

	<p> ርዕሰ ልማት ለ, ለሙሉ ማረጋገጫ ለሙሉ ማረጋገጫ ለሙሉ ማረጋገጫ, ለሙሉ ማረጋገጫ ለሙሉ ማረጋገጫ ለሙሉ ማረጋገጫ ለሙሉ ማረጋገጫ ለሙሉ ማረጋገጫ ለሙሉ ማረጋገጫ ለሙሉ ማረጋገጫ ለሙሉ ማረጋገጫ ለሙሉ ማረጋገጫ ለሙሉ ማረጋገጫ </p>
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BDO Canada LLP

አዲስ አበባ, ለሙሉ ማረጋገጫ ለሙሉ ማረጋገጫ ለሙሉ ማረጋገጫ ለሙሉ ማረጋገጫ
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ጋረጋጅ ል - ወላደርባህሪቶ ህጋዊጋጠጥ

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Baffinland Iron Mines Corporation

Agreed-Upon Procedures on the
Commitments Audit Protocol report to the
Nunavut Impact Review Board

For the period ending December 31, 2024



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Agreed-Upon Procedures Report

To: Baffinland Iron Mines Corporation

Purpose of this Agreed-Upon Procedures Report

Our report is solely for the purpose of assisting Baffinland Iron Mines Corporation (the "Entity") in meeting its reporting requirements and may not be suitable for another purpose.

Management's Responsibilities

Management has acknowledged that the agreed-upon procedures are appropriate for the purpose of the engagement. Management is responsible for the subject matter on which the agreed-upon procedures are performed.

Practitioner's Responsibilities

We have conducted the agreed-upon procedures engagement in accordance with the Canadian Standard on Related Services (CSRS) 4400, *Agreed-Upon Procedures Engagements*. An agreed-upon procedures engagement involves our performing the procedures that have been agreed with the Entity, and reporting the findings, which are the factual results of the agreed-upon procedures performed. We make no representation regarding the appropriateness of the agreed-upon procedures.

This agreed-upon procedures engagement is not an assurance engagement. Accordingly, we do not express an opinion or an assurance conclusion.

Had we performed additional procedures, other matters might have come to our attention that would have been reported.

Professional Ethics

We have complied with the relevant ethical and independence requirements set out in rules of professional conduct / code of ethics in Canada.

Procedures and Findings

We have performed the procedures described below on the Commitments Audit Protocol report for the period ending December 31, 2024, which were agreed upon with the Entity.

Procedures	Findings
1. Obtain the Commitments Audit Protocol report from Baffinland Iron Mines Corporation.	We obtained the Commitments Audit Protocol report from Baffinland Iron Mines Corporation.
2. Read the Instructions and Introduction tabs on the Commitments Audit Protocol report.	We read the Instructions and Introduction tabs on the Commitments Audit Protocol report.
3. Record the auditor's name and report date of the specified auditing procedures at the top of the Project Certificate (PC) Conditions section and Inuit Impact and Benefit Agreement (IIBA) Commitments section on	We recorded our name and the report date of the specified auditing procedures at the top of the Project Certificate (PC) Conditions section and Inuit Impact and Benefit Agreement (IIBA) Commitments section on the Commitments Audit Protocol report (Appendix B).



<p>the Commitments Audit Protocol report (Appendix B).</p>	
<p>4. For each Audit Question on the PC Conditions section and IIBA Commitments section in the Commitments Audit Protocol report, obtain documented evidence and/or interview personnel from Baffinland.</p>	<p>We read each Audit Question in PC Conditions section and IIBA Commitments section in the Commitments Audit Protocol report, and when applicable, obtain documented evidence and/or interviewed personnel from Baffinland as deemed appropriate.</p>
<p>5. For documented evidence referred to in procedure 4 above, record a file name and/or URL that links to the source of documented evidence, including page number if reasonable.</p>	<p>For documented evidence referred to in procedure 4 above, we provided a file name and/or URL that links to the source of documented evidence, including page number if reasonable. Please see Appendix B, the Commitments Audit Protocol report, for detailed results pertaining to each Audit Question per section.</p>
<p>6. For interviewing personnel referred to in procedure 4 above, record the position of the interviewee and document what was discussed.</p>	<p>For interviewing personnel referred to in procedure 4 above, we recorded the position of the interviewee and documented what was discussed. Please see Appendix B, the Commitments Audit Protocol report, for detailed results pertaining to each Audit Question per section.</p>
<p>7. For each Audit Question referred to in procedure 4 above, record whether there was evidence provided, in the form of documented evidence and/or interview notes, that supported the completion of the audit question. This is to be answered either Yes, No or Non-applicable.</p>	<p>For Audit Questions referred to in procedure 4 above, we recorded whether evidence was provided that supported the completion of the audit question.</p> <p>For Audit Questions deemed to be non-applicable (for example, relating to future phases of the project), we have documented the interviewee and noted what was discussed. We also removed the question from the 'Completion Rate' calculation at the top of the relevant section.</p> <p>We have provided Appendix A - Summary of Results - to detail how many Audit Questions have had evidence provided supporting the completion of the audit question or were non-applicable for each section.</p> <p>Please see Appendix B, the Commitments Audit Protocol report, for detailed results pertaining to each Audit Question per section.</p>

Chartered Professional Accountants, Licensed Public Accountants

Guelph, Ontario
 March 18, 2025

Appendix A - Summary of Results

Audit Section	December 31, 2024 Completion Rate	Details of Completion Rate	June 30, 2024 Completion Rate
Project Certificate (PC) Commitments	100%	89 Total Audit Questions -12 Audit Questions non-applicable <hr/> 77 Audit Questions applicable 77 Audit Questions where evidence was provided 100% Completion Rate	99%
Inuit Impact and Benefit Agreement (IIBA) Commitments	98%	57 Total Audit Questions - 7 Audit Questions non-applicable <hr/> 50 Audit Questions applicable 49 Audit Questions where evidence was provided 98% Completion Rate	98%

Appendix B - Commitments Audit Protocol report

Project Certificate (PC) Conditions

Project Certificate (PC) Conditions

Name of Auditor: BDO Canada LLP

Date of Audit: 30-Jun-24

Completion Rate:	
Total # of audit questions with evidence provided supporting completion of the audit question	77
Percentage of applicable audit questions with evidence provided supporting completion of the audit question	100%

Concern #	PC Condition #	Commitment Statement	Audit Question	Evidence Provided (Yes / No / N/A)	Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Accountable Manager	Responsible Position	Documented Evidence	Interview Notes
1	10	The Proponent shall update its Dust Management and Monitoring Plan to address and/or include the following additional items: 1.a. Outline the specific plans for monitoring dust along the first few kilometers of the rail corridor leaving the Mary River mine site.	Has Baffinland updated its Dust Management and Monitoring Plan to address and/or include the following additional items: 1.a. Does the Plan outline the specific plans for monitoring dust along the first few kilometers of the rail corridor leaving the Mary River Mine site?	Not Applicable	No	No	Completed	Site Enviro	Environmental Superintendent		Interviewed Environmental and Regulatory Compliance Manager (as part of June 2019 report) - Not applicable since rail not yet planned/constructed. Therefore, there is no specific plans for monitoring dust along the rail corridor leaving the Mary River Mine site.
		1.b. Identify the specific adaptive management measures to be considered should monitoring indicate that dust deposition from trains transporting along the rail route is greater than initially predicted.	1.b. Does the Plan identify the specific adaptive management measures to be considered should monitoring indicate that dust deposition from trains transporting along the rail route is greater than initially predicted?	Not Applicable	No	No	Completed	Site Enviro	Environmental Superintendent		Interviewed Environmental and Regulatory Compliance Manager (as part of June 2019 report) - Not applicable since rail not yet planned/constructed.
		1.c. Outline specific plans for monitoring dustfall at intervals along and in the vicinity of the Milne Inlet Tote Road to determine the amount and extent of dustfall.	1.c. Does the Plan outline specific plans for monitoring dustfall at intervals along and in the vicinity of the Milne Inlet Tote Road to determine the amount and extent of dustfall?	Yes	Yes	No	Completed	Site Enviro	Environmental Superintendent	"Terrestrial Environment Mitigation and Monitoring Plan" document, "Vegetation and Monitoring: Dust Fall" section 4.3, appendix B (page 104) (refer to B-22B-1). "2021 Monitoring Overview, June 30 2021 Presentation to the TEWG": Additional dustfall monitoring stations added (pg. 8-11) (Refer to B-22B-34). "2022 Monitoring Overview, June 23 2022 Presentation to the TEWG": Additional dustfall monitoring stations added (pg. 8) (Refer to B-22B-35). "2023 Mary River Project Terrestrial Environment Annual Monitoring Report" document summarizes changes to program components re dust monitoring (pages 49 - 54) (refer to B-24B-13 - 2023 Terrestrial Environment Annual Monitoring Report)	Additional dustfall stations added in 2021 presented to the TEWG in June 2021. Refer to B-22B-34. Sustainability specialist/Manager, Community Resource Services (Sept 2022). Additional dustfall stations added in 2022 presented to the TEWG in June 2022.
		1.d. Identify the specific adaptive management measures to be considered if monitoring indicates that dust deposition from traffic on the Milne Inlet Tote Road is greater than initially predicted.	1.d. Does the Plan identify the specific adaptive management measures to be considered if monitoring indicates that dust deposition from traffic on the Milne Inlet Tote Road is greater than initially predicted?	Yes	No	No	Completed	Site Enviro	Environmental Superintendent	BIM Air Quality and Noise Abatement Management Plan - Section 5.2.1 Table 9 (refer to B-22B-36).	See Table 9 "Dustfall Performance Indicators and Thresholds"
2	21	Measures for dustfall monitoring designed as follows: 2.a. To establish a pre-trucking baseline and collect data during Project operation for comparison	Measures for dustfall monitoring designed as follows: 2.a. Has the AEMP established a pre-trucking baseline and collected data during Project operation for comparison?	Yes	Yes	No	Completed	Site Enviro	Environmental Superintendent	"2021 Annual Report for the NIBR" (Page 158 - 160)(refer to 2.22B-26). "2023 Mary River Project Terrestrial Environment Annual Monitoring Report" document summarizes changes to program components re dust monitoring (pages 49 - 54) (refer to B-24B-13 - 2023 Terrestrial Environment Annual Monitoring Report)	Interviewed Environmental and Regulatory Compliance Manager - Additional data was collected during the 2020 field season. The draft annual report, inclusive of dustfall results was submitted to the members of the Terrestrial Environment Working Group for comment in April 2021 and discussion of results were included as part of the 2020 Annual Report for the Nunavut Impact Review Board in May 2020. The final draft will include comment responses. Sustainability specialist/Manager, Community Resource Services (Sept 2022). Results reported on annually in the NIBR annual report and as part of the Terrestrial Environment Annual Monitoring Report (TEAMR). Final 2021 TEAMR was not released during period of audit. Final Report to be released in Q3 of 2022.
		2.b. To assess the seasonal deposition (rates, quantities) and chemical composition of dust entering aquatic systems along representative distance transects at right angles to the Tote Road and radiating outward from Milne Port and the Mine Site.	2.b. Has the AEMP assessed the seasonal deposition (rates, quantities) and chemical composition of dust entering aquatic systems along representative distance transects at right angles to the Tote Road and radiating outward from Milne Port and the Mine Site?	Yes	Yes	Yes	Completed	Site Enviro	Environmental Superintendent	B-22B-38. "Aquatic Effects Monitoring Plan" document, (Page 9, 58-59) Refer to A-24A-12 2023 NIBR Annual Report Appendix G B.4 Aquatic Effect Monitoring Plan	Aquatic Effects Monitoring Plan updated in NIBR 2023 Annual Report Lake Sedimentation monitoring report updated for 2023
3	45	3. The Proponent shall adhere to the No-Net-Loss principle at all phases of the project to prevent or mitigate direct or indirect fish and fish habitat losses.	3. Has Baffinland developed policies and implemented procedures to ensure it adheres to the "No-Net-Loss" principle?	Yes	No	No	Completed	Site Enviro	Environmental Superintendent	B-24-3. "2023 NIBR Annual Report - Appendix G 2.6 (Tote Road Fish Habitat) - 1 of 8 - As Sent" document, Sections 1-2 (pages 1-4)	
4	47	4. The Proponent shall ensure that all Project infrastructure in watercourses are designed and constructed in such a manner that they do not unduly prevent and limit the movement of water in fish bearing streams and rivers.	4. Has all project infrastructure in watercourses been designed and constructed to not unduly prevent the movement of water in fish bearing streams and rivers?	Yes	No	No	Completed	Site Enviro	Environmental Superintendent	B-24-3. "2023 NIBR Annual Report - Appendix G 2.6 (Tote Road Fish Habitat) - 1 of 8 - As Sent" document, "Section 3.0: Aquatic Monitoring" section (Pages 7-9)	Interviewed Environmental and Regulatory Compliance Manager - Issues noted in the 2020 report will be addressed in 2021. Environmental and Regulatory Compliance Manager (Feb 2023). Project infrastructure is regularly inspected to identify any conditions that may unduly prevent the movement of water in fish bearing streams and rivers. Baffinland works to correct any issues identified, in cooperation with regulatory authorities including Fisheries and Oceans Canada and the Nunavut Water Board.
		5.a. The Proponent shall develop plans to conduct additional surveys for the presence of arctic char in freshwater bodies in relation to the Tote Road.	5.a. Have plans been developed to conduct additional surveys for the presence of Arctic Char in Freshwater bodies in relation to the Tote Road?	Yes	No	No	Completed	Site Enviro	Environmental Superintendent	Technical Memo "Mary River Project: Milne Inlet Tote Road Monitoring: Results of Additional Stream Crossing Monitoring, 2021" (Section 1.0) (refer to B-22B-31).	Interviewed Environmental and Regulatory Compliance Manager (as part of June 2019 report) - Fish surveys undertaken by Baffinland are in general for Arctic Char.

Project Certificate (PC) Conditions

Name of Auditor: BDO Canada LLP

Date of Audit: 30-Jun-24

Completion Rate:	
Total # of audit questions with evidence provided supporting completion of the audit question	77
Percentage of applicable audit questions with evidence provided supporting completion of the audit question	100%

Concern #	PC Condition #	Commitment Statement	Audit Question	Evidence Provided (Yes / No / N/A)	Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Accountable Manager	Responsible Position	Documented Evidence	Interview Notes
5	48(a)	5.b. and ongoing monitoring of arctic char health where applicable, within watersheds proximal to the Tote Road.	5.b. Has a plan been implemented to monitor Arctic Char health, within watersheds proximal to the Tote Road?	Yes	No	No	Completed	Site Enviro	Environmental Superintendent	B-22B-38 "Aquatic Effects Monitoring Plan" document, Section 3.3.6 Fish (Arctic Char) Health (pages 55-58)	Arctic Char health monitoring program implementation to begin in 2022 as described in Aquatic Effects Monitoring Plan
		5.c. The Proponent shall consult with the MHTD regarding the design, timing, and location of proposed surveys and ongoing monitoring.	5.c. Has Baffinland consulted the MHTD regarding the design, timing and location of proposed surveys and ongoing monitoring?	Yes	Yes	Yes	Completed	ESG	Environmental Superintendent	"MHTD Meeting Minutes" (refer to B-22B-32) and "Milne Freshwater Fish Health Study" (refer to B-22B-33) B-24B-12 June MEWG Minutes page 8	Interviewed Environmental and Regulatory Compliance Manager - Baffinland engaged the MHTD in 2021 to develop and implement monitoring arctic char monitoring. A meeting was held in Feb 2021, and scope of work prepared in July 2021 for MHTD review and comment. In the 2024 June MEWG meeting, MHTD suggested the inclusion of cod in the fishes that are monitored.
6	53	The Proponent shall demonstrate consideration for the following (6a-6f): 6.a. Steps taken to prevent caribou mortality and injury as a result of train and vehicular traffic, including operational measures meant to maximize the potential for safe traffic relative to operations on the Milne Inlet Tote Road and associated access roads.	Has Baffinland demonstrated consideration for the following (6a-6f): 6.a. Have measures been taken to prevent caribou mortality and injury from vehicle traffic, particularly the Tote Road and associated access roads?	Yes	No	No	Completed	Site Enviro	Environmental Superintendent	"Terrestrial Environment Mitigation and Monitoring Plan" document, "Mortality" Section 3.3.2.3 (Page 27) (refer to B-23A-1)	
		6.b. Specific measures intended to address the reduced effectiveness of visual protocols for the Milne Inlet Tote Road and access roads/trails during times of darkness and low visibility must be included.	6.b. Have measures been taken to address the effectiveness of visual protocols for the Tote Road and access roads during times of darkness?	Yes	No	No	Completed	Site Enviro	Environmental Superintendent	Refer to B-22B-34 for an example of Tote Road speed adjustments based on weather conditions and visibility. "Terrestrial Environment Mitigation and Monitoring Plan" document, "Mortality" Section 3.3.2.3 (Page 27) (refer to B-23A-1)	Sustainability specialist/Manager, Community Resource Services (Sept 2022) Additionally, Baffinland modifies vehicle speeds along the Tote Road and throughout site based on weather conditions and visibility to ensure that both wildlife and workers remain safe. These modifications are distributed to site personnel in the form of a daily weather report
		6.c. Monitoring and mitigation measures at points where the Tote Road passes through caribou calving areas, particularly during caribou calving times. The details of these monitoring and mitigation measures shall be developed in conjunction with the Terrestrial Environment Working Group.	6.c. Have monitoring and mitigation measures, at points where the Tote Road passes through caribou calving areas, been developed in conjunction with the Terrestrial Environment Working Group?	Yes	Yes	No	Completed	ESG	Environmental Monitoring Specialist	Refer to Section 3.3, Section 4.2.3.2 and Figure 3.2 (Caribou Decision Framework - Tote Road) in B-23A-1 DRAFT Terrestrial Environment Mitigation and Monitoring Plan (TE MMP) Refer to B-24B-8 for CIA Recommendation for Caribou Studies, and B-24B-9 BIM Caribou Study Memo to the TEWG	Regional Monitoring Specialist (Mar 2025): CIA a TEWG member submitted recommendation for caribou studies (B-24B-8) Baffinland replied with a Memo (B-24B-9) and is currently working with Government of Nunavut on developing a caribou studies to determine the Zone of Influence (ZOI) of the mine on caribou.
		6.d. Evaluation of the effectiveness of proposed caribou crossings over the Milne Inlet Tote Road and access roads as well as the appropriate number.	6.d. Have the proposed caribou crossings over the Tote Road and access been evaluated for effectiveness?	Yes	No	No	Completed	Site Enviro	Environmental Superintendent	"Terrestrial Environment Mitigation and Monitoring Plan" document, "Movement" Section 3.3.2.2 (Page 25) (refer to B-23A-1)	
6 (cont'd)	53 (cont'd)	6.e. Protocols for documentation and reporting of all caribou collisions and mortalities.	6.e. Have protocols for documentation and reporting of all caribou collisions and mortalities been established?	Yes	Yes	Yes	Completed	Site Enviro	Environmental Superintendent	Refer to B-22B-35 for internal tracking log that documents all wildlife injuries and mortalities to be included in Terrestrial Environment Annual Monitoring Report (TEAMR). Example included in section 11.1 Wildlife Interactions and Mortalities in the 2021 TEAMR (B-22B-7). "Terrestrial Environment Mitigation and Monitoring Plan" document, "Mortality" Section 3.3.2.3 (Page 27) (refer to B-23A-1) Refer to B-24B-13 2023 Terrestrial Annual Environment Monitoring Report Section 11.4 Refer to B-24A-10 Executive Summary TEAMR pages xiv - Wildlife Interactions and B-24A-11 Caribou Decision Framework	2024A Update Sr. Manager ESG, There is a process for reporting caribou and other animal fatalities. There were no caribou fatalities in 2023 as evidenced in the TEAMR Executive Summary B-24A-10. Like previous years, BIM uses a tracking log to document all wildlife injuries and mortalities, which includes the date, time, and location of the incident, as well as a description. This log is summarized in the Terrestrial Environment Annual Monitoring Report (TEAMR). Another mitigation tool or process is the Tote Road decision Framework. Evidence B-24A-11 caribou decision Framework. This framework is communicated at site to vehicle operators and staff. This was pulled from a recent presentation, can find original if required.

