



INDIGENOUS ENGAGEMENT POLICY (Canada)

1. INTRODUCTION

KAP Minerals (KAP) acknowledges that our operations take place on the traditional territories of Indigenous Peoples who have cared for these lands, waters, and communities since time immemorial. We recognize and respect the inherent rights, cultures, and governance systems of First Nations, Inuit, and Métis Peoples, and we are committed to advancing reconciliation through meaningful engagement, consultation, and partnership.

This Indigenous Engagement Policy outlines KAP's approach to building and maintaining respectful, transparent, and mutually beneficial relationships with Indigenous communities in the areas where we operate. The policy reflects our commitment to Canada's legal and constitutional framework, the Truth and Reconciliation Commission's Calls to Action, and the principles of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

2. COMMITMENT

KAP recognizes the importance of working cooperatively and effectively with Indigenous communities. Our relationship with these communities will have the same priority and commitment of Company resources as we would devote to other partners or interested parties strategic to the development and ongoing maintenance of KAP's current and future businesses.

3. PURPOSE

The purpose of this policy is to:

- Guide KAP's approach to Indigenous engagement and consultation throughout all stages of mine development, operations, and closure.
- Ensure that Indigenous rights and interests are considered and respected in company decision-making.
- Promote collaborative and sustainable relationships that support shared prosperity, environmental stewardship, and community well-being.

4. **GUIDING PRINCIPLES**

Our approach to Indigenous engagement is grounded in the following principles:

- **Respect:** Recognizing the rights, histories, and knowledge systems of Indigenous Peoples;
- **Inclusion:** Ensuring Indigenous voices are meaningfully included in planning, operations, and decision-making processes.
- **Transparency:** Communicating openly and honestly about project activities, timelines, and impacts.
- **Collaboration:** Building partnerships that support mutual goals in employment, training, business development, and environmental stewardship.
- **Accountability:** Upholding our commitments and continually improving our engagement practices.

5. **ENGAGEMENT AND CONSULTATION FRAMEWORK**

KAP will engage with Indigenous communities in a manner consistent with both **Crown consultation obligations** and **community-specific engagement protocols**. While the duty to consult rests with the Crown, KAP recognizes its role in supporting this process through proactive, respectful, and good-faith engagement.

To this end, KAP will:

- **Identify:** all Indigenous communities whose rights and interests may be affected by the project.
- **Respect community protocols** for communication, consultation, and decision-making, including the use of designated representatives or consultation offices.
- **Provide timely and accessible information** on project plans, potential impacts and mitigation measures.
- **Engage early and often**, maintaining dialogue throughout all phases of the mine's development and operation.
- **Document and track engagement activities** to ensure transparency and accountability.
- **Collaborate on environmental monitoring and stewardship initiatives** to support shared values and sustainability goals.

6. **BUSINESS AND PARTNERSHIP OPPORTUNITIES**

KAP is committed to creating opportunities that deliver tangible benefits for Indigenous communities, including:

- Employment, training, and apprenticeship opportunities;
- Procurement and contracting opportunities for Indigenous-owned businesses; and
- Community investment initiatives that align with local priorities and values.



7. IMPLEMENTATION AND CONTINUOUS IMPROVEMENT

This policy will be implemented through internal procedures, staff training, and performance measure that ensure consistent and culturally appropriate engagement. KAP will regularly review and update this policy to reflect evolving best practices, community feedback, and legislative requirements.

8. CONCLUSION

Through this Indigenous Engagement Policy, KAP reaffirms its commitment to building strong, lasting relationships based on respect, trust, and shared prosperity. We will continue to listen, learn, and work collaboratively with Indigenous Peoples to ensure that our operations contribute positively to both the land and the communities that sustain it.

Appendix A – Indigenous Engagement and Consultation Protocols

A.1 Purpose

This appendix provides a structured framework for how KAP Minerals (KAP) will plan, implement, document, and evaluate engagement and consultation with Indigenous communities throughout the life of the mine project. The protocols ensure that engagement activities are respectful, transparent, and consistent with both Crown and community expectations.

A.2 Foundational Commitments

KAP will uphold the following commitments in all engagement and consultation activities:

- **Respect for Rights:** Engagement will recognize and respect the constitutionally protected rights of Indigenous Peoples.
 - **Recognition of Protocols:** Each community's own consultation procedures, communication protocols, and governance structures will guide our approach.
 - **Cultural Awareness:** Company representatives will receive cultural awareness training and follow cultural protocols when visiting or meeting with Indigenous communities.
 - **Good Faith and Transparency:** Engagement will be carried out in good faith, with full, honest, and timely sharing of information.
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A.3 Engagement Phases

Engagement and consultation will occur continuously throughout all project stages.

1. Early Engagement (Pre-Construction and Planning)

- Identify Indigenous communities whose rights and interests may be affected.
- Initiate early contact with leadership and consultation offices to establish communication channels.
- Seek guidance on each community's preferred engagement protocol.
- Share accessible information about project scope, timelines, and potential impacts.
- Offer opportunities for community representatives to visit the site and meet KAP's staff.

2. Project Development and Operations

- Maintain open and ongoing dialogue through regular meetings, updates, and joint review sessions.
- Respond promptly and respectfully to questions, concerns, or requests for information.
- Collaborate on impact mitigation measures and community benefit initiatives.
- Support employment, training, and contracting opportunities for community members and Indigenous businesses.
- Engage community members in environmental monitoring, reclamation, and land stewardship activities.

3. Closure and Post-Closure

- Work collaboratively with Indigenous communities to plan mine closure and reclamation in alignment with community values and traditional land uses.
- Ensure Indigenous knowledge informs post-closure monitoring and land restoration efforts.
- Provide transparent communication on timelines, progress, and outcomes.

A.4 Communication Protocols

- **Designated Contacts:** KAP will identify internal Indigenous Relations leads as points of contact for communities.
- **Respect for Community Protocols:** All communications will follow the community's preferred process — for example, through Band Council, consultation office, or Elders Council.
- **Information Sharing:** Project materials will be provided in accessible formats, both digital and hard copy, and explained in plain language.
- **Meeting Records:** All meetings and discussions will be documented, with summaries shared with participants for confirmation and accuracy.

A.5 Responding to Concerns

- Concerns or issues raised by communities will be acknowledged promptly and documented in an **Engagement Log**.
- KAP will work collaboratively with communities to understand and address issues through dialogue and, where appropriate, joint problem-solving.
- Where unresolved concerns persist, the company will engage with community leadership and relevant government agencies to seek fair and timely resolution.

A.6 Reporting and Accountability

- KAP will maintain detailed records of engagement and consultation activities, including participants, topics discussed, outcomes, and follow-up actions.
 - Annual reports summarizing engagement activities and outcomes will be shared with Indigenous communities and regulatory authorities, as appropriate.
 - Continuous improvement measures will be implemented based on feedback, monitoring results, and evolving best practices.
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A.7 Review and Updates

These Engagement and Consultation Protocols will be reviewed annually, or more frequently as required, to reflect:

- Changes in legislation or regulatory expectations;
 - Feedback from Indigenous communities; and
 - Lessons learned through ongoing engagement activities.
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A.8 Summary

Through these protocols, KAP aims to ensure that Indigenous engagement is respectful, meaningful, and effective — supporting the shared goals of environmental stewardship, cultural respect, and long-term community well-being.

