

GENERATION PGM

MARATHON PROJECT ENVIRONMENTAL ASSESSMENT TECHNICAL WORKSHOPS

DAY TWO

20 August 2020



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1. Wildlife, Vegetation, Species at Risk (SAR), Overall Benefit (N.Bioscience)
2. Community Engagement (GenPGM)
3. Aquatic Environment & Fisheries Offset/Compensation (Ecometrix)
4. General discussion/feedback/next steps for topics reviewed – Federal and Provincial gov't
5. Human Health Risk Assessment (Ecometrix)
6. Cumulative effects (Ecometrix)
7. General discussion/feedback/next steps for topics reviewed – Federal and Provincial gov't

9:00am to 9:05am ** Note Time Slots for Topics in Eastern Time (ET) listed at the bottom of most slides

AGENDA- WORKSHOP DAY 2 (CONTINUED)

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9. Air, Noise, Vibration, Traffic (Stantec)
10. Socioeconomic (Stantec)
11. Archaeology, Culture & Built Heritage (Stantec)
12. General discussion/feedback/next steps for topics reviewed – Federal and Provincial gov't
13. Closing General discussion/feedback/next steps for topics reviewed – Federal and Provincial gov't

9:00am to 9:05am

WILDLIFE

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- Additional fieldwork conducted in June-August, 2020 to update baseline information
- Visual surveys, trail cameras, acoustic recorders
- Confirmed continuing use of the LSA and RSA by black bear, grey wolf, marten, ...
- Detected presence of red-backed salamander (not SAR)
- No significant changes in fauna from 2014

9:05am to 9:45am



WILDLIFE - MOOSE

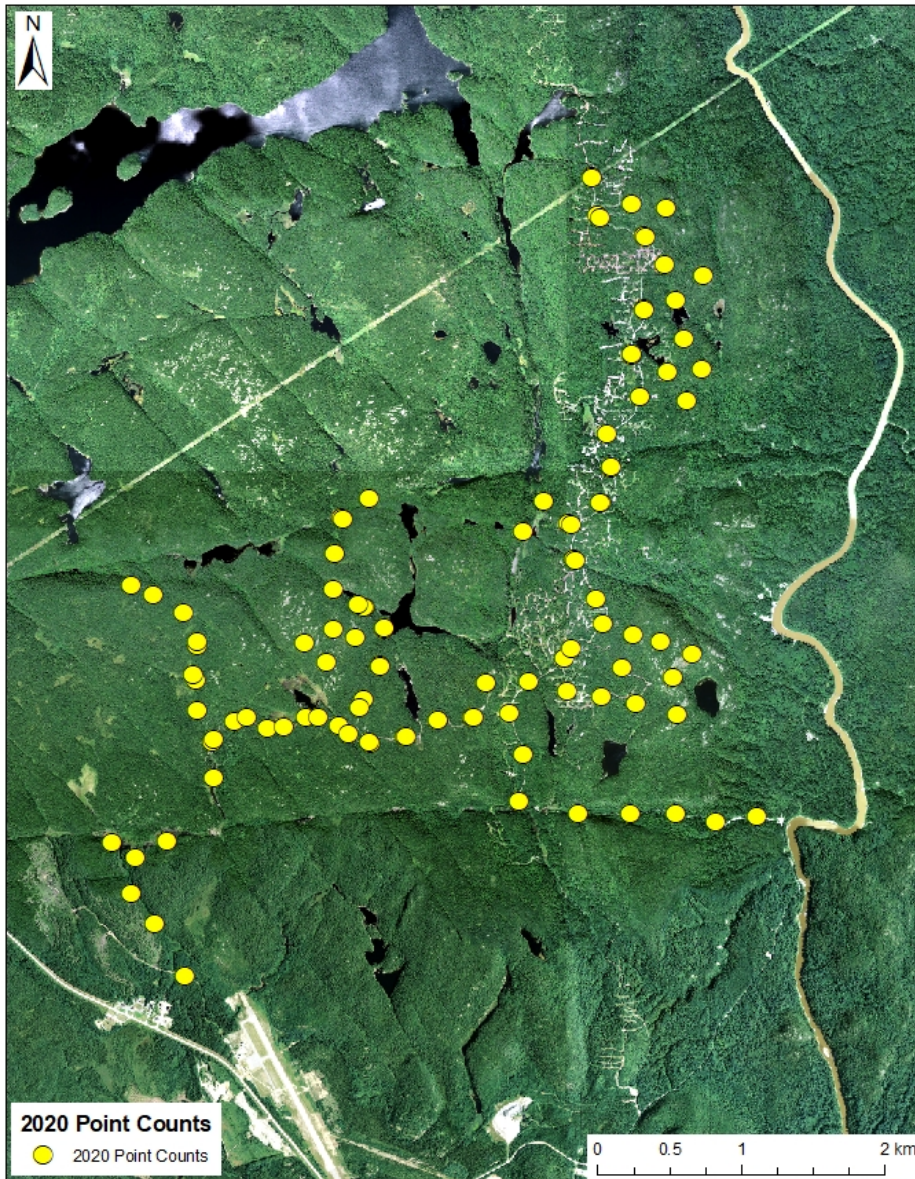
- Particular significance to First Nations – important for caribou predator-prey dynamics
- Standardized moose aerial survey (2013): 0.02 moose/km² >>> relatively low density
- 2020 sightings, sign (browse, pellets, tracks), and trail camera images
- Confirmed continuing use of the LSA and RSA
- Data from 4 caribou surveys since 2014
- Need to confirm if any recent MNRF moose surveys

9:05am to 9:45am



WILDLIFE - BIRDS

- Additional fieldwork conducted in June-August, 2020 to update baseline information
- Conducted 100+ morning point counts
- Evening point counts at selected waterbodies
- Acoustic recorders used at other locations
- Nocturnal point counts along access road
- Provided updated information on bird communities – will improve modelling of potential habitat loss from Project





VEGETATION

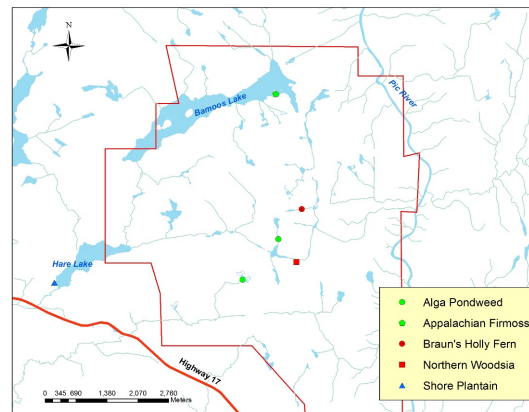
- Primarily mixedwood forest, with limited rock barrens and wetlands
- No major disturbances (i.e., fire, windstorm, insect outbreak) since 2014
- New forest resource inventory (FRI) available with ecosites
- Facilitates refined modelling of vegetation and wildlife habitat
- No significant changes in flora from 2014

9:05am to 9:45am

VEGETATION – RARE PLANTS

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- No SAR but 5 provincially rare and 11 regionally rare (Thunder Bay District) plants
- No anticipated changes since 2014
- Most not affected by Project
- One aquatic plant, Alga pondweed (*Potamogeton confervoides*), in pond in proposed PSMF footprint
- Proposed mitigation is to transplant individuals to supplement existing populations



9:05am to 9:45am



SPECIES AT RISK

- Several SAR known from the LSA
- Rusty Blackbird (SC), Eastern Wood-Pewee, and Olive-sided Flycatcher (SC) observed previously but not in 2020 (all SC)
- Canada Warbler (SC) found at several locations previously and in 2020
- Monarch (SC) and Yellow-banded Bumble Bee (SC) newly detected in 2020
- No Black Ash (SC) on site (recently assessed as SC by COSEWIC)

9:05am to 9:45am

SPECIES AT RISK – EASTERN WHIP-POOR-WILL

- Roadside nocturnal survey in 2011 & 2013
- Acoustic recorders at 4 remote sites in 2013
- Three nocturnal roadside surveys & 5 acoustic recorders at remote sites in 2020
- No evidence of use
- Suboptimal habitat? No known breeding populations between Dorion & White River



Dan Murphy



SPECIES AT RISK - BATS

- Little Brown Myotis and Northern Myotis listed as END in 2013
- Previously no targeted fieldwork conducted for them
- Roadside acoustic surveys & acoustic recorders deployed in 2020
- Confirmed foraging by at least Little Brown Myotis
- No suitable hollow trees for roosts observed >>> but maternity colonies or roosts could be present
- No known hibernacula

WOODLAND CARIBOU - RANGE

- GenPGM Project is within Lake Superior Coast Range defined by Ontario's Caribou Conservation Plan (OMNRF 2008).
- ON6 range in the national recovery strategy for woodland caribou (Environment Canada 2012)

