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Baffinland Iron Mines Corporation

STAKEHOLDER ENGAGEMENT PLAN

BAF-PH1-830-P16-0025

Rev 1

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EXECUTIVE SUMMARY

Baffinland’s Stakeholder Engagement Plan (SEP) establishes the approach, strategy and means by which Baffinland Iron Mines Corporation (Baffinland) communicates with Mary River Project (the Project) stakeholders. It draws on the knowledge gained from past consultation and engagement practices, and focuses on maintaining and improving existing stakeholder relationships. Engagement was of particular importance during the planning and construction phase of the Project, as relationships were developed and solidified. As the Project moves forward into operations, the SEP will be refined and updated to provide relevant engagement guidance specific to subsequent phases of the Project.

The North Baffin communities adjacent to the Project are Arctic Bay, Clyde River, Hall Beach, Igloodik and Pond Inlet. These communities comprise the Project’s social zone of influence and were selected based on existing and historical socio-economic and/or eco-systemic ties to the Project area, and their geographic proximity to the Project. The communities of Cape Dorset and Kimmirut have an interest in specific aspects of the Project due to their proximity to the shipping lane.

The SEP provides guidance on communicating effectively with Inuit and other stakeholders. It describes the types of materials that may be used to support that engagement and defines the objectives, the approach and the types of engagement activities that may be employed. It also describes who is responsible for implementing, monitoring and reporting on the engagement programs.

The Grievance Mechanism is also presented, detailing the process by which Baffinland deals with stakeholder complaints about the Project externally and, to some extent, internally. This process defines the procedure for recording, screening, resolving, monitoring, reporting, record keeping and archiving all activities associated with the complaints process.

The SEP presents specific commitments to organize and systematically implement the concepts presented in the plan, commitments for consultation and engagement with a variety of stakeholders, and commitments to engage employees in the development of the Mary River Project.

Early Revenue Phase

On January 13, 2013, Baffinland informed the Nunavut Impact Review Board (NIRB) that, due to various business drivers, Baffinland was proposing to make changes to the schedule and specific activities in the initial stages of the development associated with the Mary River Project (File No. 08MN053). Baffinland noted it understood that this Project amendment request would potentially necessitate a reconsideration of the Terms and Conditions contained within Project Certificate No. 005 as issued by the NIRB on December 28, 2012 for the Mary River Project.

The proposed changes to the schedule and specific activities, defined as the Early Revenue Phase (ERP), consists of the reintroduction of shipment of up to 3.5 Mtpa ore via Milne Port, road transport of iron ore from the Mine Site to Milne Port via the Tote Road, and the deferral of the full scale development of the Approved Project (18 Mtpa production, with railway link to Steensby Port and the development of

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Steensby Port). Pursuant to the NIRB’s instruction to Baffinland (February 2013) regarding the “Next Steps for the NIRB’s Reconsideration of Terms and Conditions Within Project Certificate No. 005 for Baffinland’s Mary River Project”, the Company prepared an addendum to the Final Environmental Impact Statement (FEIS) for the ERP components of the Mary River Project.

An Addendum to the FEIS formed part of the environmental assessment process established for a project under the Nunavut Land Claims Agreement. Under this environmental assessment process, the proponent of a project, such as the Mary River Project, describes the surrounding environment and the proposed development. Potential effects are then predicted and mitigation plans are developed. The severity or “significance” of residual effects (effects remaining after mitigation measures have been applied), are evaluated based on established criteria and expert opinion.

The FEIS Addendum for the Early Revenue Phase (ERP) components of the Mary River project builds on the extensive/baselines studies and assessments carried out since 2011 for the larger Approved Project and is thus closely linked to the FEIS submitted for review in February 2012.

Following the filing of the FEIS Addendum for the Early Revenue Phase (ERP), Baffinland Senior Management undertook an extensive period of mandated stakeholder engagement with all of the relevant regulatory bodies, federal and territorial governments, and other stakeholders, in particular the neighboring communities as defined in section 2.1 of this document, so as to comply with the Nunavut Impact and Review Board’s (NIRB’S) objectives to, *“...protect and promote the existing and future well-being of the residents and communities of the Nunavut Settlement Area, and to protect the eco-systemic integrity of the Nunavut Settlement Area.”*

On September 6 2013, Baffinland signed an Inuit Impact and Benefit Agreement with the Qikiqtani Inuit Association (QIA). The IIBA is mandated under Article 26 of the Nunavut Land Claims Agreement (NLCA) of 1993 and is required between companies proposing to develop or extract resources from any land in the Nunavut settlement Area that may positively or negatively impact Inuit. The IIBA includes a number of commitments related to maximizing Inuit participation in the project through employment; education; training and contracting opportunities. The IIBA is being implemented under the guidance of a Management Committee and Executive Committee with members from both Baffinland and the QIA. The IIBA, a historic signing solidifying the development partnership between the Company and the Land Owners, is central to stakeholder engagement, and Baffinland’s continued relationship with the North Baffin beneficiaries.

On January 27- 29, 2014, the Nunavut Impact Review Board (NIRB) held a Public Hearing in Pond Inlet on Baffin Island in respect of the NIRB’s Reconsideration of the Mary River Project Certificate [No. 005] pursuant to Section 12.8.2 of the Nunavut Land Claims Agreement. This Hearing involved Technical Presentations which assessed the potential eco-systemic and socio-economic impacts of the Early Revenue Phase proposal. From January 29-31, a Community Roundtable was held to allow local

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stakeholders to voice their opinions and or concerns regarding the Early Revenue Phase or to ask questions. This Public Hearing was guided by the NIRB Rules of Procedure.

On March 17, 2014, the Nunavut Impact Review Board released to the Federal Aboriginal Affairs and Northern Development Minister, the 259 page Public Hearing Report, which summarizes the NIRB's conclusions and recommendations arising from their assessment and reconsideration of Baffinland's Early Revenue Phase Proposal. The NIRB concluded that the ERP Proposal may proceed, and recommended that the federal government support this, provided that the project complies with a number of recommended revised and additional Terms and Conditions of Project Certificate No.: 005 as outlined in the Report.

The Amended Project Certificate No. 005 was issued on May 28, 2014.

Recently, in October 2014, Baffinland submitted a Phase II Project Description to the Nunavut Impact Review Board (NIRB) and the Nunavut Planning Commission (NPC). In Spring 2015, the Minister of Aboriginal Affairs provided an exemption to the North Baffin Regional Land Use Plan and recommended that the NIRB proceed with an Environmental Assessment review of the proposed Phase II. Baffinland has received updated and approved guidelines to write an EIS and has indicated to NIRB that an EIS will be submitted in 2016.

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1 INTRODUCTION

Active stakeholder engagement has been a priority of Baffinland since the company's inception. The Stakeholder Engagement Plan (SEP) reflects Baffinland's commitment to stakeholder engagement, and outlines its approach to consultation and disclosure. During construction and into operations, the focus of engagement is on maintaining and improving existing stakeholder relationships. The SEP is a living document and will thus evolve accordingly.

1.1 OVERVIEW AND OBJECTIVES

Stakeholder engagement is a means of maintaining community partnership and helping to ensure that local communities are informed about the Project. The Stakeholder Engagement Plan (SEP) emphasizes the importance of informing stakeholders and highlights the need for effective communication. It encompasses a range of activities spanning the life of the Project, and is strongly dependent on meaningful multi-directional communication.

Building local confidence and strong relationships with communities will enhance Baffinland's reputation in the communities and with all stakeholders. The SEP is intended to outline a systematic program for effective communications. It is a best practice standard and a cornerstone of corporate responsibility. It is about listening, learning, and responding to community concerns.

Stakeholder engagement is aimed at the consideration of meaningful stakeholder input into Project issues and decision making. The objectives of this SEP are to:

- Provide up-to-date information about the Project to the public, applicable regulatory agencies, and particularly to residents of communities which are located closest to the Project.
- Ensure that parties have the opportunity to understand and meaningfully engage in the processes initiated by the project.
- Improve internal decision making processes.
- Reduce the potential for disputes through improved understanding and awareness.
- Reduce business and reputation risks.
- Build buy-in, trust, and ownership of findings.
- Share information regarding project activities.
- Obtain local and traditional knowledge that may affect business.
- Facilitate consideration of alternatives, mitigation measures, and trade-offs.
- Focus priorities so that potential adverse impacts are mitigated and project benefits are enhanced; and

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- Bring in additional knowledge and expertise from potential partners (e.g. communities, academic researchers, government agencies).

Engagement lays the groundwork for long-term and harmonious relationships with the people who affect, or are affected by, the Project.

1.2 STAKEHOLDER ENGAGEMENT PRINCIPLES

As a member of the Mining Association of Canada (MAC), Baffinland is committed to MAC's "Towards Sustainable Mining" Guiding Principles (MAC, 2004). These Principles set the standard for Canadian mining companies to operate in a manner which respects the needs and values of affected individuals and parties. Subscribing to these Principles commits Baffinland to carry out the Project with respect, transparency and with meaningful stakeholder participation.

Baffinland is a member of the NWT & Nunavut Chamber of Mines, with Senior Management sitting as one of the Nunavut chamber's Directors. The chamber's goals are: to realise a vibrant and sustainable exploration and mining industry in the NWT and Nunavut which has the support of the peoples of the North, to be the leading advocate for responsible and sustainable mineral exploration and development in the NWT and Nunavut and to promote the industry and the north to northerners, Canadians, and the world at large.

Baffinland is also a member of the Northern Mine Safety Forum (NMSF), which is a group of individuals and companies involved in mineral exploration and development in Northern Canada, who collaborate with the objective of collectively improving health, safety and environment (HSE) through sharing experience, learning's and expertise.

For Baffinland, stakeholders include the individuals and groups who have, or believe they have, an interest in Baffinland's operations that may affect them. This includes: Inuit and non- Inuit employees, contractors, local people and communities of the area, mining community members, suppliers, customers, environmental organizations, government and regulatory agencies, the financial community, and shareholders.

1.3 REGULATORY REQUIREMENTS OF ARCELORMITTAL

Baffinland is owned 46% by ArcelorMittal and 54% by Iron Ore Holdings LP, with ArcelorMittal as the Project operator. Baffinland is committed to demonstrating responsible business practices. The Company has developed a Community Engagement Standard that adheres to (in addition to the stakeholder engagement principles listed in 1.2) ArcelorMittal's minimum requirements when dealing with stakeholders.

Following this procedure, this includes:

- Complying with all applicable local laws and regulations on stakeholder engagement.

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- Developing a stakeholder engagement plan after an understanding and mapping of all the stakeholder categories and their issues including vulnerable communities .
- Disseminating information on company activities in language and format that are appropriate and accessible.
- Establishing a grievance procedure that allows stakeholders a means to raise their issues and concerns and to have those issues and concerns addressed.
- Monitoring and reporting stakeholder engagement activities to local stakeholders as well as Baffinland’s corporate office.

