



Denison Mines Corp.  
Wheeler River Operation

## **Public and Indigenous Information Program**

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## Approval for Use

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## Revision History

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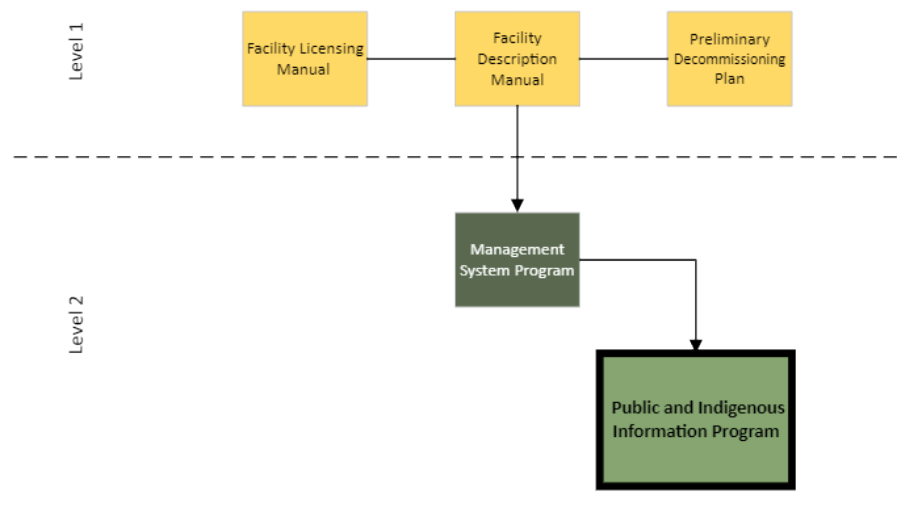
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# 1 Introduction

The *Public and Indigenous Information Program* (the Program) is one of twelve Program documents that comprise the Management System for the Wheeler River Operation (the Operation). The *Public and Indigenous Information Program* is preceded by the *Management System Program* within the document framework for the Operation as shown in **Figure 1**. Consistent with all other Program documents, the *Public and Indigenous Information Program* is organized according to the 'Plan-Do-Check-Act' iterative process to incorporate continual improvements in all stages of the Program.



**Figure 1: Program shown within Document Framework for the Wheeler River Operation**

## 1.1 Purpose

The Program outlines Denison's policy, principles, and plan to communicate with Indigenous groups and members of the public in support of the development and maintenance of meaningful relationships in relation to the Operation, while also ensuring that information related to the health, safety and security of persons and the environment, and other issues associated with the lifecycle of nuclear facilities are effectively communicated more broadly. Denison's Public Disclosure Protocol is also defined within this Program.

The Program will be commensurate with the public perception of risk and the level of public interest in the Wheeler River Operation.

## 1.2 Scope

Overall objectives of the Program include:

- Encouraging early information-sharing about the Wheeler River Operation to address the perceived risk to health and safety of the workers, the public and the environment from the Wheeler River Operation;
- Providing an opportunity for two-way sharing of information;

- Communicating key Denison business decisions as they relate to the Wheeler River Operation;
- Providing opportunities for Interested Parties and the public to engage with Denison to discuss potential issues, raise concerns, ask questions, and provide comments regarding current and proposed activities for the Wheeler River Operation; and
- Provide Denison an opportunity to address comments, concerns, and questions.

### 1.3 Denison's Indigenous Peoples Policy

In 2021, Denison officially adopted its Indigenous Peoples Policy (IPP). The IPP reinforces Denison's recognition of the significant role Canadian businesses play in the process of reconciliation with Indigenous peoples in Canada. The IPP was developed in collaboration with Indigenous communities with whom Denison has established meaningful partnerships, ensuring the IPP represents a mutual vision for reconciliation and engagement. The IPP identifies five key areas of action that will support the ongoing development and evolution of a Reconciliation Action Plan (RAP): Engagement; Empowerment; Environment; Employment; and Education. Through the RAP and IPP, Denison is actively working to intertwine the principles of reconciliation throughout all areas of the company's operations, activities and initiatives. A copy of Denison's IPP may be found under the Corporate Governance section of the Denison website (<https://denisonmines.com/about-us/corporate-governance/>).

The *Public and Indigenous Information Program* is developed in accordance with the Denison IPP and acts as an important tool for the continuing engagement and collaborative participation between Denison and Indigenous Groups and members of the public.

