

**KINROSS**

**Great Bear**

# **Great Bear Gold Project Impact Statement**

## **Appendix B:**

### **Impact Statement Commitments**



## **Appendix B: Summary of Impact Statement Commitments**

This appendix contains a summary of commitments in the Impact Statement. There are many more design features and management approaches described in the Impact Statement particularly in the text related to proposed mitigation measures, which together provide the framework for environmental stewardship for the Great Bear Project (Project).

The commitments are presented in three tables prepared jointly by WSP Canada Inc. and SLR Consulting (Canada) Ltd. on behalf of Great Bear Resources Ltd. (Great Bear Resources):

- Table B-1: Summary of Commitments - Pathway Valued Components (pVCs)
- Table B-2: Summary of Commitments – Federal Valued Components (fVCs)
- Table B-3: Other Impact Statement Commitments.

**Table B-1: Summary of Commitments - Pathway Valued Components (pVCs)**

Item	pVC (Key Section)	Commitment	Project Phase
1	All	<ul style="list-style-type: none"> <li>Monitoring programs will be implemented to verify the accuracy of the predicted effects and assess the effectiveness of the implemented mitigation measures</li> </ul>	All
2	Air Quality (7.2)	<ul style="list-style-type: none"> <li>Dust emissions will be controlled through the application of water spray and if appropriate, use of provincially-approved chemical suppressants particularly on roads</li> </ul>	All
3	Air Quality (7.2)	<ul style="list-style-type: none"> <li>Vehicle speeds will be limited on roads and roads will be maintained in good condition with regular inspections and timely maintenance</li> </ul>	All
4	Air Quality (7.2)	<ul style="list-style-type: none"> <li>A dust management plan will be prepared prior to the construction phase that will be modified for the operations phase and closure phase as appropriate</li> </ul>	All
5	Air Quality (7.2)	<ul style="list-style-type: none"> <li>Travel surfaces will be maintained to minimize silt (fine material)</li> </ul>	All
6	Air Quality (7.2)	<ul style="list-style-type: none"> <li>Process plant emission sources will be designed and managed to allow for atmospheric dispersion</li> </ul>	O
7	Air Quality (7.2)	<ul style="list-style-type: none"> <li>Dust control equipment such as enclosures, dust collectors, baghouses or water sprays will be utilized as needed to minimize dust</li> </ul>	O
8	Air Quality (7.2)	<ul style="list-style-type: none"> <li>Air emissions from diesel consumption associated will be controlled through strategic mine scheduling to minimize the total distance travelled by haul trucks</li> </ul>	O
9	Air Quality (7.2)	<ul style="list-style-type: none"> <li>Exposed dust sources will be vegetated during closure to better control dust emissions from exposed areas</li> </ul>	CI
10	Sound (7.3)	<ul style="list-style-type: none"> <li>Reversing alarms will be in accordance with the applicable health and safety regulations, but alternative approaches such as use of should strobe lights will be considered</li> </ul>	All
11	Sound (7.3)	<ul style="list-style-type: none"> <li>Regular inspections will take place to confirm that equipment and machinery used on site is operated in good working condition through regular maintenance</li> </ul>	All
12	Sound (7.3)	<ul style="list-style-type: none"> <li>Best practices will be followed for use of engine brakes, and engine idling (but in consideration of seasons and weather)</li> </ul>	All
13	Sound (7.3)	<ul style="list-style-type: none"> <li>A noise management plan will be prepared to minimize sound impact to the surrounding area</li> </ul>	All
14	Sound (7.3)	<ul style="list-style-type: none"> <li>A mechanism will be established for receiving and responding to noise complaints in a timely manner during construction, operations and closure phases</li> </ul>	All
15	Sound (7.3)	<ul style="list-style-type: none"> <li>Site equipment will be operated to meet NPC-300 noise limits at points of reception, as applicable, with motorized equipment selected or designed as appropriate with mufflers / silencers to reduce noise emissions</li> </ul>	C, O
16	Vibration (7.4)	<ul style="list-style-type: none"> <li>A Blast Management Plan will be implemented prior to the start of construction</li> </ul>	All
17	Vibration (7.4)	<ul style="list-style-type: none"> <li>Simultaneous blasting operations at various locations within the Project site and primarily the underground mine, LP Central pit and Viggo pit will be avoided</li> </ul>	C, O
18	Vibration (7.4)	<ul style="list-style-type: none"> <li>A series of test blasts will be performed before any blasting activity occurs near fish habitat to determine the site-specific parameters governing the propagation of ground vibration and water overpressure to impacted fish habitats, to update predictions and adjust mitigation measures</li> </ul>	C, O
19	Groundwater (7.5)	<ul style="list-style-type: none"> <li>Collected contact water will be used in ore processing to minimize requirements for fresh water</li> </ul>	All
20	Groundwater (7.5)	<ul style="list-style-type: none"> <li>Ponds collecting water requiring treatment for parameters other than suspended solids will be designed for low permeability or located in areas where downgradient seepage is captured or contained</li> </ul>	C, O
21	Groundwater (7.5)	<ul style="list-style-type: none"> <li>The LP Central pit, VMF and underground workings will be actively filled with redirected site runoff and fresh water from the Chukuni River</li> </ul>	CI
22	Surface Water Flows and Levels (7.6)	<ul style="list-style-type: none"> <li>Project Area (PA) will be restored to a naturalized state at closure, returning surface water runoff conditions closer to those present pre-development</li> </ul>	CI
23	Water Quality (7.7)	<ul style="list-style-type: none"> <li>A site-specific erosion and sediment control plan will be implemented to mitigate the entry of sediment into surrounding waterbodies</li> </ul>	All
24	Water Quality (7.7)	<ul style="list-style-type: none"> <li>A dust management plan will identify sources of dust, outline control measures and specify inspection and record-keeping to support effective management and to minimize the potential for fugitive dust deposition on the surface water receiving environment</li> </ul>	All
25	Water Quality (7.7)	<ul style="list-style-type: none"> <li>Ponds collecting water requiring treatment for parameters other than suspended solids will be lined or located in areas where downgradient groundwater seepage is captured or contained to minimize fugitive seepage to the environment</li> </ul>	C, O
26	Water Quality (7.7)	<ul style="list-style-type: none"> <li>The cyanide destruction circuit in the process plant will be compliant with the International Cyanide Management Code</li> </ul>	O
27	Vegetation Communities (7.8)	<ul style="list-style-type: none"> <li>Invasive species management plans will be in place during all Project stages</li> </ul>	All

