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WILDLIFE MONITORING AND MITIGATION PLAN PISTOL BAY PROJECT, NUNAVUT

December 2021

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1. Preamble

This Wildlife Monitoring and Mitigation Plan (WMMP) is in effect until the expiry of Nordgold's (Northquest Ltd.) water licence and land use permit's and applies to the work areas planned for the Pistol Bay property. These work areas lie within the municipal boundary of Whale Cove, on Crown Land and on Kivalliq Inuit Association (KIA) Inuit Owned (IOL) surface land.

Northquest has received licences and permits from Crown Indigenous Relations and Northern Affairs Canada (CIRNAC) for exploration activities on Crown Land, the Kivalliq Inuit Association (KIA) for activities on Inuit Owned surface land (IOL), a water licence from the Nunavut Water Board (NWB) for water use and waste disposal related to the project, as well as permission from the Hamlet of Whale Cove and Permission to Occupy from the Government of Nunavut Department of Community and Government Services (GN CGS) for activities on Commissioners Land.

Questions or concerns regarding this Plan can be directed to

David Smith
Exploration Manager, Canada
NORDGOLD (Northquest Ltd.)
Suite 301 - 82 Richmond Street East,
Toronto, Ontario
Canada M5C 1P1

T: (416) 306-0954 C: (647) 549-0954

EMAIL: david.smith@nordgold.com

www.nordgold.com

1 INTRODUCTION

This Plan has been prepared for one temporary campsite and several proposed diamond drilling locations on Northquest Ltd's Pistol Bay project.

The campsite is located approximately 4.2 km west of the old site and is 300-400m northwest of and downslope from an old, abandoned trailer near the main road, approximately 22km from town. Water can be drawn from the fish-bearing lake approximately 550m northwest from the old, abandoned trailer.

The camp site (Latitude: 62° 20' 30" Longitude: 92° 49' 48" W) is closer to the Vickers Gold Deposit, it has a water source that does not freeze to the bottom in winter

The temporary exploration camp consists of several aluminum framed 14' by 16' tents on plywood floors, a plywood kitchen, a plywood core logging tent, and can accommodate up to 35 people. Exploration based out of the camp generally consists of prospecting, till sampling, geophysical surveys, mapping, and diamond drilling.

Northquest Ltd personnel and contractors can travel by pick-up to Whale Cove, the Whale Cove airport and to the Vickers drill target. However, a helicopter is still the primary mode of transport for the project.

Nordgold (Northquest Ltd.), (the Company) acknowledges that exploration programs have the potential to impact wildlife and wildlife habitat. Potential impacts to wildlife and wildlife habitat include displacement from and avoidance of wildlife habituation and attraction to personnel and/or the camp, and unintentional interactions and disturbance. The Company further recognizes that the caribou is of sensitivity in the regional project area. Accordingly, Nordgold (Northquest Ltd.) will rigorously work to prevent or minimize potential impacts on caribou and other wildlife and wildlife habitat by implementation of the Wildlife Monitoring and Mitigation Plan, as presented in this document.

Exploration activities carried out by Northquest Ltd., will be undertaken in a manner that minimizes disturbances to caribou herds and their calving grounds. Low-level helicopter flights over migrating herds and active calving grounds will be avoided; the helicopter will fly above 300 m except during slinging operations or when weather conditions force flying at lower altitudes. Prior to any slinging operations the area will be visually inspected to ensure there are no animals present; slinging operations will not be carried out during the presence of caribou herds. All on-site personnel will act as wildlife monitors and records of wildlife sightings will be maintained.

The main purpose of the Plan is to formally outline Nordgold's wildlife protection, avoidance and mitigation strategies. The Plan will function as a set of Standard Operating Procedures for staff and contractors working on the Project and on lands proximal to the project, inclusive of those surrounding the local Hamlet of Whale Cove. The Plan commits

to wildlife protection by preventing or minimizing personnel/wildlife interactions and wildlife impacts.

