

Hardrock Project

Current Use of Lands and Resources for Traditional Purposes – Follow-Up Plan

HP-GGM-EV-130-0046

August 18, 2020

| Date | Rev | Status | | Prepared By | Checked By | Approved By |
|-----------|-----|--------|------------|----------------|----------------------|----------------------|
| 18-Aug-20 | 0 | IFU | Signature: | N/A | <Original signed by> | <Original signed by> |
| | | | Name: | SLR Consulting | Meghan Bertenshaw | Shane Hayes |

| Document Revision History | | | |
|---------------------------|-----------------|----------------|------------|
| Rev. | Date | Description | Originator |
| 0 | August 18, 2020 | Issued for Use | |
| | | | |
| | | | |

Table of Contents

| | | |
|-----|----------------------------------|---|
| 1 | Introduction | 1 |
| 1.1 | Mine Overview | 1 |
| 1.2 | Project Location | 1 |
| 1.3 | Purpose and Scope | 2 |
| 2 | Roles and Responsibilities | 4 |
| 3 | Follow-Up Program..... | 4 |
| 3.1 | Monitoring | 5 |
| 4 | Reporting..... | 7 |
| 4.1 | Record Keeping | 7 |
| 4.2 | Annual Report Submissions..... | 7 |
| 4.3 | Plan Review and Updates | 7 |

List of Tables

| | |
|--|---|
| Table 3-1: Roles and Responsibilities for the Current Use Plan | 4 |
| Table 4-1: Monitoring Program Details | 6 |

List of Figures

| | |
|-----------------------|---|
| Figure 1-1: Site Plan | 3 |
|-----------------------|---|

1 Introduction

Greenstone Gold Mines GP Inc. (GGM) proposes to construct, operate and ultimately decommission/close a new open pit gold mine, process plant, and associated ancillary facilities, collectively known as the Hardrock Project (the Project).

The Project's Environmental Impact Statement/Environmental Assessment (EIS/EA) was approved by the federal Minister of the Environment, as outlined in the Decision Statement issued under Section 54 of the Canadian Environmental Assessment Act, 2012 (Decision Statement, dated December 10, 2018), and by the provincial Ministry of the Environment, Conservation and Parks, as outlined in the Notice of Approval to Proceed with the Undertaking (Notice of Approval, dated March 12, 2019).

1.1 Mine Overview

The Hardrock deposit will be mined as an open pit. The process plant will operate 365 days per year with a Life of Mine (LOM) of approximately 15 years. Mill throughput will range from 24,000 tonnes per day (tpd) increasing to 30,000 tpd as conditions warrant.

The overall Project development schedule will consist of the following main phases, during which various Project activities will be completed:

- Construction: Years -3 to -1 with early ore stockpiling commencing after the first year of construction;
- Operation: Years 1 to 15, with Year 1 representing a transition from construction to operation; and,
- Closure: Years 16 to 20 for Active Closure and Years 21 to 36 for Post-Closure.

Key mine components of the Project development area (PDA) are an open pit, waste rock storage areas, overburden storage areas, ore stockpile, ore crushing and mill feed ore storage activities, process plant, water management facilities, tailings management facility, power plant and associated infrastructure, and explosives facility. Ancillary Project components are buildings, service water supply and associated infrastructure, sewage and effluent treatment plants, site roads, watercourse crossings, realignments, and habitat compensation/offsets, onsite pipelines and piping, fuel and hazardous materials storage, aggregate sources, and temporary camp. Existing infrastructure currently located within the PDA will be relocated, including a portion of Highway 11, a Ministry of Transportation Patrol Yard, and Hydro One Networks Inc. facilities. Refer to Figure 1-1 for the current mine site plan.

1.2 Project Location

The Project is located in northwestern Ontario, approximately 275 kilometers (km) northeast of Thunder Bay, in the Municipality of Greenstone, Ward of Geraldton. The Project is generally centered at the intersection of Highway 11 and Michael Power Boulevard. Highway 11 currently traverses the Project property in an east-west direction.