Item	pVC (Key Section)	Commitment	Project Phase
28	Vegetation Communities (7.8)	<ul style="list-style-type: none"> <li>A spill prevention and response plan will be developed and implemented to prevent contamination in the event of an accidental spill / leak</li> </ul>	All
29	Vegetation Communities (7.8)	<ul style="list-style-type: none"> <li>Fuels and hazardous substances will be stored in location(s) greater than 30 m away from the wetland or watercourse</li> </ul>	All
30	Vegetation Communities (7.8)	<ul style="list-style-type: none"> <li>Great Bear Resources will progressively rehabilitate the PA to reduce erosion, improve stability, and achieve end land use objectives established through ongoing consultation with local Indigenous Nations</li> </ul>	All
31	Vegetation Communities (7.8)	<ul style="list-style-type: none"> <li>Applicable standard erosion and sediment control measures will be implemented</li> </ul>	All
32	Vegetation Communities (7.8)	<ul style="list-style-type: none"> <li>Mechanical vegetation removal practices will be used when possible</li> </ul>	C
33	Vegetation Communities (7.8)	<ul style="list-style-type: none"> <li>Contractors will be required to provide equipment clean and free of any plant or soil material</li> </ul>	C, O
34	Vegetation Communities (7.8)	<ul style="list-style-type: none"> <li>Organic material stripped in or near areas with identified invasive and non-native species will be managed and stored in designated locations, where practical</li> </ul>	C, O
35	Vegetation Communities (7.8)	<ul style="list-style-type: none"> <li>Areas within the PA will be revegetated through revegetation with commercially available native plant species and by preparing the ground surface to promote natural revegetation</li> </ul>	CI
36	Vegetation Communities (7.8)	<ul style="list-style-type: none"> <li>Opportunities will be provided for Indigenous communities to review and support refinement of the list of plant species during revegetation planning and to participate in revegetation trials</li> </ul>	CI
37	Wild Rice (7.9)	<ul style="list-style-type: none"> <li>Great Bear Resources will develop potential Wild Rice enhancement options for implementation</li> </ul>	All
38	Wild Rice (7.9)	<ul style="list-style-type: none"> <li>Water level monitoring of Unnamed Waterbody 6 will be completed to confirm potential Project-related effects</li> </ul>	All
39	Wild Rice (7.9)	<ul style="list-style-type: none"> <li>A spill prevention and response plan will be developed and implemented to prevent contamination in the event of an accidental spill / leak</li> </ul>	All
40	Moose / Other Wildlife (7.10, 7.11)	<ul style="list-style-type: none"> <li>Clearing will be limited to the approved PA and mark the boundaries during site preparation to focus all clearing activities within the designated footprint and to maintain natural cover to adjacent areas</li> </ul>	C
41	Moose / Other Wildlife (7.10, 7.11)	<ul style="list-style-type: none"> <li>Mechanical vegetation removal practices will be used when possible</li> </ul>	C
42	Moose / Other Wildlife (7.10, 7.11)	<ul style="list-style-type: none"> <li>Salvage topsoil and the upper organic layer will help preserve the seed bank and soil microorganisms, which in turn can be used during revegetation, supporting the regeneration of forage species important to other wildlife</li> </ul>	C, O
43	Moose / Other Wildlife (7.10, 7.11)	<ul style="list-style-type: none"> <li>The revegetation plan will integrate reclaimed areas with the regional landscape using local, non-invasive plant species, including those significant to Indigenous communities, to restore natural habitats, support ecological succession, and outline strategies and timelines for both progressive and final reclamation in accordance with the certified Closure Plan</li> </ul>	C, O
44	Moose / Other Wildlife (7.10, 7.11)	<ul style="list-style-type: none"> <li>Scarifying compacted surfaces to promote natural revegetation will promote natural revegetation, improving soil permeability and supporting the regeneration of habitat structure</li> </ul>	CI
45	Moose / Other Wildlife (7.10, 7.11)	<ul style="list-style-type: none"> <li>The revegetation plan will integrate reclaimed areas with natural habitats, to support ecological succession</li> </ul>	CI
46	Species at Risk (SAR) (7.12)	<ul style="list-style-type: none"> <li>Implementation mitigation measures to reduce the potential for direct losses of protected habitat (e.g., bat roosts, Wolverine natal and maternal dens, nests) during vegetation removal</li> </ul>	All
47	Species at Risk (SAR) (7.12)	<ul style="list-style-type: none"> <li>Proposed mitigation measures will be implemented for noise and vibration mitigation, including the use of mufflers on all vehicles, generators, and heavy equipment, shutting down equipment that is not in use as reasonable and minimizing idling equipment and use acoustical enclosures, silencers, and noise barriers where possible to shield noise sources</li> </ul>	All
48	Species at Risk (SAR) (7.12)	<ul style="list-style-type: none"> <li>Schedule high-noise activities at applicable locations, outside of the sensitive periods for individual SAR, and / or implement other form(s) of mitigation, such as appropriate buffers, or obtain regulatory approval / permit(s)</li> </ul>	All
49	SAR (7.12)	<ul style="list-style-type: none"> <li>Minimize light spill and glare using shielding on stationary light sources and direct lighting downwards where practicable</li> </ul>	All
50	SAR (7.12)	<ul style="list-style-type: none"> <li>Provide wildlife and SAR awareness training to all staff and contractors, emphasizing the importance of minimizing noise and light disturbance to SAR</li> </ul>	All
51	SAR (7.12)	<ul style="list-style-type: none"> <li>If a Wolverine den is encountered, a den management plan will be prepared by a qualified professional, which will inform the activities that may proceed and during which times, within a biologically appropriate buffer to the Wolverine den</li> </ul>	All

