

Marathon Palladium Project

REVIEW PANEL AND CONSULTATION PROCESSES



Impact Assessment
Agency of Canada

Agence d'évaluation
d'impact du Canada

Canada

Impact Assessment Agency of Canada

- Formerly the Canadian Environmental Assessment Agency (CEAA)
- Delivers federal EAs and IAs pursuant to the Impact Assessment Act (IAA), which came into force on August 28, 2019, replacing the *Canadian Environmental Assessment Act, 2012* (CEAA, 2012)
- The Impact Assessment Agency (the Agency) is leading the joint assessment with the province of Ontario
- The Marathon Palladium Project (the Project) will continue to be assessed under CEAA 2012. The IAA's transition provisions allow projects undergoing an environmental assessments by review panel to continue under the former act.
 - As per the transition provision described in subsection 183 of the IAA: *“Any environmental assessment of a designated project referred to a review panel under section 38 of the 2012 Act before the day on which this Act comes into force is continued under the 2012 Act as if that Act had not been repealed.”*

History/Background

- October 2010: Project was referred to review panel due to the potential for the Project to cause significant adverse environmental effects
- August 9, 2011: The Joint Review Panel (the Panel) was established with Ontario
- July 2012: The Environmental Impact Statement (EIS) was submitted to the Panel. The Panel conducted its review of the EIS from July 2012 to December 2013, at which time the Panel determined it had sufficient information to proceed to a public hearing
- December 17, 2013: Public hearing was announced
- January 30, 2014: Proponent requested suspension of EA
- January 31, 2014: The Panel requested additional information from the Proponent and the regulatory clock was paused
- October 31, 2014: Joint Review Panel was disbanded and the EA was placed on hold
- October 9-23, 2020: Comment period on amended agreement to reestablish a Joint Review Panel for the Marathon Palladium Project
- November 16, 2020: Establishment of Joint Review Panel



Resuming the EA

- On July 13, 2020, the Proponent advised the Agency that it plans on submitting updated studies as early as December 2020
- Response to the previous Panel's Information Request (IR) is anticipated in the 1st quarter of 2021
- On November 16, 2020 the federal and provincial Ministers announced a new Joint Review Panel. The early appointment of the Panel will allow the necessary time to review the current material on the public registry (over 900 documents).
- The mandate and timelines of the Joint Review Panel is set out in the Terms of Reference. This document is in the process of being amended, a draft version is available on the Registry.
- The regulatory clock currently remains paused. The federal Minister of the Environment has already extended the 181 timeline by 90 days to 271 days for Joint Review Panel to complete its mandate
- The remaining steps of the environmental assessment for the Panel include:
 - Reviewing the amended EIS and updated studies;
 - Reviewing the response to the former Panel's IR;
 - Conducting a public comment period;
 - Conducting a hearing; and
 - Write its report.



Next Steps: Review of Updated Studies

- The updated studies and EIS addendum will be made available for public comment. Indigenous groups, the public, governments and other interested parties will be invited to provide comments on the sufficiency of the information (min. 60 days)
 - (what is required by the EIS Guidelines and on the technical merit of the information).
- After reviewing the information and any comments, the Joint Review Panel will determine if the EIS contains sufficient information to proceed to a public hearing (max. 30 days).
- If the Review Panel decides it does not have sufficient information it will request that from the proponent, and make any responses available for comment.
- If the Review Panel decides it has sufficient information, it will schedule the public hearing.



Next Steps: Public Hearing

- Notice of Public Hearing
 - A minimum of 45 days notice shall be provided prior to the start of the public hearing
 - The hearing is usually held in communities most affected by Project, but possibility for virtual hearings, based on public health advice at the time
 - The former Joint Review Panel developed procedures for the conduct of the public hearing, which are on the public registry. The new Joint Review Panel may choose to amend these procedures
- Best efforts to complete the hearing within 30 days



Next Steps: Panel Report

- The newly appointed Joint Review Panel will prepare and submit a report to the Minister of Environment and Climate Change and the provincial Minister of the Environment including:
 - Description of the joint review panel process
 - The rationale, conclusions and recommendations of the Panel
 - Any mitigation measures and follow-up programs required
 - Summary of the views of interveners and Indigenous groups
 - The Review Panel will submit its report to the federal and provincial Ministers at the earliest possible date, and within the overall time limit established under CEAA 2012.
- The Agency shall have the executive summary translated into Indigenous languages, upon request.



Next Steps: Federal Government Decision

- The federal Minister decides whether adverse environmental effects are likely to be significant
- If the Minister's decision is that the project is likely to cause significant adverse environmental effects, the matter is referred to the Governor in Council (Cabinet) who will decide if the likely significant adverse environmental effects are justified in the circumstances
- The federal Minister issues the environmental assessment decision statement with enforceable conditions, coordinated with the provincial decision statement, as required.



Registry

To access all documents on the public record for the Marathon Palladium Project, please visit: <https://iaac-aeic.gc.ca/050/evaluations/exploration?projDocs=54755>

Any new information submitted to the new Review Panel will be made available at the same link.



Role of the Crown Consultation Coordinator

The Role of the Impact Assessment Agency of Canada's Crown Consultation Coordinator includes but is not limited to:

- Consults Indigenous groups throughout the assessment process
- Collaborates with Indigenous groups on the assessment of impacts on rights
- Co-author the Crown Consultation and Accommodation Report to be presented to the Minister to inform decision making
- Coordinates federal departments involvement in consultation activities
- Coordinates with province in consultation activities
- Administers the Indigenous Funding Program
- Represents the Crown in its legal duty to consult, NOT part of the JRP Secretariat
- Upon request from the Joint Review Panel, provides information on the record to inform their analysis and recommendations



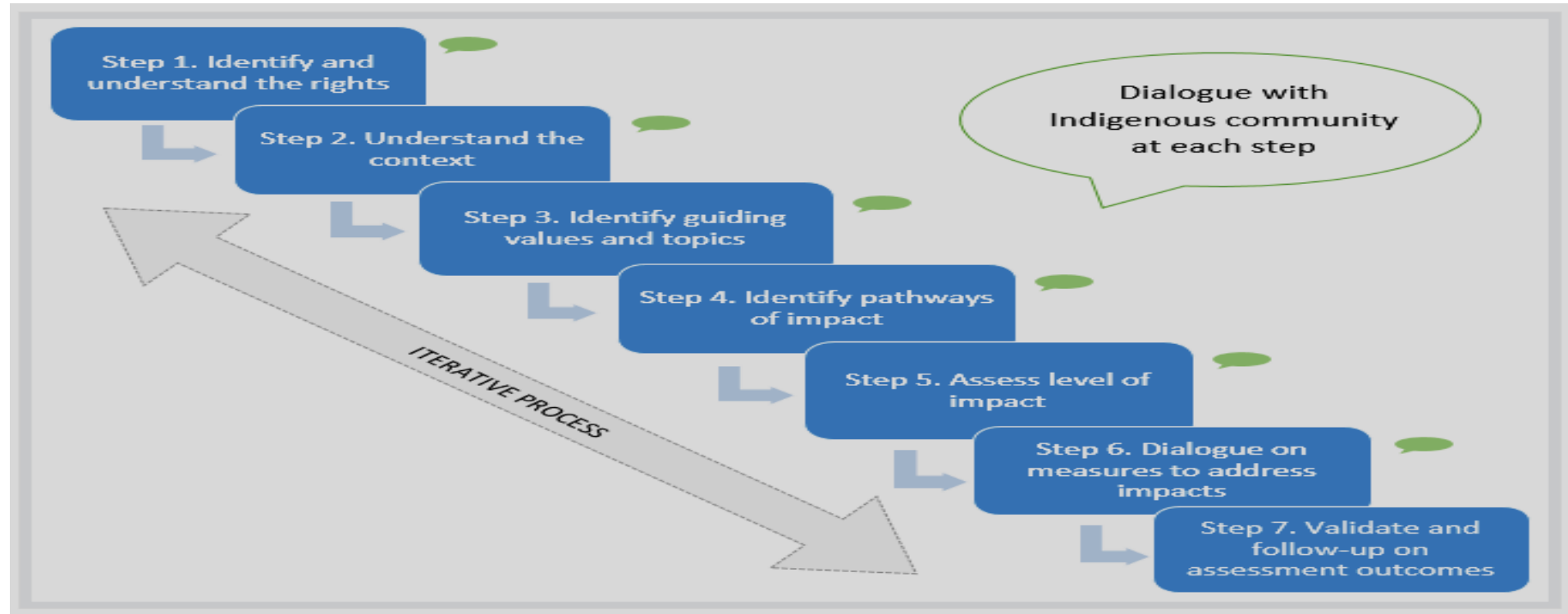
Updated Consultation Activities

	Consultation activities in the Joint Review Panel Process
Phase I	Initial engagement and consultation on the updated draft Joint Review Panel Agreement including Terms of Reference
Phase II	Review of proponent's updated technical studies, prepare for Joint Review Panel process leading to hearings
Phase III	Hearings and preliminary assessment of impacts on rights
Phase IV	Consultation on the Joint Review Panel EA Report, draft EA conditions for a federal Decision Statement, and finalization of Crown Consultation and Accommodation Report.
Phase V	Federal and provincial regulatory permitting

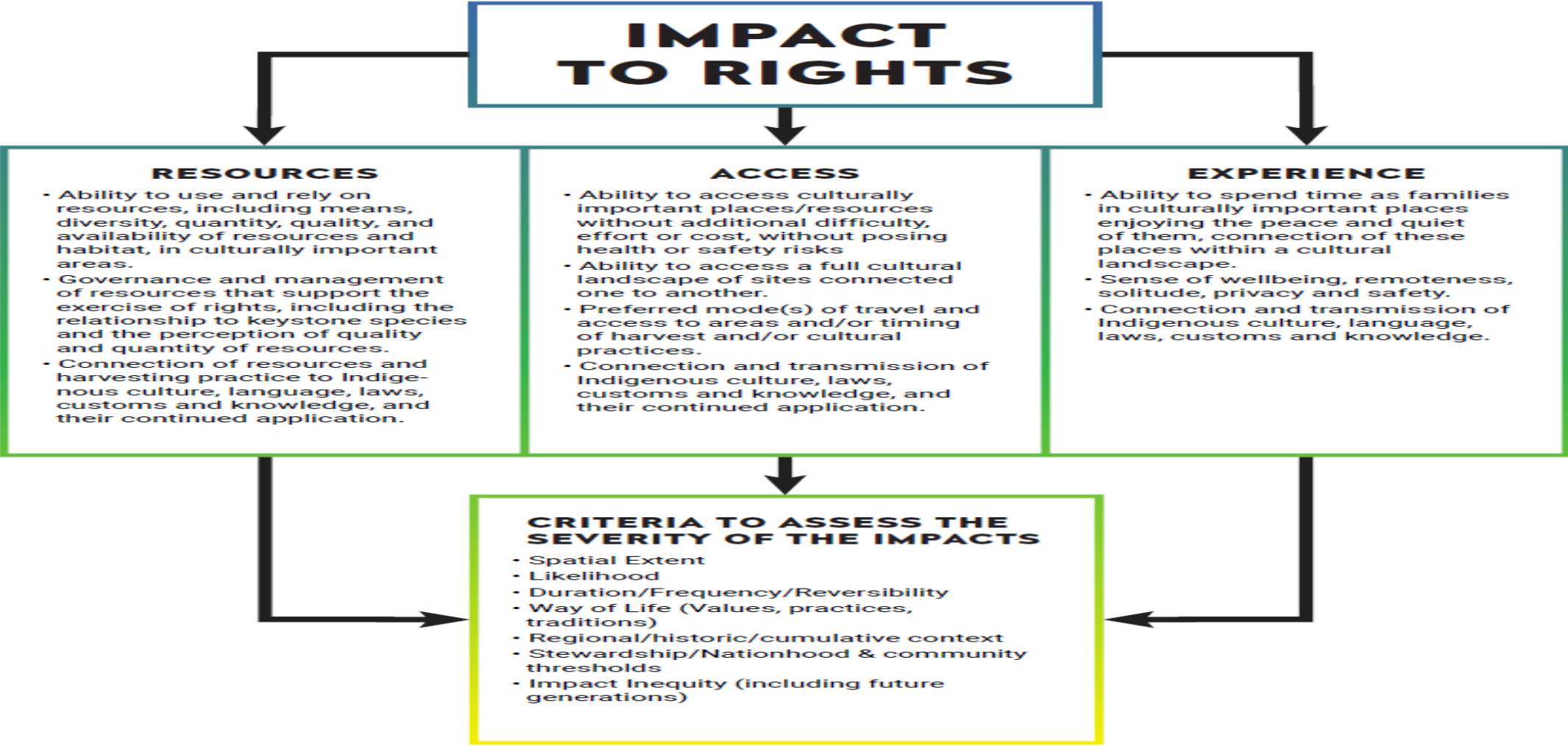


Agency Guidance – Assessment of Impacts on Rights

The Assessment of Impact on the rights of Indigenous peoples can be broken down into seven steps.



Methodology to Assess Severity of Impacts on Rights



Consultation – Next Steps

- Virtual meetings continue
- Possibility of face-to-face meetings with Indigenous groups in the Fall/Winter
- Consult Indigenous groups on updated Joint Review Panel Terms of Reference, Harmonization Agreement, updated technical studies as these become public documents
- Share and present *Interim Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples* and other guiding documents with Indigenous groups to begin discussions
- Prepare information packages to assist Indigenous groups participation in resumption of assessment process
- Collaborate on assessment of impacts on rights





Agency Contacts

Marathon Palladium Project
Joint Review Panel

Email: iaac.marathonminereview-examenminemarathon.aeic@canada.ca

Crown Consultation Coordinator
Jason Boisvert

<contact information removed>



Draft Meeting Agenda

MÉTIS NATION OF ONTARIO MEETING with the IMPACT ASSESSMENT AGENCY OF CANADA AND THE PROVINCE OF ONTARIO – PROPOSED MARATHON PALLADIUM MINE

Time and Location:

Thursday Jan 28, 2021
Microsoft Teams
10am-noon

Purpose and Objectives:

- Generation (proponent) – project updates
- Impact Assessment Agency of Canada (IAAC) and Province of Ontario - sharing environmental assessment process updates
- Overview of MNO rights in relation to the project
- IAAC presentation on the methodology to assess of impacts on the Rights of Indigenous Peoples
- Two-way sharing of issues and interests related to the Marathon Project

DRAFT Itinerary:

10:00- 10:15am	Introductions (All) IAAC (Jason Boisvert) overview of agenda and objective for the meetings as well as open the floor for any additions MNO would like on the agenda
10:15- 10:45am	Generation - Project updates and MNO questions IAAC and ON – Relevant process updates
Proponent Departs Meeting	
10:45- 11:15am	MNO – Overview of MNO history, interests and practice of rights in relation to project
11:15- 11:50am	IAAC (Jason Boisvert) overview of Agency’s methodology to assess severity of impacts on rights of Indigenous peoples – slides attached to email IAAC – Worksheets and Forms to assist in opportunity for MNO to bring forward information on rights and/or values to be assessed in the context of the proposed Marathon project. Examples of key questions: <ul style="list-style-type: none"> • MNO’s interest in co-developing or commenting on the Agency’s assessment of potential impacts on the rights in relation to this project and taking the pen on the Crown Consultation and Accommodation Report • Best approach to involve MNO members in the assessment, namely in COVID era Materials: Guidance found here: https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/guidance-assessment-potential-impacts-rights-indigenous-peoples.html
11:50-noon	Next steps, frequency of meetings, collaborating on assessment of proponents EIS, assessment of impacts on rights draft work plan

GENERATION PGM

January 2021- UPDATE

MARATHON PALLADIUM PROJECT



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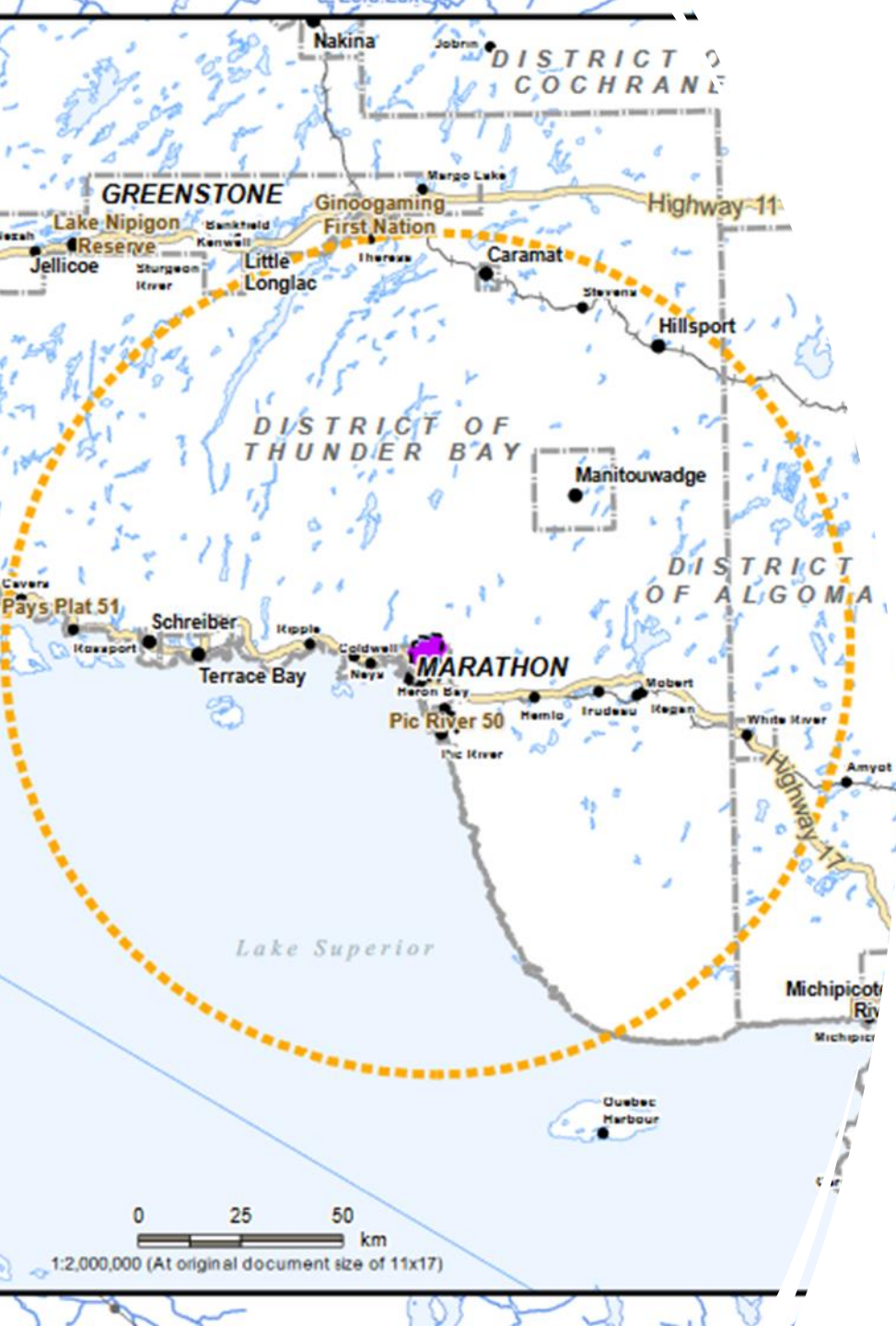


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- EIS Volume 1 submitted January 7, 2021
- EIS Volume 2 expected to be complete in roughly 5 weeks
- Volume 2 submission and re-start of regulatory clock

BASELINE REPORTS

- Chapter 4 includes updates to environmental studies
- Twelve baseline reports published on GenPGM website

1. Acoustic
2. Aquatic
3. Atmospheric
4. Cultural Heritage
5. Geology
6. Hydrology
7. Socioeconomics
8. Soils
9. Terrestrial
10. Transportation
11. Water Quality
12. Hydrogeology



Marathon Palladium
Project Environmental
Impact Statement
Addendum

VOLUME 1 OF 2

1.0 Background and Introduction

Prepared for:

GENERATION PGM

Prepared by:



Date: January 7, 2021
Environmental Assessment by Review Panel under CEAA 2012
Reference Number 54755

Volume 1 (submitted Jan. 2021)

- Ch 1 Introduction
- Ch 2 Project Scoping
- Ch 3 Project Alternatives
- Ch 4 Environmental Setting

Volume 2 (pending)

- Ch 5 Consultation – 85% complete
- Ch 6 Assessment of Impacts – 60% complete
- Ch 7 Environmental Management – Drafted
- Ch 8 Commitments - Drafted

MITIGATION MEASURES

- Gen PGM is dedicated to protecting Valued Ecosystem Components (VECs) in the Project area and region
- A series of management plans and mitigation measures are proposed
- Focus on minimizing risk and protecting water quality, fish, and species at risk.
- Indigenous community engagement is an integral part to planned environmental monitoring and investments
- Conceptual closure plan underway includes soils salvage and storage during stripping for reclamation purposes

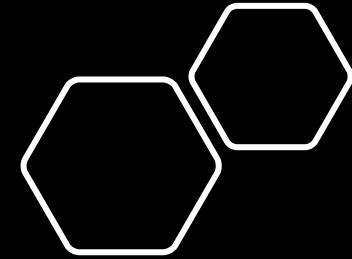
- **Waste and Recycling Material Management Program (WRMMP):** Intended to manage the non-hazardous and hazardous waste generated on the Project site
- **Emergency Preparedness Plan (EPP):** Intended to establish procedures and provide clear direction in case of an on-site emergency, including the identification of responsibilities of parties
- **Environmental Monitoring and Management Plans (EMMP):** Sets the practices and procedures that will be implemented to reduce potential adverse environmental effects of the Project and the corresponding follow-up and monitoring programs to test predictions made in the EIS and EIS Addendum and to demonstrate compliance with applicable permit and license standards.



Air and Noise	Monitoring Stations – dust, particulates, metals and sensitive receptors
Fish and Fish Habitat	Fish tissue sampling, sediments and benthics at receiving waters
Groundwater Quality and Quantity	Monitoring wells testing for levels, quality and focus on down gradient locations from PSMF and MRSA
Surface Water Quality and Quantity	Measurement of water quality and quantity will be conducted discharge locations; Records will include water level, flow gauging, depth and flow profiling and water quality sampling
Plants, Wildlife, Species at Risk	Surveillance monitoring will occur around the SSA to identify the presence, colonization and encroachment of invasive species, mitigation to reduce wildlife/site personnel interaction and reporting, nesting/bird surveys prior to harvest.

- Community review, questions and comments
- GenPGM Capacity Funding
- Draft Chapters 7 and 8 will be available on ftp for communities prior to submission to JRP
- Schedule regular Project updates

GENERATIONPGM



More Information on the Project can be found at

www.genmining.com

and the Impact Assessment Registry at

<https://iaac-aeic.gc.ca/050/evaluations/proj/54755?culture=en-CA>

**If you have additional questions,
please email us at comments@genpgm.com**

GENERATIONPGM

February 24, 2021

John Szura
Chief Executive Officer
Pays Plat First Nation
10 Central Place
Pays Plat, ON P0T 3C0

RE: Confirmation of Capacity Funding

Dear John,

Further to your letter dated February 16, 2021, and as a follow-up to the most recent Marathon Palladium Project Committee Meeting held on February 18, 2021, I would like to confirm that GenPGM will provide the \$70,000 in capacity funding requested by PPFN during the meeting. It is our understanding that the funds will be used to support the expert review of the Project Environmental Impact Statement Addendum by PPFN's engineering consulting firm Pinchin Ltd. To support our internal processes could you kindly provide a copy of Pinchin's scope of work and / or proposal along with an invoice for the \$70,000 in capacity funding to the GenPGM Environmental Team.

To facilitate the review, the GenPGM Environmental Team can provide Pinchin Ltd. with an overview of the Project and Joint Review Panel process, access to environmental reports and responses to questions, as required. The GenPGM Environmental Team can also support community consultation activities as requested by PPFN.

I would also like to confirm that GenPGM is interested in discussing a Process Agreement as proposed by PPFN. GenPGM is prepared to start discussions as soon as PPFN is ready and look forward to progressing towards a Community Benefits Agreement in the future. Thank you for your participation in the Project.

Respectfully,

<Original signed by>

Mr. Jamie Levy
Chief Executive Officer
Generation PGM Inc.
<email address removed>

MNO Region 2 Consultation Committee

Feb 2, 2021

Exploration and Marathon Project Update

Participants

MNO	Victoria Stinson, Mining Manager Jaqueline Barry, Consultation Adviser Tim Sinclair, Region 2 Councillor Trent Desaulnier, Superior Northshore President Phillip McGuire, Captain of the Hunt William Gordon, Greenstone President
Generation PGM	Tabatha LeBlanc (presenter), John McBride (presenter) Chanelle Boucher
Generation PGM Consultants	Cathryn Moffett

Meeting Summary

A Committee Meeting to give an update on the Marathon Project and planned exploration activities.

