

To: Andrew Keim, Lauren Perrin, CIRNAC QIA, NWB

From: Baffinland Iron Mines Corporation

Date: January 31, 2024

Subject: 2024 Q4 Waste Rock Management Compliance

This memo summarizes the results of 2024 progressive reclamation in alignment with the Waste Rock Facility (WRF) QAQC Monitoring Plan, included as part of the Phase I Waste Rock Management Plan (WRMP) issued April 2nd, 2024.

Summary

The placement of waste rock during 2024 Q4 was consistent with the most recent WRMP commitment to cover exposed Potentially Acid Generating (PAG) waste with a 4 m thick layer of non-Acid Generating (non-AG) waste. The portion of the WRF overlain by non-AG waste increased from 50 % at the end of Q3 to 92 % in Q4. The QAQC program did not reveal any inconsistencies with material classification for cover placement and the TARP performance indicators did not require any corrective actions in Q4. In 2025, Baffinland will maintain no more than 15 % of exposed PAG at all times.

Q4 WRF Coverage Progress

The portion of the WRF overlain by non-AG waste increased from 50 % at the end of Q3 to 92 % (total area 357,322 m²) in Q4. This 42 % increase includes 16 % (63,610 m²) area covered with 4 m of Non-AG waste placed in Q4 and 26 % (99,595 m²) area confirmed to already have 4 m of non-AG waste as part of a comprehensive drilling and sampling program completed in Q4. Details of waste placement and the drilling and sampling program are discussed below. A drawing of the WRF surface highlighting Non-AG and PAG areas is included in Appendix A.

4 m Non-AG Waste Placement

Mine Operations placed 626,672 tonnes of non-AG material in Q4. The portion of the WRF covered by 4 m of non-AG increased by 16 % (63,610 m²).

Dump compliance was fully adhered to with 100 % of PAG loads placed within delineated PAG cell. Records supporting in-pit material identification and WRF placement can be found in Appendix B.

The QAQC sampling was completed on January 20, 2025 and consisted of drilling 10 holes into the 4 m Non-AG cover lift placed during Q4. The drill hole locations are shown on the drawing provided in Appendix A. Holes were drilled to a depth of 2 m and samples collected from 0.5 to 2.0 m depth. Samples were tested on-site for total sulphur and paste pH before being shipped off-site for Modified Sobek testing. Assay results from the on-site laboratory are presented in Appendix C, as well as the results for Q3 Modified Sobek. Due to longer turnaround time, results for Q4 Modified Sobek testing will be shared at a later date.



Results from on-site testing indicate material within the 4 m cover lift is classified as Non-AG using the waste rock classification criteria presented in Section 6 of the Phase 1 Waste Rock Management Plan.

WRF Drilling and Sampling Campaign

Baffinland engaged WSP Canada Inc. (WSP) to develop a comprehensive drilling and sampling program to validate the classification of existing material in the top 4 m of selected zones of the WRF surface as PAG or Non-AG. The purpose of the program was to evaluate selected zones to determine if there was a 4 m cover of Non-AG and these zones are therefore already covered. The method, analysis and results of the drilling and sampling campaign developed by WSP is detailed in the Waste Rock Facility Drilling and Sampling Campaign, Cover Requirement Evaluation report (WSP, 2025).

This investigation increased the area covered by 4 m of Non-AG waste by 26 % (99,595 m²) in Q4.

2025 WRF Action Plan

The performance indicators outlined in the quarterly monitoring plan for Q4 were fully compliant, demonstrating a strong alignment with established standards. The comprehensive quarterly Trigger Action Response Plan (TARP) audit, detailed in Appendix E, confirms that all processes were executed effectively.

Corrective actions from 2024 will remain in place and be actively monitored, with continued followup to ensure adherence to the waste dump deposition plan. All PAG waste will be properly placed within the designated PAG cell, maintaining no more than 15 % of exposed PAG at all times. At this time, no additional corrective actions are required.

