BG GOLD
WHALE COVE

Wildlife Mitigation and Monitoring Plan

Whale Cove Exploration Project

PREPARED BY
ERM and WCGC

DATE
April 7, 2026

DOCUMENT DETAILS

Document Control	
Field	**Details**
DOCUMENT TITLE	Wildlife Mitigation and Monitoring Plan
PROJECT	Whale Cove Exploration Project
DOCUMENT NUMBER	BG-WC-WMMP-001
VERSION	B.0
DATE	7 April 2026
PREPARED BY	ERM
REVISED BY	Brian May, VP Exploration
APPROVED BY	Terry Holohan, CEO
COMPANY	Whale Cove Gold Corp
STATUS	Final

Revision History			
Version	**Date**	**Description**	**Author**
A.1	July 17, 2025	Original ERM WMMP	ERM
B.0	April 7, 2026	Revised in response to April 2, 2026, NIRB File # 25EA090 – opportunity to address comments	WCGC

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1. INTRODUCTION

This Wildlife Mitigation and Monitoring Plan (WMMP) describes how Whale Cove Gold Corp (WCGC, formerly Whale Cove Resources) will mitigate potential effects on wildlife and wildlife habitat due to mineral exploration activities for the Whale Cove Exploration Project (WCGC). WCGC, formerly known as the Pistol Bay Gold Project, is an advanced-stage gold exploration project located in the Kivalliq region of Nunavut on the western shore of Hudson Bay, approximately 60 kilometers (km) southwest of the hamlet of Rankin Inlet and 10 km west of the hamlet of Whale Cove (Figure 1-1).

The WMMP is intended to address federal and territorial laws and regulations and the various authorizations and permits held by WCGC including, but not limited to:

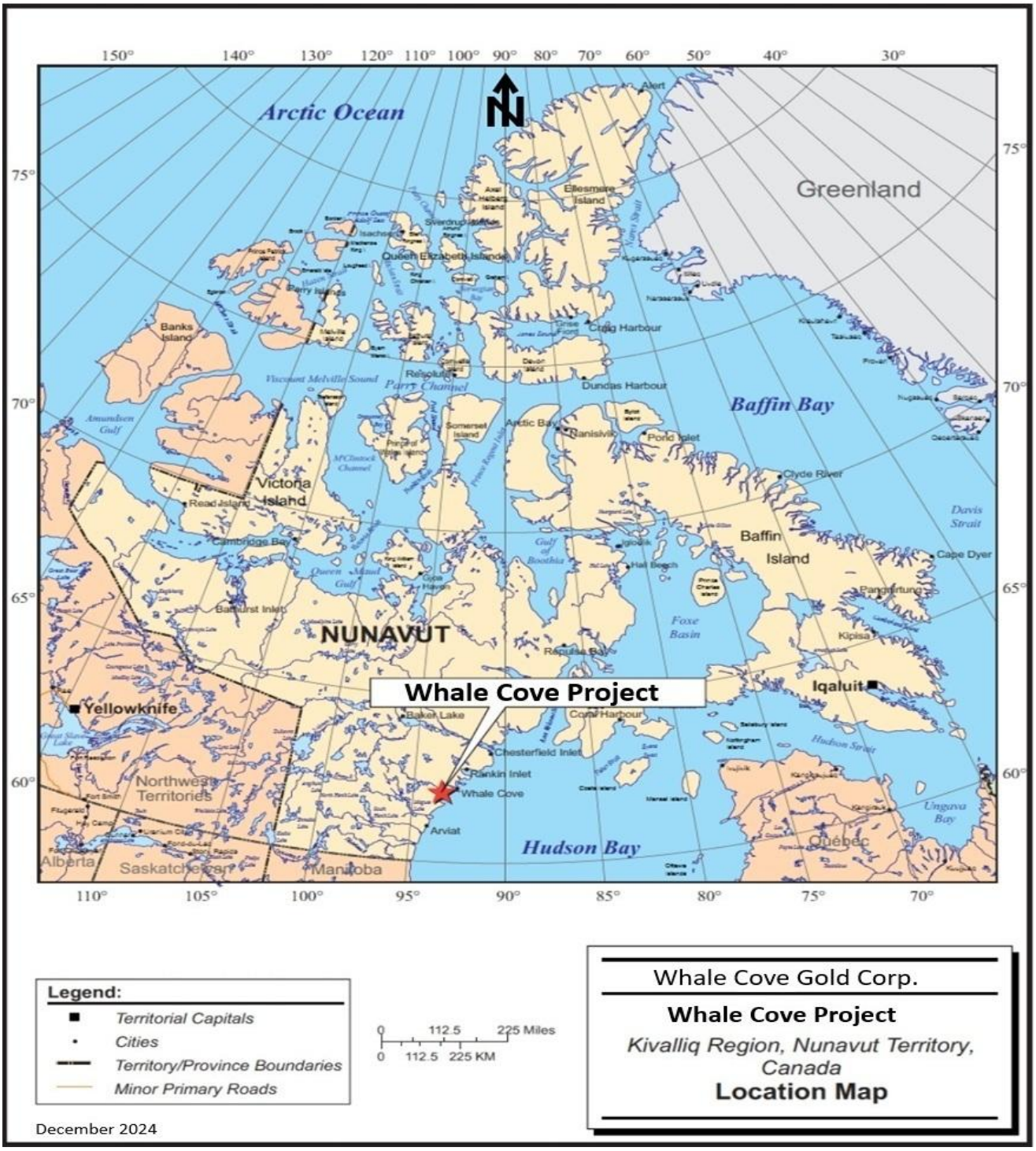
- Nunavut Impact Review Board (NIRB) screening 21CN042 (January 24, 2022) that includes a recommendation to prepare a Wildlife Mitigation and Monitoring Plan (WMMP) and conditions for general wildlife (21-26), migratory birds and raptors (27-28), aircraft (29-33), and caribou and muskox disturbance (34-38) (Appendix A);
- Kivalliq Inuit Association (KivIA) License for Inuit Owned Land (IOL) KVL325C02 (January 2026) that includes Mobile Conservation Measures for wildlife, specifically caribou and muskox (Appendix A); and
- Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) Land Use Permit N2021C0005 (June 8, 2021) that includes the Keewatin Regional Land Use Plan DIAND Caribou Protection Measures (released in June 2000; Appendix A).

The Qamanirjuaq barren-ground caribou herd (*Rangifer tarandus groenlandicus*) historically calved in a broad area inland from Whale Cove. However, data from the period 2010-2025 indicates the herd has moved its calving ground north approximately 70 km to the area north of Rankin Inlet, near the complex of Machum, Peter, Meliadine and Diana Lakes. Some permit guidance reflects historical caribou distribution; this WMMP incorporates updated data and protection areas for example, the Keewatin Regional Land Use Plan DIAND Caribou Conservation Measures were released in June of 2000 when caribou were calving near Whale Cove.

The WMMP provides direction to WCGC based on recent distribution and movement of caribou (2020-2025) with the objectives of reducing potential disturbance to wildlife, particularly caribou, and providing clear direction to WCGC to support regulatory compliance.

This WMMP integrates updated caribou mitigation and monitoring measures and reflects current regulatory expectations and operational practices.

FIGURE 1-1 WHALE COVE PROJECT LOCATION



2. PROPONENT INFORMATION

Whale Cove Gold Corp. (WCGC), a Canadian subsidiary of BG Gold Capital II Corp., holds a 100% interest in the Whale Cove Exploration Project (the Project), which includes two primary land packages:

- The **Whale Cove Property**, comprising 103 contiguous mineral claims totaling approximately 977 km²; and
- The **Tavani Property (WC-02)**, consisting of Inuit Owned Land (IOL) subsurface rights covering approximately 1,174 km².

These land holdings are collectively referred to as the Whale Cove Project and are located in the Kivalliq region of Nunavut, approximately 60 km southwest of Rankin Inlet and 10 km west of the hamlet of Whale Cove.

Exploration at the Whale Cove Project has been conducted by previous operators and has included prospecting, geological mapping, geophysical surveys, and drilling, primarily focused on the eastern portion of the property, including the Vickers deposit. WCGC acquired the Project in 2022 and has continued exploration activities.

The Project is an advanced-stage gold exploration project that includes the Vickers gold deposit. Exploration activities have historically focused on the eastern portion of the property, including drilling, geophysics, and geological mapping.

Recent work programs have advanced the Project significantly. In 2024, WCGC completed approximately 8,200 m of diamond drilling. In 2025, exploration activities included approximately 4,303 m of drilling, collection of over 1,000 till samples, geological mapping, ground magnetic surveys, and LiDAR data acquisition.

The Project is accessed via a trail from Whale Cove and by helicopter from Rankin Inlet. WCGC operates a seasonal exploration 35-person camp.

2.1 ROLES AND RESPONSIBILITIES

The VP Exploration is ultimately responsible for implementation and effectiveness of the WMMP.

The Camp Manager / designate is responsible for day-to-day implementation of the WMMP, including monitoring, compliance, and application of adaptive management measures.

The Camp Manager/ deisgnate and VP Exploration have the authority to adjust or suspend operations in response to wildlife observations and trigger-based management requirements.

The Chief Executive Officer provides overall corporate oversight and approval of the WMMP.

This WMMP integrates updated caribou mitigation and monitoring measures and reflects current regulatory expectations and operational practices.

2.2 OBJECTIVES

The objectives of the Whale Cove Project Wildlife Mitigation and Monitoring Plan (WCGC; WMMP) are:

1) Education of Project personnel so that all members of WCGC team have a personal goal of working in a respectful manner that is protective of Nunavut's wildlife resources.
2) Inclusion of Inuit Qaujimaningit (IQ) and Inuit Traditional Knowledge (TK) through working with local communities and knowledge holders to inform Project design and delivery.
3) Protection of wildlife, particularly caribou, from harm and disturbance.
4) Keeping Project personnel safe when dealing with wildlife near WCGC site.

3. REGULATORY CONTEXT

The Project is located in the Kivalliq Region near the hamlet of Whale Cove in Nunavut. It is subject to federal, territorial, and KivIA regulatory processes and requirements related to wildlife management as described in the following subsections.

The Camp Manager (or designate) / VP Exploration has authority to suspend operations in response to wildlife triggers.

