



ALAMOS GOLD INC.

Island Gold District - Magino Mine

2025 Annual Report to the Impact Assessment Agency of Canada (IAAC)

Reporting Period January 1 to December 31, 2025, as per Environmental
Assessment Decision Statement Conditions 2.9 and 2.10

Includes Schedule of Decision Statement Conditions (as per Decision Statement
Condition 9.1) and Schedule of all Activities (as per Decision Statement Condition
9.2)

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LIST OF ACRONYMS

Batchewana First Nation	BFN
Canadian Council of Ministers of the Environment	CCME
Class Environmental Assessment for Resource Stewardship and Facility Development Projects	Class EA-RSFD
Certified Engineering Technologist	C.E.T.
Environment and Climate Change Canada	ECCC
Environmental Assessment	EA
Environmental Compliance Approval	ECA
Fisheries and Oceans Canada	DFO
Garden River First Nation	GRFN
Health Canada	HC
Impact Assessment Agency of Canada	IAAC
Kilometres	km
Liquified or compressed natural gas	LNG
Master of Science	M.Sc.
Metal and Diamond Mining Effluent Regulations	MDMER
Métis Nation of Ontario	MNO
Michipicoten First Nation	MFN
Million tonnes	Mt
Missanabie Cree First Nation	MCFN
Natural Resources Canada	NRCan
Nitrogen dioxide	NO ₂
Ontario Ministry of the Environment, Conservation and Parks	MECP
Master of Engineering Science	M.E.Sc.
Ontario Ministry of Natural Resources	MNR
Particulate matter	PM
Photoionization detector	PID
Professional Engineer	P. Eng.
Professional Geoscientist	P. Geo.
Protection of Aquatic Life	PAL
Red Sky Métis Independent Nation	RSMIN
Sulphur dioxide	SO ₂
Total suspended particulates/particles	TSP
Transport Canada	TC

EXECUTIVE SUMMARY - ENGLISH

Alamos Gold Inc. (Alamos) operates Magino Mine (the Project), located approximately 40 kilometers northeast of Wawa, Ontario, in Finan Township, Algoma District. The site is accessed via Goudreau Road from the Township of Dubreuilville. The Project includes the construction, operation and closure of an open pit gold mine, with approximately 150 million tonnes (Mt) of ore and approximately 430 Mt of mine rock and associated infrastructure. Under Prodigy Gold, a subsidiary of Argonaut Gold Inc., the Project began construction on February 19, 2021, and commercial production began November 1, 2023. On July 12, 2024, Alamos Gold Inc. acquired Prodigy Gold, and continued operations at Magino Mine as part of its greater Island Gold District operations.

Federal environmental assessment (EA) approval for the Project was received via the Decision Statement issued on January 24, 2019, which was subsequently amended August 23, 2023, and again July 26, 2024. This Annual Report is submitted in compliance with condition 2.9 of the EA Decision Statement. It details Alamos' activities related to each of the conditions in the EA Decision Statement during the reporting period of January 1 to December 31, 2025.

As described further in this Annual Report, notable aspects of the Project in 2025 related to the Decision Statement conditions include:

- **Sampling and Monitoring:**
 - Sampling/ monitoring of groundwater, surface water, sediment and air was conducted and analyzed for parameters of ecological value and interest to human health.
 - This included the implementation of Cycle 2 of the Environmental Effects Monitoring program which incorporated a new weight-of-evidence approach (holistic, ecosystem-based assessment) to determine effluent effects and potential influence on the receiving environment.
 - Wildlife observations were tracked, including bears, moose, snapping turtles, as well as migratory birds and their use of water bodies.
 - Two migratory bird surveys were conducted within the breeding window, focusing on dawn breeding birds, marsh birds and nocturnal birds.
 - The majority of sampling/ monitoring results continued to indicate there are no Project related adverse environmental effects requiring additional mitigation.

- **Indigenous Relations**
 - Engaged with Indigenous groups throughout the year at monthly and quarterly meetings.
 - Archeological studies for the haul road and historic Goudreau pits were conducted in 2025 which found no previously unidentified structures, sites, or things of historical, archaeological, paleontological or architectural significance.
 - Alamos agreed to protect Manitou Mountain from exploration, a historically significant spiritual location to the Missanabie Cree First Nation community.
 - In partnership with Batchewana First Nation, Alamos started the construction of a 115kV powerline to bring electrical power to the Project from the grid, which will reduce the Project's greenhouse gas footprint. The line will be owned by Batchewana First Nation upon completion.

SOMMAIRE / EXECUTIVE SUMMARY – FRANÇAIS

Alamos Gold Inc. (Alamos) exploite la mine Magino (le Projet), située à environ 40 kilomètres au nord-est de Wawa, en Ontario, dans le canton de Finan, district d'Algoma. Le site est accessible par la route Goudreau depuis le canton de Dubreuilville. Le Projet comprend la construction, l'exploitation et la fermeture d'une mine d'or à ciel ouvert, avec environ 150 millions de tonnes (Mt) de minerai et environ 430 Mt de roche de mine et d'infrastructures associées. Sous Prodigy Gold, une filiale d'Argonaut Gold Inc., la construction du Projet a commencé le 19 février 2021 et la production commerciale a débuté le 1er novembre 2023. Le 12 juillet 2024, Alamos Gold Inc. a acquis Prodigy Gold et a poursuivi les opérations à la mine Magino dans le cadre de ses opérations plus vastes dans le district Island Gold.

L'approbation fédérale de l'évaluation environnementale (EE) pour le Projet a été reçue par l'entremise de la Déclaration de décision émise le 24 janvier 2019, qui a été par la suite modifiée le 23 août 2023 et de nouveau le 26 juillet 2024. Ce Rapport annuel est soumis conformément à la condition 2.9 de la Déclaration de décision de l'EE. Il détaille les activités d'Alamos en lien avec chacune des conditions de la Déclaration de décision de l'EE durant la période de rapport du 1er janvier au 31 décembre 2025.

Comme décrit plus en détail dans ce rapport annuel, les aspects remarquables du projet en 2025 liés aux conditions de la Déclaration de décision comprennent:

- Échantillonnage et surveillance:
 - L'échantillonnage/la surveillance des eaux souterraines, des eaux de surface, des sédiments et de l'air a été effectué et analysé pour des paramètres ayant une valeur écologique et un intérêt pour la santé humaine.
 - Cela comprenait la mise en œuvre du Cycle 2 du programme de Surveillance des Effets Environnementaux, qui intégrait une nouvelle approche de l'ensemble des preuves (évaluation holistique et basée sur l'écosystème) pour déterminer les effets des effluents et leur influence potentielle sur l'environnement récepteur.
 - Les observations de la faune ont été suivies, incluant les ours, les orignaux, les tortues serpents, ainsi que les oiseaux migrateurs et leur utilisation des plans d'eau.
 - Deux relevés d'oiseaux migrateurs ont été effectués pendant la période de reproduction, en mettant l'accent sur les oiseaux reproducteurs à l'aube, les oiseaux des marais et les oiseaux nocturnes.
 - La majorité des résultats d'échantillonnage/de surveillance ont continuellement indiqué qu'il n'y a pas d'effets environnementaux négatifs liés au Projet nécessitant des mesures d'atténuation supplémentaires.
- Relations autochtones:
 - Engagé avec les groupes autochtones tout au long de l'année lors de réunions mensuelles et trimestrielles.
 - Des études archéologiques pour la route de transport et les anciennes carrières Goudreau ont été menées en 2025 et n'ont révélé aucune structure, site ou objet d'importance historique, archéologique, paléontologique ou architecturale jusque-là inconnu.
 - Alamos a accepté de protéger la montagne Manitou contre l'exploration, un lieu spirituel historiquement significatif pour la communauté des Premières Nations Missanabie Cree.
 - En partenariat avec la Première Nation Batchewana, Alamos a commencé la construction d'une ligne électrique de 115 kV pour amener l'électricité au projet depuis le réseau, ce qui réduira l'empreinte carbone du projet. La ligne appartiendra à la Première Nation Batchewana une fois terminée.

1. INTRODUCTION

Alamos Gold Inc. (Alamos) operates Magino Mine (the Project), located approximately 40 kilometers northeast of Wawa, Ontario, in Finan Township, Algoma District. The site is accessed via Goudreau Road from the Township of Dubreuilville. Figure 1 shows the location of the Project. Alamos' Island Gold Mine is located directly to the east. The Project includes the construction, operation and closure of an open pit gold mine, with approximately 150 million tonnes (Mt) of ore and approximately 430 Mt of mine rock, and associated infrastructure. Under Prodigy Gold, a subsidiary of Argonaut Gold Inc., the Project began construction on February 19, 2021, and commercial production began November 1, 2023. On July 12, 2024, Alamos Gold acquired Prodigy Gold, and continued operations at Magino Mine as part of its greater Island Gold District operations.

Federal environmental assessment (EA) approval for the Project was received via the Decision Statement issued on January 24, 2019, which was subsequently amended August 23, 2023, and again July 26, 2024. The Statement of Completion (Category B) made under the Ontario Ministry of Natural Resources and Forestry's (MNRF's) Class Environmental Assessment for Resource Stewardship and Facility Development Projects (or Class EA-RSFD) for the Project was issued on March 12, 2019.

This Annual Report is submitted in compliance with condition 2.9 of the EA Decision Statement. It details Alamos' activities related to each of the conditions in the EA Decision Statement during the reporting period of January to December 2025. The report is organized so that each section heading addresses a set of conditions as they are laid out in the EA Decision Statement.

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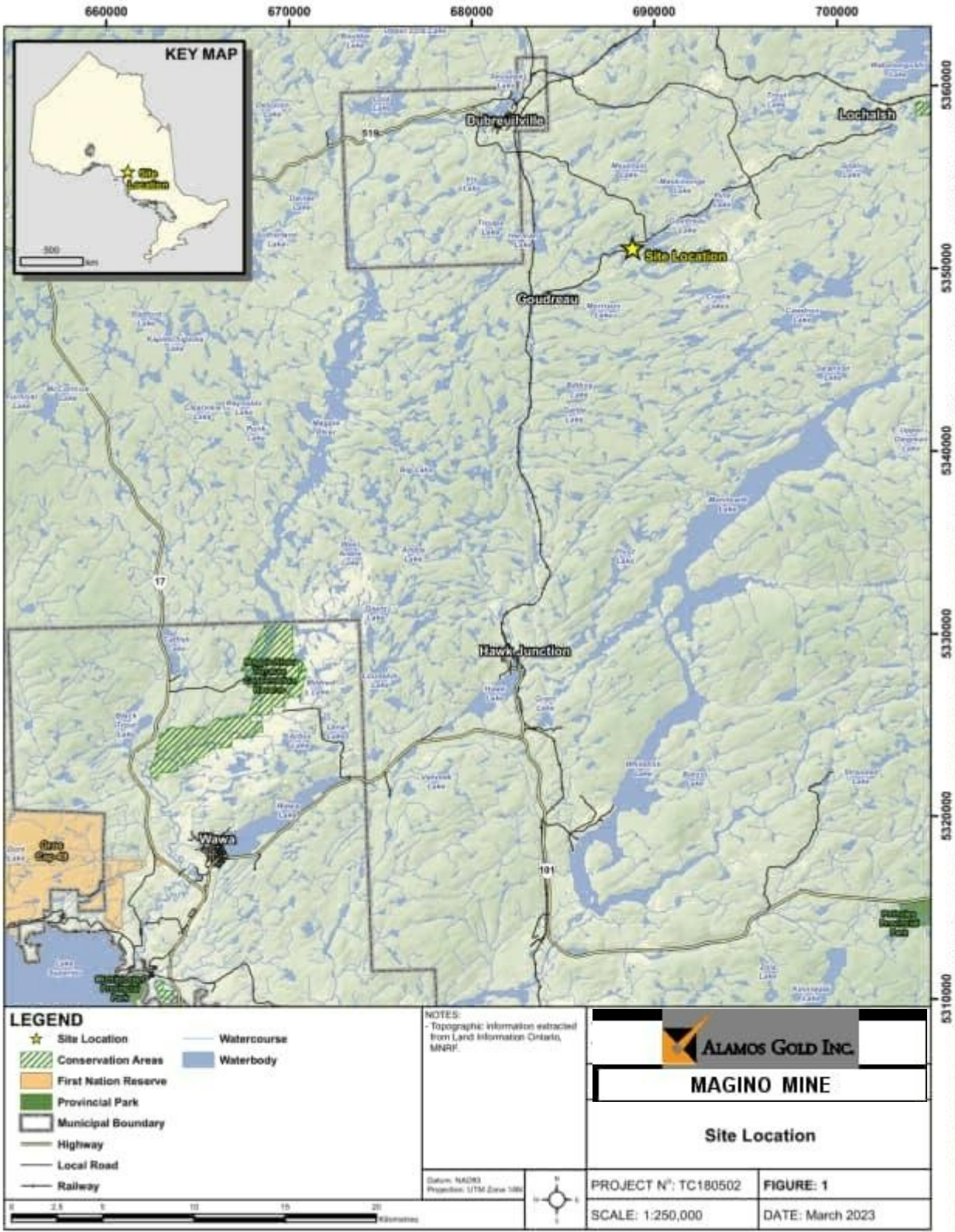


Figure 1: Magino Mine Project Location

2. CONDITIONS AND COMPLIANCE REPORTING

This section provides a description of the activities taken by Alamos in 2025 to comply with the conditions of the federal EA Decision Statement for the Project (original January 24, 2019, last amended July 2024).

A. General Conditions

A-1 Qualified Individuals / Best Practices

2.1 The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge available at the time the Proponent takes action, including community and Indigenous traditional knowledge, are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies.

Response: Alamos continued to engage the services of several reputable consulting companies in 2025 to provide the qualified professionals (e.g., Professional Geoscientist (P. Geo.), Professional Engineer (P. Eng.), Certified Engineering Technologists (C.E.T.), and individuals holding a Master of Engineering Science (M.E.Sc.) or a Master of Science (M.Sc.)) to implement and/or supervise all activities according to requirements. Alamos also continued discussions with Indigenous groups, including Michipicoten First Nation (MFN), Missanabie Cree First Nation (MCFN), Métis Nation of Ontario (MNO), Batchewana First Nation (BFN), Red Sky Métis Independent Nation (RSMIN), and Garden River First Nation (GRFN) in 2025 (collectively referred to as “Indigenous groups” throughout this report), regarding the Project’s ongoing environmental performance.

A-2 Consultation

2.2 The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement:

2.2.1 provide a written notice of the opportunity for the party or parties being consulted to present their views and information on the subject of the consultation;

2.2.2 provide all information available and relevant on the scope and the subject matter of the consultation and a period of time taking into account the views of the party or parties being consulted, not to be less than 15 days, to prepare their views and information;

2.2.3 undertake an impartial consideration of all views and information presented by the party or parties being consulted on the subject matter of the consultation; and

2.2.4 advise in a timely manner the party or parties being consulted on how the views and information received have been considered by the Proponent.

2.3 The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this Decision Statement, communicate with each Indigenous group with respect to the manner to satisfy the consultation requirements referred to in condition 2.2, including methods of notification, the type of information and the period of time to be provided when seeking input, the process to be used by the Proponent to undertake impartial consideration of all views and information presented on the subject of the consultation, and the period of time and the means to advise Indigenous groups of how their views and information were considered by the Proponent.

Response: Alamos (previously Prodigy) conducted extensive consultations in 2020 with Indigenous groups and provincial and federal government departments to develop the follow-up programs, plans and measures required by the various EA conditions. All views and information presented during consultation meetings were considered and were either addressed in the meeting or by follow-up email. Finalized documents were provided to consulted parties in 2021.

While formal consultations were not required for the EA conditions or any other Project works in 2025, Alamos continued to meet quarterly to monthly (where possible) with Indigenous groups to discuss the Project’s ongoing

environmental performance and the implementation of the individual Benefits Agreements. A SharePoint site is used by all parties to provide and update related documentation, as well as to keep records of participation and attendance.

A-3 Follow-up and Adaptive Management

2.4 The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, determine, as part of the development of each follow-up program and in consultation with the party or parties being consulted during the development, the following information:

2.4.1 the methodology, location, frequency, timing and duration of monitoring associated with the follow-up program;

2.4.2 the scope, content and frequency of reporting of the results of the follow-up program;

2.4.3 the levels of environmental change relative to baseline conditions that would require the Proponent to implement modified or additional mitigation measure(s), including instances where the Proponent may require Designated Project activities to be stopped; and

2.4.4 the technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change referred to in condition 2.4.3 have been reached or exceeded and the timing for implementing the modified or additional mitigation measures.

2.5 The Proponent shall maintain the information referred to in condition 2.4 during the implementation of each follow-up program in consultation with the party or parties being consulted during the development of each follow-up program.

2.6 The Proponent shall provide the follow-up programs referred to in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3 to the Agency and to the party or parties being consulted during the development of each follow-up program prior to the implementation of each follow-up program. The Proponent shall also provide any update(s) to the Agency and to the party or parties being consulted during the development of each follow-up program within 30 days of the follow-up program being updated.

Response: Alamos (previously Prodigy) developed, in consultation with Indigenous groups and relevant authorities, draft follow-up programs as part of various Project-specific environmental management plans, incorporating the requirements of EA condition 2.4. They were finalized in January 2021 and provided to consulted parties in January and March 2021, prior to their implementation.

The Surface Water Monitoring Plan and Groundwater Monitoring Plan were subsequently updated in March 2023 as part of the site's application to amend the provincial ECA for Industrial Sewage Works (2066-CQLN6X). The monitoring program was updated for 2025 following a federal Environmental Effects Monitoring pre-design study conducted in Otto Lake in 2024, the results from which informed Cycle 2 of the monitoring program which uses a new weight-of-evidence approach (holistic, ecosystem-based assessment) to determine effluent effects and potential influence on the receiving environment. Updates to the Surface Water Monitoring Plan may be made depending on the results of the 2025 and 2026 sampling. Otherwise, there have been no further changes to the follow-up programs, nor to the broader environmental management plans, since their creation.

As the Project continues to transition from the Construction Environment Management Plan to an Operations Environment Management Plan, and as Alamos incorporates Magino Mine into its greater Island Gold District operations, these and other plans including the follow-up programs, will be reviewed and updated, as applicable. Alamos is committed to communicating and discussing these changes with Indigenous groups, the Agency and other relevant authorities, as well as providing draft versions of the management documents for comment prior to finalizing.

2.7 The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement and in consultation with the party or parties being consulted during the development of the follow-up program:

2.7.1 conduct the follow-up program according to the information determined pursuant to condition 2.4;
2.7.2 undertake monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure(s);
2.7.3 determine whether modified or additional mitigation measures are required based on the monitoring and analysis undertaken pursuant to condition 2.7.2; and
2.7.4 if modified or additional mitigation measures are required pursuant to condition 2.7.3, develop and implement these mitigation measures in a timely manner and monitor them pursuant to condition 2.7.2.

