Initial Project Description Plain Language Summary

Lawyers-Ranch Project

December 17, 2025

THESIS GOLD
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Revision Record

Revision	Date	Revision Description
0	November 3. 2025	Issued for regulatory review
1	December 9, 2025	Re-issued regulatory submission to address British Columbia's Environmental Assessment Office and the Impact Assessment Agency of Canada's comments.
2	December 17, 2025	Re-issued for updates

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Statement of Limitations

This document has been prepared by One-Eighty Consulting Group Inc. (One-Eighty) and reviewed and finalized by Chu Cho Environmental LLP (CCE) and SLR Consulting (Canada) Ltd. (SLR) as the Environmental Assessment (EA) Technical Team, in accordance with the scope of work and all other terms and conditions of the agreement between such parties. The EA Technical Team acknowledges and agrees that its client, Thesis Gold Inc. (Thesis), may provide this report to government agencies, interest holders, and/or Indigenous Nations as part of project planning or regulatory approval processes. Copying or distribution of this report, in whole or in part, for any other purpose other than as aforementioned is not permitted without the prior written consent of the EA Technical Team and Thesis.

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List of Acronyms & Abbreviations

Acronym/Abbreviation	Definition
AIR	Application Information Requirements
BC	British Columbia
DFO	Fisheries and Oceans Canada
CNR	Canadian National Railway
EA	Environmental Assessment
EAO	Environmental Assessment Office
ECCC	Environment and Climate Change Canada
ENV	Ministry of Environment and Parks
EP	Engagement Plan
FS	Feasibility Study
FSR	Forest Service Road
GHG	greenhouse gas
IAAC	Impact Assessment Agency of Canada
IPD	Initial Project Description
LRMP	Land and Resource Management Plan
MCM	Ministry of Mining and Critical Minerals
OP	open pit
OPP	ore processing plant
PEA	Preliminary Economic Assessment
PFS	Pre-Feasibility Study
Project	gold-silver mining project in the Toodoggone mining region of British Columbia, named the Lawyers-Ranch Project
Reserve	Indian Reserve, as defined by the *Indian Act*
TCG	Tahltan Central Government
TMF	Tailings Management Facility
TSF	Tailings Storage Facility
Thesis	Thesis Gold Inc.
VC	Valued Component
WLRS	Ministry of Water, Land and Resource Stewardship
WRSF	waste rock storage facility

Symbols and Units of Measurement

Symbol/Unit of Measurement	Definition
$	symbol denotes Canadian dollars
%	percent
+	plus
°C	degrees Celsius
ha	hectare
km	kilometre
$ktCO_2e$	kilotonnes of carbon dioxide equivalent
m	metre
masl	metres above sea level
Mtpa	million tonnes per annum
tpd	tonnes per day

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1.0 Introduction

This document is the plain language summary of the Initial Project Description (IPD) for Thesis Gold Inc.'s (Thesis) proposed gold-silver mining project in the Toodoggone mining region of British Columbia, named the Lawyers-Ranch Project (the Project). The Project is approximately 450 kilometres (km) north-northwest of the City of Prince George and 275 km north of the Town of Smithers and is situated on Crown land in British Columbia (BC) (Figure 1-1). The Project partially overlaps with the traditional territories of Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation.

The Project area was previously altered from its original state, or previously "disturbed", by the Cheni Mine, which is no longer operating. Existing infrastructure from the former Cheni Mine includes roads and trails, underground mining areas, and the nearby Sturdee Airstrip. Thesis intends to leverage existing infrastructure from the former Cheni Mine to reduce the amount of new disturbance created by the Project.

The Project has mineral deposits that are best accessed through both underground and open pit (OP) mining methods. The Project has an anticipated production rate of approximately 5.1 million tonnes per annum (Mtpa) on average. The ore processing plant (OPP) will produce doré and concentrate. Doré is an unrefined, dense brick of gold, whereas concentrate is typically in powdered form and shipped in large totes. Ore will be processed at an annual average rate of 5.1 Mtpa, or an annual average of 13,700 tonnes per day (tpd). The maximum annual throughput is estimated to be approximately 5.5 Mtpa. With the implementation of design features, the OPP would have the maximum capacity of 15,000 tpd of processed ore.

The Project is required to undergo the Environmental Assessment (EA) processes set out by the BC Environmental Assessment Office (EAO) pursuant to the "*Environmental Assessment Act*" and the Government of Canada's Impact Assessment Agency of Canada (IAAC) pursuant to the *"Impact Assessment Act*". The *Impact Assessment Cooperation Agreement between Canada and British Columbia (Government of Canada 2020)* can enable a "substituted" regulatory process for projects that the Minister of Environment and Climate Change approves. In such cases, both agencies rely on the assessment administered by one government (although both retain separate decision-making authority at the end of the assessment). It is expected that the EAO and IAAC will coordinate the initial phases of their respective processes and the EAO will request that the Project proceed through a substituted process led by the EAO.

Thesis is creating strong, collaborative relationships with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation for the region and Project through agreements, project co-design, and equity investments; positioning the Project to proceed with shared oversight and mutual benefit. The IPD and Engagement Plan (EP) for the Project have been shared with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation for review and feedback. Feedback received has been summarized within the IPD and is consistent with the themes presented in Section 6.0, Indigenous Nations Interests and Engagement, of this plain language summary.

The purpose of this plain language summary is to provide an initial high-level overview of the current information available on the Project to inform the public and other participants. The Project is subject to further development, refinement, and amendment. As the Project is refined, and additional technical details and supporting materials become available, such information and content will be integrated into future Project submissions to the EAO and IACC, such as the Detailed Project Description and Environmental Assessment Certificate (EAC) Application. Feedback from Indigenous Nations, which was provided in comments on a draft version of the IPD, is reflected in this plain language summary.

Legend

- Lawyers-Ranch Project
- Sturdee Airstrip
- Kemess Mine
- Town and Community
- Emergency Services
- Existing Transmission Line
- Highway
- Forest Service Road
- Potential Transmission Line Extension Corridor
- NTS Mapsheet Grid

North American Datum 1983
NAD 1983 BC Environment Albers

Map Center Coordinates: -124.9119° 55.94954°
Project Coordinates: -127.282014° 57.402529°
Project NTS Map: 94E
Scale: 1:2,500,000

Notes:
1. Basemap Data: GeoBC Data Distribution
2. Basemap: ESRI Topographic
3. Data supplied by Thesis Gold on 2025-01-16
4. Prepared by Chu Cho Environmental

0 50 100
Kilometres

Figure 1-1
Rev. 2

December 17, 2025

THESIS GOLD

Project Location

Lawyers-Ranch Project
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2.0 Proponent Information

Thesis is a Canadian mineral resource development and exploration company based in Vancouver, BC, and is the owner and operator of the Project. Contact information for Thesis is provided below in Table 2-1.

Table 2-1: Primary Contact Information for Thesis Gold Inc.

Contact Information	
Head Office	Thesis Gold Inc. 1075 West Georgia Street, Suite 1050 Vancouver, BC, Canada V6E 3C9
E-mail	community@thesisgold.com
Website	https://thesisgold.com/
Phone Number	(416) 662-9978
Thesis Representative	Stephen Crozier Thesis Gold Inc. Executive VP, External Affairs & Sustainability
Principal Contact for the Environmental Assessment	Carmen Holschuh One-Eighty Consulting Group community@thesisgold.com

2.1 The Thesis Approach

Thesis seeks to do more than meet the minimum regulatory requirements for the Project. To enable this, a set of working priorities guides Project development, including:

- Enable early and ongoing participation from Indigenous Nations in environmental field programs and monitoring, employment and contracting, Project planning and design, and equity ownership.
- Integrate Indigenous Knowledge and science systems to inform planning, design, and decision-making throughout Project development.
- Where feasible, minimize new impacts to land by using existing disturbance and infrastructure, and carry out progressive reclamation to restore land as the Project advances.

2.1.1 Indigenous Collaboration in Project Design

Thesis has worked closely with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation since 2019 to help shape the Project from its earliest stages. This collaboration has influenced exploration activities, mine design, environmental studies, and the development of monitoring and mitigation programs. Indigenous Nation-owned and affiliated businesses have led studies on wildlife, water, and other environmental conditions, and helped identify areas that should be protected. Their input continues to guide Project planning and design.

Key examples of Indigenous Nation collaboration to date include:

- **Equity Ownership:** Thesis has worked with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation to offer opportunities for direct financial equity in the Project. Initial equity agreements are already in place with these Indigenous Nations. Thesis has made, and will continue to make, efforts to explore similar opportunities with Tahltan Nation. This evolving ownership structure reflects a broader vision and shared oversight that extends into shared opportunity.
- **Collaborative Project Design**: Thesis has collaborated with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation from the early stages of planning to help shape the Project's design. Representatives from these Nations took part in a 2021 Tailings Storage Facility (TSF) alternatives assessment and the 2025 Co-Design Workshops. Thesis will continue to include Indigenous perspectives in Project planning and look for new opportunities to collaborate.
- **Capacity Building**: Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation's involvement have been prioritized through annual capacity funding, training, and onsite contracting and employment opportunities, resulting in over $50 million (Canadian dollars) in contracts to Indigenous-owned or affiliated businesses to date
- **Reclamation and Restoration**: The Project is located on the site of the former Cheni Mine. Approximately 90 percent (%) of land disturbed by the company's exploration activities has been reclaimed since Thesis began exploration work at the Project site. This work has been informed by Indigenous Nation feedback and overseen by a team of reclamation supervisors.
- **Wildlife Protection**: A Caribou Mitigation Strategy and broader Wildlife Monitoring and Management Plan were developed for exploration activities in collaboration with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation to track and respond to the presence of caribou and other wildlife in the Project area. An extensive wildlife camera network is included in this work and will inform the assessment of potential Project effects.
- **Environmental Management**: Indigenous Nation-owned and affiliated businesses have designed and carried out studies to characterize existing environmental conditions for the Project and monitor effects of ongoing work.

Indigenous Nations have also helped shape reclamation goals, including a native seed and stem collection workshop that sourced seeds and stems from locally sourced plants. Archaeological studies are being carried out with Indigenous participation to protect cultural and heritage sites.

Thesis has provided training, funding, and work opportunities to support Indigenous involvement, resulting in over $50 million in contracts to Indigenous-owned businesses. The company has also offered equity opportunities to Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation, and is exploring similar opportunities with Tahltan Nation.

Changes to the Project based on Indigenous feedback include reducing the overall footprint by combining two potential mine sites into a single project, relocating infrastructure to avoid sensitive areas, and developing strategies to protect wildlife like caribou. Indigenous Nations were also invited to review drafts of the Initial IPD and EP, and their feedback has been incorporated. This collaborative approach reflects Thesis' commitment to shared leadership, environmental stewardship, and long-term benefits for communities connected to the land.

3.0 Project Overview

This section outlines key information about the Project, including its purpose and benefits, geographic context, development history, anticipated schedule, existing permits and approvals, and information about the upcoming EA and permitting processes.

3.1 Purpose, Rationale, and Benefits of the Project

The purpose of the Project is to produce gold-silver doré and concentrate (forms of processed gold and silver ore) to support increasing economic and industrial demands while providing mutual benefits to Indigenous Nations and to support economic growth at both the provincial and national levels. The unique properties of gold and silver make them essential to the development of many new technologies, with applications in the medical, electronics, renewable energy, and aerospace industries. Gold and silver also carry a high intrinsic value, often being used to hedge against inflation and times of economic uncertainty.

Many rural communities in the region have historically relied on the forest industry for jobs and economic stability; however, the forest industry is now in decline.
The Project is expected to help offset the effects of this decline. The Project can help diversify local economies, support local businesses, and increase employment and community opportunities.

The Project is anticipated to create direct and indirect employment in exploration, mining, processing, and support services, benefiting both urban and rural regions of BC. These programs include opportunities and preferential selection programs for local suppliers and businesses. These preferential selection programs for local suppliers and businesses will be developed in consultation with both Indigenous and non-Indigenous local suppliers. It is currently estimated that the Project will require more than 500 onsite personnel when operating at peak capacity. Workers will be housed on-site in an accommodations complex that will be able to house approximately 500+ workers. The primary workforce is anticipated to come from communities throughout western Canada.

Thesis has and will continue to prioritize training and skill exposure across all disciplines to encourage more people into the workforce and employment and contracting opportunities to qualified members and businesses of local Indigenous Nations throughout the Project phases.

3.2 Project Location

The Project is located in north-central BC, approximately 480 km northwest of the City of Prince George and 275 km north of the Town of Smithers (Figure 1-1).
The Project is situated on Crown land in BC administered by the Province of British Columbia and consists of 100 contiguous (i.e., sharing a boundary) mining claims (41,268 hectares [ha]). Thesis owns 100% of the mineral claims either directly or indirectly through its wholly owned subsidiary, Thesis Gold (Holdings) Inc.

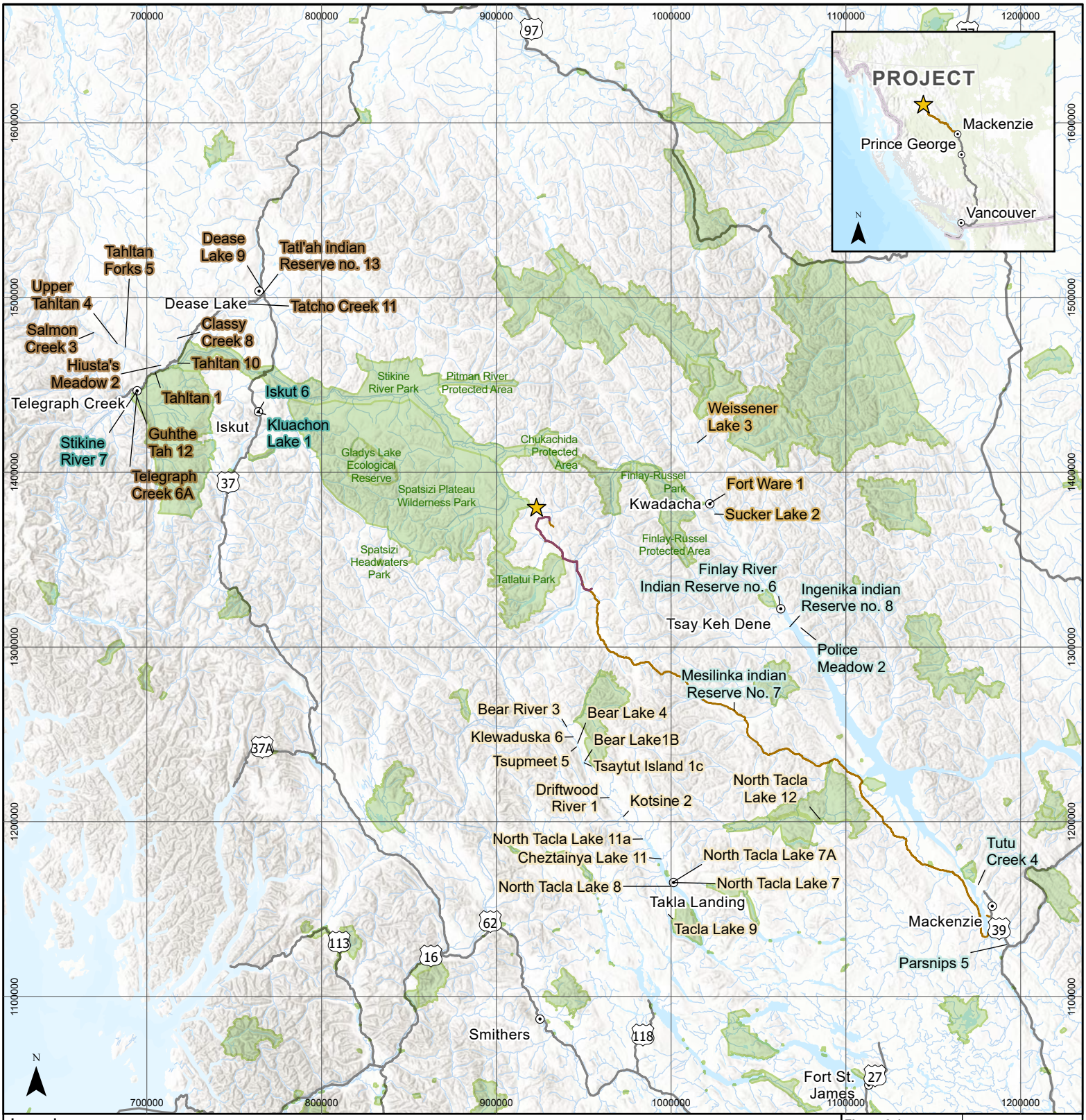
The nearest Indian Reserves, as defined by the federal *Indian Act* (Reserve) are Fort Ware 1 and Weissener Lake 3, belonging to Kwadacha Nation. They are both approximately 100 km away from the Project. The Project does not overlap with any provincial parks. The nearest park is the Spatsizi Plateau Wilderness Provincial Park, which is approximately 1.5 km west of the Project.

