

FOLLOW-UP TABLE OF COMMITMENTS

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REVISION CONTROL

Since the submission of the Environmental Impact Assessment (EIA) in 2021, some mitigation measures have been amended to address questions or comments from provincial authorities. The measures set out in the table below are the most up-to-date measures to which Galaxy Lithium (Canada) Inc. (hereinafter referred to as Galaxy) is committed. This table was prepared to address condition No. 3 of the certificate of authorization issued on December 27, 2023.

Table 1 **Follow-up of Commitments**

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
Exploitation								
ENG-1	<p>The extraction rates are as follows:</p> <ul style="list-style-type: none"> - Average daily ore extraction rate: 5,500 tonnes; - Maximum daily ore extraction rate: 8,500 tonnes; - Average daily total mining rate (ore and waste rock): 30,000 tonnes; - Maximum daily total extraction rate (ore and waste rock): 35,000 tonnes. <p>The mine life is estimated at 18.5 years.</p>			X		<p>Demande d'engagements (COMEX, juin 2023)</p>	<p>N/A – planned in the operation phase.</p>	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
Filing of document with the Provincial Administrator								
ENG-7	Submit the Emergency Management Plan (EMP) to the Administrator, for information, when filing the first application for ministerial authorization under Section 22 of the Environment Quality Act for the construction of the mine site.	X				Demande d'engagements (COMEX, juin 2023)	Completed – The EMP was submitted on December 23, 2023.	
ENG-8	Submit the infrastructure monitoring program for the mining operation phase no later than when filing the application for authorization under Section 22 of the EQA for the operation of the mine site.		X			Demande d'engagements (COMEX, juin 2023)	N/A – planned in Q1-Q2 2026.	
General								
GEN-01	In the event of any temporary suspension of mining activities, notify government authorities in writing of the anticipated dates of cessation and resumption of mining activities and implement the necessary measures stipulated in the regulations.			X		ÉIE (2021)	N/A - planned in the operation phase.	Added commitment

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
GEN-02	During the construction phase, environmental clauses must be respected by contractors, failing which they will have to bear the costs of rectifying the situation.	X	X			ÉIE (2021)	Ongoing - environmental clauses are included in the environmental program, which is part of the contractual document sent to all contractors.	Added commitment
GEN-03	Implement and apply an ISO-14001:2015 management system for subsequent certification to ensure the implementation of the highest environmental standards for its products, services and processes. The complete system will be developed and implemented for the operation phase. During the construction phase, environmental management rules will be integrated into the Project Execution Plan (PEP).	X	X	X		ÉIE (2021)	Ongoing - the PEP is currently being implemented.	Added commitment

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
Soil Profile and Surface								
SUR 01	Mark out the boundaries of the planned earthworks, restrict the areas of deforestation and soil stripping as well as cutting areas to the footprint of the required infrastructure (road, pits, stockpiles, basin, etc.).	X	X		X	ÉIE (2021)	Ongoing	
SUR 02	Mark out access, paths and work areas before undertaking work, and prohibit parking and movement of machinery and vehicles outside of those areas.	X	X		X	ÉIE (2021)	Ongoing	
SUR 03	Rehabilitate creek banks disturbed by the work as early as possible to minimize erosion and sedimentation. If it is not possible to permanently stabilize disturbed surfaces before winter, implement temporary protection measures.	X	X			ÉIE (2021)	Temporary protective measures have been put in place (rockfill), and restoration will be completed at the appropriate time.	
SUR 04	In watercourse crossing areas, perform deforestation work immediately before construction to minimize erosion.	X				ÉIE (2021)	Completed	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
SUR 05	Install a geomembrane on haul roads built with waste rock that are not located on waste rock piles.		X			Note technique (COMEX) Solution de recharge [...]	N/A – planned during the construction phase.	
SUR 06	Implement a QA/QC program during construction of the haul road, including the installation of the geomembrane, as well as during operations and restoration work.		X			Note technique (COMEX) Information supplémentaire [...]	N/A – planned during the construction phase.	
ENG-9	<p>Do not use leachable waste rock for the construction of industrial areas, camps, explosive storage, mine roads other than haul roads, or any other use on the mine site.[1]</p> <p>The materials (aggregates, stones, rocks, etc.) will come from the Société de Développement de la Baie James quarry at km 394 and the quantities required for the construction of the mine site are estimated at 30,000 m³.</p>	X	X			Demande d'engagements (COMEX, juin 2023)	Ongoing	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
NOR 01	<p>Restore work areas and stockpiles by levelling surfaces, covering them with natural soils, scarifying or seeding them to support revegetation. Stabilize reworked areas, embankment slopes, overburden stockpiles, etc., as work progresses.</p> <p>Reference: D019 for rehabilitation phase.</p>		X		X	ÉIE (2021)	N/A – planned during the construction phase.	

Residual Material

GMR 01	Store hazardous materials on sealed surfaces and non-hazardous materials with the potential to release contaminants in sealed containers. Both warehouses will be dry, protected from the elements, and well ventilated. Site security will be ensured.	X	X	X	X	ÉIE (2021)	Ongoing	Added commitment
GMR 02	For all residual materials generated on the site, GLCI must comply with the Quebec Residual Materials Management Policy, which stems from the Environment Quality Act. As part of the implementation of its management system, establish a program and			X	X	ÉIE (2021)	NA – planned during the operation phase.	Added commitment

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	procedures to ensure compliance with the 3RV-E principle.							