In addition, Baffinland adheres to the following ArcelorMittal policies :

Code of Business Conduct, Anti-Corruption Guidelines, Economic Sanctions, Anti-trust regulations, Human Rights Policy, Insider Regulations, Data Protection

Baffinland also adheres to the following Baffinland Policies (relevant to stakeholder engagement):

Sustainable Development Policy, Health, Safety and Environment Policy, Site Access Policy, Public Relations and Communications, Donations and Sponsorship Policy, Inuktitut in the Workplace Policy, Family Emergency Policy, Hunting and Fishing (Harvesting) Policy - on or Near Baffinland Leased, Employee Concerns Policy

1.4 UNDERSTANDING THE TERMS

The following key terms are used throughout this document. These definitions are consistent with those outlined by relevant leading industry standards (such as MAC) and other relevant guidelines and documents as defined in sections 1.2 and 1.3. Also included in this section are definitions of some of the key terms regarding the area in which the Mary River Project is located.

Public Consultation

Public consultation is a vehicle for facilitating two way communications for the Project. It provides an avenue for the residents of neighbouring communities to the Project, organizations, government institutions, Project lenders, and Baffinland to improve their decision-making process while fostering a culture of understanding and participation. Consulting with stakeholders involves dialogue with those persons or groups who have the ability to influence the Project’s outcome. The development of the Mary River Project is consistent with the Nunavut Planning Commission’s broad planning principles, policies and goals, as well as the Nunavut Exploration and Mining Strategy. Baffinland Iron Mines is committed to preserving the environment, enriching the communities around the Mary River Project, and caring for the

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health and well-being of its employees, contractors, and people in neighbouring communities and recognises that this can only be facilitated through transparency and public consultation.

Nunavut Land Claims Agreement

The Nunavut Land Claims Agreement is the largest Aboriginal land claim settlement in Canadian history. When the Agreement was signed, legislation was also passed leading to the creation of a new territory called Nunavut on April 1, 1999. The Nunavut Land Claims Agreement gives title to Inuit-owned lands measuring about 350,000 square kilometres (of the total area of Nunavut of 1.9 million square kilometres), of which about 35,000 square kilometres include mineral rights.

IIBA (Inuit Impact and Benefits Agreement)

Article 26 of the Nunavut Land Claims Agreement requires that an Inuit impact and benefit agreement (IIBA) be finalized before a Major Development Project may commence, in order to ensure any project that could have a detrimental impact on Inuit or that could reasonably confer a benefit on Inuit, is taken into account. The IIBA must be negotiated and agreed upon between Inuit and the developer, and must be approved by the Minister of Aboriginal Affairs and Northern Development. While the benefits shall be proportional to the nature, scale, impact of the project, they shall contribute to achieving an equal standard of living and working in the NSA to other Inuit and to Canadians in general.

Qikiqtani Inuit Association (QIA)

The Qikiqtani Inuit Association (QIA) is aimed at representing the interests of the Inuit of the Baffin Region, High Arctic and Belcher Islands in a fair and democratic way. QIA was formed as a non-profit land claim and community organization in 1996 and registered as a society in 1997. Its predecessor, Baffin Regional Inuit Association (BRIA), was formed in 1975 and registered as a society in 1977.

QIA is one of the three Inuit organizations affiliated with the Nunavut Tunngavik Incorporated (NTI). The Board of Directors of NTI is drawn from three Regional Inuit Associations accountable to Inuit Beneficiaries. QIA does not take the roles of the federal or territorial government, but works with them and other partners to ensure that Inuit are being adequately served by these governments.

Qikiqtani Region

The Qikiqtani Region (Inuktitut: ᐅᐅᐅᐅᐅᐅᐅ) or Baffin Region is an administrative region of Nunavut, Canada. Mary River is located in the Qikiqtani Region of Nunavut. One can also say May River is located in the North Baffin Region.

Environmental Impact Assessment

An environmental impact assessment is an assessment of the possible positive or negative impact that a proposed project may have on the environment, together consisting of the natural, social and economic

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aspects. It is a scientific process which, in Canada, is legislated. In the case of the Mary River Project, the Nunavut Impact Review Board issued guidelines for the preparation of an Environmental Impact Statement (“EIS”) as required under Article 12 of the NLCA (Nunavut Land Claims Agreement).

Disclosure

Effective consultation includes culturally appropriate disclosure of information to stakeholders in a timely and on-going fashion. Information disclosure is critical if stakeholders are to have meaningful input and participation in the decision-making process. The approach thus assumes that participation will enable stakeholders to identify their diverse objectives, flag problems and conflicts, and contribute to their resolution.

Potentially Affected Communities

The Nunavut Impact Review Board (NIRB) identifies Potentially Affected Communities within the regulatory process as communities that are expected to be eco-systematically or socio-economically influenced by the project, that is, “*where Inuit land use and occupancy (past, present and future) should be considered*” as well as to “*the extent to which traditional land use and Inuit harvesting could potentially be affected by the Project*” (NIRB, Nov 2009).

Stakeholder Engagement

The term “stakeholder engagement” is emerging as a means of describing a broader, more inclusive, and continuous process between a company and those potentially impacted that encompasses a range of activities and approaches and spans the entire life of a project. The growing use of this term reflects broader changes in the business and financial worlds, which increasingly recognize the business and reputational risks that come from poor stakeholder relations, and place a greater emphasis on corporate social responsibility, transparency and reporting.

Companies such as Baffinland Iron Mines engage in stakeholder engagement to... “*better understand its impacts, to help articulate its values, mission, strategy, commitments and implementation, to facilitate a regulatory approvals process, to participate in measurement and reporting, to avert or solve a crisis, or to proactively improve relationships. The reason for engaging stakeholders determines the style of engagement and stakeholders' expectations, all of which could change over time.*” (Government of Canada, Industry Canada, Stakeholder Engagement March, 5, 2012)

Engagement Levels

Baffinland recognises four distinct levels of stakeholder engagement as portrayed in FIGURE 1-1

- Information: One-way flow from the Company to stakeholders
- Consultation: The opportunity for two-way exchange of information

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- **Participation:** Active, multi-directional interaction and more intensive forms of consultation
- **Negotiation:** Face-to-face discussions with the intent of reaching agreement on a specific issue

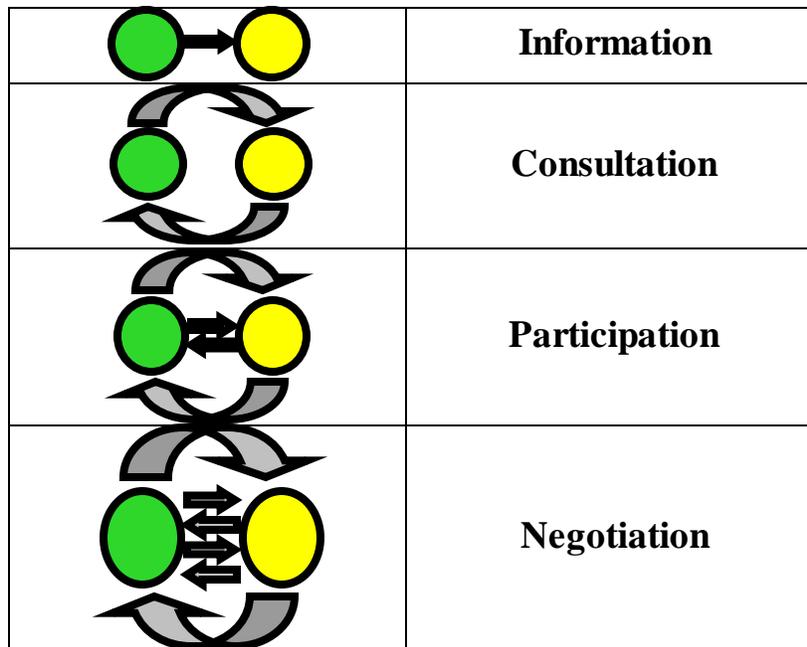


FIGURE 1-1: STAKEHOLDER ENGAGEMENT LEVELS

While these levels are identified in the International Finance Commission’s handbook on stakeholder engagement, the definitions listed above were created specifically for this SEP.

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2 APPROACH TO STAKEHOLDER ENGAGEMENT

To achieve the objectives of the Stakeholder Engagement Plan, Baffinland has established a program that includes a range of activities, including disclosure of materials, meetings, workshops, and other venues with local communities, local, regional and national governments, as well as other stakeholders including non-government organizations (NGOs). Media interactions and Territorial level round-table exercises have also been conducted and are on-going.

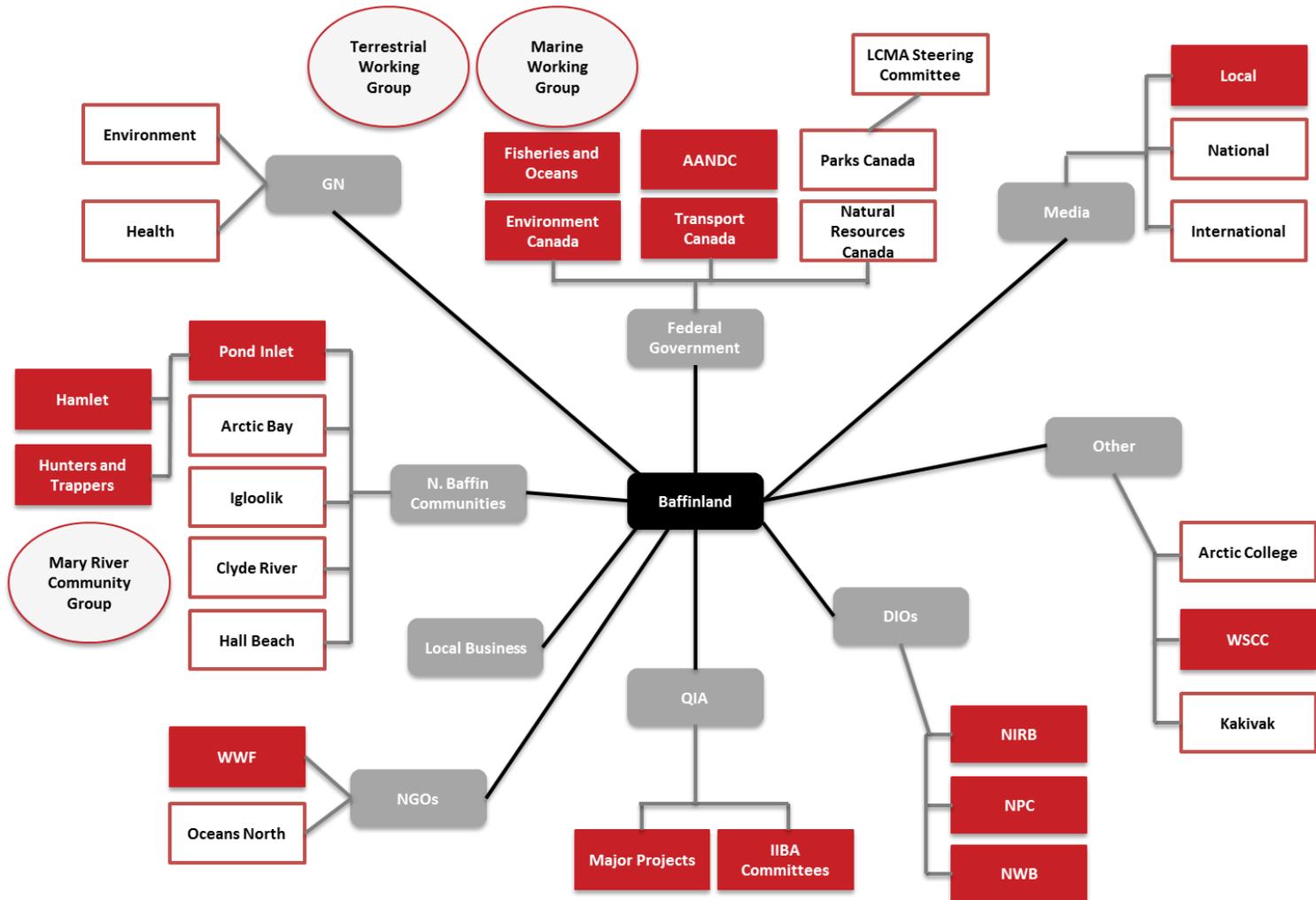
Stakeholder engagement will largely be driven by the commitments made under the newly signed IIBA and other permits and agreements in place such as NIRB Project Certificate No. 005. Baffinland, the communities, and the regulatory bodies involved, have invested a significant amount of time and effort into these processes and as such, these permits and licenses will continue to guide our engagement endeavours, as is mandated therein.