The communities and areas of interest nearest the Project are summarized in Table 3-1 and are illustrated on Figure 3-1. The distances from the Project to Reserves are summarized in Table 3-2.

Table 3-1: Local Communities and Areas of Interest

Category	Local Communities	Approximate Distance from Project (km)		Direction from Project
		By Road[1]	Straight Line	
Kwadacha Nation	Kwadacha (Fort Ware)	534	99	East
Tsay Keh Dene Nation	Tsay Keh Dene	648	150	Southeast
Takla Nation	Takla Landing	461	228	South
Tahltan Nation	Dease Lake	1,561	201	Northwest
	Iskut	1,449	168	West
	Telegraph Creek	1,367	238	West
Local Municipalities	Mackenzie	464	347	Southeast
	Prince George	625	481	Southeast
	Smithers	850	292	South

*Approximate distances were measured in a straight line to the edge of the Project footprint outline.
[1] GeoBC (2017).



Legend

- Lawyers-Ranch Project
- Town and Community
- Highway
- Forest Service Road
- Potential Transmission Line Extension Corridor
- BC Parks

Indian Reserve by Indigenous Group

- Kwadacha Nation
- Tsay Keh Dene Nation
- Takla Nation
- Iskut Nation
- Tahltan Nation

North American Datum 1983
NAD 1983 BC Environment Albers

Map Center Coordinates: -127.21314° 57.13626°
Project Coordinates: -127.282014° 57.402529°
Project NTS Map: 94E
Scale: 1:3,000,000

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4. Prepared by Chu Cho Environmental

0 60 120
Kilometres

Figure 3-1
Rev. 2

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Local Communities and Areas of Interest

Lawyers-Ranch Project
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Table 3-2: Approximate Distance to Indian Reserves

Indigenous Group	Indian Reserve Name	Approximate Distance from Project (km)	
		By Road[1]	Straight Line
Kwadacha Nation	Fort Ware 1	534	99
	Sucker Lake 2	526	102
	Weissener Lake 3	588*	99
Tsay Keh Dene Nation	Finlay River 6	461	150
	Ingenika 8	461	160
	Mesilinka 7	207	162
	Parsnip 5	468*	368
	Police Meadow 2	494	167
	Tutu Creek 4	481	333
Takla Nation	Bear Lake (Fort Connolly) 4	752*	137
	Bear Lake (Tsaytut Bay) 1B	739*	148
	Bear Lake (Upper Driftwood River) 3	763*	127
	Cheztainya Lake 11	663	213
	Driftwood River (Kastberg Creek) 1	711*	171
	Klewaduska (Cataract) 6	754*	133
	Kotsine (Skutsil) 2	697*	184
	North Tacla Lake (North End Meadow) No. 11A	692	199
	North Tacla Lake (West Landing) 8	671*	230
	North Tacla Lake 12	329*	242
	North Tacla Lake 7	647	229
	North Tacla Lake 7A	648	228
	Tacla Lake (Ferry Landing) 9	667	245
	Tsaytut Island 1C	741*	149
	Tsupmeet (Patcha Creek) 5	751*	139
Iskut Nation	Iskut 6	1,367	169
	Kluachon Lake 1	1,368	169
	Stikine River 7	1,563	239

Indigenous Group	Indian Reserve Name	Approximate Distance from Project (km)	
		By Road[1]	Straight Line
Tahltan Nation	Classy Creek 8	1,514*	227
	Dease Lake 9	1,454	202
	Guhthe Tah 12	1,562	239
	Hiusta's Meadow 2	1,543	230
	Salmon Creek 3	1,602*	273
	Tahltan 1	1,542	231
	Tahltan 10	1,522	222
	Tahltan Forks 5	1,586*	253
	Tatcho Creek 11	1,462	203
	Tatl'ah Indian Reserve No. 13	1,452	199
	Telegraph Creek 6A	1,561	238
	Upper Tahltan 4	1,590*	258

Notes:

1. Distances marked by an asterisk (*) indicate that a Reserve is not fully accessible by road. These distances are approximate and may include a combination of road, rail, and straight-line measurements.
2. Takla Nation, as part of its review of the IPD, shared that it is in ongoing settlement discussions with Canada that may result in the attribution of additional Reserves to Takla Nation.

[1] GeoBC (2017)

3.2.1 Land and Resource Management Areas

The Project does not fall within a municipality. The Project is within the Mackenzie Land and Resource Management Plan (LRMP) (BC Gov 2000b) area and the Cassiar-Iskut-Stikine LRMP (BC Gov 2000a). LRMPs provide strategic-level direction for managing Crown land resources and also identify ways to achieve community, economic, environmental, and social objectives.

3.3 Project History

The Project consists of two mineral exploration sites; the Lawyers and Ranch sites, both of which have a long history of mineral exploration. Gold and base metals were documented in the region as early as 1824, and early exploration efforts were first recorded in the 1960s. Exploration efforts on site confirmed the presence of economic mineral resources in the 1980s, leading to the development of the Cheni Mine, which was operated by Cheni Gold Mines Inc., but is no longer operating.

The Cheni Mine included underground mining for high-grade gold and silver at the Lawyers Site, which operated between 1989 and 1992, and surface mining at the Ranch Site in 1991. Extensive exploratory drilling took place at the Ranch Site between 1982 and 2007, across 14 gold-mineralized zones.

Tailings (i.e., the material left over after the valuable minerals [gold and silver] have been removed from the mined material) from the former Cheni Mine were stored at a Tailings Management Facility (TMF) located on the west bank of Attorney Creek. A TMF consists of a dam and a pipeline to transport tailings from the processing plant to the TSF. The historic TMF is approximately 700 metres (m) long and 330 m wide and covers an area of approximately 13 ha (Golder 2020). The Cheni Mine TMF was reclaimed (i.e., returned to as close to original state as possible) in 1996 by placing a till cover over the tailings, and regrading the crest and downstream face of the dam. Repair and upgrade of the spillway was conducted in 2019 (Golder 2020).

3.4 Project Timing

Project planning and design will require refining and optimization throughout the process, with multiple opportunities for feedback from Indigenous Nations, the public, and government.

The current anticipated timing for the EA process is outlined in Table 3-3. This schedule follows the BC EA process and assumes a substituted federal review process (see Section 5.0 for more details). The high-level schedule presented in Table 3-3 is subject to change based on conversations and feedback from the EAO, IAAC, Indigenous Nations, the public, and other stakeholders.

Table 3-3: Preliminary EA Phases Timing

EA Phases	Preliminary Timing
Early Engagement	Q4 2025-Q1 2026
Readiness Decision	Q1 2026-Q2 2026
Process Planning	Q2 2026-Q3 2026
Application Development and Review	Q3 2026-Q2 2028
Effects Assessment and Recommendation	Q3 2028-Q1 2029
Decision	Q1 2029
Post-Certificate	Q1 2029, onwards

The estimated durations of each anticipated Project phase are highlighted in Table 3-4 and will be further described and refined in the EA. Timing of initiation is subject to further engagement and dependent on the duration of the EA process and the attainment of anticipated permits, licences, and approvals.

Table 3-4: Project Phases, Estimated Durations, and Preliminary Timing

Project Phases	Estimated Duration	Preliminary Timing
Construction – Early Works	Approximately 2 years	2029-2031
Construction – Development		
Operation	Approximately 14 to 20 years	2031 onward
Closure	Approximately 1 year after completion of mining activities	To be determined
Post-Closure	Post-Closure will begin after Closure and will take place until permit requirements are met	To be determined

3.5 Existing Permits, Licenses, and Approvals

The Project will overlap with the historic Cheni Mine workings (i.e., the areas where minerals have been extracted) and waste rock storage facility (WRSF) but will not overlap or disturb the historic TMF. The care and maintenance of the historic WRSF and TMF at the Project site are the responsibility of the Ministry of Mining and Critical Minerals (MCM), which was formerly the Ministry of Energy, Mines and Low Carbon Innovation.

Thesis currently holds two Exploration Permits under the BC *Mines Act* (for exploration activities) and two water licences (for water withdrawal) under the *Water Sustainability Act* at the Lawyers and Ranch sites.

These permits are currently active but may expire at some point during the EA and permitting processes. Amendments and new permits will be obtained, as required, prior to any work being conducted.

Existing permits, licenses, and approvals that are relevant to the Project are summarized in Table 3-5.

Table 3-5: Existing Permits, Licenses, and Approvals

Act	Permit/Approval Type	Name/Permit or License Number	Notes
Mines Act	Exploration Permit	MX-13-100	Exploration activities at the Lawyers Site are permitted under Mineral Exploration Permit MX-13-100, which was initially issued to Guardsmen Resources Inc. in 2003, transferred to Phoenix Precious Metals in 2011, and transferred to Benchmark Metals Inc. (now Thesis) in 2018.
Mines Act	Exploration Permit	MX-100000113	Exploration activities at the Ranch Site are permitted under Mineral Exploration Permit MX-100000113, which was issued to Thesis in 2021.
Water Sustainability Act	Water License	Conditional Water License 506026	Active water license held for the Lawyers Site under the *Water Sustainability Act*.
Water Sustainability Act	Water License	Conditional Water License 506288	Active water license held for the Ranch Site under the *Water Sustainability Act*.
Park Act	Park Use Permit	111727	Authorization to conduct aquatic studies within the Spatsizi Plateau Wilderness Provincial Park.
Forest Act	Occupant License to Cut	L52070	Authorization to cut and remove Crown timber as required to facilitate operations within the license area.
Forest Act	Special Use Permit	SP0007	Authorization to use a portion of Crown land for the purposes of construction and maintenance of a road.
Heritage Conservation Act	Heritage Inspection Permit	2024-0197	Authorization to conduct an Archaeological Impact Assessment. If an archaeological or heritage site is found and cannot be avoided, Thesis would obtain a Site Alteration Permit under the *Heritage Conservation Act*.

Source: JDS (2024).

4.0 Project Description

This section provides a summary of the proposed Project, including the proposed Project components and activities.

4.1 Project Design and Planning

Project planning and design is an iterative process that is informed by technical design considerations and ongoing engagement with Indigenous Nations – enabling Thesis to integrate Indigenous perspectives and environmental, social, and economic factors into Project development. The design process includes key milestone documents that evaluate the Project's practicality. These include the Preliminary Economic Assessment (PEA), which gives an early overview of the Project's potential; the Pre-Feasibility Study (PFS), which assesses whether the Project is likely to succeed; and the Feasibility Study (FS), which involves detailed planning and supports major investment decisions.

The Project is near the end of the PFS stage, with FS-level work planned to take place beginning in 2026. The design will continue to be refined through the FS, additional technical studies, existing conditions studies, and the EA. The Project will meet Technology Readiness Level 7 requirements for the Application for an Environmental Assessment Certificate.

The first PEA was completed in 2022 and was informed by Indigenous collaboration and data available at the time of writing. In 2023, Thesis combined the Lawyers and Ranch projects into one Project, and an updated PEA was completed in 2024. This updated version included design changes to reduce environmental impacts by consolidating the Project footprint and adjusting the location of mine components.

The 2024 PEA also incorporated new information from site exploration, environmental studies, and mine planning. This document is available on the Project website. Thesis recently released the results of a PFS, with the technical report expected for completion in early 2026. The PFS, contains minor design changes that reflect an advanced understanding of project conditions based on engineering investigations and environmental studies. The Project design will also be informed by new baseline data and feedback gathered through the EA process.

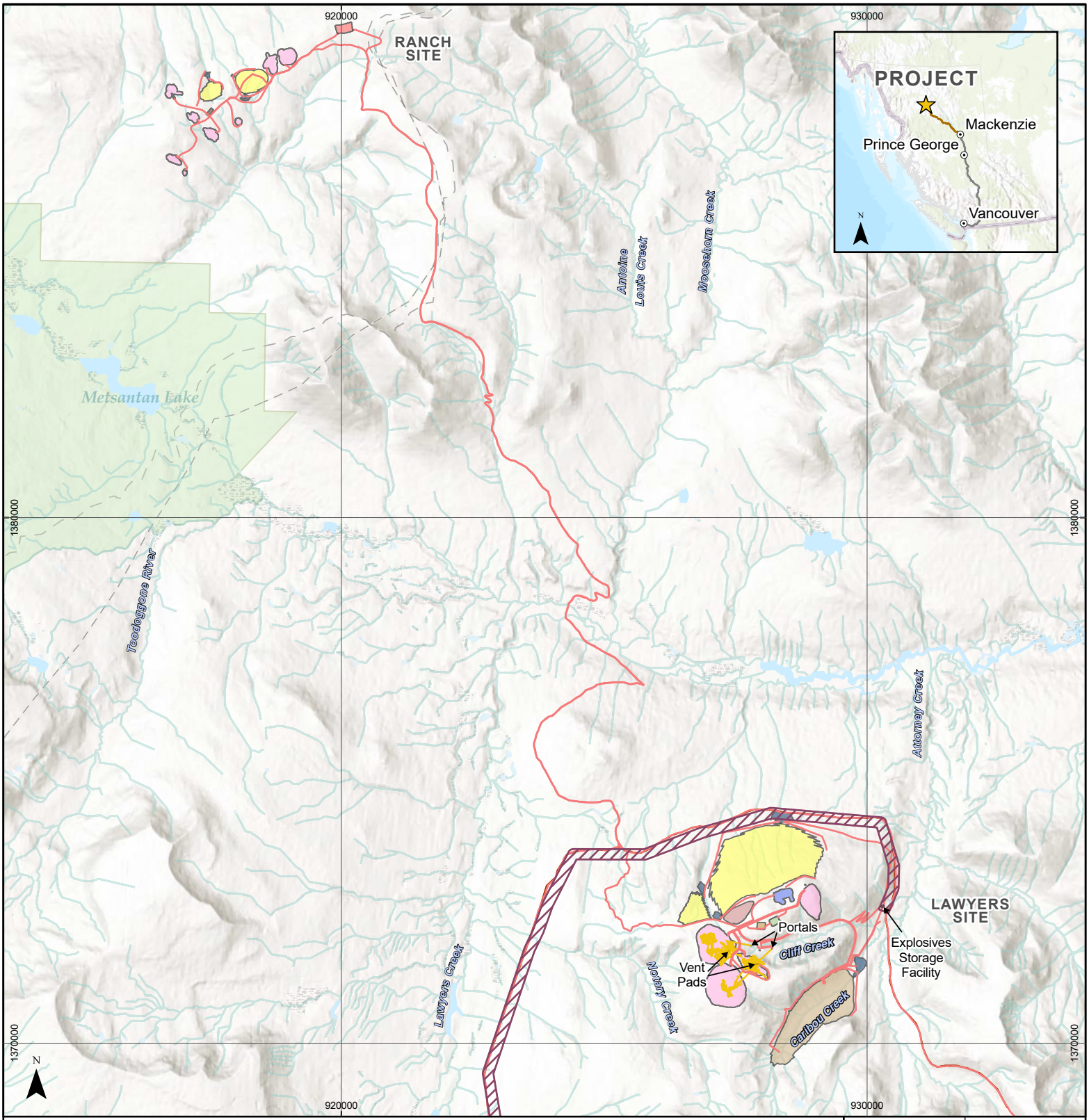
4.2 Proposed Project Components

The proposed Project components include underground and OP mining facilities and infrastructure, including vent pads and open pit areas, an ore processing plant (OPP), a TMF, four WRSFs, a high-grade stockpile, an accommodations complex, a transmission line extension connecting the Project to the existing Kemess Mine transmission line, waste management facilities, and facilities that support operation and maintenance of Project activities (ancillary facilities). The Project components are summarized in Table 4-1. An overview of the Lawyers and Ranch sites, including the access roads is provided in Figure 4-1, and an overview of the potential transmission line extension corridor is provided in Figure 4-2. The preliminary Project layout for the Lawyers and Ranch sites are shown in Figure 4-3 and Figure 4-4, respectively.

