



KSM MINING ULC

A SUBSIDIARY OF SEABRIDGE GOLD INC.

KSM PROJECT COVID-19 SAFETY PLAN

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Tim Dodd- Mine Manager

t.dodd@seabridgegold.net

106 FRONT STREET EAST, SUITE 400, TORONTO, ONTARIO M5A 1E1 CANADA

TEL. 416-367-9292 FAX. 416-367-2711 WWW.SEABRIDGEGOLD.NET

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1.0 Introduction:

The objective of the Covid-19 Safety Plan is to provide a safe work environment and to minimize the infection and transmission risk of Covid-19 to employees, contractors, and local communities. This document outlines Covid-19 protocols that KSM Mining ULC (A subsidiary of Seabridge Gold) has implemented to prevent the transmission of COVID-19 at the KSM Project. The document will be updated as necessary as new information becomes relevant.

The KSM Project is in Northwest BC, approximately 65 kilometers North of Stewart and is located in Tahltan and Nisga'a traditional territory. The KSM camp is located in a remote location, accessible by helicopter only, with a normal capacity of approximately 50 people. This plan has been developed in accordance with the British Columbia Ministry of Health guidelines for the Natural Resource sector, Ministry of Energy, Mines and Petroleum Resources and WorkSafe BC. This plan will be submitted to the Tahltan Nation '3 Nations Covid-19 Pandemic Team' and Nisga'a prior to camp opening.

As the pandemic and guidance related to the pandemic evolve, this document will be updated regularly by the Iskut Project based Health and Safety Officer for SnipGold (also a Seabridge Gold subsidiary), under the direction of the KSM Mine Manager. According to WorkSafe BC and the Ministry of Energy, Mines and Petroleum Resources and Tahltan Nation, this plan will be made available to employees, posted at the KSM Camp and posted on the company website.

This policy outlines the minimum requirements for KSM Mining staff, contractors, and employees. KSM Mining requires that each contractor working at the KSM camp also have a Covid-19 Plan and Standard Operating Procedure (SOP) for their work area. This KSM Mining policy outlines minimum requirements that all contractors must comply.

Additional Covid-19 SOP information relevant to camp operation from our subcontractors can be found in the appendixes to this document.

2.0 Background on COVID-19:

Taken from Ministry of Health guidelines

What is COVID-19 and how is it spread?

- Coronaviruses are a large family of viruses found mostly in animals. In humans, they can cause diseases ranging from the common cold to more severe diseases such as Severe Acute Respiratory Syndrome (SARS) and Middle East Respiratory Syndrome (MERS).
- The disease caused by the new coronavirus has been named COVID-19.

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- COVID-19 has been declared a global pandemic.
- COVID-19 is a reportable disease and the local Medical Health Officer must be notified if there is an outbreak or suspicion of an outbreak.
- Coronavirus is transmitted via liquid droplets when a person talks, coughs or sneezes. The virus can enter through these droplets through the eyes, nose or throat if you are in close contact.
- The virus is not known to be airborne (e.g. transmitted through the particles floating in the air) and it is not something that comes in through the skin.
- It can be spread by touch if a person has used their hands to cover their mouth or nose when they cough. That's why it is recommended to cough or sneeze into your elbow and wash your hands regularly.

What are the symptoms of COVID-19?

- The symptoms of COVID-19 are similar to other respiratory illnesses, including the flu and the common cold. These symptoms include cough, sneezing, fever, sore throat and difficulty breathing. Additional symptoms may include muscle aches, fatigue, headache, loss of appetite, chills, runny nose, nausea and vomiting, diarrhea, loss of sense of smell or taste.
- People infected with COVID-19 may experience little or no symptoms, with illness ranging from mild to severe.
- Some people are more vulnerable to developing severe illness or complications from COVID-19, including older people and those with chronic health conditions.

3.0 Responsibilities

The **KSM Mine Manager** is responsible to ensure the overall health and safety of operation and to ensure the [Health, Safety and Reclamation Code for Mines in British Columbia](#) is implemented, and to ensure the KSM Camp Covid-19 Safety Plan is complete, and implemented by all employees, personnel and contractors. All contractors, employees, and personnel report to the Mine Manager. The Mine Managers for the 2020 season will be Timothy Dodd and Kevin Hidber.

The **KSM OFA3 (Occupational First Aid Level 3)** reports to the Mine Manager, and works with the Iskut Project based Health and Safety Officer, and is responsible for the overall implementation of the KSM Mining Covid-19 Safety Plan, to ensure the KSM Camp Covid-19 Safety Plan is understood, to ensure procedures outlined are followed and ensure that workers have been trained in all procedures required to establish safe practices preventing **COVID-19** transmission.

