



May 20, 2026

Via email

JoAnne Deneron
Chairperson
Mackenzie Valley Review Board
200 Scotia Centre
Box 938, 5102-50th Ave
Yellowknife, NT X1A 2N7

Canadian Zinc’s Prairie Creek All Season Road EA 1415-01 Measure 15-2: Annual Reporting from the Developer

Canadian Zinc (CZN), a subsidiary of Honey Badger Silver Inc., is pleased to provide to you this EA Annual Report in fulfillment of Measure 15-2 from Environmental Assessment (EA) 1415-01 (Prairie Creek All Season Road). For easy reference, Measure 15-2 is shown below. This EA report is inclusive of the timeframe from January 1, 2025 up to and including December 31, 2025. This timeframe will be referred to as the “reporting period” throughout. Note that because the Project has only advanced to Phase 1 (Construction of the Winter Road) there is nothing to report on that could be considered adaptive management being undertaken to implement the measure; at this early stage CZN is following the measure(s) and the enclosed reporting reflects this.

<p>15. Follow-up</p>	<p>Measure 15-2: Annual reporting from the developer</p> <p>In order to demonstrate how measures are being implemented and to evaluate the effectiveness of the developer’s efforts to prevent or minimize impacts on the environment, the developer will, throughout all phases of the development, prepare an annual Report on the Implementation of Measures. The Report will address the measures that the developer is responsible for and will:</p> <ul style="list-style-type: none"> i. Describe the actions, including actions implemented through adaptive management, being undertaken to implement the measures. ii. Evaluate how effective the implementation actions are in controlling, reducing, or eliminating the impact (considering the results of monitoring programs and adaptive management frameworks). Where applicable, provide references to further information contained in other management plans or monitoring reports. <p>The developer will provide a copy of this annual report to the Review Board by June 30 of each year, following the commencement of construction of the Project.</p> <p>The developer will also report in person annually, in a culturally appropriate way, to Nahanni Butte Dene Band, Liidlii Kué First Nation, and Dehcho First Nations.</p>
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PROJECT STATUS

Following the release of the [Report of Environmental Assessment and Reasons for Decision](#) (September 2017) and ministerial sign off, CZN underwent the permitting and licencing process receiving the necessary Land Use Permits and Water Licences for the Project (or the All Season Road) in 2019.

CZN began Construction of the Phase 1 Winer Road (WR) on October 15, 2022 with activities continuing throughout the winter season of 2022/23. The Phase 1 WR has since been deactivated. Post-construction monitoring is ongoing and will continue as per the authorizations, approved Phase 1 management plans, and deactivation plans until the start of Phase 2¹ (Construction of the All Season Road).

In 2025, there were no Construction² related activities along the route. Activities that did occur were:

- Post-construction monitoring in accordance with the approved management plans;
- Water quality sampling as per the Water Licence Surveillance Network Program;
- Use of the Met One Instruments Environmental Beta Attenuation Mass Monitor (E-BAM) PM2.5 air monitor and dustfall canisters; and
- Deployment of bird song recorders, a ground based lambing survey for further collection of baseline data, and bat habitat surveys.

Currently, CZN continues to work on an internal review of the ASR design so as to prepare it for presentation and acceptance by the Independent Technical Review Panel, an update to the Feasibility Study, the approval of Phase 2 management plans, obtaining other relevant authorizations for the All Season Road, and carrying out the necessary field programs.

For questions or concerns, please contact myself at Lynn.Boettger@canadianzinc.com or Claudine Lee, VP Corporate Social Responsibility at Claudine.Lee@canadianzinc.com.

Sincerely,

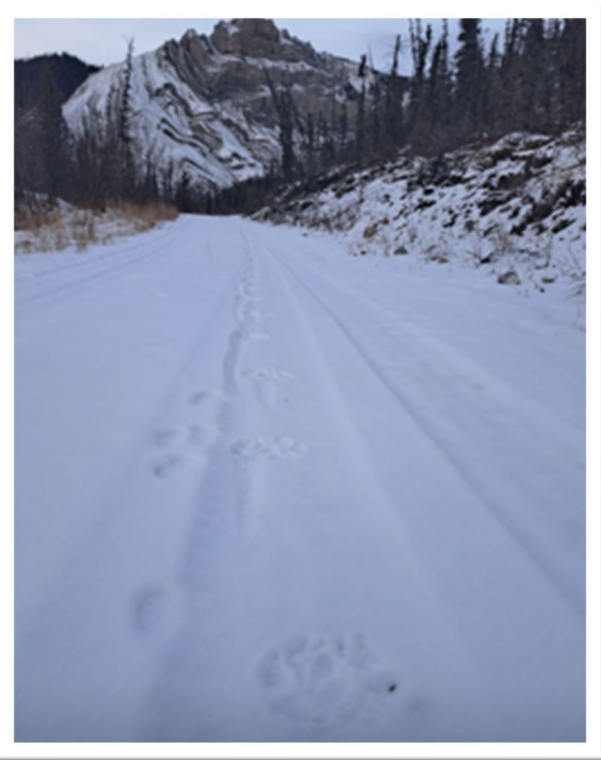


Lynn Boettger
Permitting Manager

¹ Defined in the Project's Type A Water Licences as, **Phase 2** - activities to support the Construction of the All Season Road including the Construction and operation of the Winter Road and of All Season Road Construction.

² Defined in the Project's Type A Water Licences as, **Construction** - any activities undertaken during any phase of the Project to construct, build, upgrade, or replace any structures, facilities, or components of, or associated with, the Project.

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Measure (Party responsible is CZN unless otherwise indicated)		Status (as of December 31, 2025)
5-1: Independent technical review panel	<p>Part 1: Introduction</p> <p>CanZinc will establish and fund an independent technical review panel to evaluate and approve the final road design. The developer will follow the final recommendations of the review panel with respect to road design. CanZinc will develop a terms of reference for the panel based on the requirements of this measure.</p>	<ul style="list-style-type: none"> ▪ The Independent Technical Review Panel (ITRP or the Panel) has been established. ▪ A Terms of Reference (TOR) was approved in January 2020.
	<p>Part 2: Panel Mandate</p> <p>The mandate of the independent technical review panel will be to provide independent expert advice and recommendations on the design and construction of the road to minimize: traffic related accidents, road failure or malfunctions, and any resulting significant adverse impacts on human safety or the environment.</p> <p>The panel will ensure that the road is designed and constructed to an appropriate standard that is highly protective of people and the environment, including consideration of:</p> <ol style="list-style-type: none"> i. the number and type of mine and non-mine related vehicles expected to use the road; ii. two-way traffic; iii. human safety and minimizing traffic related accidents; iv. permafrost degradation and impacts on water quality; and, v. appropriate road design criteria, including but not limited to: <ul style="list-style-type: none"> ○ watercourse crossings; ○ right of way clearing width; ○ road alignment, grades, subgrade width, and road widening at curves; 	<ul style="list-style-type: none"> ▪ See Part 1. <div style="display: flex; align-items: center; justify-content: center;">  <div style="margin-left: 20px;"> <p><i>Existing road route taken from approximately KM 6 looking north towards Folded Mountain. November 2025.</i></p> </div> </div>