Table 4-1: Proposed Project Components

Proposed Project Components	Lawyers	Ranch	Details/Description
Underground Mining Area and Infrastructure	New	Not applicable	Will be in place where targeted underground mining will occur to extract high-grade ore. Underground Infrastructure: • Portals provide access to underground workings. • Transfer pads will be used to transfer material from underground trucks to haul trucks. • Underground workings: includes tunnels, excavations, shafts, and declines.
Vent Pads	New	Not applicable	Vent pads are where underground vent raises interface with the surface. Vent pads will be in place at surface, for ventilation of the underground mining areas.
Lawyers Site OP Area	New	Not applicable	Will be in place where targeted OP mining will occur at the Lawyers Site to extract ore.
Ranch Site OP Area	Not applicable	Existing/modified	Will be in place where targeted OP mining will occur at the Ranch Site to extract ore. Areas that were previously excavated from historical mining activities may be revisited.
Ore Processing Plant (OPP)	New	Not applicable	The OPP consists of the mill and supporting facilities. Mined material will be transported to the OPP, where it will be processed and refined, producing doré and concentrate.
Waste Rock Storage Facility (WRSF)	New	New	Waste rock will be stored near the OP areas at both the Lawyers and Ranch sites in two new WRSFs at each site.
Tailings Management Facility (TMF)	New	Not applicable	Tailings are a byproduct of mineral processing. The TMF consists of a tailings storage facility (TSF) (including a dam) and pipelines; one pipeline to transport tailings from the processing plant to the TSF, and one water reclaim pipeline that will be used to recycle water for processing.
Power Supply	Existing/modified and new	Existing/modified and new	The main source of power for the Lawyers Site is anticipated to be provided via a new transmission line extension, which would be connected to the existing transmission line that currently provides power to the Kemess Mine. A new substation will be constructed. The Lawyers Site is planned to be powered by hydro-electric power and will use diesel generators for emergency backup power. The Lawyers Site may be powered by diesel generators as primary power source, should the hydro line not prove feasible. The Ranch Site will be powered by diesel generators. The proposed transmission line extension corridor will connect from the existing transmission line that currently provides power to the Kemess Mine. The transmission line route is expected to be inside a corridor that generally follows an existing road. Detailed route refinements are expected to be within the corridor, and will consider location of environmentally sensitive features, input from Indigenous Nations and relevant regulatory authorities, as well as technical requirements for transmission line infrastructure. It is expected that the transmission line route is approximately 70 km in length will require an approximate 40 m wide right-of-way.
Accommodations Complex	New	Not applicable	The accommodations complex is anticipated to house approximately 500+ workers, and will include the following facilities: • Kitchen and food storage; • Dining room; • Arrivals/departures buildings, including reception and first aid; • Recreation facilities and gymnasium; • Utility rooms (mechanical, electrical, domestic potable/hot water, fire protection); • Laundry; • IT/server room; and • Potable water treatment plant.

Proposed Project Components	Lawyers	Ranch	Details/Description
Site Access and Onsite Roads	Existing/modified and new	Existing/modified and new	The Project will use the existing road infrastructure and Sturdee Airstrip for access. Several other exploration companies in the area are currently using this airstrip. The Project is accessible by following a network of existing Forest Service Roads (FSR) that begin south of the Municipality of Mackenzie, BC, just off Highway 97, including: • Finlay FSR • Finlay-Osilinka FSR • Tenakihi FSR (Thutade FSR) • Omineca Resource Access Road (ORAR) or “Kemess Road” Vehicle access to the Project, including both the Lawyers and Ranch sites, will be routed through the existing Ring Road (which is part of the gravel Cheni Road). The Lawyers and Ranch sites are connected by the 28 kilometre (km) Ranch Road. Existing roads on site will be utilized as much as possible, and additional roads will be required to be built to access certain areas. Road work is expected to involve: • Upgrades to approximately 29 km of existing roads; and • Construction of approximately 15 km of new haul roads.
Water Supply for Mining and Processing Activities	New	New	Precipitation and runoff from active areas will supply water for mining and ore processing through the construction of collection and diversion channels. Groundwater wells will be installed at both the Lawyers and Ranch sites to supply additional water. Water used for processing will be recycled, where possible.
Water Management Pond	New	New	The water management ponds will hold water, prior to recycling, release or treatment.
Water Treatment Plant	Not applicable	New	The water treatment plant will treat contact water, prior to release.
Onsite waste and recycling management facilities	New	Not applicable	Waste and recycling storage/transfer facilities will be used for temporary waste and recycling storage before they are transferred offsite. Some domestic (i.e., not mine materials) and organic waste will be incinerated onsite. Hazardous waste will be transported offsite to an approved facility. Inert waste, which is waste that is neither chemically nor biologically reactive and will not decompose or only do so very slowly, including equipment drained of all oils and hazardous materials, will go to a landfill onsite.
Bulk Fuel Storage and Distribution	New	Not applicable	There will be several diesel double-wall-storage tanks and a dispensing station for the mine mobile equipment fleet located near the mine maintenance facility. The facility will be complete with the requisite spill storage capacity and will meet the fuel storage requirements.
Explosives Storage Facility	New	Not applicable	Explosives that will be used to facilitate mining activities will be managed and stored onsite according to applicable regulatory requirements and best practices.
Ancillary facilities	New	Not applicable	Ancillary facilities include: • Gateway house. • Offices and mine dry facility. • Maintenance facilities and laydown areas. • Assay (i.e., testing of a metal or ore to determine its ingredients and quality) laboratory. • Warehousing facilities for the mine and mill. • Emergency response and training facility. • IT and communications infrastructure. • Firewater (i.e., water used to fight fires) distribution and fire detection systems. • Paste Plant (produces cement mixture used to backfill underground workings). • Temporary concrete batch plant for construction purposes.
High Grade Stockpile	New	Not applicable	A stockpile to temporarily store high-grade ore prior to processing.
Ore Stockpile Pad	Not applicable	New	A lined pad placed at Ranch needed for the temporary placement of ore prior to processing.



Legend

- Access Road
- Existing Transmission Line
- Forest Service Road
- Underground Mining Area
- Open Pit Areas
- Ore Processing Plant
- Waste Rock Storage Facility
- Tailings Management Facility
- Potential Transmission Line Extension Corridor
- Accomodations Complex
- Water Management Pond
- Water Treatment Plant
- Ore Stockpile Pad
- Ancillary Facilities
- High Grade Stockpile

North American Datum 1983
NAD 1983 BC Environment Albers

Map Center Coordinates: -127.26808° 57.39513°
Project Coordinates: -127.282014° 57.402529°
Project NTS Map: 94E
Scale: 1:100,000

Source Notes:
1. Basemap Data: GeoBC Data Distribution
2. Basemap: ESRI Topographic
3. Data supplied by Thesis Gold on 2025-01-16
4. Prepared by Chu Cho Environmental

0 2 4
Kilometres

Figure 4-1
Rev. 2

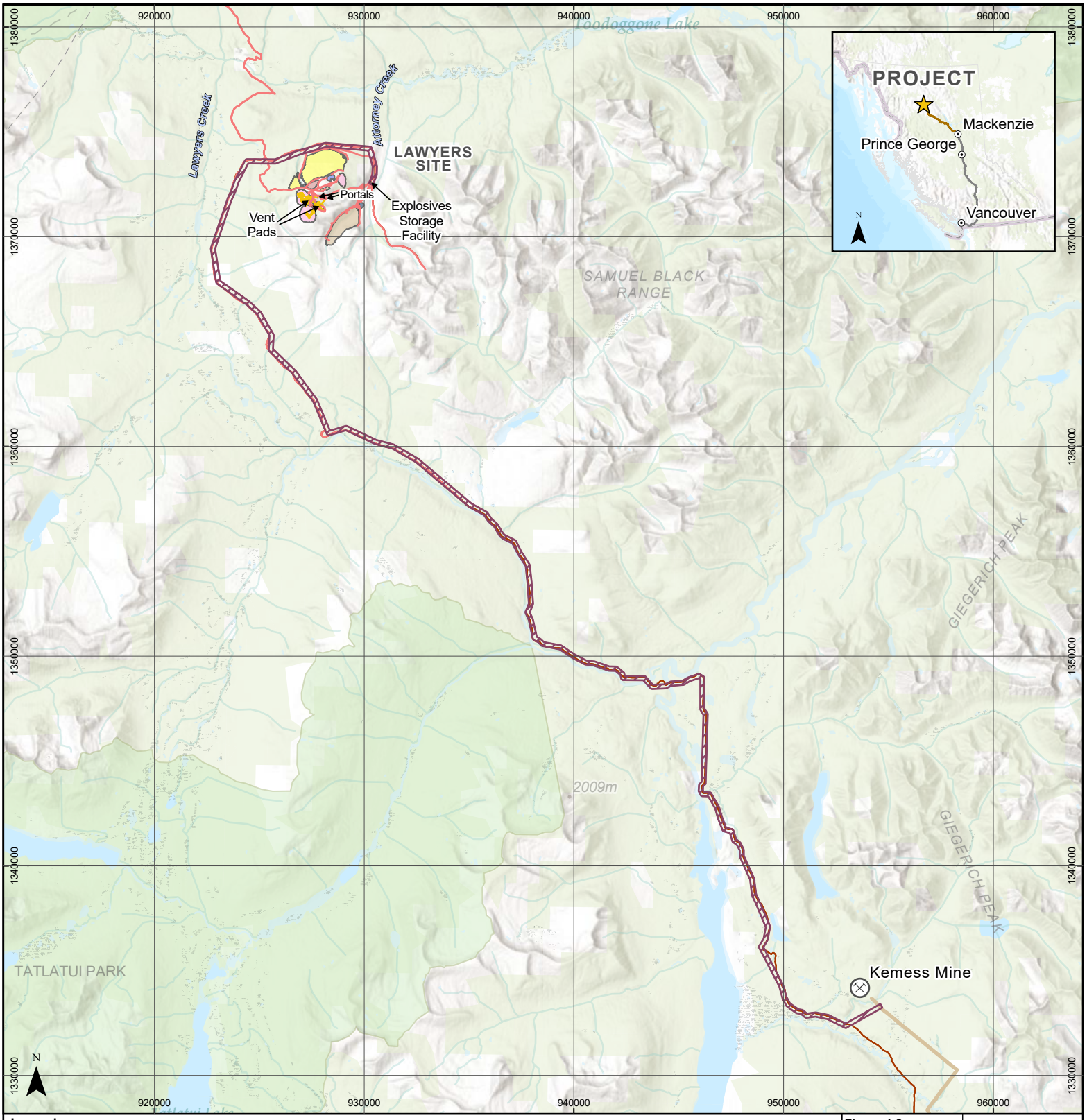
December 17, 2025

THESIS GOLD

Project Overview: Lawyers and Ranch Sites

Lawyers-Ranch Project
Plain Language Summary

CHU CHO ENVIRONMENTAL one-eighty SLR



Legend

- Kemess Mine
- Access Road
- Existing Transmission Line
- Forest Service Road
- Underground Mining Area
- Open Pit Areas
- Ore Processing Plant
- Waste Rock Storage Facility
- Tailings Management Facility
- Potential Transmission Line Extension Corridor
- Accomodations Complex
- Water Management Pond
- Ancillary Facilities
- High Grade Stockpile

North American Datum 1983
NAD 1983 BC Environment Albers

Map Center Coordinates: -127.01792° 57.17706°
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Project NTS Map: 94E
Scale: 1:250,000

Source Notes:
1. Basemap Data: GeoBC Data Distribution
2. Basemap: ESRI Topographic
3. Data supplied by Thesis Gold on 2025-01-16
4. Prepared by Chu Cho Environmental

0 5 10
Kilometres

Figure 4-2
Rev. 2

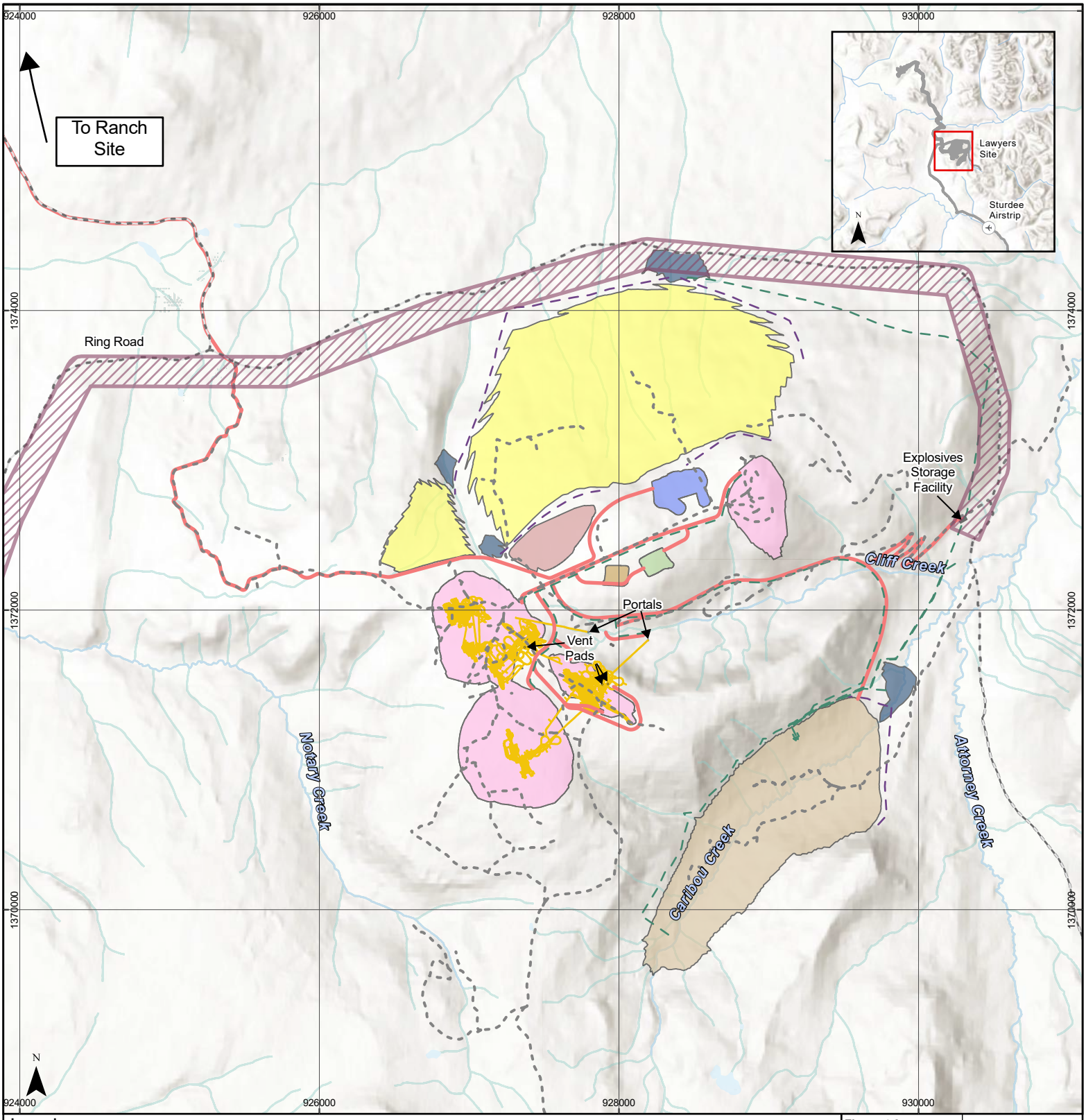
December 17, 2025

THESIS GOLD

Project Overview: Potential Transmission Line Extension Corridor

Lawyers-Ranch Project
Plain Language Summary

CHU CHO ENVIRONMENTAL one-eighty SLR



Legend

- Existing Access Road
- Existing Roads
- Watercourse
- Collection and Diversion Channel
- Pipeline
- Access Road
- Underground Mining Area
- Open Plt Areas
- Ore Processing Plant
- Waste Rock Storage Facility
- Tailings Management Facility
- Potential Transmission Line Extension Corridor
- Accomodations Complex
- Water Management Pond
- Ancillary Facilities
- High Grade Stockpile

