

A stylized, light gray background illustration of a cityscape. It features various buildings, some with solar panels on their roofs, and a prominent Canadian flag flying on a tall pole in the center. The style is flat and modern.

APPENDIX N

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ENERGY FOR TODAY | L'ENERGIE POUR AUJOURD'HUI

EIA INDIGENOUS SUMMARY

Chaleur Ventus

#100-320 Queen Street, Fredericton, N.B. E3B 1B2 | 506-804-1080 | www.naveco.ca

CONFIDENTIAL

Document Version 3.0 created May 10, 2019



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Indigenous Peoples

The following section will highlight the efforts that have been made to date to engage and consult with First Nations communities and organizations whom may be impacted by the Project. As well, the section will discuss the steps anticipated to further engagement efforts with the Nations. The details of specific correspondence and discussions will be included in a First Nation Consultation Report that will be submitted to DELG. Please see Appendix 1 for Indigenous Engagement Tracker.

Concerns

Comments and concerns received from open house questionnaires, individual discussions, aboriginal consultation, local residents and other stakeholders relating to the Project and project activities will be collected.

These concerns will be addressed directly at the open house, through telephone conversations, emails, letters and one on one meetings. Following the open house, one-on-one discussions and other community engagement events, all concerns raised will be identified and presented in the First Nation Summary Report. The Proponent is committed to addressing, to the best of their abilities, all concerns pertaining to this proposed development and wind energy projects in general raised by Indigenous people.

Consultation will continue throughout the life of the Project. During the registration and public review period of the EIA document, the Proponent will be available within the community to answer questions and explain the content to community members. Please see Appendix 2 for Indigenous Engagement Plan and Appendix 3 for Indigenous Policy.

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APPENDIX 1


Proponent: First Nation Engagement Communication Log

FIRST NATION:

PROPONENT NAME:	Chaleur Ventus Limited Partnership	PROVINCIAL CONTACT/CONSULTATION LEAD:	
PROPONENT LEAD:	Naveco Power	LOCATION (REGION/RESOURCE DISTRICT):	Gloucester County
PROPOSED PROJECT/ACTIVITY(IES):	Wind Farm Construction	DATE SUBMITTED TO PROVINCE:	
APPLICATION TYPE(S) AND FILE #'S (where available):			

Date Year/Month/Day	Activity (e.g. Letter, E-mail, Phone Call, Meeting)	Proponent Contact	First Nation Contact	Purpose	Notes
2016-02-26	Meeting	Amit Virmani, Daniel Brassard	Chief David Peter-Paul, Terry Richardson	Discuss potential partnership on 20MW LORESS Project REOI for LORESS Part I	Meeting in Pabineau, also attended by Chief Everett as well as Councillor Gordon LaBillois. Draft MOU to Pabineau was submitted but did not move forward as they had already found a partner
2017-02-16	Email	Amit Virmani	Chief David Peter-Paul, Terry Richardson, Chief Everett, Gordon LaBillois	Discuss potential partnership on 20MW LORESS Project REOI for LORESS Part II	
2017-03-22	Meeting	Amit Virmani	Terry Richardson	Discuss potential partnership on 20MW LORESS Project REOI for LORESS Part II	Meeting in Pabineau
2018-06-02	Meeting	Amit Virmani	Gilbert Sewell	Introduction, potential IK study lead for our project	Informal meeting at a traditional medicinal plant workshop that he was hosting as part of Nature NB's planned activities.
2018-07-14	Meeting	Amit Virmani	Chief David Peter Paul, Terry Richardson, Gilbert Sewell	Informal hello	Informally met at Pabineau Pow Wow, individually, while attending the events. Discussed how to best approach Pabineau now that we knew we have won but are pre-PPA signing.
2018-07-30	Meeting	Amit Virmani	Terry Richardson	Avian Radar Study	Meeting with NB Power with all of the LORESS developers and representatives of Tobique and Pabineau as some of the local partners. Discussed our project a bit further, with Terry, back at our 320 Queen St, office. Informal discussion with Terry
2019-01-09	Email	Amit Virmani	Cecelia Brooks	Introduction, potential IK study lead for our project	Emailed MTI's Director of Indigenous Knowledge to have an informal meeting in order to understand how to best approach MTI. Did not hear back.
2019-01-16	Email	Tom Mann	Chief David Peter-Paul, Chief Alvery Paul, Stuart Gilby, Derek Simon, Jennifer Coleman	Introduction, potential IK study lead for our project	Tom introduced us in order to allow for the Chiefs to either meet together, or individually, to discuss the project
2019-01-23	Meeting	Amit Virmani	Jesse Simon	Learn about MTI	Recently departed MTI Executive Director. Met for lunch at Delta Fredericton in order to learn more about moving ahead with an IK study.
2019-01-28	Meeting	Amit Virmani, Tarek Abbasi, Sarah Arsenaault	Kopit Lodge	Introduction, potential IK study lead for our project	Met MJ, Charla, Bo, Keneth Francis, among others, to introduce our company and 3/4 of our team.

2019-02-20	Meeting	Amit Virmani, Tarek Abbasi	Kopit Lodge	Discussion of Indigenous involvement through all parts of the project	Kopit will provide a list of names of individuals they trust to conduct a thorough IK study as well as names of Environmental Monitors who can help with the process of conducting all necessary environmental studies. Naveco will provide them with a preliminary construction and milestone schedule as no other proponent has. This will give Kopit insight into a proponent's deadlines and ensure project information and responses are received in a timely manner.
2019-02-21	Email	Amit Virmani	Kopit Lodge	Invitation	Invitation to APC conference that Naveco is sponsoring
2019-02-21	Email	Amit Virmani	Kopit Lodge	Follow up	Naveco emails tracking number to Kopit to ensure they receive the cheque for the meeting on Feb. 20th, 2019.
2019-02-22	Email	Amit Virmani	Chief David Peter-Paul, Chief Alvery Paul, Stuart Gilby, Derek Simon, Jennifer Coleman, Tracy Anne Cloud, Kristie Halka-Glazier	Follow up	Follow up to Tom's email as no response was received and to determine Primary contact at MTI
2019-02-23	Email	Amit Virmani	Kristie Halka-Glazier	Follow up	Email from Kristie with a number of individuals CC'd. She will be our primary contact and will coordinate a meeting with Chief David Peter-Paul
2019-02-25	Event	Amit Virmani, Tarek Abbasi, Sarah Arseneault, Ori Cordido	N/A	Brand Awareness	Lead private sponsor for APC Energizing Atlantic Canada Clean Energy Conference. Met with folks and informally introduced them to our project in order to then do followup
2019-02-26	Event	Amit Virmani, Tarek Abbasi, Sarah Arseneault, Ori Cordido	Christianne Bernard	Brand Awareness	Held a mixer between events at the conference to better network with members of different First Nations. Reconnected with Christianne and mutually agreed to visit MMBC in order to give them a high level update for the Chaleur Ventus Project. Christianne felt we are on the right track with our outreach.
2019-02-27	Event	Amit Virmani, Tarek Abbasi, Sarah Arseneault, Ori Cordido	N/A	Brand Awareness	Trade show booth at conference in order to make people aware that we are interested in hiring Indigenous youth for positions in our office and expand our Development Team
2019-02-28	Email	Amit Virmani	Kristie Halka-Glazier	Follow up	Kristie is coordinating with Chief David Peter-Paul as well as Chief Alvery and is checking their availability for March 11-15, as well as April, so we may meet with them.
2019-03-04	Email	Amit Virmani	Kopit Lodge	Follow up	Delay in delivering them a project schedule from WSP. Email was acknowledged by Kopit Lodge.
2019-03-11	Email	Amit Virmani	Kopit Lodge	Follow up	Progress report of the delayed forwarding of the project schedule to Kopit Lodge.
2019-03-11	Email	Amit Virmani	Christianne Bernard	Follow up	Amit follows up to find out when would be the best time to meet in the Gaspé Bay with MMS in order to give them more insight into the Chaleur Ventus project.
2019-03-11	Email	Amit Virmani	Kristie Halka-Glazier	Follow up	Amit follows up with Kristie to find out when would be the best time to meet with Chief David and/or Chief Alvery for either March or April as he has not heard of a time that works for them.
2019-03-18	Email	Amit Virmani	Kristie Halka-Glazier	Follow up	Kristie responds that she is following up from her end and that March is a bad month for meetings due to vacation time. She is planning to hear back from the Chiefs in the next few weeks.