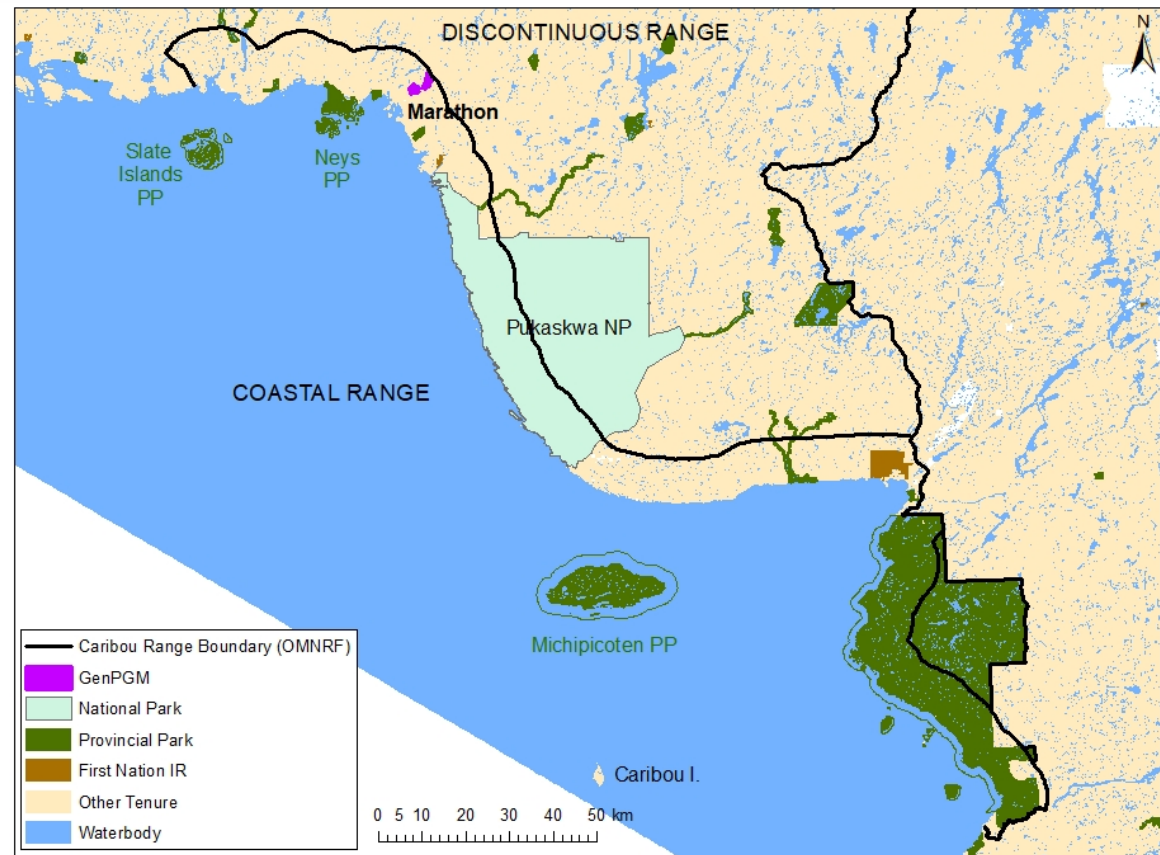


9:05am to 9:45am

WOODLAND CARIBOU - RANGE

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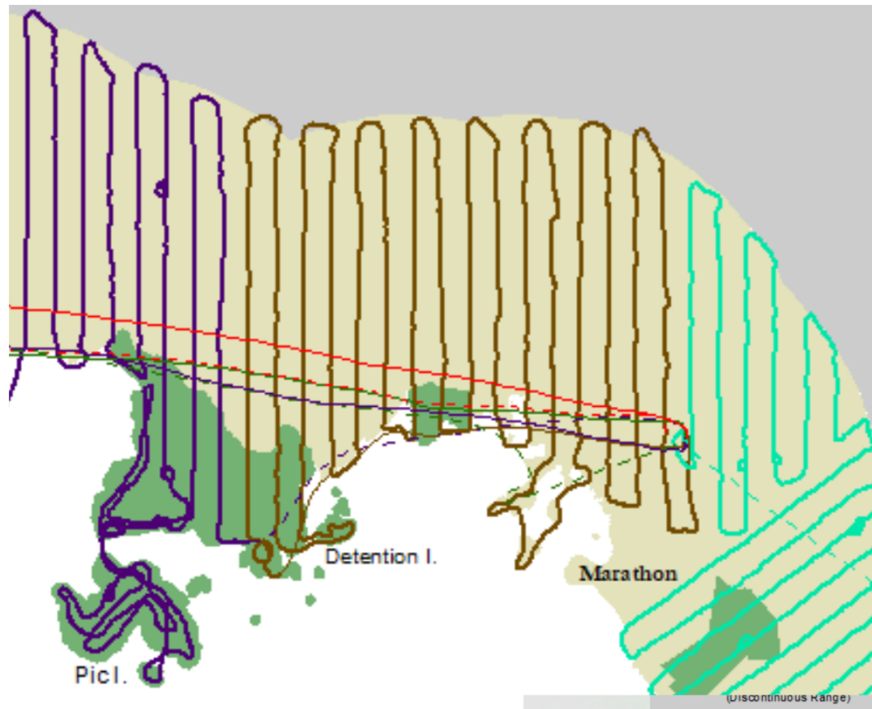
- Coast Ranges includes both mainland and offshore islands



9:05am to 9:45am

WOODLAND CARIBOU – MAINLAND

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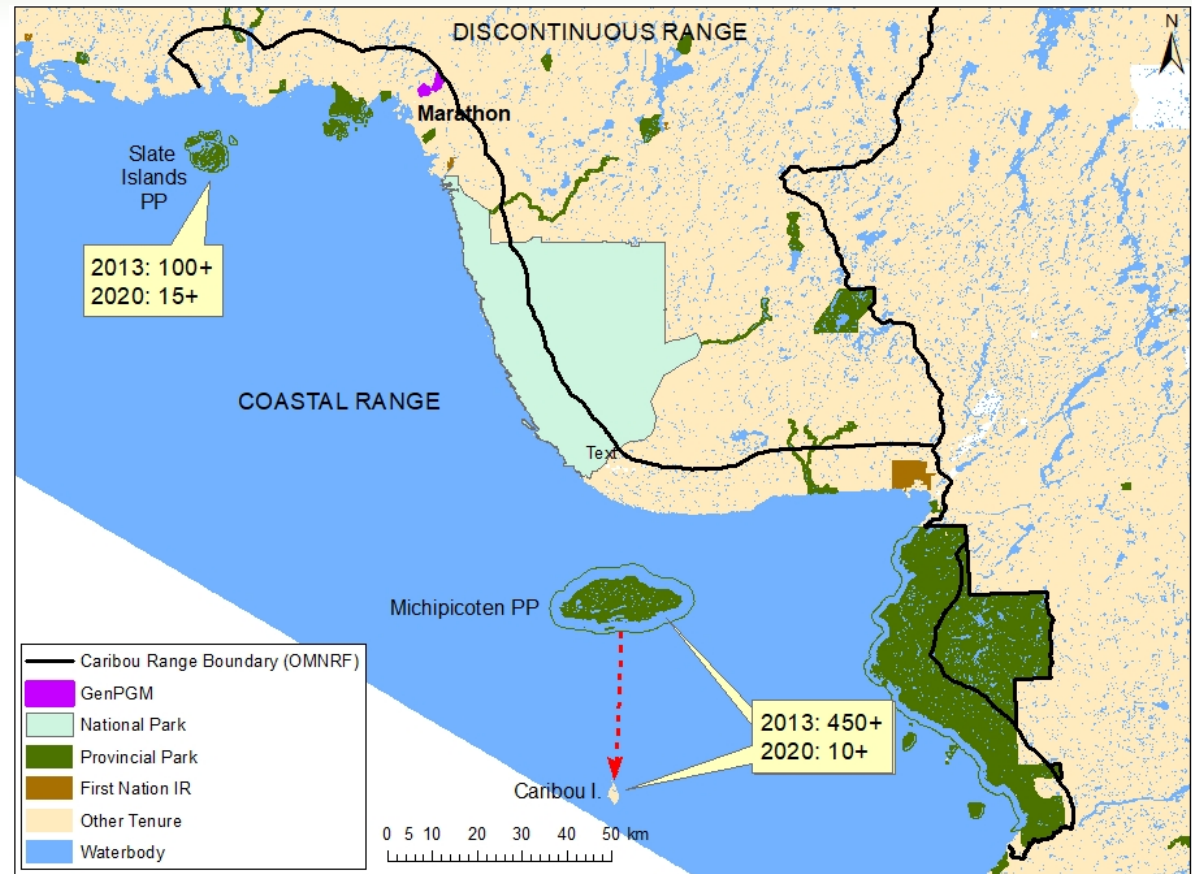
- Four aerial surveys conducted since 2014 on mainland and nearshore islands
- Only one caribou seen total
- Tracks of up to 3-4 groups caribou also observed several locations
- No sign observed east of Coldwell Peninsula (Neys P.P.) – none on GenPGM property
- OMNRF's (2018) minimum animal estimate (MAE) is 10 caribou in mainland Coastal Range
- OMNRF estimated a total of 55 ± 13 -277 based on modelling of tracks (observed vs. inferred)

9:05am to 9:45am

WOODLAND CARIBOU – OFFSHORE ISLANDS

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- Caribou on offshore islands within Coastal Range have declined dramatically since 2014 due to wolves:
- Slate Islands: ~100 in 2014 to 15+ currently (9 transferred from Michipicoten in 2018)
- Michipicoten Island: 450+ in 2014 to 0 currently
- 6 translocated to Caribou I. in 2018 from Michipicoten



9:05am to 9:45am

- Overall decline from an estimated 500-600 caribou in Coastal Range Caribou in 2013 (492 in EC 2012 RS)
- Total population in Coastal Range currently is estimated to be very small (exact # unknown)
- Less than the 100 recommended by federal and provincial recovery strategies
- 100 animals provides a 0.7 probability of not reaching a quasi-extinction threshold of less than 10 reproductively active females under stable conditions (Environment Canada 2011b).
- Vulnerable to extirpation due solely to stochastic factors
- Effectively subpopulations since little or no connectivity in absence of ice bridges

- 84% of the Coastal Range is undisturbed according to federal 2012 recovery strategy
- No range assessment has yet been conducted by OMNRF (despite commitment in 2009 provincial CCP)
- 2013 assessment for the Marathon PGM Project indicated 73% of Coastal Range is undisturbed
- >65% undisturbed threshold required for sustainable population over long-term based on EC models
- Need to update with recent disturbance e.g., EWT, forestry, mineral exploration
- Lack of anthropogenic disturbance has not prevented apparent loss of caribou from Pukaskwa

