



REHABILITATION PLAN SHAAKICHIUWAANAAN MINING PROJECT

ENV0682-1501-00

PMET Resources Inc. – James Bay

March 24, 2026

NOTE: This Rehabilitation Plan was originally written in French. It has been translated into English with the assistance of the DeepL translation tool. In the event of any discrepancy, ambiguity, or difference in interpretation between the French and English versions, the French version shall prevail.



James Bay (Quebec)

REHABILITATION PLAN

SHAAKICHUWAANAAN PROJECT

ENV0682-1501-00



GCM Reference No.: 24-2164-0682

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Review
00

Broadcast
FINAL

Date
March 24, 2026

SUMMARY OF THE REHABILITATION PLAN

The Shaakichiuwaanaan mining property, owned by PMET Resources Inc. (PMET) and its Quebec subsidiary Innova Lithium Inc., is a lithium project currently at the development stage. The property is located northeast of Nemaska and east of Radisson. It is accessible via a road located approximately at kilometer 270 of the Trans-Taiga Highway.

Mining Activities

The only works currently underway on the Shaakichiuwaanaan property are mineral exploration activities. An exploration camp is located at kilometer 270 of the Trans-Taiga Road. An access road approximately 15 km long connects the exploration camp to the property. The mining project includes an open-pit mine, an underground mine with an access ramp and portal, an ore processing plant, two overburden stockpiles, two organic material stockpiles, two ore stockpiles (low-grade and high-grade), a low-risk waste stockpile, and a waste rock and tailings co-disposal stockpile designed with containment measures.

Planned Rehabilitation Work

The main rehabilitation steps following the mine's complete closure include the dismantling, by a certified contractor, of buildings and other surface infrastructure, as well as the regrading, scarification, and revegetation of the affected areas. The low-risk waste rock pile will be covered with soil and organic matter, then revegetated. The waste rock and tailings co-disposal pile, which contains material considered as potentially metal leaching, will be covered with a multi-layer system including a geomembrane, then covered with soil and organic matter before being revegetated by hydroseeding. Ore stockpiles that no longer contain material at the end of the mine's operating life will be characterized, scarified, and revegetated. The settling ponds will be emptied, backfilled, and revegetated; the dikes will be regraded, and the area revegetated, except for the ponds associated with the waste rock pile and co-disposal facility, for which the geomembranes will be removed, and a breach will be created in the pond dikes.

Timeline

The rehabilitation work described in the previous paragraph is expected to take place over four (4) years following the cessation of mining operations and the closure of the ore processing plant. Post-rehabilitation monitoring is planned over a period of five (5) years in order to comply with *Directive 019 for the mining industry*.

Total Rehabilitation Costs

The total cost of the rehabilitation work is estimated at CA\$249,102,400, including a 20% contingency.

An executive summary of the Rehabilitation Plan is presented in Appendix A.

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REVISION HISTORY

Revision					Comments (reason for revision)
Rev.	Prepared by	Verified by	Date	Revised sections	
-	W. Beauregard	S. Ouellet	March 20, 2026	-	In progress
00	W. Beauregard	S. Ouellet	March 24, 2026	-	Final

LIMITATIONS

GCM Enviro Synergies has prepared this Rehabilitation Plan for the Client, PMET Resources Inc., in accordance with the professional services agreement. For this mandate, GCM Enviro Synergies carried out its work based on rehabilitation studies and design concepts provided by third-party firms. The conclusions of these studies and the design concepts provided remain the sole responsibility of these third parties, and, as such, neither GCM Enviro Synergies nor the undersigned confirms the adequacy of these conclusions and concepts. GCM Enviro Synergies is responsible for integrating the findings of these studies and provided rehabilitation concepts into this revision of the Rehabilitation Plan, as well as for the elements under its mandate, including the evaluation of rehabilitation costs. GCM Enviro Synergies will notify the Client if it identifies any inconsistencies or evident risks associated with the selected rehabilitation concepts.

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1 INTRODUCTION

1.1 BACKGROUND

PMET Resources (PMET) is a mineral exploration company focused on the acquisition and development of mining projects containing base metals. In 2023, PMET established a wholly owned Quebec subsidiary, Innova Lithium Inc. (Innova), which is the registered owner of the project claims, including the flagship Shaakichiuwaanaan property. PMET is a publicly traded corporation listed on the Toronto Stock Exchange (TSX: PMET, ASX: PMT, OTCQX: PMETF, WB: R9GA). The company was incorporated in 2007 under the British Columbia *Business Corporations Act* (S.B.C. 2002, c. 57). Its head office is in Montreal, and PMET also maintains offices in Chisasibi, at the exploration camp north of the Shaakichiuwaanaan property, and in Australia.

As the Shaakichiuwaanaan project is subject to the environmental and social protection process established for the territory covered by Chapters 22 and 23 of the James Bay and Northern Quebec Agreement (JBNQA) (EQA, Chapter Q-2, Title II), PMET submitted, in November 2023, the proposed CV5 spodumene pegmatite mining project, then referred to as Corvette, to the Evaluation Committee (COMEV).

Following this submission, in April 2024, PMET received from the Ministry of Environment, Fight Against Climate Change, Wildlife and Parks (MELCCFP) the directives for preparing the Environmental and Social Impact Assessment (ESIA).

In January 2025, PMET filed an updated project notice with the COMEV, notably reflecting the adoption of the name Shaakichiuwaanaan for the project, in recognition of the wishes expressed by local communities for a project name that more accurately and culturally aligns with the territory in which it is located.

Under section 232.1 of the *Mining Act*, lithium ore mining activities are subject to the submission to the Ministry of Natural Resources and Forests (MRNF) of a Rehabilitation Plan and, in accordance with section 232.4 of the same Act, to the provision of a financial guarantee to cover the anticipated costs of the rehabilitation work set out in the plan.

Furthermore, Section 3.11 of the ESIA directive requires the proponent to include in its impact assessment the Rehabilitation Plan for the site in its impact assessment, as mandated by the *Mining Act*, and to submit it to the Environmental and Social Impact Review Committee (COMEX) in accordance with the regulations applicable to Northern Quebec and James Bay territory.

This document therefore constitutes the first version of the Rehabilitation Plan for the Shaakichiuwaanaan property.

1.2 OBJECTIVES

GCM Enviro Synergies Inc. (GCM Enviro) has prepared this Rehabilitation Plan for the Shaakichiuwaanaan site in accordance with the provisions of the *Mining Act* (R.S.Q., c. M-13.1) and the specifications of the *Guide de préparation du plan de réaménagement et de restauration des sites miniers au Québec* issued by the MRNF (2024). The rehabilitation measures planned for the end of the mine's operating life are designed to meet these requirements. The Rehabilitation Plan is structured around the following elements:

- A description of existing and planned site infrastructure;
- A description of planned activities;
- The planned protection, remediation, and rehabilitation measures;
- The post-rehabilitation monitoring program;
- Measures applicable in the event of a temporary suspension of operations;
- The emergency plan;
- The revegetation plan;
- The evaluation for rehabilitation costs;
- The rehabilitation work schedule;
- The evaluation of the required financial guarantee.

For ease of reference, all maps and layout plans cited in this Rehabilitation Plan are grouped and presented in Appendix B.

1.3 CONTENTS OF THE REHABILITATION PLAN

This Rehabilitation Plan includes all infrastructure that will be present at the Shaakichiuwaanaan site as part of the mining project.

The completed content validation grid for the Rehabilitation Plan is provided in Appendix C.

2 GENERAL INFORMATION

2.1 IDENTIFICATION OF THE APPLICANT AND STAKEHOLDERS

2.1.1 IDENTITY OF THE APPLICANT

PMET Resources Inc.

Mailing Address:

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Email: cmoffett@pmet.ca

2.1.2 CIDREQ NUMBER

The Quebec Enterprise Registry (CIDREQ) number for PMET Resources Inc. is 1 179 161 253.

2.1.3 RESOLUTION OF THE BOARD OF DIRECTORS

A certified true copy of a resolution of the Board of Directors of PMET Resources Inc., authorizing Cathryn Moffett, Vice President – Environment and Permits, to submit this application, is provided in Appendix D.

2.2 CONSULTANT ENGAGED

GCM Enviro Synergies Inc. (GCM Enviro) was retained by PMET to prepare this Rehabilitation Plan. A mandate letter from PMET to GCM Enviro is provided in Appendix E.

GCM Enviro Synergies Inc.

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2.3 SITE LOCATION

The Shaakichuwaanaan mining project is located approximately 240 km northeast of Nemaska and about 220 km east of Radisson in the James Bay region, within the territory administered by the Eeyou Istchee James Bay Regional Government (GREIBJ). The central coordinates of the projected mining site (NAD83 geodetic reference system, UTM Zone 18N) are:

- Latitude: 5 931 000 N.
- Longitude: 573 000 E.

Ground access to the site is possible from Radisson by successively travelling along the Billy-Diamond Road, the Trans-Taiga Road, and a four-season road connecting the mining site to Trans-Taiga Road at kilometer 270. The map in Appendix B1 shows the regional location of the mining property.

2.4 MINING PROPERTY

PMET holds 463 exclusive exploration claims grouped into eight (8) claim blocks: Corvette Main, Corvette East, FCI East, FCI West, Deca-Goose, Felix, JBN-57, and KCG (Figure 2-1). The Shaakichuwaanaan mining project, focused exclusively on the CV5 deposit, is located primarily on the FCI East claim block. A list of the claims associated with the Shaakichuwaanaan project is available in Appendix F. All mining claims on which the Shaakichuwaanaan project infrastructure will be established are shown on the map presented in Appendix B3.

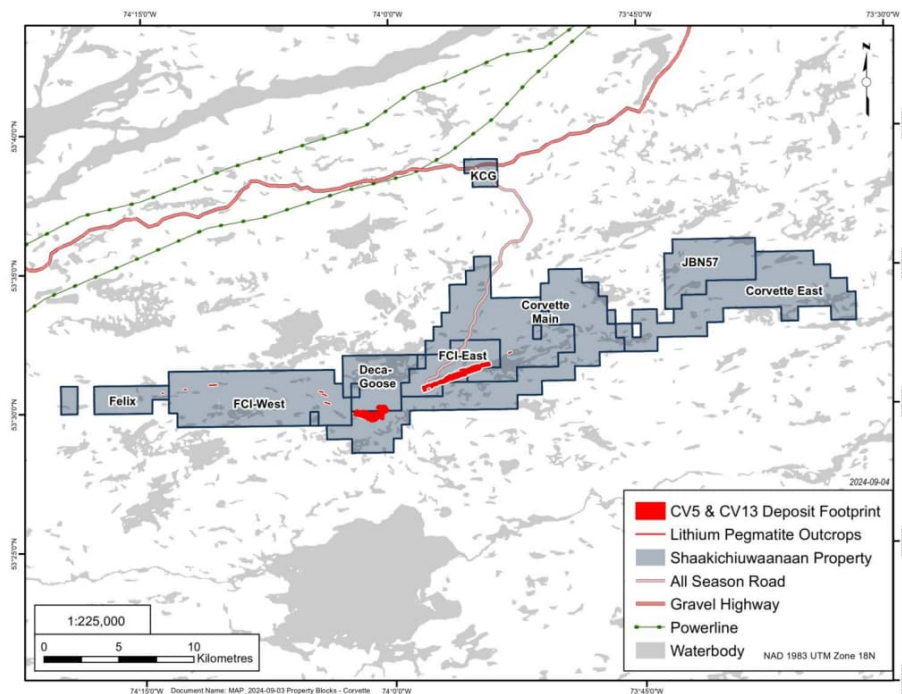


Figure 2-1 . Claim groups owned by PMET (BBA, 2024)

2.5 SITE HISTORY

The historical information provided below is largely drawn from the NI 43-101 technical report for the Shaakichiuwaanaan property prepared by G Mining Services in November 2025 (GMS, 2025).

Mineral exploration in the region began in the late 1950s and focused mainly on base and precious metal discovery. Early exploration identified several Cu-Au-Ag mineralized showings, including Tyrone T-9 and Smokycat-SO Lake, which are part of the current FCI West claim block.

From the late 1950s until 1997, exploration on the property was limited, consisting primarily of regional mapping campaigns conducted by the federal and provincial governments, as well as airborne magnetic and electromagnetic surveys.

In 1997, Virginia Gold Mines Inc. (Virginia) acquired a significant number of claims in the region, which fully covered the area of the current property. Exploration work carried out between 1997 and 2000 included several geophysical surveys, surface mapping, and prospecting. Numerous base and precious metal showings were discovered during that period. Surface exploration activities continued in the subsequent years, leading to the discovery of additional showings.

In 2001, Virginia conducted the first diamond drilling on the property. Drilling activities intensified between 2007 and 2013. During this period, a total of approximately 6,285 m of drilling was completed on various base and precious metal targets.

In 2016, Patriot Battery Metals¹, then operating as 92 Resources Inc., acquired claims corresponding to part of the current Corvette Main claim block. These claims were acquired in part following the mention of spodumene crystals in a pegmatite described during a 2006 exploration program conducted by Virginia Gold Mines Inc. Prior to this acquisition, no lithium-focused exploration had been conducted on the property.

Three main mineral exploration trends have been identified across the project area, extending primarily east to west: the Golden Trend (gold), the Maven Trend (copper, gold, silver), and the CV Trend (Li-Cs-Ta pegmatite or LCT). The Golden Trend is concentrated in the northern areas of the property, the Maven Trend in the southern areas, and the CV Trend lies “in between.” Historically, the Golden Trend has received the most attention in terms of exploration, followed by the Maven Trend. However, the identification of the CV Trend and the numerous LCT pegmatites discovered to date represent a previously unknown lithium pegmatite district, first recognized in 2016–2017 by Dahrouge Geological Consulting Ltd. and PMET.

