Howse Property Iron Ore Mine Project

Detailed IAAC Regulatory Requirements and Project Activities Schedule

LEGEND:	
Construction	(yellow)
Construction and Operation	(orange)
Operation	(red)
Closure and Post-Closure	(green)
Milestone - Planned	•
Milestone - Completed	✓

KEY PROJECT PHASES AND MILESTONES — PROJECT TIMELINE, PHASES AND MILESTONES (2025 Q1 – 2041 Q4) — ACTIVITIES BY PROJECT PHASE (Decision Statement Condition 10.2)

Milestone	Phase	Timeline	Description
Milestone - 1	Construction Start	2025 Q1 ✓	<u>Construction Commencement Date:</u> 23-Feb-2025 <u>Planned Construction Activities (Estimated Commencement to Completion):</u> • Snow-clearing **(February 2025 to March 2025)**; • Vegetation and shrub clearing **(February 2025 to March 2025)**; • Stockpiling of organic matter and topsoil **(February 2025 to March 2025)**; • Stripping and ground-clearing for construction of haul road, water management and first year planned pit excavation footprint **(February 2025 to March 2025)**; • Follow-up Programs and Plan execution - **activity schedule detail in table of IAAC Conditions (Decision Statement Condition 10.1).**
Milestone - 2	Construction and Operation Start	2025 Q2 •	<u>Planned Construction Activities (Estimated Commencement to Completion):</u> • Snow-clearing **(January to April and October to December, until 2027)**; • Vegetation and shrub clearing **(January to April and October to December, until 2027)**; • Stockpiling of organic matter and topsoil **(January to April and October to December, until 2027)**; • Construction of water management for surface runoff (Sedimentation Pond 3) **(April to October 2025)**; • Stripping and ground-clearing for planned expansion footprints of haul road, pit and water management (HowseA Sedimentation Pond) **(January to April and October to December, until 2027)**; • Construction of planned haul road, pit and water management expansions **(June to October, until 2027)**; • Overburden stockpiling by backfilling into Timmins 4 mining pit **(January to April and October to December, until 2027)**; • Upgrade of the Howse bypass road **(June 2025 to October 2027)**; • Follow-up Programs and Plan execution - **activity schedule detail in table of IAAC Conditions (Decision Statement Condition 10.1).** <u>Planned Operation Activities (Estimated Commencement to Completion):</u> • Pit development drilling and blasting **(Year-round, until 2027)**; • Waste rock removal and stockpiling by backfilling into Timmins 4 mining pit **(Year-round, until 2027)**; • Iron ore extraction from Howse pit and hauling of ore from Howse pit to DSO Timmins Wet and Dry Processing Plants **(Year-round)**; • Railing of finished iron ore products from facility to port **(Year-round, until 2027)**; • Maintenance activities on the Howse bypass roads **(June to October, until 2027)**; • Water management activities - collection, recycling and effluent discharge **(May to October, until 2027)**; • Progressive rehabilitation activities **(May to October, until 2027)**; • Follow-up Programs and Plans execution - **activity schedule detail in table of IAAC Conditions (Decision Statement Condition 10.1)**
Milestone - 3	Mining Phase I Completion	2029 Q4 •	<u>Planned Operation Activities (Estimated Commencement to Completion):</u> • Pit development drilling and blasting **(Year-round, until 2040)**; • Waste rock removal and stockpiling by backfilling into Timmins 4 mining pit or other available mining pits **(Year-round, until 2040)**; • Iron ore extraction from Howse pit and hauling of ore from Howse pit to DSO Timmins Wet and Dry Processing Plants **(Year-round, until 2040)**; • Railing of finished iron ore products from facility to port **(Year-round, until 2040)**; • Maintenance activities on the Howse bypass roads **(June to October, until 2040)**; • Water management activities - collection, recycling and effluent discharge **(May to October, until 2040)**; • Progressive rehabilitation activities **(May to October, until 2040)**; • Follow-up Programs and Plans execution - **activity schedule detail in table of IAAC Conditions (Decision Statement Condition 10.1).**
Milestone - 4	Mining Phase II Completion	2034 Q4 •	
Milestone - 5	Mining Phase III Completion	2040 Q4 •	
Milestone - 6	Closure and Post Closure Start	2041 Q1 •	**End of Project Operations Phase (December 2040) - Commencement of Project Closure Phase (January 2041 onwards).** Execution of final closure activities and implementation of post-closure monitoring measures.
