

April 4, 2024

Mackenzie Valley Land and Water Board
7th Floor – 4922 48th Street
PO Box 2130
Yellowknife, NT X1A 2P6

Attention: Angela Love, Regulatory Specialist

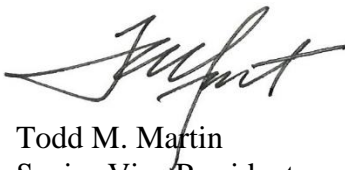
Dear Ms. Love,

Re: MV2023L2-0006 Board Direction, Engagement Plan Update

North American Tungsten Corporation Ltd. (“NATC”) is pleased to provide the enclosed revised document, *Engagement Plan*, further to issuance of MV2023L2-0006 and the related Board Direction of February 1, 2024, as well as additional Board Direction issued on March 11, 2024.

Should you have any questions regarding these revisions, feel free to contact the writer or Marianna Lee at 604.639.0845 or Marianna.lee@alvarezandmarsal.com.

Yours truly,
North American Tungsten Corporation Ltd.
by its Monitor, Alvarez & Marsal Canada Inc.
acting in its capacity as Monitor of NATC and not
in its personal capacity



Todd M. Martin
Senior Vice President

Enclosure



**ENGAGEMENT PLAN
CANTUNG MINE, NT
VERSION #3.1
PREPARED BY
NORTH AMERICAN TUNGSTEN CORPORATION LTD.**

Dated: March 31, 2024

SUMMARY

This Plan describes how NATC communicates and shares information with people interested in the project. It also describes what information is shared, how it is shared and when it is shared.

REVISION SUMMARY

Version	Date	Summary of Changes
<i>MV2023L2-0006</i>		
3.1	Mar 2024	<p>Revised to address Board Direction issued on Feb 1, 2024 and Mar 11, 2024:</p> <ul style="list-style-type: none"> • Sec 7.0 revised to include reporting related to annual document review; • Table 3 updated to include <ul style="list-style-type: none"> ○ engagement specific to annual document review; ○ notification in advance of risk reduction activities; <p>Revised to reflect responses to comments on version 3:</p> <ul style="list-style-type: none"> • Glossary and Acronyms table updated for consistency, with related revisions throughout; • Sec 5.0 revised to include consideration of engagement protocols; • Table 2 updated to include translation services; • Table 3 updated to include reporting specific to tailings related emergencies; <p>Sec 2.0, Sec 2.1, Table 1, Figure 1 updated for currency. Sec 2.3 revised for clarity. Sec 3.0 updated to included traditional place names. Minor formatting edits made throughout.</p>
<i>MV2023L2-0001, MV2023D0010</i>		
3	Mar 2023	<p>Revised throughout for consistency with other management plans, to reflect care and maintenance, new MVLWB policy, updated contacts, updated government and community affected parties, and for clarity and conciseness. Revised objectives to include closure planning and maintenance of the CWG. Added engagement with proximal communities and the public, MVLWB and Inspector.</p>
<i>MV2015L2-0003</i>		
2	Mar 2020	Revised to reflect Board Directive, Dec 10, 2018
1	Oct 2016	Initial Plan

WATER LICENCE MV2023L2-0006 CONFORMITY

Condition	Plan Section	Comment
Part B Item 13	Entire document	-

TABLE OF CONTENTS

1.0	INTRODUCTION	1
1.1	Background	1
1.2	Site Description	1
1.3	Goals and Objectives.....	2
1.4	Scope.....	2
1.5	Related Documents.....	2
1.6	Plan Management and Implementation.....	2
2.0	ROLES AND RESPONSIBILITIES.....	4
2.1	Engagement Lead.....	4
2.2	Engagement Support	4
2.3	Crown Engagement & Consultation.....	4
3.0	AFFECTED PARTIES	5
4.0	ENGAGEMENT PURPOSE.....	5
5.0	ENGAGEMENT METHODS	5
5.1	Communities Working Group	6
6.0	TRIGGERS FOR ENGAGEMENT	7
7.0	REPORTING & DOCUMENTATION	7
8.0	REFERENCES	9

LIST OF TABLES

Table 1: Related documents.....	4
Table 2: General Considerations for Effective Engagement.....	6
Table 3: Triggers for Engagement.....	8