1. Project Update (Tabatha)

- Optimized 2020 project design from proposed 2014 project
- Modified discharge location to avoid important waterways
- Extended mine life by approximately 1 year
- Planned backfill of pits with mine rock to reduce footprint

2. Exploration Update (John)

- Overview of planned 2021 activities

3. EIS Process

- Discussion around TLU information
- MNO stated study should be updated

Follow Up: Finalize Letter of Intent to clarify milestones and commitments

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EXPLORATION UPDATE

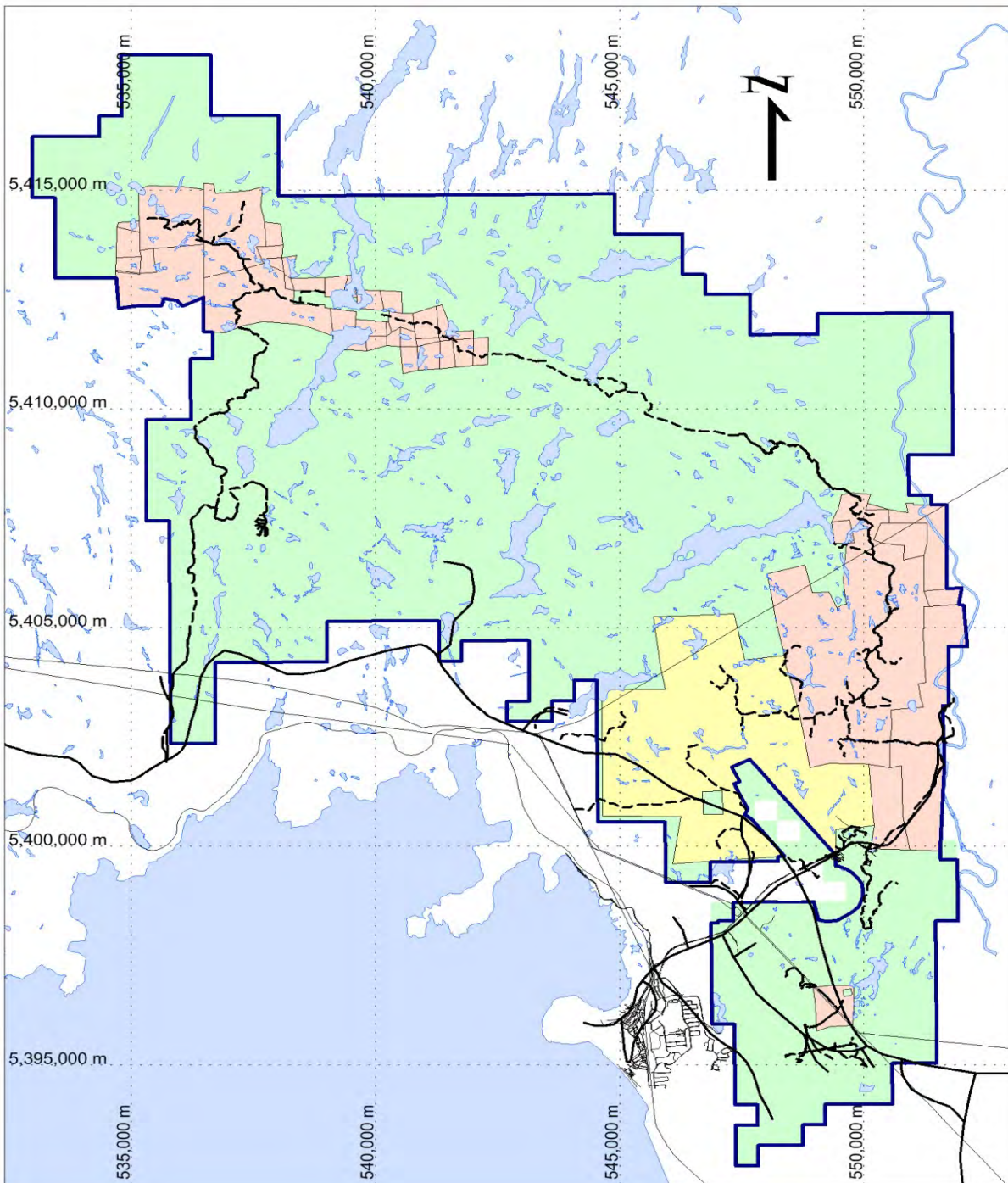


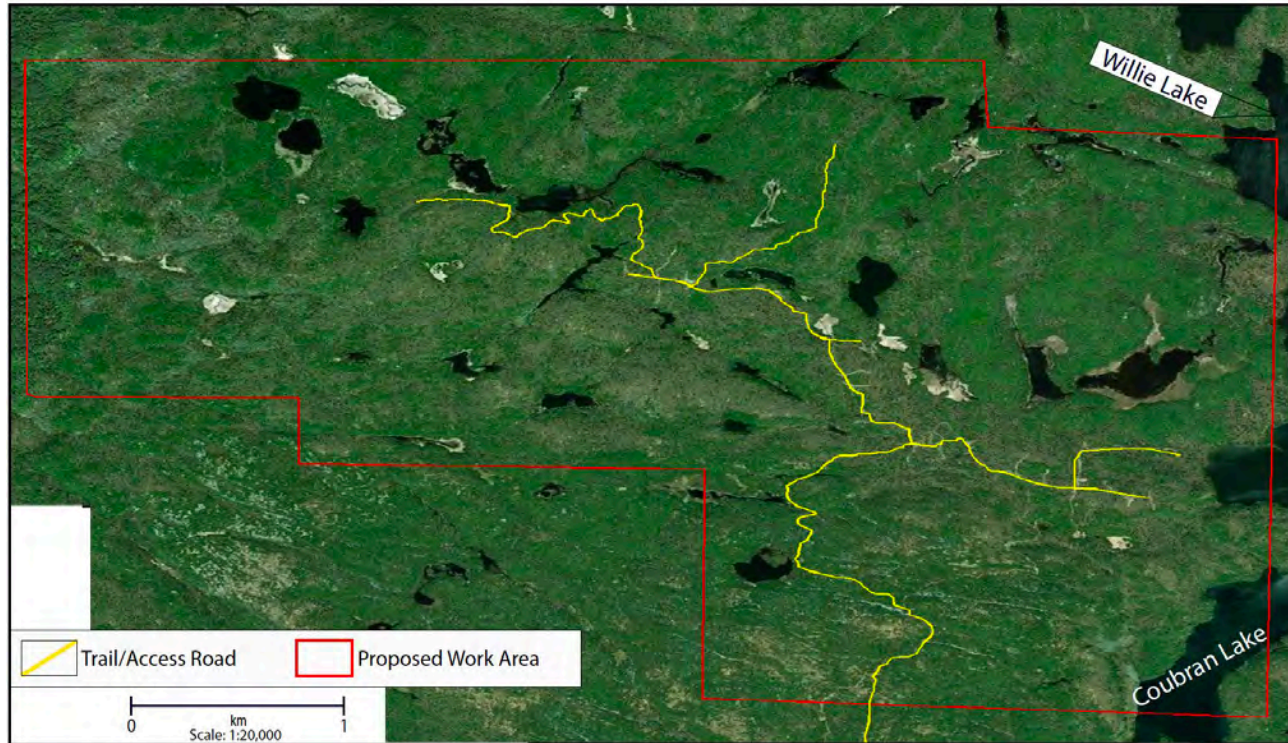
- Marathon PGM Property
 - Sally
 - Boyer
 - Marathon
- 2020 Work Program – complete
- 2021 Work Program – proposed
- Environmental Permitting
- Environmental Mitigation and Monitoring



MARATHON PGM PROPERTY

- Conversion of legacy claims to Lease CLM509 planned to be completed by 2021 (yellow)
- No other changes planned for the property boundary, claims or leases in 2021



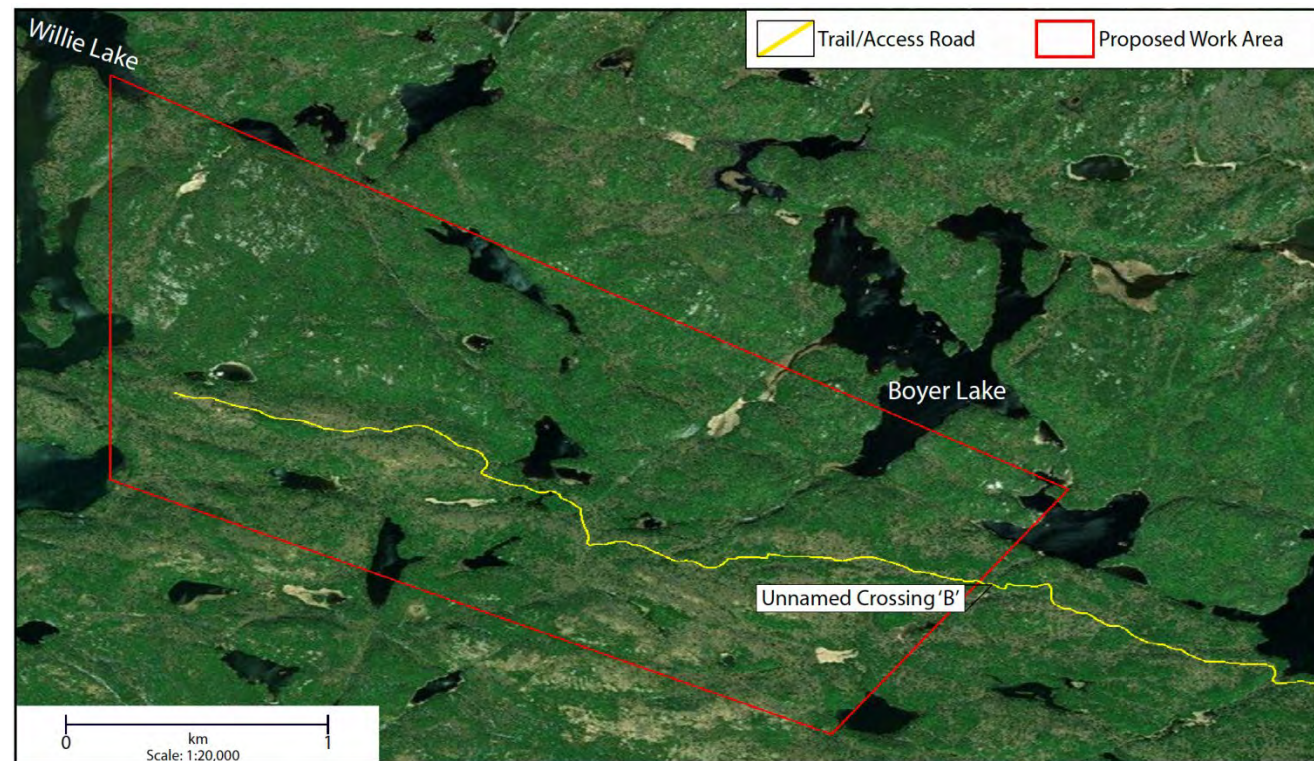


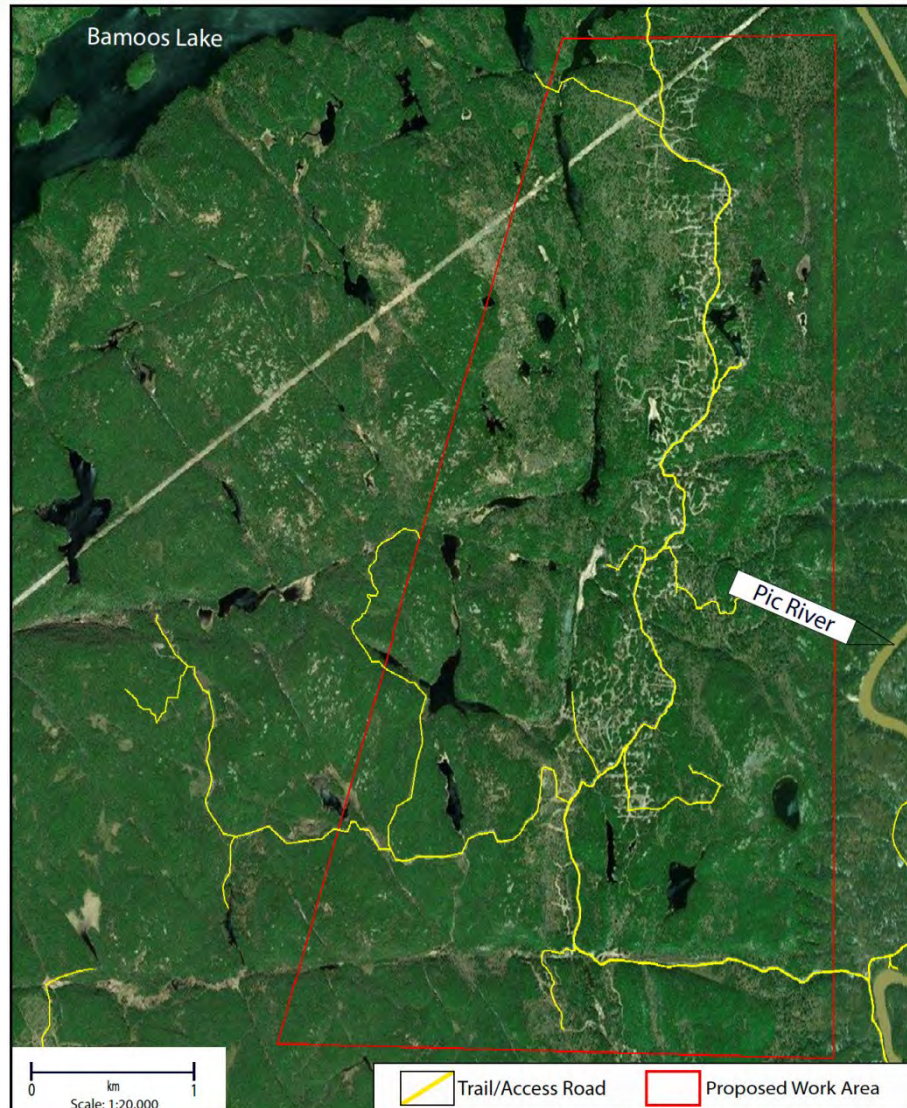
- Sally Deposit is located 15 km north west of the Marathon deposit and is accessed by the Geordie trail
- Includes a trail network (yellow)





- Boyer showing is located 11 km to the north west of the Marathon Deposit along the outer margin of the Complex
- Includes open areas from 2019





- The Marathon area north of the Marathon Airport and accessed from Camp 19 road, west of the Pic River
- Includes open areas from 2020



2020 WORK PROGRAM

Completed the 2020 exploration program in October

- Magnetotelluric geophysics at Marathon, Sally and Four Dams
- 5,000 m of diamond drilling at Marathon
- Surface mapping, prospecting and stripping at Marathon



All plans are tentative and subject to pending 2020 results, Board approvals and financing.

An update with specific 2021 exploration activities based on approvals will be provided in April 2021.

JOBS

- Exploration requires geologists, geotechnicians, core cutters and general labour
- Job postings are provided and community members are prioritized in hiring process

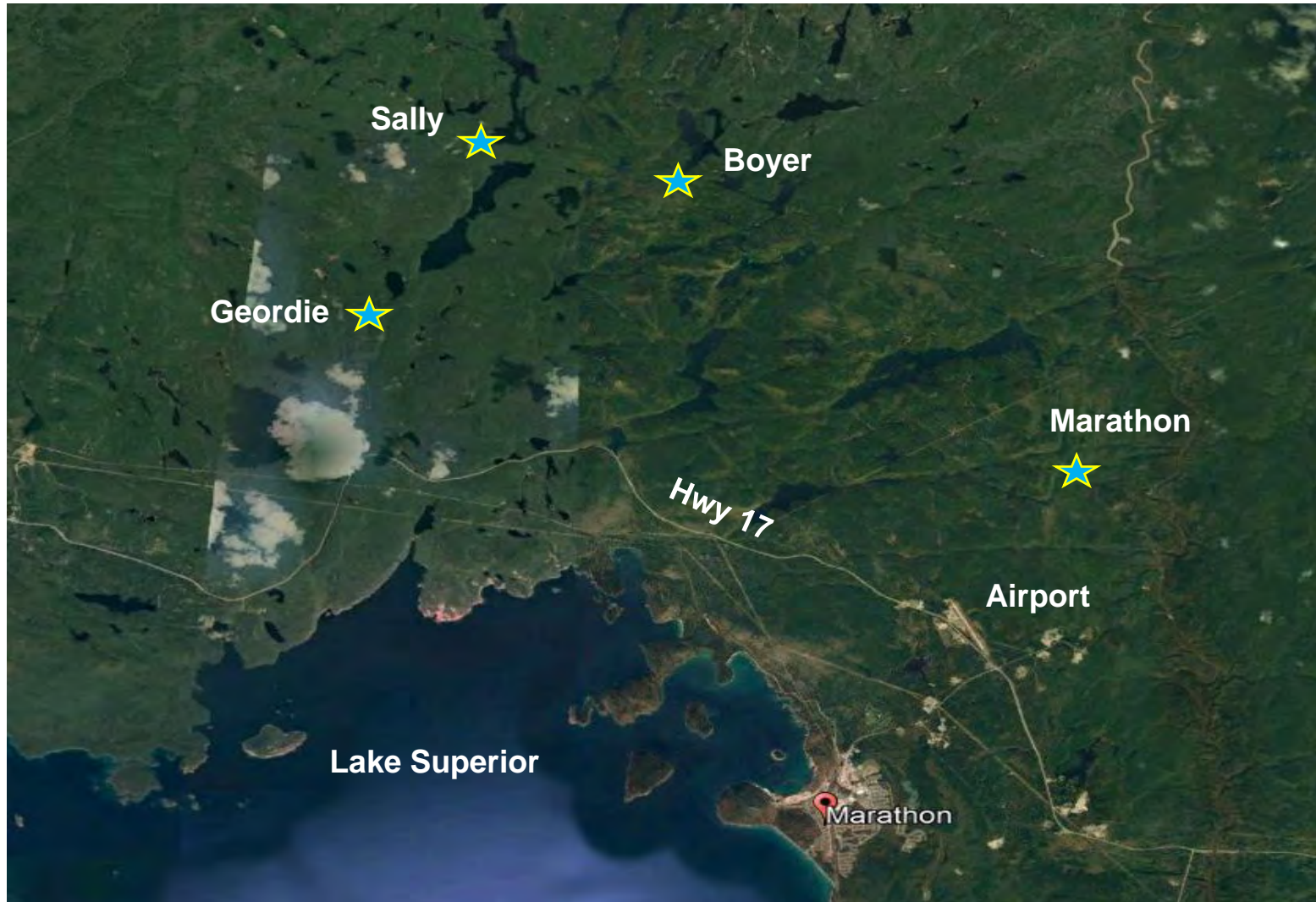
CONTRACTS:

- 2021 Contracts available
- Community contacts included in RFPs
- Indigenous ownership and JVs are prioritized

ENVIRONMENTAL REVIEW AND MONITORING

- Report sharing
- Meetings and community updates
- Direct participation in seasonal environmental monitoring and site inspections

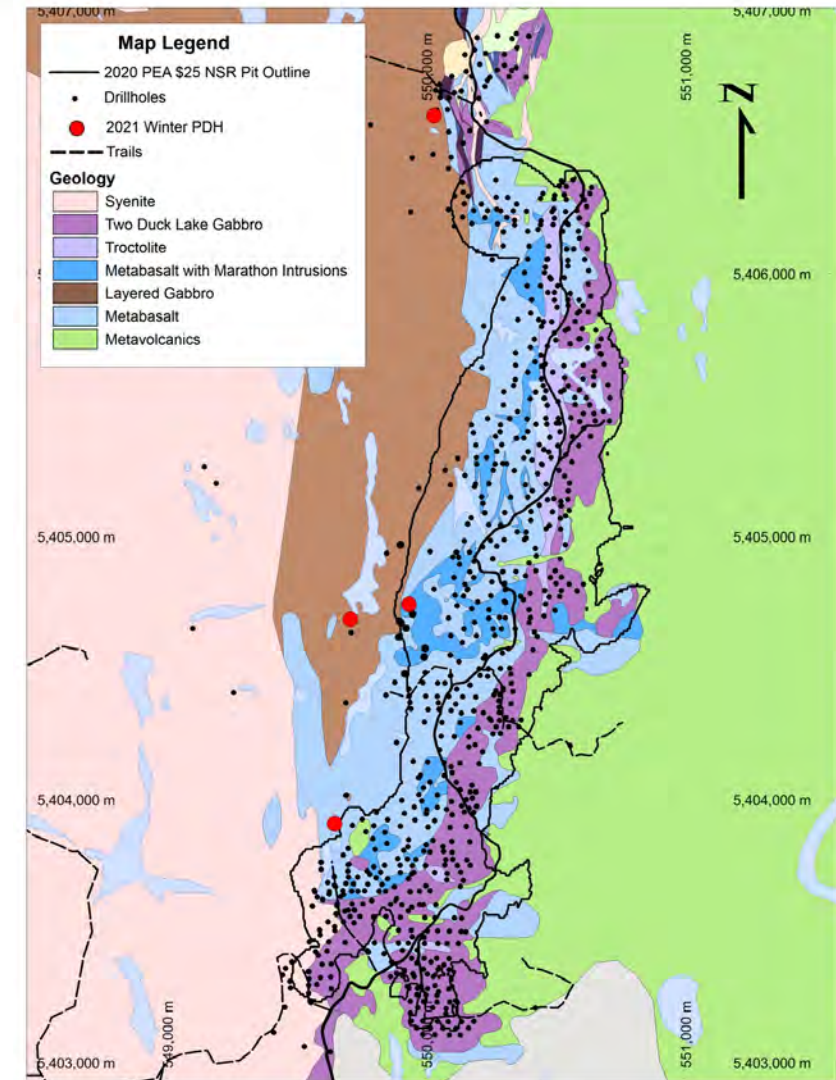
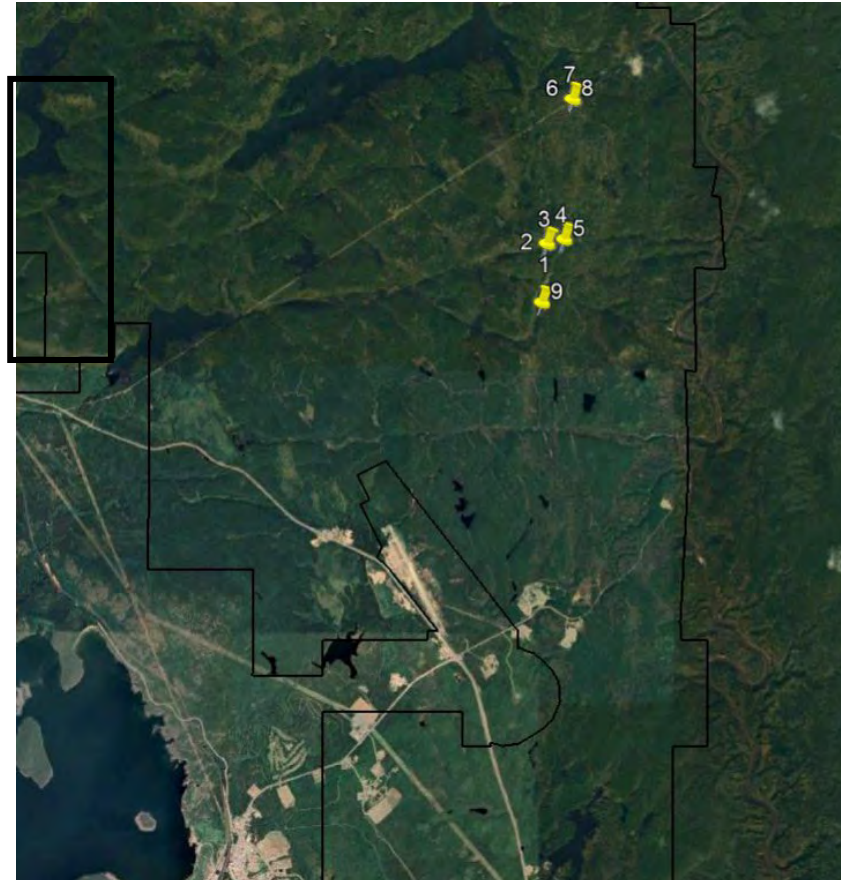




- Winter drill program is proposed for February - March
- Summer field activities are planned to begin in May and be completed by November
- One to three drills could be utilized to complete the exploration program
- Sally drilling would be helicopter supported but all other activities and locations would be accessed by ground using ATVs and UTVs

Marathon

- 3,500 m of diamond drilling
- 9 proposed holes
- 3 target areas



Sally

- Map and strip prospective areas east of the deposit
- Soil sampling program infilling underexplored area east of Sally
- Drilling the geophysical target and western extension
 - Borehole EM survey

Boyer

- Continue to surface field map and prospect for 2.5 km west of current showings.
 - Complete outcrop mapping/sampling from 2019

Marathon

- Complete outcrop mapping/sampling from 2020

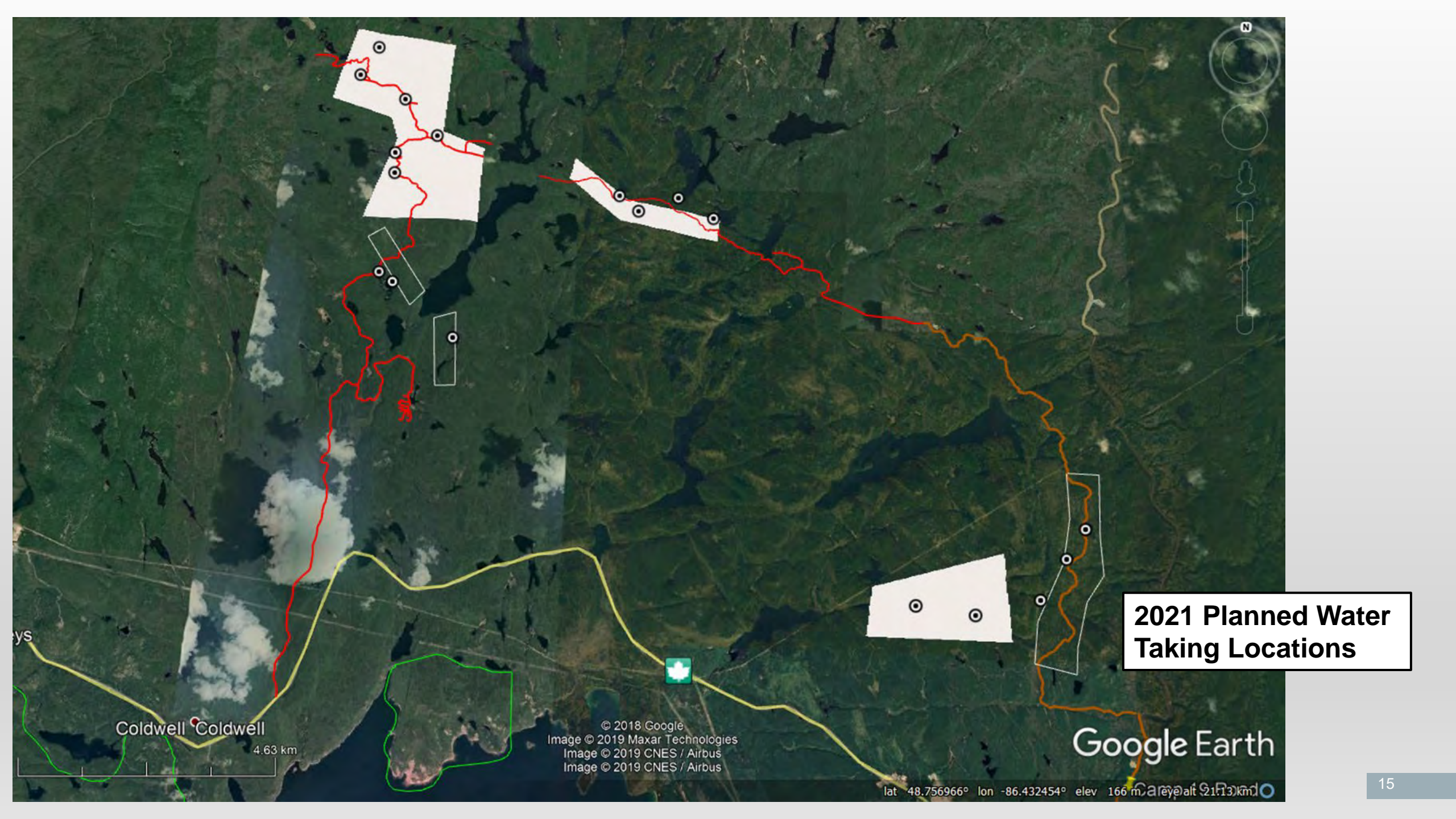
Blasting at Sally Deposit

- Geordie trail is currently impassible for UTV and heavy equipment and has become a safety concern.
- Due to the inaccessibility and lack of material near the area of concern a portion of outcrop will need to be leveled by blasting.
- The material will remain on site and be used in place to create a passible trail.
- The trail will continue to be only accessibly by ATV/UTV and heavy equipment.





- Four **Permits to Take Water** applications discussed in Jan. 2020 were filed with gov't but lost when pandemic declared. Gov't recently issued notice of application. They are for potential drill programs at exploration zones (Marathon, Boyer, Sally and Geordie). Up to 100,000L/day with an average of two drills working per zone at any one time
- Annual Authorization for equipment to ford streams where ATVs and low water crossings are in place in Boyer area.