Item	pVC (Key Section)	Commitment	Project Phase
52	SAR (7.12)	<ul style="list-style-type: none"> <li>A waste management plan will be developed for construction, operations, and closure that will store waste in wildlife-resistant containers and remove from site regularly. Employees will receive training on wildlife management and proper waste disposal.</li> </ul>	C, O
53	SAR (7.12)	<ul style="list-style-type: none"> <li>The use of bat gates and establishment of pollinator gardens at closure will be considered.</li> </ul>	CI
54	Land and Resource Use (7.13)	<ul style="list-style-type: none"> <li>Maintaining communication with trapline holders regarding activities and opportunities to facilitate land use activities.</li> </ul>	All
55	Land and Resource Use (7.13)	<ul style="list-style-type: none"> <li>Maintain regular communication with trapline holders regarding activities and opportunities to facilitate their land use activities. Work with the Ministry of Natural Resources and trapline license holders (LSFN members) to determine alternative options for trapline losses.</li> </ul>	C
56	Land and Resource Use (7.13)	<ul style="list-style-type: none"> <li>Where practical, maintain trees and other vegetation to provide a buffer for the view of Project components.</li> </ul>	C, O
57	Land and Resource Use (7.13)	<ul style="list-style-type: none"> <li>Stockpiles will be revegetated.</li> </ul>	CI
58	Land and Resource Use (7.13)	<ul style="list-style-type: none"> <li>Fishing and hunting within the PA is prohibited by employees, suppliers, and contractors while working or residing on site.</li> </ul>	All
59	Land and Resource Use (7.13)	<ul style="list-style-type: none"> <li>Maintain access to surrounding active aggregate extraction facilities located within the PA.</li> </ul>	All
60	Land and Resource Use (7.13)	<ul style="list-style-type: none"> <li>Post signage around the PA to alert local resource users of the presence of Project facilities and activities.</li> </ul>	All
61	Land and Resource Use (7.13)	<ul style="list-style-type: none"> <li>Maintain a compact Project area footprint to limit the removal of merchantable timber and overprinting of traplines or bait areas.</li> </ul>	C
62	Land and Resource Use (7.13)	<ul style="list-style-type: none"> <li>Practice progressive rehabilitation as areas are no longer required where practical.</li> </ul>	O
63	Land and Resource Use (7.13)	<ul style="list-style-type: none"> <li>Prohibit public access to the PA; maintain access to the LSA via existing roads and trails or planned future roads supported.</li> </ul>	All
64	Cultural Heritage (7.14)	<ul style="list-style-type: none"> <li>Potential Cultural Heritage Landscapes identified will be noted on applicable Project mapping to identify the heritage status on the Property to Project personnel.</li> </ul>	All
65	Archaeology (7.15)	<ul style="list-style-type: none"> <li>All archaeological sites identified during the Stage 2 archaeological assessment will be fully avoided by the Project.</li> </ul>	All
66	Archaeology (7.15)	<ul style="list-style-type: none"> <li>Archaeological sites identified in the Archaeological Assessments will be noted on applicable Project mapping with associated buffers to identify the management requirements for Project personnel and support the avoidance and protection of the identified sites.</li> </ul>	All
67	Archaeology (7.15)	<ul style="list-style-type: none"> <li>Areas of marine archaeological potential identified in the Marine Archaeological Assessment will be noted on applicable Project mapping to identify the management requirements for Project personnel.</li> </ul>	All
68	Archaeology (7.15)	<ul style="list-style-type: none"> <li>Terrestrial and marine chance find / inadvertent discovery procedures will be implemented through training and collaboration with Indigenous Nations.</li> </ul>	All
69	Local and Regional Economy (7.16)	<ul style="list-style-type: none"> <li>Project will preferentially hire qualified local and Indigenous labour, and contract local and regional businesses.</li> </ul>	All
70	Local and Regional Economy (7.16)	<ul style="list-style-type: none"> <li>Project will offer work and volunteer opportunities to youth.</li> </ul>	All
71	Local and Regional Economy (7.16)	<ul style="list-style-type: none"> <li>Implement the Project Diversity, Equity and Inclusion approach.</li> </ul>	All

Notes:

Great Bear Resources acknowledges that this list may be refined subsequent to Impact Statement submission with the Impact Assessment Agency of Canada  
C: Construction phase; O: Operations phase; CI: Closure phase

