Initial Project Description

Lawyers-Ranch Project

December 17, 2025

THESIS GOLD
1075 West Georgia, Suite 1050, Vancouver, BC V6E 3C9

Revision Record

Revision	Date	Revision Description
0	November 3. 2025	Issued for regulatory review
1	December 9, 2025	Re-issued regulatory submission to address British Columbia's Environmental Assessment Office and the Impact Assessment Agency of Canada's comments.
2	December 17, 2025	Re-issued for updates

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Notes: * The EA Technical Team relied on the data, information and engagement summaries provided by Thesis without full verification.			

Statement of Limitations

This document has been prepared by One-Eighty Consulting Group Inc. (One-Eighty) and reviewed and finalized by Chu Cho Environmental LLP (CCE) and SLR Consulting (Canada) Ltd. (SLR) as the Environmental Assessment (EA) Technical Team, in accordance with the scope of work and all other terms and conditions of the agreement between such parties. The EA Technical Team acknowledges and agrees that its client, Thesis Gold Inc. (Thesis), may provide this report to government agencies, interest holders, and/or Indigenous Nations as part of project planning or regulatory approval processes. Copying or distribution of this report, in whole or in part, for any other purpose other than as aforementioned is not permitted without the prior written consent of the EA Technical Team and Thesis.

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Executive Summary

Thesis Gold Inc. (Thesis) proposes to construct and operate the Lawyers-Ranch Project (the Project), a combined underground/open-pit gold and silver mine in the Toodoggone mining region of northern British Columbia (BC).

With an estimated production rate of 5.1 million tonnes per year, the Project is subject to environmental assessment processes under the BC *Environmental Assessment Act* and the *Impact Assessment Act* of Canada. The environmental assessment (EA) processes involve evaluating potential effects of a project on the environment, social well-being, economy, culture, and health of the Project area. The provincial and federal environmental assessment processes provide important opportunities for Indigenous Nations, government agencies, and the public to review and provide feedback on the Project that is considered in in the approval decisions by provincial and federal ministers.

The Project is located approximately 450 km north-northwest of Prince George and 275 km north of Smithers. It is situated on Crown land that has a long history of mining and mineral exploration. The Project area is on lands that are administered by the Province of BC and overlaps with the traditional territories of Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation.

Project Location and Context

Quick facts

- **Mineral deposits**: Gold and silver
- **Anticipated production rate**: approximately 5.1 million tonnes/year
- **Estimated Project life**: 14 to 20 years, followed by comprehensive reclamation
- **Mineral extraction methods**: Underground and open pit
- **Onsite personnel**: Annual average of more than 500 workers during peak operations
- **Regulatory requirements**: BC *Environmental Assessment Act* and *Impact Assessment Act* of Canada, in addition to numerous permits from BC and federal agencies

Project Purpose, Rationale, and Benefits

The Project proposes to extract and process gold and silver ore to meet increasing economic and industrial demands for minerals in the medical, electronics, renewable energy, and aerospace industries as well as for investment purposes. They also carry a high intrinsic value, often being used to hedge against inflation and times of economic uncertainty.

Local benefits from the Project include:

- Long-term and predictable contracting and employment, with training and other opportunities for nearby Indigenous Nations
- Employment in local businesses and service industries to help offset the effects of declining forestry and diversify the economies of nearby communities

Prioritizing Environmental Stewardship and Collaborative Planning

Thesis' approach to exploration and Project development is rooted in practical environmental stewardship and collaborative decision-making, and founded on positive, long-term working relationships.

As early as 2018, Thesis has engaged with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation to inform Project planning and design, existing conditions data collection, developing mitigation and monitoring programs, and reaching equity ownership agreements.

Thesis will continue to engage with potentially affected Indigenous Nations with Aboriginal Rights and interests that may be affected by the Project.

- Since exploration began, Thesis has implemented the following working principles:
    - Share Project benefits with Indigenous Nations through equity opportunities, contracting and employment, capacity building, and other economic initiatives.
    - Enable early and ongoing participation from Indigenous Nations in environmental field programs and monitoring, as well as Project planning and design.
    - Integrate Indigenous Knowledge and science systems to inform planning, design, and decision-making throughout Project development.
    - Minimize new impacts to land (where feasible) by using existing disturbance and infrastructure and conduct progressive reclamation to restore land as the Project advances.

Thesis is advancing the Lawyers-Ranch Project in collaboration with nearby Indigenous Nations and local communities, with an emphasis on responsible development, environmental stewardship, and long-term social and economic benefits.

Indigenous Engagement

Through in-person meetings, site visits, community workshops, and communication, Thesis understands that the Nations are interested in topics that include:

- Outlining preferred methods for participation in the EA process
- Understanding potential effects and mitigations of open-pit mining methods
- Collecting existing conditions data for nearby, culturally significant species and sites
- Understanding potential effects of Project activities on the land, and the potential spread of non-native, invasive plant species on wildlife and hunting
- Influencing design decisions about the Project and other forms of meaningful engagement
- Understanding management of cumulative effects in the Toodoggone region
- Identifying and protecting archaeological and heritage resources
- Facilitating in-community engagement and site visits for Nation leadership and Elders
- Accessing the Project area for traditional and cultural activities while restricting public access
- Securing economic opportunities and capacity funding

Thesis is taking steps to address the interests identified during engagement. Thesis will identify potential Project-related effects and propose mitigation measures during the EA.

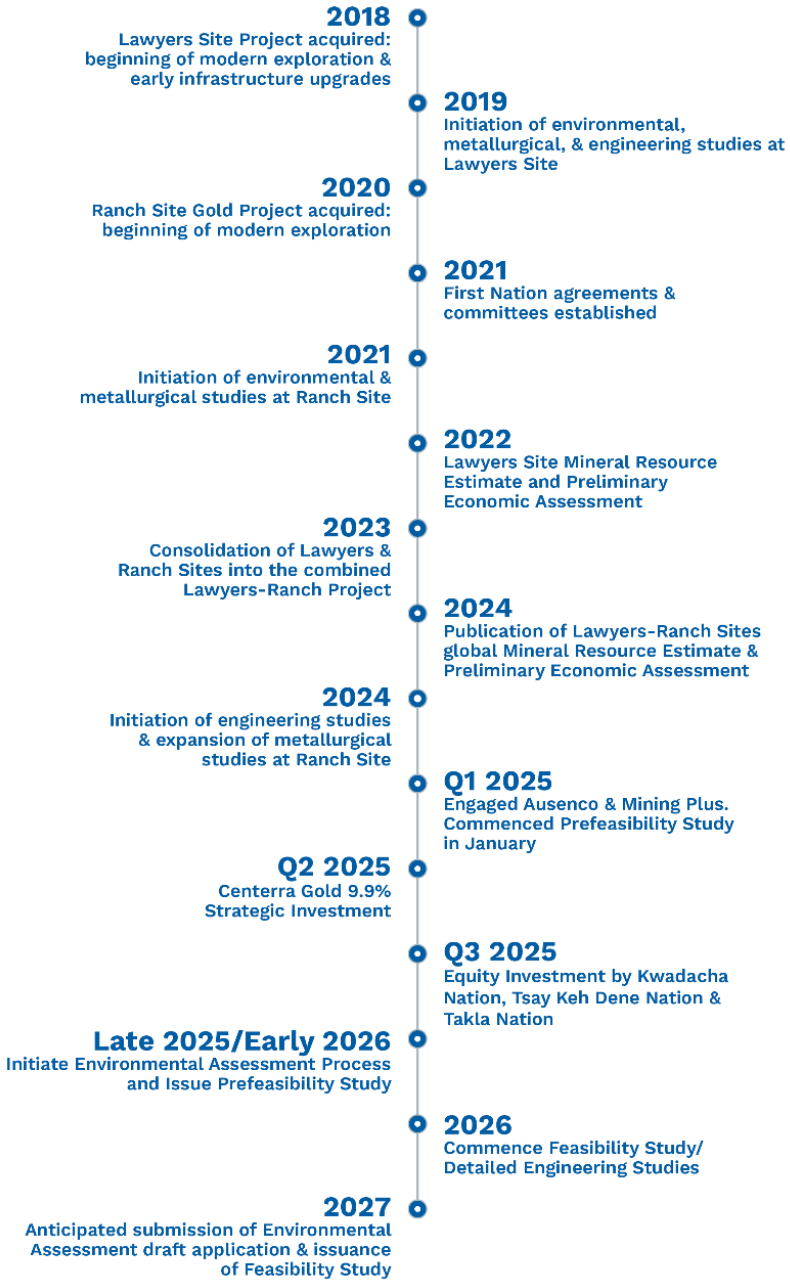
Government, Public and Stakeholder Engagement

Indigenous Collaboration

- Equity ownership agreements with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation
- Awarded over $50 million in contracts with Indigenous Nation-owned or affiliated companies to date
- Collaborating on existing conditions studies and data collection, and monitoring and environmental management plans
- Advancing agreements for information sharing and collaboration during the EA
- Conducting regular meetings and creating joint committees

- Thesis will continue to identify interested parties and continue to engage with municipalities and regulatory authorities as part of the EA and permitting processes.
- Thesis will continue to identify and engage with potentially affected members of the public and stakeholders, including those who use the area for recreational purposes, hunting, trapping, and fishing, or other economic activities.

Project Timeline



Major project milestones

Thesis merged with Benchmark Metals Inc. in 2023, resulting in the consolidation of the Lawyers and Ranch projects into a single Project. Developing a single Project reduces the Project's overall disturbance footprint and contribution to cumulative effects in the region by leveraging shared infrastructure.

Both sites have a long history of mineral exploration dating back to the 1960s, including the operation of the historical Cheni Mine from 1989 to 1992.

Legislative and Regulatory Context

The proposed production rate for the Project is approximately 5 million tonnes per year. At this production rate, the Project is reviewable under the BC *Environmental Assessment Act* and the federal *Impact Assessment Act*. The Project is likely to proceed through a substituted process led by the BC Environmental Assessment Agency. A substituted EA would effectively create a single review process while ensuring both levels of government retain their authority to decide whether the Project proceeds and under what conditions.

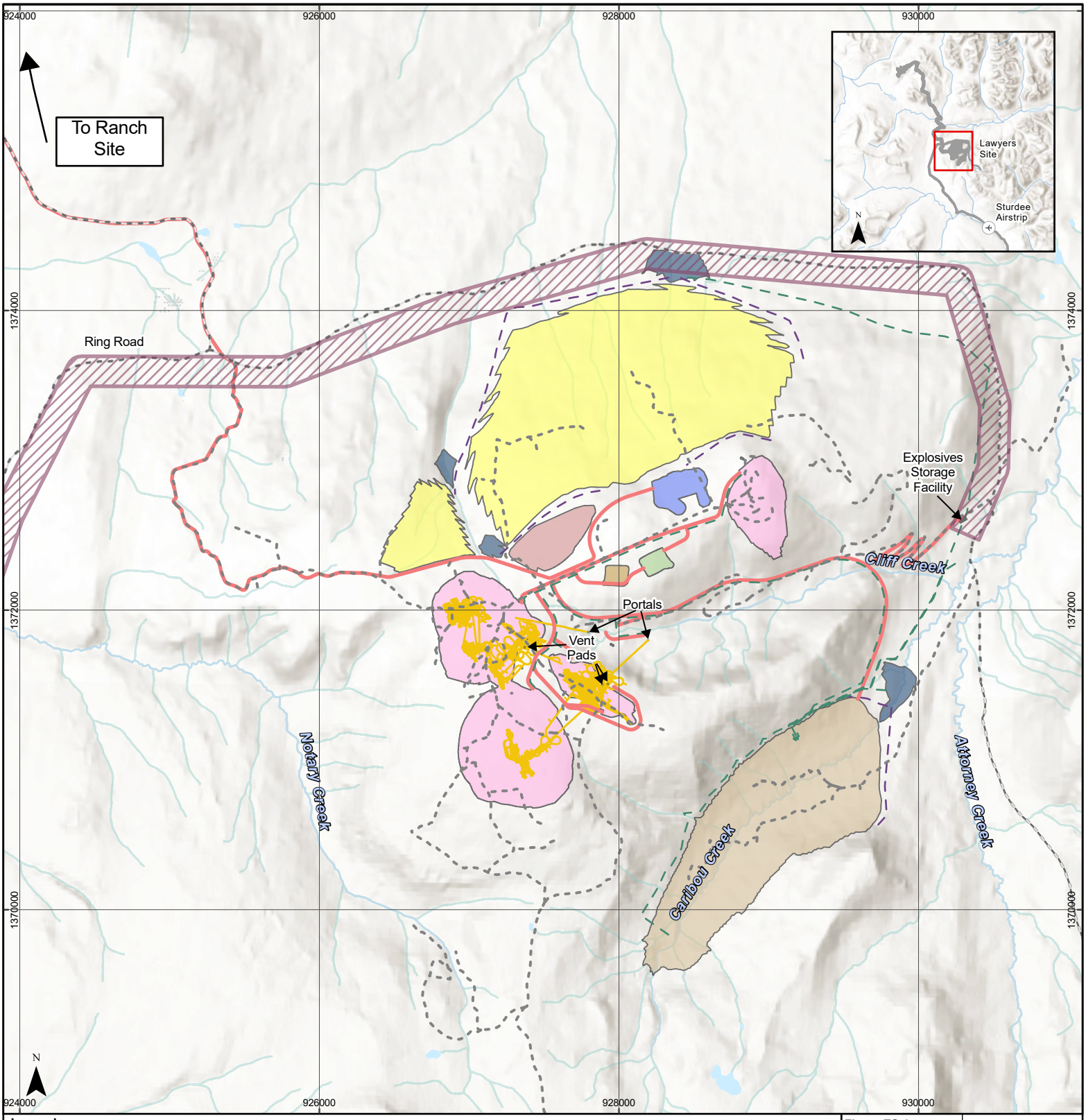
Project planning and design will be completed in stages, with multiple opportunities for Indigenous Nation, public, and government feedback, including as part of the Early Engagement phase of the EA process (commencing late 2025).

Additional provincial and federal permits, licenses and approvals will also be required.

Project Description

The EA will consider the components and activities involved with constructing, operating, and closing/reclaiming the Project. The project components include:

- **Mining facilities and infrastructure**: Underground and open pit mineral extraction areas, facilities, and equipment
- **Ore processing plant**: Facility where mined material will be processed and refined into doré and concentrate
- **Tailings management facility**: Storage facility and infrastructure to transport byproducts from the ore processing plant
- **Waste rock storage facilities**: Areas where unused mined materials will be stored
- **Accommodations complex**: Facilities to house approximately 500+ workers
- **Power supply:** The Lawyers Site is planned to be powered by hydro-electric power and will use diesel generators for emergency backup power. The Ranch Site will be powered by diesel generators.
- **Site access and onsite roads**: Upgrades to approximately 29 km of existing roads and construction of approximately 15 km of new haul roads
- **Water supply for mining and processing**: Construction of diversion ditches to capture runoff, groundwater wells, and water recycling facilities
- **Facilities that support Project operation and maintenance**: Onsite waste and recycling and various storage and ancillary facilities



Legend

- Existing Access Road
- Existing Roads
- Watercourse
- Collection and Diversion Channel
- Pipeline
- Access Road
- Underground Mining Area
- Open Pit Areas
- Ore Processing Plant
- Waste Rock Storage Facility
- Tailings Management Facility
- Potential Transmission Line Extension Corridor
- Accomodations Complex
- Water Management Pond
- Ancillary Facilities
- High Grade Stockpile

North American Datum 1983
NAD 1983 BC Environment Albers

Map Center Coordinates: -127.20567° 57.33435°
Project Coordinates: -127.282014° 57.402529°
Project NTS Map: 94E
Scale: 1:35,000

Source Notes:
1. Basemap Data: GeoBC Data Distribution
2. Basemap: ESRI Topographic
3. Data supplied by Thesis Gold on 2025-01-16
4. Prepared by Chu Cho Environmental

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Kilometres

Figure ES-1
Rev. 2

December 17, 2025

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Project Layout - Lawyers Site

Lawyers-Ranch Project
Initial Project Description

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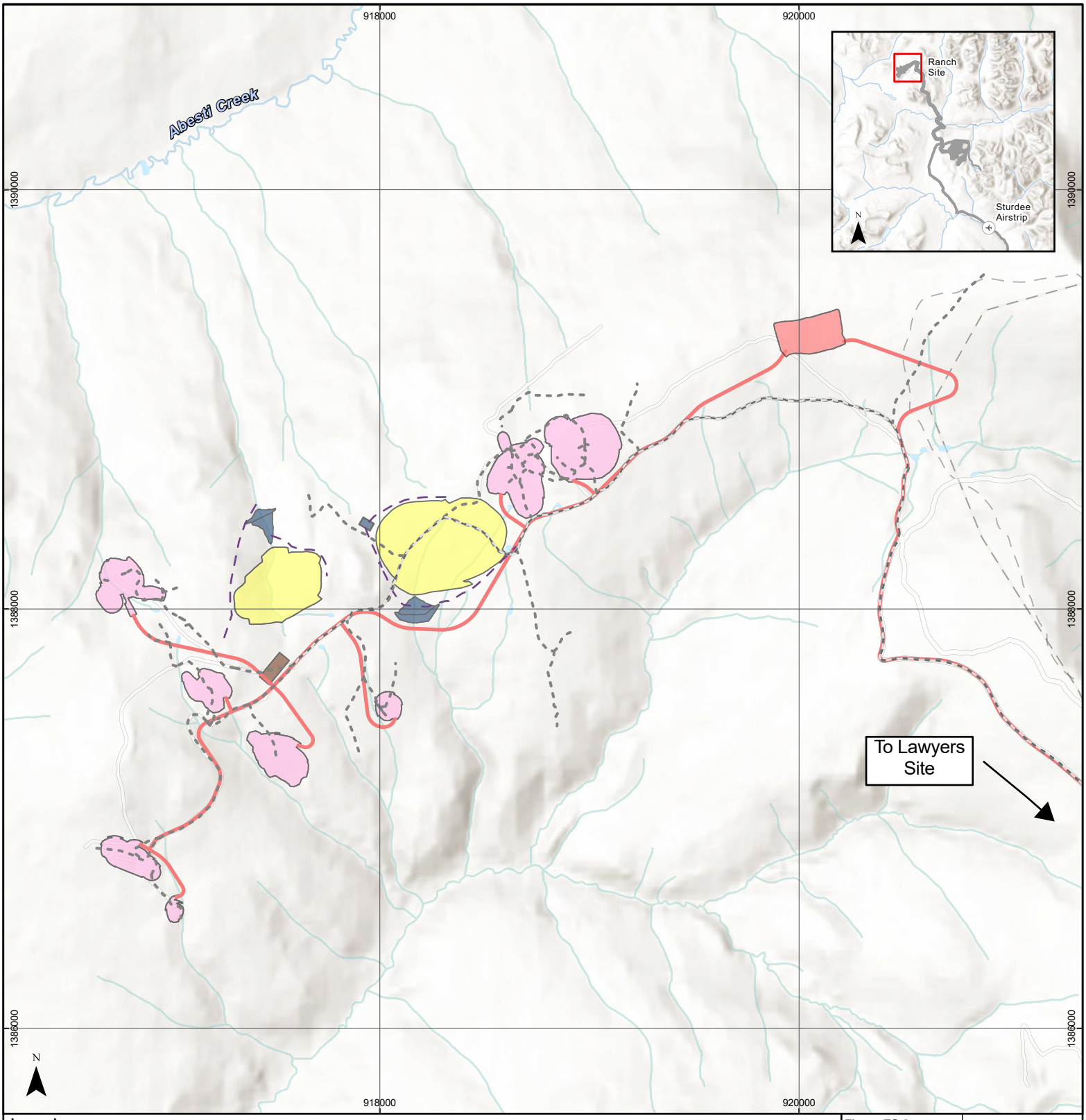

Legend

- Existing Access Road
- Existing Roads
- Watercourse
- Collection and Diversion Channel
- Access Road
- Open Pit Areas
- Waste Rock Storage Facility
- Water Management Pond
- Water Treatment Plant
- Ore Stockpile Pad

North American Datum 1983
NAD 1983 BC Environment Albers

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Project NTS Map: 94E
Scale: 1:25,000

Source Notes:
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4. Prepared by Chu Cho Environmental

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Kilometres

Figure ES-2
Rev. 2

December 17, 2025

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Project Layout - Ranch Site

Lawyers-Ranch Project
Initial Project Description

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Proposed Project Phases and Estimated Durations

Project Phase	Description	Estimated Duration
Construction	Early works and development construction (i.e., construction of key project infrastructure).	2 years
Operation	Underground and open pit mineral extraction methods, and progressive reclamation, where feasible.	14-20 years
Closure	Decommission buildings and infrastructure, haul away materials, and reclaim the Project sites.	1 year
Post-closure	Care and maintenance of the site.	Until applicable permit and agreement requirements are met

Work to Date and Potential Effects

Thesis initiated studies of existing conditions in the Project area in 2021. These studies draw on available data sources and were planned and undertaken by Indigenous Nation-owned or affiliated companies. The table below summarizes the studies that have been completed in the Project area to date.

Summary of Existing Condition Studies Completed to Date

Topic Studied	Work to Date
Air Quality	Air quality and dust fall monitoring from 2021-2025.
Acoustics	Noise monitoring from 2021-2025.
Surface water	Monthly surface water sampling and monitoring since 2021 Targeted existing conditions study at culturally important lakes.
Groundwater	Quarterly groundwater sampling since 2022.
Soil and Vegetation	Soil sampling and vegetation surveys undertaken starting in 2022, including. • Ecosystem and vegetation mapping, and • Rare plant surveys in 2025.
Wildlife	Field surveys initiated over 5 years ago. Wildlife cameras deployed to support adaptive management during exploration and inform the understanding of current wildlife use. Bird surveys in 2022 and 2023.
Fish and Fish Habitat	Field surveys initiated in 2021. Sampling of sediment and invertebrates. Monitoring fish abundance and distribution.
Social and Economics	Information gathering through engagement, census data, and local and publicly available data.

Topic Studied	Work to Date
Archaeological and Heritage Resources	Archeological Overview Assessments since 2021. Indigenous participation in archaeological field work.

A preliminary list of identified Project-related potential effects is provided below.

Potential Project Effects

Topic	Potential Project Effects
Air quality	• Changes in dust • Changes in particulate matter • Changes in air quality
Acoustics	• Changes in noise levels at site • Changes in noise levels along haul roads
Surface water	• Changes to surface water • Changes to sediment quality • Changes to stream flows
Groundwater	• Changes to groundwater quality • Changes to groundwater quantity
Soil	• Changes to soil quality • Changes to soil quantity
Landscape and Terrain	• Changes to local landscape features • Changes to topography
Vegetation	• Changes to plant species and communities of interest • Changes to wetland functions • Changes to ecosystems
Wildlife, Including Culturally Valued, Species at Risk and Migratory Birds	• Loss or alteration of wildlife habitat (direct loss and indirect loss resulting from sensory disturbance) • Changes to wildlife health • Changes to mortality risk • Changes to seasonal habitat use, including use by migratory birds and species at risk
Fish and Fish Habitat, Including Aquatic Species at Risk	• Changes to instream and riparian habitats • Changes in water flows and quality • Changes to fish health
Social and Economic	• Changes to community wellbeing and social determinants of health • Changes in the quality and quantity of resources • Changes to access to the land • Changes to local employment and contracting opportunities

Topic	Potential Project Effects
	• Changes to labour income • Changes to regional economy • Changes to sites of historical, archaeological, or cultural importance • Changes to community infrastructure and services resulting from regional use by the workforce and to support the Project • Changes to transportation and infrastructure
Indigenous Nations Culture, Interests, and Rights	• Changes to community wellbeing and social determinants of health • Changes in the quality and quantity of resources including fish, wildlife, vegetation, or ecosystems of cultural value • Changes to access to the land • Changes to connection with land, culture and community, including peaceful enjoyment of the land • Changes to local employment and contracting opportunities • Changes to labour income • Changes to regional economy • Changes to physical and cultural heritage • Changes to the current use of lands and resources for traditional purposes • Changes to any structure, site, or thing that is of historical, archaeological, paleontological, or architectural significance • Changes to ability to exercise Aboriginal Rights and Title • Changes to locations of historical, archaeological, or cultural importance

Potential Cumulative Effects

Cumulative effects are the combined impacts of past, present, and future human activities. If the Project is expected to cause lasting negative effects on a VC, those effects will be examined alongside other activities in the area that may contribute to similar impacts. Inputs for the Project's cumulative effects assessment will be informed by engagement during the EA.

Thesis has identified a preliminary list of reasonably foreseeable work and activities to consider as part of a cumulative effects assessment. These include existing and planned forestry and mining operations, activities at the Sturdee airstrip, commercial hunting, recreation, as well as existing and planned roads and transmission lines.

Next Steps

The EA process includes opportunities for Indigenous, government, stakeholder, and public participation.

Additional technical studies, existing conditions studies, and assessment of potential effects conducted as part of the EA will also inform refinements to Thesis' Project design and assessments of the Project's economic feasibility. The Preliminary Economic Assessment is available on our website.

Thesis will continue to update the Project website with future engagement opportunities and Project details.

Learn more

- **Project Information**: thesisgold.com/lawyers-ranch-project
- **Provincial Government EA Process**: projects.eao.gov.bc.ca

List of Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AIA	Archaeological Impact Assessment
AIR	Application Information Requirements
ACFP	Archaeological Chance Find Procedure
BC	British Columbia
Benchmark	Benchmark Metals Inc.
CDC	Conservation Data Centre
Cheni	Cheni Gold Mines Inc.
DFO	Fisheries and Oceans Canada
DPD	Detailed Project Description
EA	Environmental Assessment
EAA	Environmental Assessment Act
EAO	Environmental Assessment Office
ECCC	Environment and Climate Change Canada
EMLI	Ministry of Energy, Mines and Low Carbon Innovation
ENV	Ministry of Environment and Parks
EP	Engagement Plan
EPIC	Environmental Assessment Office Project Information Centre
FS	Feasibility Study
FSR	Forest Service Road
GHG	greenhouse gas
IAA	Impact Assessment Act
IAAC	Impact Assessment Agency of Canada
IPD	Initial Project Description
KLUPP	Kaska–BC Land Use Planning Project
LRMP	Land and Resource Management Plan
MCM	Ministry of Mining and Critical Minerals
ML	metal leaching
MOTT	Ministry of Transportation and Transit
NPAG	non-potentially acid generating
OP	open pit
OPP	ore processing plant

Acronym/Abbreviation	Definition
PEA	Preliminary Economic Assessment
PFS	Pre-Feasibility Study
Project	gold-silver mining project in the Toodoggone mining region of British Columbia, named the Lawyers-Ranch Project
Province	Province of British Columbia
Reserve	Indian Reserve, as defined by the *Indian Act*
RFA	Reconciliation Framework Agreement
RMZ	Resource Management Zone
SARA	Species at Risk Act
TAC	Technical Advisory Committee
TCG	Tahltan Central Government
TMF	Tailings Management Facility
TSF	Tailings Storage Facility
Thesis	Thesis Gold Inc.
VC	Valued Component
WLRS	Ministry of Water, Land and Resource Stewardship
WRSF	waste rock storage facility

Symbols and Units of Measurement

Symbol/Unit	Definition
$	Canadian dollars
%	percent
+	plus
°C	degrees Celsius
CO_2	carbon dioxide
tCO_2e	tonnes carbon dioxide equivalent
ha	hectare
$ktCO_2e$	kilo tonnes of carbon dioxide equivalent
km	kilometre
m	metre
L	litre
m^3/day	cubic metres per day
m^3/year	cubic metres per year
masl	metres above sea level
Mt	megatonne
Mtpa	million tonnes per annum
tpd	tonnes per day

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Appendices

1.0 Introduction

Thesis Gold Inc. (Thesis) is proposing to construct and operate a gold-silver mining project in the Toodoggone mining region of British Columbia, named the Lawyers-Ranch Project (the Project), which is located approximately 450 kilometres (km) north-northwest of the City of Prince George and 275 km north of the Town of Smithers and is situated on Crown land in British Columbia (BC), administered by the Province of British Columbia (Province) (Figure 1-1). The Project partially overlaps with the traditional territories of Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation.

The Project area was previously disturbed by the Cheni Mine, a past-producing mine operated by Cheni Gold Mines Inc. (Cheni). Thesis intends to leverage existing infrastructure from the former Cheni Mine to minimize the amount of new disturbance created by the Project. Existing infrastructure from the former Cheni Mine includes roads and trails, underground mining areas, and the nearby Sturdee Airstrip. Several other exploration companies in the area are currently using this airstrip (JDS 2024).

The Project has mineral deposits that are best accessed through both underground and open pit (OP) mining methods. The Project's anticipated production rate is approximately 5.1 million tonnes per annum (Mtpa) on average, with a mine life of approximately 14 to 20 years (depending on the development and refinement of the Mine Plan). The ore processing plant (OPP) will produce doré and concentrate. Doré is an unrefined, dense brick of gold, whereas concentrate is typically in powdered form and shipped in large totes. Ore will be processed at an annual average rate of 5.1 Mtpa, or an annual average of 13,700 tonnes per day (tpd). The maximum annual throughput is estimated to be approximately 5.5 Mtpa. With the implementation of design features, the OPP would have the maximum capacity of 15,000 tpd of processed ore. The Project is anticipated to require approval under both the BC *Environmental Assessment Act* (EAA) and the federal *Impact Assessment Act* (IAA).

The submission of this Initial Project Description (IPD) to the BC Environmental Assessment Office (EAO) represents the Project's formal entry into the Early Engagement phase of the BC EAO process. Submission of the IPD and a Plain Language Summary to the Impact Assessment Agency of Canada (IAAC) represents formal entry into the Planning Phase of the IAAC process. The *Impact Assessment Cooperation Agreement between Canada and British Columbia* (Government of Canada and BC Gov. 2020) can enable a "substituted" regulatory process for projects that require the approval of the Minister of Environment and Climate Change. In such cases, both agencies rely on the assessment administered by one government (although both retain separate decision-making authority at the end of the assessment). It is expected that the EAO and IAAC will coordinate the initial phases of their respective processes and the EAO will request that the Project proceed through a substituted process led by the EAO.

The purpose of this IPD is to provide an initial high-level summary of the current information available on the Project to inform the public and other participants. The Project is subject to further development, refinement, and amendment. As the Project is refined and additional technical details and supporting materials become available, such information and content will be integrated into future Project submissions to the EAO and IAAC, such as the Detailed Project Description and Environmental Assessment (EA) Application. Feedback from Indigenous Nations, which was provided in comments on a draft version of this document, is reflected in the revisions of this IPD.

Thesis initiated engagement with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation as early as 2018. The Nations have participated, to varying degrees, in the development and implementation of environmental field programs and co-design initiatives relating to Project components that have design flexibility. Several agreements with these Indigenous Nations have been executed, including agreements to guide collaboration on exploration activities and the EA process.

Thesis has also entered into equity agreements with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation, who have chosen to invest in the Project to share in its future success. Similar arrangements are being explored with Tahltan Nation. This foundational work is intended to position the Project to move forward with shared oversight and mutual benefit.

Legend

- Lawyers-Ranch Project
- Sturdee Airstrip
- Kemess Mine
- Town and Community
- Emergency Services
- Existing Transmission Line
- Highway
- Forest Service Road
- Potential Transmission Line Extension Corridor
- NTS Mapsheet Grid

North American Datum 1983
NAD 1983 BC Environment Albers

Map Center Coordinates: -124.9119° 55.94954°
Project Coordinates: -127.282014° 57.402529°
Project NTS Map: 94E
Scale: 1:2,500,000

Notes:
1. Basemap Data: GeoBC Data Distribution
2. Basemap: ESRI Topographic
3. Data supplied by Thesis Gold on 2025-01-16
4. Prepared by Chu Cho Environmental

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Kilometres

Figure 1-1
Rev. 2

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Project Location

Lawyers-Ranch Project
Initial Project Description

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2.0 Proponent Information

Thesis is a Canadian mineral resource development and exploration company based in Vancouver, BC, and is the owner and operator of the Project. Contact information for Thesis is provided below in Table 2-1.

Table 2-1: Primary Contact Information for Thesis Gold Inc.

Contact Information	
Head Office	Thesis Gold Inc. 1075 West Georgia Street, Suite 1050 Vancouver, BC, Canada V6E 3C9
E-mail	community@thesisgold.com
Website	https://thesisgold.com/
Phone Number	(416) 662-9978
Thesis Representative	Stephen Crozier Thesis Gold Inc. Executive VP, External Affairs & Sustainability
Principal Contact for the Environmental Assessment	Carmen Holschuh One-Eighty Consulting Group Inc. community@thesisgold.com

2.1 The Thesis Approach

Thesis' approach to exploration and Project development is rooted in practical environmental stewardship and collaborative decision-making. Thesis believes positive, long-term working relationships with potentially affected Indigenous Nations will lead to the best possible version of the Project.

Thesis seeks to do more than meet the minimum regulatory requirements. To enable this, a set of working priorities guides Project development, including:

- Enable early and ongoing participation from Indigenous Nations in environmental field programs and monitoring, employment and contracting, Project planning and design, and equity ownership.
- Integrate Indigenous Knowledge and science systems to inform planning, design, and decision-making throughout Project development.
- Where feasible, minimize new impacts to land by using existing disturbance and infrastructure, and carry out progressive reclamation to restore land as the Project advances.

Further details on Thesis' ongoing efforts to advance these priorities are provided in the sections below.

2.1.1 Indigenous Collaboration in Project Design

Collaboration between Thesis and Indigenous Nations has aimed to inform the Project's planning from the start; encompassing exploration activities, mine design, existing conditions data collection, development of mitigation and monitoring programs, and preparation of this IPD. Thesis has engaged with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation since 2018 to collaboratively develop and implement existing environmental conditions studies, monitor wildlife and water resources, and identify areas the Nations recognize as warranting protection or special consideration. The perspectives of these Indigenous Nations will continue to be implemented into planning and designing the Project with shared insight and responsibility.

Key examples of Indigenous Nation collaboration to date include:

- **Equity Ownership**: Thesis has also worked with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation to offer opportunities for direct financial equity in the Project. Initial equity agreements are already in place with these Indigenous Nations. Thesis has made, and will continue to make, efforts to explore similar opportunities with Tahltan Nation. This evolving ownership structure reflects a broader vision and shared oversight that extends into shared opportunity.
- **Collaborative Project Design**: Thesis has worked with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation to begin integrating their perspectives into Project planning and design. These Nations participated in a 2021 tailings and waste rock storage alternatives assessment and a 2025 workshop to gather initial feedback on Project components with design flexibility. These early activities have influenced the design and provided a foundation for continued collaboration as the Project advances through future design and assessment stages.
- **Capacity Building**: Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation's involvement have been prioritized through annual capacity funding, training, and onsite contracting and employment opportunities, resulting in over $50 million (Canadian dollars) in contracts to Indigenous-owned or affiliated businesses to date.
- **Reclamation and Restoration**: The Project is located on the site of the former Cheni Mine. Approximately 90 percent (%) of land disturbed by the company's exploration activities has been reclaimed since Thesis began exploration work at the Project site. This work has been guided by a Reclamation Plan developed in collaboration with Indigenous Nations and is overseen by a team of full-time reclamation supervisors throughout the field season.
- **Wildlife Protection**: A Caribou Mitigation Strategy and broader Wildlife Monitoring and Management Plan were developed for exploration activities in collaboration with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation to track and respond to the presence of caribou and other wildlife in the Project area. An extensive wildlife camera network supports this work and will inform the assessment of potential Project effects.

- **Environmental Management**: Indigenous Nation-owned and affiliated businesses have designed and carried out studies to characterize existing environmental conditions for the Project and monitor effects of ongoing work.
- **IPD and Engagement Plan (EP) Input**: Thesis engaged early with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation to inform them of the development of the IPD and EP (Appendix F). Draft materials were provided to these Nations for review and comment prior to official regulatory submission. Thesis considered the feedback that was received and engaged with the Nations to discuss how their input was incorporated into the IPD and EP.

Several adjustments to the Project's layout and design have resulted from this collaborative foundation with Indigenous Nations:

- **Project Footprint**: Thesis merged with Benchmark Metals Inc. (Benchmark) in 2023 (see Section 3.3 for more details), resulting in the consolidation of the Lawyers and Ranch projects into a single Project. Developing a single Project reduces the Project's overall disturbance footprint and contribution to cumulative effects in the region by using shared infrastructure such as the ore processing plant (OPP) and Tailings Management Facility (TMF) (see Table 4-1). The consolidation aligns with concerns expressed by Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation regarding cumulative impacts and proximity to harvesting and other culturally important areas.
- **Placement of Infrastructure**: Following feedback from Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation on alternative options for infrastructure placement, Thesis preliminarily relocated the Tailings Storage Facility (TSF) to avoid a culturally sensitive area. Similarly, a transmission line routing option was also removed based on feedback from these Nations. Discussions regarding infrastructure placement remain ongoing.
- **Reclamation Objectives**: Thesis is advancing a native plant propagation program with participation from members of Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation. This work is in support of using locally sourced plant species in progressive reclamation efforts and eventual mine closure. The program has been enhanced by Indigenous Knowledge and input since its start in 2023, including direct participation of Indigenous Nations in early program development and seed and stem collection.
- **Archaeological Investigations**: Archaeological investigations have been and will continue to be carried out with support from Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation to identify areas of heritage and cultural value.

This ongoing collaborative work underscores Thesis' approach to building a Project with success, benefits, and a legacy shaped and carried by those with strong connections to the land.

A detailed account of Thesis' engagement with Indigenous Nations to date, and how Thesis plans to carry out engagement through the EA, is provided in the EP (Appendix F) and summarized in Section 6.0, Indigenous Nations Interests and Engagement, below.

3.0 Project Overview

This section outlines key information about the Project, including its purpose and benefits, geographic context, development history, anticipated schedule, existing permits and approvals, and information about the upcoming EA and permitting processes.

3.1 Purpose, Rationale, and Benefits of the Project

The purpose of the Project is to produce gold-silver doré and concentrate (forms of processed gold and silver ore) to support increasing economic and industrial demands, while providing mutual benefits to Indigenous Nations and supporting economic growth at both the provincial and national levels.

The unique properties of gold and silver make them essential to the development of technology, with applications in the medical, electronics, renewable energy, and aerospace industries. Gold and silver also carry a high intrinsic value, often being used to hedge against inflation and times of economic uncertainty. Global demand for both gold and silver is growing.

Many rural communities have historically relied on the forest industry for jobs and economic stability. The Project is expected to help offset the effects of the declining forest industry. The Project can help diversify local economies, support local businesses, and increase employment and contracting opportunities. Thesis is committed to being a leader in the Canadian mining industry and bringing benefits to the region in a responsible and sustainable manner through the construction and operation of the Project. For example, during the exploration phase Thesis has supported Indigenous economic participation by providing over $50 million in contracting opportunities to Indigenous Nation-owned or affiliated companies.

The Project is anticipated to create direct and indirect employment in exploration, mining, processing, and support services, benefiting both urban and rural regions of BC. These programs include opportunities and preferential selection programs for local suppliers and businesses. These preferential selection programs for local suppliers and businesses will be developed in consultation with both Indigenous and non-Indigenous local suppliers. It is currently estimated that the Project will require more than 500 onsite personnel when operating at peak capacity. Workers will be housed on-site in an accommodations complex that will be able to house approximately 500+ workers. The primary workforce is anticipated to come from communities throughout western Canada. Thesis has and will continue to prioritize:

- Training and skill exposure across all disciplines to encourage more people into the workforce.
- Employment and contracting opportunities are open to qualified members.
- Businesses of local Indigenous Nations throughout the Project phases.

Examples of direct and indirect employment opportunities by sector that may result from the Project are presented in Table 3-1.

Table 3-1: Examples of Direct and Indirect Employment Opportunities That May Result from the Project, by Service Line

Service Line	Project Activities That May Generate Potential Opportunities for Employment (Direct and Indirect) and for Local Suppliers and Businesses
Direct mine-related services	• Drilling and exploration • Earthworks and construction • Heavy machinery (operation, supply, maintenance) • Accommodation complex construction and maintenance • Environmental services (monitoring, reclamation)
Operations and support services	• Catering and accommodation complex services • Transportation and logistics (trucking, air services, shipping, personnel transportation) • Environmental monitoring • Security and safety services (site security, safety, training)
Procurement and supply chain	• Fuel supply and distribution • Construction materials • Consumables • IT and communications
Post-mining	• Reclamation and remediation • Environmental monitoring
Professional and specialized services	• Environmental monitoring and data collection • Geological, engineering and consulting • Cultural and heritage resource management • Legal, regulatory, and permitting support • Training and workforce development programs

3.2 Project Location

The Project is located in north-central BC, approximately 480 km northwest of the City of Prince George and 275 km north of the Town of Smithers (Figure 1-1).

The Project is located on provincial Crown land and consists of 100 contiguous mining claims (41,268 hectares [ha]) (Figure 3-1). Thesis owns 100% of the mineral claims either directly or indirectly through its wholly owned subsidiary Thesis Gold (Holdings) Inc. A list of claims and ownership is presented in Table A-1 of Appendix A. The claims are in good standing as of the writing of this document, and Thesis has exclusive decision-making authority over Project operations.

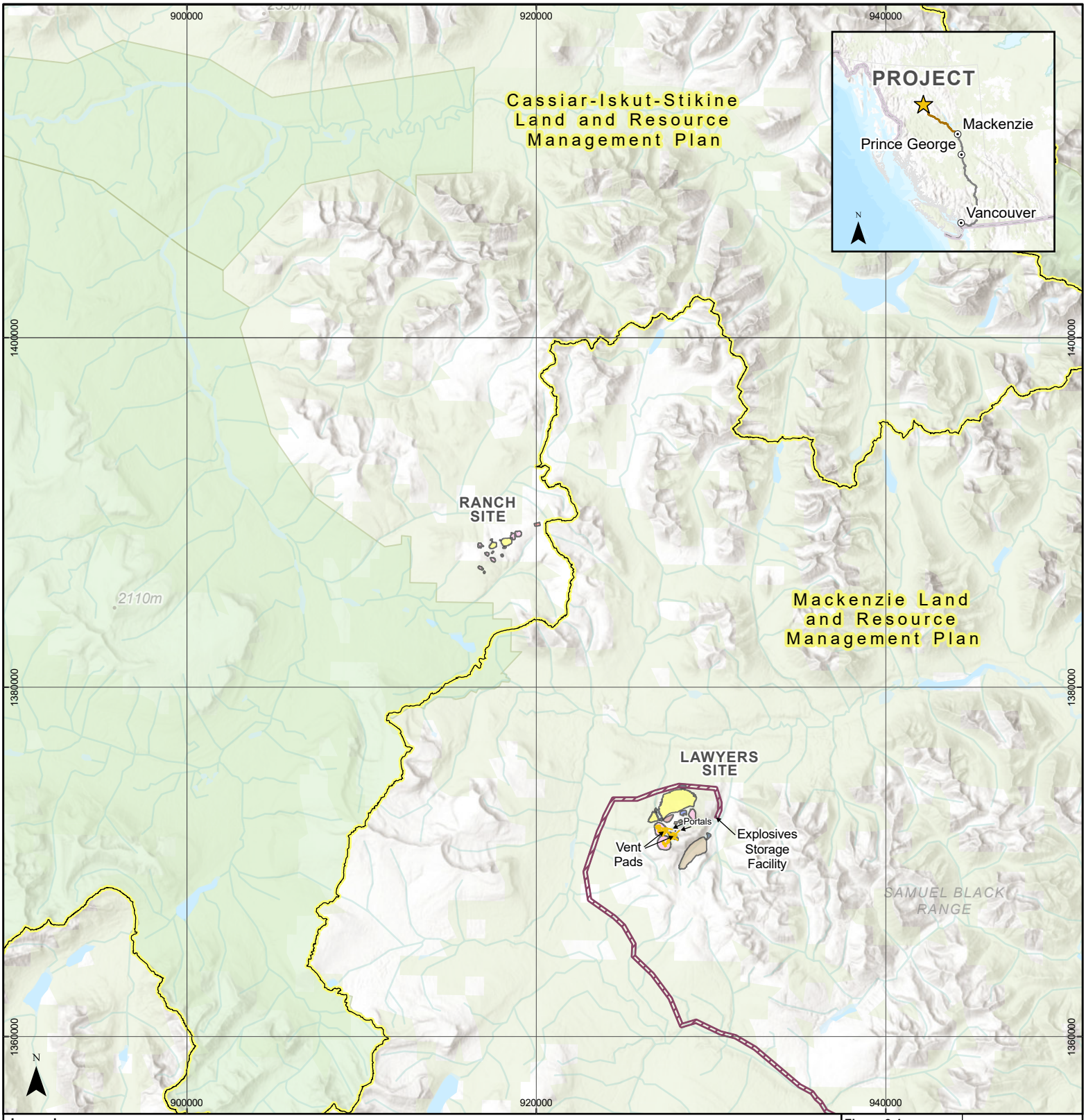
The Project is accessible primarily via the Finlay Forest Service Road (FSR), which originates south of the District of Mackenzie and connects to the Omineca Resource Access Road or “Kemess Road.” The coordinates for the Project center point (between the Lawyers and Ranch sites’ mineral deposits) are approximately Universal Transverse Mercator Zone 9 603229, 6355804. The communities and areas of interest nearest to the Project are summarized in Table 3-2 below and are illustrated in Figure 3-2.