The Plan addresses the following specific wildlife species, species groups and their critical habitats:

- Those that occur within and immediately adjacent to the project site or along project flight paths during project operations,
- Those that are important harvestable species, and
- Those with special conservation status

Table 1:

Wildlife Species and Species Groups addressed by the Wildlife Monitoring and Mitigation Plan.

| Species or Species Group | Species or Species Group |
|-------------------------------|--|
| Caribou | Geese(and their nests) |
| Polar Bears | Other Waterfowl and Waterbirds (and their nests) |
| Moose | Ptarmigan (and their nests) |
| Muskox | Short-eared Owl (and their nests) |
| Arctic Fox (and their dens) | Peregrine Falcon (and their nests) |
| Wolf (and their dens) | Rough Legged Hawk (and their nests) |
| Grizzly Bear (and their dens) | Gyrfalcon (and their nests) |
| Wolverine (and their dens) | Other Falcons (and their nests) |
| Fish (and aquatic life) | |

2 CARIBOU

According to the Terms and Conditions outlined in the Crown Indigenous Relations and Northern Affairs Land Use Permit, the Company must follow the "Caribou Protection Measures as outlined, for exploration on Crown Land:

Caribou Protection Measures

- (a) The Permittee shall not, without approval conduct any activity between May 15 and July 15 within the Caribou Protection Areas depicted on the map certified by the Engineer as the "Caribou Protection Map" and annexed to this Land Use Permit,
- (b) A Permittee may, upon approval by the Land Use Inspector, operate in the said Caribou Protection Areas beyond the May 15 deadline set out in 1 (a) provided that when monitoring information indicates caribou calves are approaching the area of operation, the Permittee will implement 1 (c)
- (c) On cessation of activities pursuant to 1 (a) or 1 (b) the Permittee will remove from the zone all personnel who are not required for maintenance and protection of the camp facilities and equipment, unless otherwise directed by the Land Use Inspector. The Permittee may commence or resume activities prior to July 15 within those parts of the Caribou Protections Areas released by the Land Use Inspector for the reason that caribou cows are not expected to use those parts for calving or post calving.

In the event that caribou cow calve outside of the Caribou Protection Areas, the Permittee shall suspend operations within the area(s) occupied by cows and/or calves between May 15 and July 15.

In the event that caribou cows and calves are present, the Permittee shall suspend blasting, overflights by aircraft at any altitude of less than 300 meters above ground level and; use snowmobiles and ATV's (all terrain vehicles) outside the immediate vicinity of the camp.

During migration of caribou, the Permittee shall not locate any operation so as to block or cause a substantial diversion to caribou.

The Permittee shall cease activities that may interfere with migration, such as airborne geophysical surveys or movement of equipment, until migrating caribou has passed.

The Permittee shall not, between May 15 and September 1, construct any camp, cache or conduct any blasting within 10 kilometers of any "Designated Crossing" as outlined on the map certified by the Engineer as the Caribou Protection Map" and annexed to this Land Use Permit.

| The Permittee shall not, between May 15 and September 1, conduct any diamond drilling operation within 5 kilometers of any "Designated Crossing" as outlined on the map certified by the Engineer as the "Caribou Protection Map: and annexed to this Land Use Permit. * (it should be noted that the Company |
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| has requested the map from CIRNAC Dec 10, 2021 and it was received.) |
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| Nordgold (Northquest Ltd.) Pistol Bay Project |

3 INTERNAL POLICIES AND MITIGATION MEASURES

Caribou and All Other Wildlife

All Nordgold (Northquest Ltd.) employees and contractors will be made aware of all internal policies, procedures in addition to the Terms and Conditions of the Project's licenses and permits. Training will include, but will not be limited to:

- Spill contingency/response
- · Environmental policies
- Safety
- Bear safety
- Wildlife Mitigation Measures
- Caribou Protection Measures

The Project lies adjacent to the Barrenland Caribou calving grounds to the west. Nordgold (Northquest Ltd.) has adopted the following best management practices to protect wildlife and wildlife habitat and mitigate against disturbance to wildlife and sensitive areas.

These policies will be strictly enforced. Any employee or contractor who is found to be violating any of these rules will find their employment immediately terminated and removed from the Project.

 Approaching and feeding wildlife is prohibited. There are absolutely no exceptions to this rule. If wildlife is present in the area, all employees and contractors are to avoid any contact with the wildlife.

Harassment and disturbance of wildlife is prohibited. The Company works with the Issatik Hunters and Trappers Organization to avoid or minimize the impact on wildlife and agrees that, if any employees and contractors are approaching a work site where migrating caribou, caribou cows and calves, muskoxen nurse groups are in the area, this work site will be avoided until the animals have moved on to a safe distance from the site. The Company will also seek the advice from the HTO on avoidance and mitigation measures when migrating caribou are near the Vickers deposit, and commonly follow the shoreline.