Between 2016 and 2025, PMET continued to acquire claims and now holds 463 mining claims in the Shaakichiuwaanaan project area. PMET established its Quebec subsidiary, Lithium Innova Inc., in October 2023, which now holds all mining claims on the Shaakichiuwaanaan property.

¹ Patriot Battery Metals is now known as PMET Resources Inc. following a name change in September 2025.

2.6 MINERAL RESOURCES AND RESERVES

As part of the NI 43-101 technical report completed by G Mining Services in November 2025, mineral resources and reserves were estimated (GMS, 2025). The CV5 deposit contains indicated mineral resources of 101.8 Mt at a grade of 1.38% Li₂O and inferred resources of 13.9 Mt at 1.21% Li₂O, estimated based on open-pit and underground mining scenarios. Probable mineral reserves total 84.3 Mt at an average grade of 1.26% Li₂O. These reserves are divided between an open-pit operation of 49.2 Mt at 1.12% Li₂O and an underground operation of 35.1 Mt at 1.45% Li₂O.

Based on these proven and probable reserves defined in the feasibility study, the mine life is estimated at 19 years. Commercial production is scheduled to begin in 2030, bringing the end of the mine operation to 2049.

2.7 GEOLOGY AND MINERALOGY

The description of the geology and mineralogy of the property is taken from the NI 43-101 technical report completed in November 2025 (GMS, 2025).

The CV5 deposit covers a large portion of the Guyer Lake greenstone belt, considered part of the larger La Grande River greenstone belt. The deposit is dominated by volcanic and sedimentary rocks metamorphosed to the amphibolite facies. The property is underlain primarily by rocks of the Guyer Group (amphibolite, iron-bearing formation, intermediate to mafic volcanic rocks, peridotite, pyroxenite, komatiite, and felsic volcanic tuffs). The amphibolitic and metasedimentary rocks, which strike east-west and generally dip moderately to steeply to the south, are bounded to the north by the Magin Formation (conglomerate, wacke) and to the south by tonalite–granodiorite–diorite assemblage, along with metasediments of the Marbot Group (conglomerate, wacke). Several regionally extensive Proterozoic gabbro dikes also cross the property (Spirt Lake dikes, Senneterre dikes). The lithium pegmatites on the property, including at CV5 and CV13, are primarily hosted in amphibolites, metasediments, and, to a lesser extent, ultramafics.

The geological setting is primarily prospective for gold, silver, base metals, platinum group elements, and lithium, across several deposit types, including orogenic gold (Au), volcanic massive sulphides (Cu, Au, Ag), ultramafics-associated mineralization (Au, Ag, platinum group elements, Ni, Cu, Co), and LCT pegmatites.

The CV trend is currently recognized as a corridor approximately 1 km wide and over 25 km long, hosting numerous distinct LCT pegmatites occurrences, generally extending in an east-west direction across the central portion of the main claim block. It is interpreted that this trend extends across the entire property (approximately 50 km), although vast areas remain untested for pegmatites. The pegmatites along this trend may outcrop as isolated, whaleback ridges or as relatively flat, low-relief features.

To date, eight (8) distinct groups of mineralized pegmatites have been discovered along the CV trend on the Shaakichiuwaanaan property: CV4, CV5, CV8, CV9, CV10, CV12, CV13, and CV14. Each of these groups comprises several closely spaced mineralized pegmatite outcrops oriented along the same local trend. The current project focuses exclusively on the CV5 group.

LCT -type mineralization on the property occurs within quartz-feldspar pegmatites, which may outcrop as prominent whaleback ridges or as lower-relief features. The pegmatite is often very coarse-grained and pale in colour, with darker sections generally composed of smoky quartz, and occasionally muscovite and tourmaline, as well as lighter sections composed mainly of feldspars (albite and microcline). Minor and trace accessory minerals may include beryl, chlorite, tantalite, lepidolite, and apatite.

Spodumene ($\text{LiAlSi}_2\text{O}_6$) is the dominant lithium-bearing mineral identified in all documented occurrences on the property. The spodumene crystals vary in size from centimetric to metric, reaching lengths of up to 2 m in drill cores at CV5. Crystal colour ranges from cream to light gray-green in the CV5 pegmatite zone, and to more whitish hues in the western pegmatites (CV8, CV9, CV10, and CV12). The spodumene mineralization is often associated with smoky quartz; however, it can also occur as isolated crystals in feldspar-rich pegmatites.

The lithium mineralization discovered to date is limited to the CV trend. The central zone of the trend included the CV5 spodumene pegmatite, approximately 4.6 km in strike length, and the CV13 spodumene pegmatite, approximately 2.3 km long, as defined by drilling, and separated by roughly 2.9 km of prospective but untested ground. Both CV5 and CV13 remain open along strike and at depth.

At CV5, the majority of the mineral resources are hosted within a single main spodumene pegmatite dike, with a true width ranging from less than 10 m to over 125 m, flanked on either side by several subordinate, subparallel dikes. At CV13, mineralization is defined by a series of moderately north-dipping, parallel spodumene pegmatite bodies. Both CV5 and CV13 contain significant high-grade zones (Nova and Vega, respectively) located near the base of their respective pegmatite lenses. These zones are traced over considerable strike lengths by multiple drill intersections ranging from 2 m to 25 m thick at CV5 and from 2 m to 10 m thick at CV13, each with broader mineralized envelopes grading $> 2\% \text{Li}_2\text{O}$, with local intervals exceeding $5\% \text{Li}_2\text{O}$.

Four (4) main host rock lithologies have been identified: amphibolite, metasediments, pegmatite, and ultramafic rocks.

2.8 GEOCHEMICAL CHARACTERIZATION

PMET retained Vision Geochemistry (Vision) to conduct a geochemical characterization study of the ore, waste rock, and mine tailings that will be generated during the mining of the CV5 pegmatite deposit on the Shaakichiuwaanaan property (Vision, 2025). The analytical results of this study were also interpreted by AtkinsRéalis (Atkins, 2026) in accordance with *the Guide for the Characterization of Mine Tailings and Ore* (GCRMM) (MELCC, 2020). These studies are provided in Appendix G. A summary of the information contained in these studies is presented in the following subsections.

2.8.1 ANALYTICAL PROGRAM

A total of 356 samples were analyzed, which is considered representative of the anticipated tonnages of mine materials (Atkins, 2026a), and were subjected to static tests. Table 2-1 presents a summary of the number of samples analyzed for each static test by type of mining material and lithology.

Table 2-1 . Number of samples for each static test by lithology and mining material

Mining material	Total number of samples	ABA	Aqua Regia	SPLP and CTEU-9	TCLP
Waste rock	316	316	316	316	112
Amphibolite	128	128	128	128	41
Metasediments	101	101	101	101	50
Pegmatite	33	33	33	33	13
Ultramafic rocks	54	54	54	54	8
Ore	25	25	25	25	8
Mining waste	13	13	13	13	2

Table 2-2 presents a summary of the number of humidity cells and column tests carried out for kinetic testing by mine material type and lithology. The humidity cell tests provide 100 weeks of data. Column tests on tailings account for a total of 20 weeks of data, while column tests on waste rock were monitored over 1 year (Atkins, 2026).

Table 2-2 . Number of samples for each kinetic test by lithology and mining material

Mine material	Humidity cells	Column tests
Waste rock	14	9
Amphibolite	6	3
Metasediments	3	2
Pegmatite	2	1
Ultramafic rocks	3	2
Waste rock mixture	0	1
Ore	2	0
Mining waste	0	6

2.8.2 PETROGRAPHIC, PHYSICAL, AND CHEMICAL DESCRIPTION OF MINE MATERIALS

Table 2-3 below summarizes the mineralogical composition of the mine materials analyzed using X-ray diffraction (XRD), as well as a list of chemical elements exceeding Criterion A in the samples

analyzed. The mine materials were also analyzed using the TIMA method. The TIMA analytical results are available in Tables 4-2 and 4-3 of the technical memorandum prepared by Atkins (2026a) and attached as Appendix G.

Table 2-3 . Mineralogical and chemical composition of the different mine materials in the Shaakichiuwaanaan project (Atkins, 2026a)

% by mass	Amphibolite (n=128)	Metasediments (n=101)	Ultramafic (n=54)	Pegmatite (waste rock) (n=33)	Pegmatite (ore) (n=25)
Major minerals (>10%)	Plagioclase Amphiboles	Quartz Plagioclase	Phlogopite Amphiboles	Quartz Plagioclase	Quartz Plagioclase Spodumene
Minor minerals (between 1 and 10%)	Quartz Microcline Chlorite Calcite Muscovite	Biotite Chlorite Muscovite Spodumene K-feldspar	Albite Muscovite Chlorite Magnetite Talc	Muscovite Microcline	Muscovite Microcline
Trace minerals (<1%)	Fluorite Magnetite	Tourmaline Magnetite Talc	Quartz Graphite	Spodumene Tourmaline Pollucite Beryl Chlorite Biotite Apatite	Tourmaline Pollucite Beryl Chlorite Biotite
Metals > Criterion A	As (98), Cu (98), Ni (36), Cr (9), Sn (7), Co (3), Cd (2), Pb (2), Zn (2), Ag (1), Ba (1), Hg (1)	As (70), Cu (18), Ni (12), Sn (12), Cr (8), Zn (6), Cd (5), Ag (3), Pb (3), Co (2), Mn (2), Ba (1), Hg (1)	As (54), Cr (53), Ni (53), Co (35), Cu (24), Sn (5), Ag (1), Cd (1), Mo (1), Pb (1), Zn (1)	As (25), Cr (4), Cu (3), Sn (3), Ni (1), Pb (1)	As (22), Sn (4), Cr (3), Ag (1)

2.8.3 RESULTS OF STATIC AND KINETIC TESTS

Table 2-4 presents a summary of the results of tests carried out to determine the acid generation potential (PAG) of mine materials from the Shaakichiuwaanaan site. Table 2-5 summarizes the results of static tests (acid generation potential and leaching potential) conducted on mine materials from the site.

Table 2-4 . Summary of the results of tests to determine the acid generation potential (AGP) (from Atkins, 2026)

Lithologies	Number of samples	Median total sulfur (%)	Number of NPAG samples	Number of PAG samples	Overall NPR
Amphibolite	128	0.14	112	16	5.3
Ultramafic	54	0.07	51	3	8.8
Metasediments	101	0.18	65	36	2.4
Pegmatite	33	0.01	31	1	31.5
Spodumene pegmatite	25	0.01	24	1	14.0
Mining waste	9	0.02	9	0	15.7

Based on the 350 samples analyzed through static tests, as well as the column tests and humidity cell tests conducted, the following observations were reported (Atkins, 2026a):

- Sulphide contents are generally low, particularly in ultramafic lithology, pegmatite (waste rock), pegmatite (ore), and mine tailings;
- Total carbon contents are generally low across all characterized mine materials;
- The overall Neutralization Potential Ratio (NPR) of the mine materials varies between 2.4 (metasediments) and 31.5 (waste pegmatite);
- The acid generation potential (PGA) of metasediments, based on static tests, is more uncertain, as this lithology has the lowest overall NPR;
- Only three (3) of the 15 humidity cells exhibit low-level acid generation, namely one amphibolite cell, one metasedimentary cell, and one ultramafic cell. The other cells did not show any tendency toward acid generation;
- All column tests on waste rock produced leachates that evolved from “slightly alkaline” to around neutrality at the end of the test. Leachate acidity remained close to the detection limit (2–4 mg/L), demonstrating the availability of neutralizing minerals to counter acid generation.

All lithologies were classified as non-acid-generating. Large-scale tests are recommended to better understand the geochemical behaviour of metasediments, which remain the lithology with the highest potential for acid generation.

Table 2-6 presents a summary of the kinetic test results, indicating the number of weekly exceedances recorded per potential contaminant and per humidity cell or column.

