



**Blackwater
Mine**

February 20, 2026

Re: Aboriginal Group Monitor and Monitoring Plan D.1 – LDN-UFN – Redaction

For your reference, the appendices listed in the Table of Contents of the Aboriginal Group Monitor and Monitoring Plan have been redacted. These appendices are specific to each Nation and have been removed to ensure that Nation-specific information is not included in this consolidated version of the Plan.



Blackwater
Mine

Blackwater Gold Project

Aboriginal Group Monitor and Monitoring Plan

January 2023

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ACRONYMS AND ABBREVIATIONS

Aboriginal Groups or Indigenous nations	Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Saik'uz First Nation, Stelat'en First Nation and Nazko First Nation (as defined in the Project's Environmental Assessment Certificate M#19-01)
AGMMP	Aboriginal Group Monitor and Monitoring Plan
ACHRMP	Archaeological and Cultural Heritage Resource Management Plan
APEGBC	Association of Professional Engineers and Geoscientists of British Columbia
Artemis	Artemis Gold Inc.
AGMMP	Aboriginal Group Monitor and Monitoring Plan
BC	British Columbia
Blackwater or the Project	Blackwater Gold Project
BW Gold	BW Gold LTD.
C&E	Compliance and Enforcement
C&M	Care and maintenance
CEO	Chief Executive Officer
CM	Construction Manager
COO	Chief Operating Officer
CSFN	Carrier Sekani First Nations
DS	Decision Statement
EAC or Certificate	Environmental Assessment Certificate
EAO	Environmental Assessment Office
EM	Environmental Manager
EMC	Environmental Monitoring Committee
EMS	Environmental Management System
EPCM	Engineering, Procurement and Construction Management
FSR	Forest Service Road
GM	General Manager
IEM	Independent Environmental Monitor
km	kilometre

LDN	Lhoosk'uz Dené Nation
Mtpa	million tonnes per annum
New Gold	New Gold Inc.
NFN	Nazko First Nation
NWFN	Nadleh Whut'en First Nation
PPE	Personal protective equipment
t	tonnes
SFN	Saik'uz First Nation
StFN	Stellat'en First Nation
ToE	Terms of Engagement
TSF	Tailings Storage Facility
UFN	Ulkatcho First Nation
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples
VP	Vice President
WMMP	Wildlife Mitigation and Monitoring Plan

1. PROJECT OVERVIEW

The Blackwater Gold Project (the Project) is a gold and silver open pit mine located in central British Columbia (BC), approximately 112 kilometres (km) southwest of Vanderhoof, 160 km southwest of Prince George, and 446 km northeast of Vancouver, British Columbia (BC). The Project site is presently accessed via the Kluskus Forest Service Road (FSR), the Kluskus-Ootsa FSR and an exploration access road, which connects to the Kluskus-Ootsa FSR at km 142. The Kluskus FSR joins Highway 16 approximately 10 km west of Vanderhoof. A new, approximately 16 km road will be built to replace the existing exploration access road, which will be decommissioned. The new planned access is at km 124.5. Driving time from Vanderhoof to the mine site is about 2.5 hours.

Major mine components include a tailings storage facility (TSF), ore processing facilities, waste rock, overburden and soil stockpiles, borrow areas and quarries, water management infrastructure, water treatment plants, accommodation camps and ancillary facilities. The gold and silver will be recovered into a gold-silver doré product and shipped by air and/or transported by road. Electrical power will be supplied by a new approximately 135 km, 230 kilovolt (kV) overland transmission line that will connect to the BC Hydro grid at the Glenannan substation located near the Endako mine, 65 km west of Vanderhoof.

The Blackwater mine site is located within the traditional territories of Lhoosk'uz Dené Nation (LDN), Ulkatcho First Nation (UFN), Skin Tyee Nation and Tsilhqot'in Nation. The Kluskus and Kluskus-Ootsa FSRs and Project transmission line cross the traditional territories of Nadleh Whut'en First Nation (NWFN), Saik'uz First Nation (SFN), and Stelat'en First Nation (StFN; collectively, the Carrier Sekani First Nations [CSFNs]) as well as the traditional territories of the Nazko First Nation (NFN), Nee-Tahi-Buhn Band, Cheslatta Carrier Nation and Yekooche First Nation (BC EAO 2019a, 2019b).

Project construction is anticipated to take two years. Mine development will be phased with an initial milling capacity of 15,000 tonnes per day (t/d) or 5.5 million tonnes per annum (Mtpa) for the first five years of operation. After the first five years, the milling capacity will increase to 33,000 t/d (or 12 Mtpa) for the next five-years, and to 55,000 t/d (or 20 Mtpa) in Year 11 until the end of the 23 year mine life. The closure phase is 24 to approximately 45 years, subject to the Open Pit has filled and the TSF is allowed to passively discharge to Davidson Creek, and the Post-closure phase is 46+ years.