2021 Planned Water Taking Locations

Google Earth

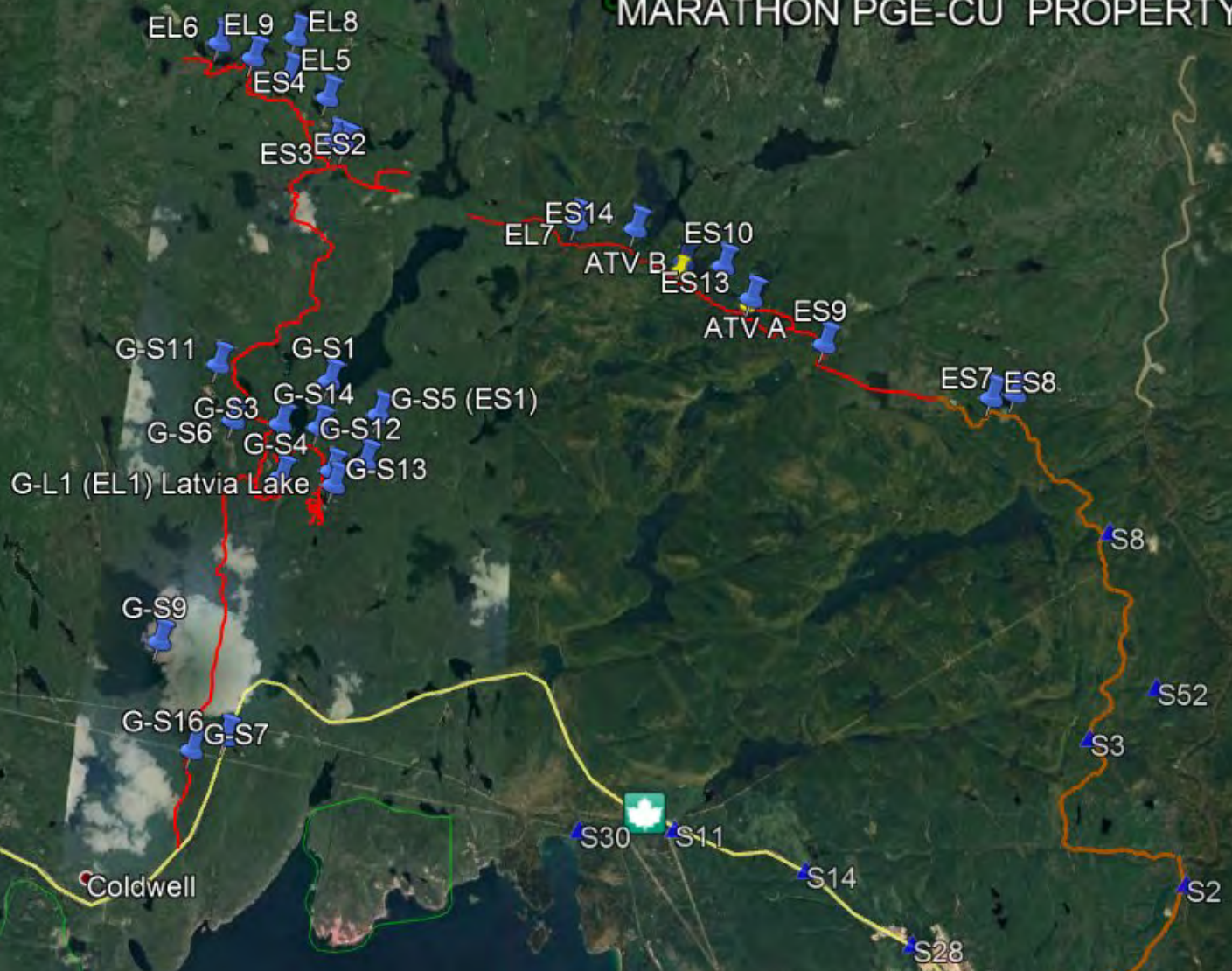
© 2018 Google
Image © 2019 Maxar Technologies
Image © 2019 CNES / Airbus
Image © 2019 CNES / Airbus

lat 48.756966° lon -86.432454° elev 166 m



- **Water Monitoring:** Flow stations installed at major watershed outlets (8 locations) and Boyer, Marathon and Sally exploration areas. Reduced program at Geordie zone.
- **Mitigation Plan:** PGM has put measures in place to minimize any impacts to endangered species including Woodland Caribou Habitat, Long-eared Bat and Little Brown Bat.
- **Environmental Site Inspections:** inspect trails, bridges, water crossings, aggregate pit and other aspects of property to ensure no degradation is occurring. Continue with some level of baseline studies (assists with monitoring site conditions).
- **Site Remediation:** Approximately \$15,000 annually to infill stripped areas, seed and remodel drill pads.

MARATHON PGE-CU PROPERTY



**2021
Sampling Locations**

- We continue to prepare for 2021 work programs, while monitoring latest developments around COVID-19 and financial markets.
- Please email <email address removed> or phone <contact information removed>

Thank you
Migwetch



GENERATION PGM

**MARATHON
PALLADIUM
PROJECT**



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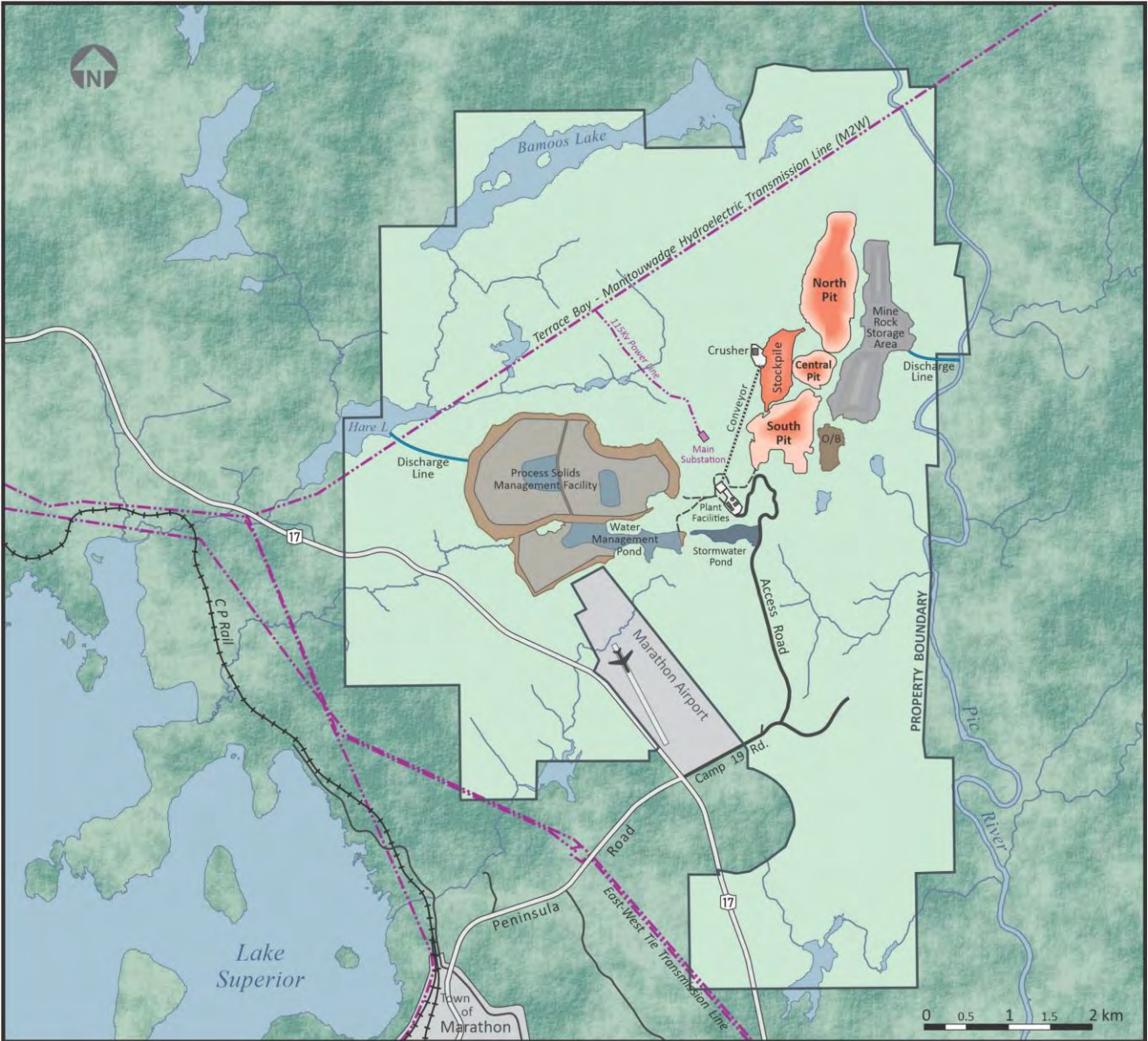
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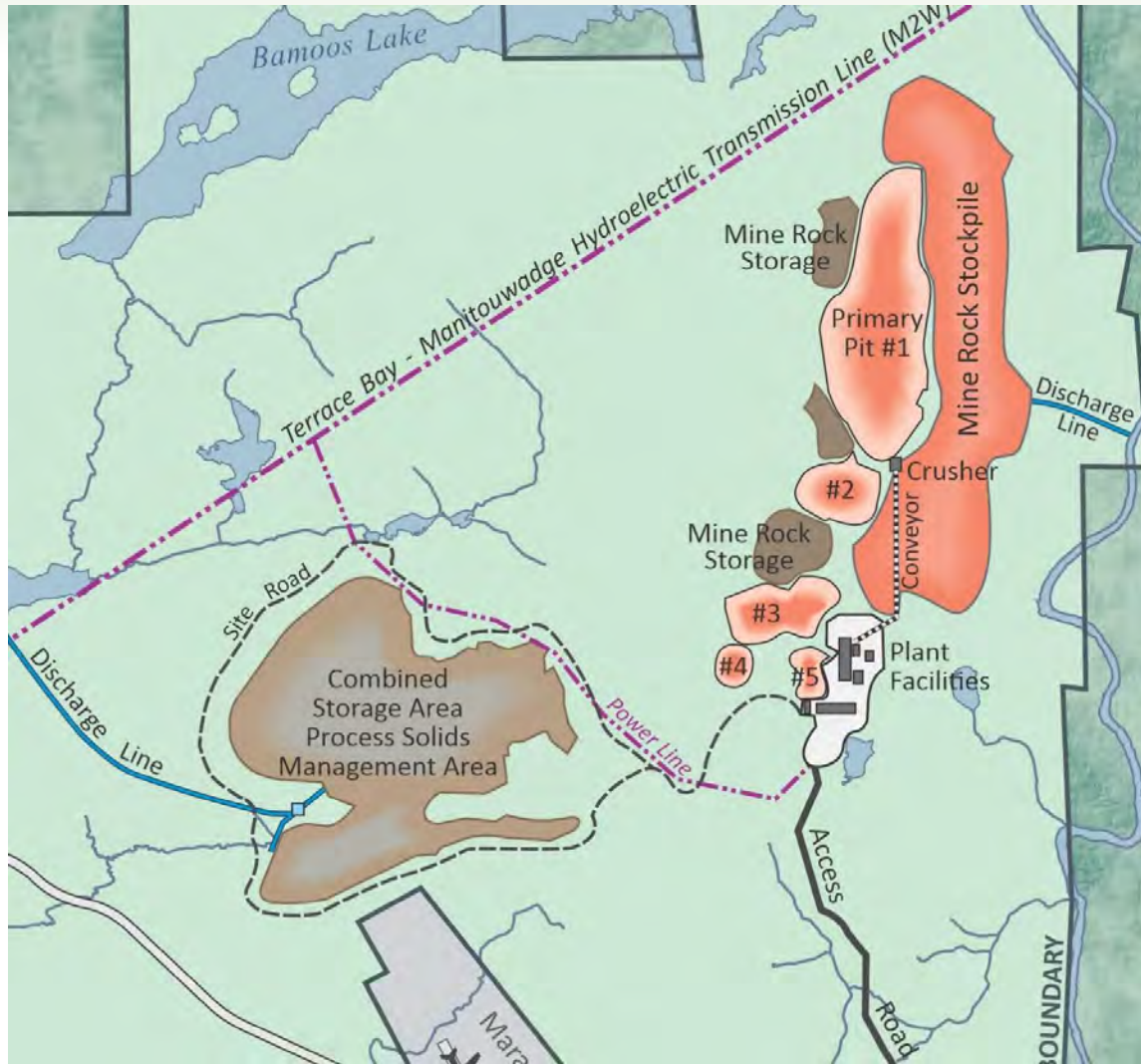
- Proposed open pit Palladium and Copper mine
- On site processing facility and mine rock storage
- Undergoing Environmental Assessment with Joint Panel Review
- Requires detailed environmental permitting:
 - Closure planning
 - Air emissions
 - Water discharge
 - Species at Risk
 - Fish Habitat
- Site construction will take 18 to 24 months
 - Construction workforce +900 workers
- Operations estimated to last 13 years
 - Operating workforce +450 people



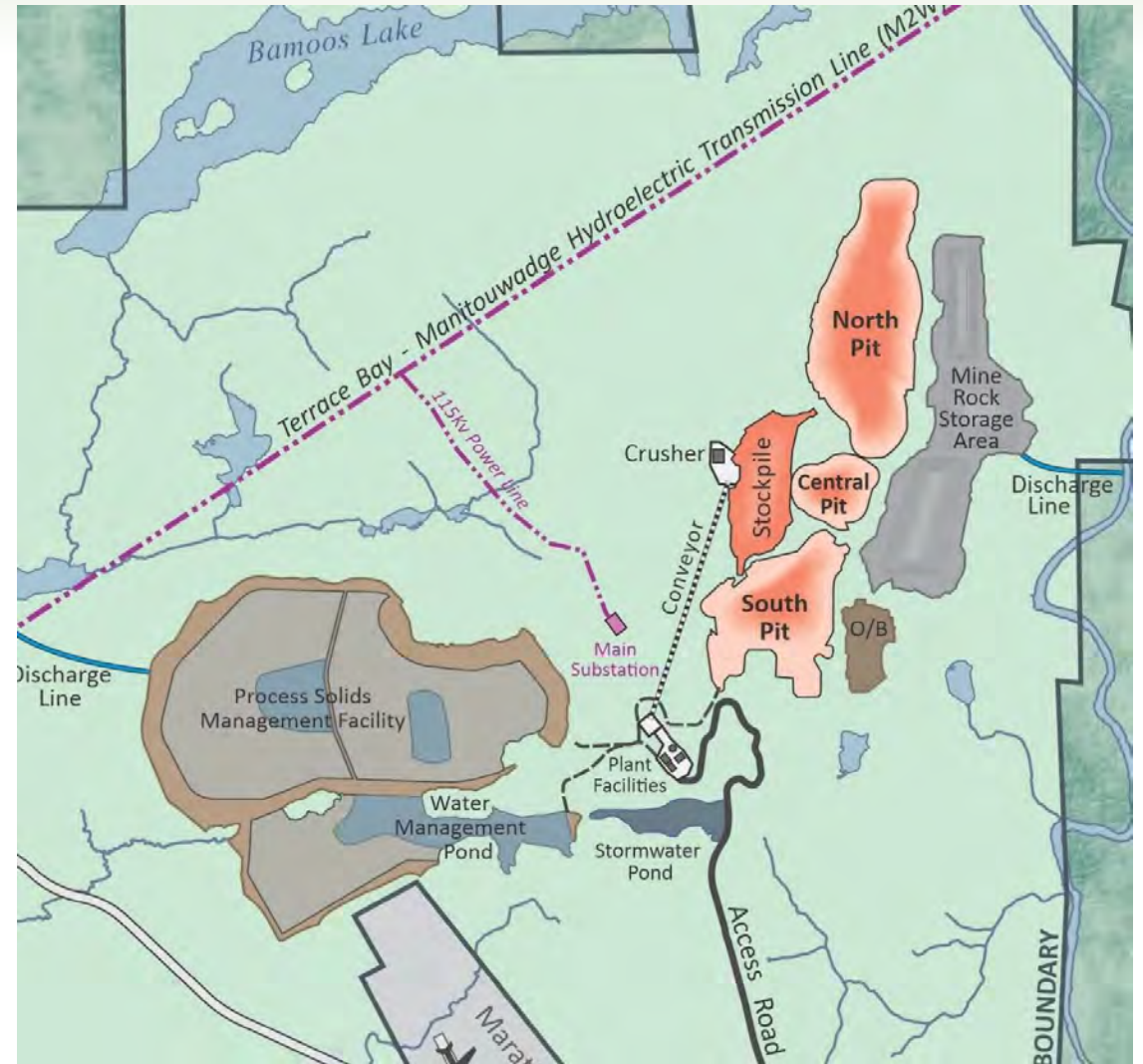
2020 Project Design

2014 PROJECT VERSUS 2020 OPTIMIZED DESIGN

GENERATION PGM



2014 Project Design



2020 Project Design

PROJECT TIMELINE

- Goal is to begin production in 2023
- Construction 18-24 months beginning in 2022
- Complete EIS and Joint Panel Review in 2021
- Environmental Permitting 2021-2023

	2019	2020	2021	2022	2023
PEA Study	Active	Active			
Feasibility Study		Active	Active		
EIS Report		Active	Active	Active	
Environmental Permitting			Active	Active	Active
Construction				Active	Active
Production					Active

* Important note: Construction and production are subject to favorable results in the feasibility study, permitting and financing of the project.

Volume 1 submitted Jan 2021

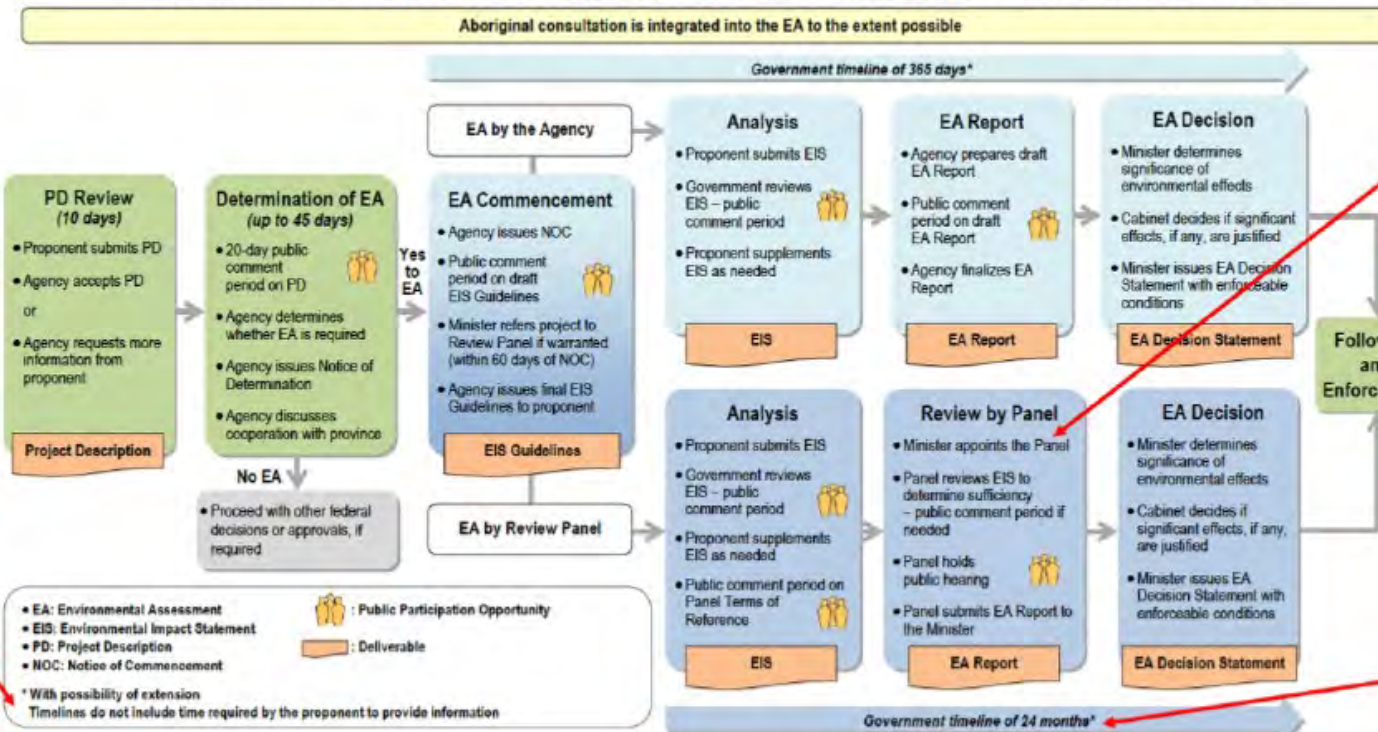
- Ch 1 Introduction
- Ch 2 Project Scoping
- Ch 3 Project Alternatives
- Ch 4 Environmental Setting

Volume 2 submission Feb 2021

- Ch 5 Consultation
- Ch 6 Assessment of Impacts
- Ch 7 Environmental Management
- Ch 8 Commitments



ENVIRONMENTAL ASSESSMENT PROCESS MANAGED BY THE AGENCY



Note: IAAC have already extended by 90d and any additional extensions need to go to Cabinet for approval

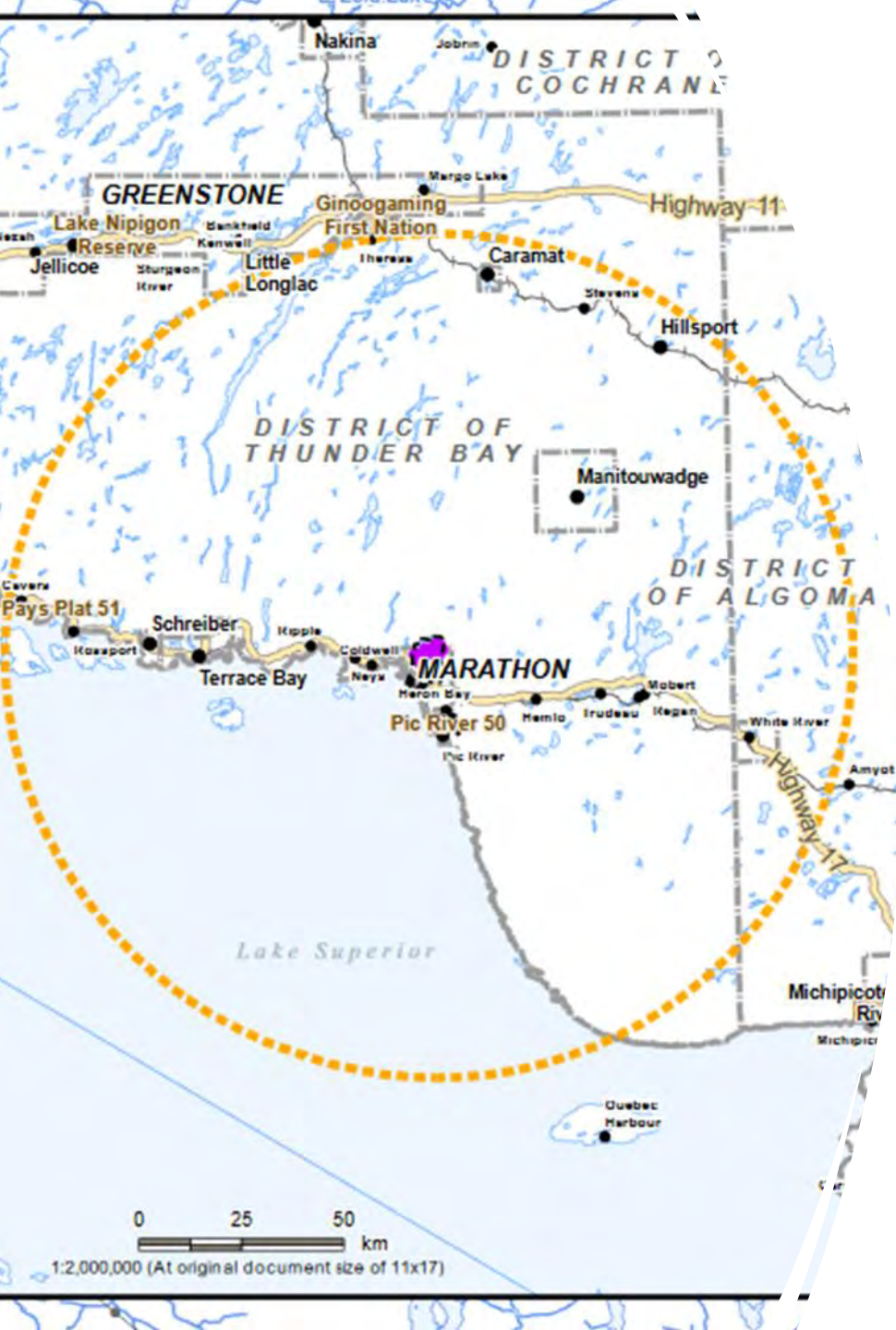
We Are Here

We have 271 days of the government clock remaining

BASELINE REPORTS

- Chapter 4 includes updates to environmental studies
- Twelve baseline reports published on GenPGM website

1. Acoustic
2. Aquatic
3. Atmospheric
4. Cultural Heritage
5. Geology
6. Hydrology
7. Socioeconomics
8. Soils
9. Terrestrial
10. Transportation
11. Water Quality
12. Hydrogeology





Marathon Palladium
Project Environmental
Impact Statement
Addendum

VOLUME 1 OF 2

1.0 Background and Introduction

Prepared for:

GENERATION PGM

Prepared by:



Ecometrix Environmental
INTELLIGENCE

**NORTHERN
BIOSCIENCE**
CONSULTING

kp Knight Piésold
CONSULTING

Date: January 7, 2021
Environmental Assessment by Review Panel under CEAA 2012
Reference Number 54755

Volume 1 (submitted Jan. 2021)

- Ch 1 Introduction
- Ch 2 Project Scoping
- Ch 3 Project Alternatives
- Ch 4 Environmental Setting

Volume 2 (pending)

- Ch 5 Consultation – 85% complete
- Ch 6 Assessment of Impacts – 60% complete
- Ch 7 Environmental Management – Drafted
- Ch 8 Commitments - Drafted

MITIGATION MEASURES

- Gen PGM is dedicated to protecting Valued Ecosystem Components (VECs) in the Project area and region
- A series of management plans and mitigation measures are proposed
- Focus on minimizing risk and protecting water quality, fish, and species at risk.
- Indigenous community engagement is an integral part to planned environmental monitoring and investments
- Conceptual closure plan underway includes soils salvage and storage during stripping for reclamation purposes

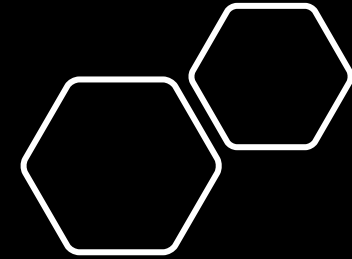
- **Waste and Recycling Material Management Program (WRMMP):** Intended to manage the non-hazardous and hazardous waste generated on the Project site
- **Emergency Preparedness Plan (EPP):** Intended to establish procedures and provide clear direction in case of an on-site emergency, including the identification of responsibilities of parties
- **Environmental Monitoring and Management Plans (EMMP):** Sets the practices and procedures that will be implemented to reduce potential adverse environmental effects of the Project and the corresponding follow-up and monitoring programs to test predictions made in the EIS and EIS Addendum and to demonstrate compliance with applicable permit and license standards.



Air and Noise	Monitoring Stations – dust, particulates, metals and sensitive receptors
Fish and Fish Habitat	Fish tissue sampling, sediments and benthics at receiving waters
Groundwater Quality and Quantity	Monitoring wells testing for levels, quality and focus on down gradient locations from PSMF and MRSA
Surface Water Quality and Quantity	Measurement of water quality and quantity will be conducted discharge locations; Records will include water level, flow gauging, depth and flow profiling and water quality sampling
Plants, Wildlife, Species at Risk	Surveillance monitoring will occur around the SSA to identify the presence, colonization and encroachment of invasive species, mitigation to reduce wildlife/site personnel interaction and reporting, nesting/bird surveys prior to harvest.