Table 2-5 . Static test results by lithology and mine material

Material/Lithology	Total number of samples	Number of PAG samples in the ABA test [percentage of total number of samples]	Number of samples exceeding the criterion ¹ in the TCLP test (element) [percentage of total number of samples]	Number of samples exceeding the criterion ² in the SPLP test (element) [percentage of total number of samples]	Number of samples exceeding the criterion ² in the CTEU-9 test (item) [percentage of total number of samples]
Waste rock (amphibolite)	128	16 [13%]	0 [0%]	<p>121 (Al) [95%] 2 (As) [2%] (12 samples also exceed the most restrictive criterion between D019 and REMMMD) 3 (Cu) [2%] 5 (Zn) [10%]</p>	<p>97 (Al) [76%] 26 (As) [20%] (62 samples also exceed the most restrictive criterion between D019 and REMMMD) 1 (Cd) [1%] 37 (Cu) [29%] 7 (Fe) [5%] (8 samples also exceed the most restrictive criterion between D019 and REMMMD) 69 (Li) [54%] 1 (Pb) [1%] 20 (Sb) [3%] 1 (U) [1%] 1 (V) [1%]</p>
Waste rock (metasediments)	101	36 [36%]	0 [0%]	<p>89 (Al) [88%] 1 (As) [1%] (5 samples also exceed the most restrictive criterion between D019 and REMMMD) 2 (Cd) [8%] 4 (Cu) [4%] 1 (Fe) [1%] 1 (Sb) [1%] 2 (Zn) [2%]</p>	<p>84 (Al) [83%] 16 (As) [16%] (37 samples also exceed the most restrictive criterion between D019 and REMMMD) 1 (Be) [1%] 2 (Cd) [2%] 34 (Cu) [34%] 12 (Fe) [12%] (15 samples also exceed the most restrictive criterion between D019 and REMMMD) 8 (Li) [32%] 1 (Mn) [1%] 5 (Pb) [5%] 9 (Sb) [9%] 1 (U) [1%] 2 (V) [2%] 3 (Zn) [3%]</p>

Material/Lithology	Total number of samples	Number of PAG samples in the ABA test [percentage of total number of samples]	Number of samples exceeding the criterion ¹ in the TCLP test (element) [percentage of total number of samples]	Number of samples exceeding the criterion ² in the SPLP test (element) [percentage of total number of samples]	Number of samples exceeding the criterion ² in the CTEU-9 test (item) [percentage of total number of samples]
Waste rock (pegmatite)	33	1 [3%]	0 [0%]	<p>28 (Al) [85%] (1 sample also exceeds the most restrictive criterion between D019 and REMMMD for arsenic and iron)</p> <p>4 (Be) [12%] 4 (Cu) [12%] 1 (Pb) [3%] 2 (U) [6%] 3 (Zn) [9%]</p>	<p>33 (Al) [100%] 24 (As) [73%] (31 samples also exceed the most restrictive criterion between D019 and REMMMD) 13 (Be) [39%] 19 (Cu) [58%] 2 (Fe) [6%] (3 samples also exceed the most restrictive criterion between D019 and REMMMD) 8 (Li) [24%] 3 (Pb) [9%] 2 (Sb) [6%] 21 (U) [64%] 1 (V) [3%] 1 (Zn) [3%]</p>
Waste rock (ultramafic)	54	3 [6%]	2 (As) [4%] ³	<p>12 (Al) [22%] 17 (As) [31%] (36 samples also exceed the most restrictive criterion between D019 and REMMMD) 1 (Sb) [2%]</p>	<p>8 (Al) [15%] 50 (As) [93%] (53 samples also exceed the most stringent criterion between D019 and REMMMD) 13 (Cu) [24%] 5 (Fe) [9%] (6 samples also exceed the most restrictive criterion between D019 and REMMMD) 21 (Li) [39%] 36 (Sb) [67%] 8 (Ni) [15%] (1 sample also exceeds the most restrictive criterion between D019 and REMMMD)</p>
Ore (spodumene pegmatite)	25	1 [4%]	0 [0%]	<p>12 (Al) [48%] (4 samples also exceed the most restrictive criterion between D019 and REMMMD for arsenic)</p> <p>2 (Be) [8%] 3 (Cu) [12%] 2 (Zn) [8%]</p>	<p>25 (Al) [100%] 19 (As) [76%] (25 samples also exceed the most restrictive criterion between D019 and REMMMD) 7 (Be) [28%] 6 (Cu) [24%] 15 (Fe) [60%] (15 samples also exceed the most restrictive criterion between D019 and REMMMD) 25 (Li) [100%] 10 (Sb) [40%] 19 (U) [76%]</p>

Material/Lithology	Total number of samples	Number of PAG samples in the ABA test [percentage of total number of samples]	Number of samples exceeding the criterion ¹ in the TCLP test (element) [percentage of total number of samples]	Number of samples exceeding the criterion ² in the SPLP test (element) [percentage of total number of samples]	Number of samples exceeding the criterion ² in the CTEU-9 test (item) [percentage of total number of samples]
Mining residues	9	0 [0%]	0 [0%]	5 (Al) [56%] (3 samples also exceed the most restrictive criterion between D019 and REMMMD for arsenic) 3 (Cu) [33%] 2 (Zn) [22%]	8 (Al) [89%] 9 (As) [100%] (all 9 samples also exceed the most restrictive criterion between D019 and REMMMD) 5 (Cu) [56%] 5 (Li) [56%] 5 (Sb) [56%] 7 (U) [78%] 2 (Zn) [22%]

1. The criterion used is that in Table 1 of Appendix 1 of *Directive 019 on the Mining Industry*.
2. The criterion used is the Surface Water Resurgence (RES) criterion from Annex 7 of *the Intervention Guide – Soil Protection and Contaminated Sites Rehabilitation*, specifically the surface water quality criterion for the protection of aquatic life – acute effect (CVAA). This criterion was calculated assuming a dissolved organic carbon (DOC) concentration of 5 mg/L, a pH of 6, and a hardness of 5 mgCaCO₃/L.
3. Two ultramafic rocks samples classified as NPAG, selected from the drill core database (DHDB) due to their high arsenic content according to sodium peroxide analyses, exhibited arsenic concentrations in TCLP tests above the D019 threshold for arsenic (Vision, 2025).

Table 2-6 . Kinetic test results by humidity cells and columns (Vision, 2025)

Humidity cell (CV5-WR-HCT) / Column ID (CV5-CL)	Type of material S: Waste rock M: Ore R: Tailings	Number of weeks with exceedances by potential contaminant, relative to the applicable criterion, for 100 weeks of humidity cell testing and 20 weeks of column testing								
		Sb	As		Cd	Cu	Li	Ni	U	Zn
		CVAA	CVAA	REMMMD / D019	CVAA	CVAA	CVAA	CVAA	CVAA	CVAA
CV5-WR-HCT-2	S: Amphibolite	0	0	0	0	0	0	0	0	0
CV5-WR-HCT-5	S: Amphibolite	0	15	64	0	1	0	0	0	0
CV5-WR-HCT-14	S: Amphibolite	0	0	4	0	0	0	0	0	0
CV5-WR-HCT-22	S: Amphibolite	0	3	48	0	1	0	0	0	0
CV5-WR-HCT-33	S: Amphibolite	0	0	0	0	0	0	0	0	0
CV5-WR-HCT-36	S: Ultramafic	57	72	73	0	1	0	5	0	0
CV5-WR-HCT-39	S: Metasediments	0	0	0	0	0	0	0	0	0
CV5-WR-HCT-50	S: Metasediments	2	0	0	11	1	0	3	0	13
CV5-WR-HCT-56	S: Metasediments	0	0	0	0	1	0	0	0	0
CV5-WR-HCT-59	S: ultramafic	0	24	62	0	1	0	4	0	0
CV5-WR-HCT-62	S: ultramafic	63	70	73	0	0	0	1	0	0
CV5-WR-HCT-64	S: Pegmatite	0	1	5	0	2	0	0	2	0
CV5-WR-HCT-69	S: Pegmatite	0	0	3	0	2	0	0	7	0
CV5-WR-HCT-74	M: Ore	0	3	5	0	3	1	0	3	0
CV5-WR-HCT-76	M: Ore	0	0	0	0	2	0	0	1	0
CV5-CL-1	R: Floats	0	4	9	0	2	0	0	4	0
CV5-CL-2	R: Middlings	1	11	11	1	0	0	0	2	0
CV5-CL-3	R: Magnetics	10	11	11	0	0	0	0	0	0
CV5-CL-4	R: Bypass	6	11	11	0	2	3	2	10	1
CV5-CL-5	R: Master Composite	6	11	11	0	1	2	0	5	0

Based on the 350 samples analyzed using static testing, as well as the column tests and humidity cell tests conducted, the following observations were made (Atkins, 2026a):

- Arsenic is one of the elements of interest in terms of leaching potential, along with copper, chromium, and nickel;
- The CTEU-9 leaching tests indicate potential arsenic mobilization under the conditions of these tests;
- The SPLP tests show a more limited number of exceedances;
- The metals exceeding Criterion A and the Surface Water Resurgence (RES) criterion are arsenic for all lithologies; copper for amphibolite, metasediments, and ultramafics; chromium for ultramafics and mine tailings; and nickel for ultramafics.

All lithologies were classified as leachable, with the exception of waste pegmatite, for which additional testing is recommended to confirm its leachable nature, although potential has been identified.

2.8.4 INTERPRETATION AND CLASSIFICATION OF MINE MATERIALS

Based on the geochemical test results, the various mine materials were classified into the different categories described in the MELCCFP's *Guide de caractérisation des résidus miniers et du minéral (GCRMM)* (Atkins, 2026a). Table 2-7 Table 2-7 presents this classification.

Table 2-7 . Classification of mine materials from the Shaakichiuwaanaan site (Atkins, 2026a)

Mine material	Classification according to the <i>GCRMM criteria</i>
Amphibolite	Leachable for As, Cd, and Sb, non-acid-generating
Metasediments	Leachable for As, non-acid-generating
Ultramafic rock	Leachable for As and Cd, non-acid-generating
Pegmatite (waste rock)	Leachable for As, Cd, and Cu, non-acid-generating
Pegmatite (ore)	Potentially leachable for As and Li, non-acid-generating
Mine tailing	Leachable for As, Li, and U, non-acid-generating

2.8.5 HIGH-RISK MATERIALS

None of the project's mine materials are classified as "high-risk" according to GCRMM criteria (Atkins, 2026a).

2.8.5.1 RADIOACTIVITY POTENTIAL

The preliminary assessment of the radioactivity potential of the project's mine materials suggests that they are unlikely to be classified as radioactive. This statement must, however, be confirmed by conducting tests to calculate the S radiation coefficient, including all isotopes required under the GCRMM (Atkins, 2026a).

2.8.6 MINING MATERIAL SEGREGATION PROTOCOL

The Vision report (2025) presents a segregation protocol for waste rock based on a control criterion of a maximum arsenic concentration of 30 ppm and a maximum total sulfur content of

0.30%. Based on this segregation protocol, it was assumed for the design of the stockpile areas that waste rock with arsenic and sulfur concentrations below these thresholds would be considered low risk. The technical design of the segregation approach is presented in Section 2.9.5 of the Vision report (2025) (Appendix G).

2.9 VARIOUS AUTHORIZATIONS

Table 2-8 lists the permits and authorizations obtained for the Shaakichiuwaanaan property as of the date this Rehabilitation Plan was prepared.

Table 2-8 . Permits and authorizations obtained to date for the Shaakichiuwaanaan property

Permits	Reference No	Date received
Permits and applications submitted to the MELCCFP		
Exploration camp – Domestic wastewater treatment	7610-08-01-70086-21 Transfer from: 7610-08-01-70086-31	January 29, 2024
Domestic wastewater treatment at the Corvette Lithium exploration camp	Amendment to: 7610-08-01-70086-21	December 16, 2024
Exploration Camp – Groundwater Withdrawal	7610-10-01-70562-22	May 3, 2024
Exploration Camp – Drinking Water Treatment Facility	May 3, 2024	May 3, 2024
Project Notice	N/A	Filed in November 2023
Guidelines for the Preparation of the Environmental and Social Impact Assessment (ESIA)	3214-14-072	Issued in February 2024
Revised Project Notice	N/A	Filed in January 2025
Applications submitted to the MRNF		
Permit for the construction of an access road to the mining site	3030483	November 21, 2022
Applications for municipal permits (exploration camp)		
Water withdrawal	2023-0068	June 12, 2023
Modular water treatment building	2024-0095	July 18, 2024
Megadome building for equipment maintenance	2024-0096	July 18, 2024
Wastewater treatment plant building	2024-0097	July 18, 2024
Office and storage building for drillers	2024-0098	July 18, 2024
Office and storage building for workers	2024-0099	July 18, 2024
Drill core storage	2025-0004	February 28, 2025

3 PROJECT DESCRIPTION

3.1 CURRENT AND FUTURE MINING ACTIVITIES

The Shaakichiuwaanaan mining project involves the development of the CV5 spodumene pegmatite deposit through open-pit and underground mining, as well as the processing of the ore to produce spodumene concentrate using crushing, dense media separation (DMS), and magnetic separation processes. The project’s operating life is estimated at 19 years, and the mineral reserves to be mined during this period are estimated at 84.3 Mt (GMS, 2025). The objective is to produce 802 kt of spodumene concentrate per year, or approximately 2,191 tons per day at a grade of 5.5% Li₂O.

The mine’s maximum production capacity is 23 Mt of material moved (waste rock and ore) per year. This figure can be broken down into a maximum of 5.1 Mt of ore to feed the ore processing plant, or approximately 14,000 metric tons per day (mt/d)², and a maximum of 17.9 Mt of waste rock, or approximately 49,000 mt/d. Mine tailings leaving the plant will be produced at an average daily rate of 11,500 mt/d. The quantities of overburden and topsoil to be stockpiled at the site are estimated at 8.01 Mm³(approximately 14.02 Mt) and 2.2 Mm³(approximately 3.15 Mt) (GMS, 2025). The quantities of waste rock and mine tailings to be stored at the site are estimated at 77.2 Mm³(155.2 Mt, including waste rock to be disposed of in the pit) and 31 Mm³ (54 Mt above ground) (GMS, 2025). A portion of the mine tailings is planned to be reused for underground backfilling; this portion is estimated at 10.1 Mm³ (17.1 Mt) (GMS, 2025).

The estimated footprint of the area that will be used or disturbed by mining activities is presented at Table 3-1 . The location of the various sites can be viewed on the general site drawing provided in Appendix B2.

Table 3-1 . Areas used or disturbed by mining activities

Area	Area (m ²)
Industrial zone, infrastructure, and access roads	856,000
Stockpile areas (tailings, co-placement, overburden, etc.)	3,900,000
Ponds	448,000
Open pit	1,138,000
Total	6,343,000

Table 3-2 presents the schedule for site preparation work and the start of mining operations at the Shaakichiuwaanaan mine site. The timeline for the development of the various infrastructure components is preliminary and will be refined as the project progresses.

² Calculated over 365 days.