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Measure (Party responsible is CZN unless otherwise indicated)		Status (as of December 31, 2025)
	<ul style="list-style-type: none"> ○ cut and fill slopes, cut and fill slope angles, slope stability; and ○ number of, and distance between, pullouts. 	
	<p>Part 3: Panel Composition</p> <p>At a minimum, the panel will be comprised of three members who are professional engineers and geoscientists. The panel must have expertise in northern road design, including permafrost and mountainous terrain experience. Members of the panel will have knowledge and experience to appropriately address the mandate in Measure 5-1 part 2 and considerations in Measure 5-1 part 5. CanZinc will engage with Parks Canada, the Mackenzie Valley Land and Water Board, the Government of the Northwest Territories, Nahanni Butte Dene Band, Liidlii Kué First Nation, and Dehcho First Nations on the panel composition. Members of the panel will be independent and will be approved by the Mackenzie Valley Land and Water Board and Parks Canada.</p>	<ul style="list-style-type: none"> ▪ See Part 1
	<p>Part 4: Panel Activities and Timing</p> <p>The panel will be established prior to detailed design of the road. CanZinc will engage with Parks Canada, the Mackenzie Valley Land and Water Board, the Government of the Northwest Territories, Nahanni Butte Dene Band, Liidlii Kué First Nation, and Dehcho First Nations on the panel activities. CanZinc will provide the panel’s reports to Parks Canada and the Mackenzie Valley Land and Water Board. At a minimum, the panel will complete the activities listed below.</p> <ul style="list-style-type: none"> i. Prior to detailed design of the road: <ul style="list-style-type: none"> ○ review and comment on the Panel’s terms of reference. ii. During detailed design of the road: <ul style="list-style-type: none"> ○ work with CanZinc to review updated information, design plans, and detailed design work, including the terrain stability assessments 	<ul style="list-style-type: none"> ▪ See Part 1 ▪ The Panel contributed to the detailed design review of the Phase 1 Winter Road. ▪ The Panel will be involved in the detailed design review of the Phase 2 All Season Road (ASR).

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	<p>undertaken for the proposed cut and fill slopes, and the developer’s detailed interpretation of the permafrost conditions at the site upon completion of geotechnical site investigation work; and,</p> <ul style="list-style-type: none"> ○ provide advice and recommendations for improving road design, following the mandate above, and considering construction, operations and maintenance, closure and reclamation, and temporary closure. <p>iii. Following detailed design of the road:</p> <ul style="list-style-type: none"> ○ review the detailed design documents for the road; ○ provide a preliminary report to CanZinc on the panel’s findings and conclusions, including any additional or outstanding recommendations; ○ review CanZinc’s response and justification for any recommendations the developer does not wish to follow; ○ prepare and submit a final report to CanZinc that includes the panel’s findings and conclusions on the final design. <p>iv. During construction:</p> <ul style="list-style-type: none"> ○ work with the developer and regulatory authorities to determine the frequency and nature of the panel’s activities during construction (at a minimum, the panel will be consulted and have the opportunity to revise its final report if any material changes to design are made following the panel’s report). 	
	<p>Part 5: Other Panel Considerations</p> <p>The independent technical review panel will also consider any relevant information on the record from EA1415-01, information gathered as a result of relevant CanZinc commitments, and the requirements and outcomes of Review Board measures. This includes, but is not limited to:</p> <ul style="list-style-type: none"> i. the updated risk assessment (Appendix C, commitment #241); 	<ul style="list-style-type: none"> ▪ The Panel will be involved in the detailed design review of the Phase 2 All Season Road (ASR) and this will include those documents, reports, assessments, and information as indicated in Part 5.

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	<ul style="list-style-type: none"> ii. terrain stability assessment reports (Appendix C, commitment #137) and any additional mitigation required to address instability; iii. avalanche related information (Appendix C, commitment #114; Suggestion 5- 1); iv. individual detailed borrow site plans and designs (Appendix C, commitment #119); v. geotechnical, geophysical, permafrost, and hydrological investigations (Appendix C, commitments #129, #156, #232, #235; Measure 12-1; Measure 8-1); vi. the Traffic Control Mitigation and Management Plan (Measure 5-2); vii. relevant management plans and proposed mitigations; viii. extreme weather events; ix. climate change; and, karst features. 	
<p style="text-align: center;">Measure 5-2 Traffic Control Mitigation and Management Plan</p>	<p>Part 1: Introduction</p> <p>In order to prevent significant adverse impacts from the Project on human safety, water quality, and wildlife from accidents and increased harvest along the road, CanZinc will create a Traffic Control Mitigation and Management Plan. The purpose of the plan is to manage access control mitigations and all traffic on the road, including mine and non-mine traffic. The plan will consider all Project phases (construction, operation, closure [including temporary closure]) as well as seasonal or weather related closure. This plan will replace Section 7.1 of the Road Operations Plan.</p> <p>Prior to construction, the developer will submit this plan to the Mackenzie Valley Land and Water Board and Parks Canada for approval, as a condition of respective land use permits. CanZinc will operate in accordance with the approved plan.</p>	<ul style="list-style-type: none"> ▪ The Land Use Permits for the Project have a condition(s) for the submission of a Traffic Control Mitigation and Road Operations and Maintenance Plan (Traffic Plan). ▪ A version of the Traffic Plan (for Phase 1) was submitted and approved by the regulators. <p>In 2025, for Phase 2 (All Season Road Construction):</p> <ul style="list-style-type: none"> ▪ CZN submitted Version 3.1 of the Traffic Plan for Phase 2. ▪ The Mackenzie Valley Land and Water Board approved Version 3.1. ▪ Following clarification correspondence throughout the fall of 2025 regarding Parks Canada Directives, Parks Canada did not approve Version 3.1 and have required revisions to the Plan.

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<p style="text-align: center;">Measure (Party responsible is CZN unless otherwise indicated)</p>	<p style="text-align: center;">Status (as of December 31, 2025)</p>
<p>Part 2: Managing Traffic on the Road</p> <p>CanZinc will include all the mitigations it has identified for controlling non-mine traffic on the road in the Traffic Control Mitigation and Management Plan. The plan will describe roles and responsibilities for non-mine traffic mitigation and monitoring. At a minimum CanZinc will:</p> <ul style="list-style-type: none"> i. exercise its right to control access on the lease parcels at the Liard River to control non-mine traffic; ii. operate a checkpoint when haul trucks are using the road and document all traffic known to be on the road; and iii. install signs indicating that the road is operated as a mine haul road and any public traffic using the road does so entirely at its own risk. <p>In the Traffic Control Mitigation and Management Plan, CanZinc will also address mitigation and management strategies for all traffic on the road, including how this relates to the Journey Management System that CanZinc intends to use for mine traffic. Mitigations to increase safety on the road with both mine and non-mine traffic present should consider:</p> <ul style="list-style-type: none"> a) the independent technical review panel’s conclusions on road design and safety; and, b) data sources that can provide information about high wildlife collision areas and non-mine traffic presence (such as wildlife camera traps [see Measure 6-3] and the harvest monitoring program[see Suggestion 7-1]). <p>CanZinc will monitor non-mine traffic on the road and establish adaptive management, following the guidance in Appendix B of this Report of EA, within the Traffic Control Mitigation and Management Plan.</p>	<ul style="list-style-type: none"> ▪ See Part 1.

