Valentine Gold Project: Annual Report for the Federal Environmental Assessment – 2023 Reporting Period

Marathon Gold Corporation
36 Lombard Street
Suite 600
Toronto, ON M5C 2X3

March 2024

Version No.	Revised By	Date Issued
0.0		
Impact Assessment Agency of Canada Registry Reference Number: 80169		

Table of Contents

LIST OF TABLES

LIST OF FIGURES

LIST OF APPENDICES

Abbreviations

AAQFMP	Ambient Air Quality Follow-up Monitoring Program
AFMP	Avifauna Follow-up Monitoring Program
AMPRP	Accidents and Malfunctions Prevention and Response Plan
ARD	Acid Rock Drainage
ARD/MLMP	Acid Rock Drainage and Metal Leaching Management Plan
ARU	Autonomous Recording Units
BACT	Best Available Control Technology
CCME	Canadian Council of Ministers of the Environment
CEAA	Canadian Environmental Assessment Act
CFFMP	Country Foods Follow-up Monitoring Program
COSEWIC	Committee on the Status of Endangered Wildlife in Canada
CPEEMP	Caribou Protection and Environmental Effects Monitoring Plan
CWQG	Canadian Water Quality Guidelines
CWS	Canadian Wildlife Services
DFO	Fisheries and Oceans Canada
EA	Environmental Assessment
ECCC	Environment and Climate Change Canada
EEM	Environmental Effects Monitoring
EIS	Environmental Impact Statement
ENGO	Environmental Non-governmental Organizations
EP4	Equator Principles
EPA	Environmental Protection Act
EPP	Environmental Protection Plan
ERMA	Environment Resources Management Association
ERP	Emergency Response Plan
ESC	Erosion and Sediment Control
ESMS	Environmental and Social Management System
ESSR	Environment, Sustainability and Social Responsibility

FFHFMP	Fish and Fish Habitat Follow-up Monitoring Program
FRP	Fish Rescue Plan
GHG	Greenhouse Gas
GHGEFMP	Greenhouse Gas Emissions Follow-up Monitoring Program
GWFMP	Groundwater Follow-up Monitoring Program
HADD	Harmful Alteration, Disruption or Destruction
HGO	High Grade Ore
HHERA	Human Health and Ecological Risk Assessment
IAAC	Impact Assessment Agency of Canada
ICMI	International Cyanide Management Institute
IR	Information Requirements
ITRB	Independent Tailings Review Board
km	Kilometre
LGO	Low Grade Ore
LOM	Life of Mine
MAC	Mining Association of Canada
MDMER	Metal and Diamond Mining Effluent Regulations
MFN	Miawpukek First Nation
mg/l	Milligrams per litre
ML	Metal Leaching
ml	millilitre
MOU	Memorandum of Understanding
NFMP	Noise Follow-up Monitoring Program
NGO	Non-Governmental Organization
NL	Newfoundland and Labrador
NLDECC	Newfoundland and Labrador Department of Environment and Climate Change
NLDFFA	Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture
NL DIET	Newfoundland and Labrador Department of Industry, Energy and Technology
NLOA	Newfoundland and Labrador Outfitters Association

OEEMP	Outfitters Environmental Effects Monitoring Plan
OWFMP	Other Wildlife Follow-up Monitoring Program
PAG	Potentially Acid Generating
PEL	Probable Effects Limit
PM	Particulate Matter
QFN	Qalipu Mi'kmaq First Nation
RAA	Regional Assessment Area
RCP	Rehabilitation and Closure Plan
SAGR®	Submerged Attached Growth Reactor
SAR	Species at Risk
SEA	Socio-Economic Agreement
SEM	Sikumiut Environmental Management Ltd.
SOCC	Species of Conservation Concern
SWFMP	Surface Water Follow-up Monitoring Program
TMF	Tailings Management Facility
tpd	Tonnes per day
TMP	Traffic Management Plan
TSM	Towards Sustainable Mining
TSS	Total Suspended Solids
WMP	Water Management Plan
WRMD	Water Resources Management Division
ZOI	Zone of Influence

Executive Summary – English

Marathon Gold Corporation (Marathon) commenced construction of the Valentine Gold Project (the Designated / Approved Project) in October 2022, following the issuance of the environmental assessment (EA) Decision Statement by the federal Minister of Environment and Climate Change Canada (ECCC) on August 23, 2022, and release from the provincial EA process on March 17, 2022. The Approved Project consists of two open pits associated with the Leprechaun and Marathon gold deposits in the Central Region of Newfoundland and Labrador (NL). The Project is in a rural region, with the nearest communities of Millertown and Buchans located approximately 49 km and 60 km straight-line distance from the mine site, respectively.

As per the federal and provincial EA process and requirements, Marathon submitted an Environmental Impact Statement (EIS), which assessed the potential Project-related environmental and social impacts, to the Impact Assessment Agency of Canada (IAAC) and the Newfoundland and Labrador Department of Environment and Climate Change (NLDECC) in September 2020, for regulatory review and approval.

Following the EA process, Marathon's Environment, Sustainability and Social Responsibility (ESSR) Team focused on regulatory consultation (for permits, approvals, and authorizations) and engagement with stakeholders, Qalipu Mi'kmaq First Nation (QFN), and Miawpukek First Nation (MFN). The engagement process was guided by Marathon's engagement strategy, developed to ensure that those whose interests may be affected by the Project are appropriately informed and meaningfully engaged regarding the company's ongoing and planned activities.

Through engagement with QFN and MFN, and consultation with regulatory agencies (e.g., Fisheries and Oceans Canada, ECCC), environmental management plans and follow-up monitoring programs, designed to guide implementation of Project compliance requirements and commitments, were developed and finalized. The associated plans and programs have been and continue to be implemented as appropriate, based on the Project schedule, and reviewed and updated as per the review cycles described in the individual follow-up monitoring plans.

During detailed engineering, post-EA release, the use of a fibre optic cable for communications was deemed unfeasible and a communications tower was selected as the preferred site communications option. Following regulatory consultation, Indigenous engagement, and submission of a Project update on this proposed change in January 2023, Marathon was informed by NLDECC – EA Division in February 2023, that the proposed communications tower would not require assessment under the *Environmental Protection Act*. In May 2023, IAAC issued an amended Decision Statement that added the communications tower to the definition of the Designated Project (Condition 1.8), such that all relevant Conditions also apply to this additional Project component and associated activities.

Based on further exploration, Marathon proposed a second change to the Designated Project – the Berry Pit Expansion (the Project Expansion) – which includes development of a third open pit (Berry pit) on the site and other associated changes. On August 13, 2023, Marathon submitted the Berry Pit Expansion

Environmental Registration / Environmental Assessment (Valentine Gold Project) Update to NLDECC and IAAC to satisfy requirements under the provincial Environmental Assessment Regulations and proposed changes to the Designated Project, respectively, as well as to MFN and QFN. Following regulatory review and a 30-day public comment period, the provincial Minister of Environment and Climate Change released the Project Expansion from the EA process, subject to conditions of release, on October 27, 2023. IAAC issued a draft Analysis Report and draft Decision Statement for a 30-day public comment period (February 16 to March 18, 2024), following which IAAC will consider the comments received in finalizing their Analysis Report and in revising, if applicable, the Decision Statement for the Minister's consideration.

This report describes activities undertaken by Marathon to comply with each of the Conditions set out in the Decision Statement during the reporting period of January 1 through December 31, 2023, to fulfill annual reporting requirements as outlined under Condition 2.10 of the Decision Statement.

It should be noted that pursuant to Condition 2.15, Marathon advised IAAC (on February 14, 2024) that Calibre Mining Corporation (Calibre) and Marathon Gold Corporation (Marathon) had announced the completion (on January 24, 2024) of the transaction in which Calibre acquired Marathon and the Valentine Gold Project. As Marathon was the owner of the Designated Project during the reporting period, 'Marathon' is used for all company references within this report.

Executive Summary – French

Marathon Gold Corporation (Marathon) a commencé la construction du projet aurifère de Valentine (le projet désigné/approuvé) en octobre 2022, à la suite de la publication de l'énoncé de décision concernant l'évaluation environnementale (EE) par le ministre fédéral de l'Environnement et du Changement climatique (ECCC) le 23 août 2022, et de l'abandon du processus d'EE provincial le 17 mars 2022. Le projet approuvé consiste en deux mines à ciel ouvert associées aux gisements aurifères de Leprechaun et de Marathon dans la région centrale de Terre-Neuve-et-Labrador (T.-N.-L.). Le projet est situé dans une région rurale, les communautés les plus proches de Millertown et de Buchans se trouvant respectivement à environ 49 km et 60 km en ligne droite du site minier.

Conformément aux exigences et aux processus fédéraux et provinciaux en matière d'EE, Marathon a présenté un énoncé des incidences environnementales (EIE), qui évalue les incidences environnementales et sociales potentielles liées au projet, à l'Agence d'évaluation d'impact du Canada (AEIC) et au ministère de l'Environnement et du Changement climatique de Terre-Neuve-et-Labrador (MECCTNL) en septembre 2020, à des fins d'examen et d'approbation réglementaires.

À la suite du processus d'EE, l'équipe Environnement, durabilité et responsabilité sociale (EDRS) s'est concentrée sur les consultations réglementaires (pour les permis, les approbations et les autorisations) et la mobilisation des intervenants, la Première Nation micmaque de Qalipu (PNQ) et la Première Nation de Miawpukek (PNM). Le processus de mobilisation a été guidé par la stratégie de mobilisation de Marathon, élaborée pour garantir que les personnes dont les intérêts peuvent être affectés par le projet sont informées adéquatement et mobilisées valablement en ce qui concerne les activités en cours et prévues de la société.

Grâce à la mobilisation de la PNQ et de la PNM, et à la consultation des organismes de réglementation (p. ex., Pêches et Océans Canada, ECCC), la société a pu élaborer et finaliser des plans de gestion environnementale et des programmes de surveillance subséquente, conçus pour orienter la mise en œuvre des exigences de conformité et des engagements du projet. Les plans et les programmes associés ont été et continuent d'être mis en œuvre comme il se doit, en fonction du calendrier du projet, et examinés et mis à jour selon les cycles d'examen décrits dans les plans de surveillance subséquente individuels.

Durant l'étude technique détaillée, après la publication de l'EE, l'utilisation d'un câble à fibre optique pour les communications a été jugée irréalisable et une tour de communication a été retenue comme l'option de communication de premier choix pour le site. À la suite des consultations réglementaires, de la mobilisation des Autochtones et de la présentation d'une mise à jour du projet sur le changement proposé en janvier 2023, Marathon a été informée par la Division d'EE du MECCTNL en février 2023 que la tour de communication proposée ne nécessiterait pas d'évaluation en vertu de la *Loi sur la protection de l'environnement*. En mai 2023, l'AEIC a publié un énoncé de décision modifié dans lequel la tour de communication a été ajoutée à la définition du projet désigné (condition 1.8), de sorte que toutes les

conditions pertinentes s'appliquent aussi à cette composante supplémentaire du projet et aux activités associées.

Sur la base d'une exploration plus poussée, Marathon a proposé un deuxième changement au projet désigné – l'expansion de la mine Berry (le projet d'expansion) – qui comprend le développement d'une troisième mine à ciel ouvert (mine de Berry) sur le site et d'autres changements connexes. Le 13 août 2023, Marathon a présenté la mise à jour de l'enregistrement environnemental/évaluation environnementale pour l'expansion de la mine de Berry (projet aurifère de Valentine) au MECCTNL et à l'AEIC pour satisfaire aux exigences du règlement provincial sur l'évaluation environnementale et les changements proposés au projet désigné, respectivement, ainsi qu'à la PNM et à la PNQ. À la suite de l'examen réglementaire et d'une période de consultation publique de 30 jours, le ministre provincial de l'Environnement et du Changement climatique a renoncé à l'EE du projet d'expansion, sous réserve de certaines conditions, le 27 octobre 2023. L'AEIC a publié un rapport d'analyse provisoire et une déclaration de décision provisoire pour une période de consultation publique de 30 jours (du 16 février au 28 mars 2024), à l'issue de laquelle l'AEIC examinera les commentaires reçus afin de finaliser son rapport d'analyse et de réviser, le cas échéant, la déclaration de décision pour la soumettre à l'examen du ministre.

Le présent rapport décrit les activités effectuées par Marathon pour se conformer à chacune des conditions énoncées dans la déclaration de décision au cours de la période de rapport allant du 1er janvier au 31 décembre 2023, afin de satisfaire aux exigences de rapport annuel prévues à la condition 2.10 de la déclaration de décision.

Il convient de noter que, conformément à la condition 2.15, Marathon a informé l'AEIC (le 14 février 2024) que la Calibre Mining Corporation (Calibre) et Marathon Gold Corporation (Marathon) ont annoncé la finalisation (le 24 janvier 2024) d'une transaction par laquelle Calibre a fait l'acquisition de Marathon et du projet aurifère de Valentine. Comme Marathon était propriétaire du projet désigné pendant la période de rapport, « Marathon » est utilisé pour toutes les références à la société dans le présent rapport.

1.0 INTRODUCTION

Marathon Gold Corporation (Marathon) is developing an open pit gold mine near Valentine Lake in central Newfoundland (Figure 1-1). The main components of the Valentine Gold Project (the Project) include two open pits, waste rock piles, crushing and stockpiling areas, conventional milling and processing facilities (the process plant), a tailings management facility (TMF), personnel accommodations, and supporting infrastructure including roads, explosives storage facility, on-site power lines, buildings, and water and effluent management facilities. The mine site will encompass an approximate footprint of 2,130 ha (not including the existing access road).

The Project is located in a rural region, with a history of mining exploration and development activities and other land and resource uses, including commercial forestry, hydroelectric developments, outfitting, and recreational land use. The mine site is accessed by an existing public access, gravel road that extends approximately 88 kilometres (km) south from Millertown to Marathon's existing exploration camp. Marathon is upgrading and maintaining the access road from a turnoff approximately 8 km southwest of Millertown to the mine site (i.e., a distance of approximately 76 km).

Marathon commenced construction of the Valentine Gold Project (the Designated / Approved Project) in October 2022. Construction of the Project is expected to take place over a period of approximately 2 years, with an estimated life of mine (LOM) of 17 years, including construction and closure. Upon cessation of mining, the operation will be closed, and the site components will be rehabilitated and monitored in accordance with applicable regulations at the time of closure.

An Environmental Assessment (EA) was completed for the Project under the *Canadian Environmental Assessment Act, 2012* (*CEAA* 2012) and the Newfoundland and Labrador *Environmental Protection Act* (*EPA* 2002). In 2020, Marathon submitted an Environmental Impact Statement (EIS) for the Project to the Impact Assessment Agency of Canada (IAAC) and to the Environmental Assessment Division of the Newfoundland and Labrador Department of Environment and Climate Change (NLDECC). The Designated Project was released from the provincial EA process on March 17, 2022 (NLDECC, 2022), and the Federal Minister of Environment and Climate Change Canada (ECCC) issued the final Decision Statement, including the EA Conditions, on August 23, 2022.

This report has been prepared to fulfill the annual reporting requirements as outlined under Condition 2.10 of the Decision Statement issued by the Federal Minister of ECCC, and describes activities undertaken by Marathon to comply with each of the conditions in the Decision Statement during the 2023 reporting period (January 1 to December 31, 2023).

1.1 CHANGES TO THE DESIGNATED PROJECT

Subsequent to EA release, the use of a fibre optic cable for site communications was deemed unfeasible during the detailed engineer design and discussions with the fibre optic cable provider. Alternative options were then explored, and the Communications Point-to-Point connection (communications tower) was chosen as the preferred option. EA Condition 2.16 requires that Marathon notify IAAC in advance of

carrying out any proposed changes to the Project as defined in Condition 1.8, and stipulates the information requirements, including results of consultation with Indigenous groups on the proposed changes.

Marathon initiated Indigenous engagement and regulatory consultation, and a Project update including the proposed change (construction, operation and decommissioning of a communications tower) was submitted in January 2023, to Indigenous groups, IAAC and NLDECC, the communities, the Newfoundland and Labrador Outfitters Association (NLOA), and salmonid associations. In February 2023, the EA Division of NLDECC informed Marathon that the proposed addition of the communications tower to the Valentine Gold Project would not require assessment under the *Environmental Protection Act.* In May 2023, IAAC issued an amended Decision Statement, adding the communications tower to the definition of the Designated Project (Condition 1.8), such that all relevant Conditions also apply to this additional Project component.

Marathon has proposed a second change to the Designated Project – the Berry Pit Expansion (the Project Expansion) – which includes development of a third open pit (Berry pit) on the site. On August 13, 2023, Marathon submitted the Berry Pit Expansion Environmental Registration / Environmental Assessment (Valentine Gold Project) Update to NLDECC and IAAC to satisfy requirements under the provincial Environmental Assessment Regulations and proposed changes to the Designated Project, respectively, as well as to MFN and QFN. Following regulatory review and a 30-day public comment period, the provincial Minister of Environment and Climate Change released the Project Expansion from the EA process, subject to conditions of release, on October 27, 2023. IAAC issued a draft Analysis Report and draft Decision Statement for a 30-day public comment period (February 16 to March 18, 2024), following which IAAC will consider the comments received in finalizing their Analysis Report and in revising, if applicable, the Decision Statement for the Minister's consideration. As consultation and engagement on the Project Expansion is ongoing, results of these efforts will be included in the annual report for the 2024 reporting period.

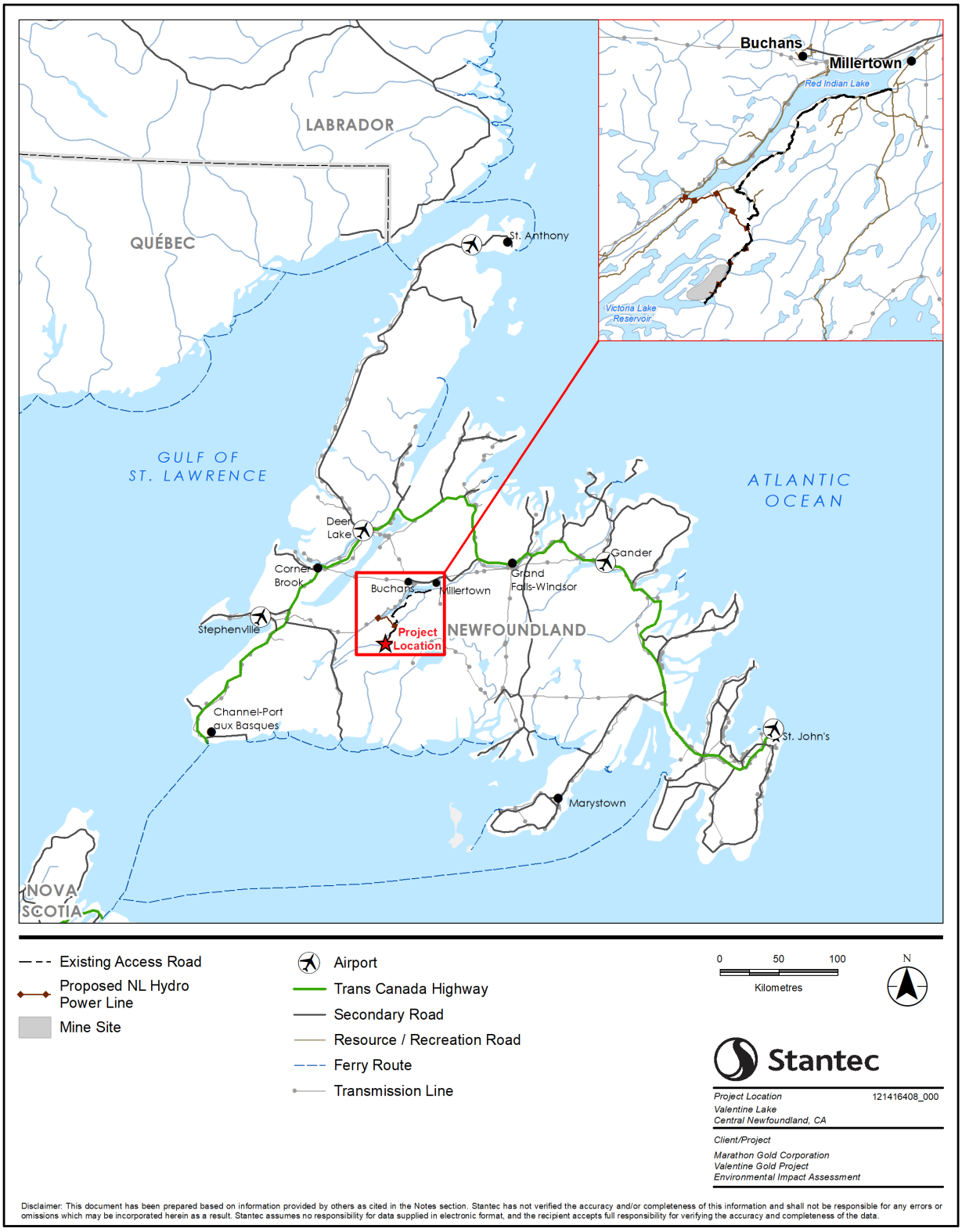


Figure 1-1 Project Location

2.0 REPORT SCOPE AND REQUIREMENTS

The scope of this *Valentine Gold Project: Annual Report for the Federal Environmental Assessment: 2023 Reporting Period* (Annual Report) is to provide details on how Marathon complied with Conditions of the Decision Statement issued under Section 54 of CEAA, 2012. This report covers the Project activities undertaken by Marathon during the period from January 1, 2023, through December 31, 2023 (herein referred to as the "reporting period").

Pursuant to Condition 2.15, Marathon advised IAAC (on February 14, 2024) that Calibre Mining Corporation (Calibre) and Marathon Gold Corporation (Marathon) had announced the completion (on January 24, 2024) of the transaction in which Calibre acquired Marathon and the Valentine Gold Project. As Marathon was the owner of the Designated Project during the reporting period, 'Marathon' is used for all company references within this report.

Condition 2.10 of the Decision Statement outlines the Annual Report information requirements for the Project. Table 2-1 outlines the section references within this document that demonstrate concordance with these requirements.

Table 2-1 Annual Report Information Requirements and Marathon Concordance

Condition	Location of Information
2.10: The Proponent shall prepare an annual report that sets out, for each reporting year:	
2.10.1: the activities undertaken by the Proponent to comply with each of the Conditions set out in this Decision Statement;	Appendix A presents a list of all the Decision Statement Conditions and either describes the activities taken by Marathon in the reporting period to comply with each Condition or references the applicable section of this report where the information is located.
2.10.2: how the Proponent complied with Condition 2.1;	In addition to Appendix A, further information is provided in Section 4 (Approach to Compliance Management).
2.10.3: for Conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent	In addition to Appendix A, further information is provided in Section 5 (Consultation and Engagement) and Appendix B (Indigenous Engagement Summary).

Condition	Location of Information
received during or as a result of the consultation;	
2.10.4: the information referred to in Conditions 2.5 for each follow-up program and any update to that information made pursuant to Condition 2.6;	In addition to Appendix A, further information is provided in Section 6 (Follow-Up Programs) and Appendix B.
2.10.5: the results of the follow-up program requirements identified in Conditions 3.17, 3.18, 4.8, 4.9 and 6.1;	In addition to Appendix A, further information is provided in Section 6 (Follow-Up Programs).
2.10.6: for any plan that is a requirement of a Condition set out in this Decision Statement, any update(s) to the plan that have been made during the reporting year; and	In addition to Appendix A, further information is provided in Section 7 (Plans).
2.10.7: any modified or additional mitigation measure implemented or proposed to be implemented by the Proponent, as determined pursuant to Condition 2.8.	In addition to Appendix A, further information is provided in Section 6 (Follow-Up Programs).

3.0 PROJECT UPDATE

This section provides a brief overview of various activities related to the Project that took place during the reporting period.

3.1 ENVIRONMENTAL REGULATORY APPROVALS

As noted in Section 1.0, the EA Federal Decision Statement was issued by the Federal Minister of ECCC on August 23, 2022, and Marathon announced the Board of Directors' decision to proceed with Project construction on September 1, 2022. As described in detail in Section 1.1, it was subsequently determined that fibre optic cable was not feasible for communications, and that a communications tower was necessary. Following consultation with regulators and Indigenous groups and notification to stakeholders, IAAC amended the Decision Statement in May 2023 to incorporate the communications tower in the definition of the Designated Project (Condition 1.8), to which the Decision Statement conditions apply. The EA Division of NLDECC informed Marathon (in February 2023) that the proposed addition of the communications tower to the Valentine Gold Project would not require assessment under the *Environmental Protection Act*.

A further change to the Designated Project was presented in the December 2022 Update Feasibility Study, whereby Marathon proposed to develop a third open pit within the Valentine Gold Project mine site. The Berry Pit Expansion (the Project Expansion) required notification to IAAC as per Conditions 2.16 and 2.17, and was considered a new undertaking under the provincial EA process. A single document – the Berry Pit Expansion Environmental Registration / EA (Valentine Gold Project) Update – was developed to satisfy the requirements under both EA regimes.

The following federal regulatory approvals / authorizations were issued during the reporting period:

- Amendments to the Letter of Advice for Repairs, Upgrades, and Placement of Culverts and Bridges along the Access and Haul Roads (Fisheries and Oceans Canada [DFO]).
- Approval Letters from NAV CANADA and Transport Canada associated with the construction of a Communications Tower.

Key provincial regulatory approvals / permits obtained during the reporting period include the following:

- Release from provincial EA process for the Berry Pit Expansion Project (NLDECC – Environmental Assessment Division).
- Approval of the Life of Mine Development Plan (Newfoundland and Labrador Department of Industry, Energy and Technology [NL DIET]).
- Approval of the Rehabilitation and Closure Plan (NL DIET).

- Permit to Alter a Body of Water associated with the TMF Dam construction, Sedimentation Pond construction, Process Plant stream and wetland infilling, and Access Road Bridge routine maintenance (NLDECC – Water Resources Management Division (WRMD)).
- Water Use License for Water Withdrawal and Use from unknown waterbody for Industrial Purposes associated with the Concrete Batch Plant (NLDECC – WRMD).
- Quarry Permits at two locations along the access road for borrow source material associated with upgrades and maintenance (NLDECC – WRMD).
- Building Accessibility and National Building Code Review approvals for the Accommodation Complex and Coarse Ore Storage.

3.2 CONSTRUCTION

The updated construction schedule is provided in Appendix C. Construction activities for the Project began in October 2022, and construction continued throughout 2023 including:

- Installation of water intake infrastructure at Victoria Reservoir.
- Completion of the permanent accommodations camp.
- Tree clearing and grubbing of organic material at various locations across the Project site (e.g., TMF, waste rock stockpiles, permanent sedimentation ponds, haul roads, process plant area, etc.).
- Continuation of haul road construction to Marathon pit and associated stockpiles.
- Stripping and grubbing of organics, and topsoil and overburden removal the Leprechaun and Marathon pits to permit development (blast/load/haul) of construction rock for earthworks.
- Site access road upgrades, principally between the Victoria River Bridge and the Project site, including minor road realignments, ditching, and culvert installation and replacement.
- Development of the rock pads for the process plant, mine maintenance facility and portions of both the High Grade Ore Stockpile and the Leprechaun Low Grade Ore Stockpile (temporary batch plant location).
- Rock placement and partial construction of the TMF Dam.
- Partial completion of the process plant and associated components (e.g., Mechanically Stabilized Earth Wall and Run of Mine).

All construction activities included construction water management and environmental monitoring, where appropriate. In 2023, NL Hydro completed construction of the Project's 40 km long 66 kV powerline between the Star Lake generating station and the Plant Site substation. This work was managed by NL Hydro and completed by their contractors under a separate EA and subsequent permit approvals.

4.0 APPROACH TO COMPLIANCE

The careful and precautionary approach Marathon employed for the EA and project planning and design phases has been carried into the construction phase and will continue throughout all phases and aspects of the Project. The same diligence is being employed to maintain compliance with regulatory requirements and commitments. This section outlines this approach to continued fulfillment of Condition 2.1:

> *The Proponent shall ensure that its actions in meeting the Conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge including community and Indigenous knowledge, available at the time the Proponent takes action, are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies.*

4.1 STRUCTURE

To manage compliance with regulatory requirements and conditions of approval, and conformance with additional internal and external commitments, Marathon has developed a Project Commitment Register, which forms the basis for Marathon's Environmental and Social Management System (ESMS). Using a structured approach, actions are identified to address each of the commitments and regulatory requirements, and these are incorporated into management plans or programs for implementation and monitoring. An annual check is conducted to determine if the components of the ESMS (e.g., policies, plans, procedures, and resources) have sufficiently facilitated compliance / conformance. Deficiencies or opportunities for improvement are addressed in support of continual improvement. An annual internal documentation review and audit was completed in 2023, and opportunities for improvement have been identified for implementation in 2024. In addition, regulatory software (Nimonik) was selected for the development of a project specific regulatory database that will be implemented in 2024.

4.2 TEAM

Marathon employs a team of qualified individuals, supported by industry-leading leading consultants and subject matter experts from companies such as Stantec Consulting Ltd. (Stantec), Gemtec Consulting Engineers and Scientists Limited (Gemtec), WSP, Sikumiut Environmental Management Ltd. (SEM), Ausenco Ltd. (Ausenco), SNC Lavalin and others, to develop mitigation measures and management plans, to design and implement the various follow-up and monitoring programs, and to undertake the detailed Project design. Field programs, studies, and engineering designs follow accepted and applicable standards and practices using recognized methods and models, which will lead to the construction and operation of a mine that complies with regulatory requirements and mitigates potential environmental effects. For Project construction, requirements outlined in the Conditions are incorporated into contract specifications and drawings for implementation by the applicable contractors, who are managed by

Marathon and/or Marathon representatives and monitored for compliance. This diligent approach will continue throughout all Project phases.

4.3 ENGAGEMENT AND CONSULTATION

As required by the Conditions and consistent with its approach to Indigenous and stakeholder engagement, Marathon has consulted, and will continue to consult, with relevant authorities and engage with Indigenous groups, stakeholders, communities, fish and wildlife associations, other affected parties and the public to solicit input and to identify issues and concerns. The information and knowledge gathered through engagement and consultation is considered and incorporated as applicable into the various measures, plans and programs required by the Conditions. Marathon's adaptive management approach facilitates the identification and implementation of changes that may be required, based on ongoing consultation and engagement (in tandem with monitoring), to reduce adverse effects of the Project and support continuous improvement.

4.4 INDUSTRY STANDARDS

Marathon became a member of the Mining Association of Canada (MAC) in 2021 and is currently working to meet the requirements of MAC's Towards Sustainable Mining (TSM) initiative in advance of implementation in 2025. Established in 2004, TSM is a globally recognized program that has been developed to manage environmental and social risks associated with mining. TSM is framed around MAC performance assessments and a MAC letter-grade system ranging from C (no systems in place) to AAA (excellence and leadership is demonstrated and validated by external, independent assessments). The grades indicate performance within areas of sustainability, including Biodiversity Conservation Management, Climate Change, Indigenous and Community Relationships, Tailings Management, Water Stewardship, and Mine Closure Framework, among others.

Marathon became a signatory to the International Cyanide Management Institute's (ICMI) Cyanide Code on September 9, 2021, and is in the process of becoming certified. As cyanide will be used to process the gold, Marathon intends to implement the ICMI Principle and the associated Standards of Practice within each Principle.

Marathon's ESMS and Climate Change Impacts Assessment meet requirements of the Equator Principles (EP4) risk management structure. In accordance with EP4 requirements (for Projects classed as Category A), Marathon has developed and implemented an ESMS. In 2023, an ESMS internal conformity assessment and a documentation review were completed. The Internal assessment focused on the environment aspects of the management system and included a review of regulatory permits, conditions of the Project approval, the Environmental Protection Plan - Construction, four embedded management plans, and four associated monitoring programs. There were nine opportunities for improvement identified that will be implemented in 2024. The internal documentation review included all environmental management plans and monitoring programs. In accordance with the adaptive management process, the document review comments are assessed and implemented, as appropriate.

The planning and design for the tailings management facility has been completed by an expert third party and independently peer-reviewed by an Independent Tailings Review Board (ITRB). Marathon is committed to following the Canadian Dam Association's Dam Safety Guidelines and the Mining Association of Canada's Guide to the Management of Tailings Facilities over the life of the Project. Construction of the TMF is ongoing under the guidance of WSP, the Engineer of Record, who has completed monitoring and inspections throughout the year. In addition, the ITRB completed several reports and an inspection of the TMF in 2023.

4.5 TECHNOLOGY

In 2023, Marathon reassessed the planned treatment system for the process effluent. The Approved Project design included a polishing pond as a component of the tailings management facility (TMF) used to treat excess process water and TMF effluent.. As part of the Project Expansion, Marathon proposes to replace the polishing pond with a submerged attached growth reactor unit (SAGR®), as the last stage of treatment prior to discharge into the environment.

SAGR® is a newer technology that is smaller, can operate in colder temperatures, and can more effectively remove nitrogen species, thereby expediting treatment and shortening retention time. As an overview, free cyanide (if remaining in solution after treatment through the mill's cyanide destruction circuit and natural degradation within the TMF), suspended solids and metals are reduced to non-toxic levels through a process (water treatment plant) consisting of chemical treatment for cyanide destruction and metals precipitation, followed by cloth disk filtration to remove the precipitated metals and other suspended solids from the influent prior to treatment via the SAGR®. The suspended solids concentration into the SAGR® is expected to be <5 mg/l on average and no more than 25 mg/l. The compounds entering the SAGR® are primarily bioavailable nitrogen species such as thiocyanate, cyanate and ammonia. Biomass in the SAGR® oxidizes these compounds and reduces overall ammonia to non-toxic levels. Excess biomass created as a byproduct of ammonia detoxification in the SAGR® is aerobically digested within the SAGR®. SAGR® discharge is therefore low in suspended solids, metals, thiocyanate, cyanate, ammonia, and bacteria.

5.0 CONSULTATION AND ENGAGEMENT

The Decision Statement includes multiple Conditions for which consultation and engagement is a requirement. A summary of these is presented in Table 5-1. Where consultation and engagement are required, Conditions 2.3 and 2.4 stipulate the minimum components of the process which must be followed. This section provides a summary of Marathon's approach to consultation and engagement with emphasis upon the key activities undertaken with Indigenous groups during the reporting period as required by the relevant Decision Statement Conditions.

Table 5-1 Summary of Conditions Containing Consultation and Engagement Requirements

Topic	Conditions
General Conditions	2.1, 2.4, 2.16, 2.17
Fish and Fish Habitat	3.17
Acid Rock Drainage and Metal Leaching	3.15, 3.18
Migratory Birds	4.8
Health of Indigenous Peoples	6.1
Current Use of Lands and Resources for Traditional Purposes and Socio-economic Conditions	7.1, 7.2
Cultural Awareness Training	7.3
Physical and Cultural Heritage and Structure, Site or Thing of Historical, Archaeological, Paleontological or Architectural Significance	8.1, 8.2
Accidents and Malfunctions	10.2, 10.3, 10.4, 10.6

5.1 OVERVIEW

Consistent with its corporate values (Respect, Accountability, Transparency, Inclusion and Prosperity), Marathon is committed to ensuring that those whose interests may be affected by the Project, including Indigenous groups and stakeholders, are appropriately informed and meaningfully engaged regarding the company's ongoing and planned activities. Marathon's approach to engagement is set out in its

Indigenous Relations Policy and Community Relations Policy, and is also informed by the Human Rights Policy and Diversity Policy located in Appendix D.

Marathon has developed and implemented a stakeholder engagement strategy. The list of stakeholders has been developed through stakeholder mapping and is intended to capture the external individuals, groups and organizations that may be affected by the Project. The list is reviewed on an ongoing basis to ensure it is appropriate.

The principal external stakeholders respecting the environmental aspects of the Project are included below.

- Communities (six communities in reasonable proximity to the Project) including local government institutions, residents, local businesses, and schools.
- Fish and Wildlife Associations, including the Newfoundland and Labrador Outfitters Association (NLOA) and Salmonid Associations (Atlantic Salmon Federation, Environment Resources Management Association [ERMA], Salmonid Association of Eastern Newfoundland, Salmonid Council of Newfoundland).
- Civil Society Organizations, including ENGOs.
- Miawpukek First Nation (MFN) and Qalipu Mi'kmaq First Nation (QFN), including Chief and Council, executive staff, membership, and business development associations.

Marathon's approach to engagement with stakeholders has been developed, consistent with its core corporate values and is based upon the timely and transparent sharing of relevant Project-related information, ongoing opportunities for dialogue, identification and responsiveness to issues and concerns, and consideration of stakeholder input into project planning and design. The method and frequency of engagement adopted by Marathon depends upon the level, interest and influence of the specific stakeholder, consideration of stakeholder capacity, needs and interests, barriers to engagement, required resources to enable meaningful stakeholder participation and prior history with development.

Indigenous and stakeholder engagement activities are tracked using customized software (NetBenefit). Records of Indigenous and stakeholder interactions, including meetings, phone calls, emails, and other communications are maintained to ensure that issues and concerns are documented and that commitments are honored. Engagement activities are described in internal monthly reports and summarized in quarterly presentations to the Board of Directors. In addition, information respecting Indigenous and stakeholder engagement is a component of Marathon's publicly available annual Sustainability Report and the reports required by the NL Benefits Agreement concluded with the province in 2022. Indigenous and stakeholder engagement is monitored as part of the ESMS.

Consistent with Conditions 2.3 and 2.4, where consultation is required, it is undertaken by the following process. Marathon issues a written request in the form of email or correspondence to the relevant parties, containing a request to the party to provide its views and comments on the information Marathon provides

as part of the consultation request. All requests are documented and recorded in the Annual Report, pursuant to Condition 2.10. Marathon will continue to provide written notice respecting the opportunity for consultation to the party or parties as required by, and in accordance with, the timing (e.g., prior to operation start or Project change) specified in the condition(s) identifying the requirement for consultation.

In accordance with Conditions 2.3.3 and 2.3.4, where comments on information relevant to the conditions of approval have been received from a party being consulted, Marathon has undertaken an impartial review and consideration of this information. Where appropriate, information has incorporated the views and information submitted into the final versions of applicable Project processes, plans and programs. Comments provided by parties being consulted, and a description of how each comment has or has not been incorporated together with supporting rationale, are recorded and provided to each party who made the comment within a reasonable time. A record of consultation with the various parties, including the comments / information received, Marathon's response documenting how the views comments information has been considered, and the rationale for Marathon's response, are tracked and consolidated for inclusion in each annual report under Condition 2.10 for the year in which the comments are received (See Appendix B).

In 2023, engagement respecting changes to the Designated Project included the proposed addition of the Communications Tower and the proposed Berry Project Pit Expansion. As detailed in Section 1.1, the proposed addition of Communications Tower was approved in 2023 and the details of the engagement have been included in this report. The proposed changes associated Berry Project Pit Expansion are subject to the ongoing IAAC review process, and as such, these engagement activities have not been included in this report.The sections that follow provide details of engagement activities with stakeholders and Indigenous groups.

5.2 COMMUNITIES

Since Project registration in 2019, Marathon has worked diligently to ensure that local communities and resident stakeholders are informed of the Project and have the opportunity to identify issues and express concerns. The objectives of community engagement are to ensure consistent, timely and ongoing dialogue with communities in order reduce adverse effects of the Project and to maximize economic and social benefits for adjacent communities, provincial residents and businesses.

Focus has been placed on the six communities of interest located closest to the proposed Project site: the Towns of Buchans, Millertown, Badger, Grand-Falls Windsor and Bishop's Falls and the Local Service District of Buchans Junction.

Examples of key engagement activities with communities have included the following:

- Community Cooperation Agreements with the six communities of interest.
- Surveys and questionnaires to enable community residents and members of organizations to provide input and feedback following meetings and information sessions.

- Virtual and in-person public information sessions with local leadership and community residents to provide corporate and project updates, including information relating to the environmental assessment and permitting processes.
- Monthly meetings with local government leadership to provide updates and discuss issues of concern.
- Site visit by community representatives in November 2023.
- Marathon's representation on regional bodies such as the Central Health Community Advisory Committee and attendance at regional economic symposiums and conferences.
- Implementation of a Small Business Opportunities Expression of Interest Process to facilitate the development of local business capacity and enhance access to contracting opportunities.
- Regular and ongoing targeted advance notice of employment and contracting opportunities.
- Provision of annual community financial allotments to promote community capacity, support infrastructure improvements and fund events.
- Sponsorship of local recreational, cultural and community health and well-being initiatives.

As noted above, all engagement efforts are documented and issues and concerns raised by communities are considered in project planning and execution and through regular engagement activities.

Since the release of the Designated Project from the EA process in 2022 , Marathon has continued to engage with each community respecting the progress of the Project. In 2023, engagement efforts respecting changes to the Designated Project, including the proposed addition of the Communications Tower and the proposed Berry Project Pit Expansion (as described in Section 1.1), were undertaken.

On January 26, 2023, Marathon provided each community with an information summary respecting the proposed communications tower and inviting comments. The communications tower was also discussed at the monthly meetings of Mayors in Q1, 2023 and no issues were identified by communities.

Marathon will continue to engage with communities in order to provide Project-related information and to identify and respond to community issues and concerns.

5.3 FISH AND WILDLIFE ASSOCIATIONS / ENGOs

Fish and wildlife associations and environmental non-governmental organizations (ENGOs) which have a recreational, commercial, or environmental interest in natural resources in the Central Region of the province are stakeholders interested in or potentially affected by Marathon's operations. Marathon has engaged with a range of salmonid associations, the Newfoundland and Labrador Outfitters Association (NLOA), and a number of environmental non-governmental organizations beginning in 2019 and continuing to the present day. Engagement efforts and activities are commensurate with the interest and

influence of each group and are tailored to particular issues of concern. Such efforts include the regular provision of Project-related information, meetings (both in-person and virtual) to provide Project updates and discuss issues of particular relevance to the specific organization, and, where appropriate, incorporation of feedback into project planning, design and execution. For example, Marathon has met with representatives of salmonid associations as well as wildlife associations to provide input into the design of mitigation and monitoring measures relating to fish and fish habitat. In 2023, the Victoria River Outfitters were awarded the contract for Marathon's fish habitat offsetting work in the Victoria River Steady.

Marathon has also concluded an Outfitters Environmental Effects Monitoring Plan (OEEMP) agreement with the NLOA which provides for ongoing engagement between Marathon and NLOA with respect to the monitoring of the potential effect of the Project upon caribou and other big game as well as other relevant environmental components. The OEEMP also provides a mechanism for compensation for outfitters whose business activities have been directly affected by the Project. In 2023, one claim was made, which was resolved in favour of an outfitter adversely affected by the closure and replacement of the Victoria River Bridge along the access road to the Valentine Gold project site. Pursuant to the terms of the OEEMP, Marathon and NLOA have agreed to work cooperatively over the life of the Project to avoid or minimize adverse effects on outfitting activities. Marathon continues to provide the NLOA and, where appropriate, individual outfitters, with timely information respecting the progress of the Project, including notices of Project-related activity such as road closures, snow clearing or other access-related matters which potentially could affect outfitter activities in the area. Such information may also include information related to Marathon's environmental effects monitoring programs related to fish and wildlife, including caribou, which may impact outfitter activities. Information is provided through regular Project updates as well, and for the past two years, Marathon has delivered a presentation at the Annual General Meeting of the NLOA.

During 2023, Marathon engaged with Fish and Wildlife groups with respect to changes to the Designated Project. On January 26, 2023, Marathon provided the NLOA with a Briefing Note on the proposed communications tower together with an offer to meet to discuss. No issues were identified by the organization.

A similar approach was taken with respect to engagement with Salmonid Groups. On January 27, 2023, Salmonid groups were provided with a briefing note on the proposed Communications Tower together with an offer to meet to discuss. No issues were identified by the groups.

In addition to the engagement efforts described above, Marathon also provided other stakeholders, such as cabin owners, with information related to changes to the Project. Consistent with its commitment to ongoing engagement, Marathon will continue to engage with stakeholders over the life of the Project, to provide Project-related information, and to identify and address stakeholder issues and concerns.

5.4 INDIGENOUS GROUPS

As noted previously, the Decision Statement includes conditions related to Indigenous consultation and engagement. This section will provide an overview of Marathon's approach to Indigenous engagement and initiatives in relation to cultural awareness training, physical and cultural heritage, and structures, sites or things of historical, archaeological, paleontological or architectural significance.

5.4.1 OVERVIEW

Marathon acknowledges the unique culture and history of Indigenous peoples in NL and understands that they may have interests and concerns that differ from, or are in addition to, those of communities and other stakeholder groups. Marathon is committed to working constructively and in a spirit of good faith with Indigenous peoples to achieve mutually beneficial outcomes through the identification and management of environmental risks and opportunities and the successful participation of Indigenous persons in the employment and contracting opportunities associated with the Project. Marathon's approach to Indigenous engagement is based upon the promotion of constructive and meaningful ongoing dialogue characterized by the following:

- Timely notification of Project related information and provision of reasonable opportunities to review and provide feedback.
- Respect for community protocols, cultural norms, and engagement preferences.
- Accessibility in terms of language, format, and technology.
- Transparency and flexibility.
- Adherence to commitments.
- Mutual trust and good faith in communications.

