



ALAMOS GOLD INC.
LYNN LAKE

Lynn Lake Gold Project
Annual Compliance Report

Year 2023

March 18, 2024

Executive Summary

Alamos Gold Inc. (“Alamos” or the “Company”) is required to submit an annual report detailing its compliance with the conditions outlined in the Decision Statement for the Lynn Lake Gold Project (“LLGP” or the “Project”), issued under Section 54 of the *Canadian Environmental Assessment Act, 2012*. Though there was no internal construction decision in 2023, Alamos remains committed to meeting all regulatory requirements, including those described in the Decision Statement.

During the 2023 calendar year, no Project activities occurred, meaning there were no Project-related compliance activities in effect during the year. However, proactive measures such as establishing the LLGP’s Environmental Advisory Committee (started in October 2023, with ongoing quarterly meetings since) demonstrate Alamos’ commitment to meaningful engagement with those Indigenous Nations engaged on the Project.

Annual updates to required management and monitoring plans and modifications to mitigation measures were not applicable in 2023 due to the absence of finalized initial plans and activities.

In summary, this 2023 Annual Compliance Report underscores Alamos' commitment to environmental stewardship and Indigenous engagement, despite the absence of construction activities during the reporting period.

Résumé Exécutif

Alamos Gold Inc. (« Alamos » ou « la société ») est tenue de présenter un rapport annuel qui explique la façon dont la société satisfait aux conditions énoncées dans la déclaration de décision pour le projet aurifère de Lynn Lake (PALL ou « le projet »), émise aux termes de l’article 54 de la Loi canadienne sur l’évaluation environnementale (2012). Bien qu’il n’y ait pas eu de décision de construction interne en 2023, Alamos tient résolument à respecter toutes les exigences réglementaires, y compris celles décrites dans la déclaration de décision.

Au cours de l’année civile 2023, aucune activité liée au projet n’a été réalisée, ce qui signifie qu’aucune activité de conformité liée au projet n’a été mise en œuvre durant l’année. Cependant, des mesures proactives, telles que la mise sur pied du Comité consultatif de l’environnement du PALL (lancé en octobre 2023, et la tenue de réunions trimestrielles depuis) montrent l’engagement d’Alamos à consulter de manière concrète les Nations autochtones prenant part au projet.

La mise à jour annuelle des plans de gestion et de surveillance requis et la modification des mesures d’atténuation ne s’appliquaient pas en 2023 en raison de l’absence de plans et d’activités initiaux finalisés.

En résumé, le rapport annuel de conformité de 2023 souligne l’engagement d’Alamos en matière de gestion de l’environnement et de consultation des Autochtones, malgré l’absence d’activités de construction pendant la période visée par le rapport.

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1. Concordance Table

This concordance table summarizes the compliance status and actions taken or not taken with respect to each condition outlined in the Decision Statement, to be reported on an annual basis for the Project by Alamos.

| Condition | Condition Description <i>(Extract from the Decision Statement)</i> | Alamos' Action Description |
|---------------|---|--|
| Condition 2.1 | <p>The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge available at the time the Proponent takes action, including policies, guidelines and directives and community and Indigenous knowledge, are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies.</p> | <p>No construction decision has been made, thus no actions to report. Alamos commits to fulfilling this condition once the Project progresses.</p> |
| Condition 2.5 | <p>The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, determine, as part of the development of each follow-up program and in consultation with Indigenous groups and any other parties being consulted during the development, the following information, unless otherwise specified in the condition:</p> <ul style="list-style-type: none"> • 2.5.1 the methodology, location, frequency, timing, and duration of monitoring associated with the follow-up program; • 2.5.2 the scope, content and frequency of reporting of the results of the follow-up program to the parties consulted for the development of the follow-up program; • 2.5.3 the minimum frequency at which the follow-up program must be reviewed and, if necessary, updated; • 2.5.4 the levels of environmental change relative to baseline that would require the Proponent to implement modified or additional mitigation measure(s), including instances where the Proponent may require Designated Project activities causing the environmental change to be stopped; • 2.5.5 the technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change referred to in condition 2.5.4 have been reached or exceeded; and | <p>No follow-up programs have been initiated due to the absence of Project activities. Follow-up programs encompass various environmental and socio-economic aspects, which will be reported comprehensively in future when Project construction begins.</p> |

