WASTE MANAGEMENT PLAN

Nagvaak Project, NUNAVUT,

Effective Date: May 2022

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1. Preamble

This Waste Management Plan (WMP) is in effect until the expiry of StrategX Elements Corp. (StrategX or the Company) water licence and land use permit and land use licence and applies to the work areas planned for the Nagvaak Project.

The Nagvaak Project is in the Kivalliq Region of Nunavut, approximately 170 km NE from Naujaat, and consists of both mineral claims and leases on Inuit-Owned Lands (surface rights), and Inuit- Owned Lands (subsurface)

Year-round access to the property is via helicopter. The property is bounded in a general sense by the following minimum and maximum latitudes/longitudes:

Min (degree/minute)	Lat	67.480 N	Min (degree/minute)	Long	83.025 W
Max (degree/minute)	Lat	67.506 N	Max (degree/minute)	Long	83.240 W

StrategX Elements Corp has applied for licences and permits from the Kivalliq Inuit Association (KIA) for activities on Inuit Owned surface land (IOL), and a water licence from the Nunavut Water Board (NWB) for water use and waste disposal related to the project.

A letter of authorization from the Hamlet of Naujaat will be requested and appended to this Plan.

Questions or concerns regarding this Plan can be directed to

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Attention: Adam Vary, Project Manager
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2.Introduction

This Waste Management Plan ("WMP") has been developed for StrategX Elements Corp in accordance with applicable legislation, guidelines, and best practices. This WMP applies to the activities associated with the Nagvaak Project (the "Property" or "Project"), located in the Kivalliq Region of Nunavut, Canada.

2.1 Purpose and Scope

The primary objective of the Nagvaak Project WMP is to provide employees and contractors with operational guidelines to minimize the generation of wastes and facilitate the collection, storage, transportation, and disposal of wastes while minimizing adverse effects on the environment. The WMP includes the following:

- A summary of regulatory requirements.
- Potential waste minimization, recycling, and reuse options.
- Methods for collection, storage, and disposal of hazardous and non-hazardous wastes.
- Ways to minimize environmental impacts.
- Training, inspection, and monitoring efforts.

2.2 Other Plans

The WMP should be considered as a part of the Property wide management system. Other management plans in place at the Nagvaak Project include:

- Abandonment and Restoration Plan (ARP)
- Wildlife Monitoring and Mitigation Plan (WMMP)
- Spill Contingency Plan (SP)

2.3 Property and Camp Description

This Plan has been prepared for one diamond drilling location on StrategX's Nagvaak Project.

All exploration activities are based out of North Arrow's Mel camp on crown land, under an agreement between the two companies. Exploration based out of the camp is helicopter supported and generally consists of prospecting, till sampling, geophysical surveys, and mapping. Depending on the results of initial exploration, drilling may be planned.

2.5 Applicable Legislation and Guidelines

Acts, regulations, and legislation that relate to waste management in Nunavut are listed below:

2.5.1 Federal

- Canadian Centre for Occupational Health and Safety Act
- Canadian Environmental Protection Act
- Fisheries Act
- Nunavut Waters and Nunavut Surface Rights Tribunal Act
- Transportation of Dangerous Goods Act
- National Fire Code of Canada
- Northern Land Use Guidelines
- Workplace Hazardous Materials Information System (WHMIS)
- CCME Environmental Codes of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products
- Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations
- Guidelines for Spill Contingency Planning (CIRNAC)

2.5.2 Territorial

- Fire Prevention Act
- Environmental Protection Act
- Mine Health and Safety Act and Regulations
- Public Health Act
- Safety Act
- Nunavut Occupational Health and Safety Regulations
- Environmental Guideline for the General Management of Hazardous Waste

3 Waste Management

3.1 Definition of Wastes

Given that no camp on IOL is proposed, and exploration activities other than drilling do not generate waste, the only waste associated with this plan will be drilling and its associated activities (refueling the helicopter, lunch bags, heater in the drill shack, pump for obtaining water from any hearby water source).