3.1 FEDERAL

Federal legislation and regulations that apply to wildlife management in Canada include:

- *Species at Risk Act* (SARA; 2002) – Provides legal protection for species at risk in Canada to prevent wild species from being extirpated or becoming extinct, to provide for the recovery of wildlife species that are extirpated, endangered or threatened because of human activity.
- *Migratory Birds Convention Act, 1994* (1994) – Prohibits the killing, hunting, taking, injuring or harassment of migratory birds, their nests, and eggs without a permit. It also prohibits the deposition of harmful substances in areas frequented by migratory birds.
- *Migratory Birds Regulations* (2022) – Protects migratory birds and their nests when they contain a live bird or viable egg.
- *Fisheries Act* (1985) – Provides a legal framework to manage and protect fish and fish habitat (including marine mammals) in Canada with the ultimate intent of protecting Canada's fisheries and marine mammal resources. Marine mammals are not addressed in this WMMP because WCGC does not include shipping or other activities on the shore.

3.2 TERRITORIAL

Government of Nunavut legislation and regulations that govern wildlife management in Nunavut include:

- *Wildlife Act* (Chapter 26; 2003) – Lays out the comprehensive system for the management of wildlife and wildlife habitat in Nunavut, with direction on wildlife harvesting, habitat protection,

respectful conduct toward wildlife, and designation and protection of species at risk and their habitat.

- *Nunavut Land Claims Agreement Act* (1993) – Provides guidelines for the NIRB on the review of potential environmental and social effects of development projects.

3.3 PERMITS AND LICENSES

WCGC holds four Permits and Licenses for operation of WCGC, from the NIRB, KivIA, Indian and Northern Affairs Canada, and the Nunavut Water Board. The following sections list the requirements of WCGC that are addressed in the WMMP.

3.3.1 NUNAVUT IMPACT REVIEW BOARD

The Nunavut Impact Review Board (NIRB) is an institute of public government that completes screenings for exploration projects and reviews applications in Nunavut's integrated regulatory system. The NIRB conducted a screening of WCGC and issued screening report 21CN042 on January 24, 2022. This screening report includes a recommendation to prepare a Wildlife Mitigation and Monitoring Plan (WMMP) and conditions for:

- waste management (9-10),
- general wildlife (21-26),
- migratory birds and raptors (27-28),
- aircraft (29-33), and
- caribou and muskox disturbance (34-38)

The full list of terms and conditions are listed in Appendix A.

3.3.2 THE KIVALLIQ INUIT ORGANIZATION

The KivIA is a 'Designated Inuit Organization' (DIO) established under the *Nunavut Agreement* to represent the interests of all Inuit living in the Kivalliq region (KivIA 2018). All proposed activities on IOL in the region that require a permit, lease or license must be reported to the KivIA Lands Department.

The KivIA provided License KVL325C02 for exploration activities on IOL in January 2026. This license includes two Schedules with requirements for wildlife and fisheries:

- Schedule A includes an incidental sightings program for wildlife, a requirement to report any mortality or displacement of wildlife with a required fee schedule, and the requirement to deliver any killed wildlife to the KivIA (Appendix A). Schedule A also includes prohibitions against depositing deleterious substances in waterbodies, obstructing streams or removal of ice crossings before spring breakup.
- Schedule B includes Mobile Conservation Measures (MCM) for caribou and muskox (Appendix A).

License terms and conditions related to wildlife management are described in Section 3.2 of this WMMP.

3.3.3 CROWN-INDIGENOUS RELATIONS AND NORTHERN AFFAIRS CANADA

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), issued Land Use Permit N2021C0005 on June 8, 2021. This permit directs the proponent to adhere to the Caribou Protection Measures included in the Keewatin Regional Land Use Plan, released in June 2000 which are described in Appendix A of the permit.

These measures identify a Caribou Protection Area in the zone where caribou were calving in-land from Whale Cove in 2000. However, since 2010, the Qamanirjuaq caribou have moved their calving range north approximately 70 km to the area north-west of Rankin Inlet. The Caribou Protection Measures have provisions for the scenario where caribou have moved their calving grounds out of the Caribou Protection Area, and these provisions are reflected in this WMMP.

3.3.4 NUNAVUT WATER BOARD

WCGC holds Nunavut Water Board (NWB) Water Licence Type B 2BE-PBP2025 for the Project, which is currently being renewed in alignment with the ongoing NIRB screening process. The renewed Licence will reflect the current scope of proposed activities.

The existing Licence does not include terms and conditions related to wildlife or vegetation; these aspects are addressed through the Project's permits, licences, and this WMMP.

3.4 PLANS AND GUIDELINES

The following plans, guidelines, and standards of practice apply to wildlife and wildlife habitat in the exploration area.

3.4.1 THE BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD (BQCMB)

The Beverly and Qamanirjuaq Caribou Management Board (BQCMB) Management Plan for 2023-2032 (BQCMB 2024). The BQCMB incorporates Indigenous knowledge and addresses the multi-jurisdictional nature of migrating caribou herds and the multiple cultures of affected Indigenous peoples (BQCMB 2024). The BQCMB Management Plan for 2023-2032 identifies industries operating on the caribou ranges as a target audience but does not have regulatory requirements for WCGC.

4. OVERVIEW OF WILDLIFE SPECIES

4.1 CARIBOU

The Qamanirjuaq caribou are a herd of barren-ground caribou, which has been identified as a species of concern by the Nunavut government, are listed as Threatened by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC, 2016) and are currently under consideration for addition to Schedule 1 of the Canadian *Species at Risk Act* (2002). Caribou continue to be important to the cultures of northern Indigenous peoples, providing food, clothing and shelter.

The Qamanirjuaq herd is considered stable or increasing by the BQCMB (BQCMB 2025). The most recent estimate of the population reported 252,892 animals in 2022 (Campbell et al. 2024), which

is consistent with the previous estimate in 2017 of 288,000 caribou (BQCMB 2021) and 2014 of 265,000 caribou, but a decrease from the peak reported population in 2008 of 344,000 caribou (BQCMB 2021).

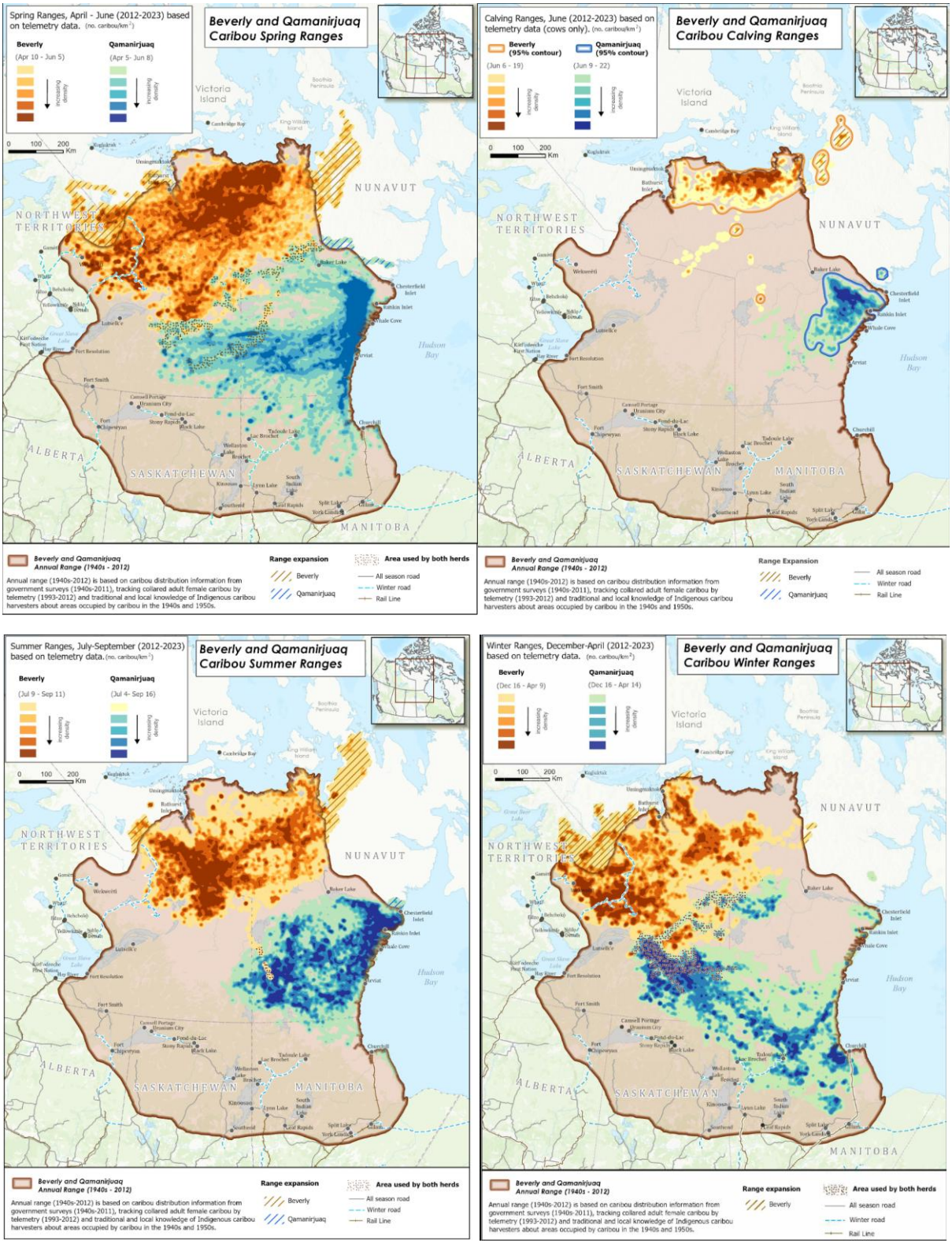
The Qamanirjuaq herd has a seasonal migration that includes WCGC location:

- **Fall and Winter (Sept 17-April 14):** The herd winters in southern Nunavut and northern Manitoba, although their historic range included further south into Manitoba and into Saskatchewan.
- **Spring Migration (April 15-June 8):** The herd travels north along the Hudson Bay Coast, past Arviat, Whale Cove and Rankin Inlet. This is the first of two periods where the Qamanirjuaq caribou are likely to interact with WCGC area.
- **Calving (June 9–June 22):** The herd gathers and calves over a two-week period in the area of Machum, Peter, Meliadine and Diana Lakes. The calving range was historically west of Whale Cove, but since 2010 has moved approximately 70 km north to the north of Rankin Inlet. In 2025, the calving range remained in the area south of Meliadine Lake.
- **Post-Calving (June 23–July 3):** The herd coalesces into very large groups of several thousand animals and travels towards the coast of Hudson Bay. Before 2019, the herd generally spread out over a wide area and traveled south to overlap the area inland from Whale Cove. The Nunavut Planning Commission shows WCGC within the post-calving area for the Qamanirjuaq herd, but data indicates this has not been the case for approximately 10 years.
- **Summer (July 4–Sept 16):** During summer, the herd continues to occur in large groups, likely for insect relief, and travels south. This is the second period when caribou are currently likely to interact with WCGC.