| Condition | Condition Description <i>(Extract from the Decision Statement)</i> | Alamos' Action Description |
|-------------------------------------|---|---|
| | <ul style="list-style-type: none"> 2.5.6 the specific and measurable end points that must be achieved before the follow-up program can end. Those end points should indicate that the accuracy of the environmental assessment has been verified and/or that the mitigation measures are effective. | |
| Condition 2.8 | <p>The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement:</p> <ul style="list-style-type: none"> 2.8.1 implement the follow-up program according to the information determined pursuant to condition 2.5; 2.8.2 conduct monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure; 2.8.3 determine whether modified or additional mitigation measure(s) are required based on the monitoring and analysis undertaken pursuant to condition 2.8.2; 2.8.4 if modified or additional mitigation measure(s) are required pursuant to condition 2.8.3, develop and implement these mitigation measure(s) as soon as feasible and monitor them pursuant to condition 2.8.2. The Proponent shall notify the Agency in writing within 48 hours of any modified or additional mitigation measure being implemented. If the Proponent implements any additional or modified mitigation measure not previously submitted to the Agency pursuant to condition 2.5, the Proponent shall submit a detailed description of the measure(s) to the Agency within 7 days of their implementation; and 2.8.5 report all results of the follow-up program to the Agency no later than March 31 following each reporting year during which the follow-up program is implemented and, subject to information determined pursuant to 2.5.2, to the parties being consulted during the development of the follow-up program. | <p>No follow-up programs or plans have been finalized; thus, no modifications or additional mitigation measures are being proposed or implemented. Follow-up programs will be implemented as required once Project activities commence.</p> |
| Condition 2.10 and Condition 2.10.1 | <p>The Proponent shall prepare an annual report for each reporting year that sets out:</p> <ul style="list-style-type: none"> 2.10.1 the activities undertaken by the Proponent to comply with each of the conditions set out in this Decision Statement; | <p>This Annual Compliance Report structure follows the reporting requirements to satisfy this condition.</p> |

| Condition | Condition Description <i>(Extract from the Decision Statement)</i> | Alamos' Action Description |
|------------------|---|---|
| Condition 2.10.2 | <p>The Proponent shall prepare an annual report for each reporting year that sets out:</p> <ul style="list-style-type: none"> • how the Proponent complied with condition 2.1; | <p>No Project construction decision has yet been made; therefore, there are no specific actions to report regarding compliance with Condition 2.1. Alamos commits to comprehensive documentation of adherence to Condition 2.1 once construction activities commence.</p> |
| Condition 2.10.3 | <p>The Proponent shall prepare an annual report for each reporting year that sets out:</p> <ul style="list-style-type: none"> • for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation, and the resources provided to support their participation in consultation activities; | <p>No Project consultation (engagement) activities have been conducted with respect to the conditions due to the absence of finalized plans. However, the establishment of an Environmental Advisory Committee (EAC) in October 2023 (with quarterly meetings thereafter) demonstrates commitment to meaningful engagement with the Indigenous Nations engaged on the Project, in alignment with Condition 8.1.</p> |
| Condition 2.10.4 | <p>The Proponent shall prepare an annual report for each reporting year that sets out:</p> <ul style="list-style-type: none"> • the information referred to in conditions 2.5 and 2.8 for each follow-up program; | <p>There are no results to report due to absence of Project activities. Follow-up programs mandated under various conditions described in the Decision Statement will be comprehensively reported in future.</p> |
| Condition 2.10.5 | <p>The Proponent shall prepare an annual report for each reporting year that sets out:</p> <ul style="list-style-type: none"> • a summary of the available results of the follow-up program requirements identified in conditions 3.12, 3.13, 3.14, 3.15, 4.5, 4.6, 6.3, 6.4, 6.5, 9.3, 10.5 and 12.2; | <p>There are no results of follow-up programs to report, due to the absence of Project activities and non-finalization or submission of any plans.</p> |
| Condition 2.10.6 | <p>The Proponent shall prepare an annual report for each reporting year that sets out:</p> <ul style="list-style-type: none"> • for any plan that is a requirement of a condition set out in this Decision Statement, any update(s) to the plan that have been made during the reporting year; and | <p>There have been no updates to required plans due to the absence of Project activities and non-finalization or submission of any plans.</p> |
| Condition 2.10.7 | <p>The Proponent shall prepare an annual report for each reporting year that sets out:</p> <ul style="list-style-type: none"> • any modified or additional mitigation measure implemented or proposed to be implemented by the Proponent, as determined pursuant to condition 2.8. | <p>There are no modified or additional mitigation measures proposed or implemented due to the absence of Project activities and non-</p> |