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<p><i>Suggestion 5-1 Avalanches (Developer)</i></p>	<p>In order to reduce the likelihood of potential adverse impacts on human safety and Project infrastructure resulting from avalanches, the Review Board suggests the developer implement the following recommendations, prior to construction in high avalanche risk areas, based on the Alpine Solutions report and CanZinc’s commitments.</p> <ol style="list-style-type: none"> i. Review and update the avalanche hazard maps based on the final road alignment. ii. Complete a helicopter based reconnaissance in order to refine avalanche path locations and hazard areas. The helicopter based access will allow for ground based assessments in select areas. This reconnaissance could be completed in summer or winter. iii. Prepare an Avalanche Hazard Management Plan prior to construction. The plan will specify all measures employed to reduce risk to vehicles and occupants. This plan could be stand-alone or housed within the Emergency Response Plan (Appendix C, commitment #244). iv. If CanZinc or the independent technical review panel determine that more detailed avalanche risk assessment is required, complete a linear risk analysis. A typical method which can be used to compare with other industrial roads is the ‘Avalanche Hazard Index’.² v. Incorporate the potential impacts of avalanches on crossings structures near avalanches paths (see also Appendix C, commitment #116). vi. Use all avalanche assessment and mapping information, including relevant mitigation options identified in the Alpine Solutions report, when updating the Road Operations Plan and the Avalanche Hazard Management Plan. vii. Provide the results of the above work to the independent technical panel (Measure 5-1). <p>The Review Board acknowledges that there may be new or preferred methods of completing the above work and preventing significant impacts from avalanches and encourages the developer to use these where applicable.</p>	<ul style="list-style-type: none"> ▪ The Land Use Permits for the Project have a condition(s) for the submission of an Avalanche Hazard Management Plan (AHMP). ▪ An AHMP (for Phase 1) was submitted to the regulators and approved. ▪ CZN is updating the approved version of the Phase 1 AHMP Plan in preparation for Phase 2.


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<i>Suggestion 5-1 Avalanches (Regulators)</i>	The Review Board suggests that the Mackenzie Valley Land and Water Board and Parks Canada consider the Alpine Solutions recommendations, CanZinc’s commitments, and Suggestion 5-1 when setting land use permit conditions.	<ul style="list-style-type: none"> ▪ This suggestion is not directed at CZN. ▪ See Suggestion 5-1 (Developer).
Measure 6-1 Wildlife Management	<p>Part 1: Wildlife Baseline Information Collection, Monitoring, Mitigation and Adaptive Management Program</p> <p>In order to reduce adverse impacts on wildlife and wildlife habitat so they are no longer significant, the developer will collect additional wildlife baseline information to be integrated with mitigation, focused monitoring, and a systematic approach to adaptive management.</p> <p>In order to accomplish this, CanZinc will:</p> <ol style="list-style-type: none"> i. collect baseline data as described in Part 2 of this measure; ii. monitor wildlife and wildlife habitat during construction and operations as described in Part 3; iii. incorporate Traditional Knowledge in developing and implementing a monitoring program; and, iv. develop and implement an adaptive management framework to manage impacts on wildlife. 	<ul style="list-style-type: none"> ▪ A WMMP (for Phase 1) was submitted to the regulators and approved. ▪ CZN is updating the approved version of the Phase 1 plan for Phase 2. ▪ See Part 2.
	<p>Part 2: Collection of Baseline Wildlife Information for Caribou, Collared Pika and Bird Species at Risk that Occur in the Area</p> <p>The purpose of this baseline information collection is to confirm the presence or absence of listed wildlife species in the Project area, their population size, seasons of use and important habitat for species described below in the All Season Road corridor. In order to support Part 1, the developer will:</p> <ol style="list-style-type: none"> a) submit a baseline survey plan for review and approval to Parks Canada within the NNPR and to GNWT on territorial lands; 	<ul style="list-style-type: none"> ▪ Collection of baseline information is ongoing. ▪ All available baseline information will be included in the Phase 2 WMMP. ▪ Collaboration between CZN, Parks Canada, and the Government of the Northwest Territories has been a key factor in advancing wildlife baseline collection. <p>In 2025:</p>

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	<ul style="list-style-type: none"> b) conduct baseline surveys for northern mountain caribou, boreal caribou, collared pika, and bird species at risk; c) use recognized methods and standards approved by Parks Canada within NNPR, by GNWT on territorial lands, and by ECCC for species at risk; d) conduct surveys at the direction and approval of Parks Canada within NNPR and of the GNWT on territorial lands; complete surveys prior to road construction; e) share its baseline wildlife information with Aboriginal organizations, including NBDB, LKFN and DFN; and, f) present the results of its baseline information collection with Aboriginal organizations, including NBDB, LKFN and DFN, in a culturally-appropriate way. 	<ul style="list-style-type: none"> ▪ 38 Autonomous Recording Units (ARUs) were deployed (May) along the All Season Road Route and then retrieved (September) at the end of the season. ▪ Dall’s sheep lambing site survey proximal to the Prairie Creek Mine airstrip and access road. ▪ Bat habitat surveys were conducted in June. Research priorities focused on the deployment of passive acoustic detectors with capture surveys occurring opportunistically. The purpose of this work was to identify and document areas of concern for over-wintering hibernacula and summer maternity roosts for bats that may be impacted by the development of the Project. ▪ Boreal caribou live collar data continues to be delivered directly to GNWT-ECCC and mountain caribou collar data is provided to Tetra Tech and shared directly with GNWT-ECC, Parks Canada, and CZN.
	<p>Part 3: Wildlife Monitoring Programs</p> <p>In order to reduce adverse impacts on wildlife so they are no longer significant, the developer will prepare and implement a systematic monitoring program(s) for wildlife that may be affected by the Project.</p> <p>The developer will:</p> <ul style="list-style-type: none"> a) submit monitoring program(s) for review and approval to Parks Canada within the NNPR and GNWT on territorial lands; b) focus on monitoring of northern mountain caribou, boreal caribou, collared pika, and bird species at risk; c) use recognized methods and standards approved by Parks Canada within NNPR, by GNWT on territorial lands, and by ECCC for species at risk; d) conduct monitoring through all phases of the Project; 	<ul style="list-style-type: none"> ▪ 2024 Annual Reporting submitted in 2025 and underwent a public review period. ▪ Community presentations and information sharing as requested. ▪ See the responses to Parts 1 and 2 above.


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	<ul style="list-style-type: none"> e) formalize monitoring programs within the Wildlife Management and Mitigation Plan (Measure 6-2); f) provide annual monitoring reports to Parks Canada, GNWT, ECCC, NBDB, LKFN and DFN; g) share its wildlife monitoring data with Aboriginal organizations including NBDB, LKFN and DFN; and, h) present the results of its wildlife monitoring programs to Aboriginal organizations, including NBDB, LKFN and DFN, in a culturally appropriate way. 	
Measure 6-2 Wildlife Management and Monitoring Plan (WMMP)	<p>Part 1: GNWT to Require a WMMP</p> <p>In order to reduce adverse impacts on wildlife and wildlife habitat so they are no longer significant, GNWT will require the developer to prepare and implement a Wildlife Management and Monitoring Plan. The GNWT will:</p> <ul style="list-style-type: none"> a) require that the developer prepare a WMMP under the legal authority of Section 95(1) of the <i>Wildlife Act</i> for portions of the Project in its jurisdiction; and b) include opportunity for public review of and comment on the final WMMP prior to construction and on updates to the WMMP throughout the life of the Project. 	<ul style="list-style-type: none"> ▪ Measure is not for CZN. <div style="text-align: center; margin-top: 10px;"> <p><i>Grizzly moves through the Project area, May 2025.</i></p>  </div>
	<p>Part 2: Parks Canada to Require a WMMP</p> <p>In order to reduce adverse impacts on wildlife and wildlife habitat so they are no longer significant, Parks Canada will require the developer to prepare and implement a Wildlife Management and Monitoring Plan. Parks Canada will:</p> <ul style="list-style-type: none"> a) require that the developer prepare a WMMP as a condition of an authorization for the portions of the road in its jurisdiction; and 	<ul style="list-style-type: none"> ▪ Measure is not for CZN.

