



## Revisions Log

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Major revisions to the previous (i.e. March 2022) version of this *Stakeholder Grievance Mechanism* are described in the table below.

Section	Description (Major Revisions Only)
Various	Various editorial revisions and updates made throughout. For example, references to 'Sabina Gold & Silver Corp.' have been replaced with 'B2Gold Back River Corp. (B2Gold Nunavut)'.
Various	Various revisions throughout the SGM to incorporate B2Gold Corporate Policies and Standards related to internal and external issues resolution.

# BACK RIVER PROJECT STAKEHOLDER GRIEVANCE MECHANISM

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# 1. Introduction

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This document describes the *Stakeholder Grievance Mechanism* (SGM) that B2Gold Back River Corp. (B2Gold Nunavut or the Company) will employ during the development and operation of the Back River Project (Project). B2Gold Nunavut recognizes the importance of good stakeholder relations and effective grievance resolution and has developed this SGM using available best practice guidance. B2Gold Nunavut is further committed to fostering sustainable development throughout all stages of its activities. We constantly strive to conduct our operations in a manner that balances the social, economic, cultural, and environmental needs of the communities in which we operate. We are likewise committed to the health, safety, and well-being of our workforce and the communities we work alongside. To achieve this commitment B2Gold Nunavut will make zero harm the primary goal in all our places of work, incorporate safety as a core value of our business, and integrate safety considerations into all that we do.

The SGM supports B2Gold Nunavut's commitments related to people, sustainable development, social responsibility, and health and safety, and is a component of its broader Environmental, Social, and Governance (ESG) management and reporting system. The SGM is a living document and will be regularly updated based on management reviews, stakeholder feedback, incident investigations, regulatory changes, or other Project-related changes. As B2Gold Nunavut works to address impacts and enhance benefits identified over time, changes may be made to the SGM to better achieve desired outcomes. B2Gold Nunavut's adaptive management strategy enables the instigation of change where required and the use of new data and best practices as they become available. This includes, for example, data and analysis generated by B2Gold Nunavut's monitoring program throughout the life of the Project.

The SGM is intended to be accessible to both internal (i.e. Project employees and workers) and external audiences and will be communicated to local communities, employees, and contractors in a format and language that is readily understandable. Key stakeholders may be consulted on the initial design of the SGM, and any major subsequent changes to it, in order to ensure it remains effective in practice. The SGM will be advertised by B2Gold Nunavut to key stakeholder groups through various engagement methods and be available in hard copy at the office complexes at both the Marine Laydown Area (MLA) and Goose Site Camp.

## 2. Purpose and Scope

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The purpose of this document is to describe how B2Gold Nunavut will address Project employee and stakeholder grievances for the Project. The SGM will serve as a tool to strengthen Project employee and stakeholder trust and support for the Project, as well as help to identify actual and potential impacts B2Gold Nunavut needs to address through corrective actions. Avoiding (or mitigating) the escalation of potential stakeholder conflicts and concerns is another aim of the SGM; B2Gold Nunavut will work towards achieving mutually agreeable resolutions with stakeholders where possible, including through informal processes. Likewise, the SGM is intended to reduce operational risks associated with internal and external stakeholder conflict and grievances.

The temporal extent of the SGM will be the life of the Project itself, including construction, operation, reclamation and closure, and temporary closure/care and maintenance phases. The SGM applies to a wide range of Project-related issues, including (but not limited to):

- Human Resources (e.g. human resources policy application, employee relations, employee, worker or contractor issues and conduct, or other site- or corporate-level activities)
- Human Environment (e.g. land use and harvesting, community health and well-being, benefits implementation, archaeology, stakeholder engagement, related Project activities)
- Terrestrial Environment (e.g. wildlife, vegetation, environmental health, related Project activities)
- Marine and Freshwater Environment (e.g. fish and wildlife, water quality, environmental health, related Project activities)
- Atmospheric Environment (e.g. dust and air quality, noise and vibration, environmental health, related Project activities)

Not all stakeholder issues necessarily constitute a grievance. Additional details on what constitutes a grievance vs. a non-grievance are provided in Sections 3.1 and 6.2. Many non-grievances raised by stakeholders will be addressed directly through B2Gold Nunavut's community engagement program. Many non-grievances submitted by Project employees will be addressed directly by the Human Resources department. General comments, questions, and suggestions on the Project can be raised through public and stakeholder meetings and events, public comment forms, B2Gold Nunavut offices in the Kitikmeot Region, Inuit employee surveys, or other methods.

Furthermore, the SGM does not apply to any disputes related to implementation of the Back River Project Inuit Impact and Benefit Agreement (IIBA) or the execution of Project-related contracts for services. Separate dispute resolution procedures have been developed to address these matters. The SGM is also distinct from B2Gold's Whistleblower Policy, which addresses complaints regarding accounting, internal accounting controls or auditing matters, and establishes a confidential, anonymous submission procedure for employees who have concerns regarding questionable accounting or auditing matters. Further details on B2Gold's Whistleblower Policy can be found here: [https://www.b2gold.com/\\_resources/corporate\\_governance/Policies/Whistleblower-Policy-20230104.pdf](https://www.b2gold.com/_resources/corporate_governance/Policies/Whistleblower-Policy-20230104.pdf)

The SGM contains processes and timelines that are separate and distinct for grievances submitted by employees and contractors versus those submitted by external stakeholders. Please refer to Section 6 of this document for a description of the processes and timelines related to these.

## 3. Applicable Definitions, Policies / Plans, and Guidance

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### 3.1 DEFINITIONS

There are several definitions relevant to the SGM:

Community – Refers to the Kitikmeot Region communities of Cambridge Bay, Kugluktuk, Bathurst Inlet, Bay Chimo, Gjoa Haven, Taloyoak, and Kugaaruk, in addition to those communities in the Northwest Territories that may be affected by the Project.

Grievance – A statement of dissatisfaction regarding an issue involving an alleged interaction between B2Gold Nunavut and a stakeholder that has risen to a significant degree of concern. Issues are considered grievances if they are formally registered by a stakeholder (i.e. the complainant), if they involve a specific impact or incident that can be verified, and if the stakeholder requires or expects a formal response or remediation (e.g. apology, operational changes, compensation/restitution). If the stakeholder is an employee and the statement of dissatisfaction concerns an employment-related matter it may be addressed through existing human resource mechanisms.