**Table B-2: Summary of Commitments – Federal Valued Components (fVCs)**

Item	fVC (Related Section)	Commitment	Project Phase
72	All	<ul style="list-style-type: none"> <li>Monitoring programs will be implemented to verify the accuracy of the predicted effects and assess the effectiveness of the implemented mitigation measures</li> </ul>	All
73	Fish and Fish Habitat (8)	<ul style="list-style-type: none"> <li>The integrated site water management will be fully established including the collection and treatment of site contact water during operations</li> </ul>	All
74	Fish and Fish Habitat (8)	<ul style="list-style-type: none"> <li>Prior to construction, a spill and emergency response plan will be developed to describe procedures to minimize the impact of accidental spills or releases of hazardous or deleterious materials. It will include steps for containment, cleanup, reporting, and preventing future incidents</li> </ul>	C
75	Fish and Fish Habitat (8)	<ul style="list-style-type: none"> <li>A Fish Rescue Plan will be prepared and submitted for approval with DFO and MNR prior to undertaking fish rescue and relocation activities</li> </ul>	C
76	Fish and Fish Habitat (8)	<ul style="list-style-type: none"> <li>Fish exclusion measures will be applied to waterbodies where remnant flow conditions are not capable of maintaining fish habitat or populations</li> </ul>	C
77	Fish and Fish Habitat (8)	<ul style="list-style-type: none"> <li>During construction (and other phases as applicable), implement a site-specific erosion and sediment control plan to mitigate the entry of sediment into surrounding waterbodies</li> </ul>	C
78	Fish and Fish Habitat (8)	<ul style="list-style-type: none"> <li>The Fish Habitat Offsetting and Compensation Plan will be implemented to mitigate changes to fish habitat</li> </ul>	C
79	Migratory Birds (9)	<ul style="list-style-type: none"> <li>Great Bear Resources has committed to ongoing engagement with Indigenous environmental monitors and the Environmental Management Committee, ensuring that Indigenous knowledge informs the monitoring of migratory birds and their habitats</li> </ul>	All
80	Migratory Birds (9)	<ul style="list-style-type: none"> <li>The Project will maintain open communication with communities regarding monitoring results, adaptive management measures, and opportunities for community input throughout the Project lifecycle</li> </ul>	All
81	Migratory Birds (9)	<ul style="list-style-type: none"> <li>Vehicles and equipment will be operated in such a way that impulsive noise is minimized, where practical</li> </ul>	All
82	Migratory Birds (9)	<ul style="list-style-type: none"> <li>Wildlife will be discouraged from inhabiting contact water ponds (including but not limited to the TMF pond, mine water pond and collection water pond)</li> </ul>	All
83	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>A camp complex will be established on the Property; Great Bear Resources will also continue discussions with local municipalities regarding potential housing and / or infrastructure initiatives in the region</li> <li>The camp complex will include recreation, and a non-denominational spiritual space</li> </ul>	All
84	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Maintain a dry camp, managed through Human Resources policy and specific Health and Safety measures</li> </ul>	All
85	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Provide emergency response and basic health services on site to reduce workforce-related pressures on local social and healthcare services; onsite medical facilities and staff will be in place to address health services for emergencies, injuries, and other routine needs</li> <li>Medical personnel will be trained on supports that are available through Employee Assistance Program, Telus telehealth (or similar service / provider), and local / regional providers to foster connected health care on and offsite</li> <li>Information about these services and supports (available to employees and their immediate families), will be posted in a visible location at the medical facilities and accommodations</li> </ul>	All
86	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Project Human Resources and medical staff will be specifically trained to recognize, prevent, and appropriately respond to incidents of violence, harassment, or trauma, in alignment with established protocols</li> </ul>	All
87	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Create access to Telus telehealth or similar provider for employees (and immediate family members) throughout the life of the Project helping to alleviate pressures on local services.</li> </ul>	All
88	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Required personal protection equipment will be provided including but not limited to boots, reflective clothing, gloves and hard hats</li> </ul>	All
89	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Controlled site access, security and monitoring technology will be used to deter and detect potential issues, with site security will be maintained and consistent with other Ontario mining operations</li> <li>Workers will be housed in separate accommodations by gender with locked access (e.g., keys) for each room and a separate mining dry / change rooms</li> <li>Ongoing monitoring will occur throughout the mine life and policies will be updated as required</li> </ul>	All
90	Indigenous Peoples (10,	<ul style="list-style-type: none"> <li>An Archaeological Resources Protection Procedure (Chance Find Procedure) has been established and will be maintained for the Project</li> </ul>	All