New Gold Inc. (New Gold) received Environmental Assessment Certificate #M19-01 (EAC) on June 21, 2019 under the 2002 *Environmental Assessment Act* (BC EAO 2019c) and a Decision Statement (DS) on April 15, 2019 under the *Canadian Environmental Assessment Act, 2012* (CEA Agency 2019). In August 2020, Artemis Gold Inc. (Artemis) acquired the mineral tenures, assets and rights in the Blackwater Project that were previously held by New Gold Inc. On August 7, 2020, the Certificate was transferred to BW Gold LTD. (BW Gold), a wholly-owned subsidiary of Artemis, under the 2018 *Environmental Assessment Act*. The Impact Assessment Agency of Canada notified BW Gold on September 25, 2020 to verify that written notice had been provided within 30 days of the change of proponent as required in Condition 2.16 of the DS, and that a process had been initiated to amend the DS.

2. PURPOSE AND OBJECTIVES

The purpose of the Aboriginal Group Monitor and Monitoring Plan (AGMMP) is to describe BW Gold's approach to identify, recruit and retain Aboriginal Monitors.

The plan objectives are to:

- Identify the scope of the Monitor's activities related to monitoring for potential effects of the Project on that Aboriginal Group's Aboriginal Interests, which include asserted or determined Aboriginal rights, including title or treaty rights.
- Provide terms of engagement (ToE) for Aboriginal Monitors that focus on the potential effects from the Project on Aboriginal Group's Aboriginal Interests.

The AGMMP applies to all Aboriginal Groups.¹ Separate ToE have been developed for LDN and UFN, CSFNs, and NFN, and tailored to reflect the scope of their monitoring based on potential effects of the Project on Aboriginal Interests. The ToE are appended to Aboriginal Group-specific versions of the AGMMP. The Monitors are intended to be integrated with BW Gold's environmental team and fulfill a role consistent with that of an Environmental Monitor, with additional focus on values raised by Aboriginal Groups as described in their ToE. The Monitors and the EM will work to coordinate and streamline monitoring and reporting to achieve efficiency and avoid duplicative monitoring, where practicable.

The AGMMP is required by EAC Condition 16.

2.1 Linkages to Other Management and Monitoring Plans

Aboriginal Monitors will participate in environmental monitoring associated with a number of management and monitoring plans, which are summarized in Appendix C. The scope of monitoring by Aboriginal Monitors will be determined in consultation with each Aboriginal Group based on the potential effects of the Project on Aboriginal Interests. Plans not captured in Appendix C but relevant to AGMMP include:

- EAC Condition 12 (Independent Environmental Monitor), which provides ToE for retaining independent environmental monitors throughout construction, operations, closure and post-closure; and
- EAC Condition 16 (Aboriginal Engagement Plan), which identifies how BW Gold will engage with each Aboriginal Group on the development and implementation of the requirements of the Certificate, and updates to Certificate plans, programs or other documents.

Additionally, there are environmental and cultural heritage resource plans related to the AGMMP as the monitors will be involved in the implementation of these plans. The relevant plans are listed in a table that is appended to the ToE that have been developed for LDN and UFN, CSFNs, and NFN.

¹ Aboriginal Groups, as defined in the Project's Environmental Assessment Certificate M#19-01 include: Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Saik'uz First Nation, Stelat'en First Nation and Nazko First Nation.

3. ROLES AND RESPONSIBILITIES

BW Gold has the obligation of ensuring that all commitments are met and that all relevant obligations are made known to mine personnel and site contractors during all phases of the mine life. A clear understanding of the roles, responsibilities, and level of authority that employees and contractors have when working at the mine site is essential to meet Environmental Management System (EMS) objectives.

Table 3-1 provides an overview of general environmental management responsibilities during all phases of the mine life for key positions that will be involved in environmental management. Other positions not specifically listed in Table 3-1 but who will provide supporting roles include independent environmental monitors, Independent Tailings Review Board, TSF qualified person, and other qualified persons and professionals. Details on the roles and responsibilities of Aboriginal Monitors will be determined during discussions on the ToE in Appendix D.

