, 2026	Rev 01	Updated in response to Phase 7 IR from EMR dated May 29, 2026

SUMMARY OF REVISIONS

Information Request	Document	Section	Revision
Revision 01			
EMR EMR 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.	Socio-Economic Management Plan (SEMP)	All	The SEMP has been re-organized.
EMR IR7-2 Provide a summary of the SEMP, describing how the SEMP will be implemented and how each committee will be involved. Consider including a graphic element (e.g., a systems map) to provide an overview of the Plan at a glance.	SEMP	1	Summary of the SEMP and has been added. Additional graphics have been added throughout the plan.
EMR 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.	SEMP	4.6.1	Additional context regarding the form and function of the committees has been added (to the extent that confidentiality allows)
EMR IR7-4 The description of the SEMP working group is provided too late in the plan. Provide a high-level introduction to the SEMP working group earlier in the plan or move the entire section (7.2.4) describing the SEMP working group to an earlier point in the document.	SEMP	3.7	Moved text to earlier in the document
EMR IR7-5 Provide definitions or explanations in the Glossary for the following terms used throughout the plan: a. Valued Components b. Gross Domestic Product c. Qualified professional and qualified expert i. Explain the difference between these two terms. ii. Explain how these individuals are qualified, specifically regarding teaching cultural and First Nation awareness (Section 5.1.4), and gender appropriate and sexuality specific policies (Section 5.2.5.3). d. Microwave communications e. Other key terminology	SEMP	Glossary, 6.2	Added requested terms and definitions
EMR IR7-6 Text in Section 1 figures is not visible, and figures are not labelled to correspond with Table of Contents and in-text citations. Provide updated figures with correct text boxes.	SEMP	5	Figures have been updated

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Revision 01			
EMR IR7-7 All references of alcohol- or substance-“abuse” should be changed to alcohol- and substance-“use”.	SEMP	Throughout	All instances of substance or alcohol abuse have been replace with “use”
EMR 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.	SEMP	Glossary	Use of Aboriginal, First Nations and Indigenous have specific definitions within the context of the SEMP, these terms have been added to the glossary for clarity.
EMR IR7-9 In Figure 1-5, Whitehorse, Faro, Ross River, and Watson Lake are labelled as Local and Regional Study Areas, whereas they are referred to as Local and Regional Monitoring Areas in the main text of the plan. Please ensure that the term used are consistent between figures and the main text.	SEMP	3.2	Updated text and figure for clarity
EMR IR7-10 It is not made clear whether there is a difference between BMC’s Corporate Framework and the Business Integrity Framework (Section 1.4.1). If these Frameworks differ, outline the differences. If they are the same, ensure the terminology is consistent throughout the plan.	SEMP	3.1	Replaced “BMC’s Corporate Framework” with “Business Integrity Framework”
EMR IR7-11 In Section 3.2, the plan states that “Most organizations that participated in the engagement were excited about BMC coming into their area...” Management plans should endeavour to maintain a level of objectivity to them that this statement does not meet.	SEMP	3.5	Text has been deleted
EMR IR7-12 Consider rewording the sentence: “Ross River, Faro and Watson Lake all have relatively high proportions of their populations working in trades, transport, equipment operators and related occupations who are most likely to find employment on the Project during the Construction phase.” The current iteration of the sentence is confusing; a better way to word the sentence is: “The construction phase of the project will have more availability for roles in trades, transport, equipment operation, and related occupations as compared to operations and closure phases.”	SEMP	6.1.1	Updated text to “Ross River, Faro and Watson Lake all have relatively high proportions of their populations working in the trades, transport, equipment operation and related occupations. The Project will have high demand for these types of skills during all phases, with demand generally being the highest during the Construction phase”
EMR IR7-13 Remove the term “impossible” from the sentence “it is impossible to sign long term commercial agreements” (Section 5.1.6.2) and replace with a term that more accurately describes the situation and does not use absolutes.	SEMP	8.1	Term “impossible” has been removed

Information Request	Document	Section	Revision
Revision 01			
EMR IR7-14 The plan states that “BMC will have education and resources in place to support and/or eliminate sexual violence and suicide” (Section 5.2.2). The scope of this commitment is not made clear. There needs to be acknowledgment that education and resources alone will not eliminate these issues. BMC should recognize that policies are only one part of creating safer workspaces. Hiring community mentors is another. Neither may eliminate issues of discrimination or racism if a culture of safety is not created or maintained. Consider rewording to “BMC will have education and resources in place to address and help prevent sexual violence and suicide.”	SEMP	14.2	Updated text to “BMC will have education and resources in place to address and help prevent sexual violence and suicide.”
EMR IR7-15 The sentence “Whitehorse has nearly all, or more than, the government services and recreational infrastructure available in much larger centres in other parts of Canada” is missing a citation and is unclear in its message. Either remove this sentence or provide a citation and further clarification. (Section 1.3.4).	SEMP	5.2	Sentence has been removed
EMR IR7-16 Provide a citation for the following sentence: “make direct and indirect use of waters downstream from the proposed mine, both through drinking and through reliance on the fish and animal species who rely on those waters – which intersect important caribou and other ungulate and wildlife species movement corridors” (Section 1.3.5). When citing Kaska individuals, please provide references and citations for where this information was gathered and who is being cited.	SEMP	9.1	Reference added
EMR IR7-17 Provide a citation for the following sentence: “are still living with the negative impacts of five failed mines in Kaska territory – Faro, Cantung, Ketza, Sa Dena Hes, and Wolverine” (Section 1.3.5).	SEMP	9.1	Reference added
EMR IR7-18 Provide a citation for the following sentence: “Whitehorse has the capacity to readily absorb an increase in population caused by Project employees relocating from outside of Yukon” (Section 5.3.1).	SEMP	11.1	Reference added
EMR IR7-19 Clarify and provide citations for the SEMP’s stance on how the potential population increase will impact the housing market and community services in Faro.	SEMP	11.1	Text on impacts has been removed given that it is unknown how many employees will choose to relocate to Faro.

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Revision 01			
EMR IR7-20 Include acknowledgement of the Faro Mine Remediation Project that will be occurring at the same time and may have an impact on available community resources in Faro and Ross River.	SEMP	11	Acknowledgement added
EMR IR7-21 Provide acknowledgement and include reference to Missing and Murdered Indigenous Women, Girls, and Two-Spirit+ (MMIW2GS+) people and Yukon's MMIWG2S+ strategy as noted in the Final Screening Report.	SEMP	14	Acknowledgement added
EMR IR7-22 Provide a citation for the following sentence: Faro is therefore more likely than any other community to see a population increase because of the Project and, if that increase is significant, may experience more socio-economic effects" (Section 1.3.6). Include the methodology for how a significant increase in population will be measured. Consider a reference to the YESAB Evaluation Report.	SEMP	3.2	Text on impacts has been removed given that it is unknown how many employees will choose to relocate to Faro.
EMR IR7-23 A reference for Ernst and Young (2017) (Section 5.1.1) is missing. Ensure that all references have been provided.	SEMP	7	Added to reference section
EMR IR7-24 Provide background information on the Valued Components and how and where they were developed. Ensure that this introduction is placed in the plan prior to being mentioned in other sections.	SEMP	3.3	Text re-written for clarity
EMR IR7-26 Provide the rationale behind how each plan listed in Table 1-3 relates to the Valued Components described in the SEMP.	SEMP	Table 3-3	Table has been updated to include a more detailed description of the linkages
EMR IR7-27 In Section 2.2, the plan indicates that the Yukon Government is "obligated" to establish a monitoring program to measure project effects against pre-baseline data. Please correct the statement to note that the Yukon Government or a delegate body is to establish the monitoring program.	SEMP	4.2	Updated text to include "delegate"

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Revision 01			
EMR IR7-28 The SEMP references training, apprenticeships, and skill development in Section 5.1.4 (Employability – Education, Training and Experience) but does not provide sufficient detail on these programs or their role in supporting career transition. Additional information is required to provide a list and description of training and apprenticeship programs, including program structure, delivery methods, target participants (e.g., Kaska citizens and Yukon residents), and how these programs support career progression and workforce transition, including during mine closure.	SEMP	6.2	Additional commitments have been added
EMR IR7-29 Please provide more information on the process involved in the scoping exercise and as per Section 3 of the annotated outline, please summarize the reason for each party's expected involvement in engagement (e.g., proximity to site, land claims, land users, etc.).	SEMP	3.5 and Appendix C (Table 1)	Additional context on the scoping exercise has been added and the rationale for the potential involvement of each party is summarized
EMR 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.	SEMP	3.5 and Appendix C (Table 3)	Summary of input received and where it was incorporated into the plan has been added
EMR IR7-31 Consider removing the use of "significant" in this instance.	SEMP	3.5	Removed the term "significant"
EMR IR7-32 BMC has included the Chief's name in Appendix C, but does not consider this single brief response from Ross River Dena Council to constitute successful engagement.	SEMP	3.5 and Appendix C (Table 2)	Updated text and table in appendix for clarity and removed the term "successful engagement"
EMR 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).	SEMP	4.6.2	Text has been updated for clarity
EMR IR7-34 Outline all reporting requirements to the Kaska Nation as part of the Socio-economic Participation Agreement (SEPA), if any (Section 2.6). Provide specifics on how often and/or in what scenarios the SEPA would be updated.	SEMP	4.6.1	Added reporting requirements and annual review requirement

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Revision 01			
EMR IR7-35 Ensure that monetary specifics regarding agreements made with the Kaska Nation in the SEPA are able to be shared publicly. If not, remove these values from Section 5.1.6.	SEMP	8.1	Monetary values have been removed.
EMR 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.	SEMP	3.5.1	Additional text added to clarify BMC will notify MRB in writing if a modernized agreement(s) is executed
EMR IR7-37 Describe how the management framework in the SEPA fits into this SEMP (meetings, reporting, etc).	SEMP	4.6.1	Additional text added to clarify
EMR IR7-38 Provide clarification on the Employee Assistance Program (EAP) (Section 5.1.1) and what BMC is committing to with this program. Specifically, include a paragraph clarifying the scope of who program benefits and how these benefits will be accessible. Include the Insurer's Frequently Asked Questions (FAQ) to address some of this information.	SEMP	14.1, 14.2, and Appendix F	Additional details have been added (i scope of who the program benefits, scope of benefits, how these benefits will be accessible, and additional information requested is provided as Appendix F (i.e. Frequently Asked Questions and scope of benefits)
EMR IR7-40 Expand on how BMC plans to "encourage the participation of local communities, local Indigenous Peoples and associated businesses in its projects wherever practicable" in Section 5.1.3.4.	SEMP	6.1.4	Text has been expended to include examples
EMR IR7-41 Please provide description of on-site medical services described in Section 5.2.1. How many First Aid trained employees there will be proportionally and on shift, how many nurses/onsite Health & Safety people, will they be trained in mental health?	SEMP	14.5.1	Added section to address comment
EMR IR7-42 Include gender-diverse individuals when identifying gender-specific areas of facility use (e.g., camp bathrooms).	SEMP	14.5.4	Added commitment
EMR IR7-43 Please clarify the temporal scope of the statements made in Section 5.2.5.3 (e.g., entire life of the mine, or just the pre-construction phase).	SEMP	14.5.4	Updated to "The following will be developed prior to construction and will be implemented throughout all Project phases"

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Revision 01			
EMR IR7-44 The Public Health and Safety Act and associated regulations should be referenced in this plan. Please contact Environmental Health Services if there are any questions about onsite requirements.	SEMP	14.4	Added reference to the act and regulations.
EMR IR7-45 Include a statement that BMC must submit bacteriological samples to Environmental Health Services on a schedule determined by a Health Officer. The schedule is determined based on water source risk and population served.	SEMP	14.5.3	Added commitment to submit bacteriological samples to Environmental Health Services at a minimum of monthly, or at a schedule determined by a Health Officer.
EMR IR7-46 Include a statement that if the water is deemed not potable at any point BMC must work with Environmental Health Services to determine the cause and rectification of the issue of non-potable water.	SEMP	14.5.3	Added "in the event that the water does meet the drinking water regulations or guidelines, signs will be posted indicating the water is not potable and not to drink the water. BMC will work with Environmental Health Services to determine the cause and develop a solution"
EMR IR7-47 Note that water well construction must be completed as per the Canadian Well Drillers Guidelines and meet the Canadian Drinking Water Guidelines. All water treatment objectives must have Environmental Health Services review and approval.	SEMP	14.5.3	Added "A new water well(s) will be installed and constructed per the Canadian Well Drillers Guidelines and will be required to meet the Canadian Drinking Water Guidelines. All water treatment objectives must have Environmental Health Services review and approval".
EMR IR7-48 Please change the "Department of Social Services" in the table to "Department of Health and Social Services."	SEMP	Table 3-4	Updated to "Department of Health and Social Services"
EMR IR7-49 BMC to work with Yukon Big Game Outfitters to find a convenient time and method to regularly connect and discuss concerns.	SEMP	5.2	Added "BMC will work with Yukon Big Game Outfitters to find a convenient time and method to regularly connect and discuss concerns."
EMR IR7-50 BMC should consider including other tourism stakeholders in the SEMP.	SEMP	3.5	Added Wilderness Tourism Association

LIST OF ACRONYMS AND ABBREVIATIONS

ATV	All-terrain vehicle
BIF	Business Integrity Framework
BMC	BMC Minerals Ltd.
BVP	Best Value Procurement
CAD	Canadian Dollars
EAP	Employee Assistance Program
EMR	Yukon Government Department of Energy, Mines and Resources
FTE	Full Time Equivalent
GED	General Educational Development
Kaska	Kaska First Nations (Ross River Dena Council, Liard First Nation, Daylu Dena Council, Dease River First Nation, Kwadacha First Nation)
KCIPR	Kaska Centric Independent Peer Review
km	Kilometer
KZK	Kudz Ze Kayah
LAWS	Liard Aboriginal Women's Society
LFN	Liard First Nation
LOM	Life of Mine
M	Million
masl	Meter above sea level
OHS	Occupational Health and Safety
QML	Quartz Mining Licence
RCMP	Royal Canadian Mounted Police
RRDC	Ross River Dena Council
SEMP	Socio-economic Management Plan
SEPA	Socio-economic Participation Agreement
t	tonne
TK	Traditional Knowledge
UFA	Umbrella Final Agreement
YESAA	Yukon Environmental and Socio-economic Assessment Act
YESAB	Yukon Environmental and Socio-economic Assessment Board
YFNCC	Yukon First Nation Chamber of Commerce
YG	Yukon Government
YSWC	Yukon Status of Women Council

GLOSSARY

Aboriginal: in Canada, it is a collective legal and constitutional term for the original inhabitants of the land. Under Section 35(2) of the Canadian Constitution Act, 1982, this includes three distinct groups: First Nations, Inuit, and Métis. While “Aboriginal” is the exact term used in the Canadian Constitution, it is increasingly considered an outdated term and is being replaced by “Indigenous”. “Indigenous” is the globally preferred term used to align with international recognition from the United Nations.

Adaptive Management: the process of planning a response to circumstances or events that may not be fully predictable or expected. Adaptive management identifies, in advance, actions that must be taken to gather information and respond appropriately in the event of an unanticipated or unpredictable circumstance.

Baseline: the existing condition of the biophysical system prior to any alteration from human impact.

Closure and Reclamation Phase: project phase that will last at minimum 3 years and occurs following Operations Phase once all mining and ore processing activities stop.

Construction Phase: project phase that will last approximately 2 years and includes site preparation and clearing and establishment of Project infrastructure.

Cumulative Effect: the combined environmental or socio-economic effects that accumulate from a series of similar or related individual actions, contaminants, or projects. The cumulative effects are considered where there is an interaction between Project’s residual effects and the potential residual effects resulting from other past or present projects (where their effects may not be captured under the current conditions), as well as reasonably foreseeable/ known future projects.

Economic Development: the process of improving a community’s economic well-being and quality of life.

Existing Conditions: existing conditions descriptions include considerations of “historic” environmental conditions (through previous studies conducted in the area), Traditional Knowledge, available regional or case studies, and information gathered as part of the project baseline field programs.

First Nations: one of the three recognized Aboriginal/Indigenous groups in Canada, generally refers to Indigenous peoples who are neither Inuit nor Métis.

Gross Domestic Product: broadest quantitative measure of total economic activity. The monetary value of all goods and services produced in an economy over a specified time.

Historic Sites: historic sites contain heritage resources that are greater than 45 years in age and possess significant heritage value. By convention, historic sites date to the period for which written records are available; in this case, the historic period commences with the arrival of the Hudson’s

Bay Company in the early-mid 19th century. Historic sites may include cabins, caches, camps, brush camps, and any other manmade structures, features or objects that date between about 1960 and 1830.

Kaska (i.e., Kaska First Nation): a transboundary Nation involving Kaska people from the Ross River Dena Council and Liard First Nation in southeastern Yukon, and Daylu Dena Council, Dease River First Nation and Kwadacha Nation in northern British Columbia.

Microwave Communications: the transmission of data, voice, or video signals wirelessly using electromagnetic waves in the high-frequency range of 300 MHz to 300 GHz.

MMIWG2S+: Missing and Murdered Indigenous Women, Girls and Two-spirit+ people.

Operations Phase: project phase that will last approximately 10 years and includes open pit and underground development and ore processing.

Potential Effect: an effect identified through potential interaction between Project activity and Valued Component. Potential effects are identified prior to application of addition mitigation measures.

Project Footprint: refers to the area within which the Project infrastructure will be located and is the area of direct disturbance from the Project activities.

Qualified Expert: a term used in the Project's Decision Document terms and conditions and is understood to be defined as an individual who possesses the specified knowledge, skills, training, experience and other requirements to perform a specified type of work but not necessarily related to a legally recognized organization such as a regulatory agency.

Qualified Professional: an individual legally recognized by a regulatory body or government to perform specific, specialized work, provide expert assessments, or certify compliance with technical regulations.

Site: Site refers to the KZK Project inclusive of all operational/construction areas, exploration activities and access road(s).

Traditional Knowledge: as a body of knowledge built up by a group of people through generations of living in close contact with nature. Traditional Knowledge is cumulative and dynamic. It builds upon the historic experiences of a people and adapts to social, economic, environmental, spiritual and political change.

Traditional Land Use: the ancestral and contemporary ways Indigenous peoples occupy, manage, and utilize their traditional territories. It encompasses subsistence, cultural, and spiritual activities passed down through generations, including hunting, fishing, trapping, gathering plants and medicines, and maintaining sacred or historical sites.

Valued Component: element of the environmental and/or socio-economic systems valued for environmental, scientific, social, aesthetic, or cultural reasons.

Yukon Environmental and Socio-economic Assessment Board: an independent arms-length body, responsible for implementation of the assessment responsibilities under the *Yukon Environmental and Socio-economic Assessment Act*.

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Appendix D: Table of Concordance
Appendix E: Labour Requirements During Operations
Appendix F: Employee Assistance Program Information

1 EXECUTIVE SUMMARY

This Socio-economic Management Plan (SEMP) has been prepared by BMC Minerals Ltd. (BMC) for the proposed Kudz Ze Kayah (KZK) Project (the Project). The SEMP focuses on mitigation, monitoring and adaptive management as set out in the annotated outline provided by Yukon Government (YG) Department of Energy, Mines and Resources (EMR) and was developed with inputs from several community organizations.

The structure of the plan includes:

Chapter 2: Provides a summary of the purpose and objectives of the SEMP.

Chapter 3: Describes SEMP development including:

- geographic scope of the plan;
- the valued socio-economic components that are the focus of the monitoring, mitigations and adaptive management;
- other management plans that have mitigations to minimize adverse socio-economic effects;
- community engagement that contributed to the SEMP development;
- key sources of mitigations included in the plan; and
- how the plan is intended to be implemented throughout all stages of the Project (i.e. construction, operations and closure), including ongoing community engagement, stakeholder and Kaska participation. This includes a description of roles and responsibilities and the development of a Socio-economic Working Group for feedback and inputs on SEMP improvements during its implementation.

Chapter 4: Describes the various compliance obligations that form (in part) the mitigations of SEMP.

Chapter 5: Provides a high level summary of the proposed Project phases and a high level summary of the socio-economic context of the Project area.

Chapters 6 through 14: Describes the socio-economic mitigation and enhancement measures that will be implemented throughout the Project phases. Each chapter is focused on a specific socio-economic valued component (categorized per YG's guidance for the development of the SEMP).

Chapter 15: Describes how the socio-economic conditions will be monitored, reported and adaptively managed throughout the life of the Project.

Chapter 16: Presents the references cited in the SEMP.

2 INTRODUCTION, PURPOSE, AND OBJECTIVES

This Socio-economic Management Plan (SEMP) has been prepared by BMC Minerals Ltd. (BMC) to support its application for a Quartz Mining Licence (QML) for the proposed Kudz Ze Kayah (KZK) Project (the Project).

The SEMP focuses on mitigation, monitoring and adaptive management as set out in the annotated outline provided by Yukon Government (YG) Department of Energy, Mines and Resources (EMR) (YG, 2023) and addresses the following key elements:

- Terms and conditions in the Project's Decision Document and BMC commitments made during Project's environmental and socio-economic assessment under the *Yukon Environmental and Socio-economic Assessment Act (YESAA)*.
- Mitigating, monitoring and adaptively managing potential negative socio-economic effects of the Project;
- Supporting, promoting, enhancing, monitoring, and adaptively managing socio-economic benefits of the Project; and
- Providing a basis for annual reporting on socio-economic performance and progress.

This SEMP will form part of BMC's Quartz Mining Licence application, as well as:

- Assuring that the socio-economic commitments made by BMC, and the terms and conditions of the YESAA assessment are integrated into mine plans and operations;
- Meeting community and First Nation expectations of the benefits and performance standards;
- Supporting continuous performance improvement;
- Providing transparency for governments, First Nations and the public about the plans and commitments made by BMC; and
- Supporting other YG agencies such as Health and Social Services, the Women and Gender Equity Directorate and Economic Development.

This SEMP was developed by BMC with assistance from SHE Consulting Inc. of Whitehorse.

3 PLAN DEVELOPMENT AND IMPLEMENTATION

3.1 CORPORATE FRAMEWORK AND POLICIES

BMC operates under a Business Integrity Framework which all company policies are consistent with. The purpose of the Framework is to ensure that BMC meets several important objectives:

- Complying with relevant legislation;
- Conducting business with the level of integrity and ethics that would be expected by business partners, employees, investors, finance providers, regulators, lawmakers and the people and communities impacted by BMC's activities;
- Defining responsibilities of BMC's personnel; and
- Defining a control and reporting framework to ensure compliance is properly monitored and associated risks are managed.

To achieve these objectives, BMC is committed to always upholding the Framework, both in internal matters and decision-making, and in BMC's interaction with external parties. BMC is also committed to developing a culture among its personnel and external parties in which the importance of business integrity is actively promoted. When dealing with external parties, including business partners, government bodies and officials, and people and communities impacted by BMC's activities, it is critical that BMC's personnel ensure that the relevant external parties understand the vital role of business integrity for the company.

BMC has a number of corporate policies that have been adopted for the Project (Appendix A). The current list of policies includes:

- Communications;
- Company Management and Operating Policies and Procedures;
- Digital Media;
- Employee Support;
- Environment;
- Equal Employment, Workplace Harassment and Anti-Discrimination;
- Financial Commercial Management;
- Fitness for Work;
- Indigenous Participation;
- Occupational Health and Safety;
- People;
- Anti-bribery and Corruption;
- Procurement; and

- Epidemic and Pandemic.

Additional policies that are specific to the Project include (Appendix B):

- No Recreational Use of All-Terrain Vehicles and Snowmobiles Policy;
- No Hunting/No Fishing Policy;
- No Firearms Policy;
- No Feeding of Animals Policy; and
- Heritage Policy.

Behind each of these policies is a set of procedures designed to allow the management team to implement each policy and ensure that all employees, contractors, site visitors and, where necessary, suppliers comply with each policy requirement.

Where applicable the policies listed above and included in Appendix A and B have been incorporated the SEMP.

3.2 GEOGRAPHIC SCOPE OF THE PLAN

The local and regional areas applicable to the SEMP are presented in Table 3-1 and are shown in Figure 3-1.

Table 3-1: Geographic Scope of the SEMP

Area	Specific Community
Local Area	Communities of Ross River, Watson Lake, and Faro
Regional Area	Community of Whitehorse

The Project is expected to have Yukon-wide effects. Some of the territory-wide effects include, but are not limited to: economic growth; employment; and territorial tax revenue. There may also be some territory-wide cumulative effects.

The social and economic effects of the Project will be more concentrated in the communities nearest to the mine. Ross River is the closest community to the Project, and by road is 165 km away.

Similar to Ross River, Faro to the Project by road (216 km). Faro has the housing and infrastructure to accommodate a population increase and the Town continues in its efforts to attract new residents (especially families with children).

Watson Lake is somewhat more distant from the Project than Ross River and Faro (260 km). Watson Lake is increasing available housing lots and has the infrastructure to accommodate a population increase and the Town continues in its efforts to attract new residents (especially families with

children). Watson Lake will also serve as the transportation hub for the Project with most export and re-supply traffic coming through the community.

Whitehorse is included separately in this SEMP due to its central role in Yukon's economy and because it will be the point of hire for most of the Project's workers.

First Nations affected by the Project are Ross River Dena Council and Liard First Nation, due to the overlap of the Project location with their Traditional Territory (Figure 3-1).



★ Local Study Area

★ Kudz Ze Kayah Project

★ Regional Study Area

■ Kaska Dena First Nation (Ross River Dena Council and Liard) Traditional Territory

○ Towns and Communities

KUDZ ZE KAYAH PROJECT

FIGURE 3-1

GEOGRAPHIC SCOPE OF THE SEMP

FEBRUARY 2017

National topographic Data Base (NTDB) compiled by Natural Resources Canada at a scale of 1:50,000. Reproduced under license from Her Majesty the Queen, as represented by the Minister of Natural Resources Canada. All rights reserved.
Datum: NAD 83; Projection: UTM Zone 9N



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3.3 VALUED COMPONENT SCOPE OF THE PLAN

Potential Project interactions with socio-economic conditions were extensively studied during the YESAA assessment. The Project is anticipated to interact with socio-economic conditions in a range of key socio-economic areas or Valued Components (VC) (Table 3-2). The VCs were developed by BMC's Yukon based socio-economic consultants during the preparation of the Project Proposal based (in part) on their extensive socio-economic experience and decades of working in the Yukon (BMC, 2017). Consultation during the development of the Project Proposal verified these VCs were appropriate. Throughout the YESAA assessment and the subsequent consultation on the SEMP (Section 3.5), no new VCs were identified. A range of mitigation and management measures for each VC are described in the SEMP and will be implemented to minimize adverse change and to capitalize on potential opportunities or enhancement.

Table 3-2: Summary of Valued Components, Subcomponents, and Potential Effects

Valued Component	Subcomponent	Potential Effect Identified
Economy and Sustainable Livelihood	Economic growth	The Project will provide economic growth to Yukon. The Project will provide economic growth to the communities.
	Diverse and stable economy — discouraging boom and bust	Creation of boom-and-bust cycle through relatively short Project life, particularly in small communities.
	Employment	The Project will provide Kaska citizens and other Yukon residents employment.
	Employability — education, training and experience	The Project has the potential to improve education levels. The Project has the potential to offer training to Kaska and Yukon employees. The Project has the potential to offer work experience to Kaska and Yukon residents.
	Broad participation in economic development	Potential to continue the direct beneficial effect through the Project providing jobs and business opportunities to the entire cross-section of Yukon society.
	Business opportunities	Potential to continue the direct beneficial effect through the Project providing business opportunities to Kaska and Yukon businesses.
	Government revenues	Potential to continue the direct beneficial effect through the Project providing business opportunities to Kaska and Yukon businesses.
Human Health and Well-being	Individual health	The Project has the potential to provide a small beneficial effect by offering steady and well-paid employment, and education and skills development. The combination of a sudden increase in income and shift rotation can have adverse health effects.
	Family stress	The combination of a sudden increase in income and the absence of the employed spouse/parent during each shift rotation can have adverse effects on family health and well-being.
	Reducing alcohol and drug use	Substantial increases in income can lead to increases in drug and alcohol use as these substances become relatively more affordable.

Valued Component	Subcomponent	Potential Effect Identified
	Public health and safety — increased traffic, hazardous material transport	The possibility of a spill or accident that will have a potential public health or safety effect along with an adverse environmental effect.
	Workplace health and safety	Potential adverse effects of workplace accidents. Potential adverse effects to women in the workplace.
Community Vitality	Population — number of children	The Project may attract new residents and their families to the Yukon. Increased population, and especially families with children, is desired in Faro and Watson Lake. Increased population could have a negative effect if the community does not have available housing or lots for development.
	Healthy local business sector — reducing the cost of living	The Project has the potential to improve the health of the local business sector.
	Reducing crime	The Project can potentially reduce crime through employment opportunities. But if increased incomes lead to increases in alcohol and drug use, then crime levels are likely to rise.
	Reducing discrimination and racism	The Project has the potential to reduce discrimination and racism.
	Community events and volunteerism	The Project has the potential to beneficially affect community events through sponsorship.
	Recreational facilities and opportunities	The Project has the potential to beneficially affect recreation facilities and opportunities through donations and sponsorship.
Infrastructure and Services	Housing and land availability	The Project has the potential to affect the oversupply of housing in Faro as it is the closest community and, to a lesser extent, Watson Lake, through the relocation of employees to these communities. Housing in Whitehorse and Ross River may be negatively affected due to the low/no rental market.
	Transportation infrastructure — roads and airports	Potential beneficial effect on the Robert Campbell Highway through highway improvements making it easier for people to travel between the communities of Ross River and Watson Lake.
	Municipal services — water, sewer, solid waste	If significant numbers of employees relocate, small communities' services may be strained. Potential adverse effect if the Project uses municipal solid waste facilities.
	Healthcare services	If significant numbers of employees relocate, health services could be strained.
	Police services	If significant numbers of employees relocate, police services could be strained.
	Child care	Currently, some communities are lacking childcare facilities. An increase in children and childcare needs will necessitate a childcare centre – this could be seen as beneficial for a community that has been waiting for a centre.

Valued Component	Subcomponent	Potential Effect Identified
Culture, Language, Traditional Economy, Traditional Land Use	Traditional economic activities — hunting, fishing, trapping, food gathering	Potentially reduced opportunity to pursue traditional economic activities. Easier access to areas for hunting and fishing; reduced wildlife stocks. Increased traffic and industrial activity in the region may act to drive wildlife away. Disruption and loss of access. Impacts to environment (air, water, soil, vegetation, fish and wildlife) can impede traditional activities due to health concerns
	Gathering traditional medicine	Possible reduction in traditional medicine gathering and use due to rotation shift work and loss of gathering areas.
	Language preservation and restoration	First Nation employees have less time to use and help restore their languages.
	Traditional knowledge and practice preservation and restoration	First Nation employees have less time to practice and restore traditional knowledge.
Heritage	Heritage and historic sites	All Project activities that involve earth moving have the potential to disturb sites or artefacts.

3.4 RELATED MANAGEMENT PLANS

While this SEMP can be reviewed in isolation to inform a review of the specific actions for socio-economic management and monitoring, this SEMP should be viewed in concert with the additional management plans (Table 3-3) to attain a fulsome understanding of mitigation and management measures that affect socio-economic conditions.

The SEMP focuses on those commitments and policies that are not covered by other Project management plans and are relevant to potential Project-related socio-economic effects. When relevant, linkages to other plans are acknowledged.

Table 3-3: Other Relevant Management Plans

Plan	Description	Linkages to SEMP
Waste Management Plan	The management of the miscellaneous domestic and industrial wastes that will be associated with the Project are addressed in the Waste Management Plan. The objective of the Waste Management Plan is to ensure that the handling, storage, transportation, and disposal of all wastes generated by the Project are conducted in such a manner to reduce potential adverse environmental and socio-economic effects associated with waste materials.	The Waste Management Plan contains measures related to: - Mitigating risks to workplace health and safety during the handling and storing of wastes - Mitigating risks to public health & safety during transport of wastes - Mitigating risks to strain on municipal solid waste facilities
Hazardous Materials Management Plan	The Hazardous Materials Management Plan provides a consolidated source of information on the safe and environmentally sound transportation, storage, and handling of the major hazardous materials that will be used during the Construction, Operations, and Closure phases of the Project.	The Hazardous Materials Management Plan contains measures related to: - Mitigating risks to workplace health and safety during the handling and storing of hazardous materials - Mitigating risks to public health & safety during transport of hazardous materials
Environmental Monitoring, Surveillance and Reporting Plan	The Environmental Monitoring, Surveillance and Reporting Plan forms the basis for data collection and analysis, the results of which inform the management of the environmental components of the Project.	The Environmental Monitoring, Surveillance and Reporting Plan contains measures: Related to the monitoring of environmental media (i.e. air, soil, surface water, groundwater, and vegetation) which are related to traditional land use
Adaptive Management Plan	The Adaptive Management Plan identifies adaptive management indicators and thresholds for each environmental component. It provides a decision-making process designed to provide a consistent and pre-planned process to understand and respond to deviations in the Project performance or unforeseen environmental conditions.	The Adaptive Management Plan contains measures related to: Ensuring effectiveness of the Project wide management and mitigations for the protection of environmental media (i.e. air, soil, surface water, groundwater, and vegetation) which are related to related traditional land use
Spill Contingency Plan	The purpose of the Spill Contingency Plan is to inform employees and contractors of the appropriate actions to take when responding to a spill during Project Construction, Operations, and Closure. These actions will minimize the environmental effects and potential health and safety risks associated with accidental spills.	The Spill Contingency Plan contains measures related to: - Mitigating risks to workplace health and safety due to spills - Mitigating risks to public health & safety due to spills during transport - Mitigating risks of impacts to water, soil, vegetation, wildlife, and aquatic life, that in turn mitigate potential effects on traditional land use (i.e. hunting, fishing, trapping, food gathering, water use, medicinal gathering)
Sediment & Erosion Control Plan	The purpose of the Sediment and Erosion Control Plan is to provide site personnel with strategies to manage and minimize erosion and sedimentation on site.	The Sediment and Erosion Control Plan contains measures related to: Mitigating risks of impacts on water quality and aquatic life which in turn mitigate potential risks to impacts on traditional land use (i.e. water use and fishing)

Plan	Description	Linkages to SEMP
Open Pit Mine Development & Operations Plan	The Open Pit Mine Development and Operations Plan describes the mining methods for the Project as well as associated infrastructure and support equipment required to enable mine development and operations.	The Open Pit Mine Development & Operations Plan contains measures related to: Mitigating risks to workplace health and safety and traditional land use as, it includes air quality and noise mitigations
Process Plant Development and Operations Plan	The purpose of the Process Plant Development and Operations Plan is to describe the planned processing facilities and associated ancillary infrastructure of the Project.	The Process Plant and Development Operations Plan contains measures related to: Mitigating risks to workplace health and safety and traditional land use as, it includes air quality and noise mitigations
Tailings Management Plan	The Tailings Management Plan describes the design, construction, and operations of the Class A Storage Facility.	The Process Plant and Development Operations Plan contains measures related to: Mitigating risks to workplace health and safety and traditional land use as, it includes air quality and noise mitigations
Waste Rock and Overburden Management Plan	The Waste Rock and Overburden Management Plan describes the design, construction, and operations of the Class B Storage Facility, Class C Storage Facility, and Overburden Stockpile.	The Process Plant and Development Operations Plan contains measures related to: Mitigating risks to workplace health and safety and traditional land use as, it includes air quality and noise mitigations
Road Construction Plan	The Road Construction Plan describes the site preparation, design, material borrow sources, geochemical evaluation, geotechnical evaluation, and the sediment and erosion control measures for construction of the Service Roads and haul roads for the Project.	The Road Construction Plan contains measures related to: - Mitigating risks of impacts to water from sediment and erosion thus mitigating risks of impacts on water quality and aquatic life and risks to impacts on traditional land use (i.e. water use and fishing) - Mitigating risks to workplace health and safety as it contains road use safety protocols - Mitigating risks to traditional land use as it contains road use safety protocols and wildlife mitigations
Emergency Response and Health and Safety Plan	The Emergency Response and Health and Safety Plan describes incident/emergency classification and response measures in the event of an incident/emergency at Site. The Emergency Response and Health and Safety Plan outlines the protocols that will be followed and the duties of Site personnel.	The Emergency Response and Health and Safety Plan contains measures related to: - Mitigating risk of impacts to workplace health and safety - Mitigating risk of impacts to community health care services through ensuring the site has adequate resources at site to minimize any burden placed on the community resources and facilities
Heritage Resource Protection Plan	The Heritage Resources Protection Plan is intended to provide site management with strategies to protect and manage heritage resources during all phases of the Project.	The Heritage Resources Protection Plan contains measures related to: Protecting and preserving identified heritage sites and collaborating with RRDC and LFN in the development of site specific management of new sites via the chance find procedure which relates traditional knowledge, culture and practice preservation and restoration

Plan	Description	Linkages to SEMP
Water Management Plan	The Water Management Plan presents the water management objectives, strategies and design methodology for Project water management.	The Water Management Plan contains measures related to: Mitigating risks of impacts to water, soil, vegetation, wildlife, and aquatic life, that in turn help mitigate potential effects on traditional land use (i.e. hunting, fishing, trapping, food gathering, water use, medicinal gathering)
Reclamation and Closure Plan	The Reclamation and Closure Plan presents a methodical approach designed to deliver sound, appropriate, and responsible closure of the Project that meets predetermined goals and objectives. The Project closure goal is grounded in responsible stewardship, consultation with stakeholders and appropriate end land use considerations: To return the Project site and affected areas to viable and, wherever practicable, self-sustaining ecosystems that are compatible with a healthy environment and with Traditional Land Use activities.	The Reclamation and Closure Plan contains measures related to: Commitments for future engagement in reclamation planning and refinement of post mining land use objectives, that in turn relate to traditional land use
Traffic Management Plan	The Traffic Management Plan describes the primary access routes that will be used for all phases of the Project including, where applicable, discussion of controls on that access, projected traffic volumes, traffic management processes, safety procedures, response processes, and communications. The objective of the Traffic Management Plan is to ensure BMC's Road management practices deliver worker and public safety, maintain environmental integrity, minimize wildlife impacts, meet or exceed regulatory requirements.	The Traffic Management Plan contains measures related to: - Mitigating risks to workplace health and safety and community safety as it contains road use safety protocols, public communications program and a working group - Mitigating risks to wildlife impacts and access impacts which in turn are related to traditional land use
Wildlife Protection Plan	The Wildlife Protection Plan outline BMC's commitments to employ management strategies to minimize negative effects to wildlife and their habitat, presents the wildlife monitoring and adaptive management programs.	The Wildlife Management Plan contains measures related to: Mitigations relating to minimizing impacts wildlife that are part of the traditional economy, culture and land use

3.5 ENGAGEMENT

Engagement in the development of the SEMP occurred between November 2023 and April 2024. The purpose of the engagement was to ensure local needs and interests were considered and where appropriate incorporated into the SEMP. A summary of the engagement process is presented in Figure 3-2.