### 1.4 Compliance with Regulatory Requirements

This Program is compliant with the *Nuclear Safety Control Act*, S.C. 1997, c. 9 ("NSCA") and its associated regulations. The Program also follows guidance and requirements in the Canadian Nuclear Safety Commission (CNSC) REGDOC-3.2.1 *Public Information and Disclosure* and REGDOC-3.2.2 *Indigenous Engagement*.

### 1.5 Location

The Operation falls within the boundaries of Treaty 10, the Nuhtsiye-kwi Benéne (Ancestral Lands) of English River First Nation, the traditional territory of the Kineepik Métis Local #9, the homeland of the Métis, and within Nuhenéné, the Athabasca Denesųliné territory. The Operation is also located within the Northern Saskatchewan Administration District (see Figure 3). The Northern Administration District (NAD) includes approximately 250,000 km<sup>2</sup> (44% of Saskatchewan's land area) and is home to approximately 36,000 people (3.2% of Saskatchewan's population) (Denison, 2022).

Northern Saskatchewan poses a particular challenge in terms of public information as it features low populations spread across a vast geographic region. As noted, the NAD is comprised of approximately half of Saskatchewan's land area but is home to less than four percent of the province's population, or roughly 36,000 people. The communities encompassed within the NAD include Indigenous, Métis, and other municipalities.

Denison's *Public and Indigenous Information Program* focuses on the Indigenous groups and members of the general public located in the regional area surrounding the Wheeler River Operation, particularly the communities or reserves in closest proximity to the Operation.