Grievance Mechanism – Formalized process for receiving, investigating, addressing, and closing out complaints or grievances from affected stakeholders in a timely, fair, and consistent manner.

Stakeholder – Any individual who may be influenced by or can influence B2Gold Nunavut's activities. Key Project stakeholders considered in the SGM include (but are not limited to) community members, community and Indigenous organizations, land users and harvesters, employees, workers, and contractors.

### 3.2 POLICIES / PLANS

B2Gold Nunavut has several policies and management plans related to the SGM, including:

Social Responsibility and Human Rights Policy – Describes B2Gold's commitments related to the social and economic dimensions of Project development. Amongst other commitments, we will engage openly and respectfully with stakeholders to understand and respond to their perspectives throughout the mine life.

Community Engagement Plan – The objective of this Plan is to fulfil Project external public engagement commitments and maintain meaningful relationships with communities and the public. It describes applicable legislation and guidelines, roles and responsibilities, management and mitigation measures that will be employed by B2Gold Nunavut, and monitoring and reporting considerations.

Socio-Economic Monitoring Plan – Objectives of this Plan include verifying the accuracy of key predictions made in the Final Environmental Impact Statement (FEIS), gauging the efficacy of mitigation measures, facilitating early identification of any unanticipated effects, and supporting adaptive management. The Plan commits B2Gold Nunavut to monitoring several indicators of Valued Socio-Economic Components (VSECs) assessed in the FEIS, including those related to the SGM.

Other Relevant Management Plans – Volume 10 (Management Plans) of the FEIS contains a series of additional management and monitoring plans for the Project. These plans cover topics related to the

human, terrestrial, freshwater/marine, and atmospheric environments that may be relevant to, or addressed through, the SGM.

Code of Business Conduct and Ethics - Defines the standards and values which B2Gold Corp. expects its personnel to follow in all of their dealings with stakeholders and activities with the Company. This code applies to all personnel of the Company and all of its subsidiaries, affiliates, joint ventures and any other entity controlled by the Company (collectively, the "B2Gold Group"), including every director, officer, employee, consultant, and contractor of the B2Gold Group.

People Management Policy - The Company's People Management Policy is strongly informed by international labour standards, in particularly those conventions, standards, and principles as declared by the United Nations and International Labour Organization. The policy further aligns with and is complementary to our codes of conduct and health, safety, environment, social, and security policies and performance standards.

Diversity Policy - Defines the approach to diversity on board and management positions with respect to the identification, nomination, and appointment of board and management members, as well as the Company's succession plan.

Equitable Diverse & Inclusive Workplaces Policy - The Company respects the rights of employees and wants to create an environment that is free of bias and harassment; that affords employees to be themselves and participate and contribute equally and meaningfully. The Company does so with conviction that equity, diversity, and inclusion enhance the Company as an agile, multi-faceted, and global team that is responsive to the employee experience, while appreciating the inherent culture and traditions of communities. We expect employees to allow their colleagues this same freedom of existence.

Non-Discrimination and Harassment Policy - No form of discrimination or harassment will be acceptable or tolerated and the Company will handle allegations in a prompt and appropriate manner to determine and implement corrective measures.

Supplier Code of Conduct - B2Gold seeks to do business with suppliers that share our commitments. In supplier operations that provide goods or services to B2Gold, we expect suppliers to comply with contractual terms, national laws and regulations, our Policy Statement on the Approach to People Management and Code of Business Conduct and Ethics, and the principles outlined herein. We expect suppliers to be acquainted with and sign off on these principles and raise potential impacts and issues proactively. B2Gold will work with suppliers to address issues in good faith. B2Gold retains the right to require reporting, conduct audits, and consider performance against these principles throughout the duration of contracts. Failing to meet these principles may result in contract termination. Suppliers are expected to cooperate in any investigations, audits, and remediation efforts related to potential impacts or non-compliance.

### 3.3 GUIDANCE

The SGM incorporates best practice guidance developed by leading industry associations, including guidance presented in the following documents:

- International Council of Mining & Metals (ICMM). 2019. *Handling and Resolving Local-Level Concerns and Grievances: Human Rights in the Mining and Metals Sector*. December 2019. ICMM: London, UK.
- IPIECA. 2015. *Community Grievance Mechanisms in the Oil and Gas Industry: A Manual for Implementing Operational-Level Grievance Mechanisms and Designing Corporate Frameworks*. IPIECA: London, UK.
- Mining Association of Canada (MAC). 2015. *Site-Level Grievance and Community Response Mechanisms: A Practical Design and Implementation Guide for the Resource Development Industry*. November 2015. MAC: Ottawa, Canada.

Principles, procedures, and information from these guidance documents may be included throughout the SGM.

Furthermore, this Project-specific procedure follows the principles and tenants of B2Gold Corp.'s *Grievance Procedure* and *Procedure for Management of Community Feedback*. In the event of any discrepancies between this SGM and the corporate policy and procedures, or if additional guidance on grievance resolution is needed, the corporate policy and procedures should be considered preeminent.

## 4. Roles and Responsibilities

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The General Manager, Goose Site will maintain overall responsibility for the SGM. Day-to-day implementation of the SGM, as well as on-going performance evaluations, updates or revisions to the SGM, will be the responsibility of the Director, Indigenous & Northern Affairs or another designated management personnel with requisite skill set and experience. The Director, Indigenous & Northern Affairs will also be responsible for keeping the General Manager regularly updated on grievances that are submitted. Aspects of the SGM may also be delegated to other members of the B2Gold Nunavut Project leadership team, depending on the nature of the grievance being addressed.

Furthermore, B2Gold Nunavut will maintain one or more office locations in the Kitikmeot Region, where community members can obtain Project-related information and grievance submission materials. All staff involved in direct implementation of the SGM will receive appropriate orientation/direction to support their work. All members of the B2Gold Nunavut management team will also be made sufficiently familiar with the SGM to help ensure its successful implementation.

