



Eskay Creek Revitalization Project

Socio-Economic Management Plan

17 August 2026



Eskay Creek Revitalization Project

Socio-Economic Management Plan

17 August 2026

Skeena Resources

Suite #2600, 1133 Melville Street
Vancouver, BC V6E 4E5

CONTENTS

ACRONYMS AND ABBREVIATIONS	III
SYMBOLS AND UNITS OF MEASUREMENT	IV
1.0 INTRODUCTION.....	1
1.1 Project Overview	1
1.1.1 Eskay Creek Mine Overview	1
1.1.2 Socio-Economic Considerations	2
1.2 Purpose and Objectives	3
1.3 Tahltan Interest	4
1.4 Legislation and Guidelines	6
1.4.1 Environmental Assessment Certificate Conditions	8
1.4.2 Federal Decision Statement Conditions	8
1.5 Consultation and Collaboration	8
2.0 REGIONAL SETTING.....	9
2.1 Local and Regional Monitoring Areas	9
2.2 Existing Conditions	11
3.0 SOCIO-ECONOMIC MONITORING AND MANAGEMENT.....	14
3.1 Monitoring Framework.....	14
3.2 Mitigation and Enhancement Measures.....	14
3.3 Data Sources and Collection.....	22
3.3.1 Publicly Available Data and Information	22
3.3.2 Project-Specific Data and Information	22
3.3.3 Population-Specific Data and Information	23
3.3.4 Annual Employee Survey.....	23
3.3.5 Community Feedback Protocol.....	24
3.3.6 Data Management	25
3.3.7 Caveats and Limitations.....	26
3.4 Approach to Monitoring	26
4.0 PLAN IMPLEMENTATION	28
4.1 Roles and Responsibilities	28
4.2 Reporting and Record Keeping.....	29
4.3 Adaptive Management	30
4.3.1 Employment Thresholds	33
5.0 PLAN REVISION	34
6.0 AUTHORSHIP/SUBMISSION RECORD	35
7.0 REFERENCES.....	36

LIST OF TABLES

Table 1-1: Relevant Legislation and Guidelines	7
Table 3-1: Socio-Economic Management Plan Monitoring Framework	15
Table 3-2: Mitigation and Enhancement Measures	18
Table 3-3: Community Feedback Protocol.....	25
Table 4-1: Eskay Creek Mine Environmental Management Roles and Responsibilities for Key Positions	28
Table 4-2: Adaptive Management Process for the Socio-Economic Management Plan	30
Table 6-1: Socio-Economic Management Plan Preparation	35

LIST OF FIGURES

Figure 2-1: Socio-Economic Local and Regional Monitoring Areas	10
--	----

APPENDICES

Appendix A	Table of Concordance
------------	----------------------

ACRONYMS AND ABBREVIATIONS

AOI	Area of Interest
BC	British Columbia
CAPEX	capital expenses
CFP	Community Feedback Protocol
DS	Decision Statement
EAC	Environmental Assessment Certificate
EAC Application	Application for an Environmental Assessment Certificate / Impact Statement
EAO	British Columbia's Environmental Assessment Office
EMLI	Ministry of Energy, Mines and Low Carbon Innovation (now Ministry of Mining and Critical Minerals [MCM] and Ministry of Energy and Climate Solutions)
EMS	Environmental Management System
ENV	Ministry of Environment and Climate Change Strategy (2017 to 2024), or Ministry of Environment and Parks (2024 to present)
GDP	Gross Domestic Product
HR	Human Resources
IAAC	Impact Assessment Agency of Canada
Indigenous Nations	Indigenous Nations identified by EAO Condition 22, which includes Tahltan Nation / Tahltan Central Government, the Tsetsaut Skii km Lax Ha, the Nisga'a Nation / Nisga'a Lisims Government, and Gitanyow Nation
MNBC	Métis Nation British Columbia
N/A	not applicable
NLG	Nisga'a Lisims Government
NH	Northern Health
OPEX	operating expenses
Project	Eskay Creek Revitalization Project
RDKS	Regional District of Kitimat-Stikine
Revised EAC Application	Revised Application for an Environmental Assessment Certificate / Impact Statement
SEMP; the Plan	Socio-Economic Management Plan
Skeena Resources / the Company	Skeena Resources Limited or Skeena Gold + Silver
TCG	Tahltan Central Government
TSKLH	Tsetsaut Skii km Lax Ha
YXT	Northwest Regional Airport Terrace

SYMBOLS AND UNITS OF MEASUREMENT

\$	dollar
%	percent
CDN	Canadian (dollar)
dmt	dry metric tonne
km	kilometre
Mt	million tonnes
Mt/year	million tonnes per year

1.0 INTRODUCTION

This Socio-economic Management Plan (SEMP; the Plan) for the Eskay Creek Revitalization Project (the Project) has been developed to meet the requirements of Condition 22, Socio-economic Management Plan, of the Project Environmental Assessment Certificate (EAC #M26-01). The SEMP is also informed by Condition 1, Document Review; Condition 2, Document Updates; Condition 3, Document Development; and Condition 4, Consultation. The SEMP outlines the approach for tracking and mitigating the potential socio-economic effects identified in the Revised Application for an Environmental Assessment Certificate / Impact Statement (Revised EAC Application) for the Project, submitted in April 2025 (Skeena Resources Limited [Skeena Resources] 2025a). The SEMP and updates to the SEMP made according to Section 5, Plan Revision, will be implemented throughout the Construction and Operations phases of the Project under the direction of a Qualified Person.¹

Appendix A, Table of Concordance, provides the table of concordance between the content of this SEMP and the requirements of the federal and provincial conditions² of the EAC.

The SEMP is structured as follows:

- Section 1, Introduction: provides a Project and workforce overview, defines the purpose and objectives of the SEMP, and establishes the regulatory framework;
- Section 2, Regional Setting: describes the monitoring areas and existing socio-economic conditions relevant to the purpose of the SEMP;
- Section 3, Socio-economic Monitoring and Management, and Section 4, Plan Implementation: outline the monitoring and management processes and implementation details for addressing socio-economic effects associated with the Project; and
- Section 5, Plan Revision, and Section 6, Authorship/Submission Record: document the Plan revision process and authorship/submission record.

1.1 Project Overview

1.1.1 Eskay Creek Mine Overview

Skeena Resources Limited (Skeena Resources or Skeena Gold + Silver)³ is seeking to commence the Project, a proposed open pit gold and silver mine located at the historical underground Eskay Creek Mine in northwestern British Columbia (BC), 83 kilometres (km) northwest of the town of Stewart within the District of Stewart, BC. The historical underground Eskay Creek Mine previously operated from 1994 to 2008 and was subsequently closed. The Project is within the Regional District of Kitimat-Stikine (RDKS) on Provincial Crown land mineral tenures held by Skeena Resources. The Project is approximately 170 km

¹ Condition 22.1 of the EAC defines a Qualified Person as someone with a minimum of 5 years' experience in the planning of socio-economic programs for natural resource development projects, unless otherwise authorized by the EAO.

² This SEMP does not address Tahltan Conditions, including those related to sociocultural monitoring and management. These conditions will be addressed separately by Skeena Resources.

³ Eskay Creek Mining Limited (Ltd.) is a wholly owned subsidiary of Skeena Resources Limited (Skeena Resources) and will be the holder of all permits and authorizations. References to Skeena Resources Limited as the Project proponent in this management plan should be understood to be the same as Eskay Creek Mining Ltd.

south via road of the community of Iskut, and 451 km north via road from Terrace, BC. The Project is accessed via the existing Eskay Creek Mine Access Road (Eskay Creek MAR), a 59 km all-season gravel road that connects to Highway 37 (the Stewart-Cassiar Highway). The Project is within Tahltan Territory and TSKLH Territory.⁴ The Transportation Corridor passes multiple territories and jurisdictions, including Tahltan Territory and TSKLH Territory, the Nass Area and Nass Wildlife Area of the Nisga'a Nation, Gitanyow Nation Territory, and the lands used by Métis Nation British Columbia (MNBC) members.

The Project will develop two open pits (North and South pits). Ore will be milled onsite in a crushing, comminution, and flotation circuit Process Plant to generate a gold-silver concentrate. Processing capacity will initially be 3.0 million tonnes per year (Mt/year) and will be expanded to 3.6 Mt/year in approximately the sixth year of mining. The 3.6 Mt/year Process Plant capacity will be maintained through to the end of Operations. A new non-potentially acid generating Mine Rock Storage Area will be developed adjacent to the pits, while tailings and potentially acid generating mine rock will be stored within the existing Tom MacKay Storage Facility. The Tom MacKay Storage Facility will be expanded with north and south embankments in phases. The approximately 130,000 dry metric tonnes (dmt) of gold-silver concentrate produced by the Project will be hauled from the mine site to existing offsite ports in the District of Stewart and then shipped by marine vessels to an overseas smelter.

Construction of the Project will take 2 years to complete. There will be a 13-year Operations phase that consists of 10 years of mining and milling and 3 years of ore stockpile milling (no mining). The Project will require the construction and use of new infrastructure such as a Process Plant near the open pits, haul roads and secondary roads, additional waste rock disposal capacity, surface water management structures, and a water treatment facility. The Project will be progressively reclaimed, so that the Reclamation and Closure phase takes 3 years, with Post-closure water treatment and monitoring occurring until permit requirements are met.

1.1.2 Socio-Economic Considerations

The Project will have implications for the local and regional economy and could require the use of community infrastructure and services (e.g., roads, landfills, and emergency services), either through direct activities or due to the presence of the Project workforce. The Project will contribute economically through the procurement of goods and services and through tax revenues.

The Construction workforce is estimated to average 759 workers in full-time positions and is estimated to peak at up to 949 workers in Year -2. The Operations workforce is estimated to include up to 771 workers in full-time positions. During Construction and Operations, the Project will operate 24 hours a day, 7 days a week, 365 days per year. Positions will operate on a 12-hour shift basis and primarily use a rotation schedule of 2 weeks on / 2 weeks off. Additional worker rotation schedules will be considered through the development of the Project and discussions with Indigenous Nations.

Project workers (including direct Skeena Resources employees and contractors) will access the Project site by flying to Terrace (Northwest Regional Airport Terrace [YXT]) on charter air flights or commercial airlines where necessary, followed by bus or van transport to the onsite camp) at the Project site. Workers living in Telegraph Creek, Iskut, Dease Lake, or Smithers may be transported directly to the site

⁴ For the purposes of this management plan, "territory" is defined as the established or asserted traditional territories of Indigenous Nations.

by van or truck. While on rotation, Project workers will be accommodated at the onsite camps. Skeena Resources may occasionally use camps owned and operated by other entities, such as Forrest Kerr Camp located near KM37 of the Eskay Creek MAR.

1.2 Purpose and Objectives

The SEMP fulfills the requirements outlined in EAC Condition 22, Socioeconomic Management Plan.

The purpose of this SEMP is to enable monitoring of, and adaptive responses to, Project-induced socio-economic effects predicted in Chapter 21, Infrastructure and Services Effects Assessment, and Chapter 24, Employment and Economy Effects Assessment, of the Revised EAC Application, for communities within the local and regional area. Monitoring of Project-induced socio-economic effects will identify how the Project contributes (both positively and adversely) to the socio-economic context of the local and regional communities. This monitoring process will also assess the effectiveness of mitigation measures and identify the need for adaptive management.

The objectives of the SEMP are to:

- Guide the process for consistently compiling data that supports socio-economic monitoring;
- Identify management and mitigation measures to address socio-economic effects;
- Outline the process for receiving and addressing feedback on the Project; and
- Outline the approach to adaptive management of unexpected effects.

Additional objectives for the SEMP identified by Tahlitan are provided in Section 1.3, Tahlitan Interest.

The SEMP has been prepared in a manner that considers cultural safety and humility for diverse population groups.

The following socio-economic and Project-specific topics are within the scope of the SEMP:

- The influence of population changes and the implications of those changes on infrastructure and services, including pressure on:
 - Healthcare services and facilities,
 - Utilities (including waste management),
 - Education and daycare services and facilities,
 - Transportation infrastructure,
 - Availability and affordability of housing, and
 - Emergency services and law enforcement services;
- Employment of, and income earned by local and regional residents, including Indigenous Nations;
- The number and value of contracts awarded to local and regional businesses, including Indigenous-owned businesses;
- Payment of taxes by the Project and the potential flow of other payments to local and regional communities; and
- Cost of living in the local and regional communities.

This SEMP is consistent with and supplemental to other management plans prepared for Skeena Resources as part of the environmental assessment process. Management plans required by BC's Environmental Assessment Office (EAO) that are related to the SEMP include the following:

- Health and Medical Services Plan;
- Transportation Corridor Management Plan;
- Social Closure Plan;⁵
- Tahltan Food Sovereignty Plan;
- Tahltan Way of Life Plan;
- Tahltan Sociocultural Measures Plan; and
- Tahltan Health Plan.

1.3 Tahltan Interest

The Eskay Creek Mine is located within the Province of British Columbia (BC) and within Tahltan Territory. The Tahltan Nation have Title and Rights, including self-governing rights, throughout Tahltan Territory and have a unique relationship to and connection with the land, water, and resources throughout Tahltan Territory. The Tahltan Central Government (TCG) is the administrative governing body of the Tahltan Nation.

In 1910, the Tahltan Tribe signed a Declaration to guide all land, water, and resource decisions on Tahltan Territory, and sets out fundamental Tahltan Values that remain central to Tahltan governance of the land, water, and resources in Tahltan Territory. The Tahltan reaffirmed the *1910 Declaration of the Tahltan Tribe* (Tahltan Tribe 1910) on its 100th anniversary on 18 October 2010.