Response: As described in subsequent sections in this report, Alamos implemented the follow-up programs required by EA conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3 throughout 2025 as required. The results of most of the follow-up programs did not indicate that additional measures or changes to the programs were required, with the following exception:

- As part of the follow-up program for EA condition 3.18, elevated nitrate concentrations were measured in the Water Quality Control Pond. Alamos trialed a bench scale water treatment system to explore the use of micro-C, a natural compound that uses biological processes to break down nitrates in water. A larger scale, portable treatment system was later installed in the Lovell Lake Treatment Pond where the outflow into the greater water management system can be controlled to provide sufficient residence time for the breakdown of nitrates. Further studies are planned for 2026 to optimize the system with the intention of installing a permanent water treatment plant in the future. As the main source of nitrates in the water is from the use of explosives for blasting, Alamos is also investigating opportunities to improve the blasting process and/or reduce the use of nitrate containing explosives.

Details of all the follow-up programs are provided in subsequent sections of this Annual Report.

2.8 Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss with each Indigenous group opportunities for their participation in the development and implementation of the follow-up program, including the analysis of the follow-up results and whether modified or additional mitigation measures are required, as set out in condition 2.7.

Response: Alamos meets quarterly to monthly with Indigenous groups, where possible, to discuss the Project's ongoing environmental performance including the results of the follow-up programs required by the EA conditions. There were no related issues noted from the Indigenous groups in 2025.

A-4 Annual Reporting

2.9 The Proponent shall, commencing in the reporting year during which the Proponent begins the implementation of the conditions set out in this Decision Statement, prepare an annual report that sets out:

2.9.1 the activities undertaken by the Proponent in the reporting year to comply with each of the conditions set out in this Decision Statement;

2.9.2 how the Proponent complied with condition 2.1;

2.9.3 for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation;

2.9.4 the information referred to in conditions 2.4 and 2.5 for each follow-up program;

2.9.5 the results of the follow-up program requirements identified in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3;

2.9.6 any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.7;

2.9.7 any change(s) to the Designated Project in the reporting year for which the Proponent determined that condition 2.14 did not apply.

2.10 The Proponent shall submit to the Agency the annual report referred to in condition 2.9, including a plain language executive summary in both official languages, no later than March 31 following the reporting year to which the annual report applies.

Response: This Annual Report provides the information required by EA conditions 2.9 and 2.10 of the federal EA Decision Statement issued on January 24, 2019, last amended on July 26, 2024.

With respect to EA condition 2.9.7, the following changes, to which Alamos has determined EA condition 2.14 does not apply, were implemented at the Project:

- **New Haul Road:** Construction continued on the new haul road connecting Magino Mine to Alamos' adjacent Island Gold Mine. The road construction includes not only the surface road, but also underlying tailings distribution lines.
- **Mill Expansion:** Construction progressed on the building infrastructure for the mill expansion. Alamos also conducted trials at the existing Magino Mine's mill with Island Gold Mine ore (a higher grade ore than the Magino Mine's mill was originally designed for) to inform the process design of the mill expansion.
- **Truck Shop:** Started construction on a new Truck Shop to service on-site equipment.
- **Expansion of the Tailings Management Facility:** Phase 2 dam raises progressed, using on-site waste rock. The expanded storage area is required to accept the increased amount of tailings expected once the mill expansion is complete and Island Gold's ore can be processed there.
- **Water Treatment Plant:** Alamos trialed the use of a biological compound to reduce the elevated nitrate concentrations measured in the Water Quality Control Pond. Further studies are planned for 2026, with the intention of installing a permanent water treatment plant in the future.
- **Transmission Line:** In partnership with Batchewana First Nation, construction began on the 115kV transmission line from Hawk Junction to the Project site. Upon completion, the line will be owned by Batchewana First Nation and will allow the Project to reduce its dependence on fuel-based energy generation.

There were no changes in 2025 that caused the Project to be carried out in a manner other than that described in EA condition 1.7 (Designated Project). There were no additional adverse environmental effects identified associated with this change relative to the original environmental assessment.

A-5 Information Sharing

2.11 The Proponent shall publish on the Internet, or any medium which is publicly available, the annual reports and the executive summaries referred to in conditions 2.9 and 2.10, the offsetting plan(s) referred to in condition 3.14, the reports related to accidents and malfunctions referred to in conditions 8.4.2 and 8.4.3, the communication plans referred to in conditions 6.1 and 8.5, the schedules referred to in conditions 9.1, and 9.2, and any update(s) or revision(s) to the above documents, upon submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available for 25 years following the end of operation, or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall notify the Agency and Indigenous groups of the availability of these documents within 48 hours of their publication.

Response: Alamos makes all versions of the documentation required by EA condition 2.11 accessible to the public upon request at their offices in Dubreuilville and Toronto, Ontario:

Magino Mine Office
12 Goudreau Road
Dubreuilville, Ontario
P0S 1B0

Island Gold District Office
21 Rue des Pins
P.O. Box 309
Dubreuilville, Ontario
P0S 1B0

Toronto Office
181 Bay Street, Suite 3910
Toronto, Ontario
M5J 2T3

The public can also contact Alamos (info@alamosgold.com or 1-866-788-8801) to request the documentation. This contact information is provided on the public website alamosgold.com.

The documentation is provided directly to the Agency and Indigenous groups either annually (annual reports, executive summaries and schedules), as/when they are updated (communication plan(s) and offsetting plan(s)), or within the reporting deadlines for incidents (accident and malfunction reports).

2.12 When the development of a plan is a requirement of a condition set out in this Decision Statement, the Proponent shall submit the plan to the Agency prior to construction, unless otherwise required through the condition.

Response: The offsetting plan referred to in EA condition 3.14 and draft communication plans referred to in EA conditions 6.1 and 8.5 were submitted to the Agency in 2020, prior to construction. The final communication plans were provided to the Agency in January 2021, prior to construction. There have been no further updates to any plan.

A-6 Change of Proponent

2.13 The Proponent shall notify the Agency and Indigenous groups in writing no later than 30 days after the day on which there is a transfer of ownership, care, control or management of the Designated Project in whole or in part.

Response: The original proponent of the Project was Prodigy Gold Inc, a subsidiary of Argonaut Gold. On July 12, 2024, Alamos Gold Inc. acquired Prodigy Gold Inc. The Agency was notified August 9, 2024. Alamos Gold Inc. operated Magino Mine under Prodigy Gold Inc, a subsidiary of Alamos Gold Inc. through 2024. Beginning in 2025, Alamos Gold Inc. operated Magino Mine directly. Magino Mine is operated as part of the “Island Gold District” which includes both Magino Mine and Alamos’ adjacent Island Gold Mine underground operation. There was no change of proponent in 2025.

A-7 Change to the Designated Project

2.14 If the Proponent is proposing to carry out the Designated Project in a manner other than described in condition 1.7, the Proponent shall notify the Agency in writing in advance of carrying out the proposed activities. As part of the notification, the Proponent shall provide:

2.14.1 a description of the proposed change(s) to the Designated Project and the environmental effects that may result from the proposed change(s);

2.14.2 any modified or additional measure to mitigate any environmental effect that may results from the proposed change(s) and any modified or additional follow-up requirement; and

2.14.3 an explanation of how, taking into account any modified or additional mitigation measure referred to in condition 2.14.2, the environmental effects that may result from the proposed change(s) may differ from the environmental effects of the Designated Project identified during the environmental assessment.

2.15 The Proponent shall provide the Agency any additional information required by the Agency about the proposed change(s) referred to in condition 2.14, which may include the results of consultation with Indigenous groups and relevant authorities on the proposed change(s) and environmental effects referred to in condition 2.14.1 and the modified or additional mitigation measures and follow-up requirements referred to in condition 2.14.2.

Response: As indicated in sub-section A-4, there were no changes to the Project in 2025 to which EA condition 2.14 applied.

B. Fish and Fish Habitat

3.1 The Proponent shall develop, prior to construction, and implement, during all phases of the Designated Project, measures to control erosion and sedimentation within the project study area. The Proponent shall submit these measures to the Agency before implementing them. Among other measures, the Proponent shall:

3.1.1 Use ditches and diversion berms to maintain stream bank stability; and

3.1.2 Use physical barriers to reduce runoff from disturbed areas.

Response: In 2021, Alamos (previously Prodigy) developed the Sediment and Erosion Control Plan and submitted it to the Agency. Ongoing sediment and erosion control measures, including the use of ditches, diversion berms, sumps, and physical barriers such as sandbag barriers to enforce existing structures, were implemented in 2025 as required. Where applicable, these measures are part of the ongoing discussions with the DFO to finalize the Offset Plan and its implementation timelines.

3.2 The Proponent shall comply with the Metal and Diamond Mining Effluent Regulations and the pollution prevention provisions of the Fisheries Act.

Response: Alamos complied with the Metal and Diamond Mining Effluent Regulations (MDMER) throughout 2025. In 2025, there were no emergency effluent discharges via the permitted emergency discharge points at Lovell Lake Treatment Pond and Waterbody 3 Treatment Pond, and all effluent was discharged via the registered discharge point at Otto Lake via the Water Quality Control Pond. Effluent monitoring was conducted and reported per the site's provincial ECA for Industrial Sewage Works (2066-CQLN6X). Additionally, Alamos conducted biological monitoring in the receiving water bodies as part of implementing Cycle 2 of the Environmental Effects Monitoring program which incorporated a new weight-of-evidence approach (holistic, ecosystem-based assessment) to determine effluent effects and potential influence on the receiving environment.

3.3 The Proponent shall collect, during construction and operation, contact water for reuse in Designated Project activities, and treat excess contact water that cannot be reused.

3.4 The Proponent shall control the flow at which excess water referred to in condition 3.3 is discharged to limit disturbance of lake bed material.

Response: Contact water is managed within the Project's overall water management system which directs contact water through a series of ponds and ditches towards the Water Quality Control Pond. There is a passive wetland treatment system upstream of the Water Quality Control Pond, and if there is no incoming water to the Water Quality Control Pond, the water is recirculated through the passive wetland treatment system to maximize its effectiveness.

Excess waters are directed to the Water Quality Control Pond, which then is discharged into Otto Lake. To limit disturbance of lakebed material, three siphon lines are used to provide low pressure conveyance of the waters and the outlets have diffusers.

In 2025, following elevated nitrate concentration measurements in the Water Quality Control Pond, Alamos trialed a bench scale water treatment system to explore the use of micro-C, a natural compound that uses biological processes to break down nitrates in water. A larger scale, portable treatment system was later installed in the Lovell Lake Treatment Pond where the outflow into the greater water management system can be controlled to provide sufficient residence time for the breakdown of nitrates. Further studies are planned for 2026 to optimize the system with the intention of installing a permanent water treatment plant in the future. During this period, Alamos maintained transparency with its regulators and held back discharging to Otto Lake until nitrate concentrations were acceptable.

Water management at the Project maximizes the reuse and recycling of industrial water in the milling and tailings management facility circuit, under a closed-loop system that minimizes freshwater makeup requirements. In 2025, make-up water required for the processing facilities was provided primarily from the tailings management facility as well as from construction dewatering activities, primarily from Goudreau Sump A which will be part of the future fish compensation area.

3.5 The Proponent shall install, prior to operation, and use a cyanide destruction circuit during operation to reduce cyanide concentrations in tailings before the tailings are directed to the tailings management facility.

Response: Since the startup of the processing plant in June 2023, a cyanide destruction circuit using sulphur dioxide gas has been used at the mill to reduce cyanide concentrations in tailings.

3.6 The Proponent shall, after the end of operation and until the open-pit lake is filled, collect and direct contact water to the open-pit lake.

Response: As the Project was in operations phase in 2025, there was no specific action for EA condition 3.6 in 2025.

3.7 The Proponent shall, prior to operation, implement seepage control measures at the tailings management facility and maintain these measures during operation and decommissioning.

Response: The design of the tailings management facility includes seepage control measures. Construction of the seepage control measures began in 2022 and were completed prior to the start of the operations phase in 2023. Since tailings deposition began in 2023, seepage signatures were noted in adjacent contact water ponds and ditches of the mine water management system, which eventually report to the Water Quality Control Pond. Construction dewatering of the tailings management facility as construction of the Phase 2 dams began in 2025 compounded the issue. To mitigate the impact on the final effluent water quality, seepage is actively pumped from the Waterbody 3 Treatment Pond back into the tailings management facility, and tailings deposition is directed to reinforce the areas where seepage is suspected. In 2025, tailings discharge spigots were installed around the perimeter to build up the beaches which has resulted in reduced recharge rates to Waterbody 3 Treatment Pond, however seepage signatures were still noted at the toe of the tailings management facility and Waterbody 3 Treatment Pond, and so investigations and mitigations are ongoing.

3.8 The proponent shall not connect the open-pit lake until such time as water in the open-pit lake complies with the pollution prevention provisions of the Fisheries Act.

Response: Connecting the open-pit lake will take place during the Project's closure phase. As the Project was in operations phase in 2025, there was no specific action for EA condition 3.8 in 2025.

3.9 The Proponent shall treat water taking into account the Canadian Council of Ministers of the Environment's Canadian Water Quality Guidelines for Protection of Aquatic Life.

Response: The CCME's Canadian Water Quality Guidelines for Protection of Aquatic Life (PAL) were taken into consideration in the development of the discharge criteria for the provincial ECA for Industrial Sewage Works (2066-CQLN6X). Effluent is discharged via the final discharge point at the Water Quality Control Pond following the upstream passive wetland treatment system and a retention period in the Water Quality Control Pond itself.

In 2025, following elevated nitrate concentration measurements in the Water Quality Control Pond, Alamos trialed a bench scale water treatment system to explore the use of micro-C, a natural compound that uses biological processes to break down nitrates in water. A larger scale, portable treatment system was later installed in the Lovell Lake Treatment Pond where the outflow into the greater water management system can be controlled to provide sufficient residence time for the breakdown of nitrates. Further studies are planned for 2026 to optimize the system with the intention of installing a permanent water treatment plant in the future. During this period, Alamos maintained transparency with its regulators and held back discharging to Otto Lake until nitrate concentrations were acceptable.

Additional active treatment (e.g. chemical dosing) will be considered if effluent water quality monitoring indicates there is a requirement.

3.10 The Proponent shall develop, prior to the start of blasting activities in or near water and in consultation with Indigenous groups, and implement, during blasting activities in or near water, mitigation measures to avoid or prevent adverse effects to fish and fish habitat from the use of explosives in a manner consistent with the Fisheries Act and its regulations. When developing these measures, the Proponent shall take into account Fisheries and Oceans Canada's Measures to avoid causing harm to fish and fish habitat including aquatic species to risk as it pertains to the use of explosives in or near water. The Proponent shall submit these measures to the Agency before implementing them.

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups, draft mitigation measures to avoid or prevent adverse effects to fish and fish habitat from the use of explosives. They were finalized and provided to the Agency in January 2021.

3.11 The Proponent shall conduct in-water construction activities during timing windows of least risk for the area, unless otherwise agreed to by relevant federal and provincial authorities. If in-water construction

activities cannot be conducted during identified timing windows of least risk, the Proponent shall develop and implement additional mitigation measures, in consultation with Indigenous groups and Fisheries and Oceans Canada, to protect fish during sensitive life stages.”

Response: In 2025, there were no in-water construction activities for the Project.

3.12 The Proponent shall salvage and relocate fish prior to conducting any Designated Project activity requiring removal of fish habitat in a manner consistent with any license issued under the Fisheries Act and its regulations. The Proponent shall salvage and relocate fish in consultation with Indigenous groups and to the satisfaction of Fisheries and Oceans Canada and other relevant authorities.

Response: Fish salvage activities were completed in 2022 under DFO Authorization 20-HCAA-02291 which was issued following consultations with Indigenous groups. No fish salvage activities have occurred since. Fish salvage activities may be required when Alamos constructs the flood control berm for Waterbody 10 currently included in the 2027 work related to fish compensation activities at Goudreau Lake, but may it be re-prioritized for 2026 depending on logistics.

3.13 The Proponent shall design, install and operate the water intake structures in Goudreau Lake in a manner which reduces the incidental capture of fish by entrainment and impingement through the use of an appropriately sized fish screen, taking into account Fisheries and Oceans Canada's Freshwater Intake End-of-Pipe Fish Screen Guideline and in a manner consistent with the Fisheries Act and its regulations.

Response: The design of the end-of-pipe fish screen for the Goudreau Lake water intake conformed to the DFO's Guideline, the Fisheries Act and its regulations, and the piping was installed in 2023. Since the current Permit to Take Water (0121-CCXHDL) does not allow water taking from Goudreau Lake, the Project has moved the pumphouse and much of the piping to the fish habitat sump south of Goudreau Lake. If a new Permit to Take Water is not in place once the area becomes fish habitat, Alamos will consider moving the pumphouse to the Water Quality Control Pond for raw water sourcing. The intake pipe and end-of-pipe fish screen was left in Goudreau Lake for potential later use.

3.14 The Proponent shall develop, to the satisfaction of Fisheries and Oceans Canada and Environment and Climate Change Canada and in consultation with Indigenous groups, any offsetting plan(s) related to any residual serious harm to fish associated with the carrying out of the Designated Project. The Proponent shall implement the plan. The Proponent shall submit any approved offsetting plan(s) to the Agency prior to implementation.”

3.15 The Proponent shall, for any fish habitat offsetting measure(s) proposed in any offsetting plan(s) referred to in condition 3.14 that may cause adverse environmental effects not considered in the environmental assessment, develop and implement, following consultation with Indigenous groups, Fisheries and Oceans Canada and Environment and Climate Change Canada, measures to mitigate those effects. The Proponent shall submit these measures to the Agency before implementing them.

Response: In 2019, Alamos (previously Prodigy) developed the Fish Habitat Compensation Plan/ Offset Plan. It was developed in coordination with the DFO, MNR, and ECCC, in consultation with Indigenous groups, and in compliance with the requirements for both the MDMER Schedule 2 Fish Habitat Compensation Plan and Fisheries Act Paragraph 35(2)(b) Authorization Offset Plan. Approval of the Schedule 2 authorization was received from the Governor in Council in 2020. The Plan was submitted as part of the Fisheries Act authorization application process in 2020. The Plan was provided to the Agency in November 2020.

The Plan describes measures to mitigate potential impacts arising from the implementation of the Plan, and authorization received under the Fisheries Act requires monitoring and reporting of the effectiveness of the implementation of the Plan. No additional adverse environmental effects not considered in the EA were identified for fish habitat offsetting measures.

Prodigy began implementing the plan in 2021, submitting annual monitoring reports to the DFO. In 2022 and 2023, Prodigy substantially completed the McVeigh Creek diversion and Spring Lake extension and commenced construction of the upland portion of the Goudreau Lake basin fish habitat area. The construction of the downstream connection to Goudreau Lake had been planned to begin in 2024, however, as reported in the 2024 annual

monitoring report (ERM, 2025), the work was not completed due to obstacles in achieving the required area, morphological characteristics and adequate flows. Shallow bedrock has impeded the ability to achieve the design volume, depth, and connectivity of the offset habitats. Further review of the completed works and engagement with the DFO will be required to determine the achieved extent of the offset habitat targets and establish an adapted strategy, plan and schedule. In 2025, Alamos submitted a request to approve changes to the implementation timelines within the Offset Plan.