Project Certificate (PC) Conditions

Name of Auditor: BDO Canada LLP

Date of Audit: 30-Jun-24

Completion Rate:	
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Percentage of applicable audit questions with evidence provided supporting completion of the audit question	100%

Concern #	PC Condition #	Commitment Statement	Audit Question	Evidence Provided (Yes / No / N/A)	Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Accountable Manager	Responsible Position	Documented Evidence	Interview Notes
		6.f. as well as mechanisms for adaptive management responses designed to prevent further such interactions.	6.f. Has a mechanism for adaptive management response, which is designed to prevent further caribou interactions, been developed?	Yes	Yes	No	Completed	ESG	Environmental Monitoring Specialist	Refer to Section 3.3, Section 4.2.3.2 and Figure 3.2 (Caribou Decision Framework - Toile Road) in B-23A-1 DRAFT Terrestrial Environment Mitigation and Monitoring Plan (TEMMP) Refer to B-24B-6, B-24B-7 for Caribou Deflections Memo and Pellets Abundance Memo presented to the TEWG in October 2024	Regional Monitoring Specialist (Mar 2025): Buffinland has started developing adaptive mechanism for caribou interactions with the project. Refer to B-24B-6, this memo was presented to the TEWG in October, 2024 and January 2025 for the revision of the definition of deflections by caribou. Once this definition has been agreed and finalized by the TEWG, it will be used to update the Terrestrial environment Monitoring and Mitigation Plan (TEMMP)
7	76	7. The Proponent shall develop a comprehensive Marine Environmental Effects Monitoring Program to address concerns and identify potential impacts of the Project on the marine environment.	7. Has Buffinland developed a comprehensive Environmental Effects Monitoring Program to address concerns and identify potential impacts of the project on the MARINE environment?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to Section 2 of B-23A-9 DRAFT Marine Monitoring Plan Refer to B-24A-1 Final 2023 Marine Environmental Effects Monitoring Report, which outlines the current marine environmental effects monitoring program and results. Refer to 2023 NIRB Annual Report (A-24A-12); Appendix G.6.8	Environmental Monitoring Specialist (Jan 2025): The 2024 Marine Environmental Effects Monitoring Program (MEEMP) was conducted in July of 2024. The report will be completed at the end of Q1 and will be published in the 2024 NIRB Annual Report.
8	83a	8.a. The Proponent shall conduct hydrodynamic modelling in the Milne Inlet Port area to determine the potential impacts arising from disturbance to sediments including re-suspension and subsequent transport and deposition of sediment.	8.a. Has Buffinland conducted hydrodynamic modelling in the Milne Inlet Port area to determine the potential impacts arising from the disturbance to sediments, including re-suspension and subsequent transport and deposition of sediment?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Buffinland Iron Mines 2023 Annual Report to the "Nunavut Impact Review Board" presentation (Page 297-301) (Refer to A-24A-12) Refer to PC T&C No. 84 (p. 302) and T&C No. 85 (p.303) in the 2023 NIRB Annual Report (A-24A-12) Refer to Sections 4.2 and 4.3 in B-23A-5 DRAFT Ship Wake Propeller Wash Report. Refer to Section 3 of B-23A-4 DRAFT Ballast Water Dispersion Modelling Report	Regional Monitoring Specialist (Mar 2025): Ship Wake and Propeller Wash Report was submitted to the NIRB in the 2023 Annual Report.
		8.b. The modelling results shall be used to update the marine water and sediment quality monitoring and mitigation program to include activities associated with the construction and operation of the Milne Inlet Port.	8.b. Have the modeling results been used to update the marine water and sediment quality monitoring and mitigation program to include activities associated with the construction and operation of the Milne Inlet Port?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to B-22B-25A and B-22B-25B showing proposed changes to 2023 program as shared with the Marine Environment Working Group (MEWG) in Feb 2023. Refer to B-23A-11 for email communication from OIA suggesting new site locations to be sampled during MEEMP program to address use of capsize vessels Refer to B-23A-10 for email communication indicating completion of sampling for new sampling sites proposed by OIA	Sustainability Specialist/Manager, Community Resource Services (Sept 2022): Changes and modifications to the 2022 marine environmental effects monitoring program based on previous results were outlined in WSP Galder's presentation to the MEWG on June 14th, 2022 22-Aug-2023 (Sustainability Specialist): In 2023, Buffinland modified its benthic sediment and infaunal monitoring programs by monitoring programs by conducting annual sampling at existing sites SW-1 through SW-4, SE-1 and SW-1, and at two (2) new sites situated to ensure that any changes in bottom scouring by these longer, deeper capsize vessels are captured—onsite offshore the northwest corner of the dock at a similar distance/depth to SW-1, the other between SW-1 and SW-2 but at the 25 m depth contour. The MEEMP continued to monitor these sites in the 2024 field season. This will be reported in the 2024 NIRB Annual Report, which is still been written at this time.
		8.c. The monitoring program shall include an ongoing assessment of the potential introduction of metals that bio-accumulate in the marine food chain.	8.c. Does the monitoring program include an ongoing assessment of the potential introduction of metals that bio-accumulate in the marine food?	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist	Memo submitted to NIRB on Marine Mammal Health Monitoring (Refer to B-22B-5) Refer to B-24B-1 Summary of 2024 Marine monitoring Programs presentation to MEWG pg 16 Refer to B-24A-1 2023 Marine Environmental Effects Monitoring Report, specifically Chapter 7.0 Fish Health and Tissue Chemistry. Refer to PC T&C No. 113, p. 389-394 in A-24A-12 2023 NIRB Annual Report.	Document submitted in response to recommendations/information request from NIRB. Environmental Monitoring Specialist (Jan 2024): Metal concentrations are determined for sediment and water quality samples as per the Marine Environmental Effects Monitoring Program (MEEMP). Refer to B-24B-1 for summary of program, as the 2024 MEEMP Report has not been finalized at the time of this submission.
		8.d. In the 2023 Annual Report, the Proponent is required to provide the Board with updates to the marine water and sediment quality monitoring and mitigation program necessary to reflect the increased use of larger ore vessels (Baby Cape and Capesize) at Milne Port.	8.d. Has the Proponent provided marine water and sediment quality monitoring and mitigation necessary to reflect increased use of larger ore vessels at Milne Port in the 2023 Annual Report?	Yes	No	No	Completed	ESG	Senior Manager Environment Social and Governance	Refer to pages iii and iv of the 2023 Marine Environmental Effects Monitoring Program Report executive Summary B-24A-9 2023 MEEMP Report Executive Summary	2024 Update, Sr. Manager ESG, BIM provided marine and sediment monitoring in 2023 through the Marine Environmental Effects Monitoring Program as evidenced in the TC 83 and the MEEMP Report. Executive Summary as evidence B-24A-9 pages iii and iv.
9	84	9.a. The Proponent shall update its sediment redistribution modeling once ship design has been completed and...	9.a. Has Buffinland updated its sediment redistribution modeling since ship design was completed?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	B-24A-7 Ship Wake and Propeller Wash Assessment Report	Interviewed Sustainability Specialist - Built for purpose ships were not commissioned for this phase of the Project, therefore question is not applicable. 22-Aug-2023 (Sustainability Specialist): Buffinland modelled sediment scour potential for capsize vessels. Results are summarized in Sections 4 and 5 of B-23A-5. Additionally, the sediment sampling for the MEEMP program was modified to address the use of larger vessels (refer to response to Concern #6 for additional details).

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		9.b. sampling should be undertaken to validate the model and to inform sampling sites and the monitoring plan.	9.b. Has sampling been undertaken by Baffinland to validate the model and to inform sampling sites and the monitoring plan?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to Chapter 3.0 Marine Sediment Quality in B-24A-5 2023 Marine Environment Effects Monitoring Report. Refer to B-23A-10 for email communication indicating completed sampling events for new sediment sites.	Interviewed Sustainability Specialist - Built for purpose-ships were not commissioned for this phase of the Project, therefore question is not applicable. Sustainability Specialist (Feb 2023): Baffinland does monitor sediment distribution and quality as part of the MEMP program. Extensive sampling is conducted at targeted sites based on trends and results that may suggest there is a potential Project-related impact.
10	85	10.a. The Proponent shall develop a monitoring plan to verify its impact predictions associated with sediment redistribution resulting from propeller wash in shallow water locations along the shipping route. If monitoring detects negative impacts from sediment redistribution, additional mitigation measures will need to be developed and implemented.	10.a. Has Baffinland developed a monitoring plan to verify its impact predictions associated with sediment redistribution resulting from propeller wash in shallow water locations along the shipping route?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to B-22B-25A and B-22B-25B for 2022 preliminary sediment quality results and proposed 2023 monitoring program presentation. Refer to Chapter 3.0 Marine Sediment Quality in 2023 Marine Environment Effects Monitoring Report (B-24A-5) Refer to Section 3.2 of B-23A-9 DRAFT Marine Monitoring Plan Refer to B-24A-7 Ship Wake and Propeller Wash Assessment Report Refer to B-23A-11 for email communication from CIA suggesting new site locations to be sampled during MEMP program to address use of capsize vessels. Refer to B-23A-10 for email communication indicating completion of sampling for new sampling sites proposed by CIA	Interviewed Sustainability Specialist - PC Condition #85 was designed to address potential ship propeller wash effects in shallow water areas for the Southern Shipping Route, which is not applicable to the current phase of the Project. Sustainability Specialist (Feb 2023): Baffinland is currently developing a ship wake and propeller wash dispersion model as part of the Sustaining Operations Proposal application to the NIRE. This will be finalized in Q1 or Q2 of 2023. For the 2022 field season, the sediment sampling component of the MEMP program still serves as a monitoring method for sediment redistribution. The Marine Environmental Effects Monitoring Plan is also currently being revised to the "Marine Monitoring Plan" and will be released in Q2 of 2023.
		10.b.1. Has the monitoring program detected any negative impacts from sediment redistribution?	10.b.1. Has the monitoring program detected any negative impacts from sediment redistribution?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to Dec 2nd, 2022 MEWG Minutes (B-22B-27) for discussion relating to delineating area scoured by propeller wash. Refer to Ship Wake and Propeller Wash Assessment Report: B-24A-7 Refer to Chapter 3.0 Sediment Quality in 2023 MEMP Report of B-24A-5	Sustainability Specialist (Feb 2023) - While the current sediment sampling program is not based off of a model, it is informed by previous results. There was a grain size anomaly at sampling site SW-02 that was observed in 2021. Extensive sampling was completed in 2022 at SW-02 and preliminary results show that grain size distribution has returned to baseline conditions. Additionally, a small area of propeller wash scour was observed during the 2022 field program, which was discussed at the Dec 2nd, 2022 MEWG meeting. This area is being delineated and further investigated as part of the 2023 MEMP Program.
		10.b.2. If negative impacts from sediment redistribution have been identified, have additional mitigation measures been developed and implemented?	10.b.2. If negative impacts from sediment redistribution have been identified, have additional mitigation measures been developed and implemented?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to Chapter 3.2.2 Modifications to the Program (2023) in B-24A-1 2023 Marine Environmental Effects Monitoring Program. Refer to Section 3.2.4 Program Modifications of B-23A-9 DRAFT Marine Monitoring Plan. Refer to Dec 2nd, 2022 MEWG Minutes (B-22B-27) for discussion relating to delineating area scoured by propeller wash.	Interviewed Sustainability Specialist - PC Condition #85 was designed to address potential ship propeller wash effects in shallow water areas for the Southern Shipping Route, which is not applicable to the current phase of the Project. Sustainability Specialist (Feb 2023) - While the current sediment sampling program is not based off of a model, it is informed by previous results. There was a grain size anomaly at sampling site SW-02 that was observed in 2021. Extensive sampling was completed in 2022 at SW-02 and preliminary results show that grain size distribution has returned to baseline conditions. Additionally, a small area of propeller wash scour was observed during the 2022 field program, which was discussed at the Dec 2nd, 2022 MEWG meeting. This area is being delineated and further investigated as part of the 2023 MEMP Program.
		10.c. In the 2023 Annual Report, the Proponent is required to identify updates to the monitoring plan to reflect the increased use of larger ore vessels (Baby Cape and Capesize) at Mine Port	10.c. Has the Proponent identified updates in the 2023 Annual Report to reflect the increased use of larger ore carriers at Mine Port?	Yes	No	No	Completed	ESG	Senior Manager, ESG	Refer to B-24A-9 2023 MEMP Report Executive Summary and A-24A-12 2023 annual report page: 297-298	This is repetitive with TC 83 evidence but can be found on page 297 of the annual report and in the 2023 MEMP Report executive Summary B-24A-9
11	87	11.a. The Proponent shall develop a detailed monitoring program at a number of sites over the long term to evaluate changes to marine habitat and organisms...	11.a. Has Baffinland developed a detailed monitoring program at a number of sites to evaluate changes to marine habitat and organisms?	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist	"Baffinland Iron Mines 2023 Annual Report to the Nunavut Impact Review Board" Appendix G.6.8 (refer to A-24A-12) Refer to B-24A-1 2023 Marine Environmental Effects Monitoring Program (MEMP) Report Refer to Section 3.0 Component Studies of B-23A-9 DRAFT Marine Monitoring Plan. Refer to B-24B-1 Summary of 2024 Marine Monitoring Program	Environmental Monitoring Specialist (Jan 2025) The Marine Environmental Effects Monitoring Program (MEMP) is run annually including in 2024. Refer to B-24B-1 for a summary of the programs run in 2024 which was presented to the MEWG.
		11.b. and to monitor for non-native introductions resulting from Project-related shipping.	11.b. Does Baffinland monitor for non-native introductions resulting from Project-related shipping?	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist	"Baffinland Iron Mines 2023 Annual Report to the Nunavut Impact Review Board" Appendix G.6.8 (refer to A-24A-12) Refer to Chapter 8.0 Non-Indigenous Species and Aquatic Invasive Species (NIS/AIS) Monitoring Program in B-24A-1 2023 Marine Environmental Effects Monitoring Report Refer to B-23A-12 DRAFT DFO Ballast Water Study Plan Refer to Section 3.7 NIS/AIS of B-23A-9 DRAFT Marine Monitoring Plan. Refer to B-24B-1 Summary of 2024 Marine Monitoring Program page 18-19 Refer to B-23A-2 DRAFT AIS Risk Assessment and Hull Fouling Report Refer to B-24B-2 2024 DFO Ballast Study presentation to MEWG	Environmental Monitoring Specialist (Jan 2025) In 2024 Baffinland and DFO collaborated to run a 4 weeks ballast water study at Mine Port. Like in 2023, this study had a youth training component where youths from Pond Inlet and Sarniagak were trained at port of Burlington. Program run annually including in 2024. Sustainability Specialist (Feb 2023) - As outlined in Part A, Baffinland is currently having bilateral discussions with DFO to discuss the feasibility of a collaborative ballast water sampling program (NIS/AIS) for the upcoming 2023 shipping season. 22-Aug-2023 (Sustainability Specialist) Baffinland has expanded its NIS/AIS monitoring program in 2023 to include a collaborative biological sampling program with DFO. This is scheduled to occur from Sep 29-Oct 4 at Mine Port and will involve sampling ballast tanks on board vessels for NIS/AIS after the water has undergone treatment. This program also involved a training component with Inuit participants at the Port of Burlington in Ontario, which ran from August 11th until the 21st, 2023.