In 1987, the Tahltan Tribal Council released the Resource Development Policy Statement that indicates that “[b]efore a resource development project can commence within Tahltan tribal territory, it will be necessary for the developer and the Tahltan Tribal Council to enter into a project participation agreement” (Tahltan Tribal Council 1987).

In March 2013, the Tahltan Nation (TCG, Tahltan Band, and Iskut First Nation) and BC entered into a Shared Decision-Making Agreement, the purpose of which is as follows:

- 2.1. This agreement is intended to foster an effective, respectful and enduring government to government relationship that will:
 - 2.1.1. allow the Parties to collaborate on land and resource issues as a tangible step towards longer term reconciliation of their interests; and
 - 2.1.2. enable the implementation of the structures and processes outlined in this agreement.

In 2019, the provincial government passed the *Declaration on the Rights of Indigenous Peoples Act* (Declaration Act; 2019), which establishes the United Nations' *Declaration on the Rights of Indigenous*

⁵ The Social Closure Plan is part of Condition 24 of EAC #M26-01 and will be developed a minimum of 2 years prior to the planned commencement of Reclamation and Closure.

Peoples (United Nations 2007) as BC's framework for reconciliation, as called for by the Truth and Reconciliation Commission's Calls to Action (National Inquiry into Missing and Murdered Indigenous Women and Girls 2019).

The Declaration Act (2019) aims to create a path forward that respects the human rights of Indigenous Peoples, while introducing better transparency and to cooperate in good faith with Indigenous Peoples through their own representative institutions, in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources.

In 2022, following the Declaration Act (2019), Her Majesty the Queen in Right of the Province of BC, as represented by the Premier, the Minister of Environment and Climate Change Strategy, and the Minister of Indigenous Relations and Reconciliation, made an agreement with the Tahltan Nation that BC will undertake a consent-based decision-making process for the approval for the Project. Under this agreement, the Tahltan Nation and BC will engage in a cohesive and comprehensive processes to support informed decision-making. Within the area of the *Declaration Act Consent Decision-Making Agreement for Eskay Creek Project* (2022), within which the Project lies, the consent of the TCG is required prior to a project being undertaken.

The Tahltan Nation are the rights holders and stewards of the lands, waters, and resources directly affected by the Eskay Creek Project and the associated Eskay Creek MAR and Transportation Corridor. The TCG represents the collective interests of the Tahltan people, including the Iskut Band and Tahltan Band, and is a primary governance partner in the development and implementation of this SEMP.

The following information was presented in Chapter 4, Tahltan Application Information, of the Revised EAC Application (Skeena Resources 2025a, 4-2) for the Project:

The word Tahltans use to describe our relationship to the land is Keyeh. This word is usually translated as village or place, but it means much more than this. Keyeh also means home—our home—the unique place where as Tahltans we belong. Keyeh can encompass all the country now called Tahltan Territory, it can refer to Tahltan village on the Tūdeṣe chō (Stikine) River, which is the spiritual centre of the Tahltan homeland, or it can simply refer to a village. Keyeh includes the specific geographic and environmental characteristics of our country, just as it includes all of its residents, human and non-human (Higgins 1982). It is an interconnected whole made up of the relationships between humans, animals, spirits, mountains, waters and weather systems. This whole has a cultural and spiritual meaning—the place that is home for us. As such, Tahltan Territory must be understood in its entirety, that is, as Tahltan's home.

The Tahltan view of stewardship arises from understanding the relationship Tahltan have to Keyeh. Belonging to the land means there is a reciprocal relationship between us and the land. A Tahltan Elder, says, "If we take care of the land, the land will take care of us." From Tahltan's perspective, stewardship is not only about looking after certain features of the land (for example, dēk'āne (salmon) habitat, hodzih (caribou) migratory routes, soil quality, heritage sites, and so forth), but requires attention to the relationships between these features. Keyeh, is an interconnected whole made up of reciprocal relationships. The human community is part of a larger community.

This means that adverse impacts to the land change the relationships that Tahltan have with the land. Tahltan identity, cultural integrity, community cohesion and individual well-being are connected to the health of the land. Tahltan stewardship means maintaining good relationships to the land (and by “land” we always mean the entirety of land, including all living things, spirits, waters, and mountains, and the relationships between them), across space and through time. It means honouring our ancestors that came before us and caring for the generations still to come. We call this the Tahltan Continuum (Klappan Strategic Initiative, 2015).⁶

Further, from Chapter 4, Tahltan Application Information, of the Revised EAC Application (Skeena Resources 2025a, 4-3):

Humans are part of the ecosystems and human actions have to be done in a way where the health of the ecosystems are not impaired. Tahltan oral histories, laws, and principles all indicate where these actions are not followed, significant impacts occur and relationships with the land and water are damaged to the detriment to all Tahltan.

Tahltan stewardship practices area guiding principles in the implementation of the Tahltan Risk Assessment for this Project. The Tahltan Risk Assessment was considered in the development of mitigation for this SEMP. These include the principles and criteria identified as the Tahltan Core Priorities (Chapter 4, Tahltan Application Information, Revised EAC Application [Skeena Resources 2025a, 4-4]):

Priority 1. Maintaining the long-term health of the land (including all of its terrestrial and aquatic ecosystems) is a mandatory condition for any kind of land use in all areas within Keyeh.

Priority 2. The land must be able to continue supporting our Tahltan way of life while meeting the “health of the land” condition established under priority 1. Tahltan way of life includes maintaining our personal connection with Keyeh, being able to live off the land, sustaining our harvesting and hunting patterns, engaging in our cultural and spiritual practices, most of which are tied to the land, and earning a reliable living.

Priority 3. Tahltan rights and title must be protected, upheld, and continue to be exercisable for current and future generations.

Priority 4. Land that has been impacted or degraded through industrial use must be healed, through reclamation, restoration, and ritual ceremony to support priorities 1, 2, and 3.

Alignment with the Tahltan Stewardship Plan is a core objective of the SEMP. The measures presented in this SEMP are intended to mitigate potential social effects, and the ways in which those impacts can affect Tahltan people and their way of life. The Tahltan Area of Consent is presented on Figure 2-1.

1.4 Legislation and Guidelines

The SEMP is subject to applicable provincial legislation and policies detailing employment standards, health and safety standards, and the environmental assessment process with its associated requirements. The Plan’s development was also informed by industry guidelines and best practices. These requirements and guidelines are described in Table 1-1.

⁶ Source: Tahltan Central Council and Government of BC (2015)

Table 1-1: Relevant Legislation and Guidelines

Legislation or Guidance Document	Year	Type	Level of Government	Relevance to the SEMP
<i>United Nations Declaration on the Rights of Indigenous Peoples Act (2021)</i>	2021	Legislation	Federal	This Act requires the Federal Government to ensure the laws of Canada are consistent with the United Nations Declaration on the Rights of Indigenous Peoples. This Act informed the SEMP's overall approach to integrating Indigenous rights, particularly in the case of developing mitigation and management measures in Section 3.2, Mitigation and Enhancement Measures.
<i>Declaration on the Rights of Indigenous Peoples Act (2019)</i>	2019	Legislation	Provincial	This Act establishes the United Nations Declaration on the Rights of Indigenous Peoples as the provincial framework for reconciliation. This Act informed the SEMP's overall approach to integrating Indigenous rights, particularly in the case of developing mitigation and management measures in Section 3.2, Mitigation and Enhancement Measures.
<i>Employment Standards Act (1996)</i>	1996	Legislation	Provincial	This Act sets standards for employment conditions in BC, such as compensation and working conditions. This Act informed the SEMP's overall approach to developing mitigation measures in Section 3.2, Mitigation and Enhancement Measures.
<i>Health, Safety and Reclamation Code for Mines in British Columbia (EMLI 2024)</i>	2024	Legislation	Provincial	This code outlines requirements for mines to reduce health, safety, and environmental risks. This Code informed the SEMP's overall approach to developing mitigation measures in Section 3.2, Mitigation and Enhancement Measures.
<i>Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls (National Inquiry into Missing and Murdered Indigenous Women and Girls 2019)</i>	2019	Guidance	NA	This report includes calls for justice for extractive and development industries to consider during all stages of project planning, assessment, implementation, management, and monitoring. This document informed Section 3.1, Monitoring Framework, and Section 3.2, Mitigation and Enhancement Measures, including the selection and development of indicators and mitigation measures. It also informed Section 3.3.3, Population-specific Data and Information, through supporting an understanding of disproportionate effects.

Notes:

BC = British Columbia; EMLI = Ministry of Energy, Mines and Low Carbon Innovation; N/A = not applicable; SEMP = Socio-Economic Management Plan

1.4.1 Environmental Assessment Certificate Conditions

The EAO issued EAC #M26-01 to authorize Skeena Resources to construct and operate the Project. The EAC contains a number of Conditions, of which Condition 22 requires the development of this SEMP. In addition, Condition 3 contains requirements that pertain to all management plans developed for the EAC. Appendix A, Table of Concordance, provides a table of concordance to the EAC requirements for this SEMP.

1.4.2 Federal Decision Statement Conditions

The Impact Assessment Agency of Canada (IAAC) has issued a federal Decision Statement (DS). It contains a number of conditions; this Plan meets the requirements of Condition 5 of these conditions. In addition, Condition 2 describes requirements that pertain to all follow-up programs developed for the Revised EAC Application. Appendix A, Table of Concordance, provides a table of concordance with the IAAC requirements for this SEMP.

1.5 Consultation and Collaboration

In accordance with EAC Condition 4, Consultation, Skeena Resources provided written notice to NLG, TSKLH, Gitanyow Nation, and Northern Health (NH) on December 11, 2025. The written notice included the draft SEMP and an invitation for the recipients to provide their views on the content of the SEMP. Skeena Resources requested comments by January 16, 2026.

Skeena Resources recognizes that collaboration with the TCG is essential and must be approached in a respectful and meaningful way, with the shared goal of achieving consensus. To support the construction schedule, Skeena Resources received TCG approval to distribute the SEMP for consultation prior to collaborating. A copy of the SEMP was shared with TCG for their information at the same time as the plan was shared with the consulted parties. TCG reviewed the plan in parallel with the EAO, and comments were addressed in v2.0. Collaboration with TCG will continue throughout the lifetime of the Plan.

2.0 REGIONAL SETTING

2.1 Local and Regional Monitoring Areas

The Revised EAC Application delineates socio-economic local and regional assessment areas to frame the assessment of potential effects on communities or regions. Specifically, these assessment areas included sparsely populated communities and regions, which can create challenges for reporting socio-economic data at a disaggregated level. Small populations increase the risk of confidentiality and privacy concerns, including the potential identification of individuals. Additionally, larger communities were anticipated to have more direct interactions with the Project, for example, through direct employment, as transportation hubs for the fly-in/fly-out workforce, prioritization of local and regional procurement, and their proximity to the transportation corridors and port facilities.

To address these considerations and support meaningful monitoring, this Plan leverages the assessment areas defined in the Revised EAC Application and further refines them to enable effective, targeted monitoring and reporting. Specifically, the following socio-economic monitoring areas are the focus of this SEMP (Figure 2-1):

Local monitoring area:

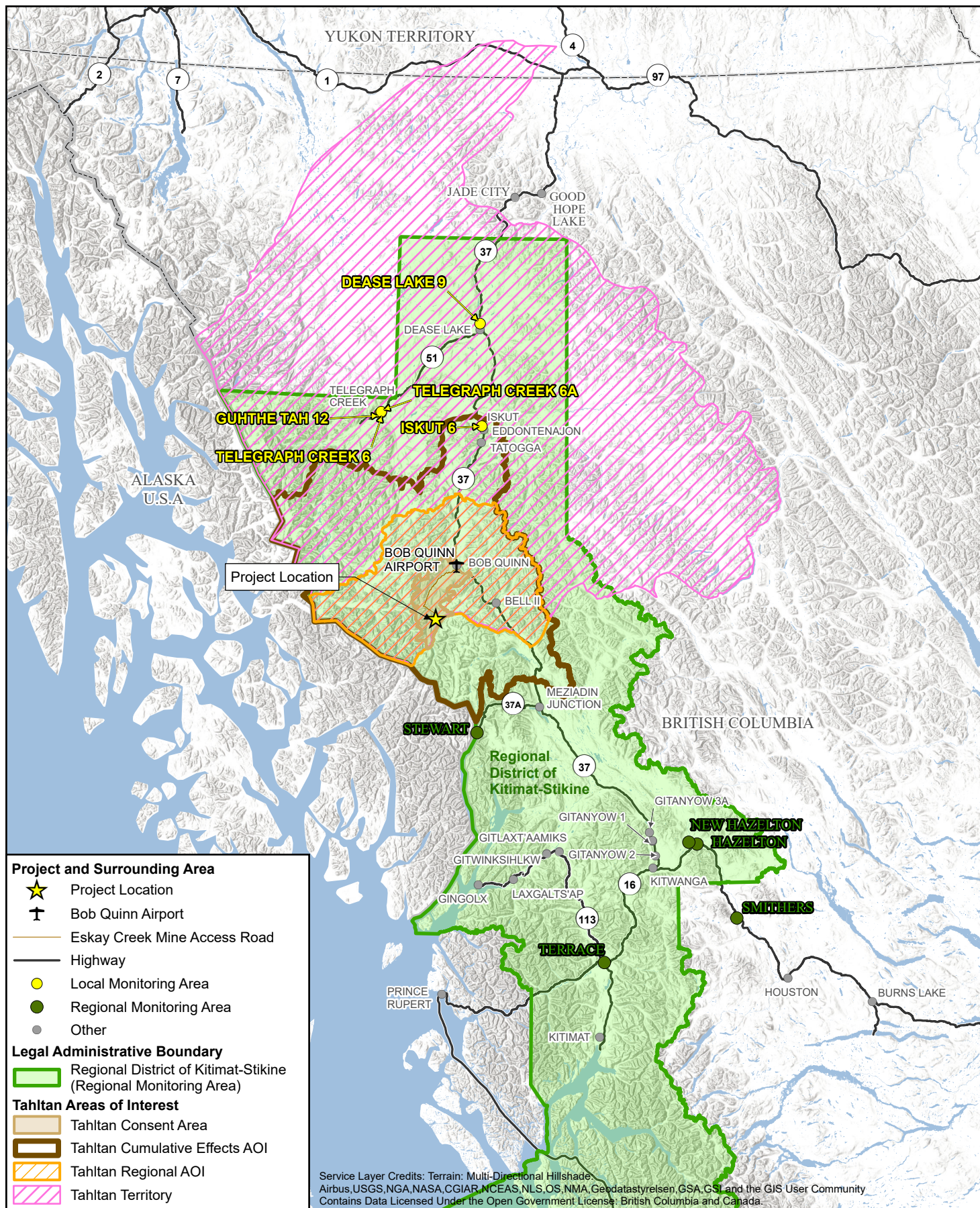
- The Tahltan communities: Tl̓égōh̓n (Telegraph Creek; which includes the Telegraph Creek 6 and 6A and Guhthe Tah 12 reserves), Tat'l'ah (the Dease Lake 9 reserve), and Łuwechōn (the Iskut 6 reserve).