In September 2023 BMC and its consultant (SHE Consulting Inc.) conducted a scoping exercise to identify governments (including First Nations), stakeholders and interested parties (collectively termed Organizations for the purpose of this document) that could or were known to have an interest in providing input into the SEMP. The scoping exercise included the consideration of First Nation's Traditional Territory overlap with the Project, towns' proximity to the Project, organizations' proximity to the Project (i.e. land users), and organizations in the Yukon with specific interests related to the VCs listed in Section 3.3. In total, 36 Organizations were identified and are presented in alphabetical order in Table 3-4. Rationale for their potential involvement is include in Appendix C (Table 1).

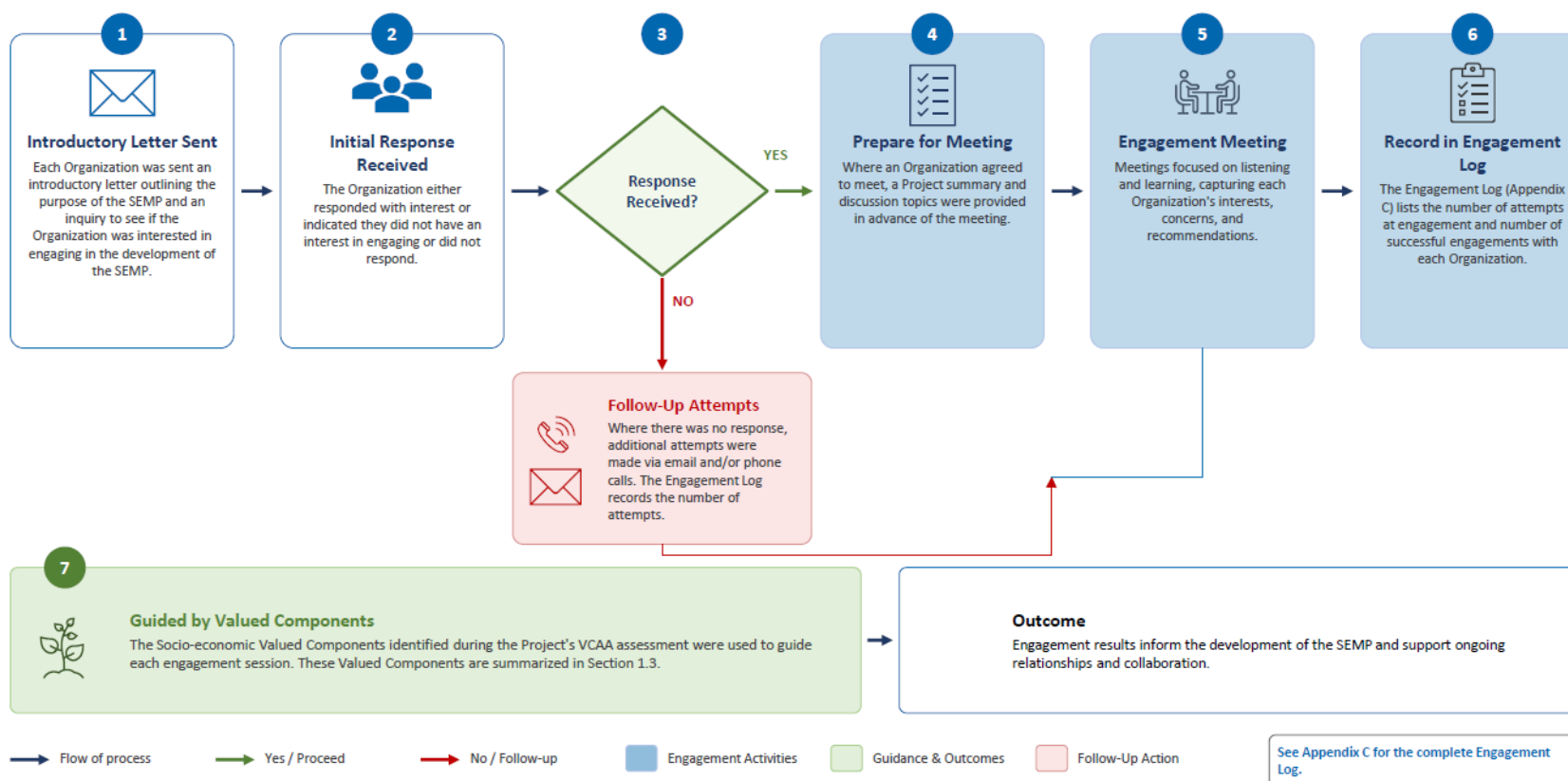
Table 3-4: Organizations Identified as Having a Potential Interest in Engaging on SEMP Development

Organization			
Association of Yukon Communities	Yukon Government Department of Health and Social Services	Ross River Margaret Thompson Centre	Yukon Anti-Poverty Coalition
BYTE – Empowering Youth Society	First Kaska GP Ltd	Selkirk Development Corporation (introduction by YFNCC)	Yukon Big Game Outfitters
Canadian Mental Health Association	House of Wolf & Associates	Tourism Industry Association of Yukon	Yukon Chamber of Commerce
Carmacks Development Corp (introduction by YFNCC)	Help & Hope for Family Society	Town of Faro	Yukon First Nation Chamber of Commerce (YFNCC)
City of Whitehorse	Liard Aboriginal Women's Society (LAWS)	Town of Watson Lake	Yukon First Nations Cultural & Tourism Association
Council of Yukon First Nations	Liard First Nation	Watson Lake First Nation Health	Yukon Heritage Branch
Daylu Dena Council	Queer Yukon Society	Watson Lake Food Bank & Soup Kitchen	Yukon Status of Women's Council
Dana Naye Ventures	Ross River Dena Council	Whitehorse Aboriginal Women's Circle	Yukon Women in Mining
Dena Nezziddi Development Corporation	Ross River Hope Centre	Yukon Aboriginal Women's Council	Yukon Women Gender Equity Directorate

Each Organization was sent an introductory letter outlining the purpose of the SEMP and an inquiry to see if the Organization was interested in engaging in the development of the SEMP. In some instances, the Organization either didn't respond or responded that they did not have an interest in engaging. Where there was no response, additional attempts were made via email and/or phone calls. The Engagement Log is included in Appendix C (Table 2). The Engagement Log lists the number of attempts at engagements; number of engagements; and identification of the Organizations that

ultimately participated in the development of the SEMP. Where an Organization agreed to meet, a Project summary and discussion topics were provided in advance of the meeting. The meetings focused on listening and documenting each Organization's interests, concerns, and recommendations. The socio-economic VCs identified during the Project's YESAA assessment were used to guide each meeting. These VCs were summarized in Section 3.3.

Figure 3-2: Summary of Engagement Process



3.5.1 First Nation Engagement

During the development of this SEMP, BMC ensured that LFN and RRDC governments and citizens had opportunities to participate in and influence its development through email correspondence, face to face, and community meeting opportunities. Email correspondence was received from RRDC which requested clarification on the “purpose of the engagement”; however, no response was received following the explanation provided to RRDC on the purpose. LFN responded that it was too early to engage on the SEMP due to a lack of funding and expressed their view that engagement was a Crown duty and not the responsibility of BMC.

BMC has sent several letters to RRDC and LFN Chief and Council offering funding to participate in the Project permitting processes (including the development of the SEMP).

Some individual Kaska citizens were willing to speak with BMC about some of the benefits and challenges of BMC moving forward with the Project.

Although RRDC and LFN chose not to directly participate in the development of the SEMP, RRDC and LFN (in particular) provided numerous submissions during the Project’s YESAA assessment regarding (in part) their concerns about potential adverse socio-economic effects of the Project. Many of these concerns were re-iterated in both LFN’s and Liard Aboriginal Women’s Society’s (LAWS) Interventions on BMC’s Type A Water Licence Application. Mitigations and monitoring to address the concerns raised to date have collectively been incorporated into this SEMP.

In 2021, LAWS issued a report entitled “Never Until Now”. The preface of the report stated that the women’s stories presented in the report “*will help us to work with Industry and governments in forming policies to change the environment*”. BMC reviewed the report in detail and tabulated the recommendations and mitigations from the report and where applicable have incorporated these into this SEMP. BMC made several attempts to engage directly with LAWS to more fully understand the recommendations in “Never Until Now” however, these attempts were not successful.

As the Project continues to proceed through the permitting process, BMC will continue to provide opportunities for Kaska involvement in all aspects of the Project including but not limited to the implementation of SEMP and any future revisions to it.

3.5.2 Community Engagement

Fifteen of the Organizations that were contacted agreed to participate in the development of the SEMP (Appendix C – Table 2). Comments and recommendations from each Organization were documented, reviewed and where applicable incorporated into the SEMP. Once the SEMP was drafted, BMC sent follow-up letters to the Organizations that participated, which (in part) included tables of their suggestions, BMC’s responses and where in the SEMP their recommendations were added and/or addressed. BMC committed to further follow-up once the SEMP had been reviewed and approved by YG. BMC also committed to not share their specific comments. Subsequently YG requested a summary of the input received from each Organization (engagement summaries) and how it was incorporated into the plan. In order to address YG’s request and respect the Organizations

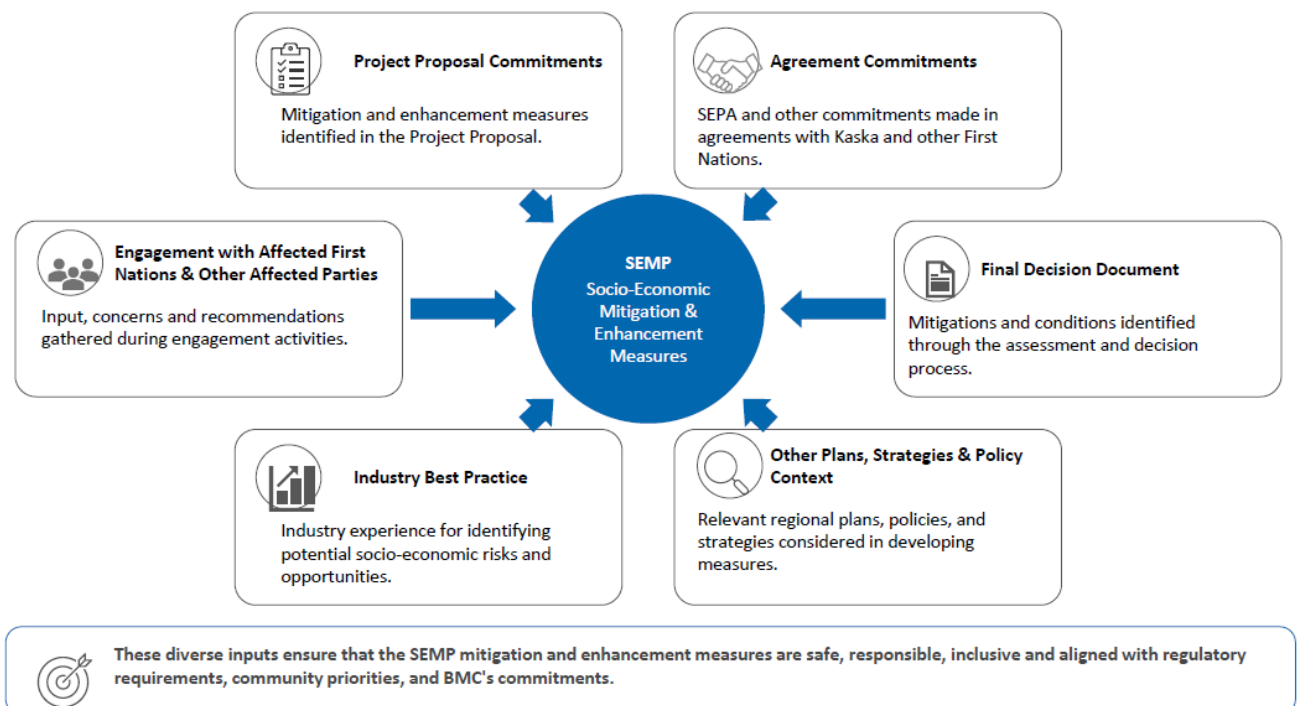
confidentiality, the summaries have been prepared by grouping comments by Organizations with similar interests and/or mandates (Appendix C – Table 3).

3.6 SOCIO-ECONOMIC MITIGATION AND MANAGEMENT

The socio-economic mitigation and enhancement measures presented in the SEMP were developed based on multiple sources (Figure 3-3) to ensure they are comprehensive, evidence informed and responsive to stakeholder and First Nations input and included (but not limited to):

- Those identified in the Project Proposal;
- Commitments made by BMC in response to Information Requests during the Environmental and Socio-economic Assessment process;
- Commitments made in response to public and First Nations comments during the Environmental and Socio-economic Assessment process;
- Mitigations listed in the YESAB Screening Report;
- Conditions required in the Decision Document;
- Commitments made to RRDC Elders as part of their Conditions for Consent;
- Mitigations identified from LAWS document entitled “Never Until Now”;
- Mitigations identified during the engagement conducted to develop this SEMP; and
- Mitigations listed as being required in YG’s guidance for this SEMP.

Figure 3-3: Inputs Informing Socio-economic Mitigation and Enhancement Measures



3.7 PLAN IMPLEMENTATION

The parameters for implementing the SEMP will be determined and/or confirmed through engagement with First Nations, Organizations and Communities. The following subsections provide preliminary details and strategies related to how the SEMP will be implemented and further developed.

3.7.1 Engagement

The level of engagement on the SEMP and format of engagement will vary and depend on the specific interests of First Nations, Organizations and Communities. Previous engagement on the Project has included:

- Meetings (via teams, phone or in person);
- Written reviews and responses on Project information;
- Workshops;
- Community Meetings;
- Discussions at BMC's offices in Whitehorse, Watson Lake and Ross River;
- Quarterly newsletters; and
- Company website.

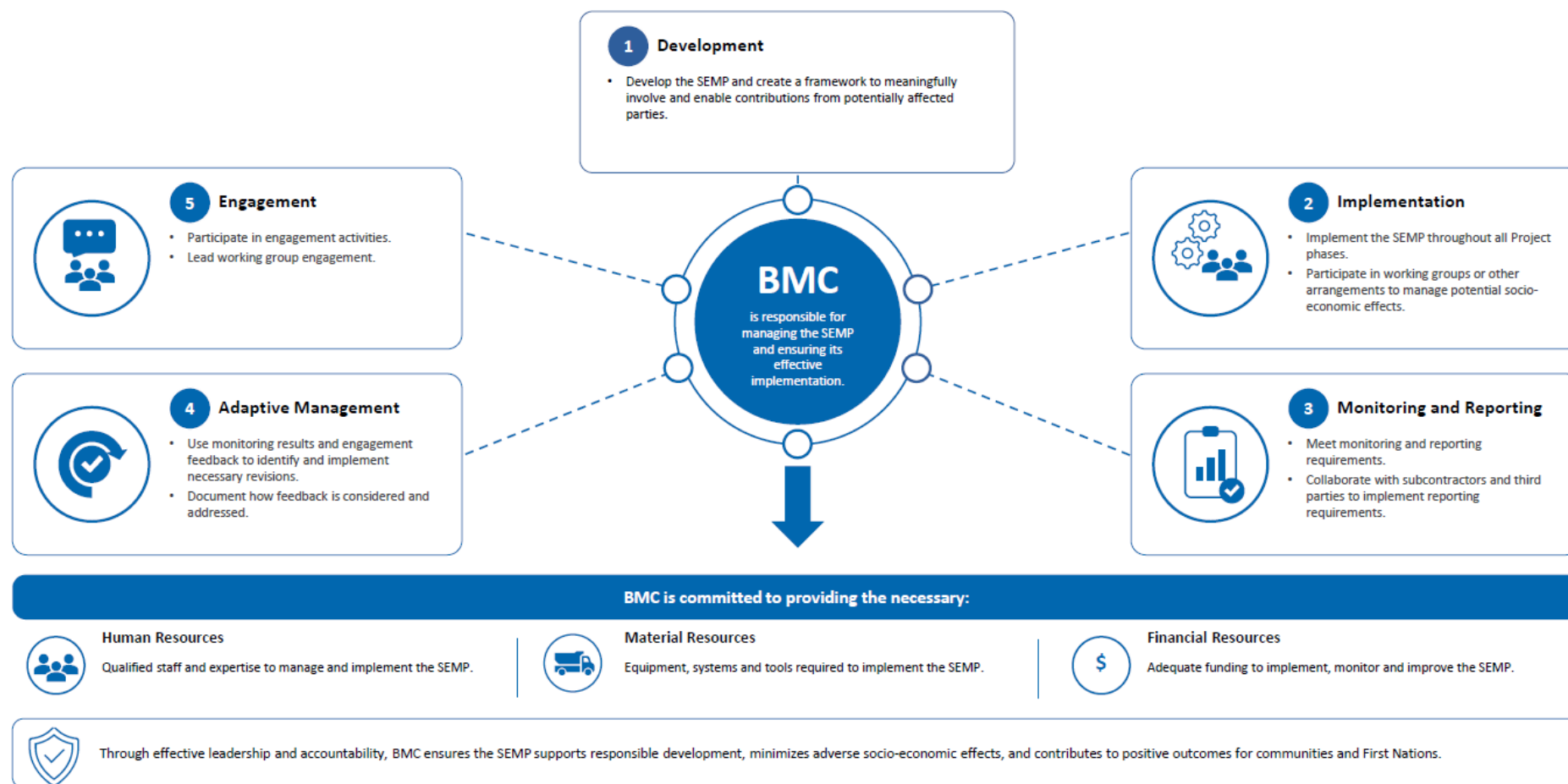
Engagement throughout the implementation of the SEMP will continue to include information sharing via the above means, and other avenues can be accommodated as requested by the First Nations, Organizations and Communities. As an example, recently RRDC's Lands Office requested that BMC update its file sharing site with RRDC to include all updated Project information (including all permit application documentation).

3.7.2 Roles and Responsibilities

BMC's Role and Responsibility

BMC is committed to providing the necessary human, material, and financial resources to implement and maintain the SEMP. BMC is responsible for managing the SEMP and ensuring that its elements are implemented. BMC's Roles and Responsibilities are presented in Figure 3-4.

Figure 3-4: BMC's Roles and Responsibilities



Potentially Affected First Nations Roles and Responsibility

BMC will continue attempts to engage with RRDC and LFN in the development and implementation of the SEMP per BMC's custom and practise and per the conditions of the Decision Document. If RRDC and LFN choose to participate, this section of the SEMP will be updated with a summary of any formal agreements, nature of their participation, including any identified roles and responsibilities. The monitoring proposed for Traditional Land Use and Culture will be heavily reliant on information provided by RRDC and LFN, and the success of this aspect of the SEMP will rely on their participation.

Potentially Affected Organizations and Communities Roles and Responsibilities

Participation and responsibilities of Organizations and Communities will be determined through ongoing engagement with the respective parties.

A preliminary list of roles and responsibilities is presented in Table 3-5.

Table 3-5: Preliminary Roles and Responsibilities

Involved Pary	Description	Roles and Responsibilities
BMC	- Environment & Permitting Team - Human Resources Team - Community Liaisons/Mentors - Experts, Advisors & Relevant Consultants employed by BMC	- Engage with affected communities, First Nations and stakeholders - Develop SEMP and implementation throughout all Project phases - Monitor and report on socio-economic effects - Implement adaptive management if required
First Nations	- Ross River Dena Council - Liard First Nation	- Participate in engagement process to develop content for SEMP - Providing monitoring data (where formally agreed) - Review monitoring results and provide feedback, suggestions and recommendations during all phases of the Project - Support with identifying unforeseen socio-economic effects of the Project
Organizations	- Territorial government departments - Service Providers - Municipal governments - Non-governmental Organizations	- Participate in engagement process to develop content for SEMP - Providing monitoring data (where formally agreed) - Review monitoring results and provide feedback, suggestions and recommendations during all phases of the Project - Support with identifying unforeseen socio-economic effects of the Project
Communities	Residents of: - Faro - Ross River - Watson Lake - Whitehorse	- Review monitoring results and provide feedback, suggestions and recommendations during all phases of the Project from Construction to Closure, if they choose to participate - Support identification of unforeseen socio-economic Project effects

3.7.3 SEMP Working Group

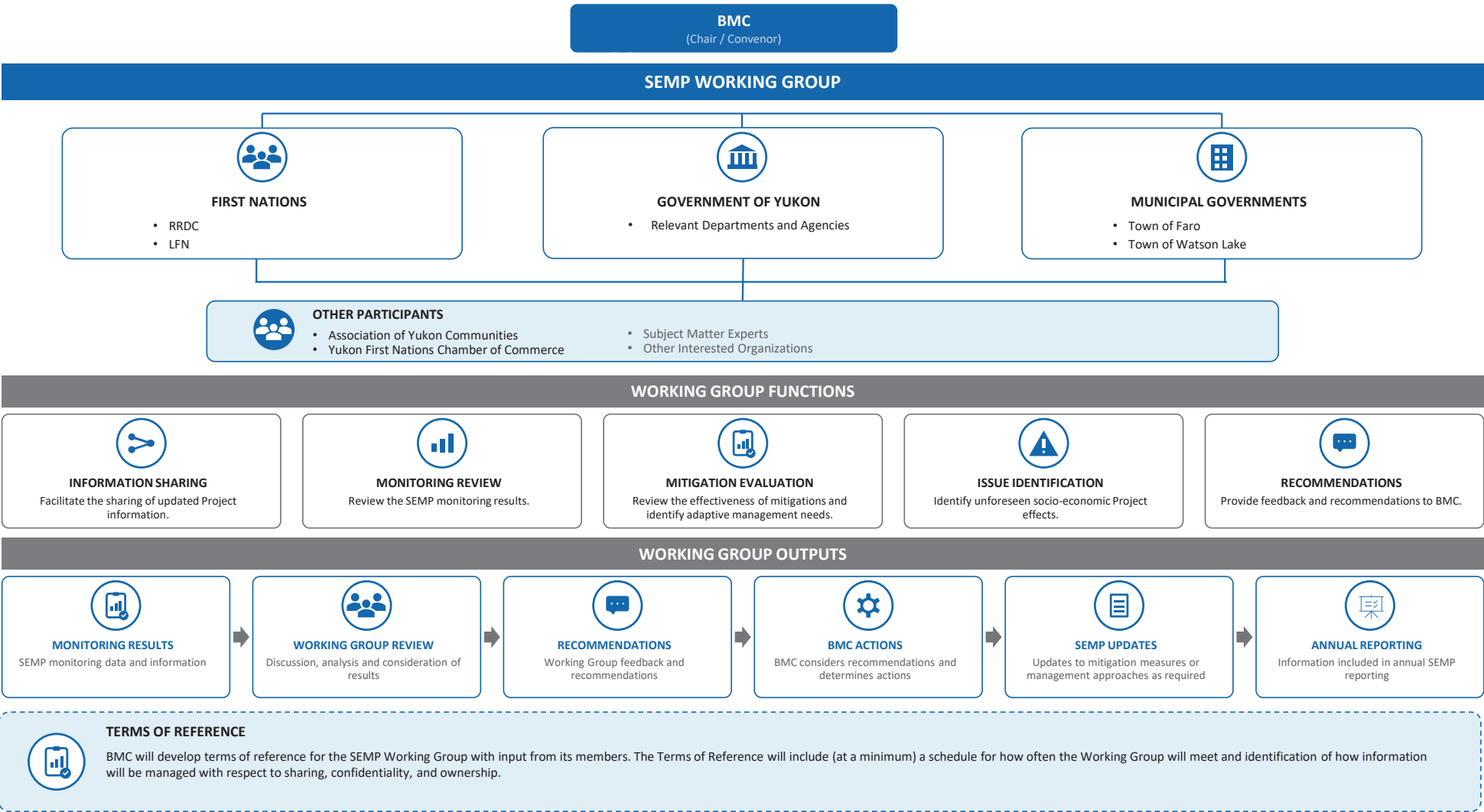
BMC will initiate and lead the SEMP Working Group. The preliminary objectives of the Working Group will be to:

- Facilitate the sharing of updated Project information;
- Review the SEMP monitoring results, and provide feedback and recommendations based on the results;
- Review the effectiveness of mitigations and identify and implement the adaptive management process when required; and
- Identify unforeseen socio-economic Project effects.

The composition of the SEMP Working Group will be defined prior to the Construction phase of the Project. Each of the Organizations that provided input into the development of the SEMP will be contacted to see if they have an interest in participating (RRDC and LFN will also continue to be contacted). BMC currently anticipates that the Working Group will include representatives from BMC, the Government of Yukon, RRDC, LFN, Association of Yukon Communities, Town of Watson Lake, Town of Faro, Yukon First Nations Chamber of Commerce and other relevant parties with specific knowledge and/or understanding of Project effects on the socio-economic conditions identified for monitoring. BMC will develop terms of reference to guide the operation of the SEMP Working Group with input from its members. This will include (at a minimum) a schedule for how often the Working Group will meet and identification of how information will be managed with respect to sharing, confidentiality, and ownership.

The SEMP Working Group Governance Structure is presented in Figure 3-5.

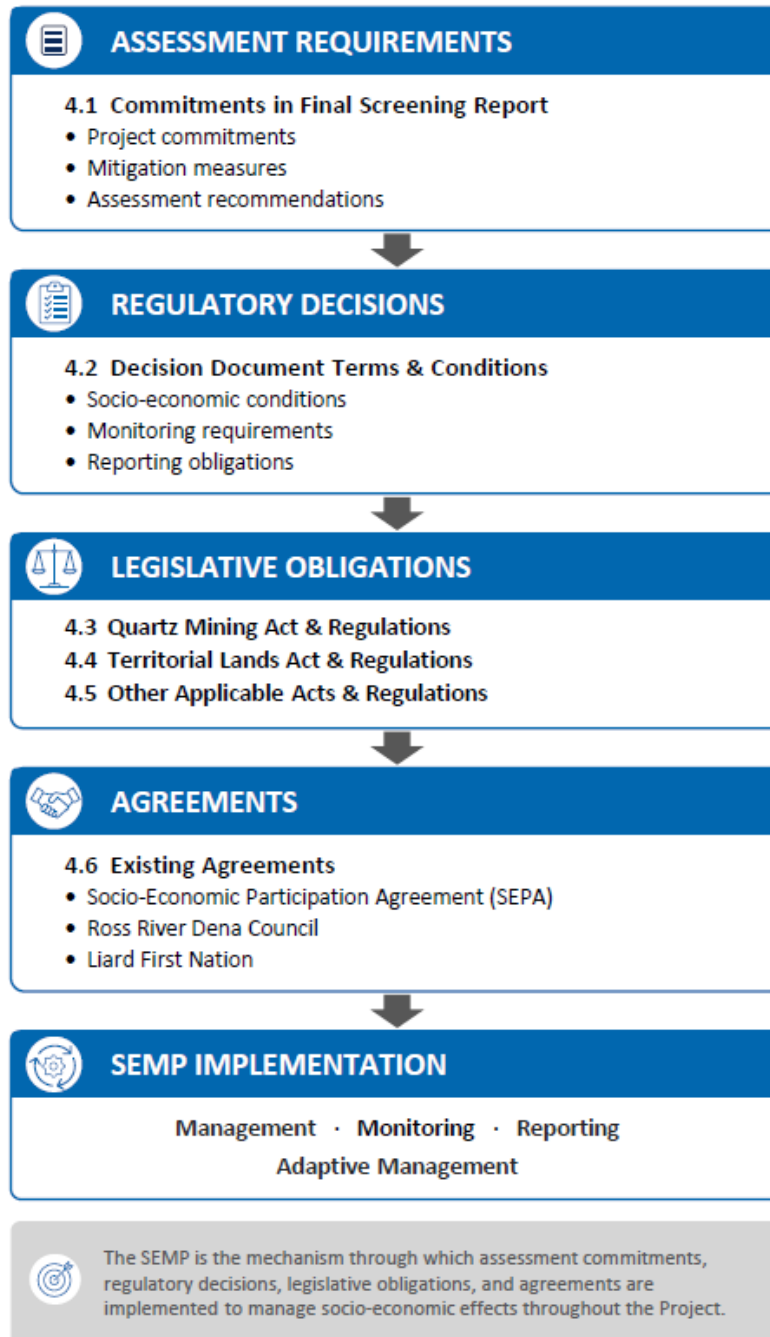
Figure 3-5: SEMP Working Group Governance Structure



4 COMPLIANCE OBLIGATIONS

The following sections present the regulatory requirements and obligations that are most applicable to the SEMP. A summary of the Compliance Framework Governing the SEMP is presented in Figure 4-1.

Figure 4-1: Compliance Framework Governing the SEMP



4.1 COMMITMENTS IN FINAL SCREENING REPORT

On October 21, 2020, the Executive Committee of the Yukon Environmental and Socio-economic Assessment Board (YESAB) concluded its assessment of the Project pursuant to the *Yukon Environmental and Socio-economic Assessment Act* (YESAA). As a result of the assessment, the Executive Committee recommended to the Decision Bodies that the Project be allowed to proceed without a review, subject to the terms and conditions identified in the Screening Report and Recommendation (Project Assessment #2017-0083).

Appendix D of this SEMP presents commitments made by BMC as part of the Project Proposal and subsequent Information Requests related to the Socio-economic VCs and shows where in this SEMP each of the commitments are addressed.

4.2 DECISION DOCUMENT TERMS AND CONDITIONS

In April 2026, Yukon Government (YG), Fisheries and Oceans Canada and Natural Resources Canada, in their capacity as Decision Bodies and pursuant to s.78 of YESAA issued a consolidated Decision Document for the Project. The Table of Concordance (Appendix D) identifies where in this SEMP each of the socio-economic terms and conditions of the Decision Document are addressed.

The Decision Document terms 12 through 18, 21 through 30 as well as 43, 46, and 49 are primarily socio-economic conditions, specifically targeted at mitigating socio-economic impacts associated with the Project. The Decision Document obligates BMC to ensure that these terms are fulfilled. Many of the conditions are already company policy and processes, included in the proposed modernized SEPA, or are employment benefits that will reside in employment contracts when the Project obtains permits, financing, and a final investment decision to proceed with the Project is made.

In addition, Monitoring Condition F obligates YG or a delegate body to establish a monitoring program, after consulting with LFN, RRDC, LAWS, and Yukon Status of Women Council (YSWC) to measure potential Project effects against pre-Project baseline data. This program will determine the extent to which the Project's effects are associated with violence against women (with special consideration for First Nation women) and gender and sexual minorities in Ross River, Watson Lake, and Whitehorse.

BMC expects that YG will share the results of this monitoring program so BMC can consider adjustments in processes, programs, policies and management plans (including the SEMP) as may be required based on results of the monitoring program.

4.3 QUARTZ MINING ACT AND REGULATIONS

BMC currently holds a Class III Mining Land Use Authorization for the KZK Exploration Project. Many of the terms and conditions in the Class III relate to mitigating environmental impacts and are indirectly related to managing impacts to traditional land users (which is one of the Socio-economic VCs considered in this SEMP).

BMC has also applied for a QML for the proposed mine Project. As described in Section 3.4, there are several management plans that will form the QML and that have direct linkage to this SEMP.

4.4 TERRITORIAL LANDS ACT AND TERRITORIAL LANDS REGULATIONS

The Tote Road Lease (the Lease) for the Project (105G07-001) was issued under the *Yukon Lands Act* RSY 2002, c.132. The Lease contains extensive mitigations for the safe operation of the Project's Tote Road and extensive mitigations to minimize impacts to wildlife. All mitigations related to safety and wildlife that are contained in the Tote Road Lease have been incorporated into the Project's Traffic Management Plan and Wildlife Protection Plan.

4.5 OTHER ACTS AND REGULATIONS

BMC engaged SHE Consulting Inc. a professional Workplace Health and Safety firm to ensure that matters of community and worker health and safety are considered for the Project (including this SEMP) and that compliance with minimum requirements in this regard is achieved including but not limited to the *Yukon Occupational Health and Safety Act* (YG, 2002a) and Yukon Workplace Health and Safety Regulations (YG, 2022).

4.6 EXISTING AGREEMENTS

4.6.1 Socio-Economic Participation Agreement

The SEPA is the foundational agreement document between Kaska and BMC. It describes how the parties will work together to advance the Project, manage the SEPA, and ensure benefits from the Project flow to Kaska citizens and entities.

In 1985, the Ross River Development Corporation, acting on behalf of RRDC, signed a SEPA with Cominco. The agreement outlined a collaborative approach to potential mine development between the parties and established commitments on the part of Cominco around employment, training, contracting and direct payments for land use interruption. In 2004 this document was amended by Teck Cominco and RRDC with additional language around joint venture opportunities and additional detail added regarding contracting and employment. The revised SEPA was signed by RRDC on behalf of all Kaska First Nations and was ratified by each individual First Nation including a community vote by RRDC citizens.