CURRENT PHASE PROGRESSION		2025 Q1 ↑	

IAAC CONDITIONS AND DESCRIPTION — COMPLIANCE ACTIVITY TIMELINE (Decision Statement Condition 10.1) — COMPLIANCE ACTIVITIES (Decision Statement Condition 10.1)

2. General Conditions - IAAC

No.	Condition	Timeline	Description
2.1	Ensure actions meet conditions in a careful and precautionary manner, promote sustainable development, use best information including Indigenous knowledge	2025 Q1 ✓; • every quarter 2025 Q2 – 2041 Q4	TSMC will aim to ensure all phases of the Project are executed in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge available at the time, including community and Indigenous traditional knowledge, 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.
2.2	When consultation is required: provide written notice, provide sufficient information, undertake impartial consideration of views		Any consultation requirement will follow the Howse Project Communication Plan developed in consultation with the Indigenous groups and relevant authorities to include these mechanisms and processes during consultation.
2.3	Consult with Indigenous groups on manner of consultation including methods, information type, timing, and advising process		The Howse Project Communication Plan has been developed in consultation with the Indigenous groups and relevant authorities to define the consultation process and related information and will be engaged for the life of the Project.
2.4	For each follow-up program, determine methodology, location, frequency, timing, duration, reporting, thresholds		The Howse Project Follow-Up Programs have been designed to include all information required under the Decision Statement and will be maintained for the life of the Project.
2.5	Submit follow-up program information to Agency and update in consultation with Indigenous groups and authorities	2025 Q1 ✓	Follow-Up Programs have been submitted to the Agency and the Indigenous groups. Any required updates will be done in consultation with Indigenous groups and relevant authorities to maintain the documents for the life of the Project. **Completed: 15 January, 2025.**
2.6	Conduct follow-up programs according to determined info, verify assessment accuracy, determine if additional measures needed, implement additional mitigation measures as required		Follow-up Programs will be conducted as prescribed by the Decision Statement. If Follow-Up results determine that modified or additional mitigations are required, they will be implemented as required and their efficiency will be monitored. This process will be maintained for the life of the Project.
2.7	Discuss with Indigenous groups opportunities for participation in implementation of follow-up programs, including analysis and mitigation based on follow-up results.		The Howse Project Communication Plan includes quarterly meetings with Indigenous groups to allow their participation in the review of program results, analysis, feedback and mitigations. These mechanisms of the Communication Plan will be maintained for the life of the Project.
2.8-2.9	Prepare and submit annual report on compliance with conditions (due June 30 each year)	• Q2 of each year 2025 – 2041	Annual reports detailing all information required under conditions 2.8.1 to 2.8.6 will be prepared each year and submitted to the Agency by June 30. They will also be published on a publicly available platform simultaneously, as per Condition 2.10. **Estimated Completion: June, recurring annually.**
2.10	Publish reports and documents on Internet and keep publicly available for 25 years		All required documentation will be published on a publicly available platform where it will remain available for 25 years following completion of the Project.
2.11	Notify Agency and Indigenous groups of ownership transfer (within 60 days)		Conditional requirement for life of project - to be carried out within 60 days if transfer of ownership occurs.
2.12-2.13	Consult with Indigenous groups prior to material changes and notify Agency with description of effects		Indigenous groups will be consulted prior to initiating any material change(s) that may have adverse environmental effects. The Agency will be notifyied and provided with all required information if such changes are required. The consultation process will be engaged as defined in the Howse Project Communication Plan for the life of the Project.