Table 3-2 . Sequence and duration of project-related work

Implementation stages	Start	End
Site preparation (excavation/backfilling)	Early 2028	May 2030
Installation of ventilation ductwork + heating system	2029	2032
Construction of surface buildings	Early 2028	March 2032
Construction of storage areas	2028	2030
Establishment and use of stockpiles (ore, waste rock, transfer)	2028	2049
Operation of the Shaakichiuwaanaan Mine (open pit)	June 2030	2049
Operation of the Shaakichiuwaanaan Mine (underground mine)	March 2032	2049

3.2 NATURE OF MINING OPERATIONS

3.2.1 OPEN-PIT MINING

The open-pit mining project will be developed in two phases. The first phase consists of mining an initial portion of the open pit (West Pit), which requires the construction of a dike³ at Lake 01, as the deposit is located beneath it.

The second phase involves expanding the pit eastward to mine the East Pit. This phase requires the construction of a second main dike, consisting of four (4) separate sections, east of the first dike in order to drain a larger area of the lake. The first dike will be dismantled during operations to allow continued mining of the East Pit.

The pit access ramps and haul roads are designed to accommodate 140-ton trucks. The design includes a width of 28.6 m for two-way traffic and 20.6 m for single-lane traffic at the bottom of the pit, a maximum grade of 10% and including 1.53-m-high safety berms, and a 1.0-meter drainage ditch with a 2% cross-slope (GMS, 2025). Geotechnically, the pit is divided into sectors based on lithology. Stability parameters vary by sector, with bench angles ranging from 40° to 75°, inter-ramp angles ranging from 32° to 55°, and safety berm widths ranging from 8.5 m to 12 m (GMS, 2025). To ensure the highwall stability, widened geotechnical berms (approximately 16 m) are incorporated at 160-meter vertical intervals, and a 10-meter transition bench is constructed at the overburden-bedrock contact.

Open-pit mining is expected to be conducted over a period of 17 years, including two (2) years of pre-production. The mining rate will gradually increase to a maximum of 23 Mt/year. The maximum depth of the pit is estimated at 200 to 225 m, and the final pit footprint is expected to cover approximately 920,000 m².

³ The terms “dike” and “embankment” are used interchangeably in the feasibility studies by Atkins Realis (2026b) and GMS (2025). Only the term “dike” is used in this document.

At the end of pit operations, a portion of the non-leachable and non-potentially acid-generating waste rock will be returned to the bottom of the pit, representing approximately 29.6 Mt of material (GMS, 2025).

A site plan showing the benches and access routes to the pit is provided in Appendix B2. Cross-sections of the pit are presented in the geotechnical stability study included in Appendix J (Alius, 2026).

3.2.1.1 CONSTRUCTION OF DIKES AT LAKE 01

Water-retention dikes are required to safely mine the pit areas located beneath the current footprint of Lake 01 by diverting water northward. Construction of these structures is phased to align with mine development: a initial dike will be built to isolate the West Pit, including a section extending onto dry land to prevent any bypassing during flood conditions. Subsequently, a second dike consisting of four (4) sections will be constructed east of the first structure to allow the expansion of operations toward the East Pit.

These dikes are designed with a robust cross-section using geochemically inert rockfill, the source of which remains to be confirmed. The internal structure is segmented, with a core composed of finer crushed stone to facilitate the installation of a central metal sheet pile wall that ensures watertightness, surrounded by a rockfill stability zone. The top of the watertight wall is levelled at an elevation of 378.1 m, then covered with 0.3 m of foundation material to reach a final crest elevation of 378.4 m (GMS, 2025). This elevation provides a minimum freeboard of 1.5 m above the Maximum Probable Flood (MPF) (GMS, 2025). The structures have a crest width of 6.0 m and 3H:1V slopes on both upstream and downstream sides, reinforced with 6-meter-wide toe berms (GMS, 2025).

The long-term stability of these structures depends on rigorous preparation of the foundations, involving the complete removal of loose lake sediments (silt and sand) from the embankment footprint, either by dredging or by mechanical displacement during the riprap placement. Construction will be carried out using a push method from the shoreline toward the lake, with turbidity curtains installed upstream and downstream to limit sediment dispersion. These structures are classified as “Extreme” according to the Canadian Dam Association (CDA) consequence classification system and “Class C” under the *Dam Safety Act*, which imposes stringent design criteria, including resistance to an earthquake with a 10,000-year return period.

Layout drawings and typical cross-sections of the dikes are provided in Appendix B5.

3.2.2 UNDERGROUND MINE

Initial development and construction of the underground mine will begin in 2032 and continue for three (3) years, until full production is reached at the end of the third year. The underground mine operating life is estimated at 19 years. Mining will be conducted via a portal and an access ramp to the deposit. The portal's location is shown on the map in Appendix B2. The maximum depth of the underground mine is estimated at 650 m, distributed across 12 mining levels. The proposed underground mine will use three (3) long-hole mining methods: a transverse method for the widest portions of the mineralized body, a longitudinal method for narrower zones, and the up-hole method (drilling upward from a lower drift) on a marginal basis.

The underground workings will be backfilled with cemented tailings, uncemented tailings, or a combination of both. As mentioned in Section 3.1, approximately 17.1 Mt of mine tailings are expected to be transported underground for use as backfill.

Surface support pillars for the Shaakichiuwaanaan project include overburden pillars 8 to 12 m thick, which are sufficient to support areas where underground excavations approach the surface. The crown pillar beneath Lake 01 is 85 m thick, which meets the intent of D019 stability considerations, although it is below the 100 m thickness typically required beneath a water body (Alius, 2026). Further information on long-term stability of surface pillars is presented in Section 4.1.2 .

The layout plan and cross-sections of the underground workings are shown in Figure 3-1 and in Figure 3-2 below.

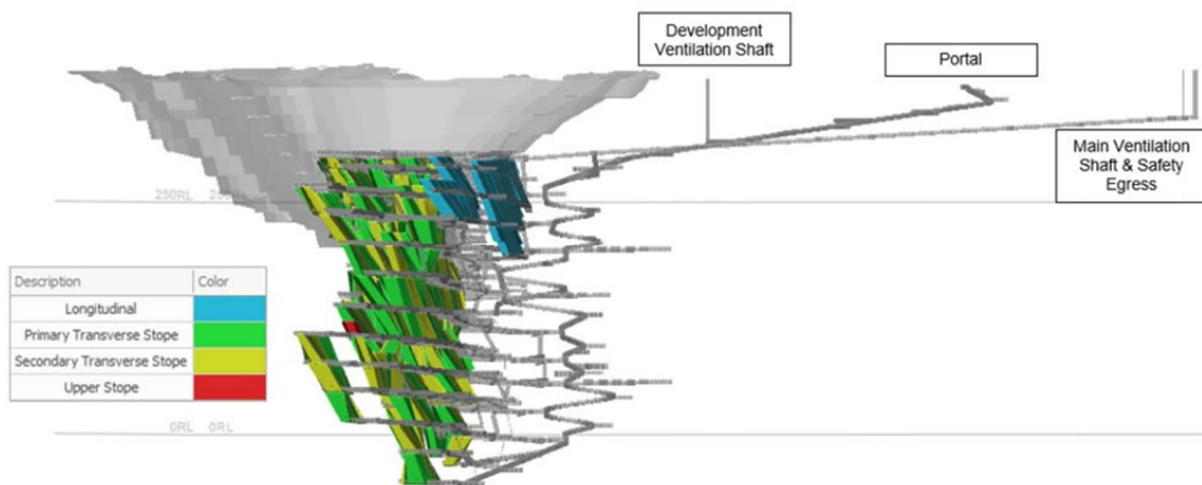


Figure 3-1 . Cross-sections of underground workings – view oriented 289°W (GMS, 2025)

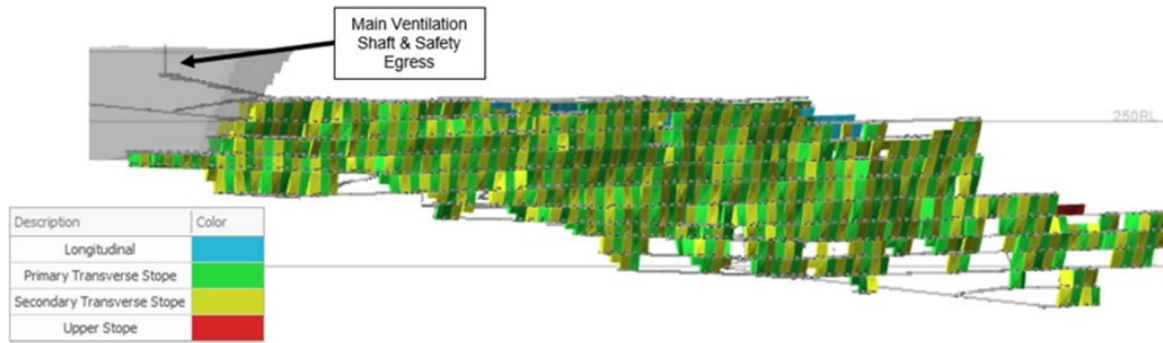


Figure 3-2 . Cross-sections of underground workings – north-facing view (GMS, 2025)

3.2.2.1 OPENINGS TO THE SURFACE

In addition to the open-pit, four (4) surface access points are planned at the Shaakichiuwaanaan mine site.

An portal providing access to the underground ramp will allow for ore haulage by truck. This portal is identified on the map in Appendix B2.

Three (3) ventilation raises/shafts are planned as part of the underground operations. Their locations are shown on the general layout plan in Appendix B2. The ventilation system will operate under a forced-draft configuration, with heated fresh air supplied to the mine using fans installed on the surface. The system will be designed to allow fan relocation/reuse as mining advances and the active workings move farther from the portal.

Table 3-3 presents a summary of the planned surface openings and their estimated dimensions.

Table 3-3 . List of planned surface openings (PMET Lithium, 2025)

Planned openings	Area (m ²)
Access portal – Underground ramp (6.5 x 5.5 m)	36
Ventilation shafts (3) (assuming a radius of 3 m)	235

3.3 EQUIPMENT AND HEAVY MACHINERY

Table 3-4 presents the list of the equipment and heavy machinery that will be used for operations at the Shaakichiuwaanaan mine site.

Table 3-4 . List of equipment and heavy machinery present at the Shaakichiuwaanaan mine site (GMS, 2025)

Equipment or heavy machinery	Number of units
140-ton mining trucks	13
Hydraulic excavators 15 m ³	2
Wheel loaders 23 m ³	2
Production drills	3
Auxiliary drill	1
600 HP crawler dozers	3

Equipment or heavy machinery	Number of units
18-foot graders	2
530 HP wheel dozer	1
Water truck	1
Service trucks	2
Mechanical trucks	2
50-ton underground mining trucks	9
18 -t load-haul-dump units (LHD)	5
10 -t load-haul-dump units (LHD)	2
Jumbo drill rigs	2
Rock bolters	6
Cable bolters	1
Production drills rigs (underground)	4
Raise Bore Drill	1
Explosives trucks	3
Motor grader	1
Aerial work platforms	5
Tractors	2
Telehandlers	2
Backhoe loaders	2
Air compressor	1
Mobile crusher	1
Light vehicles	23

3.4 BUILDINGS, FACILITIES, AND INFRASTRUCTURE

Table 3-5 lists the main infrastructure that will be located at the Shaakichiuwaanaan mining site. All infrastructure is shown on the general layout drawings in Appendix B2. Detailed drawings for specific infrastructure components are also presented in Appendix B6.

Table 3-5 . List of main infrastructure on the Shaakichiuwaanaan property

Infrastructure	
Core logging facility	Garage
Warehouses (2)	Wastewater treatment plant
Control room – underground mine	Fire station and emergency hall
Administrative Offices and Reception	Explosives magazine
69 kV electrical substation	Ore processing plant
Fuelling stations (2)	Water treatment plant
PAste backfill plant	Emulsion storage facility and explosives depot

Source: PMET, 2025.

3.4.1 EXTRACTION BUILDINGS AND INFRASTRUCTURE

The various excavation phases of the open pit and the location of the underground ramp are shown on the general layout drawing in Appendix B2. These constitute the only extraction-related infrastructure planned for the project.

3.4.2 ORE PROCESSING PLANT AND RELATED BUILDINGS

Ore processing will be carried out on-site using an ore processing plant that employs a dense media separation (DMS) process. The plant will be constructed during the first phase of operations. During the second phase, the underground mine will begin operations, resulting in an increase in ore production. This increase will require expansion of the processing plant to double spodumene concentrate production capacity.

The Shaakichuwaanaan ore processing plant is designed to produce spodumene concentrate from mined ore. The facility will include ore storage, comminution, beneficiation, dewatering, and loading. The processing method uses a gravity-based beneficiation circuit comprising two-stage dense media separation (DMS) process for coarse and fine particle size fractions. The process design will utilize two identical parallel processing lines that can operate independently of one another. Each processing line will account for 50% of the crushing, beneficiation, and dewatering capacity (GMS, 2025).

The ore processing plant is expected to achieve an overall availability and utilization rate of 81% with the remaining 19% allocated to plant maintenance (GMS, 2025). The plant is designed to process a nominal 5,000,000 dry tonnes per year (tpa) of ore. When processing raw materials with a Li_2O content of 1.31% by weight, the concentrator will be able to produce up to 827,530 tpa of spodumene concentrate with a Li_2O content of 5.50%, achieving a Li_2O recovery rate of 69.5% (GMS, 2025). Run-of-mine (ROM) ore will be stored on a concrete *ROM Pad* before being transported to the ore processing plant. The finely crushed ore will be stored on a concrete pad covered by a dome.

The main process areas within the ore processing plant are:

- Primary, secondary and tertiary crushing circuits;
- Coarse ore DMS circuit;
- Fine ore DMS circuit;
- Re-crushing DMS circuit;
- Magnetic separation and final product handling;
- Fine material diversion, dewatering and intermediate product handling;
- Final tailings management..