2019-03-20	Email	Amit Virmani	Kopit Lodge	Deliver project schedule to Kopit Lodge	Emailed Kopit Lodge the schedule and milestones for the project to ensure timely construction. Have asked them to share names of Environmental Monitors as well as individuals they feel would do well for the IK Study.
2019-03-27	Email	Amit Virmani	Kopit Lodge	Deliver project schedule to Kopit Lodge	Kopit Lodge emailed Naveco asking for a simplified version of the project schedule and Naveco delivered a simplified version later that day.
2019-04-16	Email	Amit Virmani	Kopit Lodge	Follow up	Naveco emails Kopit to ensure that the previously emailed, simplified project schedule, meets their needs and if they have any questions or comments about the schedule. Naveco also asked that if the schedule looked ok, for Kopit to please identify individuals it would accept to conduct the Indigneous Knowledge Study as well as any other individuals we should keep in mind for Environmental Monitoring and other tasks.
2019-04-18	Email	Amit Virmani	Kopit Lodge	Follow up	 They are looking for a new engagement coordinator, but will continue working closely with us till they find that person. Bo asked if we need names for the TK study, tree clearing and road construction.
2019-04-18	Email	Amit Virmani	Kopit Lodge	Follow up	Naveco responds yes, that they will need that help for the TK study, as well as anywhere else Kopit feels we can engage members of the community for work purposes. Naveco also asked when they would like us to hold a session in the community to help them learn more about wind.
2019-04-24	Email	Amit Virmani	Kopit Lodge	Meeting Scheduling	Naveco messages Bo Augustine, who is the interim engagement coordinator for Kopit, to setup a meeting in the Richibucto area, or Moncton, for 25th or 26th of April
2019-04-26	Meeting	Amit Virmani	Kopit Lodge	IK Study	Naveco meets with Bo at Delta Beausejour to discuss their ideal method of timeline for being consulted. He liked the construction schedule we sent. A little difficult to interpret at first glance, but easy to follow when read line by line. Will respond with next steps in relation to capacity funding and IK study by EOD Tuesday April 30th. Amit to provide Bo with job descriptions that can be posted online for Archeological Monitor as well as Environmental Monitor. Amit to email Bo a list of contractor services needed in 2020 so he can start reaching out to people that have responded to a recent NB Power project so we can contact people who are already interested in renewables. Thinks IK Study will take 4 months to complete. Will let us know if Kopit wants the community seminar educating people on wind to happen before, or after Bathurst announces, if it is important to hold that session in May or in June or if it can be done post EIA registration in June 2019.
2019-05-06	Email	Amit Virmani	Kopit Lodge	Job Descriptions	Amit sends job descriptions for Environmental Monitors as well as Archeological Monitors to recruit from within the community to be able to work on the wind project.
2019-05-15	Event	Amit Virmani	N/A	Brand Awareness	Informal meeting with Cecilia Brooks to discuss her potentially leading the IK Study and her possibly working closely with Kopit Lodge.

2019-05-16	Event	Amit Virmani	N/A	Brand Awareness	Informal meeting with Sascha LaBillois of Eel River Bar, to discuss potential economic opportunities for Indigenous businesses to participate in the wind project as well as to discuss if the community would like us to come there to inform them about the project. She says yes, they would be interested to know more over the coming weeks so be able to see where else there would be room for ERB to be able to participate economically.
2019-06-03	Email	Amit Virmani	Kopit Lodge	IK Study	Emailed Bo Augustine to follow up about IK Study Proposal
2019-06-04	Email	Amit Virmani	Kopit Lodge	IK Study	Bo emails back that Kopit would like to move forward with an Engagement Agreement. They want to move forward with Cecilia to do the IK Study as well as to help train an internal team so they may be able to conduct an EIA on their own and offer those services to proponents. Bo wrote: "We do want Cecilia to help us create our own EIS and how to review them, but we will need help to have her come here to train us and then we can use that experience and knowledge to do the work that is needed for your project. Moreover, we could use your project as the learning and starting point for our eventual EIA team."
2019-06-21	Event	Mariah Belyea, Sarah Arseneault, Oriana Cordido	N/A	Brand Awareness	Attended National Indigenous Peoples Day event held at the Beaverbrook Art Gallery.
2019-06-24	Email	Amit Virmani	Kopit Lodge	IK Study	Kopit sends over a draft Engagement Agreement to review.
2019-07-18	Meeting	Amit Virmani	Kopit Lodge	IK Study	Met with Kopit Lodge in Elsipogtog to review and then sign the Engagement Agreement. Agreement then given to Chief Sock to sign. Kopit Lodge (Bo Augustine), offers to help with introductions to Chief Albery and Esgenoopetitj Councillors as we've never met them, nor have a current personal connection with them, unlike Pabineau.
2019-07-24	Email	Amit Virmani	Kopit Lodge	IK Study	Email from Christian Augustine with the signed Engagement Agreement, counter signed by Kenneth Francis on behalf of Kopit Lodge and also by Chief Sock. Signed agreement includes [REDACTED] additional funds to help with training local talent for building institutional knowledge capacity within Kopit, in addition to the IK Study.
2019-07-27	Event	Amit Virmani	N/A	Invitation to attend Sun Dance Ceremony	Amit attends Sun Dance Ceremony in Elsipogtog, per invitation by Bo. Bo was a participant and Charla was in attendance.
2019-07-28	Event	Amit Virmani	N/A	Metapenagiag Pow Wow	Amit and Angel Ward attend Metapenagiag Intertribal Pow Wow.
2019-08-06	Email	Amit Virmani	Kopit Lodge	IK Study	Austin Simon, (Communications Engagement Coordinator for Kopit Lodge) sends an email to us with a draft workshop budget for hiring Cecilia Brooks to do a four day workshop to help build their EIA team
2019-08-06	Email	Amit Virmani	Kopit Lodge	Follow up	Bo emails us to follow up with an offer we made to help provide technology for their office, specifically about the delivery of three laptops, a filing cabinet and printer from us, to help grow Kopit's operations.
2019-08-14	Email	Amit Virmani	Kopit Lodge	Follow up	Amit emails Kopit Lodge to update them on the status of discussions with PETL to leverage the funds written in the Engagement Agreement for additional educational resources.

2019-08-14	Email	Amit Virmani	Pabineau	Follow up	Amit emails Chief David Peter-Paul, Terry and Chris, to setup a meeting in order to ask if they have any questions about our project and to find out if there is anything we can do to improve our outreach and project.
2019-08-14	Email	Amit Virmani	Kristie Halka-Glazier	Follow up	Amit emails Kristie about MTI's progress in setting up a meeting with Chief Alvery.
2019-08-15	Email	Amit Virmani	Terry Richardson	Follow up	Terry replies that Pabineau looks forward to meeting in September, once they have chosen a new Economic Development officer.
2019-08-23	Meeting	Amit Virmani	Kopit Lodge	Office Equipment Dropoff	Amit meets with members of Kopit Lodge while dropping off the office equipment specified in the 8/6/2019 correspondence. Spoke with Kenny about Kopit having an Environmental Technician ready to go to site to view what is happening as part of the EIA process.
2019-08-24	Event	Amit Virmani	N/A	Eel River Bar Pow Wow	Amit attends the Eel River Bar Pow Wow.
2019-08-31	Event	Amit Virmani	N/A	Elsipogtog Pow Wow	Amit, Ori, Sarah and Tarek attend the Elsipogtog Pow Wow. They bump into and briefly (informally) talk with Kenny.

A stylized, light gray background illustration of a cityscape. It features various buildings, some with solar panels on their roofs, and a prominent Canadian flag flying on a tall pole in the center. The overall style is clean and modern.

APPENDIX 2

Indigenous Engagement Plan for the Chaleur Ventus Project

by



April 8, 2017

(Updated by Naveco Power)

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About the primary author:

Troy Jerome, the President and CEO of SEN'TI Environmental and Indigenous Services, is a citizen of the Mi'gmaq Nation, residing at Listuguj, Quebec. Mr. Jerome began his career in 1989 serving the Mi'gmaq Nation in the Chiefs office with the Listuguj Mi'gmaq Government (LMG). He served as Director of Operations, LMG, from 1995 to 2004.

From 2004 onwards, Mr. Jerome began to monitor the development of the Wind Energy industry taking hold in Gespe'gewa'gi. Seeing a plan by the Quebec government to install over 40% of the 4,000 MW of wind energy (\$4.0 Billion in new investments) in the territory of his people, he sought to have Chiefs and Councils push to have the Quebec Assembly to deal with the Mi'gmaq on a Nation-to-Nation basis over this monumental development plan. After discussions with Chiefs regarding natural resources, Title rights and Nation Building strategies; including a plan to achieve a major wind energy project for the Mi'gmaq, Mr. Jerome was asked to serve as Executive Director and Nutewistoq (Speaker for the Gespe'gewa'gi Mi'gmaq) for the Mi'gmaq of Gespe'gewa'gi's political lobbying office, the Mi'gmawei Mawiomi Secrétariat (MMS). With the success of the strategy employed at the MMS, the Mi'gmaq achieved a twenty-year Power Purchase Agreement (PPA) for a 150 MW wind energy project. Having led the negotiations team and the development of the PPA, Troy was asked to serve as the Chairperson of the Mesgi'g Ugju's'n Wind Farm Corporation which oversaw the development and construction of the \$360 million project.