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		11.c. This program needs to be able to detect changes that may have biological consequences and should be initiated several years prior to any ballast water discharge into Stevensby Inlet and Milne Inlet to collect sufficient baseline data and should continue over the life of the Project.	11.c. Does the program detect changes that may have biological consequences, including sufficient baseline data?	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist	"Baffinland Iron Mines 2023 Annual Report to the Nunavut Impact Review Board" Appendix G.6.8 refer to A-24A-12 Refer to Chapter 8.0 Non-Indigenous Species and Aquatic Invasive Species (NIS/AIS) Monitoring Program in B-24A-1 2023 Marine Environmental Effects Monitoring report Refer to B-24B-1 Summary of 2024 Marine Monitoring Program page 18-19 Refer to B-24B-2 2024 DFO Ballast study presentation to MEWG Refer to Chapter 8 in Appendix G.6.9 of B-22A-8 (2022 NIRB Annual Report) Refer to Section 3.7 of B-23A-9 DRAFT Marine Monitoring Plan.	Environment Monitoring Specialist (Jan 2025) Program run annually including in 2024. The 2024 Marine Environmental Effects Monitoring Program (MEEMP) report with the NIS/AIS component has not been completed at the time of this submission.
12	89	12.a. The Proponent shall develop and implement an effective ballast water management program...	12.a. Has Baffinland developed and implemented a ballast water management program?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	"Baffinland Iron Mines 2023 Annual Report to the Nunavut Impact Review Board" in Appendix G.6.8 in A-24A-12 Refer to B-22B-28 Ballast Water Management Plan Refer to B-23A-12 DRAFT DFO Ballast Water Study Plan Refer to slides 44-46 of B-23A-13 - NIRB Marine Mitigation Workshop Slides (ENG, KT) Refer to PC T&C No. 89 (p. 312-316) in A-24A-12 2023 NIRB Annual Report.	Sustainability specialist/Manager, Community Resource Services (Sept 2022); Program run annually including in 2022. Sustainability Specialist (Feb 2023) - The Ballast Water Management Plan is currently being updated and undergoing senior review. A finalized version will be released in Q2 of 2023. 20-Aug-2023 (Sustainability Specialist): Baffinland has expanded its NIS/AIS monitoring program in 2023 to include a collaborative biological sampling program with DFO. This is scheduled to occur from Sep 20-Oct 4 at Milne Port and will involve sampling ballast tanks on board vessels for NIS/AIS after the water has undergone treatment. This program also involved a training component with Inuit participants at the Port of Burlington in Ontario, which ran from August 11th until the 21st, 2023. This program was continued in 2024 and ran for 4 weeks - Aug/Sept, and October.
		12.b. that may include the treatment and monitoring of ballast water discharges in a manner consistent with applicable regulations and/or exceed those regulations if they are determined to be ineffective for providing the desired and predicted results.	12.b. Does the water management program ensure that the treatment and monitoring of ballast water discharges are conducted in a manner consistent with applicable regulations?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	"Baffinland Iron Mines 2023 Annual Report to the Nunavut Impact Review Board" Appendix G.6.8 refer to A-24A-12 "Ballast Water Management Plan", "Relationship to Other Management Plans" section 1.1 (page 5) & Section 1.5.1 (page 6-8) refer to B-22B-28 Refer to slides 44-46 of B-23A-13 - NIRB Marine Mitigation Workshop Slides (ENG, KT) Refer to PC T&C No. 89 (p. 312-316) in A-24A-12 2023 NIRB Annual Report.	Interviewed Sustainability Specialist - NIRB Annual report provides a summary of 2019 results collected through the Marine Environmental Effects Monitoring Program and Aquatic Invasive Species Program. Environmental Monitoring Specialist (Jan 2025) Program runs annually including in 2024.
		12.c. The ballast water management program shall include, without limitation, a provision that requires ship owners to test their ballast water to confirm that it meets the salinity requirements of the applicable regulations prior to discharge at the Milne Port...	12.c. Does the ballast water management program include a provision that requires ship owners to test their ballast water to confirm that it meets the salinity requirements of the applicable regulations prior to discharge at Milne Port?	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page:299-304) Refer to B-22B-28 "Ballast Water Management Plan" document, "Monitoring and Controls" section 3 (Page 12) Refer to slides 44-46 of B-23A-13 - NIRB Marine Mitigation Workshop Slides (ENG, KT) Refer to PC T&C No. 89 (p. 312-316) in A-24A-12 2023 NIRB Annual Report. Refer to B-24B-3 2024 SITM page 11 for Ballast Water Exchange Instructions for vessels Refer to B-24B-4 2024 Milne Inlet Terminal Handbook section 6.2 page 24 on ballast water management procedures at Milne Port	Environment Monitoring Specialist (Jan 2025) Annually including 2024, vessel masters calling at Milne Port are issued Standing Instructions and Milne Inlet terminal handbook with details of ballast water management procedures which includes ballast water exchange and salinity treatment, as well as reporting to Transport Canada, vessels calling at Milne Port meets the International Maritime Organisation D-2 regulations.
12 (cont'd)	89 (cont'd)	12.d. and a requirement noting that the Proponent, in choosing shipping contractors will, whenever feasible, give preference to contractors that use ballast water treatment in addition to ballast water exchange.	12.d. Does Baffinland choose shipping contractors, whenever feasible, that use ballast water treatment in addition to ballast water exchange?	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist/Senior Manager of Environmental/Social Governance	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page:299-304) (refer to B-22B-26) Refer to B-22B-11 "2022 Vessels with BWTs" for summary of vessels that both treated and exchanged ballast water. A summary of ballast water management protocols, including exchange and treatment, for the 2022 season was given slides 11-13 at the June 14th MEWG meeting (refer to B-22B-4). Ballast water management protocols were outlined in slide 17 of the 2022 End of Shipping Season Meeting slide deck (22B-10A and B-22B-10B) presented to the MHFO and Hamlet in Feb. 2023. Refer to B-24B-3 2024 SITM page 11 for Ballast Water Exchange Instructions for vessels	Interviewed Sustainability Specialist (as part of December 2019 report) - All vessels are required to follow regulatory requirements for ballast water exchange, treatment and management. Vessels are in the process of being fitted with treatment systems in a phased manner as required under D2. Compliance with the International Maritime Organization and Transport Canada regulatory standards. All vessels are anticipated to have treatment systems by 2024. Manager, Community Resource Services (Feb 2022): A total of 28 vessels had treatment systems installed on board out of the 38 contracted to BIM in 2021 (see attached list B-22B-11). Those vessels with onboard treatment systems accounted for 35 calls to port out of 73 vessels (75%) that would have released ballast water in Milne Port that has also been treated. Breakdown of type of treatment system is also included (91% electro chlorination, remaining 9% UV). Standing Instructions to Masters 2021 (refer to B-22B-13" SITM 2021) stipulates that all vessels with onboard BTWS treat and exchange water. Sustainability specialist/Manager, Community Resource Services (Sept 2022); Shipping season only begins in July so updates to be provided by end of year on vessel treatment systems. All ships that called to Milne Port in 2024 complied with the IMO's D2 standards.

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13	91	13.a. The Proponent shall develop a detailed monitoring plan for Steensby Inlet and Mine Inlet for fouling that complies with all applicable regulatory requirements and guidelines as issued by Transport Canada...	13.a. Has Baffinland developed a detailed monitoring plan for Steensby Port and Mine Inlet for fouling that complies with all applicable regulatory requirements and guidelines as issued by Transport Canada?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 307-309) (refer to B-22B-26) Refer to B-22B-29 DRAFT 2022 MEEMP Hull Fouling Options Analysis. Refer to B-24A-6 Update AIS Risk Assessment and Hull Fouling Report	Sustainability Specialist (Feb 2022) - Biofouling Options Analysis is still in draft form and will be finalized in Q1 or Q2 of 2023 as part of the Sustaining Operations Proposal Application.
		13.b. and includes sampling areas on ships where antifouling treatment is not applied such as the areas where non-native species are most likely to occur.	13.b. Does this include sampling areas on ships where antifouling treatment is not applied, such as the areas where non-native species are most likely to occur?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to section 6.3.3, p. 1484 of the 2020 Marine Environmental Effects Monitoring Program Report (B-22B-30) Refer to B-22B-29 DRAFT 2022 MEEMP Hull Fouling Options Analysis. Refer to B-24A-6 Updated AIS Risk Assessment and Hull Fouling Report	Interviewed Sustainability Specialist - Extensive surveying is conducted along various areas of the ship (i.e. bow/stern, hull, nose, etc.). Sampling completed and reported in the 2019 NRRB Annual Report and specialized report Draft 2019 Marine Environmental Effects Monitoring Program (MEEMP) and Aquatic Invasive Species (AIS) Monitoring Program. Sustainability specialist/Manager, Community Resource Services (Sept 2022): Ship hull biofouling has been included in the NIS/AIS program since 2018 and consists of conducting under water video surveys of the hulls or one camera using ROV based underwater video system.
14	104	Subject to safety considerations and the potential for conditions as determined by the crew of transiting vessels, to result in route deviations.	Subject to safety considerations and the potential for conditions as determined by the crew of transiting vessels, to result in route deviations.	Not Applicable	No	No	Not Started	ESG	Environmental Monitoring Specialist	N/A	Interviewed Sustainability Specialist - This phase of the Project is not currently active therefore question is not applicable.
		14.a. The Proponent shall require, for shipping to/from Steensby Port, project vessels to maintain a route to the south of Mill Island to prevent disturbance to walrus and walrus habitat on the northern shore of Mill Island.	14.a. Does Baffinland ensure project vessels shipping to/from Steensby Port maintain a route to the south of Mill Island to prevent disturbance to walrus and walrus habitat on the northern shore of Mill Island?	Not Applicable	No	No	Completed	ESG	Environmental Monitoring Specialist	N/A	Interviewed Sustainability Specialist - This phase of the Project is not currently active therefore question is not applicable.
		14.b. Where project vessels are required to transit to the north of Mill Island owing to environmental or other conditions, an incident report is to be provided to the Marine Environment Working Group and the NRRB within 30 days...	14.b. If project vessels are required to transit to the north of Mill Island due to environmental or other conditions, does Baffinland provide an incident report to the Marine Environment Working Group and the NRRB within 30 days?	Not Applicable	No	No	Completed	ESG	Environmental Monitoring Specialist	N/A	Interviewed Sustainability Specialist - This phase of the Project is not currently active therefore question is not applicable.
		14.c. noting all wildlife sightings and interactions as recorded by shipboard monitors.	14.c. Does the incident report note all wildlife sightings and interactions as recorded by shipboard monitors?	Not Applicable	No	No	Completed	ESG	Environmental Monitoring Specialist	N/A	22-Aug-2022 (Sustainability Specialist) - This Phase of the Project is currently inactive and therefore the question is not applicable. No vessels are transiting north of Mill Island, therefore no incident report is developed and no wildlife sightings/interactions are recorded. Note that the SBO program and MMON programs do occur for the northern shipping route (not applicable to this line item).
		14.d. The Proponent shall summarize all incidences of significant deviations from the nominal shipping routes for traffic to/from Mine Port and Steensby Port as presented in the FEIS and FEIS Addendum to the NRRB annually...	14.d. Does Baffinland give instructions to vessel captains to avoid significant deviations from the nominal shipping routes for traffic to/from Mine Port and Steensby Port, subject to safety considerations as determined by the crew, and summarize all incidences of significant deviations from the nominal shipping routes for traffic to/from Mine Port and Steensby Port, as presented in the FEIS and FEIS Addendum to the NRRB annually?	Yes	No	No	Completed	ESG	Engagement Lead/ Manager of Environmental Social Governance	Refer to A-24A-4 2024 Standing Instructions to Vessel Masters (A-24A-4), which is distributed to all vessel owners and operators. All deviations from the shipping route are tracked by the community-based shipping monitors and captured in a deviation report (refer to B-22B-14 for an example).	Regional Monitoring Specialist (Sept 2024): Project vessels are required to stay on the nominal shipping route during the shipping season, except for safety reasons. In 2024, there were deviations to avoid collision with drifting icebergs.
		14.e. with corresponding discussion regarding justification for deviations and any observed environmental impacts.	14.e. Has a corresponding discussion occurred regarding justification for deviations and any observed environmental impacts?	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to B-24A-8a and B-24A-8b for examples of Ship Deviation Reports Refer to PC T&C No. 103 (p. 350-357) and T&C 120 (p. 405-406) in A-24A-12 2023 NRRB Annual Report. Shipping monitor daily reports to address any deviations A-24B - 9 - Shipping Monitor Tracking - 2024 Oct Communications from ship captains to Fednav with any deviations from designated shipping route. Refer to A-24B - 7 Golden Fast (TLN-51) Deviation Report 17 Sep 2024	Regional Monitoring Specialist (Sept 2024): Project vessels are required to stay on the nominal shipping route during the shipping season, except for safety reasons. In 2024, there were deviations to avoid collision with drifting icebergs.
15	105	15.a. The Proponent shall ensure that measures to reduce the potential for interaction with marine mammals, particularly in Hudson Strait and Mine Inlet, are identified and implemented prior to commencement of shipping operations. These measures could include, but are not limited to...	15.a. Has Baffinland reduced the potential for interaction with marine mammals, particularly in Hudson Strait and Mine Inlet?	Yes	No	No	Completed	ESG	Senior Manager of Environmental Social Governance	Refer to Table 5.1, p. 19-20, Mitigation Measures for Marine Mammals in the 2024 NRRB Marine Shipping and Vessel Management Report (A-24A-12) Refer to A-23A-19 and A-23A-16 Refer to section 5.2 of the 2022 Narwhal Adaptive Management Response Plan, p. 19, of the 2022 Shipping and Marine Wildlife Management Plan, Appendix 1, of the 2022 NRRB Marine Shipping and Vessel Management Report (B-22B-12).	Sustainability Specialist (Feb 2023) The Shipping and Marine Wildlife Management Plan is currently undergoing revisions and an updated version will become available in Q1 or Q2 of 2023.
		15.c. Reduced shipping speeds where ship-marine mammal interactions are most likely	15.c. Has Baffinland reduced shipping speeds where ship-marine mammal interactions are most likely?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to Table 5.1, p. 19-20 in the 2024 NRRB Marine Shipping and Vessel Management Report (A-24A-12). Refer to Section 2: Navigation in A-24A-4 2024 Standing Instructions and General Information for Masters of Vessels (SITM).	Interviewed Sustainability Specialist (as part of December 2019 report) - Speeds have been reduced below project requirements (should be 7-10 knots) as Baffinland has communicated and enforced a speed limit of 9 knots for all Baffinland-contracted vessels throughout the 2019 shipping season. Sustainability specialist/Manager, Community Resource Services (Sept 2022): Baffinland continues to enforce a speed limit of 9 mph for all Baffinland contracted vessels. The MMTO recommended a further reduction in speed and Baffinland explored this option and determined that speeds cannot be lowered for various reasons.

Project Certificate (PC) Conditions

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16	106	16.a. The Proponent shall ensure that shipboard observers are employed during seasons where shipping occurs	16.a. Has Baffinland ensured that shipboard observers are employed during seasons where shipping occurs?	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to B-24B-1 Summary of 2024 Marine programs page 34	<p>Regional Monitoring Specialist (Jan 2025):</p> <p>In 2024, participants were mobilised to conduct SBO program from 21 - 30 October. However, this program was cancelled due to absence of ice in the RSA.</p> <p>Sustainability specialist/Manager, Community Resource Services (Sept 2022): Baffinland will be conducting a two-week shipboard observer program in October, 2022, which was outlined in the June 14th, 2022 MEWG meeting by WSP Golder</p> <p>Sustainability Specialist (Feb 2023): The SBO Program was not run in 2022 due to unsafe ice conditions at the end of the season that prevented vessel transits. The Marine Mammal Observation Network (MMON) program was conducted again this year and results will be captured in the 2022 NRB Report.</p>
		16.b. and provided with the means to effectively carry out assigned duties.	16.b. Has Baffinland provided shipboard observers with the means to carry out assigned duties?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to B-22B-16 for the SBO Training Manual that is provided to participants. 2023 training will be consistent with 2019.	<p>Regional Monitoring Specialist (Jan 2025):</p> <p>Although the SBO program was cancelled in 2024, participants updated their certifications including Personal Survival Techniques (PST) training certification</p> <p>Sustainability specialist/Manager, Community Resource Services (Sept 2022):</p> <p>All SBOs undergo internal training with WSP Golder, and must complete their marine standard for training, certification, and watchkeeping (STCW) certificate prior to participating in the program.</p> <p>SBO Training Manual that is provided to participants. This manual was used during the last SBO program in 2019 and will be consistent with training provided for 2022.</p>
17	109	17.a. The Proponent shall conduct a monitoring program to confirm the predictions in the FES with respect to disturbance effects from ships noise on the distribution and occurrence of marine mammals.	17.a. Has a monitoring program been implemented that confirms the predictions in the FES with respect to disturbance effects from ships noise on the distribution and occurrence of marine mammals?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	<p>Refer to Appendix G.6.7 and G.6.2 in A-24A-12 (2023 NRB Annual Report) for the 2023 Brucehead Shore-based Monitoring Report and Marine Mammal Aerial Survey Report, respectively</p> <p>Refer to Table 4.24 Marine Mammals Impact Evaluation in A-24A-12 NRB Annual Report (p. 332)</p> <p>Refer to Section 3.8 in B-23A-9 DRAFT Marine Monitoring Plan.</p>	<p>Sustainability specialist/Manager, Community Resource Services (Sept 2022): Note that the 2021 final marine reports are not available for release at the time of this submission and are expected to be completed by the end of Q3 2022 but results were made available in the 2021 NRB Annual report.</p> <p>Sustainability Specialist (Feb 2023): Vessel convoys were introduced for the first time during the 2022 shipping season to reduce total duration of sound exposure. The acoustic monitoring results comparing ship convoys to individual transits are outlined in the 2022 Vessel Convoy Analysis Preliminary Report.</p>
		17.b. The survey shall be designed to address effects during the shipping seasons, and include locations in Hudson Strait.	17.b. Has the survey been designed to address affects during the shipping seasons, and include locations in Hudson Strait?	Not Applicable	No	No	Completed	ESG	Environmental Monitoring Specialist	N/A	Interviewed Sustainability Specialist - This phase of the Project is not currently active therefore question is not applicable.
		17.c. Foxe Basin,	17.c. Foxe Basin?	Not Applicable	No	No	Completed	ESG	Environmental Monitoring Specialist	N/A	Interviewed Sustainability Specialist - This phase of the Project is not currently active therefore question is not applicable.