The objectives of Indigenous engagement are as follows:

- To ensure that Indigenous groups are provided with opportunities to understand the Project and its potential impacts upon their interests.
- To enable Indigenous groups to provide feedback which will be considered in Project planning and execution.
- To provide a forum to discuss and respond to issues and concerns identified by Indigenous groups.
- To establish positive and constructive relationships over the life of the Project.

Marathon's engagement with Indigenous groups has focused upon two Indigenous groups with populations in proximity to the Project: MFN and QFN. Marathon has worked with each group to develop a culturally appropriate and meaningful engagement process, considering their views as to the type, nature, and frequency of engagement. Since 2019, engagement has been based upon consistent and regular contact (in-person meetings, virtual meetings, conference calls, presentations) and information exchange designed to enable each group to understand the Project and identify potential effects on their communities, activities, and asserted or established Indigenous rights. Considerable efforts have been made to provide each Indigenous group with opportunities to ask questions and provide input regarding the Project and potential effects and to comment on proposed mitigation measures.

Marathon has also concluded agreements with each Indigenous group. In May 2021, Marathon entered into a Socio-Economic Agreement (SEA) with QFN. The SEA provides a formal process for ongoing engagement and establishes joint collaborative committees respecting environmental stewardship, education and training, and procurement. In addition, provision is made for cultural investment which is currently used to support a scholarship program. The Marathon – QFN SEA was amended in mid-2023 by a supplemental agreement providing funding for permit review, enhanced cultural investment, research programs and studies and the hiring of an Indigenous environmental monitor.

Implementation of the SEA is ongoing. In 2023, five scholarships were awarded to QFN students and a member of QFN is currently employed as an environmental technician. Marathon has provided funding and in-kind support to the QFN land-based learning camp and other cultural activities and is currently exploring other opportunities for cultural initiatives and programming with the First Nation. To support QFN's economic interests, Marathon provided QFN with targeted advance notices of employment and business opportunities throughout 2023 and Indigeneity is taken into consideration in all recruitment and contracting decisions. Marathon held a virtual employment information session for QFN membership in November 2023 and QFN and Marathon also engaged in sole source contracting discussions during the first half of 2023. While the Parties were ultimately unable to reach agreement due to external factors, Marathon has committed to consideration of future sole source contracting opportunities as appropriate. Additional details respecting Marathon's relationship with QFN are provided in the sections below and in Appendix B.

In May 2021, Marathon concluded a Memorandum of Understanding (MOU) with MFN which provided for ongoing engagement, capacity funding relating to the environmental assessment process and the selection of a Community Liaison Coordinator employed by MFN and paid for by Marathon. The MOU also established the framework for SEA negotiations that were substantially completed in 2022 and final agreement on SEA terms was reached in May 2023. A formal signing ceremony was held in Conne River on August 7, 2023.

The MFN SEA provides a process for ongoing engagement and implementation, funding for the review of permits and other regulatory authorizations, continued funding for the MFN Community Liaison Officer, the establishment of an Environmental Stewardship Sub-Committee, and funding for education and training, permit review, scholarships and cultural investment, among other matters. Implementation of the

SEA is underway, and committees have been established which meet according to the SEA prescribed schedule. To support MFN's economic interests, Marathon provided MFN with targeted notices of employment and business opportunities throughout 2023 and Indigeneity is taken into consideration in all recruitment and contracting decisions. Marathon held virtual employment information sessions for MFN high school students and for MFN membership on December 7, 2023. Marathon and MFN also engaged in sole source contracting discussions during the first half of 2023 and while parties were ultimately unable to reach agreement Marathon has committed to consideration of future sole source contracting opportunities as appropriate. Finally, Marathon has engaged with each Indigenous group respecting avoidance, mitigation and monitoring measures. Marathon has met with each group to review mitigation and monitoring measures and is committed to the involvement of members of each group in monitoring programs. Since the issuance of the Decision Statement in August 2022, Marathon has consistently engaged with each Indigenous Group and has worked with each group to develop and implement a process, including the provision of capacity funding, for consultation with respect to specific follow-up programs and plans.

5.4.2 CHANGES TO THE DESIGNATED PROJECT

Section 2.16 of the Federal Decision Statement requires the Proponent to provide advance notice to the Agency of any proposed changes to the Designated Project, and Section 2.17 further requires the Proponent to submit to the Agency any additional information required by the Agency about the proposed change(s) referred to in Condition 2.16. Additional information referred to in Section 2.17 may include "the results of consultation with Indigenous groups ...on the proposed change(s)...."

In 2023, engagement respecting changes to the Designated Project included the proposed addition of the Communications Tower and the proposed Berry Project Pit Expansion. As detailed in Section 1.1, the proposed addition of Communications Tower was approved in 2023 and the details of the engagement have been included in this report. The proposed changes associated Berry Project Pit Expansion are subject to the ongoing IAAC review process, and as such, the engagement activities have not been included.

A draft description of the proposed Communications Tower was provided to MFN and QFN on December 2, 2022, for review and feedback. QFN responded on December 7, 2022, indicating that they had no serious concerns with the proposed change. On December 19, 2022, Marathon received comments from MFN. These comments as well as Marathon's responses were provided in Appendix A to the final Valentine Gold Project: Description of Project Change – Addition of a Communications Tower (Marathon 2023f), which was transmitted to each Indigenous Group on January 24, 2023, and is included in Appendix B of this report.

5.4.3 CULTURAL AWARENESS TRAINING

Marathon engaged in discussions with both MFN and QFN respecting cultural awareness training in September 2022, in accordance with Condition 7.3:

> *The Proponent shall develop, prior to construction and in consultation with Indigenous groups, cultural awareness training for all employees and contractors associated with the Designated Project. The Proponent shall implement the training prior to the start of construction and during all phases of the Designated Project.*

MFN advised that it was in the process of developing training materials and expressed interest in working with Marathon to explore future opportunities pertaining to cultural awareness training, QFN had developed cultural awareness training materials which introduced the legal status, history, and linguistic, cultural, spiritual, and socio-economic conditions of the Mi'kmaq peoples.

After a lengthy period of negotiations commencing in September 2022, Marathon and QFN entered into a licencing agreement for the use of these training materials on February 7, 2023, and since then have worked cooperatively and diligently to implement this training for all Marathon employees and contractors. Mandatory online training was implemented on March 31, 2023, and between April and December 2023, 157 Marathon employees (both site and office based) had completed training, 3 were in the process of training, and an additional 19 had registered for training. Training has also been delivered to Marathon's contractors' site-based employees. Training will continue to be implemented over the life of the Designated Project.

Marathon has committed to working with both MFN and QFN to refine and expand the scope of training materials and is currently in discussions with both groups with respect to the development of additional training modules. Marathon will also continue to engage with both Indigenous groups to identify and support opportunities for enhancement of cultural awareness and cultural sensitivity on the part of all employees.

5.4.4 PHYSICAL AND CULTURAL HERITAGE AND STRUCTURE, SITE OR THING OF HISTORICAL, ARCHAEOLOGICAL, PALEONTOLOGICAL OR ARCHITECTURAL SIGNIFICANCE

The protection of historic resources is an important issue for QFN and MFN, and this is reflected in the Conditions of EA Release.

Condition 8.1:

> *For any previously unidentified structures, sites, or things of historical, archaeological, paleontological, or architectural significance discovered within the Designated Project area by the Proponent or brought to the attention of the Proponent by an Indigenous group or another party during any phase of the Designated Project.*

Condition 8.2:

> *The Proponent shall require all employees and contractors associated with the Designated Project to undertake, before they conduct any construction activity within the Designated Project area, an awareness training program about the procedures related to the discovery and protection of structures, sites or things of historical, archaeological, paleontological or architectural significance referred to in Condition 8.1. The proponent shall develop the awareness training program in consultation with Indigenous groups.*

Representatives of MFN and QFN participated in the 2022 Historic Resources survey. The terms of the agreements concluded with each of QFN and MFN, vest the respective Environmental Stewardship Committees with authority with respect to applicable protocols relating to accidental discoveries. Marathon has worked with each group and with the Provincial Archaeology Office to develop mutually acceptable process for notification of the Provincial Archaeology Office and Indigenous groups in the event of an accidental discovery. The details of the process are referenced in the Marathon Site General Induction training and in the Construction Environmental Protection Plan (EPP). In addition, employee cultural awareness training materials reference Indigenous historic resources.

6.0 FOLLOW-UP AND MONITORING PROGRAMS

In general, where a follow-up program has been identified as a requirement of a condition, a follow-up monitoring program has been developed by subject matter experts in accordance with the requirements of Condition 2.0 and all sub-conditions.

Additionally, follow-up programs were developed in consultation with DFO, ECCC, and other relevant authorities (as required) and through engagement with MFN and QFN, as applicable. Each follow-up program contains the information required under Condition 2.5.

As part of the Indigenous engagement process, Marathon worked with each Indigenous group to establish an agreed-upon consultation process (including capacity funding) consistent with the requirements of Condition 2.4. Pursuant to this process, MFN and QFN were provided copies of the various follow-up programs for review and comment. Comments on the draft plans were submitted to Marathon by QFN on July 29, 2022, and by MFN on August 2, 2022. Marathon reviewed the comments and information provided by each Indigenous group and offered to meet to discuss the follow-up programs and any matters of concern. Marathon has advised each group how the comments provided have been taken into account, including incorporating the results of those consultations, where appropriate, as per Conditions 2.3 and 2.4. Further details are provided in Appendix B of the Valentine Gold Project: Annual Report for the Federal Environmental Assessment: 2022 Reporting Period. The follow-up programs have been implemented and will be reported on in accordance with the applicable Decision Statement Conditions from Section 2 (General Conditions). Marathon will continue to engage with each Indigenous group over the life of the follow-up monitoring program in accordance with the requirements of conditions 2.3 and 2.4 and the terms of the specific follow-up programs.

The follow-up programs are living documents that, in accordance with the ESMS, will be reviewed at defined intervals, updated, and improved upon based on the monitoring results, policy changes, and technology changes as the Project progresses through the various phases.

This section provides a summary of activities undertaken during the reporting period related to the follow-up programs required by Conditions 3.17, 3.18, 4.8, 4.9, and 6.1.

The general requirements of all follow-up programs are described in Condition 2.8:

- *2.8.1 – implement the follow-up program according to the information determined pursuant to Condition 2.5;*
- *2.8.2 – conduct monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular Condition and/or to determine the effectiveness of any mitigation measure;*
- *2.8.3 – determine whether modified or additional mitigation measure(s) are required based on the monitoring and analysis undertaken pursuant to Condition 2.8.2; and*

- *2.8.4 – if modified or additional mitigation measure(s) are required pursuant to Condition 2.8.3, develop and implement these mitigation measure(s) in a timely manner and monitor them pursuant to Condition 2.8.2.*

6.1 FISH AND FISH HABITAT FOLLOW-UP MONITORING PROGRAM

6.1.1 PROGRAM OVERVIEW

The Fish and Fish Habitat Follow-up Monitoring Program (FFHFMP) (Marathon 2023a) was developed to verify the accuracy of the EA and determine the effectiveness of the mitigation measures as they pertain to adverse environmental effects of the Designated Project on fish and fish habitat, in accordance with Condition 3.17:

> *The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Fisheries and Oceans Canada, Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as they pertain to adverse environmental effects of the Designated Project on fish and fish habitat.*

The FFHFMP provides a summary of fish species and fish habitat potentially affected by the Project and describes follow-up and monitoring activities for all phases of the Project, based on regulatory compliance requirements and Project approvals and authorizations.

Monitoring activities associated with the FFHFMP include aspects of fish rescue (Fish Rescue Plan), monitoring of offsetting measures to counterbalance habitat alteration, disruption and destruction (HADD) (Offsetting Plan), and Environmental Effects Monitoring (EEM) studies pursuant to the *Metal and Diamond Mining Effluent Regulations* (MDMER). Monitoring requirements for water quality specified in the *Fisheries Act* Authorization or through letter(s) of advice or other approvals issued for the Project are included in the Water Management Plan and the Surface Water Follow-up Monitoring Program.

6.1.2 2023 PROGRAM RESULTS

In 2023, one field program was completed in support of the FFHFMP (n addition to the water monitoring programs [in section 6.4], and the activities in support of the Water Management Plan [section 7.2]). As-built monitoring was conducted for the habitat offsetting project. This Program was conducted as per the Valentine Gold Project: Offsetting Plan, which forms part of the *Fisheries Act* Authorization for the Approved Project. The offsetting plan was developed to counterbalance Project-related HADD of fish habitat. The offsetting project involves the restoration of a portion of Victoria River Steady No. 5 via the removal of submerged pulpwood to improve fish habitat for salmonids.

As required under Condition 5.1.1.1 of the *Fisheries Act* Authorization, monitoring was conducted following the initial implementation of the offsetting project, to document the quantity of submerged pulpwood removed from Victoria River Steady No. 5 as well as the area of pulpwood removal. A report

summarizing the results of the offsetting measures conducted in 2023 – Valentine Gold Project: Year 0 (2023) As-Built Offsetting Plan Report (Stantec 2023b) – was submitted to DFO on December 21, 2023.

6.1.3 PROGRAM UPDATES / ADDITIONAL MITIGATION MEASURES

Based on the results of the 2023 as-built monitoring of the offsetting project, additional pulpwood removal and associated restoration/as-built monitoring is scheduled for 2024, with the habitat and biological monitoring program beginning in 2025 (see section 7.1.2 for additional details). Five post-restoration monitoring reports (2025, 2026, 2027, 2029 and 2030) will document habitat conditions and fish habitat utilization within the area of restoration on Victoria River Steady No. 5 and a reference area.

6.2 ACID ROCK DRAINAGE AND METAL LEACHING FOLLOW-UP MONITORING PROGRAM

6.2.1 PROGRAM OVERVIEW

The Acid Rock Drainage and Metal Leaching (ARD/ML) Management Plan (ARD/MLMP) (Marathon 2023g) was developed to verify the accuracy of the EA and determine the effectiveness of the mitigation measures as they pertain to adverse environmental effects, in accordance with Condition 3.18:

> *The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Fisheries and Oceans Canada, Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and the effectiveness of the mitigation measures as they pertain to acid rock drainage and metal leaching into the receiving environment from the Designated Project area, including from the waste rock storage areas, low- grade ore and ore stockpiles, and the tailings management facility. The Proponent shall implement the follow-up program through all phases of the Designated Project.*

The development of this plan also addresses Condition 3.15:

> *The Proponent shall develop procedures to identify and manage all mine rock that has the potential for or is already undergoing acid generation or metal leaching during all phases of the Designated Project in consultation with Environment and Climate Change Canada, Natural Resources Canada and any other relevant authorities, taking into account the Mine Environment Neutral Drainage Program's Prediction Manual for Drainage Chemistry from Sulphidic Geologic Materials, and implement these procedures during all phases of the Designated Project.*

The ARD/ML Management Plan was developed during the EA process based on consultation with DFO, ECCC, NRCan, and other relevant authorities (provincial regulatory departments) and through engagement with MFN and QFN. MFN and QFN have been advised as to how their comments were considered, including incorporating the results of those consultations where appropriate per Conditions 2.3 and 2.4. Marathon will continue to engage with each Indigenous group over the life of the follow-up program.

Further, in the second half of 2022 (post-EA release), Marathon has been engaged with the NL Department of Industry, Energy, and Technology (DIET), Mineral Development Division regarding *Mining Act* submissions and approvals. These submissions included the ARD/ML Management Plan, Phase III ARD/ML Report (described below), and how these plans relate to water management, Project design, and proposed rehabilitation and closure planning. The *Mining Act* submissions are issued to DFO and ECCC for review and comment. Comments received during this review/comment/revision process, along with the results from ongoing kinetic ARD/ML test work (humidity cells and field bin tests), were incorporated into the March 2023 update of the ARD/ML Management Plan that was issued to IAAC per Condition 3.5.

The ARD/ML Management Plan describes follow-up and monitoring activities for the construction, operation, and decommissioning/closure phases of the Project, following the Mine Environment Neutral Drainage Program's Prediction Manual and related regulatory compliance requirements and Project approvals and authorizations. The follow-up program was implemented with the commencement of the construction phase and will be followed during all Project phases, in accordance with the applicable Federal EA Conditions from Section 2 (General Conditions).

This Plan includes a summary of the characterization of the ARD/ML potential of overburden, mine waste, open pit wall rock, and rock materials to be used in construction. Note that a separate, Phase III ARD/ML Report has also been completed which contains the details on test work and assessment/modelling completed to date and provides recommendations regarding ongoing and future work. The Mine Environment Neutral Drainage Program has and will continue to be used in the assessment and management of rock and soil materials associated with the development, operation, and closure of the Project.

The Plan details confirmatory ARD and ML test work to be conducted on waste rock and tailings and construction rock during construction and operations, potentially acid-generating (PAG) rock management requirements, and water quality monitoring. The testing and management procedures outlined in the Plan are intended to ensure that acid-generating or potentially acid-generating materials are not used as construction materials (rock fill, crushed rock). The material (rock) management aspects of the plan addresses covering of all acid generating, potentially acid-generating, and potentially metal leaching materials, as well as other management procedures to protect the environment. These material management requirements cover all phases of the project and incorporated into the Project's *Mining Act* submissions and approvals as noted above, which specify how all materials (PAG and non-PAG) are managed during operations and for rehabilitation and closure such that the ARD/ML risk is managed for post-closure conditions.

6.2.2 2023 PROGRAM RESULTS

Confirmation testing, conducted in accordance with the ARD/ML Management Plan commenced in October 2022 and continued throughout 2023. Confirmatory testing included ARD and ML testing at

external laboratories based on the testing rate (samples per number of tonnes) prescribed within the requirements of the ARD/ML Management Plan.

Testing of rock samples collected from blast cuttings during construction activities in 2023 were predominantly well above the minimum criteria (neutralization potential ratio must be 2 or greater) confirming the excavated rock to be non-PAG and suitable for use as construction rock. No rock samples collected in the Marathon Pit and Tailings Management Facility area returned results below the minimum criteria (neutralization potential ratio < 2) in 2023. Out of 647 samples five (5) samples returned results below the minimum criteria (neutralization potential ratio < 2), one from Leprechaun Pit and four from the process plant area.

Testing results of all LGO and HGO samples were non-PAG. The overburden samples tested from the Marathon Pit were non-PAG, while four overburden samples from Leprechaun Pit returned results below the minimum criteria (neutralization potential ratio < 2) indicating they were PAG.

All PAG material was segregated and stockpiled in the Leprechaun Waste Rock Stockpile area for future blending and encapsulation within the waste rock stockpile in accordance with the ARD/ML Management Plan (Stantec 2023c) and the Development and Rehabilitation and Closure Plan approved by the NL DIET, Mineral Development Division.

6.2.3 PROGRAM UPDATES / ADDITIONAL MITIGATION MEASURES

A draft revised Plan (*Valentine Gold Project: Acid Rock Drainage Metal Leaching Management Plan [Proposed Revisions to Address the Addition of the Berry Pit Expansion]*) was created and submitted to the applicable provincial and federal government departments in August 2023, as part of the Berry Pit Expansion Environmental Registration / Environmental Assessment (Valentine Gold Project) Update. Until the Project Expansion is approved by federal and provincial governments and the revised version of the Plan is approved by regulators, the ARD/ML Management Plan finalized in March 2023 (Marathon 2023g) is the active plan to be followed. No additional measures have been or are proposed for implementation at this time.

6.3 AVIFAUNA FOLLOW-UP MONITORING PROGRAM

6.3.1 PROGRAM OVERVIEW

The Avifauna Follow-up Monitoring Program (AFMP) (Marathon 2022c) was developed to verify the accuracy of the EA as it pertains to use by migratory birds of surface water facilities, and to determine the effectiveness of mitigation measures to avoid harm to migratory birds and their eggs and nests, in consultation with Indigenous groups and ECCC – Canadian Wildlife Services (CWS) in accordance with Conditions 4.8 and 4.9.

Condition 4.8:

> *The Proponent shall develop, prior to construction and in consultation with relevant authorities and Indigenous groups, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the use by migratory birds, including migratory birds that are listed species at risk, of surface water facilities.*

Condition 4.9:

> *The Proponent shall develop, prior to construction and in consultation with Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of all mitigation measures to avoid harm to migratory birds, including migratory birds that are listed species at risk, their eggs, and nests.*

The AFMP describes follow-up monitoring activities and actions to be implemented to reduce potential adverse effects on birds, their eggs, and their habitat(s) during the Project, in accordance with regulatory compliance requirements and Project approvals and authorizations.

The AFMP consists of three components: breeding bird monitoring; surface water monitoring; and mortality monitoring.

6.3.2 2023 PROGRAM RESULTS

In accordance with the AFMP, breeding bird monitoring surveys are to be conducted for three consecutive years, beginning in 2023.[1] Mortality monitoring is to occur continuously throughout the Project, and monitoring of surface waterbodies will begin in the first year of the operation phase.

As the first year of construction phase monitoring, breeding bird surveys were carried out between June 9 and July 5, 2023, to document the bird species present and provide insight regarding the diversity of forest songbirds in the vicinity of the Project. The surveys consisted of point-count breeding bird surveys and autonomous recording units (ARUs). Point-counts and ARUs were distributed among three defined focal areas: treatment (<1 km from Project activities at the mine site), proximate (1-4 km from the mine site), and reference/control sites (>4 km from the mine site).

Collectively, 52 unique species were identified during the 2023 field program, of which 42 were forest birds, including two Species at Risk (SAR) (Olive-Sided Flycatcher (*Contopus cooperi*) and Rusty Blackbird (*Euphagus carolinus*)), and four Species of Conservation Concern (Nashville Warbler (*Leiothlypis ruficapilla*), Bay-Breasted Warbler (*Setophaga castanea*), Cape May Warbler (*Setophaga tigrine*), and Blackburnian Warbler (*Setophaga fusca*)). Species richness was similar between focal areas,

[1] Following which the frequency of additional monitoring will be determined based on the results of the analyses and in consultation with ECCC-CWS.

with 46 species identified in the treatment areas, and 41 species identified in both the proximate and control sites. The most abundant birds observed/recorded were those of White-Throated Sparrow (*Zonotrichia albicollis*), Ruby-Crowned Kinglet (*Corthylio calendula*), and Yellow-Bellied Flycatcher (*Empidonax flaviventris*).

There were no avifauna mortalities observed or reported at the project site in 2023.

6.3.3 PROGRAM UPDATES / ADDITIONAL MITIGATION MEASURES

The AFMP will be updated in 2024 to include targeted surveys for Short-eared Owl and Common Nighthawk being planned for the upcoming breeding season, in accordance with the provincial conditions of EA release for the Project Expansion. Results of these surveys will be provided to Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDFFA) – Wildlife Division for review. Depending on the survey results, further mitigation measures may be required.

6.4 HEALTH OF INDIGENOUS PEOPLES

Marathon has developed four follow-up programs to verify the accuracy of the EA as it pertains to adverse environmental effects of Project-related changes to the quality of air, water, and country foods on the health of Indigenous Peoples, in accordance with Condition 6.1:

> *The Proponent shall develop, prior to construction and in consultation with Indigenous groups and Health Canada and any other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of changes to the quality of air, water and country foods on the health of Indigenous Peoples, taking into account available traditional knowledge provided by Indigenous groups related to current use of lands and resources for traditional purposes.*

The four follow-up programs are described in the following sub-sections.

6.4.1 AMBIENT AIR QUALITY FOLLOW-UP MONITORING PROGRAM

The Ambient Air Quality Follow-up Monitoring Program (AAQFMP) identifies the sources of air contaminant releases during the Project and describes the mitigation measures for reducing gaseous and fugitive dust emissions associated with Project activities. The document also outlines the ambient air quality monitoring to be conducted to meet federal and provincial ambient air quality monitoring standards and criteria.

The objectives of the AAQFMP are to:

- Implement the ambient air quality monitoring program to monitor ambient particulate matter (PM) and trace metals concentrations relative to regulatory ambient air quality criteria.

- Implement mitigation measures to reduce emissions from the Project activities to the extent feasible.
- Use the ambient air quality monitoring results for PM and trace metals to implement adaptive management for fugitive dust emissions, as required.

It is anticipated that this follow-up monitoring program will be updated with further details such as specific equipment and sampling locations prior to the start of the program.

6.4.1.1 2023 PROGRAM RESULTS

In accordance with the AAQFMP, the location of the monitoring station, the frequency of sampling, and monitoring equipment criteria were confirmed via consultation with NLDECC. The recommended monitoring equipment was received in 2023 and will be installed in 2024 following the completion of the electrical power supply to the Project site.

6.4.1.2 PROGRAM UPDATES / ADDITIONAL MITIGATION MEASURES

No additional measures have been or are proposed for implementation at this time.

6.4.2 SURFACE WATER FOLLOW-UP MONITORING PROGRAM (SWFMP) PROGRAM

The Surface Water Follow-up Monitoring Program (SWFMP) (Marathon 2022m) was developed to verify the accuracy of the EA as it pertains to potential adverse environmental effects of Project-related changes to water. The primary purpose of the SWFMP is to identify the existing surface conditions, monitor the surface water and describe the management and mitigation measures that will be used to reduce the potential effects from the Project.

In addition, the SWFMP will confirm compliance with applicable regulations (e.g., MDMER under the *Fisheries Act*), the site Certificate of Approval issued by NLDECC under the *NL Environmental Protection A*ct and the Canadian Council of Ministers of the Environment (CCME) Canadian Water Quality Guidelines for the Protection of Freshwater Aquatic Life (CWQG-FAL)).

6.4.2.1 2023 PROGRAM RESULTS

In 2023, surface water samples were collected during four sampling events and analyzed in accordance with the SWFMP.

The 2023 *in situ* and laboratory surface water quality monitoring results met the NLDECC Certificate of Approval criteria and were consistent with baseline water quality results presented in the Environmental

Impact Statement (EIS) (Marathon 2020a).[2] Comparison of surface water results to MDMER requirements will commence when the Project becomes subject to the MDMER.

A summary of 2023 monitoring results can be found in the Valentine Gold Project: 2023 Surface Water Follow-up Monitoring Program report (Stantec 2023e).

6.4.2.2 PROGRAM UPDATES / ADDITIONAL MITIGATION MEASURES

No additional measures have been or are proposed for implementation at this time.

6.4.3 GROUNDWATER FOLLOW-UP MONITORING PROGRAM

The Groundwater Follow-up Monitoring Program (GWFMP) (Marathon 2022j) was developed to verify the accuracy of the EA as it pertains to adverse environmental effects of Project-related changes to water. The GWFMP defines the monitoring of groundwater levels and groundwater quality at key Project locations. Monitoring data from these locations will be used to validate the predicted effects of the Project on groundwater and to meet regulatory requirements related to specific permits and Conditions of approval.

6.4.3.1 2023 PROGRAM RESULTS

In 2023, groundwater samples were collected during four sampling events and analyzed in accordance with the GWFMP, as summarized below.

Groundwater levels and gradients were measured in 2023 with little variation between the monitoring events. Of the 21 monitor wells that were sampled, only three exhibited more than one meter in variation, with elevations lowest during October and highest during December. Groundwater analytical results were similar to baseline groundwater chemistry, with exceedances of the applied criteria for general chemistry parameters for ammonia, pH, sulfide, and total suspended solids, and for metals including aluminum, arsenic, cadmium, cobalt, copper, iron and zinc.

A summary of 2023 monitoring results can be found in the Valentine Gold Project: 2023 Groundwater Follow-up Monitoring Program report (Stantec 2023f).

6.4.3.2 PROGRAM UPDATES / ADDITIONAL MITIGATION MEASURES

Groundwater elevations are relatively stable and within the range of variation expected in a natural hydrological system, and no additional measures are proposed for implementation at this time. Groundwater quality shows no notable increasing trends of indicator parameters for the 2023 dataset,

[2] Samples from 2023 that had parameters with one or more values above the CCME CWQG-FAL include aluminum, arsenic, copper, iron, nitrate (as N), weak acid dissociated cyanide, pH, and lead. These parameters were also identified as having values above the CWQG-FAL during the Valentine Gold Project Baseline Study Appendix 3: Water Resources (Marathon Gold 2020b).

except for the total suspended solids (TSS) results for monitor well 19-MW7. Increased purging and/or well development will be implemented for all wells with elevated TSS concentrations. No additional measures have been or are proposed for implementation at this time.

6.4.4 COUNTRY FOODS FOLLOW-UP MONITORING PROGRAM

The Country Foods Follow-up Monitoring Program (CFFMP) (Marathon 2022h) was developed to verify the accuracy of the EA as it pertains to adverse environmental effects of Project-related changes to country foods on the health of Indigenous peoples. Country foods harvested from within the local assessment area are sampled on an ongoing basis to monitor the quality of terrestrial (plants, small and large mammals) and aquatic (fish) country foods, and soil samples will be collected to confirm that EA predictions are accurate and to address potential Indigenous or public concerns.

A baseline country foods sampling plan was completed in 2020. The results of the chemical analysis were then used to determine concentrations of metals in the environment to establish a baseline against which the Project and cumulative environmental effects will be assessed. Consultant Human Health and Ecological Risk Assessment (HHERA) experience and standard assessment protocols for mining projects, and metals (including mercury), were used to inform the details included in the CFFMP.

6.4.4.1 2023 PROGRAM RESULTS

In accordance with the CFFMP, the one-time sampling required during the Construction Phase is being completed in 2024. In advance of the 2024 program, social media postings requested hunters to participate in the country food program and provide large mammal (caribou, moose) tissue samples (from the fall 2023 hunting season). At the time of reporting, tissue sample collection kits had been requested and provided to hunters, however, completed sample collection kits have not yet been received.

6.4.4.2 PROGRAM UPDATES / ADDITIONAL MITIGATION MEASURES

No additional measures have been or are proposed for implementation at this time.

7.0 PLANS

In general, where a plan has been identified as a requirement of a Condition, a plan has been developed by subject matter experts in accordance with the requirements of Condition 2.0 and all sub-conditions. Additionally, plans were developed in consultation with DFO, ECCC, and other relevant authorities (as required), and through engagement with MFN and QFN. Each plan contains the information required under Condition 2.5.

As part of the Indigenous engagement on these plans, MFN and QFN were provided copies of the required plans for review and comment. Marathon received comments from each group and offered to meet with each group to discuss the plans. MFN and QFN were advised as to how their comments were considered, including incorporating results of engagement where appropriate (as per Conditions 2.3 and 2.4).

These plans have been implemented and will be reported on during all Project phases, in accordance with the applicable Decision Statement Conditions from Section 2 (General Conditions). Marathon will continue to engage with each Indigenous group on these plans over the life of the Project.

The plans are living documents that, in accordance with Marathon's ESMS, will be reviewed at a defined interval, updated, and improved upon based on monitoring results, regulatory or policy changes and technology changes as the Project progresses through the LOM phases.

The following sub-sections present an overview of the plans and any updates made during the reporting period.

7.1 FISH HABITAT OFFSETTING PLAN

Marathon developed the Valentine Gold Project Offsetting Plan, in accordance with Condition 3.1:

> *The Proponent shall develop, prior to construction and to the satisfaction of Fisheries and Oceans Canada and implement any offsetting plan related to any harmful alteration, disruption or destruction of fish and fish habitat associated with the carrying out of the Designated Project. The Proponent shall submit any offsetting plan approved by Fisheries and Oceans Canada to the Agency before implementing it.*

7.1.1 PLAN OVERVIEW

Marathon developed the Offsetting Plan (Marathon 2022k) in consultation with DFO to fulfil the requirements of the *Fisheries Act* Authorization to counterbalance project-related HADD of fish habitat. This plan details the offsetting of HADD through restoring a section of Victoria River Steady No. 5 via the removal of submerged pulpwood to improve fish habitat for salmonids. The intent is that pulpwood removal will facilitate the resuspension of fine sediment, thereby exposing the natural coarser substrates

which would have been present prior to log driving in the area. The aim of returning the Steady to its natural coarse substrate is to facilitate the spawning and rearing of salmonids.

The Offsetting Plan was submitted to DFO on May 25, 2022, and approved through issuance of the *Fisheries Act* Authorization on October 18, 2022.

7.1.2 2023 ACTIVITIES

The objectives of the offsetting measures in Year 0 (2023) were to:

- Manually remove the submerged pulpwood.
- Document the progress of offsetting activities.
- Estimate the quantity of submerged pulpwood removed.

These objectives were achieved, and the progress of the offsetting measures was documented in the report Valentine Gold Project: Year 0 (2023) As-Built Offsetting Plan Report, which was submitted to DFO on December 21, 2023 (Stantec 2023b).

An estimated 170 cords of submerged pulpwood were removed from Victoria River Steady No. 5 in 2023. Based on field conditions, including thicker than expected deposits of pulpwood and extreme temperatures, not all targeted pulpwood was removed. It is estimated that approximately 40% of the restoration area has less than 25% pulpwood coverage remaining, and the coverage over the remaining 60% is variable. Pulpwood in these areas will be removed in 2024. Based on the quantity of pulpwood removed to date and the results of the 2023 survey, it is estimated that an additional 85 cords of pulpwood will need to be removed in 2024.

7.1.3 PLAN UPDATES

There were no updates to the Offsetting Plan during the reporting period. The plan will be maintained and updated as required during all Project phases. Based on the results of the offsetting project as-built monitoring conducted in 2023, additional pulpwood removal and associated restoration/as-built monitoring is scheduled for 2024. The habitat and biological monitoring program will, therefore, begin in 2025. This change to the schedule does not result in an update to the Offsetting Plan, as it forms part of the legally binding *Fisheries Act* Authorization. DFO visited the site in August 2023, and is aware of, and supports, the revised schedule for completion and monitoring of the offsetting project.

7.2 WATER MANAGEMENT PLAN

The primary mechanism to reduce erosion and sediment during the Project is the water management infrastructure itself. Marathon developed the Water Management Plan (WMP) (Marathon 2022n), which summarizes specifications for water management infrastructure, and addresses Conditions 3.7 and 3.9.

Condition 3.7:

> *The Proponent shall develop prior to construction and implement during all phases of the Designated Project erosion and sediment control measures in a manner consistent with the fish and fish habitat protection provisions and the pollution prevention provisions of the Fisheries Act taking into account Fisheries and Oceans Canada's Measures to Protect Fish and Fish Habitat. The Proponent shall submit the measures to the Agency prior to implementing them. In doing so, the Proponent shall:*
>
> - *3.7.1 – develop, in consultation with relevant authorities, and implement measures that take into account future climate change scenarios, including periods of high water and wind, elevated snowpack, heavy rainfall and snowfall.*
> - *3.7.2 – maintain and regularly inspect, subject to safety requirements, all erosion and sediment control measures installed within the Designated Project area and document and repair any defective or damaged control measure as soon as technically feasible.*

Condition 3.9:

> *The Proponent shall manage mine effluent before it is deposited into the receiving environment during all phases of the Designated Project. In doing so, the Proponent shall:*
>
> - *3.9.1 – collect effluent, including seepage, from operation through decommissioning, including from the overburden stockpiles, ore stockpiles, waste rock piles, tailings management facility and open pits.*
> - *3.9.2 – when collecting effluent pursuant to Condition 3.9.1, construct and maintain contact water collection ditches around overburden stockpiles, ore stockpiles and waste rock piles to collect seepage during all phases of the Designated Project.*
> - *3.9.3 – treat effluent collected pursuant to Condition 3.9.1 as required in accordance with the Metal and Diamond Mining Effluent Regulations and the pollution prevention provisions of the Fisheries Act prior to its release into the environment.*

7.2.1 PLAN OVERVIEW

The WMP was developed to reduce operational risks and environmental effects of the Project. The plan objectives include:

- Reduce water inventory requiring management through perimeter berms to divert external non-contact runoff.
- Reduce the number of final discharge points through grading of ditches and construction of diversion channels to combine discharge points into water management ponds.

- Maintain flow to fish bearing streams and wetlands by maintaining pre-development catchments to the extent feasible.
- Reduce water management costs during operation through grading and gravitational drainage and thereby reduce pumping requirements.

The WMP summarizes the design criteria, information sources, project requirements, design calculations and specifications for water management infrastructure associated with the construction phase and incorporates consideration of future climate change scenarios. In addition, erosion and sediment control (ESC) measures have been developed to align with the fish and fish habitat provisions and pollution prevention provisions of the *Fisheries Act* and conditions specified in the *Fisheries Act* Authorization.

Erosion and sediment control measures are also described in the Construction EPP, which forms part of the contract documents and work packages, and erosion and sediment control specifications, including objectives, installation and removal procedures and requirements, and inspection and maintenance requirements and checklists. The contractor will update and provide implementation plans for the erosion and sediment control measures prior to the commencement of construction, where applicable.

7.2.2 2023 ACTIVITIES

In 2023, water management measures were employed based on the Water Management Plan, the Construction EPP and contractor implementation plans for ESC. These measures included four basic principles:

- Direct runoff away from active work areas before construction commences, reducing the volume of sediment-laden water to be managed.
- Limit the amount and timing of exposed soil to reduce the potential for erosion.
- Protect sensitive receptors from sediment-laden runoff by directing untreated runoff away from these areas.
- Control sediment-laden runoff leaving the site, following ESC measures put in place for the construction of the Project.

Regular inspection (minimum of once per week, and after a significant storm event) of construction activities and installed ESC measures were conducted throughout 2023. Repairs, modifications or implementation of additional measures were carried out as required. Some of the standard construction ESC measures and strategies implemented included:

- perimeter ditching with check dams to redirect and dissipate the energy of water around work fronts;
- temporary settling basins;

- pumping water from settling basins to increase capacity during precipitation events and redirecting sediment ladened water to vegetated areas or dewatering bags; and
- sediment fencing, straw bales, filter fabric, and turbidity curtains.

Despite the ESC measures implemented, site construction activities occasionally resulted in runoff containing sediment entering down gradient water courses. These occurrences took place at various locations at the Project Site and were experienced primarily as a result of singular heavy precipitation events or extended periods of rainfall in the spring and fall. Downstream effects included increased turbidity in natural waterbodies including waters frequented by fish. As such, and as outlined in Condition 2.4.1 of the *Fisheries Act* Authorization issued for the Project (DFO File No. 21-HNFL-00717), these events were reported to DFO, NLDECC and IAAC.

Further to reporting these events, Marathon consulted with regulators regarding existing ESC measures and other mitigation measures which could be utilized to address the sedimentation issues. An example of a direct result of these consultations is the procurement of alternative measures including flocculant blocks and inline treatment systems which will be deployed in 2024 to further aid in the reduction of sediment from construction run off before it enters the surrounding environment.

These consultations and additional implementations were acknowledged by DFO during follow up site inspections with positive feedback received both during the visits and in the written inspection reports which followed. Marathon will continue to consult and report similar issues in the future and is committed to the continued review and improvement of water management to ensure these occurrences are minimized or eliminated.

7.2.3 PLAN UPDATES

A 2023 revised draft WMP was created and submitted to the applicable provincial and federal government departments in August 2023, as part of the Berry Pit Expansion Environmental Registration / Environmental Assessment (Valentine Gold Project) Update. Until the Project Expansion is approved by federal and provincial governments and the revised version of the WMP is approved by regulators, the WMP finalized in September 2022 is the active plan to be followed. No additional measures have been or are proposed for implementation at this time. The plan will be maintained and updated as required during all Project phases.

7.3 FISH RESCUE PLAN

Marathon developed a Fish Rescue Plan (FRP)(Marathon 2022i), in accordance with Condition 3.10:

> *The Proponent shall, salvage and relocate fish in consultation with Fisheries and Oceans Canada prior to conducting any Designated Project activity requiring the removal of fish habitat in a manner that complies with any authorization issued under the Fisheries Act.*

7.3.1 PLAN OVERVIEW

The FRP was developed and submitted to DFO for approval as a condition of the *Fisheries Act* Authorization. The *Fisheries Act* Authorization was received in October 2022, and the FRP was finalized in September 2022. The document describes the proposed fish rescue plan which will be conducted prior to dewatering areas of in-water works and following the construction of water management infrastructure, which is predicted to result in the indirect loss of fish habitat and potential fish stranding. The objective of the fish rescue will be to remove as many fish as reasonably practical and transfer them to suitable habitat nearby that will not be affected by the Project. A secondary objective will be to collect biological data from the fish captured (i.e., number, length, weight).

Activities for salvage and relocation of fish will follow the mitigation measures, best management practices, and approval conditions in the *Fisheries Act* Authorization, as well as any requirements in other applicable permits.

Marathon has and will continue to retain an aquatic biologist will complete the relocation of fish during the fish salvage prior to conducting any work where the removal of fish habitat or dewatering of fish-bearing water is planned to occur, in compliance with the *Fisheries Act* Authorization. These activities will be completed directly prior to installation of project components such as culverts, realignment activities and instream work, as applicable. An aquatic biologist will obtain and comply with all applicable permits prior to any salvage activities.

7.3.2 2023 ACTIVITIES

No fish rescues were required in 2023.

7.3.3 PLAN UPDATES

There were no updates to the FRP during the reporting period. The plan will be maintained and updated as required during all Project phases.

7.4 CURRENT USE OF LANDS AND RESOURCES FOR TRADITIONAL PURPOSES INDIGENOUS COMMUNICATIONS PLAN

Marathon has developed the Current Use of Lands and Resources for Traditional Purposes Indigenous Communications Plan (‘the Plan’) (Marathon 2022o) to meet Conditions 7.1 and 7.2.

Condition 7.1:

> *The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a communication plan to share information with Indigenous groups on the adverse environmental effects of Designated Project activities as they relate to the current use of*

lands and resources for traditional purposes. The Proponent shall implement and maintain the communication plan during all phases of the Designated Project.

Condition 7.2:

The Proponent shall develop, as part of the communication plan referred to in Condition 7.1 and in consultation with Indigenous groups, procedures for Indigenous groups to communicate to the Proponent their concerns or views about adverse environmental effects caused by the Designated Project related to the current use of lands and resources for traditional purposes, including issues of access, and procedures for the Proponent to document and respond in a timely manner to the concerns received and demonstrate how issues have been addressed, including through the implementation of additional or modified mitigation measures. The Proponent shall implement these procedures during all phases of the Designated Project.

7.4.1 PLAN OVERVIEW

The Plan establishes a communication protocol which will be observed by Marathon in advance of conducting routine Project activities (either on-site or in the surrounding area) that may have adverse effects of the current use of lands and resources for traditional purposes by MFN or QFN. The Plan is to be read in conjunction with the Indigenous communications plan contained in Appendix A of the Accidents and Malfunctions Prevention and Response Plan (AMPRP), which addresses communication with Indigenous groups in the case of an unplanned event or accident which results in adverse environmental effects.

Marathon has engaged and will continue to engage with both MFN and QFN, respecting the potential adverse effects of the Project upon the current use of lands and resources for traditional purposes.

The Plan consists of two principal components:

- A formalized process for quarterly advance notification of planned Project activities, the nature and magnitude of potential environmental effects of those activities and associated mitigation measures.
- A formalized process for ongoing engagement. Methods of engagement include regular updates on upcoming and ongoing Project activities through e-mail, correspondence, quarterly newsletters, and periodic meetings (either virtual or in-person), transmission of reports including this Annual Report for Federal EA, and Marathon's annual Sustainability Report.

Engagement processes include opportunities for each Indigenous group to identify issues or concerns relating to the potential impact of the Project upon the current use of lands and resources for traditional purposes. These opportunities are provided through periodic meetings, including meetings of joint environmental committees established under a Socio-Economic Agreement or similar agreement to discuss environmental matters. In addition, Marathon will hold an annual meeting with each Indigenous group to discuss the Annual Report for Federal EA, the efficacy of programs referenced in EA Condition

7.1.4, and the need for any additional or modified mitigation measures. Regular engagement processes will also provide opportunities for Indigenous groups to share traditional knowledge and Marathon has committed to involving each group in monitoring programs.

In addition to opportunities for Indigenous input provided through this Plan and through agreements Marathon has concluded with Indigenous groups, Marathon has established an external Stakeholder Grievance Mechanism. Individuals or Indigenous representatives may submit complaints to Marathon through multiple avenues (phone, email, oral notification) and such complaints will be addressed within stipulated timeframes. Grievances shall be tracked and recorded and reported to Marathon's executive team and stakeholders on a periodic basis and monitored as part of the ESMS. An annual Grievance Report shall be included in Marathon's annual Sustainability Report which is published on Marathon's website and distributed to all stakeholders.

Marathon will maintain a tracking document specific to each Indigenous group that will record and document the results of the specific follow-up program, Indigenous issues and concerns, and Marathon's response to address identified issues, including any modified or additional mitigation measures.