Troy also served his community of Listuguj as an elected member of Council. Elected to the Listuguj Mi'gmaq Council from 1999 to 2004, Mr. Jerome served to assist the Nation in its efforts to raise awareness of the Mi'gmaq rights to natural resources, the acknowledgement of Aboriginal and Treaty Rights and the Mi'gmaq right to self-determination. During his tenure on Council, Troy also served as a founding member of the Mi'gmawei Mawiomi from the inception in 2000 to June 2004.

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OVERVIEW

The Indigenous Engagement Plan consists of interacting with Indigenous leadership and organizations that could potentially be affected by the Project. The Indigenous Engagement Plan for the Project was developed to anticipate, avoid, mitigate and manage potential Project-related effects on the exercise of Indigenous or Treaty rights and interests.

The Indigenous Engagement Plan for the Project includes details regarding:

- guiding principles and goals of the program;
- design and scope of the program;
- implementation of the Engagement Plan, including:
 - engagement activities to date;
 - issues and concerns;
 - measures developed to address matters arising from the engagement process;
 - the potential for economic opportunities;
 - outcomes of engagement to date; and,
 - plans for ongoing engagement activities.

Naveco recognizes and respects the preference of individual communities and organizations to be addressed in a way that distinguishes their Indigenous identity. In this document, the term “Indigenous groups” is used when referring to more than one community and might encompass Indigenous communities or organizations that could be potentially affected by or interested in the Project. The organizations include tribal councils and provincial-territorial organizations.

Section 1. PRINCIPLES AND GOALS

Section 1.01 Principles

The Indigenous Engagement Plan is built upon and guided by Naveco's corporate values of trust, integrity, performance and sustainability.

The following principles guide Naveco's approach to Indigenous engagement:

- Building respectful relationships, promoting open communication and cultural awareness is fundamental to Naveco's business success. Naveco applies these same tenants in its work that interfaces with Indigenous communities.
- Employing a workforce that is diverse, inclusive and one that strives to be representative of the communities in which we work by seeking to recruit Indigenous employees proactively.
- Seeking to increase business opportunities for its Indigenous partners and to build capacity in the Indigenous business community.
- Investing in community programs that support cultural awareness, skill development to increase workforce participation and overall business acumen. Naveco's investment may be through in-kind contributions.
- Developing and implementing an Indigenous Engagement Plan for each Naveco project that interfaces with an Indigenous Community/Leadership.

Section 1.02 Goals

The goals of Naveco's Indigenous Engagement Plan are to:

- build and maintain positive long-term relationships with Indigenous communities and organizations potentially affected by the Project;
- develop timely and accurate information to allow for informed, effective and meaningful engagement with communities;
- identify acceptable community engagement protocols and practices;
- ensure that Indigenous groups' input and concerns are gathered, understood and integrated into Project design and execution, including the environmental and socio-economic assessment (ESA), as appropriate;
- support the participation (e.g., capacity funding and information sharing) of Indigenous communities and organizations in regulatory processes;
- integrate traditional knowledge in Project design and mitigation measures, where feasible;
- ensure that Indigenous groups are aware of how their participation has influenced Project planning, including the ESA;
- ensure that concerns and issues regarding potential effects related to Indigenous groups are documented and addressed;
- identify the potential for education, training, employment and contracting opportunities; and,
- facilitate ongoing communication that continues through Project construction and operations.

Knowledge obtained through the Indigenous engagement process is communicated to the appropriate disciplines throughout the Project.

Section 2. DESIGN AND SCOPE

Naveco's Indigenous Engagement Plan is continuously adapting according to the nature, location, potential effects of the Project, and the interests and concerns of Indigenous groups. While the underlying principles remain the same, the purpose, scope and degree of engagement vary according to the potential for effects and interests of each Indigenous group. Factors that influenced the Indigenous Engagement Plan design include the:

- Project components;
- geographic location of the Project; and,
- Indigenous groups that could potentially be affected by or interested in the Project.

The Indigenous Engagement Plan respects as well as, to the extent practicable, follow the traditions and protocols specific to each Indigenous group. Although Naveco typically engages with Indigenous communities individually, some Indigenous groups prefer to be represented by a tribal council or a provincial-territorial organization. When directed to do so, Naveco communicates directly with the identified organization.

The Indigenous Engagement Plan provides Indigenous groups with opportunities to:

- provide information relevant to the Project;
- receive and discuss Project information;
- ask questions and request more detailed information in areas of interest; and,
- identify and communicate interests and concerns.

Naveco will work collaboratively with Indigenous communities and organizations to address Project-related concerns through Project design or operational changes where practicable and will provide information on how their input influenced Project design changes. Naveco will discuss with Indigenous groups the proposed measures to avoid, mitigate, or otherwise manage potential effects of the Project.

Section 2.01 Scope

The Project is located in Gloucester County (spans Pokeshaw, Grand Anse, Anse Bleue, to Bertrand) on a 1,400+ acre site. Several Indigenous groups will express a desire to learn more about the Project's scope, facilities, potential environmental and socio-economic effects. The Indigenous Engagement Plan is designed to foster productive dialogue and exchange of information with the communities and organizations with an interest in the Project.

While many of the engagement activities are similar in the different provinces and overall Project information is consistent, specific regional information is provided to each Indigenous group describing the relevant Project components – either turbines or transmission lines with its associated facilities. Newsletters, email messages, materials, displays and open house materials are provided in English or French, depending on preferences.

Section 2.02 Initial Determination of Potentially Interested Indigenous Groups

To identify an initial list of Indigenous communities, Naveco conducted desktop research to assess the proximity of the Project area to:

- Indian reserves as they appear in the Indian Lands Registry;
- lands publicly identified as or associated with treaties, treaty land entitlement (TLE), comprehensive or specific claims, or other lands to which an Indigenous group seeks reserve designation under the Policy on Additions to Reserve and Reserve Creation;
- areas previously identified by Indigenous communities or organizations as lands used by their members for traditional activities such as hunting, fishing or harvesting activities, or potential areas of sacred and spiritual importance.

Naveco also identified the regional boundaries of the areas crossed by the Project components.

Naveco identified Indigenous communities located within an approximately 200 km zone and organizations that may have an interest in the Project. Indigenous communities within approximately 50 km from the center of the Project (or 100 km zone) were identified as potentially affected communities. The following sections outline the rationale and criteria for initial identification of Indigenous communities and organizations.

(a) Local Indigenous Communities – Tier 1

Local Indigenous communities are defined as communities located within 25 km of either side of the Project (or 50 km zone). The 50 km zone includes Indian reserves, TLE lands, and where known, asserted traditional territories, geographically located in the 50 km zone.

Some Indigenous communities and organizations geographically outside the 50 km zone were classified as Local Indigenous groups because they have asserted traditional territories or established interests in the 50 km zone. Some Local Indigenous groups on the outer limits of the 50 km zone could be reclassified as Bordering Indigenous groups, depending on the anticipated extent of Project-related effects and known areas of the exercise of rights and interests.

Naveco actively engages local Indigenous groups regarding the Project. Project representatives strive to meet face-to-face with these Indigenous groups frequently (and on request) to closely monitor, track and respond to their requests, questions, comments, interests and concerns.

Regular Project update presentations to Indigenous governments or the relevant governing body of the Indigenous group include one-on-one, face-to-face meetings with designated representatives as well as community meetings. Local Indigenous groups will receive Project information packages with materials and will be offered resources to support their participation in the engagement process, including the opportunity to gather traditional knowledge.

(b) Bordering Indigenous Groups – Tier 2

Bordering Indigenous communities are defined as communities or organizations located beyond the 25 km distance from the Project to an approximate distance of 50 km the edge of the Project's site (or 100 km zone). Although these Indigenous communities are not in the Local zone, they may be reclassified as a Local Indigenous group.

This Indigenous engagement zone includes:

- Indigenous groups with Indian reserves, TLE land, asserted traditional territories and treaty lands in the 100 km zone; and
- organizations, agencies and delegated engagement authorities with established Indigenous interests in the 100 km zone.

The engagement approach with Bordering Indigenous groups is generally consistent with Local Indigenous groups during the early stages. Bordering Indigenous groups

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are actively engaged, and Project representatives strive to meet face-to-face with these groups frequently (and on request) to closely monitor, track and respond to their requests, questions, comments, interests and concerns. Regular Project update presentations to Indigenous governments or the relevant governing body of the Indigenous group include one-on-one, face-to-face meetings with designated representatives, and community meetings. These Indigenous groups will receive Project information packages and materials, and will be offered resources to support their participation in the engagement process.