A simplified process flow sheet of the ore processing plant is shown in Figure 3-3 below.

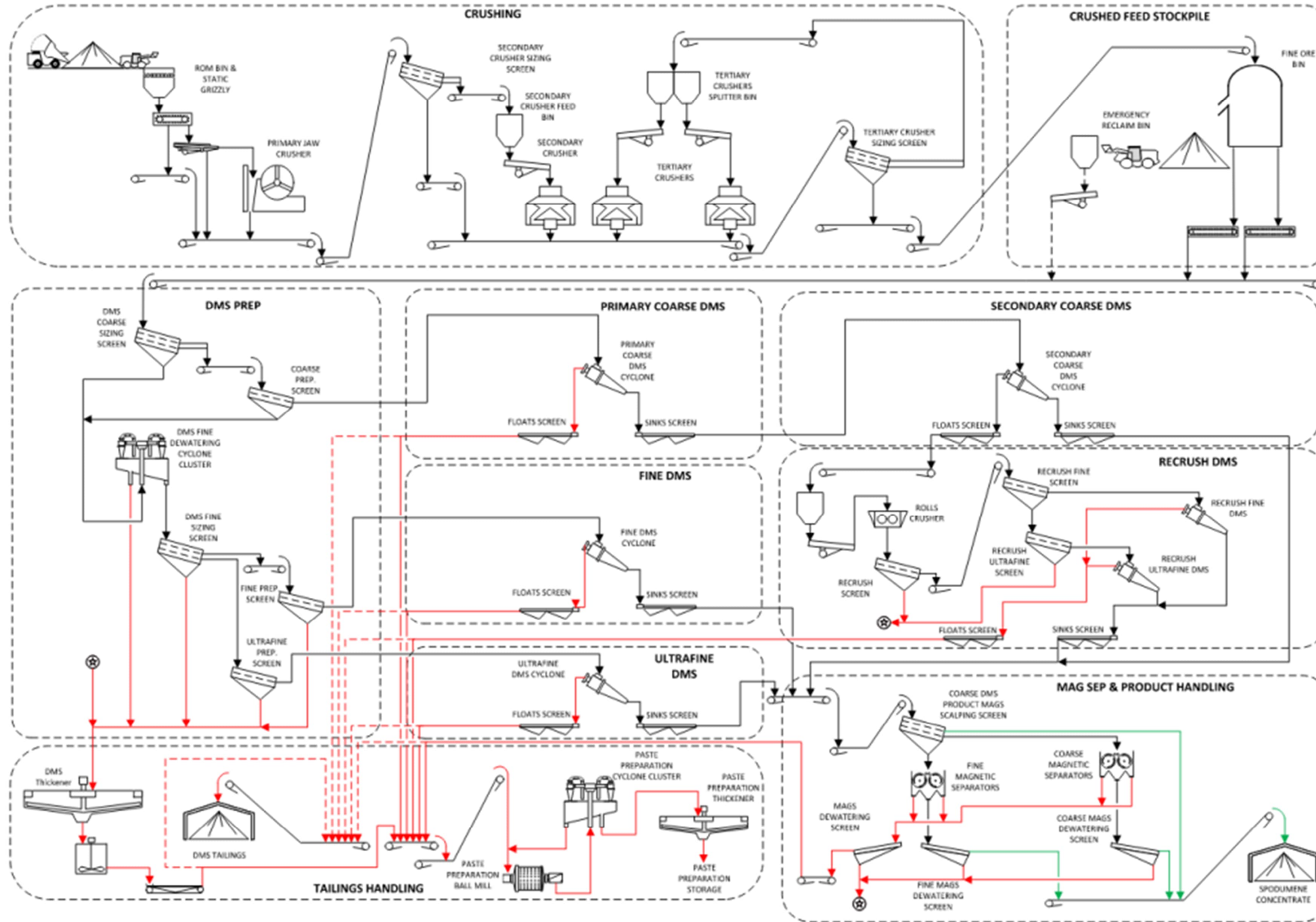


Figure 3-3 . Simplified process flowsheet of the ore processing plant (GMS, 2025)

Detailed engineering drawings of the processing plant are not available at this stage of the project. Available information on plant buildings and areas is summarized in Table 3-6 below.

Table 3-6 . Available information on ore processing plant buildings and components

Building / Area	Dimensions (W x L x H, in m)	Assumptions regarding foundations, structures, and cladding
Ore processing plant (Primary crushing)	10 x 34 x 20	Concrete foundation Steel structure Metal exterior cladding
Secondary and tertiary crushing	15 x 24 x 25	Concrete foundation Steel structure Metal exterior cladding
Screening building	17 x 36 x 21	Concrete foundation Steel structure Metal exterior cladding
Crushing electrical room	9.75 x 15.5 x 7	Concrete foundation Steel structure Metal exterior cladding
DMS Sorting	19 x 61 x 22	Concrete foundation Steel structure Metal exterior cladding
DMS plant	33 x 79 x 21	Concrete foundation Steel structure Metal exterior cladding
Paste backfill plant	19 x 31 x 20	Concrete foundation Steel structure Metal exterior cladding
Tailings management building	5.5 x 9.5 x 23.5	Concrete foundation Steel structure Metal exterior cladding
Plant MV electrical room	4.75 x 15.25 x 5.85	Concrete foundation Steel structure Metal exterior cladding
Magnetic separation	8.5 x 12 x 14.5	Concrete foundation Steel structure Metal exterior cladding
Concentrate handling	43 x 90.7 x 15.44	Concrete foundation Steel structure Metal exterior cladding

Source: GMS, 2025

3.4.3 ELECTRICAL, TRANSPORTATION, AND SUPPORT INFRASTRUCTURE

Electrical, transport, and support infrastructure are shown on the general layout drawing in Appendix B2. The level of detail presented in this plan is the most accurate currently available for the infrastructure covered in this section.

The site will not be connected to a municipal water or sewer system. A power line is planned to connect the mining site to the nearest Hydro-Québec substation, La Grande-Quatre substation, over an estimated distance of 53 km. Overhead power lines and poles will be installed on the site to distribute electricity from the main transformer to the various buildings.

As mentioned in Section 2.3, the mine site is currently accessible via an all-season road connecting the mining site to the Trans-Taiga Highway at kilometer 270. This road will also be used during the mine operation.

On-site access roads will have a maximum width of 10 m and a total length of 5,583 m. Haul roads will have a maximum width of 30 m and a total length of 13,300 m.

Table 3-7 below provides a summary of the electrical, transportation, and support infrastructure described in the preceding paragraphs.

Table 3-7 . Available information on electrical, transport and support infrastructure

Infrastructure	Units	Dimensions (W x L x H, in m), where applicable
Diesel tanks	4	1 x 20,000 L, 6 x 50,000 L
Used oil tanks	1	N/A
Compressed natural gas (CNG) tanks (trailers)	6	11,700 m ³ total
Truck scale	1	N/A
69 kV electrical transformers	2	N/A
Electric poles	270	N/A
Overhead power lines	N/A	54,000
Effluent pipelines	N/A	21,875 (see section 3.6.4)
Roads (haul and access)	N/A	11,885

The various reservoirs on the mining site are described in greater detail in Section 3.7.

3.4.4 OTHER BUILDINGS

The other buildings are also shown on the general layout drawing in Appendix B2. The level of detail provided in this plan is the most accurate currently available for the infrastructure covered in this section.

Table 3-8 . Available information on other buildings

Facility	Dimensions (W x L x H, in m)	Assumptions regarding foundations, structures, and cladding
Dormitories (2 Type A and 3 Type B)	20 x 165.2 x 6	Concrete block foundation Prefabricated wooden building Siding to be confirmed
Kitchen	18.24 x 61.35 x 5	Concrete block foundation Prefabricated wooden building Siding to be confirmed
Reception Center / Guard Post	17.8 x 36.05 x 3	Concrete block foundation Prefabricated wooden building Siding to be confirmed
Drying room	N/A	Concrete block foundation Prefabricated wooden building Siding to be confirmed
Recreation room	N/A	Concrete block foundation Prefabricated wooden building Siding to be confirmed
Recycling management center	N/A	Double-walled, leak-proof containers
Domestic waste management center	N/A	Double-walled, leak-proof containers
Corridor between camp buildings (dormitories, kitchen, and recreation room)	5 x 92	Concrete block foundation Prefabricated wooden building Siding to be confirmed
First Nations Cultural Centre	60.9 x 19.33 x 3	Concrete block foundation Prefabricated wood building Siding to be confirmed

3.5 STORAGE AREAS

The various storage areas were the subject of design studies conducted by AtkinsRéalis. These studies are available in Appendix H of this document.

Waste rock stockpiles 001 and 002 will be subject to continuous geotechnical monitoring using instruments such as piezometers (water levels and pore pressures), inclinometers (deep deformations), and settlement plates (compressible behaviour). These measures ensure slopes stability and compliance with design criteria.

Environmental performance will also be monitored through control of contact water collected around the stockpiles, including monitoring of flow, hydraulic characteristics, total suspended solids (TSS), and dissolved metals, particularly for Stockpile 001, which contains materials that are

potentially acid-generating or leachable. The associated ponds and ditches will also be inspected to ensure their capacity to manage anticipated hydrological events.

3.5.1 WASTE ROCK STORAGE (STOCKPILE 001)

A low-risk waste rock stockpile will be constructed at the Shaakichiuwaanaan mine site. This stockpile will be designed to store 43.5 Mt of waste rock to a height of 90 m, with an overall slope of 3.25H:1V, ensuring stability during operations (Atkins, 2026b). Runoff water will be collected by ditches and conveyed to the Stockpile 001 water management pond.

3.5.2 WASTE ROCK AND TAILINGS CO-DISPOSAL STOCKPILE (STOCKPILE 002)

The co-disposal stockpile will be the largest storage area at the Shaakichiuwaanaan mine site. It will contain waste rock that cannot be stored on the low-risk waste rock stockpile, as well as mine tailings from ore processing. This stockpile will be designed to store 81 Mt of waste rock in its eastern section and 54 Mt of mine tailings in its western section (Atkins, 2026b). The base of the stockpile will be lined with a 1.5-mm-thick HDPE geomembrane, protected by a 1-m-thick cushion layer (Atkins, 2026b). The stockpile will have an overall slope of 3.25H:1V and a maximum height of 120 m (Atkins, 2026b). Runoff water will be collected by lined ditches and conveyed to the Stockpile 002 water management ponds before being directed to the water treatment plant.

3.5.2.1 MODELING DEMONSTRATING THE EFFECTIVENESS OF THE LINING MEASURES

The hydrogeological study conducted by Atkins, available in Appendix I, includes a model assessing the effectiveness of the lining measures planned for Stockpile 002 (Atkins, 2026b). This modelling was conducted in accordance with the requirements of D019 and demonstrates that the lining measures installed beneath and within Stockpile 002 will prevent any significant degradation of groundwater quality during the operational, rehabilitation, and post-rehabilitation phases (Atkins, 2026b).

3.5.3 ORE STORAGE

Two (2) ore stockpiles will be established at the mine site: one for low-grade ore and one for high-grade ore. Each stockpile will cover approximately 17 000 m². Runoff water from the ore stockpiles will be collected by ditches and pumped to the site water treatment plant. These stockpiles will be located immediately southwest of the run-of-mine (*ROM*) pad, which has an area of approximately 65 000 m² and will temporarily hold the spodumene pegmatite prior to feeding the ore processing plant. These facilities are shown on the general layout drawing in Appendix B2.

3.5.4 OVERBURDEN AND ORGANIC MATERIAL STORAGE

Two (2) overburden stockpiles (Stockpiles 004 and 005) will be developed south of the open pit. The overburden will be stored during operations and used for the rehabilitation of the site at the end of operations. Stockpile 004 will store approximately 8.1 Mt of overburden, while Stockpile 005 will store

approximately 8.8 Mt (Atkins, 2026b). Additionally, two (2) organic material stockpiles will be present at the site and will store 3.2 Mt of organic material for use in site rehabilitation. These stockpiles are shown on the general layout plan in Appendix B2.

3.6 MINE WATER MANAGEMENT

The following sections describe the main activities and infrastructure related to the management of contact water (i.e., potentially contaminated water). Plans outlining the Shaakichiuwaanaan site water management system are presented in Appendix B5. The mine site water management system design study conducted by AtkinsRéalis is presented in Appendix H. A baseline hydrological study including hydrogeological modelling, also conducted by AtkinsRéalis, is provided in Appendix I1, and a hydrogeological study conducted by Mailloux Hydrogéologie is provided in Appendix I2.

3.6.1 SURFACE WATER MANAGEMENT

Runoff from Stockpile 001, primarily containing total suspended solids (TSS), will be collected by a ditch encircling the pile and then directed either to Collection Pond 01 or Collection Pond 01A, located respectively north and south of stockpile 01. A pump station installed at each of Ponds 01 and 01A will convey the water via pipelines to the mine water treatment plant located southwest of the industrial area.

Runoff from Stockpile 002, which contains potentially leachable materials (notably arsenic), will be collected by lined perimeter ditches and directed to two lined ponds (Collection Pond 2 and Collection Pond 3), located respectively north and south of Stockpile 002. A pump station installed at each of Ponds 2 and 3 will convey the water via pipelines to the mine water treatment plant.

Runoff from the industrial zone, which mainly contains TSS, will drain by gravity either to Collection Pond 1 or to Collection Pond 2, located south of the industrial zone and north of the pit. A pumping station installed at each of Pond 01 and 01A will pump the water through pipelines to the mine water treatment plant.

Runoff from the industrial area and ore stockpiles will also be collected in a pond and then pumped to the mine water treatment plant. Runoff from the overburden stockpile will flow toward the open pit and will subsequently be handled by the pit dewatering system.

