

Tailings Management Improvement Plan

Tacora's Scully Mine facility is working towards achieving Level A for Indicators 1, 2, and 3 of the Tailings Management Protocol, with the goal of achieving Level A in 2025. To address these gaps, Tacora's has outlined specific actions in Tables 1, 2 and 3 below.

Table 1 Indicator 1 – Tailings Management Policy and Commitment

Level	Requirement Description	Achieved? (Y/N)	Action Plan	Schedule
Indicator 1 Level B	1. Has the company developed a policy and/or commitments that specifically address tailings management, but all requirements for a Level A are not met?	Y	N/A	N/A
	2. Has the company developed an action plan to meet all requirements for a Level A?	Y	N/A	N/A
Indicator 1 Level A	1. Has an internal audit been conducted and determined that:			
	a. The policy and/or commitments are:			
	i. In conformance with Version 3.2 of the Tailings Guide	Y	N/A	N/A
	ii. Approved by senior management?	Y	N/A	N/A
	iii. Endorsed at the governance level?	N/A	N/A	N/A
	b. The company has a process in place to ensure that the policy and/or commitments are:			
	i. Communicated to employees?	Y	N/A	N/A

Indicator 1 Level A	ii. Understood to a degree appropriate to their roles and responsibilities by employees, contractors, and consultants whose activities may affect tailings management either directly or indirectly?	N	Tacora currently has roles and responsibilities defined in the OMS Manual and will be completing a review of other documentation to ensure the roles and responsibilities are well defined and consistent throughout all company documentation.	Q3 2025
	iii. Implemented with budget allocation?	Y	N/A	N/A

Table 2 Indicator 2 – Assigned Accountability and Responsibility for Tailings Management

Level	Requirement Description	Achieved? (Y/N)	Action Plan	Schedule
Indicator 2 Level B	1. Has the company defined and documented accountability and responsibility for tailings management, but not met all requirements for a Level A?	Y	N/A	N/A
	2. Has the company developed an action plan to meet all requirements for a Level A?	Y	N/A	N/A
Indicator 2 Level A	1. Has an internal audit (using Table of Conformance 2022 version) been conducted and determined that the following requirements have been met?			
	a. Has the Board or Governance Level assigned accountability for tailings management to an Accountable Executive Officer?	N	Throughout 2024, Tacora experienced some changes in personnel at the executive level. During 2025, Tacora will ensure documentation is updated to reflect updated accountabilities and any reallocations of responsibilities due to these changes.	Q1 2025

Indicator 2 Level A	b. Does the Accountable Executive Officer have a direct reporting relationship with the Board, a Board committee, or the Governance Level?	Y	N/A	N/A
	c. Has the company delegated responsibility and authority for tailings management in writing to qualified personnel?	Y	N/A	N/A
	d. Has the company delegated responsibility and authority for tailings management in conformance with the Tailings Guide (Version 3.2)?	Y	N/A	N/A

Table 3 Indicator 3 – Tailings Management System and Emergency Preparedness

Level	Requirement Description	Achieved? (Y/N)	Action Plan	Schedule
Indicator 3 Level B	1. Has the company:			
	a. Developed and implemented a tailings management system, but that system is not in conformance with the Tailings Guide (V. 3.2)?	Y	N/A	N/A
	b. Conducted a gap analysis comparing existing tailings management practices against the Tailings Guide and determined that existing practices are not in conformance with the Tailings Guide (V. 3.2)?	N	Update is required for the following documents: Risk Registry, OMS Manual, and Emergency Response Plan.	Q2 2025
	2. And has the company:			
	a. Developed an ERP and an EPP for the tailings facility but both plans are not in conformance with the Tailings Guide?	N	Tacora has engaged Hatch to update the ERP to address specific deficiencies.	Q2 2025

I Indicator 3 Level B	b. Developed an ERP and an EPP that are in conformance with the Tailings Guide but both have not been tested?	N	N/A	N/A
	3. Has the company developed an action plan to meet all requirements for a Level A?	Y	N/A	N/A
Indicator 3 Level A	1. Has an internal audit been conducted and determined that the company has:			
	a. Developed and implemented a tailings management system in conformance with the Tailings Guide?	Y	N/A	N/A
	b. Developed an ERP and an EPP that are both in conformance with the Tailings Guide?	N	Tacora has engaged Hatch to update the Emergency Response Plan to address specific deficiencies. This document combines both ERP and EPP. It should be noted that separate ERP and EPP documents have not been warranted considering the existing Tailings Facility has a “significant consequence” classification under the CDA Dam Safety Guidelines.	Q2 2025
	c. Tested both the ERP and the EPP?	N	Tacora will conduct an internal test for the ERP after the document has been updated.	Q2 2025