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	<p>b) include opportunity for public review of and comment on the final WMMP prior to construction and on updates to the WMMP throughout the life of the Project.</p>	
	<p>Part 3: Developer to prepare and implement a WMMP</p> <p>The developer will:</p> <ul style="list-style-type: none"> a) update its draft WMMP to include all commitments and mitigations agreed to or recommended by its consultants throughout the EA; b) develop an adaptive management framework that links the results of monitoring with adjustments to mitigations as part of the WMMP that satisfies the requirements set out in Appendix B of this report; c) describe how the monitoring data is linked with adaptive management in the Traffic Control and Management Plan; d) submit its updated WMMP to the wildlife regulators described in Parts 1 and 2 for review and approval prior to construction; and e) prepare and submit an annual report to wildlife regulators on the effectiveness of the WMMP that includes a description of how the adaptive management framework was used to address Project impacts. 	<ul style="list-style-type: none"> ▪ A WMMP (for Phase 1) was submitted to the regulators and approved. ▪ CZN is updating the approved version of the Phase 1 plan for Phase 2. ▪ All available baseline information will be included in the Phase 2 WMMP. ▪ Refer to other Parts of this measure for more details.
<i>Suggestion 6-1: Regulator Collaboration</i>	<p>Wildlife regulators should work together to ensure the WMMP is consistent for the entire All Season Road.</p>	<ul style="list-style-type: none"> ▪ This suggestion is not directed at CZN.


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		<p><i>Wolverine in the Project area, date unknown.</i></p> 
<p>Measure 6-3 Reducing the Risk of Vehicle Collisions with Wildlife</p>	<p>In order to reduce the likelihood of significant impacts on wildlife from collisions with vehicles along the road, the developer will identify and communicate wildlife caution zones to road users. The details of this approach will be incorporated into the developer’s WMMP (referred to in Measure 6-2) and will include:</p> <ul style="list-style-type: none"> a) a description of how wildlife information from drivers will be collected and recorded to inform the selection of wildlife crossing areas; b) a detailed system for identifying wildlife (specifically big game as defined in the <i>Wildlife Act</i>) caution zones and marking them along the road (such as where sightings or collisions have occurred or where Traditional Knowledge identifies trails); c) use of a remote camera trap system to identify wildlife road crossing areas and identify non-mine related traffic; d) annual reporting of wildlife sightings by drivers that includes vehicle collisions with wildlife, locations of signage for wildlife caution zones and whether they were modified based on operational experience; 	<ul style="list-style-type: none"> ▪ The Land Use Permits for the Project have a condition(s) for the submission of a Traffic Control Mitigation and Road Operations and Maintenance Plan (Traffic Plan). ▪ See Measure 5-2 Part 1 for more information specific to the Traffic Plan. ▪ A WMMP (for Phase 1) was submitted to the regulators and approved. ▪ WMMP 2024 Annual Reporting submitted in 2025. ▪ CZN is working on the WMMP and Traffic Plan for Phase 2.


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	<p>e) annual reporting to regulators of remote camera log results, locations of primary wildlife crossings and how wildlife caution zones were modified based on monitoring results (if applicable); and,</p> <p>f) annual reporting to regulators on road use by non-mine vehicles using data from remote camera logs.</p> <p>The GNWT will regulate this measure on territorial lands and Parks Canada will regulate this measure within the NNPR. Reporting will be included in the WMMP annual report.</p>	
<i>Suggestion 7-1: Harvest Monitoring Program (Regulators)</i>	<p>In order to mitigate potential adverse impacts of new access on traditional harvesting, wildlife management authorities should work with communities and harvesters to develop and implement a harvest monitoring program. The program should:</p> <ol style="list-style-type: none"> i. identify value-based objectives for successful harvest monitoring with measurable and achievable goals to meet objectives; ii. identify pre-construction harvest information that can be used for comparison over time; iii. implement monitoring activities specific to understanding harvest activities using methods that meet the needs of local communities and wildlife management authorities; iv. track and report on harvest patterns and pressures during the life of the Project in order to identify adverse trends; and, v. recommend adaptive mitigations to reverse any adverse trends through the Traffic Control Mitigation and Management Plan or the Wildlife Management and Monitoring Plan. 	<ul style="list-style-type: none"> ▪ This suggestion is not directed at CZN. ▪ There is some relevant information required for the WMMP as well as the Traffic Plan.
<i>Suggestion 7-2: Harvest Monitoring Program (Developer)</i>	<p>In order to mitigate potential adverse impacts of new access on traditional harvesting, the developer should support and cooperate with wildlife management authorities and potentially-affected Aboriginal communities to implement the harvest monitoring program.</p>	<ul style="list-style-type: none"> ▪ There were no harvesting or hunting activities associated with the Phase 1 Winter Road. ▪ CZN will continue to support communities in implementing this once the road construction is started and throughout operations.

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<p><i>Suggestion 7-3: Examples of Harvest Monitoring Programs</i></p>	<p>The Review Board suggests that the developer, local communities and wildlife management authorities consider existing community-based harvest monitoring programs, including the Inuvialuit Settlement Region Community-based Monitoring Program and Tlicho Check Station Reports, for suggestions on harvest monitoring program design.</p>	<div style="display: flex; align-items: center;">  <div style="margin-left: 20px;"> <ul style="list-style-type: none"> ▪ Suggestion is not for CZN. ▪ A harvest monitoring program is included in the Phase 1 WMMP and this will be expanded on in the Phase 2 WMMP as per comments from Parks Canada. <p style="text-align: right; margin-top: 20px;"><i>Fireweed, August 2025.</i></p> </div> </div>
<p><i>Suggestion 7-4: Education about Objectives</i></p>	<p>The Review Board suggests that the developer, local communities and wildlife management authorities develop outreach and educational activities and materials to inform road users about the objectives of any harvest monitoring program.</p>	<ul style="list-style-type: none"> ▪ It is the intent to have this type of information available to the users of the road at the security checkpoint.
<p>Measure 8-1: Water Baseline Data, Mitigation, Monitoring, and Adaptive Management</p>	<p>Part 1: Introduction</p> <p>To ensure that the road and crossings are designed to an appropriate standard, and constructed and operated in a manner that will be protective of the environment, CanZinc will:</p> <ol style="list-style-type: none"> i. collect additional baseline data; ii. identify and implement appropriate mitigation to prevent significant adverse impacts; iii. combine monitoring programs and plans to coordinate water monitoring efforts; and 	<ul style="list-style-type: none"> ▪ Baseline information has been included in the design for the Phase 1 Winter Road as well as the design of the All Season Road. This includes but is not limited to information such as rare plant species, invasive species, wildlife (birds, caribou, toads, etc.), fish habitat, locations of permafrost, terrain stability analysis, and water quality.


