

sherritt



**2020 Tailings
Management Report**

Sherritt’s goal is that each joint venture operates and maintains its tailings management facilities in accordance with global best practices for safety. We continually review our facilities and procedures and are committed to pursuing the highest standards at our operations.

Sherritt’s tailings management facilities (TMFs) are located at the Moa Nickel Site and are a part of our Moa Joint Venture (JV). The Moa Nickel Site is operated by the Moa JV’s management, reporting to the Moa JV Board of Directors. The Moa JV is a 50/50 joint venture between Sherritt and a Cuban government agency. Accordingly, while the following reflects Sherritt’s approach to tailings management, Sherritt by itself cannot unilaterally control outcomes in relation to tailings management at the Moa Nickel Site. Sherritt remains committed to working with its Moa JV partner to advocate that global best practices are followed.

1. Governance and Assurance

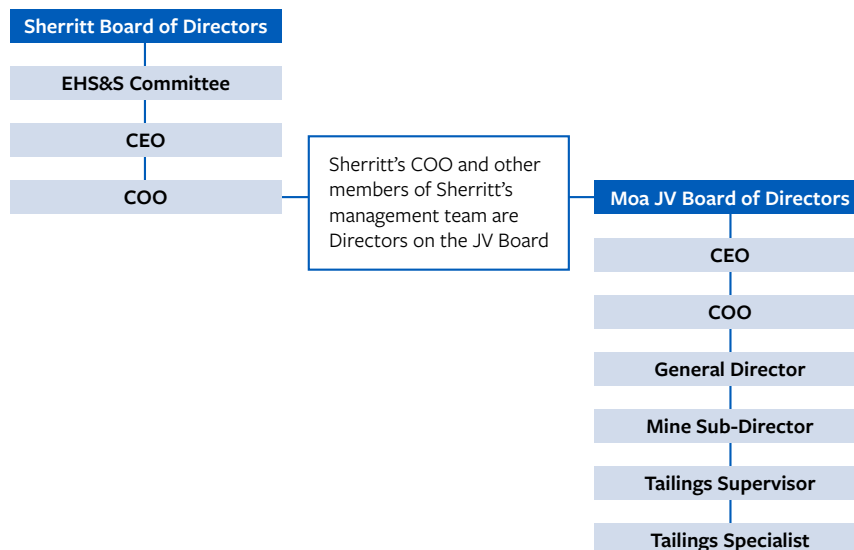
Accountability and Resourcing

The Sherritt Board of Directors (the Board), through its Environment, Health, Safety and Sustainability Committee (EHS&S Committee), oversees implementation of our Sustainability Framework and Tailings Standard, including policies, systems, performance and auditing functions. Assurance activities associated with tailings management are conducted through the Sherritt Board Audit Committee. In 2021, changes to the committee structures are being proposed to consolidate several committees, to more clearly include review of environmental, social and governance (ESG) matters including tailings, and to address future assurance of tailings disclosures.

The following senior leaders are involved in the management of tailings:

- The Executive Vice President and Chief Operating Officer reports directly to the President and Chief Executive Officer and is responsible for sustainability, health and safety, environment, community, and Indigenous affairs, including tailings management.
- The Moa JV Chief Operating Officer chairs the regular internal tailings review meetings and reports directly to the Executive Vice President and Chief Operating Officer. Members of the internal tailings review team include members of the Moa Nickel Site senior management team and tailings management subject matter experts from the Moa JV operations. The group actions recommendations from the Independent Tailings Review Board (ITRB) and other audits and provides updates on operations, maintenance, monitoring and emergencies as applicable.

Tailings Management Structure



The mandate of Sherritt's EHS&S Committee, which can be found [here](#), includes the following:

- (k) Ensure adequate and effective tailings management systems are in place and utilized, ensure compliance is monitored, (including through external verification on such periodic basis as the Committee considers to be appropriate), and offer advice and recommendations to the Board in connection herewith.