North American Datum 1983
NAD 1983 BC Environment Albers

Map Center Coordinates: -127.20567° 57.33435°
Project Coordinates: -127.282014° 57.402529°
Project NTS Map: 94E
Scale: 1:35,000

Source Notes:
1. Basemap Data: GeoBC Data Distribution
2. Basemap: ESRI Topographic
3. Data supplied by Thesis Gold on 2025-01-16
4. Prepared by Chu Cho Environmental

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Kilometres

Figure 4-3
Rev. 2

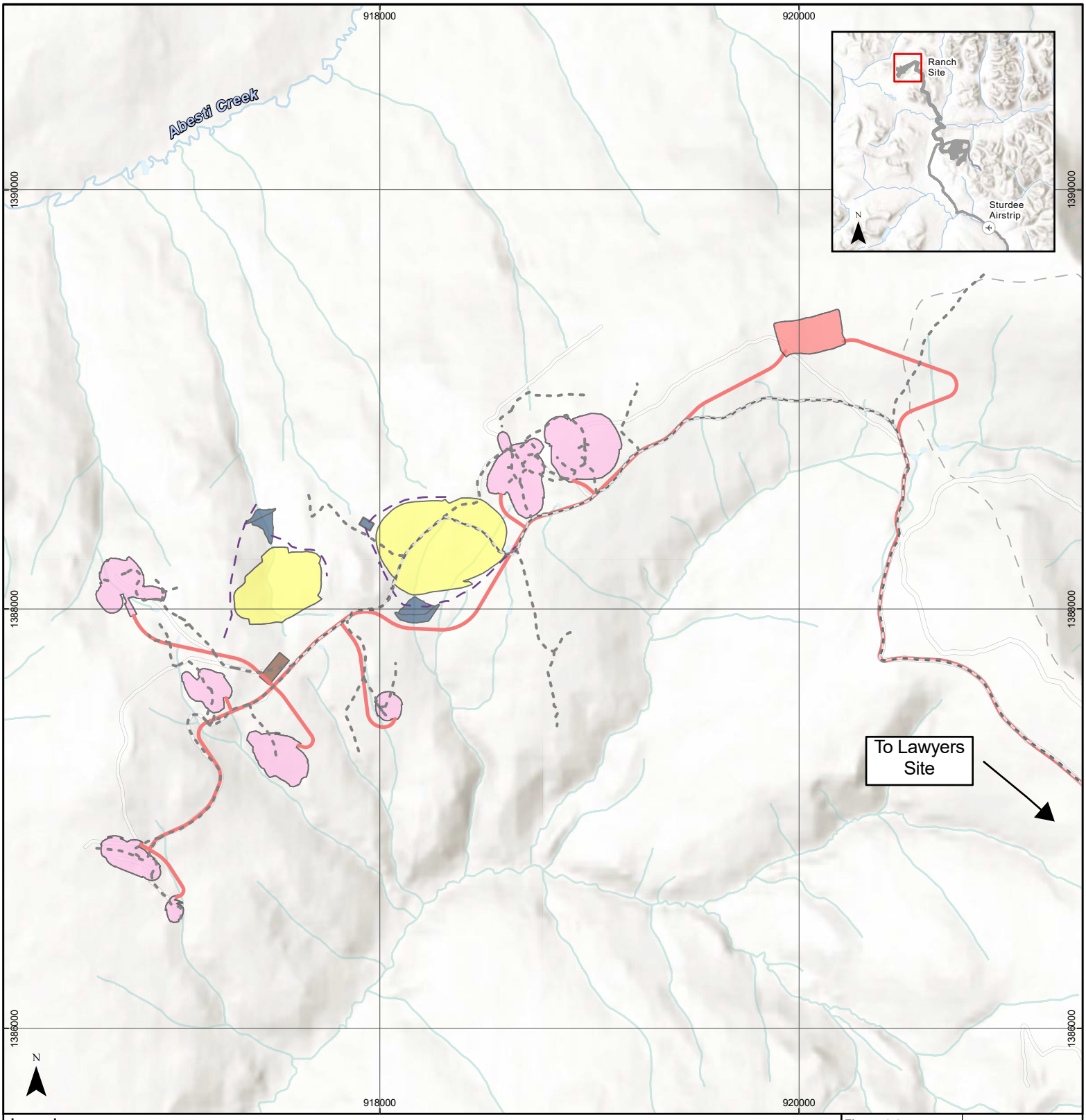
December 17, 2025

THESIS GOLD

Project Layout - Lawyers Site

Lawyers-Ranch Project
Plain Language Summary

CHU CHO ENVIRONMENTAL one-eighty SLR



Legend

- Existing Access Road
- Existing Roads
- Watercourse
- Collection and Diversion Channel
- Access Road
- Open Pit Areas
- Waste Rock Storage Facility
- Water Management Pond
- Water Treatment Plant
- Ore Stockpile Pad

North American Datum 1983
NAD 1983 BC Environment Albers

Map Center Coordinates: -127.35561° 57.47547°
Project Coordinates: -127.282014° 57.402529°
Project NTS Map: 94E
Scale: 1:25,000

Source Notes:
1. Basemap Data: GeoBC Data Distribution
2. Basemap: ESRI Topographic
3. Data supplied by Thesis Gold on 2025-01-16
4. Prepared by Chu Cho Environmental

0 0.5 1
Kilometres

Figure 4-4
Rev. 2

December 17, 2025

THESIS GOLD

Project Layout - Ranch Site

Lawyers-Ranch Project
Plain Language Summary

CHU CHO ENVIRONMENTAL one-eighty SLR

4.3 Project Phases and Activities

The Project is proposed to be carried out over four phases: construction, operation, closure, and post-closure. For simplicity, closure and post-closure are discussed together. An overview of the timing and activities during each Project phase is provided in Table 4-2.

4.3.1 Construction Phase

The construction phase will last approximately two years and will happen in two stages. The first stage, called “early works”, prepares the site for full construction. This includes clearing land, building worker accommodations and support facilities, extending the power line, and upgrading access roads. The second stage, called “development construction”, involves building the OPP, constructing the starter dam for tailings storage, removing topsoil and rock, stockpiling useful materials, and upgrading onsite roads. Some underground mining infrastructure will be built during late construction or early operations. Known seasonal timing constraints, including sensitive windows and periods, for migratory birds, fish, and other wildlife will be factored into the development of the detailed construction schedule and considered in the EAC Application. For example, at the Project site, the bird nesting window is from March 31 to August 1, and the fish spawning window is generally from June 1 to September 30. The caribou cautionary period is September 15 to January 14, and the caribou critical period is January 15 to July 15. Seasonal timing constraints will be used and be specific to individual species identified, as appropriate.

4.3.2 Operation Phase

The operation phase is expected to last between 14 to 20 years. Mining will use both OP and underground methods. Open-pit mining will be used for most of the ore, while underground mining will target deeper, high-grade deposits. Longhole stoping, which involves drilling and blasting is the underground technique that will be used. Operations will follow BC’s mining laws and safety codes. Mining will run 24 hours a day, 7 days a week, and 365 days a year, with 12-hour shifts for workers. Around 500 people will work onsite when operating at peak capacity.

The OPP will produce predominantly doré, as well as concentrate. Ore will be processed at an annual average rate of 5.1 Mtpa, or an average of 13,700 tonnes per day (tpd). The daily per annum average throughput for the mill is estimated to be approximately 5,100 tpd. With the implementation of design features, the OPP would have the capacity to handle a maximum of 15,000 tpd of processed ore. Mining and mineral processing will produce both waste rock and tailings. Waste rock produced from the extraction process will be hauled either to the TSF, to be used as part of the containment structure, or to the WRSFs. Sequencing details related to the handling of waste rock will be refined in the mine plan. Tailings produced from ore processing will be deposited directly into the TMF from the OPP. The dam of the TSF will be strategically raised throughout the operation phase to increase storage capacity in a cost-effective and safe manner.

Doré and concentrate will be sold and shipped internationally. Transport of products off site will include a combination of air and ground transportation. The transportation route outlined in Figure 4-3 and the Sturdee Airstrip will be used to transport supplies and personnel to and from site during operations, while details on the transportation methods and frequency for operations have not yet been determined. Mined materials will be hauled between Project sites using onsite roads, and the final transportation methods and routes will be defined as Project planning advances. Road traffic associated with the transport of doré and concentrate from the Project area will be reviewed in future phases. It is expected the Project will produce predominantly doré which will have an immaterial impact on road traffic. Concentrate shipments, which would predominantly occur in years 1-3 of the operation phase, would potentially increase road traffic during these years. The amount of expected concentrate production in years 1 to 3 is still being assessed.

Support activities such as utilities, water and waste management, and environmental monitoring will continue throughout operations. Progressive reclamation—restoring land as work finishes—will also take place during operations. This helps make the final closure phase more efficient.

4.3.3 Closure and Post-Closure Phase

Closure and reclamation work will follow the requirements of a future *Mines Act* permit (issued following Project approval) and will be shaped by ongoing collaboration with Indigenous Nations. Thesis will prepare a Mine Plan and Reclamation Plan, which must be updated and submitted to MCM at least every five years, as required by BC's Health, Safety and Reclamation Code (BC Gov 2024a). Closure activities will include taking down buildings and infrastructure and transporting leftover materials to approved offsite waste facilities. These activities are expected to take approximately one year after mining ends.

Reclamation will focus on restoring the land. This includes stabilizing loose materials, reshaping the land, backfilling, loosening compacted soil, and planting vegetation to help the area return to a natural state over time. Once reclamation is complete and all permit conditions are met, the site enters the post-closure stage. At this point, the mineral claims return to the government, and the site is considered abandoned.

During post-closure, care and maintenance activities may continue for a time. These include monitoring the site, maintaining water management systems, and checking surface and groundwater quality to plan for long-term environmental stability.

Table 4-2: Summary of Activities by Project Phase

Project Phase	Stage	Activities
Construction (approximately 2 years)	Early Works	• Reactivation and upgrades of onsite road network, and construction of new road. • Construction of accommodation complex. • Clearing and grubbing. • Stripping and stockpiling of topsoil. • Earthworks, pads, and laydowns. • Construction and installation of transmission line extension, including clearing the corridor, installing poles, and stringing conductors. • Construction of ancillary facilities, including onsite utilities and services.
	Development Construction	Construction of: • Ore Processing Plant. • Portals and transfer pads. • Underground workings (i.e., tunnels, excavations, shafts, and decline to underground mine). • Pre-stripping of Open Pit (OP) areas. • Tailings Storage Facility (TSF) starter dam. • Waste Rock Storage Facility (WRSF).
Operation (approximately 14 to 20 years)	Operations	• Underground and OP mining (occurring simultaneously, including blasting, excavation). • Establishment of high-grade stockpiles • Road upgrades, as needed, to accommodate haul trucks. • Ore processing activities. • TSF dam raises. • Transportation and hauling ore onsite. • Transportation of doré and concentrate offsite. • Operation of TMF and WRSFs. • Ancillary facilities. • Operational closure/progressive reclamation. • Water treatment and management.

Project Phase	Stage	Activities
Closure	Closure and Reclamation	• Managing waste, including transporting waste from site. • Dismantling and disposing of structures and equipment, including utilities. • Decommissioning pit pumping systems. • Long-term stabilization of exposed erodible materials. • Backfilling, re-sloping, scarifying (which refers to removing excess organic matter), and revegetating decommissioned areas to perpetuate a long-term revegetated state. • Regrading of access roads, ponds, ditches, and borrow areas not required beyond mine closure.
Post-Closure	Post-Closure (will continue until permit conditions are met)	• Monitoring of decommissioned infrastructure (e.g., WRSFs, TSF). • Long-term monitoring.

4.4 Water Requirements and Management

Thesis is carrying out detailed studies to understand how the Project might affect surface water and groundwater. These studies are being done in collaboration with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation. Early results have helped shape the Project's water management approach to use water efficiently, reduce environmental impacts, and prepare for climate change. Water for the Project will come from both surface water and groundwater. During construction and operations, water will be collected from runoff in Project areas, including OPs. This runoff is classified as either contact or non-contact water.

Contact water will be collected and used where possible for Project activities. Work is ongoing to evaluate various water management and water treatment options for both contact and non-contact water. The results of ongoing data analysis and water quality modelling will inform the appropriate level of treatment in each case and will be presented in the EAC.

Groundwater wells will also be installed to provide backup water, if needed. Water used in ore processing will be recovered and recycled within the OPP to reduce the need for fresh water.

4.5 Emissions, Discharges, and Waste

The Project is expected to produce emissions, discharges, and waste, including air and dust emissions, greenhouse gases (GHG), noise, and mining-related waste.

4.5.1 Air and Dust Emissions

Air and dust emissions will come from vehicles, machinery, equipment, incinerators, and dust from mining, processing, and transportation activities.

4.5.2 Greenhouse Gas Emissions

GHG emissions will be generated mainly from diesel fuel use, explosives, electricity consumption, and land disturbance. Canada's Emissions Reduction Plan and BC's CleanBC Initiative require large projects to plan for net-zero emissions by 2050. Thesis has already made design choices to reduce emissions, such as combining two sites into one and placing infrastructure strategically to reduce travel distances. The Project's estimated GHG emissions are about 113 kilotonnes of carbon dioxide equivalent ($ktCO_2e$) during construction and 581 $ktCO_2e$ during operations. These estimates will be refined as the Project progresses and will be reviewed with Indigenous Nations.

4.5.3 Noise Emissions

Noise will be generated by activities such as drilling, aircraft use, heavy machinery, and mineral processing. The potential effects of noise produced by the Project are anticipated to interact with a limited number of noise receptors due to the Project location. The mill building will also be enclosed, further reducing the potential for noise generation at the Project site.

4.5.4 Mining Waste and Tailings

The Project will also produce mining waste, including waste rock and tailings. Early testing shows that tailings are not expected to cause acid or metal pollution. Waste rock will be reused where possible, such as in road and infrastructure construction. Tailings will be stored in a TMF and water runoff will be managed with ditches and treatment systems.