Figure 4.1-1 illustrates the current annual ranges of the Qamanirjuaq herd. Figure 4.1-2 illustrates the current calving range of the Qamanirjuaq herd. Maps are developed from publicly available mapping for mining projects on the NIRB Public Registry (2024).

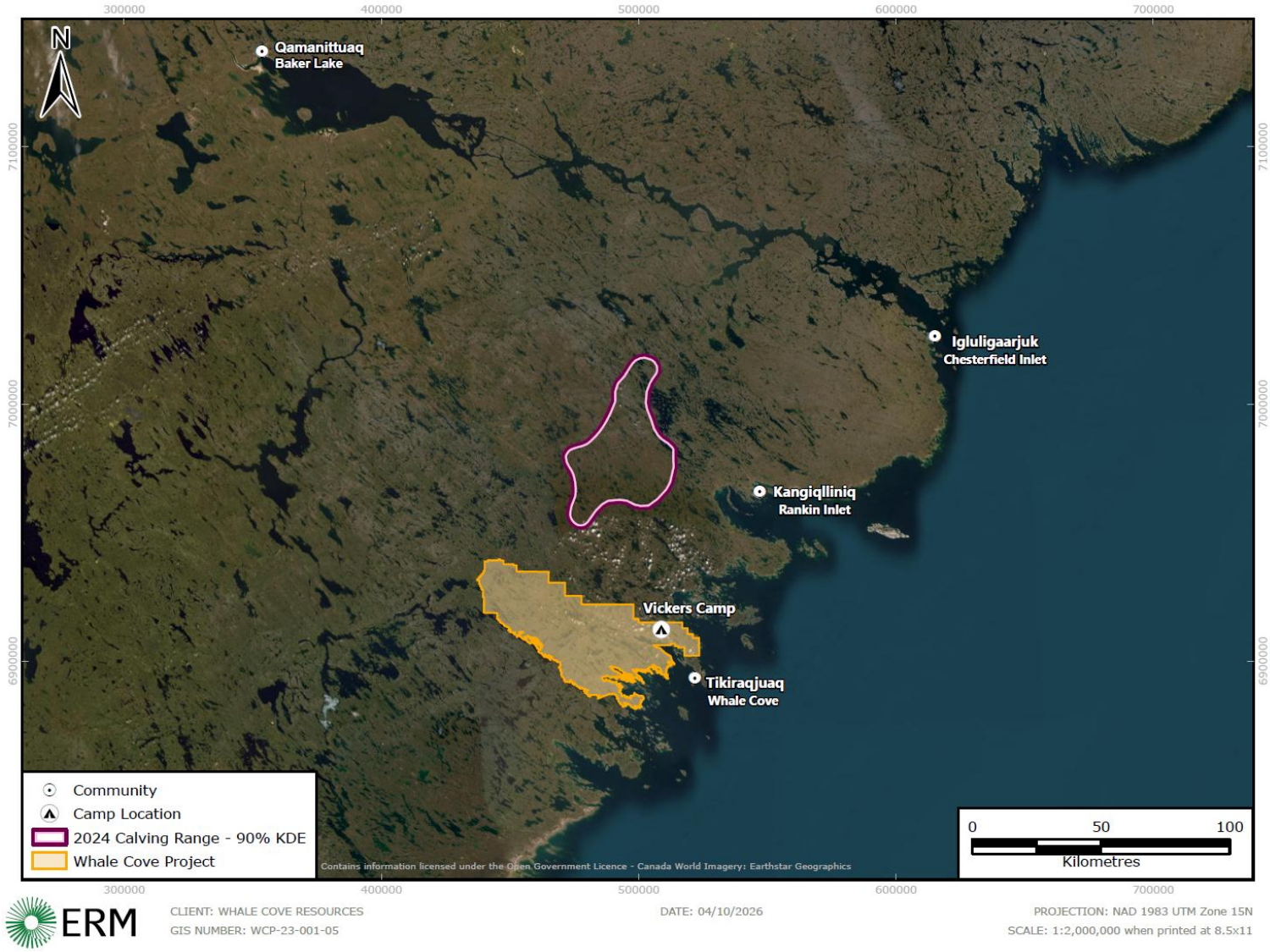
Caribou are considered sensitive to disturbances from aircraft and vehicles, and noise from exploration activities such as exploration drilling; therefore, mitigation for caribou focuses on these activities.

FIGURE 4.1-1 QAMANIRJUAQ HERD ANNUAL RANGES; SPRING MIGRATION (TOP LEFT), CALVING (TOP RIGHT), SUMMER (BOTTOM LEFT) AND WINTER (BOTTOM RIGHT)



Maps developed by the BQCMB (2025).

FIGURE 4.1-2 QAMINIRJUAQ CARIBOU CALVING RANGE FOR 2024



4.2 MUSKOX

It is estimated that Nunavut is home to approximately 60,000 muskox (*Ovibos moschatus*). WCGC falls within Nunavut's muskox management zone MX-13, which includes the central Kivalliq muskox subpopulation. Collection of Inuit Qaujimajatuqangit and completion of aerial surveys in 2010, 2012, 2016, and 2017 indicate muskox populations may extend east to the coast of Hudson Bay (Campbell 2019). The NIRB and KIA conditions include mitigation for muskox.

Muskox are herbivores, relying on grasses, sedges (*Carex* spp.), forbs, and woody plants like willow (*Salix* spp.). During summer, muskox occur in river valleys, lakeshores and seepage meadows but muskox are unable to dig through heavy show to access vegetation and are more likely to occur on hilltops, slopes and plateaus in the winter where snow has been blown away (Government of Nunavut 2022). They do not undertake long migrations like caribou.

When threatened, muskox often create a defensive circle and will stand down predators such as wolf and grizzly bear. Muskox were over-hunted by the early 1900s, partly because they tend to face down predators and harvesters instead of fleeing but are now recovering (Nunavut Qiviut 2025). Traditionally, Inuit used muskox for a variety of purposes, including gathering qiviut, for meat, hides and fur for insulating sleeping mats, and horn and bone for tools and carvings as part of Inuit economy and culture (Nunavut Qiviut 2025).

Like caribou, muskox are considered sensitive to disturbances from aircraft and vehicles, and noise from exploration activities such as exploration drilling; and mitigation for muskox focuses on these activities.

4.3 BEARS AND FURBEARERS

Polar bears (*Ursus maritimus*) are known to occur on the south-west coast of Hudson Bay, including the communities of Whale Cove and Arviat. Polar bears are listed by both COSEWIC and SARA Schedule 1 as Species of Special Concern. Polar bears have great value culturally, spiritually and economically for Inuit. Polar bears rely on both marine (sea-ice) and terrestrial habitats for their life processes (e.g., most females den on land) and both sexes hunt on the sea ice. With declines in sea-ice related to climate change, polar numbers are expected to decline. Polar bears can be attracted to camps, and the primary management concern is to reduce the attractiveness of camps and maintain safety for Project personnel.

Grizzly bears (*Ursus arctos horribilis*) occur across Nunavut, with a population of 1,500 to 2,000 in the territory. Grizzlies in Nunavut (the Grizzly Bear, Western population) are listed by both COSEWIC and SARA Schedule 1 as a Species of Special Concern. Grizzly bears will typically avoid areas with polar bears and so are not commonly observed along the coast of Hudson Bay, as they are in other coastal areas of Nunavut. Grizzly bears are omnivores and are frequently attracted to camps and human structures. The primary management concern is to reduce the attractiveness of camps to reduce the chance of creating a habituated bear that may be a safety concern for the bear and Project personnel. Grizzly can also be disturbed by helicopters and so management for aircraft is included in the WMMP.

Wolverines (*Gulo gulo)* are large members of the Mustelid family with an estimated population of approximately 10,000 mature adults in Canada (COSEWIC 2014). They are listed as a Species of Special Concern by both COSEWIC and SARA Schedule 1. Wolverine den during the winter to breed, but they do not hibernate. Wolverine are known to be attracted to camps and structures where they can cause considerable damage from chewing on pipes and electrical wires. Management for wolverine focuses on reducing the attractiveness of camps and deterring habituated animals.

Arctic grey wolves (*Canus lupus arctos)* are predators who hunt large mammals typically follow the caribou migrations. Wolves are not typically recorded being attracted to exploration camps in Nunavut.

4.4 BIRDS

Nunavut provides critical breeding grounds for many migratory birds, including gyrfalcon (*Falco rusticolus*), Arctic tern (*Sterna paradisaea*), sandhill crane (*Grus canadensis*), and many waterfowl and shorebirds. Notable year-round resident species include the rock ptarmigan (*Lagopus muta*), snowy owl (*Bubo scandiacus*), and common raven (*Corvus corax*). The rock ptarmigan is the territorial bird of Nunavut and is important in northern Indigenous cultures and traditions.

WCGC area may provide suitable habitat for ducks, geese, grouse, ptarmigan, shorebirds, gulls, terns, grebes, heron, cranes, nighthawks, raptors, corvids, songbirds, etc. WCGC is in nesting zone N10 where breeding bird season begins around May 17 and extends to about August 19, with most species (61 – 100%) nesting between June 8 and July 22 (ECCC 2025). Migratory birds are protected by the *Migratory Birds Convention Act, 1994* and associated regulations.

The primary mitigations for birds are avoiding mortality and damaging eggs and nests by avoiding clearing vegetation during their breeding season or conducting pre-clearing surveys if clearing must occur during the breeding season; avoiding pollution of waters used by ducks and shorebirds; and managing camp activities when birds choose to nest on structures. Large seabird colonies can be disturbed by helicopters, but none have been identified in WCGC area.

4.5 POTENTIAL SPECIES OF CONCERN

Potential wildlife species of concern that may be encountered during exploration activities are included in Table 4.5-1. Species of concern for the purposes of the WMMP are defined as those listed by COSEWIC as endangered, threatened, or special concern; listed on one of the Schedules of SARA; or listed by the Government of Nunavut.