| Condition | Condition Description <i>(Extract from the Decision Statement)</i> | Alamos' Action Description |
|---------------|---|--|
| | | finalization or submission of follow-up programs and plans. |
| Condition 8.1 | <p>The Proponent shall establish, prior to construction and in consultation with Indigenous groups, and maintain, during all phases of the Designated Project, an Indigenous Environmental Advisory Committee (IEAC) related to ongoing Designated Project activities, including land use planning, and the development and implementation of follow-up programs, and mitigation measures. The Proponent shall invite Indigenous groups to engage in all IEAC activities, and shall consult participating Indigenous groups on the development of Terms of Reference for the IEAC. The Proponent shall strive to reach consensus on the Terms of Reference with participating Indigenous groups. The Proponent shall submit the final Terms of Reference to the Agency. As part of the Terms of Reference, the Proponent shall include:</p> <ul style="list-style-type: none"> • 8.1.1 the means by which the Proponent and Indigenous groups shall jointly identify topics to be discussed by the IEAC and the means by which the Proponent shall document these topics and discussions; • 8.1.2 the frequency, timing and location of IEAC meetings during each phase of the Designated Project and the means by which the Proponent shall document meeting minutes and shall seek approval of the meeting minutes by Indigenous groups; • 8.1.3 the means by which the Proponent shall share with the IEAC the following information, including when and how this information will be shared: <ul style="list-style-type: none"> ○ 8.1.3.1 opportunities for participating in ongoing Designated Project activities, including land use planning, and the development and implementation of follow-up programs and mitigation measures; ○ 8.1.3.2 opportunities for providing feedback on effects to cultural heritage, in accordance with condition 7.2, and how feedback will be addressed; ○ 8.1.3.3 the results of the follow-up programs, including any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent as a result of each follow-up requirement; and | <p>Although no Project construction decision has been made, proactive steps such as the establishment of an Environmental Advisory Committee (EAC) occurred in 2023, and Alamos' ongoing engagement with the Indigenous Nations engaged on the Project reflect our commitment to meaningful consultation, in accordance with this condition.</p> <p>A draft Terms of Reference for the EAC was also shared with Indigenous Nations engaged on the Project, which was circulated for input and finalised in early 2024. The Terms of Reference satisfies the conditions described in 8.1.1 – 8.1.4.</p> |

| Condition | Condition Description <i>(Extract from the Decision Statement)</i> | Alamos' Action Description |
|-----------|---|----------------------------|
| | <ul style="list-style-type: none"> ○ 8.1.3.4 other information as determined by the IEAC; and ● 8.1.4 the means by which the Proponent shall evaluate, in consultation with Indigenous groups, the Terms of Reference to determine whether administrative or management improvements are required to increase the efficiency and effectiveness of the IEAC. | |

2. Introduction

Alamos is required to submit an annual report for each reporting year (i.e., January 1 – December 31). The first reporting year starts on the day the Minister of Environment issues the Decision Statement. In 2023, Alamos received the necessary provincial (March 6, 2023; Environment Act Licences No. 3391 [MacLellan site] and No. 3390 [Gordon site]) and federal (Impact Assessment Agency of Canada [IAAC], Decision Statement, March 5, 2023) environmental approvals for the LLGP.