Annual reporting requirements within the SEPA, include:

- i. number of Kaska employees hired;
- ii. wages paid;
- iii. any training component which has given lasting skill enhancement;
- iv. community developments – which enabled Kaska or Kaska business to enhance the capability to deliver goods or services;

- v. general community benefit – any contract which in general terms aided the community;
- vi. any financial benefits to the Kaska or Kaska Minerals; and,
- vii. quality and reliability of services provided.

In addition to the annual reporting requirement the company is required to provide environmental reports, heritage reports and archaeology reports to Kaska.

The existing SEPA between BMC and Kaska provides an opportunity for Kaska to participate in the Project through the formation of a Management Advisory Committee. This Management Advisory Committee is to be co-chaired by the Company and Kaska and is the body responsible for implementing the SEPA and primary forum for resolving areas of mutual concern. Kaska members of the committee are responsible for informing Kaska citizens of the benefits and opportunities within the SEPA.

The implementation and functioning of the SEPA are to be reviewed annually by the company and Kaska and any recommendations for changes are to be mutually agreed upon in writing by both parties.

A condition of BMC's purchase of the Project from Teck in 2015 was that it would assume the responsibilities associated with the 2004 SEPA and meet its commitments within. After discussions with RRDC as the lead Kaska community for the Project, the parties signed a letter of intent in 2019 to embark on a modernization process for the SEPA. In early 2021, BMC provided a comprehensive modernized SEPA proposal with Kaska leadership. The proposed modernized SEPA further defines the Management Advisory Committee and establishes an Environmental Management Committee, and Culture and Heritage Management Committee to further ensure Kaska participation in the overall management of the Project. The proposed modernized SEPA contains detailed descriptions of the formation of the committees, membership, mandates, processes, meetings, document reviews etc. with the main objective of ensuring environmental management and cultural heritage management are governed by both BMC and Kaska. However, beyond executing the letter of intent Kaska have not engaged in updating the current SEPA, though BMC remains prepared to start those discussions as soon as they are ready to begin. Until a modernized SEPA is agreed to by the parties, the 2004 SEPA remains in place.

Non-confidential information gained through the implementation of the SEPA (i.e. through meetings, reporting etc.) may help inform the monitoring, reporting, mitigation, and adaptive management strategies that are presented in the SEMP and may result in updates to the SEMP as described in Section 3.7.

Term # 46 of the Decision Document requires BMC to make reasonable efforts, satisfactory to the Decision Bodies to either enter into a new SEPA or amend any existing SEPA with: a. the Ross River Dena Council; and b. the Liard First Nation. BMC's efforts will be recorded and non-confidential information will be provided to the Decision Bodies and if/when a new or modernized SEPA is executed between the parties, BMC will notify (in writing) both the Decision Bodies and YG, and the SEMP will be amended (if necessary).

4.6.2 Ross River Dena Council

BMC and RRDC are both signatories to an agreed Traditional Knowledge (TK) protocol. The overarching principal of the TK protocol is for RRDC to propose mitigation measures informed by TK to enable the BMC to avoid, mitigate, manage or otherwise address potential effects of the Project on Kaska Title and Rights, Ecological Sites, Cultural Sites, values and features of significance to RRDC. Any proposed mitigations are to be reviewed by the BMC and if any are reasonably be deemed to be unfeasible BMC is to provide rationale to RRDC and discuss alternative measures to address the concerns.

Through the TK protocol, a study of the Project area was conducted by RRDC which was largely driven by RRDC Elders. The deliverable anticipated under this protocol eventually became the Elders Conditions of Consent which were presented to BMC by RRDC. In 2018, BMC agreed to 17 of the 24 conditions in their entirety. One condition was partially agreed to with another receiving conditional agreement pending further detail being provided by RRDC. Two conditions were internal to RRDC and it was not BMC's place to agree or disagree. BMC did not agree to the remaining three conditions, provided rationale to RRDC for the disagreement, and made additional changes in plans to mitigate the potential impacts of concern to the Elders. In the case of potential for seasonal road closures (which was one of the Elders conditions), this has been addressed as Condition #42 of the Decision Document effectively taking the decision regarding acceptance out of BMC's hands.

If new effects and/or mitigations are identified by RRDC through any ongoing TK work then, 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 Project is located in the far southeast corner of RRDC group registered trapline concession #405; however, the Project mineral claims also extend into registered trapline concession #250 which is held by two RRDC citizens. The existing Socio-Economic Participation Agreement provides for compensation for land use disruption over trapline #405 and BMC has been completing its obligations under the existing Socio-Economic Participation Agreement. In addition, a separate land use disruption agreement has been made with the holders of registered trapline concession #250.

During the assessment phase of the Project, RRDC expressed a desire to have their own environmental consulting firm, Dena Cho Environmental, conduct an independent review of BMC's Project Proposal and subsequent draft management plans that support the Project's permit applications. BMC agreed and contracted directly with Dena Cho to have this work completed. Dena Cho reported directly to RRDC with BMC providing funding and data as requested.

4.6.3 Liard First Nation

BMC signed a Kaska Centric Independent Peer Review (KCIPR) agreement with LFN in June 2019 to provide a mechanism for BMC to fund LFN activities, ranging from Project management plan review to collection and sharing of non-confidential TK and Traditional Land Use information. LFN used the funding to engage consultants and community members and throughout the YESAA process submitted extensive KCIPR generated documentation to YESAB. In January 2024, BMC paid the final financial installment for the KCIPR to LFN and the agreement was deemed complete by both parties.

5 MINE DESCRIPTION AND SOCIO-ECONOMIC OVERVIEW

5.1 PROJECT SUMMARY

The Project is located on the northern flank of the Pelly Mountain Range (Figure 5-1). The Project area lies approximately 24 km south of Finlayson Lake, in the upper portion of the Geona Creek valley. The Project area is located at approximately 1,400 metres above sea level (masl) elevation in a broad, gently sloping valley.

The Project encompasses the ABM Deposit, comprising two mineralized zones, the ABM Zone and the Krakatoa Zone. The ABM Deposit is a polymetallic volcanogenic massive sulphide deposit containing economic concentrations of zinc, copper, lead, silver, and gold. Mining of the ABM Deposit will be conducted via both open pit and underground mining methods, with ore processed into separate copper, High Precious Metals (silver, gold and lead), and zinc concentrates via sequential flotation through a nominal 2 million tonnes per annum processing plant. Dry stack (filtered) tailings will be co-disposed with potentially acid-generating waste rock in the Class A Storage Facility on the western slope of the Geona Creek Valley. Other waste rock will be stored in separate managed storage facilities according to its assessed acid generation and metal leaching potential. Some waste rock may be stored in mined out areas of the open pit and underground workings.

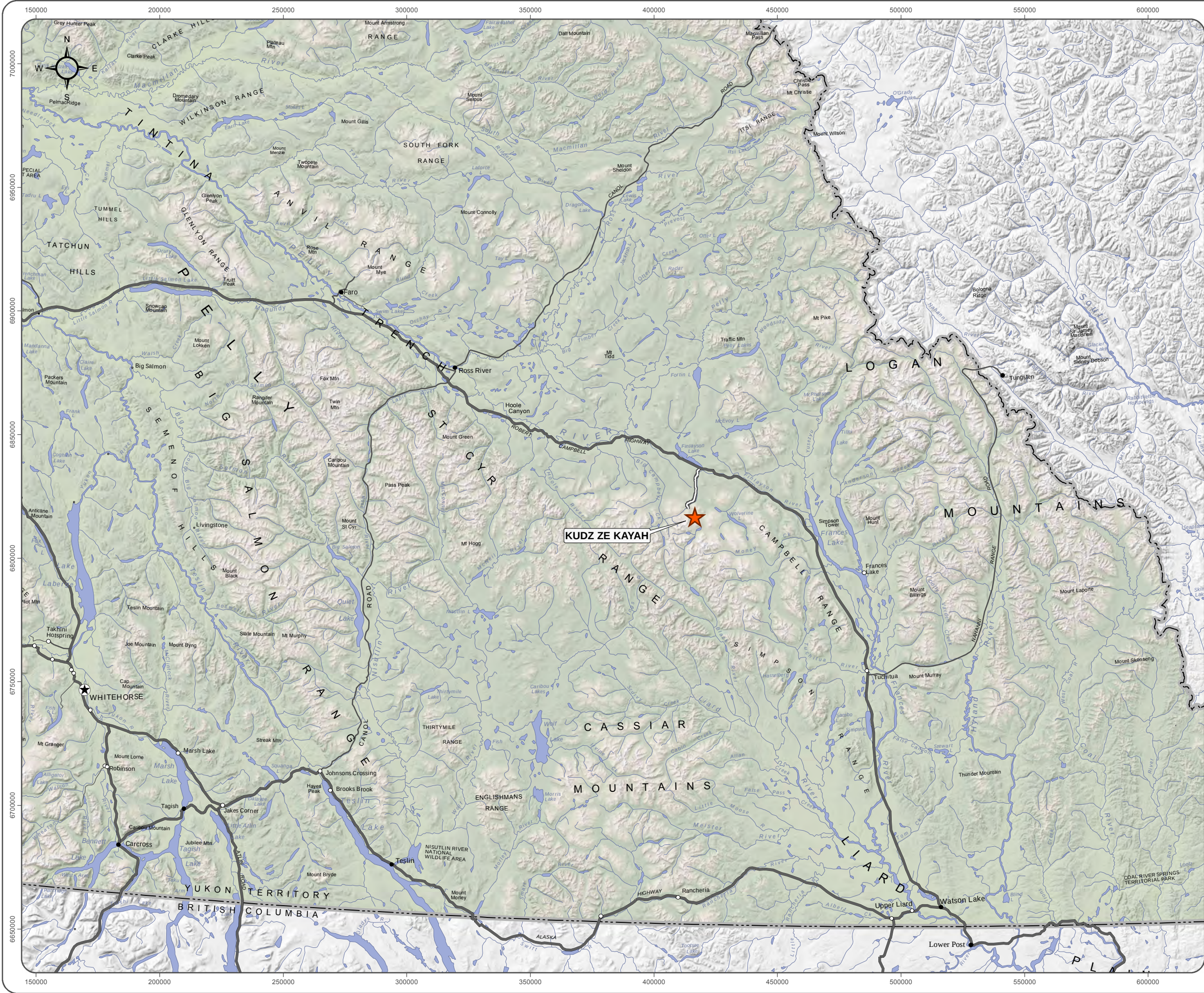
Site infrastructure includes an overburden stockpile area, two waste rock storage facilities (Class B and C Storage Facilities), a combined tailings and rock storage facility (Class A Storage Facility), water collection and storage facilities, ore processing plant, water treatment plant, power plant, camp, laydown area, maintenance shops, and administration offices (Figure 5-2).

The Project phases include Construction, Operations, and Closure (including Active Closure, Transition Closure, and Post-Closure). A summary of the anticipated duration of each phase is included in Table 5-1. The site configuration at the end of Transition Closure and Post-Closure is shown in Figure 5-3 and Figure 5-4 respectively.

Table 5-1: Project Phases and Schedule

Project Phase	Project Year	Approximate Duration
Construction	Year -2 to Year 1	2 years
Operations	Year 1 to Year 10	10 Years
Active Closure	Year 11 to year 13	3 Years
Transition Closure	Year 14 to Year 26	13 Years
Post-Closure	Year 27 to Year 36	10 Years

Mining of the current Mineral Reserve will include approximately ten years of Operations. Concentrates will primarily be transported via Highway 4 (Robert Campbell Highway) south to Watson Lake and Highway 37 south to the Port of Stewart, British Columbia (a distance of 911 km) for transport to international markets. Some concentrates may be sold within the North American market, which would be hauled to a rail siding at Fort Nelson for subsequent rail haulage to market.



KUDZ ZE KAYAH PROJECT

FIGURE 5-1
PROJECT LOCATION

OCTOBER 2016



 KUDZ ZE KAYAH PROJECT



Digital elevation model created by the Yukon Department of the Environment interpolated from the digital 1:50,000 Canadian National Topographic Database (NTDB Edition 2) contour and watercourse layers. Obtained from Geomatics Yukon.
Canvec compiled by Natural Resources Canada at a scale of 1:10,000 - 1:50,000. Reproduced under license from Her Majesty the Queen in Right of Canada, as represented by the Minister of Natural Resources Canada. All rights reserved.
Drainage areas obtained from National Hydrology Network 2011
Datum: NAD 83; Projection UTM Zone 9N
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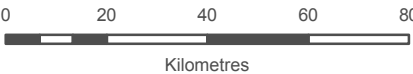
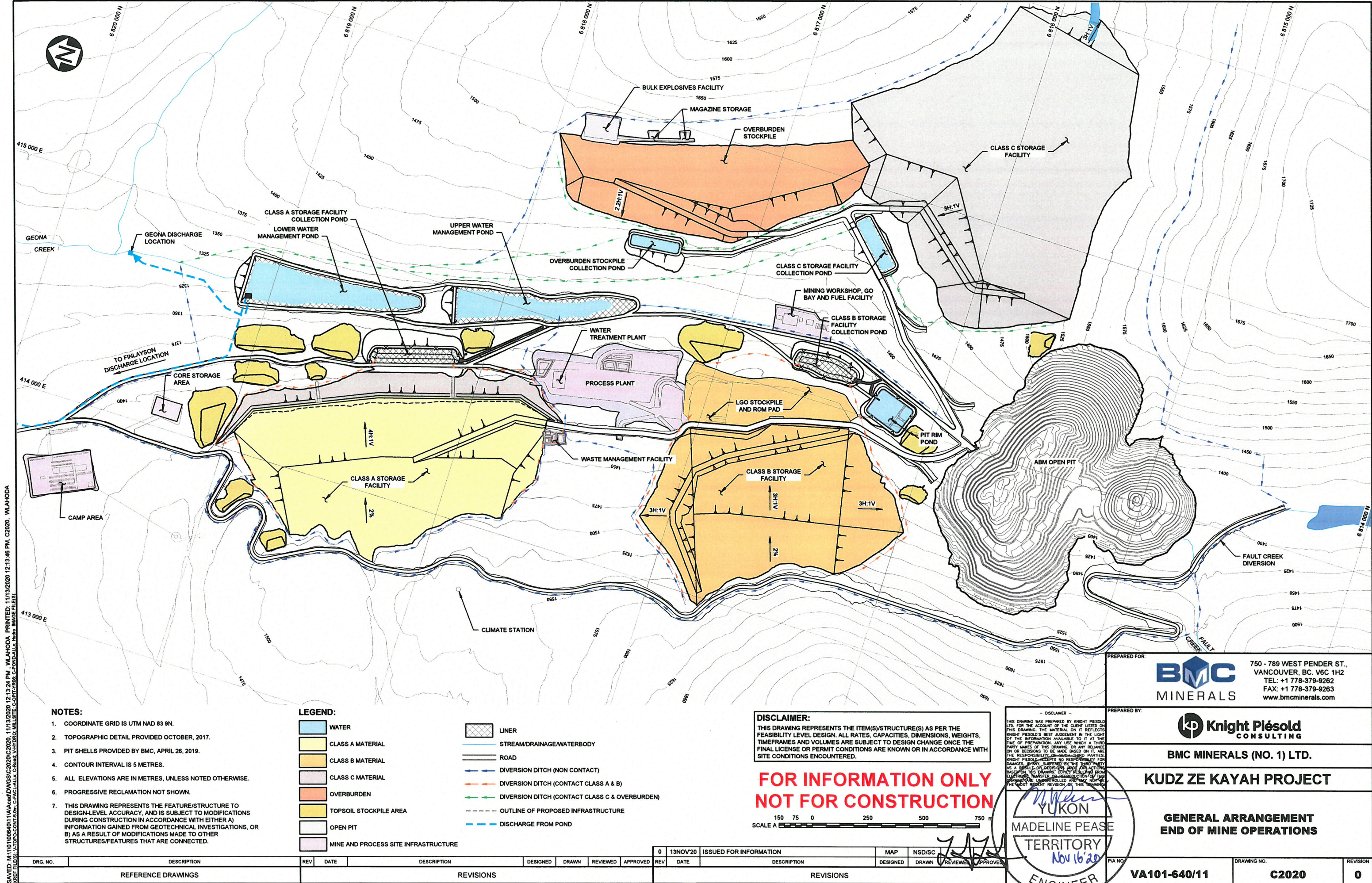
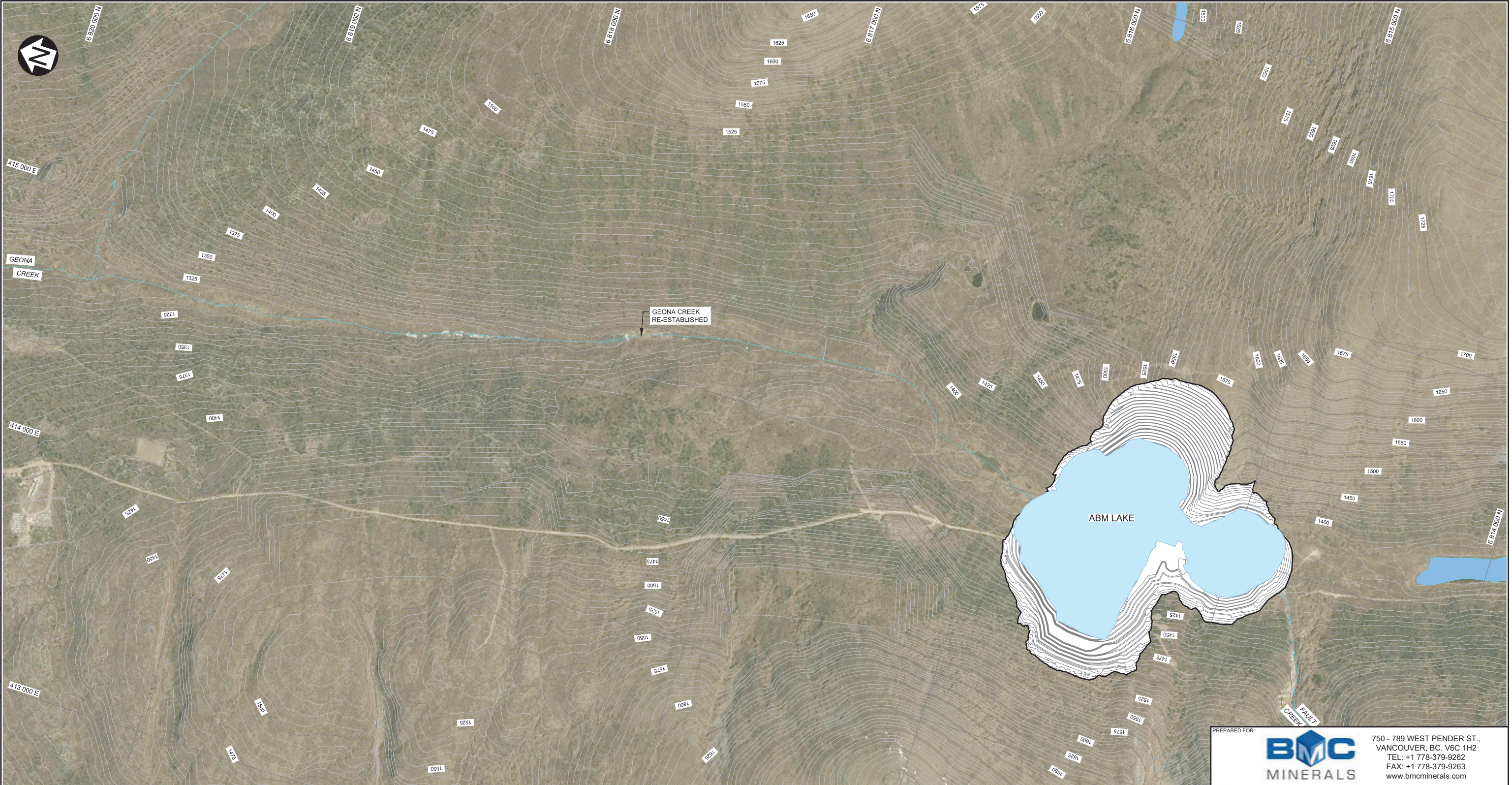


FIGURE 5-2: GENERAL ARRANGEMENT - END OF MINE OPERATIONS



SAVED: M:\10\100640\11\A\acad\DWGS\C2027_827\2020 1:12:13 PM. SCHIZAR
XREF FILE(S): C:\PAC-ALL\X-V-HYDRO-MILLSITE-C-ROAD-CLSR-HYDRO-CLSR
C:\POND-ALL\X-V-HYDRO-MILLSITE-C-ROAD-CLSR-ORTH 2018 K2X IMAGE FILE(S): ORTH 2018 K2X



- NOTES:**
1. COORDINATE GRID IS UTM NAD 83 9N.
 2. TOPOGRAPHIC DETAIL PROVIDED OCTOBER, 2017.
 3. PIT SHELLS PROVIDED APRIL 26, 2019.
 4. CONTOUR INTERVAL IS 5 METRES.
 5. ALL ELEVATIONS ARE IN METRES, UNLESS NOTED OTHERWISE.

- LEGEND:**
- WATER
 - STREAM/DRAINAGE/WATERBODY
 - ROAD

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Figure Previously Issued as KP Drawing

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KUDZ ZE KAYAH PROJECT

**FIGURE 5-4
GENERAL ARRANGEMENT
POST-CLOSURE**

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5.2 COMMUNITY SETTING

The sections below provide a brief description of the community setting of the SEMP which consists of the communities of Ross River, Watson Lake, Faro, and Whitehorse (Figure 3-1).

5.2.1 Ross River

The community of Ross River is located on the south bank of the Pelly River near the confluence of the Ross and Pelly Rivers. The South Canol Road runs through the community with a seasonal ferry providing access to the North Canol Road during the summer. The community is approximately 10 km from the Robert Campbell Highway. In June 2023, the Yukon Bureau of Statistics estimated the population of Ross River at 407.

Ross River is the home community of RRDC and it is a predominantly First Nation community. Self-reported First Nation people make up nearly 80% of the population of the community (Yukon Bureau of Statistics, n.d.).

RRDC negotiated but chose not to ratify a land claim agreement with Canada and the Yukon under the Umbrella Final Agreement (UFA). As such RRDC is not recognized as a self-governing First Nation under the UFA and the relationship with the federal government is still managed under the federal *Indian Act*. RRDC does see itself as exercising inherent self-government rights over its Traditional Territory and maintains a rights and title claim over its Traditional Territory. RRDC delivers a variety of services to its citizens in the community. The broader community of Ross River has no form of local or municipal government.

Policing in Ross River is the responsibility of the Royal Canadian Mounted Police (RCMP) who maintain a detachment in the community. Fire and ambulance services are provided by volunteer organizations. YG maintains a health centre staffed with community nurse practitioners in the community. The Ross River School offers Kindergarten through Grade 12.

Yukon University operates a satellite community campus in Ross River. The community campus provides academic upgrading courses, General Educational Development (GED) tests, computer training and various occupation-related courses.

5.2.2 Watson Lake

The community of Watson Lake is situated in the south-eastern corner of the Yukon at the junction of the Alaska Highway and the Robert Campbell Highway. Watson Lake, along with neighboring Upper Liard, Lower Post, Two Mile and Two and One-Half Mile Villages, are the home communities of the LFN.

The LFN negotiated but chose not to ratify a land claim agreement with Canada and the Yukon under the UFA. As such, the LFN is not recognized as a self-governing First Nation under the UFA and the relationship with the federal government is still managed under the federal *Indian Act*. The LFN does see itself as exercising inherent self-government rights over its Traditional Territory and maintains

a rights and title claim over its traditional territory. The LFN delivers a variety of services to its citizens in the community.

Over the past decade the population of Watson Lake has remained relatively stable at around 1,500 citizens. In June 2023, the Yukon Bureau of Statistics (reported the community's population as 1,506. Self-reported First Nation people made up 43% of the community's population in 2023 (Yukon Bureau of Statistics, 2023.).

Watson Lake itself has been an incorporated municipality since 1984 and the Town collects property taxes, delivers a variety of municipal services, and has the authority to pass bylaws in the municipality. The LFN acts as the only form of local government in Upper Liard, Two Mile and Two and One-Half Mile Villages.

Policing in Watson Lake is the responsibility of the RCMP who maintain a detachment in the community. The fire department is largely staffed by volunteers. YG has built and maintains a regional hospital staffed with doctors, nurses and support staff. YG also provides the ambulance services in Watson Lake with assistance from volunteers after hours.

The Johnson Elementary School offers Kindergarten through Grade 7 and Watson Lake Secondary School offers Grades 8 through 12. Yukon University operates a satellite community campus in Watson Lake. As in other rural communities, the campus provides academic upgrading courses, GED, computer training and various occupation-related courses.

In 2000, Watson Lake opened its new recreation centre that features a community hall, meeting rooms, squash courts, fitness room, a youth centre, bowling alley, hockey arena, and curling club. The community also boasts a downhill ski facility and a seasonal swimming pool.

5.2.3 Faro

Faro is located approximately 190 km (359 km by road) northeast of Whitehorse and 10 km from the Robert Campbell Highway.

According to Yukon Bureau of Statistics data, in June 2023 Faro's population was 457, an increase of 60 since 2013. The Yukon Bureau of Statistics indicates self-reported First Nation people made up 24% (110 residents) of the Faro population, compared with a Yukon-wide average of approx. 21%. The 2021 Census of Population found that Faro had fewer one-parent families than Yukon (4.4% of families versus 18.7%) (Statistics Canada, 2021).

Faro has been an incorporated municipality since 1970 and the Town collects property taxes, delivers a variety of municipal services, and has the authority to pass bylaws in the municipality. YG provides other community infrastructure and services including the school and the health centre.

Policing in Faro is the responsibility of the RCMP who maintain a local detachment. Fire protection, ambulance and search and rescue services are provided by volunteer organizations.

YG maintains the Faro Community Health Centre staffed by nurse practitioners. The territorial government also provides schooling in Faro through the Del van Gorder School which offers classes from Kindergarten through to Grade 12.

Faro has a municipal recreation centre that offers a variety of programs and recreation opportunities, and a golf course that winds its way through the centre of the community.

5.2.4 Whitehorse

Whitehorse, Yukon's capital city, is located at the head of navigation of the Yukon River and is the largest community in the Territory.

Between 2013 and 2023, the population of Whitehorse and surrounding area has grown from 28,242 to 35,770; an increase of approx. 21%, per Yukon Bureau of Statistics data from October 2023. Whitehorse's population is reasonably closely balanced between men and women (23,013 vs. 22,156 respectively). Whitehorse, due to it having a large majority of Yukon's population, is leading the overall aging of the territory's population with large relative increases in the population of those 60 years of age and older (Yukon Bureau of Statistics, n.d.).

In 2023, 15.8% of the city's population self-identified as Aboriginal compared with a Yukon-wide average of approx. 21%. The 2021 Census of Population found that one-parent families made up 18.7% of all census families in Whitehorse (Statistics Canada, 2021).

Whitehorse has been an incorporated municipality since 1950 and the City collects property taxes, delivers and extensive variety of municipal services, and has the authority to pass bylaws in the municipality.

5.2.5 Traditional and Current Local Economy

The Project occurs in the Traditional Territories of the RRDC and LFN, both of whom have a long history of land and resource management within their territories, according to their own customs and traditions. Knowledge of the area and associated cultural practices have been passed down through the generations. RRDC's and LFN's cultural traditions and identities are deeply connected to the landscape and the continuance of traditional land uses. RRDC and LFN have a strong reliance on the land and its resources for sustenance, economic gain and the continuation of their cultural identity and wellbeing. Important traditional economic values include hunting and harvesting of culturally important species (such as caribou, moose and other wildlife), trapping of fur-bearers, fishing, and collecting culturally important plants, materials and medicines. Additional information related to the traditional economy is described in Section 9.1.

The Project also overlaps with a part of Outfitter Concession #20, held by Yukon Big Game Outfitters. Discussions with the outfitter typically occur annually to discuss activities in the Project area, or more frequently when active exploration and the outfitting activities overlap. BMC will continue to communicate openly with Yukon Big Game Outfitters and provide regular updates on proposed plans for Project development. BMC will work with Yukon Big Game Outfitters to find a convenient time and method to regularly connect and discuss concerns.

In addition to guide outfitting, the other current local economy includes: mineral exploration; reclamation of closed mines; care and maintenance of closed mines; and tourism. The YESAB Screening Report for the Project describes tourism in the region as follows:

“The Project overlaps the Robert Campbell Tourism Region, which includes the communities of Faro and Ross River. According to the Tourism Branch, popular activities in this region include canoeing, hiking, sport fishing, hunting and wildlife viewing. The Tourism Branch also identifies the following tourism infrastructure in proximity to the Project: fishing on Finlayson Lake (30 km from the Project), Frances Lake and Frances Lake Lodge (50 km from the Project) and McEvoy Lake and Inconnu Lodge (40 km from the Project).³¹² Additionally, there are several smaller lakes and rivers with canoe put-in locations throughout the region.

As well, wilderness tourism operators may be operating in the area, though none were specifically identified during the assessment. The Wilderness Tourism Association of the Yukon identifies 20 registered wilderness tourism companies that offer services in the Campbell Region.

There are two YG-run campgrounds on the RCH (between the Project site and Watson Lake, the area of heaviest expected mine-related vehicle traffic): Simpson Lake (km post 81) and Frances Lake (km post 171). North of the project on the RCH (near Ross River), is the Lapie Canyon Campground (km post 364)”.

6 EMPLOYMENT AND TRAINING

6.1 EMPLOYMENT

The planned typical shift rotations are 2 weeks on and 1 week off with certain staff on 9 days on and 5 days off rotation. Contractors will typically work a similar schedule to the 2 weeks on and 1 week-off roster.

There will be different ways of transporting workers depending on where their point of hire is located. Local employees from Ross River, Faro and Watson Lake will likely be driven to site by a contracted or BMC shuttle to and from their respective communities. There is also the potential of flying these employees to site; however, that will depend on the number of employees on a shift, weather, time of year and other factors. The percentage of local employees will not be known until construction and operations are commenced; however, using a figure of 25% (80 personnel) of the total workforce would mean that there would be three shuttle trips per week to transport them between site and the local communities.

All other direct employees will have a point of hire of Whitehorse and will be flown from Whitehorse to Finlayson Lake airstrip and then transported by shuttle to the site. Using the above estimate, 75% (250 personnel) would travel from Whitehorse. Each week would require 5 flights (18 passengers per flight) between the two airports and three bus trips between Finlayson Lake airstrip and site, if some of the flights were on the same day.

Accommodation on site during operations will be at a 350-person camp that will be run hotel style. The camp will be typical of an accommodation complex of this size in northern BC or Yukon and will provide all necessary facilities for the workforce. Catering will be provided by a contractor, and camp management will be by BMC or a specialized camp management contractor.

6.1.1 Employment: Construction Phase

Estimated construction labour requirements are approximate at present and will not be fully defined until the final engineering stage. There will be different sub-phases and labour requirements within the Construction phase, and requirements for specialized labour will fluctuate with each sub-phase.

There will be two main areas of focus during construction: Process and Water Treatment Plant construction and earthworks. The estimated total number of people employed at the height of Process and Water Treatment Plant construction will be 300 with an additional 50 involved in earthworks. Process Plant construction trades required will be welders, electricians, carpenters, surveyors, crane operators and riggers and other trades associated with a large industrial construction project. The earthworks component will require operators of all open pit mining machinery.

Ross River, Faro and Watson Lake all have relatively high proportions of their populations working in the trades, transport, equipment operation and related occupations. The Project will have high demand for these types of skills during all phases, with demand generally being the highest during the Construction phase.

6.1.2 Employment: Operations Phase

The estimated employment numbers for the Operations phase are shown in Appendix E (Table 1 through 5).

Table 1 of Appendix E includes a summary of the entire Operations phase by department, while Tables 2 through 5 present the breakdown by department. During production, the total personnel is estimated to range from 287 to 420, while the total personnel on site at one time is estimated to range from 191 to 278.

In addition, the ore haul contract is expected to employ approximately 120 people.

In terms of overall employment numbers, the region is estimated to experience an additional 811 Full Time Equivalents (FTE) in the Yukon's workforce over the Project period (Ernst and Young, 2017). Of these 811 FTE, around 420 will directly employed in the mining operation while the remainder will be employed in supporting industries or as a result of generally higher economic activity, income and spending in the Territory.

6.1.3 Employment: Closure and Reclamation

Firm employment numbers and labour costs during the closure and reclamation phase will not be known until detailed engineering is complete. Labour estimates based on the Project's Reclamation and Closure Plan (BMC, 2026a) indicate a total of approximately 500 person-years of employment during the Closure period, with most of the effect occurring in the 3-year Active Closure phase.

6.1.4 Employment Enhancement Measures

The point of hire for the Project will be the Yukon (i.e., Whitehorse, Ross River, Faro and Watson Lake). This will help ensure that the Project's residual effects on economic growth are local and beneficial.

BMC will continue to honour the terms of the SEPA by working with the Kaska to fill openings at the Project (for both BMC and its contractors) for qualified persons, and to the extent permitted by law, give preference to qualified job applicants in the following priority:

- Ross River Dena Council citizens;
- Other Kaska citizens;
- Other Yukon First Nation citizens;
- Other Yukon residents; and
- Others.

The preferential order may be updated under a modernized SEPA.

BMC will:

- Encourage the participation of local communities, local First Nations and associated businesses in its projects wherever practicable, including but not limited to: continue posting job adds on local community's bulletin boards, BMC's facebook page and website; continue reaching out to LFN and RRDC's respective development corporation's for contracting opportunities, continue attending career fairs in the local communities; continue regular communications with current staff on new job opportunities; continue regular discussions with local contractors on upcoming opportunities.
- Develop and implement community relations management procedures and strategies that includes business alliances, employment and training initiatives on safety in the workplace and practical operating skills;
- BMC will pay men and women equally for the same job;
- BMC will ensure career advancement opportunities are provided to women as well as men;
- BMC will ensure employment needs and numbers are shared with the municipalities; and
- BMC's plans for continued exploration on the KZK Claims to delineate further ore reserves and extend the mine life which will extend employment duration.

6.2 EMPLOYABILITY (EDUCATION, TRAINING AND EXPERIENCE)

The Project's employability enhancement measures include:

- BMC's Mentor Program.
- General workplace training for employees.
- Trades apprenticeships.
- BMC and its contractors are committed to providing the workplace training required by employees to do their jobs in a safe and effective manner, including ensuring all employees are supported to advance their employment within the Project. Workplace training will be provided in several formats (i.e. written, verbal, video, person to person etc).
- BMC's Community Liaisons will assist community members with resume building and will inform applicants on camp life.
- BMC will participate annually in career fairs at the local schools to talk and educate youth on the skills needed for the various jobs at the mine.
- BMC and its contractors will provide training through trades apprenticeships based on specific trade interests from the local community members and Kaska citizens.

Apprenticeships will be trained by qualified Red Seal journeypersons and will be registered through the Yukon apprenticeship program.

- To the extent that the Project requires summer employees:
 - BMC will cooperate with Kaska to provide opportunities for Kaska students, particularly those who are studying in the areas of mining, geology, process and other engineering, and business administration.
 - BMC will also consider hiring non Kaska summer students who are studying in the areas of mining, geology, process and other engineering, and business administration.
- All employees and contractors of the Project will undertake safe, respectful and inclusive training, to include cultural and First Nations awareness, harassment and gender-based violence and discrimination prevention as well as bullying and codes of conduct. These programs will be developed by qualified professionals and individuals recognized and/or recommended by LFN or RRDC as having applicable cultural knowledge. The programs will be delivered to all people on site and will be included in the orientation along with access to all policies and procedures.
- BMC will work with the local colleges and Yukon University to identify gaps in programming and courses to ensure community members have local training options.
- BMC will annually review and forecast training needs to in part meet technology changes and innovation.