4.5.5 Waste

Other waste from the Project will include industrial and domestic waste. Waste will be sorted and managed onsite, with incinerators for organic waste, storage areas for recyclables, and transfer facilities for hazardous materials. Hazardous waste, such as used batteries and petroleum products, will be stored securely and shipped to approved disposal sites. Waste tracking will follow federal and provincial regulations to completely comply with required safety and environmental protection.

4.6 Alternatives to the Project

The location of the ore bodies is fixed, and their characteristics determine how the ore can be mined, how fast it can be processed, and what infrastructure is needed. Because of this, there are only two realistic options for the area: move forward with the Project or not develop it at all. The preferred option is to proceed with the Project because it will support Canada's resource-based economy and bring social and economic benefits, including job creation. Thesis has not identified any other viable way to mine the gold and silver at this site that would meet the Project's goals and deliver similar benefits. As a result, no other alternatives have been considered further.

4.7 Alternative Means for Carrying Out the Project

Thesis has explored the different ways to carry out the Project that are technically and economically feasible. This includes looking at the best available technologies and considering feedback from Indigenous Nations. Thesis completed an alternatives assessment in 2021 to evaluate options for managing tailings and waste rock. These options were shared with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation, and their feedback has been incorporated into the design set out in this IPD. The alternatives assessment looked at seven possible locations for the TMF, six for the WRSF at the Lawyers Site, and seven possible locations for the Ranch Site WRSF. Options were evaluated based on location, terrain, distance to other Project components, efficiency, and environmental impact. The preferred options reduced the Project's footprint, leading to a single processing plant and TMF instead of separate facilities at each site. This change reduced the footprint by at least 11.6 ha.

In addition, selected technology for the control or treatment of effluent for the Project will meet Technology Readiness Level 7 as outlined in the requirements of the Technology Readiness Assessment Interim Technical Guidance (EMLI 2022).

Thesis will continue to assess alternatives throughout the Project. These assessments will consider how many options are available, how practical and cost-effective they are, safety and risk, potential environmental and social impacts, and feedback from Indigenous Nations. Engagement with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation has helped shape key decisions, such as combining the Lawyers and Ranch sites, choosing the Project's power source, selecting technologies, and deciding where to place infrastructure.

Thesis hosts co-design workshops with these Nations to gather input on environmental, wildlife, community, health, and cultural heritage topics. Feedback from these workshops has already influenced Project planning and will continue to guide future decisions.

Alternatives will continue to be assessed and informed by engagement with Indigenous Nations and other stakeholders, and the final outcomes will be presented in the EAC Application.

4.7.1 Other Considerations

In addition to the assessment of the TMF and WRSF locations and technologies, the below were considered:

- **Mining Method Selection:** Open pit and underground mining methods were considered, with a decision not to pursue fully underground mining due to economic feasibility.
- **Project Consolidation:** Consolidating the two projects was determined to be financially advantageous.
- **Infrastructure Availability:** Existing infrastructure is limited; upgrades will be made to the Cheni Airstrip, Cheni Road, and Ranch Road.
- **Tailings Management Technology:** Filtered tailings were considered but rejected due to high energy demands and cost implications, particularly given the potential need for self-generated power.

5.0 Legislative and Regulatory Context

The Project is planned to take place on provincial Crown land and will not be developed on federal land. The nearest federal lands are federal *Indian Act* Reserves; the nearest is located approximately 100 km from the Project. Thesis has not requested nor received federal funding for the Project. So far, no government policies have been identified that would conflict with the Project. Thesis is also not aware of any regional studies or assessments near the Project site, other than work related to the historic Cheni mine, local exploration, and environmental studies done for this Project. No strategic assessments relevant to the Project have been completed. Under Section 95 of the *Impact Assessment Act*, the Project will undergo a Strategic Assessment of Climate Change (ECCC 2020).

There are no known relevant government policies that the Project is not compatible with at this time. No known applicable international agreements between the Province and state or federal governments apply to the Project.

5.1 Federal Impact Assessment Act and British Columbia Environmental Assessment Act

Because the Project plans to process about 5.1 Mtpa of ore, it meets the threshold for a provincial EA under BC's *Environmental Assessment Act*. It also qualifies as a "designated project" under the federal *Impact Assessment Act* due to its ore input capacity.

Given the proposed production rate, the Project will also require a federal decision statement, as it is considered a "designated project" under the federal *Physical Activities Regulations* (SOR/2019-285) of the *Impact Assessment Act*. The Project also includes the activities to construct, operate, decommission and abandon a new metal mill with an ore input capacity of 5,000 tpd or more, which is described in item 18 (d) of the Schedule to the Regulations.

5.2 Substitution and Assessment Timing

When both federal and provincial assessments are required, they can be combined into one process called "substitution. In accordance with the *Impact Assessment Cooperation Agreement between Canada and British Columbia (Government of Canada 2020).* This process allows both governments to make independent decisions based on a shared assessment. Thesis has asked the government of BC to request federal approval for a substituted assessment process.

In addition to the EA, the Project may require other provincial and federal permits and approvals. These will be confirmed by regulatory authorities as part of the assessment process.

5.3 Other Anticipated Provincial and Federal Permits, Licenses, and Approvals

A summary of other anticipated provincial and federal permits and approvals that may be required for the Project are outlined in Table 5-1 and Table 5-2. A list of existing permits and approvals obtained by Thesis is provided in Section 3.5.

Table 5-1: Anticipated Provincial Permits, Licenses, and Approvals

Permit, License, or Approval	Legislation	Responsible Agency	Description
Mines Act permit	*Mines Act* (BC Gov 1996a)	Ministry of Mining and Critical Minerals (MCM)	Approves the mine plan and the reclamation and closure plan.
License of Occupation	*Land Act* (BC Gov 1996d)	Ministry of Water, Land and Resource Stewardship (WLRS)	Authorizes the use of Crown land for transmission lines and other supporting infrastructure.
Waste Discharge Permit and Waste Storage Approval	*Environmental Management Act* (BC Gov 2003a)	Ministry of Environment and Parks (ENV)	Permits discharge of effluent to water, storage/treatment of wastes, disposal of solid waste to land, and discharge of emissions to the atmosphere.
Heritage Conservation Act s. 12.2 Heritage Inspection Permit or Heritage Investigation Permit; s. 12.4 [Site] Alteration Permit	*Heritage Conservation Act* (BC Gov 1996c)	Ministry of Forests, Archaeology Branch	Authorizes Heritage inspection, investigation, or site alteration of lands potentially affected by the Project.
Wildlife Act Permit	*Wildlife Act* (BC Gov 1996g)	ENV, Environmental Stewardship Division	Permits wildlife salvages and surveys of wildlife and their habitat, and bird nest removal or relocation.
Construction Permit for a Potable Water Well	*Drinking Water Protection Act* (BC Gov 2001)	BC Ministry of Health, Northern Health Authority	Permits construction of a groundwater well for domestic water use.
Water System Construction Permit	*Drinking Water Protection Act* (BC Gov 2001)	BC Ministry of Health, Northern Health Authority	Required for construction of a potable water system for temporary, seasonal accommodation complexes.
Drinking Water System Operations Permit	*Drinking Water Protection Act* (BC Gov 2001)	BC Ministry of Health, Northern Health Authority	Required for operation of a potable water system at temporary, seasonal accommodation complexes.

Permit, License, or Approval	Legislation	Responsible Agency	Description
Short Term Use of Water Permit	*Water Sustainability Act* (BC Gov 2014)	ENV, Water Stewardship Branch	Required for short-term use of water from freshwater streams and lakes.
Water Sustainability Act Approval	*Water Sustainability Act* and corresponding Dam Safety Regulation (BC Gov 2014; BC Gov 2016)	WLRS	Required for changes relating to streams including diversions, storage and use of water, and nuisance water management from mining operations.
Water License	*Water Sustainability Act* (BC Gov 2014)	WLRS	Required for construction and operation of Project activities requiring the diversion of surface waters or groundwater sources for potable or process water.
Effluent Discharge Permit	*Environmental Management Act* (BC Gov 2003a)	ENV	Required for the discharge of wastewater and other effluents into the environment.
Licenses to Cut	*Forest Act*, Part 3, Section 8.2, License to Cut Regulation and Provincial Forest Use Regulation (BC Gov 1996a; BC Gov 2006; BC Gov 1995)	Ministry of Forests, Forest Tenures Branch	Required to harvest Crown timber in a specific area over a relatively short time period.
Industrial Access Permit	*Transportation Act* (BC Gov 2004)	Ministry of Transportation and Transit	Required for new roads that join onto public roads controlled by the Ministry of Transportation.
Special Use Permit	*Mining Right of Way Act*, section 3, and the *Forest Practices Code of British Columbia Act* (BC Gov 1996f; BC Gov 1996g)	Ministry of Forests	Required for the construction or maintenance of a road, bridge, or drainage structure, weather station, weight scales, or quarries used for road construction or maintenance on Crown land within a provincial forest.

Permit, License, or Approval	Legislation	Responsible Agency	Description
Permit for Regulated Activities	*Public Health Act* (BC Gov 2008)	Ministry of Health	A required permit for worker accommodation due to the need to provide potable water, processing wastewater, or managing septic systems.
Hazardous Waste Generator Registration	*Environmental Management Act*, Hazardous Waste Regulation (BC Gov 2003b)	ENV	A registration process required for the owner of waste (e.g., property owner) that is identified as being hazardous, which involves detailing the steps taken to store hazardous waste at the generation location.
Sewage Registration	*Environmental Management Act,* Wastewater Regulation (BC Gov 2003c)	ENV	Mandatory registration identifying specific information about sewage discharge activities.
Food Service Permits	*Public Health Act* (BC Gov 2008)	Provincial Health Services Authority	Required to operate a kitchen in a mining accommodation complex.
Code of Practice for the Concrete and Concrete Products Industry – Discharge Registration	*Environmental Management Act,* Code of Practice for the Concrete and Concrete Products Industry (MECCS 2007)	Ministry of Environment & Climate Change Strategy	Required for discharging to the environment from concrete and concrete products industry

Table 5-2: Anticipated Federal Permits, Licenses, and Approvals

Permit, License or Approval	Federal Legislation	Responsible Agency	Description
Authorization under Paragraphs 34.4(2)(b) and 35(2)(b)	*Fisheries Act* (Government of Canada 1985b)	Fisheries and Oceans Canada (DFO)	Regulates work or activities that may result in the death of fish or that may result in the harmful alteration, disruption, or destruction of fish habitat.
Migratory Birds Convention Act, 1994 Authorization	*Migratory Birds Convention Act, 1994*, Migratory Bird Sanctuary Regulations (Government of Canada 1994a; Government of Canada 1994b)	Environment and Climate Change Canada (ECCC)	Regulates the deposit of substances potentially harmful to migratory birds or vegetation clearing during the migratory bird nesting season (as outlined by ECCC for the Project area, Zone A2, early April to mid-August [ECCC 2025]).
Species at Risk Act Permit	*Species at Risk Act* (Government of Canada 2002)	ECCC, DFO	Permit is required in situations where the Project needs to undertake activities that affect a listed wildlife species.
Explosive Licenses and Permits	*Explosives Act*, Explosives Regulations, 2013 (Government of Canada 1985a; Government of Canada 2013)	Natural Resources Canada	An Explosive License is required for factories and magazines, and an Explosive Permit is required for vehicles used for the transportation of explosives.
Transportation of Dangerous Goods Permits	*Transportation of Dangerous Goods Act, 1992* (Government of Canada 1992)	Transport Canada	Permits are required for the classification, documentation, marking, means of containment, required training, emergency response, accidental release, and protective measures associated with the transportation of dangerous goods. Permits are also required for the transportation of dangerous goods by road, rail, or air.

6.0 Indigenous Nations Interests and Engagement

Thesis is committed to engaging early and respectfully with potentially affected Indigenous Nations. This includes open and flexible communication that supports meaningful input into Project planning and design. Engagement efforts are designed to be practical, responsive, and inclusive of Indigenous perspectives.

Drafts of the IPD and the EP were shared with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation for review. Thesis provided capacity funding and availability to meet to discuss feedback on the draft documents in advance of submitting the IPD to government. Comments received from the Nations were addressed, as appropriate, in the IPD and EP prior to regulatory submission. Where comments may not have been resolved prior to filing with the EAO, Thesis will establish follow up or next steps to continue discussions as the Project progresses through the EA.

6.1 Identified Indigenous Nations

Thesis used several sources to identify Indigenous Nations to engage with early on in the Project. These sources include BC's Consultation Areas Spatial Tool, which shows where Indigenous Nations may hold treaty rights or asserted or proven Aboriginal rights or title and interests (Consultation Area); an ethnohistorical report (i.e., a report on the history and cultures of nearby Indigenous peoples) to understand which Nations may have a historical presence near the Project (Clark 2025); government referrals from early permitting processes; and direct conversations with Nations that expressed interest or concern. Based on this work, Thesis identified nine Indigenous Nations whose Consultation Areas overlap with the Project: Binche Whut'en, Daylu Dena, Dease River First Nation, Kwadacha Nation, Liard First Nation, Tahltan Nation, Takla Nation, Tsay Keh Dene Nation, and West Moberly First Nations.

Thesis began engagement as early as 2018 with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation and Tahltan Nation. These Nations have helped shape the Project's early planning and exploration activities. Thesis understands that the list of Nations involved may change as the EA moves forward and will engage with Indigenous Nations with Aboriginal rights or interests that could be affected by the Project. Engagement will be tailored to each Nation's interests and priorities and may include meetings, opportunities to review and comment on EA materials, and other ways to share feedback. Thesis will continue to work collaboratively with Indigenous Nations to foster meaningful participation in Project planning and decision-making.

6.2 Indigenous Nation Background and Applicable Agreements

Thesis is developing the Project with input from Indigenous Nations through ongoing review and engagement activities. Thesis understands that input received reflects each Nation's governance systems and approaches. To date, no Indigenous laws, customs, or policies have been shared that are relevant to the Project. Known agreements between Indigenous Nations and the government that may influence the Project are described in the following sections, though others may be identified or come into effect during the EA process.

6.2.1 Kwadacha Nation

Kwadacha Nation's traditional territory is in north-central BC. The main community, Kwadacha (also known as Fort Ware, which has been mentioned above), is located about 430 km north-northwest of Prince George and roughly 95 km east of the Project site. Kwadacha Nation has three Reserves near Fort Ware, covering a total area of about 385 ha. As of September 2025, the Nation had 615 registered members, with 315 living on Reserve lands (CIRNAC 2025b).

Thesis has provided contracting opportunities and other economic development of Kwadacha Nation through an equity agreement, making the Nation an investor in the Project. Thesis expects that additional opportunities will be created for Kwadacha Nation and its members to increasingly participate in the regional economy as the Project advances.

In February 2024, Kwadacha Nation and the government of BC signed a Reconciliation Framework Agreement. This agreement sets out a process for long-term reconciliation and joint decision-making in areas such as land use and economic development (Kwadacha Nation and BC Gov 2024). Kwadacha Nation is also negotiating independently with the governments of Canada and BC outside of the BC Treaty Process (BC Gov 2024b). Thesis is aware of other agreements between Kwadacha Nation and the government of BC related to natural resource use, but these are not believed to be directly relevant to the EA.

Thesis is also monitoring the Kaska–BC Land Use Planning Project process, a land use planning initiative between the government of BC and the Kaska Dena Council, of which Kwadacha Nation is a member. While Thesis has not yet engaged directly with Kwadacha Nation on this initiative, Thesis remains open to understanding how the outcomes may affect the Project in the future.

6.2.1.1 Summary of Engagement To Date

Thesis and Kwadacha Nation have engaged through a range of methods, including meetings and workshops, as well as regular email correspondence and phone discussions. Engagement with Kwadacha Nation has been extensive and ongoing over several years. Engagement activities have included: regular meetings, site visits, community events, and correspondence. This engagement has helped towards building familiarity, establishing clear communication channels, and informing key aspects of Project planning and environmental stewardship.