- No impact on individual caribou since no evidence of current use
- Limited impact on potential caribou habitat from GenPGM Project
- Awaiting updated caribou habitat categorization from OMNRF
- <100 ha of modelled caribou habitat overlaps Project, all of it refuge
- All but ~15 ha are already considered “disturbed” by EC caribou habitat models
- New disturbance represents <0.1% additional disturbance in Coast Range
- Potential to impair E-W connectivity with Pukaskwa – although no populations currently there
- Mine life will long be over before caribou populations recover (if they ever do)

OVERALL BENEFIT (OB)

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- Expected only for Woodland Caribou
- Developed off-site mitigation for caribou in 2013 with MNRF direction
- Final prescriptions were to be field-verified in 2014
- Proposed to create 115 ha of future conifer forest to compensate for loss of potential refuge habitat at Project site by:
 - Active road decommissioning of 77 km of roads and landings (Nama Creek, Neys, and Vein Lake road networks)
 - Vegetation management (e.g. herbicide/brush saw) and infill planting in the 80-ha Deadhorse Creek / McLaren Lake Block
- Will result in the removal of over 4000 ha of disturbance when considering the 500 m disturbance associated with the roads and enhance connectivity

OVERALL BENEFIT (OB)

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- Range Management Strategy for Coast Range not yet developed by MNRF/MECP
- Need to ensure OB is consistent with that direction
- Potential conflict with remediation objectives for other VECs (e.g., moose)
- Focus is on returning environment to pre-development state possible, and minimizing use of non-native species

COMMUNITY ENGAGEMENT

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- 14 FN and Métis communities originally identified by Federal and Provincial gov't.
- Extensive consultation process narrowed down list and determines communities that could demonstrate aboriginal rights and claimed the Project area as traditional territory
- Biigtigong Nishnaabeg, Pays Plat, Pic Mobert, Métis Nation of Ontario, Red Sky Independent Métis Nation.
- Ontario Coalition of Indigenous People (OCIP) does not meet Powley (2013, MENDM)
- Socioeconomic Regional Study area 100km used for Impact Assessment



9:45am to 10:00am

COMMUNITY ENGAGEMENT

- Important to note – when the Project paused, consultation never stopped with any of the communities interested in the Project. Frequency and type of engagement was dependent on level of activities.
- We regularly met at least every quarter, provided updates in handouts and followed up with email.
- Consultation specific to the Project – will build off past work and efforts from the last six years during pause.
- At this time, we are proceeding under premise that communities originally scoped into Project are the same. We should be notified immediately if there is a change in community list, as we have a short window for consultation prior to submission of addendum.

9:45am to 10:00am

- August 10 to 12, drop-in sessions: 2014 design versus optimized 2020 design, which is largely the same. Discuss VEC/VC, previous baseline studies, and TEK/TLU work.
- End of August, circulate back with communities on baseline, confirm workplans and timelines to refresh impact assessment. Valued Ecosystem Components (VEC/VC), TEK/TLU past studies, and baseline should be confirmed by end of August. Some communities have technical advisors assisting them.
- News briefs to be posted online and provided to communities to post on their websites. Consider publishing in local newspaper.
- Share point with communities in early-mid September to review baseline reports and ensure accurate account of community and VEC.
- Sept-Dec - Report writing and preparing final submission. December could be an info sharing point between technical group and communities. If large open houses not permitted, could be completed via video/web sessions.

- Key results of the original aquatic environment baseline program
 - Program provided a comprehensive understanding of aquatic habitats and distribution of biota on and around the Project site and within each of the potentially affected subwatersheds
 - Able to define, with a degree of certainty:
 - Fish-bearing and non fish-bearing waters
 - The distribution of key habitat types, as they support different fish life history stages
 - Distribution of fish species and community types (warm-cool water, cold water, migratory)

- Key uses of the data derived from the original baseline aquatic environment program
 - Characterize existing conditions
 - To assess potential Project-related effects
 - Direct footprint-related effects (over-printing, loss of baseflow)
 - Effects of discharge of site waters to receiving environments
 - To establishing potential needs for compensation (now Offset) under the Fisheries Act
 - To determine needs for authorization under Schedule II of MMER (now MDMER)



10:00am to 10:30am

- The EIS concluded that there would be no significant residual adverse affects on the aquatic environment based on the proposed mitigation strategies, including provisions for habitat compensation

- Update to the aquatic environment baseline program
 - Current site conditions have been evaluated and there have been no changes to the site that would affect our understanding of the aquatic environment
 - The mine site footprint (open pits) could be different (bigger) than in the original EIS with some additional over-printing of water bodies/water courses on the west side of the pit
 - Targeted surveying has been done in those water bodies/water courses to confirm the understanding of fish distribution
 - Updated baseline information will be provided in a technical memo that will be an attachment to the EIS Addendum



- Update to the effects assessment on the aquatic environment
 - Potential effects on aquatic environment VECs will be re-considered / confirmed within the context of new Project-related information
 - Could involve consideration of new or modified mitigation strategies
 - The updated effects assessment will be documented in the EIS Addendum

10:00am to 10:30am

- The original EIS documentation included provisions for fish habitat compensation to offset Project-related effects
- Habitat losses were quantified and a number of conceptual/preliminary compensation options were presented
- The options provided for a net benefit (on paper)
- The documentation was clear in that the strategy was an initial step in the planning process but provided a basic framework to move forward with towards a *Fisheries Act* Authorization, and seek input from interested parties

- Original compensation framework was developed at a time when the Fisheries Act was in transition (pre 2012 and 2012 (Bill C-68))
- The Fisheries Act has been further modified with the “new” act receiving royal assent in 2019
- The 2019 modernization restored some pre-Bill C-68 protections and incorporated other considerations, such as specific inclusion of Indigenous traditional knowledge

- For the purpose of the EIS Addendum, the fisheries offset strategy will be re-set / re-framed
 - The strategy will still be the initial step in the planning process but it will provide an updated basic framework upon which to move forward
 - The updated strategy will consider changes to the Project that may affect offset needs (potential increased footprint of the open pit) and will be developed in a manner that is consistent with the updated Fisheries Act
 - The updated strategy will be provided in a stand-alone report that will be an attachment to the EIS Addendum
 - Work in parallel to the EA process to advance the plan thereafter

PAUSE FOR DISCUSSIONS

10:30am to 10:45am

Topics for discussion:

- Wildlife
- Vegetation SAR
- Overall Benefits
- Consultation Plans
- Aquatics
- Fisheries Offset/Compensation

- Human Health Risk Assessment (HHRA) in the Original EIS Submission:
 - Potential effects on human health were assessed in the context of air quality, drinking and recreational water quality, country foods, noise and electro-magnetic fields
 - Chemical releases during all Project phases (site preparation, construction, operation, decommissioning and post closure) were considered
 - Atmospheric emissions and dust deposition during all Project phases prior to closure
 - Releases of excess water from the PSMF to Hare Lake during operations and runoff from the reclaimed PSMF to Stream 6 after closure
 - Drainage from the MRSA to the Pic River during operations and runoff from the reclaimed MRSA to the Pic River after closure

- HHRA in the Original EIS Submission
 - No adverse effects on human health were anticipated from air or water releases, country foods, noise or electro-magnetic fields
 - Air quality at the property boundary predicted to meet applicable provincial criteria, with the exception of NO_x; source of NO_x primarily vehicle emissions
 - NO_x was carried forward for further quantitative assessment because occasional exceedances of the 1-hour air criterion under worst-case conditions
 - Considered acceptable due to very low frequency of concentrations above benchmark and infrequent use of boundary locations
 - Surface water quality predicted to remain at background levels or below lowest surface water quality benchmark

- HHRA in the Original EIS Submission

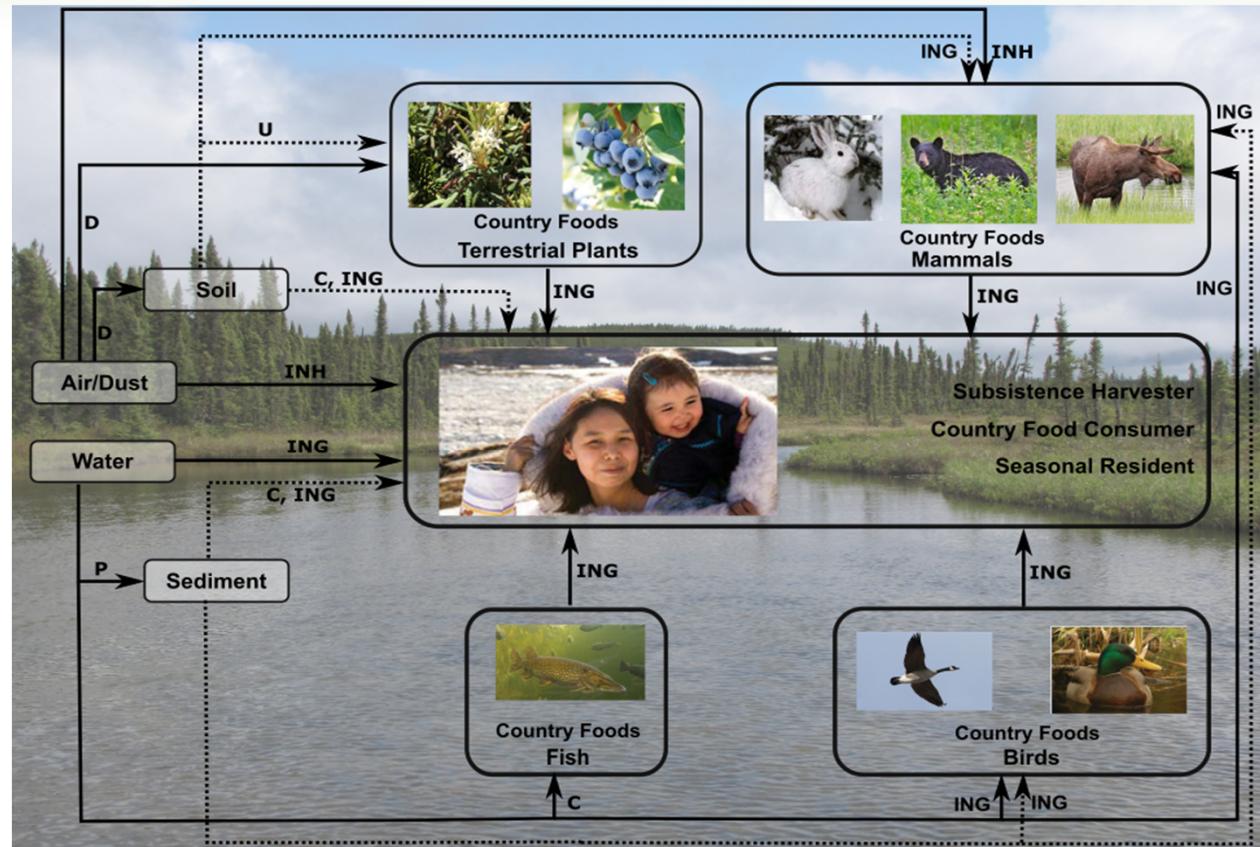
- Contingency for follow-up monitoring included:
 - Country food monitoring program to verify that metals in country foods are not a concern
 - Proposed country foods: blueberries, moose and fish
 - Sampling of supporting environmental media (air, soil, surface water and sediment) at the same time and location where possible
 - Baseline, construction and operations (every three years)
 - Summer or fall
 - 5 samples of each tissue at each sampling location
 - Reference and exposure locations within local study area