(c) Regional Indigenous Groups – Tier 3

Regional Indigenous groups are defined as communities or organizations not likely to be affected by the Project by virtue of their distance from the Project's borders or the absence of known interest in the Project area. Geographically, these Indigenous groups are located beyond 50 km from the Project to an approximate distance of 100 km from the border of the Project (or 200 km zone). These Indigenous groups are not in the Local or Bordering zones.

This Indigenous engagement zone includes:

- Indigenous groups with Indigenous reserves, TLE lands, asserted traditional territories, in the 200 km zone;
- organizations, agencies and delegated engagement authorities with established Indigenous interests in the 200 km zone;
- provincial, political or treaty organizations that might be affected by or have an interest in other Naveco assets, projects or operations.

Regional Indigenous groups will receive Project information, as requested. At the outset and on occasion, as determined appropriate, these Indigenous groups are contacted by telephone or email to confirm that they are aware of the Project or Project developments and milestones, as well as to determine if they have questions or concerns. Contact with these Indigenous groups is tracked, although these Indigenous groups are not monitored as intensively as Local or Bordering Indigenous groups.

After the initial identification phase, some Indigenous groups could subsequently be added as Regional Indigenous groups as they self-identified, or in response to changes to the scope of the Project. The process of identification and classification of Local, Bordering and Regional Indigenous groups will occur throughout the Project.

Section 2.03 Confirmation of Indigenous Groups for Engagement

The initial determination of potentially affected Indigenous groups resulted in the identification of 11 Local, Bordering and Regional Indigenous communities and organizations. That initial list will be used to confirm potential interest in the Project.

	Indigenous Communities or Organizations	Tier 1	Tier 2	Tier 3
1	Eel Ground First Nation (Natoaganeg)			<input checked="" type="checkbox"/>
2	Eel River Bar First Nation (Ugpi'ganjig)			<input checked="" type="checkbox"/>
3	Elsipogtog First Nation (Big Cove)			<input checked="" type="checkbox"/>
4	Esgenoôpetitj Indigenous (Burnt Church)		<input checked="" type="checkbox"/>	
5	Listuguj Mi'gmaq Government (Listuguj)			<input checked="" type="checkbox"/>
6	Metepenagiag Mi'kmaq Nation (Red Bank)			<input checked="" type="checkbox"/>
7	Micmacs of Gesgapegiag (Maria)			<input checked="" type="checkbox"/>
8	Pabineau Indigenous (Oinpegitjoig)		<input checked="" type="checkbox"/>	
9	North Shore Micmac District Council			<input checked="" type="checkbox"/>
10	Mi'gmawe'l T'plutaqqn Inc.			<input checked="" type="checkbox"/>
11	Mi'gmawei Mawiomi Secretariat			<input checked="" type="checkbox"/>

Once the PPA is signed with the utility, Naveco will contact Indigenous leaders and representative organizations in person, by telephone and by email to respectfully inform them of the upcoming announcement of the Project, to introduce the Project team, exchange contact information and confirm their interest in the Project. This process will help validate and update the initial list of contacts and Indigenous groups.

Subsequent to the initial contact, Naveco will send a letter and a map, to key organizations, (including the initial list of Indigenous communities and organizations,) and government departments. For this Project, these departments will include:

- Crown and Indigenous Relations and Northern Affairs Canada;
- Indigenous Services Canada; and,
- the New Brunswick Minister responsible for Indigenous Affairs.

Contact will also be made with departments and agencies responsible for matters relating to Crown consultation, environment, land and economic development. Some federal and provincial agencies may provide general resources to assist in the research and determination process. This further identification process was intended to:

- Provide the Project team with updated information about Indigenous groups that might be affected by, or have an interest in, the Project;
- Seek guidance on the accuracy of the initial list of Indigenous groups identified as potentially affected by or interested in the Project; and,
- Help identify other Indigenous groups potentially affected by or interested in the Project.

Throughout the development phase, Naveco will make changes to the initial engagement list and refine the Project.

Section 3. ENGAGEMENT PROCESS

The Indigenous Engagement Plan is iterative and is employed throughout the duration of the Project. The iterative process consists of these elements:

- sharing Project information;
- gathering input, offering resources and establishing agreements to support the engagement process;
- identifying opportunities and developing programs to support project-related benefits or community-based initiatives;
- responding to comments and questions; and,
- identifying concerns and developing measures to avoid, mitigate or otherwise manage potential effects.

The iterative engagement process intends to:

- determine as well as refine the scope of the engagement process and provide opportunities for information exchange;
- support engagement with identified communities and organizations by offering capacity funding for engagement activities so that their leadership as well as constituency understand the nature along with the scope of the Project, and share information about their concerns with the Project including how it might affect them;
- develop communication methods to seek as well as consider comments about the proposed Project and associated facility sites, potential environmental and socio-economic effects, and other areas of potential concern;
- support efforts to gather and document traditional knowledge (TK) information on the current use of land, water and resources by Indigenous groups;
- review and discuss the results of the TK or other community-based studies;
- gather information on community interests to identify capacity development or community investment opportunities;
- develop strategies for contracting, employment and other economic opportunities;
- document and record Project-related issues according to potential effects;
- report back to Indigenous groups with updated Project information as it becomes available so questions and concerns can be answered or addressed;
- provide information and updates to Indigenous groups to ensure understanding and support for proposed mitigation;
- where possible, seek to resolve Project-related issues through Project design or operational changes; and,
- address outstanding interests, issues or concerns through regulatory hearing proceedings or other means.

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Section 3.01 Indigenous Engagement Team

The Naveco Indigenous engagement team facilitates consultation with Indigenous groups from initial engagement and logistics, to assisting with fieldwork activities, reviewing and summarizing collected data, consultation on compiled data, completion of summary reports, reviewing reports for inclusion in the environmental assessment and review, finalization and submission of the environmental assessment.

While in the field the Indigenous engagement team will engage Indigenous peoples to build and enhance relationships, to provide information, to agree on a number of engagement activities, including project-related TK activities and capacity funding to conduct them, and generally to receive as well as address comments and concerns expressed by Indigenous groups in the respective regions.

The team is also responsible for information gathering, coordinating community TK studies and facilitating discussions related to Project information, potential economic opportunities and measures to avoid, mitigate or otherwise manage possible effects.

Section 3.02 Engagement Tools

To implement the Engagement Plan, Naveco uses a wide range of activities and communication tools to engage Indigenous groups. Engagement activities are conducted, and materials are provided in English and/or French. These activities and materials include:

- Project-specific letters and email messages;
- News releases;
- Project-specific brochures and maps;
- Project-specific fact sheets;
- Industry association brochures;
- Presentations;
- Face-to-face meetings;
- Telephone calls;
- Public open houses;
- Open house notifications;
- Newspaper, television, and radio advertisements;
- Project website;
- Project email address;
- Project toll-free phone number;
- Naveco social media forums (Facebook, LinkedIn, Blog, Twitter, YouTube)
- Information request card
- Project newsletters

In addition to Project-wide communication tools consistently used to share information about the Project, the following communication tools and activities are explicitly used to engage Indigenous groups:

- GIS data and shapefiles, on request;
- Oversize maps; and,
- Community information sessions and technical working groups.

These activities plus the associated communication tools are used throughout the Engagement Plan implementation phase and are updated as required.

Section 4. PROGRAM IMPLEMENTATION

Naveco will engage Indigenous groups potentially affected by or interested in the Project once the Project receive the go-ahead from its agent. As discussed in Section 2.2, Initial Determination of Potentially Interested Indigenous Groups, early on Naveco began contacting Indigenous leaders and representative organizations to introduce as well as confirm potential interest in the Project.

Section 4.01 Sharing Project Information

The day the Project is announced Naveco will issue a news release about the launch of the Project, which initiates engagement activities. On the same day, a Project website as well as a Project toll-free telephone and a Project email address will be launched.

The Indigenous engagement team will follow up with email and telephone calls to confirm receipt of the information, answer initial questions, note any concerns or interests shared regarding the Project or ongoing engagement. If Indigenous communities or organizations are interested in meeting to learn more about the Project, a meeting will be scheduled to present the following information:

- preliminary maps showing the site and proposed transmission interconnection corridor segments in proximity to reserve lands, major centers, towns, roads, water bodies or other landmarks in the area relevant to the specific Indigenous group; and,
- PowerPoint presentation to provide a high-level overview of the Project.

Throughout the duration of the Project Naveco will continue to provide updated information, answer questions and gather input.