Soil, Water and Sediment Quality

QUA 01	Ensure that emergency kits for the recovery of petroleum products and chemicals are available in sensitive locations.	X	X	X	X	ÉIE (2021)	Ongoing	
QUA 02	Through frequent inspections, ensure that machinery is in good working order (clean with no contaminant leaks), and that fuel and lubricant tanks are sealed. Any discovered leaks require immediate repairs to the tank in question.	X	X	X	X	ÉIE (2021)	Ongoing	
QUA 03	Standard precautions should be taken during maintenance (draining, greasing, etc.) and refuelling of machinery on site to avoid any accidental spills.	X	X	X	X	ÉIE (2021)	Ongoing	
QUA 04	In the case of temporary storage of contaminated excavated material, take all the necessary actions to preserve the integrity of the surrounding soil and water and ensure the safety of workers (put piles on a sealed or impermeable surface,	X	X	X	X	ÉIE (2021)	N/A	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
	cover piles, restrict access to these piles, etc.).							
QUA 05	Continuously stabilize or protect exposed surfaces (revegetation) as soon as possible to reduce the transport of TSS and to limit the leaching of materials.	X	X		X	ÉIE (2021)	Ongoing	
QUA 06	Establish a well system on the periphery of the mining infrastructure to measure the drawdown and the rise of the water table in the sector of the pit.	X				ÉIE (2021)	Completed	
QUA 07	Carry out development work likely to alter the hydraulicity of watercourses outside the snowmelt period (April 15th to June 15th).	X				ÉIE (2021)	Completed	
QUA 08	Limit the transport of fine particles in the water environment beyond the immediate work area by effective means (sediment traps, sediment barriers, turbidity curtain, etc.).	X	X	X	X	ÉIE (2021)	Ongoing	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
QUA 09	Build a temporary bridge for machinery if crossing a watercourse is required. Set up bridging or an ice-bridge when building a trail across a watercourse or fish habitat (ref. NOR 05).	X				ÉIE (2021)	Completed	
QUA 10	Equip all fixed equipment containing oils and/or fuel (e.g., lighting tower, generator, crusher, sifter, etc.) located less than 60 m from a watercourse or body of water with a leakproof recovery system. Equipment must be equipped with absorbents for quick and effective response in the event of an accidental spill.		X	X	X	ÉIE (2021)	Ongoing	
QUA 11	Temporary facilities (e.g. construction site trailer, access road, storage areas, waste site) must be located more than 60 m from a watercourse.		X		X	ÉIE (2021)	Ongoing	
QUA 12	Any vehicle and machinery maintenance is prohibited outside the designated areas.		X	X	X	ÉIE (2021)	Ongoing	
QUA 13	Refuel vehicles and machinery at designated locations in accordance with good practices.		X	X	X	ÉIE (2021)	Ongoing	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
QUA 14 [2]	Monitoring of water quantity and quality at the truck stop drinking water well and drilling a new drinking water well in case drawdown of the groundwater makes the truck stop drinking water well unserviceable.	-		X		ÉIE (2021)	N/A	
QUA 15	Managing the explosive plant to be zero waste: - Sanitary discharges will be stored in a sealed tank and disposed of outside the site; - Waste oil and other non-recyclable discharges will be disposed of outside the site by an authorized company for reclamation or disposal; - Trucks with ANFO will be cleaned inside the building and wash water will be sent to the oil-water separator and then filtered and reused.			X		ÉIE (2021)	N/A, planned during the operation phase.	
QUA 16	Implement a groundwater monitoring program along haul roads.	X	X	X		COMEX 4e série, QC4-14, Note technique 2022 -05-24	Ongoing	
QUA 17	Implement a monitoring program for phosphorus in the final effluent discharge in the CE2 as well in groundwater.		X	X		COMEX, 4e série, QC4-45, QC4-75	N/A, planned when the effluent is discharged.	

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QUA 18	Surface water flows during thaw periods will be redirected from the work by diversion berms, ditches or other acceptable means and all surface flows within the construction area will be adequately controlled. Adequate drains, sumps, sheet piles and pumps and other approved means of dewatering will be used as necessary to remove all free water from the excavation.		X	X		ÉIE (2021)	Ongoing	Added commitment
QUA 19	Implement a surface water quality monitoring, including phosphorus, in which water quality results will be compared to the 2021 Environmental Discharge Objectives (EDOs), beginning in the construction phase.	X	X	X	X	COMEX, 4e série, QC4-11, QC4-14	Ongoing	
QUA 20	Implement a geochemical monitoring program for waste rock and tailings during operation, based on criteria of the Directive 019 (D019) as well as the material characterization procedure contained in the new <i>Guide de caractérisation des</i>			X		COMEX, 4e série, QC4-5	N/A, planned in the operation phase.	

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	<i>résidus miniers et du minerai</i> (Characterization Guide) issued by the MELCC in 2020.							
QUA 21	Meet remediation criteria for soils potentially contaminated with lithium, vanadium, or titanium. The criteria for lithium are 16 mg/kg for residential land use soils and 230 mg/kg for commercial/industrial land use soils. The criteria for vanadium are 39 mg/kg for residential land use soils and 86 mg/kg for commercial/industrial land use soils. For soils containing titanium and other contaminants covered by the Land Protection and Rehabilitation Regulation (LPRR) or the lithium or vanadium response guide, it is recommended that they be managed according to the criteria or standards applicable to those other contaminants. In the				X	COMEX, 4e série, QC4-51	N/A, planned during the closure phase.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
	case of soils containing only titanium, they can be managed according to the site-specific background levels after validation with the Ministry.							
QUA 22	The WTP will be equipped to meet the applicable criteria and strive towards compliance with the environmental discharge objectives (EDO). Contact water from the site will be channeled to the main water management basin and will undergo treatment before being discharged into CE2. The water quality results will be compared with the EDOs (2021) in accordance with the Guidelines for the use of environmental discharge objectives for industrial discharges into the aquatic environment in monitoring the water quality of mining effluent. This comparison will allow for adjustments to the necessary treatment before discharge into CE2.		X	X		COMEX, 4e série, QC4-101	N/A, planned during the construction phase.	Added commitment

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
QUA 23	Carry out monitoring of the water quality of the northern management basin as well as of the effluent which will flow into CE2, the comparison of the water quality results of the effluent will be made with the EDOs (2021) in accordance with the Guidelines for the use of environmental discharge objectives relating to industrial discharges into the aquatic environment.		X	X		COMEX, 4e série, QC4-16	N/A, planned during the construction phase.	Added commitment
QUA 24	Before the disposal of the WTP treatment sludge, it will be analyzed and will either be directed to a tailings and waste dump or considered as contaminated soil or residual hazardous materials after discussion with MELCCFP representatives.			X		ÉIE (2021)	N/A, planned during the operation phase.	Added commitment
ENG-2	Recover all contact water from the overburden pile by the sites water management system and treat it before it is discharged to the environment		X	X		Demande d'engagements (COMEX, juin 2023)	N/A, planned during the construction phase.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
NOR 02	<p>Manage excavation waste according to their degree of contamination and in accordance with the requirements of the Soil Protection and Rehabilitation of Contaminated Sites Policy.</p> <p>Reference: Q-2, r. 37 – Land Protection and Rehabilitation</p> <p>Regulation: Schedules I and II and Response Guide – Soil Protection and Contaminated Sites</p> <p>Rehabilitation: Table 5 – Soil recovery methods authorized in Québec.</p>		X	X	X	ÉIE (2021)	Ongoing	
NOR 03	<p>Dispose of contaminated excavation in accordance with the Contaminated Soil Management Grid set out in the <i>Guide d'intervention</i>. If disposal in the stockpile turns out to be a possible option, Galaxy will submit an application for authorization to the Ministry and only take action after issuance of said authorization.</p> <p>Reference: Q-2, r. 18 – Regulation respecting the burial of contaminated soils: Schedule I and Guide –</p>		X	X	X	ÉIE (2021)	N/A	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
	Soil Protection and Contaminated Sites Rehabilitation: Schedule 5 – Excavated soil management grid; Section 6.4.3.1 List of authorized treatment facilities.							
NOR 04	Dispose of surplus or unusable excavation waste (clay, silt, gravel, rock) with due care and in accordance with the Protection Policy for Lakeshores, Riverbanks, Littoral Zones and Floodplains and D019 to ensure adequate separation from water environments.		X	X	X	ÉIE (2021)	Ongoing	
NOR 05	Install culverts or crossing structures designed to maintain the free flow of water (and the free passage of fish). The construction of bridges or the installation of culverts shall not reduce the width of the watercourse by more than 20%, as measured from the natural high-water mark. The base of the lower culvert shall be driven below the natural bed of the watercourse at a depth of not less than 15 cm or 10% of the height		X			ÉIE (2021)	Completed	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
	of the structure and its ends shall extend beyond the base of the embankment by not more than 30 cm and be adequately stabilized. Reference: Regulation respecting standards of forest management for forests in the domain of the State.							
NOR 06	Install a minimum of three observation wells in the selected locations around the stockpile to verify groundwater quality upstream and downstream. Reference: D019, Section 3.3.4.1	X				ÉIE (2021)	Completed	Update of section number Directive 019 (version 2025)
NOR 07	Surround mining infrastructure with ditches so that drainage and runoff water is directed towards a basin and then treated as needed before being discharged into the environment. In addition, runoff water from outside activity areas shall be directed into drainage ditches, built around mine infrastructure to prevent these waters from sources of contamination (dilution prohibited).		X	X		ÉIE (2021)	N/A planned during the construction phase.	Update of section number Directive 019 (version 2025)