- An update to the HHRA is planned to consider:
 - New Health Canada HHRA guidance on a variety of topics (2016 - 2019)
 - New criteria/standards
 - Minor changes in mine design and Project related emissions
 - Updated information will be provided in a stand-alone report that will be an attachment to the EIS Addendum
 - This information will be summarized in the EIS Addendum re-considering / confirming the conclusions of the original EIS documentation (no significant residual adverse effects on human health)

HUMAN HEALTH RISK ASSESSMENT

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- Conceptual Site Model (CSM) development underway
 - Atmospheric emissions could affect air and soil quality, vegetation, wildlife and consumers of country foods
 - Water releases could affect water and sediment quality, aquatic life, wildlife and consumers of country foods
- Decisions regarding constituents of potential concern (COPC) and exposure pathways to be quantitatively assessed will be made moving forward as new information becomes available



Legend: D: Deposition; P: Partition; U: Uptake; C: Contact; ING: Ingestion; INH: Inhalation;
 —→ Exposure pathway from primary media; - - - - -→ Exposure pathway from secondary media.

10:45am to 11:15am

- The cumulative effects assessment from the original EIS focussed on Project-related residual adverse effects within the context of other projects/activities on a regional basis
- Two potential residual cumulative adverse effects were carried forward to the assessment of significance concerning:
 - woodland caribou
 - Indigenous land and resource uses
- The analysis characterized these residual cumulative effects as non-significant

- As part of the EIS Addendum the cumulative effects assessment will be updated
- The Addendum will consider:
 - Updated information with respect to baseline conditions
 - Updated information with respect to Project activities
 - Updated information with respect to any Project-specific optimization residual effects that may be identified
 - Updated information with respect to other new projects or activities that have been constructed or are now anticipated (i.e., certain and reasonably foreseeable future projects) within the RSA

- The updated cumulative effects assessment will be provided in a stand-alone report / section that will be included with the EIS Addendum
- The analysis will be summarized in the EIS Addendum re-considering / confirming the conclusions of the original EIS documentation (no significant residual adverse cumulative effects)

PAUSE FOR DISCUSSIONS

11:45am to 12:00pm

Topics for discussion:

- HHRA
- Cumulative Effects

- Baseline air quality is not expected to have changed substantively since the original report was prepared. Background levels of some COPCs such as PM_{2.5} are likely to have decreased (based on trends seen in long-term MECP air quality monitoring)
- Baseline air quality levels were only assessed for selected COPCs. In order to assess cumulative air quality for input to the HHERA, Stantec will characterize background levels of all COPCs
- Most recent 5-years of ambient monitoring data from representative NAPS stations will be used to characterize background levels
- Short-term and annual average concentrations will be assessed

- The air quality assessment will be updated to reflect current regulatory requirements and expectations, including:
 - Assessing predicted concentrations versus updated air quality standards
 - Using the current regulatory approved version of AERMOD (version 19191)
 - Using an MECP prepared custom meteorological data set processed with the current regulatory approved version of AERMET (version 19191)
 - Update model inputs based on current Project description (update pit dimensions, vehicle movement data, etc.)
 - Examine annual average concentrations as well as short term (hourly, 24-hour) concentrations
 - Include all COPCs in the assessment for inclusion in the HHRA
 - Update tailpipe emissions using the US EPA MOVES model

- Include diesel particulate surrogates in the assessment
- Include Traditional Resource and Land Use (TRLU) receptors in the assessment
- Assess particulate and metals deposition at HHERA receptors
- Revise GHG sections to discuss current federal/provincial GHG policies, objectives and reporting requirements

- Project baselines are based on 2009/2013 monitoring
- Baseline noise levels are not expected to have changed significantly. Decreased traffic due to COVID
- TNM modelling used to establish Hwy 17 and Town baseline at receptors
- Review and identify any new receptors around the Project area, close to Hwy17 and/or in the Town of Marathon along the rail load out route; new receptors may have to be reviewed

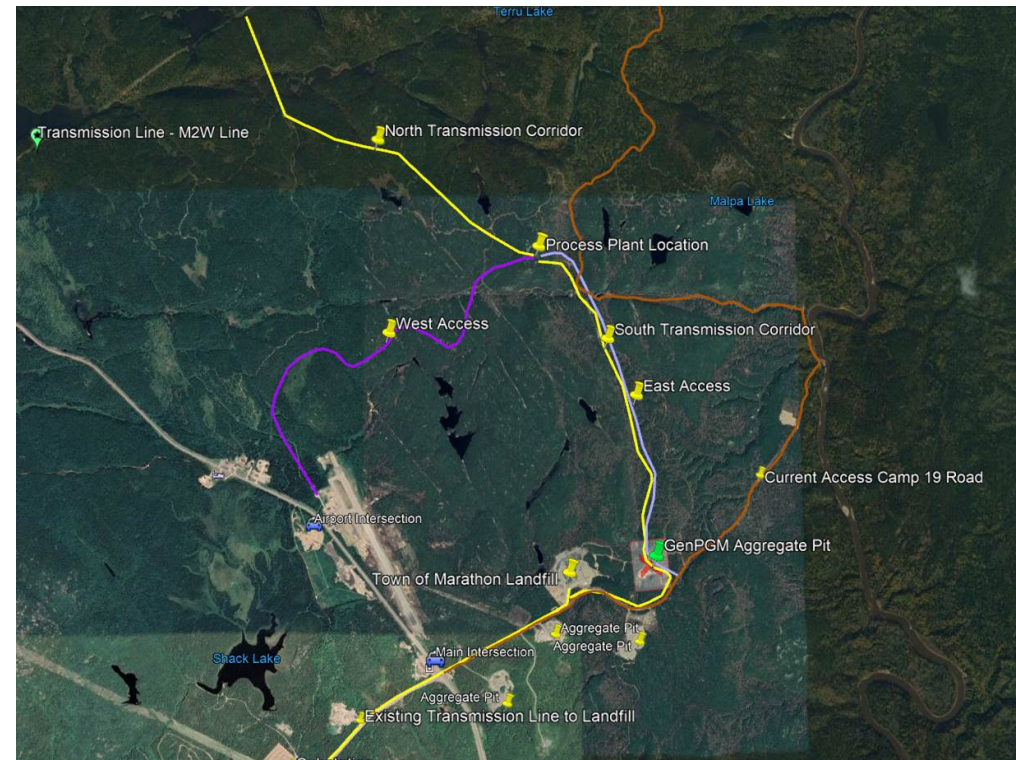
- MECP NPC-300 now supersedes LU-131 and NPC-205 for operational noise. Continuous stationary noise should remain consistent, but impulse noise may have to be addressed (though draft NPC-300 used in IR response for impulse noise)
- Traffic volumes were based on 2008 to 2011 traffic volumes, may consider updating with 2020 volumes to reassess TNM traffic modelling for baseline. An MECP landfill guideline may be considered which addresses haul route traffic noise
- We will confirm if applying NPC-119 methodology has any issues with impacts, as this was not the method used for the blasting analysis

- If blasting design is updated (e.g. charge size), may require updated blast analysis
- Blasting is acceptable by Explotech report; consider reassessment of blast analysis to limit charge size to maximum allowable to prevent building damage (Marathon Airport); reassessment based on single pit operation
- Review Project operations to see if it's in line with assessment; multi years assessed (Y3, Y6, Y11); construction assessed
- Updated operations to be reviewed to confirm noise source assumptions (e.g. number of trucks), based on revised Project design

- Updating baseline during COVID not considered representative. Consider if updated baseline is required or stand with original monitoring results
- Review blasting impact for any changes to design (e.g. charge size) and revise analysis. Also consider applying NPC-119 methodology for consistency with criteria
- Review Year 0 impact, before pit begins construction, to consider worst-case impact for operations
- General review of Project changes and identify any significant noise source changes (e.g. increased truck volumes, relocation of facilities) to see if noise impacts may have changed