Item	fVC (Related Section)	Commitment	Project Phase
	11, 12, 13, 14)		
91	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Sponsor cultural awareness initiatives and social integration programming</li> <li>Address barriers to training or employment through transport assistance and inclusive program design</li> <li>Support regional communities to expand social services and health care services in the region, including mental health and addiction services, and implement an adaptive management approach (as part of the Social Performance Plan) to address additional pressures resulting from the influx of workers and their families</li> <li>Great Bear Resources will work collaboratively to fund programming through the Friendship Centre and community partners, including programming and supports to promote physical and mental health outcomes for Indigenous adults and youth</li> <li>Establish and maintain Community Liaison Committee to monitor changes and service capacities and / or the effectiveness of mitigation measures</li> <li>Continue to partner with community organizations and educational institutions to support youth programming through summer camps and in-school programming, provide workshops, tours and presentations to youth that promote careers and opportunities in mining and science, technology, engineering and math fields</li> <li>Partner with local Indigenous communities to evaluate community health and well-being to prevent negative pathways associated with the Project from developing</li> </ul>	All
92	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Great Bear Resources will engage with municipalities, Indigenous communities, and Kenora District Services Board regarding regional housing issues</li> <li>Great Bear Resources will work collaboratively to support for culturally appropriate housing initiatives led by Indigenous and municipal partners; include development of a housing strategy and plans for ongoing monitoring of housing capacity issues, and an adaptive management approach (as part of the Social Performance Plan) to address additional pressures imposed from the influx of workers and their families</li> <li>Great Bear Resources will work closely with Municipality of Red Lake and the Township of Ear Falls to support housing strategies that encourage workers to relocate to the area for work</li> </ul>	All
93	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Great Bear Resources will maintain relationships and discussions through the establishment of the Community Liaison Committee to monitor social and health service capacities</li> </ul>	All
94	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Collaborate with Friendship Centre, Kenora Sexual Assault Centre, and other safety advocates to support community-based safety networks</li> <li>Partner with the Friendship Centre, the Evolution Centre, and other community organizations to co-develop inclusive events that reflect local traditions and cultural practices</li> </ul>	All
95	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Great Bear Resources will work with provincial and Indigenous health and education authorities to plan for projected demand on social services, healthcare services (including secondary healthcare services), and education capacities</li> <li>Great Bear Resources will work with local health care providers to support recruitment initiatives and potential job share arrangements for increased local resident opportunities</li> </ul>	All
96	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>The Cultural Heritage Protection Plan will be developed with participating Indigenous Nations to support consistent protection of Indigenous heritage (including intangible values), archaeological and cultural heritage sites</li> <li>The Cultural Heritage Protection Plan will be a version controlled living document, updated through the Chance Find Procedure, with decisions documented jointly</li> <li>For the archaeological sites identified in or near the PA, archaeological reports have been shared with Indigenous communities and based on current input from LSFN and WFN, avoidance of all potentially affected archaeological sites has been selected as the mitigation</li> </ul>	All
97	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Voluntary health and wellness seminars, nutrition and substance use seminars will be provided for interested employees through the employee assistance program</li> </ul>	All
98	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Opportunities for youth with vocational skills will be provided, including those that prepare them for local job markets and mining-related knowledge</li> </ul>	All
99	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Budgeting and financial literacy tools will be available to all employees through the employee assistance program, including a combination of organized workshops during working hours and optional individual supports that employees and their families can access on their own time</li> <li>Deliver mandatory cultural awareness training for employees and contractors (including supervisors and managers) on safety, harassment awareness and prevention, and Missing and Murdered Indigenous Women, Girls and Two-Spirit people, and human trafficking awareness</li> </ul>	All
100	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Provide bursaries and targeted mentorship; mentorship programs may include new hire initiatives which pair up new employees with a senior staff member who will provide</li> </ul>	All

Item	fVC (Related Section)	Commitment	Project Phase
		<p>guidance and support during the onboarding process, internships and summer programming for youth.</p> <ul style="list-style-type: none"> <li>• Implement job-matching, retraining programs, and economic diversification supports in anticipation of closure</li> <li>• Establish an Industrial Research Chair in Mineral Exploration with Lakehead University</li> <li>• Great Bear Resources has, and will continue to support science, technology, engineering and math field and training strategy to focus on a range of opportunities including apprenticeship opportunities, on-the-job training, work readiness, and scholarships and bursaries.</li> <li>• Great Bear Resources will offer training to local Indigenous job seekers and contractors. Great Bear Resources are committed to working with local suppliers, including Indigenous owned businesses, to develop their capacity to effectively compete and win business while meeting the Company's standards for ethical conduct, due diligence, quality of goods and services, health and environmental safety.</li> <li>• Identify critical roles and recruitment barriers; provide job-readiness scholarships / bursaries</li> <li>• Develop equity-based hiring protocols, Indigenous procurement policies, and job coaching programs</li> </ul>	
101	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>• Great Bear Resources will work with the environmental management committee(s) and interested Indigenous members throughout the duration of the Project, to facilitate ongoing communications, sharing and integration of Indigenous knowledge and environmental information, and share and evaluate Project approvals, adaptive management and monitoring plans, and address emerging issues and interests identified by Indigenous Nations</li> </ul>	All
102	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>• Great Bear Resources will continue to work with the environmental management committee(s) and engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring for Project activities</li> </ul>	All
103	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>• Implement Fish Habitat Offset and Compensation plan which includes fish relocation from affected watercourses</li> </ul>	C, O
104	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>• Avoid the use of chemical herbicides</li> </ul>	All
105	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>• Reduce employment barriers by offering on-the-job training for almost qualified candidates and provide entry-level skills development</li> </ul>	All
106	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>• Support reasonable requests and work schedule flexibility for Indigenous employees relating to time off to pursue traditional land use and harvesting activities</li> <li>• Great Bear Resources will offer employees an Annual Fitness and Mental Health Benefit fund (\$500 per annum) which may be used to purchase gear and equipment which would facilitate land-based activities including but not limited to fishing equipment and snowshoes</li> </ul>	All
107	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>• Provide timely workforce projections to communities and vendors to support planning</li> <li>• Collaborate with regional providers to support recruitment and job-sharing</li> <li>• Increase local household income by prioritizing regional employment, ensuring that wages remain within the community and support local businesses</li> <li>• Identify critical roles and recruitment barriers; provide job-readiness scholarships / bursaries.</li> <li>• Develop equity-based hiring protocols, Indigenous procurement policies and job coaching programs</li> <li>• Partner with Indigenous training and employment organizations to support employment of Indigenous workers, provide training, priority hiring and work towards continuous improvement including training and employment opportunities for Indigenous women</li> </ul>	All
108	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>• Great Bear Resources is committed to incorporate appropriate ceremonial practices into the Project</li> <li>• Ceremonies will be held under the direction of local Indigenous Nations</li> </ul>	All
109	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>• Closure end land use objectives will be informed by ongoing consultation with local Indigenous Nations</li> <li>• Great Bear Resources is committed to progressively rehabilitating the mine site wherever practical to reduce potential erosion, improve stability and work towards meeting end land use objectives</li> </ul>	All
110	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>• Where there is interest, provide opportunities to local Indigenous community members to harvest plants for traditional purposes prior to construction activities.</li> </ul>	C
111	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>• Coordinate with regional and Indigenous suppliers to reduce supply strain and inflationary effects</li> <li>• Great Bear Resources is committed to working with local suppliers, including Indigenous owned businesses, to develop their capacity to effectively compete and win business while</li> </ul>	All