B2Gold Nunavut is committed to regular engagement with Project stakeholders and seeking feedback on potential areas for improvement in the SGM over the life of the Project. In this regard, the role of these stakeholders is important to support continual improvement and adaptive management.

## 5. Best Practice Principles

Best practice principles for grievance mechanisms have been described in the literature (e.g. ICMM 2019, IPIECA 2015, MAC 2015). Key principles and how these have been incorporated into the SGM are described in Table 5.1. Specific details on B2Gold Nunavut’s grievance process can be found in Section 6.

Table 5.1: Incorporation of Best Practice Principles into the SGM

Principles	B2Gold Nunavut’s Incorporation of These Principles into the SGM
Openness and Transparency	<ul style="list-style-type: none"> <li>• SGM will be made publicly available through various forums</li> <li>• Communication with/involvement of complainants at key stages of the grievance process</li> <li>• Communication of potential grievance escalation measures with complainants</li> <li>• Monitoring and public reporting of SGM indicators</li> </ul>
Legitimacy	<ul style="list-style-type: none"> <li>• Incorporation of international best practices</li> <li>• Strong organizational support for the SGM and commitment to provide necessary human and financial resources for its implementation</li> <li>• Internal accountability measures established for the SGM</li> <li>• SGM to be modified over time as stakeholder and internal input is incorporated</li> <li>• Independent processes can be pursued for complex issues that cannot be resolved solely by B2Gold Nunavut</li> </ul>
Respect and Fairness	<ul style="list-style-type: none"> <li>• All complainants treated with respect and fairness</li> <li>• Grievance process is applied consistently to all complainants</li> <li>• Grievance resolution based on engagement and dialogue with complainants where possible, third parties or independent processes can be used where necessary</li> <li>• No retaliation for complainants filing a grievance</li> </ul>
Accessibility	<ul style="list-style-type: none"> <li>• SGM will be advertised and made publicly available through various forums</li> <li>• Use of clear and understandable language in SGM documents and communications</li> <li>• Key SGM forms will be translated into Inuinnaqtun and Inuktitut</li> <li>• Additional interpretation and translation support provided to complainants where appropriate</li> </ul>
Predictability and Equitability	<ul style="list-style-type: none"> <li>• Established grievance process and timelines</li> <li>• Availability of grievance escalation measures</li> <li>• Flexibility to address complex/novel circumstances</li> <li>• Comprehensive internal systems in place to record, track, and manage information</li> <li>• SGM is open to all stakeholder groups; special accessibility considerations may be made for vulnerable groups</li> <li>• Facilitation of reasonable access to information and support/resources, to help ensure complainants can engage B2Gold Nunavut on an equal basis</li> </ul>
Continuous Improvement	<ul style="list-style-type: none"> <li>• Learning from best practices</li> <li>• Learning from SGM users</li> <li>• Learning through ongoing SGM implementation</li> <li>• Monitoring, reporting, and adaptive management</li> </ul>

## 6. Grievance Process

B2Gold Nunavut’s grievance process contains several stages and timelines, which may differ between grievances submitted by employees and contractors versus external stakeholders, as summarized in Figures 6-1 and 6-2. Detailed descriptions of these stages are contained in the sub-sections that follow.

Figure 6-1: Process Flowchart for Grievances Submitted by Employees & Contract Workers