Employees are responsible to ensure that they understand the KSM Camp Covid-19 Safety Plan, follow procedures set out in the SOP, report all unsafe work conditions and health issues.

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Contractors are responsible to read and understand the KSM Camp Covid-19 Safety Plan and follow procedures set out in the Safety Plan. Contractors are responsible to establish safe practices preventing **COVID-19** transmission Standard Operating Procedures (SOP's) for their work areas (Appendix 1, 2 and 3), ensure all their employees are familiar with the SOP, ensure that their workers have been trained in all procedures required to establish safe practices preventing **COVID-19** transmission, and ensure all their personnel understand the emergency procedures as it relates to **COVID - 19**.

4.0 Safety Planning

Following the guidelines outlined by WorkSafe BC, each employer is required to have a Covid-19 Safety plan and include the following six main sections:

- Step 1: Assess the risks
- Step 2: Implement protocols to reduce the risk
- Step 3: Develop policies
- Step 4: Develop communication plans and training
- Step 5: Monitor the workplace and update the plan as necessary
- Step 6: Assess and address risks from resuming operations

4.1 Assessing the Risks

KSM Mining conducted a risk assessment of normal course camp operations, and due to the recent pandemic, identified the following risks that Covid-19 could pose to normal course operations.

1. Staff travel to and from camp
2. Shared accommodations, due to common camp arrangements;
3. Shared common areas, such as cafeteria style eating areas;
4. Close working environments where social distancing is not possible (i.e. drill rigs); and helicopters
5. Isolated location away from hospitals.

Protocols to reduce these risks (Section 4.2) and KSM Camp policies and procedures (Section 4.3) to minimize the risks that Covid-19 poses to camp operations are discussed below.

4.2 Protocols to Reduce Risks

Following the identification of Covid-19 risks that could occur in normal exploration camp environment, the following protocols were implemented by KSM Mining to reduce the risks of Covid-19. KSM Mining postponed the start of camp operations to ensure that necessary Covid-19

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guidelines had been received, and until BC entered Phase 2 of BC's Restart Plan. KSM Mining postponed aspects of the planned field season to minimize the number of people in camp and minimize the number of personnel traveling to and from camp, thus enabling single occupancy rooms, and allow social distancing in common areas (such as scheduled and separate break and meal times). All visitors have been restricted from camp, except for extenuating circumstances, however, extenuating circumstances can only be approved by the Mine Manager. No staff will enter isolated Northern Communities on their travels to and from site, unless said community is their home community.

Crew rotations have been altered to a 3-week on, 3-week off rotation, from a typical 2-week rotation. According to Harvard Heath (2020), the time from Covid-19 exposure to symptom onset (known as the incubation period), is 3 to 14 days, though symptoms will typically appear 4 to 5 days after. The 3-week crew shift will reduce the risk that if anyone contracts the virus, it will be evident before their shift ends and before they travel to their home communities/cities. In addition, there will be no overlap between work shifts. All personnel (staff, employees, contractors etc.,) will be permitted to enter on Day 1 for their 3- week rotation, no new staff will be permitted to enter during that time unless there is a health emergency where individuals need immediate medical attention and removal from site.

Performing frequent hand washing has been shown to be one of the most effective preventive measures from Covid-19. Additional handwashing and hand sanitizing stations will be set up at camp and common areas, as well as educating staff on the proper handwashing techniques. Posters on hand washing will be posted in each washroom and in the camp kitchen (Appendices 1 & 3).

An additional first aid protocol will be implemented for the 2020 field season. In the event of an employee experiencing Covid-19 symptoms or other medical emergency, Summit Helicopters has been contracted to provide medivacs in the event it is required. This medical service is in addition to the full- time level 3 first aid attendant employed at camp.

4.3: KSM Camp Policies

Work Schedule

The KSM project will run on a 3-week rotation during the 2020 season. Since the 3- week rotation exceeds the incubation period of the virus, it can be assumed that the risk of Covid-19 transmission in camp and spreading it to local communities has been lowered. Staff are expected to arrive at their pick-up destination one day prior to their arrival in camp.

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Prior to Arrival at Project

All personnel must obey their local government guidelines and follow best practices with regards to social distancing prior to travel to site. A questionnaire will be sent to staff prior to their arrival at site (Appd 5). During travel to the project, personal masks must be worn in scenarios where social distancing is not possible (for example air travel). Anyone that has had symptoms of Covid-19 in the last 10 days, including fever, chills, new or worsening cough, shortness of breath, sore throat, new muscle aches or headaches are prohibited from entering camp.