The organization employs an independent Engineer of Record (EoR) to provide oversight and review of TMF design, construction and operation. The EoR for the Moa Nickel Site TMFs is Knight Piésold, one of the world's leading consulting firms.

The Moa Nickel Site also has an Independent Tailings Review Board made up of independent experts who conduct annual third-party reviews of design, operation, surveillance and maintenance.

Risk Management

Dam failure is the greatest risk for our TMFs, located at the Moa Nickel Site and part of our Moa JV. Sherritt's dam safety assurance program assesses the Moa JV's tailings against international leading practice.

Sherritt's operations are required to assess natural phenomena such as extreme flooding and seismic events, as well as operational criteria, and incorporate these factors into their TMF designs.

There are at least five levels of governance and assurance that Sherritt advocates its operations undertake on TMFs:

1. **Regular surveillance** – Operations are expected to monitor their TMFs on an ongoing basis using piezometers, inclinometers, pressure gauges, remote sensing and other technologies to monitor tailings dams, abutments, natural slopes and water levels. The results are assessed by the management team of the operation.
2. **Annual dam safety inspections (DSI)** – Formal dam safety inspections are conducted annually by an external EoR, Knight Piésold, for all operations. A DSI evaluates and observes potential deficiencies in a TMF's current and past condition, performance and operation.
3. **Independent Tailings Review Boards** – The ITRB, comprising two senior subject matter specialists, meets at least once a year, depending upon the nature of the facility and the issues being considered, to conduct a third-party review of design, operation, surveillance and maintenance of our TMFs. The results from the ITRB assessments are reported to the Moa JV management and Board of Directors, Sherritt's senior management and the EHS&S Committee of Sherritt's Board of Directors. Recommendations are tracked to completion by management internal reviews.
4. **Internal reviews** – Sherritt's COO conducts internal management reviews of Sherritt's tailings facilities on a regular basis. Summaries are reported to the EHS&S Committee of Sherritt's Board of Directors.
5. **Staff inspections** – Tailings management facilities are inspected by trained operators and expert technical staff as frequently as several times daily, with formal staff inspections occurring at the Moa Nickel Site at least once a month.

The different levels of assurance are undertaken on the basis of national regulations, as well as, where appropriate, criteria aligned with international guidelines from the [Canadian Dam Association](#) and the [International Commission on Large Dams](#).

In addition, where appropriate, the Moa Nickel Site conducts periodic dam safety reviews, which include reviewing maintenance, surveillance and monitoring, failure impact assessments, emergency management procedures, public safety and environmental management. The results are shared with the operation's management and reviewed as part of the dam safety audits.

Tailings Management Standard

Sherritt has had an internal tailings management standard in place since 2018. Management at the Moa Nickel Site has adopted this standard and is in the process of implementing it. The standard aligns with the Mining Association of Canada's Towards Sustainable Mining [Tailings Management Protocol](#), and supports Sherritt's goal of designing, constructing, operating, decommissioning and closing tailings facilities in such a manner that all structures are stable, all solids and water are managed within designated areas, and all management practices conform with regulatory requirements, sound engineering principles and good practice. Sherritt continues to review and evaluate monitoring systems and risk assessments to ensure the approach is robust and current.

Engaging with Communities

Sherritt advocates that its operations undertake proactive stakeholder and community engagement across a broad range of operational topics, including TMFs where appropriate.

We require that our operations, and those of our joint ventures, develop and maintain emergency preparedness and response plans, and communicate these plans with relevant stakeholders. Where appropriate, operations may also engage with local and regional emergency response services in scenario planning and practice exercises.

In Cuba, engagement with communities with respect to tailings management is conducted by Sherritt's joint venture partners. This can include, but is not limited to, grievance resolution, risk management, and emergency response.

