

GENERATION PGM

September 8, 2021

Marathon Joint Review Panel Secretariat
160 Elgin Street, 22nd Floor
Ottawa, ON K1A 0H3

Attention: Jason Patchell, Panel Manager
Marathon Palladium Project

Dear Mr. Patchell:

**Re: Generation PGM ("GenPGM") Marathon Palladium Project ("Project")
Biigtigong Nishnaabeg First Nation Technical Review Submission and
Confidentiality Undertaking and September 16, 2021 Session**

We are writing further to the Joint Review Panel ("JRP" or the "Panel")'s August 16, 2021 letter (Reference No. [916](#)) requiring all individuals who have access to Biigtigong Nishnaabeg's Technical Review Submission sign a Confidentiality Undertaking and subsequent correspondence regarding a confidential pre-hearing session on September 16, 2021.

Confidentiality Undertaking

The individuals who have signed the Confidentiality Undertaking on behalf of GenPGM, who agree to treat Biigtigong Nishnaabeg's Technical Review Submission as confidential, are listed in an Appendix. The executed Confidentiality Undertakings will be filed separately with the Panel.

September 16, 2021 Session

On September 1, 2021, the JRP issued a letter (Reference No. [924](#)) which states that the purpose of the confidential pre-hearing session on September 16, 2021 (the "**Session**") is for the Panel to obtain additional information and clarifications regarding Biigtigong Nishnaabeg's Technical Review Submission.

GenPGM respectfully requests the following additional information from the JRP regarding the Session:

- GenPGM respectfully requests that the JRP identify the additional information that it requires, as referenced in the JRP's September 1, 2021 letter, in order to allow the parties to appropriately prepare for the Session. If necessary, this information can be provided to Biigtigong Nishnaabeg and GenPGM on a confidential basis.

- GenPGM respectfully requests that the JRP circulate an agenda prior to the Session. While GenPGM understand that its presentation time may be limited to between five and fifteen minutes, GenPGM will endeavor to focus its available presentation minutes on the information required by the JRP and Biigtigong Nishnaabeg, as confirmed in the agenda.
- Finally, GenPGM has recently been advised that due to health and safety measures established by Biigtigong Nishnaabeg in relation to COVID-19, two or three representatives from GenPGM can attend the Session, with an additional two GenPGM representatives attending a live stream in the community. GenPGM respectfully requests confirmation from the Panel that similar health and safety participation limits will apply to the JRP and other parties attending at the Session, other than Biigtigong Nishnaabeg, per the Panel's health and safety protocol for indoor gatherings (Reference No. [918](#)).

If you have any questions or concerns, please do not hesitate to contact the undersigned.

Sincerely,

<Original signed by>

Tabatha R. LeBlanc

Manager of Sustainability

GENERATIONPGM

Appendix

Individuals who have signed Confidentiality Undertaking on behalf of GenPGM

- Drew Anwyll, GenPGM
- Gordon Lung, GenPGM
- Jamie Levy, GenPGM
- Kevin Sherlock, GenPGM
- Cathryn Moffett, GenPGM
- John McBride, GenPGM
- Chanelle Boucher, GenPGM
- Kerry Knoll, GenPGM
- Tabatha LeBlanc, GenPGM
- Phillip Wallford, GenPGM
- Paul Murphy, GenPGM
- Brian Fraser, Ecometrix
- Ron Nicholson, Ecometrix
- Jason Dietrich, Ecometrix
- Janeen Tang, Ecometrix
- Margarita Tzivaki, Ecometrix
- Nicholas Edmunds, Ecometrix
- Sarah Barabash, Ecometrix
- Jon Pounder, Stantec
- Christine Walsh, Stantec
- Paula Sdao, Stantec
- Chris Powell, Stantec
- George Hegmann, Stantec
- Sheldon Smith, Stantec
- Mark Shrimpton, Stantec
- Hilary Janes, Stantec
- Dr. Robert Foster, Northern Bioscience
- Sheila Daniel, Wood E&IS
- Dan Russell, Wood E&IS
- Heather Lindsay, Wood E&IS
- Amy Elliot, Wood E&IS
- Matthew Wilson, Wood E&IS
- Dale Klodnicki, Wood E&IS
- Craig Hall, Knight Piésold Ltd.
- Alex McIntyre, Knight Piésold Ltd.
- Jeremy Barretto, Cassels Brock & Blackwell LLP
- Meghan Rourke, Cassels Brock & Blackwell LLP