2025 QIA-NWB ANNUAL REPORT

2025 Qikiqtani Inuit Association and
Nunavut Water Board
Annual Report for Operations

2025 ᖁᑭᖅᑕᓂ ᐃᓄᐃᑦ ᑲᑎᒪᔨᖏᑦᑐᖅᑎᑦ
ᓄᓇᕗᒻᒥ ᐃᒪᓕᕆᔨᑦ
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Water License 2AM-MRY2540
Amendment No.1 and Commercial
Lease Q13C301

ᖃᓄᐃᑦᑑᓂᖅᓚᐅᑉ ᐃᒥᐊᓗᑦ ᓯᐱᓴᔪᒥ - 2AM-MRY2540 - ᐊᖅᑭᒋᐊᒋᑎᓇᓴᐅᒡᒎᖅᑐᑦ ᐊᒻᒪᓗ ᓴᖅᒥᓂᕆᐅᔪᓄᑦ ᐊᑐᖅᑐᐊᖏᓂᖅᓗᑦ ᓴᓴᐅᒡᒎᖅ Q13C301

March 31, 2026 | ᒪᑦᔪ 31, 2026

Baffinland

Baffinland Iron Mines Corporation

Mary River Project

2025 QIKIQTANI INUIT ASSOCATION (QIA) AND NUNAVUT WATER BOARD (NWB) ANNUAL REPORT FOR OPERATIONS

REV 0

2026-03-31	0	William Bowden	
		William Bowden	Lou Kamermans
Date	**Rev.**	**Prepared By**	**Reviewed and Approved By**

TABLE 0: REPORT SUBMISSION SUMMARY

Year of Annual Report	2025
Annual Report Submission Date	March 31, 2026
Name and contact information of the Baffinland representative responsible for the preparation and approval of the Annual Report	**Lou Kamermans** Lou.Kamermans@baffinland.com T: 647 278 3317
The name and contact information of the Baffinland representative that QIA can contact should it have any questions or comments regarding the Annual Report	**Lou Kamermans** Lou.Kamermans@baffinland.com T: 647 278 3317

2025 QIKIQTANI INUIT ASSOCATION (QIA) AND NUNAVUT WATER BOARD (NWB) ANNUAL REPORT FOR OPERATIONS

EXECUTIVE SUMMARY

This report to the Qikiqtani Inuit Association (QIA) and the Nunavut Water Board (NWB) summarizes the activities and environmental monitoring completed in 2025 at the Mary River Project (the Project) under Baffinland Iron Mines Corporation's (Baffinland) Type 'A' Water Licence and the Commercial Lease with QIA. A separate annual report has also been prepared for the QIA and NWB that summarizes the 2025 exploration and geotechnical activities completed under Baffinland's Type 'B' Water Licence and Commercial Lease.

In 2025 Baffinland decreased ore transportation compared to previous years operations under the Production Increase Proposal and Sustaining Operations Proposal Approvals. In 2025 Baffinland returned to Early Revenue Phase transportation limits of 4.2 Mtpa. Mining and hauling activities from the Mine Site to Milne Port continued throughout 2025, with 4.2 Mt of iron ore hauled using the Tote Road and stockpiled at Milne Port. The transportation activities required to transport the stated volumes remained within those presented and assessed in the ERP FEIS Addendum

Mining operations and Project infrastructure development continued throughout 2025. The Project completed the public hearing process for renewal of the Type A Water Licence in March and was issued 2AM- MRY2540 on June 9 2026. The main activities completed under the Type 'A' Water Licence and the Commercial Lease are described below by Project area.

Mine Site

At the Mine Site, the main Project activities included:

- Mining of Deposit No. 1 and crushing and stockpiling of the ore at the KM 106 Stockpile Facility and the Mine Site Crusher Facility;
- Placement of inert non-hazardous waste at the Mine Site Non-Hazardous Waste Landfill Facility (Landfill Facility);
- e Placement of waste rock from Project operations at the Waste Rock Facility while continuing operation and monitoring at the Waste Rock Facility Pond (MS-08) to ensure discharged water meets applicable criteria;
- Placement of NAG construction grade material for construction of a Mine Site Laydown Area adjacent to the crushing facilities where aggregate is produced;
- Maintained and replaced surface water drainage systems, like culverts, to reduce potential erosion and sedimentation and improve water drainage across site;
- Water was discharged and monitored from licenced water management infrastructure;
- Completed required monitoring programs as per Type 'A' Water Licence and MDMER requirements;
- Continued upgrades and adaptive management at the KM 105 Facility, including constructing a filter berm, to ensure discharged water meets water licence limits at the new approved discharge location;

- Operation of aircraft logistics to supply the Project with personnel and supplies;
- Utilised and tracked water for domestic and industrial purposes at approved sources;
- Erosion and sediment potential was assessed across the site and appropriate preventative and corrective controls were implemented; and
- Application of dust suppression at the Crusher Facility to reduce dust during ore loading and transport.

Tote Road

Along the Tote Road, the main Project activities included:

- Transportation of ore using ore haul trucks from the Mine Site to Milne Port for stockpiling;
- Transportation of fuel and other supplies from Milne Port to the Mine Site to support operations and development;
- Maintenance work was conducted on the Tote Road and associated infrastructure to maintain the running surface and stability, improve water drainage and address safety and operational concerns, that did not involve in-stream work;
- Preventative and corrective measures were performed to mitigate potential sedimentation and erosion concerns, including but limited to armouring and modifying embankment grades, installing check dams and silt fences, and clearing snow and ice from sensitive water conveyance structures.;
- Progressive reclamation of priority historic borrow sources continued;
- Development of the Km 97 Borrow Source continued for material for Project use;
- Dust suppression using calcium chloride and water was applied regularly to Project roads utilising approved sources;
- Completed required monitoring programs under applicable management plans;
- Geotechnical and hydrological investigations on select water crossings; and re-construction work for various fish-bearing culvert crossings along the Tote Road progressed.

Milne Port

At Milne Port, the main Project activities included:

- Continued stockpiling of ore at the Milne Port Ore Stockpile Facility prior to and following the 2025 shipping season;
- Shipping of ore to international markets via the Milne Port Shiploader and ore carrier vessels;
- Application of dust suppression at the Milne Port ore stockpiles;
- Waster was discharged and monitored from licenced water management infrastructure;
- Completed required monitoring programs as per Type ‘A’ Water Licence;
- Utilised and tracked water for domestic and industrial purposes at approved sources;
- Use of blasted material from the Q1 Quarry;
- Multiple sealifts, including shipments off the Project to Southern Canada and the delivery of fuel, equipment, and supplies to support Project operations and development; and
- Erosion and sediment potential was assessed across the site and appropriate preventative and corrective controls were implemented.

Key Modifications to Project Infrastructure

No new significant structures associated with approved modifications were implemented in 2025. Work associated with approved modifications carried out at the Project in 2025 included:

- Modification No.11 – Installation of an Incineration Unit at Milne Port's 380-Person Camp

Due to the results of the initial and follow up stack testing, Baffinland did not commission the incinerator unit at the 380-Person Camp and, in 2025, the unit was dismantled from future service.

- Modification No. 13 – Mine Site water management infrastructure (NWB, 2021)

Baffinland employed a new treatment strategy at the KM 105 Facility and constructed new water management infrastructure following adaptive management response summarised within the KM 105 End of Year Summary Report. To support new water management infrastructure within the KM 105 valley and improvements to monitoring capabilities and treatment capacity, MS-11 was relocated (as submitted within the 2024 Annual report modification request) to the proposed new monitoring location downstream of the KM 105 valley water management infrastructure. In addition, engineering remains ongoing for future water management infrastructure within the Facility. During 2025, three (3) additional filter berms were constructed and armouring was placed within designated priority areas and water bodies. Planning and engineering for SDLT-1 will continue in alignment with future Steensby infrastructure engineering and construction.

Spills

During 2025, ten spills were reported to the Northwest Territories-Nunavut (NT-NU) Spill Report Line. In addition to the original spill report submitted within 24 hours of each spill event in 2025, a detailed follow-up report was submitted within thirty (30) days of each reported spill. Baffinland investigated the causes of all spills that occurred on site in 2025 so that effective long-term corrective actions could be taken to help prevent similar incidents in the future. Of the ten (10) spills reported to the NT-NU Spill Report Line, seven (70%) of them occurred at the Mary River site, two (20%) occurred at Milne Port, and one (10%) occurred along the Tote Road. The frequency of reportable spills in 2025 were as follows: sediment-laden water (3), untreated sewage (3), water (treated or raw) (2), hydraulic oil (1), and Arctic Diesel fuel (1).

Water Use and Freshwater Monitoring

Under the authorization of the Type 'A' Water Licence, freshwater was withdrawn during 2025 for three (3) main purposes at the Project: potable water supply (domestic), dust suppression, and other industrial purposes. There were no exceedances of the daily withdrawal limits for domestic and industrial water uses in 2025. There were also no water withdrawal exceedances of the daily withdrawal limits for water withdrawn for dust suppression in 2025. This is a significant decrease from historical exceedances recorded from 2022 to 2024. This reduction is attributed to strengthened procedural controls, including shift-based (day and night) tracking of daily water use at each authorized withdrawal point relative to applicable daily limits.

Throughout 2025, Baffinland conducted required monitoring under the Surveillance Network Program (SNP) as set out in Schedule I of the Type 'A' Water Licence, analyzing effluents discharged to the receiving environment and monitoring surface water quality as per licenced monitoring stations. Water retention facilities were evaluated prior to discharge to ensure compliance with applicable licence criteria as possible. One (1) exceedance of water licence criteria occurred in 2025: Total Suspended Solids (TSS) was slightly above the water licence criteria in a sample collected at the KM 105 Facility (MS-11) which operates as a continuous flow through facility. Follow-up sampling documented that TSS levels quickly returned to acceptable levels, after implementing a combination of new and previously installed treatment measures, and remained compliant through to the end of the year when flow was present. Baffinland continues to assess and implement measures at the Facility.

In addition to the SNP, other environmental monitoring programs were completed in 2025. These included the Project's Aquatic Effects Monitoring Plan (AEMP) and Tote Road Monitoring Program (TRMP), Terrestrial Environment Mitigation and Monitoring Plan (TEMMP), Air Quality and Noise Abatement Management Plan (AQNAMP) and the Marine Environmental Effects Monitoring Plan (MEEMP). These programs were carried out in accordance with the approved Project Certificate.

Community Consultations and Engagement

In 2025, Baffinland's Community & Strategic Development (CSD) and Sustainable Development (SD) teams continued to engage with communities in relation to the Mary River Project, including the Steensby Component. The company held in-person and virtual meetings, prioritizing face-to-face connections where possible, to ensure effective communication, using multiple platforms such as social media and FM radio to increase transparency and accessibility for local residents. Early engagements to share Project updates involved community consultation call in shows in Kinngait and Kimmirut. These early engagements were followed by regular in-person visits throughout the year.

Community consultation continued throughout the year and was highlighted by a collaborative Government of Canada Federal Tour in March, which brought Baffinland and federal representatives together with communities in Pond Inlet, Kimmirut, Kinngait, Igloolik, Sanirajak, Pond Inlet, Arctic Bay, and Clyde River. Additional consultations and engagement activities included: ETIS sessions and training workshops; Work Readiness Program engagement activities; and support for regulatory processes, including the Type 'A' Water License Hearing, and regional governance meetings that brought together multiple Hunters and Trappers Organizations. CSD and SD teams also took part in community celebrations and major regional events, including the Hamlet of Pond Inlet's 50th anniversary, the Nunavut Quest and Qamutik Cup, Nunavut Mining Week, and participated in national and regional forums such as the Northern Lights Tradeshow, the Arctic Sovereignty and Security Summit, and the Nunavut Sivuniksavut 40th anniversary. Recruitment efforts at Algonquin College supported future capacity, while pre and post shipping meetings with hamlets and partners in Pond Inlet ensured clear communication and coordination around seasonal marine activities. Baffinland also provided country foods for celebrations in Pond and participated in multiple search, rescue and recovery events utilising helicopter resources to support concerned communities.

Summary of Plans for 2026

The 2026 Work Plan was prepared and provided by Baffinland to relevant parties on October 31, 2025 as required under Section 6.1 of the Commercial Lease and under Part J, Item 2 of the Type 'A' Water Licence, for the purposes of an Annual Security Review for activities undertaken on an annual basis.

The 2026 Work Plan described the planned development and operation of the mine, ore crushing and land transportation, stockpiling and marine shipment of ore, and the continued development and construction of infrastructure required at Milne Port, the Tote Road, and the Mine Site. Operation of permitted quarry, borrow and waste retention facilities, and logistical air and sea shipments of equipment, fuel and supplies will continue. Regional exploration programs, ongoing Project environmental monitoring and Tote Road improvements to address safety and fish passage are planned. Limited activities are expected to continue along the Steensby Railway and Steensby Port areas to support final construction planning. These activities are expected to occur within the scope of existing approvals and will be reported, as required, in the annual reporting cycle for the 2026 period.

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ᓯᕗᓕᖅᑎᓂᖅᓱᒪᓕᕆᓂ ᓇᐃᐹᖅᓱᒪᓕᕆᓂ

ᑕᒪᐃᓇ ᐅᓂᒃᑲᖅ ᖃᑭᕐᒋᓂ ᐃᓄᐃᑦ ᑲᑎᒪᔨᖏᑦᑐᖅᓯᓂ (QIA) ᐊᒻᒪᓗ ᓄᓇᕗᒻᒥ ᐃᒪᓕᕆᔨᒃᑯᑦ ᑲᑎᒪᔨᖏᑦᑐᖅᓯᓂ ᓇᐃᒐᓕᑎᓴᓱᒪᓕᕆᖅᓯᖅ ᐱᓕᕆᓂᐅᔪᓕᕆᖅᑐᓂᒃ ᐊᐢᓂᕐᑐᖅ ᖃᐅᔨᓴᖅᖢᓕᕆᖅᑐᖏᓐᓂᖅᓯᒪᓂᖅ ᐱᐊᓂᕐᒋᐅᓕᕆᖅᑐᓄᑦ 2025-ᒥ ᓄᓕᒋᖅᑐᓂ ᐱᓕᕆᐊᖅᒥ (ᐱᓕᕆᐊᖅ) ᐊᑐᖅᓴᓄ ᕿᐢᓀᓪᓂ ᓴᐃᒃᓴᓂᒃ ᐅᓴᖏᖅᓂᐊᖅᑎᑦ ᑯᐊᐳᓴᓴᓪ (ᕿᐢᓀᓪᓂ) ᖃᒃᓄᐃᑦᑐᓂᓪᓗᓂ ‘Δ’ ᐃᒥᖏᓪᓂ ᓕᐃᓴᓐᓯ ᐊᒻᒪᓗ ᓄᓇᒥᒃ ᐊᑐᖅᑐᐊᖏᓂᖅ ᖃᑭᕐᒋᓂᖅᓯᒪᓂᖅ. ᐃᓕᓴᑯᓂ ᐊᖏᔪᒡᒋᓐᓇᖅᑐᑦ ᐅᓂᒃᑲᖅ ᐱᐢᑎᖅᑕᐅᓯᓐᓂᖅᓯᒪᓂᖅ ᐃᓄᐃᑦ ᓄᓕᒋᖅᑐᓂ ᐊᒻᒪᓗ ᓄᓇᕗᒻᒥ ᐃᒪᓕᕆᔨᒃᑯᑦ ᐱᓕᕆᐊᖅᒥ ᖃᑭᕐᒋᓂᖅᓯᒪᓂᖅ ᐊᐢᓂᕐᑐᖅ 2025-ᒥ ᖃᓄᖅᑎᓪᓗᓂ ᐊᒻᒪᓗ ᓄᓇᕗᓚᖅᑎᓪᓗᓂ ᐱᓕᕆᖅᑎᓄᑦ ᐱᐊᓂᕐᒋᐅᓕᕆᓂ ᐊᑐᖅᓴᓄ ᖃᑭᕐᒋᓂᖅᓯᒪᓂᖅ ‘ᐱ’ ᐃᒪᓐᓇᓂ ᕿᐱᓐᓂᕐᒥᒃ ᐊᒻᒪᓗ ᓄᓇᒥᒃ ᐊᑐᖅᑐᐊᖏᓪᓗᓂ.

2025-ᒥ ᕿᐢᓀᓪᓂ ᐅᓄᕐᓂᖅᑎᑎᓵᓪᓕᕆᓂᐅᖅᑐᓂᖅ ᓴᐃᒃᓴᓂᒃ ᐅᓂᒃᑳᖅᑕᕐᓂᖅᓂᒃ ᖃᒃᓄᐃᓐᓂᖅᓴᐅᓂᖅᓯᒪᓂᖅ ᑕᑯᓪᓗᒥ ᐊᖏᔪᒡᒋᓐᓇᖅᑐᓂ ᐊᐅᓚᓂᖅᓂ ᐊᐅᓚᓂᖅᓂ ᐊᑐᖅᑐᐊᖏᓂ ᐊᐅᓚᓂᖅᓂ ᐊᑐᖅᑐᐊᖏᓪᓗᓂ ᐱᓕᕆᐊᖅᒥ ᐃᒪᓕᕆᔨᒃᑯᑦ ᐅᓂᒃᑳᖅᑕᕐᓂᖅᓂᒃ ᐊᐅᓚᓂᖅᓂ ᐊᐅᓚᓂᖅᓂ ᐊᑐᖅᑐᐊᖏᓪᓗᓂ ᐱᓕᕆᐊᖅᒥ ᐃᒪᓕᕆᔨᒃᑯᑦ ᐱᐊᓂᕐᒋᐅᓕᕆᓂ ᐊᑐᖅᓴᓄ ᐊᐢᓂᕐᑐᖅ 2025-ᒥ, ᐊᑐᖅᑐᓂᒃ 4.2 ᒥᓕᐊᓄ ᑕᓐᓂ ᐊᖏᔪᒡᒋᓐᓇᖅᑐ

- ᐊᖏᕆᐅᒪᑎᑕᐅᓂᖅᐸᑦ ᐊᓪᒪᓗ ᑭᖓᔪᖕᕕᑦᑕᐅᓗᑎᒃ ᑕᓯᑦ ᑯᓘᐸᒍᓐᓇᖅᐸᑦ, ᓯᔾᔪᓗ ᑯᓘᕐᓗᓄᑦ, ᓄᓇᖅᑐ ᓄᖓᔪᐸᑦᓯᓕᕐᑕᓗᐊᖏᑦᑐᓄᑦ ᐊᓪᒪᒃ ᐃᓕᓴᕐᕕᑦᑐᓄᑦ ᐊᒪᖅ ᑯᖏᑦᑕᕐᓂᖅᑐ ᐅᔾᔨᖅᓂᐊᖏᖅᓱᓗᒃᑑᒥ;
- ᐃᒪᖅ ᑯᕐᕕᐅᖏᑦᑕᒥᐅᖅᑐᑦ ᐊᓪᒪᓗ ᖃᐅᔨᖏᑦᐸᑦᓯᓕᕐᓂᖅᓯᒪᓕᖅᑕᐅᑦᓗᓂᑦ ᓇᐃᔨᖅᓂᕐᓗᒍ ᐃᒥᖏᑎᒃ ᐱᖓᓱᐊᕐᓂᖅ ᐊᓪᒪᓗ ᐅᔾᔨᖅᓂᐊᖏᖅᓱᓗᒃᑑᒥ ᐃᓕᖅ ᑯᖏᑦᑕᕐᓂᖅᑐᑦ ᐱᓕᕆᔨᒃᑯᑦ ᐃᓐᓇᕐᓂᖅ ᐊᐅᓚᑦᑎᐊᕐᓂᖅ ᐱᖓᓱᐊᕐᓂᖅ;
- ᐱᐊᓂᒃᓯᒪᔪᓇᐅᑦ ᖃᐅᔨᖏᑦᐸᑦᓯᓕᕐᓂᖅᓇᖅᑐᑦ ᐱᓕᕆᓇᖅᑐᑦ ᒪᓕᒃᓴᐅᑦ ᖃᐅᓇᖅᑐᓂᖓ ‘Δ’ ᐃᒥᖏᑦ ᓕᐃᔨᖅᓂᖅᑐᑦ ᐊᓪᒪᓗ ᓴᐃᖏᖅᓂᖅᑐᑦ ᐊᓪᒪᓗ ᐅᔾᔨᖅᑲᓂᖅ ᑎᓯᔪᓂᖅ ᔭᐃᖏᑕᐅᓂᖅᑐᑦ ᐊᐱᑦ ᒪᓕᑐᖅᓂᖅ (MDMER) ᐱᑕᖃᓇᐊᓕᓂᖅᑐᑦ;
- ᐱᐅᓯᐊᓱᖅᓇᖅᑕᓚᑎᓂᖅ ᐊᓪᒪᓗ ᐃᓕᖅᑭᖓᓴᖃᐅᖅᓇᖅᑐᒥᒃ ᐊᐅᓕᑕᐅᓗᑎᒃ ᑕᐃᑲᓂ ᑭᓕᑦᑕ 105 Δᖅᓗ, ᐱᖅᓯᐅᑎᑦᓗᒍ ᓴᓇᓗᑎᒃ ᓯᑕᐅᐃᑲᔪᑎᒥᒃ ᐊᕐᓇᓗᓕᕆᓯᒪᔪᒥᒃ, ᐃᒪᖅ ᑯᓘᐸᐅᖏᑦᑕᕐᕕᑦᑐᓄᑦ ᑎᑭᐅᒪᑦᓕᑦᑕᕐᑎᑦᓗᒍ ᐃᒥᖏᑦ ᕿᐃᖓᔪᖕᓂᖅᑐᑦ ᑭᐱᓕᕐᓂᖅ ᓄᓕᐅᕐᔪᓂᖅ ᓄᑎᑦ ᐊᕐᓇᕐᑕᐅᓯᒪᔪᒥᒃ ᑯᘓᐃᓕᓴᕐᕕᑦᑐᓄᑦ;
- ᐊᐅᓚᑦᑎᐊᕐᓂᖅᑐᑦ ᖃᖏᓚᑕᓯᐅᖏᑦᑕᕐᓂᖅᑐᑦ ᐃᖏᕐᐳᖏᖅᓯᒪᔪᓇᐅᑦ ᐊᐅᓚᑕᐅᓗᑎᒃ ᑕᐃᑲᓂ ᐱᓕᕆᔨᑎᒃ ᐊᐅᓚᑦᑎᐊᕐᓂᖅᑐᑦ ᐃᓕᖅ ᐃᓂᕐᓴᐅᖅᑕᐅᓗᑎᒃ ᐃᖅᑲᓇᐃᔨᖅᑐᑦ ᐱᓕᕆᔨᒃᑯᑦ ᐃᓐᓇᕐᓂᖅ ᐱᓕᕆᔨᒃᑯᑦ ᐃᓕᖅ ᐃᓂᕐᓴᐅᖅᑕᐅᓗᑎᒃ

- ᐱᐊᖏᓰᖅᓯᓂᖅ ᐱᑕᖅᑎᐊᓕᓐᓂ ᖃᐅᔨᓴᖅᖢᑦᑕᐊᖑᕐᓇᖅᑐᓂᔪᑦ ᐱᓕᕆᐊᒃᓴᑦ ᐊᑐᖅᓯᑎᖅ ᐊᑐᖅᑐᓂᖅ ᐊᐅᓚᕋᑎᓂᔪᑦ ᐸᖅᐋᑎᓂᖅ;
- ᓄᓇᕗᕆᓂᖅᓗᑦ ᐊᓕᓚᓐ ᐃᒪᓕᕆᓂᔪᑦ ᖃᐅᔨᓴᖅᖢᑦᑕᐅᓯᒪᔪᓂ ᐃᑲᖅᓴᖅᑕᐅᓯᒪᔪᓂ ᐱᓕᕆᐅᑦ ᐊᓐᓴᐸᑎᖅᑐᑦᑎᐊᖅᑐᓂ ᐱᓕᕆᐅᑦ ᐊᔪᐃᑦᑐᖅᑕᐅᓂᖅ ᐃᓕᓴᕐᓂᐊᕐᓂᖅ

ᓇᖅᓴᓚᓂᓄ ᐊᓱᒪ ᐱᐅᓯᒪᓂᖅᑕᐅᔭᕆᓪᓗᑕᒧᑦ ᖃᐅᔨᓴᖅᓯᕐᓕᐊᖏᓐᓂᔭᕐᓗᒃ ᐱᓕᕆᔨᖏᓇᐅᑦᑐᑦ ᐊᓱᒪ ᓴᓗᓴᖅᓴᐃᔨᖏᓇᐅᑦᑐᑦ, MS-11 ᓇᑕᐅᓕᐅᔭᖅᑐᖅ (ᑐᓂᓴᐅᓯᒪᔨᖅ ᐃᓗᐊᓂ 2024-ᒥ ᐊᖏᕐᕕᒋᓱᑦ ᐅᓂᒃᑲᓂ ᐊᑦᖢᑭᐊᓯᐊᓚᐅᓂᑦ) ᑐᓴᕐᓴᖅᑕᐅᔨᔪᑦ ᓇᑕᑦ ᖃᐅᔨᓴᖅᓯᕐᓕᐊᖏᓐᓂᔭᕐᓗᒃ ᐃᓂᒥᑦ ᑕᐅᓇᖏᑦ ᑭᓪᓗᒍ 105-ᒥ ᓇᖅᓴᒥ ᐃᒪᖏᑦ ᐊᐅᓕᕆᐊᖓᖏᒥ. ᖃᐅᖅᑲᓂᕐᔪᐊᑦ, ᓴᓇᐅᒪᓂᕆᓴᒍ ᓯᓚ ᐱᖓᓕᕐᓕᐊᖏᑐᓇᖅᑐᑦ ᓯᖓᓂᕆᓴᒥ ᐃᒪᓕᕐᓵᐊᑎᓄᑦ ᐃᓗᐊᓂ ᐱᓕᕐᓴᖓᓕᕐᓂ. 2025-ᒥ, ᐱᖓᓱᓄᖓᓂᑦ ᓯᑭᐃᔨᐃᓵᑦ ᐊᖓᓗᐃᑦ ᓴᓇᔨᐅᓕᐅᖅᑐᑦ ᐊᒥᓗᐃᑦ ᐊᖓᓗᓕᕐᑕᐅᓕᖅᑐᓄᖅ ᑎᓴᓄᖅᑕᐅᓯᒪᔪᓂ ᓯᖓᓕᕐᐅᔨᖅᔨᓄᐅᔪᓂ ᐃᓂᓂ ᐊᓱᒪ ᑕᓯᓂ. ᐸᖅᓇᐃᓂᖅ ᐊᓱᒪ ᓴᓇᐅᒪᓂᖅᓴᖓᓂᑦ SDLT-1 ᒪᓕᓐᓇᑐᐃᓇᓂᐊᖅᑐᑦ ᓯᖓᓂᖅᑭᒃ ᐃᓕᐱᑭᑐᔪᐊᓂ ᐱᔪᒋᑎᔪᐊᓂ ᓴᓇᐅᒪᓂᖅᓴᑎᓄᑦ ᐊᓱᒪ ᐃᓱᓕᕐᓂᖅᓯᒪᑦ.