A Project information package will be assembled, the intent of which is to help answer some of the following questions. The information packages will include the following materials:

- Naveco Corporate Profile;
- Project brochure: Chaleur Ventus Project: An Introduction;
- Naveco brochure: Your Safety, Our Integrity;
- Naveco brochure: Indigenous Engagement Policy; and
- Information request card.

This information will be provided in English and/or French, based on regional preferences basis.

Section 4.02 Gathering Input

Naveco will work with Indigenous groups to gather input, identify interests plus specific concerns. Each community or organization may have different processes or means of collecting and sharing information. Naveco works to understand how it can tailor its methods to gather information from communities and organizations, to understand the specific needs or process of each community or organization and to provide resources to support engagement activities.

(a) Funding Agreements

To support the engagement process, Naveco will make available to Indigenous communities and organizations several forms of agreement, which are discussed in the following sections.

(i) Letter of Agreement

Naveco offers initial resources to Indigenous communities and organizations to support the communication of initial Project information in order to develop a respectful and effective engagement process. The intent of the Letter of Agreement (LOA) was to provide funding to:

- enable representatives to attend meetings with Naveco's representatives and provide feedback regarding the Project;
- make arrangements for Project presentations;
- coordinate information meetings, community meetings and other events directly related to the Project to provide information and feedback;
- undertake other activities as appropriate to exchange information, provide feedback, ensure Naveco is informed about the Indigenous community and organization's circumstances, needs and interests in relation to the Project.

(ii) Communications and Engagement Funding Agreement

Naveco will convey to Indigenous groups that the LOA is an initial offer of resources, and that additional funding could be made available to support the development and implementation of a comprehensive Engagement Plan. The Communications and Engagement Funding Agreement (CEFA) was developed to:

- provide a framework for Naveco and the Indigenous communities or organizations to share information and have discussions about:
 - a. the Project;
 - b. potential effects of the Project,
 - c. their use of the land, resources and effects, if any, of the Project on their use, and
 - d. steps that can be taken to avoid, minimize or otherwise manage potential Project effects
- gather information directly from the Indigenous communities or organizations, where possible, to provide information on the potential impacts of the Project on Indigenous groups and how they were addressed;
- comply with regulatory requirements for the Project respecting consultation with Indigenous groups; and,
- provide reasonable funding to assist Indigenous communities' and organizations' participation in the above activities.

Engagement activities proposed under the CEFA include the following:

- engagement meetings at all levels including at community level;
- community leadership meetings;
- regional technical working groups dedicated to specific topics of interest;
- TK information gathering;
- community impact assessment;
- summary of issues report detailing particular issues or concerns and proposing measures to address them; and,
- economic development activities to explore opportunities related to economic development, education and training, employment, resource needs and community investment in connection with the Project.

Section 4.03 Traditional Ecological Knowledge and Land Use

As part of the engagement process for the Project, Naveco designed a TK information-gathering program.

The primary objective of the Project's TK program is to gather TK information to assist in identifying potential effects of the Project on environmental and socio-economic elements of identified interest to Indigenous communities or organizations. The TK program for the Project seeks to:

- involve Indigenous communities or organizations as early as possible in Project planning;
- formally introduce the Project to Indigenous communities or organizations and provide initial information;
- communicate relevant material changes to the Project;
- provide ongoing Project updates, including communication about the Project and the anticipated regulatory schedule;
- identify and discuss concerns regarding the Project as early as possible;
- actively seek and consider Project-related comments, including:
- project siting and facility site selection;
- potential adverse environmental effects and socio-economic effects as well as proposing measures to avoid, mitigate or otherwise manage possible adverse Project effects;
- identify sites of cultural and historical importance;
- identify and consider potential adverse effects on the current use of lands and resources for traditional purposes (traditional land use [TLU]);
- obtain local and traditional ecological knowledge (TEK)

Naveco understands that TLU is the identified use of lands for traditional purposes by an Indigenous community or organization. TEK is the body of knowledge held by a community or organization on behalf of its members about its traditional territory, or the lands members of the community or organization have used over time (e.g., wildlife migration patterns, vegetation growth).

The Canadian Environmental Assessment Act (CEAA) guidance documents (2013) refer to Aboriginal Traditional Knowledge (ATK). For this Project, Naveco has adopted a broad and inclusive definition that addresses the key information input sought by relevant regulatory authorities and Indigenous groups.

Implementation of the TK program is also guided by the goals of the Indigenous Engagement Plan for the Project, such that Naveco will integrate feedback and information on concerns, including local TK information into the planning process to

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develop appropriate measures to avoid, mitigate or otherwise manage potential adverse effects of the Project.

(a) Integration of Traditional Knowledge

TK information has been and will continue to be gathered through a variety of means and methods, including:

- review and synthesis of existing community or organization TK information;
- workshops, map workshops, technical workshops;
- one-on-one interviews;
- aerial reconnaissance;
- ground-based fieldwork;
- biophysical field research; and,
- ongoing participation in monitoring and follow-up programs.

Information incorporated in the Project application as well as ESA reflects the preliminary stage of most discussions and negotiations with Indigenous groups. The Project ESA also considers and indicates publicly available TK information deemed relevant to the assessment of potential Project-related effects.

Naveco will implement its TK information-gathering program with the goal of gathering and assessing TLU and TEK information that will inform the ESA. Methods for integration and application of available TK information are described in the ESA.

Protocols and processes are developed between Naveco, its environmental consultants and each Indigenous group participating in the TK program for the Project.

Information considered confidential submitted by Indigenous communities and organizations will not appear on the public record however but will be used to inform the development of mitigation strategies.

Section 5. INDIGENOUS ECONOMIC OPPORTUNITIES

The Project has the potential to provide economic opportunities for Indigenous communities or organizations, including initiatives to support employment, training, contracting, business development, and community investment under its Indigenous Contracting and Employment Policy. Naveco will engage Indigenous communities and organizations to identify economic opportunities relevant to each community or organization. The following sections describe economic opportunities being developed and implemented.

Section 5.01 Indigenous Contracting and Employment Program

Naveco supports local communities by providing contracting and employment opportunities to qualified Indigenous and local businesses. Naveco is guided by Naveco's Indigenous Contracting and Employment (ICE) Program, which is designed to fulfill commitments under the company's Indigenous Engagement Policy and is applied in all Naveco projects.

Naveco will implement an Indigenous contracting plan that aligns with both policies referred to above. The Indigenous contracting team meets with Indigenous communities and seeks to identify specific economic opportunities that are within their capacity. Generally, hiring takes place through a lead contractor. Naveco will attempt to match the Indigenous businesses with subcontracting opportunities by undertaking discussions with each community and organization.

An overview of Naveco's approach and the types of contracting opportunities that might be available are outlined in Naveco's Indigenous Engagement Policy. The following section describes the key steps and objectives of the Indigenous Contracting and Employment Program.

(a) Program Overview

Initial steps in the Indigenous Contracting and Employment Program are as follows:

- meet with Indigenous communities and organizations to share Naveco's Indigenous contracting and employment program practices; and,
- provide a detailed overview of the Project, which will include an accurate scope of work that can be used to determine areas for economic opportunities to support the construction and in-service milestones of the Project.

Development – The Development phase requires specialized services such as renewable energy infrastructure engineering, geotechnical, environmental and land services. Most of the preparatory work is completed through specialized lead contractors. There are some contracting opportunities available to Indigenous and local contractors during this phase that are typically sub-contracted by the lead contractor. The contracting opportunities include:

- Surveying and Geotechnical
- TLU and TEK studies
- Wildlife monitoring
- Marine Mammal monitoring
- Snow clearing
- Transportation
- Equipment rentals
- Building access roads
- Brushing and clearing

Pre-Construction – The pre-construction phase involves preparation of the site, access road construction, and infrastructure. During this phase, Indigenous and local contractors often provide the following services.

- ROW clearing
- Support services
- Site preparation
- Temporary infrastructure
- Access road building
- Heavy equipment
- Equipment rental
- Janitorial services
- Fuel supply
- Traffic control
- Geotechnical Services
- Environmental Services

Construction – The Construction phase is the period when most of the project work occurs, as such, more contracting opportunities are available to Indigenous and local contractors during this phase. The possibilities include:

- Security services
- Medical services
- Material hauling
- Charter transportation
- Skilled trades
- Tower installation

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- Electrical and mechanical work
- Environmental services
- Equipment rentals and leasing
- Traffic control
- Security services
- Waste and sewage services
- Consumables supplies
- Construction monitoring
- Shipping services
- Fuel supply
- Site cleanup
- Reclamation

Operations - During the operations phase, fewer contracting opportunities are available for local and Indigenous contractors.