Table 3-2: Local Communities and Areas of Interest

Category	Local Communities	Approximate Distance from Project (km)		Direction from Project
		By Road[1]	Straight Line	
Kwadacha Nation	Kwadacha (Fort Ware)	534	99	East
Tsay Keh Dene Nation	Tsay Keh Dene	648	150	Southeast
Takla Nation	Takla Landing	461	228	South
Tahltan Nation	Dease Lake	1,561	201	Northwest
	Iskut	1,449	168	West
	Telegraph Creek	1,367	238	West
Local Municipalities	Mackenzie	464	347	Southeast
	Prince George	625	481	Southeast
	Smithers	850	292	South

Note: Approximate distances were measured in a straight line to the edge of the Project footprint outline.

[1] GeoBC (2017).



Legend

- Access Road
- Forest Service Road
- Land and Resource Management Plan
- Lawyers - Ranch Project Tenure
- Underground Mining Area
- Open Pit Areas
- Ore Processing Plant
- Waste Rock Storage Facility
- Tailings Management Facility
- Potential Transmission Line Extension Corridor
- Accomodations Complex
- Water Management Pond
- Water Treatment Plant
- Explosives Storage Facility
- Ancillary Facilities
- High Grade Stockpile
- Ore Stockpile Pad

North American Datum 1983
NAD 1983 BC Environment Albers

Map Center Coordinates: -127.32865° 57.46754°
Project Coordinates: -127.282014° 57.402529°
Project NTS Map: 94E
Scale: 1:300,000

Source Notes:
1. Basemap Data: GeoBC Data Distribution
2. Basemap: ESRI Topographic
3. Data supplied by Thesis Gold on 2025-01-16
4. Prepared by Chu Cho Environmental

0 6 12
Kilometres

Figure 3-1
Rev. 2

December 17, 2025

THESIS GOLD

Lawyers-Ranch Project Mineral Tenure

Lawyers-Ranch Project
Initial Project Description

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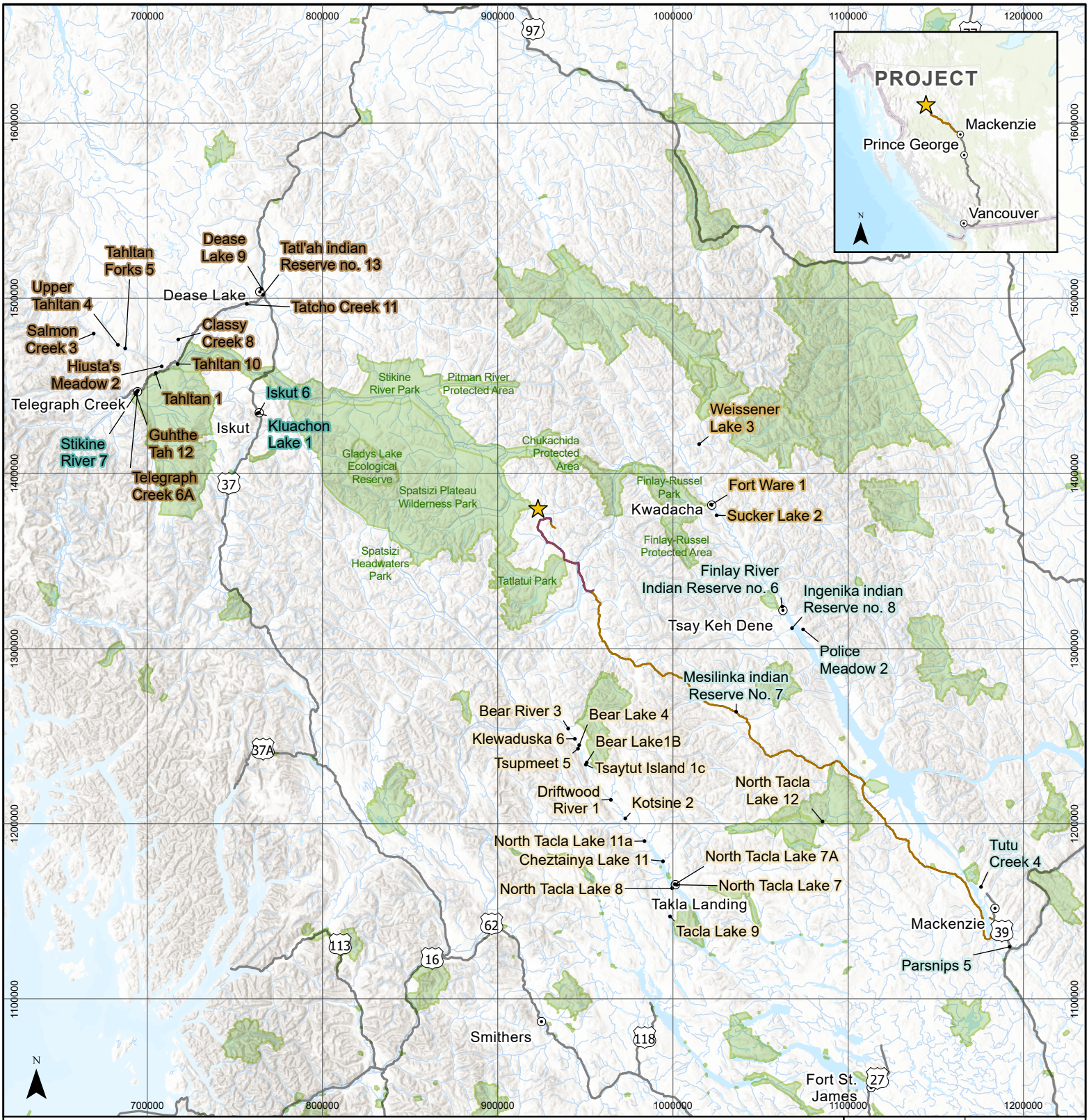

Legend

- Lawyers-Ranch Project
- Town and Community
- Highway
- Forest Service Road
- Potential Transmission Line Extension Corridor
- BC Parks

Indian Reserve by Indigenous Group

- Kwadacha Nation
- Tsay Keh Dene Nation
- Takla Nation
- Iskut Nation
- Tahltan Nation

North American Datum 1983
NAD 1983 BC Environment Albers

Map Center Coordinates: -127.21314° 57.13626°
Project Coordinates: -127.282014° 57.402529°
Project NTS Map: 94E
Scale: 1:3,000,000

Notes:
1. Basemap Data: GeoBC Data Distribution
2. Basemap: ESRI Topographic
3. Data supplied by Thesis Gold on 2025-01-16
4. Prepared by Chu Cho Environmental

0 60 120
Kilometres

Figure 3-2
Rev. 2

December 17, 2025

THESIS GOLD

Local Communities and Areas of Interest

Lawyers-Ranch Project
Initial Project Description

CHU CHO ENVIRONMENTAL one-eighty SLR

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The Project is proposed on provincial Crown lands. The Project will not be carried out on federal lands. The nearest federal lands are federal Indian Act Reserves; the nearest is located approximately 100 km from the Project. Thesis has not requested, nor has it received, federal funding for the Project as of the completion of this document.

The Project does not overlap with any provincial parks. The nearest park is the Spatsizi Plateau Wilderness Provincial Park. The shortest distance between the Project footprint (southern-most pit at the Ranch Site) and Spatsizi Plateau Wilderness Provincial Park (eastern edge) is approximately 1.5 km.

The nearest federal lands to the Project are Indian Reserves, as defined by the federal *Indian Act* (Reserve), Fort Ware 1 and Weissener Lake 3, belonging to Kwadacha Nation. They are both approximately 100 km away from the Project. Distances from the Project to relevant Reserves are summarized in Table 3-3 and represented spatially in Figure 3-2.

Table 3-3: Approximate Distance to Indian Reserves

Indigenous Group	Indian Reserve Name	Approximate Distance from Project (km)	
		By Road[1]	Straight Line
Kwadacha Nation	Fort Ware 1	534	99
	Sucker Lake 2	526	102
	Weissener Lake 3	588*	99
Tsay Keh Dene Nation	Finlay River 6	461	150
	Ingenika 8	461	160
	Mesilinka 7	207	162
	Parsnip 5	468*	368
	Police Meadow 2	494	167
	Tutu Creek 4	481	333
Takla Nation	Bear Lake (Fort Connolly) 4	752*	137
	Bear Lake (Tsaytut Bay) 1B	739*	148
	Bear Lake (Upper Driftwood River) 3	763*	127
	Cheztainya Lake 11	663	213
	Driftwood River (Kastberg Creek) 1	711*	171
	Klewaduska (Cataract) 6	754*	133
	Kotsine (Skutsil) 2	697*	184
	North Tacla Lake (North End Meadow) No. 11A	692	199
	North Tacla Lake (West Landing) 8	671*	230

Indigenous Group	Indian Reserve Name	Approximate Distance from Project (km)	
		By Road[1]	Straight Line
	North Tacla Lake 12	329*	242
	North Tacla Lake 7	647	229
	North Tacla Lake 7A	648	228
	Tacla Lake (Ferry Landing) 9	667	245
	Tsaytut Island 1C	741*	149
	Tsupmeet (Patcha Creek) 5	751*	139
Iskut Nation	Iskut 6	1,367	169
	Kluachon Lake 1	1,368	169
	Stikine River 7	1,563	239
Tahltan Nation	Classy Creek 8	1,514*	227
	Dease Lake 9	1,454	202
	Guhthe Tah 12	1,562	239
	Hiusta's Meadow 2	1,543	230
	Salmon Creek 3	1,602*	273
	Tahltan 1	1,542	231
	Tahltan 10	1,522	222
	Tahltan Forks 5	1,586*	253
	Tatcho Creek 11	1,462	203
	Tatl'ah Indian Reserve No. 13	1,452	199
	Telegraph Creek 6A	1,561	238
	Upper Tahltan 4	1,590*	258

Notes:

1. Distances marked by an asterisk (*) indicate that a Reserve is not fully accessible by road. These distances are approximate and may include a combination of road, rail, and straight-line measurements.
2. Takla Nation, as part of its review of the IPD and EP (Appendix F), shared that it is in ongoing settlement discussions with Canada that may result in the attribution of additional Reserves to Takla Nation.

[1] GeoBC (2017).

3.2.1 Land and Resource Management Areas

The Project does not fall within a municipality. The Project is within the Mackenzie Land and Resource Management Plan (LRMP) (BC Gov. 2000b) area and the Cassiar-Iskut-Stikine LRMP (BC Gov. 2000a). LRMPs provide strategic level direction for managing Crown land resources and identify ways to achieve community, economic, environmental, and social objectives.

The LRMP subzone crossed by the Project is the Toodoggone Lake/River – Special Subzone (#7B) of the Thutade – Mining and Wildlife Special Resource Management Zone (RMZ) #7. The intent of RMZ #7 is to prioritize mineral development and related access while managing the conservation of identified non-extractive values (e.g., wildlife and wildlife habitat).

The Cassiar-Iskut-Stikine LRMP subzones crossed by the Project are General Management Direction and Metsantan Zone, both of which allow for mineral development. The LRMP includes provisions for the Metsantan Zone related to the protection of cultural values and ecological integrity. It also includes access management to minimize disturbance to caribou migration.

In addition to the existing LRMPs, BC is currently undertaking new land use planning processes in collaboration with Indigenous Nations across northwest BC. These include the Kaska–BC Land Use Planning Project (KLUPP) process, which encompasses the Project area. The proposed Dene K'éh Kusān Indigenous Protected and Conserved Area, under consideration as part of the KLUPP process, does not intersect the Project area. The current timeframe for the completion of the KLUPP process is anticipated to take one year. During this period, Thesis will continue to monitor developments and participate, as appropriate.

Additionally, the Tahltan–BC Land Stewardship Planning Project applies to areas west of the Project, although it does not overlap with the Project footprint or the Thesis mineral tenures.

To date, no other regional district or Indigenous land use plans that apply to the Project have been identified. Thesis is also not aware of any rezoning or changes in land designations that would be required to construct and operate the Project.

3.3 Project History

The Project consists of two mineral exploration sites; the Lawyers and Ranch sites, both of which have a long history of mineral exploration. Gold and base metals were documented in the region as early as 1824, and early exploration efforts were first recorded in the 1960s. Exploration efforts on site confirmed the presence of economic mineral resources in the 1980s, leading to the development of the former Cheni Mine, operated by Cheni. The Cheni Mine included underground mining for high-grade gold and silver at the Lawyers Site, which operated between 1989 and 1992, and surface mining at the Ranch Site in 1991. Extensive exploratory drilling took place at the Ranch Site between 1982 and 2007 across 14 gold-mineralized zones.

Tailings from the former Cheni Mine were stored at a TMF located on the west bank of Attorney Creek. A TMF consists of a dam and a pipeline to transport tailings from the processing plant to the TSF. The historical TMF is approximately 700 metres (m) long and 330 m wide and covers an area of approximately 13 ha (Golder 2020). The Cheni Mine TMF was reclaimed in 1996 by placing a till cover over the tailings and regrading the crest and downstream face of the dam. Following the release of a portion of the security bond back to Cheni in 2002, the responsibility for the TMF was transitioned to the Ministry of Energy, Mines and Low Carbon Innovation (EMLI). Repair and upgrade of the spillway was conducted in 2019 (Golder 2020).

The mineral claims at the current Lawyers and Ranch sites have changed ownership and have been subject to a variety of exploration work over the years. Phoenix Precious Metals Corp. optioned the Lawyers Site claims to Crystal Exploration Inc. (renamed to Benchmark) in 2018, and in 2020, the Ranch Site claims were acquired by Thesis through an option agreement with Guardsmen Resources Inc. Thesis completed a merger with Benchmark on August 23, 2023, enabling the consolidation of the once separate Lawyers and Ranch projects. This consolidation enables shared infrastructure across the site and reduces the Project's overall disturbance footprint relative to having two separate projects with separate infrastructure (see Table 4-1).

There are no contaminated sites overlapping with the Project that are listed on the Contaminated Site Registry. According to iMapBC (BC Gov. 2025b), the nearest Environmental Remediation Site, or known and potentially contaminated property in BC, is off-property and approximately 20 km southeast of the Lawyers Site and has a Site ID of 27450 (East Side of Cheni Road).

Additional information about historical mineral exploration at the Project site can be found in the 2024 Preliminary Economic Assessment (PEA) (JDS 2024). Activities historically undertaken at the site include drilling, soil and rock sampling, and remote sensing. The Marmot and Silver Pond exploration areas, along with other areas, are included in the Summary of Historical Exploration and Ownership of the Lawyers Site (Table 6-1 of the PEA). The Project has not previously been proposed or submitted for EA approval.

3.4 Project Timing

Project planning and design will be iterative, with multiple opportunities for feedback from Indigenous Nations, the public, and government.

The current anticipated timing for the EA process is outlined in Table 3-4. This schedule follows the BC EA process and assumes a substituted federal review process (see Section 5.0 for more details). The high-level schedule presented in Table 3-4 is subject to change based on conversations and feedback from the EAO, IAAC, Indigenous Nations, and other stakeholders.

Table 3-4: Preliminary Environmental Assessment Phases Timing

Environmental Assessment Phases	Preliminary Timing
Early Engagement	Q4 2025-Q1 2026
Readiness Decision	Q1 2026-Q2 2026
Process Planning	Q2 2026-Q3 2026
Application Development and Review	Q3 2026-Q2 2028
Effects Assessment and Recommendation	Q3 2028-Q1 2029
Decision	Q1 2029
Post-Certificate	Q1 2029, onwards

The estimated durations of each anticipated Project phase are highlighted in Table 3-5, and will be further described and refined in the EA. Timing of initiation is subject to engagement and dependent on the duration of the EA process and the attainment of anticipated permits, licences, and approvals.

Table 3-5: Project Phases, Estimated Durations, and Preliminary Timing

Project Phases	Estimated Duration	Preliminary Timing
Construction – Early Works	Approximately 2 years	2029-2031
Construction – Development		
Operation	Approximately 14 to 20 years	2031 onward
Closure	Approximately 1 year after completion of mining activities.	To be determined
Post-Closure	Post-Closure will begin after Closure and will take place until permit requirements are met.	To be determined

3.5 Existing Permits, Licenses, and Approvals

The Project site contains historical mine workings associated with the former Cheni Mine, including a historical waste rock storage facility (WRSF) and TMF. The Project, as proposed in this IPD, will overlap with the historical mine workings and WRSF, but will not overlap or disturb the historical TMF. The care and maintenance of the historical WRSF and TMF at the Project site are the responsibility of the Ministry of Mining and Critical Minerals (MCM), formerly EMLI.

The permits listed below are currently active but may expire at some point during the EA and permitting processes. Amendments and new permits will be sought and attained, as required, prior to any relevant work being conducted.

The existing permits, licenses, and approvals that are relevant to the Project are summarized in Table 3-6.

Table 3-6: Existing Permits, Licenses, and Approvals

Act	Permit/Approval Type	Name/Permit or License Number	Notes
Mines Act	Exploration Permit	MX-13-100	Exploration activities at the Lawyers Site are permitted under Mineral Exploration Permit MX-13-100, which was initially issued to Guardsmen Resources Inc. in 2003, transferred to Phoenix Precious Metals in 2011, and transferred to Benchmark (now Thesis) in 2018.
Mines Act	Exploration Permit	MX-100000113	Exploration activities at the Ranch Site are permitted under Mineral Exploration Permit MX-100000113, which was issued to Thesis in 2021.
Water Sustainability Act	Water License	Conditional Water License 506026	Active water license held for the Lawyers Site under the *Water Sustainability Act*.
Water Sustainability Act	Water License	Conditional Water License 506288	Active water license held for the Ranch Site under the *Water Sustainability Act*.
Park Act	Park Use Permit	111727	Authorization to conduct aquatic studies within the Spatsizi Plateau Wilderness Provincial Park.
Forest Act	Occupant License to Cut	L52070	Authorization to cut and remove Crown timber as required to facilitate operations within the license area.
Forest Act	Special Use Permit	SP0007	Authorization to use a portion of Crown land for the purposes of construction and maintenance of a road.
Heritage Conservation Act	Heritage Inspection Permit	2024-0197	Authorization to conduct an Archaeological Impact Assessment (AIA). If an archaeological or heritage site is found and cannot be avoided, Thesis would obtain a Site Alteration Permit under the *Heritage Conservation Act*.

Source: JDS (2024).

4.0 Project Description

This section of the IPD outlines the proposed Project design, planning approach, components, and activities, as well as associated water requirements, emissions, discharges, and wastes. It also describes the assessment of alternatives to the Project and alternative means of carrying it out, along with ongoing work to be completed through the EA process.

4.1 Project Design and Planning

Project planning and design is an iterative process that is informed by technical design considerations and ongoing engagement with Indigenous Nations – enabling Thesis to integrate Indigenous perspectives and environmental, social, and economic factors into Project development.

Thesis' project design process includes milestone documents that evaluate the Project from a technical and economic lens. Each milestone document will further refine the design and level of Project detail presented in the previous document. This staged approach to project development typically involves the preparation of the following reports:

- **PEA**: A scoping study that provides a high-level snapshot of the Project's economic potential and preliminary engineering requirements to determine if further study is warranted.
- **Pre-Feasibility Study (PFS)**: A more advanced study with moderate-level engineering detail that determines whether the Project is likely to be technically and economically viable.
- **Feasibility Study (FS)**: The most advanced study that requires detailed engineering and planning and is used to support major financing decisions with respect to mine development.

The Project is near the end of the PFS stage, with FS-level work planned to take place beginning in 2026. The Project's design will continue to be refined through the FS, additional technical studies, existing conditions studies, and the EA, after which the most detailed design work will take place. The Project will meet Technology Readiness Level 7 requirements for the Application for an Environmental Assessment Certificate.

The Project PEA was completed in 2022 and was informed by Indigenous collaboration and data available at the time of writing. Thesis consolidated the Lawyers and Ranch projects into one project in August 2023 and an updated PEA was produced in 2024. The 2024 PEA included a modified design, which consolidated the Project footprint across the Lawyers and Ranch sites and incorporated additional siting and mine component changes to reduce the overall environmental disturbance. A summary of how Indigenous collaboration has informed Project design and execution is provided in Section 6.1.

The 2024 PEA was further informed by additional information gathered from continued exploration of the sites since 2018 (including rock sampling, biogeochemical sampling, prospecting and mapping, petrographic studies, and remote sensing surveys and analysis), environmental and existing conditions studies (see Section 8.0 Existing Environmental Setting), and mine planning. The 2024 PEA is available on the Project website (JDS 2024).

The Project design advanced to a PFS-level throughout 2025, and a final technical report on this work is expected early in 2026. Changes to Project design between the 2024 PEA and 2025 PFS are based on additional engineering investigations, environmental studies, and feedback from additional Thesis-led collaboration and engagement with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation in Q2 2025. Project design will further be informed by ongoing existing conditions data collection, and feedback gathered through ongoing Indigenous engagement through the EA process. This information will be considered throughout an upcoming Feasibility Study.

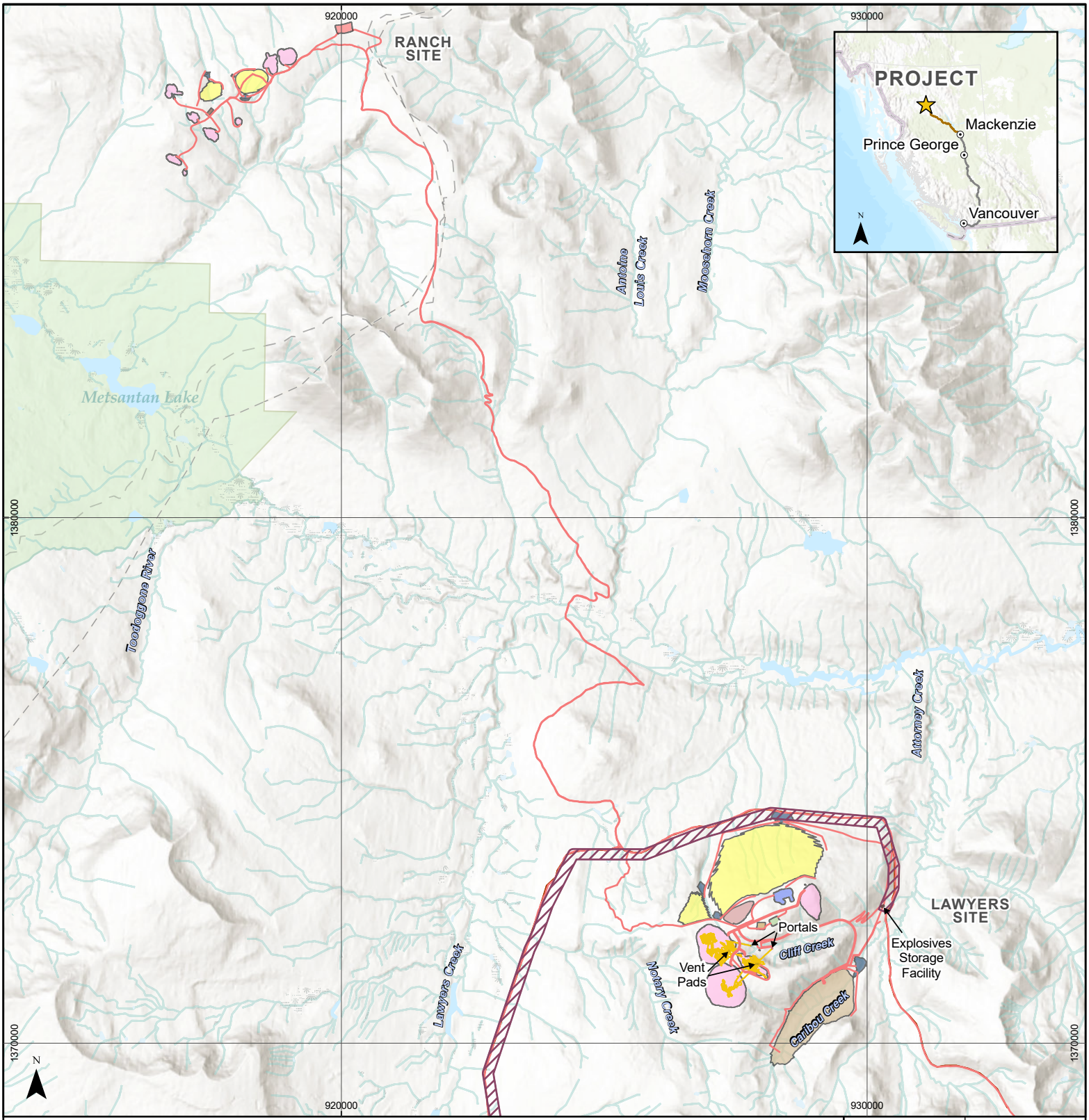
4.2 Proposed Project Components

The proposed Project components include underground and OP mining facilities and infrastructure, including vent pads and open pit areas, an OPP, a TMF, four WRSFs, a high-grade stockpile, an accommodations complex, a transmission line extension connecting the Project to the existing Kemess Mine transmission line, waste management facilities, and facilities that support operation and maintenance of Project activities (ancillary facilities). The Project components are summarized in Table 4-1, which also indicates whether the Project component is an existing component that may be modified or if it is a new component to be constructed. An overview of the Lawyers and Ranch sites, including the access roads is provided in Figure 4-4, and an overview of the potential transmission line extension corridor is provided in Figure 4-2. The preliminary Project layout for the Lawyers and Ranch sites are provided in Figure 4-3 and Figure 4-4, respectively.

Table 4-1: Proposed Project Components

Proposed Project Components	Lawyers	Ranch	Details/Description
Underground Mining Area and Infrastructure	New	Not applicable	Will be in place where targeted underground mining will occur to extract high-grade ore. Underground Infrastructure: • Portals provide access to underground workings. • Transfer pads will be used to transfer material from underground trucks to haul trucks. • Underground workings include tunnels, excavations, shafts, and declines.
Vent Pads	New	Not applicable	Vent pads are where underground vent raises interface with the surface. Vent pads will be in place at surface, for ventilation of the underground mining areas.
Lawyers Site Open Pit (OP) Area	New	Not applicable	Will be in place where targeted OP mining will occur at the Lawyers Site to extract ore.
Ranch Site OP Area	Not applicable	Existing/modified New	Will be in place where targeted OP mining will occur at the Ranch Site to extract ore. Areas that were previously excavated from historical mining activities may be revisited.
Ore Processing Plant (OPP)	New	Not applicable	The OPP consists of the mill and supporting facilities. Mined material will be transported to the OPP, where it will be processed and refined, producing doré and concentrate.
Waste Rock Storage Facility (WRSF)	New	New	Waste rock will be stored near the OP areas at both the Lawyers and Ranch sites in two new WRSFs at each site.
Tailings Management Facility (TMF)	New	Not applicable	Tailings are a byproduct of mineral processing. The TMF consists of a tailing storage facility (TSF) (including a dam), and pipelines; one pipeline to transport tailings from the processing plant to the TSF, and one water reclaim pipeline that will be used to recycle water for processing.
Power supply	Existing/modified and new	Existing/modified New	The Lawyers Site is planned to be powered by hydro-electric power and will use diesel generators for emergency backup power. The new transmission line extension will connect from the existing transmission line that currently provides power to the Kemess Mine. The transmission line route is expected to generally follow an existing road. Current start and end coordinates for the transmission line are: • Start (Kemess): 126.7472°W 56.9879°N • End (Lawyers): 127.1587°W 57.3363°N A new substation will be constructed. The projected power demand, source/connection concept, and design related to the transmission line route continue to advance. Additional details will be included in future Project deliverables, as appropriate, including the Environmental Assessment Certificate (EAC) Application. The Lawyers Site may be powered by diesel generators as primary power source, should the hydro line not prove feasible. The Ranch Site will be powered by diesel generators. The proposed transmission line extension corridor will connect from the existing transmission line that currently provides power to the Kemess Mine. The transmission line route is expected to be inside a corridor that generally follows an existing road. Detailed route refinements are expected to be within the corridor, and will consider location of environmentally sensitive features, input from Indigenous Nations and relevant regulatory authorities, as well as technical requirements for transmission line infrastructure. It is expected that the transmission line route is approximately 70 km in length will require an approximate 40 m wide right-of-way.
Accommodations Complex	New	Not applicable	The accommodations complex is anticipated to house approximately 500+ workers, and include the following facilities: • Kitchen and food storage • Dining room • Arrivals/departures building, including reception and first aid • Recreation facilities and gymnasium • Utility rooms (mechanical, electrical, domestic potable/hot water, fire protection) • Laundry • IT/server room • Potable water treatment plan

Proposed Project Components	Lawyers	Ranch	Details/Description
Site access and onsite roads	Existing/ modified new	Existing/ modified new	The Project will use the existing Sturdee Airstrip and road infrastructure for access. Several other exploration companies in the area are currently using this airstrip. The Project is accessible by following a network of existing Forestry Service Roads (FSR) that begin south of the Municipality of Mackenzie, BC, just off Highway 97, including: • Finlay FSR • Finlay-Osilinka FSR • Tenakihi FSR (Thutade FSR) • Omineca Resource Access Road or "Kemess Road." Vehicle access to the Project, including both the Lawyers and Ranch sites, will be routed through the existing Ring Road (part of the gravel Cheni Road). The Lawyers and Ranch sites are connected by the 28 km Ranch Road. Existing roads on site will be utilized to the extent feasible, and additional roads will be required to be built to access certain areas. Road work is expected to involve: • Upgrades to approximately 29 km of existing roads; and • Constructing approximately 15 km of new haul roads.
Water supply for mining and processing activities	New	New	Precipitation and runoff from active areas will supply water for mining and ore processing through the construction of collection and diversion channels. Groundwater wells will be installed at both the Lawyers and Ranch sites to supply additional water. Water used for processing will be recycled, where possible.
Water Management Pond	New	New	The water management ponds will hold water, prior to recycling, release or treatment.
Water Treatment Plant	Not applicable	New	The water treatment plant will treat contact water, prior to release.
Onsite waste and recycling management facilities	New	Not applicable	Waste and recycling storage/transfer facilities will be used for temporary waste and recycling storage before they are transferred offsite. Some domestic and organic waste will be incinerated onsite. Hazardous waste will be transported offsite to an approved facility. Inert waste, including equipment drained of all oils and hazardous materials, will be landfilled on site.
Bulk fuel storage and distribution	New	Not applicable	There will be several double-walled diesel storage tanks and a dispensing station for the mine mobile equipment fleet. The tanks will be located near the mine maintenance facility. The facility will be complete with requisite spill storage capacity and will meet fuel storage requirements.
Explosives storage facility	New	Not applicable	Explosives that will be used to facilitate mining activities will be managed and stored onsite according to applicable regulatory requirements and best practices.
Ancillary facilities	New	Not applicable	Ancillary facilities include: • Gateway house • Offices and mine dry facility • Maintenance facilities and laydown areas • Assay Laboratory • Warehousing facilities for the mine and mill • Emergency response and training facility • IT and communications infrastructure • Fire water distribution and fire detection systems • Paste Plant (produces cement mixture used to backfill underground workings) • Temporary concrete batch plant for construction
High Grade Stockpile	New	Not applicable	A stockpile to temporarily store high-grade ore prior to processing.
Ore Stockpile Pad	Not applicable	New	A lined pad placed at Ranch needed for the temporary placement of ore prior to processing.



Legend

- Access Road
- Existing Transmission Line
- Forest Service Road
- Underground Mining Area
- Open Pit Areas
- Ore Processing Plant
- Waste Rock Storage Facility
- Tailings Management Facility
- Potential Transmission Line Extension Corridor
- Accomodations Complex
- Water Management Pond
- Water Treatment Plant
- Ore Stockpile Pad
- Ancillary Facilities
- High Grade Stockpile

North American Datum 1983
NAD 1983 BC Environment Albers

Map Center Coordinates: -127.26808° 57.39513°
Project Coordinates: -127.282014° 57.402529°
Project NTS Map: 94E
Scale: 1:100,000

Source Notes:
1. Basemap Data: GeoBC Data Distribution
2. Basemap: ESRI Topographic
3. Data supplied by Thesis Gold on 2025-01-16
4. Prepared by Chu Cho Environmental

0 2 4
Kilometres

Figure 4-1
Rev. 2

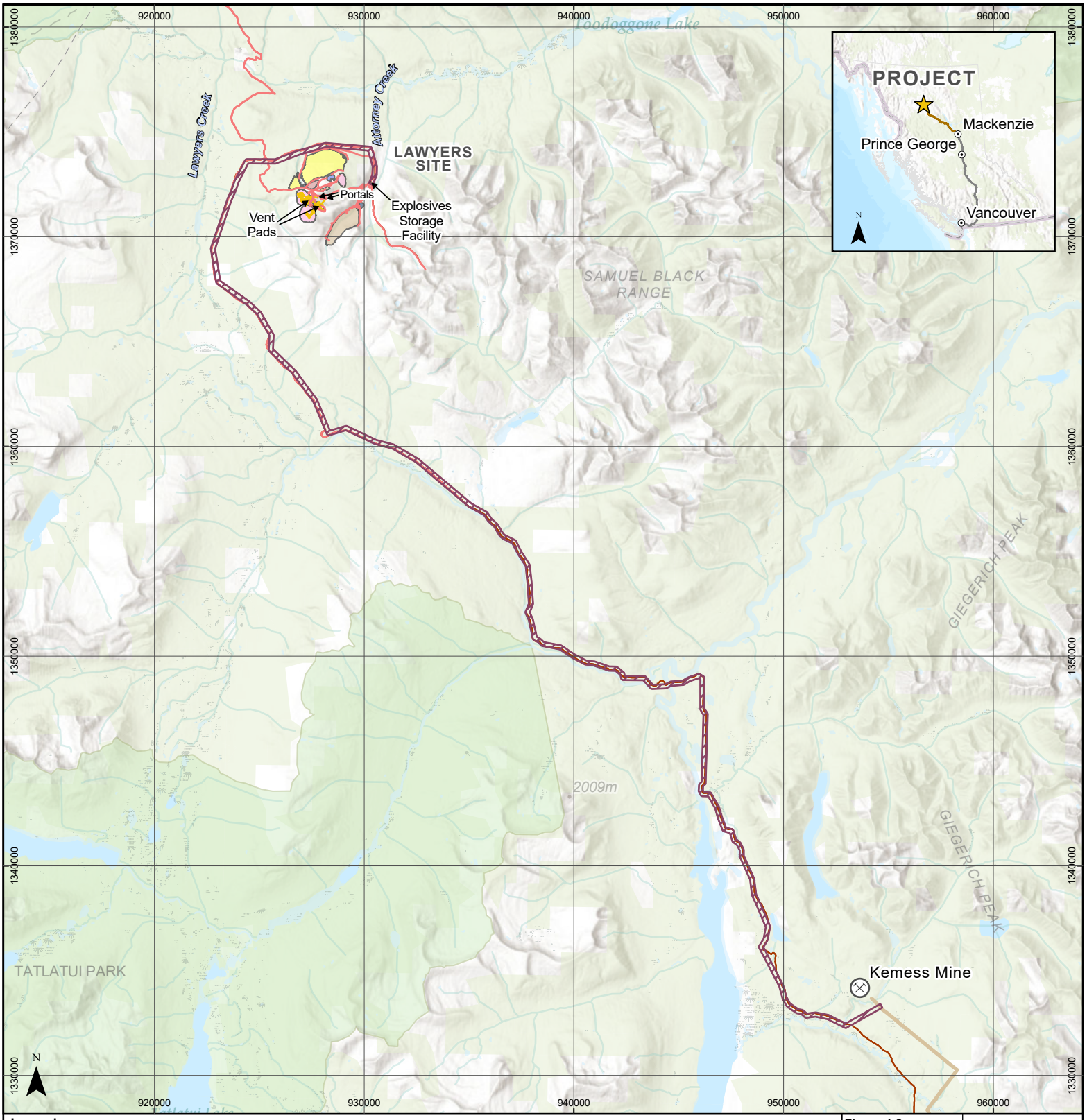
December 17, 2025

THESIS GOLD

Project Overview: Lawyers and Ranch Sites

Lawyers-Ranch Project
Initial Project Description

CHU CHO ENVIRONMENTAL one-eighty SLR



Legend

- Kemess Mine
- Access Road
- Existing Transmission Line
- Forest Service Road
- Underground Mining Area
- Open Pit Areas
- Ore Processing Plant
- Waste Rock Storage Facility
- Tailings Management Facility
- Potential Transmission Line Extension Corridor
- Accomodations Complex
- Water Management Pond
- Ancillary Facilities
- High Grade Stockpile

North American Datum 1983
NAD 1983 BC Environment Albers

Map Center Coordinates: -127.01792° 57.17706°
Project Coordinates: -127.282014° 57.402529°
Project NTS Map: 94E
Scale: 1:250,000

Source Notes:
1. Basemap Data: GeoBC Data Distribution
2. Basemap: ESRI Topographic
3. Data supplied by Thesis Gold on 2025-01-16
4. Prepared by Chu Cho Environmental

0 5 10
Kilometres

Figure 4-2
Rev. 2

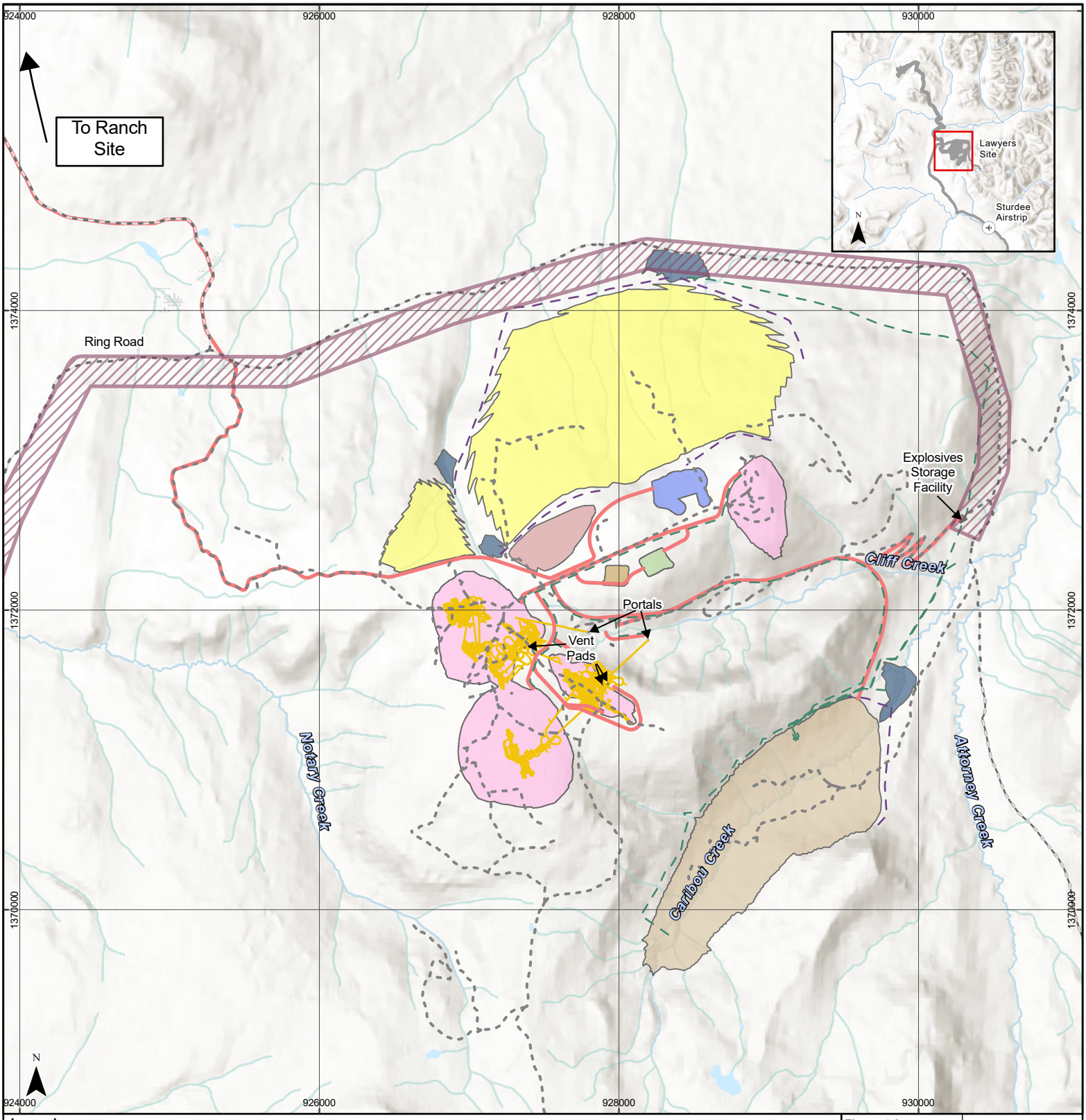
December 17, 2025

THESIS GOLD

Project Overview: Potential Transmission Line Extension Corridor

Lawyers-Ranch Project
Initial Project Description

CHU CHO ENVIRONMENTAL one-eighty SLR



Legend

- Existing Access Road
- Existing Roads
- Watercourse
- Collection and Diversion Channel
- Pipeline
- Access Road
- Underground Mining Area
- Open Pit Areas
- Ore Processing Plant
- Waste Rock Storage Facility
- Tailings Management Facility
- Potential Transmission Line Extension Corridor
- Accomodations Complex
- Water Management Pond
- Ancillary Facilities
- High Grade Stockpile

North American Datum 1983
NAD 1983 BC Environment Albers

Map Center Coordinates: -127.20567° 57.33435°
Project Coordinates: -127.282014° 57.402529°
Project NTS Map: 94E
Scale: 1:35,000

Source Notes:
1. Basemap Data: GeoBC Data Distribution
2. Basemap: ESRI Topographic
3. Data supplied by Thesis Gold on 2025-01-16
4. Prepared by Chu Cho Environmental

0 0.5 1 1.5
Kilometres

Figure 4-3
Rev. 2

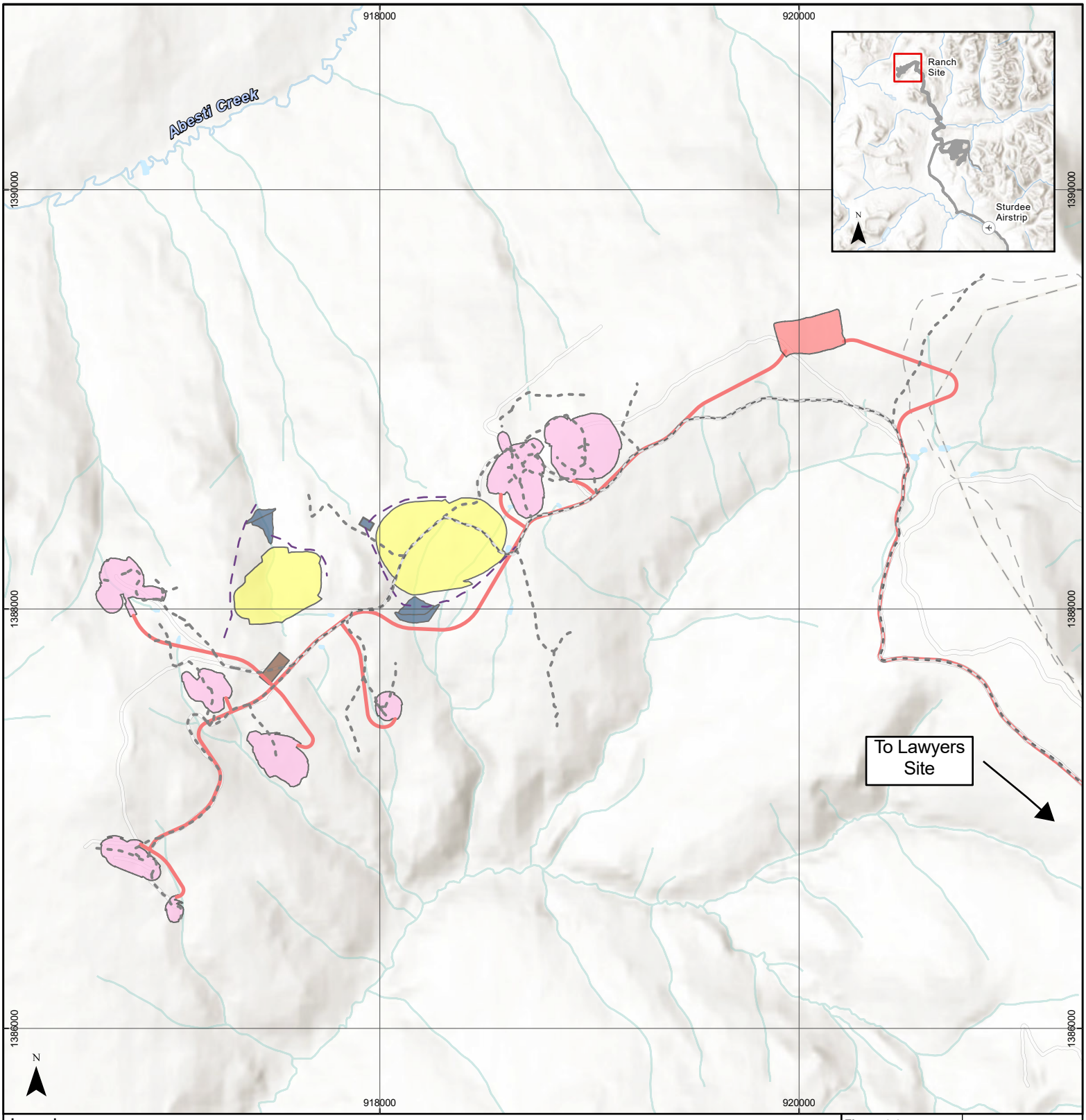
December 17, 2025

THESIS GOLD

Project Layout - Lawyers Site

Lawyers-Ranch Project
Initial Project Description

CHU CHO ENVIRONMENTAL one-eighty SLR



Legend

- Existing Access Road
- Existing Roads
- Watercourse
- Collection and Diversion Channel
- Access Road
- Open Pit Areas
- Waste Rock Storage Facility
- Water Management Pond
- Water Treatment Plant
- Ore Stockpile Pad

North American Datum 1983
NAD 1983 BC Environment Albers

Map Center Coordinates: -127.35561° 57.47547°
Project Coordinates: -127.282014° 57.402529°
Project NTS Map: 94E
Scale: 1:25,000

Source Notes:
1. Basemap Data: GeoBC Data Distribution
2. Basemap: ESRI Topographic
3. Data supplied by Thesis Gold on 2025-01-16
4. Prepared by Chu Cho Environmental

0 0.5 1
Kilometres

Figure 4-4
Rev. 2

December 17, 2025

THESIS GOLD

Project Layout - Ranch Site

Lawyers-Ranch Project
Initial Project Description

CHU CHO ENVIRONMENTAL one-eighty SLR

4.3 Project Phases and Activities

The Project is proposed to be carried out over four phases: construction, operation, closure, and post-closure. For the purposes of this document, the closure and post-closure phases will be discussed together. The Project phases are defined as follows:

- **Construction**: Implemented as a staged approach, consisting of early works and development construction phases, including construction of the OPP and mining infrastructure such as portals, transfer pads, and underground workings. The estimated duration is approximately 2 years.
- **Operation**: Underground and OP mining methods will be used to extract ore. Estimated duration of approximately 14 to 20 years.
- **Closure and Post-Closure:** implemented as a staged approach, consisting of closure and post-closure.
    - **Closure:** Closure works include decommissioning buildings and infrastructure, hauling materials off site, and reclaiming disturbed areas, to the extent practicable. Closure is anticipated to take about one year after mining activities have been completed.
    - **Post-Closure**: Post-closure will begin after closure and will take place until permit requirements are met.