- If employees and/or contractors encounter wildlife at any time, every effort should be made to stay out of sight of wildlife or redirect travel away from wildlife where possible to avoid impact to wildlife.
- Hunting and fishing is prohibited. While conducting business on behalf of Nordgold (Northquest Ltd.), hunting and fishing is strictly prohibited. There are no exceptions to this rule.

- Low-level aircraft and helicopter flights will be kept to a minimum. Low-level (<300m altitude) aircraft and helicopter flights will avoid wildlife occupied areas that are migration, calving, nesting and denning habitats. No aircraft landings will occur within migrating caribou, caribou cows and calves, or muskoxen nurse groups.
- Helicopter pilots will be instructed that they are not to fly over wildlife in a way to cause them to change behaviour, run or flee at any time, within, or outside of migration. If such an interaction should occur incidentally, helicopter pilots will be instructed to divert and/or change altitude as quickly as safely practicable.
- A trained Wildlife Monitor will be employed during periods of caribou migration.
 The Wildlife Monitior will advise the Project Manager and/or Drill Foreman if caribou, caribou cows and/or calves are within 2 km of the drill site.
- Bear Safety Training will be provided. All employees and contractors will receive Bear Safety Training. Bear safety information and material will be kept in a binder at site. The Government of the Nunavut's "Territorial Safety in Bear Country Manual" will be referred to in the safety orientation that all personnel and contractors receive when they arrive at site.
- If bears are present in the area, work will cease until they have moved safely out of the area. All human-bear interactions are to be reported immediately to the Government of Nunavut Department of Environment. A company employee will be designated as the Wildlife Monitor, and he/she will be trained in bear safety will ensure that camp employees and contractors are safe.
- All den sites are to be avoided. In consultation with the Whale Cove Hunters and Trappers Organization, locations of bear denning sites will be determined. If an active den site is discovered, the GPS coordinates will be recorded so that the site can be avoided during the denning season. These coordinates will be provided to the appropriate regulatory authorities. No dens are to be disturbed.

| Bear incidents and/or interactions, and wolf or fox den sightings, as well as large herd sightings, will be reported to: | | |
|--|--------------|--|
| Daniel Kaludjak, GN, Wildlife Officer II | 867-645-8084 | |
| Johanne Coutu-Autut, GN Conservation Officer III | 867-645-8083 | |
| Issatik Hunters and Trappers Organization | 867-896-9944 | |

- **Breeding birds are not to be disturbed.** In consultation with the Whale Cove Hunters and Trappers Organization, nests of critical bird species will be identified for avoidance. If any employee or contractor comes across any active nests, they Nordgold (Northquest Ltd.) Pistol Bay Project

will to ensure that the nest is not disturbed. Coordinates are to be recorded on the wildlife sighting sheets and these coordinates are to be reported to Environment Canada. Moving or disturbing the nest is in contravention of the <u>Migratory Birds</u> Convention Act.

- The Peregrine Falcon has been identified as a species of Special Concern by the Committee on the Status of Endangered Wildlife in Canada. If any nests are found, A buffer must be maintained. A 1.5 km buffer is recommended for the peregrine falcon. Any nests discovered will be recorded and GPS coordinates provided to the applicable regulatory authorities.
- Sightings of wildlife will be recorded. Sightings of wildlife will be recorded by all
 employees and contractors to the Wildlife Monitor who will ensure the information
 is recorded on the wildlife sighting log. This information will be reported in the
 required annual reports to regulatory authorities.
- Aquatic Life will be protected. Working in and around waterbodies must be done in such a way that prevents disturbance to aquatic life and habitat. Waterlines must be properly placed and screened in accordance with the "Freshwater Intake Endof-Pipe Screen Guidelines" of DFO. No wastes are to enter any water-bodies. This includes any discharge from the exploration camp.
- All sumps, fuel caches and the camp must be located at least 31 meters from the high-water mark of any water body unless otherwise approved by the appropriate regulatory authority.
- Waste will be managed properly. Proper food storage and handling of cooking
 wastes will prevent problems with attracting wildlife. Food waste will be removed
 or incinerated daily and the ash taken to the Whale Cove dump on a regular
 basis. Nuisance wildlife will be reported immediately.
- **Firearms will only be carried for safety reasons.** Firearms may be carried only for safety reasons and only if such firearms are properly registered and stored in accordance with applicable legislation. All firearm discharges must be reported to the Project Manager.