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17 (cont'd)	109 (cont'd)	17.d. Milne Inlet.	17.d. Milne Inlet?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to B-24A-3 for the 2023 Passive Acoustic Monitoring Program Report (B-24A-3 not available, but included in A-21-12, Appendix G.6.5 - 2023 underwater Acoustic Monitoring Program) Refer to Appendix G.6.7 and G.6.2 in A-24A-12 (2023 NIRB Annual Report) for the Final 2022 Brucehead Shore-based Monitoring Report and Marine Mammal Aerial Survey Report, respectively Refer to Table 4.24 Marine Mammals Impact Evaluation in A-23A-12 2023 NIRB Annual Report (p. 332) Refer to Section 3.8 in B-23A-9 DRAFT Marine Monitoring Plan.	Regional Monitoring Specialist (Jan 2025): Note that the 2024 final marine reports are not available for release at the time of this submission and are expected to be completed by the end of Q2 2025. These results will be presented as part of 2024 Annual Report to the NIRB
		17.e. Eclipse Sound.	17.e. Eclipse Sound?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to Appendix G.6.5 in A-24A-12 (2023 NIRB Annual Report) for the 2023 Passive Acoustic Monitoring Program Report. Refer to B-24A-3 2023 Acoustic Monitoring Program Report (B-24A-3 not available, but included in A-21-12, Appendix G.6.5 - 2023 underwater Acoustic Monitoring Program) Refer to Appendix G.6.7 and G.6.2 in A-24A-12 (2023 NIRB Annual Report) for the 2023 Brucehead Shore-based Monitoring Report and Marine Mammal Aerial Survey Report, respectively Refer to Table 4.24 Marine Mammals Impact Evaluation in A-24A-12 2023 NIRB Annual Report (p. 332) Refer to Section 3.8 in B-23A-9 DRAFT Marine Monitoring Plan.	Regional Monitoring Specialist (Jan 2025): Note that the 2024 final marine reports are not available for release at the time of this submission and are expected to be completed by the end of Q2 2025. These results will be presented as part of 2024 Annual Report to the NIRB
		17.f. and Pond Inlet.	17.f. and Pond Inlet?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to B-24A-3 for the 2023 Passive Acoustic Monitoring Program Report. (B-24A-3 not available, but included in A-21-12, Appendix G.6.5 - 2023 underwater Acoustic Monitoring Program) Refer to Appendix G.6.7 and G.6.2 in A-24A-12 (2023 NIRB Annual Report) for the 2023 Brucehead Shore-based Monitoring Report and Marine Mammal Aerial Survey Report, respectively Refer to Table 4.24 Marine Mammals Impact Evaluation in A-24A-12 2023 NIRB Annual Report (p. 332) Refer to Section 3.8 in B-23A-9 DRAFT Marine Monitoring Plan.	Regional Monitoring Specialist (Jan 2025): Note that the 2024 final marine reports are not available for release at the time of this submission and are expected to be completed by the end of Q2 2025. These results will be presented as part of 2024 Annual Report to the NIRB
		17.g. The survey shall continue over a sufficiently lengthy period to determine the extent to which habituation occurs for narwhal...	17.g. Has monitoring been conducted to determine the extent to which habituation occurs for narwhal? (Auditor to record # years of monitoring in Evidence cell.)	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to B-24A-3 for the 2023 Passive Acoustic Monitoring Program Report. (B-24A-3 not available, but included in A-21-12, Appendix G.6.5 - 2023 underwater Acoustic Monitoring Program) Refer to Appendix G.6.7 and G.6.2 in A-24A-12 (2023 NIRB Annual Report) for the 2023 Brucehead Shore-based Monitoring Report and Marine Mammal Aerial Survey Report, respectively Refer to Table 4.24 Marine Mammals Impact Evaluation in A-24A-12 2023 NIRB Annual Report (p. 332) Refer to Section 3.8 in B-23A-9 DRAFT Marine Monitoring Plan.	Regional Monitoring Specialist (Jan 2025): Note that the 2024 final marine reports are not available for release at the time of this submission and are expected to be completed by the end of Q2 2025. These results will be presented as part of 2024 Annual Report to the NIRB Auditor can refer to A-24A-9 for frequency of marine monitoring programs dating back to 2008.
		17.h. Beluga...	17.h. Beluga?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to B-24A-3 for the 2023 Passive Acoustic Monitoring Program Report. (B-24A-3 not available, but included in A-21-12, Appendix G.6.5 - 2023 underwater Acoustic Monitoring Program) Refer to Appendix G.6.7 and G.6.2 in A-24A-12 (2023 NIRB Annual Report) for the 2023 Brucehead Shore-based Monitoring Report and Marine Mammal Aerial Survey Report, respectively Refer to Table 4.24 Marine Mammals Impact Evaluation in A-24A-12 2023 NIRB Annual Report (p. 332) Refer to Section 3.8 in B-23A-9 DRAFT Marine Monitoring Plan. Refer to PC T&C No. 109, Section 4, p. 385 of B-23A-8 2022 NIRB Annual Report.	Regional Monitoring Specialist (Jan 2025): Note that the 2024 final marine reports are not available for release at the time of this submission and are expected to be completed by the end of Q2 2025. These results will be presented as part of 2024 Annual Report to the NIRB
		17.i. Bowhead...	17.i. Bowhead?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to B-24A-3 for the 2023 Passive Acoustic Monitoring Program Report. (B-24A-3 not available, but included in A-21-12, Appendix G.6.5 - 2023 underwater Acoustic Monitoring Program) Refer to Appendix G.6.7 and G.6.2 in A-24A-12 (2023 NIRB Annual Report) for the 2023 Brucehead Shore-based Monitoring Report and Marine Mammal Aerial Survey Report, respectively Refer to Table 4.24 Marine Mammals Impact Evaluation in A-24A-12 2023 NIRB Annual Report (p. 332) Refer to Section 3.8 in B-23A-9 DRAFT Marine Monitoring Plan. Refer to PC T&C No. 109, Section 4, p. 385 of B-23A-8 2022 NIRB Annual Report.	Regional Monitoring Specialist (Jan 2025): Note that the 2024 final marine reports are not available for release at the time of this submission and are expected to be completed by the end of Q2 2025. These results will be presented as part of 2024 Annual Report to the NIRB
		17.j. and Walrus?	17.j. and Walrus?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to B-24A-3 for the 2023 Passive Acoustic Monitoring Program Report. (B-24A-3 not available, but included in A-21-12, Appendix G.6.5 - 2023 underwater Acoustic Monitoring Program) Refer to Appendix G.6.7 and G.6.2 in A-24A-12 (2023 NIRB Annual Report) for the 2023 Brucehead Shore-based Monitoring Report and Marine Mammal Aerial Survey Report, respectively Refer to Table 4.24 Marine Mammals Impact Evaluation in A-24A-12 2023 NIRB Annual Report (p. 332) Refer to Section 3.8 in B-23A-9 DRAFT Marine Monitoring Plan. Refer to PC T&C No. 109, Section 4, p. 385 of B-23A-8 2022 NIRB Annual Report.	Regional Monitoring Specialist (Jan 2025): Note that the 2024 final marine reports are not available for release at the time of this submission and are expected to be completed by the end of Q2 2025. These results will be presented as part of 2024 Annual Report to the NIRB

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18	110	18.a. The Proponent shall immediately develop a monitoring protocol that includes, but is not limited to, acoustical monitoring...	18.a. Has Baffinland developed a monitoring protocol that includes, but is not limited to, acoustical monitoring?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to B-24A-3 for the 2023 Passive Acoustic Monitoring Program Report. (B-24A-3 not available, but included in A-21-12, Appendix G.6.5 - 2023 underwater Acoustic Monitoring Program) Refer to B-22B-31 "2022 Vessel Convoy Analysis Preliminary Report." Refer to Table 4.24 Marine Mammals Impact Evaluation in A-23A-12 2023 NRB Annual Report (p. 332) Refer to Section 3.8 in B-23A-9 DRAFT Marine Monitoring Plan.	Regional Monitoring Specialist (Jan 2025): Note that the 2024 final MMAS report is not available for release at the time of this submission and is expected to be completed by the end of Q3 2025.
		18.b. to facilitate assessment of the potential short term, long term, and cumulative effects of vessel noise on marine mammals and marine mammal populations.	18.b. Does the protocol facilitate assessment of the potential short term, long term, and cumulative effects of vessel noise on marine mammals and marine mammal populations?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to B-24A-3 for the 2023 Passive Acoustic Monitoring Program Report. (B-24A-3 not available, but included in A-21-12, Appendix G.6.5 - 2023 underwater Acoustic Monitoring Program) Refer to B-22B-31 "2022 Vessel Convoy Analysis Preliminary Report." Refer to Table 4.24 Marine Mammals Impact Evaluation in A-24A-12 2023 NRB Annual Report (p. 332) Refer to Section 3.8 in B-23A-9 DRAFT Marine Monitoring Plan.	Regional Monitoring specialist (Jan 2025) Note that the 2024 final MMAS report is not available for release at the time of this submission and is expected to be completed by the end of Q3 2025.
		18.c. The Proponent is expected to work with the Marine Environment Working Group to determine appropriate early warning indicator(s) that will ensure rapid identification of negative impacts along the southern and northern shipping routes.	18.c. Is Baffinland working with the Marine Environment Working Group to determine appropriate early warning indicators that will ensure rapid identification of negative impacts along the northern shipping routes?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to Section 4, PC T&C No. 103, p. 352-357 in A-24A-12 2023 NRB Annual Report. Refer to Table 5.1 in B-23A-9 DRAFT Marine Monitoring Plan. Refer to Appendix G.6.6 EWI Memo in A-24A-12 NRB Annual Report.	Sustainability specialist/Manager, Community Resource Services (Sept 2022): WSP Golder is currently drafting an EWI Memo to be circulated to the MEWG. Sustainability Specialist (Feb 2023) - Baffinland is currently revising the Marine Monitoring Plan (previously the Marine Environmental Effects Monitoring Plan) to include a Threshold Action Response Plan (TARP) based on feedback from the MEWG. The TARP and early warning indicators (EWI) were to be discussed at the Feb 2023 MEWG meeting, however, the DRAFT Plan was not yet complete. The EWI will be included in the 2024 NRB Annual Report which is currently being written.
19	111	19.a. The Proponent shall develop clear thresholds for determining if negative impacts as a result of vessel noise are occurring.	19.a. Has Baffinland developed clear thresholds for determining if negative impacts as a result of vessel noise are occurring?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to Table 5.1 in B-23A-9 DRAFT Marine Monitoring Plan. Refer to Appendix G.6.5 in A-24A-12 (2023 NRB Annual Report) for the 2023 Passive Acoustic Monitoring Program Report. Refer to B-22B-31 "2022 Vessel Convoy Analysis Preliminary Report." Refer to Table 4.24 Marine Mammals Impact Evaluation in A-24A-12 2023 NRB Annual Report (p. 332)	Sustainability specialist/Manager, Community Resource Services (Sept 2022):
		19.b. Mitigation and adaptive management practices shall be developed to restrict negative impacts as a result of vessel noise. This shall include, but not be limited to, ...	19.b. Have mitigation and adaptive management practices been developed to restrict negative impacts as a result of vessel noise?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to Section 4, PC T&C No. 111, p. 384-386 in A-24A-12 2023 NRB Annual Report. Refer to Table 5.1 in B-23A-9 DRAFT Marine Monitoring Plan. Refer to slides 10-14, 39-42, 47-49 in B-23A-13 2023 NRB Marine Mitigation Workshop Slides (ENG, IKT) Refer to Section 5.1 and Table 5.1 in A-24A-6 2024 Marine Shipping and Vessel Management Report.	Regional Monitoring Specialist (Jan 2025): In 2023, Baffinland started the implementation of shipping convoy. Acoustic data indicates that when one carrier transits together, there is an overall reduction in total sound exposure compared to individual vessel transits. This mitigation strategy was continued in 2024.
		19.c. Identifications of zones where cumulative noise could be mitigated due to biophysical features (e.g., water depth, distance from migration routes, distance from overwintering areas etc.)	19.c. Have zones been identified where cumulative noise could be mitigated due to biophysical features (e.g., water depth, distance from migration routes, distance from overwintering areas etc.)?	Not Applicable	No	No	Completed	ESG	Environmental Monitoring Specialist	Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board' presentation (Page 381-384, 385-388) (Refer to B-22B-26)	Interviewed Sustainability Specialist (as part of December 2019 report) - Baffinland has not completed this exercise. They have not defined bathymetry or seafloor geosoundings along the entire shipping route, though some assumptions are made in modelling where information is available. Sustainability specialist/Manager, Community Resource Services (Sept 2022): Shipping is limited to July to October only and away from overwintering areas

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		19.d. Vessel transit planning, for all seasons, to determine the degree to which cumulative sound impacts can be mitigated through the seasonal use of different zones	19.d. Has vessel transit planning, for all seasons, determined the degree to which cumulative sound impacts can be mitigated through the seasonal use of different zones?	Not Applicable	No	No	Completed	ESG	Environmental Monitoring Specialist	Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board presentation (Page 381-384, 385-386) (Refer to B-228-26)	Interviewed Sustainability Specialist (as part of December 2019 report) - Baffinland has not completed this exercise. They have not defined bathymetry or seafloor geoaoustics along the entire shipping route, though some assumptions are made in modelling where information is available. Sustainability Specialist/Manager, Community Resource Services (Sept 2022): Shipping is limited to July to October only and away from overwintering areas
20	112	20.a. Prior to commercial shipping of iron ore, the Proponent, in conjunction with the Marine Environment Working Group, shall develop a monitoring protocol that includes, but is not limited to, acoustical monitoring that provides an assessment of the negative effects (short and long term cumulative) of vessel noise on marine mammals.	20.a. Has Baffinland, in conjunction with the Marine Environment Working Group, developed a monitoring protocol that includes acoustical monitoring that provides an assessment of the negative effects (short, long term and cumulative) of vessel noise on marine mammals?	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to B-24A-3 for the 2023 Passive Acoustic Monitoring Program Report. (B-24A-3 not available, however acoustic monitoring program is provided in 2023 NIRB (A-24A-12, Appendix G.6.5 - 2023 underwater Acoustic Monitoring Program) Refer to B-228-31 "2022 Vessel Convoy Analysis Preliminary Report." Refer to Table 4.24 Marine Mammals Impact Evaluation in A-24A-12 2023 NIRB Annual Report (p. 332) Refer to Section 3.8 in B-23A-9 DRAFT Marine Monitoring Plan. B-24B-5 June 2024 MEWG Minutes B-24B - 10 - 5 Year Marine Environment Monitoring Plan	Regional Monitoring Specialist (Feb 2025) Baffinland presented the five year monitoring plan (B-24B-10) to the MEWG. This plan included Acoustic Monitoring.
		20.b. Monitoring protocols will need to carefully consider the early warning indicator(s) that will be best examined to ensure rapid identification of negative impacts.	20.b. Do monitoring protocols carefully consider the early warning indicators to ensure rapid identification of negative impacts?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to B-24A-3 for the 2023 Passive Acoustic Monitoring Program Report. Refer to B-228-31 "2022 Vessel Convoy Analysis Preliminary Report." Refer to Table 4.24 Marine Mammals Impact Evaluation in A-24A-12 2023 NIRB Annual Report (p. 332) Refer to Section 3.8 and Table 5.1 in B-23A-9 DRAFT Marine Monitoring Plan. Refer to Section 4, PC T&C No. 103, p. 329-333 in A-24A-12 2023 NIRB Annual Report. Refer to Appendix G.6.6 EWI Memo in A-24A-12 2023 NIRB Annual Report.	
		20.c. Thresholds shall be developed to determine if negative impacts as a result of vessel noise are occurring.	20.c. Has a threshold for negative impacts caused by vessel noise been developed?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to Table 5.1 in B-23A-9 DRAFT Marine Monitoring Plan. Refer to PC T&C No. 109, Section 4, p. 373-377 of a-24A-12 2023 NIRB Annual Report.	
		20.d. Mitigation and adaptive management practices shall be developed to restrict negative impacts as a result of vessel noise. This shall include, but not be limited to, ...	20.d. Have mitigation and adaptive management practices been developed to restrict negative impacts as a result of vessel noise?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to Section 4, PC T&C No. 111, p. 384 - 386 in A-24A-12 2023 NIRB Annual Report. Refer to Table 5.1 in B-23A-9 DRAFT Marine Monitoring Plan. Refer to slides 10-14, 39-42, 47-49 in B-23A-13 2023 NIRB Marine Mitigation Workshop Slides (ENG, IKT) Refer to Section 5.1 and Table 5.1 in B-23A-7 2023 Marine Shipping and Vessel Management Report.	22-Aug-2023 (Sustainability Specialist) - Note that this concern is a repeat of 19b.
		20.e. Identification of zones where noise could be mitigated due to biophysical features (e.g. water depth, distance from migration routes, distance from overwintering areas etc.)	20.e. Have zones been identified where noise could be mitigated due to biophysical features (e.g. water depth, distance from migration routes, distance from overwintering areas etc.)?	Not Applicable	No	No	Completed	ESG	Environmental Monitoring Specialist	Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board presentation (Page 381-384, 385-386) (Refer to B-228-26)	Sustainability Specialist (Feb 2023) - The 2022 Mine Inlet Freshwater Fish Health Assessment Field Program results are still under review and will be released in Q2 of 2023. 22-Aug-2023 (Sustainability Specialist) - note that this concern is a repeat of 19c.
		20.f. A monitoring and mitigation plan is to be developed, and approved by Fisheries and Oceans Canada prior to the commencement of blasting in marine areas	20.f. Has a monitoring and mitigation plan been developed, and approved by Fisheries and Oceans Canada, prior to the commencement of blasting in marine areas?	Not Applicable	No	No	Completed	ESG	Environmental Monitoring Specialist	Baffinland Iron Mines 2020 Annual Report to the Nunavut Impact Review Board presentation (Page 392-393) (Refer to B-228-26)	Environmental Monitoring Specialist (Sept 2024): Not applicable in 2024. Blasting not occurring.

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21	113	21.a. The Proponent shall conduct monitoring of marine fish and fish habitat, which includes but is not limited to, monitoring for Arctic Char	21.a. Does Baffinland conduct monitoring of marine fish and fish habitat, which includes but is not limited to, monitoring for Arctic Char?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to PC T&C No. 113, Section 4, p. 389-394 in A-24A-12 2023 NRB Annual Report. Refer to Appendix G.4.3 Freshwater Fish Health Report in B-23A-9 2022 NRB Annual Report. Refer to Chapters 6 and 7 in Appendix G.6.9 2023 MEEEMP Report in A-24A-12 2023 NRB Annual Report.	Regional Monitoring Specialist (Jan 2025): Arctic char is one of the fish species that is monitored under the MEEEMP program. The 2024 MEEEMP report is still being developed during this reporting period. It will be published in the 2024 Annual Report to the NRB.
		21.b. stock size and health condition in Steensby Inlet, as recommended by the Marine Environment Working Group	21.b. Does the monitoring measure stock size and health condition in Steensby Inlet, as recommended by the Marine Environment Working Group?	Not Applicable	No	No	Completed	ESG	Environmental Monitoring Specialist	N/A	Environmental Monitoring Specialist (Sept 2024) - We have started freshwater baseline studies for our permits for Steensby, but fish health monitoring hasn't started yet, it will start when construction/operations begin. Therefore question is not applicable.
		21.c. stock size and health condition in Milne Inlet, as recommended by the Marine Environment Working Group	21.c. Does the monitoring measure stock size and health condition in Milne Inlet as recommended by the Marine Environment Working Group?	Yes	Yes	No	Completed	ESG	Environmental Monitoring Specialist	Refer to PC T&C No. 113, Section 4, p. 389-394 in A-24A-12 2023 NRB Annual Report. Refer to Chapters 6 and 7 in Appendix G.6.9 2023 MEEEMP Report in A-24A-12 2023 NRB Annual Report. Refer to B-24B-1 Summary of 2024 Marine Programs Presented to the MEWG	Sustainability Specialist/Manager, Community Resource Services (Sept 2022): Program run annually and reported in annual report to the NRB.