The Mentor/ Liaisons will ensure that First Nation employees are aware of training and advancement opportunities and will assist the employee(s) in pursuing them.

Training and apprenticeship's programs will be developed (in part) through engagement with:

- Local training and education institutions such as Yukon University, high schools (i.e. Ross River, Watson Lake, and Faro);
- Government departments such as the Yukon First Nation Education Directorate and Yukon First Nation School Board; and
- Liard First Nation and Ross River Dena Council.

This engagement will identify the training needs in the communities and identify where BMC can implement its own training programs and/or support any existing community based training programs with linkages to the mining and exploration industry. The target participants will be Yukon residents and Kaska citizens. Career progression and workforce transition will be a component of the program (including during mine closure) (see Chapter 12).

The development of the training and apprenticeship programs will be consistent with the requirements of the current SEPA and any amended or new SEPA (including the BMC-Kaska Scholarship Program which to date has funded over \$300,000 in 219 scholarships and bursaries awarded to 202 individual students since the program commenced).

7 ECONOMIC BENEFITS TO GOVERNMENTS

The Project will have the beneficial effect of providing economic growth to the Yukon and its communities.

In Yukon the current Gross Domestic Product (GDP) is dominated by Public Administration, Health Care and Social Assistance and together account for 31.6 % of GDP. Northern territories by their nature have higher than normal expenditures in these areas however for comparison those expenditures account for only 13.4% of British Columbia's GDP.

Economic growth is dependant on private sector investment in the economy. An independent assessment of the Project conducted by Ernst and Young (2017) estimated the Project would account for approximately 9% of Yukon's GDP at that time. Yukon GDP has grown since that time, but the Project's contribution is still expected to be in the 9% range as expenditure estimates for the Project have also grown over time.

The base case presented in the Project's 2023 Economic Review included the following Project expenditures (\$CAD):

- Construction Capital - \$647M
- Sustaining Capital - \$260M
- Operating Costs – \$1699M
- Concentrate Haul - \$396M
- Federal Tax Paid Life of Mine (LOM) - \$266M
- Yukon Tax Paid LOM - \$213M
- Royalties to Yukon LOM - \$282M

The opportunity presented by the Project to drive economic growth in a small overall economy such as the Yukon's is substantial. Direct expenditures by BMC in the Yukon to employees, contractors, and suppliers will get reinvested in goods, services, and employment driving consumer consumption of local goods and services.

Annually, BMC will submit a financial forecast to YG for the current calendar year, and a financial forecast for the next calendar year. BMC will provide RRDC and LFN with a copy of any financial forecast submitted to YG subject to the redaction of confidential material. The financial reports will be sufficiently detailed to provide an understanding of, and a forecast for, the following: a) revenue generated from the Project; b) mineral/commodity sales or transfers; c) capital expenditures; d) costs associated with development, operation, and maintenance of the Project; e) depreciation expectations; and f) expected inventory of minerals at the end of the calendar year.

8 PROCUREMENT STRATEGY

BMC will continue to apply its Kaska hiring preference and to honour its SEPA commitments to Kaska business. It will rigorously apply its Employment and Anti-Discrimination Policy (Appendix A) and will continue to operate its local offices in Whitehorse, Ross River and Watson Lake.

8.1 BUSINESS OPPORTUNITIES

BMC's Business Integrity Framework (BIF) dictates how the company conducts its operations. The BIF outlines BMC's obligations for ethical, legal, and social behavior of the highest standard. Flowing from the BIF are Policies and Operational Procedures.

In addition to the BIF, Policies, and Procedures, BMC is bound by the SEPA signed with Kaska First Nations. This agreement outlines commitments and processes designed to ensure Kaska businesses have opportunities to participate in the development, operation, reclamation, and closure of the Project. BMC has proposed a modernized SEPA with Kaska that, among other things, guarantees direct administrative payments as well as a minimum level of contracts for Kaska businesses over the life of the Project.

Section 5.0 of the current SEPA, *Contracting Opportunity Guidelines*, outlines how BMC will provide contracting opportunities for Kaska businesses over the life of the Project. It includes:

- Definitions of Kaska Businesses;
- Processes for responding to tender opportunities;
- Obligations on BMC to provide tender forecasts;
- Right of Kaska to provide the first proposal for specific opportunities;
- Obligations on BMC to include "local benefits" clauses in all non- Kaska contracts;
- Obligation on BMC to give "local benefits" meaningful consideration in evaluating tender bids;
- Obligation on BMC to consider unbundling major contracts to allow opportunities for smaller contractors;
- Exploring concentrate haul opportunities;
- Guaranteed road maintenance contracts including equipment purchase by BMC; and
- Annual reporting requirements.

Section 5.1(d) of the SEPA further identifies several specific areas where Kaska will have the right to submit a first proposal for contracts including:

1. Winter road construction.

2. Site clearing for permanent access road.
3. Access road security.
4. Miscellaneous “civil” work.
5. Camp catering.
6. Reclamation work.
7. Janitorial services.
8. Laundry and linen services.
9. Line-cutting.
10. Expediting.
11. Mine site fuel supply.
12. Other areas to be added by the Committee.

This list is not to be considered exhaustive. In addition, the SEPA includes the provision that BMC shall ensure that all its sub-contract tender documents contain a “local benefits” component, and that BMC shall give the local benefits component meaningful consideration when evaluating tender bids. This will benefit both Kaska and non-Kaska businesses.

All of BMC’s contractors will also be required to honour the letter and the spirit of the SEPA.

8.1.1 Procurement

BMC is committed to maximizing use of local contractors and suppliers throughout construction, operation, reclamation and closure of the Project. One of the key objectives of BMC’s Procurement Policy is:

“To support delivery of a positive legacy to the local communities within which we operate by providing and prioritizing sustainable opportunities for local First Nation, Yukon, and Canadian businesses”.

To achieve this objective BMC intends to:

- Continue efforts to build capacity among local contractors through contracting opportunities in the delivery of seasonal exploration and camp development programs, including but not limited to:
 - Seasonal road opening and maintenance
 - Catering and camp maintenance
 - Fuel supply
 - Drilling
 - Grocery and materials supply; and
 - Expediting.

- Continue working with individual contractors to ensure health and safety programs are established and functioning that will allow the contractor to work on the Project.
- Assist individual contractors in contract development and agreements.
- Establish and deliver a Procurement seminar and materials for all Contractors prior to a construction decision, so they fully understand BMC requirements and procurement processes. Repeat seminar as required.
- Facilitate open houses for small businesses that are interested in working with BMC.
- Provide start-up businesses and existing businesses information on where they can obtain loans, access bookkeeping assistance, training etc.
- Establish an Approved Suppliers list identifying Contractors and Suppliers that meet BMC requirements and provide opportunities for Contractors and Suppliers to be added to the list.
- Publish a bi-annual tender forecast to allow Contractors and Suppliers time to prepare to bid on individual contracts or get on the Approved Suppliers list.

In all procurement options, BMC will employ the principle of Best Value Procurement (BVP). BVP recognizes that the lowest direct cost does not necessarily equate to the highest overall value. BVP considers multiple factors in addition to cost, including social benefit, environmental sustainability, locality, reliability, technical fit and quality. However, in all procurements, cost will be a major consideration.

BMC recognizes there is capacity within the Yukon to deliver many of the services and goods that will be required for construction and operation of the Project. However, there are certain elements that require specialist experience that cannot be met locally. In these cases, BMC will encourage outside specialist companies to provide opportunities to Kaska and Yukon contractors so they can gain experience and build their business capacity. Bids submitted by specialist contractors will be evaluated through the BVP lens for local content and benefits.

8.1.2 Additional Agreements

Until BMC is certain of obtaining permits for development and operation of the Project, it is not practical to sign long term commercial agreements with any supplier, Kaska, Yukon, or other. However, BMC is pursuing Letters of Intent with various suppliers to establish commitments to proceed to commercial discussions at the appropriate time.

As a result, BMC has commenced preliminary discussions around commercial opportunities with individual Kaska Development Corporations. These discussions centre around opportunities not currently identified in the SEPA including power generation, tank farm establishment, grocery supply, crew transportation, warehousing and logistics support, and concrete and aggregate supply.

BMC is also looking to extend the Letter of Intent approach to other suppliers in the Yukon for services such as air transport, medical services, and civil engineering.

9 TRADITIONAL LAND USE AND CULTURAL HERITAGE

9.1 SETTING

The region has long been used by the Kaska to hunt, trap, fish, gather plants, and seek shelter. There are traditional trails in the regional area used by Kaska citizens to travel between key traditional use locations. There are two main access routes to the proposed Project area, including from the east starting at Francis Lake along Money Creek as well as from the north at Pelly Banks through Finlayson Creek. The area in and around the proposed Project has been of particular importance for hunting of big game, such as the Finlayson Caribou Herd, moose, and sheep, especially in the North Lakes area (south of the Project). There are several Kaska cabins in the region, including nearby locations along North Lakes, Money Peak, and Wolverine Lake with more distant locations along Frances Lake, Pelly Banks, and Money Creek. While there are no cabins or permanent residences that have been identified in the Geona Creek Valley or in the area of Finlayson Creek that could be impacted by Project development, Kaska have indicated that they “make direct and indirect use of waters downstream from the proposed mine, both through drinking and through reliance on the fish and animal species who rely on those waters – which intersect important caribou and other ungulate and wildlife species movement corridors” (LFN, 2023).

Kaska have indicated that they “are still living with the negative impacts of five failed mines in Kaska territory – Faro, Cantung, Ketza, Sa Dena Hes, and Wolverine” (LFN, 2023).

By the nature of the proposed development, the majority of the proposed Project area within the Geona Creek valley will not be available for traditional land use activities (i.e., hunting, fishing, and harvesting berries and traditional medicines, travel etc.) until the Post-Closure period.

9.2 MITIGATIONS

9.2.1 Traditional Economic and Land Use Activities

BMC will implement extensive mitigation measures to reduce any adverse effects of the Project on traditional economic and land use activities including:

- Implementation of the Traffic Management Plan will mitigate the adverse effect of increased traffic on wildlife;
- Implementation of the Wildlife Protection Plan will also mitigate adverse effects on wildlife;
- Implementation of the Water Management Plan will mitigate adverse effects on water quality, aquatic resources and other aspects of the natural environment that rely on water;
- Implementation of the Fish Offsetting Plan will facilitate the removal of the fisheries passage barrier at the Robert Campbell Highway. This will result in Finlayson Creek being able to be used again for fishing as the fish will move back into the creek;
- Project activities include not constructing any of the Project facilities outside of the Geona Creek Valley (i.e. the Project will not affect the ability of Kaska to fish in North Lakes, lower Finlayson Creek and other traditional land use waterbodies in the region);

- Additional mitigation measures to protect the aquatic ecosystems to the south is the pit crest height design of the ABM open pit, which will ensure all groundwater and surface water from the pit will flow north (i.e. no long term impacts to the South Lakes watershed);
- Fish tissue monitoring results will be communicated to RRDC and LFN citizens (likely by the RRDC/LFN Kaska citizen or consultant who participates in or leads the monitoring program). This will help ensure that the community is re-assured that the mitigation measures are in fact protecting fish health and that the fish can safely be consumed by the traditional land users (See Section 8.2 of the Environmental Monitoring Surveillance and Reporting Plan);
- In order to minimize the effects on wildlife and wildlife habitat, BMC has minimized the Project footprint so that all Project infrastructure is confined to one watershed. By minimizing the impact to the habitat, the effects on the land users who use the land base for hunting the wildlife are also reduced;
- Several other management plans will mitigate adverse impacts on air quality, noise and vegetation (Table 3-3);
- All firearms are prohibited unless otherwise authorized by BMC management (Appendix B);
- All hunting of wildlife or recreational shooting by employees, contractors and visitors is strictly prohibited, as outlined in the No Firearms Policy (Appendix B); this policy will be communicated to all employees and contractors during the site orientation;
- Recreational use of all-terrain vehicles (ATVs) and snowmobiles are prohibited (Appendix B);
- Access and use of the Tote Road has been strictly controlled since the 1990s and there will be ongoing access control to the mine site. Use of the Access Road during Project operations to access recreational areas for ATV and snowmobile use will be strictly prohibited. This will mitigate impacts on wildlife from overhunting;
- As a component of the Traffic Management Plan BMC will develop measures and procedures that will be implemented to accommodate the use of the road by persons holding valid authorizations under the Resource Roads Regulation for the purpose of exercising existing or asserted Aboriginal or treaty rights. BMC will not impose restrictions or requirements that would materially impede access by access authorization holders, except where necessary to address reasonable concerns respecting safety, environmental protection, or the operational integrity of the road;
- As part of the SEPA, will continue to pay a land use interruption supplement to mitigate the effects of the Project on RRDC citizens who hold trapping rights under the registered group trapline, and operated trap lines within the Project area;
- Extensive other mitigations in the existing and proposed modernized SEPA are intended to offset the impacts on traditional land use (i.e. socio-economic benefits);
- BMC will continue to ensure that LFN and RRDC have opportunities to participate in and influence the development of environmental and socio-economic management plans and

closure objectives developed for the Project to ensure they collaboratively design, collect, report, manage and communicate the results of the monitoring programs to their citizens.

- BMC will ensure that LFN has the opportunity to be part of the BMC–Kaska environmental, cultural and heritage management program.
- Planning annual vacation time (up to two one-month periods of time off per annum for those on the 2-week-in, 1-week-out shift) to allow for extended leave to spend more time conducting traditional activities;
- Allowance for up to 14 days of unpaid leave to all Yukon First Nation employees to allow for the exercising of Aboriginal rights related to: a. the pursuit of traditional land use activities; this will be 14 days to allow sufficient time on the land; and attending culturally important events (potlaches, dances, ceremonies, culture camps);
- Sponsor on-the-land cultural activities that promote sharing of Traditional Knowledge and practices in the Project area for the duration of construction, operation and closure phases of the mine. The camp details, location and structure will be developed by potentially affected First Nations (once a Final Investment Decision is made allowing the Project to proceed to Construction); and
- Implementation of RRDC Elders Conditions of Consent related to mitigating impacts on land and traditional land use resources:
 - No new roads built outside of the Project area.
 - No Fly-zone to the east, south and west of the Project during caribou calving.
 - Co-Management of Fish & Wildlife (this condition was the basis for the proposed BMC–Kaska environmental, cultural and heritage management program).
 - Establish Ross River Oversight Board made up of Land Stewards of that area - throughout the life of the mine.
 - BMC provide funding for two to three Dena Land Guardians to monitor and enforce Dena laws throughout the mine life.
 - No hunting or fishing by non-Dena employees.

Additional mitigation measures are included in the Project's Decision Document, that are the responsibility of YG to implement (in collaboration with LFN and RRDC). These will further mitigate impacts on the Finlayson Caribou Herd, which is an invaluable resource for Kaska.

The Environmental Monitoring, Surveillance and Reporting Plan describes the monitoring of the resources that Kaska rely on for their traditional use and health, including but not limited to: Air Quality, Surface Water Quality, Surface Water Quantity, Fish and Aquatic Resources, Soils and Vegetation. The Wildlife Protection Plan describes the monitoring for wildlife. While these monitoring procedures are not mitigations, monitoring will be used to identify the need for adaptive management of each of the resources such that additional mitigations will be applied prior to the resource being unacceptably impacted. A tiered trigger and adaptive management approach is described in the Adaptive Management Plan and includes a description of how BMC intends to engage with Kaska during implementation of the Adaptive Management Plan.

BMC understands that YG has a crown duty to consult and accommodate on the impacts of the Project. This accommodation will also contribute to offsetting the impacts to Kaska's traditional land use activities.

9.2.2 Gathering Traditional Medicine

Due to BMC's commitment to public health and safety, the operating area of the Project (i.e. the Geona Creek Valley) will not be available for collection of traditional medicines; however, the company will work with local Elders to find a way to allow collection in other areas where safety will not be compromised. As part of the progressive reclamation and final reclamation planning, BMC has committed to working with RRDC in identifying the species that will be used for the reclamation purposes and developing a seed collection program and seed bank in Ross River. Therefore, the potential effects on traditional medicines will be in part mitigated through this program. However, not all traditional medicines will be amenable for use in reclamation.

Additional mitigations related to traditional land use are described in Section 9.2.1.

9.2.3 Language Preservation and Restoration

Indirectly, First Nation people who choose to work at the mine could, if they have not been working full time prior, have less time and opportunity to use their language. However, most working age First Nation people will face this challenge no matter where they are employed.

BMC will strictly enforce its Employment and Anti-Discrimination Policy (Appendix A) and its Community Relations Policy (Appendix A) BMC states: *We will strive for the improvement of cross-cultural awareness through the induction, training and education of our personnel in local Indigenous Peoples culture and workplace relationships.*

BMC is committed to hiring Kaska citizens through the SEPA. BMC will also be hiring two community mentors to assist Kaska employees while on-shift and off-shift. Through these measures, BMC intends that Kaska employees will be comfortable and supported to speak Kaska while at work.

9.2.4 Culture, Traditional Knowledge and Practise

Indirectly, First Nation people who choose to work at the mine could, if they have not been working full time prior, have less time and opportunity to pursue these activities. However, most working age First Nation people will face this challenge no matter where they are employed.

The key mitigations (from above) that will be implemented to mitigate this potential effect to culture, traditional knowledge and practice are:

- Planning annual vacation time (up to two one-month periods of time off per annum for those on the 2-week-in, 1-week-out shift to allow for extended leave to spend more time conducting traditional activities;

- Allowance for up to 14 days of unpaid leave to all Yukon First Nation employees to allow for the exercising of Aboriginal rights related to: a. the pursuit of traditional land use activities; this will be 14 days to allow sufficient time on the land; and attending culturally important events (potlaches, dances, ceremonies, culture camps); and
- Sponsor on-the-land culture activities that promote sharing of Traditional Knowledge and practices in the Project area for the duration of construction and operation of the mine. The camp details, location and structure will be developed by potentially affected First Nations (once a Final Investment Decision is made allowing the Project to proceed to construction).

Additional mitigations from RRDC Elders that are within the category of “cultural benefits” that will be implemented include:

- BMC will hire Dena people to cut and clean trail from Ross River to Fyre Lake, including signs (funding for this will come from modernized SEPA payments);
- BMC will assist RRDC in the purchase of Inconnu Lodge (funding for this will come from modernized SEPA payments);
- Rematriate/Repatriate Grave Sites / Funeral Pyre Sites (while none overlap with the Project area, regional ones have been identified by the Elders); and
- Assist in Establishment of Protected Area zone in Cultural Area south of the mine site (tentatively agreed to support and is pending further discussion).

Additional mitigations from RRDC Elders that are within the category of “Dena Laws On-site” that will be implemented include:

- Conduct major ceremony to bless the area; and
- BMC to contribute to Dena World View Video and use it in job training.

10 COMMUNITY CONTRIBUTIONS AND BENEFITS

10.1 COMMUNITY EVENTS AND VOLUNTEERISM

BMC will continue to support and participate in community events and projects as the Project proceeds. BMC's priority is support in the local communities; however, it will support Yukon-wide initiatives as well. Areas where BMC has supported initiatives include:

- Community training initiatives;
- Support for school programs and initiatives;
- Support for cultural events and initiatives;
- Support for the arts;
- Support for youth sports;
- Support for First Nation People's Sports organizations;
- Support for Yukon Wide Sports organizations;
- Support for local Food Banks;
- Support for Community based Volunteer Fire Departments;
- Support for Conferences; and
- Community bereavement support.

As the Project proceeds to Construction and Operations BMC expects to increase the scope and amount of support offered.

10.2 RECREATIONAL FACILITIES AND OPPORTUNITIES

As the Project proceeds, BMC will consider making donations to community recreation projects on a case-by-case basis. Each community has a recreational space running various programs increasing wellness opportunities for its members. These are in the form of fitness activities, movie nights, Elder workshops, BBQs and more. BMC personnel currently attend and support some of these activities, and BMC expects that additional support will be considered once the Project is operating and the company is in a cash positive position.

11 COMMUNITY VITALITY

The following chapter outlines the mitigations related to potential community impacts. It is noted that the Faro Mine Remediation Project will be occurring at the same time as BMC's Project development and may have a cumulative impact on available community resources in Faro and Ross River.

11.1 POPULATION

Population and population growth can have both beneficial and adverse effects for small communities. Residents often appreciate the small population while also wishing for the increased amenities and activities that come with more people. There is often a complex web of reasons and motivations behind any decision by employees to relocate.

Faro has long attempted to increase its population to make the community more vibrant, achieve and maintain a population large enough to support more business services, make more efficient use of its existing infrastructure, and increase the tax base to allow the municipality to better maintain and upgrade its infrastructure. An influx of newcomers to Faro is desired by the community.

Faro especially attempts to attract families with children as new community residents. The Del Van Gorder School is operating far below its capacity and as the overall number of children shrinks, the incentive grows for parents of school age children to move to where there are more school age children, and more extracurricular activities with a broader social environment for their children. Families with children are also seen as more likely to be more active participants in the community and more likely to volunteer to create more community activities and events.

Faro has the available housing and related infrastructure available for people to relocate to the community. BMC's decision to make the Yukon the point of hire for the Project creates an incentive for employees from elsewhere to relocate to the Yukon and perhaps to Faro.

In the past, residents of Ross River and RRDC leadership expressed strong reservations about an influx of newcomers, wanting the community to remain stable or grow slowly. This outlook may have shifted somewhat as there appears to be more community support for population growth. And there is anecdotal evidence that RRDC citizens relocating back to the community are generally very welcome. However, as Ross River currently does not have any available housing or building land for newcomers, the Project will likely have no effect on the population of the community.

Watson Lake has the housing and related infrastructure available for people to relocate to the community. Like Faro, the general sense is that some community population growth would be a beneficial outcome. BMC's decision to make the Yukon the point of hire for the Project creates an incentive for employees from elsewhere to relocate to the Yukon and perhaps to Watson Lake. The community is also the logical logistical centre for the concentrate haul contract that will employ approximately 120 people. The concentrate haul employees will have an incentive to relocate to Watson Lake.

Whitehorse has the capacity to readily absorb an increase in population caused by Project employees relocating from outside of Yukon (BMC, 2017). Whitehorse, with its greater amenities and options for individuals and families is also the likely preference for relocating employees, especially those with children.

11.2 HEALTHY BUSINESS SECTOR

A healthy business sector provides economic benefits and strengthens the community by providing more services, potentially reducing the cost of living in the community and reducing the need for community members to work elsewhere.

The value expressed in this subcomponent is broader than simply having local community businesses capture additional contracts from the Project (see Section 8– Procurement Strategy). It is the desire for a broader and deeper local business sector that serves the whole community, increases the circulation of money within the community, and helps reduce the cost of living.

The Project is expected to have an indirect beneficial effect on this subcomponent through providing well paid employment and business opportunities to local firms. Higher incomes locally will lead to greater demand for goods and services, encouraging the diversification and growth of existing businesses and the establishment of new ones.

BMC will continue to provide local communities (Ross River, Watson Lake and Faro) with employment and business opportunities, especially through its SEPA with the Kaska.

11.3 REDUCING CRIME

People feeling safe and secure in a community, and especially safe from excessive or pervasive crime, plays a large role in community vitality. The Project will have only indirect effects, if any, on reducing crime levels. Increased employment opportunities can usually be expected to reduce crime. However, if increased incomes lead to increases in alcohol and drug use, then crime levels are likely to rise rather than fall.

The mitigation measures related to alcohol and drug use are included in BMC's Employee Support Policy and Fitness For Work Policy (Appendix A) and are described in Chapter 14 (Worker and Community Health and Safety).

11.4 REDUCING DISCRIMINATION AND RACISM

BMC will attempt to have a beneficial effect of reducing discrimination and racism by doing all it can to eliminate all forms of discrimination and racism in the workplace. The company's Employment and Anti-Discrimination Policy (Appendix A) reads, in part:

"All employment processes and ongoing employee performance evaluation shall be merit based, without regard to other factors such as sex, marital status, pregnancy, parental status, age, race, impairment, religion, political belief, social origin, lawful sexual activity, social preference and family responsibilities".

Managers and staff at every level of the organization shall ensure they and the people around them do not engage in discriminatory behavior. All employees will be held responsible for the implementation of this policy and relevant programs within their area of responsibility.

BMC will strictly enforce its Employment and Anti-Discrimination Policy prohibiting any form of discrimination or racism in the workplace. Complaints will be treated seriously and dealt with immediately. In addition to the community mentors providing a conduit to the Kaska, every department manager will have a specific requirement to maintain direct contact with the local communities.

All BMC directors, supervisors and managers will complete mandatory, ongoing (annual) cultural awareness training. The higher the level of employee within the company, the greater the degree of training required.

In its Community Relations Policy (Appendix A) BMC states: *“We will strive for the improvement of cross-cultural awareness through the induction, training and education of our personnel in local Indigenous Peoples culture and workplace relationships.”*

BMC will also hire two Kaska citizens (one from LFN and one from RRDC) as community mentors. The mentors will be responsible, in part, for building and maintaining Kaska employee’s workplace relationships and assisting with Kaska employee retention.

Additional mitigations related to reducing discrimination and racism are presented in Section 14 (Worker and Community Health and Safety).

11.5 INFRASTRUCTURE AND SERVICES

11.5.1 Housing and Land Availability

In order to mitigate impacts on housing availability BMC has adopted a position of preferential hire for local people. The point of hire for most personnel is expected to be in the Yukon. The three closest towns to the Project are Ross River, Faro and Watson Lake. BMC notes that the definition of a “local hire” is somebody that already lives locally. BMC considers it unlikely that new employees will relocate to Ross River given the lack of available housing. Minor increases are expected in Watson Lake, however, not to the extent that housing availability is impacted.

The town of Faro is different from Watson Lake and Ross River since the number of available houses in Faro outnumbers the number of residents likely to seek employment with BMC. BMC has purchased three apartment complexes in Faro, containing approximately fifteen 2-to-3-bedroom dwellings. These dwellings will be renovated and available for relocating staff as required. Excess dwellings will be made available to locals requiring accommodation.

BMC is committed to working with the communities of Faro, Ross River, Watson Lake and Whitehorse as well as RRDC and LFN Chiefs and Councils to ensure that employment opportunities and housing outcomes for locally employed BMC employees are optimized.

No additional mitigation is proposed for the City of Whitehorse given the programs adopted by the Whitehorse Council in relation to housing and the council's publicly stated housing targets.

11.5.2 Transportation Infrastructure

Project Construction and Operations will affect the Robert Campbell Highway. The expected daily average truck traffic during the Operations phase will be 26 trucks in each direction to and from the site per day. These trucks are expected to travel on the southern Robert Campbell Highway between the Project and Watson Lake. The Project truck traffic will therefore mean approximately doubling the daily traffic at the traffic counter at KM 110 (Tutchitua) where the daily year-round vehicle count varied from 17 to 44 over the 1997 through 2011 period. Although doubling the traffic count appears significant, the still-low absolute numbers means the Project will likely not have a large effect on the highway itself as the use is well within design parameters.

YG Highways has been upgrading portions of the Robert Campbell Highway and the Project proceeding will create an incentive to continue the upgrades and perhaps re-allocate other funding to where use is increasing. Additional details on highway maintenance and BMC's commitment to regular discussions with YG Highways is presented in the Traffic Management Plan.

11.5.3 Municipal Services – Water, Sewer, Solid Waste

Waste disposal and related mitigations for the Project are presented in the Waste Management Plan. Municipal water and sewer use from community infrastructure are not proposed for the Project. BMC has entered into a Memorandum of Understanding with the Town of Watson Lake to allow periodic use of the Watson Lake solid waste storage facility on an as needed basis with pre-approval from the Town.

11.5.4 Healthcare Services

The Project is not expected to have a measurable effect on the provision of healthcare services in the communities unless an unexpectedly large number of employees decide to relocate to Watson Lake or Faro over the course of the Project. Yukon Health provides hospital and medical services to communities. BMC will work closely with YG to ensure that they are aware of such possible changes. As required by the Workplace Health and Safety Regulations appropriate medical services will be provided on site (this is described in the Emergency Response and Health and Safety Plan and to a limited extent in Section 14 – Worker and Community Health and Safety).

11.5.5 Police Services

The Project is not expected to have a measurable effect on the provision of police services in the communities unless an unexpectedly large number of employees decide to relocate to Watson Lake, Faro or Ross River over the course of the Project. The police detachment's staffing levels are set by the police services agreement between YG Justice and the RCMP. These are based on population with a minimum which applies to Ross River and Faro.

11.5.6 Child Care

Childcare, or a lack thereof, may present a hurdle for parents who wish to take advantage of employment that requires them to be away from home for two weeks at a time. This hurdle is especially high for single parents. There is no organized childcare available on a round-the-clock basis for two weeks at a time. The only viable option for most parents in this situation is to rely on spouses or extended family for childcare. These caregivers in turn may rely on local childcare services for daycare.

BMC can provide some context to the characterization of the availability of daycare in Yukon's small communities. BMC is aware of Yukon's unique socio-economic circumstances, where the City of Whitehorse hosts a fully capable daycare capacity at levels found in larger, southern city centres, and in the smaller communities of Ross River and Watson Lake, family-related daycare is more prevalent. Certainly, in Yukon First Nation culture a significant percentage of the population of the communities rely on family members; therefore family-related daycare is more readily available than might be thought based solely on population. Independently operated daycare is expected to be currently limited in the communities; however, as in any other community experiencing economic growth, additional daycare capacity, if required, will emerge in response to market demand. If BMC becomes aware that lack of available daycare becomes a disincentive to employment at the Project, it will engage with community and First Nation input to develop appropriate solutions (i.e. consider supporting the training of individuals for daycare, provide financial support for staffing and space for daycares, support childcare programs). However, it should not be assumed that single parent families without strong family support will see the proposed mine as an employer of choice. BMC expects that many parents in such circumstances may not wish to work away from their family at all.

During community discussions in 2024 it was determined that day care capacity is available in both Watson Lake and Faro.

12 CLOSURE AND POST-MINING LAND USE

12.1 WORKFORCE PLANNING AND TRANSITIONING FOR CLOSURE

The key to successful mine closure will be clear communication with the workforce, so the planned Project phases are well understood as early as possible. In this way BMC and its current and future employees can and will make decisions on employment in full knowledge of both the risks and consequences. During the last one to two years of Project Operations, mining activity will reduce steadily as follows:

- In the underground mine, mine development will reduce and then cease, and only production stoping will continue. During this period, some personnel will naturally cease working for the company of their own accord and take up positions elsewhere. This is typical in the last year or two of mining and non-mining projects. The company will regularly assess its employment needs and as underground mine development reduces; mine development personnel will be redeployed into the mine production crews (where their skills are readily transferrable) to fill ongoing vacancies. During this period, the company will commence removal of fixed equipment from mined out areas and this will be undertaken by former development personnel. The company acknowledges that at times it will be slightly over or understaffed and has accommodated this in its schedules and financial calculations.
- In the open pit, as the pit gets deeper and work areas become restricted, the mining (drill/blast/excavate) sequence will be modified, waste to ore strip ratios will be reduced and activity in the pit will gradually reduce. At the same time, reclamation activity on the waste rock storage areas will increase and when mining activity is low in the open pit, personnel will be redeployed to conduct reclamation earthworks. In this way it is expected that overall activity for mining personnel will be kept relatively constant. Required reclamation training will be provided to employees in advance of the end of mining.
- At the end of the open pit mining period, specialist drill and blast personnel will be offered employment termination packages. Most other earthmoving personnel will move to fulltime roles in reclamation. This work shall continue for 1 to 2 years.
- From a mineral processing perspective, the company will continue at full processing production until late in the final year of Operations at which point the company will most likely transition to an operating cycle that fits with the remnant production capacity of the mine. In the company's experience, it is likely that personnel will commence to find other permanent roles from approximately 12 months prior to this period. The company will therefore need to adopt a strategy to deal with a steadily reducing workforce during this period. The company may need to modify its processing activity slightly earlier than expected if employee numbers dictate.
- At some point during the Active Closure period the company will offer voluntary redundancy packages to general employees. Employees with critical skills that are required for the Active, Transition and Post-Closure periods will not be offered termination packages. In this way the company expects to reduce employees on site to those numbers required for the next Project

stage. Given that the Transition and Post-Closure period runs for 23 years beyond Active Closure (i.e. starting in approximately 13-14 years from Construction) any employment predictions beyond that point will have limited accuracy. The company estimates that the natural attrition of employees during this time will largely balance the declining need for personnel.

The company will take into account the unique circumstances of every employee and will give retention preference to locally based employees. This will not preclude locally based employees from requesting a termination package if they wish to take advantage of another employment opportunity elsewhere.

Redundancy packages typically include the following elements:

- Relocation/transfers into other roles within the company (for example into exploration or environmental monitoring roles).
- Retention bonus so that employees finish their employment at a time that suits the company's operational needs.
- Retraining allowances to help the employees upskill to fit their future desired roles.
- Employment outsourcing support, where the company pays for third party support for new employment roles. The degree of this support will vary depending upon the level of employment activity that is prevalent in the Yukon and Canada at the time, but typically these packages are provided for 3 to 12 months. Outsourcing support typically includes assistance with preparing resumes, letters of application, career counselling and advice, sourcing of opportunities and coaching for interviews. It can be as comprehensive as the employee needs.
- References will be provided for all employees.
- Termination redundancy payments will vary depending upon circumstances but typically these payments will vary from 1 to 6 months of the average annual wage of the employee; and Employee Assistance Programs (EAP) to provide counselling and emotional support on an as-required basis for both employees and their immediate family members for a period of 3 to 12 months after closure of the Project. The EAP is designed to help employees to either obtain other employment in the same field or to prepare for and subsequently obtain employment in a different field if that is their wish.

12.2 UNPLANNED CLOSURE

In the event of an unplanned closure, BMC will give as much advance notice as practicable so that employees will know well in advance that the closure will be taking place and can start looking for new employment. The period from a decision to close to cessation of activity to only Care & Maintenance would be no less than 6 months and could be as high as 18 months under some circumstances. Recruitment for Care and Maintenance positions will be done with preference for former qualified mine employees by the body overseeing Care and Maintenance.

During the operations of the Project, BMC will implement a health and well-being program for all mine employees. This program (in part) will include training programs (e.g., trades, apprenticeships, management) to promote progression in employee careers but also to promote transferable skills to enable employees to be more employable, which will facilitate any transitions from working on the Project to another mine or even a different industry. Also, as part of the health and well-being program, all BMC employees will have the opportunity to take financial management and budgeting training (in part through online training) which will teach employees about the importance of saving as well as debt avoidance.

In addition, if an unplanned closure is required, BMC will help all employees prepare resumes, practice interviews and facilitate in the job search, with the intent that employees would transition quickly to new employment.

BMC will maintain in trust a transition fund with sufficient funds to ensure, in the event of an unscheduled closure:

- a) Funds for education and retraining;
- b) Maintenance of the employee assistance program (EAP); and
- c) Payment of back wages and severance for affected employees from Watson Lake and Ross River employed by the Project at time of closure. The amount of funds and their administration shall be conducted by a suitable party.

The administrator shall have a local representative in either Ross River or Watson Lake to aid in ensuring the fund meets its objectives.

12.3 POST-MINING LAND USE

Consultation and Engagement related to Reclamation and Closure is described in the Reclamation and Closure Plan (BMC, 2026a). The closure objective for the Project is: *“To return the Project site and affected areas to viable and, wherever practicable, self-sustaining ecosystems that are compatible with a healthy environment and with Traditional Land Use (TLU) activities.”* The Reclamation and Closure Plan commits BMC to ongoing closure planning engagement with Kaska and stakeholders, which may result in updates to the Closure Plan including post-mining land use.