3.6.2 MINE DEWATERING WATER MANAGEMENT

Dewatering water originates from the open pit and the underground mine dewatering systems, including groundwater inflows, runoff, and service water. Maximum infiltration rates are estimated at 4,900 m³/day for the underground mine and 8,100 m³/day for the open pit (GMS, 2025). For the open pit, accumulated water is pumped via a system capable of handling up to 2.7 Mm³ per year and is transferred to the industrial area sedimentation ponds. For the underground mine, water will drain by gravity to sump at the lower levels and then be pumped to a mid-level settling bay before being conveyed to the surface. These dewatering waters are

considered contact water and will be treated primarily for TSS and hydrocarbons prior to final discharge and/or reuse in the process.

3.6.3 WATER TREATMENT

Non-potentially contaminated contact water, such as runoff from Stockpile 01 and dewatering water, will be directed to passive treatment via two sedimentation ponds. Subsequently, this water will be directed to the polishing pond, then to the final effluent if it meets the requirements of D019 and the Metal and Diamond Mining Effluent Regulations (MDMER or REMMMD in french).

Mine wastewater will be conveyed to the water treatment plant (WTP). This plant is designed to scale with the mine needs, offering a design capacity of 2,000 m³/h (normal flow rate of 800 m³/h) during Phase A (2028–2030) and increasing to 2,800 m³/h (normal flow rate of 1,120 m³/h) for Phase B (2030–2049), with up to three treatment lines operating simultaneously during spring freshet conditions. This plant uses active physicochemical treatment process: acidity is neutralized and metals (particularly arsenic) are precipitated by adjusting the pH and chemicals dosing, producing sludge that will be dewatered via geotubes and returned to Stockpile 002 for disposal (GMS, 2025). The treated water will then be conveyed to the polishing pond and subsequently to the final effluent if compliant with D019 and the MDMER.

3.6.4 FINAL EFFLUENT

The outlet of the polishing pond constitutes the only final effluent from the site. The discharge will be released into Creek CE11, approximately 2.5 km downstream from the outlet of Lake 01 at the diversion channel (Atkins, 2026b). From the discharge point, polishing pond effluent will travel approximately 1.5 km before entering Lake 27 (Atkins, 2026b). Atkins conducted a study of flooding, erosion, and dispersion associate with the diversion channel in River C-15 following the construction of the mine facilities to determine the distance required for effective mixing of the effluent with the natural river flow. The study (Atkins, 2026b), attached as Appendix H, also assesses the potential impact of effluent contaminant concentrations in on the receiving watercourse.

Effluent quality will be monitored through regular sampling to confirm compliance with *Directive 019 on the Mining Industry* (D019) and the *MDMER*. The effluent sampling point and associated flow-measurement device are identified on the drawings in Appendix B5. According to the water management drawings provided by Atkins and available in Appendix B5, it is estimated that approximately 21,875 m of HDPE pipelines will be required to transport water across the mine site.

3.7 WATER MANAGEMENT

3.7.1 DRINKING WATER AND SANITARY WASTEWATER

Given the remote location, the site will have its own potable water production and distribution system as well as domestic wastewater collection and treatment system. The buildings that will be supplied with potable water include the camp (dormitories, kitchen, offices, etc.), the administrative offices of the ore processing plant, the drying plant, the garage, and the emergency hall. The camp is designed to accommodate up to 672 workers at maximum capacity; water requirements are therefore estimated at a maximum of 161 m³/day (GMS, 2025). Potable water production and domestic wastewater management systems were sized based on this demand. During operations, potable water will be drawn from Lake 308 via submersible pumps and conveyed through an insulated pipeline to a centralized treatment plant using ultrafiltration, nanofiltration, and disinfection (UV and chlorination) to remove contaminants and ensure compliance with drinking water quality standards.

Domestic wastewater from the buildings will flow through an equalization tank and then undergo biological treatment using a moving bed bioreactor (MBBR), followed by chemical coagulation for phosphorus removal and UV disinfection. Residual sludge from the treatment process will be transported off-site to an authorized facility, while the treated effluent will be directed to the polishing pond to support a centralized final discharge for all site water.

3.7.2 CLEAN SURFACE WATER MANAGEMENT

The key component of the clean surface water management system is the construction of a diversion channel for Lake 01. This channel is designed to redirect water from Lake 01—which is currently blocked by the retaining dikes—to Lake 05, thereby bypassing the open-pit footprint and replacing the lake’s natural outlet toward River CE-15 and ultimately Lake 27 downstream.

The diversion channel and retention dikes will be designed to safely convey normal and flood flows up to the Maximum Probable Flood (MPF), in accordance with D019. They will also incorporate features that support aquatic habitat and maintain hydraulic conditions conducive to fish migration (Atkins, 2026b). The natural outlet of Lake 01 (CE01) will be relocated to the entrance of the diversion channel. This change shifts the outlet approximately 2 km upstream from its original location. The study (Atkins, 2026b), attached in Appendix I, also evaluates the potential impact of this modification on waterbody morphology.

3.8 STORAGE AND DISPOSAL SITES

3.8.1 CHEMICALS

Table 3-9 lists the chemical products that will be present on the Shaakichiuwaanaan property. These products will be used for ore processing, specifically for the dense media separation (DMS) process.

Table 3-9 . List of planned chemical products on the mining property

Product	Use	Storage method	Annual quantity used (t)	Max. quantity stored (t)
Ferrosilicon (FeSi)	Densifying agent	1-ton flexible bags stored on pallets in a dry, well-ventilated warehouse	1,000	50
Magnofloc 10	Anionic flocculant	25-kg bags on pallets, stored in a dry, well-ventilated area	10	2

3.8.2 PETROLEUM PRODUCTS AND EXPLOSIVES

Table 3-10 outlines the storage locations for the various petroleum products that will be present on the Shaakichiuwaanaan property. Explosives will be stored in the explosives magazine located near the emulsion storage facility. Magazine capacity will allow for 5.5 days of self-sufficiency without delivery. The emulsion will be delivered in 1,500-kg totes. The infrastructure is shown on the general layout drawing in Appendix B2.

Table 3-10 . Petroleum product tanks planned on the mining property

Tank	Quantity	Unit capacity (L or m ³)
Gasoline tank	1	20,000 L
Natural gas tanks (trailers)	6	11,700 m ³
Diesel tank	6	1 x 20,000 L, 6 x 50,000 L
Used oil tank	1	3,000 L

Source: PMET, 2026 (via email)

3.8.3 NON-HAZARDOUS WASTE

At this time, it is anticipated that the Radisson engineered landfill site (LET) will be used for the disposal of non-hazardous residual materials generated at the mining site. PMET is in communication with the Municipality, which has confirmed that sufficient capacity is available to accommodate the residual materials generated by the project. PMET is considering composting as part of site operations, however, this option has not been analyzed as part of the Rehabilitation Plan or the impact assessment.

3.8.4 HAZARDOUS RESIDUAL MATERIALS

Hazardous residual materials (HRM) will be stored in the warehouse shown on the general layout plan in Appendix B2. A used oil tank will also be located near the garage.

3.8.5 CONTAMINATED SOIL

If soil becomes contaminated with petroleum hydrocarbons in the future, those soils along with contaminated response materials, will be stored in separate, sealed and clearly labelled containers and shipped to an authorized facility for management/disposal.

3.9 PUBLIC INFORMATION AND CONSULTATION PROCESSES

In accordance with regulatory requirements and to promote the project's social acceptability, PMET has integrated social and economic considerations into the planning of the mine rehabilitation work. Although few meetings have been dedicated exclusively to rehabilitation to date, this topic has been addressed repeatedly in discussions with stakeholders, as post-mining issues are a concern expressed by them. Meetings focusing specifically on site rehabilitation were held with representatives from the relevant government departments. A public event provided an opportunity to discuss with members of the Chisasibi First Nation, among other topics, issues related to the future use of the site and expectations regarding rehabilitation.

These consultation efforts, initiated at the start of the project, will continue throughout operation and during revisions of the Rehabilitation Plan, using an inclusive and adaptive approach that takes into account the concerns of the relevant stakeholders.

To this end, PMET maintains a meeting log documenting all discussions held since January 2022, which currently contains over 400 entries and ensures the traceability of concerns raised. A summary of the results of consultations relevant to mine rehabilitation is presented in Appendix Q.

4 SITE REHABILITATION AND REMEDIATION MEASURES

Rehabilitation work will be carried out in accordance with the applicable rules of *the Guide de préparation du plan de réaménagement et de restauration des sites miniers au Québec* (MRNF, 2024), Directive 019, and any other applicable provisions, such as the *Intervention Guide – Soil Protection and Contaminated Sites Remediation* and the *Regulation respecting the Protection and Rehabilitation of land* (c. Q-2, r. 37).

The rehabilitation and reclamation measures presented below intended to return the mine site to a satisfactory condition, namely to:

- Eliminate unacceptable health risks and ensure public safety;
- Limit the production and spread of substances that could harm the receiving environment and, in the long term, aiming to eliminate all forms of maintenance and monitoring;
- Restore the site to a condition that approximates the original or surrounding ecosystem, including mine tailings and waste rock accumulation areas where possible;
- Restore infrastructure areas to a condition compatible with future land use.

4.1 WORK AREA SAFETY

4.1.1 SECURING THE OPENINGS TO THE UNDERGROUND MINE

The mine openings will be sealed during site rehabilitation in accordance with the requirements of section 99 of *the Mining Regulations (Règlement sur les mines)*. The ramp portal will be backfilled with low-risk mine waste rock to fully block access. The other openings, namely the ventilation shafts, will be secured with concrete slabs. The list of surface openings on the Shaakichiuwaanaan property to be secured is presented at Table 3-3 .

4.1.2 STABILITY OF SURFACE PILLARS

A surface pillar stability study is presented in Appendix J. As part of the long-term stability analysis, the surface pillars were evaluated using a geotechnical model incorporating the geological, structural, geomechanical, and hydrogeological characteristics of the site, in accordance with the general principles presented in Appendix 8 of the Guide. Results show that the surface pillars, with typical thickness ranging from 8 to 12 m, have a low probability of failure ($\approx 1.2\%$ to 6.6%), which is considered acceptable for long-term structures in moderately competent lithologies such as metasediments ($Q' \approx 5-8$) (Alius, 2026). Numerical analyses, however, predict minor plastic deformation at the end of the sequence (2047–2049), without a global failure mechanism, provided that the cemented backfill requirements (210–540 kPa, up to 2.0 MPa, when required) are met, which PMET commits to implement.

4.1.3 STABILITY OF THE FINAL PIT WALLS

A final pit walls stability study (Alius, 2026) is presented in Appendix J. Final pit wall stability was analyzed in accordance with the approach recommended in Appendix 8 of the Guide, which requires a multiscale assessment (bench, inter-bench, overall slope) that takes into account minor structures, major structural discontinuities, and the overall rock mass behaviour, as well as the potentially significant influence of pore pressure. The optimal geometric parameters determined in the study include face angles ranging from 40° to 75°, inter-bench angles from 32° to 55°, step heights of 8.5 to 12 m, and geotechnical berms of 16 m for walls exceeding 160 m in height, enabling a safety factor greater than 1.5 under fresh rock conditions and retention of more than 70% of potential debris. The main failure modes include planar sliding controlled by major structural units, localized wedge failures, and deformations within the ultramafic unit (UMU). No global failure was identified in the post-mining 3D modelling (Alius, 2026).

4.1.4 IMPACT ANALYSIS IN THE EVENT OF A BREACH OF THE LAKE 01 DAM

The potential failure of the Lake 01 dikes, which will be constructed for Phase 1 (West Pit) and Phase 2 (East Pit) of the open-pit operations at the Shaakichiuwaanaan site, was assessed to evaluate consequences in accordance with the Canadian Dam Association (CDA) consequence classification criteria. This analysis (Atkins, 2026d) is presented in Appendix K.

The study shows that only a breach of the West Pit dike could result in downstream impacts, as the lake volumes would then flow into the Lake 27 watershed, whereas failure of the East Pit dikes would only result in drainage of the lake into the open pit (Atkins, 2026d). The hydrodynamic analysis conducted for scenarios under fair-weather and maximum flood scenarios reveals that no permanent residents would be exposed, as the only downstream dwelling is located at an elevation above projected water levels. However, at least one temporary worker could be at risk in the event of a breach under clear-weather conditions, leading to a “high” potential loss of life classification. Anticipated environmental damage remains limited to temporary effects on water levels, erosion, and sedimentation, without significant habitat loss, while damage to infrastructure and the economy is assessed as low, given the site isolation. Considering these factors, the recommended final consequence classification for the Lake 01 dikes is “High” (high consequences) (Atkins, 2026d).

The West Pit dike will be dismantled during the operating period to allow continued pit mining. At closure, a breach will be created in a section of the West Pit dike to allow flooding if the mine and restoration of natural drainage. As a result, no water retention structures will remain during the post-rehabilitation period at the Shaakichiuwaanaan mine site.

4.2 DISMANTLING OF BUILDINGS AND INFRASTRUCTURE

It is planned that all surface buildings and infrastructure will be removed from the site or demolished by a certified contractor. Scrap metal will be sold or recycled, while residual materials from the dismantling will be disposed of in an authorized engineered landfill site.

