



January 17, 2025

Karén Kharatyan
Director of Technical Services
Nunavut Water Board
Gjoa Haven
Nunavut
X0B 1J0

Dear Karén,

Re: 2025 Work Plan and Waiver of Annual Security Review

Baffinland is pleased to submit the 2025 Annual Work Plan pursuant to Part J, Item 3 of the 2AM-MRY1325 Water Licence. As there are no proposed new activities under the 2025 Work Plan, and ongoing operations do not require any adjustments to the financial security already posted, Baffinland confirms that this year's operational activities are adequately covered with the amount of financial security that is currently posted for the Mary River Project. Furthermore, no new environmental risks or liabilities to the public or stakeholders will be created as a result of the proposed activities—or lack thereof—for 2025.

Based on the rationale provided above, Baffinland requests a waiver of the Annual Security Review for 2025, in alignment with Part C, Item 1(c) of the Water Licence.

Part C, Item 1(c): *The Board may waive the requirements to hold the Annual Security Review referred to in Part C, Item 1(b) provided that adequate rationale is given to stakeholders and interested parties in advance of doing so including the determination that the Project's scope proposed for a particular year may result in only negligible changes to the amount of financial security already posted and create no unsecured environmental risk or liabilities to the public and stakeholders.*

Baffinland values the progress made in 2024 to advance the review of the Interim Closure and Reclamation Plan (ICRP) for the Mary River Project. The updated ICRP (Revision 6) was submitted to the Nunavut Water Board (NWB) on November 1, 2024, and Baffinland remains committed to continuing this review process collaboratively with all stakeholders to achieve approval of the ICRP Rev. 6. To that effect, Baffinland would like to request that the NWB facilitates a formal review and approval of the ICRP Rev. 6 in 2025.

In 2025, Baffinland looks forward to maintaining open communication and a productive working relationship with the NWB and other interested parties. We remain dedicated to ensuring compliance with the Water Licence while safeguarding the environment and community interests.

Thank you for your consideration of this request. Should you require any additional information or clarification, please feel free to contact us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Elisabeth", followed by a period.

Elisabeth Luther
Senior Manager, Regulatory Affairs
Baffinland Iron Mines Corporation

Cc: Lou Kamermans, Senior Director Sustainable Development (Baffinland)