

NATIONAL TECHNICAL SPECIFICATION

ULC TS-2723:2024

ECOLOGO® CERTIFICATION PROGRAM FOR RESPONSIBLE DEVELOPMENT FOR THE MINERAL EXPLORATION INDUSTRY

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FOREWORD

Certification, inspection and testing organizations are periodically requested to promptly develop technical requirements, specifications, reports or guidelines for devices, constructions, materials, systems and services where a National Standard of Canada, international standard (ISO/IEC) or Other Recognized Document (ORD) does not currently exist or is not entirely applicable.

Underwriters Laboratories of Canada (ULC Inc.) administers the development and publication of Technical Guides (TG), Technical Reports (TR) and Technical Specifications (TS), collectively known as ULC Technical Documents, in accordance with the National Technical Specifications Process of the Standards Council of Canada (SCC, 2019). ULC Technical Documents cover an array of document types that are developed to address rapidly changing environments in technology, business or regulation, where speed of delivery rather than full consensus is of paramount importance. They cover areas that are not typically regulated, are intended to be published for immediate use, may be developed in parallel with standards or ORDs activity to obtain feedback, and are intended to eventually be transformed and republished as standards.

This National Technical Specification, ULC TS-2723:2024, is a normative document that was the subject of a detailed declaration of innovation filed on Feb. 5, 2016, by Suzanne Durand, Joanie Caron and Hugo Asselin of the Université du Québec en Abitibi-Témiscamingue (UQAT). The certification was designed by the UQAT-UQAM Chair in Mining Entrepreneurship as part of a partnership with the Québec Mineral Exploration Association (QMEA), with financial support from the Ministère de l'Économie, de l'Innovation et de l'Exportation (MEIE) and technical support from Groupe MISA.

UQAT's normative document was integrated into the ECOLOGO® Certification program and established by ULC in the province of Québec in 2019. A technical committee then brought together various mineral exploration stakeholders. Their objective was to modify the normative document with a perspective to nationalizing the program.

PREFACE

This is the first edition of the National Technical Specification on ECOLOGO® Certification program for Responsible Development for the Mineral Exploration Industry, ULC TS-2723:2024.

Only metric SI units of measurement are used in this ULC National Technical Specification. If a value for measurement is followed by a value in other units in parentheses, the second value may be approximate. The first stated value is the requirement.

In Canada, there are two official languages: French and English. All safety warnings must be in French and English. Attention is drawn to the possibility that some Canadian authorities may require additional markings and/or instructions to be in both official languages.

In this ULC National Technical Specification, "shall" is used to express a requirement, i.e., a provision that the user is obliged to satisfy in order to comply with the document; "should" is used to express a recommendation or that which is advised but not required; "may" is used to express an option or that which is permissible within the limits of the standard; and "can" is used to express possibility or capability.

This ULC National Technical Specification is intended to be used for conformity assessment.

1. SCOPE

1.1 This program outlines responsible development requirements for the mineral exploration industry. Certification of companies is contingent on verification of compliance with requirements of the program by an independent auditor. ECOLOGO® is the Certification Program. UL Solutions is the administrator of the ECOLOGO® certification program.

2. PURPOSE

- 2.1 This program applies to companies that conduct mineral exploration activities in Canada and wish to be recognized for their application of responsible development practices. Not all requirements in this program will apply to all activities, projects or applying companies; non-applicable requirements shall be justified. This program does not apply to post-mineral exploration activities related to production.
- 2.2 The mineral development process involves two main phases, mineral exploration and mineral deposit appraisal, each with varying impact on the environment and surrounding communities.
- 2.3 **Mineral exploration**: The mineral exploration phase includes grassroots mineral exploration activities such as the acquisition of mineral rights, prospecting, sampling and ground surveys to detect anomalies, and trenching, initial drilling and regional surveys to investigate these anomalies. It also includes more advanced exploration activities to delimitate a mineral deposit and interpret some of its characteristics (grade, quality, tonnage) through further sampling, drilling and the application of other techniques such as downhole geophysics and initial mineral processing tests. It is in this late stage of the Mineral Exploration phase that the amount of inferred resources and some indicated resources can be determined.
- 2.4 **Mineral deposit appraisal**: The mineral deposit appraisal phase requires larger financial commitments and is a key step in determining if a project can become a viable mining operation. In this phase, the mineral deposit is further defined (to an indicated and/or measured resource) through detailed mapping, sampling and drilling. The viability of the project is determined through engineering, economic and environmental studies that support prefeasibility and feasibility studies to, in turn, support a production decision.

