


**Valentine Gold Project: Annual
Report for the Federal
Environmental Assessment: 2022
Reporting Period**



Marathon Gold Corporation
36 Lombard Street
Suite 600
Toronto, ON M5C 2X3

March 2023

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Version No.	Revised By	Date Issued
0.0		
Impact Assessment Agency of Canada Registry Reference Number: 80169		

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Table of Contents

ABBREVIATIONS VI

EXECUTIVE SUMMARY – ENGLISH.....	IX
EXECUTIVE SUMMARY – FRENCH.....	X
1.0 INTRODUCTION	1
2.0 REPORT SCOPE AND REQUIREMENTS	3
3.0 PROJECT UPDATE	5
3.1 ENVIRONMENT	5
3.2 CONSTRUCTION.....	6
4.0 APPROACH TO COMPLIANCE	7
5.0 CONSULTATION AND ENGAGEMENT	9
5.1 OVERVIEW.....	9
5.2 COMMUNITIES.....	10
5.3 FISH AND WILDLIFE ASSOCIATIONS/ ENGOS	11
5.4 INDIGENOUS GROUPS	12
5.4.1 Overview	12
5.4.2 Cultural Awareness Training	14
5.4.3 Physical and Cultural Heritage and Structure, Site or Thing of Historical, Archaeological, Paleontological or Architectural Significance.....	14
6.0 FOLLOW-UP PROGRAMS	16
6.1 FISH AND FISH HABITAT FOLLOW-UP MONITORING PROGRAM.....	17
6.1.1 Program Overview	17
6.1.2 2022 Program Results.....	17
6.1.3 Additional Mitigation Measures.....	18
6.2 ACID ROCK DRAINAGE AND METAL LEACHING MANAGEMENT PLAN	18
6.2.1 Plan Overview	19
6.2.2 2022 Program Results.....	20
6.2.3 Additional Mitigation Measures.....	20
6.3 AVIFAUNA FOLLOW-UP MONITORING PROGRAM	20
6.3.1 Program Overview	21
6.3.2 2022 Program Results.....	21
6.3.3 Additional Mitigation Measures.....	21
6.4 HEALTH OF INDIGENOUS PEOPLES	21
6.4.1 Ambient Air Quality Follow-up Monitoring Program	22

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023


6.4.2	Surface Water Follow-up Monitoring Program (SWFMP) Program.....	22
6.4.3	Groundwater Follow-up Monitoring Program	23
6.4.4	Country Foods Follow-up Monitoring Program	23
7.0	PLANS	25
7.1	OFFSETTING PLAN	25
7.1.1	Plan Overview	25
7.1.2	Plan Updates	26
7.2	WATER MANAGEMENT PLAN.....	26
7.2.1	Plan Overview	27
7.2.2	Plan Updates	27
7.3	FISH RESCUE PLAN	27
7.3.1	Plan Overview	27
7.3.2	Plan Updates	28
7.4	CURRENT USE OF LANDS AND RESOURCES FOR TRADITIONAL PURPOSES INDIGENOUS COMMUNICATIONS PLAN	28
7.4.1	Plan Overview	29
7.4.2	2022 Activities	30
7.4.3	Plan Updates	30
7.5	CARIBOU PROTECTION AND ENVIRONMENTAL EFFECTS MONITORING PROGRAM.....	30
7.5.1	Program Overview	30
7.5.2	2022 Program Results.....	31
7.5.3	Plan Updates	31
7.6	ACCIDENTS AND MALFUNCTIONS PREVENTION AND RESPONSE PLAN	31
7.6.1	Plan Overview	32
7.6.2	Plan Updates	32
8.0	ADDITIONAL FOLLOW-UP PROGRAMS AND PLANS.....	33
9.0	REFERENCES	36

LIST OF TABLES

Table 2-1	Annual Report Information Requirements and Marathon Concordance	3
Table 5-1	Summary of Conditions Containing Consultation and Engagement Requirements.....	9
Table 8-1	Summary of Additional Follow-up Monitoring Programs and Plans.....	34

LIST OF FIGURES

Figure 1-1	Project Location	2
------------	------------------------	---

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

LIST OF APPENDICES

APPENDIX A CONDITION IMPLEMENTATION ACTIVITIES.....A-1

APPENDIX B INDIGENOUS ENGAGEMENT SUMMARYB-1

APPENDIX C CONSTRUCTION SCHEDULE.....C-1

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Abbreviations

AAQFMP	Ambient Air Quality Follow-up Monitoring Program
AFMP	Avifauna Follow-up Monitoring Program
AMPRP	Accidents and Malfunctions Prevention and Response Plan
ARD	Acid Rock Drainage
ARD/MLMP	Acid Rock Drainage and Metal Leaching Management Plan
BACT	Best Available Control Technology
BIC	Benthic Invertebrate Community
CEAA	Canadian Environmental Assessment Act
CFFMP	Country Foods Follow-up Monitoring Program
COSEWIC	Committee on the Status of Endangered Wildlife in Canada
CPEEMP	Caribou Protection and Environmental Effects Monitoring Plan
CSQG	Canadian Sediment Quality Guideline
CWQG FAL	Canadian Water Quality Guidelines for the Protection of Freshwater Aquatic Life
CWQG PAL	Canadian Water Quality Guidelines for the Protection of Aquatic Life
CWS	Canadian Wildlife Services
DFO	Fisheries and Oceans Canada
EA	Environmental Assessment
ECCC	Environment and Climate Change Canada
ECWSR	Environmental Control Water and Sewage Regulations
EEM	Environmental Effects Monitoring
EIS	Environmental Impact Statement
ENGO	Environmental Non-governmental Organizations
EPFI	Equator Principles Financial Institutions
EPP	Environmental Protection Plan
EPA	Environmental Protection Act
ERMA	Environment Resources Management Association
ERP	Emergency Response Plan
ESG	Environmental Social Governance

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

ESMS	Environmental and Social Management System
ESSR	Environment, Sustainability and Social Responsibility
FDP	Final Discharge Point
FFHMP	Fish and Fish Habitat Follow-up Monitoring Program
FRP	Fish Rescue Plan
GFMP	Groundwater Follow-up Monitoring Program
GHG	Greenhouse Gas
GHGEFMP	Greenhouse Gas Emissions Follow-up Monitoring Program
GWFMP	Groundwater Follow-up Monitoring Program
HADD	Harmful Alteration, Disruption or Destruction
HGO	High Grade Ore
HHERA	Human Health and Ecological Risk Assessment
HHRA	Health Hazard Risk Assessment
IAAC	Impact Assessment Agency of Canada
ICMI	International Cyanide Management Institute
IFC	International Finance Corporation
IR	Information Requirements
ISO	International Organization for Standardization
ISQG	Interim Sediment Quality Guideline
km	Kilometre
LGO	Low Grade Ore
LOM	Life of Mine
MAC	Mining Association of Canada
MDMER	Metal and Diamond Mining Effluent Regulations
MFN	Miawpukek First Nation
ML	Metal Leaching
MOU	Memorandum of Understanding
NFMP	Noise Follow-up Monitoring Program
NGO	Non-Governmental Organization

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

NL	Newfoundland and Labrador
NLDECC	Newfoundland Department of Environment and Climate Change
NLDECCM	Newfoundland Department of Environment, Climate Change and Municipalities
NLDFFA	Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture
NL DIET	Newfoundland and Labrador Department of Industry, Energy and Technology
NLOA	Newfoundland and Labrador Outfitters Association
NMFMP	Noise Monitoring Follow-up Monitoring Program
OEEMP	Outfitters Environmental Effects Monitoring Plan
OWFMP	Other Wildlife Follow-up Monitoring Program
PAG	Potentially Acid Generating
PEL	Probable Effects Limit
PM	Particulate Matter
QFN	Qalipu Mi'kmaq First Nation
RAA	Regional Assessment Area
SAR	Species at Risk
SEA	Socio-Economic Agreement
SEM	Sikumit Environmental Management Limited
SOCC	Species of Conservation Concern
SOP	Standard Operation Procedure
SWFMP	Surface Water Follow-up Monitoring Program
TMF	Tailings Management Facility
TOC	Total Organic Carbon
tpd	Tonnes per day
TMP	Traffic Management Plan
TSM	Towards Sustainable Mining
WMP	Water Management Plan
WRMD	Water Resources Management Division
WSER	Wastewater Systems Effluent Regulations
WWTP	Sanitary Wastewater Treatment Plant

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Executive Summary – English

Marathon Gold Corporation (Marathon) commenced construction of Valentine Gold Project (the Project) in October 2022. The Project will consist of two open pits associated with the Leprechaun and Marathon gold deposits. The Project is in a rural region of Newfoundland and Labrador (NL) with the nearest communities of Millertown and Buchans, located approximately 49 km and 60 km straight-line distance from the mine site, respectively.

The Project has undergone assessment for potential environmental and social impacts. As per the federal and provincial Environmental Assessment (EA) process and requirements, Marathon submitted an Environmental Impact Statement (EIS) to the Impact Assessment Agency of Canada (IAAC) and the Newfoundland and Labrador Department of Environment, Climate Change and Municipalities (NLDECCM) in September 2020, for review and approval. The Project was released from provincial EA on March 17, 2022, and the Decision Statement was issued by the Federal Minister of Environment and Climate Change Canada (ECCC) on August 23, 2022.

Following the EA process, Marathon’s Environment, Sustainability and Social Responsibility (ESSR) Team focused on regulatory consultation (for permits, approvals, and authorizations) and engagement with stakeholders including Indigenous groups, Qalipu Mi’kmaq First Nation (Qalipu) and Miawpukek First Nation (Miawpukek). The engagement process was guided by Marathon’s stakeholder engagement strategy developed to ensure that those whose interests may be affected by the Project, are appropriately informed and meaningfully engaged regarding the company’s ongoing and planned activities.

Through engagement with Qalipu and Miawpukek, and consultation with regulatory agencies (e.g., Fisheries and Oceans Canada, Environment and Climate Change Canada), management plans and follow-up monitoring programs, designed to guide implementation of Project commitments, were developed and finalized. The associated monitoring programs were implemented, as appropriate, based on the program schedule and the time of year.

This report describes activities undertaken by Marathon to comply with each of the Conditions of the Decision Statement during the reporting period of August 23, 2022, through December 31, 2022, and to fulfill annual reporting requirements as outlined under Condition 2.10 of the Decision Statement.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Executive Summary – French

La société minière Marathon Gold Corporation (Marathon) réalise actuellement le projet aurifère Valentine (le projet) dans le centre de l'île de Terre-Neuve (T.-N.-L.). Le projet comprendra deux fosses d'exploitation à ciel ouvert, associées aux gisements aurifères Leprechaun et Marathon. Le projet se trouve dans une région rurale dont les deux collectivités les plus proches sont Millertown et Buchans, situées respectivement à une distance de 49 km et de 60 km en ligne droite par rapport à la mine.

Le projet a fait l'objet d'un programme exhaustif d'évaluation pour en déterminer les incidences sur le plan environnemental et social. Conformément aux exigences fédérales et provinciales en matière d'évaluation environnementale (EE), à l'automne 2020, Marathon a soumis un Énoncé d'impact environnemental (EIE) à l'examen et à l'approbation de l'Agence d'évaluation d'impact du Canada (AEIC), du ministère de l'Environnement et du Changement climatique de Terre-Neuve. Le 17 mars 2022, le projet a ultérieurement été dégagé des formalités d'évaluation environnementale (MECCTNL, 2022) et le 23 août 2022, le ministre fédéral de l'Environnement et du Changement climatique (ECCC) a publié une déclaration de décision.

Parallèlement aux formalités d'évaluation environnementale et après les formalités connexes, l'équipe responsable des questions de responsabilité environnementale, du développement durable et de responsabilité sociale de Marathon a principalement travaillé sur la consultation de la réglementation en vigueur (permis, approbations et autorisations) et la mobilisation des collectivités, des intervenants et des groupes autochtones de la région, soient la Première Nation Qalipu (Qalipu) et la Première Nation Miawpukek (Miawpukek). La mobilisation a eu lieu sous l'égide de la stratégie de mobilisation de Marathon, élaborée pour garantir que les parties intéressées susceptibles de subir les incidences du projet soient bien informées et mobilisées comme il se doit en ce qui concerne les activités en cours et futures de la Société.

Par la mobilisation des Premières Nations Qalipu et Miawpukek et les consultations réalisées auprès des organismes de réglementation concernés (Pêches et Océans Canada, Environnement et Changement climatique Canada), des plans de gestion environnementale et des programmes de surveillance et de suivi ont été élaborés afin de guider la mise en œuvre des engagements pris au titre du projet et le respect des Conditions afférentes en vertu de la réglementation. Les programmes de surveillance connexes ont été ou seront mis en œuvre au besoin, selon le calendrier de réalisation du projet.

Ce rapport contient de l'information de nature générale sur le projet, une mise à jour sur les activités du projet, ainsi qu'une description des activités précises réalisées par Marathon pour remplir chacune des Conditions figurant dans la déclaration de décision pour la période concernée comprise entre le 23 août 2022 et le 31 décembre 2022. Ce rapport est présenté à l'AEIC conformément aux exigences de compte rendu annuel, comme il est stipulé dans la Condition 2.10 de la déclaration de décision.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

1.0 INTRODUCTION

Marathon Gold Corporation (Marathon) is developing an open pit gold mine near Valentine Lake in central Newfoundland (Figure 1-1). The main components of the proposed Valentine Gold Project (the Project) include two open pits, waste rock piles, crushing and stockpiling areas, conventional milling and processing facilities (the process plant), a tailings management facility (TMF), personnel accommodations, and supporting infrastructure including roads, explosives storage facility, on-site power lines, buildings, and water and effluent management facilities. The mine site will encompass an approximate footprint of 2,130 ha, not including the site access road.

The Project is located in a rural region, with a history of mining exploration and development activities and other land and resource uses, including commercial forestry, hydroelectric developments, outfitting, and recreational land use. The mine site is accessed by an existing public access, gravel road that extends approximately 88 kilometres (km) south from Millertown to Marathon’s existing exploration camp. Marathon will upgrade and maintain the access road from a turnoff approximately 8 km southwest of Millertown to the mine site (i.e., a distance of approximately 76 km).

The complete construction of the Project is expected to take place over a period of approximately 2 years, with an estimated life of mine (LOM) of 17 years, including construction and closure. Upon cessation of mining, the operation will be closed, and the site components will be rehabilitated and monitored in accordance with applicable regulations at the time of closure.

An Environmental Assessment (EA) was completed for the Project under the *Canadian Environmental Assessment Act, 2012 (CEAA 2012)* and the Newfoundland and Labrador *Environmental Protection Act (EPA 2002)*. Marathon submitted an Environmental Impact Statement (EIS) for the Project to the Impact Assessment Agency of Canada (IAAC) on September 29, 2020, and to the Environmental Assessment Division of the Newfoundland and Labrador Department of Environment and Climate Change (NLDECC) on November 3, 2020. In response to comments received from both levels of government during the EA review process, amendments to the EIS were submitted to the NLDECC and responses to Information Requirements were submitted to IAAC.

The Project was released from provincial EA on March 17, 2022 (NLDECC, 2022) and a Decision Statement was issued by the Federal Minister of Environment and Climate Change Canada (ECCC) on August 23, 2022.

This report has been prepared to fulfill the annual reporting requirements as outlined under Condition 2.10 of the Decision Statement issued by the Federal Minister of ECCC. The report describes activities undertaken by Marathon to comply with each of the Conditions in the Decision Statement during the 2022 reporting period (August 23, 2022, to December 31, 2022).

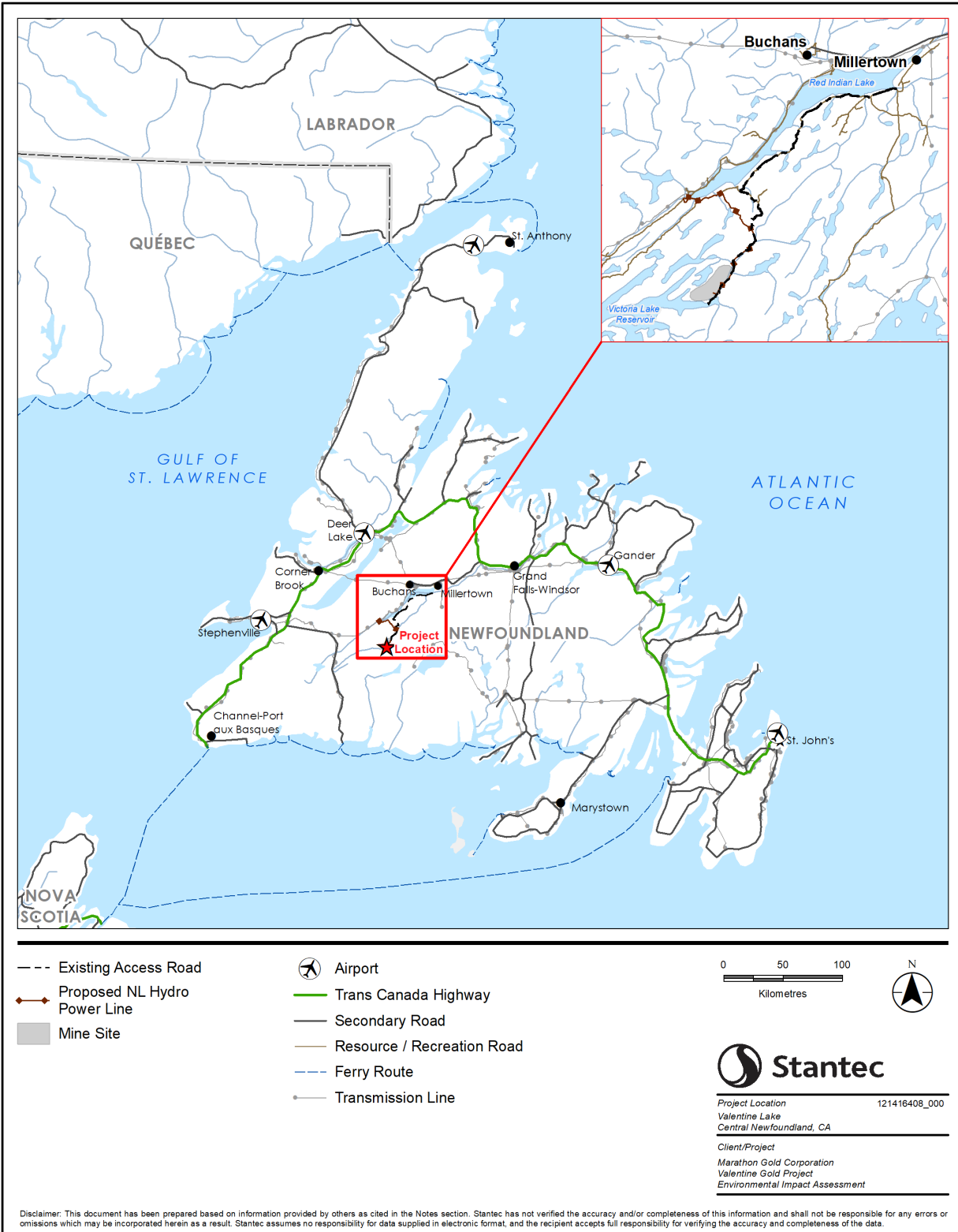


Figure 1-1 Project Location

2.0 REPORT SCOPE AND REQUIREMENTS

The scope of this *Valentine Gold Project: Annual Report for the Federal Environmental Assessment: 2022 Reporting Period* (Annual Report) is to provide details on how Marathon complied with Conditions of the Decision Statement issued under Section 54 of CEAA, 2012. This report covers the Project activities undertaken by Marathon during the period from August 23, 2022, through December 31, 2022 (herein referred to as the “reporting period”). Where required to provide context, activities from January 1, 2022, to December 31, 2022, will be included. The start of the reporting period is defined in Condition 2.12:

The first reporting year for which the Proponent shall prepare an annual report pursuant to Condition 2.10 shall start on the day the Minister of the Environment issues the Decision Statement pursuant to subsection 54 (1) of the Canadian Environmental Assessment Act, 2012.

Condition 2.10 of the Decision Statement outlines the Annual Report information requirements for the Project. Table 2-1 outlines the section references within this document that demonstrate concordance with these requirements.

Table 2-1 Annual Report Information Requirements and Marathon Concordance

Condition	Location of Information
2.10: The Proponent shall prepare an annual report that sets out, for each reporting year:	
<i>2.10.1: the activities undertaken by the Proponent to comply with each of the Conditions set out in this Decision Statement;</i>	Appendix A presents a list of all the Decision Statement conditions and describes the activities taken by Marathon in the reporting period to comply with each Condition.
<i>2.10.2: how the Proponent complied with Condition 2.1;</i>	In addition to Appendix A, further information is provided in Section 4 (Approach to Compliance Management).
<i>2.10.3: for Conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation;</i>	In addition to Appendix A, further information is provided in Section 5 (Consultation and Engagement) and Appendix B (Indigenous Engagement Summary).

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

<p><i>2.10.4: the information referred to in Conditions 2.5 for each follow-up program and any update to that information made pursuant to Condition 2.6;</i></p>	<p>In addition to Appendix A, further information is provided in Section 6 (Follow-Up Programs) and Appendix B.</p>
<p><i>2.10.5: the results of the follow-up program requirements identified in Conditions 3.17, 3.18, 4.8, 4.9 and 6.1;</i></p>	<p>In addition to Appendix A, further information is provided in Section 6 (Follow-Up Programs).</p>
<p><i>2.10.6: for any plan that is a requirement of a Condition set out in this Decision Statement, any update(s) to the plan that have been made during the reporting year; and</i></p>	<p>In addition to Appendix A, further information is provided in Section 7 (Plans).</p>
<p><i>2.10.7: any modified or additional mitigation measure implemented or proposed to be implemented by the Proponent, as determined pursuant to Condition 2.8.</i></p>	<p>In addition to Appendix A, further information is provided in Section 6 (Follow-Up Programs).</p>

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

3.0 PROJECT UPDATE

This section provides a brief overview of various activities related to the Project that took place during the reporting period.

3.1 ENVIRONMENT

As noted in Section 1.0, the EA Federal Decision Statement was issued by the Federal Minister of ECCC August 23, 2022, and Marathon announced the Board of Directors' decision to proceed with Project construction, on September 1, 2022.

The focus, prior to and following the Decision Statement, was obtaining approvals required to initiate construction activities and the development of the Construction Environmental Protection Plan (EPP) and follow-up monitoring programs for implementation (as detailed in Section 6.0 and 7.0).

Consultation with federal regulatory agencies to date has been related to:

- The development of the Fish and Fish Habitat Follow-up Monitoring Program, the Fish Rescue Plan and the Offsetting Plan (Fisheries and Oceans Canada (DFO));
- The development of Air, Water, and Country Foods Follow-up Monitoring Programs related to the Health of Indigenous People (Health Canada, ECCC, DFO);
- The development of the Avifauna Follow-up Monitoring Program (ECCC Canadian Wildlife Services (CWS));
- The development of the Acid Rock Drainage and Metal Leaching Management Plan (ECCC, Natural Resources Canada, DFO);
- Letter of Advice for Repairs, Upgrades, and Placement of Culverts and Bridges along the Access and Haul Roads (DFO);
- The *Fisheries Act* Authorization for the dewatering of freshwater ponds for open pit mine development, changes in flow due to site water management and components thereof, and the placement of water intake and effluent pipes (DFO); and
- Approval Letter from NAV Canada on Marathon's Crane(s) and Blasting Zone(s) Land Use Submission.

Key provincial regulatory approvals obtained prior to and during the reporting period include the following:

- Consultation and approval of the Caribou Protection and Environmental Effects Monitoring Program (NL DFFA – Wildlife Division);
- Mining Lease (NL Department of Industry, Energy and Technology (NL DIET));
- Surface Lease (NL DIET);
- Approval of the Early Works Development and Rehabilitation & Closure Plan (NL DIET);
- Approval of the Construction Environmental Protection Plan (NL DECC);
- Early Works Certificate and Approval for Construction (NL DECC);

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

- Permit to Alter a Body of Water associated with Access Road and Site Road Culverts, Water Intake, and Wetland areas requiring infilling and dredging (NLDECC – Water Resources Management Division (WRMD)); and
- Water Use License for Water Withdrawal and Use from Victoria Lake for Industrial Purposes (WRMD).

3.2 CONSTRUCTION

The updated construction schedule is provided in Appendix C. Construction activities were initiated in October 2022, upon receipt of the required permits and completion of pre-construction Conditions of the provincial EA Release and federal Decision Statement, and included the following:

- The existing exploration camp was upgraded to 120 beds to serve as a temporary construction camp for the early construction activities until the permanent accommodations camp is completed;
- Tree clearing and grubbing of organics commenced for initial work areas (site roads, accommodations camp area, etc.);
- Site road construction to initial work areas including the Leprechaun pit and stockpiles, and process plant area;
- Initial mining equipment was delivered and assembled to support early development activities at the Leprechaun pit;
- On-site laydown areas (within the footprint of future site components) have been established along with a temporary fuelling station;
- An initial area of the Leprechaun pit was stripped of organics and overburden to permit the development (blast/load/haul) of construction rock for earthworks;
- Site access road upgrades, principally between the Victoria River Bridge and the Project site, including the replacement of the Victoria River Bridge, minor road realignments, ditching, and limited culvert replacement; and
- Clearing, grubbing, and development of the permanent accommodation camp pad (earthworks) was completed in 2022.

All initial construction activities included construction water management and environmental monitoring, where appropriate. Also, NL Hydro commenced construction of the Project's 40 km long 66 kV powerline between the Star Lake generating station and the Project site. This work is managed by NL Hydro and completed by their contractors under a separate EA and subsequent permit approvals.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

4.0 APPROACH TO COMPLIANCE

Marathon employed a careful and precautionary approach for the Project EA and Project planning and design phases, which has been carried into the Construction Phase, and will continue through all Phases and aspects of the Project. The same approach is employed to maintain compliance with regulatory requirements and commitments. This section outlines this approach to continued fulfillment of Condition 2.1:

The Proponent shall ensure that its actions in meeting the Conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge including community and Indigenous knowledge, available at the time the Proponent takes action, are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies.

Structure

To manage compliance, Marathon has developed a Project Commitment Register, that includes all Project commitments, and forms the basis for Marathon's Environmental and Social Management System (ESMS). Using a structured approach, actions are created to address each of the commitments, which are then incorporated into management plans or programs, implemented, and monitored. There is a check conducted on an annual basis to determine if the components (e.g., policies, plans, procedures, and resources) were sufficient to provide compliance with the Project commitments. Deficiencies or opportunities for improvement are addressed in support of continual improvement.

Team

Marathon employs a team of qualified individuals, supported by industry-leading leading consultants and subject matter experts from companies such as Stantec, Gemtec Consulting Engineers and Scientists Limited (Gemtec), Golder Associates (Golder), Sikumiut Environmental Management Ltd. (SEM), Ausenco Ltd. (Ausenco), SNC Lavalin and others, to develop mitigation measures and management plans, to design and implement the various follow-up and monitoring programs, and to undertake the detailed Project design. Field programs, studies, and engineering designs follow accepted and applicable standards and practices using recognized methods and models, which will lead to the construction and operation of a mine that complies with regulatory requirements and mitigates potential environmental effects. For Project construction, requirements outlined in the Conditions have been incorporated into contract specifications and drawings for implementation by the applicable contractors, who will be managed by Marathon and/or Marathon representatives and monitored for compliance throughout all Project phases.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Engagement and Consultation

Marathon has and will continue to consult with relevant authorities, and engage with Indigenous groups, stakeholders and the public to solicit input and is incorporating the information and knowledge gathered into the various measures, plans, and programs required by the Conditions. Marathon’s adaptive management approach will facilitate the identification and implementation of changes that may be required, based on ongoing consultation and engagement (in tandem with monitoring), to reduce adverse effects of the Project and will support continuous improvement.

Industry Standards

Marathon is a member of the Mining Association of Canada’s (MAC) and will implement the Towards Sustainable Mining (TSM) Standard Guiding Principles. TSM is framed around MAC performance assessments and a MAC letter-grade system ranging from C (no systems in place) to AAA (excellence and leadership is demonstrated and validated by external, independent assessments). The grades indicate performance within nine areas of sustainability, including Biodiversity Conservation Management, Climate Change, Indigenous and Community Relationships, Tailings Management Protocol, Water Stewardship, and Mine Closure Framework, among others.

Marathon is registered and in the process of becoming a signatory to the International Cyanide Management Institute (ICMI) as cyanide will be used to process gold. Marathon intends to implement the ICMI Principle and the associated Standards of Practice within each Principle.

Marathon’s ESMS and Climate Change Impacts Assessment meet requirements of the Equator Principles (EP4) risk management structure. The EP4 is used by financial institutions for determining, assessing, and managing environmental and social risk in projects. Equator Principles Financial Institutions (EPFIs) commit to implementing the Equator Principles in the policies, procedures and standards for financing projects and only provide Project Finance to projects that conform with the EP4. EP4 requires that the Projects classed as Category A (i.e., those with potential significant adverse environmental and social risks and/or impacts that are diverse, irreversible, or unprecedented) develop and maintain an ESMS.

The planning and design for the tailings management facility has been completed by an expert third party and independently peer-reviewed by an Independent Tailings Review Board, established in 2021. Marathon is committed to following the Canadian Dam Association’s Dam Safety Guidelines and the Mining Association of Canada’s Guide to the Management of Tailings Facilities over the life of the Project.

Technology

Marathon completed a Best Available Control Technology (BACT) assessment for inclusion in the EA submission to the NLDECC. The BACT assessment illustrated how Marathon considered the use of best available control technology in the design and planning of the Project and demonstrated how the *Management of Greenhouse Gas Regulations* BACT requirements will be met.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

5.0 CONSULTATION AND ENGAGEMENT

The Decision Statement includes multiple Conditions for which consultation and engagement is a requirement. A summary of these is presented in Table 5-1. This section provides a summary of Marathon's approach to consultation and engagement with emphasis upon the key activities undertaken with Indigenous groups during the reporting period as required by the relevant Decision Statement Conditions.

Table 5-1 Summary of Conditions Containing Consultation and Engagement Requirements

Topic	Conditions
General Conditions	2.1, 2.4
Fish and Fish Habitat	3.17
Acid Rock Drainage and Metal Leaching	3.15, 3.18
Migratory Birds	4.8
Health of Indigenous Peoples	6.1
Current Use of Lands and Resources for Traditional Purposes and Socio-economic Conditions	7.1, 7.2
Cultural Awareness Training	7.3
Physical and Cultural Heritage and Structure, Site or Thing of Historical, Archaeological, Paleontological or Architectural Significance	8.1, 8.2
Accidents and Malfunctions	10.2, 10.3, 10.4, 10.6

5.1 OVERVIEW

Consistent with its corporate values (Respect, Accountability, Transparency, Inclusion and Prosperity), Marathon is committed to ensuring that those whose interests may be affected by the Project, including Indigenous groups and stakeholders, are appropriately informed and meaningfully engaged regarding the company's ongoing and planned activities. Marathon's approach to engagement is set out in its Indigenous Relations Policy and Community Relations Policy, and is also informed by the Human Rights Policy and Diversity Policy located on the company [website](#).