Continuous Improvement

Sherritt is committed to continually reviewing its joint venture facilities and procedures to maintain the highest standard of dam safety at its operations. Sherritt also works in partnership with local, national and international organizations to support improvements in tailings management across the industry, including the Mining Association of Canada (MAC). With the assistance of MAC, Sherritt is implementing the Towards Sustainable Mining (TSM) program, including the Tailings Management Protocol, in wholly owned operations and is working with its partners to implement it in the Moa JV. Through MAC and updates to the TSM Tailings Management Protocol, Sherritt plans to align with the new [Global Industry Standard on Tailings Management](#).

2. Tailings Management Facilities

There are several TMFs at Sherritt's joint venture operation in Cuba – the Moa Nickel Site. The site is operated by the Joint Venture's management, reporting to the joint venture Board of Directors. A geotechnical engineer is employed to provide oversight of design, construction and operation of the tailings facilities. Third-party engineering firms are utilized in the design and monitoring of tailings facilities. The design and operation of existing facilities meet or exceed all applicable regulatory requirements. There are no tailings produced at the Fort Site or at the Oil & Gas and Power (OGP) sites.

At the Moa Nickel Site in Cuba, [upstream and downstream](#) designs have been used throughout the mine life. Stability is monitored as per the operating practices manual. Based on internal and third-party reviews of structural integrity and management systems, the facilities are operating to design specifications and are stable.

Sherritt works with its Cuban joint venture partner, the General Nickel Company S.A. of Cuba (GNC), to continually improve tailings management and achieve alignment with international best practices. As a member of the Mining Association of Canada, Sherritt has influenced its partner to begin implementing Sherritt's Tailings Management Standard, which is aligned with MAC's Tailings Management Protocol, at the Moa Nickel Site in Cuba, and to apply Canadian Dam Association criteria.

Sherritt and its joint venture partner also began investigating options for tailings management so that we can continue to support future mining operations. Throughout this process, Sherritt will strive to minimize environmental impacts and meet international good practice in tailings management. A rehabilitation plan has also been developed at the Moa Nickel Site and is underway in a section that is no longer active.

3. Performance

2020 Highlights

| Indicator | 2020 |
|--|------|
| Significant tailings-related environmental incidents | 0 |
| Percentage of TMFs with completed annual evaluations performed by a third-party Engineer of Record | 100% |
| Percentage of TMFs reviewed by Independent Tailings Review Board | 100% |

| TMF | Annual Dam Safety Inspection ¹ | Review by ITRB ² | Comment |
|------------------------------|---|-----------------------------|---------------------|
| Acid Leach Tailings Facility | Yes | Yes | Next review in 2021 |
| North Extension | Yes | Yes | Next review in 2021 |
| Area 22 | Yes | Yes | Next review in 2021 |

¹ The Engineer of Record performs a detailed examination of the facility, its related infrastructure and the records relating to these, to identify any conditions or changes that might contribute to, or signal the potential for, a compromise to the safety and reliability of the structure.

² Review by a team of independent subject matter experts who review the facility design approach, surveillance results and a site's overall approach to tailings.

The TMFs at the Moa Nickel Site are reviewed regularly, both internally and by third parties, for structural integrity and the effectiveness of management systems, and all recommendations are reviewed by Moa Nickel Site management and plans are developed to address them. There have been no incidents at the tailings management facilities. Sherritt management continues to work with its joint venture partners to ensure employees have the skills required to manage the facilities effectively.

In 2020, the Independent Tailings Review Board recommended the following:

1. North Extension: Implement stabilizing measures in critical sections of the North Extension and perform an assessment of failure risks;
2. Area 22, Stage 3: Provide the final configuration and staged construction plan to the ITRB for review; and
3. Future tailings storage: Make a decision on the preferred site promptly and proceed with feasibility design and planning.

Moa Nickel Site management has started to action the recommendations, all of which are targeted for completion in 2021.

In 2020, the Moa Nickel Site also updated its self-assessment against MAC's Towards Sustainable Mining Tailings Management Protocol and assessed itself at Level B. This means that some actions are not consistent or documented and also that systems/processes are planned and being developed. The self-assessment identified some management system gaps, including the need to complete an external evaluation of annual tailings management reviews, the Operations Maintenance and Surveillance manual, and Emergency Preparedness Plan.