Staff from Terrace, Smithers and Northern Areas

Staff from Terrace and Smithers should be expected to be contacted by the KSM Mining OFA3 on the day prior to departure. A screening survey and temperature check will be conducted.

Staff from outside Northern BC

Staff from outside Northern BC will be expected to arrive on the flight to Terrace or Smithers the day prior to departure. They will be contacted by the KSM Mining OFA3 and a screening survey and temperature check will be conducted.

Travel to Camp and Crew Change

Travel to camp will be by Diversified Transportation in conjunction with North Coast Shuttles in a bus or van with sufficient spacing for social distancing. Staff are required to wear masks for the duration of this travel. Staff will disinfect the vehicles prior to use and when arriving at destination. Crew change via helicopter will be conducted as per the KSM Mining On Site Transportation/Helicopter policy described below.

During crew change the helicopter will be operated as per guidelines listed below (Appendix 2 – Summit Helicopters). If conversation with cross shift is deemed essential, there will be strictly enforced physical distancing of at least two meters. Due to the logistics of crew changes, changeover meetings should be planned as teleconferences prior to changeover.

Personal Practices

ALL workers are required to follow the practices as adapted from the Ministry of Health guidelines as described below.

Guidance for Handwashing

- Handwashing stations will be posted with signage that identifies their location,
- Handwashing is required periodically throughout the day and especially before and after break times, after using the washroom, or when workstations are changed, or tools are switched.

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- Hand washing instructions and reminders will be posted at all handwashing stations.
- When handwashing is not possible, hand sanitizer will be used.

Physical distancing

Physical distancing of at least 2 meters should always be maintained. Should this not be possible, in coordination with the KSM Mining OFA3 and Mine Manager, a work pod can be established for the duration of a rotation. 'Work pods' can be thought of like a family unit, this work pod will ensure close contact only occurs within a select small group. Designating workers to the same small working group or work pod for as long as practical can help reduce the risk of COVID-19 spreading to workers and others in the operation.

Tools and Equipment

Where possible, each worker should utilize only their own tools throughout the duration of their employment to minimize contact spread of COVID-19.

- Where it is not possible to provide personal tools, the shared tools and equipment must be wiped down and cleaned with a disinfecting agent such as disposable wipes or a diluted bleach solution between uses by different workers. Rubber gloves should be worn while handling bleach solutions and the area should be well ventilated.
- The KSM OFA3 will be responsible for training workers who share tools and aid workers to ensure compliance and understanding of handwashing and hygiene.
- Workers who use specialized PPE and are properly trained in its use (e.g. workers certified and trained to use PPE because of their normal work role) should not share their PPE with other workers. A labeling system to help with organization of this specialized equipment will be established.
- Workers will wear leather gloves or other impermeable gloves as hand protection during work.
- Workers wearing impermeable gloves may share tools and equipment without disinfecting the tools between each user but must continue to clean and wash hands to break the potential chain of infection. Assign and label leather gloves to ensure each pair remains with one worker and that each worker is disinfecting his gloves to limit infection transmission.

Operations in communal spaces

The following bullets offer advice on how to maintain physical distancing, decrease crowding, and reduce social interactions including maintaining small, and consistent groupings of people in work pods.

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- Start/stop times, breaks will be staggered where possible to minimize workers congregating.
- In-person meetings, and other gatherings are to be held in open spaces or outside.
- Worker gatherings of any size will be structured so that those present can maintain a physical distance of 2 meters from each other.
- Employees are required to wash hands: before and after breaks, after going to the washroom, and before preparing or eating food.
- If workers or staff are sick, they will be asked to self-isolate and not prepare or handle food for others, until it can be arranged for testing offsite, if required.
- Staff should practice respiratory etiquette: cough or sneeze into elbow sleeve.
- Dispose of tissues in garbage cans.
- Wash hands often with plain soap and water for at least 20-30 seconds or use an alcohol-based sanitizer with at least 60% alcohol content.
- Avoid touching one's face.

Accommodations

All personnel on site will be assigned an individual room space during the 2020 field season.

On site transportation

In situations where workers are required to travel together in helicopters to the work site, designated work pods will travel together where possible.

Vehicles

Proper precautions should be exercised when travelling to and from accommodation and work sites, including hand sanitizing and avoiding touching one's own face, maintaining physical distancing, cleaning and disinfecting high touch points like door handles, or headsets, and minimizing contact with crowds and public places. Safety protocols will be in place for workers who typically travel alone, including a reporting process to confirm whether they have made it to and from the site safely.