Waste at the Nagvaak Project is any material or substance that can no longer be used for its intended purpose, and is destined for recycling, disposal, or storage. Hazardous wastes are broadly defined by the Nunavut Department of Environment's Environmental Guideline for the General Management of Hazardous Waste as being "any unwanted material or products that can cause illness or death to people, plants and animals". Hazardous wastes may include waste petroleum products, solvents, paints, waste

chemicals, batteries, and any combination of hazardous and non-hazardous materials (i.e., mixed waste).

3.2 Waste sources

Tables 2.1 and 2.2 provide a summary of the expected types of hazardous and non-hazardous (inert) wastes to be generated at the Nagvaak Project.

Table 2.1: Non - hazardous (Inert) Wastes

Waste Type	Examples	Estimated Quantity Generated	Treatment/Disposal Method
Combustible solid waste	Food wastes, paper, untreated wood	Variable	Backhaul to the Mel camp for disposal
Hazardous waste or oil	Used oil	Minimal	Backhaul to the Mel camp for disposal
Contaminated soil/water	Hydrocarbons	Variable/ negligible	Backhaul to the Mel camp for disposal
Drilling Greywater	Drill cuttings & water	≤ 289 (m3/day)	Sump located adjacent to drillhole; allowed to percolate into overburden; minimum distance of 100 m from nearby water sources.

Table 2.2: Hazardous Wastes and Pollutants

Waste Type	Examples
Petrochemicals	Diesel, jet fuel, gasoline, various oils
Solvents	Cleaning products
Contaminated soil	Contaminated soil/snow/water

3.3 Waste Management Activities

Waste management operations at the Nagvaak Project comprise a number of activities with the common goal of reducing the amount of waste generated on site and to ensure that any wastes created are reused, recycled, or disposed of in a responsible manner.

3.4 Waste Recovery and Reuse

Recovery and reuse options at the Project are limited due to the site's remote location and are restricted largely by the technology and equipment available on the Property. However, any available opportunity for waste recovery and reuse will be taken.

4 Waste Classification and Disposal Plan

4.1 Hazardous Wastes

All hazardous wastes will be placed in sealed containers and stored within secondary containment until they can be backhauled to the Mel Camp for or disposal.

4.1.1 Used Oil

Waste lubricating oils will be collected and backhauled to the Mel Camp and returned to a registered hazardous waste receiver.

4.1.2 Hydraulic Fluid

Whenever possible, hydraulic fluids will be filtered and reprocessed for reuse. Hydraulic fluid that cannot be reprocessed will be backhauled to the Mel Camp and sent to an approved facility.

4.1.3 Contaminated or Expired Fuels

Contaminated or expired fuels, such as Jet A aviation fuel, should remain clearly labeled and tightly sealed in their original containers within the fuel storage area. The fuels will be backhauled to the Mel Camp and sent to an approved facility.

4.1.4 Solvents

Whenever possible, non-toxic alternatives will be used in place of petroleum-based solvents. Excess or waste solvents will be packaged in clearly labeled, original, tightly sealed containers, or manufactured containers designed for solvent transport. Waste solvents will be backhauled to the Mel Camp and sent to an approved facility.

4.1.5 Contaminated Soil, Snow, and Ice

Any contaminated soil, snow, or ice will be cleaned up immediately in accordance with the StrategX Elements Corp, Nagvaak Project “Spill Contingency Plan” All contaminated soil, snow, and ice will be sealed in 205 L steel drums and will be backhauled to the Mel Camp and sent to an approved facility.

4.1.6 Used Rags and Sorbents

Used rags and sorbents will be placed in clearly labeled, tightly sealed containers, such as 205 L steel drums, and will be backhauled to the Mel Camp and sent to an approved facility.

4.1.7 Empty Hazardous Material Containers and Drums

Empty containers will be backhauled to the Mel Camp returned to the supplier or drums may alternatively be drained, air dried, backhauled to a recycling facility.

4.1.8 Food Waste and Packaging

Food waste from the drill site will be backhauled to the Mel Camp and disposed of to avoid attracting wildlife.