7.4.2 2023 ACTIVITIES

Pursuant to Conditions 7.1 and 7.2, and to Section 3.2 of the Plan, Marathon issues quarterly notices to both QFN and MFN of upcoming Project-related activities 14 days in advance of the commencement of the quarter. In the event that notice is provided less than 14 days prior to the commencement of the quarter, the time period for Indigenous comment is extended. Each notice contains the following information:

- The identification of those Project activities that may affect access to or the quality of the experience of Indigenous uses of lands and resources for traditional purposes including hunting, trapping, fishing and/or gathering.
- The location, timing, duration and frequency of these Project activities.
- A preliminary identification of potential effects of the on current use of lands and resources for traditional purposes by Indigenous groups.
- Associated mitigation measures.
- A preliminary assessment of the magnitude of the potential effects (using the various magnitude classifications as contained in the Valentine Project Environmental Impact Statement).

Although the Plan stipulates that Indigenous groups have a minimum of 10 days following receipt to provide comments, Marathon has made every reasonable effort to provide a 14-day period in which to provide comments and, if comments are provided, Marathon has committed to meet with the Indigenous group to discuss.

During 2023, quarterly notices were provided as follows:

- March 11, 2023 – for upcoming activities in Q2 2023.
- June 21, 2023 – for upcoming activities in Q3 2023.
- September 15, 2023 – for upcoming activities in Q4 2023.
- December 15, 2023 – for upcoming activities in Q1 2024.

To date, no comments have been received from either Indigenous group in respect of the notices.

7.4.3 PLAN UPDATES

There were no updates to the Plan during the reporting period. The Plan will be maintained and updated as required during all Project phases.

7.5 CARIBOU PROTECTION AND ENVIRONMENTAL EFFECTS MONITORING PLAN

The Caribou Protection and Environmental Effects Monitoring Plan (CPEEMP) (Marathon 2022d) was developed, in part, to meet Condition 9.1:

> *The Proponent shall identify, prior to construction and in consultation with relevant authorities, time periods during which Designated Project activities that may adversely impact woodland caribou (Rangifer tarandus caribou) must be carried out in order to protect the species.*

Additionally, based on consultation with the NLDFFA – Wildlife Division, Marathon has developed migration-specific plans since the fall 2022 migration, to supplement the CPEEMP. The migration-specific plans focus on mitigation measures to be employed based on the construction activities being planned by Marathon within that migratory period, as the site and activities change with time.

7.5.1 PROGRAM OVERVIEW

The CPEEMP was developed in consultation with the NLDFFA – Wildlife Division, Indigenous groups, and the NLOA, to identify risks to caribou that migrate through the area semi-annually or spend time in proximity to the Project, and the mitigation and monitoring measures to be implemented to reduce Project-related effects on caribou.

Marathon has been conducting baseline caribou monitoring since 2019, including via web-based telemetry tracking of collared caribou, remote cameras, post-calving aerial surveys, and visual observations. This data, along with historical collar and demographic data provided by the NLDFFA – Wildlife Division, has been used to assess caribou activity and behaviour in proximity to the Project. The resulting information has been used to determine how Project activities may adversely affect caribou and the associated mitigation measures that will be employed over the life of the Project. Since construction

began in fall 2022, monitoring has been conducted to gather data and to support the implementation of the protection and mitigation measures as per the CPEEMP and the migration-specific plans. Near real-time monitoring has been instrumental in determining when to upgrade / downgrade protection levels based on caribou proximity to project activities and caribou behaviour (e.g. migration, post-calving) (see Table 5.1 in the CPEEMP for details on protection levels).

7.5.2 2023 ACTIVITIES

The CPEEMP was implemented with the start of construction in October 2022. The migration-specific mitigation measures and monitoring activities, first implemented for the fall 2022 migration period, were also in place for the 2023 spring and fall migrations in accordance with the CPEEMP. Caribou monitoring was conducted using collar tracking software / telemetry data, remote cameras, and visual observations via spotting scope and drone. Caribou monitoring outside of the migration periods included collar tracking (telemetry) and an aerial post-calving survey.

7.5.2.1 SPRING AND FALL MIGRATION

Migration-specific plans were developed and implemented for the spring and fall migration periods, focusing on the construction activities planned for those migratory periods and the associated mitigation measures (Marathon 2023i and 2023j). Mitigation measures included employee / contractor communication to increase awareness regarding caribou movement and required mitigations, and the requirement to report caribou sightings, and the preparation for, and implementation of, reduced construction and mining activities, traffic, and speed limits amongst other mitigation measures.

Caribou movement during the migration period is monitored via telemetry software (collar monitoring) for animals approaching and departing the site. While moving through or around the site, caribou movement was observed using direct visual observation from high points, spotting scopes and drones.

In the spring, caribou were first observed herding tighter and moving northwest at the end of March 2023, and migratory movement occurred from mid-April to early May. Several groups of caribou were observed on site post-migration through to late July, which at times led to suspension of some site activities (e.g. pit blasts being postponed) until the caribou had moved safely away. For the fall migratory period, increased monitoring and mitigation measures per the CPEEMP and the fall 2023 specific plan (Marathon 2023j) began in early October. Caribou were observed migrating through the primary migration corridor from mid-October to mid-November, and most of the caribou had moved through site by late November.

The NLDFFA - Wildlife Division and other stakeholders (e.g. NL Hydro) were informed and consulted on caribou movements, protection levels, and mitigation measures throughout the migration periods.

7.5.2.2 AERIAL SURVEY OF CARIBOU CALVING GROUNDS

To meet commitments in the CPEEMP regarding predicted changes to the Buchans and Grey River population, aerial surveys were undertaken from June 8 to June 15, 2023 to obtain herd composition

information about the Buchans herd and the Grey River caribou that calve in the zone of influence (ZOI) of the Project (17-km buffer around the mine site and 4-km buffer along the south side of the Project access road), and to complete a population estimate on the Buchans herd calving ground (outside of the ZOI). Aerial surveys were undertaken in accordance with methods and conditions outlined in Scientific Research Permit WLR2023-35 issued by NLDFFA – Wildlife Division and following direction from NLDFFA – Wildlife Division on the timing and extent of the survey area. A representative of NLDFFA – Wildlife Division also participated in the survey.

The 2023 survey objectives, area, methods and results are summarized in the report Valentine Gold Project: 2023 Aerial Survey of Caribou Calving Grounds. The 2023 Aerial Survey of Caribou Calving Grounds represents the first survey under the implemented CPEEMP. As per commitments in the CPEEMP, annual surveys will continue throughout the construction phase of the Project.

7.5.2.3 CARIBOU REMOTE CAMERA MONITORING PROGRAM – SPRING AND FALL

Remote camera monitoring of caribou, as specified in the CPEEMP, is to be conducted during the annual spring and fall migration periods for all Project phases. The spring and fall 2023 remote camera monitoring programs were the eighth and ninth surveys, respectively, in a series of remote camera surveys that began in 2019, and the second and third surveys during the construction phase of the Project.

The remote cameras were deployed several weeks prior to the typical migrations dates and retrieved several weeks after the migration concludes. The data was processed post-migration, and the objectives, area, methods and results of the camera monitoring are summarized in the reports Valentine Gold Project: Caribou Remote Camera Monitoring Program – Spring 2023 (Construction Phase)(Stantec 2023g) and Valentine Gold Project: Caribou Remote Camera Monitoring Program – Fall 2023 (Construction Phase)[3]. These reports are not intended to provide detailed analyses or comparison with remote camera data collected in previous years or seasons; rather, the data will contribute to further efforts and analyses defined in the CPEEMP. Please see Appendix 10A of the Berry Pit Expansion Environmental Registration / EA Update for an example of data consolidation (baseline data collected from submission of the Valentine Gold Project EIS in September 2020 to shortly before construction began in Fall 2022) (Stantec 2023a).

7.5.3 PLAN UPDATES

Based on consultation with the NLDFFA – Wildlife Division, Marathon had developed a migration plan specific to the fall 2022 migration to supplement the CPEEMP. Similar plans were developed for the Spring 2023 and Fall 2023 migration periods (Marathon 2023i, 2023j). The migration-specific plans focus on mitigation measures required based on the construction activities being planned by Marathon within

[3] Not yet available, as the remote cameras were retrieved (post-migration) on January 3, 2024; data analysis and reporting are ongoing.

that migratory period. During the construction phase and early operations phase, as the Project activities and project components will fluctuate in terms of location, intensity and footprint, migration-specific plans will continue to be developed for each migration period.

Marathon is in consultation with the NLDFFA – Wildlife Division with respect to all commitments respecting caribou and the CPEEMP, and review of ongoing monitoring and mitigation implementation, on an ongoing basis, prior to, during and post- migrations. Ongoing monitoring, data review and further engagement with respect to the CPEEMP will result in formal updates to the CPEEMP and to the migration-specific plans.

7.6 ACCIDENTS AND MALFUNCTIONS PREVENTION AND RESPONSE PLAN

Marathon developed an Accidents and Malfunctions Prevention and Response Plan (AMPRP) (Marathon 2022p) to meet Condition 10.3:

> *The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, an accidents, and malfunctions response plan in relation to the Designated Project.*

7.6.1 PLAN OVERVIEW

The AMPRP was developed to identify potential accidents and malfunctions that may cause adverse environmental effects and outlines mitigation, response measures for each and reporting requirements. The Indigenous Communication Plan (Appendix B) details the procedures that Marathon will employ to notify MFN and QFN upon the occurrence of accidents and malfunctions.

7.6.2 2023 NOTIFICATIONS

In 2023, there was one incident that required external reporting to regulators based on the volume of fuel released. On August 8, 2023, a damaged fuel tank sight glass on a haul truck resulted in a 150L diesel spill to the Project site haulage road. Immediate action was taken to collect the leaking fuel to prevent further release, and contaminated materials (soil/rock and fuel absorption materials) were removed from the area and stored in appropriate containers for proper disposal, in accordance with the AMPRP. Corrective actions were identified and are being implemented to prevent similar, future incidents. As set out in the Indigenous Notification Requirements of this plan (Appendix B), Marathon provided notification of the spill to both MFN and QFN on August 10, 2023.

Construction activities resulted in occasional issues with erosion and sediment control (ESC) which were identified during regular inspections and required additional or alternative mitigations. These events occurred at various locations at the Project Site and were experienced primarily as a result of heavy precipitation events or extended periods of rainfall. As such, and as outlined in Condition 2.4.1 of the

Fisheries Act Authorization issued for the Project (DFO File No. 21-HNFL-00717), these events were reported to DFO and IAAC.

Further to reporting these events, Marathon engaged in consultations with DFO and provincial regulators on mitigations currently deployed and on further mitigations needed to help address the issues identified including;

- construction of additional perimeter ditching with check dams to redirect and dissipate the energy of water around work fronts;
- construction of additional sediment basins to allow increased retention and sediment settling time;
- installation of additional pumps in the sediment basins to increase their capacity during heavy precipitation events by redirecting sediment ladened water to vegetated areas;
- installation of additional erosion and sediment control materials including sediment fencing, straw bales, filter fabric, sediment bags and turbidity curtains to aid in sediment filtering; and
- the procurement of alternative measures including flocculant blocks which will be deployed in 2024 to further aid in the reduction of sediment from construction run off before it enters the surrounding environment.

These consultations and additional implementations were acknowledged by DFO during follow up site inspections with positive feedback received both during the visits and in the follow up written reports. Marathon will continue to consult and report on any issues experienced and is committed to the continued review and improvement of water management to ensure these types of events are prevented.

7.6.3 PLAN UPDATES

There were no updates to the AMPRP during the reporting period. The AMPRP will be maintained and updated as required during all Project phases.

8.0 ADDITIONAL FOLLOW-UP PROGRAMS AND PLANS

In addition to the various follow-up programs and plans that are a requirement of a Condition set out in the Decision Statement described in Sections 6.0 and 7.0, Marathon has also developed other follow-up monitoring programs and plans. Summaries of these programs and plans are presented in Table 8-1 below.

Table 8-1 Summary of Additional Follow-up Monitoring Programs and Plans

Document Title	Document Type	Issue Date	Summary and Purpose of Program/Plan
Greenhouse Gas Emissions Follow-up Monitoring Program	Monitoring Program	2022-09-28	The purpose of the Greenhouse Gas Emissions Follow-up Monitoring Program (GHGEFMP) is to verify predictions and address commitments made in the EIS (Marathon 2020) as well as those developed through Information Requirements (IR) received as part of the regulatory review process. This document describes follow-up and monitoring activities for the construction, operation, and decommissioning/closure phases of the Project, based on regulatory compliance requirements and Project approvals and authorizations. In the context of this program, "monitoring" of greenhouse gas (GHG) emissions refers to the quantification of GHG emissions based on activities and estimates associated with the associated releases to the atmosphere, and not the direct measurement of GHG emissions.
Other Wildlife Follow-up Monitoring Program	Monitoring Program	2022-09-21	The purpose of the Other Wildlife Follow-up Monitoring Program (OWFMP) is to verify predictions and address commitments made in the EIS. The EIS is required as per Section 67(3) (a) of the *NL Environmental Protection Act.* This document describes follow-up and monitoring activities for the construction, operation, and decommissioning/closure phases of the Project, based on regulatory compliance requirements and Project approvals and authorizations. For this OWFMP, other wildlife, as defined in the EIS, includes large mammals (except caribou), furbearers and small mammals; separate Plans have been developed specific to avifauna and caribou.
Outfitters Environmental Effects Monitoring Plan	Monitoring Plan	2022-06-29	The OEEMP was requested as a Condition of approval for the Project's EIS. Marathon and the NLOA were required to develop an OEEMP to addresses outfitters effects monitoring for the construction, operation and rehabilitation, closure, and decommissioning phases of the Project. The OEEMP is intended to establish a program to monitor the effectiveness of measures to mitigate potential adverse effects upon outfitters' land and resource use and associated economic conditions. The OEEMP builds on existing information and commitments made in the EIS as well as information generated through engagement with NLOA and includes: • Mitigation objectives. • Mitigation measures. • Monitoring programs and key performance indicators to confirm that mitigation strategies are meeting mitigation objectives. The OEEMP is intended to apply to all outfitters whose operations may potentially be affected by the Project including those outfitters operating in the Regional Assessment Area (RAA) as well as outfitters operating outside the RAA that can establish a direct link between a Project effect and their business.
Construction Environmental Protection Plan	Management Plan	2022-07-05	The purpose of the Construction EPP is to outline protection and response measures associated with potential environmental effects related to Project construction activities. This plan also describes practical procedures required of all personnel (i.e., Marathon employees, contractors, and suppliers) to reduce or eliminate potential adverse environmental effects, as well as instructions for addressing planned and unplanned activities/events associated with Project construction. To avoid and reduce adverse environmental effects, best management practices will be employed throughout all Project activities.

Document Title	Document Type	Issue Date	Summary and Purpose of Program/Plan
Noise Follow-up Monitoring Program	Monitoring Program	2022-12-06	The Noise Follow-up Monitoring Program (NFMP) provides an overview of the preliminary acoustic assessment (noise monitoring and noise modeling) conducted to support the preparation of the EIS, and its methodology is based on the findings of the preliminary acoustic assessment and recommendations. The monitoring program has been developed to contribute to the mitigation, management, and monitoring of Project-related effects on sound quality. The program is based on regulatory compliance requirements and approvals and authorizations specific to the Project; however, additional mitigation, management, and monitoring details may be determined upon issuance of regulatory permitting and consultation with regulators.
Construction Traffic Management Plan	Management Plan	2022-04-26	The Construction Traffic Management Plan (TMP) is a component of the EPP. The intent of this plan is to reduce impacts on regional traffic during the construction phase of the Project. This document describes the key aspects of traffic management and controls to be implemented by Marathon associated with site access, traffic routing and management with respect to vehicle and employee transportation during the construction phase for the Project. The requirements under this Plan apply to Marathon's staff, contractors, and consultants. This plan focuses on the primary, public road network for the Project, comprising the mine access road and traffic movement through Buchans Junction and Millertown.
Waste Management Plan	Management Plan	2022-07-25	The purpose of the Waste Management Plan is to ensure that collection, storage, transportation, and disposal of all waste generated by the Project is conducted in a safe, efficient, and environmentally compliant manner. The Waste Management Plan identifies potential waste streams and establishes roles and responsibilities of the various Marathon departments and contractors as well as setting guidelines for storing and processing the waste within the various Waste Management Facilities at the Project site. This Waste Management Plan applies to construction and operations at Valentine Lake Project. All personnel, including site visitors and contractors, are required to follow the requirements outlined in the Waste Management Plan. The plan is reviewed on an annual basis and updated as necessary to accommodate changes in waste streams, or technology.
Emergency Response Plan	Management Plan	2023-01-04	The purpose of the Emergency Response Plan (ERP) is to provide an appropriate and consistent response to any reasonably foreseeable emergency that may occur at the Marathon's Project. The ERP provides the framework in the event of an emergency for the protection of life, environment, property/equipment and to identify predetermined courses of action during emergency situations at the Project. This plan defines the responsibilities of key personnel and outlines the protocols to be followed when responding to emergencies in a way that will avoid or minimize health and safety risks, reduce trauma, safety hazards, environmental damage, and reputation with efforts to return to normal business.
Rehabilitation and Closure Plan	Management Plan	2023-04-14	A Rehabilitation and Closure Plan (RCP) is a requirement for mining projects under the Newfoundland and Labrador Mining Act. The RCP discusses measures that will be undertaken to restore the Project property as close to its former use or condition as practicable, or to an alternate use or condition that is deemed appropriate and acceptable by the NL Department of Industry, Energy and Technology (NLDIET), NL Department of Environment and Climate Change (NLDECC), and NL Department of Fisheries, Forestry and Agriculture – Wildlife Division (NLDFFA – Wildlife Division). There are three key stages of rehabilitation activities that occur over the life span of the mine, which include: • Progressive rehabilitation - completed throughout the mine operation prior to closure wherever practicable to do so.

Document Title	Document Type	Issue Date	Summary and Purpose of Program/Plan
			• Closure rehabilitation – completed after mining operation ceases, to restore and/or reclaim the Project to as close to its pre-mining condition as practicable. • Post-closure monitoring and treatment – required to show that the rehabilitation has been successful. The RCP considers rehabilitation strategies that are sustainable and compatible with local and regional topography, soil and climatic conditions. The overall objectives of the RCP include: • restoration of the health and fertility of the land to a self-sustaining, natural state; • provision of an agreeable habitat for wildlife (including fish) in a balanced and maintenance free ecosystem; • creation of a landscape which is visually acceptable and compatible with surrounding terrain; • mitigation and control to within acceptable levels, the potential sources of pollution, fire risk, and public liability; and • provide a safe environment for long term public access.

9.0 REFERENCES

Canadian Environmental Assessment Act, S.C. 2012, c.19, s.52. 2012. Retrieved from https://laws-lois.justice.gc.ca/eng/acts/c-15.21/FullText.html

Canadian Council of Ministers of the Environment. 2023. Canadian Environmental Quality Guidelines. Retrieved from https://ccme.ca/en/resources

Environmental Protection Act, SNL. 2002. CHAPTER E-14.2. Retrieved from https://www.assembly.nl.ca/legislation/sr/statutes/e14-2.htm

Fisheries Act, SNL.1995, CHAPTER F-12.1. Retrieved from https://www.assembly.nl.ca/legislation/sr/statutes/f12-1.htm

Impact Assessment Agency of Canada (IAAC). 2022. Decision Statement Issued under Section 54 of the *Canadian Environmental Assessment Act, 2012*, for the Valentine Gold Project. August 23, 2022.

Impact Assessment Agency of Canada (IAAC). 2022. Valentine Gold Project Environmental Assessment Report – Valentine Gold Project. August 23, 2022.

Impact Assessment Agency of Canada (IAAC). 2022. Potential conditions under the *Canadian Environmental Assessment Act, 2012*. May 25, 2022. Accessible at https://iaac-aeic.gc.ca/050/documents/p80169/143896E.pdf

International Cyanide Management Code for the Manufacture, Transport, and Use of Cyanide in the Production of Gold, 2002. Retrieved from https://cyanidecode.org/the-cyanide-code/

Marathon Gold Corporation (Marathon). 2020. Valentine Gold Project Environmental Impact Statement. September 2020.

Marathon Gold Corporation (Marathon). 2022a. Emergency Response Plan for Valentine Lake (Draft).

Marathon Gold Corporation (Marathon). 2022b. Valentine Gold Project: Acid Rock Drainage Metal Leaching Management Plan. Version 1.0. September 2022.

Marathon Gold Corporation (Marathon). 2022c. Valentine Gold Project: Ambient Air Quality Follow-up Monitoring Program. Version 1.0. November 2022.

Marathon Gold Corporation (Marathon). 2022d. Valentine Gold Project: Avifauna Follow-up Monitoring Program. Version 1.0. October 2022.

Marathon Gold Corporation (Marathon). 2022e. Valentine Gold Project: Caribou Protection and Environmental Effects Monitoring Plan (Preliminary). Version 0.0. January 2022.

Marathon Gold Corporation (Marathon). 2022f. Valentine Gold Project: Construction Environmental Protection Plan, Version 1.0. April 2022.

Marathon Gold Corporation (Marathon). 2022g. Valentine Gold Project: Construction Traffic Management Plan. Version 1.0. April 2022.

Marathon Gold Corporation (Marathon). 2022h. Valentine Gold Project: Country Foods Follow-up Monitoring Program. Version 1.0. September 2022.

Marathon Gold Corporation (Marathon). 2022i. Valentine Gold Project: Fish Rescue Plan. September 2022.

Marathon Gold Corporation (Marathon). 2022j. Valentine Gold Project: Groundwater Follow-up Monitoring Program. Version 1.0. November 2022.

Marathon Gold Corporation (Marathon). 2022k. Valentine Gold Project: Offsetting Plan to Support the Application for a fisheries Act Authorization. April 2022.

Marathon Gold Corporation (Marathon). 2022l. Valentine Gold Project: Outfitters Environmental Effect Monitoring Plan. June 2022.

Marathon Gold Corporation (Marathon). 2022m. Valentine Gold Project: Surface Water Follow-up Monitoring Program. Version 1.0. September 2022.

Marathon Gold Corporation (Marathon). 2022n. Valentine Gold Project: Water Management Plan. Version 0.0. June 2022.

Marathon Gold Corporation (Marathon). 2022o. Valentine Gold Project: Current Use of Lands and Resources for Traditional Purposes Indigenous Communications Plan. Version 1.0. September 2022.

Marathon Gold Corporation (Marathon). 2022p. Accidents and Malfunctions Prevention and Response Plan. Version 1.0. September 2022.

Marathon Gold Corporation (Marathon). 2023a. Valentine Gold Project Fish and Fish Habitat Follow-up Monitoring Plan. Version 1.0. Jan 2023.

Marathon Gold Corporation (Marathon). 2023b. Valentine Gold Project: Greenhouse Gas Follow-up Monitoring Program. Version 0.0. January 2023.

Marathon Gold Corporation (Marathon). 2023c. Valentine Gold Project: Hazardous Waste Storage and Tracking. Revision A. November 2022.

Marathon Gold Corporation (Marathon). 2023d. Valentine Gold Project: Noise Follow-up Monitoring Plan. Version 0.0. January 2023.

Marathon Gold Corporation (Marathon). 2023e. Valentine Gold Project: Other Wildlife Follow-up Monitoring Plan. Version 0.0. January 2023.

Marathon Gold Corporation (Marathon) 2023f. Valentine Gold Project: Description of Project Change – Addition of a Communications Tower . January 13, 2023

Marathon Gold Corporation (Marathon). 2023g. Valentine Gold Project: Acid Rock Drainage Metal Leaching Management Plan. Version 2.0. March 2023.

Marathon Gold Corporation (Marathon). 2023h. Valentine Gold Project: Acid Rock Drainage Metal Leaching Management Plan (Proposed Revisions to Address the Addition of Berry Pit Expansion). Draft Version 3.0. August 2023.

Marathon Gold Corporation (Marathon). 2023i. Valentine Gold Project: Water Management Plan. Draft Version 1.0. August 2023.

Marathon Gold Corporation (Marathon). 2023j. Valentine Gold Project: Fall 2023 Caribou Migration and Monitoring Plan. Version 1.0. October 2023.

Marathon Gold Corporation (Marathon). 2023j. Valentine Gold Project: Spring 2023 Caribou Migration and Monitoring Plan. Version 1.0. March 2023.

Metal and Diamond Mining Effluent Regulations (SOR/2002-222). Retrieved from https://laws-lois.justice.gc.ca/eng/Regulations/SOR-2002-222/

Newfoundland and Labrador Department of Environment and Climate Change 2022. COR/2022/00660. Valentine Gold Project EIS Review. March 17, 2022.

Stantec Consulting Ltd (Stantec). 2023a. Berry Pit Expansion Environmental Registration / Environmental Assessment (Valentine Gold Project) Update. Date

Stantec Consulting Ltd (Stantec). 2023b. Valentine Gold Project: Year 0 (2023) As-Built Offsetting Plan Report. December 15, 2023 .

Stantec Consulting Ltd (Stantec). 2023c. ARD/ML Personal Communication. March 18 2023.

Stantec Consulting Ltd (Stantec). 2023d. Valentine Gold Project: Avifauna Follow-up Monitoring Program Report. March 6, 2024.

Stantec Consulting Ltd (Stantec). 2023e. The Valentine Gold Project: 2023 Surface Water Follow-up Monitoring Program Draft Report. February 22, 2024.

Stantec Consulting Ltd (Stantec).2023f. Valentine Gold Project: 2023 Groundwater Follow-up Monitoring Program Report. March 19, 2024.

Stantec Consulting Ltd (Stantec). 2023g. Valentine Gold Project: Caribou Remote Camera Monitoring Program- Spring 2023 (Construction Phase). Final Report. January 8, 2024.

10.0 APPENDICES

Appendix A CONDITION IMPLEMENTATION ACTIVITIES

MARATHON GOLD	VALENTINE GOLD PROJECT: ANNUAL REPORT FOR THE FEDERAL ENVIRONMENTAL ASSESSMENT: 2023 REPORTING PERIOD APPENDIX A - CONDITION IMPLEMENTATION ACTIVITIES	Version: 0.0 Date: March 2024

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
2 General Conditions			
General Conditions (2.1 to 2.2)			
2.1	The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge including community and Indigenous knowledge, available at the time the Proponent takes action, are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies.	Refer to Section 4.0 of the Annual Report.	Prior to construction and ongoing over the life of the Project.
2.2	The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement are taken in a way that is consistent with any applicable recovery strategy and action plans for listed species at risk.	The mitigation measures described in the EIS and in responses to information requests were developed in consideration of applicable recovery strategies and action plans for listed species at risk. These have been incorporated, as applicable, into the Construction Environmental Protection Plan (EPP). The EPP is embedded in Marathon's contractual management process, communicated through the Request for Proposal process, and incorporated into the contract upon award. Through their contracts with Marathon, construction contractors and sub-contractors are required to implement mitigation measures as directed. The implementation of mitigation measures is, and will continue to be, monitored throughout all Project phases.	Prior to construction and ongoing over the life of the Project.
Consultation (2.3 to 2.4)			
2.3	The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement:		
2.3.1	Provide a written notice of the opportunity for the parties being consulted to present their views and information on the subject matter of the consultation.	Refer to these sections of the Annual Report for information related to the following topics: Section 5.4.1 - General overview of consultation and engagement Section 5.4.2 - Consultation respecting proposed Changes to the Designated Project Section 5.4.3 - Engagement respecting the development and implementation of Cultural Awareness Training Materials Section 6.0 - Overview of consultation with respect to Follow-up and Monitoring Programs Section 7.4 - Engagement activities with respect to the implementation of the Current Use of Lands and Resources for Traditional Purposes Indigenous Communication Plan Section 7.6 - Engagement with respect to the Accidents and Malfunctions Prevention and Response Plan	Initiated prior to construction, and ongoing as required by the specific condition.
2.3.2	Provide all information available and relevant to the scope and the subject matter of the consultation and a period of time agreed upon with the parties being consulted, not to be less than 15 days, to prepare their views and information.	Refer to these sections of the Annual Report for information related to the following topics: Section 5.4.1 - General overview of consultation and engagement Section 5.4.2 - Consultation respecting proposed Changes to the Designated Project Section 5.4.3 - Engagement respecting the development and implementation of Cultural Awareness Training Materials Section 6.0 - Overview of consultation with respect to Follow-up and Monitoring Programs Section 7.4 - Engagement activities with respect to the implementation of the Current Use of Lands and Resources for Traditional Purposes Indigenous Communication Plan Section 7.6 - Engagement with respect to the Accidents and Malfunctions Prevention and Response Plan	Initiated prior to construction, and ongoing as required by the specific condition.
2.3.3	Undertake an impartial consideration of all views and information presented by the parties being consulted on the subject matter of the consultation.	Refer to these sections of the Annual Report for information related to the following topics: Section 5.4.1 - General overview of consultation and engagement Section 5.4.2 - Consultation respecting proposed Changes to the Designated Project Section 5.4.3 - Engagement respecting the development and implementation of Cultural Awareness Training Materials Section 6.0 - Overview of consultation with respect to Follow-up and Monitoring Programs Section 7.4 - Engagement activities with respect to the implementation of the Current Use of Lands and Resources for Traditional Purposes Indigenous Communication Plan Section 7.6 - Engagement with respect to the Accidents and Malfunctions Prevention and Response Plan Appendix B	Initiated prior to construction, and ongoing as required by the specific condition.
2.3.4	Advise in a timely manner the parties being consulted on how the views and information received have, or have not, been integrated into the subject matter of the consultation by the Proponent and provide a justification.	Refer to these sections of the Annual Report for information related to the following topics: Section 5.4.1 - General overview of consultation and engagement Section 5.4.2 - Consultation respecting proposed Changes to the Designated Project Section 5.4.3 - Engagement respecting the development and implementation of Cultural Awareness Training Materials Section 6.0 - Overview of consultation with respect to Follow-up and Monitoring Programs Section 7.4 - Engagement activities with respect to the implementation of the Current Use of Lands and Resources for Traditional Purposes Indigenous Communication Plan Section 7.6 - Engagement with respect to the Accidents and Malfunctions Prevention and Response Plan Appendix B	Initiated prior to construction, and ongoing as required by the specific condition.

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
2.4	The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this Decision Statement, communicate with each Indigenous group with respect to the manner to satisfy the consultation requirements referred to in condition 2.3, including methods of notification, the type of information and the period of time to be provided when seeking input, the process to be used by the Proponent to undertake impartial consideration of all views and information presented on the subject of the consultation, and the period of time and the means to advise Indigenous groups of how their views and information were considered by the Proponent.	In accordance with Condition 2.4, Marathon has engaged with Miawpukek First Nation (MFN) and Qalipu First Nation (QFN) to satisfy the consultation requirements referred to in Condition 2.3. Refer to section 5.4.1 of the Annual Report for a general overview of consultation and engagement. Marathon will continue in the same manner on an ongoing basis when consultation is a requirement of a condition set out in the Decision Statement.	Initiated prior to construction, and ongoing as required by the specific condition.

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
Follow-up programs (2.5 to 2.9)			
2.5 (and all sub-conditions 2.5.1 to 2.5.6)	The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, determine, as part of the development of each follow-up program and in consultation with the parties being consulted during the development, the following information, unless otherwise specified in the condition: • 2.5.1 – the methodology, location, frequency, timing and duration of monitoring associated with the follow-up program; • 2.5.2 – the scope, content and frequency of reporting of the results of the follow-up program to the parties consulted for the development of the follow-up program; • 2.5.3 – the minimum frequency at which the follow-up program must be reviewed and, if necessary, updated; • 2.5.4 – the levels of environmental change relative to baseline that would require the Proponent to implement modified or additional mitigation measure(s), including instances where the Proponent may require Designated Project activities to be stopped; • 2.5.5 – the technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change referred to in condition 2.5.4 have been reached or exceeded; and • 2.5.6 – the specific and measurable end points that must be achieved before the follow-up program can end. Those end points should indicate that the accuracy of the environmental assessment has been verified and/or that the mitigation measures are effective.	Development of the follow-up programs included determination, in consultation with the parties being consulted during the development, the information outlined in conditions 2.5.1 to 2.5.6. Refer also to section 6.0 of the Annual Report.	Completed.
2.6	The Proponent shall update the information determined for each follow-up program pursuant to condition 2.5 during the implementation of each follow-up program, at the minimum frequency determined pursuant to condition 2.5.3 and in consultation with the parties consulted during the development of each follow-up program.	Refer to section 6.0 of the Annual Report.	Ongoing throughout the duration of the follow-up program until completion of the program.
2.7	The Proponent shall provide the details of the follow-up programs referred to in conditions 3.17, 3.18, 4.8, 4.9 and 6.1, including the information determined for each follow-up program pursuant to condition 2.5, to the Agency and to the parties consulted during the development of each follow-up program prior to the implementation of each follow-up program. The Proponent shall also provide any update made pursuant to condition 2.6 to the Agency and to the parties consulted during the development of each follow-up program within 30 days of the follow-up program being updated.	Refer to section 6.0 of the Annual Report.	Ongoing throughout the duration of the follow-up program until completion of the program.
2.8 (and all sub-conditions 2.8.1 to 2.8.5)	The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement: • 2.8.1 – implement the follow-up program according to the information determined pursuant to condition 2.5; • 2.8.2 – conduct monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure; • 2.8.3 – determine whether modified or additional mitigation measure(s) are required based on the monitoring and analysis undertaken pursuant to condition 2.8.2; • 2.8.4 – if modified or additional mitigation measure(s) are required pursuant to condition 2.8.3, develop and implement these mitigation measure(s) in a timely manner and monitor them pursuant to condition 2.8.2. The Proponent shall notify the Agency within 24 hours of any modified or additional mitigation measure being implemented. If the Proponent implements any additional or modified mitigation measure not previously submitted to the Agency pursuant to condition 2.5, the Proponent shall submit a detailed description of the measure(s) to the Agency within 7 days of its implementation; and • 2.8.5 – report all results of the follow-up program to the Agency no later than March 31 following each reporting year during which the follow-up program is implemented and, subject to information determined pursuant to 2.5.2, to the parties consulted during the development of the follow-up program.	Refer to section 6.0 of the Annual Report.	Ongoing throughout the duration of the follow-up program until completion of the program.
2.9	Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss the follow-up program with each group and shall determine, in consultation with each group, opportunities for their participation in the implementation of the follow-up program, including the conduct of monitoring, the analysis and reporting of follow-up results and whether modified or additional mitigation measure(s) are required, as set out in condition 2.8.	Refer to these sections of the Annual Report for information related to the following topics: Section 5.4.1 - General overview of consultation and engagement Section 6.0 - Overview of consultation with respect to Follow-Up and Monitoring Plans Appendix B	Initiated prior to construction and ongoing throughout the duration of the follow-up program until completion of the program.
Annual reporting (2.10 to 2.12)			

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
2.10 (and all sub-conditions 2.10.1 to 2.10.7)	The Proponent shall prepare an annual report that sets out, for each reporting year: • 2.10.1 - the activities undertaken by the Proponent to comply with each of the conditions set out in this Decision Statement; • 2.10.2 - how the Proponent complied with condition 2.1; • 2.10.3 - for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation; • 2.10.4 - the information referred to in conditions 2.5 for each follow-up program and any update to that information made pursuant to condition 2.6; • 2.10.5 - the results of the follow-up program requirements identified in conditions 3.17, 3.18, 4.8, 4.9 and 6.1; • 2.10.6 - for any plan that is a requirement of a condition set out in this Decision Statement, any update(s) to the plan that have been made during the reporting year; and • 2.10.7 - any modified or additional mitigation measure implemented or proposed to be implemented by the Proponent, as determined pursuant to condition 2.8.	This table and the report to which it is appended together constitute the annual report required by condition 2.10.	March 31, 2023 and March 31 each reporting year. Ongoing over the life of the Project.
2.11	The Proponent shall submit to the Agency the annual report referred to in condition 2.10, including a plain language executive summary in both official languages, no later than March 31 following the reporting year to which the annual report applies.	The plain language executive summary in both official languages is embedded in the Annual Report to which this table is appended.	March 31, 2023 and March 31 each reporting year. Ongoing over the life of the Project.

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
2.12	The first reporting year for which the Proponent shall prepare an annual report pursuant to condition 2.10 shall start on the day the Minister of the Environment issues the Decision Statement pursuant to subsection 54 (1) of the *Canadian Environmental Assessment Act, 2012* .	The first annual report (for 2022) was submitted in March 2023, for the period beginning the day the Minister of the Environment issued the Decision Statement.	Completed.
Information sharing (2.13 to 2.14)			
2.13	The Proponent shall publish on the Internet, or any medium which is publicly available, the annual reports and the executive summaries referred to in condition 2.11 and 2.12, the reports related to accidents and malfunctions referred to in conditions 10.5.4 and 10.5.5, the communication plan for accidents and malfunctions referred to in condition 10.6, the schedules referred to in conditions 11.1 and 11.2, and any update or revision to the above documents, upon submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available for 25 years following the end of operation, or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall notify the Agency and Indigenous groups of the availability of these documents within 48 hours of their publication.	Final versions of the annual reports and executive summaries referred to in conditions 2.11 and 2.12, the reports related to accidents and malfunctions referred to in conditions 10.5.4 and 10.5.5, the communications plan for accidents and malfunctions referred to in condition 9.6, the schedules referred to in conditions 11.1 and 11.2, and any update or revision to these documents are publicly posted to the Company website (https://calibremining.com/). These documents will be maintained on the website and continue to be made publicly available until the earlier of 25 years following the conclusion of operations or the decommissioning of the Project. Marathon will notify the Agency and MFN and QFN of the availability of these documents within 48 hours of their publication.	Ongoing over the life of the Project, to an estimated 25 years following original posting.
2.14	When the development of any plan is a requirement of a condition set out in this Decision Statement, the Proponent shall submit the final plan to the Agency prior to construction, unless otherwise required through the condition.	All plans required to be developed prior to construction were submitted to the Agency prior to construction (as described in the 2022 Annual Report). Refer to sections 6.0 and 7.0 of the Annual Report for 2023 activities.	Completed.
Change of Proponent (2.15)			
2.15	The Proponent shall notify the Agency and Indigenous groups in writing no later than 30 days after the day on which there is any transfer of ownership, care, control or management of the Designated Project in whole or in part.	There was no transfer of ownership, care, control or management of the Project (in whole or in part) to another party during the 2023 reporting period. As described in section 2.0 of the Annual Report, however, Marathon notified the Agency (on January 24, 2024) that Calibre Mining Corporation (Calibre) and Marathon Gold Corporation (Marathon) had announced the completion (on January 24, 2024) of the transaction in which Calibre acquired Marathon and the Valentine Gold Project. Marathon also notified MFN and QFN of the transaction, within 30 days of the transaction.	As applicable over the life of the Project, no later than 30 days after transfer.
Change to the Designated Project (2.16 to 2.17)			
2.16 (and all sub-conditions 2.16.1 to 2.16.3)	If the Proponent is proposing to carry out the Designated Project in a manner other than described in condition 1.8, the Proponent shall notify the Agency in writing in advance of carrying out those proposed activities. As part of the notification, the Proponent shall provide: • 2.16.1 - a description of the proposed change(s) to the Designated Project and the environmental effects that may result from the change(s); • 2.16.2 - any modified or additional measure to mitigate any environmental effect that may result from the change(s) and any modified or additional follow-up requirement; and • 2.16.3 - an explanation of how, taking into account any modified or additional mitigation measure referred to in condition 2.16.2, the environmental effects that may result from the change(s) may differ from the environmental effects of the Designated Project identified during the environmental assessment.	Refer to section 1.1 of the Annual Report.	Ongoing, as applicable over the life of the Project.
2.17	The Proponent shall submit to the Agency any additional information required by the Agency about the proposed change(s) referred to in condition 2.16, which may include the results of consultation with Indigenous groups and relevant authorities on the proposed change(s) and environmental effects referred to in condition 2.16.1 and the modified or additional mitigation measures and follow-up requirements referred to in condition 2.16.2.	Refer to section 1.1, section 5.0, and Appendix B of the Annual Report.	Ongoing, as applicable over the life of the Project.
3 Fish and Fish Habitat			
3.1	The Proponent shall develop, prior to construction and to the satisfaction of Fisheries and Oceans Canada, and implement any offsetting plan related to any harmful alteration, disruption or destruction of fish and fish habitat associated with the carrying out of the Designated Project. The Proponent shall submit any offsetting plan approved by Fisheries and Oceans Canada to the Agency before implementing it.	Marathon developed the Valentine Gold Project Offsetting Plan in consultation with Fisheries and Oceans Canada (DFO), and this plan was submitted to DFO as a component of the application for Fisheries Act Authorization on May 25, 2022. DFO approved the offsetting plan as part of the issuance of the Fisheries Act Authorization on October 18, 2022. Refer also to section 7.1 of the Annual Report.	Completed.
3.2	The Proponent shall, for any fish habitat offsetting measure proposed in any offsetting plan referred to in condition 3.1 that may cause adverse environmental effects not considered in the environmental assessment, develop and implement, following consultation with relevant authorities, measures to mitigate those effects. The Proponent shall submit these measures to the Agency before implementing them.	The Valentine Gold Project Offsetting Plan, developed in consultation with DFO, was submitted to DFO as a component of the application for Fisheries Act Authorization on May 25, 2022. The offsetting plan includes the identification of potential adverse effects of the proposed offsetting project on fish and fish habitat, and measures and standards to avoid or mitigate these effects. DFO approved the offsetting plan as part of the issuance of the Fisheries Act Authorization on October 18, 2022. Refer also to section 7.1 of the Annual Report.	Completed.

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
3.3	The Proponent shall ensure, during all phases of the Designated Project, that existing fish passage is not removed in watercourses frequented by fish as a result of Designated Project activities, including building and upgrading of stream crossings and those activities that may decrease minimum watercourse flows, with the exception of watercourses that will be removed for the construction of Designated Project components as authorized under the *Fisheries Act* .	The requirement to maintain fish passage in watercourses frequented by fish is reflected in the Construction EPP and in applicable DFO letters of advice, which form part of the contract documents and work packages. Contractors' work is monitored to confirm fish passage is maintained throughout construction and post-construction. Refer also to section 6.1 of the Annual Report.	Initiated at the beginning of construction and continuing on over the life of the Project.
3.4 (and all sub-conditions 3.4.1 to 3.4.3)	The Proponent shall, during operation, withdraw water from lakes in such a way that water withdrawal does not cause adverse effects to fish and fish habitat, except if such adverse effects are otherwise authorized. In doing so, the Proponent shall: • 3.4.1 - establish, prior to construction and in consultation with Fisheries and Oceans Canada, Environment and Climate Change Canada and other relevant authorities, criteria for determining maximum withdrawal rates taking into account natural flow rates and seasonality; • 3.4.2 - calculate maximum withdrawal rates for each month that withdrawal will be necessary and provide them to the Agency; and • 3.4.3 - implement water withdrawal, such that withdrawal rates remain below the maximum rates for each month calculated pursuant to condition 3.4.2.	Fish and fish habitat will not be adversely affected by water withdrawal from lakes, except as otherwise authorized. The criteria for determining maximum withdrawal rates taking into account natural flow rates and seasonality were established in consultation with DFO during meetings in advance of submittal of the application for Fisheries Act Authorization. Consultations with NL Hydro, who operate Victoria Lake (Hydro) Reservoir from which water for the Project is withdrawn, to ensure that normal and maximum withdrawal rates (and water return rates via effluent discharge) were understood by NL Hydro and could be managed within the operating plan for the reservoir. ECCC will be consulted on operational water withdrawal and process effluent discharge to the reservoir. Monthly maximum withdrawal rates were included in the application upon which the issued Fisheries Act Authorization is based, whereby a flow reduction of >10% mean annual flow is the threshold for potential adverse effects on fish habitat that require counterbalancing via the offsetting plan. Water withdrawal will be monitored during operation via flow meters to assure that the withdrawal rates remain below the maximum calculated rates	To be implemented prior to water withdrawal and continuing on over the life of the Project.