3. GLOSSARY

- 3.1 **Accommodation:** Amicable arrangement/compromise, excluding accommodations from treaties or negotiations between the government and the communities
- 3.2 **Affected stakeholder:** Individual or group affected by a company's decisions or operations, excluding Indigenous communities, which have been defined separately (Indigenous community)
- 3.3 **Camp:** All supporting infrastructure and outbuildings where workers live during mineral exploration work

- 3.4 **Claim:** A claim to the minerals within a specified area that has been located or acquired by a method set out in the acts and regulations of the province or territory in which it is made and grants the holder exclusive rights to explore mineral wealth for a specific duration of time
- 3.5 **Company:** Any individual or entity that performs or that mandates other companies to complete mineral exploration work as defined in Clause 2.1
- 3.6 **Cultural heritage:** Collective of cultural resources inherited from past generations that include but are not limited to the resources and sites that are protected through provincial and federal legislation; cultural heritage also includes, as defined by the Indigenous community, ideas, experiences, worldviews, objects, forms of expression, practices, knowledge, spirituality, food, stories, resources, kinship ties and places valued by Indigenous Peoples
- 3.7 **Indigenous community:** First Nations, Inuit or Métis communities with existing or claimed ancestral and treaty rights within the meaning of Section 35 (1) of the Constitution Act, 1982, whose recognized or claimed territory can be directly or indirectly affected by mineral exploration activities
- 3.8 **Local:** The region within which mineral exploration and appraisal are conducted, as well as any surrounding areas that may be impacted by future mine complex development
- 3.9 **Local authority:** Authority within a region as recognized by federal, provincial and territorial governments
- 3.10 **Mining lease:** Mining title, which grants the holder exclusive rights to exploit mineral resources as set out in the acts and regulations of the province or territory in which the title is granted
- 3.11 **Mining right:** Immovable property rights, such as claims, leases and dispositions, as set out in the acts and regulations of the province or territory in which the rights are granted
- 3.12 **Outstanding geological site:** Land on which geological, geomorphic, landscape or biological characteristics are of educational value or of interest for scientific research or conservation purposes, and that deserves to be protected, in particular because it is threatened, rare or vulnerable
- 3.13 **Potentially affected stakeholder:** Individual or group potentially affected or affected by a company's decisions or operations, excluding Indigenous communities, which have been defined separately (Indigenous community)
- 3.14 **Riparian ecotone:** Transitional zone between the water environment and the forest, characterized by the muscinal, herbaceous or shrubby vegetation of wetlands and sometimes including a few scattered trees
- 3.15 **Stakeholder:** See "potentially affected stakeholder" and/or "affected stakeholder"
- 3.16 **Urbanized area:** Area as defined by provincial legislation according to the limits reproduced on mining title maps
- 3.17 Water environment: Regular or intermittent flow streams, rivers and lakes

4. LEGAL REQUIREMENTS

4.1 All laws, regulations, guidelines and policies in effect shall be respected by the Company. Certain legal elements are subject to specific requirements in this program, particularly due to the potential for serious consequences for non-adherence. The Company's legal compliance is not limited to these requirements. It is the Company's responsibility to identify and comply with all other legal requirements related to its operations. If a regulation is more stringent than a requirement of this program, the former prevails.

5. RESPONSIBLE DEVELOPMENT ALONG THE VALUE CHAIN

5.1 CONTEXT

- 5.1.1 For the purpose of this program, the value chain represents every activity set out in clauses 2.3 and 2.4. It is common practice for exploration companies that hold claims to mandate service providers to carry out various works included in these activities.
- 5.1.2 Where the applying Company is a claim-holding company that mandates a service provider, such Company is responsible for ensuring that the delegated works comply with the requirements of this program.
- 5.1.3 Where the applying Company is a service provider, the execution of its work must comply with the requirements of this program. However, to the extent that it does not hold the concerned claims, the applying Company is not responsible for obtaining permits, authorization certificates and establishing agreements with potentially affected stakeholders or Indigenous communities unless it has been specifically mandated to do so. Otherwise, it must obtain the information pertaining to the conditions for performing its work set out in the permits, authorization certificates and agreements for compliance and, consequently, comply with the requirements of this program.