Table 3-1: Blackwater Gold Roles and Responsibilities

Position	Responsibility
Chief Executive Officer (CEO)	The CEO is responsible for overall Project governance. Reports to Board.
Chief Operating Officer (COO)	The COO is responsible for engineering and Project development and coordinates with the Mine Manager to ensure overall Project objectives are being managed. Reports to CEO.
General Manager (GM) Development	The GM is responsible for managing project permitting, the Project's administration services and external entities, and delivering systems and programs that ensure Artemis's values are embraced and supported, Putting People First, Outstanding Corporate Citizenship, High Performance Culture and Rigorous Project Management and Financial Discipline. Reports to COO.
Vice President (VP) Environment & Social Responsibility	The VP Environment & Social Responsibility is responsible for championing the Environmental Policy Statement and EMS, establishing environmental performance targets and overseeing permitting. Reports to COO.
Mine Manager	The Mine Manager, as defined in the <i>Mines Act</i> , has overall responsibility for mine operations, including the health and safety of workers and the public, Environmental Management System (EMS) implementation, overall environmental performance and protection, and permit compliance. The Mine Manager may delegate their responsibilities to qualified personnel. Reports to GM.
Construction Manager (CM)	The CM is accountable for ensuring environmental and regulatory commitments/ and obligations are being met during the construction phase. Reports to GM.
Environmental Manager (EM)	The EM is responsible for the day-to-day management of the Project's environmental programs and compliance with environmental permits, updating EMS and MPs. The EM or designate will be responsible for reporting non-compliance to the CM, and Engineering, Procurement and Construction Management (EPCM) contractor, other contractors, the Company and regulatory agencies, where required. Supports the CM and reports to Mine Manager.
Departmental Managers	Departmental managers are responsible for implementation of the EMS relevant to their areas. Report to Mine Manager.
Indigenous Relations Manager	Indigenous Relations Manager is responsible for Indigenous engagement throughout the life of mine. Also responsible for day-to-day management and communications with Indigenous groups. Reports to VP, Environment & Social Responsibility.

Position	Responsibility
Community Relations Advisor	Community Relations Advisor is responsible for managing the Community Liaison Committee and Community Feedback Mechanism. Reports to Indigenous Relations Manager.
Environmental Monitors	Environmental Monitors (includes Environmental Specialists and Technicians) are responsible for tracking and reporting on environmental permit obligations through field-based monitoring programs. Report to EM.
Aboriginal Monitors	Aboriginal Monitors are required by EAC #M19-01 Condition 17 and will be responsible for monitoring the Project's potential effects on Aboriginal interests. Aboriginal Monitors will be involved in adaptive management and follow-up monitoring programs. Report to EM and will also have lines of communication to the Indigenous Relations Manager and their Aboriginal Group.
Employees and Contractors	Employees are responsible for being aware of permit requirements specific to their roles and responsibilities. Report to Departmental Managers.
Qualified Professionals or Qualified Persons	Qualified professionals and qualified persons will be retained to review objectives and conduct various aspects of the Project's environmental and social monitoring as specified in EMPs and social management plans.

BW Gold will employ a qualified person as an EM who will ensure that throughout the Construction phase the EMS requirements are established, implemented and maintained, and that environmental performance is reported to management for review and action. The EM is responsible for retaining the services of qualified persons or qualified professionals with specific scientific or engineering expertise to provide direction and management advice in their areas of specialization. The EM will be supported by Environmental Monitors that will include Environmental Specialists and Technicians and a consulting team of subject matter experts in the fields of environmental science and engineering.

During the Construction phase, the EPCM contractor and sub contractors, will report to the BW Gold CM. The EPCM contractor will be responsible for ensuring that impacts are minimized, and environmental obligations are met during the construction phase. For non-EPCM contractors, who will perform some of the minor works on site, the same reporting structure, requirements, and responsibilities will be established as outlined above. BW Gold will maintain overall responsibility for management of the construction and operation of the mine site, and will therefore be responsible for establishing employment and contract agreements, communicating environmental requirements, and conducting periodic reviews of performance against stated requirements.

The CM is accountable for ensuring that environmental and regulatory commitments/obligations are being met during the construction phase. The EM will be responsible for ensuring that construction activities are proceeding in accordance with the objectives of the EMS and associated MPs. The EM or designate will be responsible for reporting non-compliance to the CM, and EPCM contractor, other contractors, the Company and regulatory agencies, where required. The EM or designate will have the authority to stop any construction activity that is deemed to pose a risk to the environment; work will only proceed when the identified risk has been addressed and concerns rectified.

Environmental management during operation of the Project will be integrated under the direction of the EM, who will liaise closely with Departmental managers and will report directly to the Mine Manager. The EM will be supported by the VP Environment and Social Responsibility in order to provide an effective and integrated approach to environmental management and ensure adherence to corporate environmental standards. The EM will be accountable for implementing the approved MPs and reviewing them periodically for effectiveness. Departmental Managers (e.g., mining, milling, and plant/site services) will be directly responsible for implementation of the EMS and MPs and standard operating procedures

relevant to their areas. All employees and contractors are responsible for daily implementation of the practices and policies contained in the EMS.

During closure and post-closure staffing levels will be reduced to align with the level of activity associated with these phases. Prior to initiating closure activities, BW Gold will revisit environmental and health and safety roles and responsibilities to ensure the site is adequately resourced to meet permit monitoring and reporting. The Mine Manager will maintain overall responsibility for management of Closure and Post-closure activities.