Regional monitoring area:

- Municipalities: City of Terrace, Town of Smithers, District of Stewart, Village of Hazelton and District Municipality of New Hazelton; and
- RDKS.

The delineation of these areas balances the need for community-specific monitoring with the requirement to protect confidentiality, while also maintaining a focus on the communities most likely to experience measurable socio-economic effects.

Broadly, the socio-economic monitoring areas defined for the purpose of this SEMP encompass most of the assessment areas identified in the Revised EAC Application, as well as Tahltan Territory, the Tahltan Consent Area, the Tahltan Cumulative Effects AOI, and the Tahltan Regional Area of Interest (AOI; Figure 2-1). For simplicity, this SEMP refers to the socio-economic local and regional monitoring areas collectively as local and regional communities and/or areas.



Skeena Gold + Silver

Date: 24-Nov-2025

Figure: 2-1

Author: TEEM GIS

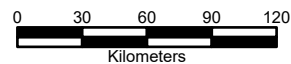


Figure 2-1: Socio-economic Local and Regional Monitoring Areas

Skeena Mining Division - NTS 104B09
British Columbia, Canada

Scale: 1:3,500,000

Coord. System: NAD 1983 UTM Zone 9N



2.2 Existing Conditions

Existing conditions provide a foundation for the monitoring activities described in Section 3, Socio-Economic Monitoring and Management, of this SEMP. The following subsections summarize existing conditions relevant to the predicted Project-induced effects, as described in the Revised EAC Application and relevant to the local and regional areas (Skeena Resources 2025b, 2025c).⁷

Population and Demographics

In 2021 (the most recent census), the total population of the RDKS was 37,790, representing 0.8 percent (%) of the provincial population. The Tahltan communities of Tl̓egōh̓n, Tat'l'ah, and Łuwechōn had a combined population of 725 in 2021, with nearly all residents identifying as Indigenous. The City of Terrace, Town of Smithers, District of Stewart, Village of Hazelton, and District Municipality of New Hazelton had a combined population of 18,771, with approximately 19.7% of residents identifying as Indigenous. About 31.8% of the RDKS population identified as First Nations, with smaller proportions of Métis and other Indigenous-identifying residents.⁸ The population in the local and regional area is expected to grow over the next 20 years, with the Indigenous population projected to grow at a higher rate than the non-Indigenous population.

Employment and Income

Major industries in the RDKS include healthcare and social assistance, construction, retail trade, educational services, and public administration. In 2021, the RDKS had 18,835 workers in the labour force,⁹ with an employment rate of 55.4% and an unemployment rate of 10.3%. The City of Terrace, Town of Smithers, District of Stewart, Village of Hazelton, and District Municipality of New Hazelton had 20,090 workers, with an employment rate of 63.2%. Tahltan communities had 320 workers, with an employment rate of 50.0%. In general, active or successful participation in the labour force is limited by a lack of well-paying jobs, a lack of education and training, and the remoteness of small communities.

In 2020, much of the local and regional area had median employment income below the provincial median (40,800 dollars [\$] in Canadian dollars [CDN]¹⁰), although some larger communities (including Terrace, Smithers, and Stewart) had higher median employment incomes. In the local and regional areas, gendered dynamics are present in employment and income trends. Men+¹¹ were more likely to be employed in mining, quarrying, and oil and gas extraction, and women+ were more likely to work in education, healthcare and social assistance, and public administration. Women+ were more likely to earn lower wages compared to men+.

⁷ Detailed citations for the information presented in this section can be found in the Revised EAC Application, except for one source that was added to reflect updates to healthcare infrastructure in the region.

⁸ "Other" grouping can include Inuk (Inuit) or multiple responses.

⁹ Labour force refers to the population 15 years of age and over who were either employed or unemployed during the week of 2 to 8 May 2021.

¹⁰ All dollar amounts in this SEMP are provided in CDN.

¹¹ "Women+" and "men+" are statistical terms defined in the 2021 Census to represent the data aggregation of the nonbinary population into the binary categories of women and men to protect the privacy of nonbinary respondents. Women+ represents data on women and some nonbinary people, and men+ represents data on men and some nonbinary people (Statistics Canada 2023).

Economy and Taxation

Key sectors that contribute to BC's Gross Domestic Product (GDP) are: agriculture, forestry, fishing and hunting; mining, quarrying, and oil and gas extraction; and construction. Mining has become increasingly important to BC's GDP in the past few years, with the contribution of mining gold and silver to the GDP in BC nearly tripling over the last 10 years. Most businesses in the local and regional area are small, focussing on serving residents and employing fewer than 10 people. Businesses in the local and regional area face challenges due to a lack of resources to accomplish major projects, geographic isolation, and a shortage of workers.

Housing and Cost of Living

In Tahltan communities and the surrounding local area, housing affordability and availability are prevalent socio-economic challenges, with housing quality also decreasing in recent years. Many Tahltan members who live outside of Tahltan Territory report that the lack of available, affordable, and adequate housing is a barrier to returning to Tahltan communities. In 2024, changes to BC's housing legislation allowed for increased development of multi-unit and secondary unit housing, which may increase housing availability.

Food security in BC is a key socio-economic and public health issue, with rising costs of nutritious foods contributing to an overall rising cost of living. Female single parents, households on social assistance, seniors relying on public pensions, and Indigenous people are more likely to experience food insecurity. Country food harvesting is often practised by Indigenous people to support dietary and cultural needs and can assist in managing food costs through supplementing store-bought food or generating income through sales. Tahltan members report that natural cycles of wildlife movements and behaviour, along with other factors, can impact hunting frequency and success.

Local and Regional Services

Access to healthcare in the local and regional area is limited by factors such as long distances between healthcare facilities and capacity challenges facing these facilities, including difficulties recruiting healthcare professionals. These challenges increase with the remoteness of communities, particularly for Tahltan communities. The new Ksyen Regional Hospital in Terrace opened in November 2024 at more than double the size of the previous local hospital, contributing to increased healthcare capacity in the RDKS (BC Gov News 2024).¹² Additions to the Provincial Rural Retention Incentive¹³ in 2024 expanded eligibility to several local and regional communities, which may also contribute to increased healthcare capacity. Emergency services in Terrace, Smithers, Dease Lake, and Kitwanga/Gitwangak have reported capacity challenges in recent years, including shortages of ambulances and paramedics. This has resulted in long ambulance waiting times and redirection of patients to larger hospitals, which particularly affects rural residents. However, salary increases and benefit offerings have supported improved paramedic recruitment in recent years. Barriers to accessing healthcare are compounded for Tahltan members and other Indigenous peoples in the local and regional area, due to a lack of key services in communities, such as a pharmacy, systemic barriers, as well as a lack of cultural understanding between healthcare providers and Indigenous clients.

¹² The Ksyen Regional Hospital was not open at the time of drafting the Revised EAC Application but represents a key change to the infrastructure and services available in the RDKS. As such, updated information that was not available in the Revised EAC Application was sourced from the Government of BC and included in this section.

¹³ This incentive entails funding up to \$8,000 per year per person for healthcare workers living and working in rural and remote communities.

Social services in the local and regional area include resources and support targeted toward women, housing, and shelter services; counselling and mental health services; employment and training support; early childhood and infant development services; adult learning services; transit; multicultural services; and community-gathering spaces. Many of these services are not available in Tahltan communities or are offered sporadically. There is generally insufficient access to daycare services. To address this, the Government of BC is supporting the creation of 128 licensed daycare spaces in Kitwanga/Gitwangak (51 new spaces planned), Smithers (59 spaces), and Terrace (18 spaces). Post-secondary education in the local and regional area is available through the Northern Lights College campus in Dease Lake, Coast Mountain College, University of Northern British Columbia, Wilp Wilxo'oskwhl Nisga'a Institute, and online programs through the Contact North BC Program and other remote education providers. Many Tahltan members who live outside of Tahltan Territory have indicated that access to education is the primary reason why they live outside of Tahltan Territory.

Infrastructure and Utilities

In the RDKS, key transportation infrastructure includes Highways 37, 37A, 16, and 113, local roads, forest service roads, and mine access roads. Improvements to road infrastructure are currently underway to widen the shoulders along Highway 37 and expand connectivity along highways. The capacity of waste management facilities in the local and regional area has been strained in recent years due to increased demand for waste disposal from industrial projects along the Highway 37 corridor. In February 2023, the Province of BC provided \$8 million to Terrace and the RDKS to upgrade the Terrace landfill and the regional district's waste management facility.

3.0 SOCIO-ECONOMIC MONITORING AND MANAGEMENT

Socio-economic monitoring tracks how the Project influences social and economic conditions over time. This involves monitoring conditions in communities described in Section 2.1.1, Local and Regional Monitoring Areas, of this Plan, using designated indicators and metrics, and comparing them to the effects predicted in the Project's Revised EAC Application. The following sections describe the key components of socio-economic monitoring under this SEMP.

3.1 Monitoring Framework

The first step in socio-economic monitoring is the development of a well-designed monitoring framework. This framework (outlined in Table 3-1) identifies the potential effects and Project-specific predictions for each effect, specifies the Project phase when each effect is expected to occur, and outlines the mitigation measures to reduce or eliminate adverse effects while enhancing beneficial ones. It also defines the indicators and metrics that will guide data collection and reporting.

The monitoring framework covers the socio-economic effects identified in the Revised EAC Application and the requirements of EAC Condition 22.

The Revised EAC Application identified instances where potential effects may disproportionately affect diverse populations. In some cases, this may mean unequal access to Project benefits, such as employment, income, or training opportunities, or increased risk of experiencing adverse effects. These potential disproportionate effects are noted in Table 3-2 under "Gender Based Analysis Plus Considerations" and are considered further in Section 3.3.3, Population-specific Data and Information.

3.2 Mitigation and Enhancement Measures

Mitigation measures are actions designed to avoid, minimize, or eliminate the adverse effects of the Project, while enhancement measures are intended to maximize Project benefits. If monitoring shows that effects are not occurring as predicted, or that mitigation is not effective, this can trigger adaptive management, including adjustments to existing measures or the introduction of new ones.

For the socio-economic environment and the predicted Project effects, Skeena Resources has identified various mitigation and enhancement measures in the Revised EAC Application. Additionally, EAC Condition 22 requires the implementation of hiring and training measures, which must be informed by consultation with TCG, NLG, TSKLH, Gitanyow Nation, and NH, and the incorporation of gender equity and diversity measures and practices. Skeena Resources has also considered cultural safety and humility throughout the development of this SEMP and associated mitigation measures.