5.2 VERIFICATION OF COMPLIANCE WITH REQUIREMENTS RELATED TO THE PERFORMANCE OF WORK DELEGATED TO SERVICE PROVIDERS BY THE APPLYING COMPANY

5.2.1 Where the applying Company has delegated work covered by this program to a service provider, the requirements in relation to such work shall be respected by the latter. The applying Company shall provide all relevant information and ensure compliance with these requirements on the part of the contracted service providers but retains the overall responsibility.

5.3 COMPLIANCE WITH SPECIFIC CONDITIONS FOR PERFORMING WORKS BY APPLYING SERVICE PROVIDERS

5.3.1 Conditions for performing works set out in the permits, authorization certificates and agreements entered into between the Company holding the claims and potentially affected stakeholders and Indigenous communities shall be complied with. The applying service provider shall obtain all information pertaining to these conditions and comply with them.

6. ENVIRONMENTAL QUALITY

6.1 EFFICIENT USE OF NATURAL RESOURCES

- 6.1.1 <u>Consumption of resources</u>: The Company shall measure and show evidence of the application of continuous improvement practices surrounding the consumption of water, energy sources and the creation and release of greenhouse gases.
- 6.1.2 <u>Residual materials</u>: The Company shall show evidence of a material management tracking system according to the four Rs hierarchy (reduction at source, reuse, recycling and recovery).

6.2 SOIL QUALITY

- 6.2.1 <u>Access permit</u>: When the Company's operations include cutting trees, construction or improvement of infrastructure (roads, bridges, culverts, bypasses, etc.) on land, it shall obtain a permit and comply with the applicable provincial and territorial regulations.
- 6.2.2 <u>Access land use</u>: Company operations shall not unduly affect the natural contour of the land, and drainage and shall not lead to sedimentation, channeling or water accumulation.
- 6.2.3 <u>Traffic</u>: Exploration activities shall be conducted in a manner that minimizes soil loss so that the site can be reasonably reclaimed to support appropriate self-sustaining vegetation. Machinery traffic shall be optimized in the project zone; constructing, deactivating and reclaiming infrastructure and maintaining equipment shall not be within the required riparian ecotone setback of water environments or wetlands in order to avoid soil compaction and rutting. If required, a ministerial authorization shall be obtained when exploration activities will occur within regulated riparian setback distances.
- 6.2.4 <u>Machinery maintenance</u>: In order to avoid all types of leaks, machinery shall be equipped with a maintenance log, routinely inspected and maintained in good condition. All mechanised equipment shall be equipped with the necessary materials for responding to spills.
- 6.2.5 <u>Hazardous materials management</u>: All operations involving hazardous materials shall be conducted in accordance with applicable regional regulations. An emergency plan shall be established for all hazardous materials.
- 6.2.6 <u>Lubricants</u>, oils and soaps: Hydraulic oils and lubricants that are biodegradable (60% in 28 days) and compliant with international environmental certifications and soaps that are non-toxic shall be used when operating drilling machinery.
- 6.2.7 Calcium chloride (CaCl₂): Alternatives to calcium chloride use shall be investigated. The concentration of calcium chloride shall be closely monitored by a refract meter to ensure that the minimum required concentration is maintained. The use of calcium chloride shall be managed to protect workers and the environment. A recirculation system shall be deployed to reduce calcium chloride use. Bags of calcium chloride shall be stored in a manner that limits the potential for spill, water exposure or wind dispersal.
- 6.2.8 <u>Explosives</u>: The possession, storage and transport of explosives shall be conducted in accordance with applicable regulations and as legally mandated.

- 6.2.9 <u>Restoration</u>: All exploration sites shall be restored to their natural state. The mineral exploration Company shall have a current restoration plan that outlines the activities that will be undertaken to restore the site as per the agreed-upon or required end use of the land and as required by the regulator. Restoration of mineral exploration sites normally includes the following:
 - A Removing equipment, buildings, materials and infrastructure used in exploration
 - B Preparing the ground, recontouring and stabilization of slopes and drainage systems
 - C Replacing topsoil, organic matter and woody debris that were salvaged and stockpiled before and during mineral exploration
 - D Revegetating and seeding (if needed)
 - E Monitoring to ensure that restoration objectives have been met
- 6.2.10 <u>Rehabilitation plan financial guarantee</u>: The mineral exploration Company shall ensure that at all times there are sufficient funds to carry out the work outlined in the current rehabilitation plan and, if required, that a bond or financial guarantee has been deposited with the appropriate regulator.