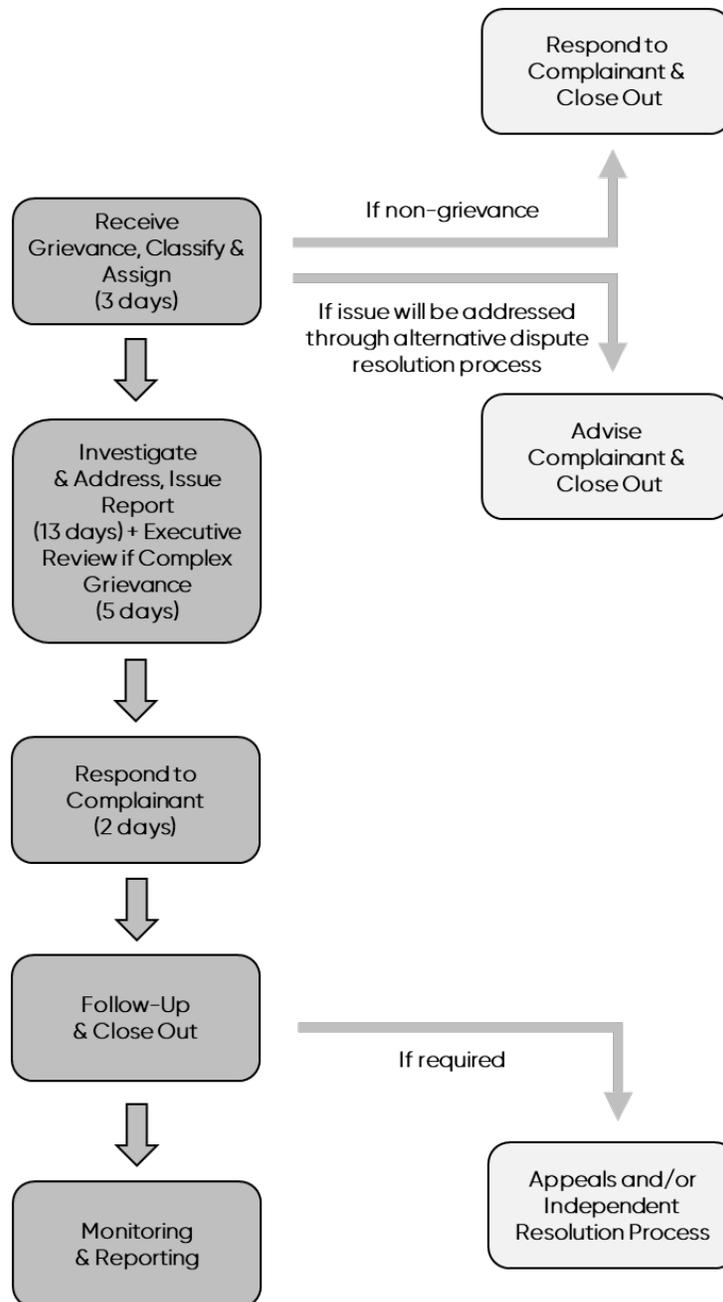
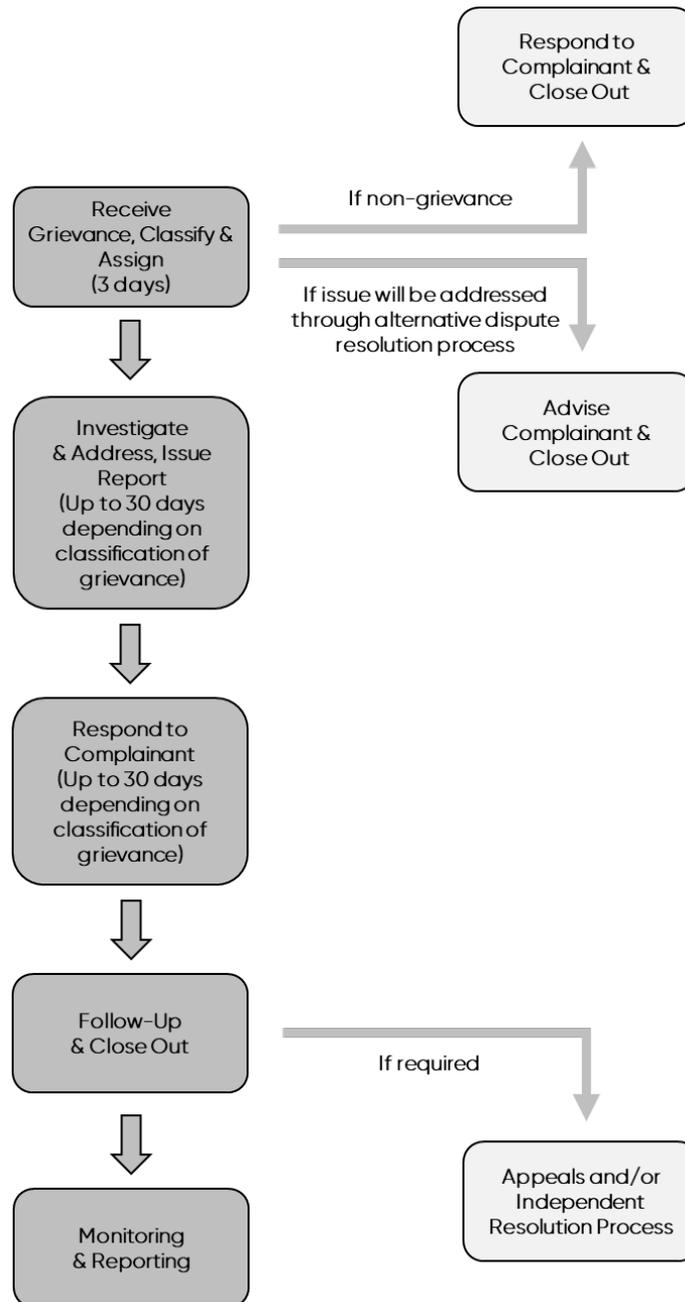


Figure 6-2: Process Flowchart for Grievances Submitted by External Stakeholders



## 6.1 RECEIVE GRIEVANCE, CLASSIFY & ASSIGN

The first stage in the grievance process is for B2Gold Nunavut to receive the grievance from a complainant. However, this requires stakeholders to first be familiar with the SGM and how to access it. B2Gold Nunavut will regularly advertise the SGM to stakeholders through methods which may include:

- Corporate and Project-specific websites
- Kitikmeot Region offices and staff
- Community engagement events and activities
- Newsletters and other informational materials
- Site-based events and activities (including training/orientation)
- Employee communications, such as notices/billboards
- ESG reporting / NIRB Annual Reports
- Management and monitoring plans
- Discussions with the Inuit Environmental Advisory Committee
- Discussions with the Kitikmeot Inuit Association
- Other methods

To ensure accessibility, B2Gold Nunavut offers several ways complainants can submit grievances, as summarized in Table 6.1.

The Human Resources team shall regularly communicate with employees the methods available to employees for the submission of employment-related grievances, issues, or concerns. These types of grievances may not be addressed through the SGM process laid out in this document.

Table 6.1: Grievance Submission Methods

Submission Method	Details
<b>Email</b>	<a href="mailto:BR.Grievance@b2gold.com">BR.Grievance@b2gold.com</a>
<b>Phone</b> *Grievances may be submitted verbally in certain instances	(867) 446-2501 (Cambridge Bay office) (867) 982-2669 (Kugluktuk office) (604) 681-8371 (Vancouver office)
<b>Fax</b>	(604) 681-6209 (Vancouver office)
<b>Mail / In-person</b> *Grievances may be submitted verbally in certain instances	<ul style="list-style-type: none"> <li>• Cambridge Bay office / Supervisor, Community Relations: John Kaiyogana Cambridge Bay, NU Canada X0B 0C0</li> <li>• Kugluktuk office / Senior Coordinator, Indigenous Affairs: Janet Kadlun Kugluktuk, NU Canada X0B 0E0</li> <li>• Edmonton office: Terrace Building #600 – 4445 Calgary Trail Sout Edmonton, AB Canada T6H 5R7</li> <li>• Vancouver office: Park Place # 3400 – 666 Burrard Street Vancouver, BC Canada V7X 1M9</li> <li>• Through B2Gold Nunavut staff participating in local engagement activities</li> <li>• Through site-based managers at the Back River Project</li> </ul>

Complainants will be encouraged to complete a Grievance Submission Form (Appendix A) which includes complainant contact information, details of their alleged grievance, and company actions requested. Copies will be made available in English, Inuinnaqtun, and Inuktitut. Grievances can also be submitted anonymously. However, anonymous grievances may create challenges for the investigation team and it is recognized the effectiveness of the SGM process may be impeded in some instances. Nevertheless, anonymous grievances are to be treated with the same level of care and attention as all other grievances submitted to the Company. Creative strategies may need to be developed to overcome potential challenges.