Table 3-1: Socio-Economic Management Plan Monitoring Framework

Topic	Potential Effect	Relevant Prediction	Gender Based Analysis Plus Considerations	Phase	Mitigations	Indicators	Data Source(s)
Population	Change in population	- No substantive population change predicted during Construction - In-migration of up to 435 individuals to the Terrace and Smithers (approximately 218 individuals or 75 families per community) during Operations - Out-migration of up to 430 individuals from Terrace and Smithers (approximately 215 individuals from each community) during Reclamation and Closure and Post-closure	None identified for this effect directly; however, change in population is a pathway for other effects where potential disproportionate effects are identified. ¹	Increase during Construction and Operations	Recruitment and Selection Policy	- Population estimates in local and regional communities - Number of Project workers relocating to or from local and regional communities - Number of Project workers by community of residence	- BC Data Catalogue - Skeena Resources and contractors
Employment and Economy	Changes in employment and income	- Up to 949 direct jobs during peak Construction, including 294 local and regional jobs (including Tahltan and the rest of the RDKS), and average wages of \$113,268 - Up to 771 direct jobs during peak Operations, including 334 local and regional jobs, and average wages of \$112,888 - Up to 79 direct jobs during Reclamation and Closure, including 21 local and regional jobs, and average wages of \$90,187	Disproportionate effect by gender, Indigeneity, age, ability, geography, family structure, income and employment, and education and skills.	Increase during Construction and Operations	- Recruitment and Selection Policy - Professional Development Policy - Gender Equity and Diversity - Hours of Work and Overtime Policy - Annual Work Performance Evaluation Policy - Crew Rotational Travel Policy - Workplace Violence Policy - Workplace Bullying and Harassment Policy - Drug and Alcohol Policy - Indigenous and Cross-Cultural Awareness Training - Specialized Courses and Certification - Mentorship Program, including Tahltan Mentorship Program - Internship Program - Apprenticeship Program - Regional Collaboration Initiative - Social Closure Plan, including the Workforce Transition Plan	Employment - Total workforce headcount and effort (hours) for Skeena Resources and contractors - Total workforce headcount and effort (hours) for Skeena Resources and contractors, by gender - Total workforce headcount and effort (hours) for Skeena Resources and contractors, by Indigenous identity - Total workforce headcount and effort (hours) for Skeena Resources and contractors, by ethnicity Income - Total income paid to Project workers (\$), by local and regional communities - Total income paid to Project workers, by gender (\$) - Total income paid to Project workers, by Indigenous identity (\$) - Total income paid to Project workers, by ethnicity (\$)	Skeena Resources and contractors
	Changes in Project expenditures, business opportunities, and GDP benefits	\$55.5 million in Project expenditures to Tahltan and \$61.5 million in Project expenditures to the rest of the RDKS during Construction \$818.4 million in GDP (for all of Canada) during Construction \$369.3 million in Project expenditures to Tahltan and \$329.8 million in Project expenditures to the rest of the RDKS during Operations \$2,352.9 million in GDP (for all of Canada) during Operations \$19.0 million in Project expenditures to Tahltan and \$19.0 million in Project expenditures to the rest of the RDKS during Reclamation and Closure \$94.9 million in GDP (for all of Canada) during Reclamation and Closure	None.	Increase during Construction and Operations	- Procurement Policy - Regional Collaboration Initiative - Social Closure Plan, including Workforce Transition Plan	- Total Project spend (\$) by key category (including CAPEX, OPEX, and Reclamation and Closure) - Total procurement contract spend, by community or region and as percentage of the total - Total procurement contract spend for Indigenous businesses (\$) and as a percentage of the total	Skeena Resources
	Changes in tax revenue	\$221.6 million from all sources during Construction \$2,194.0 million from all sources during Operations \$3.6 million during Reclamation and Closure	None.	Increase during Construction and Operations	No specific mitigation measures	- Federal, provincial, and municipal taxes paid by the Project (\$) - Royalty payments and other discretionary payments, if not confidential (\$)	Skeena Resources

Topic	Potential Effect	Relevant Prediction	Gender Based Analysis Plus Considerations	Phase	Mitigations	Indicators	Data Source(s)
Employment and Economy <i>(cont'd)</i>	Changes to the cost of living	Potential increase in cost of living during Construction and Operations due to in-migration and higher wages and salaries offered at the Project	Disproportionate effect by gender, Indigeneity, age, ability, family structure, and income and employment.	Increase during Construction and Operations	No specific mitigation measures	- Change in market basket measure for BC rural communities and BC communities with population under 30,000 (compared against median family income)³ - Change in provincial Consumer Price Index, by category (%) - Cost of living information collected through the Annual Employee Survey	Statistics Canada
Infrastructure and Services	Pressure on healthcare services and facilities	- Potential occasional acute care needs from accidents or incidents onsite and during worker transit to and from the Project site - Potential increased demand for services due to in-migration - Potential occasional demand for services due to traffic-related injuries associated with the Project	Disproportionate effect by Indigeneity, age, ability, geography, family structure, and income and employment.	Pressure during Construction and Operations	- Recruitment and Selection Policy - Procurement Policy - Health and Safety Management System - Mine Emergency Response Plan - Health and Medical Services Plan - Incident Reporting and Incident Investigation Procedure - Employee Assistance Program - Drug and Alcohol Policy - CFP	- Number of times Project workers use onsite medical facilities, for both work-related and non-work-related reasons⁴ - Number of times Project workers are referred by Skeena Resources to offsite medical facilities, for both work-related and non-work-related reasons	Skeena Resources
	Pressure on utilities (waste management)	Potential for waste from the Project to reduce available landfill space for residential and business waste disposal	None.	Pressure during Construction and Operations	Integrated Waste Management Plan	- Volume of Project waste disposed of by landfill - Capacity of landfills used by the Project in the monitoring area, through engagement with service providers (where available)	Skeena Resources
	Pressure on education and daycare services and facilities	Potential increased demand for education and daycare services and facilities due to in-migration, resulting in reduced availability of spaces at facilities and potential challenges staffing these facilities to meet increased demand	Disproportionate effect by gender, Indigeneity, and family structure.	Pressure during Operations	- Recruitment and Selection Policy - Procurement Policy - CFP	- Class size and enrolment for: - School District (SD) 87—Stikine - SD 82—Coast Mountains - SD 54—Bulkley Valley - SD 92—Nisga'a - Use of daycare facilities collected through the Annual Employee Survey	BC Data Catalogue
	Pressure on transportation infrastructure	- Potential wear and tear on roads during Construction and Operations due to transportation of personnel, equipment, materials, and other goods to and from the Project site - Minor potential for increased congestion on Highway 37 and roadways in the region, particularly in Terrace and Smithers	None. ²	Pressure during Construction and Operations	- Health and Safety Management System - Mine Emergency Response Plan - Incident Reporting and Incident Investigation Procedure - CFP - Rotational Site Travel Policy	- Traffic counts for the following sites: - Dease Lake: - Dease Lake Junction 47-019NS - Stikine River Bridge 47-026NS - Stewart: - District of Stewart 47-031EW - New Hazelton - New Hazelton 48-015EW - Smithers - West of the town of Smithers 47-025EW - Slack Road 47-003EW - Terrace - Clark Street 48-013EW - Terrace East 48-005EW - Terrace 48-007NS - Terrace West 48-009EW - Kenny Street 48-923EW - Kalum Lake Road 48-003EW - Project traffic volumes (including transportation of workers, materials, equipment, etc.) - Use of the Eskay Creek MAR	BC Ministry of Transportation and Infrastructure Traffic Data Program

Topic	Potential Effect	Relevant Prediction	Gender Based Analysis Plus Considerations	Phase	Mitigations	Indicators	Data Source(s)
Infrastructure and Services (cont'd)	Pressure on availability and affordability of housing	Potential decreased availability and affordability of housing due to in-migration of Project employees and contractors, employees requiring short-term accommodation between rotations, and contractors and drivers requiring short-term accommodations in association with transport and shipping	Disproportionate effect by gender, Indigeneity, geography, and income and employment.	Pressure during Construction and Operations	- Recruitment and Selection Policy - Procurement Policy - CFP	- Housing payment as a percentage of income for Terrace⁵ - Number of resales by housing type for Terrace - Housing related information received through the Annual Employee Survey - Hotel occupancy rate for the Northern BC data reporting region⁶	- Skeena Resources - BC Data Catalogue (BC Housing Affordability Payment as Percent of Income Analysis) - Destination British Columbia
	Pressure on emergency services and law enforcement services	- Potential occasional injuries to employees that require support for offsite emergency transportation during Construction and Operations - Potential increase in Project-related traffic and accidents, putting pressure on emergency services during Construction and Operations - Potential Project-related population change, putting pressure on emergency services during Operations - Potential increased demand for law enforcement services as a result of antisocial behaviours and responding to traffic-related safety issues associated with Project-related vehicle movements	Disproportionate effect by gender, Indigeneity, and geography.	Pressure during Construction and Operations	- Recruitment and Selection Policy - Procurement Policy - Health and Safety Management System - Rotational Site Travel Policy - Mine Emergency Response Plan - CFP	- Number of times Project required the use of emergency services, and type of service - Number of traffic accidents involving Project workers on the job - Royal Canadian Mounted Police detachment crime statistics for Dease Lake, Telegraph Creek, Smithers, Terrace, Stewart, New Hazelton, and Lisims-Nass Valley: - Number of criminal code offences; - Crime rate; - Number of violent offences; and - Violent offence rate.	- Skeena Resources - Statistics Canada

Notes:

BC = British Columbia; CAPEX = capital expenses; CFP = Community Feedback Protocol; Eskay Creek MAR = Eskay Creek Mine Access Road; GDP = Gross Domestic Product; OPEX = operating expenses; Project = Eskay Creek Revitalization Project; RDKS = Regional District of Kitimat-Stikine; SEMP = Socio-Economic Management Plan; Skeena Resources = Skeena Resources Limited or Skeena Gold + Silver

\$ = dollar; % = percent

¹ The effect of population change is a pathway effect for potential changes to the cost of living, as well as all effects associated with the Infrastructure and Services topic, except for pressure on utilities. Potential change in population is also a pathway for the potential effect of changes in community cohesion and/or sense of safety due to in-migration, which is assessed in Chapter 20, Human Health Effects Assessment, of the Revised EAC Application. The Revised EAC Application identified that this effect on community cohesion and/or sense of safety may be felt disproportionately by women, Indigenous people, and those already suffering from mental health concerns (e.g., mood disorders or substance misuse). This disproportionate effect is predicted based on demonstrated patterns of increased sexual violence against women residing near resource extraction projects, the existing increased risk of violence faced by Indigenous women and girls, larger distances to access mental health services in many Indigenous communities, higher rates of mental illness in women and Indigenous populations, and other pre-existing factors and observed trends. While Skeena Resources addresses the potential effect on community cohesion and/or sense of safety (including potential disproportionate effects on diverse groups) through various management and mitigation measures, this effect is not selected for monitoring within the SEMP. This is due to the sensitivities and challenges of collecting data on this topic, particularly for disaggregated population groups such as Indigenous women and girls.

² As assessed in Chapter 21, Infrastructure and Services Effects Assessment, of the Revised EAC Application, the effect of pressure on transportation infrastructure is focussed on the use of transportation infrastructure. However, Chapter 20, Human Health Effects Assessment, also notes that the safety of Indigenous women and girls is a current concern on roadways in and near the Project transportation corridor. Although the Revised EAC Application predicts that Project-related traffic will not significantly increase traffic on Highway 16 or Highway 37 and is not anticipated to affect the safety of Indigenous women and girls, Skeena Resources has multiple mitigation and management measures in place to address this concern. However, the effect of changes in health due to Project traffic (specifically on the safety of Indigenous women and girls) is not monitored within the SEMP due to the sensitivities and challenges of collecting data on this topic.

³ The BC market basket measure does not report at the level of individual communities but does report on aggregated communities by population size. SEMP reporting will present data on all communities in BC with populations under 30,000, and all communities categorized by the market basket measure as rural. This will support a high-level understanding of the cost of living for smaller communities compared to provincial measures such as the Consumer Price Index.

⁴ The SEMP has identified indicators for monitoring pressure on healthcare services and facilities; however, additional indicators related to this effect are monitored through the HMSP.

⁵ “Payment as percent of income” is a measure of housing affordability calculated by BC Stats on a quarterly basis. This measure considers median after-tax income and various indicators of housing cost.

⁶ Note that these data are only available for the current year due to a data-sharing agreement between Destination British Columbia and their data source. The Northern BC Region is the most granular geography in the monitored area with data available. Data are published monthly.

Table 3-2: Mitigation and Enhancement Measures

Measure	Description
Recruitment and Selection Policy	The Recruitment and Selection Policy outlines commitment to: • Monthly, circulate notices of potential job opportunities with the Company and minimum qualifications and experience required to the Indigenous Nations Employment and Contracts Director or their designated representative. • Interview, on a priority basis, applicants who are members of Indigenous Nations that the Company considers, acting reasonably, to meet the minimum job qualifications and experience, or who, with reasonable on-the-job training, could meet such qualifications. • Hire, on a priority basis, those Indigenous Nation Member applicants who meet the minimum job qualifications and experience and other posted job requirements, or, subject to the availability of on-the-job training opportunities, could, with reasonable on-the-job training, meet such qualifications and requirements. • Use commercially reasonable efforts to refrain from hiring any person as an employee of the Company unless and until the foregoing provisions in this section are complied with. • Maximize local and regional hiring by giving preference, after Indigenous Nation Members, to qualified candidates from the local and regional areas, subject to meeting minimum job requirements or being reasonably able to meet them with on-the-job training. • Promote gender equity and diversity in hiring by providing equitable access to job postings, interviews, and selection processes for women, gender-diverse individuals, and other underrepresented groups. This includes the use of gender-sensitive job advertisements, outreach through women's and diversity-focussed employment networks, and unbiased interview and assessment practices. • Develop training programs to enhance the skills and qualifications of the local workforce, including reimbursement for course tuition fees, paid study days, and funding for professional development activities.
Professional Development Policy	The Professional Development Policy guides career advancement at the Project by providing professional development support. This includes reasonable on-the-job training to enable employment of Indigenous applicants who would meet the minimum qualifications and experience with training, but would not meet such qualifications without the training. This also includes on-the-job training focussed on specific technical and leadership skills that promote job advancement. The policy further commits the Company to supporting gender equity and diversity by providing women and other underrepresented groups with equal access to training and advancement opportunities, mentorship and leadership development programs tailored to their needs, and addressing barriers such as flexible scheduling, childcare supports, and culturally safe learning environments.
Gender Equity and Diversity Policy	The Gender Equity and Diversity Policy guides recruitment, workplace practices, advancement opportunities, and workplace flexibility, covering other policies, to support fair and inclusive employment practices. These are: • Inclusive recruitment and access by targeting underrepresented groups and creating entry roles; • Safe and respectful workplaces through zero-tolerance policies on harassment and discrimination (including Workplace Violence Policy, Workplace Bullying and Harassment Policy, and Drug and Alcohol Policy) and gender-sensitive facilities (e.g., washroom and accommodations), with these policies including actions to respond to Call for Justice 13.1 in Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls; • Equal training and advancement opportunities by providing access to apprenticeships, skill development, and leadership pathways for women, Indigenous Peoples, and other diverse groups (also covered under the Professional Development Policy); • Workplace supports and flexibility, including family-friendly policies, childcare assistance, and recognition of cultural obligations; • Mentorship and culture-building through peer networks, supervisor training on unconscious bias, and programs to strengthen diversity awareness; and • Monitoring and accountability by tracking workforce diversity, reporting outcomes, and adjusting measures in collaboration with employees and Indigenous/community partners.