6.3 WATER QUALITY

- 6.3.1 Water environments or wetlands: Prior to the Company's operations occurring in near-water environments or wetlands, it shall validate the type of water environment or wetland on the site. Conditions specific to the environment shall be respected.
- 6.3.2 <u>Camp</u>: All campsites shall comply with applicable regulations. The Company shall demonstrate efficient and responsible wastewater handling practices on the sites.
- 6.3.3 <u>Groundwater withdrawal</u>: No mineral drilling operations shall occur within 30 meters of a water extraction site independent of a water system, nor within 100 meters from a water extraction site that supplies a water system.
- 6.3.4 <u>Water withdrawal</u>: The amount of water withdrawn from a body of water for mineral drilling purposes shall not compromise the natural environment's integrity. A screen shall be installed at the end of the hose from the pump.
- 6.3.5 <u>Suspended solids</u>: Prior to the beginning of operations, facilities and materials that minimize the emission of suspended solids in wetlands or water environments shall be installed in the drilling machine's immediate surroundings.
- 6.3.6 <u>Wastewater</u>: Wastewater generated by mineral exploration work that reaches wetlands or water environments shall be free of oil and suspended solids visible to the naked eye.
- 6.3.7 <u>Pumping stations</u>: Pumping stations shall be located at least 10 meters away from the riparian ecotone, and 15 meters when the slope is greater than 30%.

- 6.3.8 <u>Disposal of drill cuttings urban areas and agricultural land</u>: When operations occur in urban areas or on agricultural land, drill cuttings shall be disposed of at an authorized site.
- 6.3.9 <u>Disposal of drill cuttings</u> <u>other territories</u>: Drill cuttings shall be eliminated in a small, natural depression or in a safe and fitted trench according to the site permit or at least 30 meters away from wetlands and water environments in order to contain suspended solids and avoid any leaching of particles to these areas.
- 6.3.10 <u>Machinery provisioning and storage</u>: Provisioning and storage of all mobile machinery shall occur at least 30 meters away from water environments and outside of wetlands.
- 6.3.11 <u>Wetland drilling winter</u>: Other than drilling by helicopter, drilling in wetlands shall be conducted in winter, when the ground is frozen over 35 centimetres deep, except in cases that are justified.
- 6.3.12 <u>Wetland drilling seasons other than winter machinery</u>: When it is impossible to conduct wetland drilling during winter, machinery and a drilling platform with a greater load-bearing capacity than the surrounding ground shall be used.
- 6.3.13 Wetland drilling seasons other than winter access road: When it is impossible to conduct wetland drilling during winter and an access road is to be built, engineered mats should be used instead of gravel. If gravel has to be used, a geotextile shall be placed underneath it so that all materials can be recovered at the end of operations.

6.4 SENSITIVE AREAS AND WILDLIFE HABITAT

- 6.4.1 <u>Territorial restrictions</u>: The Company shall respect restrictions that affect the territory and apply all practices recommended by the relevant ministries.
- 6.4.2 <u>Located species at risk</u>: The Company whose operations may alter the habitat of a species at risk (on public and private land) shall adhere to species-at-risk legislation.
- 6.4.3 <u>Species at risk potentially present on site</u>: Workers shall be familiar with species at risk potentially present on site (public and private land) in order to recognize them even if they have not been previously identified or located. In such cases, the Company shall notify the relevant ministry and apply any recommended mitigation or avoidance procedures.
- 6.4.4 <u>Dam, nest and den</u>: A verification of the existence of any beaver dam, animal nest or den shall be conducted prior to activities. No such habitat shall be destroyed except where such habitat is likely to cause serious harm to an existing infrastructure or when a permit from the provincial or territorial ministry having jurisdiction has been issued prior to destruction.
- 6.4.5 <u>Fish</u>: When the Company's operations may cause serious harm to fish as defined by the Fisheries Act that are part of commercial, recreational or Indigenous fisheries, or fish that support such fishery, an authorization from the relevant ministry shall be obtained. Where a specific Department of Fisheries and Oceans (DFO) code of practice applies, it shall be adhered to.