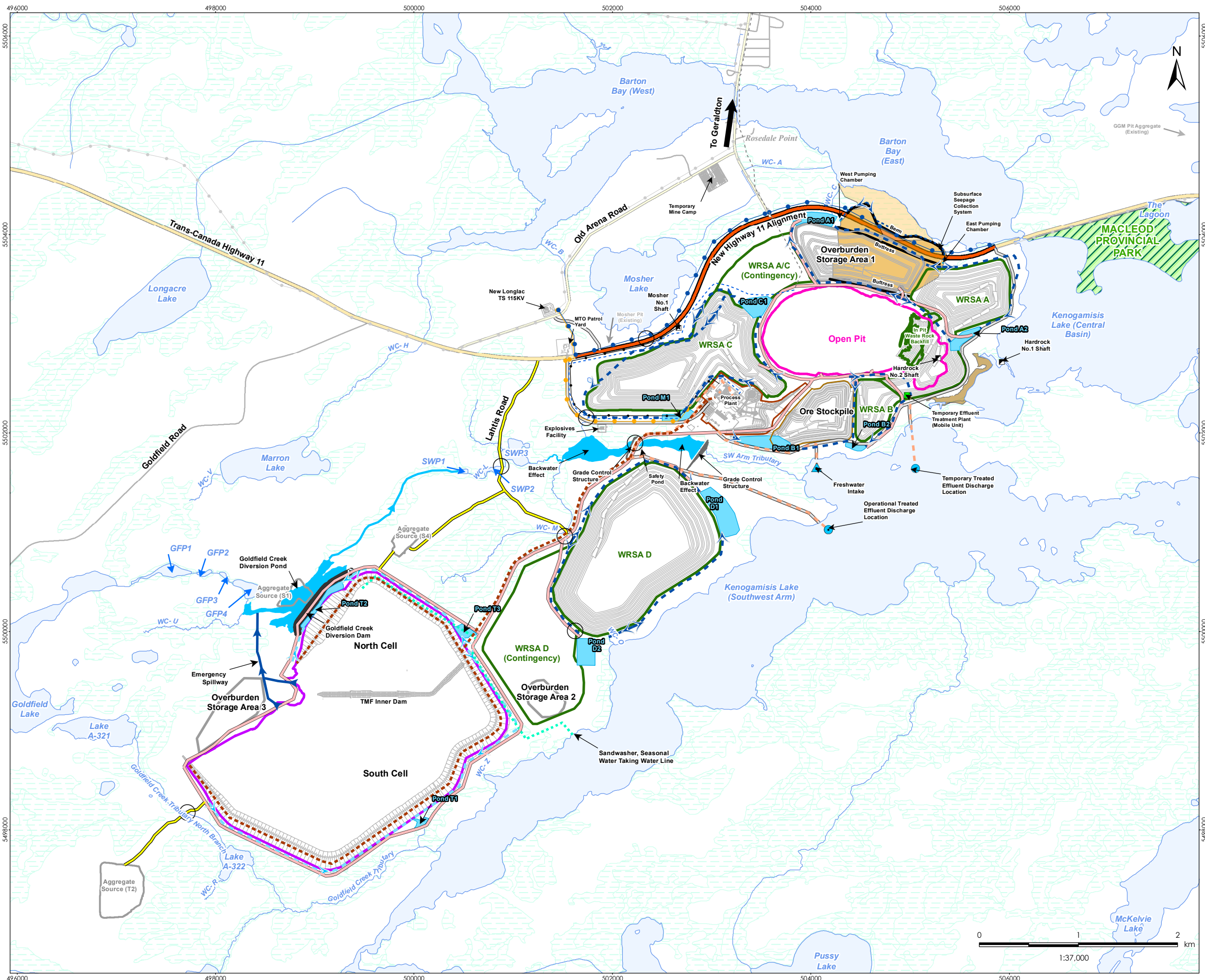
The Project site consists of a contiguous block of patented claims, leases, licenses of occupation and staked claims held by GGM.

1.3 Purpose and Scope

The Current Use of Lands and Resources for Traditional Purposes Follow-Up Plan (Current Use Plan) has been developed to satisfy Condition 6.9 of the federal Decision Statement:

Develop, prior to construction and in consultation with Indigenous groups, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of mitigation measures as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes, including access to the Southwest Arm of Kenogamisis Lake referred to in condition 6.1 and access along Goldfield Road and to the Goldfield Creek diversion channel referred to in condition 6.2. The Proponent shall implement the follow-up program during all phases of the Designated Project.

Indigenous groups are defined in the Decision statement (1.18) as: Animbiigoo Zaagiigan Anishinaabek (AZA), Aroland First Nation (AFN), Ginoogaming First Nation (GFN), Long Lake #58 First Nation (LL58), and Métis Nation of Ontario (MNO). In addition, the Provincial Notice of Approval identifies Red Sky Métis Nation of Ontario (RSMIN) as an Indigenous Community.