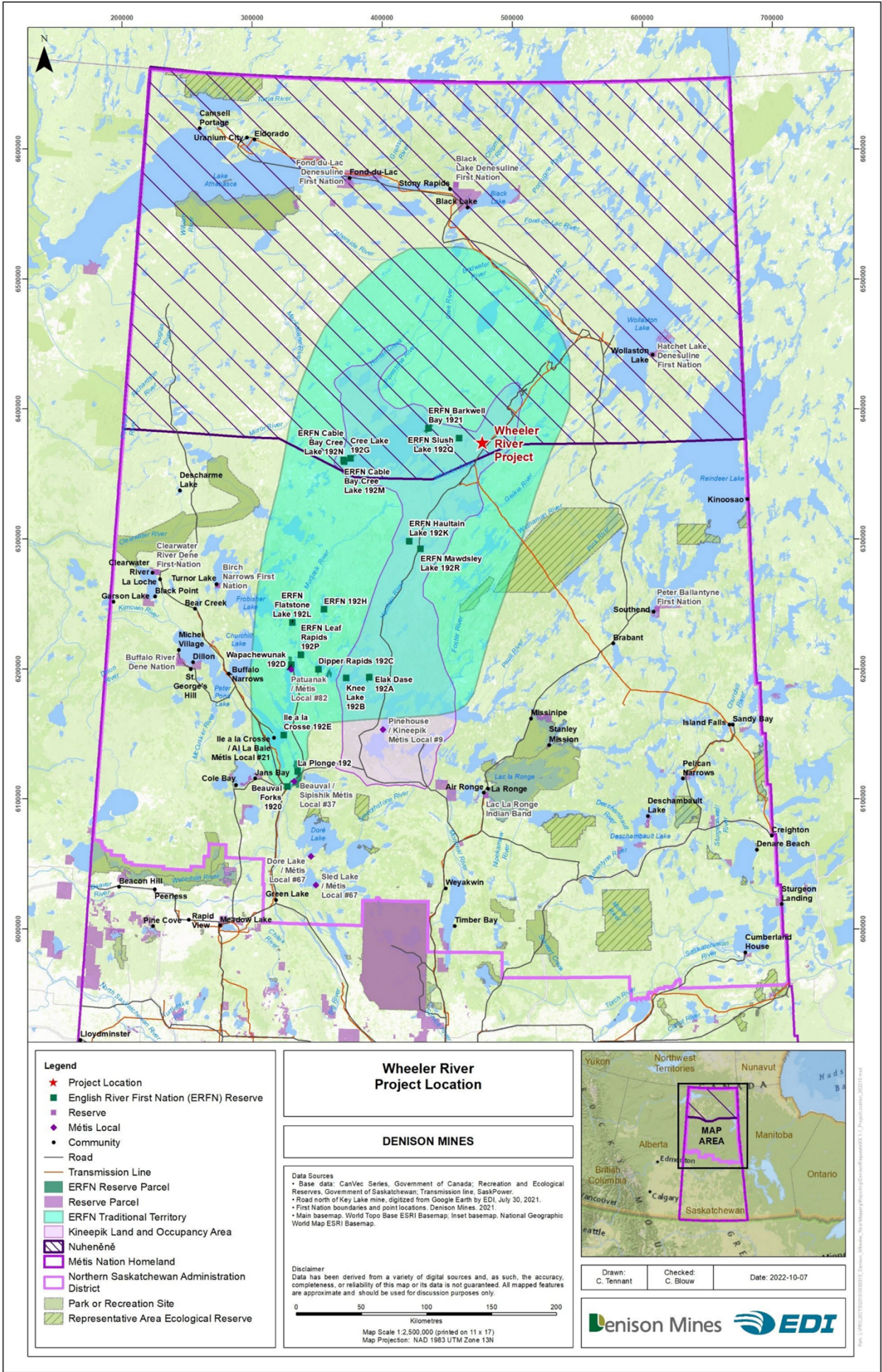


Figure 2: Wheeler River Operation in Relation to Traditional Territories



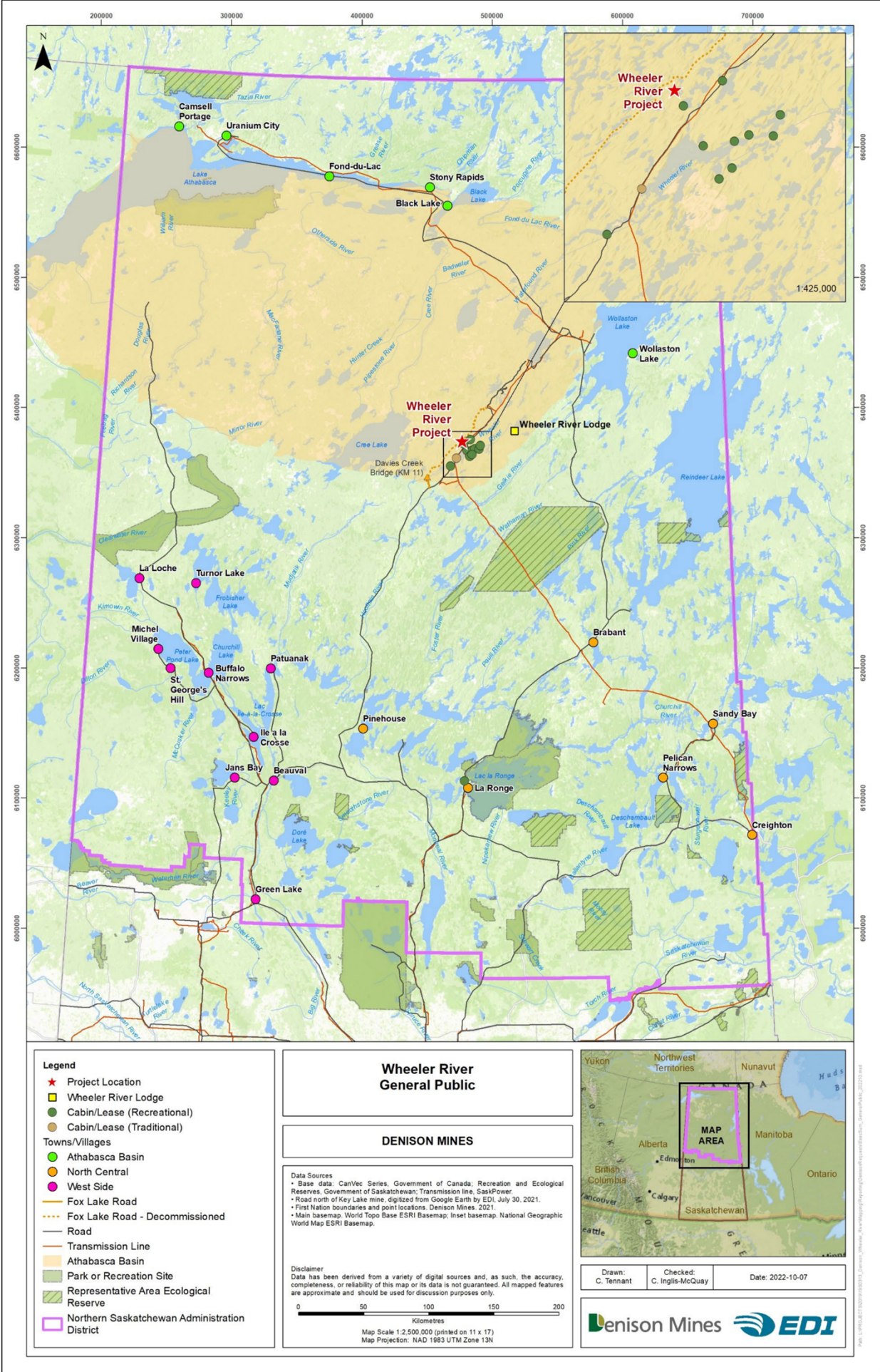


Figure 3: Communities within the Northern Saskatchewan Administrative District and Leases in Proximity to the Operation

## 1.6 Terminology

### 1.6.1 Definitions

**Table 1-1: Definitions**

| Term                                     | Definition  |
|--|---|
| Indigenous Community of Interest         | A community whose traditional land or potential or established Aboriginal and/ or Treaty rights are in proximity to the Operation or has existing transportation infrastructure that would be used by the Operation. An Indigenous Community of Interest is more likely to experience impacts from the Operation.   |
| Interested Party                         | A person or entity with an interest of concern in relation to a Denison activity. (This term is often used interchangeably with the term <i>stakeholder</i> ).  |
| Modern/Technological Communication Tools | Communication tools that utilize computers and/or smartphones to disseminate and access information over the internet, such as websites, email, social media, web-based video sharing or other online content.  |
| Non-Indigenous Community of Interest     | A municipality or other non-Indigenous community located near the existing transportation infrastructure utilized by the Operation. A Non-Indigenous COI may experience efforts by Denison to offer employment, training, and business opportunities in connection with the Operation and therefore may experience positive socioeconomic impacts as a result of the Operation. |
| Public Disclosure Protocol               | A document that describes the information and the medium of disclosure in regard to information and reports of interest to the public. The public disclosure protocol is a regulatory requirement of the CNSC's REGDOC-3.2.1: Public Information and Disclosure.  |
| Social Media                             | Online media in which users can easily participate, share and create content, including blogs, social networks, wikis, forums and virtual worlds.   |
| Target Audience                          | Includes Indigenous and non-Indigenous communities, groups, organizations, and other members of the public identified by Denison for targeted communications regarding Operation activities through the <i>Public and Indigenous Information Program</i> .  |