- Community review, questions and comments
- GenPGM Capacity Funding
- Draft Chapters 7 and 8 will be available on ftp for communities prior to submission to JRP
- Schedule regular Project updates

GENERATIONPGM



More Information on the Project can be found at

www.genmining.com

and the Impact Assessment Registry at

<https://iaac-aeic.gc.ca/050/evaluations/proj/54755?culture=en-CA>

**If you have additional questions,
please email us at comments@genpgm.com**

GENERATION PGM

February 2021

Project Update and EIS Overview

MARATHON PALLADIUM PROJECT

Michipicoten FN and Regulators

Virtual Meeting



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AGENDA

- Introduction
- Indigenous Relations
- Need for the Project
- Project Overview
- Project Timeline
- Environmental Assessment and Joint Review Panel



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- The Project is an 80:20 Joint Venture between Generation Mining and Sibanye Stillwater
- GenPGM is made up of a small and experienced management team with backgrounds in building, development and operations
- Positive Preliminary Economic Assessment
January 2020
- EIS Addendum planned for submission
February 2021



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- Respect the rights of Indigenous Peoples to maintain their culture and identity
- Build positive relationships through meaningful engagement and collaborative processes
- Seek inclusive, transparent, respectful, and meaningful dialogue
- Maximize social and economic benefits and opportunities
- Seek direct community participation in environmental projects
- Ensure oversight from the Board and Executive leadership



Palladium: Ontario's Supply Advantage

Palladium's market value has greatly appreciated due to its critical role in auto manufacturing and vehicle exhaust systems, where it helps transform poisonous gases into less toxic and harmful outputs

- I. Insufficient global palladium supply exists
- II. Canada's platinum-group metals (including palladium) are concentrated Northern Ontario
- III. Expanding palladium production could revitalize Northern Ontario's economy

Marathon Project represents a vital strategic asset for a competitive Ontario economy and instrumental in the transition towards renewable energy and green technologies

Copper: Essential to Vital Technology

Copper is a key metal for many innovative technologies and a necessary component in the production of electric vehicles



Electric Vehicles

A reliable supply of copper will be vital to the success of the recently announced upgrade to Ford's Oakville EV plant



Telecomm



Industrial Tech



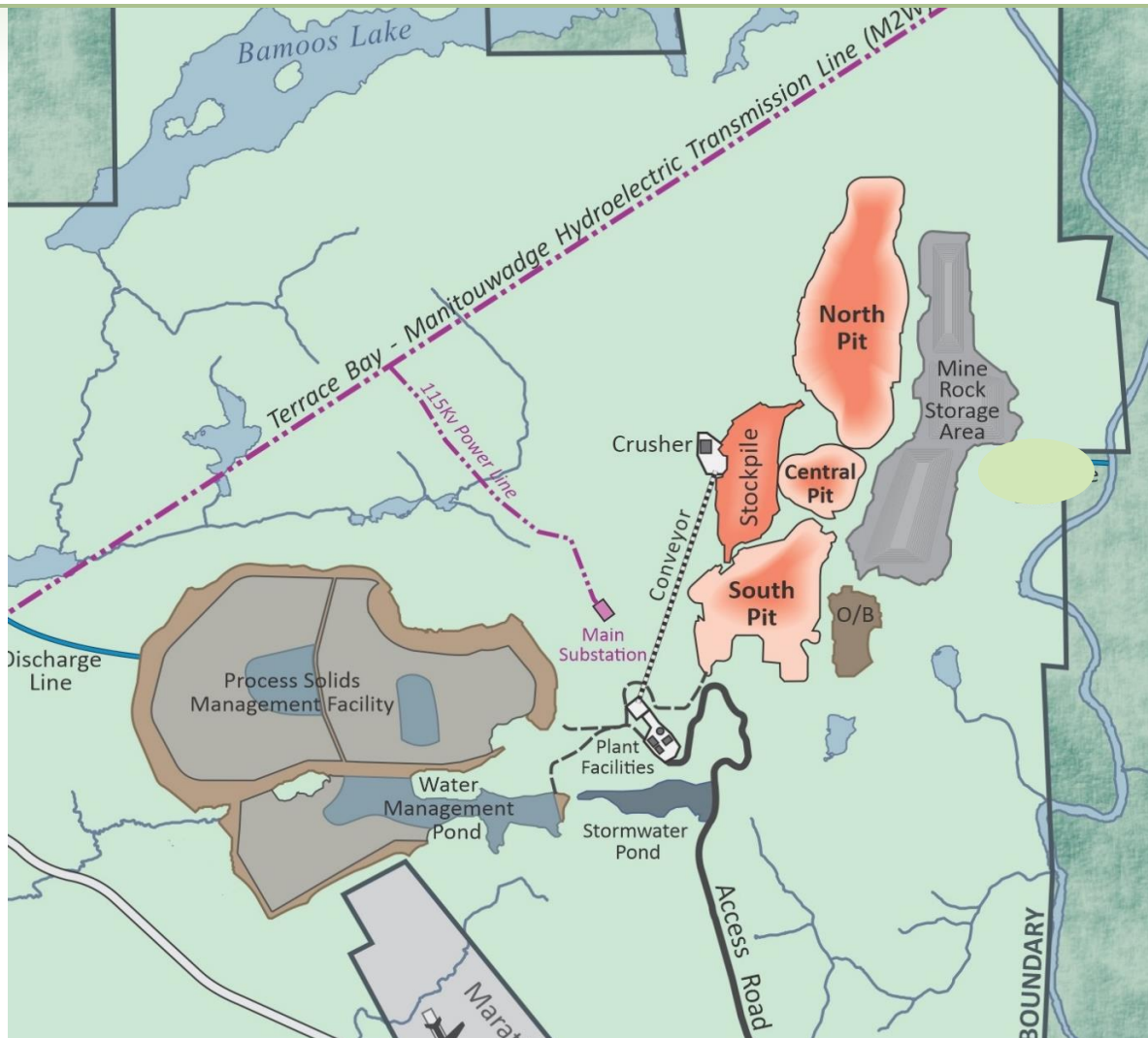
LED lightbulbs



Smart Grids



- The open pit ore will be processed (crushed, ground and concentrated) at an on-site processing facility.
- Final concentrates containing Palladium and Copper will be transported off-site via road and/or rail to a smelter and refinery for extraction and purification
- Site construction will take 18 to 24 months
- Construction workforce will require +900 workers with an average of approximately 450 to 500 people
- Production is estimated to begin late 2023
- Operating workforce estimated at +375 people
- The mine has been designed to ensure that the environment will be protected with specific attention to water, air and species at risk



Proposed Project Footprint

- Three planned open pits (central, north and south)
 - Measured and indicated resources 179.2 M tonnes
 - PSMF, water management ponds and stockpiles
- Mine rock storage area
 - 85-90% non-acid generating mine rock
 - Long term PAG storage in PSMF and open pits
- Process plant facility
 - 25,200 tonnes per day
- 2.2 km of new transmission line
- 2.5 km of new access road
- Excess water will be treated and discharged to Hare Lake

Water Management and Recycling

- Site access road realigned to cross fewer streams
- Process Plant moved out of Pic River watershed, no planned discharge due to re-use
- Water quality monitoring network includes 70 surface water and 50 groundwater locations
- Mine rock stockpile discharge into Hare Lake includes diffuser and ability to treat

Greenhouse Gases and Climate Change

- Mine layout designed to minimize fuel usage
- Trolley Assist being considered for key haulage segments
- Power efficient equipment included in the Processing Plant design
- Evaluating carbon capture alternatives to lower emissions intensity

Species at Risk and Compensation Planning

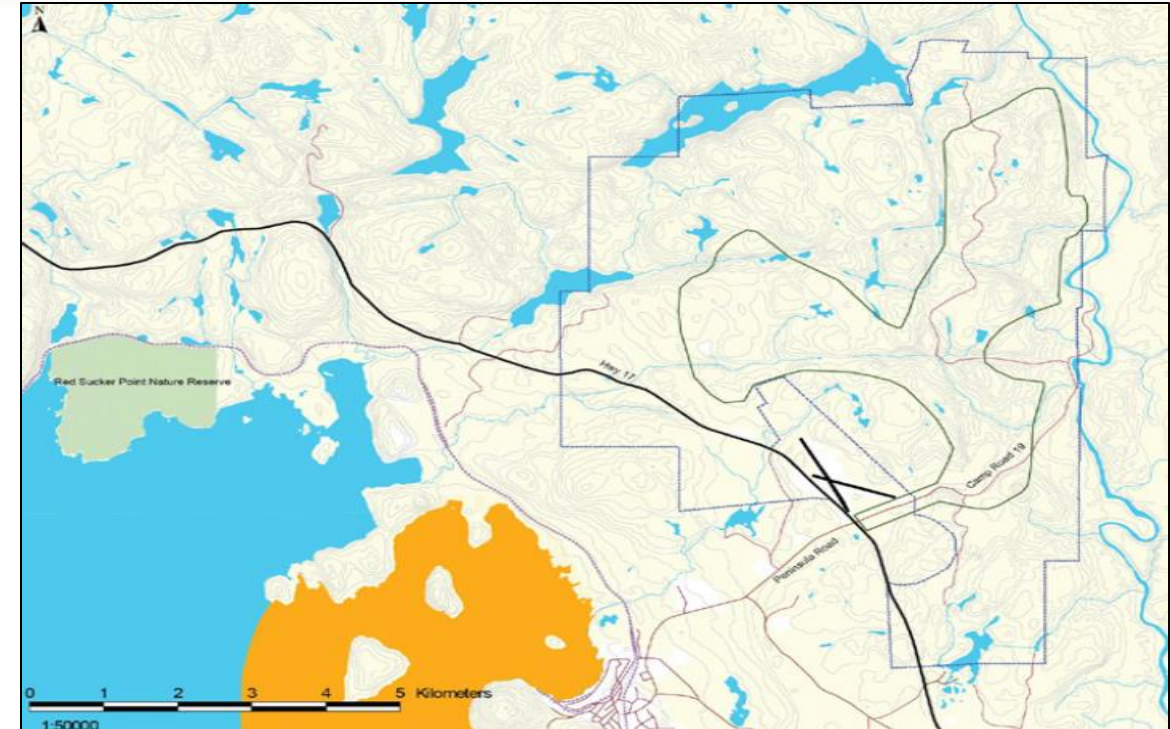
- Site includes caribou habitat as well as important fish, bats, birds and insects
- Existing caribou mitigation strategy in place for exploration activities
- Overall Benefit Plan for caribou currently in draft, including proposed road restoration
- Actively collaborating with communities on environmental values and projects

TIMELINE (ESTIMATED)

	2019	2020	2021	2022	2023
Asset Acquisition	✓				
Update Resource	✓				
PEA Study	✓	✓			
New Listing		✓			
Feasibility Study		✓			
EA/Permits/Social		✓	★ Complete EIS and Start JRP		
Detailed Engineering					
Mine Financing					
Construction				★ Start Construction: 2022 (18mo)	
Production				Commissioning / Commence Production: 2023 ★ >	

* Important note: Construction and production are subject to favorable results in the feasibility study, permitting and financing of the project.

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- Key elements include: management of water, protecting wildlife, vegetation, species at risk, and Indigenous community considerations
- Baseline studies conducted within the Project footprint to analyze possible effects
 - Birds, mammals, insects, plants
 - Groundwater and surface water
 - Air quality monitoring
 - Aquatic life
- Mitigation measures and monitoring plans include participation of communities and focus on minimizing impacts



- - Project boundary
- - Project study area
- - Provincial Park
- - International Joint Commission Area of Concern (Peninsula Harbour)

Reports are available for review and comment:

- Volume 1 submitted Jan 2021
 - Ch 1 Introduction
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- Joint Panel Review Hearings Fall 2021

Plain language information also available online and in local newspapers

GENERATION PGM News Brief
Plants and Animals in the Marathon Project Area

The Marathon Project Area has been studied by environmental scientists since 2007, as part of the long-term planning for the Marathon Mine, an open pit palladium and copper mine located 10 km north of the Marathon. Marathon's 2020 Terrestrial Baseline Report provides results of recent plant and animal studies in the area.

Our field biologists were out on the ground this spring and taking samples and photos; doing night time bird and bat surveys walking the area studying the local plants and animals. We also worked with Indigenous communities to identify important species that should be considered in our studies.

The area is dense, mature mixed wood and conifer forest, including bedrock outcrops, cliffs and some wetlands. Wildlife studies included putting motion-activated trail cameras in 8 locations around the site in 2020. The cameras took photos of black bear, grey wolf, beaver, snow hare, moose, sandhill crane and marten. White tailed deer are a new species at the site in 2020.

Our 2020 studies also included installing 12 microphones around the site to listen for night time bird and bat calls. No special birds were recorded, but we did find the presence of important bats foraging in the area. Our commitment to Species at Risk includes the creation of a Bat Management Strategy and ongoing work with our local community regulators to plan for an overall benefit to these species.

LATEST NEWS



January 27, 2021
 Generation Mining Announces Completion Of Pilot Plant And Feasibility Study Update

January 5, 2021
 Generation Mining Announces Additional High-Grade Results From Marathon Drilling

December 31, 2020
 Generation Mining Closes \$3.3 Million Flow-Through Financing Led By Eric Sprott

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GENERATION PGM News Brief
Aquatic Baseline Studies at Marathon

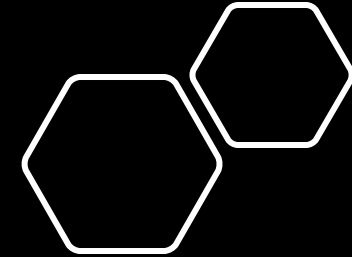
Water and fish in the Marathon Project Area have been studied by environmental scientists since 2006, as part of the long-term planning for the Marathon Palladium Mine. In December 2020, Generation PGM released Baseline Reports describing our studies.

Our work with local communities has also highlighted the importance of water and fish spawning habitat in the Pic River and in Lake Erie. Our field work provides the foundation for Generation PGM's commitment to the protection of water quality and aquatic life.

and water work on-site includes:

- 10 years of water quality data
- 80,000 water quality sample records
- 58 Water quality stations
- 36 Groundwater wells (hydrogeology)
- 11 On-site flow stations

GENERATIONPGM



More Information on the Project can be found at

www.genmining.com

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**If you have additional questions,
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Meeting Agenda

MICHIPICOTEN FIRST NATION meeting with the IMPACT ASSESSMENT AGENCY OF CANADA & THE PROVINCE OF ONTARIO with guest appearance by Generation Mining PROPOSED MARATHON PALLADIUM MINE

Time and Location:

Feb 12, 2021

10am - 11am (Eastern Time)

Zoom meeting:

<https://us02web.zoom.us/j/85415934925?pwd=WUJFKbi8vNVdhcFVUV0hPT2xwamZ0UT09>

Meeting ID: 854 1593 4925

Passcode: 666547

Purpose and Objectives:

- Introductions
- Generation (proponent) – project updates and Michipicoten First Nation questions
- Discuss participant funding
- Next steps

DRAFT Itinerary:

10:00 – 10:15	Introductions (All) IAAC (Luc Desroches) overview of agenda and objective for the meetings as well as open the floor for any additions Michipicoten First Nation would like on the agenda
10:15-10:50	Generation - Project updates and Michipicoten First Nation questions and access to data IAAC and ON – Relevant environmental assessment process updates and IAAC participant funding process
10:50 – 11:00	Next steps, potential follow-up meeting

February 2021

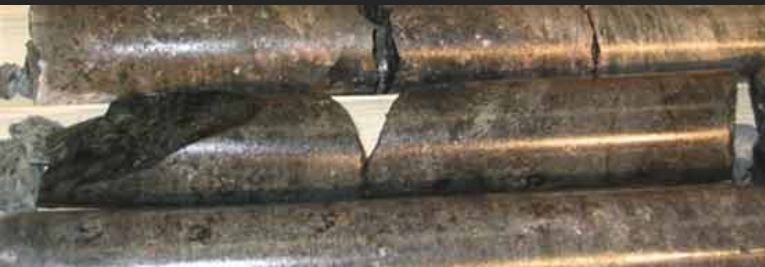
Project Update and EIS Overview

MARATHON PALLADIUM PROJECT

Michipicoten FN and Regulators

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GENERATION PGM



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NEED FOR THE PROJECT

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Industrial Tech



LED lightbulbs



Smart Grids

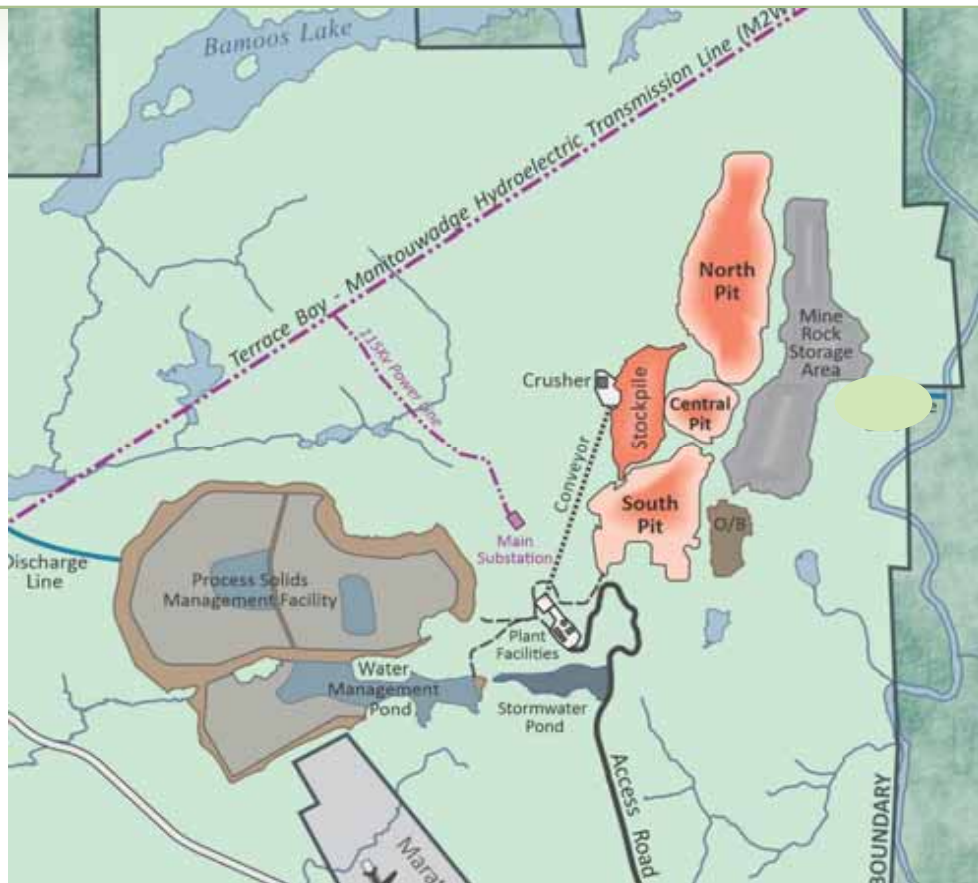
PROJECT OVERVIEW



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GENERATION PGM



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GENERATION PGM

TIMELINE (ESTIMATED)

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GENERATION PGM

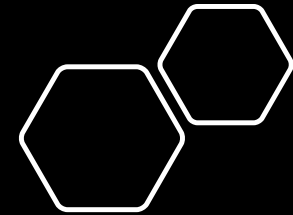
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**If you have additional questions,
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**Jackfish Metis - OCIP
February 17, 2021**

Jackfish Metis	Jon McDonald
Generation PGM	Tabatha LeBlanc
Generation PGM Consultants	Cathryn Moffett
IAAC	Jason Boisvert, Luc Desroches, Genevieve Poitras
MECP	Joseph Tyance, Carolyn Lee
ENDM	Colin Hovi

Meeting Summary

A discussion Jackfish Metis about EIS Report and Consultation Process.

1. Consultation Process

- Jon likes to share information with regional OCIP and local citizens
- Neil Nesbit is a local elder interested in being included
- Volume 1 is available and Volume 2 will be published shortly
- GenPGM has scheduled water meeting for March 10, 2021

2. Closure Planning

- Jon wants to participate in closure planning to ensure left better than before
- Interested in improving access

3. Water and Fish

- Jon is please with Project design but concerned about water
- Bamooos Lake is key concern
- Lake trout are sensitive
- Moberly Bay is an area of concern

4. Road Safety

- Improved safety of highway 17 is required

GENERATION PGM

February 2021

Project Update and EIS Overview

MARATHON PALLADIUM PROJECT

Jackfish Metis and Regulators

Virtual Meeting



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AGENDA

- Introduction
- Indigenous Relations
- Need for the Project
- Project Overview
- Project Timeline
- Environmental Assessment and Joint Review Panel



INTRODUCTION

GENERATIONPGM

- Generation PGM purchased the Marathon Project from Stillwater Canada in 2014
- Exploration was undertaken, prior work evaluated, and the environmental assessment re-started in 2019 (original EIS 2012)
- The Project is an 80:20 Joint Venture between Generation Mining and Sibanye Stillwater
- GenPGM is made up of a small and experienced management team with backgrounds in building, development and operations
- Positive Preliminary Economic Assessment
January 2020
- EIS Addendum planned for submission
February 2021



INDIGENOUS RELATIONS POLICY

GENERATION PGM

Generation PGM acknowledges the unique legal and constitutional rights of Indigenous Peoples and strives to understand and respect their culture, history, beliefs, and traditions.

- Respect the rights of Indigenous Peoples to maintain their culture and identity
- Build positive relationships through meaningful engagement and collaborative processes
- Seek inclusive, transparent, respectful, and meaningful dialogue
- Maximize social and economic benefits and opportunities
- Seek direct community participation in environmental projects
- Ensure oversight from the Board and Executive leadership



Palladium: Ontario's Supply Advantage

Palladium's market value has greatly appreciated due to its critical role in auto manufacturing and vehicle exhaust systems, where it helps transform poisonous gases into less toxic and harmful outputs

- I. Insufficient global palladium supply exists
- II. Canada's platinum-group metals (including palladium) are concentrated Northern Ontario
- III. Expanding palladium production could revitalize Northern Ontario's economy

Marathon Project represents a vital strategic asset for a competitive Ontario economy and instrumental in the transition towards renewable energy and green technologies

Copper: Essential to Vital Technology

Copper is a key metal for many innovative technologies and a necessary component in the production of electric vehicles



Electric Vehicles

A reliable supply of copper will be vital to the success of the recently announced upgrade to Ford's Oakville EV plant



Telecomm



Industrial Tech



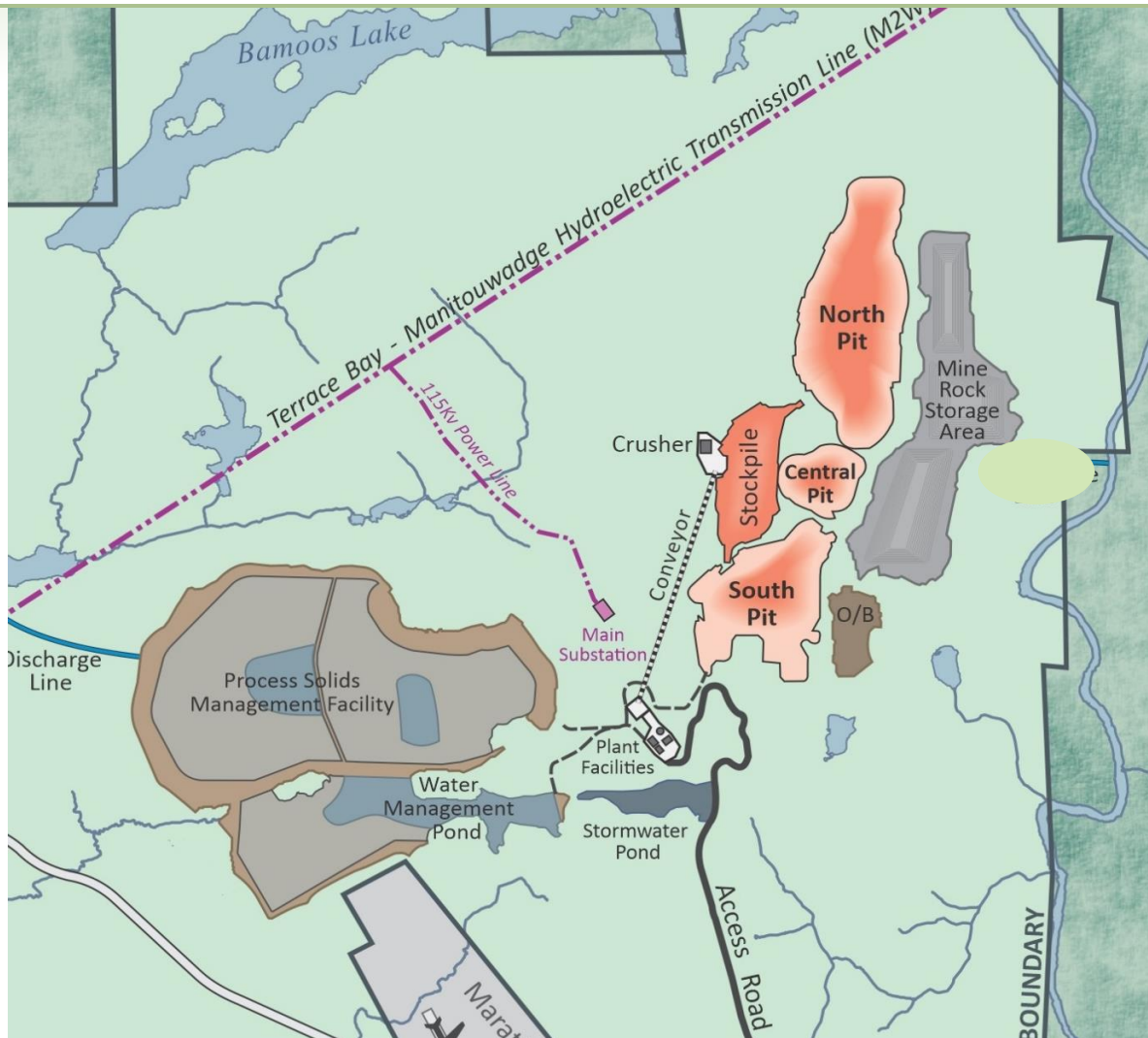
LED lightbulbs



Smart Grids



- The open pit ore will be processed (crushed, ground and concentrated) at an on-site processing facility.
- Final concentrates containing Palladium and Copper will be transported off-site via road and/or rail to a smelter and refinery for extraction and purification
- Site construction will take 18 to 24 months
- Construction workforce will require +900 workers with an average of approximately 450 to 500 people
- Production is estimated to begin late 2023
- Operating workforce estimated at +375 people
- The mine has been designed to ensure that the environment will be protected with specific attention to water, air and species at risk



Proposed Project Footprint

- Three planned open pits (central, north and south)
 - Measured and indicated resources 179.2 M tonnes
 - PSMF, water management ponds and stockpiles
- Mine rock storage area
 - 85-90% non-acid generating mine rock
 - Long term PAG storage in PSMF and open pits
- Process plant facility
 - 25,200 tonnes per day
- 2.2 km of new transmission line
- 2.5 km of new access road
- Excess water will be treated and discharged to Hare Lake

Water Management and Recycling

- Site access road realigned to cross fewer streams
- Process Plant moved out of Pic River watershed, no planned discharge due to re-use
- Water quality monitoring network includes 70 surface water and 50 groundwater locations
- Mine rock stockpile discharge into Hare Lake includes diffuser and ability to treat

Greenhouse Gases and Climate Change

- Mine layout designed to minimize fuel usage
- Trolley Assist being considered for key haulage segments
- Power efficient equipment included in the Processing Plant design
- Evaluating carbon capture alternatives to lower emissions intensity

Species at Risk and Compensation Planning

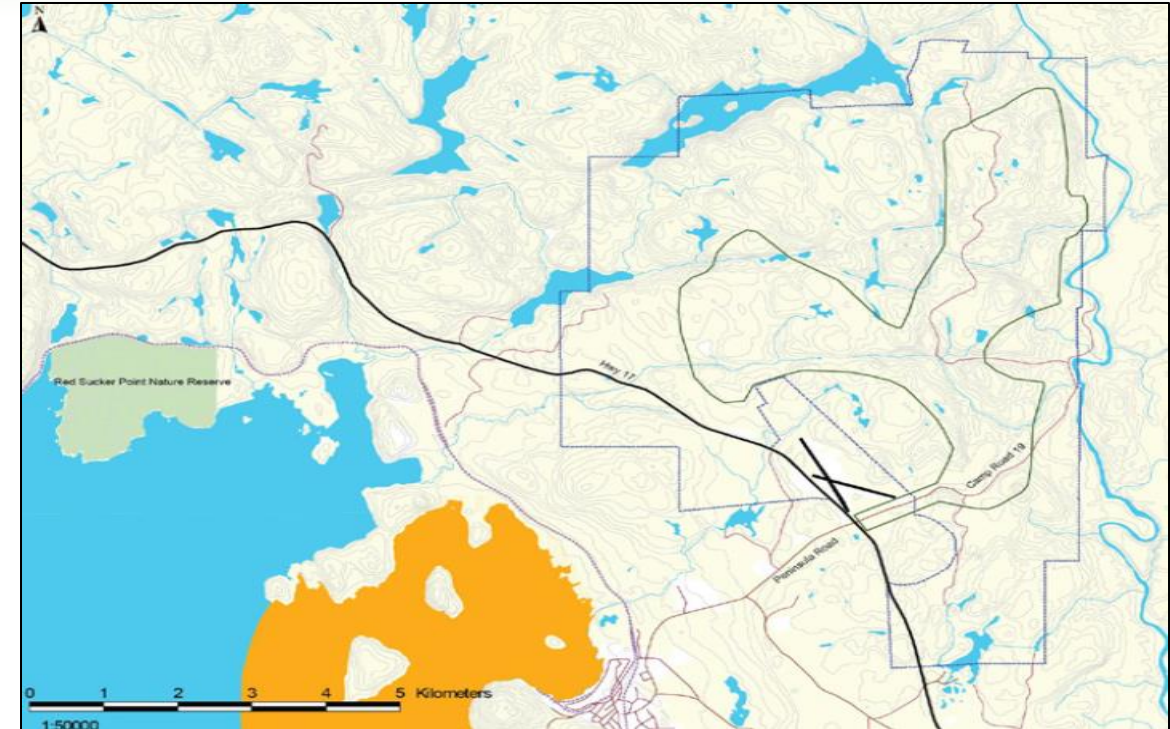
- Site includes caribou habitat as well as important fish, bats, birds and insects
- Existing caribou mitigation strategy in place for exploration activities
- Overall Benefit Plan for caribou currently in draft, including proposed road restoration
- Actively collaborating with communities on environmental values and projects

TIMELINE (ESTIMATED)

	2019	2020	2021	2022	2023
Asset Acquisition	✓				
Update Resource	✓				
PEA Study	✓	✓			
New Listing		✓			
Feasibility Study		✓			
EA/Permits/Social		✓	★ Complete EIS and Start JRP		
Detailed Engineering					
Mine Financing					
Construction				★ Start Construction: 2022 (18mo)	
Production				Commissioning / Commence Production: 2023 ★ >	

* Important note: Construction and production are subject to favorable results in the feasibility study, permitting and financing of the project.