Cleaning Vehicles

At the start of each working day and throughout the day, drivers must clean and disinfect frequently touched surfaces in the vehicles using an alcohol-based cleaner or disinfecting wipes/spray and paper towel, and record in the vehicle log book; if these are unavailable, use soap and water.

High touch or key contact points include:

- door handles (inside and out)
- window buttons

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- steering wheel or handlebars and controls
- shifter
- grab handles, seat adjusters
- seat belt buckles
- radio and communication devices

Helicopters

Standard safety training by the pilot will be carried out prior to the initial use of a helicopter and this will include additional measures for preventing the spread of COVID-19. The pilot has final say with regards to practice and travel. As part of this orientation all passengers will be questioned and instructed by the pilot regarding (Appendix 2):

- Recent travel history.
- Screening for any COVID-19 symptoms or signs (this may include thermal screens, or questionnaires).
- Instruction on minimizing potential spread of COVID-19 while in flight.

To prevent the spread of COVID-19 while utilizing the helicopter:

- Number of passengers will be determined by the pilot and he will instruct on the seating arrangement.
- Passenger headsets will not be used unless absolutely necessary. In flight communication will be via hand signals where possible. If the headsets are used, they will be disinfected immediately after use.
- Personal protective equipment that must be used in flight, including and not limited to face masks, and eye protection that does not limit visibility. It is recommended that an individual be clean shaven to ensure masks work effectively.
- Work pods will be transported together throughout the entire duration of their shift/rotation, including arrival to camp and departure at end of rotation.
- Hand sanitizer with a minimum 60% alcohol must be used before entering and after exiting all aircrafts.
- Common surfaces in aircraft will be wiped down with disinfectant before and after each flight.

Summit Helicopter's SOP for preventing the spread of COVID-19 is attached for additional details (Appendix 2), including protocols and responsibilities for sanitization.

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Personal Accommodation

Personal accommodations are the responsibility of the occupant. It is imperative that the occupant keeps this area clean during their stay. Rooms will be sanitized following a changeover.

Communal Area Sanitisation Schedule

KSM Mining has contracted with Matrix Aviation and Logistics to run the camp and conduct regular sanitization as summarized below. Matrix is responsible for washrooms and dries, laundry facilities and workshops and between shift sanitizing details can be found in Appendix 1. KSM Mining has contracted TNDC/Sodexo to run the camp kitchen, detailed checklists for kitchen, dining room are provided below and in Appendix 3. Checklists will be posted in common areas as described for audits by the KSM OFA3.

Kitchen: The cleaning kitchen checklist (Appendix 3) will be used to sanitize the kitchen upon opening and after every meal prep

Dining Room: The dining room will be sanitized upon opening and after every meal service. This includes wiping down benches, tabletops, condiment bottles and surfaces that have a high contact percentage such as coffee pots handle etc.

Washrooms & Dries: The washrooms and dries will be sanitized 3 times a day. A spray bottle of Sanitation solution will be available for resident to spray the shower and sinks prior to their use. Residents are expected to spray and wipe down the shower and sink and toilet after each use.

Laundry Facilities: The laundry facilities will be sanitized upon opening and then twice a day during occupancy. A spray bottle of sanitation solution will be available for residents to wipe down the laundry machines before and after each use.

Workshops, Parts shed & Incinerator: All surfaces will be sanitized upon opening and will be wiped down with the sanitation solutions after every use

Dining room operations

The capacity of the dining room is estimated at 20 persons normally, so for social distancing criteria we will cut that in half. For each 3-week rotation a dining and break schedule will be set that allows for social distancing. Staff will be encouraged to eat outside when conditions permit.

- Kitchen staff will serve food to workers.
- All small food items and snacks will be individually wrapped whenever possible or made available with systems to prevent common touching of either food items or utensils.
- Only kitchen workers and supervisory staff shall be permitted to enter food preparation or storage areas

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- Signs shall be posted to limit the number of people permitted in the dining area and any other common areas.
- Meals will be delivered to the outside of rooms of any workers that are in isolation by kitchen staff.
- All workers must wash their hands immediately prior to entering any dining or food preparation area.
- Prior to the evening meal, the KSM Mining OFA3 will take and record the temperature of staff individually.
- All eating utensils and dishes shall be cleaned by designated kitchen or cleaning staff, according to the 4-step process outlined in the BC Guidelines for Industrial Camps Regulation, that includes pre-rinsing, washing, soaking in a bleach solution, and air-drying or in the dishwashing machine on site.