An overview of the timing and activities during each Project phase is provided in Table 4-2. Each Project phase is explained in further detail in the following sections.

Table 4-2: Summary of Activities by Project Phase

Project Phase	Stage	Activities
Construction (approximately 2 years)	Early Works	• Reactivation and upgrades of onsite road network, and construction of new road. • Construction of accommodation complex. • Clearing and grubbing. • Stripping and stockpiling of topsoil. • Earthworks, pads, and laydowns. • Construction and installation of transmission line extension, including clearing the corridor, installing poles, and stringing conductors. • Construction of ancillary facilities, including onsite utilities and services.
	Development Construction	Construction of: • Ore Processing Plant (OPP). • Portals and transfer pads. • Underground workings (i.e., tunnels, excavations, shafts, and decline to underground mine). • Pre-stripping of Open Pit (OP) areas. • Tailings Storage Facility (TSF) starter dam. • Waste rock storage facility (WRSF).
Operation (approximately 14 to 20 years)	Operations	• Underground and OP mining (occurring simultaneously, including blasting, excavation). • Establishment of high-grade stockpiles • Road upgrades, as needed, to accommodate haul trucks. • Ore processing activities. • TSF dam raises. • Transportation and hauling ore onsite. • Transportation of doré and concentrate offsite. • Operation of TMF and WRSFs. • Ancillary facilities (see Table 7-1). • Operational closure/progressive reclamation. • Water treatment and management.

Project Phase	Stage	Activities
Closure	Closure and Reclamation	• Managing waste, including transporting waste from site. • Dismantling and disposing of structures and equipment, including utilities. • Decommissioning pit pumping systems. • Long-term stabilization of exposed erodible materials. • Backfilling, re-sloping, scarifying, and revegetating decommissioned areas to perpetuate a long-term revegetated state. • Regrating of access roads, ponds, ditches, and borrow areas not required beyond mine closure.
Post-Closure	Post-Closure (Will continue until permit conditions are met)	• Monitoring of decommissioned infrastructure (e.g., WRSFs, TSF). • Long-term monitoring.

4.3.1 Construction Phase

As described in Table 4-2, the construction phase will be staged and will consist of two distinct working stages with a combined duration of approximately two years. Known seasonal timing constraints, including sensitive windows and periods, for migratory birds, fish, and other wildlife will be factored into the development of the detailed construction schedule and considered in the Environmental Assessment Certificate (EAC) Application. For example, at the Project site, the bird nesting window is from March 31 to August 1, and the fish spawning window is generally from June 1 to September 30. The caribou cautionary period is September 15 to January 14, and the caribou critical period is January 15 to July 15. Seasonal timing constraints will be used and be specific to individual species identified, as appropriate.

The transportation route outlined in Figure 4-3 (site access and onsite roads) and the existing Sturdee Airstrip will be used to transport supplies and personnel to and from site to facilitate activities during the construction phase.

4.3.1.1 Early Works Stage

The early works stage of construction includes activities required to enable the construction of the Project, the start of which may be contingent on permitting status.

Key early works activities will include:

- Preparatory work (clearing and grubbing, earthworks, laydowns) for the development construction stage.
- Construction of the accommodations complex and ancillary facilities (facilities that will support the main operation of the Project, including utilities and services such as water supply and treatment, maintenance, and power supply facilities).
- Building the transmission line extension to the Project to secure the main power source.
- Reactivation of access roads and road upgrades, as needed.

4.3.1.2 Development Construction Stage

The development construction stage is defined by the construction of the OPP and will occur over the course of approximately two years. During this stage:

- The initial TSF dam (starter dam) will be built using materials from pre-stripping the OP areas.
- Stripping of surface layers (topsoil, vegetation, and rock) will take place.
- Material that can be used later to support Project activities and reclamation will be stockpiled for future use.
- The network of onsite roads will be upgraded to facilitate Project activities.

Key mining infrastructure for underground mining such as portals, transfer pads, and underground workings will be built sometime between the construction phase and early operations phase. Workforce estimates for the construction phase are currently being developed and refined.

4.3.2 Operation Phase

The operation phase is estimated to last between 14 to 20 years. The operational timeline of the Project is dependent on a variety of factors, including further development of the mine plan, engineering, project economics, and the price of gold/silver.

During the operation phase, both underground and OP mining methods will be used to extract ore:

- Underground mining methods will be used to target deeper, higher-grade ore at the Lawyers Site.
- OP mining will be used for the majority of the Project's mineral deposits.

The primary underground method will be long hole stoping, where long holes are drilled to access specific parts of a mineral deposit, the controlled use of explosives breaks up the ore at the bottom of the stope, and the blasted ore is extracted.

Operational activities will be planned and conducted in accordance with the *Mines Act* and its associated regulations, including the Heath, Safety and Reclamation Code of Mines in British Columbia.

Mining will take place year-round on a 24-hour per day, 7 days per week, 365 days per year schedule, with personnel working 12-hour shifts. Positions in the following areas are required for the operation phase:

- Underground mining
- OP Mining
- Process Plant
- General and Administrative.

The annual average number of personnel for the operation phase is currently estimated to be more than 500. The types of onsite positions required for the Project's operation phase are summarized in Table 3-1.

Mining activities that include the transportation of materials are planned to be facilitated by an owner-operated fleet. Mined ore will be transported to the OPP, where it will be processed or stockpiled for later. Implementation of the conventional process of crushing, grinding, flotation, thickening, leaching, counter current decantation, Merrill Crowe, and cyanide neutralization is anticipated in the OPP.

The OPP will produce predominantly doré, as well as concentrate. Ore will be processed at an annual average rate of 5.1 Mtpa, or an average of 13,700 tonnes per day (tpd). The maximum annual throughput is estimated to be approximately 5.5 Mtpa. With the implementation of design features, the OPP would have the capacity to handle a maximum of 15,000 tpd of processed ore. Mining and mineral processing will produce both waste rock and tailings. Waste rock produced from the extraction process will be hauled either to the TSF, to be used as part of the containment structure, or to the WRSFs. Sequencing details related to the handling of waste rock will be refined in the mine plan. Some initial geochemical analysis has indicated that there may be some long-lag potentially acid generating material.

Additional analysis has been initiated and geochemistry and source-term data continues to be collected and will be incorporated into waste rock and water quality modeling as the EA advances. Tailings produced from ore processing will be deposited directly into the TMF from the OPP. The dam of the TMF will be strategically raised throughout the operation phase to increase storage capacity in a cost-effective and safe manner.

Doré and concentrate will be sold and shipped internationally. Transport of products off site will include a combination of air and ground transportation. The transportation route outlined in Figure 4-3 and the Sturdee Airstrip will be used to transport supplies and personnel to and from site during operations, while details on the transportation methods and frequency for operations have not yet been determined. Mined materials will be hauled between Project sites using onsite roads, and the final transportation methods and routes will be defined as Project planning advances. Road traffic associated with the transport of doré and concentrate from the Project area will be reviewed in future phases. It is expected the Project will produce predominantly doré which will have an immaterial impact on road traffic. Concentrate shipments, which would predominantly occur in years 1-3 of the operation phase, would potentially increase road traffic during these years. The amount of expected concentrate production in years 1 to 3 is still being assessed.

The network of existing onsite roads will be maintained and upgraded as needed to facilitate Project activities.

Ancillary activities, including site utilities and services, water management, waste management, and environmental monitoring, will take place throughout the operation phase to support the main operations of the Project (mining and processing).

Progressive reclamation facilitates a more efficient and effective active closure phase. Progressive closure and reclamation work has been implemented throughout the Project's exploration activities and will continue to take place where certain areas that are no longer needed for Project activities are reclaimed during the operation phase.

4.3.3 Closure and Post-Closure Phase

The closure and post-closure phase has two stages: the closure and reclamation stage and the post-closure stage.

4.3.3.1 Closure and Reclamation Stage

Closure and reclamation activities will be carried out pursuant to a future *Mines Act* permit (issued following Project approval) and informed by Thesis' collaboration and engagement with Indigenous Nations. Thesis will develop a Mine Plan and Reclamation Plan that requires a "Mine Plan and Reclamation Program Update," submitted to the MCM at least every five years, as stipulated by the Health, Safety and Reclamation Code for Mines in BC (BC Gov. 2024a).

Closure activities include the decommissioning of buildings and infrastructure and hauling of materials to an acceptable waste facility off site. These activities are anticipated to be completed one year after mining activities have completed.

Reclamation activities include the long-term stabilization of exposed erodible material, backfilling, re-sloping, scarifying, and revegetation of decommissioned areas to perpetuate a long-term revegetated state.

4.3.3.2 Post-Closure Stage Activities

Post-closure is the end goal of reclamation and represents a state in which the mine has met all permit obligations under the *Mines Act* and the mineral claims have reverted to the provincial government. This stage, called abandonment, occurs once reclamation is complete, no further active management or monitoring is needed, and reclamation bonds are returned to the operator.

The post-closure process confirms reclamation success. Prior to reaching post-closure, sites typically undergo care and maintenance, during which ongoing monitoring and management activities are carried out, including maintenance of water management infrastructure and long-term monitoring of surface water and groundwater.

4.4 Water Requirements and Management

Thesis is undertaking detailed studies to assess potential Project effects to surface and groundwater. Ongoing studies have been planned and conducted in collaboration with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation. Preliminary results have informed planning for water management in a way that prioritizes the efficient use of water, minimizes environmental impacts, and considers climate resilience.

Water for the Project will be supplied by a combination of surface water and groundwater. Water for construction and operations will be supplied by collecting runoff from Project areas, including water collected in the OPs.

Contact water will be collected and used where possible for Project activities. Work is ongoing to evaluate various water management and water treatment options for both contact and non-contact water. The results of ongoing data analysis and water quality modelling will inform the appropriate level of treatment in each case and will be presented in the EAC.

Non-contact water will be diverted via ditches constructed around the Project components such as the WRSFs and the TMF.

Groundwater wells will be installed to provide a supplemental water source and will be used if needed to contribute to a steady, reliable water source for the Project. Process water will be reclaimed and recycled and used in the OPP.

An estimate of the Project's anticipated water needs during operations is provided in Table 4-3.

Table 4-3: Estimated Project Water Usage During Operations

Project Activity	Estimated Water Usage (cubic metres per day [m^3/day])
Processing	24
Worker accommodations complex	75
Dust suppression	95
Total water usage per day	455 = 166,075 cubic metres per year (m^3/year)
Source: JDS (2024).	

4.5 Emissions, Discharges, and Waste

This section provides a summary of the anticipated emissions, discharges, and waste that may be generated by the Project, at a level of detail appropriate for this phase of the Project. As the Project advances, and in support of the EA process, studies will determine whether emissions are anticipated to be compliant with provincial or national standards.

4.5.1 Air and Dust Emissions

The Project is expected to create emissions resulting from Project-related vehicles, machinery and equipment use, and waste incinerators, as well as dust.

Potential sources of dust and particulate matter include mining, mineral processing, and traffic on gravel and dirt roads and other transportation routes associated with concentrate transport. Potential air and dust emissions will be considered in the EAC Application, and mitigation measures will be identified as appropriate to reduce potential effects.

4.5.2 Greenhouse Gas Emissions

Canada's Emissions Reduction Plan, along with BC's Clean BC Initiative and the *Climate Change Accountability Act*, aim to reduce greenhouse gas (GHG) emissions that drive climate change.

Projects that have the potential to emit over 10,000 tonnes of carbon dioxide equivalent (tCO_2e) annually are required to develop a net-zero emissions plan by 2050 as part of the EAC Application.

Key decisions during early Project design have been made to reduce overall GHG emissions attributed to the Project, including:

- Consolidation of the Lawyers Project and Ranch Project into a single Project, reducing duplication of Project components such as the OPP and TMF;
- Strategic siting of Project components, reducing commuting and hauling distances; and
- Use of BC Hydro grid power.

As the Project advances, opportunities to reduce GHG emissions will continue to be evaluated, including during the assessment and consideration of best available technologies during the EA.

Net GHG emissions consider both Project emissions and GHG removals. The GHG emissions estimate presented in Table 4-4 below was calculated as the Project's net GHG emissions (ECCC 2020; Equation 1):

$$\begin{aligned} &Net\ GHG\ emissions \\ &= Direct\ GHG\ emissions + Acquired\ GHG\ emissions \\ &- Avoided\ domestic\ GHG\ Emissions - Offset\ measures \end{aligned}$$

Expected sources of direct GHG emissions (Scope 1) for the Project include:

- Combustion of diesel fuel in:
  - Vehicles and equipment during the construction and post-operation phases; and

  - Vehicles and mining equipment during the operation phase.
- Use of emulsion explosives during the operation phase.
- Land-use changes during the construction and operation phases, which may result in the release of stored carbon dioxide (CO_2), which is expected to be roughly offset by CO_2 uptake after land reclamation.

Expected sources of acquired-energy-GHG emissions (Scope 2) for the Project are expected to occur from electricity use, primarily for the mill during the operation phase.

It should be noted that the Project is not currently expected to result in domestic GHG emissions; therefore, GHG offset measures have not yet been considered.

When applied to the Project, the preliminary GHG emissions estimate for the Project was calculated as follows:

$$Project\ Net\ GHG\ emissions = Combusion\ of\ diesel\ fuel + Use\ of\ emulsion\ explosives + land\ use\ changes + electrictiy\ use$$

The GHG emissions estimate in tCO2e by Project source and phase is presented in Table 4-4.

Table 4-4: GHG Emissions Estimate in tCO2e by Source and Project Phase

Project Phase	Year	Electricity	Diesel	Explosives	Land-Use Change*	Total
Construction	1	0	6,831	204	49,633	56,668
	2	0	6,831	204	49,633	56,668
Operation	1	1,855	34,618	1,080	0	37,553
	2	1,855	35,365	1,077	0	38,297
	3	1,855	32,599	1,117	0	35,572
	4	1,855	32,731	1,095	0	35,682
	5	1,855	34,240	1,165	0	37,260
	6	1,855	45,603	1,485	0	48,943
	7	1,855	45,101	1,559	0	48,516
	8	1,855	42,369	1,558	0	45,783
	9	1,855	43,404	1,558	0	46,817
	10	1,855	47,937	1,557	0	51,350
	11	1,855	45,699	1,525	0	49,079
	12	1,855	36,303	1,087	0	39,246
	13	1,855	37,184	1,045	0	40,084
	14	1,855	24,585	577	0	27,017
Closure (Post-Operation)	15	0	4,507	0	0	4,507
Total		25,975	555,907	17,894	99,266	699,041

Source: RWDI (2025).

* Land-use changes during the construction and operation phases will cause the release of stored carbon dioxide (CO_2), which is expected to be roughly offset by CO_2 uptake after land reclamation.

Net GHG emissions during the construction phase are estimated to be roughly 113 kilo tonnes of carbon dioxide equivalent ($ktCO_2e$), primarily attributed to direct emissions from land-use changes, which are estimated to be roughly 99 $ktCO_2e$, based on default values for regional land-use characteristics.

These projected emissions are assumed to occur during Project construction and are not offset by subsequent rehabilitation. Once more detailed information becomes available on the progression of Project construction, operation, and post-operation, refined estimates will be made available, based on the timing of GHG releases and carbon uptake starting with progressive reclamation. The remaining 14 $ktCO_2e$ of estimated construction emissions are attributed to diesel combustion from construction vehicles and equipment.

Using a 14-to-20-year operation phase, the preliminary GHG emissions estimate for the Project is 581 $ktCO_2e$. These GHG emissions are primarily attributed to diesel combustion from vehicles and mining equipment (538 $ktCO_2e$), indirect emissions from electricity usage at the mill (26 $ktCO_2e$), and emissions from explosives (17 $ktCO_2e$).

Land disturbance during the construction and operation phases may temporarily change the ability of some land classifications, typically forests and wetlands, to act as carbon sinks, potentially resulting in lost carbon uptake. A qualitative description of the activities that might affect carbon sinks during the construction and operation phases of the Project will be further developed as the Project progresses through the EA and permitting processes.

4.5.3 Noise Emissions

Certain Project activities (e.g., drilling, aircraft, heavy machinery, mineral processing) will produce noise. The EAC Application will assess potential Project-related changes in noise levels. Noise generated from onsite and offsite construction and operation activities, such as transportation and operation of equipment, construction of mine infrastructure, and the transmission line, has the potential to affect human and wildlife receptors. However, due to the Project location, the potential effects of noise produced by the Project are anticipated to interact with a limited number of noise receptors. The mill building will also be enclosed, further reducing the potential for noise generation at the Project site.

4.5.4 Mining Waste and Tailings

The Project will produce two forms of mine waste: waste rock from mine development and mining activities, and tailings from mineral processing. Following early geochemical testing, Project tailings have been preliminarily characterized as non-potentially acid generating (NPAG) and/or non-metal leaching ~~(ML)~~. Additional geochemical studies are ongoing.

The TMF is designed to store up to approximately 74 megatonnes (Mt) of conventional, thickened slurried tailings. The Project will produce up to 343 Mt of waste rock.

Four WRSFs are proposed with two located at each of the Lawyers and Ranch sites. Where possible, waste rock will be repurposed and used for construction materials for the Project, including TMF construction, roads, aggregate cemented rock fill, and other infrastructure. Collection ditches will be constructed to collect surface water run-off and seepage from both the TMF and WRSFs to minimize the potential for impacts from mine contact water to the receiving environment. Non-contact water will be collected and diverted to the receiving environment for direct discharge. Tailings will be transported from the OPP via pipeline to the TMF.

4.5.5 Waste

There is the potential for other waste streams to be generated during the construction and operation phases of the Project. Industrial and domestic waste will be stored separately on site and management is anticipated to include:

- Incinerators for domestic and organic waste
- Waste storage/collection areas for recyclables
- Industrial waste streams for offsite disposal

- Sewage effluent
- Sludge disposal for onsite disposal

Transfer facilities will facilitate the separation, temporary storage, and inventory of various hazardous waste streams. Waste and recycling storage/transfer areas will be identified. Hazardous waste, such as used batteries and petroleum products, will be stored securely and shipped to approved disposal sites. Spill management, fire safety, and wildlife attractants policies will be developed and adhered to.

Hazardous waste materials, as defined by the Hazardous Waste Regulation (*Environmental Management Act*, BC Gov 2003a), such as spoiled reagents, waste petroleum products, and used batteries, will be generated throughout the Project's duration. A separate, secure storage area will be established for these types of hazardous waste materials, with controls and standard management practices implemented to maintain the safety of workers and the environment. Hazardous materials will be labelled and stored in containers for shipment to approved offsite disposal facilities. Waste streams will be tracked in accordance with federal and provincial regulations, such as the federal *Transportation of Dangerous Goods Act*, *1992* (S.C. 1992, c. 34).

4.6 Alternatives to the Project

Ore bodies have a fixed location, with the ore body characteristics influencing the identification and selection of mining method, processing rates, and type of supporting infrastructure required. Therefore, the only plausible alternatives to the Project are:

- **Alternative 1:** Proceed with the Project.
- **Alternative 2:** Not develop and operate the Project.

Proceeding with the Project is the preferred alternative due to the Project's contribution to Canada's resource-based economy and anticipated socio-economic benefits, including job creation. Thesis is not aware of any viable alternatives to mining the gold and silver deposits at this location that would fulfill the Project's intended purpose and provide the same socioeconomic benefits. Alternatives to the Project have therefore not been further considered.

4.7 Alternative Means for Carrying Out the Project

This section outlines alternative means for carrying out the Project, which are both technically and economically feasible, including the consideration of best available technologies.

Thesis has engaged with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation during Project planning and design to support the Project's ongoing alternatives analysis of a number of Project components. These collaborative efforts will continue, including through periodic workshops, on topics such as:

- Power source for the Project;
- Best available technologies; and
- Siting of components with design flexibility.

Collaborative workshops create opportunities for participants to discuss and provide input on Project elements that may affect the environment, wildlife, community, health, and cultural heritage. Feedback gathered from these workshops has informed, and will continue to inform, Project planning and design.

The alternative means of carrying out the Project, including the design or siting constraints, that are currently being considered are summarized in Table 4-5. The criteria used to assess the options included siting, topography, distance to Project components, operational efficiency, and potential environmental impact. Overall, alternative options will continue to be evaluated in consideration of a number of factors, including:

- The number of alternative options available;
- The technical and economic feasibility of each option;
- The safety and risk associated with the options;
- The potential effects associated with the potential options, including potential effects on Indigenous rights and interests; and
- Feedback shared by Indigenous Nations on the feasible options.

Thesis conducted an alternatives assessment in where options were presented to Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation.

The 2021 alternatives assessment included seven location options for the TMF and six options for the WRSF at the Lawyers site and seven options for the Ranch Site WRSF. The options that reduced the overall Project footprint were considered favourable and therefore the Project will have one processing plant and one TMF rather than each site having their own. This reduced the Project footprint by a minimum of 11.6 ha. In addition, selected technology for the control or treatment of effluent for the Project will meet Technology Readiness Level 7 as outlined in the requirements of the Technology Readiness Assessment Interim Technical Guidance (EMLI 2022).

Engagement with Indigenous Nations and other stakeholders will continue to inform the alternatives assessment. The final outcomes will be presented in the EAC Application.

Table 4-5 provides an overview of Project design and siting flexibility. Aspects of the Project that may be fixed or inflexible have been characterized as constraints. While for those that may be flexible, possible options that could be considered are identified.

Table 4-5: Summary of Project Design and Siting Flexibility

Proposed Project Components	Fixed or Flexible	Constraints/Other Options for Consideration	Alternatives Considered
Underground (UG) mining area and Infrastructure	Fixed	Location of deposit is fixed	—
Lawyers Site Open Pit (OP) area	Fixed	Location of deposit fixed	—
Ranch Site OP area	Fixed	Location of deposit fixed	—
Ore Processing Plant (OPP)	Flexible	Siting of OPP could change depending on location of Tailings Management Facility (TMF). For economic reasons, it should be in close proximity to deposits and the TMF.	—
Waste Rock Storage Facilities (WRSFs)	Flexible	Potential locations for the WRSFs have been assessed. Further details provided in Section 4.8	Proposed locations for the siting of surface WRSFs were selected according to specific criteria: located within a 5 km radius of the proposed open pits location (one exception included) • located in an area of practical topography • A single WRSF for waste rock management at each of the lawyers and Ranch sites. Lawyers Site • Six potential WRSF locations were assessed for the Lawyers Site. • The preferred location was selected due to its proximity to the processing plant, is situated on a hillside that facilitates water management, and is located in an area that is mostly cleared. Ranch Site • Seven potential WRSF locations were identified for the Ranch Site. • Two locations emerged as the preferred options for further consideration. • Five disposal alternatives were assessed for waste rock management at the Ranch Site: • Sub-aerial storage in a standalone WRSF • Subaqueous storage in a TSF • Sub-aerial storage in a TSF • Sub-aerial storage as a TSF embankment construction material (including waste rock buttressing) • Backfill storage in mined-out open pits.
TMF	Flexible	Potential locations for the TMF have been assessed. Further details provided in Section 4.8	Seven potential TSF locations were identified for the Lawyers Site. Sites for surface tailings management were selected according to specific criteria: • The TSF embankment must be located within a 5 km radius of the proposed mill location. • The site must have practical topography. • A single facility should be used for tailings management (just one location at the Lawyers Site) After applying pre-screening criteria, two locations emerged as the preferred options but one of these was located off property. The remaining location was ultimately selected as the most suitable site.
Power supply	Flexible	The preferred main power source is a transmission line extension from an existing power line. Alignment may change based on feedback from First Nations and environmental constraints. Alignment is preliminary and subject to change.	Transmission Line Corridor: No alternative transmission line extension corridor was considered; the transmission line will follow the existing road corridor due to economic and reduced disturbance reasons. A 200 m wide corridor has been selected as the preferred corridor, in which flexible alignment options will be considered as engineering and design continue to advance.

Proposed Project Components	Fixed or Flexible	Constraints/Other Options for Consideration	Alternatives Considered
Construction accommodation complex	Flexible	Siting options for the accommodation complex are being considered	—
New site access and on-site roads	Flexible	Final access road configuration will be based on final location of project components	—
Water supply for mining and processing activities	Fixed	Precipitation and runoff from active areas will supply water for mining and processing. Groundwater wells will be installed to supply additional water. Water used for processing will be recycled.	—
On-site waste and recycling management facilities	Flexible	Final location and configuration will confirm safety factors and minimum distances from key project components.	—
Bulk fuel storage & distribution	Flexible	Locations may be modified based on the final location of Project components.	—
Explosives storage facility	Flexible	Locations may be modified to minimize haul distances, optimize mining operations.	—
Ancillary facilities	Flexible	Locations may be modified based on the final location of Project components.	—
Note: The information in this table represents our understanding of the Project at submission of the IPD. This could be refined through engagement with Indigenous groups, government and the public.			

4.7.1 Other Considerations

In addition to the assessment of the TMF and WRSF locations and technologies, the below were considered:

- Mining Method Selection: Open pit and underground mining methods were considered, with a decision not to pursue fully underground mining due to economic feasibility.
- Project Consolidation: Consolidating the two projects was determined to be financially advantageous.
- Infrastructure Availability: Existing infrastructure is limited; upgrades will be made to the Cheni Airstrip, Cheni Road, and Ranch Road.
- Tailings Management Technology: Filtered tailings were considered but rejected due to high energy demands and cost implications, particularly given the potential need for self-generated power.

5.0 Legislative and Regulatory Context

The Project is proposed on provincial Crown lands. The Project will not be carried out on federal lands. Thesis has not requested, nor has it received, federal funding for the Project as of the completion of this document. Review of government policies has not identified any regulatory framework that the Project may not be compatible with. There are no known relevant government policies that the Project is not compatible with at this time. No known applicable international agreements between the Province and state or federal governments apply to the Project.

Under Section 95 of the IAA, the Project will undergo a Strategic Assessment of Climate Change (ECCC 2020). No other strategic assessment or regional assessment are being carried out in proximity to or within the Project area. Thesis is not aware of other studies, plans, or regional assessments that have been conducted near the Project location, outside of work conducted for the historical Cheni Mine, mineral exploration in the region, and biophysical studies associated with the Project. No strategic assessments relevant to the Project have been carried out.

5.1 Federal Impact Assessment Act and British Columbia Environmental Assessment Act

The Project will be subject to both provincial and federal review given the Project's proposed average ore production rate of approximately 5.1 Mtpa.

The proposed Project production rate exceeds BC's Reviewable Projects Regulation (B.C. Reg. 243/2019) threshold for a new mineral mine facility that during operations will have a production capacity of greater than or equal to 75,000 tonnes per year of mineral ore. Under Chapter 51, SBC 2018 of the *EAA*, this triggers the requirement for an EA.

Given the proposed production rate, the Project will also require a federal decision statement, as it is considered a "designated project" under the federal *Physical Activities Regulations* (SOR/2019-285) of the IAA. The Project also includes the activities to construct, operate, decommission and abandon a new metal mill with an ore input capacity of 5,000 tpd or more, which is described in item 18 (d) of the Schedule to the Regulations. Being a new metal mine with an ore input capacity of 5,000 tpd or more, the Project triggers the requirement for an EA.

5.2 Substitution and Assessment Timing

When both federal and provincial assessments are required for a proposed project in BC, requirements of both federal and provincial legislation can be met through a single process known as "substitution." The substitution process is undertaken in accordance with *Impact Assessment Cooperation Agreement between Canada and British Columbia* (Government of Canada and BC Gov. 2020). Use of the substitution process depends upon a request from the BC EAO and agreement by the federal minister responsible for the IAA. At the end of a substituted EA, both levels of government retain their authority to decide whether the project is approved to proceed, and if so, on what conditions.

It is expected that the EAO and IAAC will coordinate the initial phases of their respective processes for the Project and the EAO will request that the Project proceed through a substituted process led by the EAO.

5.3 Other Anticipated Provincial and Federal Permits, Licenses, and Approvals

A summary of other anticipated provincial and federal permits and approvals that may be required for the Project are outlined in Table 5-1 and Table 5-2 below.
The information presented is subject to confirmation by regulatory authorities as part of the assessment process. A list of existing permits and approvals obtained by Thesis is provided in Section 3.5.

Table 5-1: Anticipated Provincial Permits, Licenses and Approvals

Permit, License or Approval	Legislation	Responsible Agency	Description
Mines Act Permit	*Mines Act* (BC Gov 1996e)	Ministry of Mining and Critical Minerals (MCM)	Approves the mine plan and the reclamation and closure plan.
License of Occupation	*Land Act* (BC Gov 1996d)	Ministry of Water, Land and Resource Stewardship (WLRS)	Authorizes the use of Crown Land for transmission lines and other supporting infrastructure.
Waste Discharge Permit and Waste Storage Approval	Environmental Management Act (BC Gov 2003a)	Ministry of Environment and Parks (ENV)	Permits discharge of effluent to water, storage/treatment of wastes, disposal of solid waste to land, and discharge of emissions to the atmosphere.
Heritage Conservation Act s. 12.2 Heritage Inspection Permit or Heritage Investigation Permit; s. 12.4 [Site] Alteration Permit	Heritage Conservation Act (BC Gov 1996c)	Ministry of Forests, Archaeology Branch	Authorizes Heritage inspection, investigation, or site alteration of lands potentially affected by the Project.
Wildlife Act Permit	*Wildlife Act* (BC Gov 1996g)	ENV, Environmental Stewardship Division	Permits wildlife salvages and surveys of wildlife and their habitat, and bird nest removal or relocation.
Construction Permit for a Potable Water Well	Drinking Water Protection Act (BC Gov 2001)	BC Ministry of Health, Northern Health Authority	Permits construction of a groundwater well for domestic water use.
Water System Construction Permit	Drinking Water Protection Act (BC Gov 2001)	BC Ministry of Health, Northern Health Authority	Required for construction of a potable water system for temporary, seasonal accommodation complexes.
Drinking Water System Operations Permit	Drinking Water Protection Act (BC Gov 2001)	BC Ministry of Health, Northern Health Authority	Required for operation of a potable water system at temporary, seasonal accommodation complexes.
Short Term Use of Water Permit	Water Sustainability Act (BC Gov 2014)	ENV, Water Stewardship Branch	Required for short-term use of water from freshwater streams and lakes.

Permit, License or Approval	Legislation	Responsible Agency	Description
Water Sustainability Act Approval	*Water Sustainability Act* and corresponding Dam Safety Regulation (BC Gov 2014; BC Gov 2016)	WLRS	Required for changes relating to streams including diversions, storage and use of water, and nuisance water management from mining operations.
Water License	Water Sustainability Act (BC Gov 2014)	WLRS	Required for construction and operation of Project activities requiring the diversion of surface water or groundwater sources for potable or process water.
Effluent Discharge Permit	Environmental Management Act (BC Gov 2003a)	ENV	Required for the discharge of wastewater and other effluents into the environment.
Licenses to Cut	*Forest Act*, Part 3, Section 8.2, License to Cut Regulation and Provincial Forest Use Regulation (BC Gov 1996a; BC Gov 2006; BC Gov 1995)	Ministry of Forests, Forest Tenures Branch	Required to harvest Crown timber in a specific area over a relatively short time period.
Industrial Access Permit	Transportation Act (BC Gov 2004)	Ministry of Transportation and Transit (MOTT)	Required for new roads that join onto public roads controlled by MOTT.
Special Use Permit	Mining Right of Way Act, section 3, and the Forest Practices Code of British Columbia Act (BC Gov 1996f; BC Gov 1996b)	Ministry of Forests	Required for the construction or maintenance of a road, bridge, or drainage structure, weather station, weight scales, or quarries used for road construction or maintenance on Crown land within a provincial forest.
Permit for Regulated Activities	Public Health Act (BC Gov 2008)	Ministry of Health	A required permit for worker accommodation due to the need to provide potable water, processing wastewater, or managing septic systems.

Permit, License or Approval	Legislation	Responsible Agency	Description
Hazardous Waste Generator Registration	*Environmental Management Act*, Hazardous Waste Regulation (BC Gov 2003b)	ENV	A registration process required for the owner of waste (e.g., property owner) that is identified as being hazardous, which involves detailing the steps taken to store hazardous waste at the generation location.
Sewage Registration	*Environmental Management Act*, Municipal Wastewater Regulation (BC Gov 2003c)	ENV	Mandatory registration identifying specific information about sewage discharge activities.
Food Service Permits	Public Health Act (BC Gov 2008)	Provincial Health Services Authority	Required to operate a kitchen in a mining accommodation complex.
Code of Practice for the Concrete and Concrete Products Industry – Discharge Registration	*Environmental Management Act,* Code of Practice for the Concrete and Concrete Products Industry (MECCS 2007)	Ministry of Environment & Climate Change Strategy	Required for discharging to the environment from concrete and concrete products industry

Table 5-2: Anticipated Federal Permits, Licenses, and Approvals

Permit, License or Approval	Federal Legislation	Responsible Agency	Description
Authorization under Paragraphs 34.4(2)(b) and 35(2)(b)	*Fisheries Act* (Government of Canada 1985b)	Fisheries and Oceans Canada (DFO)	Regulates work or activities that may result in the death of fish or that may result in the harmful alteration, disruption, or destruction of fish habitat.
Migratory Birds Convention Act, 1994 Authorization	*Migratory Birds Convention Act, 1994*, Migratory Bird Sanctuary Regulations (Government of Canada 1994a; Government of Canada 1994b)	Environment and Climate Change Canada (ECCC)	Regulates the deposit of substances potentially harmful to migratory birds or vegetation clearing during the migratory bird nesting season (as outlined by ECCC for the Project area, Zone A2, early April to mid-August [ECCC 2025]).
Species at Risk Act Permit	*Species at Risk Act* (Government of Canada 2002)	ECCC, DFO	Permit is required in situations where the Project needs to undertake activities that affect a listed wildlife species.
Explosive Licenses and Permits	*Explosives Act*, Explosives Regulations, 2013 (Government of Canada 1985a; Government of Canada 2013)	Natural Resources Canada	An Explosive License is required for factories and magazines, and an Explosive Permit is required for vehicles used for the transportation of explosives.
Transportation of Dangerous Goods Permits	Transportation of Dangerous Goods Act, 1992 (Government of Canada 1992)	Transport Canada	Permits are required for the classification, documentation, marking, means of containment, required training, emergency response, accidental release, and protective measures associated with the transportation of dangerous goods. Permits are also required for the transportation of dangerous goods by road, rail, or air.

6.0 Indigenous Nations Interests and Engagement

This section summarizes Thesis' approach to engagement with potentially affected Indigenous Nations, including Thesis' engagement to date and planned future engagement. Thesis' approach to engagement reflects a commitment to, among other things, early, transparent, and flexible communication. Thesis' engagement methods are designed to be responsive, respectful, and practically useful for Project planning and design.

Drafts of this IPD and EP (Appendix F) were shared with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation for review and feedback. Thesis provided capacity funding and availability to meet to discuss feedback on the draft documents in advance of submitting the IPD to government. Comments received from the Nations were addressed, as appropriate, in the IPD and EP prior to regulatory submission. Where comments may not have been resolved prior to filing with the EAO, Thesis will establish follow up or next steps to continue discussions as the Project progresses through the EA. A detailed account of past and planned future engagement is found in the EP.

6.1 Identified Indigenous Nations

Thesis has drawn from a range of sources to identify which Indigenous Nations to initiate early engagement with. These sources include:

- **BC's Consultation Areas Spatial Tool**: Used to generate a list of Indigenous Nations with treaty rights or asserted or proven Aboriginal rights or title and interests in areas (Consultation Areas) that may overlap with the Project and areas of potential direct and indirect effects.
- **A commissioned ethnohistorical report**: Conducted by an ethnohistorian to assess which Indigenous Nations identified by the Consultation Areas Spatial Tool have a documented historical presence in the vicinity of the Project (Clark 2025).
- **Government referrals**: Issued through early exploration permitting processes, identifying Indigenous Nations that the Crown considers as potentially holding relevant rights or interests.
- **Direct outreach and dialogue**: Ongoing conversations with Indigenous Nations that have expressed interest or concern about the Project.

Thesis' use of BC's Consultation Areas Spatial Tool identified nine Indigenous Nations with Consultation Areas overlapping the Project and areas of potential direct and indirect effects: Binche Whut'en, Daylu Dena, Dease River First Nation, Kwadacha Nation, Liard First Nation, Tahltan Nation, Takla Nation, Tsay Keh Dene Nation, and West Moberly First Nations.

Thesis began engagement as early as 2018 with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation, whose traditional territories partially overlap the Project area. Through engagement, these Indigenous Nations have contributed to exploration program planning and have helped shape early Project planning and design. The basis for Thesis' focused engagement with each of these Indigenous Nations is outlined in the EP.

Thesis understands that the list of Indigenous Nations identified for engagement may change as the EA progresses. Thesis will engage with Indigenous Nations with Aboriginal rights or interests that may be adversely impacted by the Project. Thesis will provide relevant Project information and, where appropriate, collaboratively determine the frequency and methods of engagement with such Indigenous Nations. Engagement activities will be tailored to each Indigenous Nation's interests and priorities and may include information-sharing meetings, opportunities to review and provide input on EA materials, and other methods for receiving and responding to feedback.

6.2 Indigenous Nation Background and Applicable Agreements

Thesis is developing the Project with input from Indigenous Nations through ongoing review and engagement activities. Engagement with Indigenous Nations has informed the development of the IPD. Thesis understands that input received reflects each Nation's governance systems and approaches. To date, no Indigenous laws, customs, or policies have been shared that are relevant to the Project. Known agreements between Indigenous Nations and the government that may influence the Project are described in the following sections, though others may be identified or come into effect during the EA process.

6.2.1 Kwadacha Nation

6.2.1.1 Background

Kwadacha Nation's traditional territory is located in the north-central interior of BC. Kwadacha Nation's main community is located at Kwadacha (Fort Ware), approximately 430 km north-northwest of Prince George at the confluence of the Fox, Kwadacha, and Finlay Rivers in the Rocky Mountain Trench, approximately 95 km east of the Project.

Kwadacha Nation has three Reserves with a combined area of approximately 385 ha in the vicinity of Kwadacha (Fort Ware) (CIRNAC 2025b). As of September 2025, Kwadacha Nation had a registered population of 615 people, with 315 of those people living on Kwadacha Nation's Reserve lands (CIRNAC 2025b).

Thesis has entered into a series of exploration agreements with Kwadacha Nation to guide cooperation and communication in relation to the mineral exploration program for the Project. The agreements outline shared expectations regarding information sharing, environmental management, cultural resource protection, and opportunities for community involvement. The agreements have provided a foundation for regular engagement and structured input from Kwadacha Nation from the early stage of Project planning and design.

6.2.1.2 Applicable Agreements with British Columbia

In February 2024, Kwadacha Nation and the Government of BC signed a Reconciliation Framework Agreement (RFA). The agreement establishes a negotiation process between the parties with the objective of advancing long-term reconciliation and co-developing decision-making frameworks in areas including, among other things, land use and economic development (Kwadacha Nation and BC Gov 2024).

Kwadacha Nation is negotiating independently with the governments of Canada and BC outside the BC Treaty Process (BC Gov 2024b). Thesis is aware that Kwadacha Nation has several other agreements with the Government of BC related to natural resource use; these are understood to be project or industry-specific and are therefore not thought to be directly relevant to the EA.

As described in Section 3.2, Thesis is aware that BC and the Kaska Dena Council, of which Kwadacha Nation is a member First Nation, are collaboratively undertaking the KLUPP process. While Thesis has not engaged with Kwadacha Nation specifically on this initiative, Thesis continues to monitor the KLUPP process and remains open to understanding how outcomes of the initiative may be relevant to the Project over time.

6.2.2 Tsay Keh Dene Nation

6.2.2.1 Background

Tsay Keh Dene Nation's traditional territory is located in the north-central interior of BC. Tsay Keh Dene Nation's main community is located at Tsay Keh Dene, approximately 360 km north-northwest of Prince George at the mouth of the Finlay River, where it enters Williston Reservoir approximately 145 km southeast of the Project.

Tsay Keh Dene Nation has six Reserves with a combined area of approximately 1,443 ha in the vicinity of Tsay Keh Dene (CIRNAC 2025e). As of September 2025, Tsay Keh Dene had a registered population of 522 people, with 225 of those people living on Tsay Keh Dene Nation's own Reserve lands or Crown lands to which Tsay Keh Dene Nation also holds rights (CIRNAC 2025e).

Thesis has entered into a series of exploration agreements with Tsay Keh Dene Nation to guide cooperation and communication in relation to the mineral exploration program for the Project; an EA Collaboration Agreement to guide how the parties will work together through the EA; and an equity agreement whereby Tsay Keh Dene Nation became an investor in the Project.

6.2.2.2 Applicable Agreements with British Columbia

Tsay Keh Dene Nation is currently negotiating with the governments of Canada and BC through Stage 4 of the BC Treaty Process (BC Gov. 2024c). In March 2023, Tsay Keh Dene Nation and BC signed an Incremental Treaty and Reconciliation Agreement (Tsay Keh Dene First Nation and BC Gov. 2023). The agreement establishes a negotiation process between the parties with the objective of executing a comprehensive treaty, advancing long-term reconciliation and developing shared approaches to land and resource decision-making, including in the areas of land use and economic development (Tsay Keh Dene First Nation and BC Gov. 2023).

Tsay Keh Dene Nation is also a signatory to a 2020 Environmental Stewardship Initiative Agreement with the Province, which provides a framework for collaboratively assessing cumulative effects and supporting ecosystem-based stewardship planning through the integration of Indigenous Knowledge and science (Tsay Keh Dene Nation and BC Gov. 2020).

Thesis is aware that Tsay Keh Dene Nation has several other agreements with the Government of BC related to natural resource use; these are understood to be project or industry-specific and are therefore not thought to be directly relevant to the EA.