Item	fVC (Related Section)	Commitment	Project Phase
		<p>meeting the Company's standards for ethical conduct, due diligence, quality of goods and services, health and environmental safety</p> <ul style="list-style-type: none"> <li>Great Bear Resources will offer training to local Indigenous job seekers.</li> </ul>	
112	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Prohibit fishing and hunting within the PA by employees, suppliers, and contractors while working or residing on site.</li> </ul>	All
113	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Where practical, maintain trees and other vegetation to provide a buffer for the view of Project components</li> </ul>	All
114	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Great Bear Resources will work with provincial and Indigenous infrastructure authorities, if and where appropriate through the development and implementation of its Social Performance Plan</li> <li>In collaboration with local health care providers, support recruitment initiatives and potential job share arrangements for increased local resident opportunities</li> <li>In collaboration with regional organizations and government representatives, develop a social performance plan to outline activities and plans to invest in a range of focus areas, including local infrastructure development, education and skills-building</li> </ul>	All
115	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Develop a community transition plan in consultation with local Indigenous communities and groups, to include collaborative planning, implement job-matching, retraining programs, financial literacy workshops, and economic diversification supports in anticipation of closure</li> </ul>	O, CI
116	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Buses may be offered if there is sufficient interest (e.g., from the Red Lake Municipal Airport and from Ear Falls and Red Lake as well as local Indigenous communities) to limit personal vehicle traffic</li> <li>Busing may also be utilized to gather contractors and employees from larger hubs (i.e., Thunder Bay and Winnipeg) during the construction phase</li> </ul>	All
117	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Maintain regular communication with trapline holders regarding activities and opportunities to facilitate their land use activities</li> <li>Work with the Ministry of Natural Resources and trapline license holders (LSFN members) to determine alternative options for trapline losses</li> </ul>	All
118	Indigenous Peoples (10, 11, 12, 13, 14)	<ul style="list-style-type: none"> <li>Great Bear Resources will continue to consider supporting studies and future monitoring identified by Indigenous communities during all phases of the Project</li> </ul>	C, O CI

Notes:

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C: Construction phase; O: Operations phase; CI: Closure phase

**Table B-3: Other Impact Statement Commitments**

Item	Key Section	Topic	Commitment	Project Phase
119	3.0	Participation and Engagement	<ul style="list-style-type: none"> <li>Great Bear Resources will align with the Social Performance Management System through engagement activities with interested parties.</li> </ul>	All
120	3.0	Participation and Engagement	<ul style="list-style-type: none"> <li>Great Bear Resources will continue to engage with Indigenous communities (First Nations and Métis), government agencies and ministries, and stakeholder groups following the submission of the Impact Statement, to keep interested parties informed on the Project</li> </ul>	All
121	3.0	Participation and Engagement	<ul style="list-style-type: none"> <li>Great Bear Resources will adjust its engagement efforts based on feedback from stakeholders to be responsive to the interests and comments expressed</li> </ul>	All
122	3.0	Participation and Engagement	<ul style="list-style-type: none"> <li>Great Bear Resources will continue to work with the environmental management committee(s) and engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring</li> </ul>	All
123	3.0	Participation and Engagement	<ul style="list-style-type: none"> <li>Great Bear Resources commits to enabling stakeholders' participation in matters which affect them in order to allow for their feedback and perceptions to be taken into consideration throughout the life of the Project</li> </ul>	All
124	3.0	Participation and Engagement	<ul style="list-style-type: none"> <li>Great Bear Resources has committed to funding an Environmental Liaison position dedicated to the proposed project, supporting Lac Seul and Wabauskang First Nations.</li> </ul>	All
125	3.0	Participation and Engagement	<ul style="list-style-type: none"> <li>GBR is committed to incorporate appropriate ceremonial practices into the Project. Ceremonies will be held under the direction of local Indigenous Nations</li> </ul>	All
126	4.3	Alternatives	<ul style="list-style-type: none"> <li>Consider supplemental power sources as the Project advances</li> </ul>	All
127	4.4	Alternatives	<ul style="list-style-type: none"> <li>Great Bear Resources will consider adapting work schedules for inclusivity</li> </ul>	All
128	4.4	Alternatives	<ul style="list-style-type: none"> <li>Great Bear Resources will also continue discussions with local municipalities to support considerations for potential housing improvement or infrastructure initiatives in the region</li> </ul>	All
129	4.8	Alternatives	<ul style="list-style-type: none"> <li>Mine rock that is suitable will be used in site construction and maintenance to minimize the requirement for dedicated aggregate sources</li> </ul>	C, O
130	4.8	Alternatives	<ul style="list-style-type: none"> <li>Investigate the potential for mine rock being retained in the LP Central pit nearing the end of open pit operations</li> </ul>	O
131	4.14	Alternatives	<ul style="list-style-type: none"> <li>Energy-saving equipment and processes will be used where practical</li> </ul>	All
132	5.4	Project Description	<ul style="list-style-type: none"> <li>Geochemistry studies will continue as part of an ongoing geochemistry program over the life of the mine.</li> </ul>	All
133	5.5	Project Description	<ul style="list-style-type: none"> <li>Mine rock will be managed on the Project site according to source location and ML / ARD potential.</li> </ul>	All
134	5.6	Project Description	<ul style="list-style-type: none"> <li>Industry best practices for cyanide transport, storage and use will be used</li> </ul>	O
135	5.6	Project Description	<ul style="list-style-type: none"> <li>Total cyanide in the tailings after the cyanide destruction circuit in the process plant will be compliant with the International Cyanide Management Code</li> </ul>	O
136	5.7	Project Description	<ul style="list-style-type: none"> <li>A leak detection system for tailings pipelines will be installed that will conform to or exceed the industry standards and practices for pipeline leak detection.</li> </ul>	All
137	5.8	Project Description	<ul style="list-style-type: none"> <li>Great Bear Resources will work with the forestry management company, in collaboration with local Indigenous Nations, to maintain access to the south of the Property</li> </ul>	All
138	5.8	Project Description	<ul style="list-style-type: none"> <li>Materials that are potentially acid generating or non-potentially acid generating – metal leaching will not be used in road construction or maintenance</li> </ul>	All
139	5.15	Project Description	<ul style="list-style-type: none"> <li>Tanks will be protected against possible vehicular collisions as appropriate and secondary containment will be provided as applicable</li> </ul>	All
140	5.15	Project Description	<ul style="list-style-type: none"> <li>Care will be taken that incompatible materials are not stored in proximity, within the warehouse or other areas</li> </ul>	All
141	5.19	Project Description	<ul style="list-style-type: none"> <li>Formal risk assessments are conducted during project planning and updated as mining progresses to ensure closure objectives are met</li> </ul>	All
142	5.19	Project Description	<ul style="list-style-type: none"> <li>Ore stockpiled in the ROM, and LGO stockpiles during the construction and operations phases, will be processed prior to the start of closure</li> </ul>	O
143	5.19	Project Description	<ul style="list-style-type: none"> <li>The ability of the Viggo pit lake to remain isolated will be re-assessed later in the mine life to modify closure design if needed</li> </ul>	O
144	5.19	Project Description	<ul style="list-style-type: none"> <li>Water level and water quality will be monitored while the LP Central pit is filling with water to confirm predictions on pit lake water quality and the ability to meet regulatory requirements to allow passive discharge when filled; the pit lake will be maintained at a lower level by treating and pumping excess water to the Chukuni River, until such time as all regulatory requirements are met</li> </ul>	Cl
145	5.20	Project Description	<ul style="list-style-type: none"> <li>An independent board of experts (Independent Tailings Review Panel) has been established to review and advise on the design, construction, operation, performance and closure of the TMF</li> </ul>	All