¹ Mobile machinery includes tractors, bulldozers and all-terrain vehicles. Drills are not considered mobile machinery.

- 6.4.6 <u>Fire protection</u>: A fire safety plan shall be in place at all times. When a Company's operations take place during the fire season as defined in the region of operation, the relevant authority having jurisdiction shall be notified and a fire safety plan shall be obtained if required by that authority.
- 6.4.7 <u>Tree cutting</u>: Tree cutting in quantity and quality shall be kept to a minimum as required by the activities undertaken. Cutting of rare species and old-growth trees shall be avoided when possible.
- 6.4.8 <u>Invasive alien species</u>: Materials and equipment that come in contact with the natural habitat shall be free from fragments or seeds of invasive alien species.

7. INDIGENOUS COMMUNITY RELATIONS

NOTE: The requirements arising from this section may be non-applicable due to the nature of the applicant Company (service provider); refer to Section 5 for applicability.

7.1 RECOGNITION OF THE CONCERNS AND ACCOMMODATION OF INDIGENOUS COMMUNITIES

- 7.1.1 <u>Identification of Indigenous communities</u>: In the week following claim acquisition, the Company shall identify concerned Indigenous communities and validate their identification with relevant authorities.
- 7.1.2 <u>Claim acquisition notice</u>: Within 60 days of the claim(s) being staked or otherwise acquired, Indigenous communities shall be informed of the claim acquisition and given the Company representative's contact information.
- 7.1.3 <u>Communication</u>: A minimum of 30 days before the commencement of work, the Company shall work with Indigenous communities to establish a communication and information sharing process (see Clause 7.1.4) for the mineral exploration activities. Notwithstanding Indigenous communities' rights to suggest or decline a process, the process should be collaboratively developed in a manner that:
 - A Recognizes the varying level of experience with and knowledge of mineral exploration in Indigenous communities through identifying and addressing local capacity constraints to engage in the process
 - B Incorporates traditional ecological knowledge as directed by the community
 - C Seeks to identify and align with the community's requirements for free, prior and informed consent regarding the activity, including the identification of key priority areas (nature and impacts of projected work, location, schedule, restoration, mitigation measures, engagement)
 - D Provides a clear process for identification, consideration and documentation of concerns and communication related to the activity (including designated key points of contact for each party)

- E Identifies the procedures to follow and period of application of the process
- F Identifies a dispute resolution process (as requested)
- 7.1.4 <u>Information sharing</u>: Information provided to Indigenous communities shall meet the following requirements:
 - A Be understandable: Communicated in a language suited to the Indigenous community and outlined clearly
 - B Be relevant: Present a clear and direct link with the subject and be of importance to the Indigenous community
 - C Be objective: Based on experience, realistic and free of personal interests
 - D Be timely: Communicated at the relevant time
 - E Be reliable: Based on credible sources and facts that can be validated
 - F Be truthful: Based on reality and not misleading
 - G Be complete: Not partial; presenting both positive and negative aspects
 - H Be precise: Focused and accurate
 - I Be accessible: Available to consult in a way that serves the stakeholders best
- 7.1.5 <u>Implementation of mitigation measures</u>: Mitigation measures for negative impacts on Indigenous interests, as previously communicated by Indigenous communities in Clause 7.1.3 (C), shall apply.
- 7.1.6 Remedial measure: If the mitigation measures provided for in Clause 7.1.5 prove insufficient, the Company shall agree with Indigenous communities on a remedial measure proportional to the sustained impacts. If an agreement is impossible per the dispute settlement procedure, the Company shall indicate why the demands of Indigenous communities have been rejected.
- 7.1.7 <u>Fulfilling commitments</u>: Commitments between the Company and Indigenous communities shall be respected.

8. QUALITY OF LIFE

NOTE: The requirements arising from this section may be non-applicable due to the nature of the applicant Company (service provider); refer to Section 5 for applicability.

