

APPENDIX F

October 1, 2024

Neskantaga First Nation

Office of the Chief and Council
PO BOX 105
Lansdowne House
Ontario, P0T 1Z0

Attention Chief Moonias:

I am writing in response to your letter dated July 3, 2024 (the “July Letter”) regarding the proposed Eagle’s Nest Project (the “Project”). The July Letter returns to certain themes covered in our letter sent to the community on March 27, 2024 (the “March Letter”), though some new elements have also been highlighted in your July Letter. I will do my best to offer further clarifications to address your most recent comments and concerns. We also want to reiterate our interest in engaging in direct dialogue with you on these important issues and finding ways to support the community’s participation in that dialogue, as further outlined below.

Access to Project Information

The July Letter states, in part, that Wyloo “has not answered the specific questions that we posed” and further that the community is “unable even to understand the risks [of the Project] because Wyloo is not sharing the information that we need with us.” These statements indicate that our March Letter may not have been as clear on certain points as it could have been. In the March Letter, we said the following with respect to the technical questions posed by the community in the letter you sent on February 14, 2024 (the “February Letter”):

We also appreciate that several of the technical questions posed in the February Letter have not been directly addressed, though we have provided preliminary responses to the questions as set out in the attached to support an initial discussion. **In certain instances, we do not yet have specific information because detailed studies are still underway and are not yet completed** – in other cases, we are not able to provide answers because the questions relate to projects which are not being advanced by Wyloo. [emphasis added]

The bolded portion above explains that preliminary responses on certain questions were provided to the community by Wyloo in the March Letter, while others were not because “detailed studies are still underway”. Respectfully, the portion of the July Letter which states Wyloo is “not sharing” information suggests we have the relevant information and are withholding it from the community, which is not accurate.

Regardless, I want to emphasize Wyloo is committed to providing the community with this additional information on the Project in the future as our technical studies advance – information which I appreciate that the community is seeking which it does not currently have. We have prepared a preliminary schedule that outlines when we expect to be able to share this information (please see Schedule “A” attached).

In sharing this additional information, we do want to emphasize our view that such disclosures are best executed and most effective when paired with in-person meetings to enable open dialogue. Our key principles are rooted in transparency and ensuring meaningful and inclusive participation of Indigenous communities, and we believe there is no replacement for direct engagement in identifying issues of concern and clarifying points that are unclear. In-person engagement allows for open discussion on those issues in a manner which written exchanges are not able to replicate.

As noted in the July Letter, communities are not necessarily well placed to review detailed technical information on their own. Even if a community was well placed, it would still be beneficial for that community to engage directly with the proponent to help develop a fuller and more complete understanding of a proposed project. I would emphasize that the suggested direct engagement with Neskantaga can be structured to ensure that it is not inappropriately construed as consultation on the Project, but rather it would be solely an information sharing exercise.

The “Glass Box” and Enhanced Engagement

In the July Letter, you noted the following on our “glass box” initiative:

You state in your letter that Wyloo is committed to what it calls a glass box approach, meaning that information is shared with Indigenous rights-holders. **This is well and good, if a community has both the time to review this information and the expertise to understand technical reports, but it is no replacement for a comprehensive assessment.** [emphasis added]

Wyloo has not indicated, either directly or indirectly, that the glass box approach is intended to be a “replacement for a comprehensive assessment” and we want to make that point clear. Rather, the “glass box” approach is intended to level the playing field for potentially impacted communities to ensure they have access to relevant information *through all phases* regarding the Project. This approach is geared to ensuring a broader range of relevant information on the Project is made available to as many people, community members and advisors as possible (beyond what is required in ‘comprehensive assessments’) to facilitate efficient and relevant information sharing with communities.

Separately, I do appreciate the point that access to information, on its own, is not sufficient. Communities also need access to relevant expertise and time to review that information. The intent of the “glass box” is to institutionalize and provide easy access to relevant information, alleviating communities of the burden of having to specifically request information, just as Neskantaga did in its February Letter to Wyloo.

One of the fundamental flaws of comprehensive assessments is that information is collected and presented in an overly technical and complicated manner. These assessments generate mountains of paper and very little of it is directly usable by communities to effectively understand either potentially adverse impacts or practical options for addressing them. As a result, communities must retain external consultants at great expense to review those materials and to convert them into an understandable format. It is ultimately an inefficient process that places huge capacity burdens on communities. But it does not need to be this way.

Rigorous reviews can be done far more efficiently and with a greater emphasis on community input to guide assessment priorities and present contextualized information to potentially impacted communities in an accessible manner (while simultaneously ensuring full access to underlying information to enable independent verification or audit).

