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BACK RIVER PROJECT
Inuit Human Resources Plan

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Revisions Log

Major revisions to the previous (i.e. March 2022) version of this *Inuit Human Resources Plan* are described in the table below.

Date	Section	Description (Major Revisions Only)
March 2025	Various	<ul style="list-style-type: none"> Plan has been renamed from 'Human Resources Plan' to <i>Inuit Human Resources Plan</i>, to reflect its focus on Inuit personnel. 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)'. Details on Inuit training initiatives and commitments have been consolidated into Section 6.3 (Inuit Training Opportunities). B2Gold Nunavut also envisions developing a new <i>Inuit Training Plan</i> in the future. References to an Inuit Employment and Training Coordinator have been replaced with reference instead to B2Gold Nunavut hiring one or more staff responsible for coordinating various aspects of Inuit employment and training at the Project.
	Section 2	<ul style="list-style-type: none"> Insights from community engagement and information on potential barriers to Inuit employment have been added. References to B2Gold's <i>Local Content Standard</i> have been added.
	Section 4	<ul style="list-style-type: none"> References to the IIBA and B2Gold Nunavut operating policies and practices have been added. Reference to limited recreational fishing opportunities now permitted at the Goose exploration camp added to Section 4.2.5. Reference to new Site Visitor Access Policy added to Section 4.2.5. Revisions made to Section 4.2.7.
	Section 5	<ul style="list-style-type: none"> Responsibilities have been updated

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Date	Section	Description (Major Revisions Only)
	Section 6	<ul style="list-style-type: none"> • 'Targeted Outcomes' and 'Management Actions' sections have been added to Section 6.1. • New 'Ambassador Program' added to Section 6.1. • Additional information on wage practices and new Inuit employee support program at the Project provided in Section 6.1.1.2. • Additional IIBA commitments added to Section 6.2.2. • Section 6.3 has been renamed 'Inuit Training Opportunities' and revised to reflect new details and commitments that have been developed. • A new Workforce Retention Strategy has been added in Section 6.4.
	Section 7	<ul style="list-style-type: none"> • Inuit employment monitoring indicators and Project Certificate Terms and Conditions have been added.


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INUIT HUMAN RESOURCES PLAN

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1. Introduction

This document describes the *Inuit Human Resources Plan* (Plan) B2Gold Back River Corp. (B2Gold Nunavut or the Company) will follow in the development and operation of the Back River Project (Project). This Plan, and other management plans, are intended to describe the ways in which B2Gold Nunavut will address or mitigate issues identified in the Project's Final Environmental Impact Statement (FEIS). This Plan also serves as a means to enhance the delivery of Project-related benefits to local communities and improve corporate social performance over time.

The Plan has been developed in accordance with both internal (i.e. Company) and external (i.e. regulatory and/or third party) requirements. The Plan has been further informed by community input and a review of literature including lessons learned from other northern mining projects. The measures set out in the Plan correlate directly to potential socio-economic effects of the Project identified during the environmental assessment process (See Volume 8, Chapters 3 and 4 of the Project's FEIS) and in the Inuit Impact and Benefit Agreement (IIBA) between B2Gold Nunavut and the Kitikmeot Inuit Association (KIA).

The Plan is a living document and will be regularly updated based on management reviews, community feedback, incident investigations, regulatory changes, or other significant Project-related changes. The Plan will be revisited and updated or adapted as necessary. As B2Gold Nunavut works to address impacts and enhance benefits identified over time, changes may be made to this Plan to better achieve desired outcomes. An adaptive management strategy enables engaged parties to instigate change where required and to employ the use of new data and best practices as they become available; for example, data and analysis generated by B2Gold Nunavut's socio-economic monitoring program. B2Gold Nunavut's senior management and human resources staff will work to implement and update this Plan throughout the life of the Project.

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2. Scope and Objectives

The Project has the potential to enhance the work experience, education/training, and skill levels of the regional workforce. These capabilities also help maximize the retention of workers and contribute to the overall development of human capital (and employability) of workers. Workforce training to achieve these ends will support the development of a workforce capable of meeting Project needs.

The Project has the potential to impact the regional workforce in differing ways. The following potential Project effects and topics of concern to communities addressed by this Plan include:


- Changes to employment levels and income
- Changes to work experience, education, and skill levels
- Changes to family and community dynamics that result from the fly-in/fly-out worker rotation schedule
- Changes to individual and community participation in traditional land-based activities
- Unemployment associated with job loss at Project closure

Community feedback strongly indicates that Inuit employment should be a priority for the Project to address. There is currently a great need and demand for employment in the Kitikmeot Region, but only limited opportunities for Inuit to pursue. Furthermore, employment experience and skills, and educational attainment levels remain low throughout the region, and these have been identified as some key barriers to Inuit fully benefiting from the employment opportunities created by the Project. Additional barriers to Inuit employment in the mining sector can include criminal records, personal and family issues, application process difficulties, challenges with remote work, and others.

B2Gold Nunavut continues to track barriers to Inuit employment and develop appropriate responses.¹ While various community suggestions have been provided to address these matters (and incorporated by B2Gold Nunavut where relevant), experience in Nunavut and elsewhere suggests the path to developing a robust Inuit workforce will take time and require substantial effort on the part of all involved parties. B2Gold Nunavut aims to maximize Inuit employment and retention, and minimize worker turnover over time. Hiring and training will be conducted with consideration for Inuit and gender equity within the available Kitikmeot labour market. Equal opportunities and career advancement potential will be provided to all individuals employed with the Project.

The overarching objective of this Plan is to maximize the employment, income, and education and training benefits available to local communities and Inuit, while mitigating any related potential negative impacts associated with these benefits. B2Gold's *Local Content Standard* (a component of B2Gold's *Social Performance Management System* – see Section 4.2.3 for additional information),

¹ For example, B2Gold Nunavut identifies barriers to Inuit employment in an ongoing manner through its community engagement activities, Inuit Personnel Survey, and stakeholder feedback received on its socio-economic monitoring program. The Company also regularly reviews northern mining industry reports and literature relevant to this topic.

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defines the minimum requirements to support skills and economic development where B2Gold operates through the implementation of local employment and procurement strategies. Employment-specific requirements contained in the *Local Content Standard* will be addressed at the Project by achieving the goals outlined within it, namely:

Plan Local Content Opportunities:

- Understand the local context and how value can be created for the host economy.
- Define the site objectives and risks associated with local content.
- Identify employment and procurement needs in each phase.
- Assess local capacities as well as existing barriers.
- Coordinate internally and engage externally.
- Commit to local content and allocate appropriate human and financial resources.

Implementation of Local Content Strategies:


- Ensure stakeholders have the necessary information to access opportunities.
- Develop systems to support access to opportunities and empower local communities.
- Engage contractors to build in local content requirements.

Monitoring and Reporting on Local Content Strategies:

- Monitor local employment and procurement to identify successes and failures.
- Assess relevance of local content plans.
- Evaluate the effectiveness of local content plans.
- Improve and adjust plans accordingly.


These goals and Project effects are addressed, in significant part, through the mitigation and management elements contained in this Plan (see Section 6 for additional details):

1. Employee Relations Strategy
2. Priority Recruitment Strategy
3. Inuit Training Opportunities
4. Workforce Retention Strategy
5. Workforce Transition Strategy
6. Regional Wealth Creation Initiative

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Other goals of the *Local Content Standard* have been addressed through the Project's FEIS process and documentation, other relevant Project management plans, and existing monitoring and adaptive management processes at the Project.

The Plan applies from the time a Construction decision is made, although it is acknowledged some employment initiatives may not be developed and/or delivered until the Operations phase. The temporal extent of the Plan will be the life of the Project itself, including Construction, Operation, Reclamation and Closure, Post-Closure, and Temporary Closure/ Care and Maintenance phases.

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3. Guidance for Maximizing Inuit Employment Opportunities


An important objective of this Plan is to maximize Inuit employment opportunities at the Project. Members of B2Gold Nunavut's Indigenous & Northern Affairs team have developed guidance for achieving this objective in a culturally appropriate manner. This information is intended to be a reference for B2Gold Nunavut's Human Resources team to use as necessary but is not considered exhaustive. This guidance may be updated and added to in the future.