- Gen PGM is dedicated to protecting the Valued Ecosystem Components (VECs)
- Key elements include: management of water, protecting wildlife, vegetation, species at risk, and Indigenous community considerations
- Baseline studies conducted within the Project footprint to analyze possible effects
 - Birds, mammals, insects, plants
 - Groundwater and surface water
 - Air quality monitoring
 - Aquatic life
- Mitigation measures and monitoring plans include participation of communities and focus on minimizing impacts



- - Project boundary
- - Project study area
- - Provincial Park
- - International Joint Commission Area of Concern (Peninsula Harbour)

Reports are available for review and comment:

- Volume 1 submitted Jan 2021
 - Ch 1 Introduction
 - Ch 2 Project Scoping
 - Ch 3 Project Alternatives
 - Ch 4 Environmental Setting

- Volume 2 planned submission Feb 2021
 - Ch 5 Consultation
 - Ch 6 Assessment of Impacts
 - Ch 7 Environmental Management
 - Ch 8 Commitments

- Joint Panel Review Hearings Fall 2021

Plain language information also available online and in local newspapers

GENERATION PGM News Brief
Plants and Animals in the Marathon Project Area

The Marathon Project Area has been studied by environmental scientists since 2007, as part of the long-term planning for the Marathon Mine, an open pit palladium and copper mine located 10 km north of the Marathon. Marathon's 2020 Terrestrial Baseline Report provides results of recent plant and animal studies in the area.

Our field biologists were out on the ground this spring and taking samples and photos; doing night time bird and bat surveys walking the area studying the local plants and animals. We also worked with Indigenous communities to identify important species that should be considered in our studies.

The area is dense, mature mixed wood and conifer forest, including bedrock outcrops, cliffs and some wetlands. Wildlife studies included putting motion-activated trail cameras in 8 locations around the site in 2020. The cameras took photos of black bear, grey wolf, beaver, snow hare, moose, sandhill crane and marten. White tailed deer are a new species at the site in 2020.

Our 2020 studies also included installing 12 microphones around the site to listen for night time bird and bat calls. No special birds were recorded, but we did find the presence of important bats foraging in the area. Our commitment to Species at Risk includes the creation of a Bat Management Strategy and ongoing work with our local community regulators to plan for an overall benefit to these species.

LATEST NEWS



January 27, 2021
 Generation Mining Announces Completion Of Pilot Plant And Feasibility Study Update

January 5, 2021
 Generation Mining Announces Additional High-Grade Results From Marathon Drilling

December 31, 2020
 Generation Mining Closes \$3.3 Million Flow-Through Financing Led By Eric Sprott

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GENERATION PGM News Brief
Aquatic Baseline Studies at Marathon

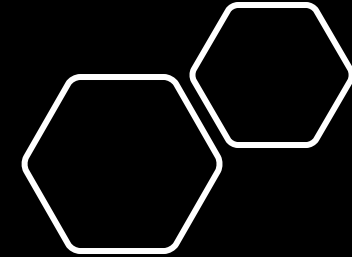
Water and fish in the Marathon Project Area have been studied by environmental scientists since 2006, as part of the long-term planning for the Marathon Palladium Mine. In December 2020, Generation PGM released Baseline Reports describing our studies.

Our work with local communities has also highlighted the importance of water and fish spawning habitat in the Pic River and in Lake Erie. Our field work provides the foundation for Generation PGM's commitment to the protection of water quality and aquatic life.

and water work on-site includes:
 10 years of water quality data
 80,000 water quality sample records
 58 Water quality stations
 36 Groundwater wells (hydrogeology)
 11 On-site flow stations



GENERATIONPGM



More Information on the Project can be found at

www.genmining.com

and the Impact Assessment Registry at

<https://iaac-aeic.gc.ca/050/evaluations/proj/54755?culture=en-CA>

**If you have additional questions,
please email us at comments@genpgm.com**

Pays Plat First Nation
February 18 2021
Committee Meeting

Pays Plat First Nation	Mary Hardy, Ginny Michano, Debbie King, John Scurza, Peter Hollinger, Joyce
Generation PGM	Tabatha LeBlanc
Generation PGM Consultants	Ruben Wallin, Kevin Sherlock and Cathryn Moffett

Meeting Summary

A discussion with PPFN around EIS Addendum process and review

1. EIS Process

- Discussion of regulatory process and timing
- Third party review of EIS Addendum to be funded by GenPGM
- Review will include mine plan and addendum reports, including hearing participation
- Process agreement is being drafted for GenPGM to review

2. Communication Process

- File sharing site could be useful for documents and reports
- Community Facebook can be used for information sharing
- Fliers and direct mail is available
- Not all members like to use technology

3. TLU Studies

- TK studies need update, regularly updated every 2-3 years
- Supports comprehensive claim
- Plan to hire a consultant to help undertake interviews
- Discussion around seeking information on end land use or dietary surveys

4. Community Benefits

- Both prefer a revenue sharing model
- Deb requires support, individual not yet identified

Follow Up: Deb to provide a write up of existing environmental projects around water quality and climate change

GENERATION PGM

March 2021

Water Management

MARATHON PALLADIUM PROJECT

Monthly Environmental Update



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AGENDA

- Project Overview and Update
- Water Management Strategy
- Water use and discharge
- Impacts to Fish and Fish Habitat
- Navigable waters
- Ongoing monitoring





- The open pit ore will be processed (crushed, ground and concentrated) at an on-site processing facility.
- Final concentrates containing Palladium and Copper will be transported off-site via road and/or rail to a smelter and refinery for extraction and purification
- Site construction will take 18 to 24 months
- Construction workforce will require +900 workers with an average of approximately 450 to 500 people
- Production is estimated to begin late 2023
- Operating workforce estimated at +375 people
- The mine has been designed to ensure that the environment will be protected with specific attention to water, air and species at risk



Recent Milestones

- Positive Feasibility Study announced March 3, 2021
- Technical Report to be released March 29, 2021

- Four EIS technical reports to be posted online March 12, 2021
- EIS Volume 2 finalization underway

- Received statements of support from 5 Indigenous communities



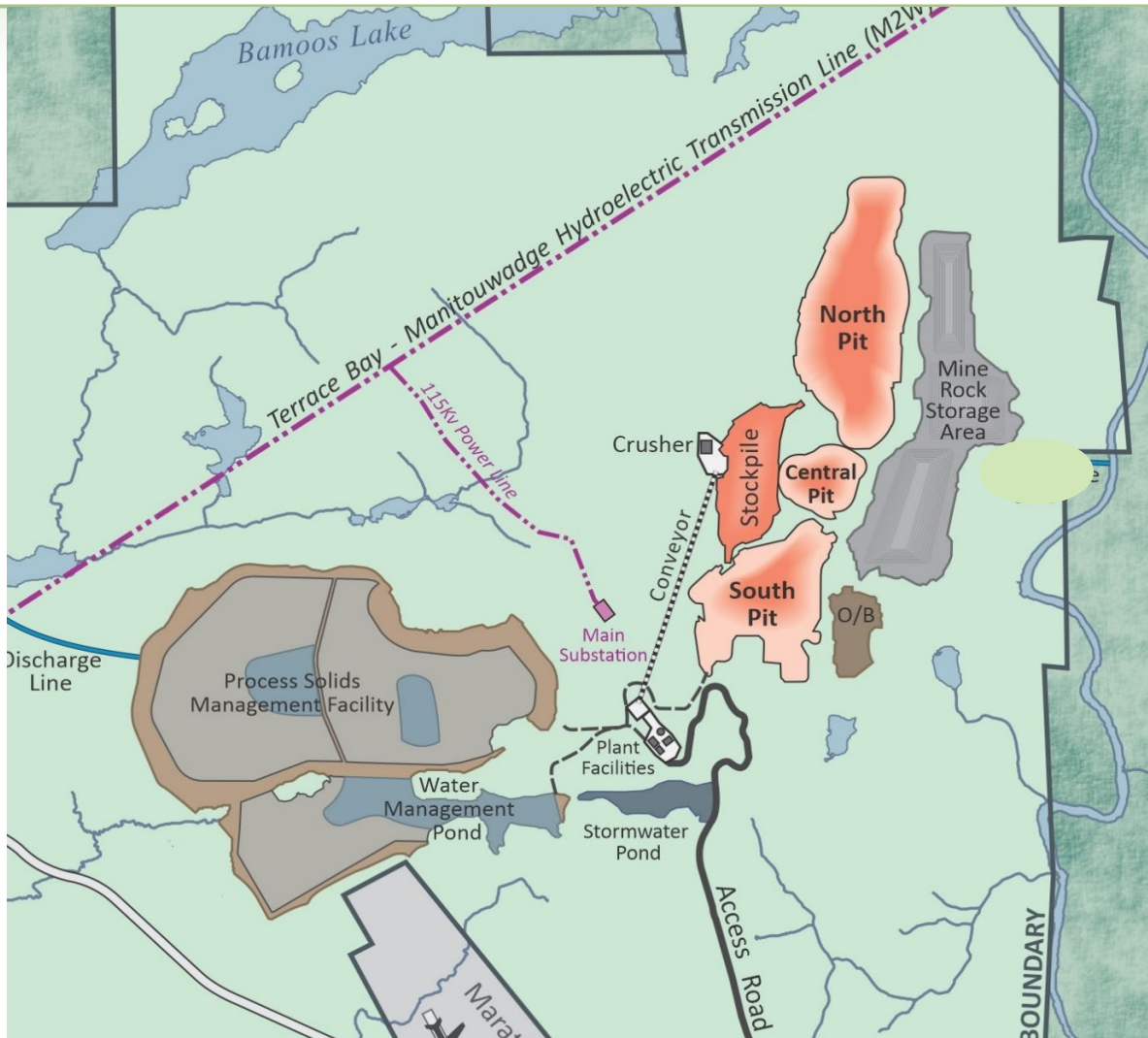
Feasibility Study Highlights:

- **Robust economics:** Internal Rate of Return of 29.7% and Net Present Value of \$1.07 billion
- **Long term price assumption:** US\$1,725/oz for palladium and US\$3.20/lb for copper
- **Quick payback::** 2.3-year payback period
- **Low operating costs:** LOM average cash costs of US\$687/Pd Eq. oz
- **Payable metals:** 1.9 M oz palladium, 467 M lbs copper, 537,000 oz platinum, 151,000 oz gold and 2.8 M oz silver
- **Taxes:** The Project is expected to generate \$944 million in provincial and federal taxes

TIMELINE (ESTIMATED)

	2019	2020	2021	2022	2023
Asset Acquisition	✓				
Update Resource	✓				
PEA Study	✓	✓			
New Listing		✓			
Feasibility Study		✓			
EA/Permits/Social		✓	★ Complete EIS and Start JRP		
Detailed Engineering					
Mine Financing					
Construction				★ Start Construction: 2022 (18mo)	
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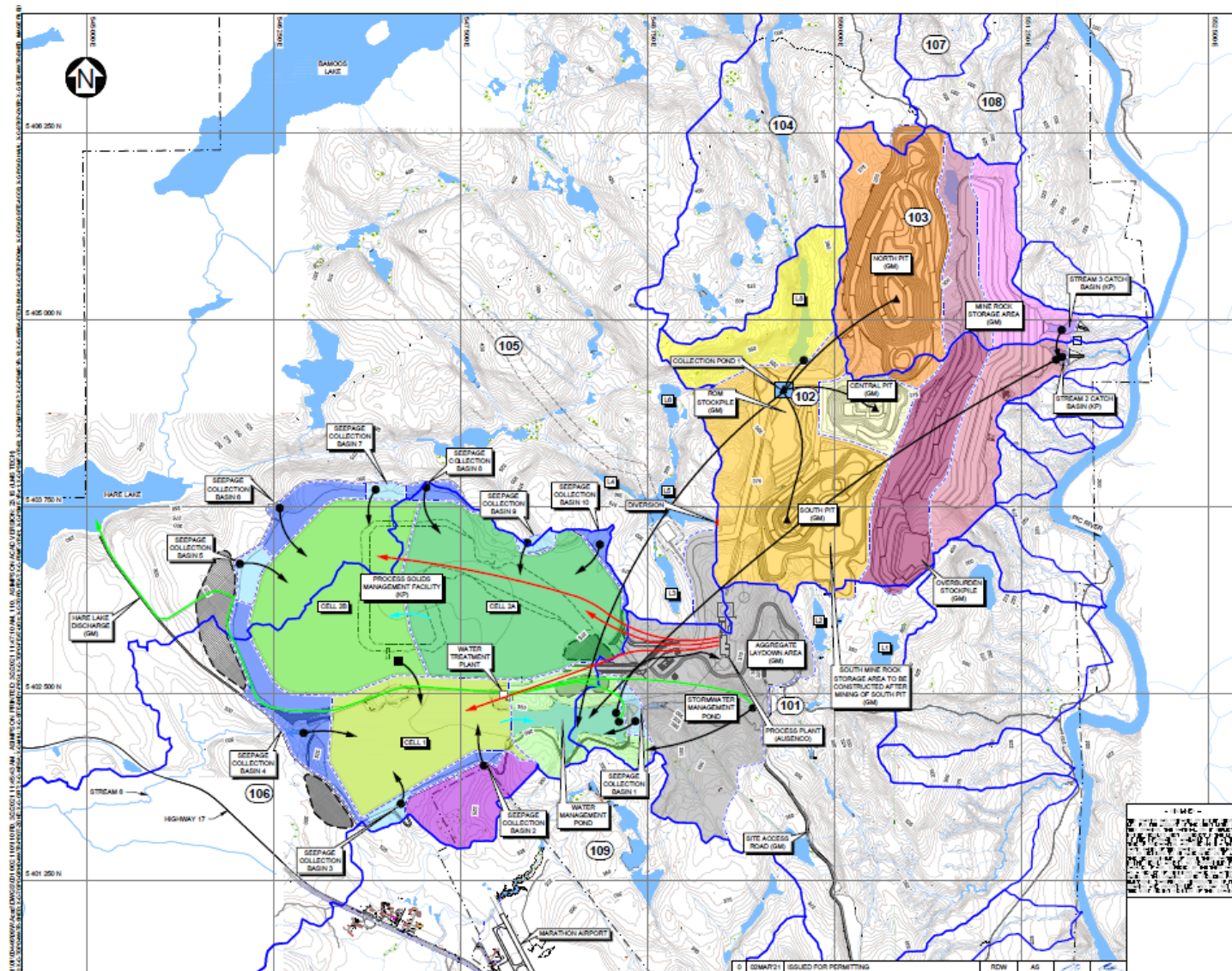
Proposed Project Footprint

- Three planned open pits (central, north and south)
- Process Solids Management Facility (PSMF)
- Mine rock storage area (MRSA)
- Process plant facility (25,200 tpd)

Optimization

- Access road realigned to cross fewer streams
- Process Plant moved out of Pic River watershed
- Single point of discharge into Hare Lake
- Water treatment plant and diffuser

- Contact water from the site will be managed within the Water Management Pond of the PSMF.
- **The Water Management Pond (WMP) has a design capacity of 1.4M m³**
- The WMP will be constructed on the east side of the PSFM and will initially be used as a storage pond for construction dewatering.
- Contact water from the Project site, including water from the open pits, MRSA, Process Plant, and PSMF will all be transferred to the WMP.
- Water from the WMP will be reclaimed to the Process Plant on an ongoing basis.
- Excess water will be transferred from the WMP to a water treatment plant (located at the PSMF), treated as required, and discharged to Hare Lake




- PSMF SEEPAGE COLLECTION BASIN CATCHMENT AREAS:**
- -
 -
 -
- PSMF CATCHMENT AREAS:**
- -
 -
 -
- OPEN PIT CATCHMENT AREAS:**
- -
 -
 -
- STORMWATER MANAGEMENT POND CATCHMENT AREA:**
-
- MINE ROCK STORAGE AREA CATCH BASIN CATCHMENT AREAS:**
- -
 -
 -
- DIVERTED TO SUB-WATERSHED 108**
-

- LEGEND:**
- WATER
 - WETLANDS
 - ROAD
 - STREAM / RIVER / DRAINAGE
 - PROPERTY BOUNDARY
 - SUB-WATERSHED BOUNDARY
 - SUB-WATERSHED NUMBER
 - WATER MANAGEMENT CATCHMENT AREA
 - SUBMERSIBLE PUMP / DECANT
 - FLOATING PUMP BARGE
 - WATER TREATMENT PLANT
 - PORTABLE PUMP
 - DIVERSION
 - WATER TRANSFER PIPELINE
 - PROCESS SOLIDS PIPELINE
 - EXCESS WATER DISCHARGE PIPELINE
 - GRAVITY OVERFLOW
 - OVERFLOW DITCH

- NOTES:**
1. COORDINATE GRID IS UTM (NAD83) ZONE 18 N AND IS IN METRES.
 2. CONTOUR INTERVAL IS 5 METRES.
 3. ALL DIMENSIONS ARE IN MILLIMETRES AND ELEVATIONS ARE IN METRES, UNLESS NOTED OTHERWISE.

ISSUED FOR PERMITTING

SCALE 1:1000



GENERATION MINING

MARATHON PALLADIUM PROJECT

SITE WATER MANAGEMENT LAYOUT PLAN

REV. NO.	DESCRIPTION	REV.	DATE	DESCRIPTION	DESIGNED	DRAWN	REVIEWED	APPROVED

DRAWING NO. NB101-446/9	REVISION NO. 110	REVISION 0
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WATER MANAGEMENT – storage and movement

GENERATION PGM

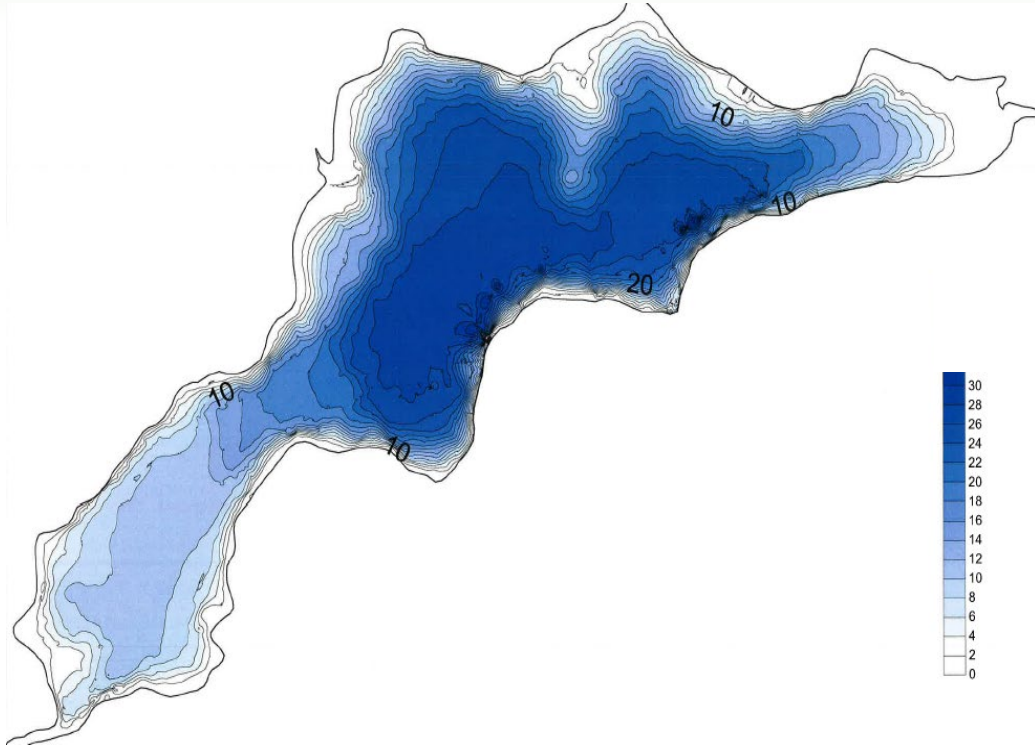
Open Pit → Collection Pond → Water Management Pond

PSMF → Seepage Collection Basins → WMP

Process Plant → Storm Water Management Pond (600,000 m³) → WMP

MRSA → Catch Basins (150,000 m³) → WMP

- Process plant requires 30,000 m³ per day, 85% will be recycled
- All process water and contact water to be collected and sent to Water Management Pond
- Excess water will be treated prior to discharge into Hare Lake
 - Water treatment plant for TSS and Phosphorous
 - Annual volume of discharge varies year to year
 - Discharge between April – November
 - Offshore multi-port diffuser
 - Small mixing zone protective of aquatic life



- Surface area ~ 57 ha
- Max depth ~ 30 m
- Vol. ~ 8.5 Mm³
- Mean Depth ~ 15 m

- Eleven fish species have been documented
- Yellow perch and spottail shiner most abundant
- Northern pike and cisco also common
- Walleye were stocked in the 1950s but were not found during baseline studies

Water Quality Monitoring

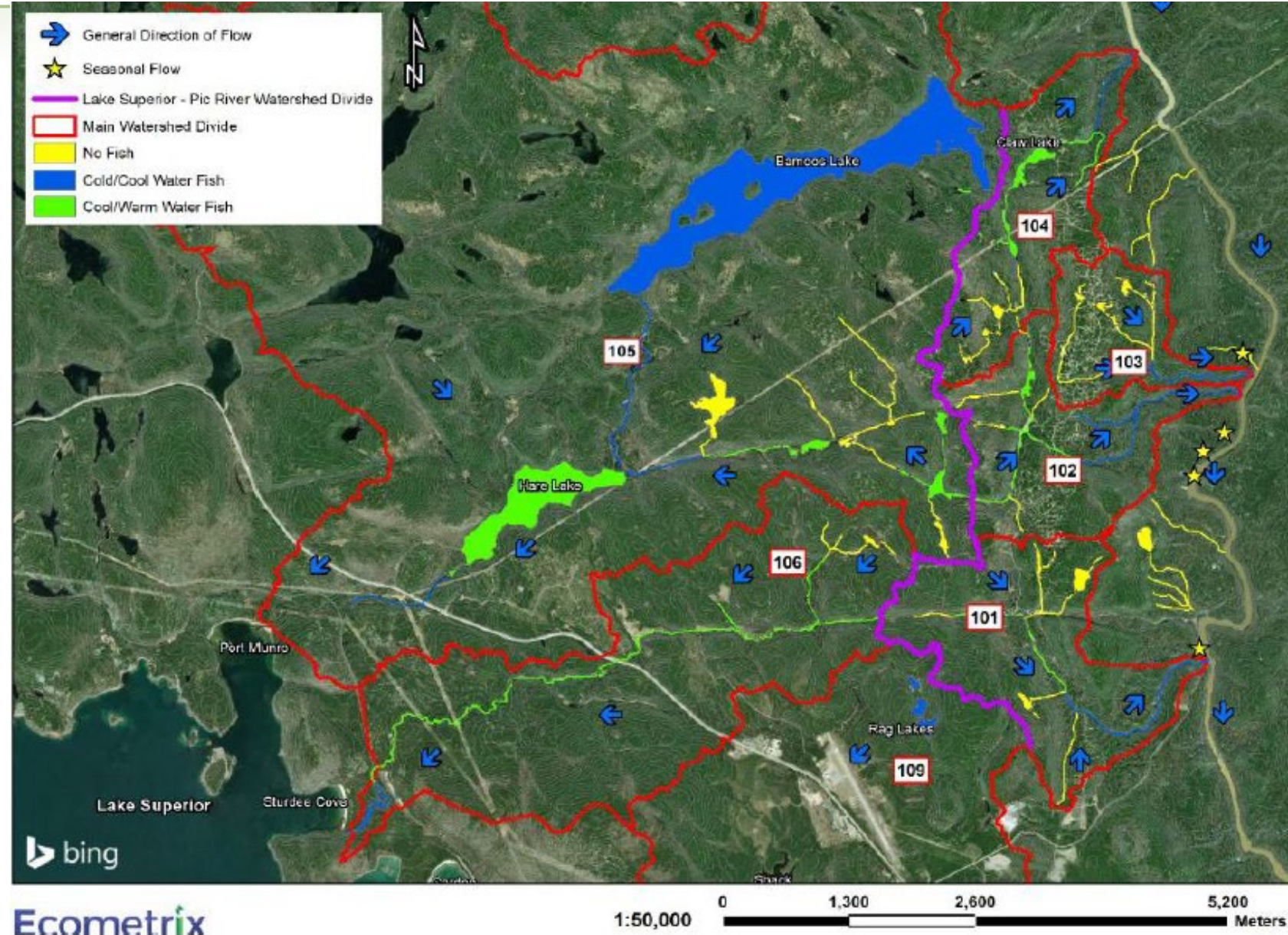
- Large network in and around site
- Monitoring to confirm effluent quantity and quality
- Plume delineation in Hare Lake to confirm the mixing efficiency
- Water quality in Hare Lake to identify potential changes



Rugged landscape results in isolated streams and ponds without fish (show in yellow)

Multi-year, multi-season studies since 2008.