In 2025, Baffinland will maintain a maximum of 15 % of exposed PAG at all times. As the progressive reclamation of the waste rock facility was completed in 2024, Baffinland plans to update the quarterly reporting requirements outlined in the QAQC WRF Monitoring Program to move towards annual reporting. Baffinland plans to continue reporting on waste rock placement as part of its annual reports. Baffinland will submit proposed revisions to the management plan as part of the NWB-QIA Annual Reports for Operations.

References

Baffinland Iron Mines Corporation, 2024. Phase I Waste Rock Management Plan.

BAF-PH1-830-P16-0029, Rev 4.1. Issued April 2, 2024, 378 pages.

Baffinland Iron Mines Corporation, 2024. Waste Rock Facility QAQC Monitoring Plan.

BAF-PH1-340-P16-0004, Rev 2. Issued March 25, 2024, 29 pages.

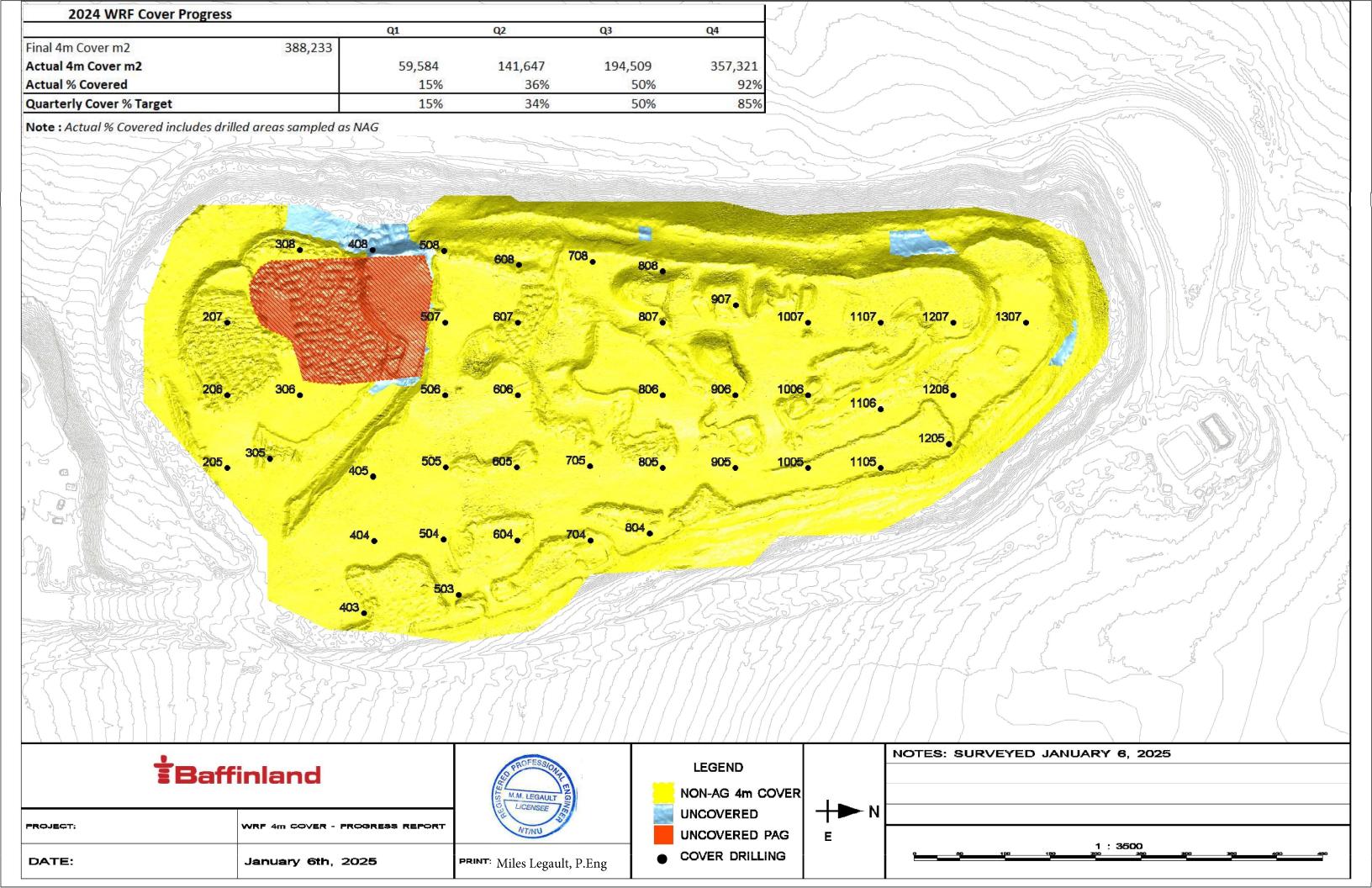
WSP, 2025. Waste Rock Facility Drilling and Sampling Campaign, Cover Requirement Evaluation. CA0044106.3476-003-TM-Rev0. Issued January 30, 2025, 15 pages.