3. Fish and Fish Habitat - IAAC

No.	Condition	Timeline	Description
3.1	Implement erosion and sedimentation control measures to avoid deposit of deleterious substances	• Q2, Q3, Q4 of each year 2025 – 2041	Appropriate erosion and sediment control measures will be deployed whenever work occurs in areas where sediment or any other deleterious substance may reach fish bearing waters during the life of the Project. **Estimated Completion: Spring to Fall months, recurring annually.**
3.2	Collect site runoff and pit dewatering water in sedimentation ponds and treat prior to discharge if necessary	• Q2, Q3, Q4 of each year 2025 – 2041	Surface runoff for the Howse Project will be conveyed to Sedimentation Pond 3 via ditches and/or pumping during the Construction and initial stages of the Operations phase. The surface runoff collected in Sedimentation Pond 3 will be recycled by pumping to the Timmins 2 or Timmins 6 Pit for ultilization by the Concentrate Process Plant to avoid effluent discharge in Goodream Creek. The HowseA Sedimentation Pond will be constructed, in scaling with the Project future expansion footprint, to receive and treat pit dewatering water volumes and additional surface runoff prior to effluent discharge in Goodream Creek. If results of discharged effluent exceed any applicable MDMER thresholds, coagulants or other applicable physical or chemical water treatment options will be implemented. **Estimated Completion: Spring to Fall months, recurring annually.**
3.3	Use time delay blasting technique for all blasting activities	2025 Q1 ✓; • every quarter 2025 Q2 – 2040 Q4	Use of time delay blasting technique will be followed as standard practice for all blasts during the life of the Project. **Estimated Execution: All year round.**
3.4	Do not set blast charge per delay above 1092 kilograms	2025 Q1 ✓; • every quarter 2025 Q2 – 2040 Q4	Setting of blast charge per delay below 1092 kilograms will be followed as standard practice for all blasts during the life of the Project. **Estimated Execution: All year round.**
3.5	Manage waste rock acid generation during operation per Mine Environment Neutral Drainage Program	2025 Q1 ✓; • every quarter 2025 Q2 – 2040 Q4	Waste rock sampling program, in compliance with the Mine Environment Neutral Drainage Program, will be initiated as soon as waste rock extraction begins to confirm the predicted absence of Acid Rock Drainage and Metal Leaching potential. If potentially acid generating waste rock is discovered, it will be managed separately as per applicable guidelines and regulations. **Estimated Execution: All year round.**
3.6	Develop and implement follow-up program for fish and fish habitat	2025 Q1 ✓	The Howse Project Fish And Fish Habitat Follow-Up Program has been developed and will be implemented for the life of the Project. Further updates to the Program, if required, will be carried out in consultation with Indigenous groups and relevant authorities. **Completed: 15 January, 2025.**
3.6.1.1-5	Monitor water quality and quantity parameters per Water Management Plan	• Q2, Q3, Q4 of each year 2025 – 2041	3.6.1.1 - Baseline monitoring using water level probes was started in 2017 and will continue for the life of the Project. 3.6.1.2 - Groundwater level and water quality monitoring sampling will be conducted 4 times annually from Spring to Fall months for the life of the Project. 3.6.1.3 and 3.6.1.4 - Water quality monitoring at the final discharge points will start as soon as effluent is deposited and will continue for the duration of the project whenever effluent is being deposited as per MDMER requirements. 3.6.1.5 - Baseline water quality monitoring was started in 2015 and will continue to be conducted 4 times annually from Spring to Fall months for the life of the Project If any of the thresholds described in the follow-up plan are exceeded, appropriate mitigation measures will be put in place. **Estimated Completion: Spring to Fall months, recurring annually.**
3.6.2	Update hydrogeological groundwater model at end of mining phases I, II, and III	• 2030 Q1; 2035 Q1; 2041 Q1	Updates will be done using data collected through the groundwater monitoring program at the end of scheduled Project mining phases I, II and III. **Estimated Completion: March 2030, March 2035 and March 2041.**