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
	Reference: D019, Section 3.2.3.							
NOR 08	<p>Ensure, before discharging the effluent water, that it complies with the standards.</p> <p>Reference: Metal and Diamond Mining Effluent Regulations, Section 4 and Schedule 4 and D019, Section 3.1</p>		X	X	X	ÉIE (2021)	N/A planned when the effluent is discharged	Update of section number Directive 019 (version 2025)
NOR 09	<p>In the event of an accidental spill, stop the leak as soon as it is identified, contain the product, and recover it using suitable equipment (absorbent sheets, flanges, drain covers, etc.). Immediately notify the Ministry. Excavate contaminated soil, place it in sealed containers and dispose of it in accordance with the hazardous materials management program. Advocate for quicker interventions to prevent deep infiltration.</p> <p>Reference: Environment Quality Act, Section 21 and Regulation respecting hazardous materials, Section 9.</p>	X	X	X	X	ÉIE (2021)	Ongoing, when needed.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
NOR 10	<p>Set aside overburden and segregate the topsoil for reuse when redeveloping disturbed areas.</p> <p>Reference: D019, Section 3.6.</p>		X		X	ÉIE (2021)	<p>The areas stripped in 2024 included the industrial site and the temporary road up to the CE3 culvert. No topsoil storage area was created. The topsoil was mixed with the overburden and used as part of the temporary road construction work. Topsoil segregation will be performed during future earthworks. This measure is included in procedure JBQ-ENV-PRO-0003, which is provided to the contractor in charge of the work.</p>	Update of section number Directive 019 (version 2025)

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
Atmosphere								
AIR 01 ENG-3	Regularly water roads, work areas, and stockpiles by moistening them to prevent resuspension and dust emission and keep a watering and BNQ certified dust control agent spraying logbook during the site construction and operation. The frequency and intensity of road watering will be combined to meteorological conditions and to the air quality monitoring. Present a summary demonstrating the effectiveness of this measure in the annual environmental monitoring report.	X	X	X		ÉIE (2021), COMEX, 4e série, QC4-21 et Demande d'engagements (COMEX, juin 2023)	Ongoing, when needed.	
AIR 02	Avoid unnecessary engine idling to reduce noise and disturbances from exhaust gas, smoke, dust, or any other contaminants likely to come from the machinery.	X	X	X	X	ÉIE (2021)	Ongoing	
AIR 03	Limit the vehicle speed on the various sites, including mine operations.	X	X	X	X	ÉIE (2021)	Ongoing	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
AIR 04	Instead of burning, proceed as much as possible with chipping tree removal residue and clear brush at the work site and then spread.	X	X			ÉIE (2021)	Ongoing, when needed.	
AIR 05	Optimize stripping according to the actual needs of the operation so as not to overexpose unused stripped surfaces to wind erosion and/or restrict, if necessary, access to these surfaces if they are not used for long enough periods.		X	X		ÉIE (2021)	N/A planned in the construction phase.	
AIR 06	Monitor total particulate matter (TPM), breathable particulate matter (PM10), fine particulate matter (PM2.5) and crystalline silica, especially close to the truck stop, from the start of operations.		X	X		ÉIE (2021)	Ongoing	
AIR 07	Ensure regular maintenance of the dust collectors to ensure cleaning efficiency at all times.			X		ÉIE (2021)	N/A, planned in the operation phase.	
AIR 08	Submit to MELCC for approval, detailed air quality sampling specification prior to the start of the construction phase.		X			COMEX, 4e série, QC4-32	Completed	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
AIR 09	Implement a dust emission management plan in which the ambient air quality monitoring program proposed for the project will include ambient air quality monitoring of total particulate matter, PM10, PM2.5, crystalline silica, NO ₂ and selected metals.		X	X		COMEX, 4e série, QC4-32	Ongoing	
AIR 10	Update the air dispersion modeling in the operation phase. If modelled concentration at sensitive receptors still exceeds applicable limit values, additional mitigation measures will be evaluated and their impacts on concentrations determined through modelling.			X		COMEX, 4e série, QC4-32	N/A, planned in the operation phase.	
AIR 11	Complete monitoring of GHG emissions by mobile sources by compiling fuel consumption of vehicles and machinery throughout the life of the project.	X	X	X	X	COMEX, 4e série, QC4-85, QC4-132	Ongoing	

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AIR 12	Apply a BNQ-approved dust suppressant if dust concentrations exceed regulatory criteria. Water could also be used using a tanker truck equipped with a spray boom.		X	X		COMEX, 4e série, QC4-42	N/A planned in the construction phase.	Added commitment
NOR 11	Ensure that vehicle and machinery exhaust systems are in good condition and function optimally to minimize contaminant emissions into the air and ensure that the same is true for dust control systems for equipment and machines that are equipped. Reference: Clean Air Regulation, Section 6.	X	X	X	X	ÉIE (2021)	Ongoing	
Artificial Light at Night								
LUM 01	Restrict the emission of light toward the sky using fixtures that produce moderate and uniform lighting that meets the real lighting needs with a luminous flux that would be directed toward the surface to be illuminated.	X	X	X		ÉIE (2021)	Ongoing	
LUM 02	Limit the period and duration of the use of the lights at night.	X		X		ÉIE (2021)	Ongoing	

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LUM 03	Install fixed lights to avoid light spilling out of the areas that need to be illuminated and pay attention to the orientation of portable lights and lighting from mobile sources.	X	X	X		ÉIE (2021)	Ongoing	
Ambient Noise								
SON 01	Ensure that motorized equipment (trucks, loaders, bulldozers, backhoes, etc.) are equipped with efficient silencers and are in good condition.	X	X	X	X	ÉIE (2021)	Ongoing	
SON 02	Inspect regularly machinery to make sure exhaust systems are in good condition to minimize noise emissions.	X	X	X	X	ÉIE (2021)	Ongoing	
SON 03	Develop a mound with waste rock at the south perimeter of the east waste rock and tailings storage facility (WRTSF) to have a shielding effect between mobile equipment circulating at the top of the WRTSF and ruck stop at km381. This mound will evolve with the elevation of the WRTSF.			X		ÉIE (2021)	N/A, planned in the operation phase.	