6.2.3 Takla Nation

6.2.3.1 Background

Takla Nation's traditional territory is located in the north-central interior of BC. Takla Nation's main community is located at Takla Landing, approximately 110 km northeast of Smithers and 235 km south-southeast of the Project.

Takla Nation has 17 Reserves with a combined area of approximately 809 ha around Takla Lake and Bear Lake (CIRNAC 2025d). As of September 2025, Takla Nation had a registered population of 961 people, with 208 of those people living on Takla Nation's Reserve lands (CIRNAC 2025d).

Thesis has entered into a series of exploration agreements with Takla Nation to guide cooperation and communication in relation to the mineral exploration program for the Project. The agreements outline shared expectations regarding information sharing, environmental management, cultural resource protection, and opportunities for community involvement. The agreements have provided a foundation for regular engagement and structured input from Takla Nation from the earliest stages of Project planning and design.

6.2.3.2 Applicable Agreements with British Columbia

Takla Nation is currently negotiating with the governments of Canada and BC through Stage 4 of the BC Treaty Process (BC Gov 2023b).

Thesis is aware that Takla Nation has several agreements with the Government of BC related to natural resource use; these are understood to be project or industry-specific or expired and are therefore not thought to be directly relevant to the EA.

6.2.4 Tahltan Nation

6.2.4.1 Background

Tahltan Nation's traditional territory is located in the northwestern interior of BC. Tahltan Nation is comprised of two bands: the Tahltan Band and the Iskut Band. The Tahltan Central Government (TCG) is the central administrative governing body for both bands.

The Tahltan Band's main community is located at Telegraph Creek on the Stikine River, approximately 225 km west-northwest of the Project, and holds 12 Reserves totaling approximately 1,377 ha (CIRNAC 2025c). The Iskut Band's main community is at Kluachon Lake, approximately 157 km east-northeast of the Project, with three Reserves totaling approximately 162 ha (CIRNAC 2025a). As of September 2025, the Tahltan Band has a registered population of 2,218 (299 living on Reserve lands) (CIRNAC 2025c), and the Iskut Band has a registered population of 827 (341 living on Reserve lands; CIRNAC 2025a).

Thesis has entered into a series of exploration agreements with Tahltan Nation to guide cooperation and communication in relation to the mineral exploration program for the Project. Thesis is in discussions with Tahltan Nation concerning an agreement to guide how the parties will work together through the EA.

6.2.4.2 Applicable Agreements with British Columbia

In 2013, the TCG and BC entered into a Shared Decision-Making Agreement (TCG and BC Gov 2013). The purpose of the agreement is to foster a government-to-government relationship that would enable the parties to collaborate on land and resource issues as a tangible step toward longer-term reconciliation of their interests (TCG and BC Gov 2013). To achieve this end, the agreement establishes, among other things, a framework through which the parties will participate in a shared decision-making process for land and resource matters, including EAs, throughout the TCG's asserted territory (TCG and BC Gov 2013).

The TCG is negotiating independently with Canada and BC outside the BC Treaty Process (BC Gov 2023a). Thesis is aware that TCG has several agreements with BC related to natural resource use; these are understood to be project or industry-specific or expired and are therefore not thought to be directly relevant to the EA.

6.3 Early Project Engagement and Development of the IPD and EP

6.3.1 Early Project Engagement

Since the earliest stages of Project planning, Thesis has actively engaged with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation to help shape the development of the Project. As outlined in detail in the EP, this work has involved a range of structured activities that vary between the Nations; from in-person meetings and site visits to community workshops and regular email and phone communications. The purpose of this engagement has been to support information sharing, foster mutual understanding, and seek early alignment on aspects of the Project.

The perspectives shared by Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation in particular have informed a wide range of planning decisions. In collaboration with these Indigenous Nations, Thesis has adapted aspects of its environmental monitoring and reclamation programs, existing conditions data collection, Project infrastructure layout and design, and reclamation program.

Tahltan Nation also has a long history of engagement with Thesis that has helped to inform Project planning and design. These efforts, and how they have informed the Project, are described in detail in the EP and summarized in Table 6-1 below.
The responses in Table 6-1 reflect Thesis' engagement to date, with the understanding that ongoing engagement is required to deepen discussions with Indigenous Nations and incorporate their feedback and interests into ongoing Project design as the EA proceeds.

Table 6-1: Summary of Project Collaborations with Indigenous Nations

Key Feedback Gathered through Collaboration on Project Prior to Submission of this IPD	How the Proponent Addressed the Feedback
Interest in providing input on specific Project elements.	Thesis has provided opportunities for Indigenous Nation input on Project design through workshops focused on mine components with design flexibility. Based on this input, Thesis has re-aligned and relocated several proposed mine components, including moving the proposed Tailings Storage Facility (TSF) to avoid a culturally sensitive area.
Interest in economic opportunities related to the Project.	Thesis has supported Indigenous economic participation by providing over $50 million in contracting opportunities to Indigenous Nation-owned or affiliated companies, exploring opportunities for Indigenous equity ownership in the Project, and engaging with community members at career fairs and industry day events.
Management of cumulative effects of resource development in the Toodoggone Region.	The Project is being developed on a brownfield site previously disturbed by historical mining. To limit the total disturbance footprint through ongoing exploration activities, Thesis has undertaken progressive reclamation of these areas and voluntarily committed to an exploration permit condition that limits the number of un-reclaimed drill sites at any given time. Thesis consolidated the Lawyers and Ranch projects into a single Project. Developing a single Project reduces the Project's overall disturbance footprint and contribution to cumulative effects in the region by using shared infrastructure such as the ore processing plant (OPP) and Tailings Management Facility (TMF) (see Table 4-1).
Potential effects of developing mineral resources exclusively through open pit (OP) mining methods.	Thesis assessed the feasibility of using underground mining methods as an alternative to reduce surface disturbance. As a result, underground mining methods have been identified as feasible at the Lawyers Site and will be used where practicable.
Potential for site access to lead to increased public access to areas used for traditional activities, and restrictions to impede access to the area in which the Project is located by Indigenous Nation members.	Thesis installed a gate along the site access road to limit public entry, while striving to accommodate access for Indigenous Nation members to areas within Thesis' mineral claims that overlap with their traditional territory. It is noted that access requests by Indigenous Nation members cannot be accommodated in every case due to operational and safety requirements.

Key Feedback Gathered through Collaboration on Project Prior to Submission of this IPD	How the Proponent Addressed the Feedback
Collection of aquatic existing conditions data from a lake of cultural importance, located approximately 30 kilometres (km) from the Project.	Thesis commissioned a targeted aquatic study for the lake, conducted collaboratively with Indigenous Nations.
Identify and protect archaeological and heritage resources that may be affected by Project activities.	Thesis developed and implemented a Heritage Resource Protection Plan and Archaeological Chance Find Procedure with Indigenous Nation input, sought ethnographic data from Indigenous Nations for inclusion in the Archaeological Overview Assessment, and invited Indigenous Nation representatives to participate in annual archaeological field visits.
Require capacity funding to support engagement, including on matters related to Project design and the Environmental Assessment (EA) process.	Since 2020, Thesis has provided annual capacity funding payments to Indigenous Nations. Additional funding has been made available to support specific initiatives, including the review of EA documents, participation in Project design workshops, and site visits.
Indigenous Nation preferences for EA process.	Thesis is engaging with Indigenous Nations to understand their specific preferences for engagement during the EA process. Thesis has concluded EA Collaboration Agreements with Kwadacha Nation and Tsay Keh Dene Nation and has initiated discussions with Takla Nation and Tahltan Nation respecting similar agreements.
Requests for in-community engagement and site visits for leadership and Elders.	Thesis has organized multiple site visits for Indigenous Nation leadership and Elders, including participation in onsite native seed and stem collection workshops for future site revegetation. In addition, Thesis has started visiting Indigenous Nation communities to introduce the company and the Project to community members. The frequency of visits is anticipated to increase over time.
Potential effects of Project activities on the land and the potential spread of non-native, invasive plant species.	Thesis implements a progressive approach to reclamation for the exploration program, which includes the implementation of a Reclamation Plan in collaboration with Indigenous Nations. Thesis employs full-time Reclamation Supervisors, has reclaimed approximately 90% of land disturbed by the company's exploration activities, and has invited Indigenous Nation representatives to participate in onsite seed and stem collection workshops to support future site revegetation.

Key Feedback Gathered through Collaboration on Project Prior to Submission of this IPD	How the Proponent Addressed the Feedback
Potential effects of Project activities on wildlife.	Thesis has worked with Indigenous Nations to identify wildlife priorities and develop mitigation strategies for the ongoing mineral exploration program. This includes the creation of a Wildlife Monitoring and Management Plan and a Caribou Mitigation Strategy; both developed in collaboration with Indigenous Nations. Thesis also deploys full-time environmental representatives onsite, maintains an extensive wildlife camera network, and avoids mechanized work during sensitive wildlife periods.

6.3.2 Development of the IPD and EP

Drafts of both the IPD and EP were shared with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation prior to official regulatory submission. Capacity funding was provided to each of these Nations to support their review of the draft documents. Thesis engaged with the Nations, where available, through written correspondence and meetings, to review the documents and discuss feedback. Thesis used the feedback received to refine the IPD and EP and communicated how related areas of future work would be addressed.

At the time of submission, Thesis had not received any feedback on the IPD or EP from Tahltan Nation. Thesis looks forward to engaging with Tahltan Nation on the IPD and EP through Early Engagement. Feedback received will be addressed in collaboration with Tahltan Nation through future EA deliverables and engagement activities, as appropriate.

Further information on Thesis' engagement with these Indigenous Nations on the IPD and EP are provided under the Nation-specific headings in Section 3.4 of the EP (Appendix F).

6.3.3 Planned Indigenous Engagement

Thesis will continue to engage with Indigenous Nations in line with the engagement approach and principles outlined in this IPD and EP. Input and feedback received during Early Engagement will be tracked using structured engagement logs and issue-response tables. These tools will document questions, concerns, and suggestions, and will inform the development of the Detailed Project Description (DPD) and, where appropriate, Project planning and design. Where possible, Thesis will work with Indigenous Nations to review early drafts or discuss preliminary content and will provide summaries of how feedback was considered and addressed in Project planning and design. Additional detail is available in the appended Engagement Plan (Appendix F).

7.0 Government, Public, and Stakeholder Engagement

Thesis is committed to timely engagement with government agencies, the public, and other relevant stakeholders. This section briefly identifies relevant government agencies, public, and stakeholders that may have an interest in the Project. The EP provides more information on engagement on the Project to date, as well as planned engagement with both the public and government agencies.

Thesis will continue to engage with government agencies, the public, and other relevant stakeholders. consistent with the engagement approach and principles outlined in Section 2 of the EP. Input and feedback received during Early Engagement will be tracked using structured engagement logs and issue-response tables. These tools will document questions, concerns, and suggestions, and will inform the development of the DPD and, where appropriate, Project planning and design. Where possible, Thesis will work with government agencies, the public, and other relevant stakeholders to review early drafts or discuss preliminary content and will provide summaries of how feedback was considered and addressed in Project planning and design.

7.1 Government Agencies

Government agencies based on jurisdictional authority and relevance to the Project's benefits and potential effects are identified in Table 7-1. The list is preliminary and will be refined based on preliminary engagement on this document and through Early Engagement.

Thesis has been conducting exploration activities on the Project site since 2018. These activities required engagement with government agencies to obtain permits. No issues around public safety have been raised by government agencies.

Table 7-1: Identified Local, Provincial, and Federal Government Agencies

Provincial Government Agencies
Environmental Assessment Office
Ministry of Environment and Parks
Ministry of Forests
Ministry of Indigenous Relations and Reconciliation
Ministry of Jobs, Economic Development and Innovation
Ministry of Mining and Critical Minerals
Ministry of Transportation and Transit
Ministry of Water, Land and Resource Stewardship
Northern Health
Federal Government Agencies
Impact Assessment Agency of Canada
Fisheries and Oceans Canada

Provincial Government Agencies
Environment and Climate Change
Natural Resources Canada
Transport Canada
Crown Indigenous Relations and Northern Affairs Canada
Indigenous Services Canada
Local Government
Peace River Regional District
District of Mackenzie
Town of Smithers
City of Prince George

Thesis will engage with relevant government agencies and regulatory authorities as part of the EA and permitting processes. Agencies with direct interest in the Project will participate in the Technical Advisory Committee (TAC) led by the EAO. Several agencies also have permitting authority over the Project. Table 7-2 outlines the relevant federal and provincial agencies identified to date. Thesis will work in collaboration with the EAO to confirm the appropriate agency contacts for further engagement. Engagement with federal and provincial agencies to date has focused on the regulatory review process.

Table 7-2: Summary of Engagement with Federal and Provincial Governments

Date	Agencies	Summary of Engagement	Key Points and Actions
16-Jun-25	Environmental Assessment Agency (EAO), Ministry of Mining and Critical Minerals (MCM), and Ministry of Environment and Parks (ENV)	Introductory meeting between Thesis and provincial agencies to introduce the Project and to discuss initiating regulatory review in Fall 2025.	Discussion focused on Project introduction, opportunities for regulatory efficiency and predictability, and EAO's upcoming review of the Initial Project Description (IPD)/Engagement Plan (EP).
29-Jul-25	Impact Assessment Agency of Canada (IAAC)	Introductory meeting between Thesis and IAAC to introduce the Project to IAAC officials and to discuss initiating regulatory review in Fall 2025.	Discussion focused on Project introduction, opportunities for regulatory efficiency and predictability, and IAAC's upcoming review of the IPD.
02-Sep-25	EAO	Thesis shared a preliminary working draft IPD and EP with EAO for review.	Not applicable.

Date	Agencies	Summary of Engagement	Key Points and Actions
02-Sep-25	IAAC	Thesis shared a preliminary working draft IPD with IAAC for review.	Not applicable.
03-Sep-25	EAO	Thesis met with EAO to discuss Project details as well as collaboration and next steps to prepare for initiating Early Engagement.	Alignment on EAO's draft IPD/EP review. Meeting to be set with EAO and IAAC in early October 2025 to discuss steps for initiating process.
04-Sep-25	IAAC	Thesis met with IAAC to discuss collaboration and next steps for IPD review.	Not applicable.
05-Sep-25	EAO	EAO provided initial feedback on Thesis' preliminary drafts of the IPD and EP.	Thesis made applicable changes in the IPD and EP in advance of filing.
12-Sep-25	IAAC	IAAC provided initial feedback on Thesis' preliminary drafts of the IPD.	Thesis made applicable changes in the IPD in advance of filing.
09-Oct-25	EAO and IAAC	Thesis met with EAO and IAAC to discuss next steps for initiating Early Engagement.	Regular meetings initiated with Thesis, EAO, and IAAC for process coordination.
22-Oct-25	EAO and IAAC	First regular coordination meeting with EAO and IAAC to discuss Project updates.	Discussion focused on Indigenous and local government engagement, timelines for submission of the IPD and EP, and preparations for the public comment period.

Thesis will continue to engage with local governments that may experience potential effects of the Project, including changes to local demographics, employment, local economy, and infrastructure and services. These local governments may include the Peace River Regional District, the District of Mackenzie, the Town of Smithers, and the City of Prince George. To date, Thesis has held initial meetings with local governments to introduce the Project, outline the regulatory process, and discuss the approach to ongoing engagement. A summary of engagement to date is provided in Table 7-3. Engagement is an integral part of the EA process, and discussions with relevant local governments, including with health authorities, will continue throughout the EA process.

Table 7-3: Summary of Engagement with Local Governments

Date	Local Government	Summary of Engagement	Key Points and Actions
22-Oct-25	Town of Smithers	Introductory meeting between Thesis and the Town of Smithers.	Discussion focused on Project introduction, anticipated regulatory process, and approach to ongoing engagement.
23-Oct-25	District of Mackenzie	Introductory meeting between Thesis and the District of Mackenzie.	Discussion focused on Project introduction, anticipated regulatory process, and approach to ongoing engagement.
24-Oct-25	Peace River Regional District	Introductory meeting between Thesis and the Peace River Regional District.	Discussion focused on Project introduction, anticipated regulatory process, and approach to ongoing engagement.
29-Oct-25	City of Prince George	Introductory meeting between Thesis and the City of Prince George.	Potential meeting to be set with the Regional Board to formally present the Project

7.2 Public Stakeholders

The Project is located in a geographic region that has limited interface with municipal communities, approximately 10 hours by road from the nearest major centre. Thesis will identify members of the public (i.e., members of potentially affected municipal communities) or other stakeholders, including groups or parties that may use the area for:

- Recreational purposes;
- Hunting, trapping, and fishing; and
- Other economic activities.

To date, public engagement has not taken place. Public engagement is an integral part of the EA process and will be commenced as part of Early Engagement. Thesis has been conducting exploration activities for the past seven years. No issues around public or environmental safety have been raised by the public or stakeholders.

As noted in Section 5.2, Thesis has assumed that the Project will follow a substituted EA process. Prior to the substituted EA process being approved, Thesis will initiate the federal process with submission of this IPD and a Plain Language Summary. Following approval of the substituted EA process, feedback received from the IAAC will be incorporated into the EAC Application to meet the requirements of both provincial and federal processes.

With the submission of this IPD, there will be a minimum 30-day public comment period. The EAO will post the IPD on the EAO Project Information Centre (EPIC) website, marking the beginning of the public comment period. During this time, members of the public and other stakeholders will have the opportunity to provide feedback on the IPD and EP, and the EAO will develop responses to public comments.

Project details and updates can be found at the Project website: https://thesisgold.com/lawyers-ranch-project/.

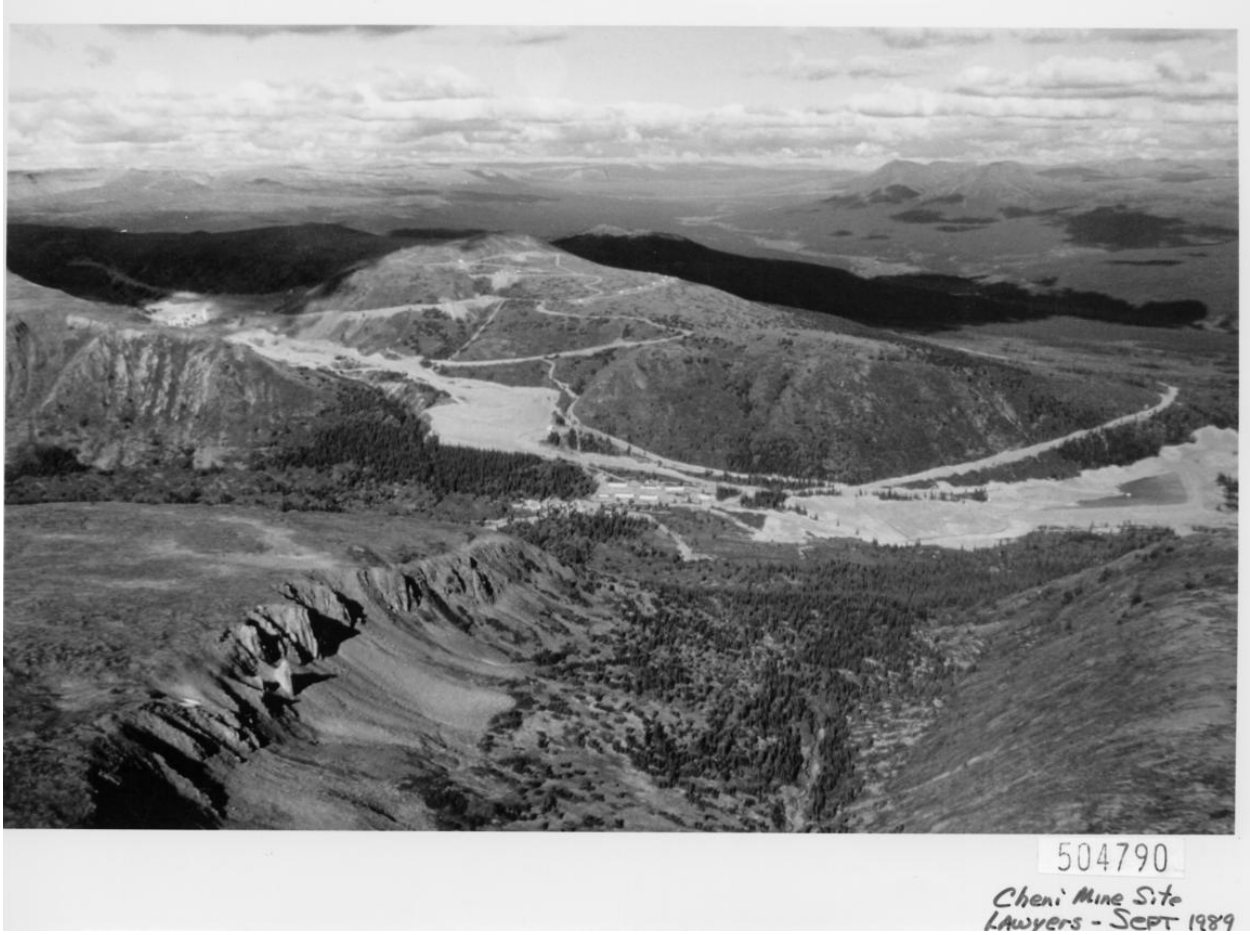
8.0 Existing Environmental Setting

This section provides a brief description of the physical, biological, human, and archaeological environment setting of the Project, a description of the existing Project site and its history, and a summary of the existing conditions program being conducted by Thesis to support the EAC Application.

8.1 Project Site

The Project is located on a brownfield site with a long history of mining and mineral exploration. The Project is situated on the site of the historical Cheni Mine (Photo 8-1), formerly operated by Cheni. The Cheni Mine was primarily an underground operation with underground mining taking place at the Lawyers Site between 1989-1992, and surface mining activities at the Ranch Site in 1991 (JDS 2024). Extensive drilling took place at the Ranch Site between 1982 and 2007 across 14 gold-mineralized zones (JDS 2024).

Photo 8-1: Historical Photo of the Cheni Mine Site, September 1989 ("Photo-View WNW", 1989)



Source: View WNW. 1989. Photo - View WNW – Metsantan Valley and Toodoggone Valley – Cheni Gold Mine. September 1, 1989.

Today, the Project is in an area that is predominately characterized as active brownfield. Background studies are currently underway to further characterize the existing conditions in support of Project planning. Photo 8-2 and Photo 8-3 are present day photos of the Project sites.

Photo 8-2: Present Day Photo of the Lawyers Camp on the Lawyers Site, facing West

Photo 8-3: Present Day Photo of the Ranch Camp on the Ranch Site, facing South

8.2 Project Existing Conditions Studies

In close collaboration with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation, Thesis has been studying the existing conditions at the Lawyers and Ranch sites since 2021. The purpose of these studies is to gain a thorough understanding of the environments and ecosystems that exist and the ways the members of Indigenous Nations currently use these areas. This knowledge will be used to inform the EA. The work has been led by Indigenous Nation-owned and affiliated companies: Chu Cho Environmental LLP (wholly owned by Tsay Keh Dene Nation), Sasuchan Environmental (affiliated with Takla Nation), and Kwadacha DWB Consulting (affiliated with Kwadacha Nation). To date, the existing conditions studies have focused on air quality and climate, noise, surface and ground water, terrain and soils, vegetation and ecosystems, fish and fish habitat, and wildlife and wildlife habitat assessment. Archaeological assessment has been conducted by In Situ Archaeology. A complete list of studies, including monitoring that are completed or underway, is provided in Appendix B.

Thesis' relationships with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation enable ongoing collaboration, mutual leadership and understanding, and review of existing conditions studies. Thesis continues to seek Indigenous Knowledge to inform existing conditions studies and the EA through workshops, site visits, and review of existing information.

For example, Thesis has learned through meetings and workshops over the past 5 years:

- Specific areas in the vicinity of the Project may be popular areas for members of Indigenous Nations to exercise Rights and related practices.
- Indigenous Nations have their own environmental data and have conducted some modelling in their territories.
- Caribou and bull trout are important species in the region.
- Historical trails and areas in the region were traditionally used by Indigenous Nations.

The following sections provide a high-level description of the Project setting based on available information. Thesis will provide detailed reports in the EAC Application that describe existing conditions for the physical, biophysical, human, and archaeological environment relevant to the Project, as informed by over five years of site-specific study and Indigenous Knowledge.

8.2.1 Physical Environment

The Project is located within the Boreal Mountains and Plateaus Ecoregion in the Northern Boreal Mountains Ecoprovince, characterized by rugged mountains, lowlands, and rolling high plateaus (Demarchi 2011). The Project is situated in moderate terrain with elevations ranging from 1,200 metres above sea level (masl) to 1,900 masl. The tree line is at 1,630 masl elevation. The Project location features highly variable terrain with slopes ranging from gentle to steep, surrounded by broad valley bottoms.

The regional climate in the vicinity of the Project is considered subarctic, based on cool summers (at least one month, but no more than three months where the average temperature is +10 degrees Celsius [°C]), and cold winters (where the coldest month must have an average temperature below 3°C), with year-round precipitation that is equal in the summer and winter (Kottek et al. 2006).

The closest long-term weather station near the Project is approximately 30 km to the northeast (ENV 2024). From 1989 to 2020, the daily average temperature was 1.3°C, with January being the coldest month (-14.0°C) and July the warmest month (+11.1°C). Extreme temperatures ranged from -44.6°C (January 17, 2012) to 30.9°C (July 13, 2014) (ENV 2024).

The Toodoggone River and Metsantan Creek watersheds separate the Lawyers and Ranch sites, and the Project is therefore situated within two watersheds:

- Lawyers Site components lie within Lawyers and Notary Creek watersheds, which discharge north to the Toodoggone River; and
- Ranch Site components lie within the Moyez and Metsantan Creek watersheds, which discharge into the Stikine River.

8.2.2 Biophysical Feasibility Studies

Three main ecosystems overlap the Project: the alpine, sub-alpine, and forested lower elevation (Chu Cho Environmental LLP & EcoLogic Consultants Ltd 2024a, 2024b, 2024c). The Project predominantly occupies the sub-alpine and alpine ecosystems. The alpine commonly comprises grasslands on mesic sites, dwarf shrub tundra on drier sites, lichen tundra on dry bedrock, heathers on late-season snowmelt or cool aspects, herbaceous meadows in moisture-receiving areas, and willow shrub communities along streambanks and wet sites (Chu Cho Environmental LLP & EcoLogic Consultants Ltd 2024a, 2024b, 2024c). Wetlands are uncommon, and non-vegetated areas include fellfields, rock outcrops, and talus slopes. Common alpine species include mountain sagewort (*Artemisia norvegica*), dwarf birch (*Betula glandulosa*), graceful mountain sedge (*Carex podocarpa*), four-angled mountain heather (*Cassiope tetragona*), reindeer lichens (*Cladina spp.*), entire-leaved mountain-avens (*Dryas integrifolia*), crowberry (*Empetrum nigrum*), Altai fescue (*Festuca altaica*), arctic lupine (*Lupinus arcticus*), arctic willow (*Salix arctica*), creeping willow (*Salix stolonifera*), polar willow (*Salix polaris*), and net-veined willow (*Salix reticulata*) (Chu Cho Environmental LLP & EcoLogic Consultants Ltd 2024a, 2024b, 2024c).

The sub-alpine is a transitional ecosystem between alpine and forested areas, where conditions are not consistently suitable for conifer growth. Trees are often stunted, widely dispersed, or form clumps of tree islands surrounded by herbaceous meadows, heaths, and low-growing shrubs. Grasslands and herb meadows are interspersed among shrub communities with common species such as creeping willow, crowberry, heathers, Altai fescue, mountain sagewort, red-stemmed feathermoss (*Pleurozium schreberi*), reindeer lichens, and foam lichens (*Stereocaulon spp.*).

The forested lower elevation ecosystem is typically found at elevations between approximately 1,100 masl to 1,500 masl and is dominated by lodgepole pine (Pinus contorta var. latifolia), reindeer lichens, and foam lichens. White spruce (Picea glauca) forest with sparsely dominated shrub layer is common (DeLong 2004).

A search of BC's Conservation Data Centre (CDC) spatial data (BC Gov. 2025a) identified 49 plant and lichen species with provincial conservation designation (i.e., red or blue-listed) in the relevant Project study area. of Lawyers and Ranch (Table C-1 of Appendix C). During field surveys, rare plants and lichens were discovered within the Lawyers and Ranch sites. Currently, there are five provincially blue-listed species and one provincially red-listed species. They include one vascular plant, the two spiked moonwort (*Botrychium paradoxum)*, several bryophytes, including pale pincerwort (*Fuscocephaloziopsis leucantha),* polar brook moss (*Hygrohypnella polaris),* far-northern haircap moss *(Polytrichum hyperboreum),* bog earwort (*Scapania paludicola* var. *paludicola)* and pale nitrogen moss (*Tetraplodon pallidus).*(Appendix C, Table C-2). Other rare species identified during surveys in 2022, 2023, and 2024 have since been delisted by the BC CDC.

Currently, as of October 2025, there are 20 provincially listed plant and lichen species found within the broader region around the Project (Appendix C, Table C-3). None of the observed species are federal Schedule 1 species under the *Species at Risk Act* (SARA); however, an aerial survey and ground truthing to investigate the presence of whitebark pine (*Pinus abicaulis)* was conducted in 2025 in suitable habitat.

This survey did not locate any whitebark pine individuals. Oxeye daisy (*Leucanthemum vulgare*), classified as a noxious weed in various regions across BC, was found within the broader region around the Project, along with invasive species like common tansy (*Tanacetum vulgare*) and sheep sorrel (*Rumex acetosella*). The area in which the Project is located is home to a variety of wildlife species, including common mammals such as American black bear (*Ursus americanus*), Canada lynx (*Lynx canadensis*), gray wolf (*Canis lupus*), coyote (*Canis latrans*), American marten (*Martes americana*), red fox (*Vulpes vulpes*), short-tailed weasel *(Mustela erminea*), moose (*Alces alces*), American beaver (*Castor canadensis*), porcupine (*Erithizon dorsatum*), red squirrel (*Tamiasciurus hudsonicus*), snowshoe hare (*Lepus americanus*), and hoary marmot (*Marmota caligata*) (BC Gov. 2025a). Field studies have also confirmed the presence of three mammalian species listed under SARA or provincial red list, including grizzly bear (*Ursus arctos*), wolverine (*Gulo gulo*), and woodland caribou (*Rangifer tarandus*) (COSEWIC 2002, 2014a, 2014b).

Acoustic detections in 2022 and 2023 for bat species identified four species of common bats using the area around the Lawyers Site: eastern red bat (*Lasiurus borealis*), hoary bat (*Lasiurus cinereus*), silver-haired bat (*Lasionycteris noctivagens*), and big brown bat (*Eptesicus fuscus*), with the eastern red bat, hoary bat, and silver-haired bat listed as Endangered under SARA (COSEWIC 2023). Little brown myotis (*Myotis lucifugus*), listed as endangered under SARA, was also detected (COSEWIC 2013).

At-risk bird species detected on the Lawyers Site during point counts and stand-watch surveys in 2022 and 2023 included American golden plover (*Pluvialis dominica*), barn swallow (*Hirundo rustica*), northern goshawk (*Accipiter gentilis*), olive-sided flycatcher (*Contopus cooperi*), peregrine falcon (*Falco peregrinus*), red-necked phalarope (*Phalaropus lobatus*), rusty blackbird (*Euphagus carolinus*), short-eared owl (*Asio flammeus*), Smith's longspur (*Calcarius pictus*), Swainson's hawk (*Buteo swainsonii*), horned grebe (*Podiceps auratus*), and lesser yellowlegs (*Tringa flavipes*). Seven of these species are listed as Special Concern or Threatened under SARA (Table C2, Appendix C).

Stand-watch surveys were initiated on the Ranch Site in September 2024 and included observations of merlin (*Falco columbarius*), golden eagle (*Aquila chrysaetos*), common raven (*Corvus corax*), and white-tailed ptarmigan (*Lagopus leucurus*).

Tributaries of the Stikine River and Toodoggone River that flow in the vicinity of the Project have similar fish communities, owing to the widespread headwater exchange in the region following deglaciation (McPhail 2007). Bull trout (*Salvelinus confluentus*) are the only fish species present in most headwater drainages (with the exception of Lawyers Creek, where only rainbow trout [*Oncorhynchus mykiss*] are present). Lower elevation stream reaches contain a more diverse fish community consisting of bull trout (*Salvelinus confluentus*), arctic grayling (*Thymallus arcticus)*, rainbow trout (*Oncorhynchus mykiss*), mountain whitefish (*Prosopium williamsoni*), lake trout (*Salvelinus namaycush)*, and slimy sculpin (*Cottus cognatus*) (Chu Cho Environmental LLP and Palmer 2023, 2024a, 2024b). The only sensitive or vulnerable fish species present in the vicinity of the Project is bull trout; the Pacific population and the South Coast BC population are blue-listed under the provincial conservation status and 'Special Concern' by COSEWIC, but the South Coast BC population is also listed as 'Special Concern' under Schedule 1 of SARA (BC Gov. 2025a; Government of Canada 2025).

Table 8-1 provides a list of fish species captured in waterbodies in the vicinity of Lawyers and Ranch Sites, and identifies if these waterbodies have the potential to interact with the proposed Project infrastructure.

Table 8-1: Fish Capture Results for Waterbodies Associated with the Project

Basin	Waterbody Name	Potential interactions with Project Infrastructure (Yes/No)	Fish Species Present
Stikine River	Moyez Creek	No	Bull Trout, Arctic Grayling, Mountain Whitefish, Longnose Sucker and Burbot (Downstream of Barrier)
Stikine River	Abesti Creek	No	Non-fish Bearing
Stikine River	Metsantan Creek	No	Bull Trout, Arctic Grayling, Mountain Whitefish, Longnose Sucker and Burbot
Stikine River	T1-Metsantan Creek	No	Bull Trout
Stikine River	Tributaries of-T1-Metsantan	Yes (open pits)	Non-fish Bearing
Finlay River	Toodoggone River	No	Arctic Grayling, Burbot, Mountain Whitefish, Lake Whitefish, Round Whitefish, Lake Trout, Largescale Sucker and Slimy Sculpin
Finlay River	Lawyers Creek	No	Bull Trout, Rainbow Trout
Finlay River	Notary Creek	No	Bull Trout, Rainbow Trout
Finlay River	Attorney Creek	Yes	Bull Trout
Finlay River	Caribou Creek	Yes (Tailings Storage Facility)	Bull Trout
Finlay River	East Creek	No	Bull Trout
Finlay River	Cliff Creek	No	Non-fish Bearing
Finlay River	Moosehorn Creek	No	Bull Trout
Finlay River	Antonie Louis Creek	No	Bull Trout
Finlay River	T1- Toodoggone River	No	Bull Trout

Tables C-1, C-2, and C-3 in Appendix C provide a list of wildlife species known to occur in the vicinity of the Project, including their conservation status, as well as a list of fish species known to occur in the area and their conservation status.

8.2.3 Human Environment

The Town of Smithers, BC, is the closest major centre to the Project by air and is located approximately 275 km to the south. Smithers has a population of 5,378 people (Statistics Canada 2021) and provides service coverage for a large portion of northwest BC.

Smithers is located on the Yellowhead Highway (Highway 16) and on the Canadian National Railway main line and is serviced by a regional airport with fixed-wing and helicopter charter companies. The City of Terrace is approximately 200 km west of Smithers along Highway 16, or approximately 96 km in a straight line. Terrace is a community of 12,017 people (Statistics Canada 2021) and is an important hub for supplies and services in the region, with frequent commercial airline connections. The City of Prince George, BC, with a population of 76,708, (Statistics Canada 2021), is located approximately 370 km east of Smithers along Highway 16 and is the primary supply and services hub for northern BC.

The District of Mackenzie is the closest major centre accessible by road, approximately 400 km to the southeast of the Project. Mackenzie is primarily a base for forestry and provides services for logging (District of Mackenzie n.d.). Mackenzie is the closest hospital, by road, and home of the closest Royal Canadian Mounted Police detachment that may service the Project, by road. Mackenzie also provides services for the Mt. Milligan Copper-Gold Mine, located 95 km west of the town. There is a rail line connecting Mackenzie to the Canadian National Railway mainline, providing rail access to the cities of Prince Rupert, BC, and Vancouver, BC. Mackenzie is supported by Prince George, located 180 km to the south.

First Nation communities nearest to the Project include Kwadacha (Fort Ware) approximately 100 km to the east, Tsay Keh Dene 150 km to the southeast, Takla Landing 228 km to the south and Dease Lake, Iskut and Telegraph Creek, all part of the Tahltan Nation Territory, 201 km northwest, 168 km west and 238 km west of the Project respectively.

Thesis will work with First Nations and communities to identify any sensitive or vulnerable economic, social, heritage, or health values that may be affected by the Project.

Thesis continues to engage with Indigenous Nations, the public, and other stakeholders to further identify permanent, seasonal, or temporary residences that may be located in proximity to the Project. Additional information, as available, will be presented within future Project materials.

8.2.4 Heritage and Archaeology

The Project overlaps with the traditional territories of Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation. Related details in the IPD and EP were informed by feedback from these Indigenous Nations and the results of a commissioned ethnohistorical report, which assessed the historical presence of Indigenous peoples in the vicinity of the Project. Thesis' current understanding can be summarized as follows:

- Kwadacha Nation has historical connections to the vicinity of the Project, including ancestral ties to the headwaters of the Toodoggone River.

- Tsay Keh Dene Nation has historical connections to the vicinity of the Project, including ancestral ties to the headwaters of the Toodoggone River.
- Takla Nation has historical connections to the vicinity of the Project, including ancestral ties to the headwaters of the Finlay River through the Nation's Sekani ancestry.
- Tahltan Nation has historical connections to the vicinity of the Project, including ancestral ties to the headwaters of Metsantan Creek through the Tahltan Band and, more recently, the Iskut Band.

A more detailed account of Thesis' understanding of the connections of these Indigenous Nations to the Project is provided in the EP.

Thesis has collaborated with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation in advancing archaeological fieldwork prior to carrying out ground-disturbing exploration activities. The following measures and actions have been implemented to support archaeological investigations on site for the ongoing exploration program:

- Fieldwork is conducted pursuant to an Archaeological Chance Find Procedure (ACFP), which reflects and aligns with standards provided to Thesis by these Indigenous Nations.
- The ACFP is a component of a broader Heritage Resources Protection Plan, which provides a series of best practices for working alongside Indigenous Nations and archaeologists to protect heritage resources.
- Archaeological Overview Assessments have been conducted for both the Ranch and Lawyers sites to evaluate sites of archaeological potential (In Situ 2022, 2023).
- Thesis utilized LiDAR data from its archaeology consultant to supplement the assessment of sites of archaeological potential in 2021.
- Thesis conducts annual field archaeological field investigations prior to ground-altering activities. Opportunities for participation and related funding are made available to support the attendance of representatives from Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation.

These initiatives will be carried forward as the ongoing mineral exploration program continues through the EA. An Archaeological Overview Assessment for mine development will be conducted to support the EAC Application.

9.0 Potential Project Effects

This section explores the potential direct Project interactions with the physical, biological, and human environment, as well as Indigenous Interests. Direct effects are defined as effects that are directly linked to the potential outcome of the interaction between Project components and/or activities and the Valued Components (VCs). The Project is not expected to result in changes to the environment on federal lands, or in a province other than BC, or outside of Canada. The Project is not expected to result in changes to interprovincial or international waters.

9.1 Project Interactions and Effects

Potential interactions of Project components and activities with preliminarily identified VCs are presented in Table 9-1. Studies completed to date that are described in Section 8.2.2 have informed the understanding of project interactions. The components and activities identified in Table 9-1, along with the identified VCs, are preliminary, and reflect common Project elements and VCs that are evaluated for similar types of projects. Project VCs will be evaluated and scoped in collaboration with Indigenous Nations and will be finalized through Process Planning in the final Application Information Requirements (AIR).

The following notes apply to Table 9-1:

- *includes species at risk
- C = Construction
- O = Operations
- CL/PC = Closure and Post-Closure
- X = Direct effects

Table 9-1: Potential Project Interactions

Project Component and/or Activity	Air Quality			Acoustics			Surface Water			Ground water			Soil			Terrain			Vegetation*			Wildlife, including Culturally Valued, Species at Risk and Migratory Birds*			Fish and Fish Habitat*			Social and Economic			Indigenous Nations Culture, Interests, and Rights		
Project Phase	★	o	♦	★	o	♦	★	o	♦	★	o	♦	★	o	♦	★	o	♦	★	o	♦	★	o	♦	★	o	♦	★	o	♦	★	o	♦
Remediation of historical mine area	X			X			X						X			X			X			X						X			X		
Site clearing and preparation (including earthworks, pads and laydowns)	X			X			X			X			X			X			X			X						X			X		
Ground transportation of personnel to and from offsite (highways) and the mine site	X	X	X	X	X	X																X	X	X				X	X	X	X	X	X
Ground transportation of equipment, materials, and other goods to and from offsite (highways) and the mine site (including doré and concentrate transport) and the existing Sturdee Airstrip	X	X	X	X	X	X																X	X	X				X	X	X	X	X	X
Air transportation of personnel, equipment, materials, and other goods to and from the mine site		X			X																								X			X	
Explosives storage and use	X	X		X	X		X	X		X			X	X																			
Construction, activation, upgrade, and use of onsite road infrastructure and laydown areas (including mobile vehicle, haul truck, and equipment use)	X	X	X	X	X	X	X	X														X	X	X									
Water management related infrastructure: diversion ditches, collection channels (contact and non-contact water, water treatment plant, potable water treatment plant, water reclaim, and non-contact water management, and groundwater wells)				X	X	X	X	X	X	X	X	X	X			X									X								

Project Component and/or Activity	Air Quality			Acoustics			Surface Water			Ground water			Soil			Terrain			Vegetation*			Wildlife, including Culturally Valued, Species at Risk and Migratory Birds*			Fish and Fish Habitat*			Social and Economic			Indigenous Nations Culture, Interests, and Rights		
Project Phase	★	O	♦	★	O	♦	★	O	♦	★	O	♦	★	O	♦	★	O	♦	★	O	♦	★	O	♦	★	O	♦	★	O	♦	★	O	♦
Onsite buildings (including administrative offices, accommodations complex, ancillary facilities, onsite utilities, bulk fuel storage and distribution, and other buildings not used for mining processes)	X			X	X																												
Mine processing infrastructure and buildings (including conveyors, crusher, processing plant, and ore and concentrate storage)	X	X		X	X																						X			X		
Potential transmission line extension corridor													X						X									X			X		

Notes:

*including species at risk

★ = Construction

O = Operations

♦ = Closure and Post Closure

X = Direct effects

The Project's potential effects, both negative and positive, will be identified and assessed during subsequent phases of the EA process, starting with issues scoping and the identification of VCs through collaboration and engagement with Indigenous Nations, the public, and government.

Potential Project-related effects on VCs will be considered, along with mitigation measures to reduce, avoid, or offset potential effects. Thesis has been proactively planning the Project to avoid or reduce many potential Project-related effects in collaboration with Indigenous Nations; for example, by reducing the Project footprint, monitoring and mitigating impacts to caribou and other wildlife, and advancing a native seed and stem (restoration) initiative (see Section 2.1.1).

The Project is not expected to result in changes to the environment on federal lands, or in a province other than BC, or outside of Canada. The Project is not expected to result in changes to interprovincial or international waters.

Thesis is committed to the continued identification, assessment, and mitigation of potential Project-related effects and collaborating closely with Indigenous Nations and other stakeholders most likely to be affected by the Project. A preliminary list of identified Project-related potential effects is provided in Table 9-2.

Table 9-2: Preliminary List of Potential Project Effects

Topic	Potential Project Effects
Air quality	• Changes in dust • Changes in particulate matter • Changes in air quality
Acoustics	• Changes in noise levels at site. • Changes in noise levels along haul roads
Surface water	• Changes to surface water • Changes to sediment quality • Changes to stream flows
Groundwater	• Changes to groundwater quality • Changes to groundwater quantity
Soil	• Changes to soil quality • Changes to soil quantity
Landscape and Terrain	• Changes to local landscape features • Changes to topography
Vegetation	• Changes to plant species and communities of interest • Changes to wetland functions Changes to ecosystems

Topic	Potential Project Effects
Wildlife, Including Culturally Valued, Species at Risk and Migratory Birds	• Loss or alteration of wildlife habitat (direct loss and indirect loss resulting from sensory disturbance) • Changes to wildlife health • Changes to mortality risk • Changes to seasonal habitat use, including use by migratory birds and species at risk
Fish and Fish Habitat, Including Aquatic Species at Risk	• Changes to instream and riparian habitats • Changes in water flows and quality • Changes to fish health
Social and Economic	• Changes to community wellbeing and social determinants of health • Changes in the quality and quantity of resources • Changes to access to the land • Changes to local employment and contracting opportunities • Changes to labour income • Changes to regional economy • Changes to sites of historical, archaeological, or cultural importance • Changes to community infrastructure and services resulting from regional use by the workforce and to support the Project • Changes to transportation and infrastructure
Indigenous Nations Culture, Interests, and Rights	• Changes to community wellbeing and social determinants of health • Changes in the quality and quantity of resources including fish, wildlife, vegetation, or ecosystems of cultural value • Changes to access to the land • Changes to connection with land, culture and community, including peaceful enjoyment of the land • Changes to local employment and contracting opportunities • Changes to labour income • Changes to regional economy • Changes to physical and cultural heritage • Changes to the current use of lands and resources for traditional purposes • Changes to any structure, site, or thing that is of historical, archaeological, paleontological, or architectural significance • Changes to ability to exercise Aboriginal Rights and Title • Changes to locations of historical, archaeological, or cultural importance

Each First Nation – Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation and Tahltan Nation - will be assessed in line with Section 10 of the BC EAO AIR Guidelines (July 2025). The scope of each assessment and identification of Indigenous interests will be advanced collaboratively and based on engagement outcomes with the individual nations.