General Guidance:

- Project staff should be mindful of, and sensitive to, Inuit culture and the Inuit way of life. This can be accomplished, in part, by participating in cultural awareness programming.
- Project staff should be respectful of Inuit values and morals. These are perhaps best reflected in the following eight Inuit Societal Values (Government of Nunavut 2018):
 - *Inuuqatigiitsiarniq* – Respecting others, relationships, and caring for people.
 - *Tunnganarniq* – Fostering good spirits by being open, welcoming, and inclusive.
 - *Pijitsirniq* – Serving and providing for family and/or community.
 - *Aajiiqatigiinni* – Decision making through discussion and consensus.
 - *Pilimmaksarniq/Pijariuqsarniq* – Development of skills through observation, mentoring, practice, and effort.
 - *Piliriqatigiinni/Ikajuqatigiinni* – Working together for a common cause.
 - *Qanuqtuurniq* – Being innovative and resourceful.
 - *Avatittinnik Kamatsiarniq* – Respect and care for the land, animals, and the environment.
- Openness and honesty are important when communicating with Inuit. B2Gold Nunavut should be transparent in all its communications with employees and employment applicants.

Recruitment and Hiring:


- English may not be an employment candidate's first language. This doesn't necessarily lessen their knowledge or abilities.
- Through Inuit cultural practices, Inuit are taught not to boast or brag about themselves. Inuit often have difficulty writing autobiographies, cover letters, or self-assessments as a result.
- Employment candidates may need to fax or physically drop off their resumes/applications, as internet access in some communities and/or for some individuals can be limited.

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- Candidates who do not have access to cell phones or landlines may use social media as a means of direct communication, as it can serve as an alternative to traditional phone-based communication.
- The percentage of individuals who have completed secondary school in the Kitikmeot Region (39%) remains well below the Canadian average (84%).
- In many cases, Inuit gain knowledge from experience rather than formal education.
- Some employment interviews or testing may need to be offered orally instead of in written form.
- Employment interviews should include questions on individual aptitudes, hobbies, and previous employment instead of focusing only on educational attainment and formal skills.
- Human Resources team members participate in B2Gold Nunavut's community engagement tours to become familiar with and knowledgeable about Inuit communities and the people who live there.

Employment, Training, and Retention:

- Be cognizant that Inuit take pride in their work.
- Flexibility in managing Inuit employees is important.
- Harvesting and spending time on the land are important components of Inuit culture and are valued by many Inuit families. Harvesting of traditional food is often done in the spring and fall seasons, and accommodations should be considered for Inuit employees during these periods.
- Inuit often have large and close-knit families, and family life is an exceptionally important part of Inuit culture. Family-related issues and concerns can affect an individual's employment performance.
- Based on previous experience, community member suggestions, and the need to avoid potential adverse outcomes, Inuit employees should be flown directly to/from Project sites if possible (i.e. avoid layovers in Yellowknife and other locations).
- Space should be provided for onsite employees to store and consume traditional food (i.e. country food). Appropriate condiments should also be provided (e.g. China Lily soy sauce).
- As a sign of respect, B2Gold Nunavut should acknowledge and support initiatives related to Nunavut Day (July 9), the National Day for Truth and Reconciliation (September 30), International Inuit Day (November 7), and International Day of the World's Indigenous Peoples (August 9).
- Many Inuit learn best through hands-on interaction, visual demonstrations, and 'learning by doing'. Tacit learning can also occur.

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4. Applicable Legislation and Guidelines

4.1 INUIT IMPACT AND BENEFIT AGREEMENT (IIBA)

B2Gold Nunavut has developed plans and procedures to address Inuit employment that are consistent with the obligations of the Project's IIBA.² More specifically, this *Inuit Human Resources Plan* has been developed to address elements included in Schedule 9.1 ('Employment') of the IIBA. The stated intent of the IIBA in this area is as follows:

- a) B2Gold Nunavut and KIA recognize the Inuit labour supply as a valuable resource in meeting the labour demands of the Project and wish to take steps to maximize Inuit employment at the Project.
- b) B2Gold Nunavut and KIA acknowledge that it is important to recruit and retain Inuit, provide opportunities to advance Inuit to supervisory and management positions and promote long term interest in working at the Project.
- c) B2Gold Nunavut and KIA agree that these provisions will not impose any responsibility on B2Gold Nunavut to assume the role of government or responsibility for social services and infrastructure.
- d) B2Gold Nunavut and KIA acknowledge the role of leadership and mentorship in supporting Inuit progression at Project work sites. The creation of a positive, learning work environment by B2Gold Nunavut and contractor supervisors and managers will support the success of specific Inuit employment measures or formalized training pursuant to this Schedule.


Later sections of this Plan address IIBA elements specific to Inuit employment, employee support, and training, among others.

4.2 B2GOLD NUNAVUT OPERATING POLICIES AND PRACTICES

B2Gold Nunavut has established several internal operating policies and practices that respond to the needs of the Company and those of Kitikmeot residents. These policies and practices typically apply to all Project employees, contractors, and subcontractors both at Project sites and while in transit to Project sites. For example, B2Gold Nunavut maintains policies pertaining to occupational health and safety, travel, non-discrimination and harassment, and social responsibility and human rights. B2Gold Nunavut also develops rules and practices consistent with the requirements of the IIBA between B2Gold Nunavut and the KIA.

More broadly, this Plan is to be read in conjunction with the Company's *Code of Business Conduct and Ethics*, *People Management Policy*, *Diversity Policy*, *Equitable, Diverse and Inclusive Workplaces Policy*, *Non-Discrimination and Harassment Policy*, and *Supplier Code of Conduct*.

² IIBA requirements for mineral development projects in Nunavut are described in more detail in Article 26 of the Nunavut Agreement (NA).

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Specific Company rules and practices that govern employee activities and behaviour at the Project are discussed in greater detail below.

4.2.1 Occupational Health and Safety

B2Gold Nunavut is committed to the protection and promotion of the human health, safety, and welfare of its employees. B2Gold Nunavut's objective is to achieve and maintain zero workplace injuries and occupational illnesses as the Company believes that all injuries and occupational illnesses are preventable. B2Gold Nunavut further believes that health and safety considerations are integral to and compatible with all other management functions in the organization and that effective health and safety management will enhance rather than adversely affect production or costs.

To this end, B2Gold Nunavut's parent company (B2Gold Corp.) maintains both an *Occupational Health and Safety Policy* and *Occupational Health and Safety Performance Standards* which describe the health and safety protocols employees are expected to follow. Relevant aspects of these documents will be communicated to employees based on their positions, roles, and responsibilities at the Project.

All employees have the right to refuse unsafe work and it is B2Gold Nunavut's responsibility to investigate and improve working conditions where necessary. Employees will also be encouraged to join on-site emergency response teams at the Project.

4.2.2 Travel


B2Gold Nunavut is committed to providing Inuit with efficient travel conveyance from Kitikmeot communities directly to the Project site on commencement of their work rotation, and on return to the same community following the completion of their rotation. In this way, B2Gold Nunavut limits potential disruption to Inuit employees and their families, by not requiring protracted travel through other hub locations. In situations where direct travel to and from the Project is not possible, B2Gold Nunavut's travel department endeavours to make commercial accommodation and airfare arrangements that return employees to their home community at the earliest possible opportunity.

4.2.3 Non-Discrimination and Harassment

B2Gold Nunavut is committed to providing and maintaining a safe and supportive work environment where individual rights are protected, and dignity respected. Per B2Gold Corp.'s *Non-Discrimination and Harassment Policy*, the Company has a duty of care towards its employees to (1) guard against exposure to discrimination and harassment, and (2) provide remedies when preventative measures have failed.

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.

Discrimination and harassment are forms of misconduct that undermine the employment relationship and create an intimidating, hostile, or offensive work environment. They impair human rights, debilitate morale, and interfere with work effectiveness. All employees will be treated, and treat each other, in a fair and respectful manner. For further clarity, the following definitions are provided:

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***Discrimination** is any unfair treatment or arbitrary distinction based on a person's protected characteristics including race, gender, gender identity, religion, nationality, ethnic origin, sexual orientation, disability, age, language, social origin, or family or marital status. Discrimination may be an isolated event affecting one person or may affect a group of similarly situated persons or may manifest itself through harassment or abuse of authority.*

***Harassment** is generally understood as any improper and unwelcome conduct that might reasonably be expected or be perceived to cause offence or humiliation to another person. Harassment may take the form of words, gestures, or actions, which tend to annoy, alarm, abuse, demean, intimidate, belittle, humiliate, or embarrass another, or which create an intimidating, hostile, or offensive work environment. Harassment normally implies a series of incidents. Disagreement on work performance or on other work-related issues is normally not considered harassment.*


***Sexual Harassment** is unwanted and unwelcome conduct of a sexual nature that interferes with a person's work or job opportunities. It can include sexual advances, requests for sexual favors, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile, or offensive work environment. While typically involving a pattern of behavior, it can take the form of a single incident. A person of any gender / gender identity can be the victim or the offender of sexual harassment.*

Formal complaints must be reported and investigated as set out in the Project's *Stakeholder Grievance Mechanism* (SGM). The Company is further committed to the protection against unauthorized disclosure of personal information regarding the parties involved in any complaint. Information collected and compiled through the investigative process will be protected in accordance with confidentiality policies and all privacy regulations in force.