A Grievance Submission Form can be submitted in writing by the complainant, by an individual on behalf of the complainant, or orally to a B2Gold Nunavut staff person who will document the grievance. For example, not all individuals may be willing or able to complete a Grievance Submission Form themselves (e.g. some individuals may lack literacy skills or prefer to raise issues verbally); in these cases, B2Gold Nunavut staff can complete the form on behalf of individuals if requested. Interpretation/translation support may also be provided if required.

Once a grievance has been received by B2Gold Nunavut, the Grievance Submission Form and any associated materials will be forwarded to the Director, Indigenous & Northern Affairs for initial filing, classification, and assignment. Summary details will also be entered into B2Gold Nunavut's Grievance Database (Appendix B). Correspondence with the complainant will then occur to confirm receipt of

their grievance, provide Company point-of-contact information, and describe next steps in the process.

The Director, Indigenous & Northern Affairs, shall notify the Director, Human Resources & Organizational Development upon receipt of a grievance from an employee. The Director, Indigenous & Northern Affairs shall also notify the employer of a contractor employee upon receipt of a grievance from a contractor employee.

Particularly in the case of a grievance or incident that relates to discrimination or harassment, it is imperative for confidentiality purposes that the fewest number of essential individuals know the identity of the aggrieved. Some communication with the aggrieved is likely necessary to conduct a thorough investigation and, following this process, to ensure that corrective actions have been implemented successfully and that no further action or counseling is required. All grievances related to discrimination or harassment shall be immediately forwarded to the Director, Human Resources & Organizational Development to address.

Once a grievance has been received and logged, the Director, Indigenous & Northern Affairs will undertake (or coordinate) an assessment to classify the grievance and assign internal responsibility for addressing it. Grievances will be classified according to one of the three categories presented in Table 6.2.

**Table 6.2: Grievance Categories**

Category <sup>1</sup>	Description	Key Steps	Process and Anticipated Timelines
<b>Complex Grievance</b>	<ul style="list-style-type: none"> <li>Meets the grievance 'test'</li> <li>Complexity/severity of grievance appears high</li> </ul>	<ul style="list-style-type: none"> <li>Follow Grievance Process Flowchart</li> </ul>	<ul style="list-style-type: none"> <li>More detailed process (i.e. comprehensive investigation)</li> <li>Longer timelines (i.e. 30 day target for resolution, but particularly complex cases could take more time.</li> <li>Requires executive review of investigation findings</li> </ul>
<b>Standard Grievance</b>	<ul style="list-style-type: none"> <li>Meets the grievance 'test'</li> <li>Complexity/severity of grievance appears low</li> </ul>	<ul style="list-style-type: none"> <li>Follow Grievance Process Flowchart</li> </ul>	<ul style="list-style-type: none"> <li>Streamlined process (i.e. simple, focused investigation)</li> <li>Target of 14 days for resolution</li> </ul>
<b>Non-Grievance</b>	<ul style="list-style-type: none"> <li>Does not meet the grievance 'test'</li> </ul>	<ul style="list-style-type: none"> <li>Respond to complainant, address issue directly if possible</li> <li>Close out issue</li> </ul>	<ul style="list-style-type: none"> <li>Streamlined process (i.e. simple, focused assessment)</li> <li>Target of 7 days for resolution</li> </ul>

In order to meet the grievance 'test', a grievance must meet all of the following criteria:

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<sup>1</sup> B2Gold's corporate policies use different terms to categorize grievances. For example, 'Catastrophic' has been replaced with 'Complex Grievance' and 'Major/Moderate' has been replaced with 'Standard Grievance' in this SGM.

- Involve an alleged interaction between B2Gold Nunavut and a stakeholder that has risen to a significant degree of concern
- Be formally registered by a stakeholder (i.e. the complainant)
- Involve a specific impact or incident that can be verified through investigation
- The stakeholder requires or expects a formal response or remediation

If the issue is determined to be a non-grievance or a grievance best addressed through a different mechanism (e.g. human resources) following this test, B2Gold Nunavut will endeavour to address the issue directly with the complainant and provide a timely response. This may be completed as a component of B2Gold Nunavut's community engagement program, as reflected in the *Community Engagement Plan*. Examples of non-grievances might include questions about Project operations, comments about desired benefits, requests for information, suggestions for improved practice, and concerns about minor issues or those already addressed through comprehensive management and mitigation measures.<sup>2</sup> In these instances, B2Gold Nunavut will provide information suitable to address the issue (including directing out of scope complaints to a more appropriate process) but will not commence a grievance investigation. Non-grievance determinations should be conducted expeditiously, to clearly differentiate these issues from grievances that have merit to proceed to a full investigatory process.

The SGM may not apply to employees (including contract employees and workers of contractors) when the issues raised are sufficiently addressed by existing corporate policies or employment contracts. B2Gold Nunavut may choose to utilize a different dispute resolution process at this stage instead. Where this occurs, the complainant should be made aware of any changes to the assessment of their file and the issue will be closed-out within the SGM.

For issues that are determined to be grievances that will be addressed under the SGM, the following list of variables is intended to help determine the relative complexity/severity of the grievance:

- The number and types of individuals affected by the concern or incident
- The areal scale represented by the concern or incident
- Whether there is an identifiable, adverse impact to human rights
- The frequency, duration, and reversibility of the concern or incident
- Whether the issue represents an imminent threat to public health and safety, and/or the environment
- Whether the issue poses a significant risk to the Company
- Whether the concern or incident is potentially illegal or could be subject to another process outside of the SGM

Once a classification has been made, the key steps and process/timeline guidance identified in Table 6.2 should be followed and communicated to the complainant through separate correspondence. At this stage, the Director, Indigenous & Northern Affairs will also consider:

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<sup>2</sup> Some issues and concerns can become formal complaints/grievances in the future if not addressed to the satisfaction of the complainant at early stages. For this reason, efforts must be made to address these issues in a timely and adequate manner.

- Proposed investigation team members, including their roles and responsibilities
- Potential role of executive leadership in investigation and review of findings
- Key issues to be investigated
- Key steps and process elements to be addressed in the investigation, including timelines for completion
- Preliminary corrective actions and/or resolutions to consider
- Anticipated human/financial resources necessary to complete investigation
- Other considerations (e.g. interpretation/translation and other accessibility needs)

For Complex Grievances, upon approval by the Chief Operating Officer of a plan to address the grievance, the Director, Indigenous & Northern Affairs will then notify all investigation team members of their roles and responsibilities for addressing the grievance. Relevant details of the plan are to be summarized in the Grievance Database (Appendix B).