One of RRDC’s Elders Conditions for Consent was for “mine infrastructure to be given to RRDC for tourism, education etc. purposes.” BMC has agreed to this in principle but requires more detailed discussions on the specific infrastructure and it is anticipated that this will be addressed during the modernized SEPA negotiations.

13 CANADIAN AND INTERNATIONAL REPORTING STANDARDS

Commitments to ESG Standards will be made following receipt of key Project licences and Project approval by the Company's Board of Directors.

14 WORKER AND COMMUNITY HEALTH AND SAFETY

The mitigations and management strategies presented in this chapter are intended to reduce or eliminate potential negative impacts on worker and public safety within the entire population of the workforce and communities. However, there is a focus (particularly Section 14.5.4 – Workplace Conduct) on the safety and security of Indigenous women, girls, and 2SLGBTQIA (two-Spirit, Lesbian, Gay, Bisexual, Transgender, Queer/Questioning, Intersex, and Asexual people). These specific mitigations are aligned with both the National Inquiry into Missing and Murdered Indigenous Women and Girls (MMIWG, 2019) and Yukon Government’s Missing and Murdered Indigenous Women, Girls and Two-spirit+ people (MMIWG2S+ Strategy) (YG, 2022).

14.1 INDIVIDUAL HEALTH

To help employees and their families maintain good health, BMC will negotiate on behalf of all employees for favorable arrangements with suppliers of life and property insurance to significantly reduce the costs of these products and offer a dental and health plan for employees. BMC will also bring in a hearing test contractor for employees.

BMC will also support the provision of information regarding health and wellness education programs through its Employee Assistance Program (EAP). The EAP program will be available to employees and their dependents (i.e. spouses and children). An example of the program including how to access the EAP, and frequently asked questions is included in Appendix F. While the example provided is from Sun Life, BMC will evaluate specific insurers and programs prior to Construction. The EAP will ensure that access to counselling services is available all employees and their spouses and children. All BMC employees will be provided mental health awareness training and BMC management is committed to mental health awareness.

The EAP support will be offered on a confidential basis and is subject to normal patient – doctor privilege. However, the company will be advised monthly on a nonspecific basis, as to the quantity, general nature and cost of the support that has been provided by the EAP to the employees and contractors. Experience on other mining projects has shown that significant changes in the level of demand and the type of demand for support services is a useful indicator as to the effectiveness or otherwise of company policies and management tools. If required these tools can then be modified to provide better support for employees and thereby better outcomes.

The company currently has in place a Mentor program for First Nation personnel employed at the Project. The initial purpose of this program was to support potential First Nations employees to become ‘job ready’ and to support them in successfully applying for, preparing for and maintaining employment on the Project site. However, this program will be expanded to become a more general support program for all site personnel. This program will act as a useful personnel management feedback loop for the company since the Mentor is often the first point of contact for local personnel experiencing difficulties at work or at home. Where “at risk” circumstances are identified the opportunity for corrective actions by the company exists and can be acted upon such as engaging with the EAP program. The mentor will have the capacity to propose to the Senior Site executive

mitigation measures based on his/her/their special knowledge of the matter at issue, the person and the immediate family/social situation.

14.2 FAMILY STRESS

BMC will mitigate possible family stress of its employees through:

- Extensive pre-hire screening of employees to gauge their suitability for shift work and to help educate them on its potential effects;
- Point of hire being within the Yukon to reduce travel time of employees to get back to their families;
- Provide assistance and education through its EAP to all employees and their eligible dependents including (but not limited to):
 - Stress management/coping techniques;
 - Financial management training;
 - Drug and alcohol counselling (including time off for employees who need treatment);
 - Marriage counselling;
 - Healthy living education (i.e., benefits of diet and exercise);
 - Mental health support; and
 - Legal services.
- BMC will host annual family days at the mine site to show spouses and children of the employees the mine and associated facilities (BMC's experience is that families are more comfortable with their spouses being away if they have seen the site and facilities first hand);
- Communications at the site will be via microwave (to maximize bandwidth) and individual connections in each room to ensure that employees can easily communicate via Skype/Facetime etc. with their spouses and children in the privacy of their room rather than in a communal area. BMC's experience is that regular communication from the absent family member is a substantial mitigation of family stress through absence and "face-time" is the best communication;
- BMC will provide recreational facilities (including an exercise facility) at the site and all mealtimes will have healthy food options, to promote health and well-being of employees while on-shift (with the intent that this would also extend to off-shift healthy living);
- Training of employees (e.g., trades, apprenticeships, management) to promote progression in their careers (which may enhance job satisfaction);
- Bereavement leave will be available to all employees;
- The 2 week in and 1 week out shift rotations, when combined with the four weeks of annual vacation time available after the first year of employment, will allow employees to take one month off twice per year;

- BMC will ensure that on-site employees have the ability to utilize the EAP services available (i.e. ensure that a private phone line or internet is available to discretely reach EAP services).
- BMC will inform all employees that their eligible dependents have access to the Employee Assistance Plan (EAP).

To address and mitigate impacts to employees who are or become victims of domestic abuse, BMC will create a policy that:

- outlines clear procedures for the workplace to work with affected employees and provide appropriate resources and support;
- plans for and addresses safety concerns that affected employees may have while at work to ensure all workers are safe from threats of domestic violence; and
- includes a personal safety plan for employees suffering from domestic violence.

BMC intends to develop this policy in collaboration with the SEMP working group (see Section 3.7.3).

BMC will have education and resources in place to address and help prevent sexual violence and suicide.

BMC has stated that its intended employment point will be local communities within the Yukon including Ross River, Faro, Watson Lake and Whitehorse. The company will seek to avoid wherever practicable, employment of personnel outside the Yukon on long fly-in/fly-out commutes. The practical effect of this will be that company supervisors and managers will be embedded into the local community and will therefore be more aware of local issues and social stresses that may lead to unintended social outcomes either for the community or for individual family groups within the community. Our experience is that social networking will provide a level of information flow that might not be available in workplaces that operate in a predominantly longer distance fly-in/fly-out structure.

14.3 REDUCING ALCOHOL AND DRUG USE

The site and camp will be dry through all phases of the Project; no alcohol or recreational drugs will be permitted.

BMC will follow the industry standard and institute mandatory drug and alcohol testing for potential new employees and random testing thereafter (see BMC's Fitness for Work Policy in Appendix A).

The company will also provide general training to site supervisors and managers that will enable them to be better prepared to recognize the signs and symptoms of employees that may be either at risk of, or be suffering from, substance use either directly or indirectly. Once identified, support mechanisms can be initiated.

Historically, BMC has had a strong relationship with Ross River Dena Council as the lead Kaska community for the Project and is seeking to continue to grow that relationship as well as those with Liard First Nation and the local governments of Watson Lake, Faro and Whitehorse. These

relationships will be supported by regular meetings between company representatives and government bodies (see Section 3.7.3). It is anticipated that unintended social and community issues including drug and alcohol use will be a routine topic in those discussions and will be a valuable source of feedback information for the company.

14.4 PUBLIC HEALTH AND SAFETY (INCREASED TRAFFIC, HAZARDOUS MATERIAL TRANSPORT, WASTE DISPOSAL)

To ensure public health is protected, BMC will follow the *Public Health and Safety Act* (YG, 2002b) and all associated regulations concerning potable water, food safety, and the disposal of sewage and garbage under the oversight of the Environmental Health Services Branch of YG.

The impacts of the increased truck transportation due to concentrate haulage and other vehicles will be mitigated in part through the Traffic Management Plan. This plan includes BMC's commitment to contracting a qualified trucking firm that will:

- Use only experienced, professional drivers;
- Equip all trucks with two-way radio communications; and
- Implement design, safety and operating procedures proven by similar trucking systems utilized in Yukon and Canada.

Risks from hazardous materials and from spills will be mitigated through the application of the Hazardous Materials Management Plan and Spill Contingency Plan.

All long-haul trucking operations will be operated in accordance with *Yukon Occupational Health and Safety Regulations* in Yukon and in British Columbia the *BC Motor Vehicle Act* and other pertinent health and safety statutes and regulations regarding maximum allowable driver working durations.

Both the Yukon and BC also have modern statutes and regulations governing the transportation of hazardous goods on public roadways, designed to protect public safety. Past experience in Yukon has shown that the addition of regular traffic by professional drivers equipped with basic first aid supplies and reliable communication capabilities on remote highways has proven to be a welcome safety feature for the public. Concentrate haul and supply trucks have in many instances played pivotal roles in providing critically needed and otherwise unavailable timely roadside assistance in remote areas such as Yukon.

Once off the property and onto the Robert Campbell Highway and other highways, traffic out of and into the site will operate using existing roadways and traffic corridors, which include identified industrial trucking routes through municipalities. The largest category of vehicular traffic will be Project-specific contract concentrate haul trucks, which will be appropriately lit including strobe lights, as well as high intensity driving lights for the long stretches of unlit highway during winter operations. With the exception of Watson Lake, the municipalities through which the concentrate haul trucks will travel do not intersect school zones. Heavy truck haul routes have been designed to eliminate the intersection of industrial traffic and school zones. During community consultations and in meetings with the Mayor and Town Council of Watson Lake regarding the Project, this issue was

identified. Under the current road arrangement, the truck route through Watson Lake runs in front of the school. In this section of the haul route, trucks will obey the school zone speed limit of 30 kilometres per hour. Any school bus zones that occur along the truck route will be identified as part of a driver orientation and training program prior to the first trip of any new drivers. New driver orientation sessions will also include briefings on known high incidence areas of wildlife crossings along the route, which will be updated with new sightings as they occur as part of the Wildlife Management Plan.

Additional detailed measures on how the traffic will be managed are included in the Traffic Management Plan.

14.5 WORKPLACE HEALTH AND SAFETY

The health and safety of those working on the Project is a top priority for BMC. The company will rigorously follow all applicable safety laws and regulations in all aspects of its operations. BMC will also implement its Occupational Health and Safety Policy (Appendix A). Mitigations and management related to workplace health and safety is largely included in the Emergency Response and Health & Safety Plan. To avoid duplication within management plans, the following describes those measures that are not already included in the Emergency Response and Health & Safety Plan.

14.5.1 Site Medical Services

BMC will employ a full time Occupational Health and Safety (OHS) and Emergency team on site that will consist of the following roles;

- a) OHS Manager
- b) Site Nurse
- c) Site Paramedic
- d) Site Mines Rescue/Emergency Coordinator

All of these staff will hold advanced first-aid attendant qualifications (as defined in the Regulations). The site nurse and site paramedic will also hold appropriate qualifications in their field (and be licensed to practice in Yukon), however their role will be to manage the site's occupational health and safety requirements, rather than practice as a nurse or paramedic. These staff will be provided with occupational health training and health screening training such as hearing tests, fit testing of respirators, blood lead level testing, and other occupational health requirements as appropriate.

All of these staff will be day shift only and it is expected that two out of four staff will be on site at all times. Temporary replacement staff will be engaged to maintain coverage due to annual leave. In addition to this, all shift supervisors will be required to hold advanced first-aid attendant qualifications and all management will be required to hold standard first-aid attendant qualifications.

The site nurse and site paramedic on-site will be trained in Mental Health First Aid and/or will have formal mental health training to provide short-term or crisis support at the mine site, referrals to other mental wellness supports or navigation to other systems.

The number of first-aid attendants at the Project will meet or exceed the requirements of Schedule 2 of the Regulations. All employees will be required to have received first aid training to a level of at least the equivalent of a first aid attendant, as defined in the Yukon *Workplace Health and Safety Regulations* (YG, 2022).

The primary first-aid room for the Project shall be located adjacent to the site administration offices. A secondary first-aid room shall be located at the accommodation camp. Both first-aid rooms shall be equipped in accordance with Schedule 3 of YG (2022). A risk assessment has been completed and, in addition to the requirements of Schedule 3 of YG (2022), amyl nitrite (cyanide poisoning antidote) and pain relief are planned to be held on site for management of site first aid requirements. Automated External Defibrillators will also be available at each first aid room and in multiple other locations. There will be a dedicated dressing station at each work area; the Process Plant and Administration complex, Open Pit and Underground Workshops and Camp. Additional details can be found in the Emergency Response and Health and Safety Plan (BMC, 2026b).

The operation of the mine site shall not be reliant on Medical Centers at Faro, Ross River, or Watson Lake. Use of the Whitehorse Hospital is only expected in the case of emergency or for specialist services normally provided only by hospitals.

14.5.2 Blasting

During Operations open pit blasting will occur approximately four times a week or on average once every two days. The blast will consist of a single blast where all connected holes will be initiated and exploded in sequence and will likely take a maximum of 3 to 5 seconds to be completed after initiation. The blasts will occur at shift change at the end of Day Shift prior to Night Shift starting work, nominally between 4 and 6 pm.

On the day of the blast all personnel will be advised at the beginning of the shift when and where the blast will occur and the appropriate procedures to follow. Clearing of all personnel from the working area and surrounding areas, sounding of the appropriate warning sirens and announcements will occur prior to the blast. Due to the disruption to production activities, blasting during the shift will be kept to an absolute minimum though on occasion it may be necessary, for safety reasons, to reprime and blast misfires on shift. This is not expected to occur regularly and generally the misfire will be barricaded and blasted with the next scheduled blast.

Underground blasting will similarly occur at shift change; however, it will occur more frequently with blasting possible twice a day, once at the end of Day Shift and again at the end of Night Shift. The amount of explosives initiated with each blast will be substantially less than the amount used with the open pit blasts and blasting noise, after initial decline development, will be contained within the underground workings.

Due to the proposed blasting schedule being at shift change there will be no adverse sleep-related effects for employees. Day Shift employees will be coming off shift while Night Shift employees will be preparing to go on shift and there will be no personnel attempting to sleep at the time of the blasts.

14.5.3 Water Treatment

A new water well(s) will be installed and constructed per the Canadian Well Drillers Guidelines and will be required to meet the Canadian Drinking Water Guidelines. All water treatment objectives must have Environmental Health Services review and approval.

It is anticipated that monitoring, filtration and disinfection of drinking water sources for the life of the Project will be consistent with the procedures that have been successfully used at the site since 2015.

The drinking water filtration and disinfection (i.e., UV units) equipment is and will continue to be National Sanitation Foundation/American National Standards Institute certified and is/will be regularly tested and serviced according to manufacturer's guidelines. Note this system includes a solenoid shutoff valve that is triggered by malfunction of the UV sterilizer unit.

Drinking water is and will continue to be sampled monthly and sent to an International Organization for Standardization/International Electrotechnical Commission 17025 accredited laboratory for testing of all chemical and physical parameters listed in Schedule B of the Drinking Water Regulations (YG, 2007) as well as the Guidelines for Canadian Drinking Water Quality (Health Canada, 2014). Samples will also be submitted to Environmental Health Services for bacteriological testing monthly, or at a schedule determined by a Health Officer. BMC will monitor drinking water quality more frequently if required. The results of the water testing are and will continue to be posted in the kitchen, showers and washrooms monthly, and as required when more frequent testing is conducted.

In the event that the water does meet the drinking water regulations or guidelines, signs will be posted indicating the water is not potable and not to drink the water. BMC will work with Environmental Health Services to determine the cause and develop a solution. Once the issue is resolved the notices will be removed, and all staff and contractors will resume utilizing the water for drinking.

In the unlikely event that an alternative safe supply of water is needed:

- BMC can install an additional groundwater well at the site, which would include water filtration, disinfection and monitoring of the groundwater (per the commitments above that it will be installed and constructed per the Canadian Well Drillers Guidelines and will be required to meet the Canadian Drinking Water Guidelines; and
- BMC is currently planning for two potable water treatment plants on site. If the camp water supply fails, then water from the other unit can be trucked to the camp until it is repaired.

14.5.4 Workplace Conduct

The following will be developed prior to construction and will be implemented throughout all Project phases:

- Develop mandatory, regular harassment prevention training in consultation with a qualified provider, to be delivered to all BMC employees, contractors and consultants working at the site;
- Ensure that Human Resources staff complete training to enable them to effectively support employees who disclose workplace harassment. In order to increase reporting of sexual harassment and assault, Human Resources staff shall provide all new staff with information about ways in which they may best record and provide evidence of harassment or bullying and what happens after they make a disclosure of workplace harassment and how they will be protected from reprisals;
- Modify its existing Mentor program for Yukon First Nations employees to:
 - ensure that women have access to a mentor or supervisor who regularly checks in to address any negative experiences related to the male-dominated work environment, and who pays special attention to potential cases of abuse;
 - develop a formal feedback process to ensure that enquiries are regularly made to First Nations employees to ensure that they are able to voice concerns and have addressed any negative experiences; and
 - involve both LFN and RRDC in further developing this Program to ensure that it meets the needs of First Nation employees.
- In consultation with a qualified expert and both LFN and RRDC, develop gender appropriate and gender- and sexuality-specific policies and processes which promote a safe, respectful and inclusive environment for women and gender and sexual minorities;
- Develop, with a qualified expert, an Anti-Harassment and Bullying Policy that outlines processes and actions to address any harassment or bullying which may take place within the Project's scope;
- Ensure that the on-site First Aid Technician or Emergency Medical Technician is trained in Mental Health First Aid and/or has formal mental health training to provide short-term or crisis support at the mine site, referrals to other mental wellness supports or navigation to other systems;
- Develop standards for behavior at work and codes of conduct against sexual harassment and gender-based violence on the job site and in the broader community, including standards/codes of conduct in relation to the sex trade, and shall distribute education and awareness campaign materials on gender- based violence; and

- Workplace conduct will be part of the job orientation. The Mentor will follow-up with female employees after the orientation to ensure they are fully aware of the conduct requirements and processes for reporting non-compliance.

14.5.4.1 Camp requirements

Some members of the community are concerned about camp safety, particularly as it relates to female and gender diverse employees and contractors. BMC will implement the following measures:

- A section of the camp will be dedicated to only women, which will have its own female bathrooms; some of these will be single-occupancy with floor to ceiling stall doors.
- A section of the camp will have all gender bathrooms; these will also be single-occupancy (with floor to ceiling stall doors) and will be considered "Universal" or "All-Gender" so individuals do not have to choose between binary options.
- Each room will be for one person only; all rooms will have lockable doors; and

Posters with QR-Code will be posted to help workers confidentially whistle blow issues and concerns that may arise.

15 EVALUATION, ADAPTIVE MANAGEMENT AND REVISIONS

This Chapter describes how the socio-economic conditions will be monitored, reported and adaptively managed throughout the life of the Project. The results of monitoring programs and adaptive management initiatives will be included in annual reporting for the QML. Based upon the annual report, or as new information is gained through ongoing engagement, monitoring activities, and feedback, updates to this SEMP may be required. In addition to this, updates may be initiated at the request of First Nations, or under direction from Mineral Resources Branch.

15.1 SOCIO-ECONOMIC MONITORING

BMC will conduct socio-economic monitoring to:

- Assess the effectiveness of the measures to mitigate negative Project effects and/or enhance Project benefits (where the monitoring outcomes can be linked to the Project); and
- Identify unexpected socio-economic effects or outcomes of the Project.

The monitoring programs have been divided into the following four Socio-economic Categories:

1. Employment, Training and Economic Benefits;
2. Traditional Land Use and Cultural Heritage;
3. Community Vitality; and
4. Worker and Community Health and Safety.

For each Socio-economic Category the objectives of the monitoring are presented followed by tables that describe the monitoring measures, data sources and reporting frequencies.

15.1.1 Employment, Training and Economic Benefits

The objectives of the Employment, Training and Economic Benefits monitoring include tracking:

- Economic growth;
- Employment outcomes;
- Education and training outcomes; and
- Economic benefits to governments.

The monitoring that will be implemented to achieve these objectives is presented in Table 15-1.

Table 15-1: Employment, Training and Economic Benefits Monitoring

Subcomponent	Potential Effect	Monitoring Measure	Data Source	Reporting Frequency
Economic growth	The Project will provide economic growth to Yukon. The Project will provide economic growth to the communities.	1. Yukon GDP 2. Employment, unemployment, and participation rates of local communities. 3. Income data	1, 2. Yukon Bureau of Statistics, Yukon Community Statistics and Statistics Canada 3. BMC data and Yukon Bureau of Statistics	Annual or at frequency of 3 rd party data collection
Diverse and stable economy — discouraging boom and bust	Creation of boom-and-bust cycle through relatively short Project life, particularly in small communities.	1. Employment by industry. 2. Population fluctuations over time.	1, 2. Census (Statistics Canada), National Household Survey (Statistics Canada), and Yukon Bureau of Statistics	Annual
Employment	The Project will provide Kaska citizens and other Yukon residents employment.	1. Total full-time equivalent (FTE) employees 2. Contractor FTEs 3. Local Community FTEs 4. Kaska FTEs 5. Female FTEs 6. Description and level of support towards Kaska recruitment and retention initiatives 7. Kaska employee departures, turnover rate, and reasons for departure	1-7. BMC data	Annual
Employability — education, training, and experience	The Project has the potential to improve education levels. The Project has the potential to offer training to Kaska and Yukon employees. The Project has the potential to offer work experience to Kaska and Yukon residents.	1. Description and level of support towards school-based initiatives 2. Local Community graduation rates 3. Work ready programs (participants, graduates, and success rate) 4. Employee training hours (separated by Kaska and non-Kaska) and training spending 5. Apprentices (separated by Kaska and non-Kaska), graduates, advancement program participation 6. Employee advancement (separated by Kaska and non-Kaska) promotions and rate 7. Employment by skill level (separated by Kaska and non-Kaska)	1. BMC data 2. Data from Local Community schools 3. Data from Local Community colleges, University and industry sponsored program leads. 4-7. BMC data	Annual
Broad participation in economic development	Potential to continue the direct beneficial effect through the Project providing jobs and business opportunities to the entire cross-section of Yukon society.	1. First Nations and non-First Nations participation and employment rates 2. Women's participation and employment rates	1, 2. Census (Statistics Canada), National Household Survey (Statistics Canada)	Annual

Subcomponent	Potential Effect	Monitoring Measure	Data Source	Reporting Frequency
Business opportunities	Potential to continue the direct beneficial effect through the Project providing business opportunities to Kaska and Yukon businesses.	1. Contracting commitments to Kaska firms 2. Contracting commitments to Kaska firms (proportion of contracts) 3. Contracts tendered exclusively to Kaska Firms 4. Number of Kaska firms to which contracts have been awarded 5. All of the above for Yukon firms 6. Kaska business development initiatives (implementation of SEPA commitments)	1-6. BMC data	Annual
Government revenues	Potential to continue the direct beneficial effect through the Project providing business opportunities to Kaska and Yukon businesses.	1. Municipal taxes 2. Yukon and federal income taxes 3. Fuel tax and carbon tax paid to Yukon Government and or Federal Government 4. Royalty payments to Yukon and/or Federal Government	1. Town of Watson Lake, Town of Faro, and City of Whitehorse data 2-4. BMC data	Annual

15.1.2 Traditional Land Use and Cultural Heritage

The objectives of the Traditional Land Use and Cultural Heritage monitoring include tracking:

- Land and resource use; and
- Maintenance of language, culture and traditional knowledge.

The monitoring that will be implemented to achieve this objective is presented in Table 15-2.

Table 15-2: Traditional Land Use and Cultural Heritage Monitoring

Subcomponent	Potential Effect	Monitoring Measure	Data Source	Reporting Frequency
Traditional economic and land use activities — hunting, fishing, trapping, food gathering etc.	Potentially reduced opportunity to pursue traditional economic activities. Easier access to area for hunting and fishing; reduced wildlife stocks. Increased traffic and industrial activity in the region may act to drive wildlife away. Disruption and loss of access.	1. Time spent by FN for traditional activities 2. Number of wildlife harvested 3. Local wildlife populations 4. Inventory/status of access routes 5. Numbers of staff utilizing unpaid leave provisions	1. FN Community and Elders, 3rd party reports 2, 3. Yukon Harvest or other YG data 4, 5. BMC data	Annual
Gathering traditional medicine	Possible reduction in traditional medicine gathering and use due to rotation shift work and loss of gathering areas.	1. Time spent by First Nations collecting traditional medicine	1. FN Community and Elders, 3rd party reports	Annual

Subcomponent	Potential Effect	Monitoring Measure	Data Source	Reporting Frequency
Language preservation and restoration	First Nation employees have less time to use and help restore their languages.	1. Speakers of Aboriginal language	1. Census (Statistics Canada), National Household Survey (Statistics Canada), FN Elders, and external reports	Annual
Culture, Traditional knowledge and practice preservation and restoration	First Nation employees have less time to practice and restore traditional knowledge.	1. Keepers of traditional knowledge	1. FN Community and Elders, 3rd party reports	Annual

15.1.3 Community Vitality

The objectives of the Community Vitality monitoring will include tracking:

- Population growth;
- Employee living locations;
- Community health;
- Community infrastructure and services outcomes.
- The company's participation and contributions to community endeavours; and
- Infrastructure and services.

The monitoring that will be implemented to achieve this objective is presented in Table 15-3.

Table 15-3: Community Vitality Monitoring

Subcomponent	Potential Effect	Monitoring Measure	Data Source	Reporting Frequency
Population — number of children	The Project may attract new residents and their families to the Yukon. Increased population, and especially families with children is desired in Faro and Watson Lake.	1. Community population, growth pattern and number of children 2. School enrolment data 3. Number of Project employees moving into Local communities 4. Number of Project employees living outside of Yukon	1. Yukon Bureau of Statistics 2. Yukon Community Statistics 3, 4. BMC data	Annual
Healthy local business sector — reducing the cost of living	The Project has the potential to improve the health of the local business sector.	1. Number of businesses and employees 2. Cost of living differential	1, 2. Yukon Bureau of Statistics	Annual

Subcomponent	Potential Effect	Monitoring Measure	Data Source	Reporting Frequency
Reducing crime	The Project can potentially reduce crime through employment opportunities. But if increased incomes lead to increases in alcohol and drug use, then crime levels are likely to rise.	1. Local and Regional community crime data	1. Yukon Bureau of Statistics	Annual
Reducing discrimination and racism	The Project has the potential to reduce discrimination and racism.	1. Income differentials between First Nations and others	1. Yukon Bureau of Statistics; and National Household Survey (Statistics Canada)	Annual
Community events and volunteerism	The Project has the potential to beneficially affect community events through sponsorship.	1. Description of BMC sponsored community events and volunteerism	1. BMC data	Annual
Recreational facilities and opportunities	The Project has the potential to beneficially affect recreation facilities and opportunities through donations and sponsorship	1. Description of BMC donations and sponsorships	1. BMC data	Annual
Transportation infrastructure — roads and airports	Potential beneficial effect on the Robert Campbell Highway through highway improvements making it easier for people to travel between the communities of Ross River and Watson Lake.	1. Traffic count data 2. Road conditions	1. BMC may have to monitor and provide own data 2. Yukon Highways and Public Works (not verified)	Annual
Municipal services — water, sewer, solid waste	If significant numbers of employees relocate, small communities' services may be stressed. Potential adverse effect if the Project uses municipal solid waste facilities.	2. Municipal waste infrastructure capacity and amount processed	3. Municipality data	Annual
Healthcare services	If significant numbers of employees relocate, small communities' healthcare services may be stressed (outside the Project).	3. Increase in healthcare visits to Nursing Stations and Hospital	4. Yukon Health and Social Services data	Annual
Police services	If significant numbers of employees relocate, small communities' police services may be stressed (outside the Project).	4. Local and Regional community crime data	5. Yukon Bureau of Statistics	Annual

Subcomponent	Potential Effect	Monitoring Measure	Data Source	Reporting Frequency
Childcare	If significant numbers of employees relocate, small communities' childcare services may be stressed.	5. Childcare facilities and spaces available	6. Yukon.ca, Education and Schools	Annual

15.1.4 Worker Health and Community and Safety

The objectives of the Worker and Community Health and Safety monitoring include tracking:

- Use of the EAP program;
- Public health and safety; and
- Workplace health and safety.

The monitoring that will be implemented to achieve these objectives is presented in Table 15-4 Table 15-3.

Table 15-4: Worker and Community Health and Safety Monitoring

Subcomponent	Potential Effect	1. Monitoring Measure	1. Data Source	Reporting Frequency
Individual health	The Project has the potential to provide a beneficial effect by offering steady and well-paid employment, and education and skills development.	2. Selected Health Survey statistics	2. Canadian Community Health Survey (Statistics Canada)	Annual
Family stress	The combination of a sudden increase in income and the absence of the employed spouse/parent during each shift rotation can have adverse effects on family health and well-being.	1. Description, percentage of people divorced or separated 2. Employee Assistance Program uptake	3. Yukon Bureau of Statistics 4. BMC data	Annual
Reducing alcohol and drug use	Substantial increases in income can lead to increases in drug and alcohol use as these substances become relatively more affordable.	1. Alcohol sales data 2. Alcohol consumption rates 3. Employee Assistance Program uptake	1. Yukon Bureau of Statistics 2. Canadian Centre on Substance Use and Addiction 3. BMC data	Annual
Public health and safety — increased traffic, hazardous material transport	Significant increases in highway traffic could lead to violations (speeding etc.) and accidents. The possibility of a spill or accident that will have a potential public health or safety effect along with an adverse environmental effect. Possible improper disposal of sewage and garbage.	1. Traffic data 2. Monitor road use, adjustments as required 3. Risk assessments, incident reports and/or external reports. 4. Incident reports and/or external orders	1. BMC may have to monitor and provide own data. 2, 4. BMC and/or external data	Annual

Subcomponent	Potential Effect	1. Monitoring Measure	1. Data Source	Reporting Frequency
Workplace health and safety	Potential adverse effects of workplace accidents.	1. Number of safety incidents, all types 2. Incident type, causes, and frequency/rate. 3. Lost time 4. Preventive/recurrence measures implemented 5. Compare with industry	1-4. BMC data 5. Yukon Workers' Safety & Compensation Board (YWSCB) and other Provincial/Territorial data	Annual

15.2 REPORTING

15.2.1 Socio-Economic Monitoring Reporting

Data from the monitoring programs will be presented in textual, graphical, or tabular formats, with a source identified for each. Where appropriate, data 'trends' may also be described for the monitoring measures assessed in the report. These trends (e.g. pre-development, post-development, and since the previous year) will help demonstrate whether the monitoring measure has exhibited change and will describe the direction of that change. In cases where a particular monitoring measure is unavailable or not quantifiable, these topics will continue to be tracked. In these cases, qualitative information may be presented in the annual report that provides insights into the topic(s) being monitored. This could include statements made by First Nations, Organizations or Community members at engagement activities and events pertaining to the Project, or statements made by working group members (see Section 3.7.3).

Available data will be analyzed and discussed in the context of potential Project interactions with the topics and/or monitoring measures. This analysis may help ascertain the accuracy of socio-economic effect predictions contained in the Project Proposal, effectiveness of mitigations or address compliance matters associated with the Project Decision Document or QML. For example, residual effects may be assessed against some of the parameters predicted for them in the Project Proposal, including direction (e.g. beneficial, adverse) and where appropriate, magnitude (e.g. where quantitative metrics were provided in the Project Proposal).

Likewise, this analysis may include discussion on relevant mitigation measures. It may also identify areas where BMC's existing socio-economic mitigation and management programs are not functioning as anticipated, or areas for potential performance improvement.

In some cases, long-term data and monitoring may be necessary before Project Proposal predictions can be verified. In others, direct correlations between the Project and data trends may be unidentifiable or unclear. The process of socio-economic monitoring may require many years of data to effectively discern trends and causality. Even then, various factors (including non-Project ones) may influence causality, and these may not be easy to individually measure or confirm. BMC's monitoring programs are not intended to fully describe the causes of every socio-economic change that is reported. Rather, the programs are primarily intended to confirm whether predicted benefits

are being delivered and to identify potential areas of socio-economic concern; once identified, these areas may benefit from additional examination or a management response. More generally, successful socio-economic monitoring for the Project will require appropriate long-term data, the regular input of First Nations, Organizations or Community members, and a focus on continuous improvement.

15.2.2 Socio-economic Mitigation Measures Reporting

This SEMP presents numerous mitigations and commitments to mitigate the potential negative socio-economic Project effects and enhance Project benefits. As part of the socio-economic annual report BMC will report on the mitigations and enhancement measures that were implemented throughout the year.

15.3 ADAPTIVE MANAGEMENT

Adaptive management is a planned and systematic process for continuously improving environmental and socio-economic management practices and outcomes. Adaptive management provides flexibility to identify and implement new mitigation measures or to modify existing ones during the life of a project.

In the event that socio-economic concerns are identified through monitoring (e.g., observed results differ from those originally predicted, unanticipated effects are identified, mitigation measures are not functioning as anticipated), BMC will:

- Describe these issues in its Annual Report;
- Describe how these issues will be addressed or investigated further, if appropriate, in its Annual Report;
- Consult with the Socio-economic Working Group (see Section 3.7.3) if appropriate, on these issues and consider their feedback in any adaptive management measures being developed; and
- Report on the success of any actions taken in subsequent Annual Reports and/or adjust plans as necessary.

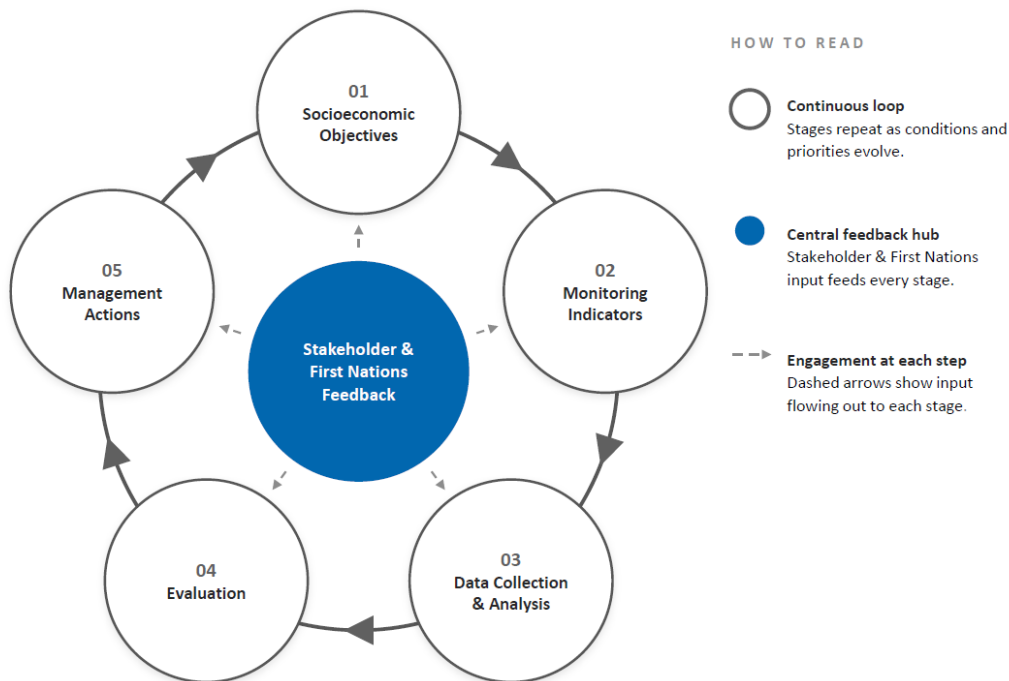
Quantitative adaptive management thresholds, triggers, and pre-defined adaptive management responses are not currently proposed; however, this SEMP may be updated to include these based on feedback from the Socio-economic Working Group. The adaptive management cycle is presented in Figure 15-1.

Figure 15-1: Adaptive Management Cycle

A continuous learning loop that turns monitoring into action — and adapts as conditions and community priorities change.

Closing the loop

Evaluation findings flow back into the objectives, so each cycle is informed by the last.



16 REFERENCES

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APPENDIX A: CORPORATE POLICIES

Communications Policy

BMC Minerals Ltd ("BMC" or the "Company") recognises that consistent, effective, and appropriate communications – both external and internal – are essential for the Company to achieve its aims, objectives, and policies. This policy outlines the principles for managing the Company Communications.