Long-Term Tailings Disposal

Subsequent to the end of 2020, Los Lirios was selected by management as the preferred long-term storage option in early 2021. In addition, conceptual studies of future tailings disposal sites were updated by Knight Piésold. As shown in Figure 1 below, a proposed sequence of tailings management projects has been developed that will allow tailings disposal as follows:

- North Extension – 2021 to 2022
- Area 22, Stage 3 – 2022 to 2025
- Los Lirios – 2024, for up to 15 years

Figure 1: Proposed Sequence of Tailings Management Facility Development at the Moa Nickel Site

| Project | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030-2039 |
|------------------------|------|-----------|--------------|--------------|--------------------------|--------------|---------|------|------|------|------|-----------|
| ALTF Closure | | Closure | | | | | | | | | | |
| North Extension | | Operation | | | Closure or Future Stages | | | | | | | |
| Area 22, Stage 3 | | | Phase 1 | Phase 2 | Phase 3 | | | | | | | |
| | | | Construction | Construction | Construction | | | | | | | |
| | | | Operation | | | | Closure | | | | | |
| Long Term - Los Lirios | | | | | | Construction | | | | | | |
| | | | | | | Operation | | | | | | |

Acid Leach Tailings Facility (ALTF): Closure and stabilization work continued in 2020. Monitoring activities are ongoing and informing the closure plans.

North Extension: As the ALTF approached capacity, the Moa JV retained Knight Piésold, to design an extension that would ensure continued capacity to store tailings. In 2020, operations, staged construction, and additional stability analyses on the North Extension occurred.

Area 22: Detailed design and permitting of this multi-phased short-term tailings solution were completed in 2020. Construction has begun, with completion of phase 1 expected by December 2021. Additional analyses have resulted in an increase to the size of the Area 22 catchment and an extension to the length of the estimated storage capacity from two years to three and a half years.

Los Lirios: Permitting and studies are underway for this long-term solution.

4. Church of England Disclosure

Sherritt is committed to being open and transparent with communities of interest and other stakeholders regarding the construction and management of the TMFs operated by the Moa JV in Cuba. Although Sherritt did not receive a letter from the Church of England requesting greater disclosure on its TMFs, Sherritt understands that this is good management practice.

Below are tables that contain disclosure information requested by the Church of England, as applied to Sherritt's joint venture's TMFs.

Table 1. Facility #1: Acid Leach Tailings Facility

| Disclosure | Instructions | 2020 Response | 2019 Response | Comments |
|---|--|--|--|---|
| 1. "Tailings Dam" identifier | Please identify every tailings storage facility and identify if there are multiple dams (saddle or secondary dams) within that facility. Please provide details of these within question 20. | Acid Leach Tailings Facility North Extension: Extension of ALTF Area 22, Stage 3: South Extension of ALTF | Acid Leach Tailings Facility North Extension: Extension of ALTF Area 22, Stage 3: South Extension of ALTF | |
| 2. Location | Please provide longitude/latitude coordinates. | 70.0000° E 22.1000° N | 70.0000° E 22.1000° N | |
| 3. Ownership | Please specify: Owned and Operated, Subsidiary, JV, NOJV, as of March 2019 | Moa JV | Moa JV | |
| 4. Status | Please specify: Active, Inactive/Care and Maintenance (C&M), Closed, etc. We take "closed" to mean: a closure plan was developed and approved by the relevant local government agency, and key stakeholders were involved in its development; a closed facility means the noted approved closure plan was fully implemented or the closure plan is in the process of being implemented. A facility that is inactive or under C&M is not considered closed until such time as a closure plan has been implemented. | Acid Leach Tailings Facility: Inactive/C&M North Extension: Operational Area 22, Stage 3: Construction Project (ongoing) | Acid Leach Tailings Facility: Inactive/C&M North Extension: Operational Area 22, Stage 3: Construction Project (ongoing) | Closure plan of ALTF is on hold pending further analysis of water levels. |
| 5. Date of initial operation | | 1979 | 1979 | |
| 6. Is the dam currently operated or closed, as per currently approved design? | Yes/No. If "No", more information can be provided in the answer to question 20. | No | No | The ALTF was operated as per the design and will be closed according to the design. |
| 7. Raising method | Note: Upstream, Centreline, Modified Centreline, Downstream, Landform, Other | Upstream | Upstream | |
| 8. Current maximum height | Note: Please disclose in metres. | 40 m | 40 m | |
| 9. Current tailings storage impoundment volume | m ³ as of March 2019 | 53,700,000 m ³ | 53,700,000 m ³ | |
| 10. Tailings storage impoundment volume in five years' time | m ³ as planned for January 2024 | 0 | 0 | |
| 11. Most recent independent expert review | (Date) For this question, we take "independent" to mean a suitably qualified individual or team, external to the operation, that does not direct the design or construction work for that facility. | December 2020 | December 2019 | Annual independent review. It was performed online due to COVID-19 restrictions. |