4.2.4 Social Responsibility and Human Rights

Per B2Gold Corp.'s *Social Responsibility and Human Rights Policy*, the Company will create a positive and sustainable legacy by understanding and managing the social and economic impacts and opportunities resulting from its presence. B2Gold Nunavut will engage openly and respectfully with stakeholders to understand and respond to their perspectives throughout the mine life. This includes for Inuit employment and training-related matters.

B2Gold Nunavut will seek to gain and maintain support for its presence by considering and responding to stakeholder perspectives when creating plans and carrying out activities that will affect them, including this *Inuit Human Resources Plan*. For example, this Plan will continue to be shared for comment with relevant stakeholders including the Nunavut Impact Review Board (NIRB) and members of the Back River Socio-Economic Monitoring Working Group (SEMWG). As noted previously, various components of this Plan have already been informed by community perspectives and feedback shared with the Company.

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More broadly, B2Gold Nunavut will work with community and government stakeholders and support social and economic development, including through community investment, local employment, and local procurement. One important way community benefits from the Project can be delivered is by providing meaningful employment opportunities to Inuit, which this Plan aims to accomplish.

B2Gold Corp. also maintains a *Social Performance Management System* which outlines the Company's expectations and requirements for the delivery of socially responsible performance and the management of social risks across all B2Gold related business activities and departments. There are 10 Performance Standards which derive from B2Gold Corp. policy and are consistent with international best practice. The *Local Content Standard* defines the minimum requirements to support skills and economic development where B2Gold Corp. operates through the implementation of local employment and procurement strategies. Local content strategies will enable B2Gold Corp. to improve access to and the capacity of local people, businesses, and organizations in a fair, transparent, and coordinated manner.


This Plan has been developed to be consistent with B2Gold Corp.'s *Social Responsibility and Human Rights Policy* and *Social Performance Management System* (including the *Local Content Standard*); in the event of any discrepancy, the aforementioned policy and supporting management system documents will take precedence.

4.2.5 Alcohol and Drugs

B2Gold Nunavut has established a No Alcohol and Drug Rule in compliance with Nunavut's *Mine Health and Safety Act (1994)*. Under this rule, alcohol, non-prescription drugs, and other intoxicants are prohibited substances. Community feedback has indicated local residents place high value on measures related to ensuring all Project sites in the region provide a drug and alcohol-free environment. This requirement is not only linked to the safety of workers at the Project, but also to common understanding that some individuals struggle with substance abuse issues.

The call for random drug and alcohol testing by some local residents is a result of experience with past mining projects. However, in light of the Supreme Court of Canada (2013) ruling indicating random alcohol testing is a violation of individual privacy rights, B2Gold Nunavut will commit to the use of security personnel or similar personnel to enforce the zero-tolerance policy by screening and controlling access to the worksite. Pre-deployment, post incident, and probable cause drug and alcohol testing may also be undertaken. As a requirement of employment on site all staff will consent to the search of belongings and luggage, and B2Gold Nunavut conducts searches, inclusive of physical searches and K9 detection, to ensure that no unauthorized drugs or alcohol are transported to site.

Peer monitoring and reporting at the worksite will also be encouraged to ensure safety for all personnel on site. All employees will be made aware that alcohol, non-prescription drugs, and other intoxicants are not permitted at the Project. Adherence to these rules is expected, zero-tolerance will be enforced, and consequences will result for those who do not comply. Accidents and incidents at the Project where alcohol and/or drug use are suspected contributors will result in formal investigations being completed and testing of involved parties. In addition to defined enforcement and compliance measures, B2Gold Nunavut will provide access to addictions counselling through the EFAP, the IEAP,

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and/or relevant local community supports including corresponding government health departments or agencies.

4.2.6 Harvesting and Country Foods

B2Gold Nunavut has developed rules regarding harvesting (i.e. hunting, fishing, trapping, and gathering) by Inuit and non-Inuit employees alike. B2Gold Nunavut will avoid having unnecessary firearms and firearms activity to facilitate the safety of all Project employees and any others present at Project sites. B2Gold Nunavut has established a No Harvesting Rule for all mine employees during the course of their employment and time at the mine site and related camps, with the exception of limited recreational fishing opportunities being made in the immediate vicinity of the Goose exploration camp. Inuit site-based employees will be engaged in a variety of work schedules, the majority based on 12-hour work days, and are expected to return to their home community when not on shift. With the anticipated rotational shift schedule (e.g. three-week on/three-week off), Inuit workers will have considerable time off shift to be able to continue to participate in traditional land use and harvesting activities.


B2Gold Nunavut has adopted a No Harvesting Rule to avoid unnecessary impacts on wildlife and fish populations and vegetation at Project sites. To facilitate this, recreation and other activities will be provided at the camps, which will be well-appointed facilities. This rule will provide assistance in the management of access to land areas which may be in use by local Inuit. This preserves areas near the Project and its camps for current land users while enabling Inuit employees to continue to engage in traditional harvesting activities while not at work.

B2Gold Nunavut recognizes the rights and needs of individuals who are not employed by the Project but may be travelling through the area as part of regular subsistence land use activities. Individuals who are travelling through the area may be supported in their activities (e.g. potentially provided with short-term room and board on request). During any stay, individuals will also be provided with a camp safety induction describing relevant safety information regarding the Project. This safety information is provided so local hunters are aware of Project activities and can adjust their land use activities accordingly. Likewise, a Site Visitor Access Policy has been developed and disseminated to local communities.

Article 5.7.17 of the NA limits the right of Inuit to harvest within one mile (1.6 km) of buildings, structures, or facilities on lands under surface lease, an agreement for sale, or owned in fee simple. In accordance with Article 5.7.17, harvesting will not be permitted within a one-mile radius of the surface lease associated with the Project.

All employees will be asked to report sightings of non-Project individuals in the vicinity of the Project. These individuals will be contacted to make them aware of the risks associated with the use of firearms near the Project, and will be asked to refrain from such use. Use of firearms will be strictly prohibited within the active Project Development Areas.

B2Gold Nunavut will make reasonable efforts to ensure country foods are available to mine employees and will ensure that freezer space is dedicated at Project sites for Inuit employees to store their own country food. Catering and food provision contracts may also include country food provisions where

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feasible. This will serve the dual purpose of providing country foods to Inuit employees and enabling non-Inuit employees to experience an aspect of Inuit culture. Any purchase of country food for use in kitchen facilities shall be from approved by the Canadian Food Inspection Agency (CFIA), as is required for kitchen operations. It is recognized that currently the availability of country foods from a CFIA-approved food processing facility is limited (i.e. Kitikmeot Foods in Cambridge Bay being the only regional supplier). Given this limitation, it may be that the ability to provide country foods on a regular basis to mine employees will be limited. B2Gold Nunavut will explore other options to facilitate the consumption of country foods while at site (e.g. an employee country food storage and cooking facility will be established).

Additionally, per IIBA Schedule 9.1, Section 8, B2Gold Nunavut shall give priority consideration to vacation requests by Inuit employees undertaking traditional pursuits during their leave.

4.2.7 External Communications

Communication between mine employees and their family members will be facilitated by access to phone and internet connections. Appropriate use of technologies, such as internet-based voice or video calls, will be encouraged. This will enable workers to maintain contact with family members on a regular basis while working away from home for extended periods. This measure may address certain aspects of community well-being in that, for Inuit, prolonged separation from family directly affects identity, belonging, and other aspects of the self and family relations. Essentially, maintaining communication within the family unit will enable Inuit mine employees to retain their employment without significantly compromising cultural values related to family and community.


4.2.8 Language

Nunavut's *Official Languages Act* (2008) recognizes three official languages: Inuit language (i.e. Inuktitut, which may include Inuinnaqtun and Inuktitut), English, and French. The Act guarantees the use of any official language in legislative, judicial, and government communications. The *Inuit Language Protection Act* (2008) is territorial legislation that sets out rights for Inuktitut speakers and the duties of various government organizations and officials in ensuring these rights are upheld.

Although the working language at the Project will be English, B2Gold Nunavut is committed to providing culturally appropriate conditions in the workplace and will establish rules and practices that promote the use of Inuinnaqtun and Inuktitut to the extent possible. All primary signs at the mine site and camps will be displayed in English, Inuinnaqtun, and Inuktitut. B2Gold Nunavut will also provide support for employees interested in improving their English, Inuinnaqtun, or Inuktitut skills. B2Gold Nunavut's Second Language Training Program is detailed in a separate document.