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NOR 12	The reference noise level of a fixed source associated with a mining activity shall be assessed in accordance with the requirements of Instruction Note 98-01. Reference: D019, Section 3.4.	X	X	X		ÉIE (2021)	Ongoing	Update of section number Directive 019 (version 2025)

Vibrations and Overpressure

VIB 01	Notify all employees and the public in the vicinity about the blasting schedule.		X	X		ÉIE (2021)	N/A, planned during blasting activities.	
VIB 02	For blasting activities, maintain a maximum of 4 holes exploding in 8 ms to ensure compliance with the vibration criteria of D019.		X	X		ÉIE (2021)	N/A, planned during blasting activities.	
VIB 03	To limit air overpressure, perform blasting activities in the absence of thermal inversion and carrier wind, when activities will be carried out within 800 m of the km 381 truck stop.		X	X		ÉIE (2021)	N/A, planned during blasting activities.	
VIB 04	Use blasting mats and a bench height of at least 5 m when the blasting will be carried out within 500 m of the km 381 truck stop and the Billy-Diamond Highway, to limit rock projections.		X	X		ÉIE (2021)	N/A, planned during blasting activities.	The term "collar" was replaced by "bench".

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VIB 05	Implement a self-noise and vibration monitoring system during blasting operations.		X	X		ÉIE (2021)	N/A, planned during blasting activities.	
NOR 13	Comply with the maximum distances and loads during blasting to adhere to the criteria of D019 and the threshold guidelines regarding the use of explosives in or near Canadian fisheries waters. Reference: D019, Section 3.4 and Fisheries Act, para. 35(2) and Guidelines for the use of explosives in or near Canadian fisheries waters, p. 6, paragraphs 8 and 9.		X	X		ÉIE (2021)	N/A, planned during blasting activities.	Update of section number Directive 019 (version 2025)

Vegetation and Wetlands

VEG 01	Carry out tree clearing to direct their fall into the areas to be cleared. Do not leave any logging residues in watercourses and areas not affected by the work.	X	X			ÉIE (2021)	During tree cutting activities.	
VEG 02	Choose native plant species suitable for mine site rehabilitation and appropriate to the hardiness zone.				X	ÉIE (2021)	N/A, planned in the closure phase.	

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VEG 03	To prevent the introduction of invasive alien plant species (IAPS), clean the excavation machinery or vessels before using them on site.	X	X	X	X	ÉIE (2021)	Ongoing	
VEG 04	Recover tree species with commercial value, recover other types of wood by chipping them and using them to condition soil.	X	X			ÉIE (2021)	During tree cutting activities.	
VEG 05	When researching potential projects to compensate for the loss of wetlands, avoid using old sand pits or quarries as potential sites.	X	X	X		Note technique 2022 -05-24	Ongoing	Added commitment
VEG 06	Annually validate potential introduction or non-introduction of IAPS up to two years after completion of work and one year after restoration, and promptly eradicate, to the extent possible, any new IAPS occurrence observed.	X	X	X	X	ÉIE (2021)	Ongoing	

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ENG 6	<p>When restoring the site, maximize the areas converted to wetlands and seed or plant a greater diversity of plant species, taking into account species valued by the Cree and climate change.</p> <p>Include this measure in the first update of the restoration plan.</p>				X	Demande d'engagements (COMEX, juin 2023)	N/A, planned in the closure phase.	
NOR 14	<p>Maintain a riparian protection area of 10 to 15 m, depending on the side slope, around wetlands, watercourses, and waterbodies.</p> <p>Reference: Protection Policy for Lakeshores, Riverbanks, Littoral Zones and Floodplains, Sections 3.1 and 3.2.</p>		X			ÉIE (2021)	Ongoing	
NOR 15	<p>Develop a compensation plan for the loss of wetlands.</p> <p>Reference: Act respecting compensation measures for the carrying out of projects affecting wetlands or bodies of water, Section 2.</p>		X			ÉIE (2021)	Ongoing	
Fauna								

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
FAU 01	Perform work in the water during the low-risk period, from July 1st to August 31st for brook trout, and from July 15th to April 15th for northern pike.	X	X			ÉIE (2021)	Ongoing	
FAU 02 ENG-4	Prohibit deforestation activities between May 1st and August 15th to minimise impacts on fauna during key nesting periods.		X	X		Demande d'engagements (COMEX, juin 2023)	Ongoing	
FAU 03	Identify and report areas with the highest risk of collision with large mammals through adequate signage.		X	X		ÉIE (2021)	Ongoing	
FAU 04	Prior to the demolishing a building or other facility, carry out an inspection (concealed spaces) to verify its possible use as maternity or dwelling place by bats. Where appropriate, protective measures will be taken to ensure the survival of bats.			X	X	ÉIE (2021)	N/A, planned in the operation phase.	
FAU 05	Ensure workers are aware that it is important not to feed animals and not to leave food out, as not to attract wildlife near work areas.	X	X	X	X	ÉIE (2021)	Ongoing	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
FAU 06 [3]	Provide scare measures in the event of bird use of water management ponds..	-		X		ÉIE (2021) Amendment following discussions with federal authorities	Ongoing	
	Implement measures to prevent the use of water management basins by migratory birds or bird species at risk.							
FAU 07	Limit use of borrow pits as nesting site for birds by smoothing the slope and using scare tactics. If nesting does occur, create an area prohibited for operation until nesting is complete.		X	X		ÉIE (2021)	N/A, planned the in the construction phase.	
FAU 08	Once the authorizations are received, Galaxy is committed to creating a joint working group (Galaxy, Eastmain and Waskaganish) to discuss possible monitoring of caribou. The frequency of these meetings will be determined later with the participants.		X	X		ÉIE (2021)	N/A, planned in the construction phase.	Added commitment
FAU-10	Limit wildlife access to food waste by the implementation of a composter, and by installing lids on garbage cans.		X	X		ÉIE (2021)	N/A, planned in the construction phase.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
ENG-5	Physically restrict bear access to the waste management area and the composter as soon as they are put into operation.			X		Demande d'engagements (COMEX, juin 2023)	N/A, planned in the operation phase	
NOR 16	Develop a compensation project for the loss of fish habitat. Reference: Act respecting the conservation and development of wildlife, Chapter IV.1; <i>Lignes directrices pour la conservation des habitats fauniques</i> ; Fisheries Act, Section 35(2)b and Metal and Diamond Mining Effluent Regulations, Section 27.1 (if deposit of deleterious substances into fish habitat).			X		ÉIE (2021)	Completed	