In addition to the agreements summarized above, recent collaborative efforts have focused on gathering feedback related to Project planning and design, as well as on the drafts of the IPD and EP:

- **Environmental Stewardship Workshop (October 2024):** Thesis met with representatives of Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation to discuss how their stewardship goals and Indigenous Knowledge could inform existing conditions studies, helping to shape how these studies are reflected in the IPD and the EP's approach to collaborative engagement.
- **Input on Secondary Sources (November 2024):** Thesis shared a preliminary list of proposed secondary sources pertaining to Kwadacha Nation to inform descriptions of the Nation in the IPD and EP, and invited review and additions to support the accuracy and completeness of the information.

- **EA Process Presentation (December 2024):** Thesis provided an overview presentation on the provincial and federal EA processes, outlining Nation involvement opportunities, timelines, and how engagement would be carried out through Early Engagement and subsequent stages.
- **Co-Design Workshop (June 2025):** Thesis held and attended an in-person workshop with Kwadacha Nation representatives and members to gather input on Project components with design flexibility, such as the TSF, waste rock storage facilities, accommodations complex, and transmission line. Nation perspectives were integrated into the evaluation of design options for the Pre-Feasibility Study, and action items for future engagement were identified.
- **Notification and Capacity Support (June 2025):** Thesis notified Kwadacha Nation of Thesis's intent to provide draft IPD and EP materials for review in the near future, and provided capacity funding to support the process, bridging to a future EA collaboration/capacity funding agreement.
- **Advance Review of Draft IPD and EP (September 2025):** Thesis shared working drafts of the IPD and EP ahead of submission to regulators, and invited a collaborative review supported by meetings to discuss Kwadacha Nation's feedback.
- **Response to Feedback on IPD and EP (October 2025):** Thesis considered Kwadacha Nation's feedback and engaged with the Nation to discuss how its input was incorporated into the IPD and EP, as well as how it will be addressed in future work.

6.2.2 Tsay Keh Dene Nation

Tsay Keh Dene Nation's traditional territory is located in north-central BC. The main community is at Tsay Keh Dene, about 360 km north-northwest of Prince George and approximately 145 km southeast of the Project site. The Nation has six Reserves near the community, covering a total area of about 1,443 ha (CIRNAC 2025e). As of September 2025, Tsay Keh Dene Nation had 522 registered members, with 225 living on Reserve lands or nearby Crown lands where the Nation holds rights.

Thesis has signed a series of exploration agreements with Tsay Keh Dene Nation to support cooperation and communication during mineral exploration for the Project; an EA Collaboration Agreement to guide how the parties will work together through the EA and an equity agreement whereby Tsay Keh Dene Nation became an investor in the Project. The Nation is currently in Stage 4 of the BC Treaty Process and is negotiating with the governments of Canada and BC. In March 2023, Tsay Keh Dene Nation and the government of BC signed an Incremental Treaty and Reconciliation Agreement (Tsay Keh Dene First Nation and BC Gov 2023). This agreement sets out a process for developing a full treaty and advancing long-term reconciliation, including shared decision-making on land use and economic development.

Tsay Keh Dene Nation is also part of a 2020 Environmental Stewardship Initiative Agreement with the BC. This agreement supports collaborative planning based on both Indigenous Knowledge and science to assess cumulative effects and promote ecosystem-based stewardship (Tsay Keh Dene Nation and BC Gov 2020). Thesis is aware of other agreements between Tsay Keh Dene Nation and the government of BC related to natural resource use, but these are not believed to be directly relevant to the EA.

6.2.2.1 Summary of Engagement To Date

Thesis and Tsay Keh Dene Nation have engaged through a range of methods, including meetings and workshops, as well as regular email correspondence and phone discussions. Engagement with Tsay Keh Dene Nation has been extensive and ongoing over several years. Engagement activities have included: regular meetings, site visits, community events, and correspondence. This engagement has helped towards building familiarity, establishing clear communication channels, and informing key aspects of Project planning and environmental stewardship.

In addition to the agreements summarized above, recent collaborative efforts have focused on gathering feedback related to Project planning and design, as well as on the drafts of the IPD and EP:

- **Environmental Stewardship Workshop (October 2024):** Thesis met with representatives of Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation to discuss how their stewardship goals and Indigenous Knowledge could inform existing conditions studies, helping to shape how these studies are reflected in the IPD and the EP's approach to collaborative engagement.
- **Input on Secondary Sources (November 2024):** Thesis shared a preliminary list of proposed secondary sources pertaining to Tsay Keh Dene Nation to inform descriptions of the Nation in the IPD and EP, and invited review and additions to support the accuracy and completeness of the information.
- **EA Process Presentation (December 2024):** Thesis provided an overview presentation on the provincial and federal EA processes, outlining Nation involvement opportunities, timelines, and how engagement would be carried out through Early Engagement and subsequent stages.
- **Co-Design Workshop (June 2025):** Thesis held an in-person workshop with Tsay Keh Dene Nation representatives and members to gather input on Project components with design flexibility, such as the TSF, waste rock storage facilities, accommodations complex, and transmission line. Nation perspectives were integrated into the evaluation of design options for the Pre-Feasibility Study, and action items for future engagement were identified.
- **Notification and Capacity Support (June 2025):** Thesis notified Tsay Keh Dene Nation of Thesis' intent to provide draft IPD and EP materials for review in the near future, and provided capacity funding to support the process, bridging to a future EA collaboration/capacity funding agreement.
- **Advance Review of Draft IPD and EP (September 2025):** Thesis shared working drafts of the IPD and EP ahead of submission to regulators, and invited a collaborative review supported by meetings to discuss Tsay Keh Dene Nation's feedback.
- **Response to Feedback on IPD and EP (October 2025):** Thesis considered Tsay Keh Dene Nation's feedback and engaged with the Nation to discuss how its input was incorporated into the IPD and EP, as well as how it will be addressed in future work.

6.2.3 Takla Nation

Takla Nation's traditional territory is located in north-central BC. The main community, Takla Landing, is about 110 km north of Smithers and roughly 235 km south-southeast of the Project site. Takla Nation has 17 Reserves around Takla Lake and Bear Lake, covering a total area of approximately 809 ha (CIRNAC 2025d). As of September 2025, the Nation had 961 registered members, with 208 living on Reserve lands.

Thesis has provided contracting opportunities and other economic development of Takla Nation through an equity agreement, making the Nation an investor in the Project. Thesis expects that additional opportunities will be created for Takla Nation and its members to increasingly participate in the regional economy as the Project advances. Takla Nation is currently in Stage 4 of the BC Treaty Process, negotiating with the governments of Canada and BC (BC Gov 2023b).

Thesis is aware that Takla Nation has other agreements with the government of BC related to natural resource use, but these are not believed to be directly relevant to the EA.

6.2.3.1 Summary of Engagement To Date

Thesis and Takla Nation have engaged through a range of methods, including meetings and workshops, as well as regular email correspondence and phone discussions. Engagement with Takla Nation has been extensive and ongoing over several years, involving regular meetings, site visits, community events, and frequent correspondence. This engagement has helped build familiarity, establish clear communication channels, and inform key aspects of Project planning and environmental stewardship.

In addition to the agreements summarized above, recent collaborative efforts have focused on gathering feedback related to Project planning and design, as well as on drafts of the IPD and EP:

- **Environmental Stewardship Workshop (October 2024):** Met with representatives of Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation to discuss how their stewardship goals and Indigenous Knowledge could inform existing conditions studies, helping to shape how these studies are reflected in the IPD and the EP's approach to collaborative engagement.
- **Input on Secondary Sources (November 2024):** Shared a preliminary list of proposed secondary sources pertaining to Takla Nation to inform descriptions of the Nation in the IPD and EP, and invited review and additions to support the accuracy and completeness of the information.
- **EA Process Presentation (December 2024):** Provided an overview presentation on the provincial and federal EA processes, outlining Nation involvement opportunities, timelines, and how engagement would be carried out through Early Engagement and subsequent stages.
- **Co-Design Workshop (June 2025):** Held an in-person workshop with Takla Nation representatives and members to gather input on Project components with design flexibility, such as the TSF, waste rock storage facilities, accommodations complex, and transmission line. Nation perspectives were integrated into the evaluation of design options for the Pre-Feasibility Study, and action items for future engagement were identified.

- **Notification and Capacity Support (June 2025):** Notified Takla Nation of Thesis' intent to provide draft IPD and EP materials for review in the near future, and provided capacity funding to support the process, bridging to a future EA collaboration/capacity funding agreement.
- **Advance Review of Draft IPD and EP (September 2025):** Shared working drafts of the IPD and EP ahead of submission to regulators, and invited a collaborative review supported by meetings to discuss Takla Nation's feedback.
- **Response to Feedback on IPD and EP (October 2025):** Considered Takla Nation's feedback and engaged with the Nation to discuss how its input was incorporated into the IPD and EP, as well as how it will be addressed in future work.

6.2.4 Tahltan Nation

Tahltan Nation's traditional territory is located in northwestern BC. The Nation is made up of two bands: Tahltan Band and Iskut Band. Both bands are represented by the Tahltan Central Government (TCG), which acts as their main administrative governing body. Tahltan Band's main community is in Telegraph Creek, about 225 km west-northwest of the Project site and includes 12 Reserves covering roughly 1,377 ha (CIRNAC 2025c). Iskut Band's main community is at Kluachon Lake, about 157 km east-northeast of the Project site, with three Reserves totaling approximately 162 ha. As of September 2025, Tahltan Band had 2,218 registered members (299 living on Reserve) and Iskut Band had 827 registered members (341 living on Reserve; CIRNAC 2025a).

Thesis has entered into a series of exploration agreements with Tahltan Nation to support cooperation and communication during mineral exploration for the Project. Thesis is currently in discussions with Tahltan Nation concerning an agreement that will guide how the parties will work together through the EA.

In 2013, the TCG and the government of BC signed a Shared Decision-Making Agreement (TCG and BC Gov 2013). This agreement supports a government-to-government relationship and outlines how both parties will work together on land and resource decisions, including EAs, across Tahltan territory. The TCG is also negotiating independently with the governments of Canada and BC outside of the BC Treaty Process. Thesis is aware of other agreements between TCG and the government of BC related to natural resource use, but these are not thought to be directly relevant to the EA.

6.2.4.1 Summary of Engagement To Date

Thesis and Tahltan Nation have engaged through numerous methods, including email correspondence, phone discussions, and meetings over the past several years. This engagement has helped build familiarity, establish clear communication channels, and create a foundation for increased engagement as the Project advances through EA.

Recently, Thesis has sought to engage with Tahltan Nation for the purpose of receiving early review and input from the Nation on drafts of the IPD and EP. In June 2025, Tahltan Nation was notified of Thesis's intent to provide draft IPD and EP materials for review in the near future, and provided capacity funding to support the process, bridging to a future EA collaboration/capacity funding agreement. As noted above, Tahltan Nation was unable to review and provide feedback prior to formal regulatory submission. Thesis remains committed to receiving and addressing feedback in collaboration with Tahltan Nation through future EA deliverables and engagement activities, as appropriate.

Thesis and Tahltan Nation have also initiated discussions to advance a Tahltan Land Use and Occupancy Study and capacity funding agreement for EA participation. Thesis looks forward to collaborating with Tahltan Nation to further these initiatives.

6.3 Early Project Engagement and Development of the IPD and EP

6.3.1 Early Project Engagement

Since the beginning of Project planning, Thesis has worked closely with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation to help shape the Project's early development. This engagement has included a variety of activities tailored to each Nation, such as in-person meetings, site visits, community workshops, and regular communication by phone and email. The goal has been to share information, build mutual understanding, and align early on key aspects of the Project as it moves forward. Input from Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation has influenced many planning decisions, including environmental monitoring, reclamation planning, data collection, and the layout and design of Project infrastructure. Tahltan Nation has also contributed through a long-standing relationship with Thesis that has helped guide Project planning and design.

A summary of these collaborative efforts is included in Table 6-1. The responses in Table 6-1 reflect Thesis' engagement to date, with the understanding that ongoing engagement is required to deepen discussions with Indigenous Nations and incorporate their feedback and interests into ongoing Project design as the EA proceeds.

Table 6-1: Summary of Project Collaborations with Indigenous Nations

Key Feedback Gathered through Collaboration on Project Prior to Submission of this Plain Language Summary	How the Proponent Addressed the Feedback
Interest in providing input on specific Project elements.	Thesis has provided opportunities for Indigenous Nation input on Project design through workshops focused on mine components with design flexibility. Based on this input, Thesis has re-aligned and relocated several proposed mine components, including moving the proposed Tailings Storage Facility (TSF) to avoid a culturally sensitive area.
Interest in economic opportunities related to the Project.	Thesis has supported Indigenous economic participation by providing over $50 million ($ denotes Canadian dollars) in contracting opportunities to Indigenous Nation-owned or affiliated companies, exploring opportunities for Indigenous equity ownership in the Project, and engaging with community members at career fairs and industry day events.
Management of cumulative effects of resource development in the Toodoggone mining region.	The Project is being developed on a brownfield site previously disturbed by historical mining. To limit the total disturbance footprint through ongoing exploration activities, Thesis has undertaken progressive reclamation of these areas and voluntarily committed to an exploration permit condition that limits the number of un-reclaimed drill sites at any given time. Thesis consolidated the Lawyers and Ranch projects into a single Project. Developing a single Project reduces the Project's overall disturbance footprint and contribution to cumulative effects in the region by using shared infrastructure such as the Ore Processing Plant and Tailings Management Facility.
Potential effects of developing mineral resources exclusively through open pit mining methods.	Thesis assessed the feasibility of using underground mining methods as an alternative to reduce surface disturbance. As a result, underground mining methods have been identified as feasible at the Lawyers Site and will be used where practicable.
Potential for site access to lead to increased public access to areas that are used for traditional activities, and for restrictions to impede access by Indigenous Nation members to the area in which the Project is located.	Thesis installed a gate along the site access road to limit public entry, while accommodating access for Indigenous Nation members to areas within Thesis' mineral claims that overlap with their traditional territory. It is noted that access requests by Indigenous Nation members cannot be accommodated in every case due to operational and safety requirements.

Key Feedback Gathered through Collaboration on Project Prior to Submission of this Plain Language Summary	How the Proponent Addressed the Feedback
Collection of aquatic existing conditions data from a lake of cultural importance, located approximately 30 kilometres from the Project.	Thesis commissioned a targeted aquatic study for the lake, conducted collaboratively with Indigenous Nations.
Identify and protect archaeological and heritage resources that may be affected by Project activities.	Thesis developed and implemented a Heritage Resource Protection Plan and Archaeological Chance Find Procedure with Indigenous Nation input, sought ethnographic (i.e., the study and systematic recording of) data from Indigenous Nations for inclusion in the Archaeological Overview Assessment, and invited Indigenous Nation representatives to participate in annual archaeological field visits.
Require capacity funding to support engagement, including on matters related to Project design and the Environmental Assessment (EA) process.	Thesis has provided annual capacity funding payments to Indigenous Nations since 2020. Additional funding has been made available to support specific initiatives, including the review of EA documents, participation in Project design workshops, and site visits.
Indigenous Nation preferences for EA process.	Thesis is engaging with Indigenous Nations to understand their specific preferences for engagement during the EA process. Thesis has concluded an EA Collaboration Agreements with Tsay Keh Dene Nation, and has initiated discussions with Kwadacha Nation, Takla Nation and Tahltan Nation respecting similar agreements.
Requests for in-community engagement and site visits for leadership and Elders.	Thesis has organized multiple site visits for Indigenous Nation leadership and Elders, including participation in onsite native seed and stem collection workshops for future site revegetation. In addition, Thesis has started visiting Indigenous Nation communities to introduce the company and the Project to community members. The frequency of visits is anticipated to increase over time.
Potential effects of Project activities on the land and the potential spread of non-native, invasive plant species.	Thesis implements a progressive approach to reclamation for the exploration program, which includes the implementation of a Reclamation Plan in collaboration with Indigenous Nations. Thesis employs full-time Reclamation Supervisors, has reclaimed approximately 90% of land disturbed by the company's exploration, and has invited Indigenous Nation representatives to participate in onsite seed and stem collection workshops to support future site revegetation.