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
3.5	The Proponent shall maintain, during all phases of the Designated Project, a buffer zone of undisturbed vegetation along the edge of any water body and watercourse of sufficient width to protect fish and fish habitat resulting from the construction of Designated Project components, unless such adverse effects are otherwise authorized under the *Fisheries Act* .	Except where authorized under the Fisheries Act, Marathon has maintained, and will continue to maintain, a buffer zone of undisturbed vegetation along the edge of waterbodies and watercourses of sufficient width to protect fish and fish habitat. The Construction EPP specifies a 50 m vegetated buffer for Victoria River, and a 30 m vegetated buffer for all other waterbodies. These buffer zones are included in the design drawings provided to the contractor, and the Construction EPP forms part of the contract documents and work packages. Refer also to section 6.1 of the Annual Report.	Initiated at the beginning of construction and continuing on over the life of the Project.
3.6 (and all sub-conditions 3.6.1 to 3.6.2)	The Proponent shall undertake, in consultation with relevant authorities, progressive reclamation of areas disturbed by the Designated Project, including bank and riparian areas. In doing so, the Proponent shall: • 3.6.1 – identify plant species native to the regional assessment areas identified in Figure 3 of the environmental assessment report; and • 3.6.2 – use the plant species identified in 3.6.1 for use in establishing self-sustaining communities	A Rehabilitation and Closure Plan (RCP) is a requirement for mining projects under the Newfoundland and Labrador Mining Act. The RCP describes measures that will be undertaken to restore the Project property as close to its former use or condition as practicable, or to an alternate use or condition that is deemed appropriate and acceptable by the NL Department of Industry, Energy and Technology (NLDIET), NL Department of Environment and Climate Change (NLDECC), and NL Department of Fisheries, Forestry and Agriculture – Wildlife Division (NLDFFA – Wildlife Division). In 2022, Marathon developed a Project RCP that addresses the three key stages of rehabilitation activities that occur over the life span of the mine: progressive rehabilitation, closure rehabilitation, and post-closure monitoring and treatment. The RCP was submitted to NLDIET in November 2022, and following additional consultation and revision, the RCP was finalized in April 2023. Marathon will endeavour to source and use these species in establishing self-sustaining communities throughout progressive reclamation of disturbed areas, including bank and riparian areas. A key objective of the rehabilitation and closure program for the Project is to create the necessary conditions for the re-establishment and long-term propagation of indigenous vegetative species in the areas disturbed by Project related construction activities, and natural revegetation will be encouraged throughout the Project area. In 2023, Marathon commenced discussions with an Indigenous group regarding seeding and revegetation studies and trials, using native species, to commence in 2024.	To start at the earliest opportunity for progressive reclamation and continue on over the life of the Project.
3.7 (and all sub-conditions 3.7.1 to 3.7.2)	The Proponent shall develop prior to construction and implement during all phases of the Designated Project erosion and sediment control measures in a manner consistent with the fish and fish habitat protection provisions and the pollution prevention provisions of the *Fisheries Act* taking into account Fisheries and Oceans Canada's Measures to Protect Fish and Fish Habitat. The Proponent shall submit the measures to the Agency prior to implementing them. In doing so, the Proponent shall: • 3.7.1 – develop, in consultation with relevant authorities, and implement measures that take into account future climate change scenarios, including periods of high water and wind, elevated snow pack, heavy rainfall and snowfall; and • 3.7.2 – maintain and regularly inspect, subject to safety requirements, all erosion and sediment control measures installed within the Designated Project area and document and repair any defective or damaged control measure as soon as technically feasible.	Erosion and sediment control measures were developed to align with the fish and fish habitat provisions and pollution prevention provisions of the Fisheries Act and taking into account DFO's Measures to Protect Fish and Fish Habitat. The application for authorization pursuant to the Fisheries Act included erosion and sediment control measures, and applicable conditions are specified in the Fisheries Act Authorization. The primary mechanism to reduce erosion and sediment during the Project is the water management infrastructure itself. The Water Management Plan summarizes the design criteria, information sources, project requirements, design calculations and specifications for water management infrastructure associated with the Early Works Construction Phase and incorporates consideration of future climate change scenarios. Erosion and sediment control measures are also described in the Construction EPP, which forms part of the contract documents and work packages, and erosion and sediment control specifications, including objectives, installation and removal procedures and requirements, and inspection and maintenance requirements. The site environmental team employs an inspection checklist and the construction coordinators are completing Construction Daily Activity Reports (CDARs) that highlight sediment and erosion control features that are either in place or installed. The contractors continue to update and provide implementation plans for the erosion and sediment control measures prior to the commencement of construction activities, as applicable. Marathon consults with relevant authorities on an ongoing, as-needed basis and will continue to update the Agency as applicable. Erosion and sediment control measures were implemented at the onset of construction, and are being maintained and regularly inspected, with any defective or damaged control measures documented and repaired as soon as technically feasible. See also section 7.2 of the Annual Report.	Implemented prior to the start of construction and continuing on over the life of the Project.
3.8	The Proponent shall remove all vegetation from the tailings management facility containment zone during construction and prior to filling or flooding to reduce the potential generation of methylmercury.	To reduce the potential for generation of methylmercury, all vegetation is being removed from the tailings management facility (TMF) containment zone during construction, and this will be fully completed prior to filling or flooding the TMF. This mitigation is included in the Construction EPP, which forms part of the contract documents and work packages.	Initiated with development of the TMF; to be completed prior to filling or flooding the TMF containment zone.

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
3.9 (and all sub-conditions 3.9.1 to 3.9.3)	The Proponent shall manage mine effluent before it is deposited into the receiving environment during all phases of the Designated Project. In doing so, the Proponent shall: • 3.9.1 - collect effluent, including seepage, from operation through decommissioning, including from the overburden stockpiles, ore stockpiles, waste rock piles, tailings management facility and open pits; • 3.9.2 - when collecting effluent pursuant to condition 3.9.1, construct and maintain contact water collection ditches around overburden stockpiles, ore stockpiles and waste rock piles to collect seepage during all phases of the Designated Project; and • 3.9.3 - treat effluent collected pursuant to condition 3.9.1 as required in accordance with the *Metal and Diamond Mining Effluent Regulations* and the pollution prevention provisions of the *Fisheries Act* prior to its release into the environment.	See section 7.2 of the Annual Report.	Initiated during construction and continuing on over the life of the Project.
3.10	The Proponent shall, salvage and relocate fish in consultation with Fisheries and Oceans Canada prior to conducting any Designated Project activity requiring the removal of fish habitat in a manner that complies with any authorization issued under the *Fisheries Act* .	See section 7.3 of the Annual Report.	Implemented prior to Project activity requiring removal of fish habitat per the fish rescue plan, as applicable.
3.11	The Proponent shall conduct any in-water work activities, outside of restricted activity timing windows for fish species in accordance with Fisheries and Oceans Canada's *Timing Windows to Conduct Projects in or Around Water* for Newfoundland and Labrador, unless otherwise permitted by Fisheries and Oceans Canada.	In-water work activities are being scheduled, to the extent practicable, to occur outside of the restricted activity timing windows for fish species located within the watershed. Culverts needed to be installed within this timing window, and Marathon consulted DFO; DFO issued a Letter of Advice for this work (see section 3.1 of the Annual Report for details). Knowledgeable staff were on site as required to monitor the watercourse for the presence of redds and/or spawning fish in the area and to relocate fish as applicable.	Ongoing over the life of the Project, as applicable.
3.12	If the Proponent must conduct any in-water work activities related to construction during the restricted activity timing windows, the Proponent shall develop and implement additional mitigation measures, in consultation with Fisheries and Oceans Canada, to protect fish during sensitive life stages, including migration and spawning. The Proponent shall submit these measures to the Agency prior to implementing them.	Following the submission to DFO of a Request for Review for culvert installations that could not avoid the restricted timing window, DFO issued an amended Letter of Advice for Repairs, Upgrades, and Placement of Culverts and Bridges along Access and Haul Roads (on October 27, 2023, and renewed on December 20, 2023). The Letter of Advice includes the requirement to maintain fish passage and specifies the parameters needed to maintain appropriate depth and flow, to which Marathon will adhere.	Ongoing over the life of the Project, as applicable.
3.13	The Proponent shall, prior to construction, install screens on the water supply intake structures taking into account Fisheries and Oceans Canada's *Interim Code of Practice for End-of-Pipe Fish Protection Screens for Small Water Intakes in Freshwater* and in a manner that is consistent with any authorization issued under the *Fisheries Act* and its regulations.	The design of the fish screen size for use during pumping and water intakes is consistent with the *Fisheries Act* authorization and letters of advice issued for the Project, and has been informed by Fisheries and Oceans Canada's *Interim Code of Practice for End-of-Pipe Fish Protection Screens for Small Water Intakes in Freshwater* , which provides national guidance on the design and installation of small end-of-pipe water intake fish screens to prevent entrainment and impingement of fish (updated from the 1995 Freshwater Intake End-of-Pipe Fish Screen Guideline). Installation of the pumps has been / is being monitored during construction to confirm appropriate sizing and placement of screens.	To start during construction of water supply intake structures / installation of pumps and be completed prior to operating pumps.

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
3.14	The Proponent shall develop, in consultation with Fisheries and Oceans Canada and any other relevant authorities prior to the start of blasting activities in or near water and implement, during blasting activities in or near water, mitigation measures to avoid adverse effects to fish and fish habitat from the use of explosives taking into account Fisheries and Oceans Canada's *Guidelines for the use of explosives in or near Canadian fisheries waters* and implement the measures in a manner consistent with the *Fisheries Act* and its regulations. The Proponent shall provide these measures to the Agency before implementing them.	No blasting activities occurred in or near water in 2023. Should blasting in or near water be required, mitigation measures will be developed prior to the start of blasting activities in consultation with Fisheries and Oceans Canada and any other relevant authorities and in consideration of Fisheries and Oceans Canada's Guidelines for the Use of Explosives in or near Canadian Fisheries Waters. Measures to avoid adverse effects to fish and fish habitat will be implemented in a manner consistent with the Fisheries Act and its regulations, and the Agency will be provided with any such measures prior to their implementation.	Prior to any blasting activities in or near water and continuing over the life of the Project, as applicable.
3.15 (and all sub-conditions 3.15.1 to 3.15.4)	The Proponent shall develop procedures to identify and manage all mine rock that has the potential for or is already undergoing acid generation or metal leaching during all phases of the Designated Project in consultation with Environment and Climate Change Canada, Natural Resources Canada and any other relevant authorities, taking into account the Mine Environment Neutral Drainage Program's Prediction Manual for Drainage Chemistry from Sulphuric Geologic Materials, and implement these procedures during all phases of the Designated Project. In doing so, the Proponent shall: • 3.15.1 - characterize, prior to construction, the acid rock drainage and metal leaching potential of the overburden and other mine rock to be used for construction; • 3.15.2 - conduct geochemical testing of waste rock and tailings during operation to verify the magnitude and onset of potential acid rock drainage in waste rock and tailings; • 3.15.3 - taking into account the geochemical testing in condition 3.15.2, develop procedures for segregation of potentially acid generating and metal leaching materials and additional mitigation for storage of waste rock, low-grade ore and other ore; • 3.15.4 - cover all acid generating, potentially acid-generating, and potentially metal leaching materials with an oxygen-limiting barrier prior to the onset of acid rock drainage unless not technically or economically feasible. If not technically or economically feasible, the proponent shall develop additional procedures to prevent the contamination of the receiving environment by acid generating, potentially acid generating, and potentially metal leaching materials, and implement these measures. The proponent shall submit these measures to the Agency prior to implementation; and • 3.15.5 - not use any acid generating and potentially acid generating materials for construction purposes, including earthworks and grading.	Refer to section 6.2 of the Annual Report.	Prior to construction and continuing on over the life of the Project.
3.16	The Proponent shall store fuel and hazardous materials a minimum of 200 meters from the tributaries of the Victoria River as identified under Fisheries and Oceans Canada's Newfoundland and Labrador Scheduled Salmon Rivers and 100 meters from all other waterbodies.	The requirement to store fuel and hazardous materials a minimum of 200 meters from the tributaries of the Victoria River as identified under Fisheries and Oceans Canada's Newfoundland and Labrador Scheduled Salmon Rivers and 100 meters from all other waterbodies has been incorporated in the Construction EPP, which forms part of the contract documents and work packages. Fuel and hazardous materials storage is, and will continue to be, monitored during all Project phases to confirm compliance.	Initiated during construction and continuing on over the life of the Project.

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
3.17 (and all sub-conditions 3.17.1 to 3.17.5)	The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Fisheries and Oceans Canada, Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as they pertain to adverse environmental effects of the Designated Project on fish and fish habitat. The Proponent shall implement the follow-up program during all phases of the Designated Project, taking into account the Monitoring Framework in Section 7.9.1 of the environmental impact statement and including the environmental effects monitoring requirements set out in Schedule 5 of the *Metal and Diamond Mining Effluent Regulations* . As part of the follow-up program, the Proponent shall: • 3.17.1 - monitor open pits for the development of high hydraulic conductivity zones, as well as groundwater levels and groundwater flows associated with pit dewatering and pit filling to verify long-term hydraulic containment within the pits that may enhance groundwater flow; • 3.17.2 - monitor, during all phases of the project, surface water and groundwater flows, levels and quality to verify the assessment predictions identified in Appendices 7A, 7B and 7C of the environmental impact statement; • 3.17.3 - monitor, during all phases of the Designated Project, in consultation with relevant authorities, and taking into account the Canadian Council of Ministers of the Environment's Canadian Water Quality Guidelines for Protection of Aquatic Life, contaminants of concern prescribed by the Metal and Diamond Mining Effluent Regulations as well as mercury, chromium, nitrogen, and phosphorous at locations identified in Section 7.9.1 of the environmental impact statement and at offshore locations on Valentine and Victoria lakes to confirm the zone of influence predicted in the assimilative capacity assessment in appendix 7C of the environmental impact statement; • 3.17.4 - monitor, during decommissioning, and in consultation with Indigenous groups, Environment and Climate Change Canada and other relevant authorities, the water quality of the pit lake during filling to verify that it complies with the pollution prevention provisions of the Fisheries Act prior to connecting it to the receiving environment; and • 3.17.5 - if the results of the monitoring referred to in conditions 3.17.1, 3.17.2, 3.17.3 or 3.17.4 demonstrate that modified or additional mitigation measures are required to protect fish and fish habitat from changes to water quality, develop and implement modified or additional mitigation measures. The Proponent shall submit these measures to the Agency before implementing them.	Refer to Annual Report sections 6.4.2 and 6.4.3 for surface water and groundwater follow-up monitoring program activities and results. Groundwater levels and flows are being monitored during construction, as applicable. Monitoring during 2023 has indicated that groundwater elevations are relatively stable and within the range of variation expected in a natural hydrological system (see Annual Report section 6.4.3). Monitoring of the open pits for the development of high hydraulic conductivity zones, and of groundwater levels and flows associated with pit dewatering and pit filling (to verify long-term hydraulic containment within the pits that may enhance groundwater flow) will be conducted during the operation phase. Surface water and groundwater flows, levels and quality are being monitored and will continue to be monitored during all Project phases to verify the EIS assessment predictions. Contaminants of concern prescribed by the Metal and Diamond Mining Effluent Regulations, as well as mercury, chromium, nitrogen, and phosphorous, will be monitored at locations agreed-upon with the applicable regulatory authorities, to confirm the zone of influence predicted in the assimilative capacity assessment in the EIS. Water quality of the pit lake during filling will be monitored, during decommissioning and in consultation with Indigenous groups, Environment and Climate Change Canada, and other relevant authorities, to verify that it complies with the pollution prevention provisions of the Fisheries Act prior to connecting it to the receiving environment. If the results of the monitoring referred to in conditions 3.17.1, 3.17.2, 3.17.3 or 3.17.4 demonstrate that modified or additional mitigation measures are required to protect fish and fish habitat from changes to water quality, these will be developed in consultation with Indigenous groups and the relevant authorities and provided to the Agency prior to their implementation.	Initiated prior to construction and continuing on over the life of the Project.

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
3.18	The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Fisheries and Oceans Canada, Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and the effectiveness of the mitigation measures as they pertain to acid rock drainage and metal leaching into the receiving environment from the Designated Project area, including from the waste rock storage areas, low- grade ore and ore stockpiles, and the tailings management facility. The Proponent shall implement the follow-up program through all phases of the Designated Project.	Refer to section 6.2 and Appendix B of the Annual Report.	Initiated prior to construction and continuing on over the life of the Project.
4 Migratory Birds			
4.1	The Proponent shall carry out the Designated Project, including vegetation clearing and blasting, in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's Guidelines to reduce risk to migratory birds.	Marathon is carrying out the Project, including vegetation clearing and blasting, in such a way that it protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. Work is being undertaken in compliance with the Migratory Birds Convention Act, 1994, the Migratory Birds Regulations, and the Species at Risk Act. Environment and Climate Change Canada's Guidelines to reduce risk to migratory birds have been taken into account in developing the mitigation measures, which have been incorporated into the migratory birds follow-up monitoring program, and specified in the Construction EPP which forms part of the contract documents and work packages. Refer to Section 6.3 of the Annual Report	Initiated at the beginning of construction and continuing on over the life of the Project.
4.2	The Proponent shall conduct vegetation clearing outside of the applicable regional nesting periods for the Designated Project area, unless not technically feasible. If not technically feasible, the Proponent shall develop and implement additional mitigation measures, in consultation with Environment and Climate Change Canada, including the use of non-intrusive monitoring methods and setbacks. The Proponent shall submit these measures to the Agency prior to their implementation.	Vegetation clearing in 2023 was conducted outside of the regional nesting period for the area (April 15 to August 15). Marathon will endeavour to continue to conduct vegetation clearing outside of the nesting periods. If it is not technically feasible for these activities to avoid this period, Marathon will develop and implement additional mitigation measures in consultation with Environment and Climate Change Canada, including monitoring and setbacks to avoid adverse effects on migratory birds, and their nests and eggs. Any such mitigation measures will be submitted to the Agency prior to their implementation.	Ongoing over the life of the Project.
4.3	The Proponent shall delineate, prior to the start of tree clearing, the areas in the Designated Project area where tree clearing, including along roads, will take place and shall not undertake any tree clearing outside these areas, unless required for health and safety reasons.	Prior to the start of tree clearing in an area (including along roads), the area to be cleared is delineated, and no tree clearing is permitted outside of the demarcated area (unless required for health and safety reasons). This measure is included in the Construction EPP, which forms part of the contract documents and work packages.	Prior to tree clearing and continuing on over the life of the Project until all tree clearing is completed.
4.4 (and sub-condition 4.4.1)	The Proponent shall, during construction, operation and decommissioning, use and maintain noise- dampening technologies on all vehicles and heavy equipment used in the Designated Project area. In doing so the Proponent shall: • 4.4.1 - keep the technologies in good working order through the implementation of a regular inspection program.	Noise-dampening technologies are being used and maintained on vehicles and heavy equipment during construction and will continue to be used and maintained throughout operation and decommissioning. Equipment is regularly inspected to ensure proper working order of noise dampening technology, and contractors are required to report on maintenance of equipment, including noise dampening technology, to Marathon as part of regular monthly compliance reporting. These requirements are reflected in the Construction EPP, which forms part of the contract documents and work packages.	Initiated at the beginning of construction and continuing on over the life of the Project.
4.5	The Proponent shall establish speed limits in accordance with provincial regulations on temporary and permanent roads located within the Designated Project area and require that all persons abide by these speed limits.	Speed limits have been established in accordance with provincial regulations and industry standards (e.g., for haul roads). During the caribou migration periods, additional speed restrictions (determined in consultation with the NL Department of Fisheries, Forestry and Agriculture [NLDFFA] – Wildlife Division) are posted and communicated to employees and contractors. Project vehicles are required to comply with posted speed limits in all areas, and compliance will continue to be monitored throughout all Project phases.	Initiated at the beginning of construction and continuing on over the life of the Project.
4.6	The Proponent shall control lighting required for the construction, operation and decommissioning of the Designated Project, including direction, timing and intensity, to avoid adverse effects on migratory birds including migratory birds that are listed species at risk, while meeting health and safety requirements.	Project lighting is limited to that which is necessary for safe and efficient activities, with consideration for lighting design guidelines such as the Commission Internationale de L'Éclairage, International Dark Sky Association, and Illuminating Engineering Society. To avoid adverse effects on migratory birds, only the amount of lighting required for safe construction and operation activities is being installed, and exterior lights are low intensity and shielded from above (providing downward illumination), where practicable. Excessive use of mobile flood lighting units is avoided, and these units are turned off when not required. Full cut-off luminaires are being used where practicable to reduce glare, light trespass and sky glow from Project lighting and, to the extent feasible without affecting safe mine operations, operation time of exterior lighting is limited, in particular during sensitive wildlife periods.	Initiated at the beginning of construction and continuing on over the life of the Project.
4.7 (and all sub-conditions 4.7.1 to 4.7.2)	The Proponent shall implement, during all phases of the Designated Project, measures to prevent the killing or harming of migratory birds including migratory birds that are listed species at risk, due to their use of the tailings management facility, including by: • 4.7.1 - maintaining embankments of the tailings management facility and the sedimentation ponds free of vegetation during operation; and • 4.7.2 - installing and operating, during operations, a cyanide destruction circuit to minimize cyanide concentrations in mine effluent.	Marathon will implement measures to prevent the killing or harming of migratory birds due to their use of the tailings management facility. Embankments of the tailings management facility and sedimentation ponds will be maintained free of vegetation during operations to reduce the attractiveness of the facilities to birds, and a cyanide destruction circuit will be installed and operated to minimize cyanide concentrations in mine effluent. Cyanide detoxification within the mill is part of the Project design, which will result in the degradation of cyanide and precipitation of metals prior to discharge to the tailings management facility. Refer to section 6.3.1 of the Annual Report.	To start after construction of the tailings management facility and continue on over the life of the Project.

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
4.8 (and all sub-conditions 4.8.1 to 4.8.3)	The Proponent shall develop, prior to construction and in consultation with relevant authorities and Indigenous Groups, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the use by migratory birds, including migratory birds that are listed species at risk, of surface water facilities. As a part of the implementation of the follow-up program, the Proponent shall: • 4.8.1 - develop water quality objectives for the protection of migratory birds for surface water facilities in consultation with relevant authorities; • 4.8.2 - monitor the use by migratory birds of open aquatic areas, including the tailings management facility during all phases of the Designated Project until such time that water quality in these structures meet legislative requirements and water quality objectives developed pursuant to condition 4.8.1; and • 4.8.3 - if results of the monitoring pursuant to condition 4.8.2 indicate that migratory birds use these open aquatic areas, develop and implement mitigation measures including but not limited to deterrent measures and/or exclusionary measures.	The follow-up program to verify the accuracy of the environmental assessment as it pertains to use by migratory birds of surface water facilities was developed in consultation with Indigenous groups and Environment and Climate Change Canada – Canadian Wildlife Services. Marathon will continue to engage with each Indigenous group over the life of the follow-up program. Given the linkages between birds and quality of water in the surface water facilities, aspects of the follow-up program are addressed in the Surface Water Follow-up Monitoring Program; however, the primary migratory bird follow-up and monitoring measures are detailed in the Avifauna Monitoring Plan, including processes for monitoring bird use of the Project-related surface water facilities, and approaches to adaptive mitigation. Monitoring parameters and schedules for water quality objectives for surface water facilities and protecting receiving waterbodies and, thereby migratory birds, are covered in the Surface Water Follow-up Monitoring Program (see Annual Report section 6.4.2). The follow-up program will be implemented and reported on during all Project phases, in accordance with the applicable Section 2 EA conditions (General Conditions).	Initiated prior to construction and continuing on for the duration of the follow-up program until completion of the program.

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
4.9 (and all sub-conditions 4.9.1 to 4.9.2)	The Proponent shall develop, prior to construction and in consultation with Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of all mitigation measures to avoid harm to migratory birds, including migratory birds that are listed species at risk, their eggs and nests. The follow-up program shall include the mitigation measures used to comply with conditions 4.1 to 4.6. As part of the development of the follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of mitigation measures. The Proponent shall implement the follow-up program during all phases of the Designated Project. As part of the follow-up program, the Proponent shall: • 4.9.1 - have a qualified individual conduct surveys within the Designated Project area, every year for three years, from the beginning of construction, to confirm the presence of migratory birds, including migratory birds that are listed as species at risk; and • 4.9.2 - after three years, determine, in consultation with Environment and Climate Change Canada, the frequency of additional surveys based on the results of the surveys conducted pursuant to 4.9.1.	The follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of all mitigation measures to avoid harm to migratory birds and their eggs and nests was developed in consultation with Indigenous groups and Environment and Climate Change Canada – Canadian Wildlife Services. Marathon will continue to engage with each Indigenous group over the life of the follow-up program. The follow-up program will be implemented and reported on during all Project phases, in accordance with the applicable Section 2 EA conditions (General Conditions). Refer to Annual Report section 6.3 for avifauna follow-up monitoring program activities and results.	Initiated prior to construction and continuing on for the duration of the follow-up program until completion of the program.
5 Greenhouse Gas Emissions			
5.1	The Proponent shall develop the Designated Project area and optimize activities associated with the operation of the Designated Project so as to minimize transportation and distances required to travel within the Designated Project area.	The Project has been designed (and is being constructed and will be operated) to optimize transportation and distances required to travel, especially as it pertains to the movement of mine haulage trucks. Logistics and transportation planning and management for construction and operations includes utilizing busing for personnel, and efficient load planning and management for materials transport to and from the site along the site access road. Transportation of materials to and from the site is employing a laydown and marshalling yard in Millertown and warehousing/laydown on site to maximize load efficiency in both directions. The Construction Traffic Management Plan is described in Table 8-1 of the Annual Report.	Initiated September 2020 and continuing on over the life of the Project.
5.2	The Proponent shall ensure all equipment and vehicles associated with the Designated Project, including those equipment and vehicles operated by third-party contractors, are serviced and maintained in accordance with the manufacturer's maintenance guidelines.	Equipment and vehicles, including those operated by contractors and sub-contractors, is serviced regularly and maintained in accordance with the manufacturer's maintenance guidelines. Contractors are required to report on maintenance of equipment to Marathon as part of regular monthly compliance reporting. These requirements are reflected in the Construction EPP, which forms part of the contract documents and work packages.	Initiated at the start of construction and continuing on over the life of the Project.
5.3 (and all sub-conditions 5.3.1 to 5.3.2)	The Proponent shall develop, prior to construction and in consultation with relevant authorities, measures to reduce the fuel consumption of equipment and vehicles associated with the Designated Project, including those operated by the Proponent and other third-party contractors. The Proponent shall apply the measures during all phases of the Designated Project. The measures shall include: • 5.3.1 – the development of no-idling and cold start policies for equipment and vehicles operating in the Designated Project area; and • 5.3.2 – procedures to ensure that any person complies with the policies developed pursuant to condition 5.3.1, unless there are technical constraints related to the operation of the equipment and vehicles or constraints related to health or safety.	No-idling and cold start policies were developed in consultation with relevant authorities and are being implemented for mobile equipment and vehicles operating in the Project area. Monitoring is being conducted to verify conformance with these policies, including by contractors, subject to technical constraints related to the operation of the equipment and vehicles, or constraints related to health or safety.	Initiated prior to construction and continuing on over the life of the Project.
6 Health and Socio-Economic Conditions of Indigenous Peoples			
6.1 (and all sub-conditions 6.1.1 to 6.1.4)	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and Health Canada and any other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of changes to the quality of air, water and country foods on the health of Indigenous Peoples, taking into account available traditional knowledge provided by Indigenous groups related to current use of lands and resources for traditional purposes. The Proponent shall implement the follow-up program during all phases of the Designated Project. As part of the implementation of the follow-up program, the Proponent shall: • 6.1.1 – identify the fish species used by Indigenous groups for fish tissue sampling and the surface waters locations used by Indigenous groups where water quality testing and fish tissue sampling will occur; • 6.1.2 – monitor methylmercury, chromium and arsenic in surface water and fish tissue of species identified in 6.1.1 in locations determined pursuant to condition 6.1.1; • 6.1.3 – monitor ambient air concentrations of contaminants of concern, as described in section 5.9 of the EIS, taking into account the standards and criteria set out in the Canadian Council of Ministers of the Environment's Canadian Ambient Air Quality Standards and Newfoundland and Labrador's Air Pollution Control Regulations; and • 6.1.4 – identify additional country foods beyond fish that are being harvested within areas where Designated Project-related contamination of these country foods may occur, as indicated by available traditional knowledge and monitor for contaminants of concern in these country foods at locations identified in consultation with Indigenous groups.	Follow-up programs to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of Project-related changes to the quality of air, water and country foods on the health of Indigenous Peoples, were developed in consultation with Indigenous groups, Department of Fisheries and Oceans Canada, Environment and Climate Change Canada, and other relevant authorities. The follow-up program will be implemented and reported on during all Project phases, in accordance with the applicable EA conditions from Section 2 (General Conditions) and Marathon will continue to engage with each Indigenous group over the life of the follow-up program. Refer to section 6.0, section 6.4, and Appendix B of the Annual Report.	Initiated prior to construction and continuing on for the duration of the follow-up program until completion of the program.

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
7 Current Use of Lands and Resources for Traditional Purposes			
7.1 (and all sub-conditions 7.1.1 to 7.1.4)	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a communication plan to share information with Indigenous groups on the adverse environmental effects of Designated Project activities as they relate to the current use of lands and resources for traditional purposes. The Proponent shall implement and maintain the communication plan during all phases of the Designated Project. The communication plan shall include: • 7.1.1 – identification of Designated Project activities that may affect the quality of experience of Indigenous uses of lands and resources for traditional purposes, including hunting, trapping, fishing and/or gathering; • 7.1.2 – procedures, including timing and methods, for sharing information on the following: • 7.1.3 – the location and timing of Designated Project activities identified pursuant to condition 7.1.1; and • 7.1.4 – the results of the follow-up programs referred to in conditions 3.17, 3.18, 4.8, 4.9 and 6.1, and the modified or additional mitigation measures developed and implemented by the Proponent pursuant to condition 2.6 for each follow-up program.	Marathon engaged, and will continue to engage, with both MFN and QFN respecting the potential adverse effects of the Project upon the current use of lands and resources for traditional purposes, including the funding of traditional knowledge/traditional land use studies by each Indigenous group. The communication plan, which was developed in consultation with each Indigenous group, is intended to formalize a process to inform Indigenous groups about Project-related activities that may affect opportunities for, or the quality of experience related to, the harvesting of plants, fish and game, including access, and will be implemented during all Project phases. The plan builds upon existing Indigenous engagement strategies and includes the following components: • Purpose and scope of communication plan; • Roles and responsibilities of each party to the communication plan; • Procedures for information-sharing in relation to the matters identified in conditions 7.1.1., 7.1.3 and 7.1.4, including the method, timing and frequency of communications; • Identification of recipients of shared information and contact information; • Procedures to enable Indigenous persons to express concerns and identify issues relating to the current use of land and resources for traditional purposes, including the form, method and timelines for the transmission of such information by Indigenous groups to Marathon; • Procedures to prescribe the communication of Marathon's response to Indigenous concerns, including through the implementation of additional or modified mitigation measures and the form, method and timelines for the transmission of such information by Marathon to the Indigenous groups; • Use of the Project website, social media and print media; • Documentation and maintenance of records; • Periodic consolidation and reporting of communications to Indigenous groups, including through annual community meetings to provide Project; update and report on compliance with conditions; and • Procedures for updating the Indigenous communication plan as required.	Initiated June 2022 and continuing through rehabilitation and closure.
7.2	The Proponent shall develop, as part of the communication plan referred to in condition 7.1 and in consultation with Indigenous groups, procedures for Indigenous groups to communicate to the Proponent their concerns or views about adverse environmental effects caused by the Designated Project related to the current use of lands and resources for traditional purposes, including issues of access, and procedures for the Proponent to document and respond in a timely manner to the concerns received and demonstrate how issues have been addressed, including through the implementation of additional or modified mitigation measures. The Proponent shall implement these procedures during all phases of the Designated Project.	As noted in the commentary to condition 7.1, the communication plan was developed in consultation with Indigenous groups pursuant to condition 7.1 and describes the methods by which Indigenous groups can provide feedback to Marathon respecting the effects of the Project upon the current use of land and resources for traditional purposes as well as the process by which Marathon will share information and respond to this feedback. All feedback received from Indigenous groups and Marathon's response to feedback is documented and recorded, and shared with Indigenous groups in accordance with the terms of the communication plan. All feedback received during the reporting year and how Marathon has addressed feedback is provided to the Agency as part of the annual report referred to in condition 2.10, including information relating to any additional or modified mitigation measures that Marathon has implemented or plans to implement, or a rationale as to why no additional or modified mitigation measure is required to address the feedback. Refer to section 7.4 of the Annual Report.	Start June 2022 and continuing through rehabilitation and closure.
7.3	The Proponent shall develop, prior to construction and in consultation with Indigenous groups, cultural awareness training for all employees and contractors associated with the Designated Project. The Proponent shall implement the training prior to the start of construction and during all phases of the Designated Project.	In addition to Condition 7.3, Marathon has committed to providing mandatory cultural awareness and cultural sensitivity to all employees and contractors as part of the Benefits Agreement concluded with the Province of Newfoundland and Labrador. Pursuant to this commitment, Marathon engaged in discussions with both QFN and MFN respecting cultural awareness resources and included a commitment to work with each group to develop and deliver appropriate training programs for employees and contractors as part of the Socio-Economic Agreements (SEA) concluded with QFN and MFN. MFN advised that it was in the process of developing training materials and expressed interest in working with Marathon to explore future opportunities pertaining to cultural awareness training. QFN had developed cultural awareness training materials which introduced the legal status, history, and linguistic, cultural, spiritual, and socio-economic conditions of the Mi'kmaq peoples. Marathon and QFN have worked cooperatively and diligently to implement this training for all existing and future project employees and contractors. Refer to section 5.4.3 of the Annual Report.	Continuing on for the life of the Project.
8 Physical and Cultural Heritage and Structures, Sites or Things of Historical, Archaeological, Paleontological or Architectural Significance			

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
8.1 (and all sub-conditions 8.1.1 to 8.1.5)	For any previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance discovered within the Designated Project area by the Proponent or brought to the attention of the Proponent by an Indigenous group or another party during any phase of the Designated Project, the Proponent shall: • 8.1.1 - immediately halt work at the location of the discovery, except for actions required to be undertaken to protect the integrity of the discovery; • 8.1.2 - delineate an area of at least 30 meters around the discovery as a no-work zone; • 8.1.3 - inform the Agency and Indigenous groups within 24 hours of the discovery, and allow Indigenous groups to monitor archaeological works; • 8.1.4 - have a qualified individual, whose expertise pertains to the requirements of Newfoundland and Labrador's *Historic Resources Act* , conduct an assessment of the discovery at the location of the discovery; and • 8.1.5 - consult with Indigenous groups and relevant authorities on the manner by which to comply with all applicable legislative or legal requirements and protocols respecting the discovery, recording, transferring and safekeeping of previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance.	No unidentified structure, site or thing of historical, archaeological, paleontological or architectural significance was discovered within the Project area by Marathon, nor brought to Marathon's attention by an Indigenous group or another party, during 2023. Should this occur, during any Project phase, Marathon will immediately halt work at the location of the discovery and will follow the steps as specified in sub-conditions 8.1.1 to 8.1.5. Refer to section 5.4.4 of the Annual Report.	Initiated at the start of construction and continuing on over the life of the Project.

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
8.2	The Proponent shall require all employees and contractors associated with the Designated Project to undertake, before they conduct any construction activity within the Designated Project area, an awareness training program about the procedures related to the discovery and protection of structures, sites or things of historical, archaeological, paleontological or architectural significance referred to in condition 8.1. The proponent shall develop the awareness training program in consultation with Indigenous groups.	All employees and contractors are required to undertake an environmental orientation prior to conducting any work at site. The orientation includes awareness training about the procedures related to the discovery and protection of structures, sites or things of historical, archaeological, paleontological or architectural significance. Through continuing engagement with QFN and MFN, Marathon is aware of the importance of protecting structures, sites and things of historical, archaeologicals, paleontological and architectural significance, and will continue to work with each group in enhacing the awareness training program. Refer to sections 5.4.3 and 5.4.4 of the Annual Report.	Initiated at the start of construction and continuing on over the life of the Project.
9 Species at Risk			
9.1	The Proponent shall identify, prior to construction and in consultation with relevant authorities, time periods during which Designated Project activities that may adversely impact woodland caribou (*Rangifer tarandus* caribou) must be carried out in order to protect the species.	Marathon has been conducting baseline caribou monitoring since 2019, including collaring and tracking, camera traps, and post-calving surveys, and visual observations. Based on this data and historical data provided by the NLDFFA – Wildlife Division, time periods have been identified during which Project Activities may adversely impact caribou. These time periods are identified in the Caribou Protection and Environmental Effects Monitoring Plan (CPEEMP), as well as mitigation measures implemented to protect caribou and reduce potential effects. The CPEEMP was developed in consultation with the NLDFFA – Wildlife Division, Indigenous groups and the NL Outfitters Association. Refer to section 7.5 of the Annual Report.	Completed.
9.2	The proponent shall conduct the activities that may adversely impact woodland caribou (*Rangifer tarandus* caribou) during the time periods identified pursuant to condition 9.1, unless not technically feasible.	Activities that may adversely impact caribou are being conducted during the time periods identified pursuant to condition 9.1 where technically feasible, and avoiding certain activities / locations during sensitive timing windows (e.g., spring and fall migration). Marathon shall continue to conduct activities during the time periods identified in condition 9.1, unless not technically feasible. As the time periods during which Project activities that may adversely impact caribou vary seasonally and annually, Marathon will consult with relevant authorities where activities that must be carried out during the time periods identified in condition 9.1 may require modification. Refer to section 7.5 of the Annual Report for information regarding migration-specific plans, timing of 2023 migration, and associated mitigation measures.	Initiated prior to construction and continuing on over the life of the Project.
9.3	The Proponent shall, during all phases of the Designated Project in consultation with Environment and Climate Change Canada and other relevant authorities, mitigate adverse environmental effects on woodland caribou (*Rangifer tarandus* caribou) and its habitat, including by carrying out Designated project activities during time periods referred to in condition 9.2 for woodland caribou (*Rangifer tarandus* caribou). In doing so, the Proponent shall give preference to avoiding the destruction or alteration of habitat over minimizing the destruction or alteration of habitat, to minimizing the destruction or alteration of habitat over restoring altered or destroyed habitat on-site, and to restoring altered or destroyed habitat on-site over offsetting.	The mitigations developed during the EA process and CPEEMP, and which will be employed during all phases of the Project to reduce adverse effects on caribou, are based on the mitigation hierarchy of 1) avoid; 2) minimize; 3) restore; and 4) offset. The same mitigation hierarchy will also be employed where/if adaptive management measures are required based on follow-up monitoring results, in consultation with Environment and Climate Change Canada, the NLDFFA – Wildlife Division, and other relevant authorities. Refer to section 7.5 of the Annual Report.	Initiated prior to construction and continuing on over the life of the Project.
9.4	The Proponent shall, during all phases of the Designated Project in consultation with Environment and Climate Change Canada and other relevant authorities, mitigate adverse environmental effects on American marten (*Martes americana*) and its habitat. In doing so, the Proponent shall give preference to avoiding the destruction or alteration of habitat over minimizing the destruction or alteration of habitat, to minimizing the destruction or alteration of habitat over restoring altered or destroyed habitat on-site, and to restoring altered or destroyed habitat on-site over offsetting.	The mitigations developed during the EA process, and which will be employed during all phases of the Project to reduce adverse effects on American marten, are based on the mitigation hierarchy of 1) avoid; 2) minimize; 3) restore; and 4) offset. The same mitigation hierarchy will also be employed where/if adaptive management measures are required based on follow-up monitoring results, in consultation with Environment and Climate Change Canada, the NLDFFA – Wildlife Division, and other relevant authorities.	Initiated prior to construction and continuing on over the life of the Project.
10 Accidents and Malfunctions			
10.1 (and sub-condition 10.1.1)	The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects and mitigate any adverse environmental effects from accidents and malfunctions that occur. In doing so the Proponent shall: • 10.1.1 - design, construct and operate the tailings management facility dams taking into account the Canadian Dam Association's *Dam Safety Guidelines* and the Mining Association of Canada's *Guide to the Management of Tailings Facilities* .	Proper design, construction and operation of Project components are the key factors in preventing accidents and malfunctions. The planning and design for the tailings management facility has been completed by an expert 3rd party and independently peer-reviewed, and an Independent Tailings Review Board was established in 2021. Marathon is committed to following the Canadian Dam Association's Dam Safety Guidelines and the Mining Association of Canada's Guide to the Management of Tailings Facilities over the life of the Project, including closure and post-closure phases.	Initiated prior to construction and continuing on over the life of the Project.

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
10.2	The Proponent shall consult with Indigenous groups and relevant authorities, prior to construction, on the measures to be implemented to prevent accidents and malfunctions referred to in condition 10.1 and provide these measures to the Agency prior to implementing them.	The measures to be implemented to prevent accidents and malfunctions referred to in condition 10.1 were incorporated into the Accidents and Malfunctions Prevention and Response Plan (see condition 10.3 below). Marathon consulted with Indigenous groups and relevant authorities on the measures to prevent accidents and malfunctions, and the plan was provided to the Agency on September 22, 2022. Refer to section 7.6 of the Annual Report.	Completed.
10.3 (and all sub-conditions 10.3.1 to 10.3.2)	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, an accidents and malfunctions response plan in relation to the Designated Project. The accidents and malfunctions plan shall include: • 10.3.1 - a description of the types of accidents and malfunctions that may cause adverse environmental effects during any phase of the Designated Project, including spills, fires, explosions and accidental releases from the tailings management facility; and • 10.3.2 - the measures to be implemented in response to each type of accident and malfunction referred to in condition 10.3.1 to mitigate any adverse environmental effect caused by the accident or malfunction, including: • 10.3.2.1 - measures to conduct water and fish tissue monitoring following an accidental release from the tailings management facility into water; and • 10.3.2.2 - measures to advise the public if results of the monitoring referred to in 10.3.2.1 demonstrate that fish and/or water is not suitable for human consumption.	Marathon's Accidents and Malfunctions Prevention and Response Plan was finalized prior to implementation and in consultation with Indigenous groups and relevant authorities, and addresses all pertinent information per conditions 10.1, 10.3, 10.5 and 10.6. Refer to Annual Report section 7.6 and Appendix B.	Completed.
10.4	The Proponent shall maintain up-to-date the accidents and malfunctions response plan referred to in condition 10.3 during all phases of the Designated Project. The Proponent shall submit any updated accidents and malfunctions response plan to the Agency, Indigenous groups and relevant authorities involved in its implementation within 30 days of the plan being updated.	The Accidents and Malfunctions Prevention and Response Plan will be maintained and updated as required during all Project phases. The plan will be updated if procedures are identified that require amendments or changes based on regulatory changes, procedural changes, or personnel changes that necessitate updates. Marathon will submit any updated accidents and malfunctions plan to the Agency, Indigenous groups and relevant authorities involved in its implementation within 30 days of the plan being updated. Refer to section 7.6 of the Annual Report.	Initiated prior to construction and continuing on over the life of the Project as applicable.

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
10.5 (and all sub-conditions 10.5.1 to 10.5.5)	In the event of an accident or malfunction with the potential to cause adverse environmental effects, including an accident or a malfunction referred to in condition 10.3.1, the Proponent shall immediately implement the measures appropriate to the accident or malfunction, including any measure referred to in condition 10.3.2, and shall: • 10.5.1 - implement the communication plan referred to in condition 10.6; • 10.5.2 - notify relevant authorities with responsibilities related to emergency response (including environmental emergencies) in accordance with applicable legislative and regulatory requirements; • 10.5.3 - notify, as soon as possible and pursuant to the communication plan referred to in condition 10.6, Indigenous groups of the accident or malfunction, and notify the Agency in writing no later than 24 hours following the accident or malfunction. When notifying Indigenous groups and the Agency, the Proponent shall specify: • 10.5.3.1 - the date and time when and location where the accident or malfunction occurred within the Designated Project area; • 10.5.3.2 - a summary description of the accident or malfunction; • 10.5.3.3 - a list of any substance potentially released into the environment as a result of the accident or malfunction; • 10.5.4 - submit a written report to the Agency no later than 30 days after the day on which the accident or malfunction occurred. The written report shall include: • 10.5.4.1 - a detailed description of the accident or malfunction and of its adverse environmental effects; • 10.5.4.2 - a description of the measures that were taken by the Proponent to mitigate the adverse environmental effects caused by the accident or malfunction; • 10.5.4.3 - any view from Indigenous groups and advice from relevant authorities received with respect to the accident or malfunction, its adverse environmental effects and the measures taken by the Proponent to mitigate these adverse environmental effects; • 10.5.4.4 - a description of any residual adverse environmental effect and any modified or additional measure required by the Proponent to mitigate residual adverse environmental effects; and • 10.5.4.5 - details concerning the implementation of the accident or malfunction response plan referred to in condition 10.3. • 10.5.5 - submit a written report to the Agency no later than 90 days after the day on which the accident or malfunction occurred that includes: • 10.5.5.1 - a description of the changes made to avoid a subsequent occurrence of the accident or malfunction; • 10.5.5.2 - the modified or additional measure(s) implemented by the Proponent to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation, taking into account the information submitted in the written report pursuant to condition 10.5.3; and • 10.5.5.3 - all additional views from Indigenous groups and advice from relevant authorities received by the Proponent since the views and advice referred to in condition 10.5.3.3 were received by the Proponent.	Marathon's Accidents and Malfunctions Prevention and Response Plan addresses all pertinent information required by conditions 10.1, 10.3, 10.5 and 10.6. The plan provides guidance to all personnel on the collection and communication of critical information necessary to respond to the accident or malfunction, notification of and communication with Indigenous groups as required by the communication plan referenced in condition 10.6, the Agency and any other relevant authorities, and reporting requirements, including the report referenced in condition 10.5.5. Refer to EA Report section 7.6 and Appendix B.	Initiated prior to construction and continuing on over the life of the Project, as applicable.
10.6 (and all sub-conditions 10.6.1 to 10.6.3)	The Proponent shall develop, in consultation with Indigenous groups, a communication plan for Designated Project accidents and malfunctions. The Proponent shall develop the communication plan prior to construction and shall implement and keep it up to date during all phases of the Designated Project. The plan shall include: • 10.6.1 - the types of accidents and malfunctions requiring the Proponent to notify the Indigenous groups; • 10.6.2 - the manner by which Indigenous groups shall be notified by the Proponent of an accident or malfunction and of any opportunity for the Indigenous groups to assist in the response to the accident or malfunction; and • 10.6.3 - the names and contact information of the Proponent and Indigenous group representatives for the purposes of notifying pursuant to condition 10.6.2 and communicating about accidents and malfunctions.	Marathon developed a communication plan for accidents and malfunctions, as a component of the Accidents and Malfunctions Prevention and Response Plan, in consultation with MFN and QFN. The communication plan has been implemented and will be updated throughout the phases of the Project, as applicable, including the following components: • A process, including criteria, for the identification of the types of accidents and malfunctions which will be the subject of notification to Indigenous groups; • Reporting process, including method, format, content and timing of Marathon's notification to Indigenous groups; • Identification and contact information of the Marathon and Indigenous group representatives for purposes of notification and communication; and • Procedures for updating the plan. Refer to section 7.5 and Appendix B of the Annual Report.	Initiated prior to construction and continuing on over the life of the Project as applicable.
11 Schedules			
11.1	The Proponent shall submit to the Agency and Indigenous groups a schedule for all conditions set out in this Decision Statement no later than 30 days prior to the start of construction. This schedule shall detail all activities planned to fulfill each condition set out in this Decision Statement and the commencement and estimated completion month(s) and year(s) for each of these activities.	The report presenting the schedule for all conditions was submitted to the Agency and Indigenous groups in August 2022, earlier than required 30 days in advance of the planned construction start date. It detailed all activities planned to fulfill each condition, with commencement and estimated completion months and years for each activity.	Completed.