Project Certificate (PC) Conditions

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Date of Audit: 30-Jun-24

Completion Rate:	
Total # of audit questions with evidence provided supporting completion of the audit question	77
Percentage of applicable audit questions with evidence provided supporting completion of the audit question	100%

Concern #	PC Condition #	Commitment Statement	Audit Question	Evidence Provided (Yes / No / N/A)	Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Accountable Manager	Responsible Position	Documented Evidence	Interview Notes
22	120	22.a. The Proponent shall ensure that, subject to vessel and human safety considerations, all project shipping adheres to the following mitigation procedures while in the vicinity of marine mammals...	22.a. Has Baffinland ensured that, subject to vessel and human safety considerations, all project shipping adheres to mitigation procedures while they are in the vicinity of marine mammals?	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to Table 3 in the 2024 Standing Instructions and General Information of Vessels Loading at Milne Inlet (A-24A-4). Refer to Section 5 of the 2024 NIRB Marine Shipping and Vessel Management Report (A-24A-6). Refer to B-24B-4 2024 Terminal Information Handbook for Milne Terminal	Regional Monitoring Specialist (Jan 2025): Annually, vessels calling at Milne Port are issued with the Terminal Information Handbook and Standing Instructions and General Information to Masters of Vessels Loading at Milne Port
		22.b. Wildlife will be given right of way	22.b. Has Baffinland ensured that wildlife will be given the right of way?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to Table 3 in the 2024 Standing Instructions and General Information of Vessels Loading at Milne Inlet (A-24A-4). Refer to Section 5 of the 2024 NIRB Marine Shipping and Vessel Management Report (A-24A-6). Refer to PC T&C No. 120, Section 4, p. 405-406 of the 2023 NIRB Annual Report (A-24A-12).	Regional Monitoring Specialist (Jan 2025): Annually, vessels calling at Milne Port are issued with the Standing Instructions and General Information to Masters of Vessels Loading at Milne Port. Table 3 provides guidance to be adhered to when marine mammals are sighted and Masters do their utmost to abide by the instructions.
		22.c. Ships will when possible, maintain a straight course and constant speed, avoiding erratic behavior	22.c. Has Baffinland ensured that ships will, when possible, maintain a straight course and constant speed, avoiding erratic behavior?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to B-22B-33, "2022 End of Shipping Season Meeting Minutes," p. 3 Refer to Section 2 in the 2024 Standing Instructions and General Information of Vessels Loading at Milne Inlet (A-24A-4) Refer to Section 5 of the 2024 NIRB Marine Shipping and Vessel Management Report (A-24A-6). Refer to PC T&C No. 120, Section 4, p. 394-397 of the 2022 NIRB Annual Report (B-23A-8). Refer to slide 48 in B-23A-13 2022 NIRB Mitigation Workshop Presentation (ENG, IKT)	Sustainability Specialist (Feb 2023) - Vessels are required to travel as close to the nominal shipping route as possible. If a vessel moves out of the lane by more than 1 nautical mile, a deviation report (B-22B-14) is created and the Port Captains are notified. This process is captured on p. 3 of B-22B-33.
		22.d. When marine mammals appear to be trapped or disturbed by vessel movements, the vessel will implement appropriate measures to mitigate disturbance, including stoppage of movement until wildlife have moved away from the immediate area.	22.d. Has Baffinland ensured that when marine mammals appear to be trapped or disturbed by vessel movements, the vessel will implement appropriate measures to mitigate disturbance, including stoppage of movement until wildlife have moved away from immediate area?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to PC T&C No. 121, Section 4, p. 407-408 in A-24A-12 2023 NIRB Annual Report. Refer to the 2024 Standing Instructions and General Information of Vessels Loading at Milne Inlet (A-24A-4). Refer to Section 4 in B-24A-4 for the 2023 Marine Mammal Aerial Survey Program Report.	Regional Monitoring Specialist (Mar 2025): Log 3 survey did not happen in the 2024 monitoring season because there was no ice at the end of the shipping season.
23	121	23a. The Proponent shall immediately report any accidental contact by project vessels with marine mammals or seabird colonies to Fisheries and Oceans Canada and Environment Canada...	23.a. Has Baffinland ensured Fisheries and Oceans Canada and Environment Canada are contacted immediately should any accidental contact by project vessels with marine mammals or seabird colonies occur?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to PC T&C No. 123, Section 4, p. 411-412 in A-24A-12 2023 NIRB Annual Report. Refer to Section 3.8.4 of B-23A-9 DRAFT Marine Monitoring Plan.	22-Aug-2023 (Sustainability Specialist): There have been no vessel strikes with wildlife to date and therefore no reports to DFO.
		23.b. (And), by notifying the appropriate regional office of the: • Date, time and location of the incident; • Species of marine mammal or seabird involved; • Circumstances of the incident; • Weather and sea conditions at the time; • Observed state of the marine mammal or seabird colony after the incident; and, • Direction of travel of the marine mammal after the incident, to the extent that it can be determined.	23.b. Does Baffinland also notify the appropriate regional office of the following: • Date, time and location of the incident; • Species of marine mammal or seabird involved; • Circumstances of the incident; • Weather and sea conditions at the time; • Observed state of the marine mammal or seabird colony after the incident; and, • Direction of travel of the marine mammal after the incident, to the extent that it can be determined.	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to PC T&C No. 123, Section 4, p. 411-412 in A-24A-12 2023 NIRB Annual Report. Refer to p.44 - 57 in A-24A-15 2024 June MEWG Presentation	22-Aug-2023 (Sustainability Specialist): There have been no vessel strikes with wildlife to date and therefore no reports to DFO.

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24	123	24.a. The Proponent shall provide sufficient marine mammal observer coverage on project vessels to ensure that collisions with marine mammals and seabird colonies are observed and reported through the life of the Project.	24.a. Does Baffinland provide sufficient marine mammal observer coverage on project vessels to ensure that collisions with marine mammals and seabird colonies are observed and reported through the life of the project?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to B-22B-16 for the Shipboard Observer Training Manual, which includes protocols that will be followed during the 2023 SBO Program. Refer to p.44 - 57 in A-24A-15 2024 June MEWG Presentation Refer to slide 37 in B-22B-25A and B-22B-25B for 2022 SBO Program Summary. Refer to B-22B-25A and B-22B-25B (slides 69-70) for details on SBO program planned for 2023. Refer to PC T&C 123, Section 4, p. 411-412 in A-24A-12 2023 NIRB Annual Report. Refer to T&C 107, Section 4, p. 369-370 in A-24A-12 2023 NIRB Annual Report.	Regional Monitoring Specialist (Jan 2025): The Ship Based Observer program is run at the end of the shipping season to ensure that there are no animal collisions or entrapment. In 2024, the program was planned for but there was no freeze up and it was cancelled.
		24.b. The marine wildlife observer protocol shall include, but not be limited to, protocols for marine mammals...	24.b. Does the protocol for the marine wildlife observer include protocols for marine mammals?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to PC T&C No. 123, Section 4, p. 411-412 in A-24A-12 2023 NIRB Annual Report. Refer to p.44 - 57 in A-24A-15 2024 June MEWG Presentation Refer to Section 5.10 of B-22B-16 "Shipboard Observer Training Manual," which includes protocols that will be followed during the 2023 SBO Program. Refer to Section 3.8.4.1. of the DRAFT Marine Monitoring Plan (B-23A-9) for Shipboard Observer Program details. Refer to the 2024 Standing Instructions and General Information of Vessels Loading at Milne Inlet (A-24A-4).	Regional Monitoring Specialist (Jan 2025): Yes, the protocol for observing and recording marine mammals are included in Section 3.8.4.1 of the Draft Marine Monitoring Plan.
		24.c. seabirds...	24.c. Does the protocol for the marine wildlife observer include protocols for seabirds?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to PC T&C No. 123, Section 4, p. 411-412 in A-24A-12 2023 NIRB Annual Report. Refer to p.44 - 57 in A-24A-15 2024 June MEWG Presentation Refer to Section 5.10 of B-22B-16 "Shipboard Observer Training Manual," which includes protocols that will be followed during the 2023 SBO Program. Refer to Section 3.8.4.1. of the DRAFT Marine Monitoring Plan (B-23A-9) for Shipboard Observer Program details. Refer to the 2024 Standing Instructions and General Information of Vessels Loading at Milne Inlet (A-24A-4).	Regional Monitoring Specialist (Jan 2025): Yes, the protocol for observing and recording sea birds are included in Section 3.8.4.1 of the Draft Marine Monitoring Plan.
		24.d. and environmental conditions	24.d. Does the protocol for the marine wildlife observer include protocols for environmental conditions?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to PC T&C No. 123, Section 4, p. 411-412 in A-24A-12 2023 NIRB Annual Report. Refer to Table 5.1 in the 2024 Marine Shipping and Vessel Management Report (A-24A-4). Refer to Section 3.8.4.1. of the DRAFT Marine Monitoring Plan (B-23A-9) for Shipboard Observer Program details.	Regional Monitoring Specialist (Jan 2025): Yes, the protocol for observing and recording environmental conditions such as ice cover, sea conditions, glare, visibility, weather are included in Section 3.8.4.1 of the Draft Marine Monitoring Plan.
		24.e. and immediate reporting of significant observations to the ship masters of other vessels along the shipping route...	24.e. Does the protocol for the marine wildlife observer include protocols for immediate reporting of significant observations to the ship masters of other vessels along the shipping route?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to Table 5.1 in the 2024 Marine Shipping and Vessel Management Report (A-24A-4). Refer to Section 3.8.4.1. of the DRAFT Marine Monitoring Plan (B-23A-9) for Shipboard Observer Program details.	Regional Monitoring Specialist (Jan 2025): Yes, the protocol for observing and recording marine mammals are included in Section 3.8.4.1 of the Draft Marine Monitoring Plan.
		24.f. as part of the adaptive management program to address any items that require immediate action.	24.f. Is the protocol part of the adaptive management program that addresses any items that require immediate action?	Yes	no	No	Not Started	ESG	Environmental Monitoring Specialist	Refer to Table 5.1 in the 2024 Marine Shipping and Vessel Management Report (A-24A-4). Refer to Section 3.8.4.1. of the DRAFT Marine Monitoring Plan (B-23A-9) for Shipboard Observer Program details. Refer to Table 5.1 in B-23A-9 DRAFT Marine Monitoring Plan for Threshold, Action, Response Plan	
25	171	25.a. The Proponent shall include within its updated Terrestrial Wildlife Management and Monitoring Plan...	25.a. Has Baffinland updated its Terrestrial Wildlife Management and Monitoring plan?	Yes	No	No	Completed	Site Enviro	Environmental Superintendent	"Terrestrial Environment Mitigation and Monitoring Plan" document, "Mortality Mitigation" Section 3.3.4 (Page 53-55) (refer to B-23A-1) "Terrestrial Environment Mitigation and Monitoring Plan" document, "Mortality" Section 3.3.2.3 (Page 27) (refer to B-23A-1)	Interviewed Sustainability Specialist (as part of December 2019 report) - The plan is up to date as it includes all requirements, such as caribou deterrents.
		25.b. ...a commitment to establish deterrents along the Tote Road embankments at any areas where it is determined that caribou are utilizing the embankments or transportation corridors to facilitate movement and where such movement presents a likelihood of caribou mortality to occur?	25.b. Does the Terrestrial Wildlife Management and Monitoring plan include a commitment to establish deterrents along the Tote Road embankments at any areas where it is determined that caribou are utilizing the embankments or transportation corridors to facilitate movement and where such movement presents a likelihood of caribou mortality to occur?	Yes	No	No	Completed	Site Enviro	Environmental Superintendent	"Terrestrial Environment Mitigation and Monitoring Plan" document, "Mortality" Section 3.3.2.3 (Page 27) (refer to B-23A-1)	

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26	173	26. The Proponent shall employ best practices and meet all regulatory requirements during all ship-to-shore and other marine-based fuel transfer events.	26. Does Baffinland ensure that it employs best practices and meets all regulatory requirements during all ship-to-shore and other marine-based fuel transfer events?	Yes	No	No	Completed	Site Enviro	Environmental Superintendent	Oil Pollution Emergency Plan-Mine Inlet (OPEP) document, 'Fuel Storage Facilities and Infrastructure' section 5.2 (Page 22) & 'Tank Farm' section 9.3 (Page 47-48) (Refer to B-22B-23). Refer to p. 572-573 of the 2021 NIRB Annual Report (B-22B-26). Refer to the Oil Pollution Emergency Plan - Mine Inlet (OPEP), B-22B-23. Refer to the Spill at Sea Response Plan, B-22B-22. Refer to the Oil Pollution Prevention Plan - Mine Inlet (OPPP), B-22B-21, specifically section 8.1.2. 'Fuel Storage Facilities and Infrastructure.' "Spill at Sea Response Plan" document, 'Spill Response Resources' section 10 (Page 36) (refer to B-22B-22) Refer to the Oil Pollution Prevention Plan - Mine Inlet (OPPP), B-22A-16, specifically section 8.1.2. 'Fuel Storage Facilities and Infrastructure.'	
27	174	27 a. The Proponent and the Canadian Coast Guard are required to provide spill response equipment and...	27 a. Does Baffinland and the Canadian Coast Guard provide spill response equipment?	Yes	No	No	Completed	Site Enviro	Environmental Superintendent	"Spill at Sea Response Plan" document, 'Spill Response Resources' section 10 (Page 36) (refer to B-22B-22)	Interviewed Sustainability Specialist (as part of December 2019 report) - Baffinland has a Spill at Sea Response Plan (SSRP) and this plan details what assets at site are available for responding to spills. Any reliance on the Canadian Coast Guard would be outlined in that plan, however Baffinland has a contract with a company called OSRL (Oil Spill Response Limited) that will provide response assistance if they ever need it during the shipping season. The CCG as part of its own programming may have a cache of equipment in Pond Inlet, however if it's not mentioned in the SSRP it wouldn't be relevant.
		27 b. annual training to Nunavut communities along the shipping route to potentially improve response times in the event of a spill.	27 b. Does Baffinland and the Canadian Coast Guard provide annual training to Nunavut communities along the shipping route?	Yes	Yes	No	Not Started	ESG	Senior Manager of Environmental/Social Governance	page 613 of the 2023 Annual Report to NIRB (A-24-12)	
Total				89	89	89					
Yes				77	20	38					

