

You are welcome to write as much or as little as you like for the following questions, and of course none are mandatory. If you would like to discuss the intent of any question, please contact rose@satarla.com – they are intended just to provide context and a high-level overview. Your answers will be uploaded to the website and openly available as pre-reading material, with discussion at the event taking place on the assumption that these have been read.

1. Please state the title of your Code / Standard + date of release for current version. (note – if possible, please link or attach a copy of your Code / Standard)

Canadian Securities Administrators work to harmonize securities laws for all provinces and territories under National Instruments. National Instruments that cover ESG disclosure include the following:

- NI 58-101 Disclosure of Corporate Governance Practices (2017)
- NI 51-102 Continuous Disclosure Obligations (2018)
- Form 51-102F1 Management’s Discussion and Analysis (2015)
- Form 51-102F2 Annual Information Form (2015)
- NI 43-101 Standards of Disclosure for Mineral Projects (2016)
- Form 43-101F1 Technical Report (2011)

The applicable instruments, rules, policies, and forms can be found via each provincial or territorial securities regulator website (e.g., British Columbia Securities Commission, <https://www.bsc.bc.ca/securities-law/law-and-policy/instruments-and-policies/4-distribution-requirements>, and Ontario Securities Commission, https://www.osc.gov.on.ca/en/SecuritiesLaw_irps_index.htm).

There are no plans yet announced to update the ESG requirements in NI 43-101 (the mining rule) or in Form 43-101F1 Technical Report.

Canadian Institute of Mining, Metallurgy, and Petroleum (CIM), Mineral Resources Mineral Reserves Committee (MRMR) prepares and publishes standards and best practices for the mineral industry that support securities regulations (<https://mrmr.cim.org/en/>).

2. Have you been actively working to improve guidance on reporting of Environment, Social, Governance (ESG) / Sustainability aspects within your Code / Standard? If so, please provide a brief summary of the work that has been / is being / is planned to be carried out.

Volunteer industry professionals, members of CIM’s Environmental and Social Responsibility Society (ESRS) have been working under the guidance of CIM’s MRMR Committee since 2017 to prepare environmental and social best practice guidelines. Although much has been written, the guidance is still under revision with the focus of the document being revised to be less about disclosure and more about basic principles of good environmental and social practice for mineral projects with references/links to the extensive guidance already published.

CIM's MRMR Committee has generally excluded the issue of governance practices from their current best practice guidelines. They may initiate preparation of a separate best practice guideline on governance in the future. The latest revision of the environmental and social best practice guidelines only touches on the essentials regarding good corporate governance with respect to environmental and social issues.

3. What impact are you having / do you hope to have through the update to your Code / Standard (note – if no updates are in place, please feel free to outline where you feel ESG could have an impact within resources and reserves)?

The ESG best practice guidelines are intended to provide guidance to Canadian mining companies in evaluating the environmental, social, and permitting aspects of mineral exploration, development, and mining properties. These aspects have been recognized and essential components of mineral property evaluation, and mineral project development. Investors in the mining industry have recognized the importance of ESG when assessing a public company's ability to successfully navigate the process for obtaining permits to explore, develop, and produce a mine. ESG factors are part of the assessment for reasonable prospects for eventual economic development of Mineral Resources and are among the modifying factors relevant to the conversion of Mineral Resources to Mineral Reserves in accordance with Canadian Institute of Mining, Metallurgy, and Petroleum's (CIM's) Estimation of Mineral Resources and Mineral Reserves Best Practice Guidelines; CIM, 2019.

It is hoped that the guidelines will improve transparency, materiality, consistency and completeness of reporting.

4. Have you / your National Reporting Organisation / any member professional organisation developed any materials (formal or otherwise) that may be useful to other codes / standards / interested parties? If so, please provide links to them here or provide details on how they can be shared. (please note – if these materials cannot be shared, please feel free to still share knowledge of their existence and a contact person if appropriate).

CIM Mineral Exploration Best Practice Guidelines (November 23, 2018):

<https://mrmr.cim.org/media/1135/cimval-code-november2019.pdf>

CIM Estimation of Mineral Resources and Mineral Reserves Best Practice Guidelines (November 29, 2019):

<https://mrmr.cim.org/en/best-practices/estimation-of-mineral-resources-mineral-reserves/>

CIM has been working towards the preparation of Environmental and Social Best Practice Guidelines for Mineral Projects and expect a draft version will be available for public comment in 2021.

5. Are you seeking any support / materials / ideas / content from other codes / standards? If so, please outline.

We are interested in harmonizing the CIM ESG practice guidelines with other national standard setters for preparation and reporting of mineral property information.

6. Any final comments / suggestions re. ESG specifically within resource and reserves codes that you would like to share?

In February 2019 the United States Securities and Exchange Commission adopted new standards for mineral property disclosure by way of Subpart 1300 of Regulation S-K. Many of the requirements in this new mining disclosure rule are taken word for word from NI 43-101, including factors pertaining to environmental compliance, permitting, and local individuals or groups in a Technical Report Summary of the mineral project. This was a big step forward to more closely align the SEC's mining property disclosure regime with the CRIRSCO standards.