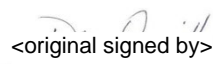
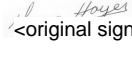


Greenstone Mine

External Stakeholder and Indigenous Community Communications Plan

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Table of Contents

1	Scope	1
2	Purpose	1
3	Roles and Responsibilities	1
4	Stakeholder and Indigenous Groups	Error! Bookmark not defined.
5	Methods of Communication	3
6	Communicating Project Information	5
7	Complaint Protocol.....	9
8	Record Keeping and Reporting.....	9

List of Tables

Table 3-1: Roles and Responsibilities for Communications Plan	1
Table 6-1: Communication of Key Project Information	5

1 Scope

This Communications Plan is a living document that covers the communication procedures to be followed to share information with stakeholders and Indigenous communities for Greenstone Mine, also referred to as the Project and will be updated annually to reflect the Project development status, priorities and goals.

2 Purpose

The purpose of the Greenstone Mine Communication Plan is to support Project success through clear communication implementation between Greenstone Mine, stakeholders and Indigenous communities through the construction, operations and closure activities.

The Communication Plan has been developed for Greenstone Mine based on commitments made throughout the environmental assessment process, conditions of the federal Decision Statement Issued under Section 54 of the *Canadian Environmental Assessment Act, 2012* and conditions of provincial Notice of Approval under the *Ontario Environmental Assessment Act, 1990*.

3 Roles and Responsibilities

The roles and responsibilities for key Greenstone Mine staff responsible for implementing the Communications Plan is provided in Table 3-1.

Table 3-1: Roles and Responsibilities for Communications Plan

Title or Position	Key Responsibilities
General Manager	<ul style="list-style-type: none"> Approves the Communication Plan. Official Spokesperson for Greenstone Mine.
Environmental Superintendent	<ul style="list-style-type: none"> Review of Communications Plan. Oversee implementation of the Communications Plan to facilitate compliance with the plan and environmental permits, regulations, and EA commitments. Participate in Environmental Advisory Sub- Committees and support activities with Indigenous communities. Lead permitting consultation and engagement with Indigenous Relations and Community Relations support as applicable. Share results of follow-ups and monitoring programs with Indigenous communities and relevant authorities. Notify MECP District Manager of formal environmental feedback received.
Manager, Human Resources	<ul style="list-style-type: none"> Review of Communications Plan. Oversee implementation of the Communications Plan to facilitate compliance with best practices.



Title or Position	Key Responsibilities
Manager, Community Relations	<ul style="list-style-type: none"> • Owner of the Communications Plan procedure and related processes. • Develop an internal training strategy for employees and contractors. • Ensure compliance in tracking and reporting on communications with appropriate team members. • Identify when the Feedback Protocol is required to be implemented. • Update Greenstone Mine website with Project information. • Ensure blasting schedule is posted to the website. • Primary contact for media relations.
Senior Manager, Indigenous Relations	<ul style="list-style-type: none"> • Communicate Project information as identified in Table 6-1 and as required to Indigenous communities. • Ensure blasting schedule is provided to Indigenous communities. • Tracking and reporting on communications with Indigenous communities.
Environmental Coordinator	<ul style="list-style-type: none"> • Maintain open dialogue and communication with Environmental Technicians • Support Environmental Technicians in communicating information to their communities.
Environmental Technicians	<ul style="list-style-type: none"> • Review and provide input into the Communications Plan. • Provide input into any future revisions of the Communications Plan and adaptive management as required. • Communicate Project updates and results of monitoring to their community.
Environmental Advisory Sub-Committees (EAS)	<ul style="list-style-type: none"> • Review and provide input into the Communications Plan. • Provide input into any future revisions of the Communications Plan. • Meet regularly and report EAS activities to the Implementation Committee.

4 Stakeholder and Indigenous Groups

Potentially interested stakeholders were initially scoped in during the early stages of the Project. As the Project proceeded through the environmental assessment process, the list has been refined based on interest from stakeholders, direction from government agencies, and feedback from Indigenous communities. Stakeholders included in Greenstone Mine communications include:

- Government regulators: Government regulators will be engaged in accordance with their regulatory mandates by appropriate Greenstone Mine team members
- Municipality of Greenstone
- Land Resource Users (Registered Trapline Areas, Bear Management Areas and Commercial Bait Harvester Areas) located within or near the Greenstone Mine area
- Recreational Facilities and Users
- Surface Rights Owners adjacent to Greenstone Mine

- Health, Education, Workforce, Emergency Medical Services, Business and Economic Development Agencies
- Local residents
- Local and regional businesses