Pursuant to Condition 19 of the Project's EAC #M19-01, BW Gold has established an Environmental Monitoring Committee (EMC) to facilitate information sharing and provide advice on the development and operation of the Project, and the implementation of EAC conditions, in a coordinated and collaborative manner. Committee members include representatives of the Environmental Assessment Office (EAO), UFN, LDN, NWFN, StFN, SFN, NFN, Ministry of Energy, Mines and Low Carbon Innovation, ENV and Ministry of Forests, Lands, Natural Resource Operations and Rural Development.

4. COMPLIANCE OBLIGATIONS, GUIDELINES, AND BEST MANAGEMENT PRACTICES

4.1 Legislation

Federal legislation applicable to the AGMMP includes.

- *Impact Assessment Act*; and
- *United Nations Declaration on the Rights of Indigenous Peoples Act*.

Provincial legislation applicable to the AGMMP includes.

- *Declaration on the Rights of Indigenous Peoples Act*; and
- *Environmental Assessment Act*.

4.2 Environmental Assessment Office and Federal Decision Statement Conditions

The AGMMP is required by EAC Condition 17. Condition 3 (Adaptive Management) does not apply to the AGMMP as Condition 17 does not require monitoring or the implementation of mitigation measures. A concordance table identifying where the EAC Condition 17 requirements are located in the plan is provided in Appendix A.

There are no federal DS conditions requiring Aboriginal Monitors.

4.3 Existing Permits

LDN and UFN Aboriginal Monitors will be involved in monitoring during the Early Works.

4.4 Guidelines and Best Management Practices

There is no specific guidance related to Aboriginal Monitors or monitoring. The EAO's Compliance and Enforcement Policy and Procedures (Version 1.1; EAO 2020) describe their compliance and enforcement policy and procedures and how the EAO works with independent environmental monitors (IEMs) and Indigenous groups. It is expected that input provided by Aboriginal Groups on the AGMMP throughout its implementation will inform best practices.

5. CONTEXT

5.1 Overview of Project Interactions with Aboriginal Groups

Table 5-1 summarizes the Project components and activities that will potentially interact with the Aboriginal Groups' Traditional Territories (Appendix B) and provides the context for the potential effects of the Project on Aboriginal Interests.

Table 5-1: Project Components and Activities and Potential Interaction with Aboriginal Group Traditional Territories

Project Components and Activities	LDN	UFN	SFN	StFN	NWFN	NFN
Mine site components and associated activities	●	●				
Airstrip and airstrip access road	●	●				
Freshwater supply system, water supply pipeline and service road	●		●			
Tatelkuz Lake water withdrawal	●		●			
Mine discharges (air, treated effluent)	●	●	●	●	●	
Component footprints causing changes to water flows	●	●	●			
Mine Access Road	●	●				
Project use of Kluskus FSR	●		●		●	●
Project use of Kluskus-Ootsa FSR	●	●	●			●
Transmission Line (construction and maintenance)	●	●	●	●	●	

5.2 Aboriginal Values and Monitoring Protocols

Each Aboriginal Group is responsible for providing direction to their monitor on the values of importance for monitoring. This may be done through verbal and written communications, and reviewed annually. This direction will provide the foundation for the development of an annual conceptual monitoring plan (described in the ToE in Appendix D) by the Aboriginal Monitor, which will be shared with their Aboriginal Group and BW Gold. BW Gold will utilize this understanding of Aboriginal values of importance in training and engagement with employees and contractors, and update those programs accordingly.

BW Gold's understanding of values of importance to each Aboriginal Group for monitoring is set out in the ToE (Appendix D).

6. IDENTIFICATION AND RETENTION OF ABORIGINAL MONITORS

6.1 Identifying an Aboriginal Monitor

BW Gold will work with Aboriginal Groups to identify their Aboriginal Monitor by providing a job description. The monitor must be approved by the Aboriginal Group and BW Gold, unless otherwise authorized by EAO.

Any Aboriginal Group may notify BW Gold and EAO in writing if they wish to have the same monitor as another Aboriginal Group act as their monitor, rather than each having separate monitors. In this case, the Aboriginal Group will provide, in writing, the time-period or Project phase over which the shared monitor would be in place. In this case, BW Gold will communicate and confirm with the Aboriginal Groups who are sharing a monitor regarding administrative aspects of the role.

6.2 Aboriginal Monitor Job Description

BW Gold will develop a job description for the Aboriginal Monitor role (Appendices D-5 and D-6). The job description will be used by BW Gold for those monitors retained directly by BW Gold or those contracted through the Aboriginal Group. The job description will include, at a minimum an overview of the Project, the Aboriginal Monitor role and responsibilities and expectations for the role based on the ToE. The job description will also reflect BW Gold's policies, procedures, site access requirements and will provide information on desired experience and qualifications, hours or work, shift rotation and other information consistent with a job description. Ideally potential candidates should have experience in environmental or cultural resource protection, in accordance with the responsibilities outlined in the ToE.