Key Feedback Gathered through Collaboration on Project Prior to Submission of this Plain Language Summary	How the Proponent Addressed the Feedback
Potential effects of Project activities on wildlife.	Thesis has worked with Indigenous Nations to identify wildlife priorities and develop mitigation strategies for the ongoing mineral exploration program. This includes the creation of a Wildlife Monitoring and Management Plan and a Caribou Mitigation Strategy; both developed in collaboration with Indigenous Nations. Thesis also maintains full-time environmental representatives onsite, as well as an extensive wildlife camera network, and avoids mechanized work during sensitive wildlife periods.

6.3.2 Development of the IPD and EP

Drafts of the IPD and EP were shared with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation in advance of submission to government. Capacity funding was provided to each of these Nations to support their review of the draft documents. Thesis engaged with the Nations, where available, through written correspondence and meetings to review the documents and discuss feedback. Thesis used the feedback received to refine the IPD and EP and communicated how related areas of future work would be addressed.

At the time of writing, comments had been received from Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation. Thesis looks forward to engaging with Tahltan Nation on the IPD and EP through Early Engagement. Thesis will continue to engage with Indigenous Nations in line with the engagement approach and principles outlined in the IPD and EP.

6.3.3 Planned Indigenous Engagement

Thesis will continue to engage with Indigenous Nations in line with the engagement approach and principles outlined in the IPD and EP. Input and feedback received during Early Engagement will be tracked using structured engagement logs and issue-response tables. Where possible, Thesis will work with Indigenous Nations to review early drafts of future submissions or discuss preliminary content and will provide summaries of how feedback was considered and addressed in Project planning and design.

7.0 Government, Public, and Stakeholder Engagement

Thesis is committed to timely engagement with government agencies, the public, and other relevant stakeholders. This section briefly identifies relevant government agencies, the public, and stakeholders that may have an interest in the Project.

Thesis will continue to engage with government agencies, the public, and other relevant stakeholders, consistent with the engagement approach and principles outlined in the IPD. Input and feedback received during Early Engagement will be tracked using structured engagement logs and issue-response tables. These tools will document questions, concerns, and suggestions, and will inform the development of the DPD and, where appropriate, Project planning and design. Where possible, Thesis will work with government agencies, the public, and other relevant stakeholders to review early drafts or discuss preliminary content and will provide summaries of how feedback was considered and addressed in Project planning and design.

7.1 Government Agencies

Thesis has identified a preliminary list of government agencies that may be involved in the Project, based on their responsibilities and relevance to potential benefits and impacts (Table 7-1). This list will be updated as engagement continues. Thesis has been conducting exploration activities at the Project site since 2018, which required permits and coordination with government agencies. No public safety concerns have been raised by government agencies during this time. As the Project moves forward, Thesis will continue to work with relevant federal and provincial agencies throughout the EA and permitting processes. Agencies with a direct role in the Project will participate in the Technical Advisory Committee, led by the EAO, and some will also be responsible for issuing permits. Thesis will collaborate with the EAO to confirm the appropriate contacts for further engagement.

Table 7-1: Identified Local, Provincial, and Federal Government Agencies

Provincial Government Agencies
Environmental Assessment Office
Ministry of Environment and Parks
Ministry of Forests
Ministry of Indigenous Relations and Reconciliation
Ministry of Jobs, Economic Development and Innovation
Ministry of Mining and Critical Minerals
Ministry of Transportation and Transit
Ministry of Water, Land and Resource Stewardship
Northern Health
Federal Government Agencies
Impact Assessment Agency of Canada

Provincial Government Agencies
Fisheries and Oceans Canada
Environment and Climate Change
Natural Resources Canada
Transport Canada
Crown Indigenous Relations and Northern Affairs Canada
Indigenous Services Canada
Local Government
Peace River Regional District
District of Mackenzie
Town of Smithers
City of Prince George

Thesis has engaged with relevant government agencies to discuss the regulatory review process and approaches to ongoing engagement, which is an integral part of the EA process. Summaries of engagement with government agencies are provided in Table 7-2 and Table 7-3.

Table 7-2: Summary of Engagement with Federal and Provincial Governments

Date	Agencies	Summary of Engagement	Key Points and Actions
16-Jun-25	Environmental Assessment Agency (EAO), Ministry of Mining and Critical Minerals (MCM), and Ministry of Environment and Parks (ENV)	Introductory meeting between Thesis and provincial agencies to introduce the Project and to discuss initiating regulatory review in Fall 2025.	Discussion focused on Project introduction, opportunities for regulatory efficiency and predictability, and EAO's upcoming review of the Initial Project Description (IPD)/Engagement Plan (EP).
29-Jul-25	Impact Assessment Agency of Canada (IAAC)	Introductory meeting between Thesis and IAAC to introduce the Project to IAAC officials and to discuss initiating regulatory review in Fall 2025.	Discussion focused on Project introduction, opportunities for regulatory efficiency and predictability, and IAAC's upcoming review of the IPD.
02-Sep-25	EAO	Thesis shared a preliminary working draft IPD and EP with EAO for review.	Not applicable.
02-Sep-25	IAAC	Thesis shared a preliminary working draft IPD with IAAC for review.	Not applicable.

Date	Agencies	Summary of Engagement	Key Points and Actions
03-Sep-25	EAO	Thesis met with EAO to discuss Project details as well as collaboration and next steps to prepare for initiating Early Engagement.	Alignment on EAO's draft IPD/EP review. Meeting to be set with EAO and IAAC in early October 2025 to discuss steps for initiating process.
04-Sep-25	IAAC	Thesis met with IAAC to discuss collaboration and next steps for IPD review.	Not applicable.
05-Sep-25	EAO	EAO provided initial feedback on Thesis' preliminary drafts of the IPD and EP.	Thesis made applicable changes in the IPD and EP in advance of filing.
12-Sep-25	IAAC	IAAC provided initial feedback on Thesis' preliminary drafts of the IPD.	Thesis made applicable changes in the IPD in advance of filing.
09-Oct-25	EAO and IAAC	Thesis met with EAO and IAAC to discuss next steps for initiating Early Engagement.	Regular meetings initiated with Thesis, EAO, and IAAC for process coordination.
22-Oct-25	EAO and IAAC	First regular coordination meeting with EAO and IAAC to discuss Project updates.	Discussion focused on Indigenous and local government engagement, timelines for submission of the IPD and EP, and preparations for the public comment period.

Table 7-3: Summary of Engagement with Local Governments

Date	Local Government	Summary of Engagement	Key Points and Actions
22-Oct-25	Town of Smithers	Introductory meeting between Thesis and the Town of Smithers.	Discussion focused on Project introduction, anticipated regulatory process, and approach to ongoing engagement.
23-Oct-25	District of Mackenzie	Introductory meeting between Thesis and the District of Mackenzie.	Discussion focused on Project introduction, anticipated regulatory process, and approach to ongoing engagement.
24-Oct-25	Peace River Regional District	Introductory meeting between Thesis and the Peace River Regional District.	Discussion focused on Project introduction, anticipated regulatory process, and approach to ongoing engagement.
29-Oct-25	City of Prince George	Introductory meeting between Thesis and the City of Prince George.	Potential meeting to be set with the Regional Board to formally present the Project

7.2 Public Stakeholders

The Project is located in a geographic region that has limited interface with municipal communities. Thesis will identify members of the public and other stakeholders who may use the area for recreation, hunting, trapping, fishing, or other economic activities. This includes people who live in or have interests in potentially affected municipal communities. To date, public engagement has not taken place.
Public engagement is an integral part of the EA process and will be commenced as part of the IPD and EP review period. Thesis has been exploring the site for seven years and has engaged with stakeholders during that time. No issues around public or environmental safety have been raised by the public or stakeholders to date.

As described earlier, Thesis expects the Project to follow a substituted EA process. Before this process is approved, Thesis will begin the federal EA process by submitting the IPD and this plain language summary. If the substituted process is approved, feedback from the IAAC will be included in the EAC Application to meet provincial and federal requirements.

Once the IPD is submitted, there will be a minimum 30-day public comment period. The EAO will post the IPD on its the Environmental Assessment Office Project Information Centre (referred to as “EPIC”) website, and members of the public and stakeholders will be invited to share feedback. The EAO will respond to public comments.

Project updates and details are available at: Thesis Gold Lawyers Ranch Project.

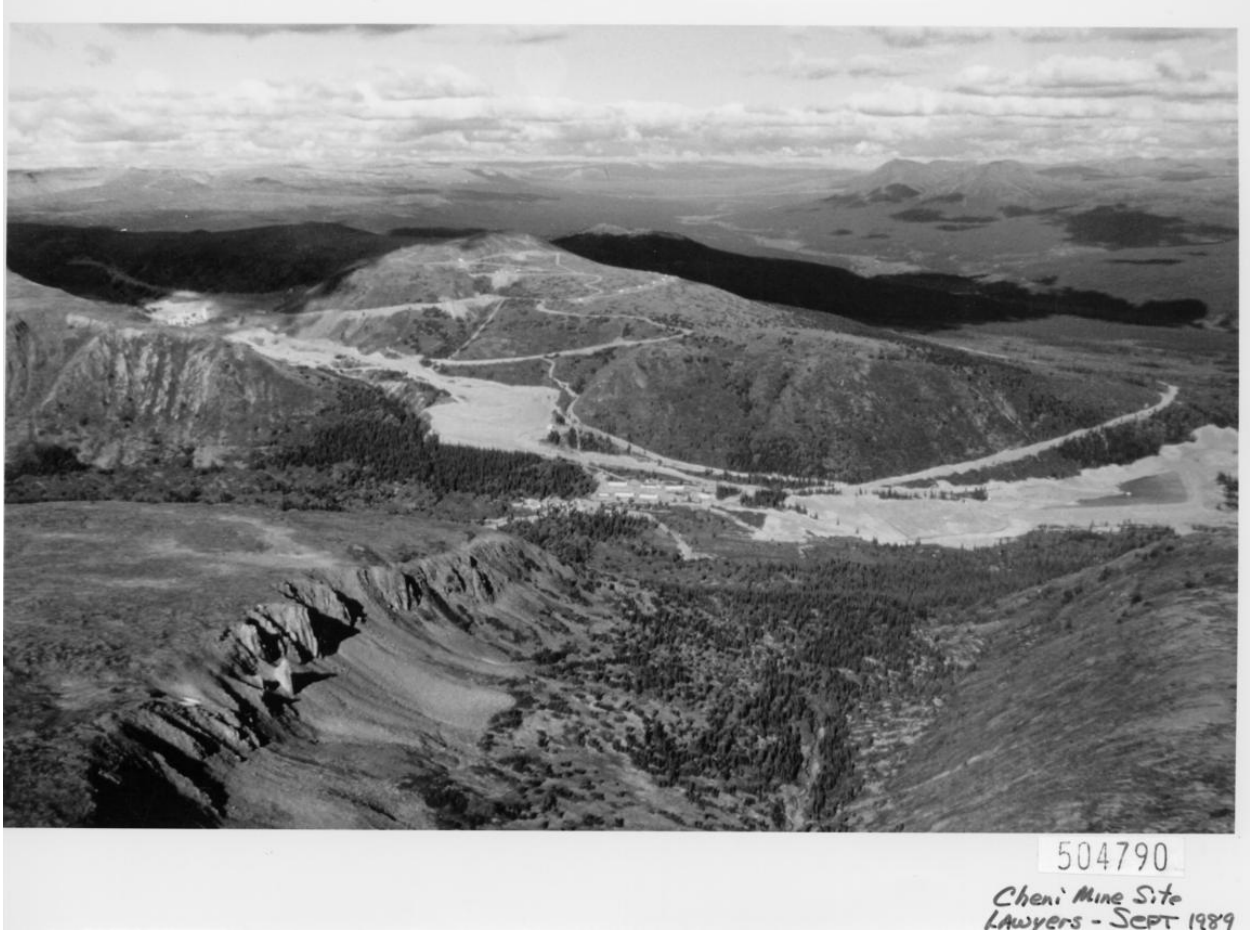
8.0 Existing Environmental Setting

This section provides a brief description of the physical, biological, human, and archaeological environment setting of the Project, a description of the existing Project site and its history, and a summary of the existing conditions program being conducted by Thesis to support the EAC Application.

8.1 Project Site

The Project is located on a land that has been previously developed that may have pollution or a risk of pollution (known as a “brownfield” site), with a long history of mineral exploration. The Project is situated on the site of the historical Cheni Mine (Photo 8-1), which was operated by Cheni Gold Mines Inc. The Cheni Mine was primarily an underground operation, with underground mining taking place at the Lawyers Site between 1989-1992, and surface mining activities at the Ranch Site in 1991 (JDS 2024). Extensive drilling took place at the Ranch Site between 1982 and 2007, across 14 gold-mineralized zones (JDS 2024).

Photo 8-1: Historical Photo of the Cheni Mine Site, September 1989



Source: View WNW. 1989. Photo - View WNW – Metsantan Valley and Toodoggone Valley – Cheni Gold Mine. September 1, 1989.

Today, the Project is in an area that is predominately characterized as active brownfield. Background studies are currently underway to further characterize the existing conditions in support of Project planning. Present day photos of the Project sites are shown in Photo 8-2 and Photo 8-3.

Photo 8-2: Present Day Photo of the Lawyers Camp on the Lawyers Site, facing West

Photo 8-3: Present Day Photo of the Ranch Camp on the Ranch Site, facing South

8.2 Project Existing Conditions Studies

Thesis has worked closely with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation since 2021 to study the existing conditions at the Lawyers and Ranch sites. These studies aim to understand the local environment and how the members of Indigenous Nations use the land today. The findings will help assess the potential effects of the Project. The work has been led by Indigenous-owned and affiliated companies, including Chu Cho Environmental (Tsay Keh Dene Nation), Sasuchan Environmental (affiliated with Takla Nation), and Kwadacha DWB Consulting (Kwadacha Nation). So far, the studies have looked at air quality, climate, noise, water, terrain, soil, vegetation, fish, wildlife, and wildlife habitat. Archaeological assessments have been carried out by In Situ Archaeology.

Thesis has agreements with Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation to support shared leadership and review of environmental studies. Indigenous Knowledge is being gathered through workshops, site visits, and review of existing information. For example, Indigenous Nations have shared that certain areas near the Project are important for exercising rights and cultural practices, that they have their own environmental data and models, and that species such as caribou and bull trout are significant in the region. They also identified historic trails and traditional use areas. Thesis will include detailed reports on current environmental conditions in the EAC Application, based on over five years of site-specific studies and Indigenous Knowledge.

8.2.1 Physical Environment

The Project is located in a mountainous region of northern BC known as the Boreal Mountains and Plateaus Ecoregion. The area includes rugged mountains, lowlands and rolling high plateaus (Demarchi 2011). The terrain around the Project is moderately steep, with elevations ranging from 1,200 to 1,900 metres above sea level (masl). The tree line is at about 1,630 masl. The land features a mix of gentle and steep slopes, surrounded by broad valley bottoms.

