

April 30<sup>th</sup>, 2026

## FAST-41 Initiation Notice (FIN) Ambler Metals Corporation - Arctic Project

### 1.0 Summary

Ambler Metals LLC (AMC) is a joint venture partnership between Trilogy Metals Inc. (Trilogy) and South32 Limited (South32). AMC proposes to access and recover ore by developing the Arctic Mine Project (Project), an open pit mine at the Arctic Deposit in the Ambler Mining District (Ambler District). AMC's purpose for the Project is to profitably extract commercial quantities of critical and strategic minerals including copper, zinc, lead, and other valuable minerals from the Arctic Deposit ore reserves. The Project is nominally designed to process approximately 11,000 short tons per day (t/d) (10,000 tonnes per day [tonnes/d]) of ore to produce three primary concentrates: 1) copper, 2) zinc, and 3) lead. Per the 2022 Pre-Feasibility Study Update, the total life-of-mine 13-year production is projected at 1.9 billion pounds of copper, 2.2 billion pounds of zinc, 335 million pounds of lead, 423,000 ounces of gold and 36 million ounces of silver<sup>1</sup>. In addition to producing significant quantities of minerals through domestic supply chains, the Project would also enable AMC to work with its partner, the NANA Regional Corporation (NANA) to provide significant economic benefits to NANA's Alaska Native shareholders.



Figure 1: Project Map

<sup>1</sup> Ausenco Engineering Canada, Arctic Project Technical Report and Feasibility Study, January 20<sup>th</sup>, 2023

## 2.0 Project Description

### 2.1 General Location, and Geospatial Information

The Project is located in the Northwest Arctic Borough (Borough) approximately 168 miles (270 kilometers [km]) east of Kotzebue, 22 miles (36 km) north of Kobuk, and 162 miles (260 km) west of the Dalton Highway (Figure 1). Concentrates would be transported in sealed containers from the Project site along an AMC constructed access road to the Amber Access Project to the Dalton Highway. From the Dalton Highway, the trucks would proceed to Fairbanks where the concentrates would be offloaded onto rail cars and transported to an Alaskan Port for shipping to final processing.

### 2.2 Project Description

The mine site is located in the Subarctic Valley in the foothills of the Brooks Range, with most of the mine infrastructure sited within the Subarctic Creek watershed, a tributary to the Shungnak River (Figure 2).