Inuit Impact and Benefit Agreement (IIBA) Commitments

Inuit Impact and Benefit Agreement (IIBA) Commitments

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Date of Audit	30 Jun 24

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1	4.12 Annual IBA Implementation Report	1.a. The Company will prepare the Annual IBA Implementation Report required pursuant to Section 26.3 herein in order to summarize all reports generated in relation to the Project...	1.a. Has Baffinland prepared the Annual IBA Implementation Report required pursuant to Section 26.3 herein in order to summarize all reports generated in relation to the Project?	Yes	No	No	Completed	CSD	IBA Reporting Specialist	2023 IBA Annual Implementation Report (refer to C-24A-9)	Community Resources Lead (Formerly IBA Compliance Lead) (August 2023): 2022 IBA Annual Implementation Report was submitted to the CIA on March 31st, 2023
		1.b. Including reports by the Employment Committee and the Contracting Committee.	1.b. Does this include reports by the Employment Committee and the Contracting Committee?	Yes	No	No	Completed	CSD	IBA Reporting Specialist	2023 IBA Annual Implementation Report (refer to C-24A-9)	Interviewed IBA Reporting Specialist - Throughout the report the document describes activities that the Employment and Contracting Committees pursued in the Annual Work Plan year.
		1.c. On environmental issues...	1.c. Does this include a report on environmental issues?	Yes	No	No	Completed	CSD	IBA Reporting Specialist	2023 IBA Annual Implementation Report (refer to C-24A-9) (Section 3.7, page 32-34)	Interviewed IBA Reporting Specialist - This report is on the environmental issues as it affects the Inuit.
		1.d. Social and cultural objectives...	1.d. Does this include a report on social and cultural objectives?	Yes	No	No	Completed	CSD	IBA Reporting Specialist	2023 IBA Annual Implementation Report (refer to C-24A-9) (Section 3.1, page 26-27, Cross Cultural Recognition, and Inuit-related documents)	The Annual Report includes an overview of social and cultural objectives.
		1.e. Financial provisions and participation...	1.e. Does this include a report on financial provisions and participation?	Yes	No	No	Completed	CSD	IBA Reporting Specialist	2023 IBA Annual Implementation Report (refer to C-24A-9) (Section 2.4.3 Inuit Payroll, page 16; Section 2.6 Inuit contracting and subcontracting initiatives, page 22-24)	The Annual Report includes information on financial provisions by Baffinland and participation.
		1.f. Inuit training and employment...	1.f. Does this include a report on Inuit training and employment?	Yes	No	No	Completed	CSD	IBA Reporting Specialist	2023 IBA Annual Implementation Report (refer to C-24A-9) (Section 2.2 Training and Education Initiatives, page 6-10; Section 2.3 Additional Measures for Optimizing Inuit Employment and Training, page 10-12; Section 2.4 Minimum Employment Goal, page 12-15; Section 2.5 Inuit Employment Initiatives, page 17-21)	The Annual Report provides an overview of Inuit training conducted and achieved in the year.
		1.g. Contracts and economic benefits.	1.g. Does this include a report on contracts and economic benefits?	Yes	No	No	Completed	CSD	IBA Reporting Specialist	2023 IBA Annual Implementation Report (refer to C-24A-9) (Section 2.6 Inuit Contracting and Subcontracting Initiatives, page 22)	Interviewed IBA Reporting Specialist - Throughout the document it describes economic benefits and contract benefits provided to the Inuit.
2	9.2.2 Shipping-related Relations Between CIA and the Company	2. The Company will appoint a senior manager responsible for maritime shipping	2. Has Baffinland appointed a senior manager responsible for maritime shipping?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to p. 6 of C-24A-1 Baffinland Organizational Chart	Interviewed Sustainability Specialist - the Head of Shipping, as indicated on Baffinland's organization structure, is in charge of maritime shipping (23-Aug-2023 (Sustainability Specialist): Head of Shipping and Vice President of Sales and Logistics is responsible for managing maritime shipping.
3	9.2.4	3. The Company and CIA will establish a communications protocol to keep CIA and Inuit in the North Baffin communities and any other communities affected by Project-related maritime shipping continuously informed about maritime shipping activities related to the Mary River Project.	3. Has Baffinland and CIA established a communications protocol to keep CIA and Inuit in the North Baffin communities and any other communities affected by Project-related maritime shipping, continuously informed about maritime shipping activities related to the Mary River Project?	Yes	Yes	No	Completed	ESG	Environmental Monitoring Specialist	Refer to A-24A-13 2023 Post Shipping Season Meeting Minutes. Refer to Section 4 "Communications" in "Shipping and Marine Monitoring Summary - 2024 Season" (A-24A-16a and A-24A-16b) also copy of shipping route on page 4. Refer to A-24A-17 BM 2024 Pre-shipping season Update Refer to slides 11, 12, 34-36 in C-24A-8 2023 NRB Mitigation Workshop Presentation (ENG, RT) Refer to B-24B-11 2024 Post-shipping Season Presentation	Interviewed Sustainability Specialist - The "Communications Protocol" document is considered a live document as new methods are piloted (e.g. new as of July 2020 Baffinland has a dedicated Facebook Baffinland Shipping Page) Manager: Community Resource Services (Sept 2021) Document will continue to be updated as needed. Elements are shared as part of shipping meetings held with MHTO/Inuit and communicated through annual Shipping Season fact sheets. Manager: Community Resource Services (Feb 2022) 2021 protocol was applied throughout 2021. Sustainability Specialist (Feb 2024) - Note that the shipping route currently does not pass through the Foxe Basin or Hudson Strait and this line item is only applicable to Secondary Operations, which have not commenced at the time of this submission. With regards to the Northern operation, rolling shipping schedules were sent on a weekly basis throughout the 2023 shipping season to the MHTO and Inuit. 22h, 24h, 12h shipping notices were also sent to MTOs from the the communication of interest (COI). BM also confirms closure of the Foxe edge at the start of shipping season with MHTO and Inuit prior to starting shipping operation.
4	9.2.5	4. The Company shall provide CIA and Inuit in the North Baffin communities and in other communities affected by Project-related maritime shipping, ship tracking information to ensure Inuit have knowledge of ship positions and paths and ship traffic in general in Foxe Basin and Hudson Strait.	4. Has Baffinland provided CIA and Inuit in the North Baffin communities and in other communities affected by Project-related maritime shipping, ship tracking information to ensure Inuit have knowledge of ship positions and paths and ship traffic in general in Foxe Basin and Hudson Strait?	Not Applicable	Yes	No	Completed	ESG	Environmental Monitoring Specialist	Refer to A-24A-8 2023 NRB Mitigation Workshop Presentation (ENG, RT) Internal Communications Protocol for Shipping Activities. Specific details on communications included in Section 4 (starts on page 7 of pdf) (refer to C-24A-9). Note: the tracking of vessels available on http://www.baffinland.com/operations/shipping-and-marine/ . This includes contact information for community-based Baffinland shipping monitors in Foxe and Inuit, VHF radio contact information for personnel on the water (channel 26), 24-hour live vessel location, as well as details for the Baffinland Shipping Facebook account, where daily posts are made. Communication procedures discussed as part of 2023 and of shipping season meeting. Refer to A-24A-14 Refer to A-24A-17 BM 2024 Pre-shipping season Update Refer to B-24B-11 2024 Post-shipping presentation slides	Interviewed Sustainability Specialist - Updated to include newest webpage with live vessel tracking (included in documented evidence column) Manager: Community Resource Services (Sept 2021/Feb 2022) new updates were made to the 2020 communication protocol to better define roles and responsibilities for the 2021 shipping season. Shipping notices are updated yearly. Meeting with MHTO and Inuit provides an overview of communication methods and opportunities for feedback. Sustainability Specialist (Manager: Community Resource Services, Sept 2022) Communications are discussed annually at the end of season and pre-season shipping meetings. Powerpoint slides were shared with MHTO on July 7, 2022, as an in-person meeting could not be coordinated despite multiple attempts by BM. No comments were received from MHTO indicating any desired modifications to the current communications approach including during June 2022 MWC meeting.
	5A. The Company shall keep CIA informed of the following information regarding shipping during all phases of the Project: 5A.1 Vessels and Vessel Traffic:	5A. Has Baffinland kept CIA informed of the following information regarding shipping during all phases of the Project? The following conditions are specific to vessels and vessel traffic:	5A. Has Baffinland kept CIA informed of the following information regarding shipping during all phases of the Project? The following conditions are specific to vessels and vessel traffic:	Yes	Yes	No	Completed	ESG	Environmental Monitoring Specialist	Refer to Section 3.1 p. 37 "Site Activities Completed in 2023 of A-24A-12 2023 NRB Annual Report. Refer to PC T&Cs No. 102-107 (p. 358-369) of A-24A-12 2023 NRB Annual Report. Refer to A-24A-7a and A-24A-7b for Rolling Shipping Schedules.	
		5B. Type of Vessel(s)	5B. Type of Vessel(s)?	Yes	Yes	No	Completed	ESG	Environmental Monitoring Specialist	Refer to slide 18 of C-24B-14A and C-24B-14B. Refer to PC T&Cs No. 102-107 (p. 358-369) of A-24A-12 2023 NRB Annual Report. Refer to Section 3.1 p. 37 "Site Activities Completed in 2023 of A-24A-12 2023 NRB Annual Report. Refer to Table 2.2 Anticipated Vessel Transits in 2024 in A-24A-4 2024 Marine Shipping and Vessel Management Report. Refer to Slide p.63-75 of A-24A-15 2024 June MWC Presentation ENGLAKT Refer to A-24A-17 2024 BM Update Pre-season shipping Refer to A-24B 2024 Post Shipping Presentation	
		5C. Nature of cargo(s)	5C. Nature of cargo(s)?	Yes	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to PC T&Cs No. 102-107 (p. 358-369) of A-24A-12 2023 NRB Annual Report. Refer to Section 3.1 p. 37 "Site Activities Completed in 2023 of A-24A-12 2023 NRB Annual Report. Refer to Table 2.2 Anticipated Vessel Transits in 2024 in A-24A-4 2024 Marine Shipping and Vessel Management Report.	Baffinland confirmed in the spring who from the working group wanted the rolling ship schedule and a CIA consultant was added to the weekly schedule.
		5D. Development of the MTPM, procedure for review, updates and amendment?	5D. Development of the MTPM, procedure for review, updates and amendment?	Not Applicable	No	No	Not Started	N/A	-not started		

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5	4.3 Communication of Shipping Requirements for the Project	5.a. Standards for on-board communications and navigation equipment and procedures including ability to communicate with the MMSNet Site.	5.a. Standards for on-board communications and navigation equipment and procedures including ability to communicate with the MMSNet Site?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist / Senior Manager of Environmental Social Governance	Refer to page 13, section 2 Navigation, A-244-4 2024 Standing Instructions and General Information for Masters of Vessels Loading at Mine Inlet Port (DTM).	
		5.f. Procedures to address Vessel traffic safety, including safety of small boat traffic along the shipping route.	5.f. Procedures to address Vessel traffic safety, including safety of small boat traffic along the shipping route?	Yes	Yes	No	Completed	ESG	Environmental Monitoring Specialist / Senior Manager of Environmental Social Governance	Refer to A-244-5 "06/20201_BM_SOP_Shipping Communications Protocol" December 2023 update, "BM-PH-420-PRO-0001 (0-Internal Communications Protocol for Shipping Activities)". Specific details on communications included in Section 4 (starts on page 1) (PH) (refer to C-238-9). Refer to page 12, section Navigation, C-248-1 2024 Standing Instructions and General Information for Masters of Vessels Loading at Mine Inlet Port (DTM).	Interviewed Sustainability Specialist (as part of December 2019 report) - VHF notification provides live alerts and communication to boaters on waters regarding the location of carriers along the shipping routes, allowing them to plan their travel routes accordingly. Manager, Community Resource Services (Sept 2023) shipping monitors will again be hired in 2021 to provide live updates on incoming/outgoing vessels on VHF radio. Manager, Community Resource Services (Feb 2022) 10 shipping monitors were hired in 2021 to work from the Buffland office in order to track vessels, provide live updates on incoming/outgoing vessels on VHF radio. Feedback, etc. Sustainability Specialist/Manager, Community Resource Services (Sept 2022). Up to 10 shipping monitor positions were created in 2022 in advance of the shipping season to cover up to 10 positions. Start date was July 4, 2022. No comments were received from MHTD indicating any desired modifications to the current communications approach.
		5.g. Hydrographic charting and placement of navigational aids along the shipping route.	5.g. Hydrographic charting and placement of navigational aids along the shipping route?	Yes	Yes	No	Completed	ESG	Environmental Monitoring Specialist / Senior Manager of Environmental Social Governance	Refer to page 12, section Navigation, C-248-1 2024 Standing Instructions and General Information for Masters of Vessels Loading at Mine Inlet Port (DTM).	Sustainability Specialist/Manager, Community Resource Services (Sept 2022). Standing instructions to Masters are updated annually to incorporate the newest management and mitigation measures.
		5.h. Application of the Arctic Ice Regime Shipping System (AIRSS) to Vessels transiting?	5.h. Application of the Arctic Ice Regime Shipping System (AIRSS) to Vessels transiting?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to Sections D.1.4 (p. 86), D.1.6 (p. 86), D.1.7 (p. 86-88) in Appendix D Buffland Pre-Charter Bulk Carrier Ice Capability Assessment; C-238-1 06/20201 Shipping and Marine Wildlife Management Plan. Refer to Appendix 1 - Ice and Weather Information in C-248-1 2024 Standing Instructions to Vessel Masters	Sustainability Specialist (Feb 2022) - The Shipping and Marine Wildlife Management Plan is currently being updated and a finalized version will be released in Q1 or Q2 of 2023.
		5.i. Ballast water management procedures to be used by Vessels transiting along the shipping route.	5.i. Ballast water management procedures to be used by Vessels transiting along the shipping route?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Ballast Water Management Plan document, "Regulatory Framework" section 1.5 (Page 8) & "Ballast Water Management" section 2 page 9 (refer to C-238-17)	Sustainability Specialist (Feb 2022) - The Ballast Water Management Plan is currently being updated and a finalized version will be released in Q1 or Q2 of 2023.
		5.j. Ice classification for Vessels.	5.j. Ice classification for Vessels?	Yes	NO	No	Completed	ESG	Environmental Monitoring Specialist	Refer to Section 3.11 Charter Vessels Specifications, and Sections 3.2.5.1 (p. 36) and 3.2 (p. 37) of the C-238-1 06/20201 Shipping and Marine Wildlife Management Plan. Refer to Appendix 1 - Ice and Weather Information in A-244-4 2024 Standing Instructions to Vessel Masters	
		5.k. Identification of shipping route and process for changes to the route.	5.k. Identification of shipping route and process for changes to the route?	Yes	No	No	Completed	ESG	Senior Manager of Environmental Social Governance	See page 4 in "2020 Shipping Season and pre-2021 Shipping_0520201_ENG_20" document (refer to C-238-22A and C-238-22B) and Minutes document "A_20202021_MHTD_Chairman_Mtg_21Mar_ENG (C-238-21A)" and MUKT (C-238-23B) detailing the change in the shipping route that was made based on feedback received.	Manager, Community Resource Services (Sept 2023) Buffland regularly engages with the MHTD/Marines/CMA to share latest information on upcoming shipping season's activities and to obtain feedback on communication methods, etc. As part of 2020 meeting, a request was made to change the shipping route slightly near Bruce Head. Buffland has since implemented this slight deviation since 2020 shipping season. Sustainability Specialist/Manager, Community Resource Services (Sept 2022). No changes made in shipping route since 2020 shipping season.
		5.l. Process and procedures for public consultation and for public notification with respect to Vessel Details.	5.l. Process and procedures for public consultation and for public notification with respect to Vessel Details?	Yes	Yes	Yes	Completed	ESG	Senior Manager of Environmental Social Governance	Refer to A-244-5 "06/20201_BM_SOP_Shipping Communications Protocol" December 2023 update and "BM-PH-420-PRO-0001 (0-Internal Communications Protocol for Shipping Activities)". Specific details on communications included in Section 4 (starts on page 1) (PH) (refer to C-238-9). Refer to (A-244-4A, A-24-4B, A-24-4C and A-24-70) for examples of a 2023 Rolling Shipping Schedule. Refer to "Communications" Section, page 6, in Shipping and Marine Monitoring Summary - 2023 (C-244-3). This summary, and additional information pertaining to 2023 shipping communications can be found at: https://www.buffland.com/operation/Shipping-and-monitoring/ The above link includes contact information for community-based Buffland shipping monitors in Pond Inlet. VHF radio contact information for personnel on the water (channel 26), as well as details for the Buffland Shipping Facebook account, where daily posts are made. Details pertaining to this radio show can be found in Section 4.2 of the 2023 Marine Shipping and Vessel Management Report (refer to A-244-6). No shipping Radio Show (refer to C-248-2)	Manager, Community Resource Services (Sept 2023) Buffland regularly engages with the MHTD/Marines/CMA to share latest information on upcoming shipping season's activities and to obtain feedback on communication methods, seasonal activities, etc. As part of the May 28, 2023 meeting, Buffland presented its proposed approach to start of ice-calling (modified approach from 2020) by proposing to break to only once there was a continuing path of ice, rather than only waiting for confirmation that there is no more landfast ice and free edge closing. By the time the shipping season began in late July 2021, due to concerns voiced by community, Buffland agreed to avoid ice-calling entirely at the start of the season, and thus would wait until ice concentrations were no greater than 3/10ths along the shipping route. Manager, Community Resource Services (Feb 2022) Buffland did not engage in any ice-calling at the start or end of the shipping season using an icebreaker. Sustainability Specialist/Manager, Community Resource Services (Sept 2022). Roll schedules sent in advance of start of season and throughout season. Also regularly through Rolling Shipping Schedules including a tentative schedule outlining estimated times of birth and estimated times of departure for each proposed vessel. All vessel locations, and additional information pertaining to 2023 shipping communications can be found at: https://www.buffland.com/operation/Shipping-and-monitoring/ The above link includes contact information for community-based Buffland shipping monitors in Pond Inlet. VHF radio contact information for personnel on the water (channel 26), as well as details for the Buffland Shipping Facebook account, where daily posts are made. A radio show was also held on July 13th, 2023 in Pond Inlet to provide information to community on past and upcoming shipping seasons and to obtain feedback. A radio show was hosted to provide information to community on past and upcoming shipping season and answer questions and obtain feedback 2024 updates. S. Manager, ESG, Buffland has obtained it's communication by incorporating feedback from the communities. The Shipping Monitors in Pond Inlet provide feedback updates and VHF announcements each day. The supporting evidence is consistent with our past audit and the evidence provided for 2024 falls outside of the audit period but proves that Buffland is compliant with this question. Throughout 2024, we have maintained consistent communication as indicated in Pre-season updates (from 2024 Part A) and Post shipping season presentation deck. Facebook has remained the preferred channel of communication.
		5.m. Vessel requirements for pollution control, including bilge discharges, sewage and garbage.	5.m. Vessel requirements for pollution control, including bilge discharges, sewage and garbage?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist / Senior Manager of Environmental Social Governance	Refer to Appendix 1 of the 2022 HMR Marine Shipping and Vessel Management Report for the 2022 Shipping and Marine Wildlife Management Plan (C-238-14). Refer to Section 6.3 p. 78-79, "Onboard Waste Management" of Appendix 1 in C-238-14.	
		5.n. Requirements with respect to Oil Pollution Emergency Plans (OPEP) under the Canada Shipping Act	5.n. Requirements with respect to Oil Pollution Emergency Plans (OPEP) under the Canada Shipping Act?	Yes	No	No	Completed	ESG	Environmental Superintendent	"Oil Pollution Emergency Plan Mine Inlet (OPEP) document, Appendix 10 - Emergency Response Regulations / Environmental Response Standards - Concordance Table (page 140) (refer to C-244-2)	Interviewed Sustainability Specialist - This OPEP document was updated May 2020. Environmental Superintendent (Feb 2022) The OPEP document was updated in May 2022. Environmental Superintendent (August 2023) The OPEP was updated in May 2021. Environmental Superintendent (August 2024) The OPEP was updated in May 2024.