This Annual Compliance Report will be updated each year to describe Alamos' compliance with the conditions outlined in the Decision Statement, including activities undertaken, compliance with specific conditions, consultation (engagement) efforts, follow-up program information, results summaries, updates to required management and monitoring plans, and any modified or additional mitigation measures proposed or implemented.

During the 2023 year, Alamos did not make an internal decision to construct the Project and there have been no activities as described in the Project Description (PD) and the Environmental Impact Statement (EIS) for the LLGP.

Project design work remains ongoing (including development of management and monitoring plans) with construction at the MacLellan site estimated to begin in the year 2025.

Considering the absence of a construction decision or any related activity, Project activities undertaken during the year to comply with the conditions set out in this Decision Statement were limited to the establishment of an Environmental Advisory Committee (EAC). There are no other compliance activities to report for the year 2023.

3. Annual reporting

This Annual Compliance Report is structured following the reporting requirements as outlined in Condition 2.10 of the Decision Statement.

3.1. Activities undertaken to comply with the Decision Statement as per Condition 2.10.1

Given the absence of a Project construction decision or any related activity, activities undertaken by Alamos during the 2023 year to comply with the conditions set out in the Decision Statement were limited to the establishment of an EAC, as outlined in Section 3.3 below. There are no other compliance activities to report for the 2023 year. However, Alamos is committed to fulfilling its obligations as outlined in Condition 8.1, despite not yet reaching a construction decision.

3.2. Compliance with condition 2.1 as per Condition 2.10.2

As of the present time, there has been no Project construction decision made, and consequently, no work has been initiated. Therefore, with the exception of establishing an EAC, there are no specific actions to report in relation to Condition 2.1 of the Decision Statement. However, Alamos remains committed to fulfilling this and other conditions diligently once the project progresses to the appropriate phase. Alamos will ensure that all actions taken during the designated project are conducted in accordance with the principles outlined in Condition 2.1. This includes careful and precautionary consideration for all phases, promotion of sustainable development, utilization of the best available information and knowledge, adherence to recognized methods and models, engagement of qualified individuals, and implementation of economically and technically feasible technologies. Upon commencement of activities, Alamos will provide comprehensive documentation detailing adherence to Condition 2.1 throughout the project lifecycle.

3.3. Consultation (Engagement) Compliance as per Condition 2.10.3

Considering the absence of Project activities and the non-finalization or submission of any plans, there have been no consultation (engagement) activities to report on for the conditions specified in the Decision Statement.

However, Alamos is committed to fulfilling its obligations as outlined in Condition 8.1, despite not yet reaching a construction decision. The establishment of an Environmental Advisory Committee (EAC) in October 2023 has been undertaken proactively, reflecting our dedication to meaningful engagement with the Indigenous Nations engaged on the Project. The draft Terms of Reference for the EAC was shared with the EAC in 2023, and was finalised in 2024 following input from participating Indigenous Nations, in alignment with Condition 8.1's requirement for consultation (engagement).

In 2023, our first Environmental Advisory Committee meeting (held on October 23, 2023) saw active participation from various Indigenous Nations, including the Marcel Colomb First Nation, Mathias Colomb Cree Nation, Manitoba Métis Federation, Métis Nation – Saskatchewan, Nisichawayasihk Cree Nation, O-Pipon-Na-Piwin Cree Nation, and Peter Ballantyne Cree Nation. Despite not all Nations attending, meeting

minutes of the EAC gatherings are shared with all 13 Nations engaged on the Project, ensuring transparency and inclusivity in the decision-making process.

Moreover, Alamos maintains ongoing engagement with the Marcel Colomb First Nation, exemplified by the signing of a Benefit Agreement in June 2023. This agreement has led to the formation of additional subcommittees aimed at integrating Indigenous Knowledge across all aspects of the Project. As part of our agreement, Marcel Colomb First Nation reviewed a draft of this Annual Compliance Report and had no comments.