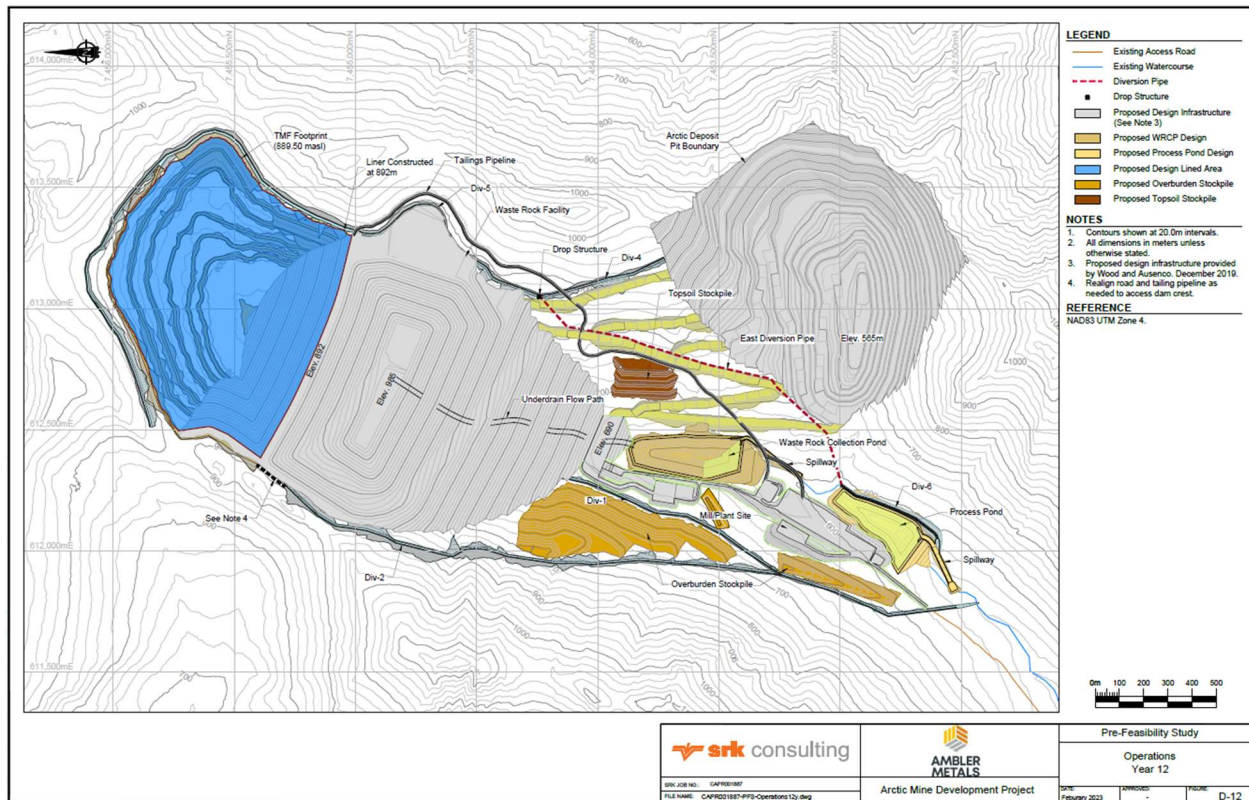


Figure 2: Operations Year 12 Map

The mine site includes State mining claims and patented-Federal mining claims. There are no Federally managed lands associated with the Project area. The mine will consist of an open pit and processing facilities, including crushing, grinding, and flotation that would produce the copper, zinc, and lead concentrates. Tailings from the mill will be stored in a fully lined tailings management facility (TMF) with a dam built in stages using downstream construction. The design is consistent with the Global Industry Standard for Tailings Management (GISTM). Waste rock would be managed in a Waste Rock Facility (WRF) immediately downstream from

the TMF. Runoff and seepage from the TMF, WRF, and other mine site facilities would be collected in the waste rock control pond (WRCP) located below the WRF. A double lined pond would also be used to store process water. All contact water would be fully contained and used to the maximum extent practicable in the mining and processing operations. Excess water would be pumped from the WRCP to a water treatment plant that would ensure the discharge to Subarctic Creek meets all applicable water quality standards. The mine site would also include maintenance facilities, power generation, diversion channels, and other infrastructure.

At closure, the TMF would be dry closed and then covered and reclaimed. The WRF would also be covered and reclaimed. The WRCP would remain to collect any continuing contact water and TMF and WRF seepage. From the WRCP, water would be pumped to the open pit, which would be the primary water management facility after closure. Excess water from the pit lake would be pumped to the water treatment plant that would continue to discharge to Subarctic Creek. All facilities and areas not needed for long-term post-closure care and maintenance would be decommissioned and reclaimed.

The Project will provide expanded economic opportunities in the Borough, a region of Alaska where mining has produced significant benefits primarily realized through the Red Dog Mine's operations for the past 40 years. Portions of the area located south of the mine site that would be used for infrastructure development are owned by the NANA Regional Corporation (NANA). AMC has a long-term agreement with NANA that provides for partnership in the development of the Project and the overall Ambler District. This agreement includes direct financial benefits to NANA as well as preferences for shareholder hiring and contracting. To date, AMC has maintained a strong track record of hiring NANA shareholders and using NANA businesses throughout the exploration phase of the Project.

### **2.3 Planned Project Infrastructure**

Development of the Project will include the construction of several infrastructure components. The open pit mine would require 3 miles of access roads between the pit, WRF, ore storage stockpile, and mill facilities. The mill facilities include an enclosed coarse ore crusher, processing plant, water treatment plant, administration building, truck shop, and concentrate loadout facility. Power generation and fuel storage will also be constructed and operated at the millsite location.