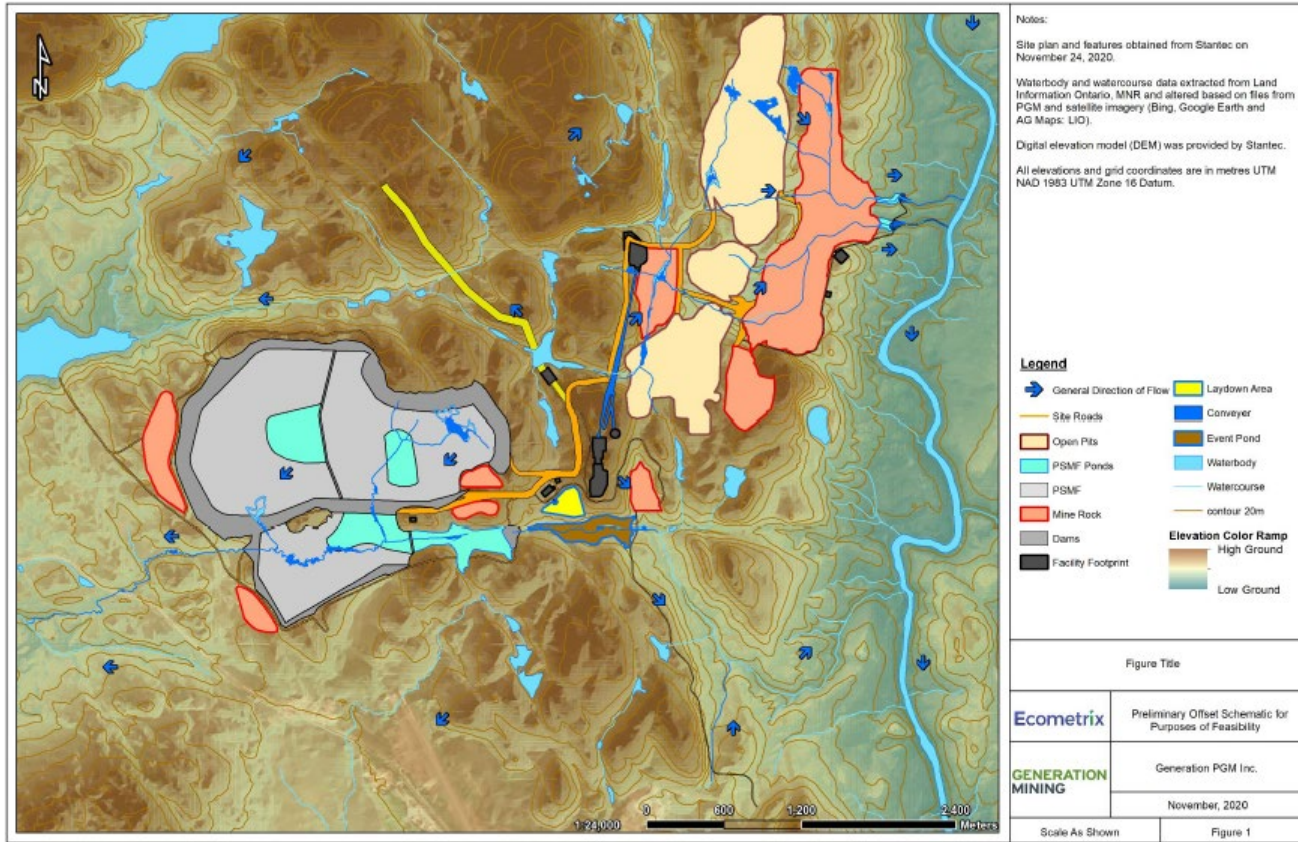
- Where present limited to forage fish on the site
- Limited access of some resident and migratory cold water species (salmon, trout) in lower middle reaches of some tributaries (101, 102, 103, 106)
- Hare Lake has a mix of species (pike, perch, sucker, cisco)



FISH AND FISH HABITAT

Loss of fish habitat from overprinting and flow loss will be ~14 ha

The direct overprinting of fish bearing habitat is estimated to be ~8.5 ha

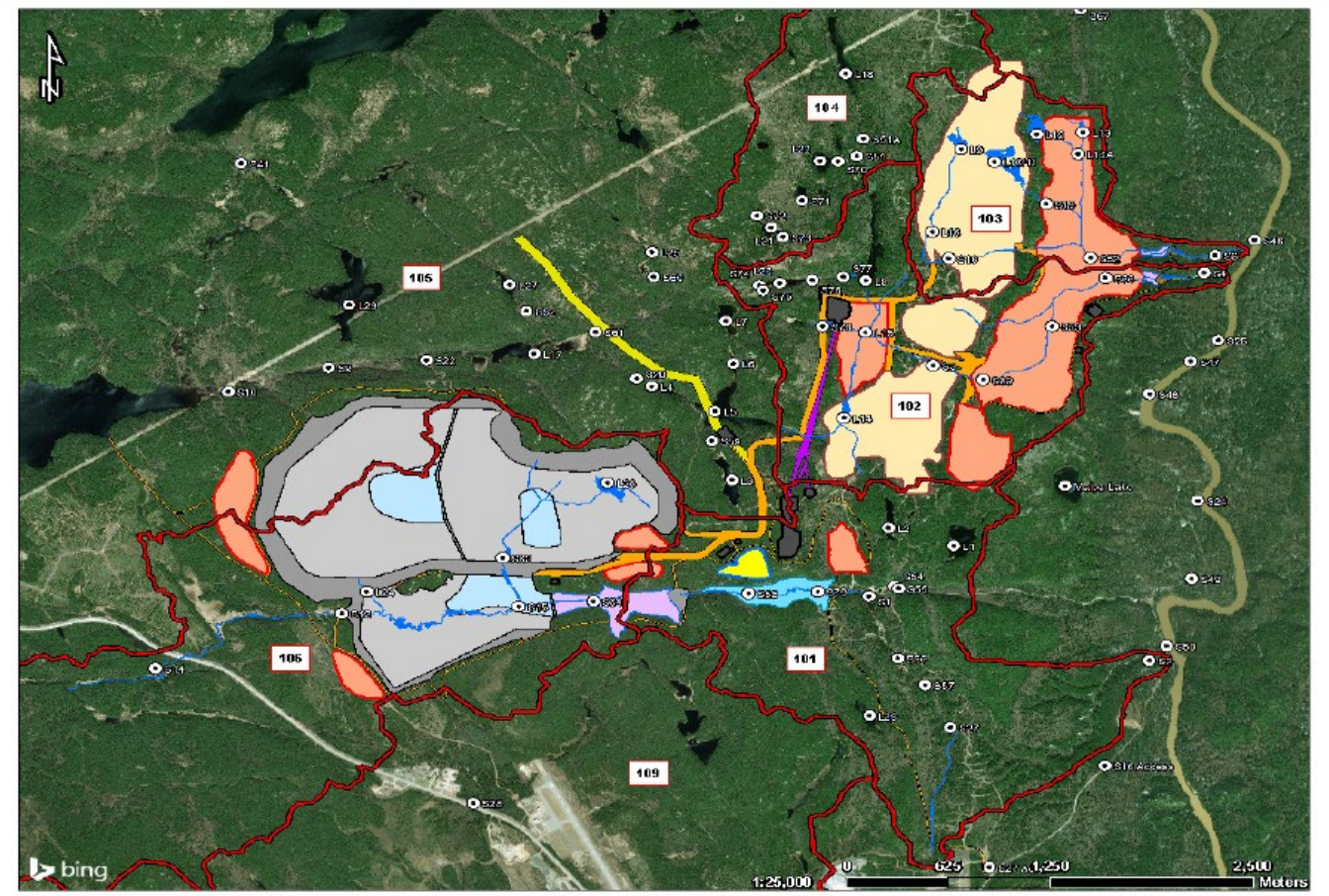


Watershed	Habitat Type		
	Fish bearing	Non-fish bearing	Total
101	0.44	0.18	0.62
102	2.24	0.30	2.54
103	0.48	3.88	4.49
104	0.00	0.00	0.00
105	0.00	0.00	0.00
106	5.38	1.49	6.87
109	0.00	0.00	0.00
Total	8.54	5.85	14.39

Fish Habitat Offset will likely cost between \$2M and \$5M (preliminary)

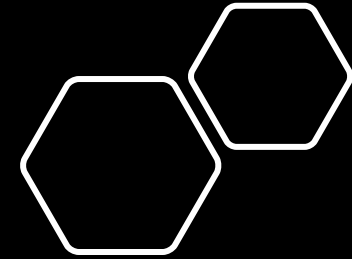
- Fish salvage and relocation will be required
- Goal is to meet “equivalency” and match ecological productivity of losses
- Construction of new habitat on and off site
- Local research and community participation
- Seeking input on specific fish values and opportunities

- Assessment concludes that loss of creeks and ponds overprinted by the Project will not impact navigable waters
- Small and shallow connecting channels full of obstructions and/or at high gradients.
- Potential impact to Hare Lake based on planned discharge to be mitigated through water treatment and environmental monitoring



- Water quality monitoring at end of pipe and in Hare Lake, as well as locations in other local streams that are associated with the site
- Sampling of fish communities, benthic invertebrates and sediments at Hare Lake and Pic River
- Fish tissue sampling program to monitor metal levels
- Establish reference stations
- Support community monitoring programs
- Performance monitoring programs to assess success of habitat offset projects

GENERATIONPGM



More Information on the Project can be found at

www.genmining.com

and the Impact Assessment Registry at

<https://iaac-aeic.gc.ca/050/evaluations/proj/54755?culture=en-CA>

**If you have additional questions,
please email us at comments@genpgm.com**

Marathon Palladium Project Joint Project Update

Water Management

Participants : GenPGM (3), Brian Fraser Ecometrix, Don Elliot (TOM), Red sky (2), Phil McGuire

Presenters : C. Moffet and B. Fraser

Topics Covered :

- Project Overview with proposed timelines, expected workforce and recent milestones.
- Feasibility Study highlights including the rate of return, metal prices, etc.
- Project Design and the optimization from the previous mine design plan from 2014.
- Water Management Strategy
 - Water management pond of 1.4m³
 - One of first things to be constructed on site, the WMP will be used as a storage pond for the construction dewatering
 - Excess water treated in the Treatment Plant and then discharged to Hare Lake
 - Water storage movement on site demonstrated via layout plan
- Water Use and Discharge (85% of water will be recycled) – 15% new water required and taken from water management pond
 - Discharge rates depend on the needs of the mill and will happen between April – November but won't necessarily happen each month
 - Based on water in Hare Lake (quantity) and the limited water being discharged there will not be a big change in geochemistry after the lake undergoes mass mixing (The water will still be under water quality standards)
- Information on Hare Lake (bathymetry, fish species), water quality monitors in and around site and will increase monitoring the effluent quantity and quality prior to discharge to the lake
- Fish and Fish Habitat: the project footprint itself is generally fish barren (likely due to rugged topography)
 - Loss of fish habitat from overprinting and flow loss ~14ha, the direct overprinting of fish bearing habitat ~8.5ha
 - Fish Habitat Offset will likely cost between 2-5 million dollars (a very preliminary budget) but the Project will require a fish salvage and relocation project prior to construction
- Navigable water assessment reports indicate that a loss of creeks and ponds will not likely impact transportation via waters. We are committed to mitigating water output at Hare Lake because we recognize it as a navigable water source.

-Environmental monitoring is an important part of the project, historically and future monitoring. Sampling of fish communities, benthics and sediments, fish tissue key items.

-Reference stations will be used from an unaffected water source to compare water quality to the Project site.

Questions:

Q: Will discharge effect fish (from lake chemistry changing)?

A: The modelling that we have done to date (and results in the Volume 2 EIS) it clearly shows that water quality in Hare Lake will continue to be below appropriate water quality benchmarks provided by Provincial government and when parameters weren't in the provincial guidelines we used Federal guidelines. Those benchmarks are derived from protecting the most sensitive species in the Lake and thus would include fish.

Q: What kind of retention does the water treatment plant have?

A: Water won't go to the water treatment plant until it is ready to be discharged. There is a massive volume storage capacity in the system (water management pond) and this is where the majority of holding water will be.

Q: Why April to November?

A: The snow will start to melt in April and the excess water around site will be the time of year where the discharge to Hare Lake needs to start. In most years there will not be discharge in every month, in dryer months there might not be any discharge at all for multiple months.

Q: Will the Project require the fisheries to create an offset plan?

A: Yes they will, it will include Fisheries and Oceans Canada (when impacting fish but not necessarily placing material directly on creeks/streams etc) and Environment Canada (placing rock directly on a creek)

Comment : Run off from Hare Lake to Lake Superior and the tributaries associated with the water movement has to be very closely monitored

A: There have been no impacts noted in our studies that runoff will affect Lake Superior.

Comment : Opening up a creek will also give the opportunity for species to move up into bigger spawning areas.

A: Those are the types of opportunities we would like to bring to the Project like creating larger pond habitat and taking away some of the obstructions that topography is creating.

Comment: According to our database Bamooos, Pic River, Hare Lake are lakes that Red Sky members fish at. Maybe could be used to highlight a fish tissue sampling program to know if the fish are safe to eat.

Comment : The dominant fish that people go after in the region are walleye, optimizing their spawning conditions would be ideal.

Government Review Team Project Design March 18, 2021

87 participants from government, proponent and consultants

Provincial Government	MNRF, MTO, MECP, ENDM, Heritagae
Federal Government	IAAC, DFO, ECCC,
Generation PGM	Tabatha LeBlanc, Drew Anwyl
Generation PGM Consultants	Craig, Brian, Ron, Paul, Jason, Chris, Paula, Steve Haggerty Cathryn Moffett,

Meeting Summary

A presentation to the expanded Government Review Team covering general mine design and sequencing

Project Design Year -2 to Year 13

- Craig shows Google Earth general arrangement and describes sequencing of clearing and construction

Q – Will footprint change from 2012 to 2020 be illustrated?

A – No shown on this arrangement, however should be noted that MRSA was pulled out of sub-watershed 108 and the processing facility has been moved to a central location away from the Pic River.

Q – What is the return period for the MRSA catch basins?

A – 1:25 year flood, with additional pumping capabilities

Note: ECCC and DFO stated that catch basins should be designed to 1:100 year flood

Q – What stream crossings or overprinting will occur?

A – This level of detail isn't included in the arrangement presented today but we welcome further meetings and discussions

Q – Will runoff be collected from overburden stockpiles ?

A – Yes, it will be collected and sent to the south pit

Q – Will Type 2 tailings and waste rock be double handled?

A – No, this is no longer planned. For year 1- 6 it will be deposited in the PSMF and during year 6-12 it will be deposited in the south pit

Q – Will conventional slurry be used for tailings storage?

A – Type 1 tailings will be thickened and Type 2 will be conventional

Q – what are the ultimate dam heights at the PSMF?

A – 80 m high on the west side

Q – Can you show monitoring locations for noise, dust, water?

A – This information is not included in today's presentation, but water monitoring will be focused on the discharge location to Hare Lake, MRSA catch basins and downgradient of the infrastructure

Q – Will seepage collection occur at the PSMF?

A – Yes, ten collection basins are planned at the topographic lows around the facility. The water will be collected and send to the water treatment pond, then back to the process plant for re-use

Q – Does the Project design or closure plan include any consideration of the deep resource and potential underground mining?

A – Not at this time

- Craig describes general closure concept

Q – How was the discharge location selected?

A – Based on feedback from consultation that indicated preference to avoid Pic River, Lake Superior or Bamooos Lake. Hare Lake was preferred discharge location for communities.

Q – Have you undertaken a mixing model for near and far conditions in Hare Lake?

A – Yes, the discharge water quality is good and the mixing zone will be small

Q – What is the setback from the MRSA to Pic River? The river banks are active and may be subject to erosion.

A – The setback is 450m but the catchbasins are within the extended flood plain

GENERATION PGM

March 2021

Project Overview

MARATHON PALLADIUM PROJECT

PPFN and Pinchin Environmental
Virtual Meeting



AGENDA

- Introductions
- Review of Objectives
- Project Overview
- Reports for Review
- November 2020 Comments
- Plans for Ongoing Collaboration



INTRODUCTION

GENERATION PGM

- Generation PGM purchased the Marathon Project from Stillwater Canada in 2014
- Exploration was undertaken, prior work evaluated, and the environmental assessment re-started in 2019 (original EIS 2012)
- The Project is an 80:20 Joint Venture between Generation Mining and Sibanye Stillwater
- GenPGM is made up of a small and experienced management team with backgrounds in building, development and operations
- Positive Preliminary Economic Assessment
January 2020
- EIS Addendum planned for submission
April 2021



Pinchin Objectives (as per scope)

- Project Description
- Baseline Studies
- Mitigation Measures
- Significance of Effects

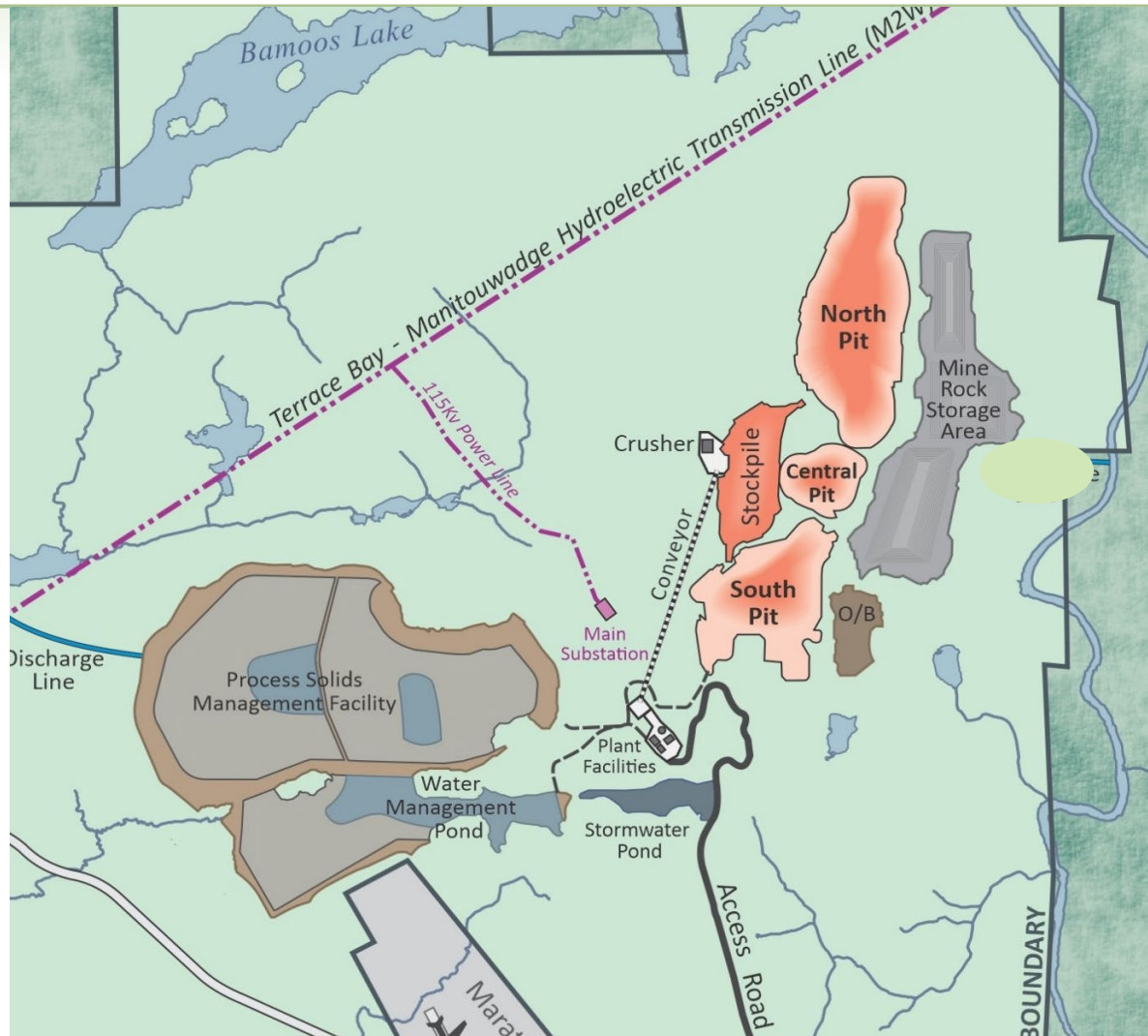
TIMELINE (ESTIMATED)

	2019	2020	2021	2022	2023
Asset Acquisition	✓				
Update Resource	✓				
PEA Study	✓	✓			
New Listing		✓			
Feasibility Study		✓			
EA/Permits/Social		✓			
Detailed Engineering					
Construction					
Production					





- The open pit ore will be processed (crushed, ground and concentrated) at an on-site processing facility.
- Final concentrates containing Palladium and Copper will be transported off-site via road and/or rail to a smelter and refinery for extraction and purification
- Site construction will take 18 to 24 months
- Construction workforce will require +900 workers with an average of approximately 450 to 500 people
- Production is estimated to begin late 2023
- Operating workforce estimated at +375 people
- The mine has been designed to ensure that the environment will be protected with specific attention to water, air and species at risk



Proposed Project Footprint

- Three planned open pits (central, north and south)
 - Measured and indicated resources 179.2 M tonnes
 - PSMF, water management ponds and stockpiles
- Mine rock storage area
 - 85-90% non-acid generating mine rock
 - Long term PAG storage in PSMF and open pits
- Process plant facility
 - 25,200 tonnes per day
- 2.2 km of new transmission line
- 2.5 km of new access road
- Excess water will be treated and discharged to Hare Lake

Reports are available for review and comment:

- Volume 1 (Jan 2021)
 - Ch 1 Introduction
 - Ch 2 Project Scoping
 - Ch 3 Project Alternatives
 - Ch 4 Environmental Setting

- Baseline Report Updates

- Volume 2 planned (April 2021)
 - Ch 5 Consultation
 - Ch 6 Assessment of Impacts
 - Ch 7 Environmental Management
 - Ch 8 Commitments

Plain language information also available online and in local newspapers

GENERATION PGM News Brief
Plants and Animals in the Marathon Project Area

The Marathon Project Area has been studied by environmental scientists since 2007, as part of the long-term planning for the Marathon Mine, an open pit palladium and copper mine located 10 km north of the town of Marathon. Marathon's 2020 Terrestrial Baseline Report provides results of recent plant and animal studies in the area.

Our field biologists were out on the ground this spring and taking samples and photos; doing night time bird and bat surveys walking the area studying the local plants and animals. We also worked with Indigenous communities to identify important species that should be considered in our studies.

The area is dense, mature mixed wood and conifer forest, including bedrock outcrops, cliffs and some wetlands. Wildlife studies included putting motion-activated trail cameras in 8 locations around the site in 2020. The cameras took photos of black bear, grey wolf, beaver, snow hare, moose, sandhill crane and marten. White tailed deer are a new species at the site in 2020.

Our 2020 studies also included installing 12 microphones around the site to listen for night time bird and bat calls. No special birds were recorded, but we did find the presence of important bats foraging in the area. Our commitment to Species at Risk includes the creation of a Bat Management Strategy and ongoing work with our local community regulators to plan for an overall benefit to these species.

LATEST NEWS



January 27, 2021

Generation Mining Announces Completion Of Pilot Plant And Feasibility Study Update

January 5, 2021

Generation Mining Announces Additional High-Grade Results From Marathon Drilling

December 31, 2020

Generation Mining Closes \$3.3 Million Flow-Through Financing Led By Eric Sprott

Join Our Email List

GENERATION PGM News Brief
Aquatic Baseline Studies at Marathon

Water and fish in the Marathon Project Area have been studied by environmental scientists since 2006, as part of the long-term planning for the Marathon Palladium Mine. In December 2020, Generation PGM released Baseline Reports describing our studies.

Our work with local communities has also highlighted the importance of riparian water and fish spawning habitat in the Pic River and in Lake Superior. Our field work provides the foundation for Generation PGM's commitment to the protection of water quality and aquatic life.

and water work on-site includes:
 10 years of water quality data
 80,000 water quality sample records
 58 Water quality stations
 36 Groundwater wells (hydrogeology)
 11 On-site flow stations

Identified deficiencies

- Consultation and engagement
- Project description
- Incorporation of traditional knowledge
- Potential impacts to aquatic environment
- Project-environment interactions
- Residual effects assessment
- Effects to Lake Superior
- Baseline data and species at risk

Meeting 1: Introduction and Project Overview – March 29

Meeting 2: Closure Planning – April 14

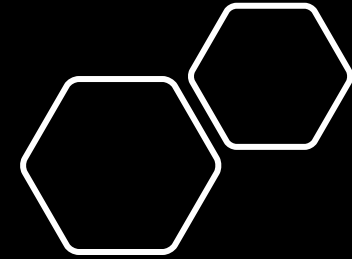
Meeting 3: Baseline Studies and Water Management – April 28

Meeting 4: Fish and Fish Habitat – May 12

Meeting 5: Impact Assessment and Mitigation – May 26

Meeting 6: Species at Risk – June 9

GENERATIONPGM



More Information on the Project can be found at

www.genmining.com

and the Impact Assessment Registry at

<https://iaac-aeic.gc.ca/050/evaluations/proj/54755?culture=en-CA>

**If you have additional questions,
please email us at comments@genpgm.com**

Date: March 29, 2021 at 2:00 pm EST

Call: Socioeconomic Discussion, Biigtigong Nishnaabeg

Attendees:

Mark Shrimpton, Stantec
Chris Powell, Stantec
Paula Sdao, Stantec
Tabatha LeBlanc, Gen PGM
Dan Michano, BN
Debi Bouchie, BN

Discussion:

Q: What is the current housing count?

A: 168 houses currently present.

Q: How many of those currently are vacant?

A: Currently none are vacant. Anything that is livable within that 168 houses is full. Some are overcrowded and some are perfect. That's where that information has to be relayed. I see the benefits of this, but I also see it as an opportunity or an avenue of whoever is reading it to really pay attention to what life is within the community.

Q: In terms of the degrees to which the existing houses are occupied – some of the standard measures are the # of persons per houses or the # of households per house? Is that information available?

A: I don't have it at my fingertips, but we can probably get you a pretty accurate spreadsheet or a couple of paragraphs of what it really looks like. (Mark: That would be helpful if that can be easily done; we want to move this forward as we can and if we can get a hold of that information, it would be useful).

Q: Another measure which might be supportive, would be waitlists. Are there waitlists due to overcrowding due to existing stock or maybe they are outside of the community and want to come back?

A: Yes, I recently got an updated one. We just did this the other day. Theresa looks after the housing day-to-day where myself I'm more in the capital stuff. She is more of the person to look after that. I'll give you a snapshot on the categories that we have. In our community, there are a few different programs that we offer. There is ability for anybody to go and grab their own funding/mortgage (Section 10). There is a group of people who are seniors who are looking to rent their own single-bedroom or two-bedroom place whether it is within a duplex or multiplex or a single unit. Section 95 (CMHC) there are 8 people on that list (mortgage continuation). There are 15 or so waiting. We compile a list (generic application) and then we try to fit them in where we feel where they would have the most success. Some of them are working or have employment where they would qualify for a mortgage; we provide them with a lot and then, from there, they provide us with plans, we may be able to help them find contractors. Basically, they hold the mortgage. The First Nation becomes the guarantor. There are different categories that people fit into. Some people are desperate because there isn't a lot of housing out there. Marathon is in a crisis too – anything that is rentable is rented; anything that is for sale, is

sold. Some people fit under multiple headings. Some people have outgrown their house (family has grown, looking for something bigger). Once they move up, then it allows somebody else below them to move up. The need is there. Out of all of those headings, there are probably 40 or so on the waitlist (that would be the total demand). One person might be on here twice, but not more than twice. Our immediate need – we could fill another 30 units with this list (i.e. if we had another 30 units tomorrow, we would be able to fill those immediately).

The people who want to come home, but this is a big hurdle, they are really excited about the project so close to home. Hemlo gold camp, to this date, still offers employment opportunities. But we are stuck because we have nothing to offer in terms of housing.

Q: Back in 2020, we were told that there were plans to develop 4 new units with construction starting in 2021. Has there been any other developments?

A: We are still in the application process for that; this is the 3rd phase of it – just completed the application last month. We are not certain yet if it will happen; I anticipate anytime in the new fiscal year, we will get that announcement to construct those units. We are seeing hurdles with the availability of workforce; building materials will jeopardize that project, things like 2x4s, plywood, etc. – costs have increased. It's not looking great, but we are keeping hope. One was a duplex (2 separate units), one was a multi-bedroom (4-bdrm single family); one was a 2-bdrm home. There is no guarantee that the funding will be approved.^[SP1] It is only three units, not four.

Q: In addition to those four units, were there plans to build any additional units?

A: What our hurdle is right now, is that every lot that we had is occupied. So, the biggest hurdle right now (I'm working with Dave from PlanLab) – we are working on a plan for a new subdivision. It's a plan; there's no guarantee, we don't know where we are going to get the capital to do it. It is in the planning stages. We need a minimum of 50-60 more lots just to look at our immediate needs and possibly for 10 years after that; our next 20 years of housing.

Q: Is there land available to accommodate new home construction? Are there challenges to develop new housing?

A: Yes, but in planning (see above). Challenges – availability of land (planning), and funding. For the last project, we had to go out and demolish condemned units to make room for the new units. In November 2020, CMHC announced an initiative (rapid housing initiative). What that was doing was grant money. We had to come up with some capital (up to \$1Million) but the whole idea was that the communities (not limited to First Nations) had to have existing lots ready to go (hydro, water, sewer – serviced lots) – and that was one of the programs that we could not access because we did not have the ability.

Q: This particular project – if this project moves ahead - we are interested in knowing how many additional homes you might need for BN members returning to the community because of the project?

A: With our existing demand – I used a figure of 30. Probably another 30 on the shallow end and on the high end 60. Everyone is prepared – even with the Hemlo Camp – the employment out there with the labour services agreement. There are a lot of our membership out there that are working out there. These people are young – single with no families. My house back 20 years ago (6 bedroom house). I have 7 adults and a grandchild living in my house now.

Q: What is currently there for water and sewer infrastructure – how old, what condition?