ᔮᕐᓇᓂᑦ

2025-ᒥ, ᖃᔨᓕᑦ ᔮᕐᓇᓂᑦ ᐅᖃᐅᔨᓕᕐᑕᖅᑐᑦ ᓇᓇᕐᑎᐊᖅ–ᓇᓇᕐᓂᑦ (NT-NU) ᔮᕐᓇᔪᖃᕐᓂ ᐅᖅᑲᓕᕐᓴᓗᑦ. ᖃᐅᖅᑲᓂᕐᔪᐊᑦ ᔮᕐᓇᓴᓕᓕᐅᖅᑐᓄᑦ ᐅᓂᒃᑲᓂ ᑐᓂᓴᐅᓯᓂ ᐃᓗᐊᓂ 24 ᐃᑲᖅᑎᑦ ᐊᑐᓂ ᔮᕐᓇᔪᖃᖅᑎᑦᓗᒍ 2025-, ᓇᓗᓇᐃᔪᖅᓯᒪᔪᓂ ᖃᐅᔨᐱᐅᐊᖅᑲᓂᕐᓂᖓᓪᓗᑦ ᐅᓂᒃᑲᓂ ᑐᓂᓴᐅᓕᕐᑕᖅᑐᑦ ᐃᓗᐊᓂ 30 ᐃᓕᓗᐃᑦ ᐊᑐᓂ ᔮᕐᓇᔪᖅ ᐅᖅᑲᓯᓕᕐᓕᐊᖅᑎᑦᓗᒍ. ᐸᓴᓐᓀᓂᔭᕐᓂ ᖃᐅᔨᓴᓕᕐᑕᖅᑐᑦ ᐱᔭᕆᐊᓕᖅᑐᓂ ᔮᕐᓇᓗᓀᑦᑎᓂᓄ ᐊᑕᖏᓐᓂᔭᖅ ᐊᑕᖏᓐᓂᔭᕐᓂᓄ ᔮᕐᓇᓂᑦ ᐅᔾᔨᖓᓂᐊᖓᔪᖓ 2025-ᒥ ᐊᑐᑎᖃᕐᑎᐊᖅᑐᒥᓄ ᐊᔪᓂᐅᓕᕐᓂᖅ ᐊᖏᕐᕕᒋᐊᕐᑎᓄᑦ ᐱᓕᕐᓂᖅᑕᐅᓯᒪᓂᖅ ᐱᓕᕐᓂᖅᑕᐅᓯᒪᓂᖅ ᑕᐃᒪᓕᐅᑎᓕᑎᓕᕐᑕᐅᓕᖅᑐᓂᑦ ᐊᐳᔾᔨᓗᓐᓂᕐᓂᓄᑦ ᖃᐅᔨᓴᓂᐊᖓᔪᖓᓄᑦ ᓯᖓᓂᖅᑭᒃ. ᖃᔨᓕᑦ (10) ᔮᕐᓇᓂᑦ ᐅᖃᐅᔨᓕᕐᓂᑦ ᓇᓇᕐᑎᐊᖅ–ᓇᓇᕐᓂᑦ (NT-NU) ᔮᕐᓇᔪᖃᕐᓂ ᐅᖅᑲᓕᕐᓴᓗᑦ 7-ᖁᓪᓗᑦ (70%) ᓇᔭᕐᓄᓂ ᐅᔾᔨᖓᓂᐊᖓᔪᒋᓕᕐᑕᖅᑐᑦ, ᐊᓱᒪ ᒪᖃᕐᒥ (20%) ᕿᖏᐃᐊᓂ ᑐᓴᕐᑕᖓᖏᒥ, ᐊᑕᐅᓯᓗ (10%) ᐅᓯᑲᖅᑕᕆᓂᑦ ᐊᖅᑯᒋᓂ. ᐊᑯᓕᐅᑕᕐᓂᖓᖅ ᐅᖅᑲᐅᓯᐅᔾᔨᐊᖓᓕᕐᓂᓄ ᑯᓚᓕᓂᑦ 2025-ᒥ ᐃᒪᐃᓕᖓᖅᓯᒪᓕᕐᑕᖅᑐᑦ; ᐃᓯᓂᑐᖅᑐᑐᒥ ᐃᓕᓂ (3), ᓴᓇᓚᖅᓴᓯᒪᖏᑕᑐᖅ ᕿᓇᓗᖅᑲᖅᓚᖅ (3), ᐃᓕᓂ (ᓴᓇᓚᖅᓴᖅᓴᓯᒪᔪᖅ ᐅᕙᓪᓕᓇᓂᓂᑦ ᓴᓇᓚᖅᓴᖅᓴᓯᒪᖏᑕᑐᖅ) (2), ᐃᓚᖏᑦᑐᖅᐃᓂᑦ ᕿᓂᖅᑐᖅ (1), ᐊᓚᒪ ᐅᕈᐅᖅᑕᖅᑐᒥᓯᐅᑎ ᕈᐊᐸᖅᐅᑎᓯᐅᑎ ᐅᖅᓯᐊᓗᓀᖅ (1).

ᐃᓚᖏᑲᒃ ᐊᑐᖏᓂᖅ ᐃᓚᕆᐊᕐᓂᒥᓗ ᖃᐅᔨᓴᖅᓯᕐᓕᐊᖓᓪᓂᖅ

ᐊᑐᖅᓗᒍ ᐱᔪᓐᓇᐅᑎᑦ ᖃᐅᓇᐃᑦᑐᓂᖓᓚᓄᑦ ‘ᐃ’ ᐃᒥᖏᒥ ᓇᐃᓴᓐᓂᓯ, ᐃᓚᕆᐊᕐᓂᒥ ᐃᓚᐃᔨᐃᔪᖅᑐᓕᕐᑕᖅᑐᑦ 2025-ᒥ ᐱᖓᓱᓂᑦ (3) ᐱᔪᓐᖅᑐᖅᓗᑕᖓᔪᖅᑐᓄᑦ ᐱᓕᕆᐊᒥ: ᐃᓚᖅᑎᓂᖅ (ᓇᔪᓚᖏᑦ), ᐳᔪᖏᖅᑐᓗᑕᖓᔾᔨᐃᓕᓂᒪᑎ, ᐊᓯᖏᓐᓂᓗ ᐊᓇᕐᓂᖓᒥ ᐱᔪᓐᓇᕐᔪᓯ. ᐅᖓᑖᓕᐅᔭᓯᒪᓂᖅᑕᖏᖅᑐᖓᓕᑦ ᖃᐅᔨᓴᕆᒪᓕᕐᑕᖅᑐᑦ ᐊᓯᐅᓕᕐᓂᑦᑎᓂᓄ ᐃᓕᓴᕐᓂᖅ ᐃᓚᖏᑦ 2025-ᒥ. ᐱᓕᕆᖏᖅᑐᑦ ᐃᓚᐃᔨᐃᓂᖓᓚᐅᑦ ᐅᖓᑖᓕᐅᔭᓯᒪᓂᖅᑐᑦ ᖃᐅᔨᓴᕆᒪᓕᕐᑕᖅᑐᑦ ᐃᓚᐃᔨᐃᓂᖓᓚᐅᑦ ᐳᔪᖏᖅᑐᓗᑕᖓᔾᔨᐃᓕᓂᒪᑎᓄᑦ 2025-ᒥ. ᐅᓄᕐᓂᔾᔪᑎᑦᓯᓪᓗᐊᖅᓯᒪᔪᓂ ᐅᖓᑖᓕᐅᔭᓯᒪᓂᖅᑕᖅᑐᑦ ᑎᑎᕋᖅᑕᐅᓯᒪᔪᓂ 2022-ᒥ 2024-ᒧᑦ. ᑕᒪᓐᓇ ᐱᓗᐊᕐᓂᔾᔪᓯᒪᓂᖅ ᐊᑐᑎᖃᖅᓯᓕᕐᓂᖅ ᓴᖅᑭᖅᑎᑕᐅᓯᒪᔪᓂᖓᓂᕐᓂᓄ ᐱᓕᕆᔨᓴᓂᓄ ᐊᐅᓕᕆᐊᖓᓂᖅ, ᐱᖃᓯᐅᑎᓪᓗᑦ ᐃᖅᑲᐅᑎᓪᓗᑦ-ᑐᖅᑲᒪᓕᓪᓗᑦ (ᐅᓪᓗᖅᓯᐅᑎᑦ ᐅᓄᓇᐊᖅᓯᐅᑎᑦ) ᖃᐅᔨᓴᒪᓇᓕᓴᓂᖏᓪᓗᑦ ᖃᐅᔨᓴᖅᓯᕐᓕᐊᖓᓪᓂᖅ ᐃᓚᖏᑦ ᐊᑐᖅᑐᑦ ᐊᑐᓂ ᐊᖏᕐᕕᒋᓱᑦ ᐃᓚᖏᑦ ᐊᓯᐅᓕᕐᓂᑦᑎᓂᓄ ᐃᓚᐃᔨᐃᓂᖓᓚᐅᑦ ᐊᑐᖅᑐᑦ ᐊᑐᓂ ᐊᖏᕐᕕᒋᓱᑦ ᐃᓚᖏ

ᓄᖕᕿᐊᓄᓱᖏᓚᖅ ᐊᖏᔪᖓᒪᓪᓗ ᐃᖅᑭᖏᖅᐃᓐᓇᖅᑎᑕᐅᓪᓚᑦᑐᓂᓗ. ᐊᓂᒍᓐᓇᖅᑐᓂ ᖃᑎᖏᑕᐃᓐᓇᖅᑐᑦᓯᖅᑐᑦ ᐊᑐᓕᖅᑎᖏᑎᒍᖏᓪᓗᑎᑦ ᐱᓕᕆᔨᓂᖓ ᐃᓚᖃᖅᖁᐅᔪᓕᒃ.

ᖃᐅᖅᓂᖅᓯᐊᒍᑦ ᑕᔪᓄᖕᓚ ᖃᐅᐅᓴᖏᓱᑎᓄᑦ ᑐᓴᐅᒪᖃᖅᑕᐅᑎᔨᐸᑎᓄᑦ ᖃᐅᐅᓴᖅᓯᓕᕆᖅᑭᓇᖅᓄᑦ (SNP), ᐊᓱᖅᑕᑦ ᐊᒋᑎᒥᐅ ᖃᐅᐅᓴᖅᓯᓕᕆᖅᑭᓇᖅᓯᓂᒍᑦ ᐱᓕᕆᐊᑦ ᐱᓴᓰᖅᑕᐅᓕᐅᕐᖅᑐᑦ 2025-ᒥ. ᑕᐅᔪᐊ ᐱᖃᓱᐅᓴᔨᔪᑦ ᐃᒪᒐᒍᓂᓄᑦ ᖃᐅᐅᓴᖅᓯᓕᕆᖅᑭᓇᖅᓯᓂᒍᑦ ᐱᓕᕆᐊᓂᐅ (AEMP) ᐊᓪᓚᓗ ᐅᓱᐅᖅᑕᖅᑲᑦᑕ ᐊᖅᑯᔪᑕᓂᐅᓂᖅ ᖃᐅᐅᓴᖅᓯᓕᕆᖅᑭᓇᖅᓯᓂᒍᑦ ᐱᓕᕆᐊᖅᓂ (TRMP), ᓄᓇᐅᑦ ᐊᒋᑎᓴᓂᐅ ᐸᓕᐅᒪᑎᑕᑎᓇᓱᑲᑦᑕ ᐊᓪᓚᓗ ᖃᐅᐅᓴᖅᓯᓕᕆᖅᑭᓇᖅᓯᓂᒍᑦ ᐸᖃᓇᐅᑲᑦᑕ (TEMMP), ᐊᓂᖏᖅᓯᐅᑕᑕ ᖃᓄᐃᔾᔨᓂᖓᓴᓕ ᐊᓪᓚᓗ ᓂᐱᖅᑐᐃᓐᓇᖅᑕᐃᓕᓕᒪᓂᒍᑦ ᖃᐅᐅᓴᖅᓯᓕᕆᖅᑭᓇᖅᓯᓂᓄᑦ ᐸᖃᓇᐅᑲᑦᑕ (AQNAMP), ᐊᓪᓚᓗ ᑕᓇᐅᑦ ᐊᒋᑎᓴᓄᑦ ᐊᖅᑐᐃᓐᓇᖅᑕᐃᓕᓕᒪᓂᒍᑦ ᖃᐅᐅᓴᖅᓯᓕᕆᖅᑭᓇᖅᓯᓂᒍᑦ ᐱᓕᕆᐊᖅᓂ (MEEMP). ᑕᓚᖅᑯᐊᑦ ᐱᓕᕆᐊᑦ ᑲᔪᓯᓚᐅᖅᑐᑦ ᐊᖏᔪᖅᑕᐅᓂᓯᓚᑎᓪᓗᑎᑦ ᒪᓕᖅᑕᐅᓕᓚᑎᓪᓗᑎᑦ ᐅᓴᖏᓐᓂᐊᑭᓐᓂᑦ ᒪᓕᖅᑕᐅᓕᓚᑎᓪᓗᑎᑦ.

ᓄᓇᓕᖕᓂᓄᑦ ᑐᓴᖏᓱᐊᖏᓂᑦ ᐊᓚᒪ ᑲᑎᒪᖏᓐᖓᖏᖅᑲᖏᖅᑕᖏᓂᑦ

2025-ᒥ, ᐊᓂᒍᓐᓇᖅᑐᑦ ᓄᓇᓕᖕᓂᓂᑦ ᖃᐅᔨᖅᑐᑦᑕᐅᓱᒪᔨᓂᑲᓗ ᐱᓕᕆᓕᖅᑎᑦᑎᓂᖅᓯᖏᓪᓗᑎᑦ (CSD) ᐊᓚᒪᓗ ᑲᔪᓯᓄᕆᓄᖅᑐᓂᒍᑦ ᐱᓕᕆᓕᖅᑎᑦᑎᓂᖅᓯᖏᓪᓗᑎᑦ (SD) ᐱᓕᕆᓴᖅᑲᑦᑕ ᑲᑎᒪᖏᓐᖓᖏᖅᑲᖏᖅᑕᐃᓕᓕᒪᓂᒍᑦ ᓄᓇᓕᖕᓂᖅ ᐊᖅᑐᑦᑐᓂᒍᑦᑲᓐᓂᖅᓴᐅᓂᖅ ᐃᓅᓴᖃᖅᑐᓂᓗ ᐱᓕᕆᐊᖅᓂ, ᐱᖅᑭᓯᐅᑎᓪᓚᒍ ᐃᓕᐱᒋᑦᓯᔨᐊᓕᕆᓚᖅᖁᖅ. ᑲᒪᔨᖅᑎᑦᔨᖅᖁ ᓀᐊᑎᓪᓚᑐᓂᒃ ᐊᓚᒪ ᖃᓴᓇᐅᔾᔪᖅᑐᓂᒍᑦ ᑲᑎᒪᖏᓐᖓᖏᖅᑲᖏᖅᑕᐃᓕᓕᒪᓂᒍᑦ, ᓯᕐᓕᓕᐅᔾᔨᐅᓕᓕᒪᓂᒍᑦ ᑲᑎᒪᖏᓐᖓᖏᖅᑲᖏᖅᑕᐃᓕᓕᒪᓂᓄᑦ ᐃᖅᑲᓇᐃᔾᔨᖅᑐᓂᒍᑦ, ᐊᔾᔨᖏᓐᓂᑦᑎᓂᒃ ᑲᑎᒪᖏᓐᖓᖏᖅᑲᖏᖅᑕᐃᓕᓕᒪᓂᒍᑦ ᐃᓅᓴᖃᖅᑐᓂᓗ ᐊᓚᒪ ᓀᓕᐅᑎᖏᓐᖓᖏᖅᓴᖅᑎᒍᑦ ᐊᔾᔨᑎᖏᓐᓂᑦᑎᓂᖅᓯᖏᓪᓗᑎᑦ ᐃᓕᓴᕐᓂᖅᑎᑦᑎᓂᖅᓯᖏᓪᓗᑎᑦ ᐃᓕᓴᕐᓂᖅᑐᓂᒍᑦ ᐊᓚᒪ ᓄᓇᓕᖕᓂᓂᑦ ᐊᓚᒪ ᓄᓇᓕᖕᓂᓂᑦ ᐃᓅᓴᖃᖅᑐᓂᒍᑦ ᐱᓕᕆᐊᖅᓂ

ᐊᒥᓱᒪᓪᓕᐅᒃ ᐱᖅᑭᓇᖅᑐᓪᓚᕆᓂᖅᓂ, ᐸᖅᓇᐃᓂᖅᓂ ᐊᒻᒪ ᖃᓂᖅᑎᑦᓯᑎᑦ ᐊᑐᖅᑕᐅᑦᓯᑎᑦ ᖃᐅᔨᒧᐅᖅ ᐃᓕᓴᕐᓂᑦ ᐃᓕᓴᕐᓂᖅᓯᐅᑦᓯᑎᑦ ᐃᓱᒪᓕᓯᖅᑐᑦ ᓄᓇᓕᒻᒥᐅᖅ.

ᓇᐃᔭᖅᓱᒪᔪᑦ ᐸᖅᓇᐅᑎᑦ 2026-ᒧᑦ

2026-ᒥ ᐱᓕᕆᐊᖓᓂᐊᖅᑐᖅ ᐸᖅᓇᖅᑕᐅᓕᐅᖅᑐᑦ ᐱᙵᑎᓴᖅᑐᑎᓗ ᐸᙵᓇᓐᙵᖅᓯᓗ ᑎᒥᐅᔨᓄᑦ ᐅᑐᐊᖓ 31, 2025-ᒥ ᑕᐃᒪᐃᑦᑕᕆᐊᖅᑎᓂᖅᐳᓄᑦ ᑕᐃᑯᓇ ᐊᐃᖅᑐᖅᓱᒪᔪᖅᑯᑦ 6.1 ᓄᓇᒥᒃ ᐊᑐᖅᑐᐊᖅᓂᖓᓕᒫᑦ ᐊᒻᒪᓗ ᐃᓕᓴᒃ ᓕ ᐃᓗᓕᖅᑐᒃ 2 ᖃᓄᓇᐃᑐᑐᖅᑐᒃ ‘Δ’ ᐃᒪᖓᒧᑦ ᓕᐃᔪᓴᓂᖅᐳᑎᑦ. ᐱᔪᑎᑎᑦᓗᓂᐅᒃ ᐊᖅᑭᒧᑕᒪᔭᖅᓱᒪᔨᑎᑦ ᐊᑦᑕᓇᖅᑐᒥᑎᑕᐃᓕᓂᖅᓯᒪᒧᑦ ᖃᑎᒌᖅᓂᒋᐊᖅᑐᑦ ᐊᖅᑭᒧᑕᒪᔭᖅᑐᑦ.

2026-ᒥ ᐱᓕᕆᐊᖓᓂᐊᖅᑐᖅ ᐸᖅᓇᖅᑕᐅᓕᐅᖅᑐᑦ ᓇᓗᓇᐃᔪᐃᓱᒪᔪᑦ ᐸᖅᓇᖅᑕᐅᓱᒪᔪᓂᖅ ᐱᔪᑦᓕᐊᑎᑕᐅᓂᖅᓯᒪᓂᖅ ᐊᐅᓪᓕᑕᐅᓂᖅᓯᒪᓂᓗ ᐅᔪᕐᓂᖅᓯᐊᖅᓴᖅ, ᓴᐃᖅᓴᓂᖅ ᓱᖅᑲᓕᑎᓂᖅᑐ ᐊᒻᒪ ᓄᓇᖅᑐᐃᓂᖅ ᐅᓱᖅᑭᖅᕿᓂᖅ, ᑲᑎᖅᑎᓂᖅ ᐊᒻᒪ ᐅᔪᕐᓂᖅᓯᐊᖅᓴᖅ, ᐱᙵᓕᓕᑎᑕᐅᖅᓯᒪᓂᖅᓯᓗᓂᓗ ᐱᓇᐅᔨᓂᖅᓴᖅᓕᓂᓗ ᐱᕐᔪᑎᕐᐊᑦ ᐱᑕᖅᑲᐊᓂᖅ ᖃᖏᕐᐊᓂ ᑐᓪᓕᖅᑕᖅᑎᒥ, ᐅᓱᖅᑕᖅᑕᖅᑎᑦ ᐊᖅᑯᑦᓂᓂ, ᐊᒻᒪ ᐅᔪᕐᓂᖅᓯᐊᖅᑎᖓᒥ. ᐊᐅᓪᓕᑕᐅᓂᖅᓯᒪᓂᖅ ᐱᔪᒪᓂᐅᑎᖅᑐᑦ ᑐᐊᐸᖅᑕᖅᑲᑦ. ᐃᑎᖅᓴᓪᓕᐅᖅᑲᑦ ᐊᒻᒪ ᐊᑐᖅᑕᐅᓴᖏᓐᓂᑕᓄᑦ ᐱᓪᓕᖏᑲ, ᐊᑦᖃᐳᓴᖅᓱᒪᔪᓴᓪᓕᐊᓂᓂ ᖃᖓᓐᓂᑕᓱᓂᖅᑐᑦ ᐊᒻᒪ ᑕᕆᐅᖅᑐᑦ ᑎᐹᑎᑕᐅᖅᖃᑕᖅᑕᓂᖅᓯᒪᓂ ᐱᕐᔪᑎᑦ, ᐅᖅᓱᐊᓗᐃᑦ ᐊᒻᒪ ᓱᓇᖅᑐᑦ ᑲᔪᓯᐊᖅᑐᑦ. ᓄᓇᓕ ᐊᐃᖅᑐᖅᓱᒪᔪᓄᑦ ᖃᐅᔨᓴᖅᑐᑦ ᐱᓪᓕᐊᑦ, ᐱᓪᓕᐊᒥ ᐊᖏᑎᒥᐅ ᖃᐅᔨᓴᖅᐸᑦᓕᐊᖓᓇᓂᖅᓯᓂ ᐊᒻᒪ ᐅᓱᖅᑕᖅᑐᑦ ᐊᖅᑯᑦᓂᓂ ᐱᐅᓱᖅᑕᐅᐸᑦ ᖃᐅᔨᓴᖅᑐᑦ ᐊᒻᒪ ᐃᖅᑲᓗᐃᑦ ᐃᑲᖃᐃᖓᓂᖅ ᐸᖅᓇᖅᑕᐅᓱᒪᔭᑦ. ᑭᓪᓕᖅᖃᖅᑐᑦ ᐱᓪᓕᓂᑦ ᓂᓪᐅᑎᓪᓗᐊᑦ ᑲᔪᓯᐊᖅᓂᖓᓂᓐᓂᑲ ᑕᐅᑭᓇ ᐃᖅᐱᑎᑐᑦᓯᐊᓂᑦ ᓄᓇᓱᐅᑎᔨᑦᑕᐅᓂᖅᓯᒪᓂᖅ ᐊᒻᒪ ᐃᖅᐱᑎᑐᑦᓯᐊᓂᖅ ᑕᐃᒪᐃᓐᓇᖅᑐᑦ ᐊᒻᒪ ᐃᖅᐱᑎᑐᑦᓯᐊᓂᖅ ᑐᖓᔪᓕᓂᖅᐸᓇᖅᑐᑦ ᐊᖅᑯᑦᓂᓂ ᐸᖅᓇᖅᑕᐅᓱᒪᔪᑦ. ᑕᒪᑦᑯᐊ ᐱᓕᕆᓂᑦ ᓂᓪᐅᑎᓪᓗᐊᑦ ᐊᑐᖅᑕᐅᓂᖅᓯᒪᓂᖅ ᐃᓗᓐᓂᑦ ᑐᓴᐅᒪᔪᑦ ᐊᖅᑯᑦᓂᓂ ᐊᒻᒪ ᓂᓪᐅᑎᓪᓗᐊᑦ ᐃᓗᓐᓂᑦ ᐱᓕᕆᓂᑦ ᓄᓇᓱᐅᑎᔨᑦᑕᐅᓂᖅᓯᒪᓂᖅ, ᐊᑐᖅᑕᐅᓱᒪᔪᓄᑦ ᐊᒻᒪ ᐊᑐᖅᑕᐅᓱᒪᔪᓄᑦ ᐱᓕᕆᓂᑦ ᐱᔪᑦᓕᐊᑎᑕᐅᓂᖅᓯᒪᓂᖅ ᐊᒻᒪ ᐃᖅᑲᓗᐃᑦ ᐃᑲᖃᐃᖓᓂᖅ ᐸᖅᓇᖅᑕᐅᓱᒪᔭᑦ. ᐱᓱᒪᓕᓯᖅᑐᑦ ᐊᒻᒪ ᐃᖅᑲᓗᐃᑦ ᐃᑲᖃᐃᖓᓂᖅ ᐸᖅᓇᖅᑕᐅᓱᒪᔭ

ASSOCIATION INUIT DE QIKIQTANI (QIA) ET OFFICE DES EAUX DU NUNAVUT (NWB) RAPPORT ANNUEL 2025 SUR LES OPÉRATIONS

RÉSUMÉ EXÉCUTIF

Le présent rapport, soumis à l'Association inuit de Qikiqtani (QIA) et à l'Office des eaux du Nunavut (NWB), résume les activités et la surveillance environnementale réalisées en 2025 dans le cadre du projet Mary River (le « Projet »), en vertu du permis d'utilisation des eaux de type « A » de Baffinland Iron Mines Corporation (« Baffinland ») et du bail commercial avec QIA. Un rapport annuel distinct a également été préparé pour QIA et NWB, résumant les activités d'exploration et les travaux géotechniques réalisés en 2025 en vertu du permis d'utilisation des eaux de type « B » et du bail commercial de Baffinland.

En 2025, Baffinland a réduit le transport de minerai par rapport aux années précédentes, dans le cadre des approbations de la proposition d'augmentation de la production et de la proposition de maintien des opérations. En 2025, Baffinland est revenu aux limites de transport de la phase de revenus initiale (ERP), soit 4,2 Mt/an. Les activités d'extraction et de transport entre le site minier et le port de Milne se sont poursuivies tout au long de 2025, avec 4,2 Mt de minerai de fer transportées via la route Tote et stockées au port de Milne. Les activités de transport nécessaires pour transporter les volumes indiqués sont demeurées conformes à celles présentées et évaluées dans l'addenda de l'étude d'impact finale (FEIS) de la phase de revenus initiale.

Les opérations minières et le développement des infrastructures du Projet se sont poursuivis en 2025. Le Projet a complété le processus d'audience publique pour le renouvellement du permis d'utilisation des eaux de type A en mars et s'est vu délivrer le permis 2AM-MRY2540 le 9 juin 2026. Les principales activités réalisées en vertu du permis d'utilisation des eaux de type « A » et du bail commercial sont décrites ci-dessous par zone du Projet.