LIST OF FIGURES

Figure 1: Site layout, Cantung Mine	3
---	---

GLOSSARY AND ACRONYMS

Term	Definition
°C	Degree Celsius
A&M	Alvarez & Marsal Canada Inc., Court-appointed monitor of NATC
Affected Parties	Interested and affected parties including Indigenous land users and rights holders, Territorial and Federal Government departments, proximal communities and the public
BC	British Columbia
cm	centimetre
C&M	<i>Care and Maintenance</i>
CCAA	<i>Companies' Creditors Arrangement Act</i>
CIRNAC	Crown-Indigenous Relations and Northern Affairs Canada
Care and Maintenance	The status of a mine when it undergoes a temporary closure
Company	North American Tungsten Corporation Ltd.
Court	The Supreme Court of British Columbia
Crown	Government of Canada
CWG	Communities Working Group
Engagement Lead	Designated A&M personnel responsible for carrying out the Engagement Plan
Federal Government	Government of Canada
ha	hectare
Indigenous Groups	Identified Indigenous land users and rights holders who may be interested in and/or affected by the Mine including: Acho Dene Koe First Nation; Dehcho First Nations; Kaska Dena First Nation; Liard First Nation; Łı́ıdlı́ Kúé First Nation; Métis Nation Local 52; Nahᓇᓄ Dehé Dene Band; Ross River Dena Council.
Inspector	An Inspector designated by the Minister under subsection 84(1) of the <i>Mackenzie Valley Resource Management Act</i>
km	kilometre
m	metre
mm	millimeter
Mine	Cantung Mine
Modification	A change, other than an expansion, that does not alter the purpose or function of a structure
Monitor	Alvarez & Marsal Canada Inc.
MVLWB	Mackenzie Valley Land and Water Board
NATC	North American Tungsten Corporation Ltd.
NT	Northwest Territories

Plan	Engagement Plan
SNP	Surveillance Network Program
Territorial Government	Northwest Territories

1.0 INTRODUCTION

North American Tungsten Corporation Ltd.'s (NATC or the Company) Cantung Mine (Mine) is located on the Flat River, approximately 275 km northwest of Nahanni Butte, 300 km north of Watson Lake, just east of the Yukon border in the Dehcho Region of the Northwest Territories (NT).

The Cantung Mine, which opened in 1962, is North America's largest tungsten producer. It was most recently operated by NATC, up until the fall of 2015 when mining and milling ceased and the site entered care and maintenance. On June 9, 2015, NATC filed for creditor protection under the *Companies' Creditors Arrangement Act* (CCAA) and Alvarez & Marsal Canada Inc. (A&M or the Monitor) was appointed as Monitor by the Supreme Court of British Columbia (the Court; BC).

This *Engagement Plan* (the Plan) has been prepared by NATC to identify Affected Parties and triggers for engagement, and to outline its approach to ongoing life of project engagement.

1.1 BACKGROUND

On June 9, 2015, NATC filed for creditor protection under the CCAA and A&M was appointed as Monitor by Court.

Subsequent to cessation of mining and operations at Cantung at or around November 16, 2015, the Monitor has managed the affairs of the Company pursuant to an Order of the Court. Funding of NATC's care and maintenance activities since November 2015 have been provided by Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC).

On November 18, 2015, the Government of Canada determined that the Mine is a New Site Requiring Remediation, as per section 6.28 of the *Devolution Agreement*. As such, the site is now a federal area under the *Mackenzie Valley Resource Management Act*, for which the Government of Canada is now responsible.

Prior to a decision by NATC to transition Cantung to permanent closure and remediation, NATC and the Monitor solicited third parties for any interest in a possible investment or acquisition of Cantung that would see a restart of Mine operations. In that regard, a sale and investment solicitation process was conducted by the Company and the Monitor in 2015 which did not result in a transaction. Subsequently, with the assistance of the Monitor, a re-marketing of the Cantung Mine and Mactung property (formerly owned by NATC) was undertaken by the Government of Canada and Government of the Northwest Territories during the period of July 2019 through March 2022. Despite interest from select interested parties, NATC and the respective governments did not identify or transact with a party to invest, acquire or otherwise partner with NATC to take a financial interest in the Mine with a possible restart of same.

In April 2022, NATC, with input from CIRNAC, decided to continue care and maintenance in the near term and transition the Mine towards permanent closure and ultimately, remediation.

1.2 SITE DESCRIPTION

The Mine site area occupies approximately 75 ha, held under surface lease by NATC. It is located within Treaty 11 Territory, the traditional territory of the Dehcho First Nations and is also within the Kaska Dena Council's asserted territory.