As the Offset Plan is updated, as well as any associated updates to environmental management plans or follow-up programs, they will be communicated to the Agency, Indigenous Groups and relevant authorities prior to finalizing.

3.16 The Proponent shall develop, prior to the start of blasting activities in or near water and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat, including spawning habitat, caused by blasting.

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Fish and Fish Habitat Management Plan and Surface Water Monitoring Plan. They were finalized in January 2021 and provided to consulted parties in January and March 2021. The Surface Water Monitoring Plan was subsequently updated in March 2023. The monitoring program was updated in 2025, following a federal Environmental Effects Monitoring pre-design study conducted in Otto Lake in 2024, the results from which informed Cycle 2 of the monitoring program which uses a new weight-of-evidence approach (holistic, ecosystem-based assessment) to determine effluent effects and potential influence on the receiving environment. Updates to the Surface Water Monitoring Plan may be made depending on the results of the 2025 and 2026 sampling.

3.16 (continued) The Proponent shall implement the follow-up program during blasting activities. As part of the implementation of the follow-up program, the Proponent shall:

3.16.1 Monitor instantaneous pressure and particle velocity during the first blasting event;

3.16.2 If results of the monitoring referred to in condition 3.16.1 indicate an instantaneous pressure change greater than 100 kiloPascals in the swimbladder of fish or that blasting produces a peak particle velocity greater than 13 millimetre per second in a spawning bed, develop, prior to the next blasting event and in consultation with relevant authorities, modified or additional mitigation measures pursuant to condition 2.7 in order to protect fish and fish habitat, including spawning habitat; and

3.16.3 Implement the modified or additional mitigation measures referred to in condition 3.16.2 during all subsequent blasting events. The Proponent shall submit these measures to the Agency before implementing them.

Response: Alamos (previously) Prodigy carried out monitoring during the first blasting event in the open pit on April 20, 2021. No pressure or particle velocity issues that could impact the health of fish were identified, such that modified/ additional mitigations were not developed or implemented for subsequent blasts in the open pit. Prodigy did not carry out blasting near fish or fish habitat in 2022. In February 2023, Prodigy conducted a blast associated with the fish habitat construction. Hydrophone measurements were less than 10kPa, indicating no impact to the health of fish. In 2025, Alamos did not conduct any new monitoring as conditions weren't significantly different from the monitored blast in 2021.

3.17 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures for the salvage and relocation of fish and as it pertains to the incidental capture of fish by entrainment and impingement from the Designated Project. The Proponent shall implement the follow-up program during all phases of the Designated Project.

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Fish and Fish Habitat Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021.

The water bodies where water-taking occurred in 2025 were deemed clear of fish (salvaged to regulatory standards) and so it was not necessary to implement the follow-up program.

3.18 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects on fish and fish habitat caused by changes in water and sediment quality in Otto Lake and Herman Lake.

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Surface Water Monitoring Plan (Appendix 6-D of the Water Management Plan). It was finalized January 2021 and provided consulted parties in January and March 2021. It was subsequently updated in March 2023. The monitoring program was updated for 2025 following a federal Environmental Effects Monitoring pre-design study conducted in Otto Lake in 2024, the results from which informed Cycle 2 of the monitoring program which uses a new weight-of-evidence approach (holistic, ecosystem-based assessment) to determine effluent effects and potential influence on the receiving environment. Updates to the Surface Water Monitoring Plan may be made depending on the results of the 2025 and 2026 sampling.

3.18 (continued) The Proponent shall implement the follow-up program during all phases of the Designated Project, including the environmental effects monitoring requirements set out in Schedule 5 of the Metal and Diamond Mining Effluent Regulations. As part of the implementation of the follow-up program, the Proponent shall:

3.18.1 Monitor, at least quarterly, concentrations of total phosphorus, mercury, copper, silver, sulphate and ammonia in water during operation;

Response: Unless prevented by unsafe conditions, Alamos conducts monthly surface water sampling in Otto Lake (the immediate receiving waterbody for Magino Mine’s effluent) and Herman Lake (the next downstream waterbody) according to the Surface Water Monitoring Plan (Appendix 6-D of the Water Management Plan) and as required by the provincial ECA for Industrial Sewage Works (2066-CQLN6X). The following table presents the 2025 sampling results for the parameters specified in EA condition 3.18.1. Further information, including individual sample results, additional water quality parameters, and sampling for additional water bodies, is provided in the annual Surface Water Report generated as required by the provincial ECA for Industrial Sewage Works (2066-CQLN6X).

As presented in the following table, 2025 metals and ammonia levels have been relatively consistent since 2021 except sulphate which has increased since operations began. In 2025, there were several instances of measured parameters above the federal/provincial guidelines.

Water Quality		Number of Monthly Samples	Phosphorus	Mercury	Copper	Silver	Sulphate	Ammonia (un-ionized)
			mg/L	ng/L	mg/L	mg/L	mg/L	mg/L
Provincial Water Quality Objectives			0.02 (i)	200	0.005 (i)*	0.0001	n/a	0.02 (i)
CCME Water Quality Guidelines for Protection of Aquatic Life (Long term)			n/a	26	0.02	0.00025	n/a	0.019
2025 Samples - 75 th Percentile	OL-B	9	0.0105	0.713	0.00192	<0.00001	42.2	0.00945
	OL-F	6 + 1 Dup	0.0093	1.49	0.00137	<0.00001	87.9	0.0084
	HL-B	10 + 2 Dup	0.0112	1.025	0.00081	<0.00001	17.05	0.0024
	HL-B-In	10	0.0107	0.84	0.00089	<0.00001	22.15	0.0073
	HL-REF	10 + 6 Dup	0.0124	1.43	0.00275	0.000172	15.3	0.0016
	Instances above guideline		4 of PWQO	None	2 of PWQO	2 of PWQO	n/a	1 of PWQO
2024 Samples - 75 th Percentile (All OL and HL samples)		57	0.0099	0.860	0.00133	<0.00001	32.9	0.006
2023 Samples - 75 th Percentile (All OL and HL samples)		76	0.0086	1.185	0.00102	<0.00001	6.19	0.0005
2022 Sample - 75 th Percentile (All OL and HL samples)		90	0.0085	0.930	0.00075	0.000005	3.48	0.005**
2021 Samples - 75 th Percentile (All OL and HL samples)		87	0.0095	0.660	0.00148	0.000025	3.27	0.005**

CCME: Canadian Council of Ministers of the Environment

(i): interim objective

*: The objective for copper is 0.001mg/L if hardness is < 20mg/L; 0.005 if hardness is >20mg/L (which it was for every sample)

** A higher detection limit was used by the lab in 2021 and 2022 dataset, such that these values are not directly comparable (they are biased high).

3.18.2 Monitor, at least annually, concentrations of copper, arsenic, cadmium, manganese, mercury and total phosphorus in sediments during operation;

Response: Alamos has conducted annual sediment sampling in the receiving water body since 2021. As presented in the following table, the metal levels measured 2025 in the sediment samples collected in Otto Lake and Herman Lake (the receiving body for operations) were consistent with the metal levels in the sediment samples collected in Otto Lake and Herman Lake in 2024, and in Spring Lake in 2023 (the receiving body during construction), and are elevated compared with those measured in Otto Lake (OL samples), Herman Lake (HL samples) and Spring Lake in 2021 and 2022. As in 2023 and 2024, there were several exceedances of applicable sediment quality guidelines in the 2025 sampling, however, mean concentrations remained below PELs, above which adverse biological effects might be anticipated.

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Sediment Quality		Copper	Arsenic	Cadmium	Manganese	Mercury	Phosphorus
		mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Provincial Sediment Quality Guidelines	LEL	16	6	0.6	460	0.2	60
	SEL	110	33	10	1100	2	2000
CCME Sediment Quality Guidelines for Protection of Aquatic Life (freshwater)	ISQG	35.7	5.9	0.6	n/a	0.17	n/a
	PEL	197	17	3.5	n/a	0.486	n/a
2025 Samples	OL-B	60.5	1.16	0.529	178	n/a	734
	OL-F	6.6	0.72	0.115	50.2	0.021	389
	OL-100	65.9	1.88	0.487	120	0.156	884
	OL-250	38.1	1.33	0.494	142.5	n/a	580.5
	HL-B-IN	49.15	1.085	0.2125	290.5	n/a	351.5
	HL-REF	63.4	12.7	0.949	1240	0.162	680
	HL-100-07	12.5	1.71	0.138	193	n/a	554
	HL-100-07	12.5	1.71	0.138	193	n/a	554
	HL-100-11	8.35	2.11	0.121	318	n/a	784
	HL-250-11	3.25	2.47	0.039	110	n/a	507
	HL-250-09	60.1	1.81	0.619	350	n/a	989
	HL-250-07	32.7	9.73	0.766	491	n/a	808
	HL-500-07	72	3.09	0.978	2070	n/a	1770
	HL-500-11	31.6	3.05	0.418	648	0.085	819
	HL-100-09	51.6	1.27	0.335	185	n/a	605
	Instances above guideline	8 of LEL 8 of ISQG	2 of ISQG	4 of LEL 4 of ISQG	4 of LEL 2 of SEL	None	9 of LEL
2024 Samples - 75 th Percentile (OL and HL samples, 5 in total)		58.8	6.08	0.871	697	0.115	1304
2023 Samples - 75 th Percentile (SL-B samples, 5 in total)		34.0	14.9	0.788	987	0.134	717
2022 Samples - 75 th Percentile (SL-B samples, 5 in total)		11.7	5.57	0.255	462	0.0403	190
2021 Samples - 75 th Percentile (5 OL-B and 5 HL-B samples)		25.6	1.77	0.222	185.5	0.0485	450

CCME: Canadian Council of Ministers of the Environment

LEL: Lowest Effect Level indicating concentration in the sediment that can be tolerated by the majority of benthic organisms

SEL: Severe Effect Level indicating a concentration in the sediment at which pronounced disturbance of the sediment-dwelling community can be expected.

ISQG: Interim Sediment Quality Guidelines

PEL: Probable Effect Level indicating a concentration in the sediment above which adverse effects are expected to occur frequently

In addition to metal analysis, as part of Cycle 2 of the Environmental Effects Monitoring program, the following additional analyses were conducted on the sediment samples:

- Physical sampling and particle size distribution: Results indicated that the sediment at sampling station locations in Otto Lake and Herman Lake are dominated by silt with minor clay content.
- Carbon and nitrogen: Found elevated total carbon and total Kjeldahl nitrogen levels, which are generally associated with eutrophication, human activities and/or land use changes. There were several measurements above the applicable LEL and SEL at multiple sampling station locations in Otto Lake and Herman Lake.
- Acid volatile sulphide and extractable metals: Results suggest that the sulphide binding capacity in the sediments is relatively low across most stations; however, the absence of detectable mercury and relatively modest concentrations of other extractable metals indicate limited evidence of widespread metal bioavailability or toxicity risk to benthic organisms within sampled sediments.

Detailed sampling results and analyses are provided in the 2025 IAAC Biological Report (G3 Consulting, 2026).

3.18.3 Monitor fish health through fish tissue sampling and fish population studies. Monitoring shall include lower trophic level indicator species and shall include monitoring of fish abundance, fish population structure and other fish health metrics that shall be determined in consultation in Indigenous groups and relevant authorities. The Proponent shall conduct monitoring for one year prior to operation and at least twice a year for the first three years of operation and shall:

Response: Alamos conducted fish tissue sampling and fish population studies in Otto Lake and Herman Lake in 2021, then in Spring Lake in 2022 and 2023 (the receiving body for the construction phase). The sampling and studies were not conducted in 2024 with the change in final effluent discharge location to Otto Lake as this necessitated new baseline work including plume dispersion studies, to define how, when and where receiving body monitoring should be conducted. A federal Environmental Effects Monitoring pre-design study was conducted in Otto Lake in October 2024, the results from which directed the Cycle 2 monitoring program in 2025. In 2025, fish tissue and population surveys were conducted at Otto Lake and Herman Lake in the spring and fall (June 17-18 and September 8-11), as well as at Smithy Lake, a reference lake with no influence from the Project, in the fall (October 28-30).

The fish community indicators observed in the 2025 surveys were consistent with expected population structure and evidence of recruitment. A total of 298 fish were captured: 148 in Herman Lake, 122 in Otto Lake, and 28 in Smithy Lake. Catch-per-unit-effort was highest in June, likely reflecting increased spring activity. Length-frequency and age-class distributions for Northern Pike, Walleye, Lake Whitefish, and White Sucker showed broad size ranges and multiple age classes, indicating ongoing recruitment and normal growth patterns. Fish health indicators, including fecundity, gonadosomatic index, hepatosomatic index, and condition factor, were generally within expected ranges. Most Lake Whitefish and White Sucker had condition factors near or above the benchmark of 1.0, while Northern Pike values were consistent with expected species morphology. The results of the metal bioaccumulation measurements in the fish tissue are presented in Section 5.4.4.

Detailed sampling results and analyses are provided in the 2025 IAAC Biological Report (G3 Consulting, 2026).

3.18.3.1 If the results of monitoring during the first three years of operation demonstrate that no adverse environmental effects to fish and fish habitat from Designated Project activities are occurring, continue monitoring every three years after the first three years for a duration that shall be determined in consultation with Indigenous groups and relevant authorities; or

3.18.3.2 If the results of monitoring during the first three years of operation demonstrate that adverse environmental effects to fish and fish habitat from Designated Project activities are occurring, determine, in consultation with Indigenous groups and relevant authorities, with what frequency and for what duration additional monitoring shall occur;

Response: As the Project began the operations phase in late 2023, there were no specific actions for EA condition 3.18.3.1 or 3.18.3.2 in 2025.

3.18.4 Monitor nutrient levels, algae abundance, and dissolved oxygen levels. In doing so the Proponent shall:

3.18.4.1 Conduct monitoring one year prior to operation;

3.18.4.2 Conduct monitoring at least twice a year for the first three years of operation and:

3.18.4.2.1 If the results of the monitoring referred to in condition 3.18.4.2 demonstrate a statistically significant change with the results of monitoring referred to in condition 3.18.4.1, conduct a fish habitat utilization survey to verify that these changes do not cause adverse environmental effects to fish and fish habitat. The Proponent shall determine the methodology, the frequency and the duration of this survey in consultation with Indigenous groups and relevant authorities.

Response: In 2024, it was identified that the monthly surface water sampling conducted in Otto Lake and Herman Lake, which includes analysis of dissolved oxygen and nutrient levels such as phosphorus, nitrate and ammonia, and whose results were reported for this condition in previous years' IAAC Reports, was not appropriate for this condition.

As part of Cycle 2 of the Environmental Effects Monitoring program, the 2025 sampling was conducted at the photic zone, the depth at which light intensity is approximately 1% of surface illumination, and included analysis for nutrient levels of chlorophyll-a, algal abundance, dissolved oxygen, temperature, pH and conductivity. Sampling was conducted at Otto Lake and Herman Lake on June 17 and September 17. The results are presented in the following table.

Season and Sample ID		Chloro-phyll-a	Temper-ature	Dissolved Oxygen	Conduc-tivity	pH	Density	Biovolume
		(µg/L)	(°C)	(mg/L)	(µs/cm)		(#organisms /mL)	(µm³/mL)
June 2025	OL-B	17.7	18.9	9.91	150.2	9.91	29 +/- 59	12,269 +/- 21,942
	OL-F	13.7	20.1	9.65	149.4	9.77	59 +/- 76	12,238 +/- 18,027
	OL-100	18.8	18.6	9.17	155.9	10.08	60 +/- 82	29,122 +/- 48,347
	OL-250	172	19.6	9.16	149.9	9.55	43 +/- 68	11,317 +/- 16,550
	HL-B-IN	14.2	18	10.12	139.5	10.04	29 +/- 36	49,148 +/- 149,749
	HL-B	13.4	17.05	10.32	136.5	10.2	40 +/- 50	41,025 +/- 116,608
	HL-REF	14.2	20.1	9.71	145.1	10.81	36 +/- 55	28,260 +/- 51,020
September 2025	OL-100	1.53	18.63	9.45	414	7.91	12 +/- 24	2,747 +/- 4,305
	OL-250	2.04	18.57	9.39	413	7.93	29 +/- 45	4,247 +/- 7,193
	HL-B	1.13	17.02	9.21	179	8.16	41 +/- 70	12,809 +/- 17,609
	HL-REF	2.46	17.26	9.5	182	8.36	74 +/- 91	38,862 +/- 73,980
	HL-100-09	2.71	15.54	5.3	147	8.27	39 +/- 49	9,551 +/- 16,674

Dissolved oxygen levels were all above the provincial objectives for aquatic life protection (5–6 mg/L) except the deeper Herman Lake station, indicating conditions were suitable for aquatic life during both sampling periods. Chlorophyll-a concentrations were generally moderate in spring, with one elevated observation; and lower in fall.

Algal density and biovolume varied by station and season. Periphyton richness and diversity were generally similar among stations and seasons, although Otto Lake supported higher taxa richness than Herman Lake. Multivariate analysis indicated communities were more similar within lakes than between lakes, with seasonal variation being the primary driver. Diatoms dominated both lakes in June; in September, Otto Lake communities shifted toward chrysophyte dominance, while Herman Lake remained largely diatom-dominated with minor cyanobacteria presence.

Detailed sampling results and analyses are provided in the 2025 IAAC Biological Report (G3 Consulting, 2026).

Alamos will continue monitoring in 2026 and 2027 (the third and fourth years of operation), and will then conduct the statistical analysis required by EA condition 3.18.4.2.1 to determine whether a fish habitat utilization study is required.

3.18.4.3 After the third year of operation, the Proponent shall:

3.18.4.3.1 Continue monitoring of nutrient levels, algae abundance and dissolved oxygen levels every three years for a duration that shall be determined in consultation with Indigenous groups and relevant authorities, if the results of monitoring referred to in condition 3.18.4.2 demonstrate that no adverse environmental effects to fish and fish habitat from Designated Project activities are occurring; or

3.18.4.3.2 Continue monitoring at a frequency and duration that shall be determined in consultation with Indigenous groups and relevant authorities, if the results of monitoring referred to in condition 3.18.4.2 demonstrate that adverse environmental effects to fish and fish habitat from Designated Project activities are occurring.

Response: As the Project began operations phase in late 2023, there was no specific action for EA condition 3.18.4.3 in 2025.

3.18.5 if results of the monitoring referred to in conditions 3.18.1, 3.18.2, 3.18.3 or 3.18.4 or the results of the fish habitat utilization survey referred to in condition 3.18.4.2.1 demonstrate that modified or additional mitigation measures are required to protect fish and fish habitat from changes to water and sediment quality, develop and implement modified or additional mitigation measures pursuant to condition 2.7, which shall include, at a minimum, the installation and use of an effluent treatment facility. The Proponent shall submit these measures to the Agency before implementing them.