In addition, the IIBA notes the following regarding language:

- *Inuit who do not possess knowledge of English, either written or verbal, will be given reasonable opportunities to qualify for jobs where lack of knowledge of English does not compromise the safety of the employee, safety of others, or job performance.*

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- *Inuit employees will not be disciplined or terminated due to their inability to speak English, but may be transferred to a job requiring less knowledge of English or to a training program to suit them to another job provided such job or training is available.*
- *Where necessary, signs, safety, regulations, and job advertisements will be translated and B2Gold Nunavut policies, directives, procedures, instructions, and job descriptions may be written in Inuinnaqtun and Inuktitut.*
- *B2Gold Nunavut will engage Inuit who are bilingual and who can be available to translate to unilingual Inuit where it is appropriate and where safety and job performance will not be compromised.*

4.2.9 Firearms, Smoking, and Gambling

Safety at the Project is promoted by a No Firearms Rule. Although firearms will be kept on site and adequate secure storage will be provided for this purpose, mine employees flown into the mine site will be prohibited from transporting firearms or weapons for any purpose.

B2Gold Nunavut will discourage employees from smoking in mine camps and will prohibit smoking at specific locations. In camps, smoking will be permitted at designated locations only. Gambling is strictly prohibited under the Camp Rules of Living. Well-appointed recreation facilities and other activities will be provided in camps to provide alternatives and help encourage compliance.

4.2.10 Layoff

Should it become necessary to conduct employee layoffs during the Project life, B2Gold Nunavut commits to ensure appropriate lay-off notice periods are in line with relevant legislation including the current Nunavut *Labour Standards Act (1988)*.


4.2.11 Other Matters

B2Gold Nunavut is committed to upholding the Nunavut *Labour Standards Act (1988)* and other relevant legislation. The Company is further committed to the use of only non-child and non-forced labour, per Canadian law, and recognizes workers' rights to form and to join workers' organizations of their choosing without interference and to bargain collectively.

In addition, B2Gold Nunavut has developed employment practices/policies pertaining to:

- Working hours
- Wages, overtime, vacation, and compensation
- Accommodation management
- Other relevant matters, where necessary

These procedures will include details on how such information will be communicated to employees. An *Employee Handbook* which describes these, and other, matters may be developed by B2Gold Nunavut in the future.


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4.3 GOVERNMENT LEGISLATION AND POLICY

The *Labour Standards Act (1988)* regulates employment in Nunavut. Other supporting legislation includes:

- *Mine Health and Safety Act* and Regulations, S.N.W.T. (Nu.; 1994; 2008), c. 25.
- *Safety Act*, R.S.N.W.T. (Nu.; 1988), C. S-1.
- *Workers' Compensation Act* (Consolidation) Snu. (2007), C. 15.
- *Consolidation of Official Languages Act* Snu. (2008), c.10.


B2Gold Nunavut will ensure the rules and practices it develops comply with the requirements of these acts and the IIBA between B2Gold Nunavut and the KIA.

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5. Roles and Responsibilities

Implementation of the Plan, as well as on-going performance evaluations, updates, or revisions to it, will be the responsibility of the Manager, Human Resources. The Manager, Human Resources may also delegate responsibility for specific components of the Plan to other personnel. For example, B2Gold Nunavut will hire one or more staff responsible for coordinating various aspects of Inuit employment and training at the Project. This staff will have direct responsibility for provisions of the Plan associated with Inuit recruitment or workforce training. Other supporting roles and responsibilities of staff will be identified during implementation based on needs.

B2Gold Nunavut is committed to regular stakeholder engagement and seeking feedback on potential areas for improvement in the Plan over the life of the Project. In this regard, relevant organizations, community stakeholders, and the public are important to supporting continual improvement and adaptive management.

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6. Mitigation and Management

Inuit human resource initiatives at the Project will be delivered through six overarching mitigation and management elements, elaborated on in the sections below:

1. Employee Relations Strategy
2. Priority Recruitment Strategy
3. Inuit Training Opportunities
4. Workforce Retention Strategy
5. Workforce Transition Strategy
6. Regional Wealth Creation Initiative

6.1 EMPLOYEE RELATIONS STRATEGY

The Employee Relations Strategy aims to reduce labour force entry barriers, create a supportive Project environment for employees, and improve employee retention. To this end, the strategy details several management actions that will be undertaken by B2Gold Nunavut at the Project to help achieve these aims.

6.1.1 Targeted Outcomes


The Employee Relations Strategy focuses on areas to enhance local Inuit employment at the Project. Defined targets include:

- Creation of a safe, respectful, and supportive Project employment environment.
- Development of employee relations policies that are commensurate with other northern mining operations and/or common standards employed elsewhere, while also addressing relevant community interests.
- A sustainable significant number of Kitikmeot Inuit become employed and are retained at the Project.

6.1.2 Management Actions

A number of actions or programs may be employed by B2Gold Nunavut to promote good employee relations at the Project, including those pertaining to:

- Skills and entrance requirements
- Employee benefits
- Employee communication
- Work rotation schedules

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- Orientation programs
- Ambassador Program

These are described further below.


6.1.2.1 Skills and Entrance Requirements

B2Gold Nunavut will work with Inuit associations and communities, governments, as well as other groups as appropriate, to assist individuals in decisions about career opportunities with the Project. B2Gold Nunavut continues ongoing discussions with relevant groups regarding prerequisite skills and entry requirements for Project employment. Employment opportunities include anticipated minimum qualifications for entry level positions. These may include completion of grade twelve or evidence of equivalency, ability to pass a criminal records check (leniency for pardons for minor crimes will be considered), and the ability to pass a health screening, including the possibility of a drug and alcohol check (although there will be no pre-testing for cannabis in accordance with the IIBA). In the event that pre-deployment medicals are required to be completed through community health services, B2Gold Nunavut will commit to paying a service fee based on a negotiated fee schedule. B2Gold Nunavut will develop any pre-deployment medical screening program in discussion with the Government of Nunavut's Department of Health if community health services are utilized.

Barriers to employment for Inuit can include a lack of education and skills, a criminal record, and personal and family issues (including time away from family). To help address these issues, the following will be undertaken:

- B2Gold Nunavut will work with regional education providers (e.g. Nunavut Arctic College) to support the provision in Kitikmeot communities of education and training programs that prepare workers for employment. This includes programs ranging from, for example, Adult Basic Education (ABE) to pre-trades and trades related training. In addition, on-the-job training will be made available as it relates to an individual's job requirements and desired career development path, as applicable.
- B2Gold Nunavut will, where appropriate, consider Inuit ability, skills and experience as an equivalent to formal qualifications as identified in job descriptions.
- B2Gold Nunavut may, on a case-by-case basis, establish a process of review for employees that meet all other employment requirements but have a criminal record, to assess whether leniency can be granted. B2Gold Nunavut will also encourage applicants to access the pardon process where relevant.
- B2Gold Nunavut's external communications practices (see Section 4.2.6) aim to provide opportunities for employees to remain in contact with their family members on a regular basis, in turn providing support to employees and increasing employee retention. B2Gold Nunavut is committed to providing assistance in overcoming obstacles to employment.

Per B2Gold's *People Management Policy*, no person under the age of 18 years shall be employed at the Project.

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6.1.2.2 Employee Benefits

Individuals who obtain full time employment with B2Gold Nunavut will be compensated in terms of employment income and benefits.


B2Gold Nunavut does not discriminate in its pay practices between northern and southern employees. No 'wage gap' will exist between Inuit and non-Inuit who work in the same position at the Project, the only exception to this potentially being individuals with historically higher rates of pay who maintain those rates. Wages for positions at the Project are based on industry averages and adjusted to reflect realities of living and working in Nunavut.

B2Gold Nunavut will also offer a complete range of benefits consistent with mine industry standards now in place in Nunavut. All mine employees will receive these benefits, which include for example:

- **Health Care Plan:** Provides coverage for a range of health care services and medications potentially required by the employee and immediate family. Options for extended health care, including vision and dental care, may also be provided. For Inuit employees, the Health Care Plan will coordinate with the Non-Insured Health Benefits (NIHB) Program administered by Indigenous Services Canada.
- **Employee and Family Assistance Program (EFAP):** Provided through Telus Health, counseling services related to financial management, drug and alcohol dependency issues, work related stress, and many other employee issues are freely accessible.
- **Inuit Employee Assistance Program (IEAP):** Provided by the Kitikmeot Friendship Society (KFS), provides culturally appropriate counselling services localized to Kitikmeot communities.
- **Vacation:** Granted in accordance with Nunavut legislation. All employees are required to take vacation annually.
- **Group Tax Free Savings Account (TFSA):** A group pooled voluntary contribution TFSA is available to all indeterminant staff.
- **Group Registered Retirement Savings Plan (RRSP):** A group RRSP is available with a 100% matching contribution from the Employer.