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| Disclosure | Instructions | 2020 Response | 2019 Response | Comments |
|--|--|---|---|--|
| 12. Do you have full and complete relevant engineering records, including design, construction, operation, maintenance and/or closure? | (Yes or No) We take the word “relevant” here to mean that you have all necessary documents to make an informed and substantiated decision on the safety of the dam, be it an old facility, an acquisition, or a legacy site. More information can be provided in your answer to question 20. | Yes | Yes | All documents are stored on site. |
| 13. What is your hazard categorization of this facility, based on consequence of failure? | | Extreme | Extreme | Change in consequence categorization recommended by the ITRB in 2019. |
| 14. What guidelines do you follow for the classification system? | | CDA Hazard Potential Classification | CDA Hazard Potential Classification | |
| 15. Has the facility, at any point in its history, failed to be confirmed or certified as stable, or experienced notable stability concerns, as identified by an Independent Engineer (even if later certified as stable by the same or a different firm)? | (Yes or No) We note that this will depend on factors, including local legislation, that are not necessarily tied to best practice. As such, and because remedial action may have been taken, a “Yes” answer may not indicate heightened risk. Stability concerns might include toe seepage, dam movement, overtopping, spillway failure, piping, etc. If “Yes”, have appropriately designed and reviewed mitigation actions been implemented? We also note that this question does not bear upon the appropriateness of the criteria, but rather the stewardship levels of the facility or the dam. Additional comments/information may be supplied in your answer to question 20. | Yes. The facility experienced a slump along one of its embankments in January 2014. No impact to population or to the environment was incurred as a consequence of the slump. Corrective actions were put in place, additional buttressing and drains were installed. Engineers of Record provided the remediation designs and were on site for the duration of the work. There have been no other incidents on record before or since. | Yes. The facility experienced a slump along one of its embankments in January 2014. No impact to population or to the environment was incurred as a consequence of the slump. Corrective actions were put in place, additional buttressing and drains were installed. Engineers of Record provided the remediation designs and were on site for the duration of the work. There have been no other incidents on record before or since. | |
| 16. Do you have internal/ in-house engineering specialist oversight of this facility? Or do you have an external engineering support for this purpose? | Note: Answers may be “Both”. | Both | Both | The Moa Nickel Site has a tailings specialist engineer expat on site full time and also contracts the Engineer of Record (Knight Piésold) to complete a full review of the facility every six weeks. |
| 17. Has a formal analysis of the downstream impact on communities, ecosystems and critical infrastructure in the event of a catastrophic failure been undertaken, and to reflect final conditions? If so, when did the assessment take place? | Note: Please answer “Yes” or “No”, and if “Yes”, provide a date. | Yes. The Hazard, Vulnerability and Risks Study was reviewed and updated in 2019. | Yes. The Hazard, Vulnerability and Risks Study was reviewed and updated in 2019. | |