Item	Key Section	Topic	Commitment	Project Phase
146	5.20	Project Description	<ul style="list-style-type: none"> <li>Design and operations will follow Mining Association of Canada / Canadian Dam Association guidelines</li> </ul>	C, O
147	16.6	Accidents and Malfunctions	<ul style="list-style-type: none"> <li>Design of the LP Central pit will be continuously refined by a qualified geotechnical and mine persons to confirm the open pit designs meet or exceed industry stability standards</li> </ul>	C, O
148	16.6, 16.7	Accidents and Malfunctions	<ul style="list-style-type: none"> <li>Geotechnical monitoring will be established to identify potential instabilities in the open pits and mitigation measures will be put in place before an issue arises</li> </ul>	C, O
149	16.8	Accidents and Malfunctions	<ul style="list-style-type: none"> <li>Project is subjected to third party review by members of the Kinross Independent Tailings Review Panel, which will provide independent technical review of the design, construction, operation, performance and closure planning of the TMF over the Project life.</li> </ul>	All
150	16.8	Accidents and Malfunctions	<ul style="list-style-type: none"> <li>The Project will have a qualified person dedicated to the design, supervision and safe construction and operation of the TMF and TMF pond facilities</li> </ul>	C, O
151	16.9	Accidents and Malfunctions	<ul style="list-style-type: none"> <li>Dam designs will be developed according to industry standard and best management practices and will have an inspection and monitoring program including instrumentation to monitor for signs of a potential slope stability or overtopping issue</li> </ul>	All
152	16.10	Accidents and Malfunctions	<ul style="list-style-type: none"> <li>The Dixie Creek flood protection berm will be maintained in a good condition and will be inspected during high rain or flooding events as per operation, maintenance and surveillance documentation</li> </ul>	All
153	16.11	Accidents and Malfunctions	<ul style="list-style-type: none"> <li>A spill prevention and response plan will be developed to address potential onsite spill scenarios including from pipelines that will consider potential onsite spill scenarios, including prevention, contingency planning and reporting practices for the timely and effective response</li> </ul>	All
154	16.11	Accidents and Malfunctions	<ul style="list-style-type: none"> <li>Prior to construction, Great Bear Resources will develop a pipeline safety and surveillance plan which will be implemented over life of Project</li> </ul>	All
155	16.17	Accidents and Malfunctions	<ul style="list-style-type: none"> <li>A Blasting Management Plan will be developed that will include management considerations, offset distances, clearing procedure and specifics for both open pit and underground operations Destruction of explosives (such as those unfit for use) and misfire procedures will be according to applicable regulatory requirements and guidance and undertaken by qualified personnel</li> </ul>	All
156	16.17	Accidents and Malfunctions	<ul style="list-style-type: none"> <li>The mine site emergency response team will be trained in response measures associated with the use of explosives</li> </ul>	All
157	16.18	Accidents and Malfunctions	<ul style="list-style-type: none"> <li>Companies contracted to transport hazardous materials for the Project will be required to have an emergency response plan or equivalent for the materials being carried, and a protocol for managing spills</li> </ul>	All
158	16.19	Accidents and Malfunctions	<ul style="list-style-type: none"> <li>Chemical tanks volumes will be confirmed using a dip check or other method, with the result logged for comparison and record keeping</li> </ul>	All
159	16.19	Accidents and Malfunctions	<ul style="list-style-type: none"> <li>Spill response and management procedures will be regularly reviewed as part of the environmental management system</li> </ul>	All
160	16.19	Accidents and Malfunctions	<ul style="list-style-type: none"> <li>Appropriate spill kits containing spill response equipment and absorbent materials will be stored on site at strategic locations across the Project</li> </ul>	All
161	16.22	Accidents and Malfunctions	<ul style="list-style-type: none"> <li>Great Bear Resources has developed an emergency response plan for current site activities and will update this plan to develop an emergency response plan for the accidents and malfunctions</li> </ul>	All
162	17.4	Effects of the Environment	<ul style="list-style-type: none"> <li>Communication will be established by Great Bear Resources with the Ministry Natural Resources early in each fire season and Project personnel will be assigned to monitor the fire season and propose safety programs for the Project, so that there is an early warning and rapid response can be made to any wildfire threat</li> </ul>	All
163	17.4	Effects of the Environment	<ul style="list-style-type: none"> <li>Evacuation plans will be developed to support the safe transportation of people from area using the main access road to Highway 105, or forestry trails if for any reason the main access road is not available</li> </ul>	All
164	17.5	Effects of the Environment	<ul style="list-style-type: none"> <li>An assessment of the potential effects of climate change including extreme weather events, will be completed nearer the end of the mine life, to assess if overtopping of the Viggo pit walls has become a credible scenario in the long term</li> </ul>	O
165	18.1	Benefits of the Project	<ul style="list-style-type: none"> <li>As appropriate, underrepresented demographic profiles will also be considered when developing hiring strategies</li> </ul>	All
166	18.2	Benefits of the Project	<ul style="list-style-type: none"> <li>Great Bear Resources will encourage and support training to support hiring of residents from local communities and local Indigenous communities to acquire the necessary skills to help prepare for Project employment, particularly for the operations phase</li> </ul>	All
167	18.2	Benefits of the Project	<ul style="list-style-type: none"> <li>Great Bear Resources are committed to working with local suppliers, including Indigenous owned businesses, to develop capacity to effectively compete and win business while meeting the Project requirements for ethical conduct, due diligence, quality of goods and services, health and environmental safety</li> </ul>	All
168	18.2	Benefits of the Project	<ul style="list-style-type: none"> <li>Employment commitments include to: develop equity-based hiring protocols, Indigenous procurement policies and job coaching programs</li> </ul>	All