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	<p>iv. incorporate principles of adaptive management into road and crossing design and monitoring.</p> <p>Parks Canada, Fisheries and Oceans Canada, and the Mackenzie Valley Land and Water Board will (within their respective jurisdictions) review and approve CanZinc’s actions to ensure the requirements of this measure are satisfied.</p>	
	<p>Part 2: Baseline Data</p> <p>CanZinc will collect baseline data necessary to enable the design, construction, and maintenance of watercourse crossings that are protective of the environment and inform future monitoring. CanZinc will install hydrometric stations and use the resulting data in its road and crossing designs. These stations will measure continuous streamflow data during the open water season and instantaneous flow measurements during the ice-covered period for a minimum of one year prior to construction of watercourse crossings. The stations will be established to:</p> <ol style="list-style-type: none"> i. characterize spatial variability; ii. characterize variability in watershed size; iii. measure conditions at Sundog Creek and other key locations* (to be determined in consultation with regulators); and, iv. provide locations for ongoing monitoring during operations. <p>A minimum of one year of this data will be collected prior to the start of activities related to construction of watercourse crossings, and data collection will continue into construction (see Measure 8-1 part 4).</p> <p>CanZinc will work with Parks Canada, Fisheries and Oceans Canada, and the Mackenzie Valley Land and Water Board to determine what, if any, other water baseline data is required prior to construction to inform mitigation, future monitoring, and adaptive management.</p>	<ul style="list-style-type: none"> ▪ See Part 1. ▪ CZN continues to work with Parks Canada (and others as needed) to determine and collaborate on the baseline work that is valuable and necessary to collect. <div style="text-align: center;">  <p><i>Collection of bird baseline data through an Autonomous Recording Unit (ARU), September 2024.</i></p> </div>


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<p>* Such as Casket Creek (km 6.2), Grainger River (km 124.8), and the tributary of Grainger River preferred alignment option (km 118.1).</p>	
<p>Part 3: Mitigate Impacts on Water Quality</p> <p>CanZinc will use the baseline data collected, as well as any other relevant information and best management practices, to determine appropriate mitigation prior to construction and to revise detailed design plans for watercourse crossings.</p> <p>The developer will share the baseline data with all relevant regulatory authorities and the independent panel (Measure 5-1) to facilitate Project review, permitting, and licensing.</p>	<ul style="list-style-type: none"> ▪ There are conditions within the Water Licences for a Water Management Plan (note the title of this plan changed from the Type B water licences to become Water Management instead of Water Monitoring). ▪ The development of this plan includes baseline data as well as mitigation(s) and is subject to regulator approval(s). ▪ A Water Monitoring Plan was approved for the Phase 1 Winter Road.
<p>Part 4: Monitoring</p> <p>CanZinc has identified many different plans, programs, and commitments for monitoring Project effects on water during construction and operation. CanZinc will amalgamate these plans, programs, and commitments, to the extent feasible and practical, so that water monitoring is consolidated and coordinated. The Review Board understands that for operational purposes, CanZinc may wish to keep certain aspects of water monitoring separate. The Review Board encourages the developer to consolidate where it can, in order to simplify the number of plans to create and report on. The Review Board considers that this may be relevant to the following commitments (Appendix C): #55, #93, #94, #211, #212, #217, #218, and #239, among others.</p> <p>Regarding ongoing monitoring at hydrometric stations, Parks Canada and the Mackenzie Valley Land and Water Board will review and approve monitoring plans, through the water licenses, and determine if and when ongoing monitoring can be phased out.</p>	<ul style="list-style-type: none"> ▪ See Part 3. ▪ CZN continues to look for opportunities to combine its commitments, and in some cases regulatory obligations, to increase efficiencies for all.

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	<p>Part 5: Adaptive Management</p> <p>As part of the water monitoring program(s), CanZinc will establish and implement an adaptive management framework that satisfies the requirements of Appendix B. This will include thresholds and actions that will be developed and adapted using all available baseline information, effects monitoring results, and Traditional Knowledge and will consider ways to coordinate or compliment Aboriginal monitoring initiatives (see Measure 15-4).</p>	<ul style="list-style-type: none"> Adaptive management is part of the requirement(s) within the Land Use Permits and Water Licences for all of the management plans.
<p><i>Suggestion 8-1: Regulator Coordination for Water Monitoring</i></p>	<p>The Project crosses a number of jurisdictional boundaries and that water will be regulated by several different government agencies, including Parks Canada, Fisheries and Oceans Canada, and the Mackenzie Valley Land and Water Board. The Review Board encourages all regulators involved in the review and approval of the Project to work collaboratively to minimize duplication of monitoring and reporting requirements and develop consistency between monitoring program components. The Review Board also recommends to regulatory agencies that many aspects of Measure 8-1 could be incorporated into an aquatic effects monitoring program.</p>	<ul style="list-style-type: none"> This suggestion is not directed at CZN. <div style="text-align: center;">  <p><i>Autumn water scene in the Project area, 2025.</i></p> </div>
<p><i>Suggestion 8-2: Acid Rock Drainage and Metal Leaching</i></p>	<p>The Review Board suggests that Parks Canada and the Mackenzie Valley Land and Water Board enforce strict acid rock drainage and metal leaching conditions to minimize any potential impacts on water quality or fish from acid rock drainage or metal leaching.</p>	<ul style="list-style-type: none"> This suggestion is not directed at CZN.

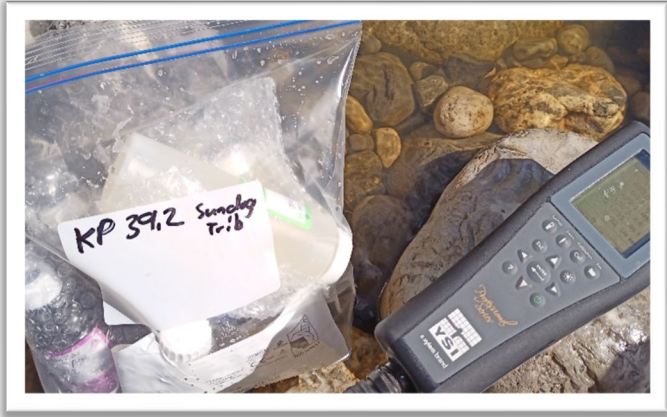
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<p>Measure 9-1: Effects Mitigation, Baseline Data, Monitoring, and Adaptive Management for the Sundog Creek Diversion</p>	<p>Part 1: Introduction</p> <p>In order to prevent significant adverse impacts on fish and fish habitat, CanZinc will design, construct and operate the Sundog Creek diversion channel in a way that is protective of fish and fish habitat and ensures the ecological and hydraulic effectiveness of the diversion. Toward this end, CanZinc will develop a Sundog Creek Diversion Plan to:</p> <ul style="list-style-type: none"> a) Mitigate and minimize potential adverse effects on fish and fish habitat from the Sundog Creek diversion through appropriate and protective channel design, and by using all available best practices during construction and operation of the channel. b) Collect baseline data necessary to design, construct and maintain the diversion channel in a way that is protective of fish and fish habitat throughout the life of the Project. c) Monitor for project-related effects on physical and biological characteristics relevant to the maintenance of effective fish habitat and ecological integrity and to ensure that mitigations are operational and effective. d) Develop and implement an adaptive management framework for Project effects on fish and fish habitat and ecological integrity. <p>Parks Canada and DFO must review and approve this plan prior to the start of construction.</p>	<ul style="list-style-type: none"> ▪ There is no longer a Sundog Creek Diversion Plan. ▪ CZN has incorporated all the baseline data and relevant information to develop the least impactful design for the Sundog Creek area. <div style="text-align: center;">  <p><i>Sundog Creek area, May 2024.</i></p> </div>
	<p>Part 2: Collect Baseline Information</p> <p>CanZinc will collect baseline data necessary to design, construct and operate the Sundog Creek diversion so that fish and fish habitat are protected through the life of the Project. This baseline information will also be used to verify EA predictions and inform adaptive management. Prior to commencement of construction of the Sundog</p>	<ul style="list-style-type: none"> ▪ See Part 1.