Regularly scheduled communication will continue with the following Indigenous groups as they were identified in the federal Decision Statement and provincial Notice of Approval of the environmental assessment:

- Animbiigoo Zaagi'igan Anishinaabek (AZA): will.metansinine@ggmines.com
- Aroland First Nation (AFN): louie.mendowegan@ggmines.com
- Ginoogaming First Nation (GFN): jason.chapais@ggmines.com
- Long Lake # 58 First Nation (LLFN): TBD
- Métis Nation of Ontario (MNO): ted.pile@ggmines.com
- Red Sky Métis Independent Nation (RSMIN): mda@rsmin.ca

In addition to the communities above, GGM will continue to communicate at key milestones and as requested with the following Indigenous groups that were identified to be potentially affected by the Project:

- Biigtigong Nishnaabeg (BN)
- Biinjitiwaabik Zaaging Anishinaabek (BZA)
- Bingwi Neyaashi Anishinaabek (BNA)
- Constance Lake First Nation (CLFN)
- Eambatoong First Nation (EFN)
- Marten Falls First Nation (MFFN)
- Pays Plat First Nation (PPFN)
- Pic Mobert First Nation (PMFN)

5 Methods of Communication

GGM implements various tools and approaches to communicate Project information in a meaningful manner with the Stakeholders and Indigenous communities.

Communication Methods that are used by GGM include:

- The Greenstone Mine website (<http://www.greenstonegoldmines.com/>) is used for communicating Greenstone Mine updates and information in an open and transparent manner. The website contains a Community Feedback Form where interested parties can provide and receive feedback from the appropriate team member.



- Greenstone Mine has a 24-hour phone line available to accept inquiries and feedback. The site phone number is 866-413-1346.
- The local Community Relations office in Geraldton is available as a location that members of the community can visit and ask questions, seek information, provide input, and discuss concerns.
- The local Community and Indigenous Relations team and members of Greenstone Mine communicate Project information to various stakeholders via email.
- The Community Relations email address is linked to the Project website to provide a forum for interested parties to connect with GGM representatives regarding the Project.
- The Greenstone Mine Newsletter is distributed to the Project contact list quarterly to provide updates on the Project and notify stakeholders of any upcoming events (e.g., information centres).
- Greenstone Mine weekly updates are provided to the local newspaper and added to the company website on a weekly basis, providing information and photos about construction related activities undertaken and work to be conducted in the coming week.
- Project notices and announcements are distributed and published in local newspaper(s), via Canada Post mail-drop and/or through radio ads to relay information about project activities, consultation opportunities and key milestones as appropriate.
- Community Open House events are held to provide opportunities for local residents to learn about the Project, to meet the Greenstone Mine team, to ask questions and provide Project input.
- Meetings are held upon request as an opportunity to supplement information provided by other methods and discussion of any questions or concerns.
- Formal letters/memos may be provided when responding to formal requests/comments and/or distributing Project information.
- Environmental Advisory Sub-Committees include members from local Indigenous communities and meetings are held regularly. The committees review key project documentation, and the meetings provide a forum for communities and GGM to collaborate to resolve any issues and make recommendations. The Environmental Advisory Sub-Committees provide a method for local Indigenous communities to communicate their concerns about potential adverse environmental effects caused by the Project related to access to and use of lands for traditional purposes, including navigation and consumption of country foods. If concerns can not be resolved within the Environmental Advisory Sub-Committee, they will be raised to the Implementation Committee (committees that are in place to implement long-term relationship agreements).
- The Community Sustainability Committee (CSC) will include local Municipality of Greenstone residents and representatives of the Municipality of Greenstone. Meetings will be held quarterly. The CSC is a space for dialogue and information sharing between Greenstone Mine and local residents to discuss upcoming construction and operation activities and how we can maximize on positive economic, social and environmental cohabitation in the Greenstone region.
- Signs will be maintained around the perimeter of the Project to alert local land and resource users of the presence of the Project and its components.

6 Communicating Project Information

Project information will be communicated to relevant stakeholders using the methods and timing as outlined in Table 6-1. Additional stakeholders may receive the listed information upon request.