BMC's Board of Directors have established a Business Integrity Framework (BIF) which guides the way that the Company's business is conducted. The BIF is designed to ensure that the Company's activities meet the following key objectives;

- Comply with relevant legislation;
- Conduct all business activities ethically and with integrity;
- Enhance the Company's reputation.

The purpose of this Policy is to minimise the risk of a regulatory breach, adverse publicity, damage to the Company's reputation or damage to the relationships with business partners and the community by ensuring that all communications (internal and external) are consistent in their messaging and compliance with the Company's Position, Policies and Procedures.

This Policy has been developed to ensure that Employees and other parties who are working with and for the Group are aware of content restrictions and approved process required prior to publishing or releasing any Company branded communication or other communication which identifies the Group, it's Employees, business partners or community relationships.

The approved Group spokesperson is the Chief Executive Officer. Any material which is being used in presentations, handouts of fact sheets must be formally approved by the CEO or his/her designate prior to release.

Employees are not authorised to release, publish or represent the Company in the form of internal or external communications with any view or opinion about the Company without the expressed approval of the Chief Executive Officer. This approval is not required when the Employee is representing the Company in general internal conversation, when attending authorised networking events, providing information about the Company during the employment process or at workshops or training.

The Company does not approve or authorise the sharing, publishing or use of any material or communication which is discriminatory or disrespectful in nature.

Related Policies, Procedures, Guidelines and Local Protocols

- Community Relations Policy
- Company Management & Operating Policies and Procedures
- Digital Media Policy
- Equal Employment, Workplace Harassment & Anti-Discrimination Policy



Scott Donaldson

Chief Executive Officer Date: 31st July 2020

Company Management & Operating Policies and Procedures

BMC Minerals Ltd (“BMC” or the “Company”) has a primary objective to conduct all activities efficiently and safely, and in a manner that is aligned with the Company’s values of integrity and ethical conduct.

The Company recognises and endorses its responsibility to the public, statutory authorities, local community and its employees and shareholders. The Company’s Board has established a Business Integrity Framework (BIF) which guides the way that the business of the Company is conducted. Adoption of the BIF is designed to ensure that the Company’s activities meet the key objectives, which are;

- Comply with relevant legislation;
- Conduct all business activities ethically and with integrity;
- Develop a respectful, inclusive, and diverse workforce;
- Enhance the Company’s reputation.

The Company has established controls and a reporting framework to ensure that compliance is appropriately monitored, and associated risks are managed. The Company’s commitment to integrity and ethics applies to all directors, employees, contractors, consultants, business partners and third parties who work for, or with the Company, collectively All Stakeholders.

The Company has established major policies to assist us to deliver against the key outcomes; including in the areas of;

- Community Relations
- Environment
- Occupational Health & Safety
- People
- Indigenous Participation
- Equal Opportunity, Anti-Harassment and Discrimination
- Fitness for Work
- Financial and Commercial Management
- Communication
- Digital Media

The Company’s policies and standard operating procedures have been designed in support of the commitment that BMC has to local community groups, including traditional owners, other landowners, and local residents. They are designed to allow the Management team to be able to implement each policy and ensure that relevant stakeholders understand their obligations.

A handwritten signature in blue ink, appearing to read 'Scott Donaldson'.

Scott Donaldson
Chief Executive Officer Date: 31st July 2020

Digital Media Policy

BMC Minerals Ltd ("BMC" or the "Company") is mindful of its internal and external reputation and the impact that inappropriate use of digital communications can have on both the wellbeing of its employees and the reputation of the company and its business partners.

The Company also acknowledges that it has an obligation to protect itself, its employees and its business partners from harm while complying with all relevant equal opportunity, workplace harassment and discrimination legislation including all relevant Territorial, Provincial, State, and Federal Acts and Regulations as a minimum standard.

This Policy provides clarity on the acceptable use of digital content for social or other media platforms by employees and contractors when referring to the company, the company's products and services, its people, clients, competitors, and entities associated with the Company. The Policy clarifies the Company's expectations in relation to Internet, email and social media use by employees and contractors and ensures that the use of media communication platforms by any person associated with the Company does not cause damage to the company's reputation, programs or commercial interests or have the potential to create harm to our employees or business partners.

This policy applies to the creation and distribution of any images, text, audio, or otherwise distributable digital content and to any person associated with the company as an employee or contractor. It also applies in relation to any real or perceived public connections between the Company, its employees and the individual or entity engaging in digital media activity or the messaging suggested by that activity.

The Company's prescribed standards of communication for public statements, publications, use of media platforms (collectively called "Postings" or "Statements") incorporate the following key principles;

- Statements must be respectful in both content and delivery and must not be able to be interpreted (acting reasonably) as deliberately creating offence;
- Postings should not contain any Company proprietary information;
- Unless the Posting has been authorised in writing by the Company's CEO or designated Media Officer or in the case of reference to an individual, by that individual then;
 - Postings may not reference the Company or Company employees or activities;
 - Postings must not purport to be nor be able to be interpreted as being supported by or to be on behalf of the Company;
 - Photographs (or links to photographs) of Company personnel, operations, equipment, offices, and field sites are not to be uploaded;
- Postings must not be made that breach or have the potential to breach applicable laws in either the country in which the statements were made or the laws of any jurisdiction in which the Group conducts business or applicable United Nations Charter or similar;
- Posts must not incite racism, hate or be disrespectful of Indigenous or any other Peoples or culture.

Any breach of the Policy shall result in disciplinary action including termination of employment at the Company's sole discretion.

This policy shall be supported by appropriate standards, procedures and programs that are designed to facilitate a harmonious and respectful workplace and to protect the reputation of the Company and its business partners and the wellbeing of our employees.

Related Policies, Procedures, Guidelines and Local Protocols

- Communications Policy
- Equal Employment, Workplace Harassment & Anti-Discrimination Policy



Scott Donaldson
Chief Executive Officer Date: 31st July 2020

Employee Support Policy

BMC Minerals Ltd ("BMC" or the "Company") aims to provide a work environment which is safe, healthy, and supportive.

The Company recognises that the health, physical and mental wellbeing of our employees is important and a work environment which is engaged with, and supportive of its employees will benefit the individual, their families, and the wider community, as well as the Company.

Employee health and wellbeing will be supported through the following appropriately designed programs and initiatives;

- **Employee Assistance Program (EAP)**, which provides confidential counselling and psychological support to employees and approved family members.
- **Health and Wellbeing** initiatives and support programs that encourage healthy lifestyle choices and education programs including those in relation to drug and alcohol abuse and domestic violence.
- **Fit for Work** programs which include pre-employment medicals and assessments, induction, and active fatigue management processes.
- **Cultural Accommodation** for culturally important holidays, events, seasonal activities, and traditionally significant lifetime milestones.

The delivery of appropriate support to our people will enhance the achievement of our objectives and will ensure a mutually beneficial outcome for our employees, the broader community, the Company, and stakeholders.

A handwritten signature in blue ink, appearing to read "Scott Donaldson".

Scott Donaldson

Chief Executive Officer Date: 31st July 2020

Environment Policy

BMC Minerals Ltd ("BMC" or the "Company") recognises that there is a fundamental requirement to conduct the Company's activities in an environmentally responsible and ethical manner with due regard to the legacy of our actions.

In order to achieve our environmental objectives, the Company shall use an Environmental Management System with performance monitoring utilising various tools including inspection and formal project audit protocols.

The Company is committed to:

- Minimising the environmental footprint of our operations as far as is practicable;
- Establishing environmental programmes based upon risk assessments that set and review environmental targets and objectives;
- Developing and implementing sound management systems designed to minimise pollution whilst supporting the Company in meeting or exceeding the specified environmental targets and objectives for each project;
- Ensuring that local communities and stakeholders are considered when developing project systems;
- Ensuring that heritage sites are recognised, managed and protected as a fundamental part of our environmental culture;
- Integration of environmental issues into site inductions, training and ongoing workplace communication processes and procedures;
- Regularly evaluating and reviewing subcontractor and supplier environmental performance;
- Promoting the efficient use of energy and continually improving our processes to minimise waste so as to minimise waste and conserve natural resources;
- Encouraging continual improvement in environmental performance through establishment of planning, training, monitoring, inspection and reporting systems;
- Ensuring that exploration and mine closure and reclamation outcomes target the establishment of self-sustaining ecosystems.

All Employees have the shared responsibility to:

- Comply with project environmental conditions as communicated through the induction and ongoing communications;
- Support continual improvement of project environmental performance; and
- Communicate any environmental incidents and actively participate in rectification.

This policy shall be supported by appropriate standards, procedures and programmes that are designed to achieve the policy objectives.

A handwritten signature in blue ink, appearing to read 'Scott Donaldson'.

Scott Donaldson

Chief Executive Officer Date: 31st July 2020

Equal Employment, Workplace Harassment & Anti-Discrimination Policy

BMC Minerals Ltd ("BMC" or the "Company") is committed to ensuring all individuals are treated with dignity and respect by promoting and fostering a work environment which is free of all forms of discrimination, harassment, and bullying.

The Company and its employees will comply with all relevant equal opportunity, workplace harassment and discrimination legislation including all relevant Provincial and Federal Acts and Regulations as a minimum standard.

The purpose of this Policy is to promote adoption of the principles of;

- Mutual respect in the workplace;
- A workplace free from bullying, sexual and other harassment, and intimidation;
- Fairness;
- Anti-discrimination;
- Equal opportunity; and
- Merit based selection and career advancement.

Employment processes, career advancement opportunities and performance evaluations shall be merit based, without regard to other factors such as sex, marital status, pregnancy, parental status, age, race, culture, impairment, religion, political belief, social origin, lawful sexual activity, social preference and family responsibilities.

Managers and employees at all levels of the Company shall ensure they and the people around them do not engage in discriminatory or harassing behaviour. All employees will be held responsible for their own conduct and the adoption and active support of this policy and relevant programmes within their area of responsibility. Employees shall be obliged to report the occurrence of discriminatory or harassing behaviour and shall be protected from the threat of reprisal when doing so.

This policy shall be supported by appropriate standards, procedures and programmes that are designed to facilitate a harmonious workplace where discrimination is not tolerated, and promotion is based upon merit.

The adoption of the above is designed to ensure that all prospective and current employees are treated equitably, without fear of discrimination and with protection against all forms of harassment.

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Scott Donaldson

Chief Executive Officer Date: 31st July 2020

Financial and Commercial Management Policy

BMC Minerals Ltd ("BMC" or the "Company") have an obligation to adopt financial and commercial policies and processes that maximise financial returns to the shareholders that have entrusted the Company with their funds. Our financial and commercial management shall aim to achieve the following objectives as a minimum standard rather than as a final goal:

- Enhance the Company's reputation as an honest, ethical business operator with sound economic management;
- Comply with both the Business Integrity framework (BIF) and relevant legislative and statutory obligations;
- Maximise the efficient use of shareholder funds and returns on shareholder investment
- Value add at every opportunity;
- Efficiently use all Company assets;
- Create a company that the community at large, our shareholders, joint venture partners, suppliers and employees can be proud to be associated with.

We will achieve these objectives by:

- Complying with the BIF and relevant legislative and statutory obligations,
- Ensuring that all business related decisions and actions are conducted in an ethical manner,
- Adopting clear, simple financial processes that include an appropriate degree of rigour,
- Setting realistic annual budgets and forecasts, designed to achieve the targets approved by the Board,
- Adopting supporting policies and management processes that maximise financial control, efficiency and efficacy and as far as is practicable eliminate waste so as to support the achievement of budgeted financial outcomes,
- Adopting continuous improvement processes including both self and external auditing;
- Ensuring the engagement of external service providers is actioned in accordance with proper commercial considerations and that scopes of work, contract terms and conditions are appropriate and are within company guidelines and that management are aware of any risks associated with the contract to ensure appropriate management,
- Ensuring that Company personnel clearly understand their responsibilities and authorities with respect to financial and commercial matters and that matters requiring elevation to a higher level are done so expeditiously,
- Ensuring the implementation of protocols providing for appropriate separation between authorisation of agreements and approval of payments so that no single person can both authorise a service and approve payment without controls,
- Ensuring that all employees are able to recognise conflicts of interest or related party transactions and that such occurrences are declared to management to enable risks to be mitigated and disclosed in accordance with Company policy and relevant corporate legislation,
- Providing appropriate and sufficient leadership and training for our staff to enable them to positively contribute to the adherence and achievement of this policy objective.

A handwritten signature in blue ink, appearing to read 'Scott Donaldson'.

Scott Donaldson

Chief Executive Officer Date: 31st July 2020

Fitness for Work Policy

BMC Minerals Ltd (“BMC” or the “Company”) is committed to the safety of its employees and has a Duty of Care to provide a safe working environment. Employees have a reciprocal Duty of Care for their own safety and the safety of their fellow workers and the public.

The Company operates a number of mining and exploration sites and recognises the importance of all personnel presenting for work at all times in a fit state, where a failure to do so may place an employee or their co-workers at significant risk of injury or death. The Company recognises that there are a number of factors that can have a serious negative impact on the ability of personnel to safely carry out their duties and/or to make appropriate decisions.

Some of these factors include.

- Health related matters including sickness and injury
- Fatigue
- Emotional or mental distress
- Misuse of drugs and alcohol

In line with BMC’s commitment to occupational health and safety, the Company shall ensure that appropriate allowance for the above matters is addressed within the Safety Management System procedures, our operating and reporting protocols and work rosters. We will also ensure that employees, supervisors, and line managers have the ability to recognize “at risk situations” and to act appropriately when those situations exist. The Company shall also support the provision of information regarding education programs and access to counselling services will be made readily available to all employees and immediate family members under an appropriate Employee Assistance Program.

BMC will only employ personnel who have successfully undertaken pre-employment medical examinations (including substance abuse screening) and who agree to undergo regular screening as part of their employment with the Company. The Company shall also adopt clear safety controls for the management of employees who fail to report for work in a fit state to safely carry out their designated duties.

BMC is firmly committed to developing a workplace which is free from deleterious effects related to mental and emotional distress, fatigue, the misuse of drugs or alcohol so that our people are in a fit state to make decisions that result in a safe place to work for themselves, their co-workers and site visitors.



Scott Donaldson
Chief Executive Officer Date: 31st July 2020

Indigenous Participation Policy

BMC Minerals Ltd ("BMC" or the "Company") is supportive and respectful of the rights of indigenous peoples to maintain their identity, traditions, and culture. The Company seeks to improve the direct and indirect indigenous participation and support traditional and cultural activities within the communities that we operate our projects.

The Company will;

- Support the participation of local indigenous people in our projects both during development and operation;
- Respect local indigenous knowledge, cultures and traditional practices when developing and operating our projects;
- Encourage development of agreements and other constructive arrangements, and the relationship they represent, to provide the basis for a strengthened partnership between indigenous people and the Company;
- Promote the practice and revitalization of cultural traditions including but not limited to avoidance of heritage sites, and protection of artefacts; and
- Support local ceremonies, visual and performing arts.

These ideals will be cultivated through designed programs and initiatives including;

- **Indigenous Representation** on management committees and teams reviewing mine operations;
- **Cultural Education and Awareness** programs which are supportive of and educate about the history, culture, language and beliefs of indigenous peoples and local communities;
- **Cultural Leave** programs which support culturally important events and connection to land through the participation in traditional land activities;
- **Incorporation** of Traditional Knowledge and Values into management of the project;
- **Education and Training** support for local Indigenous peoples to promote senior roles and responsibilities in the operations; and
- **Actively Pursue** mutually beneficial sound legal agreements and other structural arrangements that promote a healthy project and healthy community.

Support of indigenous self-organization and participation will promote solid outcomes for the project, the community, the Company, and all stakeholders.



Scott Donaldson
Chief Executive Officer Date: 31st July 2020

Occupational Health & Safety Policy

BMC Minerals Ltd ("BMC" or the "Company") recognises it has a Duty of Care to ensure that all activities undertaken under the Company's control achieve and maintain a high standard of occupational health and safety for all employees, contractors and visitors. All employees and others on our operating sites have a reciprocal Duty of Care to ensure that they contribute to the objective of achieving a safe and injury free workplace.

The Company shall maintain an Occupational Health and Safety Management System that supports our commitment to continual improvement of OH&S performance. It shall set and operate under measurable and deliverable objectives and targets aimed at the elimination of work related hazards, incidents, injuries, and illnesses.

We are committed to achieving these objectives and targets through:

- Providing consistent and clear leadership on safety related matters at all levels of the organisation;
- Providing adequate funding and resources to ensure that the requirements of the Safety Management System are in place and are operable;
- Ensuring that this policy is supported by other appropriate policies, standards and procedures;
- Gaining the total involvement and commitment of everyone working on our sites to achieve an incident free and healthy workplace;
- Proactively seeking to eliminate unacceptable risks through a systematic risk identification and assessment process that is an integrated part of day to day operations;
- Providing a level of training to ensure that work is managed and carried out in a manner designed to achieve a safe, efficient and productive outcome;
- Complying with all applicable legislation, acts, regulations, codes of practice and standards;
- Internally and externally auditing safety performance and systems implementation in all areas; and
- Ensuring this Safety and Health Policy is available to all employees, contractors, visitors and interested parties, and that they are informed of, and understand their obligation in respect to this policy.

Through implementation of this policy and the total commitment of all BMC's people, it is intended that Safety and Health objectives and targets will be achieved.

A handwritten signature in blue ink, appearing to read "Scott Donaldson".

Scott Donaldson

Chief Executive Officer Date: 31st July 2020

People Policy

BMC Minerals Ltd (“BMC” or the “Company”) recognises that its ability to deliver the Company’s strategy depends on its People.

The Company is committed to creating a workplace and environment which attracts, employs and maintains high performing individuals through effective employment practices and clear expectations of conduct and behaviour.

Our People Policy sets out the framework principles that the Company will adopt to reinforce the Company’s principles of ethics and honesty as follows:

- Adopting the principle of Leadership by Example;
- Fostering a culture that values achievement at individual, team, and Company levels;
- Proactively managing all people related decisions and processes consistent with Company policies and legislation;
- Developing and implementing employee relations management plans and agreements in line with project requirements and legislation;
- Treating People with respect;
- Fostering and enabling partnerships with local communities for sustainable social and economic outcomes;
- Supporting inclusiveness and diversity to ensure that our People are valued for their unique contribution;
- Employing suitably qualified and competent people through the adoption of equal employment and anti-discrimination procedures;
- Through the commitment to a discrimination and harassment free workplace;
- Implementation of Health and Safety Policies and the supporting Safety Management System procedures to provide a safe working environment
- Maintaining a harmonious work environment through early identification and management of employment and performance related issues;
- Developing a culture that promotes both teamwork and individual accountability and responsibility.

The achievement of these objectives will ensure a mutually beneficial outcome for employees, the Company and stakeholders.

A handwritten signature in blue ink, appearing to read 'Scott Donaldson'.

Scott Donaldson
Chief Executive Officer Date: 31st July 2020

Anti-Bribery & Corruption Policy Summary

BMC Minerals Ltd ("BMC" or the "Company") is committed to maintaining a high standard of integrity, investor confidence and good corporate governance.

This Policy summary should be read in conjunction with BMC's Anti Bribery & Corruption Policy and Procedure. This summary, in conjunction with the supporting Procedures, Guidelines and Registries, form part of BMC's risk management framework, which includes BMC's Business Integrity Framework and other associated risk and compliance policies.

This Policy applies to anyone who is employed by or works at BMC, including employees (whether permanent, fixed term or temporary), contractors, consultants, secondees and directors wherever located.

This Policy is a critical component of BMC's delivery on its strategic goal of enduring trust, integrity and reliability and outlines BMC's requirements regarding the management of gifts and benefits.

Key objectives under this Policy are to:

- Comply with relevant legislation;
- Conduct all business activities ethically and with integrity;
- Enhance the Company's reputation.

BMC intend to achieve these objectives through the following general principles:

- not give nor offer to give nor accept gifts and/or benefits that will compromise, or appear to compromise, the integrity of the Company;
- not give nor offer to give nor accept gifts and/or benefits that may cause, or appear to cause a conflict of interest;
- decline gifts and/or benefits that are excessive or unreasonable with respect to either value or circumstance;
- keep records of gifts or benefits received and gifts or benefits distributed;
- report any instance or perceived instance of bribery, corruption, or behaviour subject to this policy or associated guidelines;
- monitor and review the performance of the policy objectives.

The Policy applies globally. The principles of this Policy must be followed regardless of whether or not that country has specific bribery and corruption laws. Where a country has specific bribery and corruption laws which are of a lesser standard to this Policy, this Policy prevails.

A handwritten signature in blue ink, appearing to read "Scott Donaldson".

Scott Donaldson
Chief Executive Officer
Date: 30th June 2021

Procurement Policy

BMC Minerals Ltd ("BMC" or the "Company") recognises that the procurement of goods and services is an integral part of its business activities and must be conducted in line with the Company's Business Integrity Framework.

The Company's objectives in relation to Procurement are:

- The Procurement of goods and services will be conducted through fair, consistent, transparent, and properly managed processes in line with relevant Company Policy and the Business Integrity Framework.
- Procurement decisions must support the long term social and economic viability of the Company.
- To support delivery of a positive legacy to the local communities within which we operate by providing and prioritizing sustainable opportunities for local First Nation, Yukon, and Canadian businesses.
- Meet and where possible exceed obligations of any Socio-Economic Participation Agreement (SEPA), or other agreements as enacted from time to time, with our First Nations partners.

To support the achievement of the Company's procurement objectives BMC will:

- Incorporate Best Value Procurement (BVP) ideology. BVP recognizes that the lowest direct cost does not necessarily equate to the highest overall value, and we must incorporate consideration of other value factors including locality, social benefit, environment sustainability, safety, reliability, technical fit, and quality.
- Where possible, procurement needs will be identified and communicated early to provide enhanced opportunities for both existing and potential new local businesses.
- Develop and maintain corporate governance protocols that support achievement of the Company's procurement objectives.

BMC recognizes that procurement requirements are often unique and, in line with this Procurement Policy, will determine the most appropriate process on a case-by-case basis. Procurement processes may include direct purchase, open tender, invitational tender, sole source, direct negotiation with existing businesses and formation of new business partnerships.



Scott Donaldson

Chief Executive Officer Date: 1st January 2022

Epidemic and Pandemic Policy

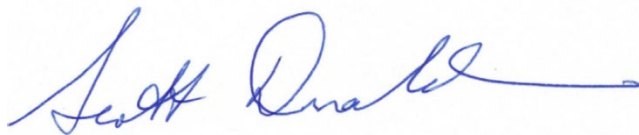
BMC Minerals Ltd (“BMC” or the “Company”) has a Duty of Care to ensure that all activities undertaken under the Company’s control are conducted in a manner that provides for a safe and healthy work environment for all employees, contractors, and visitors. All employees, contractors and visitors have a reciprocal Duty of Care to ensure that they contribute to the objective of maintaining a safe and healthy work environment.

This Policy applies to contagious diseases that have been declared as Epidemic or Pandemic by the World Health Organization or appropriate local government. The Policy defines the measures the Company will put in place to minimize the spread of Epidemic or Pandemic diseases (including Covid-19) and deal with suspected or confirmed cases. The Company will:

- Comply with current and relevant provincial/territorial government guidelines;
- Make operational decisions during outbreaks based on consideration of identified risks and available alternatives;
- Provide information to employees, contractors and visitors about active Epidemics, Pandemics or other relevant outbreaks of contagious diseases;
- Supply recommended protective equipment and materials at Company premises, such as masks and sanitizers;
- Encourage all employees to keep up to date with approved vaccinations; and
- Allow non-site based personnel to work remotely if they have confirmed cases, are symptomatic or have been potentially exposed.

At operating sites, the Company will also:

- Maintain procedures for identification and treatment of Epidemics and Pandemics based on current medical knowledge;
- Require personnel to complete self-assessments prior to site access;
- Provide methods of testing for active Epidemics and Pandemics, if available;
- Have dedicated isolation facilities; and
- Establish and maintain a medical evacuation procedure.

A handwritten signature in blue ink, appearing to read 'Scott Donaldson', with a long horizontal flourish extending to the right.

Scott Donaldson
Chief Executive Officer
Date: 8th June 2022

APPENDIX B: PROJECT POLICIES



BMC Minerals (No.1) Ltd

Heritage Policy

BMC Minerals (No.1) Ltd ("BMC" or the "Company") recognises that there is a fundamental requirement to conduct the Company's activities in an environmentally responsible and ethical manner with due regard to traditional knowledge and heritage.

BMC recognizes the value that heritage resources have for the Kaska and residents of the Yukon Territory. BMC is committed to protecting Yukon heritage and will comply with the *Yukon Historic Resource Act*, the *Yukon Archaeological Sites Regulation*, and agreements with the Kaska.

BMC is committed to building awareness and respect for heritage resources. To accomplish these objectives BMC will:

- Develop a heritage resource protection plan
- Incorporate Kaska views and traditional knowledge in planning, development and operations
- Incorporate heritage resource protection into all activities
- Deliver heritage and cultural awareness training to our employees and contractors
- Maintain the confidentiality of Kaska traditional knowledge and heritage sites

This policy shall be supported by appropriate standards, procedures and programmes that are designed to achieve the policy objectives.

A handwritten signature in black ink, appearing to read 'George Smith'.

George Smith

Date: February 2019

Director



BMC Minerals (No.1) Ltd

No Feeding of Animals Policy

BMC Minerals (No.1) Ltd ("BMC" or the "Company") respects the natural environment and takes its environmental stewardship responsibilities seriously. BMC recognises that there is a fundamental requirement to conduct the Company's activities in an environmentally responsible and ethical manner with due regard to the legacy of our actions. As such the Company has a strict *No Feeding of Animals Policy* to ensure the following:

- Local fauna experience minimal impact from the Company's activities.
- Animals do not become reliant or dependant on human feeding.
- Wildlife maintains a natural diet.
- Wildlife does not become a nuisance factor in operations through human intervention.
- Wildlife does not impact on a safe and healthy working environment for all employees and contractors.

This policy shall be supported by appropriate standards, procedures and programmes that are designed to achieve the policy objectives.

A handwritten signature in black ink that reads 'George Smith'.

George Smith

Date: February 2019

Director

No Firearms Policy

BMC Minerals (No.1) Ltd ("BMC" or the "Company") is committed to implementation of Health and Safety Policies and supporting Safety Management System procedures to provide a safe working environment for all employees and contractors. As such BMC will enforce a No Firearms Policy which includes the following:

- All firearms are prohibited at the BMC Minerals (No. 1) Ltd, Kudz Ze Kayah site unless otherwise authorized by BMC Management.
- Firearms are to only be used for the protection of personnel and property in the event of dangerous wildlife.
- All hunting of wildlife or recreational shooting is strictly prohibited.
- All authorized firearms at the Kudz Ze Kayah Project site are under direct control of the BMC Management or an employee(s) designated by BMC Management.
- As described in the *Yukon Occupational Health and Safety Regulations*; "any worker who is required to use, handle or otherwise have control of a firearm shall:
 - have successfully completed the Canadian Firearms Safety Course, given by an instructor who is designated by a chief firearms officer, and
 - have demonstrated proficiency with that firearm to the employer."
- Every designated employee who handles firearms in the course of their duties, must hold a valid Federal Firearms Possession License with non-restricted acquisition privileges.
- All firearms must be handled and stored in accordance with the federal *Firearms Act*. This includes, but is not limited to, locking mechanisms on all firearms when not in use and proper storage of ammunition.

This policy shall be supported by appropriate standards, procedures and programmes that are designed to achieve the policy objectives.



George Smith

Director

Date: February 2019



BMC Minerals (No.1) Ltd

No Recreational Use of All-Terrain Vehicles and Snowmobiles Policy

BMC Minerals (No.1) Ltd ("BMC" or the "Company") is committed to minimizing the environmental footprint of our operations and providing a safe working environment for all employees and contractors. As such BMC will enforce a No Recreational Use of All-Terrain Vehicles (ATVs) and Snowmobile which includes the following:

- Recreational use of ATVs and snowmobiles is prohibited at the BMC's Kudz Ze Kayah site.
- Use of the tote road to access recreational areas for ATVing and snowmobiling is strictly prohibited.

This policy shall be supported by appropriate standards, procedures and programmes that are designed to achieve the policy objectives.

A handwritten signature in black ink, appearing to read 'George Smith'.

George Smith

Date: February 2019

Director

No Hunting – No Fishing Policy

BMC Minerals Ltd ("BMC" or the "Company") understands and respects that local First Nations rely upon fish, wildlife, and other resources within their traditional territories as a food source, and to sustain social and cultural traditions.

BMC's site policies and practices are designed to ensure that its mineral exploration and mining activities don't adversely affect the abundance of fish and wildlife in the region of its projects: and that the presence of Company personnel and its contractors on its sites do not place additional burden on these resources.

All employees, agents, contractors, and consultants of BMC who have accessed First Nations traditional territories as a result of a contract to perform services on the Company's projects are prohibited from utilising that access for the purpose of hunting or fishing.

This restriction does not apply to BMC employees, agents, contractors and consultants who as residents of nearby communities may participate in their customary practice of hunting and fishing in their territory during their rostered time away from the site.

This policy shall be supported by appropriate standards, procedures and programmes that are designed to achieve the policy objectives.

A handwritten signature in blue ink, appearing to read "George Smith".

George Smith
Director

Date: November 1, 2023

APPENDIX C: ENGAGEMENT SUMMARY

Appendix C: Table 1 – Summary of Rationale for Organizations Contacted for Participation in the SEMP Development

Organization	Rationale
Association of Yukon Communities (AYC)	AYC represents the interests and priorities of Yukon municipalities. Engaging AYC helps BMC ensure that socio-economic effects, such as employment, housing pressures and municipal service demands in communities throughout the Yukon are understood from the perspective of those communities.
BYTE – Empowering Youth Society	BYTE fosters space and relationships where youth feel seen, validated and connected; offers pathways for employment and leadership; and, amplifies youth voices for change. Engaging BYTE helps BMC to gain perspective from Yukon youth about concerns and opportunities related to socio-economic effects including employment and wellbeing.
Canadian Mental Health Association (CMHA)	CHMA can provide expertise on community mental health needs and potential social and psychological effects associated with mine development and operations. Its input can help identify opportunities to support mental well-being, strengthen community resilience, and address potential pressures related to population growth, workforce changes, and other project-related socioeconomic impacts.
Carmacks Development Corp (introduction by YFNCC)	The Carmacks Development Corporation is the economic development arm of Little Salmon/Carmacks First Nation and supports business development, investment, and employment opportunities for its citizens. Its input can help identify potential opportunities and challenges related to Indigenous business participation, procurement, workforce development, and regional economic benefits.
City of Whitehorse (CoW)	The City of Whitehorse is the Yukon's largest municipality and regional service centre, where some Project employees may choose to live. Its input can help identify potential socio-economic effects on municipal services, housing, transportation, and community development.
Council of Yukon First Nations (CYFN)	CYFN represents the collective interests of Yukon First Nations and advocates on matters affecting First Nation governments, citizens, and traditional territories throughout the Yukon. CYFN can provide valuable perspectives on potential Project-related socio-economic effects and opportunities related to Indigenous employment, community well-being, culture, traditional land use, and economic participation.
Daylu Dena Council	The Daylu Dena Council represents Kaska citizens in the Watson Lake area and delivers a range of community, health, social, economic development, and cultural programs and services. Its input can help identify potential Project-related effects on community wellbeing, service delivery, employment and training opportunities, cultural values, and traditional land use activities.
Dana Naye Ventures (DNV)	Dana Naye Ventures is a Yukon-based, First Nation-controlled institution that provides business development and financial services. Its input can help identify potential Project-related opportunities for Indigenous businesses, capacity development, procurement, and economic participation.

Organization	Rationale
Dena Nezziddi Development Corporation (DNDC)	The Dena Nezziddi is an economic development corporation solely owned by Ross River Dena Council and works to create business, employment, and investment opportunities that benefit its citizens. Its input can help identify potential Project-related opportunities and challenges related to Indigenous procurement, business partnerships, workforce development, and long-term economic benefits.
Yukon Government Department of Social Services	The Government of Yukon Department of Health and Social Services is responsible for delivering health, social, and community services throughout the Yukon. Its input can help identify potential Project-related effects on healthcare, social service demand, community wellbeing, public health and safety, and the capacity of territorial programs and services to respond to population and workforce changes.
First Kaska GP Ltd	First Kaska is an economic development corporation owned by the Liard First Nation that supports business development, investment, and economic opportunities. Its input can help identify potential Project-related opportunities and challenges related to Indigenous procurement, employment, training, business partnerships, and long-term economic benefits for Liard First Nation and Kaska people.
House of Wolf & Associates	House of Wolf & Associates is a Yukon-based, Indigenous-owned and operated consultancy that works with First Nations and communities on community safety, wellness, justice, and social development initiatives. Its input can help identify potential Project-related effects on community wellbeing, public safety, vulnerable populations, and the capacity of communities to respond to social and economic change.
Help & Hope for Family Society	Help and Hope for Families Society provides support services and shelter for individuals and families affected by family violence, trauma, and other social challenges in the community of Watson Lake. Its input can help identify potential Project-related effects on community well-being, family health, vulnerable populations, and the demand for social support services.
Liard Aboriginal Women's Society (LAWS)	Located in Watson Lake, LAWS supports the well-being of Indigenous women, children, and families through programs and services focused on health, safety, cultural connection, and community and social development. Its input can help identify potential Project-related effects on family wellbeing, women's safety, social services, and opportunities to support positive outcomes for Indigenous women and families.
Liard First Nation (LFN)	LFN, whose traditional territory includes the Project area, can help identify potential effects and opportunities related to employment, training, community wellbeing, culture, traditional land use, environmental stewardship, and economic participation, while ensuring that Kaska interests and values are considered throughout Project phases.
Queer Yukon Society	The Queer Yukon Society supports and advocates for 2SLGBTQIA+ communities across the Yukon through education, outreach, programming, and community-building initiatives. Its input can help identify potential Project-related effects on inclusion, community wellbeing, workforce experiences, and the needs of diverse and potentially vulnerable populations.

Organization	Rationale
Ross River Dena Council (RRDC)	Ross River Dena Council, whose traditional territory includes the Project area, can help identify potential effects and opportunities related to employment, training, community wellbeing, culture, traditional land use, environmental stewardship, and economic participation, while ensuring that Kaska interests and values are considered throughout Project phases. Additionally, RRDC is the signatory for Kaska on the Project's Socio-economic Participation Agreement.
Ross River Hope Centre	Ross River Hope Centre provides support services aimed at improving individual and family wellbeing for the community of Ross River. Its input can help identify potential Project-related effects on community wellness, vulnerable populations, and opportunities to support positive social outcomes for the community.
Ross River Margaret Thompson Centre	The Ross River Margaret Thompson Centre provides health, wellness, and social support services to residents of Ross River. Its input can help identify potential Project-related effects on health and social services, community wellness (including addictions), vulnerable populations, and local service capacity
Selkirk Development Corporation (SDC) (introduction by YFNCC)	The Selkirk Development Corporation is the economic development arm of Selkirk First Nation and works to create business, employment, and investment opportunities for its citizens. Its input can help identify potential Project-related opportunities and challenges related to Indigenous procurement, business partnerships, workforce development, and long-term economic benefits for First Nation communities.
Tourism Industry Association of Yukon (TIA)	The Tourism Industry Association of Yukon represents operators and businesses across the territory and advocates for the sustainable growth of Yukon's tourism sector. Its input can help identify potential Project-related effects on tourism, visitor experiences, regional infrastructure, workforce availability, and opportunities to support coexistence between resource development and tourism activities.
Town of Faro	The Town of Faro may experience Project-related effects associated with an influx of workers and their families. Its input can help identify potential effects on housing, municipal infrastructure and services, community wellbeing, local businesses, and opportunities for economic development.
Town of Watson Lake	Watson Lake is anticipated to experience Project-related effects due to its role as a primary transportation and logistics hub, with most export and re-supply traffic moving through the community. The Town's available housing capacity, supporting infrastructure, and efforts to encourage population growth may also position it to benefit from Project-related economic, demographic, and service changes.
Watson Lake First Nation Health	Watson Lake First Nation Health promotes community health and wellness through culturally appropriate healthcare services to First Nation members in the Watson Lake region. Health services play an important role in addressing community health needs and supporting culturally safe care.