The job description will also outline conditions for working at a mine that must be met in accordance with the *Mines Act*. In accordance with the Act, the Mine Manager is responsible for project activities, including site access. The Mine Manager has overall responsibility for mine operations, including the health and safety of workers and the public. The Mine Manager has the authority to assess the fitness for work of all people accessing the site, including Aboriginal Monitors, and will consider their qualifications to undertake the work, based on their knowledge, training and experience and capability of identifying any potential or actual danger to health and safety in the workplace. Fitness for work will be a requirement for site access and the Aboriginal Monitor role more generally. The Mine Manager will decide whether an Aboriginal Monitor meets the requirements of the job description and can fulfill the role.

All Aboriginal Monitors will abide by BW Gold policies while conducting monitoring activities. These requirements will be set out in the Monitor's employment agreement or contractual agreement, as appropriate.

6.3 Retaining Monitors

To initiate discussions on monitor retention, BW Gold will provide the job description (section 6.2) to the Aboriginal Group at least 30 days prior to commencing construction within the Aboriginal Group's Traditional Territory. The job description will be provided by email unless otherwise requested by the Aboriginal Group.

Thirty days prior to commencing construction within an Aboriginal Group's Traditional Territory, BW Gold will inquire as to whether the Aboriginal Group prefers that the Aboriginal monitor be retained by BW Gold or by the Aboriginal Group. If at any time an Aboriginal Group decides to change their preference for retaining a monitor, a minimum of 90 days notice is required to allow time for BW Gold to make other arrangements. A change of retention preference notice must be made in writing by the Aboriginal Group to BW Gold.

In the event of a termination or resignation (either of an employee or contract Aboriginal Monitor), there may be a period in which there is no Aboriginal Monitor from the applicable Aboriginal Group. In this case, BW Gold will provide the job description to the Aboriginal Group within 7 days of the termination or resignation to commence the recruiting process. Changes to the job description will be discussed with Aboriginal Groups prior to finalizing the job description.

BW Gold will not be out of compliance with the retention aspects of EAC Condition 17 provided it has followed the process set out in this plan for retaining monitors. Aboriginal Monitors will be retained through the Construction, Operations and Closure phases of the mine.

6.3.1 Monitors Retained by BW Gold

For Aboriginal Monitors retained by BW Gold, BW Gold will work with each Aboriginal Group to recruit the monitor. BW Gold will provide the job description to the Aboriginal Group and ask the Aboriginal Group to identify potential monitors and to provide their CVs. BW Gold will consider the advice of the Aboriginal Group in advertising for the role.

BW Gold will be responsible for interviewing the candidates and retaining suitable monitors. BW Gold will invite an Aboriginal Group representative to participate in the interview BW Gold will have the discretion to determine suitability of potential candidates for the role and retain final decision on hiring. If a Monitor retained by BW Gold needs to be replaced, BW Gold will work with the Aboriginal Group to identify and recruit a new monitor following the process set out above. If no suitable monitor candidates are identified by the Aboriginal Group, BW Gold will follow up with the Aboriginal Group on a monthly basis to check to see if any new candidates are available until such time as a monitor from that Aboriginal Group is found or is no longer needed, or is directed in writing otherwise by the Aboriginal Group.

Applicants for the Aboriginal Monitor position will have to pass pre-employment screening testing in order to be appointed to the position, which includes alcohol and drugs, medical and fitness testing, as well as a criminal background check. The pre-employment screening is a regular part of the BW Gold recruitment process. BW Gold intends to implement a vaccination policy. If this policy takes place prior to an Aboriginal Monitor starting, they will have to be in compliance with BW Gold's vaccination policy, as well as all other applicable policies and procedures.

6.3.2 Monitors Retained by Aboriginal Groups

For Monitors retained by an Aboriginal Group, BW Gold will provide the job description to the Aboriginal Group to assist in retaining a suitable candidate. It is the responsibility of the Aboriginal Group to ensure that the monitor is available and capable of participating in monitoring activities in accordance with the job description. Aboriginal Groups will be required to enter into a contract with BW Gold to provide a Monitor, and the contract may include requirements for pre-employment screening testing, vaccination, insurance among other elements.

The Aboriginal Group will be responsible for notifying BW Gold if there are any changes to the appointed Aboriginal Monitor.

6.4 Funding for Aboriginal Monitors

BW Gold is responsible for funding Aboriginal Monitors, by either employing the Aboriginal Monitor directly or by providing funding to the Aboriginal Group to retain a Monitor.