3.6.3	Monitor fish and fish habitat in Triangle Lake, Burnetta Lake, Pinette Lake and Goodream Creek	• Q2, Q3, Q4 of each year 2025 – 2041	Biological studies will be carried out as per MDMER requirements as soon as effluent discharge into Goodream Creek occurs. If effects on fish population, on fish tissue or on the benthic invertebrate community has been identified, suitable mitigation measures will be conceived and deployed with the approval of the Agency and relevant authorities. Weekly visual surveys will be done at Pinette Triangle and Burnetta lakes to detect any fish mortality whenever there is blasting . If blasting mortality is confirmed, the blasting protocol will be reviewed and updated to include mitigations. **Estimated Completion: Spring to Fall months, recurring annually.**

4. Migratory Birds - IAAC

No.	Condition	Timeline	Description
4.1	Carry out project to protect migratory birds per Environment and Climate Change Canada's Avoidance Guidelines	• Q2, Q3 of each year 2025 – 2041	Stripping activities as well as any other activity that could potentially affect bird nests will be planned outside of the migratory bird nesting season. If such activities are required during the nesting season, nest surveys will be carried out by a qualified individual and appropriate buffer zones will be established around any nests that may be found. Climate Change Canada's Avoidance Guidelines to protect migratory birds will be adhered to for the life of the Project. **Estimated Completion: Spring to Fall months (Early May to September), annually.**
4.2	Have qualified individual survey pit walls for bank swallows annually and establish setbacks if nests found	• Q2 of each year 2025 – 2040	Survey will be conducted in mid to late June as swallows have been known to arrive and begin nesting in that period. This will be adapted if migratory habits become modified due to climate change. These measures will be maintained for the life of the Project. **Estimated Completion: June, annually.**
4.3	Notify Environment and Climate Change Canada if bank swallow nests are found		ECCC will be notified immediately if bank swallow nests are found in the Project area for the life of the Project.
4.4	Control lighting to avoid effects on migratory birds while meeting health and safety requirements	• Q2, Q3 of each year 2025 – 2041	Lighting position, wavelengths, illumination levels and duration of illumination at the Project will be selected and adjusted to avoid effects on migratory birds while also maintaing the health and safety requirements for the life of the Project. **Estimated Completion: Spring to Fall months (Early May to September), annually.**
4.5	Prohibit vehicles and equipment from entering wetlands except those already affected	2025 Q1 ✓; • every quarter 2025 Q2 – 2041 Q4	Prohibiton on vehicle and equipment entry into undisturbed wetlands will be enforced for the life of the Project. **Estimated Execution: All year round.**
4.6	Prohibit cleaning, fueling, maintenance, and storage of harmful substances within 20m of wetlands	2025 Q1 ✓; • every quarter 2025 Q2 – 2041 Q4	Prohibition of cleaning, fueling, maintenance, and storage of harmful substances within 20m of wetlands will be enforced for the life of the Project. **Estimated Execution: All year round.**
4.7	Develop and implement follow-up program for migratory bird mitigation effectiveness	2025 Q1 ✓	The Howse Project Avifauna Follow-Up Program has been developed and will be implemented for the life of the Project. Further updates to the Program, if required, will be carried out in consultation with Indigenous groups and relevant authorities. **Completed: 15 January, 2025.**
4.7.1	Conduct migratory bird surveys in specified watersheds for first three years after construction	• 2028 Q2; 2029 Q2; 2030 Q2; 2035 Q2; 2040 Q2	Surveys will be conducted by qualified individuals and results will be compared with the baseline surveys to detect potential changes to nesting migratory bird populations and determine effectiveness of mitigation measures. Subsequent surveys following the 3 initial surveys are currently planned every 5 years. If required, this frequency will be modified following results of the initial surveys in consultation with Indigenous groups and relevant authorities. **Estimated Completion: June 2028, 2029, 2030, 2035 and 2040.**