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
11.2	The Proponent shall submit to the Agency and Indigenous groups a schedule outlining all activities required to carry out all phases of the Designated Project no later than 30 days prior to the start of construction. The schedule shall indicate the commencement and estimated completion month(s) and year(s) and duration of each of these activities.	A schedule outlining all activities required to carry out all phases of the Designated Project was prepared and submitted to the Agency and Indigenous groups in August 2022, earlier than the required 30 days in advance of the planned construction start date. The level of detail and timing for the implementation of specific activities were provided to the extent possible.	Completed.
11.3	The Proponent shall submit to the Agency and Indigenous groups in writing an update to schedules referred to in conditions 11.1 and 11.2 every year no later than March 31, until completion of all activities referred to in each schedule.	Updated schedules referred to in conditions 11.1 and 11.2 were included in the 2022 Annual Report, submitted to the Agency and Indigenous groups in March 2023. For the 2023 Annual Report, this table itself represents the updated schedule required by condition 11.1. With regards to condition 11.2, the LOM Development schedule has remain unchanged from that provided prior to construction; however, the construction activities schedule has been updated and is attached as Appendix C. Updates will continue to be submitted to the Agency and Indigenous groups each year, no later than March 31, until all activities referred to in each schedule are complete. Refer to Appendix C for the updated Project schedule.	March 31, 2023 and March 31 every subsequent year, until completion of all activities referred to in each schedule.

Condition Number	Condition	Condition Implementation Activities Undertaken / Planned	Schedule for Implementation
12 Recordkeeping			
12.1	The Proponent shall maintain all records relevant to the implementation of the conditions set out in this Decision Statement. The Proponent shall retain the records and make them available to the Agency 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 Proponent shall provide the aforementioned records to the Agency upon demand within a timeframe specified by the Agency.	Records relevant to the implementation of the conditions will be maintained and retained for 25 years following the end of operation, or until the end of decommissioning of the Project, as required. Records will be provided to the Agency upon request.	Ongoing, to continue for 25 years following end of operation or until end of decommissioning.
12.2	The Proponent shall retain all records referred to in condition 12.1 at a facility in Canada and shall provide the address of the facility to the Agency. The Proponent shall notify the Agency at least 30 days prior to any change to the physical location of the facility where the records are retained, and shall provide to the Agency the address of the new location.	All records referred to in condition 12.1 will be retained in Canada at Marathon's corporate office: 36 Lombard Street Suite 600 Toronto, ON M5C 2X3 Marathon will notify the Agency if there is a change to the physical location of the facility retaining the records at least 30 days prior to any change, and the new address will be provided to the Agency.	Ongoing, to continue for 25 years following end of operation or until end of decommissioning.
12.3	The Proponent shall notify the Agency of any change to the contact information of the Proponent.	The Agency will be notified if there is a change to the contact information of the Proponent. No changes are anticipated at this time.	Ongoing, as applicable.

Table B.1 MFN Comments

Topic	Comment	Response
Caribou Deflection and Exacerbation of Significant Impacts	The Project Change EIS addendum (Communication tower) does not adequately address potential exacerbation of effective habitat loss and deflection for caribou. The description of the proposed tower as “at a distance from the primary migration route” does not provide enough detail to fully understand potential effects. Especially since the EIS acknowledges that the primary migration route will already be significantly and negatively disrupted by the proposed project. The Buchans herd is reasonably expected to seek alternate movement corridors to avoid mining activities. As such, adding the communications tower may further reduce migration options or induce additional caribou deflection from the area. At approximately 138m, this tower would become the tallest structure on the landscape. The Project Change EIS addendum should describe the distance at which this tower will be visible. It should present detailed information about how the proposed tower may impact existing, and potential future, migration options for the Buchans herd. Furthermore, the addendum should propose monitoring and adaptive management approaches, which endeavor to minimize caribou deflection and effective habitat loss from this visually significant structure.	The proposed communications tower will be located 3.2 km west of the Buchans caribou herd primary spring and fall migration corridor (see Section 11, Figure 11-12, Figure 11-13 in the EIS). The tower will be located within the mine site (i.e., within the Project Area as assessed in the EIS). As indicated in the EIS, caribou are expected to reduce their use of this migratory corridor or avoid the mine site during construction and operation due to potential sensory disturbance (e.g., noise, lights) associated with mining activities (e.g., blasting, excavation, hauling rock) and Project infrastructure, which will likely result in caribou using alternate migration pathways. Isolating the potential effects of the communications tower on caribou movement from other mining infrastructure is not practical due to potentially confounding sources of disturbance during construction and operation. The dynamic Brownian bridge movement model (dBBMM) identified a network of relatively lower use areas within a larger migration corridor, and the least-cost path (LCP) analysis undertaken for the Project described the energetic costs of using potential alternate seasonal migration routes. Although there is some uncertainty regarding how caribou will respond to mining activities and infrastructure during construction and operation, it is expected that these alternate routes (i.e., migration options) or surrounding areas will receive increased use during spring and fall migrations. Given the location of the communications tower within the mine site, it is unlikely to affect use of these migration options. A visibility assessment to determine the distance at which the communications tower would be visible to a migrating caribou is not practical due to the distance from the tower to the primary migration route (3.2 km) and because it is not known how caribou would use their visual abilities to perceive and/or respond to a communications tower during migration (i.e., see the local environment from their perspective at different distances, with dense vegetation and variable terrain). Furthermore, as mentioned above, the effects of the communications tower would be confounded with the effects of other mining activities because of its location. Marathon has developed a CPEEMP that is designed to monitor caribou seasonal movements relative to mine infrastructure and activities and respond to issues that might arise related to caribou movement within an adaptive management framework. As part of the Project infrastructure, construction and operation of the communications tower would be captured within the CPEEMP. Overall, the potential effect of the communications tower on caribou is not expected to result in incremental effects on caribou seasonal movement because the primary source of sensory disturbance will be associated with mining activities and associated infrastructure, which have already been assessed in the EIS (see Section 11.5.2). As such, the installation and operation of the communications tower will not change the characterization of predicted residual effects on caribou movement discussed in the EIS. No additional mitigation measures are required, beyond those mitigation measures previously identified in the EIS and CPEEMP.

Topic	Comment	Response
Enjoyment of the Land	As noted above, the tower will be the tallest structure visible on the landscape near the Project. This may alter the enjoyment of MFN community members who hunt, fish, or travel in the area. In particular, the lighting at night will dramatically alter the night sky for members who are staying out on the land overnight. Other potential changes include “whistling” or “singing” guy-wires, which is caused by wind-induced vibrations. MFN requests that Marathon provide additional information on these potential impacts and describe any associated mitigation measures.	The EIS assumed that access to the mine site would be restricted, and this area would not be available for land and resource use other than mining activity. As the communications tower will be located within the boundaries of the mine site, the effect of the tower on land use availability has already been accounted for in the EIS. . With respect to potential sensory disturbance, the communications tower, which is 138 m in height and is located at 406 m above sea level (ASL) will be the tallest structure associated with the Project (the top of the high-grade ore stockpile with a height of 440 m ASL was the tallest component of the Project assessed in the EIS). As such, the tower will be visible on the landscape beyond the mine site. With respect to lighting, the tower will need to comply with Transport Canada’s requirements, but no additional lighting above these requirements is planned. The tower will be dismantled and removed at the end of the mine life, removing the visual disturbance at that time. The EIS identified that the viewscape can be altered by physical features or works associated with the Project that are visible from outside the Project Area, potentially resulting in an indirect effect on cultural and spiritual sites and areas used for resource and recreational activities. The EIS also indicated that as there are low levels of current use by Indigenous Groups identified within the Local Assessment Area, residual effects are anticipated to be low; however, they will occur over the long-term throughout the life of the Project. This assessment is still considered valid. Marathon is committed to on-going engagement and communication with the MFN and QFN. To support ongoing engagement, Marathon has developed a Current Use of Lands and Resources for Traditional Purposes Indigenous Communications Plan (the Plan). Marathon has also concluded a SEA with QFN and is currently negotiating an SEA with MFN. The Plan and SEAs provide an ongoing forum for the discussion of issues associated with the Project and its potential impacts upon Indigenous land and resource use and other issues.

Topic	Comment	Response
Bird and Bat Collisions	Communication towers are known to cause large numbers of casualties for birds and bats (Manville, 2016; Longcore *et al*., 2008). One guy-wired, 305 m tower in Wisconsin is documented (based on detections and therefore a likely underestimate) to have killed an average of 3,500 birds per year over a 38-year period (Longcore *et al*. 2008). With its proposed position between two arms of the Victoria Lake Reservoir (~700 m distance) and Valentine Lake (~2,700 m distance), as well as adjacent wetlands and ponds (~250 m), this tower poses a threat to waterfowl, raptors, songbirds, bats and other flying species. It also increases the likelihood of collisions for local resident birds during the breeding season and migrating birds during spring and autumn peak periods. Bats, including endangered Myotis spp, using adjacent high suitability wetland, lake and forest habitats, are at risk of collision with this structure. In the context of the massive North American die-off of bats due to White Nose Syndrome, coupled with naturally slow reproductive rates, every incident of bat collision mortality constitutes a significant impact (Manville, 2015). More information about best-practices to reduce bat mortality should be presented in the Project Change EIS addendum. Eighty percent of North American non-sedentary bird species migrate at night (Manville, 2015). Marathon Gold's proposed use of flashing light – which has been shown to reduce mortality compared to fixed (Gehring *et al*., 2009; Longcore *et al*., 2008) – is acknowledged as a positive mitigation approach. However, due to the height of the tower, with its associated guy-wire heights and angles, this proposed tower poses a significant threat to migrating birds, especially nocturnal migrants (Gehring *et al*., 2011, Manville, 2015). State of the art best practices should be employed to minimize this risk. The Project Change EIS addendum should present guy-wire collision mitigation techniques and propose improvements to reduce this significant impact. Flashing lights (in conjunction with diverters; discussed below) are likely necessary along the guy-wires to adequately mitigate nocturnal collisions. Bird diverter devices, installed along guy-wires, have been shown to reduce bird mortality for some species (Manville, 2016). These devices may also reduce impacts to bats by enhancing echolocation detectability of the wires (however research on this topic is limited). Bird diverter devices should be included in the memorandum and added to the proposed communications tower. Furthermore, a detailed, descriptive table of mitigations related to the avoidance of bird and bat collisions with the tower and its guy-wires should be presented. Lastly, as the majority of bird and bat collision mortalities occur at night, and most of the species are small-bodied, this impact is easily over-looked. To ensure the effectiveness of mitigations, and enable adaptive management response, Marathon Gold should implement a bird and bat mortality monitoring program. This collision mortality monitoring program was requested during an earlier round of comments for all project components, and should also encompass the proposed tower.	Bat collisions with stationary structures appear to be low in comparison to bird collisions (Van Gelder 1956; Orbach and Fenton 2010; Longcore *et al*. 2012). Bat collisions occur more often with lighted structures (Orbach and Fenton 2010). Bird collisions are more well documented and understood (e.g., Longcore *et al*. 2012) and discussed in Section 4 of this report. Flyways for migrating birds and bats in Newfoundland differ from those in central North America, such as the great "Mississippi Flyway", in terms of overall abundance and species diversity. There are four major migration flyways in North America, and the province of Newfoundland and Labrador is within the "Atlantic Flyway" (USFWS n.d.), with the major migration pathways in the flyway in this area focused along coastlines. Relatively fewer birds and bats would use the Project Area as a migratory pathway compared to coastal areas. As such, large mortality events, such as those documented in Longcore *et al*. 2008, would not be expected. Regardless, the following mitigation measures will be implemented to reduce the potential for bird and bat collisions with the communications tower for both migrant and resident species: • Lighting will be limited to Transport Canada's requirements. • When possible, flashing lights will be used as opposed to fixed lighting, while adhering to Transport Canada's requirements. • The minimum number of guy wires necessary will be used (US Fish and Wildlife Service 2021). • Guy wires will have visual markers or bird diverter devices, to reduce bird mortality (US Fish and Wildlife Service 2021; Manville 2016). • Post construction mortality searches as identified in the Avifauna Follow-up Monitoring Program will be expanded to include the communications tower.
Electromagnetic Radiation	Neither the EIS, nor the "Addition of a Communications Tower" addendum, identify electromagnetic radiation as an impact to terrestrial fauna. However, electromagnetic radiation from communication towers is known to impact birds and bats (as well as other mammals and amphibians) in several ways: reduced breeding success, site avoidance (effective habitat loss) and reduction of natural defenses (Balmori, 2008, Everaert & Bauwens, 2007). A study in Spain detected significant diminishment of breeding success in storks within 200 m of a telecommunications tower (Balmori, 2008). In the case of the proposed communication tower, this undescribed impact (electromagnetic radiation) has the potential to create a chronic degradation of wildlife habitat in the vicinity of the tower during its entire operating life. The EIS addendum should address this impact, describe the effective habitat loss, and include approaches to mitigate this impact as much as possible.	The effects of electromagnetic radiation from communications towers on wildlife are not well understood, and it is often difficult to separate the effects of electromagnetic radiation from other confounding variables (e.g., light pollution) (Malkemper *et al*. 2018). However, there is research to indicate that anthropogenic electromagnetic radiation may have adverse effects on wildlife species. Many species of wildlife depend on Earth's electromagnetic fields for biological needs including navigation, circadian rhythms and reproduction (Levitt, Lai and Manville 2022). As such, the introduction of anthropogenic electromagnetic radiation may interfere with these processes. For example, radio frequency may affect magnetic orientation for migratory birds; however, it is not understood if this has real ecological consequences (Malkemper *et al*. 2018). Some studies (e.g., Balmori 2005, Everaert and Bauwens 2007) have indicated that electromagnetic radiation may affect the abundance and/or breeding success of birds. These effects appeared to be localized (e.g., within a 200 m radius of the source [Balmori 2005]), and as such would not be expected to affect birds at a population level. The communications tower is located within the mine site. In the EIS, it was assumed that all habitat within the mine site would be lost or altered. Therefore, the residual effects predictions in the EIS for both avifauna and other wildlife account for this loss/alteration of habitat. As a result, the installation and operation of the communications tower will not change the characterization of predicted residual effects on avifauna and other wildlife as discussed in the EIS. No additional mitigation measures are required.

Topic	Comment	Response
Novel Breeding Habitat	Peregrine falcon (Falco peregrinus) has been recovering in Canada since the DDT-caused decline of the 1950-1980s. Human-made structures, such as the proposed communications tower, offer novel breeding habitat for this cliff-nesting species in areas where they did not breed in the first half of the 20th century (Holroyd & Bird, 2012). The “Addition of a Communications Tower” addendum makes mention of a proposed mitigation response in the event of nesting from osprey (Pandion haliaetus) or bald eagle (Haliaeetus leucocephalus). Although not likely, peregrine falcon nesting is possible, which could alter local trophic interactions and increase predation of landbirds and waterfowl in the vicinity. All raptor nesting should be monitored, reported and responded to.	Peregrine falcons have only been known to breed on the island of Newfoundland in very small numbers (Sullivan *et al.* 2009), and nest on high rock crevices, usually near the ocean or open tundra (COSEWIC 2017). Therefore, it is unlikely that a pair would construct a nest in the Project Area . As such, peregrine falcons are not expected to use the communications tower as a nest site. If a peregrine falcon nest did occur, the same mitigation would be followed as was specified for an osprey nest. Should any raptor nest on the tower, the NL Wildlife Division would be notified, and the nest would be monitored throughout the breeding season. In consultation with the NL Wildlife Division, Marathon would consider the possible relocation of the nest once the breeding season is over. This would require the use of qualified professionals to move the nest during the winter to a safer location beyond the mine site.

Appendix B INDIGENOUS ENGAGEMENT SUMMARY

OVERVIEW

The Decision Statement includes multiple Conditions for which Indigenous consultation and engagement is a requirement. This Appendix provides a summary of the key consultation and engagement activities undertaken with Indigenous groups during the reporting period as required by the relevant Decision Statement Conditions. Additional details are contained in the following sections:

- 5.4.2: Changes to the Designated Project.
- 5.4.3: Cultural Awareness Training.
- 5.4.4: Physical, Cultural Heritage and Structure, Site or Thing of Historical, Archaeological, Paleontological or Architectural Significance.
- 7.4: Current Use of Lands and Resources for Traditional Purposes Indigenous Communications Plan.
- 7.6: Accidents and Malfunctions Prevention and Response Plan.

Additionally, Marathon is committed to implementing initiatives that promote reconciliation. In addition to mandatory cultural awareness training, Marathon has commemorated and will continue to observe Indigenous Peoples Day, the National Day for Truth and Reconciliation, and any other days of special significance to Indigenous peoples. Marathon has also invested in cultural initiatives including the following:

- Financial and in-kind support for QFN's Land-Based Learning Camp Program.
- Sponsorship of Day of Discovery (August 24, 2023), a joint initiative of QFN and the Department of Fisheries and Oceans, the purpose of which is to offer Indigenous youth cultural learning in the Green Bay – Badger Bay area of the province, highlighting wildlife common to the area and historical seasonal settling areas, and also provides awareness of historic, seasonal travel routes.
- Observation of National Indigenous Peoples Day at site and at Toronto and Grand Falls-Windsor offices and participation in Badger-DFO salmon release event to mark the day.
- Observation of National Day for Truth and Reconciliation (September 30, 2023) at the Project site and Toronto and Grand Falls-Windsor offices. In addition, Marathon attended several events to mark National Truth and Reconciliation Day including the QFN/Heritage Canada Truth and Reconciliation Event at Corduroy Brook (September 29) and the Two Sisters/Town of Grand Falls-Windsor "Walk A Lap" for Truth and Reconciliation (September 30).
- Award of five Marathon – QFN scholarships (March 2023).
- Participation in "Elders Day on the Water" event organized by QFN (October 2023). Marathon – MFN SEA commitments to fund an MFN Scholarship Fund and other forms of cultural investment.
- SEA commitments to fund two on-site Indigenous environmental technicians.

A. Schedules

Sections 11.1 and 11.2 of the Conditions require the Proponent to submit to both the Agency and Indigenous groups two schedules: an implementation schedule detailing all activities planned to fulfill each Condition, including a commencement and completion date; and a schedule outlining all activities required to carry out all Phases of the Project, including commencement and completion dates and duration of each activity.

As required by section 11.3 of the Conditions, updates to the schedules referred to in sections 11.1 and 11.2 reflecting activities in 2023 have been provided to MFN and QFN concurrent with transmission to the Agency.

B. Changes to the Designated Project

Section 2.16 of the Federal Decision Statement requires the Proponent to provide advance notice to the Agency of any proposed changes to the Designated Project and Section 2.17 further requires the Proponent to submit to the Agency any additional information required by the Agency about the proposed change(s) referred to in Condition 2.16. Additional information referred to in Section 2.17 may include "the results of consultation with Indigenous groups ...on the proposed change(s)...".

Two changes to the Designated Project have been proposed since the issuance of the Federal Conditions in August, 2022: the proposed Communications Tower and the Berry Project Expansion. Marathon engaged with both QFN and MFN in respect of both proposed changes as described in the following sections.

A draft description of the proposed Communications Tower was provided to MFN and QFN on December 2, 2022 for review and feedback. QFN responded on December 7, 2022 indicating that they had no serious concerns with the proposed change. On December 19, 2022, Marathon received comments from MFN. These comments as well as Marathon's responses were provided in Appendix A to the final Valentine Gold Project: Description of Project Change – Addition of a Communications Tower ((Marathon 2023f) which was transmitted to each Indigenous Group on January 24, 2023. MFN's comments pertaining to the proposed communications tower have been fully considered by Marathon and are summarized in Table B.1: MFN Comments, which follows below.

There was engagement with MFN and QFN respecting the proposed Berry Pit Expansion in 2023. However, the proposed changes associated Berry Project Pit Expansion are subject to the ongoing IAAC review process, and as such, the engagement activities have not been included.

C. Current Use of Lands and Resources for Traditional Purposes Indigenous Communications Plan

As described in section 7.4, as part of the ongoing engagement with Indigenous groups, advance quarterly notices have been provided regarding upcoming project activities in the upcoming quarter, predicted effects and associated mitigations. During 2023, quarterly notices were provided as follows:

- March 11, 2023 – for upcoming activities in Q2, 2023.
- June 21, 2023 – for upcoming activities in Q3, 2023.
- September 15 2023 – for upcoming activities in Q4, 2023.
- December 15, 2023 – for upcoming activities in Q1, 2024.

No issues or concerns were identified by either Indigenous group during the reporting period.

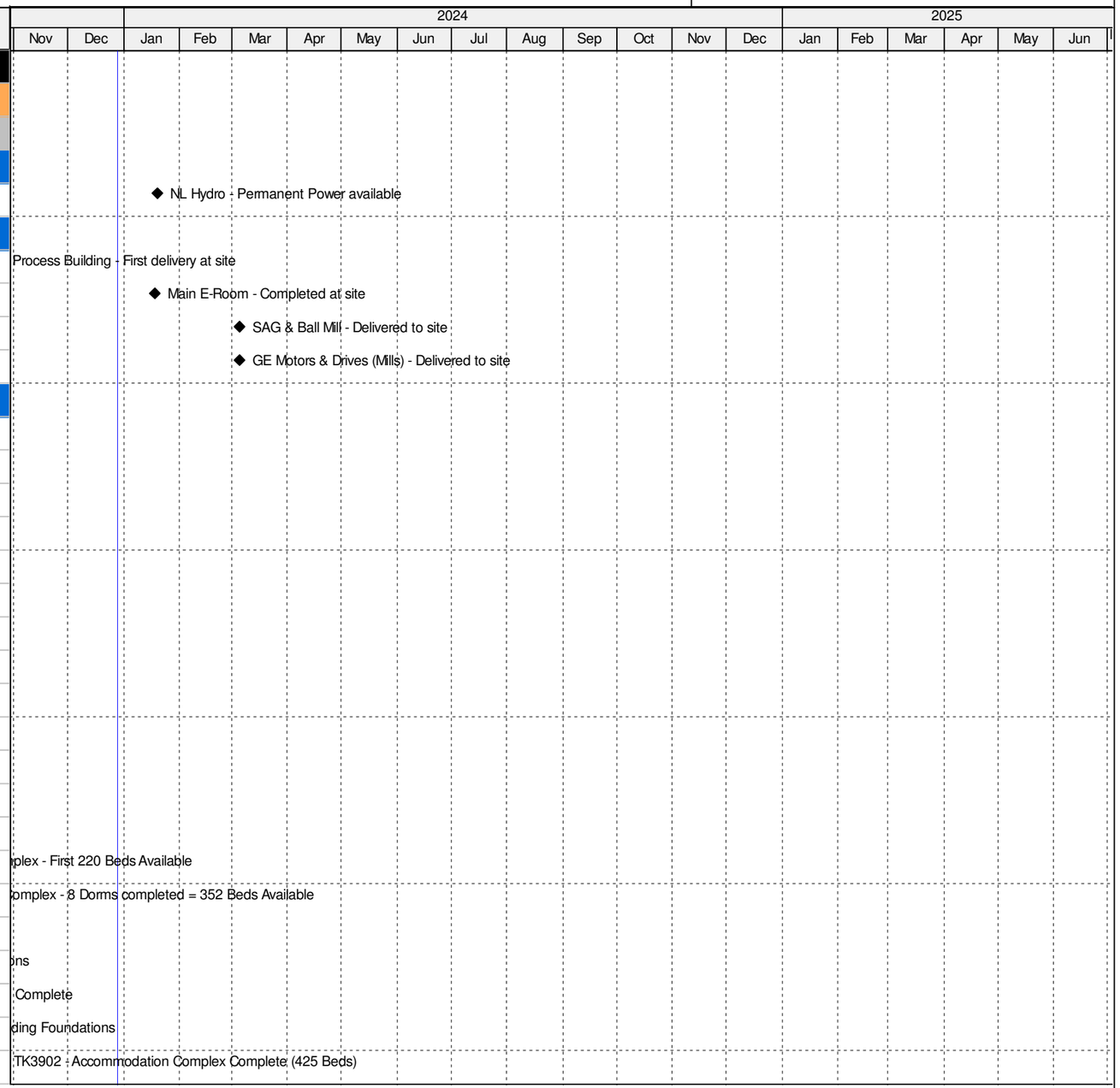
Appendix C CONSTRUCTION SCHEDULE

MARATHON GOLD

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
Valentine Gold Project w - Spring Thaw Scenario		943	07-Aug-21 A	03-May-25
Valentine Gold Project w - Spring Thaw Scenario		943	07-Aug-21 A	03-May-25
Project Milestones		938	16-Aug-21 A	03-May-25
Infrastructure		0	19-Jan-24	19-Jan-24
MP-1910	NL Hydro - Permanent Power available	0		19-Jan-24
Procurement		130	31-Aug-23 A	05-Mar-24
MP-2790	Pre-Engineered Process Building - First delivery at site	0		31-Aug-23 A
MP-2810	Main E-Room - Completed at site	0		18-Jan-24
MP-2800	SAG & Ball Mill - Delivered to site	0		05-Mar-24
MP-2820	GE Motors & Drives (Mills) - Delivered to site	0		05-Mar-24
Construction		811	16-Aug-21 A	06-Nov-24
MP-1960	CC4101 - "Maintenance" works start - Access Road	0	16-Aug-21 A	
MP-1450	Commencement of Temporary Camp Installation	0	25-Jul-22 A	
MP-2090	TK3905 - Temporary Construction Camp complete	0		04-Oct-22 A
MP-1980	CC4103 - Victoria River Bridge works start	0	05-Oct-22 A	
MP-2650	Mobilisation to Site - Construction Start - Early Works	0	05-Oct-22 A	
MP-1970	CC4102 - Upgrade works start - Access Road	0	05-Oct-22 A	
MP-1990	CC0001 - Tree Cutting works - start	0	05-Oct-22 A	
MP-2060	CC3001 - Major Earthwork works start	0	12-Oct-22 A	
MP-2750	Victoria River Bridge replacement complete	0		25-Nov-22 A
MP-1500	Commencement of construction - Execution Phase	0	30-Jan-23 A	
MP-2730	Concrete Batch Plant Setup Complete	0		28-Mar-23 A
4000-CO-1000	Spring Thaw - Modified road access plan	30	18-Apr-23 A	30-May-23 A
MP-2830	Main SwitchYard Pad Complete	0		26-May-23 A
MP-2105	TK3901 / TK3902 - Accommodation Complex - First 220 Beds Available	0		10-Jun-23 A
MP-3000	TK3901 / TK3902 - Accommodation Complex - 8 Dorms completed = 352 Beds Available	0		20-Jun-23 A
MP-2760	Process Plant Pad complete	0		13-Jul-23 A
MP-2860	Start SAG & Ball Mill Foundations	0	15-Jul-23 A	
MP-2870	Main SwitchYard Concrete Complete	0		28-Jul-23 A
MP-2840	Start Pre-Eng Building Foundations	0	25-Aug-23 A	
MP-2110	TK3901 / TK3902 - Accommodation Complex Complete (425 Beds)	0		22-Sep-23 A

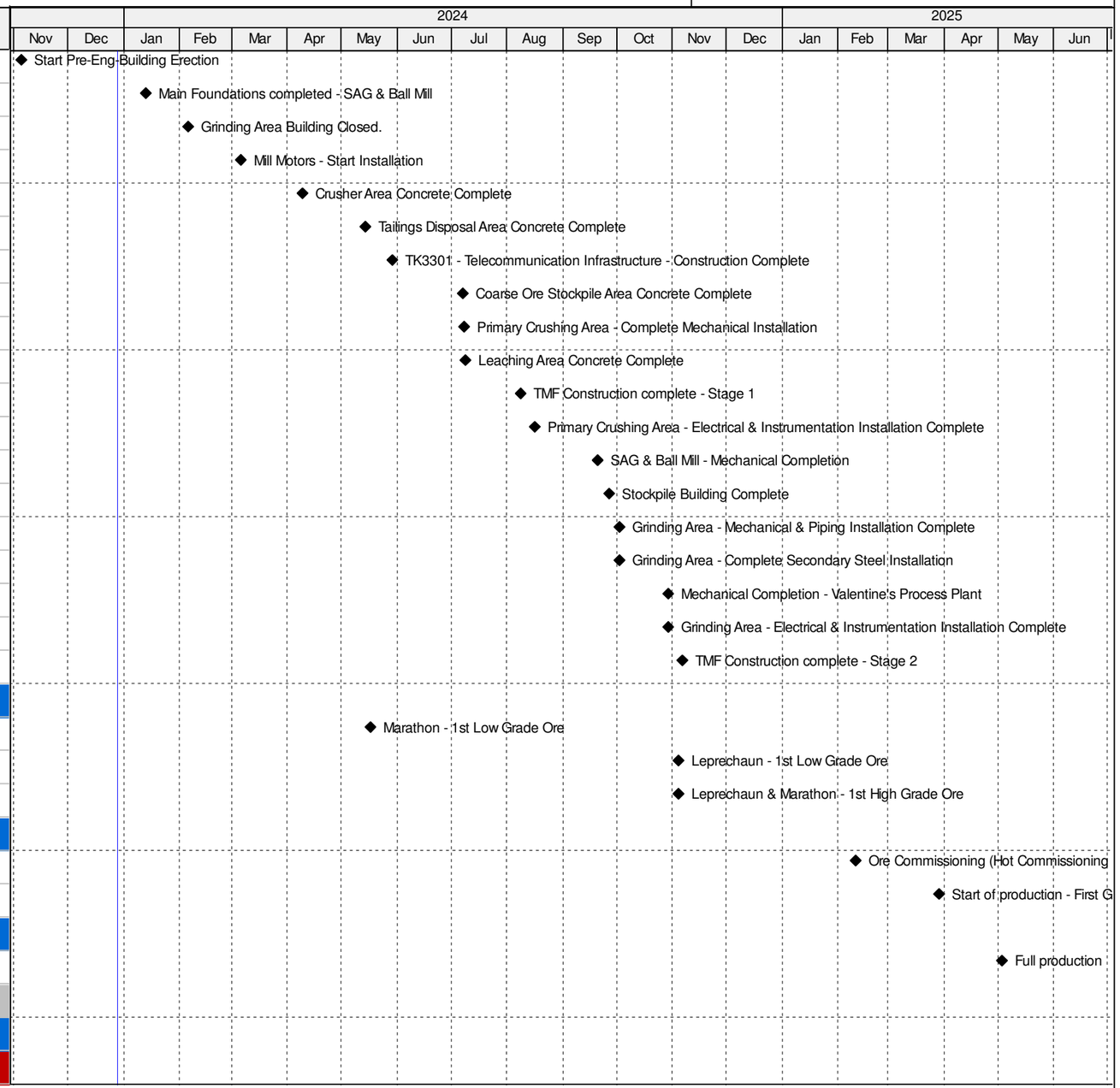


Remaining Level of Effort
Actual Level of Effort
Actual Work
Remaining Work
Critical Remaining Work
Milestone

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
MP-2850	Start Pre-Eng-Building Erection	0	05-Nov-23 A	
MP-2770	Main Foundations completed - SAG & Ball Mill	0		13-Jan-24
MP-2740	Grinding Area Building Closed.	0		05-Feb-24
MP-2950	Mill Motors - Start Installation	0	06-Mar-24	
MP-2890	Crusher Area Concrete Complete	0		09-Apr-24
MP-2910	Tailings Disposal Area Concrete Complete	0		14-May-24
MP-2040	TK3301 - Telecommunication Infrastructure - Construction Complete	0		29-May-24
MP-2900	Coarse Ore Stockpile Area Concrete Complete	0		07-Jul-24
MP-2970	Primary Crushing Area - Complete Mechanical Installation	0		08-Jul-24
MP-2880	Leaching Area Concrete Complete	0		08-Jul-24
MP-2080	TMF Construction complete - Stage 1	0		08-Aug-24
MP-2990	Primary Crushing Area - Electrical & Instrumentation Installation Complete	0		16-Aug-24
MP-2780	SAG & Ball Mill - Mechanical Completion	0		20-Sep-24
MP-2980	Stockpile Building Complete	0		26-Sep-24
MP-2940	Grinding Area - Mechanical & Piping Installation Complete	0		02-Oct-24
MP-2960	Grinding Area - Complete Secondary Steel Installation	0		02-Oct-24
MP-1920	Mechanical Completion - Valentine's Process Plant	0		29-Oct-24
MP-2930	Grinding Area - Electrical & Instrumentation Installation Complete	0		29-Oct-24
MP-2085	TMF Construction complete - Stage 2	0		06-Nov-24
Mining		171	17-May-24	04-Nov-24
MP-2690	Marathon - 1st Low Grade Ore	0	17-May-24	
MP-2670	Leprechaun - 1st Low Grade Ore	0	04-Nov-24*	
MP-2710	Leprechaun & Marathon - 1st High Grade Ore	0	04-Nov-24	
Commissioning		47	10-Feb-25	29-Mar-25
MP-1590	Ore Commissioning (Hot Commissioning Complete)	0		10-Feb-25
MP-1600	Start of production - First Gold	0		29-Mar-25
Start-up and Ramp-up		0	03-May-25	03-May-25
MP-1650	Full production	0		03-May-25
Project Management		31	03-Mar-23 A	28-Mar-23 A
Construction Contracts		31	03-Mar-23 A	28-Mar-23 A
CB2002 - Concrete Batch Plant Contract		31	03-Mar-23 A	28-Mar-23 A



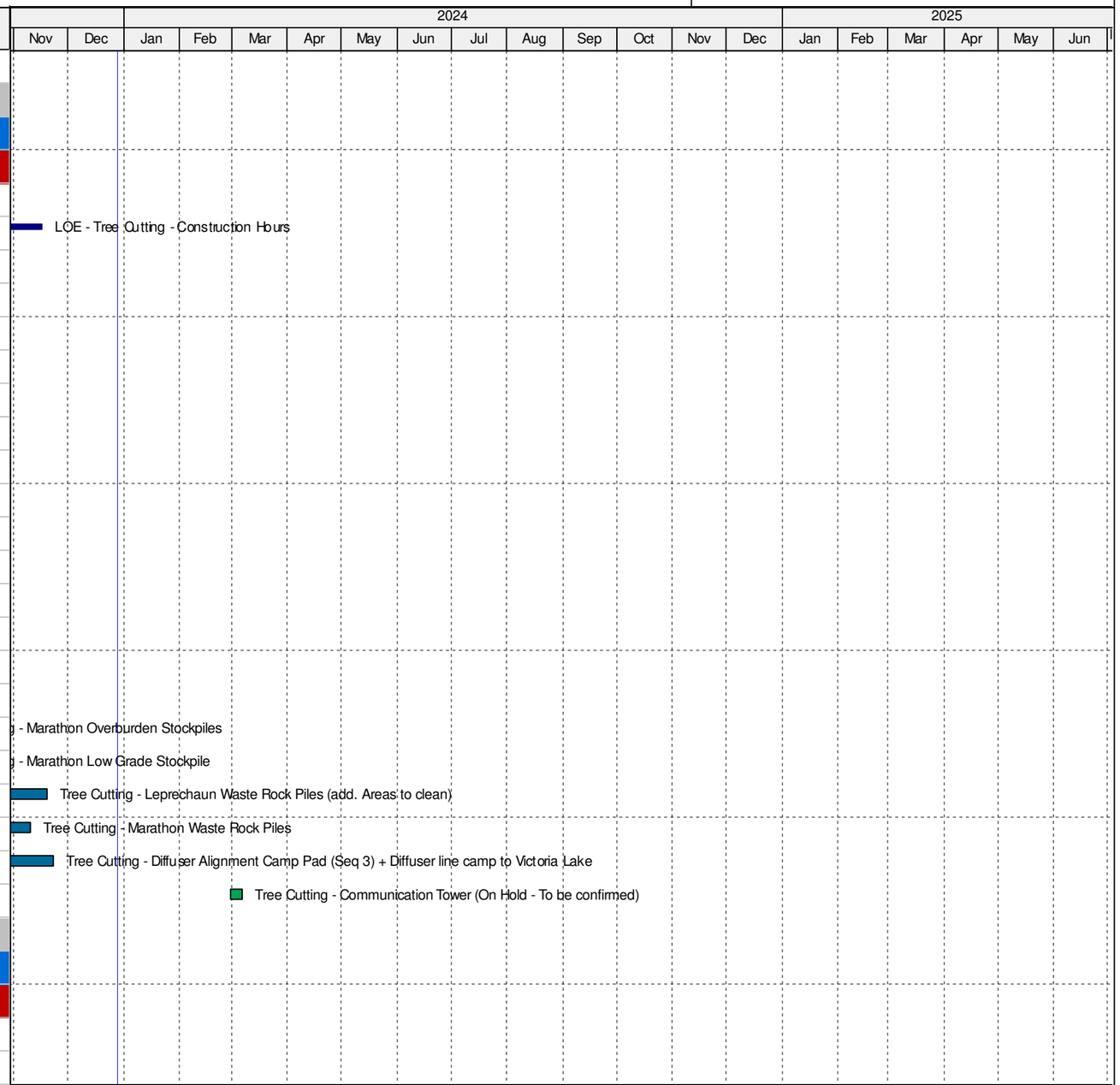
Remaining Level of Effort
Actual Level of Effort
Actual Work
Remaining Work
Critical Remaining Work
Milestone

MARATHON GOLD

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
CB2002-CO-150	Concrete Batch Plant Mobilization & Setup	31	03-Mar-23 A	28-Mar-23 A
0000 - Overall Areas		352	05-Oct-22 A	06-Mar-24
CC0001 - Tree Cutting		352	05-Oct-22 A	06-Mar-24
Construction		352	05-Oct-22 A	06-Mar-24
CC0001-CO-100	Tree Cutting - Mobilization	4	05-Oct-22 A	08-Oct-22 A
CC0001-CO-010	LOE - Tree Cutting - Construction Hours	150	05-Oct-22 A	16-Nov-23 A
CC0001-CO-130	Mulching - Leprechaun Pit (Seq 1)	29	05-Oct-22 A	08-Nov-22 A
CC0001-CO-110	Tree Cutting - Accommodaton Complex pad (Seq 2)	14	05-Oct-22 A	18-Oct-22 A
CC0001-CO-255	Tree Cutting - Leprechaun Waste Rock Piles	28	08-Oct-22 A	04-Nov-22 A
CC0001-CO-200	Tree Cutting - Fresh Water Intake Road and Pad (Seq 4)	12	09-Oct-22 A	20-Oct-22 A
CC0001-CO-265	Tree Cutting - Leprechaun Overburden Stockpile	34	13-Oct-22 A	15-Nov-22 A
CC0001-CO-275	Tree Cutting - Climate Monitoring Station	6	19-Oct-22 A	24-Oct-22 A
CC0001-CO-120	Tree Cutting - Haul Road / Leprechaun - Pit to Plant site, inc. crusher location (Seq 1)	57	20-Oct-22 A	15-Dec-22 A
CC0001-CO-180	Tree Cutting - Access Road to Plant Site (Seq 7)	35	21-Oct-22 A	24-Nov-22 A
CC0001-CO-215	Tree Cutting - Upgrades to Road (Seq 6) - TMF Re-alignment/Diversion Km 78 to 80.5	49	29-Oct-22 A	16-Dec-22 A
CC0001-CO-160	Tree Cutting - Process Plant / ROM / Truck Shop / Substation Area (Seq 9)	29	03-Nov-22 A	01-Dec-22 A
CC0001-CO-150	Tree Cutting - TMF Area (considering revised qtys) (Seq 10)	107	22-Nov-22 A	11-Feb-23 A
CC0001-CO-140	Tree Cutting - Marathon Pit	45	12-Feb-23 A	28-Mar-23 A
CC0001-CO-285	Tree Cutting - Leprechaun Low Grade Stockpile	14	12-Feb-23 A	25-Feb-23 A
CC0001-CO-295	Tree Cutting - Haul Road / Plant site to Marathon Pit	8	26-Feb-23 A	26-Mar-23 A
CC0001-CO-235	Tree Cutting - Marathon Overburden Stockpiles	103	06-Mar-23 A	14-Sep-23 A
CC0001-CO-245	Tree Cutting - Marathon Low Grade Stockpile	96	07-Mar-23 A	14-Sep-23 A
CC0001-CO-305	Tree Cutting - Leprechaun Waste Rock Piles (add. Areas to clean)	24	15-Aug-23 A	19-Nov-23 A
CC0001-CO-225	Tree Cutting - Marathon Waste Rock Piles	35	15-Sep-23 A	10-Nov-23 A
CC0001-CO-115	Tree Cutting - Diffuser Alignment Camp Pad (Seq 3) + Diffuser line camp to Victoria Lake	7	10-Oct-23 A	22-Nov-23 A
CC0001-CO-205	Tree Cutting - Communication Tower (On Hold - To be confirmed)	7	29-Feb-24*	06-Mar-24
1000 - Mining		587	25-Aug-22 A	03-May-25
Mining Equipment		40	25-Aug-22 A	12-Oct-22 A
PM1302 - Fuel Supply & Storage		40	25-Aug-22 A	12-Oct-22 A
PM1302-CO-100	Temporary Fuel Supply - Mobilisation & Skids fabrication	23	25-Aug-22 A	21-Sep-22 A
PM1302-CO-110	Temporary Fuel Supply - Install / Commissioning Fuel Tank	17	21-Sep-22 A	12-Oct-22 A