Use of land for traditional purposes

UTT 01	Ensure workers are aware of traditional practices of Indigenous communities and activities of Indigenous users of the territory. Make drivers aware of the presence of land users near the Billy-Diamond Highway through training, awareness campaigns and warnings.	X	X	X	X	ÉIE (2021) Addition following discussions with federal authorities and First Nations	Ongoing	
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Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
UTT 02	Establish and maintain a communication plan to inform the public, users, and municipal authorities about the start and progress of work.	X	X			ÉIE (2021)	Ongoing	
UTT 03	Conduct beaver dam inspections at regular intervals to identify any changes to the CE2 water level and flow and notify the community of these changes.	X	X	X		ÉIE (2021)	Ongoing	
UTT 04	Prohibit hunting, recreational fishing and trapping for workers at the mine site, with a clause in their contract, and appropriate disciplinary measures.	X	X	X	X	ÉIE (2021)	Ongoing	
UTT 05	Provide a fund in the IBA with the Cree community of Eastmain to finance intergenerational traditional knowledge initiatives.	X				ÉIE (2021)	Completed, IBA is signed.	
UTT 06	Encourage activities, such as stopping production and doing care and maintenance for roughly 10 days, that limit wildlife disturbance and road traffic during goose hunting season, as well as facilitating the practice of traditional			X		ÉIE (2021) Modification following discussion with federal authorities and First Nations	N/A, planned in the operation phase.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
	<p>activities for Cree-workers.</p> <ul style="list-style-type: none"> - Reduce waste rock handling on site by 30% for 2 weeks during the goose and moose hunting seasons. - Reduce the number of blasts of 3 per week to 1 per 5 days, for 3 weeks during the goose hunting period. - Do the blasting between 1 PM and 3 PM during the day to avoid hunting hours. - Schedule the blasting, when possible, on a day in the week when forecasted weather conditions are not conducive to goose hunting (i.e., when the wind is coming from the north). - Reduce the transport of concentrate on the Billy-Diamond Road to 8 trucks per day (16 round trips) for 2 weeks during the goose hunting period and 2 weeks during the moose hunting period. 							

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
UTT 07	Work in partnership with SDBJ, and impacted communities, to identify camps/trails along the Billy-Diamond Road between Matagami and km 382 by the installation of signs marking their presence and therefore sensitize truckers to the use of the road.		X	X	X	Addition of this measure following discussions with federal authorities and First Nations	N/A, planned in the construction phase.	
Traffic and Infrastructure								
CIR 01	Establish a traffic management plan, including the addition of appropriate signage in specific areas, indicating speed limits to follow, and snowmobile and ATV crossings.		X	X	X	ÉIE (2021)	N/A, planned in the construction phase.	
CIR 02	Secure mine infrastructure at risk for land users by adding fencing.		X	X		ÉIE (2021)	N/A, planned in the construction phase.	
CIR 03	Ensure that public routes are free of any obstruction of debris, waste, dirt, sediment, etc.		X	X	X	ÉIE (2021)	N/A, planned in the construction phase.	
CIR 04	With the Tallyman, establish an area closed to traditional activities for security purposes.	X				ÉIE (2021)	Completed	
CIR 05	Limit traffic of machinery to work areas.	X	X	X	X	ÉIE (2021)	Ongoing	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
CIR 06	Prohibit access to the mine site if mining operations are temporarily suspended.		X	X		ÉIE (2021)	N/A, if necessary	
CIR 07	Install a protection berm around the pit to ensure the safety of land users at the end of the project, in accordance with the Section 4.5.2 of the Guide for the Preparation of a Mine Site Rehabilitation and Restoration Plan in Quebec (MERN, 2017).				X	ÉIE (2021)	N/A, planned during the closure phase.	
CIR 08	Train truck drivers appropriately and confirm that they have a valid license, and are qualified and have followed the required training programs. Train drivers assigned to the transport of hazardous materials (THM), on the transport of such materials. All drivers will also be warned about the risks of using the Billy Diamond Road, Cree territory use in the vicinity of the road, and the risk associated with winter driving and night driving. Drivers will have to comply with the applicable limit regarding hours spent driving, and conduct			X	X	ÉIE (2021)	N/A, planned in the operation phase.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
	quarterly driver training and meetings to discuss driver safety, awareness, and sensitive areas.							
CIR 09	Install tachograph in the trucks carrying the concentrate.			X		ÉIE (2021)	N/A, planned in the operation phase.	
CIR 10	Keep a register of drivers' training records.			X	X	ÉIE (2021)	N/A, planned in the operation phase.	
CIR 11	Complete routine inspection for validation of the state of the vehicle before driving on the road. Trucks must have adequate lighting and clean windows and mirrors, and be maintained in such a way that they allow unobstructed vision. Inspection records will be kept.		X	X	X	ÉIE (2021)	N/A, planned in the construction phase.	
CIR 12	Consider weather conditions before leaving or going to project site.	X	X	X	X	ÉIE (2021)	Ongoing	
CIR 13	Develop procedures for the proper management of truck breakdown on the road.			X	X	ÉIE (2021)	N/A, planned in the operation phase.	
CIR 14	Establish a protocol for radio communication between drivers, site and shipment yard.			X		ÉIE (2021)	N/A, planned in the operation phase.	The term "radio" has been removed. Communications will be via cellular when

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
								cellular coverage will be available.
CIR 15	Monitor any accidents along the highway to see if there is a recurrence, to validate and determine problems. If any, propose corrective measures. Record all problems encountered on the road in the mine's global incident management log.		X	X	X	ÉIE (2021)	Ongoing	
CIR 16	Avoid animal intrusion into the container space for RM (residual materials) management. The container itself will not allow access to animals and access to the container's storage area will also be controlled by wire mesh or fencing. The container will be equipped with a bear-proof skip.			X		ÉIE (2021) Changement apporté suite à des discussions internes	N/A, planned in the operation phase.	
CIR 17	Widen the Billy-Diamond Road to include a turn lane to ensure safe entry and exit from the site.	X				ÉIE (2021), COMEX, 4e série, QC4-76	Completed	
CIR 18	Raise awareness to all subcontractors, suppliers, contractors, and employees to drive safely and to follow traffic law.	X	X	X	X	COMEX, 4e série, QC4-76	Ongoing	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
CIR 19	Prohibit night traffic except for emergencies.	X	X	X		COMEX, 4e série, QC4-76	Ongoing	
CIR 20	Maintain a record of wildlife sightings along Billy-Diamond Road (km 0 to 382) and of wildlife incidents. Propose corrective measures in the event of recurrence of wildlife incidents.	X	X	X		COMEX, 4e série, QC4-81	Ongoing	
INFR 01	Develop a monitoring program for the mine pit walls, waste rock and tailing storage facilities (WRTSFs), the overburden and peat storage facility (OPSF) and the water management ponds. This program is planned for the operation phase and will include monitoring by visual inspections and instrumentation.			X		COMEX, 4e série, QC4-82	N/A, planned in the operation phase.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
INFR 02	Implement a geotechnical monitoring program for the waste rock and tailings storage facilities for the period of mining operations, as per Section 3.9 of Directive 019. This monitoring program will be submitted no later than the first application for environmental authorization under Section 22 of the Environmental Quality Act for the construction of the mine site. The results of this monitoring will be presented as part of the annual environmental monitoring report.		X	X		COMEX, 4e série, QC4-83	N/A, planned in the construction phase.	Update of section number Directive 019 (version 2025)
Perception of the Physical Environment								
PER 01	Have monitoring and environmental quality monitoring reports available annually on a website dedicated to this purpose and present them to the tallymen if requested.	X	X	X		ÉIE (2021)	Ongoing	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
PER 02	<p>Submit an annual report on the Galaxy Monitoring Committee's activities and make it public. The annual report, the content of which will be defined more specifically in collaboration with the committee members, will include at least the following elements:</p> <ul style="list-style-type: none"> — the nature and number of activities carried out; — the roles and mandates of the local stakeholders involved; — the topics and concerns addressed; — the actions taken; — the level of satisfaction of local stakeholders; — the follow-up given or not given to recommendations, if applicable. 		X	X		ÉIE (2021)	<p>N/A, The Galaxy monitoring committee was established in 2024. There was only one virtual meeting in May 2024. This monitoring committee will be more active during the construction of the project.</p>	Added commitment