| Disclosure | Instructions | 2020 Response | 2019 Response | Comments |
|---|--|--|--|----------|
| 18. Is there: a) a closure plan in place for this dam? b) does it include long-term monitoring? | Please answer both parts of this question (e.g, “Yes” and “Yes”). | a) Yes b) Yes | a) Yes b) Yes | |
| 19. Have you assessed, or do you plan to assess, your tailings facilities against the impact of more regular extreme weather events as a result of climate change (e.g, over the next two years)? | | Yes. These considerations were included in the review and update of the Hazard, Vulnerability and Risks Study in 2019. | Yes. These considerations were included in the review and update of the Hazard, Vulnerability and Risks Study in 2019. | |
| 20. Any other relevant information and supporting documentation. Please state if you have omitted any other exposure to tailings facilities through any joint ventures you may have. | Note: This may include links to annual report disclosures, further information in the public domain, guidelines or reports, etc. | No | No | |

Table 2. Facility #2: North Extension

| Disclosure | Instructions | 2020 Response | 2019 Response | Comments |
|---|--|--------------------------|--------------------------|---|
| 1. “Tailings Dam” identifier | Please identify every tailings storage facility and identify if there are multiple dams (saddle or secondary dams) within that facility. Please provide details of these within question 20. | North Extension | North Extension | |
| 2. Location | Please provide longitude/latitude coordinates. | 70.1000° E 22.2000° N | 70.1000° E 22.2000° N | |
| 3. Ownership | Please specify: Owned and Operated, Subsidiary, JV, NOJV, as of March 2019 | Moa JV | Moa JV | |
| 4. Status | Please specify: Active, Inactive/Care and Maintenance (C&M), Closed, etc. We take “closed” to mean: a closure plan was developed and approved by the relevant local government agency, and key stakeholders were involved in its development; a closed facility means the noted approved closure plan was fully implemented or the closure plan is in the process of being implemented. A facility that is inactive or under C&M is not considered closed until such time as a closure plan has been implemented. | Active | Active | Will be active until end of 2022. |
| 5. Date of initial operation | | 2017 | 2017 | |
| 6. Is the dam currently operated or closed, as per currently approved design? | Yes/No. If “No”, more information can be provided in the answer to question 20. | Yes | Yes | The North Extension is being operated as per the design and specifications. |

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| Disclosure | Instructions | 2020 Response | 2019 Response | Comments |
|--|--|-------------------------------------|-------------------------------------|--|
| 7. Raising method | Note: Upstream, Centreline, Modified Centreline, Downstream, Landform, Other | Upstream | Upstream | |
| 8. Current maximum height | Note: Please disclose in metres. | 14 m | 11 m | |
| 9. Current tailings storage impoundment volume | m ³ as of March 2019 | 6,950,000 m ³ | 4,230,000 m ³ | |
| 10. Tailings storage impoundment volume in five years' time | m ³ as planned for January 2024 | 10,580,000 m ³ | 10,580,000 m ³ | Operations to cease at end of 2022. |
| 11. Most recent independent expert review | (Date) For this question, we take "independent" to mean a suitably qualified individual or team, external to the operation, that does not direct the design or construction work for that facility. | December 2020 | December 2019 | Annual independent review. It was performed online due to COVID-19 restrictions. |
| 12. Do you have full and complete relevant engineering records, including design, construction, operation, maintenance and/or closure? | (Yes or No) We take the word "relevant" here to mean that you have all necessary documents to make an informed and substantiated decision on the safety of the dam, be it an old facility, or an acquisition, or a legacy site. More information can be provided in your answer to question 20. | Yes | Yes | All documents are stored on site |
| 13. What is your hazard categorization of this facility, based on consequence of failure? | | Extreme | Extreme | Change in consequence categorization recommended by the ITRB in 2019. |
| 14. What guidelines do you follow for the classification system? | | CDA Hazard Potential Classification | CDA Hazard Potential Classification | |
| 15. Has the facility, at any point in its history, failed to be confirmed or certified as stable, or experienced notable stability concerns, as identified by an Independent Engineer (even if later certified as stable by the same or a different firm)? | (Yes or No) We note that this will depend on factors, including local legislation, that are not necessarily tied to best practice. As such, and because remedial action may have been taken, a "Yes" answer may not indicate heightened risk. Stability concerns might include toe seepage, dam movement, overtopping, spillway failure, piping, etc. If "Yes", have appropriately designed and reviewed mitigation actions been implemented? We also note that this question does not bear upon the appropriateness of the criteria, but rather the stewardship levels of the facility or the dam. Additional comments/information may be supplied in your answer to question 20. | No | No | |