| Traditional Communication Tools          | Communication tools that utilize older, established technologies to disseminate information, such as print materials (newspapers, newsletters, posters, etc.), telephone communications, or radio broadcasts.   |

### 1.6.2 Acronyms and Abbreviations

**Table 1-2: Acronyms and Abbreviations**

| Acronym or Abbreviation | Term                               |
|-------------------------|------------------------------------|
| CNSC                    | Canadian Nuclear Safety Commission |
| COI                     | Communities of Interest            |

| Acronym or Abbreviation | Term  |
|-------------------------|---|
| ERFN                    | English River First Nation                                |
| ESG                     | Environmental, Social and Governance                      |
| IPP                     | Indigenous Peoples Policy                                 |
| ISR                     | In-situ Recovery  |
| KML                     | Kineepik Métis Local #9                                   |
| MLTC                    | Meadow Lake Tribal Council                                |
| MN-S                    | Métis Nation – Saskatchewan                               |
| MS                      | Management System   |
| NAD                     | Northern Saskatchewan Administration District             |
| NLMC                    | The Northern Labour Market Committee                      |
| NSCA                    | Nuclear Safety and Control Act                            |
| NSEQC                   | The Northern Saskatchewan Environmental Quality Committee |
| PAGC                    | Prince Albert Grand Council                               |
| Program                 | Public and Indigenous Information Program                 |
| RAP                     | Reconciliation Action Plan                                |
| SMA                     | The Saskatchewan Mining Association                       |
| YNLR                    | Ya'thi Néné Land and Resource Office                      |

## 2 Plan

### 2.1 Risk Management

The communication tools and methods outlined throughout this Program provide information related to Denison's activities and help address perceived environmental, health and safety risks to the target audiences. No one tool or method can satisfy the information and communication needs of all groups or target audiences; thus, a coordinated strategy using several communication tools and methods is required to ensure all groups are sufficiently informed of relevant information related to the Operation's activities.