Legend

| | |
|---|------------------------------------|
| Preliminary Site Plan | Highway Realignment |
| ● Discharge Location | — New Highway 11 Alignment |
| ■ Existing Mine Shaft | |
| ▲ Freshwater Intake | Existing Features* |
| ■ Temporary Effluent Treatment Plant | — Highway |
| ○ Watercrossing | — Major Road |
| — Access Road | — Local Road |
| — Construction Access Road | — Existing Power Line |
| — Diversion Channel | — Existing Potable Water Pipeline |
| — Emergency Spillways | — Watercourse |
| — Haul Road | — Provincial Park |
| — Potable Water Pipeline | — Waterbody |
| — Pipeline (Intake and Discharge) | — Wetland (Eco-Site Based) |
| — 44 kV Distribution Line | Historical Tailings Areas |
| — 12.5 kV Distribution Line | — Historical Hardrock Tailings |
| — 115 kV Transmission Line | — Historical MacLeod High Tailings |
| — Seepage Collection Ditch | — Historical MacLeod Low Tailings |
| — Subsurface Seepage Collection System | |
| — Contact Water Collection Ditch | |
| — Tailings Pipeline and 13.8 kV Distribution Line | |
| — Water Line | |
| — Aggregate Source | |
| — Collection Ponds | |
| — Open Pit - Full Extent | |
| — Ore Stockpile | |
| — Process Plant Area | |
| — Tailings Management Facility | |
| — Waste Rock Storage Area | |

Notes

1. Coordinate System: NAD 1983 UTM Zone 16N
2. Base features produced under license with the Ontario Ministry of Natural Resources © Queen's Printer for Ontario, 2013.

* Existing Features have been removed in the PDA and do not reflect current conditions.

May 2019
160961223

Client/Project
Greenstone Gold Mines GP Inc. (GGM)
Hardrock Project

Figure No.
1

Title
Site Plan

\\C:\1220-102\work_group\01\609\active\609\60845\drawing\XDX\AFC\Report\Figures\Design_Optimization\160961223_Fig_1_2_OptimizedSitePlan_20190516.mxd
 Revised: 2019-05-17 By: pwcresell

3 Roles and Responsibilities

The roles and responsibilities for key GGM staff responsible for implementing the Current Use Plan is provided in Table 3-1.

Table 3-1: Roles and Responsibilities for the Current Use Plan

| Title or Position | Key Responsibilities |
|---|--|
| Director, Environment and Community Relations | <ul style="list-style-type: none"> Oversee implementation of the Current Use Plan to facilitate compliance with the plan and environmental permits, regulations, commitments and best practices. |
| Community Planning Liaison | <ul style="list-style-type: none"> Work with Environment Superintendent to implement the Current Use Plan and related processes. Coordinate Indigenous Relations team members and tracking and reporting on communications related to current use. |
| Superintendent, Environment | <ul style="list-style-type: none"> Participate in EACs with Indigenous groups. Share results of follow-up and monitoring programs with Indigenous group EACs. |
| Environmental Advisory Committees (EAC) | <ul style="list-style-type: none"> Review and provide input into the Current Use Plan during development in consultation with communities and input on adaptive management. |
| Environmental Monitors | <ul style="list-style-type: none"> Participate in the monitoring activities at site as directed by the Superintendent, Environment. Share information and obtain community feedback and relaying to the EAC and GGM for discussion. |

4 Follow-Up Program

As specified in Condition 6.1 of the federal Decision Statement:

“The Proponent shall establish, in consultation with Indigenous groups and prior to undertaking construction activities that will restrict access to the Southwest Arm of Kenogamisis Lake, alternate unrestricted access to the Southwest Arm of Kenogamisis Lake and shall maintain that alternate access during all phases of the Designated Project, to the extent that such access is safe”.

In follow up to a commitment made in the EIS/EA, GGM has included a public access road from Highway 11 along the east side of the PDA to maintain access to the Southwest Arm of Kenogamisis Lake (see Figure 1-1). This EA commitment outcome was documented in the Outcome of Detailed Engineering Design Optimization Report (April 30, 2019). The Optimization Report was circulated to Indigenous groups and no concerns were identified.

As specified in Condition 6.2 of the federal Decision Statement:

“The Proponent shall maintain unrestricted access along Goldfield Road during all phases of the Designated Project and to the Goldfield Creek diversion channel starting when the

Proponent has completed progressive reclamation referred to in condition 4.2 and until the end of decommissioning, to the extent that such access is safe”.

Goldfield Road is located outside of the PDA and no effects on Goldfield Road access are anticipated as a result of the Project.

For the Goldfield Creek diversion channel, the main access point of Lahtis Road will be closed during construction and operation due to safety reasons (EIS/EA, Chapter 16). Signage will be posted by GGM around the perimeter of the PDA, including the shoreline of Kenogamisis Lake, to alert local land and resource users of the presence of the Project. At Closure, Lahtis Road is planned to be re-opened to public traffic up to the point of the Goldfield Creek diversion (Closure Plan, Section 9.7 and 11.1). GGM will work with the Indigenous groups via their respective EACs to determine more precisely when Lahtis Road will be re-opened. During construction and operations, GGM will facilitate site tours for representatives of the Indigenous groups to access the Goldfield Creek diversion channel to observe its establishment and progress.