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
PER 03	<p>Conduct presentation and information sessions on environmental monitoring results once or twice a year with members of the Cree communities of Eastmain, Waswanipi and Waskaganish. Presentations may be given in English and Cree to ensure that all attendees have a good understanding of the information presented. The tallymen will be consulted to determine the topics covered and the frequency of these meetings.</p>		X	X		ÉIE (2021)	N/A, planned in the construction phase.	Added commitment
Quality of Life								
VIE 01	Establish an ongoing dialogue with the population through an in-house community relations department and communications program.	X	X	X		ÉIE (2021)	GLCI's community relations team has a communications plan for the Galaxy project. In 2024, it increased visibility on the project's Facebook page and offered information sessions to the Eastmain population every 3 months.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
VIE 02	Establish and implement a Galaxy Lithium code of ethics and ensure that all workers are well informed of its contents.		X	X	X	ÉIE (2021)	Rio Tinto has a code of ethics that will be implemented in 2026.	
VIE 03	Prohibit the consumption of alcohol and drugs at the on-site workers' camp.	X	X	X	X	ÉIE (2021)	GLCI has a 0-tolerance policy regarding alcohol and drugs at the site camp. When people are hired, this is mentioned in their employment contract and during introductory training on the site.	
VIE 04	Offer healthy, balanced menus (low sugar and trans fat) at the workers' camp cafeteria.		X	X	X	ÉIE (2021)	<p>Not applicable in 2024.</p> <p>In 2024, the Galaxy project workers were using the cafeteria at the 381 Truck Stop. Until the permanent kitchen is open, it will be difficult to control menus. Some positive changes in terms of lower-calorie, low-sodium menu choices have been made, for example more healthy choices have been offered as daily specials by the Truck Stop restaurant.</p>	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
VIE 05	Establish, with Cree community representatives, an annual calendar of the main traditional activities and set production stoppage times according to their participation in these activities. Grant leave requests during periods of traditional activities.			X		ÉIE (2021)	Not applicable in 2024 or during the construction period. However, the employer of Cree workers (Stajune) is aware of this situation and reconciles work with traditional activities.	
VIE 06	Ban all forms of video lottery and gambling on the site.	X	X	X	X	ÉIE (2021)	This measure is difficult to implement. However, no video lottery or gambling is available at truck stop 381.	
VIE 07	In collaboration with the Cree liaison officer and the CCSSSBJ, Galaxy's human resources department will set up a program to raise worker awareness of various social issues: sexual harassment, prostitution, alcohol and drug abuse, gambling, financial management, violence and any other problems that may develop during mine operations.			X		ÉIE (2021)	A document outlining expectations for civility and respect on the site will be implemented in 2025. This information is included in new employee induction training. A comprehensive awareness program will be presented when operations staff are hired.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
VIE 08	Offer working conditions adapted to pregnant women in compliance with the "Pour une maternité sans danger" program of the Commission des normes de l'équité de la santé et de la sécurité du travail (CNESST).	X	X	X		ÉIE (2021)	Project Galaxy follows CNESST standards for all its workers.	
VIE 09	Offer ITSS screening services to workers and their families, in collaboration with CCSSSBJ.			X		ÉIE (2021)	This measure is not currently applicable. We will have to see how it can be implemented during the operational phase of the Galaxy project.	
VIE 10	Ensure that telephone and/or Internet services are available at the camp to facilitate communication between workers and their families.	X	X	X		ÉIE (2021)	Internet services are available at Galaxy's temporary camp at Relais routier 381 during the construction period. However, telephone services remain limited. Only Eeyou Communication users have access to the cellular network at the site. Eeyou Communication has a roaming agreement with Rogers and Vidéotron, allowing these users access to the cellular network as well.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
VIE 11	Authorize family visits if workers are employed on the mine site during special holidays.			X		ÉIE (2021)	Not applicable during construction period. This measure will have to be updated before the start of the operation phase.	
VIE 12	Do not tolerate violence on sites where employees live and work, and impose disciplinary measures if a person is found guilty of violence or harassment.	X	X	X		ÉIE (2021)	Violence and harassment are not tolerated at the Galaxy project site, or even within the company. Training and reminders to this effect are given to site employees. Contractors must also follow this rule.	
VIE 13	Ensure that a section of the workers' camp is reserved for women to preserve their privacy.		X	X		ÉIE (2021)	Due to a lack of space at the temporary project camp, this measure was not applicable in 2024. However, women do not share a bathroom with men. They have their own private bathroom or share it with just one other woman (Jack and Jill). If necessary, additional measures will be taken during the operation phase.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
VIE 14	Include at least one woman in Galaxy's human resources team to facilitate exchanges with Cree and non-Cree workers.			X		ÉIE (2021)	This measure is not applicable during the construction period. This measure will need to be updated before the start of the operation phase. However, the Eastmain Cree Community Liaison Officer will be able to fulfill this role during the construction phase.	
VIE 15	Develop a system for receiving and handling complaints before construction begins and up to the closure period. A report on the nature of complaints received by Galaxy and how they have been handled will be presented to members of the monitoring committee at each of its meetings.	X	X	X	X	ÉIE (2021)	A protocol for managing complaints and concerns was developed and updated in 2024 in view of the merger leading to Arcadium Lithium. The process was presented to members of the Galaxy Monitoring Committee in May 2024. Given Rio Tinto's acquisition of the project, it will need to be updated again in 2025 or before the construction phase begins.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
VIE 16	Maintain good relations between Galaxy and the Cree First Nations.	X	X	X	X	ÉIE (2021)	Ongoing - Galaxy maintains good relations with the Cree First Nations, the Cree Nation Government, the Cree Nation of Eastmain and the two communities of Waskaganish and Waswanipi. Ongoing dialogue is established with the Chief of the Cree Nation of Eastmain, notably through meetings of the IBA implementation committee.	
VIE 17	Avoid wasting food and equipment at the mine and offer any surplus to Cree aid groups via the Environment Committee.	X	X	X	X	ÉIE (2021)	Surplus food from a catering service not used by workers was donated to the Eastmain community on October 20, 2024.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
VIE 18	At the request of and in collaboration with the Council of the Eastmain Nation, a recognition ceremony for Mother Nature will be held at the future mine site before construction begins.	X				ÉIE (2021)	Completed - An opening ceremony was held at the site on June 7, 2024, prior to the start of construction. The date had been agreed with the Chief of the Cree Nation of Eastmain and the RE02 tallyman. Some sixty community members from Eastmain, Waskaganish and GLCI attended the ceremony.	
VIE 19	According to km 381 truck stop regulations and Galaxy policies, prostitution is not tolerated, and police intervention is requested if a case is reported.	X	X	X		ÉIE (2021)	Prostitution is not tolerated at the site.	
VIE 20	Galaxy's Human Resources Department records cases involving police calls in the files of Galaxy employees and subcontractors.			X		ÉIE (2021)	Any case of criminal activity committed by a person working on the Project site will be referred to the authorities.	
VIE 21	Inclusion of Cree worker schedule and benefits in the Impact and Benefits Agreement (IBA) with the Cree Nation of Eastmain.	X				ÉIE (2021)	Completed, the IBA is signed.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
VIE 22	<p>Creation of a follow-up committee to include representatives of the Eastmain and Waskaganish Cree Nations, the James Bay Eeyou Istchee Regional Government and the tallymen of traplines RE1, RE2, RE3, VC33, VC35 and R08. The tallymen of traplines north of the Eastmain River will be invited to sit on the Monitoring Committee and other committees as they see fit.</p> <p>This committee will be created in response to the Mining Act, Division V, art. 101.0.3.</p>	X	X	X		ÉIE (2021) Addition in response to email from Guillaume Clément-Mathieu (JAC)	<p>The Galaxy Follow-up Committee was formed in 2024, and the first meeting was held on May 29, 2024. Meetings are held twice a year, or at least once a year for the time being. A reference document has been created, including a list of Cree and non-Cree member organizations in the territory. However, the tallymen are not on this committee, as they prefer to be informed in person.</p>	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
VIE 23	Ensure that a health clinic is available at the SDBJ camp site as soon as construction begins. Develop, update as needed, and adapt according to project activities, the emergency and crisis intervention plan.	X	X	X	X	COMEX, 4e série, QC4-66, QC4-108	A health clinic with an on-site nurse has been available at the Galaxy project's temporary camp since 2024. An emergency vehicle is also available at the temporary camp infirmary, ready for use in the event of an emergency. Paramedical and ambulance services are also available from Relais Routier 381. An emergency response plan has also been developed and revised in 2024.	
VIE 24	Inform the RE2 tallyman in advance of planned on-site activities.	X	X	X	X	ÉIE (2021)	Ongoing	Added commitment
VIE 25	Implement the policy that requires its employees and those of its subcontractors and business partners to be physically, mentally and emotionally fit to work, and to not pose a risk to their own well-being or that of others. This policy requires, in particular, that supervisors or managers assess the fitness to work of employees under their responsibility, whether		X	X		ÉIE (2021)	A medical assessment is required to access the site. The medical service (on-site nurse supported by a remote physician if necessary) is responsible for assessing the health of people wanting to access the site.	Added commitment