It is crucial to note that each of these communication tools and methods is intended to help explain Denison's Operation activities, as well as their identified or perceived risks and benefits. Although the activities associated with mining and milling involves certain risks, they can be minimized through proper planning, a continual focus on safety, innovation and adherence to environmental and safety regulations and industry best practices. Furthermore, misconceptions exist regarding risks associated with nuclear energy production and uranium mining and milling, which communications distributed as part of this Program are also intended to address.

### 2.2 Objectives and Targets

Program objectives are developed in accordance with the CNSC Regulatory Standards *REGDOC-3.2.1 Public Information and Disclosure* and *REGDOC-3.2.2 Indigenous Engagement*, as well as the Denison *Management System Program*. Program objectives and targets will consider Denison's IPP and engagement principles.

Objectives and targets developed for the *Public and Indigenous Information Program* will be measurable, documented and tracked. Program performance against the objectives and targets will be consistently assessed and communicated at regular intervals (i.e., during Management Review), and opportunities for continual improvement will be identified.

### 2.3 Target Audiences

Denison has developed long-standing relationships with many residents and organizations in northern Saskatchewan over the course of Operation planning. Knowledge of continued interest, proximity to the site, and land use have generally informed the current Target Audiences identified for this Program. These are identified in the following subsections.

#### 2.3.1 Indigenous Engagement

Denison has identified various Indigenous groups in respect of the Operation using an approach consistent with methods described in the CNSC Regulatory Standard *REGDOC-3.2.2 Indigenous Engagement*. Indigenous groups were also identified by utilizing Denison's understanding of the regional area and information gathered from past engagement activities. To ensure thoroughness, publicly available activities conducted by neighbouring facilities licensed by the CNSC were also reviewed to identify or verify Indigenous groups of interest.

When considering Indigenous groups for engagement with the Operation, Denison considers:

- Historic and modern treaties;



- Proximity of the Operation to Indigenous groups;
- Traditional territories;
- Traditional and current land uses near the Operation;
- Existing relationships between Indigenous groups and Denison or the CNSC;
- Membership in a broader Indigenous collective or tribal council or Indigenous umbrella group;
- Settled or ongoing land claims;
- Settled or ongoing litigation related to a potentially impacted group; and
- Potential impacts to the health and safety of the public, the environment and any potential or established Indigenous and/or treaty rights and related interests.

The identification of Indigenous groups is further informed through direct communication with Indigenous leaders, community members, and other collective Indigenous organizations. Reviews of publicly available information and assistance from regulatory and government agencies further supports Denison's efforts to engage with potentially impacted and interested Indigenous groups.

#### **2.3.1.1 Indigenous Groups**

Indigenous groups that were identified are further refined into three categories, namely Indigenous Communities of Interest (COI), Other Indigenous Communities, and Indigenous Organizations. The following criteria were used to appropriately evaluate Indigenous communities that would be engaged by Denison as Indigenous COI:

- Treaty 10 signatory (Treaty in which the Operation is located);
- Potential or established Indigenous and/or Treaty Rights within the Project Area;
- Geographic proximity of community and/or reserve land to the Project site;
- Known traditional territory in and around the Project site;
- History of relationship with operating companies, the CNSC, and the Province in relation to other projects located near the Operation (McArthur River, Key Lake, Millennium); and
- The potential for collective exercising of Indigenous and/or Treaty Rights in proximity to the Operation.

Denison recognizes that other Indigenous communities exist with a potential interest in the Operation, including Indigenous communities that have been identified by a regulatory agency as having potential interest in the Operation. These Indigenous communities do not meet Denison's criteria for classification as an Indigenous COI for the Operation but are nonetheless included as Other Indigenous Communities as part of the Program.

Denison also acknowledges that there exists local and regional Indigenous Organizations that often represent the interests of many different Indigenous communities, including those of Indigenous COI. These organizations can provide a single point of contact for Denison to share information more broadly to a wide variety of Indigenous communities and their leadership regarding Operation and company information. These organizations can also provide specific information regarding their members, interests their members may have, and opportunities for Denison to work collaboratively together on various initiatives. These Indigenous Organizations are included in the Program as a distinct category.