A: Our current potable water plant produces roughly 120 m³/day. Our current reservoir is around 330m³. On a given day, we produce enough to maintain the level in the reservoir to deliver potable water. Factors that work against us. We are getting into water break season (March) where the aging infrastructure (in-ground piping has been there since the 1970s). Our water plant is not that old, but it was built in the 1980s and past it's life expectancy. One of our challenges right now is that the ability to leak – once the volume in the plant turns around and drops below a certain threshold, we automatically go into a boil water advisory because we cannot treat water fast enough to provide enough water on a given day. It is very challenging to maintain and not get into an adverse condition. We usually have one or two grass fires or a house fire which really – anytime the fire truck has to access the potable water, we go into an adverse situation. The reservoir is so small, people are consuming it right now. It doesn't get the contact time for the chlorine to do its duty; people are consuming it as quick as we make it. It takes probably a week and a half of no more hiccups where we can gain it and then, once we are past the threshold of 70-80% of the wet well capacity, then we are off the boil water advisory. It's a real balancing act. One of the things I really want to make note of – if we can add these homes – these new homes will just add to the demand and the challenges of maintaining that threshold to supply potable water. We don't think we have the volume to be able to add 30 new houses (not enough to provide capacity to the subdivision). It will add to the inability to make safe potable water. We will see a lot more adverse conditions; we have been decent.

Q: What is the situation with respect to sewer infrastructure?

A: Our sewage here in every home in every commercial building (including our offices, schools, daycares) – they are all on private septic fields. We are basically running out of space. Homes are starting to get into – a septic field if properly maintained, has a life expectancy of 25 years. As things age, they get plugged up and then we have to turn around and construct a new one. We have identified that, eventually, the need for a central sewage treatment facility will be a must. Possibly a lagoon type of system. It is really constricting. There is talk of all of these opportunities with the Gen PGM project, but we are really bottle-necked in our ability to get rid of the waste in this type of facility.

Q: Can you confirm how many members currently living off-Reserve might move back to the community if this project goes ahead?

Debi: We have 1200 members on our list; only about 500 members in our community. We have members living in Thunder Bay, Manitouwadge, even Toronto. We just don't know how many. That's information that we're trying to gather and trying to understand now, to engage our off-Reserve population. We really don't have those numbers right now.

Q: Tabatha: Right now, I heard that in the housing, there are too many people. If the house was built for 4 people, how much, on average, is the overcrowding?

A: We can probably do a quick exercise with the help of Theresa with regards to identifying those numbers specifically. You know, a 4-bedroom home maybe with the amount of people would require a 6-bedroom? With a little bit of work, we could get you a pretty close to accurate number, we could probably do that. On-Reserve, we know everybody, so I think we could come up with something like that pretty quickly.

Q: Anything else that you heard me say or somebody else say that we should know?

A: No, nothing else that we can think of.

Dan: We have a new water treatment plant and a school in the design phase, but the challenge is that the water treatment plant doesn't have the capacity to service those. I don't really want that captured; I want to capture current conditions. The school may not happen; we know the challenges of construction. All we are doing now is designing it. We are in the same design phase of the WTP; still have to go for Government approval to get the funding for it.

Dan: Regarding the availability of land in the community – there is existing land in the community (enough for a 50-60 lot subdivision) – it is just that the land is in the planning phase and is not serviced (so it is not shovel-ready). The community (BN and Marathon) is at capacity. Other projects (i.e., East-West Tie) are putting a strain on the available resources. Housing and water system is over capacity.

BNA 2021 Update – Health & Social Services – March 2021

Biigtigong Nishnaabeg Health and Social Services operates out of the Biigtigong Mno-zhi-yaawgamig, which was built in 2018. It has a staff of 26 working among four program areas: health, social services, home and community care, and North East mental health and crisis response team. The community health services offered focus on health promotion and disease prevention – programs such as diabetes, prenatal nutrition, immunization, and Indigenous healing and wellness are offered. Staff at the centre include a director, three program managers, community health nurse and home visiting nurse, medical van drivers, dental hygienist, addictions worker, band representative, personal support worker, home support worker and administrative staff. Biigtigong Nishnaabeg members requiring medical treatment can access health services at the Wilson Memorial General Hospital in Marathon and the Marathon Family Health Team, which is a clinic which is a Family Health Team. Two family physicians from Marathon alternate visits to the community every Tuesday so BN members have the option to see the visiting physician or attend health facilities in Marathon. In addition to the weekly visits from family physicians, the community also receives visiting specialists such as dieticians, diabetes educators, foot care specialist, mental health counsellors and traditional healers. The Biigtigong Nishnaabeg Health Centre operates Monday-Friday 8:30 to 4:30 and offers some evening and weekend programs.

The community signed a Health Transfer Agreement with ISC-First Nations and Inuit Health Branch in May 1997, which was renewed for another five years in 2017. This agreement allows for increased autonomy in determining what types of health care services are provided in the community to meet the needs of members. In 2018, Biigtigong Nishnaabeg became the host community for the North East Mental Wellness & Crisis Response Team for the communities of Pays Plat First Nation, Michipicoten First Nation, Pic Mobert First Nation, and Biigtigong Nishnaabeg. This team responds to crisis situations and provides ongoing mental health services to individuals, groups, and families affiliated with these four communities. The North East Mental Wellness & Crisis Response Team hosts a 24-hour crisis line for members of these communities in distress.

In 2019, Biigtigong Nishnaabeg signed a Memorandum of Understanding with Dilico for regularly scheduled visits to the community by their Primary Care Travelling Team. This team provides a collaborative health care team approach and provides the community members of Biigtigong Nishnaabeg with access to a nurse practitioner, pharmacist, social worker, chiropractor, traditional healing liaison, registered dietician, psychologist, mental health nurse, and a registered Practical Nurse.

The Home and Community Care Program provides intake assessments, home and clinic visits, health teaching to individuals and families, screening clinics for blood pressure and blood sugars, and footcare services.

The Biigtigong Nishnaabeg Social Service Program provides the following services to the community members:

- One-on-one counselling using various treatment modalities and addressing a variety of mental health concerns
- Advocacy
- Workshops & presentations
- Family Support
- Band representation for child protection
- 50+ Programming
- School Programming

- Crisis Counselling, Intervention, and follow-up
- Case Management

Biigtigong Nishnaabeg members have access to the Biidaaban Healing Lodge, a 12-unit facility which offers treatment for anger solutions, grief and abandonment, sexual abuse survivors and outreach programs. Biidaabin Healing Lodge services nine communities in the Robinson Superior Treaty area. In addition to traditional healing, Aboriginal Health for Members of BN relates to their land-based activities, language and culture which are instrumental for personal and community Anishinaabe identity, as well as healthy living and food security. In the past, people moved away from traditional foods to less healthy foods like flour, sugar, and salt, which have had detrimental impacts on the health of community members. Food security in the form of traditional foods like moose and fish is essential for BN Members.

Chronic disease is the main health concern in the community, and this includes diabetes, heart disease and immune disorders. Healthy living programs, traditional hunting camps, and other programs promoting nutrition (including prenatal nutrition), and physical activity are offered in the community.

In 2018, the old health centre building was replaced by a larger modern building which offers more space for programs delivery to community and for staff to operate.

The addition of the North East Mental Health and Crisis Response team has helped greatly with mental issues in the community and access to some services although these issues are still prevalent in the community. Residential mental health and addiction treatment are not available on-reserve and BN members must travel out of community for this sort of treatment.

Overall summary of concerns with respect to health (these issues will be added to the results of engagement section of the assessment):

- Project-related employment will lead to socially irresponsible spending and drug use which may lead to increased demands on health services, particularly mental health workers.
- An influx of additional BN Members could put a strain on local and regional services and programs.
- Staff hiring and retention is challenging, and existing staff suffer from burn-out from general workload. This issue has been enhanced in the past by large resource projects in the area due to additional requests for support from Health Centre staff, including employee drug testing and issues related to Project-related employment of community members.
- Recreation a priority for all ages across the lifespan for healthy lifestyle, having facilities to deliver the programs is critical. There is a small youth and elder centre, outdoor rink in winter, ball field, and community hall. The community hall serves as a gym facility for the school as well as the facility to host other recreational activities.

Biigtigong Nishnaabeg Education Department Summary – April 1, 2021

Children & Family Learning Center

This program encompasses a daily care program that provides daycare to children from 8:15-4:30pm as well as an outreach program that offers support to families through presentations, workshops, therapy with external providers, and other healthy family initiatives.

The center is a licensed center inspected by the Ontario Ministry of Education. It is licensed to hold 32 children but since the inception of the outreach programming there has not been the space to accommodate both daily care and outreach services to the maximum amount. The center is in need of physical expansion for administration offices and space for outreach programming. There are 3 infant spaces, 5 toddler spaces, 16 preschool spaces, and 8 school aged spaces (after school programming). Prior to COVID all spaces were near capacity with the infant and toddler program being full, and only the preschool and school aged program with some openings. At that time there were 24 children enrolled. With COVID guidelines we have had to reduce these numbers to 11 children and there is currently a waiting list for spots. Between the daily care and outreach program the center serves 30 families.

Staffing is of serious concern. With Ministry guidelines qualified staff that hold an ECE diploma is of priority. The community is limited in staff and have expanded to employing outside community staff to fulfill roles. At present, with COVID restrictions there is one staff per age group who is not qualified and there is no casual list when staff are sick. The center closes when there are staff shortages.

The plan was to expand the physical building to attach to the new school and increase space for programming and administrative space but funding was not approved for this project.

Elementary School

The original section of the school was built in 1950s, with an extension and renovations in 1983. The main building has 4 main classrooms on the main level and 2 offices and a small kitchen that serves as a coffee room for staff. There is no gym, the students must walk to the community hall for their physed program. The basement is used for storage, a library, and a resource room for the special education program. The basement does not meet accessibility codes There is was not enough space in the main building for the student population so two portables were added to the site in the early 1993. The two portables house a grade7/8 class in one and an alternative high school program and admin offices in the other. The main school building has maintenance issues, including ventilation, roofing, and plumbing issues, as well as high lead content in the water pipes. The portables are rotting underneath due to mold issues.

BN is in talks with ISC and a feasibility study has been completed for a new school but we have yet to see the new school project start.

Student population currently is at 68 students, but recent COVID guidelines have caused a split in the classroom set up due to numbers in one classroom, so the basement library is serving as a

classroom. Enrollment rates are steady at about 2% increase each year. Out of the student population 35-40% need special education services, with some of the most need coming from an increase in autistic students and students born with effects from substance use.

Staff retention is satisfactory, staff recruitment is of serious concern. There are currently no qualified teachers or EAs on the supply list, and very little people apply to work when job postings become available. The rates of pay and conditions are not as competitive as the local town schools. There are 5 teachers and 5 EAs, one Special Education teacher and all classrooms are operating a split grade system. When there is a shortage of teachers/support staff, classes double up or the administrative staff will teach.

The school strives to provide education to their students at or above the provincial standards; although on-reserve schools are not subject to provincial standardized testing, they have implemented testing to understand the baseline conditions among students. Ojibway classes are offered to students at the elementary school, with funding shared with the day care program. The teachers try to teach in a culturally appropriate way and incorporate traditional Aboriginal knowledge in all courses where possible. BN would like to formalize their approach to cultural programming and have a long-term goal of implementing their own land-based curriculum, including an outdoor component, at the elementary school level.

Secondary School Program

High school is not offered on-reserve. Approximately 25 BN students attend high school in the Town of Marathon through a tuition agreement; in previous years this number has been as high as 45 students. A bus picks students up in the community to take to Marathon HS daily for classes. The Band has an attendance councillor in Marathon to keep track of student attendance and performance. New school would like to have a high school attached to keep grade 9s and 10s in community.

The alternative high school that exists in the community is an inspected Ontario Ministry school program mainly for adult students and students who can't function in typical high school. The alternative high school has only one teacher that also serves as the principal. This program can grant locally developed courses and Ontario Secondary School Diplomas. This is a self-funded program with no funding from the federal government. Current enrollment is 28 students both off and on reserve and in virtual and classes. This is housed in the portable on site.

Graduation rates for BN members are similar to rates for the province, although BN students tend to take five years to graduate rather than the standard four years. Improved graduation rates are partially attributed to the fact that all Band employees are required to have a Grade 12 education.

Post-Secondary Education

BN funds approximately 45 students annually for PSE, although more students apply for funding. Programs are outside the community and currently BN denies 6 to 10 each year.

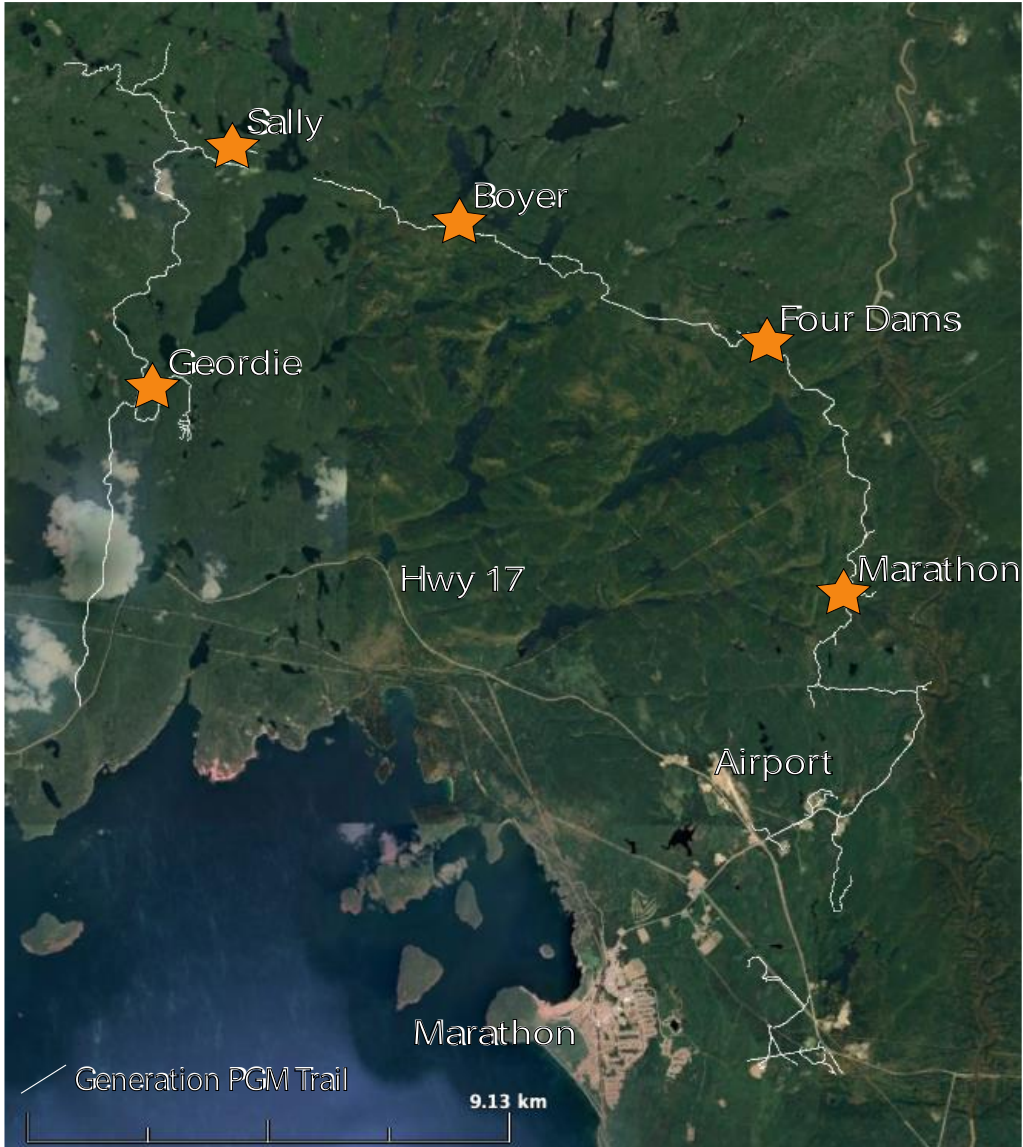
Members are enrolled in a variety of programs, including nursing degrees, social sciences, and trade programs. Among the communities where students have attended PSE programs are Thunder Bay, Sudbury, Sault Ste Marie, Ottawa, London, to name a few. Currently funding 45 students.

GENERATION PGM

Exploration Update

April 2021

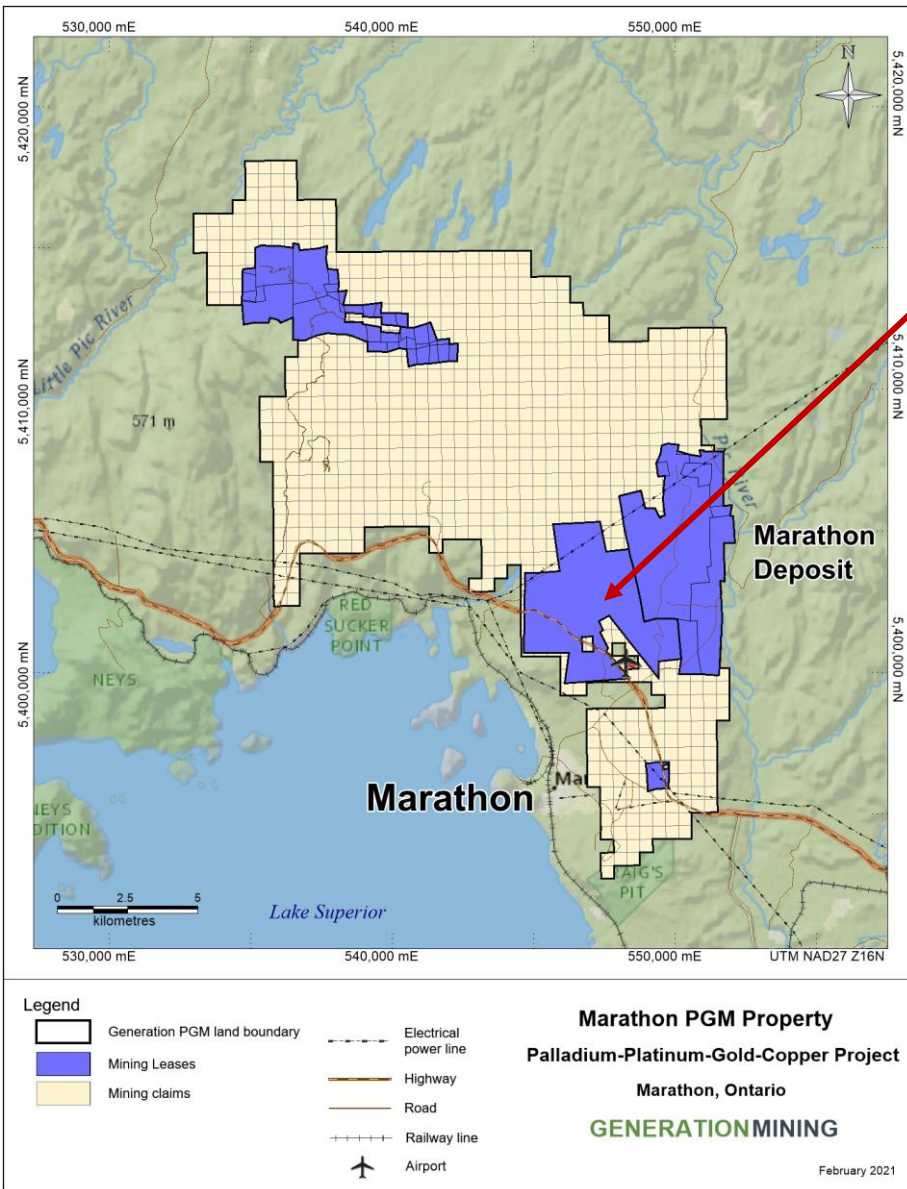




- Generation PGM Property
- 2021 Winter Drill Program – complete
- 2021 Summer Work Program – proposed
- Environmental Permitting
- Environmental Mitigation and Monitoring

Marathon PGM Property

GENERATION PGM

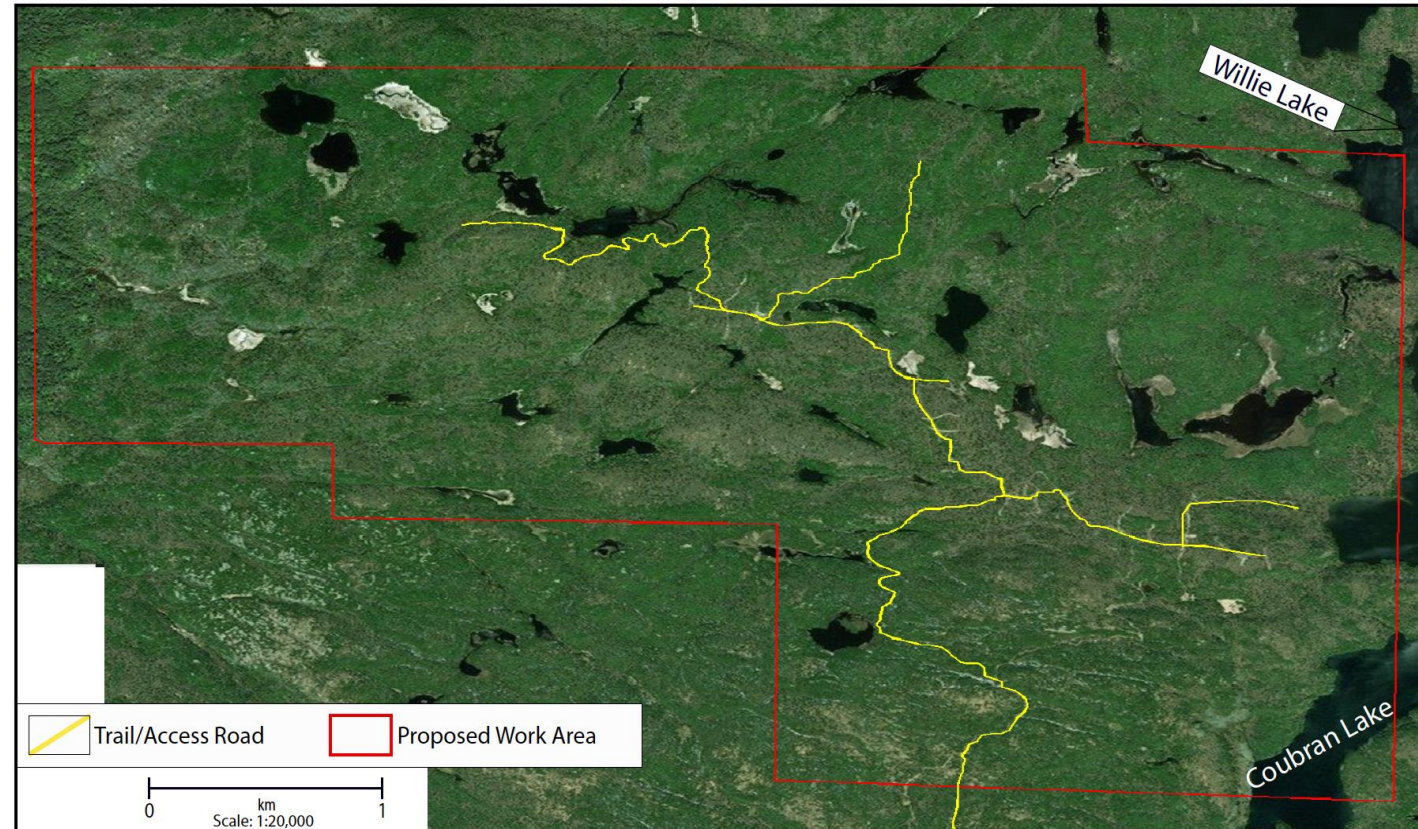


- Completed a conversion of legacy claims to Lease CLM509
- No other changes planned for the property boundary, claims or leases in 2021
- Final boundaries and claim lists pending from MENDM



Sally Work Area

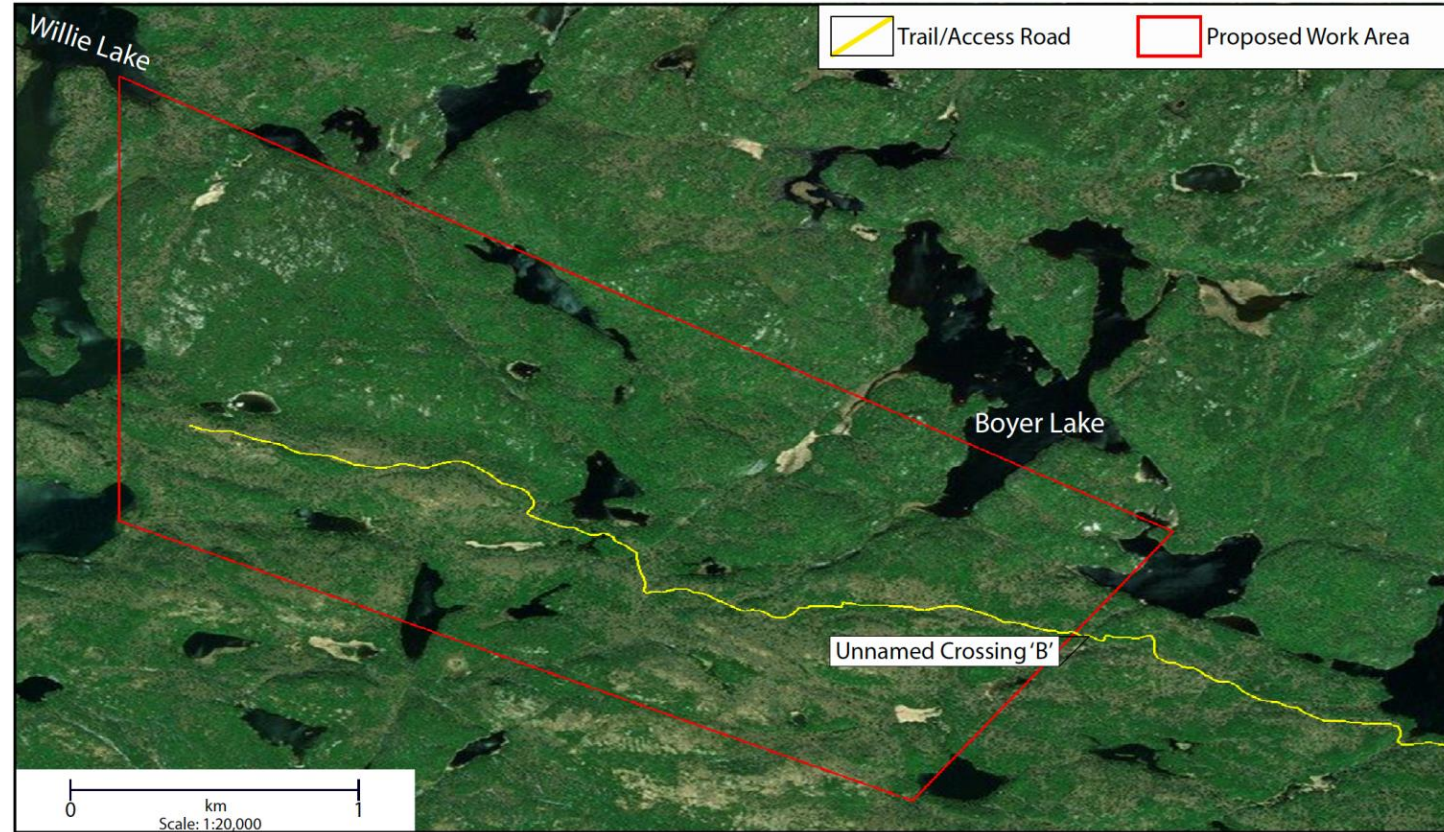
- Work area is accessed by UTVs along a trail network from Highway 17 (yellow lines)



Boyer Work Area



- Work area is accessed by UTVs along a trail network from the Marathon Project (yellow lines)