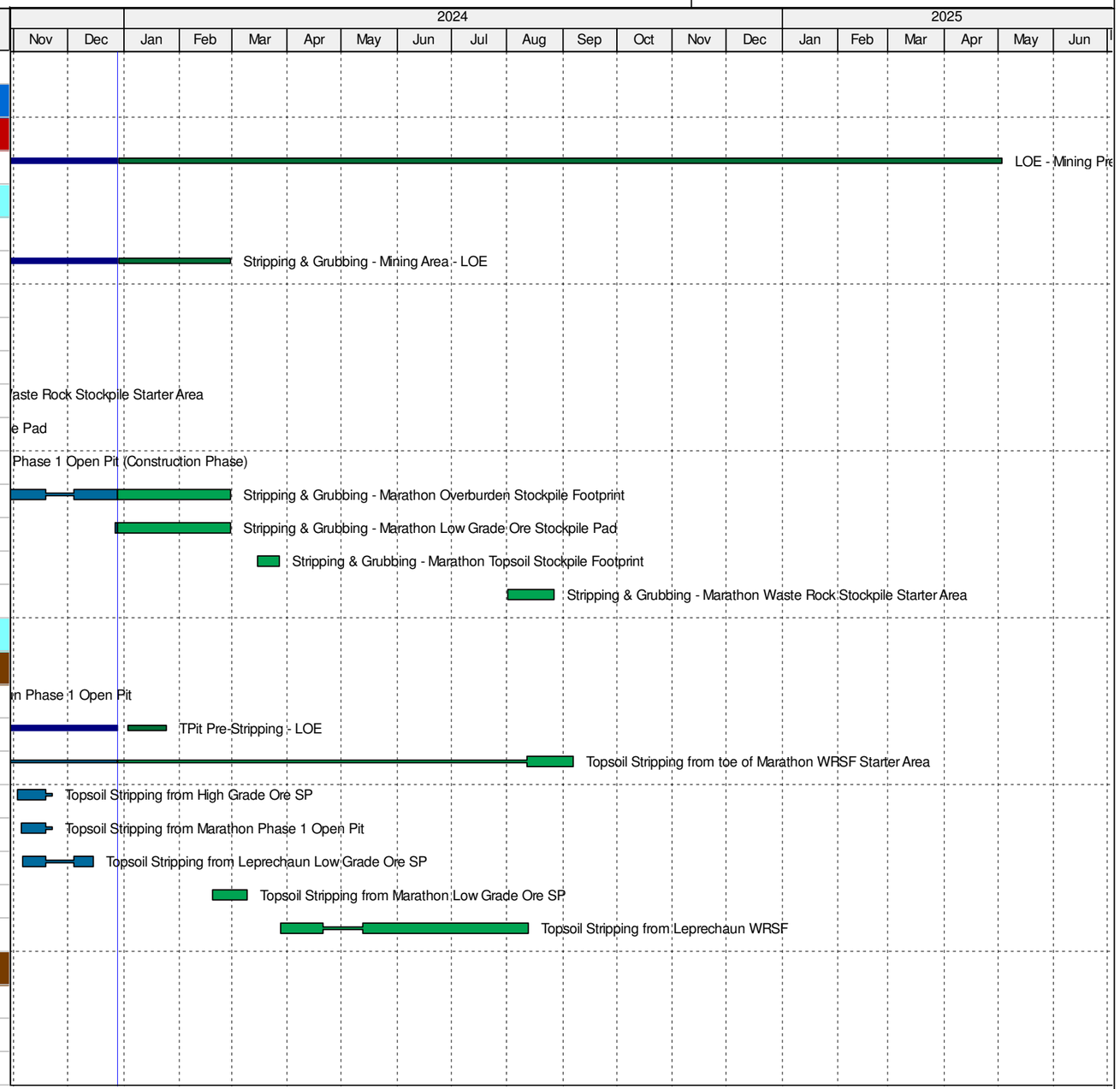


Remaining Level of Effort | Actual Work | Critical Remaining Work
Actual Level of Effort | Remaining Work | Milestone

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
PM1302-CO-120	Temporary Fuel Supply - Temporary Setup complete	0		12-Oct-22 A
1100 - Mine Infrastructure & Services		559	05-Oct-22 A	03-May-25
CG1101 - Mining Pre-development		559	05-Oct-22 A	03-May-25
CG1101-OP-010	LOE - Mining Pre-Development	797	05-Oct-22 A	03-May-25
1110 - Stripping and Grubbing		628	05-Oct-22 A	27-Aug-24
CG1101-1620	Stripping & Grubbing - Leprechaun Topsoil Stockpile Footprint	10	05-Oct-22 A	14-Oct-22 A
CG1101-2200	Stripping & Grubbing - Mining Area - LOE	10	05-Oct-22 A	29-Feb-24
CG1101-1460	Stripping & Grubbing - Leprechaun Phase 1 Open Pit	165	05-Oct-22 A	31-Mar-23 A
CG1101-1600	Stripping & Grubbing - Leprechaun Overburden Stockpile Footprint	9	15-Oct-22 A	23-Oct-22 A
CG1101-1420	Stripping & Grubbing - Haul Road Routes	155	15-Oct-22 A	31-Mar-23 A
CG1101-1660	Stripping & Grubbing - Leprechaun Waste Rock Stockpile Starter Area	31	13-Mar-23 A	21-Jun-23 A
CG1101-1640	Stripping & Grubbing - Leprechaun Low Grade Ore Stockpile Pad	10	31-Mar-23 A	10-Apr-23 A
CG1101-1440	Stripping & Grubbing - Marathon Phase 1 Open Pit (Construction Phase)	35	31-May-23 A	07-Jul-23 A
CG1101-1500	Stripping & Grubbing - Marathon Overburden Stockpile Footprint	100	10-Jun-23 A	29-Feb-24
CG1101-1560	Stripping & Grubbing - Marathon Low Grade Ore Stockpile Pad	20	27-Dec-23 A	29-Feb-24
CG1101-1520	Stripping & Grubbing - Marathon Topsoil Stockpile Footprint	13	15-Mar-24	27-Mar-24
CG1101-1580	Stripping & Grubbing - Marathon Waste Rock Stockpile Starter Area	26	01-Aug-24*	27-Aug-24
1140 - Pit Pre-Stripping		524	05-Oct-22 A	02-Nov-24
Topsoil Stripping		524	05-Oct-22 A	06-Sep-24
CG1101-1140	Topsoil Stripping from Leprechaun Phase 1 Open Pit	83	05-Oct-22 A	07-Jul-23 A
CG1101-2400	TPit Pre-Stripping - LOE	83	05-Oct-22 A	24-Jan-24
CG1101-1160	Topsoil Stripping from toe of Marathon WRSF Starter Area	248	09-Oct-23 A	06-Sep-24
CG1101-1890	Topsoil Stripping from High Grade Ore SP	17	03-Nov-23 A	22-Nov-23 A
CG1101-1120	Topsoil Stripping from Marathon Phase 1 Open Pit	136	05-Nov-23 A	22-Nov-23 A
CG1101-1870	Topsoil Stripping from Leprechaun Low Grade Ore SP	10	06-Nov-23 A	15-Dec-23 A
CG1101-1880	Topsoil Stripping from Marathon Low Grade Ore SP	18	19-Feb-24	09-Mar-24
CG1101-1830	Topsoil Stripping from Leprechaun WRSF	100	28-Mar-24	12-Aug-24
Pit Dewatering for Pre-Stripping - Leprechaun Pit		84	28-Oct-22 A	27-Feb-23 A
CG1101-DE-130	Stage 1 - AREA 57,560 m2	84	28-Oct-22 A	24-Feb-23 A
CG1101-DE-140	STAGE 2 - AREA 366,825 m2	84	28-Oct-22 A	27-Feb-23 A
CG1101-DE-150	Stage 3 - AREA 222,359m2	84	28-Oct-22 A	24-Feb-23 A

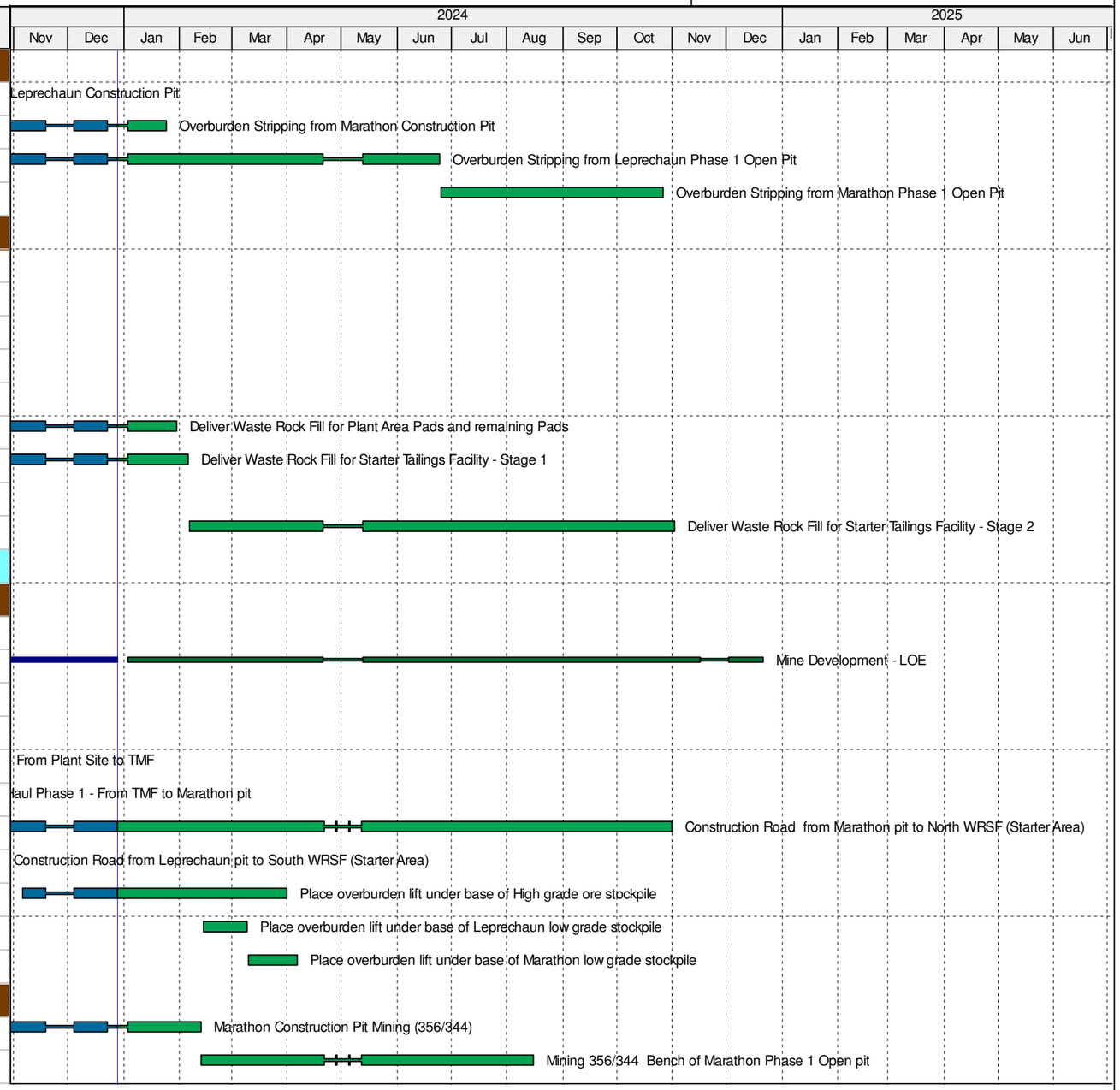


Remaining Level of Effort
Actual Level of Effort
Actual Work
Remaining Work
Critical Remaining Work
Milestone

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
Overburden Stripping		567	05-Oct-22 A	26-Oct-24
CG1101-1900	Overburden Stripping from Leprechaun Construction Pit	150	05-Oct-22 A	25-Jul-23 A
CG1101-1910	Overburden Stripping from Marathon Construction Pit	107	26-Jul-23 A	24-Jan-24
CG1101-1200	Overburden Stripping from Leprechaun Phase 1 Open Pit	150	23-Oct-23 A	24-Jun-24
CG1101-1180	Overburden Stripping from Marathon Phase 1 Open Pit	107	25-Jun-24	26-Oct-24
Waste Rock Development		572	06-Oct-22 A	02-Nov-24
CG1101-CO-1925	Waste Rock extraction - Leprechaun - Commence Drilling	4	06-Oct-22 A	10-Oct-22 A
CG1101-CO-1090	1st Blast at Leprechaun - Start blasting of Waste Rock to Mobile Crushing Plant	0	11-Oct-22 A	11-Oct-22 A
CG1101-CO-1985	Load, Haul & Place Waste Rock to Access Road	10	11-Oct-22 A	21-Oct-22 A
CG1101-CO-1065	Load, Haul & Place Waste Rock to Haul Roads	142	21-Oct-22 A	20-May-23 A
CG1101-CO-1980	Load, Haul & Place Waste Rock to Batch Plant Pad	10	12-Feb-23 A	18-Feb-23 A
CG1101-CO-1100	Deliver Waste Rock Fill for Plant Area Pads and remaining Pads	167	27-Feb-23 A	30-Jan-24
CG1101-CO-1080	Deliver Waste Rock Fill for Starter Tailings Facility - Stage 1	197	26-May-23 A	05-Feb-24
CG1101-CO-2005	1st Blast at Marathon	1	15-Jul-23 A	17-Jul-23 A
CG1101-CO-1920	Deliver Waste Rock Fill for Starter Tailings Facility - Stage 2	215	06-Feb-24	02-Nov-24
1120 - Mine Development		555	12-Oct-22 A	21-Dec-24
Construction - Haul Road		364	20-Oct-22 A	21-Dec-24
CG1101-2005	Construction Haul Road - From Leprechaun pit to Overburden Stockpile	25	20-Oct-22 A	17-Nov-22 A
CG1101-2300	Mine Development - LOE	25	20-Oct-22 A	21-Dec-24
CG1101-1780	Construction Haul Road Phase 1 - From Leprechaun pit to Plant site (19m Wide)	40	03-Dec-22 A	11-Jan-23 A
CG1101-2015	Construction - Road from Haul Road to Process Plant Pad	4	12-Jan-23 A	15-Jan-23 A
CG1101-CO-1785	Construction Haul Road Phase 1 - From Plant Site to TMF	77	26-May-23 A	03-Jul-23 A
CG1101-CO-1787	Construction Road Haul Phase 1 - From TMF to Marathon pit	38	24-Jul-23 A	17-Aug-23 A
CG1101-1820	Construction Road from Marathon pit to North WRSF (Starter Area)	36	10-Sep-23 A	31-Oct-24
CG1101-1700	Construction Road from Leprechaun pit to South WRSF (Starter Area)	24	16-Oct-23 A	25-Oct-23 A
CG1101-1995	Place overburden lift under base of High grade ore stockpile	28	06-Nov-23 A	31-Mar-24
CG1101-1760	Place overburden lift under base of Leprechaun low grade stockpile	22	14-Feb-24*	09-Mar-24
CG1101-1740	Place overburden lift under base of Marathon low grade stockpile	27	10-Mar-24	06-Apr-24
Marathon Pit Development		328	11-Sep-23 A	21-Dec-24
CG1101-1930	Marathon Construction Pit Mining (356/344)	95	11-Sep-23 A	12-Feb-24
CG1101-1240	Mining 356/344 Bench of Marathon Phase 1 Open pit	167	13-Feb-24	15-Aug-24



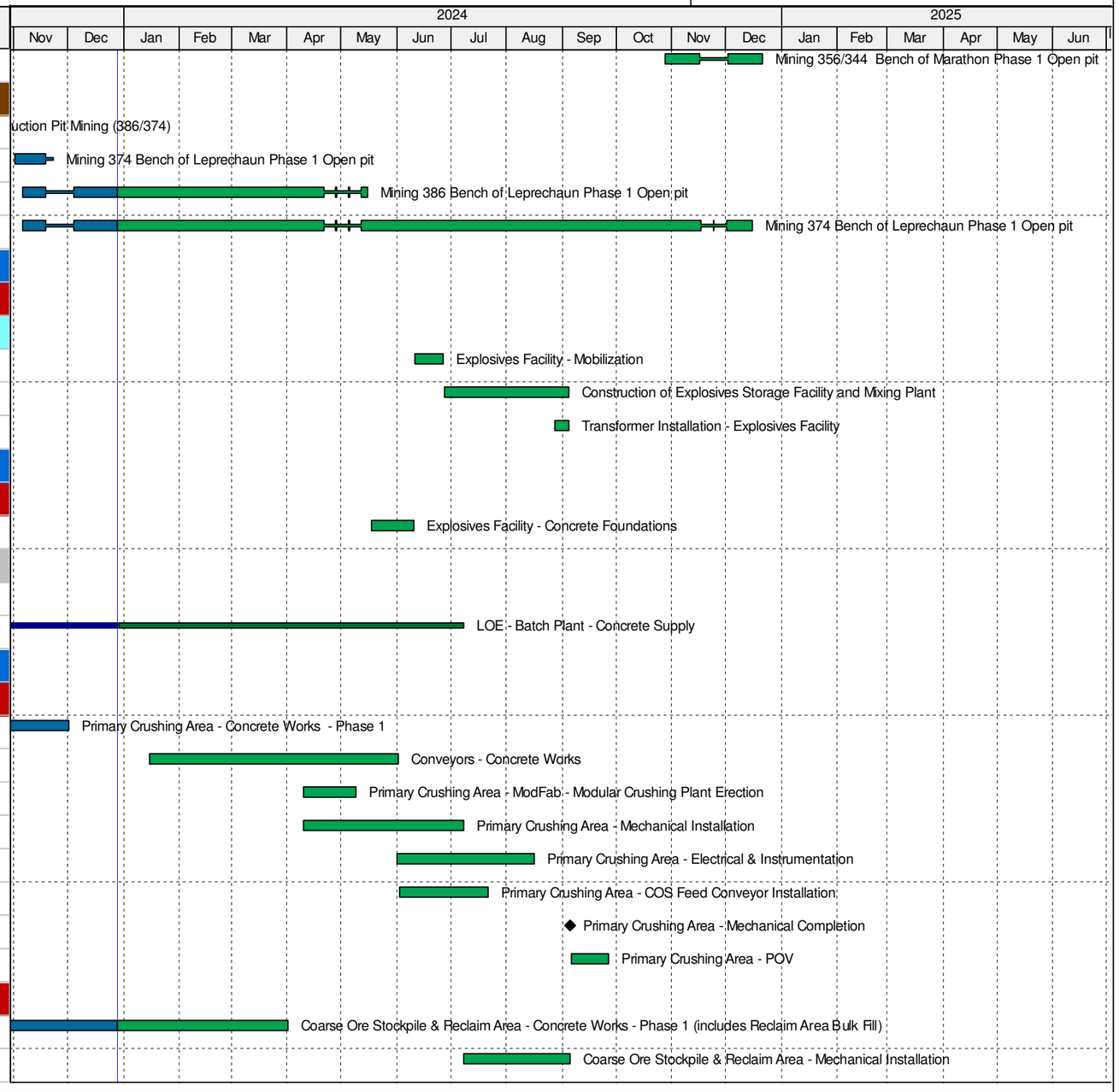
Remaining Level of Effort
Actual Level of Effort
Actual Work
Remaining Work
Critical Remaining Work
Milestone

MARATHON GOLD

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
CG1101-1260	Mining 356/344 Bench of Marathon Phase 1 Open pit	36	28-Oct-24	21-Dec-24
Leprechaun Pit Development		640	12-Oct-22 A	15-Dec-24
CG1101-1940	Leprechaun Construction Pit Mining (386/374)	99	12-Oct-22 A	20-Aug-23 A
CG1101-1400	Mining 374 Bench of Leprechaun Phase 1 Open pit	42	01-Nov-23 A	23-Nov-23 A
CG1101-1380	Mining 386 Bench of Leprechaun Phase 1 Open pit	35	06-Nov-23 A	15-May-24
CG1101-1950	Mining 374 Bench of Leprechaun Phase 1 Open pit	133	06-Nov-23 A	15-Dec-24
1200 - Mine Fixed Equipment		62	11-Jun-24	04-Sep-24
1210 - Explosives Magazine and Mix Plant		62	11-Jun-24	04-Sep-24
Construction		62	11-Jun-24	04-Sep-24
TK1201-CO-1710	Explosives Facility - Mobilization	14	11-Jun-24	26-Jun-24
TK1201-CO-1720	Construction of Explosives Storage Facility and Mixing Plant	60	27-Jun-24	04-Sep-24
CE2001-CO-1830	Transformer Installation - Explosives Facility	7	28-Aug-24	04-Sep-24
CB2001 - Civil & Concrete Contract		20	18-May-24	10-Jun-24
Construction		20	18-May-24	10-Jun-24
CB2001-CO-100	Explosives Facility - Concrete Foundations	20	18-May-24*	10-Jun-24
2000 - Process Plant		419	29-Mar-23 A	18-Nov-24
CB2002-CO-160	Batch Plant - Concrete Trial Mixes	14	29-Mar-23 A	13-May-23 A
CB2002-CO-010	LOE - Batch Plant - Concrete Supply	14	13-May-23 A	08-Jul-24
2100 - Primary Crushing		291	26-Jul-23 A	26-Sep-24
2120 - Primary Crushing and COS Feed Conveyor		232	17-Oct-23 A	26-Sep-24
CB2001-CO-120	Primary Crushing Area - Concrete Works - Phase 1	23	17-Oct-23 A	01-Dec-23 A
CB2001-CO-3840	Conveyors - Concrete Works	139	15-Jan-24*	01-Jun-24
TK2101-CO-190	Primary Crushing Area - ModFab - Modular Crushing Plant Erection	30	10-Apr-24	09-May-24
CG2002-CO-220	Primary Crushing Area - Mechanical Installation	90	10-Apr-24	08-Jul-24
CE2001-CO-260	Primary Crushing Area - Electrical & Instrumentation	77	01-Jun-24	16-Aug-24
CG2002-CO-3850	Primary Crushing Area - COS Feed Conveyor Installation	50	02-Jun-24	21-Jul-24
CG2001-CO-340	Primary Crushing Area - Mechanical Completion	0		05-Sep-24
CG2001-CO-350	Primary Crushing Area - POV	21	06-Sep-24	26-Sep-24
2130 - Coarse Ore Stockpile and Reclaim		291	26-Jul-23 A	26-Sep-24
CB2001-CO-3800	Coarse Ore Stockpile & Reclaim Area - Concrete Works - Phase 1 (includes Reclaim Area Bulk Fill)	80	26-Jul-23 A	01-Apr-24
CG2002-CO-200	Coarse Ore Stockpile & Reclaim Area - Mechanical Installation	60	08-Jul-24	05-Sep-24



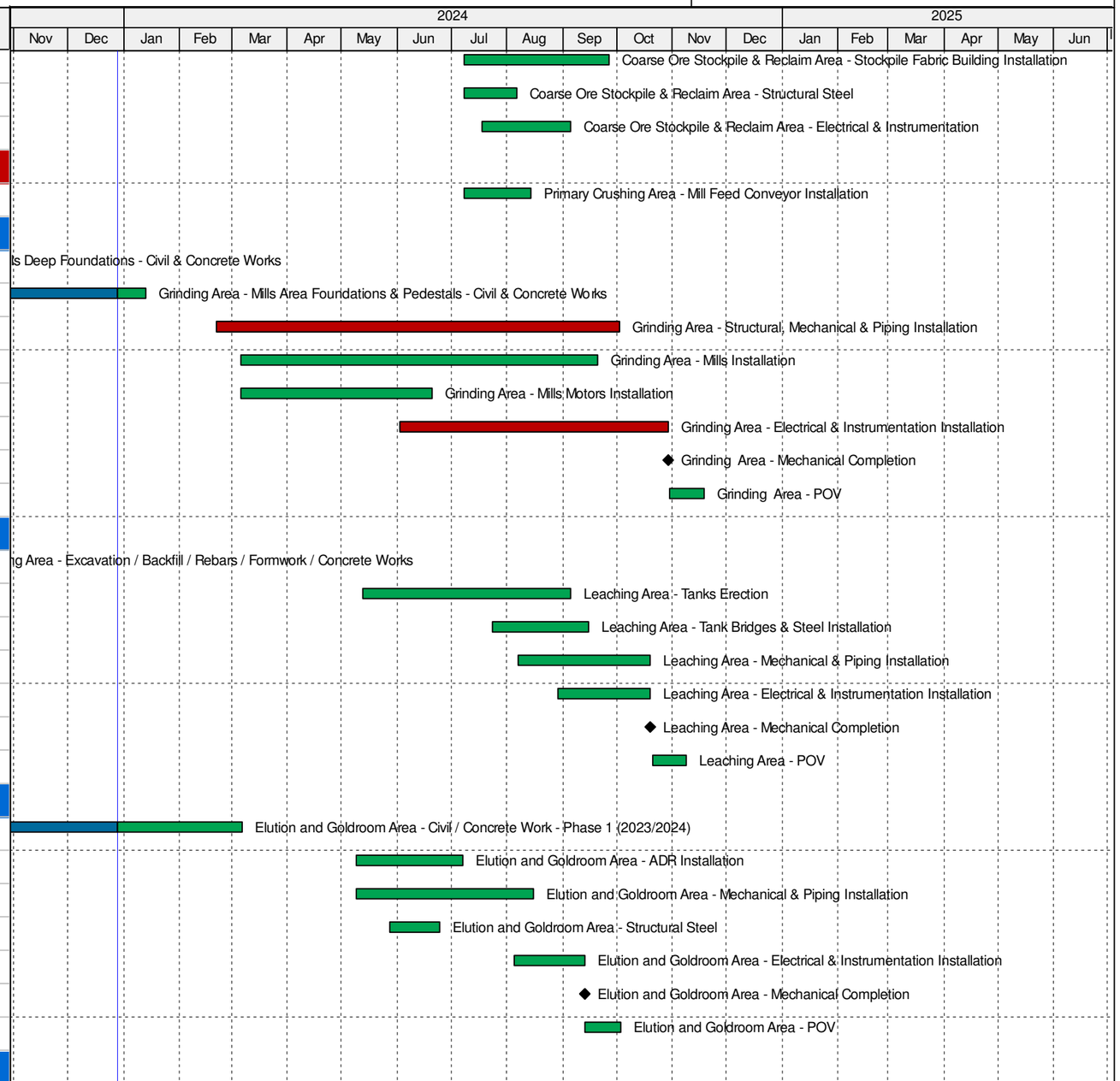
Remaining Level of Effort | Actual Work | Critical Remaining Work
Actual Level of Effort | Remaining Work | Milestone

MARATHON GOLD

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
TK3606-CO-3810	Coarse Ore Stockpile & Reclaim Area - Stockpile Fabric Building Installation	81	08-Jul-24	26-Sep-24
CG2002-CO-3820	Coarse Ore Stockpile & Reclaim Area - Structural Steel	30	08-Jul-24	06-Aug-24
CE2001-CO-3830	Coarse Ore Stockpile & Reclaim Area - Electrical & Instrumentation	50	18-Jul-24	05-Sep-24
2140 - Mill Feed Conveyor		38	08-Jul-24	14-Aug-24
CG2002-CO-3860	Primary Crushing Area - Mill Feed Conveyor Installation	38	08-Jul-24*	14-Aug-24
2200 - Grinding		352	14-Jul-23 A	18-Nov-24
CB2001-CO-130A	Grinding Area - Mills Deep Foundations - Civil & Concrete Works	44	14-Jul-23 A	24-Aug-23 A
CB2001-CO-130	Grinding Area - Mills Area Foundations & Pedestals - Civil & Concrete Works	125	15-Jul-23 A	13-Jan-24
CG2002-CO-390	Grinding Area - Structural, Mechanical & Piping Installation	224	21-Feb-24	02-Oct-24
CG2002-CO-395	Grinding Area - Mills Installation	199	06-Mar-24	20-Sep-24
CG2002-CO-3870	Grinding Area - Mills Motors Installation	107	06-Mar-24	20-Jun-24
CE2001-CO-510	Grinding Area - Electrical & Instrumentation Installation	150	02-Jun-24	29-Oct-24
CG2001-CO-660	Grinding Area - Mechanical Completion	0		29-Oct-24
CG2001-CO-670	Grinding Area - POV	20	30-Oct-24	18-Nov-24
2300 - Leaching		345	19-Jun-23 A	08-Nov-24
CB2001-CO-160	Leaching Area - Excavation / Backfill / Rebars / Formwork / Concrete Works	130	19-Jun-23 A	29-Sep-23 A
CM2001-CO-280	Leaching Area - Tanks Erection	116	12-May-24	05-Sep-24
CG2002-CO-380	Leaching Area - Tank Bridges & Steel Installation	54	24-Jul-24	15-Sep-24
CG2002-CO-460	Leaching Area - Mechanical & Piping Installation	64	07-Aug-24	19-Oct-24
CE2001-CO-500	Leaching Area - Electrical & Instrumentation Installation	45	29-Aug-24	19-Oct-24
CG2001-CO-600	Leaching Area - Mechanical Completion	0		19-Oct-24
CG2001-CO-610	Leaching Area - POV	17	21-Oct-24	08-Nov-24
2400 - Elution and Goldroom		256	21-Aug-23 A	03-Oct-24
CB2001-CO-330	Elution and Goldroom Area - Civil / Concrete Work - Phase 1 (2023/2024)	43	21-Aug-23 A	06-Mar-24
CG2002-CO-420	Elution and Goldroom Area - ADR Installation	60	09-May-24	07-Jul-24
CG2002-CO-490	Elution and Goldroom Area - Mechanical & Piping Installation	99	09-May-24	15-Aug-24
CG2002-CO-370	Elution and Goldroom Area - Structural Steel	24	27-May-24	24-Jun-24
CE2001-CO-530	Elution and Goldroom Area - Electrical & Instrumentation Installation	40	05-Aug-24	13-Sep-24
CG2001-CO-580	Elution and Goldroom Area - Mechanical Completion	0		13-Sep-24
CG2001-CO-590	Elution and Goldroom Area - POV	17	13-Sep-24	03-Oct-24
2500 - Tailings Disposal		302	22-Jun-23 A	05-Oct-24



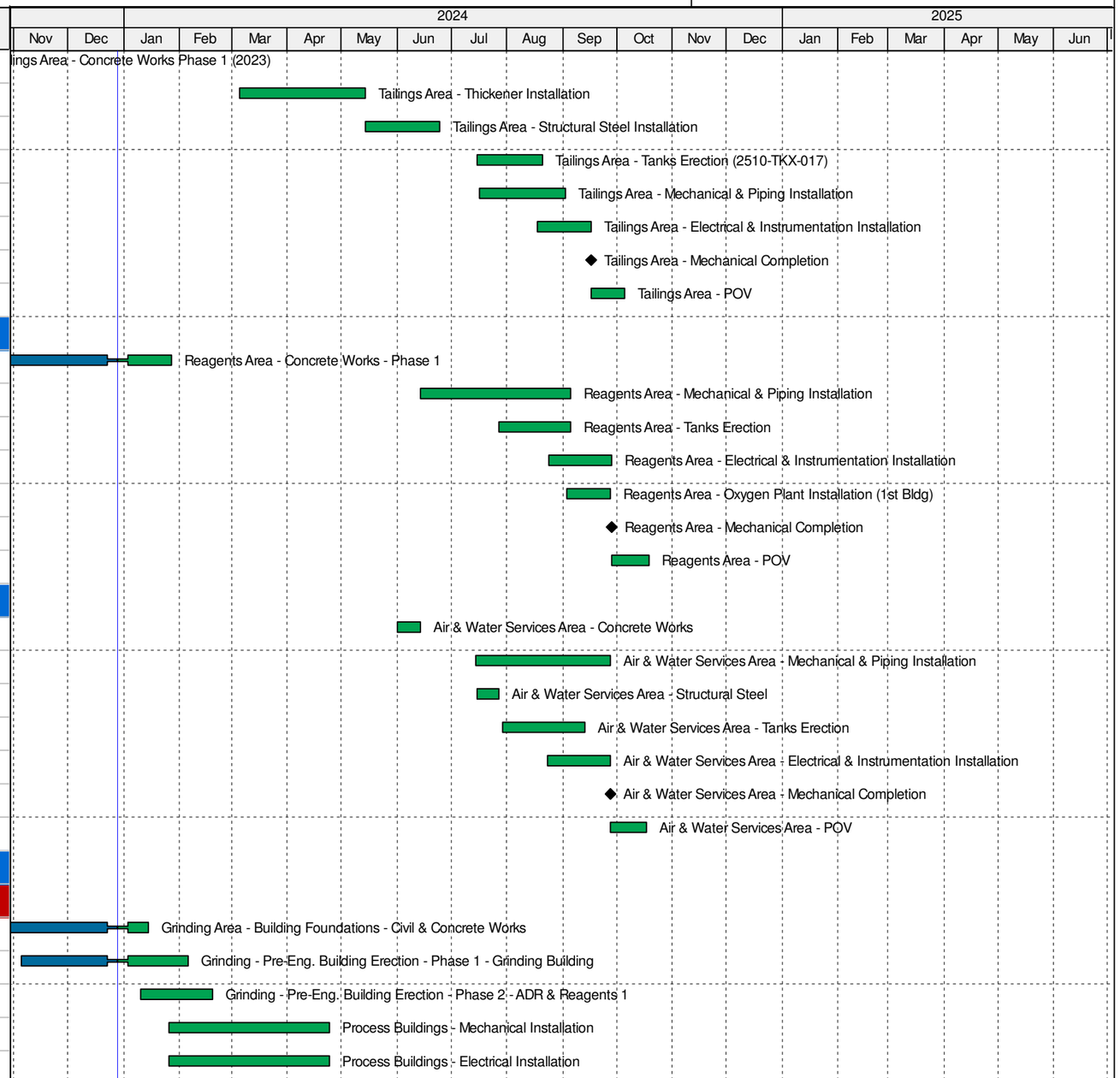
Remaining Level of Effort
Actual Level of Effort
Actual Work
Remaining Work
Critical Remaining Work
Milestone

MARATHON GOLD

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
CB2001-CO-290	Tailings Area - Concrete Works Phase 1 (2023)	68	22-Jun-23 A	13-Oct-23 A
CG2002-CO-430	Tailings Area - Thickener Installation	60	05-Mar-24	14-May-24
CG2002-CO-440	Tailings Area - Structural Steel Installation	35	14-May-24	24-Jun-24
CM2001-CO-400	Tailings Area - Tanks Erection (2510-TKX-017)	31	15-Jul-24	20-Aug-24
CG2002-CO-480	Tailings Area - Mechanical & Piping Installation	48	17-Jul-24	02-Sep-24
CE2001-CO-540	Tailings Area - Electrical & Instrumentation Installation	30	17-Aug-24	16-Sep-24
CG2001-CO-620	Tailings Area - Mechanical Completion	0		16-Sep-24
CG2001-CO-630	Tailings Area - POV	17	17-Sep-24	05-Oct-24
2600 - Reagents		263	11-Sep-23 A	19-Oct-24
CB2001-CO-210	Reagents Area - Concrete Works - Phase 1	33	11-Sep-23 A	27-Jan-24
CG2002-CO-320	Reagents Area - Mechanical & Piping Installation	71	14-Jun-24	05-Sep-24
CM2001-CO-250	Reagents Area - Tanks Erection	40	27-Jul-24	05-Sep-24
CE2001-CO-520	Reagents Area - Electrical & Instrumentation Installation	30	24-Aug-24	28-Sep-24
TK2601-CO-100	Reagents Area - Oxygen Plant Installation (1st Bldg)	20	03-Sep-24	27-Sep-24
CG2001-CO-560	Reagents Area - Mechanical Completion	0		28-Sep-24
CG2001-CO-570	Reagents Area - POV	21	28-Sep-24	19-Oct-24
2700 - Air & Water Services		99	01-Jun-24	17-Oct-24
CB2001-CO-360	Air & Water Services Area - Concrete Works	13	01-Jun-24	13-Jun-24
CG2002-CO-470	Air & Water Services Area - Mechanical & Piping Installation	75	14-Jul-24	27-Sep-24
CG2002-CO-450	Air & Water Services Area - Structural Steel	12	15-Jul-24	27-Jul-24
CM2001-CO-410	Air & Water Services Area - Tanks Erection	40	29-Jul-24	13-Sep-24
CE2001-CO-550	Air & Water Services Area - Electrical & Instrumentation Installation	30	23-Aug-24	27-Sep-24
CG2001-CO-640	Air & Water Services Area - Mechanical Completion	0		27-Sep-24
CG2001-CO-650	Air & Water Services Area - POV	17	27-Sep-24	17-Oct-24
2800 - Process Buildings		273	25-Aug-23 A	10-Sep-24
2820 - Mill Building		188	25-Aug-23 A	14-May-24
CB2001-CO-140	Grinding Area - Building Foundations - Civil & Concrete Works	65	25-Aug-23 A	14-Jan-24
CA2001-CO-170	Grinding - Pre-Eng. Building Erection - Phase 1 - Grinding Building	45	05-Nov-23 A	05-Feb-24
CA2001-CO-3680	Grinding - Pre-Eng. Building Erection - Phase 2 - ADR & Reagents 1	41	10-Jan-24*	19-Feb-24
CA2001-CO-240	Process Buildings - Mechanical Installation	90	26-Jan-24*	24-Apr-24
CA2001-CO-270	Process Buildings - Electrical Installation	90	26-Jan-24	24-Apr-24

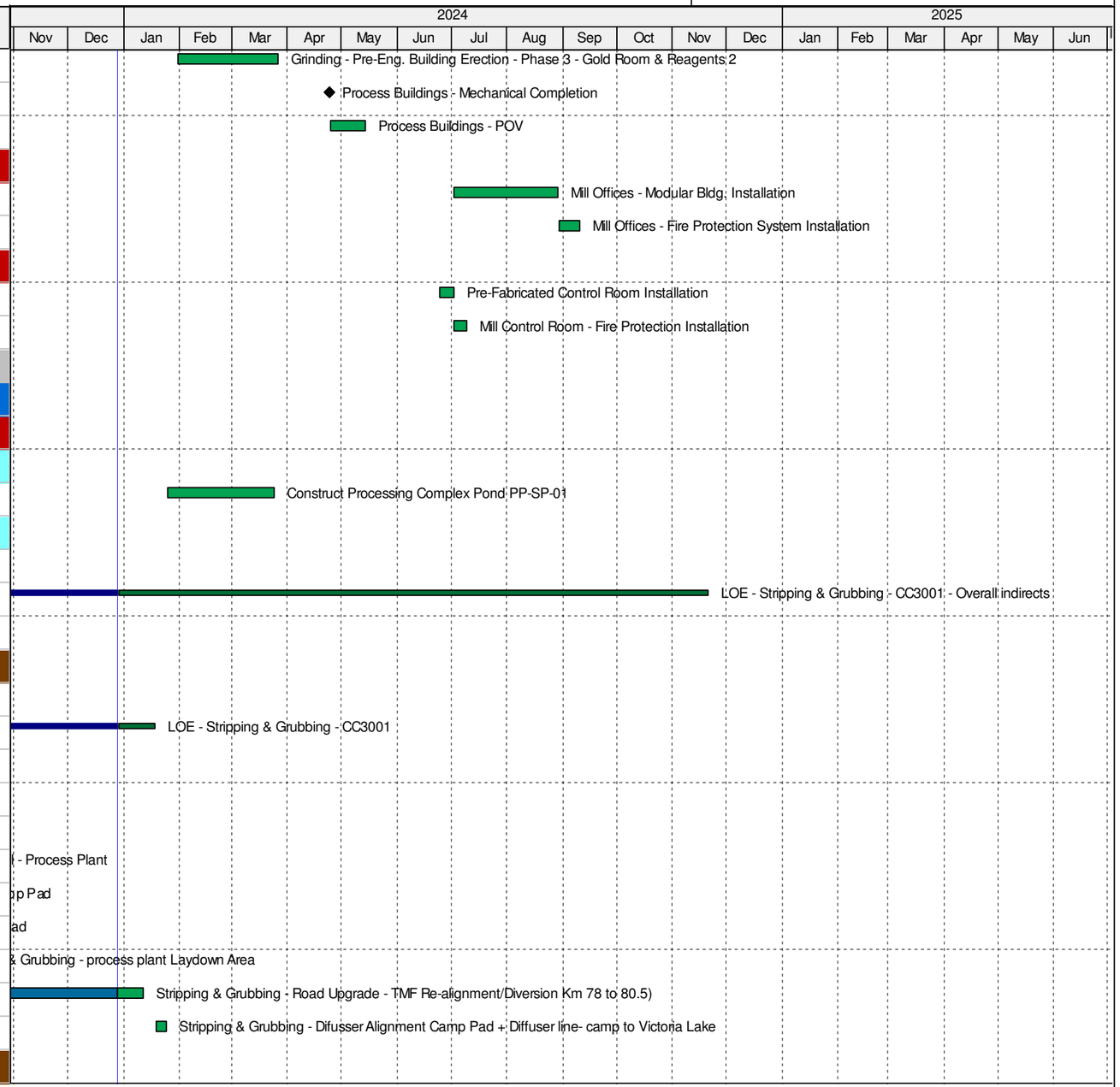


Remaining Level of Effort
Actual Level of Effort
Actual Work
Remaining Work
Critical Remaining Work
Milestone

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
CA2001-CO-3690	Grinding - Pre-Eng. Building Erection - Phase 3 - Gold Room & Reagents 2	56	31-Jan-24	26-Mar-24
CG2001-CO-300	Process Buildings - Mechanical Completion	0		24-Apr-24
CG2001-CO-310	Process Buildings - POV	17	25-Apr-24	14-May-24
2840 - Mill Office		60	02-Jul-24	10-Sep-24
CA2001-CO-3640	Mill Offices - Modular Bldg. Installation	50	02-Jul-24*	29-Aug-24
CG2002-CO-3645	Mill Offices - Fire Protection System Installation	10	30-Aug-24	10-Sep-24
2850 - Mill Control Room		13	24-Jun-24	09-Jul-24
CA2001-CO-3670	Pre-Fabricated Control Room Installation	7	24-Jun-24	02-Jul-24
CG2002-CO-3675	Mill Control Room - Fire Protection Installation	6	02-Jul-24	09-Jul-24
3000 - On Site Infrastructure		611	06-Jun-22 A	20-Nov-24
3100 Bulk Earthworks		360	12-Oct-22 A	20-Nov-24
CC3001 - Major Earthworks		360	12-Oct-22 A	20-Nov-24
Water management		60	25-Jan-24	24-Mar-24
CC3001-WM-110	Construct Processing Complex Pond PP-SP-01	60	25-Jan-24	24-Mar-24
Construction		330	12-Oct-22 A	20-Nov-24
CC3001-CO-100	Earthworks - Mobilisation	14	12-Oct-22 A	25-Oct-22 A
CC3001-CO-010	LOE - Stripping & Grubbing - CC3001 - Overall indirects	256	25-Oct-22 A	20-Nov-24
CC3001-CO-080	Earthworks - Mobile Crusher Setup	6	31-May-23 A	07-Jun-23 A
Stripping & Grubbing		318	12-Oct-22 A	24-Jan-24
CC3001-CO-280	Stripping & Grubbing - Accommodation Complex Pad Access Road	2	12-Oct-22 A	13-Oct-22 A
CC3001-CO-0010	LOE - Stripping & Grubbing - CC3001	256	12-Oct-22 A	18-Jan-24
CC3001-CO-110	Stripping & Grubbing - Accommodation Complex Pad	8	13-Oct-22 A	20-Oct-22 A
CC3001-CO-285	Stripping & Grubbing - Fresh Water Intake Road and Pad	24	21-Oct-22 A	13-Nov-22 A
CC3001-CO-200	Stripping & Grubbing - Access Road to Process Plant site	38	01-Nov-22 A	08-Dec-22 A
CC3001-CO-120	Stripping, Grubbing & USM removal - Process Plant	47	30-Jan-23 A	28-Jun-23 A
CC3001-CO-140	Stripping & Grubbing - Truck Shop Pad	8	24-May-23 A	09-Jul-23 A
CC3001-CO-130	Stripping & Grubbing - ROM Pad	15	15-Jun-23 A	16-Jul-23 A
CC3001-CO-260	Clearing & Grubbing - process plant Laydown Area	15	14-Sep-23 A	22-Sep-23 A
CC4102-CO-220	Stripping & Grubbing - Road Upgrade - TMF Re-alignment/Diversion Km 78 to 80.5)	10	11-Oct-23 A	11-Jan-24
CC3001-CO-2995	Stripping & Grubbing - Difusser Alignment Camp Pad + Diffuser line- camp to Victoria Lake	5	19-Jan-24*	24-Jan-24
Earthworks		329	13-Oct-22 A	30-Apr-24