Item	Key Section	Topic	Commitment	Project Phase
169	18.2	Benefits of the Project	<ul style="list-style-type: none"> <li>Employment commitments include to: support reasonable requests and work schedule flexibility for Indigenous employees relating to time off to pursue traditional land use and harvesting activities</li> </ul>	All
170	18.2	Benefits of the Project	<ul style="list-style-type: none"> <li>Education and training commitments include to: partner with Indigenous training and employment organizations to support culturally appropriate recruitment and retention, identifying critical roles and supporting the identification of recruitment barriers</li> </ul>	All
171	18.2	Benefits of the Project	<ul style="list-style-type: none"> <li>Education and training commitments include to: provide job-readiness scholarships and bursaries</li> </ul>	All
172	18.2	Benefits of the Project	<ul style="list-style-type: none"> <li>Well-being commitments include to: deliver safety, harassment awareness and prevention, and Missing and Murdered Indigenous Women, Girls, and Two-Spirit Plus people, awareness training for Project staff and contractors</li> </ul>	All
173	18.5	Benefits of the Project	<ul style="list-style-type: none"> <li>Great Bear Resources will retain a risk register over the life of the mine to track and adapt as appropriate</li> </ul>	All
174	18.8	Benefits of the Project	<ul style="list-style-type: none"> <li>Consultation and engagement will continue throughout the life of the mine</li> </ul>	All
175	20	Follow-up and Monitoring	<ul style="list-style-type: none"> <li>A follow-up program will be implemented for each fVC to verify the accuracy of the prediction of environmental effects of the Project and evaluate the effectiveness of the proposed mitigation measures</li> </ul>	All
176	20	Follow-up and Monitoring	<ul style="list-style-type: none"> <li>Surrogate monitoring required by regulatory instrument will be used to confirm the accuracy of the effects assessment and the efficacy of the mitigation measures for pVCs</li> </ul>	All
177	20	Follow-up and Monitoring	<ul style="list-style-type: none"> <li>A summary annual FUP report will be prepared of the results of the fVC follow-up program and pVC surrogate follow-up information, and provided to the Impact Assessment Agency of Canada by July 1 each year, and ANA, LSFN, NWOMC and WFN, and will be available for viewing at the Project site</li> </ul>	All
178	20	Follow-up and Monitoring	<ul style="list-style-type: none"> <li>As part of Great Bear Resources commitment to adaptive management, as new information becomes available that allows verification of the environmental effects and determination of the efficacy of the mitigation measures proposed in the Impact Statement, the follow-up and monitoring program may be modified in response</li> </ul>	All
179	20	Follow-up and Monitoring	<ul style="list-style-type: none"> <li>The existing grievance procedure will be modified as needed to document and respond to inquiries, concerns, complaints and grievances (collectively termed grievances for the remainder of this section) received during all phases of the Project</li> </ul>	All
180	20	Follow-up and Monitoring	<ul style="list-style-type: none"> <li>Resolution of grievance to be completed within 30 days of receipt of a grievance form where reasonable</li> </ul>	All

Notes:

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