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Marathon has developed and implemented a stakeholder engagement strategy. The list of stakeholders has been developed through stakeholder mapping and is intended to capture all external individuals, groups and organizations that may potentially be affected by the Project and is reviewed on an ongoing basis to ensure comprehensiveness.

The principal external stakeholders respecting the environmental aspects of the Project are included below.

- Communities (six communities in reasonable proximity to the Project) including local government institutions, residents, local businesses, and schools;
- Fish and Wildlife Associations, including the Newfoundland and Labrador Outfitters Association and Salmonid Associations (Atlantic Salmon Federation, Environment Resources Management Association (ERMA), Salmonid Association of Eastern Newfoundland, Salmonid Council of Newfoundland);
- Civil Society Organizations, including ENGOs; and
- Miawpukek First Nation (Miawpukek) and Qalipu Mi'kmaq First Nation (Qalipu), including Chief and Council, executive staff, membership, and business development associations.

The method and frequency of engagement adopted by Marathon depends upon the level, interest and influence of the specific stakeholder, consideration of stakeholder capacity, needs and interests, barriers to engagement, required resources to enable meaningful stakeholder participation and prior history with development.

Stakeholder engagement activities are tracked using customized software (NetBenefit). Records of stakeholder interactions, including meetings, phone calls, emails, and other communications are maintained to ensure that all issues and concerns are documented and that commitments to stakeholders are honored.

The sections that follow provide details of engagement activities with stakeholder groups with a focus on Indigenous groups.

5.2 COMMUNITIES

Since Project registration in 2019, Marathon has worked diligently to ensure that local communities and resident stakeholders are informed of the Project and have the opportunity to identify issues and express concerns. The objectives of community engagement are to ensure consistent, timely and ongoing dialogue with communities in order reduce any adverse effects of the Project and to maximize economic and social benefits for adjacent communities, provincial residents and businesses.

Focus has been placed on the six communities of interest located closest to the proposed Project site: the Towns of Buchans, Millertown, Badger, Grand-Falls Windsor and Bishop's Falls and the Local Service District of Buchans Junction.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Examples of key engagement activities with communities have included the following:

- Community Cooperation Agreements with the six communities of interest;
- Surveys and questionnaires to enable community residents and members of organizations to provide input and feedback following meetings and information sessions;
- Virtual and in-person public information sessions with local leadership and community residents to provide corporate and project updates, including information relating to the environmental assessment and permitting processes;
- Monthly meetings with local government leadership to provide updates and discuss issues of concern;
- Marathon’s representation on regional bodies such as the Central Health Community Advisory Committee and attendance at regional economic symposiums and conferences;
- Implementation of a Small Business Opportunities Expression of Interest Process to facilitate the development of local business capacity and enhance access to contracting opportunities;
- Regular and ongoing dissemination of employment and contracting opportunities;
- Provision of annual community financial allotments to promote community capacity, support infrastructure improvements and fund events; and
- Sponsorship of local recreational, cultural and community health and well-being initiatives.

As noted above, all engagement efforts are documented. As described in the Environmental Impact Statement, issues and concerns raised by communities have been considered in Project planning and execution and through regular engagement activities.

5.3 FISH AND WILDLIFE ASSOCIATIONS/ ENGOs

Fish and wildlife associations and environmental non-governmental organizations (ENGOs) which have a recreational, commercial, or environmental interest in natural resources in the Central Region of the province are stakeholders interested in or potentially affected by Marathon’s operations. Marathon has engaged with a range of salmonid associations, the Newfoundland and Labrador Outfitters Association (NLOA), and a number of environmental non-governmental organizations beginning in 2019 and continuing to the present day. Engagement efforts and activities are commensurate with the interest and influence of each group and are tailored to particular issues of concern. Such efforts have included the regular provision of Project-related information, meetings (both in-person and virtual) to provide Project updates and discuss issues of particular relevance to the specific organization, and, where appropriate, incorporation of feedback into Project planning, design and execution. For example, Marathon has met with representatives of salmonid associations to provide input into the design of mitigation and monitoring measures relating to fish and fish habitat.

Marathon has also concluded an Outfitters Environmental Effects Monitoring Plan (OEEMP) agreement with the NLOA which provides for ongoing engagement between Marathon and NLOA with respect to the monitoring of the potential effect of the Project upon caribou and other big game as well as other relevant environmental components. The OEEMP also provides a mechanism for compensation for outfitters

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

whose business activities have been directly affected by the Project. Pursuant to the terms of the OEEMP, Marathon and NLOA agree to work cooperatively over the life of the Project to ensure that any adverse effects of the Project upon outfitting activities are avoided or minimized. Marathon agrees to provide the NLOA with timely information respecting the progress of the Project, including any notices of Project-related activity such as road closures, snow clearing or other access-related matters which potentially could affect outfitter activities in the area. Such information may also include information related to Marathon’s environmental effects monitoring programs related to fish and wildlife, including caribou, which may impact outfitter activities.

5.4 INDIGENOUS GROUPS

As noted previously, the Decision Statement includes Conditions related to Indigenous consultation and engagement. This section will provide an overview of Marathon’s approach to Indigenous engagement and initiatives in relation to cultural awareness training, physical and cultural heritage, and structures, sites or things of historical, archaeological, paleontological or architectural significance.

Indigenous engagement pertaining to the development of specific follow-up programs and plans and compliance with Conditions is detailed in Appendix B.

5.4.1 OVERVIEW

Marathon acknowledges the unique culture and history of Indigenous peoples in NL and understands that they may have interests and concerns that differ from, or are in addition to, those of communities and other stakeholder groups. Marathon is committed to working constructively and in a spirit of good faith with Indigenous peoples to achieve mutually beneficial outcomes through the identification and management of environmental risks and opportunities and the successful participation of Indigenous persons in the employment and contracting opportunities associated with the Project. Marathon’s approach to Indigenous engagement is based upon the promotion of constructive and meaningful ongoing dialogue characterized by the following:

- Timely notification of Project related information and provision of reasonable opportunities to review and provide feedback;
- Respect for community protocols, cultural norms, and engagement preferences;
- Accessibility in terms of language, format, and technology;
- Transparency and flexibility;
- Adherence to commitments; and
- Mutual trust and good faith in communications.

The objectives of Indigenous engagement are as follows:

- To ensure that Indigenous groups are provided with opportunities to understand the Project and its potential impacts upon their interests;

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

- To enable Indigenous groups to provide feedback which will be considered in Project planning and execution;
- To provide a forum to discuss and respond to issues and concerns identified by Indigenous groups; and
- To establish positive and constructive relationships over the life of the Project.

Marathon’s engagement with Indigenous groups has focused upon two Indigenous groups with populations in proximity to the Project: Miawpukek and Qalipu. Marathon has worked with each group to develop a culturally appropriate and meaningful engagement process, considering their views as to the type, nature, and frequency of engagement. Since 2019, engagement has been based upon consistent and regular contact (in-person meetings, virtual meetings, conference calls, presentations) and information exchange designed to enable each group to understand the Project and identify potential effects on their communities, activities, and asserted or established Indigenous rights. Considerable efforts have been made to provide each Indigenous group with opportunities to ask questions and provide input regarding the Project and potential effects and to comment on proposed mitigation measures.

Marathon has taken active steps to enhance its understanding of the potential impacts of the Project upon Indigenous land and resource use, interests and concerns. Marathon provided each group with funding to conduct current land use and Traditional Knowledge Studies and incorporated Qalipu’s study into the EIS and taken Miawpukek’s study into account in the development of mitigation measures. Representatives of Miawpukek and Qalipu have participated in Marathon’s Historic Resources Survey, Country Food Survey and Big Game Sampling Program. Virtual meetings with both groups to provide an overview of the EA process as well as targeted meetings with each group to discuss matters of particular interest such as fish and fish habitat, water and water quality, and wildlife were also held in 2021 and 2022.

Marathon has also concluded agreements with each Indigenous group. In May 2021, Marathon entered into a Socio-Economic Agreement (SEA) with Qalipu. The SEA provides a formal process for ongoing engagement and establishes joint collaborative committees respecting environmental stewardship, education and training, and procurement. In addition, provision is made for cultural investment which is currently used to support a scholarship program. In May 2021, Marathon also concluded a Memorandum of Understanding (MOU) with Miawpukek which provided for ongoing engagement, capacity funding relating to the environmental assessment process and the selection of a Community Liaison Coordinator employed by Miawpukek and paid for by Marathon. The MOU also established the framework for SEA negotiations that were substantially completed in 2022.

When signed, the Miawpukek SEA will provide a process for ongoing engagement and implementation, funding for the review of permits and other regulatory authorizations, the establishment of an Environmental Stewardship Sub-Committee, and funding for education and training, among other matters.

Finally, Marathon has engaged with each group respecting avoidance, mitigation, and monitoring measures. Marathon has met with each group to review mitigation and monitoring measures and is committed to the involvement of members of each group in monitoring programs. Since the issuance of

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

the Decision Statement, Marathon has worked with each group to develop and implement a process, including the provision of capacity funding, for consultation with respect to specific follow-up programs and plans. Marathon’s efforts in this regard are discussed below.

5.4.2 CULTURAL AWARENESS TRAINING

Marathon engaged in discussions with both Miawpukek and Qalipu respecting cultural awareness training in September 2022, in accordance with Condition 7.3:

The Proponent shall develop, prior to construction and in consultation with Indigenous groups, cultural awareness training for all employees and contractors associated with the Designated Project. The Proponent shall implement the training prior to the start of construction and during all phases of the Designated Project.

Miawpukek advised that it was in the process of developing training materials and expressed interest in working with Marathon to explore future opportunities pertaining to cultural awareness training. Qalipu had developed cultural awareness training materials which introduced the legal status, history, and linguistic, cultural, spiritual, and socio-economic conditions of the Mi’kmaq peoples. Marathon and Qalipu have worked cooperatively and diligently to implement this training for all existing and future project employees and contractors.

5.4.3 PHYSICAL AND CULTURAL HERITAGE AND STRUCTURE, SITE OR THING OF HISTORICAL, ARCHAEOLOGICAL, PALEONTOLOGICAL OR ARCHITECTURAL SIGNIFICANCE

Marathon is aware that the protection of historic resources is an important issue for Qalipu and Miawpukek.

Condition 8.1:

For any previously unidentified structures, sites, or things of historical, archaeological, paleontological, or architectural significance discovered within the Designated Project area by the Proponent or brought to the attention of the Proponent by an Indigenous group or another party during any phase of the Designated Project.

Condition 8.2:

The Proponent shall require all employees and contractors associated with the Designated Project to undertake, before they conduct any construction activity within the Designated Project area, an awareness training program about the procedures related to the discovery and protection of structures, sites or things of historical, archaeological, paleontological or architectural significance referred to in Condition 8.1. The proponent shall develop the awareness training program in consultation with Indigenous groups.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Representatives of Miawpukek and Qalipu participated in the 2022 Historic Resources survey. The terms of the agreements concluded with each of Qalipu and Miawpukek, vest the respective Environmental Stewardship Committees with authority with respect to applicable protocols relating to accidental discoveries. Marathon has worked with each group and with the Provincial Archaeology Office to develop mutually acceptable process for notification of Provincial Archaeology Office and Indigenous groups in the event of an accidental discovery. The details of the process are referenced in the Marathon Site General Induction training and detailed in the Construction EPP. In addition, employee cultural awareness training materials reference Indigenous historic resources.

Marathon will continue to engage with both Indigenous groups to identify and support opportunities for enhancement of cultural awareness and cultural sensitivity on the part of all employees.

Marathon is committed to the implementation of initiatives that promote reconciliation. In addition to mandatory cultural awareness training, Marathon has commemorated and will continue to observe Indigenous Peoples Day, the National Day for Truth and Reconciliation and any other days of special significance to Indigenous peoples. Marathon has also invested in cultural initiatives including the following:

- Sponsorship of Qalipu Cultural Foundation Gala (June 25, 2022).
- Sponsorship of Day of Discovery (August 23, 2022), a joint initiative of Qalipu and the Department of Fisheries and Oceans, the purpose of which is to offer Indigenous youth cultural learning in the Green Bay – Badger Bay area of the province, highlighting wildlife common to the area and historical seasonal settling areas, and also provides awareness of historic, seasonal travel routes.
- Observation of National Day for Truth and Reconciliation (September 30, 2022) through school visits in collaboration with Qalipu to deliver presentations on Truth and Reconciliation; display of Truth and Reconciliation Flags at the Toronto and Grand Falls-Windsor offices; a presentation by a Mi'kmaq residential school survivor to all Marathon employees.
- Establishment of a Marathon-Qalipu Scholarship Fund.
- Commitment to fund a Miawpukek Scholarship Fund and other forms of cultural investment pursuant to the SEA.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Representatives of Miawpukek and Qalipu participated in the 2022 Historic Resources survey. The terms of the agreements concluded with each of Qalipu and Miawpukek, vest the respective Environmental Stewardship Committees with authority with respect to applicable protocols relating to accidental discoveries. Marathon has worked with each group and with the Provincial Archaeology Office to develop mutually acceptable process for notification of Provincial Archaeology Office and Indigenous groups in the event of an accidental discovery. The details of the process are referenced in the Marathon Site General Induction training and detailed in the Construction EPP. In addition, employee cultural awareness training materials reference Indigenous historic resources.

Marathon will continue to engage with both Indigenous groups to identify and support opportunities for enhancement of cultural awareness and cultural sensitivity on the part of all employees.

Marathon is committed to the implementation of initiatives that promote reconciliation. In addition to mandatory cultural awareness training, Marathon has commemorated and will continue to observe Indigenous Peoples Day, the National Day for Truth and Reconciliation and any other days of special significance to Indigenous peoples. Marathon has also invested in cultural initiatives including the following:

- Sponsorship of Qalipu Cultural Foundation Gala (June 25, 2022);
- Sponsorship of Day of Discovery (August 23, 2022), a joint initiative of Qalipu and the Department of Fisheries and Oceans, the purpose of which is to offer Indigenous youth cultural learning in the Green Bay – Badger Bay area of the province, highlighting wildlife common to the area and historical seasonal settling areas, and also provides awareness of historic, seasonal travel routes;
- Observation of National Day for Truth and Reconciliation (September 30, 2022) through school visits in collaboration with Qalipu to deliver presentations on Truth and Reconciliation; display of Truth and Reconciliation Flags at the Toronto and Grand Falls-Windsor offices; a presentation by a Mi'kmaq residential school survivor to all Marathon employees;
- Establishment of a Marathon-Qalipu Scholarship Fund; and
- Commitment to fund a Miawpukek Scholarship Fund and other forms of cultural investment pursuant to the SEA.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

6.0 FOLLOW-UP PROGRAMS

In general, where a follow-up program has been identified as a requirement of a Condition, a follow-up monitoring program has been developed by subject matter experts in accordance with the requirements of Condition 2.0 and all sub-conditions.

Additionally, follow-up programs were developed in consultation with DFO, ECCC, and other relevant authorities (as required) and through engagement with Miawpukek and Qalipu. Each follow-up program contains the information required under Condition 2.5.

As part of the Indigenous engagement, Marathon worked with each Indigenous group to establish an agreed-upon consultation process (including capacity funding) consistent with the requirements of Condition 2.4. Pursuant to this process, Miawpukek and Qalipu were provided copies of the various follow-up programs for review and comment. Marathon received comments from each group and offered to meet with them to discuss the follow-up programs. Miawpukek and Qalipu were advised as to how their comments were considered, including incorporating results of Indigenous feedback where appropriate (as per Conditions 2.3 and 2.4).

The follow-up programs have been implemented and will be reported on during all Project phases, in accordance with the applicable Decision Statement Conditions from Section 2 (General Conditions) and Marathon will continue to engage with each Indigenous group over the life of the follow-up monitoring program.

The follow-up programs are living documents that, in accordance with the ESMS, will be reviewed at a defined interval, updated, and improved upon based on the monitoring results, policy changes and technology changes as the Project progresses through the various phases.

This section provides a summary of activities undertaken during the reporting period related to the follow-up programs required by Conditions 3.17, 3.18, 4.8, 4.9, and 6.1.

The general requirements of all follow-up programs are described in Condition 2.8:

- *2.8.1 – implement the follow-up program according to the information determined pursuant to Condition 2.5;*
- *2.8.2 – conduct monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular Condition and/or to determine the effectiveness of any mitigation measure;*
- *2.8.3 – determine whether modified or additional mitigation measure(s) are required based on the monitoring and analysis undertaken pursuant to Condition 2.8.2; and*

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

- 2.8.4 – if modified or additional mitigation measure(s) are required pursuant to Condition 2.8.3, develop and implement these mitigation measure(s) in a timely manner and monitor them pursuant to Condition 2.8.2.

6.1 FISH AND FISH HABITAT FOLLOW-UP MONITORING PROGRAM

6.1.1 PROGRAM OVERVIEW

The Fish and Fish Follow-up Monitoring Program (FFHMP) was developed to verify the accuracy of the EA and determine the effectiveness of the mitigation measures as they pertain to adverse environmental effects of the Designated Project on fish and fish habitat, in accordance with Condition 3.17:

The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Fisheries and Oceans Canada, Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as they pertain to adverse environmental effects of the Designated Project on fish and fish habitat.

The FFHMP provides a summary of fish species and fish habitat potentially affected by the Project and describes follow-up and monitoring activities for all phases of the Project, based on regulatory compliance requirements and Project approvals and authorizations.

The FFHMP monitoring activities, include aspects of fish rescue (Fish Rescue Plan), offsetting to counterbalance habitat alteration, deterioration, destruction (Offsetting Plan), and Environmental Effects Monitoring (EEM) studies required for mines regulated under the *Metal and Diamond Mining Effluent Regulations* (MDMER) as part of their authority to deposit effluent. Monitoring requirements for water quality specified in the *Fisheries Act* Authorization or through letter(s) of advice or other approvals issued for the Project are included in the Water Management Plan.

6.1.2 2022 PROGRAM RESULTS

In 2022, there were three field programs completed in support of the FFHMP, the 2022 Spring Littoral Index Netting Program, the 2022 Fish Rescue Program and the 2022 Aquatic Baseline Technical Data Report to Support Environmental Effects Monitoring.

The 2022 Spring Littoral Index Netting Program was a baseline survey was conducted between May 25 and June 1, 2022, within the littoral zone of Victoria Lake Reservoir and Valentine Lake. The purpose of the baseline survey was to assess aquatic diversity and fish populations and to assess baseline metal concentrations in fish tissues, in accordance with the EA Condition of release from the Newfoundland and Labrador Fisheries, Forestry and Agriculture (NLDFFA) – Wildlife Division.

The October 2022 Fish Rescue Program was conducted prior to dewatering areas where construction activities would be conducted, to meet the regulations under Section 35 of the *Fisheries Act*. The main

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

areas of focus for the 2022 fish rescues were areas of direct loss associated with the Leprechaun open pit and process plant complex. Additional fish rescues will be required as the Project construction progresses.

The 2022 Aquatic Baseline Technical Data Report to Support Environmental Effects Monitoring, is a baseline EEM program completed by Marathon but is not a requirement under MDMER. The purpose of the baseline study was to collect baseline biological information on fish populations, metals in fish tissue, Benthic Invertebrate Community (BIC), water quality and sediment quality, according to the standard methods used for biological monitoring studies under MDMER.

Water quality results were within guidelines, except for one site. In one waterbody, identified as Stream 9, the sample contained arsenic concentrations above the Canadian Water Quality Guidelines for the Protection of Aquatic Life (CWQG PAL).

Sediment quality results were above guideline criteria at three sample locations:

- Stream 9: Arsenic was above the Canadian Sediment Quality Guideline (CSQG), the Interim Sediment Quality Guideline (ISQG) and the probable effects limit (PEL)), and cadmium and zinc were above the CSQG ISQG;
- Stream 16: Arsenic was above the CSQG ISQG and PEL; and
- Reference Area: Cadmium, mercury and zinc were above the CSQG ISQG.

6.1.3 ADDITIONAL MITIGATION MEASURES

No additional measures have been or are proposed for implementation at this time.

6.2 ACID ROCK DRAINAGE AND METAL LEACHING MANAGEMENT PLAN

The Acid Rock Drainage and Metal Leaching (ARD/ML) Management Plan (ARD/MLMP) was developed, to verify the accuracy of the EA and determine the effectiveness of the mitigation measures as they pertain to adverse environmental effects, in accordance with Condition 3.18:

The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Fisheries and Oceans Canada, Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and the effectiveness of the mitigation measures as they pertain to acid rock drainage and metal leaching into the receiving environment from the Designated Project area, including from the waste rock storage areas, low-grade ore and ore stockpiles, and the tailings management facility. The Proponent shall implement the follow-up program through all phases of the Designated Project.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

The development of this plan also addresses Condition 3.15:

The Proponent shall develop procedures to identify and manage all mine rock that has the potential for or is already undergoing acid generation or metal leaching during all phases of the Designated Project in consultation with Environment and Climate Change Canada, Natural Resources Canada and any other relevant authorities, taking into account the Mine Environment Neutral Drainage Program’s Prediction Manual for Drainage Chemistry from Sulphidic Geologic Materials, and implement these procedures during all phases of the Designated Project.

6.2.1 PLAN OVERVIEW

The follow-up program for ARD/ML was developed during the EA process based on consultation with DFO, ECCC, NRCan, and other relevant authorities (provincial regulatory departments) and through engagement with Miawpukek and Qalipu First Nations. Miawpukek and Qalipu have been advised as to how their comments have been considered, including incorporating the results of those consultations where appropriate per Conditions 2.3 and 2.4. Marathon will continue to engage with each Indigenous group over the life of the follow-up program.

Further, in the second half of 2022 (post-EA release), Marathon has been engaged with the NL Department of Industry, Energy, and Technology (DIET), Mineral Development Division regarding *Mining Act* submissions and approvals. These submissions included the ARD/ML Management Plan, Phase III ARD/ML Report (described below), and how these plans relate to water management, Project design, and proposed rehabilitation and closure planning. The *Mining Act* submissions are issued to DFO and ECCC for review and comment. Comments received during this review/comment/revision process will be incorporated into the ARD/ML Management Plan, along with the results from ongoing kinetic ARD/ML test work (humidity cells and field bin tests), and an updated version is expected to be prepared in Q1 2023 which will be issued to IAAC per Condition 3.5.

The ARD/ML Management Plan describes follow-up and monitoring activities for the construction, operation, and decommissioning/closure phases of the Project, following the Mine Environment Neutral Drainage Program’s Prediction Manual and related regulatory compliance requirements and Project approvals and authorizations. The follow-up program was implemented with the commencement of the construction phase and will be followed during all Project phases, in accordance with the applicable Federal EA Conditions from Section 2 (General Conditions).

This Plan includes a summary of the characterization of the acid rock drainage and metal leaching (ARD/ML) potential of overburden, mine waste, open pit wall rock, and rock materials to be used in construction. Note that a separate, Phase III ARD/ML Report has also been completed which contains the details on all test work and assessment/modelling completed to date and provide recommendations regarding ongoing and future work. The Mine Environment Neutral Drainage Program has and will continue to be used in the assessment and management of rock and soil materials associated with the development, operation, and closure of the Project.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

The Plan details confirmatory ARD and ML test work to be conducted on waste rock and tailings and construction rock during construction and operations; potentially acid-generating (PAG) rock management requirements, and water quality monitoring. The testing and management procedures outlined in the Plan are intended to ensure that no acid-generating or potentially acid-generating materials will be used as construction materials (rock fill, crushed rock). The material (rock) management aspects of the plan addresses covering of all acid generating, potentially acid-generating, and potentially metal leaching materials, as well as other management procedures to protect the environment. These material management requirements cover all phases of the project and incorporated into the Project's *Mining Act* submissions and approvals as noted above, which specify how all materials (PAG and non-PAG are managed during operations and for rehabilitation and closure such that the ARD/ML risk is managed for post-closure conditions.

6.2.2 2022 PROGRAM RESULTS

Confirmation testing, conducted in accordance with the ARD/ML Management Plan commenced in October with the commencement of site earthworks and excavation of rock from the Leprechaun pit for use as rockfill for site development. Confirmatory testing included ARD and ML testing at external laboratories based on the testing rate (samples per number of tonnes) prescribed within the requirements of the ARD/ML Management Plan.

Testing of rock samples from the Leprechaun Pit construction rock have returned results predominantly well above the minimum criteria (lower limit = net neutralization potential < 2) confirming the excavated rock to be non-PAG or acid-consuming and suitable for use as construction rock. Three samples collected in an area of overburden at the Leprechaun Pit returned results below the minimum criteria (net neutralization potential < 2). This overburden material, totaling approximately 2,675 m³, was segregated and stockpiled in the Leprechaun Waste Rock Stockpile area for future blending and encapsulation within the waste rock stockpile in accordance with the ARD/ML Management Plan and the Early Works Development and Rehabilitation and Closure Plan approved by the NL DIET, Mineral Development Division.

6.2.3 ADDITIONAL MITIGATION MEASURES

No additional measures have been or are proposed for implementation at this time.

6.3 AVIFAUNA FOLLOW-UP MONITORING PROGRAM

The Avifauna Follow-up Monitoring Program (AFMP) was developed to verify the accuracy of the EA as it pertains to use by migratory birds of surface water facilities, and to determine the effectiveness of all mitigation measures to avoid harm to migratory birds and their eggs and nests, in consultation with Indigenous groups and ECCC – Canadian Wildlife Services (CWS), in accordance with Conditions 4.8 and 4.9.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Condition 4.8:

The Proponent shall develop, prior to construction and in consultation with relevant authorities and Indigenous groups, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the use by migratory birds, including migratory birds that are listed species at risk, of surface water facilities.

Condition 4.9:

The Proponent shall develop, prior to construction and in consultation with Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of all mitigation measures to avoid harm to migratory birds, including migratory birds that are listed species at risk, their eggs, and nests.

6.3.1 PROGRAM OVERVIEW

The AFMP, describes follow-up monitoring activities and actions implemented, to reduce potential adverse effects on birds, their eggs, and their habitat(s), during the Project, in accordance with regulatory compliance requirements and Project approvals and authorizations.

The AFMP consists of three components: breeding bird monitoring; surface water monitoring and mortality monitoring. Representative species from each of the five avifauna main groups (i.e., landbirds, waterfowl, raptors, upland gamebirds, and species at risk (SAR)) were selected for the assessment of potential Project-effects on a change in habitat and change in mortality risk basis.

6.3.2 2022 PROGRAM RESULTS

Monitoring was not required in 2022. In accordance with the AFMP, sampling will be completed once per year for three consecutive years starting in 2023.

6.3.3 ADDITIONAL MITIGATION MEASURES

No additional measures have been or are proposed for implementation at this time.

6.4 HEALTH OF INDIGENOUS PEOPLES

Marathon has developed four follow-up programs to verify the accuracy of the EA as it pertains to adverse environmental effects of Project-related changes to the quality of air, water, and country foods on the health of Indigenous Peoples, in accordance with Condition 6.1:

The Proponent shall develop, prior to construction and in consultation with Indigenous groups and Health Canada and any other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of changes to the

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

quality of air, water and country foods on the health of Indigenous Peoples, taking into account available traditional knowledge provided by Indigenous groups related to current use of lands and resources for traditional purposes.

The four follow-up programs are described in the following sub-sections.

6.4.1 AMBIENT AIR QUALITY FOLLOW-UP MONITORING PROGRAM

The Ambient Air Quality Follow-up Monitoring Program (AAQFMP) identifies the sources of air contaminant releases during the Project and describes the mitigation measures for reducing gaseous and fugitive dust emissions associated activities Project activities. The document also outlines the ambient air quality monitoring to be conducted to meet federal and provincial ambient air quality monitoring standards and criteria.

The objectives of the AAQFMP are to:

- Implement the ambient air quality monitoring program to monitor ambient particulate matter (PM) and trace metals concentrations relative to regulatory ambient air quality criteria;
- Implement mitigation measures to reduce emissions from the Project activities to the extent feasible; and
- Use the ambient air quality monitoring results for PM and trace metals to implement adaptive management for fugitive dust emissions, as required.

It is anticipated that this follow-up monitoring program will be updated with further details such as specific equipment and sampling locations prior to the start of the program.

6.4.1.1 2022 PROGRAM RESULTS

In accordance with the AAQFMP, the number and location of monitoring stations and frequency of sampling is being developed through the applicable permitting and in consultation with NLDECC for implementation in 2023.

6.4.1.2 ADDITIONAL MITIGATION MEASURES

No additional measures have been or are proposed for implementation at this time.

6.4.2 SURFACE WATER FOLLOW-UP MONITORING PROGRAM (SWFMP) PROGRAM

The Surface Water Follow-up Monitoring Program (SWFMP) was developed to verify the accuracy of the EA as it pertains to potential adverse environmental effects of Project-related changes to water. The primary purpose of the SWFMP is to identify the existing surface conditions, monitor the surface water and describe the management and mitigation measures that will be used to reduce the potential effects from the Project.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

In addition, the SWFMP will confirm compliance with applicable regulations and approvals (e.g., MDMER under the *Fisheries Act*,) and the site Certificate of Approval issued by NLDECC under the *NL Environmental Protection Act*).

6.4.2.1 2022 PROGRAM RESULTS

In 2022 samples were collected and analyzed in accordance with the NLDECC Certificate of Approval. All test results met regulatory criteria. The MDMER requirements will commence at the start of the Operations Phase.

6.4.2.2 ADDITIONAL MITIGATION MEASURES

No additional measures have been or are proposed for implementation at this time.

6.4.3 GROUNDWATER FOLLOW-UP MONITORING PROGRAM

The Groundwater Follow-up Monitoring Program (GWFMP) was developed to verify the accuracy of the EA as it pertains to adverse environmental effects of Project-related changes to water. The GWFMP defines the monitoring of groundwater levels and groundwater quality at key Project locations. Monitoring data from these locations will be used to validate the predicted effects of the Project on groundwater and to meet regulatory requirements related to specific permits and Conditions of approval.

6.4.3.1 2022 PROGRAM RESULTS

In 2022, samples were collected and analyzed in accordance with the GWFMP. All test results met guideline criteria.


6.4.3.2 ADDITIONAL MITIGATION MEASURES

No additional measures have been or are proposed for implementation at this time.

6.4.4 COUNTRY FOODS FOLLOW-UP MONITORING PROGRAM

The Country Foods Follow-up Monitoring Program (CFFMP) was developed to verify the accuracy of the EA as it pertains to adverse environmental effects of Project-related changes to country foods on the health of Indigenous peoples. Country foods harvested from within the local assessment area have and will be sampled on an on-going basis to monitor the quality of terrestrial (plants, small and large mammals) and aquatic (fish) country foods, and soil samples will be collected to confirm that EA predictions are accurate and to address potential Indigenous or public concerns.