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
	by observation or by means of tests.							
VIE 26	Implement a travel management procedure, where each trip of its employees, subcontractors and business partners to the mining site is recorded. Galaxy thus controls the identity of its mobile workforce on the mine site. Currently, this procedure applies to the pre-construction phase and will be updated for the construction and operation phases.	X	X	X		ÉIE (2021)	Ongoing	Added commitment
VIE 27	Galaxy will propose measures to encourage healthy lifestyle habits such as healthy and balanced menus (low sugar and trans fat levels) or the installation of a gym on the camp site.			X		ÉIE (2021)	N/A, planned in the operation phase.	Added commitment

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
VIE 28	Galaxy intends to propose, in partnership with the DCRH and the Cree School Board, the development of specialized training and development programs to fill positions at the mine. These programs could be offered in Cree communities and supported by Galaxy depending on the progress of the project and the certainty of its completion.			X		ÉIE (2021)	A working group, including the school board, the Cree school board, Apatiniiw skills development corporation and Stajune, is collaborating to identify and implement training programs aimed at training the local workforce in connection with the jobs created during the construction and operation phases.	Added commitment
Local and Regional Economy								
ELR 01	Establish a purchasing policy that gives priority to local and regional companies in invitations to tender, when competence and price are competitive.	X				ÉIE (2021)	Completed - There is no purchasing policy as such that would give priority to local and regional companies in calls for tender. However, GLCI follows the contract award mechanism stipulated in the Impact and Benefits Agreement (IBA) signed with the Cree Nation of Eastmain and the Cree Nation Government.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
ELR 02	Offer training programs for local workers, where possible, to fill positions at the mine. Organize training in partnership with DCRH to enable Cree Nation workers to access jobs at the mine.		X	X		ÉIE (2021), COMEX, 4e série, QC4-110	Under the IBA and the agreement signed with GLCI, WEDC is mandated to deploy training programs for local workers in the Eastmain community. These training programs enable the Cree to work for Stajune in the pre-construction or construction phase, and gradually for jobs in the operation phase.	
ELR 03	Prioritize the Cree workforce, then the regional workforce, with equal skills, for positions to be filled.			X		ÉIE (2021), COMEX, 4e série, QC4-110	A mechanism is in place to maximize local employment in the construction phase and the IBA provides for the prioritization of local labor when jobs become available during the operational period.	
ELR 04	Develop a Memorandum of Understanding and Partnership for Aboriginal participation in the project (Impact and Benefit Agreement).		X			ÉIE (2021)	Completed, the IBA is signed.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
ELR 05	Implement mechanisms for worker integration, particularly for members of Aboriginal communities (information sessions, dedicated human resources worker, employee assistance program, etc.).	X	X	X		ÉIE (2021)	The WEDC is in charge of hiring Cree employees. They have hired on-site superintendents to ensure the smooth integration of Cree workers with the project contractors. A Cree cultural awareness program was developed, including twinning activities, traditional Cree meals, etc.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
ELR 06	A communications committee and Galaxy's human resources department will communicate with local stakeholders and visit schools to provide information on positions to be filled at the mine.		X	X		ÉIE (2021)	A communications committee is not currently planned as part of the IBA. However, local stakeholders are in constant communication with Galaxy through the IBA implementation committee. Galaxy's human resources department participates in regular meetings of a WEDC-led training committee. One of WEDC's mandates is to visit schools to promote job opportunities at the mine, in collaboration with GLCI. To date, only the Eastmain school has been visited. These visits will be extended to schools in Eeyou Istchee Baie-James later in the construction and operation phases.	
ELR 07	Regularly update operating life forecasts and announce mine closure in advance.			X		ÉIE (2021)	N/A, planned in the operation phase.	
ELR 08	Implement an employee assistance program to provide support during the transition to closure (e.g., outplacement committee).			X	X	ÉIE (2021)	N/A, planned in the operation phase.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
ELR 09	Participate in a committee to maximize economic benefits (COMAX).		X	X		ÉIE (2021)	The COMAX has not yet been set up by the Société du Plan Nord. However, discussions have already taken place regarding its constitution. Given the various mergers and acquisitions, we were waiting to enter the construction phase.	
ELR 10	Work with the Eastmain Cree Nation Council to ensure the highest number of Cree recruits.		X	X		ÉIE (2021)	N/A, planned in the operation phase.	
ELR 11	Train recruiters and managers to recognize stereotypes and cognitive biases related to the type of work women can do, especially in non-traditional roles.			X		ÉIE (2021)	N/A, planned in the operation phase.	
ELR 12	Adopt a meritocratic hiring process, from the CV review and selection phase through to final offers.			X		ÉIE (2021)	N/A, planned in the operation phase.	
ELR 13	Offer flexibility as to the time and place of training offered to access employment, where possible.			X		ÉIE (2021)	N/A, planned in the operation phase.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
ELR 14	Ensure development assistance for women focused on specific skills, such as influencing and networking. Offer specialized on-site training and development sessions. Provide networking opportunities for women to exchange information and support each other.			X		ÉIE (2021)	N/A, planned in the operation phase.	
ELR 15	Offer jobs based in the community of Eastmain in addition to those at the mine, to enable women to be close to their families.			X		ÉIE (2021)	Not applicable at this time. However, 2 jobs related to the Galaxy project have been created in the community of Eastmain, namely the community liaison officer and the employment coordinator at Stajune. Job creation in the community of Eastmain is planned for the operations phase, given that the jobs offered during the construction phase are managed by WEDC, as agreed in the IBA.	
ELR 16	Submit to the MELCCFP a detailed follow-up program for impacts on the human environment, which will include monitoring spinoffs on training, employment	X				ÉIE (2021)	Completed, the program was submitted to the MELCCFP on February 2 nd 2024.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
	and the economy of regional communities.							
ELR 17	Encourage training and employment among young people by making presentations in the region's schools (high schools and CEGEPs), in collaboration with the latter, and the relevant school boards. Galaxy will inform students of all the job opportunities in the mining sector that are available upon graduation. To this end, posters presenting job opportunities at the Galaxy mine will be displayed in schools and public buildings, and career days will be organized involving different types of workers in the mining sector. Guided tours of the mine will also be offered to local students.		X	X		ÉIE (2021)	<p>N/A, planned in the construction phase.</p> <p>Not yet started. However, in Eastmain, each year the Galaxy project participates in the annual career days organized by the Eastmain school, and the WEDC is also responsible for promoting training opportunities related to the Galaxy project to the local population and young people.</p>	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
ELR 18	Hire a Community Liaison Officer for the Eastmain Cree Nation during all phases of the project. His role will be to inform the Cree population of the jobs and contracts offered by the company, to ensure the harmonious integration of Cree workers among the workers at the mine site, to communicate the concerns of the Cree population to the company, including land users, and to participate in finding solutions to resolve conflicts.		X	X	X	ÉIE (2021)	A part-time Eastmain Community Liaison Officer (CLO) was hired in May 2024. When the construction phase begins, she will assume her role on a full-time basis.	
ELR 19	Develop and maintain lasting relationships with stakeholders, with the aim of maximizing the social and economic benefits and minimizing the potential environmental impacts of the project. Continue the exchange of information about the project by organizing information-sharing sessions with stakeholders, ensuring the presence of GLCI's Community Relations Manager in the community one week per month, and reaching	X	X	X		ÉIE (2021)	Ongoing	Added commitment