In discussion with each Aboriginal Group, BW Gold will determine the approach to payment which may involve either payment directly to the Monitor (e.g., in the case of a Monitor being retained by BW Gold

[Section 6.3.1]), or reimbursing the Aboriginal Group upon the provision of invoices (e.g., in the case of an Aboriginal Group retaining their Monitor directly [Section 6.3.2]).

The compensation of Monitors will be equitable regardless if retained by BW Gold (Section 6.3.1) or an Aboriginal Group (Section 6.3.2). Notwithstanding, an Aboriginal Monitor retained by BW Gold may also be offered standard benefits provided to all employees (e.g., health insurance benefits). Where BW Gold retains the Monitor, the Monitor will be compensated directly in accordance with an employment agreement. Where an Aboriginal Group retains the Monitor, BW Gold will enter into a contractual agreement with the Aboriginal Group for retention of the Monitor.

In the case that BW Gold retains the Monitor, funding will be provided on a bi-weekly basis or as per the employment agreement, and in the case that the Aboriginal group retains the Monitor, funding will be provided on a monthly basis upon BW receipt and approval of an invoice from the Aboriginal Group in accordance with the approved contract. Where the Aboriginal Group retains the Monitor, it will be the Aboriginal Group's responsibility to pay the Monitor.

The amount of funding will be set out in either the employment agreement or the contractual agreement as appropriate and will be reflective of market conditions at the time of hire. The amount of funding (i.e., hourly rate) will be reviewed and updated as needed to reflect market conditions on an annual basis.

BW Gold is not required to fund the Monitor role during periods where there is no one willing or able to carry out the duties of a Monitor on behalf of that particular Aboriginal Group.

6.5 Communications with Aboriginal Monitors

BW Gold will confirm with Aboriginal Group(s) every four months to confirm the Monitor has been available and capable of carrying out the activities pursuant to the ToE. This confirmation is complementary to the Monthly Monitoring Plans (discussed in the ToE) in which the Aboriginal Monitor will identify their monthly monitoring schedule, anticipated training needs and equipment.

This communication will focus on reporting to the Aboriginal Group that the Aboriginal Monitor:

- is aware of and has scheduled monitoring activities;
- has appropriate skills and capabilities to participate in monitoring and Project activities; and
- has appropriate equipment to participate in monitoring and Project activities.

As needed, BW Gold will work with the Aboriginal Group and Aboriginal Monitor to address scheduling, skills and equipment needs identified during this regular communication.

7. REPORTING STRUCTURE AND INCORPORATION OF INPUT FROM ABORIGINAL MONITORS

The Project's roles and responsibilities and reporting is described in Table 3-1. Aboriginal Monitors will report to the EM, and will also have lines of communication to the Indigenous Relations Manager and their Aboriginal Group.

Observations and monitoring results and other input from Aboriginal Monitors will be communicated directly to the EM. The EM will review and relay the information, as needed, to different departments or parts of the operation, as appropriate. As needed, meetings will be convened to discuss input from Aboriginal Monitors where there is discordant views or to refine the implementation. Meeting participants would include the BW Gold EM and Indigenous Relations Manager and the Aboriginal Monitor providing the observations for discussion with support, as needed, by up to two (2) Aboriginal Group representatives.

The results of the monitoring and observations provided to the EM will be summarized by the Aboriginal Monitors, for BW Gold and the Aboriginal groups in monthly monitor reports (Appendix C).

8. COORDINATION OF ABORIGINAL MONITORS WITH THE EAO COMPLIANCE AND ENFORCEMENT

In accordance with the 2018 *Environmental Assessment Act*, EAO conducts inspections, complaint reviews, investigations and enforcement to support timely and effective oversight of projects (EAO 2020). At the beginning of each fiscal year, EAO prepares an annual inspection plan, and as needed, additional inspections may be conducted following a complaint, information received from an Aboriginal Group, other government agencies, the public, or as follow-up to previous inspections. Field inspections can be planned or spontaneous:

- Planned inspections are typically arranged with advance notice, including the timing and anticipated documents that will be requested during the inspection.
- Spontaneous inspections are announced when the C&E officer arrives on site.

BW Gold will provide opportunity for Aboriginal Monitors to participate in EAO field-based C&E activities² and the participation of Aboriginal Monitors will be aligned with the EAO's Policy and Procedures (EAO 2020). It is assumed the EAO will share its annual inspection plan with Aboriginal Groups, Aboriginal Monitors and BW Gold as the company is responsible for coordinating field inspections among all parties. This would include transportation arrangements to the mine site, providing accommodations, providing input into EAO's inspection schedule and transportation to inspection areas.

The participation of Aboriginal Monitors in C&E field activities is described in Table 8-1.