- Site cleanup
- Water hauling
- Site maintenance
- Consumables supplies
- Turbine maintenance and repair
- Weed, rodent and pest control
- Reclamation
- Catering

(b) Contractor Qualifications Assessment

Assessment and interest determination of contractor qualifications, capability, and readiness involves the following steps:

- gather information about Indigenous contractors or their joint venture partners that might align with goods or services required for the Project;
- offer a business readiness assessment before construction;
- in collaboration with Indigenous groups, develop an Indigenous contractors' database that can be used by the Project's lead contractors and other industry partners; and,
- engage industry associations, training and employment and human resources offices to assess available workforce qualifications and availability.

(c) Partnership Support and Indigenous Evaluation Criteria

Steps at the partnership support and Indigenous contractor evaluation stage include:

- provide potential lead contractors with a list of contractors affiliated with local Indigenous groups to be considered for work on the Project;
- arrange as well as participate in meetings with Indigenous groups and potential lead contractors in order to identify the contacts in Indigenous communities and organizations for employment and contracting;
- insert Indigenous economic participation clauses in Naveco's contracts;
- encourage and assist all lead contractors to maximize local Indigenous participation through direct employment plus subcontracting

opportunities during pre-construction and construction phases of the Project;

- require each lead construction contractor to submit an Indigenous Inclusion plan; and,
- include Indigenous participation as an evaluation criterion when evaluating and awarding lead contracts.

(d) Contract Award

The contract award process involves the following steps:

- inform Indigenous groups of the successful lead contractors; and,
- offer debrief meetings with unsuccessful Indigenous contractors to help them understand why they were not selected and provide feedback.

(e) Construction and Contract Monitoring

The construction and contract monitoring process involves the following steps:

- provide a dedicated resource person to act as a construction liaison between Indigenous groups and the lead contractors to facilitate effective communication;
- provide guidance and support to the lead contractors, Indigenous communities and organizations throughout the Project construction phase;
- implement the terms of any participation agreement signed with Indigenous communities and organizations;
- track and monitor Project investment in Indigenous contracting and employment;
- meet with Indigenous communities and organizations (when requested or contractually required) to review their participation; and,
- provide a post-construction debrief meeting to Indigenous communities and organizations on Project successes and challenges.

To support this program, Naveco has instructed its supply chain team to meet with interested groups and businesses to discuss the Indigenous Contracting and Employment Program. Once team members from the Indigenous engagement team have established a relationship with an Indigenous community or organization, the supply chain representatives will reach out to introduce themselves, offering an opportunity to meet with the community or organization to outline and present the objectives of the Indigenous contracting program.

Section 5.02 Capacity Development and Training

Naveco recognizes the importance of encouraging and enabling community participation in the Project. Naveco will work with local Indigenous groups in order to develop their capacity for providing support and resources to communities. This supports the community's long-term goals for skills development and training enabling them to participate in Project activities. In collaboration with local Indigenous groups, Naveco will continue to work with communities to identify opportunities for capacity development.

To encourage and enable community participation in the Project, Naveco has and will continue to collaborate with local Indigenous groups to identify training needs related to employment opportunities during the pre-construction, construction and post-construction phases of the Project. Naveco and its lead contractors will then work with the community or organization (through their human resource coordinators, local economic development and education officers, or other designated responsible representative) to support completion of training requirements identified through this collaborative effort.

Examples of training offered in the past include support and sponsorship vehicle safety training, First Responder, Workplace Hazardous Materials Information System training.

Section 5.03 Community Investment

Through community engagement, Naveco has developed an Indigenous community investment strategy for communities near its planned operations. As a result, Naveco has clearly defined three focus areas for community investment:

- community – supporting initiatives that bring communities together, develop leadership and engage members;
- safety – funding initiatives that enable communities to respond effectively to local needs, focusing on emergency preparedness, accident prevention, and education and training;
- environment – working with organizations to conserve critical habitat, protect species at risk and educating individuals about the importance of the environment.

Naveco has allocated internal resources dedicated to supporting the community investment strategy. Naveco works to communicate and allocate funding to various initiatives, programs, community events and cultural gatherings.

Section 6. ENGAGEMENT PROGRAM OUTCOMES

Indigenous engagement information is collected and managed in a database designed to capture the engagement efforts with each Indigenous group. Information collected includes the following:

- list of Indigenous groups provided with Project-specific information;
- description of how and when information was provided;
- dates and locations of activities and meetings throughout the engagement process
- summary of consultation efforts and outcomes, recording concerns expressed, including general and specific Project-related concerns about potential adverse Project effects on the exercise of treaty or Indigenous rights or other interests; and,
- description of the proposed follow-up with Indigenous groups, if required.

Section 6.01 Issues, Concerns, and Responses

Issues defined by the Project team as Project-specific requests related to various topics of interest and might be task oriented. These would include, for example, interest in the environment, safety, and economic opportunities, which might be addressed by providing more information or holding follow-up meetings with technical personnel for further discussion.

Concerns will be identified based on the potential adverse effects of the Project and those concerns are managed with appropriate diligence. Processes will in place to identify concerns and mitigate them accordingly, where possible. Mitigation measures are generally discussed with Indigenous groups, and they are notified of actions taken to mitigate their concerns.

Naveco will engage the Mi'gmawe'l T'plutaqqn and local Indigenous communities in New Brunswick. It is anticipated that their concerns will include:

- turbine safety – for such things as the potential effects of an oil spill;
- loss of birds and bats;
- traditional sites and harvesting areas;
- economic development; and,
- employment plus contracting opportunities.

Section 6.02 Mitigation and Issue Resolution

Project-specific input received from Indigenous groups is incorporated in Project design, planning, and the ESA, where practicable. The information collected is reviewed by discipline experts for consideration of modifications to the Project along with other balancing factors unrelated to Indigenous groups' interests. Naveco then develops mitigation measures identified for the Project in collaboration with Indigenous groups during the engagement process. Naveco is addressing the issues and concerns raised through the following mechanisms:

- supporting TK information gathering;
- reviewing TK information to understand the scope and depth of potential Project-related effects identified by Indigenous groups;
- making Project design or operational changes where feasible;
- meeting with Indigenous groups to review TK information and discuss proposed mitigation options, including standard, proven mitigation measures developed by Naveco;
- developing the response or mitigation plan to address issues and concerns identified by Indigenous groups, including an Environmental Protection Plan, which is applied during the construction phase of the Project;
- providing information and updates to Indigenous communities and organizations to facilitate a broad-based understanding of proposed mitigation measures; and,
- pursuing the dialogue on issues, concerns and potential mitigation measures, as information continues to be exchanged and issue summary reports are received from Indigenous groups.

Section 6.03 Notification of Activities

Indigenous groups will be notified on the decision to construct the Project. Following notification identified Indigenous communities and organizations would be contacted to determine if meetings or briefings before the start of construction would be of value. Open lines of communication with Indigenous groups will be maintained throughout the pre-construction and construction phases of the Project.

Mitigation measures based on findings of the TLU studies and documented in the final Environmental Protection Plans will be implemented during the construction phase of the Project. Site-specific mitigation measures will be applied as required and could include opportunities for monitoring pre-identified areas of interest during construction.

During construction, ongoing engagement activities will continue using various approaches that are responsive to the Indigenous communities and organizations involved in the Engagement Plan. Naveco will also continue to implement and track commitments to confirm these activities have been completed.

Section 7. OPERATIONS

Following construction, engagement activities will be transitioned from construction to operations. The operations team will continue to build and maintain relationships with Indigenous groups in the Project area.

Naveco will develop a Public Awareness Program that will be implemented for the Project once the Project is in service. This program facilitates consistent, ongoing communication about safety, integrity and emergency response with Indigenous groups, key community stakeholders and interested parties, such as landowners, government representatives, excavators/contractors, emergency response agencies and the public at large.

A stylized, light gray background illustration of a cityscape. It features various buildings, some with solar panels on their roofs, and a prominent Canadian flag flying on a tall pole in the center. The style is flat and modern.

APPENDIX 3

Naveco Power Inc.

Indigenous Engagement Policy

2018

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Section 1. POLICY FRAMEWORK

Section 1.01 Background

Indigenous peoples in Canada are demanding a greater voice and participation in economic activities occurring on their lands. Indigenous Governments have demonstrated on many occasions they have the resources and capacity to affect the execution of projects. It is therefore prudent to engage Indigenous peoples in a positive and proactive process to ensure the effective execution of a project.

The Naveco Indigenous Engagement Policy is framed on existing domestic and international laws concerning the rights of Indigenous peoples as set out in this policy statement.

“At Naveco we acknowledge and appreciate the Indigenous rights to land and resources, their values, and the contributions of Indigenous peoples to building a strong and resilient economy. We will engage Indigenous peoples and their governments to support and contribute to the reconciliation process by respecting the Indigenous worldview and offering economic opportunities where and when appropriate.”