Response: As described in the above sections, for the most part, the monitoring referred to in EA conditions 3.18.1, 3.18.2, 3.18.3 and 3.18.4 has thus far not shown adverse environmental effects on fish and fish habitat caused by changes in water and sediment quality due to the Project.

The only exception was the elevated nitrate concentration measurements in the Water Quality Control Pond in 2025, in response to which Alamos trialed a bench scale water treatment system to explore the use of micro-C, a natural compound that uses biological processes to break down nitrates in water. A larger scale, portable treatment system was later installed in the Lovell Lake Treatment Pond where the outflow into the greater water management system can be controlled to provide sufficient residence time for the breakdown of nitrates. Further studies are planned for 2026 to optimize the system with the intention of installing a permanent water treatment plant in the future. Alamos will submit the proposed measures to the Agency before implementing them. During this period, Alamos maintained transparency with its regulators and held back discharging to Otto Lake until nitrate concentrations were acceptable.

3.19 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat in Otto Lake, Herman Lake and Goudreau Lake from changes in groundwater quality caused by the Designated Project.

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Groundwater Monitoring Plan (Appendix 6-F of the Water Management Plan). It was finalized in January 2021 and provided to consulted parties in January and March 2021. It was subsequently updated in December 2022.

3.19 (continued) The Proponent shall implement the follow-up program during all phases of the Designated Project in consultation with Indigenous groups. As part of the implementation of the follow-up program, the Proponent shall...

3.19.1 Monitor groundwater quality using as benchmarks the comparative standards for water quality identified by the Proponent in Table 7-54 of the Environmental Impact Statement; and

Response: The groundwater monitoring plan has been implemented since 2022, with 166 samples being collected in 2025. The following table present a summary of the 2025 sampling results for the parameters specified in Table 7-54 of the Environmental Impact Statement (EIS). Further information, including individual sample results, additional water quality parameters and well water levels, is provided in the annual Groundwater Water Report generated as required for the provincial ECA for Industrial Sewage Works (2066-CQLN6X). As noted in the following table, the 2025 data is generally below the baseline groundwater data. There appear to be some trends developing in the data compared to 2022-2024 data, particularly with the non-metal parameters, however additional monitoring is required to effectively interpret groundwater quality with respect to the impact from the Project.

Parameter (mg/L)	Comparative Standards As presented in Table 7-54 of the EIS			2025 Data			Trending Compared to 2022-2024 Data
	Baseline Groundwater*	ODWS	PWQO	75 th Percentile **	Number of Samples Above (or Below)		
					Baseline GW	ODWS or PWQO	
Alkalinity	319			185	3	n/a	--
Chloride	42			4.88	7	n/a	--
Sulphate	5800	500		39.0	0	0	increase
pH [no units]	6.6 - 10.98	6.5 - 8.5	6.5 - 8.5	7.46	0 above 34 below	0 above 32 below	--
Phosphorus (T)	0.03 - 0.49		0.01 - 0.03	0.094	0 above 4 below	4 above 7 below	decrease
Ammonia N	9.3		0.0156	0.091	0	119	increase
Nitrate - N	13.4	1		0.11	1	18	increase
Organic Carbon (D)	24.5	5		5.0	0	44	decrease
Total Dissolved Solids	630	500		280	4	7	increase
Cyanide (T)	7.28	0.2		0.001	0	0	--
Aluminum	41	0.1	0.08	0.010	0	13	--
Arsenic	0.02	0.025	0.005	0.001	0	5	--
Boron	0.193	5	0.2	0.031	2	1	--
Cadmium	0.00254	0.005	0.0005	0.000005	0	0	--
Calcium	631			76.2	0	n/a	increase
Chromium	0.122	0.05	0.0089	0.00025	0	1	--
Cobalt	0.0713		0.0009	0.00053	3	28	--
Copper	0.49	1	0.005	0.0015	0	8	--
Iron	85	0.3	0.3	0.199	0	33	--
Lead	0.0275	0.01	0.01	0.000025	0	0	--
Manganese	6.4	0.05		0.343	0	93	--
Mercury	0.001	0.001	0.0002	0.0000025	0	0	--
Molybdenum	0.112		0.04	0.0012	0	3	decrease
Nickel	0.136		0.025	0.0009	3	3	--
Selenium	1.5	0.01	0.1	0.00028	0	0	--

Parameter (mg/L)	Comparative Standards As presented in Table 7-54 of the EIS			2025 Data		Trending Compared to 2022-2024 Data	
				75 th Percentile **	Number of Samples Above (or Below)		
	Baseline Groundwater*	ODWS	PWQO		Baseline GW		ODWS or PWQO
Silver	0.008		0.0001	0.000005	0	1	--
Thallium	0.00093		0.0003	0.000005	0	0	--
Vanadium	0.217		0.006	0.0009	0	1	--
Zinc	0.262	5	0.02	0.0054	5	18	--

* Baseline Groundwater numbers include full range across Baseline Groundwater, TMF Water, MRMF Leachate and Pit Water as presented in Table 7-54 of the EIS

** The average is presented instead of the 75th percentile for pH and phosphorus

ODWS: Ontario Drinking Water Standards

PWQO: Provincial Water Quality Objectives

3.19.2 If the results of the monitoring referred to in condition 3.19.1 demonstrate that modified or additional mitigation measures are required to mitigate adverse environmental effects on fish and fish habitat of changes in groundwater quality caused by the Designated Project, develop and implement modified or additional mitigation measures pursuant to condition 2.7. The Proponent shall submit these measures to the Agency before implementing them.

Response: As described in the section above, the monitoring referred to in EA conditions 3.19.1 thus far has not varied significantly beyond the baseline groundwater quality and does not indicate that mitigations are required to mitigate adverse environmental effects on fish and fish habitat caused by changes in groundwater quality.

C. Migratory Birds

4.1 The Proponent shall carry out the Designated Project in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's Avoidance Guidelines and the risk of incidental take. The Proponent's actions when carrying out the Designated Project shall be in compliance with the Migratory Birds Convention Act, 1994, the Migratory Birds Regulations and with the Species at Risk Act.

Response: In 2025, no land was cleared at the Project. When required, Alamos is committed to conducting tree clearing outside the migratory bird season of April 20 to August 29.

4.2 The Proponent shall control lighting required during all phases of the Designated Project, including direction, timing and intensity, to avoid adverse environmental effects on migratory birds, while meeting health and safety requirements.

Response: In 2025, Alamos continued to implement the procedures related to controlling light as provided in the Air/Atmospheric Environment Management Plan and Wildlife and Vegetation Management Plan. Halogen light stands are equipped with hoods, and LTE lights are directed downwards, to direct light away from potential offsite nesting areas.

4.3 The Proponent shall undertake, in consultation with Indigenous groups and relevant authorities, progressive reclamation of the project study area. The Proponent shall identify, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, plant species native to the area of the Designated Project to use for revegetation as part of the progressive reclamation, including species suitable to create habitat for migratory birds.

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups and relevant authorities, a draft Closure Plan and a draft Wildlife and Vegetation Management Plan. They were finalized in January 2021 and provided to consulted parties in January and March 2021. They included the identification of

possible native species for revegetation. As there are limited disturbed areas that are not part of active operations, there has been limited progressive reclamation.

4.4 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the use by migratory birds of surface water facilities in the project study area.

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Wildlife and Vegetation Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021.

4.4 (continued) As part of the implementation of the follow-up program, the Proponent shall:

4.4.1 Monitor, at times migratory birds may be present in the project study area, the use by migratory birds of the tailings management facility and the Water Quality Control Pond during all phases of the Designated Project until such time that water quality in the tailings management facility and the Water Quality Control Pond meet legislative requirements and water quality objectives. The water quality objectives are to be established using an ecological risk based approach, developed in consultation with Indigenous groups and relevant authorities;

Response: Alamos monitors the use of the tailings management facility and the Water Quality Control Pond by migratory birds through daily inspections. Migratory bird use of the tailings management facility and Water Quality Control Pond in 2025 was observed to be limited (3 sightings of geese in the Dyke 5 area), likely due to industrial activity in the area, and the abundant availability of surrounding natural areas.

4.4.2 Monitor, at times migratory birds may be present in the project study area, the use by migratory birds of the open-pit lake during decommissioning. The Proponent shall determine, in consultation with indigenous groups and relevant authorities, the frequency and duration of the monitoring during decommissioning; and

Response: As the Project was in operations phase in 2025, there was no specific action for EA condition 4.4.2 in 2025.

4.4.3 If results of the monitoring referred to in conditions 4.4.1 or 4.4.2 indicate that migratory birds use the tailings management facility, the Water Quality Control Pond or the open-pit lake, develop, in consultation with Indigenous groups, and implement deterrence measures pursuant to condition 2.7. The Proponent shall submit these measures to the Agency before implementing them.

Response: In 2025, migratory bird use of the tailings management facility and Water Quality Control Pond was observed to be limited, likely due to industrial activity in the area, and the abundant availability of surrounding natural areas. As a result, no deterrence measures were required to be implemented near water in 2025. Alamos may consider the use of bird cannons if increased sightings occur. Meanwhile, falcon kites and predator effigies are used on land to deter nesting in equipment or in areas that would be disturbed as a course of production.

4.5 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures to avoid harm to migratory birds, their eggs, and nests, including the mitigation measures used to comply with conditions 4.1 to 4.3. As part of the development of the follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of the progressive reclamation referred to in condition 4.3.

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Wildlife and Vegetation Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021.

4.5 (continued) The Proponent shall implement the follow-up program during all phases of the Designated Project. As part of the implementation of the follow-up program, the Proponent shall:

4.5.1 Conduct migratory bird surveys annually for the first three years following completion of construction to assess changes in migratory bird populations caused by the Designated Project. The Proponent shall determine the methodology for the migratory bird surveys in consultation with Indigenous groups and relevant authorities. The Proponent shall determine, in consultation with Indigenous groups and relevant authorities and based on the results of the initial surveys, if additional surveys are required after the first three years following completion of construction and at what frequency and in which locations these additional surveys shall occur; and

Response: In 2024, Alamos conducted the first post-construction migratory bird survey of the Magino Mine property boundary. Two dawn-breeding bird surveys were conducted from July 31 to August 15. 57 species were identified within the study area, of which 4 are of special concern: Canada Warbler, Barn Swallow, Evening Grosbeak and Olive-sided Flycatcher. Due to the late implementation of the field work, Indigenous groups were only notified after the study was completed.

In 2025, migratory bird surveys at the Magino Mine property boundary included two rounds of dawn breeding bird surveys conducted from June 6 to 8 and July 6 to 9; two rounds of Call Playback Surveys for marsh birds conducted from June 8 to 9 and July 8; and three rounds of nocturnal bird surveys conducted the 7 days of the full moons on July 11 and July 10. Indigenous groups were notified of the proposed field work during the preceding monthly and quarterly meetings. 91 bird species were identified within the study area, of which 5 are of special concern: Barn Swallow, Canada Warbler, Common Nighthawk, Eastern Whip-poor-will, and Eastern Wood-pewee. The increase in observations relative to 2024 is partially attributed to the 2024 monitoring program occurring outside the breeding season. There were 42 unique species observations in 2025 compared to 2024, bringing the total species observations for both years to 99.

Of the 99 species identified during the 2024-2025 migratory bird surveys, 85 species had been observed in the 2012-2016 Terrestrial Ecology Baseline Study, and 14 new species were observed. The 2026 survey program is anticipated to provide additional opportunities to observe uncommon species and is being designed to include previously inaccessible observation stations (due to construction) closer to operations to understand breeding birds' utilization of the area while active mine practices are occurring.

4.5.2 Monitor the effectiveness of the progressive reclamation referred to in condition 4.3, including the establishment of native plant species to create habitat for migratory birds, annually during operation and during the first three years of decommissioning and every five years thereafter. The Proponent shall monitor the effectiveness of the progressive reclamation referred to in condition 4.3 until the Proponent has determined, in consultation with Indigenous groups and relevant authorities, that the performance indicators have been met."

Response: As operations began in late 2023, there has been limited opportunity for progressive rehabilitation at the Project and there were no significant observations in 2025 related to migratory bird habitat due to the resulting establishment of native plant species. Alamos nonetheless implemented other portions of the follow-up program in 2025, for example:

- In response to the discovery of bank swallows nesting in the upper overburden banks of the open pit in 2023, the bank swallow nest was removed from the open pit once the birds left for the season and in 2024 the exposed banks were sloped to discourage future nesting in the open pit. In summer 2025, a new bank swallow nest was established in a sandpile adjacent to the open pit, which is used for winter road traction such that the area was left undisturbed until after the birds left for the season. The nest was removed in the fall and the sand pile depleted over the course of the winter.
- Employees were encouraged to report observations of birds and/or nests in active areas. In 2025, there were limited reported bird sitings, specifically 3 sightings of geese near Dyke 5.

There were no fatalities of migratory birds nor damage to migratory bird nests or eggs observed in 2025.

D. Health of Indigenous Peoples

5.1 The Proponent shall develop, prior to construction, measures to mitigate emissions of dust and fugitive particulate generated by the Designated Project, including dust associated with mine vehicles

on roads located within the property boundary, that take into account the standards and criteria set out in the Canadian Council of Ministers of the Environment's Canadian Ambient Air Quality Standards and Ontario's Ambient Air Quality Criteria. The Proponent shall submit these measures to the Agency before implementing them. The Proponent shall implement these measures during construction, operation and the first three years of decommissioning.

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups and relevant authorities, measures consistent with the previously developed Fugitive Dust Best Management Practices Plan as part of the draft Air / Atmospheric Environment Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021. Alamos continued to implement the dust control measures in the Air / Atmospheric Environment Management Plan, such as road watering, throughout 2025 as required based on observations from daily inspections.

5.2 The Proponent shall undertake reagent handling and ore processing activities in an enclosed space equipped with a dust collection system.

Response: The crushers and the reagent areas are enclosed with dust collection systems, and Alamos continued to operate them as such in 2025.

5.3 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on the health of Indigenous Peoples caused by increased concentration of air contaminants, including total suspended particulates, particulate matter (PM10), fine particulate matter (PM2.5), sulphur dioxide, nitrogen dioxide and cadmium. As part of the follow-up program, the Proponent shall:

5.3.1 Identify, prior to construction, monitoring locations for air contaminants within areas used by Indigenous groups for traditional purposes for which maximum concentrations of air contaminants were predicted by the Proponent during the environmental assessment, as identified in Appendix N of the final response to Information Request 01 (Canadian Environmental Assessment Registry Reference Number 80044, Document Number 26);

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Air/Atmospheric Environment Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021. The follow-up program identifies the locations of three air quality monitors:

- AM1 located on the Magino Mine property near its southern boundary;
- AM2 located on the boundary between the Magino Mine and Island Gold Mine, both operated by Alamos as part of the Island Gold District; and
- AM3 located on the Magino Mine property near its northern boundary.

Prodigy began monitoring at AM2 station beginning August 2021, at AM3 station beginning September 2022 and at AM1 station beginning January 2023.

5.3.2 Monitor, during construction, operation and the first three years of decommissioning, air contaminants at the monitoring locations identified pursuant to condition 5.3.1, using as benchmarks the standards and criteria set out in the Canadian Council of Ministers of the Environment's Canadian Ambient Air Quality Standards and Ontario's Ambient Air Quality Criteria. The Proponent shall monitor fine particulate matter (PM2.5) in real-time, particulate matter (PM10) and cadmium at a minimum every 6 days and total suspended particulates, sulphur dioxide and nitrogen dioxide at a frequency that shall allow the Proponent to monitor adverse environmental effects on human health. The Proponent shall determine the frequency of monitoring for total suspended particulates, Sulphur dioxide and nitrogen dioxide in consultation with Indigenous groups and relevant authorities during the development of the follow-up program;

Response: The follow-up program describes the monitoring parameters and frequency for the air monitoring program at the Project. Ongoing challenges with operating the monitors and data collection have resulted in multiple gaps in the air monitoring data since the stations were commissioned in 2021. These challenges include

access, power and equipment reliability in remote areas and extreme winter climate. These challenges are consistent with challenges facing other gold mining operations in the north. Alamos recognizes these findings as non-compliances and is continuously working to identify opportunities to address the significant challenges to maintain the air monitoring program and maintain compliance with the conditions that relate to it.

The following table presents a summary of the available monitoring data for 2025. Similar to the 2023 and 2024 data, the 2025 data indicates higher concentrations of NO₂ and particulate matter than the 2021 and 2022 data which was collected prior to operations. The 2025 data is consistent with 2023 and 2024 data. There were a number of measurements that were greater than trigger levels, as outlined in the following summary table.

Air Quality		Passive Monitoring		Continuous Monitoring			Discrete Sampling Every 6 days	
		SO ₂	NO ₂	NO ₂	PM _{2.5}	PM ₁₀	TSP	Cadmium
		30 day	30 day	1-hr	24-hr RA	24-hr RA	24-hr	24-hr
		ppb	ppb	ppb	µg/m ³	µg/m ³	µg/m ³	µg/m ³
Follow-up Program Trigger		6	14	31	19	35	84	0.0175
OAAQC		-	-	200	30	50	120	0.025
CAAQC		-	-	42	27	-	-	-
2025 Samples - Maximum	AM1	0.3	1.5	145	96	99	71	0.00018
	AM2	0.3	3.4	38	18	18	117	<0.00042
	AM3	0.2	3.1	32	20	21	67	<0.00042
Exceedances of AAQCs		None	None	160 of CAAQC	12 of CAAQC 11 of OAAQC	6 of OAAQC	None	None
2024 Samples - Maximum (All AM1, AM2 and AM3 data)		0.6	3.3	118	36	106	216	0.00008
2023 Samples - Maximum (All AM1, AM2 and AM3 data)		0.2	4.7	33	45	65	198	0.00050
2022 Samples - Maximum (All AM1, AM2 and AM3 data)		<0.1	2.7	n/a	20	32	87	<0.00042
2021 Samples - Maximum (All AM1, AM2 and AM3 data)		0.2	2.7	n/a	7	9	32	<0.00042

OAAQC: Ontario Ambient Air Quality Criteria

CAAQC: Canadian Ambient Air Quality Criteria

RA: Rolling Average

n/a: not available

5.3.3 Notify the Agency and Indigenous groups in writing within 24 hours of any exceedance(s) observed by the Proponent during monitoring referred to in condition 5.3.2 of 1-hour limits or 24-hour limits of the standards and criteria set out in the Canadian Council of Ministers of the Environment's Canadian Ambient Air Quality Standards and Ontario's Ambient Air Quality Criteria, except for fine particulate matter (PM_{2.5}); and

Response: In 2025, Alamos continued to experience challenges operating the air quality monitors, as well as with data collection. These challenges include access, power and equipment reliability in remote areas and are not dissimilar to those challenges facing other gold mining operations in the north. Due to these challenges, data indicating a potential exceedance is not always available within the 24-hour timeframe required to make notifications. Alamos communicates these challenges, as well as any exceedances related to Project activity, at

monthly and quarterly meeting with Indigenous Groups, and in the annual reporting to the Agency. As indicated above, Alamos is continuously working to identify opportunities to address the significant challenges to maintain the air monitoring program and maintain compliance with the conditions that relate to it.