Table 8-1: Aboriginal Monitor Participation in EAO C&E Inspections

Organization	Action	Timing
EAO C&E	Provide annual schedule of compliance inspections to BW Gold and Aboriginal Groups and/or Aboriginal Monitors	By end of January of each year
	Provide detailed inspection schedule to BW Gold and Aboriginal Groups and/or Aboriginal Monitors, including dates, areas to be inspected	A minimum of 21 days prior to inspection date
	Provide BW Gold and Aboriginal Groups and/or Aboriginal Monitors a list of documents to be made available for review at the beginning of the inspection	A minimum of 21 days in advance of the inspection date
BW Gold	Based on EAO's inspection schedule, organize transportation on BW Gold's shuttle, accommodations, and transportation to inspections areas (if needed)	Within 24 hours of written notification by the EAO C&E Team
	Check with Aboriginal Monitor(s) who are (or will be) on site during an EAO C&E Team inspection regarding their participation in the inspection activities	A minimum of 14 days prior to a scheduled inspection

² It is not expected that Aboriginal Monitors will be involved in desktop C&E activities although BW Gold also supports monitors participating in desktop activities if requested by EAO.

Organization	Action	Timing
BW Gold (<i>cont'd</i>)	Relay information to EAO C&E Team to confirm Aboriginal Monitor participation (or regrets)	Within 24 hours of confirmation (or regrets) of notification by Aboriginal Monitors. When Aboriginal Monitors have requested involvement, BW Gold will provide the EAO C&E Team with a written (e.g., emailed) request for participation and include the contact information of participating Aboriginal Monitors.
	Conduct Site Orientation for C&E Team participants	Upon arrival at site
Aboriginal Monitors	Confirm or reject invitation to participate in EAO-led C&E field visit	Written response within 24 hours to BW Gold (and directly to EAO C&E Team)
	Work with BW Gold to coordinate logistics for participation in the field visit	In a timely manner, based on the timing (and level of advanced notice) of the field visit
	Provide BW Gold with a list of any additional documents requested for review	Written request within 48 hours (where possible) of C&E field visit

For unplanned field visits, it is the responsibility of the EAO's C&E Team to coordinate the participation of Aboriginal Monitors, using the contact information that is shared with them (section 8.2). Note that BW Gold may need to be involved in any logistics of transportation (and accommodation, if required) for Aboriginal Monitors that are involved in the field visit.

Aboriginal Monitors will be invited to attend the EAO's C&E Team inspection reporting sessions with mine personnel.

8.1 Contact Information Sharing and Timelines

Table 8-2 describes how BW Gold will facilitate sharing contact information between Monitors and the EAO's C&E Team.

Table 8-2: Contact Information Sharing

Provision of Aboriginal Monitor contact information to the EAO C&E Team	BW Gold will provide EAO C&E Team in writing with the contact information of the Aboriginal Monitor within 14 days of their retention by BW Gold, based on the start date. If there is a change in Aboriginal Group Monitor, BW Gold will provide contact information of the new Aboriginal Group Monitor within 14 days of the start date of the new Monitor.
Provision of EAO C&E Team contact information to the Aboriginal Monitor	Within 14 days of the Monitor's start date, BW Gold will provide the contact information for EAO's C&E team in writing to the Monitor. If there is a change in EAO's C&E contact, BW Gold will notify and update the contact information, in writing to the Aboriginal Group Monitor within 14 days of being notified by EAO of the new contact information.
Provision of EAO C&E Team contact information BW Gold	It will be the responsibility of the EAO's C&E Team to notify BW Gold if there is a change in their contact information, in order that BW Gold is able to circulate the updated information to Aboriginal Monitors.

9. PLAN IMPLEMENTATION SCHEDULE

The AGMMP will be implemented throughout the following phases:

- Construction: Year -2 to Year -1;
- Operations: Year +1 to Year +23; and
- Closure: Year +24 to Year +45.

This plan will also be implemented during any care and maintenance periods.

Following engagement with Aboriginal Groups on the AGMMP, the implementation of the plan will start with the retention of Aboriginal Monitors (Section 6) and the implementation of the ToE (Appendix D).

Within the ToE, the Annual Conceptual Monitoring Plan and Monthly Monitoring Plan are described (Appendices D-1 and D-2 respectively). These plans are to be prepared by Aboriginal Monitors and will provide details on the scheduling of monitoring priorities covered by the plans.

10. REPORTING AND RECORD KEEPING

This section describes reporting and record keeping associated with the AGMMP.