Measure	Description
Hours of Work and Overtime Policy	The Hours of Work and Overtime Policy includes provisions regarding hours worked and overtime for rotational employees working at remote sites.
Annual Work Performance Evaluation Policy	The Annual Work Performance Evaluation Policy implements annual performance evaluations tied to salary reviews to support fair compensation and address wage disparities.
Crew Rotational Travel Policy	The Crew Rotational Travel Policy regulates travel expenses associated with rotations and travel to the communities that serve as transportation hubs to the Project. This includes providing charter air flights for employees that are assigned a regular rotation schedule, compensating for some commercial air travel if necessary to get to a designated pickup point, and compensating for travel to reach a designated pickup point—all based on the most economical option. Rotational employees who move their home residence from their original point of hire are required to pay for additional travel costs associated with their new residence and the transportation hub.
Workplace Violence Policy	The Workplace Violence Policy states that workplace violence at Skeena Resources will not be tolerated on company premises (including vehicles, aircraft, or equipment) while conducting company business, or at company functions or social events.
Workplace Bullying and Harassment Policy	The Workplace Bullying and Harassment Policy communicates the commitment to zero tolerance for workplace bullying and harassment (harassment includes bullying and harassment, sexual harassment, and discrimination). The purpose of this policy is to create and maintain a workplace in which individuals are treated professionally and with dignity and respect, and to establish a process for addressing complaints of harassment, bullying, or discrimination. The policy includes gender-appropriate, gender-specific, and culturally appropriate measures to support diverse workforce needs. This policy applies to all classes of Skeena Resources' workers, including permanent, temporary, volunteer, casual, contract, and student workers. Workers are informed of their rights and responsibilities under this policy through training and awareness.
Drug and Alcohol Policy	The Drug and Alcohol Policy highlights the commitment to operating only dry sites, meaning that no alcohol and no drugs are allowed onsite (except for medically necessary medications). Employees who are dealing with drug or alcohol addiction are provided with appropriate support. The policy is supported by the Drug and Alcohol Testing Standard, Contractor Drug and Alcohol Standard, and the Social and Business Hosting Standard.
Indigenous and Cross-cultural Awareness Training	The Indigenous and Cross-Cultural Awareness Training will be a mandatory training provided to employees and contractors to promote an inclusive and respectful workplace environment that supports recruitment and retention.
Specialized courses and certifications	Skeena Resources will seek to develop and deliver specialized courses and certifications through partnerships with educational institutions and the TCG (e.g., via Tahltan's OnTrack initiative). These courses and certifications will be tailored to the specific needs of the Project to improve workforce capacity and readiness, and to support recruitment and retention.
Mentorship Program, including Tahltan Mentorship Program	The Tahltan Mentorship Program aims to increase Tahltan representation throughout all levels of the company and to provide mentees with the ability, experience, and knowledge to support decision-making regarding the Project, Tahltan Territory, and the Company. The broader mentorship program for all employees builds upon the Tahltan Mentorship Program to support skill development and leadership for the workforce.
Internship Program	The Internship Program aims to support recruitment and retention, with a particular focus on young people who are entering the workforce.

Measure	Description
Apprenticeship Program	The Apprenticeship Program will be structured to maximize training, employment, and long-term career opportunities for Indigenous Nation Members and residents of local and regional communities, focussed on mining-related trades. The program will be: • Established in collaboration with relevant educational institutions, Indigenous and local training organizations, and Skilled Trades BC; • Give priority access to local Indigenous Nation Members, followed by local and regional residents; and • Focus on mining-relevant trades (e.g., heavy equipment operators, miners, technicians, electricians, and welders), and provide on-the-job training in the relevant occupations, under the direct supervision of certified journeypersons.
Social Closure Plan, including Workforce Transition Plan	The Social Closure Plan will consider both the transition of skills and employment opportunities associated with the transition from Operations to Reclamation and Closure, and then to Post-closure, as well as broader skills transition needs. The plan will also identify opportunities to support employees in their individual employment transition and Indigenous communities in their broader socio-economic transition (e.g., loss of employment, procurement).
Regional Collaboration	Skeena Resources will collaborate with regional partners to plan and maximize economic benefits in the region. This will include: • Support workforce planning and readiness by collaborating with regional employment agencies and economic development organizations to help anticipate and prepare for increased demand for Construction and Operations workers. This includes sharing information on Project workforce needs, timing, and skills requirements so that training and employment services can be targeted effectively to local and regional residents. • With regional partners, develop labour market analyses that consider Project and regional employment needs to identify gaps in skills supply and training and recruitment strategies. Where relevant, these analyses may identify specific recommendations on how these gaps can be addressed. • Work with training institutions and Indigenous skills and employment programs to identify how relevant pre-employment training can be delivered locally. • Establish mechanisms, such as job fairs, to connect regional job seekers with direct Project jobs, contractors, and other employers, supporting the prioritization of local and regional candidates in hiring processes.
Procurement Policy	The Procurement Policy includes measures to increase benefits to the local and regional businesses, including, but not limited to: • Working with local and regional businesses, Tahltan, and other Indigenous businesses from Indigenous Nations to enhance the ability of businesses to compete for Project-related contracts—this can include inclusive procurement practices (e.g., priority bidding awarded to local and regional, and Indigenous businesses) to maximize contracting opportunities, achieved through clear and transparent requirements outlined in procurement documentation; • Maintaining frequent communications to inform local and regional, and Indigenous businesses of bidding processes, procurement opportunities, and support systems; • Engaging with local and regional businesses, the TCG, and other Indigenous businesses from Indigenous Nations to understand how to enable their successful participation in procurement processes—this can include collecting feedback from businesses to understand capacity and other barriers to successful participation in bidding; • Conducting virtual business information sessions with local and regional businesses to discuss Project bidding processes and business opportunities to increase participation of local and regional businesses in Project opportunities; and • Conduct annual monitoring of contracts awarded by the Project to understand performance in meeting participation targets.

Measure	Description
Health and Safety Management System	The Health and Safety Management System includes a variety of elements and standards applicable to the potential effects of the Project on healthcare services and facilities. These include Training, Competency, and Hazard Awareness; Emergency Preparedness and Crisis Management; Subcontractor and Suppliers Policy; Vehicle Driving Policy and Standard; and First Aid Procedure. This will also guide a comprehensive training to promote worker safety and best practices across all phases of the Project and can include site-specific orientation, hazard identification, emergency response, best practices, and periodic refresher sessions. Training needs will be evaluated and updated annually to support their effectiveness in reducing workplace risks and fostering a strong safety culture.
Mine Emergency Response Plan	The Mine Emergency Response Plan includes an incident command for medical emergencies during daylight hours and during nighttime hours or when weather conditions prevent helicopter access. It also outlines procedures for emergency air and ground transport decisions and an Emergency Preparedness Inspection Checklist. Additional rules and protocols relevant to pressures on infrastructure and services include protocols for fire response, wildlife encounters, and aviation emergencies.
Health and Medical Services Plan	The Health and Medical Services Plan outlines the onsite medical services and programs available to the Project workforce and describes the measures to coordinate health service delivery with NH. The Health and Medical Services Plan also includes a monitoring component to support understanding of effects on local and regional healthcare services.
Incident Reporting and Incident Investigation Procedure	The Incident Reporting and Incident Investigation Procedure provides instructions for the identification, investigation, and reporting of incidents at the Project, and identifies internal and regulatory reporting timeframes to be met. This procedure applies to all employees and contractors working for and on behalf of Skeena Resources at the Company's locations. The procedures guide the tracking of traffic accidents or incidents and post-event analysis of the incident to identify areas for improvement. This also includes tracking the number of health-related transports to local and regional facilities and a post-event analysis of the incidents.
Employee Assistance Program	The Employee Assistance Program supports employees by promoting occupational health, injury prevention, mental wellness, and other aspects of employee health.
CFP	The CFP provides an avenue for Indigenous Nations, local and regional communities, the public, and employees and contractors to submit comments or concerns about the Project.
Integrated Waste Management Plan	The Integrated Waste Management Plan identifies various waste streams generated from the Project. The plan includes commitments to waste segregation and diversion of recyclable and reusable materials, managing waste throughout the Project lifespan, and disposal locations for different waste types.

Notes:

BC = British Columbia; CFP = Community Feedback Protocol; Company = Skeena Resources Limited; EAO = British Columbia's Environmental Assessment Office; NH = Northern Health; NLG = Nisga'a Lisims Government; Project = Eskay Creek Revitalization Project; TCG = Tahltan Central Government; TSKLH = Tsetsaut Skii km Lax Ha

Collectively, these measures are described in Table 3-2 and will be implemented by the relevant Skeena Resources departments, committees (including those created to support Impact Benefit Agreement implementation), and personnel, including Social Affairs, Community Relations, Strategic Relations, People and Culture, Health and Safety, and Procurement. Most measures listed in Table 3-2, except those specific to the Project Reclamation and Closure phase (e.g., the Social Closure Plan, including the Workforce Transition Plan), will be implemented prior to Project development and operations. Some mitigation measures can be implemented through targeted training programs so that employees understand their rights, roles, responsibilities, and relevant procedures. Implementation may also involve integrating requirements into new employee orientation, embedding them in daily work practices, and providing refresher training. In addition, collaborative programs and regional initiatives can be delivered through working groups, workshops, and annual engagement sessions. Policies, programs, and plans will be

reviewed annually for effective alignment with Project and workforce needs, and best practices. Some mitigation measures are targeted toward certain populations or communities (including the Project workforce), while others do not apply to particular populations or geographic areas. Unless otherwise specified, mitigation measures referring to local and regional populations or communities generally apply to the assessment areas identified in the Revised EAC Application, which includes the monitoring areas identified in Section 2.1, Regional Setting, of this SEMP.

Engagement on the implementation and effectiveness of the mitigations will primarily fall within established avenues for continued engagement with the TCG, Indigenous Nations, local and provincial government, and infrastructure and service providers. These include the Tahlitan Liaison Committee, engagement related to Impact Benefit Agreements, the Joint Occupational Health and Safety Committee, and Project notifications outlined in regulatory requirements, among others. Skeena Resources may implement ad hoc engagements on mitigation and enhancement measures based on requests from the TCG, Indigenous Nations, local and provincial government, and infrastructure and service providers.

Engagement on mitigation can be triggered by the TCG, NLG, TSKLH, Gitanyow Nation, and NH, or by feedback received through the Community Feedback Protocol (CFP) at any time during Project development or operations, or if monitoring reveals that new measures are needed to better reduce or remove adverse effects or enhance beneficial effects.

3.3 Data Sources and Collection

Specific processes and procedures guide how data and information are collected so that monitoring is consistent, clear, and accurate, and that sufficient information is available for the interpretation of results. Most data will come from two primary sources: Project-specific data (from Skeena Resources and onsite contractors) and publicly available sources. Additional information relevant to monitored indicators may also be available through processes and tools, such as the Annual Employee Survey, the CFP, and engagement with local and regional communities (including qualitative perceptions of effects). The following subsections describe these data sources and associated collection methods in more detail.

3.3.1 Publicly Available Data and Information

Publicly available data will be obtained from sources such as Statistics Canada databases and the BC Stats Data Catalogue, and will include datasets such as population estimates, inflation, traffic counts, housing costs, and crime rates. These specific indicators to be monitored are listed in Table 3-1. Data will be collected annually, for the duration of the monitoring period (Section 4.3, Reporting and Record Keeping) and will be assessed for quality, completeness, and relevance before being integrated with Project-specific data. Additional public sources may be used to supplement information on socio-economic outcomes, such as the Census of Population releases (every 5 years), government reports, independent studies, and news articles.

3.3.2 Project-Specific Data and Information

Project-specific data and information will be collected by Skeena Resources and its contractors (where available), covering the relevant monitoring period (Section 4.3, Reporting and Record Keeping). As outlined in Table 3-1, this will include information on Project employment and income, residency status of Project workers, contracting activities, payment of taxes and other statutory obligations, and the use of

onsite medical and emergency services. Project-specific data will be subject to quality checks for accuracy and completeness, conducted by the respective Skeena Resources department prior to reporting. All data will be reported in a manner that protects individual confidentiality and privacy by limiting the level of detail and/or aggregating information. For example, employees may voluntarily provide demographic information (e.g., gender, Indigenous identity) to Skeena Resources' HR department during the onboarding process. This information will be aggregated prior to reporting. Sensitive information will not be reported in cases where individuals can be identified.