The objectives of the SEP are presented in Section 1.1. In order to achieve these objectives and facilitate meaningful consultation and community engagement, Baffinland used the following approach:

- Formally identify and analyse stakeholders (Section 2.0)
- Involve appropriate stakeholders in “scoping” the EIS;
- Disclose stakeholder concerns regarding environmental, cultural, social, and health impacts
- Use engagement as a means to identify other potential impacts and to enhance mitigation planning
- Employ Baffinland Community Liaison Officers (BCLOs) to inform and facilitate access to and for local people
- Maintain involvement with government-led consultation
- Ensure stakeholder information access across project planning
- Report to stakeholders on evolving project design, plans and schedule
- Document stakeholder engagement activities and results; and

Balancing multiple considerations and concerns is an important component of stakeholder engagement. Some of the various considerations the Mary River Project must balance are presented graphically below (these are standard and similar to many other projects):

FIGURE 2-1: CONSIDERATIONS FOR STAKEHOLDER ENGAGEMENT PLAN



2.1 STUDY AREA AND SOCIAL ZONE OF INFLUENCE

The Nunavut Impact Review Board (NIRB) identifies two general categories to determine which communities could potentially be affected by a Project Proposal and should therefore be consulted. They include but are not limited to:

1. Eco-systemic boundaries; and
2. Socio-economic influenced areas.

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“Potentially Affected Communities” are expected to be eco-systematically or socio-economically influenced by the Project. They represent the communities *“where Inuit land use and occupancy (past, present and future) should be considered” as well as to “the extent to which traditional land use and Inuit harvesting could potentially be affected by the Project” (NIRB, Nov 2009).*

In this context, Baffinland views the communities of Baffin Island in three categories:

- **Category 1:** Communities in the immediate vicinity of the Project, which have existing and historical socio-economic and/or eco-systemic ties to the Project area, and for which the Project has a direct impact on the traditional land use of their residents. These are the communities of Pond Inlet, Arctic Bay, Igloolik, Hall Beach and Clyde River.
- **Category 2:** Communities with a potential interest in the Project due to their location along the shipping lanes, and therefore have a biophysical tie to the Project. These are the communities of Cape Dorset and Kimmirut.
- **Category 3:** The community of Iqaluit which will be impacted due to its commercial and institutional importance in Nunavut.

Public consultation has principally focused on the Category 1 communities and to a lesser extent on all communities. Socio-economic studies have focused on Category 1 communities since these communities were expected to be most affected socio-economically. The ties of the individual communities to the Project are described in more detail below:

2.1.1 CATEGORY 1 COMMUNITIES

- **Pond Inlet** is geographically the closest community to the Mary River mine site, located approximately 160 km northeast of Mary River. Pond Inlet relies on hunting in the marine environment of Eclipse Sound and Milne Inlet as well as caribou hunting through the Mary River area. As such, it has the closest land use, historical and eco-systemic ties to the Mary River area.
- **Igloolik** is located on the mainland but is the closest community to the proposed Steensby port site (155 km) and second closest geographically to the Mary River Site (230 km). Historically, Igloolikmiut spent the summer hunting caribou along the western side of North and Central Baffin Island. Current harvest patterns show that while Igloolikmiut utilize the Baffin coast and marine areas at the mouth of Steensby Inlet, their activities are heavily concentrated around the community on Melville Peninsula and the closest Baffin Island shoreline to the north. Igloolikmiut still hunt around Rowley and Koch Islands and even in Steensby Inlet; thus, the Project shipping route through this area may have both land use and eco-systemic effects on the community.
- **Hall Beach** is located on the mainland just south of Igloolik, some 192 km from the proposed Steensby port site and 288 km southwest of the Mary River site. Hall Beach harvest patterns are distinct from Igloolik despite their proximity, with a concentration of marine harvesting centred on the Hall Beach area. Some hunting occurs on Baffin Island intermixed with Igloolikmiut hunting, including in and

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around Rowley and Koch Islands and Steensby Inlet; thus, the Project shipping route through this area may have both land use and eco-systemic effects on the community.

- **Arctic Bay** is located on northern Baffin Island, some 280 km northwest of the Mary River site. Harvest and land use patterns indicate that the effect of Project activities on these current patterns of Arctic Bay residents is less than what it would have been historically. Arctic Bay residents may use the Milne Inlet, Eclipse Sound and Mary River areas for hunting on a sporadic or occasional basis but other geographic areas are more important to this community's land use.
- **Clyde River** is located in north eastern Baffin Island some 415 km from the Project area. Historical land use information and discussions with elders from various communities suggest that the people of the Clyde River area used to travel inland from Cambridge Fiord facing Baffin Bay, into the Ravn River area east of Angajurjualuk Lake and southeast of Mary River. Harvest patterns suggest that contemporary land use activities are now concentrated closer to the community, however, historical ties to the Mary River area have resulted in the inclusion of this community in the study area.

2.1.2 CATEGORY 2 COMMUNITIES

- **Cape Dorset and Kimmirut.** The communities of Kimmirut and Cape Dorset are located on South Baffin Island (Category 2). While Project ships may pass near to the communities through Hudson Strait, recent harvest data for Cape Dorset and Kimmirut suggest that hunting activities are very concentrated along the coast but do not extend far into Hudson Strait. This is because the ice is mainly first year ice in restricted motion; as such, harvesting activities are physically restricted to the near shore of the Strait because of dangerous ice conditions. Category 2 Communities are not affected at all by the Early Revenue Phase as no shipping will occur in Fox Basin.

2.1.3 CATEGORY 3 COMMUNITY

- **Iqaluit** is both geographically and eco-systemically well removed from the Project area, but is inherently tied to the Project in a socio-economic sense. This is due to the presence of government/regulatory agencies with whom the Project must interact. The Company is expecting that some mine employees who were originally based in other Baffin communities may opt to move to Iqaluit due to its amenities and relative lower cost of living.

Since 2007, Baffinland Iron Mines has established Community Liaison Officers (BCLOs) in each of the five North Baffin communities. Starting with Igloolik and Pond Inlet, offices were opened to help facilitate the Company's presence in the five North Baffin Communities. Over the years Baffinland has also added offices in Clyde River, Hall Beach, Arctic Bay and a Head Office in Iqaluit. The combination of having BCLOs and offices in each community has brought success to Baffinland's employment initiatives.

2.2 STAKEHOLDER IDENTIFICATION, ANALYSIS AND TRACKING

2.2.1 IDENTIFICATION PROCESS

Stakeholder identification for the Project was originally initiated during work on environmental and socio-economic baseline studies in 2004, and has been revised and updated in subsequent years. Stakeholder

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identification and initial consultation was achieved by conducting government, institutional and household interviews, carrying out surveys, reviewing statistical data, and hosting community focus group discussions. Specifically, stakeholders were identified through the following means:

- Past engagement activities on the project, including pre-consultation activities and permitting of the current project activities;
- Development of inventories of community-based organizations by Baffinland Liaison Officers in North Baffin communities; and
- Ongoing engagement through current project activities.

TABLE 2-1 lists Project stakeholders, grouped according by level of government, type, or organization. This list has formed the basis for analyzing and prioritizing stakeholders to determine who the Project will engage with, track, and monitor.

TABLE 2-1: PROJECT STAKEHOLDER/ORGANIZATION

| FEDERAL AGENCIES | |
|---|---|
| Aboriginal Affairs and Northern Development Canada | Health Canada |
| Canadian Coast Guard | Parks Canada (Steering Committee for the proposed LMCA) |
| Department of Fisheries and Oceans | Natural Resources Canada |
| Environment Canada (Canadian Wildlife Service, Water Survey of Canada, Canadian Ice Services, Canadian Hydrographic Services) | Transport Canada |
| TERRITORIAL GOVERNMENT AGENCIES | |
| Department of Community and Government Services | Department of Executive and Intergovernmental Affairs |
| Department of Culture, Language, Elders and Youth | Department of Finance |
| Department of Economic Development & Transportation | Department of Health and Social Services |
| Department of Education | Nunavut Research Institute |
| Department of Justice | Workers Safety and Compensation Commission |
| Department of Environment | |
| INSTITUTES OF PUBLIC GOVERNMENT | |
| Nunavut Impact Review Board | Nunavut Water Board |
| Nunavut Planning Commission | Nunavut Wildlife Management Board |
| INUIT ORGANIZATIONS | |
| Inuit Heritage Trust Incorporated | Qarjuq Elders Committee (Pond Inlet) |
| Inullariit Elders Society | Qikiqtani Inuit Association |
| Qikiqtaaluk Corporation | Kakivak Association |
| Nunavut Tunngavik Inc. | |
| COMMUNITY ORGANIZATIONS | |
| Arctic Bay HTA – Ikajutit | Hamlet of Pond Inlet |

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|---|---|
| Clyde River HTA – Namautaq | Hamlet of Pond Inlet Economic Development Committee |
| Hall Beach HTA | Igloolik HTA |
| Hamlet (Municipality) of Igloolik | Mittimatalik Hunters and Trappers Organization |
| Hamlet of Arctic Bay | Hamlet of Arctic Bay Economic Development Committee |
| Ilisaqsiq Society (Clyde River) | |
| WORKING GROUPS | |
| Qikiqtaaluk Socio-Economic Monitoring Committee | Marine Environment Working Group |
| Terrestrial Environment Working Group | Mary River Community Group |

2.2.2 ONGOING ANALYSIS AND TRACKING

As the Mary River Project developed through the Permitting stage, Baffinland transitioned to a more formalized document control system. Baffinland recorded the meetings with stakeholders at the local and territorial levels by formatting the information into mandatory consultation documents. These were then uploaded to a platform, dated and archived and subsequently interlinked and cross referenced as to relevant topics and issues in unique software which was developed specifically for the Mary River Project.