A baseline country foods sampling plan was completed in 2020. The results of the chemical analysis were then used to determine concentrations of metals in the environment to establish a baseline against which the Project and cumulative environmental effects will be assessed. Consultant Human Health and

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Ecological Risk Assessment (HHERA) experience and standard assessment protocols for mining projects, and metals (including mercury), were used to inform the details included in the CFFMP.

6.4.4.1 2022 PROGRAM RESULTS

Sampling was not required in 2022. In accordance with the CFFMP, the onetime sampling required during the Construction Phase will be completed in 2023.

6.4.4.2 ADDITIONAL MITIGATION MEASURES

No additional measures have been or are proposed for implementation at this time.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

7.0 PLANS

In general, where a plan has been identified as a requirement of a Condition, a plan has been developed by subject matter experts in accordance with the requirements of Condition 2.0 and all sub-conditions. Additionally, plans were developed in consultation with DFO, ECCC, and other relevant authorities (as required) and through engagement with Miawpukek and Qalipu. Each plan contains the information required under Condition 2.5.

As part of the Indigenous engagement on these plans, Miawpukek and Qalipu were provided copies of the required plans for review and comment. Marathon received comments from each group and offered to meet with each group to discuss the plans. Miawpukek and Qalipu were advised as to how their comments were considered, including incorporating results of engagement where appropriate (as per Conditions 2.3 and 2.4).

These plans have been implemented and will be reported on during all Project phases, in accordance with the applicable Decision Statement Conditions from Section 2 (General Conditions) and Marathon will continue to engage with each Indigenous group on these plans over the life of the Project.

The plans are living documents that, in accordance with Marathon's ESMS, will be reviewed at a defined interval, updated, and improved upon based on monitoring results, regulatory or policy changes and technology changes as the Project progresses through the LOM phases.

The following sub-sections present an overview of the plans and any updates made during the reporting period.

7.1 OFFSETTING PLAN

Marathon developed the Valentine Gold Project Offsetting Plan, in accordance with Condition 3.1:

The Proponent shall develop, prior to construction and to the satisfaction of Fisheries and Oceans Canada and implement any offsetting plan related to any harmful alteration, disruption or destruction of fish and fish habitat associated with the carrying out of the Designated Project. The Proponent shall submit any offsetting plan approved by Fisheries and Oceans Canada to the Agency before implementing it.

7.1.1 PLAN OVERVIEW

Marathon developed the Offsetting Plan in consultation with DFO to fulfil the requirements of the *Fisheries Act* Authorization to counterbalance the HADD of fish habitat. This plan proposes to offset HADD through the restoration of Victoria River Steady No. 5 via the removal of submerged pulpwood to improve fish habitat for salmonids. The Offsetting Plan was submitted to DFO on May 25, 2022, and approved through issuance of the *Fisheries Act* Authorization on October 18, 2022.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

7.1.2 PLAN UPDATES

There were no updates to the Offsetting Plan during the reporting period. The plan will be maintained and updated as required during all Project phases.

7.2 WATER MANAGEMENT PLAN

The primary mechanism to reduce erosion and sediment during the Project is the water management infrastructure itself. Marathon developed the Water Management Plan (WMP), which summarizes specifications for water management infrastructure, and addresses Conditions 3.7 and 3.9.

Condition 3.7:

The Proponent shall develop prior to construction and implement during all phases of the Designated Project erosion and sediment control measures in a manner consistent with the fish and fish habitat protection provisions and the pollution prevention provisions of the Fisheries Act taking into account Fisheries and Oceans Canada's Measures to Protect Fish and Fish Habitat. The Proponent shall submit the measures to the Agency prior to implementing them. In doing so, the Proponent shall:

- *3.7.1 – develop, in consultation with relevant authorities, and implement measures that take into account future climate change scenarios, including periods of high water and wind, elevated snowpack, heavy rainfall and snowfall.*
- *3.7.2 – maintain and regularly inspect, subject to safety requirements, all erosion and sediment control measures installed within the Designated Project area and document and repair any defective or damaged control measure as soon as technically feasible.*

Condition 3.9:

The Proponent shall manage mine effluent before it is deposited into the receiving environment during all phases of the Designated Project. In doing so, the Proponent shall:

- *3.9.1 – collect effluent, including seepage, from operation through decommissioning, including from the overburden stockpiles, ore stockpiles, waste rock piles, tailings management facility and open pits.*
- *3.9.2 – when collecting effluent pursuant to Condition 3.9.1, construct and maintain contact water collection ditches around overburden stockpiles, ore stockpiles and waste rock piles to collect seepage during all phases of the Designated Project.*
- *3.9.3 – treat effluent collected pursuant to Condition 3.9.1 as required in accordance with the Metal and Diamond Mining Effluent Regulations and the pollution prevention provisions of the Fisheries Act prior to its release into the environment.*

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

7.2.1 PLAN OVERVIEW

The WMP was developed to reduce operational risks and environmental effects of the Project. The plan objectives include:

- Reduce water inventory requiring management through perimeter berms to divert external non-contact runoff.
- Reduce the number of final discharge points through grading of ditches and construction of diversion channels to combine discharge points water management ponds.
- Maintain flow to fish bearing streams and wetlands by maintaining pre-development catchments to the extent feasible.
- Reduce water management costs during operation through grading and gravitational drainage and thereby reduce pumping requirements.

The WMP summarizes the design criteria, information sources, project requirements, design calculations and specifications for water management infrastructure associated with the construction phase and incorporates consideration of future climate change scenarios. In addition, erosion and sediment control measures have been developed to align with the fish and fish habitat provisions and pollution prevention provisions of the *Fisheries Act* and conditions specified in the *Fisheries Act* Authorization.

Erosion and sediment control measures are also described in the Construction EPP, which forms part of the contract documents and work packages, and erosion and sediment control specifications, including objectives, installation and removal procedures and requirements, and inspection and maintenance requirements and checklists. The contractor will update and provide implementation plans for the erosion and sediment control measures prior to the commencement of construction, where applicable.

7.2.2 PLAN UPDATES

There were no updates to the WMP during the reporting period. The plan will be maintained and updated as required during all Project phases.

7.3 FISH RESCUE PLAN

Marathon developed a Fish Rescue Plan (FRP), in accordance with Condition 3.10:

The Proponent shall, salvage and relocate fish in consultation with Fisheries and Oceans Canada prior to conducting any Designated Project activity requiring the removal of fish habitat in a manner that complies with any authorization issued under the Fisheries Act.

7.3.1 PLAN OVERVIEW

The FRP was developed and submitted to DFO for approval as a condition of the *Fisheries Act* Authorization. The *Fisheries Act* Authorization was received in April 2022, and the FRP was finalized in

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

September 2022. The document describes the proposed fish rescue plan which will be conducted prior to dewatering areas of in-water works and following the construction of water management infrastructure, which is predicted to result in the indirect loss of fish habitat and potential fish stranding. The objective of the fish rescue will be to remove as many fish as reasonably practical and transfer them to suitable habitat nearby that will not be affected by the Project. A secondary objective will be to collect biological data from the fish captured (i.e., number, length, weight).

Activities for salvage and relocation of fish will follow the mitigation measures, best management practices, and any approval conditions in the *Fisheries Act* Authorization, as well as any requirements in other applicable permits.

Marathon has and will continue to retain an aquatic biologist will complete the relocation of fish during the fish salvage prior to conducting any work where the removal of fish habitat or dewatering of fish-bearing water is planned to occur, in compliance with the *Fisheries Act* Authorization. These activities will be completed directly prior to installation of Project components such as culverts, realignment activities and instream work, as applicable. An aquatic biologist will obtain and comply with all applicable permits prior to any salvage activities.

7.3.2 PLAN UPDATES

There we no updates to the Fish Rescue Plan during the reporting period. The plan will be maintained and updated as required during all Project phases.

7.4 CURRENT USE OF LANDS AND RESOURCES FOR TRADITIONAL PURPOSES INDIGENOUS COMMUNICATIONS PLAN

Marathon has developed the Current Use of Lands and Resources for Traditional Purposes Indigenous Communications Plan ('the Plan') to meet Conditions 7.1 and 7.2.

Condition 7.1:

The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a communication plan to share information with Indigenous groups on the adverse environmental effects of Designated Project activities as they relate to the current use of lands and resources for traditional purposes. The Proponent shall implement and maintain the communication plan during all phases of the Designated Project.

Condition 7.2:

The Proponent shall develop, as part of the communication plan referred to in Condition 7.1 and in consultation with Indigenous groups, procedures for Indigenous groups to communicate to the Proponent their concerns or views about adverse environmental effects caused by the Designated Project related to the current use of lands and resources for traditional purposes,

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

including issues of access, and procedures for the Proponent to document and respond in a timely manner to the concerns received and demonstrate how issues have been addressed, including through the implementation of additional or modified mitigation measures. The Proponent shall implement these procedures during all phases of the Designated Project.

7.4.1 PLAN OVERVIEW

The plan establishes a communication protocol which will be observed by Marathon in advance of conducting routine Project activities (either on-site or in the surrounding area) that may have adverse effects of the current use of lands and resources for traditional purposes by Miawpukek or Qalipu. The Plan is to be read in conjunction with the Indigenous communications plan contained in Appendix A of the Accidents and Malfunctions Prevention and Response Plan (AMPRP), which addresses communication with Indigenous groups in the case of an unplanned event or accident which results in adverse environmental effects.

Marathon has engaged and will continue to engage with both Miawpukek and Qalipu, respecting the potential adverse effects of the Project upon the current use of lands and resources for traditional purposes.

This plan consists of two principal components:

- A formalized process for quarterly advance notification of planned Project activities, the nature and magnitude of potential environmental effects of those activities and associated mitigation measures; and
- A formalized process for ongoing engagement. Methods of engagement include regular updates on upcoming and ongoing Project activities through e-mail, correspondence, quarterly newsletters, and periodic meetings (either virtual or in-person); transmission of reports including this Annual Report for Federal EA and Marathon’s annual Sustainability Report.

Engagement processes include opportunities for each Indigenous group to identify issues or concerns relating to the potential impact of the Project upon the current use of lands and resources for traditional purposes. These opportunities are provided through periodic meetings, including meetings of joint environmental committees established under a Socio-Economic Agreement or similar agreement to discuss environmental matters. In addition, Marathon will hold an annual meeting with each Indigenous group to discuss the Annual Report for Federal EA, the efficacy of programs referenced in EA Condition 7.1.4, and the need for any additional or modified mitigation measures. Regular engagement processes will also provide opportunities for Indigenous groups to share traditional knowledge and Marathon has committed to involving each group in monitoring programs.

In addition to opportunities for Indigenous input provided through this Plan and through agreements Marathon has concluded with Indigenous groups, Marathon has established an external Stakeholder Grievance Mechanism. Individuals or Indigenous representatives may submit complaints to Marathon through multiple avenues (phone, email, oral notification) and such complaints will be addressed within

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

stipulated timeframes. Grievances shall be tracked and recorded and reported to Marathon’s executive team and stakeholders on a periodic basis and monitored as part of the ESMS. An annual Grievance Report shall be included in Marathon’s annual Sustainability Report which is published on Marathon’s website and distributed to all stakeholders.

Marathon will maintain a tracking document specific to each Indigenous group that will record and document the results of the specific follow-up program, Indigenous issues and concerns, and Marathon’s response to address identified issues, including any modified or additional mitigation measures.

7.4.2 2022 ACTIVITIES

As part of the ongoing engagement with Indigenous groups, advance quarterly notices have been provided regarding upcoming project activities in the upcoming quarter, predicted effects and associated mitigations. During the reporting period, two quarterly notice were issued (Q4 2022 and Q1 2023) and neither Indigenous group expressed any issues or concerns to date.

7.4.3 PLAN UPDATES

There we no updates to the plan during the reporting period. The plan will be maintained and updated as required during all Project phases.

7.5 CARIBOU PROTECTION AND ENVIRONMENTAL EFFECTS MONITORING PROGRAM

Marathon developed a Caribou Protection and Environmental Effects Monitoring Program (CPEEMP) to meet Condition 9.1:

The Proponent shall identify, prior to construction and in consultation with relevant authorities, time periods during which Designated Project activities that may adversely impact woodland caribou (Rangifer tarandus caribou) must be carried out in order to protect the species.

7.5.1 PROGRAM OVERVIEW

The CPEEMP, was developed in consultation with the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA) – Wildlife Division, Indigenous groups, and the NLOA, to identify risks to caribou that migrate through semi-annually or spend time in proximity to the Project and the mitigations and monitoring to be implemented to reduce Project effects on all caribou.

Marathon has been conducting baseline caribou monitoring since 2019, including collar tracking, camera traps, post-calving surveys, and visual observations. This data, along with historical collar and demographic data provided by the NLDDFA – Wildlife Division, has been used to assess caribou activity and behaviour in proximity to the Project. The resulting information has been used to determine how

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Project Activities may adversely impact caribou and the mitigations that will be employed to protect caribou over the life of the Project.

7.5.2 2022 PROGRAM RESULTS

The CPEEMP was implemented when construction commenced in October 2022, and the migration-specific mitigation measures and monitoring activities were implemented for the fall 2022 migration period. As there were generally limited construction activities and limited Project footprint developed at this early stage of the Project, Marathon was easily able to relocate heavy equipment, reduce traffic, and limit activities during the migration period.

Monitoring of caribou using collar tracking software, camera traps, and visual observations via spotting scope and drone commenced in accordance with the CPEEMP, to determine the location of the caribou and monitor their behaviour and movement. Monitoring continued until the last collared caribou was located southeast of the project site.

7.5.3 PLAN UPDATES


Based on consultation with the NLDDFA – Wildlife Division, Marathon developed a Fall 2022 migration-specific protection plan to supplement the CPEEMP. The migration-specific plan focused on mitigations required based on the construction activities being planned by Marathon within the migration period. During the construction phase and early operations phase, as the Project activities and project components will fluctuate in terms of location, intensity and footprint, migration-specific plans will continue to be developed for each migration period.

Marathon is in ongoing consultation with the NLDDFA – Wildlife Division with respect to all commitments respecting caribou and the CPEEMP. Ongoing consultation with respect to the CPEEMP will result in updates to the CPEEMP in 2023, primarily related to long term monitoring strategy and assessment of data. More generally, Marathon will review and update the CPEEMP in collaboration with NLDDFA-Wildlife Division based on the data collected via monitoring during all Project phases.

7.6 ACCIDENTS AND MALFUNCTIONS PREVENTION AND RESPONSE PLAN

Marathon developed an AMPRP to meet Condition 10.3:

The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, an accidents, and malfunctions response plan in relation to the Designated Project.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

7.6.1 PLAN OVERVIEW

The AMPRP was developed to identify potential accidents and malfunctions that may cause adverse environmental effects and outlines mitigation, response measures for each and reporting requirements. The Indigenous Communication Plan (Appendix B) details the procedures that Marathon will employ to notify Miawpukek and Qalipu upon the occurrence of accidents and malfunctions.

7.6.2 PLAN UPDATES

There were no accidents or malfunctions in 2022 that required external communication or reporting. The plan will be maintained and updated as required during all Project phases.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

8.0 ADDITIONAL FOLLOW-UP PROGRAMS AND PLANS

In addition to the various follow-up programs and plans that are a requirement of a Condition set out in the Decision Statement described in Sections 6.0 and 7.0, Marathon has also developed other follow-up monitoring programs and plans. Summaries of these programs and plans are presented in Table 8-1 below.


	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Table 8-1 Summary of Additional Follow-up Monitoring Programs and Plans

Document Title	Document Type	Issue Date	Summary and Purpose of Program/Plan
Greenhouse Gas Emissions Follow-up Monitoring Program	Monitoring Program	2022-09-28	The purpose of the Greenhouse Gas Emissions Follow-up Monitoring Program (GHGEFMP) is to verify predictions and address commitments made in the EIS (Marathon 2020) as well as those developed through Information Requirements (IR) received as part of the regulatory review process. This document describes follow-up and monitoring activities for the construction, operation, and decommissioning/closure phases of the Project, based on regulatory compliance requirements and Project approvals and authorizations. In the context of this program, “monitoring” of greenhouse gas (GHG) emissions refers to the quantification of GHG emissions based on activities and estimates associated with the associated releases to the atmosphere, and not the direct measurement of GHG emissions.
Other Wildlife Follow-up Monitoring Program	Monitoring Program	2022-09-21	The purpose of the Other Wildlife Follow-up Monitoring Program (OWFMP) is to verify predictions and address commitments made in the EIS. The EIS is required as per Section 67(3) (a) of the <i>NL Environmental Protection Act</i> . This document describes follow-up and monitoring activities for the construction, operation, and decommissioning/closure phases of the Project, based on regulatory compliance requirements and Project approvals and authorizations. For this OWFMP, other wildlife, as defined in the EIS, includes large mammals (except caribou), furbearers and small mammals; separate Plans have been developed specific to avifauna and caribou.
Outfitters Environmental Effects Monitoring Plan	Monitoring Plan	2022-06-29	The OEEMP was requested as a Condition of approval for the Project’s EIS. Marathon and the NLOA were required to develop an OEEMP to addresses outfitters effects monitoring for the construction, operation and rehabilitation, closure, and decommissioning phases of the Project. The OEEMP is intended to establish a program to monitor the effectiveness of measures to mitigate potential adverse effects upon outfitters’ land and resource use and associated economic conditions. The OEEMP builds on existing information and commitments made in the EIS as well as information generated through engagement with NLOA and includes: <ul style="list-style-type: none"> • Mitigation objectives. • Mitigation measures. • Monitoring programs and key performance indicators to confirm that mitigation strategies are meeting mitigation objectives. The OEEMP is intended to apply to all outfitters whose operations may potentially be affected by the Project including those outfitters operating in the Regional Assessment Area (RAA) as well as outfitters operating outside the RAA that can establish a direct link between a Project effect and their business.
Construction Environmental Protection Plan	Management Plan	2022-07-05	The purpose of the Construction EPP is to outline protection and response measures associated with potential environmental effects related to Project construction activities. This plan also describes practical procedures required of all personnel (i.e., Marathon employees, contractors, and suppliers) to reduce or eliminate potential adverse environmental effects, as well as instructions for addressing planned and unplanned activities/events associated with Project construction. To avoid and reduce adverse environmental effects, best management practices will be employed throughout all Project activities.



**VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT:
2022 REPORTING PERIOD**

Version: 0.0

Date: March 2023

Document Title	Document Type	Issue Date	Summary and Purpose of Program/Plan
Noise Follow-up Monitoring Program	Monitoring Program	2022-12-06	The Noise Follow-up Monitoring Program (NFMP) provides an overview of the preliminary acoustic assessment (noise monitoring and noise modeling) conducted to support the preparation of the EIS, and its methodology is based on the findings of the preliminary acoustic assessment and recommendations. The monitoring program has been developed to contribute to the mitigation, management, and monitoring of Project-related effects on sound quality. The program is based on regulatory compliance requirements and approvals and authorizations specific to the Project; however, additional mitigation, management, and monitoring details may be determined upon issuance of regulatory permitting and consultation with regulators.
Construction Traffic Management Plan	Management Plan	2022-04-26	The Construction Traffic Management Plan (TMP) is a component of the EPP. The intent of this plan is to reduce impacts on regional traffic during the construction phase of the Project. This document describes the key aspects of traffic management and controls to be implemented by Marathon associated with site access, traffic routing and management with respect to vehicle and employee transportation during the construction phase for the Project. The requirements under this Plan apply to Marathon's staff, contractors, and consultants. This plan focusses on the primary, public road network for the Project, comprising the mine access road and traffic movement through Buchan's Junction and Millertown.
Waste Management Plan	Management Plan	2022-07-25	The purpose of the Waste Management Plan is to ensure that collection, storage, transportation, and disposal of all waste generated by the Project is conducted in a safe, efficient, and environmentally compliant manner. The Waste Management Plan identifies potential waste streams and establishes roles and responsibilities of the various Marathon departments and contractors as well as setting guidelines for storing and processing the waste within the various Waste Management Facilities at the Project site. This Waste Management Plan applies to construction and operations at Valentine Lake Project. All personnel, including site visitors and contractors, are required to follow the requirements outlined in the Waste Management Plan. The plan is reviewed on an annual basis and updated as necessary to accommodate changes in waste streams, or technology.
Emergency Response Plan	Management Plan	2023-01-04	The purpose of the Emergency Response Plan (ERP) is to provide an appropriate and consistent response to any reasonably foreseeable emergency that may occur at the Marathon's Project. The ERP provides the framework in the event of an emergency for the protection of life, environment, property/equipment and to identify predetermined courses of action during emergency situations at the Project. This plan defines the responsibilities of key personnel and outlines the protocols to be followed when responding to emergencies in a way that will avoid or minimize health and safety risks, reduce trauma, safety hazards, environmental damage, and reputation with efforts to return to normal business.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

9.0 REFERENCES

Canadian Environmental Assessment Act, S.C. 2012, c.19, s.52. 2012. Retrieved from <https://laws-lois.justice.gc.ca/eng/acts/c-15.21/FullText.html>

Canadian Council of Ministers of the Environment. 2023. Canadian Environmental Quality Guidelines. Retrieved from <https://ccme.ca/en/resources>

Environmental Protection Act, SNL. 2002. CHAPTER E-14.2. Retrieved from <https://www.assembly.nl.ca/legislation/sr/statutes/e14-2.htm>

Fisheries Act, SNL.1995, CHAPTER F-12.1. Retrieved from <https://www.assembly.nl.ca/legislation/sr/statutes/f12-1.htm>

Impact Assessment Agency of Canada (IAAC). 2022. Decision Statement Issued under Section 54 of the *Canadian Environmental Assessment Act, 2012*, for the Valentine Gold Project. August 23, 2022.

Impact Assessment Agency of Canada (IAAC). 2022. Valentine Gold Project Environmental Assessment Report – Valentine Gold Project. August 23, 2022.

Impact Assessment Agency of Canada (IAAC). 2022. Potential conditions under the *Canadian Environmental Assessment Act, 2012*. May 25, 2022. Accessible at <https://iaac-aeic.gc.ca/050/documents/p80169/143896E.pdf>

International Cyanide Management Code for the Manufacture, Transport, and Use of Cyanide in the Production of Gold, 2002. Retrieved from <https://cyanidecode.org/the-cyanide-code/>

Marathon (Marathon Gold Corporation). 2020. Valentine Gold Project Environmental Impact Statement. September 2020.

Marathon (Marathon Gold Corporation). 2022a. Emergency Response Plan for Valentine Lake (Draft).

Marathon (Marathon Gold Corporation). 2022b. Valentine Gold Project: Acid Rock Drainage Metal Leaching Management Plan. Version 1.0. September 2022.

Marathon (Marathon Gold Corporation). 2022c. Valentine Gold Project: Ambient Air Quality Follow-up Monitoring Program. Version 1.0. November 2022.

Marathon (Marathon Gold Corporation). 2022d. Valentine Gold Project: Avifauna Follow-up Monitoring Program. Version 1.0. October 2022.

Marathon (Marathon Gold Corporation). 2022e. Valentine Gold Project: Caribou Protection and Environmental Effects Monitoring Plan (Preliminary). Version 0.0. January 2022.

Marathon (Marathon Gold Corporation). 2022f. Valentine Gold Project: Construction Environmental Protection Plan, Version 1.0. April 2022.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Marathon (Marathon Gold Corporation). 2022g. Valentine Gold Project: Construction Traffic Management Plan. Version 1.0. April 2022.

Marathon (Marathon Gold Corporation). 2022h. Valentine Gold Project: Country Foods Follow-up Monitoring Program. Version 1.0. September 2022.

Marathon (Marathon Gold Corporation). 2022i. Valentine Gold Project: Fish Rescue Plan. September 2022.

Marathon (Marathon Gold Corporation). 2022j. Valentine Gold Project: Groundwater Follow-up Monitoring Program. Version 1.0. November 2022.

Marathon (Marathon Gold Corporation). 2022k. Valentine Gold Project: Offsetting Plan to Support the Application for a fisheries Act Authorization. April 2022.

Marathon (Marathon Gold Corporation). 2022l. Valentine Gold Project: Outfitters Environmental Effect Monitoring Plan. June 2022.

Marathon (Marathon Gold Corporation). 2022m. Valentine Gold Project: Surface Water Follow-up Monitoring Program. Version 1.0. September 2022.

Marathon (Marathon Gold Corporation). 2022n. Valentine Gold Project: Water Management Plan. Version 0.0. June 2022.

Marathon (Marathon Gold Corporation). 2023a. Valentine Gold Project Fish and Fish Habitat Follow-up Monitoring Plan. Version 1.0. Jan 2023.

Marathon (Marathon Gold Corporation). 2023b. Valentine Gold Project: Greenhouse Gas Follow-up Monitoring Program. Version 0.0. January 2023.

Marathon (Marathon Gold Corporation). 2023c. Valentine Gold Project: Hazardous Waste Storage and Tracking. Revision A. November 2022.

Marathon (Marathon Gold Corporation). 2023d. Valentine Gold Project: Noise Follow-up Monitoring Plan. Version 0.0. January 2023.

Marathon (Marathon Gold Corporation). 2023e. Valentine Gold Project: Other Wildlife Follow-up Monitoring Plan. Version 0.0. January 2023.

Metal and Diamond Mining Effluent Regulations (SOR/2002-222). Retrieved from <https://laws-lois.justice.gc.ca/eng/Regulations/SOR-2002-222/>

Newfoundland and Labrador Department of Environment and Climate Change. 2022. COR/2022/00660. Valentine Gold Project EIS Review. March 17, 2022.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Appendix A CONDITION IMPLEMENTATION ACTIVITIES

Condition Number	Condition	Implementation Activities Undertaken	Schedule
2 General Conditions			
General Conditions (2.1 to 2.2)			
2.1	The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge including community and Indigenous knowledge, available at the time the Proponent takes action, are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies.	Refer to Section 4 of the IAAC Annual Report	Prior to construction and ongoing over the life of the Project
2.2	The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement are taken in a way that is consistent with any applicable recovery strategy and action plans for listed species at risk.	The mitigation measures described in the EIS and in responses to information requests were developed in consideration of applicable recovery strategies and action plans for listed species at risk. These have been incorporated, as applicable, into the Construction Environmental Protection Plan (EPP), which is a document that is embedded in Marathon's contractual management process, communicated through the Request for Proposal process, and incorporated into the contract upon award. Construction contractors and sub-contractors will be required, through their contracts with Marathon, to implement mitigation measures as directed, and the implementation of mitigation measures will be monitored throughout all Project phases.	Prior to construction and ongoing over the life of the Project
Consultation (2.3 to 2.4)			
2.3	The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement:		Initiated June 22 and ongoing as required by the specific condition.
2.3.1	Provide a written notice of the opportunity for the parties being consulted to present their views and information on the subject matter of the consultation.	Consultation with party or parties specific to each condition with a requirement to consult, will be undertaken by the following process. Marathon will issue a written request in the form of e-mail or correspondence to the relevant parties containing a request to the party to provide its views and information on the information which Marathon will provide as part of the consultation request. All requests will be documented and recorded in the Annual Report under condition 2.10. Marathon will continue to provide written notice respecting the opportunity for consultation to the party or parties as required by and in accordance with the timing specified in those conditions (e.g., prior to operation start or project change) identifying the requirement for consultation.	Initiated June 22 and ongoing as required by the specific condition.
2.3.2	Provide all information available and relevant to the scope and the subject matter of the consultation and a period of time agreed upon with the parties being consulted, not to be less than 15 days, to prepare their views and information.	In accordance with condition 2.3.2 and subject to the agreement of the parties, Marathon will provide at least 15 days for parties being consulted to review and provide comments on all available information that is relevant to the scope and subject matter of the consultation. A summary of consultation with the various parties, including the views / information received, Marathon's response documenting how this information was considered, and the rationale for this response, will be tracked and consolidated for inclusion in the annual report under condition 2.10. Refer to Section 2.4 for additional information.	Initiated June 22 and ongoing as required by the specific condition.
2.3.3	Undertake an impartial consideration of all views and information presented by the parties being consulted on the subject matter of the consultation.	In accordance with Condition 2.3.3, where comments on information relevant to the conditions of approval have been received from a party being consulted, Marathon will undertake an impartial review and consideration of this information and, where appropriate, will incorporate the views and information submitted into the final versions of applicable Project processes, plans and programs. Comments provided by parties being consulted and a description of how each comment/view has or has not been incorporated will be recorded and documented in the annual report under condition 2.10. This process will continue on an annual basis, if ongoing consultation is a requirement of a condition set out in the Decision Statement. Refer to Section 2.4 for additional information.	Initiated June 22 and ongoing as required by the specific condition.
2.3.4	Advise in a timely manner the parties being consulted on how the views and information received have, or have not, been integrated into the subject matter of the consultation by the Proponent and provide a justification.	In accordance with condition 2.3.4, where comments expressing views or containing information relevant to the conditions of approval are received from a party being consulted, Marathon will review and consider those views or information for incorporation into the final or updated versions of applicable Project processes, plans, and programs, as appropriate. Marathon will record and document the rationale for why the views or information have, or have not, been integrated and will provide this rationale back to each party who made the comment(s) within a reasonable time. A record of consultation with the various parties, including the views / information received, Marathon's response documenting how the views / information has been considered, and the rationale for Marathon's response, will be tracked and consolidated for inclusion in each annual report under condition 2.10 for the year the comments are received. Refer to Section 2.4 for additional information.	Initiated June 22 and ongoing as required by the specific condition.
2.4	The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this Decision Statement, communicate with each Indigenous group with respect to the manner to satisfy the consultation requirements referred to in condition 2.3, including methods of notification, the type of information and the period of time to be provided when seeking input, the process to be used by the Proponent to undertake impartial consideration of all views and information presented on the subject of the consultation, and the period of time and the means to advise Indigenous groups of how their views and information were considered by the Proponent.	In accordance with condition 2.4, Marathon has engaged with Miawpukek First Nation (Miawpukek) and Qalipu First Nation (Qalipu) to satisfy the consultation requirements referred to in condition 2.3. On June 14, 2022, Marathon wrote to each Indigenous Group proposing an engagement process. Following discussions with both Qalipu and Miawpukek, an agreed-upon engagement process was established, including: <ul style="list-style-type: none"> the methods of notification / communication with each Indigenous group the type of information to be transmitted the period of time to be provided when seeking input from each Indigenous group Information related to follow-up programs was provided to each group as follows: <ul style="list-style-type: none"> Fish and fish habitat: June 30, 2022 Migratory birds: July 7, 2022 Effects of changes to air, water and country foods on the health of Indigenous Peoples: July 8, 2022 Acid rock drainage and metal leaching: July 11, 2022 Additionally, on July 8, 2022, each group was provided with information related to plans for communicating with Indigenous groups regarding potential impacts of Project activities upon the current use of lands and resources for traditional purposes, and accidents and malfunctions response. Comments on the information were submitted to Marathon by Qalipu on July 29, 2022, and by Miawpukek on August 2, 2022. Marathon has reviewed the comments and information provided by each Indigenous group and has offered to meet to discuss the follow-up programs and any matters of concern. Marathon has advised each group how the comments provided have been taken into account, including incorporating the results of those consultations, where appropriate, as per conditions 2.3 and 2.4. A summary has been provided in Appendix B. Marathon will continue in the same manner on an ongoing basis when consultation is a requirement of a condition set out in the Decision Statement.	Initiated June 22 and ongoing as required by the specific condition. Initiated June 22 and ongoing as required by the specific condition.



VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD
APPENDIX A - CONDITION IMPLEMENTATION ACTIVITIES

Version: 0.0

Date: March 2023

Condition Number	Condition	Implementation Activities Undertaken	Schedule
Follow-up programs (2.5 to 2.9)			
2.5 (and all sub-conditions 2.5.1 to 2.5.6)	The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, determine, as part of the development of each follow-up program and in consultation with the parties being consulted during the development, the following information, unless otherwise specified in the condition: <ul style="list-style-type: none"> • 2.5.1 – the methodology, location, frequency, timing and duration of monitoring associated with the follow-up program; • 2.5.2 – the scope, content and frequency of reporting of the results of the follow-up program to the parties consulted for the development of the follow-up program; • 2.5.3 – the minimum frequency at which the follow-up program must be reviewed and, if necessary, updated; • 2.5.4 – the levels of environmental change relative to baseline that would require the Proponent to implement modified or additional mitigation measure(s), including instances where the Proponent may require Designated Project activities to be stopped; • 2.5.5 – the technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change referred to in condition 2.5.4 have been reached or exceeded; and • 2.5.6 – the specific and measurable end points that must be achieved before the follow-up program can end. Those end points should indicate that the accuracy of the environmental assessment has been verified and/or that the mitigation measures are effective. 	Where a follow-up program has been identified as a requirement of a condition, the follow-up program was developed by qualified individuals familiar with the Project, proposed mitigation measures, and predicted effects, and in consultation with the applicable parties (agencies, Indigenous groups). Each follow-up program was developed to include the requirements of this condition and sub-conditions.	Prior to construction and ongoing throughout the duration of the follow-up program until completion of the program.
2.6	The Proponent shall update the information determined for each follow-up program pursuant to condition 2.5 during the implementation of each follow-up program, at the minimum frequency determined pursuant to condition 2.5.3 and in consultation with the parties consulted during the development of each follow-up program.	Marathon will update the follow-up programs consistent with the frequency determined in condition 2.5.3 and in consultation with the parties consulted during the development of each follow-up program.	Ongoing throughout the duration of the follow-up program until completion of the program.
2.7	The Proponent shall provide the details of the follow-up programs referred to in conditions 3.17, 3.18, 4.8, 4.9 and 6.1, including the information determined for each follow-up program pursuant to condition 2.5, to the Agency and to the parties consulted during the development of each follow-up program prior to the implementation of each follow-up program. The Proponent shall also provide any update made pursuant to condition 2.6 to the Agency and to the parties consulted during the development of each follow-up program within 30 days of the follow-up program being updated.	Marathon has and will continue to provide the details of the follow-up programs referred to in conditions 3.17, 3.18, 4.8, 4.9 and 6.1, to the Agency and the parties consulted during the development of each follow-up program prior to its implementation. Marathon will also provide any update to a follow-up program pursuant to condition 2.6 to the Agency and to the parties that were consulted on the development of the plan within 30 days of the update.	Ongoing throughout the duration of the follow-up program until completion of the program.
2.8 (and all sub-conditions 2.8.1 to 2.8.5)	The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement: <ul style="list-style-type: none"> • 2.8.1 – implement the follow-up program according to the information determined pursuant to condition 2.5; • 2.8.2 – conduct monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure; • 2.8.3 – determine whether modified or additional mitigation measure(s) are required based on the monitoring and analysis undertaken pursuant to condition 2.8.2; • 2.8.4 – if modified or additional mitigation measure(s) are required pursuant to condition 2.8.3, develop and implement these mitigation measure(s) in a timely manner and monitor them pursuant to condition 2.8.2. The Proponent shall notify the Agency within 24 hours of any modified or additional mitigation measure being implemented. If the Proponent implements any additional or modified mitigation measure not previously submitted to the Agency pursuant to condition 2.5, the Proponent shall submit a detailed description of the measure(s) to the Agency within 7 days of its implementation; and • 2.8.5 – report all results of the follow-up program to the Agency no later than March 31 following each reporting year during which the follow-up program is implemented and, subject to information determined pursuant to 2.5.2, to the parties consulted during the development of the follow-up program. 	Follow-up programs have been implemented according to the information determined pursuant to condition 2.5. Monitoring and analysis have been and will continue to be conducted to verify the accuracy of the environmental assessment and/or to determine effectiveness of mitigation measures, as outlined in the follow-up programs. The need for modified or additional mitigation measures will be determined based on the results of monitoring pursuant to condition 2.8.2, as outlined in the follow-up programs. If monitoring results demonstrate that mitigation measures are not as effective as planned, modified or additional mitigation measures will be developed and implemented in a timely manner, and monitored pursuant to condition 2.8.2. These modified or additional mitigation measures will be communicated to the Agency within 24 hours of being implemented. If such measures were not contemplated in the various follow-up programs, Marathon will provide a detailed description of the measure(s) to the Agency within 7 days of their implementation. Follow-up programs implemented in the previous calendar year will be reported to the Agency no later than March 31 following each reporting year during which the follow-up program is implemented and, subject to information determined pursuant to condition 2.5.2, submitted to the parties consulted during the development of the follow-up program.	Ongoing throughout the duration of the follow-up program until completion of the program
2.9	Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss the follow-up program with each group and shall determine, in consultation with each group, opportunities for their participation in the implementation of the follow-up program, including the conduct of monitoring, the analysis and reporting of follow-up results and whether modified or additional mitigation measure(s) are required, as set out in condition 2.8.	As noted in the commentary provided for condition 2.4, information on follow-up programs has been provided to Miawpukek and Qalipu as required by the conditions and each group has provided comments to Marathon with respect to the follow-up programs. Marathon has reviewed these comments and has offered to meet with each group to discuss the follow-up programs. Marathon has committed to ongoing engagement with both Qalipu and Miawpukek throughout the life of the Project and this engagement will include any consultation required as a condition of a follow-up program. Marathon's engagement in these cases will include discussion of opportunities for participation in the implementation of specific follow-up programs, including the conduct of monitoring, the analysis and reporting of follow-up results, and the need for modified or additional mitigation measures.	Initiated June 22 and ongoing throughout the duration of the follow-up program until completion of the program
Annual reporting (2.10 to 2.12)			
2.10 (and all sub-conditions 2.10.1 to 2.10.7)	The Proponent shall prepare an annual report that sets out, for each reporting year: <ul style="list-style-type: none"> • 2.10.1 - the activities undertaken by the Proponent to comply with each of the conditions set out in this Decision Statement; • 2.10.2 - how the Proponent complied with condition 2.1; • 2.10.3 - for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation; • 2.10.4 - the information referred to in conditions 2.5 for each follow-up program and any update to that information made pursuant to condition 2.6; • 2.10.5 - the results of the follow-up program requirements identified in conditions 3.17, 3.18, 4.8, 4.9 and 6.1; • 2.10.6 - for any plan that is a requirement of a condition set out in this Decision Statement, any update(s) to the plan that have been made during the reporting year; and • 2.10.7 - any modified or additional mitigation measure implemented or proposed to be implemented by the Proponent, as determined pursuant to condition 2.8. 	An annual report that sets out the activities undertaken to comply with each of the conditions set out in the Decision Statement will be prepared. The annual report will provide information on how each of the conditions were considered in a careful and precautionary manner, and how Marathon's actions in fulfilling these conditions promoted sustainable development and were informed by the best information and knowledge, including community and Indigenous knowledge, available at the time Marathon took action. The report will also provide reference to the methods and models, recognized by standard-setting bodies, that were undertaken by qualified individuals, and with application of the best available economically and technically feasible technologies. The annual report will include a summary table identifying and describing how the Proponent considered any views or information received as a result of consultation with various parties throughout the previous year. The annual report will also include information pertaining to the implementation of the follow-up programs and any updates to those programs stemming from consultation with the various parties, a summary of the results from the follow-up programs that were implemented in the previous year including a summary of the information referred to in condition 2.5 for each follow-up program, and any update to the plans that were made during the reporting year, along with any modified or additional mitigation measure implemented or proposed to be implemented by Marathon.	March 31, 2023 and March 31 each reporting year. Ongoing over the life of the Project.
2.11	The Proponent shall submit to the Agency the annual report referred to in condition 2.10, including a plain language executive summary in both official languages, no later than March 31 following the reporting year to which the annual report applies.	The annual report will include a plain language executive summary in both official languages and will be submitted to the Agency no later than March 31 following the reporting year to which the annual report applies.	March 31, 2023 and March 31 each reporting year. Ongoing over the life of the Project.

Condition Number	Condition	Implementation Activities Undertaken	Schedule
2.12	The first reporting year for which the Proponent shall prepare an annual report pursuant to condition 2.10 shall start on the day the Minister of the Environment issues the Decision Statement pursuant to subsection 54 (1) of the <i>Canadian Environmental Assessment Act, 2012</i> .	Marathon will prepare reports annually starting with the first reporting year, which begins on the day the Minister of the Environment issues the Decision Statement.	Beginning the day the Decision Statement is issued to end of first reporting year.
Information sharing (2.13 to 2.14)			
2.13	The Proponent shall publish on the Internet, or any medium which is publicly available, the annual reports and the executive summaries referred to in condition 2.11 and 2.12, the reports related to accidents and malfunctions referred to in conditions 10.5.4 and 10.5.5, the communication plan for accidents and malfunctions referred to in condition 10.6, the schedules referred to in conditions 11.1 and 11.2, and any update or revision to the above documents, upon submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available for 25 years following the end of operation, or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall notify the Agency and Indigenous groups of the availability of these documents within 48 hours of their publication.	Final versions of the annual reports and executive summaries referred to in conditions 2.11 and 2.12, the reports related to accidents and malfunctions referred to in conditions 10.5.4 and 10.5.5, the communications plan for accidents and malfunctions referred to in condition 9.6, the schedules referred to in conditions 11.1 and 11.2 and any update or revision to any of these documents will be posted publicly to the Project website (https://www.marathon-gold.com). These documents will be maintained on the website and continue to be made publicly available until the earlier of 25 years following the conclusion of operations or the decommissioning of the Project. Marathon will notify the Agency and Miawpukek and Qalipu of the availability of these documents within 48 hours of their publication.	Ongoing over the life of the Project- Estimated 25 years following original posting.
2.14	When the development of any plan is a requirement of a condition set out in this Decision Statement, the Proponent shall submit the final plan to the Agency prior to construction, unless otherwise required through the condition.	All plans required to be developed prior to construction have been submitted to the Agency prior to construction.	Prior to construction, as required by the specific condition .
Change of Proponent (2.15)			
2.15	The Proponent shall notify the Agency and Indigenous groups in writing no later than 30 days after the day on which there is any transfer of ownership, care, control or management of the Designated Project in whole or in part.	Marathon intends to own and operate the Valentine Gold Project in perpetuity; however, should Marathon decide to transfer ownership, care, control or management of the Project (in whole or in part) to another party, Marathon will notify the Agency, Miawpukek First Nation, and Qalipu First Nation in writing no later than 30 days after the day on which that transfer occurs.	Ongoing, no later than 30 days after transfer. As applicable, over the life of the Project.
Change to the Designated Project (2.16 to 2.17)			
2.16 (and all sub-conditions 2.16.1 to 2.16.3)	If the Proponent is proposing to carry out the Designated Project in a manner other than described in condition 1.8, the Proponent shall notify the Agency in writing in advance of carrying out those proposed activities. As part of the notification, the Proponent shall provide: <ul style="list-style-type: none"> • 2.16.1 - a description of the proposed change(s) to the Designated Project and the environmental effects that may result from the change(s); • 2.16.2 - any modified or additional measure to mitigate any environmental effect that may result from the change(s) and any modified or additional follow-up requirement; and • 2.16.3 - an explanation of how, taking into account any modified or additional mitigation measure referred to in condition 2.16.2, the environmental effects that may result from the change(s) may differ from the environmental effects of the Designated Project identified during the environmental assessment. 	In the event that a change to the Designated Project would result in a change to the “Designated Project” description as defined in condition 1.8, Marathon will notify the Agency in writing in advance of carrying out the proposed activities. Notification will include a description of the proposed changes, associated predicted adverse environmental effects, proposed mitigation measures and modified or additional follow-up requirements, as well as an explanation of how the environmental effects may differ from those identified during the EA process.	Ongoing, as applicable over the life of the Project.
2.17	The Proponent shall submit to the Agency any additional information required by the Agency about the proposed change(s) referred to in condition 2.16, which may include the results of consultation with Indigenous groups and relevant authorities on the proposed change(s) and environmental effects referred to in condition 2.16.1 and the modified or additional mitigation measures and follow-up requirements referred to in condition 2.16.2.	Marathon will submit to the Agency any additional information required by the Agency regarding the proposed changes referred to in condition 2.16, including the results of consultation with Indigenous groups and relevant authorities on the proposed changes and environmental effects referred to in condition 2.16.1, as well as the modified or additional mitigation measures and follow-up requirements referred to in condition 2.16.2.	Ongoing, as applicable over the life of the Project.
3 Fish and Fish Habitat			
3.1	The Proponent shall develop, prior to construction and to the satisfaction of Fisheries and Oceans Canada, and implement any offsetting plan related to any harmful alteration, disruption or destruction of fish and fish habitat associated with the carrying out of the Designated Project. The Proponent shall submit any offsetting plan approved by Fisheries and Oceans Canada to the Agency before implementing it.	Marathon developed the Valentine Gold Project Offsetting Plan in consultation with Fisheries and Oceans Canada, and this plan was submitted to Fisheries and Oceans Canada as a component of the application for Fisheries Act Authorization on May 25, 2022. Fisheries and Oceans Canada’s approved the offsetting plan as part of the issuance of the Fisheries Act Authorization on October 18, 2022.	Prior to harmful alteration, disruption or description of fish or fish habitat, in accordance with Fisheries Act Authorization. To be completed prior to implementing the offsetting plan.
3.2	The Proponent shall, for any fish habitat offsetting measure proposed in any offsetting plan referred to in condition 3.1 that may cause adverse environmental effects not considered in the environmental assessment, develop and implement, following consultation with relevant authorities, measures to mitigate those effects. The Proponent shall submit these measures to the Agency before implementing them.	The Valentine Gold Project Offsetting Plan, developed in consultation with Fisheries and Oceans Canada, was submitted to Fisheries and Oceans Canada as a component of the application for Fisheries Act Authorization on May 25, 2022. The offsetting plan includes the identification of potential adverse effects of the proposed offsetting project on fish and fish habitat, and measures and standards to avoid or mitigate these effects. Fisheries and Oceans Canada’s approved the offsetting plan as part of the issuance of the Fisheries Act Authorization on October 18, 2022.	Prior to harmful alteration, disruption or description of fish or fish habitat, in accordance with Fisheries Act Authorization. To be completed prior to implementing the offsetting plan.
3.3	The Proponent shall ensure, during all phases of the Designated Project, that existing fish passage is not removed in watercourses frequented by fish as a result of Designated Project activities, including building and upgrading of stream crossings and those activities that may decrease minimum watercourse flows, with the exception of watercourses that will be removed for the construction of Designated Project components as authorized under the <i>Fisheries Act</i> .	Existing fish passage will not be removed in watercourses frequented by fish, with the exception of watercourses that will be removed for the construction of Designated Project components as specified in the Valentine Gold Project Fisheries Act Authorization application for the mine site. Marathon submitted a Request for Review for the Project roads on December 19, 2021, and Fisheries and Oceans Canada issued a Letter of Advice for the Project roads on March 28, 2022. A subsequent Request for Review for additional work scope was submitted to Fisheries and Oceans Canada on July 25, 2022 and Fisheries and Oceans Canada issued a Revised Letter of Advice for the Project roads on August 25, 2022 submission. The Letter of Advice includes the requirement to maintain fish passage and specifies the parameters needed to maintain appropriate depth and flow, to which Marathon will adhere. The requirements have been incorporated in the Construction EPP, and the Letter of Advice and the Construction EPP form part of the contract documents and work packages. The contractors’ work will be monitored to confirm fish passage is maintained throughout construction and post-construction.	Initiated at the beginning of construction and continue on over the life of the Project.
3.4 (and all sub-conditions 3.4.1 to 3.4.3)	The Proponent shall, during operation, withdraw water from lakes in such a way that water withdrawal does not cause adverse effects to fish and fish habitat, except if such adverse effects are otherwise authorized. In doing so, the Proponent shall: <ul style="list-style-type: none"> • 3.4.1 - establish, prior to construction and in consultation with Fisheries and Oceans Canada, Environment and Climate Change Canada and other relevant authorities, criteria for determining maximum withdrawal rates taking into account natural flow rates and seasonality; • 3.4.2 - calculate maximum withdrawal rates for each month that withdrawal will be necessary and provide them to the Agency; and • 3.4.3 - implement water withdrawal, such that withdrawal rates remain below the maximum rates for each month calculated pursuant to condition 3.4.2. 	Fish and fish habitat will not be adversely affected by water withdrawal from lakes, except as otherwise authorized. Marathon is developing criteria for determining maximum withdrawal rates taking into account natural flow rates and seasonality. Following consultation with Fisheries and Oceans Canada, Environment and Climate Change Canada, and other relevant authorities, the maximum withdrawal rates for each month that withdrawal will be necessary will be calculated and provided to the Agency. During operation, water withdrawal will be monitored via flow meters to assure that the withdrawal rates remain below the maximum calculated rates.	To be implemented prior to water withdrawal from lakes during construction and continue on over the life of the Project.

Condition Number	Condition	Implementation Activities Undertaken	Schedule
3.5	The Proponent shall maintain, during all phases of the Designated Project, a buffer zone of undisturbed vegetation along the edge of any water body and watercourse of sufficient width to protect fish and fish habitat resulting from the construction of Designated Project components, unless such adverse effects are otherwise authorized under the <i>Fisheries Act</i> .	Except where authorized under the Fisheries Act, Marathon will maintain a buffer zone of undisturbed vegetation along the edge of waterbodies and watercourses of sufficient width to protect fish and fish habitat. The Environmental Protection Plan specifies a 50 m vegetated buffer for Victoria River, and a 30 m vegetated buffer for all other waterbodies. These buffer zones are included in the design drawings provided to the contractor, and the Construction EPP forms part of the contract documents and work packages.	Initiated at the beginning of construction and continue on over the life of the Project.
3.6 (and all sub-conditions 3.6.1 to 3.6.2)	The Proponent shall undertake, in consultation with relevant authorities, progressive reclamation of areas disturbed by the Designated Project, including bank and riparian areas. In doing so, the Proponent shall: <ul style="list-style-type: none"> • 3.6.1 – identify plant species native to the regional assessment areas identified in Figure 3 of the environmental assessment report; and • 3.6.2 – use the plant species identified in 3.6.1 for use in establishing self-sustaining communities 	In advance of progressive reclamation, Marathon will identify, in consultation with the applicable authorities, plant species native to the regional assessment areas. Marathon will endeavour to source and use these species in establishing self-sustaining communities throughout progressive reclamation of disturbed areas, including bank and riparian areas. A key objective of the rehabilitation and closure program for the Project is to create the necessary conditions for the re-establishment and long-term propagation of indigenous vegetative species in the areas disturbed by Project related construction activities, and natural revegetation will be encouraged throughout the Project area. Revegetation trials will be considered in the full Rehabilitation and Closure Plan.	To start at the earliest opportunity for progressive reclamation and continue on over the life of the Project.
3.7 (and all sub-conditions 3.7.1 to 3.7.2)	The Proponent shall develop prior to construction and implement during all phases of the Designated Project erosion and sediment control measures in a manner consistent with the fish and fish habitat protection provisions and the pollution prevention provisions of the <i>Fisheries Act</i> taking into account Fisheries and Oceans Canada’s Measures to Protect Fish and Fish Habitat. The Proponent shall submit the measures to the Agency prior to implementing them. In doing so, the Proponent shall: <ul style="list-style-type: none"> • 3.7.1 – develop, in consultation with relevant authorities, and implement measures that take into account future climate change scenarios, including periods of high water and wind, elevated snow pack, heavy rainfall and snowfall; and • 3.7.2 – maintain and regularly inspect, subject to safety requirements, all erosion and sediment control measures installed within the Designated Project area and document and repair any defective or damaged control measure as soon as technically feasible. 	Erosion and sediment control measures have been developed to align with the fish and fish habitat provisions and pollution prevention provisions of the Fisheries Act and taking into account Fisheries and Oceans Canada’s Measures to Protect Fish and Fish Habitat. The application for authorization pursuant to the Fisheries Act included erosion and sediment control measures, and conditions will be specified in the Fisheries Act Authorization. The primary mechanism to reduce erosion and sediment during the Project is the water management infrastructure itself. The Water Management Plan summarizes the design criteria, information sources, project requirements, design calculations and specifications for water management infrastructure associated with the Early Works Construction Phase and incorporates consideration of future climate change scenarios. Erosion and sediment control measures are also described in the Construction EPP, which forms part of the contract documents and work packages, and erosion and sediment control specifications, including objectives, installation and removal procedures and requirements, and inspection and maintenance requirements. Marathon has developed an inspection checklist for use by the site environmental team and the construction coordinators are completing Construction Daily Activity Reports (CDARs) that highlight sediment and erosion control features that are either in place or installed. The contractor will update and provide implementation plans for the erosion and sediment control measures prior to the commencement of construction, where applicable. Marathon will consult with relevant authorities prior to finalizing and implementing the associated measures and will provide the Agency with the measures prior to their implementation. Erosion and sediment control measures will be implemented at the onset of construction, and will be maintained and regularly inspected, with any defective or damaged control measures documented and repaired as soon as technically feasible.	Implemented prior to the start of construction and continue over the life of the Project.
3.8	The Proponent shall remove all vegetation from the tailings management facility containment zone during construction and prior to filling or flooding to reduce the potential generation of methylmercury.	To reduce the potential for generation of methylmercury, all vegetation will be removed from the tailings management facility (TMF) containment zone during construction, prior to filling or flooding the TMF. This mitigation is included in the Construction EPP, which forms part of the contract documents and work packages.	To start and be completed prior to filling or flooding the tailings management facility containment zone.
3.9 (and all sub-conditions 3.9.1 to 3.9.3)	The Proponent shall manage mine effluent before it is deposited into the receiving environment during all phases of the Designated Project. In doing so, the Proponent shall: <ul style="list-style-type: none"> • 3.9.1 - collect effluent, including seepage, from operation through decommissioning, including from the overburden stockpiles, ore stockpiles, waste rock piles, tailings management facility and open pits; • 3.9.2 - when collecting effluent pursuant to condition 3.9.1, construct and maintain contact water collection ditches around overburden stockpiles, ore stockpiles and waste rock piles to collect seepage during all phases of the Designated Project; and • 3.9.3 - treat effluent collected pursuant to condition 3.9.1 as required in accordance with the <i>Metal and Diamond Mining Effluent Regulations</i> and the pollution prevention provisions of the <i>Fisheries Act</i> prior to its release into the environment. 	The Water Management Plan appended to the EIS provided an overview of the water management features and infrastructure designed to reduce operational risks and environmental effects of the Project. Aspects of this plan were updated in response to Information Requests and based on updated modelling and continue to be revised as design progresses. The water management infrastructure for the Project incorporates the design elements described in sub-conditions 3.9.1 to 3.9.3.	Initiated during construction and continue on over the life of the Project.
3.10	The Proponent shall, salvage and relocate fish in consultation with Fisheries and Oceans Canada prior to conducting any Designated Project activity requiring the removal of fish habitat in a manner that complies with any authorization issued under the <i>Fisheries Act</i> .	Marathon developed a fish rescue plan that was submitted to Fisheries and Oceans Canada and approved in April, 2022 as a condition of the Fisheries Act Authorization. Marathon will retain qualified professional services to conduct fish rescues throughout construction prior to any in-water work. An aquatic biologist will complete the relocation of fish during the fish salvage prior to conducting any work where the removal of fish habitat or dewatering of fish-bearing water is planned to occur, in compliance with the Fisheries Act Authorization. These activities will be completed directly prior to installation of Project components such as culverts, realignment activities and instream work, as applicable. An aquatic biologist will obtain and comply with all applicable permits prior to any salvage activities. Activities for salvage and relocation will follow the mitigation measures, best management practices, and any approval conditions in the Fisheries Act Authorization, as well as any requirements in other applicable permits.	Implemented prior to Project activity requiring removal of fish habitat per the fish rescue plan and to be completed as a final Project activity requiring removal of fish habitat.
3.11	The Proponent shall conduct any in-water work activities, outside of restricted activity timing windows for fish species in accordance with Fisheries and Oceans Canada’s <i>Timing Windows to Conduct Projects in or Around Water</i> for Newfoundland and Labrador, unless otherwise permitted by Fisheries and Oceans Canada.	In-water work activities are being scheduled to occur outside of the restricted activity timing windows for fish species located within the watershed, unless otherwise permitted by Fisheries and Oceans Canada.	Ongoing over the life of the Project.
3.12	If the Proponent must conduct any in-water work activities related to construction during the restricted activity timing windows, the Proponent shall develop and implement additional mitigation measures, in consultation with Fisheries and Oceans Canada, to protect fish during sensitive life stages, including migration and spawning. The Proponent shall submit these measures to the Agency prior to implementing them.	Marathon will endeavour to conduct in-water work activities outside of the restricted activity timing windows. In the event that any in-water work is required during the restricted access period, Marathon will consult with Fisheries and Oceans Canada prior to such work occurring. The Agency will be provided with any additional associated mitigation measures prior to their implementation.	Ongoing over the life of the Project.
3.13	The Proponent shall, prior to construction, install screens on the water supply intake structures taking into account Fisheries and Oceans Canada’s <i>Interim Code of Practice for End-of-Pipe Fish Protection Screens for Small Water Intakes in Freshwater</i> and in a manner that is consistent with any authorization issued under the <i>Fisheries Act</i> and its regulations.	The design of the fish screen size for use during pumping or water intakes will be informed by Fisheries and Oceans Canada’s <i>Interim Code of Practice for End-of-Pipe Fish Protection Screens for Small Water Intakes in Freshwater</i> , which provides national guidance on the design and installation of small end-of-pipe water intake fish screens to prevent entrainment and impingement of fish (updated from the 1995 Freshwater Intake End-of-Pipe Fish Screen Guideline). Installation of the pumps will be monitored during construction to confirm appropriate sizing and placement of screens.	To start during construction of water supply intake structures / installation of pumps and be completed prior to operating pumps.