TRAFFIC

- Original EIS assessed the preferred access road option of Camp Road 19
 - Traffic Impact Study (TIS) was undertaken in 2012
 - Alternatives were assessed as part of the EIS
- Two potential access points are being reviewed as part of the EIS Addendum: the original Camp Road 19 and an alternative between Highway 17 and the existing Airport Intersection



12:00pm to 12:45pm

TRAFFIC

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- For the EIS Addendum, no additional baseline work is required if Camp Road 19 remains as preferred alternative:
 - TIS to be updated with new counts
 - Previous recommendations will need to be reviewed against new design standards
 - Some highway improvements already completed
- Additional work could be required if the alternate option near Airport access is carried forward to EIS addendum

12:00pm to 12:45pm

- The Socio-Economic Baseline:
 - Community and regional economy, employment and business
 - Community and regional infrastructure and services
 - Socio-economic data requires updating:
 - Baseline data in the Socio-Economic Baseline Report and EIS
 - The macroeconomic analysis

- Changing Regulatory and Public Concerns:
 - There is increasing regulatory and public interest in the positive effects of the Project and Generation PGM's enhancement initiatives/policies/practices designed to deliver them

- How our Workplan Addresses these Changes:
 - Update primary and secondary socio-economic baseline data
 - Liaise with communities to confirm current data
 - Update the macroeconomic analysis
 - Address changes to project activities (e.g. employment, traffic, accommodations)
 - Work with Generation PGM to identify practical enhancement initiatives/policies/practices and incorporate them in the effects assessment

Summary of Baseline

To date two archaeological assessment reports have been completed:

- 2008 – Stage I and II Archaeological Assessment of the Marathon PGM Property, North of Marathon Ontario
- 2009 – Stage 1 and 2 Archaeological Assessment of Hare Lake and Hare Creek North of Marathon, McCoy Township, Ontario

Impact Assessment and Regulatory Changes

- Project footprint understood not to be disturbing new areas. (Exception would be alternate road corridor, if pursued)
- Project no longer includes areas around Bamooos or Hare lakes so the areas of high potential identified there should not be impacted.
- Original archaeological assessments completed under the 1993 *Archaeological Assessment Technical Guidelines* are understood to be grandfathered for this Project.

Proposed Workplans

- Follow up with MHSTCI to document acceptance of previous Stage 1 and Stage 2 archaeological assessments under the EIS Guidelines.
- No additional footprint disturbance is proposed at this time and therefore no additional archaeological assessment is proposed.

- In October 2012 the Ministry of Tourism, Culture, and Sport (now the Ministry of Heritage, Sport, Tourism, and Culture Industries [MHSTCI]) advised that a heritage professional be retained to evaluate the potential for built heritage resources and cultural heritage landscapes within the study area
- The first step in this process is completion of a desktop survey
- As directed in federal guidelines established in 2012, the MHSTCI framework will be followed and the MHSTCI Criteria for Evaluation of Potential for Built Heritage Resources and Cultural Heritage Landscapes will be completed

- The desktop research and consultation with regulatory agencies will inform the Checklist which will identify the presence of indicators of cultural heritage value or interest (CHVI)
- If indicators of potential CHVI are identified through the Checklist exercise, a Cultural Heritage Assessment Report is required
- If the Checklist does not identify indicators of potential CHVI, a summary of the findings will be prepared for the EIS Addendum and no additional work will be required in keeping with 2012 federal guidelines

PAUSE FOR DISCUSSIONS

1:30pm to 1:50pm

Topics for discussion:

- Air
- Noise and Vibration
- Traffic
- Socio-Economic
- Archaeology
- Culture & Built Heritage

Key Take A Ways:

1. Begin conversations – discipline contacts
2. Regular collaboration & feedback
3. Confirm everyone in agreement with workplans – if not follow-up and confirm
4. EA conceptual design to demonstrate compliance – save details for permitting

Questions?

Key Technical and process contact: Tabatha LeBlanc, Gen-PGM Sustainability Manager at tleblanc@genpgm.com or 204 444 3959

1:50pm to 2:00pm

Marathon Palladium Project

REVIEW PANEL PROCESS



Impact Assessment
Agency of Canada

Agence d'évaluation
d'impact du Canada

Canada

Impact Assessment Agency of Canada

- Formerly the Canadian Environmental Assessment Agency (CEAA)
- Delivers federal EAs and IAs pursuant to the Impact Assessment Act (IAA), which came into force on August 28, 2019, replacing the *Canadian Environmental Assessment Act, 2012* (CEAA, 2012).
- The Impact Assessment Agency (the Agency) is leading the assessment. Discussions are underway with the province of Ontario to establish a Joint Review Panel.
- The Marathon Palladium Project (the Project) will continue to be assessed under CEAA 2012. The IAA's transition provisions allow projects undergoing an environmental assessments by review panel to continue under the former act.
 - As per the transition provision described in subsection 183 of the IAA: *“Any environmental assessment of a designated project referred to a review panel under section 38 of the 2012 Act before the day on which this Act comes into force is continued under the 2012 Act as if that Act had not been repealed.”*



History/Background

- October 2010: Project was referred to review panel due to the potential for the Project to cause significant adverse environmental effects
- August 9, 2011: The Joint Review Panel (the Panel) was established with Ontario
- July 2012: The Environmental Impact Statement (EIS) was submitted to the Panel. The Panel conducted its review of the EIS from July 2012 to December 2013, at which time the Panel determined it had sufficient information to proceed to a public hearing
- December 17, 2013: Public hearing was announced
- January 30, 2014: Proponent requested suspension of EA
- January 31, 2014: The Panel requested additional information from the Proponent and the regulatory clock was paused
- October 31, 2014: Joint Review Panel was disbanded and the EA was placed on hold



Resuming the EA

- On July 13, 2020, the Proponent advised the Agency that it plans on submitting updated studies as early as December 2020. Response to the Panel's Information Request (IR) is anticipated in the 1st quarter of 2021. Within the IR, the Panel requested the Proponent describe if the updated feasibility study will have implications on the evaluation of the significance of any residual adverse effects.
- The Agency plans to have a new Review Panel in place prior to the submission of new information in order to allow the necessary time to review the current material on the public registry.
- The regulatory clock currently remains paused, and 181 calendar days remain for a panel to complete the review. The remaining steps of the review include:
 - Reviewing the updated EIS and studies;
 - Reviewing the response to the former Panel's IR;
 - Conducting a public comment period;
 - Conducting a public hearing; and
 - Writing the report.
- The Minister has the authority to extend the timeline for the review by 90 days, under section 54(3) of CEAA 2012.



Participant Funding

- Prior to the EA process being placed on hold, 6 Indigenous groups and 5 Non-governmental Organizations (NGOs) received funding. The Agency will continue to fund the participation of these groups if they intend to continue their participation in the process.
- The Agency will also invite public and Indigenous groups to apply for funding. New applications will be accepted to participate in the review of the new information, participate in the public hearing and review the draft conditions.

Groups who have received funding:

Indigenous Groups	NGOs
Métis Nation of Ontario	Citizens for Responsible Industry in Northwestern Ontario
Ontario Coalition of Aboriginal People	Environment North
Biigtigong Nishnaabeg (Ojibways of Pic River No. 50) First Nation	MiningWatch Canada
Pic Moberg First Nation	Northwatch Coalition for Environmental Protection
Red Sky Métis Independent Nation	The Federation of Ontario Naturalists
Pays Plat First Nation	



Consultation

There are 6 Indigenous groups being consulted by the Agency in collaboration with the Government of Ontario:

- Biigtigong Nishnaabeg (Ojibway of the Pic River First Nation)
- Pic Mobert First Nation
- Pays Plat First Nation
- Red Sky Métis Independent Nation
- Ontario Coalition of Aboriginal People
- Métis Nation of Ontario

The list of Indigenous groups to be consulted is currently being re-visited, however, no changes are anticipated at this juncture.



Crown Consultation Coordinator

The Role of the Impact Assessment Agency of Canada's Crown Consultation Coordinator includes but is not limited to:

- Consults Indigenous groups throughout the assessment process
- Collaborates with Indigenous groups on the assessment of impacts on rights
- Co-author the Crown Consultation and Accommodation Report to be presented to the Minister to inform decision making
- Coordinates federal departments involvement in consultation activities
- Coordinates with province in consultation activities
- Administers the Indigenous Funding Program
- Represents the Crown in its legal duty to consult, NOT part of the JRP Secretariat
- Upon request from the Review Panel, provides information on the record to inform their analysis and recommendations