Site minier

Au site minier, les principales activités du Projet comprenaient:

- L'exploitation du gisement n° 1, le concassage et l'entreposage du minerai au site d'entreposage KM 106 et à l'emplacement du broyeur du site minier;
- Le dépôt de déchets inertes non dangereux au site d'enfouissement de déchets non dangereux du site minier (site d'enfouissement);
- Le dépôt de stériles provenant des opérations du Projet au site de stockage des stériles, tout en poursuivant l'exploitation et la surveillance de l'étang du site de stockage des stériles (MS-08) afin de s'assurer que les eaux rejetées respectent les critères applicables;
- Le placement de matériaux de construction de type non-générateurs d'acide pour la construction d'une aire d'entreposage au site minier adjacente aux activités de concassage où les granulats sont produits;
- L'entretien et le remplacement des systèmes de drainage des eaux de surface, tels que les ponceaux, afin de réduire l'érosion et la sédimentation potentielles et d'améliorer le drainage de l'eau sur le site;
- L'eau rejetée et surveillée à partir des infrastructures de gestion de l'eau autorisées;

- Les programmes de surveillance requis réalisés conformément au permis d'utilisation des eaux de type « A » et aux exigences du Règlement sur les effluents des mines de métaux et des mines de diamants;
- La poursuite des améliorations et de la gestion adaptative à l'installation KM 105, y compris la construction d'une berme filtrante, afin de garantir que les eaux rejetées au nouveau point de rejet approuvé respectent les limites du permis;
- La logistique aérienne pour l'approvisionnement du Projet en personnel et en fournitures;
- L'utilisation et le suivi de l'eau pour des usages domestiques et industriels à partir de sources approuvées;
- Le potentiel d'érosion et de sédimentation évalué sur l'ensemble du site et les mesures préventives et correctives appropriées mises en œuvre; et
- L'application de mesures de suppression des poussières à l'emplacement du concassage afin de réduire la poussière pendant le chargement et le transport du minerai.

Route Tote

Le long de la route Tote, les principales activités du Projet comprenaient:

- Le transport du minerai du site minier vers le port de Milne pour entreposage à l'aide de camions de transport
- Le transport de carburant et autres équipements du port de Milne vers le site minier pour soutenir les opérations et le développement;
- Des travaux d'entretien, réalisés en dehors du lit des cours d'eau, complétés sur la route Tote et les infrastructures associées afin de maintenir la surface de roulement et la stabilité, d'améliorer le drainage de l'eau et de réduire les enjeux liés à la sécurité et le maintien des opérations;
- Des mesures préventives et correctives mises en œuvre pour atténuer les problèmes potentiels de sédimentation et d'érosion, y compris, sans s'y limiter, l'enrochement et la modification des pentes des talus, l'installation de seuils et de clôtures à sédiments, ainsi que le déneigement et le déglaçage des structures sensibles au transport de l'eau;
- La remise en état des sites prioritaires d'emprunt historiques s'est poursuivie;
- Le développement de la source d'emprunt du km 97 s'est poursuivi afin de fournir des matériaux pour le Projet;
- La suppression des poussières à l'aide de chlorure de calcium et d'eau en provenance de sources approuvées réalisée régulièrement sur les routes du Projet; Les programmes de surveillance requis réalisés conformément aux plans de gestion applicables;
- Des études géotechniques et hydrologiques réalisées sur certains croisements de cours d'eau; et
- Les travaux de reconstruction de divers ponceaux pour le passage des poissons le long de la route Tote.

Port de Milne

Au port de Milne, les principales activités du Projet comprenaient:

- La poursuite de l'entreposage du minerai à l'installation d'entreposage du minerai du port de Milne avant et après la saison de navigation 2025;
- L'envoi du minerai vers les marchés internationaux au moyen du chargeur de navires au port de Milne et de navires de transport de minerai;
- L'application de mesures de suppression des poussières sur les piles de minerai du port de Milne;
- Les eaux usées surveillées à partir des infrastructures autorisées de gestion de l'eau avant rejet;
- Les programmes de surveillance requis réalisés conformément au permis d'utilisation des eaux de type « A »;
- L'utilisation et le suivi de l'eau pour des usages domestiques et industriels à partir de sources approuvées;
- L'utilisation de matériaux dynamités provenant de la carrière Q1;
- Plusieurs opérations de ravitaillement maritime, y compris des expéditions depuis le Projet vers le sud du Canada et la livraison de carburant, d'équipement et de fournitures pour soutenir les opérations et le développement du Projet; et
- Le potentiel d'érosion et de sédimentation évalué sur l'ensemble du site et les mesures préventives et correctives appropriées mises en œuvre.

Modifications importantes des infrastructures du Projet

Aucune nouvelle structure importante associée à des modifications approuvées n'a été mise en œuvre en 2025. Les travaux associés aux modifications approuvées réalisés dans le cadre du Projet en 2025 comprenaient :

- Modification n° 11 – Installation d'un incinérateur au camp de 380 personnes du port de Milne.

En raison des résultats des essais initiaux et du suivi des émissions à la cheminée, Baffinland n'a pas mis en service l'incinérateur au camp de 380 personnes et, en 2025, l'unité a été démontée et mise hors service.

- Modification n° 13 – Infrastructures de gestion de l'eau du site minier (NWB, 2021).

Baffinland a mis en œuvre une nouvelle stratégie pour le traitement des eaux à l'installation KM 105 et a construit de nouvelles infrastructures à la suite de la réponse de gestion adaptative résumée dans le rapport de fin d'année du KM 105. Afin de soutenir les nouvelles infrastructures de gestion de l'eau dans la vallée KM 105 ainsi que l'amélioration des capacités de surveillance et de traitement, la station MS-11 a été déplacée (tel que soumis dans la demande de modification du rapport annuel 2024) vers un nouvel emplacement de surveillance proposé en aval des infrastructures de gestion de l'eau de la vallée KM 105. De plus, des travaux d'ingénierie se sont poursuivis pour les futures infrastructures de gestion de l'eau au sein de l'installation. En 2025, trois (3) bermes filtrantes supplémentaires ont été construites et un enrochement a été mis en place dans des zones et plans d'eau prioritaires désignés. La planification et l'ingénierie pour le Tributaire n° 1 du Lac Sheardown se poursuivront en parallèle avec les futurs travaux d'ingénierie et de construction des infrastructures de Steensby.

Déversements

En 2025, dix déversements ont été signalés sur la ligne de signalement des déversements des Territoires du Nord-Ouest–Nunavut (NT-NU). En plus du rapport initial soumis dans les 24 heures suivant chaque événement de déversement en 2025, un rapport de suivi détaillé a été soumis dans les trente (30) jours suivant chaque déversement signalé. Baffinland a enquêté sur les causes de tous les déversements survenus sur le site en 2025 afin de mettre en place des mesures correctives efficaces à long terme pour prévenir des incidents similaires. Sur les dix (10) déversements signalés sur la ligne NT-NU, sept (70 %) se sont produits au site de Mary River, deux (20 %) au port de Milne et un (10 %) le long de la route Tote. La fréquence des déversements déclarables en 2025 était la suivante : eau chargée de sédiments (3), eaux usées non traitées (3), eau (traitée ou brute) (2), huile hydraulique (1) et carburant diesel (1).

Utilisation de l'eau et surveillance de l'eau douce

En vertu de l'autorisation du permis d'utilisation des eaux de type « A », de l'eau douce a été prélevée en 2025 pour trois (3) principales utilisations dans le cadre du Projet : l'approvisionnement en eau potable (usage domestique), la suppression des poussières et d'autres usages industriels. Aucun dépassement des limites quotidiennes de prélèvement pour les usages domestiques et industriels n'a été constaté en 2025. Aucun dépassement des limites quotidiennes de prélèvement d'eau destinée à la suppression des poussières n'a été enregistré en 2025. Il s'agit d'une diminution significative par rapport aux dépassements historiques observés entre 2022 et 2024. Cette réduction est attribuable au renforcement des contrôles procéduraux, notamment au suivi par quart de travail (jour et nuit) de l'utilisation quotidienne de l'eau à chaque point de prélèvement autorisé par rapport aux limites quotidiennes applicables.

Durant l'année 2025, Baffinland a effectué une surveillance requise dans le cadre du Programme du réseau de surveillance (SNP), tel qu'énoncé à l'annexe I du permis d'utilisation des eaux de type « A », en analysant les effluents rejetés dans l'environnement et en surveillant la qualité des eaux de surface conformément aux stations de surveillance autorisées. Les installations de rétention d'eau ont été évaluées avant rejet afin de vérifier, dans la mesure du possible, leur conformité aux critères du permis applicables. Un (1) dépassement des critères du permis d'eau a été signalé en 2025 : les matières en suspension totales (MES) étaient légèrement supérieures aux critères du permis dans un échantillon prélevé à l'installation KM 105 (MS-11), qui fonctionne comme une installation à écoulement continu. Les échantillonnages de suivi ont démontré que les niveaux de MES sont rapidement revenus à des niveaux acceptables après la mise en œuvre d'une combinaison de nouvelles mesures de traitement et de mesures déjà en place, et sont demeurés conformes jusqu'à la fin de l'année lorsque l'écoulement était présent. Baffinland continue d'évaluer et de mettre en œuvre des mesures à cette installation.

En plus du SNP, d'autres programmes de surveillance environnementale ont été menés en 2025. Ceux-ci comprenaient le Programme de surveillance des effets du Projet sur le milieu aquatique (AEMP), le Programme de surveillance de la route Tote (TRMP), le Plan d'atténuation et de surveillance des impacts sur le milieu terrestre (TEMMP), le Plan de gestion de la qualité de l'air et de réduction du bruit (AQNAMP)

et le Plan de surveillance des effets environnementaux sur l'environnement marin (MEEMP). Ces programmes ont été réalisés conformément au certificat approuvé du Projet.

Consultation et mobilisation des communautés

En 2025, les équipes de développement communautaire et stratégique et de développement durable de Baffinland ont poursuivi leur mobilisation auprès des communautés en proximité du Projeten comprenant aussi le volet d'expansion pour Steensby. Baffinland a tenu des réunions en présentiel et virtuelles, en privilégiant les interactions en personne lorsque possible, afin d'assurer une communication efficace. Diverses plateformes, telles que les médias sociaux et la radio FM, ont été utilisées pour accroître la transparence et l'accessibilité pour les résidents locaux. Les premières activités de mobilisation visant à partager des mises à jour du Projet comprenaient des consultations communautaires avec une participation téléphonique à Kinngait et Kimmirut. Ces premières activités ont été suivies de visites régulières en personne tout au long de l'année.

La consultation des communautés s'est poursuivie au courant de l'année et a été marquée notamment par une tournée collaborative du gouvernement du Canada en mars, qui a réuni Baffinland, des représentants fédéraux avec les communautés de Pond Inlet, Kimmirut, Kinngait, Igloolik, Sanirajak, Arctic Bay et Clyde River. D'autres activités de consultation et de mobilisation ont aussi eu lieu, incluant : : des séances d'information sur l'emploi et la formation, des activités de mobilisation du Programme de préparation à l'emploi, et un soutien aux processus réglementaires, y compris l'audience relative au permis d'utilisation des eaux de type « A », ainsi que des réunions de gouvernance régionale réunissant plusieurs organisations de chasseurs et de trappeurs. Les équipes de développement communautaire et stratégique et de développement durable ont également participé à des célébrations communautaires et à des événements régionaux majeurs, notamment le 50^{e} anniversaire de la municipalité de Pond Inlet, la Nunavut Quest, la Qamutik Cup, la Semaine minière du Nunavut. De plus, les équipes ont participé à des forums nationaux et régionaux tels que le Northern Lights Tradeshow, le Sommet sur la souveraineté et la sécurité dans l'Arctique et le 40e anniversaire de Nunavut Sivuniksavut. Les efforts de recrutement au Collège Algonquin ont soutenu le renforcement des capacités futures, tandis que des réunions avant et après la saison de navigation avec les municipalités et les partenaires de Pond Inlet ont permis d'assurer une communication claire et une coordination des activités marines saisonnières. Baffinland a également fourni des aliments traditionnels pour des célébrations à Pond Inlet et a participé à plusieurs opérations de recherche, de sauvetage et de récupération en mobilisant un hélicoptère pour soutenir les communautés concernées.

Résumé des plans pour 2026

Le plan de travail 2026 a été préparé par Baffinland et transmis aux parties prenantes le 31 octobre 2025, conformément à l'article 6.1 du bail commercial et à la partie J, point 2 du permis d'utilisation des eaux de type « A », aux fins d'examen annuel des garanties pour les activités réalisées sur une base annuelle.

Le plan de travail 2026 décrit le développement et l'exploitation de la mine, le concassage du minerai et son transport terrestre, son entreposage et son expédition maritime, ainsi que le développement et la construction continus des infrastructures requises au port de Milne, le long de la route Tote et sur le site

minier. L'exploitation des carrières autorisées, des sites d'emprunt et des installations de rétention des déchets, ainsi que les expéditions logistiques aériennes et maritimes d'équipement, de carburant et de fournitures se poursuivront. Des programmes d'exploration régionale, la surveillance environnementale vont se poursuivre au site du Projet et des améliorations de la route Tote visant à améliorer la sécurité et le passage des poissons sont prévus. Des activités limitées devraient se poursuivre le long du chemin de fer de Steensby et dans les zones du port de Steensby afin de soutenir la planification finale de la construction. Ces activités devraient être réalisées dans le cadre des autorisations existantes et seront, au besoin, inclues dans le cycle de rapport annuel pour la période 2026.

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ABBREVIATIONS

ABA ..... Acid Base Accounting
AEMP ..... Aquatic Effects Monitoring Plan
ALS ..... ALS Canada Ltd.
Baffinland ..... Baffinland Iron Mines Corporation
CCME ..... Canadian Council of Ministers of the Environment
CF ..... Crusher Facility
CIRNAC ..... Crown Indigenous Relations and Northern Affairs Canada
CLSP ..... Camp Lake Settling Pond
CLT ..... Camp Lake Tributary 1
CMMS ..... Computerized Maintenance Management System
COC ..... Chain of Custody
Commercial Lease ..... Commercial Lease No. Q13C301
CPHO ..... Chief Public Health Officer
CREMP ..... Core Receiving Environment Monitoring Program
CSR ..... Construction Summary Report
CWS ..... Canadian-wide Standards
DFO ..... Fisheries and Ocean Canada
ECCC ..... Environment and Climate Change Canada
EDI ..... Environmental Dynamics Inc.
EEM ..... Environmental Effects Monitoring
EOR ..... Engineer of Record
ERP ..... Early Revenue Phase
ESC ..... Erosion and Sediment Controls
FDP ..... Final Discharge Point
FEIS ..... Final Environmental Impact Statement
FWSSWMP ..... Fresh Water Supply, Sewage and Wastewater Management Plan
GN ..... Government of Nunavut
HWB ..... Hazardous Waste Berms
IFC ..... Issued for Construction
IOL ..... Inuit Owned Land
Landfill Facility ..... Mine Site Non-Hazardous Waste Landfill Facility
LDFG ..... Landfill Gate Tributary Outfall
LDL ..... Lowest Detection Limit
LGL ..... LGL Limited
LOA ..... Letter of Advice
LTWMP ..... Long Term Water Management Plan
MAC ..... Maximum Acceptable Concentration
MBR ..... Membrane Bioreactor

MDMER ..... Metal and Diamond Mining Effluent Regulations
Mine Site ..... Mary River Mine Site
MISL ..... Mining Impact Specialists Limited
mL ..... Milliliter
mg/L ..... Milligrams per Liter
MRTF ..... Mining Impact Specialists Limited
MSC ..... Mine Site Complex
Mt ..... Million Tonnes
Mtpa ..... Million Tonnes Per Annum
NIRB ..... Nunavut Impact Review Board
Non-AG ..... Non-Potentially Acid Generating
NT-NU ..... Northwest Territories-Nunavut
NWB ..... Nunavut Water Board
OEN ..... Options Exercise Notice
OHS ..... Occupational Health & Safety
OPEP ..... Oil Pollution Emergency Plan
OPPP ..... Oil Pollution Prevention Plan
OWTS ..... Oily Water Treatment System
PAG ..... Potentially Acid Generating
PHE ..... Public Health Emergency
PIP ..... Production Increase Proposal
PLC ..... Programmable Logic Controller
PM ..... Preventative Maintenance
PWSP ..... Polishing Waste Stabilization Pond
QA ..... Quality Assurance
QC ..... Quality Control
QE ..... Qikiqtaaluk Environmental
QIA ..... Qikiqtani Inuit Association
ROM ..... Run of Mine
RPD ..... Relative Percent Difference
SCP ..... Spill Contingency Plan
SDLT ..... Sheardown Lake Tributary 1
SFE ..... Shake Flask Extraction
SRM ..... Standard Reference Material
SMP ..... Snow Management Plan
SNP ..... Surveillance Network Program
SOP ..... Sustaining Operations Proposal
STP ..... Sewage Treatment Plants
SWAEMP ..... Surface Water and Aquatic Ecosystem Management Plan
TARP ..... Trigger Action Response Plan

TCLP.....Toxicity Characteristic Leaching Procedure
TCMSS.....Transport Canada Marine Safety and Security
TDG.....Transportation of Dangerous Goods
TDGA.....Transportation of Dangerous Goods Act
TDS.....Total Dissolved Solids
the Mine Site.....Mary River Mine Site
the Port Site.....Milne Port Facility
the Project.....Mary River Project
Tote Road.....Milne Inlet Tote Road
TOG.....Total Oil and Grease
TRMP.....Tote Road Monitoring Program
TRAN.....Tote Road Adjustment Notice
TREEP.....Tote Road Earthworks Execution Plan
TSS.....Total Suspended Solids
Type 'A' Water Licence.....Type 'A' Water Licence - 2AM-MRY1325 – Amendment No. 1
Type 'B' Water Licence.....Type 'B' Water Licence - 2BE-MRY2131
VEC.....Valued Ecosystems Components
WHO.....World Health Organization
WRF.....Waste Rock Facility
WRMP.....Waste Rock Management Plan
WSCC.....Workers' Safety & Compensation Commission
WTP.....Water Treatment Plant
WWTP.....Waste Water Treatment Plant

1 INTRODUCTION

1.1 PURPOSE AND SCOPE

This report to the Qikiqtani Inuit Association (QIA) and the Nunavut Water Board (NWB) summarizes activities and environmental monitoring completed in 2025 at the Mary River Project (the Project) under Baffinland Iron Mines Corporation's (Baffinland) Type 'A' Water Licence 2AM-MRY1325 – Amendment No. 1 – and, effective April 28, 2025, Type 'A' Water Licence 2AM-MRY2540 (Type 'A' Water Licence; NWB, 2015, 2025), the Commercial Lease No. Q13C301 (Commercial Lease; QIA, 2013) with QIA, and Crown Land leases for the Tote Road (N2019Q0011) and Bruce Head (N2019J0010). All annual reporting requirements for the Commercial Lease, except a summary of the exploration and drilling activities conducted in 2025, are included within this report. A separate annual report has been prepared for the QIA and NWB that summarizes the 2025 exploration and geotechnical activities conducted under Baffinland's Type 'B' Water Licence 2BE-MRY2131 (Type 'B' Water Licence; NWB, 2021b) the Commercial Lease, as well as the 2025 QIA Land Access Authorizations (QL2-2520 & QL2-2521), and the Crown Land Use Permit for Steensby Inlet (N2019C0009). Concordance tables referencing where in this report the annual reporting requirements outlined in the Commercial Lease and Type 'A' Water Licence have been met are presented in Appendix A. Baffinland's responses to select comments that were identified by the NWB following the October 1 and 15th intervenor comment response submissions for further follow up and inclusion on the 2024 QIA and NWB Annual Report for Operations are provided in Appendix E.13, as supplemental information to support the 2025 NWB Annual Report.

The Project completed the public hearing process for renewal of the Type 'A' Water Licence in March, 2025, and was issued 2AM-MRY2540 on June 9, 2025. An update on the status of Baffinland's commitments made through the public hearing process is provided in Appendix E.13.2.

The Type 'A' Water Licence includes provisions for sampling programs that involve recording data related to the volume of water extracted for any purpose, testing of effluents (e.g., treated sewage effluents) discharged to the environment, and monitoring water quality within specific Project areas (e.g., surface discharge downstream of Project infrastructure during construction, storm water from containment structures, etc.). These data are summarized and referenced in the completed NWB Annual Report Forms, included as Appendix B, and are described in greater detail in the subsequent sections.

Figure 1 and Figure 2 present the locations of the key areas associated with the Project where activities in 2025 were undertaken. These areas included Milne Port (Figure 3), the Milne Inlet Tote Road (Tote Road; Figure 4) and the Mary River Mine Site (Mine Site; Figure 5). Accommodations at the Mid-Rail Camp and Steensby Port, as shown in Figure 6 and Figure 7, respectively, remained closed and unoccupied during 2025. The Bruce Head camp, shown in Figure 8, was occupied throughout the shipping season of 2025 in support of the marine monitoring studies conducted in Milne Inlet and along the shipping route. See Appendix D – Photo Journals for detailed photos of various site activities and infrastructure.

1.2 REGULATORY FRAMEWORK

Although the key regulatory and legal documents that relate to this report are the Commercial Lease and the Type 'A' Water Licence, this report is presented in the context of other applicable regulatory authorizations and schedules for the Project (QIA, 2013; NWB, 2025). A list of the key regulatory permits, approvals and authorizations that allowed for completion of work at the Project in 2025 is presented in Table 1.1.

2 PROJECT ACTIVITIES, MODIFICATIONS AND INFRASTRUCTURE CHANGES

2.1 OVERVIEW OF PROJECT

The Mary River iron ore deposits on North Baffin Island are considered to be one of the largest and highest quality iron ore open pit deposits in the world. The Project currently comprises an operating open pit iron ore mine and deep-water port (Milne Port) that is operated by Baffinland and jointly owned by ArcelorMittal and The Energy and Minerals Group.

The Project is located in the Qikiqtani Region of Nunavut on northern Baffin Island, approximately 160 kilometers south-southwest of the nearest community of Pond Inlet (Mittimatalik) and 1,000 Km north-northwest of the territorial capital of Iqaluit (Figure 1). The current mine operation is expected to last for more than 20 years, with the ability for the operation to last for generations if allowed to expand to include other deposits which have been identified. This represents a potential multi-generational opportunity for resource-driven socio-economic development in the North Baffin region.

The Project has gone through a number of important milestones prior to operating at the 2025 approved production rate of 4.2 Million Tonnes Per Annum (Mtpa). Baffinland's initial proposal consisted of mining iron ore from the reserve at Deposit No. 1 and using a port south of the mine in Steensby Inlet, serviced by an approximately 149 Km Steensby Railway to transport the ore to market (i.e., Southern Transportation Corridor; Figure 1). The NIRB issued Project Certificate No. 005 for this proposal on December 28, 2012.

From 2013 to 2014, in response to changing iron ore market price conditions, Baffinland prepared an alternative development approach, the Early Revenue Phase (ERP), supported by an addendum to the Final Environmental Impact Statement (FEIS) (Baffinland, 2013) for the Mary River Project. The Project Certificate was subsequently amended to include the mining of 4.2 Mtpa of ore to be hauled on the existing Milne Inlet Tote Road (Tote Road) north to a port at Milne Inlet (Milne Port). In 2018, 2020 and 2022 the Project Certificate was amended following approval of the Production Increase Proposal (PIP), PIP Extension Request, and PIP Renewal (PIPR), (Stantec, 2018, Baffinland, 2019, Baffinland, 2022b) allowing for up to 6 Mtpa to be transported and shipped through Milne Port until the end of 2022. In the fall of 2023, the Nunavut Impact Review Board (NIRB) returned positive recommendations to the responsible Minister for Baffinland's Sustaining Operations Proposal (SOP) (Baffinland, 2023). As a result, Baffinland continued to operate at 6 Mtpa for the reminder of 2023 and for the duration of 2024. The SOP included approval to ship additional ore that remained at Milne Port in 2022 offsite during subsequent shipping seasons. This allowed Baffinland to continue to operate with no changes to the Early Revenue Phase (ERP) approval conditions.

To adapt to evolving iron ore market price conditions and support the long-term sustainability of the Project, Baffinland suspended the Sustaining Operations Proposal (SOP2) application for the 6.0 Mtpa trucking operation in the fall of 2024. A reduction in workforce was implemented to align with a 4.2 Mtpa operation. In 2025, Baffinland decreased ore transportation compared to previous years operations under the Production Increase Proposal and Sustaining Operations Proposal Approvals. In 2025 Baffinland

returned to Early Revenue Phase transportation limits of 4.2 Mtpa. Mining and hauling activities from the Mine Site to Milne Port continued throughout 2025, with 4.2 Mt of iron ore hauled using the Tote Road and stockpiled at Milne Port. The transportation activities required to transport the stated volumes remained within those presented and assessed in the ERP FEIS Addendum. In 2025 Baffinland focused on securing key regulatory authorizations for the Steensby Railway component of the Project. In 2026, Baffinland intends to sustain the current level of operations, while continuing to focus efforts and resources on the development of the Steensby Component of the Project.

During the ERP phase, the Project includes three (3) primary components (Figure 2):

- Mary River Mine Site (the Mine Site);
- Milne Inlet Tote Road (the Tote Road); and
- Milne Port facility.

Operational activities include:

- Ore extraction;
- Ore processing via crushing;
- Transportation of the ore from the Mine Site to Milne Port via the Tote Road;
- Loading and shipping of ore from Milne Port;
- Stakeholder and Inuit community engagement; and
- Environmental monitoring and reporting.

In addition to the primary components of the current operation, the Approved Project includes construction, operation, closure and post-closure activities associated with the Steensby component of the Project, currently under planning and development, including the following proposed Project components:

- A 149 Km Steensby Railway from the Mine Site to a new port facility at Steensby Inlet (Figure 7);
- Steensby Port, which will operate year-round; and
- Shipping along the Southern Shipping Route (Foxe Basin - Hudson Strait).

2.2 SUMMARY OF 2025 PROJECT ACTIVITIES

The Project activities undertaken in 2025 were conducted at Milne Port, the Mine Site and along the Tote Road. No Project activities were undertaken related to the development of the Steensby Railway or at Steensby Port in 2025. Detailed engineering and planning of the Steensby component continues to progress.

Project activities, modifications and infrastructure changes are summarized in Table 2.1.

Operation activities in 2025 included:

- The continued development and construction of Project infrastructure required at Milne Port and the Mine Site, and along the Tote Road;

- Mining of Deposit No. 1 and crushing, and stockpiling of the ore at the KM 106 Stockpile Facility and the Mine Site Crusher Facility;
- Transportation of ore using ore haul trucks from the Mine Site to Milne Port for stockpiling;
- Shipping of ore to international markets via the Milne Port Shiploader and ore carrier vessels;
- Placement of waste rock from Project operations at the Waste Rock Facility while continuing operation and monitoring at the Waste Rock Facility Pond (MS-08) to ensure discharged water meets applicable criteria;
- Placement of NAG construction grade material for construction of a Mine Site Laydown Area adjacent to the crushing facilities where aggregate is produced;
- Continued stockpiling of ore at the Milne Port Ore Stockpile Facility prior to and following the 2025 shipping season;
- Continued year-round operation of camp facilities at the Mine Site and Milne Port, and seasonal operation of the Bruce Head camp for marine monitoring programs, which included the use of water and deposition of waste as authorized under existing permits;
- Multiple sealifts, including shipments off the Project to Southern Canada and the delivery of fuel, equipment, and supplies to support Project operations and development;
- Transportation of fuel and other supplies from Milne Port to the Mine Site to support operations and development;
- Operation of aircraft logistics to supply the Project with personnel and supplies;
- Operation of helicopter and fixed wing aircraft to support sampling associated with the Steensby Railway fisheries application, and environmental monitoring and other general Project activities;
- Care and maintenance of the inactive Steensby Port camp;
- Continued progressive reclamation of areas of current and past use;
- Progressive reclamation of priority historic borrow sources continued along the Tote Road. (Refer to Appendix C.1.6 for the Reclamation Report);
- Placement of inert non-hazardous waste at the Mine Site Non-Hazardous Waste Landfill Facility (Landfill Facility);
- Utilised and tracked water for domestic and industrial purposes at approved sources;
- Development of the KM 97 Borrow Source continued for material for Project use;
- Use of blasted material from the Q1 Quarry;
- Construction of an additional laydown area south of the Crusher Pad and an access road to connect to laydown with the Mine Haul Road. (Refer to Appendix C.1.1 for the As-Built Report);
- Construction of an additional laydown and berm to surround the Mine Site Explosives Magazine (Refer to Appendix C.1.3 for As-Built Report);
- Water was discharged and monitored from licenced water management infrastructure;
- Continued upgrades and adaptive management at the KM 105 Facility, including constructing a filter berm, to ensure discharged water meets water licence limits at the new approved discharge location;
- Reconstruction of culvert crossing location CV-187 due to damage caused by the extreme rainfall event in September of 2024 (refer to Appendix C.1.2 for the CSR);

- Erosion and sediment potential was assessed across the site and appropriate preventative and corrective controls were implemented (refer to Appendix C.1.4, Appendix C.1.5, and Appendix C.1.8 for the As-Built Reports);
- Dust suppression using calcium chloride and water was applied regularly to Project roads utilizing approved sources;
- Application of dust suppression at the Crusher Facility to reduce dust during ore loading and transport, and at the Milne Port ore stockpiles;
- Repairing all four (4) bridges along the Tote Road (refer to Appendix C.1.7 for As-Built Report)
- Geotechnical and hydrological investigations on select water crossings; and re-construction work for various fish-bearing culvert crossings along the Tote Road progressed;
- Completed required monitoring programs as per the Type 'A' Water Licence and MDMER requirements, and under applicable management plans; and
- Continued engineering and environmental studies to support future phases of the Project.