8.1 RECOGNITION OF THE CONCERNS AND ACCOMMODATION OF COMMUNITIES AFFECTED

- 8.1.1 <u>Identifying, contacting and responding to potentially affected stakeholders</u>: Any potentially affected stakeholder shall be identified and invited to express their concerns prior to any mineral exploration activities. The Company shall provide information and exchange mechanisms through a Company representative who shall be responsible for collecting, processing and responding within a maximum of 30 days.
- 8.1.2 <u>Claim acquisition notice</u>: Within 60 days of the claim acquisition (filed with the provincial ministry or acquired from another Company), the relevant local authority(ies) shall be informed of the claim acquisition and given the Company representative's contact information.
- 8.1.3 <u>Notice to local authorities commencement of work</u>: A minimum of 30 days before commencement of work, the relevant local authority(ies) shall be informed of work scope, location and timetable.
- 8.1.4 <u>Permission to access the land</u>: At least 30 days before the beginning of operations on a private property, the Company shall make an attempt to obtain a written agreement with the landowner or tenant, confirming permission to access the land and the conditions under which the mineral exploration activities will be conducted (nature and impacts of projected work, location, schedule, restoration, mitigation measures, engagement). Documentation shall be retained in situations where an agreement is not reached.
- 8.1.5 <u>Information sharing</u>: Information provided to potentially affected stakeholders shall meet the following requirements:
 - A Be understandable: Communicated in a language suited to the stakeholders, and outlined clearly
 - B Be relevant: Present a clear and direct link with the subject and be of importance to the stakeholders
 - C Be objective: Based on experience, realistic and free of personal interests
 - D Be timely: Communicated at the relevant time
 - E Be reliable: Based on credible sources and facts that can be validated
 - F Be truthful: Based on reality and not misleading
 - G Be complete: Not partial; presenting both positive and negative aspects
 - H Be precise: Focused and accurate
 - I Be accessible: Available to consult in a way that serves the
- 8.1.6 <u>Implementation of mitigation measures</u>: Mitigation of project-related impacts, as previously determined in consultation with affected stakeholders, shall apply.

- 8.1.7 <u>Remedial measure</u>: If the mitigation measures provided for in Clause 8.1.6 prove insufficient, the Company shall agree with affected stakeholders on a remedial measure proportional to the sustained impacts. If an agreement is impossible, the Company shall indicate why the demands of affected stakeholders have been rejected.
- 8.1.8 <u>Fulfilling commitments</u>: Commitments between the Company and potentially affected stakeholders shall be respected.

8.2 NOISE AND SENSORY ENVIRONMENT

8.2.1 <u>Consultation of local authorities</u>: When planning operations involving noisy machinery or the use of explosives, local authorities shall be consulted in order to identify and implement mitigation measures required to comply with local noise and sensory nuisance regulations.

8.3 QUALITY OF VISUAL ENVIRONMENT

8.3.1 <u>Quality of visual environment</u>: Measures to mitigate and remediate negative visual impacts that affect sites of interest identified by local authorities shall be applied.

8.4 HEALTH AND SAFETY OF THE COMMUNITY

- 8.4.1 <u>Risk identification and mitigation measures</u>: Prior to the beginning of operations, health and safety risks associated with mineral exploration shall be identified and a prevention plan shall be established.
- 8.4.2 <u>Emergency response procedures</u>: Prior to the beginning of operations, emergency response procedures for the health and safety risks identified shall be developed and implemented. If applicable, the risks identified and the procedures established shall be communicated to potentially affected stakeholders and Indigenous communities.

8.5 CULTURAL HERITAGE

8.5.1 <u>Respect for cultural heritage</u>: Protective measures to mitigate and remedy negative impacts on cultural heritage sites that are not protected by the legislation in force, and which are identified by Indigenous, local and regional governmental authorities, shall be implemented. A chance find procedure for cultural heritage sites shall be in place.

9. LOCAL PROCUREMENT

9.1 SELECTION OF LOCAL LABOUR

- 9.1.1 <u>Recruiting local labour</u>: When recruiting, the Company shall promote the selection of local labour, prioritizing Indigenous communities with equal qualification, and keep records of local recruitment efforts.
- 9.1.2 <u>Support and training</u>: Support and training measures shall be implemented in order to facilitate the integration of newly hired workers.

9.2 SELECTION OF LOCAL AND INDIGENOUS SERVICE PROVIDERS

9.2.1 <u>Recruiting local and Indigenous service providers</u>: The Company shall promote the selection of qualified and competitive local, regional and Indigenous service providers subject to price, availability, technical capability and equipment, and keep records of local recruitment efforts.