Data entry has included the uploading of historical documentation, where available, including: contacts, meetings, meeting reports, discussed commitments, refused commitments and agreed upon commitments, media related to the Mary River Project, Baffinland and surrounding topics into a software known as Contact Manager.

TABLE 2-2: CONSULTATION RECORD FIELDS

| Category | Description |
|--------------------------|---|
| Date | |
| Communication type | Type of interaction (face-to-face meeting, teleconference, etc.) |
| Stakeholder/organization | The name of the individual(s) and role/position(s) |
| Objectives | Objectives of the meeting |
| Key issues | Describe main issues (e.g., want employment, concerned about social or environmental impacts) |
| Summary | Summary of the discussion |
| Follow-up | If follow-up is required or complete, follow-up date (if applicable), and follow-up details |
| Notes | Detailed notes on the discussion and outcomes |

Baffin also conducted a major IQ "Inuit Qaujimagatuqangit" or "Inuit traditional knowledge" study (the largest of its kind) for the original Final Environmental Impact Assessment. All of the data from that study is currently being repatriated back to the communities once Baffinland finds suitable storage space for the material.

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In addition, Baffinland produces Annual Reports for the Nunavut Water Board, the Qikiqtani Inuit Association (QIA) (for the Commercial Lease and the Annual IIBA Forum Report) and the Nunavut Impact and Review Board (NIRB). There reports are available on the public record.

2.2.3 IIBA COMMITMENT TRACKING

All IIBA articles and commitments are currently being manually captured. Each commitment has been assigned a process, deliverable, responsible person and action date. Regular quarterly reviews with the responsible parties track and capture implementation progress and quarterly reports are filed with the QIA. As a consolidated system for all agreements, permitting and licensing requirements becomes available, tracking may be moved over to this system.

TABLE 2-3: PROVIDES A SAMPLE OF CURRENT IIBA TRACKING

| Article No. | Commitment | Process/Strategy | Deliverables | Responsible Party | Inputs Required | Timeline | Priority | Status |
|-----------------------------|--|------------------|--------------|-------------------|-----------------|----------|----------|--------|
| ARTICLE 7-EMPLOYMENT | | | | | | | | |
| 7.1 Objectives | | | | | | | | |
| 7.1.1 | Whenever possible the Company will hire Inuit into all levels of employment, from entry-level positions to senior management. | | | | | | | |
| 7.1.2 | The Company will work with QIA, the Executive Committee and the Inuit Employment and Training Coordinator to integrate Inuit employees with employment opportunities. | | | | | | | |
| 7.1.3 | In the instance of a temporary closure or reduction in the workforce, Inuit employees will be the last to be laid off from any specific job category, with the stipulation that individual employees' skill levels must meet or exceed job requirements. | | | | | | | |

2.3 CULTURAL SENSITIVITY

In the most general sense, the “public” are primarily Inuit residents of the communities located closest to the Project: Pond Inlet, Igloodik, Arctic Bay, Clyde River and Hall Beach (Category 1 communities). While non-Inuit community members are considered stakeholders as well, Inuit culture creates an additional set of needs to be considered during stakeholder engagement. In order to achieve meaningful consultation with Inuit communities, Baffinland has endeavoured to ensure that the communities understand the messages communicated within the process of dialogue. To this end, the following cultural sensitivities have continuously been considered:

- Attention must be paid to scheduling engagement initiatives. There are certain times of the year that the community feels are less appropriate for the Company to schedule meetings or other activities. Seasonal use of the land and the spending of time with family take priority in the spring, in the summer when the ice has broken up, and during the holiday season. The Company avoids holding meetings, as much as feasible and reasonable, at these times.
- Inuit Qaujimagatuqangit (traditional knowledge, beliefs and values) should be respected at all times and incorporated, where applicable, into project design.
- Conflict is to be avoided; the desire to avoid conflict, especially with the older generations, may mean that some members of the community may be hesitant to bring up issues which are potentially contentious. It has always been important for Baffinland and its representatives to specifically encourage the older generations to share both positive and negative comments and opinions.

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- Relationships are extremely important to Inuit, as well as honesty and the maintenance of social harmony. The Company considers all levels of engagement as contributing to a long-term and meaningful relationship with the communities.
- Listening is a valuable tool in community engagement - silence when a community member is speaking, and allowing the member to finish what they have to say is a form of respect.
- Inuit often use non-verbal means to communicate.
- Thoughtful and correct response to a local person's comment or question is more important than an immediate answer.
- If commitments are made to the community, whether regarding information, action or initiatives, they must be followed up on.

Most community members have little experience with mining development or the processes arising from industrial development. Therefore, all levels and forms of engagement consider that:

- Local people may not be fully aware that they are welcome to participate in the process. Special effort is made to welcome all members of the communities to attend workshops, meetings and other activities.
- Terminology and concepts used in public presentations and reports should be accessible to, and understandable by non-specialists. This includes avoiding the use of acronyms whenever possible.
- Presenters speak slowly, clearly, and in small blocks to ensure that interpreters can keep up and communicate the information accurately.
- Visual images (photographs, posters, videos) are used more often than oral descriptions, especially where people have no previous experience with a concept or topic.
- Oral transmission of information, especially over the local community radio stations, is in many cases, preferable to written information.
- Inuktitut is the first language of most community members. Every attempt is made to have oral information interpreted and written information translated into Inuktitut.

2.3.1 CROSS CULTURAL RECOGNITION

In 2013, Baffinland was pleased to roll out a Cultural Awareness Training Program as part of the new employee orientation that was developed in partnership with Illisaqsivik and Piksuk Media, which is currently still utilized and has been updated.

Baffinland works closely with the site-based Human Resources team, our Inuit employment and Training Coordinator and the Elder On Site positions to develop additional cross-cultural recognition programs to all employees. The objective of these programs will be to enhance positive interaction between Inuit and non-Inuit in the work place.

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2.3.2 INUIT PREPAREDNESS FOR THE WORKPLACE

All employees attend a workplace orientation with the aim to familiarize employees with the mining industry in general, the Project and expectations of all employees working on the project. This orientation is delivered within the first few days of employment on site with Baffinland.

In 2013 and 2014, the Work Ready Program was introduced successfully throughout the N. Baffin communities to prepare Inuit employees for work on site. In the future, an updated Work Ready Program will be delivered.

2.4 BAFFINLAND COMMUNITY LIAISON OFFICERS AND COMMUNITY AUDIENCES

In order to better communicate with Category 1 communities, Baffinland has created the position of Baffinland Community Liaison Officers (BCLOs), who act as the company representative in the directly impacted communities.

Baffinland Community Liaison Officers play a major role in all aspects of stakeholder engagement, and most notably where the stakeholders are members of the particular community, in which the Baffinland Liaison Officer both lives and is employed. BCLOs effectively bridge the cultural gap between the communities and Baffinland and thus provide an important link between their community and Baffinland. Baffinland Community Liaison Officers can often more effectively disseminate information on company operations than an outsider could, and are similarly knowledgeable about community activities that could affect company operations. For example, cultural nuances, important community events and seasonal harvesting activities can be identified by the Baffinland Liaison Officers and planned for accordingly. BCLOs play a crucial role in arranging meetings in local communities, including booking meeting venues, translators, and accommodation. The BCLOs work closely with the HR department in assisting potential applicants to complete necessary documentation.

The ability to relate on a personal level, and in the first language of community stakeholders, helps to create a level of comfort and openness that might not otherwise occur. It is important to note that local stakeholders place a high value on the creation of long-term relationships with the Company and its representatives.

Baffinland maintains Liaison Officers in the Category 1 communities (Arctic Bay, Pond Inlet, Clyde River Igloodik and Hall Beach). All of these positions report to the Senior Northern Manager in Iqaluit.

Baffinland's Community Liaison Officers undertake weekly calls with a member from Baffinland's Human Resources Team (who reports information to the Head of Human Resources). Other members of Baffinland staff, which may include Operations, the IIBA implementation team, or on-site Human Resources personnel, frequently liaise with BCLOs as well. In this way, topics can be discussed confidentially, and either resolved or directed to the appropriate person.

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2.5 LOCALLY SOURCED PROJECT EMPLOYEES

Ensuring Inuit access to job opportunities will support successful Project execution and the Project's commitment to providing meaningful benefits to locals. Hiring practices and proactive training of unskilled, semi-skilled and skilled labor has been identified as a key component of local engagement. Baffinland is therefore committed to using best efforts to maximize local hiring. On-going workforce needs are reviewed and opportunities for local hiring identified regularly. Now governed by the IIBA under Article Seven, whenever possible, Baffinland will hire Inuit into all levels of employment, from entry-level positions to senior management. Baffinland and the QIA will hire Employment and Training Coordinators to support these efforts. Article Seven of the IIBA includes stipulations on qualifications, hiring preferences, language, posting practices, selection and career development. The provisions of this Article apply to the employment practices of Baffinland, its contractors and all subcontractors, regarding the recruitment and employment of Inuit on the Project.

2.6 STAKEHOLDER ENGAGEMENT ACTIVITIES BY PROJECT PHASE

TABLE 2-4 presents the range of stakeholder engagement activities that have been utilized in the various phases of the Project, from conception through feasibility/environmental review, and may be utilized currently in the construction phase and in operations and beyond.

TABLE 2-4: STAKEHOLDER ENGAGEMENT ACTIVITIES BY PROJECT PHASE

| Project Phase | Key Activities |
|---|--|
| Feasibility Study and environmental studies (complete or in-process) | <ul style="list-style-type: none"> • Baffinland Liaison Officers recruited for some of the Communities assisted environmental and social sciences specialists on EIS studies • Interviews with stakeholder representatives and key informants • Participatory techniques used to consult with focus groups on impact-specific topics • Formal meetings • Participatory techniques used to consult with stakeholders most disadvantaged by the project • Stratified sample interviews • Public meetings • Newsletters • Open houses in Baffinland Liaison Officer offices • Radio and TV broadcasts • IIBA negotiation meetings • Workshops |
| Construction and Operations | <ul style="list-style-type: none"> • Participatory monitoring • Grievance mechanisms (various) • Targeted consultation, e.g. on specific stakeholder groups • Internet-based consultation, including access to monitoring data • Stakeholder perception surveys and follow-up • Simplified sample interviews • Newsletters • Radio and TV broadcasts • Open houses in Baffinland Liaison Officer offices • IIBA, Management and Executive Committees • IIBA Annual Community Forum • Specific workshops |
| Consultation on new issues and concerns (ongoing) | <ul style="list-style-type: none"> • Household questionnaires with project-affected people • Interviews with key informants and stakeholder representatives • Stakeholder events and gatherings • IIBA, Management and Executive Committees • IIBA Annual Community Forum |

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3 DISCLOSURE MATERIALS

3.1 GUIDELINES FOR THE PREPARATION OF DISCLOSURE MATERIAL

All stakeholders value truth and transparency. These attributes are critical when dealing with both stakeholders who have no previous knowledge or understanding of the Project or associated processes, as well as for those who are already engaged in the processes. The following guidelines apply for the preparation of disclosure material:

- Understand the different needs and abilities of stakeholder groups to process information, and tailor materials accordingly
- Do not assume that all stakeholders possess an understanding of business practices and protocols
- Be clear and consistent in describing impacts and what the Project can deliver
- Plan ahead and anticipate issues
- Create robust procedures for developing disclosure materials
- Make sure there is a “consistent message” in the materials disclosed
- Get sign-off from managers on key facts and figures
- Do not portray a more favourable situation than actually exists
- Explain uncertainties and their limits (e.g., by describing “most likely,” “best” & “worst case” scenarios)
- Make information meaningful and accessible (culturally appropriate) and use images to assist in descriptions where appropriate
- Release sensitive information in face-to-face meetings only (e.g. IIBA benefits); and
- Provide an avenue for affected people to get more information on topics that interest or concern them.