4.8	Develop and implement follow-up program for wetland functions that support migratory birds	2025 Q1 ✓	The Howse Project Wetland Follow-Up Program has been developed and will be implemented for the life of the Project. Further updates to the Program, if required, will be carried out in consultation with Indigenous groups and relevant authorities. **Completed: 15 January, 2025.**
4.8.1	Conduct wetland disturbance survey every five years (first at start of construction)	• 2025 Q3; 2029 Q3; 2034 Q3; 2039 Q3	Surveys will be conducted by qualified individuals and results will be compared with the baseline surveys to detect potential harmful effects to wetland functions that support nesting migratory bird populations and determine effectiveness of mitigation measures. . **Estimated Completion: July 2025, 2029, 2034 and 2039.**
4.8.2	Monitor groundwater levels near wetlands every two weeks during operation	• Q2, Q3, Q4 of each year 2025 – 2040	Wetland groundwater level monitoring is already in place with baseline measurements collected since 2018. The program will continue to be conducted during summer months for the duration of the Project. **Estimated Completion: Spring to Fall months (June to September every two weeks), annually.**

IAAC CONDITIONS AND DESCRIPTION		COMPLIANCE ACTIVITY TIMELINE (Decision Statement Condition 10.1)																																																																	COMPLIANCE ACTIVITIES (Decision Statement Condition 10.1)
5. Health and Socio-Economic Conditions - IAAC		2025				2026				2027				2028				2029				2030				2031				2032				2033				2034				2035				2036				2037				2038				2039				2040				2041				**Description**
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
5.1	Undertake progressive reclamation of disturbed areas in consultation with Indigenous groups																																																																					TSMC will engage in progressive reclamation for the Project as areas in their final footprints become available to undertake these activities, in consultation with Indigenous groups, for the life of the Project. Progressive reclamation activities will involve stabilization of areas and revegetation using only native plants.
5.2	Design overburden and waste rock piles to reduce effects to viewscapes																																																																					TSMC will continue to optimize and reduce the effective volume and shapes of overburden and waste rock piles to reduce effects to the viewscapes in the vicinity for the life of the Project. Overburden and waste rock removal operations during the initial development of the Howse pit will utilize the Timmins 4 pit, near the Howse property, for backfilling. TSMC will continue to identify and ultilize any other exhausted mining properties in the vicinity of the project to further optimize the environmental footprint of the Howse overburden and waste rock and their effects to viewscapes.
5.3	Apply dust suppressant on haul road to control dust release		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•	TSMC will apply dust suppressants such as approved chemicals and water additives on the haul road to control and limit dust emissions for the life of the Project. **Estimated Execution: Spring to Fall months (Early May to September), annually.**
5.4	Control dust during ore unloading, if observed visually (except if not feasible for safety reasons)																																																																					Appropriate dust control measures will be implemented for unloading of ore from, if dust is observed visually, during the life of the Project.
5.5	Implement dust emission measures at conveyor transfer points, drum scrubber, crushers, and dryers																																																																					Measures to reduce dust at conveyor transfer points, drum scrubber, crushers, and dryers such as water spray, baggers, precipitators and enclosures are implemented and will remain in place for the life of the Project.
5.6	Fill borehole necks with clean crushed rock to reduce dust and gas emissions from blasting																																																																					Filling of borehole necks with clean crushed rock to reduce dust and gas emissions from blasting will be followed as standard practice for all blasts during the life of the Project.