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<p>Creek diversion, CanZinc will collect a minimum of one year of baseline data for both hydrological and ecological characteristics, including at a minimum, information on:</p> <ul style="list-style-type: none"> i. benthic invertebrates; ii. aquatic vegetation; iii. fish use and occupancy; iv. channel morphology; v. flow characteristics; vi. water quality; vii. hydrology (as described in Measure 8-1); and viii. any other variables of concern as deemed appropriate by DFO or Parks Canada. 	
<p>Part 3: Mitigate or Minimize Potential Adverse Effects</p> <p>CanZinc will use all available best management practices and all available baseline data (including data requirements in measure 8-1 and 9-1) to design and construct the Sundog Creek diversion channel to avoid and mitigate adverse effects on fish and fish habitat, including both ecological and hydrological considerations.</p>	<ul style="list-style-type: none"> ▪ See Part 1.
<p>Part 4: Monitor Project Effects</p> <p>CanZinc will develop and implement a monitoring plan to detect project-related effects on fish and fish habitat from the Sundog Creek diversion. Monitoring must consider both hydrological and ecological characteristics including, at a minimum:</p> <ul style="list-style-type: none"> i. benthic invertebrates; ii. aquatic vegetation; iii. fish use and occupancy; iv. channel morphology; 	<ul style="list-style-type: none"> ▪ See Part 1.

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	<p>v. flow characteristics; vi. water quality; vii. hydrology ; and viii. any other variables of concern as deemed appropriate by DFO or Parks Canada.</p> <p>Monitoring will consider both short and long-term effects of the diversion, and will incorporate appropriate flexibility such that monitoring requirements can be adjusted to reflect the Project stage, past monitoring results, and likely effects.</p>	 <p><i>Sundog Creek area water quality monitoring equipment, 2023.</i></p>
	<p>Part 5: Adaptive Management of Project Effects</p> <p>CanZinc will develop and implement an adaptive management framework for effects on fish and fish habitat from the Sundog Creek diversion that satisfies the requirements of Appendix B.</p>	<ul style="list-style-type: none"> ▪ See Part 1. ▪ Development of an adaptive management framework is a condition of the Project authorizations for the Fish and Fish Habitat Protection Plan. This plan is subject to a public review and approval process.
<i>Suggestion 9-1: Regulatory Collaboration</i>	<p>All regulators involved in the review and approval of the Sundog Creek Diversion Plan should work collaboratively to minimize duplication of monitoring and reporting requirements and develop consistency between monitoring program components, to the greatest extent possible.</p>	<ul style="list-style-type: none"> ▪ There is no longer a Sundog Creek Diversion Plan. ▪ See Part 1.
Measure 10-1: Traditional Knowledge	<p>In order to prevent significant adverse impacts on heritage resources, and to support Traditional Knowledge requirements in other measures in this Report of EA, the developer will:</p>	<ul style="list-style-type: none"> ▪ An engagement plan (Version 3.1) was submitted and approved for Phase 2. ▪ Engagement activity is reported in the Annual Report(s) for Project authorizations.


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	<ul style="list-style-type: none"> i. engage with potentially-affected Aboriginal groups, including Nahanni Butte Dene Band, Liidlii Kué First Nation, and Dehcho First Nations, about ways to avoid impacts from the Project, including impacts on heritage resources; ii. conduct this engagement prior to the Archaeological Impact Assessment(AIA), so that the resulting information can inform the AIA (see Measure 10- 2); iii. thoroughly consider and, where applicable, incorporate Traditional Knowledge into Project design, mitigations, monitoring, and adaptive management; and iv. submit an updated engagement record and plan in accordance with Mackenzie Valley Land and Water Board (MVLWB) Engagement Guidelines⁴ for review and approval by Parks Canada and the MVLWB. <p>The developer will do this in a culturally-appropriate way that respects applicable Traditional Knowledge policies and protocols.</p>	<ul style="list-style-type: none"> ▪ CZN maintains an ongoing, regular, and frequent dialog with Indigenous Governments at various levels including with Chief and Council/Leadership, Technical Advisors, and community members. Meetings have been held by phone and video calls with in person meetings as requested and agreed to by the participants.
Measure 10-2: Archaeological Impact Assessment	<p>In order to prevent significant adverse impacts on heritage resources, the developer will conduct an Archaeological Impact Assessment to the specifications detailed in commitments #215 and #216 in Appendix C of this Report. The Archaeological Impact Assessment will also:</p> <ul style="list-style-type: none"> i. be developed in consultation with Parks Canada, the Government of the Northwest Territories, Nahanni Butte Dene Band, Liidlii Kué First Nation, and Dehcho First Nations; ii. incorporate all evidence of place names, traditional land use, Traditional Knowledge, cultural and spiritual use, and harvesting in the vicinity of the Project; iii. be conducted along the final alignment of the All Season Road, at borrow site locations, and other areas where ground disturbance is proposed; and be completed prior to any new ground disturbance. 	<ul style="list-style-type: none"> ▪ Since the conclusion of the Environmental Assessment the following Archaeological Impact Assessments (AIAs) were conducted: <ul style="list-style-type: none"> ○ For the Phase 1 Winter Road/All Season Road geotechnical testing program (2018/2019); ○ Within the territorial portion of the ASR (2021); ○ Additional work as per Parks Canada direction (2022) along previously identified sites along the All Season Road; and ○ For all remaining areas of the proposed ASR within the NNPR not previously assessed during the 2022 AIA, were subject to pedestrian survey (2023) along with portions on Territorial Lands.

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		<ul style="list-style-type: none"> ▪ In 2019 the Łíídlǐ ǎKúé First Nation and Nahąą Dehé Dene Band completed a <i>Land Use Study and Gap Analysis for the Prairie Creek All Season Road Project</i>. Note that this was revised in April 2021. ▪ In 2022 the Acho Dene Koe First Nation <i>Traditional Use Study for the Prairie Creek All-Season Road Project</i> was completed.
Measure 11-1: Rare Plant and Rare Plant Assemblage Baseline Surveys and Management in the Nahanni National Park Reserve	<p>Part 1: Baseline Surveys</p> <p>In order to inform effective mitigations, adaptive management, and reclamation and to prevent significant adverse impacts on vegetation within Nahanni National Park Reserve, the developer will complete vegetation field surveys focussed <i>[sic]</i> on the presence of rare plants and rare plant assemblages prior to ground disturbance or clearing5 within Nahanni National Park Reserve. Parks Canada will approve the details of these surveys, including timing, seasonality, and methods.</p> <p>CanZinc will use the results of the baseline surveys to inform the following:</p> <ul style="list-style-type: none"> i. understanding impacts on rare plants and rare plant assemblages; ii. identifying appropriate mitigation to prevent significant adverse impacts; iii. monitoring and adaptive management; and iv. closure and reclamation. <p>The results of the baseline surveys will be submitted to Parks Canada.</p>	<ul style="list-style-type: none"> ▪ A Rare Plant Management Plan is required by the Land Use Permit(s) for the Project. ▪ Rare Plant Management Plan was developed and approved for Phase 1 Winter Road. ▪ Each Rare Plant Management Unit was surveyed in its entirety in 2023. ▪ Rare Plant Management Plan submitted and approved for Phase 2 in 2024.
	<p>Part 2: Rare Plant Management Plan</p> <p>In order to prevent significant adverse impacts on rare plants as a result of construction and operation, CanZinc will develop a Rare Plant Management Plan prior to construction. This plan will include mitigation, monitoring, and adaptive management for rare plants.</p>	<ul style="list-style-type: none"> ▪ See Part 1.