3.2 TYPES OF MATERIALS

TABLE 3-1 presents the types and uses of engagement materials that Baffinland uses and explains the advantages and disadvantages of their use.

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TABLE 3-1: TYPES OF ENGAGEMENT MATERIAL

| Technique | Description and Use | Advantages | Disadvantages |
|--|---|---|---|
| Level 1 Education & Information Provision | | | |
| Leaflets/Brochures/ Fact Sheets/Tri-Folds | Used to convey information; care should be taken in distribution | Can reach a wide audience or be targeted | Information may not be understood or may be misinterpreted. Most Inuit prefer oral information to written materials |
| Newsletters | May involve a series of publications; care should be taken in distribution | Ongoing contact, flexible format can address changing needs and audiences | Not everyone will read a newsletter |
| Unstaffed Exhibits/Displays | Set up in public areas to convey information | Can be viewed at a convenient time and at leisure; graphics can help visualize proposals | Information may not be understood or may be misinterpreted |
| Newspaper Article | Conveys information about a proposed activity | Potential to reach a larger audience | Unless an activity has gained a national profile, it will be of limited interest |
| Local Radio Announcements | Conveys information about a proposed activity | A locally accepted means of information transfer, with the ability to reach those who are not literate; considered effective in local communities | Local audiences only |
| Site Visits | Provides firsthand experience of an activity and related issues | Issues brought to life through real examples | Difficult to identify a site which replicates all issues; can only bring so many individuals on visits |
| Level 2 Information Feedback | | | |
| Staffed Exhibits/Displays | Set up in public areas to convey information. Staff available. | Can be viewed at a convenient time and at leisure. Graphics can help. | Requires a major commitment of staff time |
| Staffed Telephone Lines | Can phone to obtain information, ask questions or make comments about proposals or issues | Easy for people to participate and provide comments; promotes a feeling of accessibility | May not be as good as face-to-face discussions; staff may not have knowledge to respond to all questions |

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| Technique | Description and Use | Advantages | Disadvantages |
|---|--|---|---|
| Staffed emails such as contact@baffinland.com | External people can email to ask questions or raise concerns | Confidential. Recorded. Everyone is answered. Helps to demonstrate willingness to communicate. | People may use email rather than call or go through appropriate channels. |
| Internet | Used to promote information or invite feedback. | Potential global audience. Convenient method for those with internet access | Not all parties will have access to the internet, but as many do now, materials will need to be managed and kept up to date |
| Public Meetings | Used to exchange information and views | Can meet with other stakeholders. Demonstrates proponent is willing to meet with other interested parties. | Can be complex, unpredictable and intimidating. May be hijacked by groups or individuals. |
| Call-In Radio Shows | Used to exchange information and views in a locally accepted format. | Virtually all members of the community listen to the local radio. Allows for anonymous commentary | Can be complex, unpredictable, misinterpreted, and may be used as a "soapbox" by opponents of the project. |
| Surveys, Interviews and Questionnaires | Used for obtaining information and opinions. May be self-administered, conducted face-to-face, by post or telephone. | Confidential surveys may result in more candid responses and can identify existing knowledge and concern | Response rate can be poor; responses may not be representative and opinions change. |
| Level 3 Involvement and Consultation | | | |
| Workshops | Used to provide background information, discuss issues in detail and solve problems | Provides an open exchange of ideas. Can deal with complex issues and consider issues in depth and can be targeted | Only a small number of individuals can participate; full range of interests not represented |
| Open House | Locations provided, e.g., at a site or operational building for people to visit, learn about a proposal and provide feedback | Can be visited at a convenient time and at leisure | Preparation for and staffing of the open house may require considerable time and money |

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| Technique | Description and Use | Advantages | Disadvantages |
|--|--|--|--|
| Level 4 Extended Involvement | | | |
| Community Advisory/Liaison Groups | People representing particular interests or areas of expertise, e.g., community leaders, meet to discuss issues. | Can consider issues in detail and highlight the decision-making process and the complexities involved. | Not all interests may be represented. Requires ongoing commitment from participants. |
| Visioning | Used to develop a shared vision of the future. | Develops a common view of future needs. | Lack of control over the outcome. Needs to be used early in the decision-making process. |
| IIBA | Annual Report | Informs public of activities of IIBA | All reporting may not be positive |
| Source: <i>Institute of Environmental Management and Assessment (1999)</i> | | | |

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4 ENGAGEMENT PHASES

Stakeholder engagement for the Mary River Project consists of four main phases:

- Pre-consultation (2004 to 2009) (completed)
- Formal consultation during the environmental review process, including Early Revenue Phase (2009 to 2012) (completed) –to be reopened as required
- Consultation during Project development (2nd quarter 2013 to 2016) (ongoing)
- Consultation during Project operations (2016 and beyond) (ongoing)
- Future consultation on Phase II and future permitting (on as needed basis)

Baffinland has a commitment to keep communities informed through every phase of the Mary River Project. It is in the best interest for the Company and for the neighbouring communities for there to exist a consistent two way flow of information.

Activities for each of these phases are described below.

4.1 OBJECTIVES OF THE ENGAGEMENT PROGRAM TO DATE

Engagement provides for active involvement of stakeholders in the development of the Project, through regular collaboration with Project teams. To date, the focus of stakeholder engagement has been to:

- Identify and monitor key stakeholders and their interests and concerns
- Identify patterns of interaction and utilize appropriate methods and tools to engage stakeholders, particularly local North Baffin communities
- Allow for meaningful stakeholder input into final Project decision-making
- Build long-term relationships between Baffinland and the local communities
- Develop practical and locally acceptable mitigation strategies for unavoidable impacts (and maximize benefits), which includes the collection of IQ knowledge which was beneficial to program design
- Give stakeholders access to information on Baffinland activities in a timely manner
- Provide information that can be understood by everyone (written and spoken Inuktitut and English)
- Provide information on the Project, the company, or other relevant topics at locations which are accessible to all who want the information
- Include women and vulnerable groups in the engagement process
- Manage expectations among communities and other stakeholders

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- Establish clear mechanisms for managing stakeholders’ questions, concerns, and complaints/grievances and provide appropriate conflict resolution processes; and
- Document formal engagement activities, maintain a relevant database and implement a records management system.

4.2 SUMMARY OF CONSULTATION TO DATE

4.2.1 COMMUNITY CONSULTATION

This initial consultation focused on obtaining and disseminating information regarding exploration efforts (2004 and 2005), and later regarding bulk sampling plans (2006). Efforts were broadened in scope and outreach in 2007 to include all five communities expected to be directly affected by Project when Baffinland undertook its first formal public consultation on the mine development plans. The purpose of these consultations was to inform stakeholders and solicit public input. During this time meetings with community organizations—including Mayor and Council and Hunter and Trapper Associations/Organizations also took place.

A second round of public meetings was held in the same communities in late March 2008 following submission of Baffinland’s Development Proposal (Baffinland, 2008) to regulatory agencies. The objective of these meetings was to:

- Hold dialogue with the communities
- Provide them with information regarding the Project Development Proposal
- Identify any issues or concerns that might be associated with planned Project activities; and
- Integrate appropriate stakeholder feedback in Project decision-making.

In April 2009, Baffinland attended NIRB scoping sessions in the potentially affected communities. Through 2010, Baffinland visited potentially affected communities (including Cape Dorset and Kimmirut) on several occasions in order to provide Project updates and to discuss preliminary findings of the draft environmental impact statement (DEIS). Baffinland carried out two rounds of open houses in the Category 1 and 2 communities in 2011, and held numerous other meetings with communities in northern Foxe Basin regarding port location alternatives.

PowerPoint presentations used in public meetings were in Inuktitut. Presentations delivered in English were translated simultaneously using local translators as much as possible to preserve local dialects. As much as possible, Baffinland had at least two translators on hand at all meetings with community liaison officers attending meetings to provide backup translation. During meetings, headsets were provided by Baffinland, so attendees could properly hear the translations. Minutes from these meetings were recorded by Baffinland and incorporated in a central public consultation database (Volume 2, Appendix 2A).

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4.2.2 MEETINGS WITH GOVERNMENT AND INUIT ORGANIZATIONS

With the renewed exploration activities in 2004, initial engagement was conducted with Qikiqtani Inuit Association (QIA) as landowner representatives. Baffinland entered into the Inuit Impact Benefit Agreement (IIBA) discussions with the QIA in 2008 and met frequently that year. During 2009 there were almost no discussions with the QIA regarding the IIBA. Discussions recommenced in 2010 and continued throughout 2011.

A Mineral Development Advisory Group (MDAG) meeting, coordinated by AANDC in Iqaluit, was held in June 2007. The meeting brought together a number of government agencies and Inuit organizations that may be responsible for issuing permits or approvals, and/or that will be involved in some capacity with the social and environmental process.

Baffinland held a number of meetings with Inuit organizations, government agencies, and Institutes of Public Government (IPGs) since that time until present, starting with overview discussion on the Project and moving to key issues and discussions in context of the environment review by NIRB. Other meetings with the QIA, federal and territorial governments have been ongoing, relating to both the permitting of current operations, and the various steps in the environmental review of the mine development project.

4.2.3 EARLY REVENUE PHASE

Information regarding Baffinland's decision to pursue the Early Revenue Phase was first communicated to stakeholders in January of 2013 with visits to Pond Inlet, Igloolik, and Hall Beach. At the same time stakeholders within the QIA, Federal and Territorial Governments, and regulators were communicated with. During 2013, regular meetings were held specifically in the community of Pond Inlet and included meetings with the Hamlet Council, the Hunters and Trappers Organization, and general public information sessions.

In addition to the general consultation sessions with groups in Pond Inlet, the environmental assessment process required a number of meetings to be held in Pond Inlet over the course of 2013 during which time the opportunity to discuss the Early Revenue Phase was also made possible.