At Wyloo, we are committed to designing a more transparent process to address these deficiencies. That commitment is not limited to just an upfront planning/assessment phase. Rather, it extends to all project phases (e.g., design, development, commissioning, operations and closure). We would very much like to advance this work with your direct participation if it is possible to facilitate.

I appreciate that our invitation to participate in developing this approach would itself place a burden on Neskantaga's existing resources. Wyloo is committed to facilitating Neskantaga's participation in this dialogue and we would welcome a discussion on options for providing capacity support if the community is open to that discussion.

We also believe that part of the capacity constraint could potentially be addressed through collaboration with other First Nation communities that have an interest in the Project. We know communities have distinct cultures and priorities, which warrants independent engagement. But as First Nations share many of the same fundamental concerns on industrial development of this type, finding a way to effectively pool resources among potentially impacted communities could, if done well, offer an opportunity to reduce the burden on individual communities to participate in this work.

We also want to emphasize that this participation can be structured in a manner that ensures it would not be construed as consultation on the proposed Project itself and we are very open to participating in exploratory discussions to identify the best mechanisms to achieve this objective.

Environmental Assessment

In the July Letter, you also noted the following:

We strongly believe that the only way we will be able to gather and assess the information we need about the mine's risks is through environmental assessment processes. As such, **we are asking Wyloo to commit to submit the Eagle's Nest mine to both the provincial environmental assessment that Noront has already undertaken to perform, and to a federal impact assessment. Following these reviews, Neskantaga will apply its own legal protocols to decide whether our free, prior and informed consent can be granted.**

As we noted in the March Letter, the Project is currently subject to an approved Terms of Reference (ToR) that was developed under the Environmental Assessment Act (Ontario). As noted in the March Letter, given the fundamental changes to the scope of the proposed Project, the existing ToR will either need to be materially amended or potentially replaced with an alternate review process. The Company is advancing discussions with the Province to identify workable options and will provide an update once these have been identified.

In terms of the Impact Assessment Act (Canada) (the "IAA"), the Project is well below the threshold for an Impact Assessment as defined in the Physical Activities Regulation to the IAA, as outlined in

the March Letter. Importantly, the transition provisions of the IAA also stipulate that the Act has no application to projects for which an assessment process was underway at the time the IAA was passed into law, which is the case for the Eagle's Nest Project.

Notwithstanding the foregoing, we would welcome a full conversation on these topics to ensure we fully understand the community's perspective on these points.

Exploration Permit

Regarding mineral exploration permit application PR-23-000347, Ley Lake, BMA 522 871 & BMA 523 871, NW Region.

Wyloo has acquired claims in the Ley Lake area based off a preliminary understanding of an elevated mineral potential in this area. In respect of your sacred sites, harvesting grounds and other significant community values in this area, we would like to leave this permit on hold with Ontario. Should we withdraw the permit, the claims will lapse in 2025, where it is likely that another company will register them. By retaining the permit, Wyloo will be able to place our existing claims on hold as well, ensuring those claims do not lapse in 2025 and preventing that terrain from being exposed to staking by third parties.

Wyloo would welcome the opportunity to support your community in discussions with the Province to identify and potentially withdraw 'Sites of Aboriginal Cultural Significance' ("SOACS") in this area well ahead of any proposed work that might take place in the future. This approach would offer a robust path to ensuring Neskantaga's sensitive and important values in this area are protected from any mineral exploration activity, whether advanced by Wyloo or another company in the future.

For more information about Ontario's Policy on SOACS, I invite you to review their policy and contact the Indigenous Consultation and Partnership Branch at the Ministry of Mines.

https://www.geologyontario.mndm.gov.on.ca/mines/lands/policies/sites_of_aboriginal_cultural_significance_policy_e.html

In closing, we greatly appreciate the community's willingness to raise questions and identify important issues for our consideration. We welcome all opportunities to engage on topics of interest to Neskantaga and hope that this dialogue will continue and deepen in the coming months and years.

In particular, we would ask you to consider our offer for capacity support to assist the community in participating in direct dialogue with the company in information sharing sessions. As we noted, we are very open to structuring those engagements in a manner that eliminates the risk to the community of these being considered as consultation.

Regards,

<original signed by>

Kristan H. Straub
CEO Canada, Wyloo

Schedule A

Estimated Dates for Availability of Project Information

The following information is available for presentation as of the date of this letter:

- Environmental baseline collection program and data collected to date
- Current Project design
- Current activity at Esker Site and planned activity through 2025
- Proposed approach on environmental management (including community-led monitoring, governance framework, adaptive management)
- Proposed approach on community partnership options for the proposed development (business development, labour force planning)

The following information will be available for presentation at the dates set out below:

- Updated Project design once feasibility study is completed – expected June 2025
- Updated propped development schedule once feasibility study is completed – expected June 2025