5.3.4 Determine, in consultation with Indigenous groups and relevant authorities, the thresholds for concentration of fine particulate matter (PM2.5) above which the Proponent shall notify Indigenous groups.

Response: The follow-up program specifies the PM2.5 notification threshold as the CAAQC.

5.4 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures as it pertains to the adverse environmental effects on health of Indigenous Peoples caused by contamination of water and fish. As part of the follow-up program, the Proponent shall:

5.4.1 Identify, prior to construction, fish species that shall be monitored, waterbodies where Indigenous use is expected and where contaminants shall be monitored;

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Surface Water Monitoring Plan (Appendix 6-D of the Water Management Plan). The draft Surface Water Monitoring Plan identified fish species to be monitored, waterbodies where Indigenous use is expected and where contaminants will be monitored. It was finalized January 2021 and provided consulted parties in January and March 2021. It was subsequently updated in March 2023. The monitoring program was updated for 2025 following a federal Environmental Effects Monitoring pre-design study conducted in Otto Lake in 2024, the results from which informed Cycle 2 of the monitoring program which uses a new weight-of-evidence approach (holistic, ecosystem-based assessment) to determine effluent effects and potential influence on the receiving environment.

5.4.2 Monitor mercury, methylmercury, cobalt, lead and arsenic in surface water in Otto Lake and other downstream waterbodies identified pursuant to condition 5.4.1 during all phases of the Designated Project;

Response: Unless prevented by unsafe conditions, Alamos conducts monthly surface water sampling in Otto Lake (the immediate receiving waterbody for Magino Mine’s effluent) and Herman Lake (the next downstream waterbody) according to the Surface Water Monitoring Plan (Appendix 6-D of the Water Management Plan) and as required by the provincial ECA for Industrial Sewage Works (2066-CQLN6X). The following table presents the 2025 sampling results for the parameters specified in EA condition 5.4.2. Further information, including individual sample results, additional water quality parameters, and sampling for additional water bodies, is provided in the annual Surface Water Report generated as required for the provincial ECA for Industrial Sewage Works (2066-CQLN6X).

There were no parameter concentrations above provincial or federal water quality guidelines in 2025.

Water Quality		Number of Monthly Samples	Mercury	Methyl Mercury	Cobalt	Lead	Arsenic
			ng/L	ng/L	mg/L	mg/L	mg/L
Provincial Water Quality Objectives			200	n/a	0.0009(i)	0.005 0.001(i)	0.1 0.005(i)
CCME Water Quality Guidelines for Protection of Aquatic Life (Long term)			26	4	n/a	0.001	0.005
2025 Samples - 75 th Percentile	OL-B	9	0.713	0.132	0.00041	0.000186	0.00066
	OL-F	6 + 1 Dup	1.49	0.102	0.00047	<0.00005	0.00068
	OL-DB-SUR	2	1.37	0.166	0.00037	<0.00005	0.00075
	OL-DB-BOT	2	1.21	0.148	0.00041	<0.00005	0.00072
	HL-B	10+ 2 Dup	1.025	0.103	0.00016	0.00005	0.00068
	HL-B-In	10	0.84	0.093	0.00018	0.00011	0.00066
	HL-REF	10 + 6 Dup	1.43	0.115	0.00017	0.00018	0.00062
	HL-DB-SUR	3	1.13	0.163	0.00026	0.00013	0.00072
	HL-DB-BOT	3	0.73	0.245	0.00016	<0.00005	0.00069
	Instances above guideline		None	None	None	None	None
2024 Samples - 75 th Percentile (All OL and HL samples)		65	0.86	0.102	0.00047	0.000057	0.00071
2023 Samples - 75 th Percentile (All OL and HL samples)		76 53 for MeHg	1.185	0.064	0.00005	0.000025	0.00060
2022 Samples - 75 th Percentile (All OL and HL samples)		90	0.930	0.049	<0.00005	0.000025	0.00065
2021 Samples - 75 th Percentile (All OL and HL samples)		87	0.660	0.044	0.00005	0.000025	0.00063

CCME: Canadian Council of Ministers of the Environment
(i): interim objective

5.4.3 Monitor mercury, methylmercury, cobalt, lead and arsenic in surface water in Goudreau Lake and other downstream waterbodies identified pursuant to condition 5.4.1 during decommissioning;

Response: As the Project was in operations phase in 2025, there was no specific action for EA condition 5.4.3 in 2025.

5.4.4 Monitor mercury, methylmercury, lead, arsenic and cobalt in fish tissue in Otto Lake and other downstream waterbodies identified pursuant to condition 5.4.1 every three years during all phases of the Designated Project, starting the first year of construction, and every five years after the end of decommissioning. The Proponent shall determine, in consultation with Indigenous groups and relevant authorities, if additional monitoring must be implemented after the end of decommissioning; and

Response: Alamos conducted fish tissue sampling and fish population studies in Otto Lake and Herman Lake in 2021, then in Spring Lake in 2022 and 2023 (the receiving body for the construction phase). The sampling and studies were not conducted in 2024 with the change in final effluent discharge location to Otto Lake as this necessitated new baseline work including plume dispersion studies, to define how, when and where receiving body monitoring should be conducted. A federal Environmental Effects Monitoring pre-design study was conducted in Otto Lake in October 2024, the results from which directed the Cycle 2 monitoring program in 2025.

In 2025, fish tissue and population surveys were conducted at Otto Lake and Herman Lake in the spring and fall (June 17-18 and September 8-11), as well as at Smithy Lake, a reference lake with no influence from the Project, in the fall (October 28-30).

In 2025, metal bioaccumulation in fish tissue was assessed in Lake Whitefish, Northern Pike, White Sucker, and Walleye. Muscle samples were analyzed for arsenic, cobalt, lead, mercury, and methylmercury, and compared with applicable consumption and wildlife protection guidelines from the Ontario Ministry of the Environment, Conservation and Parks, Health Canada, the Canadian Food Inspection Agency, and CCME. June sampling used non-lethal biopsy techniques; September sampling involved lethal dorsal muscle. Total mercury concentrations were generally below the 0.5 mg/kg consumption guideline for most species; however, several predatory fish (particularly Northern Pike and Walleye) exceeded this sensitive population threshold, though all remained below the 1.8 mg/kg guideline for the general population consumption. Methylmercury concentrations exceeded the CCME wildlife dietary guideline (0.033 mg/kg), a conservative screening benchmark intended to evaluate potential trophic transfer. Arsenic, lead, and cobalt were generally low and near detection limits, with only isolated exceedances. Historical comparisons indicate these 2025 results align with previous monitoring programs and regional Canadian Shield Lake studies.

Detailed sampling results and analyses are provided in the 2025 IAAC Biological Report (G3 Consulting, 2026).

5.4.5 monitor mercury, methylmercury, lead, arsenic and cobalt in fish tissue in Goudreau Lake and other downstream waterbodies identified pursuant to condition 5.4.1 every three years starting at the beginning of decommissioning and for a duration that shall be determined in consultation with Indigenous groups and relevant authorities.

Response: As the Project was in operations phase in 2025, there was no specific action for EA condition 5.4.5 in 2025.

E. Current Use of Lands and Resources for Traditional Purposes

6.1 The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a communication plan to share information related to the Designated Project and the adverse environmental effects of the Designated Project with Indigenous groups. The Proponent shall implement and maintain the communication plan up-to-date during all phases of the Designated Project. The communication plan shall include procedures, including timing and methods, for sharing information on the following:

6.1.1 the location and timing of Designated Project activities that may affect quality of experience to Indigenous uses of lands for traditional purposes caused by changes in dust, noise or light within the property boundary and that may permanently or temporarily affect navigation within the project study area;

6.1.2 the results of the follow-up program referred to in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2, and 7.3, including any potential health risks, in plain language, and the modified or additional mitigation measures developed and implemented by the Proponent pursuant to condition 2.7 for each follow-up program.

6.2 The Proponent shall develop, as part of the communication plan referred to in condition in 6.1, procedures for Indigenous groups to provide feedback to the Proponent about adverse environmental effects caused by the Designated Project related to access to and use of lands for traditional purposes, and procedures for the Proponent to document and respond in a timely manner to the feedback received and demonstrate how issues have been addressed, including through the implementation of additional or modified mitigation measures. The Proponent shall implement these procedures during all phases of the Designated Project.

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups, a draft communication plan as required in EA conditions 6.1 and 6.2 as part of the Indigenous Engagement Plan. Prodigy

finalized the Plan in January 2021 and provided it to the parties consulted in January 2021. No changes were made to the communication plan since then.

Alamos continued to implement the communication plan throughout 2025 including quarterly to monthly meetings with the Indigenous groups where information regarding the follow-up programs, and environmental performance in general, is shared and documented in meeting minutes. A SharePoint site is used by all parties to provide and update related documentation.

6.3 The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a Historic Resources Management Plan for structures, sites, or things of historical, archaeological, paleontological, or architectural significance. The Proponent shall implement the plan during all phases of the Designated Project. As part of the plan, for any previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance discovered within the property boundary by the Proponent or brought to the attention of the Proponent by an Indigenous group or another party during any phase of the Designated project, the Proponent shall:

6.3.1 immediately halt work at the location of the discovery, except for actions required to be undertaken to protect the integrity of the discovery;

6.3.2 delineate an area with a radius of at least 30 metres around the discovery as a no-work zone and monitor any work conducted within 50 metres around the discovery;

6.3.3 conduct an assessment at the location of the discovery;

6.3.4 inform the Agency and Indigenous groups within 24 hours of the discovery, and allow Indigenous groups to monitor and participate in the archaeological work; and

6.3.5 consult Indigenous groups and relevant authorities on the manner by which to comply with all applicable legislative or legal requirements and associated regulations and protocols respecting the discovery, recording, transferring and safekeeping of previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance.

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups, a draft Historic Resources Management Plan. Prodigy finalized the Plan in January 2021 and provided it to consulted parties in January and March 2021. Alamos continued to implement the Historic Resources Management Plan throughout 2025.

In 2025, archaeological studies for the haul road and historic Goudreau pits were conducted. Through these studies, and the course of 2025 as a whole, no previously unidentified structures, sites, or things of historical, archaeological, paleontological or architectural significance were identified within the property boundary.

Additionally, in August 2025, the Missanabie Cree First Nation (MCFN) community held a walking tour of Manitou Mountain, a historically significant spiritual location, which Alamos has agreed to protect from exploration.

6.4 As part of the progressive reclamation referred to in condition 4.3, the Proponent shall:

6.4.1 identify, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, species of interest to Indigenous peoples to use for revegetation as part of the progressive reclamation; and

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups and relevant authorities, a draft Closure Plan and a draft Wildlife and Vegetation Management Plan. They were finalized in January 2021 and provided to consulted parties in January and March 2021. They included the identification of possible native species for revegetation.

6.4.2 develop, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, measures to manage the spread of invasive species. The Proponent shall submit these measures to the Agency before implementing them.

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups and relevant authorities, a draft Invasive Species Management Plan and protection measures to mitigate environmental harms associated with terrestrial vegetation (e.g., for revegetation/rehabilitation activities) as part of the draft Wildlife and Vegetation Management Plan. Prodigy finalized the Plans in January 2021 and provided them to consulted parties in January and March 2021.

Alamos continued to implement the measures in the Invasive Species Management Plan throughout 2025, including equipment inspections for foreign material, to manage the spread of invasive species.

*6.5 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes caused by changes in the use of the project study area by mammals, including black bear (*Ursus americanus*) and moose (*Alces alces*). As part of the development of the follow-up program, the Proponent shall identify, in consultation with Indigenous groups and relevant authorities, species of mammals, in addition to black bear (*Ursus americanus*) and moose (*Alces alces*), that shall be monitored. If the results of the monitoring indicate that these mammal species use the property, the Proponent shall implement modified or additional mitigation measures pursuant to condition 2.7 to prevent the identified species of mammals from accessing Designated Project components.*

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Wildlife and Vegetation Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021.

Alamos continued to implement the program throughout 2025 and personnel are encouraged to report wildlife sightings through multiple channels (e.g., drop box, radio, forms).

Bear, wolf, coyote and fox sightings in 2024 and 2025 were notably higher than in previous years. This is believed to be the result of a combination of population growth, the population becoming more accustomed to human/ industrial activity, and employees becoming more diligent in reporting. Moose sightings were lower in 2025 than in previous years and is believed to be the result of inherent variation of animal populations and employee engagement in reporting such sightings.

In response to the elevated bear sightings in 2025, Alamos increased the frequency and magnitude of its measures to prevent wildlife from accessing the Project component. These measures included the use of bear-proof food waste bins to avoid attracting wildlife, using lights to deter, increased training for all employees on working around wildlife, developing and implementing a Wildlife Interaction Standard Operating Procedure, and trapping to prevent re-occurrence of coyotes and wolves.

6.6 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of mitigation measures, including the mitigation measures referred to in conditions 6.1 to 6.4, as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes. The Proponent shall implement the follow-up program during all phases of the Designated Project.

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Traditional Use of Lands and Resources Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021.

Alamos continued to implement the follow-up program throughout 2025, engaging with Indigenous groups through quarterly to monthly meetings where information regarding the follow-up program, and environmental performance in general, is shared and documented in meeting minutes. A SharePoint site is used by all parties to provide and update related documentation.

There were no activities at the Project with the potential to affect the quality of experience of Indigenous uses of lands for traditional purposes were identified in 2025.

F. Wetlands

7.1 The Proponent shall restore a minimum of 40 hectares of wetland within the property boundary. The Proponent shall determine, in consultation with Environment and Climate Change Canada, methods for restoration that are technically and economically feasible and that are appropriate for the project study area.

Response: Restoration of the wetland area will be done as part of the Project closure phase, such that specific planning or action related to this EA condition will be initiated toward the end of the operations phase.

7.2 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of restoration referred to in condition 7.1. As part of the development of the follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of the restoration. The Proponent shall monitor the effectiveness of the restoration from the start of the restoration until performance indicators are met.

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Wildlife and Vegetation Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021.

As restoration of the wetland area will be carried out during the closure phase, specific planning or action related to this EA condition will be initiated toward the end of the operations phase.

*7.3 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the presence of snapping turtle (*Chelydra serpentina*) or snapping turtle eggs within the project study area. The Proponent shall implement the follow-up program during construction and operation. If the Proponent observes snapping turtle or snapping turtle eggs, the Proponent shall develop, in consultation with Indigenous groups and relevant authorities, modified or additional mitigation measures pursuant to condition 2.7, which shall include, at a minimum, the installation of exclusion fences around snapping turtle habitat, if technically feasible, or the relocation of snapping turtles outside of the project study area. The Proponent shall submit these measures to the Agency before implementing them.*

Response: In 2020, Alamos (previously Prodigy) developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Wildlife and Vegetation Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021.

Alamos continued to implement the follow-up program in 2025. No snapping turtles or snapping turtle eggs were observed in 2025.

G. Accidents and Malfunctions

8.1 The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects.

8.2 The Proponent shall, prior to construction, consult with Indigenous groups and relevant authorities on the measures to be implemented to prevent accidents and malfunctions.

8.3 The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, develop an accident and malfunction response plan in relation to the Designated Project. The accident and malfunction plan shall include:

8.3.1 the types of accidents and malfunctions that may cause adverse environmental effects;

8.3.2 the measures to be implemented in response to each type of accident and malfunction referred to in condition 8.3.1 to mitigate any adverse environmental effect(s) caused by the accident or malfunction; and

8.3.3 the role of Indigenous groups in the implementation of the accident and malfunction plan.

Response: In 2020, Alamos (previously Prodigy) developed a draft Accident and Malfunction Response Plan in consultation with Indigenous groups and relevant authorities, which includes measures to prevent accidents and malfunctions as well as measures to respond to them. Prodigy finalized the Plan in January 2021 and provided the final program to consulted parties in January and March 2021.

8.4 In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall immediately implement the measures appropriate to the accident or malfunction as described in the accident and malfunction response plan referred to in condition 8.3.2 and shall:

8.4.1 Notify, as soon as possible, Indigenous groups and relevant authorities of the accident or malfunction, and notify the Agency in writing no later than 24 hours following the accident or malfunction. For the notification to Indigenous groups and the Agency, the Proponent shall specify:

8.4.1.1 the date the accident or malfunction occurred;

8.4.1.2 a description of the accident or malfunction;

8.4.1.3 a list of any substances potentially released in the environment as a result of the accident or malfunction.

8.4.2 Submit a written report to the Agency no later than 30 days after the day on which the accident or malfunction occurred. The written report shall include:

8.4.2.1 a detailed description of the accident or malfunction and of its adverse environmental effects and any associated potential health risks;

8.4.2.2 a description of the measures that were taken by the Proponent to mitigate the adverse environmental effects caused by the accident or malfunction;

8.4.2.3 any view(s) from Indigenous groups and advice from relevant authorities received with respect to the accident or malfunction, its adverse environmental effects, the associated potential health risks and the measures taken by the Proponent to mitigate these adverse environmental effects;

8.4.2.4 a description of any residual adverse environmental effects and any modified or additional measures required by the Proponent to mitigate residual adverse environmental effects; and

8.4.2.5 details concerning the implementation of the accident or malfunction response plan referred to in condition 8.3.

8.4.3 Submit a written report to the Agency no later than 90 days after the day on which the accident or malfunction occurred that includes a description of changes made to avoid a subsequent occurrence of the accident or malfunction and of the modified or additional measure(s) implemented by the Proponent to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation, taking into account the information submitted in the written report pursuant to condition 8.4.2. The report shall include all additional views from Indigenous groups and advice from relevant authorities received by the Proponent since the views and advice referred to in condition 9.4.2.3 were received by the Proponent.”

Response: In 2025, there were five incidents that were externally reportable by the criteria specified in the Accident and Malfunction Response Plan. The following provides the dates on which relevant authorities and Indigenous groups were first notified, and when the 30-day and 90-day reports were submitted to the Agency.

- May 14, 2025 process water spill (Event Reference No. 1-O929KD)
 - Notification to relevant authorities: May 14, 2025
 - Submission of 30-day report: July 26, 2025
 - Submission of 90-day report: July 26, 2025
- June 30, 2025 process water spill (Event Reference No. 1-ONW6Z9)
 - Notification to relevant authorities: June 30, 2025

- Submission of 30-day report: July 26, 2025
- Submission of 90-day report: July 26, 2025
- July 11, 2025 process water spill (Event Reference No. 1-OWYFFQ/1-OWYSSQ)
 - Notification to relevant authorities: July 12, 2025
 - Submission of 30-day report: July 26, 2025
 - Submission of 90-day report: July 26, 2025
- August 19, 2025 diesel spill (Event Reference No. 1-PDUQD4)
 - Notification to relevant authorities: August 19, 2025
 - Submission of 30-day report: n/a – weekly reporting was provided to indigenous partners
 - Submission of 90-day report: October 30, 2025
- October 13, 2025 tailings spill (Event Reference No. 1-PMIHUJ)
 - Notification to relevant authorities: October 13, 2025
 - Submission of 30-day report: October 23, 2025
 - Submission of 90-day report: November 11, 2025

This reporting contained the details described in EA condition 8.4.1, 8.4.2 and 8.4.3, and met or exceeded the requirements / intent of the requirements. Indigenous partners were notified and were subsequently engaged throughout the resolution of the event(s) at their request. As described in the respective reporting, all spills were cleaned up and Alamos is implementing administrative and physical controls to prevent and/or mitigate future occurrences.