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	<ul style="list-style-type: none"> • Mitigation: CanZinc will use the information gathered in the surveys required by Measure 11-1 part 1, as well as any other relevant information, to identify appropriate mitigation within the plan to minimize significant adverse impacts on rare plants or rare plant assemblages. • Effects monitoring: The plan will include details on how rare plants will be identified and monitored during construction and operations activities. The plan will include effects monitoring for any identified rare plants or rare plant assemblages. • Adaptive management: The plan will include the principles of adaptive management outlined in Appendix B. This will include identifying the actions that will be taken if rare plants are identified at any time during construction and operation of the Project. <p>The Rare Plant Management Plan will be reviewed and approved by Parks Canada prior to construction. The developer will operate in accordance with the approved plan.</p>	 <p><i>Alpine Groundsel, Status: Sensitive (NT GS Rank), undated.</i></p>
	<p>Part 3: Mitigation</p> <p>CanZinc will mitigate the potential spread of invasive species by implementing the mitigations it has already identified (e.g., the wheel-wash station). CanZinc will work with the Government of Northwest Territories and Parks Canada to identify additional mitigation that will prevent the spread of invasive species.</p>	<ul style="list-style-type: none"> ▪ See Part 1. ▪ The Traffic Plan contains details on the wash station. For further information on the Traffic Plan see Measure 6-3.
	<p>Part 4: Invasive species Management Plan</p> <p>CanZinc will revise the invasive species management framework and create an Invasive Species Management Plan prior to construction, considering off-site as well as on-site prevention and control. CanZinc will include the adaptive management principles set out in Appendix B within the invasive species management framework, the Invasive Species Management Plan, and any individual weed control plans, if or as they are developed.</p>	<ul style="list-style-type: none"> ▪ An Invasive Species Management Plan is required by the Land Use Permit(s) for the Project. ▪ Invasive Species Management Plan submitted and approved for Phase 1 Winter Road. ▪ Follow up monitoring was conducted in 2023.

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	Prior to the commencement of construction, the Invasive Species Management Plan will be reviewed and approved by Parks Canada and the Mackenzie Valley Land and Water Board, with input from the Government of Northwest Territories where appropriate, as conditions in their respective land use permits. The developer will implement the approved plan(s).	<ul style="list-style-type: none"> ▪ Version 4.0 of the Invasive Species Management Plan for Phase 2 was submitted in November 2025 to the regulators and is in the conformity checking stage of review.
<i>Suggestion 11-1: Rare Plant Assemblages</i>	The Review Board suggests that Parks Canada should provide more guidance and definitions on what rare plant assemblages in the region are important. The Review Board suggests that Parks Canada do this prior to the surveys required by Measure 11-1 in order to help guide the surveys and that Parks Canada use the information gathered in the surveys required by Measure 11-1 to assist CanZinc in determining which assemblages should be monitored through the Rare Plant Management Plan.	<ul style="list-style-type: none"> ▪ This Suggestion is not directed at CZN. ▪ Parks Canada and CZN continue to work together on rare plant and invasive species management.
<i>Suggestion 11-2: Rare Plant Management Plan</i>	The Review Board suggests that the Mackenzie Valley Land and Water Board consider requiring a Rare Plant Management Plan for the portion of the Project it regulates. The Review Board suggests that this plan could be combined with the one for NNPR and Parks Canada.	<ul style="list-style-type: none"> ▪ This Suggestion is not directed at CZN. ▪ See the above for Parts 2, 3, 4.
<i>Suggestion 11-3: Vegetation Contaminant Levels</i>	The Review Board suggests that the Mackenzie Valley Land and Water Board and Parks Canada should consider potential impacts on vegetation from contamination from spills, concentrate loading, and road dust, and determine if sampling of vegetation contaminant levels prior to operations (start of hauling), is necessary.	<ul style="list-style-type: none"> ▪ This Suggestion is not directed at CZN.
Measure 12-1: Permafrost Management	Part 1: Introduction In order to avoid permafrost degradation and prevent associated significant adverse impacts on the environment from the Project during construction, operations, closure, and post-closure, the developer will conduct additional permafrost investigations to inform design and construction of the Project and will develop and implement a permafrost management plan.	<ul style="list-style-type: none"> ▪ A Permafrost Management Plan is required by the authorizations for the Project. ▪ A Permafrost Management Plan submitted and approved for Phase 1 Winter Road. ▪ Additional baseline work was conducted in 2022/2023. ▪ The Permafrost Management Plan for Phase 2 is in development.
	Part 2: Permafrost Investigations	<ul style="list-style-type: none"> ▪ See Part 1.


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	<p>The developer will investigate permafrost and collect baseline permafrost data for the road alignment and borrow pits, provide the data and results to the independent technical review panel and to regulators, and use the information and results to inform detailed and final design.</p>	
	<p>Part 3: Design and Construction of the Project</p> <p>CanZinc will design and construct the road, borrow pits, and other infrastructure in a way that anticipates and avoids permafrost degradation and associated impacts on the surrounding environment during all phases of the Project, including post-closure.</p>	<ul style="list-style-type: none"> ▪ See Part 1. ▪ Permafrost considerations are part of the design for the All Season Road.
	<p>Part 4: Permafrost Management Plan</p> <p>The developer will establish and implement a Permafrost Management Plan that includes permafrost monitoring and adaptive management.</p> <p>The Permafrost Management Plan must include:</p> <ul style="list-style-type: none"> • monitoring to measure the effects of the Project on permafrost (with an emphasis on early detection of any changes in permafrost) and evaluate the effectiveness of Project design and mitigations in preventing or minimizing permafrost degradation; and, • an adaptive management framework that satisfies the requirements of Appendix B. <p>The Permafrost Management Plan will be for review and approval by the Mackenzie Valley Land and Water Board and Parks Canada.</p>	<ul style="list-style-type: none"> ▪ See Part 1.

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<i>Suggestion 14-1: Closure and Reclamation Plans (Developer)</i>	<p>In order to prevent post-closure impacts from the All Season Road, the developer should:</p> <ul style="list-style-type: none"> • define clear closure principles in consultation with potentially-affected Aboriginal groups, including Nahanni Butte Dene Band, Liidlii Kué First Nation, and Dehcho First Nations, and applicable regulators and land managers; and • incorporate pre-disturbance information (including vegetation, wildlife, and permafrost conditions) into closure and reclamation planning. 	<ul style="list-style-type: none"> ▪ There are requirement(s) for a Closure and Reclamation Plan in the authorization(s). CZN will engage accordingly on closure principles.
<i>Suggestion 14-2: Closure and Reclamation Plans (Regulator and Land Managers)</i>	<p>Regulators and land managers should proceed with closure and reclamation plans along the road alignment in a consistent manner, where appropriate.</p>	<ul style="list-style-type: none"> ▪ This Suggestion is not directed at CZN.
Measure 15-1: Monitoring by the Developer	<p>Part 1: Objectives</p> <p>In order to ensure that the measures the developer is responsible for are fully and effectively implemented and to inform adaptive management throughout all phases of the development, the developer will establish and implement monitoring programs that fulfill the following objectives:</p> <ol style="list-style-type: none"> i. to measure the effects of the Project on the environment; ii. to assess the implementation and effectiveness of the measures in this Report of EA for preventing or minimizing impacts on the environment; iii. to inform the implementation of the adaptive management frameworks required by measures in this Report of EA, so that mitigation can be adjusted to ensure significant adverse impacts do not occur; iv. to assess the accuracy of the developer’s predictions made during the environmental assessment, regarding the impacts of the Project on the environment; and 	<ul style="list-style-type: none"> ▪ Both the Land Use Permits and Water Licences for the Project require that there be the submission and regulator approval of various management plans (e.g. Rare Plant Management Plan, Permafrost Management plan, Fish and Fish Habitat Protection Plan, etc.). Each of these management plans requires that there be monitoring programs as well as adaptive management. CZN must abide by the approved version of each management plan. ▪ CZN is required to submit Annual Reporting that will assist in relaying information on the results of monitoring.