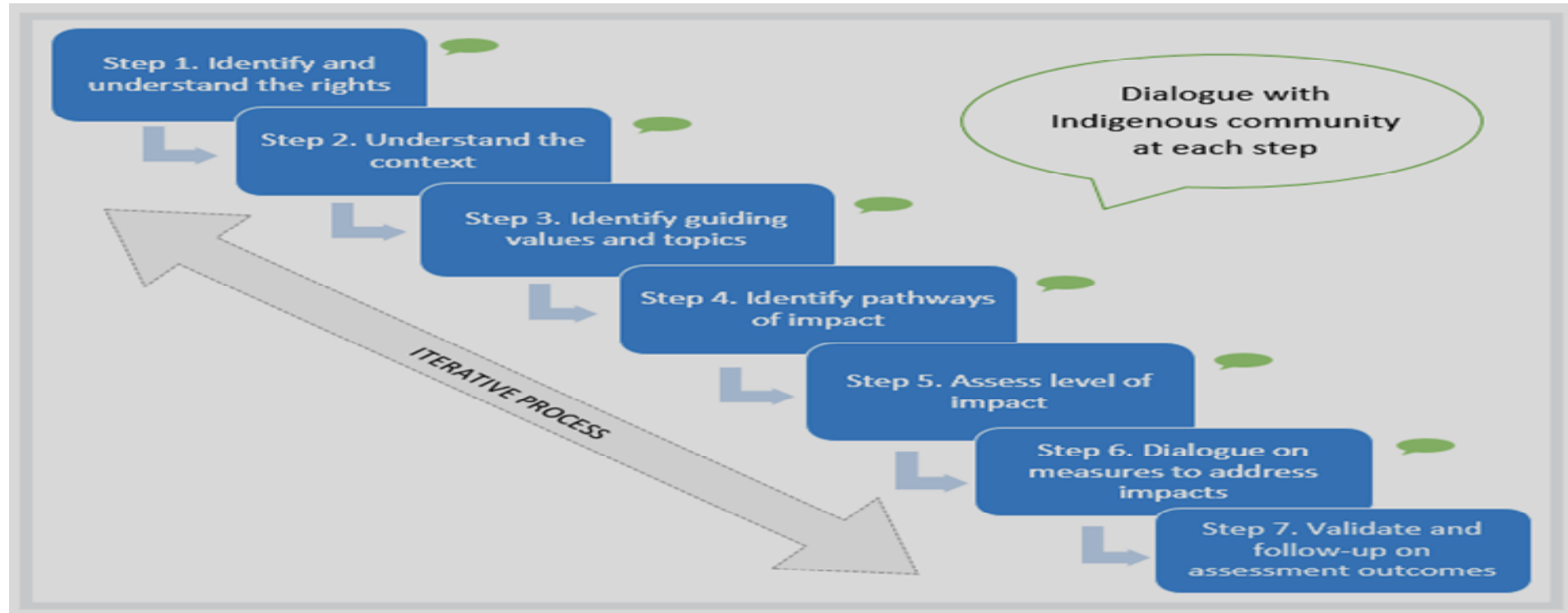
Updated Consultation Activities

	Consultation activities in the Joint Review Panel Process
Phase I	Initial engagement and consultation on the updated draft Joint Review Panel Agreement including Terms of Reference and Ontario's draft Harmonization Order
Phase II	Review of proponent's updated technical studies, prepare for Joint Review Panel process leading to hearings
Phase III	Hearings and preliminary assessment of impacts on rights
Phase IV	Consultation on the Joint Review Panel EA Report, conditions for a federal Decision Statement, and finalization of Crown Consultation and Accommodation Report.
Phase V	Federal and provincial regulatory permitting

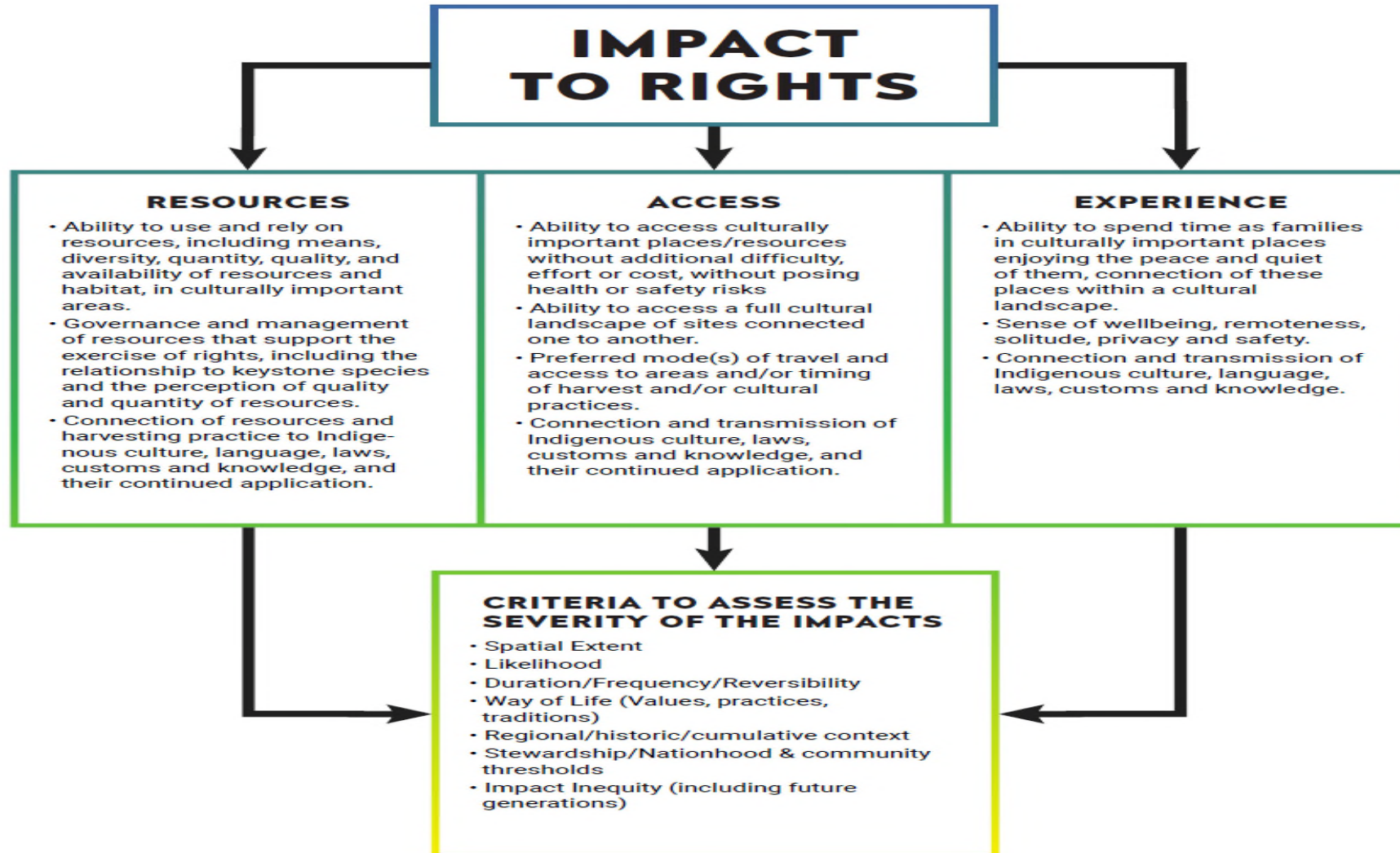


Agency Guidance – Assessment of Impacts on Rights

The Assessment of Impact on the rights of Indigenous peoples can be broken down into seven steps.



Methodology to Assess Severity of Impacts on Rights



Consultation – Next Steps

- Virtual meetings continue
- Possibility of face-to-face meetings with Indigenous groups in the Fall
- Awaiting recommendations for Review Panel members from Indigenous groups
- Consult Indigenous groups on updated Joint Review Panel Terms of Reference, Harmonization Agreement, updated technical studies as these become public documents
- Share *Interim Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples* and other guiding documents with Indigenous groups to begin discussions
- Prepare information packages to assist Indigenous groups participation in resumption of assessment process





Registry

To access all documents on the public record for the Marathon Palladium Project, please visit: <https://iaac-aeic.gc.ca/050/evaluations/exploration?projDocs=54755>

Any new information submitted to the new Review Panel will be made available at the same link.



Immediate Next Steps

- The Agency and Ontario are in discussions regarding the creation of a Joint Review Panel
- Hold a public comment period on the amended draft Terms of Reference for the Review Panel.
- Proposed changes to the Joint Review Panel Agreement:
 - Amendments to the Agreement and the Terms of Reference are being proposed to reflect the modifications to EA practices and terminology e.g. Indigenous vs. Aboriginal
 - Amendments will also focus on the next steps in the review process
- Appointment of a new Review Panel by the Minister of Environment and Climate Change
 - Appointments would be made in consultation with Ontario, if required
- Announce the availability of participant funding



Next Steps: Review of Updated Studies

- The Review Panel may request that federal authorities, having specialist information or knowledge with respect to the Project, make that information or knowledge available to the Review Panel. Federal authorities can provide information to the Review Panel via:
 - Public comment periods;
 - Public Hearing related submissions; and
 - Anytime requested by the Review Panel.
- Once submitted to the Review Panel, the updated studies will be placed on the Public Registry and will be made available for public comment for a minimum of 60 days. The Review Panel will request written comments from Indigenous groups, the public, governments and other interested parties on the sufficiency of the information as measured against the EIS Guidelines and on the technical merit of the information.
- Within 30 days of the completion of the public review of the updated studies, the Joint Review Panel, taking into consideration the comments and any information requests received and its own review of the updated studies, will determine if the EIS contains sufficient information to proceed to a public hearing.



Next Steps: Public Hearing

- Notice of Public Hearing
 - A minimum of 45 days notice shall be provided prior to the start of the public hearing
- The public hearing is usually held in communities most affected by the Project
- The former Panel developed procedures for the conduct of the public hearing, which are on the public registry. The new Panel may choose to amend these procedures
- Best efforts to complete the hearing within 30 days



Next Steps: Panel Report

- The newly appointed Review Panel will prepare and submit a report to the Minister of Environment and Climate Change and, if required, the provincial Minister of the Environment including:
 - Description of the joint review panel process
 - The rationale, conclusions and recommendations of the Panel
 - Any mitigation measures and follow-up programs required
 - Summary of the views of interveners and Indigenous groups
- Report to be submitted within 90 days after close of the public hearing.
- The Agency shall have the executive summary translated into Indigenous languages, upon request.



Next Steps: Federal Government Decision

- The federal Minister decides whether adverse environmental effects are likely to be significant
- If the Minister's decision is that the project is likely to cause significant adverse environmental effects, the matter is referred to the Governor in Council (Cabinet) who will decide if the likely significant adverse environmental effects are justified in the circumstances
- The federal Minister issues the environmental assessment decision statement with enforceable conditions, coordinated with the provincial decision statement, as required.