10. WORK ENVIRONMENT

10.1 OCCUPATIONAL HEALTH AND SAFETY

- 10.1.1 <u>Prevention program</u>: A prevention program intended to eliminate at the source all risks to the health, safety and physical well-being of workers shall be accessible and understood by all employees. The program shall address the following, if applicable:
 - A Occupational health and safety policy
 - B Roles and responsibilities of workers, supervisors and executives
 - C Disciplinary policy
 - D Procedures for newly hired employees
 - E Occupational health and safety training and information programs
 - F Programs for the adaptation of facilities and camp sites to the standards prescribed by the regulations for workplace infrastructure, work organization, equipment, materials, contaminants, hazardous substances, procedures and resources, and collective safety equipment
 - G Measures for monitoring work environment quality and preventive maintenance
 - H Procedures for the use of vehicles, equipment and machinery
 - I Procedures for specific operations
 - J Personal protective equipment for a specific type of work
- 10.1.2 <u>Emergency plan</u>: A plan describing procedures to be applied in case of emergency shall be accessible to and understood by all workers. The plan shall be reviewed, revised and tested annually. The emergency plan shall be developed and implemented in collaboration with local authorities, if applicable, and address the following:
 - A Evacuation plan (including camps)
 - B Accidental spills hazardous materials
 - C Evacuation and transportation of injured workers
 - D Missing workers

	F		Wilderness survival		
	G	;	Insect bites		
	Н	l	Wildlife		
	1		Allergies		
	J		First aid		
10.1.3 <u>Training</u> : All employees shall receive proper training and possess the required skil knowledge to safely perform the assigned work. An internal tracking system for training need be in place. Examples of training according to the types of operations include:					
	А		Workplace Hazardous Materials Information System (WHMIS)		
	В	,	Lockout		
	С	;	Transportation of hazardous materials		
	D)	Tree cutting		
	Е		First aid and cardiopulmonary resuscitation (CPR) (for at least two workers in the field)		
	F		Forklift		
	G	ì	Driving license		
	Н	I	Firearms license		
	I		Acquisition, possession, storage, transport and use of explosives		
	J		Blasting		
	K		Emergency procedures (wilderness survival, wildlife, evacuation, etc.)		
	L		Specific operations (working on ice, use of equipment, machinery and vehicles, etc.)		
	M	1	Helicopter safety training		
	N	I	Health and safety due diligence		
10.1.4 <u>Risk analysis</u> : Risk analysis exercises involving all concerned workers shall be carried out daily in order to identify potential hazards and actions required to ensure the health and safety of workers.					

Natural hazards (including forest fires, lightning, storm, cold, heat)

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- 10.1.5 <u>Communication</u>: A mechanism allowing employees and service providers to raise and discuss occupational health and safety issues shall be in place. One or more employees shall be designated as primary contact(s) for issues of health and safety and their names shall be displayed in visible and accessible locations.
- 10.1.6 <u>Supervision</u>: Employees shall have adequate supervision to accomplish their tasks. When a worker performs a task alone in an isolated area where it is impossible to request assistance, an effective periodic or constant monitoring method shall be implemented.
- 10.1.7 <u>Working on ice</u>: Work performed on ice shall be carried out in accordance with guidelines in the manual "Best Practice for Building and Working Safely on Ice Covers in Alberta" or similar guidelines if available in other jurisdictions.
- 10.1.8 <u>Particular elements</u>: Work performed in the search for minerals that may contain uranium shall be carried out according to the "Mineral Exploration Guidelines for Saskatchewan"³ or similar guidelines if available in other jurisdictions.

11. BUSINESS ETHICS

11.1 CORRUPTION PREVENTION

- 11.1.1 <u>Appointment of board members, executives and managers</u>: Appointed board members, executives and managers shall demonstrate conduct that complies with business ethics and legal requirements.
- 11.1.2 <u>Code of ethics</u>: The Company shall develop and implement a code describing its policies and procedures on organizational ethics. This document shall be accessible, understood and respected by management and employees, and shall address the following, unless justified otherwise:
 - A Governance procedures and practices
 - B Conflicts of interest, including transactions and agreements in respect of which an executive or manager has a material interest
 - C Protection and proper use of corporate assets and opportunities
 - D Confidentiality of corporate information
 - E Fair dealing with the issuer's security holders, clients, service providers, competitors and employees
 - F Compliance with laws, rules and regulations
 - G Disclosure of financial contributions and official public positions with regard to public policy (if applicable)