As illustrated in Figure 1, the Mine comprises both open pit and underground workings together with milling facilities and five tailings containment areas. The historic Tungsten townsite is located adjacent to the Mine and mill facilities on the west side of the Flat River at an elevation of 1,128 m, and includes historic residential, recreational and office/shop buildings, some of which remain in use.

The Flat River is located in a steep-sided valley with the valley bottom being approximately 500 m wide.

The valley rises to mountain peaks up to 2,750 m high. Climatic conditions in this area are typically sub-arctic with an average mean annual air temperature -4.0°C^1 . Blizzard conditions during January and February are frequent but usually of short duration and maximum snow depth in the valleys during the winter averages 127 cm. The snow-free season extends from mid-May to early October. Total annual precipitation averages 551 mm¹, with approximately half occurring as rain and half as snow.

The site is accessible by air, utilizing the existing airstrip, or by the Nahanni Range Road.

1.3 GOALS AND OBJECTIVES

The objectives of this Plan include:

- Obtaining input into short and longer-term compliance monitoring and management activities, as well as site risks and related mitigation measures, and closure planning;
- Maintaining a Communities Working Group (CWG) to strengthen relationships between parties and facilitate the exchange of scientific information and traditional knowledge relating to the Cantung Mine; and
- Engaging with site users and/or interested and affected parties to ensure site activities do not conflict with current and planned future land uses.

1.4 SCOPE

This Plan applies to ongoing life of project engagements with interested and affected parties including Indigenous land users and rights holders, Territorial and Federal Government departments, proximal communities and the public.

1.5 RELATED DOCUMENTS

The documents listed in Table 1 are related to, and should be considered when implementing this Plan, and may be updated from time to time.

1.6 PLAN MANAGEMENT AND IMPLEMENTATION

The Plan is effective upon approval. The Plan is reviewed annually by the Engagement Lead or designate and updated as needed and following issuance of new or amended authorizations to ensure alignment with relevant terms and conditions. When material changes occur, the updated document is provided to parties in accordance with Table 2.

A copy of this Plan is maintained on site in the administration office and in A&M's office in Vancouver.

¹ Record period of 2017-2022, Cantung Weather Station..



Figure 1: Site layout, Cantung Mine

Table 1: Related documents

Title	Author	Year	Relation to this Plan
<i>Mackenzie Valley Resource Management Act</i>	Government of Canada	1998	Enables the water licencing process
Water Licence	Mackenzie Valley Land and Water Board	2024	Identifies monitoring and reporting requirements
Engagement and Consultation Policy	Land and Water Boards of the Mackenzie Valley	2023	Outlines submission requirements for permittees and licensees pertaining to ongoing engagement with affected parties
Standard Outline for Management Plans	Land and Water Boards of the Mackenzie Valley	2021	Describes preferred format for Management Plans

2.0 ROLES AND RESPONSIBILITIES

NATC is responsible for the Mine, including implementation and management of this Plan. Contact information for NATC is provided below.

North American Tungsten Corporation Ltd.

c/o Alvarez & Marsal Canada Inc.

925 W. Georgia St.

Suite 902, Cathedral Place Building

Vancouver, BC V6C 3L2

Ph: (604) 638-7440

Contact: Todd M. Martin, Sr. Vice President

tmartin@alvarezandmarsal.com

or

Marianna Lee, Director

Marianna.lee@alvarezandmarsal.com

2.1 ENGAGEMENT LEAD

Engagement is coordinated and led by the Monitor on behalf of NATC. The primary contact for all engagements is Marianna Lee, or delegate. Marianna can be reached at marianna.lee@alvarezandmarsal.com or (604) 638-7440.

The Engagement Lead is also responsible for maintaining the engagement log and any related documentation, as well as current contact information for all interested and affected Parties.

2.2 ENGAGEMENT SUPPORT

Where required, engagements may be supported by on-site personnel, contractors and consultants.

2.3 Crown Participation

As the funder of Mine Care and Maintenance (C&M), CIRNAC participates in routine engagements related to the funding of the Mine.

The primary contact for Crown participation is Sam Kennedy. Sam can be reached at sam.kennedy@rcaanc-cirnac.gc.ca or (867) 669-2834.