The input that was received from Pond Inlet during 2013 aided the Company in preparing its' regulatory submissions and also helped in understanding the communities questions and comments regarding ERP.

4.2.4 PHASE II

When Baffinland first contemplated a second phase of Early Revenue Phase, the Company did a tour of the North Baffin communities to communicate this decision in early 2015. It was acknowledged that certain components of the project proposal would benefit from additional consultation with communities regarding perceived impacts and potential mitigations for those impacts, to be included in the environmental and social assessment. As per the IIBA articles on the collection and use of Traditional Knowledge, Baffinland has been working with the QIA to run Phase II workshops in the communities of

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Pond Inlet and Arctic Bay on topics such as contemporary land use, shipping through ice, and caribou. In addition, because the Phase II proposal contains a project activity not previously permitted for the northern shipping route (winter shipping), Baffinland conducted a tour in Labrador of the Voisey's Bay winter shipping route with key individuals who could observe shipping through ice in person. It is expected similar tours will take place as the permitting process progresses.

4.3 KEY STAKEHOLDER ISSUES

Engagement activities to date have been well-attended and the feedback on the proposed Project was balanced. The engagement activities have identified some key issues of concern which have helped to focus the EIS. TABLE 4-1 summarizes the key issues and concerns identified through community meetings and how Baffinland has responded to these issues.

TABLE 4-1: KEY CONCERNS

| Key Concerns | How Baffinland Addressed the Concern |
|---|---|
| A desire to maintain the existing social fabric of the Inuit culture. | Baffinland recognizes and respects this strong desire, and is committed to developing a project that is consistent with this desire. There are various commitments and process in place and being developed that speaks to this including the Human Resources Strategy, Article Sixteen of the IIBA (Inuit Qaujinajatuqanagit or IQ, Article Eleven of the IIBA (Workplace Conditions, specifically Cultural Recognition) and the establishment of the Ilagiktunut Nunalinnullu Pivalliajutsait Kiinaujat Fund (INPK Fund) under Article Twelve of the IIBA, Support for Communities. |
| Opportunities for training and employment | Baffinland assessed training and employment as Valued Socio-economic Assessments, and has developed a draft Human Resources Strategy aimed at maximizing training and employment opportunities. Inuit Employment and Training Opportunities are also an integral component of the IIBA in providing benefit to local Inuit communities. Article Seven includes commitments regarding prioritizing hiring; posting techniques; qualifications; selection and career advancement. Article Eight outlines commitments regarding training opportunities; funding and programs. |
| Potential impacts on wildlife (with a focus on caribou migration patterns affected by the railway and marine mammals being disrupted by shipping), the potential to affect food security, and a desire to be compensated for impacts on wildlife. | Caribou and marine mammals were the focus of the IQ study. Effects assessments have been prepared for caribou, marine mammals and land use (including harvesting), and subsequently, monitoring programs and management plans have been developed to monitor project interactions and mitigate any effects. Articles Nine, Fifteen and Seventeen of the IIBA refer to ongoing monitoring of Project impacts to marine and terrestrial wildlife. These article supplement conditions made under the water licence and Project Certificate. |
| Opportunity for regional economic development and the need to make sure that the IIBA will benefit directly affected local communities. | Baffinland and the QIA signed an IIBA on September 6 2013. The IIBA, specifically Article six, includes provisions on local procurement and contracting, Baffinland has committed to both identifying opportunities for local participation and providing support for capacity building of Inuit Firms. Support will be provided throughout the procurement process in addition to funding support via the Business Start-Up and Capacity Building Fund that will be administered by the QIA. |
| The concern of environmental degradation due to spills, contamination and pollution and need for effective environmental controls and mine closure planning. | Baffinland has developed a comprehensive environmental management system (see Volume 10 of the Final Environmental Impact Statement (FEIS) and Addendum to FEIS, both submitted to NIRB and on the public record). Updates to management plans are made annually and submitted to the Nunavut Impact Review Board, Nunavut Water Board and Qikiqtani Inuit Association. |

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4.4 CONSULTATION PLANS MOVING FORWARD

Now that the Mary River Project has moved into the Construction and Operations Phase, Baffinland has established a physical presence in Iqaluit and has staffed the office with a Senior Manager of Northern Affairs, as the Company's representative in Nunavut. Baffinland also employs an IIBA Implementation Manager, and currently has a vacant IIBA Inuit Employee and Training Coordinator position.

The Senior Manager of Northern Affairs manages the network of Baffinland Community Liaison Officers in the neighbouring communities to Milne Inlet and Mary River. The responsibilities of the Iqaluit Senior Manager will be as follows:

- Establish Baffinland's presence in Nunavut; staff and manage Iqaluit office
- Liaise with representatives of Territorial and Federal departments/institutions
- Liaise with QIA, Inuit organizations, NGOs and other institutions
- Organize and schedule public information forum/sessions
- Set up an information local to disseminate Project information
- Liaise with local/regional media to disseminate Project information
- Respond to local inquiries from individual and business groups related to Project opportunities
- Establish database of business and individuals that can provide services to the Project
- Recruit staff for the Iqaluit Office in anticipation of Project approval.

4.4.1 APPROACH AND CONTENT

Baffinland establishes regular contact with local communities to ensure up-to-date information is available for stakeholders.

Originally, most of the construction was contractor based employment; however, as Baffinland moved into a self-perform stage, many of the contract employees were either directly hired by Baffinland or were hired by other contractors.

Baffinland and its contractors have worked closely to ensure that existing communication channels are maintained, that ongoing messages are consistent, and that information is provided on key topics including hiring practices, local worker training, worker camps, codes of conduct and upcoming construction activities in the area.

Baffinland undertakes regular engagement activities with different stakeholder groups during the construction period. These may include such engagement methods as outlined in the TABLE 4-2.

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4.4.2 DISCLOSURE MATERIAL

All general and typical hand-outs providing information about the Project and its effects on health, safety, environment, and community issues, all hand-outs answering “frequently asked questions,” the EIS summary, and possibly the NIRB Annual Reports will be distributed in both Inuktitut and English.

While Baffinland recognizes the need to be in regular contact with local community stakeholders, it is also conscious of the potential for ‘consultation fatigue’ and disruption to traditional livelihoods due to intensive engagement with the Project. The activities outlined above are indicative of the types of activities and methods that may be.

TABLE 4-2: TYPICAL STAKEHOLDER ENGAGEMENT ACTIVITIES

| No. (#) | Stakeholder Group | Engagement Methods/ Techniques | Description and Details |
|---------|---------------------------------|--|---|
| 1 | Neighbouring communities | Meetings with community organizations and associations | Meetings are held with relevant individuals or groups to discuss overall Project progress and any issues or concerns that they may have about the Project. |
| | | Community meetings | In addition to the range of other avenues for engagement and information disclosure, the Project will arrange formal meetings with neighbouring communities periodically to provide a status report about the Project and hear any concerns from stakeholders. |
| | | Community awareness and training sessions | Awareness and training sessions will be conducted with neighbouring communities, particularly related to community health and safety. |
| | | Company/Community Newsletter | The Project may develop and establish a regular newsletter. |
| | | Employment /Local Hire | Employment opportunities and employees will become valuable channels for disseminating information related to on-site Project activities and progress. |
| 2 | Vulnerable people or groups | Meetings and discussions | Baffinland will meet specifically with vulnerable people/groups (e.g., women) to discuss relevant support programs. Baffinland will work with local formal and customary authorities in identifying and preparing assistance measures for vulnerable people through the IIBA. |
| 3 | Other local committees | Focus group discussions and meeting on key topics | Discipline specific committees will be utilized during construction to address important issues affecting the local populations. |
| 4 | Public/Other interested Parties | Baffinland public website | Regular updates about the Project on the public website. |
| | | Media including notices, advertisements and other relevant materials | Relevant media channels will be used to keep the local and regional public informed about the Project. |

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| | | NIRB Annual Report and NWB (Nunavut Water Board), QIA (IIBA Annual Implementation, Forum, and Commercial Leaser) | The Project will produce an Annual Report that details the Project's performance on environmental and socio-economic monitoring, including stakeholder engagement. This report would be disclosed to the general public. |
| 5 | Government s Regulators | Meetings | Meetings will be held with relevant individuals or groups to discuss overall Project progress and any issues or concerns that they may have about the Project. |
| | | Reports | Baffinland will submit reports on project progress as required. Baffinland may also prepare reports as requested by various organizations. |
| 6 | Inuit Organization s | Meetings | Meetings will be held with relevant individuals or groups to discuss overall Project progress and any issues or concerns that they may have about the Project and to meet the requirements of the IIBA. |
| | | Reports | Baffinland will submit reports on project progress as required. Baffinland may also prepare reports as requested by Inuit organizations. |

4.5 OPERATIONS (2015 AND BEYOND)

Throughout the operation and closure phases, Baffinland's Sustainable Development Department in Oakville Ontario, and the Baffinland Community Liaison Officers located in Iqaluit and across Baffin Island, will continue to be Baffinland's most valuable agents in disseminating Project related information to the affected communities.

Engagement in operations for the Approved Project (and into closure) focuses on day-to-day operation of the mine, shipping of ore, future railway, port and ancillary facilities and will include progressive closure and reclamation through to full closure. The main objectives of the engagement process during the operation and closure periods are as follows:

- Provide relevant stakeholders with information about the progress of the Project
- Maintain and further develop constructive relationships with the local communities
- Maintain broad support for the Project locally, regionally and nationally
- Engage with communities on monitoring and evaluation of Project impacts
- Maintain awareness and solicit feedback on social, environmental and safety issues that may be of concern to stakeholders
- Identify opportunities for Baffinland to make sustainable contributions to the host communities and the wider regions of Nunavut

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- Maintain partnerships with local communities for ongoing participatory monitoring of the Project (e.g. for water, air quality, wildlife)
- Manage any concerns or complaints from stakeholders, including employees and local community members
- Monitor community attitudes toward the Project; and
- Fulfil the requirements of the IIBA.

The main activities for stakeholder engagement and consultation that may be incorporated during the operations and closure phases are presented in TABLE 4-3.