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	<p>v. where applicable, to provide relevant data and information to support other monitoring initiatives (such as Aboriginal monitoring initiatives and government monitoring).</p> <p>These objectives must be incorporated into all monitoring programs that are identified in measures in this Report of EA, either by revising existing programs or creating new programs.</p>	 <p><i>Dustfall monitoring stand, June 2025.</i></p>
	<p>Part 2: Traditional Knowledge and Inclusion of Aboriginal Groups</p> <p>The developer will engage and consider the advice of Nahanni Butte Dene Band, Liidlii Kué First Nation, and Dehcho First Nations, and consider all available Traditional Knowledge when developing its monitoring programs.</p> <p>To the extent possible, the developer will involve potentially-affected Aboriginal groups, including Nahanni Butte Dene Band, Liidlii Kué First Nation, and Dehcho First Nations, in the implementation of the developer’s monitoring programs.</p>	<ul style="list-style-type: none"> ▪ There are a number of ways that CZN considers and involves potentially affected groups. These include but are not limited to the following: <ul style="list-style-type: none"> ○ Early engagement on management plans; ○ Support on the various field programs (example is the 2024 archaeology investigation program); ○ Through Dene Monitor (DM) oversight as per the Environmental Agreement; ○ As per sections of the approved management plans;

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		<ul style="list-style-type: none"> ○ As per conditions within the authorizations that require Traditional Knowledge (TK or DK) to be considered and included in the Project; and ○ As per the approved Engagement Plan.
Measure 15-2: Annual Reporting from the Developer	<p>In order to demonstrate how measures are being implemented and to evaluate the effectiveness of the developer's efforts to prevent or minimize impacts on the environment, the developer will, throughout all phases of the development, prepare an annual Report on the Implementation of Measures. The Report will address the measures that the developer is responsible for and will:</p> <ul style="list-style-type: none"> i. Describe the actions, including actions implemented through adaptive management, being undertaken to implement the measures. ii. Evaluate how effective the implementation actions are in controlling, reducing, or eliminating the impact (considering the results of monitoring programs and adaptive management frameworks). Where applicable, provide references to further information contained in other management plans or monitoring reports. <p>The developer will provide a copy of this annual report to the Review Board by June 30 of each year, following the commencement of construction of the Project.</p> <p>The developer will also report in person annually, in a culturally appropriate way, to Nahanni Butte Dene Band, Liidlii Kué First Nation, and Dehcho First Nations.</p>	<ul style="list-style-type: none"> ▪ CZN is submitting this report in fulfillment of Measure 15-2. ▪ Work has been primarily related to follow up activities on the Geochemical Verification plan and water monitoring triggers; There has been no adaptive management applied to date to report on.
Measure 15-3: Annual Reporting from Government and Regulatory Authorities	<p>In order to evaluate the effectiveness of mitigation measures for the protection of the environment, each regulatory authority or government that is wholly or partly responsible for implementation of any measure in this Report of EA will prepare an annual Report on Implementation of Measures. The Report will:</p>	<ul style="list-style-type: none"> ▪ CZN is not responsible for this Measure.

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	<p>a) describe the actions being undertaken to implement the measures or the part(s) of the measures for which the regulatory authority or government is responsible; and</p> <p>b) explain how these actions, including those implemented through adaptive management, fulfill the intent of the EA measures, including consideration of the following questions:</p> <ol style="list-style-type: none"> i. How are implementation actions addressing a likely significant adverse impact on the environment? ii. How effective are implementation actions at reducing, controlling, or eliminating the impact or its likelihood? <p>Government and regulators will provide a copy of this annual report to the Review Board by June 30 of each year.</p>	 <p style="text-align: center;"><i>Mountain top Weather Station, 2025.</i></p>
Measure 15-4: Support Aboriginal Monitoring initiatives	<p>To help prevent significant adverse impacts on the environment and on Aboriginal rights, the developer will support, to the greatest extent practicable, independent monitoring of the Project area through monitoring initiatives undertaken by Nahanni Butte Dene Band, Liidlii Kúé First Nation, and Dehcho First Nations. The developer will provide access to the All Season Road for these Aboriginal groups to conduct their monitoring activities throughout all phases of the Project, whenever it is safe to do so. The developer will also provide in-kind support for independent community monitors to conduct their monitoring activities (e.g., accommodations, meals, transportation and appropriate safety training to operate on the road).</p>	<p>In August of 2022, CZN, Nahæâ Dehé Dene Band (NDDB), and Łíídlıı Kúé First Nation (LKFN) signed an Environmental Agreement (the Agreement). Primarily, the Agreement establishes an Environmental Committee (EC) made up of representatives from each of the three signatories. The EC exists to promote an effective working relationship between the signatories and to coordinate the ongoing participation of all parties in decisions and management of the Project (includes both the All Season Road and the Prairie Creek Mine).</p> <p>The Agreement is confidential. It allows for there to be participation (by Dene Monitors or DMs) in the day-to-day monitoring of the activities of the Project and observing activities in context as they happen. TK/DK can be provided as appropriate. There are also provision(s) for reporting on monitoring for the Project to the EC.</p>
<i>Suggestion 15-1: Systemic Adaptive</i>	<p>The Board encourages the developer to incorporate adaptive management principles (e.g., action levels, management responses, etc.), based on Appendix B of this report,</p>	<ul style="list-style-type: none"> ▪ CZN is not responsible for this Suggestion.

PRAIRIE CREEK ALL SEASON ROAD EA 1415-01 ANNUAL REPORTING

Measure (Party responsible is CZN unless otherwise indicated)		Status (as of December 31, 2025)
<i>Management in all Applicable Plans</i>	into all relevant management plans and monitoring programs. The Review Board encourages regulators to consider these adaptive management principles when setting regulatory requirements and when reviewing and approving management plans and monitoring programs.	<ul style="list-style-type: none"> ▪ Adaptive management is part of the requirement(s) within the Land Use Permits and Water Licences for all of the management plans.
<i>Suggestion 15-2: Public Review Process for Regulatory Authorizations and Plans</i>	The Review Board strongly encourages all regulators to provide opportunities for engagement of Aboriginal groups in review of authorizations and related management and monitoring plans for the Project. (For example, the Mackenzie Valley Land and Water Board’s standard practice is to request input from Aboriginal groups and other interested or affected parties on all regulatory decisions).	<ul style="list-style-type: none"> ▪ CZN is not responsible for this Suggestion.
<i>Suggestion 15-3: Regulatory Coordination, Including Coordination of Public Registries</i>	<p>The Review Board encourages all regulatory authorities to take a coordinated approach, to the extent practicable, to minimize duplication and promote consistency.</p> <p>The Review Board suggests that Parks Canada investigate sharing the Mackenzie Valley Land and Water Board’s public registry or developing a coordinated registry for regulatory documents related to the Project.</p>	<ul style="list-style-type: none"> ▪ CZN is not responsible for this Suggestion. CZN wants to see that the regulatory authorities continue to work together in a coordinated way on decisions and on timelines for the ease of all parties and so as not to contribute to additional work, confusion or delays.
<i>Suggestion 15-4: Expand the Mandate of the TAC</i>	<p>The Review Board suggests that the mandate and activities of the TAC be expanded, such that the TAC can design and approve its own Terms of Reference, including consideration of:</p> <ol style="list-style-type: none"> i. the frequency, objectives and scope of site visits; and ii. input into adaptive management frameworks including setting appropriate and protective action levels; iii. ways the TAC can support or compliment the Aboriginal monitoring initiatives referred to in Measure 15-4, such as: <ul style="list-style-type: none"> ○ ensuring that Traditional Knowledge is collected and used appropriately, ○ sharing resources, and <p>providing a venue for addressing community concerns and reporting to communities.</p>	<ul style="list-style-type: none"> ▪ See Measure 15-4. ▪ The TAC has essentially been replaced by the Environmental Committee.