For grievances related to discrimination or harassment, upon approval by the Chief Operating Officer of a plan to address the grievance, the Director, Human Resources & Organizational Development will then notify all investigation team members of their roles and responsibilities for addressing the grievance. Relevant details of the plan are to be shared with the Director, Indigenous & Northern Affairs and summarized in the Grievance Database (Appendix B).

For Standard Grievances, the Director, Indigenous & Northern Affairs, or Director, Human Resources & Organizational Development shall be responsible for the conduct and completion of an investigation and to report on findings as required and determined by the nature of the grievance submitted.

Investigation plans and timelines may vary depending on the context, complexity, and severity of the grievance. For example, more complex issues may require novel responses that do not fully follow established procedures and/or require extended timelines to address. Furthermore, issues of a crisis nature shall be communicated immediately to the Chief Operating Officer and General Manager, Goose Site, so that an appropriate internal response can be developed and timely communication with the complainant and/or other relevant stakeholders can take place.

*Anticipated timelines for completing the 'Receive Grievance, Classify & Assign' stage: See Figures 6-1 and 6-2 and Table 6.2.*

## 6.2 INVESTIGATE & ADDRESS, ISSUE REPORT

As soon as practical upon completion of the previous stage, the grievance investigation should commence. The investigation should aim to objectively determine the root cause(s) of the grievance and any actions that may be required to address it. Typical aspects of an investigation may include collection and examination of relevant information and evidence (e.g. written, verbal, audio, video, computer files, online media); interviews with witnesses, the complainant, aggrieved individuals, and other involved or informed parties; site visits; and/or computer and network forensics. The investigation may also require consultation with managers, human resources staff, legal personnel, and law enforcement.

Depending on how the grievance is categorized (i.e. standard or complex grievance), the investigation and resolution process may be structured using either a streamlined or comprehensive approach (Table 6.3).

Table 6.3: Elements of the Grievance Investigation and Resolution Process

Standard Grievance	Complex Grievance
<b>Streamlined Process</b>	<b>Comprehensive Process</b>
Rapid, focused investigation	Longer, more detailed investigation
Smaller investigative team	Larger investigative team
Company-led	Potential involvement of third parties
Minimal involvement of senior staff	Increased involvement of senior staff
Rudimentary communication with complainant	Increased communication with complainant
Compressed timelines for resolution	Longer timelines for resolution
Simple record-keeping and reporting	More detailed record-keeping and reporting

Once process details have been determined, the investigation will typically aim to verify/uncover the following information:

- Complete description of the grievance
- Who or what was involved
- Where and when the grievance took place
- How and why the grievance occurred
- Whether B2Gold Nunavut was responsible for the grievance (whether fully or in part)
- Corrective actions suggested by the complainant and/or Company officials
- Other relevant details

If B2Gold Nunavut is found to be responsible for the grievance, it may be necessary to implement corrective actions to address it. The development of some corrective actions may require the assistance or approval of B2Gold Nunavut managers who are not part of the immediate investigation team. Example corrective actions could include:

- Changes to operations
- Changes to policy/procedure
- Apologies
- Restitution
- Rehabilitation/remediation
- Compensation (financial or non-financial)
- Progressive discipline (employee)
- Commitments of non-repetition

Corrective actions do not need to be considered when B2Gold Nunavut is not responsible for a grievance. However, investigation results and the reasoning for no corrective actions being taken still need to be explained to the complainant (Section 6.3). In cases where B2Gold Nunavut is partly responsible for a grievance (e.g. is one of several parties sharing responsibility), coordination of efforts

with other parties may be required and/or corrective actions may need to focus only on issues within B2Gold Nunavut's direct control.

Details of the investigation are to be documented in writing and filed in a secure location on B2Gold Nunavut's corporate server. Relevant details should also be summarized in the Grievance Database (Appendix B). For longer and more complex investigations, it may be necessary to provide occasional status updates to the complainant during this stage. All final investigation findings and recommendations for corrective actions must be approved by the Senior Vice President & Chief Operating Officer and General Manager, Goose Site before any additional work is advanced.

*Anticipated timeline for completing the 'Investigate & Address, Issue Report' stage: Acknowledging the unique nature of individual investigations and time required to complete them, B2Gold Nunavut will endeavour to meet the overall process timelines outlined in Figures 6-1 and 6-2 and Table 6.2 when completing this and other stages.*

### 6.3 RESPOND TO COMPLAINANT

B2Gold Nunavut shall maintain contact with the complainant at each stage of the SGM review process and ensure they are routinely updated on the work being done to address and resolve the grievance submitted.

After completing the grievance investigation, B2Gold Nunavut will prepare a response to the complainant. This response should include a summary of the investigation and its findings, any corrective actions or follow-up that B2Gold Nunavut is considering/proposing, and a timeline for their implementation. A formal response should be delivered to the complainant in writing and supplemented with in-person, phone, or other methods of follow-up communication where necessary. Details of this process are to be recorded in the Grievance Database (Appendix B).

B2Gold Nunavut will provide complainants with an opportunity to comment on the response and any corrective actions being proposed. Complainants may also be notified about the existence of potential grievance escalation measures and/or independent processes they may pursue instead. This may include use of an appeals process or legal proceedings, as further outlined in Section 6.4.

*Anticipated timelines for completing the 'Respond to Complainant' stage: See Figures 6-1 and 6-2 and Table 6.2.*

### 6.4 FOLLOW-UP & CLOSE OUT

Once grievances have been addressed, a 'Follow-Up and Close Out' stage of the grievance process will proceed and include:

- Implementation of any grievance resolutions committed to by B2Gold Nunavut, including documentation of relevant corrective actions taken
- Any necessary follow-up or further communication with complainants/other stakeholders
- Finalization and internal filing of all records associated with the grievance
- Official closure of the grievance

Relevant details of this process should be summarized in the Grievance Database (Appendix B). B2Gold Nunavut will ensure only suitable individuals within the Company have access to the grievance database and associated files, and that identities of all complainants and (alleged) offenders remain confidential outside of the grievance team.