Appendices

- Appendix A: WRF 4 m Cover Progress Drawing
- Appendix B: In-pit Material Identification
- Appendix C: WRF Non-AG Cover Placement Verification Testing Results
- Appendix D: Quarterly TARP Audit



Appendix A: WRF 4 m Cover Progress Drawing





Appendix B: In-Pit Material Identification



| In-pit Material Identification | | | | | | | | |
|--------------------------------|----------|--------|-----------|--|--|--|--|--|
| Dig Block ID | Material | Tonnes | Sulphur % | | | | | |
| N1_440_001_800 | Non-AG | 23532 | 0.06 | | | | | |
| N1_440_001_810 | Non-AG | 18444 | 0.04 | | | | | |
| N1_440_001_900 | AG | 36252 | 0.68 | | | | | |
| N1_440_003_810 | Non-AG | 212 | 0.03 | | | | | |
| N1_440_003_900 | AG | 6360 | 0.23 | | | | | |
| N1_440_004_900 | Non-AG | 1272 | 0.25 | | | | | |
| N1_440_005_800 | Non-AG | 212 | 0.04 | | | | | |
| N1_440_007_810 | Non-AG | 37312 | 0.13 | | | | | |
| N1_450_004_900 | AG | 5300 | 0.21 | | | | | |
| N1_450_011_810 | Non-AG | 6784 | 0.11 | | | | | |
| N1_450_011_900 | AG | 6148 | 0.24 | | | | | |
| N1_450_013_810 | Non-AG | 424 | 0.07 | | | | | |
| N1_450_015_800 | Non-AG | 95188 | 0.05 | | | | | |
| N1_450_019_810 | Non-AG | 42188 | 0.04 | | | | | |
| N1_450_019_900 | AG | 45792 | 0.20 | | | | | |
| N1_460_018_810 | Non-AG | 2756 | 0.16 | | | | | |
| N1_460_018_900 | AG | 636 | 0.16 | | | | | |
| N1_460_031_810 | Non-AG | 13144 | 0.02 | | | | | |
| N1_460_033_810 | Non-AG | 90524 | 0.02 | | | | | |
| N1_460_033_811 | Non-AG | 10812 | 0.04 | | | | | |
| N1_460_033_900 | AG | 212 | 0.43 | | | | | |
| N2_640_113_800 | Non-AG | 32860 | 0.05 | | | | | |
| N2_640_113_900 | AG | 55968 | 0.57 | | | | | |
| N2_640_115_800 | Non-AG | 93280 | 0.02 | | | | | |
| N2_650_113_800 | Non-AG | 86920 | 0.01 | | | | | |