Through the EFAP, all employees will have direct access to counselling and other forms of personal assistance. Inuit employees will also have access to one or more staff responsible for coordinating various aspects of Inuit employment and training at the Project, who will facilitate access to counselling and information resources, such as for substance abuse, financial management, work related stress, employee and family well-being, or employment and career counselling. These services are aimed at maximizing employee retention and providing a positive work experience for all employees. B2Gold Nunavut has committed to ensuring continued availability of the EFAP and staff with Inuit employment and training responsibilities during a temporary layoff period.

In addition, B2Gold Nunavut has worked with a Kitikmeot-based, Inuit-led organization to develop a comprehensive and culturally relevant Inuit Employee Assistance Program (IEAP). Both this program and the EFAP are available for Inuit employees to access.

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The IIBA further commits B2Gold Nunavut to establishing an Inuit employment support system at the Project, which additionally includes:

- Making country food available (also see Section 4.2.5)
- Establishing country food kitchens and cultural activities (also see Section 4.2.5)
- Providing on-site access to communications facilities to allow communications between Inuit employees and their families (also see Section 4.2.6)
- Providing Inuit employees with access to an Inuk representative within the Project with access to B2Gold Nunavut's senior management to discuss and address concerns such as issues about Inuit employee positions, rotation cycles, and career development plans.

B2Gold Nunavut will also facilitate meetings between KIA's IIBA Implementation Manager and the Inuit employees of B2Gold Nunavut and its contractors where necessary.

6.1.2.3 Employee Communication

B2Gold Nunavut's Human Resources Department will be available to receive and address employee concerns, complaints, grievances, or suggestions. B2Gold Nunavut's *Stakeholder Grievance Mechanism* (SGM) also describes how B2Gold Nunavut will address stakeholder grievances for the Project. However, the SGM may not apply to employees (including contract employees and employees of contractors) when the issues raised are sufficiently addressed by existing corporate policies or employment contracts. In these cases, B2Gold Nunavut may choose to utilize a different dispute resolution process instead.


Conflicts and concerns will be addressed promptly and effectively. Complainant confidentiality will also be maintained, with no names or personal identifying factors released beyond the investigative team, unless required by law. Employees will be made aware of relevant grievance/dispute resolution mechanisms during employee orientation. For Inuit employees, communication processes will be complemented by the services of one or more staff responsible for coordinating various aspects of Inuit employment and training at the Project, working within the Human Resources Department.

Relevant terms and conditions of the IIBA, where applicable to Inuit employment and where agreed to with the KIA, will be directly communicated to employees.

6.1.2.4 Work Rotation Schedules

B2Gold Nunavut has structured its work rotation schedules to provide Inuit employees with opportunities to participate in traditional activities from their home communities on their time off. Cambridge Bay, Kugluktuk, Gjoa Haven, Taloyoak, and Kugaaruk are major points of hire; as such, there will be direct flights from these communities to and from the Project for shift changes where possible. B2Gold Nunavut will provide direct airfare from points of hire at no-cost, for all Kitikmeot-based Inuit employees, allowing workers to continue to live in their home communities.

Additionally, B2Gold Nunavut may consider granting leave without pay on a case-by-case basis for Inuit employees requesting additional time off for cultural reasons; for example, to participate in major

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community harvesting activities or important community and cultural events. Vacation requests by Inuit employees undertaking traditional pursuits during their leave period will be given priority.

6.1.2.5 *Orientation Programs*

B2Gold Nunavut will provide orientation programs (in the form of either training or material) to employees that will develop an understanding of what is expected in terms of work responsibilities, environmental protection, and health and safety management. All orientation programs will be provided to employees as part of their employment training and aim to ensure overall safety and well-being at the Project. Orientation programs may include:

- Review of relevant Company policies and procedures
- Work ready program
- Site orientation program
- Non-discrimination and harassment orientation
- Cultural awareness training, which may include additional supervisor/manager focused training
- Financial management/literacy orientation

These initiatives are also described in the Inuit training opportunities included in Section 6.3.

6.1.2.6 *Ambassador Program*

B2Gold Nunavut may develop an employee Ambassador Program to serve as a mentorship or 'buddy' program offered to new hires to help integrate them more effectively into Project operations. If implemented, the purpose of the Program would be to provide orientation, support, and guidance to new employees in a one-on-one environment, and to increase employee retention.

This section has been included as a placeholder for future years. It will be used to describe B2Gold Nunavut's Ambassador Program once finalized.


6.2 **PRIORITY RECRUITMENT STRATEGY**

The intent of the Priority Recruitment Strategy is to maximize the engagement of Kitikmeot Inuit in the Project workforce through hiring initiatives and regular information updates on employment and training opportunities, hiring plans, and Project schedules. This process will utilize both formal targeted communications as well as informal means to provide employment information to local communities.

6.2.1 **Targeted Outcomes**

The Priority Recruitment Strategy focuses on areas to enhance local Inuit employment at the Project. Defined targets include:

- Inuit residing in the Kitikmeot Region are aware of employment and training opportunities at the Project and understand what steps to take to obtain Project employment.

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- A sustainable significant number of Kitikmeot Inuit become employed and are retained at the Project.


6.2.2 Management Actions

A number of methods may be employed to promote the participation and retention of Nunavummiut in Project employment, several of which have been summarized previously. These include:

- Compliance with all IIBA commitments related to priority Inuit employment.
- Cultural awareness policies and/or programming.
- Financial management counseling.
- Substance abuse counseling.
- Means to communicate with family while away at work.
- Work rotation schedules that give consideration to cultural activities.
- Providing and promoting training activities and mentorship programs, and engaging youth through information sessions.
- Communicating early and clearly the employment and training opportunities available.
- Where appropriate, providing assistance to individuals that meet all employment requirements who are barred from employment as a result of their criminal record.
- Provision of country food options, where feasible.

Moreover, B2Gold Nunavut is committed to providing continuing employment opportunities for Inuit and Kitikmeot Region residents. Per the IIBA, priority will be given to hiring employees in the following order: i) Kitikmeot Inuit and other Nunavut Inuit resident in the Kitikmeot Region; ii) all other Kitikmeot and Nunavut Inuit; iii) resident non-Inuit; and iv) all others. Specific objectives for employment are addressed in the IIBA between B2Gold Nunavut and the KIA. The IIBA also contains additional details related to B2Gold Nunavut's Inuit employment commitments; in the event of any discrepancy between this *Inuit Human Resources Plan* and the IIBA, the IIBA will take precedence. Examples of further IIBA commitments designed to create Inuit employment opportunities at the Project include:

- B2Gold Nunavut will regularly undertake labour market analyses to ensure that Inuit employment levels at the Project adequately reflect the available Inuit workforce within the region.
- B2Gold Nunavut will consult with the IIBA Implementation Committee to identify recruitment strategies that will maximize Inuit employment at the Project.
- The IIBA Implementation Committee shall set Annual Inuit Employment Targets that are achievable by B2Gold Nunavut using commercially reasonable efforts for Inuit at the Project.
- B2Gold Nunavut will use commercially reasonable efforts in good faith to meet or exceed Annual Inuit Employment Targets.

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- B2Gold Nunavut will review its recruitment and hiring procedures annually and adjust them as commercially reasonable and in good faith to maximise Inuit employment at the Project and to meet established Annual Inuit Employment Targets.
- B2Gold Nunavut will require a contractual term that contractors and subcontractors develop and apply their own relevant Inuit employment, hiring, retention, and advancement practices.

Given the Project workforce requirements, workers will be hired from various areas of Canada with specific focus on communities throughout the Kitikmeot Region. Northern workers will work a rotational shift with schedule varying by role (i.e. 3 weeks on / 3 weeks off, 4 weeks on / 2 weeks off, etc.). The southern workforce will be directed through Edmonton or Yellowknife.

Awareness of Project opportunities will be enhanced by providing public presentations within local communities, which may include participating in local job fairs and community feasts to further establish positive relationships with communities and to provide advanced notification of employment opportunities and expectations. Through these events and coordination with local education and training facilities, B2Gold Nunavut will provide early and clear public communications of hiring schedules and skill/certification requirements for positions.


B2Gold Nunavut will host a community information and career awareness session in all Kitikmeot communities at least annually. These will encourage Inuit to attain the skills and educational qualifications necessary to maximize employment opportunities, and provide other information on career opportunities at the Project. B2Gold Nunavut will also ensure that all its hiring needs for the Project are posted in Kitikmeot communities and sent to KIA.