5.7	Develop and implement dust management strategy for road to Schefferville	✓	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	The Howse Project Dust Management Strategy has been developed and will be implemented for the life of the project. Further updates to the Strategy, if required, will be carried out in consultation with Indigenous groups, relevant authorities and the Town of Schefferville. Some aspects of the strategy are already in place as part of previous commitments (shuttle buses, requirement to wash vehicles before travel to town). **Estimated Execution: All year round.**
5.8	Implement incentive measures to reduce number of vehicles (e.g., shuttle buses)	✓	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	Daily shuttle buses are utilized for employee transit from the Town of Schefferville, Kawawachikamach and Matimekush as well as all rotation change days for Fly-In-Fly-Out employees. These shuttles will remain in service for the life of the Project. **Estimated Execution: All year round.**
5.9	Develop and implement follow-up program for air quality and dust effects	✓																																																																				The Howse Project Ambient Air Quality Follow-Up Program has been developed and will be implemented for the life of the Project. Further updates to the Program, if required, will be carried out in consultation with Indigenous groups and relevant authorities. **Completed: 15 January, 2025.**
5.9.1	Monitor air quality at receptors R3, R9, R10, R16, R18, R24, R36, R38 and R40		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•	Air quality monitoring will be performed from Spring to Fall months as long as weather conditions allow. Dustfall and SO_2 samplers will be set up at each location for monthly samples. Particulate matter and CO will be monitored periodically with Aeroqual AQS1 monitors. If exceedances are detected, appropriate mitigation measures will be put in place. These air monitoring activities will remain in place for the life of the Project. **Estimated Completion: Spring to Fall months (June to October), annually.**
5.9.2	Monitor dust generation using dust tracking system and mobile monitoring equipment		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•	WIll be done a conditional basis if areas outside of the Project, other than the receptors already considered for monitoring as part of the follow-up plan, are affected by dust. Depending on type and duration of dust events, optical dust trackers such as the Aeroqual AQS1 and/or dustfall monitoring equipment will be used. This mechanism will remain in effect for the life of the Project. **Estimated Completion: Spring to Fall months (June to October), annually.**
5.9.3	Analyze contaminant concentrations in dust (min. once between Jun-Aug yearly)		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•		•	•	•	Analysis of contaminant concentrations in dusts will be done monthly from Spring to Fall by analyzing heavy metals concentrations in samples collected in dustfall jars. These sampling activities will remain in place for the life of the Project. **Estimated Completion: Spring to Fall months (June to October), annually.**
5.9.4	Implement modified or additional mitigation measures if follow-up results demonstrate they are required at plant, roads, or stockpiles																																																																					Modification to existing measures or addtional measures will be deployed in applicable areas if the results of the air quality follow-up program demonstrates they are required during the life of the Project.
5.10	Develop and implement follow-up program for country foods	✓																																																																				The Howse Project Country Foods Follow-Up Program has been developed and will be implemented for the life of the Project. Further updates to the Program, if required, will be carried out in consultation with Indigenous groups and relevant authorities. **Completed: 15 January, 2025.**
5.10.1-4	Sample country food species (inc. fish) for contaminants starting 2 years after operation											•																				•																				•																Baseline sampling for this program was conducted in 2015. Results of the future samples will be compared with baseline samples to determine if any increase in contaminants has occured. In the event of increases of contaminants in any of the country foods, TSMC will conduct a new Human Health Risk Assessment and a targeted action plan (results-dependent) will be also be implemented. **Estimated Completion: Summer months (July to Sept) 2027, 2032 and 2039.**
6. Current Use of Lands and Resources - IAAC		2025				2026				2027				2028				2029				2030				2031				2032				2033				2034				2035				2036				2037				2038				2039				2040				2041				**Description**
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
6.1	Upgrade and maintain bypass road around project for Indigenous access to Pinette Lake, Kauteitnat and Howells River Valley		•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•		Required upgrades will be done in 2025 after the spring freshet and maintenance activities will be conducted in late summer. Maintenance activities in subsequent years will be conducted as required after the spring freshet and in late summer, as well as on an as-needed basis in case of damages caused by extreme weather events. Escort service from the Security Gate to the road linking Pinette Lake, Kauteitnat and Howells River Valley will also be maintained for members of Indigenous communities who do not wish to use the bypass road to access these areas. These measures will remain in place for the life of the Project. **Estimated Completion: Spring to Fall months (June to October), annually.**
6.2	Upgrade and maintain bypass road around DSO4 area for Indigenous access to hunting grounds		•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•		
6.3	Do not use bypass roads for project activities (except for maintenance or emergency)	✓	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	Access to some of the monitoring points included in the Follow-Up Programs will require minimal travel on the bypass roads by TSMC Environment staff. Prohibition on the use of the bypass road by TSMC vehicles and employees will remain in effect for the life of the Project. Apart from periodic road maintenance activites as per condition 6.1 and 6.2, no other Project activities using the bypass roads will be permitted.