Agency Contact

Marathon Palladium Project
Impact Assessment Agency of Canada
Telephone: 613-957-0700
Email: iaac.marathonminereview-examenminemarathon.aeic@canada.ca





Questions?



Works and Operation department achieves goals and objectives despite COVID-19

Despite the fact that the COVID-19 pandemic has affected the town's works and operations department, Works and Operations Manager Brian Hyshka told council Monday the staff was still able to accomplish significant goals and objectives.

He said the waste transfer station was closed between March 17 to April 14 but residents were encouraged to utilize curbside pickup, bag tags were available on line and delivered by the bylaw officer. Landfill total volume for 2020 is forecast to be 10 - 15 per cent higher than in 2019.

"Our water operations are on track for full compliance including drinking water quality requirements and all audits, mandatory meetings and strategy sessions have been completed as prescribed. The recent leak repair on Stevens Avenue was responsible for 30 per cent of total volume."

Hyshka said the 2020 resurfacing project planned and engineered for Nicolet and Steedman was withdrawn from the final budget due to priority funding allocated to other higher priorities.

"A major component of the storm water system had failed on Yawkey Avenue and our staff excavated and replaced the pipe and the pavement will be replaced prior to Oct. 31," he said. "Woodson and Winton Streets resurfacing was recently approved by council and Provost Contracting will start the work in the coming days with completion scheduled for

Oct. 31."

Hyshka said the Peninsula Golf Course clubhouse cleanup was contracted through the insurance company and carried out by works and operations staff and equipment. The site was remediated and temporary facilities were turned over to recreation programming in just under eight days.

"The arena compressor failure delayed the opening of summer ice program but the arena will be back in operation shortly with compressor delivery and installation anticipated by the end of September," he said. "The Port Hole Pool was closed March 17 and, since that time, the annual maintenance program has been completed including a compressor replacement for the small pool Dry-O-Thon."

Hyshka told council local parks were reopened in July and all equipment was tested by qualified playground inspectors and cleaned by high pressure steam prior to the opening date to ensure maximum safety for users.

"Staff has remained highly productive as we implemented safety protocols for their protection and to enable continuance of service," he said. "Crews worked split shifts, break areas were segregated, transportation was reshuffled to keep workers safely apart including golf carts and side - by - sides for park staff. We anticipate further training of staff on snow removal equipment to enable more versatility this coming winter."

Scouts looking at expanding the lodge

(Con't from Page 1.)
to be used underneath the lodge. He also continued to cut up 10 foot beams for our use. Seth and I levelled off the lodge and then repaired the roofline," he said. "We're milling the wood now into slabs that we will use for new siding on the lodge."

Jim said the Scouts will have to look at expanding the lodge to meet the regulations required for both male and female Scouts.

"The lodge, as it is, can accommodate 20 - 30 people but we plan on a 10 foot by 20 foot expansion at the back of the lodge and another one added to the side of the lodge," he said. "We have all the wood we need for the expansions but our next steps will be to get a few work parties organized and out to do some clean up, work on the siding and roof, replace the doors and general work like that."

The Boy Scout camp, about 9.5 acres in total, can be reached

by driving in the road to the Marathon Rod and Gun Club and then take the first right to the boat launch.

"As proven by the past, the lodge is crucial to the success of Scouting in Marathon," he said. "Being out there allows us to do a number of things with the Scouts such as canoeing, developing outdoor skills, hiking and a host of other activities that will help our Scouts develop and grow. And the amazing thing is, we can do all of these things over a weekend. It really is an attractive program."

Jim said he thinks Scouting can be revived in Marathon.

"We have some great leaders with lots of experience and our emphasis is always on doing things correctly in a safe and healthy environment."

He said the Scouts will soon have details on an Open House to inform people of the program, the facility and lodge.



Sinkhole causes detour at bottom of Stevens Avenue

Residents were faced with a detour since about 9:30am last Saturday morning as they were faced with a detour at the bottom part of Stevens Avenue just in front of the Marathon Bowling Lanes in Lakeview Community Centre. Works and Operations Manager Brian Hyshka said Monday the sinkhole was caused by a failure of the 1 meter dia stormwater pipe. Water was going to ground through the rusted out bottom and eventually created a cavity. The road base aggregate sank to fill in the cavity under the pipe. 100 meters of pipe and one lane of pavement will be replaced. With the ongoing work of also replacing the pavement on Winton and Woodson Streets, motorists are asked to avoid this area, until work is completed.

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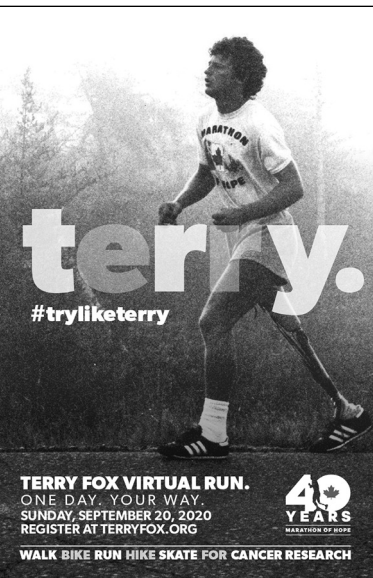
Generation PGM Inc. is excited to announce the restart of the Environmental Assessment (EA) for the **Marathon Palladium Project**. The Project footprint is largely unchanged from the 2014 design, and current optimizations within that footprint are being explored for the Project.

Although traditional indoor town hall meetings are not an option currently during the pandemic, we are available to answer your questions regarding the Project, design, timelines, and EA process.

Our Main Office in Marathon at 90 Peninsula Road will be open for drop-ins on September 22nd from 9:00 am to 12:00 pm and September 23rd from 3:00 pm to 6:00 pm. We will host similar sessions outside of Lands Resources Building in Biigtigong Nishnaabeg, September 22nd from 3:00 pm to 6:00 pm and September 23rd from 9:00 am to 12:00 pm.

Social distancing will be respected, and everyone attending is asked to wear masks. We have also begun posting updates on our visitors' booth outside our Main Office at 90 Peninsula Road in Marathon. Alternatively, if you have questions please email at:

comments@genpgm.com



CRISES RESPONSE SERVICE

Thunder Bay District Crisis

Response Service - Call toll free 1-888-269-3100, 24 hours a day, 7 days a week.



SPADONI MOTORS MARATHON

2 ONTARIO ST. SUITE 1 | MARATHON, ON | P0T 2E0
CALL: 807.229.3330 | EMAIL: SPADONIMARATHON@SHAW.CA
WEBSITE: WWW.SPADONIMOTORS.CA
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MARATHON SALES & RENTAL CONSULTANT
CONTACT DAYNA AT 807.229.3330
FOR YOUR SALES & RENTAL NEEDS TODAY!



NEW HOURS

Effective Tuesday, September 8th

12 Noon to 9:00 pm

Monday to Sunday



Michael Gravelle, MPP
Thunder Bay-Superior North



Thank you for doing your part and stopping the spread of COVID-19.
Please do not let your guard down and hang in there!

All the best,
Michael

179 S. Algoma St., Thunder Bay Ontario P7B 3C1

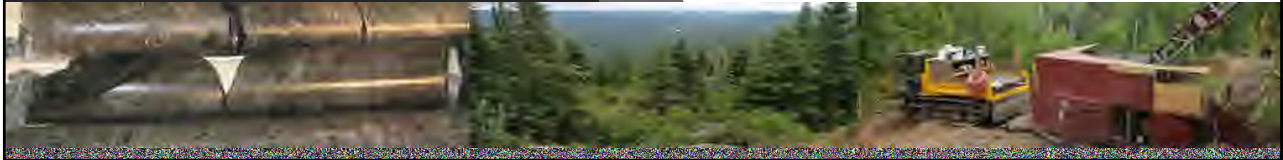
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GENERATION PGM

October 2020 - UPDATE

MARATHON PALLADIUM PROJECT



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GENERATION PGM

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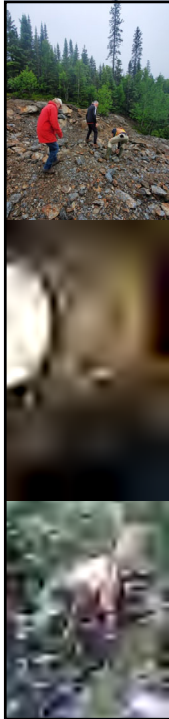
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AGENDA

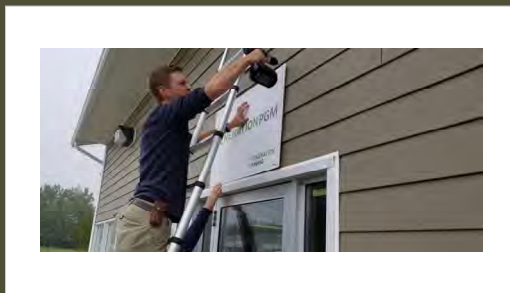
- Who is Generation PGM Inc.
- Need for the Project
- Project Description
- Schedule
- Environmental Assessment Through a Joint Review Panel
- Future Together



3

INTRODUCTION

- Generation PGM Inc. (GenPGM) is a subsidiary of Generation Mining Limited
- Experienced management team with backgrounds in building, development and operations
- With interests in platinum group metals (PGM), specifically the Marathon Palladium Project
- Most advanced palladium project in North America



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NEED FOR THE MARATHON PALLADIUM PROJECT

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Palladium: Ontario's Supply Advantage

Palladium's market value has greatly appreciated due to its critical role in auto manufacturing and vehicle exhaust systems, where it helps transform poisonous gases into less toxic and harmful outputs