8.5 The Proponent shall develop a communication plan in consultation with Indigenous groups. The Proponent shall develop the communication plan prior to construction and shall implement and keep it up to date during all phases of the Designated Project. The plan shall include:

8.5.1 the types of accident and malfunction requiring the Proponent to notify the respective Indigenous groups;

8.5.2 the manner by which Indigenous groups shall be notified by the Proponent of an accident or malfunction and of any opportunities for the Indigenous groups to assist in the response to the accident or malfunction; and

8.5.3 the contact information of the representatives of the Proponent that the Indigenous groups may contact and of the representatives of the respective Indigenous groups to which the Proponent provides notification.

Response: In 2020, Alamos (previously Prodigy) developed a draft Accident and Malfunction Response Plan which included a communication plan in consultation with Indigenous groups and relevant authorities. Prodigy finalized the Plan in January 2021 and provided the final Plan to consulted parties in January and March 2021. There were no revisions or updates to the plan in 2025.

H. Schedules

9.1 The Proponent shall submit to the Agency a schedule for all conditions set out in this Decision Statement no later than 60 days prior to the start of construction. This schedule shall detail all activities planned to fulfill each condition set out in this Decision Statement and the commencement and estimated completion month(s) and year(s) for each of these activities.

9.2 The Proponent shall submit to the Agency a schedule outlining all activities required to carry out all phases of the Designated Project no later than 60 days prior to the start of construction. The schedule shall indicate the commencement and estimated completion month(s) and year(s) and duration of each of these activities.

Response: In 2020, prior to construction, Alamos (previously Prodigy) submitted the initial versions of the Schedule of EA Decision Statement Conditions per EA condition 9.1 and the Schedule of All Activities per EA condition 9.2 to the Agency.

9.3 The Proponent shall submit to the Agency in writing an update to schedules referred to in conditions 9.1 and 9.2 every year no later than March 31, until completion of all activities referred to in each schedule.

9.4 The Proponent shall provide to the Agency revised schedules if any change is made to the initial schedules referred to in conditions 9.1 and 9.2 or to any subsequent update(s) referred to in condition 9.3, upon revision of the schedules.

9.5 The Proponent shall provide Indigenous groups with the schedules referred to in conditions 9.1 and 9.2 and the updates or revisions to the initial schedules pursuant to condition 9.3 and 9.4 at the same time the Proponent provides these documents to the Agency.

Response: Updates to the two schedules referenced in EA conditions 9.1 and 9.2 are provided to the Agency and Indigenous groups with the Annual Report submissions as required. Alamos is submitting updated schedules as part of this 2025 Annual Report in Appendices B and C.

I. Record Keeping

10.1 The Proponent shall maintain all records relevant to the implementation of the conditions set out in this Decision Statement. The Proponent shall retain the records and make them available to the Agency throughout construction and operation and for 25 years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall provide the aforementioned records to the Agency upon demand within a timeframe specified by the Agency.

10.2 The Proponent shall retain all records referred to in condition 10.1 at a facility in Canada and shall provide the address of the facility to the Agency. The Proponent shall notify the Agency at least 30 days prior to any change to the physical location of the facility where the records are retained, and shall provide to the Agency the address of the new location.

Response: Alamos maintains all records relevant to the implementation of the conditions set out in the January 24, 2019 EA Decision Statement, last amended July 26, 2024. Most records are digital and can be accessed at the Project site or at Alamos offices in Dubreuilville and Toronto, Ontario:

Magino Mine Office
12 Goudreau Road
Dubreuilville, Ontario
P0S 1B0

Island Gold District Office
21 Rue des Pins
Dubreuilville, Ontario
P0S 1B0

Toronto Office
181 Bay Street, Suite 3910
Toronto, Ontario
M5J 2T3

Other records are paper and are maintained at the Project site until such a time where they can be transferred to the Dubreuilville office and/or stored/ entered digitally.

10.3 The Proponent shall notify the Agency of any change to the contact information of the Proponent included in this Decision Statement.

Response: On July 12, 2024, Alamos Gold Inc. acquired Prodigy Gold, and continued operations at Magino Mine as part of its greater Island Gold District operations. The Agency was notified August 9, 2024, regarding Alamos acquiring Magino Mine, as well as the change in proponent contact information to Colin Webster (as provided in the Introduction). There have been no changes to the proponent contact since.

J. Greenhouse Gas Management Plan

The original EA Decision Statement issued January 24, 2019, was amended August 23, 2023, and included a new condition, EA condition 11, related to the creation and implementation of a Greenhouse Gas Management Plan. Alamos completed and submitted a Greenhouse Gas Management Plan to ECCC in May 2024. The EA Decision Statement was subsequently amended July 26, 2024, and removed EA condition 11 pursuant to subsection 308(1)

of the Budget Implementation Act, 2024, because the condition was “solely related to transboundary atmospheric effects, and as such, could not have been included in a decision statement issued under the amended IAA” (ECCC letter correspondence to Prodigy, July 2024).

Nonetheless, Alamos is committed to managing greenhouse gas emissions from the Project and is working towards reducing its dependence on its LNG Plant for energy by establishing the infrastructure required to use electrical energy from the grid. In 2025, in partnership with Batchewana First Nation, construction on the 115kV transmission line from Hawk Junction to the Project site began.

APPENDIX A: CONCORDANCE TABLE – AMENDED EA CONDITIONS (JULY 2024) VS ANNUAL REPORT SECTIONS

July 26, 2024 Amended EA Conditions		Annual Report Section
Applicable Sections	EA Condition #	
General Conditions		
Qualified Individuals / Best Practices	2.1	Section 2.A-1
Consultation	2.2-2.3	Section 2.A-2
Follow-up and Adaptive Management	2.4-2.8	Section 2.A-3
Annual Reporting	2.9-2.10	Section 2.A-4
Information Sharing	2.11-2.12	Section 2.A-5
Change of Proponent	2.13	Section 2.A-6
Change to the Designated Project	2.14-2.15	Section 2.A-7
Fish and Fish Habitat	3.1-3.19	Section 2.B
Migratory Birds	4.1-4.5	Section 2.C
Health of Indigenous Peoples	5.1-5.4	Section 2.D
Current Use of Lands and Resources for Traditional Purposes	6.1-6.6	Section 2.E
Wetlands	7.1-7.3	Section 2.F
Accidents and Malfunctions	8.1-8.5	Section 2.G
Schedules	9.1-9.5	Section 2.H
Record Keeping	10.1-10.3	Section 2.I
Greenhouse Gas Management Plan	11 (revoked)	Section 2.J

APPENDIX B: SCHEDULE OF EA DECISION STATEMENT CONDITIONS (AS PER EA CONDITION 9.1)

Table 1: Schedule of Key Project Milestones

Project Phase	Years	Estimated Duration
Construction	2 years	February 2021 to May 2023
Operation	15 years	Commissioning: May 2023 to November 2023 Commercial Production: November 2023 to December 2038
Decommissioning (Active Closure)	3 years	January 2039 to December 2041
Abandonment (Post-Closure)	Approximately 50 years; includes 7 years of Active Monitoring until closure objectives are satisfied (in addition to Active Monitoring undertaken during Decommissioning) followed by Passive Abandonment	Active Monitoring: January 2042 to December 2048 Full Abandonment including Passive Abandonment: January 2042 to December 2091

Table 2: Schedule of Decision Statement Conditions (per EA Decision Statement Condition 9.1)

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
General Conditions				
Qualified Individuals / Best Practices				
2.1	<p>“The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge available at the time the Proponent takes action, including community and Indigenous traditional knowledge, are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies.”</p>	January 2019	End of all Project phases (on or about December 2091)	
Consultation				
2.2	<p>“The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement:</p> <p>2.2.1 provide a written notice of the opportunity for the party or parties being consulted to present their views and information on the subject of the consultation;</p> <p>2.2.2 provide all information available and relevant on the scope and the subject matter of the consultation and a period of time taking into account the views of the party or parties being consulted, not to be less than 15 days, to prepare their views and information;</p> <p>2.2.3 undertake an impartial consideration of all views and information presented by the party or parties being consulted on the subject matter of the consultation; and</p> <p>2.2.4 advise in a timely manner the party or parties being consulted on how the views and information received have been considered by the Proponent.”</p>	January 2019	End of all Project phases (on or about December 2091)	Alamos continues to consult with stakeholders and Indigenous groups on EA conditions and related topics.
2.3	<p>“The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this Decision Statement, communicate with each Indigenous group with respect to the manner to satisfy the consultation requirements referred to in condition 2.2, including methods of notification, the type of information and the period of time to be provided when seeking input, the process to be used by the Proponent to undertake impartial consideration of all views and information presented on the subject of the consultation, and the period of time and the means to advise Indigenous groups of how their views and information were considered by the Proponent.”</p>	January 2019	End of all Project phases (on or about December 2091)	
Follow-up and Adaptive Management				

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
2.4	<p>“The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, determine, as part of the development of each follow-up program and in consultation with the party or parties being consulted during the development, the following information:</p> <p>2.4.1 the methodology, location, frequency, timing and duration of monitoring associated with the follow-up program;</p> <p>2.4.2 the scope, content and frequency of reporting of the results of the follow-up program;</p> <p>2.4.3 the levels of environmental change relative to baseline conditions that would require the Proponent to implement modified or additional mitigation measure(s), including instances where the Proponent may require Designated Project activities to be stopped; and</p> <p>2.4.4 the technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change referred to in condition 2.4.3 have been reached or exceeded and the timing for implementing the modified or additional mitigation measures.”</p>	October 2020	January 2021	
2.5	<p>“The Proponent shall maintain the information referred to in condition 2.4 during the implementation of each follow-up program in consultation with the party or parties being consulted during the development of each follow-up program.”</p>	January 2021	End of all Project phases (on or about December 2091)	
2.6	<p>“The Proponent shall provide the follow-up programs referred to in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3 to the Agency and to the party or parties being consulted during the development of each follow-up program prior to the implementation of each follow-up program. The Proponent shall also provide any update(s) to the Agency and to the party or parties being consulted during the development of each follow-up program within 30 days of the follow-up program being updated.”</p>	January 2021	On or about December 2048	Updates to be provided if/when necessary.

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
2.7	<p>“The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement and in consultation with the party or parties being consulted during the development of the follow- up program:</p> <p>2.7.1 conduct the follow-up program according to the information determined pursuant to condition 2.4;</p> <p>2.7.2 undertake monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure(s);</p> <p>2.7.3 determine whether modified or additional mitigation measures are required based on the monitoring and analysis undertaken pursuant to condition 2.7.2; and</p> <p>2.7.4 if modified or additional mitigation measures are required pursuant to condition 2.7.3, develop and implement these mitigation measures in a timely manner and monitor them pursuant to condition 2.7.2.”</p>	February 2021 at the earliest	On or about December 2048	<p>Follow-up programs have been developed and outline the requirements for monitoring and implementation of mitigations.</p> <p>Follow-up programs allow for adaptive management to ensure mitigations where required are changed or amended to manage the identified impact.</p> <p>Project follow-up programs verify the accuracy of the EA and describe the process for mitigating any additional effects identified during monitoring.</p>
2.8	<p>“Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss with each Indigenous group opportunities for their participation in the development and implementation of the follow-up program, including the analysis of the follow- up results and whether modified or additional mitigation measures are required, as set out in condition 2.7”</p>	October 2020	End of all Project phases (on or about December 2091)	
Annual Reporting				

Alamos Gold Inc. – Island Gold District - Magino Mine
 2025 Annual Report to the Impact Assessment Agency of Canada

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
2.9	<p>“The Proponent shall, commencing in the reporting year during which the Proponent begins the implementation of the conditions set out in this Decision Statement, prepare an annual report that sets out:</p> <p>2.9.1 the activities undertaken by the Proponent in the reporting year to comply with each of the conditions set out in this Decision Statement;</p> <p>2.9.2 how the Proponent complied with condition 2.1;</p> <p>2.9.3 for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation;</p> <p>2.9.4 the information referred to in conditions 2.4 and 2.5 for each follow-up program;</p> <p>2.9.5 the results of the follow-up program requirements identified in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3;</p> <p>2.9.6 any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.7;</p> <p>2.9.7 any change(s) to the Designated Project in the reporting year for which the Proponent determined that condition 2.14 did not apply.”</p>	January 2019	On or about December 2041	
2.10	<p>“The Proponent shall submit to the Agency the annual report referred to in condition 2.9, including a plain language executive summary in both official languages, no later than March 31 following the reporting year to which the annual report applies.”</p>	March 2020 (2019 Annual Report)	On or about December 2041	Annual reports have been submitted every year since the 2019 Annual Report.
Information Sharing				
2.11	<p>“The Proponent shall publish on the Internet, or any medium which is publicly available, the annual reports and the executive summaries referred to in conditions 2.9 and 2.10, the offsetting plan(s) referred to in condition 3.14, the reports related to accidents and malfunctions referred to in conditions 8.4.2 and 8.4.3, the communication plans referred to in conditions 6.1 and 8.5, the schedules referred to in conditions 9.1, and 9.2, and any update(s) or revision(s) to the above documents, upon submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available for 25 years following the end of operation, or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall notify the Agency and Indigenous groups of the availability of these documents within 48 hours of their publication.”</p>	April 2020 (2019 Annual Report)	On or about December 2063	Alamos makes all versions of the documentation accessible to the public upon request at their offices in Dubreuilville and Toronto, Ontario, or upon request at info@alamosgold.com or 1-866-788-8801.
2.12	<p>“When the development of a plan is a requirement of a condition set out in this Decision Statement, the Proponent shall submit the plan to the Agency prior to construction, unless otherwise required through the condition.”</p>	October 2020	January 2021	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
Change of Proponent				
2.13	"The Proponent shall notify the Agency and Indigenous groups in writing no later than 30 days after the day on which there is a transfer of ownership, care, control or management of the Designated Project in whole or in part."	As required	End of all Project phases (on or about December 2091)	On July 12, 2024, Alamos Gold Inc., acquired Prodigy Gold Inc. as its subsidiary from Argonaut Gold Inc. The Agency was notified August 9, 2024.
Change to the Designated Project				
2.14	"If the Proponent is proposing to carry out the Designated Project in a manner other than described in condition 1.7, the Proponent shall notify the Agency in writing in advance of carrying out the proposed activities. As part of the notification, the Proponent shall provide: 2.14.1 a description of the proposed change(s) to the Designated Project and the environmental effects that may result from the proposed change(s); 2.14.2 any modified or additional measure to mitigate any environmental effect that may result from the proposed change(s) and any modified or additional follow-up requirement; and 2.14.3 an explanation of how, taking into account any modified or additional mitigation measure referred to in condition 2.14.2, the environmental effects that may result from the proposed change(s) may differ from the environmental effects of the Designated Project identified during the environmental assessment."	As required	End of all Project phases (on or about December 2091)	No changes to the Designated Project that may result in adverse environmental effects have been proposed/initiated to date. Some notable changes include: Addition of the LNG Plant in 2023; Construction of haulage road connecting Island Gold Mine and Magino Mine, and expansion of the Magino Mill.
2.15	"The Proponent shall provide the Agency any additional information required by the Agency about the proposed change(s) referred to in condition 2.14, which may include the results of consultation with Indigenous groups and relevant authorities on the proposed change(s) and environmental effects referred to in condition 2.14.1 and the modified or additional mitigation measures and follow-up requirements referred to in condition 2.14.2."	As required	End of all Project phases (on or about December 2091)	
Fish and Fish Habitat				

Alamos Gold Inc. – Island Gold District - Magino Mine
 2025 Annual Report to the Impact Assessment Agency of Canada

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
3.1	“The Proponent shall develop, prior to construction, and implement, during all phases of the Designated Project, measures to control erosion and sedimentation within the project study area. The Proponent shall submit these measures to the Agency before implementing them. Among other measures, the Proponent shall:	October 2020	On or about December 2041	
	3.1.1 use ditches and diversion berms to maintain stream bank stability; and	February 2021		
	3.1.2 use physical barriers to reduce runoff from disturbed areas.”	February 2021		
3.2	“The Proponent shall comply with the Metal and Diamond Mining Effluent Regulations and the pollution prevention provisions of the <i>Fisheries Act</i> .”	February 2021	End of all Project phases (on or about December 2091)	
3.3	“The Proponent shall collect, during construction and operation, contact water for reuse in Designated Project activities, and treat excess contact water that cannot be reused.”	May 2021	On or about December 2038	
3.4	“The Proponent shall control the flow at which excess water referred to in condition 3.3 is discharged to limit disturbance of lake bed material.”	May 2021	On or about December 2038	
3.5	“The Proponent shall install, prior to operation, and use a cyanide destruction circuit during operation to reduce cyanide concentrations in tailings before the tailings are directed to the tailings management facility.”	June 2023	On or about December 2038	
3.6	“The Proponent shall, after the end of operation and until the open-pit lake is filled, collect and direct contact water to the open-pit lake.”	On or about January 2039	On or about December 2080	
3.7	“The Proponent shall, prior to operation, implement seepage control measures at the tailings management facility and maintain these measures during operation and decommissioning.”	October 2022	On or about December 2041	
3.8	“The proponent shall not connect the open-pit lake until such time as water in the open-pit lake complies with the pollution prevention provisions of the <i>Fisheries Act</i> .”	June 2039	June 2082	Corresponds to 43 years of pit filling, commencing at the end of operations phase. May start up to 3 years earlier, if mining stops and only ore stockpile processing is happening at end of life.
3.9	“The Proponent shall treat water taking into account the Canadian Council of Ministers of the Environment’s <i>Canadian Water Quality Guidelines for Protection of Aquatic Life</i> .”	May 2021	On or about December 2038	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
3.10	“The Proponent shall develop, prior to the start of blasting activities in or near water and in consultation with Indigenous groups, and implement, during blasting activities in or near water, mitigation measures to avoid or prevent adverse effects to fish and fish habitat from the use of explosives in a manner consistent with the <i>Fisheries Act</i> and its regulations. When developing these measures, the Proponent shall take into account Fisheries and Oceans Canada's Measures to avoid causing harm to fish and fish habitat including aquatic species at risk as it pertains to the use of explosives in or near water. The Proponent shall submit these measures to the Agency before implementing them.”	October 2020	On or about December 2038	
3.11	“The Proponent shall conduct in-water construction activities during timing windows of least risk for the area, unless otherwise agreed to by relevant federal and provincial authorities. If in-water construction activities cannot be conducted during identified timing windows of least risk, the Proponent shall develop and implement additional mitigation measures, in consultation with Indigenous groups and Fisheries and Oceans Canada, to protect fish during sensitive life stages.”	November 2021	December 2025	
3.12	“The Proponent shall salvage and relocate fish prior to conducting any Designated Project activity requiring removal of fish habitat in a manner consistent with any license issued under the <i>Fisheries Act</i> and its regulations. The Proponent shall salvage and relocate fish in consultation with Indigenous groups and to the satisfaction of Fisheries and Oceans Canada and other relevant authorities.”	October 2020	December 2025	Initial fish salvaging was conducted throughout the site in 2020-2021. Additional fish salvage was performed in sections of McVeigh Creek in 2022. Additional fish salvage is currently planned for 2027, may get pulled into 2026.
3.13	“The Proponent shall design, install and operate the water intake structures in Goudreau Lake in a manner which reduces the incidental capture of fish by entrainment and impingement through the use of an appropriately sized fish screen, taking into account Fisheries and Oceans Canada's Freshwater Intake End- of-Pipe Fish Screen Guideline and in a manner consistent with the <i>Fisheries Act</i> and its regulations.”	February 2021	On or about March 2041	Currently not taking water from Goudreau Lake as it is not permitted.