As required by the Commercial Lease and Type 'A' Water Licence, Baffinland submitted to the NWB, QIA and Crown Indigenous Relations and Northern Affairs Canada (CIRNAC) a 2025 Work Plan on January 15, 2025 (Baffinland, 2025c). Table 2.1 reconciles the activities, construction and infrastructure changes completed in 2025 to the works proposed in the 2025 Work Plan. Baffinland submitted the 2026 Work Plan (Baffinland, 2025d) to relevant parties on October 31, 2025.

2.3 MODIFICATIONS

2.3.1 Modification Applications Summary

During 2025, no modification applications were submitted to the NWB under the Section G of the Type 'A' Water Licence, however, a modification for MS-12 is included within this annual report submission (Appendix E.12). Water Management infrastructure associated with the Km 105 Facility under Modification 13 was constructed in spring 2025 to improve surface water management at the Facility. Table 2.2 summarizes the modification applications submitted to date and their current approvals status. It does not however cover all modifications that have been submitted to the NWB, as not all have been assigned a number.

2.3.2 Modifications Implemented

The following subsections outline the construction works completed during 2025 and the current status of the Project's modifications approved by the NWB that have not been fully implemented/constructed.

2.3.2.1 Modification No.10 – Mine Site Upgrades

Expansion of the Mine Site Non-Hazardous Waste Landfill Facility (Landfill Facility) was initiated in 2018 and involved the construction of and deposition of waste at the Landfill Facility's waste cell No. 2 and 3. In 2021, construction began on a section of the Mine Site Landfarm facility (MS-05), and the Landfarm facility construction of the first two (2) cells was completed in 2022.

2.3.2.2 Modification No.11 – Installation of an Incineration Unit at Milne Port's 380-Person Camp

Following approval, Baffinland installed one (1) new incinerator to support the 380-Person Camp infrastructure at Milne Port. Prior to operating the unit, the incinerator was subject to stack testing to confirm emissions standards were being met immediately following commissioning of the unit, consistent with Project Certificate Term and Condition No. 12. Due to the results of the initial and follow up stack testing, Baffinland did not commission the incinerator unit and, in 2025, the unit was dismantled from future service.

2.3.2.3 Modification No.12 – Milne Port Ore Stockpile #1 and Water Management Expansion

The further expansion of Stockpile #1 at Milne Port was initiated in 2019 following approval of the modification request. Note that construction is divided into two (2) stages, where the second stage is dependant on receipt of a fisheries act authorization from Fisheries and Ocean Canada (DFO). Construction of the first stage was completed in 2021. The second stage has been put on hold indefinitely and was previously removed from the scope of the Project in the 20245 Work Plan.

2.3.2.4 Modification No. 13 – Mine Site Water Management (NWB, 2021)

The Long-Term Water Management Plan (LTWMP) for the Mine Site was developed with Knight Piésold in 2021 to address erosion and sedimentation at the Mine Site. In 2021, construction of the KM 105 Surface Water Management Facility (KM 105 Facility) began as part of the first phase of the implementation of the LTWMP at the Mine Site, and the construction was completed in 2022. Construction activities were also completed in the Camp Lake area in 2022 to reduce potential erosion and sedimentation in the area and minimize releases of Total Suspended Solids (TSS) to Camp Lake and its tributaries.

The LTWMP continued to be implemented in 2025 with a number of adaptive management responses implemented at the KM 105 Facility. Refer to Section 7.3.6 for further information about the KM 105 Facility, including a detailed summary of the adaptive management responses implemented in 2025 and the proposed approach for water management at the facility in 2026.

Alternative solutions remain under investigation for the Sheardown Lake Sedimentation Pond (SDLT-1) area. During 2025, three (3) additional filter berms were constructed for erosion control up-gradient of verification monitoring station MS-C-D. Planning for SDLT-1 includes alignment with future Steensby ore pad construction details, which are currently under development.

A remediation study for the QMR2 Quarry is planned for 2026, with decommissioning and reclamation potentially to occur following. As such, the development of erosion control measures is no longer anticipated to be required for active Operations Quarry use. Reclamation planning will integrate ESC principles, focusing on diverting surface water and mitigating sediment transport.

An implementation schedule for the remainder of Modification No. 13 (NWB, 2021) infrastructure is included in Table 2.3.

Part D, Item 16 in the Type 'A' Water Licence requires that Baffinland ensure the proper function of earthworks associated with facilities at the Mine Site and Milne Port such as the bulk fuel storage and ancillary fuel facilities (NWB, 2025). Annual geotechnical inspections are required to be performed by an Engineer registered in Nunavut. The annual geotechnical inspection of Project sites was conducted between July 1 and July 8, 2025. The report for the geotechnical inspection, which includes Baffinland's plan for implementing the identified recommendations, was submitted to the NWB on October 29, 2025. A copy of the 2025 Geotechnical Inspection Report is provided in Appendix C.2

2.4 OTHER INFRASTRUCTURE AND CONSTRUCTION ACTIVITIES

Other construction activities completed in 2025, not outlined in Section 2.2 and Section 2.3, focused around the ongoing maintenance and repair of existing Project infrastructure, including roads, laydowns and surface water management infrastructure; such as drainage ditches, culverts and free-span ditches including:

- Maintained and replaced surface water drainage systems, like culverts, to reduce potential erosion and sedimentation and improve water drainage across site;
- Maintenance work was conducted on the Tote Road and associated infrastructure to maintain the running surface and stability, improve water drainage and address safety and operational concerns, that did not involve in-stream work;
- Preventative and corrective measures were performed to mitigate potential sedimentation and erosion concerns, including but not limited to armouring and modifying embankment grades, installing check dams and silt fences, and clearing snow and ice from sensitive water conveyance structures;
- Surface water drainage improvements at the Landfill Facility, described in Section 5.2.3.

Erosion and sediment control (ESC) measures, which did not involve in-stream work, were installed or maintained at various Tote Road locations, to stabilize eroded areas and minimize sedimentation from the Project. Depending on conditions at the location, ESC measures may include: removing sediment accumulation from silt fencing, installing coir logs, spring berms, check dams and step pools, and maintaining road embankment armouring. Monitoring and maintenance of ESC measures continued throughout the open-water season. A full summary of ESC measures implemented in 2025, associated with fish bearing crossings, along the Tote Road, including photos, is provided in the 2025 DFO Tote Road Report in Appendix C.3.

Baffinland continued to work with the DFO to address fish passage deficiencies at select fish-bearing crossings along the Tote Road in 2025. A Request for Review was submitted to DFO in May 2022, and DFO personnel subsequently visited the Mary River site in June 2022 to inspect the fish-bearing crossing locations along the Tote Road. In 2024, designs were submitted to DFO for approval and, in January 2024, DFO issued a Letter of Advice (LOA) for Baffinland's Tote Road Culvert Remediation proposal to implement a permanent crossing solution for ten (10) high-priority culvert crossings along the Tote Road (DFO, 2024). The NWB subsequently issued approval of the submitted proposal in February 2024 for this scope of work (NWB, 2024). In parallel with the issuance of the LOA, DFO directed Baffinland on February 2024, to

remediate a further ten (10) crossings, twenty (20) in total, and to produce monitoring plans for their remediation designs.

Tote Road culvert upgrades work under the LOAs and Type 'A' Water Licence (NWB, 2025) commenced in Q1 2024 and seven (7) of the culvert crossings were remediated between February and May, 2024: CV-057, CV-059, BG-04, CV-001, CV-102, CV-106 and CV-216. Post-construction and throughout 2025, Baffinland monitored the performance of the seven (7) crossings and significant settlement was observed at CV-106 and CV-216 as a result of suspected permafrost and ice lens degradation.

The discovery of these design challenges has warranted additional engineering work and collaboration with DFO, to ensure the unique North Baffin Island environment is well understood based on lessons learned in the field, and to ensure future functionality of culvert crossings. In 2025, recognizing the challenges experienced with the original designs, Baffinland developed a plan that was submitted to DFO in June outlining a modified approach to progress the remaining priority culverts. The plan outlined that it was important for site specific hydrotechnical and geotechnical assessments to be conducted to support Baffinland's understanding of the failures observed at some of the crossings that were re-constructed. The assessments were conducted in summer 2025 with external expertise to inform on site specific design specifications for re-constructing settled crossings (CV-216 and CV-106), as well as, informing on site specific retrofits and replacement new designs for the remaining thirteen (13) priority culvert crossings. In collaboration with DFO, it was determined that some crossings could be retrofit with minor works to re-establish fish passage while others still required a complete re-construction to resolve fish passage issues. Designs and approvals are ongoing with DFO with active work occurring on approved designs in frozen conditions in Q4 2025.

In April, 2025, a single culvert was reinstalled at CV-216 to restore fish passage and water conveyance prior to freshet, following geotechnical destabilization experienced at the crossing. This was deemed required following evaluation with DFO that the crossing redesign required further work. As part of the 2025 design submissions, a specific Fisheries Act Authorization was granted in October 2025 for construction of a new crossing at CV 216, which experienced the most severe settlement after its 2024 re-construction. Construction of the new crossing commenced following the October DFO Authorization at CV-216, which experienced further settlement in the open water period of 2025. In June 2025, maintenance for a blockage of CV-187 was identified and corrective measures to reinstall and restore flow were initiated. Re- construction of CV 187 was completed June 29 referencing original designs. While fish were not observed or expected at the crossing location, fish exclusion zones were erected to ensure there was no potential for fish to interact with the culvert replacement and turbidity monitoring was conducted during periods of active instream work. During the crossing replacement, significant improvements to road embankment armouring and check dams were implemented adjacent to the crossing. Site specific retrofit works were completed in December 2025 at BG-17. Construction on identified priority crossings continue into 2026.

2.5 INBOUND AND OUTBOUND SHIPMENTS TO AND FROM THE PROJECT

Equipment, materials, consumables and fuel required for the operation and continued development of the Project were transported to Milne Port via marine shipments between August and September 2025. In 2025 inbound marine shipments included:

- Three (3) cargo sealifts to Milne Port delivering equipment, materials, and consumables; and
- Three (3) fuel shipments to Milne Port to the Milne Port Bulk Fuel Storage Facility via floating-hose transfer.

Equipment, materials, consumables and fuel received by the Project at Milne Port during 2025 are summarized in Table 2.5 and listed in Appendix E.4. Once at the Project site, received equipment, materials, consumables and fuel were either stored at Milne Port or transported to the Mine Site via the Tote Road.

Equipment and materials not required by Project operations, including non-hazardous and hazardous wastes generated by Project activities, were shipped off site from Milne Port via marine shipments between August and October 2025.

Equipment, materials, and wastes shipped off the Project site in 2025 are summarized in Table 2.4 and listed in Appendix E.4. All wastes backhauled in 2025 were unloaded at the Port of Valleyfield, Quebec and are currently awaiting commencement of processing for transport to appropriate waste disposal facilities in Quebec. No wastes were backhauled to communities in Nunavut for disposal. Details on the wastes disposed of at southern facilities in 2025 including which waste disposal facilities were utilized will be available upon request.

3 MINING AND EXPLORATION ACTIVITIES

3.1 EXPLORATION AND GEOTECHNICAL DRILLING ACTIVITIES

For details on 2025 exploration and geotechnical activities conducted within the scope of Baffinland's Type 'B' Water Licence and Commercial Lease, please refer to Baffinland's 2025 QIA and NWB Annual Report for Geotechnical Activities (Baffinland, 2026).

3.2 MINING ACTIVITIES

During 2025, mining operations at Deposit No. 1 continued to advance. A total of 4.2 Mt of ore produced by mining operations at the Mine Site was transported by ore haul trucks along the Tote Road and stockpiled at Milne Port for marine shipment to international market during the open-water shipping season.

Monthly and annual quantities of ore generated by the Project during 2025 are provided in Table 3.1.

3.3 SHIPPING ACTIVITIES

During the 2025 shipping season, a total of 4.3 Mt of ore was shipped from the Project's Milne Port to international markets. Following the shipping season, ore continued to be stockpiled at Milne Port for subsequent shipment to markets in 2026.

Monthly and annual quantities of ore shipped to international markets from the Project's Milne Port during 2025 are provided in Table 3.2. Additional information will be provided in the 2025 Annual Report to NIRB.

3.4 SPECIFIED SUBSTANCES EXTRACTED FROM QUARRIES AND BORROW SOURCES

Baffinland operates multiple quarries and borrow sources to support the Project's road maintenance and infrastructure construction. Quarries and borrow sources used during 2025 to support Project activities included the Q1 Quarry at Milne Port and the KM 97 Borrow Source near the Mine Site.

In 2025, Baffinland engaged QIA to propose an amendment to the reporting schedule, from quarterly to annual, for quarried volumes removed from quarry and borrow source operations (and for waste/soil volumes deposited in the landfill and landfarm facilities) under the Commercial Lease. The proposed reporting period uses a twelve-calendar month snow-free calculation period to ensure accuracy of reporting of volumes of material removed by eliminating data quality issues resulting from quarterly surveys conducted during snowfall and snowmelt periods which skew volume calculations. QIA conditionally supported the proposed transition from quarterly to annual reporting for a trial period of two (2) years to be followed by an evaluation to confirm the efficacy of the proposed reporting interval change. See Appendix E.8.4 for QIA and Baffinland correspondence associated with the trial annual reporting schedule.

As per agreed conditions associated with the trial transition to annual reporting (see Appendix E.8.4), and the requirements of the Commercial Lease (Part 6.4, item d) iv; QIA, 2013) and Type 'A' Water Licence (Schedule B, Item 39; NWB, 2025), Table 3.3 provides quantities of each specified substance removed

during the annual reporting period (from June 1, 2024 to June 30, 2025), broken down by individual quarry and borrow source.

4 WATER USE

During 2025, water was withdrawn from approved sources and used at Milne Port, the Mine Site and along the Tote Road for Project activities under the authorization of the Type 'A' Licence. No water was used for the 2025 exploration and geotechnical drilling activities. (Baffinland, 2025a).

Under the authorization of the Type 'A' Water Licence, freshwater was withdrawn and used by the Project during 2025 for three (3) main purposes: potable water supply for camp use, dust suppression and other industrial purposes. The following subsections describe water use at the Project during 2025.

4.1 QUANTITIES OF FRESHWATER USED FOR DOMESTIC AND INDUSTRIAL PURPOSES

Camp Lake (MS-MRY-1) was used to supply the Mine Site with freshwater for domestic and industrial purposes. Water was withdrawn from Camp Lake using a wet well jetty structure. Potable water (domestic) was transported from the jetty to water storage tanks located at the Mine Site's Potable Water Treatment Systems (Mine Site Complex, Sailiivik Camp) using heat-traced water pipelines and/or water trucks. Water required for industrial purposes at the Mine Site was withdrawn and transported from the Camp Lake jetty using water trucks or other equipment (i.e. fire trucks).

KM 32 Lake (MP-MRY-3) was used to supply Milne Port with freshwater for domestic and industrial purposes. Water was withdrawn and transported from KM 32 Lake to Milne Port using water trucks. Potable water (domestic) was pumped from water trucks into water storage tanks located at Milne Port's Potable Water Treatment Systems (Port Site Complex, Milne Port 380-Person Camp).

Water volumes withdrawn from approved water sources were monitored and documented using flow meters and/or flow extrapolation in accordance with the Type 'A' Water Licence (Part I, Item 6; NWB, 2025). Total volumes of water withdrawn and used for domestic and industrial purposes were monitored for compliance with the maximum daily withdrawal limits stipulated by the Type 'A' Water Licence (Part E, Item 4; Table 3; NWB, 2025).

Approved water source locations used for Project sites in 2025 are detailed in Table 4.1 and presented in Figure 4. Table 4.2 presents the daily, monthly, and annual volumes of freshwater withdrawn from approved water sources for domestic and industrial purposes on Inuit-Owned Lands (IOL) during 2025. As Steensby Port and Mid-Rail camps were not operated in 2025, water was not withdrawn and/or used at these Project sites in 2025. There were no exceedances of the daily withdrawal limits for domestic and industrial water uses in 2025. In 2022, Baffinland automated the system at the water jetty by connecting the flow meter to the site's Programmable Logic Controller (PLC) and implemented logic-coded programming to improve characterization of domestic and industrial daily water volumes withdrawn at the Camp Lake jetty by multiple users.

4.2 QUANTITIES OF FRESHWATER USED FOR DUST SUPPRESSION

Water was withdrawn from the approved water sources along the Tote Road, as outlined in Table 4 of the Type 'A' Water Licence (NWB, 2025), using water trucks and applied to Project roads for dust suppression purposes. Approved water source locations used for Project dust suppression in 2025 are detailed in Table

4.1 and presented in Figure 4. Daily, monthly and annual water volumes withdrawn from these approved water sources during 2025 for dust suppression purposes are outlined in Table 4.1 and Table 4.3.

Zero (0) water withdrawal exceedances occurred in 2025, representing a significant decrease relative to 2022, when thirty (30) exceedances were recorded. Performance has continued to improve year over year, with two (2) exceedances recorded in 2023 and one (1) in 2024. This decrease is attributed to strengthened procedural controls, including shift-based (day and night) tracking of daily water use at each authorized withdrawal point relative to applicable daily limits.

Tracking of water for dust suppression in 2025 continued to be done manually, and corrective actions identified in the 2023 annual report remain in place to prevent water withdrawal exceedances in the future.

Baffinland will continue to adjust and improve controls for tracking source-specific daily water withdrawal limits to continue the success shown in 2025 and maintain effective record-keeping practices for the approved dust suppression water sources.

In 2025, 224,000 kg of calcium chloride were applied to Project roadways for dust suppression. The industry-standard and recommended application rate for calcium chloride is 1.69 pounds per square yard, which equates to 14,040 kg/km when applied to the Tote Road (assuming an average width of 13 m). Baffinland has taken a conservative approach, applying calcium chloride combined with water to targeted areas along the road to reduce potential calcium chloride interactions with receiving environments.

4.3 QUANTITIES OF RECLAIMED AND RECYCLED WATER USED FOR DUST SUPPRESSION

Under the Type ‘A’ Water Licence (Part E, Item 5; NWB, 2025), water was reclaimed and recycled throughout the Project and applied to roads for dust suppression purposes. Water applied directly to dry road surfaces for dust suppression is quickly absorbed and does not leave the immediate area of use or migrate to receiving water bodies. The use of treated effluent for dust suppression eliminates the need to travel longer distances to source water and, therefore, improves the efficiency and effectiveness of dust suppression operations, reduces fuel consumption and results in faster cycle times, which increases safety by improving road conditions and visibility. It also reduces the volume of fresh water required.

In 2025, Baffinland continued to use reclaimed water from Project treatment facilities that met applicable Water Licence and the MDMER discharge criteria, with the exception of TSS in accordance with the Water Licence, for dust suppression purposes on the Project roads. Water sourced from the Crusher Facility, KM 106 Stockpile, and Waste Rock Facility (WRF) surface water management ponds (MS-06, MS-07, and MS-08) was used for dust suppression on the Mine Haul Road within mine working areas.

Water quality monitoring results for water reclaimed from Mine Site surface water management ponds are provided in Table 7.3. and Table 7.6.3. A summary of the volumes of reclaimed and recycled water used during 2025 is provided in Table 4.3.

5 WASTE MANAGEMENT

5.1 WASTEWATER MANAGEMENT

Under the Type 'A' Water Licence (NWB, 2025), the Project generated domestic sewage, retained storm water and runoff at containment areas and ore and waste rock management facilities, and discharged compliant effluents, treated and untreated, to receiving environments at Milne Port and the Mine Site during 2025. Wastewater and effluents generated in 2025 were managed in accordance with the Project's Fresh Water Supply, Sewage and Wastewater Management Plan (BIM-5200-PLA-0022). Steensby Port and the Mid-Rail camp remained closed in 2025 and as a result no wastewater was generated and/or discharged at these Project sites. Domestic sewage from the Bruce Head camp was stored and then transported to the Milne Port Sewage Treatment Plant for treatment and discharge.

5.1.1 Quantities of Sewage Effluent and Sludge from STPs and PWSPs

Throughout 2025, residual sewage sludge (sludge) and treated sewage effluents were generated at the Project's Sewage Treatment Plants (STPs), equipped with Membrane Bioreactor (MBR) technology. Sewage wastes generated by the Project are treated and managed using the following facilities:

- Mine Site STP No. 1 (MS-01)
- Mine Site STP No. 2 (MS-01B);
- Mine Site Polishing Waste Stabilization Ponds (PWSPs; MS-MRY-04A, B, C);
- Milne Port STP (MP-01);
- Milne Port STP (MP-01B); and,
- Milne Port PWSP (MP-01A).

At the Mine Site, treated sewage effluent that met the applicable water quality discharge criteria stipulated in the Type 'A' Water Licence was either directly discharged via a dedicated pipeline (MS-01 and MS-01B) or transported by vacuum truck to the approved discharge location located near the Mary River (NWB, 2025). Mine Site STP MS-01 was shut-down in late December 2024 and remained shut-down in 2025as sufficient treatment capacity for sewage wastes generated at the Mine Site was achieved via STP MS-01B.

At Milne Port, compliant treated sewage effluent from the Milne Port STP (MP-01) and the 380-Person Camp (MP-01B) was either directly discharged via a dedicated pipeline or transported by truck to the approved discharge point near Milne Inlet.

As part of routine operation of the Project's STPs, dewatered sludge (cake) generated at the STPs was removed regularly and transported to site incinerators for disposal. Cake that could not be incinerated onsite during 2025 was shipped off site during the Milne Port backhaul sealift for disposal at a licensed waste disposal facility in Southern Canada.

During 2025, PWSPs at the Mine Site and Milne Port were utilized to store treated sewage effluent that did not meet the discharge criteria stipulated in the Type 'A' Water Licence. When conditions required it, sewage, inclusive of non-compliant effluent, and sludge were transported to PWSPs for temporary

storage. In 2025, PWSP effluent was managed via reprocessing/treatment through Project STPs, and pond-to-pond transfer strategies if required, in accordance with Baffinland's Fresh Water Supply, Sewage, and Wastewater Management Plan (BIM-5200-PLA-0022), to ensure adequate PWSP capacity and wastewater treatment.

Daily, monthly and annual quantities of sewage effluent discharged from Project STPs and PWSPs to approved discharge locations are provided in Table 5.1. Table 5.2 presents the quantities of sewage and sludge diverted to the PWSPs from accommodation facilities as well as the quantities of cake removed from Project STPs and incinerated or backhauled for off-site disposal.

Figure 3 and Figure 5 show the locations of the Milne Port and Mine Site STPs, PWSPs and approved discharge points.

5.1.2 Quantities of Effluent from Containment Areas

During 2025, storm water retained within containment areas associated with the Project's bulk fuel storage facilities and hazardous materials storage berms (HWB) was analysed in accordance with the Type 'A' Water Licence (Part F, Item 9; NWB, 2025), treated if required using the mobile Oily Water Treatment System (OWTS), and discharged to the receiving environment. Storm water analysed and demonstrated to be compliant with the applicable water quality discharge criteria stipulated in the Type 'A' Water Licence was directly discharged to the receiving environment using pumps and non-rigid hose.

At Milne Port effluent was discharged from Milne Port Fuel Storage Facility MP-03 in June and July, which did not require OWTS treatment as confirmed by analytical monitoring. Effluent discharge also occurred at the Milne Port Landfarm Facility (MP-04) in August, which did not require OWTS treatment as confirmed by analytical monitoring.

At the Mine Site, the OWTS was operated in June at the Hazardous Materials Storage Area No. 7 (MS-MRY-06). Effluent was also discharged from Mine Site Bulk Fuel Storage Facilities MS-03 in August and MS-03B in July, and from the Mine Site Landfarm facility (MS-05) in September, which did not require OWTS treatment as confirmed by analytical monitoring).

During 2025, a total of approximately 6,259 m^3 of storm water was discharged from Project fuel containment areas. Table 5.3 provides the daily, monthly and annual volumes of effluent discharged from Project containment areas at the Mine Site and Milne Port during 2025.

Figure 3 and Figure 5 show the locations of the Milne Port and Mine Site containment areas associated with the bulk fuel storage facilities, hazardous materials storage berms, the Milne Port Landfarm and Contaminated Snow Containment Facility, and the Mine Site Landfarm Facility.

5.1.3 Quantities of Effluent from Surface Water Management Ponds

To manage and monitor storm water retained by ore and waste rock management facilities, the following six (6) surface water management ponds have been established at the Project:

Mine Site

- Crusher Facility Pond (MS-06);
- Run-of-Mine (ROM) Ore Stockpile Facility (KM 106 ROM Pond; MS-07);
- Waste Rock Facility Pond (WRF Pond; MS-08); and
- KM 105 Facility (MS-11).

Milne Port

- Ore Stockpile - East Pond (MP-05); and
- Ore Stockpile - West Pond (MP-06).

Storm water retained by Project ore and waste rock management facilities at Milne Port and the Mine Site is directed to surface water management ponds by a network of berms and ditches established around the perimeter of each facility.

At the Mine Site, approximately 256,282 m^3 was actively discharged from the WRF Pond (MS-08) through an approved Final Discharge Point (FDP) within the catchment of Mary River Tributary F. MS-08 Discharged in June, July, August and September, and flow measurements were recorded using an inline flowmeter and totalizer on the discharge pipeline. Total volumes of approximately 2,500 m^3 and 4,451 m^3 was actively discharged from the Crusher Facility Pond (MS-06) and KM 106 ROM Pond (MS-07), respectively, in 2025. Effluent was discharged using portable pumps to the approved discharge location. MS-06 only discharged during the month of July, while MS-07 discharged in July and September, and flow measurements were completed using inline flow meters and totalizers at both facilities. A estimated of 591,339 m^3 was released from the KM 105 Facility (MS-11). MS-11 Discharged continuously from May through to early October. Discharge quantity was initially estimated through daily flow measurements at the MS-11 monitoring location. Following the onset of consistent warmer temperatures and ice-free conditions in June, pressure transducers were installed on June 1 at the downstream hydrology station (MS-C-A/B) for estimating discharge volumes. Following removal of the pressure transducers on September 9 with the onset of colder temperatures and snowfall in the region, weekly spot flow measurements were collected to estimate discharge and were extrapolated to represent the corresponding week until frozen conditions prevailed at MS-11 following October 6, 2025.