3.3.3 Population-Specific Data and Information

The Revised EAC Application predicted that certain population groups (referred to in the Revised EAC Application as diverse subgroups) may be more likely to experience certain adverse effects of the Project and less likely to benefit from the Project. These population subgroups can include women, Indigenous people, youth, seniors, people with disabilities, minorities, and others.

EAC Condition 22 requires that the SEMP guides the collection of voluntarily provided identity factors (such as gender and ethnicity). In line with this requirement, identity factors have been considered in the selection of monitoring indicators identified in Table 3-1. To evaluate how Project benefits and adverse effects are experienced differently by different groups, monitored indicators will, where possible and available, distinguish the outcomes on the diverse population groups (e.g., women and Indigenous people) that were identified in the Revised EAC Application as likely to experience potential disproportionate effects.

Where available, information will be obtained from public sources or voluntarily from Skeena Resources and Project workers through the Annual Employee Survey exit interviews, or employment profiles. Collected data will be disaggregated by gender and ethnicity, where possible, to support inclusive and equitable monitoring. Data collection and reporting will take appropriate measures to protect confidentiality and individual privacy while still enabling the identification of group-specific outcomes. When information cannot be reported confidentially, results will be aggregated or withheld to prevent identification of individuals or small groups.

By monitoring outcomes across different demographics, the Project can more effectively assess whether commitments are being met and respond in an appropriate manner.

3.3.4 Annual Employee Survey

Skeena Resources will conduct an annual survey to collect information on employee demographics, experiences, workplace conditions, compensation and benefits, inclusion and equity, retention and satisfaction, and other topics. The survey will also be used to collect information on topics that may be difficult to obtain from public sources but are important indicators of quality of life. These may include housing status, housing affordability, and perceived cost of living among direct employees residing in the local and regional areas; access to and use of local daycare services; and other relevant socio-economic factors. The information will be used to supplement the existing monitoring indicators and will be incorporated into the data analysis and interpretation of socio-economic monitoring.

Surveys will be conducted anonymously to enable respondents to share honestly about their experiences. Questions will include a mix of closed and open-ended prompts to gather both quantitative and qualitative responses. Skeena Resources will aim to keep the survey questions consistent over time so that results

remain comparable and support reliable monitoring. However, input on the survey from Indigenous Nations, local and regional service providers and communities, and employees may be considered and implemented into survey design.

3.3.5 Community Feedback Protocol

This subsection describes the CFP, which is required by IAAC DS Condition 5.1. Consultation on the process for managing feedback through the CFP will be conducted with Indigenous Nations listed throughout this Plan, in addition to MNBC, to fulfill the federal DS requirement to consult.

The CFP provides an avenue for Indigenous Nation members, the public, employees, and contractors to provide feedback, submit complaints, or ask questions about the Project. In accordance with IAAC DS Condition 5.1, this may include complaints related to noise, light, and dust generation and access changes on the current use of lands and resources for traditional purposes. Depending on the topic, feedback received through the CFP may be referred to and addressed through other processes (e.g., Skeena Resources' Whistleblower Policy or the internal HR complaint process; see Table 3-3).

Communication about the CFP will occur via multiple channels, which may include the Project website, community meetings, engagement sessions, Project orientation, local radio, brochures, and other outreach methods.

Feedback can be submitted through multiple avenues, including phone, e-mail, and directly to certain staff at the Project site, and by mail, as follows:

- **E-mail:** engage.eskay@skeenagold.com
- **Mail:** 1133 Melville St Suite #2600, Vancouver, BC V6E 4E5
- **Phone number:** +1 236-521-5917
- **Staff:** Community members can share feedback in person during community engagement sessions with the Community Relations team, Social Affairs team, and Environment and Regulatory Affairs team. Feedback may also be communicated to Community Relations liaisons at community engagements and onsite Tahltan Environmental Stewards.

Submissions can be made anonymously, although in such cases, Skeena Resources may be unable to follow up or provide a direct response through avenues of contact.

The CFP process functions as described in Table 3-3:

Community feedback may complement the analysis of the indicators listed in Table 3-1 by providing community-specific observations and experiences. Such feedback may be gathered through the CFP or through other engagement avenues, including meetings with Indigenous Nations, local and regional communities, and committees. Relevant feedback will be documented both at its source (e.g., CFP database) and in the applicable SEMP reports.

Table 3-3: Community Feedback Protocol

Step	Target Timeline ¹	Description
1. Acknowledge feedback	Within 48 hours of receipt of feedback	The Social Affairs team will endeavour to acknowledge feedback within 48 hours of receipt where contact information has been provided. This acknowledgement will include an overview of the next steps in the Community Feedback Protocol.
2. Register feedback	Within 5 business days	A member of the Social Affairs team will register the feedback and take appropriate initial actions, including: - Referring the individual to external parties if the feedback is not within the scope of the Project; - Referring the feedback to a different internal resource and/or process. This may include: - The Whistleblower Policy for complaints of fraud, corruption, safety violations, environmental hazards, or other illegal activities; or - The internal complaints process for Skeena Resources' employees (not including contractors) to raise workplace issues through Skeena Resources' People and Culture Department. - Categorizing feedback by type of follow-up required (e.g., acknowledgement only, response to question, address concern raised, etc.); and - Identifying time-sensitive actions.
3. Assess feedback	Within 15 business days	The Social Affairs team will: - Engage the appropriate department and/or manager regarding the feedback, collaborating where applicable to support the process. This may include collaborating on: - Identifying proposed actions to address the feedback; and - Communications with the individual that submitted the feedback.
4. Communicate and implement actions	Within 20 business days	The Social Affairs team will communicate the proposed action(s) to the individual who provided feedback. The Social Affairs team, with relevant departments, will implement actions.
5. Monitor outcomes and follow-up	Within 35 business days (or otherwise agreed-upon timeline)	The Social Affairs team will: - Monitor the implementation of actions, in collaboration with other departments; and - Communicate updates on actions to the individual. Feedback will be considered closed when actions have been implemented unless otherwise agreed upon with the individual.

Notes:

Project = Eskay Creek Revitalization Project; Skeena Resources = Skeena Resources Limited or Skeena Gold + Silver

¹ *Target timelines are intended to be a business standard and not a formal commitment. Timelines could be longer than targeted due to complexity, onsite conditions, or other reasons. Where deviations from the target timeline are expected in advance, they will be communicated to individuals that provide feedback to support a transparent process.*

3.3.6 Data Management

Monitoring data will be compiled and managed by Skeena Resources' Social Affairs team. Skeena Resources' Social Affairs team will work with other departments and contractors to establish timelines and procedures for other parties to provide data on indicators not tracked by the Social Affairs team (e.g., use

of onsite medical facilities). Data from internal and public sources will be stored in a centralized location (e.g., shared folder, Excel file, or Power BI dashboard) that supports analysis of data over time.

All data on Project workers are subject to Skeena Resources' Personal Information Protection Policy, which supports compliance with BC's *Personal Information Protection Act* (2003) and safeguarding privacy, confidentiality, and security in all collection, use, and disclosure practices. Sensitive data related to employees and contractors is stored in UKG and INX software by HR for Project employees and contractors, respectively. Skeena Resources' HR department will apply appropriate privacy measures (e.g., data aggregation, omitting data points) prior to sharing or compiling information to support SEMP reporting.

3.3.7 Caveats and Limitations

The following limitations, caveats, and confidentiality considerations are identified for data sources and collection under the SEMP:

- Quantitative public data may be influenced by confounding factors that are not immediately apparent. For example, a spike in traffic counts or crime can be due to factors unrelated to Project operations.
- Qualitative information, such as community feedback, may reflect perceptions that do not align with quantitative or other potentially conflicting qualitative observations. These perceptions will be carefully considered in data analysis.
- Spatial and temporal coverage of indicators can vary from year to year, limiting the ability to understand changes at the community or regional level.
- Data on disaggregated population groups may not be available or shared due to privacy concerns. However, if data are available but not suitable to report due to confidentiality considerations, it may still be considered in the analysis of effects.
- Indicators are suggested for monitoring and may not be included in every report, depending on availability. However, indicators have been selected with annual availability in mind.
- Indicators will be collected at a frequency that aligns with public data availability and reporting timelines.
- Indicators provided in Table 3-1 may inform the monitoring of more than one effect. For example, indicators related to population change will inform analysis of multiple effects on infrastructure and services.
- Additional data, such as updated census results, ad hoc employee and community surveys, and supplementary context and information from other sources that are not regularly released or updated, may be used to complement the interpretation of results.

3.4 Approach to Monitoring

The approach to annual socio-economic monitoring entails four steps:

1. Understanding the predicted effect;
2. Compiling up-to-date monitoring data and information;
3. Interpreting the monitoring data in relation to the current context, environment, and predicted effect; and
4. Evaluating the effectiveness of mitigation measures based on the interpretation of monitoring results.

These steps are described in more detail below, and their outcomes will be compiled in a structured internal annual monitoring report.

Effect Prediction

Table 3-1 in this Plan outlines the predicted effects of the Project relevant to socio-economic monitoring and the specific predictions for each effect, such as the number of jobs expected at the Project during different phases. These predictions will be summarized for each effect to provide a clear basis for comparison with monitoring results and to support the assessment of whether observed outcomes align with expectations.

Data

Guided by indicators outlined in Table 3-1, the data section of the annual monitoring report will present both historical and the most recent data and information for each effect. Data sources will be clearly identified, with commentary on quality, reliability, or the potential variation in coverage or frequency. Where relevant, data will be disaggregated by gender and ethnicity to highlight patterns and/or disproportionate effects. Gaps, limitations, or use of proxy indicators will be documented, along with contextual factors that may influence results. Tables, graphs, or charts may be used to visually display quantitative data to make trends easier to understand.

Interpretation

The interpretation of results will consider the data and information collected for each effect, including relevant community feedback received through communication channels and findings from the Annual Employee Survey. Supplementary data, as it becomes available (e.g., census data, qualitative perceptions of effects), will be used to provide additional insights. The analysis will focus on identifying potential or likely links between Project activities and observed interactions with the socio-economic environment, with careful distinction between correlation and causation and relevant uncertainties clearly documented. The objective of this section of the annual monitoring report will be to determine whether the collected evidence supports the stated prediction, refutes it, or is insufficient to reach a conclusion.

Effectiveness Evaluation

Skeena Resources will evaluate the effectiveness of mitigation measures by comparing monitoring results to effects predicted in the Revised EAC Application (Table 3-1, column “Predicted Effects”), including beneficial effects such as increased employment. Where monitoring results do not align with either predicted effects or expected natural variations in socio-economic indicators, Skeena Resources will identify adaptive management actions to mitigate these unanticipated changes (see Section 4.3, Adaptive Management, and 5, Plan Revision).

Baseline conditions and associated anticipated trends are summarized in Section 2.1.2, Existing Conditions, and further described in appendices to the Revised EAC Application, including Appendix 20-3, Diverse Subgroups Existing Conditions Supplement, Appendix 21-1, Regional Socio-economic Baseline Report, Appendix 21-2, Tahltan Socio-economic Baseline Report, and Appendix 21-4 Socio-economic Baseline Addendum Report.

4.0 PLAN IMPLEMENTATION

4.1 Roles and Responsibilities

The SEMP was prepared by, and will be implemented by, Qualified Persons with a minimum of 5 years' experience in the planning of socio-economic programs for natural resource development projects.

Skeena Resources has the obligation of meeting commitments and of making relevant obligations known to mine personnel and site contractors. A clear understanding of the roles, responsibilities, and level of authority that employees and contractors have when working at the site is essential to meet Environmental Management System (EMS) and social and cultural management objectives.

This section provides an overview of general management responsibilities to support the site activities for key persons involved in SEMP management.

Skeena Resources has the obligation of meeting commitments and communicating relevant obligations to direct employees and Project contractors during all phases of the Project. Table 4-1 provides an overview of roles and responsibilities relevant to this Plan.

Table 4-1: Eskay Creek Mine Environmental Management Roles and Responsibilities for Key Positions

Skeena Resources	
Mine Manager	• Ultimately responsible for the Project under the <i>Mines Act</i> (1996) and <i>Health, Safety and Reclamation Code for Mines in British Columbia</i> (EMLI 2024), including oversight of socio-economic effects management and monitoring. • Allocates adequate resources and personnel to support implementation of socio-economic management and mitigation measures. • Oversees the review and continuous improvement of the SEMP, delegating roles and responsibilities as needed.
Social Affairs Manager	• Responsible for overseeing SEMP management measures and mitigations with support from other relevant departments. • Oversees implementation of the monitoring framework described in Section 3, Socio-Economic Monitoring and Management, including the following: ○ Collects and compiles data for the indicators identified in Table 3-1, either directly or from other departments. ○ Collaborates and consults with relevant parties on management and monitoring efforts. ○ Produces the annual Socio-economic Monitoring Report according to the timeline described in Section 4.3, Reporting and Record Keeping. ○ Conducts an effectiveness evaluation of mitigation measures as described in Section 3.4, Approach to Monitoring, and oversees subsequent adaptive management as described in Section 4.4, Adaptive Management. • Integrates SEMP policies and procedures into departmental work plans and coordinates with other departments to deliver relevant mitigations, such as the CFP.
HR Manager	• Collects and compiles relevant data on HR indicators identified in Table 3-1, such as the number of Project workers by community of residence. • Integrates SEMP policies and procedures into departmental work plans and coordinates with other departments to deliver relevant mitigations, such as the Workplace Bullying and Harassment Policy.