B2Gold Nunavut may develop and maintain employment opportunity information online. A Project website may provide public access to general information about Project-related employment, including the types of jobs that will be available, a description of responsibilities, and the requirements for that type of employment (e.g. education and experience). Additionally, employment opportunity postings including similar information may be provided in Project camp sites, hamlet offices (or other appropriate community locations), and at B2Gold Nunavut offices in the Kitikmeot Region. B2Gold Nunavut will also collaborate with local training organizations and/or educational institutions to provide Project information that will help them offer programs that help prepare workers for Project employment.

Further details on the strategies that will be used to promote Inuit participation in Project employment and contracting opportunities within communities are provided in B2Gold Nunavut's *Community Engagement Plan*.

6.3 INUIT TRAINING OPPORTUNITIES

B2Gold Nunavut's Inuit training opportunities seek to maximize Project benefits including Inuit employment, experience, education, and skill level development. In-house training and career development opportunities will be provided to local Inuit in order to meet the employment demands of the Project. B2Gold Nunavut also intends to support worker training programs through external education and training institutions, if appropriate. B2Gold Nunavut will identify existing barriers to employment for Inuit and will work with appropriate staff, and others, to implement measures that

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reduce these barriers. As the Project advances, elements of these Inuit training opportunities are anticipated to eventually be transitioned into a stand-alone *Inuit Training Plan*.

6.3.1 Targeted Outcomes


The Project has the potential to enhance the work experience, education/training, and skill levels of the regional workforce. These capabilities also help maximize the retention of workers and contribute to the overall development of human capital (and employability) of workers. Workforce training to achieve these ends will support the development of a workforce capable of meeting Project needs. Defined targets include:

- Inuit Project employees and other Inuit residing in the Kitikmeot Region are aware of the training opportunities at the Project and understand what steps to take to access them.
- Kitikmeot Inuit become employed and are retained at the Project.
- Meaningful career progression at the Project is available for all Inuit employees who meet requirements.

6.3.2 Management Actions

B2Gold Nunavut will take measures to enhance the experience, education, and skill levels of the local workforce by offering some or all of the following:

- Community Programming
 - Kitikmeot Region Junior High and High School Achievement and Awards Program
 - Kitikmeot School Outreach
 - Kitikmeot Inuit Post-Secondary Education Application Fee Program
 - Scholarships
 - Community Outreach
 - Community Donations
 - Other Initiatives
- Workforce Orientation
 - Review of relevant Company policies and procedures
 - Work Ready Program
 - Site Orientation Program
 - Non-Discrimination and Harassment Orientation
 - Cultural awareness training, which may include additional supervisor/manager focused training
 - Financial Management/Literacy Orientation
- Workforce Training – General Initiatives
 - Strategic Partnerships
 - Program and Training Contributions
 - In-House Training
 - Career Development Plans
 - Inuit Employment and Training Staff

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- Community and Employee Feedback
- On Demand Second Language Training
- Project Closure Considerations
- Youth Employment
- Inuit Training Targets
- Training and Education Fund
- Workforce Training – Technical Initiatives
 - Technical Training and Skills Development
 - Apprenticeship Program
 - Supervisor/Management Training

Relevant initiatives will be described in greater detail in B2Gold Nunavut's future *Inuit Training Plan* (separate document). The IIBA also contains details related to B2Gold Nunavut's Inuit training commitments; in the event of any discrepancy between the *Inuit Human Resources Plan* or future *Inuit Training Plan* and the IIBA, the IIBA will take precedence.

6.4 WORKFORCE RETENTION STRATEGY

The Workforce Retention Strategy is aimed specifically at improving Inuit employee retention and reducing absenteeism at the Project, as these have been known concerns at other northern mining projects. This strategy builds on existing Project management actions in this area (e.g. Employee Relations Strategy) while also presenting additional initiatives. To this end, the strategy details several management actions that will be undertaken by B2Gold Nunavut at the Project to achieve these aims.

6.4.1 Targeted Outcomes


The Workforce Retention Strategy focuses on areas to enhance local Inuit employment at the Project, through staff retention and attendance initiatives. Defined targets include:

- Development of employee retention and attendance policies that are commensurate with other northern mining operations and/or common standards employed elsewhere, and which address relevant community interests.
- A sustainable significant number of Kitikmeot Inuit become employed and are retained at the Project.
- Inuit absenteeism and turnover at the Project are minimized.

6.4.2 Management Actions

A number of actions or programs may be employed by B2Gold Nunavut to promote employee retention and attendance at the Project. In addition to previously described programs (e.g. the Inuit employment support system described in Section 6.1.2.2), this also includes:

- An onsite Inuit Coordinator to support Inuit employees & B2Gold Nunavut community offices
- Inuit Personnel Survey

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- Measures directed at Inuit women
- Exit interviews
- Re-hiring
- Monitoring and addressing turnover

These initiatives are described further below.

6.4.2.1 *Onsite Inuit Support Coordinator and B2Gold Nunavut Community Offices*

B2Gold Nunavut will employ an Inuit Support Coordinator at the Project to support Inuit employees in various ways. This may include providing information and/or direction on resolving issues and conflicts encountered through Project employment, career development opportunities, training offerings, relevant policies and programs at the Project, and other matters. Two individuals working on site-based cross-rotations will fill the Inuit Support Coordinator position which will work in tandem with site-based Human Resource Advisors.

In addition, B2Gold Nunavut will continue to maintain one or more office locations in the Kitikmeot Region where Project employees and other community members can obtain Project-related information, apply for employment, and have other issues or questions addressed. These offices will be staffed by one or more members of the Indigenous & Northern Affairs team. Team members will also make semi-regular site visits to meet with Inuit personnel at the Project and discuss issues or suggestions they may have.


These positions, coupled with existing measures, are intended to provide multiple avenues of support to Inuit employees and provide additional outlets through which their issues and concerns may be addressed, or performance issues discussed. Open communication between all parties is anticipated to reduce the potential for employment issues to escalate and for increased turnover or absenteeism to occur.

6.4.2.2 *Inuit Personnel Survey*

B2Gold Nunavut's Inuit Personnel Survey (IPS) is conducted biannually with Inuit personnel at Project sites. The purpose of the IPS is to:

- Collect employment, education, and housing information from Inuit working at the Project, which B2Gold Nunavut has been asked to collect under the Terms and Conditions of its Project Certificate No. 007 issued by NIRB; and
- Collect Inuit perspectives on other important topics including workplace experiences and the effects of Project employment on family and community life.


This information is used for socio-economic monitoring and management of the Project, in addition to providing feedback to B2Gold Nunavut on matters affecting its Inuit workforce. The IPS may track issues relevant to Inuit turnover and absenteeism, including measures of employee satisfaction, and identify concerns and suggestions relevant to these topics.

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6.4.2.3 Measures Directed at Inuit Women

It is well-documented that women remain under-represented in the Canadian mining industry as a whole, including in northern Canada. Female employment disparities are believed to exist in the mining industry for several reasons, including familial responsibilities and the industry's male-dominated workplace culture. This is a widespread issue and is by no means specific to the Back River Project. Regardless, B2Gold Nunavut remains committed to creating meaningful employment opportunities for Inuit women at the Project and has developed, or is in the process of developing, several initiatives in this area which include:

- Establishment of corporate anti-harassment/violence/discrimination policies, ensuring zero tolerance and offender accountability. These are communicated to all Project staff.
- Creation of safe workspaces and living arrangements for Inuit women. This will be accomplished, in part, by hiring appropriate security personnel, making alarm devices available, and ensuring all Project sites are 'dry' (i.e. alcohol and drug free).
- All project workers are required to undergo Inuit cultural awareness training.
- Respect for Inuit Qaujimajatuqangit (IQ) and Inuit Societal Values at the Project. For example, B2Gold Nunavut's *Inuit Human Resources Plan* includes a description of the eight Inuit Societal Values identified by the Government of Nunavut (2018) and notes Project staff should be respectful of them. B2Gold Nunavut's cultural awareness training also reviews this information.
- Inuit cultural initiatives/spaces will be developed and supported on site.
- Inuit women will be involved in the development of relevant policies, programs, and support measures for Inuit women in the workplace.
- The Employee Engagement Committee includes Inuit women, to review employment-related issues and strategies (e.g. health and safety, hiring, retention, training, promotion), and to liaise with Project management on these matters. IQ-related matters may also be considered through this forum, with the assistance of Inuit employees.
- Creation of a grievance resolution process to address Inuit women's issues on site. The process and methods of accessing are communicated to all Inuit staff.
- Ensuring Inuit female employees are made aware of alternative (i.e. third party/non-project) grievance and/or support programs available to them, where appropriate.
- Gender-sensitive protocols for handling violence-related matters including having another woman present when incidents are being reported, ensuring appropriate personal support resources are made available, and following-up with employees who report violence so they are made aware of outcomes. Appropriate staff will be trained to properly handle violence and harassment claims.
- Require relevant Project initiatives to apply a Gender Based Analysis+ (GBA+) lens, where appropriate, to ensure Inuit women's considerations are identified and addressed.
- Identify barriers Inuit women may face when entering employment in Nunavut's mining sector. Measurable goals and Project-specific procedures may be developed to address these barriers.