The climate in the region is subarctic, with cool summers and cold winters. Precipitation is fairly even throughout the year (Kottek et al. 2006). The nearest long-term weather station is about 30 km northeast of the Project. Between 1989 and 2020, the average daily temperature was 1.3 degrees Celsius (°C). January was the coldest month at -14.0°C, and July was the warmest at +11.1°C. Recorded extreme temperatures ranged from -44.6°C to +30.9°C (ENV 2024).

The Project spans two watersheds, divided by the Toodoggone River. The Lawyers Site is within the Toodoggone River watershed, which flows north, while the Ranch Site is in the Upper Stikine River watershed, which flows northwest.

8.2.2 Biophysical Feasibility Studies

The Project area includes three types of biogeoclimatic units: alpine, sub-alpine, and forested lower elevations (Chu Cho Environmental LLP & EcoLogic Consultants Ltd 2024a, 2024b, 2024c). Most of the Project is located in the alpine and sub-alpine zones. The alpine zone includes grasslands, tundra, meadows, and shrub communities, with few wetlands and many rocky areas (Chu Cho Environmental LLP & EcoLogic Consultants Ltd 2024a, 2024b, 2024c). Common alpine plants include mountain sagewort, dwarf birch, graceful mountain sedge, four-angled mountain heather, reindeer lichens, entire-leaved mountain-avens, crowberry, Altai fescue, arctic lupine, arctic willow, creeping willow, polar willow, and net-veined willow (Chu Cho Environmental LLP & EcoLogic Consultants Ltd 2024a, 2024b, 2024c). The sub-alpine zone is a transition area between alpine and forested regions. Trees here are often small and scattered, with meadows and shrubs in between. The forested lower elevation zone includes lodgepole pine and white spruce forests, along with mosses and lichens.

A search of BC's Conservation Data Centre spatial data (BC Gov 2025) identified 49 plant and lichen species with provincial conservation designation status that have the potential to occur in the Project study area. During field surveys, rare plants and lichens were discovered within the Lawyers and Ranch sites; five provincially blue-listed species and one provincially red-listed species.

As of October 2025, 20 provincially listed plant and lichen species have been found within the broader region around the Project. None of the observed species are federal Schedule 1 species under the *Species at Risk Act*. An aerial survey and ground truthing to investigate the presence of whitebark pine (*Pinus abicaulis)* was conducted in 2025 in suitable habitat. This survey did not locate any whitebark pine individuals.

The area is home to many wildlife species, including the American black bear, Canada lynx, Gray wolf, coyote, American marten, red fox, short-tailed weasel, moose, American beavers, porcupine, red squirrel, snowshoe hare, and hoary marmot (BC Gov 2025). Three species listed under the *Species at Risk Act* and provincially red-listed—grizzly bear, wolverine, and woodland caribou—have also been confirmed in the area.

Four species of common bats have been identified using the area around the Lawyers Site: eastern red bat, hoary bat, silver-haired bat, and big brown bat. The eastern red bat, hoary bat, and silver-haired bat are listed as Endangered under the *Species at Risk Act* (COSEWIC 2023). Little brown myotis (*Myotis lucifugus*), listed as endangered under *Species at Risk Act*, was also detected.

In 2022 and 2023, surveys at the Lawyers Site found several bird species that are considered at risk. These include species such as the barn swallow, short-eared owl, and rusty blackbird. Seven of the species found are officially listed as either "Special Concern" or "Threatened" under the *Species at Risk Act*. In September 2024, bird surveys also began at the Ranch Site. Observers recorded birds such as the merlin, golden eagle, common raven, and white-tailed ptarmigan.

Streams near the Project flow into the Stikine and Toodoggone Rivers and support similar fish communities. Bull trout are the only fish species present in most headwater streams (with the exception of Lawyers Creek, where only rainbow trout are present). Lower elevation streams contain a mix of fish species, including arctic grayling, lake trout, slimy sculpin, and mountain whitefish (Chu Cho Environmental LLP and Palmer 2023, 2024a, 2024b).

Bull trout are listed as “Special Concern” by Canada’s Committee on the Status of Endangered Wildlife (i.e., COSEWIC), and the South Coast BC population is also officially listed under the *Species at Risk Act*. This means that any activities in the area should take care to avoid harming this species or its habitat.

Table 8-1 provides a list of fish species captured in waterbodies in the vicinity of Lawyers and Ranch sites and identifies if these waterbodies have the potential to interact with the proposed Project infrastructure.

Table 8-1: Fish Capture Results for Waterbodies Associated with the Project

Basin	Waterbody Name	Potential interactions with Project Infrastructure (Yes/No)	Fish Species Present
Stikine River	Moyez Creek	No	Bull Trout, Arctic Grayling, Mountain Whitefish, Longnose Sucker and Burbot (Downstream of Barrier)
Stikine River	Abesti Creek	No	Non-fish Bearing
Stikine River	Metsantan Creek	No	Bull Trout, Arctic Grayling, Mountain Whitefish, Longnose Sucker and Burbot
Stikine River	T1-Metsantan Creek	No	Bull Trout
Stikine River	Tributaries of-T1-Metsantan	Yes (open pits)	Non-fish Bearing
Finlay River	Toodoggone River	No	Arctic Grayling, Burbot, Mountain Whitefish, Lake Whitefish, Round Whitefish, Lake Trout, Largescale Sucker and Slimy Sculpin
Finlay River	Lawyers Creek	No	Bull Trout, Rainbow Trout
Finlay River	Notary Creek	No	Bull Trout, Rainbow Trout
Finlay River	Attorney Creek	Yes	Bull Trout
Finlay River	Caribou Creek	Yes (Tailings Storage Facility)	Bull Trout
Finlay River	East Creek	No	Bull Trout
Finlay River	Cliff Creek	No	Non-fish Bearing
Finlay River	Moosehorn Creek	No	Bull Trout
Finlay River	Antonie Louis Creek	No	Bull Trout
Finlay River	T1- Toodoggone River	No	Bull Trout

8.2.3 Human Environment

The closest major community to the Project by air is the Town of Smithers, located about 300 km to the south. Smithers has a population of 5,378 and serves much of northwest BC (Statistics Canada 2021). It is located along Highway 16 and the Canadian National Railway (CNR) and has a regional airport with charter flight services. About 200 km west of Smithers, by road, is the City of Terrace, a larger community with 12,017 people and frequent commercial airline connections (Statistics Canada 2021). To the east, the City of Prince George is about 370 km from Smithers and is the main hub for supplies and services in northern BC, with a population of 76,708 (Statistics Canada 2021).

The closest major centre accessible by road is the District of Mackenzie, located about 400 km southeast of the Project. Mackenzie is a forestry-based community and provides services for logging (District of Mackenzie n.d.). It also has the nearest hospital and Royal Canadian Mountain Police detachment, by road, that may support the Project. Mackenzie services the nearby Mount Milligan Copper-Gold Mine and is connected by rail to the CNR, offering access to Prince Rupert and Vancouver. The town is supported by Prince George, located 180 km to the south.

First Nation communities nearest to the Project include Kwadacha (Fort Ware) approximately 100 km to the east, Tsay Keh Dene 150 km to the southeast, Takla Landing 228 km to the south and Dease Lake, Iskut and Telegraph Creek, all part of the Tahltan Nation Territory, 201 km northwest, 168 km west and 238 km west of the Project, respectively.

Thesis will work with First Nations and communities to identify any sensitive or vulnerable economic, social, heritage, or health values that may be affected by the Project.

8.2.4 Heritage and Archaeology

The Project is located within the traditional territories of Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation. Thesis' understanding of these connections is based on feedback from the Nations, BC's Consultation Areas Spatial Tool, and findings from a commissioned ethnohistorical report. Each Nation has historical ties to the area, including ancestral connections to nearby waterways.

Thesis has collaborated with these Indigenous Nations in advancing archaeological fieldwork prior to carrying out ground-disturbing exploration activities. Fieldwork follows an Archaeological Chance Find Procedure that reflects standards provided by the Nations and is part of a broader Heritage Resources Protection Plan. Archaeological assessments have been completed for both the Ranch and Lawyers sites, and Light Detection and Ranging (i.e., LiDAR) data has been used to help identify areas with archaeological potential. Funding and opportunities are provided to support participation by representatives from Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Nation. These efforts will continue as the Project moves through the EA process, including through a formal Archaeological Overview Assessment for mine development to support the EAC Application.

9.0 Potential Project Effects

This section explores the potential direct Project interactions with the physical, biological, and human environment, and Indigenous interests. Direct effects are defined as effects that are directly linked to the potential outcome of the interaction between the Project component and/or activities and the Valued Components (VCs). The Project is not expected to result in changes to the environment on federal lands, or in a province other than BC, or outside of Canada. The Project is not expected to result in changes to interprovincial or international waters.

9.1 Project Interactions and Effects

Thesis has identified early potential interactions between the Project and the surrounding environment, including VCs such as air, water, wildlife, and cultural resources. Studies completed to date that are described in Section 8.2.2 have informed the understanding of project interactions. These VCs are commonly assessed in similar projects and will be refined through collaboration with Indigenous Nations and finalized in the BC EAO Application Information Requirements (AIR). The EA process will evaluate both positive and negative effects of the Project, and identify ways to avoid, reduce, or offset impacts.

Thesis has already taken steps to reduce the potential effects of the Project. For example, by combining the Lawyers and Ranch sites, the Project footprint was reduced by at least 11.6 ha. A caribou monitoring program was developed with Kwadacha Nation, Tsay Keh Dene Nation, and Takla Nation, including wildlife cameras to track caribou activity. A native seed and stem program was launched in 2023 to support land restoration using local plants, with Indigenous Nations helping to collect and select species. The Project is located entirely within BC and is not expected to cause effects in other provinces or across borders. It is not on federal land.

Thesis is committed to working with affected communities to identify and manage potential effects of the Project. Early concerns include air quality from dust, noise and vibration, changes to terrain, groundwater and surface water quality, and effects on fish and wildlife habitats. Cultural impacts may include changes to the safety or quality of traditional foods. The Project may also bring economic benefits to the region, such as jobs and increased local spending. Human health will be assessed using data from other VC studies.

Potential effects on Indigenous interests may include impacts to cultural heritage, traditional land use, and sites of historical or archaeological importance. These will be carefully considered throughout the EA process.

Thesis is committed to the continued identification, assessment, and mitigation of potential Project-related effects and collaborating closely with Indigenous Nations and other stakeholders most likely to be affected by the Project. A preliminary list of identified Project-related potential effects is provided in Table 9-1.

Table 9-1: Preliminary List of Potential Project Effects

Topic	Potential Project Effects
Air quality	• Changes in dust • Changes in particulate matter • Changes in air quality
Acoustics	• Changes in noise levels at site • Changes in noise levels along haul roads
Surface water	• Changes to surface water • Changes to sediment quality • Changes to stream flows
Groundwater	• Changes to groundwater quality • Changes to groundwater quantity
Soil	• Changes to soil quality • Changes to soil quantity
Landscape and Terrain	• Changes to local landscape features • Changes to topography
Vegetation	• Changes to plant species and communities of interest • Changes to wetland functions • Changes to ecosystems
Wildlife, Including Culturally Valued, Species at Risk and Migratory Birds	• Loss or alteration of wildlife habitat (direct loss and indirect loss resulting from sensory disturbance) • Changes to wildlife health • Changes to mortality risk • Changes to seasonal habitat use, including use by migratory birds and species at risk.
Fish and Fish Habitat, including Aquatic Species at Risk	• Changes to instream and riparian habitats • Changes in water flows and quality • Changes to fish health

Topic	Potential Project Effects
Social and Economic	• Changes to community wellbeing and social determinants of health • Changes in the quality and quantity of resources • Changes to access to the land • Changes to local employment and contracting opportunities • Changes to labour income • Changes to regional economy • Changes to sites of historical, archaeological, or cultural importance • Changes to community infrastructure and services resulting from regional use by the workforce and to support the Project • Changes to transportation and infrastructure.
Indigenous Nations Culture, Interests, and Rights	• Changes to community wellbeing and social determinants of health • Changes in the quality and quantity of resources including fish, wildlife, vegetation, or ecosystems of cultural value • Changes to access to the land • Changes to connection with land, culture and community, including peaceful enjoyment of the land • Changes to local employment and contracting opportunities • Changes to labour income • Changes to regional economy • Changes to physical and cultural heritage • Changes to the current use of lands and resources for traditional purposes • Changes to any structure, site, or thing that is of historical, archaeological, paleontological, or architectural significance • Changes to ability to exercise Aboriginal Rights and Title • Changes to locations of historical, archaeological, or cultural importance.

Effects on Indigenous interests are linked to potential changes to the biophysical and human environments. Each First Nation – Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation and Tahltan Nation – will be assessed in line with Section 10 of the BC EAO AIR Guidelines (July 2025), the scope of which will be advanced collaboratively, and based on engagement outcomes with the individual Nations.

9.2 Potential Cumulative Effects

Thesis will assess cumulative effects as part of the EA process. Cumulative effects are the combined impacts of past, present, and future human activities on the environment. If the Project is expected to cause lasting negative effects on any VC, those effects will be examined alongside other activities in the area that may contribute to similar impacts. This includes projects that are already operating, in the permitting process, or publicly announced.

The EA will look at how the Project's effects fit within the broader context of other developments nearby. The area and types of projects considered will be confirmed through engagement with Indigenous Nations and other stakeholders. A preliminary list of activities that may contribute to cumulative effects includes:

- Forestry operations;
- Mining projects, such as Kemess Mine;
- Use of the Sturdee airstrip;
- Commercial hunting and recreation; and
- Infrastructure, such as roads and transmission lines related to forestry and mining.

10.0 Malfunctions and Accidents

Unplanned events may arise during any Project phase, and may result in effects to the Environment, Economic, Social, Cultural, or Health values and Indigenous Interests. The EAC Application will assess potential risks of malfunctions and accidents and identify risk management measures and other potential mitigation measures.

Potential malfunctions or accidents associated with the Project that may occur include:

- Environmental incidents (including spills or the release of contaminants into the environment);
- Slope failure of WRSFs;
- TMF failure;
- Accidents relating to the use of explosives;
- Vehicle incidents; and
- Fires.

Further scoping of the assessment of malfunctions and accidents will be identified with the development and engagement on the AIR. As the Project advances, Thesis intends to engage with First Nations, the Technical Advisory Committee, and regulators to identify key interests and opportunities for engagement on this topic.

Thesis will put safety measures in place to reduce the risk of accidents or malfunctions during construction and operation of the Project. These measures will follow industry best practices and standards. Outreach and communication protocols will be put into place to inform Indigenous Nations, local governments, and the public of the risks associated with the Project and the controls and mitigations that have been developed to alleviate these risks. It is anticipated that dialogue and engagement with Indigenous groups, local governments, and the public will occur on this topic through the virtual engagement sessions and future co-design workshops, the EA, and the subsequent permitting processes.

11.0 Effects of the Environment on the Project

Environmental factors such as climate change, wildfires, and other natural hazards may affect the Project site facilities and operation. These potential effects could include short-term impacts to site access, infrastructure and operations, and personnel health and safety. Project planning and design considers these potential environmental factors to mitigate adverse effects and reduce the risk to the Project through design measures, available technologies, the development of environmental management plans, and the use of best-known practices. Effects of the environment on the Project will be explored further throughout the EA process, Project design, and future engagement efforts.

The Project may be affected by the following natural hazards:

- Seismic events;
- Potential extreme short-term weather and weather-related events such as:
  - Extreme precipitation;
  - Flooding;
  - Drought (e.g., water availability, power supply risk);
  - Extreme temperature fluctuation; and
  - Extreme heat (e.g., forest fires risk) or cold.

The Project may be affected by long-term trends of climate change, which could have adverse effects on operations, health and safety, infrastructure, and water supply and management. Examples of possible climate change trends include changing temperature and precipitation. Changing temperature, precipitation, and associated potential drought conditions could lead to an increased potential for and intensity of wildfires.

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