Condition Number	Condition	Implementation Activities Undertaken	Schedule
3.14	The Proponent shall develop, in consultation with Fisheries and Oceans Canada and any other relevant authorities prior to the start of blasting activities in or near water and implement, during blasting activities in or near water, mitigation measures to avoid adverse effects to fish and fish habitat from the use of explosives taking into account Fisheries and Oceans Canada's <i>Guidelines for the use of explosives in or near Canadian fisheries waters</i> and implement the measures in a manner consistent with the <i>Fisheries Act</i> and its regulations. The Proponent shall provide these measures to the Agency before implementing them.	Use of explosives in or near water will be avoided. Should blasting in or near water be required, however, mitigation measures will be developed prior to the start of blasting activities, in consultation with Fisheries and Oceans Canada and any other relevant authorities and in consideration of Fisheries and Oceans Canada's <i>Guidelines for the Use of Explosives in or near Canadian Fisheries Waters</i> . Measures to avoid adverse effects to fish and fish habitat will be implemented in a manner consistent with the <i>Fisheries Act</i> and its regulations, and the Agency will be provided with any such measures prior to their implementation.	To start prior to any blasting activities in or near water and continue over the life of the Project
3.15 (and all sub-conditions 3.15.1 to 3.15.4)	The Proponent shall develop procedures to identify and manage all mine rock that has the potential for or is already undergoing acid generation or metal leaching during all phases of the Designated Project in consultation with Environment and Climate Change Canada, Natural Resources Canada and any other relevant authorities, taking into account the Mine Environment Neutral Drainage Program's Prediction Manual for Drainage Chemistry from Sulphuric Geologic Materials, and implement these procedures during all phases of the Designated Project. In doing so, the Proponent shall: <ul style="list-style-type: none"> • 3.15.1 - characterize, prior to construction, the acid rock drainage and metal leaching potential of the overburden and other mine rock to be used for construction; • 3.15.2 - conduct geochemical testing of waste rock and tailings during operation to verify the magnitude and onset of potential acid rock drainage in waste rock and tailings; • 3.15.3 - taking into account the geochemical testing in condition 3.15.2, develop procedures for segregation of potentially acid generating and metal leaching materials and additional mitigation for storage of waste rock, low-grade ore and other ore; • 3.15.4 - cover all acid generating, potentially acid-generating, and potentially metal leaching materials with an oxygen-limiting barrier prior to the onset of acid rock drainage unless not technically or economically feasible. If not technically or economically feasible, the proponent shall develop additional procedures to prevent the contamination of the receiving environment by acid generating, potentially acid generating, and potentially metal leaching materials, and implement these measures. The proponent shall submit these measures to the Agency prior to implementation; and • 3.15.5 - not use any acid generating and potentially acid generating materials for construction purposes, including earthworks and grading. 	<p>Marathon has completed test work and modelling to update the ARD/ML Management Plan submitted as part of the environmental assessment (EA) process in January 2022. Further, in the second half of 2022 (post-EA release), Marathon has been engaged with the NL Department of Industry, Energy, and Technology (DIET), Mineral Development Division regarding Mining Act submissions and approvals. These submissions included the ARD/ML Management Plan, Phase III ARD/ML Report (described below), and how these plans relate to water management, Project design, and proposed rehabilitation and closure planning. The Mining Act submissions are issued to DFO and ECCC for review and comment. Comments received during this review/comment/revision process will be incorporated into the ARD/ML Management Plan, along with the results from ongoing kinetic ARD/ML test work (humidity cells and field bin tests), and an updated version is expected to be prepared in Q1 2023 which will be issued to IAAC per Condition 3.15.</p> <p>The ARD/ML Management Plan describes follow-up and monitoring activities for the construction, operation, and decommissioning/closure phases of the Project, following the Mine Environment Neutral Drainage Program's Prediction Manual and related regulatory compliance requirements and Project approvals and authorizations. The follow-up program was implemented with the commencement of the construction phase and will be followed during all Project phases, in accordance with the applicable Federal EA Conditions from Section 2 (General Conditions).</p> <p>This Plan includes a summary of the characterization of the ARD/ML potential of overburden, mine waste, open pit wall rock, and rock materials to be used in construction. Note that a separate, Phase III ARD/ML Report has also been completed which contains the details on all test work and assessment/modelling completed to date and provide recommendations regarding ongoing and future work. The Mine Environment Neutral Drainage Program has and will continue to be used in the assessment and management of rock and soil materials associated with the development, operation, and closure of the Project.</p> <p>The Plan details confirmatory ARD and ML test work to be conducted on waste rock and tailings and construction rock during construction and operations; potentially acid-generating (PAG) rock management requirements, and water quality monitoring. The testing and management procedures outlined in the Plan are intended ensure that no acid-generating or potentially acid-generating materials will be used as construction materials (rock fill, crushed rock). The material (rock) management aspects of the plan addresses covering of all acid generating, potentially acid-generating, and potentially metal leaching materials, as well as other management procedures to protect the environment. These material management requirements cover all phases of the project and incorporated into the Project's Mining Act submissions and approvals as noted above, which specify how all materials (PAG and non-PAG are managed during operations and for rehabilitation and closure such that the ARD/ML risk is managed for post-closure conditions.</p>	To start prior to Construction and continue on over the life of the Project
3.16	The Proponent shall store fuel and hazardous materials a minimum of 200 meters from the tributaries of the Victoria River as identified under Fisheries and Oceans Canada's Newfoundland and Labrador Scheduled Salmon Rivers and 100 meters from all other waterbodies.	The requirement to store fuel and hazardous materials a minimum of 200 meters from the tributaries of the Victoria River as identified under Fisheries and Oceans Canada's Newfoundland and Labrador Scheduled Salmon Rivers and 100 meters from all other waterbodies has been incorporated in the Construction EPP, which forms part of the contract documents and work packages. Fuel and hazardous materials storage will be monitored during all Project phases to confirm compliance.	Initiated during construction and continue on over the life of the Project.
3.17 (and all sub-conditions 3.17.1 to 3.17.5)	The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Fisheries and Oceans Canada, Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as they pertain to adverse environmental effects of the Designated Project on fish and fish habitat. The Proponent shall implement the follow-up program during all phases of the Designated Project, taking into account the Monitoring Framework in Section 7.9.1 of the environmental impact statement and including the environmental effects monitoring requirements set out in Schedule 5 of the <i>Metal and Diamond Mining Effluent Regulations</i> . As part of the follow-up program, the Proponent shall: <ul style="list-style-type: none"> • 3.17.1 - monitor open pits for the development of high hydraulic conductivity zones, as well as groundwater levels and groundwater flows associated with pit dewatering and pit filling to verify long-term hydraulic containment within the pits that may enhance groundwater flow; • 3.17.2 - monitor, during all phases of the project, surface water and groundwater flows, levels and quality to verify the assessment predictions identified in Appendices 7A, 7B and 7C of the environmental impact statement; • 3.17.3 - monitor, during all phases of the Designated Project, in consultation with relevant authorities, and taking into account the Canadian Council of Ministers of the Environment's Canadian Water Quality Guidelines for Protection of Aquatic Life, contaminants of concern prescribed by the Metal and Diamond Mining Effluent Regulations as well as mercury, chromium, nitrogen, and phosphorous at locations identified in Section 7.9.1 of the environmental impact statement and at offshore locations on Valentine and Victoria lakes to confirm the zone of influence predicted in the assimilative capacity assessment in appendix 7C of the environmental impact statement; • 3.17.4 - monitor, during decommissioning, and in consultation with Indigenous groups, Environment and Climate Change Canada and other relevant authorities, the water quality of the pit lake during filling to verify that it complies with the pollution prevention provisions of the Fisheries Act prior to connecting it to the receiving environment; and • 3.17.5 - if the results of the monitoring referred to in conditions 3.17.1, 3.17.2, 3.17.3 or 3.17.4 demonstrate that modified or additional mitigation measures are required to protect fish and fish habitat from changes to water quality, develop and implement modified or additional mitigation measures. The Proponent shall submit these measures to the Agency before implementing them. 	<p>The follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as they pertain to adverse environmental effects of the Designated Project on fish and fish habitat is being developed in consultation with Indigenous groups, Fisheries and Oceans Canada, Environment and Climate Change Canada, and other relevant authorities. Information related to the fish and fish habitat follow-up program was provided to Qalipu and MFN on June 30, 2022, and comments have been received from each group. Marathon has reviewed these comments and has offered to meet with each group to discuss the follow-up program. Miawpukek and Qalipu will be advised as to how their comments have been taken into account, including incorporating the results of those consultations where appropriate per conditions 2.3 and 2.4.</p> <p>The follow-up program will be implemented and reported on during all Project phases, in accordance with the applicable EA conditions from Section 2 (General Conditions) and Marathon will continue to engage with each Indigenous group in the implementation of the program.</p> <p>Open pits will be monitored for the development of high hydraulic conductivity zones, as will groundwater levels and groundwater flows associated with pit dewatering and pit filling to verify long-term hydraulic containment within the pits that may enhance groundwater flow. Surface water and groundwater flows, levels and quality will be monitored during all Project phases to verify the EIS assessment predictions. Contaminants of concern prescribed by the <i>Metal and Diamond Mining Effluent Regulations</i>, as well as mercury, chromium, nitrogen, and phosphorous, will be monitored at locations agreed-upon with the applicable regulatory authorities, to confirm the zone of influence predicted in the assimilative capacity assessment in the EIS. Water quality of the pit lake during filling will be monitored, during decommissioning and in consultation with Indigenous groups, Environment and Climate Change Canada, and other relevant authorities, to verify that it complies with the pollution prevention provisions of the Fisheries Act prior to connecting it to the receiving environment.</p> <p>If the results of the monitoring referred to in conditions 3.17.1, 3.17.2, 3.17.3 or 3.17.4 demonstrate that modified or additional mitigation measures are required to protect fish and fish habitat from changes to water quality, these will be developed in consultation with Indigenous groups and the relevant authorities and provided to the Agency prior to their implementation.</p>	<p>Initiated prior to construction and continue on over the life of the Project.</p> <p>Initiated prior to construction and continue on over the life of the Project.</p>

Condition Number	Condition	Implementation Activities Undertaken	Schedule
3.18	The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Fisheries and Oceans Canada, Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and the effectiveness of the mitigation measures as they pertain to acid rock drainage and metal leaching into the receiving environment from the Designated Project area, including from the waste rock storage areas, low-grade ore and ore stockpiles, and the tailings management facility. The Proponent shall implement the follow-up program through all phases of the Designated Project.	The follow-up program for ARD/ML is being developed in consultation with Indigenous Groups, Fisheries and Oceans Canada, Environment and Climate Change Canada, and other relevant authorities, per conditions 2.3 and 2.4. Information related to the ARD/ML follow-up program was provided to Qalipu and Miawpukek for review on July 11, 2022, and comments have been received from each group. Marathon has reviewed these comments and has offered to meet with each group to discuss the follow-up program. Miawpukek and Qalipu will be advised as to how their comments have been taken into account, including incorporating the results of those consultations where appropriate per conditions 2.3 and 2.4. Marathon will continue to engage with each Indigenous group over the life of the follow-up program.	Initiated prior to construction and continue on over the life of the Project.
4 Migratory Birds			
4.1	The Proponent shall carry out the Designated Project, including vegetation clearing and blasting, in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's Guidelines to reduce risk to migratory birds.	Marathon will carry out the Project, including vegetation clearing and blasting, in such a way that it protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. Work will be undertaken in compliance with the Migratory Birds Convention Act, 1994, the Migratory Birds Regulations, and the Species at Risk Act. Environment and Climate Change Canada's Guidelines to reduce risk to migratory birds have been taken into account in developing the mitigation measures, which will be incorporated into the migratory birds follow-up program, and specified in the Construction EPP which forms part of the contract documents and work packages.	Initiated at the beginning of construction and continue on over the life of the Project.
4.2	The Proponent shall conduct vegetation clearing outside of the applicable regional nesting periods for the Designated Project area, unless not technically feasible. If not technically feasible, the Proponent shall develop and implement additional mitigation measures, in consultation with Environment and Climate Change Canada, including the use of non-intrusive monitoring methods and setbacks. The Proponent shall submit these measures to the Agency prior to their implementation.	Marathon will endeavour to conduct vegetation clearing outside of the regional nesting period (April 15 to August 15), where technically feasible. If it is not technically feasible for these activities to avoid this period, Marathon will develop and implement additional mitigation measures in consultation with Environment and Climate Change Canada, including monitoring and setbacks to avoid adverse effects on migratory birds, and their nests and eggs. Any such mitigation measures will be submitted to the Agency prior to their implementation.	Ongoing over the life of the Project.
4.3	The Proponent shall delineate, prior to the start of tree clearing, the areas in the Designated Project area where tree clearing, including along roads, will take place and shall not undertake any tree clearing outside these areas, unless required for health and safety reasons.	Prior to the start of tree clearing in an area (including along roads), the area to be cleared will be delineated, and no tree clearing will be permitted outside of the demarcated area (unless required for health and safety reasons). This measure is included in the Construction EPP, which forms part of the contract documents and work packages.	To start prior to tree clearing and continue until all tree clearing completed.
4.4 (and sub-condition 4.4.1)	The Proponent shall, during construction, operation and decommissioning, use and maintain noise-dampening technologies on all vehicles and heavy equipment used in the Designated Project area. In doing so the Proponent shall: <ul style="list-style-type: none"> • 4.4.1 - keep the technologies in good working order through the implementation of a regular inspection program. 	Noise-dampening technologies will be used and maintained on vehicles and heavy equipment during construction, operation and decommissioning. Equipment will be regularly inspected to ensure proper working order of noise dampening technology, and contractors will be required to report on regular maintenance of equipment, including noise dampening technology, to Marathon as part of regular monthly compliance reporting. These requirements are being incorporated into the contract documents and the Construction EPP, which forms part of the contract documents and work packages.	Initiated at the beginning of construction and continue on over the life of the Project.
4.5	The Proponent shall establish speed limits in accordance with provincial regulations on temporary and permanent roads located within the Designated Project area and require that all persons abide by these speed limits.	Speed limits will be set in accordance with provincial regulations and industry standards (e.g., for haul roads). Additional speed restrictions (determined in consultation with the NL Department of Fisheries, Forestry and Agriculture [NLDFFA] – Wildlife Division) will be posted and communicated during the caribou migration periods. Project vehicles will be required to comply with posted speed limits in all areas, and compliance will be monitored throughout all Project phases.	Initiated at the beginning of construction and continue on over the life of the Project.
4.6	The Proponent shall control lighting required for the construction, operation and decommissioning of the Designated Project, including direction, timing and intensity, to avoid adverse effects on migratory birds including migratory birds that are listed species at risk, while meeting health and safety requirements.	Project lighting will be limited to that which is necessary for safe and efficient activities, with consideration for lighting design guidelines such as the Commission Internationale de L'Éclairage, International Dark Sky Association, and Illuminating Engineering Society. To avoid adverse effects on migratory birds, only the amount of lighting required for safe construction and operation activities will be installed, and exterior lights will be low intensity and shielded from above, providing downward illumination where practicable. Lighting will be designed to avoid excessive use of mobile flood lighting units, and these will be turned off when not required. Full cut-off luminaires will be used wherever practicable to reduce glare, light trespass and sky glow from Project lighting and, to the extent feasible without affecting safe mine operations, exterior lighting will be reduced and/or have limited time of operation during sensitive wildlife periods.	Initiated at the beginning of construction and continue on over the life of the Project.
4.7 (and all sub-conditions 4.7.1 to 4.7.2)	The Proponent shall implement, during all phases of the Designated Project, measures to prevent the killing or harming of migratory birds including migratory birds that are listed species at risk, due to their use of the tailings management facility, including by: <ul style="list-style-type: none"> • 4.7.1 - maintaining embankments of the tailings management facility and the sedimentation ponds free of vegetation during operation; and • 4.7.2 - installing and operating, during operations, a cyanide destruction circuit to minimize cyanide concentrations in mine effluent. 	Marathon will implement measures to prevent the killing or harming of migratory birds due to their use of the tailings management facility. Embankments of the tailings management facility and sedimentation ponds will be maintained free of vegetation during operations to reduce the attractiveness of the facilities to birds, and a cyanide destruction circuit will be installed and operated to minimize cyanide concentrations in mine effluent. Cyanide detoxification within the mill is part of the Project design, which will result in the degradation of cyanide and precipitation of metals prior to discharge to the tailings management facility.	To start after construction of the tailings management facility and continue on over the life of the Project.
4.8 (and all sub-conditions 4.8.1 to 4.8.3)	The Proponent shall develop, prior to construction and in consultation with relevant authorities and Indigenous Groups, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the use by migratory birds, including migratory birds that are listed species at risk, of surface water facilities. As a part of the implementation of the follow-up program, the Proponent shall: <ul style="list-style-type: none"> • 4.8.1 - develop water quality objectives for the protection of migratory birds for surface water facilities in consultation with relevant authorities; • 4.8.2 - monitor the use by migratory birds of open aquatic areas, including the tailings management facility during all phases of the Designated Project until such time that water quality in these structures meet legislative requirements and water quality objectives developed pursuant to condition 4.8.1; and • 4.8.3 - if results of the monitoring pursuant to condition 4.8.2 indicate that migratory birds use these open aquatic areas, develop and implement mitigation measures including but not limited to deterrent measures and/or exclusionary measures. 	The follow-up program to verify the accuracy of the environmental assessment as it pertains to use by migratory birds of surface water facilities was developed in consultation with Indigenous groups and Environment and Climate Change Canada – Canadian Wildlife Services. Information related to the migratory birds follow-up program was provided to Qalipu and Miawpukek for review on July 7, 2022, and comments have been received from each group. Marathon has reviewed these comments and has offered to meet with each group to discuss the follow-up program. Miawpukek and Qalipu will be advised as to how their comments have been taken into account, including incorporating results of consultation where appropriate as per conditions 2.3 and 2.4. Marathon will continue to engage with each Indigenous group over the life of the follow-up program. The follow-up program will be implemented and reported on during all Project phases, in accordance with the applicable EA conditions from Section 2 (General Conditions).	Initiated prior to construction and continue on throughout the duration of the follow-up program until completion of the program.

Condition Number	Condition	Implementation Activities Undertaken	Schedule
4.9 (and all sub-conditions 4.9.1 to 4.9.2)	The Proponent shall develop, prior to construction and in consultation with Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of all mitigation measures to avoid harm to migratory birds, including migratory birds that are listed species at risk, their eggs and nests. The follow-up program shall include the mitigation measures used to comply with conditions 4.1 to 4.6. As part of the development of the follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of mitigation measures. The Proponent shall implement the follow-up program during all phases of the Designated Project. As part of the follow-up program, the Proponent shall: <ul style="list-style-type: none"> • 4.9.1 - have a qualified individual conduct surveys within the Designated Project area, every year for three years, from the beginning of construction, to confirm the presence of migratory birds, including migratory birds that are listed as species at risk; and • 4.9.2 - after three years, determine, in consultation with Environment and Climate Change Canada, the frequency of additional surveys based on the results of the surveys conducted pursuant to 4.9.1. 	The follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of all mitigation measures to avoid harm to migratory birds and their eggs and nests was developed in consultation with Indigenous groups and Environment and Climate Change Canada – Canadian Wildlife Services. As noted in the commentary on condition 4.8, information related to the migratory birds follow-up program was provided to Miawpukek and Qalipu on July 7, 2022, and comments have been received from each group. Marathon has reviewed these comments and has offered to meet with each group to discuss the follow-up program. Miawpukek and Qalipu will be advised as to how their comments have been taken into account, including incorporating results of consultation where appropriate as per conditions 2.3 and 2.4. Marathon will continue to engage with each Indigenous group over the life of the follow-up program. Marathon is developing performance indicators that will be used to evaluate the effectiveness of mitigation measures. The follow-up program will be implemented and reported on during all Project phases, in accordance with the applicable EA conditions from Section 2 (General Conditions). A qualified individual will conduct surveys within the Designated Project area every year for three years, from the beginning of construction, to confirm the presence of migratory birds and, after three years, at a frequency to be determined in consultation with Environment and Climate Change Canada based on the results of the surveys conducted pursuant to 4.9.1.	Initiated prior to construction and continue on throughout the duration of the follow-up program until completion of the program.
5 Greenhouse Gas Emissions			
5.1	The Proponent shall develop the Designated Project area and optimize activities associated with the operation of the Designated Project so as to minimize transportation and distances required to travel within the Designated Project area.	The Project design has been and will continue to be developed and subsequently constructed and operated to optimize transportation and distances required to travel, especially as it pertains to the movement of mine haulage trucks. Logistics and transportation planning and management for construction and operations will utilize busing for personnel and efficient load planning and management for materials transport to and from the site along the site access road. Transportation of materials to and from the site will employ a laydown and marshalling yard in Millertown and warehousing/laydown on site to maximize load efficiency in both directions.	Initiated September 2020 and continue over the life of the Project.
5.2	The Proponent shall ensure all equipment and vehicles associated with the Designated Project, including those equipment and vehicles operated by third-party contractors, are serviced and maintained in accordance with the manufacturer’s maintenance guidelines.	Equipment and vehicles, including those operated by contractors and sub-contractors, will be regularly serviced and maintained in accordance with the manufacturer’s maintenance guidelines. Contractors will be required to report on regular maintenance of equipment to Marathon as part of regular monthly compliance reporting. These requirements are being incorporated into the contract documents and the Construction EPP, which forms part of the contract documents and work packages.	Initiated at the start of construction. Ongoing over the life of the Project.
5.3 (and all sub-conditions 5.3.1 to 5.3.2)	The Proponent shall develop, prior to construction and in consultation with relevant authorities, measures to reduce the fuel consumption of equipment and vehicles associated with the Designated Project, including those operated by the Proponent and other third-party contractors. The Proponent shall apply the measures during all phases of the Designated Project. The measures shall include: <ul style="list-style-type: none"> • 5.3.1 – the development of no-idling and cold start policies for equipment and vehicles operating in the Designated Project area; and • 5.3.2 – procedures to ensure that any person complies with the policies developed pursuant to condition 5.3.1, unless there are technical constraints related to the operation of the equipment and vehicles or constraints related to health or safety. 	No-idling and cold start policies were developed in consultation with relevant authorities and will be implemented for mobile equipment and vehicles operating in the Project area. Monitoring will be conducted throughout all Project phases to verify conformance with these policies, including by contractors, subject to technical constraints related to the operation of the equipment and vehicles, or constraints related to health or safety.	Initiated prior to construction and continue on over the life of the Project.
6 Health and Socio-Economic Conditions of Indigenous Peoples			
6.1 (and all sub-conditions 6.1.1 to 6.1.4)	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and Health Canada and any other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of changes to the quality of air, water and country foods on the health of Indigenous Peoples, taking into account available traditional knowledge provided by Indigenous groups related to current use of lands and resources for traditional purposes. The Proponent shall implement the follow-up program during all phases of the Designated Project. As part of the implementation of the follow-up program, the Proponent shall: <ul style="list-style-type: none"> • 6.1.1 – identify the fish species used by Indigenous groups for fish tissue sampling and the surface waters locations used by Indigenous groups where water quality testing and fish tissue sampling will occur; • 6.1.2 – monitor methylmercury, chromium and arsenic in surface water and fish tissue of species identified in 6.1.1 in locations determined pursuant to condition 6.1.1; • 6.1.3 – monitor ambient air concentrations of contaminants of concern, as described in section 5.9 of the EIS, taking into account the standards and criteria set out in the Canadian Council of Ministers of the Environment’s Canadian Ambient Air Quality Standards and Newfoundland and Labrador’s Air Pollution Control Regulations; and • 6.1.4 – identify additional country foods beyond fish that are being harvested within areas where Designated Project-related contamination of these country foods may occur, as indicated by available traditional knowledge and monitor for contaminants of concern in these country foods at locations identified in consultation with Indigenous groups. 	Follow-up programs to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of Project-related changes to the quality of air, water and country foods on the health of Indigenous Peoples were developed in consultation with Indigenous groups, Department of Fisheries and Oceans Canada, Environment and Climate Change Canada, and other relevant authorities. Information related to the proposed follow-up program was provided to Miawpukek and Qalipu (see commentary on condition 2.4) and Marathon has received comments from each group. Marathon has reviewed these comments and has offered to meet with each group to discuss the follow-up program. Miawpukek and Qalipu will be advised as to how their comments have been taken into account, including incorporating results of consultation where appropriate as per conditions 2.3 and 2.4. The follow-up program will be implemented and reported on during all Project phases, in accordance with the applicable EA conditions from Section 2 (General Conditions) and Marathon will continue to engage with each Indigenous group over the life of the follow-up program.	Initiated prior to construction and continue throughout the duration of the follow-up program until completion of the program.

Condition Number	Condition	Implementation Activities Undertaken	Schedule
7 Current Use of Lands and Resources for Traditional Purposes			
7.1 (and all sub-conditions 7.1.1 to 7.1.4)	<p>The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a communication plan to share information with Indigenous groups on the adverse environmental effects of Designated Project activities as they relate to the current use of lands and resources for traditional purposes. The Proponent shall implement and maintain the communication plan during all phases of the Designated Project. The communication plan shall include:</p> <ul style="list-style-type: none"> • 7.1.1 – identification of Designated Project activities that may affect the quality of experience of Indigenous uses of lands and resources for traditional purposes, including hunting, trapping, fishing and/or gathering; • 7.1.2 – procedures, including timing and methods, for sharing information on the following: • 7.1.3 – the location and timing of Designated Project activities identified pursuant to condition 7.1.1; and • 7.1.4 – the results of the follow-up programs referred to in conditions 3.17, 3.18, 4.8, 4.9 and 6.1, and the modified or additional mitigation measures developed and implemented by the Proponent pursuant to condition 2.6 for each follow-up program. 	<p>Marathon has engaged and will continue to engage with both Miawpukek and Qalipu respecting the potential adverse effects of the Project upon the current use of lands and resources for traditional purposes, including the funding of traditional knowledge/traditional land use studies by each Indigenous group. Marathon’s proposed plan for communicating with Indigenous groups regarding adverse effects related to the current use of lands and resources for traditional purposes was shared with Miawpukek and Qalipu on July 8, 2022, and comments have been received from each group. Marathon has reviewed these comments and has offered to meet with each group to discuss the information and any issues of concern. Miawpukek and Qalipu will be advised as to how their comments have been taken into account, including incorporating results of consultation where appropriate as per conditions 2.3 and 2.4.</p> <p>The communication plan, which is being developed in consultation with each Indigenous group, is intended to formalize a process to inform Indigenous groups about Project-related activities that may affect opportunities for, or the quality of experience related to, the harvesting of plants, fish and game, including access, and will implement this plan during all Project phases. The plan builds upon existing Indigenous engagement strategies and includes the following:</p> <ul style="list-style-type: none"> • Purpose and scope of communication plan; • Roles and responsibilities of each party to the communication plan; • Procedures for information-sharing in relation to the matters identified in conditions 7.1.1., 7.1.3 and 7.1.4, including the method, timing and frequency of communications; • Identification of recipients of shared information and contact information; • Procedures to enable Indigenous persons to express concerns and identify issues relating to the current use of land and resources for traditional purposes, including the form, method and timelines for the transmission of such information by Indigenous groups to Marathon; • Procedures to prescribe the communication of Marathon’s response to Indigenous concerns, including through the implementation of additional or modified mitigation measures and the form, method and timelines for the transmission of such information by Marathon to the Indigenous groups; • Use of the Project website, social media and print media; • Documentation and maintenance of records; • Periodic consolidation and reporting of communications to Indigenous groups, including through annual community meetings to provide Project; update and report on compliance with conditions; and • Procedures for updating the Indigenous communication plan as required. 	Start June 2022 and continue until rehabilitation and closure.
7.2	<p>The Proponent shall develop, as part of the communication plan referred to in condition 7.1 and in consultation with Indigenous groups, procedures for Indigenous groups to communicate to the Proponent their concerns or views about adverse environmental effects caused by the Designated Project related to the current use of lands and resources for traditional purposes, including issues of access, and procedures for the Proponent to document and respond in a timely manner to the concerns received and demonstrate how issues have been addressed, including through the implementation of additional or modified mitigation measures. The Proponent shall implement these procedures during all phases of the Designated Project.</p>	<p>As noted in the commentary to condition 7.1, the communication plan was developed in consultation with Indigenous groups pursuant to condition 7.1 and describes the methods by which Indigenous groups can provide feedback to Marathon respecting the effects of the Project upon the current use of land and resources for traditional purposes as well as the process by which Marathon will share information and respond to this feedback. All feedback received from Indigenous groups and Marathon’s response to feedback was documented and recorded and this record has been shared with Indigenous groups in accordance with the terms of the communication plan. All feedback received during the reporting year and how Marathon has addressed feedback will be provided to Agency as part of the annual report referred to in condition 2.10, including information relating to any additional or modified mitigation measures that Marathon has implemented or plans to implement, or a rationale as to why no additional or modified mitigation measure is required to address the feedback.</p>	Start June 2022 and continue until rehabilitation and closure.
7.3	<p>The Proponent shall develop, prior to construction and in consultation with Indigenous groups, cultural awareness training for all employees and contractors associated with the Designated Project. The Proponent shall implement the training prior to the start of construction and during all phases of the Designated Project.</p>	<p>In addition to Condition 7.3, Marathon has committed to providing mandatory cultural awareness and cultural sensitivity to all employees and contractors as part of the Benefits Agreement concluded with the Province of Newfoundland and Labrador. Pursuant to this commitment, Marathon has engaged in discussions with both Qalipu and Miawpukek respecting cultural awareness resources and has included a commitment to work with each group to develop and deliver appropriate training programs for employees and contractors as part of the Socio-Economic Agreement (SEA) concluded with Qalipu in 2021 and during ongoing SEA negotiations with Miawpukek.</p> <p>Miawpukek advised that it was in the process of developing training materials and expressed interest in working with Marathon to explore future opportunities pertaining to cultural awareness training., Qalipu had developed cultural awareness training materials which introduced the legal status, history, and linguistic, cultural, spiritual, and socio-economic conditions of the Mi’kmaq peoples. Marathon and Qalipu have worked cooperatively and diligently to implement this training for all existing and future project employees and contractors.</p>	All project employees and contractors over the life of the Project
8 Physical and Cultural Heritage and Structures, Sites or Things of Historical, Archaeological, Paleontological or Architectural Significance			
8.1 (and all sub-conditions 8.1.1 to 8.1.5)	<p>For any previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance discovered within the Designated Project area by the Proponent or brought to the attention of the Proponent by an Indigenous group or another party during any phase of the Designated Project, the Proponent shall:</p> <ul style="list-style-type: none"> • 8.1.1 - immediately halt work at the location of the discovery, except for actions required to be undertaken to protect the integrity of the discovery; • 8.1.2 - delineate an area of at least 30 meters around the discovery as a no-work zone; • 8.1.3 - inform the Agency and Indigenous groups within 24 hours of the discovery, and allow Indigenous groups to monitor archaeological works; • 8.1.4 - have a qualified individual, whose expertise pertains to the requirements of Newfoundland and Labrador’s <i>Historic Resources Act</i>, conduct an assessment of the discovery at the location of the discovery; and • 8.1.5 - consult with Indigenous groups and relevant authorities on the manner by which to comply with all applicable legislative or legal requirements and protocols respecting the discovery, recording, transferring and safekeeping of previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance. 	<p>Should any previously unidentified structure, site or thing of historical, archaeological, paleontological or architectural significance be discovered within the Project area by Marathon or be brought to Marathon’s attention by an Indigenous group or another party during any Project phase, Marathon will immediately halt work at the location of the discovery and will follow the steps as specified in sub-conditions 8.1.1 to 8.1.5.</p>	Initiated at the start of construction and continuing on over the life of the Project.