 $^{^2\} https://open.alberta.ca/dataset/612530c3-9f41-41f3-ad45-4b62b47a0b06/resource/74decde6-8120-46be-b137-b120-46be-b120-46be-b120-46be-b120-46be-b120-46be-b120-46be-b120-46be-b120-46be-b120-46be-b120-46be-b120-46be-b120-46be-b120-46be-b120-46be-b120-46be-b12$

¹⁵⁸bb63ee569/download/whs-pub-sh010.pdf

³ http://saskmining.ca/ckfinder/userfiles/files/BMP%20August%202016_Draft.pdf

- H Anti-harassment or anti-discrimination policy and procedures
- I Measures to be applied regarding illegal or unethical conduct
- 11.1.3 <u>Employee engagement</u>: Risks of corruption and ways to prevent them shall be identified in collaboration with employees and shall be part of the Company's ethical policies.
- 11.1.4 <u>Training</u>: Executives, managers and employees who are responsible for negotiating agreements shall be trained in business ethics to prevent all forms of corruption and discrimination.
- 11.1.5 <u>Monitoring</u>: A mechanism for employees and service providers to report confidentially and without fear of reprisal any illegal or unethical conduct shall be in place.

11.2 DIVERSITY AND ACCOUNTABILITY OF BOARD MEMBERS, EXECUTIVES AND MANAGERS

- 11.2.1 <u>Diversity and inclusion</u>: The Company shall develop a diversity and inclusion strategy aimed to counter barriers to employment and opportunity for advancement.
- 11.2.2 <u>Participation</u>: Board members, executives and managers shall be diligent about their participation in meetings and shall have all relevant information necessary for making informed decisions reasonably available in a timely fashion.
- 11.2.3 <u>Conflicts of interest</u>: Board members, executives and managers shall prioritize the Company's interests and remain independent from pressure or influence, prevent potential conflicts of interest, and forfeit all personal profits they may be liable to gain by virtue of their position.
- 11.2.4 <u>Investigation of irregularities</u>: Board members, executives and managers shall promptly investigate when they have knowledge of or suspect fraud or a breach of ethics and act according to their code of ethics.
- 11.2.5 <u>Training accountability:</u> Executives and managers shall complete governance training.

12. TRANSPARENCY AND REPORTING

12.1 INFORMATION SHARING

- 12.1.1 <u>Information sharing mineral exploration projects and continuous disclosure</u>: Information sharing regarding mineral exploration projects and ongoing disclosure shall comply with the applicable provincial and federal legislation such as provincial professional codes and applicable securities legislation for public companies.
- 12.1.2 <u>Information sharing shareholders</u>: Board members, executives and managers shall continuously disclose information to shareholders regarding their operations, including their governance practices and any event or changes that may affect the value of the Company.

13. INNOVATION

13.1 RESPONSIBLE USE OF TECHNOLOGIES

- 13.1.1 <u>Knowledge acquisition</u>: Acquisition of knowledge in terms of responsible technologies shall be promoted. Information monitoring of existing techniques to reduce environmental and social footprint as well as operational costs shall be conducted.
- 13.1.2 <u>Application of responsible technologies</u>: Best available technology economically achievable (BATEA) shall be used. The Company shall list the known BATEA and justify its rationale if it is not being used.

14. ECONOMIC EFFICIENCY

14.1 EFFICIENT USE OF FINANCIAL RESOURCES

- 14.1.1 <u>Financial analysis</u>: The public Company shall include periodic financial analysis based on continuous improvement through public disclosures. The private Company with outside investors shall be guided by similar disclosure practices.
- 14.1.2 <u>Environmental and liability insurances</u>: The Company shall have proper and sufficient environmental and liability insurances. Service providers shall carry appropriate environmental and liability insurance when field work is undertaken.
- 14.1.3 <u>Supply policy</u>: A supply policy optimizing the procurement of services, supplies and materials needed for the Company's operation shall be developed and implemented.
- 14.1.4 <u>Assessment of the appropriateness of continuation of operations</u>: The mineral exploration Company shall periodically conduct an evaluation on the appropriateness of the continuation of operations according to all risks associated with the development of the project.
- 14.1.5 <u>Use of flow-through share product</u>: The mineral exploration Company shall ensure compliance with the Income Tax Act as it relates to flow-through shares and Canadian exploration expenses (CEEs).