5 Training

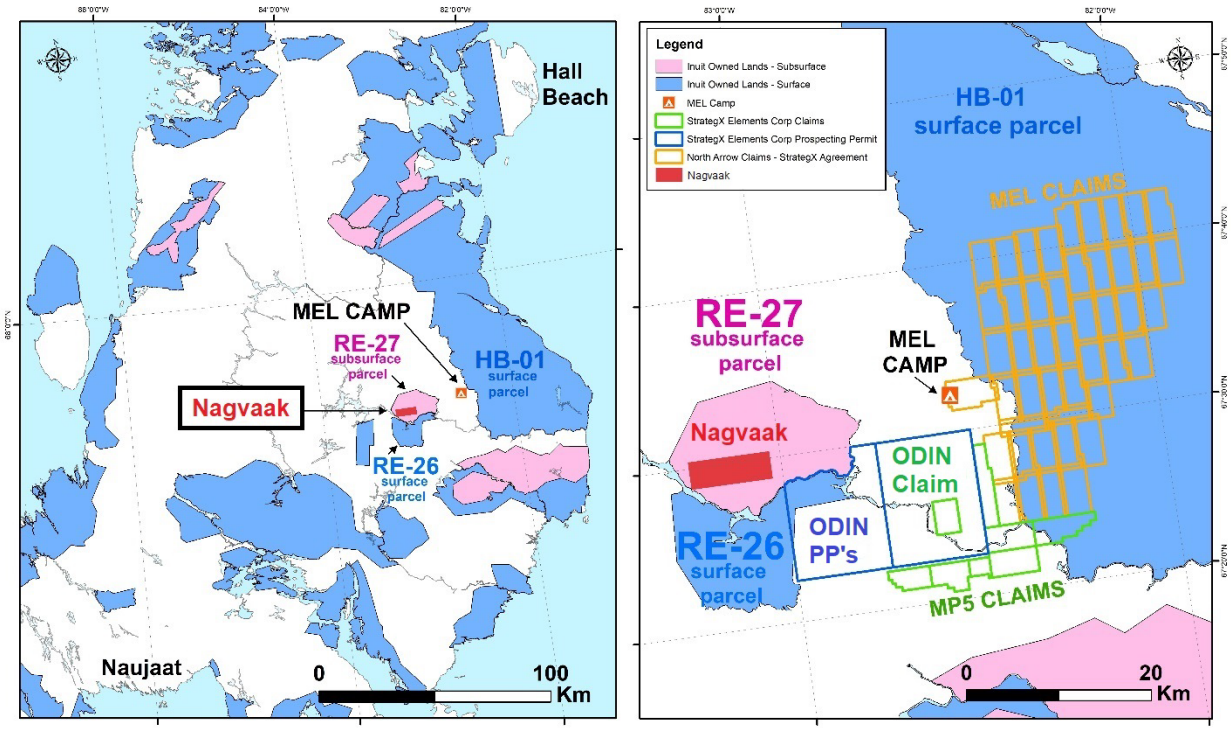
All on site management and any personnel required to handle hazardous wastes must have valid First Aid, WHMIS, and Transportation of Dangerous Goods (TDG) training. Site and job-specific training will be provided to all personnel who are required to handle waste materials. All employees and contractors will receive training in emergency response and spill response, as outlined in the Nagvaak Project “Spill Contingency Plan”.

6 Inspection and Monitoring

Inspections of the hazardous waste storage area and other waste storage facilities will be conducted daily. Regular inspections will include an assessment of the condition of waste receptacles and storage containers, checking for any damaged or leaking containers or berms, and ensuring that waste is collected and stored in the correct containers and storage areas. More detailed weekly inspections will be conducted to ensure the hazardous waste inventory is up to date, secondary containment is in place and in good condition, and spill kits are fully stocked and available. Any leaks or spills will be treated as outlined in the “Spill Contingency Plan.”

The Project Supervisor is responsible for supervising the monitoring and inspection program and keeping a detailed inventory of all hazardous wastes on site.

Appendix 1: Figures



Letter of Authorization from the Hamlet of Baker Lake