Table 6-1: Communication of Key Project Information

Item to be Communicated	Who will be Notified	Method(s) of Communication	Approximate Timing of Communication
Results of the follow-up and monitoring programs (including any potential environmental health risks, in plain language, and modified or additional mitigation measures developed and implemented)	<ul style="list-style-type: none"> • AFN, AZA, GFN, LLFN, MNO, RSMIN • MECF • IAA • Ministry of Natural Resources and Forestry (MNRF) 	<ul style="list-style-type: none"> • GGM Website • GGM SharePoint Site • Environmental Advisory Sub-Committee meetings • Email and/or letter 	Annually or as indicated in the relevant EMMP
Project activities, locations and timing throughout construction, operation and closure	<ul style="list-style-type: none"> • Affected land and resource users • Interest groups/ Stakeholders • MNRF • local authorities • Municipality of Greenstone 	<ul style="list-style-type: none"> • Public announcements via local media as required • Email 	No later than 48 hours prior to activities commencing.
The location and timing of activities that may permanently or temporarily affect navigation within the Project area and in the Southwest Arm of Kenogamisis Lake, including the locations of the effluent discharge location and the freshwater intakes in Kenogamisis Lake	<ul style="list-style-type: none"> • Local land and resource users • Interest Groups • MNRF • Local authorities • Public 	<ul style="list-style-type: none"> • Signage around perimeter of Project • Public announcements via local media • Email 	No later than one week prior to activities commencing.
Dates and times of all regularly scheduled blasting events to be conducted by GGM	<ul style="list-style-type: none"> • AFN, AZA, GFN, LLFN, MNO, RSMIN • Local authorities • Municipality of Greenstone • Public 	<ul style="list-style-type: none"> • Environmental Advisory Sub-Committee meetings • GGM internal email • Website 	<p>Blasting schedule to be provided monthly and on a daily basis as they are scheduled to occur.</p> <p>If changes are made to the schedule, the website will be updated.</p>



Item to be Communicated	Who will be Notified	Method(s) of Communication	Approximate Timing of Communication
Annual Compliance Reports	<ul style="list-style-type: none"> • IAA • MECP • AFN, AZA, GFN, LLFN, MNO, RSMIN 	<ul style="list-style-type: none"> • GGM website with email notifying of publication on website • GGM SharePoint Site • Environmental Advisory Sub-Committee meetings • Environmental Technician to communicate to community 	Within 48 hours of publication on the website.
Change to the Project including a description of the potential adverse environmental effects of the change(s) to the Project, the proposed mitigation measures and follow-up requirements to be implemented by GGM	<ul style="list-style-type: none"> • IAA • MECP • AFN, AZA, GFN, LLFN, MNO, RSMIN • Municipality of Greenstone 	<ul style="list-style-type: none"> • GGM website • Email and/or letter • Environmental Advisory Sub-Committee meetings • Environmental Technician to communicate to community 	<ul style="list-style-type: none"> • Consultation with Indigenous communities through the EAS and relevant authorities to occur prior to initiating the change(s). • IAA to be notified in writing no later than 60 days prior to initiating the change(s). • Notification within 2 business days of publication on the website.
Fish Habitat Offsetting Plan(s)	<ul style="list-style-type: none"> • IAA • AFN, AZA, GFN, LLFN, MNO, RSMIN 	<ul style="list-style-type: none"> • GGM website with email notifying of publication on website • Environmental Advisory Sub-Committee meetings • Environmental Technician to communicate to community 	Within 48 hours of publication on the website.
Communications Plan	<ul style="list-style-type: none"> • IAA • MECP • AFN, AZA, GFN, LLFN, MNO, RSMIN • Municipality of Greenstone 	<ul style="list-style-type: none"> • GGM website with email notifying of publication on website • GGM SharePoint Site 	Within 48 hours of publication on the website.



Item to be Communicated	Who will be Notified	Method(s) of Communication	Approximate Timing of Communication
Environmental Management and Monitoring Plans (with the exception of proprietary information)	<ul style="list-style-type: none"> • IAA • MECP • AFN, AZA, GFN, LLFN, MNO, RSMIN 	<ul style="list-style-type: none"> • GGM website with email notifying of publication on website (for those documents requiring posting as per EA conditions) • Environmental Advisory Sub-Committees • Environmental Technician to communicate to community 	Within 48 hours of publication on the website.
Reportable Spill (refer to Spills Contingency and Response Plan for definition)	<ul style="list-style-type: none"> • MECP Spills Action Center • AFN, AZA, GFN, LLFN, MNO, RSMIN 	<ul style="list-style-type: none"> • Phone call and/or email letter to MECP • Environmental Technician to communicate to community 	<ul style="list-style-type: none"> • MECP Spills Action Center to be notified immediately. • Indigenous communities to be notified within 24 hours of reportable spill.
An exceedance of a MECP air quality criteria	<ul style="list-style-type: none"> • MECP Spills Action Center • AFN, AZA, GFN, LLFN, MNO, RSMIN 	<ul style="list-style-type: none"> • Email • Environmental Technician to communicate to community 	As soon as practicable.
Notification of Accident or Malfunction that may result in adverse environmental effects including: <ul style="list-style-type: none"> • date of accident or malfunction • summary description of accident or malfunction • list of any substances potentially released into the environment as a result of the accident or malfunction 	<ul style="list-style-type: none"> • IAA • MECP • AFN, AZA, GFN, LLFN, MNO, RSMIN • Municipality of Greenstone • Other relevant authorities as required 	<ul style="list-style-type: none"> • Email • Environmental Technician to communicate to community and offer Indigenous community members opportunities to assist in the response to the accident 	No later than 24 hours following the accident or malfunction.
Reports related to accidents and malfunctions that may result in adverse environmental effects	<ul style="list-style-type: none"> • IAA • MECP • AFN, AZA, GFN, LLFN, MNO, RSMIN • Municipality of Greenstone 	GGM website with email notifying of publication on website	Within 48 hours of publication on the website.