At Milne Port, approximately 26,096 m^3 of effluent was actively discharged from the Milne Port Ore Stockpile Pond MP-06 to Milne Inlet during 2025 using pumps and non-rigid hose. Any storm water contained in Pond 3, which is located along the west perimeter of the Ore Pad, was pumped from Pond 3 to MP-06, where the water quality was monitored. No effluent was discharged directly from MP-05 in 2025; effluent from MP-05 was transferred to MS-06, then discharged, to provide additional settling time.

Table 5.4 provides the daily, monthly and annual quantities of effluent discharged from Project surface water management ponds during 2025. Inline flow meters and pumping rate extrapolation were used to monitor volumes discharged to the receiving environment.

Figure 3 and Figure 5 show the locations of the surface water management ponds located at Milne Port and the Mine Site, respectively.

5.2 SOLID AND HAZARDOUS WASTE MANAGEMENT

During 2025, Project operations generated various waste types, including domestic (putrescible, incinerator), hazardous, and non-hazardous wastes. Waste types were managed as outlined in the Project's Waste Management Plan (BIM-5200-PLA-0013), and Hazardous Materials and Hazardous Wastes Management Plan (BIM-5200-PLA-0007), utilizing the following facilities at the Mine Site and Milne Port:

Mine Site

- Waste Management Building (includes incinerator);
- Hazardous waste and materials containment berms (includes MS-HWB-1 to MS-HWB-7) and polishing waste stabilization ponds (MS-MRY-4A, B, C);
- Non-Hazardous Waste Landfill Facility;
- Mine Site Landfarm Facility (MS-05); and,
- Open Burning Facility (near KM 98).

Milne Port

- Waste Management Building (includes incinerator);
- Hazardous waste and materials containment berms (includes MP-HWB-1 to MP-HWB-4) and polishing waste stabilization pond (PWSP-MP-01A);
- Milne Port Landfarm Facility (MP-04) (hydrocarbon impacted soil) including the Contaminated Snow Containment Berm (MP-04A);
- Open Burning Facility (near KM 5).

Locations of the Project waste management facilities listed above are detailed in Table 5.5 and presented in Figure 3, Figure 4, and Figure 5. Steensby Port and the Mid-Rail Camp remained closed in 2025 and as a result no wastes were generated and/or managed at these Project sites. All waste generated during activities at the Bruce Head Camp was transported to Milne Port waste management facilities for disposal.

Monitoring of the non-hazardous solid waste landfill and hazardous waste and materials containment berms at the Mine Site includes a groundwater monitoring program. The monitoring well network is designed to monitor the seasonal groundwater levels and water quality within the active layer. In 2025, the groundwater monitoring program included collection and analysis of water from monitoring well locations at the Landfill Facility and the Mine Site Hazardous Waste Berm (HWB) Facility.

For further information on the 2025 Groundwater Monitoring Program, refer to Section 7.7 and Appendix E.11.

The following subsections describe the waste management and disposal activities conducted at the Project during 2025.

5.2.1 Site Incinerators

In 2025, Mine Site and Milne Port incinerators were operated throughout the year to incinerate solid waste as per internal waste sorting and regulatory guidelines, including the Environmental Guideline for

the Burning and Incineration of Solid Waste (GN, 2012), the Canadian Council of the Ministers of the Environment (CCME) Canadian-wide Standards (CWS) for Dioxins and Furans (CCME; 2001), and CCME CWS for Mercury Emissions (CCME; 2000), and the Project's Waste Management Plan (BAF-PH1-830-P16-0028). Refer to Section 9.4 for information pertaining to 2025 monitoring activities completed for incinerator bottom ash generated at the Project.

5.2.2 Open Burning

Open burning was conducted throughout 2025 as a method to dispose of untreated wood, cardboard, and paper products generated on site as per Baffinland's Open Burning of Untreated Wood, Cardboard and Paper Products Procedure (BAF-PH1-300-PRO-0001). Open-burning disposal reduces the volume of inert waste directed to Project incinerators and the Mine Site Non-Hazardous Landfill Facility (Landfill Facility). Baffinland's open-burning procedures within the Wase Management Plan prohibits the burning of hazardous wastes, non-combustible materials, food waste, plastics, Styrofoam and/or treated wood products, with the exception of select blasting materials as per NRCAN industry standards. To ensure removal of prohibited waste, manual secondary waste segregation was completed during the loading process at Project open burn facilities. Bottom ash generated from open burn activities is suitable to be deposited at the Project's Landfill Facility.

Open burning locations at Milne Port and the Mine Site are shown in Figure 4 and Figure 5, respectively.

5.2.3 Mine Site Landfill Facility

In 2025, inert, non-combustible wastes (plastics, used construction materials, scrap metal, glass, etc.) generated by Project activities were deposited at the Landfill Facility located at the Mine Site. Non-hazardous wastes, including ash from Project incinerators and open-burning activities, and non-hazardous waste that could not be salvaged, were also deposited at the Landfill Facility. Disposal of domestic (food) waste, hazardous and biomedical materials at the Landfill Facility is prohibited. Visual inspections of the Landfill Facility were completed and documented throughout 2025 to ensure operational compliance to the Project's Waste Management Plan (BAF-PH1-830-P16-0028). These inspections are scheduled as part of regular inspections of structures designed to contain, withhold, divert or retain waters or wastes during periods of flow; conducted in accordance with the Type 'A' Water Licence (Part E, Item 11; NWB, 2025) (BAF-PH1-300-P25-002). Any items requiring corrective actions identified during the inspections are identified and follow up actions scheduled. Baffinland also continues to focus on ongoing employee training around waste management and ongoing continuous improvement of housekeeping and debris management across the Project. In 2025, dedicated resources were partitioned within Operations to produce a specific waste and water Services department in efforts to optimise performance.

In 2025, Baffinland engaged QIA to propose an amendment to the reporting schedule, from quarterly to annual, for waste/soil volumes deposited in the landfill and landfarm facilities (as well as for quarried volumes removed from quarry and borrow source operations) under the Commercial Lease. The proposed reporting period uses a twelve-calendar month snow-free calculation period to ensure accuracy of reporting of volumes of material placed by eliminating data quality issues resulting from quarterly surveys conducted during snowfall and snowmelt periods which skew volume calculations. QIA conditionally

supported the proposed transition from quarterly to annual reporting for a trial period of two (2) years to be followed by an evaluation to confirm the efficacy of the proposed reporting interval change. See Appendix E.8.4 for QIA and Baffinland correspondence associated with the trial annual reporting schedule.

A total of approximately 3,470 m^3 of waste was deposited at the Landfill Facility during the annual reporting period (from July 1, 2024 to June 30, 2025). Table 5.6 provides the quantities of waste deposited at the Landfill Facility during the annual reporting period.

To facilitate efficient and effective waste management, waste is required to be disposed of in labelled receptacles based on waste type, and disposal methods outlined in the Waste Management Plan (BIM-5200-PLA-0013) and in Baffinland's Waste Sorting Guidelines (BIM-5200-GUI-0002). Waste generated at Project sites is sorted at the point of origin and then landfill waste, including waste from Milne Port, is collected in designated landfill roll-off bins and transported by roll-off truck to the Mine Site Landfill Facility.

In follow-up to the waste audit conducted in 2024, comprehensive waste management implementation guides were developed in 2025 for each department. Key objectives of this important training resource are to:

- Ensure all generated waste is properly identified, segregated, stored, transported, and disposed of according to regulatory and corporate standards;
- Reduce the operational workload on the Waste Management team by improving waste source-segregation at the department levels;
- Promote a shared responsibility culture where all departments understand and actively participate in waste segregation and delivery to Site Services; and
- Maintain regulatory compliance, minimize environmental impact, and reinforce Baffinland's commitment to sustainable and responsible mining operations.

In 2025, adaptive water management measures were initiated at the landfill facility in response to field observations indicating opportunities to improve local drainage conditions. Initial work included excavation of a shallow perimeter drainage berm to better direct clean surface and near-surface water away from the landfill footprint and reduce the potential for contact with waste materials. Additional assessment and any further refinement of these drainage measures will be completed in 2026. Excavated material was used to regrade select low-lying areas to support site drainage.

5.2.4 Landfarm Facilities

The Milne Port Landfarm Facility (Landfarm Facility) consists of two (2) geomembrane lined containment cells. The larger west cell is used as a landfarm for the stockpiling and bio treatment of soils contaminated by hydrocarbons from spills. The smaller east cell is used to contain hydrocarbon contaminated snow generated during winter operations. The east cell is also used as a repository for other sources of oily water at Milne Port and provides a practical location where oily water can be effectively treated at Milne Port using the OWTS.

During August 2025, effluent which did not require OWTS treatment was discharged from the Landfarm Facility (MP-04) to the tundra adjacent to the Landfarm Facility. Prior to discharge, water retained in the Landfarm Facility was sampled to ensure compliance with the applicable discharge criteria stipulated in the Type 'A' Water Licence (NWB, 2025). In 2025, effluent was not discharged from the Milne Port Contaminated Snow Containment Facility (MP-04A). Refer to Section 5.1.2 and Table 5.3 for volumes of water discharged from the Milne Port Landfarm Facility (MP-04) in 2025.

In 2025, Baffinland engaged QIA to propose an amendment to the reporting schedule, from quarterly to annual, for waste/soil volumes deposited in the landfill and landfarm facilities (as well as for quarried volumes removed from quarry and borrow source operations) under the Commercial Lease. The proposed reporting period uses a twelve-calendar month snow-free calculation period to ensure accuracy of reporting of volumes of material placed by eliminating data quality issues resulting from quarterly surveys conducted during snowfall and snowmelt periods which skew volume calculations. QIA conditionally supported the proposed transition from quarterly to annual reporting for a trial period of two (2) years to be followed by an evaluation to confirm the efficacy of the proposed reporting interval change. See Appendix E.8.4 for QIA and Baffinland correspondence associated with the trial annual reporting schedule.

In previous years, hydrocarbon contaminated soils were placed in the Landfarm Facility (MP-04) where, during summer months, remediation through natural microbiological and evaporative processes can occur. However, the Landfarm Facility reached capacity at the end of 2019. In 2025, hydrocarbon contaminated soils recovered at Milne Port were transferred to the Mine Site Landfarm Facility (MS-05), for bioremediation activities.

Table 5.7.1 provides the quantities of soil deposited at the Mary River Landfarm Facility during the annual reporting period from July 1, 2024 to June 30, 2025. Table 5.7.2 shows the monthly and annual quantities of water deposited in the Milne Port Contaminated Snow Containment Facility; however, no water was deposited in the facility in 2025.

The Mine Site Landfarm Facility currently consists of two (2) geo-membrane lined containment cells. In 2025, effluent which did not require OWTS treatment was discharged from the Mine Site Landfarm Facility (MS-05) during September to the tundra adjacent to the Landfarm Facility. Prior to discharge, water retained in the facility was sampled to ensure compliance with the applicable discharge criteria stipulated in the Type 'A' Water Licence (NWB, 2025). Refer to Section 5.1.2 and Table 5.3 for volumes of water discharged from the Mine Site Landfarm Facility in 2025.

Hydrocarbon-contaminated soil landfarm activities in 2025 were focused on assessing treatment performance and identifying practical improvements to operations under Arctic conditions. Observations from the 2025 operating season indicated that treatment effectiveness is constrained by short thaw windows, frozen and variable soil conditions, and site-specific equipment and cell access limitations. In response, Baffinland has retained a specialized engineering consultant to prepare a northern-appropriate landfarm operations and performance verification program designed to optimize biodegradation within lined treatment cells during the limited thaw period. This work includes recommendations for soil placement, conditioning and reworking methods, operating frequencies, amendment approaches, and a

monitoring framework to support adaptive management of treatment performance. Development of the revised operating approach is anticipated in 2026, together with expanded soil characterization and verification sampling.

5.2.5 Hazardous Waste Storage and 2025 Backhaul Sealift

During 2025, there were three (3) sealift backhaul events for Project waste. The backhaul sealift vessels departed Milne Port in August, September and October 2025 carrying non-hazardous and hazardous waste materials generated and stored on site by the Project since the previous sealift backhaul in 2024, as well as, hazardous waste materials that were collected, packaged, and manifested at Milne Port in 2024, but not shipped offsite in 2024 during the waste backhaul program. Prior to the 2025 backhaul, hazardous and non-hazardous waste materials were collected, packaged, and manifested at Milne Port under the direction of Baffinland personnel trained and certified in TDG regulations. Additional support and guidance were provided through third-party contractors (as required) to verify compliance with packaging, labelling, and documentation requirements for hazardous waste transport. The shipment of hazardous waste materials off the Project and transport to licensed receiving facilities in Southern Canada was coordinated through Qikiqtaaluk Environmental (QE). Received waste materials will be processed at the Port of Valleyfield for transport to the appropriate waste receiving facilities in Southern Canada. Additional information pertaining to Baffinland's 2025 waste backhaul program, including inventories and shipping manifests identifying waste materials shipped off the Project in 2025 for disposal, treatment and/or recycling in Southern Canada will be available upon request following final disposal of the waste materials. No Project wastes were transported and deposited in communities located in Nunavut during 2025.

Hazardous waste materials backhauled off the Project in 2025 that are regulated by the TDGA included (in alphabetical order):

- Empty bags, last contents Ammonium Nitrate (UN 1942)
- Empty drums, last contents Aviation Fuel (UN 1863)
- Empty drums, last contents Gasoline (UN 1203)
- Rags, oily (UN 1856)

Non-hazardous and hazardous waste materials backhauled off the Project in 2025 that were not regulated by the TDGA included (in alphabetical order):

- Empty contaminated drums/containers
- Food, waste/spoiled
- Waste glycol (antifreeze)
- Grease (waste kitchen grease)
- Mixed garbage (domestic/household waste)
- Waste oil
- Waste oil filters
- Plastic, contaminated

- Sludge cakes, dewatered
- Soil, contaminated

See Appendix E.1 for the movement documents for hazardous waste transported off site in 2025. The annual volume of hazardous waste materials shipped off the property in 2025 is included in Table 4.2.

Hazardous waste and waste material generated after the 2025 backhaul sealift continues to be sorted and stored in designated waste storage areas at the Project as per Baffinland's Hazardous Materials and Hazardous Waste Management Plan (BAF-PH1-830-P16-0011). Wastes that cannot be treated, recycled or disposed at the Project will be packaged and prepared for the backhaul sealift in 2026.

5.3 WASTE ROCK MANAGEMENT

5.3.1 Mine Site Waste Rock Facility

Mining operations at Deposit No. 1 (Nuluujaak Pit) continued throughout 2025. A total of approximately 2.1 Mt of waste rock was mined during 2025. The waste rock mined at Deposit No. 1 was analytically tested based on operational testing protocols outlined in the Project's Phase 1 - Waste Rock Management Plan (BAF-PH1-830-P16-0029). Based on the analytical testing results, mineable waste rock units were classified as Potentially Acid Generating (PAG) or Non-Acid Generating (Non-AG). The waste rock sample results from the 2025 operational testing program are discussed in Section 9.6 and provided in Appendix E.6. All PAG waste rock units mined in 2025 were deposited at the WRF. Table 5.8 presents the monthly and annual quantities of waste rock generated, deposited at the WRF and used for construction purposes in 2025.

6 REPORTED INCIDENTS

6.1 SPILLS

During 2025, ten (10) spills were reported to the Northwest Territories-Nunavut (NT-NU) Spill Report Line, as presented in Table 6.1. This is a 29% reduction from 2024 when fourteen (14) spills were reported. Sediment/sediment-laden water, and untreated sewage remained the most commonly spilled products reported.

In addition to the original spill report submitted within 24 hours of each spill event in 2025, a detailed follow-up report was submitted within thirty (30) days of each reported spill. The follow-up reports included a detailed description of the event, the immediate cause(s), corrective and preventative action(s), photos, and a map showing the location of the spill.

All spills reported to the NT-NU Spill Line in 2025 are summarized in Table 6.2, including the corrective actions taken or planned to prevent a similar reoccurrence. The 2025 spill locations are presented in Figure 9. The follow-up spill reports and original spill notifications are provided in Appendix E.8.3.

Of the ten (10) spills reported to the NT-NU Spill Report Line, seven (70%) of them occurred at the Mary River site, two (20%) occurred at Milne Port, and one (10%) occurred along the Tote Road. The frequency of reportable spills in 2025 were as follows: sediment-laden water (3), untreated sewage (3), effluents that were below guidelines but through unapproved locations (2), hydraulic oil (1), and Arctic Diesel fuel (1).

A general analysis of reportable and non-reportable spills that occurred in 2025 indicated that the most common causes of spills were related to equipment failure (46%) and improper procedure (25%) (Project personnel not following established procedures when carrying out a task, or inadequate procedure or training), followed by component malfunction (14%). The analysis also indicated the most immediately apparent causes of reportable spills in 2025 were equipment failures. Potential deficiencies of water management infrastructure may have contributed to the five (5) reportable spills of sediment laden water and treated or raw water in 2025; representing 50% of the reportable spills.

Baffinland continues to conduct robust incident investigations to identify root causes of reportable incidents so that effective long-term corrective actions can be taken to prevent similar incidents in the future. An incident investigation was conducted for all reportable spills to assist in determining the root cause and in identifying effective corrective actions.

A summary of general initiatives undertaken by Baffinland to reduce the frequency and severity of spills include:

- Snow management improvements;
- Weekly freshet planning meetings with operations departments;
- Preventative and mitigative erosion and sediment controls (ESC) implementation;
- Ditching maintenance and surveillance;
- Pond volume management;

- Greywater lift station surveillance and maintenance management;
- Mandatory internal spill reporting enforced at all levels in the organization for spills of any size;
- Enhanced preventive maintenance plans;
- Prescribed training sessions;
- Ongoing daily pre-operational checks of all equipment;
- Site-wide communication bulletins (i.e. spill reporting, secondary containment and spill tray usage memos);
- Tool box meetings focusing on spill reduction topics; and

Preventative measures for site sedimentation include infrastructure implemented under the LTWMP, and adaptive management responses to water management and conveyance infrastructure which included, repairing and armouring water crossings and performing maintenance on ditching and constructing check dam structures. Additional water management infrastructure is being evaluated under Modification No. 13, in alignment with future Steensby infrastructure engineering and construction. Refer to Section 2.3.2 for a summary of Modification No. 13 implementation and planned future work, and Section 7.3.6 for further information about the KM 105 Facility, including a detailed summary of the adaptive management responses implemented in 2025 and the proposed approach for water management at the facility in 2026.

Baffinland also continued to implement preventative and corrective sedimentation controls and mitigation measures, outlined in the Project's SWAEMP (BIM-5200-PLA-0009), which continued to prove effective in controlling the mobilization of sediments. Refer to Section 7.5 for information about ESC measures implemented at the Project in 2025.

To ensure Baffinland's emergency response teams have the skills needed to safely and effectively respond to marine spills, annual marine spill response training was provided by external consultants at Milne Inlet, prior to the 2025 fuel resupply. During the annual training, the Project's Emergency Response Plan (ERP; BIM-5000-PLA-5000), Spill Contingency Plan (SCP; BAF-PH1-830-P16-0036) and the Milne Inlet Oil Pollution Emergency Plan (OPEP; BIM-5200-PLA-0028) and Oil Pollution Prevention Plan (OPPP; BIM-5200-PLA-0015) were reviewed. During the practical deployment exercises, the responders were provided with the opportunity to learn and then practice skills by responding to marine spill scenarios using the Milne Port resident spill response equipment. The findings related to the annual training sessions continue to be used to inform revisions to the OPEP, OPPP, ERP and SCP. Photos of the annual training exercise are included in the Milne Port Photo Journal, Appendix D.3.

6.2 HEALTH & SAFETY INCIDENTS

Under the Mine *Health and Safety Act*, several health and safety incidents were reported by the Project during 2025. Details of the incidents are presented in Table 6.3. All incidents were reported to the Worker's Safety and Compensation Commission as required by the Mine *Health and Safety Act*. To ensure compliance with the requirements of the Commercial Lease, Baffinland will continue to ensure reportable health and safety incidents, as defined in Section 5.2, a), vii of the Commercial Lease (QIA, 2013), are reported to the QIA in a timely manner following their occurrence in accordance with the Lease Operations Guide (QIA; 2018).

7 MONITORING

The following subsections discuss and summarize the results of the monitoring program outlined in Schedule I of the Type 'A' Water Licence, known as the Surveillance Network Program (SNP), as well as other relevant aquatic effects monitoring programs conducted at the Project in 2025 (NWB, 2025).

Schedule I of the Type 'A' Water Licence 2AM-MRY2540 (NWB, 2025) distinguishes surface water monitoring stations downstream of Project infrastructure as Verification Monitoring Program locations. As per Schedule I, monitoring parameters and locations under the Verification Monitoring Program are internal to Baffinland and the program is to be carried out to provide water quality data for operational and management purposes and to inform and support adaptive management measures, where necessary.

In 2024, Baffinland included a request for approval for proposed changes to the SNP program in the 2024 QIA and NWB Annual Report for Operations (Baffinland, 2025b) to relocate the MS-11 SNP monitoring station and remove one (1) SNP station ID (MS-C-F) in 2025 due to the planned mitigation measures at the KM 105 Facility and the monitoring station being within the Facility. In 2025, to support the new water management infrastructure within the KM 105 valley and improvements to monitoring capabilities and treatment capacity, MS-11 was relocated (as per the modification request submitted in 2024) to the proposed new monitoring location downstream of the KM 105 valley water management infrastructure. Under Schedule I of the Type 'A' Water Licence renewal (2AM-MRY2540; 2025), surface water monitoring station MS-C-F is a monitoring station under the Verification Monitoring Program.

In 2025, Baffinland is requesting the addition of one (1) monitoring station to Schedule I of the Type 'A' Water Licence (MS-12) to represent a proposed Final Discharge Point (FDP) to monitor discharge of clean snowmelt and stormwater collected within the Mine Pit footprint at the Mary River Mine Site. Water collected from sumps within the Mine Pit is normally pumped via pipeline to the WRF Storage Pond (MS-08) for discharge. However, in anticipation of higher than usual snowfall in 2026 and associated increases in snowmelt volumes reporting to MS-08, Baffinland is proposing to segregate Mine Pit sump water suitable for direct discharge and convey it via a dedicated pipeline. Appendix E.12 includes an application for the additional SNP station proposed.

7.1 SEWAGE DISPOSAL

Sewage generated and managed by the Project in 2025 was managed as described in the Project's FWSSWMP (BIM-5200-PLA-0022) and in accordance with the Type 'A' Water Licence (Part F, Items 17- 18; NWB, 2025).

During 2025, sewage generated from Project sites was directed to the Project STPs located at Milne Port (MP-01, MP-01B) and the Mine Site (MS-01, MS-01B). Mine Site STP MS-01 was shut-down in late December 2024 and remained shut-down in 2025 as sufficient treatment capacity for sewage wastes generated at the Mine Site was achieved via STP MS-01B. Treated sewage effluent was discharged to Mary River (freshwater) and Milne Inlet (ocean) in accordance with applicable effluent discharge criteria outlined in the Type 'A' Water Licence (NWB, 2025). Figure 3 and Figure 5 show the locations of the Milne

Port and Mine Site STPs, PWSPs and approved discharge points. In 2025, there were no exceedances of the effluent discharge criteria for treated sewage effluent generated by Project operations.

There were three (3) instances of untreated sewage released from containment in 2025 resulting in reportable spills:

- On February 1, an overflow from the Milne Port South Maintenance Shop sewage lift station occurred. Upon investigation, pump and valves maintenance were contributing factors. Upon discovery, the station was emptied immediately to prevent further release and repaired. An inspection of all Project lift stations was subsequently completed with a focus on visual alarms and automatic shut-off system functionality when high levels within the lift stations are reached. Scheduling and training optimisations were also prioritised from the investigation.
- On March 29, an overflow of the MSC laundry room lift station occurred when the amperage overload breaker for the low-level pump tripped, rendering the pump non-operational. Further investigation revealed a crack in the lift station tank and pump maintenance contributed to the release. Immediate corrective actions implemented following the spill included cleaning and reactivating the pumps, as well as relocating the pump floats to a lower level to prevent fluid from rising to the height of the crack, as an interim measure until the tank was subsequently replaced with a new unit featuring an access port for a vacuum truck operator to remove silt and debris.
- On July 30, an overflow from an MSC lift station tank occurred when sewage sludge accumulated around pump components inside the lift station, preventing the lift station pumps from engaging when the high level was reached as per the design. The pump intake of one of the affected lift station pumps was manually cleared and the pump was engaged to drain the tank and prevent any further flow from the lift station. Further accumulated sludge material was removed from around the affected pump components inside the lift station, and the lift station pumps were tested and reengaged, resuming lift station operation.

Further work is planned to schedule removal of MSC and Sailiivik Camp lift station sludge on a routine schedule as part of the Operators' workflow in the PM Plan for the Project's wastewater treatment facilities. Until that is fully implemented, inspections will continue to be performed to identify when each station requires cleaning. MSC lift stations are also now integrated into the PI system dashboard for real-time remote monitoring by Security and Operations.

These events were reported by Baffinland to relevant regulators and documented in NT-NU Spill Report No. 2025-091, No. 2025-145 and No. 2025-309, respectively. Copies of the original and follow-up spill reports for the events re provided in Appendix E.8.3 and provide additional details on the releases and the corrective actions taken by Baffinland. The status of the associated corrective actions is summarized in Table 6.2.

Table 5.1 provides the daily, monthly and annual quantities of treated sewage effluent discharged to the receiving environment in 2025. Table 7.2 (7.2.1, 7.2.2) and Table 7.3 (7.3.1) provide the effluent quality

monitoring results for treated sewage effluents discharged from Project STPs to the receiving environment during 2025.

7.1.1 Mine Site PWSP Effluent Discharge to Sheardown Lake NW

In 2025, Mine Site PWSP (MS MRY 04A, B, C) effluent was managed via re-treatment through the Sailiivik STP (MS-01B), and pond-to-pond transfer strategies if required, in accordance with Baffinland's PWSP Effluent Discharge Plan provided in the Project's FWSSWMP (BIM-5200-PLA-0022), to ensure adequate freeboard was maintained at Mine Site PWSPs; therefore, no wastewater was discharged from the Mine Site PWSPs to Sheardown Lake NW catchment in 2025. Baffinland continues to monitor PWSPs to ensure sufficient freeboard levels are maintained.

7.1.2 Milne Port PWSP Effluent Discharge to Milne Inlet

In 2025, Milne Port PWSP (MP-01A) effluent was managed via re-treatment through the PSC STP (MP-01), in accordance with Baffinland's PWSP Effluent Discharge Plan provided in the Project's FWSSWMP (BIM-5200-PLA-0022), to ensure adequate freeboard was maintained; therefore, no wastewater was discharged from PWSP MP-01A to Milne Inlet in 2025. Baffinland continues to monitor PWSPs to ensure sufficient freeboard levels are maintained.