3.0 AFFECTED PARTIES

Indigenous land users and rights holders, Territorial and Federal Government departments, proximal communities and the public may be considered Affected Parties. Affected Parties are identified through past regulatory processes and previous engagements, and include the following:

- Indigenous Groups
 - Acho Dene Koe First Nation;
 - Dehcho First Nations;
 - Kaska Dena First Nation;
 - Liard First Nation;
 - Łı́ıdlı́ K úę First Nation;
 - Métis Nation Local 52;
 - Nahąą Dehé Dene Band; and
 - Ross River Dena Council.
- Government of Canada, including
 - Parks Canada; and
 - CIRNAC Inspector.
- Government of the Northwest Territories
 - Department of Investment, Tourism and Industry
- Communities of Tthenáágó (Nahanni Butte), Łı́ıdlı́ K úę (Fort Simpson), Watson Lake; and
- Leaseholders.

NATC also relies on a collaborative and constructive working relationship with Mackenzie Valley Land and Water Board (MVLWB) staff to support licence- and permit-related aspects of its activities.

4.0 ENGAGEMENT PURPOSE

The goal of life of project engagement is to maintain an open and trusting relationship with affected parties so that everyone is informed and feels comfortable participating in discussions and providing their views on aspects of Mine activities.

Given that the Mine is in C&M with permanent closure planning underway, the purpose of engagement is typically related to either routine life of project matters, pre-application aspects or closure planning.

5.0 ENGAGEMENT METHODS

Engagement provides a foundation of trust and builds and maintains the relationships that are essential for effective information sharing.

NATC relies on a series of general considerations to support effective engagement, as outlined in Table 2. Where an Indigenous Group has its own engagement protocol, NATC endeavors to follow that

protocol and modify its engagement process to respect the preferred manner of engagement.

Life of project engagement involves use of a variety of methods including:

- Written notifications (fax, mail, e-mail);
- Phone calls;
- In person meetings;
- Virtual meetings;
- Teleconference;
- Presentations to communicate environmental compliance information;
- Written reports that explain results of project monitoring and management activities; and
- Site tours.

There are also a number of routine reports, submissions and updates that are shared through the MVLWB process, all of which are posted to the MVLWB's public registry where any party can access the information, participate in the review process and provide comments or questions to NATC.

5.1 COMMUNITES WORKING GROUP

NATC has established a CWG, comprised of one or more representatives from each of the Indigenous Groups identified above, and including participants from NATC, CIRNAC and the Government of the Northwest Territories. The CWG has been meeting regularly since 2017.

The purpose of the CWG is to facilitate information sharing between the Affected Parties and NATC to develop a better understanding of the activities, challenges and interests associated with management and closure of the Mine. The CWG is involved in both on-going and special project engagement initiatives.

Participants are appointed by their respective organizations and are responsible for contributing to Mine-related discussions and reporting back to their organization on the results of the working group meetings. Where possible, participation in the CWG is preferred to remain consistent over time in order to:

- Increase development of Mine-specific understanding over time;
- Build trust among the parties;
- Establish an effective process for working group meetings; and
- Ensure that valuable feedback is received.

The CWG typically meets virtually on a quarterly basis. Related documents are shared among the CWG and NATC by email or online through a file sharing application.

Table 2: General Considerations for Effective Engagement

Consideration	Desired Outcome
Pro-active engagement	Early identification and notification of project undertakings, whenever possible
Transparency and accountability	Sharing of information between and among parties, including any resulting recommendations, decisions and actions for/from each party
Cultural considerations	Appropriate design of engagement format and materials that considers the audience, including translation services where appropriate
Clear objectives and expectations	Communicate purpose, scope, options and limitations/challenges associated with various aspects of the project; understand each other's views
Representation	Allow affected parties to select who attends meetings, and provide meeting purpose and responsibilities of attendees to assist with the selection process
Documentation	Record feedback received from affected parties, including recommendations, concerns and any outstanding items; provide time for review and verification
Utilize existing processes	Rely on established, inclusive and transparent technical review and approvals process for items within the Water Licence and Land use Permits
Budget	Determine appropriate resources to enable meaningful participation
Review	Discuss effectiveness of engagement process and any suggested revisions; update plan, as required

6.0 TRIGGERS FOR ENGAGEMENT

As mentioned above, NATC meets with certain of the Affected Parties (i.e. the CWG) on a routine ongoing basis to share ideas and keep parties updated.

Additional engagements occur in relation to larger projects or events, such as a water licence renewal or a significant project milestone (e.g. a change in mine status). In this instance, engagement is carried out in advance of a submission or a substantial change; the nature of the related engagement is determined in discussion with relevant Affected Parties.

A more detailed description of triggers for engagement is provided in Table 3.

7.0 REPORTING & DOCUMENTATION

NATC keeps a meeting record of engagements to capture event logistics, participant names, an overview of the items discussed, a record of recommendations, decisions and commitments made and any follow up actions required. NATC shares a draft meeting record, solicits comments and issues a final version to participants.