Project access will include the construction and operation of two main access roads: the North and South Routes. The North Route, a 13.6-mile new gravel access road, will connect the mine site to the AAP junction and will be used by the mining fleet and concentrate hauling vehicles. The South Route, with 2.8 miles of new gravel road and 10.6 miles of existing road improvements, will connect AAP with Bornite Camp and the Dahl Creek airstrip and will be used by light duty trucks and personnel vehicles.

Accommodations will be provided initially at the Temporary Construction Camp (TCC), located near the AAP junction on the North Route and eventually at the Permanent Accommodations Facility (PAF) located 0.8 miles north of the AAP junction (Figure 3).

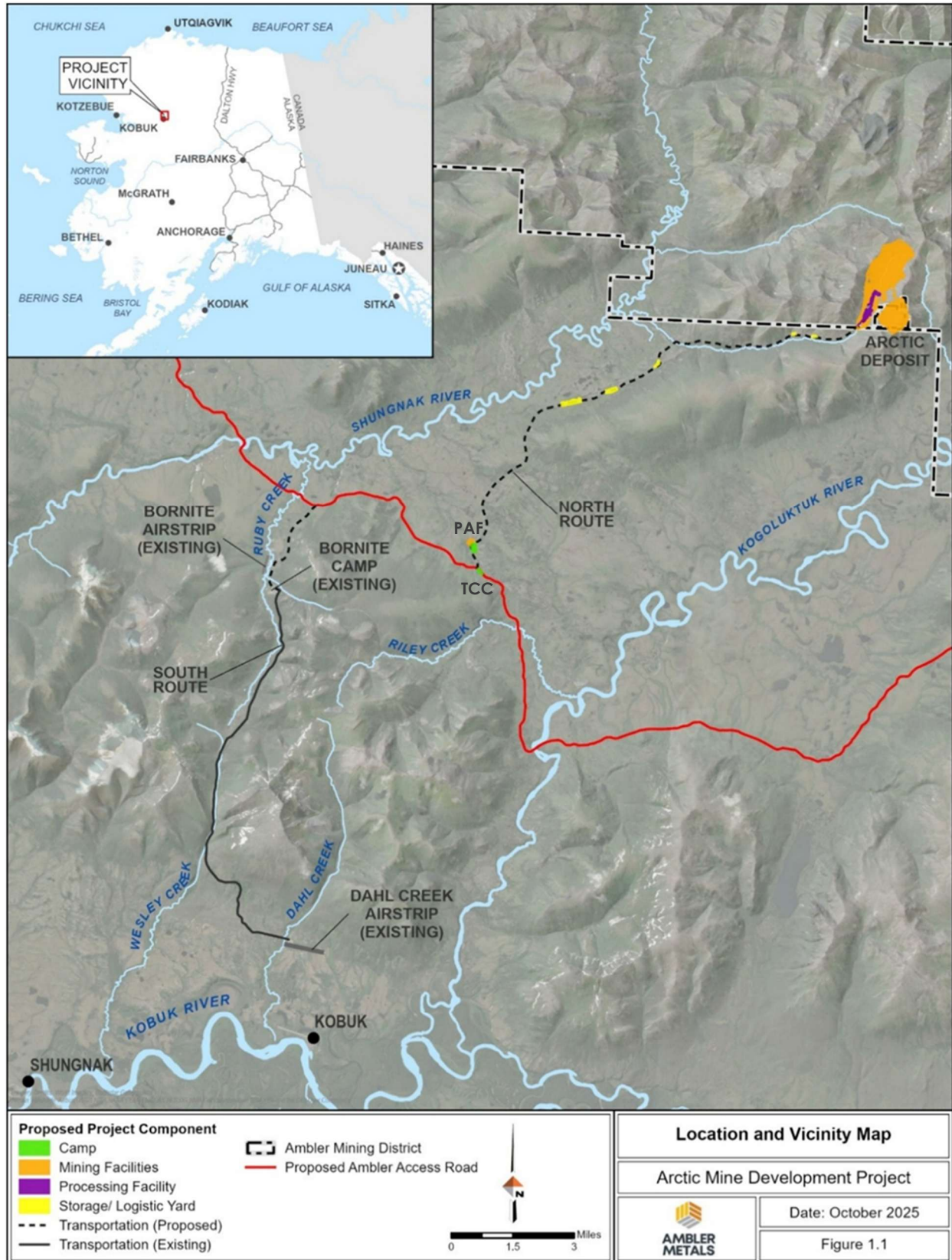


Figure 3: Project Infrastructure

## **2.4 Environmental Resources**

AMC has collected a wide range of environmental data to support the permitting of all Project components over more than two decades. This includes more than 10 years of baseline biomonitoring and water quality data in the Subarctic Creek and Shungnak River drainages. Additionally, numerous hydrologic studies have been conducted to establish flow and water quality conditions for surface and groundwater modelling. Further data collection has included comprehensive climate, air quality, soils, wetlands, vegetation, and wildlife studies.

## **2.5 Cultural Resources**

Alaska Natives have inhabited the rural Project area for thousands of years practicing traditional ways of life. AMC has developed information on the existing socioeconomic conditions in the region and the potential effects of the Project. The Iñupiaq communities of Ambler, Kobuk, and Shungnak rely on subsistence resources near the Project area to obtain a healthy and predictable food source. The Project also has a Subsistence Advisory Committee consisting of residents from the villages who advise on subsistence resources and their uses and provide input on project design and operations. In addition, the Alaska Department of Fish and Game conducted a comprehensive survey of subsistence users in the communities of Ambler, Kobuk, and Shungnak to document the use, harvest, and sharing of fish, terrestrial and marine mammals, marine invertebrates, birds, and wild plants and berries.

## **2.6 Historic Resources**

Three cultural resources surveys have been performed in the proposed Project area including background research and fieldwork. No pre-Contact archaeological resources were found during the surveys and only historic mining properties have been identified to date. AMC will conduct additional surveys in 2026 to address any additional information needs for permitting.