Inuit Impact and Benefit Agreement (IIBA) Commitments

Name of Auditor: BSO Canada LLP
Date of Audit: 30 Jun 24

Completion Rate:	
Total # of audit questions with evidence provided supporting completion of the audit question	49
Percentage of applicable audit questions with evidence provided supporting completion of the audit question	98%

Concern #	Amended IBA Article Reference #	Commitment Statement	Audit Question	Evidence Provided (Yes / No / N/A)	Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Accountable Manager	Responsible Position	Documented Evidence	Interview Notes
5 (cont'd)	6.3 Communication of Shipping Requirements for the Project (part 6)	5.a. Identification of locations for emergency anchorages	5.a. Identification of locations for emergency anchorages?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to p. 14 of A.24A.4 for anchorage locations; 2024 Standing Instructions and General Information for Masters of Vessels Loading at Mine Inlet Port (DITM); Refer to Section 3 "ANCHORING AND DRIFTING AREAS" Table 3.1 and Figure 3.1, p. 8 - 11 in A.24A.4 2024 Marine Shipping and Local Management Report	Interviewed Sustainability Specialist (as part of December 2019 report) - Since emergency anchorage only affects hunters (i.e. communities), we have liaised directly with the impacted parties, whom the IBA is set up to represent.
		5.b. Procedures for dealing with anticipated unusual vessel traffic, including towing arrays and	5.b. Procedures for dealing with anticipated unusual vessel traffic, including towing arrays?	Not Applicable	No	No	Not Started	ESG	Environmental Monitoring Specialist	N/A	Sustainability Specialist (Feb 2022) - There have been no anticipated towing arrays at the Project to date.
		5.c. Procedures for shipping requirements for any construction after commencement of Commercial Production	5.c. Procedures for shipping requirements for any construction after commencement of Commercial Production?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to A.24A.4 2024 Standing Instructions and General Information for Masters of Vessels Loading at Mine Inlet Port (DITM); Refer to A.24A.5 "06/20/2021_BSM_SOP_Shipping_Communications_Protocol" December 2023 update and "BM-PH1-020-PRO-001 (Internal Communications Protocol for Shipping Activities)" specific details on communications included in Section 4 (part's on page of pdf) (refer to C.28-9)	Interviewed Sustainability Specialist (as part of June 2019 report) - There are no separate requirements for Construction material shipping outside of the defined "construction period". These vessels still have to follow all operational requirements (for example, speed limit of 9 knots etc.). Sustainability specialist/Manager, Community Resource Services (Sept 2022) - Vessel schedules sent in advance of start of season and throughout season. Also regularly through Rolling Shipping Schedule including a tentative schedule outlining estimated times at berth and estimated times of departure for each proposed vessel. All vessel locations, and additional information pertaining to 2022 shipping communications can be found at: https://news.baffinland.com/corporate/shipping-and-monitoring/ The above link includes contact information for community based Baffinland shipping monitors in Pond Inlet. VHF radio contact information for personnel on the water (channel 20), as well as details for the Baffinland Shipping Facebook account, where daily posts are made.
6	9.4 Shipping Monitoring	6.a. The Company in consultation with QIA will facilitate and pay for training for Inuit ship monitors.	6.a. Has Baffinland, in consultation with QIA, facilitated and paid for training for Inuit ship monitors?	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist/ Senior Manager of Environmental Social Governance	"Ship-Based Observer - Training Manual" document, which is Appendix A' (Page 101) of the "2023 Ship-Based Observer Program Report" document, which describes the training process (C.24-4) Refer to the SBO Training Manual (C.28-10), which was used for training Inuit shipboard monitors in the fall of 2023 Refer to C.24B-8.57CN-PS1 Training payment	Regional Monitoring Specialist (Feb 2022) In 2024, Ship monitors had their certification updated, one monitor was trained in STCW Personal Survival Techniques (PST) Interviewed Sustainability Specialist - Costs for training are exclusively paid for by Baffinland. No program in 2020 due to COVID-19 pandemic onboarding restrictions. Manager, Community Resource Services(2022). No program in 2021 due to COVID-19 pandemic boarding restrictions Sustainability specialist/Manager, Community Resource Services (Sept 2022): Training and hiring of Inuit shipboard monitors required for Fall 2022.
		6.b. and to the extent such individuals are available for employment will hire trained Inuit to act as monitors.	6.b. If such individuals are available for employment does Baffinland hire trained Inuit to act as monitors?	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist/ Senior Manager of Environmental Social Governance	"Ship-Based Observer Program - Training Manual" document, which is Appendix A' (Page 101) of the "2023 Ship-Based Observer Program Report" (C.24A-4) Refer to A.24B-1 2024 Post Shipping Season Slides for hiring and training of Inuit shipping monitors.	Interviewed Sustainability Specialist - Baffinland employed the Inuit ship monitors subsequent to the completion of the course. No program in 2020 due to COVID-19 pandemic onboarding restrictions. Manager, Community Resource Services(2022). No program in 2021 due to COVID-19 pandemic boarding restrictions Sustainability specialist/Manager, Community Resource Services (Sept 2022): Training and hiring of Inuit shipboard monitors required for Fall 2022. Baffinland continues to train and hire Inuit shipping monitors.
		6.c. Inuit monitors on behalf of the Company and QIA will act as monitors on project related voyages that pose a significant environmental risk as agreed to by the Parties.	6.c. Have Inuit monitors, on behalf of Baffinland and QIA, acted as monitors on project related voyages that pose a significant environmental risk as agreed to by the Parties?	Not Applicable	No	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to the SBO Training Manual, Appendix 1 (p. 101) in 2023 Ship-based Observer Program Report (C.24A-4) Refer to C.28-19 SBO Program Methods for additional information pertaining to the SBO program, which was last completed in 2019 and will be reintroduced in 2025.	Interviewed Sustainability Specialist - The individuals are located on vessels such as ice breakers which would pose a higher environmental risk. Also, the individuals are monitoring at the beginning and the end of the shipping season, which represent to periods which are environmentally riskier and this timing was agreed to by QIA. The program was repeated in 2019 and was reported on in the 2019 annual monitoring report, which was issued in May 2020. BSM completed last March 2022. Documented that this is changed to N/A as this was not possible due to boarding restrictions related to COVID-19 pandemic. BSM was in compliance prior to 2020. Note that in 2021, Baffinland did not conduct which is typically this period over which shipping monitors would be placed on vessel during a period with higher significant environmental risk. Sustainability specialist/Manager, Community Resource Services (Sept 2022): Baffinland has hired two Inuit shipboard monitors for the 2022 SBO program.
		6.c. In the event Inuit monitors are unavailable and if required as a continuing condition of the NRS "Project Certificate", the Company will still ensure that ship monitors are present on voyages that pose a significant environmental risk.	6.c. In the event Inuit monitors are unavailable and if required as a continuing condition of the NRS "Project Certificate", has Baffinland ensured that ship monitors are present on voyages that pose a significant environmental risk?	Not Applicable	No	Yes	Completed	ESG	Environmental Monitoring Specialist/ Senior Manager of Environmental Social Governance	Ship-based observers could not board icebreaker as done previously in 2018-2019. As an alternative, incidental marine mammal monitoring program was established in collaboration with MNON in 2020 and has been carried out annually since. (refer to C.28-20) Refer to the SBO Training Manual Appendix 1 in C.24A-4 2023 Ship Based Observer Program Report Refer to C.28-19 SBO Program Methods for additional information pertaining to the SBO program, which was last completed in 2019 and will be reintroduced in 2025.	Interviewed Sustainability Specialist - The individuals are located on vessels such as ice breakers which would pose a higher environmental risk. Also, the individuals are monitoring at the beginning and the end of the shipping season, which represent to periods which are environmentally riskier and this timing was agreed to by QIA. The program was repeated in 2019 and was reported on in the 2019 annual monitoring report, which was issued in May 2020. Manager, Community Resource Services(Sept 2021/Feb 2022): MNON program was initiated in 2020 and is continuing into 2021. Senior Manager ESG - 2025: The SBO program was planned for voyages that pose environmental risk particularly at the end of shipping season when ice is present. However, due to unseasonably warm water, ice did not form in the IBA by the end of the shipping season and ice breakers were not required for escort during this time. Given that the wildlife monitors are situated on the ice breakers and not the one carriers. As a result, we did not send wildlife observers on the ice breakers because they were not needed.
		6.d. The intent of establishing monitoring stations under Subsection 13.3.2 will be to complement or potentially substitute for the need for ship monitors. The Joint Executive Committee will periodically assess the effectiveness of ship monitoring and other monitoring methods as the Project evolves.	6.d. Has the Joint Executive Committee periodically assessed the effectiveness of ship monitoring and other monitoring methods as the Project evolves?	Yes	Yes	Yes	Completed	CSD	IIBA Reporting Specialist	C.23a-16, IBA Annual Report 2022 PDF pg. 15 Section 2.3 Additional Measures for Optimizing Inuit Employment and Training Refer to C.24B-11.4C: Action Items, July 21, 2024 C.24B-12.2/2/11-12A-IBA-ECMinutesJuly21-ENG Draft v1	Interviewed IBA Specialist March 2025. There has been no discussions for shipping related monitoring activities since July 22.
7	9.4.4	7.a. Shipping monitors shall prepare a written report of their activities after each voyage and summarize the year's activity.	7.a. Did shipping monitors prepare a written report of their activities after each voyage and summarize the year's activity?	Yes	No	No	Completed	ESG	Senior Manager of Environmental Social Governance	"2023 Ship-Based Observer Program" Report (Executive Summary) (Page 9) (refer to C.24A-4) Shipping monitor daily reports to address any deviations A.24B - 9 - Shipping Monitor Tracking - 2024 Oct	Interviewed Sustainability Specialist - The shipboard observer program was repeated in 2019 and was reported on in the 2019 annual monitoring report, which was issued in May 2020. Therefore, the 2019 program report is the most recent and relevant evidence as of December 31, 2021. Senior Manager ESG - 2025: This is pertaining to the shipping monitor reports and not SBO. The SBO is related to include the protocols.
		7.b. The reports shall be delivered to the Joint Executive Committee and included in the Annual IBA Implementation Report	7.b. Were the reports delivered to the Joint Executive Committee and included in the Annual IBA Implementation Report?	No	No	No	Completed	ESG	Senior Manager of Environmental Social Governance	"2019 Ship-Based Observer Program" Report (July 2020 version), Executive Summary (Page 6) (refer to C.28-2)	Interviewed Sustainability Specialist - The shipping and environmental monitors are not Baffinland employees and do not report directly to Baffinland, which results in Baffinland being at the mercy of their submission to be able to include in Baffinland's annual IBA reporting and to the EC. Baffinland received the shipping and environmental monitors' report in May 2022, which was part the annual IBA and EC report issued each of March 31, 2020. Since the timing of the report is out of Baffinland's control, the Audit Question has been determined to be N/A. Program not operating in 2021 due to Covid restrictions.

Inuit Impact and Benefit Agreement (IIBA) Commitments

Name of Auditor	BDO Canada LLP
Date of Audit	30 Jun 24

Completion Rate:	
Total # of audit questions with evidence provided supporting completion of the audit question	49
Percentage of applicable audit questions with evidence provided supporting completion of the audit question	98%

Concern #	Amended IIBA Article Reference #	Commitment Statement	Audit Question	Evidence Provided (Yes / No / NA)	Documented Evidence Change? (Yes or No)	Interview Notes Changed? (Yes or No)	Status	Accountable Manager	Responsible Position	Documented Evidence	Interview Notes
8	9.4	8. The Company will ensure that all safety, spill response and operational plans and mitigation measures are adequate, request and protect the relationship of Inuit to the sea, sea ice and marine resources, including the rights of Inuit pursuant to Subsection 5.7.16 and subject to limitations on such rights set out in the NECA, including Section 5.7.17, 5.7.18 and 5.7.25 when considering the operational needs of the Project.	8. Has Baffinland ensured that all safety, spill response and operational plans and mitigation measures are adequate, request and protect the relationship of Inuit to the sea, sea ice and marine resources, including the rights of Inuit pursuant to Subsection 5.7.16 and subject to limitations on such rights set out in the NECA, including Section 5.7.17, 5.7.18 and 5.7.25 when considering the operational needs of the Project?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to "Sill at Sea Response Plan" document, Environmental Information Appendix 4 (Page 138) (refer to C-238-8) Refer to Section 3.4 Emergency Management and Response in C-238.3 DRAFT Shipping and Marine Wildlife Management Plan	POW IBA Compliance Load (March 2022): Baffinland's Shipping and Marine Wildlife Management Plan (C-4) provides details on all of the various types of information that were considered in order to incorporate safety, spill response operational plans and mitigation measures. Inuit are able to travel safely and pursue harvesting activities throughout the shipping season as Baffinland has put in place measures to avoid and modify its activities in consideration of ecological factors and Inuit activities (e.g., shipping go-zones based on hauling areas and ecological significance as identified by Inuit). Traditional knowledge of all-ice allows Baffinland navigators to avoid from Milne Port. Section 3 Emergency Management and Response (C-4) discusses spill prevention and management. Sections 3 and 5 describe shipping mitigation and management measures related to various commitments and ecological, land use and harvesting considerations. Specifically, Section 5.3 describes how the various community, environmental and ecological factors were taken into consideration. As a whole, Section 6 describes all of the various procedures put in place to describe how Baffinland shares information about its activities so that Inuit may participate in harvesting activities and travel safely (Section 6.5.1). The hiring of shipping monitors in the community allows for any issues that may be in conflict with harvesting activities to be reported by the shipping monitors. In addition, the use of vessel tracking software tool to monitor vessel compliance (e.g., adherence to specific vessel speeds, shipping routes, avoidance of no-go zones) aims to ensure Inuit are able to travel safely in the area and harvest.
9	14.3 Annual Project Review Forum	9. The Parties agree to hold an Annual Project Review Forum (referred to in this Article 14 as the "Forum") at which OIA and the Company shall discuss Project related issues directly with members from impacted communities.	9. Did the Parties hold an Annual Project Review Forum (referred to in this Article 14 as the "Forum") at which OIA and Baffinland discussed Project related issues directly with members from impacted communities?	Yes	No	No	Completed	CEO	IIBA Reporting Specialist	2023 APRF Report Final Inuitat English (refer to C-244-10)	IIBA Compliance Load (March 2022): APRF has not been held due to COVID restrictions on gatherings in the community for 2020 and 2021. Plans to hold in 2022. Most recent document would be 2019 IIBA Compliance Load (February 2022): The APRF was not held in 2022. Plans to hold the APRF were interrupted by the miners uncertainty. Plans are to hold APRF in 2023. Community Resources Load (Formerly IBA Compliance Load) (August 2023) The APRF was held from May 9th - May 11th, 2023. The report is still being developed at the time of this audit, so a link to the report releases is provided.
10	15.2 Mitigation and Monitoring	10. The Company will implement all mitigation measures or monitoring provisions, including those identified in the Final ES and required by NBB under the NBB Project Certificate(s).	10a. Has Baffinland implemented all mitigation measures or monitoring provisions, including those identified in the Final ES and required by NBB under the NBB Project Certificate(s)?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to slides 102-103 in C-238.4 - 2023 NBB Mitigation Workshop Presentation Refer to Section 4.3 (p. 47), Section 4.4 (p. 49-50), Section 4.5 (p. 50-54), Section 4.6 (p. 55-53) of A-244.12 2023 NBB Annual Report	Interviewed IIBA Reporting Specialist - Baffinland is only partially compliant as not all mitigation measures have been implemented, therefore evidence provided does not support the completion of the Audit Question.
		10.b. and other mitigation measures and monitoring provisions developed by the Company from time to time through the Environmental, Health and Safety Management System ("EHS System").	10b. Have other mitigation measures and monitoring provisions developed by Baffinland from time to time through the Environmental, Health and Safety Management System ("EHS System")?	Yes	Yes	No	Completed	ESG	Environmental Monitoring Specialist	Refer to the 2023 NBB Annual Report (A-244-12), Section 4.6.1 (p. 55-74), Section 4.6.2 (p. 74-99), Section 4.6.4 (p. 103-109), Section 4.6.5 (p. 110-144), Section 4.6.6 (p. 146-168), Section 4.6.7 (p. 169-188), Section 4.6.8 (p. 189-245), Section 4.6.9 (p. 246-250), Section 4.6.10 (p. 250-313), Section 4.6.11 (p. 313-423), Section 4.7 (p. 425-444), Section 4.7.2 (p. 444-444), Section 4.7.3 (p. 464-476), Section 4.7.4 (p. 478-499), Section 4.7.5 (p. 499-514), Section 4.7.6 (p. 514-523), Section 4.7.7 (p. 523-537), Section 4.7.8 (p. 537-546), Section 4.7.9 (p. 546-546), Section 4.8.1 (p. 547-561), Section 4.8.2 (p. 561).	
		10.c.1. Does the project monitoring programme evaluate the accuracy of the project impact predictions?	10.c.1. Does the project monitoring programme evaluate the accuracy of the project impact predictions?	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to Slides 4.8 in C-248.3 2024 Marine Environment Monitoring Programs Presentation Refer to Slide 38 in C-244.4 2023 Terrestrial Environment Monitoring Programs Presentation Refer to the 2023 NBB Annual Report (A-244-12) Section 4.6.1 (p. 55-74), Section 4.6.2 (p. 74-99), Section 4.6.4 (p. 103-109), Section 4.6.5 (p. 110-144), Section 4.6.6 (p. 146-168), Section 4.6.7 (p. 169-188), Section 4.6.8 (p. 189-245), Section 4.6.9 (p. 246-250), Section 4.6.10 (p. 250-313), Section 4.6.11 (p. 313-423), Section 4.7 (p. 425-444), Section 4.7.2 (p. 444-444), Section 4.7.3 (p. 464-476), Section 4.7.4 (p. 478-499), Section 4.7.5 (p. 499-514), Section 4.7.6 (p. 514-523), Section 4.7.7 (p. 523-537), Section 4.7.8 (p. 537-546), Section 4.7.9 (p. 546-546), Section 4.8.1 (p. 547-561), Section 4.8.2 (p. 561).	Regional Monitoring Specialist (Mar 2025) One of the key aims of Baffinland's monitoring programs is to evaluate the Final Environmental Impact Statement (FEIS) predictions before the project began.
		10.c.2. Does the project monitoring programme evaluate the significance determinations, including assessment of the efficacy of all mitigation measures?	10.c.2. Does the project monitoring programme evaluate the significance determinations, including assessment of the efficacy of all mitigation measures?	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to Slides 32-49 in C-248.3 2024 Marine Environment Monitoring Programs Presentation Refer to the 2023 NBB Annual Report (A-244-12), Section 4.6.1 (p. 55-74), Section 4.6.2 (p. 74-99), Section 4.6.4 (p. 103-109), Section 4.6.5 (p. 110-144), Section 4.6.6 (p. 146-168), Section 4.6.7 (p. 169-188), Section 4.6.8 (p. 189-245), Section 4.6.9 (p. 246-250), Section 4.6.10 (p. 250-313), Section 4.6.11 (p. 313-423), Section 4.7 (p. 425-444), Section 4.7.2 (p. 444-444), Section 4.7.3 (p. 464-476), Section 4.7.4 (p. 478-499), Section 4.7.5 (p. 499-514), Section 4.7.6 (p. 514-523), Section 4.7.7 (p. 523-537), Section 4.7.8 (p. 537-546), Section 4.7.9 (p. 546-546), Section 4.8.1 (p. 547-561), Section 4.8.2 (p. 561).	Regional Monitoring Specialist (Mar 2025) During the presentation of 2024 Marine Programs (C-248.3) some of the discussions with members included the efficacy of mitigation and sampling methods.
11	15.3.4 EHS System	As part of the EHS System the Company agrees to undertake a series of monitoring programs on a continuous basis for the following purposes: 11.a. To supplement the baseline data.	As part of the Baffinland EHS System, is there a series of monitoring programs on a continuous basis for the following purposes: 11.a. To supplement the baseline data?	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to C-248.3 2024 Marine Environment Monitoring Programs Presentation C-244.4 Terrestrial Environment Monitoring Programs Presentation Refer to Section 3 of C-238.13 DRAFT Terrestrial Environment Mitigation and Monitoring Plan Refer to the 2023 NBB Annual Report (C-238-1) Section 4.6 (p. 51-54), Section 4.6.2 (p. 75-75), Section 4.6.4 (p. 103-104), Section 4.6.5 (p. 110-121), Section 4.6.6 (p. 144-146), Section 4.6.7 (p. 169-189), Section 4.6.8 (p. 189-193), Section 4.6.9 (p. 249-250), Section 4.6.10 (p. 264-268), Section 4.6.11 (p. 336-339), Section 4.7 (p. 463-463), Section 4.7.2 (p. 466), Section 4.7.3 (p. 491-492), Section 4.7.4 (p. 505), Section 4.7.5 (p. 505-522), Section 4.7.6 (p. 524-524), Section 4.7.7 (p. 544-546), Section 4.7.8 (p. 561-562), Section 4.7.9 (p. 564), Section 4.8.1 (p. 570), Section 4.8.2 (p. 585).	Regional Monitoring Specialist (Mar 2025) Baffinland monitoring programs (Aquatic, Marine and Terrestrial) are done continuously to update baseline data. In addition at the TDWG members propose recommendations for baseline studies.
		11.b. To comply with environmental, regulatory and contractual requirements.	11.b. To comply with environmental, regulatory and contractual requirements?	Yes	Yes	No	Completed	ESG	Environmental Monitoring Specialist	Refer to the 2023 NBB Annual Report (A-244-12), Section 4.6 (p. 51-54), Section 4.6.2 (p. 75-75), Section 4.6.4 (p. 103-104), Section 4.6.5 (p. 110-121), Section 4.6.6 (p. 144-146), Section 4.6.7 (p. 169-189), Section 4.6.8 (p. 189-193), Section 4.6.9 (p. 249-250), Section 4.6.10 (p. 264-268), Section 4.6.11 (p. 336-339), Section 4.7 (p. 463-463), Section 4.7.2 (p. 466), Section 4.7.3 (p. 491-492), Section 4.7.4 (p. 505), Section 4.7.5 (p. 505-522), Section 4.7.6 (p. 524-524), Section 4.7.7 (p. 544-546), Section 4.7.8 (p. 561-562), Section 4.7.9 (p. 564), Section 4.8.1 (p. 570), Section 4.8.2 (p. 585).	
		11.c. To validate the predictions relating to the potential effects.	11.c. To validate the predictions relating to the potential effects?	Yes	Yes	No	Completed	ESG	Environmental Monitoring Specialist	Refer to C-248.3 2024 Marine Environment Monitoring Programs Presentation Refer to Slide 38 in C-244.4 Terrestrial Environment Monitoring Programs Presentation Refer to the 2023 NBB Annual Report (A-244-12) Section 4.6 (p. 51-54), Section 4.6.2 (p. 75-75), Section 4.6.4 (p. 103-104), Section 4.6.5 (p. 110-121), Section 4.6.6 (p. 144-146), Section 4.6.7 (p. 169-189), Section 4.6.8 (p. 189-193), Section 4.6.9 (p. 249-250), Section 4.6.10 (p. 264-268), Section 4.6.11 (p. 336-339), Section 4.7 (p. 463-463), Section 4.7.2 (p. 466), Section 4.7.3 (p. 491-492), Section 4.7.4 (p. 505), Section 4.7.5 (p. 505-522), Section 4.7.6 (p. 524-524), Section 4.7.7 (p. 544-546), Section 4.7.8 (p. 561-562), Section 4.7.9 (p. 564), Section 4.8.1 (p. 570), Section 4.8.2 (p. 585).	