9.2 Potential Cumulative Effects

As outlined in the EAO Effects Assessment Policy (EAO 2020), a cumulative effects assessment is conducted for VCs where residual adverse effects are anticipated. Cumulative effects arise from the combined impacts of past, present, and potential future human activities. Where identified potential adverse residual effects on a VC are identified in the EAC Application, they will be carried forward along with identified projects or activities that may contribute to them. The EA will consider these residual effects in the context of other past, present, or reasonably foreseeable projects (projects currently undergoing EA, are in the permitting process, or have publicly been announced with a start date) and activities within the Project's vicinity (EAO 2020).

Relevant spatial boundaries and reasonably foreseeable projects that will inform the cumulative effects assessment will be identified through engagement efforts and confirmed in Process Planning.

A preliminary list of projects and activities in the area that may act cumulatively with potential Project-related effects include:

- Ongoing forestry operations.
- Ongoing or reasonably foreseeable mining operations (e.g., Centerra Gold Inc.'s Kemess Mine).
- Ongoing and reasonably foreseeable activities at the Sturdee Airstrip.
- Ongoing and reasonably foreseeable commercial hunting and recreational activities.
- Ongoing and reasonably foreseeable roads, transmission lines, or other infrastructure associated with forestry and mining operations.

10.0 Malfunctions and Accidents

Unplanned events may arise during any Project phase, and may result in effects to the environment, economic, social, cultural or health values, and Indigenous interests. The EAC Application will assess potential risks of malfunctions and accidents and identify risk management measures and other potential mitigation measures.

Potential malfunctions or accidents associated with the Project that may occur include:

- Environmental incidents (including spills or the release of contaminants into the environment);
- Slope failure of WRSFs;
- TMF failure;
- Accidents relating to the use of explosives;
- Vehicle incidents; and
- Fire.

Further scoping of the assessment of malfunctions and accidents will be identified with the development of and engagement on the AIR. As the Project advances, Thesis intends to engage with Indigenous Nations, the TAC, and regulators to identify key interests and opportunities for engagement on this topic.

Engineering controls and mitigation measures will be developed and applied to minimize the likelihood of a potential malfunction or accident from occurring, as scoped through the AIR. Processes and procedures, guided by industry best practices and standards, will be developed to guide the safe and responsible construction and operation of the Project. Outreach and communication protocols will be put into place to inform Indigenous Nations, local governments, and the public of the risks associated with the Project and the controls and mitigations that have been developed to alleviate these risks. It is anticipated that dialogue and engagement with Indigenous groups, local governments, and the public will occur on this topic through the virtual engagement sessions and future co-design workshops, the EA, and the subsequent permitting processes.

11.0 Effects of the Environment on the Project

Environmental factors such as climate change, wildfires, and other natural hazards may affect Project site facilities and operation. These potential effects could include short-term impacts to site access, infrastructure and operations, and personnel health and safety. Project planning and design considers these potential environmental factors to reduce risks to the Project and mitigate adverse effects through design measures, available technologies, environmental management plans, and best practices and standards. Effects of the environment on the Project will be explored further throughout the EA process, Project design, and future engagement activities.

The Project may be affected by the following natural hazards:

- Seismic events; and
- Potential extreme short-term weather and weather-related events, such as:
  - Extreme precipitation;
  - Flooding;
  - Drought (e.g., water availability, power supply risk);
  - Extreme temperature fluctuation; and
  - Extreme heat (e.g., forest fires risk) and cold.

The Project may be affected by long-term trends of climate change, which could have adverse effects on operations, health and safety, infrastructure, and water supply and management. Examples of possible climate change trends include changing temperature and precipitation. Changing temperature, precipitation, and associated potential drought conditions could lead to an increased potential for and intensity of wildfires.

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Appendix A. Thesis Gold Mineral Claims

Table A-1: Thesis Gold Mineral Claims

Claim Number	Claim Name	Property (Area)	Owner	Expire Date	Area (ha)
383411	WO 1	Lawyers	Thesis Gold Inc.	12/31/2035	25.00
383412	WO 2	Lawyers	Thesis Gold Inc.	12/31/2035	25.00
383414	WO 4	Lawyers	Thesis Gold Inc.	12/31/2035	25.00
383417	WO 7	Lawyers	Thesis Gold Inc.	12/31/2035	25.00
389432	SHOTGUN 4	Lawyers	Thesis Gold Inc.	12/31/2035	25.00
389433	SHOTGUN 5	Lawyers	Thesis Gold Inc.	12/31/2035	25.00
389435	SHOTGUN 7	Lawyers	Thesis Gold Inc.	12/31/2035	25.00
389436	SHOTGUN 8	Lawyers	Thesis Gold Inc.	12/31/2035	25.00
506499	LAW 1	Lawyers	Thesis Gold Inc.	12/31/2035	419.15
506501	LAW 2	Lawyers	Thesis Gold Inc.	12/31/2035	437.07
510068	N/A	Lawyers	Thesis Gold Inc.	12/31/2035	69.93
510069	N/A	Lawyers	Thesis Gold Inc.	12/31/2035	69.91
510070	N/A	Lawyers	Thesis Gold Inc.	12/31/2035	52.42
510071	N/A	Lawyers	Thesis Gold Inc.	12/31/2035	419.26
510072	N/A	Lawyers	Thesis	12/31/2035	87.37
510073	N/A	Lawyers	Thesis	12/31/2035	69.89
510074	N/A	Lawyers	Thesis	12/31/2035	366.78
510075	N/A	Lawyers	Thesis	12/31/2035	104.85
510076	N/A	Lawyers	Thesis	12/31/2035	769.17
510077	N/A	Lawyers	Thesis	12/31/2035	436.72
510078	N/A	Lawyers	Thesis	12/31/2035	541.39
510079	N/A	Lawyers	Thesis	12/31/2035	419.38
510080	N/A	Lawyers	Thesis	12/31/2035	698.2
510081	N/A	Lawyers	Thesis	12/31/2035	523.6
510082	N/A	Lawyers	Thesis	12/31/2035	122.24
510083	N/A	Lawyers	Thesis	12/31/2035	244.44
510084	N/A	Lawyers	Thesis Gold Inc.	12/31/2035	69.86
510185	N/A	Lawyers	Thesis Gold Inc.	12/31/2035	69.87
514101	N/A	Lawyers	Thesis Gold Inc.	12/31/2035	489.45
517518	WO FRACTION	Lawyers	Thesis Gold Inc.	12/31/2035	244.82
517521	BISHOP FRACTION	Lawyers	Thesis Gold Inc.	12/31/2035	174.86
517522	ATTORNEY CREEK	Lawyers	Thesis Gold Inc.	12/31/2035	296.99

Claim Number	Claim Name	Property (Area)	Owner	Expire Date	Area (ha)
517525	FRACTION	Lawyers	Thesis Gold Inc.	12/31/2035	17.49
517527	STEALTH FRACTION	Lawyers	Thesis Gold Inc.	12/31/2035	244.36
845896	SILVER POND EXTENSION	Lawyers	Thesis Gold Inc.	12/31/2035	384.05
1038113	MARMOT LAKE	Lawyers	Thesis Gold Inc.	12/31/2035	839.32
1038114	ACCESS ROAD	Lawyers	Thesis Gold Inc.	12/31/2035	977.16
1065737	LAWYERS STH1	Lawyers	Thesis Gold Inc.	12/31/2035	874.96
1065738	LAWYERS STH2	Lawyers	Thesis Gold Inc.	12/31/2035	874.78
1066624	LAWYERS STH3	Lawyers	Thesis Gold Inc.	12/31/2035	525.19
1068270	LAWYERS STH4	Lawyers	Thesis Gold Inc.	12/31/2035	752.81
1072723	LAWYERS STH5	Lawyers	Thesis Gold Inc.	12/31/2035	875.72
1072724	LAWYERS WEST1	Lawyers	Thesis Gold Inc.	12/31/2035	279.5
1072726	LAWYERS STH6	Lawyers	Thesis Gold Inc.	12/31/2035	174.97
1072727	LAWYERS STH7	Lawyers	Thesis Gold Inc.	12/31/2035	17.51
1074384	LAWYERS CONNECTOR	Lawyers	Thesis Gold Inc.	12/31/2035	157.03
528847	ALBERTS NORTHEAST 5	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	416.96
1034604	MET	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	34.83
1034837	N/A	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	296.18
1034838	N/A	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	313.53
1034839	N/A	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	87.12
1034840	N/A	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	52.29
1034979	N/A	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	34.83
1038115	RANCH 1	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	834.25
1038116	RANCH 2	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	486.75
1038117	RANCH 3	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	834.57
1038118	RANCH 4	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	782.30

Claim Number	Claim Name	Property (Area)	Owner	Expire Date	Area (ha)
1038119	RANCH 5	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	974.24
1038120	RANCH 6	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	521.59
1038121	RANCH 7	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	1,026.98
1038122	RANCH 8	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	783.19
1038123	RANCH 9	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	1,149.00
1038124	RANCH 10	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	713.19
1038125	RANCH 11	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	643.48
1038126	RANCH 12	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	626.66
1038127	RANCH 13	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	833.87
1038128	RANCH 14	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	833.89
1038129	RANCH 15	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	1,251.36
1038130	RANCH 16	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	782.78
1038133	RANCH 17	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	121.86
1038134	RANCH 18	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	313.46
1038135	RANCH 19	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	1,481.86
1038136	RANCH 20	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	886.12
1038137	RANCH 21	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	278.81
1038139	RANCH 22	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	278.48
1038140	RANCH 23	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	139.27
1066279	QU15	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	17.43

Claim Number	Claim Name	Property (Area)	Owner	Expire Date	Area (ha)
1066280	QU14	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	69.7
1070370	METS	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	17.42
1074333	N/A	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	17.42
1074335	N/A	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	34.85
1074376	N/A	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	17.42
1099912	RANCH N1	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	555.16
1099922	RANCH N2	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	1,040.49
1101084	RANCH N3	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	970.59
1103303	RANCH NW2	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	972.96
1103304	RANCH NW 3	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	624.93
1103305	RANCH NW 1	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	747.57
1103306	RANCH NW 4	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	1,041.57
1108052	STICK CLAIM	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	416.24
1108053	TAN 20	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	312.47
1108054	FM	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	538.29
1108055	FM2	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	746.46
1108058	N/A	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	208.38
1108059	TAN21	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	69.47
1108062	FM4	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	69.45
1108065	FM3	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	17.37

Claim Number	Claim Name	Property (Area)	Owner	Expire Date	Area (ha)
1108067	N/A	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	17.35
1108068	N/A	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	17.35
1108069**	NAT1	Ranch	Thesis Gold (Holdings) Inc.	10/13/2024	121.25
1108075	FM5	Ranch	Thesis Gold (Holdings) Inc.	4/11/2035	485.98
1119205**	thesis SL	Ranch	Thesis Gold (Holdings) Inc.	1/22/2026	34.69
Total					41,267.63

Appendix B. Existing Conditions Studies

Table B-1: Existing Conditions Studies Undertaken for the Project

Subject Area	Year(s)	Property	Existing Conditions Program	Study Activities
Air Quality and Climate	2021-2024	Lawyers	Meteorology	Two meteorological stations have been established on the Lawyers property. The valley station was set up in September 2021 and the alpine station was setup in September 2022. Data collection is ongoing. Future anticipated study of meteorological modelling for input for atmospheric dispersion modelling.
	2022-2024	Ranch	Meteorology	One meteorological station was set up in 2022 on the Ranch property. Data collection is ongoing. Anticipated study of meteorological modelling for anticipated input for atmospheric dispersion modelling.
	2021-2022	Lawyers	Air Quality	Passive data collection. Anticipated study of atmospheric dispersion modelling.
	2024-2025	Ranch	Air Quality	Passive data collection. Anticipated study of atmospheric dispersion modelling.
Noise	2021-2022	Lawyers	Noise	An existing conditions study was started in 2021 and was completed in 2022.
	2024-2025	Ranch	Noise	An existing conditions study commenced in 2024 and will wrap up in 2025.
Surface Water	2021 – present ongoing	Lawyers	Surface Water Quality	Monthly sampling for two years with two 5-in-30 sample sets collected during spring freshet, and with ongoing quarterly sample collection.
	2023 – present ongoing	Ranch	Surface Water Quality	Monthly for two years with two 5-in-30 sample sets collected during spring freshet, and with ongoing quarterly sample collection.
	2021 – present ongoing	Lawyers	Hydrology	Monthly for two years with increased monitoring frequency coinciding with the two water quality 5-in-30 sampling programs during spring freshet, and with ongoing quarterly sample collection.
	2023 – present ongoing	Ranch	Hydrology	Monthly for two years with increased monitoring frequency coinciding with the two water quality 5-in-30 sampling programs during spring freshet
Ground Water	2022-2024	Lawyers	Hydrogeology	• Quarterly groundwater quality sampling for the 2022 and 2023 monitoring wells. • Datalogger installed in the 2022 and 2023 hydrogeology monitoring wells.
	2023-ongoing	Ranch	Hydrogeology	• Groundwater quality. • Quarterly groundwater sampling for the 2022 and 2023 monitoring wells. • Groundwater quantity. • Datalogger installed in the 2023 and 2024 hydrogeology monitoring wells.
Terrain and Soils	2022-2024	Lawyers	Soils and Terrain	• Field studies including detailed site, soil, and vegetation data using FS882 and FS1333 field cards, as outlined in Describing Ecosystems in the Field. • Soil samples were collected for existing conditions metal analysis. • Planned field studies within the Project Footprint in 2025.
	2024-2025	Ranch		• Field studies provide detailed site, soil, and vegetation data using FS882 and FS1333 field cards, as outlined in Describing Ecosystems in the Field. Field assessments include extensive observations and data collection regarding site characteristics, terrain stability, and soil types. • Additionally, soil samples were collected for existing conditions metal analysis. • Field studies occurred in August 2024 Project LSA. • Anticipated field studies are to occur within the Project Footprint in 2025.

Subject Area	Year(s)	Property	Existing Conditions Program	Study Activities
Archaeology	2022-ongoing	Lawyers	Archaeological Overview Assessment	An Archaeological Overview (AOA) Assessment was conducted via desktop review to assess archaeological potential within the Lawyers Site mineral tenure.
	2021-ongoing	Ranch	Archaeological Overview Assessment	An Archaeological Overview (AOA) Assessment was conducted via desktop review to assess archaeological potential within the Ranch Site mineral tenure.
Ecosystems and Vegetation	2022-2024	Lawyers	Terrestrial Ecosystem Mapping	• Field studies conducted in August 2021, July, August and September 2023 to provide detailed site, soil, and vegetation data using FS882 and FS1333 field cards, as outlined in Describing Ecosystems in the Field. Field assessments include extensive observations and data collection regarding site characteristics, plant species, and site series classification. • Plant samples were collected for existing conditions metal analysis. • Planned field studies are to occur within the Project Footprint in 2025.
	2024-2025	Ranch	Terrestrial Ecosystem Mapping	• Field studies provide detailed site, soil, and vegetation data using FS882 and FS1333 field cards, as outlined in Describing Ecosystems in the Field. Field assessments include extensive observations and data collection regarding site characteristics, plant species, and site series classification. • Additionally, plant samples were collected for existing conditions metal analysis. • Field studies have occurred in August 2024 within the Project LSA. • Anticipated field studies are to occur within the Project Footprint in 2025.
	2023	Lawyers	Predictive Ecosystem Mapping	Field surveys were conducted in 2024 to train and validate the PEM model. Broad PEM categories were recorded.
		Ranch	Predictive Ecosystem Mapping	
	2022-2023	Lawyers	Rare Plants	Field surveys were conducted in June and August of 2022 and 2023 with a focus on the LSA. Surveys adhered to the intuitive-meander protocol outlined in RISC standards. Plant species encountered were recorded, and rare plants and lichens detected were described in detail.
	2024-2025	Ranch		Field surveys were conducted in August 2024 with a focus on the LSA. Surveys adhered to the intuitive-meander protocol outlined in RISC standards. Plant species encountered were recorded, and rare plants and lichens detected were described in detail. Anticipated field studies are to occur within the LSA and the Project Footprint in 2025.
Fish and Fish Habitat	2021-2023	Lawyers	Aquatic Resources	Fall field work in 2021, 2022, and 2023 for collection of sediment, periphyton, and benthic invertebrate samples.
	2023-ongoing	Ranch	Aquatic Resources	Fall field work in 2023, and 2024 for collection of sediment, periphyton, and benthic invertebrate samples.
	2021-2024	Lawyers	Fish and Fish Habitat	Field work in 2021, 2022, 2023, and 2024 for abundance monitoring, fish distribution, habitat assessment and habitat evaluation procedure.
	2023-ongoing	Ranch	Fish and Fish Habitat	Field work in 2023 and 2024 for abundance monitoring, fish distribution, habitat assessment and habitat evaluation procedure.

Subject Area	Year(s)	Property	Existing Conditions Program	Study Activities
Wildlife and Wildlife Habitat	2022, 2023	Lawyers	Wildlife and Wildlife Habitat	• Wildlife Trail Camera Deployment. • Ultrasonic Bat Detector Deployment. • Stand watch Surveys for Migratory Raptors. • Breeding Bird Surveys. • Amphibian Surveys. • Small mammal live trapping. • Habitat modelling for: • Wolverine, • Grizzly Bear, • Moose, • Mountain Goat, and • Stone's Sheep Woodland Caribou.
Wildlife and Wildlife Habitat	2023, 2024, 2025, 2026	Ranch	Wildlife and Wildlife Habitat	• Wildlife Trail Camera Deployment. • Ultrasonic Bat Detector Deployment. • Stand watch Surveys for Migratory Raptors. • Amphibian Surveys. • Breeding Bird Surveys. • Small mammal live trapping. • Habitat modelling for: • Wolverine, • Grizzly Bear, • Moose, • Mountain Goat, • Stone's Sheep, and • Woodland Caribou.

Appendix C. Species of Concern (Plants, Wildlife, Fish)

Table C-1: Rare Plant and Lichen species with Potential to Occur in the Vicinity of the Project

Scientific Name	Common Name	Provincial Ranking[a]	BC List[b]	COSEWIC[c]	SARA[d]
Anaptychia crinalis	electrified millepede	S2? (2019)	Red	—	—
Arctoparmelia separata	Arctic ring	S3 (2019)	Blue	—	—
Arctophila fulva	pendantgrass	S3 (2019)	Blue	—	—
Artemisia alaskana	Alaskan sagebrush	S2S3 (2019)	Blue	—	—
Astragalus laxmannii var. tananaicus	Laxmann's milk-vetch	SU (2020)	Unknown	—	—
Callitriche heterophylla var. heterophylla	two-edged water-starwort	SU (2020)	Unknown	—	—
Cherleria arctica	Arctic sandwort	S2S3 (2022)	Blue	—	—
Chrysosplenium wrightii	Wright's golden-saxifrage	S2S3 (2019)	Blue	—	—
Cladonia cyanipes	blue-footed pixie	S2S4 (2010)	Blue	—	—
Collema ceraniscum	pincushion tarpaper	S3 (2019)	Blue	—	—
Cornus suecica	dwarf bog bunchberry	S2S3 (2019)	Blue	—	—
Dermatocarpon intestiniforme	quilted stippleback	S2S3 (2019)	Blue	—	—
Descurainia sophioides	northern tansymustard	SU (2019)	Unknown	—	—
Diapensia obovata	diapensia	S3 (2019)	Blue	—	—
Douglasia gormanii	Gorman's douglasia	S2S3 (2019)	Blue	—	—
Draba ventosa	Wind River draba	S2S3 (2019)	Blue	—	—
Epilobium davuricum	northern swamp willowherb	SH (2019)	Red	—	—
Erigeron uniflorus var. eriocephalus	northern daisy	SH (2019)	Red	—	—
Geum rossii	Ross' avens	S3 (2019)	Blue	—	—
Haplodontium macrocarpum	Porsild's bryum	S1 (2015)	Red	T	1-T

Scientific Name	Common Name	Provincial Ranking[a]	BC List[b]	COSEWIC[c]	SARA[d]
Masonhalea richardsonii	Arctic tumbleweed	S3 (2010)	Blue	—	—
Micranthes razshivinii	large-petalled saxifrage	S2S3 (2019)	Blue	—	—
Montia bostockii	Bostock's montia	S3 (2019)	Blue	—	—
Nephroma isidiosum	pebbled paw	S3 (2010)	Blue	—	—
Oxytropis campestris var. jordalii	Jordal's locoweed	S3? (2018)	Blue	—	—
Oxytropis nigrescens var. uniflora	one-flower oxytrope	SU (2020)	Unknown	—	—
Parrya nudicaulis	northern parrya	SH (2015)	Red	—	—
Penstemon gormanii	Gorman's penstemon	S3? (2019)	Blue	—	—
Phaeophyscia ciliata	greater eye shadow	S3 (2019)	Blue	—	—
Physconia detersa	bottlebrush frost	S2? (2019)	Red	—	—
Pinus albicaulis	whitebark pine	S2S3 (2019)	Blue	E	1-E
Poa pseudoabbreviata	polar bluegrass	S2S3 (2019)	Blue	—	—
Polemonium boreale	northern Jacob's-ladder	SU (2023)	Unknown	—	—
Polygonum humifusum ssp. caurianum	Alaska knotweed	S2S3 (2019)	Blue	—	—
Potentilla biflora	two-flowered cinquefoil	S3 (2019)	Blue	—	—
Potentilla elegans	elegant cinquefoil	S2S3 (2019)	Blue	—	—
Primula cuneifolia ssp. saxifragifolia	wedge-leaf primrose	S3 (2019)	Blue	—	—
Ranunculus sulphureus	sulphur buttercup	S3 (2019)	Blue	—	—
Salix raupii	Raup's willow	SH (2019)	Red	—	—
Saussurea angustifolia var. angustifolia	northern sawwort	SH (2015)	Red	—	—

Scientific Name	Common Name	Provincial Ranking[a]	BC List[b]	COSEWIC[c]	SARA[d]
Saxifraga hirculus	yellow marsh saxifrage	S3 (2019)	Blue	—	—
Tephroseris frigida	purple-haired groundsel	S3 (2019)	Blue	—	—
Tephroseris lindstroemii	northern groundsel	S3 (2019)	Blue	—	—
Tephroseris palustris	marsh fleabane	S3? (2022)	Blue	—	—
Tephroseris yukonensis	Yukon groundsel	S3 (2019)	Blue	—	—
Umbilicaria aprina	tentacled rocktripe	S3? (2010)	Blue	—	—
Umbilicaria lyngei	puckered rocktripe	S3 (2010)	Blue	—	—
Utricularia ochroleuca	ochroleucous bladderwort	S2S3 (2019)	Blue	—	—
Woodsia alpina	alpine cliff fern	SU (2019)	Unknown	—	—

Notes:

a Provincial Ranking Codes: S1 = critically imperiled; S2 = imperiled; S3 = special concern, vulnerable to extirpation or extinction; SH = historical; = uncertainty

b BC List: Blue = Special Concern; Red = Candidates for Extirpated, Endangered or Threatened status in BC

c COSEWIC = Committee on the Status of Endangered Wildlife in Canada; E = Endangered; T = Threatened

d SARA = Species at Risk Act; 1-E = Schedule 1 Endangered; 1-T = Schedule 1 Threatened

Source: BC Gov (2025a).

Table C-2: Red or Blue Listed Plant and Lichen Species Observed in the Vicinity of the Project

Scientific Name	Common Name	Plant Type	2025 Provincial Ranking	2025 BC List	Observed in Lawyers LSA	Observed in Ranch LSA
Botrychium paradoxum	two-spiked moonwort	Vascular plant	S3? (2019)	Blue		X
Fuscocephaloziopsis leucantha	pale pincerwort	Liverwort	S3 (2021)	Blue	X	
Hygrohypnella polaris	polar brook feathermoss	Moss	S3? (2024)	Blue	X	
Polytrichum hyperboreum	far-northern haircap moss	Moss	S2S3 (2024)	Blue	X	X
Scapania paludicola var. paludicola	bog earwort	Liverwort	S2 (2021)	Red	X	
Tetraplodon pallidus	pale nitrogen moss	Bryophyte	S2S3 (2024)	Blue		X

Notes:
LSA = Local study area, X = species present at this location.
Data in table updated to the 2025 species rankings.
Source: (BC Gov. 2025a, Chu Cho Environmental LLP and EcoLogic Consultants Ltd 2024b)

Table C-3: Plant and lichen species observed in the Regional Study Area

Scientific Name	Common Name	Plant Type	2025 Provincial Ranking	2025 BC List
Arctoparmelia subcentrifuga	abrading ring lichen	Lichen	S3 (2019)	Blue
Cephaloziella rubella	red threadwort	Liverwort	S3 (2021)	Blue
Fuscocephaloziopsis leucantha	pale pincerwort	Liverwort	S3 (2021)	Blue
Marchantia polymorpha subsp. montivagans	alpine common liverwort	Liverwort	S3 (2015)	Blue
Nardia geoscyphus	earth-cup flapwort	Liverwort	S3 (2021)	Blue
Pellia epiphylla	overleaf pellia	Liverwort	S2 (2021)	Red
Polytrichum hyperboreum	far-northern haircap moss	Moss	S2S3 (2024)	Blue
Pseudobryum cinclidioides	river thyme moss	Moss	S3? (2024)	Blue
Saccobasis polita	flush brownwort	Liverwort	S2S3 (2021)	Blue
Santessoniella arctophila	Arctic dust-bunnies	Lichen	S1 (2010)	Red
Scapania irrigua ssp. irrigua	sharp earwort	Liverwort	S2 (2021)	Red
Scapania mucronata	sharp earwort	Liverwort	S3 (2021)	Blue
Scapania paludicola var. paludicola	bog earwort	Liverwort	S2 (2021)	Red
Schistidium confertum	compact beard moss	Moss	S3 (2024)	Blue
Schistidium venetum	small beard moss	Moss	S3? (2024)	Blue
Schljakovianthus quadrilobus var. quadrilobus	four-fingered pawwort	Liverwort	S3 (2021)	Blue
Tortula leucostoma	alpine screw moss	Moss	S3? (2024)	Blue
Tritomaria exsectiformis ssp. exsectiformis	large brownwort	Liverwort	S3 (2021) Blue	Blue
Tritomaria scitula	mountain brownwort	Liverwort	S3 (2021) Blue	Blue
Xanthomendoza borealis	Arctic sunburst lichen	Lichen	S1 (2019) Red	Red

Source: BC Gov. (2025a).

Table C-4: Wildlife Species with Potential to Occur in the Vicinity of the Project

Species	Scientific Name	Provincial Ranking[1]	BC Rank List[2]	COSEWIC[3] Status	SARA[4] Status
Birds					
Alder Flycatcher	*Empidonax alnorum*	S5B	Yellow	—	—
American Bittern	*Botaurus lentiginosus*	S3B, SNRN	Blue	—	—
American Golden-Plover	*Pluvialis dominica*	S3S4B	Blue	—	—
American Goshawk, *atricapillus* subspecies	*Accipiter atricapillus atricapillus*	S3S4	Blue	NAR	—
American Kestrel	*Falco sparverius*	S4S5B	Yellow	—	—
American Pipit	*Anthus rubescens*	S5B, SNRN	Yellow	—	—
American Robin	*Turdus migratorious*	S5	Yellow	—	—
American Three-toed Woodpecker	*Picoides dorsalis*	S5	Yellow	—	—
American Tree Sparrow	*Spizelloides arborea*	S4B	Yellow	—	—
American White Pelican	*Pelecanus erythrorhynchos*	S1B	Red	NAR	—
American Wigeon	*Mareca americana*	S5B, S5N	Yellow	—	—
Bald Eagle	*Haliaeetus leucocephalus*	S5B, S5N	Yellow	—	—
Band-tailed Pigeon	*Patagioenas fasciata*	S3S4	Blue	SC	1-SC
Barn Swallow	*Hirundo rustica*	S4B	Yellow	SC	1-T
Bay-breasted Warbler	*Setophaga castanea*	S2B	Red	—	—
Barrow's Goldeneye	*Bucephala islandica*	S4S5	Yellow	—	—
Blackpoll Warbler	*Setophaga striata*	S5B	Yellow	—	—
Black-capped Chickadee	*Poecile atricapillus*	S5	Yellow	—	—
Black Swift	*Cypseloides niger*	S2S4B	Blue	E	1-E
Black-throated Green Warbler	*Setophaga virens*	S3B	Blue	—	—
Blue-winged Teal	*Spatula discors*	S4S5B	Yellow	—	—

Species	Scientific Name	Provincial Ranking[1]	BC Rank List[2]	COSEWIC[3] Status	SARA[4] Status
Bohemian Waxwing	*Bombycilla garrulus*	S5	Yellow	—	—
Boreal Chickadee	*Poecile hudsonicus*	S5	Yellow	—	—
Broad-winged Hawk	*Buteo platypterus*	S4?B	Yellow	—	—
California Gull	*Larus californicus*	S1B, SNRN	Red	—	—
Canada Goose	*Branta canadensis*	S5	Yellow	—	—
Canada Jay	*Perisoreus canadensis*	S5	Yellow	—	—
Canada Warbler	*Cardellina canadensis*	S3B	Blue	SC	1-T
Cape May Warbler	*Setophaga tigrina*	S3S4B	Blue	—	—
Cedar Waxwing	*Bombycilla cedrorum*	S5	Yellow	—	—
Chipping Sparrow	*Spizella passerina*	S5B	Yellow	—	—
Clark's Nutcracker	*Nucifraga columbiana*	S5	Yellow	—	—
Clay-coloured Sparrow	*Spizella pallida*	S5B	Yellow	—	—
Cliff Swallow	*Petrochelidon pyrrhonota*	S4S5B	Yellow	—	—
Common Goldeneye	*Bucephala clangula*	S5	Yellow	—	—
Common Loon	*Gavia immer*	S5	Yellow	—	—
Common Nighthawk	*Chordeiles minor*	S3S5B	Blue	SC	1-SC
Common Raven	*Corvus corax*	S5	Yellow	—	—
Common Redpoll	*Acanthis flammea*	S4	Yellow	—	—
Common Yellowthroat	*Geothlypis trichas*	S5	Yellow	—	—
Connecticut Warbler	*Oporornis agilis*	S3S4	Blue	—	—
Double-crested Cormorant	*Nannopterum auritum*	S3S4	Blue	NAR	—
Dark-eyed Junco	*Junco hyemalis*	S5	Yellow	—	—
Dusky Flycatcher	*Empidonax oberholseri*	S5B	Yellow	—	—
Eared Grebe	*Podiceps nigricollis*	S3B	Blue		

Species	Scientific Name	Provincial Ranking[1]	BC Rank List[2]	COSEWIC[3] Status	SARA[4] Status
Evening Grosbeak	*Coccothraustes vespertinus*	S5	Yellow	SC	1-SC
Fox Sparrow	*Passerella iliaca*	S5	Yellow	—	—
Golden Eagle	*Aquila chrysaetos*	S4S5	Yellow	—	—
Golden -crowned Kinglet	*Regulus satrapa*	S5	Yellow	—	—
Golden-crowned Sparrow	*Zonotrichia atricapilla*	S5?B	Yellow	—	—
Gray-cheeked Thrush	*Catharus minimus*	S4S5B	Yellow	—	—
Gray-crowned Rosy-finch	*Leucosticte tephrocotis*	S5?B	Yellow	—	—
Great Blue Heron	*Ardea herodias herodias*	S3	Blue	—	—
Great Grey Owl	*Strix nebulosa*	S4	Yellow	—	—
Greater Yellowlegs	*Tringa melanoleuca*	S4	Yellow	—	—
Green-winged Teal	*Anas crecca*	S5B, S5N	Yellow	—	—
Gyrfalcon	*Falco rusticolus*	S3S4B, SNRN	Blue	NAR	—
Hairy Woodpecker	*Dryobates villosus*	S5	Yellow	—	—
Hermit Thrush	*Catharus guttatus*	S5B	Yellow	—	—
Horned Grebe	*Podiceps auritas*	S4B, SNRN	Yellow	SC	1-SC
Horned Lark	*Eremophilia alpestris*	S3S5	Blue	—	—
Hudsonian Godwit	*Limosa haemastica*	S1B	Red	T	—
Lapland Longspur	*Calcarius lapponicus*	SUN, S5M	Yellow	—	—
Lark Sparrow	*Chondestes grammacus*	S2S4B	Blue	—	—
Least Flycatcher	*Empidonax minimus*	S5B	Yellow	—	—
Least Sandpiper	*Calidrus minutilla*	S4B, S5M	Yellow	—	—
Lesser Scaup	*Aythya affinis*	S5B, S5N	Yellow	—	—
Lesser Yellowlegs	*Tringa flavipes*	S3S4B	Blue	T	—
Lewis's Woodpecker	*Melanerpes lewis*	S2S3B	Blue	T	1-T

Species	Scientific Name	Provincial Ranking[1]	BC Rank List[2]	COSEWIC[3] Status	SARA[4] Status
Lincoln's Sparrow	*Melospiza lincolnii*	S5B, SNRN	Yellow	—	—
Long-tailed Duck	*Clangula hyemalis*	S2S3B, S4N	Blue	—	—
MacGillivray's Warbler	*Geothlypis tolmiei*	S5B	Yellow	—	—
Mallard	*Anas platyrhynchos*	S5B, S5N	Yellow	—	—
Marbled Murrelet	*Brachyramphus marmoratus*	S3	Blue	T	1-T
Merlin	*Falco columbarius*	S5	Yellow	—	—
Mountain Chickadee	*Poecile gambeli*	S5	Yellow	—	—
Nelson's Sparrow	*Ammospiza nelsoni*	S2B	Red	NAR	—
Northern Flicker	*Colaptus auratus*	S5	Yellow	—	—
Northern Harrier	*Circus hudsonius*	S4B	Yellow	NAR	—
Northern Hawk Owl	*Sumia ulula*	S4S5	Yellow	NAR	—
Northern Pintail	*Anas acuta*	S4B, S5N	Yellow	—	—
Northern Shrike	*Lanius borealis*	S4B, S4N	Yellow	—	—
Northern Waterthrush	*Parkesia noveboracensis*	S5B	Yellow	—	—
Olive-sided Flycatcher	*Contopus cooperi*	S4B	Yellow	SC	1-SC
Orange-crowned Warbler	*Leiothlypis celata*	S5B	Yellow	—	—
Osprey	*Pandion haliaetus*	S5B	Yellow	—	—
Ovenbird	*Seiurus aurocapilla*	S5B	Yellow	—	—
Parasitic Jaeger	*Stercorarius parasiticus*	S1B, SUM	Red	—	—
Peregrine Falcon	*Falco peregrinus*	S3	No Status	—	—
Peregrine Falcon, *anatum* subspecies	*Falco peregrinus anatum*	S2?	Red	NAR	—
Pine Grosbeak	*Pinicola enucleator*	S5	Yellow	—	—
Pine Siskin	*Spinus pinus*	S5B	Yellow	—	—
Purple Finch	*Haemorhus purpureus*	S5B	Yellow	—	—
Purple Martin	*Progne subis*	S3S4B	Blue	—	—
Red Crossbill	*Loxia curvirostra*	S5	Yellow	—	—

Species	Scientific Name	Provincial Ranking[1]	BC Rank List[2]	COSEWIC[3] Status	SARA[4] Status
Red-breasted Nuthatch	*Sitta canadensis*	S5	Yellow	—	—
Red-necked Phalarope	*Phalaropus lobatus*	S3B, SNRM	Blue	SC	1-SC
Red-Tailed Hawk	*Buteo jamaicensis*	S5	Yellow	—	—
Red-throated Loon	*Gavia stellata*	S4	Yellow	—	—
Red-winged Blackbird	*Agelaius phoeniceus*	S5B, S5N	Yellow	—	—
Rock Ptarmigan	*Lagopus muta*	S4S5	Yellow	—	—
Rough-legged Hawk	*Buteo lagopus*	S3N	Blue	NAR	—
Ruby-crowned Kinglet	*Corthylio calendula*	S5	Yellow	—	—
Ruby-throated Hummingbird	*Archilochus colubris*	S1B	Red	—	—
Ruffed Grouse	*Bonasa umbrellus*	S5	Yellow	—	—
Rufous Hummingbird	*Selasphorus rufus*	S4?B	Yellow	—	—
Rusty Blackbird	*Euphagus carolinus*	S3S4	Blue	SC	1-SC
Savannah Sparrow	*Passerculus sandwhichensis*	S5B	Yellow	—	—
Say's Pheobe	*Sayornis saya*	S4S5B	Yellow	—	—
Semipalmated Plover	*Charadrius semipalmatus*	S4B	Yellow	—	—
Sharp-shinned Hawk	*Accipiter striatus*	S5B, S5N	Yellow	NAR	—
Short-billed Dowitcher	*Limnodromus griseus*	S1S2B, S2S3M	Red	—	—
Short-billed Gull	*Larus brachyrhynchus*	S4B	Yellow	—	—
Short-eared Owl	*Asio flammeus*	S3B, S1N	Blue	T	1-SC
Smith's Longspur	*Calcarius pictus*	S2S3B	Blue	—	—
Snow Bunting	*Plectrophenax nivalis*	S4?B, S5?N	Yellow	—	—
Solitary Sandpiper	*Tringa solitaria*	S5B	Yellow	—	—
Spotted Sandpiper	*Actitus macularius*	S5B	Yellow	—	—

Species	Scientific Name	Provincial Ranking[1]	BC Rank List[2]	COSEWIC[3] Status	SARA[4] Status
Spruce Grouse	*Canachites candensis*	S5	Yellow	—	—
Surf Scoter	*Melanitta perspicillata*	S3B, S4N	Blue	—	—
Swainson's Hawk	*Buteo swainsonii*	S2B	Red	—	—
Swainson's Thrush	*Catharus ustulatus*	S5B	Yellow	—	—
Tennessee Warbler	*Leiothlypis peregrina*	S5B	Yellow	—	—
Tree Swallow	*Tachycineta bicolor*	S5B	Yellow	—	—
Townsend's Solitaire	*Myadestes townsendi*	S5B	Yellow	—	—
Townsend's Warbler	*Setophaga townsendi*	S5B	Yellow	—	—
Trumpeter Swan	*Cygnus buccinator*	S4B, S5N	Yellow	NAR	—
Turkey Vulture	*Cathartes aura*	S4	Yellow	—	—
Upland Sandpiper	*Bartramia longicauda*	S2B	Red	—	—
Varied Thrush	*Ixoreus naevius*	S5	Yellow	—	—
Wandering Tattler	*Tringa incana*	S3B	Blue	—	—
Western Grebe	*Aechmophorus occidentalis*	S1S2B, S2N	Red	SC	1-SC
Western Screech-Owl	*Megascops kennicottii*	S4	No Status	T	1-T
Western Screech-Owl, *kennicottii* subspecies	*Megascops kennicottii kennicottii*	S2S3	Blue	T	1-T
Western Wood-pewee	*Contopus sordidulus*	S5?B	Yellow	—	—
White-crowned Sparrow	*Zonotrichia leucophrys*	S5	Yellow	—	—
White-tailed Ptarmigan	*Lagopus leucurus*	S5?	Yellow	—	—
White-throated Sparrow	*Zonotrichia albicollis*	S5	Yellow	—	—
White-winged Crossbill	*Loxia leucoptera*	S5	Yellow	—	—
Willow Ptarmigan	*Lagopus lagopus*	S4S5	Yellow	—	—

Species	Scientific Name	Provincial Ranking[1]	BC Rank List[2]	COSEWIC[3] Status	SARA[4] Status
Wilson's Snipe	*Galllinago delicata*	S5	Yellow	—	—
Wilson's Warbler	*Cardellina pusila*	S5B	Yellow	—	—
Winter Wren	*Troglodytes hiemalis*	S3S4B	Blue	—	—
Yellow-bellied Flycatcher	*Empidonax flavivntris*	S4S5B	Yellow	—	—
Yellow-breasted Chat	*Icteria virens*	S2B	Red	E	1-E
Yellow Warbler	*Setophaga petechia*	S5B	Yellow	—	—
Yellow-rumped Warbler	*Setophaga coronata*	S5B	Yellow	—	—
Mammals					
American Beaver	*Castor canadensis*	S5	Yellow	—	—
American Water Shrew	*Sorex palustris*	SU	Unknown	—	—
Black Bear	*Ursus americanus*	S5	Yellow	NAR	—
Big Brown Bat	*Eptesicus fuscus*	S5	Yellow	—	—
Canada Lynx	*Lynx canadensis*	S5	Yellow	NAR	—
Woodland Caribou (Boreal Population)	*Rangifer tarandus*	S2?	Red	T	1-T
Woodland Caribou (Northern Mountain Population)	*Rangifer tarandus*	S2S3	Blue	SC	1-SC
Collared Pika	*Ochotona collaris*	S3	Blue	SC	1-SC
Coyote	*Canis latrans*	S5	Yellow	—	—
Eastern Red Bat	*Lasiurus borealis*	SU	Unknown	E	1-E
Fisher	*Pekania pennanti*	S2S3	No Status	—	—
Gray Wolf	*Canis lupus*	S4S5	Yellow	NAR	—
Grizzly Bear	*Ursus arctos*	S3	Blue	SC	1-SC
Hoary Bat	*Lasiurus cinereus*	S3S4	Blue	E	1-E
Hoary Marmot	*Marmota caligata*	S5	Yellow	—	—
Little brown Myotis	*Myotis lucifugus*	S3S4	Blue	E	1-E

Species	Scientific Name	Provincial Ranking[1]	BC Rank List[2]	COSEWIC[3] Status	SARA[4] Status
Long-eared Myotis	*Myotis evotis*	S4?	Yellow	—	—
Long-legged Myotis	*Myotis volans*	S4?	Yellow	—	—
Meadow Jumping Mouse	*Zapus hudsonius alascensis*	S3	Blue	—	—
Moose	*Alces alces*	S5	Yellow	—	—
Mountain Goat	*Oreamnos americanus*	S3	Blue	—	—
Nearctic Brown Lemming	*Lemmus trimucronatus*	S5	Yellow	—	—
North American Porcupine	*Erithizon dorsatum*	S4S5	Yellow	—	—
Northwestern Deermouse	*Peromyscus keeni*	S5	Yellow	—	—
Northern Myotis	*Myotis septentrionalis*	S2S3	Blue	E	1-E
Northern Red-backed Vole	*Myodes rutilus*	S4S5	Yellow	—	—
Red Fox	*Vulpes vulpes*	S5	Yellow	—	—
Red Squirrel	*Tamiasciurus hudsonicus*	S5	Yellow	—	—
Short-tailed Weasel (Ermine)	*Mustela erminea*	S5	Yellow	—	—
Silver-haired Bat	*Lasionycteris noctivagens*	S4S5	Yellow	E	1-E
Snowshoe Hare	*Lepus americanus*	S5	Yellow	—	—
Stone's Sheep	*Ovis dalli stonei*	S3S4	Blue	—	—
Tundra Shrew	*Sorex tundrensis*	S1S2	Red	—	—
Western Heather Vole	*Phenacomys intermedius*	S5	Yellow	—	—
Wolverine	*Gulo gulo*	S3	Blue	SC	1-SC
Wood Bison	*Bos bison athabascae*	S2	Red	SC	1-T
Amphibians					
Coastal Tailed Frog	*Ascaphus truei*	S4	Yellow	SC	1-SC
Columbia Spotted Frog	*Rana luteiventris*	S4S5	Yellow	NAR	—

Species	Scientific Name	Provincial Ranking[1]	BC Rank List[2]	COSEWIC[3] Status	SARA[4] Status
Long-toed Salamander	*Ambystoma macrodactylum*	S5	Yellow	NAR	—
Western Toad	*Anaxyrus boreas*	S4	Yellow	SC	1-SC
Wood Frog	*Lithobates sylvaticus*	S5	Yellow	—	—

[1]Provincial Ranking Codes: S1 = critically imperiled; S2 = imperiled; S3 = special concern, vulnerable to extirpation or extinction; S4 = Apparently secure, with some cause for concern; S5 = Demonstrably widespread, abundant and secure; SU = Unrankable; SH = historical; ? = uncertainty

[2]BC List: Blue = Special Concern; Red = Candidates for Extirpated, Endangered or Threatened status in BC

[3]COSEWIC = Committee on the Status of Endangered Wildlife in Canada; E = Endangered; T = Threatened

[4]SARA = Species at Risk Act; 1-E = Schedule 1 Endangered; 1-T = Schedule 1 Threatened

Source: BC Gov (2025a).