## **3.0 Project Sponsor's Technical and Financial Ability to Construct the Project**

### **3.1 Technical Expertise**

AMC has the technical expertise and operational experience required to advance the development and long-term operation of the Project. Our team includes seasoned professionals with demonstrated success in complex mining environments, including engineering, environmental management, administration, logistics, and remote infrastructure development. AMC's owners also bring some of the most experienced mining professionals in the business having led development and operation of large open pit critical and strategic mineral mines. In addition to our in-house capabilities, we maintain strong partnerships with industry experts and contractors who have worked extensively in Alaska, and we have the organizational capacity to recruit and retain the specialized technical talent necessary to support the Project's evolving needs. This depth of capability helps us to execute the Project safely, efficiently, and in accordance with all regulatory and environmental requirements.

### **3.2 Financial Capability**

As indicated above, AMC has 50/50 ownership by Trilogy and South32, who have the financial strength and commitment necessary to support the successful construction of the Project. The Project has an estimated capital cost of approximately \$1.3 billion (Ausenco 2023). As of April 30, 2026, South32 had a market capitalization of \$13.3 billion and Trilogy of \$753 million. Both

owners have a track record of financing large-scale mining ventures and carry the capacity to secure additional capital through established relationships with global financial institutions, strategic partners, and equity markets. Their combined financial resources, prudent fiscal management, diverse experience in mine operations, project evaluations, and longstanding commitment to responsible development ensure that the Project can be advanced to completion and into operations in a manner that meets all operational, environmental, and regulatory obligations.

## **4.0 Federal Financing and Authorizations and Related State Authorizations Pending**

### **4.1 Federal Financing**

AMC does not currently have, nor has it requested, direct federal financing for the Project. On October 6, 2025, Trilogy and South32 entered into a binding letter of intent with the US Department of War for the U.S. government to invest approximately \$35.66 million to acquire a 10 percent interest in Trilogy. On March 30, 2026, the parties amended the letter of intent to extend the deadline to finalize the transaction to May 31, 2026, to allow additional time for the completion of certain closing conditions.