Item to be Communicated	Who will be Notified	Method(s) of Communication	Approximate Timing of Communication
	<ul style="list-style-type: none"> Other relevant authorities as required 		
Schedule for fulfilling all conditions in the Federal EA Decision Statement	<ul style="list-style-type: none"> IAA AFN, AZA, GFN, LLFN, MNO, RSMIN 	<ul style="list-style-type: none"> Email and/or letter GGM website with email notifying of publication on website Environmental Advisory Sub-Committee 	<ul style="list-style-type: none"> No later than 60 days prior to the start of construction. Notification within 48 hours of publication on the website.
Schedule outlining all activities required to carry out all phases of the Project	<ul style="list-style-type: none"> IAA AFN, AZA, GFN, LLFN, MNO, RSMIN 	<ul style="list-style-type: none"> Email and/or letter GGM website with email notifying of publication on website Environmental Advisory Sub-Committee 	<ul style="list-style-type: none"> No later than 60 days prior to the start of construction. Notification 48 hours of publication on the website.
Updates to schedules	<ul style="list-style-type: none"> IAA AFN, AZA, GFN, LLFN, MNO, RSMIN 	<ul style="list-style-type: none"> Email and/or letter GGM website with email notifying of publication on website Environmental Advisory Sub-Committee 	<ul style="list-style-type: none"> No later than December 31 annually. Notification within 48 hours of publication on the website.
Project updates, issues and concerns	<ul style="list-style-type: none"> Affected tenure holders 	Meetings	Semi-annually
Formal environmental complaint (refer to Feedback Protocol for further detail)	<ul style="list-style-type: none"> MECP District Manager 	Email	Within 2 business days of receiving a formal environmental complaint.
Update on construction decision, start of construction, start of operation, and start of closure	<ul style="list-style-type: none"> MECP MNRF ENDM IAA All identified Indigenous communities Municipality of Greenstone 	Email and/or meetings	As required

7 Feedback Protocol

The purpose of the Feedback Protocol (HP-GGM-CR-003-0049) is to outline the process (identification, tracking and mitigation measures) to manage complaints/grievances from local stakeholders and Indigenous communities, in the vicinity of Greenstone Mine activities, in a systematic and transparent manner with the aim of promoting mutual confidence and trust with our local stakeholders, and resolving issues in a timely manner.

Updates to the Feedback Protocol will be made as Greenstone Mine progresses and will be updated annually to reflect the relevant development status, priorities, and goals. The feedback response process provides an avenue for stakeholders to voice their concerns and gives transparency on how complaints will be managed by Greenstone Mine. Stakeholders can utilize the availability of the Community Relations staff at the Community Relations office to vocalize any complaints or the site phone number. Stakeholders are also welcomed to submit any questions or concerns via the Feedback page on the website.

8 Record Keeping and Reporting

Greenstone Mine will maintain and retain all records required to demonstrate compliance with the conditions listed in the federal Decision Statement at Greenstone Mine's head office and make them available to the IAA throughout construction and operation and for 25 years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first.

The provincial EA Annual Compliance Report will include a summary of environmental feedback and inquiries received and how they were addressed or responded to. This will be reviewed with the Environmental Advisory Sub-Committees. Greenstone Mine will retain either on the Site or in another location approved by the Director of the MECP a copy of each Annual Compliance Report that has been submitted to the MECP until such time as the Director determines that the Proponent is no longer required to do so. The Director shall notify Greenstone Mine in writing should the Director determine that Greenstone Mine is no longer required to retain copies of the Annual Compliance Reports that have been submitted.