7.2 STORMWATER FROM CONTAINMENT AREAS

During 2025, stormwater retained within containment areas associated with the Project's bulk fuel storage facilities (MP-03, MS-03, MS-03B), hazardous materials storage berms (HWBs), and landfarm facilities (MP-04/MP-04A, MS-05) was analysed in accordance with the Type 'A' Water Licence (Part F, Item 9; NWB, 2025), treated if required using the mobile OWTS, and discharged to the receiving environment as required.

Stormwater from the Milne Port Bulk Fuel Storage Facility (MP-03) was discharged to the Milne Inlet receiving environment from June 17-21 and from July 22-23, 2025. Stormwater discharge samples were collected and submitted to an external laboratory to be analysed and compared to the applicable water quality discharge criteria stipulated in the Type 'A' Water Licence (Part F, item 21, NWB, 2025. Table 5.3 provides the daily, monthly and annual quantities of stormwater discharged from the Milne Port Bulk Fuel Storage Facility in 2025. Table 7.2.3 presents the water quality results for the 2025 storm water discharge from MP-03. There were no exceedances of the applicable water quality discharge criteria during the 2025 discharge from MP-03.

Stormwater from the Milne Port Landfarm Facility (MP-04) was discharged periodically to the receiving environment from August 14 to August 26, 2025. Stormwater discharge samples were collected as stipulated by the conditions outlined in Schedule I of the Type 'A' Water Licence (NWB, 2025) and submitted to an external laboratory to be analysed and demonstrated the storm water was suitable for discharge to the receiving environment. Stormwater was not discharged from the Milne Port Contaminated Snow Containment Berm (MP-04A) in 2025. Table 5.3 provides the daily, monthly and annual quantities of storm water discharged from the Milne Port Landfarm Facility in 2025. Table 7.2.4 presents the water quality results for the 2025 storm water discharge from MP-04.

Storm water from the Mine Site Bulk Fuel Storage Facility MS-03 was discharged to the receiving environment periodically between August 15 to 22, 2025. Storm water discharge also occurred from Mine Site Bulk Fuel Storage Facility MS-03B to the receiving environment in 2025, on July 29 and 30. Storm water discharge grab samples were collected from MS-03 and MS-03B and submitted to an external laboratory to be analysed and demonstrated to be compliant with the applicable water quality discharge criteria stipulated in the Type 'A' Water Licence (Part F, Item 21, NWB, 2025). Table 5.3 provides the daily, monthly and annual quantities of stormwater discharged from the Mine Site Bulk Fuel Storage Facilities in 2025. Table 7.3.2 and Table 7.3.3 present the water quality results for the 2025 storm water discharge from MS-03 and MS-03B, respectively. There were no exceedances of the applicable water quality discharge criteria during the 2025 discharges from MS-03 and MS-03B.

Treated water from the Mine Site Hazardous Waste and Materials Containment Berm MS-HWB-07 (effluent monitoring station MS-MRY-06) was discharged to the receiving environment between June 7 and June 25. Stormwater discharge samples were collected at MS-MRY-06 and submitted to an external laboratory to be analyzed and compared to the applicable water quality discharge criteria outlined in the Type 'A' Water License (Part F, Item 21, NWB, 2025). Mine Site Landfarm Facility (MS-05) was also discharged in 2025, between September 1 and 2. Table 7.3.9 and Table 7.3.4 present the water quality results for the water discharged from MS-MRY-06 and MS-05, respectively. There were no exceedances of applicable water quality discharge criteria during the 2025 discharges from MS-MRY-06 and MS-05.

Monitoring locations and facilities associated with bulk fuel storage, HWBs, and the landfarms at Milne Port and the Mine Site are presented in Figure 3 and Figure 5, respectively, and in Table 7.1.

7.3 SURFACE WATER RUNOFF AND SEEPAGE

In accordance with the terms of the Type 'A' Water Licence (Part I; NWB, 2025), surface run-off/seepage in facilities designed to contain, withhold, divert and retain water or wastes were monitored during periods of flow and after significant precipitation events. In accordance with the terms of the Type 'A' Water Licence, Schedule I, active monitoring stations were monitored during periods of flow and for the required parameters to protect receiving waters from potential Project impacts (NWB, 2025). A summary of the monitoring stations and 2025 monitoring results is provided in the subsections below.

Monitoring of surface water at select crossings along the Tote Road in accordance with the Project's Tote Road Monitoring Program (TRMP) was also conducted during 2025 and is summarized in Section 7.3.8 below. Additional monitoring associated with surface run-off water from snow stockpiles, which characterizes the water quality of several Mine Site and Tote Road tributaries and drainages during the elevated runoff flows of the freshet period, is also summarized below in Section 7.3.9.

Monitoring locations and associated facilities at Milne Port, along the Tote Road, and at the Mine Site are presented in Figure 3, Figure 4, and Figure 5, respectively, and in Table 7.1.

7.3.1 Milne Port Ore Stockpile Facility

Monitoring stations MP-05 and MP-06 under Schedule I of the Type 'A' Water Licence (NWB, 2025) represent the east and west surface water management ponds, respectively, that collect surface water

runoff from the stockpile pad associated with the Milne Port Ore Stockpile Facility (refer to Figure 3). Surface water runoff from the pad is directed to the ponds by a network of ditches along the pad's perimeter.

During 2025, retained stormwater within the west Ore Stockpile Pond (MP-06) was actively discharged to Milne Inlet. During discharge, water quality monitoring of the effluent discharged was conducted as stipulated by the conditions outlined by Schedule I of the Type 'A' Water Licence. No effluent was discharged directly from the east Ore Stockpile Pond (MP-05) in 2025; effluent from MP-05 was transferred to MP-06, then discharged, to provide additional settling time.

Direct pond-to-pond transfers via non-rigid hose and pumps also continued to take place between Pond 3, located along the west perimeter of the Ore Pad, and MP-06.

Volumes of effluent discharged from the west (MP-06) pond in 2025 are presented in Table 5.4. Water quality monitoring results for the 2025 discharge are provided in Table 7.2.5.

7.3.2 Mine Site Landfill Facility

Monitoring stations MS-MRY-13A and MS-MRY-13B are Verification Monitoring Program locations under Schedule I of Type 'A' Water Licence 2AM-MRY-2540 for monitoring surface water drainage downstream of the Landfill Facility at the Mine Site (NWB, 2025). In 2025, monitoring at these verification monitoring locations was conducted to provide water quality data for operational and management purposes and to inform and support adaptive management, where necessary. Verification monitoring at surface water drainage locations downstream of the Landfill Facility in 2025 did not identify the need for adaptive management responses; however, drainage improvements were completed with diversion berms erected on the East side of the Landfill to divert surface water from Facility. The locations of Landfill Facility verification monitoring stations MS-MRY-13A and MS-MRY-13B are shown in Figure 5 and provided in Table 7.1.

Surface flow volumes continued to be monitored at MS-MRY-13A in 2025 using an existing weir and a pressure transducer logger installed in June 2025. Daily surface flows at MS-MRY-13A during 2025 is presented in Appendix E.3. Sampling was completed at monitoring station MS-MRY-13A throughout the open-water season when flowing conditions were present.

7.3.3 Mine Site Waste Rock Facility

Monitoring station MS-08 under Schedule I of the Type 'A' Water Licence (NWB, 2025) represents the surface water management pond (WRF Pond) that collects surface water runoff from the WRF's footprint. Surface water runoff from the WRF's footprint is directed to the WRF Pond by a series of ditches that run along the WRF's perimeter.

Baffinland continued to operate a dedicated Water Treatment Plant (WTP) at the WRF to treat surface water runoff retained by the WRF Pond when necessary, in 2025. The WRF WTP was approved under Water Licence Modification No. 7 (NWB, 2018) and uses a combination of coagulation, pH adjustment, precipitation, flocculation and filtration to ensure effluent discharged from the WRF Pond meets the

applicable water quality effluent criteria stipulated by the Type 'A' Water Licence (Part F, Item 23, Table 10.1, NWB, 2025) and Metal and Diamond Mining Effluent Regulations (Canada, 2002). A full description of the WRF WTP treatment processes is provided in the Project's FWSSWMP (BIM-5200-PLA-0022).

Beginning in June 2025, controlled discharges of effluent from the WRF Pond commenced. During periods of discharge, water quality monitoring was conducted to ensure compliance with applicable water quality discharge criteria stipulated in the water licence (NWB, 2025) and the MDMER (Canada, 2002). Water quality of the WRF Pond (MS-08) was found to be compliant with all applicable Type 'A' Water Licence water quality effluent criteria in 2025. The results of sampling completed to satisfy the MDMER requirements are detailed in Baffinland's 2025 MDMER Annual Effluent Monitoring Report for the Mine Site in Appendix E.14.

Controlled effluent discharges from the WRF in 2025 involved pumping retained surface water runoff from the WRF Pond through the WRF WTP and releasing the treated effluent at an established discharge location which discharges over land within the catchment of Mary River Tributary-F.

During periods of effluent discharge, the water quality of effluent was monitored at various stages of the WRF WTP by dedicated water treatment operators to ensure the plant was operating as designed and that treatment processes were achieving the target effluent quality. The WRF WTP operators also monitored any direct discharge from the WRF Pond through the Final Discharge Point (FDP) to ensure the water quality was compliant with effluent discharge criteria. The WRF continues to be routinely monitored to ensure non-contact water does not enter the facility.

One (1) reportable spill incident associated with the WRF occurred during 2025. On June 20, 2025, seepage of snowmelt water within the WRF West perimeter ditch occurred through a defined location of the ditch to the tundra plateau adjacent to the WRF. In response to the seepage and in accordance with Baffinland's MDMER Emergency Response Plan, the perimeter ditch was cleared of residual recently accumulated snow to reduce the water elevation in the ditch and restore the intended water flow along the ditch, and an impermeable repair patch was installed which fully stopped the seepage. The ditch clearing and repairs were completed without delay. Further inspection of WRF access roads and ditch gradients was completed to identify any similar settlement-related vulnerabilities, which were subsequently repaired.

The June 20254 event was reported by Baffinland to relevant regulators and is documented in the NT-NU Spill Report No. 2025-264. Copies of the original and follow-up spill reports for the event are provided in Appendix E.8.3 and provide additional details on the event and the corrective actions taken by Baffinland. The status of the associated corrective actions is summarized in Table 6.2.

Volumes and water quality results associated with the 2025 controlled effluent discharges from the WRF (MS-08) are provided in Table 5.4 and Table 7.3.7, respectively. Locations of the WRF effluent monitoring and discharge points are shown in Figure 5 and provided in Table 7.1.

7.3.4 Mine Site Crusher Facility

Monitoring station MS-06 under Schedule I of the Type 'A' Water Licence (NWB, 2025) represents the surface water management pond (Crusher Facility Pond) that collects surface water runoff from the Mine

Site Crusher Facility's footprint. Surface water runoff from the Crusher Facility's footprint continues to be directed to the Crusher Facility Pond by a series of pumps and hoses, due to identified integrity issues with the perimeter ditch network.

Periodic controlled discharges of the treated effluent from the Crusher Facility Pond occurred between July 16, 2025 to July 29, 2025. Controlled effluent discharges from the Crusher Facility in 2025 involved pumping retained surface water runoff from the Crusher Facility Pond through a direct-discharge pipeline shared with the Mine Site STPs and releasing the effluent at an approved discharge point near the Mary River (Figure 5). Following a reportable incident in July, 2025, a dedicated and larger discharge line was installed for the MS-06 pond, to the existing outfall location, to alleviate infrastructure limitations associated with use of the direct-discharge pipeline shared with the Mine Site SPTs. During periods of discharge, water quality monitoring was conducted to ensure compliance with the applicable water quality discharge criteria outlined in the MDMER (Canada, 2002) and the Type 'A' Water Licence (NWB, 2025). No exceedances of the applicable water quality discharge criteria were observed during the 2025 CF effluent discharges. The results of sampling completed to satisfy the MDMER (Canada, 2002) requirements are detailed in Baffinland's 2025 MDMER Annual Effluent Monitoring Report for the Mine Site in Appendix E.14.

Volumes and water quality results associated with the 2025 controlled effluent discharges from the CF (MS-06) are provided in Table 5.4 and Table 7.3.5, respectively. Locations of the CF effluent monitoring and discharge points are shown in Figure 5 and provided in Table 7.1.

Interim contingency measures including diversion, containment structures and pumping strategies implemented in accordance with Part H Item 2 and 8 of the Type 'A' Water Licence (NWB, 2025) and consistent with the Project's FWSSWMP (BIM-5200-PLA-0022) and the MDMER Emergency Response Plan (BIM-5000-PLA-0003), remained in place in 2025 to manage water at the CF. The interim measures including construction and maintenance of an embankment berm were implemented to address concerns regarding the integrity of the perimeter ditch network identified in 2019 and following the subsequent observation of seepage water in 2020 and 2021. The measures continue to be inspected on a regular basis and are functioning as intended to convey any/all water into MS-06. Contact water will continue to be captured and conveyed to the surface water management pond, when necessary, via the interim measures to prevent potential seepage from the perimeter ditch network to the tundra.

One (1) reportable spill incident associated with the Crusher Facility occurred during 2025. On July 16, inflows to the Crusher Facility Pond (MS-06) exceeded the discharge capacity of the infrastructure, following a prolonged rainfall event, resulting in the slow release of compliant water over the lined emergency spillway to the rip rap below the spillway. To manage rising water levels, approximately 302 m3 of effluent was transferred from the MS-06 Pond to the Ore Stockpile Facility Sedimentation Pond (MS-07) to mitigate freeboard conditions, in addition to controlled discharge initiated after initial field readings confirmed the water was compliant with TSS criteria. The pond level was subsequently reduced to the lowest practicable level through continued discharge through the FDP and water transfers. Investigation determined that a significant contributing factor of the release was that the inflow of water

to the pond exceeded the discharge pumping capacity of existing infrastructure. A dedicated and larger discharge line was installed for the MS-06 pond, to the existing outfall location, and the existing pump was upgraded with a larger capacity diesel-powered pump to address the infrastructure limitations that contributed to the event.

The July 2025 event was reported by Baffinland to relevant regulators and is documented in the NT-NU Spill Report No. 2025-294. Copies of the original and follow-up spill reports for the exceedance are provided in Appendix E.8.3 and provide additional details on the exceedances and the corrective actions taken by Baffinland. The status of the associated corrective actions is summarized in Table 6.2.

7.3.5 KM 106 Run-of-Mine (ROM) Ore Stockpile Facility

Monitoring station MS-07 under Schedule I of the Type 'A' Water Licence (NWB, 2025) represents the surface water management pond that collects surface water runoff from the Mine Site KM 106 Run of Mine (ROM) Ore Stockpile pad (KM 106 Ore Stockpile). Surface water runoff from the KM 106 Ore Stockpile is directed to the KM 106 Pond by a network of ditches along the KM 106 Ore Stockpile's perimeter with pumps and hoses.

Periodic controlled discharges of the treated effluent from the KM 106 Pond occurred during July and September 2025. Controlled discharges of the treated effluent from the KM 106 Pond in 2025 involved pumping retained surface water runoff from the KM 106 Pond at an approved discharge point near the Mary River (Figure 5). During periods of discharge, water quality monitoring was conducted to ensure compliance with the applicable water quality discharge criteria outlined in the MDMER (Canada, 2002) and the Type 'A' Water Licence (NWB, 2025). No exceedances of the applicable water quality discharge criteria were observed during the 2025 KM 106 Pond effluent discharges. The results of sampling completed to satisfy MDMER (Canada, 2002) requirements are detailed in Baffinland's 2025 MDMER Annual Effluent Monitoring Report for the Mine Site in Appendix E.14.

Volumes and water quality results associated with the 2025 controlled effluent discharges from the KM 106 ROM Ore Stockpile Facility (MS-07) are provided in Table 5.4 and Table 7.3.6, respectively. Locations of the KM 106 ROM Ore Stockpile Facility effluent monitoring and discharge points are shown in Figure 5 and provided in Table 7.1.

One (1) reportable spill incident associated with the KM106 Ore Stockpile occurred during 2025. On June 6, water from the KM 106 Ore Stockpile was observed bypassing the diversion berm and seeping onto the facility road in between the pond and stockpile. Minor amounts of pooling water remaining from freshet flows and thawing ground resulted in saturated diversion berm conditions. Uneven gradient along the diversion berm resultant of thawing conditions allowed water to pool near the diversion berm, which contributed to the event. In response to the seepage and in accordance with Baffinland's MDMER Emergency Response Plan (BIM-5000-PLA-0003), the water migrating on the road was intercepted and redirected to a seepage collection swale/ditch and an existing containment sump. Upon further inspection the release stayed within the facility and road footprint and did not necessitate the spill report. Recovered water was subsequently transferred by pump from the containment sump to the KM 106 Ore Stockpile Pond. Diversion berm gradient was resurfaced to ensure proper run-off of water to the lined spillway of

the KM 106 Ore Stockpile Pond. In addition, the ditch and sump were both deepened, in lieu of raising the road/installing a pipe, to increase efficiency of water conveyance and capacity when transferring of water is required. No further seepage was observed from the diversion berm, and the secondary seepage collection ditch and containment sump will remain in place to recover potential seepage from the diversion berm. Both features continue to be inspected on a regular basis.

The June, 2025 event was reported by Baffinland to relevant regulators and is documented in the NT-NU Spill Report No. 2025-248. Copies of the original and follow-up spill reports for the exceedance are provided in Appendix E.8.3 and provide additional details on the exceedances and the corrective actions taken by Baffinland. The status of the associated corrective actions is summarized in Table 6.2.

No stability or seepage concerns were observed with the KM 106 Ore Stockpile Pond or the facility's perimeter berm during the annual geotechnical inspections in either 2024 or 2025 (see Appendix C.2). Regular inspections of the diversion berm will continue to be conducted and ongoing maintenance completed as necessary to ensure all contact water continues to be captured and conveyed to the surface water management pond. As noted above, the temporary containment sump (constructed in 2021 to collect seepage, prior to permanent corrections to the perimeter ditch network) remains in place in case short-term interception and recovery of seepage is required in the future.

7.3.6 Mine Site KM 105 Surface Water Management Pond

Monitoring station MS-11 under Schedule I of the Type 'A' Water Licence (NWB, 2025), which became active in 2022, represents the surface water management infrastructure, at KM 105, that collects surface water runoff from Deposit No. 1. Surface water runoff is directed to the facility from the ditch that runs along the Mine Haul Road.

The KM 105 Facility was constructed as a key component of Baffinland's efforts to improve water management in accordance with the Mine Site Water Management Plan submitted under Modification No. 13 (NWB, 2021). This modification aimed to address previous sedimentation issues observed at Deposit 1. Modification No. 13 was an adaptive management measure supported by a significant capital investment by Baffinland to better manage runoff from the Deposit, Mine Haul Road and surrounding hillside. Construction of the KM 105 Facility was completed in June 2022, and the facility was immediately commissioned to manage freshet runoff.

Design parameters for the KM 105 Facility were intended to achieve adequate settling of TSS to meet MDMER (2002) and Water Licence discharge criteria (NWB, 2025) following three (3) days of retention. However, the KM 105 Facility design has not performed as expected. In response, Baffinland undertook a comprehensive evaluation of the KM 105 facilities performance. This involved engaging with third-party engineers and water treatment experts to identify and assess potential mitigations and improvements. These consultations previously focused on identifying remediation measures for the dam structure and exploring strategies to enhance settling efficiency and improve water quality prior to discharge, to ensure compliance with regulatory criteria. In early 2025, it was determined that a passive flow-through multi-faceted water treatment system would enhance effectiveness, rather than relying largely on the settling capacity of the infrastructure.

2025 Operations and Mitigations

Baffinland employed a new treatment strategy at the KM 105 Facility and constructed new water management infrastructure following adaptive management response summarised within the KM 105 End of Year Summary Report (see Appendix E.8.3). To support new water management infrastructure within the KM 105 valley and improvements to monitoring capabilities and treatment capacity, MS-11 was relocated (as submitted within the 2024 Annual report modification request) to the proposed new monitoring location downstream of the KM 105 valley water management infrastructure. In addition, engineering remains ongoing for future water management infrastructure within the Facility. During 2025, additional filter berms were constructed and armouring and silt curtains was placed within designated priority areas and water bodies.

One (1) exceedance of water licence criteria occurred in 2025: Total Suspended Solids (TSS) was slightly above the water licence criteria in a sample collected at the KM 105 Facility (MS-11) which operates as a continuous flow through facility. Follow-up sampling documented that TSS levels quickly returned to acceptable levels, after implementing a combination of new and previously installed treatment measures, and remained compliant through to the end of the year when flow was present. Baffinland continues to assess and implement measures at the Facility.*2026 Water Management Planning*

Baffinland continued to work with third-party specialist engineers during 2026 to evaluate feasible water management strategies for surface water flows reporting to the KM 105 Facility. The current design direction emphasizes a passive, flow-through treatment approach that can be supplemented, as needed, with flocculant dosing and filter berms. This approach is intended to maintain through-flow while slowing velocities and promoting the settling and filtration of suspended particles, thereby reducing the potential for downstream hydrograph alteration and associated effects in low-order fish-bearing reaches of the SLDT-1 system.

This approach is considered appropriate based on 2025 performance, during which only one TSS exceedance was recorded, and that exceedance was marginal and attributed to dust-impacted snowmelt rather than effluent travelling through the Facility. Baffinland will continue to reinforce existing mitigations with targeted infrastructure improvements intended to reliably maintain effluent quality below applicable limits.

Key design additions under development during 2026 include an engineered filter berm within the KM 105 Facility and an engineered final discharge point (FDP) to provide a single controlled discharge path for representative sampling and flow measurement. Engineering for these additions remains ongoing, and construction timing will depend on completion of design and regulatory review. The proposed approach aligns with, and in some areas is intended to exceed, relevant International Erosion Control Association principles and guidelines.

7.3.7 Deposit No. 1

Monitoring stations MS-MRY-09, MS-MRY-10, MS-MRY-11 and MP-MRY-12 under the original Schedule I of the Type 'A' Water Licence represented surface flow/seepage monitoring locations associated with the 2008 Bulk Sample Program's Deposit No. 1 Pit and associated ore stockpiling/processing locations at the Mine Site and Milne Port (NWB, 2015). As a result of continued development and infrastructure changes at the Project, these monitoring stations have become inactive. The 2018 Annual Report included an application to the NWB to discontinue and/or relocate these monitoring stations to reflect Project infrastructure at the time. On September 11, 2020, the NWB accepted the proposed changes, issuing the relocations of stations MS-MRY-09, MS-MRY-10 and removal of stations MS-MRY-11 and MP-MRY-12 in Table 13 Monitoring Program: Milne Port Site and Table 14 Monitoring Program: Mary River Mine Site within Schedule I (NWB, 2020). The 2021 QIA and NWB Annual Report for Operations (Baffinland, 2022a) included an application to the NWB to discontinue monitoring station MS-MRY-10 and remove the monitoring station from Schedule I. On December 12, 2022, the NWB accepted the proposed change, removing station MS-MRY-10 from Table 14 Monitoring Program – Mary River Mine Site within Schedule I (NWB, 2022). Through the renewal of the Type 'A' Water Licence, MS-MRY-09 was removed from Table 13 Monitoring Program: Mary River Mine Site within Schedule I of Type 'A' Water Licence 2AM-MRY-2540 (NWB, 2025) to reflect current site conditions. Following removal of MS-MRY-09 from Schedule I, sampling at MS-MRY-09 was discontinued under the SNP program. A Modification request to redefine MS-12 is being submitted with the 2025 Annual Report. MS-12 is the proposed FDP to monitor discharge of clean snowmelt and stormwater collected within the Mine Pit footprint at the Mary River Mine Site. Water collected from sumps within the Mine Pit is normally pumped via pipeline to the WRF Storage Pond (MS-08) for discharge. In anticipation of higher than usual snowfall in 2026 and associated increases in snowmelt volumes reporting to MS-08, BIM is proposing to segregate Mine Pit sump water suitable for direct discharge and convey it via a dedicated pipeline, subsequently traveling over land to Mary River Tributary F and ultimately to the designated receiving environment of Mary River, thereby reducing hydraulic loading on MS-08.

7.3.8 Tote Road Monitoring Program

During 2025, monitoring was conducted during open-water along the Tote Road to monitor the quality of surface water flows at select fish-bearing watercourse crossings (culverts, bridges), in accordance with Appendix D Tote Road Monitoring Program (TRMP) of the Roads Management Plan (BAF-PH1-830-P16-0023). Watercourse crossings monitored under the TRMP, were selected to provide geographically representative samples of water crossings for each watershed intersected by the Tote Road (Phillips Creek, Ravn River, Mary River), as well as proximity to snow stockpile locations and locations of historical sedimentation events. Upstream and downstream water quality was monitored for pH, TSS, Total Dissolved Solids (TDS) and turbidity at twenty (20) locations along the Tote Road.

The objective of the TRMP is to identify potential Project related impacts to surface water as a result of operation and maintenance of the Tote Road throughout freshet and the remainder of the flowing water season, by comparing upstream of the Tote Road TSS concentrations to downstream of the Tote Road TSS

concentrations at defined distances and sampling intervals. A potential Project related change is defined as a greater than 50 mg/L increase in TSS concentrations in the downstream sample when upstream concentrations are less than 250 mg/L. When concentrations are greater than 250 mg/L in the upstream sample, a potential Project related change is defined as a greater than 20% increase in TSS concentrations in the downstream sample. In 2025, at the request of ECCC, Baffinland conducted a data analysis which evaluated the Roads Management Plan TRMP criteria incorporating natural variability data available for the Tote Road into the analyse. Following the investigation, Baffinland agrees to amend the guidelines with the Roads Management Plan to CCME TSS criteria for identifying potential Project-related change.

In 2025, a total of 328 water quality samples were collected, of which no sampling events reported Project-related impacts to surface water, as a result of the operation and maintenance of the Tote Road. The implementation of erosion and sediment control measures were therefore not required in response to water quality at the TRMP locations, regardless, ESC measures were installed at many of the crossings evaluated as detailed in Appendix C.3 of the 2025 DFO Tote Road Report.

Water quality results for the 2025 TRMP monitoring are presented in Table 7.4 (7.4.1 through 7.4.40).

Monitoring and maintenance of erosion and sediment control measures continued throughout the open-water season. A full summary of ESC measures implemented in 2025 along the Tote Road at or near fish bearing crossings, including photos, is provided in the 2025 DFO Tote Road Report in Appendix C.3.

7.3.9 Snow Stockpile Monitoring

Surface water runoff from melting snow stockpile locations was monitored at the Project Mine Site and along the Tote Road, as per the requirements of the Surface Water and Aquatic Ecosystem Management Plan (SWAEMP; BIM-5200-PLA-0009). Monitoring locations are established down gradient of individual snow stockpiles and are re-assessed and re-located as necessary, to ensure representative monitoring of the receiving environment. Grab samples were collected weekly at each monitoring location from the on-set of Freshet (late-May), until snowmelt/run-off was no longer occurring or remnant stockpiles re-froze. Collected samples were submitted to an external lab for analysis. During freshet, elevated but short duration sediment loading is typical of stockpile run-off. In accordance with Baffinland's SWAEMP (BIM-5200-PLA-0009), erosion and sediment control measures, such as geotextile fabrics, coir logs, silt fences, spring berms, and embankment armoring, were installed and maintained where necessary, in preparation for potential sediment laden runoff from the snow stockpile areas.

Snow stockpiles at Milne Port are not individually monitored, as run-off from these stockpiles is captured by site water management systems and monitored under the SNP Program.