### **4.2 Federal Authorizations**

The Project will impact approximately 121 acres of jurisdictional Waters of the United States (WOTUS) and therefore will need Department of the Army (DA) authorization under Section 404 of the Clean Water Act. A DA permit application was submitted to the U.S. Army Corps of Engineers (USACE) Alaska District on April 20, 2026. Issuance of this permit will require compliance with the National Environmental Policy Act (NEPA), the National Historic Preservation Act (NHPA), the Magnuson-Stevens Fishery Conservation and Management Act, and the Endangered Species Act (ESA). No threatened or endangered species has been identified in the immediate Project area. Because of the cultural significance of the area, Section 106 consultation is expected to be required under the NHPA.

Because of the possibility of significant impacts on environmental, social, and cultural resources, AMC believes that preparation of the Environmental Impact Statement (EIS) could be warranted. Specifically, AMC anticipates that an EIS would address the following potential effects: (1) long-term management of acid rock drainage and need for active water treatment, (2) stability of the large TMF, (3) effects on caribou and other important subsistence resources, and (4) changes to socioeconomics and ways of life in the region.

More broadly, for new large natural resource developments like the Project, local stakeholders have come to expect preparation of an EIS. They assume this will provide a thorough, transparent analysis of potential effects as well as affording multiple opportunities for public input. Anything less detailed would be perceived as not recognizing how the Project may significantly impact their lands, waters, and ways of life.

Finally, the Fiscal Responsibility Act and NEPA limit the Federal EIS and permit evaluation process to 2 years. This timeframe is very consistent with AMC's broader efforts, including additional engineering studies, to reach a construction decision. It also coordinates well with the timeframes required to complete the State permitting; State authorizations are planned to be issued soon after the Record of Decision as discussed in Section 4.3. An EIS would fully support the completion of each State permit and review.

### 4.3 State Authorizations

The Project requires a number of State authorizations and reviews from the Alaska Departments of Environmental Conservation (ADEC), Natural Resources (ADNR), and Fish and Game (ADF&G). These are listed in Table 4-1:

**Table 4-1: Major State Authorizations and Reviews**

| Permit/Authorization          | Agency |
|-------------------------------|--------|
| Air Quality Permits           | ADEC   |
| Integrated Waste Permit       | ADEC   |
| APDES Permit                  | ADEC   |
| 401 Certification             | ADEC   |
| Reclamation Plan Approval     | ADNR   |
| Water Rights                  | ADNR   |
| Dam Safety Certifications     | ADNR   |
| Rights of Way and Leases      | ADNR   |
| NHPA/SHPO Review              | ADNR   |
| Title 16 Fish Habitat Permits | ADF&G  |

On August 27, 2025, the Federal Permitting Improvement Steering Council (Permitting Council) and the State of Alaska released a Memorandum of Understanding (MOU) that provides for cooperation under FAST-41. The MOU also indicates that “the Permitting Council will help the State and any appropriate facilitating or lead agency to leverage the state “opt-in” provision at 42 U.S.C § 4370m-2(c)(3) and post state environmental reviews and authorizations to the Permitting Dashboard.”

Based on initial discussions with the Permitting Council, USACE, and the State, AMC would like to use the opt-in provision and work to integrate the plans and schedules for each of the above reviews and authorizations into the published Federal permitting plan. As noted above, AMC has prepared draft schedules for each of these that are aligned with the completion of the NEPA and Federal permitting process.

### 5.0 Qualifications for FAST-41

The Project qualifies as a “covered project” because: it is an activity in the United States that requires environmental review by a Federal agency involving construction of infrastructure for mining and conventional energy production (i.e., it falls within a designated sector). The Project specifically meets the standard pathway at 42 U.S.C. 4370m(6)(A)(i) because it is: (i) subject to NEPA, as required for issuance of the Section 404 permit by USACE; (ii) likely to require a total investment of more than \$200,000,000 – it has an estimated capital cost of approximately \$1.3

billion; and (iii) does not qualify for abbreviated authorization or environmental review processes under any applicable law.

## **6.0 Contact Information**

Ron Rimelman  
Senior Director, Permitting  
Ambler Metals Corporation  
303-884-1823  
Ron.rimelman@amblermetals.com

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald Rimelman", with a stylized flourish at the end.

Ron Rimelman  
Senior Director, Permitting