Skeena Resources	
Health and Safety Manager	- Responsible for Health and Safety for the Eskay Creek Mine. - Collects and compiles relevant data on health and safety indicators identified in Table 3-1, such as the number of times the Project required the use of emergency services and the type of service. - Integrates SEMP policies and procedures into departmental work plans and coordinate with other departments to deliver relevant mitigations, such as the Mine Emergency Response Plan.
Procurement Manager	- Collects and compiles relevant data on procurement indicators identified in Table 3-1, such as total procurement contract spend. - Integrates SEMP policies and procedures into departmental work plans and coordinate with other departments to deliver relevant mitigations, such as the Procurement Policy.
Contractor Personnel	- Understand environmental and socio-economic policies, processes, and responsibilities according to their job tasks. - Undergo onboarding to become aware of pertinent environmental and socio-economic protection measures.

Notes:

EMLI = Ministry of Energy, Mines and Low Carbon Innovation; HR = Human Resources; Project = Eskay Creek Revitalization Project; SEMP = Socio-Economic Management Plan

4.2 Reporting and Record Keeping

Monitoring for the SEMP will occur annually throughout Construction and Operations and will follow the process outlined in Section 3, Socio-economic Monitoring and Management. A report on the results of employment monitoring under the SEMP¹⁴ will be produced annually during Project Construction and during the first 5 years of Operations (per EAC Condition 22.3e). This reporting cadence may be adjusted based on the results of the monitoring process, feedback received through the CFP, or engagement with the EAO, Indigenous Nations, and local and regional communities. SEMP reports will be submitted to the EAO and Indigenous Nations, and local and regional service providers and local and regional communities who express interest in receiving reports.

The annual Socio-Economic Monitoring Report will present the results of monitoring activities and the evaluation of mitigation effectiveness over the reporting period. Following the content outlined in Section 3.4 of this Plan, the annual monitoring report will include:

- Introductory content such as Project overview, regulatory compliance and purpose of the report.
- Methods and data sources to outline the approach to monitoring.
- Results section that will identify (i) predictions for each indicator; (ii) results for the indicators identified in Table 3-1; (iii) interpretation of monitoring data, including comparison to predicted conditions; and (iv) an evaluation of mitigation and enhancement measure effectiveness based on monitoring results.
- A summary of any adaptive management actions undertaken or identified, including rationale and status.
- Engagement activities undertaken to support the interpretation of results, identify emerging issues or verify the effectiveness of mitigation.

¹⁴ This will include the following indicators, per EAC Condition 22.3e: the number of people working on the Project (direct and contracted); a profile of the workforce according to voluntarily provided identity factors, such as gender and ethnicity; and aggregate statistics on the home locations of workers.

In addition to annual reporting, Skeena Resources will maintain detailed records of consultation and engagement activities related to the SEMP. This will include documentation of meetings, feedback received, responses provided, and adjustments made to the monitoring framework (as part of the Plan revision process described in Section 5, Plan Revision) as a result of engagement with the EAO, Indigenous Nations, and other local and regional communities. These records will provide a transparent account of how input has informed the development of the SEMP and the annual monitoring process. Maintaining a clear record of consultation and engagement will also support accountability, facilitate future reviews of the SEMP, and facilitate inclusion of the perspectives of Indigenous and community partners in both the monitoring results and their interpretation.

4.3 Adaptive Management

This SEMP is a living document, which will support adaptive management of potential socio-economic effects. Per guidance from the EAO on the development and use of adaptive management plans, adaptive management occurs in a cycle. The six stages of this cycle are assess, design, implement, monitor, evaluate, and adjust, which are further described in Table 4-2. These stages enable Skeena Resources to assess the effectiveness of the mitigation measures through monitoring and subsequently adjust these measures in response to observed effects. Skeena Resources' adaptive management process is outlined in Table 4-2, which describes the six adaptive management stages and how Skeena Resources will implement these in the context of the SEMP.

Table 4-2: Adaptive Management Process for the Socio-Economic Management Plan

Adaptive Management Stage	Description	Skeena Resources' Role
Assess	Define the management problem and identify measurable objectives and key uncertainties.	Skeena Resources has defined the management problem in the Revised EAC Application (Chapter 21, Infrastructure and Services Effects Assessment, and Chapter 24, Employment and Economy Effects Assessment). In these chapters, Skeena Resources has identified potential for changes in economic conditions, such as employment and income, Project expenditures, business opportunities, GDP benefits, tax revenue, and cost of living. Skeena Resources also identified pressures on various infrastructure and services as a result of population increases and Project activities, including healthcare services and facilities, waste management utilities, education and daycare services and facilities, transportation infrastructure, availability and affordability of housing, and emergency services and law enforcement services. These potential changes are linked to measurable indicators presented in Table 3-1, which provide the basis for subsequent monitoring and effectiveness evaluation. Skeena Resources is responsible for identifying measurable objectives in collaboration with the TCG and in consultation with NLG, TSKLH, Gitanyow Nation, and NH. These objectives have been identified in Section 1.2, Purpose and Objectives, of this Plan. Skeena Resources has identified key uncertainties in the Revised EAC Application through reporting the confidence of effects predictions. Notably, most predictions for Employment and Economy effects were characterized as high confidence, while Infrastructure and Services predictions were medium. However, confidence in the predictions of effects on diverse populations was often lower. Additional uncertainties and limitations regarding monitoring data collection are presented in Section 3.3, Data Sources and Collection, of this Plan.

Adaptive Management Stage	Description	Skeena Resources' Role
Design	Design plan(s) to achieve objectives, evaluate outcomes, reduce key uncertainties, and assess results compared to predicted outcomes.	Skeena Resources' role in this stage is to design the SEMP in collaboration with the TCG and in consultation with NLG, TSKLH, Gitanyow Nation, and NH. Skeena Resources has developed this SEMP to manage and monitor the potential effects identified in Chapter 21, Infrastructure and Services Effects Assessment, and Chapter 24, Employment and Economy Effects Assessment. This SEMP helps to manage identified adverse effects, evaluate outcomes, reduce key uncertainties, and assess results compared to predicted outcomes. The design includes the selection of indicators (Table 3-1), which function as metrics for evaluating Project effects and mitigation effectiveness through comparison of monitoring results to predicted conditions.
Implement	Implement management actions, document implementation, and identify deviations from plans.	Section 3.2, Mitigation and Enhancement Measures, and Section 4.1, Roles and Responsibilities, of this SEMP describe the mitigation and management actions to address potential effects and roles and responsibilities in the implementation of these actions. Mitigation measures are implemented prior to and throughout each Project phase, providing the basis for subsequent evaluation of effectiveness through annual monitoring results.
Monitor	Undertake monitoring to verify that implementation followed plans and to evaluate the effectiveness of plans. Assess changes and improvements to outcomes.	Section 3, Socio-Economic Monitoring and Management, of this SEMP describes the monitoring that Skeena Resources will undertake to verify that implementation followed plans and evaluate the effectiveness of management and mitigation efforts. Monitoring is conducted using the indicators outlined in Table 3-1 and is undertaken on a defined schedule (annual), generating the data required for effectiveness evaluation.
Evaluate	Assess monitoring results against predictions, investigate unexpected outcomes, and identify learnings that will reduce uncertainty in management practices.	Section 3.4, Approach to Monitoring, of this SEMP describes how Skeena Resources will assess monitoring results against predictions (see Section 3.4, Approach to Monitoring), investigate unexpected outcomes, and identify learnings that will reduce uncertainty in management practices. Skeena Resources will analyze data collected for monitored indicators, as well as available supplementary data, to identify potential or likely links between Project activities and observed interactions with the socio-economic environment. The evaluation process will include: (1) interpretation of monitoring results; (2) comparison to predicted conditions and effects; (3) identification of potential deviations or unexpected outcomes; and (4) determination of whether adaptive management actions are required. Where actions are required, Skeena Resources will identify appropriate mitigation adjustments, assign responsibilities, and establish implementation timelines. Mitigation effectiveness will be evaluated on an annual basis, aligned with the SEMP monitoring and reporting cycle. Monitoring indicators (Table 3-1) will be collected and reviewed annually, and in some cases more frequently, where data availability allows, to support ongoing internal review of mitigation performance. If monitoring results indicate a potential (unanticipated) adverse effect, and where that effect is reasonably attributable to Project activities, Skeena Resources will assess the need for corrective or adaptive management measures on a case-by-case basis. The Social Affairs Manager will determine whether an observed effect is reasonably attributable to Project activities, and may solicit input from appropriately Qualified Persons responsible for the SEMP at their discretion. This determination will consider monitoring results,

Adaptive Management Stage	Description	Skeena Resources' Role
		relevant Project activities, temporal and geographic relationships to the effect, community feedback, and other available information. The evaluation process and any resulting adaptive management decisions will be documented through internal reporting processes. This will include identification of issues, rationale for selected actions, assigned responsibilities, implementation timelines, and tracking through to completion. Adaptive management responses may include, but are not limited to, refinement of mitigation and enhancement measures, updates to monitoring indicators or data sources, adjustments to implementation approaches, or enhanced engagement with TCG, Indigenous Nations, regulators, and service providers.
Adjust	Based on lessons learned, modify established management practices/plans to better achieve objectives. Refine monitoring to improve future evaluations.	Skeena Resources will use monitoring data, interpretation, and effectiveness evaluation findings to update the SEMP during scheduled reviews (see Section 5, Plan Revision) or after annual monitoring is completed in response to observed monitoring results or input received through engagement or collaboration with regulators, TCG, Indigenous Nations, and local and regional communities. Skeena Resources will undertake a collaborative review process with the TCG for material updates to the SEMP. This collaborative process will include defined roles for Skeena Resources and TCG, and will be implemented alongside broader engagement with regulators, Indigenous Nations, and local and regional communities. The annual engagement and collaboration process with TCG will include: 1. notification to TCG or consulted parties of the need for updates; 2. sharing of draft revisions to TCG for review and input within agreed upon timelines; 3. collaborative discussions with TCG (e.g., meetings or workshops) to review proposed changes, identify concerns, and confirm areas of alignment; 4. incorporation of TCG input into revisions, including documentation of how input was considered; and 5. finalization of updates and communications of outcomes to all participants. Updates may include revisions to mitigation and enhancement measures and/or the monitoring framework (including indicators, reporting frequency, etc.). All updates and the rationale for changes will be documented through internal reporting and reflected in subsequent versions of the SEMP, maintaining transparency and traceability in how monitoring results, engagement and collaboration inform adaptive management. Adjustments will be informed by the annual evaluation of effectiveness and through ongoing engagement and collaboration with TCG and other parties, so that monitoring results directly inform adaptive management decisions.

Source: ENV (2022)

Notes:

ENV = Ministry of Environment and Climate Change Strategy; NH = Northern Health; NLG = Nisga'a Lisims Government; Plan = Socio-Economic Management Plan; Project = Eskay Creek Revitalization Project; Revised EAC Application = Application for an Environmental Assessment Certificate / Impact Statement; SEMP = Socio-Economic Management Plan; Skeena Resources = Skeena Resources Limited or Skeena Gold + Silver; TCG = Tahltan Central Government; TSKLH = Tsetsaut Skii km Lax Ha

Adaptive management described in this section will be implemented if monitoring indicates that Project effects are different than those predicted in the EAC Application or that effects are not being mitigated to the extent contemplated in the EAC Application.

4.3.1 Employment Thresholds

As outlined in Section 3.2, Skeena Resources has identified several measures to maximize Indigenous and local hiring. Condition 22.3(f) requires Skeena Resources to develop thresholds for further mitigations based on the results of annual employment reporting in consultation with TCG, NLG, TSKLH, Gitanyow Nation, local governments, and provincial government agencies. Employment at the Project is monitored through the indicators identified in Table 3-1 and reported annually. Engagement on employment thresholds will be undertaken as part of the annual monitoring and reporting cycle, and on an as-needed basis where potential deviations are identified.

The Social Affairs Manager will determine if a deviation is substantial and prolonged, and may solicit input from appropriately Qualified Persons at their discretion. The determination will be informed by annual monitoring results, considering:

- magnitude of deviation from predicted employment outcomes;
- persistence of the deviation across reporting periods;
- whether the deviation is reasonably attributable to Project activities;
- labour market conditions and other external factors; and
- input from Indigenous Nations, governments, and agencies during engagement on employment results.

Where monitoring results indicate a potential substantial and prolonged adverse deviation from expected employment levels, Skeena Resources will initiate an engagement process with TCG, NLG, TSKLH, Gitanyow Nation, local governments, and/or provincial government agencies to review and interpret the results. This engagement will include:

- Presentation and validation of monitoring data, including indicators in Table 3-1 and relevant contextual information (e.g., job postings, applicant availability, hiring outcomes).
- Discussion of contributing factors, including labour market conditions, training participation, contractor performance, and other external or structural influences.
- Consideration of whether the deviation is attributable to Project-related factors and within Skeena Resources' control or influence.
- Identification of whether additional or adjusted mitigation measures are warranted, recognizing that responses may differ by community or group depending on needs and priorities.

Where it is agreed that the threshold has been triggered, Skeena Resources will work with participating parties to identify appropriate responsive measures, which may include enhanced recruitment and outreach, expanded training and capacity-building initiatives, or adjustments to contractor requirements.

Engagement outcomes will be documented and incorporated into subsequent reporting and SEMP updates, maintaining transparency and traceability in how monitoring results inform adaptive management.

5.0 PLAN REVISION

Skeena Resources reviews this Plan annually throughout Construction and the first 5 years of Operations, as well as on an as-needed basis. This may include review and/or revision in response to:

- Adaptive management in response to effects observed through monitoring; and
- Engagement with regulators, Indigenous Nations, or local and regional communities.