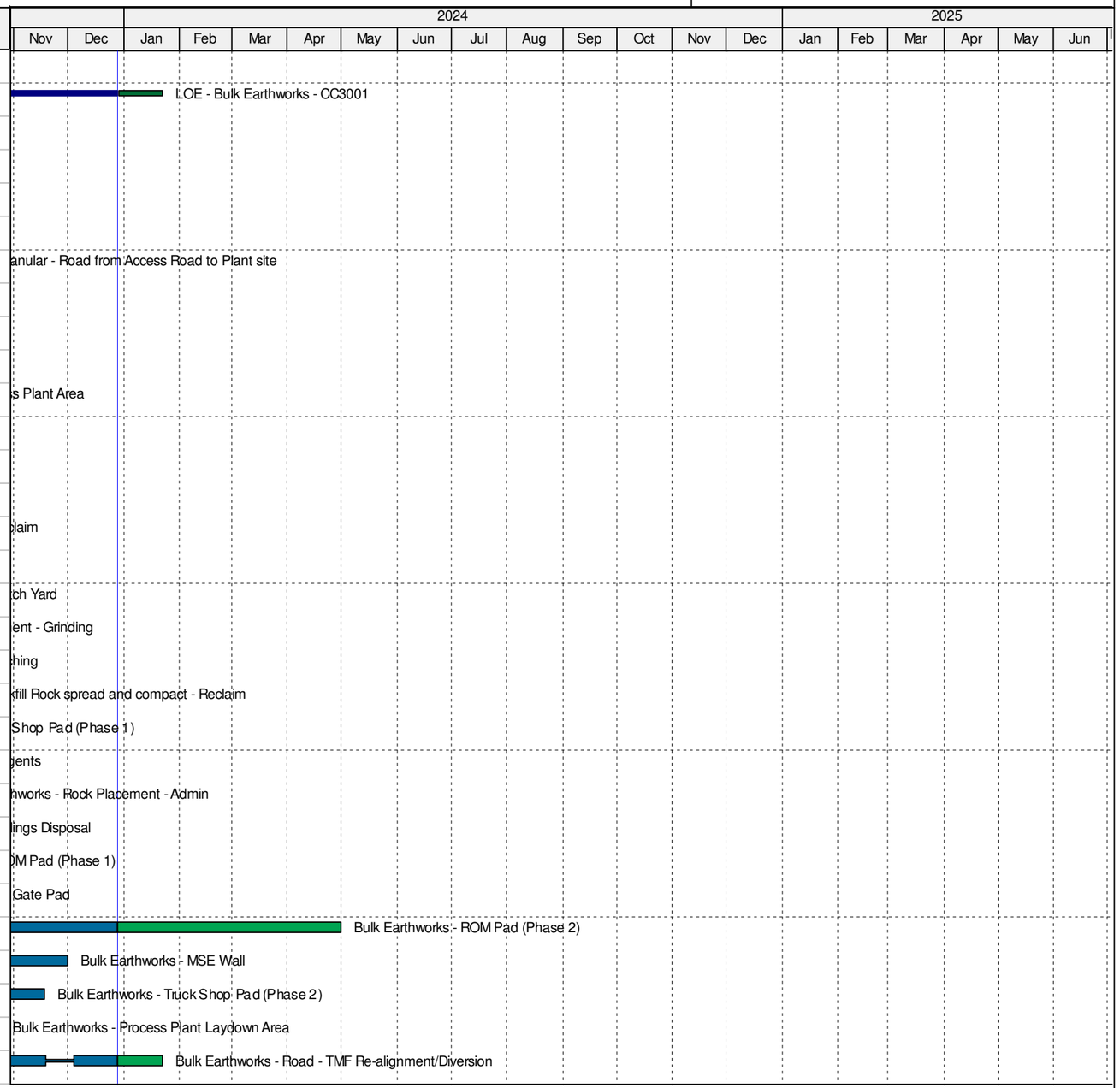


Remaining Level of Effort
Actual Level of Effort
Actual Work
Remaining Work
Critical Remaining Work
Milestone

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
CC3001-CO-290	Bulk Earthworks - Cut & Fill & Granular Cap - Accommodation Pad Access Road	1	13-Oct-22 A	13-Oct-22 A
CC3001-CO-1020	LOE - Bulk Earthworks - CC3001	273	13-Oct-22 A	22-Jan-24
CC3001-CO-4027	Bulk Earthworks - Excavation - Accommodation Complex Pad (Removal of USM)	32	17-Oct-22 A	17-Nov-22 A
CC3001-CO-415	Bulk Earthworks - Cut & Fill & Wearing Course - Fresh Water Intake Road and Pad	16	29-Oct-22 A	13-Nov-22 A
CC3001-CO-150	Bulk Earthworks - Cut & Fill - Accommodation Complex Pad (PHASE 1 - Q2 & Q4)	12	18-Nov-22 A	29-Nov-22 A
CC3001-CO-4017	Bulk Earthworks - Cut & Fill - Accommodation Complex Pad (PHASE 2 - Q3)	10	30-Nov-22 A	09-Dec-22 A
CC3001-CO-210	Bulk Earthworks - Cut & Fill & Granular - Road from Access Road to Plant site	108	09-Dec-22 A	09-Jul-23 A
CC3001-CO-4037	Bulk Earthworks - Cut & Fill - Accommodation Complex Pad (PHASE 3 - Q1)	16	09-Dec-22 A	25-Dec-22 A
CC3001-CO-310	Construction Drainage - Accommodation Complex Pad Area	5	10-Dec-22 A	14-Dec-22 A
CC3001-CO-4047	Bulk Earthworks - Climate Monitoring Station Area	1	11-Jan-23 A	27-Jan-23 A
CC3001-CO-510	Construction Drainage - Process Plant Area	15	27-Feb-23 A	13-Jul-23 A
CC3001-CO-160	Bulk Earthworks - Process Plant	59	27-Feb-23 A	15-Jun-23 A
CC3001-CO-160-10	Bulk Earthworks - Rock Placement - Grinding	29	20-Mar-23 A	17-Apr-23 A
CC3001-CO-160-20	Bulk Earthworks - Rock Placement - Leaching	59	25-Mar-23 A	17-Apr-23 A
CC3001-CO-160-60	Bulk Earthworks - Backfill Rock spread and compact - Reclaim	17	01-Apr-23 A	17-Apr-23 A
CC3001-CO-160-50	Bulk Earthworks - Rock Placement - Main Switch Yard	6	12-Apr-23 A	17-Apr-23 A
CC3001-CO-160-50	Bulk Earthworks - Rock Placement - Main Switch Yard	0	07-May-23 A	26-May-23 A
CC3001-CO-160-10	Bulk Earthworks - Rock Placement - Grinding	12	14-May-23 A	13-Jul-23 A
CC3001-CO-160-20	Bulk Earthworks - Rock Placement - Leaching	0	19-May-23 A	10-Jun-23 A
CC3001-CO-160-60	Bulk Earthworks - Backfill Rock spread and compact - Reclaim	11	23-May-23 A	10-Aug-23 A
CC3001-CO-180	Bulk Earthworks - Truck Shop Pad (Phase 1)	91	24-May-23 A	05-Aug-23 A
CC3001-CO-160-30	Bulk Earthworks - Rock Placement - Reagents	9	30-May-23 A	10-Jun-23 A
CC3001-CO-160-40	Bulk Earthworks - Rock Placement - Admin	25	06-Jun-23 A	22-Sep-23 A
CC3001-CO-160-20	Bulk Earthworks - Rock Placement - Tailings Disposal	7	09-Jun-23 A	15-Jun-23 A
CC3001-CO-170	Bulk Earthworks - ROM Pad (Phase 1)	30	26-Jun-23 A	16-Aug-23 A
CC3001-CO-500	Bulk Earthworks - Main Gate Pad	7	17-Jul-23 A	08-Aug-23 A
CC3001-CO-345	Bulk Earthworks - ROM Pad (Phase 2)	74	29-Jul-23 A	30-Apr-24
CC3001-CO-4067	Bulk Earthworks - MSE Wall	45	29-Jul-23 A	30-Nov-23 A
CC3001-CO-4057	Bulk Earthworks - Truck Shop Pad (Phase 2)	108	06-Aug-23 A	18-Nov-23 A
CC3001-CO-270	Bulk Earthworks - Process Plant Laydown Area	16	14-Sep-23 A	23-Oct-23 A
CC3001-CO-230	Bulk Earthworks - Road - TMF Re-alignment/Diversion	48	11-Oct-23 A	22-Jan-24

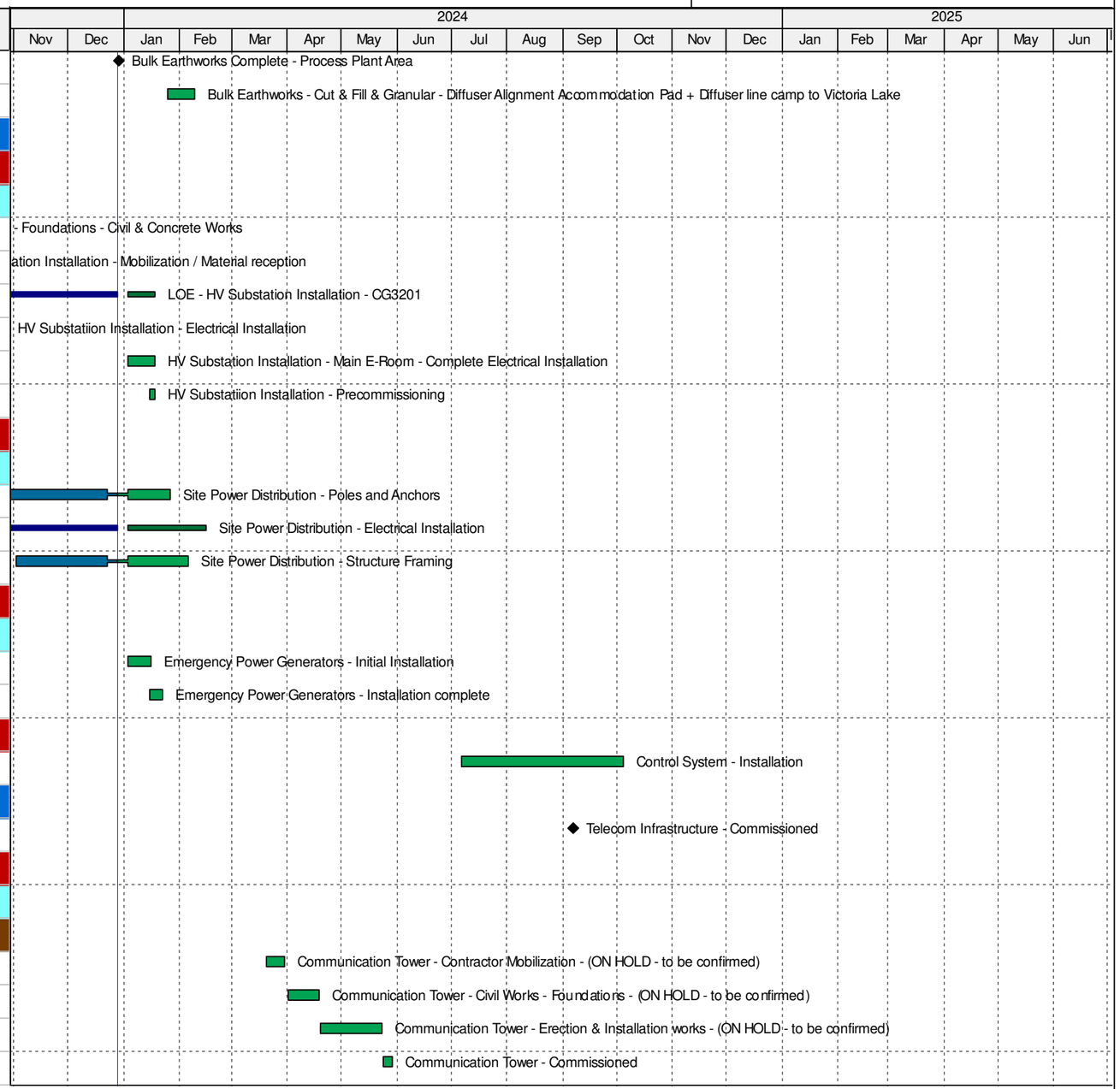


Remaining Level of Effort
Actual Level of Effort
Actual Work
Remaining Work
Critical Remaining Work
Milestone

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
CC3001-CO-300	Bulk Earthworks Complete - Process Plant Area	0		29-Dec-23
CC3001-CO-425	Bulk Earthworks - Cut & Fill & Granular - Diffuser Alignment Accommodation Pad + Diffuser line camp to Victoria Lake	16	25-Jan-24	09-Feb-24
3200 - HV Power Switchyard and Power Distribution		344	30-May-23 A	04-Oct-24
CG3201 - HV Substation Installation (C-0011)		158	30-May-23 A	18-Jan-24
Construction		158	30-May-23 A	18-Jan-24
CB2001-CO-110	HV Substation Installation - Foundations - Civil & Concrete Works	45	30-May-23 A	28-Jul-23 A
CG3201-CO-100	HV Substation Installation - Mobilization / Material reception	16	17-Jul-23 A	22-Sep-23 A
CG3201-CO-010	LOE - HV Substation Installation - CG3201	51	17-Jul-23 A	18-Jan-24
CG3201-CO-120	HV Substatiion Installation - Electrical Installation	67	07-Sep-23 A	27-Oct-23 A
CE3201-CO-3760	HV Substation Installation - Main E-Room - Complete Electrical Installation	16	03-Jan-24	18-Jan-24
CG3201-CO-130	HV Substatiion Installation - Precommissioning	3	15-Jan-24	18-Jan-24
3220 - Site Power Distribution		100	05-Sep-23 A	15-Feb-24
Construction		100	05-Sep-23 A	15-Feb-24
CB2001-CO-1220	Site Power Distribution - Poles and Anchors	35	05-Sep-23 A	26-Jan-24
CE3201-CO-1260	Site Power Distribution - Electrical Installation	100	05-Sep-23 A	15-Feb-24
CE3201-CO-1230	Site Power Distribution - Structure Framing	23	02-Nov-23 A	05-Feb-24
3230 - Emergency Power Generation		20	03-Jan-24	22-Jan-24
Construction		20	03-Jan-24	22-Jan-24
CE3201-CO-1240	Emergency Power Generators - Initial Installation	13	03-Jan-24*	16-Jan-24
CE3201-CO-3820	Emergency Power Generators - Installation complete	7	15-Jan-24	22-Jan-24
3240 - Control System		90	06-Jul-24	04-Oct-24
CE2001-CO-1250	Control System - Installation	90	06-Jul-24	04-Oct-24
3300 - Communications - Internet & Cell Services		440	07-Dec-22 A	06-Sep-24
PJ3302-CO-200	Telecom Infrastructure - Commissioned	0		06-Sep-24
3320 - Radio Communications at site		368	07-Dec-22 A	29-May-24
TK3301 - Microwave Communications (On Hold)		51	20-Mar-24	29-May-24
Construction		51	20-Mar-24	29-May-24
TK3301-CO-100	Communication Tower - Contractor Mobilization - (ON HOLD - to be confirmed)	10	20-Mar-24	30-Mar-24
TK3301-CO-110	Communication Tower - Civil Works - Foundations - (ON HOLD - to be confirmed)	16	01-Apr-24	18-Apr-24
TK3301-CO-170	Communication Tower - Erection & Installation works - (ON HOLD - to be confirmed)	30	19-Apr-24	23-May-24
TK3301-CO-180	Communication Tower - Commissioned	5	24-May-24	29-May-24

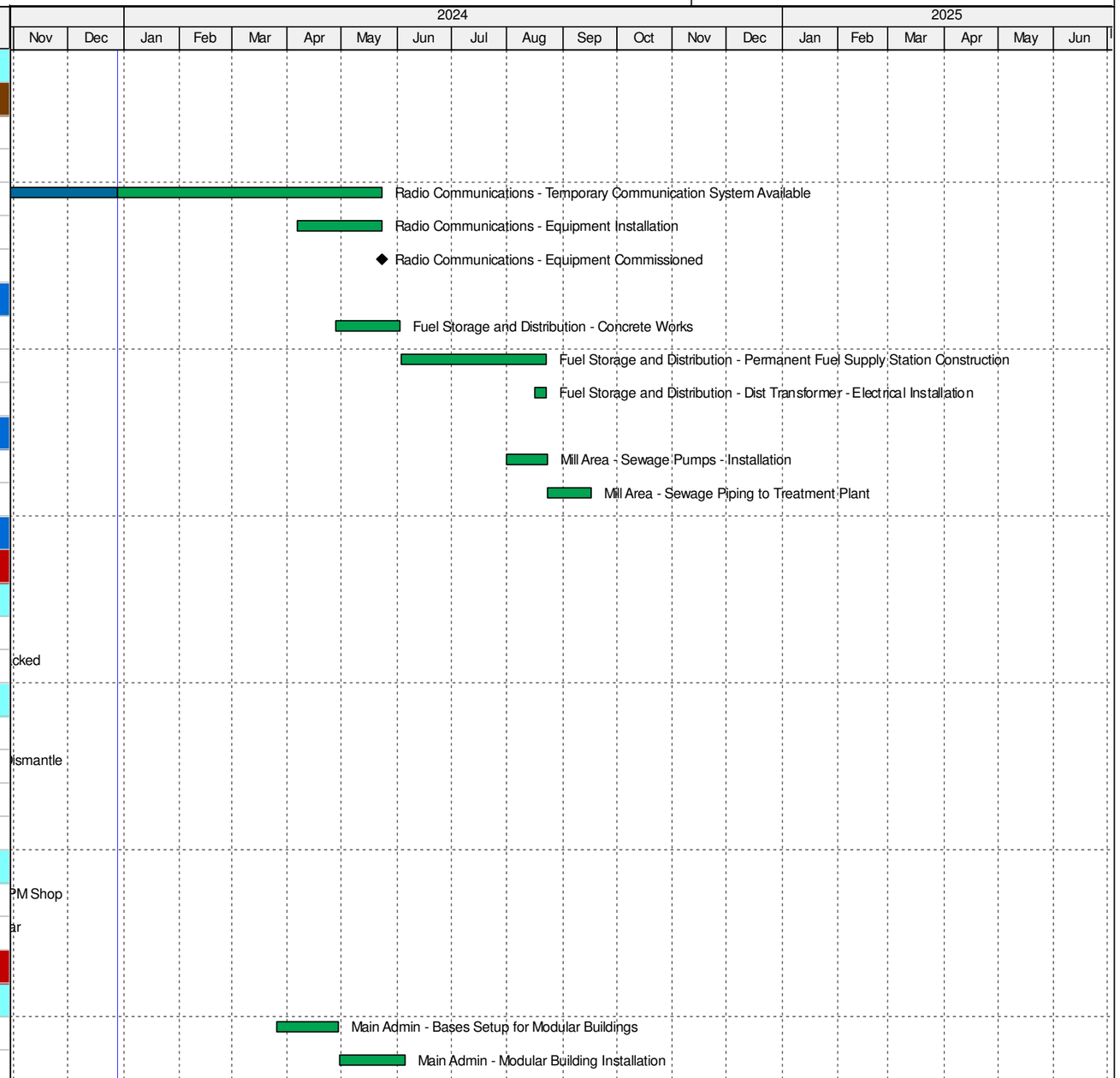


Remaining Level of Effort
Actual Level of Effort
Actual Work
Remaining Work
Critical Remaining Work
Milestone

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
TK3302 - VHF Radio Communication		364	07-Dec-22 A	23-May-24
Construction		364	07-Dec-22 A	23-May-24
TK3302-CO-100	Radio Communications - Temporary Trailer Setup	3	07-Dec-22 A	09-Dec-22 A
TK3302-CO-105	Radio Communications - Temporary Trailer - Testing Period	49	10-Dec-22 A	23-Mar-23 A
TK3302-CO-110	Radio Communications - Temporary Communication System Available	168	24-Mar-23 A	23-May-24
TK3302-CO-120	Radio Communications - Equipment Installation	41	06-Apr-24	23-May-24
TK3302-CO-130	Radio Communications - Equipment Commissioned	0		23-May-24
3400 - Fuel Storage		84	28-Apr-24	22-Aug-24
CB2001-CO-3400	Fuel Storage and Distribution - Concrete Works	36	28-Apr-24*	02-Jun-24
PM1302-CO-3405	Fuel Storage and Distribution - Permanent Fuel Supply Station Construction	70	03-Jun-24	22-Aug-24
CE2001-CO-3410	Fuel Storage and Distribution - Dist Transformer - Electrical Installation	6	16-Aug-24	22-Aug-24
3500 - Sewage		40	31-Jul-24	16-Sep-24
CG2002-CO-3500	Mill Area - Sewage Pumps - Installation	20	31-Jul-24	23-Aug-24
CG2002-CO-3510	Mill Area - Sewage Piping to Treatment Plant	20	23-Aug-24	16-Sep-24
3600 - Buildings		291	09-Aug-23 A	01-Oct-24
TK3608 - MEM/Warehouse Relocation To MMF		12	09-Aug-23 A	25-Aug-23 A
Preparation		3	09-Aug-23 A	12-Aug-23 A
TK3608-CO-3880	Mapping Layout	1	09-Aug-23 A	10-Aug-23 A
TK3608-CO-3890	Dome/Warehouse Packed	2	10-Aug-23 A	12-Aug-23 A
Demob		4	16-Aug-23 A	19-Aug-23 A
TK3608-CO-3920	Mobilize Contractors	1	16-Aug-23 A	16-Aug-23 A
TK3608-CO-4040	Prepare Dome for Dismantle	1	18-Aug-23 A	18-Aug-23 A
TK3608-CO-4050	Mobilize Crane	1	18-Aug-23 A	18-Aug-23 A
TK3608-CO-3930	Pull down Dome	1	19-Aug-23 A	19-Aug-23 A
Remob		3	22-Aug-23 A	25-Aug-23 A
TK3608-CO-3960	Assemble Dome/PM Shop	3	22-Aug-23 A	25-Aug-23 A
TK3608-CO-3980	Assemble Washcar	1	24-Aug-23 A	25-Aug-23 A
Construction		280	25-Aug-23 A	01-Oct-24
3610 - Main Admin Office		74	26-Mar-24	19-Jun-24
TK3607-CO-100	Main Admin - Bases Setup for Modular Buildings	30	26-Mar-24*	29-Apr-24
TK3607-CO-3610	Main Admin - Modular Building Installation	32	30-Apr-24	05-Jun-24



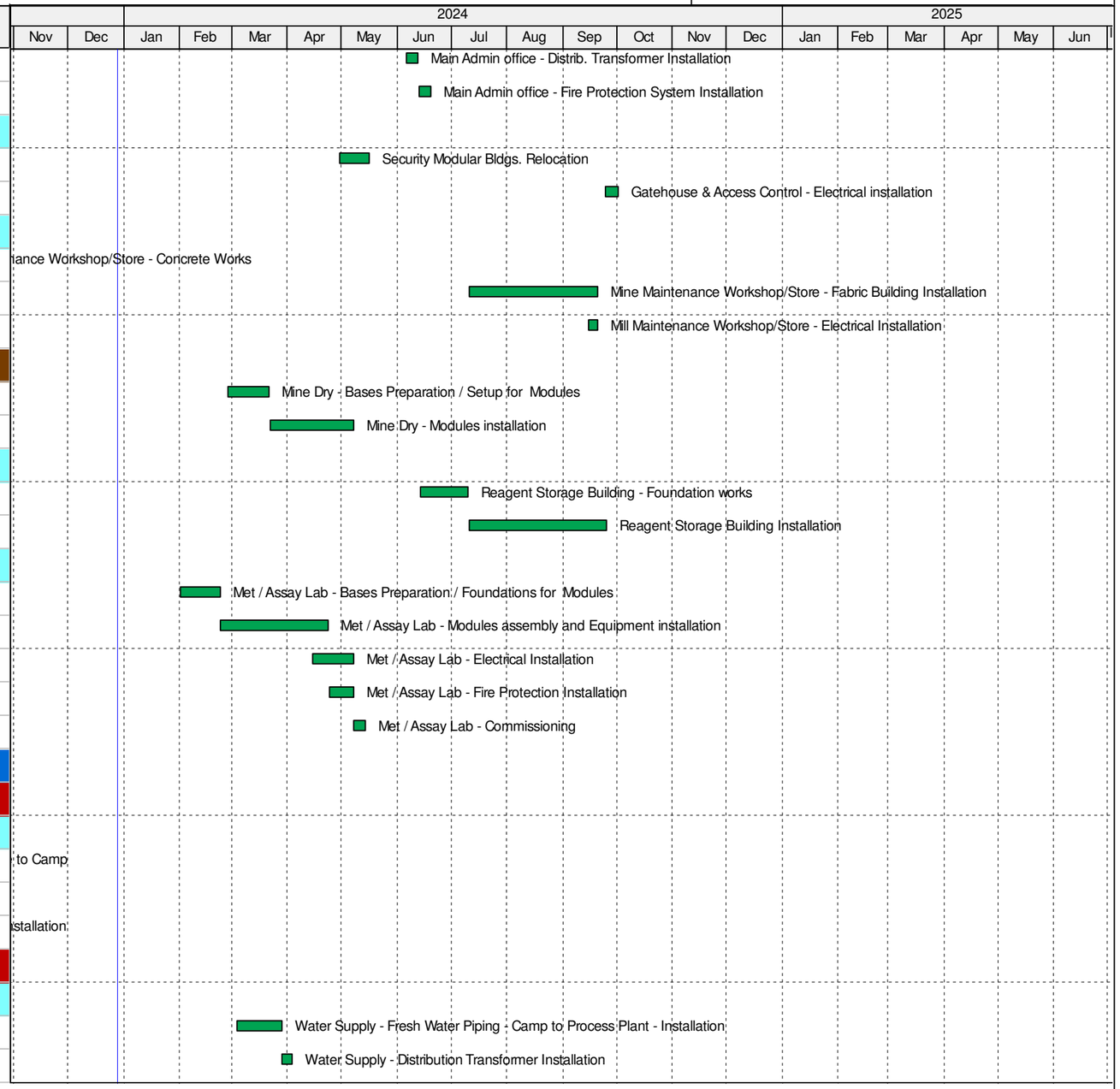
Remaining Level of Effort
Actual Level of Effort
Actual Work
Remaining Work
Critical Remaining Work
Milestone

MARATHON GOLD

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

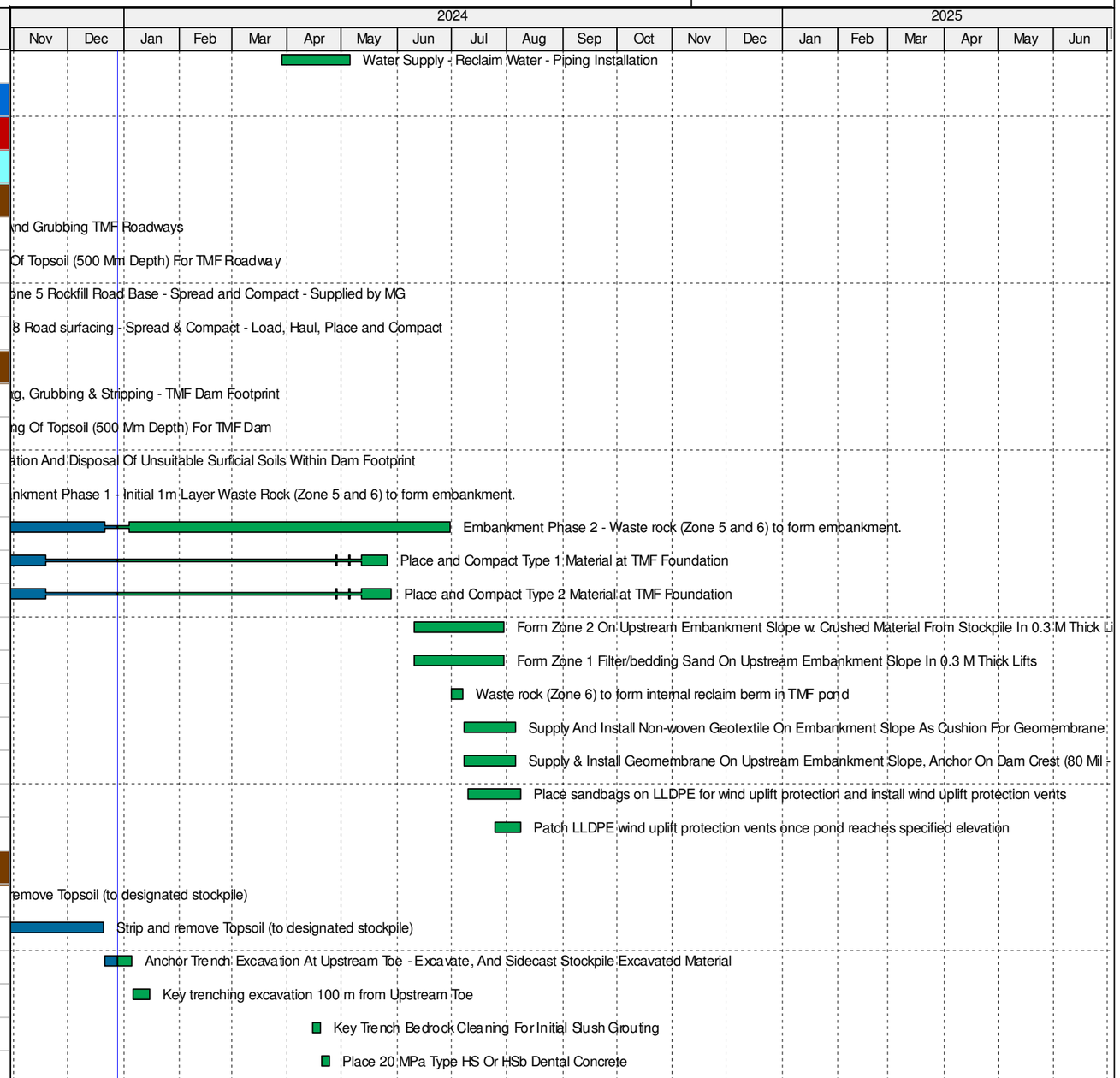
08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
TK3607-CO-3620	Main Admin office - Distrib. Transformer Installation	6	06-Jun-24	12-Jun-24
TK3607-CO-3630	Main Admin office - Fire Protection System Installation	6	13-Jun-24	19-Jun-24
3620 - Gatehouse & Access Control		133	30-Apr-24	01-Oct-24
TK3607-CO-3615	Security Modular Bldgs. Relocation	14	30-Apr-24*	16-May-24
TK3607-CO-3625	Gatehouse & Access Control - Electrical installation	6	24-Sep-24	01-Oct-24
3660 - Mine Maintenance Facility		273	25-Aug-23 A	20-Sep-24
CB2001-CO-3660	Mine Maintenance Workshop/Store - Concrete Works	14	25-Aug-23 A	11-Sep-23 A
TK3606-CO-3870	Mine Maintenance Workshop/Store - Fabric Building Installation	72	11-Jul-24	20-Sep-24
CE2001-CO-3665	Mill Maintenance Workshop/Store - Electrical Installation	6	15-Sep-24	20-Sep-24
3665 - Mine Dry		60	28-Feb-24	07-May-24
TK3607-CO-110	Mine Dry - Bases Preparation / Setup for Modules	20	28-Feb-24*	21-Mar-24
TK3607-CO-120	Mine Dry - Modules installation	40	22-Mar-24	07-May-24
3670 - Reagent Storage Building		89	14-Jun-24	25-Sep-24
CB2001-CO-105	Reagent Storage Building - Foundation works	23	14-Jun-24*	10-Jul-24
TK3606-CO-110	Reagent Storage Building Installation	66	11-Jul-24	25-Sep-24
3680 - Laboratory		88	01-Feb-24	14-May-24
TK3603-CO-100	Met / Assay Lab - Bases Preparation / Foundations for Modules	19	01-Feb-24	23-Feb-24
TK3603-CO-110	Met / Assay Lab - Modules assembly and Equipment installation	51	23-Feb-24	23-Apr-24
TK3603-CO-120	Met / Assay Lab - Electrical Installation	20	15-Apr-24	07-May-24
TK3603-CO-130	Met / Assay Lab - Fire Protection Installation	12	24-Apr-24	07-May-24
TK3603-CO-140	Met / Assay Lab - Commissioning	6	08-May-24	14-May-24
3700 - Water Supply		536	05-Nov-22 A	05-May-24
CC3001 - Fresh Water Pumping Station Installation		145	05-Nov-22 A	15-Apr-23 A
Construction		145	05-Nov-22 A	15-Apr-23 A
CC3001-CO-3750	Water Supply - Fresh Water Piping Installation - Victoria Lake to Camp	104	05-Nov-22 A	05-Apr-23 A
CC3001-CO-3700	Water Supply - Fresh Water Pump Intake Installation	102	24-Nov-22 A	05-Apr-23 A
CC3001-CO-3710	Water Supply - Pumps, Control Panel & VFD - Electrical Installation	14	28-Mar-23 A	15-Apr-23 A
CG2002 - SMP Contract		63	04-Mar-24	05-May-24
Construction		63	04-Mar-24	05-May-24
CC3001-CO-3730	Water Supply - Fresh Water Piping - Camp to Process Plant - Installation	25	04-Mar-24*	28-Mar-24
CC3001-CO-3720	Water Supply - Distribution Transformer Installation	6	29-Mar-24	03-Apr-24



Remaining Level of Effort
Actual Level of Effort
Actual Work
Remaining Work
Critical Remaining Work
Milestone

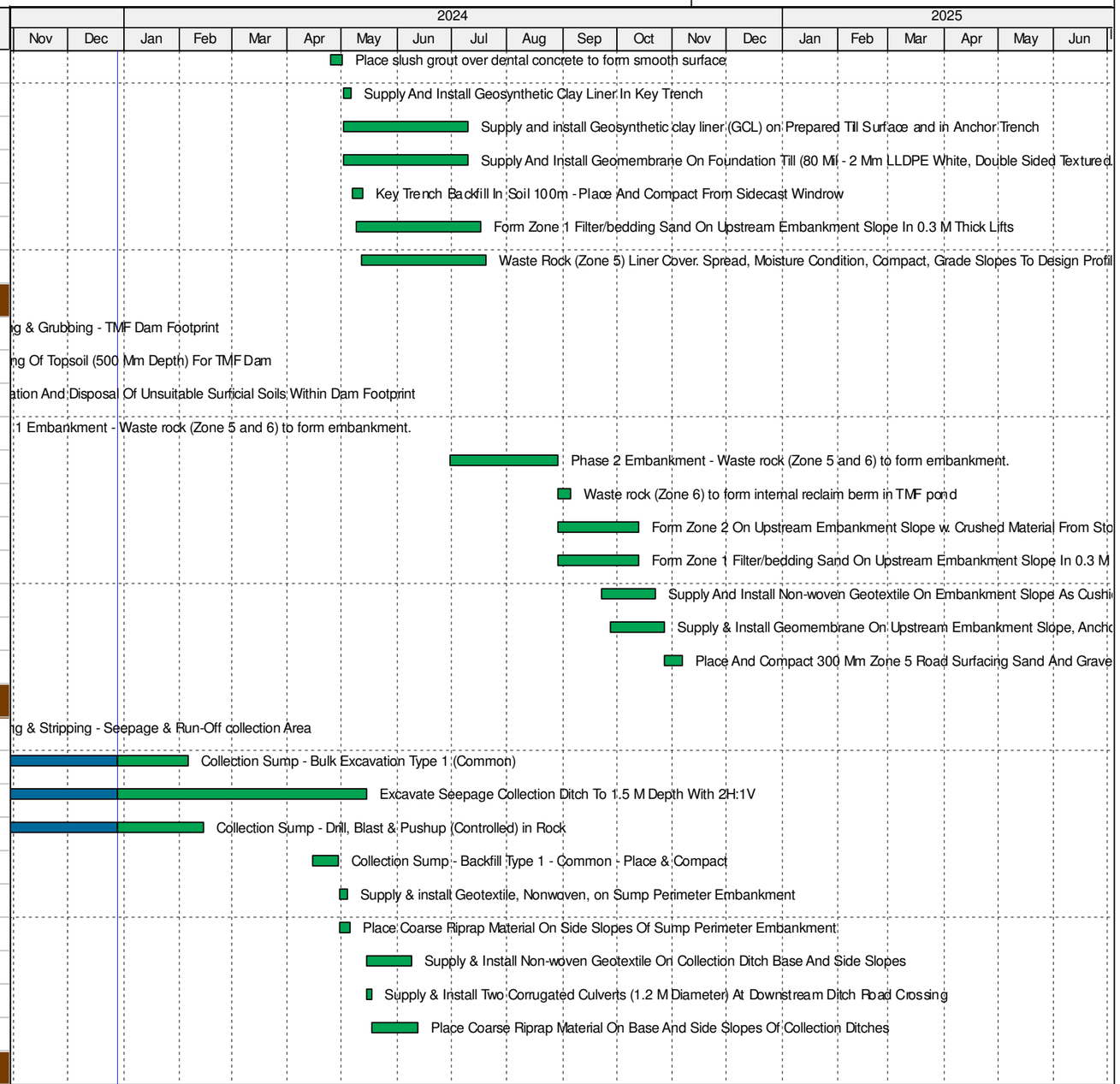
Activity ID	Activity Name	Original Duration	Start	Finish
CC3001-CO-3740	Water Supply - Reclaim Water - Piping Installation	38	29-Mar-24	05-May-24
3800 - Tailings Storage Facility		361	15-Jun-23 A	06-Nov-24
Construction - TMF Stage 1 and 2		361	15-Jun-23 A	06-Nov-24
CC3001 - Major Earthworks (TMF Construction)		361	15-Jun-23 A	06-Nov-24
TMF - Access Road Construction		215	15-Jun-23 A	17-Oct-23 A
CC3001-CO-8040	Clearing And Grubbing TMF Roadways	35	15-Jun-23 A	21-Sep-23 A
CC3001-CO-8622-N	Stripping Of Topsoil (500 Mm Depth) For TMF Roadway	35	15-Jun-23 A	21-Sep-23 A
CC3001-CO-8050	Zone 5 Rockfill Road Base - Spread and Compact - Supplied by MG	35	16-Jun-23 A	17-Oct-23 A
CC3001-CO-8060	Zone 8 Road surfacing - Spread & Compact - Load, Haul, Place and Compact	73	05-Oct-23 A	05-Oct-23 A
TMF - Stage 1 - DAM Construction		296	19-Jun-23 A	08-Aug-24
CC3001-CO-8000	Clearing, Grubbing & Stripping - TMF Dam Footprint	90	19-Jun-23 A	02-Oct-23 A
CC3001-CO-9210-N	Stripping Of Topsoil (500 Mm Depth) For TMF Dam	90	19-Jun-23 A	02-Oct-23 A
CC3001-CO-9211-N	Excavation And Disposal Of Unsuitable Surficial Soils Within Dam Footprint	3	20-Jun-23 A	02-Oct-23 A
CC3001-CO-8090	Embankment Phase 1 - Initial 1m Layer Waste Rock (Zone 5 and 6) to form embankment.	80	06-Jul-23 A	04-Oct-23 A
CC3001-CO-8150	Embankment Phase 2 - Waste rock (Zone 5 and 6) to form embankment.	120	30-Aug-23 A	30-Jun-24
CC3001-CO-9212-N	Place and Compact Type 1 Material at TMF Foundation	109	02-Sep-23 A	26-May-24
CC3001-CO-9213-N	Place and Compact Type 2 Material at TMF Foundation	109	04-Sep-23 A	28-May-24
CC3001-CO-8250	Form Zone 2 On Upstream Embankment Slope w. Crushed Material From Stockpile In 0.3 M Thick Lifts	51	10-Jun-24*	30-Jul-24
CC3001-CO-8260	Form Zone 1 Filter/bedding Sand On Upstream Embankment Slope In 0.3 M Thick Lifts	51	10-Jun-24	30-Jul-24
CC3001-CO-8155	Waste rock (Zone 6) to form internal reclaim berm in TMF pond	7	01-Jul-24	07-Jul-24
CC3001-CO-8270	Supply And Install Non-woven Geotextile On Embankment Slope As Cushion For Geomembrane	29	08-Jul-24	05-Aug-24
CC3001-CO-8280	Supply & Install Geomembrane On Upstream Embankment Slope, Anchor On Dam Crest (80 Mil - 2 Mm LLDPE White, DS Textured	29	08-Jul-24	05-Aug-24
CC3001-CO-8290	Place sandbags on LLDPE for wind uplift protection and install wind uplift protection vents	30	10-Jul-24	08-Aug-24
CC3001-CO-8300	Patch LLDPE wind uplift protection vents once pond reaches specified elevation	15	25-Jul-24	08-Aug-24
TMF - Liner Foundation Tie-In		282	16-Aug-23 A	20-Jul-24
CC3001-CO-8010	Strip and remove Topsoil (to designated stockpile)	19	16-Aug-23 A	20-Sep-23 A
CC3001-CO-8010B	Strip and remove Topsoil (to designated stockpile)	56	27-Sep-23 A	20-Dec-23 A
CC3001-CO-8015	Anchor Trench Excavation At Upstream Toe - Excavate, And Sidecast Stockpile Excavated Material	16	21-Dec-23 A	05-Jan-24
CC3001-CO-8580	Key trenching excavation 100 m from Upstream Toe	10	06-Jan-24	15-Jan-24
CC3001-CO-8590	Key Trench Bedrock Cleaning For Initial Slush Grouting	5	15-Apr-24*	19-Apr-24
CC3001-CO-8600	Place 20 MPa Type HS Or HSb Dental Concrete	5	20-Apr-24	24-Apr-24



VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
CC3001-CO-8610	Place slush grout over dental concrete to form smooth surface	7	25-Apr-24	01-May-24
CC3001-CO-8190	Supply And Install Geosynthetic Clay Liner In Key Trench	5	02-May-24	06-May-24
CC3001-CO-8210	Supply and install Geosynthetic clay liner (GCL) on Prepared Till Surface and in Anchor Trench	70	02-May-24	10-Jul-24
CC3001-CO-8220	Supply And Install Geomembrane On Foundation Till (80 Mil - 2 Mm LLDPE White, Double Sided Textured. Install over GCL	70	02-May-24	10-Jul-24
CC3001-CO-8200	Key Trench Backfill In Soil 100m - Place And Compact From Sidecast Windrow	6	07-May-24	12-May-24
CC3001-CO-8230	Form Zone 1 Filter/bedding Sand On Upstream Embankment Slope In 0.3 M Thick Lifts	70	09-May-24	17-Jul-24
CC3001-CO-8240	Waste Rock (Zone 5) Liner Cover. Spread, Moisture Condition, Compact, Grade Slopes To Design Profile	70	12-May-24	20-Jul-24
TMF - Stage 2 - DAM Construction		344	01-Jul-23 A	06-Nov-24
CC3001-CO-8410	Clearing & Grubbing - TMF Dam Footprint	98	01-Jul-23 A	02-Oct-23 A
CC3001-CO-9214-N	Stripping Of Topsoil (500 Mm Depth) For TMF Dam	98	01-Jul-23 A	02-Oct-23 A
CC3001-CO-9215-N	Excavation And Disposal Of Unsuitable Surficial Soils Within Dam Footprint	134	01-Jul-23 A	02-Oct-23 A
CC3001-CO-8420	Phase 1 Embankment - Waste rock (Zone 5 and 6) to form embankment.	100	13-Jul-23 A	02-Oct-23 A
CC3001-CO-8430	Phase 2 Embankment - Waste rock (Zone 5 and 6) to form embankment.	60	30-Jun-24*	29-Aug-24
CC3001-CO-8440	Waste rock (Zone 6) to form internal reclaim berm in TMF pond	7	29-Aug-24	05-Sep-24
CC3001-CO-8450	Form Zone 2 On Upstream Embankment Slope w. Crushed Material From Stockpile In 0.3 M Thick Lifts	45	29-Aug-24	13-Oct-24
CC3001-CO-8460	Form Zone 1 Filter/bedding Sand On Upstream Embankment Slope In 0.3 M Thick Lifts	45	29-Aug-24	13-Oct-24
CC3001-CO-8470	Supply And Install Non-woven Geotextile On Embankment Slope As Cushion For Geomembrane	30	22-Sep-24	22-Oct-24
CC3001-CO-8480	Supply & Install Geomembrane On Upstream Embankment Slope, Anchor On Dam Crest (80 Mil - 2 Mm LLDPE White, DS Textured	30	27-Sep-24	27-Oct-24
CC3001-CO-8490	Place And Compact 300 Mm Zone 5 Road Surfacing Sand And Gravel On Dam Crest	10	27-Oct-24	06-Nov-24
TMF Seepage and Run-Off Collection System		293	19-Sep-23 A	12-Jun-24
CC3001-CO-8310	Grubbing & Stripping - Seepage & Run-Off collection Area	27	19-Sep-23 A	29-Sep-23 A
CC3001-CO-8320	Collection Sump - Bulk Excavation Type 1 (Common)	15	19-Sep-23 A	05-Feb-24
CC3001-CO-8370	Excavate Seepage Collection Ditch To 1.5 M Depth With 2H:1V	5	04-Oct-23 A	14-May-24
CC3001-CO-8330	Collection Sump - Drill, Blast & Pushup (Controlled) in Rock	15	25-Oct-23 A	14-Feb-24
CC3001-CO-8340	Collection Sump - Backfill Type 1 - Common - Place & Compact	15	15-Apr-24*	29-Apr-24
CC3001-CO-8350	Supply & install Geotextile, Nonwoven, on Sump Perimeter Embankment	5	30-Apr-24	04-May-24
CC3001-CO-8360	Place Coarse Riprap Material On Side Slopes Of Sump Perimeter Embankment	6	30-Apr-24	05-May-24
CC3001-CO-8380	Supply & Install Non-woven Geotextile On Collection Ditch Base And Side Slopes	25	15-May-24	08-Jun-24
CC3001-CO-8400	Supply & Install Two Corrugated Culverts (1.2 M Diameter) At Downstream Ditch Road Crossing	3	15-May-24	17-May-24
CC3001-CO-8390	Place Coarse Riprap Material On Base And Side Slopes Of Collection Ditches	26	18-May-24	12-Jun-24
TMF - Instrumentation Installation		219	14-Sep-23 A	29-Aug-24