Rehabilitation work will initially include the following activities:

- Temporary structures, including containers, storage shelters, and all other demobilizable installations, will be recovered by PMET or sold on the used equipment and salvage markets.
- Permanent building (ore processing plant, paste backfill plant, etc.) will be demolished by a certified contractor, and demolition materials will be properly managed according to their nature. Only the cultural center will be left in place, as local communities expressed an interest in retaining this building during the consultations documented in Appendix Q.
- Electrical equipment and infrastructure owned by PMET (poles, power lines, transformers, etc.) as well as electrical substations and telecommunications installations, will be dismantled by a specialized contractor. The power line connecting the mine site to Hydro-Québec will remain in place, as local communities expressed an interest in retaining this infrastructure during the consultations reported in Appendix Q.
- Non-reusable materials and equipment will be stored at an authorized site, donated, or sold on the markets for the recovery and sale of used equipment.
- All service equipment (e.g. tanks, pipes, pumps, heating units, ventilation systems) will be drained and cleaned. Water used for cleaning will be collected and then treated (if necessary) before being discharged into the environment.
- All equipment containing oils or other liquids that pose a risk of environmental contamination, such as electrical equipment, vehicles, and fuel tanks, will be drained of their contents before being removed from the operations site.
- Above-ground water pipelines, pumps, power lines, and telephone lines will be removed. Pipelines in good condition will be sold or retained for future reuse. Obsolete pipelines will be disposed of in accordance with the provisions of the *Regulation respecting the Landfilling and Incineration of Waste* (REIMR).
- Buried cables will be disconnected from their power source and left in place if they do not pose a potential source of contamination; similarly, buried pipelines will be sealed and left in place.
- Any underground infrastructure that poses a contamination risk (tanks, containers, etc.) will be decontaminated and removed from the underground mine prior to its flooding and sealing. Infrastructure that does not pose environmental concerns will be left in place.

- All chemicals, residual materials, and hazardous residual materials (HRM) will be managed safely in compliance with applicable standards and regulations. Solid, liquid, slurry and sludge materials will be characterized where necessary, and their destination will be approved by the site environmental management representative.

Although several of the above measures refer to the sale of equipment and/or materials, rehabilitation costs were estimated based on a worst-case scenario, assuming that no sale or reuse is possible.

4.2.1 REHABILITATION OF DISTURBED AREAS

Following the dismantling work, the property will be reworked to achieve rehabilitation objectives in accordance with established standards:

- In general, areas disturbed by mining activities, including site roads, will be scarified, regraded, and revegetated to prevent erosion and ponding.
- The access roads required for monitoring and maintenance activities will be maintained.
- The concrete slabs and foundations of the various buildings will be broken up or cracked to promote drainage, then covered with 15 cm of overburden before being revegetated. A list of buildings on concrete slabs is presented in Table 2 of Appendix O.

Table 4-1 summarizes the areas considered for scarification and revegetation of the disturbed footprints, as well as the total concrete slab area to be covered with loose deposits prior to revegetation. These areas exclude structures subject to specific measures (stockpiles, pond, etc.).

Table 4-1 . Footprint considered for revegetation

Area to be scarified (m ²) (excluding all stockpiles and all ponds)	Concrete slab footprint (m ²)
842,078	14,297

4.3 LAYOUT OF EXTRACTION EQUIPMENT AND HEAVY MACHINERY

Mining equipment and heavy machinery will be sold by PMET. No equipment is expected to remain on-site upon its closure. The list of equipment and heavy machinery is provided in Section 3.3 of this Rehabilitation Plan.

4.4 COMPARATIVE ANALYSIS OF REHABILITATION SCENARIOS

A comparative analysis of rehabilitation scenarios was conducted by Atkins Réalis (Atkins, 2025). This analysis identified the rehabilitation concepts to be implemented for the Shaakichiuwaanaan mine site based on four (4) main categories of criteria: community, environment, economy, and reliability. The comparative analysis is provided in Appendix L. A summary is presented below.

For Stockpile 001, the following options were considered:

1. Natural colonization by surrounding vegetation;

2. Revegetation consistent with baseline conditions;
3. Revegetation using a typical seed mix adapted to the environment;
4. Revegetation using islands of selected plant species of interest combined with a typical seed mix adapted to the environment..

The second option was chosen for Stockpile 001, namely revegetation based on the initial condition of the environment.

For Stockpile 002, the following options were considered:

1. Cover with an impermeable geomembrane;
2. Engineered cover with control;
3. Cover with low-permeability natural materials (compacted tailings or clay and silt);
4. Cover with an impermeable barrier using soils amended with bentonite;
5. Capillary barrier cover (CCBE).

The first option was chosen for Stockpile 002, namely an impermeable geomembrane cover.

For the open pit, the following options were considered:

1. Active flooding of the pit;
2. Passive flooding of the pit;
3. Transfer of potentially acid-generating mine materials with water cover;
4. Placement of low-risk waste rock in Phase 1 of the pit;
5. Complete backfilling of the pit followed by cover placement and revegetation.

The fourth option was chosen for the pit, placement of low-risk waste rock in the pit. The pit will subsequently be flooded.

4.5 REHABILITATION OF ACCUMULATION AREAS

4.5.1 STOCKPILE 001

The slopes of the stockpile will have been flattened during operations to achieve a final profile of 3H:1V, which will facilitate the application of a 200-mm overburden layer and a 300-mm organic matter layer and minimize the risk of erosion. The stockpile will then be revegetated using hydroseeding. This configuration will ensure the stability of the stockpile during the post-rehabilitation phase (Atkins, 2026b), as demonstrated in the stability study in Appendix H.

4.5.2 STOCKPILE 002

The slopes of the section containing the waste rock will have been flattened during operations to achieve a final profile of 3H:1V, in order to ensure the stability of the stockpile during the post-rehabilitation phase (Atkins, 2026b), as demonstrated in the stability study in Appendix H. The section containing the mine tailings will not require reprofiling, as its design configuration is stable

over the long term with a profile of 3.25H:1V (Atkins, 2026b). Due to the geochemical nature of the mine materials constituting Stockpile 002, an impermeable cover is required. During rehabilitation, the stockpile will be covered with a multi-layer system consisting of 150 mm of protective sand, followed by an HDPE geomembrane, a geotextile, 200 mm of protective sand, and 200 mm of organic material. The stockpile will then be revegetated using hydroseeding. The protective sand required for the multi-layer cover will be sourced from borrow areas located near the site, while the geomembrane and geotextile will be supplied by an external provider.

4.5.3 ORE STOCKPILES

No ore will remain on the stockpiles. The stockpile footprint will be characterized, scarified, and revegetated.

4.5.4 OVERBURDEN STOCKPILES (004 AND 005) AND ORGANIC MATERIAL STOCKPILES

No overburden will remain on the two overburden stockpiles or on the organic material stockpiles. These materials will be fully reused for the site rehabilitation. The stockpile footprints will be scarified and revegetated.

4.6 REHABILITATION OF WATER MANAGEMENT INFRASTRUCTURE

4.6.1 DITCHES

In general, runoff collection ditches at the mine site will be backfilled with overburden from the overburden stockpiles. As the ditches associated with Stockpile 002 are lined, the geomembrane will be removed prior to backfilling these ditches.

4.6.2 COLLECTION PONDS

Runoff collection ponds at the mine site, including those associated with the stockpiles, will be retained until the rehabilitation of these stockpiles has been completed and the water quality meets applicable regulatory requirements.

Subsequently, the sediments accumulated at the bottom of the ponds at Stockpile 001 and in the industrial area will be excavated and then disposed of in an appropriate location, namely Stockpile 002. Next, the geomembranes will be removed, and a breach will be created in the dike of each pond to ensure the free drainage of water. To ensure the long-term stability of these breaches, they will be reinforced using geotextile and riprap. Once this work has been completed, the ponds will be revegetated by hydroseeding.

The sediments from the ponds associated with Stockpile 002 and water treatment plant will need to be disposed of at an authorized off-site facility, as the cover of the co-disposal stockpile will have been completed prior to the rehabilitation of these ponds and the sediments present a potential contamination risk. The disposal location will be determined at the appropriate time.

It should be noted that, during the post-closure phase, an additional pond will need to be constructed near Stockpile 002 to manage the additional runoff resulting from the installation of the geomembrane over the entire stockpile. Once the rehabilitation work has been completed, this pond will be dismantled in the same manner as the other water management ponds at Stockpile 002.

4.6.3 MINE DRAINAGE WATER

Pumping for dewatering of the underground mine and the open-pit mine will be stopped at the end of the mine operating period. The underground mine will be gradually flooded.

4.6.4 WATER TREATMENT PLANT

The water treatment plant is expected to remain in operation until it is demonstrated that the quality of the water entering the plant no longer requires treatment prior to discharge into the environment to meet applicable regulatory standards. It is estimated that this demonstration will be achieved four (4) years after the end of operations and the start of the post-operation phase of the mining site. Following this period, the water treatment plant will be dismantled.

4.6.5 FINAL EFFLUENT

4.6.5.1 POST-OPERATION

During the post-operation period, the final mine effluent will remain in place, as the site water management system will continue to operate until rehabilitation works have been completed and water quality meets applicable regulatory requirements.

4.6.5.2 POST-REHABILITATION

During the post-rehabilitation period, once water quality has been confirmed, the dismantling of the water management system—including the creation of breaches in the dikes of the collection ponds for Stockpiles 001 and 002—and the site topography will result in four (4) final effluents to be monitored: two (2) effluents at Stockpile 001 and two (2) effluents at Stockpile 002. The final effluent at the outlet of the site water treatment system will have been dismantled.

4.6.6 DIKE

A breach will be created in one of the dikes used to dewater the open pit in order to restore the natural water flow. The pit will fill until reaching a piezometric equilibrium with the surrounding environment.

4.6.7 DIVERSION CHANNEL

The diversion channel used to redirect water that would normally flows toward Lake 01 to Lake 05 will be maintained, as it is anticipated that the channel will become fish habitat during the mine

life. As this channel does not constitute a water retention structure, its retention will not result in any safety-related, geochemical or geotechnical stability impacts on mine site infrastructure.

4.7 CHEMICALS, PETROLEUM PRODUCTS, AND WASTE MATERIALS

4.7.1 CHEMICALS

PMET will recover all remaining products and dispose of them in accordance with applicable regulations.

4.7.2 PETROLEUM PRODUCTS

Petroleum products (diesel, oils and greases, CNG) should be depleted by the end of operations. If not, they will be recovered by PMET. All tanks used on-site to store petroleum products, as well as the associated piping, will be drained, cleaned, dismantled, and disposed of in accordance with applicable regulations. The soil adjacent to the tanks and containers will be characterized, and corrective measures will be implemented in accordance with the requirements of *the Intervention Guide – Soil Protection and Contaminated Sites Rehabilitation* in the event of contamination.

4.7.3 EXPLOSIVES

Any unused explosives will be recovered by a specialized explosives.

4.7.4 NON-HAZARDOUS RESIDUAL MATERIALS

Non-hazardous residual materials generated during operations and rehabilitation will be sorted. Scrap metal and electronic waste will be sent to authorized recycling facilities. Other materials will be transported to an authorized disposal facility.

4.7.5 HAZARDOUS RESIDUAL MATERIALS

The management of hazardous residual materials is regulated, and their disposal will comply with the requirements of *the Regulation respecting hazardous materials* and the *Environment Quality Act* (EQA).

No hazardous residual materials are expected to remain on the Shaakichiuwaanaan property at the end of rehabilitation activities, as these materials will have been recovered by a specialized contractor.

4.8 CLIMATE CHANGE IMPACTS

Anticipated climate change is expected to result in significant disturbances to the hydrological regime. Infrastructure that is most vulnerable to climate change impacts is therefore largely associated with water management (Atkins, 2026b). A climate change resilience analysis was conducted by WSP as part of the environmental and social impact assessment for the Shaakichiuwaanaan mining project (WSP, 2026). This section summarizes the key conclusions of that analysis.

Relevant climate hazards for the site were identified and can be categorized as follows:

- Extreme precipitation and flooding;
- Freezing rain;
- Heat waves;
- Freeze-thaw cycles and winter thaws;
- Drought and wildfires;
- Strong winds and thunderstorms;
- Snowfall;
- Extreme cold waves;
- Lengthening of the summer season.

Climate projections were developed using the SSP5-8.5 emissions scenario over time horizons corresponding to the project life: short-term (2011–2040), medium-term (2041–2070), and long-term (2071–2100).

These projections indicate a marked increase in annual temperatures, with hotter summers and milder winters, although winter cold waves remain possible. The number of days with temperatures exceeding 28°C is expected to increase significantly. Precipitation is also projected to intensify, particularly liquid precipitation.

Extreme precipitation events, both in duration and intensity, are expected to, potentially resulting in greater flood and erosion risks. Snow may be affected by an increased frequency of rain-on-snow and freeze-thaw cycles, influencing the infrastructure stability. Freezing rain is expected to remain relatively stable overall, but may become slightly more frequent in the medium term under a moderate scenario and in the long term under a high-emissions scenario. Finally, wind projections are subject to considerable uncertainty, however, trends indicate an increase in the number of dusty days. Furthermore, forest-fire-related indicators show an upward trend, particularly the duration of the fire season and the Forest-Weather Index (FWI).

Table 4-2 presents the risk profile between climate hazards and components during the rehabilitation and post-rehabilitation phases, which were assessed for the time horizons relevant to this phase (medium-term : 2041–2070 ; long-term : 2071–2100).

Table 4-2 . Risk profile for future time horizons (SSP5-8.5)

Risk level	Number of interactions	
	2041–2070	2071–2100
Very low	0	0
Low	2	1
Moderate	2	3
High	1	0
Very high	1	2

It is expected that very low and low-level risks can be managed largely through existing design standards and operational and maintenance practices. Consequently, the remainder of the assessment and the recommendations focus on moderate to very high-level risks.

Table 4-3 details the proposed adaptation measures based on their identified impacts and risks, as well as an estimate of the residual risk level if the measures are implemented.