If any Plan revisions result from review, they will be submitted to regulators and consulted parties in accordance with EAC Conditions 1 to 4 pertaining to document review, updates, development, and consultation on SEMP development and updates.

EAO may require changes if they determine the SEMP is not:

1. Meeting one or more objectives set out in Condition 22 or the purpose and objectives set out in Section 1 of the SEMP;
2. Having the effects, set out in the SEMP, that are contemplated or intended; or
3. Consistent or remaining aligned with industry best practices or technology.

Plan revisions will be made in collaboration with the TCG and in consultation with the NLG, TSKLH, Gitanyow Nation, and NH. This collaboration and consultation will focus on material changes. Material changes are defined as those that may impact which mitigation is being implemented for the Project, or how any mitigation is being implemented effectively. After collaboration and consultation, a new version of the SEMP will be provided to EAO, TCG and consulted parties.

Non-material changes will be made in the Plan without collaboration or consultation. However, the revised Plan will be distributed to the NLG, TSKLH, Gitanyow Nation, and NH when the SEMP is resubmitted to TCG and EAO. Non-material changes include, but are not limited to, spelling and grammatical revisions, and clarifications to reduce uncertainty or remove ambiguity.

6.0 AUTHORSHIP/SUBMISSION RECORD

This SEMP was prepared by Qualified Persons in collaboration with the TCG and in consultation with the NLG, TSKLH, Gitanyow Nation, and NH. A Qualified Person is also required to prepare revisions or amendments to the SEMP. Information on the Qualified Persons is provided below. The submission of Version 0.1 and major changes to Version 0.1 and subsequent versions of the SEMP will be documented in Table 6-1.

Table 6-1: Socio-Economic Management Plan Preparation

Date	Revision Number	Reason for Revision	Change Summary	Qualified Person(s)	Regulatory Agencies Submitted to
December 2025	Version 0.1	Submitted for collaboration with the TCG and consultation with the NLG, TSKLH, Gitanyow Nation, and NH	N/A	Klaudia Sieminska, MA Zoë Mullard, MASc	N/A
January 2026	Version 1.0	Submitted to EAO in fulfillment of Condition 22 of EAC #M26-01	N/A	Klaudia Sieminska, MA Zoë Mullard, MASc	EAO
May 2026	Version 2.0	Revised version submitted to EAO in response to EAO and TCG comments	Revisions include clarifying non-specific wording, outlining what will be included in the annual monitoring reports, clarifying the adaptive management process, and describing collaboration and engagement related to employment thresholds.	Klaudia Sieminska, MA Nathan Braun, MA	EAO and TCG
August 2026	Version 3.0	Revised version submitted to EAO in response to EAO comments	Revisions include clarifying non-specific wording, clarifying the adaptive management process, and describing collaboration and engagement related to employment thresholds.	Zoe Mullard, MASc Nathan Braun, MA	EAO and TCG

Notes:

N/A = not applicable; NH = Northern Health; NLG = Nisga'a Lisims Government; TCG = Tahltan Central Government; TSKLH = Tsetsaut Skii km Lax Ha

This management plan has been prepared and reviewed by the following Qualified Persons:

Prepared by:


 Zoe Mullard, MASc

Reviewed by:


 Nathan Braun, MA

7.0 REFERENCES

Legislation and Regulations

Declaration on the Rights of Indigenous Peoples Act, SBC 2019, c 44.

Employment Standards Act, RSBC 1996, c 113.

Environmental Assessment Act, SBC 2018, c 51.

Mines Act, RSBC 1996, c 293.

Personal Information Protection Act, SBC 2003, c 63.

United Nations Declaration on the Rights of Indigenous Peoples Act, SC 2021, c 14.

Other Sources

BC Gov News. 2024. "New Hospital in Terrace Open for Patients". *BC Gov News*. 27 November 2024. <https://news.gov.bc.ca/releases/2024HLTH0156-001603> (accessed October 2025).

Declaration Act Consent Decision-Making Agreement for Eskay Creek Project. 2022. Between the Province of British Columbia and Tahltan Central Government. Conclusion date: 6 June 2022. https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/consulting-with-first-nations/agreements/declaration_act_consent_decision-making_agreement_for_eskay_creek_project.pdf (accessed April 2024).

EMLI (Ministry of Energy, Mines and Low Carbon Innovation). 2024. *Health, Safety and Reclamation Code for Mines in British Columbia*. Revised April 2024. Victoria, BC. https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/mineral-exploration-mining/documents/health-and-safety/code-review/minescode_april_2024_web.pdf (accessed September 2025).

ENV (Ministry of Environment and Climate Change Strategy). 2022. *Development and use of Adaptive Management Plans, Version 3.0*. https://www2.gov.bc.ca/assets/gov/environment/waste-management/industrial-waste/industrial-waste/mining-smelt-energy/guidance-documents/tg20_guide_to_preparing_adaptive_management_plans.pdf (accessed August 2025).

Higgins, H.C. 1982. "The Tahltan Feast for the Dead: A Symbolic Examination of Space." PhD dissertation, University of New Mexico.

National Inquiry into Missing and Murdered Indigenous Women and Girls. 2019. *Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls*. <https://www.mmiwg-ffada.ca/final-report/> (accessed November 2025).

Skeena Resources (Skeena Resources Limited). 2025a. *Revised Eskay Creek Revitalization Project, Application for an Environmental Assessment Certificate / Impact Statement*. Prepared by Tahltan ERM. April 2025.

- Skeena Resources. 2025b. "Chapter 24: Employment and Economy Effects Assessment." In *Revised Eskay Creek Revitalization Project, Application for an Environmental Assessment Certificate / Impact Statement*. Prepared by Tahltan ERM. April 2025.
https://projects.eao.gov.bc.ca/api/public/document/6838c97e2b76e1002140525c/download/24_Employment_and_Economy-Revised_EAC_Application.pdf (accessed August 2025).
- Skeena Resources. 2025c. "Chapter 21: Infrastructure and Services Effects Assessment." In *Revised Eskay Creek Revitalization Project, Application for an Environmental Assessment Certificate / Impact Statement*. Prepared by Tahltan ERM. April 2025.
https://projects.eao.gov.bc.ca/api/public/document/6838c9712b76e10021405247/download/21_Infrastructure_and_Services-Revised_EAC_Application.pdf (accessed August 2025).
- Statistics Canada. 2023. *Census Profile, 2021 Census of Population*.
<https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/index.cfm?Lang=E>
(accessed September 2025).
- Tahltan Central Council and Government of BC (Government of British Columbia). 2015. *Klappan Strategic Initiative*. Report on file with British Columbia.
- Tahltan Tribal Council. 1987. Tahltan Tribal Council Resource Development Policy Statement.
- Tahltan Tribe. 1910. *Declaration of the Tahltan Tribe*.
<https://www.tndc.ca/wp-content/uploads/2025/06/Tahltan-Declaration.pdf> (accessed November 2025).
- United Nations. 2007. *United Nations Declaration on the Rights of Indigenous Peoples*.
https://www.un.org/development/desa/Indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf (accessed November 2025).

APPENDIX A TABLE OF CONCORDANCE

Appendix A: Table of Concordance

Environmental Assessment Certificate #M26-01 and Project DS

The EAO issued EAC #M26-01 to authorize Skeena Resources to construct and operate the Project. The EAC contains a number of Conditions, of which Condition 22 requires the development of this SEMP. In addition, Condition 3 contains requirements that pertain to all management plans developed for the EAC. The Project's Federal DS Condition 5.1 requires the development of a protocol for receiving and addressing complaints related to the effects of Designated Project activities, including complaints related to noise, light and dust generation and access changes on the current use of lands and resources for traditional purposes. Table A-1 provides a table of concordance to the EAC and DS requirements for this SEMP.

Table A-1: Environmental Assessment Certificate Concordance Table

Condition Requirement	Location
EAC Conditions	
Condition 3	
3.1 The requirements within this condition apply to all plans or programs (including any updates) required in this Certificate.	Applies to this document under Condition 22
3.2 The Holder must ensure that each document includes the following information:	Section 1.2
a. Purpose and objectives of the document;	
b. Roles and responsibilities of the Holder, Project personnel and any contractors employed for the purposes of implementing the document;	Section 4.1
c. Names and, if applicable, professional certifications and professional stamps, of those responsible for the preparation of the document;	Section 6
d. Schedule for implementing the actions in the document throughout the relevant project phases;	Section 4.2
e. How the effectiveness of any mitigation measures will be evaluated including the schedule for evaluating effectiveness;	Section 3.2 Section 3.4 Table 3-1
f. How the Holder will implement adaptive management to address effects of the Project if the monitoring conducted under subsection 3.3 shows that those effects:	Section 4.3 Table 4-2
i. Are not being mitigated to the extent contemplated in the Application; or	
ii. Are different than those predicted in the Application;	
g. Schedules and methods for the submission of reporting required under the applicable condition, and the form and content of those reports;	Section 4.2
h. Process and timing for updating the document, including any consultation with parties listed in the condition that would occur in connection with such updates; and	Section 5
i. Process and timing for updating the document, including a description of any Collaboration undertaken with TCG, as described under Condition 5.	Section 4.3 Table 4-2 Section 5
3.3 The Holder must ensure that if a document includes monitoring requirements, the document includes:	Monitoring not required in Condition 22.
a. A description of baseline information that will be used to support monitoring of the effectiveness of mitigation;	
b. The methods, location, frequency, timing, duration and, where required, the calibration and/or auditing requirements of monitoring; and	
c. The scope, content and frequency of reporting of the monitoring results.	

Condition Requirement	Location
Condition 3 (cont'd)	
3.4 If a party is succeeded by another entity or if the responsibilities of a government agency change, the Holder must consult with the new entity or new responsible government agency.	Acknowledged
Condition 22	
22.1 The Holder must retain a Qualified Person(s) with a minimum of five years' experience in the planning of socioeconomic programs for natural resource development projects, unless otherwise authorized by the EAO, to develop a plan to manage potential direct socioeconomic effects. The plan must be developed in Collaboration with TCG and in consultation with NLG, TSKLH, Gitanyow and Northern Health.	Document has been developed by Klaudia Sieminska, MA, and Nathan Braun, MA Section 1.5
22.2 Following development of the plan, the Holder must provide the plan to the EAO for review a minimum of 30 days prior to the planned commencement of Construction, unless otherwise authorized by the EAO.	Submitted in Version 1.0
22.3 The Holder must ensure that the plan includes at least the following: a. How the mitigation measures described in Table 5-1 in Appendix A-01 of the Application listed under Section 24 (Employment and Economy) will be implemented;	Section 3.2 Table 3-2
b. Hiring and training measures, which must be informed by consultation with TCG, NLG, TSKLH, Gitanyow and Northern Health, that include: i. Prioritizing regional hiring and procurement; ii. Providing on the job training and apprenticeship; iii Training to promote worker safety and best practices in safety; iv. Working with regional employment agencies and economic development organizations to assist in planning for increased demand for Construction and Operations workers; v. Ensuring the Holder and its contractors will adopt and implement policies and practices for providing opportunities to regional businesses and contractors; and vi. Considering gender equity and diversity employment measures and practices.	Section 1.5 Section 3.2
c. The means by which the Holder will consult with TCG, NLG, TSKLH, Gitanyow, and Northern Health regarding Project activities and actions related to the implementation of mitigation measures for socioeconomic effects;	Section 1.5 Section 3.2
d. The means by which the Holder will develop and implement the following: i. Measures to promote safe, respectful and inclusive conduct in the workplace and community, including actions to respond to Call for Justice 13.1 in Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls; ii An anti-violence and anti-harassment policy, incorporating gender-appropriate, gender-specific, and culturally appropriate policies and processes; and iii Mandatory cross-cultural awareness training for employees and contractors.	Section 3.2
e. Annual employment reporting during Construction and the first five years of Operations. These reports will include information pertaining to the Project labour force, subject to voluntary disclosure and limitations regarding personal confidentiality, specifically: i. The number of people working on the Project (direct and contracted); ii. A profile of the workforce according to voluntarily provided identity factors, such as gender and ethnicity; and iii Aggregate statistics on the home locations of workers.	Section 4.2

Condition Requirement	Location
Condition 22 (cont'd)	
f. Identification of thresholds to implement further mitigation measures, based on the results of annual employment reporting, developed in consultation with TCG, NLG, TSKLH, Gitanyow, local governments and provincial government agencies.	Table 3-1 Section 3.4 Section 4.3 Section 4.3.1
22.4 The Holder must implement the plan and any updates made pursuant to subsection 2.2 or paragraph 3.2(h) throughout Construction and Operations, under the direction of a Qualified Person retained by the Holder, and to the satisfaction of the EAO.	Acknowledged
DS Conditions	
5.1 The Proponent shall develop, prior to construction and in consultation with Indigenous groups, and implement during all phases of the Designated Project, a protocol for receiving and addressing complaints related to the effects of Designated Project activities, including complaints related to noise, light and dust generation and access changes on the current use of lands and resources for traditional purposes. The Proponent shall provide the protocol to the Agency and Indigenous groups prior to construction and make the protocol publicly available online. As part of the protocol the Proponent shall:	Section 3.3
5.1.1 document and respond to complaint(s) in a timely manner and demonstrate how issues have been addressed, including through the implementation of modified or additional measures; and	Section 3.3
5.1.2 acknowledge receipt of any complaints within 48 hours.	Section 3.3