TABLE 4.5-1 WILDLIFE SPECIES OF CONCERN KNOWN TO OCCUR IN THE KIVALLIQ REGION

Group	Common Name	Scientific Name	Federal Designation		Territorial Status[1]
			COSEWIC Status	*Species At Risk Act* Schedule 1	
Mammals	caribou (Qamanirjuaq herd)	*Rangifer tarandus groenlandicus*	Threatened	Not Listed	Vulnerable
	grizzly bear	*Ursus arctos horribilis*	Special Concern	Special Concern	Vulnerable
	wolverine	*Gulo gulo*	Special Concern	Special Concern	Vulnerable
Upland Birds	Harris's sparrow	*Zonotrichia querula*	Special Concern	Special Concern	Apparently Secure
	hoary redpoll	*Carduelis hornemanni*	Not Listed	Not Listed	Vulnerable
	snow bunting	*Plectrophenax nivalis*	Not Listed	Not Listed	Apparently Secure
Raptors	golden eagle	*Aquila chrysaetos*	Not at Risk	Not Listed	Vulnerable
	peregrine falcon	*Falco peregrinus anatum/tundrius*	Not at Risk	Not Listed	Apparently Secure
	short-eared owl	*Asio flammeus*	Threatened	Special Concern	Vulnerable
Seabirds and Seaducks	common eider	*Somateria mollissima*	Not Listed	Not Listed	Vulnerable
Shorebirds	American golden-plover	*Pluvialis dominica*	Not Listed	Not Listed	Vulnerable
	black-bellied plover	*Pluvialis squatarola*	Not Listed	Not Listed	Vulnerable
	buff-breasted sandpiper	*Tryngites subruficollis*	Special Concern	Special Concern	Vulnerable
	least sandpiper	*Calidris minutilla*	Not Listed	Not Listed	Secure
	ruddy turnstone	*Arenaria interpres*	Not Listed	Not Listed	Vulnerable
	red knot	*Calidris canutus*	Endangered/Special Concern	Yes	Vulnerable
	red-necked phalarope	*Phalaropus lobatus*	Special Concern	Special Concern	Vulnerable
	sanderling	*Calidris alba*	Not Listed	Not Listed	Vulnerable
	semipalmated sandpiper	*Calidris pusilla*	Not Listed	Not Listed	Vulnerable

[1] Territorial status is current to 2015 and are presented in the 2015 Wild Species Report (CESCC 2015).

5. MITIGATION MEASURES

The following mitigation measures represent standard practices that are carried out by WCGC during field and camp operations to reduce potential effects of WCGC on the environment. They include mitigation required in the NIRB screening report, KivIA License and CIRNAC Land Use Permit, industry best practices and specific direction provided by the KivIA and the Whale Cove Mayor and wildlife officer. Management for caribou occurring at site is discussed in Section 6 and management for problem wildlife is discussed in Section 7.

5.1 EDUCATION AND POLICIES

The goal of employee education is to create employee and contractor awareness of their responsibilities to reduce the potential effects of WCGC on wildlife and wildlife habitat, and to help support the safety of employees and contractors.

Camp policies include:

- There is no fishing or harvesting for Project personnel at the site unless they have an appropriate permit from the Government of Nunavut.
- No Project and contractor will carry personal firearms (except in the case of a certified wildlife monitor or company security monitor who is carrying a firearm for the safety of workers in the field) nor hunt on WCGC site. These monitors will be trained and certified in firearm safety.
- No Project or contractor staff shall litter or feed wildlife.

Education will include such topics as:

- Basic local ecology and wildlife identification,
- Driving expectations and restrictions (e.g., wildlife has right-of-way, speed limits),
- Wildlife-sensitive locations (e.g., calving grounds, designated caribou freshwater crossings),
    - The CIRNAC permit directs the WCGC to adhere to the Caribou Protection Measures included in the Keewatin Regional Land Use Plan identifies freshwater crossings in the Keewatin, but none in the Whale Cove area (Appendix A). WCGC is working with Inuit Land users to install cameras and identify whether freshwater crossings occur in WCGC area.
- Wildlife timing windows (e.g., breeding bird season, caribou calving and post-calving periods),
- The importance of keeping the camps and facilities clean and free of wildlife attractants,
- Reporting incidental observations of wildlife and any wildlife incidents (injuries or mortalities).
- Bear-awareness training.

Resources for bear safety and living in bear country are available from:

- Bear Safety - Reducing Bear-People Conflicts in Nunavut Booklet .pdf
- Yukon Environment - Guidelines-industrial-activity-bear-country.pdf
- Video - Working in Bear Country for Industrial Managers, Supervisors and Workers
- Parks Canada - Safety in Polar Bear Country

5.2 CAMP MANAGEMENT

Several wildlife species can be attracted to camps; therefore, camp mitigation is advised to reduce the chance of producing a habituated animal. Measures include:

- Designing and maintaining camp buildings so wildlife cannot gain access – skirting boards on buildings, closing latching doors.
- Having buildings or structures for storing wastes such as food wastes, fuel oil, and other attractants where wildlife cannot access it.
- Having garbage bins in locations where they can be used but are not accessible or openable by wildlife.
- Sections 16 – 24 of Schedule A of the KIVIA Land Use License describe terms and conditions related to fuel and chemical storage and drilling fluid handling in further detail (Appendix A).
- Store and handle fuels and hazardous materials safely such that wildlife, including caribou, are not exposed to fuels or hazardous materials.
- Conduct noise abatement including:
    - Fit vehicles and equipment with appropriate mufflers and silencers.
    - Ensure vehicles are well-maintained.
    - Minimize idling of vehicles, where possible.
    - House stationary sources of noise in buildings.

5.3 WASTE MANAGEMENT

Several wildlife species can be attracted to camps and the smells and food rewards available around people. Waste management is key to reduce the attractiveness of camps and includes management of waste water, food waste, and human waste. NIRB conditions include:

- Manage all hazardous and non-hazardous waste including food, domestic wastes, debris, and petroleum-based chemicals (e.g., greases, gasoline, glycol-based antifreeze) in such a manner to avoid release into the environment and access to wildlife at all times until disposed of appropriately or at an approved facility.
- All combustible wastes will be incinerated as needed and dispose of as required by the appropriate authorizing agencies.
- All non-combustible wastes from WCGC site shall be removed to an approved facility for disposal.

In addition, best management practices for wastes will be followed, including:

- Sort wastes so that attractants are handled separately, such as food wastes, grease, oil and other substances with strong odours, to limit the attractiveness to wildlife.
- Storing animal-attractant waste in wildlife-proof containers or buildings, including trash cans and dumpsters with a bear-resistant design.

- Regular removal of animal-attractant wastes and incinerating in an approved incinerator or transportation off site.
- Should a spill occur, measures will be taken immediately to address clean-up of the spill. Spills will be reported to the Nunavut 24-hour Spill Report Line at (867) 920-8130. This number will be posted in the camp lunchroom.
- Conducting monthly road and camp inspections and cleanups.
- Conducting monthly waste management inspections and implementing typical adaptive management, including:
    - Repairing and maintaining waste containers based on inspections and plan performance.
    - Refresher training for personnel on waste management responsibilities and techniques.

Environment Canada information on Batch Waste Incineration is available here:

- Environment Canada 2010 Technical Document for Batch Waste Incineration

5.4 VEGETATION CLEARING MANAGEMENT

Vegetation clearing management is conducted to reduce the chance of damaging a wildlife residence while it is active; including birds' nests during the spring/summer and dens for predators such as bears, wolves and wolverines during the winter. Following the mitigation hierarchy, avoidance is the first mitigation by avoiding clearing when nests and dens are active. Should construction of new structures or vegetation clearing be required during these periods, then mitigation includes:

- During spring and summer, a trained Project person familiar with Nunavut birds and bird clearing will survey areas for birds' nests prior to vegetation clearing or building structures. If bird nests or breeding behaviour (e.g., carrying food to young, discarding fecal sacs, aggressive displays) are observed, establish a no-activity buffer (30 m minimum) and avoid disturbing the area until the young have fledged from the nest.
    - More information on avoiding impacts to birds is available in: Environment and Climate Change Canada's 2017 Avoidance Guidelines
- During winter, survey areas of snow drifts or riparian vegetation prior to building roads or structures with a thermal camera for wolverine or bear dens.

5.5 TRAIL AND ROAD MANAGEMENT

Trail and road management for WCGC is designed to keep wildlife safe and reduce disturbance to wildlife from noise and moving vehicles. Mitigation includes:

- WCGC will use existing trails or roads and ATV tracks whenever possible.
- Only move equipment offroad if the ground is able to support the weight of equipment without developing ruts and stop moving that type of equipment at that location if rutting occurs.
- Wildlife has the right-of-way on any roads or trails. Vehicles are required to slow down or stop and wait to allow wildlife to cross roads or trails at any location.

- All drivers will follow safe speed limits of 40 km/hr for vehicles travelling along the road to ensure drivers have sufficient time to react in a safe manner if wildlife is encountered on or adjacent to the road or trail.
- All drivers will maintain spacing appropriate for driving and road conditions and speed limits to ensure drivers have time to safely react to any wildlife on the road.

5.6 FIXED WING AIRCRAFT MANAGEMENT

As part of its commitment to minimizing potential disturbance to wildlife due to exploration activities WCGC requires pilots of fixed wing aircraft to:

- Be aware of where the caribou calving and post-calving areas are,
- Stay at least 610 m above these areas during calving and post-calving periods and when caribou are present. Otherwise, stay at least 300 m in elevation at all times unless landing or taking off. This direction is in keeping with a current agreement with the Whale Cove Mayor and wildlife officer.
- The Beverly and Qamanirjuaq Caribou Management Plan (2023-2032) identifies June 9-22 as calving and June 23-July 3 as post-calving for the Qamanirjuaq herd).

5.7 HELICOPTER MANAGEMENT

Many wildlife species are sensitive to disturbances and can react negatively or abandon areas with low-flying helicopters. WCGC has several conditions related to helicopters and wildlife, summarized below:

- Helicopters will not chase, weary, harass or molest wildlife, including:
  - persistently circling, chasing, hovering over, pursuing or in any other way harass wildlife, or
  - disturbing large groups of animals.
- Pilots will plan flights to avoid known nesting locations or aggregations of wildlife.
- All flights must be a minimum of 300 m above ground.
- When flying over calving (June 9-22) and post-calving areas (June 23-July 3) or above caribou, flights must be a minimum of 610 m above ground. This is in keeping with a current agreement with the Whale Cove Mayor and wildlife officer. When transiting between locations, maintain 610 m elevation unless there is a requirement for low level flight, e.g., drill moves or surveys.
- Conduct low-level long lining for drill moves only when caribou are not present.
- Helicopters will not land in areas where wildlife is present.