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- Develop affirmative steps for attracting Inuit female employees into the Project workforce.
- Development of career path planning processes to support retention and advancement of Inuit female employees on-site.
- Develop career mentorship and 'check-in' programs for Inuit female employees with other Inuit/non-Inuit women on-site.
- Consideration for supporting Inuit women's specific training initiatives, where appropriate.
- Establishment of support measures for Inuit women on-site. These may include establishing an Inuit Employee Assistance Program, appropriate medical services, peer support initiatives, and/or culturally relevant counselling options.
- Offer to develop personal safety and support plans for Inuit female employees suffering from domestic or other forms of violence.
- Offer to develop culturally sensitive life skills training to address the specific needs of Inuit women, including financial literacy.
- Consideration of the needs of Inuit women when developing workplace schedules. Respect for family obligations and cultural considerations when addressing vacation/leave requests. For certain community-based roles, flexible work schedules may be considered to better allow Inuit women to balance work-home life.
- Appropriate communication technologies will be made available on-site (e.g. phone, internet, video conferencing) for Inuit women to utilize.
- Establish processes for training and hiring more women in human resources, supervisory, and management roles.
- The Project's socio-economic monitoring program tracks several issues relevant to Inuit female employment over time (e.g. employment levels, promotions, turnover).
- The workplace experience of Inuit women is regularly tracked and reported on through anonymous Inuit Personnel Surveys.
- A community donations program has been established focused on supporting initiatives pertaining to 'education and training' and 'community wellness and traditional lifestyles' in the Kitikmeot Region, with an emphasis on women and youth.
- Establishment of a 'Women in Exploration' scholarship, which is a \$5,000 scholarship provided to a female student enrolled in a geology program who has successfully completed their first year of studies.

6.4.2.4 Exit Interviews

Exit interviews are offered to all departing Project employees but are voluntary in nature. Such interviews, when conducted, aim to understand:

1. The employee's perception of their salary, benefits, working conditions, opportunities for advancement, etc.;

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2. Reasons why an employee has resigned, including if Company actions (or inactions) contributed to the employee's decision to resign;
3. Actions the Company could potentially take to avoid similar resignations from occurring in the future; and
4. Future plans / employment prospects for the departing employee.

Information obtained from these interviews is provided to relevant staff in B2Gold Nunavut's Human Resources department to address where appropriate. Further, through the Inuit Employee Assistance Program (IEAP) offered through the Kitikmeot Friendship Society (KFS), information about Inuit employees who have resigned is provided and then KFS attempts to contact the employee and reports the results of any information gathered to B2Gold Nunavut in a confidential monthly report. Information obtained from these interviews is provided to relevant staff in B2Gold Nunavut's Human Resources department to address where appropriate.


6.4.2.5 *Re-Hiring*

B2Gold Nunavut may re-engage qualified Inuit employees who have worked on the Project previously, where appropriate. To clearly define the criteria and requirements, including mandatory ineligibility periods for re-hire, an Employee Re-Hire Policy has been developed, key points of which include:

- Employees who leave B2Gold Nunavut after engaging in serious misconduct, including theft, dishonesty, manipulation, insubordination, insolence, or breach of duty, will not be eligible for re-hire.
- Termination for cause from B2Gold Nunavut shall result in a period of a least two (2) years before re-hire eligibility.
- Without cause dismissals because of attendance, behavioural or performance infractions shall result in a period of at least one (1) year before re-hire eligibility.
- A six (6) month period of ineligibility for re-hire will result in instances of job abandonment, quitting without notice, missed flights to and from site, misuse of hotel facilities in company provided accommodations, being denied boarding for a charter or commercial flight due to intoxication or other form of impairment, or not completing a rotation due to not wanting to be at a B2Gold Nunavut project site(s) any longer.
- All re-hire decisions are the discretion of the General Manager and Manager, Human Resources, or their designates.
- Eligibility for re-hire does not amount to a requirement or obligation to rehire. Each re-hire situation is unique and will be assessed on a case-by-case basis.
- Candidates considered for re-hire may be required to seek mental health or other professional supports before being re-hired, or as a condition of re-hire.

6.4.2.6 *Monitoring and Addressing Turnover*

Turnover will be addressed by B2Gold Nunavut in an ongoing manner. For example, B2Gold Nunavut regularly tracks reasons for Inuit turnover and monitors for emerging trends (see Section 7 for

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additional information). B2Gold Nunavut also expects turnover to reduce and stabilize following Construction, as has been evidenced at other northern mining operations. Other notable initiatives B2Gold Nunavut has employed during the Construction phase to address turnover include:

- Working with a Kitikmeot-based, Inuit-led organization to develop a comprehensive and culturally relevant Inuit employee support program.
- The recent addition of the new hard wall camp, with improved accommodations and amenities over the exploration camp, which has improved site conditions and is likely to support a decrease in turnover.
- Career development plans for Inuit employees are also expected to support a decrease in turnover.

B2Gold Nunavut's annual *Socio-Economic Monitoring Reports* submitted to NIRB will contain additional information and updates on this topic.

6.5 WORKFORCE TRANSITION STRATEGY

The Workforce Transition Strategy details the actions B2Gold Nunavut will take to enhance the ability of Project employees to transition to other employment following the completion of Project activities.

6.5.1 Targeted Outcomes


Upon Project decommissioning, loss of employment with the Project may create negative impacts for workers and communities, such as increased levels of unemployment. The intent of the Workforce Transition Strategy is to minimize these adverse effects by easing the transition of Inuit workers to other employment opportunities in the region.

The objective of this strategy is to enhance employees' ability to secure suitable employment elsewhere during the Closure phase of the Project. This strategy focuses on areas likely to enhance employees' ability to secure suitable employment and aims to achieve the following:

- Maximize the transferability of workers' skills and experience
- Provide job search assistance to all workers seeking the service
- Maximize the number of workers that find alternative suitable employment

6.5.2 Management Actions

In order to maximize the transferability of workers' skills and experience, B2Gold Nunavut will develop materials and tools that will enable workers to: 1) identify the skills they acquired and used throughout their employment at the Project by providing relevant listings and descriptions of training and other employment achievements to workers from their personnel records; 2) match skills to alternative

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industries and positions; and 3) articulate and present skills and experience effectively in personal resumes and other job search materials to target those alternative industries and positions.³

To provide assistance with job search capabilities and to maximize the number of Project workers that find alternative suitable employment, B2Gold Nunavut may:

- 1) direct individuals to local listings and regional job opportunities potentially suitable for workers;
- 2) create an inventory, with the voluntary agreement of workers, of available workers and their skills/experience and make this available to external human resources officials;
- 3) support employees' job searching skills by facilitating connection with external job search facilities and assistance;
- 4) offer resume-writing and interviewing skills-building services, as requested; and
- 5) coordinate with appropriate regional training institutions to provide industry-specific retraining information sessions in response to the level of interest by Project workers.

6.6 REGIONAL WEALTH CREATION INITIATIVE


Per the IIBA, the objective of the Regional Wealth Creation (RWC) initiative is to create new long-term jobs in Kitikmeot Region communities outside of mining. These jobs are intended to expand and diversify the Kitikmeot economy and will be funded by B2Gold Nunavut through the IIBA. This commitment has been included in the *Inuit Human Resources Plan* because of its linkages to job creation in the Kitikmeot Region. However, B2Gold Nunavut does not expect to have a role in the management of human resources issues for the RWC projects it invests in.

6.6.1 Targeted Outcomes

B2Gold Nunavut will provide an initial investment of \$4 million to be used to achieve the RWC objective. An Implementation Committee will develop terms of reference to determine eligible projects for funding. These projects must:

- Meet a series of investment objectives
- Be located in Inuit communities in the Kitikmeot Region
- Not have proceeded without B2Gold Nunavut's investment
- Have operational expenses that are reasonably expected to be funded wholly by a third party

³ Though geared primarily towards Permanent Closure of the Project, aspects of the Workforce Transition Strategy will also apply to Temporary Closure, should it occur. For example, the above-noted materials and tools to maximize the transferability of workers' skills and experience will be developed during the Operations phase of the Project and will be available to B2Gold Nunavut Inuit employees who wish to utilize them. Relevant outputs would then be available for use in the event of Temporary Closure.