- I. Insufficient global palladium supply exists
- II. Canada's platinum-group metals (including palladium) are concentrated Northern Ontario
- III. Expanding palladium production could revitalize Northern Ontario's economy

Marathon Project represents a vital strategic asset for a competitive Ontario economy and instrumental in the transition towards renewable energy and green technologies

Copper: Essential to Vital Technology

Copper is a key metal for many innovative technologies and a necessary component in the production of electric vehicles



Electric Vehicles

A reliable supply of copper will be vital to the success of the recently announced upgrade to Ford's Oakville EV plant



Telecomm



Industrial Tech



LED lightbulbs



Smart Grids

5

5

PALLADIUM MARKET

- Palladium and Copper are considered "green metals"
- Palladium and Platinum are used in catalytic converters, which effectively clean exhaust gas into less hazardous substances such as carbon dioxide, water vapor, and nitrogen gas
- Copper used for plumbing, electrical wiring and significant use in batteries and continued electrification of the future
- Palladium, Platinum and Copper are also key components in computer hard drives, circuit boards and computer chips



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PROJECT OVERVIEW

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- The open pit ore will be processed (crushed, ground and concentrated) at an on-site processing facility.
- Final concentrates containing Palladium and Copper will be transported off-site via road and/or rail to a smelter and refinery for extraction and purification
- Site construction will take 18 to 24 months
- Construction workforce will require +900 workers with an average of approximately 450 to 500 people
- Production is estimated to begin late 2023
- Operating workforce estimated at +450 people
- The mine has been designed to ensure that the environment will be protected with specific attention to water and air

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VALUE ADDED IMPROVEMENTS

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Improved Water Management

- Process Plant, primary crusher, truck shop, offices and fuel farm moved out of Pic River watershed
- Site access road realigned to cross fewer streams
- Storm Water Pond (SWP) added for risk management and protection of Pic River watershed
- SWP used to collect stormwater runoff and improve management of site water

Reduce Greenhouse Gas and Understand the Carbon Footprint

- Mine Operation design to minimize fuel usage with the location of the primary crusher
- Evaluating Trolley Assist (electrical assistance for haul trucks) for key haulage segments
- Power efficient equipment included in the Processing Plant design
- Evaluating CO₂ capture in construction concrete and possibly processed solids

Mine Rock Storage Area (MRSA)

- Includes storage of mine rock into pit(s)
- Similar footprint to past designs, less impact to sub-watersheds
- 85-90% of Mine Rock is Type 1 (not acid generating)
- Good quality waste rock can be used for aggregate – business opportunity

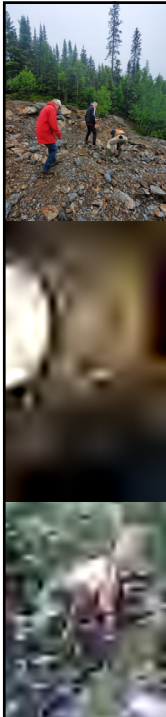
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Process Solids Management Facility (PSMF)

- We heard from communities → *limited* desire to have final discharge from PSMF to: Pic River, Bamooos Lake, Lake Superior and Angler Creek/Stream 6 as such... these have been **excluded**
- Hare Lake was selected as the preferred discharge location, based on feedback from communities
- Improved water management onsite and in PSMF
- +90% of water will be recycled in the process plant
- Excess water will be treated as required and discharged
- Discharge effluent will achieve required water quality objectives at end of pipe
- Discharge will be protective of fish and fish habitat

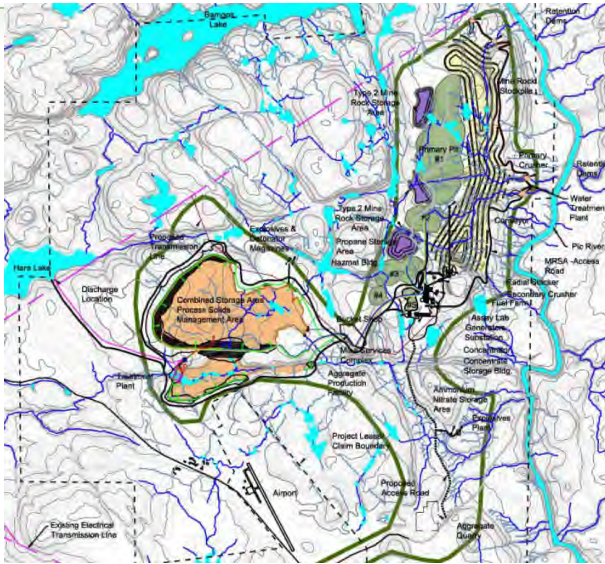
OVERVIEW OF KEY DESIGN UPDATES



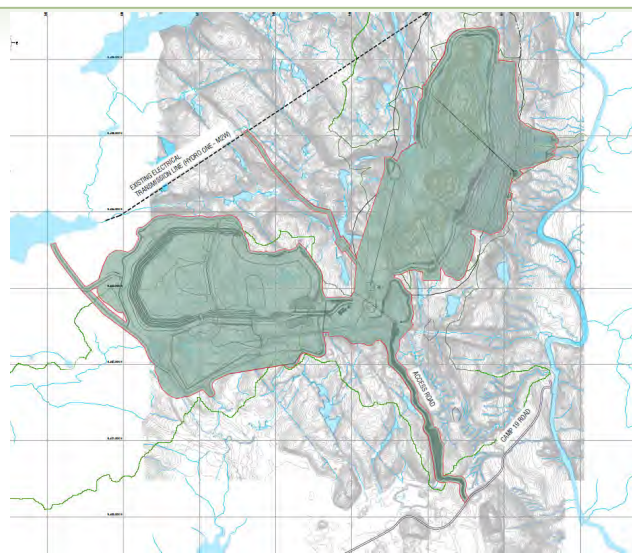
Topic	2014	2020
Average Process Rate	22,000 tonnes per day	~25,200 tonnes per day
Open Pit	One primary and four satellite pits	Three Pits: North, Central and South
Mine Life	11.5 years	~12.6 years
Process Solids Management Facility (PSMF)	Located west of open pits, final elevation to 375 m above sea level (asl)	Similar footprint west of pits, elevation 380 m asl
Mine Rock Storage Area (MRSA)	East of open pits	Slightly smaller footprint, using mined-out pits for storage of mine rock
Process Plant and Primary Crusher	Southeast of open pits	West of open pits, now centrally located away from Pic River

2014 PROJECT VERSUS 2020 OPTIMIZED DESIGN

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2014 Project Design



2020 Project Design

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PROJECT STATUS

- In September 2019, confirmed the Project would continue Environmental Assessment under Canadian Environmental Assessment Act (CEA Act 2012)
- A Preliminary Economic Assessment (PEA) was completed in January 2020 – the Project is Feasible.
- The Environmental Assessment (EA) for the Project was restarted in July 2020, picking up from the point at which it was paused in 2014
- Field studies conducted end of May to August: result of new regulatory requirements and to build on previous baseline studies
- Some studies carried on continuously since 2014: terrestrial, water quality and flows.
- The Joint Review Panel is being facilitated through the Harmonization Order, integrating both provincial and federal EA requirements.
- Submission of updated EA documents will be completed in a staggered submission before the Panel is appointed to give public and communities time to complete their review.



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MARATHON PALLADIUM PROJECT TIMELINE

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	2019	2020	2021	2022	2023
Asset Acquisition	█				
Update Resource	█				
PEA Study	█	█			
Feasibility Study		█	█		
EA / Permitting / Social Approvals		█	█	█	
Construction				█	█
Production					█

* Important note: Construction and production are subject to favorable results in the feasibility study, permitting and financing of the project.

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ENVIRONMENTAL ASSESSMENT

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- The importance of this process is to consider the effects on ecosystem, and mitigate and/or eliminate any negative effects on the environment and communities
- Gen PGM is dedicated to protecting the Valued Ecosystem Components (VECs)
- Key elements include: management of water, protecting wildlife, vegetation, species at risk, and Indigenous and Community considerations
- Surveys conducted within the Project footprint to analyze possible effects
 - Birds, mammals, insects, plants
 - Groundwater and surface water
 - Air quality monitoring
 - Aquatic life



- - Project boundary
- - Project study area
- - Provincial Park
- - International Joint Commission Area of Concern (Peninsula Harbour)

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FUTURE TOGETHER

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- Gen PGM will continue to play an active role in supporting local community initiatives and services.
- The Project will bring economic benefits to local and regional communities and Indigenous communities along the north shore of Lake Superior, including:
 - Increased economic and business opportunities
 - Increased direct and indirect and induced employment during all phase of the Project
 - Increase labour incomes in local communities
 - Increased government revenues for all levels of government

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TRANSFORMING COMMUNITIES, TRANSFORMING MARKETS

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Local Jobs and Youth Retention

- 350 – 400** Full time, permanent jobs generated, with most of these roles held by residents and community partners 
- 3.75** Estimated employment multiplier.* Every mining job created spurs nearly four downstream jobs in nearby industries 
- +** Significant financial benefits, business and employment opportunities for Indigenous communities through agreements 
- 12+** Years in expected life of the palladium mine, sustaining jobs, retaining local youth, and spurring residual economic activity

The Marathon palladium mine will be a vital investment in the recovery of the Northern Ontario economy following the COVID-19 economic crisis.

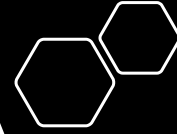
This project will create good-paying jobs, while stimulating local industries and promoting the retention of local youth and talent.

*University of Toronto. ("Ontario Mining: A partner in prosperity building")

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More Information on the Project can be found at
www.genmining.com
and the Impact Assessment Registry at
<https://iaac-aeic.gc.ca/050/evaluations/proj/54755?culture=en-CA>

**If you have additional questions,
please email us at comments@genpgm.com**