6.4	Prohibit employees and contractors from fishing and hunting in project area	✓	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	As per TSMC policy, employees and contractors (other than local Indigenous land users) are prohibited from fishing, hunting or interfering with wildlife in any manner in all areas. This is communicated to all site personnel during the employee induction process and through periodic reminders. This policy will be enforced for the life of the Project.
6.5	Consult NL Department if caribou observed within 20km radius of pit or plant																																																																					The NL Department of Fisheries, Forestry and Agriculture (formerly known as the Department of Fisheries and Land Resources) will be contacted immediately if Caribou are observed within a 20km radius of any Project components. This mechanism will remain in effect for the life of the Project.
6.6	Develop and implement follow-up program for land use for traditional purposes	✓																																																																				The Howse Project Follow up Program for Current Use of Land has been developed and will be implemented for the life of the Project. Further updates to the Program, if required, will be carried out in consultation with Indigenous groups and relevant authorities. **Completed: 15 January, 2025.**
6.7	Develop and implement follow-up program for effects on George River caribou herd	✓																																																																				The Howse Project Caribou Follow up Program has been developed and will be implemented for the life of the Project. Further updates to the Program, if required, will be carried out in consultation with Indigenous groups and relevant authorities. **Completed: 15 January, 2025.**
6.8	Develop and implement communication plan with Indigenous groups	✓																																																																				The Howse Project Communication Plan has been developed and will be implemented for the life of the Project. Further updates to the Plan, if required, will be carried out in consultation with Indigenous groups and relevant authorities. **Completed: 15 January, 2025.**
6.8.1	Share project activity information, including blasting schedules (min. 48hrs in advance)	✓	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	Blasting schedule will be provided 48 hours in advance as standard practice for all blasts during the life of the Project. **Estimated Completion: 48 hours in advance of every blast event, all year round.**
6.8.2	Share follow-up activities and monitoring results from all follow-up programs with Indigenous groups																																																																					Procedures to share follow-up activities and monitoring results from all follow-up programs are included in the Communication Plan which will be implemented for the life of the Project.
6.8.3	Share information on access restrictions, including location, timing, alternate routes, and bypass road maintenance timing																																																																					Procedures to share information on access restrictions, including location, timing, alternate routes, and bypass road maintenance activities timing are included in the Communication Plan which will be implemented for the life of the Project.
6.9	Develop and implement feedback procedures for Indigenous groups	✓																																																																				Feedback procedures regarding any potential adverse environmental and social effects of the Project are included in the Communication Plan which will be implemented for the life of the Project.
7. Physical and Cultural Heritage - IAAC		2025				2026				2027				2028				2029				2030				2031				2032				2033				2034				2035				2036				2037				2038				2039				2040				2041				**Description**
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
7.1	Refrain from blasting for 24hrs when Kauteitnat use planned (when requested by Indigenous groups)																																																																					Blasting will be delayed for 24 hours to accommodate requests from the Indigenous communities plainning use of Kauteitnat during the life of the Project.
7.2	No activities south of water diversion ditch except for ditch work; identify exclusion zone with signage		•																																																																			No activities are planned south of the water diversion ditch for the whole duration of the project. Exclusion signage will be maintained to ensure no unplanned activities occur south of the ditch for the life of the Project. **Estimated Completion: June, 2025**
7.3	During Jun-Sep, limit blasting to max twice per week and five times per month		•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•						Blasting will be limited to max twice per week and five times per month as standard practice for all blasts during the life of the Project. **Estimated Execution: June to September, annually.**
7.4	Develop and implement protocol for receiving noise complaints; respond within 48hrs	✓																																																																				The protocol for receiving and responding to noise complaints is included in the Communication Plan and will be maintained for the life of the Project. **Completed: 15 January, 2025.**
7.5	Develop and implement follow-up program for noise effects on cultural site use	✓																																																																				The Howse Project Noise Follow-Up Program has been developed and will be implemented for the life of the Project. Further updates to the Program, if required, will be carried out in consultation with Indigenous groups and relevant authorities. **Completed: 15 January, 2025.**
7.5.1	Monitor noise levels at receptor sites R9, R10, R11, R13 and R24		•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•			•	•						Noise monitoring will be performed annually during the Spring to Fall months. If exceedances are detected, appropriate mitigation measures will be put in place. These noise monitoring activities will remain in place for the life of the Project. **Estimated Completion: Spring to Fall months (June to October), annually.**
7.6	Develop and implement cultural heritage control plan	✓																																																																				The Howse Project Cultural Heritage Control Plan has been developed and will be implemented for the life of the Project. Further updates to the Plan, if required, will be carried out in consultation with Indigenous groups and relevant authorities. **Completed: 15 January, 2025.**
7.6.1-5	Follow protocol if heritage resources discovered (halt work, delineate area, inform Indigenous groups, conduct assessment)																																																																					The protocol described in the cultural heritage control plan will be strictly followed in case of discovery of any previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance are discovered within the Designated Project or in any area within other TSMC projects. This protocol will remain in place for the life of the Project.