Amit Virmani, Naveco Power CEO

Section 1.02 United Nations Declaration on the Rights of Indigenous Peoples

Canada has affirmed its support of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). The declaration recognizes Indigenous peoples as having certain rights that Nation states must respect and honour.

The Preamble of the Declaration includes the following clauses:

Concerned that Indigenous peoples have suffered from historic injustices as a result of, inter alia, their colonization and dispossession of their lands, territories and resources, thus preventing them from exercising, in particular, their right to development in accordance with their own needs and interests,

Recognizing the urgent need to respect and promote the inherent rights of Indigenous peoples which derive from their political, economic and social structures and from their cultures, spiritual traditions, histories and philosophies, especially their rights to their lands, territories and resources,

Recognizing also the urgent need to respect and promote the rights of Indigenous peoples affirmed in treaties, agreements and other constructive arrangements with States,

Welcoming the fact that Indigenous peoples are organizing themselves for political, economic, social and cultural enhancement and in order to bring to an end all forms of discrimination and oppression wherever they occur,

Convinced that control by Indigenous peoples over developments affecting them and their lands, territories and resources will enable them to maintain and strengthen their institutions, cultures and traditions, and to promote their development in accordance with their aspirations and needs,

Recognizing that respect for Indigenous knowledge, cultures and traditional practices contributes to sustainable and equitable development and proper management of the environment,

Then the United Nations:

Solemnly proclaims the following (excerpts from a longer list) United Nations Declaration on the Rights of Indigenous Peoples as a standard of achievement to be pursued in a spirit of partnership and mutual respect.

Article 15

- 1. Indigenous peoples have the right to the dignity and diversity of their cultures, traditions, histories and aspirations which shall be appropriately reflected in education and public information.*
- 2. States shall take effective measures, in consultation and cooperation with the Indigenous peoples concerned, to combat prejudice and eliminate discrimination and to promote tolerance, understanding and good relations among Indigenous peoples and all other segments of society.*

Article 17

- 1. Indigenous individuals and peoples have the right to enjoy fully all rights established under applicable international and domestic labour law.*
- 2. States shall in consultation and cooperation with Indigenous peoples take specific measures to protect Indigenous children from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development, taking into account their special vulnerability and the importance of education for their empowerment.*
- 3. Indigenous individuals have the right not to be subjected to any discriminatory conditions of labour and, inter alia, employment or salary.*

Article 21

- 1. Indigenous peoples have the right, without discrimination, to the improvement of their economic and social conditions, including, inter alia, in the areas of education, employment, vocational training and retraining, housing, sanitation, health and social security.*
- 2. States shall take effective measures and, where appropriate, special measures to ensure continuing improvement of their economic and social conditions. Particular attention shall be paid to the rights and special needs of Indigenous elders, women, youth, children and persons with disabilities.*

Article 26

- 1. Indigenous peoples have the right to the lands, territories and resources which they have traditionally owned, occupied or otherwise used or acquired.*
- 2. Indigenous peoples have the right to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired.*
- 3. States shall give legal recognition and protection to these lands, territories and resources.*

Such recognition shall be conducted with due respect to the customs, traditions and land tenure systems of the Indigenous peoples concerned.

Article 32

- 1. Indigenous peoples have the right to determine and develop priorities and strategies for the development or use of their lands or territories and other resources.*
- 2. States shall consult and cooperate in good faith with the Indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.*
- 3. States shall provide effective mechanisms for just and fair redress for any such activities, and appropriate measures shall be taken to mitigate adverse environmental, economic, social, cultural or spiritual impact.*

Article 40

Indigenous peoples have the right to access to and prompt decision through just and fair procedures for the resolution of conflicts and disputes with States or other parties, as well as to effective remedies for all infringements of their individual and collective rights. Such a decision shall give due consideration to the customs, traditions, rules and legal systems of the Indigenous peoples concerned and international human rights.

Section 1.03 Canada's Truth and Reconciliation Commission (TRC)

The Crown's relationship with Indigenous peoples is scarred with many unfortunate legislation and policies. One of the most harrowing policies pertained to education. The Crown's approach to educating Indigenous children, began and continued for over 100 years, was to remove the child from the family in order to have complete control over the enculturation of the child, the purpose of which was "to take the Indian out of the child."

The Government of Canada established its Indian Residential School system in 1868 that was only terminated in the 1970's. The abuse and damage to Indigenous people by the Indian Residential School system was finally the subject of a Royal Commission in 2008. The *Truth and Reconciliation Commission* was part of a holistic and comprehensive response to the charges of abuse and other ill effects for Indigenous children that resulted from the Residential school legacy. The stated goals of the Commission were:

- a) *Acknowledge Residential School experiences, impacts and consequences;*
- b) *Provide a holistic, culturally appropriate and safe setting for former students, their families and communities as they come forward to the Commission;*
- c) *Witness, support, promote and facilitate truth and reconciliation events at both the national and community levels;*
- d) *Promote awareness and public education of Canadians about the Indian Residential School (IRS) system and its impacts;*
- e) *Identify sources and create as complete an historical record as possible of the IRS system and legacy. The record shall be preserved and made accessible to the public for future study and use;*
- f) *Produce and submit to the Parties of the Agreement a report including recommendations to the Government of Canada concerning the IRS system and experience including: the history, purpose, operation and supervision of the IRS system, the effect and consequences of IRS (including systemic harms, intergenerational consequences and the impact on human dignity) and the ongoing legacy of the residential schools;*
- g) *Support commemoration of former Indian Residential School students and their families in accordance with the Commemoration Policy Directive.*

The Truth and Reconciliation Commission made its report public in December 2015. The entire text of the 'Calls to Action' is found in Appendix 2; the following is an excerpt directed at Corporate Canada. (Call to Action #92)

Business and Reconciliation

We call upon the corporate sector in Canada to adopt the United Nations Declaration on the Rights of Indigenous Peoples as a reconciliation framework and to apply its principles, norms, and standards to corporate policy and core operational activities involving Indigenous peoples and their lands and resources. This would include, but not be limited to, the following:

- Commit to meaningful consultation, building respectful relationships, and obtaining the free, prior, and informed consent of Indigenous peoples before proceeding with economic development projects.*
- Ensure that Aboriginal peoples have equitable access to jobs, training, and education opportunities in the corporate sector, and that Aboriginal communities gain long-term sustainable benefits from economic development projects.*
- Provide education for management and staff on the history of Aboriginal peoples, including the history and legacy of residential schools, the United Nations Declaration on the Rights of Indigenous Peoples, Treaties and Aboriginal rights, Indigenous law, and Aboriginal–Crown relations. This will require skills based training in intercultural competency, conflict resolution, human rights, and anti-racism.*

Section 1.04 Values

Naveco's core values are:

- **Trust and Integrity** – at all times we will do what we say, be respectful and be fair in our dealings with others.
- **Performance** – We pursue excellence through our accountability, innovative thinking and ensuring continuous improvement in everything we do.
- **Sustainability** – we acknowledge the impact of human activity on climate and will act to minimize and mitigate our activities on climate change.

Naveco has developed this Indigenous Engagement Policy to align Naveco with best business practices in Indigenous engagement that are guided by the United Nations Declaration on the Rights of Indigenous Peoples, the recent Calls To Action from the Canadian Truth and Reconciliation Commission and Naveco's own Value Statements.

Section 1.05 Application

While the underlying principles of the document apply to all of Naveco's business lines across Canada, the Indigenous Engagement Policy is most applicable in circumstances where projects being undertaken by Naveco have the potential to impact an Indigenous community(s) — the project need not be adjacent to an Indigenous community to have an impact as it may be in the traditional territory where Indigenous peoples maintain rights to carry out traditional pursuits.

As a general contractor and developer, Naveco conducts its work on behalf of clients, typically owners — these might be property developers, governments, resource companies, public utilities or commercial/private business interests. These owners will typically advise Naveco of their expectations in terms of Indigenous engagement, if any. There will also be circumstances where project specific Indigenous engagement is voluntary by Naveco. These circumstances are more typical in urban or suburban areas where the project has no interface with a specific Indigenous community. In these circumstances, Naveco will strive to see its workforce and that of its subcontractors be reflective of the local community, inclusive of the Indigenous population.