In 2025, a total of twelve (12) samples were collected from snow stockpile monitoring locations at the Mine Site which did not identify the need for adaptive management responses; therefore, no changes to snow stockpile management practices or operations were implemented at the Mine Site in 2025, regardless ESC measures were implemented downgradient of select stockpiles to mitigate the potential for sediment movement. Water quality monitoring results for the Mine Site Snow Stockpiles are presented in Tables 7.5.1 through 7.5.3.

A total of twenty-four (24) samples were collected from snow stockpile monitoring locations along the Tote Road which did not identify the need for adaptive management responses; therefore, no changes to snow stockpile management practices or operations were implemented at Tote Road snow stockpiles in 2025, however ESC measures were implemented downgradient of select stockpiles. There was no runoff noted from the snow stockpile at KM77 during routine weekly inspections, therefore, no sampling events were completed at monitoring station TR-SN-03. Water quality monitoring results for the Tote Road Snow Stockpiles, are presented in Tables 7.5.4 through 7.5.8.

7.3.10 Environmental Construction Monitoring

During 2025, surface water monitoring was conducted downstream of Project construction activities and analysed in accordance with the Type 'A' Water Licence (Part D, Item 14; NWB, 2025). All construction activities undertaken were constructed in compliance with the regulatory requirements outlined in the Type 'A' Water Licence (NWB, 2025), and the Commercial Lease (QIA, 2013). Where applicable, the *Fisheries Act* or various regulatory agencies require additional permitting, approvals or authorizations prior to construction activity commencing.

Environmental construction monitoring is carried out to ensure the construction works maintain compliance with applicable environmental regulatory requirements during pre-disturbance, construction and post-construction phases of the work. During open water, water quality monitoring is completed when active construction is in proximity to a watercourse or has potential to impact a watercourse. Post-construction water quality monitoring is completed during June, July and August of the first year of open-water following construction. Monitoring locations are identified at 50 m upstream, 50 m downstream and 100 m downstream of the construction area, and water quality samples are collected at 50 m upstream and 100 m downstream of the work area. Water quality is monitored for pH, TSS, and Total Dissolved Solids (TDS), comparing water quality upstream and downstream of the work area.

For the purposes of construction monitoring, a potential Project related change is defined as per Baffinland's Roads Management Plan (BIM-5200-PLA-0027).

The following general ESC measures are implemented during open water periods and periods of active road maintenance or construction activities as required, to prevent erosion and the potential deposition of sediment beyond the construction footprint:

- Tracking of heavy equipment outside of the construction footprint is prohibited and the footprint boundary is surveyed and staked, to ensure construction is completed in the designated area and does not encroach on nearby watercourses;
- Daily pre-use equipment inspections are completed, use of equipment that recently underwent Preventive Maintenance (PM), avoidance of over-greasing and wiping off of fuel staining from equipment;
- Spill response supplies are staged in the immediate work area;

- Re-fueling of equipment is completed at established equipment laydowns or facilities located greater than 31 meters from the high-water mark of the watercourse; and
- Installing ESC controls including silt fence, silt curtain, and coir logs and implementing ESC mitigation measures such as grading practices, in accordance with the Surface Water and Aquatic Ecosystem Management Plan (SWAEMP; BIM-5200-PLA-0009), to ensure sensitive habitat is protected from potential impacts of the construction.

7.3.10.1 Water Quality Results

During 2025, water quality monitoring confirmed no Project-related change occurred within downstream receiving waterbodies as a result of construction activities. Post water quality monitoring was completed at the following construction areas in 2025 and the results are presented in Table 7.6.1 to 7.6.2:

- CV-049 (KM 63.5): This culvert crossing washed out during the September 2024 rain event, requiring emergency re-construction. Post-construction monitoring was completed in June, July and August, 2025.
- CV-187 (KM 103): This culvert crossing is a fish-bearing crossing that was replaced in 2025 because it was blocked. Post-construction monitoring was completed in July and August, 2025 following completion of the culvert on June 29, 2025.
- CV-216 (KM 80.5) by-pass road construction in fish-bearing water: Pre-disturbance water quality monitoring was completed in September 2025 and will be presented in the construction summary report for the work as applicable. Frozen conditions precluded water sample collection during construction. Post-construction water quality will be completed at CV-216, during June, July and August of 2026.

7.4 SURFACE WATER RUNOFF DOWNSTREAM OF PROJECT AREAS AND QUARRIES

Monitoring stations MP-C-B, MP-C-H, MP-C-J, and MP-C-K at Milne Port and MS-C-A through MS-C-H at the Mine Site are Verification Monitoring Program locations under Schedule I of Type 'A' Water Licence 2AM-MRY-2540 (Part I, Item 23; NWB, 2025) for monitoring surface water downstream of the Project during construction phases. In 2025, monitoring at these verification monitoring locations was conducted to provide water quality data for operational and management purposes and to inform and support adaptive management, where necessary. Managing surface water drainage at the Project during freshet remains a challenge and in 2025 resulted in several instances where adaptive management responses were executed. The data generated from SNP stations allowed the Project to specific areas actions for adaptive management; reporting and guidelines for the stations are no longer applicable with the 2AM-MRY-2540 framework. Preventative and corrective implementation of sedimentation controls and mitigation measures, outlined in the Project's SWAEMP (BIM-5200-PLA-0009), continued to prove effective in controlling the mobilization of sediments. Verification surface water monitoring locations downstream of project areas are presented in Figure 3 and Figure 5, and in Table 7.1.

Erosion and sediment control measures implemented in 2025 to in response to potential erosion and sedimentation included:

- Installation of silt fencing, coir logs, spring berms and geotextile;
- Construction of rock check dams, filter berms, water diversion ditches and rock armouring of roadside embankments and ditches;
- Monitoring of snow stockpile run-off, clearing and steaming snow from culvert inlets/outlets prior to freshet, and sediment removal from ditches and ESC structures; and
- Adaptive management improvements at the KM 105 Facility summarized within the KM 105 End of Year summary, including construction of additional filter berms and armouring placed within designated priority areas and waterbodies.

Monitoring and maintenance of erosion and sediment control measures continued throughout the open-water season. A summary of ESC measures implemented in 2025 along the Tote Road, including photos, is provided in the 2025 DFO Tote Road Report in Appendix C.3. Baffinland also developed an Erosion and Sediment Control Awareness training in 2025 and completed its delivery to applicable staff, prior to freshet. A total of 127 personnel received the training.

In accordance to the terms of the Type 'A' Water Licence (Part I, Item 21; NWB, 2025), runoff and/or discharge water quality monitoring from borrow pits and rock Quarry areas was conducted during 2025.

2025 water quality monitoring results for stations MP-Q1-01 and MP-Q1-02, representing surface water runoff from developed quarries at Milne Port, are provided in Table 7.2. 2025 water quality monitoring for Mary River stations MQ-C-A, MQ-C-B and MQ-C-D representing surface water runoff from developed quarries are provided in Table 7.3. Monitoring locations downstream of developed quarries are presented in Figure 3 and Figure 5, and in Table 7.1.

Daily surface flow volumes were measured at or near most of the surface water monitoring locations in 2025 and are detailed in Appendix E.3.

Adaptive management and regulator feedback will continue to be applied at the Project to manage surface water runoff that has the potential to interact with Project areas.

7.5 NATURAL EROSION AND SEDIMENTATION

During the 2025 field season, natural sedimentation surveys were conducted by helicopter. Surveys focused on areas beyond, but in proximity to, the Project Lease Boundary, as well as undeveloped areas within the lease where conditions were observed by environmental staff. Helicopter surveys emphasized the identification of natural sedimentation events. These surveys were completed along the full length of the proposed Steensby Rail alignment, along the Mary River corridor, and in the Milne Port area. In addition, new erosion and sedimentation were observed upstream of the CV-111 culvert crossing along the Tote Road. Details of these observations are provided in the subsections below.

7.5.1 MARY RIVER

On June 25, 2025, a flight was conducted to determine if any sources of natural sedimentation were observable in the Mary River. No sources of natural sedimentation were discovered during this flight; therefore, no samples were collected.

Following the discovery of turbid backflow from Mary River into Sheardown Lake, two (2) flights were completed on July 13, 2025 to attempt to identify the sources of sediment. Turbid water from tributaries upstream of mine influence was observed flowing into the Mary River and Philips Creek through well-defined channels. Turbid water was seen backflowing from Mary River into Sheardown Lake NW, and visually altering water quality in the lake. Photos of this can be seen in Appendix D.1 (Photos 95-97).

On July 30, 2025, another reconnaissance flight was conducted, and water quality samples were collected at a site northeast of the Mine Site. The location was given the designation MS-NS-02. Laboratory analysis conducted by an external third party reported upstream and downstream TSS results of 4.4 mg/L and 7.2 mg/L, respectively. The location of MS-NS-02 is shown in Figure 11, and the corresponding water quality analytical results are presented in Table 7.10.

On August 25, 2025, a follow-up survey was conducted for the locations observed during the July 2025 flights. No natural sedimentation events were observed during this survey; therefore, no further samples were collected.

7.5.2 PROPOSED STEENSBY RAIL ALIGNMENT

Throughout the 2025 field season, three (3) aerial reconnaissance flights were conducted along the Steensby Rail alignment to identify cases of natural sedimentation. The first flight, conducted on June 28, 2025, identified two locations where sediment-laden water was observed interacting with watercourses.

The location designated as SR-NS-01, was sampled upstream and downstream of water flowing through an observed feature associated with natural freshet cycles and consequential erosion. Lab results indicated that TSS results upstream of the feature was 12.4, while the downstream sample results revealed 1410 mg/L. The second location identified on June 28 (SR-NS-02) was sampled the following day, during which naturally occurring erosion along the channel margin was observed, resulting in sand being conveyed into the stream. External lab results showed TSS levels upstream of the bank failure at 9.6, while the downstream value was reported to be 52.7 mg/L.

On July 30, 2025, the third flight over the Steensby Rail Alignment was conducted, during which a turbid stream was observed discharging into a southeast–northwest flowing river. This location was designated SR-NS-03. Samples were collected upstream and downstream of the source water body, with laboratory results indicating turbidity values of 5.90 NTU upstream and 23.0 NTU downstream. The locations of SR-NS-01, SR-NS-02, and SR-NS-03 are presented in Figure 11, and the corresponding analytical results are provided in Table 7.10.2.

7.5.3 TOTE ROAD

On July 13, while conducting an aerial survey near the H01 hydrology monitoring site, turbid water was observed flowing from a northeastern tributary into Philips Creek. Sediment was conveyed through a single defined channel, dispersing into multiple smaller channels as it approached Philips Creek (see Appendix D.1, Photo 98). Water quality samples were collected upstream and downstream of the point where sediment entered Philips Creek at location MS-NS-05. Laboratory analyses indicated TSS values of 2.1 and 67.8 mg/L upstream and downstream respectively. Sample locations are shown in Figure 11, and the corresponding water quality analytical results are presented in Table 7.10.1.

On July 19, environmental staff observed erosion and sediment deposition at CV-111 along the north embankment of the watercourse, at approximately 55 m and 70 m upstream of the Tote Road and Project influence (see Figure 12). Investigation of the plateau above the embankment identified slumping ground, evidence of prior over-land flooding, and the development of erosion channels leading to a depressed, water-logged area beyond Baffinland's commercial lease boundary. Additional observations of the eroded embankment completed on July 24 and August 4, indicated that erosion did not appear to have progressed since first identified. Silt fencing was installed on August 8 to deter sediment deposition into the watercourse however remains an area of focus.

7.5.4 MILNE PORT

While conducting an aerial photographic flight on June 26, 2025, environmental staff also assessed the area around Milne Port for evidence of natural sedimentation events. As no natural sedimentation was observed during the flight, no samples were collected.

7.6 AQUATIC EFFECTS MONITORING PLAN (AEMP)

The Aquatic Effects Monitoring Plan (AEMP) describes how monitoring of the aquatic environment will be undertaken at the Project. The AEMP was identified as a follow-up monitoring program in the Final Environmental Impact Statement (FEIS; Baffinland, 2012) and is prescribed by the Type 'A' Water Licence (NWB, 2025). The AEMP, specifically, is a monitoring program designed to:

- Detect the short-term and long-term effects of the Project's activities on the surrounding aquatic environment resulting from the Project;
- Provide data to evaluate the accuracy of impact predictions;
- Identify mitigation measures to avert or reduce unforeseen environmental effects; and
- Provide data to assess the effectiveness of mitigation measures.

The AEMP focuses on the key potential impacts to freshwater environment valued ecosystems components (VECs), as identified in the FEIS (Baffinland, 2012) and Addendum for the Early Revenue Phase (ERP; Baffinland, 2013). The freshwater VECs include water quantity, water and sediment quality, and freshwater biota and fish habitat. The AEMP has been structured to serve as an overarching 'umbrella' that conceptually provides an opportunity to integrate results of individually monitored but related aquatic monitoring programs, and includes the evaluation of Project-related influences on chemical and biological conditions at mine-exposed waterbodies.

The following are the component studies that comprise the AEMP:

- Hydrometric Monitoring Program: assesses flow (water quantity) in several streams and rivers near Project sites. The 2025 study report is provided in Appendix E.9.1.
- Environmental Effects Monitoring (EEM) Program: as required under the MDMER (2002). The first biological EEM study for the Project, Phase 1, was conducted in August 2017 and submitted to Environment and Climate Change Canada (ECCC) in January 2018. The second biological EEM study for the Project, Phase 2, was conducted in August 2020 and submitted to ECCC in January 2021. The third biological EEM study for the Project, Phase 3, was completed in 2023; the subsequent interpretative report for the field program implemented in 2023 was submitted to ECCC in January 2024. The Study Design for the next (fourth) EEM biological study was submitted February 10th 2026, no later than six (6) months prior to implementing biological study field collections. The corresponding EEM Interpretative Report for the fourth biological study will be submitted to ECCC in January 2027.
- Core Receiving Environment Monitoring Program (CREMP): provides a basis for the evaluation of any mine-related influences on water quality, sediment quality, and/or biota (including phytoplankton, benthic invertebrates, and/or fish) within aquatic environments located near the Mine Site. The 2025 study report is provided as Appendix E.9.2.
- Targeted Studies:
  - Lake Sedimentation Monitoring Program: evaluates baseline and project-influenced lake sedimentation rates at Sheardown Lake NW. The 2025 study report is provided as Appendix E.9.3.
  - Dustfall Monitoring Program: evaluates total dustfall deposition in proximity to the Mine Site, Milne Port, and the Tote Road. The 2025 results are reported in the 2025 Terrestrial Annual Monitoring Report (TEAMR; EDI, 2026) and will be included in the 2025 Annual Report to the Nunavut Impact Review Board (NIRB). Results of the program are incorporated into evaluations within the CREMP report
  - Stream Diversion Barrier Study: an initial study evaluating the potential for fish barriers under natural conditions and due to Project-related stream diversions. This study was deferred due to the low impact anticipated by the reduced footprint of the Waste Rock Facility (WRF) during the ERP phase of the Project; however, as approved within the AEMP, Baffinland will initiate the Stream Diversion Barrier Study approximately one year prior to the start of the full production (rail) phase of the Project. To date the tributary, which this study was targeting has experienced increase in flow, not reductions, due to increased surface water flows resultant of Modification 13.

On November 8 and 9, 2017, Baffinland chaired the 2017 Freshwater Workshop in Iqaluit, Nunavut with regulators and stakeholders (ECCC, CIRNAC, Government of Nunavut [GN], NWB, QIA) to discuss the Project's freshwater monitoring programs and the proposed changes to the Project's CREMP, included in Revision 2 of the AEMP submitted to regulators in April 2016. Taking into account discussions and feedback received at the 2017 Freshwater Workshop, Baffinland resubmitted a modified Revision 2 of the AEMP to regulators and stakeholders through the Phase 2 Proposal water licence amendment (Baffinland;

2018), for review and approval. Additionally, in 2021 Baffinland submitted an updated application package through the water licence amendment process to various regulatory agencies for technical review and comment. Baffinland subsequently hosted a workshop in February 2022 to discuss any remaining outstanding technical comments. Baffinland updated the AEMP incorporating feedback from various regulators and QIA. That revision; revision 2, was included as an appendix in the 2021 QIA and NWB Annual Report for Operations submission. Further updates were subsequently completed to AEMP revision 2 to reflect the responses that Baffinland provided to comments from various regulators and QIA for the AEMP and related programs following the 2021 reporting year, and for inclusion of adaptive management mechanisms and Trigger Action Response Plan (TARP) tables relevant to the AEMP program. In 2023 and 2024, additional comments were received through intervener comments on the previous years' annual reports as well as through the technical hearing of the renewal process for the Type 'A' Water Licence (NWB, 2015). In 2025, the AEMP (Revision 2) was approved through the new licence and updated to Rev 3 to reflect commitments made during the technical review of the Application and Hearing Process, as required by the amended Type 'A' Water Licence (NWB, 2025). Revision 3 will submitted with the updated comments that have undergone review with the 2025 Annual Report.

Additionally, for the Dustfall Monitoring Program, to satisfy Schedule B, Item 18 of Type 'A' Water Licence 2AM-MRY2540 (NWB, 2025), a dustfall data review is being completed by a qualified team of third-party scientists, and will accompany the 2025 Terrestrial Environment Annual Monitoring Report (TEAMR) associated with the 2025 NIRB Annual Report. The outcomes of the dustfall data review will be integrated into relevant management plans within six (6) months of publication of the dustfall data review.

7.7 2025 GROUNDWATER MONITORING PROGRAM

Baffinland continued to advance the groundwater monitoring program at the Project in 2025. Groundwater consultants, specialized in permafrost environments, were retained to provide guidance in completing the groundwater monitoring program activities at the Landfill Facility and Mine Site Hazardous Waste Berm (HWB) Facility, and provide additional recommendations for the program for future years. The primary objectives of the monitoring program were to assess groundwater quality, evaluate groundwater flow directions, and identify potential contaminants of concern at both waste facilities.

Hydrogeological testing and water quality sampling were carried out to address limitations identified in previous reports and provide a greater understanding of the groundwater/active layer conditions at the project site. Additionally, Baffinland installed two RST (RST Instruments) thermistors to be able to better understand the active layer and permafrost thermal regime.

Based on the 2025 findings, the Conceptual Site Model (CSM) was updated and includes the ground temperature information from the newly installed RST thermistors, the presence of ice-wedge polygons observed on aerial photographs, as well as a review of groundwater quality. With the additional information from monitoring well installations with bentonite seals, the shallow groundwater is thought to consist of a combination of meltwater with rainfall/surface water impacting the groundwater quality. A "*source-pathway-receptor"* approach was used for the CSM to describe the Site conditions as they relate to human health and the environment

For more information on the 2025 Groundwater Monitoring Report refer to Appendix E.11.

7.8 QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC)

Water quality samples collected in 2025 as required by Schedule I of the Type 'A' Water Licence (NWB, 2025) are presented in Table 7.2 and Table 7.3. Samples collected for analysis in 2025 followed the general recommendations presented in the Quality Assurance (QA) and Quality Control (QC) Guidelines for use by Class A Licensees in meeting SNP Requirements and for Submission of a QA/QC Plan (CIRNAC, 1996).

Laboratory analyses of water samples were carried out by accredited analytical laboratories in 2025. A laboratory operated by ALS Environmental located in Waterloo, Ontario and run by ALS Canada Ltd. (ALS), performed the majority of water quality QA/QC sample analyses in 2025. An on-site accredited field laboratory, located at the Mine Site and also operated by ALS, performed select analyses in 2025 (i.e. pH, TSS, Total Dissolved Solids, and turbidity), reducing logistical costs while providing timely results.

ALS adheres to a designated QA/QC Management System, which includes documentation and document control, staff training and internal audits. The practices exceed accreditation requirements for high confidence in data reliability utilising:

- Calibration verification standards and drift control standards;
- Surrogate standards and internal standards;
- Replicate analyses and blanks on submitted samples;
- Standard reference materials (SRM's) and matrix spikes; and,
- Standards Data Quality objectives, established for each QC sample, based on a combination of reference method objectives, customer requirements and historical test method performance.

The laboratory QA/QC data is reported in individual analytical certificates.

Field QA/QC procedures and data quality objectives (DQOs) adopted by the Project are described in detail in the Project's Surface Water Sampling Program - Quality Assurance and Quality Control Plan (BIM-5200-PLA-0004). Field QA/QC samples include the collection of field duplicates and the use of field and travel blanks. Of the 100 discrete sets of Type 'A' Water Licence regulatory samples collected in 2025, field QA/QC samples (8 field duplicates, 4 field blanks and 3 travel blanks) comprised 15% of the total samples collected. This satisfied the minimum 10% QA/QC sampling requirement stipulated in the QA/QC Plan. Baffinland will continue to adhere to the water sampling protocols outlined in the QA/QC Plan, including the 10% QA/QC sampling requirement, to ensure the collection of representative water quality data at the Project.

The results of the QA/QC program and data quality review are presented in Table 7.7, Table 7.8, and Table 7.9. As per the QA/QC Plan, field duplicate and parent sample pairs should meet the DQO of ≤ 20% relative percent difference (RPD) in parameter concentrations of individual parameters analysed. There were five (5) instances where the RPD was greater than 20% and where the reported value was greater than ten (10) times the lower detection limit (LDL). A summary of these duplicates is presented in Table 7.9.

Baffinland uses the following criteria for trip and field blanks: concentrations should be non-detectable, with a DQO of within five (5) times the respective laboratory lowest reportable detection limit for that parameter. If sample results are less than or equal to five (5) times the respective external laboratory's lowest detection limit (LDL) for that parameter, it is considered that such small differences account for generic noise around the limit. If sample results are five (5) times greater than the respective external laboratory's LDL for that parameter, the detected concentration is considered significant and any atmospheric and/or sample handling influences should be investigated.

In 2025, a total of five (5) analytes in the field and travel blanks with result values greater than their respective analyte's LDL were identified in 2025. One (1) of the five (5) analytes had a value greater than five (5) times the value of the respective LDLs. Of the thirty-three (33) total trip blank analyte results, two (2) resulted in analyte detection above the trip blank DQO of less than the LDL. Of the forty-one (41) individual field blank results, three (3) resulted in analyte detections above the DQO of less than the LDL. However, only one (1) exceeded the 5 times greater than the LDL criteria, thus Baffinland concludes that there was negligible contamination, and that field precision and accuracy were considered acceptable.

As part of the QA/QC data analysis process, the number of flagged analytes to the total number of analyzed parameters is used to evaluate analytical precision. For the duplicate samples, all of the sampling events that had RPD exceedances were at the waste treatment facilities. Sampling at these facilities is different than collecting surface water samples where the parent sample and its duplicate can be sampled in tandem. Samples at the waste treatment facilities are taken from a spigot and samples cannot be sampled in tandem which may result in a fluctuation of differences between the parent and duplicate analytes and can lead to RPD exceedances. Analysis of the samples with the RPD exceedances determined that analyte concentrations were sufficiently low as to not affect interpretation of the data or have an impact to the environment.

For the field and trip blanks, only one (1) analyte of all blank results exceeded the 5xLDL criteria for deeming significant enough to investigate. Results of the one (1) analyte exceedance were compared to the parent sample that the blank was taken with and was determined not to have been influenced or impacted in the same way that the field blanks were. The results of the main monitoring samples remained consistent when compared with a few years' worth of data for that sampling location and no outliers or anomalous data were detected.

In summary, the results of the QA/QC data analysis demonstrates that the impact to regulatory water quality monitoring samples is insignificant and within acceptable extent.

Baffinland has continued to provide an increase in training and awareness sessions for all staff that make field and travel blanks and take water quality samples in the field. Corrective actions from previous years that are continually being implemented and enforced are as follows: improved cleaning and storage of water sampling containers, improvements to workspace cleanliness when making blanks, and improvements in Standard Operation Procedures for water sampling and the training of new staff.

8 RECLAMATION, CLOSURE AND FINANCIAL SECURITY

8.1 PROGRESSIVE AND FINAL RECLAMATION

In 2019, evaluation of the condition of the Tote Road by Tetra Tech led to the implementation of a 2020 action plan to address the historic borrow sources on the Tote Road. The 2024 Tote Road Priority Action Schedule (Appendix C.4), outlines the current proposed implementation approach for borrow pits along the Tote Road. Tetra Tech has classified historic borrow sources according to their priority for remediation, with those classified as A+++, A+ or A to be remediated and other borrow areas to be monitored for signs of geotechnical instability or permafrost degradation. Baffinland selects a grouping of priority areas annually and progresses remediation on the borrow locations each year.

Progressive reclamation activities on borrow sources in 2025 included the following:

- Continued implementation of reclamation works at the KM 97 borrow area to facilitate stabilization of the area.
- Reclamation of four (4) historic borrow pits, representing a reclamation area of 22,702 m2:
  - Borrow Pit 14 (KM 89.3);
  - Borrow Pit 14A (KM 89.6);
  - Borrow Pit 41 (KM 50.6); and
  - Borrow Pit 71 (KM 20.5).

The 2026 Tote Road Priority Item Action Schedule, (Appendix C.4) and the 2025 Borrow Pit Reclamation Report (Appendix C.1.6) provide an update on the status of the remediation of historic borrow sources completed in 2025, and implementation schedule which aims to complete an additional 3 borrow area remediations in 2026.

In addition to specific works listed above related to reclamation of historic borrow sources along the Milne Inlet Tote Road, the following progressive reclamation activities continued as part of operations for the Mary River Project:

- Demobilization and backhaul of equipment and supplies not required for near term activities, including the current inventory of hazardous waste and other materials by means of sealifts from Milne Port.
- On-going management of hydrocarbon impacted soils at the Milne Port and Mine Site Landfarm Facilities generated from historical decommissioning efforts and ongoing operations.

A summary of the reclamation works listed above and their implications on financial security held by both the QIA and the Crown (CIRNAC) for the Project are presented in Table 8.1.

8.2 CURRENT RESTORATION LIABILITY

In 2025, a total of $2,969,355 CAD of additional security was posted with the QIA, as determined through the 2025 Annual Security Review.

Closure and reclamation security posted for Project activities as of December 31, 2025 is summarized in Table 8.2.

9 PLANS, REPORTS AND STUDIES

9.1 SUMMARY OF STUDIES REQUESTED BY THE NUNAVUT WATER BOARD

In 2025, studies were not requested by the NWB.

9.2 REVISIONS TO PLANS, REPORTS AND MANUALS

Management and monitoring plans that have been updated since the submission of 2024 QIA and NWB Annual Report for Operations can be accessed on the Nunavut Water Board and NIRB public registries (https://public.nwb-oen.ca/; and https://www.nirb.ca/application?strP=r). Refer to Table 9.1 for a summary of current management plans and revisions, including identification of updated management plans submitted since the 2024 annual report submission. As per the NWB's request, management plan updates are submitted as standalone submissions for review and approval.

9.3 SUMMARY OF FUEL STORAGE

During 2025, bulk fuel storage and dispensing facilities located at the Mine Site and Milne Port were used to support Project activities, including diesel electric power generation and building heat, light and heavy vehicle and equipment operation, fixed-wing aircraft and helicopter flights, and shiploader operations.

Milne Port bulk fuel storage facilities include the following:

- four (4) 12 ML Arctic Diesel field-fabricated tanks;
- two (2) 5 ML Arctic Diesel field-fabricated tanks;
- one (1) 3 ML Arctic Diesel field-fabricated tank;
- three (3) 0.75 ML Jet-A1 pre-fabricated tanks; and
- one (1) 0.75 ML Arctic Diesel pre-fabricated tank.