Self Isolation

Workers who develop common cold or influenza like illness or symptoms compatible with COVID-19 are required to remove themselves from the work environment and immediately report symptoms to the KSM Mine OFA3 and Mine Manager, while ensuring physical distancing of 2m or more. The KSM OFA3 will then contact the SnipGold Health and Safety Officer. Contact tracing and documentation will begin using Appendix 6.

- If a worker or contractor displays symptoms of COVID-19, they are required to begin self-isolation immediately. All other workers in their work pod will also be required to self-isolate
- The onsite first aid attendant will act as an immediate contact point for the patient. The patient(s) will be checked on a regular basis by the KSM OFA3 to ensure they are comfortable. Internet is available in the camp, so workers may communicate with employers, family members, and online medical advice during self-isolation.
- If health conditions worsen to the point where external help is required, the Mine Manager will initiate a medevac using an external helicopter if possible
- An outhouse will be clearly marked and set aside for anyone who is in isolation.
- Self-isolation should continue for a period determined by the Mine Manager in consultation with the OFA3 and the SnipGold Health and Safety Officer and a medical provider.
- In all cases, isolation must continue until a fever is gone without the use of fever-reducing medications, for example, Tylenol, Advil, AND symptoms improve – improvement in runny nose, sore throat, nausea, vomiting, diarrhea and fatigue.
- Any testing for COVID-19 will be done in accordance with the BCCDC's up-to-date guidance on COVID-19 testing protocols. If a worker tests positive for COVID-19, they must self-isolate for a minimum of 10 days from symptom onset AND ensure their symptoms, including fever, have completely resolved.
- If a worker tests negative for COVID-19, they must self-isolate until their common cold or influenza like symptoms have completely resolved.

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4.4 Communication Plans and Training

Communications Plans

Workers that develop common cold or influenza like illness or symptoms compatible with COVID-19, while already in camp, are required to remove themselves from the work environment and immediately report symptoms to the KSM OFA3 and Mine Manager. *Covid-19 Patient Transfer Procedures* by Summit Helicopters may be enacted by the KSM Mine Manager and SnipGold Occupational Health and Safety Officer if deemed necessary to transport personnel to a medical facility for testing (Appendix 2).

If a resident at the worksite develops flu, cold and Covid-19 symptoms, the **24/7 emergency number** will be called **1-866-343-4567**. If there are 2 or more cases of fever or respiratory symptoms on site the local health authority is to be contacted at: **Northern Health - Communicable Disease Hub** Phone (during business hours): **1-855-565-2990**; On-call medical health officer after hours phone: 1-250-565-2000, and press 7 and ask for the medical health officer on call.

The Covid-19 Safety Plan will be reviewed with all staff prior to their arrival at camp, including supervisors. This plan will be posted in the KSM camp kitchen area. Signage will be posted at KSM camp restricting visitors from entering camp. Proper handwashing techniques signage will also be posted at the KSM camp kitchen area and in accommodation buildings.

Training

Upon arrival to site an orientation will be conducted by the KSM OFA3. This will include training and education about the spread of COVID-19 and the mitigation steps that are undertaken at the KSM project. The steps for this are:

- Review of camp practices
- Review of personal hygiene expectations
- Training on cleaning shared surfaces such as tools
- Protocols around vehicles and helicopters
- Assignment of work pods
- Introduction to contact tracing reporting and check in procedures
- Documentation of staff undergoing the training

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4.5 Monitor the Workplace and Update Plans as Necessary

KSM camp will use an OFA3 in conjunction with the SnipGold Health and Safety Officer. Their primary roles will be to monitor and ensure KSM Mining policies and procedures are implemented. The SnipGold Health and Safety Officer will also monitor and update the COVID-19 plans as the field season progresses and as any potential new risks are identified, these updates will then be conveyed to the KSM OFA3. The SnipGold HSAO and KSM OFA3 will be responsible to staying up to date on any regulatory changes associated with COVID-19 restrictions.

The KSM OFA3 will be the main point of contact for any COVID-19 related questions in camp. The Mine Manager is responsible for the overall KSM health and safety. The Occupational Health and Safety Committee is available to the OFA3 if required.

4.6 Assess and Address Risks from Resuming Operations

Common to the exploration industry, the KSM Project is a seasonal operation, operating during the summer and fall months only. Training will occur at the beginning of the initial rotation for all crews and on an as needed basis if any new workers join mid-season or have a change in job responsibilities.

Equipment has been sourced to mitigate Covid-19 risks, including masks, gloves, and hand sanitizer. Adequate PPE supplies will be maintained on site for all employees during their rotation. Room sanitization and spraying systems as well as hand sanitization stations have been acquired and will be set up in common areas. All camp maintenance and equipment checks will be completed prior to camp opening.