By establishing and actively involving Indigenous Nations in the EAC, Alamos is demonstrating its commitment to collaborative decision-making, cultural preservation, and environmental stewardship, in accordance with Condition 8.1.

3.4. Summary of Follow-up Program Information and Results as per Condition 2.10.4 and 2.10.5

Due to the absence of any Project activity, there are no results to report in accordance with Section 2.10.4 and Section 2.10.5 of the Decision Statement. Section 2.10.4 specifies the information required from follow-up programs under conditions 2.5 and 2.8, while Section 2.10.5 outlines the summary of available results for follow-up program requirements specified in conditions 3.12, 3.13, 3.14, 3.15, 4.5, 4.6, 6.3, 6.4, 6.5, 9.3, 10.5, and 12.2. As per Section 2.5 and 2.8, where follow-up programs are mandated, the Proponent is tasked with determining and implementing necessary measures. In the Project's current circumstance, there has been no such activity to report on.

Follow-up programs mandated encompass a range of environmental and socio-economic aspects. These include monitoring and addressing adverse effects on water quality, water quantity, fish habitat, and migratory birds, as well as mitigating acid rock drainage and metal leaching. Furthermore, they entail assessing impacts on air quality, country foods, socio-economic conditions, and health due to noise and vibration. Greenhouse gas emissions, effects on woodland caribou habitat ~~and survival~~, and changes in permafrost are also integral components. All findings and actions taken within these follow-up programs will be comprehensively reported as part of this annual reporting process.

Follow-up plans entail several central components. Under Section 2.5, the requirements include specifying:

- i. the methodology, location, frequency, timing, and duration of monitoring associated with the follow-up program;
- ii. the scope, content, and frequency of reporting the program results to relevant parties;
- iii. the minimum review frequencies;
- iv. the thresholds triggering modified or additional mitigation measures;
- v. the technically and economically feasible mitigation measures; and
- vi. the specific and measurable endpoints for program termination.

Under Section 2.8, adherence to the determined information from Section 2.5 is required, along with conducting monitoring and analysis to verify environmental assessment accuracy and mitigation measure effectiveness. If necessary, modified or additional mitigation measures must be promptly implemented

and monitored, with detailed reporting to the Impact Assessment Agency of Canada and relevant parties by March 31 of each reporting year.

3.5. Annual Updates to Required Plans as per Condition 2.10.6

Given the absence of Project activities and the non-finalization or submission of any management and monitoring plans, there is no engagement or relevant updates to report for the following plans mandated by the Decision Statement:

- i. an offsetting plan for mitigating residual effects on fish and fish habitat;
- ii. a protocol for inspecting and cleaning vehicles to limit the spread of weed species;
- iii. a protocol for addressing noise and vibration feedback;
- iv. an archaeological and heritage resource management plan;
- v. a greenhouse gas management plan;
- vi. an accidents and malfunctions response plan; and
- vii. a communication plan for accidents and malfunctions.

Therefore, there are no updates to any of these plans during the reporting year as required by Section 2.10.6.

3.6. Modified Mitigation Measures as per Condition 2.10.7 and in compliance with Condition 2.8

Due to the absence of Project activities and the non-finalization or submission of any follow-up programs and plans, there have been no modified or additional mitigation measures implemented or proposed by the Project as determined pursuant to condition 2.8 of the Decision Statement. Condition 2.8 mandates the implementation of follow-up programs where required, as specified in the earlier provided list of plans. As there have been no activities or finalized plans, there are no such modifications or additions to report during the 2023 reporting year, in accordance with Section 2.10.7.

4. Conclusion

This Annual Compliance Report for 2023 reaffirms Alamos' strong commitment to environmental stewardship, Indigenous partnership, and regulatory adherence. Despite the absence of construction activities during this period, Alamos has made proactive steps including the establishment of the Environmental Advisory Committee, demonstrating our commitment to sustainable practices and inclusive decision-making. As we move towards project execution and construction, we remain determined in our commitment to meeting regulatory standards while fostering positive relationships with all stakeholders involved in the LLGP.