Inuit Impact and Benefit Agreement (IIBA) Commitments

Name of Auditor	BDO Canada LLP
Date of Audit	30 Jun 24

Completion Rate:	
Total # of audit questions with evidence provided supporting completion of the audit question	49
Percentage of applicable audit questions with evidence provided supporting completion of the audit question	98%

Concern #	Amended IBA Article Reference #	Commitment Statement	Audit Question	Evidence Provided (Yes / No / N/A)	Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Accountable Manager	Responsible Position	Documented Evidence	Interview Notes
	11.d.	To improve management plans.	11.d. To improve management plans.	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to Section 6 of C-23A, 14 DRAFT Terrestrial Environment Mitigation and Monitoring Plan Refer to Section 6 of C-23A, 13 DRAFT Marine Monitoring Plan Refer to the 2023 NRB Annual Report (A-24A-12), Section 4.1 (p. 35-74), Section 4.2 (p. 74-90), Section 4.4 (p. 103-119), Section 4.5 (p. 119-144), Section 4.6 (p. 146-148), Section 4.7 (p. 146-148), Section 4.8 (p. 188-244), Section 4.9 (p. 244-270), Section 4.10 (p. 270-331), Section 4.11 (p. 331-425), Section 4.7 (p. 425-441), Section 4.7.2 (p. 444-446), Section 4.7.3 (p. 464-476), Section 4.7.4 (p. 478-499), Section 4.7.5 (p. 499-514), Section 4.7 (p. 514-523), Section 4.7.7 (p. 523-537), Section 4.7.8 (p. 537-540), Section 4.7.9 (p. 540-544), Section 4.8.1 (p. 547-561), Section 4.8.2 (p. 561).	Regional Monitoring Specialist (Mar 2023) Baffinland has started developing adaptive mechanism for carbon interactions with the project. Refer to C-24E.4. This memo was presented to the TEWG in October, 2024 and January 2025 for the review of the definition of carbon interactions with the project. Once this definition has been agreed and finalized by the TEWG, it will be used to update the Terrestrial Environment Monitoring and Mitigation Plan (TEMMIP).
		To support and refine adaptive management processes and procedures; and	11.e. To support and refine adaptive management processes and procedures?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to C-23A-15 DRAFT Adaptive Management Plan Refer to slides 32-49 in C-23A-8-2023 NRB Marine Mitigation Workshop Presentation	
		To address new or additional issues identified and agreed to by the Parties from time to time.	11.f. To address new or additional issues identified and agreed to by the Parties from time to time?	Yes	Yes	No	Completed	ESG	Environmental Monitoring Specialist	Refer to C-24B-7 MEWIG Action Tracker and C-24B-4 TEWG Action Tracker Refer to the 2023 NRB Annual Report (A-24A-12), Section 4.1 (p. 35-74), Section 4.2 (p. 74-90), Section 4.4 (p. 103-119), Section 4.5 (p. 119-144), Section 4.6 (p. 146-148), Section 4.7 (p. 146-148), Section 4.8 (p. 188-244), Section 4.9 (p. 244-270), Section 4.10 (p. 270-331), Section 4.11 (p. 331-425), Section 4.7 (p. 425-441), Section 4.7.2 (p. 444-446), Section 4.7.3 (p. 464-476), Section 4.7.4 (p. 478-499), Section 4.7.5 (p. 499-514), Section 4.7 (p. 514-523), Section 4.7.7 (p. 523-537), Section 4.7.8 (p. 537-540), Section 4.7.9 (p. 540-544), Section 4.8.1 (p. 547-561), Section 4.8.2 (p. 561).	24-Aug-2023 (Sustainability Specialist): There are many ways for the public and regulators to submit feedback on Baffinland's operations and monitoring programs, including community engagement events/narratives, as well as commenting on all documentation posted to the NRB Public Registry. Additionally, there are Working Groups, including the Marine (MEWIG) and Terrestrial Environment Working Group (TEWG). All requests submitted through these Working Groups are tracked by Baffinland and some updates are provided at this subsequent meeting. Additionally, Baffinland is working to revise the Terms of Reference for these WGs, which includes a formal recommendation process for members.
12	15.a. 2 Final ES Impact Projections – Different or Greater Significance of Fossil Fuel Impacts	If the collection and use of Inuit Qaujimiqtuq or the results of any monitoring programs, including the EIS System, reasonably demonstrates that the significance of residual adverse impacts imposed by the Final ES Impact Projections are determined to be significant and materially greater than described in the Final ES.	12.a. Has the collection and use of Inuit Qaujimiqtuq or the results of any monitoring programs, including the EIS System, reasonably demonstrated that the significance of residual adverse impacts imposed by the Final ES Impact Projections are determined to be significant and materially greater than described in the Final ES?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to the 2023 NRB Annual Report (A-24A-12), Section 4.1 (p. 35-74), Section 4.2 (p. 74-90), Section 4.4 (p. 103-119), Section 4.5 (p. 119-144), Section 4.6 (p. 146-148), Section 4.7 (p. 146-148), Section 4.8 (p. 188-244), Section 4.9 (p. 244-270), Section 4.10 (p. 270-331), Section 4.11 (p. 331-425), Section 4.7 (p. 425-441), Section 4.7.2 (p. 444-446), Section 4.7.3 (p. 464-476), Section 4.7.4 (p. 478-499), Section 4.7.5 (p. 499-514), Section 4.7 (p. 514-523), Section 4.7.7 (p. 523-537), Section 4.7.8 (p. 537-540), Section 4.7.9 (p. 540-544), Section 4.8.1 (p. 547-561), Section 4.8.2 (p. 561).	
		If the Company shall carry out appropriate measures as contained in the EIS System.	12.b. If so, did Baffinland carry out appropriate measures as contained in the EIS System?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to the 2023 NRB Annual Report (A-24A-12), Section 4.1 (p. 35-74), Section 4.2 (p. 74-90), Section 4.4 (p. 103-119), Section 4.5 (p. 119-144), Section 4.6 (p. 146-148), Section 4.7 (p. 146-148), Section 4.8 (p. 188-244), Section 4.9 (p. 244-270), Section 4.10 (p. 270-331), Section 4.11 (p. 331-425), Section 4.7 (p. 425-441), Section 4.7.2 (p. 444-446), Section 4.7.3 (p. 464-476), Section 4.7.4 (p. 478-499), Section 4.7.5 (p. 499-514), Section 4.7 (p. 514-523), Section 4.7.7 (p. 523-537), Section 4.7.8 (p. 537-540), Section 4.7.9 (p. 540-544), Section 4.8.1 (p. 547-561), Section 4.8.2 (p. 561).	
		These measures will be reviewed by the Forum pursuant to Article 14 and by the Joint Executive Committee pursuant to Section 14.14.	12.c. Have these measures been reviewed by the Forum pursuant to Article 14 and by the Joint Executive Committee pursuant to Section 14.14?	Yes	Yes	No	Not Started	CSD	IBA Reporting Specialist	2023 ARPF Report Final Qualified Engineer (refer to C-24A-15) 2023 Baffinland ARPF Presentation (Refer to C-24A-11) 2024 Baffinland ARPF Agenda C-24B-10 Annual Project Forum Agenda	Interviewed IBA Reporting Specialist - In 2021, the Annual Project Review Forum has not yet occurred due to COVID-19 travel restrictions put in place by the Government. Reviewed at the forum in 2019. ARPF has yet to be held in 2022. IBA Compliance Lead (February 2023): The ARPF was not held in 2022. Plans to hold the ARPF were interrupted by the mine's uncertainty. Plans are to hold ARPF in 2023. Community Resources Lead (Formerly IBA Compliance Lead) (August 2023): The ARPF was held from May 9th - May 11th, 2023. The report is still being developed at the time of this audit, so a link to the media releases is provided.
13	15.b Environmental Monitor	The Company shall pay QIA the cost to fund a full-time presence on site for Environmental Monitors to be appointed and employed solely by QIA.	13.a. Has Baffinland paid QIA the cost to fund a full-time presence on site for Environmental Monitors to be appointed and employed solely by QIA?	Yes	No	No	Completed	CSD	IBA Reporting Specialist	"Environmental Monitor Operating Procedures Manual" document, "Description of the IBA & Environmental Monitor Commitment" refer to C-22B-2B, Page 6	Interviewed IBA Reporting Specialist (as part of June 2019 report): Baffinland funds QIA's costs to hire and employ staff (Environmental Monitor) working on site.
		Who shall be in attendance on site at the Project.	13.b. Are the Environmental Monitors in attendance on site at the Project provide written reports to QIA and Baffinland?	Not Applicable	No	No	Completed	CSD	IBA Reporting Specialist	N/A	Interviewed IBA Reporting Specialist - These employees are employed by QIA and not Baffinland, therefore they report directly to QIA and Baffinland does not have reports available for this audit.
		and provide written reports to QIA and the Company.	13.c. Do they provide written reports to QIA and Baffinland?	Not Applicable	No	No	Completed	CSD	IBA Reporting Specialist	N/A	Interviewed IBA Reporting Specialist - These employees are employed by QIA and not Baffinland, therefore they report directly to QIA and Baffinland does not have reports available for this audit.

Inuit Impact and Benefit Agreement (IIBA) Commitments

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Concern #	Amended IBA Article Reference #	Commitment Statement	Audit Question	Evidence Provided (Yes / No / N/A)	Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Accountable Manager	Responsible Position	Documented Evidence	Interview Notes
13 (cont'd)	15.8 Environmental Monitor (cont'd)	13.d. The Environmental Monitors shall attend the Project site with a copy of all environmental approval conditions, including any applicable NRB project certificate conditions.	13.d. Have the Environmental Monitors attended the Project site with a copy of all environmental approval conditions, including any applicable NRB project certificate conditions?	Yes	No	No	Not Started	CSD	IBA Reporting Specialist	"Environmental Monitor Operating Procedures Manual" document, "Description of the IBA & Environmental Monitor Commitment" refer to C-228-26, page 6 and 7)	Interviewed IBA Reporting Specialist (as part of June 2019 report) - Buffland has made all materials available to on-site Environmental Monitors as part of their onboarding
		13.e. and shall work with representatives of the Company's environmental department to, inter alia, ensure the proper and adequate implementation of all management and monitoring plans specific to the physical environment.	13.e. Do Environmental Monitors work with representatives of the Buffland's environmental department to, inter alia, ensure the proper and adequate implementation of all management and monitoring plans specific to the physical environment?	Yes	No	No	Not Started	CSD	IBA Reporting Specialist	"Environmental Monitor Operating Procedures Manual" document, "Description of the IBA & Environmental Monitor Commitment" refer to C-228-26, page 6 and 7)	
14	15.10 regulatory Affairs	14.a. The Company will comply with all regulatory requirements associated with the Project, as described in their Sustainability Policy.	14.a. Has Buffland complied with all regulatory requirements associated with the Project as described in their Sustainability Policy?	Yes	Yes	Yes	Completed	ESG	Environmental Monitoring Specialist	Refer to slides 102-103 in C-234-8 - 2023 NRB Mitigation Workshop Presentation Refer to Section 4.3 (p. 47), Section 4.4 (p. 48-50), Section 4.5 (p. 50-54), Section 4.6 (p. 55-311) of A-244-12 2023 NRB Annual Report 50 Policy - C-248-9 Sustainable_Development_policy rev00 (1) Towards Sustainable Mining by Mining Association of Canada - https://mining.ca/companies/buffland-iron-mines-corporation/	BNJ underwent external verification in 2023 and self assessment in 2024. We have complied with all regulatory requirements under association reporting responsibilities.
		14.b. Including but not limited to the NRB Project Certificate.	14.b. Has Buffland complied with all regulatory requirements associated with the Project as described in their NRB Project Certificate?	Yes	No	No	Completed	ESG	Environmental Monitoring Specialist	Refer to Section 4.3 (p. 47), Section 4.4 (p. 48-50), Section 4.5 (p. 50-54), Section 4.6 (p. 55-311) of A-244-12 2023 NRB Annual Report	Interviewed IBA Reporting Specialist - The Annual reports outline the status of compliance with terms and conditions of the PC. Since they are not "all" marked as compliant, evidence provided does not support the completion of the Audit Question. The Status of PC Conditions in 2020" is an appendix attached to the 2020 annual report to the Nunavut Impact Review Board. The 2020 annual report to the Nunavut Impact Review Board was issued in May, 2021. Therefore, the 2020 report is the most recent and relevant evidence as of December 31, 2021. Sustainability Specialist/Manager, Community Resource Services (Sept 2022) Therefore, the 2021 NRB report is the most recent and relevant evidence as of June 30, 2022
		14.c. and all Nunavut Water Board licenses related to the Project.	14.c. Has Buffland complied with all regulatory requirements associated with the Project as described in all Nunavut Water Board licenses related to the Project?	Yes	No	No	Completed	Regulatory Affairs	Approvals Manager	Nunavut Water Board water licenses allow for the use of Water and the deposit of Waste in support of the Project. Summaries of our use of water and deposits of waste are provided in the Annual Report submitted for the Type A and B Water Licenses in the sections listed below. The concordance tables also list all of the requirements for the Annual Report and where the info can be found within each report. Type A Water License 2AM-MB1125 - Pages 36-44 (Sections on Water Use, Waste Management, Reported Incidents, Monitoring of C-244-14 - 2023 QIA NRB Annual Report for Ops - Main Body - As Sent and Annual Report Appendix A (Concordance Table) of C-244-14 - 2023 QIA NRB Annual Report for Ops - Appendix A (Concordance) - As Sent Type B Water License 2BE-MB12131 - Pages 4-14 (Parts B-1 of license) of C-244-14 - 2023 QIA NRB Annual Report for Geotech. - Main Body - As Sent, and Annual Report Appendix A (Concordance Table) of C-244-14 - 2023 QIA NRB Annual Report for Geotech. - Appendix A (Concordance) - As Sent.	Interviewed IBA Reporting Specialist - Buffland has complied with all regulatory requirements associated with the Project as described in all Nunavut Water Board licenses related to the Project, as described in the license renewals. Dawn Bortick, Approvals Manager (Sept 2022) Type B Water License has been renewed, new version has been provided in documented evidence
Total				37	33	33					
Yes				49	20	12					