Condition Number	Condition	Implementation Activities Undertaken	Schedule
8.2	The Proponent shall require all employees and contractors associated with the Designated Project to undertake, before they conduct any construction activity within the Designated Project area, an awareness training program about the procedures related to the discovery and protection of structures, sites or things of historical, archaeological, paleontological or architectural significance referred to in condition 8.1. The proponent shall develop the awareness training program in consultation with Indigenous groups.	All employees and contractors are required to undertake an environmental orientation prior to conducting any work at site. The orientation includes awareness training about the procedures related to the discovery and protection of structures, sites or things of historical, archaeological, paleontological or architectural significance. As a result of its continuing engagement with Qalipu and Miawpukek (including during ongoing SEA negotiations with Miawpukek), Marathon is aware of the importance of protecting structures, sites and things of historical, archaeological, paleontological and architectural significance, and will work with each group in the development of the awareness training program.	Initiated at the start of construction and continuing on over the life of the Project.
9 Species at Risk			
9.1	The Proponent shall identify, prior to construction and in consultation with relevant authorities, time periods during which Designated Project activities that may adversely impact woodland caribou (<i>Rangifer tarandus</i> caribou) must be carried out in order to protect the species.	Marathon has been conducting baseline caribou monitoring since 2019, including collaring and tracking, camera traps, and post-calving surveys, and visual observations. This data, along with historical data provided by the NLDFFA – Wildlife Division, has been used to assess caribou activity in proximity to the site and the resulting information respecting caribou activity has been used to determine time periods during which Project Activities may adversely impact caribou and the mitigations that will be employed to protect caribou during these periods. Where possible, Project activities that may adversely impact caribou will be completed outside these time periods, however, where specific activities must be carried out during these time periods, mitigations will be implemented to reduce potential effects including the reduction of certain Project activities during these time periods as described in the Caribou Protection and Environmental Effects Monitoring Plan (CPEEMP). The CPEEMP was developed in consultation with the NLDFFA – Wildlife Division, Indigenous groups and the NL Outfitters Association.	Initiated prior to construction.
9.2	The proponent shall conduct the activities that may adversely impact woodland caribou (<i>Rangifer tarandus</i> caribou) during the time periods identified pursuant to condition 9.1, unless not technically feasible.	Marathon shall conduct activities during the time periods identified in condition 9.1, unless not technically feasible. As the time periods during which Project activities that may adversely impact caribou vary seasonally and annually, Marathon will consult with relevant authorities where activities that must be carried out during the time periods identified in condition 9.1 may require modification.	Initiated prior to construction and continuing on over the life of the Project.
9.3	The Proponent shall, during all phases of the Designated Project in consultation with Environment and Climate Change Canada and other relevant authorities, mitigate adverse environmental effects on woodland caribou (<i>Rangifer tarandus</i> caribou) and its habitat, including by carrying out Designated project activities during time periods referred to in condition 9.2 for woodland caribou (<i>Rangifer tarandus</i> caribou). In doing so, the Proponent shall give preference to avoiding the destruction or alteration of habitat over minimizing the destruction or alteration of habitat, to minimizing the destruction or alteration of habitat over restoring altered or destroyed habitat on-site, and to restoring altered or destroyed habitat on-site over offsetting.	The mitigations developed during the EA process and CPEEMP, and which will be employed during all phases of the Project to reduce adverse effects on caribou, are based on the mitigation hierarchy of 1) avoid; 2) minimize; 3) restore; and 4) offset. The same mitigation hierarchy will also be employed where/if adaptive management measures are required based on follow-up monitoring results, in consultation with Environment and Climate Change Canada, the NLDFFA – Wildlife Division, and other relevant authorities.	Initiated prior to construction and continuing on over the life of the Project.
9.4	The Proponent shall, during all phases of the Designated Project in consultation with Environment and Climate Change Canada and other relevant authorities, mitigate adverse environmental effects on American marten (<i>Martes americana</i>) and its habitat. In doing so, the Proponent shall give preference to avoiding the destruction or alteration of habitat over minimizing the destruction or alteration of habitat, to minimizing the destruction or alteration of habitat over restoring altered or destroyed habitat on-site, and to restoring altered or destroyed habitat on-site over offsetting.	The mitigations developed during the EA process, and which will be employed during all phases of the Project to reduce adverse effects on American marten, are based on the mitigation hierarchy of 1) avoid; 2) minimize; 3) restore; and 4) offset. The same mitigation hierarchy will also be employed where/if adaptive management measures are required based on follow-up monitoring results, in consultation with Environment and Climate Change Canada, the NLDFFA – Wildlife Division, and other relevant authorities.	Initiated prior to construction and continuing on over the life of the Project.
10 Accidents and Malfunctions			
10.1 (and sub-condition 10.1.1)	The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects and mitigate any adverse environmental effects from accidents and malfunctions that occur. In doing so the Proponent shall: • 10.1.1 - design, construct and operate the tailings management facility dams taking into account the Canadian Dam Association’s <i>Dam Safety Guidelines</i> and the Mining Association of Canada’s <i>Guide to the Management of Tailings Facilities</i> .	Proper design, construction and operation of Project components are the key factors in preventing accidents and malfunctions. The planning and design for the tailings management facility has been completed by an expert 3rd party and independently peer-reviewed, and an Independent Tailings Review Board was established in 2021. Marathon is committed to following the Canadian Dam Association’s Dam Safety Guidelines and the Mining Association of Canada’s Guide to the Management of Tailings Facilities over the life of the Project, including closure and post-closure phases.	Start of construction and continuing on over the life of the Project.
10.2	The Proponent shall consult with Indigenous groups and relevant authorities, prior to construction, on the measures to be implemented to prevent accidents and malfunctions referred to in condition 10.1 and provide these measures to the Agency prior to implementing them.	The measures to be implemented to prevent accidents and malfunctions referred to in condition 10.1 were incorporated into the accidents and malfunctions prevention and response plan (see condition 10.3 below). Marathon has consulted Indigenous groups and relevant authorities on the measures to prevent accidents and malfunctions, and Marathon will provide these measures to the Agency prior to implementing them.	Initiated prior to construction.
10.3 (and all sub-conditions 10.3.1 to 10.3.2)	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, an accidents and malfunctions response plan in relation to the Designated Project. The accidents and malfunctions plan shall include: • 10.3.1 - a description of the types of accidents and malfunctions that may cause adverse environmental effects during any phase of the Designated Project, including spills, fires, explosions and accidental releases from the tailings management facility; and • 10.3.2 - the measures to be implemented in response to each type of accident and malfunction referred to in condition 10.3.1 to mitigate any adverse environmental effect caused by the accident or malfunction, including: • 10.3.2.1 - measures to conduct water and fish tissue monitoring following an accidental release from the tailings management facility into water; and • 10.3.2.2 - measures to advise the public if results of the monitoring referred to in 10.3.2.1 demonstrate that fish and/or water is not suitable for human consumption.	Marathon has developed an Accidents and Malfunctions Prevention and Response Plan, that was finalized prior to construction and in consultation with Indigenous groups and relevant authorities, which address all pertinent information per conditions 10.1, 10.3, 10.5 and 10.6. Information regarding planning for prevention of and response to accidents and malfunctions was provided to Miawpukek and Qalipu for review on July 8, 2022, and comments have been received from each group. Marathon has reviewed these comments and has offered to meet with each group to discuss the information and any issues of concern. Miawpukek and Qalipu will be advised as to how their comments have been taken into account, including incorporating results of consultation where appropriate as per conditions 2.3 and 2.4.	Initiated prior to construction.
10.4	The Proponent shall maintain up-to-date the accidents and malfunctions response plan referred to in condition 10.3 during all phases of the Designated Project. The Proponent shall submit any updated accidents and malfunctions response plan to the Agency, Indigenous groups and relevant authorities involved in its implementation within 30 days of the plan being updated.	The Accidents and Malfunctions Prevention and Response Plan will be maintained and updated as required during all Project phases. The plan will be updated if procedures are identified that require amendments or changes based on regulatory changes, procedural changes, or personnel changes that necessitate updates. Marathon will submit any updated accidents and malfunctions plan to the Agency, Indigenous groups and relevant authorities involved in its implementation within 30 days of the plan being updated.	Initiated at the beginning of construction as applicable and continuing on over the life of the Project as applicable.

Condition Number	Condition	Implementation Activities Undertaken	Schedule
10.5 (and all sub-conditions 10.5.1 to 10.5.5)	<p>In the event of an accident or malfunction with the potential to cause adverse environmental effects, including an accident or a malfunction referred to in condition 10.3.1, the Proponent shall immediately implement the measures appropriate to the accident or malfunction, including any measure referred to in condition 10.3.2, and shall:</p> <ul style="list-style-type: none"> • 10.5.1 - implement the communication plan referred to in condition 10.6; • 10.5.2 - notify relevant authorities with responsibilities related to emergency response (including environmental emergencies) in accordance with applicable legislative and regulatory requirements; • 10.5.3 - notify, as soon as possible and pursuant to the communication plan referred to in condition 10.6, Indigenous groups of the accident or malfunction, and notify the Agency in writing no later than 24 hours following the accident or malfunction. When notifying Indigenous groups and the Agency, the Proponent shall specify: <ul style="list-style-type: none"> • 10.5.3.1 - the date and time when and location where the accident or malfunction occurred within the Designated Project area; • 10.5.3.2 - a summary description of the accident or malfunction; • 10.5.3.3 - a list of any substance potentially released into the environment as a result of the accident or malfunction; • 10.5.4 - submit a written report to the Agency no later than 30 days after the day on which the accident or malfunction occurred. The written report shall include: <ul style="list-style-type: none"> • 10.5.4.1 - a detailed description of the accident or malfunction and of its adverse environmental effects; • 10.5.4.2 - a description of the measures that were taken by the Proponent to mitigate the adverse environmental effects caused by the accident or malfunction; • 10.5.4.3 - any view from Indigenous groups and advice from relevant authorities received with respect to the accident or malfunction, its adverse environmental effects and the measures taken by the Proponent to mitigate these adverse environmental effects; • 10.5.4.4 - a description of any residual adverse environmental effect and any modified or additional measure required by the Proponent to mitigate residual adverse environmental effects; and • 10.5.4.5 - details concerning the implementation of the accident or malfunction response plan referred to in condition 10.3. • 10.5.5 - submit a written report to the Agency no later than 90 days after the day on which the accident or malfunction occurred that includes: <ul style="list-style-type: none"> • 10.5.5.1 - a description of the changes made to avoid a subsequent occurrence of the accident or malfunction; • 10.5.5.2 - the modified or additional measure(s) implemented by the Proponent to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation, taking into account the information submitted in the written report pursuant to condition 10.5.3; and • 10.5.5.3 - all additional views from Indigenous groups and advice from relevant authorities received by the Proponent since the views and advice referred to in condition 10.5.3.3 were received by the Proponent. 	<p>Marathon has developed an Accidents and Malfunctions Prevention and Response Plan, that was finalized prior to construction, to address all pertinent information required by conditions 10.1, 10.3, 10.5 and 10.6. The plan will provide guidance to all personnel on the collection and communication of critical information necessary to respond to the accident or malfunction, notification of and communication with Indigenous groups as required by the communication plan referenced in condition 10.6, the Agency and any other relevant authorities, and reporting requirements, including the report referenced in condition 10.5.5. As noted in the commentary on condition 10.3, both Miawpukek and Qalipu are being consulted in development of the plan. Marathon will incorporate the results of consultation where appropriate per conditions 2.3 and 2.4.</p>	<p>Initiated prior to construction and continuing over the life of the Project as applicable.</p>
10.6 (and all sub-conditions 10.6.1 to 10.6.3)	<p>The Proponent shall develop, in consultation with Indigenous groups, a communication plan for Designated Project accidents and malfunctions. The Proponent shall develop the communication plan prior to construction and shall implement and keep it up to date during all phases of the Designated Project. The plan shall include:</p> <ul style="list-style-type: none"> • 10.6.1 - the types of accidents and malfunctions requiring the Proponent to notify the Indigenous groups; • 10.6.2 - the manner by which Indigenous groups shall be notified by the Proponent of an accident or malfunction and of any opportunity for the Indigenous groups to assist in the response to the accident or malfunction; and • 10.6.3 - the names and contact information of the Proponent and Indigenous group representatives for the purposes of notifying pursuant to condition 10.6.2 and communicating about accidents and malfunctions. 	<p>Marathon has developed a communication plan for accidents and malfunctions, as a component of the accidents and malfunctions prevention and response plan. Information regarding planning for prevention of and response to accidents and malfunctions, including the communication plan component, was provided to Miawpukek and Qalipu for review on July 8, 2022, and comments have been received from each group. Marathon has reviewed these comments and has offered to meet with each group to discuss the information and any issues of concern. Miawpukek and Qalipu have been advised as to how their comments have been taken into account, including incorporating results of consultation where appropriate as per conditions 2.3 and 2.4. The communication plan will be implemented and updated throughout the phases of the Project, including the following components:</p> <ul style="list-style-type: none"> • A process, including criteria, for the identification of the types of accidents and malfunctions which will be the subject of notification to Indigenous groups; • Reporting process, including method, format, content and timing of Marathon's notification to Indigenous groups; • Identification and contact information of the Marathon and Indigenous group representatives for purposes of notification and communication; and • Procedures for updating the plan. 	<p>Initiated June 2022 and continuing until rehabilitation and closure.</p>
11 Schedules			
11.1	<p>The Proponent shall submit to the Agency and Indigenous groups a schedule for all conditions set out in this Decision Statement no later than 30 days prior to the start of construction. This schedule shall detail all activities planned to fulfill each condition set out in this Decision Statement and the commencement and estimated completion month(s) and year(s) for each of these activities.</p>	<p>The report presenting the schedule for all conditions was submitted to the Agency and Indigenous groups in August 2022, earlier than required 30 days in advance of the planned construction start date. It detailed all activities planned to fulfill each condition, with commencement and estimated completion months and years for each activity.</p>	<p>Completed-August 2022</p>
11.2	<p>The Proponent shall submit to the Agency and Indigenous groups a schedule outlining all activities required to carry out all phases of the Designated Project no later than 30 days prior to the start of construction. The schedule shall indicate the commencement and estimated completion month(s) and year(s) and duration of each of these activities.</p>	<p>A schedule outlining all activities required to carry out all phases of the Designated Project was prepared and submitted to the Agency and Indigenous groups in August 2022, earlier than required 30 days in advance of the planned construction start date. The level of detail and timing for the implementation of specific activities were provided to the extent possible.</p>	<p>Completed-August 2023</p>
11.3	<p>The Proponent shall submit to the Agency and Indigenous groups in writing an update to schedules referred to in conditions 11.1 and 11.2 every year no later than March 31, until completion of all activities referred to in each schedule.</p>	<p>An update to the schedules referred to in conditions 11.1 and 11.2 will be submitted to the Agency every year no later than March 31, until all activities referred to in each schedule are complete. Refer to Appendix C for the updated Project schedule.</p>	<p>March 31, 2023 and March 31 every subsequent until completion of all activities referred to in each schedule</p>




VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD
APPENDIX A - CONDITION IMPLEMENTATION ACTIVITIES


Version: 0.0

Date: March 2023

Condition Number	Condition	Implementation Activities Undertaken	Schedule
12 Recordkeeping			
12.1	The Proponent shall maintain all records relevant to the implementation of the conditions set out in this Decision Statement. The Proponent shall retain the records and make them available to the Agency throughout construction and operation and for 25 years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall provide the aforementioned records to the Agency upon demand within a timeframe specified by the Agency.	Records relevant to the implementation of the conditions will be maintained and retained for 25 years following the end of operation, or until the end of decommissioning of the Project, as required. Records will be provided to the Agency upon request.	Ongoing, to continue 25 years following end of operation or until end of decommissioning
12.2	The Proponent shall retain all records referred to in condition 12.1 at a facility in Canada and shall provide the address of the facility to the Agency. The Proponent shall notify the Agency at least 30 days prior to any change to the physical location of the facility where the records are retained, and shall provide to the Agency the address of the new location.	All records referred to in condition 12.1 will be retained in Canada at Marathon's corporate office: 36 Lombard Street Suite 600 Toronto, ON M5C 2X3 Marathon will notify the Agency if there is a change to the physical location of the facility retaining the records at least 30 days prior to any change, and the new address will be provided to the Agency.	Ongoing, to continue 25 years following end of operation or until end of decommissioning
12.3	The Proponent shall notify the Agency of any change to the contact information of the Proponent.	The Agency will be notified if there is a change to the contact information of the Proponent. No changes are anticipated at this time.	Ongoing, as applicable

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Appendix B INDIGENOUS ENGAGEMENT SUMMARY

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD APPENDIX B - INDIGENOUS ENGAGEMENT SUMMARY	Version: 0.0
		Date: March 2023

A. Schedules

Sections 11.1 and 11.2 of the Conditions require the Proponent to submit to both the Agency and Indigenous groups two schedules: an implementation schedule detailing all activities planned to fulfill each Condition, including a commencement and completion date; and a schedule outlining all activities required to carry out all Phases of the Project, including commencement and completion dates and duration of each activity. Both schedules were provided to Miawpukek and Qalipu on June 30, 2022. No comments have been received to date.


As part of the ongoing engagement with Indigenous groups, advance quarterly notices have been provided regarding upcoming project activities in the upcoming quarter, predicted effects and associated mitigations. During the reporting period, one quarterly notice was issued (Q4 2022) and neither Indigenous group expressed any issues or concerns to date.

B. Follow-up Programs and Plans

On May 26, 2022, the Impact Assessment Agency of Canada filed a draft EA Report and accompanying draft conditions (Draft Conditions) for EA release for the Project. The Draft Conditions set out the regulator’s requirements for several follow-up monitoring programs and plans, and stipulated a specific consultation process with regulators and both Miawpukek and Qalipu regarding the following:

- Fish and Fish Habitat Follow-Up Program
- ARD/ML Follow-Up Program
- Avifauna Follow-Up Program
- Air, Water and Country Foods Follow-Up Program (Effects of Changes on Indigenous Health)
- Communication Plan, Current Use of Lands and Resources for Traditional Purposes
- Accidents and Malfunctions Response and Communications Plan

The elements of the required consultation process were set out in section 2.4 of the draft Conditions and required the proponent to communicate with each Indigenous group with respect to the consultation requirements, including methods of notification, the type of information and the period of time to be provided when seeking input, and the process for the proponent’s consideration of Indigenous comments on the subject matter of the consultation. Pursuant to Draft Condition 2.4 and based on the good working relationship with both Indigenous groups, Marathon wrote to both Chiefs on June 14, 2022, to discuss a possible joint consultation process supported by capacity funding from Marathon on the basis of the draft Conditions. This correspondence was followed up by separate phone calls to each Chief to determine their acceptance of this proposal. As both Chiefs indicated a preference for a separate consultation process, Marathon proceeded to work with each group through phone calls, emails and in the case of Qalipu, a virtual meeting, to develop an agreed-upon process establishing a method of notification, schedule for provision of information, method and period of review, and provision and amount of capacity funding to support Indigenous review of specific plans.


	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD APPENDIX B - INDIGENOUS ENGAGEMENT SUMMARY	Version: 0.0
		Date: March 2023

Copies of draft programs and plans were provided to each group on the following dates with comments to be provided within the mutually agreed time frames:


- June 30, 2022: Fish Habitat Monitoring Plan; Groundwater Monitoring Plan; and Surface Water Monitoring Plan;
- July 6, 2022: Country Foods Monitoring Plan; Air Quality Monitoring Plan; and Avifauna Monitoring Plan;
- July 8, 2022: Current Use of Lands and Resources for Traditional Purposes Indigenous Communications Plan; and Accidents and Malfunctions Response Plan (including an Indigenous Communication Plan); and
- July 11, 2022: Acid Rock Drainage and Metal Leaching Management Plan (ARD/MLMP).

Comments on the draft plans were received from Qalipu on July 29, 2022, and from Miawpukek on August 2, 2022. Receipt of Indigenous comments was followed by phone calls and emails between Marathon and each Indigenous group to discuss comments or request clarification of certain points. As required by section 2.4 of the Conditions, each group has been provided with copies of the final Plans and has been advised as to how their comments in relation to specific plans were incorporated and, where comments were not incorporated, the rationale for non-incorporation.

Indigenous group comments pertaining directly to the plans have been fully considered by Marathon and are summarized in the table below. Where appropriate, revisions to plans have been made in response to issues identified by each group as set out in the table below. NOTE: the titles of the plans were revised during the review process and the current titles are provided under the Follow-up Program or Plan column in the table below.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD APPENDIX B- INDIGENOUS ENGAGEMENT SUMMARY	Version: 0.0
		Date: March 2023

	Follow-up Program or Plan	Summary of Comments and Issues Identified	Summarized Response
Qalipu	Fish and Fish Habitat Follow-up Monitoring Program (FFHFMP)	Comments were related to the biological monitoring of the fish habitat (e.g., concentration of contaminants, potential effluent effects during low water levels, impacts of spills in terms of spatial boundaries) and communication protocols.	<p>Communications: Marathon revised the FFHFMP to reference the Accidents and Malfunctions Prevention and Response Plan (AMPRP). The AMPRP outlines the mitigation measures and response measures for potential accidents and malfunctions and describes the communication protocols with Qalipu. Additionally, action (e.g., enhanced sampling) is taken when a given parameter exceeds a trigger threshold, irrespective of the cause (accident, malfunction, extreme weather, or other).</p> <p>Low flow effects: The assimilative capacity effluent assessment (Appendix 7C of the EIS, Marathon 2020), considered a regulatory condition of effluent discharge which included effluent discharge under low water conditions (i.e., August when receivers are typically warmest). Monitoring (sampling timing) will capture low flow periods.</p> <p>Spatial Boundaries: The program is intended to verify the accuracy of the environmental assessment, and therefore the spatial boundaries must remain as those in the EIS. Spatial boundaries for accidental events will be commensurate with the significance of the event, per the AMPRP.</p>
		Qalipu requested the inclusion of maps containing proposed sample sites.	Marathon revised the FFHFMP to include maps with sampling locations.
	Acid Rock Drainage and Metal Leaching Management Plan (ARD/MLMP)	Comments related to unplanned effluent releases and/or exceedances of the MDMER limits for effluent discharge to water ways, and communication protocols.	<p>Communications: The ARD/MLMP was revised to reference the AMPRP. The AMPRP outlines the mitigation measures and response measures for potential accidents and malfunctions and describes the communication protocols with Qalipu.</p> <p>Unplanned or Out of Compliance Effluent Release: Action (e.g., enhanced sampling, adaptive mitigation) is taken when a given parameter exceeds a trigger threshold, irrespective of the cause (accident, malfunction, extreme weather, or other).</p>

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD APPENDIX B- INDIGENOUS ENGAGEMENT SUMMARY	Version: 0.0
		Date: March 2023

	Follow-up Program or Plan	Summary of Comments and Issues Identified	Summarized Response
Qalipu	Avifauna Follow-up Monitoring Program (AFMP)	Comments related to reporting of unusual bird behaviour or mortalities, effects of accidental events, and the deterrence of birds from potentially impacted Project areas.	<p>Deterrence and monitoring: Marathon revised the AFMP to include adaptive management and actively deterring birds. Additionally, action (e.g., enhanced sampling, additional monitoring) is taken when a given parameter exceeds a trigger threshold such as bird mortality, irrespective of the cause (accident, malfunction, extreme weather, or other).</p> <p>Reporting: Marathon's internal reporting protocols (outlined in the EIS, described in the Environmental Protection Plan, and specified in the requisite Site Orientation for all personnel) include reporting unusual sightings, such as collisions with Project infrastructure or the discovery of a nest, to the on-site Environment Team.</p> <p>Accidental Events: The AFMP has been revised to reference AMPRP. The AMPRP outlines the mitigation measures and response measures for potential accidents and malfunctions and describes the communication protocols with Qalipu</p>
	Country Foods Follow-up Monitoring Program (CFFMP)	Comments related to potential contamination of country foods and water via the movement of fish and animal species in and out of the Project Local Assessment Area (LAA), low flow water quality conditions, and communication protocols.	<p>Low flow effects: The assimilative capacity effluent assessment (Appendix 7C of the EIS, Marathon 2020), considered a regulatory condition of effluent discharge which included effluent discharge under low water conditions (i.e., August when receivers are typically warmest). Monitoring (sampling timing) will capture low flow periods. Short-term changes in water quality are not expected to result in substantive changes in risk via consumption for people, and monitoring during extreme drought is more relevant in terms of risk to fish health than a risk to people via country foods.</p> <p>Migration of Fish and Wildlife: The CFFMP reflects the conceptual models described in the Country Foods Baseline study and the Human Health Risk Assessment (HHRA). A statement was included noting that while both people and animals would be expected to move in and out of the Local Assessment Area (LAA), it is conservatively assumed that 100% of exposures occur within the LAA, which will overstate, rather than understate, the risk as actual exposures would be lower if people spend</p>




**VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD
APPENDIX B- INDIGENOUS ENGAGEMENT SUMMARY**


Version: 0.0

Date: March 2023

	Follow-up Program or Plan	Summary of Comments and Issues Identified	Summarized Response
Qalipu	Country Foods Follow-up Monitoring Program (CFFMP)	Comments related to potential contamination of country foods and water via the movement of fish and animal species in and out of the Project Local Assessment Area (LAA), low flow water quality conditions, and communication protocols.	time outside the LAA. The CFFMP focuses on the primary exposure media that represent pathways for both people and wildlife (i.e., soil, water, terrestrial plants) at locations in the LAA most likely to be affected by Project activities. Accidental Events and Communications: The CFFMP was revised to reference the AMPRP. The AMPRP outlines the mitigation measures and response measures for potential accidents and malfunctions and describes the communication protocols with Qalipu. Additionally, action (e.g., enhanced sampling) is taken when a given parameter exceeds a trigger threshold, irrespective of the cause (accident, malfunction, extreme weather, or other).
	Ambient Air Quality Follow-up Monitoring Program (AAQFMP)	Comment related to implementation of monitoring and mitigation should traffic increase significantly.	No revisions to the AAQFMP. Any changes from the parameters (e.g. traffic loads) assessed in the EIS must be reported to IAAC and NLDECC EA Division and assessed to determine potential effects, changes in mitigation and monitoring requirements.
	Surface Water Follow-up Monitoring Program (SWFMP)	Comments related to exceedances of the MDMER limits or increase in effluent discharge to water ways, and communication protocols.	The SWFMP was revised to reference AMPRP. The AMPRP outlines the mitigation measures and response measures for potential accidents and malfunctions and describes the communication protocols with Qalipu. Additionally, action (e.g., enhanced sampling) is taken when a given parameter exceeds a trigger threshold, irrespective of the cause (accident, malfunction, extreme weather, or other)
	Groundwater Follow-up Monitoring Program (GWFMP)	Comment related to the addition of a threshold for change in vegetation health.	Groundwater measurements and surface water flow across the site will support evaluation of wetland and vegetation assessments required via other commitments.
	Current Use of Lands and Resources for Traditional Purposes Indigenous Communications Plan	Comments related to the prevention, detection and mitigation of environmental events, and associated communication protocols.	Prevention of Accidental Events: The AMPRP describes prevention with respect to using rigorous planning and design, and construction methodology. The other critical aspect of prevention is the follow-up and monitoring described in these various plans. All plans have been updated to reference the AMPRP and how these plans work together to prevent accidental events.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD APPENDIX B- INDIGENOUS ENGAGEMENT SUMMARY	Version: 0.0
		Date: March 2023

	Follow-up Program or Plan	Summary of Comments and Issues Identified	Summarized Response
Qalipu	Current Use of Lands and Resources for Traditional Purposes Indigenous Communications Plan	Comments related to the prevention, detection and mitigation of environmental events, and associated communication protocols.	Communications: The AMPRP outlines the mitigation measures and response measures for potential accidents and malfunctions and describes the communication protocols with Qalipu.
		Comments related to notifications, project involvement, ongoing engagement, and mechanisms for providing feedback.	Quarterly notices to Indigenous groups pursuant to the Current Use of Lands and Resources for Traditional Purposes Indigenous Communications Plan (the Plan) of planned Project activities and include identification of potential effects and mitigations. Also, via the Socio-Economic Agreement, the established Environmental Stewardship Committee's mandate is to review and discuss general environmental aspects of the Project, Qalipu involvement in the Project, specific concerns, environmental monitoring, and accidental events and resulting mitigations. The Plan has been revised to provide clarification regarding communication of information and provision of feedback through ongoing engagement processes.
		Comments related to AMPRP references and classification of the consequences of incidents	AMPRP References: All programs and plans have been revised to reference the AMPRP per the comments provided. Consequence Classification: Consequences within the Project Area are consistent with criteria, however, as described, timely duty of notification will apply where potential for downstream effects occur. The Qalipu Environmental Stewardship Committee will be notified in all cases and can communicate with Qalipu members.
	All Plans and Programs	Comment related to training of on-site Indigenous environmental staff.	No revision to the (AMPRP), as the current language stipulates appropriate training for all Environmental Technicians.
	All Plans and Programs	Comments related to employment and research.	The Qalipu SEA contains provisions respecting environmental stewardship, and Indigenous engagement and communication, including a joint Environmental Stewardship Committee. Marathon and Qalipu will discuss participation in environmental monitoring/research as part of SEA discussions.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD APPENDIX B- INDIGENOUS ENGAGEMENT SUMMARY	Version: 0.0
		Date: March 2023

	Follow-up Program or Plan	Summary of Comments and Issues Identified	Summarized Response
Qalipu	All Plans and Programs	Inquiry regarding precipitation and runoff events analysis used for water containment and drainage infrastructure.	Detailed analysis is provided in the environmental assessment documents, including the EIS, addenda and appendices, and responses to federal information requirements.
		Comment related to linking relevant sections of one plan to another.	Marathon has revised all monitoring programs and plans to include a document reference section. The section contains a Table of relevant documents with associated summaries to help the reader understand how the various plans link together.
Miawpukek	Fish and Fish Habitat Follow-up Monitoring Program (FFHFMP)	Comments related to sediment and erosion control.	Marathon revised Section 4.1 of the FFHFMP to require that erosion and sediment control structures are inspected, maintained, and functioning as a performance target.
		Comments related to culvert design and construction.	No revision to the FFHFMP required, information on culvert design and construction provided.
		Comments related to stream crossings and acceptable water velocities for fish swimming performance.	The FFHFMP was not revised – information provided with respect to the determination and monitoring of velocities.
		Comment related to maintenance of riparian buffers.	Marathon is committed to maintaining riparian buffers to the extent practicable.
		Comments related to the Fisheries Act offsetting plan development and inclusion of language in the FFHMP.	The FFHMP was revised to include the quantifiable information regarding the offsetting requirements and plan.
		Comments related to EEM study methodology.	Marathon has taken the added step (not required under MDMER) of collecting baseline EEM data prior to mine development and will be used to evaluate potential environmental effects via a before-after-control-impact study design.



**VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD
APPENDIX B- INDIGENOUS ENGAGEMENT SUMMARY**

Version: 0.0

Date: March 2023

	Follow-up Program or Plan	Summary of Comments and Issues Identified	Summarized Response
Miawpukek	Fish and Fish Habitat Follow-up Monitoring Program (FFHFMP)	Comments related to stabilization of soils and overburden stockpiles to prevent sediment entering fish habitat.	Marathon has committed to stockpile stabilization, water management infrastructure, and buffers to waterbodies throughout the EIS and Mining Act approvals (Development and Rehabilitation & Closure Plans) to manage sediment prior to effluent discharge over the life of mine.
	Acid Rock Drainage and Metal Leaching Management Plan (ARD/MLMP)	Comments (general and specific) related to the adequacy of the ARD/ML assessment, effluent discharge criteria used, and consideration of assimilative capacity of the receiver.	Technical information/explanation provided in response, including reference to the assessment provided in the EIS and supporting EA documentation.
		Comments related to the use of on-site, static ARD and short-term ML testing to confirm ARD/ML potential of construction rock. Also, the use of field and laboratory kinetic tests, and additional site water monitoring to confirm construction rock is not potentially acid generating or metal leaching.	Technical information/explanation and revisions to the ARDMLMP were completed to address these comments as they relate to ensuring waste rock used in construction does not result in ARD/ML effects to receiving environment. Chemical analysis is to be conducted on contact water and/or leachates from construction rock. In addition, Marathon has been and will continue to monitor field bin tests. In accordance with adaptive management, exceedances of trigger levels will be assessed and addressed (further mitigation and management measures as required).
		Comments related to the confirmatory sampling frequency of tailings and further kinetic testing of tailings.	The ARD/MLMP has been revised to include extending the initial sampling frequency throughout the life of mine, except where unsafe to do so (pit disposal). Field sample testing in place of kinetic lab testing is recommended.
		Comment related to coverage of permanently exposed PAG walls.	Based on updated modelling, there is not expected to be PAG materials exposed above the flooded level of the pit. If confirmatory testing shows PAG materials are exposed in the high wall, retreat mining can be conducted during closure to lower the slope to allow proper, stable cover.



**VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD
APPENDIX B- INDIGENOUS ENGAGEMENT SUMMARY**

Version: 0.0

Date: March 2023

	Follow-up Program or Plan	Summary of Comments and Issues Identified	Summarized Response
Miawpukek	Acid Rock Drainage and Metal Leaching Management Plan (ARD/MLMP)	Comments related to testing criteria and thresholds for contact water and implementation of adaptive management.	Rationale for use of MDMER limits provided in earlier response to general comments on effluent discharge criteria. Changes in sample test results, and criterion will be applied to trigger thresholds.
		Comments related to testing criteria and thresholds for contact water and implementation of adaptive management.	Rationale for use of MDMER limits provided in earlier response to general comments on effluent discharge criteria. Changes in sample test results, and criterion will be applied to trigger thresholds.
	Avifauna Follow-up Monitoring Program (AFMP)	Comment related to the estimate of habitat loss for the Common Nighthawk	There is no evidence that Common Nighthawks breed on the island of Newfoundland, which in turn means that habitat loss estimates for this species are not needed.
		Comments related to bird monitoring methodology testing criteria and schedule/frequency.	Revised approaches and additional information on the breeding bird survey, point count and ARU surveys are provided in the AFMP based on the comments provided by Miawpukek and CWS. The requirement for future (ongoing) bird monitoring during Project will be evaluated through consultation with the Canadian Wildlife Service (CWS).
		Comments related to measurable parameters used to trigger mitigation response and adaptive management.	Based on comments provided by Miawpukek and CWS, a revised approach using standardized methods to detect changes over time in species at risk occupancy, species richness, and breeding density that will be used to evaluate Project-specific effects. The AFMP now also includes incorporation of an adaptive management process (that is built into the Decision Triggers / Thresholds for Action section). Habitat productivity modelling is not necessary to evaluate Project-specific effects on birds.
		Comments related to avifauna mortality monitoring measures (personnel training, monitoring locations, modelling)	Additional information is provided in the AFMP with respect to mortality monitoring that includes implementing additional mitigation measures through the adaptive management framework for addressing unforeseen mortality risk pathways. Standardized monitoring, outside of the Surface Water Monitoring and modeling are not proposed as there is little uncertainty following the assessment of Project residual effect on mortality risk.



**VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD
APPENDIX B- INDIGENOUS ENGAGEMENT SUMMARY**

Version: 0.0

Date: March 2023

	Follow-up Program or Plan	Summary of Comments and Issues Identified	Summarized Response
Miawpukek	Avifauna Follow-up Monitoring Program (AFMP)	Comment related to definition of sensitive feature types and mitigation buffers.	Buffer requirements are anticipated to vary by species and circumstance but will be established based on best practices and consultation with a qualified biologist, as required.
		Comments related to the installation of anti-collision measures.	Construction of the hydroelectric distribution lines will be undertaken in accordance with standardized Newfoundland Hydro construction practices. As noted above, mortality monitoring that includes implementing additional mitigation measures through the adaptive management framework for addressing unforeseen mortality risk pathways.
	Country Foods Follow-up Monitoring Program (CFFMP)	No comments	Not applicable.
	Ambient Air Quality Follow-up Monitoring Program (AAQFMP)	Comments related to adding testing parameters (metals).	Marathon included additional sampling parameters (trace metals).
		Comments related to air sampling equipment and locations.	Regulatory consultation is required prior to finalizing the air monitoring locations. The real-time equipment required by the province will be based on specific monitoring method requirements, based on recommendations by the regulators.
		Comments related to exceedances of particulate matter (PM10) criteria and availability of monitoring data.	Marathon revised the AAQFMP to add content regarding data assessment, response framework and trigger action response levels. In addition, Marathon will consult with the province regarding making real time data available to the community, and the results of monitoring will be communicated in a timely manner.
		Comments related to adaptive management triggers and mitigations	Additional technical was added to the AAQFMP with respect to data assessment and response framework/triggers.
	Surface Water Follow-up Monitoring Program (SWFMP)	Comments related to the effluent discharge quality limits and frequency of effluent sampling.	MDMER is a federal regulation applied widely in Canada with respect to effluent quality limits and pollutants of potential concern. Monitoring criteria and frequency proposed in the SWFMP are appropriate to identify potential trends in monitored parameters.




**VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD
APPENDIX B- INDIGENOUS ENGAGEMENT SUMMARY**


Version: 0.0

Date: March 2023


	Follow-up Program or Plan	Summary of Comments and Issues Identified	Summarized Response
Miawpukek	Surface Water Follow-up Monitoring Program (SWFMP)	Comments related to sampling and testing for mercury and methyl mercury.	Assessment work completed to date is described and commitments for assessing and testing for methyl mercury are provided in the EIS and FFHMP. The CFFMP also focuses on metals, including total mercury.
		Comments related to water quality sampling locations and ditching to collect runoff from stockpiles.	Ditching: the only sections of stockpile perimeter where no ditching is design are upgradient of the stockpiles, all side and down gradient areas are ditched. Generally, site water management (ditching and final discharge points) are designed to meet specific objectives and generally maintain existing surface water flow patterns across the site for wetlands and fish habitat. Water Quality Sampling Locations: proposed locations were selected to align with provincial and federal (MDMER, including EEM and the Fisheries Act Authorization) requirements and locations for real time monitoring stations are selected in consultation and approval by the NLDECC Water Resources Management Division. Locations are also selected to confirm the receiver mixing zone predictions in the EIS.
	Groundwater Follow-up Monitoring Program (GWFMP)	Comments related to groundwater sampling criteria/triggers and the number and location of wells and timing of installation.	Additional criteria and information regarding triggers, as well as additional well locations were added to the GWFMP in response to these comments. Groundwater baseline data has been collected from existing boreholes and monitor wells across the site, additional monitor wells will be installed prior to construction of site components.
		Comments related to identifying and monitoring natural springs.	Artesian conditions were only encountered once during exploration and site engineering/field studies; this does not necessarily imply the presence of natural springs. Monitoring is typically conducted when the water is a primary source of drinking water and there are no known groundwater users in the Project Area.
		Comments related to testing criteria and trigger thresholds for adaptive management.	Additional information on existing criteria and thresholds provided, including the addition of guideline criteria (Ontario Aquatic Protection Value).
		Comment related to the monitoring period post-closure.	Additional information provided to clarify that monitoring post-closure is results-based, not specifically time-based.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD APPENDIX B- INDIGENOUS ENGAGEMENT SUMMARY	Version: 0.0
		Date: March 2023

	Follow-up Program or Plan	Summary of Comments and Issues Identified	Summarized Response
Miawpukek	Current Use of Lands and Resources for Traditional Purposes Indigenous Communications Plan	Comments related to the timing for provision of notice of upcoming Project activities and timing for provision of Indigenous comments.	The timelines in the Current Use of Lands and Resources for Traditional Purposes Indigenous Communications Plan respecting provision of notice and submission of Indigenous comments have been extended.
		Comment relating to relationship of any concluded Socio-Economic Agreement to the Plan.	The plan has been revised to clarify the relationship between the Plan and any concluded Socio-Economic Agreement.
	Accidents and Malfunctions Prevention and Response Plan (AMPRP)	Comment related to establishment of an Independent Tailings Review Board (ITRB) or a similar independent review process to provide oversight and recommendations on tailings management.	Marathon established an ITRB in 2021 and the ITRB has reviewed all aspects of Marathon's TMF life of mine design from the feasibility level onward. The ITRB has the power to make recommendations, and Marathon is committed to following the recommendations of the ITRB. Reports from the ITRB may be provided to regulators or other parties based on regulatory requirements and/or agreements with non-regulatory parties.
Comments related to communication of incidents – assigned personnel and contact information.		Per Table 3-1, the “Environmental Department” is responsible for external communications in the event of an accident or malfunction. This includes regulators, Indigenous groups, communities, stakeholders, and others as required, for which contact information for all is maintained. There is no single Marathon employee tasked to complete these communications as this is impractical for various reasons, including the different types of accidents or malfunctions, and the site rotation requirements. As Marathon has and will continue to expand its personnel as construction ramps up and moves into operations. Marathon will review update Table 3-1 and the appended Indigenous Communications Plan, as required, based on updates to personnel and/or communications procedures.	

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD APPENDIX B- INDIGENOUS ENGAGEMENT SUMMARY	Version: 0.0
		Date: March 2023

	Follow-up Program or Plan	Summary of Comments and Issues Identified	Summarized Response
Miawpukek	Accidents and Malfunctions Prevention and Response Plan (AMPRP)	Comment related to email notification of Miawpukek Natural Resources Director for accidents/malfunctions with medium and high categories.	The AMPRP Appendix A has been updated as requested.

	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2022 REPORTING PERIOD	Version: 0.0
		Date: March 2023

Appendix C CONSTRUCTION SCHEDULE

VALENTINE PROJECT - LEVEL 2 SCHEDULE Construction Activities

Activity ID	Activity Name	Original Duration	Start	Finish	2022												2023												2024												2025															
					May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb																		
Valentine Gold Project																																																								
Valentine Gold Project																																																								
Project Milestones																																																								
Infrastructure																																																								
MP-1910	NL Hydro - Permanent Power available	0	01-Oct-23	01-Oct-23																																																				
Procurement																																																								
MP-2790	Pre-Engineered Process Building - Delivered to site	0	08-Aug-23	08-Aug-23																																																				
MP-2810	Main E-Room - Delivered to site	0	19-Oct-23	19-Oct-23																																																				
MP-2800	SAG & Ball Mill - Delivered to site	0	08-Jan-24	08-Jan-24																																																				
MP-2820	GE Motors & Drives (Mills) - Delivered to site	0	25-Mar-24	25-Mar-24																																																				
Construction																																																								
MP-1960	CC4101 - "Maintenance" works start - Access Road	0	16-Aug-21 A	16-Aug-21 A																																																				
MP-1450	Commencement of Temporary Camp Installation	0	25-Jul-22 A	25-Jul-22 A																																																				
MP-2090	TK3905 - Temporary Construction Camp complete	0	04-Oct-22 A	04-Oct-22 A																																																				
MP-1980	CC4103 - Victoria River Bridge works start	0	05-Oct-22 A	05-Oct-22 A																																																				
MP-2650	Mobilisation to Site - Construction Start - Early Works	0	05-Oct-22 A	05-Oct-22 A																																																				
MP-1970	CC4102 - Upgrade works start - Access Road	0	05-Oct-22 A	05-Oct-22 A																																																				
MP-1990	CC0001 - Tree Cutting works - start	0	05-Oct-22 A	05-Oct-22 A																																																				
MP-2060	CC3001 - Major Earthwork works start	0	12-Oct-22 A	12-Oct-22 A																																																				
MP-2750	Victoria River Bridge replacement complete	0	25-Nov-22 A	25-Nov-22 A																																																				
MP-1500	Commencement of construction - Execution Phase	0	30-Jan-23	30-Jan-23																																																				
MP-2760	Process Plant Pad complete	0	28-Mar-23	28-Mar-23																																																				
MP-2105	TK3901 / TK3902 - Accommodation Complex - First 352 Beds Available	0	11-Apr-23	11-Apr-23																																																				
MP-2730	Concrete Batch Plant Setup Start	0	22-Apr-23	22-Apr-23																																																				
MP-2040	TK3301 - Telecommunication Infrastructure - Construction Complete	0	03-Jun-23	03-Jun-23																																																				
MP-2110	TK3901 / TK3902 - Accommodation Complex Complete (425 Beds)	0	10-Jun-23	10-Jun-23																																																				
MP-2770	Main Foundations completed - SAG & Ball Mill	0	29-Aug-23	29-Aug-23																																																				
MP-2740	Process Building Closed.	0	07-Nov-23*	07-Nov-23*																																																				
MP-2780	SAG & Ball Mill - Mechanical Completion	0	04-Jul-24	04-Jul-24																																																				
MP-2080	TMF Construction complete - Stage 1	0	11-Jul-24	11-Jul-24																																																				
MP-1920	Mechanical Completion - Valentine Project	0	02-Sep-24	02-Sep-24																																																				



VALENTINE PROJECT - LEVEL 2 SCHEDULE

Construction Activities

14-Feb-23 14:11

Activity ID	Activity Name	Original Duration	Start	Finish	2022												2023												2024												2025	
					May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb				
CG1101-1520	Stripping & Grubbing - Marathon Topsoil Stockpile Footprint	13	11-Apr-23	30-Apr-23													Stripping & Grubbing - Marathon Topsoil Stockpile Footprint																									
CG1101-1500	Stripping & Grubbing - Marathon Overburden Stockpile Footprint	9	14-May-23	23-May-23													Stripping & Grubbing - Marathon Overburden Stockpile Footprint																									
CG1101-1540	Stripping & Grubbing - High Grade Ore stockpile Pad	20	13-Jul-23	02-Aug-23													Stripping & Grubbing - High Grade Ore stockpile Pad																									
CG1101-1580	Stripping & Grubbing - Marathon Waste Rock Stockpile Starter Area	26	16-Sep-23	12-Oct-23													Stripping & Grubbing - Marathon Waste Rock Stockpile Starter Area																									
CG1101-1560	Stripping & Grubbing - Marathon Low Grade Ore Stockpile Pad	20	28-Sep-23	18-Oct-23													Stripping & Grubbing - Marathon Low Grade Ore Stockpile Pad																									
1140 - Pit Pre-Stripping		508	05-Oct-22 A	10-Oct-24																																						
Topsoil Stripping		290	05-Oct-22 A	25-Oct-23																																						
CG1101-1140	Topsoil Stripping from Leprechaun Phase 1 Open Pit	83	05-Oct-22 A	03-Feb-23	Topsoil Stripping from Leprechaun Phase 1 Open Pit																																					
CG1101-1870	Topsoil Stripping from Leprechaun Low Grade Ore SP	10	28-Feb-23	11-Mar-23	Topsoil Stripping from Leprechaun Low Grade Ore SP																																					
CG1101-1120	Topsoil Stripping from Marathon Phase 1 Open Pit	136	15-May-23*	19-Oct-23	Topsoil Stripping from Marathon Phase 1 Open Pit																																					
CG1101-1830	Topsoil Stripping from Leprechaun WRSF	25	15-May-23	12-Jun-23	Topsoil Stripping from Leprechaun WRSF																																					
CG1101-1890	Topsoil Stripping from High Grade Ore SP	17	02-Aug-23	22-Aug-23	Topsoil Stripping from High Grade Ore SP																																					
CG1101-1160	Topsoil Stripping from toe of Marathon WRSF Starter Area	25	26-Sep-23	25-Oct-23	Topsoil Stripping from toe of Marathon WRSF Starter Area																																					
CG1101-1880	Topsoil Stripping from Marathon Low Grade Ore SP	18	28-Sep-23	19-Oct-23	Topsoil Stripping from Marathon Low Grade Ore SP																																					
Pit Dewatering for Pre-Stripping - Leprechaun Pit		84	28-Oct-22 A	31-Jan-23																																						
CG1101-DE-130	Stage 1 - AREA 57,560 m2	84	28-Oct-22 A	31-Jan-23	Stage 1 - AREA 57,560 m2																																					
CG1101-DE-140	STAGE 2 - AREA 366,825 m2	84	28-Oct-22 A	31-Jan-23	STAGE 2 - AREA 366,825 m2																																					
CG1101-DE-150	Stage 3 - AREA 222,359m2	84	28-Oct-22 A	31-Jan-23	Stage 3 - AREA 222,359m2																																					
Pit Dewatering for Pre-Stripping - Marathon Pit - Phase 1		77	01-Jul-23	15-Sep-23																																						
CG1101-DE-100	STAGE 1 - AREA 318,323 m2	46	01-Jul-23	16-Aug-23	STAGE 1 - AREA 318,323 m2																																					
CG1101-DE-110	STAGE 2 - AREA 366,825 m2	46	01-Jul-23	16-Aug-23	STAGE 2 - AREA 366,825 m2																																					
CG1101-DE-120	STAGE 3 - AREA 467,339 m2	77	01-Jul-23	15-Sep-23	STAGE 3 - AREA 467,339 m2																																					
Sedimentation Ponds - Leprechaun Pit		321	15-Oct-23	30-Aug-24																																						
CG1101-WM-150	Construct Overburden Stockpile Pond LP-SP-03C	46	15-Oct-23	29-Nov-23	Construct Overburden Stockpile Pond LP-SP-03C																																					
CG1101-WM-170	Construct Low Grade Ore Stockpile Pond LP-SP-01	30	15-Oct-23	13-Nov-23	Construct Low Grade Ore Stockpile Pond LP-SP-01																																					
CG1101-WM-160	Construct Topsoil Stockpile Pond LP-SP-01B	36	25-Oct-23	29-Nov-23	Construct Topsoil Stockpile Pond LP-SP-01B																																					
CG1101-WM-140	Construct High Grade Ore Stockpile Pond LP-SP-03C	30	01-May-24*	30-May-24	Construct High Grade Ore Stockpile Pond LP-SP-03C																																					
CG1101-WM-180	Construct Waste Rock Stockpile Pond LP-SP-02A	29	01-Aug-24*	30-Aug-24	Construct Waste Rock Stockpile Pond LP-SP-02A																																					
Sedimentation Ponds - Marathon Pit		120	01-Oct-23	29-Jan-24																																						
CG1101-WM-110	Construct Topsoil Stockpile Pond MA-SP-01AB	30	01-Oct-23*	31-Oct-23	Construct Topsoil Stockpile Pond MA-SP-01AB																																					
CG1101-WM-100	Construct Overburden Stockpile Pond MA-SP-01B	30	31-Oct-23	30-Nov-23	Construct Overburden Stockpile Pond MA-SP-01B																																					

█ Remaining Level of Effort
 █ Remaining Work
 █ Actual Work
 ◆ Milestone
 ◆ Critical Remaining Work

Activity ID	Activity Name	Original Duration	Start	Finish	2022												2023												2024												2025				
					May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb							
CG1101-1740	Place overburden lift under base of Marathon low grade stockpile	27	19-Oct-23	15-Nov-23																									Place overburden lift under base of Marathon low grade stockpile																
Marathon Pit Development					394	17-Jul-23	17-Dec-24																																						
CG1101-1930	Marathon Construction Pit Mining (356/344)	125	17-Jul-23	03-Jan-24													Marathon Construction Pit Mining (356/344)																												
CG1101-1240	Mining 356/344 Bench of Marathon Phase 1 Open pit	64	03-Jan-24	18-Mar-24																									Mining 356/344 Bench of Marathon Phase 1 Open pit																
CG1101-1260	Mining 356/344 Bench of Marathon Phase 1 Open pit	65	18-Sep-24	17-Dec-24																									Mining 356/344 Bench of Marathon Phase 1 Open pit																
Leprechaun Pit Development					487	12-Oct-22 A	18-Sep-24																																						
CG1101-1940	Leprechaun Construction Pit Mining (386/374)	99	12-Oct-22 A	15-Jul-23	Leprechaun Construction Pit Mining (386/374)																																								
CG1101-1400	Mining 374 Bench of Leprechaun Phase 1 Open pit	48	04-Oct-23	26-Nov-23													Mining 374 Bench of Leprechaun Phase 1 Open pit																												
CG1101-1380	Mining 386 Bench of Leprechaun Phase 1 Open pit	32	18-Mar-24	19-Apr-24																									Mining 386 Bench of Leprechaun Phase 1 Open pit																
CG1101-1950	Mining 374 Bench of Leprechaun Phase 1 Open pit	112	19-Apr-24	18-Sep-24																									Mining 374 Bench of Leprechaun Phase 1 Open pit																
1200 - Mine Fixed Equipment					61	28-Sep-23	22-Dec-23																																						
1210 - Explosives Magazine and Mix Plant					61	28-Sep-23	22-Dec-23																																						
Construction					61	28-Sep-23	22-Dec-23																																						
TK1201-CO-1710	Explosives Facility - Mobilization	14	28-Sep-23	13-Oct-23													Explosives Facility - Mobilization																												
TK1201-CO-1720	Construction of Explosives Storage Facility and Mixing Plant	60	14-Oct-23	22-Dec-23													Construction of Explosives Storage Facility and Mixing Plant																												
SG2001-1830	Transformer Installation - Explosives Facility	7	15-Dec-23	22-Dec-23													Transformer Installation - Explosives Facility																												
CB2001 - Civil & Concrete Contract					20	21-Sep-23	13-Oct-23																																						
Construction					20	21-Sep-23	13-Oct-23																																						
CB2001-CO-100	Explosives Facility - Concrete Foundations	20	21-Sep-23	13-Oct-23													Explosives Facility - Concrete Foundations																												
2000 - Process Plant					360	22-Apr-23	23-Sep-24																																						
CB2002-CO-160	Concrete Batch Plant Setup	21	22-Apr-23	12-May-23													Concrete Batch Plant Setup																												
2100 - Primary Crushing					254	02-May-23	06-May-24																																						
2120 - Primary Crushing and COS Feed Conveyor					210	04-Jul-23	06-May-24																																						
SG2001-CO-120	Primary Crushing Area - Concrete Works	70	04-Jul-23	23-Sep-23													Primary Crushing Area - Concrete Works																												
SG2001-CO-3840	Conveyors - Concrete Works	60	09-Aug-23*	18-Oct-23													Conveyors - Concrete Works																												
SG2001-CO-190	Primary Crushing Area - Structural Steel - Modular Crushing Plant Erection	36	19-Oct-23	24-Nov-23													Primary Crushing Area - Structural Steel - Modular Crushing Plant Erection																												
SG2001-CO-220	Primary Crushing Area - Mechanical Installation	90	24-Nov-23	22-Feb-24													Primary Crushing Area - Mechanical Installation																												
SG2001-CO-3850	Primary Crushing Area - COS Feed Conveyor Installation	50	31-Dec-23	19-Feb-24													Primary Crushing Area - COS Feed Conveyor Installation																												
SG2001-CO-260	Primary Crushing Area - Electrical & Instrumentation	77	16-Jan-24	01-Apr-24													Primary Crushing Area - Electrical & Instrumentation																												
SG2001-CO-340	Primary Crushing Area - Mechanical Completion	0		15-Apr-24																									Primary Crushing Area - Mechanical Completion																
SG2001-CO-350	Primary Crushing Area - POV	21	15-Apr-24	06-May-24																									Primary Crushing Area - POV																

■ Remaining Level of Effort
 ▬ Remaining Work
 ◆ Milestone
 ▬ Critical Remaining Work
 ▬ Actual Work

Activity ID	Activity Name	Original Duration	Start	Finish	2022												2023												2024												2025															
					May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb																		
2130 - Coarse Ore Stockpile and Reclaim																																																								
SG2001-CO-3800	Coarse Ore Stockpile & Reclaim Area - Concrete Works	100	02-May-23	09-Aug-23																																																				
SG2001-CO-3810	Coarse Ore Stockpile & Reclaim Area - Stockpile Dome	30	25-Nov-23	24-Dec-23																																																				
SG2001-CO-3820	Coarse Ore Stockpile & Reclaim Area - Structural Steel	40	25-Dec-23	02-Feb-24																																																				
SG2001-CO-200	Coarse Ore Stockpile & Reclaim Area - Mechanical Installation	50	19-Jan-24	08-Mar-24																																																				
SG2001-CO-3830	Coarse Ore Stockpile & Reclaim Area - Electrical & Instrumentation	50	18-Feb-24	07-Apr-24																																																				
2140 - Mill Feed Conveyor																																																								
SG2001-CO-3860	Primary Crushing Area - Mill Feed Conveyor Installation	38	09-Mar-24	15-Apr-24																																																				
2200 - Grinding																																																								
SG2001-CO-130	Grinding Area - Mills Area Foundations & Pedestals - Civil & Concrete Works	128	24-Apr-23	29-Aug-23																																																				
SG2001-CO-230	Grinding Area - Secondary Steel Installation	95	18-Nov-23	20-Feb-24																																																				
SG2001-CO-390	Grinding Area - Mechanical & Piping Installation	200	12-Dec-23	28-Jun-24																																																				
SG2001-CO-395	Grinding Area - Mills Installation	177	10-Jan-24	04-Jul-24																																																				
SG2001-CO-510	Grinding Area - Electrical & Instrumentation Installation	150	06-Apr-24	02-Sep-24																																																				
SG2001-CO-660	Grinding Area - Mechanical Completion	0		02-Sep-24																																																				
SG2001-CO-670	Grinding Area - POV	18	02-Sep-24	23-Sep-24																																																				
2300 - Leaching																																																								
SG2001-CO-160	Leaching Area - Concrete Works	58	31-May-23	07-Aug-23																																																				
SG2001-CO-280	Leaching Area - Tanks Erection	72	04-Nov-23	06-Feb-24																																																				
SG2001-CO-380	Leaching Area - Structural Steel Installation	55	06-Feb-24	10-Apr-24																																																				
SG2001-CO-460	Leaching Area - Mechanical & Piping Installation	80	11-Apr-24	12-Jul-24																																																				
SG2001-CO-500	Leaching Area - Electrical & Instrumentation Installation	35	17-Jun-24	26-Jul-24																																																				
SG2001-CO-600	Leaching Area - Mechanical Completion	0		26-Jul-24																																																				
SG2001-CO-610	Leaching Area - POV	17	27-Jul-24	15-Aug-24																																																				
2400 - Elution and Goldroom																																																								
SG2001-CO-330	Elution and Goldroom Area - Concrete Work	36	19-Jul-23	30-Aug-23																																																				
SG2001-CO-370	Elution and Goldroom Area - Structural Steel	24	22-Jan-24	19-Feb-24																																																				
SG2001-CO-420	Elution and Goldroom Area - ADR Installation	48	19-Feb-24	15-Apr-24																																																				
SG2001-CO-490	Elution and Goldroom Area - Mechanical & Piping Installation	60	15-Apr-24	24-Jun-24																																																				
SG2001-CO-530	Elution and Goldroom Area - Electrical & Instrumentation Installation	32	10-Jun-24	17-Jul-24																																																				
SG2001-CO-580	Elution and Goldroom Area - Mechanical Completion	0		17-Jul-24																																																				

■ Remaining Level of Effort
 ▬ Remaining Work
 ◆ Milestone
■ Actual Work
 ▬ Critical Remaining Work

Activity ID	Activity Name	Original Duration	Start	Finish	2022												2023												2024												2025	
					May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb				
SG2001-CO-590	Elution and Goldroom Area - POV	17	17-Jul-24	06-Aug-24																																						
2500 - Tailings Disposal		288	17-Jun-23	07-Aug-24																																						
SG2001-CO-290	Tailings Area - Concrete Works	55	17-Jun-23	21-Aug-23																																						
SG2001-CO-400	Tailings Area - Tanks Erection	36	06-Feb-24	19-Mar-24																																						
SG2001-CO-430	Tailings Area - Thickener Installation	32	19-Mar-24	25-Apr-24																																						
SG2001-CO-440	Tailings Area - Structural Steel Installation	35	25-Apr-24	05-Jun-24																																						
SG2001-CO-480	Tailings Area - Mechanical & Piping Installation	40	18-May-24	04-Jul-24																																						
SG2001-CO-540	Tailings Area - Electrical & Instrumentation Installation	25	19-Jun-24	18-Jul-24																																						
SG2001-CO-620	Tailings Area - Mechanical Completion	0		18-Jul-24																																						
SG2001-CO-630	Tailings Area - POV	17	18-Jul-24	07-Aug-24																																						
2600 - Reagents		179	19-Aug-23	07-May-24																																						
SG2001-CO-210	Reagents Area - Concrete Works	24	19-Aug-23	16-Sep-23																																						
SG2001-CO-250	Reagents Area - Tanks Erection	35	17-Oct-23	27-Nov-23																																						
SG2001-CO-320	Reagents Area - Mechanical & Piping Installation	100	27-Nov-23	02-Apr-24																																						
SG2001-CO-520	Reagents Area - Electrical & Instrumentation Installation	30	12-Mar-24	16-Apr-24																																						
SG2001-CO-560	Reagents Area - Mechanical Completion	0		16-Apr-24																																						
SG2001-CO-570	Reagents Area - POV	21	17-Apr-24	07-May-24																																						
2700 - Air & Water Services		169	19-Aug-23	23-Apr-24																																						
SG2001-CO-360	Air & Water Services Area - Concrete Works	15	19-Aug-23	06-Sep-23																																						
SG2001-CO-410	Air & Water Services Area - Tanks Erection	24	17-Oct-23	14-Nov-23																																						
SG2001-CO-450	Air & Water Services Area - Structural Steel	12	14-Nov-23	28-Nov-23																																						
SG2001-CO-470	Air & Water Services Area - Mechanical & Piping Installation	75	04-Dec-23	11-Mar-24																																						
SG2001-CO-550	Air & Water Services Area - Electrical & Instrumentation Installation	20	11-Mar-24	03-Apr-24																																						
SG2001-CO-640	Air & Water Services Area - Mechanical Completion	0		03-Apr-24																																						
SG2001-CO-650	Air & Water Services Area - POV	17	03-Apr-24	23-Apr-24																																						
2800 - Process Buildings		222	02-May-23	21-Mar-24																																						
2820 - Mill Building		182	02-May-23	25-Jan-24																																						
SG2001-CO-140	Grinding Area - Building Foundations - Civil & Concrete Works	93	02-May-23	02-Aug-23																																						
SG2001-CO-170	Grinding - Pre-Eng. Building Erection	91	09-Aug-23	07-Nov-23																																						
SG2001-CO-240	Process Buildings - Mechanical Installation	30	07-Nov-23	12-Dec-23																																						
SG2001-CO-270	Process Buildings - Electrical Installation	12	12-Dec-23	05-Jan-24																																						

■ Remaining Level of Effort
 ▬ Remaining Work
 ◆ Milestone
▬ Actual Work
 ▬ Critical Remaining Work

Activity ID	Activity Name	Original Duration	Start	Finish	2022												2023												2024												2025													
					May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb																
SG2001-CO-300	Process Buildings - Mechanical Completion	0		05-Jan-24																									◆ Process Buildings - Mechanical Completion																									
SG2001-CO-310	Process Buildings - POV	17	05-Jan-24	25-Jan-24																									■ Process Buildings - POV																									
2830 - Mine Office					5	17-Oct-23	23-Oct-23																																															
SG2001-CO-3635	Mine Office - Distrib. Transformer Installation	5	17-Oct-23	23-Oct-23																									■ Mine Office - Distrib. Transformer Installation																									
2840 - Mill Office					34	16-Jan-24	24-Feb-24																																															
SG2001-CO-3640	Mill Offices - Modular Bldg. Installation	24	16-Jan-24	13-Feb-24																									■ Mill Offices - Modular Bldg. Installation																									
SG2001-CO-3645	Mill Offices - Fire Protection System Installation	10	13-Feb-24	24-Feb-24																									■ Mill Offices - Fire Protection System Installation																									
2850 - Mill Control Room					24	22-Feb-24	21-Mar-24																																															
SG2001-CO-3670	Pre-Fabricated Control Room Installation	18	22-Feb-24	14-Mar-24																									■ Pre-Fabricated Control Room Installation																									
SG2001-CO-3675	Mill Control Room - Fire Protection Installation	6	14-Mar-24	21-Mar-24																									■ Mill Control Room - Fire Protection Installation																									
2860 - Reagent Mixing Building					98	26-May-23	17-Oct-23													■ ■																																		
3000 - On Site Infrastructure					593	06-Jun-22 A	11-Oct-24																																															
3100 Bulk Earthworks					246	12-Oct-22 A	05-Oct-23																																															
CC3001 - Major Earthworks					246	12-Oct-22 A	05-Oct-23																																															
Water management					60	11-Feb-23	11-Apr-23																																															
CC3001-WM-110	Construct Processing Complex Pond PP-SP-01	60	11-Feb-23	11-Apr-23													■												Construct Processing Complex Pond PP-SP-01																									
Construction					246	12-Oct-22 A	05-Oct-23																																															
CC3001-CO-100	Earthworks - Mobilisation	14	12-Oct-22 A	25-Oct-22 A													■												Earthworks - Mobilisation																									
CC3001-CO-080	Earthworks - Mobile Crusher Setup	6	24-Jul-23	31-Jul-23																									■												Earthworks - Mobile Crusher Setup													
Stripping & Grubbing					240	12-Oct-22 A	27-Sep-23																																															
CC3001-CO-280	Stripping & Grubbing - Accommodation Complex Pad Access Road	2	12-Oct-22 A	13-Oct-22 A													■												Stripping & Grubbing - Accommodation Complex Pad Access Road																									
CC3001-CO-0010	LOE - Stripping & Grubbing - CC3001	256	12-Oct-22 A	18-Jul-23													■												LOE - Stripping & Grubbing - CC3001																									
CC3001-CO-110	Stripping & Grubbing - Accommodation Complex Pad	8	13-Oct-22 A	20-Oct-22 A													■												Stripping & Grubbing - Accommodation Complex Pad																									
CC3001-CO-285	Stripping & Grubbing - Fresh Water Intake Road and Pad	24	21-Oct-22 A	13-Nov-22 A													■												Stripping & Grubbing - Fresh Water Intake Road and Pad																									
CC3001-CO-200	Stripping & Grubbing - Access Road to Process Plant site	38	01-Nov-22 A	08-Dec-22 A													■												Stripping & Grubbing - Access Road to Process Plant site																									
CC3001-CO-120	Stripping, Grubbing & USM removal - Process Plant	47	30-Jan-23*	17-Mar-23													■												Stripping, Grubbing & USM removal - Process Plant																									
CC3001-CO-260	Stripping & Grubbing - Laydown Area	6	27-Feb-23	04-Mar-23													■												Stripping & Grubbing - Laydown Area																									
CC3001-CO-130	Stripping & Grubbing - ROM Pad	10	18-Mar-23	27-Mar-23													■												Stripping & Grubbing - ROM Pad																									
CC3001-CO-140	Stripping & Grubbing - Truck Shop Pad	10	29-Mar-23	07-Apr-23													■												Stripping & Grubbing - Truck Shop Pad																									
CC3001-CO-3997	Stripping & Grubbing - Road from Haul Road to Main Road	5	12-Jul-23	16-Jul-23																									■												Stripping & Grubbing - Road from Haul Road to Main Road													
CC4102-CO-220	Stripping & Grubbing - Road Upgrade - TMF Re-alignment/Diversion Km 78 to 80.5)	4	15-Jul-23	18-Jul-23																									■												Stripping & Grubbing - Road Upgrade - TMF Re-alignment/Diversion Km 78 to 80.5)													