Organization	Rationale
Watson Lake Food Bank & Soup Kitchen	The Watson Lake Food Bank & Soup Kitchen provides food assistance and other essential supports to individuals and families experiencing food insecurity and financial hardship in the Watson Lake area. Its input can help identify potential Project-related effects on vulnerable populations, community wellbeing, cost of living pressures, and demand for social support services.
Whitehorse Aboriginal Women's Circle	The Whitehorse Aboriginal Women's Circle supports Indigenous women and families through cultural programs, advocacy, education, and community-building initiatives. Its input can help identify potential Project-related effects on the wellbeing, safety, and socioeconomic conditions of Indigenous women and families, as well as opportunities to promote inclusive and culturally appropriate outcomes
Yukon Aboriginal Women's Council (YAWC)	The Yukon Aboriginal Women's Council advocates for the rights, well-being, and advancement of Indigenous women, girls, and gender diverse people and their families across the Yukon. Its input can help identify potential Project-related effects on Indigenous women, families, community wellness, safety, and access to culturally appropriate supports and opportunities.
Yukon Anti-Poverty Coalition (YAPC)	The Yukon Anti-Poverty Coalition works to reduce poverty and address social and economic inequities through advocacy, research, education, and community collaboration. Its input can help identify potential Project-related effects on vulnerable populations, cost of living, housing affordability, income inequality, and access to community supports and services.
Yukon Big Game Outfitters (YBGO)	The Yukon Big Game Outfitters Association represents licensed outfitting businesses that rely on healthy wildlife populations and access to wilderness areas to support hunting tourism in the Yukon. Its input can help identify potential Project-related effects on wildlife, access to hunting areas, tourism-based businesses, and the outfitting industry's economic interests.
Yukon Chamber of Commerce	Yukon Chamber of Commerce represents businesses and industry sectors across the Yukon and provides a territory-wide perspective on economic development. As a key business organization, it can provide insight into potential Project-related effects and opportunities related to employment, workforce availability, local procurement, business growth, and economic diversification.
Yukon First Nation Chamber of Commerce (YFNCC)	YFNCC advocates for Indigenous business development and economic participation across the Yukon. Its input can help identify potential Project-related opportunities and challenges for Yukon First Nation businesses, including procurement, partnerships, capacity development, and long-term economic benefits.
Yukon First Nations Cultural & Tourism Association	The YFNCT supports the development and promotion of Indigenous cultural tourism and works to preserve and celebrate Yukon First Nations cultures, traditions, and heritage. Its input can help identify potential Project-related effects on cultural resources, traditional land use, tourism opportunities, and the preservation and sharing of Indigenous culture and knowledge.

Organization	Rationale
Yukon Heritage Branch	The Yukon Heritage Branch is responsible for the identification, protection, management, and promotion of Yukon's heritage resources, including archaeological sites, historic places, and cultural heritage. Its input can help identify potential Project-related effects on heritage resources and ensure that appropriate measures are considered to protect and manage heritage values throughout the Project lifecycle.
Yukon Status of Women's Council	The Yukon Status of Women Council works to advance gender equality and improve the social, economic, and political wellbeing of women in the Yukon. Its input can help identify potential Project-related effects on women, families, workplace inclusion, community safety, access to opportunities, and broader socioeconomic outcomes.
Yukon Women in Mining	Yukon Women in Mining supports the recruitment, retention, and advancement of women in the mining industry through networking, mentorship, education, and advocacy. Its input can help identify potential Project-related effects and opportunities related to workforce participation, workplace inclusion, career development, and the experiences of women working in or affected by the mineral sector.
Yukon Women Gender Equity Directorate	The Women and Gender Equity Directorate is a YG department that works to advance gender equity and inclusion across the Yukon through research, funding programs, and collaboration with community organizations. Its input can help identify potential Project-related effects on women and gender-diverse people, including employment opportunities, workplace inclusion, community well-being, safety, and equitable access to Project benefits.

Appendix C: Table 2 – Engagement Log

Organization	Number of Attempts	Engagements	Comments	Participation in SEMP Development
Association of Yukon Communities	5	5	Engagement meeting held via Teams on March 18, 2024	Yes
BYTE – Empowering Youth Society	5	5	Engagement meeting held March 5, 2024	Yes
Canadian Mental Health Association (CMHA)	1	1	Engagement meeting held November 17, 2023	Yes
Carmacks Development Corp (introduction by YFNCC)	2	2	Engagement meeting held March 15, 2024	Yes
City of Whitehorse (CoW)	1	1	Engagement meeting held January 10, 2024	Yes
Council of Yukon First Nations (CYFN)	4	1	Engagement meeting held April 5, 2024	Yes
Daylu Dena Council	7	1	Engagement meeting via Teams attempted on April 11, 2024; one of two attendees did not log in, second attempt made on April 17, 2024 – no response received, engagement closed May 1, 2024	No
Dana Naye Ventures (DNV)	2	2	Engagement meeting held February 2, 2024	Yes
Dena Nezziddi Development Corporation (DNDC)	4	1	Attempted contact via email, received correspondence that they will “wait for Chief and Council to direct DNDC to get involved in this request” – engagement closed on April 29, 2024	No
Yukon Government Department of Social Services	1	0	Engagement attempted, no response – engagement closed on November 17, 2023	No
First Kaska GP Ltd	2	0	Attempted contact via email, no response received – engagement closed on April 8, 2024	No
House of Wolf & Associates	2	2	Two engagement meetings held in April 2024	Yes
Help & Hope for Family Society	3	3	Engagement meeting held with additional attendees on April 18, 2024	Yes

Organization	Number of Attempts	Engagements	Comments	Participation in SEMP Development
Liard Aboriginal Women's Society (LAWS)	4	0	Attempted contact via multiple mediums over six months, no response received – engagement closed on May 21, 2024	No
Liard First Nation (LFN)	8	1	Attempted contact via multiple mediums, stopped by LFN office and had a brief discussion with ED, left business cards, but no return engagement, attempted Teams meeting. Received notification from ED stating that the SEMP is "premature" as LFN has not received cost recovery funding necessary to talk about the SEMP and other activities on "Kaska land" – engagement closed on April 29, 2024	No
Queer Yukon Society	1	0	Attempted contact via letter – no response. Engagement closed May 1, 2024	No
Ross River Dena Council (RRDC)	6	1	Attempted contact via multiple mediums. Received response from Chief Loblaw asking "purpose of engagement?" and noting protection of Finlayson caribou herd, true reconciliation and achieving climate action goals set out by the United Nations, responded to queries with no further response. Engagement closed May 21, 2024	No
Ross River Hope Centre	1	0	Engagement letter sent, no response. Engagement closed on May 21, 2024	No
Ross River Margaret Thompson Centre	3	1	Engagement letter sent, received feedback to provide poster advertising meeting date and time, meeting rescheduled – engagement closed May 21, 2024	No
Selkirk Development Corporation (SDC) (introduction by YFNCC)	5	0	Email engagement sent and meeting date set, meeting rescheduled by SHE Consulting, SDC rescheduled, meeting request sent, SDC rescheduled. SHE Consulting requested written feedback due to scheduling and didn't receive response from CEO by deadline provided. Engagement closed May 21, 2024	No

Organization	Number of Attempts	Engagements	Comments	Participation in SEMP Development
Tourism Industry Association of Yukon (TIA)	2	1	Engagement email sent, meeting held on April 10, 2024	Yes
Town of Faro	2	1	Engagement email advising of nearby community visit sent. Teams meeting held on May 6, 2024, forwarded meeting notes of discussion; no response – engagement closed May 21, 2024	Yes
Town of Watson Lake	3	1	Sent letter, left voicemail three months after letter, sent invite for meeting when in community, rebooked meeting with a engagement on March 21 – engagement closed April 17, 2024	Yes
Watson Lake First Nation Health	4	2	Engagement letter sent, in person meeting requested three months after first engagement. Short meeting and discussion happened five months after first engagement; miscommunication on intent of meeting, attendees did not want to speak about the Project. Engagement closed on April 18, 2024	No
Watson Lake Food Bank & Soup Kitchen	2	0	Engagement attempts made through various mediums, no response. Contact closed on May 21, 2024	No
Whitehorse Aboriginal Women's Circle	3	2	Reached out and was advised to speak with the board; followed up discussion with chair which did “not wish to participate at this time” – engagement closed on April 9, 2024	No
Yukon Aboriginal Women's Council (YAWC)	2	0	Sent letter requesting engagement, forwarded discussion documents without response. Engagement closed May 1, 2024	No
Yukon Anti-Poverty Coalition (YAPC)	2	1	Letter of engagement sent with a follow up phone call, YAPC responded via phone call follow up “unsure how this directly relates to poverty and the YAPC” – engagement closed February 1, 2024	No

Organization	Number of Attempts	Engagements	Comments	Participation in SEMP Development
Yukon Big Game Outfitters (YBGO)	3	0	Letter of engagement sent with phone call follow up with discussion document; unable to contact three weeks after forwarding discussion document – engagement closed April 22, 2024	No
Yukon Chamber of Commerce	1	1	Letter of engagement sent with meeting on February 19, 2024	Yes
Yukon First Nation Chamber of Commerce (YFNCC)	2	1	Engagement letter sent, with a miscommunication on meeting day, rescheduled and meeting held on February 22, 2024	Yes
Yukon First Nations Cultural & Tourism Association	1	1	Sent engagement letter and discussion document with opportunity to discuss. Received email returned advising “YFNCT doesn't have the capacity to provide input on projects...”	No
Yukon Heritage Branch	2	1	Sent discussion document requesting opportunity to meet and discuss, met on April 15, 2024	Yes
Yukon Status of Women’s Council	2	0	Letter of engagement sent with follow up email including discussion documents, no response – engagement closed on May 1, 2024	No
Yukon Women in Mining	2	1	Engagement letter submitted with follow up email and brief meeting to provide introductions. Discussion document sent with no response after initial meeting – engagement closed on March 1, 2024	No
Yukon Women Gender Equity Directorate	5	0	Engagement letter sent with email meeting invite follow up, meeting was cancelled. SHE Consulting Inc emailed four more times attempting to reschedule meeting, no response received – engagement closed on April 22, 2024	No

Appendix C: Table 3 – Summary of Input Received by Organization (Summarized Based on Organizations with Similar Interests/Mandates)

Engagement Group	Summaries of Concerns and Recommendations	Locations Where Comments Were Incorporated/Addressed in SEMP
Indigenous Governments, First Nations, and Indigenous Representative Organizations	Organizations highlighted the importance of establishing and maintaining strong, respectful relationships throughout the life of the Project, including ongoing engagement with community leadership and governance bodies. Participants emphasized the need for Indigenous communities to benefit from Project-related employment opportunities and to be actively involved in discussions regarding Project planning, operations, closure, and operations. Key concerns focused on potential effects to traditional land use activities, including hunting, trapping, harvesting, and access to culturally important areas, (particularly as these relate to caribou) as well as transportation safety for community members travelling regional roadways. Participants also emphasized the importance of protecting culturally significant sites and values, ensuring transparent communication regarding Project infrastructure and environmental management, and considering the long-term legacy of Project infrastructure after mine closure. Recommendations included prioritizing local and Indigenous employment opportunities, implementing measures to improve transportation safety, undertaking progressive reclamation throughout the life of the mine, protecting trend use areas and cultural resources, and designing infrastructure with future community use in mind, where feasible. Participants also encouraged ongoing relationship-building and collaboration with Indigenous governments and communities to ensure project benefits and management measures align with community priorities and interests.	Section 3.7 Plan Implementation Section 6 Employment and Training Section 9 Traditional Land use and Cultural Heritage Section 12 Closure and Post-Mining Land Use

Engagement Group	Summaries of Concerns and Recommendations	Locations Where Comments Were Incorporated/Addressed in SEMP
Indigenous Development Corporations and Indigenous Businesses	Organizations focused on ensuring Indigenous communities and businesses are well positioned to participate in the economic opportunities associated with the Project. Participants emphasized the importance of workforce development, skills training and early awareness of employment and contracting opportunities so that community members and Indigenous businesses can build the capacity needed to benefit from the Project over the long term. Key concerns included potential barriers to participation, such as training gaps, the impacts of rotational work schedules of workers and families, and the broader health and wellbeing of individuals and communities. Participants also highlighted the importance of maintaining meaningful engagement with Indigenous communities throughout Project development and ensuring that opportunities are communicated clearly and in a timely manner. Recommendations focused on investing in training, education, and capacity building initiatives, including identifying required certifications and skills, supporting youth engagement and career awareness, and working collaboratively with communities to understand local priorities. Participants also encouraged the Project to maintain a visible community presence, support Indigenous businesses in accessing procurement opportunities, and continue listening to community needs to maximize long-term economic and social benefits.	Section 6 Employment and Training Section 3.7 Plan Implementation Section 8 Procurement Strategy Section 10 Community Contributions and Benefits

Engagement Group	Summaries of Concerns and Recommendations	Locations Where Comments Were Incorporated/Addressed in SEMP
Municipal Governments and Territorial Agencies	Organizations highlighted broad support for the economic opportunities associated with the Project, including local employment, business development, economic diversification, and population growth in Yukon communities. Participants emphasized the importance of maximizing local hiring and procurement opportunities, building workforce capacity through training and education, and ensuring communities are positioned to benefit from Project-related economic activity throughout the mine life cycle, including closure and reclamation. Key concerns focused on the potential pressures that project development can place on community infrastructure, services, and social wellbeing. Participants identified concerns related to the use of transient workers, housing availability, healthcare capacity, mental health and addictions services, substance use, family stress associated with rotational work schedules, increased traffic and transportation safety, and the need for long-term planning to manage economic transition after mine closure. Protection of heritage and archaeological resources was also identified as an important consideration. Recommendations focused on maximizing local and long-term benefits while proactively managing potential socioeconomic effects. Participants encouraged ongoing communication and information sharing regarding workforce requirements, business opportunities, transportation activities, housing needs, and Project performance. Additional recommendations included supporting local training and skills development, promoting community participation and investment, strengthening health and social supports, encouraging local residency where feasible, supporting transportation and infrastructure improvements, participating in community events, planning for closure and reclamation, and ensuring heritage resources are appropriately managed and protected throughout project development.	Section 6 Employment and Training Section 7 Economic Benefits to Governments Section 8 Procurement Strategy Section 9 Traditional Land Use and Cultural Heritage Section 10 Community Contributions and Benefits Section 11.4 Reducing Discrimination and Racism Section 11.5.1 Housing and Land Availability Section 11.5.6 Child Care Section 14.1 Individual Health Section 14.2 Family Stress Section 14.3 Reducing Alcohol and Drug Use Section 14.5.4 Workplace Conduct Section 15.1 Socio-Economic Monitoring and

Engagement Group	Summaries of Concerns and Recommendations	Locations Where Comments Were Incorporated/Addressed in SEMP
Economic Development, Industry, Tourism, and Business Organizations	Organizations highlighted strong interest in maximizing the long-term economic benefits of the Project for Yukon businesses, workers, and communities. Participants emphasized the importance of supporting local and Indigenous business participation, increasing awareness of available financing and business development resources, and ensuring that local businesses have the capacity, skills, and information needed to compete for Project-related procurement and contracting opportunities. Stakeholders also identified opportunities to build transferable skills and foster collaboration across sectors to support economic resilience beyond the life of the mine. Key concerns focused on ensuring that Project benefits remain within Yukon communities, minimizing reliance on transient workforces, and addressing potential social effects associated with rapid economic growth, including pressures on health and social services, substance use, community safety, and workforce wellbeing. Participants also noted the potential for Project-related traffic, dust, and noise to affect tourism experiences and public safety, and stressed the importance of planning for long-term community outcomes after mine closures. Recommendations focused on strengthening local economic participation, supporting workforce and business capacity development, and proactively managing potential community impacts. Suggestions included collaborating with existing business support organizations, prioritizing local hiring and procurement, supporting long-term socioeconomic monitoring, enhancing community safety measures, fostering partnerships between industry sectors, and incorporating legacy planning into Project development. Participants also encouraged consideration of post-closure uses for Project infrastructure, support for tourism and recreation opportunities, and implementation of transportation management measures to reduce disruption to communities, visitors, and other road users.	Section 6 Employment and Training Section 7 Economic Benefits to Governments Section 8.1.1 Procurement Section 10.1 Community Events and Volunteerism Section 11.5.6 Child Care Section 14.1 Individual Health Section 14.2 Family Stress Section 14.3 Reducing Alcohol and Drug Use Section 15.1 Socio-Economic Monitoring Section 12.3 Post-mining Land Use

Engagement Group	Summaries of Concerns and Recommendations	Locations Where Comments Were Incorporated/Addressed in SEMP
Health, Social Services, Gender Equity, Community Support, and Non-Profit Organizations	Organizations focused on the potential social, health, and community wellbeing effects associated with mine development and operations. Participants emphasized the importance of supporting local residents in accessing employment opportunities through training and skills development, while also ensuring that economic benefits are balanced with measures that protect community health, family wellbeing, and vulnerable populations. Concerns were raised regarding housing availability, mental health, substance use, sexual violence, community safety, the effects of rotational work schedules on families, and the long-term social impacts associated with mine closure. Participants also highlighted the importance of creating safe, inclusive, and culturally responsive workplaces and communities. Feedback emphasized the need for equitable employment opportunities, culturally appropriate wellness supports, healthy living conditions at camp, and consideration of the unique needs of women, youth, families, and Indigenous community members. Environmental stewardship was also identified as an important consideration, including protection of wildlife (particularly caribou) and ensuring effective reclamation planning. Recommendations focused on workforce development, employee wellness, community supports, and long-term sustainability. Suggested measures included providing training and education opportunities for local residents and youth, supporting mental health and family wellness programs, implementing cultural awareness and inclusion initiatives, ensuring safe and healthy camp environments, planning for reclamation and post-closure employment opportunities, supporting childcare and community services, and maintaining strong environmental management and community engagement throughout the life of the Project.	Section 6 Employment and Training Section 9 Traditional Land Use and Cultural Heritage Section 10.1 Community Events and Volunteerism Section 11.5.1 Housing and Land Availability Section 11.5.6 Child Care Section 14.1 Individual Health Section 14.2 Family Stress Section 14.5.2 Workplace Conduct Section 14.5.4.1 Camp Requirements Section 12 Closure and Post-Mining Land Use

APPENDIX D: TABLE OF CONCORDANCE

Reference No.	Proponent Commitment / Mitigation	Where addressed
Economy and Sustainable Livelihood		
Project Proposal Chapter 15 (BMC, 2017a)	BMC will implement several mitigation measures to reduce any adverse effects of the Project on traditional economic activities, including: - All firearms are prohibited unless otherwise authorized by BMC management (Appendix A-8 of the Project Proposal). - All hunting of wildlife or recreational shooting by employees, contractors and visitors is strictly prohibited, as outlined in the No Firearms Policy (Appendix A-8); this policy will be communicated to all employees and contractors during the site orientation. - Recreational use of all-terrain vehicles (ATVs) and snowmobiles are prohibited (Appendix A-11 of the Project Proposal). - Access and use of the Tote Road has been strictly controlled since the 1990s and there will be ongoing access control to the mine site, as per the requirements of the Tote Road Licence. Use of the Access Road during Project operations to access recreational areas for ATV and snowmobile use will be strictly prohibited. - Implementation of the Traffic and Access Management Plan (see Section 18.12 of the Project Proposal) will mitigate the adverse effect of increased traffic on area wildlife. - As part of the Socio-economic Participation Agreement, BMC has agreed to pay a land use interruption supplement to mitigate the effects of the Project on RRDC citizens who hold trapping rights under the registered group trapline, and operated trap lines within the Project area. - Two x four-week periods of annual vacation/time off plus regular time off on rotation.	Section 9.2.1
Project Proposal Chapter 15 (BMC, 2017a)	The point of hire for the Project will be Yukon (i.e., Whitehorse, Ross River, Faro and Watson Lake). This will help ensure that the Project's residual effects on economic growth are beneficial. In order to achieve the requirements of the Community Relations Policy (Appendix A-2) and further support local participation, BMC will: - Encourage the participation of local communities, local First Nation People and associated businesses in its projects wherever practicable; and - Develop and implement community relations management procedures and strategies that include business alliances, employment and training initiatives on safety in the workplace and practical operating skills.	Section 6.1.4
Project Proposal Chapter 15 (BMC, 2017a)	BMC's plans for continued exploration on the KZK property and nearby properties to delineate further ore reserves and extend the mine life.	Section 6.1.4
Response Report #1 (BMC, 2017b)	BMC will continue to communicate openly with Yukon Big Game Outfitters and provide regular updates on our proposed plans for development at KZK.	Section 5.2.5

Reference No.	Proponent Commitment / Mitigation	Where addressed
Project Proposal Chapter 15 (BMC, 2017a)	The point of hire for the Project will be Yukon. BMC will continue to honor the terms of the Socio-economic Participation Agreement by working with the Kaska to fill openings at the Project (for both BMC and its contractors) for qualified persons, and to the extent permitted by law, give preference to qualified job applicants in the following priority: • Ross River Dena Council citizens • Other Kaska citizens • Other Yukon First Nation citizens • Other Yukon residents; and • Others.	Section 6.1.4
Project Proposal Chapter 17 (BMC, 2017a)	In the event of an unplanned closure, BMC will give as much advance notice as practicable so that employees will know well in advance that the closure will be taking place and can start looking for new employment. The period from a decision to close to cessation of activity to only Care & Maintenance would be no less than 6 months and could be as high as 18 months under some circumstances. During the operations of the Project, BMC will implement a health and well-being program for all mine employees. This program in part will include training programs (e.g., trades, apprenticeships, management) to promote progression in employee careers but also to promote transferable skills to enable employees to be more employable, which will facilitate any transitions from working on the Project to another mine or even a different industry. Also, as part of the health and well-being program, all BMC employees will have the opportunity to take financial management training, which will teach employees about the importance of saving as well as debt avoidance. In addition, if an unplanned closure is required, BMC will help all employees prepare resumes, practice interviews and facilitate in the job search, with the intent that employees would transition quickly to new employment.	Section 12
Response Report #2 (BMC, 2017c)	In the case of a temporary or unplanned closure, the Employee Assistance Program will still be in place and will be funded by the company (and in certain circumstances by the company's insurer). This program will provide emotional and mental health support for those that need it. This program will be supplemented by the provision of externally managed outplacement services for all personnel employed by the company at the Project. Typically, these programs run from between 3-12 months from the cessation of employment (but can run longer if required) and are designed to help employees to either obtain other employment in the same field or to prepare for and subsequently obtain employment in a different field if that is their wish.	Section 12
Response Report #3A (BMC, 2018a)	During the last one to two years of the operational phase of the Project, mining activity will reduce steadily. At some point during the Active Closure period the company will offer voluntary redundancy packages to general employees. Employees with critical skills that are required for the Active, Transitional and Passive closure periods will not be offered termination packages. In this way the company expects to reduce employees on site to those numbers required for the next stage of closure (i.e. Transitional or Passive). The company will consider the unique circumstances of every employee and will give retention preference to locally based employees. This will not preclude locally based employees from requesting a termination package if they wish to take advantage of another employment opportunity elsewhere. Redundancy packages typically include the following elements: ◦ Relocation/transfers into other roles within the company (for example into exploration or environmental monitoring roles); • Retention bonus so that employees finish their employment at a time that suits the company's operational needs; • Retraining allowances to help the employees upskill to fit their future desired roles;	Section 12

Reference No.	Proponent Commitment / Mitigation	Where addressed
	• Employment outsourcing support, where the company pays for third party support for new employment roles. The degree of this support will vary depending upon the level of employment activity that is prevalent in the Yukon and Canada at the time but typically these packages are provided for 3-12 months. Outsourcing support typically includes assistance with preparing resumes, letters of application, career counselling and advice, sourcing of opportunities and coaching for interviews. It can be as comprehensive as the employee needs; • References will be provided for all employees; and • Termination redundancy payments will vary depending upon circumstances but typically these payments will vary from 1-6 months of the average annual wage of the employee.	
Project Proposal Chapter 15 (BMC, 2017a)	The Project's employability enhancement measures include: • BMC's Kaska Education Scholarship Program (initiated in 2016) • BMC's Mentor Program • General workplace training for employees • Trades apprenticeships; and • Summer employment for Kaska students.	Section 6.2
Project Proposal Chapter 15 (BMC, 2017a)	BMC will continue to apply its Kaska hiring preference and will continue to honour its Socioeconomic Participation Agreement commitments to Kaska business. BMC will rigorously apply its Employment and Anti-Discrimination Policy (Appendix A-3 of the Project Proposal).	Section 8
Project Proposal Chapter 15 (BMC, 2017a)	As part of the Socio-economic Participation Agreement, Kaska companies will be offered the right to submit a first proposal on the following contracts for goods and services: • Winter road construction • Site clearing for the permanent access road; o Access road security • Miscellaneous "civil" work (e.g., backhoe, cat hauling); o Camp catering • Reclamation work such as re-seeding • Janitorial services • Laundry and linen services • Line-cutting • Concentrate haulage • Expediting; and • Mine site fuel supply. The list is not to be considered exhaustive. In addition, the Socio-economic Participation Agreement statement includes the provision that BMC shall ensure that all its sub-contract tender documents contain a "local benefits" component, and that BMC shall give the local benefits component meaningful consideration when evaluating tender bids. This will benefit both Kaska and non-Kaska businesses. All of BMC's contractors will also be required to honor the letter and the spirit of the Socioeconomic Participation Agreement.	Section 8.1
Human Health and Well-being		

Reference No.	Proponent Commitment / Mitigation	Where addressed
Project Proposal Chapter 15 (BMC, 2017a)	To help employees and their families maintain good health, BMC will negotiate on behalf of all employees for favorable arrangements with suppliers of life and property insurance to significantly reduce the costs of these products and offer a dental and health plan for employees. BMC will also support the provision of information regarding health and wellness education programs and will initiate an Employee Assistance Program to ensure that access to counselling services will be made available to all employees and employee families as required.	Section 14.1
YESAB R3-22	The drinking water filtration and disinfection (i.e., UV units) equipment is and will continue to be National Sanitation Foundation/American National Standards Institute (NSF/ANSI) certified and is/will be regularly tested and serviced according to manufacturer's guidelines. Note this system includes a solenoid shutoff valve that is triggered by malfunction of the UV sterilizer unit. Drinking water is and will continue to be sampled on a monthly basis and sent to an International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17025. Accredited laboratory for testing of all chemical and physical parameters listed in Schedule B of the Drinking Water Regulations (Yukon Order in Council, 2007) as well as the Guidelines for Canadian Drinking Water Quality (Health Canada, 2014). BMC will monitor the water more frequently if required. The results of the water testing are and will continue to be posted in the kitchen, showers and washrooms monthly.	Section 14.5.3
YESAB R3-22	If the water does meet the drinking water regulations or guidelines, signs will be posted indicating the water is not potable and not to drink the water. Once the issue is resolved the notices will be removed and all staff and contractors will resume utilizing the water for drinking.	Section 14.5.3
YESAB R3-23	In the unlikely event that an alternative safe supply of water is needed: - BMC can install an additional groundwater well at the site, which would consist of filtration, disinfection and monitoring of the groundwater (as described in response to R3-22); or - BMC is currently planning for two water treatment plants on site to produce potable water. If the camp water supply fails, then water from the other unit can be trucked to the camp until it is repaired.	Section 14.5.3
Response Report #3 (BMC, 2018)	During operations ABM open pit blasting will occur approximately four times a week or on average once every two days. The blasts will occur at shift change at the end of Day Shift prior to Night Shift starting work, nominally this will be between 4 and 6 pm. Due to the proposed blasting schedule being at shift change there will be no adverse sleep related effects for employees. Day Shift employees will be coming off shift while Night Shift employees will be preparing to go on shift and there will be no personnel attempting to sleep at the time of the blasts.	Section 14.5.2
Project Proposal Chapter 15 (BMC, 2017a)	BMC will mitigate possible family stress of its employees through: - Extensive screening of employees before hire to gauge their suitability for shift work and to help educate them on its potential effects; - Point of hire being in Yukon reduces travel time of employees to get back to their families; - Provide assistance and education through its Employee Assistance Program to all employees and their families as required including: - Financial management training; - Drug and alcohol counselling (including time off for employees who need treatment); - Marriage counselling; and - Healthy living education (i.e., benefits of diet and exercise). - BMC will host annual family days at the mine site to show spouses and children of the employees the mine and associated facilities (BMC's experience is that families are more comfortable with their spouses being away if they have seen the site and facilities firsthand);	Section 14.2

Reference No.	Proponent Commitment / Mitigation	Where addressed
	- Communications at the site will be via microwave (to maximize bandwidth) and individual connections in each room to ensure that employees can easily communicate via Skype/Facetime etc. with their spouses and children in the privacy of their room rather than in a communal area; - BMC will provide recreational facilities at the site and all mealtimes will have healthy food options, to promote health and well-being of employees while on-shift (with the intent that this would also extend to off-shift healthy living); - Training of employees (e.g., trades, apprenticeships, management) to promote progression in their careers (which may enhance job satisfaction); - Bereavement leave will be available to all employees; and - The 2 weeks in and 1 week out shift rotations, when combined with the four weeks of annual holiday available after the first year of employment, will allow employees to take one month off twice per year.	
Response Report #2 (BMC, 2017c)	If BMC becomes aware that lack of available daycare becomes a disincentive to employment at Kudz Ze Kayah, it will engage with community and First Nation input to develop appropriate solutions. However, it should not be assumed that single parent families without strong family support will see the proposed mine as an employer of choice. BMC expects that many parents in such circumstances may not wish to work away from their family at all.	Section 11.5.6
Project Proposal Chapter 15 (BMC, 2017a)	The camp will be dry through all phases of the Project; no alcohol or recreational drugs will be permitted. BMC will follow the industry standard and institute mandatory drug and alcohol testing for potential new employees and random testing thereafter (see BMC's Fitness for Work Policy in Appendix A-5 of the Project Proposal). BMC will also support the provision of information regarding health and wellness education programs and access to counselling services will be made available to all employees and employee families through its Employee Assistance Program, as required.	Section 14.1 and 14.3
Response Report #1 (BMC, 2017b)	BMC will also support the provision of information regarding health and wellness education programs, and access to counselling services will be made available to all employees and their families through its independent Employee Assistance Program. The presence of an Employee Assistance Program service provider operating in the local communities offers other community members access to these services. Employee Assistance Program support is offered on a confidential basis and is subject to normal patient – doctor privilege. However, the company will be advised monthly on a nonspecific basis, as to the quantity, general nature and cost of the support that has been provided by the Employee Assistance Program to our employees and contractors. Experience on other mining projects has shown that significant changes in the level of demand and the type of demand for support services is a useful indicator as to the effectiveness or otherwise of company policies and management tools. If required these tools can then be modified to provide better support for employees and thereby better outcomes.	Section 14.1
Response Report #1 (BMC, 2017b)	The company currently has in place a Mentor program for First Nation personnel employed at the Kudz Ze Kayah project. The initial purpose of this program was to support potential First Nations employees to become 'job ready' and to support them in successfully applying for, preparing for and maintaining employment on the project site. However, this program will be expanded to become a more general support program for all site personnel. While it is not specifically discussed in the Project Proposal, this program will act as a useful personnel management feedback loop for the company since the Mentor is often the first point of contact for local personnel experiencing difficulties at work or at home. Where "at risk" circumstances are identified the opportunity for corrective actions by the company exists and can be acted upon such as engaging with the Employee Assistance Program. The mentor also has the capacity to propose to the Senior Site executive mitigation measures based on his or her special knowledge of the matter at issue, the person and the immediate family/social situation.	Section 14.1

Reference No.	Proponent Commitment / Mitigation	Where addressed
Response Report #1 (BMC, 2017b)	The company will provide general training to site supervisors and managers that will enable them to be better prepared to recognize the signs and symptoms of employees that may be either at risk of, or be suffering from, substance use either directly or indirectly. Once identified, support mechanisms can be initiated. BMC has stated that its intended employment point will be local communities within the Yukon including Ross River, Faro, Watson Lake and Whitehorse. The company will seek to avoid wherever practicable, employment of personnel outside the Yukon on long fly-in fly out commutes. The practical effect of this will be that company supervisors and managers will be embedded into the local community and will therefore be more aware of local issues and social stresses that may lead to unintended social outcomes either for the community or for individual family groups within the community. Our experience is that social networking will provide a level of information flow that might not be available in workplaces that operate in a predominantly longer distance fly-in-fly out structure. BMC has a strong relationship with Ross River Dena Council and is seeking to establish similarly strong relationships with local governments of Watson Lake, Liard First Nation, Faro and Whitehorse. These relationships will be supported by regular meetings between company representatives and government bodies. It is anticipated that unintended social and community issues including drug and alcohol use will be a routine topic in those discussions and will be a valuable source of feedback information for the company.	Section 14.2 and 14.3
Project Proposal Chapter 15 (BMC, 2017a)	Due to the Tote Road license requirements and BMC's commitment to public health and safety the operating area of the Project will continue to not be available for collection of traditional medicines however the company will work with local elders to find a way to allow collection in other areas where safety will not be compromised. As part of the progressive reclamation and final reclamation planning, BMC has committed to working with RRDC in identifying the species that will be used for the reclamation purposes and developing a seed collection program and seed bank in Ross River. Therefore, the potential effects on traditional medicines will be in part mitigated through this program.	Section 9.2.2
Project Proposal Chapter 15 (BMC, 2017a)	The impacts of the increased truck transportation due to concentrate haulage will be mitigated in part through the Traffic and Access Management Plan (Section 18.12 of the Project Proposal). This plan includes BMC's commitment to contracting a qualified trucking firm that will: • Use only experienced, professional drivers; • Equip all trucks with two-way radio communications; and • Implement design, safety and operating procedures proven by similar trucking systems utilized in Yukon and Canada. Risks from hazardous materials and from spills will be mitigated through the application of the Hazardous Materials Management Plan (Section 18.3 of the Project Proposal) and Spill Contingency Plan (Section 18.5 of the Project Proposal). To ensure public health is protected, BMC will follow all relevant regulations concerning potable water, food safety, and the disposal of sewage and garbage under the oversight of the Environmental Health Services Branch of Yukon Government.	Section 14.4 and 14.4
Response Report #1 (BMC, 2017b)	Any school bus zones that occur along the truck route will be identified as part of driver orientation and training program prior to the first trip of any new drivers. New driver orientation sessions will also include briefings on known high incidence areas of wildlife crossings along the route, which will be updated with new sightings as they occur as part of the Wildlife Management Plan.	Section 14.4
Project Proposal Chapter 15 (BMC, 2017a) Response Report #3A (BMC, 2018a)	The company will rigorously follow all applicable safety laws and regulations in all aspects of its operations. All employees will receive the safety training they require to do their jobs properly and safely. A rigorously enforced dry camp will also improve workplace safety. There will be a fully trained nurse and Emergency Medical Technician/Paramedic on site at all times along with all required medical supplies and equipment. Included in that equipment will be a properly equipped vehicle dedicated for medical evacuations, if necessary.	Section 14.3, 14.4, 14.5, 14.5.1