8. Cumulative Effects and 9. Accidents, Schedules & Records - IAAC		2025				2026				2027				2028				2029				2030				2031				2032				2033				2034				2035				2036				2037				2038				2039				2040				2041				**Description**
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
8.1	Participate in regional initiatives for cumulative effects monitoring if requested																																																																						TSMC will participate in any such initiaves if requested by a relevant authority or by local stakeholders during the life of the Project.
9.1-9.2	Take measures to prevent accidents and develop accident response plan	✓	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	Reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects will be taken into consideration during all phases of the Project. The Howse Project Accidents and Malfunctions Response Plan has been developed to identify and prevent specific accidents and malfunctions that may result in adverse environmental effects. The Plan will be implemented for the life of the Project. Further updates to the Plan, if required, will be carried out in consultation with Indigenous groups and relevant authorities. **Estimated Execution: All year round.**
9.3	Review and update accident response measures and plan prior to operation	✓																																																																				The Howse Project Accidents and Malfunctions Response Plan was reviewed and updated in January 2025 prior to start of construction and operations for the Project. **Completed: 15 January, 2025.**
9.4	In event of accident, implement response plan, notify parties, submit written reports																																																																					Notification, response and reporting of all accidents and malfunctions will be conducted in accordance with the measures and timelines described in the Howse Project Accidents and Malfunctions Response Plan for the life of the Project.
9.5	Develop and implement communication plan for accidents and malfunctions	✓																																																																				The Howse Project Communication Plan has been developed to include specific procedures and timelines to notify and share information on accidents and malfunctions. These procedures will be implemented for the life of the Project. **Completed: 15 January, 2025.**
10. Schedules and 11. Record Keeping - IAAC		2025				2026				2027				2028				2029				2030				2031				2032				2033				2034				2035				2036				2037				2038				2039				2040				2041				**Description**
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
10.1-10.2	Submit detailed schedules to Agency within 30 days of construction start	✓																																																																				Detailed schedule of compliance activites to fulfill each condition (Condition 10.1) and schedule of activities required for all phases of the Project (Condition 10.2) was submitted to the Agency in March 2025 within 30 days of Project construction start. **Completed: March 18, 2025.**
10.3	Submit annual schedule updates by June 30 each year		•				•				•				•				•				•				•				•				•				•				•				•				•				•				•				•				•			Updated schedules will be prepared and submitted to the Agency by June 30 annually with the Howse Project Annual Report. Updated schedules will also be published on a publicly available platform simultaneously, as per Condition 2.10. **Estimated Completion: June, recurring annually.**
10.4	Provide revised schedules to the Agency if any changes are made to the initial schedules or subsequent updates																																																																					Revised schedules will be provided to the Agency if any changes are made to the initial or updated schedules during the life of the Project.
11.1-11.2	Maintain compliance records at facility in Canada for 25 years post-operation and provide to Agency if requested. Notify Agency of new physical facility location at least 30 days prior to change.																																																																					Compliance records will be maintained in TSMC servers located in Canada for 25 years post-operation and provided to Agency if requested during the life of the Project. During this period, TSMC will notify the Agency of transfer of records to a new physical facility location at least 30 days prior to change.