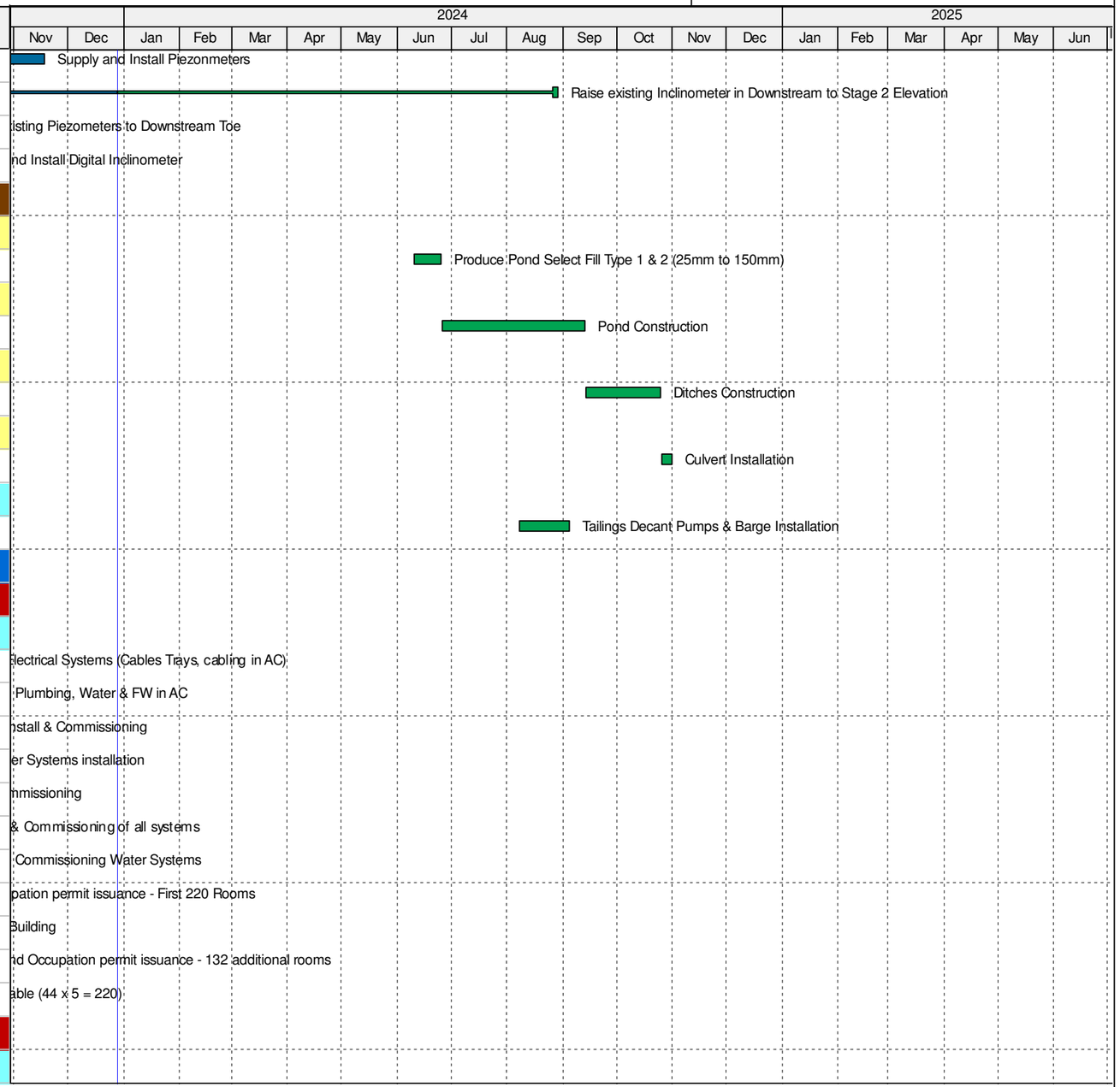


Remaining Level of Effort
Actual Level of Effort
Actual Work
Remaining Work
Critical Remaining Work
Milestone

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
CC3001-CO-8500	Supply and Install Piezonmeters	28	14-Sep-23 A	18-Nov-23 A
CC3001-CO-8530	Raise existing Inclinometer in Downstream to Stage 2 Elevation	3	18-Sep-23 A	29-Aug-24
CC3001-CO-8510	Route existing Piezometers to Downstream Toe	6	20-Sep-23 A	24-Sep-23 A
CC3001-CO-8520	Supply and Install Digital Inclinometer	5	20-Sep-23 A	24-Sep-23 A
Site Water Management		104	10-Jun-24	31-Oct-24
Process Site Water Management Materials		12	10-Jun-24	25-Jun-24
CC3001-CO-8540	Produce Pond Select Fill Type 1 & 2 (25mm to 150mm)	12	10-Jun-24	25-Jun-24
Site Water Management - Ponds		58	26-Jun-24	13-Sep-24
CC3001-CO-8550	Pond Construction	58	26-Jun-24*	13-Sep-24
Site Water Management - Ditches		42	14-Sep-24	25-Oct-24
CC3001-CO-8560	Ditches Construction	42	14-Sep-24	25-Oct-24
Haul Road Culverts		6	26-Oct-24	31-Oct-24
CC3001-CO-8570	Culvert Installation	6	26-Oct-24	31-Oct-24
3840 - Tailings Decant Barge Pumps - (to be updated)		28	07-Aug-24	04-Sep-24
CG2002-CO-0200	Tailings Decant Pumps & Barge Installation	28	07-Aug-24	04-Sep-24
3900 - Accommodation Complex		286	06-Jun-22 A	22-Sep-23 A
TK3904 - Accommodation Complex Utilities - Black & McDonald		82	13-Feb-23 A	20-Jun-23 A
Construction		82	13-Feb-23 A	20-Jun-23 A
TK3904-CO-190	Accommodation Complex - Utilities & U/G services - Electrical Systems (Cables Trays, cabling in AC)	26	13-Feb-23 A	30-Apr-23 A
TK3904-CO-235	Accommodation Complex - Utilities & U/G services - Install Plumbing, Water & FW in AC	32	01-Mar-23 A	15-Apr-23 A
TK3904-CO-195	Accommodation Complex - Utilities & U/G services - Genset Install & Commissioning	25	06-Mar-23 A	04-Apr-23 A
TK3904-CO-300	Accommodation Complex - Utilities & U/G services - Water Systems installation	14	21-Mar-23 A	21-Apr-23 A
TK3904-MS-100	Accommodation Complex - MG Tanker to provide Water for Commissioning	0	29-Mar-23 A	
TK3904-CO-215	Accommodation Complex - Final Tie-in modules & Commissioning of all systems	20	21-Apr-23 A	15-May-23 A
TK3904-CO-205	Accommodation Complex - Utilities & U/G services - Commissioning Water Systems	9	22-Apr-23 A	06-May-23 A
TK3904-CO-225	Accommodation Complex - Review and Occupation permit issuance - First 220 Rooms	15	28-Apr-23 A	26-May-23 A
TK3904-CO-245	Accommodation Complex - Touch-ups to Core Building	4	16-May-23 A	19-May-23 A
TK3904-CO-310	Accommodation Complex - Rreview and Occupation permit issuance - 132 additional rooms	15	26-May-23 A	20-Jun-23 A
TK3904-CO-200	Accommodation Complex - First Rooms available (44 x 5 = 220)	0		26-May-23 A
TK3902 - Accommodation Complex - Black & McDonald		130	23-Jan-23 A	22-Sep-23 A
Construction		130	23-Jan-23 A	22-Sep-23 A

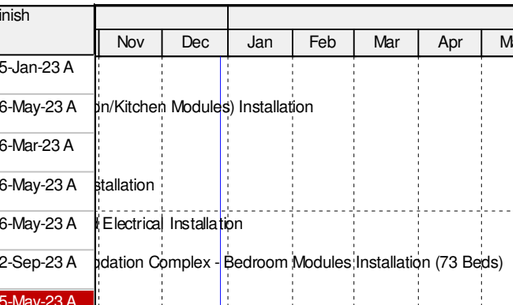


Remaining Level of Effort
Actual Level of Effort
Actual Work
Remaining Work
Critical Remaining Work
Milestone

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
TK3902-CO-120	Accommodation Complex - Mobilization - Black & McDonald	3	23-Jan-23 A	25-Jan-23 A
TK3902-CO-250	Accommodation Complex - Core Building (Recreation/Kitchen Modules) Installation	80	26-Jan-23 A	06-May-23 A
TK3902-CO-270	Accommodation Complex - Artic Corridor Installation	19	31-Jan-23 A	06-Mar-23 A
TK3902-CO-180	Accommodation Complex - Fire Protection Installation	14	17-Apr-23 A	26-May-23 A
TK3902-CO-100	Accommodation Complex - Distrib. Transformer and Electrical Installation	7	24-Apr-23 A	06-May-23 A
TK3902-CO-260	Accommodation Complex - Bedroom Modules Installation (73 Beds)	54	22-Jun-23 A	22-Sep-23 A
TK3901 - Accommodation Complex - Morris Group		234	06-Jun-22 A	15-May-23 A
Construction		234	06-Jun-22 A	15-May-23 A
TK3901-CO-250	Accommodation Complex - Refurbishment of modules	92	06-Jun-22 A	23-Sep-22 A
TK3901-CO-145	Accommodation Complex - Materials & Modules Transportation to site - Morris Group	39	17-Dec-22 A	10-Feb-23 A
TK3901-CO-150	Accommodation Complex - Mobilization - Morris Group	6	09-Jan-23 A	14-Jan-23 A
TK3901-CO-160	Accommodation Complex - Site Preparation - Building Cribs	12	11-Jan-23 A	22-Jan-23 A
TK3901-CO-270	Accommodation Complex - Dorm Modules (08 modules) Installation	47	27-Jan-23 A	14-May-23 A
TK3901-CO-260	Accommodation Complex - Mechanical & Electrical Commissioning	0	22-Apr-23 A	15-May-23 A
TK3905 - Temp. Construction Camp & Facilities - Black & McDonald		50	25-Jul-22 A	04-Oct-22 A
Construction		50	25-Jul-22 A	04-Oct-22 A
TK3905-CO-110	Temporary Construction Camp - Mobilization	1	25-Jul-22 A	25-Jul-22 A
TK3905-CO-100	Temporary Construction Camp (120 beds) - Installation & Commissioning	71	26-Jul-22 A	04-Oct-22 A
4000 - Off Site Infrastructure		721	07-Aug-21 A	26-Jun-24
4100 - Main Access Road		721	07-Aug-21 A	26-Jun-24
CC4101 - Access Roads - Temporary Roads and Maintenance Works		164	07-Aug-21 A	28-Feb-22 A
Construction		164	07-Aug-21 A	28-Feb-22 A
CC4101-CO-100	Access Road - Maintenance Works - Mobilisation	7	07-Aug-21 A	16-Aug-21 A
CC4101-CO-110	Access Road Maintenance Works	157	16-Aug-21 A	28-Feb-22 A
CC4102 - Access Roads - Upgrades		81	05-Oct-22 A	26-Nov-22 A
Construction		81	05-Oct-22 A	26-Nov-22 A
CC4102-CO100	Access Road - Upgrade Works - Mobilisation	2	05-Oct-22 A	06-Oct-22 A
CC4102-CO-010	LOE - Access Road - Upgrade Works 2022	53	05-Oct-22 A	26-Nov-22 A
CC4102-CO-100	Earthworks - Access Road Upg - Km 48 (Re-alignment)	15	06-Oct-22 A	20-Oct-22 A
CC4102-CO-120	Earthworks - Access Road Upg - Km 60 (Re-alignment + 4 culverts)	72	14-Oct-22 A	26-Nov-22 A
CC4106 - Access Roads - Upgrades 2023/2024		211	12-Sep-23 A	26-Jun-24



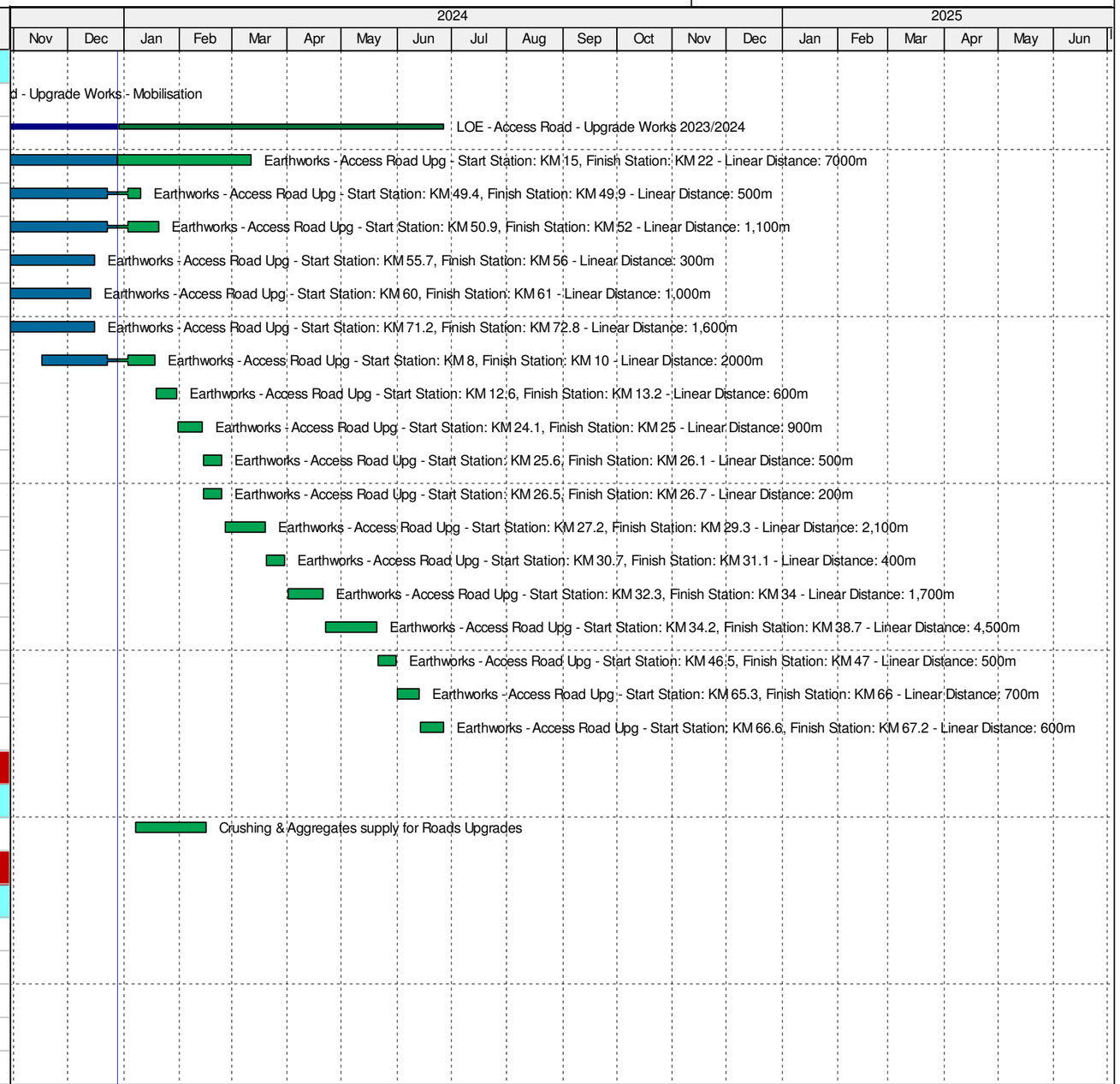
Remaining Level of Effort
Actual Level of Effort
Actual Work
Remaining Work
Critical Remaining Work
Milestone

MARATHON GOLD

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
Construction		211	12-Sep-23 A	26-Jun-24
CC4102-CO110	Access Road - Upgrade Works - Mobilisation	2	12-Sep-23 A	13-Sep-23 A
CC4102-CO-335	LOE - Access Road - Upgrade Works 2023/2024	88	12-Sep-23 A	26-Jun-24
CC4102-CO-325	Earthworks - Access Road Upg - Start Station: KM 15, Finish Station: KM 22 - Linear Distance: 7000m	36	14-Sep-23 A	11-Mar-24
CC4102-CO-265	Earthworks - Access Road Upg - Start Station: KM 49.4, Finish Station: KM 49.9 - Linear Distance: 500m	10	15-Sep-23 A	10-Jan-24
CC4102-CO-285	Earthworks - Access Road Upg - Start Station: KM 50.9, Finish Station: KM 52 - Linear Distance: 1,100m	10	17-Sep-23 A	20-Jan-24
CC4102-CO-295	Earthworks - Access Road Upg - Start Station: KM 55.7, Finish Station: KM 56 - Linear Distance: 300m	17	21-Sep-23 A	15-Dec-23 A
CC4102-CO-305	Earthworks - Access Road Upg - Start Station: KM 60, Finish Station: KM 61 - Linear Distance: 1,000m	15	21-Sep-23 A	13-Dec-23 A
CC4102-CO-315	Earthworks - Access Road Upg - Start Station: KM 71.2, Finish Station: KM 72.8 - Linear Distance: 1,600m	17	21-Sep-23 A	15-Dec-23 A
CC4102-CO-245	Earthworks - Access Road Upg - Start Station: KM 8, Finish Station: KM 10 - Linear Distance: 2000m	20	16-Nov-23 A	18-Jan-24
CC4102-CO-345	Earthworks - Access Road Upg - Start Station: KM 12.6, Finish Station: KM 13.2 - Linear Distance: 600m	10	19-Jan-24	30-Jan-24
CC4102-CO-355	Earthworks - Access Road Upg - Start Station: KM 24.1, Finish Station: KM 25 - Linear Distance: 900m	12	31-Jan-24	13-Feb-24
CC4102-CO-365	Earthworks - Access Road Upg - Start Station: KM 25.6, Finish Station: KM 26.1 - Linear Distance: 500m	10	14-Feb-24	24-Feb-24
CC4102-CO-375	Earthworks - Access Road Upg - Start Station: KM 26.5, Finish Station: KM 26.7 - Linear Distance: 200m	10	14-Feb-24	24-Feb-24
CC4102-CO-385	Earthworks - Access Road Upg - Start Station: KM 27.2, Finish Station: KM 29.3 - Linear Distance: 2,100m	20	26-Feb-24	19-Mar-24
CC4102-CO-395	Earthworks - Access Road Upg - Start Station: KM 30.7, Finish Station: KM 31.1 - Linear Distance: 400m	10	20-Mar-24	30-Mar-24
CC4102-CO-405	Earthworks - Access Road Upg - Start Station: KM 32.3, Finish Station: KM 34 - Linear Distance: 1,700m	18	01-Apr-24	20-Apr-24
CC4102-CO-415	Earthworks - Access Road Upg - Start Station: KM 34.2, Finish Station: KM 38.7 - Linear Distance: 4,500m	25	22-Apr-24	20-May-24
CC4102-CO-425	Earthworks - Access Road Upg - Start Station: KM 46.5, Finish Station: KM 47 - Linear Distance: 500m	10	21-May-24	31-May-24
CC4102-CO-435	Earthworks - Access Road Upg - Start Station: KM 65.3, Finish Station: KM 66 - Linear Distance: 700m	11	01-Jun-24	13-Jun-24
CC4102-CO-445	Earthworks - Access Road Upg - Start Station: KM 66.6, Finish Station: KM 67.2 - Linear Distance: 600m	11	14-Jun-24	26-Jun-24
SC0003 - Crushing & Aggregates Supply (45,000cm MG3)		40	07-Jan-24	15-Feb-24
Construction		40	07-Jan-24	15-Feb-24
SC0003-CO-100	Crushing & Aggregates supply for Roads Upgrades	40	07-Jan-24	15-Feb-24
CC4103 - Victoria Bridge - Upgrade Works		52	05-Oct-22 A	25-Nov-22 A
Construction		52	05-Oct-22 A	25-Nov-22 A
CC4103-CO-100	Victoria River Bridge Replacement Mobilisation	5	05-Oct-22 A	09-Oct-22 A
CC4103-CO-105	Victoria River Bridge Replacement - Preparation Works	14	07-Oct-22 A	20-Oct-22 A
CC4103-CO-010	LOE - Victoria River Bridge Replacement	50	07-Oct-22 A	25-Nov-22 A
CC4103-CO-120	Road Closure period due to Victoria Bridge works	44	13-Oct-22 A	25-Nov-22 A
CC4103-CO-110	Victoria River Bridge Replacement - Assembly & Installation of New Bridge	33	15-Oct-22 A	16-Nov-22 A

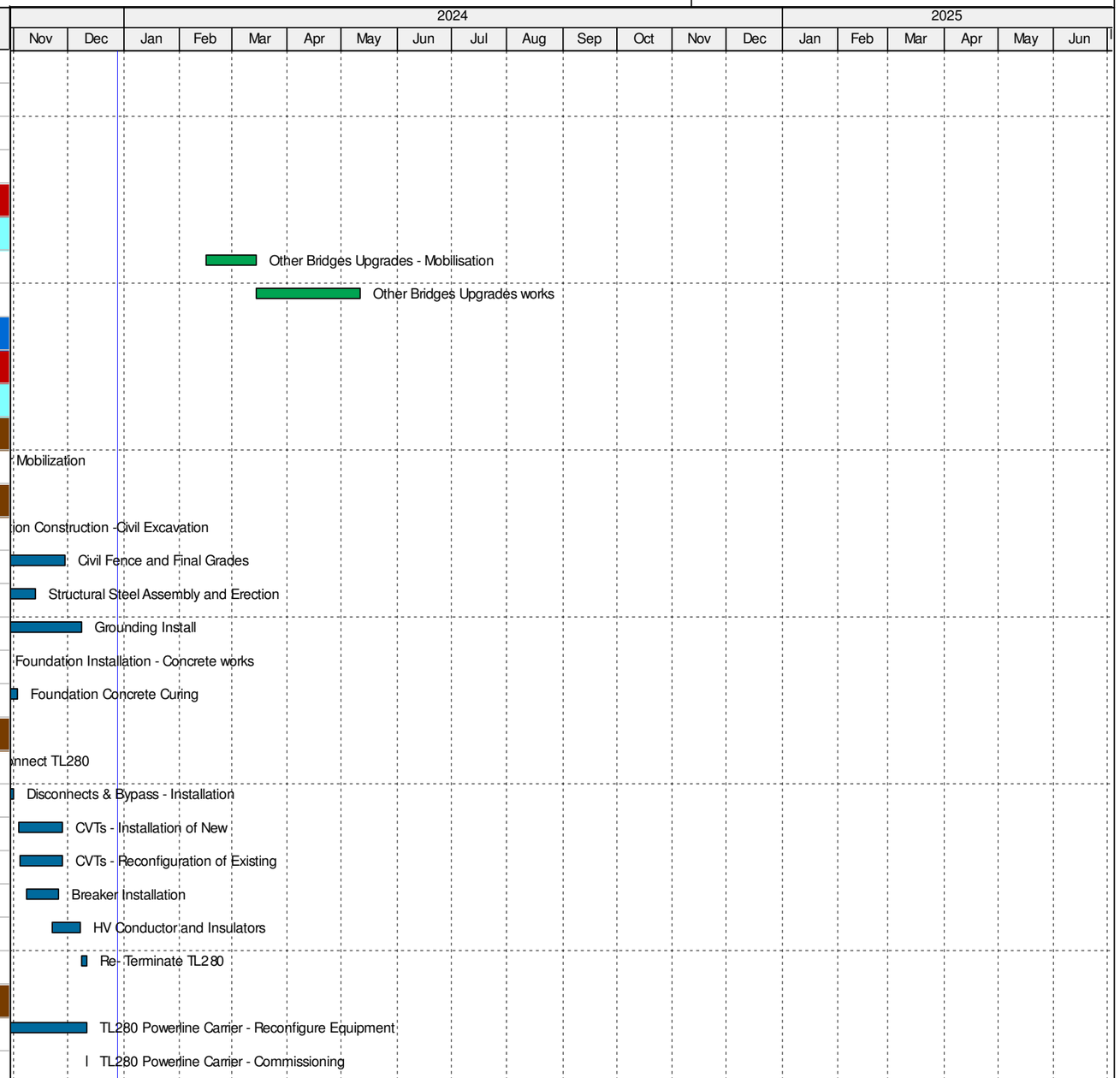


Remaining Level of Effort
Actual Level of Effort
Actual Work
Remaining Work
Critical Remaining Work
Milestone

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
CC4103-CO-107	Victoria River Bridge Replacement - Removal of Existing Bridge	12	26-Oct-22 A	06-Nov-22 A
CC4103-CO-140	Victoria River Bridge Replacement - Launch Pad Removal, Guiderail reinstall, final grading	7	15-Nov-22 A	21-Nov-22 A
CC4103-CO-150	Victoria River Bridge Replacement - Demobilization	2	24-Nov-22 A	25-Nov-22 A
CC4103-CO-130	Victoria River Bridge Replacement - Complete	0		25-Nov-22 A
CC4104 - Other Bridges - Upgrade Works (merged with CC4106)		74	15-Feb-24	11-May-24
Construction		74	15-Feb-24	11-May-24
CC4104-CO-100	Other Bridges Upgrades - Mobilisation	24	15-Feb-24	14-Mar-24
CC4104-CO-110	Other Bridges Upgrades works	50	14-Mar-24	11-May-24
4200 - HV Power Supply - by NHL Hydro - TK4201		320	03-Oct-22 A	18-Jan-24
Station		73	18-Sep-23 A	18-Jan-24
Station Construction		73	18-Sep-23 A	18-Jan-24
Contractor		7	18-Sep-23 A	20-Sep-23 A
TK4201-NH-780	Contractor Mobilization	7	18-Sep-23 A	20-Sep-23 A
Civil / Structural		36	18-Sep-23 A	08-Dec-23 A
TK4201-NH-830	Station Construction -Civil Excavation	5	18-Sep-23 A	10-Oct-23 A
TK4201-NH-870	Civil Fence and Final Grades	10	18-Sep-23 A	29-Nov-23 A
TK4201-NH-900	Structural Steel Assembly and Erection	7	06-Oct-23 A	12-Nov-23 A
TK4201-NH-860	Grounding Install	10	09-Oct-23 A	08-Dec-23 A
TK4201-NH-840	Foundation Installation - Concrete works	3	20-Oct-23 A	25-Oct-23 A
TK4201-NH-850	Foundation Concrete Curing	6	26-Oct-23 A	02-Nov-23 A
Electrical Equipment		70	06-Oct-23 A	11-Dec-23 A
TK4201-NH-890	Disconnect TL280	1	06-Oct-23 A	06-Oct-23 A
TK4201-NH-930	Disconnects & Bypass - Installation	5	27-Oct-23 A	31-Oct-23 A
TK4201-NH-950	CVTs - Installation of New	5	04-Nov-23 A	27-Nov-23 A
TK4201-NH-940	CVTs - Reconfiguration of Existing	3	04-Nov-23 A	27-Nov-23 A
TK4201-NH-920	Breaker Installation	5	08-Nov-23 A	25-Nov-23 A
TK4201-NH-960	HV Conductor and Insulators	4	22-Nov-23 A	07-Dec-23 A
TK4201-NH-970	Re- Terminate TL280	4	08-Dec-23 A	11-Dec-23 A
Communications		46	24-Oct-23 A	11-Dec-23 A
TK4201-NH-990	TL280 Powerline Carrier - Reconfigure Equipment	14	24-Oct-23 A	11-Dec-23 A
TK4201-NH-1000	TL280 Powerline Carrier - Commissioning	1	11-Dec-23 A	11-Dec-23 A

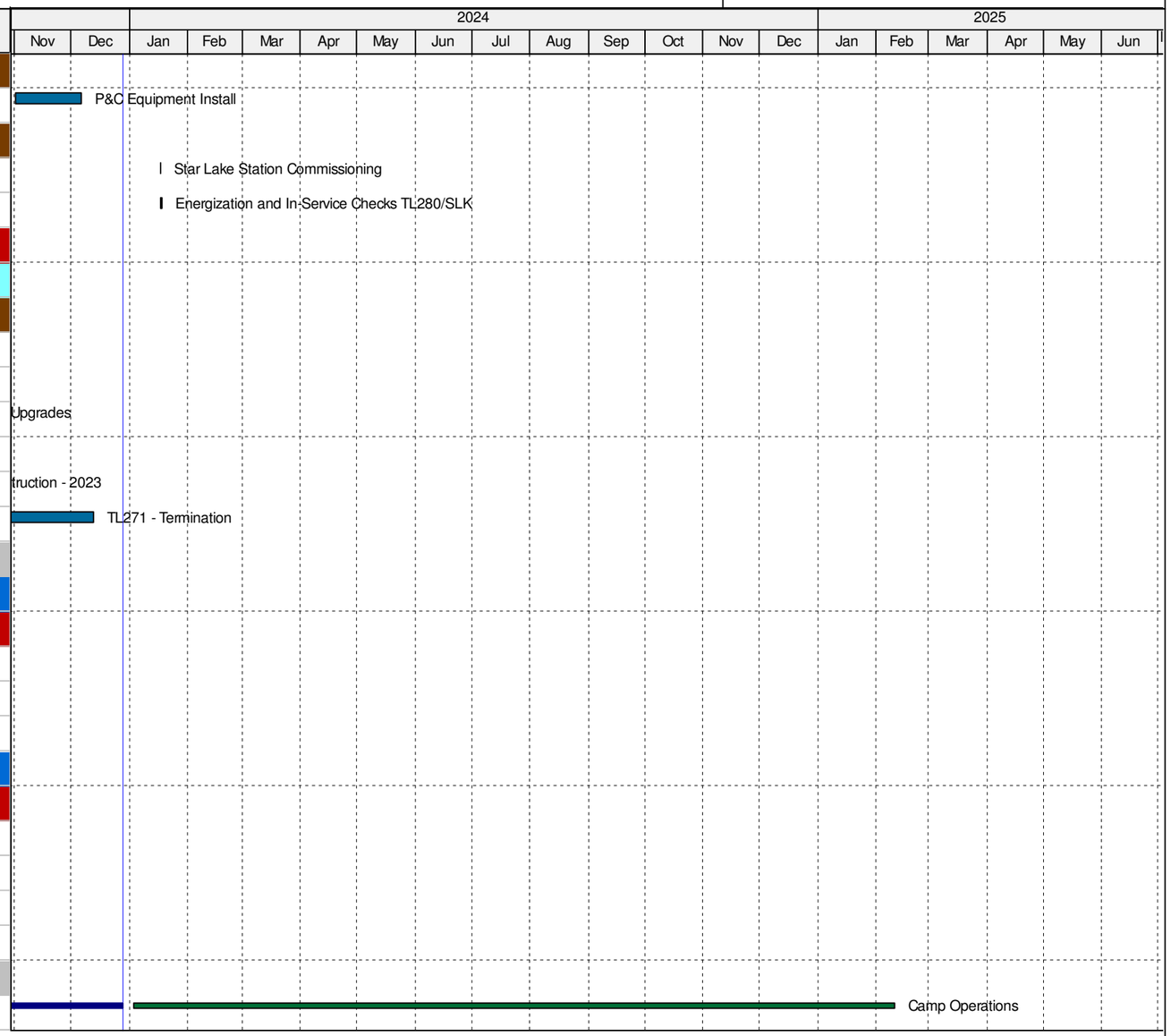


Remaining Level of Effort
Actual Level of Effort
Actual Work
Remaining Work
Critical Remaining Work
Milestone

VALENTINE PROJECT - LEVEL 2 SCHEDULE
Construction Activities

08-Feb-24 12:17
Data Date: 29-Dec-23

Activity ID	Activity Name	Original Duration	Start	Finish
P & C		16	01-Nov-23 A	06-Dec-23 A
TK4201-NH-910	P&C Equipment Install	16	01-Nov-23 A	06-Dec-23 A
Commissioning		2	17-Jan-24	18-Jan-24
TK4201-NH-1010	Star Lake Station Commissioning	1	17-Jan-24*	17-Jan-24
TK4201-NH-1020	Energization and In-Service Checks TL280/SLK	2	17-Jan-24	18-Jan-24
Transmission		230	03-Oct-22 A	12-Dec-23 A
TL271 Construction		230	03-Oct-22 A	12-Dec-23 A
Access Road & Line Clearing / Line Construction		230	03-Oct-22 A	12-Dec-23 A
TK4201-NH-760	Contractor Mobilization - 2022	12	03-Oct-22 A	14-Oct-22 A
TK4201-NH-1130	TL271 - Works 2022 - Clearing / Poles & Anchors installation	75	03-Oct-22 A	16-Dec-22 A
TK4201-NH-800	TL271 - Line Clearing and Access Road Construction/Upgrades	54	10-Jan-23 A	28-Apr-23 A
TK4201-NH-1140	TL271 - Mobilization 2023	10	10-Jan-23 A	23-Jan-23 A
TK4201-NH-820	TL271 - Line Construction - 2023	128	24-Jan-23 A	22-Aug-23 A
TK4201-NH-1030	TL271 - Termination	14	23-Aug-23 A	12-Dec-23 A
5000 - Project Indirects		161	20-Jul-22 A	12-Jan-23 A
TK5101 - Temporary Warehouse		138	17-Aug-22 A	12-Jan-23 A
Construction		138	17-Aug-22 A	12-Jan-23 A
TK5101-CO-100	Temporary Warehouse - Mobilisation	9	17-Aug-22 A	26-Aug-22 A
TK5101-CO-110	Temporary Warehouse - Complex Installation / Final Assembly on Site	108	27-Aug-22 A	12-Jan-23 A
TK5101-CO-120	Temporary Warehouse - Commissioned	0		12-Jan-23 A
CC5101 - Temporary Pads		23	20-Jul-22 A	16-Aug-22 A
Construction		23	20-Jul-22 A	16-Aug-22 A
CC5101-CO-100	Temporary Pad Construction - Mobilisation	1	20-Jul-22 A	20-Jul-22 A
CC5101-CO-120	Temporary Pad Construction - for Temporary Camp	4	20-Jul-22 A	25-Jul-22 A
CC5101-CO-110	Temporary Pad Construction - for Temporary Fuel / Fabrication Area	18	26-Jul-22 A	16-Aug-22 A
CC5101-CO-130	Temporary Pad Construction - Complete	0		16-Aug-22 A
7000 - Owner's Cost		498	26-May-23 A	10-Feb-25
SG3901-OP-100	Camp Operations	498	26-May-23 A	10-Feb-25



Remaining Level of Effort
Actual Level of Effort
Actual Work
Remaining Work
Critical Remaining Work
Milestone

Appendix D MARATHON POLICIES

Indigenous Relations Policy

Marathon Gold Corporation ("Marathon" or the "Corporation") is committed to the successful development and operation of the Valentine Gold Project (the "Project"). Our vision is an enterprise balancing commercial success with a safe working environment, effective environmental management, and the creation of lasting social benefit.

Scope of the Policy

Marathon acknowledges the unique culture and history of Indigenous Peoples in the Central Region of Newfoundland and Labrador and understands that they may have interests and concerns that differ from, or are in addition to, those of stakeholder groups. We are committed to working constructively and in a spirit of good faith with these Indigenous Peoples to achieve mutually beneficial outcomes.

Marathon's approach to engagement with Indigenous Peoples will apply over the life of the Project, including development, construction, operation, and rehabilitation.

Marathon's Indigenous Relations Policy is a living document, subject to review and modification as our business evolves and based on evolving best-practice standards for the engagement with, and participation of, Indigenous Peoples in the Canadian mining industry.

Marathon's Commitments

Marathon's Values inform and guide the development of measures to (1) protect the natural environment; (2) minimize cultural and social impacts on communities and Indigenous Peoples; and, (3) enhance socio-economic benefits for all stakeholders. We recognize that the success of our enterprise includes the successful participation of Indigenous people in employment and contracting opportunities at all stages of the Project's life.

Marathon acknowledges these responsibilities through the following measures:

- Acknowledgement of potential or established Indigenous or treaty rights and compliance with the requirements of any applicable treaties, laws, and regulations;
- Protection of cultural and heritage sites;

- Provision of opportunities for Indigenous Peoples to share traditional knowledge and information on land and resource use in the Project area;
- Consideration of traditional knowledge and land and resource use information in the identification and assessment of Project effects;
- Working cooperatively with Indigenous Peoples to identify Project effects and develop and implement appropriate mitigation measures;
- Working cooperatively with Indigenous Peoples to identify and manage environmental risks and opportunities as part of Project planning and execution;
- Integration of traditional knowledge and land and resource use information into the Project decision-making process as appropriate;
- Provision of opportunities for Indigenous Peoples to participate in the Project through employment and/or the supply of goods and services;
- Working cooperatively with Indigenous Peoples to identify and remove barriers to the participation of Indigenous people in the Project; and,
- Implementation of an effective, respectful and meaningful engagement which:
  - Provides accurate and relevant Project information in a timely and culturally appropriate manner;
  - Provides sufficient opportunities to identify issues and concerns; and,
  - Enables consideration of, and response to, Indigenous issues and concerns.

Marathon will maintain constructive dialogue with Indigenous Peoples to ensure that their views are taken into consideration as the Project progresses. We recognize that Indigenous interests and activities in relation to the Project may evolve with time, and we acknowledge the need to conduct ongoing assessment of the impact of the Project on Indigenous people.

Community Relations Policy

Marathon Gold Corporation ("Marathon" or the "Corporation") is committed to the successful development and operation of the Valentine Gold Project (the "Project"). Our vision is an enterprise balancing commercial success with a safe working environment, effective environmental management, and the creation of lasting social benefit.

Scope of the Policy

Marathon Gold understands that exploration and mining activity can bring positive social and economic benefits to communities and regions when potential environmental and socio-economic impacts are understood and well-managed.

We believe that effective management of potential environmental and socio-economic impacts is best achieved through listening, collaboration and cooperation with communities and stakeholders. We are committed to meaningful and ongoing community engagement. Early development of constructive relationships with local communities based on respectful dialogue with community leaders and residents is critical to responsible development and will help to ensure our projects are sustainable and successful in all aspects.

Marathon's Commitments

Marathon acknowledges that it is responsible, together with government and other partners, to mitigate the adverse impacts of our operations and to maximize local benefits. Marathon's Values inform and guide an approach to engagement that acknowledges, considers, and responds to the concerns of people and their communities. Through engagement we will:

- Acknowledge that our business fundamentally impacts people and communities;
- Acknowledge that people and communities existed on the land before our business commenced, and will exist after our business has ceased;
- Work proactively with communities to identify and manage risks and opportunities and achieve long-term, mutual success;
- Deal with communities in an inclusive, transparent, culturally appropriate manner;

- Maintain open and honest lines of two-way communication so that communities are provided with the necessary information, including information relating to our environmental performance and employment and business opportunities, on an ongoing basis;
- Collaborate with communities to prevent or mitigate adverse effects and promote responsible social and economic development;
- Take the values, needs and priorities of communities into account in our planning and decision-making processes;
- Seek to maximise employment and contracting opportunities within local communities;
- Recognize local community business capacities when formulating procurement packages;
- Work with communities to foster community health and well-being through a program of investment and sponsorship that leaves a lasting, positive legacy;
- Continually assess and seek improvement of our community relations; and,
- Formalize our commitments with local communities through cooperation or partnership agreements.

Effective community communication and engagement is critical to obtaining and preserving our social licence to operate. Building community trust and support is a normal part of the way we do business. We are committed to working with local communities to develop projects which create value for our stakeholders and shareholders.

Marathon's Community Relations Policy is a living document, subject to review and modification as our business evolves and based on evolving best-practice standards for community and stakeholder engagement in the Canadian mining industry.

MARATHON GOLD

HUMAN RIGHTS POLICY

Marathon Gold Corporation ("Marathon" or the "Corporation") is committed to the responsible development and operation of the Valentine Gold Project (the "Project"). Our vision is an enterprise balancing commercial success with a safe working environment, effective environmental management and the creation of lasting social benefit. of its assets to minimize harm and maximize benefits to its employees and all affected stakeholders. We strive to be a good corporate citizen, local partner, safety leader and best-in-class employer.

Consistent with its corporate values of Respect, Accountability, Transparency, Inclusion and Respect, Marathon Gold is committed to integrating human rights into all aspects of our operations and decision-making processes in order to conduct business in a manner that respects the equality, rights and dignity of all people. This policy will apply at every level of the organization to all employees, contractors as well as independent service providers and visitors attending Marathon's workplaces. We will also aim to identify and work with partners who conduct their businesses consistent with this policy and we will implement practices to evaluate suppliers, consultants and contractors based on this policy.

This policy should be read in conjunction with other relevant company policies including:

- Workplace Violence, Harassment & Discrimination
- Respectful Workplace Policy
- Employee Issues Resolution
- Employee Information Protection
- Code of Conduct
- Whistleblower Policy and Reporting
- Diversity Policy
- Indigenous Relations Policy

Consistent with international and domestic human rights standards and associated corporate policies, Marathon Gold recognizes that employees, contractors, and suppliers are entitled to work in an environment and under conditions that are safe and which respect their rights and dignity. Marathon does not tolerate child labour, prison labour and forced labour, slavery, and servitude. Marathon does not tolerate or condone discrimination against any individual or group on the basis of race, colour, gender, gender orientation or gender identity, ethnic affiliation, religion, social origin, family status, disability or political opinion. It respects the right of workers to join or refrain from joining legally authorized associations or organizations, including unions.

As part of its commitment to human rights, Marathon will:

- Treat employees fairly and without harassment or discrimination on the basis of race, colour, gender, gender orientation or gender identity, ethnic affiliation, religion, social origin, family status, disability, or political opinion
- Promote gender equity, diversity, and inclusion in the workplace

- Consider the safety and wellbeing of all employees, contractors, and stakeholders as a priority and protect the safety of those who work at or visit our worksites by taking necessary actions to prevent work-related risks and health hazards
- Operate in full compliance with applicable wage, hours of work, overtime and benefits legislation
- Implement an employee grievance mechanism to address issues related to harassment and discrimination and guarantee freedom from reprisals and retaliation for whistleblowers and complainants
- Reject any form of slavery, forced labour and child labour and recognize the rights of employees to engage in freedom of association and collective bargaining
- Enter into contractual arrangements that encourage the adherence of suppliers and contractors to our human rights commitments
- Acknowledge and respect Indigenous people's land and resource use, cultural values and traditions
- Respect the human rights of stakeholders and provide an accessible and transparent stakeholder grievance mechanism to resolve issues in a timely and effective manner
- Communicate this policy and our commitment to human rights to all stakeholders, including employees, contractors, and suppliers and those working within our supply chains and provide human rights training to all employees
- Conduct reasonable human rights due diligence to determine the potential human rights impacts of its operations both at the worksite and in communities and implement reasonable measures to mitigate such impacts
- Communicate procedures and processes respecting the reporting and investigation of human rights violations to employees
- Track and monitor reports of human rights violations and as necessary conduct audits for human rights compliance to ensure that the terms of this policy and related policies and procedures are being met
- Disclose our performance annually in our Sustainability Report

Diversity and Inclusivity Policy

Marathon Gold Corporation ("Marathon" or the "Corporation") is committed to the successful development and operation of the Valentine Gold Project (the "Project"). Our vision is an enterprise balancing commercial success with a safe working environment, effective environmental management, and the creation of lasting social benefit.

Marathon seeks to foster a diverse and inclusive corporate culture that acknowledges and values difference. Our workplaces shall reflect the business environment and geographic locations in which we operate, where all employees, regardless of age, gender, beliefs, language, race, ethnicity, Indigenous identity or physical abilities, are appreciated and respected for the talent and knowledge they bring to the Corporation.

Marathon understands that the inclusion of diverse ideas, talents, skills and perspectives at all levels within the workforce promotes creativity and thought-provoking discussions and solutions. Maintaining a corporate culture where all voices and points of views are heard and considered builds a stronger, more representative, engaged and competitive workforce.

Marathon recognizes that barriers to creating a diverse and inclusive workplace are common, and can be promulgated through indifference in leadership or systemic bias. We are committed to identifying and removing barriers wherever they exist. Our commitment to diversity and inclusion is reflected in all levels of the company, beginning with our Board of Directors and executive team.

We aim for a workforce which is comprised of talented and dedicated individuals who bring a wide mix of knowledge, expertise, experience, skills and backgrounds to their positions and to the team. Our employee selection and advancement processes will be founded on Marathon's Values. They will be equitable, non-discriminatory and free from bias, conscious or unconscious.

We consider all individuals based on merit, having due regard to the benefits of diversity and corporate needs and priorities.

DIVERSITY AND INCLUSIVITY POLICY

Marathon's commitment to diversity and inclusion aligns with our core corporate Values and is explicitly reflected in our Indigenous Relations Policy and Community Relations Policy. It informs our strategic planning and is incorporated into all aspects of our corporate structure.

Marathon's Diversity and Inclusivity Policy is a living document, subject to review and modification as our business evolves and based on evolving best-practice standards for human resource development in the Canadian workplace.