10.1 Environmental Assessment Certificate Reporting

Condition 5 of the EAC sets out reporting requirements and requires the Holder [BW Gold] to submit a report to the attention of the EAO and Aboriginal Groups on the status of compliance with the EAC at the following times:

- a. At least 30 days prior to the start of Construction;
- b. On or before March 31 in each year after the start of Construction;
- c. At least 30 days prior to the start of Operations;
- d. On or before March 31 in each year after the start of Operations;
- e. At least 30 days prior to the start of Closure;
- f. On or before March 31 in each year after the start of Closure until the end of Closure;
- g. At least 30 days prior to the start of Post-Closure; and
- h. On or before March 31 in each year after the start of Post-Closure until the end of Post-Closure.

BW Gold will submit reports to EAO and Aboriginal Groups within the timelines specified in Condition 5.

10.2 Aboriginal Monitor Reports

Aboriginal Monitors are required to submit monitoring reports to BW Gold and the Aboriginal Group on a monthly basis unless notified by Aboriginal Monitors and agreed by BW Gold.

In discussion with their Aboriginal Group and in consideration of the Project monitoring activities, the reporting schedule may be modified; for example, more frequent reporting may be required during construction of the transmission line required. Additionally, in response to an unanticipated event (e.g., a spill of a hazardous material), more frequent reporting may be required.

The draft monthly reports will be provided to the EM for a 7-day factual review before providing a final report to both the EM and the Aboriginal Group. Final monthly reports will be submitted to BW Gold and their Aboriginal Group by the 14th day of the subsequent month (i.e., the monthly report for January will be submitted by February 14th). Reports will be provided in written digital format (unless otherwise agreed).

BW Gold's EM is responsible for data management, reporting and records for the Project. BW Gold's factual review will focus on aspects of the Aboriginal Monitor Report that incorporate data from the Project. This may include, for example number of water quality samples sent to a lab, time of an incident, or participation in an EAO compliance & enforcement inspections, etc. Review and edits will not focus on the observations or proposed mitigation measures. No changes to text. The Aboriginal Group Monitor is ultimately responsible for providing the report to the Aboriginal Group, and it will be up to the Aboriginal Group Monitor as to whether they accept or otherwise address the review comments of the EM.

BW Gold recognizes that reporting is one of the many responsibilities of Aboriginal Monitors and intends for the reporting content and process to be predictable and efficient. Appendix C presents a monthly report content and a proposed template.

The monthly monitoring reports will be made available to the IEM. In the case that information regarding Aboriginal values needs to be protected, BW Gold will work with the Aboriginal Group to provide such protection.

10.3 Record Keeping

Aboriginal Monitors will upload monitoring reports into an electronic database. Reports will be entered into a standard format that allows for data reporting and analyses, where appropriate. Monitoring reports will be stored, at a minimum, for 25 years following the end of decommissioning of the Project and will be made available to Aboriginal Groups for review upon request.

11. PLAN EVALUATION

This AGMMP will be reviewed annually to assess the plan's effectiveness and to ensure that it reflects roles and responsibilities of Aboriginal Monitors. Aboriginal Groups and Monitors will be involved in the annual review as follows:

- **Aboriginal Monitors:** BW Gold will meet with Aboriginal Monitors to seek feedback from Aboriginal Monitors, including ToE, roles and responsibilities, training, safety, equipment and reporting. Representatives of Aboriginal Groups that retain their Aboriginal Monitors will be invited to participate in these meetings.
- **Aboriginal Groups:** BW Gold will engage designated representatives of the Aboriginal Groups in an annual evaluation of the AGMMP. A minimum of one month before the annual review, BW Gold will notify representatives of the Aboriginal Group of the AGMMP review in order that they can solicit input from their Aboriginal Group and Monitor on the effectiveness of the AGMMP. The AGMMP will then be a topic of discussion on a meeting agenda.
- Notes and action items of the evaluation meetings will be documented and retained on file in accordance with Section 10.3.

The evaluation processes involving the Aboriginal Monitors and Aboriginal Group representatives will be coordinated in order that input can be collated, evaluated and implemented in an annual revision to the plan as required.

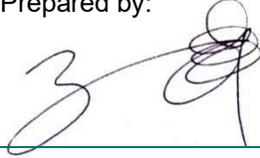
12. PLAN REVISION

The AGMMP is a living document that will evolve over time in response to feedback from Aboriginal Groups and EAO. Prior to adopting and implementing any changes to the AGMMP, proposed revisions will be provided to Aboriginal Groups for a 30 day review and comment period. Final versions of the plan will be provided to Aboriginal Groups and EAO as required by the condition.

13. QUALIFIED PERSONS

This management plan has been prepared by the following qualified person:

Prepared by:

A handwritten signature in black ink, appearing to be 'Zoe Mullard', written over a horizontal green line.

Zoe Mullard
Principal Consultant

14. REFERENCES

Definitions of the acronyms and abbreviations used in this reference list can be found in the Acronyms and Abbreviations section.

Legislation

Declaration on the Rights of Indigenous Peoples Act, SBC 2019, c 44.

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