Reference No.	Proponent Commitment / Mitigation	Where addressed
	Implementation of BMC's Occupational Health and Safety Policy (Appendix A-6) and Safety, Health, and Emergency Response Plan (conceptual level detail of the plan provided in Section 18.15 of the Project Proposal).	
Community Vitality		
Project Proposal Chapter 15 (BMC, 2017a)	BMC will continue to provide local communities (Ross River, Watson Lake and Faro) with employment and business opportunities, especially through its Socio-economic Participation Agreement with the Kaska.	Section 11.2
Project Proposal Chapter 15 (BMC, 2017a)	The mitigation measures for this subcomponent are BMC's policies on alcohol and drug use and provision of counselling as required.	Section 11.3
Project Proposal Chapter 15 (BMC, 2017a)	BMC will attempt to have a beneficial effect of reducing discrimination and racism by doing all it can to eliminate all forms of discrimination and racism in the workplace. The company's Employment and Anti-Discrimination Policy (Appendix A-3) reads, in part: "All employment processes and ongoing employee performance evaluation shall be merit based, without regard to other factors such as sex, marital status, pregnancy, parental status, age, race, impairment, religion, political belief, social origin, lawful sexual activity, social preference and family responsibilities. Managers and staff at every level of the organization shall ensure they and the people around them do not engage in discriminatory behavior. All employees will be held responsible for the implementation of this policy and relevant programs within their area of responsibility." BMC will strictly enforce its Employment and Anti-Discrimination Policy prohibiting any form of discrimination or racism in the workplace. Complaints will be treated seriously and dealt with immediately. In addition to the community mentors providing a conduit to the Kaska, every department manager will have a specific requirement to maintain direct contact with the local communities. All BMC directors, supervisors and managers will have mandatory, ongoing (annual) cultural awareness training. The higher the level of employee within the company, the greater the degree of training required. In its Community Relations Policy (Appendix A-2) BMC states: "We will strive for the improvement of cross-cultural awareness through the induction, training and education of our personnel in local Indigenous Peoples culture and workplace relationships." BMC commits to hiring two Kaska citizens (one from LFN and one from RRDC) as community mentors. The mentors will be responsible, in part, for building and maintaining Kaska employee's workplace relationships and assisting with Kaska employee retention.	Section 11.4
Project Proposal Chapter 15 (BMC, 2017a)	BMC will continue to support community events and projects as the Project proceeds.	Section 10.1
Project Proposal Chapter 15 (BMC, 2017a)	As the Project proceeds, BMC will consider making donations to community recreation projects on a case-by-case basis.	Section 10.2
Infrastructure and Services		

Reference No.	Proponent Commitment / Mitigation	Where addressed
Project Proposal Chapter 15 (BMC, 2017a) Response Report #3A (BMC, 2018a)	In order to mitigate impacts on housing availability BMC has adopted a position of preferential hire for local people. The point of hire for most personnel is expected to be in the Yukon. The three closest towns to the Project are Ross River, Faro and Watson Lake. BMC notes that the definition of a “local hire” is somebody that already lives locally. BMC considers it unlikely that new employees will relocate to the towns of Ross River and Watson Lake due to current housing supply constraints. The town of Faro is different from Watson Lake and Ross River since the number of available houses in Faro outnumbers that number of residents likely to seek employment with BMC. BMC has purchased three apartment complexes in Faro, containing approximately fifteen 2-to-3-bedroom dwellings. These dwellings will be renovated and available for relocating staff as required. Excess dwellings will be made available to locals requiring accommodation. BMC is committed to working with the towns of Faro, Ross River, Watson Lake and Whitehorse as well as RRDC and LFN Chiefs and Councils to ensure that employment opportunities and housing outcomes for locally employed BMC employees are optimized. No additional mitigation is proposed for the City of Whitehorse given the programs adopted by the Whitehorse Council in relation to housing and the councils publicly stated housing targets.	Section 11.5.1
Response Report #2 (BMC, 2017c)	If BMC becomes aware that lack of available day care becomes a disincentive to employment at Kudz Ze Kayah, it will engage with community and First Nation input to develop appropriate solutions. However, it should not be assumed that single parent families without strong family support will see the proposed mine as an employer of choice. BMC expects that many parents in such circumstances may not wish to work away from their family at all.	Section 11.5.6
Culture, History, and Traditional Landuse		
Project Proposal Chapter 15 (BMC, 2017a)	BMC will strictly enforce its Employment and Anti-Discrimination Policy (Appendix A-3) and its Community Relations Policy (Appendix A-2) BMC states: We will strive for the improvement of cross-cultural awareness through the induction, training and education of our personnel in local Indigenous Peoples culture and workplace relationships. BMC is committed to hiring Kaska citizens through the Socio-economic Participation Agreement. BMC will also be hiring two community mentors to assist Kaska employees while on-shift and off shift. Through these measures, BMC intends that Kaska employees will be comfortable and supported to speak Kaska while at work.	Section 9.2.3
Project Proposal Chapter 15 (BMC, 2017a)	The work rotations will be such that at least some traditional knowledge practices can still be undertaken. The opportunity for most shift workers at the Project to two four-week periods off each year will also help mitigate the effect.	Section 9.2.1 and 9.2.4
Response Report #4A (BMC, 2018b)	Noise Levels - All of the mitigation measures described in Section 7.4.2 (Mitigation Measures) and Section 18.10 (Conceptual Noise Management Plan) of the Project Proposal are aimed at minimizing the potential effects from increased noise to wildlife and people (i.e. people on the land conducting traditional land use activities outside of the Project footprint). These mitigation measures are presented in this Response Report in Table 6-1 for the noise Valued Component.	Section 3.4 and 9.2.1
Response Report #4A (BMC, 2018b)	Surface Water – All of the mitigation measures presented in Table 6-1 for the surface water valued component will minimize effects from changes in water quality and quantity in traditional land users.	Section 3.4 and 9.2.1
Response Report #4A (BMC, 2018b)	Air Quality - All of the mitigation measures described in Section 6.4.2 (Mitigation Measures) and Section 18.11 (Conceptual Air Quality Management Plan) of the Project Proposal are aimed at minimizing the potential air quality effects that could subsequently effect water, soil, vegetation, wildlife and people (i.e. people on the land conducting traditional land use activities outside of the Project footprint). These mitigation measures are presented in this Response Report in Table 6-1 for the air quality Valued Component.	Section 3.4 and 9.2.1

Reference No.	Proponent Commitment / Mitigation	Where addressed
Response Report #4A (BMC, 2018b)	Groundwater - All the mitigation measures presented in Table 6-1 for the groundwater valued component will minimize effects from changes in groundwater in traditional land users.	Section 3.4 and 9.2.1
Response Report #4A (BMC, 2018b)	Wildlife and Wildlife Habitat - BMC has established Environmental, No Hunting / No Fishing, No Firearms, No Recreational Use of ATVs and Snowmobiles, and No Feeding of Animals policies. These policies will (in part) ensure that traditionally harvested wildlife in the Project area are not impacted by BMC employees or contractors. These policies are included in Section 1.2.2 of the Project Proposal.	Section 3.4 and 9.2.1
Response Report #4A (BMC, 2018b)	Wildlife and Wildlife Habitat - In order to minimize the effects on wildlife and wildlife habitat, BMC has minimized the Project footprint so that all Project infrastructure is confined to one watershed. By minimizing the impact to the habitat, the effects on the land users who use the land base for hunting the wildlife are also reduced.	Section 9.2.1
Response Report #4A (BMC, 2018b)	Aquatic Ecosystems and Resources: - o Fish Offsetting Plan will facilitate the removal of the fisheries passage barrier at the Robert Campbell Highway. This will result in Finlayson Creek being able to be used again for fishing as the fish will move back into the creek. - o Mitigations to ensure traditional fishing activities are not impacted due to Project activities include not constructing any of the Project facilities outside of the Geona Creek Valley (i.e. the Project will not affect the ability of RRDC/Liard First Nation (LFN) Kaska to fish in North Lakes, lower Finlayson Creek and other traditional land use waterbodies in the region). Additional mitigation measures to protect the aquatic ecosystems to the south is the pit crest height design of the ABM open pit, which will ensure all groundwater and surface water from the pit will flow north (i.e. no long term impacts to the South Lakes watershed). - o Fish tissue monitoring results will be communicated to RRDC and LFN citizens (likely by the RRDC/LFN Kaska citizen or consultant who participates in or leads the monitoring program). will to help ensure that the community is re-assured that the mitigation measures are in fact protecting fish health and that the fish can safely be consumed by the traditional land users.	Section 9.2.1
Response Report #4A (BMC, 2018b)	Terrain and Soils - BMC has established No Recreational Use of ATVs and Snowmobiles Policy. This policy will (in part) ensure that terrain in the region of the Project (which is used for traditional activities) is not impacted by BMC employees or contractors. This policy is included in Section 1.2.2 of the Project Proposal	Section 9.2.1
Response Report #4A (BMC, 2018b)	Vegetation Cover and Composition - BMC has established a No Recreational Use of ATVs and Snowmobiles Policy. This policy will (in part) ensure that vegetation in the regional area of the Project (used for traditional berry and medicinal collection purposes) is not impacted by BMC employees or contractors. This policy is included in Section 1.2.2 of the Project Proposal.	Section 9.2.1
Decision Document Terms		
Decision Document Term #F	The Government of Yukon or a delegate body shall establish a monitoring program, after consulting with LFN, RRDC, LAWS, and Yukon Status of Women Council (YSWC) to measure potential project effects against pre-project baseline data. This program shall determine the extent to which the Project's effects are associated with violence against women (with special consideration for First Nation women) and gender and sexual minorities in Ross River, Watson Lake, and Whitehorse. The development of the monitoring program should consider currently known effects but should also remain flexible so that unforeseen effects can be incorporated. The results of the monitoring shall be shared with LFN, RRDC, LAWS, and YSWC.	Section 4.2

Reference No.	Proponent Commitment / Mitigation	Where addressed
Decision Document Term #12	The Proponent shall ensure that LFN and RRDC have opportunities to participate in and influence the development of environmental and socio-economic management plans and closure objectives developed for the Project to ensure that potentially affected First Nations can collaboratively design, collect, report, manage and communicate the results of the monitoring programs to their citizens.	Section 9.2.1
Decision Document Term #13	The Proponent shall ensure that LFN has the opportunity to be part of the Proponent-Kaska environmental, cultural and heritage management program.	Section 9.2.1
Decision Document Term #14	The Proponent shall sponsor on-the-land culture activities that promote sharing of Traditional Knowledge and practices in the Project area for the duration of construction and operation of the mine. The camp details, location and structure will be developed by potentially affected First Nations and span construction, operational and closure phases of the Project.	Section 9.2.1
Decision Document Term #15	The Proponent shall provide allowance for up to 14 days of unpaid leave to all Yukon First Nation employees to allow for the exercising of Aboriginal rights related to: a. the pursuit of traditional land use activities; this will be 14 days to allow sufficient time on the land; and attending culturally important events (potlaches, dances, ceremonies, culture camps).	Section 9.2.1
Decision Document Term #16	Proponent shall maintain in trust a transition fund with sufficient funds to ensure, in the event of an unscheduled closure: a. Funds for education and retraining; b. Maintenance of the employee assistance program (EAP); and c. Payment of back wages and severance for affected employees from Watson Lake and Ross River employed by the project at time of closure. The amount of funds and their administration shall be conducted by a suitable party. The administrator shall have a local representative in either Ross River or Watson Lake to aid in ensuring the fund meets its objectives.	Section 12.1
Decision Document Term #17	Shall ensure staff have access to money management and budgeting information and resources through on-line tools.	Section 12.1
Decision Document Term #18	Recruitment for care and maintenance positions shall be done with preference for former qualified mine employees by the body overseeing care and maintenance.	Section 12.1
Decision Document Term #21	The Proponent shall develop mandatory, regular harassment prevention training in consultation with a qualified expert, to be delivered to all the Proponent's employees, contractors and consultants working at the site.	Section 14.5.4
Decision Document Term #22	The Proponent shall ensure that human resource staff complete training to enable them to effectively support employees who disclose workplace harassment. In order to increase reporting of sexual harassment and assault, human resource staff shall provide all new staff with information about ways in which they may best record and provide evidence of harassment or bullying and what happens after they make a disclosure of workplace harassment and how they will be protected from reprisals.	Section 14.5.4

Reference No.	Proponent Commitment / Mitigation	Where addressed
Decision Document Term #23	Proponent shall modify their proposed Mentor program for Yukon First Nations employees to: * ensure that women have access to a mentor or supervisor who regularly checks in to address any negative experiences related to the male-dominated work environment, and who pays special attention to potential cases of abuse; * develop a formal feedback process to ensure that enquiries are regularly made to First Nations employees to ensure that they are able to voice concerns and have addressed any negative experiences; and * involve both LFN and RRDC in further developing this Program to ensure that it meets the needs of First Nation employees.	Section 14.5.4
Decision Document Term #24	The Proponent shall, in consultation with a qualified expert and both LFN and RRDC, develop gender appropriate and gender- and sexuality-specific policies and processes which promote a safe, respectful and inclusive environment for women and gender and sexual minorities.	Section 14.5.4
Decision Document Term #25	The Proponent shall develop, with a qualified expert, an Anti-Harassment and Bullying Policy that outlines processes and actions to address any harassment or bullying which may take place within the Project's scope.	Section 14.5.4
Decision Document Term #26	The Proponent shall ensure that the on-site First Aid Technician or Emergency Medical Technician is trained in Mental Health First Aid and/or has formal mental health training to provide short-term or crisis support at the mine site, referrals to other mental wellness supports or navigation to other systems.	Section 14.5.4
Decision Document Term #27	The Proponent shall ensure that on-site employees have the ability to utilize the EAP services available (i.e. ensure that a private phone line or Internet is available to discretely reach EAP services).	Section 14.2
Decision Document Term #28	To address and mitigate impacts to employees who are or become victims of domestic abuse, the Proponent must create a policy that: * outlines clear procedures for the workplace to work with affected employees and provide appropriate resources and support; * plans for and addresses safety concerns that affected employees may have while at work to ensure all workers are safe from threats of domestic violence; and * includes a personal safety plan for employees suffering from domestic violence.	Section 14.2
Decision Document Term #29	The Proponent shall inform all BMC employees' that their eligible dependents have access to the Employee Assistance Plan (EAP).	Section 14.2
Decision Document Term #30	The Proponent shall develop standards for behavior at work and codes of conduct against sexual harassment and gender-based violence on the job site and in the broader community, including standards/codes of conduct in relation to the sex trade, and shall distribute education and awareness campaign materials on gender-based violence.	Section 14.5.4
Decision Document Term #43	Annually, the Proponent shall submit a financial forecast to the Government of Yukon for the current calendar year, and a financial forecast for the next calendar year. The Proponent shall provide RRDC and LFN with a copy of any financial forecast submitted to the Government of Yukon under this term subject to the redaction of confidential material. The financial reports must be sufficiently detailed to provide an understanding of, and a forecast for, the following: a) revenue generated from the Undertaking; b) mineral/commodity sales or transfers; c) capital expenditures; d) costs associated with development, operation, and maintenance of the Undertaking; e) depreciation expectations; and f) expected inventory of minerals at the end of the calendar year.	Section 7

Reference No.	Proponent Commitment / Mitigation	Where addressed
Decision Document Term #46	The Proponent shall make reasonable efforts, satisfactory to the Decision Bodies to either enter into a new Socio-economic Participation Agreement (SEPA) or amend any existing SEPA with: a. the Ross River Dena Council; and b. the Liard First Nation.	Section 3.5.1
Decision Document Term #49	The Proponent shall incorporate into the Operational Plan and shall implement measures and procedures which accommodate the use of the road by persons holding valid authorizations under the Resource Roads Regulation for the purpose of exercising existing or asserted Aboriginal or treaty rights. The Permittee shall not impose restrictions or requirements that would materially impede access by access authorization holders, except where necessary to address reasonable concerns respecting safety, environmental protection, or the operational integrity of the road.	Section 9.2.1

APPENDIX E: LABOUR REQUIREMENTS DURING OPERATIONS

Appendix E - Table1: Summary of Employment: Number of Personnel in the Operations Phase

Department	Roster	Preproduction Year		Production Year									
		-2	-1	1	2	3	4	5	6	7	8	9	10
Open Pit	9/5	0	11	12	12	12	12	11	11	11	11	11	10
	2/1	0	91	136	190	194	190	102	98	98	98	98	85
Underground	9/5	0	0	0	0	0	0	0	0	0	0	0	0
	2/1	0	0	0	0	33	77	97	99	88	88	88	75
Processing	9/5	0	0	9	9	9	9	9	9	9	9	9	9
	2/1	0	0	86	86	86	86	86	86	86	86	86	86
Administration	9/5	0	0	23	23	23	23	23	23	23	23	23	23
(Including Camp, Road Maintenance Contractors)	2/1	0	8	21	22	22	23	22	22	22	22	22	21
Total by Roster	9/5	0	11	44	44	44	43	43	43	43	42	42	42
	2/1	0	99	243	298	335	376	307	305	294	294	294	267
Total Personnel		0	110	287	342	379	420	350	348	337	337	337	309
Total On site at One Time		0	73	191	228	250	278	233	231	225	225	225	205

Appendix E -Table 2: Summary of Open Pit Labour Requirements, Number of Personnel by Year

Personnel	Preproduction Year		Production Year									
	Y-2	Y-1	Y1	Y2	Y3	Y4	Y5	Y6	Y7	Y8	Y9	Y10
Excavator Operator	0	3	6	6	6	6	3	3	3	3	0	3
Truck Driver	0	16	26	53	55	52	22	21	21	13	0	13
Dozer Operator	0	3	6	9	9	9	3	3	3	3	0	3
Grader / Water Truck Op	0	3	3	6	6	6	3	3	3	3	0	3
Driller	0	3	6	9	9	9	6	3	3	3	0	3
Equipment Operator / Labourer	0	6	15	18	18	18	9	9	9	9	0	9
Blast Crew	0	6	6	6	6	6	6	6	6	6	0	6
Subtotal Operators	0	40	68	107	109	106	52	48	48	40	0	40
Tradesmen - Electrical	0	3	3	3	3	3	3	3	3	3	3	3
Tradesmen - Boilermaker	0	3	6	6	6	6	6	6	6	6	6	3
Tradesmen - Mechanical	0	7	14	29	31	30	10	10	10	10	10	8
Maintenance Labourer	0	5	9	9	9	9	5	5	5	5	5	5
Fuel and Lube	0	6	6	6	6	6	3	3	3	3	3	3
Subtotal Maintenance	0	24	38	53	55	54	27	27	27	27	27	22

Personnel	Preproduction Year		Production Year									
	Y-2	Y-1	Y1	Y2	Y3	Y4	Y5	Y6	Y7	Y8	Y9	Y10
Manager	0	1	1	1	1	1	1	1	1	1	1	1
Mining Foreman	0	1	2	2	2	2	1	1	1	1	1	1
Shift Supervisor	0	3	6	6	6	6	3	3	3	3	3	3
Safety and Training	0	3	3	3	3	3	3	3	3	3	3	3
Maintenance Planner	0	2	2	2	2	2	2	2	2	2	2	1
Maintenance Foreman	0	1	1	1	1	1	1	1	1	1	1	1
Maintenance Supervisor	0	3	3	3	3	3	3	3	3	3	3	3
Clerk	0	2	2	2	2	2	2	2	2	2	2	2
Subtotal	0	16	20	20	20	20	16	16	16	16	16	16
Mining Manager	0	1	1	1	1	1	1	1	1	1	1	1
Open Pit Foreman	0	1	1	1	1	1	1	1	1	1	1	1
Chief Geologist	0	1	1	1	1	1	1	1	1	1	1	1
Geologist	0	2	2	2	2	2	2	2	2	2	2	2
Grade Control Technician	0	3	3	3	3	3	3	3	3	3	3	3
Chief Mining Engineer	0	1	1	1	1	1	1	1	1	1	1	1
Mining Engineer	0	3	4	4	4	4	2	2	2	2	2	2
Mine Technician	0	2	4	4	4	4	2	2	2	2	2	2
Senior Geotechnical Engineer	0	1	1	1	1	1	1	1	1	1	1	1
Senior Surveyor	0	1	1	1	1	1	1	1	1	1	1	1
Surveyor	0	1	1	1	1	1	1	1	1	1	1	1
Clerk	0	2	2	2	2	2	2	2	2	2	2	2
Subtotal	0	19	22	22	22	22	18	18	18	18	18	18
Total	0	99	148	202	206	202	113	109	109	109	109	96

Appendix E - Table 3: Summary Underground Labour and Equipment Requirements by Year

Personnel	Preproduction Year		Production Year									
	Y-2	Y-1	Y1	Y2	Y3	Y4	Y5	Y6	Y7	Y8	Y9	Y10
Truck Driver	0	0	0	0	1	2	6	6	6	6	6	6
Scoop Operator	0	0	0	0	3	3	6	6	6	6	6	6
2 Boom Jumbo Operator	0	0	0	0	2	3	6	6	1	1	1	1
Longhole Driller	0	0	0	0	0	1	3	3	3	3	3	3
Getman Blastcrew	0	0	0	0	3	6	6	6	6	6	6	3
Labourers	0	0	0	0	2	15	18	18	17	17	17	10
Subtotal Operators	0	0	0	0	11	30	45	45	39	39	39	29
Tradesmen - Electrical	0	0	0	0	1	7	7	7	7	7	7	7
Tradesmen - Boilermaker	0	0	0	0	0	1	1	1	1	1	1	1
Tradesmen - Mechanical	0	0	0	0	4	12	12	12	12	12	12	8

Personnel	Preproduction Year		Production Year									
	Y-2	Y-1	Y1	Y2	Y3	Y4	Y5	Y6	Y7	Y8	Y9	Y10
Maintenance Labourer	0	0	0	0	0	3	3	3	3	3	3	3
Subtotal Maintenance	0	0	0	0	5	23	23	23	23	23	23	19
Manager	0	0	0	0	1	1	1	1	1	1	1	1
Mining Foreman	0	0	0	0	1	1	1	2	1	1	1	1
Shift Supervisor	0	0	0	0	3	3	3	3	3	3	3	3
Safety and Training	0	0	0	0	3	3	3	3	3	3	3	3
Mining Engineer	0	0	0	0	0	1	1	2	2	2	2	2
Human Resources	0	0	0	0	2	2	2	2	2	2	2	2
Maintenance Supervisor	0	0	0	0	1	1	1	1	1	1	1	1
Maintenance Planner	0	0	0	0	0	1	1	1	1	1	1	0
Purchasing	0	0	0	0	1	1	1	1	1	1	1	0
Subtotal Staff	0	0	0	0	12	14	14	16	15	15	15	13
Underground Superintendent	0	0	0	0	1	1	1	1	1	1	1	1
Geologist/Sampler	0	0	0	0	2	2	2	2	2	2	2	2
Mining Engineer	0	0	0	0	1	2	2	2	1	1	1	1
Surveyor	0	0	0	0	1	1	1	1	1	1	1	1
Surface Pastefill Truck	0	0	0	0	0	0	9	9	9	9	9	9
Subtotal Staff	0	0	0	0	5	6	15	15	14	14	14	14
Total	0	0	0	0	33	73	97	99	91	91	91	75

Appendix E - Table 4: Processing Plant Labour Requirements

Position	Shift Rotation	Number of Personnel
Processing		
Treatment Plant Manager	9/5`	1
Plant Superintendent	9/5	1
Processing Trainer	9/5	1
Shift Supervisor	2/1	3
Control Room Operator	2/1	3
Operator: Crushing and Loading	2/1	3
Operator: Stockpile and Milling	2/1	3
Operator: Concentrator	2/1	3
Operator: Dewatering	2/1	3
Operator: Tails Filters	2/1	3
Operator: Day Crew	2/1	6
Operator: Tailings FEL	2/1	3
Operator: Dry Stack Dozer Operator	2/1	3
Operator: Dry Stack Truck Driver	2/1	9
Operator: Dry Stack Compactor Operator	2/1	3

Position	Shift Rotation	Number of Personnel
Operator: Gold Room	9/5	0
Operator: Sampling and Reagents	2/1	3
Operator: Paste Plant	2/1	3
Operator: Water Treatment Plant	2/1	3
Processing Administrator	9/5	1
Subtotal - Processing		58
Metallurgy		
Senior Metallurgist	2/1	1
Metallurgist	2/1	2
Subtotal - Metallurgy		3
Laboratory		
Senior Chemist	9/5	1
Chemist	2/1	6
Sample Preparation	2/1	6
Subtotal - Laboratory		13
Maintenance		
Maintenance Manager	9/5	1
Maintenance Planner	9/5	1
Maintenance Supervisor (Mechanical)	9/5	1
Maintenance Supervisor (Electrical)	9/5	1
Millwright	2/1	6
Boilermaker	2/1	2
Electrician	2/1	3
Trades Assistant	2/1	2
Instrument Technician	2/1	1
Refrigeration / HVAC Technician	2/1	2
Automotive Technician	2/1	1
Subtotal - Maintenance		21
GRAND TOTAL		95

APPENDIX F: EMPLOYEE ASSISTANCE PROGRAM INFORMATION

Need personalized support?

Sun Life Employee Assistance Program (EAP)*

Day to day challenges can be stressful. Your family and friends offer good advice, but you're still struggling. Do you need some financial planning support? Are you overwhelmed from caring for a parent in declining health? Or do you need coaching for a situation at work? Where do you turn for help?

The Sun Life EAP gives you immediate, confidential access to an expert across a variety of services. They'll work with you to assess your needs and arrange an appointment within 24 hours.

There's expert, confidential help at your fingertips.

also referred to as Lumino Health Virtual Care Employee Assistance Program, provided by Dialogue.*



How can the Sun Life EAP support me?

- You can connect to the mobile app or website 24/7.
- Receive personalized support for an unlimited number of concerns.
- Appointments are available within 24 hours at a time that works best for you.
- You'll receive a follow-up after each session to ensure your needs are being met.
- You can continue with the same mental health provider at an additional cost once session limits (per concern) are reached.
- Internet-based cognitive behavioural therapy (iCBT) is available to complement services provided by the care team.
- Get on-demand access to self-guided articles and wellness resources directly on the mobile app or website.
- You and your eligible dependents (aged 14+) can access the EAP anytime, anywhere in Canada, and at your convenience!
- Your eligible dependents age 14+ will register with their own email address. Simply add them to your profile once you create your account and send them an email invite.

How does it work?

The EAP includes support for:



Mental health: up to 4 sessions per concern



Legal: 1 session per concern



Finance: up to 2 sessions per concern



Family and Relationships: up to 4 sessions per concern



Work and Career: up to 4 sessions per concern

Read more about all of the services included in your EAP [here](#).



How do I register and use the Sun Life EAP?

The service is available via mobile and web. You can:

- go to luminovc.dialogue.co,
- download the Lumino Health Virtual Care app for **iPhone** and **Android**, or
- use the QR code.



When accessing the EAP via the app is not possible, immediate help is available by calling **1-844-342-3327**. A Member Service Specialist will assess your needs and coordinate care with the appropriate resources.

The **Registration and user guide** provides easy-to-follow steps to create your account and access services. Once you create your account, stay informed and get updates from the care team by turning on notifications.

If you are having trouble using the app or website or need help accessing your account, you can:

- **contact Dialogue by emailing sunlife-support@dialogue.co**, Monday to Friday 8 a.m. to 6 p.m. ET, or
- **visit help.dialogue.co** and use the chat feature for assistance, for after hours and weekend support.

For questions regarding your benefits plan information, you can contact the **Sun Life Client Care Centre (CCC)** at **1-800-361-6212**, Monday to Friday, 8 a.m. to 8 p.m. ET.

App Store is a trademark of Apple Inc., registered in the U.S. and other countries. Google Play is a trademark of Google Inc.

What services are included in the Sun Life EAP?



Mental Health

- Access to mental health specialists, mental health therapists, psychotherapists, and psychologists for screening, short-term coaching, and referrals as needed.
- Live virtual coaching and therapy sessions for stress, anxiety, depression, grief and loss, and more.
- For substance use, live virtual sessions can include coaching for coping strategies and healthy habits. Also included is navigational support for external resources and in-patient treatment options.¹
- Includes 24/7 access to iCBT to offer additional mental health support, with no barriers to getting started.
- Up to 4 sessions per concern,² with the option to continue with the same mental health specialist.³



Legal

- Access to a lawyer for short-term support and referrals as needed.
- Support for all legal fields, except employment and immigration law.
- One initial session with follow-ups as needed.



Finance

- Access to a financial planner for short-term support and referrals as needed.
- Support for financial planning.
- Up to 2 sessions per concern,² with the option to continue with the same financial planner.³



Family and Relationships

- Access to family and relationship specialists for short-term coaching and referrals as needed.
- Live virtual coaching or therapy sessions for relationship conflicts, separation or divorce, family dynamics, child care, and more.
- Up to 4 sessions per concern² (one session per concern for child/elder care), with the option to continue with the same specialist.³



Work and Career

- Access to career counsellors for short-term coaching and referrals as needed.
- Live virtual coaching for career planning, work conflict, performance, harassment, manager consultations, and more.
- Up to 4 sessions per concern,² with the option to continue with the same counsellor.³

Supporting women's health⁴

Women and families navigating various life stages have access to mental-health support and educational resources for areas of concerns such as:

- Infertility, pregnancy loss, baby blues and postpartum depression
- Premenstrual and menopausal disorders
- Parenting and family, children with disabilities
- Return-to-work coaching.

Additional EAP support includes:

- Health-care navigation for in-person services, clinics and specialists
- Financial planning for family building
- General nutritional counselling.

^{**} Dialogue is a wholly-owned subsidiary of Sun Life Assurance Company of Canada operating as a stand-alone entity.

¹ Complete treatment of addiction or substance use disorder isn't supported by the EAP.

² A concern is defined as a case. You can use the service(s) for an unlimited number of concerns/cases, with session limits applicable to each concern/case.

³ For an additional fee.

⁴ While we refer to women, we are inclusive of all gender identities that may be uniquely or disproportionately affected by these health issues or topics.

Life's brighter under the sun

Group Benefits are provided by Sun Life Assurance Company of Canada, a member of the Sun Life group of companies.
VC9997 10-24 ri-cd



Frequently asked questions (FAQ)

August 2024

Sun Life Employee Assistance Program (EAP)*

Overview

1. What is the Sun Life Employee Assistance Program (EAP)*?

The Sun Life EAP provides your employees with personalized support and guidance from experts across a broad range of work and life areas. For further information about each EAP service, review this brochure.

EAP includes support for:

- Mental health
- Family and relationships
- Child and elder care
- Legal and financial services
- Work and career (including manager consultation services)

Self-led educational material/internet-based cognitive behavioural therapy (iCBT) complements therapist-led care. Critical Incident Response is also available to you for an additional fee if needed. But there's more to our EAP than personal support for employees. It also provides short-term guidance and help to your people leaders through our manager coaching service. This support can help them address a range of workplace issues related to team members who report to them.

* also referred to as Lumino Health Virtual Care Employee Assistance Program, provided by Dialogue.

2. What hours can plan members access the service?

Members can easily connect to the EAP through the Lumino Health Virtual Care mobile app or website 24/7. When accessing EAP via the app is not possible, immediate help is available by calling 1-844-342-3327. A Member Service Specialist will assess the need and coordinate care with appropriate resources.

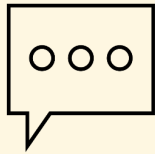
3. What health-care providers are available through the Sun Life EAP?

The EAP care team includes:

- Mental health specialists
- Mental health therapists
- Psychotherapists
- Psychologists
- Lawyers
- Financial planners
- Family and relationship specialists
- Career counsellors

4. What support is available through the manager coaching service?

Through our manager coaching service, people leaders can connect to an EAP expert for up to four sessions per concern. This gives your people leaders access to coaches to help them solve challenges in



Frequently asked questions (FAQ)

real time. This service can help them address a wide range of issues, including:

- Returns to work
- Challenging employee situations
- Managing employees remotely
- and more.

5. Are there other Lumino Health Virtual Care services available?

In addition to the Sun Life EAP, there are two other services available through the app or website:

- Lumino Health Virtual Care Primary Care
- Stress Management and Well-

Being Read more about these services [here](#).

6. What is the difference between Lumino Health Virtual Care and the Lumino Health Centre?

Lumino Health Virtual Care Primary Care, provided by Dialogue, is Sun Life's virtual care offering. It is available only to Sun Life Group Benefits Clients who have added this service to their group benefits plan. The Lumino Health Centre is available to anyone with access to mysunlife.ca. Through the Lumino Health Centre, Sun Life plan members can easily navigate, access, and consume products and services to help them live healthier lives. Plan members can:

- Find and connect with 150,000+ health professionals.
- Discover health resources and offers from a wide range of companies. They can also benefit from discounts.
- Access wellness and mental health articles.

Lumino Health is our free health and wellness platform with information that's available to all Canadians.

Plan Member Access and Experience

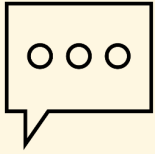
7. How do we communicate to plan members about their access to the EAP?

Sun Life has an email onboarding campaign once plan members have access to the Sun Life EAP. The onboarding emails inform plan members about what's available through the EAP.

Emails are the primary tool Sun Life uses to communicate with plan members to encourage them to enroll in our Lumino Health Virtual Care offerings. We encourage you to give us access to communicate with your plan members about the Sun Life EAP, even if you're on an exclusion list for other types of communications.

We have also provided you with some resources on our Group Benefits website. You can use them to promote the service within your organization:

- Email template
- Plan member brochure
- Plan member flyer



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8. Where can plan members find more information about the EAP?

Plan members can visit the EAP plan member site to learn more: sunlife.ca/lumino-eap.

9. What information do plan members need to register and use the EAP?

- Instructions on how to use the service using the web version are available at <https://luminovc.dialogue.co>
- The plan member onboarding campaign provides information about:
 - how to download the mobile app (called Lumino Health Virtual Care, for iPhone and Android).
 - how to create an account, invite eligible dependents, and start using the service.

Once on the app or online for the first time, the plan member needs to create a profile by entering their:

- email address
 - first name
 - last name
 - date of birth
 - postal code
- You can also share the [Registration and User guide](#) with plan members.

10. Can dependents also use this service?

Plan members with family coverage can add/invite their eligible dependents to use this service:

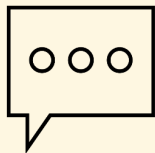
- Plan members and dependents must be physically located in Canada to use the service.
- Dependents aged 14+ are required to register with their own email address due to medical privacy laws.
- Plan members determine who to add/invite.
- Plan members with single coverage cannot add dependents.

11. Are retirees covered?

You can decide whether to include or exclude retiree groups when you add the EAP to your group benefits plans.

12. What will cancellations look like from a plan member's perspective?

If a plan member's coverage is terminated, they'll have three months to complete any open consults. However, they will be unable to initiate requests for new concerns. Plan members will retain ongoing access to their data and can reference notes as needed with or without an active subscription.



Frequently asked questions (FAQ)

Adding the Sun Life EAP to your group benefits plan

13. What if I already have a contract with Dialogue directly?

Talk to your Account Executive if you want to transition to EAP through Sun Life. Details about the service will be discussed on a case-by-case basis. Our solutions-based approach ensures we bring exceptional service to you. If you already have an EAP provider, we'll make the transition from your current provider to Sun Life as seamless as possible.

14. How will I be billed for the EAP?

A separate monthly invoice is issued for the EAP. It can be paid via electronic funds transfer (EFT) or cheque.

15. Can I keep the service for certain group benefits plans only? Or will the choice be at the contract level?

You can choose the group benefits plan level to which you would like to add this service.

Reporting

16. What type of reporting will I receive?

Patient confidentiality around use of the service is paramount. Reporting for the EAP is on an aggregate basis, not on any individual's situation. To protect the anonymity of users, we provide reporting to organizations with:

- over 35 lives, and
- over 10 registrants, and
- over 10 cases.

Questions?

Contact your Sun Life Group Benefits representative.