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- Directly result in the creation of new long-term jobs

6.6.2 Management Actions

A B2Gold Nunavut-KIA Implementation Committee will oversee the RWC initiative, assess outcomes, and make operational adjustments where necessary. Updates on the RWC initiative will be provided in annual reports to both KIA and NIRB.

Furthermore, a RWC Employment Objective has been developed. If Inuit employment at the Project does not meet the objective, B2Gold Nunavut will be required to make additional contributions to the RWC initiative, calculated in accordance with an Employment Model presented in the IIBA.

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7. Monitoring, Reporting, and Plan Effectiveness


B2Gold Nunavut will track and manage selected outcomes of this Plan through its *Socio-Economic Monitoring Plan*. The *Socio-Economic Monitoring Plan* has been developed to help ensure the Project fulfills best practices in social responsibility as it relates to community engagement, capacity building, and realization of benefits from the Project, especially for Inuit. Equally, monitoring will provide relevant and timely information to enable Project managers and community leaders to respond proactively to potential risks and adverse socio-economic effects.

In order to support management measures associated with this Plan, a number of Project-specific indicators have been defined to monitor Plan performance and achievement of management objectives with respect to Inuit employment (see also Table 5.3-1 in the *Socio-Economic Monitoring Plan*).⁴ These include, but are not necessarily limited to:

- Number of Project personnel (by total, origin, gender, and ethnicity) – B2Gold Nunavut data
- Hours worked by Project personnel (by total, origin, gender, and ethnicity) – B2Gold Nunavut data
- Number and percentage of Inuit in each job category – B2Gold Nunavut data
- Median total income of taxfilers with income – Nunavut Bureau of Statistics (NBS) data
- Percentage of population receiving social assistance – NBS data
- Employee promotions (by gender and ethnicity) – B2Gold Nunavut data
- Turnover rate (by gender and ethnicity) – B2Gold Nunavut data
- Reasons for Inuit turnover – B2Gold Nunavut data
- Personnel payroll amounts (by origin and ethnicity where appropriate) – B2Gold Nunavut data

Thresholds may be developed for some socio-economic indicators in the future and may be done in consultation with relevant stakeholders (e.g. SEMWG). Where Project performance is addressed by the IIBA, it is anticipated that applicable thresholds from the IIBA may be used. In other cases, residual effects may be assessed (i.e. using monitoring data) against selected parameters from the FEIS including direction (e.g. positive, negative) and where appropriate, magnitude. In these cases, management actions may be triggered when annual performance is below an applicable threshold/parameter. This may involve an evaluation of the existing mitigation and management measures, and identification of appropriate adjustments. Thresholds may be identified in the *Socio-Economic Monitoring Plan*, if appropriate, in the future.

⁴ Inuit training and procurement indicators have also been developed by B2Gold Nunavut, but are addressed through separate management plans on these topics.

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In addition, other information related to Inuit employment (e.g. stakeholder comments, suggestions, and concerns) will continue to be regularly tracked and documented through B2Gold Nunavut's community engagement program and IPS. Relevant results may be reported publicly (e.g. NIRB annual reporting, employee notices).

Furthermore, there are several Terms & Conditions in NIRB Project Certificate No. 007 pertaining to Inuit employment that B2Gold Nunavut must report on annually. These include, but are not necessarily limited to:

- No. 71 – To the extent the sharing of such information is consistent with and not limited by any IIBA with the KIA, and in consultation with the GN during preparation, the Proponent should submit detailed staff schedule information, consisting of at least the following items: a. Title of positions required by department and division; b. Quantity of positions available by Project phase and year; c. Transferable skills, both certified and uncertified which may be required for, or gained during, employment within each position; and d. The National Occupational Classification code for each individual position.
- No. 72 – The Proponent is encouraged to identify and register all trades occupations, journeypersons, and apprentices working with the Project, as well as to provide the GN with information regarding the number of registered apprentices and journeypersons from other jurisdictions employed at the Project.
- No. 77 – Provided the collection and sharing of such information is consistent with and not limited by any IIBA with the KIA, the Proponent should provide Project-specific data concerning employee community of residence and number of employees that relocated from the year prior (where available, to and from, for Cambridge Bay, Kugluktuk, Taloyoak, Gjoa Haven, and Kugaaruk). The details of this process will be captured in the terms of reference for the SEMWG.

Reports on Plan outcomes and performance, as well as any recommended additional adaptive management actions, will be prepared for internal Company distribution and use as required. The Plan will be evaluated against the defined scope and objectives (Section 2).

As part of B2Gold Nunavut's *Socio-Economic Monitoring Plan*, relevant findings will be reviewed in collaboration with the Kitikmeot Socio-Economic Monitoring Committee (KSEMC), Back River Socio-Economic Monitoring Working Group (SEMWG), and NIRB. Key findings and recommendations will be incorporated into an Annual Report to NIRB. In addition, annual IIBA Implementation Reports will be submitted directly to KIA.

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8. Summary

The Project aims to provide employment opportunities that will attract, develop, and retain qualified Inuit personnel. The objective of the *Inuit Human Resources Plan* is to maximize the employment, income, and education and training benefits available to local communities and Inuit, while mitigating any related potential adverse effects associated with these benefits. These Project effects are addressed through the following overarching mitigation and management elements: 1) Employee Relations Strategy; 2) Priority Recruitment Strategy; 3) Inuit Training Opportunities; 4) Workforce Retention Strategy; 5) Workforce Transition Strategy; and 6) Regional Wealth Creation Initiative.

The monitoring of Plan outcomes will inform the ongoing management and mitigation of potential socio-economic effects identified in the FEIS and will facilitate best practices in social responsibility as it relates to community and worker engagement, capacity building, and the realization of benefits from the Project. The monitoring program has been established to enable Project managers and community leaders to respond proactively and in a timely manner to any undesirable changes to socio-economic conditions.

B2Gold Nunavut recognizes the Project will present Inuit communities with both substantial opportunities as well as changes to current social and economic conditions. B2Gold Nunavut is committed to implementing reasonable measures to enhance the benefits of the Project for individuals residing in Kitikmeot Region communities. Mitigating existing and potential adverse impacts, and promoting individual, family, and community well-being is a shared responsibility of B2Gold Nunavut, KIA, hamlets, and the Government of Nunavut. Commitments to enhance regional employment and training opportunities, and the provision of community programs and services to enhance community well-being, do not impose responsibility on B2Gold Nunavut to assume the role of government; however, B2Gold Nunavut will cooperate in these efforts. For the benefits of the Project to be fully realized at the local level, communities must be engaged in the implementation of strategies to build capacity to enhance well-being, which contributes to the ability of communities to deal with current and future challenges and to retain benefits beyond the life of the Project.

There is inherently some uncertainty associated with predicting social and economic impacts prior to the implementation of Project activities. B2Gold Nunavut will work to address impacts and enhance benefits as they are identified over time. Adaptive management is a method used in the creation and implementation of this *Inuit Human Resources Plan*, and the monitoring program will enable engaged parties to instigate change where required and to employ the use of new data and best practices as they become available.

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Government Legislation and Policy:


1988. *Labour Standards Act, RSNWT (Nu)*.
1988. *Safety Act, RSNWT (Nu)*. c S-1 vols.
1994. *Mine Health and Safety Act, SNWT*. C 25 vols.
2008. *Consolidation of Official Languages Act*.
2008. *Inuit Language Protection Act*.
2007. *Workers' Compensation Act, Snu*. c.15 vols.
2008. *Mine Health and Safety Regulations, NWT Reg (Nu)*. 125-95 vols.

B2Gold Nunavut Management Plans and Policies:


- Community Engagement Plan* (March 2025 Version)
- Socio-Economic Monitoring Plan* (March 2025 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)
- Non-Discrimination and Harassment Policy* (Effective Date: February 23, 2021, as amended December 12, 2021)
- Occupational Health and Safety Policy* (Effective Date: March 12, 2018)
- Occupational Health and Safety Performance Standards* (Issue Date: June 19, 2018)
- People Management Policy* (Effective Date: November 3, 2017, as amended December 18, 2018 and November 2, 2021)
- Social Responsibility and Human Rights Policy* (Effective Date: July 21, 2020)
- Social Performance Management System* (Issue Date: March 18, 2021)
- Supplier Code of Conduct* (Implemented: November 13, 2018)

Other:

- Government of Nunavut. 2018. *Turaaqtavut*.
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Authorized for use on the 1 day of the month of March in the year 2025.