Section 2. POLICY STATEMENT

Naveco is proud to adopt the United Nations Declaration on the Rights of Indigenous Peoples as a reconciliation framework and to apply its principles, norms, and standards to corporate policy and core operational activities involving Indigenous peoples and their lands and resources. Naveco strives to be a positive contributor to the overall well-being of Indigenous Peoples and groups with whom we interact through our work across Canada. Naveco intends to do this by respecting and promoting the Rights of Indigenous peoples throughout its operations. Naveco is committed to the following:

- Building respectful relationships and promoting open communication and cultural awareness is fundamental to Naveco's business success and applying these same tenants in its work that interfaces with Indigenous communities.
- Employing a workforce that is diverse, inclusive and one that strives to be representative of the communities in which we work by seeking to recruit Indigenous employees proactively.
- Seeking to increase business opportunities for its Indigenous partners and to build capacity in the Indigenous business community.
- Investing in community programs that support cultural awareness, skill development to increase workforce participation and overall business acumen. Naveco investment may be through in-kind contributions.
- Developing and implementing an Indigenous Engagement Policy for each Naveco project that interfaces with an Indigenous Community.

Naveco has instituted a Cultural Awareness Training Program that is designed to educate its management and employees so that Naveco is better prepared to follow through on its commitment to best practices in Indigenous Relations.

Naveco's management will ensure that sufficient funds and human resources are made available to implement the Indigenous Engagement Policy effectively.

Section 3. CORPORATE MEASURES

Section 3.01 Community Engagement

Naveco will strive to understand the challenges faced by Indigenous peoples and to consider these challenges in its everyday business activities — establishing and building trustful relationships with Indigenous Communities is key to gaining a better understanding.

Policy Statement:

Naveco promotes relationship building, open communication and cultural awareness as fundamental to its business success and will apply these same tenants in its work that interfaces with Indigenous communities.

Strategies:

- Cultural awareness training for Naveco management/employees; and
- Meetings with Indigenous Groups, both community and business, impacted by our projects to gain input on the potential impacts of the project and understand how any negative effects might be mitigated through Naveco's involvement in the project.

Performance Metrics:

- Number of Naveco employees completing cultural awareness training; and
- Number of constructive meetings with Indigenous groups.

Section 3.02 Employment and Training

Goal and Relationship to Naveco Corporate Social Responsibility (CSR) Policy:

The Employment and Training theme is intended to provide training and employment opportunities to Indigenous persons with the broad goal to increase Indigenous employability and employment in Canada. Overall, Naveco is committed to providing a positive and diverse work environment.

Policy Statement:

Naveco is committed to employing a workforce that is diverse, inclusive and that strives to be representative of the communities in which we work. Naveco seeks to recruit Indigenous employees proactively.

Strategies:

- Commit to communicating to the Indigenous community the types of employment opportunities that will be available and determine the most effective way to engage Indigenous candidates;
- Notify Indigenous Government of project-based employment opportunities as early as possible.
- Communicate minimum qualifications for employment;
- Hold community information meetings for employment opportunities and utilize local employment opportunity communication channels to engage potential candidates;
- Ensure that Naveco's internal human resource staff and our trade partners/subcontractors are aware that Naveco is committed to being proactive in the hiring interested and qualified Indigenous employees;
- Assist Indigenous Government in sourcing appropriate training programs that will enable potential Indigenous (and other) employees to meet at least minimum requirements for employment;
- Commit to notifying Indigenous Government of training opportunities internal to Naveco that might be relevant to additional participants from the community; and
- Commit to hiring apprentices.

Performance Metrics:

- Number of Community Information sessions held and number of potential recruits in attendance;
- Efforts expended to communicate Employment opportunities;
- Number of Indigenous Employees by project, region, and affiliation;
- Number of man-hours of Indigenous Employees
- Salary paid to Indigenous Employees by project, region and affiliation, keeping confidentiality intact; and
- Indigenous employees' statistics (number and salary) from Naveco subcontractors.

Section 3.03 Business Development

Naveco has established an Indigenous Contracting and Employment (ICE) program, the purpose of which is to provide opportunities to local, qualified and competitive Indigenous businesses. Where businesses do not exist, we commit to seek opportunities to employ local Indigenous contractors through our lead contractors. By engaging these local Indigenous businesses and people in our work activity, we are facilitating positive relationships with the Indigenous populations, thereby reducing

the chance of community action in opposition to a Naveco project. A proactive engagement strategy helps to ensure access to the land for construction and enhances future capacity within the communities that will carry forward into our operations and support for further capital projects.

Policy Statement:

Naveco seeks to increase business opportunities for Indigenous businesses and to build capacity in the Indigenous business community.

Strategies:

The overarching architecture for ensuring inclusion of Indigenous businesses is built on a supply chain management policy that requires lead contractors to submit an Aboriginal Inclusion Plan (AIP) defining contracting, employment and training opportunities on a project. The criteria for evaluating an AIP will be on the quality, quantity and specificity of the Indigenous ownership, employment and contracts.

Upon award and throughout the implementation of the work, Naveco will ensure that the lead contractor successfully implements the Plan. This will be achieved through regular weekly project update meetings as scheduled with the Project Team. Throughout the execution of the project, the lead contractor will track Indigenous spend, and provide regular spend reports to Naveco.

Naveco or its lead contractor(s) will manage the cost of, quality of, and schedule for the work being executed, in part, by using only qualified Aboriginal businesses and awarding work based on best total value using a competitive and commercially transparent process.

To participate in the Designated Activity opportunities for Project work, contractors/suppliers must be an Indigenous business. The criteria for being designated as an Aboriginal business, is that a contractor/supplier must have either at least 50% Indigenous ownership or a determination by Naveco, in its sole discretion, that the business has significant Indigenous ownership.

Naveco will communicate with Indigenous Governments concerning business opportunities that will be available and determine the most effective way to engage Indigenous businesses, that may include:

- Community information meetings for business opportunities;
- Ensuring that Naveco's internal procurement team and trade partners/subcontractors are aware that Naveco is committed to procuring goods and services from qualified Indigenous businesses;

- Ensuring Indigenous businesses are afforded the opportunity to be a supplier to Naveco and all other factors being equal, commit to a preference for procuring goods and services from these businesses;
- Identifying existing Indigenous businesses in target areas and develop partnerships with these businesses to build business capacity in the Indigenous business and to provide more business opportunities for our partner and Naveco. Target areas are communities or regions where Naveco is planning to perform or is performing work; and
- Seeking the guidance and support of the Indigenous Governments to identify businesses that fit the target partner description — desirable attributes would be existing capacity in the contracting business and a willingness to partner to build capacity.

Performance Metrics:

Effort (meetings, advertisements, direct communication) expended to communicate business opportunities to Indigenous businesses:

- Value of procurement of goods/services from Indigenous businesses overall and as a percentage of project value; and,
- Number of Indigenous Partnerships, securement ratios of pursuits with Indigenous partners, revenue and profit from each.

Section 3.04 Community Investment

The goal is to assist Indigenous communities with programs supported by the community that advance the betterment of the community.

Policy Statement:

Naveco commits to invest in community programs that support cultural awareness and skill development to increase workforce participation and overall business acumen. The Naveco investment may be in-kind. The magnitude of investment may vary from project to project.

Strategies:

- Through communication with representatives of the Indigenous Government, identify existing programs that assist in skill development for the workforce and business acumen. Naveco will seek to support these programs;
- Where gaps exist in programming, Naveco will contribute to bridging the gaps;
- Naveco may consider contributions to other organizations that are already providing skill development programming — in this instance, Naveco will seek

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the guidance of the Indigenous community Government to ensure that assistance is provided to appropriate organizations; and

- As a general rule, the magnitude of the investment will be in line with Naveco's role in the project – Community investment will be proportional to Naveco's business involvement.

Performance Metrics:

- Number of programs supported;
- Number of presentations made in the community;
- Amount of cash expended and value (cost) of human resource effort directed at specific community programs; and
- Results of investment — long term monitoring.



Indigenous Engagement Plan

Principals & Goals



Building Respectful Relationships

Open communication and cultural awareness is fundamental to Naveco's business success.



Employing a Diverse Workforce

Employing a workforce that is diverse, inclusive and strives to be representative of the communities.



Indigenous Business Opportunities

Increase business opportunities and build capacity in the Indigenous community.



Invest in Community Programs

Invest in programs that support cultural awareness, skill development, and overall business acumen.

Implementation

Naveco will begin early contact of Indigenous leaders, elders & council, and representative organizations to introduce and confirm potential interest in potential projects.

- ✔ Share project information
- ✔ Gather input
- ✔ Funding agreements
- ✔ Ecological knowledge and land use
- ✔ Integration of Indigenous knowledge

Overview

At Naveco we acknowledge and appreciate the Indigenous rights to land and resources, their values, and the contributions of Indigenous peoples to building a strong and resilient economy. We will engage Indigenous peoples and their governments to support and contribute to the reconciliation process by respecting the Indigenous worldview and offering economic opportunities where and when appropriate

BUILDING AND MAINTAINING POSITIVE LONG-TERM RELATIONSHIPS



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