4.1 Monitoring

GGM is committed to ongoing dialogue with Indigenous groups with respect to monitoring Project effects on current use for traditional purposes throughout all Project phases. GGM’s Communications Plan, Community-Specific Consultation Plans and agreements established with the Indigenous groups will guide the manner in which GGM will carry out its work.

In consultation with Indigenous groups, GGM has developed procedures for Indigenous groups to communicate their concerns about adverse environmental effects caused by the Project related to access to and use of lands for traditional purposes. GGM has also developed procedures to document and respond in a timely manner to any concerns received and demonstrate how issues have been addressed.

Environmental Monitors and EACs are key mechanisms for communications related to the Current Use Plan, including verifying the accuracy of the environmental assessment and determine the effectiveness of mitigation measures. The committees include members from local Indigenous groups and meetings are held regularly. The committees review relevant Project documentation and the meetings provide a forum for community representatives and GGM to discuss environment and community related matters and collaborate to resolve concerns and recommendations. The Environmental Monitors, having a key role in liaising back to their respective communities and advising GGM and the EAC of feedback from their membership, are well-positioned to inform how the implementation of Project mitigation measures for access are working and if concerns need to be addressed.

GGM and the Indigenous groups will work collaboratively on the follow-up program development and implementation:

- GGM will lead the sharing of information related to alternate unrestricted access to the Southwest Arm of Kenogamisis Lake, Goldfield Road and the Goldfield Creek Diversion Channel. For example, GGM will keep the EACs informed on progress made with the development of the east access road and date for when it will be open to the public.

- Environmental Monitors for the Indigenous groups will lead the collection and sharing of feedback from community members with GGM related to current use of land. The monitoring program approach will be adaptive and depend on areas of interest identified with Indigenous groups, which may change over time.

Table 4-1 outlines the parameters, methodology, location, frequency, timing and duration of monitoring associated with the follow-up program.

Table 4-1: Monitoring Program Details

| Performance Objective | Monitoring Parameter | Method | Location | Frequency | Timing | Duration |
|--|---|---|----------|------------------------|----------------|--|
| Accessibility to the Southwest Arm of Kenogamisis Lake | User inputs on ability to access Southwest Arm of Kenogamisis Lake | <ul style="list-style-type: none"> • Environmental Monitors will be responsible for obtaining community feedback/concern. These will be discussed at EAC meetings. | PDA/LAA | Continuou s/ ad-hoc | Year- round | All project phases |
| Unrestricted access to the use of Goldfield Road | User inputs on ability to access Goldfield Road | <ul style="list-style-type: none"> • Environmental Monitors will be responsible for obtaining community feedback/concern. These will be discussed at EAC meetings | LAA | Continuou s/ ad-hoc | Year- round | All project phases |
| Unrestricted access to the Goldfield Creek diversion channel | User inputs on ability to use Lahtis Road to access the Diversion Channel | <ul style="list-style-type: none"> • Environmental Monitors will be responsible for obtaining community feedback/concern. These will be discussed at EAC meetings | PDA | Continuou s/ ad-hoc | Year- round | Closure (note Lahtis road will be closed during constructi on and operations due to safety reasons) |

5 Reporting

5.1 Record Keeping

Records of consultation, information sharing, and agreements with Indigenous groups related to the Current Use Plan, including development and implementation of the Plan, will be maintained by GGM in accordance with the Project's record keeping protocols.

5.2 Annual Report Submissions

Annual compliance reporting will include an update on the follow-up plan, including annual results and any changes or additional information. Information deemed sensitive or confidential by GGM and Indigenous groups would be omitted from annual reports, for example reports or details related to community-specific agreements.

5.3 Plan Review and Updates

The Current Use Plan is a living document and may require updates as a result of on-site conditions, changes to mitigation strategies, new information or feedback from Indigenous groups, or other changes as agreed upon by GGM and Indigenous communities. Updates to the Plan will be made as the Project progresses, at minimum annually, in consultation with Indigenous groups to reflect the Project development status, priorities and goals.

The updated Plan will be provided to the Impact Assessment Agency (previously the Canadian Environmental Assessment Agency) and Indigenous groups as per Federal Condition 2.6, within 30 days of the follow-up program being updated.

The results of the Current Use monitoring program will be reviewed with Indigenous groups via the EACs as needed based on feedback received.