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| Disclosure | Instructions | 2020 Response | 2019 Response | Comments |
|---|--|---------------|---------------|---|
| 16. Do you have internal/ in-house engineering specialist oversight of this facility? Or do you have external engineering support for this purpose? | Note: Answers may be “Both”. | Both | Both | The Moa Nickel Site has a tailings specialist engineer expat on site full time and also contracts the Engineer of Record (EIPH Camaguey) to complete a full review of the facility every 15 days. |
| 17. Has a formal analysis of the downstream impact on communities, ecosystems and critical infrastructure in the event of a catastrophic failure been undertaken, and to reflect final conditions? If so, when did the assessment take place? | Note: Please answer “Yes” or “No”, and if “Yes”, provide a date. | No | No | The EIPH will complete this by the end of 2020. No communities or infrastructure have been identified downstream of the facility. |
| 18. Is there: a) a closure plan in place for this dam? b) does it include long-term monitoring? | Please answer both parts of this question (e.g, “Yes” and “Yes”). | No | No | A closure plan will be completed in 2021. |
| 19. Have you assessed, or do you plan to assess, your tailings facilities against the impact of more regular extreme weather events as a result of climate change (e.g, over the next two years)? | | Yes | Yes | |
| 20. Any other relevant information and supporting documentation. Please state if you have omitted any other exposure to tailings facilities through any joint ventures you may have. | Note: This may include links to annual report disclosures, further information in the public domain, guidelines or reports, etc. | No | No | |

Table 3. Facility #3: Area 22

| Disclosure | Instructions | 2020 Response | 2019 Response | Comments |
|---|--|---|---|--|
| 1. "Tailings Dam" identifier | Please identify every tailings storage facility and identify if there are multiple dams (saddle or secondary dams) within that facility. Please provide details of these within question 20. | Area 22 | Area 22 | |
| 2. Location | Please provide longitude/latitude coordinates. | 70.0500° E 22.0500° N | 70.0500° E 22.0500° N | |
| 3. Ownership | Please specify: Owned and Operated, Subsidiary, JV, NOJV, as of March 2019 | Moa JV | Moa JV | |
| 4. Status | Please specify: Active, Inactive/Care and Maintenance (C&M), Closed, etc. We take "closed" to mean: a closure plan was developed and approved by the relevant local government agency, and key stakeholders were involved in its development; a closed facility means the noted approved closure plan was fully implemented or the closure plan is in the process of being implemented. A facility that is inactive or under C&M is not considered closed until such time as a closure plan has been implemented. | Inactive/C&M | Inactive/C&M | Inactive while third raise is designed and constructed. |
| 5. Date of initial operation | | 2016 | 2016 | |
| 6. Is the dam currently operated or closed, as per currently approved design? | Yes/No. If "No", more information can be provided in the answer to question 20. | No | No | Area 22, Stage 2 is inactive and construction of Stage 3 continues. |
| 7. Raising method | Note: Upstream, Centreline, Modified Centreline, Downstream, Landform, Other | Centreline | Centreline | |
| 8. Current maximum height | Note: Please disclose in metres. | 15 m | 15 m | |
| 9. Current tailings storage impoundment volume | m ³ as of March 2019 | 4,680,000 m ³ | 4,680,000 m ³ | |
| 10. Tailings storage impoundment volume in five years' time | m ³ as planned for January 2024 | 4.8M m ³ total for two years of tailings storage | 4.8M m ³ total for two years of tailings storage | The final capacity will be updated. A two-phase design is being conceptualized to ensure tailings storage capacity at the end of 2021. |
| 11. Most recent independent expert review | (Date) For this question, we take "independent" to mean a suitably qualified individual or team, external to the operation, that does not direct the design or construction work for that facility. | December 2020 | December 2019 | Annual independent review. It was performed online due to COVID-19 restrictions. |