All tanks are vertical single wall steel construction and designed to API 650 specifications (API Standard 650, 13th Edition 2020). Fuel inventories at the Milne Port Bulk Fuel Storage Facility on December 31, 2025 consisted of 32.9 ML of Arctic Diesel and 1.5 ML of Jet-A1. No significant modifications to the fuel management infrastructure at Milne Port were completed in 2025.

Mine Site bulk fuel storage facilities include the following:

- Mine Site bulk diesel fuel facilities:
  - one (1) 15 ML Arctic Diesel field-fabricated tank; and,
  - four (4) 0.5 ML Arctic Diesel pre-fabricated tanks.
- Mine Site Aerodrome Bulk Jet-A1 fuel facility:
  - two (2) 50,000 L Jet-A1 steel tanks.

The bulk fuel storage facilities at the Mine Site are equipped with lined secondary containment berms, engineered to comply with the Canadian Council of Ministers of the Environment (CCME) "Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum Products" (CCME, 2015). Fuel inventories at the Mine Site on December 31, 2025 consisted of 2.7 ML of

Arctic Diesel at the Mine Site Bulk Fuel Storage Facility and 52,799 L of Jet-A1 at the Mine Site Aerodrome. No significant modifications to the fuel management infrastructure at the Mine Site were completed in 2025.

During 2025, the Milne Port Bulk Fuel Storage Facility was resupplied by fuel tanker vessels during the open-water shipping season via ship-to-shore floating hose fuel transfers. Throughout the year, fuel at the Mine Site Bulk Fuel Storage Facility and Mine Site Aerodrome were resupplied by bulk fuel tanker trucks transporting fuel from Milne Port via the Tote Road.

Drummed fuel was used mainly to support on site helicopters involved with exploration activities and environmental field studies. During 2025, drums of diesel and Jet-A fuel were stored at Milne Port, the Mine Site, and the Steensby Camp, either in hazardous waste berms, or within secondary lined containment. No fuel was stored at the Mid-Rail camp, and fuel used the Bruce Head camp in 2025 was removed at the end of the season.

Baffinland constructs and operates Project fuel storage and dispensing facilities in accordance with applicable guidelines and regulations such as the CCME "Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products" (CCME; 2015), Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations (Canadian Environmental Protection Act, 2008), and the National Fire Code of Canada (Government of Canada, 2020). To protect receiving waters, Baffinland stores drummed fuel, petroleum-based wastes, and other potentially hazardous products within lined containment areas whenever possible. Engineered lined containment areas are in place at the Mine Site, Milne Port, Steensby Port and Mid-Rail camp for the storage of drummed fuel and hazardous products and wastes and at the Brucehead camp, portable secondary containment structures are utilized, as per Baffinland's Hazardous Materials and Hazardous Waste Management Plan (BAF-PH1-830-P16-0011).

9.4 RESULTS OF CHEMICAL ANALYSIS OF INCINERATOR BOTTOM ASH

To confirm that Project incinerators at the Mine Site and Milne Port were operating as designed routine process monitoring was completed throughout 2025. This included monitoring the temperature in the primary chamber and secondary chamber and stack, as well as burn times, system pressure and fuel level.

Prior to disposal at the Mine Site Landfill Facility, residual bottom ash generated from the site incinerators was tested using Toxicity Characteristic Leaching Procedure (TCLP) analysis. TCLP testing of residual bottom ash was conducted to ensure compliance with the Type 'A' Water Licence (Part F, Item 7; NWB, 2025) and confirm that disposal of residual bottom ash at the Landfill Facility will not generate leachate at concentrations above the applicable water quality criteria.

In comparing the TCLP analytical results for the 2025 composite ash samples with the applicable environmental guidelines for non-hazardous solid waste (Government of Nunavut, 2011), ash samples were below the threshold values for monitored parameters with the exception of two (2) ash samples from the Mine Site on January 12 and March 11 which were above the applicable criteria of 5 mg/L for chromium. The ash was subsequently split and placed into Quatrex bags as per Baffinland's Incinerator

Ash Sampling Procedure (BIM-5200-SOP-0015), and resampled; four (4) confirmatory samples were collected for the ash bin sampled on March 11, 2025, which showed compliant results. Confirmatory samples collected for the ash bin sampled on January 12, 2025 confirmed one (1) compliant result and three (3) results above the threshold value for chromium. Ash associated with these three (3) samples was transported to temporary storage for subsequent offsite disposal.

In 2025, a total volume of 46.11m^3 of compliant incinerator ash was disposed in the Landfill Facility, including 19.44m^3 generated from the Mine Site incinerator and 26.68 m^3 generated from the Milne Port incinerator. 2.31m^3 of incinerator ash determined to be hazardous was transported to temporary storage in a designated waste storage area as per Baffinland's Hazardous Materials and Hazardous Waste Management Plan (BIM-5200-PLA-0007) to be subsequently transported off-site during the 2026 backhaul sealift.

Analytical results of the incinerator ash testing in 2025, screened against applicable waste criteria, are provided in Appendix Table E.2.2 and Appendix Table E.2.3 for the Mine Site and Milne Port, respectively. Disposal volumes, and disposal method and status for ash generated by Project incinerators is presented in Appendix Table E.2.1.

Baffinland will continue to conduct routine sampling of residual bottom ash generated by Project incinerators as described above to ensure ash disposed in the Landfill Facility is compliant with the established applicable environmental guidelines. Ash identified by TCLP analysis to exceed the established threshold values will be segregated, packaged and shipped offsite to Southern Canada for disposal at a licensed waste facility.

9.5 SUMMARY OF GEOCHEMICAL ANALYSIS FOR OPERATED QUARRIES

Operational sampling and testing is executed on active quarries to confirm the original predictions that aggregate produced from approved quarries would have a low potential for acid rock drainage and metal leaching. To assess whether a rock is Potentially Acid Generating (PAG) or Non-Acid Generating (Non-AG), representative samples are collected and analysed for total sulphur content and paste pH. If the sample has a paste pH value greater than 6 and a sulphur concentration less than 0.20%, it is classified as Non-AG, while if the sample has either a paste pH value less than 6 or a sulphur concentration greater than 0.20%, it is classified as PAG. In accordance with the terms of the Type 'A' Water Licence (Schedule B, Item 42; NWB, 2025), geochemical analysis results for aggregate produced from approved quarries to support construction and road maintenance activities is submitted annually with the QIA and NWB Annual Report for Operations.

In 2025, there was no additional geochemical analysis completed for quarry sites at the Project, as no drilling or blasting activities were conducted at the Q1 or QMR2 quarries. All materials utilized from the Project quarries for construction in 2025 were blasted in previous years; therefore, there was no borehole drilling and analysis of borehole samples. All results for materials used in 2025 were reported in previous Annual Reports for Operations.

As no additional sampling was completed in 2025 at Project quarries, further evaluation of the potential

for acid rock drainage and metal leaching was not required. In 2026, Baffinland will continue to monitor and evaluate any new geochemical data collected at Project quarries should blasting activities resume, to refine and expand the available dataset and assess the potential for acid rock drainage/metal leaching from Project quarries.

9.6 WASTE ROCK STUDIES AND OPERATIONAL TESTING RESULTS

In 2025, Baffinland continued to characterize and manage Deposit No. 1 waste rock generated by mining operations in accordance with the Phase 1 Waste Rock Management Plan (BAF-PH1-830-P16-0029). A summary of activities executed in 2025 is provided below.

9.6.1 WRF QA/QC Program

All waste deposition in 2025 was in accordance with the Phase 1 Waste Rock Management Plan (BAF-PH1-830-P16-0029). Following the successful implementation of a 4-meter-thick Non-AG cover of the WRF in 2024, Waste Rock QA/QC analysis in 2025 focused on deposited materials with the PAG cell within the WRF and on Non-AG waste Rock used for construction purposes. Results of this program are presented in Table 9.2 and Table 9.3, with graphical representation of geochemistry by destination summarized in Figure 13.

9.6.2 Geochemistry Monitoring Program

Operational testing of waste rock generated by mining operations at Deposit No. 1 continued to be conducted throughout 2025 to inform the management and deposition of PAG and Non-AG waste rock at the Project. The testing methods employed are outlined in the Phase 1 Waste Rock Management Plan (BAF PH1 830 P16-0029) and involve on-site sampling and analysis of blast hole cuttings for total sulphur content and paste pH on all waste samples. The operational testing results provide the basis for determining the appropriate waste rock classification between PAG and Non-AG. Samples analysed to have a paste pH value greater than 6 and a total sulphur concentration less than 0.20% are classified as Non-AG, while samples analysed to have either a paste pH value less than six (6) or a total sulphur concentration greater than 0.20% are classified as PAG. The operational testing results for waste rock generated in 2025 are provided in Appendix Table E.6.1 through E.6.3.

In addition to operational testing, and in accordance with the Phase 1 WRMP (BAF PH1 830 P16-0029), select blast hole samples of both PAG and Non-AG material were submitted for Acid Base Accounting (ABA) and Shake Flask Extraction (SFE) testing off-site, for the purpose of developing a comprehensive geochemical database for the WRF. This discrete testing also confirms the reliability of the field test method.

9.6.3 Water Quality Monitoring Program

As part of the ongoing monitoring at the WRF water quality monitoring was conducted at the east and west ditches where they inflow to the WRF Pond, as well as in two (2) other locations upstream in the east and west ditches. In addition, sampling of drainage/seepage at the perimeter toe of the WRF pile

(Figure 10) was conducted. Samples were collected throughout the summer of 2025, and were dependent on the presence of sufficient flow of water to be collected.

Samples of ditch inflows, and upstream in the ditches to the WRF pond are presented in Appendix Table E.6.4 and E.6.5. A total of forty-eight (48) samples were collected between June 6, 2025 and August 20, 2025 from the ditches of the WRF. Water quality was compared against the WRF Water Quality Lower Action Levels identified in the Waste Rock Facility QAQC Monitoring Plan (BIM-5200-PLA-0034) Trigger Action Response Tables, with no exceedances of the Lower Action Levels for Arsenic, Copper, Lead, Nickel, Zinc, or pH throughout the 2025 season for all samples.

Samples of the drainage/runoff along the toe of the WRF pile are presented in Appendix Tables E.6.6 and E.6.7. A total of forty-one (41) samples were collected between July 4, 2025 and August 19, 2025. Water quality was compared against the WRF Water Quality Lower Action Levels identified in the Waste Rock Facility QAQC Monitoring Plan (BIM-5200-PLA-0034) Trigger Action Response Tables, with no exceedances of the Lower Action Levels for Arsenic, Copper, Lead, Nickel, Zinc, or pH throughout the 2025 season for all samples.

9.6.4 Thermal Monitoring Program

Various instrumentation, including thermistors have been installed throughout the WRF with a primary purpose of characterizing the thermal conditions of the waste rock and to confirm the waste placement strategy is working to maintain the waste rock pile in a perpetually frozen state. A summary of all instrumentation installed to date, its operational status and the date of the last data download is provided in Appendix E.15.1. Overall, the pile continues to present a freezing trend and remains frozen throughout the year, except for the 2 to 3 m active zone which is subject to seasonal freeze and thaw cycles, as per the design intent.

9.6.5 Waste Rock Deposition

Conformance to the Phase 1 WRMP (BAF-PH1-830-P16-0029) deposition strategy was assessed for 2025 waste rock placement. Appendix E.15.2 provides a summary of the results of the waste placement conformance assessment, including figures and documentation supporting the assessment, and corrective actions for any identified non-conformances.

Waste rock deposition is managed as outlined in the Project's Phase 1 WRMP (BAF-PH1-830-P16-0029). Waste rock deposition planning incorporates review of waste rock geochemistry, and WRF thermal, water balance and water quality modelling.

Table 9.2 summarizes the locations where Deposit 1 waste was used for construction purposes, as well as, the relevant chemistry of that waste rock to validate its material type. Geochemistry is presented in Table 9.3 and Figure 13.

9.7 RECLAMATION RESEARCH

Revision 6 of the Interim Closure and Reclamation Plan (ICRP) for the Mary River Project was finalized and issued for use on July 11, 2025. This revision included an update to the research programs that will be

completed to support reclamation planning for the Project. The proposed research programs are detailed in Appendix D of the ICRP, and cover the following topics:

- Open Pit Runoff Water Quality;
- Open Pit Flooding Timeline;
- Waste Rock Stockpile Seepage/Runoff Water Quality;
- Waste Rock Thermal Modelling;
- Natural Revegetation; and
- Environmental Site Assessment and Landfarm Research.

Major reclamation research completed in 2025 included:

- Updated Deposit 1 Pit Water Quality Model;
- Thermistor Installation at the Mine Site Landfill; and
- Annual Monitoring of Natural Revegetation Test Plots.

Updated Deposit 1 Pit Water Quality Model

As committed to during the renewal of Baffinland's Type 'A' Water Licence (Section 12.1), Baffinland completed an update to the Deposit 1 pit water quality model. The model provides water balance and

water quality predictions during Operations from 2025 to 2030, and includes an Early Closure scenario starting in 2031, as well as a post-closure phase extending until 2100. The updated pit water quality model is provided in Appendix E.10.1.

Thermistor Installation at the Mine Site Landfill

To support development of a thermal model of the final cover for the landfill at the Mine Site, Baffinland installed three (3) thermistor strings in the landfill in 2025. The total length of each string was three metres of cable with thermistor beads placed every 0.5 m with an additional five metres of cable that would be above ground surface when installed. The three (3) thermistors were placed in two locations downgradient of the landfill and seventy metres apart, with two (2) of the thermistor strings at one location to characterize ground temperatures down to 5 metres below ground surface (mbgs).

Annual Monitoring of Natural Revegetation Test Plots

Revegetation test plots were established in 2019 and 2021 to monitor for post-disturbance natural revegetation. Follow-up monitoring of these test plots was completed in 2025, and will be reported on in the 2025 Annual Report for the NIRB. A key observation of the revegetation survey is that natural/unassisted revegetation does occur at the Project

9.8 SUMMARY OF QIA-LED MONITORING PROGRAMS AND STUDIES

Type 'A' Water Licence (NWB, 2025) Schedule B Items 26 and 44 require the QIA and NWB Annual Report for Operations to include a summary of results relevant to water use and management and/or waste disposal and management generated by QIA-led monitoring programs and studies (e.g., Inuit Stewardship Program), together with a summary of any agreed actions to be taken by Baffinland in response (including plan updates), where such results are provided to Baffinland by QIA in final at least five (5) months prior to the annual report submission deadline. QIA provided a total of six (6) reports generated under the Inuit Stewardship Program to Baffinland in mid-November 2025, which did not meet the five-month threshold for formal inclusion in the 2025 QIA and NWB Annual Report for Operations. In December 2025, the QIA proceeded to submit the six (6) reports to the NIRB and the NWB, inconsistent with relevant direction, including the process outlined in Schedule B Items 26 and 44.

Subsequently, Baffinland prepared a response to the ISP reports and issued them to the NIRB and the NWB on January 5, 2026. On January 6, 2026 the NWB issued correspondence confirming "the Reports were not required to be filed with the NWB under Type A Water Licence No: 2AM-MRY2540 which governs the Mary River Project, and four of the Reports address issues outside the NWB's freshwater management jurisdiction." Having received Baffinland's response to the two (2) reports relevant to freshwater management, the NWB placed the relevant files on the NWB's public registry for information purposes only and invited any questions to be directly communicated to the QIA or Baffinland. Baffinland has not received any questions regarding the reports or its response to date. Baffinland confirms that the January 5, 2026 submission to the NWB satisfies Baffinland's requirements under Schedule B Items 26 and 44 for the 2025 and 2026 reporting years.

Baffinland remains committed to working collaboratively with QIA to identify and consider results relevant to water and waste management and to document any actions following receipt, joint review and agreement of finalized deliverables and actions resultant of the studies. This approach is intended to ensure that QIA-led monitoring and study outcomes are integrated in a transparent, traceable manner once both parties agree on resultant actions for ongoing adaptive management and continuous improvement.

10 REGULATORY INSPECTIONS AND COMPLIANCE

10.1 REGULATORY INSPECTIONS

Throughout 2025, Baffinland hosted numerous inspections and audits from Crown Indigenous Relations and Northern Affairs Canada (CIRNAC), the Qikiqtani Inuit Association (QIA), the Nunavut Impact Review Board (NIRB), the Workers' Safety & Compensation Commission (WSCC), Environment and Climate Change Canada (ECCC), and Fisheries and Oceans Canada (DFO). Table 12.2 summarizes the 2025 site visits to the Project by the various agencies in 2025. Appendix E.8.1 and Appendix E.8.2 include inspection findings and recommendations by CIRNAC and the QIA, respectively, Baffinland's response, and resolution actions for convenient tracking of inspection comments. Details regarding NIRB site visits will be provided in the 2025 Annual Report to the Nunavut Impact Review Board.

10.1.1 CIRNAC Inspections

CIRNAC Water Resources Officers conducted three (3) inspections of the Project in 2025. The dates of the inspections are as follows:

- January 7-8, 2025;
- June 25-July 1, 2025; and
- October 8-15, 2025.

Inspection results were conveyed during close-out meetings at the Project and documented in Water Licence Inspection Reports distributed to Baffinland following the inspection. The 2025 CIRNAC Water Licence Inspection Reports and Baffinland's responses are provided in Appendix E.8.1. Table 10.1 summarizes the inspection/compliance report findings and actions for 2025.

10.1.2 QIA Inspections

The QIA conducted two (2) inspections and one (1) audit of the Project in 2025 under the Commercial Lease. The dates of the inspections are as follows:

- June 17-20, 2025 (inspection);
- August 6-12, 2025 (audit); and
- September 17-19, 2025 (inspection).

QIA staff, with technical assistance from LGL Limited (LGL), conducted the June and September Environmental Site Inspections. In addition to the inspections, the QIA conducted one (1) environmental audit with assistance from M.A. O' Kane Consultants Inc. (Okane) from August 6 to 12. The findings from the inspections and audit were conveyed during the close-out meetings and documented in subsequent reports and correspondence. The QIA inspection reports along with Baffinland's responses as well as the 2025 environmental audit report, are provided in Appendix E.8.2.

10.1.3 ECCC Inspections

ECCC Enforcement Officers conducted one (1) inspection in 2025. The dates of the site inspection are as follows:

- August 20-22, 2025.

Note, ECCC does not issue written inspection reports.

10.1.4 DFO Site Visits

In 2025, DFO completed one (1) inspection at the Project to inspect fish-bearing crossing locations along the Tote Road. The date of the inspection is as follows:

- August 11-14, 2025.

Baffinland is continuing to work with DFO to address fish passage issues along the Tote Road at specific locations. During 2025, Nunami Stantec completed geotechnical and hydrotechnical assessments of all twenty (20) identified priority culvert crossings. In October, 2025, Nunami Stantec summarized these assessments in a design brief of select crossings (Nunami Stantec, 2025). After reviewing the design brief and visiting the crossing locations in August, DFO approved the proposed works in November, 2025, stating they would be completed under Fisheries Act Section 38 (6) Duty to Take Corrective Action. Construction on approved designs is ongoing and engineering of additional designs continue for the remainder of priority crossings utilising new geotechnical and hydrotechnical information. See Section 2.4 and Section 10.2 for further details about the remedial work on culvert crossings.

10.1.5 Workers' Safety and Compensation Commission (WSCC) Mine Inspections and Visits

The WSCC conducted one (1) inspection of the Project from May 20 to 27, 2025. The inspector carried out general inspections at various locations at the Mine Site and Milne Port.

Deficiencies identified during the general inspections were documented in WSCC inspection reports and provided to Baffinland management and the Baffinland Occupational Health and Safety (OHS) Committee. Three (3) inspection reports were issued: the first report identified seventeen (17) directives, the second report identified seventeen (17) directives, and the third report identified sixteen (16) directives. Nineteen (19) of the required actions were completed while the inspector was onsite, which was reflected in the inspection reports in the Record of Compliance, and in the Inspector's comments which noted that quick action was taken on some of the quick to remedy orders. The remainder of the directives were completed within a timely manner and before the requested completion dates.

10.2 REGULATORY ENFORCEMENT ACTIONS

During 2025, there were no new regulatory enforcement actions issued to the Project by federal or territorial regulators.

DFO issued a Corrective Measures Order, pursuant to the *Fisheries Act*, (DFO, 2024), in 2024 *(Canada, 2024)*, for twenty (20) culvert crossings along the Tote Road. Tote Road culvert upgrades work under the Type 'A' Water Licence (NWB, 2025) commenced in early 2024 and seven (7) of the ten (10) crossings were completed. Post-construction monitoring of the crossings in 2024 and 2025, however, identified deficiencies at select crossings (CV-106, CV-216), post-freshet conditions. In 2025, additional engineering and site specific hydrotechnical and geotechnical assessments were conducted with external expertise to support Baffinland's understanding of the failures observed at some of the crossings that were re-

constructed in 2024. The assessments informed on site specific design specifications for re-constructing settled crossings (CV-216 and CV-106), as well as site specific retrofits and replacement new designs for the remaining thirteen (13) priority culvert crossings. In collaboration with DFO, it was determined that some crossings could be retrofit with minor works to re-establish fish passage while others still required complete re-construction to restore fish passage. Designs and approvals are ongoing with DFO with active work occurring on approved designs in frozen conditions in Q4 2025. As part of design submissions, a specific Fisheries Act Authorization was granted in October 2025 for construction of a new crossing at CV 216, which experienced the most severe settlement after it's 2024 re-construction.

Baffinland also submitted a monitoring plan to evaluate performance of all twenty (20) crossings to DFO in 2025, and the first year of monitoring was conducted in 2025 at culverts constructed in 2024 and results were submitted to DFO. Baffinland is continuing to work with DFO and the QIA to address outstanding issues and implement remedial works and upgrades at the twenty (20) priority watercourse crossings, and to ensure associated authorizations are in place.

11 ADDITIONAL DETAILS REQUESTED BY THE BOARD

No other details on water use or waste disposal were requested by the Board by November 1, 2025 with the exception of items that were submitted throughout 2025 for Water Licence hearing commitments.

12 AMENDMENTS – PENDING AND COMPLETED

12.1 TYPE 'A' WATER LICENCE

Baffinland submitted its Type 'A' Water Licence renewal application to the NWB on June 26, 2024. A Public Hearing for the Type 'A' Water Licence renewal was held on March 11-12, 2025. The renewed Type 'A' Water Licence 2AM-MRY2540 was issued by the NWB on April 28, 2025. During the Technical Meeting and Public Hearing, Baffinland made a number of commitments to address comments from intervenors. The status of these commitments is provided in Appendix Table E.13.2.

12.2 COMMERCIAL LEASE

12.2.1 Option Exercise Notices

Under Section 3 of the Commercial Lease, the Option Exercise Notice (OEN) process allows Baffinland to propose amendments to the limits and classifications of Inuit-Owned Lands captured under the Commercial Lease (QIA, 2013). Baffinland submitted two (2) OENs to the QIA in 2025. The first OEN was submitted to QIA for review and approval on September 17, 2025 to expand the Commercial Lease Boundary for a Tote Road bypass at the CV-216 (KM 80.5) crossing. QIA provided approval of this OEN on September 22, 2025. The second OEN was submitted with the 2026 Work Plan on October 31, 2025, to reconcile Milne Port, Milne Inlet Tote Road and Mine Site Impact Area limits to reflect land disturbance identified through the satellite imagery Disturbed Area Analysis, and to remove proposed quarry areas along the Milne Inlet Tote Road that were added through a 2018 OEN but that have not been developed. This OEN is currently under review by QIA.

12.2.2 Tote Road Adjustment Notices

The Tote Road Reconciliation Agreement between Baffinland and the QIA requires that Baffinland submit for QIA's review and approval a "Tote Road Adjustment Notice" (TRAN) for significant upgrades and realignments of the Tote Road. Three (3) TRAN applications were submitted and approved by QIA in 2025 for a bypass road, culvert replacement and culvert retrofit work on the Milne Inlet Tote Road.

Table 11.1 summarizes the OEN and TRAN applications submitted in 2025.

13 PUBLIC CONSULTATIONS

In 2025, Baffinland's Community & Strategic Development (CSD) and Sustainable Development (SD) teams continued to engage with the communities in relation to the Mary River Project, including the Steensby Component. The company held in-person and virtual meetings, prioritizing face-to-face connections where possible, to ensure effective communication, using multiple platforms such as social media and FM radio to increase transparency and accessibility for local residents. Early engagements to share Project updates involved community consultation call in shows in Kinngait and Kimmirut. These early engagements were followed by regular in-person visits throughout the year.

Community consultation continued throughout the year and was highlighted by a collaborative Government of Canada Federal Tour in March, which brought Baffinland and federal representatives together with communities in Pond Inlet, Kimmirut, Kinngait, Igloolik, Sanirajak, Pond Inlet, Arctic Bay, and Clyde River.

ETIS sessions and training workshops were delivered in multiple communities, including Igloolik, Pond Inlet, Sanirajak, Clyde River, and Arctic Bay. These sessions focused on sharing information, building local understanding, and supporting community capacity, while allowing Baffinland teams to hear directly from participants and respond to local perspectives. Work Readiness Program engagement activities were also held in Igloolik, Arctic Bay, Pond Inlet, Sanirajak, Clyde River, and Iqaluit.

Baffinland teams also supported important regulatory processes, such as the Type 'A' Water License Hearing in Pond Inlet, and participated in regional governance meetings that brought together multiple Hunters and Trappers Organizations.

Baffinland took part in community celebrations and major regional events, including the Hamlet of Pond Inlet's 50th anniversary, the Nunavut Quest and Qamutik Cup, and Nunavut Mining Week, and participated in national and regional forums such as the Northern Lights Tradeshow, the Arctic Sovereignty and Security Summit, and the Nunavut Sivuniksavut 40th anniversary.

Recruitment efforts at Algonquin College supported future capacity, while pre and post shipping meetings with hamlets and partners in Pond Inlet ensured clear communication and coordination around seasonal marine activities.

Baffinland also provided country foods for celebrations in Pond and participated in multiple search, rescue and recovery events utilising helicopter resources to support concerned communities.

The list of meetings held, including teleconferences, and visits to Project sites for 2025 are presented in Table 12.1 and Table 12.2, respectively.

14 SUMMARY OF PROJECT PLANS FOR 2026

The 2026 Work Plan was prepared and provided by Baffinland to relevant parties on October 31, 2025 (Baffinland, 2025c), as required under Section 6.1 of the Commercial Lease and under Part J, Item 2 of the Type 'A' Water Licence (QIA, 2013; NWB, 2025), for the purposes of an Annual Security Review for activities undertaken on an annual basis.

The 2026 Work Plan described the planned development and operation of the mine, ore crushing and land transportation, stockpiling and marine shipment of ore, and the continued development and construction of infrastructure required at Milne Port, the Tote Road, and the Mine Site. Ongoing operation of permitted quarry, borrow and waste retention facilities, and logistical air and sea shipments of equipment, fuel and supplies will continue. Regional exploration programs, ongoing Project environmental monitoring and Tote Road improvements to address safety and fish passage are planned. Baffinland continues to plan for Steensby construction, with limited activities expected in 2026 to occur along the Steensby Railway and Steensby Port areas. These activities are expected to occur within the scope of existing approvals and will be reported, as required, in the annual reporting cycle for the 2026 period.

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