Table C-5: Listed Fish Species in the Vicinity of Project

Common Name	Scientific Name	BC Rank List	COSEWIC[1] Status	SARA[2] Status
Bull Trout (Western Arctic Population)	*Salvelinus confluentus*	Blue	SC	1-SC (2019)
Bull Trout (Pacific Population)	*Salvelinus confluentus*	Blue	—	—

Notes:
1 Committee on the Status of Endangered Wildlife in Canada (COSEWIC)
2 Species at Risk Act (SARA)
— = species not listed
COSEWIC Status:
SC = Special Concern
SARA Status:
1-SC = Special Concern under Schedule 1

Appendix D. EAO Table of Concordance

D.1. EAO Table of Concordance

Table D-1: EAO Early Engagement Guide Version 2.0, Appendix 1 – IPD Guidelines Table of Concordance: IPD for the Lawyers-Ranch Project

IPD Guidelines Page #	IPD Guidelines Section Title	EAO Early Engagement Guide V2.0 Appendix 1 IPD Information Requirement	IPD Section Title	IPD Section or Location
14	Executive Summary	A plain language summary of the IPD that is clear and concise.	Executive Summary	Pg. iii
14	General Information and Contacts	Project name	Introduction	Section 1.0
14	General Information and Contacts	Project location;	Introduction	Project location within the province is in Section 1.0
14	General Information and Contacts	Project industrial sector and type (e.g., open pit metal mine)	Introduction	Section 1.0
14	General Information and Contacts	Proponent name, mailing address, phone numbers, email address, and website URL. Include the name and contact information of the primary representative for the EA.	Proponent Information	Section 2.0; Table 2-1
14	Purpose and Rationale	A general rationale for why the project has been proposed	Purpose, Rationale, and Benefits of the Project	Section 3.1
14	Purpose and Rationale	Potential project benefits	Purpose, Rationale, and Benefits of the Project	Section 3.1
14	Legislative and Regulatory Context	The type and size of the project, with specific reference to EA Regulatory Triggers [e.g., the EAO Reviewable Project Regulation and Impact Assessment Act (Canada) thresholds (triggers)]	Legislative and Regulatory Context; Federal Impact Assessment Act and Environmental Assessment Act	Section 5.0; Section 5.1

IPD Guidelines Page #	IPD Guidelines Section Title	EAO Early Engagement Guide V2.0 Appendix 1 IPD Information Requirement	IPD Section Title	IPD Section or Location
14	Legislative and Regulatory Context	A list of anticipated authorizations and permits	Existing Permit, Licenses and Approvals; Other Anticipated Provincial and Federal Permits, Licenses and Approvals	Section 3.5, Table 3-6; Section 5.3, Table 5-1, Table 5-2
14	Legislative and Regulatory Context	Consider the requirements of any applicable agreements between the Province and First Nations, including treaties	Indigenous Nation Background and Applicable Agreements	Section 6.2
14	Legislative and Regulatory Context	Consider the requirements of any applicable international agreements between the Province and state or federal governments	Legislative and Regulatory Context; Substitution and Assessment Timing	Section 5.0; Section 5.2
14	Legislative and Regulatory Context	A description of relevant government policies that the project may not be compatible with	Legislative and Regulatory Context	Section 5.0
14	Legislative and Regulatory Context	Proposed timing for conducting the provincial EA and federal EA, if applicable	Project Timing	Section 3.4, Table 3-4
15	Project Status and History	Project history, including past ownership	Project History	Section 3.3
15	Project Status and History	State if it is a new project or a modification to an existing project	Project History	Section 1.0; Section 3.3
15	Project Status and History	A list of any existing permits or tenure in place	Existing Permits, Licenses and Approvals	Section 3.5, Table 3-6
15	Project Status and History	A description of any previous proposal(s) for the project or a similar proposal and the outcomes and history of the proposal(s), if applicable	N/A	N/A

IPD Guidelines Page #	IPD Guidelines Section Title	EAO Early Engagement Guide V2.0 Appendix 1 IPD Information Requirement	IPD Section Title	IPD Section or Location
15	Project Status and History	If the project was previously declined or terminated, a description of how this proposal differs and how the issues for which the previous proposal was declined or terminated have been addressed	N/A	N/A
15	Project Timing	A list of proposed project phases (e.g. construction, operation, decommissioning, and reclamation) and the anticipated timing and duration of each phase	Project Timing	Section 3.4
15	Project Timing	Include any known seasonal timing constraints	Construction Phase	Section 4.3.1
15	Project Location, Activities and Components	A description of the proposed project's location in a local and regional context, including proximity to communities or locations of interest to the public, government, or First Nations, and key designated or protected areas such as parks or Wildlife Habitat Areas	Project Location; Project Existing Conditions Studies	Section 3.2; Section 8.2
15	Project Location, Activities and Components	Proposed project activities and components	Proposed Project Components; Project Phases and Activities	Section 4.2; Table 4-1; Section 4.3; Table 4-2
15	Project Location, Activities and Components	Proposed on and offsite facilities and equipment	Proposed Project Components	Section 4.2, Table 4-1
15	Project Location, Activities and Components	A brief description of proposed activities related to processing, transportation and/or shipping of materials to/from the site	Operation Phase	Section 4.3.2

IPD Guidelines Page #	IPD Guidelines Section Title	EAO Early Engagement Guide V2.0 Appendix 1 IPD Information Requirement	IPD Section Title	IPD Section or Location
15	Project Location, Activities and Components	A description of any other project(s) that are needed for the proposed project to proceed and be feasible (e.g. a pipeline would be needed for an oil and gas facility to proceed)	Indigenous Collaboration in Project Design; Proposed Project Components	Section 2.1.1; Section 4.2, Table 4-1
15	Project Location, Activities and Components	A description of the work that has been conducted to arrive at the proposed project as described in the IPD	Project Design and Planning	Section 4.1
15	Project Location, Activities and Components	A list of design or siting constraints that are flexible and those that are not flexible	Alternative Means for Carrying Out the Project	Section 4.8
15	Project Location, Activities and Components	A list of other design or siting options that may be considered	Alternative Means for Carrying out the Project	Section 4.8, Table 4-6
15	Project Location, Activities and Components	Anticipated daily and annual maximum production or operational capacity of the project (if applicable)	Operation Phase	Section 4.3.2
15	Maps and Shapefiles	Local and regional scale maps of the project showing its location and known offsite components	Introduction; Project Location; Shapefiles provided in separate appended package	Section 1.0; Section 3.2
15	Maps and Shapefiles	Map(s) and shapefile(s) showing the expected area of direct and indirect effects of the project* (*The purpose of this map will be to inform initial engagement with First Nations including clarifying consultation obligations and First Nation participation in the EA process.)	Shapefiles provided in separate appended package	N/A

IPD Guidelines Page #	IPD Guidelines Section Title	EAO Early Engagement Guide V2.0 Appendix 1 IPD Information Requirement	IPD Section Title	IPD Section or Location
15	Maps and Shapefiles	Shapefiles of the proposed project footprint and the footprint of known offsite components. Provide shapefiles demonstrating the overlap of known project components with any identified communities or locations of interest to the public. This may include information regarding specific sites of importance to a First Nation or their territory if this information is not confidential in nature and a First Nation has agreed to allow the information to be shared.	Shapefiles provided in separate appended package	Separate appended package
15	Maps and Shapefiles	Refer to the Spatial Data Submission Standards Guidelines to ensure mapping data is submitted according to the EAO requirements	Shapefiles provided in separate appended package	Separate appended package
16	First Nations	A description of the proximity of the proposed project to First Nations' territory, communities, locations of interest, reserve lands, Treaty lands, etc.	Project Location	Section 3.2, Table 3-2; Table 3-3; Figure 3-2
16	First Nations	A description of potential project interactions with any Section 35 rights or other interests identified by the First Nation	Indigenous Nation Background and Applicable Agreements; Project Interactions and Effects	Section 6.2; Section 9.1, Table 9-2
16	First Nations	A description of how the IPD considered any Indigenous laws, customs and policies	Indigenous Nation Background and Applicable Agreements	Section 6.2; Table 6-1

IPD Guidelines Page #	IPD Guidelines Section Title	EAO Early Engagement Guide V2.0 Appendix 1 IPD Information Requirement	IPD Section Title	IPD Section or Location
16	First Nations	A list of any issues, concerns, or questions raised by First Nations during engagement on the draft IPD or other information shared in relation to the proposed project** and how this input was considered in the proposed project (**This information should be shared with and agreed upon by the First Nation prior to submission to the EAO. Information that is confidential to a First Nation should not be included in the IPD – please contact the EAO to discuss with the First Nation how confidential information may be shared.)	Early Project Engagement and Development of the IPD and EP	Section 6.3, Table 6-1
16	Biophysical Environment	A description of the natural setting characteristics, including coastal, foreshore, riparian, mountainous, watersheds, and agricultural land	Physical Environment	Section 8.2.1
16	Biophysical Environment	A description of disturbed area characteristics, including brown field, and any history of development	Introduction; Project History; Project Site	Section 1.0; Section 3.3; Section 8.1
16	Biophysical Environment	Identification of sensitive or vulnerable species, ecosystems, and/or habitats in the project area	Indigenous Collaboration in Project Design; Biological Environment; Project Interactions and Effects	Section 2.1.1; Section 8.2.2; Section 9.1

IPD Guidelines Page #	IPD Guidelines Section Title	EAO Early Engagement Guide V2.0 Appendix 1 IPD Information Requirement	IPD Section Title	IPD Section or Location
16	Biophysical Environment	Results of a search of the Contaminated Site Registry to identify existing registered contaminated sites that overlap with the project area; If this search identifies a Contaminated Site Registry Schedule 2 Activity in the project area, a description of the proposed activities in that area including soil removal or disturbance	Project History	Section 3.3
16	Biophysical Environment	A list of existing data, including monitoring reports, previous EAs, regional studies, and/or other sources of information that support the understanding of the existing biophysical conditions	Existing Conditions Studies	Appendix B, Table B-1
17	Human and Community Wellbeing	A description of the proposed project's proximity to local communities, including seasonal or temporary residences	Human Environment	Section 8.2.3
17	Human and Community Wellbeing	Identification of the local governments within which the proposed project is located or where effects may occur	Government Agencies	Section 7.1; Table 7-1
17	Human and Community Wellbeing	A description of the proposed project's proximity to important or sensitive community and natural places such as municipal boundaries, parks, schools, hospitals, housing, water supplies, roads, railways, and protected and recreational areas	Project Location; Project Existing Conditions Studies	Section 3.2; Section 4.2; Table 4-1; Section 4.3; Table 4-2 Section 8.2.1; Section 8.2.2; Section 8.2.3; Section 8.2.4

IPD Guidelines Page #	IPD Guidelines Section Title	EAO Early Engagement Guide V2.0 Appendix 1 IPD Information Requirement	IPD Section Title	IPD Section or Location
17	Human and Community Wellbeing	A list of existing data, including monitoring reports, previous EAs, regional studies, and/or other sources of information that support the understanding of the existing human environment conditions	Existing Conditions Studies	Appendix B
17	Human and Community Wellbeing	Anticipated local employment and training opportunities	Purpose, Rationale, and Benefits of the Project; Operation Phase	Section 3.1, Table 3-1; Section 4.3.2
17	Human and Community Wellbeing	Potential social and economic contributions and benefits to local communities	Purpose, Rationale, and Benefits of the Project	Section 3.1; Table 3-1
17	Human and Community Wellbeing	Anticipated business opportunities for local suppliers, including any applicable eligibility requirements for suppliers	Purpose, Rationale, and Benefits of the Project; Project Interactions and Effects	Section 3.1; Table 3-1; Section 9.1; Table 9-2
17	Human and Community Wellbeing	Identification of any sensitive or vulnerable economic, social, heritage, or health values that may be affected by the project	Government Agencies; Project Existing Conditions Studies	Section 7.1; Section 8.2
17	Human and Community Wellbeing	A preliminary understanding of the anticipated size of the workforce for each project phase, where the workforce will be drawn from, and where the workforce will be housed. Refer to the Human and Community Wellbeing Guidelines for further information	Purpose, Rationale, and Benefits of the Project; Project Phases and Activities	Section 3.1; Section 4.3

IPD Guidelines Page #	IPD Guidelines Section Title	EAO Early Engagement Guide V2.0 Appendix 1 IPD Information Requirement	IPD Section Title	IPD Section or Location
17	Emissions, Discharges, and Waste	A high-level outline of anticipated direct project waste and emissions to land, air, and water, including estimated greenhouse gas (GHG) emissions (using annual carbon dioxide equivalents). This information would include direct emissions that are expected to be above provincial or national standards and emissions that have the potential to interact with Indigenous interests, the biophysical environment, and/or the human environment.	Emissions, Discharges, and Waste	Section 4.5; Table 4-4
17	Emissions, Discharges, and Waste	A description of proposed mitigation measures and/or project design changes to address emissions, including GHGs	Emissions, Discharges, and Waste	Section 4.5; Table 4-4
17	Public and Environmental Safety	A description of potential malfunctions or accidents associated with the industry or specific to the proposed project and how they will be managed	Malfunctions and Accidents	Section 10
17	Public and Environmental Safety	Include any proposed outreach to help First Nations, governments and the public better understand the risks and mitigations	Malfunctions and Accidents	Section 10
17	Public and Environmental Safety	Include any issues raised about public and environmental safety during engagement with First Nations, the public, provincial and federal government agencies, and stakeholders and how issues were considered in developing any mitigation measures or design changes	Early Project Engagement and Development of the IPD and EP; Government Agencies; Public Stakeholders	Section 6.3; Section 7.1; Section 7.2

IPD Guidelines Page #	IPD Guidelines Section Title	EAO Early Engagement Guide V2.0 Appendix 1 IPD Information Requirement	IPD Section Title	IPD Section or Location
18	Alternative means of Carrying out the Project	A high-level description of the alternative options for the proposed project, including a rationale for the preferred option that demonstrates how positive and negative effects and/or issues raised during engagement have been considered	Project Design and Siting Constraints/Options; Alternatives to the Project; Alternative Means for Carrying Out the Project; Indigenous Collaboration in Project Design	Section 4.6; Section 4.7; Section 4.8; Table 4-6; Section 2.1.1
18	Alternative means of Carrying out the Project	For mine projects, a description of how the project meets Technology Readiness Level 7 (see Technology Readiness Assessment Interim Technical Guidance)	Water Requirements and Management; Alternative Means for Carrying Out the Project	Section 4.4; Section 4.8
18	Alternative means of Carrying out the Project	The alternative means of undertaking the proposed project may include information related to: the use of best available technologies; the technical and economic feasibility; the potential effects, risks and uncertainties of those alternatives; the preferred option and a rationale for this preference; and, the different options for the project location, project routing, technologies, mitigation, or design	Project Design and Siting Constraints/Options; Alternative Means for Carrying Out the Project	Section 4.6, Table 4-5; Section 4.8, Table 4-6
18	Effects of the Environment on the Project	An overview of potential effects of natural hazards or processes and climate change on the proposed project	Effects of the Environment on the Project	Section 11.0

IPD Guidelines Page #	IPD Guidelines Section Title	EAO Early Engagement Guide V2.0 Appendix 1 IPD Information Requirement	IPD Section Title	IPD Section or Location
18	Land and Water Use	An outline of the anticipated project footprint and proposed area of disturbance	Project Location	Section 3.2
18	Land and Water Use	A description of the land required for the proposed project, including whether the project is located on private lands, provincial or federal Crown lands, or Indian Reserve lands	Project Location; Land and Resource Management Areas	Section 3.2; Section 3.2.1
18	Land and Water Use	Include the applicable zoning, Agriculture Land Reserve designation, land and resource management plans, and other land use designations (e.g. parks and protected areas) and the legal land descriptions and/or tenure numbers of those lands, if known	Project Location; Project History	Section 3.2; Section 3.3
18	Land and Water Use	A description of past uses of the land required for the proposed project, including whether the site has been previously developed	Project History	Section 3.3
18	Land and Water Use	A description of water requirements for the proposed project, if applicable, and the proposed source of water	Water Requirements and Management	Section 4.4; Table 4-3
19	Land Use Plans	A list of all relevant land use plans, including provincial land use plans, Indigenous land use plans, and relevant municipal plans	Land and Resource Management Areas	Section 3.2.1
19	Land Use Plans	An identification of any rezoning or changes in land designations that would be required for the proposed project	Land and Resource Management Areas	Section 3.2.1

IPD Guidelines Page #	IPD Guidelines Section Title	EAO Early Engagement Guide V2.0 Appendix 1 IPD Information Requirement	IPD Section Title	IPD Section or Location
19	Project Interactions	A description of potential interactions between the proposed project and the biophysical and human environments, including Indigenous interests. It may be helpful to present this information in a table format, refer to the Effects Assessment Policy for examples of interaction tables	Project Interactions and Effects; Potential Cumulative Effects	Section 9.1; Table 9-1; Section 9.2
19	Project Interactions	A summary of any biophysical feasibility studies undertaken that may be pertinent to understanding potential interactions, if applicable	Biophysical Feasibility Studies; Project Interactions and Effects	Section 8.2.2; Section 9.1
19	Project Interactions	A list of any activities proposed to be undertaken during the Early Engagement period to inform the development of the DPD or the Application, should the project proceed to an EA	Planned Indigenous Engagement; Government, Public, and Stakeholder Engagement	Section 6.3.3; Section 7.0
19	Project Interactions	An identification of existing cumulative effects in the region that the project may interact with. Refer to the Effects Assessment Policy for more information.	Potential Cumulative Effects	Section 9.2

Appendix E. IAAC Table of Concordance

E.1. IAAC Table of Concordance

Table E-1: IAAC – IPD Table of Concordance for the Lawyers-Ranch Project

IAAC IPD Part & Sub-Section #	IAAC IPD Section Title	IAAC IPD Information Requirement	IPD Section Title	IPD Section, Volume/ Sub-Section & Relevant Appendix
Part A, 1	General Information	The project's name, type or sector and proposed location.	Introduction	Section 1.0
Part A, 2	General Information	The proponent's name and contact information and the name and contact information of their primary representative for the purpose of the description of the project.	Proponent Information	Section 2.0; Table 2-1
Part A, 3	General Information	A summary of any engagement undertaken with any jurisdiction or other party, including a summary of the key issues raised and the results of the engagement, and a brief description of any plan for future engagement.	Indigenous Nations Interests and Engagement; Early Project Engagement and Development of the IPD and EP; Government, Public and Stakeholder Engagement	Section 6.0; Section 6.3, Table 6-1 Section 7.0
Part A, 4	General Information	A list of the Indigenous groups that may be affected by the carrying out of the project, a summary of any engagement undertaken with the Indigenous peoples of Canada, including a summary of key issues raised and the results of the engagement, and a brief description of any plan for future engagement.	Indigenous Nations Interests and Engagement; Identified Indigenous Nations; Early Project Engagement and Development of the IPD and EP; Planned Indigenous Engagement	Section 6.0; Section 6.1; Section 6.3, Table 6-1; Section 6.3.3

IAAC IPD Part & Sub-Section #	IAAC IPD Section Title	IAAC IPD Information Requirement	IPD Section Title	IPD Section, Volume/ Sub-Section & Relevant Appendix
Part A, 5	General Information	Any study or plan, relevant to the project, that is being or has been conducted in respect of the region where the project is to be carried out, including a regional assessment that is being or has been carried out under section 92 or 93 of the Act or by any jurisdiction, including by or on behalf of an Indigenous governing body, if the study or plan is available to the public.	Legislative and Regulatory Context	Section 5.0
Part A, 6	General Information	Any strategic assessment, relevant to the project, that is being or has been carried out under section 95 of the Act.	Legislative and Regulatory Context	Section 5.0
Part B, 7	Project Information	A statement of the purpose of and need for the project, including any potential benefits.	Purpose, Rationale, and Benefits of the Project	Section 3.1
Part B, 8	Project Information	The provisions in the schedule to the Physical Activities Regulations describing the project, in whole or in part.	Federal Impact Assessment Act and British Columbia Environmental Assessment Act	Section 5.1
Part B, 9	Project Information	A list of all activities, infrastructure, permanent or temporary structures and physical works to be included in and associated with the construction, operation and decommissioning of the project.	Proposed Project Components; Project Phases and Activities; Project Interactions and Effects	Section 4.2; Table 4-1; Section 4.3; Table 4-2; Table 9-1
Part B, 10	Project Information	An estimate of the maximum production capacity of the project and a description of the production processes to be used.	Operation Phase	Section 4.3.2

IAAC IPD Part & Sub-Section #	IAAC IPD Section Title	IAAC IPD Information Requirement	IPD Section Title	IPD Section, Volume/ Sub-Section & Relevant Appendix
Part B, 11	Project Information	The anticipated schedule for the project's construction, operation, decommissioning and abandonment, including any expansions of the project.	Project Timing; Project Phases and Activities	Section 3.4; Section 4.3; Table 4-2
Part B, 12	Project Information	A list of (a) potential alternative means of carrying out the project that the proponent is considering and that are technically and economically feasible, including through the use of best available technologies; and	Alternative Means for Carrying Out the Project	Section 4.8; Table 4-6
		(b) potential alternatives to the project that the proponent is considering and that are technically and economically feasible and directly related to the project.	Alternatives to the Project	Section 4.7
Part C, 13	Location Information	A description of the project's proposed location, including (a) its proposed geographic coordinates, including, for linear development projects, the proposed locations of major ancillary facilities that are integral to the project and a description of the spatial boundaries of the proposed study corridor;	Introduction; Project Location; Project Description	Section 1.0; Figure 1-1; Section 3.2; Section 4.0

IAAC IPD Part & Sub-Section #	IAAC IPD Section Title	IAAC IPD Information Requirement	IPD Section Title	IPD Section, Volume/ Sub-Section & Relevant Appendix
		(b) site maps produced at an appropriate scale in order to determine the project's proposed general location and the spatial relationship of the project components;	Project Overview; Project Location; Proposed Project Components	Section 3.0; Figure 3-1, Figure 3-2, Section 3.2; Section 4.2
		(c) the legal description of land to be used for the project, including, if the land has already been acquired, the title, deed or document and any authorization relating to a water lot;	Project Location	Section 3.2
		(d) the project's proximity to any permanent, seasonal or temporary residences and to the nearest affected communities;	Human Environment	Section 8.2.3
		(e) the project's proximity to land used for traditional purposes by Indigenous peoples of Canada, land in a *reserve* as defined in subsection 2(1) of the *Indian Act*, *First Nation land* as defined in subsection 2(1) of the *First Nations Land Management Act*, land that is subject to a comprehensive land claim agreement or a self-government agreement and any other land set aside for the use and benefit of Indigenous peoples of Canada; and	Project Location; Indigenous Nation Background and Applicable Agreements	Section 3.2; Table 3-2; Table 3-3; Section 6.2
		(f) the project's proximity to any federal lands.	Project Location	Section 3.2

IAAC IPD Part & Sub-Section #	IAAC IPD Section Title	IAAC IPD Information Requirement	IPD Section Title	IPD Section, Volume/ Sub-Section & Relevant Appendix
Part C, 14	Location Information	A brief description of the physical and biological environment of the project's location, based on information that is available to the public.	Existing Environmental Setting; Physical Environment; Biological Environment	Section 8.0; Section 8.2.1; Section 8.2.2
Part C, 15	Location Information and Context	A brief description of the health, social and economic context in the region where the project is located, based on information that is available to the public or derived from any engagement undertaken.	Human Environment	Section 8.2.3
Part D, 16	Federal, Provincial, Territorial, Indigenous and Municipal Involvement	A description of any financial support that federal authorities are, or may be, providing to the project.	Legislative and Regulatory Context	Section 5.0
Part D, 17	Federal, Provincial, Territorial, Indigenous and Municipal Involvement	A list of any federal lands that may be used for the purpose of carrying out the project.	Project Location	Section 3.2

IAAC IPD Part & Sub-Section #	IAAC IPD Section Title	IAAC IPD Information Requirement	IPD Section Title	IPD Section, Volume/ Sub-Section & Relevant Appendix
Part D, 18	Federal, Provincial, Territorial, Indigenous and Municipal Involvement	A list of any jurisdictions that have powers, duties or functions in relation to an assessment of the project's environmental effects.	Legislative and Regulatory Context Federal Impact Assessment Act and British Columbia Environmental Assessment Act Existing Permits, Licenses and Approvals; Other Anticipated Provincial and Federal Permits, Licenses and Approvals	Section 5.1; Section 3.5; Table 3-4; Section 5.3; Table 5-1
Part E, 19	Potential Effects of the Project	A list of any non-negligible adverse changes — to the following components of the environment that are within the legislative authority of Parliament — that may be caused by the carrying out of the project: (a) *fish* and *fish habitat*, as defined in subsection 2(1) of the *Fisheries Act*; (b) *aquatic species*, as defined in subsection 2(1) of the *Species at Risk Act*; and (c) *migratory birds*, as defined in subsection 2(1) of the *Migratory Birds Convention Act, 1994*.	Biophysical Feasibility Studies; Project Interactions and Potential Effects	Section 8.2.2, Table 8.1; Section 9.1; Table 9-1; Table 9-2

IAAC IPD Part & Sub-Section #	IAAC IPD Section Title	IAAC IPD Information Requirement	IPD Section Title	IPD Section, Volume/ Sub-Section & Relevant Appendix
Part E, 20	Potential Effects of the Project	A list of any non-negligible adverse changes to the environment — that would occur on federal lands — that may be caused by the carrying out of the project. 20.1: A list of any non-negligible adverse changes to the marine environment — that are caused by pollution and that would occur outside Canada — that may be caused by the carrying out of the project. 20.2: A list of any non-negligible adverse changes to interprovincial waters or to *boundary waters* or *international waters*, as those terms are defined in subsection 2(1) of the *Canada Water Act*, — that are caused by pollution — that may be caused by the carrying out of the project.	Potential Project Effects	Section 9.0

IAAC IPD Part & Sub-Section #	IAAC IPD Section Title	IAAC IPD Information Requirement	IPD Section Title	IPD Section, Volume/ Sub-Section & Relevant Appendix
Part E, 21	Potential Effects of the Project	With respect to the Indigenous peoples of Canada, a brief description of any non-negligible adverse impacts on physical and cultural heritage, the current use of lands and resources for traditional purposes or any structure, site or thing that is of historical, archaeological, paleontological or architectural significance — occurring in Canada and resulting from any change to the environment — that may be caused by the carrying out of the project, based on information that is available to the public or derived from any engagement undertaken with the Indigenous peoples of Canada.	Project Interactions and Effects	Section 9.1; Table 9-2
Part E, 22	Potential Effects of the Project	A brief description of any non-negligible adverse changes occurring in Canada to the health, social or economic conditions of the Indigenous peoples of Canada, that may be caused by the carrying out of the project, based on information that is available to the public or derived from any engagement undertaken with the Indigenous peoples of Canada. 22.1: If the project is to be carried out on federal lands or is a *federal work or undertaking*, as defined in subsection 3(1) of the *Canadian Environmental Protection Act, 1999*, a list of any non-negligible adverse effects that may be caused by the carrying out of the project.	Project Interactions and Effects	Section 9.1, Table 9-1, Table 9-2

IAAC IPD Part & Sub-Section #	IAAC IPD Section Title	IAAC IPD Information Requirement	IPD Section Title	IPD Section, Volume/ Sub-Section & Relevant Appendix
Part E, 23	Potential Effects of the Project	An estimate of any greenhouse gas emissions associated with the project.	Greenhouse Gas Emissions	Section 4.5.2; Table 4-4
Part E, 24	Potential Effects of the Project	A list of the types of waste and emissions that are likely to be generated — in the air, in or on water and in or on land — during any phase of the project.	Emissions, Discharges, and Waste	Section 4.5
Part F, 25	Summary	A plain-language summary of the information that is required under items 1 to 24 in English and in French.	Plain Language Summary, developed under separate cover	N/A

Appendix F. Engagement Plan

Engagement Plan

Lawyers-Ranch Project

December 17, 2025

THESIS GOLD
1075 West Georgia, Suite 1050, Vancouver, BC V6E 3C9

Revision Record

Revision	Date	Revision Description
0	November 3. 2025	Issued for regulatory review
1	December 9, 2025	Re-issued regulatory submission to address EAO and IAAC comments.
2	December 17, 2025	Re-issued for updates

List of Contributors

Affiliation	Contributor	Credentials	Section(s)
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Notes: * The EA Technical Team relied on the data, information and engagement summaries provided by Thesis without full verification.			

Statement of Limitations

This document has been prepared by One-Eighty Consulting Group Inc. (One-Eighty) and reviewed and finalized by Chu Cho Environmental LLP (CCE) and SLR Consulting (Canada) Ltd. (SLR) as the Environmental Assessment (EA) Technical Team, in accordance with the scope of work and all other terms and conditions of the agreement between such parties. The EA Technical Team acknowledges and agrees that its client, Thesis Gold Inc. (Thesis), may provide this report to government agencies, interest holders, and/or Indigenous Nations as part of project planning or regulatory approval processes. Copying or distribution of this report, in whole or in part, for any other purpose other than as aforementioned is not permitted without the prior written consent of the EA Technical Team and Thesis.

Any findings, conclusions, recommendations, or designs provided in this document are based on conditions and criteria that existed at the time work was completed and the assumptions and qualifications set forth in this document.

This report may contain data, technical information, and engineering reports provided by third party sources (including Thesis and any of its consultants and other technical service providers), upon which the EA Technical Team is entitled to rely without verification. The EA Technical Team does not warrant the accuracy of any such data or information. The contents of this document remain the sole responsibility of Thesis.

Nothing in this document constitutes a legal opinion, nor does the EA Technical Team make any representation as to compliance with any laws, rules, regulations, or policies established by federal, provincial, territorial, or local government bodies, other than as specifically set forth in this document. Revisions to the legislative or regulatory standards referred to in this document may be expected over time and, as a result, modifications to the findings, conclusions, or recommendations may be necessary.

List of Acronyms & Abbreviations

Acronym	Definition
AIR	Application Information Requirements
BAT	Best Available Technology
BC	British Columbia
DIA	Department of Indian Affairs
DPD	Detailed Project Description
EA	Environmental Assessment
EAC	Environmental Assessment Certificate
EAO	Environmental Assessment Office
EP	Engagement Plan
EPIC	Environmental Assessment Office Project Information Centre
IAAC	Impact Assessment Agency of Canada
IPD	Initial Project Description
OP	open pit
Project	gold-silver mining project in the Toodoggone mining region of British Columbia, named the Lawyers-Ranch Project
Province	Province of British Columbia
Reserve	Indian Reserve
SLR	SLR Consulting (Canada) Limited
TAC	Technical Advisory Committee
TCG	Tahltan Central Government
Thesis	Thesis Gold Inc.
THREAT	Tahltan Heritage, Resources and Environmental Assessment Team
TSF	Tailings Storage Facility

Symbols & Units of Measurement

Symbol/Unit of Measurement	Definition
ha	hectare
km	kilometre

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Appendices

1.0 Introduction

Thesis Gold Inc. (Thesis) is proposing to construct and operate a gold-silver mining project in the Toodoggone mining region of British Columbia, named the Lawyers-Ranch Project (The Project), which is located approximately 450 kilometres (km) north-northwest of the City of Prince George and 275 km north of the Town of Smithers and is situated on Crown land in British Columbia (BC), administered by the Province of British Columbia (Province) (Figure 1-1). The Project partially overlaps with the traditional territories of Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation.

The Project area was previously disturbed by the Cheni Mine, a past-producing mine operated by Cheni Gold Mines Inc. Thesis intends to leverage existing infrastructure from the former Cheni Mine to minimize the amount of new disturbance created by the Project. Existing infrastructure from the former Cheni Mine includes roads and trails, underground mining areas, and the nearby Sturdee Airstrip. Several other exploration companies in the area are currently using this airstrip (JDS 2024).

The Project has mineral deposits that are best accessed through both underground and open pit (OP) mining methods. The Project's anticipated production rate is approximately 5.1 million tonnes per year on average, with a mine life of approximately 14 to 20 years (depending on the development and refinement of the Mine Plan). The Project is anticipated to require approval under both the BC *Environmental Assessment Act* and the federal *Impact Assessment Act*. Additional details on the Project can be found in the Initial Project Description (IPD).

The submission of the IPD along with this Engagement Plan (EP) to the BC Environmental Assessment Office (EAO) represents the Project's formal entry into the Early Engagement phase of the BC EAO process. Submission of the IPD and a Plain Language Summary to the Impact Assessment Agency of Canada (IAAC) represents formal entry into the Planning Phase of the IAAC process. The EAO has an agreement with IAAC that can enable a "substituted" regulatory process for projects that require approval from the Minister of Environment and Climate Change. In such cases, both agencies rely on the assessment administered by one government (although both retain separate decision-making authority at the end of the assessment). It is expected that EAO and IAAC will coordinate the initial phases of their respective processes and the EAO will request that the Project proceed through a substituted process led by EAO.

Thesis initiated engagement with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation as early as 2018, and several agreements with these Indigenous Nations have been executed. The Nations have participated in varying degrees in the development and implementation of environmental field programs and co-design initiatives relating to Project components that have design flexibility. Several agreements with these Indigenous Nations have been executed, including agreements to guide collaboration on exploration activities and the Environmental Assessment (EA) process.

Thesis has also entered into equity agreements with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation, who have chosen to invest in the Project to share in its future success. Similar agreements are being explored with Tahltan Nation. This foundational work is intended to position the Project to move forward with shared oversight and mutual benefit.

The purpose of this EP is to provide an initial high-level summary of Thesis' engagement to date on the Project and outlines the engagement activities to be carried out during the Early Engagement phase. Prior to submission, drafts of this EP and the IPD were shared with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation for review and feedback. The feedback received from Indigenous Nations on the EP, and gathered during meetings with some of the Nations, has been incorporated into this version of the EP or has been tracked for consideration in the development of future EA documents.

1.1 Proponent Information and Contacts

Thesis is a Canadian mineral resource development and exploration company based in Vancouver, BC, and is the owner and operator of the Project. Contact information for Thesis is provided below in Table 1-1.

Table 1-1: Primary Contact Information for Thesis Gold Inc.

Contact Information	
Head Office	Thesis Gold Inc. 1075 West Georgia Street, Suite 1050 Vancouver, BC, Canada V6E 3C9
E-mail	community@thesisgold.com
Website	https://thesisgold.com/
Phone Number	(416) 662-9978
Thesis Representative	Stephen Crozier Thesis Gold Inc. Executive VP, External Affairs & Sustainability
Principal Contact for the Environmental Assessment	Carmen Holschuh One-Eighty Consulting Group community@thesisgold.com

1.2 Project Location

The Project is located in north-central BC, approximately 480 km northwest of the City of Prince George and 275 km north of the Town of Smithers (Figure 1-1).

The Project is accessible primarily via the Finlay Forest Service Road, which originates south of the District of Mackenzie and connects to the Omineca Resource Access Road or "Kemess Road." The coordinates for the Project centre point (between the Lawyers Site and Ranch Site mineral deposits) are approximately Universal Transverse Mercator Zone 9 603229, 6355804. The communities and areas of interest nearest to the Project are summarized in Table 1-2 below and are illustrated in Figure 1-1 and Figure 1-2.

Table 1-2: Local Communities and Areas of Interest

Category	Local Communities	Approximate Distance from Project (km)		Direction from Project
		By Road[1]	Straight Line	
Kwadacha Nation	Kwadacha (Fort Ware)	534	99	East
Tsay Keh Dene Nation	Tsay Keh Dene	648	150	Southeast
Takla Nation	Takla Landing	461	228	South
Tahltan Nation	Dease Lake	1,561	201	Northwest
	Iskut	1,449	168	West
	Telegraph Creek	1,367	238	West
Local Municipalities	Mackenzie	464	347	Southeast
	Prince George	625	481	Southeast
	Smithers	850	292	South

Note: Approximate distances were measured in a straight line to the edge of the Project footprint outline.

[1] GeoBC (2017).

Legend

- Lawyers-Ranch Project
- Sturdee Airstrip
- Kemess Mine
- Town and Community
- Emergency Services
- Existing Transmission Line
- Highway
- Forest Service Road
- Potential Transmission Line Extension Corridor
- NTS Mapsheet Grid

North American Datum 1983
NAD 1983 BC Environment Albers

Map Center Coordinates: -124.9119° 55.94954°
Project Coordinates: -127.282014° 57.402529°
Project NTS Map: 94E
Scale: 1:2,500,000

Notes:
1. Basemap Data: GeoBC Data Distribution
2. Basemap: ESRI Topographic
3. Data supplied by Thesis Gold on 2025-01-16
4. Prepared by Chu Cho Environmental

0 50 100
Kilometres

Figure 1-1
Rev. 2

December 17, 2025

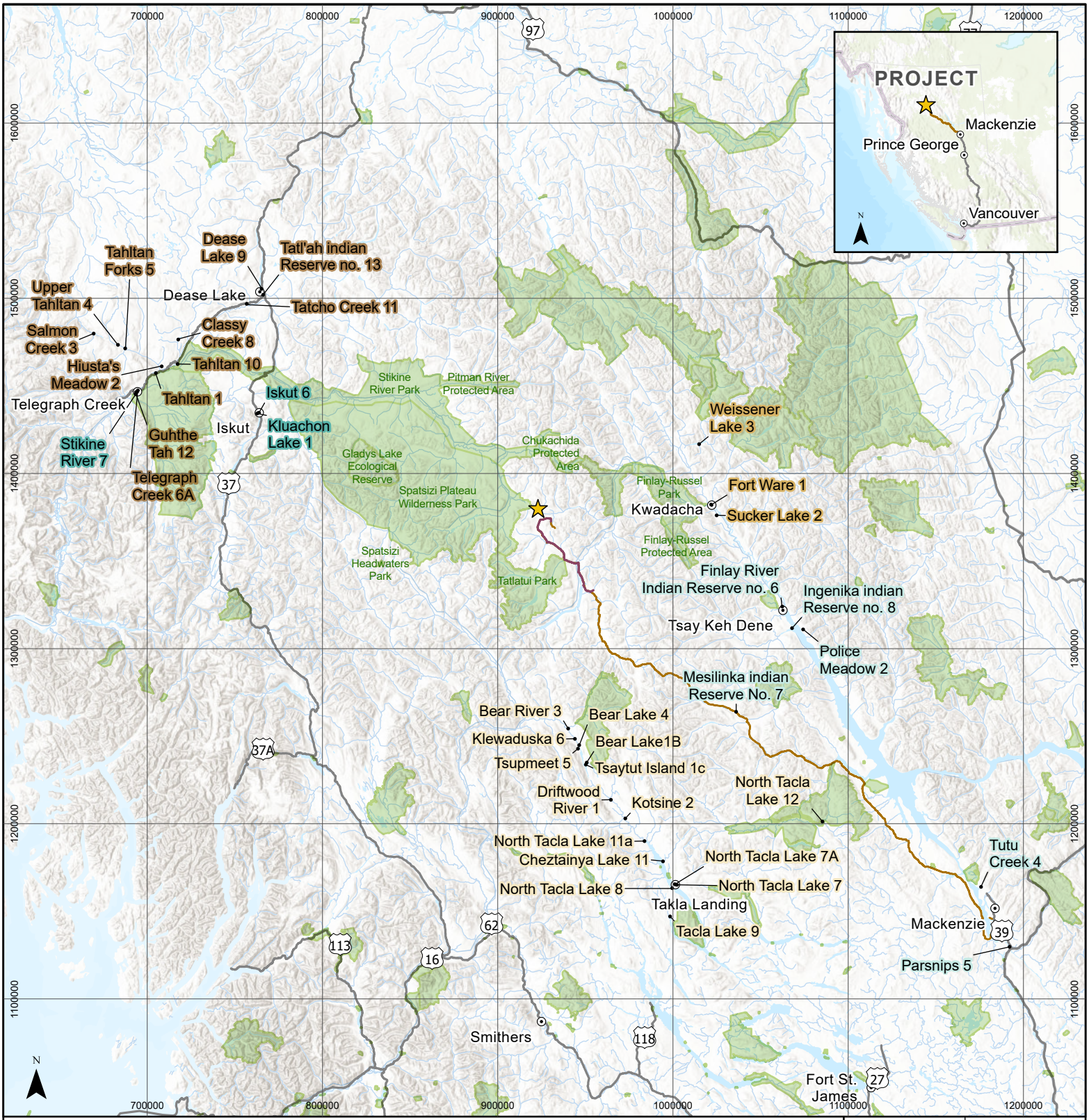
THESIS GOLD

Project Location

Lawyers-Ranch Project Engagement Plan

CHU CHO ENVIRONMENTAL one-eighty SLR

Document Path: G:_Projects\201201_069433_CCE_ThesisEA\1_Workspace\1_Maps\CCE_Dec2025\IPD_EP\p30\IPD and EP Maps Shared.aprx



Legend

- Lawyers-Ranch Project
- Town and Community
- Highway
- Forest Service Road
- Potential Transmission Line Extension Corridor
- BC Parks

Indian Reserve by Indigenous Group

- Kwadacha Nation
- Tsay Keh Dene Nation
- Takla Nation
- Iskut Nation
- Tahltan Nation

North American Datum 1983
NAD 1983 BC Environment Albers

Map Center Coordinates: -127.21314° 57.13626°
Project Coordinates: -127.282014° 57.402529°
Project NTS Map: 94E
Scale: 1:3,000,000

Notes:
1. Basemap Data: GeoBC Data Distribution
2. Basemap: ESRI Topographic
3. Data supplied by Thesis Gold on 2025-01-16
4. Prepared by Chu Cho Environmental

0 60 120
Kilometres

Figure 1-2
Rev. 2

December 17, 2025

THESIS GOLD

Local Communities and Areas of Interest

Lawyers-Ranch Project Engagement Plan

CHU CHO ENVIRONMENTAL one-eighty SLR

The Project is proposed on provincial Crown lands. The Project will not be carried out on federal lands. Thesis has not requested, nor has it received, federal funding for the Project as of the completion of this document.

The nearest park is the Spatsizi Plateau Wilderness Provincial Park. The shortest distance between the Project footprint (southern-most pit at the Ranch Site) and the Spatsizi Plateau Wilderness Provincial Park (eastern edge) is approximately 1.5 km.

The nearest federal lands to the Project are Indian Reserves, as defined by the federal *Indian Act* (Reserve), Fort Ware 1 and Weissener Lake 3, belonging to Kwadacha Nation. They are both approximately 100 km away from the Project. Distances from the Project to relevant Indian Reserves are summarized in Table 1-3 and represented spatially in Figure 1-1.

Table 1-3: Approximate Distance to Indian Reserves

Indigenous Group	Indian Reserve Name	Approximate Distance from Project (km)	
		By Road[1]	Straight Line
Kwadacha Nation	Fort Ware 1	534	99
	Sucker Lake 2	526	102
	Weissener Lake 3	588*	99
Tsay Keh Dene Nation	Finlay River 6	461	150
	Ingenika 8	461	160
	Mesilinka 7	207	162
	Parsnip 5	468*	368
	Police Meadow 2	494	167
	Tutu Creek 4	481	333
Takla Nation	Bear Lake (Fort Connolly) 4	752*	137
	Bear Lake (Tsaytut Bay) 1B	739*	148
	Bear Lake (Upper Driftwood River) 3	763*	127
	Cheztainya Lake 11	663	213
	Driftwood River (Kastberg Creek) 1	711*	171
	Klewaduska (Cataract) 6	754*	133
	Kotsine (Skutsil) 2	697*	184
	North Tacla Lake (North End Meadow) No. 11A	692	199

Indigenous Group	Indian Reserve Name	Approximate Distance from Project (km)	
		By Road[1]	Straight Line
	North Tacla Lake (West Landing) 8	671*	230
	North Tacla Lake 12	329*	242
	North Tacla Lake 7	647	229
	North Tacla Lake 7A	648	228
	Tacla Lake (Ferry Landing) 9	667	245
	Tsaytut Island 1C	741*	149
	Tsupmeet (Patcha Creek) 5	751*	139
Iskut Nation	Iskut 6	1,367	169
	Kluachon Lake 1	1,368	169
	Stikine River 7	1,563	239
Tahltan Nation	Classy Creek 8	1,514*	227
	Dease Lake 9	1,454	202
	Guhthe Tah 12	1,562	239
	Hiusta's Meadow 2	1,543	230
	Salmon Creek 3	1,602*	273
	Tahltan 1	1,542	231
	Tahltan 10	1,522	222
	Tahltan Forks 5	1,586*	253
	Tatcho Creek 11	1,462	203
	Tatl'ah IR No. 13	1,452	199
	Telegraph Creek 6A	1,561	238
	Upper Tahltan 4	1,590*	258

Notes:

1. Distances marked by an asterisk (*) indicate that the reserve is not fully accessible by road. These distances are approximate and may include a combination of road, rail, and straight-line measurements.
2. Takla Nation, as part of its review of the IPD and EP, shared that it is in ongoing settlement discussions with Canada that may result in the attribution of additional reserves to Takla Nation.