TABLE 4-3: SUMMARY OF ANTICIPATED AND ONGOING ENGAGEMENT ACTIVITIES DURING OPERATIONS AND CLOSURE

| Activities | Description and details |
|--|---|
| Regular updates about the Project/Information Disclosure | Regular revision of information on the Baffinland public website. Fact sheets, reports, brochures, and pamphlets targeted at specific populations, organizations or groups. Notices and Tri-folds in local governmental offices and Baffinland Community Liaison offices. Radio information spots and updates appropriate to local communities. Periodic community consultation. Newsletters to neighbouring communities Progress updates on website Contact@baffinland.com – email always available for someone to ask questions or raise issues |
| Disclosure of employment opportunities | Notification of employment and training opportunities through the Baffinland public website, Linked-in and other recruitment websites, Baffinland Liaison Officer offices and other locations. |
| Stakeholder engagement activities | Stakeholder engagement will continue throughout the operations phase. Public information activities will form part of day-to-day functions. Community relations staff will be in place throughout the life of the Project to maintain ongoing relationships with local communities and other stakeholders. |
| Closure and reclamation activities | Liaise with communities and other relevant stakeholders on plans for land reclamation, pilot programs and closure activities. Liaise with communities and other relevant stakeholders approximately three to five years prior to the start of major reclamation activities. Work with local government and community leaders in anticipation of Project shut down regarding retrenchment opportunities and impacts. |
| Participatory monitoring and evaluation | Local populations will continue to be involved in Project monitoring, including for example marine mammals, terrestrial, water quality, air quality and traffic monitoring |

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| Activities | Description and details |
|--|---|
| Complaints and grievance handling and management | A formal complaints and grievances process will be introduced and continue through to the operations phase. |

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5 RESOURCES AND RESPONSIBILITIES

Everyone involved with the Project is a representative of Baffinland, and therefore has certain responsibilities in stakeholder engagement. Responsibilities for effective engagement are shared throughout the organization. Internal communications are required to effectively disseminate key messages, to maintain consistency in the messages and how they are delivered.

5.1 ROLES AND RESPONSIBILITIES

TABLE 5-1 highlights the key project personnel responsible for implementation of the SEP, with a description of their specific responsibilities.

5.2 OTHER RESOURCES

It is in the interests of the Company to encourage dialogue and the building of relationships amongst stakeholder groups. The building of such relationships encourages transparency and may provide collective context and insight into how Project activities are affecting stakeholder groups.

TABLE 5-1: ROLES AND RESPONSIBILITIES FOR STAKEHOLDER ENGAGEMENT AND COMPLAINTS PROCESS

| Title/Role | Responsibilities for Engagement Activities |
|---|---|
| Vice President, Sustainable Development | <ul style="list-style-type: none"> • Oversee and approve engagement activities • Manage overall dialogue with government and community stakeholders • Participate in and support relevant engagement activities • Direct Northern Affairs Office |
| Sustainability and Reporting Specialist | <ul style="list-style-type: none"> • Develop communications materials including editorial on baffinland.com • Respond to all emails on contact@baffinland.com or direct queries to correct persons in Baffinland • Oversee the implementation of the complaints management system (Complaints Manager) • Liaise with the Senior Northern Affairs Manager on an ongoing basis (BCLO Monday calls) • Alert the Vice President Sustainable Development on any/all priority issues, flag potential problems to, direct all media queries to same. |
| Senior Northern Affairs Manager (Iqaluit Office) | <ul style="list-style-type: none"> • Liaise with representatives of the Territorial and Federal governments and departments • Liaise with QIA and other Inuit associations • Oversee implementation of the SEP • Coordinate with Project operations to ensure that engagement messages are consistent with Project plans • Alert the Vice President, Sustainable Development to emerging issues and trends • Manage Baffinland Liaison Officers • Ensure that complaints are initiated correctly through the Grievance Mechanism or directed back via the internal Human Resources process • Recruit new staff, manage staff and conduct training |

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| Title/Role | Responsibilities for Engagement Activities |
|---|---|
| Baffinland Liaison Officers Pond Inlet Igloolik /Hall Beach Arctic Bay Clyde River | <ul style="list-style-type: none"> • Co-ordinate and ensure that engagement activities occur as planned • Identify, manage and report on engagement non-compliances • Hold regular meetings with the key department managers to monitor activities, stakeholder feedback and issues • Implement the complaints management system • Advise managers and their respective departments on recommended engagement practices and procedures • Monitor community attitudes and impacts of Project actions and report emerging issues/trends • Organize and attend engagement meetings and other activities • Prepare monitoring and evaluation reports • Attend BCLO calls |
| Head of Human Resources | <ul style="list-style-type: none"> • Manage project employment needs and skills • Manage training programs and recruitment • Review and respond to serious complaints, as required |
| Human Resources Superintendents (Mary River and Milne) | <ul style="list-style-type: none"> • Tracks Project employment needs and skills requirements • Establish training programs and local recruitment of employee • Implement the complaints management system (Complaints Officer –CO) • Track level of complaints and report to management |

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6 GRIEVANCE MECHANISM

As a means to document, assess, and respond to external complaints or feedback that may arise, the positions responsible for implementing Baffinland’s complaints management process (see Table 5.1) will take practical measures to address all legitimate complaints to the satisfaction of complainants.

It should be recognized that complainants will not distinguish between activities undertaken by Baffinland and its contractors, so all complaints will be directed to Baffinland. It is Baffinland’s responsibility to manage complaints against contractors and construction/operation activities as well as those against Baffinland. The Company can only resolve issues on which it has direct control. For issues outside of Baffinland’s control, the Company will endeavor to facilitate a resolution where possible.

Some potential complaints related to the Mary River Project are provided in TABLE 6-1. Complaint types are categorized according to Project activities and type of effect.

TABLE 6-1: COMPLAINT TYPES

| Activities/Type of Effect | Complaint Type | Nature of Complaint |
|-----------------------------|----------------|---|
| Air Traffic | 1 | Low flight, noise, interference with tourism, interference with wildlife |
| Ground Traffic | 2 | Noise, habitat disturbance, interruption with hunting, tourism, camping |
| Shipping Traffic | 3 | Noise, interruption with boating, hunting and camping |
| Visual | 4 | Unsightly views and/or activities |
| Economic | 5 | Increased cost of living or reduced harvest affecting livelihood |
| Cultural | 6 | Destruction of important places and archaeological resources; degradation of traditional culture; language; access to traditional hunting grounds |
| Social | 7 | Truancy, increased alcohol usage (abuse), marital infidelity, family neglect, community disruption due to abuse of earnings or other |
| Health | 8 | Health concern attributed to project activities |
| Recruitment/Human Resources | 9 | Person (s) not provided feedback as to why they were not hired; time of processing application; unclear recruitment process; opportunities not posted in a satisfactory way |
| Sponsorships | 10 | Sponsorship not granted for activity or event. |
| IIBA | 11 | Concern relating to compliance of the IIBA that may not be covered off by other Complain Types |
| Environmental | 12 | Concerns relating to the natural environment outside of those caused by air, ground and shipping traffic noted above. |
| Other | 13 | Other complaints of a nature not addressed above |

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6.1 COMPLAINTS MANAGEMENT PROCEDURES

Baffinland management will follow these procedures to manage complaints:

- Maintain the identity of all complainants and the complaints they raise as confidential;
- Assign a Complaints Number to all complaints;
- Document all complaints in a Complaints Register;
- Document all verbal complaints on a Complaints Form and indicate that it was submitted verbally;
- Screen out unfounded complaints and address legitimate complaints;
- Prioritize complaints according to magnitude (severity, geographic extent, number of people affected) of effect;
- Notify complainants of the proposed action(s) to rectify the complaint or the reasons why a complaint will not be acted upon, if necessary;
- Consult with complainant for further explanation on complaint, when necessary;
- Involve organizations, contractors, and/or community groups, where necessary, to manage complaints (i.e., Hamlets, Qikiqtani Inuit Association);
- Document the action(s) taken to address complaints and the dates when they were both initiated and addressed; and
- Document follow-up action with details including, why the need for follow-up, who will be responsible, what is expected from the follow-up and when follow-up reports are expected.

The Complaints Officer in charge will manage all complaints in accordance with FIGURE 6-1.

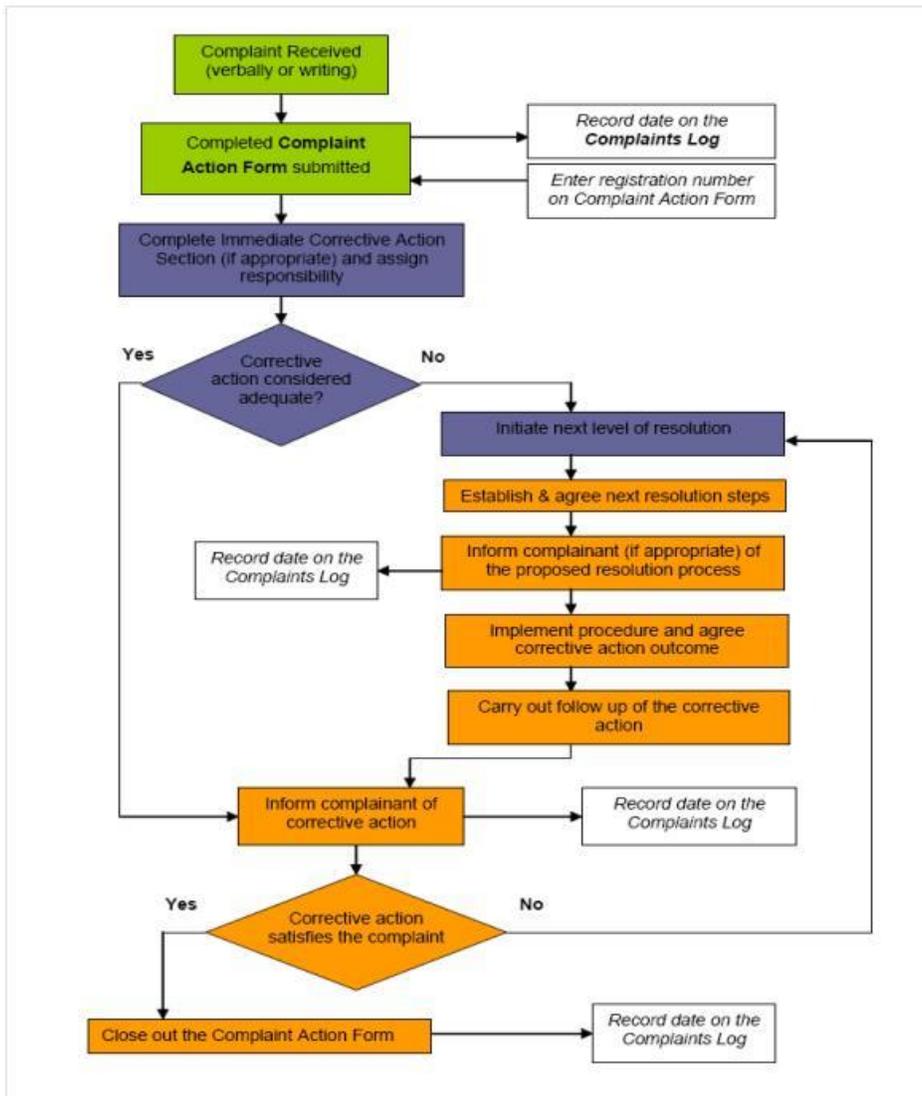


FIGURE 6-1: COMPLAINTS RESOLUTION MECHANISM

The following general points apply to the complaints procedure:

- All Baffinland employees and contractors/consultants shall direct complainants to the designated officer. All complainants must complete a Complaint Action Form to formally register their complaint. Complaints must be accompanied by a name, address, and contact details for Baffinland to provide a response.
- Complaints received as letters or in formats other than a Complaint Action Form will be reviewed and if the contact information is sufficient, the first response of the Project will be to ask the complainant to formalize the complaint by filing a Complaint Action Form.