The anticipated residual risk represents a subjective estimate of the level of risk that may remain following implementation of the proposed resilience measures. While the proposed adaptation measures aim to reduce the initial risk level, residual risk can only be confirmed once the measures are implemented, and their effectiveness may vary depending on the extent of implementation.

Table 4-3 . Results of the climate change adaptation assessment for the rehabilitation of the Shaakichiuwaanaan mine site

Systems/components	Potential impacts	SSP5-8.5 Preliminary risk score 2050	SSP5-8.5 Preliminary risk score 2080	Proposed adaptation measures	Final risk scale (residual risk)
Covering of storage areas (Stockpile 001 and 002)	Erosion of stockpiles. Increased dust.	Moderate	Moderate	Implement temporary erosion control measures and best management practices to reduce the risk of erosion during the first few years (until vegetation is well established). Monitor vegetation cover to identify bare or vulnerable areas.	Moderate
Diversion/drainage structures	Surface erosion of spillways due to runoff. Backward (internal) erosion that could lead to a levee breach. Water infiltration raising the groundwater level and potentially affecting slope stability. Exceeding the capacity of the structures.	Very high	Very high	Take site-specific climate change projections into account when designing diversion and drainage structures. Provide for excess water diversion channels, secondary diversion channels, or emergency spillways to prevent overflows. Stabilize banks to limit erosion.	Moderate
Roads, ditches, bridges, and culverts	Damage to roads resulting in loss of access to restored sites for monitoring purposes. Icing of culverts and reduced drainage capacity. Increased need for de-icing and snow removal. Increased dust concentration.	Moderate	Moderate	Take site-specific climate change projections into account when designing culverts and ditches. Plan for increased road monitoring and maintenance activities due to climate change to maintain access for monitoring activities. Plan for potential delays in monitoring activities due to extreme events that pose a danger to workers. Educate workers on the dangers and precautions to take.	Low
Vegetation	Difficulties in establishing vegetation due to extreme heat, strong winds, and drought. Forest fires could destroy vegetation on the site, leading to increased runoff and erosion.	High	Very high	Implement soil stabilization measures, such as vegetation cover resistant to drought and extreme temperatures. Develop a post-event revegetation plan using species adapted to extreme climatic conditions.	Moderate
Monitoring activities	Loss of access to restored sites for monitoring purposes (damage to access roads).	Low	Moderate	Plan for increased road monitoring and maintenance activities in response to climate change to ensure continued access for monitoring activities. Allow for potential delays in monitoring activities due to extreme weather events that pose a danger to workers. Educate workers about the hazards and the precautions they should take.	Low

4.9 LAND REHABILITATION

At mine closure, a site characterization study will be conducted for the Shaakichuwaanaan property, as required under section 31.51 of the EQA. Should this characterization identify contaminants exceeding regulatory criteria, PMET will implement the necessary measures in accordance with the EQA and the *Regulation respecting the protection and remediation of land* (c. Q-2, r. 18.1.01).

4.10 REVEGETATION PLAN

PMET plans to revegetate the property by optimizing the use of native species in certain selected areas and using hydroseeding for the remainder of the property. The revegetation plan, prepared by a qualified professional, is provided in Appendix M. As the project is still at the design phase, the plan is concise and will be refined in future revisions of the Rehabilitation Plan as additional information becomes available.

5 MONITORING PROGRAM

A summary post-operation and post-rehabilitation monitoring program is presented below. A detailed program will be submitted with the final Rehabilitation Plan and implemented following completion of the rehabilitation works. The program is proposed a duration of five (5) years, as recommended by the Directive 019 for leachable mine tailings storage areas. The contact information for the person responsible for monitoring programs is as follows:

Person in charge:	Cathryn Moffett Vice President – Environment and Permits
Phone:	(438) 334-4968
Email:	cmoffett@pmet.ca

5.1 ENVIRONMENTAL MONITORING

5.1.1 POST-OPERATION

Post-operation environmental monitoring of the Shaakichiuwaanaan mine site will be conducted over a period of four (4) years, corresponding to the duration of rehabilitation works. During the post-operational period, the mine water management system will remain in operation, and there will thus be a single final surface-water effluent, as during the operational phase. Groundwater monitoring will be carried out using a network of nine (9) observation wells, comprising three (3) wells around Stockpile 001, three (3) around Stockpile 002, and three (3) around the open pit. Sampling frequencies will comply with Directive 019 requirements:

- Twice per month for the first six (6) months and once per month thereafter for the final effluent;
- Twice per year for groundwater.

Analyzed parameters will be those required under Directive 019.

5.1.2 POST-REMEDICATION

Post-rehabilitation environmental monitoring will be conducted over a period of five (5) years. After the site is restored, there will be two (2) surface-water effluents at Stockpile 001 and two (2) effluents at Stockpile 002, due to the creation of breaches in the dikes of the water management ponds dikes. Thus, four (4) surface-water effluents will be monitored. Groundwater monitoring will use the same network of observation wells as presented for the post-operation phase. Sampling frequencies will comply with the requirements of D019, namely six (6) times per year for surface water and two (2) times per year for groundwater. Due to winter freezing conditions, all annual sampling events are scheduled between April and November. The parameters analyzed will be those required by D019.

5.2 MONITORING OF REHABILITATION TECHNIQUE PERFORMANCE

Performance monitoring of rehabilitation techniques applies only to Stockpile 002, as it is the only storage area being restored using a technique designed to limit the generation of contaminants.

This monitoring will primarily consist of visual inspections of the integrity of the geomembrane cover installed on Stockpile 002. Additionally, if instrumentation is deemed necessary to assess the performance criteria, it will be installed during the rehabilitation works. The data collected by the instrumentation will be processed and analyzed by the professional responsible for performance monitoring.

Monitoring will be conducted annually for five (5) years. A report meeting the requirements of the Guide (MRNF, 2024) will be provided to the MRNF following each monitoring event.

5.3 MONITORING AND MAINTENANCE OF STRUCTURAL INTEGRITY

All rehabilitation works will be carried out to ensure the long-term physical stability of site structures. Monitoring will be conducted once a year for a minimum period of five (5) years.

This monitoring will primarily consist of visual inspections of the former surface openings to note any anomalies that could compromise their stability or integrity. No stockpiles or ponds will remain on the Shaakichuwaanaan property.

The visual inspections will be used to verify the integrity of:

- Concrete slabs sealing the mine openings;
- Backfill securing access ramps;
- Waste rock and mine tailing storage area.

Inspections will take place annually for five (5) years. These inspections will be documented, and an inspection report compliant with the requirements of the Guide (MRNF, 2024) will be submitted to the MRNF after each monitoring event.

5.4 POST-REVEGETATION MONITORING AND MAINTENANCE

Post-vegetation monitoring during the post-rehabilitation period will continue for a minimum of five (5) years in the form of annual inspections, and for fifteen (15) years through inspections conducted every three years. Inspections will primarily consist of a visual assessment of parameters such as the plant condition, vegetation cover, soil erosion, and related indicators.

Following each site inspection, a report will be submitted to the MRNF annually for five (5) years. After this period, if applicable, a request to discontinue this monitoring will be submitted to the MRNF.

6 EMERGENCY PLAN

A preliminary emergency prevention and response plan for post-operation and post-rehabilitation activities has been developed. This plan includes a site description, the roles and responsibilities of stakeholders, and the response protocol based on the type of environmental emergency. The emergency plan will be reviewed regularly to ensure that the information provided remains up to date with the project's progress (changes in responsibility, positions, high-risk areas, etc.).

The emergency response plan is available in Appendix N.

7 MEASURES IN THE EVENT OF A TEMPORARY SUSPENSION OF ACTIVITIES

Table 7-1 summarizes the activities to be carried out in the event of a temporary shutdown of the site. The map in Appendix B4 also identifies the infrastructure locations where temporary shutdown measures are implemented.

Table 7-1 . Schedule for implementing safety measures and monitoring visits in the event of a temporary suspension of operations

Measures to be implemented during a temporary shutdown	Timeframe or frequency following the announcement of a shutdown
Access to the mining site will be prohibited, except for authorized personnel. Barriers will be set up at the site entrance. Access to buildings not required for use will be prohibited by means of padlocks. A guard will be present at the gate.	Upon cessation of mining operations
Open pits will be fenced off and monitored 24 hours a day, 7 days a week.	Upon cessation of mining operations
Explosives will be safely removed in accordance with the standards and regulations in effect in Quebec.	2 weeks after closure
The management and storage of chemicals and hazardous materials will be carried out safely in compliance with the standards and regulations in effect in Quebec.	2 weeks after closure
Drainage and wastewater treatment activities will continue (if required based on water quality).	Upon cessation of operations
Visual inspections will be conducted to ensure the physical stability of the infrastructure.	Once a week

8 ECONOMIC AND TIME-RELATED CONSIDERATIONS

8.1 ESTIMATION OF REHABILITATION COSTS

As required by section 232.5 of the *Mining Act*, the operator of the Shaakichiuwaanaan property must provide a financial guarantee equal to the anticipated costs of carrying out all work specified in the Rehabilitation Plan. This section presents the estimated rehabilitation costs for the Shaakichiuwaanaan property at site closure.

The cost estimate is directly influenced by the nature of the planned work, the sequence of implementation, and the time of year which certain rehabilitation activities are carried out. The estimate was prepared by GCM Enviro Synergies. The rehabilitation costs are summarized in Table 8-1, with detailed cost breakdowns provided in Appendix O.

8.2 BASIS FOR COST ESTIMATION

8.2.1 METHODOLOGY

The rehabilitation costs for Sections 1.1, 3.0, 4.0, and 5.0 of Table 8-1 and in Appendix O, were calculated using unit costs provided to GCM Enviro for similar mining projects. These costs, dating no later than May 2023, were adjusted to June 2025 using an inflation factor of 4.30%.

The cost estimates assume that there will be no remaining material on the overburden stockpiles, organic material stockpiles or ore stockpiles. Furthermore, it is assumed that the quantities of overburden and organic material available on site will be sufficient to meet rehabilitation needs, based on the site mass balance (GMS, 2025). The costs assume that 75% of the area to be restored will be graded and that 85% of the rehabilitated area will be revegetated using hydroseeding. All assumptions used for the cost estimate are indicated as notes in the cost table presented in Appendix O.

A cost for conducting a soil and pond sediment characterization study is included (Section 6.1 of the table in Appendix O), based on GCM Enviro's hourly rates, a laboratory bid, and publicly available laboratory analysis prices. In addition, the cost of remediation work (Section 6.2 of the table in Appendix O) was calculated using the method proposed in Appendix 6 of the 2024 *Guide for Preparing Mine Site Rehabilitation Plans in Québec*. Details of this approach are presented in Appendix P.

8.3 CALCULATION OF THE FINANCIAL GUARANTEE

The rehabilitation costs for the Shaakichuwaanaan property are summarized in Table 8-1 . The complete table is presented in Appendix O. The amount of the financial guarantee is equivalent to the anticipated costs for carrying out all the work planned in the site redevelopment and Rehabilitation Plan, namely CA\$249,102,400, including mobilization/demobilization costs of 5% of direct costs, indirect costs of 30% of direct costs, and a contingency of 20% of the sum of direct and indirect costs.

8.4 TYPE OF FINANCIAL GUARANTEE SELECTED

The financial guarantee (*Mining Regulation*, Section 115) to be provided by PMET will comply with the requirements set forth in the *Guide for the Preparation of Mine Site Rehabilitation Plans in Québec*(MRNF, 2024). The guarantee will take the form of a cash deposit transferred by bank wire to the Québec Minister of Finance.

The form of the guarantee will comply with sections 116 to 119 of the *Mining Regulation*, and payment will be made in accordance with section 113 of the Regulation.

The financial guarantee will remain in effect until issuance of the certificate of release.

Table 8-1 . Summary of Rehabilitation Costs for the Shaakichuwaanaan Mine

#Item	Description	Total
Direct Costs		
1.0	Site security	\$995,700
2.0	Dismantling, demolition, and decommissioning of surface infrastructure	\$10,996,200
3.0	Rehabilitation of newly disturbed land areas	\$6,495,600
4.0	Rehabilitation of storage areas	\$97,342,200
5.0	Rehabilitation of the water management system	\$11,278,800
6.0	Contaminated soil management	\$12,697,600
7.0	Monitoring costs	\$13,960,800
Subtotal direct costs		\$153,766,900
Indirect costs		
1.0	Mobilization and demobilization (5%)	\$7,688,300
2.0	Conceptual engineering for direct cost items (30%)	\$46,130,100
Indirect costs subtotal		\$53,746,800
Subtotal of direct and indirect costs		\$207,309,200
Other costs		
1.0	Contingency (20%)	\$41,517,100
Total costs including contingency		\$249,102,400

8.5 REHABILITATION WORK SCHEDULE

The Shaakichiuwaanaan property rehabilitation project comprises several implementation phases, as presented at Table 8-2 . All rehabilitation phases will take place over approximately four (4) years following the completion of operations. The post-rehabilitation phase will allow for agronomic monitoring, as well as monitoring of rehabilitation techniques and the stability of structures, to evaluate the rehabilitation process.

Table 8-2 . Schedule for rehabilitation work

Rehabilitation Work	Rehabilitation work period	Post-rehabilitation
Years	2050 to 2054	2055 to 2075
Site Securing		
Demolition of buildings		
Environmental characterization		
Rehabilitation of affected areas		
Rehabilitation of the waste rock pile and the co-placement pile		
Rehabilitation of settling ponds and cessation of effluent discharge		
Environmental monitoring		
Agronomic monitoring and monitoring of the integrity of post-rehabilitation structures		
Monitoring of rehabilitation technique performance		

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| Appendices