Marathon Work Area

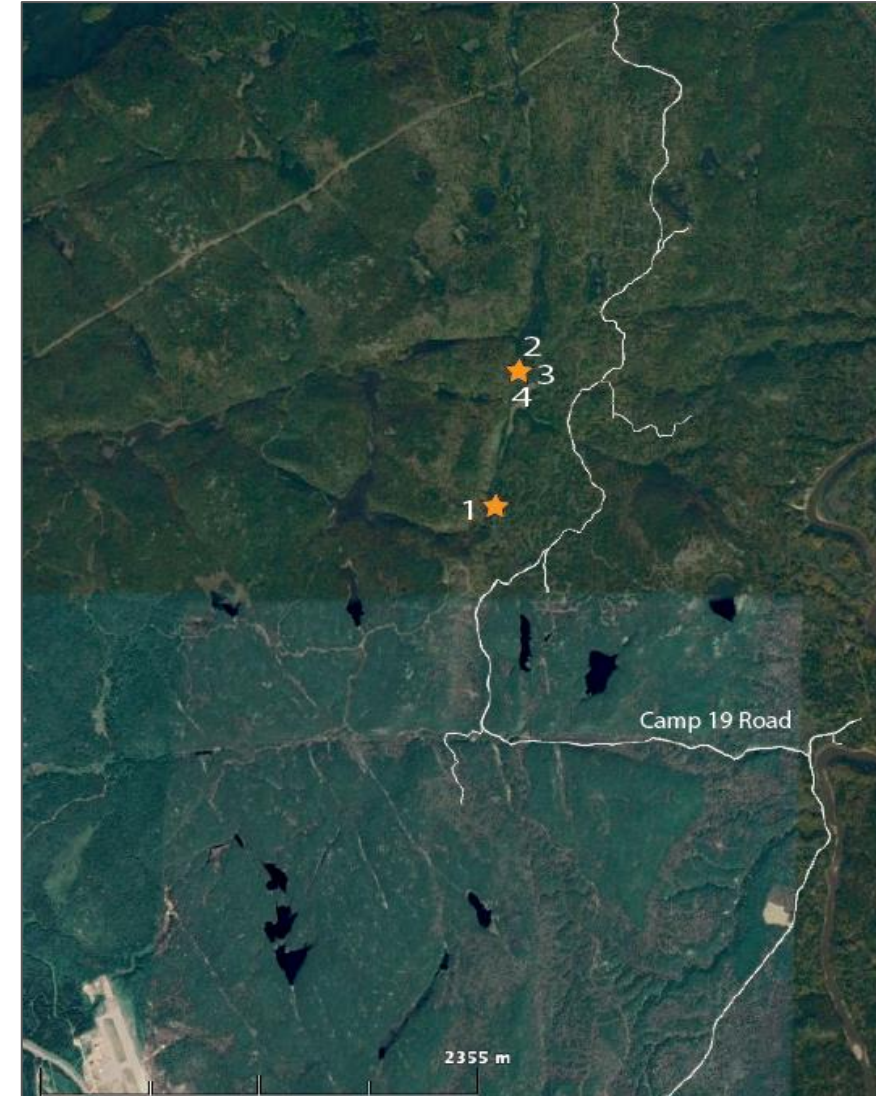
- Work area is accessed by trucks and UTVs along a trail network extending from Camp 19 Road (yellow lines)



2021 Winter Program

Winter Program conducted in February & March

- Completed 2003 m of diamond drilling at Marathon
- 4 holes completed on 2 targets



Proposed Exploration Summer 2021 **GENERATIONPGM**



- 8000 m of diamond drilling on 2 zones, from May 15th to August 31st, following up from the Winter program (2 Drillers & 2 Helpers + 1 Foreman)
- In hole electromagnetic geophysics will occur on select holes
- LIDAR survey to be flown over Generation's claims to acquire accurate topographic information, starting May 1st
- Field mapping from May 15th – September (1 Geologist & 2 Geology Students)
- Processing and mapping stripped areas from 2019 & 2020, from June 1st – August (3-person crew)

Sally

Field Mapping

Boyer

Field Mapping and Trenching

Marathon

Diamond Drilling, Geophysics and Trenching

Four Dams

Field Mapping

Geordie

No Planned Activities

Blasting at Sally Deposit – April / May 2021

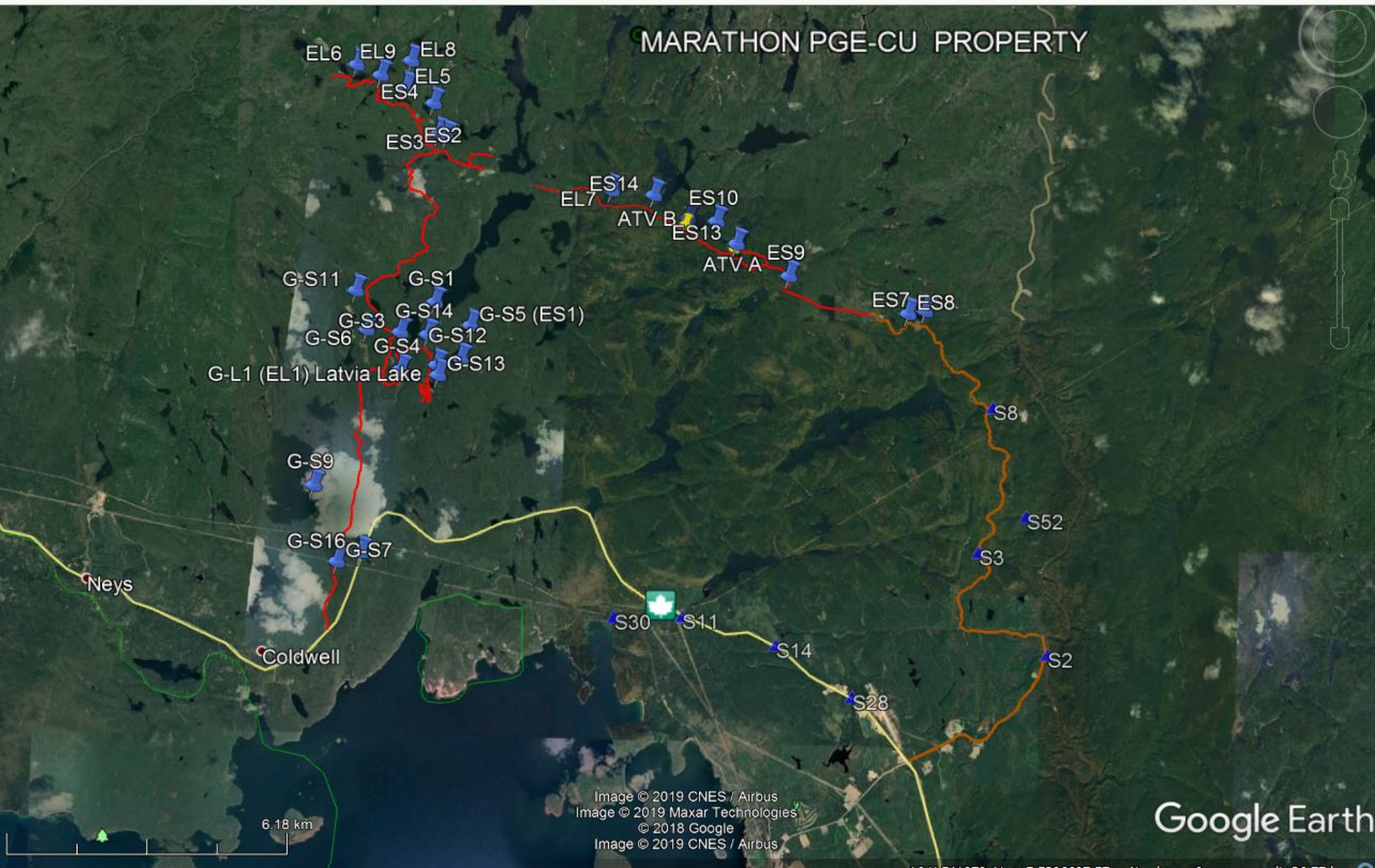
- Geordie trail currently impassible for UTV and heavy equipment – has become a safety concern
- A portion of outcrop will need to be leveled by blasting (lack of material to build up the road)
- The blasted material will remain on-site and used in place to create a passible trail
- This trail will continue to be only accessible by ATV, UTV and heavy equipment



- Annual Authorization for equipment to ford streams and low water crossings in Boyer area have been completed with the MNRF
- Four **Permits to Take Water** will be active in May 2021 that will allow up to 100,00L/day of water usage with an average of two working drills. The permits are for potential drill programs at Marathon, Boyer, Sally and Geordie

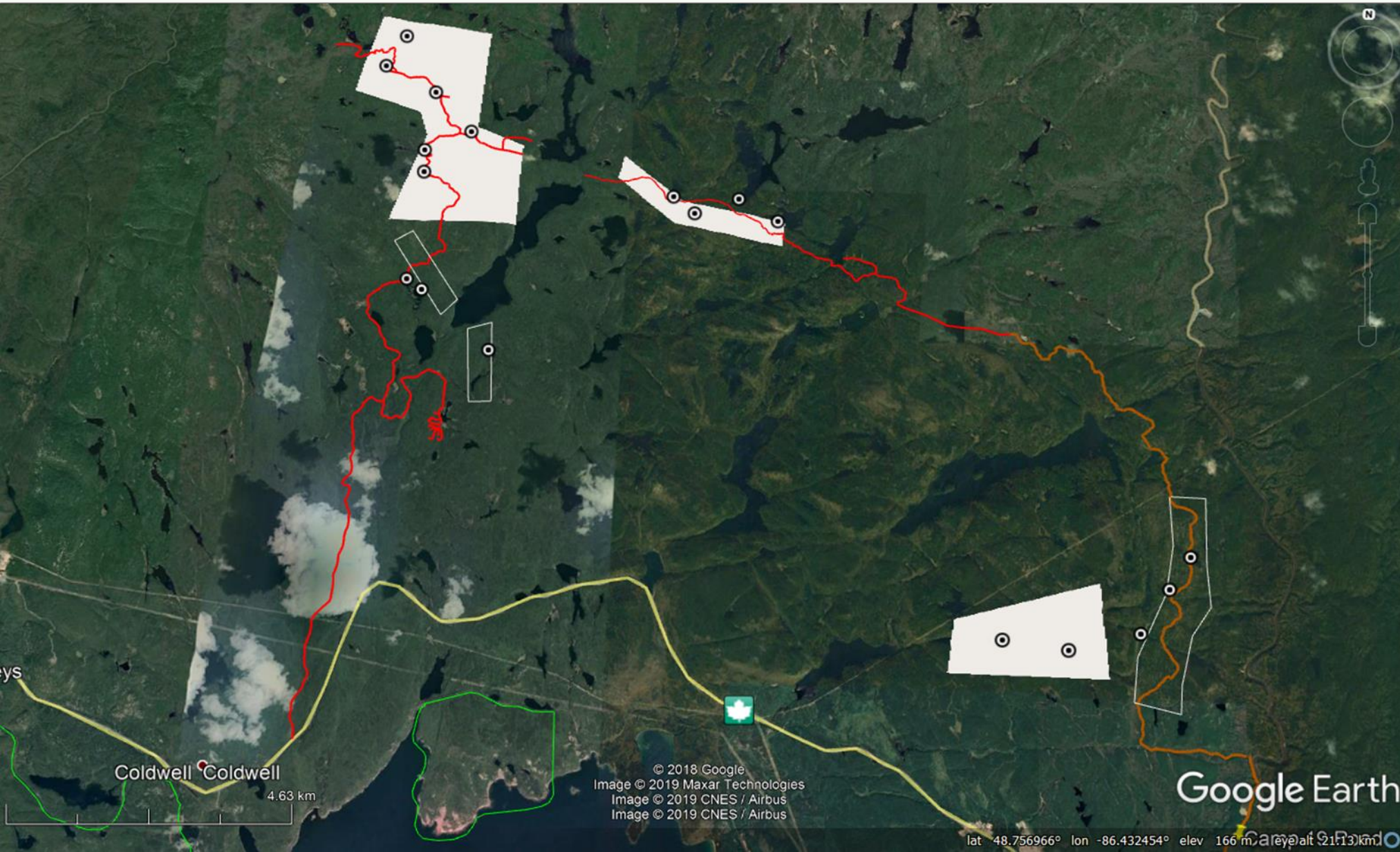


2021 Water Sampling Locations



- Exploration surface water sampling stations

2021 Water Taking Locations



- Locations identified to take water for exploration activities

Water Monitoring

- Flow stations and water sampling at major water shed outlets (8 locations) and through exploration areas (Boyer, Sally, Marathon Zones). A reduced program exists at Geordie Zone.

Mitigation Plan

- Measures in place to minimize impacts to species at risk including Woodland Caribou Habitat, Long-eared Bat and Little Brown Bat.

Environmental Site Inspections

- Inspections for trails, bridges, water crossings, aggregate pit and other aspects of property to ensure no degradation is occurring. Continue with some level of baseline studies and monitoring throughout each zone.

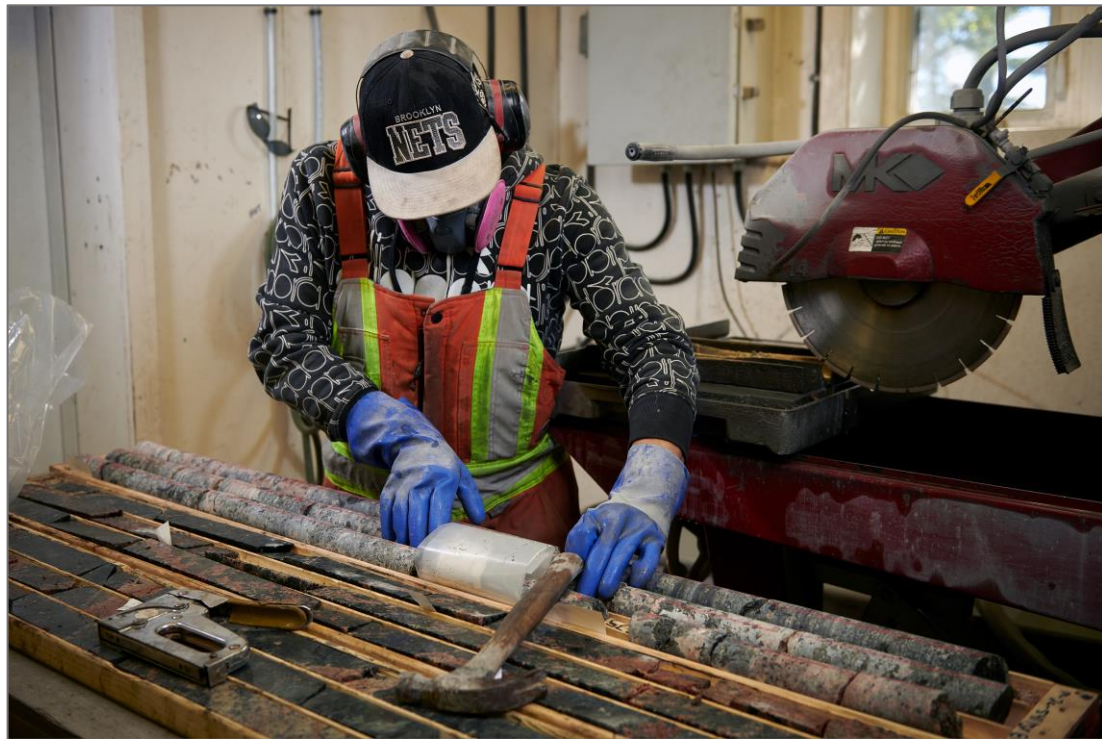
Site Remediation

- Approximately \$15,000 annually to infill stripped areas, seed and remodel drill pads.



Jobs

- Exploration will require geologists, geotechnicians, core cutters and general labour



Environmental Monitoring

- Report sharing, meetings and community updates
- Direct participation in environmental monitoring and site inspections
 - Bat box building
 - Plant transplant programs
 - Water sample shadowing

John McBride
Senior Project Geologist

<contact information removed>

April 14 2021

Closure Planning

MARATHON PALLADIUM PROJECT

Monthly Environmental Update

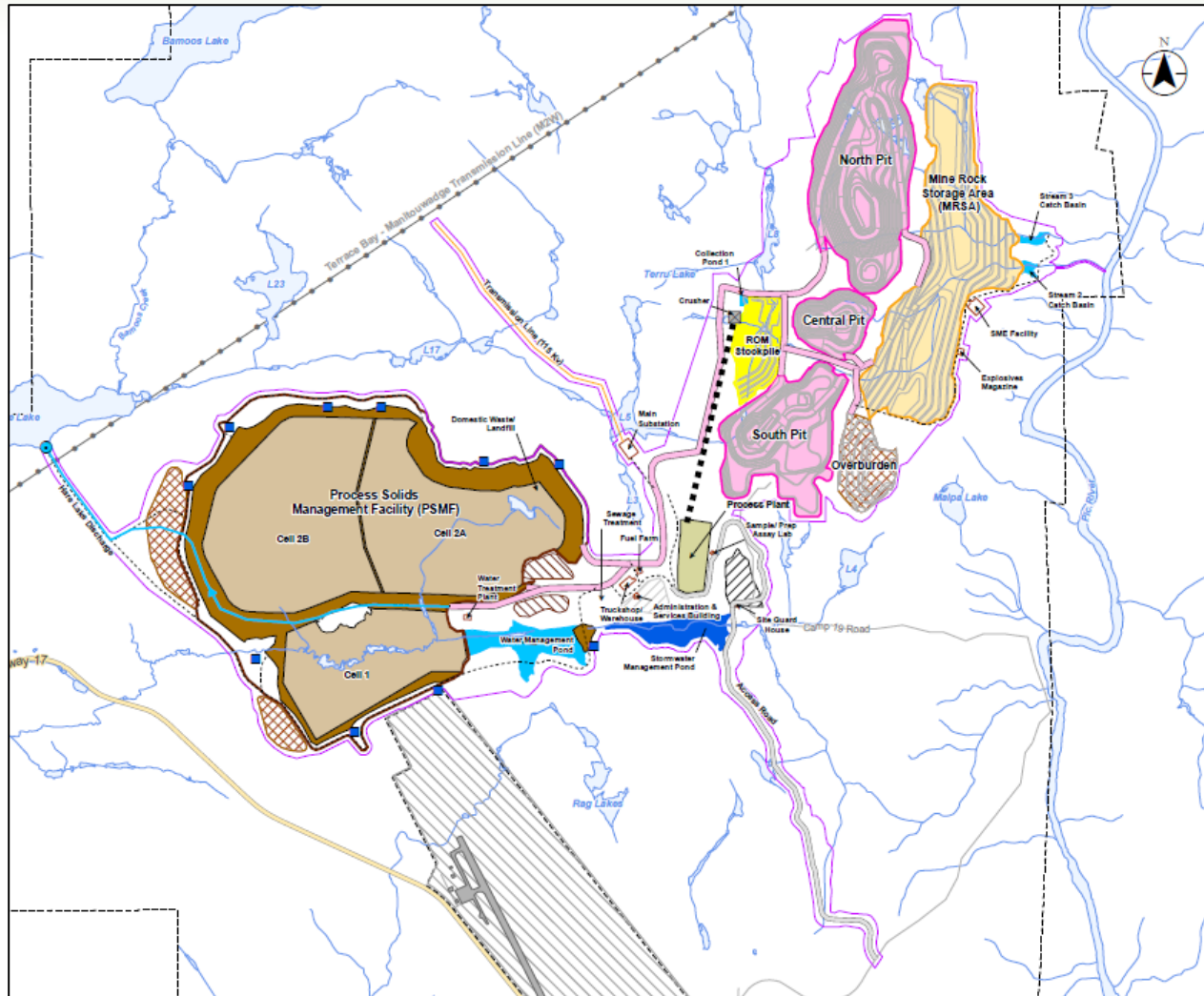
GENERATION PGM



AGENDA

- Exploration Update
- File Sharing Site
- Mine Rehabilitation Code
- Closure Schedule and Cost
- Key Components
 - Open Pits
 - Roads and Buildings
 - PSMF + MRSA





Proposed Project Footprint

Three planned open pits (central, north and south)

- Measured and indicated resources 179.2 M tonnes
- PSMF, water management ponds and stockpiles

Mine rock storage area

- 85-90% non-acid generating mine rock
- Long term PAG storage in PSMF and open pits

Process plant facility

- 25,200 tonnes per day

2.2 km of new transmission line

2.5 km of new access road

Excess water will be treated and discharged to Hare Lake

Designed to:

- Reclaim land within the Project footprint
- Maximize future use by plants and animals
- Consider access for traditional and other land-use activities
- Reduce impacts to the natural environment
- Reflect the interests of Indigenous people, the public and government.

CLOSURE PLAN PROCESS (MINING ACT) GENERATION PGM

Consultation

- MENDM provides consultation guidance to proponent
- Proponent submits Consultation Work Plan to MENDM for approval
- Proponent consults with Indigenous Communities to identify and address any concerns
- Proponent submits Consultation Report to MENDM for Approval

Public Information Session

- Proponent holds general public information session to identify and address concerns

Technical Review

- Proponent submits draft closure plan to MENDM to identify and resolve comments

File Closure Plan

- MENDM advises proponent they may submit closure plan for filing after Consultation Report is accepted
- Proponent submits closure plan with financial assurance to MENDM for filing (45 day turn around time); the closure plan is subject to a multi-agency review process
- Closure Plan is filed by MENDM and development may commence (ancillary permits are still required under other legislation for a variety of specific activities)

MINE REHABILITATION CODE OF ONTARIO

Mine Rehabilitation Code of Ontario (Code) is published in Ontario Regulation 240/00 (as amended) and provides standards for mine rehabilitation. <https://www.mndm.gov.on.ca/en/mines-and-minerals/mining-act>

The Code addresses all components of a mine development to ensure a site is safe, physically stable and chemically stable (*i.e.* mitigate risk of acid rock drainage and metal leaching) site after rehabilitation work is completed at closure.

- Crown pillar & underground workings, mine openings, open pits
- Tailings impoundment areas, water impoundments, rock piles
- Building and infrastructure removal
- Machinery, equipment, storage tanks
- Petroleum products, chemicals, explosives
- Waste management sites, wastes
- Remediation of contaminated soil
- Protection of ground water quality
- Protection of surface water quality
- Re-vegetation
- Monitoring program



- Plan for submission April 2022
- Existing closure plan from 2012 (True Grit Consulting)
- **Progressive reclamation** will be undertaken during operations.
- **Active closure** is expected to be completed within 5 years
- **Long term monitoring** of the site estimated for 40 years.
- Financial assurance of estimated \$60 million will be required

Key Components

- Buildings and Roads
- Open Pits
- Process Solids Management Facility
- Mine Rock Storage Areas



All buildings, power lines, pipelines, waterlines and other structures will be dismantled and removed.

Concrete rubble will be deposited in the main pit.

Material will be recycled, sold, removed to the on-site disposal area or removed off-site as appropriate.

The site roads will be maintained to allow inspections and maintenance.

The main access road will be decommissioned

Site access will resume using former access and gated entrance along Camp 19 access road.

- Flooding
- Boulder Fencing
- Backfilling

The South and Central pits will be capped with Type 1 mine rock cover.

Stream channels and fish habitat will be created in the SWM Pond

Water will drain from the South and Central Pits into the North Pit.

An outlet stream will be created on the eastern side of the North Pit to drain into Subwatershed 103.

A boulder barrier will be constructed around the perimeter of the North Pit and warning signs will be posted.

- Progressive reclamation will take place after the process solids deposition has been transitioned to the Satellite Pits.
- Re-grading and the creation of channels to restore the natural drainage patterns
- Establish vegetation on re-graded embankment areas and over the surface of the PSMF
- Ongoing monitoring of the PMSF for a period of time sufficient to confirm suitable water quality and ongoing stability of the facility
- Water Management Pond will be flooded.

MRSA

- Contour slopes to minimize erosion
- Minimize standing water on top of MRSA
- Establish vegetative cover over the crest and slope benches
- Ongoing monitoring of the MRSA to confirm water quality and stability

A mine site re-vegetation program will be implemented that:

- Stabilizes disturbed surface areas to minimize erosion;
- Provides a self-sustaining cover;
- Enhances terrestrial habitat;
- Supports the end use of the site; and,
- Improves the aesthetic appearance of the site.

The program will involve:

- Scarification of roadways and other compacted areas;
- Improving stability and aesthetics;
- Application of soil cover where required;
- Application of soil amendments as required; and,
- Use of local species whenever and wherever possible.

Lakehead University greenhouse revegetation trials on tailings were undertaken in 2009.

The results showed that fertilizer and natural forest soil amendments improved plant growth significantly over unamended tailings.

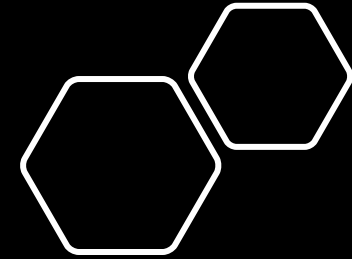
Long Term Monitoring

A detailed monitoring plan will be developed that will focus on evaluating:

- The physical integrity of permanent man-made structures (e.g., dams safety inspections)
- The relative success of the implementation of closure and reclamation activities (e.g., revegetation success)
- The potential effects of the closed mine site on the environment (e.g., surface water and groundwater quality monitoring)



GENERATIONPGM



More Information on the Project can be found at

www.genmining.com

and the Impact Assessment Registry at

<https://iaac-aeic.gc.ca/050/evaluations/proj/54755?culture=en-CA>

**If you have additional questions,
please email us at comments@genpgm.com**

Closure Planning

Generation Mining – Group Consultation Monthly Meeting 14 April 2021 10AM to 11:30AM

Participants: N. Nesbitt, Jon - spokesperson (Jackfish Metis), P. McGuire (Cpt of Hunt for MNO), T. Sinclair (Regional Councillor and consultation for MNO), Torch (MNO), V. Stinson (MNO Mining Manager), Trudy (MNO women's mining rep), D. Delaronde & C. Kurcinka (Red Sky), D. Elliot (Economic Dev for Marathon), C. Hovi (ENDM), T. Leblanc, D. Boyd. Trent Desaulniers (MNO) joined late.

Moderators: C. Moffet

Presenters: C. Moffet, D. Boyd

Meeting Notes & Covered Topics:

- C. Boucher gave intro to Exploration Update presentation
- T. Leblanc showed the Environmental Committee Sharepoint database to be ready for public use soon and the intent of the environmental committee, the site should go live by May
- Gave notice that the EIS Volume 2 Submission should be submitted this week
- no suggestions about where else to publish our information beyond what we are currently doing (Wawatay News, Marathon newspaper, trying for Metis Voyageur, Red Sky website), MNO newsletter is now quarterly
- Project description with planned pits, infrastructure and water discharge plan
- Conceptual Closure Plan: Reclaim land within footprint, maximize future uses by plants/animals, reduce impacts, consider future access for traditional land use, consider Indigenous input
- Closure Plan Process: Consultation, Public Information Session, Technical Review, File Closure Plan with adequate financial assurance. Updates every 5 years as minimum to update the FA
- Mining Rehabilitation Code of Ontario introduced in 2000 that standardized the amount of work a Proponent would be expected to do and include in its closure plan
- Plan to submit Closure Plan April 2022 (a progressive reclamation approach with the active closure expected to take 5 years and long-term monitoring for 40 years)
- All buildings, power lines, pipelines, waterline etc. will be dismantled and removed. Material will be recycled, sold, removed as appropriate.
- Open pits will be boulder fenced in, flooded and backfilled.

-Reclaim on the PSMF cells will occur when the first cell is not being used (a staged approach). Vegetation will be established on embankments and over the surface of the PSMF.

-MRSA slopes will be contoured, and vegetative cover will be established with ongoing monitoring. We want to minimize erosion on all embankments.

-A revegetation program will be implemented that will help stabilize disturbed areas and enhance the terrestrial habitat within the footprint. Fertilizers will be used as required to improve the plant growth over tailings. The use of local species whenever and wherever possible is important.

-Long term monitoring plan will focus on evaluating the physical integrity of structures, the success of the implementation of closure and reclamation (make sure revegetation is succeeding), monitoring the effects of the closed mine site surrounding water quality of surface and groundwater

Comments and Questions:

*Jon before presentation mentioned great support for the project and progressing the process.

*T. Sinclair suggested we use the open pit/ramp for “100-year” flooding events

*Red Sky has been trying to get involved in protecting species at risk (could potentially focus on vegetation that could help bee populations)

What is the planned height of waste rock piles?

There is a need to put effort into getting local seed stock as early as possible in the project life

For future meetings, include context in the invitation (who is invited, what meeting will be about, etc.)