Unfortunately, it may not always be possible for B2Gold Nunavut to successfully resolve grievances directly with complainants. Some issues may be too complex for B2Gold Nunavut to address internally; actions desired by complainants may not be feasible or practical for B2Gold Nunavut to implement; claims may be found to be false, unfounded, or unrelated to B2Gold Nunavut; and/or B2Gold Nunavut may be unable to reconcile certain complainant perspectives with their own. Where additional dialogue and other issue resolution processes have failed, it may be necessary for B2Gold Nunavut to close out grievances even when mutually satisfiable resolutions have not been reached.

Where this occurs, the onus will be on B2Gold Nunavut to comprehensively document the steps taken to avoid non-resolution and provide justification for this outcome. The complainant will also be made aware of relevant independent grievance resolution processes available to them outside of B2Gold Nunavut's SGM. Examples may include:

- Nunavut Human Rights Tribunal (<http://www.nhrt.ca/english/home>)
- Nunavut Surface Rights Tribunal (<https://nsrt-nunavut.com/en/about-us>)
- Nunavut Labour Standards Board (<http://www.nu-nlsb.ca/>)
- Workers' Safety and Compensation Commission (<https://www.wscn.nt.ca/>)
- Nunavut Planning Commission (<https://www.nunavut.ca/>), Nunavut Impact Review Board (<https://www.nirb.ca/>), and Nunavut Water Board (<https://www.nwb-oen.ca/>) processes
- Dispute resolution mechanisms included in the IIBA, to be accessed through the Kitikmeot Inuit Association
- Criminal investigations
- Other legal avenues

Grievances that cannot be resolved directly between B2Gold Nunavut and a complainant may need to be directed towards one of the independent processes listed above. However, B2Gold Nunavut will refrain from closing out any grievance that has an independent grievance resolution process initiated by a complainant. Grievances will only be closed out once all independent processes are complete, as new or additional actions for B2Gold Nunavut to address may be identified through them.

In some cases, an appeals process led by B2Gold Nunavut may occur. This will be considered by the Company if requested by the complainant, (alleged) offender, or other relevant parties, but must first be approved by the General Manager, Goose Site or Senior Vice President & Chief Operating Officer before proceeding. An appeals process will be initiated only under select circumstances; for example, if there is reason to believe the initial investigation was flawed or incomplete, if new information relevant to the investigation's findings has become available, or for other reasons that could be material to the outcomes of the investigation. Any internal appeals process that is initiated will include executive leadership in the process.

*Anticipated timeline for completing the 'Follow-Up & Close Out' stage: As required but see Figures 6-1 and 6-2 and Table 6.2.*

## 6.5 MONITORING & REPORTING

The final stage of the grievance process consists of monitoring and reporting. This stage includes both internal and external components.

### Internal Monitoring and Reporting

Internal monitoring and reporting related to the SGM will be conducted by B2Gold Nunavut as required. This will focus on ensuring internal parties are completing the investigations they have been assigned, that process timelines and guidance are being followed, and commitments and resolutions to address grievances are being met. This tracking will occur using the Grievance Database (Appendix B) maintained by the Director, Indigenous & Northern Affairs. A quarterly update on the Grievance Database shall be provided by the Director, Indigenous & Northern Affairs to the Senior Vice President & Chief Operating Officer, and General Manager, Goose Site.

Should issues be uncovered through this tracking process, the Director, Indigenous & Northern Affairs will contact the person(s) responsible and develop an action plan to address outstanding items. Internal reports on the operation of B2Gold Nunavut's SGM may also be prepared for the General Manager, Goose Site or the Senior Vice President & Chief Operating Officer, as required.

More generally, B2Gold Nunavut's community engagement program will be used to help qualitatively assess awareness of, and trust in, the SGM by local communities. Information obtained through this process will be used by B2Gold Nunavut to improve the SGM where appropriate.

### External Monitoring and Reporting

External, or public, monitoring and reporting will help ensure transparency of the SGM while also supporting the objectives of B2Gold Nunavut's broader ESG management and reporting system. Confidentiality of complainants and (alleged) offenders will be maintained in all instances of public reporting and details of grievances will be generalized so as to avoid attribution to specific complainants.

Per B2Gold Nunavut's *Socio-Economic Monitoring Plan*, the following indicators may be monitored and reported on through annual Socio-Economic Monitoring Reports:

- Number of grievances filed, by category (which may include a descriptive summary of grievances filed)
- Number of resolved grievances (which may include a descriptive summary of resolutions)
- Number of outstanding or unresolved grievances (which may include a descriptive summary of outstanding issues)
- Average grievance resolution time
- Number of grievances filed pertaining to non-traditional land and resource use
- Number of grievances filed pertaining to the subsistence economy and land use

Active monitoring and reporting of SGM indicators will contribute to adaptive management of B2Gold Nunavut's operations and the SGM itself.

*Anticipated timeline for completing the 'Monitoring & Reporting' stage: As required, but see Figures 6-1 and 6-2 and Table 6.2.*

## 7. Adaptive Management

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B2Gold Nunavut is committed to the continuous improvement of its operations through adaptive management. Adaptive management related to grievances will focus on two areas: Project performance and SGM performance.

### 7.1 PROJECT PERFORMANCE

B2Gold Nunavut will continue to use adaptive management as a tool for improving the Project's overall ESG performance. Lessons that have been learned through applying the SGM will be used to address past grievances and prevent or mitigate new grievances from occurring in the future. Analysis of grievance trends and root causes can also provide insight into patterns and systemic issues that need to be addressed. Using this information, adjustments to policies, operating procedures, and/or mitigation measures may occur. Project performance concerns can also be raised by Project stakeholders directly to B2Gold Nunavut, or through the NIRB process for consideration (e.g. through comments provided on NIRB annual reports). In this way, Project performance will be adaptively managed in a manner that considers stakeholder feedback.