Appendix C: WRF Non-AG Cover Placement Verification Testing Results



Q4 QAQC Sampling Results with Modified Sobek

| | | Recvd Wt. | Dry Wt. | Moisture | S | Paste pH | FIZZ RATING | NP | MPA | NNP | Ratio |
|---------|---------|-----------|---------|----------|-------|----------|-------------|-------------------------|-------------------------|-------------------------|----------|
| Hole ID | ALS ID | kg | kg | % | % | Unity | Unity | tCaCO ₃ /1kt | tCaCO ₃ /1kt | tCaCO ₃ /1kt | (NP:MPA) |
| 604 | G955064 | 2,71 | 2,4 | 11,45 | 0,011 | 8,2 | 1 | 7 | 0,3 | 7 | 22,4 |
| 405 | G955065 | 6,06 | 5,74 | 5,28 | 0,036 | 8,6 | 1 | 8 | 0,9 | 7 | 8,53 |
| 605 | G955066 | 3,3 | 2,91 | 11,8 | 0,034 | 8,8 | 1 | 8 | 1,3 | 7 | 6,4 |
| 503 | G955067 | 5,2 | 4,91 | 5,58 | 0,03 | 8,2 | 1 | 8 | 0,9 | 7 | 8,53 |
| 1307 | G955068 | 5,04 | 4,81 | 4,56 | 0,01 | 8,3 | 1 | 9 | 0,3 | 9 | 28,8 |
| 404 | G955069 | 7,63 | 7,25 | 4,98 | 0,023 | 8,9 | 1 | 11 | 0,6 | 10 | 17,6 |
| 504 | G955070 | 6,84 | 6,38 | 6,73 | 0,047 | 8,3 | 1 | 12 | 1,3 | 11 | 9,6 |
| 705 | G955071 | 5,37 | 4,52 | 15,85 | 0,016 | 9 | 1 | 8 | 0,6 | 7 | 12,8 |
| 403 | G955072 | 5,35 | 4,9 | 8,41 | 0,026 | 8,4 | 1 | 20 | 0,9 | 19 | 21,33 |
| 505 | G955073 | 4,48 | 4,24 | 5,36 | 0,02 | 8,7 | 1 | 10 | 0,6 | 9 | 16 |
| 804 | G955074 | 4,92 | 3,82 | 22,4 | 0,09 | 8,8 | 1 | 8 | 2,8 | 5 | 2,84 |
| 305 | G955075 | 4,4 | 3,6 | 18,2 | 0,119 | 8,5 | 1 | 9 | 3,8 | 5 | 2,4 |
| 1105 | G955076 | 5,15 | 4,6 | 10,7 | 0,015 | 8,3 | 2 | 46 | 0,3 | 46 | 147,2 |

Q4 QAQC Sampling Results

| | | Recvd Wt. | Dry Wt. | Moisture | S | Paste pH |
|---------|---------|-----------|---------|----------|-------|----------|
| Hole ID | ALS ID | kg | kg | % | % | Unity |
| 306 | M506028 | 12.41 | 11.87 | 4.35 | 0.17 | 8.1 |
| 806 | M506029 | 8.78 | 8.1 | 7.74 | 0.024 | 8.6 |
| 704 | M506030 | 6.74 | 6.22 | 7.72 | 0.045 | 8.9 |
| 607 | M506031 | 8.93 | 7.54 | 15.55 | 0.026 | 8.2 |
| 506 | M506032 | 10.67 | 9.98 | 6.47 | 0.033 | 8.2 |
| 206 | M506033 | 10.19 | 9.85 | 3.34 | 0.022 | 8.7 |
| 308 | M506034 | 9.5 | 8.99 | 5.37 | 0.06 | 8.4 |
| 207 | M506035 | 7.83 | 7.67 | 2.04 | 0.056 | 8.9 |
| 606 | M506036 | 8.86 | 8.5 | 4.06 | 0.024 | 8.9 |
| 507 | M506037 | 9.25 | 8.94 | 3.35 | 0.019 | 8.8 |





Appendix D: Quarterly TARP Audit



| | Weekly Waste D | 01-Oct | 31-Dec | | |
|-----------------------------|---|---|---|---|---------------------|
| Project Activity Objectives | | Performance Indicators Monitoring Program | | Status | Response |
| Material Classification | Ensuring accurate material categorization | Chemical characteristics and categorization of dig blocks | Quarterly Audit of Dig Blocks | Not Required | No action required. |
| Material Classification | Ensuring accurate material categorization | Chemical characteristics and categorization of dig blocks | Quarterly Total Sulfur vs ABA confirmation testwork, and SFE analysis | Not Required | No action required. |
| Execution Control | Adherence to WRMP | Dump Compliance | G | 100% of loads within allowed PAG dumping locations | No action required. |
| Execution Control | Adherence to WRMP | Lift Thickness. Cover thickness. | Quarterly Reporting and Planning | Lift thickness, Cover thickness 100% compliant | No action required |