[1] GeoBC (2017).

2.0 Engagement Principles and Methods

Thesis' approach to engagement is grounded in practical collaboration, with a focus on fostering transparent communication and open, two-way dialogue. Engagement efforts are tailored to reflect the unique interests and circumstances of each group, directing time and energy where it matters most.

This section outlines the principles behind this approach and the methods for putting them into practice and concludes with a table outlining the anticipated EA phases and related opportunities for engagement.

2.1 The Thesis Approach

Thesis' approach to exploration and Project development is rooted in practical environmental stewardship and collaborative decision-making. Thesis believes positive, long-term working relationships with potentially affected Indigenous Nations will lead to the best possible version of the Project.

Thesis seeks to do more than meet the minimum regulatory requirements. To enable this, a set of working priorities guides Project development, including:

- Enable early and ongoing participation from Indigenous Nations in environmental field programs and monitoring, employment and contracting, Project planning and design, and equity ownership.
- Integrate Indigenous Knowledge and science systems to inform planning, design, and decision-making throughout Project development.
- Where feasible, minimize new impacts to land by using existing disturbance and infrastructure, and carry out progressive reclamation to restore land as the Project advances.

Further details on Thesis' ongoing efforts to advance these priorities are provided in the sections below.

2.2 Engagement Principles

This EP reflects Thesis' approach to working with Indigenous Nations, regulators, and other stakeholders to build trust through clear communication, thoughtful responsiveness, and transparency. The planned approach for working with Indigenous Nations has been informed by the years of work already undertaken with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation, whose traditional territories partially overlap with the Project. This engagement philosophy is grounded in practical collaboration, early involvement, and shared environmental responsibility.

Thesis also recognizes that additional Indigenous Nations and other stakeholders that have not been identified at the time of writing may be engaged through the EA process. While levels of involvement may differ, the following engagement principles will remain consistent.

2.2.1 Early Engagement and Foundation Building

Thesis believes that early dialogue and relationship-building create the conditions for meaningful engagement. Accordingly, Thesis engages early with Indigenous Nations, regulators, and stakeholders to foster responsible, collaborative development.

2.2.1.1 Indigenous Nation Involvement, Collaboration, and Accommodation

Thesis believes that a strong Project must be developed in close collaboration with Indigenous Nations. Thesis will continue engaging with Indigenous Nations in ways that reflect their rights, interests, knowledge, and priorities, and will demonstrate how their input has shaped planning and design.

2.2.1.2 Timely Communication and Transparency

Thesis believes that timely, honest communication builds trust and supports informed participation. Thesis will continue to provide timely and relevant updates about Project planning and design, track input received, and provide feedback on how that input has been addressed.

2.2.1.3 Innovation, Creativity, and Flexibility

Thesis recognizes that different groups have different interests, priorities, and ways of engaging. Thesis adapts its engagement methods to reflect these differences and is open to creative ideas, new approaches, and adaptable engagement formats that seek to improve outcomes.

2.2.1.4 Consistency and Follow-Through

Thesis believes that trust is built over time through consistent, dependable action. Thesis maintains regular engagement, follows up, and provides transparency in next steps, to build lasting, collaborative working relationships.

2.3 Engagement Methods

This section outlines the engagement methods that Thesis will implement to further the Engagement Principles. The proposed methods seek to promote participation, create accessible avenues for feedback, and demonstrate how input can influence Project planning and design. Engagement methods will remain flexible and practical, and this EP will be updated to reflect new input, activities, and direction, as needed.

Communication methods and feedback tools will be adapted to support inclusive dialogue, with materials developed in clear and accessible formats, including visual, written, and oral methods to reflect diverse preferences and communication styles. Additional methods for engagement may be identified as the EA advances.

Thesis will continue to work with Indigenous Nations, land users, underrepresented or marginalized groups, and others with relevant perspectives to tailor engagement to reflect each group's preferences and connection to the Project. Thesis will work with First Nations and communities to identify potentially impacted populations that may be underrepresented by the proposed engagement methods. To mitigate or address underrepresentation, engagement methods will include the following:

- Virtual engagement sessions throughout the EA process will be available at different times of day.

- Seeking input from Indigenous Nation leadership on the best ways to engage with communities, given the isolated nature of the project.
- When Thesis meets with community members, they will request feedback on best way to do so.

A suggestion was made to translate select information into local languages to make them more accessible to Elders and other community members. For example, using Indigenous placenames on maps to reflect how community members refer to locations and geographical features. Thesis will continue to work with First Nations to determine the preferred approaches for developing, presenting, and sharing materials so they are accessible to community members.

Thesis will continue to provide multiple avenues for groups to offer input; from meetings and targeted workshops to document review and written submissions. All input is logged in an engagement record that captures key themes, issues raised and required follow-up. These records inform issue-tracking tables, which describe how concerns have been addressed and indicate where input has influenced Project planning or design.

Input and feedback gathered during Early Engagement will be tracked using structured engagement logs and issue-response tables. These tools will document questions, concerns, and suggestions, and will inform the development of the DPD and, where appropriate, Project planning and design. Specifically, comments and discussions will be noted during meetings, as needed, and meeting notes will be shared with participants before finalization. When a commitment or future action has been decided, Thesis will keep a log of these and will report on them throughout the life of the mine.

Methods of engagement and consultation include:

- Introductory or follow-up meetings with leadership and representatives of Indigenous Nations.
- Technical sessions and focused meetings or working groups on key topics of interest.
- Community workshops, open houses, and site visits.
- Tailored engagement with Elders, knowledge holders, youth, or other identified groups.
- Access to EA documents and dedicated review sessions.
- Public-facing website(s), Facebook page(s), and other social media to share updates, factsheets, and visual materials.
- Structured tools for engagement tracking, information sharing, and follow-up in multiple formats (e.g., maps, posters, videos, plain-language summaries).
- Virtual or physical 3D models to support spatial understanding of the Project.
- Access to materials and information through a community accessible location (e.g., library, band office).

2.4 Regulator-Led Engagement

In addition to engagement activities led by Thesis, the EAO and the IAAC will carry out their own engagement and consultation activities as part of the EA process. Thesis will coordinate with regulators to support these efforts, minimize redundancy, and help ensure that Indigenous Nations and stakeholders receive timely, consistent, and accessible information. The EAO User Guide (EAO 2020a) outlines the phases for the EA process in BC and expectations regarding proponent and regulator-led engagement. Table 2-1 below outlines the regulator-led engagement activities anticipated for each phase of the EA process. Given that Thesis intends for the Project to undergo a substituted assessment, the focus of current planning efforts is on the BC process milestones.

Table 2-1: Phases and Engagement Opportunities in the BC EA Process

Process Phase	Phase Requirement	EAO Led Opportunities for Engagement	Anticipated Timeline
Early Engagement	Early identification of potential key interests and concerns related to the Project and how Thesis will address them. Gather feedback on the IPD and EP to inform the Detailed Project Description (DPD).	• Sharing of IPD and EP for comment. • Public comment period. • Open houses.	Q4 2025 – Q2 2026
Environmental Assessment Readiness	EAO determines whether the Project can commence with the EA.	• EAO summarizes Early Engagement outcomes and identifies key issues.	Q2 2026 – Q3 2026
Process Planning	Establish the scope, procedures, and methods for undertaking the EA. Identify how Indigenous-led processes and decision-making will align with the provincial process. Includes public engagement on Process Order and draft Application Information Requirements (AIR).	• Sharing of draft AIR for input. • Formation of a Technical Advisory Committee (TAC) by EAO. • TAC workshops to present on Project assessment scope and discuss finalization of the AIR.	Q3 2026 – Q4 2026
Application Development and Review	Thesis conducts technical studies to develop Application for the Environmental Assessment Certificate (EAC), seeking feedback from government, Indigenous Nations, and the TAC. Submission of the Initial Application. Revise Initial Application based on feedback, submit Application.	• TAC workshops on Initial Application. • 30-day comment period on Initial Application.	Q4 2026 – Q2 2028
Effects Assessment and Recommendations	EAO prepares Assessment Report describing the Project's potential effects and assessing whether the Project is likely to cause significant effects. Draft conditions are developed by seeking consensus with Indigenous Nations and informed by TAC. EAO issues a recommendation to the Minister as to whether to issue an EAC.	• Public comment period on Assessment Report. • TAC comments on Assessment Report and draft conditions.	Q4 2028 – Q2 2029

Process Phase	Phase Requirement	EAO Led Opportunities for Engagement	Anticipated Timeline
Decision	Ministers determines whether the Project should receive an EAC and EAC conditions are finalized.	• Decision from Ministers is posted to the EAO Project Information Centre (EPIC).	Q2 2029
Compliance and Enforcement	Project is monitored by EAO and applicable ministries for compliance with EAC conditions.	• Complete compliance and monitoring reporting on EPIC website.	Q2 2029, onwards
Source: EAO (2020a).			

3.0 Indigenous Engagement

This section describes Thesis' approach to engagement with Indigenous Nations, including engagement to date and planned engagement. Thesis' approach to Indigenous engagement is guided by the Engagement Principles set out in Section 2.2.

3.1 Indigenous Engagement Approach

The following activities illustrate how Thesis applies the Engagement Principles through its engagement with Indigenous Nations. While specific methods may vary to reflect the preferences and priorities of each Indigenous Nation, Thesis' overall approach will remain consistent by:

- Conducting outreach based on each Indigenous Nation's unique history, governance structure, internal processes for community involvement, and applicable agreements.
- Offering targeted support to assist Indigenous Nations in identifying potential effects to Aboriginal title, rights, and interests, and in co-developing mitigation measures, where appropriate.
- Using plain language and visual materials to support broad and informed participation and facilitate feedback.
- Tracking and following up on input received, including providing rationale where issues or concerns have not been resolved.
- Creating opportunities for collaborative planning and relationship-building, including committee meetings and working groups, where relevant and appropriate.

Thesis recognizes the importance of Indigenous Knowledge for informing responsible Project development. Thesis will seek to follow Indigenous Knowledge protocols and, in line with EAO's *Guide to Indigenous Knowledge in Environmental Assessments* (EAO 2020b), work with knowledge holders to integrate Indigenous Knowledge appropriately and respectfully. Specifically, Thesis' approach to incorporating Indigenous Knowledge into the EA process will be guided by the following principles:

- Acknowledgment of context;
- Iterative, interconnected;
- Broad application;
- Permission of use;
- Relationship based;
- Respect; and
- Transparency.

3.2 Identified Indigenous Nations

Thesis has drawn from a range of sources to identify which Indigenous Nations to initiate early engagement with. These sources include:

- **BC's Consultation Areas Spatial Tool**: Used to generate a list of Indigenous Nations with treaty rights or asserted or proven Aboriginal rights or title and interests in areas (Consultation Areas) that may overlap with the Project and areas of potential direct and indirect effects.
- **A commissioned ethnohistorical report**: Conducted by an ethnohistorian to assess which Indigenous Nations identified by the Consultation Areas Spatial Tool have a documented historical presence in the vicinity of the Project (Clark 2025).
- **Government referrals**: Issued through early exploration permitting processes, identifying Indigenous Nations that the Crown considers as potentially holding relevant rights or interests.
- **Direct outreach and dialogue**: Ongoing conversations with Indigenous Nations that have expressed interest or concern about the Project.

Thesis' use of BC's Consultation Areas Spatial Tool identified nine Indigenous Nations with Consultation Areas overlapping the Project and areas of potential direct and indirect effects: Binche Whut'en, Daylu Dena, Dease River First Nation, Kwadacha Nation, Liard First Nation, Tahltan Nation, Takla Nation, Tsay Keh Dene Nation, and West Moberly First Nations.

Thesis began engagement as early as 2018 with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation, whose traditional territories partially overlap the Project area. Through engagement, these Indigenous Nations have contributed to exploration program planning and have helped shape early Project planning and design. The basis for Thesis' focused engagement with each of these Indigenous Nations is outlined in this EP.

Thesis understands that the list of Indigenous Nations identified for engagement may change. Thesis will engage with Indigenous Nations with Aboriginal rights or interests that may be adversely impacted by the Project. Thesis will provide relevant Project information and, where appropriate, collaboratively determine the frequency and methods of engagement with such Indigenous Nations. Engagement activities will be tailored to each Indigenous Nation's interests and priorities and may include information-sharing meetings, opportunities to review and provide input on EA materials, and other methods for receiving and responding to feedback.

3.3 Indigenous Collaboration in Project Design

The aim of collaboration between Thesis and the engaged Indigenous Nations has been to inform the Project's planning from the start, encompassing exploration activities, mine design, existing conditions data collection, development of mitigation and monitoring programs, and preparation of the IPD and this EP.

Thesis has engaged with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation since 2018 to collaboratively develop and implement existing environmental conditions studies, monitor wildlife and water resources, and identify areas the Nations recognize as warranting protection or special consideration.

The perspectives of these Indigenous Nations will continue to be implemented into planning and designing the Project with shared insight and responsibility.

Key examples of Indigenous Nation collaboration to date include:

- **Equity Ownership**: Thesis has also worked with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation to offer opportunities for direct financial equity in the Project. Initial equity agreements are already in place with these Indigenous Nations. Thesis has made, and will continue to make, efforts to explore similar opportunities with Tahltan Nation. This evolving ownership structure reflects a broader vision and shared oversight that extends into shared opportunity.
- **Collaborative Project Design**: Thesis has worked with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation to begin integrating their perspectives into Project planning and design. These Nations participated in a 2021 tailings and waste rock storage alternatives assessment and a 2025 workshop to gather initial feedback on Project components with design flexibility. These early activities have influenced the design and provided a foundation for continued collaboration as the Project advances through future design and assessment stages.
- **Capacity Building**: Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation's involvement have been prioritized through annual capacity funding, training, and onsite contracting and employment opportunities, resulting in over $50 million (Canadian dollars) in contracts to Indigenous-owned or affiliated businesses to date.
- **Reclamation and Restoration**: The Project is located on the site of the former Cheni Mine. Approximately 90 percent of land disturbed by the company's exploration activities has been reclaimed since Thesis began exploration work at the Project site. This work has been guided by a Reclamation Plan developed in collaboration with Indigenous Nations and is overseen by a team of full-time reclamation supervisors throughout the field season.
- **Wildlife Protection**: A Caribou Mitigation Strategy and broader Wildlife Monitoring and Management Plan were developed for exploration activities in collaboration with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation to track and respond to the presence of caribou and other wildlife in the Project area. An extensive wildlife camera network supports this work and will inform the assessment of potential Project effects.
- **Environmental Management**: Indigenous Nation-owned and affiliated businesses have designed and carried out studies to characterize existing environmental conditions for the Project and monitor effects of ongoing work.

- **IPD and EP Input**: Thesis engaged early with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation to inform them of the development of the IPD and this EP. Draft materials were provided to these Nations for review and comment prior to official regulatory submission. Thesis considered the feedback that was received and engaged with the Nations to discuss how their input was incorporated into the IPD and EP.

Several adjustments to the Project's layout and design have resulted from this collaborative foundation and discussions with Indigenous Nations:

- **Project Footprint**: Thesis merged with Benchmark Metals Inc. in 2023 (see Section 3.3 of the IPD for more details), resulting in the consolidation of the Lawyers and Ranch projects into a single Project. Developing a single Project reduces the Project's overall disturbance footprint and contribution to cumulative effects in the region by using shared infrastructure such as the ore processing plant and Tailings Management Facility (see Table 4-1 of the IPD). The consolidation aligns with concerns expressed by Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation regarding cumulative impacts and proximity to harvesting and other culturally important areas.
- **Placement of Infrastructure**: Following feedback from Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation on alternative options for infrastructure placement, Thesis proposed to relocate the Tailings Storage Facility (TSF) to avoid a culturally sensitive area. Similarly, a transmission line routing option was also removed based on feedback from Nations. Discussions regarding infrastructure placement remain ongoing.
- **Reclamation Objectives**: Thesis is advancing a native plant propagation program with participation from members of Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation. This work is in support of using locally sources plant species in progressive reclamation efforts and eventual mine closure. with locally sourced plant species. The program has been enhanced by Indigenous Knowledge and input since its start in 2023, including direct participation of Indigenous Nations in early program development and seed and stem collection.
- **Archaeological Investigations**: Archaeological investigations have been and will continue to be carried out with opportunities for collaboration with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation to identify areas of heritage and cultural value.

3.4 Indigenous Nation-Specific Engagement

This section provides an overview of the engagement between Thesis and Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation. For each Indigenous Nation, the summary includes:

- A description of the Nation and the basis for Thesis' engagement with the Nation to date.
- Summaries of relevant agreements between government(s) and Thesis.
- A summary of engagement to date.

3.4.1 Collective Engagement

Thesis has, at times, engaged with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation as a collective group since 2020. The approach allowed for coordinated engagement and information sharing. Through collective engagement, information was shared regarding Thesis' mineral exploration activities to support collaboration on environmental management, employment, and contracting opportunities.

Collective engagement events included:

- Eight workshops to discuss Project design, existing conditions studies planning and design, environmental management plan feedback, and environmental stewardship values.
- Nine meetings between senior representatives of Thesis and the Indigenous Nations to oversee cooperation and communication on environmental and economic matters.
- Thirty meetings of an Environmental Management Committee to review environmental studies, environmental management plans, and permit applications.
- Ninety-five meetings of a Business Opportunities Committee to identify and coordinate economic development and contracting opportunities.

These collaborative efforts yielded the following planning, oversight, and economic development outcomes:

- Co-development of cultural and environmental monitoring strategies through management plans for the exploration program, such as:
  - Caribou Mitigation Strategy;
  - Wetland Management Plan;
  - Erosion and Sediment Control Plan;
  - Reclamation Plan;
  - Wildlife Mitigation and Monitoring Plan; and
  - Heritage Resource Protection Plan.
- Environmental reports and permit applications in connection with mineral exploration activities collaboratively reviewed and informed by Indigenous Nation input.
- Oversight of exploration activities, including environmental monitoring and progressive reclamation of drilling locations, in collaboration with Indigenous Nation-owned or affiliated businesses.
- Ongoing contracting opportunities awarded to Indigenous Nation-owned or affiliated businesses through preferential contracting.

This collective engagement approach has enabled direct involvement by these three Indigenous Nations in shaping early planning decisions and has established a foundation for proactive, transparent collaboration. The influence of this work is reflected throughout the Project's early development, as summarized in Section 3.3. For the purposes of this EP, input provided by a particular Nation in collective discussions with Thesis and other Nations is treated as Nation-specific input, which is described in the following sections.

3.4.2 Kwadacha Nation

3.4.2.1 Background

Kwadacha Nation's traditional territory is located in the north-central interior of BC. Kwadacha Nation's main community is located at Kwadacha— sometimes referred to as Fort Ware—approximately 430 km north-northwest of Prince George at the confluence of the Fox, Kwadacha, and Finlay Rivers in the Rocky Mountain Trench, and approximately 95 km east of the Project.

Kwadacha Nation has three Reserves with a combined area of approximately 385 hectares (ha) in the vicinity of Kwadacha (CIRNAC 2025b). As of September 2025, Kwadacha Nation had a registered population of 615 people, with 315 of those people living on Kwadacha Nation's Reserve lands (CIRNAC 2025b).

3.4.2.2 Connection to the Project

It is understood that Kwadacha Nation has historically exercised its Aboriginal rights near the Project, most particularly in the vicinity of the Lawyers Site. Kwadacha Nation has ancestral ties to the Sekani, an Athapaskan-speaking people. Around 1825, roughly 200 Sekani people, divided into four regional bands, inhabited the Rocky Mountain Trench (Clark 2025). One of those bands, the Sasuchan, collectively used the headwaters of the Toodoggone River for hunting and harvesting (Clark 2025). It is understood that a substantial proportion of the population of Kwadacha Nation are descendants of the Sasuchan band (Clark 2025).

3.4.2.3 Contact Information

Key contacts and contact information for Kwadacha Nation are provided in Table 3-1.

Table 3-1: Kwadacha Nation Key Contacts and Contact Information

Contact Name	Title
Dean Marshall	Advisor
Cary McCook	Lands Director
Shawna Case	Coordinator of Lands Referrals
Address and Contact Information	
Kwadacha Nation PO Box 86 Fort Ware, BC V0J 3B0 Phone: 251-471-2701 Email: reception@kwadacha.com	

3.4.2.4 Agreements

This section summarizes known agreements that may inform Kwadacha Nation's participation in the EA or engagement with Thesis with respect to the Project.

Government Agreements

In February 2024, Kwadacha Nation and the Government of BC signed a Reconciliation Framework Agreement. The agreement establishes a negotiation process between the parties with the objective of advancing long-term reconciliation and co-developing decision-making frameworks in areas including, among other things, land use and economic development (Kwadacha Nation and BC Gov 2024).

Kwadacha Nation is negotiating independently with the governments of Canada and BC outside the BC Treaty Process (BC Gov 2024a). Thesis is aware that Kwadacha Nation has several other agreements with the Government of BC related to natural resource use; these are understood to be project- or industry-specific and are therefore not thought to be directly relevant to the EA.

Kwadacha Nation is a member of the Kaska Dena Council, which is collaborating with the Government of BC on the Kaska–BC Land Use Planning Project. While Thesis has not engaged with Kwadacha Nation specifically on this initiative, Thesis continues to monitor the process and remains open to understanding how outcomes of the initiative may be relevant to the Project over time.

Project Related Agreements

Thesis entered into a series of exploration agreements with Kwadacha Nation to guide cooperation and communication in relation to the mineral exploration program for the Project. The agreements outline shared expectations regarding information sharing, environmental management, cultural resource protection, and opportunities for community involvement. The agreements have provided a foundation for regular engagement and structured input from Kwadacha Nation from the early stage of Project planning and design.

Thesis has provided contracting opportunities and other economic development of Kwadacha Nation through an equity agreement, making the Nation an investor in the Project. Thesis expects that additional opportunities will be created for Kwadacha Nation and its members to increasingly participate in the regional economy as the Project advances.

3.4.2.5 Summary of Engagement To Date

Thesis and Kwadacha Nation have engaged through a range of methods, including the meetings and workshops referenced in Section 3.4.1, as well as regular email correspondence and phone discussions. Engagement with Kwadacha Nation has been extensive and ongoing over several years. Engagement activities have included: regular meetings, site visits, community events, and correspondence. This engagement has helped towards building familiarity, establishing clear communication channels, and informing key aspects of Project planning and environmental stewardship.

In addition to the agreements summarized above, recent collaborative efforts have focused on gathering feedback related to Project planning and design, as well as on the drafts of the IPD and EP:

- **Environmental Stewardship Workshop (October 2024)**: Thesis met with representatives of Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation to discuss how their stewardship goals and Indigenous Knowledge could inform existing conditions studies, helping to shape how these studies are reflected in the IPD and the EP's approach to collaborative engagement.
- **Input on Secondary Sources (November 2024)**: Thesis shared a preliminary list of proposed secondary sources pertaining to Kwadacha Nation to inform descriptions of the Nation in the IPD and EP, and invited review and additions to support the accuracy and completeness of the information.
- **EA Process Presentation (December 2024)**: Thesis provided an overview presentation on the provincial and federal EA processes, outlining Nation involvement opportunities, timelines, and how engagement would be carried out through Early Engagement and subsequent stages.
- **Co-Design Workshop (June 2025)**: Thesis held and attended an in-person workshop with Kwadacha Nation representatives and members to gather input on Project components with design flexibility, such as the TSF, waste rock storage facilities, accommodations complex, and transmission line. Nation perspectives were integrated into the evaluation of design options for the Pre-Feasibility Study, and action items for future engagement were identified.
- **Notification and Capacity Support (June 2025)**: Thesis notified Kwadacha Nation of Thesis' intent to provide draft IPD and EP materials for review in the near future, and provided capacity funding to support the process, bridging to a future EA collaboration/capacity funding agreement.
- **Advance Review of Draft IPD and EP (September 2025)**: Thesis shared working drafts of the IPD and EP ahead of submission to regulators, and invited a collaborative review supported by meetings to discuss Kwadacha Nation's feedback.
- **Response to Feedback on IPD and EP (October 2025)**: Thesis considered Kwadacha Nation's feedback and engaged with the Nation to discuss how its input was incorporated into the IPD and EP, as well as how it will be addressed in future work.

Feedback received through these engagement efforts, and how Thesis has addressed or plans to address that feedback, is summarized in Table 3-2 below.

Table 3-2: Summary of Kwadacha Nation Interest or Feedback in the Project and How Thesis has Responded

Topic	Indigenous Interest/Key Feedback	How Thesis Responded	Current Status/Next Steps
Aquatic	Collect aquatic existing conditions data from Toodoggone Lake, situated approximately 30 kilometres from the Project.	Completed Toodoggone Lake characterization study to supplement the Aquatic existing conditions study.	Data collected will be considered in the Environmental Assessment (EA).
Archaeological and heritage resources	Identify and protect archaeological and heritage resources that may be affected by Project activities.	• Developed a Heritage Resource Protection Plan for exploration activities. • Completed Archaeological Overview Assessment for exploration activities, including data sharing and site ground truthing. • Conducted Preliminary Field Reconnaissance site visits with participation from Kwadacha Nation representatives.	Collaboration with Kwadacha Nation on the identification and protection of archaeological and heritage resources will continue throughout the Project's duration.
Capacity funding	Require capacity funding to support engagement on matters related to Project design and the EA process.	Capacity funding is provided to support Kwadacha Nation's engagement with Thesis, including in relation to ongoing exploration activities, environmental monitoring and studies, and the EA.	Engagement regarding capacity funding will continue throughout the EA process.
Culturally sensitive areas	An initially proposed location for the Tailings Storage Facility (TSF) was situated in an area deemed culturally sensitive.	The proposed TSF location was changed to avoid impacting the identified culturally sensitive area.	Thesis will continue to engage with Kwadacha Nation to identify culturally sensitive areas and explore opportunities to mitigate potential effects.
Economic development	Interest in economic opportunities related to the Project.	• Established a Business Opportunities Committee with Kwadacha Nation representatives, through which contracting opportunities have been awarded to Kwadacha Nation. • Supported Kwadacha Nation's equity investment in the Project. • Participated in Kwadacha Nation Career Fair.	Thesis will continue to engage with Kwadacha Nation regarding Project benefits and economic opportunities.
Mining method	Potential effects of developing mineral resources exclusively through open pit mining methods.	Completed an evaluation of the feasibility of using alternative mining methods. Underground mining methods have been identified as feasible at the Lawyers Site and will be used where practicable.	Thesis continues to evaluate mining methods through its Pre-Feasibility Study.
Project design	Interest in providing input on specific Project elements. For example, requested a Best Available Technology (BAT) Study be conducted for the TSF.	Opportunities for input provided to date include: • A BAT study was completed for the TSF and a workshop hosted to discuss findings. • Co-Design Workshop with Kwadacha Nation to gather input on mine infrastructure options with design flexibility. • Early review of the IPD. Feedback from Kwadacha Nation has informed Project design, including: • Location of the TSF. • Transmission line routing. • Access road alignment.	Ongoing engagement with Kwadacha Nation regarding Project design through the development of the Pre-Feasibility Study.
Reclamation	Potential effects of Project activities on the land and the potential spread of non-native, invasive plant species.	• An annual native seed collection workshop is hosted to support use of native plants in future reclamation. • Equipment used on site is cleaned to avoid introduction of invasive species.	The EA will assess the potential effects of the Project, including invasive plants, and propose mitigations for reducing potential effects. Reclamation and end land use planning will be informed by engagement with Kwadacha Nation and will prioritize the use of native species.

Topic	Indigenous Interest/Key Feedback	How Thesis Responded	Current Status/Next Steps
Wildlife	Potential effects of Project activities on caribou, grizzly bears, stone sheep, mountain goats, marmot, and other wildlife.	• Data collection for the wildlife existing conditions study, including a network of 80 remote cameras. • Developed a Wildlife Monitoring and Management Plan and Caribou Mitigation Strategy for exploration activities in collaboration with Kwadacha Nation. • Held an Environmental Stewardship Workshop with Kwadacha Nation to discuss ongoing work. • Provided a letter of support and committed funding to a regional caribou study proposed by Kwadacha Nation. Mitigations currently in place for exploration activities include: • Flight paths are planned to minimize potential effects from noise. • Restricting mechanized work during the caribou calving period.	The EA will include an assessment of potential effects on wildlife and wildlife habitat. Input from Kwadacha Nation will help inform the identification of mitigation measures to address any potential effects.

3.4.3 Tsay Keh Dene Nation

3.4.3.1 Background

Tsay Keh Dene Nation's traditional territory is located in the north-central interior of BC. Tsay Keh Dene Nation's main community is located at Tsay Keh Dene, approximately 360 km north-northwest of Prince George at the mouth of the Finlay River, where it enters Williston Reservoir approximately 145 km southeast of the Project.

Tsay Keh Dene Nation has six Reserves with a combined area of approximately 1,443 ha in the vicinity of Tsay Keh Dene (CIRNAC 2025e). As of September 2025, Tsay Keh Dene Nation had a registered population of 522 people, with 225 of those people living on Tsay Keh Dene Nation's Reserve lands or Crown lands to which Tsay Keh Dene Nation also holds rights (CIRNAC 2025e).

3.4.3.2 Connection to the Project

It is understood that Tsay Keh Dene Nation has historically exercised its Aboriginal rights near the Project, particularly in the vicinity of the Lawyers Site. Tsay Keh Dene Nation's ancestry is principally tied to the Sekani, an Athapaskan-speaking people. Around 1825, roughly 200 Sekani people, divided into four regional bands, inhabited the Rocky Mountain Trench (Clark 2025). One of those bands, the Sasuchan, collectively used the headwaters of the Toodoggone River for hunting and harvesting (Clark 2025). It is understood that Tsay Keh Dene Nation have a strong ancestral connection to the Sasuchan band (Clark 2025).

3.4.3.3 Contact Information

Key contacts and contact information for Tsay Keh Dene Nation are provided in Table 3-3.

Table 3-3: Tsay Keh Dene Nation Key Contacts and Contact Information

Contact Name	Title
Raymond Lamont	Senior Advisor
Luke Gleeson	Senior Advisor
Bradley Barnes	Lands and Resources Acting Manager
Address and Contact Information	
Tsay Keh Dene Nation 1940 – 3rd Avenue Prince George, BC V2M 1G7 Phone: 250-562-8882 Email: reception@tkdb.ca	

3.4.3.4 Agreements

This section summarizes known agreements that may inform Tsay Keh Dene Nation's participation in the EA or engagement with Thesis with respect to the Project.

Government Agreements

Tsay Keh Dene Nation is currently negotiating with the governments of Canada and BC through Stage 4 of the BC Treaty Process (BC Gov 2024b). In March 2023, Tsay Keh Dene Nation and BC signed an Incremental Treaty and Reconciliation Agreement (BC Gov 2023a). The agreement establishes a negotiation process between the parties with the objective of executing a comprehensive treaty, advancing long-term reconciliation and developing shared approaches to land and resource decision-making, including in the areas of land use and economic development (Tsay Keh Dene First Nation and BC Gov. 2023).

Tsay Keh Dene Nation is also a signatory to a 2020 Environmental Stewardship Initiative Agreement with the Province, which provides a framework for collaboratively assessing cumulative effects and supporting ecosystem-based stewardship planning through the integration of Indigenous Knowledge and science (Tsay Keh Dene Nation and BC Gov 2020).

Thesis is aware that Tsay Keh Dene Nation has several other agreements with the Government of BC related to natural resource use; these are understood to be project or industry-specific and are therefore not thought to be directly relevant to the EA.

Project Related Agreements

Thesis entered into a series of exploration agreements with Tsay Keh Dene Nation to guide cooperation and communication in relation to the mineral exploration program for the Project. The agreements outline shared expectations regarding information sharing, environmental management, cultural resource protection, and opportunities for community involvement. The agreements have provided a foundation for regular engagement and structured input from Tsay Keh Dene Nation from the earliest stages of Project planning and design.

Thesis and Tsay Keh Dene Nation concluded an EA Collaboration Agreement to guide how the parties will work together through the EA. The EA agreement establishes a framework for communication, technical review and input, and integration of Indigenous Knowledge and traditional use information into the EA. It also sets out objectives, roles, and funding to support the Nation's participation and how collaboration will occur at key EA milestones. The EA agreement reflects a shared commitment to transparency, responsive engagement, and an ongoing consideration of Tsay Keh Dene Nation's perspectives throughout the EA.

Thesis has provided contracting opportunities and other economic development of Tsay Keh Dene Nation through an equity agreement, making the Nation an investor in the Project. Thesis expects that additional opportunities will be created for Tsay Keh Dene Nation and its members to increasingly participate in the regional economy as the Project advances.

3.4.3.5 Summary of Engagement To Date

Thesis and Tsay Keh Dene Nation have engaged through a range of methods, including the meetings and workshops referenced in Section 3.4.1, as well as regular email correspondence and phone discussions. Engagement with Tsay Keh Dene Nation has been extensive and ongoing over several years. Engagement activities have included: regular meetings, site visits, community events, and correspondence.
This engagement has helped towards building familiarity, establishing clear communication channels, and informing key aspects of Project planning and environmental stewardship.

In addition to the agreements summarized above, recent collaborative efforts have focused on gathering feedback related to Project planning and design, as well as on the drafts of the IPD and EP:

- **Environmental Stewardship Workshop (October 2024)**: Thesis met with representatives of Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation to discuss how their stewardship goals and Indigenous Knowledge could inform existing conditions studies, helping to shape how these studies are reflected in the IPD and the EP's approach to collaborative engagement.
- **Input on Secondary Sources (November 2024)**: Thesis shared a preliminary list of proposed secondary sources pertaining to Tsay Keh Dene Nation to inform descriptions of the Nation in the IPD and EP and invited review and additions to support the accuracy and completeness of the information.
- **EA Process Presentation (December 2024)**: Thesis provided an overview presentation on the provincial and federal EA processes, outlining Nation involvement opportunities, timelines, and how engagement would be carried out through Early Engagement and subsequent stages.
- **Co-Design Workshop (June 2025)**: Thesis held an in-person workshop with Tsay Keh Dene Nation representatives and members to gather input on Project components with design flexibility, such as the TSF, waste rock storage facilities, accommodations complex, and transmission line. Nation perspectives were integrated into the evaluation of design options for the Pre-Feasibility Study, and action items for future engagement were identified.
- **Notification and Capacity Support (June 2025)**: Thesis notified Tsay Keh Dene Nation of Thesis' intent to provide draft IPD and EP materials for review in the near future, and provided capacity funding to support the process, bridging to a future EA collaboration/capacity funding agreement.
- **Advance Review of Draft IPD and EP (September 2025)**: Thesis shared working drafts of the IPD and EP ahead of submission to regulators, and invited a collaborative review supported by meetings to discuss Tsay Keh Dene Nation's feedback.
- **Response to Feedback on IPD and EP (October 2025)**: Thesis considered Tsay Keh Dene Nation's feedback and engaged with the Nation to discuss how its input was incorporated into the IPD and EP, as well as how it will be addressed in future work.

Feedback received through these engagement efforts, and how Thesis has addressed or plans to address that feedback, is summarized in Table 3-4 below.

Table 3-4: Summary of Tsay Keh Dene Nation Interest or Feedback in the Project and How Thesis has Responded

Topic	Indigenous Interest/Key Feedback	How Thesis Responded	Current Status/Next Steps
Access to site	Reactivation of the access road to the Project could facilitate an increase in public access to the area. Increased public access has the potential to impact traditional use activities in the area and impact wildlife. Project activities may also impede access to the area by Tsay Keh Dene Nation members.	There is a gate on the access road to limit public entry. Access is provided to Tsay Keh Dene Nation members to areas within Thesis' mineral claims, subject to operational and safety requirements.	Access management will continue throughout the life of the Project.
Aquatic	Collect aquatic existing conditions data from Toodoggone Lake, situated approximately 30 kilometres from the Project.	Completed Toodoggone Lake characterization study to supplement the Aquatic existing conditions study.	Data collected will be considered in the Environmental Assessment (EA).
Archaeological and heritage resources	Identify and protect archaeological and heritage resources that may be affected by Project activities, including Culturally Modified Trees.	• Developed a Heritage Resource Protection Plan for exploration activities. • Completed Archaeological Overview Assessment for exploration activities, including data sharing and a ground truthing site visit. • Conducted Preliminary Field Reconnaissance site visits with participation from Tsay Keh Dene Nation representatives.	Collaboration with Tsay Keh Dene Nation on the identification and protection of archaeological and heritage resources will continue throughout the Project's duration.
Capacity funding	Require capacity funding to support engagement on matters related to Project design and the EA process.	Capacity funding is provided to support Tsay Keh Dene Nation's engagement with Thesis, including in relation to ongoing exploration activities, environmental monitoring and studies, and the EA.	Engagement regarding capacity funding will continue throughout the EA process.
Culturally sensitive areas	An initially proposed location for the Tailings Storage Facility (TSF) was situated in an area deemed culturally sensitive.	The proposed TSF location was changed to avoid impacting the identified culturally sensitive area.	Thesis will continue to engage with Tsay Keh Dene Nation to identify culturally sensitive areas and explore opportunities to mitigate potential effects.
Cumulative effects	Management of cumulative effects of resource development in the Toodoggone Region.	Prioritizes drilling on previously disturbed land, limits the number of un-reclaimed drill sites at a given time, and implements progressive reclamation to limit surface disturbance.	Thesis will continue to seek input from Tsay Keh Dene Nation to inform the assessment of potential cumulative effects.
Economic development	Interest in economic opportunities related to the Project.	• Established a Business Opportunities Committee, with Tsay Keh Dene Nation representation, through which substantial contracting opportunities have been awarded to Tsay Keh Dene Nation. • Supported Tsay Keh Dene Nation's equity investment in the Project. • Contracted Tsay Keh Dene Nation-owned business to undertake EA technical work.	Thesis will continue to engage with Tsay Keh Dene Nation regarding Project benefits and economic opportunities.
Mining method	Potential effects of developing mineral resources exclusively through open pit mining methods.	Completed an evaluation of the feasibility of using alternative mining methods. Underground mining methods have been identified as feasible at the Lawyers Site and will be used where practicable.	Thesis continues to evaluate mining methods through its Pre-Feasibility Study
Project design	Interest in providing input on specific Project elements. For example, requested a BAT Study be conducted for the TSF.	Opportunities for input provided to date include: • A BAT study was completed for the TSF and a workshop hosted to discuss findings. • Co-Design Workshop with Tsay Keh Dene Nation to gather input on mine infrastructure options with design flexibility. • Early review of the IPD. Feedback from Tsay Keh Dene Nation has informed Project design including: • Location of the TSF. • Transmission line routing. • Access road alignment.	Ongoing engagement with Tsay Keh Dene Nation regarding Project design through the development of the Pre-Feasibility Study.

Topic	Indigenous Interest/Key Feedback	How Thesis Responded	Current Status/Next Steps
Reclamation	Potential effects of Project activities on the land and the potential spread of non-native, invasive plant species.	• An annual native seed collection workshop is hosted to support use of native plants in future reclamation. • Equipment used on site is cleaned to avoid introduction of invasive species.	The EA will assess the potential effects of the Project, including invasive plants, and propose mitigations for reducing potential effects. Reclamation and end land use planning will be informed by engagement with Tsay Keh Dene Nation and will prioritize the use of native species.
Wildlife	Potential effects of Project activities on caribou, grizzly bears, stone sheep, mountain goats, marmot, and other wildlife.	• Data collection for the wildlife existing condition study, including a network of 80 remote cameras. • Developed a Wildlife Monitoring and Management Plan and Caribou Mitigation Strategy for exploration activities in collaboration with Tsay Keh Dene Nation. • Held an Environmental Stewardship Workshop with Tsay Keh Dene Nation to discuss ongoing work. Mitigations currently in place for exploration activities include: • Flight paths are planned to minimize potential effects from noise. • Restricting mechanized work during the caribou calving period.	The EA will include an assessment of potential effects on wildlife and wildlife habitat. Input from Tsay Keh Dene Nation will help inform the identification of mitigation measures to address any potential effects.

3.4.4 Takla Nation

3.4.4.1 Background

Takla Nation's traditional territory is located in the north-central interior of BC. Takla Nation's main community is located at Takla Landing, approximately 110 km northeast of Smithers and 235 km south-southeast of the Project.

There are 17 Takla Nation Reserves with a combined area of approximately 809 ha around Takla Lake and Bear Lake (CIRNAC 2025d). As of September 2025, Takla Nation had a registered population of 961 people, with 208 of those people living on Takla Nation's Reserve lands (CIRNAC 2025d).

3.4.4.2 Connection to the Project

Through engagement with Takla Nation on a draft of the EP, Takla Nation provided additional information that describes the Nation's historical connection to the Project area in more detail. Takla Nation indicated that this additional information is informed by the Nation's own standards and protocols, and requested that it be included in the EP. The below excerpt has been included as per Takla's request. Thesis looks forward to working with Takla Nation to build on and refine a shared understanding throughout the EA:

> *It is understood that Takla Nation has historically exercised its Aboriginal rights (including title) in and surrounding the vicinity of the Lawyers Property. Takla Nation's ancestry is traced to Sekani, Ned'u'tin, Carrier, and Gitksan peoples. The modern Takla Nation is comprised of two formerly separate bands – the Fort Connolly Band, and the North Takla Nation Band. The Fort Connolly Band was comprised of primarily Sekani people who occupied the region spanning from Bear Lake (Sustut) to the Rocky Mountain trench, known to themselves as Sustut'enne (Brown 2002; Dewhirst 1995) and to others as the Sasuchan (Jenness 1937). The Fort Connolly Band were considered Sekani by the Department of Indian Affairs (DIA). The North Takla Nation Band was comprised of Sekani, Ned'u'tin, and Carrier people who occupied the region spanning from Takla Nation Lake region to the Wolverine Range, and was described as Carrier by the DIA. The Fort Connolly and North Takla Nation bands amalgamated in 1959. The primary Takla Nation community is at Takla Nation Landing, but many members live in more isolated settlements at Bukley House, Bear Lake, Germansen Landing, and or other communities such as Prince George or Fort St. James.*
>
> *At the time of the first European exploration of what would become known as Takla Nation territory in the early 19th century, the only Indigenous people occupying the region between Bear Lake and the Rocky Mountain Trench (where the Finlay River turns south) were Sekani (Rich 1955). This includes Samuel Black's exploration of the headwaters of the Finlay River in AD 1824 from the east (Rich 1955), and Waccan Boucher's exploration of Takla Nation Lake and Bear Lake in AD 1826 from the south (HBCA 1826). Fort Connolly was established in AD 1827 to trade furs from the Sekani people who occupied the region between Bear Lake and the Finlay River (HBCA 1827).*

Sekani people, ancestral to many members of Takla Nation are known to have harvested resources in the region between Bear Lake and the Rocky Mountain Trench from the early 19th century to the mid-20th century (at least) as part of their highly mobile way of life (HBCA 1826; HBCA 1830; Morice 1897; Rich 1955; Walkem 1914).

With the closure of Fort Connolly in AD 1892, the Sustut'enne (Bear Lake Sekani) largely moved east to Fort Graham, and northeast, to the Spatzisi Plateau (Caribou Hide and Metsantan) (Canada 1921; Friesen 1983; McIlwraith 2012; Sheppard 1983). In addition to the Bob Patrick family, and his brother's family (Dennis Louis), at least two family heads listed on the AD 1921 Canada Census for "Stikine Headwaters" (i.e., Caribou Hide/Metsantan) are indicated as being from Bear Lake (Canada 1921). These two communities became the headquarters for families who continued to hunt and trap in this region, inclusive of the Lawyers Ranch area.

The people living in the Caribou Hide and Metsantan communities relocated to other locations around AD 1948. Members of the Bob Patrick family (and his brother Dennis Louis) relocated to or returned to Bear Lake, became members of the Fort Connolly Band, and the descendants of that family are members of the modern Takla Nation. The area immediately south (approximately 20 km) of the Lawyers Ranch project has been described as the Bob Patrick family keyah (or traditional harvesting area) (Dewhirst 1995, 2006, 2007). This family keyah has been split into three traplines (TL 739T006, TL 618T003, and Patrick/Thomas trapline) amongst this family, and have been held since at least AD 1943. It is notable that there are no registered traplines immediately north of TL 739T006, likely on account of the former big game outfitter there (e.g., Walker 1970), and subsequent protection as a provincial park and wilderness area.