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
	out to the community via their website and through direct contact with their employees.							
Heritage and Archaeology								
ARC 01	Ensure workers are aware of the obligations regarding fortuitous archaeological discoveries.	X	X	X		ÉIE (2021)	Ongoing	
ARC 02	Notify the RE2 trapline tallyman, the Eastmain Nation council, and the Cree Nation Government's Culture and Language Department upon discovery of artefacts.	X	X	X		ÉIE (2021)	N/A – to implement in due course.	
NOR 17	Report to the officials of the various building sites any fortuitous discovery and halt work at the location of the discovery until it can be fully assessed. Officials must notify the Minister immediately. Obtain formal authorization from these officials before resuming work. Reference: Cultural Heritage Act, Section 74.	X	X	X		ÉIE (2021)	N/A - to implement in due course.	

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
NOR 18	Have any archaeological site discovered assessed, by a professional, to determine the extent of work required (e.g., excavation) to protect archaeological discoveries. Reference: Cultural Heritage Act, Section 76.	X	X	X		ÉIE (2021)	N/A - to implement in due course.	
NOR 19	Obtain an archaeological research permit to conduct any excavations or surveys of the property or archaeological sites. Reference: Cultural Heritage Act, Section 68.	X	X			ÉIE (2021)	N/A - to implement in due course.	
Landscape								
PAY 01	Model the top of the waste rock stockpile to round it and integrate it into the landscape.				X	ÉIE (2021)	N/A – planned at a later stage of the project.	
Consultation with Communities								

Code	Description	Pre-construction	Construction	Operation	Closure Post-closure	Reference	Status / Follow-up	Changes made since version 0 (February 12, 2024)
ENG-10	<p>Inform the communities and concerned land users of the relocation of the West stockpile from the project definition and the resulting implications by using the most appropriate communication channels.</p> <p>Submit a written document to the Administrator, reporting the comments provided and assessments received.</p>		X			Demande d'engagements (COMEX, juin 2023)	Completed	

Notes : Shaded cells are completed commitments.

[1] Commitment ENG-9 does not apply to the following infrastructure: stockpile infrastructure as well as roads, ditches and basins covered by the decision statement of the Minister of Environment and Climate Change of January 13, 2023. <https://iaac-aeic.gc.ca/050/evaluations/document/146228>

[2] Despite the promoter's commitment to monitor the drinking water supply at the kilometer 381 truck stop, it appears that the operation of this truck stop, including any issues related to drinking water management, is the responsibility of its owner, the SDBJ. The latter holds authorizations issued by the MELCCFP for water management at the kilometer 381 truck stop, for which monitoring and reports are notably sent to the MELCCFP. The promoter will therefore not be able to respect this commitment, having no right or capacity to intervene directly on the water management, or any other element whatsoever, of the kilometer 381 truck stop. The promoter will ensure that it collaborates closely with the SDBJ to ensure the quality/quantity of drinking water at the kilometer 381 truck stop.

[3] According to ECCC's preliminary advice, it is specified that birds should not be scared away, even before the start of the nesting period, since this could lead to a risk of adverse effects on migratory birds and birds at risk. Therefore, the measure was amended while maintaining the objective of the measure, which is to prevent birds from using water management basins.

References

ALLKEM/Galaxy Lithium (Canada) Inc. 2023. Demande de consultation et d'engagements. N/Réf. : 3214-14-055. 28 juin 2023. 4 pages et annexes.

WSP. 2022. Mine de lithium Baie-James. Réponses à la 4e demande d'information reçue du ministère de l'Environnement et de la Lutte contre les Changements climatiques dans le cadre de l'évaluation environnementale du projet (COMEX, 4e série). Rapport produit pour Galaxy Lithium (Canada) INC. 138 pages et annexes.

WSP. 2022. Note technique (COMEX) – Information supplémentaire à la suite des réponses à la 4e série de questions et commentaires. Projet mine de lithium Baie-James. 24 mai 2022. 6 pages et annexes.

WSP. 2022. Note technique (COMEX) – Solution de rechange pour la construction des routes. Projet mine de lithium Baie-James. 7 mars 2022. 7 pages et annexes.