NATC also maintains an engagement log to capture high-level details on each meeting held to support participation and commitment tracking as well as reporting.

Discussions with Indigenous Groups regarding annual review of plans, programs, studies, and manuals, as required in the water licence is summarized in the annual water licence report.

Table 3: Triggers for Engagement

Trigger	Purpose	Affected Party	Method
Routine project update	Provide an update of the C&M activities and environmental performance over the last year, and plans for the upcoming year	All Affected Parties	Annual face-to-face meetings with affected parties as requested
		CWG membership	Routine virtual meetings
Tailings-related emergency	In the event of a tailings-related emergency, inform Affected Parties of occurrence and corrective actions taken, planned or underway	CWG membership	Phone call, followed up by email to each Indigenous Group directly
		All other parties listed in this Plan	Phone or email
Unplanned occurrence or event i.e. spill, licence criteria exceedance	Inform Affected Parties of occurrence and corrective actions taken, planned or underway	CWG membership	Email or virtual meeting
		Inspector	Pursuant to water licence or Spill Contingency Plan
		MVLWB	
Routine submission to the MVLWB i.e. Monthly Surveillance Network Program (SNP) Report, Annual Report	Inform Affected Parties of monthly monitoring results	CWG membership	Email, unless otherwise indicated.
		Inspector	Pursuant to water licence
	Inform Affected Parties of proposed management plan updates arising from annual plan review, gather input, understand interests, incorporate feedback in advance of submission	MVLWB	
		CWG membership	Routine virtual meetings or email
Planned non-routine submission to the MVLWB i.e. Changes to management plans and SNP, Modification	Inform Affected Parties in advance of proposed changes under the existing licence or permit, gather input, understand interests, incorporate feedback	CWG membership	Email or virtual meeting initially, thereafter as indicated by the Affected Party
		Inspector	Pursuant to water licence
		MVLWB	
Planned non-routine submission to the MVLWB i.e. New application	Inform Affected Parties in advance of the application submission, provide supporting documents for review to the extent possible, gather input, understand interests, incorporate feedback	CWG membership	Email or virtual meeting initially, thereafter as indicated by the Affected Party
		Inspector	Pursuant to water licence
		MVLWB	
		Other Affected Parties	Email or written notice initially, thereafter as indicated by the Affected Party
Planned change in status, ownership or authority of the Mine	Inform Affected Parties in advance of proposed changed	CWG membership	Email or virtual meeting
		Inspector	Pursuant to water licence
		MVLWB	
Initiation and completion of closure planning studies	Inform Affected Parties in advance of program start, upon receipt of draft deliverable and throughout the study as needed. Gather input, understand interests, incorporate feedback	CWG Membership	Email or virtual meeting initially, followed by in-person workshop as needed and thereafter as indicated by the Affected Party
Commencement of risk-reduction programs	Provide advance notice of the start of risk reduction activities	CIRNAC Resource and Land Management	Email
Other	Various	All Affected Parties	As agreed to with the Affected Party

8.0 REFERENCES

Companies' Creditors Arrangement Act. R.S.C., 1985, c. C-36

Land and Water Boards of the Mackenzie Valley. 2021. Standard Outline for Management Plans. Available at https://mvlwb.com/sites/default/files/2021-06/LWB%20Standard%20Outline%20for%20Management%20Plans%20-%20Approved%20-%20Jun%2010_21_0.pdf

Land and Water Boards of the Mackenzie Valley. 2023. Engagement and Consultation Policy. Available at https://wlwb.ca/sites/default/files/2023-01/LWB%20Engagement%20and%20Consultation%20Policy%20-%20Dec%2022.pdf?_gl=1*mc20a5*_ga*NzI5NTA4MzM0LjE2NjM2OTQzNDc.*_ga_1YN4RQ50MS*MTY3NTQ3NjMzM4xMTkuMS4xNjc1NDc2MzQzLjAuMC4w*_ga_DM4CTC801Y*MTY3NTQ3NjMzM4xMTkuMS4xNjc1NDc2MzQzLjAuMC4w*_ga_WH73GNZLKK*MTY3NTQ3NjMzM4xMTkuMS4xNjc1NDc2MzQzLjAuMC4w*_ga_FFVRERZXBW*MTY3NTQ3NjMzM4xMTkuMS4xNjc1NDc2MzQzLjAuMC4w

Mackenzie Valley Resource Management Act. S.C. 1998, c. 25.