5.8 CARIBOU-SPECIFIC MITIGATION MEASURES

- Maintain a minimum 500 m buffer from individual caribou
- Maintain a minimum 1 km buffer from groups of caribou
- Aircraft shall maintain minimum altitudes of 300 m (general) and 610 m during sensitive periods

- Vehicles shall not exceed 40 km/h and must yield to wildlife
- Drilling shall avoid initiating disturbance when caribou are present nearby

6. MANAGEMENT FOR CARIBOU

This section describes monitoring and management for caribou to reduce disturbance to caribou as they pass through and use WCGC area. This WMMP combines the conditions from the NIRB screening, KivIA permit and CIRNAC permit (Section 3.3, Appendix A) into a simple program for managing effects on caribou. The measures were developed considering Inuit Traditional Knowledge and the current habitat use of the herd (last 5 years) to produce a set of Mobile Conservation Measures (MCM) specific to the Whale Cove Project location.

The Qamanirjuaq caribou herd is known to occur in WCGC area during the spring migration as it travels north to the calving range near Rankin Inlet, and again in summer or fall as the animals move south. The KivIA MCM provide directions for camps that are located in calving range on IOL and camps outside the calving range. The Whale Cove Project is outside of the current Qamanirjuaq calving range; therefore, the MCM for outside of calving range are applied here.

WCGC recognizes that the location of caribou calving areas may vary between years. Recent observations and available data indicate that primary calving areas are currently located north of Rankin Inlet, at a distance from the Project area. However, caribou movement patterns are dynamic, and animals may occur within or near the Project area. As such, a conservative, trigger-based mitigation approach has been implemented to account for this potential variability.

The Project will use available data sources, including collar data and field observations, to assess caribou presence and movement in real time. Management actions will be implemented in accordance with the trigger-based framework described in this section to ensure that operations are adjusted as required to minimize disturbance.

6.1 LEVEL 1 – NORMAL OPERATIONS

Level 1 – Normal Operations

Trigger:

- No caribou observed within 30 km of the Project area

Actions:

- Standard mitigation measures are implemented as outlined in this WMMP
- Routine operations, including drilling, vehicle use, and aircraft activity, may proceed
- Personnel remain vigilant and report wildlife observations

Level 1 is normal operations of WCGC, conducting exploration, drilling and camp operations. Standard mitigation measures, as described in Section 5, are followed during Level 1.

During periods when caribou are more likely to be on site and during sensitive seasons such as calving, WCGC will review maps of Qamanirjuaq caribou collar locations provided by the GN through a Data Sharing Agreement (DSA). Should the herd be approaching WCGC, the Camp Manager or designate will trigger Level 2, monitoring for caribou.

Level 2 Monitoring is triggered by the observation of **1 caribou collar within 30 km** or by the incidental observation of **50 caribou within 30 km**. The objective is to trigger monitoring before the animals approach, so preferably by studying the maps and gauging the approach of the herd.

6.2 LEVEL 2 – MONITORING FOR CARIBOU

Level 2 – Increased Monitoring
Trigger:

- Caribou observed within 30 km of the Project area, or
- Collared caribou identified as approaching the Project area

Actions:

- Initiate active monitoring, including Height of Land (HOL) observations where feasible
- Increase communication between field personnel and site management
- Ensure all personnel are aware of wildlife presence and potential for escalation
- Prepare for potential implementation of higher-level management actions

Level 2 is active monitoring for caribou using Height of Land (HOL) monitoring, which is conducted from a suitable hilltop that is accessible from the camp or road. Monitoring should be conducted by trained personnel following the Standard Operating Procedure (SOP). The KivIA MCM require that WCGC send them the name of the trained monitor, and to immediately report any observations of caribou.

Level 3 Management is triggered by the observation of **50 caribou within 5 km** of WCGC from either HOL surveys or incidental observations. The site can return to Level 2 – Monitoring when there are fewer than 50 caribou within 5 km of the site.

6.3 LEVEL 3 – MANAGEMENT FOR CARIBOU

Level 3 – Active Management / Reduced Operations/ Temporary Shutdown (as needed)
Trigger:

- Groups of ≥50 caribou observed within 5 km of active Project operations

Actions:

- Suspend non-essential activities (ie. shutdown)
- Reduce vehicle movement to the minimum required for safe operations
- Avoid initiating new disturbances (e.g., mobilization, drill starts)

- Increase monitoring frequency and maintain continuous awareness of caribou location and behaviour

Operations may resume once caribou have moved a sufficient distance away from active work areas and are no longer exhibiting signs of disturbance. The decision to resume activities will be made by the Camp Manager or designate, based on monitoring data and field observations

6.4 MANAGEMENT FOR WATER CROSSINGS

The KivIA MCM include management for water crossings. The Keewatin Regional Land Use Plan identifies locations for water crossings but does not identify one at Whale Cove on their map of Caribou Protection. The Nunavut Planning Commission identifies a water crossing for caribou west of Whale Cove, at Whiterock Lake. However, collar maps suggest that caribou travel north and southwest of this location.

WCGC is working with Inuit Land users and KivIA to identify whether there is a water crossing near WCGC, by working with community members from the hamlet of Whale Cove and installing cameras to monitor potential crossing locations.

The CIRNAC license indicates that WCGC should not build any structures that block access to freshwater crossings. The MCM indicate that on IOL between May 15 and Sept 15, the following are not permitted:

- WCGC will not construct camps or other permanent structures of conduct blasting within 10 km of a designated caribou freshwater crossing.
- Exploration activities are not permitted within 5 km of water crossings.

Monitoring for caribou near the water crossing and management of Project activities near the water crossing are addressed by the general monitoring and management measures listed in the proceeding sections. In the absence of confirmed crossings, precautionary monitoring and standard setbacks will be applied.

7. MANAGEMENT FOR PROBLEM WILDLIFE

Bears and furbearers can become habituated to camps if they are attracted by the smells from food or waste or if they can access food. If an animal has received a food reward or loses its innate fear of humans, the animal can become a safety risk to personnel and should be deterred for its own safety.

The following measures are meant to ensure the safety of personnel and dissuade habituated or aggressive wildlife from visiting the site. At least one person on site at all times should be trained in appropriate bear and predatory wildlife responses, including use of deterrents.

Ideally, this list of options would be followed sequentially as a situation develops, but in some circumstances some of the management responses are not feasible and the Camp Manager/

designate may choose to escalate the actions taken in response to an aggressive, predatory, or injured animal:

- Monitoring – Report and record incidental wildlife sightings and signs. If it is a dangerous animal such as a polar or grizzly bear, then alert the camp by calling "Code Red" on the radio.
- Communicate warnings – Provide accurate and current information of all potentially dangerous wildlife in areas with personnel.
- Area closures – Restrict worker access to areas with problem wildlife, pending suitable controls.
- Investigate – After the immediate threat has passed, investigate why the animal was observed on site; whether it was receiving a food reward, interested in wastes, etc. the Camp Manager/ designate will then direct appropriate cleanup and adaptive management, which may be:
    - Refresher training for personnel,
    - Updates to waste management handling procedures,
    - Cleanup of the camp,
    - Repairs or upgrades to the camp – for instance installing new waste storage structures, upgrading doors, etc.
- Adverse conditioning (AVCD) – Apply AVCD activities to problem wildlife to prevent or reverse habituation.
- Destruction – Following consultation with Conservation Officers with the Department of Environment for the Whale Cove area, the Service may choose destruction for the aggressive, predatory, or injured animal if the animal is considered to pose an unacceptable hazard to human safety.
    - If the situation is rapidly evolving (e.g., charging problem bear), the animal will be destroyed and then the CO will be notified.

The VP Exploration will record bear and furbearer observations, communicate with the local Conservation Officer (CO) before management response if time allows, and will report to the Conservation Officer after any management is taken. The Nunavut Department of Environment's Wildlife Office in Whale Cove can be contacted at (867) 896-9187 and the office in Arviat at (867) 857-2976.

More information on bear safety and living in bear country is available here:

- Bear Safety - Reducing Bear-People Conflicts in Nunavut Booklet .pdf
- Yukon Environment - Guidelines-industrial-activity-bear-country.pdf
- Video - Working in Bear Country for Industrial Managers, Supervisors and Workers

8. MONITORING PROGRAM AND REPORTING

WCGC will maintain an incidental monitoring program. It is the responsibility of all personnel to report wildlife sightings:

- Document and report all relevant observations of wildlife to the Camp Manager/ designate, especially observations of caribou, muskox, bears, moose, and species of concern.
- Project staff will be trained how to document and report observations.
- The Camp Manager/ designate will provide summary reports to the VP Exploration monthly.
- The VP Exploration will submit written reports of wildlife sightings and interactions to KivIA on a quarterly basis.
- These sightings will be recorded in a log with the following fields:
    - Date,
    - Name of reporting personnel,
    - Species,
    - Number of individuals,
    - Location description,
    - UTM – if available,
    - Behaviour – what were they doing?
    - Comments.
- Sightings can be used for adaptive management – e.g., observations of a weasel in camp may indicate that they are attracted by smells or are receiving a reward. Observations of caribou can trigger management.

9. WILDLIFE INCIDENTS AND ACCIDENTS

Incidents and accidents can occur on exploration projects. The Camp Manager/ designate will be responsible for recording information on the incident or accident and reporting it to the proper authorities.

WCGC will:

- Submit a written report to KivIA (and others as required by law) detailing any incident that results in the killing or relocation of any wildlife as a result of the Licensee's activities, immediately upon occurrence of the incident, together with compensation listed in the KivIA permit.
- Subject to law, deliver any valuable parts of wildlife killed because of the Licensee's activities to the HTO designated by KivIA in a timely manner so as to preserve the quality of the wildlife parts.