■ Remaining Level of Effort
 ■ Remaining Work
 ◆ Milestone
■ Actual Work
 ■ Critical Remaining Work



VALENTINE PROJECT - LEVEL 2 SCHEDULE Construction Activities

Activity ID	Activity Name	Original Duration	Start	Finish	2022												2023												2024												2025	
					May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb				
CG1101-1480	Stripping & Grubbing - Explosives Storage Road and Pad	8	14-Aug-23*	22-Aug-23													█ Stripping & Grubbing - Explosives Storage Road and Pad																									
CG1101-1850	Topsoil Stripping from Explosives Storage Road and Pad	7	23-Aug-23	30-Aug-23													█ Topsoil Stripping from Explosives Storage Road and Pad																									
CC3001-CO-2995	Stripping & Grubbing - Difusser Alignment Camp Pad + Diffuser line- camp to Victoria Lake	3	23-Sep-23	27-Sep-23													█ Stripping & Grubbing - Difusser Alignment Camp Pad + Diffuser line- camp to Victoria Lake																									
Earthworks		245	13-Oct-22 A	05-Oct-23																																						
CC3001-CO-290	Bulk Earthworks - Cut & Fill & Granular Cap - Accommodation Pad Access Road	1	13-Oct-22 A	13-Oct-22 A													█ Bulk Earthworks - Cut & Fill & Granular Cap - Accommodation Pad Access Road																									
CC3001-CO-1020	LOE - Bulk Earthworks - CC3001	273	13-Oct-22 A	05-Oct-23													█ LOE - Bulk Earthworks - CC3001																									
CC3001-CO-4027	Bulk Earthworks - Excavation - Accommodation Complex Pad (Removal of USM)	32	17-Oct-22 A	17-Nov-22 A													█ Bulk Earthworks - Excavation - Accommodation Complex Pad (Removal of USM)																									
CC3001-CO-415	Bulk Earthworks - Cut & Fill & Wearing Course - Fresh Water Intake Road and Pad	16	29-Oct-22 A	13-Nov-22 A													█ Bulk Earthworks - Cut & Fill & Wearing Course - Fresh Water Intake Road and Pad																									
CC3001-CO-150	Bulk Earthworks - Cut & Fill - Accommodation Complex Pad (PHASE 1 - Q2 & Q4)	12	18-Nov-22 A	29-Nov-22 A													█ Bulk Earthworks - Cut & Fill - Accommodation Complex Pad (PHASE 1 - Q2 & Q4)																									
CC3001-CO-4017	Bulk Earthworks - Cut & Fill - Accommodation Complex Pad (PHASE 2 - Q3)	10	30-Nov-22 A	09-Dec-22 A													█ Bulk Earthworks - Cut & Fill - Accommodation Complex Pad (PHASE 2 - Q3)																									
CC3001-CO-210	Bulk Earthworks - Cut & Fill & Granular - Road from Access Road to Plant site	108	09-Dec-22 A	07-Apr-23													█ Bulk Earthworks - Cut & Fill & Granular - Road from Access Road to Plant site																									
CC3001-CO-4037	Bulk Earthworks - Cut & Fill - Accommodation Complex Pad (PHASE 3 - Q1)	16	09-Dec-22 A	25-Dec-22 A													█ Bulk Earthworks - Cut & Fill - Accommodation Complex Pad (PHASE 3 - Q1)																									
CC3001-CO-310	Construction Drainage - Accommodation Complex Pad Area	5	10-Dec-22 A	14-Dec-22 A													█ Construction Drainage - Accommodation Complex Pad Area																									
CC3001-CO-4047	Bulk Earthworks - Climate Monitoring Station Area	1	11-Jan-23 A	28-Jan-23													█ Bulk Earthworks - Climate Monitoring Station Area																									
CC3001-CO-160	Bulk Earthworks - Process Plant	30	27-Feb-23	28-Mar-23													█ Bulk Earthworks - Process Plant																									
CC3001-CO-510	Construction Drainage - Process Plant Area	12	27-Feb-23	13-Mar-23													█ Construction Drainage - Process Plant Area																									
CC3001-CO-270	Bulk Earthworks - Laydown Area	6	23-Mar-23	28-Mar-23													█ Bulk Earthworks - Laydown Area																									
CC3001-CO-170	Bulk Earthworks - ROM Pad (Phase 1) & MSE Wall	81	29-Mar-23	17-Jun-23													█ Bulk Earthworks - ROM Pad (Phase 1) & MSE Wall																									
CC3001-CO-180	Bulk Earthworks - Truck Shop Pad (Phase 1)	84	08-Apr-23	30-Jun-23													█ Bulk Earthworks - Truck Shop Pad (Phase 1)																									
CC3001-CO-345	Bulk Earthworks - ROM Pad (Phase 2)	67	18-Jun-23	23-Aug-23													█ Bulk Earthworks - ROM Pad (Phase 2)																									
CC3001-CO-500	Bulk Earthworks - Main Gate Pad	7	30-Jun-23	08-Jul-23													█ Bulk Earthworks - Main Gate Pad																									
CC3001-CO-4007	Bulk Earthworks - Road from Haul Road to Main Road	10	17-Jul-23	26-Jul-23													█ Bulk Earthworks - Road from Haul Road to Main Road																									
CC3001-CO-230	Bulk Earthworks - Road - TMF Re-alignment/Diversion Km 78 to 80.5 + 9 culverts)	24	01-Aug-23	24-Aug-23													█ Bulk Earthworks - Road - TMF Re-alignment/Diversion Km 78 to 80.5 + 9 culverts)																									
CC3001-CO-4057	Bulk Earthworks - Truck Shop Pad (Phase 2)	61	01-Aug-23	30-Sep-23													█ Bulk Earthworks - Truck Shop Pad (Phase 2)																									
CG1101-1800	Earthworks - Explosives Access Road	12	31-Aug-23	13-Sep-23													█ Earthworks - Explosives Access Road																									
CG1101-1680	Earthworks - Cut/Fill Explosives Bulk Storage and Magazine Pad Areas	6	14-Sep-23	20-Sep-23													█ Earthworks - Cut/Fill Explosives Bulk Storage and Magazine Pad Areas																									
CC3001-CO-425	Bulk Earthworks - Cut & Fill & Granular - Diffuser Alignment Accommodation Pad + Diffuser line camp to Victoria Lake	8	28-Sep-23	05-Oct-23													█ Bulk Earthworks - Cut & Fill & Granular - Diffuser Alignment Accommodation Pad + Diffuser																									
CC3001-CO-300	Bulk Earthworks Complete - Process Plant Area	0		05-Oct-23													◆ Bulk Earthworks Complete - Process Plant Area																									
3200 - HV Power Switchyard and Power Distribution - by SG2001		305	21-May-23	05-Aug-24																																						
CG3201 - HV Substation Installation (C-0011)		70	21-May-23	30-Aug-23																																						
Construction		70	21-May-23	30-Aug-23																																						

Remaining Level of Effort
 Remaining Work
 Milestone
 Actual Work
 Critical Remaining Work

Activity ID	Activity Name	Original Duration	Start	Finish	2022												2023												2024												2025	
					May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb				
CG3201-CO-110	HV Substation Installation - Foundations - Concrete Works	30	21-May-23	19-Jun-23																																						
CG3201-CO-100	HV Substation Installation - Mobilisation	15	01-Jun-23	19-Jun-23																																						
CG3201-CO-120	HV Substation Installation - Electrical Installation	62	19-Jun-23	30-Aug-23																																						
3220 - Site Power Distribution		194	19-Jun-23	29-Mar-24																																						
Construction		194	19-Jun-23	29-Mar-24																																						
SG2001-CO-1220	Site Power Distribution - Concrete Work	40	19-Jun-23	04-Aug-23																																						
SG2001-CO-1230	Site Power Distribution - Structural Steel Installation	30	04-Aug-23	08-Sep-23																																						
SG2001-CO-1260	Site Power Distribution - Electrical Installation	120	31-Oct-23	29-Mar-24																																						
SG2001-CO-3760	Site Power Distribution - Main E-Room Installation	30	01-Nov-23	30-Nov-23																																						
3230 - Emergency Power Generation		28	10-Jun-24	12-Jul-24																																						
SG2001-CO-1240	Emergency Power Generator - Electrical Installation	28	10-Jun-24	12-Jul-24																																						
3240 - Control System		60	27-May-24	05-Aug-24																																						
SG2001-CO-1250	Control System - Installation	60	27-May-24	05-Aug-24																																						
3300 - Communications - Internet & Cell Services		149	07-Dec-22 A	15-Jul-23																																						
TK3301 - Microwave Communications		50	23-Mar-23	03-Jun-23																																						
Construction Delayed (Awaiting IAAC review and response) *		50	23-Mar-23	03-Jun-23																																						
TK3301-CO-100	Communication Tower - Contractor Mobilization - (DELAYED due to permitting)	10	23-Mar-23	03-Apr-23																																						
TK3301-CO-110	Communication Tower - Civil Works - Foundations	16	04-Apr-23	21-Apr-23																																						
TK3301-CO-170	Communication Tower - Erection & Installation works	30	24-Apr-23	29-May-23																																						
TK3301-CO-180	Communication Services - Commissioned	5	29-May-23	03-Jun-23																																						
TK3302 - VHF Radio Communication		149	07-Dec-22 A	15-Jul-23																																						
Construction		149	07-Dec-22 A	15-Jul-23																																						
TK3302-CO-100	Radio Communications - Temporary Trailer Setup	3	07-Dec-22 A	09-Dec-22 A																																						
TK3302-CO-105	Radio Communications - Temporary Trailer - Testing Period	49	10-Dec-22 A	15-Feb-23																																						
TK3302-CO-110	Radio Communications - Temporary Communication System Available	148	17-Feb-23	15-Jul-23																																						
TK3302-CO-120	Radio Communications - Equipment Installation	41	29-May-23	15-Jul-23																																						
TK3302-CO-130	Radio Communications - Equipment Commissioned	0		15-Jul-23																																						
3400 - Fuel Storage		90	14-Jul-23	27-Oct-23																																						
SG2001-CO-3400	Fuel Storage and Distribution - Concrete Works	20	14-Jul-23	07-Aug-23																																						
SG2001-CO-3405	Fuel Storage and Distribution - Permanent Fuel Supply Station Construction	70	07-Aug-23*	27-Oct-23																																						
SG2001-CO-3410	Fuel Storage and Distribution - Dist Transformer - Electrical Installation	6	20-Oct-23	27-Oct-23																																						

* **NOTE** Marathon has received provincial approval to proceed with the communication tower construction, and is awaiting review by IAAC. The schedule for the tower construction will be revisited/revised based on receipt of feedback/response from IAAC.

- Communication Tower - Contractor Mobilization - (DELAYED due to permitting)
- Communication Tower - Civil Works - Foundations
- Communication Tower - Erection & Installation works
- Communication Services - Commissioned

- Radio Communications - Temporary Trailer Setup
- Radio Communications - Temporary Trailer - Testing Period
- Radio Communications - Temporary Communication System Available
- Radio Communications - Equipment Installation
- Radio Communications - Equipment Commissioned
- Fuel Storage and Distribution - Concrete Works
- Fuel Storage and Distribution - Permanent Fuel Supply Station Construction
- Fuel Storage and Distribution - Dist Transformer - Electrical Installation

Remaining Level of Effort
 Remaining Work
 Milestone
 Actual Work
 Critical Remaining Work

Activity ID	Activity Name	Original Duration	Start	Finish	2022												2023												2024												2025	
					May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb				
3500 - Sewage																																										
SG2001-CO-3500	Mill Area - Sewage Treatment Plant (Containerized) - Installation	20	01-Dec-23	04-Jan-24																																						
SG2001-CO-3510	Mill Area - Sewage Treatment Plant (Containerized) - Pipework	10	04-Jan-24	16-Jan-24																																						
3600 - Buildings																																										
Construction																																										
3610 - Main Admin Office																																										
TK3607-CO-100	Main Admin - Bases / Foundations for Modular Buildings	30	01-Dec-23	16-Jan-24																																						
SG2001-CO-3610	Main Admin - Modular Building Installation	32	16-Jan-24	22-Feb-24																																						
SG2001-CO-3620	Main Admin office - Distrib. Transformer Installation	6	22-Feb-24	29-Feb-24																																						
SG2001-CO-3630	Main Admin office - Fire Protection System Installation	6	29-Feb-24	07-Mar-24																																						
3620 - Gatehouse & Access Control																																										
SG2001-CO-3615	Security Modular Bldgs. Installation	14	16-Jan-24	02-Feb-24																																						
SG2001-CO-3625	Gatehouse & Access Control - Electrical installation	6	02-Feb-24	09-Feb-24																																						
3650 - Mill Maintenance & Warehouse Facility																																										
SG2001-CO-3650	Mill Maintenance Workshop/Store - Concrete Works	24	09-Aug-23	06-Sep-23																																						
SG2001-CO-3880	Mill Maintenance Workshop/Store - Fabric Buiding Installation	40	24-Nov-23	20-Jan-24																																						
SG2001-CO-3655	Mill Maintenance Workshop/Store - Fire Protection Installation	12	06-Jan-24	20-Jan-24																																						
3660 - Mine Maintenance Facility																																										
CB2001-CO-3660	Mine Maintenance Workshop/Store - Concrete Works	14	06-Sep-23	22-Sep-23																																						
SG2001-CO-3870	Mine Maintenance Workshop/Store - Fabric Building Installation	38	25-Nov-23	01-Jan-24																																						
SG2001-CO-3665	Mill Maintenance Workshop/Store - Electrical Installation	6	26-Dec-23	01-Jan-24																																						
3663 - Truck shop - Washbay																																										
CB2001-CO-3690	Truck Wash - Concrete Works	50	30-Jun-23	28-Aug-23																																						
CA3601-CO-3691	Truck Wash - Bldg Installation	18	12-Sep-23	03-Oct-23																																						
CA3601-CO-3692	Truck Wash - Structural Steel Installation	14	03-Oct-23	20-Oct-23																																						
CA3601-CO-3693	Truck Wash - Mechanical Equipment Installation	28	20-Oct-23	22-Nov-23																																						
CA3601-CO-3694	Truck Wash - Electrical Installation	18	13-Nov-23	04-Dec-23																																						
CA3601-CO-3695	Truck Wash - Fire Protection Installation	18	20-Nov-23	11-Dec-23																																						
CA3601-CO-3695	Truck Wash - Fire Protection Installation	18	20-Nov-23	11-Dec-23																																						
3665 - Mine Dry																																										
TK3607-CO-110	Mine Dry - Bases Preparation / Foundations for Modules	20	13-Dec-23	16-Jan-24																																						
TK3607-CO-120	Mine Dry - Modules installation	40	16-Jan-24	02-Mar-24																																						

■ Remaining Level of Effort
 ■ Remaining Work
 ■ Actual Work
 ■ Critical Remaining Work
 ◆ Milestone

Activity ID	Activity Name	Original Duration	Start	Finish	2022												2023												2024												2025	
					May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb				
3670 - Reagent Storage Building																																										
TK3606-CO-100	Reagent Storage Building - Foundation works	30	20-Oct-23	24-Nov-23																									█ Reagent Storage Building - Foundation works													
TK3606-CO-110	Reagent Storage Building Installation	45	24-Nov-23	26-Jan-24																									█ Reagent Storage Building Installation													
3680 - Laboratory																																										
TK3603-CO-100	Met / Assay Lab - Bases Preparation / Foundations for Modules	19	02-Oct-23	24-Oct-23																									█ Met / Assay Lab - Bases Preparation / Foundations for Modules													
TK3603-CO-110	Met / Assay Lab - Modules assembly and Equipment installation	51	24-Oct-23	22-Dec-23																									█ Met / Assay Lab - Modules assembly and Equipment installation													
TK3603-CO-120	Met / Assay Lab - Electrical Installation	20	14-Dec-23	16-Jan-24																									█ Met / Assay Lab - Electrical Installation													
TK3603-CO-130	Met / Assay Lab - Fire Protection Installation	12	03-Jan-24	16-Jan-24																									█ Met / Assay Lab - Fire Protection Installation													
TK3603-CO-140	Met / Assay Lab - Commissioning	6	17-Jan-24	23-Jan-24																									█ Met / Assay Lab - Commissioning													
3700 - Water Supply																																										
CC3001 - Fresh Water Pumping Station Installation																																										
Construction																																										
CC3001-CO-3750	Water Supply - Fresh Water Piping Installation - Victoria Lake to Camp	104	05-Nov-22 A	02-Mar-23													█ Water Supply - Fresh Water Piping Installation - Victoria Lake to Camp																									
CC3001-CO-3700	Water Supply - Fresh Water Pump Intake Installation	102	24-Nov-22 A	07-Mar-23													█ Water Supply - Fresh Water Pump Intake Installation																									
CC3001-CO-3710	Water Supply - Pumps, Control Panel & VFD - Electrical Installation	12	24-Feb-23	07-Mar-23																									█ Water Supply - Pumps, Control Panel & VFD - Electrical Installation													
CG2002 - SMP Contract																																										
Construction																																										
CC3001-CO-3730	Water Supply - Fresh Water Piping - Camp to Process Plant - Installation	25	04-Mar-24*	28-Mar-24																									█ Water Supply - Fresh Water Piping - Camp to Process Plant - Installation													
CC3001-CO-3720	Water Supply - Distribution Transformer Installation	6	29-Mar-24	03-Apr-24																									█ Water Supply - Distribution Transformer Installation													
CC3001-CO-3740	Water Supply - Reclaim Water - Piping Installation	38	29-Mar-24	05-May-24																									█ Water Supply - Reclaim Water - Piping Installation													
3800 - Tailings Storage Facility																																										
Construction - TMF Stage 1 and 2																																										
CC3001 - Major Earthworks (TMF Construction)																																										
CC3001-CO-3887	LOE - TMF Dam Construction (resources)	549	12-Apr-23	11-Oct-24																									█ LOE - TMF Dam Construction (resources)													
TMF - Stage 1																																										
CC3001-CO-105	TMF Access Roads	61	12-Apr-23	11-Jun-23																									█ TMF Access Roads													
CC3001-CO-115	TMF Dam Stripping & Grubbing	30	12-Apr-23	11-May-23																									█ TMF Dam Stripping & Grubbing													
CC3001-CO-117	TMF Dam Construction	245	11-May-23	11-Jan-24																									█ TMF Dam Construction													
CC3001-CO-135	TMF Upstream Foundation Tie-in	60	12-Sep-23	11-Nov-23																									█ TMF Upstream Foundation Tie-in													
CC3001-CO-125	TMF Dam Construction (Warm Weather)	91	12-Apr-24	11-Jul-24																									█ TMF Dam Construction (Warm Weather)													
CC3001-CO-145	Permanent TMF Runoff and Seepage Collection System	91	12-Apr-24	11-Jul-24																									█ Permanent TMF Runoff and Seepage Collection System													

█ Remaining Level of Effort
 █ Remaining Work
 ◆ Milestone
█ Actual Work
 █ Critical Remaining Work

Activity ID	Activity Name	Original Duration	Start	Finish	2022												2023												2024												2025	
					May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb				
TMF - Stage 2																																										
CC3001-CO-3937	TMF Upstream Foundation Tie-in	30	12-Nov-23	11-Dec-23																									■ TMF Upstream Foundation Tie-in													
CC3001-CO-3927	TMF Dam Construction (Clearing, Stripping and Bulk Fill)	274	12-Jan-24	11-Oct-24																									■ TMF Dam Construction													
CC3001-CO-3907	TMF Dam Construction (Warm Weather)	92	12-Jul-24	11-Oct-24																									■ TMF Dam Construction													
3840 - Tailings Decant Barge Pumps - (to be updated)																																										
A1800	Tailings Decant Pumps & Barge Installation	15	07-Jun-24	25-Jun-24																									■ Tailings Decant Pumps & Barge Installation													
3850- Tailings Slurry Pipeline - (to be updated)																																										
A1810	Tailings Slurry Pipeline - Installation	32	08-Apr-24	15-May-24																									■ Tailings Slurry Pipeline - Installation													
A1820	Tailing Slurry Pipeline - Ditching & Liner Installation	12	08-Apr-24	22-Apr-24																									■ Tailing Slurry Pipeline - Ditching & Liner Installation													
3860 - Effluent Treatment Plant - (to be updated)																																										
A1840	Effluent Treatment Plant - Installation	25	07-Jun-24	06-Jul-24																									■ Effluent Treatment Plant - Installation													
A1830	Effluent Treatment Plant - Distrib. Transformer Installation	5	01-Jul-24	06-Jul-24																									■ Effluent Treatment Plant - Distrib. Transf													
3900 - Accommodation Complex																																										
TK3904 - Accommodation Complex Utilities - Black & McDonald																																										
Construction																																										
TK3904-CO-235	Accommodation Complex - Utilities & U/G services - Install Plumbing, Water& FW in AC	32	14-Feb-23	17-Mar-23																									■ Accommodation Complex - Utilities & U/G services - Install Plumbing, Water& FW in AC													
TK3902-CO-190	Accommodation Complex - Utilities & U/G services - Water Systems installation	14	21-Feb-23	06-Mar-23																									■ Accommodation Complex - Utilities & U/G services - Water Systems installation													
TK3904-CO-190	Accommodation Complex - Utilities & U/G services - Electrical Systems (Cables Trays, cabling in AC)	26	21-Feb-23	18-Mar-23																									■ Accommodation Complex - Utilities & U/G services - Electrical Systems (Cables Trays, cabling in AC)													
TK3904-CO-195	Accommodation Complex - Utilities & U/G services - Genset Install & Commissioning	25	22-Feb-23	18-Mar-23																									■ Accommodation Complex - Utilities & U/G services - Genset Install & Commissioning													
TK3904-CO-205	Accommodation Complex - Utilities & U/G services - Commissioning Water Systems	15	08-Mar-23	22-Mar-23																									■ Accommodation Complex - Utilities & U/G services - Commissioning Water Systems													
TK3904-CO-225	Accommodation Complex - Final review and Occupation permit issuance	20	18-Mar-23	11-Apr-23																									■ Accommodation Complex - Final review and Occupation permit issuance													
TK3904-CO-215	Accommodation Complex - Final Tie-in modules & Commissioning of all systems	8	01-Apr-23	11-Apr-23																									■ Accommodation Complex - Final Tie-in modules & Commissioning of all systems													
TK3904-CO-200	Accommodation Complex - First Rooms available (44 x 8 = 352)	0		11-Apr-23																									◆ Accommodation Complex - First Rooms available (44 x 8 = 352)													
TK3904-CO-245	Accommodation Complex - Touch-ups to Core Building	4	12-Apr-23	17-Apr-23																									■ Accommodation Complex - Touch-ups to Core Building													
TK3902 - Accommodation Complex - Black & McDonald																																										
Construction																																										
TK3902-CO-120	Accommodation Complex - Mobilization - Black & McDonald	3	23-Jan-23 A	25-Jan-23 A																									■ Accommodation Complex - Mobilization - Black & McDonald													
TK3902-CO-250	Accommodation Complex - Core Building (Recreation/Kitchen Modules) Installation	80	26-Jan-23 A	11-Apr-23																									■ Accommodation Complex - Core Building (Recreation/Kitchen Modules) Installation													
TK3902-CO-270	Accommodation Complex - Artic Corridor Installation	19	02-Feb-23	20-Feb-23																									■ Accommodation Complex - Artic Corridor Installation													
TK3902-CO-180	Accommodation Complex - Fire Protection Installation	12	28-Mar-23	11-Apr-23																									■ Accommodation Complex - Fire Protection Installation													
TK3902-CO-100	Accommodation Complex - Distrib. Transformer and Electrical Installation	6	04-Apr-23	11-Apr-23																									■ Accommodation Complex - Distrib. Transformer and Electrical Installation													

■ Remaining Level of Effort
 ■ Remaining Work
 ◆ Milestone
■ Actual Work
 ■ Critical Remaining Work

VALENTINE PROJECT - LEVEL 2 SCHEDULE Construction Activities

Activity ID	Activity Name	Original Duration	Start	Finish	2022												2023												2024												2025	
					May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb				
TK3902-CO-260	Accommodation Complex - Bedroom Modules Installation (73 Beds)	54	18-Apr-23	10-Jun-23													Accommodation Complex - Bedroom Modules Installation (73 Beds)																									
TK3901 - Accommodation Complex - Morris Group		205	06-Jun-22 A	02-Apr-23																																						
Construction		205	06-Jun-22 A	02-Apr-23																																						
TK3901-CO-250	Accommodation Complex - Refurbishment of modules	92	06-Jun-22 A	23-Sep-22 A													Accommodation Complex - Refurbishment of modules																									
TK3901-CO-145	Accommodation Complex - Materials & Modules Transportation to site - Morris Group	39	17-Dec-22 A	10-Feb-23													Accommodation Complex - Materials & Modules Transportation to site - Morris Group																									
TK3901-CO-150	Accommodation Complex - Mobilization - Morris Group	6	09-Jan-23 A	14-Jan-23 A													Accommodation Complex - Mobilization - Morris Group																									
TK3901-CO-160	Accommodation Complex - Site Preparation - Building Cribs	12	11-Jan-23 A	22-Jan-23 A													Accommodation Complex - Site Preparation - Building Cribs																									
TK3901-CO-270	Accommodation Complex - Dorm Modules (08 modules) Installation	47	27-Jan-23 A	14-Mar-23													Accommodation Complex - Dorm Modules (08 modules) Installation																									
TK3901-CO-260	Accommodation Complex - Mechanical & Electrical Commissioning	11	23-Mar-23	02-Apr-23													Accommodation Complex - Mechanical & Electrical Commissioning																									
TK3905 - Temp. Construction Camp & Facilities - Black & McDonald		50	25-Jul-22 A	04-Oct-22 A																																						
Construction		50	25-Jul-22 A	04-Oct-22 A																																						
TK3905-CO-110	Temporary Construction Camp - Mobilization	1	25-Jul-22 A	25-Jul-22 A													Temporary Construction Camp - Mobilization																									
TK3905-CO-100	Temporary Construction Camp (120 beds) - Installation & Commissioning	71	26-Jul-22 A	04-Oct-22 A													Temporary Construction Camp (120 beds) - Installation & Commissioning																									
4000 - Off Site Infrastructure		582	07-Aug-21 A	06-Dec-23																																						
4100 - Main Access Road		582	07-Aug-21 A	06-Dec-23																																						
CC4101 - Access Roads - Temporary Roads and Maintenance Works		164	07-Aug-21 A	28-Feb-22 A																																						
Construction		164	07-Aug-21 A	28-Feb-22 A																																						
CC4101-CO-100	Access Road - Maintenance Works - Mobilisation	7	07-Aug-21 A	16-Aug-21 A													Access Road - Maintenance Works - Mobilisation																									
CC4101-CO-110	Access Road Maintenance Works	157	16-Aug-21 A	28-Feb-22 A													Access Road Maintenance Works																									
CC4102 - Access Roads - Upgrades		245	05-Oct-22 A	28-Sep-23																																						
Construction		245	05-Oct-22 A	28-Sep-23																																						
CC4102-CO100	Access Road - Upgrade Works - Mobilisation	2	05-Oct-22 A	06-Oct-22 A													Access Road - Upgrade Works - Mobilisation																									
CC4102-CO010	LOE - Access Road - Upgrade Works 2022	117	05-Oct-22 A	09-Jun-23													LOE - Access Road - Upgrade Works 2022																									
CC4102-CO-100	Earthworks - Access Road Upg - Km 48 (Re-alignment)	15	06-Oct-22 A	20-Oct-22 A													Earthworks - Access Road Upg - Km 48 (Re-alignment)																									
CC4102-CO-120	Earthworks - Access Road Upg - Km 60 (Re-alignment + 4 culverts)	72	14-Oct-22 A	26-Nov-22 A													Earthworks - Access Road Upg - Km 60 (Re-alignment + 4 culverts)																									
CC4102-CO-125	Earthworks - Access Road Upg - Km 78.9 to Km 81.2 + 8 culverts)	36	05-May-23	09-Jun-23													Earthworks - Access Road Upg - Km 78.9 to Km 81.2 + 8 culverts)																									
CC4102-CO-110	Earthworks - Access Road Upg - Km 55.5 (Re-alignment)	10	09-Jun-23	21-Jun-23													Earthworks - Access Road Upg - Km 55.5 (Re-alignment)																									
CC4102-CO-130	Earthworks - Access Road Upg - Km 65.7 (Re-alignment)	10	21-Jun-23	03-Jul-23													Earthworks - Access Road Upg - Km 65.7 (Re-alignment)																									
CC4102-CO-140	Earthworks - Access Road Upg - Km 66.7 (Re-alignment + 5 culverts)	17	03-Jul-23	22-Jul-23													Earthworks - Access Road Upg - Km 66.7 (Re-alignment + 5 culverts)																									
CC4102-CO-150	Earthworks - Access Road Upg - Km 73 (Re-alignment + 3 culverts)	15	22-Jul-23	09-Aug-23													Earthworks - Access Road Upg - Km 73 (Re-alignment + 3 culverts)																									
CC4102-CO-235	Earthworks - Access Road Upg - Km 80 to 82 + 5 culverts	17	09-Aug-23	29-Aug-23													Earthworks - Access Road Upg - Km 80 to 82 + 5 culverts																									

■ Remaining Level of Effort
 ▬ Remaining Work
 ◆ Milestone
 ▬ Critical Remaining Work
 ▬ Actual Work