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
3.14	<p>“The Proponent shall develop, to the satisfaction of Fisheries and Oceans Canada and Environment and Climate Change Canada and in consultation with Indigenous groups, any offsetting plan(s) related to any residual serious harm to fish associated with the carrying out of the Designated Project. The Proponent shall implement the plan. The Proponent shall submit any approved offsetting plan(s) to the Agency prior to implementation.”</p>	January 2019	On or about January 2035	Contingency measures to be implemented and additional monitoring to be undertaken if monitoring at the end of 10 years following construction indicates that compensation/offset measures are not completed as specified in the plans, and/or are not functioning as predicted.
3.15	<p>“The Proponent shall, for any fish habitat offsetting measure(s) proposed in any offsetting plan(s) referred to in condition 3.14 that may cause adverse environmental effects not considered in the environmental assessment, develop and implement, following consultation with Indigenous groups, Fisheries and Oceans Canada and Environment and Climate Change Canada, measures to mitigate those effects. The Proponent shall submit these measures to the Agency before implementing them.”</p>	N/A	N/A	<p>No measures are proposed in plan(s) referred to in EA condition 3.14 that may cause adverse environmental effects not considered in the EA.</p> <p>The Fisheries Act Authorization and fish habitat plan will potentially be updated in 2026 following engagement with DFO.</p>

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
3.16	<p>“The Proponent shall develop, prior to the start of blasting activities in or near water and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat, including spawning habitat, caused by blasting. The Proponent shall implement the follow-up program during blasting activities. As part of the implementation of the follow-up program, the Proponent shall:</p> <p>3.16.1 monitor instantaneous pressure and particle velocity during the first blasting event;</p> <p>3.16.2 if results of the monitoring referred to in condition 3.16.1 indicate an instantaneous pressure change greater than 100 kilo Pascals in the swim bladder of fish or that blasting produces a peak particle velocity greater than 13 millimeter per second in a spawning bed, develop, prior to the next blasting event and in consultation with relevant authorities, modified or additional mitigation measures pursuant to condition 2.7 in order to protect fish and fish habitat, including spawning habitat; and</p> <p>3.16.3 implement the modified or additional mitigation measures referred to in condition 3.16.2 during all subsequent blasting events. The Proponent shall submit these measures to the Agency before implementing them.”</p>	October 2020	December 2025	<p>Alamos, and previously Prodigy, have consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring. Contingency measures to be implemented and additional monitoring to be undertaken if monitoring at the end of 10 years following construction indicates that compensation/offset measures are not completed as specified in the plans, and/or are not functioning as predicted.</p>

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
3.17	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures for the salvage and relocation of fish and as it pertains to the incidental capture of fish by entrainment and impingement from the Designated Project. The Proponent shall implement the follow-up program during all phases of the Designated Project.”</p>	October 2020	On or about December 2038	<p>Alamos, and previously Prodigy, have consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring. Contingency measures to be implemented and additional monitoring to be undertaken if monitoring at the end of 10 years following construction indicates that compensation/offset measures are not completed as specified in the plans, and/or are not functioning as predicted</p>

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
3.18	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects on fish and fish habitat caused by changes in water and sediment quality in Otto Lake and Herman Lake. The Proponent shall implement the follow-up program during all phases of the Designated Project, including the environmental effects monitoring requirements set out in Schedule 5 of the <i>Metal and Diamond Mining Effluent Regulations</i> . As part of the implementation of the follow-up program, the Proponent shall:	October 2020	On or about December 2041	Alamos, and previously Prodigy, have consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	3.18.1 monitor, at least quarterly, concentrations of total phosphorus, mercury, copper, silver, sulphate and ammonia in water during operation;	May 2023	On or about December 2038	
	3.18.2 monitor, at least annually, concentrations of copper, arsenic, cadmium, manganese, mercury and total phosphorus in sediments during operation;	May 2023	On or about December 2038	
	3.18.3 monitor fish health through fish tissue sampling and fish population studies. Monitoring shall include lower trophic level indicator species and shall include monitoring offish abundance, fish population structure and other fish health metrics that shall be determined in consultation in Indigenous groups and relevant authorities. The Proponent shall conduct monitoring for one year prior to operation and at least twice a year for the first three years of operation and shall:	October 2021	December 2025	
	3.18.3.1 if the results of monitoring during the first three years of operation demonstrate that no adverse environmental effects to fish and fish habitat from Designated Project activities are occurring, continue monitoring every three years after the first three years for a duration that shall be determined in consultation with Indigenous groups and relevant authorities; or	October 2022	To be determined in consultation with Indigenous groups and relevant authorities	
	3.18.3.2 if the results of monitoring during the first three years of operation demonstrate that adverse environmental effects to fish and fish habitat from Designated Project activities are occurring, determine, in consultation with Indigenous groups and relevant authorities, with what frequency and for what duration additional monitoring shall occur;	October 2022	To be determined in consultation with Indigenous groups and relevant authorities	
	3.18.4 monitor nutrient levels, algae abundance, and dissolved oxygen levels. In doing so the Proponent shall: 3.18.4.1 conduct monitoring one year prior to operation;	September 2021	On or about April 2023	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	3.18.4.2 conduct monitoring at least twice a year for the first three years of operation and:	October 2022	On or about December 2025	
	3.18.4.2.1 if the results of the monitoring referred to in condition 3.18.4.2 demonstrate a statistically significant change with the results of monitoring referred to in condition 3.18.4.1, conduct a fish habitat utilization survey to verify that these changes do not cause adverse environmental effects to fish and fish habitat. The Proponent shall determine the methodology, the frequency and the duration of this survey in consultation with Indigenous groups and relevant authorities.	October 2022	After December 2025 (survey duration to be determined in consultation with Indigenous groups and relevant authorities)	
	3.18.4.3 after the third year of operation, the Proponent shall: 3.18.4.3.1 continue monitoring of nutrient levels, algae abundance and dissolved oxygen levels every three years for a duration that shall be determined in consultation with Indigenous groups and relevant authorities, if the results of monitoring referred to in condition 3.18.4.2 demonstrate that no adverse environmental effects to fish and fish habitat from Designated Project activities are occurring; or	After December 2025	To be determined in consultation with Indigenous groups and relevant authorities	
	3.18.4.3.2 continue monitoring at a frequency and duration that shall be determined in consultation with Indigenous groups and relevant authorities, if the results of monitoring referred to in condition 3.18.4.2 demonstrate that adverse environmental effects to fish and fish habitat from Designated Project activities are occurring.	After December 2025	To be determined in consultation with Indigenous groups and relevant authorities	
	3.18.5 if results of the monitoring referred to in conditions 3.18.1, 3.18.2, 3.18.3 or 3.18.4 or the results of the fish habitat utilization survey referred to in condition 3.18.4.2.1 demonstrate that modified or additional mitigation measures are required to protect fish and fish habitat from changes to water and sediment quality, develop and implement modified or additional mitigation measures pursuant to condition 2.7, which shall include, at a minimum, the installation and use of an effluent treatment facility. The Proponent shall submit these measures to the Agency before implementing them.”	On or about September 2021	To be determined in consultation with Indigenous groups and relevant authorities	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
3.19	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat in Otto Lake, Herman Lake and Goudreau Lake from changes in groundwater quality caused by the Designated Project. The Proponent shall implement the follow-up program during all phases of the Designated Project in consultation with Indigenous groups. As part of the implementation of the follow-up program, the Proponent shall:</p>	October 2020	On or about December 2045 (at a minimum, monitoring program will be re-assessed to determine groundwater monitoring requirements, and to be determined based on the length of time needed to develop and implement the modified or additional mitigation measures)	Alamos, and previously Prodigy, has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	3.19.1 monitor groundwater quality using as benchmarks the comparative standards for water quality identified by the Proponent in Table 7-54 of the Environmental Impact Statement; and	April 2021	On or about December 2045 (at a minimum, monitoring program will be re-assessed to determine groundwater monitoring requirements, and to be determined based on the length of time needed to develop and implement the modified or additional mitigation measures)	
	3.19.2 if the results of the monitoring referred to in condition 3.19.1 demonstrate that modified or additional mitigation measures are required to mitigate adverse environmental effects on fish and fish habitat of changes in groundwater quality caused by the Designated Project, develop and implement modified or additional mitigation measures pursuant to condition 2.7. The Proponent shall submit these measures to the Agency before implementing them.”	Spring 2022	On or about December 2045 (at a minimum, monitoring program will be re-assessed to determine groundwater monitoring requirements, and to be determined based on the length of time needed to develop and implement the modified or additional mitigation measures)	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
Migratory Birds				
4.1	“The Proponent shall carry out the Designated Project in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's <i>Avoidance Guidelines</i> and the risk of incidental take. The Proponent's actions when carrying out the Designated Project shall be in compliance with the <i>Migratory Birds Convention Act, 1994</i> , the <i>Migratory Birds Regulations</i> and with the <i>Species at Risk Act</i> .”	February 2021	On or about December 2048	
4.2	“The Proponent shall control lighting required during all phases of the Designated Project, including direction, timing and intensity, to avoid adverse environmental effects on migratory birds, while meeting health and safety requirements.”	February 2021	On or about December 2048	
4.3	“The Proponent shall undertake, in consultation with Indigenous groups and relevant authorities, progressive reclamation of the project study area. The Proponent shall identify, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, plant species native to the area of the Designated Project to use for revegetation as part of the progressive reclamation, including species suitable to create habitat for migratory birds.”	June 2020	On or about December 2038	
4.4	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the use by migratory birds of surface water facilities in the project study area. As part of the implementation of the follow-up program, the Proponent shall:	October 2020	January 2021	Alamos, and previously Prodigy, have consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the
	4.4.1 monitor, at times migratory birds may be present in the project study area, the use by migratory birds of the tailings management facility and the Water Quality Control Pond during all phases of the Designated Project until such time that water quality in the tailings management facility and the Water Quality Control Pond meet legislative requirements and water quality objectives. The water quality objectives are to be established using an ecological risk based approach, developed in consultation with Indigenous groups and relevant authorities;	April 2023	December 2041	
	4.4.2 monitor, at times migratory birds may be present in the project study area, the use by migratory birds of the open-pit lake during decommissioning. The Proponent shall determine, in consultation with indigenous groups and relevant authorities, the frequency and duration of the monitoring during decommissioning; and	On or about January 2039	On or about December 2041	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	4.4.3 if results of the monitoring referred to in conditions 4.4.1 or 4.4.2 indicate that migratory birds use the tailings management facility, the Water Quality Control Pond or the open-pit lake, develop, in consultation with Indigenous groups, and implement deterrence measures pursuant to condition 2.7. The Proponent shall submit these measures to the Agency before implementing them”	April 2023	December 2041	accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
4.5	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures to avoid harm to migratory birds, their eggs, and nests, including the mitigation measures used to comply with conditions 4.1 to 4.3. As part of the development of the follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of the progressive reclamation referred to in condition 4.3. The Proponent shall implement the follow-up program during all phases of the Designated Project. As part of the implementation of the follow-up program, the Proponent shall:	October 2020	On or about December 2045	Alamos, and previously Prodigy, have consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	4.5.1 conduct migratory bird surveys annually for the first three years following completion of construction to assess changes in migratory bird populations caused by the Designated Project. The Proponent shall determine the methodology for the migratory bird surveys in consultation with Indigenous groups and relevant authorities. The Proponent shall determine, in consultation with Indigenous groups and relevant authorities and based on the results of the initial surveys, if additional surveys are required after the first three years following completion of construction and at what frequency and in which locations these additional surveys shall occur; and	November 2023	To be determined in consultation with Indigenous groups and relevant authorities	
	4.5.2 monitor the effectiveness of the progressive reclamation referred to in condition 4.3, including the establishment of native plant species to create habitat for migratory birds, annually during operation and during the first three years of decommissioning and every five years thereafter. The Proponent shall monitor the effectiveness of the progressive reclamation referred to in condition 4.3 until the Proponent has determined, in consultation with Indigenous groups and relevant authorities, that the performance indicators have been met.”	November 2023	To be determined in consultation with Indigenous groups and relevant authorities	
Health of Indigenous Peoples				

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
5.1	“The Proponent shall develop, prior to construction, measures to mitigate emissions of dust and fugitive particulate generated by the Designated Project, including dust associated with mine vehicles on roads located within the property boundary, that take into account the standards and criteria set out in the Canadian Council of Ministers of the Environment’s <i>Canadian Ambient Air Quality Standards</i> and Ontario’s <i>Ambient Air Quality Criteria</i> . The Proponent shall submit these measures to the Agency before implementing them. The Proponent shall implement these measures during construction, operation and the first three years of decommissioning. “	October 2020	On or about December 2041	
5.2	“The Proponent shall undertake reagent handling and ore processing activities in an enclosed space equipped with a dust collection system. “	June 2023	On or about March 2039	
5.3	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on the health of Indigenous Peoples caused by increased concentration of air contaminants, including total suspended particulates, particulate matter (PM ₁₀), fine particulate matter (PM _{2.5}), sulphur dioxide, nitrogen dioxide and cadmium. As part of the follow-up program, the Proponent shall:	October 2020	January 2021	Alamos, and previously Prodigy, have consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of
	5.3.1 identify, prior to construction, monitoring locations for air contaminants within areas used by Indigenous groups for traditional purposes for which maximum concentrations of air contaminants were predicted by the Proponent during the environmental assessment, as identified in Appendix N of the final response to Information Request 01 (Canadian Environmental Assessment Registry Reference Number 80044, Document Number 26);	January 2021	December 2022	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	5.3.2 monitor, during construction, operation and the first three years of decommissioning, air contaminants at the monitoring locations identified pursuant to condition 5.3.1, using as benchmarks the standards and criteria set out in the Canadian Council of Ministers of the Environment's <i>Canadian Ambient Air Quality Standards</i> and Ontario's <i>Ambient Air Quality Criteria</i> . The Proponent shall monitor fine particulate matter (PM _{2.5}) in real-time, particulate matter (PM ₁₀) and cadmium at a minimum every 6 days and total suspended particulates, sulphur dioxide and nitrogen dioxide at a frequency that shall allow the Proponent to monitor adverse environmental effects on human health. The Proponent shall determine the frequency of monitoring for total suspended particulates, sulphur dioxide and nitrogen dioxide in consultation with Indigenous groups and relevant authorities during the development of the follow-up program;	August 2021	On or about December 2041	mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	5.3.3 notify the Agency and Indigenous groups in writing within 24 hours of any exceedance(s) observed by the Proponent during monitoring referred to in condition 5.3.2 of 1-hour limits or 24-hour limits of the standards and criteria set out in the Canadian Council of Ministers of the Environment's <i>Canadian Ambient Air Quality Standards</i> and Ontario's <i>Ambient Air Quality</i> , except for fine particulate matter (PM _{2.5}); and	August 2021	On or about December 2041	
	5.3.4 determine, in consultation with Indigenous groups and relevant authorities, the thresholds for concentration of fine particulate matter (PM _{2.5}) above which the Proponent shall notify Indigenous groups. “	October 2020	January 2021	
5.4	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures as it pertains to the adverse environmental effects on health of Indigenous Peoples caused by contamination of water and fish. As part of the follow-up program, the Proponent shall:	October 2020	January 2021	Alamos, and previously Prodigy, have consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on
	5.4.1 identify, prior to construction, fish species that shall be monitored, waterbodies where Indigenous use is expected and where contaminants shall be monitored;	October 2020	January 2021	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	5.4.2 monitor mercury, methylmercury, cobalt, lead and arsenic in surface water in Otto Lake and other downstream waterbodies identified pursuant to condition 5.4.1 during all phases of the Designated Project;	On or about February 2021	On or about December 2041 (monitoring for background and receiver monitoring locations will be re-assessed after the 10-year sampling period)	implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	5.4.3 monitor mercury, methylmercury, cobalt, lead and arsenic in surface water in Goudreau Lake and other downstream waterbodies identified pursuant to condition 5.4.1 during decommissioning;	On or about December 2038	On or about December 2041	
	5.4.4 monitor mercury, methylmercury, lead, arsenic and cobalt in fish tissue in Otto Lake and other downstream waterbodies identified pursuant to condition 5.4.1 every three years during all phases of the Designated Project, starting the first year of construction, and every five years after the end of decommissioning. The Proponent shall determine, in consultation with Indigenous groups and relevant authorities, if additional monitoring must be implemented after the end of decommissioning; and	October (Fall) 2021	To be determined in consultation with Indigenous groups and relevant authorities	
	5.4.5 monitor mercury, methylmercury, lead, arsenic and cobalt in fish tissue in Goudreau Lake and other downstream waterbodies identified pursuant to condition 5.4.1 every three years starting at the beginning of decommissioning and for a duration that shall be determined in consultation with Indigenous groups and relevant authorities. “	On or about January 2039	On or about December 2041 (at a minimum, duration to be determined in consultation with Indigenous groups and relevant authorities)	
Current Use of Lands and Resources for Traditional Purposes				