10. REPORTING

Project screenings, licenses and permits include several forms of required reporting for wildlife, including:

- Quarterly reporting of wildlife incidental observations and interactions to the KivIA.
- Reporting the name of the camp personnel trained and responsible for HOL surveys.
- Immediate reporting any caribou observations during HOL surveys.
- A written report to the KivIA should a wildlife incident occur that results in the killing or relocation of wildlife that describes the incident and compensation for the incident.
- Should a spill occur, measures will be taken immediately to address clean-up of the spill. Spills will be reported to the Nunavut 24-hour Spill Report Line at (867) 920-8130.

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APPENDIX A SCREENING AND PERMIT TERMS AND CONDITIONS

NIRB SCREENING 21CN042

Waste Management

9. The Proponent shall manage all hazardous and non-hazardous waste including food, domestic wastes, debris, and petroleum-based chemicals (e.g., greases, gasoline, glycol-based antifreeze) in such a manner to avoid release into the environment and access to wildlife at all times until disposed of appropriately or at an approved facility.

10. The Proponent shall incinerate all combustible wastes as needed and dispose of as required by the appropriate authorizing agencies. All non-combustible wastes from WCGC site shall be removed to an approved facility for disposal.

Wildlife – General

21. The Proponent shall not substantially alter or damage or destroy any wildlife habitat in conducting this operation unless otherwise authorized by the appropriate authorizing agencies.

22. The Proponent shall not chase, weary, harass or molest wildlife. This includes persistently circling, chasing, hovering over, pursuing or in any other way harass wildlife, or disturbing large groups of animals.

23. The Proponent shall not hunt or fish, unless proper Nunavut authorizations have been acquired.

24. The Proponent shall ensure that all wildlife have the right-of-way on any roads or trails. Vehicles are required to slow down or stop and wait to permit the free and unrestricted movement of wildlife across roads or trails at any location.

25. The Proponent shall enforce safe speed limits for vehicles travelling along the road to ensure drivers have sufficient time to react in a safe manner if wildlife is encountered on or adjacent to the road or trail.

26. The Proponent shall ensure that drivers maintain spacing appropriate for driving and road conditions, and speed limits, to ensure drivers have time to safely react to any wildlife on the road.

Migratory Birds and Raptors Disturbance

27. The Proponent shall carry out all phases of WCGC in a manner that protects migratory birds and avoids harming, killing, or disturbing migratory birds or destroying, disturbing, or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's *Avoidance Guidelines*. The Proponent's actions in applying the *Avoidance Guidelines* shall be in compliance with the *Migratory Birds Convention Act, 1994* and with the *Species at Risk Act*.

28. The Proponent shall not disturb or destroy the nests or eggs of any birds. If active nests of any birds are discovered or located (i.e., with eggs or young), the Proponent shall avoid these

areas until nesting is complete and the young have naturally left the vicinity of the nest by establishing a protection buffer zone[1] appropriate for the species and the surrounding habitat.

KIVIA LICENSE #KVL325C02 SCHEDULE A WILDLIFE CONDITIONS

Wildlife Sighting and Incident Program

Under section 29 in Schedule A of the license, WCGC is required to "*institute a wildlife sighting and incident program and will:*

a) *Submit written reports of wildlife sightings and interactions to KIVIA on a quarterly basis;*

b) *Submit a written report to KIVIA (and others as required by law) detailing any incident that results in the killing or relocation of any wildlife as a result of the Licensee's activities, immediately upon occurrence of the incident, together with compensation as follows:*

Polar Bear	*$20,000*
Grizzly Bear	*$10,000*
Caribou	*$2,500*
Musk oxen	*$2,500*
Wolf	*$2,500*
Wolverine	*$2,500*
Fox	*$1,000*

c) *Subject to law, deliver any valuable parts of wildlife killed as a result of the Licensee's activities to the HTO designated by KIVIA in a timely manner so as to preserve the quality of the wildlife parts."*

KIVIA LICENSE #KVL325C02 SCHEDULE B MOBILE CONSERVATION MEASURES

Schedule B of the Land Use License (KVL325C02) consists of mobile conservation measures (MCM) for wildlife to which WCGC must adhere (Appendix A). These measures include requirements for wildlife monitoring personnel, Project activities on IOL within designated calving grounds during specific times of the year, freshwater crossings, and aircraft flights.

Designated wildlife monitoring personnel will be present during periods when caribou are reasonably expected, in accordance with KivIA requirements

Wildlife Monitoring Personnel

Schedule B states

> *The Tenant* [Whale Cove Gold Corp.] *shall have wildlife monitoring personnel present at the Property during any season when caribou are reasonably expected to be present. The names of such personnel shall be sent to the Landlord, and they shall maintain communication at all reasonable times. The Tenant shall monitor and immediately report*

the presence of caribou to the Landlord in accordance with the following directives. The report shall specify the location and estimated numbers.

Caribou Monitoring and Mitigation

Triggers and requirements for monitoring and mitigation related to caribou from sections 1 through 10 in Schedule B are summarized in Table A-1.

TABLE A-1 SUMMARY OF MONITORING TRIGGERS AND MITIGATION ACTIONS FOR CARIBOU REQUIRED DEPENDENT ON AREA AND TIME OF YEAR

Area Type	Time of Year	Monitoring Trigger	Mitigation Actions
A. Designated Calving Grounds	Apr 16 – Apr 30	≥1 collared or ≥25 caribou within 50 km moving toward site	Monitor every 2 days within 5 km buffer
		≥25 caribou within 5 km	Daily monitoring; suspend all disturbing activities
	May 1 – July 15	N/A	No activities allowed unless authorized by KIVIA
	Aug 1 – Sep 30	≥1 collared or ≥25 caribou within 30 km	Monitor every 2 days within 5 km buffer
		≥25 caribou within 5 km	Daily monitoring; suspend all disturbing activities, including drilling, blasting, low-altitude flights, and ground ops
	Oct 1 – Apr 15	≥1 collared or ≥50 caribou within 30 km	Monitor every 2 days within 5 km buffer
		≥50 caribou within 2.5 km	Reduce above-ground activities and low-altitude flights
B. Other Seasonal Caribou Ranges	Apr 16 – May 31	≥1 collared or ≥25 caribou within 50 km moving toward site	Monitor every 2 days within 5 km buffer
		≥25 caribou within 5 km	Daily monitoring; suspend all disturbing activities
	Jun 1 – Jul 15	≥1 collared or ≥10 caribou within 50 km	Monitor every 2 days within 5 km buffer
		≥10 caribou within 5 km	Daily monitoring; suspend all disturbing activities
	Jul 16 – Sep 30	≥1 collared or ≥25 caribou within 30 km	Monitor every 2 days within 5 km buffer
		≥25 caribou within 5 km	Daily monitoring; suspend all disturbing activities

Area Type	Time of Year	Monitoring Trigger	Mitigation Actions
	Oct 1 – Apr 15	≥1 collared or ≥50 caribou within 30 km	Monitor every 2 days within 5 km buffer
		≥50 caribou within 2.5 km	Reduce above-ground activities and low-altitude flights
C. Freshwater Crossings	May 15 – Sep 30		Do not construct camps or other permanent structures within 10 km of designated caribou freshwater crossings
			Do not conduct blasting within 10 km of designated caribou freshwater crossings
		≥1 collared or ≥25 caribou within 25 km moving toward site	Monitor every 2 days within 5 km buffer
		≥50 caribou within 5 km	Daily monitoring; suspend all disturbing activities; remove non-essential personnel

Aircraft Mitigations

Section 10 states:

> *The Tenant shall ensure that aircraft (fixed-wing and helicopter) flights over occupied calving and post-calving areas shall be at least 610 m above ground level and avoid areas of known caribou concentrations (subject to pilot discretion regarding aircraft and human safety). In other seasons aircraft shall be at least 300 m above ground level.*

KIVIA PERMIT TERMS AND CONDITIONS

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LICENSE – TERMS AND CONDITIONS

Compliance

1. The Licensee shall comply with all applicable regulations, laws and orders of the federal, territorial or other governing body, and with the terms of this License, including its Schedules. The Licensee shall deliver to KIA a copy of any written notice of non-compliance received by the Licensee. The Licensee shall use the licensed lands only for the activities permitted by KIA.

2. The Licensee shall obtain and maintain such licenses, permits or approvals from the federal, territorial or other governing bodies as may be necessary to enable the Licensee to undertake the permitted activities on the lands. In particular, the Licensee shall obtain and maintain any applicable authorizations or approvals as may be required by the Nunavut Planning Commission, Nunavut Water Board, Nunavut Impact Review Board and/or the Nunavut Wildlife Management Board. Prior to issuing this License, KIA has made no inquiries and makes no representation as to whether or not the licensed activities require approval by any of those bodies. Upon request by KIA, the Licensee shall provide written evidence of compliance with this provision.

3. The Licensee shall permit KIA reasonable access to the licensed lands for the purpose of inspecting from time to time the condition of the lands and compliance with this License.

4. KIA has closed IOL's within calving grounds from May 1 to July 31, and allows activities after July 31 subject to guidelines which implement mobile conservation measures for wildlife. This License is subject to the mobile conservation measures attached as Schedule "B". Failure to comply may result in immediate termination of this License.

Fees

5. The Licensee shall pay all fees and other amounts required under this license on the first of each month, in advance and without abatement or deduction. Without prejudice to any other rights or remedies, KIA shall have the right to charge interest on overdue amounts at a rate equal to the prime rate established from time to time by the Bank of Canada, plus 2% per annum, calculated and compounded monthly.

6. If the Licensee continues its operations after the end of the term of this License without execution and delivery of a new license, the Licensee will be considered to be conducting its operations on a month to month basis at a monthly fee equal to 1/6th of the pro-rated annual fee and shall be subject to the covenants and conditions hereof.

7. If the Licensee continues in occupation of the licensed lands for the purpose of undertaking environmental remediation or reclamation or otherwise complying with this License but without otherwise continuing its operations, it shall nonetheless be required to pay the license fees stipulated herein and compliance with all other provisions hereof.

8. The Licensee shall pay any reasonable costs of all inspections that KIA deems necessary to monitor compliance with this License.

Insurance

9. The Licensee shall at all times during its occupation of the lands obtain and maintain insurance in such amounts and form acceptable to KIA. The insurance shall be enforceable by any party named as insured or additional insured thereunder and shall be primary to any other insurance available to KIA. The insurance shall not be subject to cancellation, reduction, amendment or non-renewal without at least thirty days advance written notice to KIA. Proof of insurance shall be provided prior to commencement of this License.