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- The Baffinland Liaison Officers will assist those who have difficulty or are inexperienced with the complaints process in preparing and filing complaints.
- Complaints may be submitted at the Baffinland Liaison Officer offices or to the COs any time during open hours.

6.2 LODGING AND RECORDING PROCEDURE

To lodge a formal complaint, the complainant must:

- Fill out a Complaint Action Form, including name, address, and contact details (Part 1) and all information necessary to accurately describe the complaint (Part 2).
- Submit the completed Complaint Action Forms to the Baffinland Liaison Officer or a Baffinland office, who will then pass the form on to the Corporate Affairs. The Complaints Action Form can be submitted via email to contact@baffinland.com or via the Baffinland Website which includes contact for the Head of Corporate Affairs.

Corporate Affairs will record the received Complaint Action Form on the Complaints Log. The Complaints Log entry will include the following information about the complaint:

- Date received
- Brief summary of complaint; and
- Complainant contact information.

Corporate Affairs will then record the complaint registration number from the Complaints Log on Part 1 of the original Complaint Action Form.

6.3 COMPLAINT RESOLUTION

Baffinland's goal is to resolve complaints as expeditiously as possible. The Company can only resolve issues on which it has direct control. For issues outside of Baffinland's control, the Company will endeavour to facilitate a resolution where possible.

A four-level complaint resolution system has been developed to make sure that the process is timely, effective, and transparent. The next level of complaint resolution is triggered if the complaint cannot be resolved at a lower level, although Baffinland recognizes and accepts that complainants may proceed directly to Level 3 or 4 to lodge complaints. Complaint levels are:

- Level 1: Complaints that can be resolved by the Baffinland Liaison Officer and appropriate Manager(s) directly with the complainant - dealt with through immediate corrective action.

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- Level 2: Complaints that require the input and oversight of the Baffinland’s management or executive leadership, and/or when a complaint is deemed urgent or critical – the Complaints Officer is responsible for reporting Level 2 complaints to the appropriate management personnel.
- Level 3: Complaints that require mediation by an external and independent party – Baffinland will facilitate involvement of the relevant agency, individual or group that can act as a mediator in resolving disputes between the community and the Project. Senior leadership will decide how to advance this grievance.
- Level 4: Legal action is available to any citizen and to Baffinland, in conformance with applicable laws. A complaint can be taken to progressively higher levels of government until resolution is achieved. There is also recourse under Canadian law for a complainant to initiate civil court action. The Company does not control this level of resolution but acknowledges this process is in place and available. It also acknowledges that some complainants may choose to proceed directly to this level of resolution. Senior Management will be responsible for Level 4 grievances.

6.4 SCREENING PROCEDURE

The Baffinland Liaison Officer will screen all complaints received to separate questions, requests, and general comments from actual complaints. Questions, requests, and general comments will be listed as “non-complaints” on the Complaint Action Form and Complaint Log under the “Actions Taken” category. Non-complaints are not subject to the complaints resolution process, and are not included in the monthly tally of complaints received.

Although they are not complaints, commonly asked questions and requests should be categorized and tallied so that they can be appropriately addressed through the public consultation process.

Once complaints are passed to the Complaints Officer, they will screen and forward to the appropriate manager. The same screening approach is taken for all queries submitted to contact@baffinland.com.

All received complaints that have been verified by the Complaints Officer as actual or unique complaints will be resolved via the following complaint resolution procedure.

6.5 RESOLUTION PROCEDURE

All complaints must be acknowledged in writing within one month of receipt. Investigations into the validity of the complaint are to begin as soon as practical. Where appropriate, verbal responses may also be given. The Baffinland Liaison Officer will record all responses in the Complaints Log.

The Baffinland Liaison Officer will initiate resolution of all complaints that require specific corrective actions and completes the “Immediate Action” section of Part 3 of the Complaint Action Form. As not all complaints can be readily resolved, the initial response may be a summary of what is planned and when

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it is likely to occur, recorded in the “Immediate Action” section of the Complaint Action Form. Some complaints received may be the subject of another complaint currently being resolved.

The Baffinland Liaison Officer will consult with the responsible person/group within Baffinland required to resolve the complaint. When the Baffinland Liaison Officer staff is not qualified to respond to certain Level 1 or higher issues on its own, the complaint must be given to the CM, who must approve any response before it is implemented.

Baffinland’s objective is to address complaints that can be resolved by relatively simple, straight-forward actions within 15 days of receipt of the Complaint Action Form. If complaints take longer to address, the complainant will be kept informed of resolution progress on a regular basis.

Once the complaint has been addressed, the Baffinland Community Liaison Officer will communicate the resolution of the complaint to the complainant. If the complainant is satisfied with the resolution, the Baffinland Liaison Officer will close out the Complaint Action Form by signing and dating Part 4 of the form. If the complainant is not satisfied with the resolution of the complaint, the resolution process is restarted, moving up a resolution level as necessary.

New complaints regarding issues previously resolved through the complaints process and “closed out” indicate that regardless of the complaint’s “closed” status, the complainant is not satisfied with the resolution and thus additional measures need to be taken to resolve the complaint.

Complainants who cannot resolve their complaints with the Project can take action in a court of law (Level 4).

6.6 MONITORING AND REPORTING

The Baffinland Liaison Officer is responsible for the following:

- Weekly monitoring of complaints, including screening complaints to remove non-complaints, review of the number and status of complaints, and any outstanding issues requiring resolution
- Producing complaints procedure reports for the Complaint Officer no less than once per month – these reports will be discussed at relevant management meetings and include the following information:
 - ◆ Complaint subject
 - ◆ Discussion of complaint’s validity
 - ◆ Importance of issue raised
 - ◆ Measures taken and any required follow-up
 - ◆ Analysis of types of complaints and complaint levels
 - ◆ Actions taken to reduce complaints.

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The levels and types of complaints received by the Project as well as the speed with which complaints are dealt with will also be monitored by the Vice President, Sustainable Development and the Head of Human Resources on an annual basis.

6.7 RECORD KEEPING AND ARCHIVING

All complaints documentation shall be stored at a Baffinland location that offers appropriate privacy and security protections for these potentially sensitive files. Documentation pertaining to a specific complaint shall be kept on file for three (3) years; after that it shall be archived under appropriately secure conditions designed to ensure privacy, or it will be destroyed.

6.7.1 COMPLAINT ACTION FORM

(Note: for the information of an individual/organization wishing to submit a complaint)

Baffinland Iron Mine Corporation (Baffinland) has been working on its Mary River Project since 2004, carrying out mineral exploration drilling, engineering studies and environmental programs. Over 2007-2008, Baffinland carried out a bulk sampling program, where the company removed a large sample of the iron ore to send to potential customers. 2013-2014

As a way of understanding local concerns, Baffinland has developed a Grievance Mechanism to hear concerns or complaints people may have, and to follow up to see the potential issues resolved. Baffinland wants to bring as much benefit to the people of the region as possible, and at the same time make sure that the company does not have a big negative effect on the people and the wildlife.

If you are bothered by the effects of a project activity, you can log your concern by filling the attached Complaints Form and submit it to the address provided below. Your complaint(s) will be addressed in the best practical way possible and in a timely manner. You can also submit your complaint(s) verbally at the office of the Community Liaison Officers who will fill out the Complaints Form on your behalf.

Please submit all complaints (written or verbal) to the nearest Community Liaison Officer (CLO), or directly to the company.

6.8 INTERNAL COMPLAINTS

From time to time, employees may have concerns regarding their work environment, team or job activities. These concerns may involve peers or another employee or manager/supervisor. To address these concerns, Baffinland has implemented an Employee Concerns Policy. The Policy outlines the protocol to be taken when concerns and misunderstandings arise from everyday working relationships.

Occasionally, local employees will turn to the Baffinland Liaison Officers within their communities to help resolve an issue. In these cases, BCLOs will direct the complainant back to the Employee Concerns Policy to be resolved internally. As detailed in the Policy, if an employee is not comfortable speaking with the manager/supervisor, the employee can elect to speak directly with a Human Resource Superintendent.

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Appendix A - Sample Forms

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A.1 Complaint Action Form

(Note: to be completed by individual/organization submitting a complaint)

NAME OF COMPLAINANT

SUBMISSION METHOD

Verbal

Written

CONTACT INFORMATION

| |
|-------------------------------|
| Name of Community: |
| House#: |
| Phone #: (if available) |
| Email Address: (if available) |

DATE SUBMITTED

Month Day..... Year.....

WHAT IS THE COMPLAINT ABOUT (e.g. Noise)

| | | | |
|--|--|--|--|
| | | | |
|--|--|--|--|

DETAILED COMPLAINT (Use additional sheet if necessary)

| | | | |
|--|--|--|--|
| | | | |
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A.2 BAFFINLAND COMPLAINANTS NOTIFICATION FORM

(Note: to be completed by CLO or other responsible officer)

The CLO or other responsible officer(s) will contact complainant as soon as a decision is made and an action plan developed for the complaint. Where multiple complaints are lodged for the same issue or against the same project activity, the officer(s) will convene a meeting with all complainants and address the issue by consultation.

NAME OF COMPLAINANT

COMPLAINTS#

CONTACT INFORMATION

| |
|-------------------------------|
| Name of Community: |
| House#: |
| Phone #: (if available) |
| Email Address: (if available) |

COMPLAINT

PROPOSED ACTION

| Need to consult with complainant(s) | YES | NO |
|--|-----|----|
| If 'yes' when? Date: | | |
| If 'yes' where? Location: | | |
| | | |

SPECIFIC ACTION(S) TO ADDRESS COMPLAINT

| |
|--|
| |
| |
| |

ACTION BY

| | |
|-------|------------|
| Name | Position |
| Date: | Signature: |

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A.3 Complaints Log

| Complaint Number (CO-[2-digit year]-001) | Complaint Type (1 to 13) | Brief Description of Complaint | Name of Person (Complainant) | Date Resolved | Action Taken to Resolve | Approval Person |
|---|---------------------------------|---------------------------------------|-------------------------------------|----------------------|--------------------------------|------------------------|
| CO-14-001 | | | | | | |
| CO-14-002 | | | | | | |
| CO-14-003 | | | | | | |
| CO-14-004 | | | | | | |
| CO-14-005 | | | | | | |
| CO-14-006 | | | | | | |
| CO-14-007 | | | | | | |
| CO-14-008 | | | | | | |
| CO-14-009 | | | | | | |
| CO-14-010 | | | | | | |
| CO-14-011 | | | | | | |
| CO-14-012 | | | | | | |
| CO-14-013 | | | | | | |
| CO-14-014 | | | | | | |
| CO-14-015 | | | | | | |
| CO-14-016 | | | | | | |
| CO-14-017 | | | | | | |
| CO-14-018 | | | | | | |

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