Based on available evidence, the Lawyers Ranch project area was within the territory that was exclusively occupied and utilized by Sekani people in the early 19th century, and more specifically by the Sekani group known as the Sustut'enne or Sasuchan. A core group of this community are ancestors to much of the modern Takla Nation. Additionally, in the early to mid 20th century, Sekani people ancestral to modern Takla Nation (i.e., the Bob Patrick family) lived in the vicinity of the Lawyers Ranch project, and hunted and trapped in that region. The Bob Patrick family holds a traditional keyah and a trapline immediately south of the Lawyers Ranch project, and may undertake resource harvesting activities in the vicinity of that project.

The above information is consistent with the preliminary findings of the Clark (2025) report. As per the Clark report, it is understood that Takla Nation has historically exercised its Aboriginal rights near the Project, particularly in the vicinity of the Lawyers Property. Takla Nation's ancestry is traced to both the Sekani and Carrier peoples. Before 1800, the southern portion of Takla Lake was primarily inhabited by Carrier people (Clark 2025). Over time, Sekani families began to settle in the area and intermarry with the local Carrier population (Clark 2025).

In 1959, the federal Department of Indian Affairs amalgamated the Takla Lake Band (of Carrier origin) and the Bear Lake (Fort Connelly) Band (linked to the Sasuchan Band, of Sekani origin) into what is now known as Takla Nation (Clark 2025).

The historical record indicates a strong connection between Takla Nation and the headwaters of the Finlay River. There is some evidence that Takla Nation's Carrier ancestors travelled and hunted in the Finlay River region (Clark 2025).
More substantial evidence demonstrates the use and occupancy of Thutade Lake, located about 40 km southeast of the Project, by Takla Nation's Sekani ancestors, including members of the Sasuchan Band (Clark 2025). The Project is located within the Toodoggone River watershed, which also forms part of the Finlay River headwaters (Clark 2025).

3.4.4.3 Contact Information

Key contacts and contact information for Takla Nation are provided in Table 3-5.

Table 3-5: Takla Nation Key Contacts and Contact Information

Contact Name	Title
Terry Kuzma	Senior Advisor
Evan MacKinnon	Director, Lands and Stewardship
Tessa Lewis	Mining and Special Project Lead
Address and Contact Information	
Takla Nation 510 Carney St Prince George, BC V2M 2K6 Phone: 250-549-9321 Email: reception@taklafn.ca	

3.4.4.4 Agreements

This section summarizes known agreements that may inform Takla Nation's participation in the EA or engagement with Thesis with respect to the Project.

Government Agreements

Takla Nation is currently negotiating with the governments of Canada and BC through Stage 4 of the BC Treaty Process (BC Gov 2023c).

Thesis is aware that Takla Nation has several agreements with the Government of BC related to natural resource use; these are understood to be project or industry-specific or expired and are therefore not thought to be directly relevant to the EA.

As part of Takla Nation's review of the IPD, Takla shared that it is in ongoing settlement discussions with Canada that may result in the attribution of additional Reserves to Takla Nation.

Project Related Agreements

Thesis entered into a series of exploration agreements with Takla Nation to guide cooperation and communication in relation to the mineral exploration program for the Project. The agreements outline shared expectations regarding information sharing, environmental management, cultural resource protection, and opportunities for community involvement. The agreements have provided a foundation for regular engagement and structured input from Takla Nation from the earliest stages of Project planning and design.

Thesis is in discussions with Takla Nation concerning an agreement to guide how the parties will work together through the EA.

Thesis has provided contracting opportunities and other economic development of Takla Nation through an equity agreement, making the Nation an investor in the Project. Thesis expects that additional opportunities will be created for Takla Nation and its members to increasingly participate in the regional economy as the Project advances.

3.4.4.5 Summary of Engagement To Date

Thesis and Takla Nation have engaged through a range of methods, including the meetings and workshops referenced in Section 3.4.1, as well as regular email correspondence and phone discussions. Engagement with Takla Nation has been extensive and ongoing over several years, involving regular meetings, site visits, community events, and frequent correspondence. This engagement has helped build familiarity, establish clear communication channels, and inform key aspects of Project planning and environmental stewardship.

In addition to the agreements summarized above, recent collaborative efforts have focused on gathering feedback related to Project planning and design, as well as on drafts of the IPD and EP:

- **Environmental Stewardship Workshop (October 2024)**: Met with representatives of Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation to discuss how their stewardship goals and Indigenous Knowledge could inform existing conditions studies, helping to shape how these studies are reflected in the IPD and the EP's approach to collaborative engagement.
- **Input on Secondary Sources (November 2024)**: Shared a preliminary list of proposed secondary sources pertaining to Takla Nation to inform descriptions of the Nation in the IPD and EP, and invited review and additions to support the accuracy and completeness of the information.
- **EA Process Presentation (December 2024)**: Provided an overview presentation on the provincial and federal EA processes, outlining Nation involvement opportunities, timelines, and how engagement would be carried out through Early Engagement and subsequent stages.
- **Co-Design Workshop (June 2025)**: Held an in-person workshop with Takla Nation representatives and members to gather input on Project components with design flexibility, such as the TSF, waste rock storage facilities, accommodations complex, and transmission line. Nation perspectives were integrated into the evaluation of design options for the Pre-Feasibility Study, and action items for future engagement were identified.

- **Notification and Capacity Support (June 2025)**: Notified Takla Nation of Thesis' intent to provide draft IPD and EP materials for review in the near future, and provided capacity funding to support the process, bridging to a future EA collaboration/capacity funding agreement.
- **Advance Review of Draft IPD and EP (September 2025)**: Shared working drafts of the IPD and EP ahead of submission to regulators, and invited a collaborative review supported by meetings to discuss Takla Nation's feedback.
- **Response to Feedback on IPD and EP (October 2025)**: Considered Takla Nation's feedback and engaged with the Nation to discuss how its input was incorporated into the IPD and EP, as well as how it will be addressed in future work.

Feedback received through these engagement efforts, and how Thesis has addressed or plans to address that feedback, is summarized in Table 3-6 below.

Table 3-6: Summary of Takla Nation Interest or Feedback in the Project and How Thesis has Responded

Topic	Indigenous Interest/Key Feedback	How Thesis Responded	Current Status/Next Steps
Access to site	Reactivation of the access road to the Project could facilitate an increase in public access to the area. Increased public access has the potential to impact traditional use activities in the area and impact wildlife. Project activities may also impede access to the area by Takla Nation members.	There is a gate on the access road to limit public entry. Access is provided to Takla Nation members to areas within Thesis' mineral claims, subject to operational and safety requirements.	Access management will continue throughout the life of the Project.
Aquatic	Collect aquatic existing data from Toodoggone Lake, situated approximately 30 kilometres from the Project.	Thesis commissioned a targeted aquatic study for the lake, conducted collaboratively with Indigenous Nations.	Data collected will be considered in the Environmental Assessment (EA).
Archaeological and heritage resources	Identify and protect archaeological and heritage resources that may be affected by Project activities, including Culturally Modified Trees.	• Developed a Heritage Resource Protection Plan for exploration activities. • Completed Archaeological Overview Assessment for exploration activities, including data sharing and a ground truthing site visit. • Conducted Preliminary Field Reconnaissance site visits with participation from Takla Nation representatives.	Collaboration with Takla Nation on the identification and protection of archaeological and heritage resources will continue throughout the Project's duration.
Capacity funding	Require capacity funding to support engagement on matters related to Project design and the EA process.	Capacity funding is provided to support Takla Nation's engagement with Thesis, including in relation to ongoing exploration activities, and environmental monitoring and studies. Thesis is in discussions with Takla Nation regarding capacity funding for the EA.	Engagement regarding capacity funding will continue throughout the EA process.
Culturally sensitive areas	An initially proposed location for the Tailings Storage Facility (TSF) was situated in an area deemed culturally sensitive.	The proposed TSF location was changed to avoid impacting the identified culturally sensitive area.	Thesis will continue to engage with Takla Nation to identify culturally sensitive areas and explore opportunities to mitigate potential effects.
Cumulative effects	Management of cumulative effects of resource development in the Toodoggone Region.	Prioritizes drilling on previously disturbed land, limits the number of un-reclaimed drill sites at a given time, and implemented progressive reclamation to limit surface disturbance.	Thesis will continue to seek input from Takla Nation to inform the assessment of potential cumulative effects.
Economic development	Interest in economic opportunities related to the Project.	• Established a Business Opportunities Committee, with Takla Nation representation, through which contracting opportunities have been awarded to Takla Nation. • Supported Takla Nation's equity investment in the Project. • Facilitated Takla Nation's acquisition of a mobile assay lab to generate business from the Project and broader region. • Participated in Takla Nation's Natural Resources Summit.	Thesis will continue to engage with Takla Nation regarding Project benefits and economic opportunities.
Hunting	Project proximity to areas of value for hunting.	• Engaged with Takla Nation to identify areas of value to hunting near the Project. • Conducting studies on wildlife and wildlife habitat with participation from Takla Nation and Takla Nation-affiliated businesses.	Thesis will continue to engage with Takla Nation to understand and address potential effects of the Project on hunting and related land use. Input from Takla Nation will help inform mitigation planning and support efforts to avoid or reduce disruption to important hunting areas.
Mining method	Potential effects of developing mineral resources exclusively through open pit mining methods.	Completed an evaluation of the feasibility of using alternative mining methods. Underground mining methods have been identified as feasible at the Lawyers Site and will be used where practicable.	Thesis continues to evaluate mining methods through its Pre-Feasibility Study.

Topic	Indigenous Interest/Key Feedback	How Thesis Responded	Current Status/Next Steps
Project design	Interest in providing input on specific Project elements. For example, requested a) BAT Study be conducted for the TSF.	Opportunities for input provided to date include: • A BAT study was completed for the TSF and a workshop hosted to discuss findings. • Co-Design Workshop with Talka Nation to gather input on mine infrastructure options with design flexibility. • Early review of the IPD. Feedback from Takla Nation has informed Project design including: • Location of the TSF. • Transmission line routing. • Access road alignment.	Ongoing engagement with Takla Nation regarding Project design through the development of the Pre-Feasibility Study.
Reclamation	Potential effects of Project activities on the land and the potential spread of non-native, invasive plant species.	• An annual native seed collection workshop is hosted to support use of native plants in future reclamation. • Equipment used on site is cleaned to avoid introduction of invasive species.	The EA will assess the potential effects of the Project, including invasive plants, and propose mitigations for reducing potential effects. Reclamation and end land use planning will be informed by engagement with Takla Nation and will prioritize the use of native species.
Wildlife	Potential effects of Project activities on caribou, grizzly bears, stone sheep, mountain goats, marmot, and other wildlife.	• Data collection for the wildlife existing conditions study, including a network of 80 remote cameras. • Developed a Wildlife Monitoring and Management Plan and Caribou Mitigation Strategy for exploration activities in collaboration with Takla Nation. • Held an Environmental Stewardship Workshop with Takla Nation to discuss ongoing work. Mitigations currently in place for exploration activities include: • Flight paths are planned to minimize potential effects from noise. • Restricting mechanized work during the caribou calving period.	The EA will include an assessment of potential effects on wildlife and wildlife habitat. Input from Takla Nation will help inform the identification of mitigation measures to address any potential effects.

3.4.5 Tahltan Nation

Thesis shared working drafts of the IPD and EP with Tahltan Nation ahead of submission to regulators and invited collaboration by offering meetings to discuss Tahltan's feedback. Tahltan Nation indicated they were focused on other EA processes for other Projects and would be unable to review the documents within the requested timeframe. Thesis subsequently reached out on multiple occasions to offer support and invite preliminary input, including on specific sections of interest; however, no comments were received prior to submission. Thesis looks forward to engaging with Tahltan Nation on the IPD and EP through Early Engagement. Feedback received will be addressed in collaboration with Tahltan Nation through future EA deliverables and engagement activities, as appropriate.

3.4.5.1 Background

Tahltan Nation's traditional territory is located in the northwestern interior of BC. Tahltan Nation is comprised of two bands: the Tahltan Band and the Iskut Band. The Tahltan Central Government (TCG) is the central administrative governing body for both bands.

Tahltan Nation Bands and Administration

Tahltan Band

The Tahltan Band's main community is located on the Stikine River at Telegraph Creek, approximately 225 km east-northeast of the Project. The Tahltan Band has 13 Reserves with a combined area of approximately 1,377 ha (CIRNAC 2025c). With the exception of one Reserve in the upper Taku River watershed and another on Dease Lake, the Tahltan Band's Reserves are mainly grouped along a 30-km stretch of the Stikine River upstream of Telegraph Creek. As of September 2025, the Tahltan Band had a registered population of 2,218 people, with 299 of those people living on the Band's own Reserve lands (CIRNAC 2025c).

Iskut Band

The Iskut Band's main community is at Kluachon Lake, approximately 68 km east of Telegraph Creek and 157 km east-northeast of the Project. The Iskut Band has three reserves totalling approximately 162 ha, two of which are on Kluachon Lake and one of which is on the Stikine River opposite Telegraph Creek (CIRNAC 2025a). As of May 2025, the Iskut Band had a registered population of 827 people, with 341 people living on the Band's own Reserve lands (CIRNAC 2025a).

Tahltan Central Government

The TCG is responsible for the governance of Tahltan Nation in relation to its Aboriginal title and rights. Its purpose is to protect these rights and the ecosystems and natural resources of Tahltan traditional territory through sustainable economic development, and to strengthen the cultural wellness of Tahltan Nation community members (TCG n.d.).

3.4.5.2 Connection to the Project

The Project is located near the southeast boundary of Tahltan Nation's traditional territory. It is understood that Tahltan Nation has historically exercised its Aboriginal rights near the Project, particularly in the vicinity of the Ranch Site.

The Tahltan Band have been historically linked to the headwaters of Metsantan Creek, on the west side of the continental divide, where part of the Ranch Site is located (Clark 2025).

Available records indicate that the Iskut Band's ancestry is linked to the Sekani people of Bear Lake, with ties to the Sasuchan band (Clark 2025). Over time, these Bear Lake people began to form trade relationships and intermarry with Tahltan at Telegraph Creek, forming a community of their own at the opposite side of the Stikine River (Clark 2025). Around 1962, conflict between the two communities resulted in the Bear Lake people relocating to Kluachon Lake, where the community of Iskut is now located (Clark 2025).

3.4.5.3 Contact Information

Key contacts and contact information for Tahltan Nation are included in Table 3-7.

Table 3-7: Tahltan Nation Key Contacts

Contact Name	Title
Rob McPhee	Senior Advisor
Connor Pritty	Lands and Regulatory Affairs Director
Blaine Lindstrom	SER Coordinator
Address and Contact Information	
Tahltan Central Government PO Box 69 Tatl'ah (Dease Lake), BC V0C 1L0 Phone: 250-771-3274 Email: reception@tahltan.org	

3.4.5.4 Agreements

This section summarizes known agreements that may inform Tahltan Nation's participation in the EA or engagement with Thesis with respect to the Project.

Government Agreements

In 2013, the TCG and BC entered into a Shared Decision-Making Agreement (Tahltan Nation and BC Gov 2013). The purpose of the agreement is to foster a government-to-government relationship that would enable the parties to collaborate on land and resource issues as a tangible step toward longer-term reconciliation of their interests (Tahltan Nation and BC Gov 2013). The agreement establishes, among other things, a framework through which the parties will participate in a shared decision-making process for land and resource matters, including EAs, throughout TCG's asserted territory (Tahltan Nation and BC Gov 2013).

The TCG is negotiating independently with Canada and BC outside the BC Treaty Process (BC Gov 2023b). Thesis is aware that TCG has several agreements with BC related to natural resource use; these are understood to be project or industry-specific or expired and are therefore not thought to be directly relevant to the EA.

Project Related Agreements

Thesis has entered into a series of exploration agreements with Tahltan Nation to guide cooperation and communication in relation to the mineral exploration program for the Project. Thesis is in discussions with Tahltan Nation concerning an agreement to guide how the parties will work together through the EA.

3.4.5.5 Summary of Engagement To Date

Thesis and Tahltan Nation have engaged through numerous methods, including email correspondence, phone discussions, and meetings over the past several years. This engagement has helped build familiarity, establish clear communication channels, and create a foundation for increased engagement as the Project advances through EA.

Recently, Thesis has sought to engage with Tahltan Nation for the purpose of receiving early review and input from the Nation on drafts of the IPD and EP. In June 2025, Tahltan Nation was notified of Thesis' intent to provide draft IPD and EP materials for review in the near future, and provided capacity funding to support the process, bridging to a future EA collaboration/capacity funding agreement. As noted above, Tahltan Nation was unable to review and provide feedback prior to formal regulatory submission. Thesis remains committed to receiving and addressing feedback in collaboration with Tahltan Nation through future EA deliverables and engagement activities, as appropriate.

Thesis and Tahltan Nation have also initiated discussions to advance a Tahltan Land Use and Occupancy Study and capacity funding agreement for EA participation. Thesis looks forward to collaborating with Tahltan Nation to further these initiatives.

Feedback received through these engagement efforts, and how Thesis has addressed or plans to address that feedback, is summarized in Table 3-8 below.

Table 3-8: Summary of Tahltan Interest in or Feedback on the Project and How Thesis has Responded

Topic	Indigenous Interest/Key Feedback	How Thesis Responded	Current Status/Next Steps
Access to site	Grant reasonable access to Thesis' mineral claims for Tahltan Nation monitors to visit the site. Concerns around the complex and often unclear road access in certain areas of BC, and the potential for being restricted or locked out of culturally important areas.	There is a gate on the access road to limit public entry. Access is provided to Tahltan Nation members to areas within Thesis' mineral claims, subject to operational and safety requirements. Thesis grants access to Tahltan Nation monitors upon request.	Access management will continue throughout the life of the Project.
Aquatic	Collect aquatic existing data from Metsantan Lake, situated approximately 5 kilometres from the Project.	Completed Metsantan Lake characterization study to supplement the Aquatic existing conditions study.	Data collected will be considered in the Environmental Assessment (EA).
Archaeological and heritage resources	Ensuring Tahltan Nation's archaeological standards and protocols are upheld onsite and a Tahltan Land Use and Occupancy Study is initiated for the Project.	• Incorporated Tahltan Nation feedback into the Heritage Inspection Permit application. • Developed a Heritage Resource Protection Plan for exploration activities. • Completed Archaeological Overview Assessment for exploration activities, including data sharing and a ground truthing site visit that Tahltan Nation was invited to participate in. • Conducted Preliminary Field Reconnaissance site visits that Tahltan Nation was invited to participate in. • Revisions were made to the Archaeological Chance Find Procedure for exploration to align with Tahltan's Archaeological Standards.	Collaboration with Tahltan Nation on the identification and protection of archaeological and heritage resources will continue throughout the Project's duration.
Capacity funding	Require capacity funding to support engagement on the Project and the EA.	Capacity funding is provided to support Tahltan Nation's engagement with Thesis, including in relation to ongoing exploration activities, and environmental monitoring.	Engagement regarding capacity funding will continue throughout the EA process.
EA process	Follow Tahltan Nation standards for EA process, including collaborating with Tahltan Heritage, Resources and Environmental Assessment Team (i.e., THREAT) and negotiating an agreement with Tahltan Nation regarding the EA prior to the EA Readiness Decision phase.	Discussions have been initiated with Tahltan Nation regarding their participation and collaboration throughout the EA process.	Thesis will continue to work collaboratively with Tahltan Nation during the EA process and recognizes Tahltan Nation's interest in having its standards and expectations reflected throughout.
Economic development	Interest in economic opportunities related to the Project, such as employment and contracting, to be offered to Tahltan Nation, where appropriate.	• Provided contracting opportunities to Tahltan Nation-owned businesses in relation to the mineral exploration program. • Participated in Tahltan Nation's annual Industry Review to characterize contracting and employment opportunities. • Exploring opportunities for Tahltan Nation equity ownership in the Project.	Thesis will continue to engage with Tahltan Nation regarding Project benefits and economic opportunities.
Engagement with community members and leadership	Site visits for leadership and Elders to see the Project site and culturally significant areas. Presentations about the Project to Tahltan Nation leadership representatives annually. Requests for engagement with leadership in Dease Lake, Iskut, and Telegraph Creek communities.	• Tahltan Nation participation, including Elders, in an annual native seed collection workshop to support use of native plants in future reclamation. • Site tours for Tahltan Nation leadership and representatives to visit the Project site. • Delivers annual presentations from Thesis senior management to Tahltan Nation leadership and representatives.	Thesis plans to visit Dease Lake, Iskut, and Telegraph Creek for further direct engagement with leadership and members in community. Engagement with Tahltan Nation will continue through site visits, leadership updates, and other opportunities to be identified in collaboration with Tahltan Nation.
Environmental stewardship	Collaborate on the development of environmental management plans. Work with Tahltan Nation technical experts on existing conditions studies and invite guardians to site for caribou stewardship programs.	• Tahltan Nation provided input into the existing management plans for exploration activities, including the Wildlife Mitigation and Monitoring Plan. • Invited Tahltan Nation technical experts to participate in existing conditions studies.	Thesis will continue to collaborate with Tahltan Nation on the development of environmental management plans and will discuss opportunities to involve for Tahltan guardians in stewardship planning and initiatives.

3.5 Other Indigenous Engagement

3.5.1 Approach to Additional Indigenous Nations

As described above in Section 3.2, BC's Consultation Areas Spatial Tool identified five additional Indigenous Nations with Consultation Areas overlapping the Project and areas of potential direct and indirect effects: Binche Whut'en, Daylu Dena, Dease River First Nation, Liard First Nation, and West Moberly First Nations. Thesis understands the Project to be at the periphery of the Consultation Areas of these Indigenous Nations, and it is not anticipated that the Project will adversely impact the exercise of Aboriginal rights or interests of these Indigenous Nations.

Thesis understands that the list of Indigenous Nations identified for engagement may change. Thesis will engage with Indigenous Nations with Aboriginal rights or interests that may be adversely impacted by the Project. Thesis will provide relevant Project information and, where appropriate, collaboratively determine the frequency and methods of engagement with such Indigenous Nations. Engagement activities will be tailored to each Indigenous Nation's interests and priorities and may include information-sharing meetings, opportunities to review and provide input on EA materials, and other methods for receiving and responding to feedback.

3.5.2 Binche Whut'en

The main Binche Whut'en community is located approximately 370 km south-southeast of the Project. It is understood that the Project lies at the periphery of Binche Whut'en's Consultation Area, and it is anticipated that the Project will not adversely impact Binche Whut'en's ability to exercise its Aboriginal rights or interests (Clark 2025).

Thesis' engagement with Binche Whut'en to date is summarized as follows:

- In early 2025, Binche Whut'en contacted Thesis to:
  - Assert that the Project falls within its traditional territory;
  - Request project information; and
  - Initiate a meeting.
- Thesis responded with relevant details concerning the location and scope of ongoing exploration activities.
- A meeting was held with a representative of Binche Whut'en's preferred environmental and economic development entities to discuss completed and planned work for 2025 and 2026.
- At the meeting:
  - Binche Whut'en's representatives indicated that their primary interest relates to economic opportunities, including participation in the EA as a contractor or subcontractor.

- The representative shared a map of Binche Whut'en's consultation area on the screen. The consultation area did not appear to overlap with the area within which mine infrastructure is being planned — with the exception of the existing Omineca Resource Road and planned routing for the transmission line, which is expected to primarily follow the existing access road.

Thesis will engage Binche Whut'en on aspects of the Project that may affect its Aboriginal rights and interests, consistent with the approach outlined in Section 2.2, Section 2.3, and Section 3.1.

3.6 Planned Indigenous Engagement

Thesis will engage with Indigenous Nations in line with the engagement approach and principles outlined in this EP. Indigenous engagement planning will continue to be refined collaboratively through feedback from Indigenous nations.

Planned engagement activities during the Early Engagement phase of the EA process are outlined in Table 3-9. These activities are intended to support transparent information-sharing, provide meaningful opportunities for input, and help shape the development of the Detailed Project Description (DPD). Due to the project's location, in an area far from human settlement, there are inherent constraints to engagement.

Table 3-9: Summary of Planned Engagement

Activity	Estimated Timing
Continued coordination with Indigenous Nations to align on preferred engagement methods and priorities for the Environmental Assessment EA process.	November 2025 to end of Process Planning
Follow-up meetings with leadership or designated representatives to discuss the Initial Project Description and Engagement Plan.	November to end of Early Engagement
Distribution of plain-language summaries and visual engagement tools (e.g., maps, posters, videos).	November 2025 to end of EA process
Continued sharing of reports and documents relating to the environmental assessment process.	November 2025 to end of EA process
Ongoing updates through a dedicated Project website and social media channels.	November 2025 to end of EA process
Support for Indigenous Nation participation in the BC Environmental Assessment Office-led public information sessions, where appropriate.	Q4 2025 to end of EA process

Input and feedback received during Early Engagement will be tracked using structured engagement logs and issue-response tables. These tools will document questions, concerns, and suggestions, and will inform the development of the DPD and, where appropriate, Project planning and design. Where possible, Thesis will work with Indigenous Nations to review early drafts or discuss preliminary content and will provide summaries of how feedback was considered and addressed in Project planning and design.

4.0 Government Agencies

Thesis recently commenced engagement with applicable regional districts and municipalities. Engagement is an integral part of the EA process, and ongoing engagement with relevant regional districts and municipalities will be ongoing throughout the EA process.

Agencies with a direct interest in the Project will participate in the Technical Advisory Committee (TAC) led by the EAO, and several agencies also have permitting authorities over the Project. The relevant federal and provincial agencies are outlined in Table 4-1. Thesis will work in collaboration with the EAO to confirm the appropriate agency contacts for engagement.

Thesis' objectives for engaging with federal and provincial government agencies include:

- Develop collaborative relationships between Thesis and respective agencies.
- Receive support for efficient EA and permitting processes.
- Collaborate throughout the EA process and work to address and incorporate any feedback and concerns.
- Identify authorizations and permits required for the Project and help ensure Thesis is meeting the required regulatory requirements.

This list of government agencies is preliminary and will be refined throughout the Early Engagement phase.

Table 4-1: Identified Provincial and Federal Government Agencies

Government	Agency
Provincial	Environmental Assessment Office
	Ministry of Environment and Parks
	Ministry of Forests
	Ministry of Indigenous Relations and Reconciliation
	Ministry of Jobs, Economic Development and Innovation
	Ministry of Mining and Critical Minerals
	Ministry of Transportation and Transit
	Ministry of Water, Land and Resource Stewardship
	Northern Health
Federal	Impact Assessment Agency of Canada
	Crown Indigenous Relations and Northern Affairs Canada
	Environment and Climate Change
	Fisheries and Oceans Canada
	Indigenous Services Canada

Government	Agency
	Natural Resources Canada
	Transport Canada

4.1 Local Government

The Project is located in the electoral districts of Peace River North and Bulkley Valley-Stikine. Thesis will continue to engage with local governments that may experience potential effects of the Project, including changes to local demographics, employment, the local economy, and infrastructure and services. These local governments may include the Peace River Regional District, the District of Mackenzie, the Town of Smithers, and the City of Prince George. See Table 4-2 summarizing local governments and contacts for the Project to date. This list may be updated through engagement with government agencies during the early engagement phase of the assessment process.

Table 4-2: List of Government Contacts

Government	Contacts
Peace River Regional District	Shawn Dahlen, CAO
	Shawn.Dahlen@prrd.bc.ca
	(250) 784-3208
	Ashley Murphey, GM of Development Services
	Ashley.Murphey@prrd.bc.ca
	(250) 785-8084
District of Mackenzie	Diane Smith, CAO
	diane@districtofmackenzie.ca
	(250) 997-3221 ext. 230
Town of Smithers	Michael Dewar, CAO
	mdewar@smithers.ca
	Michan McKinley, Assistant
	mmckinley@smithers.ca
City of Prince George	Walter Babicz, City Manager
	walter.babicz@princegeorge.ca
	Joan Switzer, Assistant
	joan.switzer@princegeorge.ca

To date, Thesis has held initial meetings with local governments to introduce the Project, outline the regulatory process, and discuss the approach to ongoing engagement. A summary of engagement to date is provided in Table 4-3. Engagement is an integral part of the EA process, and discussions with relevant local governments, including with health authorities, will continue throughout the EA

process. The Project is located outside of municipal boundaries, and Thesis is unaware of any regional or local government plans that are relevant to the environmental assessment.

Table 4-3: Summary of Engagement with Local Governments

Date	Local Government	Summary of Engagement	Key Points and Actions
22-Oct-25	Town of Smithers	Introductory meeting between Thesis and the Town of Smithers.	Discussion focused on Project introduction, anticipated regulatory process, and approach to ongoing engagement.
23-Oct-25	District of Mackenzie	Introductory meeting between Thesis and the District of Mackenzie.	Discussion focused on Project introduction, anticipated regulatory process, and approach to ongoing engagement.
24-Oct-25	Peace River Regional District	Introductory meeting between Thesis and the Peace River Regional District.	Discussion focused on Project introduction, anticipated regulatory process, and approach to ongoing engagement. Potential meeting to be set with the Regional Board to formally present the Project.
29-Oct-25	City of Prince George	Introductory meeting between Thesis and the City of Prince George.	Discussion focused on Project introduction, anticipated regulatory process, and approach to ongoing engagement.

4.2 Summary of Engagement Activities with Provincial and Federal Government Agencies to Date

Thesis is engaging with provincial and federal agencies regarding requirements to initiate regulatory review. A summary of this engagement is provided in Table 4-4.

Table 4-4: Summary of Engagement with Federal and Provincial Governments

Date	Agencies	Summary of Engagement	Key Points and Actions
16-Jun-25	Environmental Assessment Agency (EAO), Ministry of Mining and Critical Minerals, Ministry of Environment and Parks	Introductory meeting between Thesis and provincial agencies to introduce the Project and to discuss initiating regulatory review in Fall 2025.	Discussion focused on Project introduction, opportunities for regulatory efficiency and predictability, and EAO's upcoming review of the Initial Project Description (IPD) and Engagement Plan (EP).
29-Jul-25	Impact Assessment Agency of Canada (IAAC)	Introductory meeting between Thesis and IAAC to introduce the Project to IAAC officials and to discuss initiating regulatory review in Fall 2025.	Discussion focused on Project introduction, opportunities for regulatory efficiency and predictability, and IAAC's upcoming review of the IPD.
02-Sep-25	EAO	Thesis shared a preliminary working draft IPD and EP with EAO for review.	Not applicable.
02-Sep-25	IAAC	Thesis shared a preliminary working draft IPD with IAAC for review.	Not applicable.
03-Sep-25	EAO	Thesis met with EAO to discuss Project details as well as collaboration and next steps to prepare for initiating Early Engagement.	Alignment on EAO's draft IPD/EP review. Meeting was set with EAO and IAAC on October 9, 2025, to discuss steps for initiating process.
04-Sep-25	IAAC	Thesis met with IAAC to discuss collaboration and next steps for IPD review.	Not applicable.
05-Sep-25	EAO	EAO provided initial feedback on Thesis' preliminary drafts of the IPD and EP.	Thesis made applicable changes in the IPD and EP in advance of filing.
12-Sep-25	IAAC	IAAC provided initial feedback on Thesis' preliminary drafts of the IPD.	Thesis made applicable changes in the IPD in advance of filing.
09-Oct-25	EAO and IAAC	Thesis met with EAO and IAAC to discuss next steps for initiating Early Engagement.	Regular meetings initiated with Thesis, EAO, and IAAC for process coordination.
22-Oct-25	EAO and IAAC	First regular coordination meeting with EAO and IAAC to discuss Project updates.	Discussion focused on Indigenous and local government engagement, timelines for submission of the IPD and EP, and preparations for the public comment period.

4.3 Planned Engagement

Thesis is committed to timely engagement with Indigenous nations, federal and provincial government agencies, local government, and stakeholders throughout the EA. The project's location in an area far from human settlement results in some inherent constraints to the stakeholder landscape.

Thesis expects to engage with government agencies at identified milestone engagement opportunities and through individual meetings or communications as required.

5.0 Public and Other Potentially Affected Stakeholders

Thesis is committed to timely engagement with identified stakeholders and the public.

5.1 Identified Stakeholders and the Public

The Project is located in a geographic region that has limited interface with municipal communities. It is approximately 10 hours, by road, from the nearest major service centre. Thesis will identify members of the public (i.e., members of potentially affected municipal communities, including landowners and land rights holders) or other stakeholders, including groups or parties that may use the area for:

- Commercial, industrial, or agricultural purposes
- Recreational purposes
- Hunting, trapping, and fishing
- Other economic activities.

During initial engagement with representatives of the District of Mackenzie and the Town of Smithers, Thesis heard interest in economic development in the region. As engagement with the public and broader stakeholders has been more limited to date, no further issues have been raised. Issues raised by the Project are addressed consistent with the Engagement Principles outlined in Section 2.2 of this EP.

To date, public engagement has not taken place. Public engagement is an integral part of the EA process and will commence as part of Early Engagement, in accordance with the requirements of the EA process. See Table 5-1 for the preliminary list of public groups with whom Thesis will engage for the Project. Thesis plans to engage with stakeholders and the public during the EAO's Public Comment Period during the Early Engagement Phase. Feedback on Thesis' engagement approach was not noted during initial consultation with local governments.

Table 5-1: List of Public and Stakeholders Identified for Engagement

Public or Stakeholder Group	Public or Stakeholder Identified for Engagement
Communities and Associations	Mackenzie Chamber of Commerce
	Smithers District Chamber of Commerce
	Prince George Chamber of Commerce
	Northern Development - North East Regional Advisory Committee, Northern Development Initiative Trust
	Business Council of BC
	Mining Association of BC
	BC Economic Development Association
Education and Training Institutions	University of Northern British Columbia
	Coast Mountain College
	College of New Caledonia

Public or Stakeholder Group	Public or Stakeholder Identified for Engagement
Local Businesses and Industry	Business in Nearby Communities: Mackenzie, Smithers, Prince George
	Industry: BC Hydro AuRico Metals Inc Arctos Anthracite Inc Kutcho Copper Corp. Cirque Operation Corp.
Non-Government Organizations (NGO)	Environmental NGOs
	Social NGOs
Residents	Mackenzie
	Smithers
	Prince George

Thesis has completed a search of the Integrated Land and Resource Registry to prepare a list of tenure and land holders that may be affected by the Project. No landowners, land rights holders, or other commercial, industrial, agricultural and recreational landowners have been identified in the Project area. See Table 5-2 for a preliminary list of range, tenure, and land holders for the Project.

Table 5-2: List of Identified Tenure and Permit Holders

Tenure or Permit Number	Tenure or Permit Holder
Multiple (8)	*Mineral Tenure Act* Tenures held by AuRico Metals Inc.
Multiple (5)	*Mineral Tenure Act* Tenures held by Aurora Minerals Ltd.
Multiple (3)	*Mineral Tenure Act* Tenures held by Cazador Resource Ltd.
Multiple (5)	*Mineral Tenure Act* Tenures held by Zeal Exploration Inc.
1106193, 1106268	*Mineral Tenure Act* Tenures held by Green Battery Minerals Inc.
505471, 1127174	*Mineral Tenure Act* Tenures held by TDG BC Assets Corp.
1125145	*Mineral Tenure Act* Tenure held by Coast Copper Corp.
Multiple (4)	*Mineral Tenure Act* Tenures held by private individuals
701193, 710013	Guide Outfitters Tenures held by Omineca
Multiple (3)	Range Tenures held by private individuals
RAN073851	Range Tenure held by Fox Lake Outfitters Ltd.
RAN076771	Range Tenure held by Claw Mountain Outfitters LLP
972733	Commercial Recreation Crown Tenure
811060	Environment, Conservation & Recreation Crown Tenure
960439	First Nations Crown Tenure
290335, 989321	Utility Crown Tenures
Multiple (3)	Traplines

5.2 Planned Engagement

With the initiation of Early Engagement (following the acceptance of the IPD and EP), there will a minimum 30-day public comment period. The EAO will post the IPD on the Environmental Assessment Office Project Information Centre (EPIC) website and launch the public comment period. During this time, members of the public and other stakeholders will have the opportunity to provide feedback on the IPD and EP, and the EAO will develop responses to public comments. Due to the project's location, in an area far from human settlement, there are inherent constraints and limited opportunity to engagement.

Thesis expects to support EAO-led engagement, including production of presentation materials and advertising for any EAO-led events.

In addition to regulator-led engagement activities, Thesis will:

- Schedule or attend regular virtual or in-person meetings with interested stakeholders to seek feedback as the Project advances, as required;
- Develop a Project website as a resource for Project information; and
- Provide educational materials, including videos, brochures, display boards and engagement summaries, for public distribution, where relevant.

6.0 Engagement Plan Review and Update

Thesis will continue to engage with Indigenous Nations, regulators, and stakeholders regarding the Project throughout the EA process. Local information and knowledge will be collected through engagement with community groups and organizations, local and regional governments, and regulatory comment periods. The information and knowledge received will be incorporated, as relevant and appropriate, into the DPD or other deliverables to be filed with the EAO. Additional updates to the EP will be discussed with EAO, and the EP will be available on EPIC. Engagement methods will remain flexible and practical, and this EP will be updated to reflect new input, activities, and direction as needed. This may include the submission of a revised version of this EP alongside the DPD or other EAO deliverables, as appropriate. Where changes are made, Thesis will notify relevant parties and explain the rationale to maintain transparency and support continued participation.

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Appendix A. EAO Table of Concordance

A.1. Environmental Assessment Office Table of Concordance

Table A-1: Environmental Assessment Office Early Engagement Guide Version 2.0, Appendix 1 – Engagement Plan Guidelines Table of Concordance: Engagement Plan for the Lawyers-Ranch Project

Engagement Plan (EP) Guidelines Page #	EP Guidelines Section Title	Early Engagement Guide V2.0 Appendix 1 EP Information Requirement	EP Section Title	EP Section or Location
20	General Information and Contacts	Project name.	Introduction	Section 1.0
20	General Information and Contacts	Project location within the province.	Introduction	Section 1.0
20	General Information and Contacts	Project industrial sector and type (e.g., open pit metal mine).	Introduction	Section 1.0
20	General Information and Contacts	Proponent name, mailing address, phone numbers, email address and website URL. Include the name and contact info of the primary representative for the EA.	Introduction	Section 1.0
20	Project Overview	Include a brief description of the proposed project (the Engagement Plan may refer to the IPD for a more detailed overview of the proposed project).	Introduction	Section 1.0
20	Project Overview	The proximity of the proposed project to local communities, neighbourhoods, and/or areas used by or of value to Indigenous nations and the public.	Introduction	Section 1.0
20	Project Overview	An outline of engagement that occurred in the development of the Engagement Plan and how any feedback received was considered and addressed.	Introduction	Section 1.0

Engagement Plan (EP) Guidelines Page #	EP Guidelines Section Title	Early Engagement Guide V2.0 Appendix 1 EP Information Requirement	EP Section Title	EP Section or Location
20	Engagement Methods	A list of who the proponent proposes to engage with during Early Engagement, including key contact names for appropriate Indigenous nations, members of the public, municipalities, provincial and federal government agencies, and stakeholders, and a rationale for those selected (where appropriate, personal information may be excluded as confidential - the Engagement Plan will be a public document).	Indigenous Nation-Specific Engagement; Government Agencies; Public and Other Potentially Affected Stakeholders; Identified Stakeholders and the Public	Section 3.4; Section 4; Table 4-2; Section 5.0; Section 5.1; Table 5-1; Table 5-2
20	Engagement Methods	An outline of when and how each party will be engaged with during Early Engagement, including but not limited to, the type and frequency of engagement and any constraints to the engagement.	Planned Indigenous Engagement; Planned Engagement; Planned Engagement	Section 3.6; Section 4.3; Section 5.2
20	Engagement Methods	An identification of any potentially impacted populations that may be underrepresented by the proposed engagement methods and how this will be mitigated or otherwise addressed. Refer to the Human and Community Wellbeing Guidelines and Public Engagement Policy for more information.	Engagement Methods	Section 2.3
20	Engagement Methods	A description of different types of engagement tailored to the project and the area to ensure opportunities for all potentially impacted people (consider language and cultural preferences, minority groups, marginalized populations).	Engagement Methods	Section 2.3

Engagement Plan (EP) Guidelines Page #	EP Guidelines Section Title	Early Engagement Guide V2.0 Appendix 1 EP Information Requirement	EP Section Title	EP Section or Location
21	Engagement Methods	An outline of how information will be communicated in a timely and consistent manner.	Timely Communication and Transparency; Engagement Methods; Planned Indigenous Engagement	Section 2.2.1.2; Section 2.3; Section 3.6
21	Engagement Methods	A description of how input and feedback will be gathered and how it will be considered, including how it will be used in project design and what deliverables will be produced to respond to the feedback received such as the use of tracking tables and other documentation methods.	Engagement Methods; Planned Indigenous Engagement	Section 2.3; Section 3.6; Table 3.9
21	Engagement Methods	An outline of the process for periodic updating of the Engagement Plan, including when and how the document may be updated and the process for communicating any updates made.	Engagement Plan Review and Update	Section 6.0
21	First Nation Engagement	A list of all First Nations whose Consultation Area overlaps with the project area or overlaps with potential direct or indirect effects of the project. Note: do not include maps of territories or consultative areas.	Identified Indigenous Nations	Section 3.2

Engagement Plan (EP) Guidelines Page #	EP Guidelines Section Title	Early Engagement Guide V2.0 Appendix 1 EP Information Requirement	EP Section Title	EP Section or Location
21	First Nation Engagement	For each First Nation identified, an overview of engagement activities that have been carried out, a description or tracking table of issues that have been raised with respect to the proposed project, and an explanation of how those issues have been or will be addressed by the proponent, providing a clear rationale for not addressing any issues raised.	Indigenous Nation-Specific Engagement	Section 3.4
21	First Nation Engagement	A description of how First Nations were engaged in the development of the IPD and Engagement Plan, including: Opportunities provided to adequately review and gain an understanding of information in the draft IPD and Engagement Plan, including, where applicable, specific procedures for contributing information for sections of the draft IPD and Engagement Plan.	Indigenous Nation-Specific Engagement	Section 3.4
21	First Nation Engagement	A list of any relevant agreements (including agreements between First Nations), memorandums of understanding, assessment protocols, treaties or other publicly available information of potentially affected First Nations and how the agreements informed the Engagement Plan.	Indigenous Nation-Specific Engagement	Section 3.4

Engagement Plan (EP) Guidelines Page #	EP Guidelines Section Title	Early Engagement Guide V2.0 Appendix 1 EP Information Requirement	EP Section Title	EP Section or Location
21	First Nation Engagement	A description of how Indigenous knowledge holders will be engaged to ensure Indigenous knowledge is applied appropriately and in alignment with the laws and customs of First Nations. Refer to the Indigenous Knowledge Guide for more information.	Indigenous Engagement Approach	Section 3.1
21	First Nation Engagement	An outline of how participating Indigenous nations will be engaged during the development of the DPD.	Planned Indigenous Engagement	Section 3.6
22	Public and Stakeholder Engagement	To ensure that engagement is focussed and relevant, a list of the groups, populations, or individuals that the proponent will engage with as part of public engagement.	Identified Stakeholders and the Public	Section 5.1
22	Public and Stakeholder Engagement	To help focus engagement, a list of the public's interests in the proposed project, such as concerns, potential benefits, project design improvements, and how the public wish to be engaged in Early Engagement and the EA.	Identified Stakeholders and the Public	Section 5.1
22	Public and Stakeholder Engagement	A description of any engagement already completed with landowners, land rights holders, other commercial, industrial, agricultural, and recreational land users, as well as the public, including key interests or issues identified and how these interests/issues were considered in project design.	Identified Stakeholders and the Public	Section 5.1; Table 5-2

Engagement Plan (EP) Guidelines Page #	EP Guidelines Section Title	Early Engagement Guide V2.0 Appendix 1 EP Information Requirement	EP Section Title	EP Section or Location
22	Public and Stakeholder Engagement	A table identifying the issues that have been raised by those parties with respect to the proposed project, and an explanation of how those issues have been or will be addressed by the proponent.	Identified Stakeholders and the Public	Section 5.1
22	Public and Stakeholder Engagement	A description of how local information and knowledge will be collected and considered in project planning and in the preparation of the DPD.	Regulator-Led Engagement; Planned Indigenous Engagement; Engagement Plan Review and Update	Section 2.4, Table 2-1; Section 3.6; Section 6.0.
23	Engagement with Local Governments and Government Agencies	A list of all appropriate local governments, and provincial and federal government agencies to be engaged with and relevant representatives from each agency.	Government Agencies	Section 4.0
23	Engagement with Local Governments and Government Agencies	A description of any previous engagement with local governments, and provincial and federal government agencies prior to submission of the Engagement Plan, including how the Engagement Plan reflects these engagement discussions.	Local Government; Summary of Engagement Activities with Provincial and Federal Government Agencies to Date	Section 4.1; Section 4.2
23	Engagement with Local Governments and Government Agencies	A list of any municipal or local government plans relevant to the EA.	Local Government	Section 4.1