Damages & Indemnity

10. All persons and property of the Licensee or those for whom the Licensee is responsible at law shall be entirely at the risk of the Licensee and KIA shall have no liability for any loss or damage, unless caused by the negligence of KIA or those for whom KIA is responsible in law. Any damage or injury to lands, property or the environment caused by the Licensee or those for whom the Licensee is responsible at law shall immediately upon notice given either verbally or in writing by KIA, be repaired, rebuilt, replaced and restored by the Licensee to the entire satisfaction of KIA.

11. The Licensee shall at all times indemnify and save harmless KIA, its agents, contractors, employees, directors and members, from and against all claims and demands, loss, costs, damages, actions, suits or other proceedings by whomsoever made, based upon or attributable to this License or any actions taken or things done by the Licensee or those for whom the Licensee is responsible in law.

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Plans

12. The Licensee shall submit to the KIA for its approval, no later than September 30th in each year of the term, a Work Plan detailing the proposed operations on the licensed lands for the upcoming calendar year, together with an Environmental Action Plan detailing the Licensee's plans for reclamation of the licensed lands. Such Plans shall be subject to the approval of KIA and will be deemed to be incorporated into and form part of this License. Only those activities conducted pursuant to an approved Work Plan are permitted.

Assignment

13. The Licensee shall not assign or transfer this License without the prior written consent of KIA.

Default

14. Except as set out in Schedule "A", the Licensee shall have 30 days from the date of receipt of written notice identifying a default of any of its obligations hereunder to remedy such default, failing which KIA may, without prejudice to any other rights or remedies, cause to be performed any such obligations and all expenses incurred and expenditures in so doing, plus a sum equal to 15% thereof representing KIA's overhead, shall be treated as fees hereunder, payable immediately.

15. In the event that the Licensee fails to remedy any default within the time permitted under this License, this License may be terminated by KIA.

Security Deposit

16. The Licensee shall submit to KIA, upon execution of the License, a security deposit in accordance with Schedule "C". If the Licensee breaches any of the terms and conditions of this License and fails to remedy such breach within the time permitted, KIA may, without prejudice to any other rights, apply the security deposit to any loss, damage or costs caused by such breach.

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Voluntary Termination

17. This License may be cancelled by either party upon 90 days notice in writing to the other party.

19. All obligations of the Licensee for the payment of fees and other amounts hereunder and the Licensee's obligations with respect to the environment, shall survive the termination of this License.

Socio-Economic

20. The Licensee shall establish and implement with respect to the permitted activities under this License preferential practices designed to maximize the employment, training and economic opportunities for Inuit and Inuit firms of the Kivalliq Region. Such practices shall be in keeping with those which are required of the Licensee pursuant to the most recent Inuit Impact and Benefit Agreement entered into by the Licensee with respect to any other project undertaken by the Licensee in the Kivalliq Region.

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SCHEDULE "A"

General Standards.

1. The Licensee shall not conduct its operations on any lands not covered by this license.
2. The Licensee shall contact KIA at least 48 hours prior to the commencement of licensed activities.
3. The Licensee keep all combustible garbage and debris in a covered metal container until disposed of and shall burn all combustible garbage and debris in a suitable container. All non-combustible garbage and debris shall be removed to disposal location(s) approved by KIA.
4. All sewage shall be deposited into a sump or removed from the lands.
5. The Licensee shall not bury any metal wastes without the consent of KIA.
6. The Licensee shall locate all camps on gravel, sand or other durable land. No permanent structures shall be erected without the prior written consent of KIA.
7. The Licensee shall keep the lands clean of garbage and debris at all times.
8. The Licensee shall have available for viewing a summary of this license (in form and content acceptable to KIA) in a conspicuous place on the lands.
9. The Licensee shall give to KIA a final plan within 60 days of the expiry of this License, showing all areas within the lands actually used in its operation.
10. At the completion of its operations or expiry or termination of this License, the Licensee shall remove all buildings, equipment and materials placed or erected on the lands by or on behalf of the Licensee, unless otherwise authorized by KIA.
11. All archaeological site and burial grounds must be avoided and left undisturbed. Should a site be encountered, the Licensee shall have it flagged and reported immediately to KIA and CLEY.
12. The Licensee shall not use any equipment except of the type, size and number listed in the accepted application.

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Ground Disturbance

13. All operations shall be carried out so as to minimize surface disturbances.

14. All disturbed areas must be restored in a manner acceptable to KIA.

15. The Licensee shall not use surface vehicles to move drill rigs or other equipment or supplies without the prior authorization of KIA. The use of any vehicles off approved routes is prohibited.

Fuel and Chemical Storage

16. The Licensee shall not place any petroleum storage containers within 30 meters of the normal high water mark of any water body.

17. The Licensee shall not allow any petroleum or chemical products to spread to surrounding Lands or into water bodies

18. All petroleum brought onto the Property by or on behalf of the Licensee shall be kept in approved containers marked with the Licensee's name, or within a bermed area.

19. The Licensee shall report all spills immediately to KIA and appropriate governmental authorities.

20. The Licensee shall dispose of all combustible waste and waste products by incineration or removal.

Drilling

21. All drill fluids must be disposed of into a properly constructed sump or a naturally occurring, contained depression and drill fluids should be recycled wherever possible.

22. Drill sumps shall not be located within 30 metres of any water body unless otherwise authorized by KIA.

23. All drill sumps must be restored to the natural surrounding contours of the land prior to expiry of this license.

24. Disturbance of vegetation from deposit of drill fluids/cuttings shall be restricted to the area of the sump and the ground prepared for re-vegetation upon abandonment.

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Fisheries

25. The Licensee shall not deposit any deleterious substance into any water body.

26. The Licensee shall not cause any obstruction of any stream.

27. Winter stream crossings shall be removed prior to the expiry of this license or annual break-up, whichever occurs sooner.

Air Traffic

28. Where the licensee's approved Work Plan includes use of helicopters, the license is required to provide to KIA, in advance, the name of the operator, date and route of each flight. The licensee shall provide to KIA daily data detailing all helicopter activities, including flight altitudes.

Wildlife

29. In addition to complying with Schedule "B", the Licensee shall institute a wildlife sighting and incident program and will:

    a) submit written reports of wildlife sightings and interactions to KIA on a quarterly basis;

    b) submit a written report to KIA (and others as required by law) detailing any incident that results in the killing or relocation of any wildlife as result of the Licensee's activities, immediately upon occurrence of the incident, together with compensation as follows:

Polar Bear	$20,000
Grizzly Bear	$10, 000
Caribou	$2,500
Musk oxen	$2,500
Wolf	$2,500
Wolverine	$2,500
Fox	$1,000

    c) subject to law, deliver any valuable parts of wildlife killed as result of the Licensee's activities to the HTO designated by KIA in a timely manner so as to preserve the quality of the wildlife parts.

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Environmental

30. The Licensee shall not move any equipment or vehicles without prior testing the thickness of the ice to ensure the lake is in a state capable of fully supporting the equipment or vehicles.

31. The Licensee shall construct and maintain winter roads with a minimum of ten (10) centimeters of packed snow at all times during this land use operation.

Alcohol

32. Alcohol and non-prescription narcotics are strictly prohibited from being used transported, trafficked, exchanged, given, stored on or being in any way present on the licensed lands.

Carving Stone

33. If carving stone is discovered within the licensed lands, the Licensee shall clearly mark the occurrence, notify KIA and, if it is in an amount determined by KIA to be suitable for the exercise of Inuit rights under Article 19 of the Nunavut Land Claims Agreement, shall take reasonable steps to make such carving stone available to Inuit.

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Schedule "B"

MOBILE CONSERVATION MEASURES GUIDELINES

Introduction

The Tenant shall comply with the measures set out herein. The Tenant shall immediately report to the Landlord any deviation from these measures, including the reason for the deviation.

The Landlord reserves the right, based on the presence of caribou within the area of the Land in any year, to vary the dates set out herein and shall provide notice to the Tenant of any such variation.

Wildlife Monitoring Personnel

The Tenant shall have wildlife monitoring personnel present at the Property during any season when caribou are reasonably expected to be present. The names of such personnel shall be sent to the Landlord and they shall maintain communication at all reasonable times. The Tenant shall monitor and immediately report the presence of caribou to the Landlord in accordance with the following directives. The report shall specify the location and estimated numbers.

A. IOL within designated calving grounds

Section 1. On IOL within designated calving grounds (as designated by the Government of Nunavut) between May 1st and July 31st (the closure period):

1) No activities shall occur except as authorized by the Landlord.

Section 2. On IOL within designated calving grounds between August 1st and September 30th, the Tenant shall conduct monitoring and mitigation as follows:

2i) If collar data or observations indicate that there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within the thirty (30) km early warning zone from the boundary of the Property, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, remote camera surveys).

2ii) If monitoring indicates that there are twenty-five (25) or more caribou within five (5) km of the Property boundary, then the Tenant shall monitor within a five (5) km buffer zone around the Property on a daily basis, and shall immediately suspend work that has the potential to disturb caribou, including suspension of drill

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operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), suspension of all ground operations and camp closure, until caribou numbers are below the threshold within the buffer zone.

Section 3. On IOL within designated calving grounds between October 1st and April 15th, the Tenant shall conduct monitoring and mitigation as follows:

(3i) If collar data or observations indicate that there are one (1) or more collared caribou or fifty (50) or more caribou observed within thirty (30) km of the boundary of the Property, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, remote camera surveys).

(3ii) If monitoring indicates that there are fifty (50) or more caribou within two and a half (2.5) km of the Property, then the Tenant shall immediately reduce above-ground activities that have the potential to disturb caribou, including non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), until caribou numbers are below the threshold within the buffer zone.

Section 4. On IOL within designated calving grounds between April 16th and April 30th, the Tenant shall conduct monitoring and mitigation as follows:

(4i) If collar data or observations indicate that there are one (1) or more collared caribou or twenty-five (25) or more caribou within fifty (50) km of the boundary of the Property that appear to be moving in the direction of the activities, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, snow track counts (if appropriate), remote camera surveys).

(4ii) If monitoring indicates that there are an estimated twenty-five (25) or more caribou within the five (5) km buffer zone for the Property, then the Tenant shall conduct monitoring within a five (5) km buffer zone on a daily basis, and shall immediately suspend any activities that have the potential to disturb caribou, including suspension of drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), suspension of all ground operations, and camp closure, until caribou numbers are below the threshold within the buffer zone.