### 7.2 SGM PERFORMANCE

B2Gold Nunavut will also continue to use adaptive management as a tool for improving the performance of its SGM. Opportunities for stakeholders to comment on the design and effectiveness of this SGM may also occur. For example, key stakeholders may be consulted on the initial design of the SGM, and any major subsequent changes to it, in order to ensure it remains effective in practice. This consultation may occur with:

- Kitikmeot Socio-Economic Monitoring Committee (KSEMC)
- Back River Socio-Economic Monitoring Working Group (SEMWG)
- Inuit Environmental Advisory Committee (IEAC)
- Members of the public, through community engagement presentations and outreach
- NIRB and reviewers of B2Gold Nunavut's Annual Reports to NIRB

Future SGM performance concerns can be raised by Project stakeholders directly to B2Gold Nunavut, or through the NIRB process (e.g. through comments provided on NIRB annual reports). Information obtained through the above actions may lead to future modifications of the SGM, indicators used, and/or grievance resolution methods employed. B2Gold Nunavut's *Community Engagement Plan* provides additional details on how stakeholder feedback is obtained, documented, and responded to by B2Gold Nunavut.

The SGM will be reviewed annually by B2Gold Nunavut for potential improvements. Likewise, the SGM will evolve to reflect emerging best practices and any significant Project changes. Modifications to the SGM may be described in annual reports and revised versions of the SGM will be prepared and distributed to appropriate parties, as necessary. Reports on SGM outcomes and performance, as well as any recommended additional adaptive management actions, will also be prepared for internal Company distribution and use, as required. The SGM will be evaluated against its defined purpose and scope (Section 2). Relevant findings may be shared with NIRB.

## References

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### B2Gold/B2Gold Nunavut Management Plans and Policies:

*Community Engagement Plan* (March 2024 Version)

*Socio-Economic Monitoring Plan* (March 2024 Version)

*Code of Business Conduct and Ethics* (Effective Date: February 23, 2021)

*Diversity Policy (Board and Management)* (Effective Date: November 2, 2021)

*Equitable, Diverse, and Inclusive Workplaces Policy* (Effective Date: January 20, 2020, as amended November 2, 2021)

*Grievance Procedure* (Effective Date: February 23, 2021, as updated December 12, 2021)

*People Management Policy* (Effective Date: November 3, 2017, as amended December 18, 2018 and November 2, 2021)

*Procedure for Management of Community Feedback* (Issued: September 6, 2022)

*Non-Discrimination and Harassment Policy* (Effective Date: February 23, 2021, as amended December 12, 2021)

*Social Responsibility and Human Rights Policy* (Effective Date: July 21, 2020)

*Supplier Code of Conduct* (Implemented: November 13, 2018)

### Other:

International Council of Mining & Metals (ICMM). 2019. *Handling and Resolving Local-Level Concerns and Grievances: Human Rights in the Mining and Metals Sector*. December 2019. ICMM: London, UK.

IPIECA. 2015. *Community Grievance Mechanisms in the Oil and Gas Industry: A Manual for Implementing Operational-Level Grievance Mechanisms and Designing Corporate Frameworks*. IPIECA: London, UK.

Mining Association of Canada (MAC). 2015. *Site-Level Grievance and Community Response Mechanisms: A Practical Design and Implementation Guide for the Resource Development Industry*. November 2015. MAC: Ottawa, Canada.

# Appendix A: Grievance Submission Form

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Thank you for completing this form. You can submit your grievance by email, phone, fax, mail, or in-person. Someone from B2Gold Nunavut will contact you shortly to describe next steps in the grievance process.

Submission Method	Details
<b>Email</b>	<a href="mailto:BR.Grievance@b2gold.com">BR.Grievance@b2gold.com</a>
<b>Phone</b> *Grievances may be submitted verbally in certain instances	(867) 446-2501 (Cambridge Bay office) (867) 982-2669 (Kugluktuk office) (604) 681-8371 (Vancouver office)
<b>Fax</b>	(604) 681-6209 (Vancouver office)
<b>Mail / In-person</b> *Grievances may be submitted verbally in certain instances	<ul style="list-style-type: none"> <li>• Cambridge Bay office / Supervisor, Community Relations: John Kaiyogana Cambridge Bay, NU Canada X0B 0C0</li> <li>• Kugluktuk office / Senior Coordinator, Indigenous Affairs: Janet Kadlun Kugluktuk, NU Canada X0B 0E0</li> <li>• Edmonton office: Terrace Building #600 – 4445 Calgary Trail Sout Edmonton, AB Canada T6H 5R7</li> <li>• Vancouver office: Park Place # 3400 – 666 Burrard Street Vancouver, BC Canada V7X 1M9</li> <li>• Through B2Gold Nunavut staff participating in local engagement activities</li> <li>• Through site-based managers at the Back River Project</li> </ul>

## Appendix B: Grievance Database Template

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Stage	Item	Description
Stage 1: Receive Grievance, Classify & Assign	Grievance Identification No.	
	Date Grievance Received / Submission Method	
	Complainant Contact Information	
	Summary of Grievance / Requested Actions	
	Supporting Files (e.g. Grievance Submission Form, Other Materials)	
	Grievance Category	
	If Non-Grievance, Provide Details of Response to Complainant and Close Out Tasks	
	Investigation Team Members	
	Proposed Timelines for Key Stages of Grievance Process	
	Supporting Files (e.g. Investigation Plan)	
	B2Gold Nunavut Executive Approval of Investigation Plan (e.g. Name, Date)	
Stage 2: Investigate & Address, Issue Report	Correspondence with Complainant (e.g. Date / Method of Follow-Up)	
	Summary of Findings / Proposed Actions	
	Supporting Files (e.g. Investigation Report, Supporting Materials)	
Stage 3: Respond to Complainant	B2Gold Nunavut Executive Approval of Findings / Proposed Actions (e.g. Name, Date)	
	Supporting Files (e.g. Letter, Report to Complainant, Correspondence)	
	Correspondence with Complainant (e.g. Date / Method of Follow-Up)	
Stage 4: Follow-Up & Close Out	Complainant Feedback	
	Server Location(s) of Grievance Files	
Stage 5: Monitoring & Reporting	Other Relevant Information	
	Other Relevant Information	