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| Disclosure | Instructions | 2020 Response | 2019 Response | Comments |
|--|--|--|--|---|
| 12. Do you have full and complete relevant engineering records, including design, construction, operation, maintenance and/or closure? | (Yes or No) We take the word “relevant” here to mean that you have all necessary documents to make an informed and substantiated decision on the safety of the dam, be it an old facility, or an acquisition, or a legacy site. More information can be provided in your answer to question 20. | Yes | Yes | All documents are stored on site. |
| 13. What is your hazard categorization of this facility, based on consequence of failure? | | Extreme | Extreme | Change in consequence categorization recommended by the ITRB in 2019. Construction activities are underway to address this. |
| 14. What guidelines do you follow for the classification system? | | CDA Hazard Potential Classification | CDA Hazard Potential Classification | |
| 15. Has the facility, at any point in its history, failed to be confirmed or certified as stable, or experienced notable stability concerns, as identified by an Independent Engineer (even if later certified as stable by the same or a different firm)? | (Yes or No) We note that this will depend on factors, including local legislation, that are not necessarily tied to best practice. As such, and because remedial action may have been taken, a “Yes” answer may not indicate heightened risk. Stability concerns might include toe seepage, dam movement, overtopping, spillway failure, piping, etc. If “Yes”, have appropriately designed and reviewed mitigation actions been implemented? We also note that this question does not bear upon the appropriateness of the criteria, but rather the stewardship levels of the facility or the dam. Additional comments/information may be supplied in your answer to question 20. | No | No | |
| 16. Do you have internal/in-house engineering specialist oversight of this facility? Or do you have external engineering support for this purpose? | Note: Answers may be “Both”. | Both | Both | The Moa Nickel Site has a tailings specialist engineer expat on site full time and also contracts the Engineer of Record (EIPH Camaguey) to complete a full review of the facility every 15 days. |
| 17. Has a formal analysis of the downstream impact on communities, ecosystems and critical infrastructure in the event of a catastrophic failure been undertaken, and to reflect final conditions? If so, when did the assessment take place? | Note: Please answer “Yes” or “No”, and if “Yes”, provide a date. | Yes. A Hazard, Vulnerability and Risks Study was commenced in 2019 and finalized and approved in 2020. | Yes. A Hazard, Vulnerability and Risks Study was commenced in 2019 and finalized and approved in 2020. | |

| Disclosure | Instructions | 2020 Response | 2019 Response | Comments |
|---|--|--|--|--|
| 18. Is there: a) a closure plan in place for this dam? b) does it include long-term monitoring? | Please answer both parts of this question (e.g, “Yes” and “Yes”). | No | No | |
| 19. Have you assessed, or do you plan to assess, your tailings facilities against the impact of more regular extreme weather events as a result of climate change (e.g, over the next two years)? | | Yes. The current Hazard, Vulnerability and Risks Study was commenced in 2019 and finalized and approved in 2020. | Yes. The current Hazard, Vulnerability and Risks Study was commenced in 2019 and finalized and approved in 2020. | The Study includes designs considering extreme weather events (such as rainfall and seismic failures). |
| 20. Any other relevant information and supporting documentation. Please state if you have omitted any other exposure to tailings facilities through any joint ventures you may have. | Note: This may include links to annual report disclosures, further information in the public domain, guidelines or reports, etc. | | | |