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B. IOL within other seasonal caribou ranges

Section 5. On IOL between June 1st and July 15th outside of designated calving grounds, the Tenant shall conduct monitoring and mitigation as follows:

(5i) If collar data or observations indicate that there are one (1) or more collared caribou or ten (10) or more caribou observed within the fifty (50) km early warning zone for the Property, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land, road surveys, snow track counts (if appropriate), remote camera surveys).

(5ii) If monitoring indicates that there are an estimated ten (10) or more caribou within the five (5) km buffer zone for the Property, then the Tenant shall conduct monitoring within a five (5) km buffer zone on a daily basis, and shall immediately suspend any activities that have the potential to disturb caribou, including suspension of drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), suspension of all ground operations and camp closure until caribou numbers are below the threshold within the buffer zone.

Section 6. On IOL between July 16th and September 30th outside of designated calving grounds, the Tenant shall conduct monitoring and mitigation as follows:

(6i) If collar data or observations indicate that there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within thirty (30) km of the Property, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, snow track counts (if appropriate), remote camera surveys).

(6ii) If monitoring indicates that there are twenty-five (25) or more caribou within five (5) km of the boundary of the Property, then the Tenant shall conduct monitoring within a five (5) km buffer zone on a daily basis, and shall immediately suspend any activities that have the potential to disturb caribou, including suspension of drill operations, blasting activities, non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), and camp closure until caribou numbers are below the threshold within the buffer zone.

Section 7. On IOL between October 1st and April 15th outside of designated calving grounds, the Tenant shall conduct monitoring and mitigation as follows:

(7i) If collar data or observations indicate that there are one (1) or more collared caribou or fifty (50) or more caribou observed within thirty (30) km of the boundary

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of the Property, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, remote camera surveys).

(7ii) If monitoring indicates that there are fifty (50) or more caribou within 2.5 km of the boundary of the Property, then the Tenant shall immediately reduce above-ground operations that have the potential to disturb caribou, including non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), and suspension of above ground operations, until caribou numbers are below the threshold within the buffer zone.

Section 8. On IOL between April 16th and May 31st, the Tenant shall conduct monitoring and mitigation as follows:

(8i) If collar data or observations indicate that there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within fifty (50) km of the boundary of the Property that appear to be moving in the direction of the activities, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, snow track counts (if appropriate), remote camera surveys).

(8ii) If monitoring indicates that there are an estimated twenty-five (25) or more caribou within the five (5) km buffer zone for the Property, then then the Tenant shall conduct monitoring within a five (5) km buffer zone on a daily basis, and shall immediately suspend any activities that have the potential to disturb caribou, including drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), suspension of all ground operations and camp closure, until caribou numbers are below the threshold within the buffer zone.

C. Freshwater crossings

Section 9. On IOL between May 15th and September 30th, the Tenant will not construct camps or other permanent structures or conduct blasting within ten (10) km of designated caribou freshwater water crossings. Exploration activities will not be permitted within five (5) km of water-crossings between May 15th and September 30th. Between May 15th and September 30th, the Tenant shall conduct monitoring and mitigation as follows:

(9i) If collar data or observations indicate that there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within twenty-five (25) km of the boundary of the Property that appear to be moving in the direction of the

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activities, then monitoring within a five (5) km buffer zone around the water crossing shall be conducted every second day (e.g., height of land surveys, remote camera surveys).

(9ii) If monitoring indicates that there are fifty (50) or more caribou within five (5) km of the boundary of the Property that appear to be moving in the direction of the water crossing, then the Tenant shall conduct monitoring within a five (5) km buffer zone on a daily basis, and shall immediately suspend any activities that have the potential to disturb caribou, including suspension of drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), suspension of all ground operations, camp closure, and removal of all non-essential personnel, until caribou numbers are below the threshold within the buffer zone.

D. Aircraft

Section 10. The Tenant shall ensure that aircraft (fixed-wing and helicopter) flights over occupied calving and post-calving areas shall be at least 610 m above ground level and avoid areas of known caribou concentrations (subject to pilot discretion regarding aircraft and human safety). In other seasons aircraft shall be at least 300 m above ground level.

CIRNAC LAND USE PERMIT #N2021C0005 CARIBOU CONSERVATION MEASURES

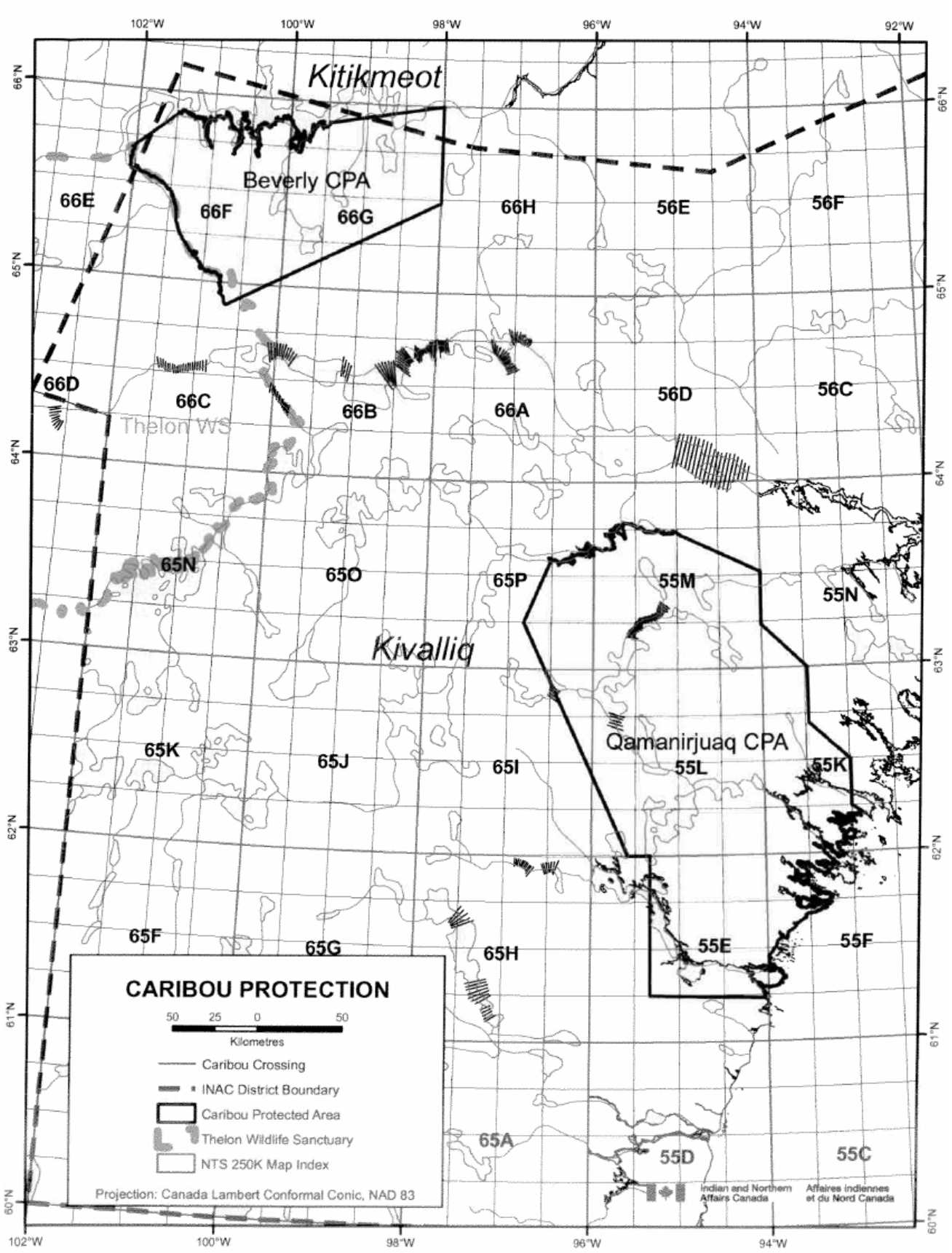
Keewatin Regional Land Use Plan
DIAND Caribou Protection Measures

1. (a) The Permittee shall not, without approval, conduct any activity between May 15 and July 15 within the Caribou Protection Areas depicted on the map certified by the Engineer as the "Caribou Protection Map" and annexed to this Land Use Permit.
   (b) A Permittee may, upon approval by the Land Use Inspector, operate within the said Caribou Protection Areas beyond the May 15 deadline set out in 1 (a), provided that, when monitoring information indicates that caribou cows are approaching the area of operation, the Permittee will implement 1 (c).
   (c) On cessation of activities pursuant to 1 (a) or 1 (b), the Permittee will remove from the zone all personnel who are not required for the maintenance and protection of the camp facilities and equipment, unless otherwise directed by the Land Use Inspector.
   (d) The Permittee may commence or resume activities prior to July 15 within those parts of the Caribou Protection Areas released by the Land Use Inspector for the reason that caribou cows are not expected to use those parts for calving or post-calving (note 1).

2. (a) In the event that caribou cows calve outside of the Caribou Protection Areas, the Permittee shall suspend operations within the area(s) occupied by cows and/or calves between May 15 and July 15.
   (b) In the event that caribou cows and calves are present, the permittee shall suspend:
      (i) blasting;
      (ii) overflights by aircraft at any altitude of less that 300 meters above ground level; and
      (iii) the use of snowmobiles and ATVs (all-terrain vehicles) outside the immediate vicinity of the camp.

3. (a) During migration of caribou, the Permittee shall not locate any operation so as to block or cause substantial diversion to migration.
   (b) The Permittee shall cease activities that may interfere with migration, such as airborne geophysics surveys or movement of equipment, until the migrating caribou have passed.

4. (a) The Permittee shall not, between May 15 and September 1, construct any camp, cache any fuel, or conduct any blasting within 10 kilometres of any "Designated Crossing" as outlined on the map certified by the Engineer as the "Caribou Protection Map" and annexed to this Land Use Permit.
   (b) The Permittee shall not, between May 15 and September 1, conduct any diamond drilling operation within 5 kilometres of any "Designated Crossing" as outlined on the map certified by the Engineer as the "Caribou Protection Map" and annexed to this Land Use Permit.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CARIBOU PROTECTION
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Kilometres
Caribou Crossing
INAC District Boundary
Caribou Protected Area
Thelon Wildlife Sanctuary
NTS 250K Map Index
Projection: Canada Lambert Conformal Conic, NAD 83
Indian and Northern Affairs Canada
Affaires indiennes et du Nord Canada