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
6.1	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a communication plan to share information related to the Designated Project and the adverse environmental effects of the Designated Project with Indigenous groups. The Proponent shall implement and maintain the communication plan up-to-date during all phases of the Designated Project. The communication plan shall include procedures, including timing and methods, for sharing information on the following:</p> <p>6.1.1 the location and timing of Designated Project activities that may affect quality of experience to Indigenous uses of lands for traditional purposes caused by changes in dust, noise or light within the property boundary and that may permanently or temporarily affect navigation within the project study area;</p> <p>6.1.2 the results of the follow-up program referred to in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2, and 7.3, including any potential health risks, in plain language, and the modified or additional mitigation measures developed and implemented by the Proponent pursuant to condition 2.7 for each follow-up program.”</p>	October 2020	End of all Project phases (on or about December 2091)	Monitoring will be re-assessed following the period of Active Monitoring to determine if further action is needed as described in the <i>Closure Plan</i> .
6.2	<p>“The Proponent shall develop, as part of the communication plan referred to in condition in 6.1, procedures for Indigenous groups to provide feedback to the Proponent about adverse environmental effects caused by the Designated Project related to access to and use of lands for traditional purposes, and procedures for the Proponent to document and respond in a timely manner to the feedback received and demonstrate how issues have been addressed, including through the implementation of additional or modified mitigation measures. The Proponent shall implement these procedures during all phases of the Designated Project.”</p>	October 2020	End of all Project phases (on or about December 2091)	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
6.3	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a Historic Resources Management Plan for structures, sites, or things of historical, archaeological, paleontological, or architectural significance. The Proponent shall implement the plan during all phases of the Designated Project. As part of the plan, for any previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance discovered within the property boundary by the Proponent or brought to the attention of the Proponent by an Indigenous group or another party during any phase of the Designated project, the Proponent shall:</p> <p>6.3.1 immediately halt work at the location of the discovery, except for actions required to be undertaken to protect the integrity of the discovery;</p> <p>6.3.2 delineate an area with a radius of at least 30 meters around the discovery as a no-work zone and monitor any work conducted within 50 meters around the discovery;</p> <p>6.3.3 conduct an assessment at the location of the discovery;</p> <p>6.3.4 inform the Agency and Indigenous groups within 24 hours of the discovery, and allow Indigenous groups to monitor and participate in the archaeological work; and</p> <p>6.3.5 consult Indigenous groups and relevant authorities on the manner by which to comply with all applicable legislative or legal requirements and associated regulations and protocols respecting the discovery, recording, transferring and safekeeping of previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance.”</p>	September 2019	End of all Project phases (on or about December 2091)	
6.4	<p>“As part of the progressive reclamation referred to in condition 4.3, the Proponent shall:</p> <p>6.4.1 identify, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, species of interest to Indigenous peoples to use for revegetation as part of the progressive reclamation; and</p> <p>6.4.2 develop, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, measures to manage the spread of invasive species. The Proponent shall submit these measures to the Agency before implementing them.”</p>	June 2020	End of all Project phases (on or about December 2091)	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
6.5	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes caused by changes in the use of the project study area by mammals, including black bear (<i>Ursus americanus</i>) and moose (<i>Alces alces</i>). As part of the development of the follow-up program, the Proponent shall identify, in consultation with Indigenous groups and relevant authorities, species of mammals, in addition to black bear (<i>Ursus americanus</i>) and moose (<i>Alces alces</i>), that shall be monitored. If the results of the monitoring indicate that these mammal species use the property, the Proponent shall implement modified or additional mitigation measures pursuant to condition 2.7 to prevent the identified species of mammals from accessing Designated Project components.”</p>		End of all Project phases	<p>Alamos, and previously Prodigy, have consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.</p>

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
6.6	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of mitigation measures, including the mitigation measures referred to in conditions 6.1 to 6.4, as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes. The Proponent shall implement the follow-up program during all phases of the Designated Project.”</p>	October 2020	End of all Project phases (on or about December 2091)	<p>Alamos, and previously Prodigy, have consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.</p>
Wetlands				
7.1	<p>“The Proponent shall restore a minimum of 40 hectares of wetland within the property boundary. The Proponent shall determine, in consultation with Environment and Climate Change Canada, methods for restoration that are technically and economically feasible and that are appropriate for the project study area.”</p>	To be confirmed (toward the end of the operations phase)	December 2041	<p>As restoration of the wetland area will be done as part of the reclamation of the tailings management facility at closure, specific planning or action related to this EA condition will be initiated toward the end of the operations phase.</p>

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
7.2	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of restoration referred to in condition 7.1. As part of the development of the follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of the restoration. The Proponent shall monitor the effectiveness of the restoration from the start of the restoration until performance indicators are met.”</p>	October 2020	Until performance indicators are met.	<p>Alamos, and previously Prodigy, have consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.</p>

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
7.3	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the presence of snapping turtle (<i>Chelydra serpentina</i>) or snapping turtle eggs within the project study area. The Proponent shall implement the follow-up program during construction and operation. If the Proponent observes snapping turtle or snapping turtle eggs, the Proponent shall develop, in consultation with Indigenous groups and relevant authorities, modified or additional mitigation measures pursuant to condition 2.7, which shall include, at a minimum, the installation of exclusion fences around snapping turtle habitat, if technically feasible, or the relocation of snapping turtles outside of the project study area. The Proponent shall submit these measures to the Agency before implementing them.”</p>	October 2020	On or about December 2038	Alamos, and previously Prodigy, have consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
Accidents and Malfunctions				
8.1	<p>“The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects.”</p>	February 2021	End of all Project phases (on or about December 2091)	
8.2	<p>“The Proponent shall, prior to construction, consult with Indigenous groups and relevant authorities on the measures to be implemented to prevent accidents and malfunctions.”</p>	October 2020	On or before January 2021	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
8.3	<p>“The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, develop an accident and malfunction response plan in relation to the Designated Project. The accident and malfunction plan shall include:</p> <p>8.3.1 the types of accidents and malfunctions that may cause adverse environmental effects;</p> <p>8.3.2 the measures to be implemented in response to each type of accident and malfunction referred to in condition 8.3.1 to mitigate any adverse environmental effect(s) caused by the accident or malfunction; and</p> <p>8.3.3 the role of Indigenous groups in the implementation of the accident and malfunction plan.”</p>	October 2020	January 2021	Alamos, and previously Prodigy, have consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation.

8.4	<p>“In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall immediately implement the measures appropriate to the accident or malfunction as described in the accident and malfunction response plan referred to in condition 8.3.2 and shall:</p> <p>8.4.1 notify, as soon as possible, Indigenous groups and relevant authorities of the accident or malfunction, and notify the Agency in writing no later than 24 hours following the accident or malfunction. For the notification to Indigenous groups and the Agency, the Proponent shall specify:</p> <p>8.4.1.1 the date the accident or malfunction occurred;</p> <p>8.4.1.2 a description of the accident or malfunction;</p> <p>8.4.1.3 a list of any substances potentially released in the environment as a result of the accident or malfunction.</p> <p>8.4.2 submit a written report to the Agency no later than 30 days after the day on which the accident or malfunction occurred. The written report shall include:</p> <p>8.4.2.1 a detailed description of the accident or malfunction and of its adverse environmental effects and any associated potential health risks;</p> <p>8.4.2.2 a description of the measures that were taken by the Proponent to mitigate the adverse environmental effects caused by the accident or malfunction;</p> <p>8.4.2.3 any view(s) from Indigenous groups and advice from relevant authorities received with respect to the accident or malfunction, its adverse environmental effects, the associated potential health risks and the measures taken by the Proponent to mitigate these adverse environmental effects;</p> <p>8.4.2.4 a description of any residual adverse environmental effects and any modified or additional measures required by the Proponent to mitigate residual adverse environmental effects; and</p> <p>8.4.2.5 details concerning the implementation of the accident or malfunction response plan referred to in condition 8.3</p> <p>8.4.3 submit a written report to the Agency no later than 90 days after the day on which the accident or malfunction occurred that includes a description of changes made to avoid a subsequent occurrence of the accident or malfunction and of the modified or additional measure(s) implemented by the Proponent to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation, taking into account the information submitted in the written report pursuant to condition 8.4.2. The report shall include all additional views from Indigenous groups and advice from relevant authorities received by the Proponent since the views and advice referred to in condition 9.4.2.3 were received by the Proponent.” [It is understood that the reference to 9.4.2.3 should be 8.4.2.3; this is an error in the original and amended Decision Statements. There is no condition 9.4.2.3.]</p>	February 2021 (to be implemented as required)	End of all Project phases (on or about December 2091)	This EA condition will be implemented if/when accidents or malfunctions occur.
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Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
8.5	<p>“The Proponent shall develop a communication plan in consultation with Indigenous groups. The Proponent shall develop the communication plan prior to construction and shall implement and keep it up to date during all phases of the Designated Project. The plan shall include:</p> <p>8.5.1 the types of accident and malfunction requiring the Proponent to notify the respective Indigenous groups;</p> <p>8.5.2 the manner by which Indigenous groups shall be notified by the Proponent of an accident or malfunction and of any opportunities for the Indigenous groups to assist in the response to the accident or malfunction; and</p> <p>8.5.3 the contact information of the representatives of the Proponent that the Indigenous groups may contact and of the representatives of the respective Indigenous groups to which the Proponent provides notification.”</p>	October 2020	January 2021	
Schedules				
9.1	<p>“The Proponent shall submit to the Agency a schedule for all conditions set out in this Decision Statement no later than 60 days prior to the start of construction. This schedule shall detail all activities planned to fulfill each condition set out in this Decision Statement and the commencement and estimated completion month(s) and year(s) for each of these activities.”</p>	October 2020	October 2020	The initial version of this schedule was submitted in October 2020. This document is the annual update.
9.2	<p>“The Proponent shall submit to the Agency a schedule outlining all activities required to carry out all phases of the Designated Project no later than 60 days prior to the start of construction. The schedule shall indicate the commencement and estimated completion month(s) and year(s) and duration of each of these activities.”</p>	October 2020	October 2020	
9.3	<p>“The Proponent shall submit to the Agency in writing an update to schedules referred to in conditions 9.1 and 9.2 every year no later than March 31, until completion of all activities referred to in each schedule.”</p>	March 2021	On or about December 2048	An initial version of the two schedules was submitted in October 2020. Subsequent versions of both schedules will continue to be incorporated into the annual IAAC Reports.

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Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
9.4	“The Proponent shall provide to the Agency revised schedules if any change is made to the initial schedules referred to in conditions 9.1 and 9.2 or to any subsequent update(s) referred to in condition 9.3, upon revision of the schedules.”	As required	On or about December 2048	
9.5	“The Proponent shall provide Indigenous groups with the schedules referred to in conditions 9.1 and 9.2 and the updates or revisions to the initial schedules pursuant to condition 9.3 and 9.4 at the same time the Proponent provides these documents to the Agency.”	October 2020	On or about December 2048	
Record Keeping				
10.1	“The Proponent shall maintain all records relevant to the implementation of the conditions set out in this Decision Statement. The Proponent shall retain the records and make them available to the Agency throughout construction and operation and for 25 years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall provide the aforementioned records to the Agency upon demand within a timeframe specified by the Agency.”	January 2019	On or about December 2063	
10.2	“The Proponent shall retain all records referred to in condition 10.1 at a facility in Canada and shall provide the address of the facility to the Agency. The Proponent shall notify the Agency at least 30 days prior to any change to the physical location of the facility where the records are retained, and shall provide to the Agency the address of the new location.”	January 2019	On or about December 2063	
10.3	“The Proponent shall notify the Agency of any change to the contact information of the Proponent included in this Decision Statement.”	As required	End of all Project phases (on or about December 2091)	
Greenhouse Gas Management Plan				
11	Revoked in the amended EA Decision Statement, July 2024			

APPENDIX C: SCHEDULE OF ALL ACTIVITIES (AS PER EA CONDITION 9.2)

Table 3: Schedule of All Activities (per EA Decision Statement Condition 9.2)

Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration	Relevant Notes
#	Description				
Construction (2 years - February 2021 to May 2023)					
1	Clearing, grubbing and site grading required for the construction of the following project components:	February 2021	February 2024	3 years	No clearing during May 15 - August 31 Additional clearing, grubbing and site grading may be required for future development during operations, such as TMF lifts and MRMF expansion.
2	the open pit;	February 2021	July 2021	7 months	Substantially complete
3	the tailings and mine rock management facilities and associated water management systems;	February 2021	February 2024	3 years	Construction phase TMF Stage 1A complete. During operations phase: - TMF Stage 1B complete Summer 2024 - TMF Stage 2 will be complete Fall 2026 - TMF Stage 3 will be complete Winter 2028 - TMF Stage 4 will be complete Winter 2032 - MRMF Clearing/Grubbing Q1, 2024
4	the ore stockpile areas;	February 2021	May 2021	4 months	Complete
5	processing plant area, including the ore stockpile, conveyor and all associated infrastructure, including reagent storage area and truck shop;	February 2021	May 2021	4 months	Complete
6	the explosives storage area; and	February 2021	August 2022	18 months	Complete
7	worker accommodation area.	February 2021	May 2021	4 months	Complete

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Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration	Relevant Notes
#	Description				
8	Building the public bypass road would be built with aggregate and overburden sourced from on-site material, and with side ditches and culverts at creek crossings. The public bypass road would be built to the grade of a primary forest road in accordance with Ontario Ministry of Natural Resources and Forestry guidance and be subject to provincial approval under the <i>Provincial Lands Act</i> .	April 2021	TBD	TBD	Proposed bypass route was not approved by MNR. Alternative routing considerations ongoing but in the meantime Alamos is escorting public through the site as required.
9	Constructing of a drainage channel north of Water Body 10 to enhance flow and drainage. Construction of flood control berm at WB10.	April 2021	TBD	TBD	SLR Consulting completed test pitting to support work on design of a flood control berm at WB10. Originally the flood control berm was to be completed in 2023, but the mining schedule has delayed the requirement for the work until further notice. May require fish salvage activities.
10	Constructing of a channel to connect the outflow of Spring Lake to the lower reach of McVeigh Creek, south of the bypass road.	April 2021	May 2022	2 years	Constructed May 2022. Ongoing monitoring to determine potential modifications to support functionality.
11	Decommissioning historical mine components (buildings, non-mine waste landfill, existing tailings management facility).	February 2021	December 2026	5 years	Decommissioning Historical Tailings Facility is planned to facilitate open pit mining, planned for 2026. Waste Landfill excavated and relocated Q4 2023. Other infrastructure removed – June 2023.

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Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration	Relevant Notes
#	Description				
12	Draining waterbodies to be overprinted by the project footprint, including Lovell Lake, Webb Lake, part of McVeigh Creek and tributaries, waterbodies 1, 2, 3, 4, 5 and 10.	September 2021	TBD	TBD	Lovell Lake Treatment Pond and Waterbody 3 Treatment Pond to be overprinted in further stages of the project with TMF and MRMF development. Completion date has not been finalized. Drainage of Webb Lake complete in 2024. The portions of McVeigh Creek cutoff were dewatered as of summer 2023. Waterbodies 1 and 2 were dewatered in Summer 2023. Waterbodies 4 and 5 are now encapsulated inside of the TMF and are overprinted by tailings deposition. Waterbody 10 planned to partially become part of Goudreau Fish Habitat area; completion date has not been finalized.
13	LNG power plant	January 2022	June 2023	2 years	Commissioned in 2023.
14	Truck Shop	June 2025	June 2026	1 year	
15	Mill Expansion	January 2025	December 2027	3 years	Building infrastructure construction ongoing. Process trials conducted in 2025 to inform processing of Island Gold Mine’s higher grade ore.
Operation (15 years - November 2023 to December 2038)					
16	Extracting ore from the open pit.	January 2023	December 2038	16 years	Includes pre-stripping (during construction phase)
17	Drilling and blasting zones of rock.	April 2021	December 2038	18 years	Activity commenced during construction and continues in operations phase.
18	Removing the material and hauling it in trucks to the processing plant, stockpile areas and mine rock management facility.	January 2023	March 2039	15 years	Activity commenced during construction and continues in operations phase.
19	Dewatering the open pit.	May 2021	December 2038	17 years	Activity commenced during construction and continues in operations phase.
20	Stockpiling of overburden, low-grade ore, and waste rock.	April 2021	December 2038	17 years	Activity commenced during construction and continues in operations phase.

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Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration	Relevant Notes
#	Description				
21	Storing and using of explosives.	March 2021	December 2038	17 years	Activity commenced during construction and continues in operations phase.
22	Processing ore: Raw ore material extracted from the open pit or transferred from the ore stockpile will be processed through a crusher and a grinding circuit. A leaching and refining process would finely grind the ore and extract gold using cyanide and other reagents. Smelting to produce gold doré would then occur following the use of an electro- winning circuit.	May 2023	March 2039	16 years	Commercial production commenced November 1, 2023.
23	Water-taking from Goudreau Lake to supply potable and process water.	May 2023	March 2040	17 Years	No activity thus far
24	Managing mine water (effluent, runoff, and seepage) and sewage.	March 2021	March 2040	19 years	Surface water management plan is in effect. Provincial ECA for Industrial Sewage Works (2066-CQLN6X) during operations approved in May 2023.
25	Operating roads including mine haul and service roads, potable and process water infrastructure, sewage treatment system, on-site back-up power system, and accommodation facilities.	March 2021	March 2040	19 years	Activities developed from start of construction and continue in operations phase. Sewage treatment system was not installed and sewage transported off-site, however may consider implementing in 2026.
26	Rehabilitating the site progressively.	May 2023	December 2038	15 Years	Limited activity during the construction and early operations phase.
Decommissioning (i.e., Active Closure, 3 years January 2039 to December 2041)					
27	Removing project components that support ore extraction, processing, and transport.	February 2039	December 2041	3 years	
28	Draining of tailings water to the open pit.	January 2041	December 2083	43 years	
29	Removing of discharge and piping systems in the tailings management facility.	January 2039	December 2041	3 years	

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Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration	Relevant Notes
#	Description				
30	Grading of surfaces and placement of overburden and soil on portions of the tailings and mine rock management facilities, followed by selective seeding to initiate revegetation.	May 2039	October 2041	2 years	
31	Constructing wildlife access ramps on the tailings and mine rock management facilities.	May 2039	December 2041	2 years	
32	Revegetating the project footprint.	May 2039	October 2041	2 years	
Abandonment (50 years, including 7 years of Active Monitoring (in addition to Active Monitoring undertaken during Decommissioning) followed by Passive Abandonment January 2042 to December 2091)					
33	Monitoring of environmental conditions (e.g., water quality in Water Quality Control Pond, seepage collection ponds and open pit) to determine when direct release to the surrounding environment would be acceptable.	April 2023	December 2083	61 years	These are expected to occur throughout operations and pit flooding. WQCP and Open Pit monitoring began prior to release authorization.
34	Monitoring of success of site rehabilitation plan.	May 2036	December 2080 [for monitoring of pit filling]	45 years	Same – some monitoring of progressive reclamation through operations as well
35	Maintaining of the Water Quality Control Pond to receive drainage from the tailings and mine rock management facilities in perpetuity.	April 2023	N/A	N/A	To be maintained in perpetuity with operations and closure
36	Filling the open pit through natural runoff and groundwater flows. Natural filling would be supplemented with pumped water from Goudreau Lake at the same rate as freshwater taking during operations (1,680 cubic meters per day). This would take approximately 43 years.	January 2037	December 2079	43 years	
37	Connecting of the open pit lake with Goudreau Lake, upon demonstration that open pit lake water quality monitoring is suitable for discharge.	June 2080	June 2081	1 year	