### **2.3.1.2 Summary of Indigenous Groups Identified for Engagement**

Based on these considerations, the following Indigenous groups have been identified accordingly:

- Indigenous Communities of Interest (COI)
  - English River First Nation (“ERFN”)
  - Kineepik Métis Local #9 (“KML”)
  - Sipishik Métis Local #37
  - Patuanak Métis Local #82
- Other Indigenous Communities
  - Birch Narrows Dene Nation
  - Buffalo River Dene Nation
  - Lac La Ronge Indian Band
  - Fond du Lac First Nation
  - Black Lake First Nation
  - Hatchet Lake First Nation
  - Dore/Sled Lake Métis Local #67
  - A La Baie Métis Local #21
  - Peter Ballantyne Cree Nation
- Indigenous Organizations
  - Métis Nation – Saskatchewan (“MN-S”)
  - Ya’thi Néné Land and Resource Office (“YNLR”)
  - Meadow Lake Tribal Council (“MLTC”)
  - Prince Albert Grand Council (“PAGC”)

## **2.3.2 Engagement with Members of the General Public**

### **2.3.2.1 General Public Groups**

For the Program, the General Public classification focuses on four groups:

- Non-Indigenous COI;
- Other Non-Indigenous Communities;
- Nearby Land Users; and
- Organizations.

Non-Indigenous COI and Other Non-Indigenous Communities include municipalities or non-Indigenous communities located near the existing transportation infrastructure used by the Operation that may experience efforts by Denison to offer employment, training, and business opportunities in connection

with the Operation and, therefore, may experience socioeconomic effects from the Operation. Nearby Land Users include commercial trappers or fishers, cabin/lease owners, or commercially operated lodges in the vicinity of the Operation that have the potential to experience effects from the Operation. Organizations collectively refers to local and regional organizations that represent various interests relevant to the Operation.

### **2.3.2.2 Summary of General Public Groups Identified for Engagement**

General Public groups were identified based on their proximity to the Operation. The following lists the various General Public groups identified for engagement:

- Non-Indigenous Communities of Interest (COI)
  - The Northern Village of Pinehouse Lake
  - The Northern Village of Beauval
  - The Northern Hamlet of Patuanak
- Other Non-Indigenous Communities
  - The Northern Village of Île-à-la-Crosse
  - The Northern Hamlet of Stony Rapids
  - The Northern Settlement of Uranium City
  - The Northern Settlement of Camsell Portage
  - The Northern Settlement of Wollaston Lake
- Nearby Land Users
  - Commercially licensed trappers and fishers
  - Cabin / lease owners
  - Commercially operated lodges
- Organizations
  - The Northern Saskatchewan Environmental Quality Committee (“NSEQC”)
  - The Saskatchewan Mining Association (“SMA”)
  - The Northern Labour Market Committee (“NLMC”)

### **2.3.3 Other Members of the Public**

Other members of the public include other parties from the general public with direct interests in the Operation. These include, but are not limited to:

- Local, regional, and national media and news organizations, including Indigenous-focused media and news organizations;
- Municipal, provincial and federal politicians;
- Other community leaders, influential persons, or political/activist groups; and
- Local businesses.

## 2.4 Public and Media Opinion

Through this Program, Denison will use various tools and strategies to obtain public and media opinions regarding the Operation. Techniques for collecting public and media opinions may include, but are not limited to:

- Public opinion polling;
- Surveys; and
- Media coverage analyses.

These polls, surveys and media analyses are conducted by an independent third-party. Questions may be specific to the Operation and Denison Mining, or more generally about the uranium mining industry overall. Survey responses and results of any media analyses will provide insight into public and media perceptions of Denison Mines and the Operation and the broader context.

## 2.5 Resources

Denison is committed to providing the necessary resources to support effective development, implementation, maintenance, and continual improvement of the Program, including achievement of its objectives and targets.

### 2.5.1 Roles and Responsibilities

In accordance with Denison's Corporate Disclosure Policy, Denison's Chief Executive Officer (CEO) is the designated main contact responsible for the Program and for the Public Disclosure Protocol. The CEO may designate certain personnel (i.e., Denison employees or employees of a management services company providing those services to Denison) to assist with public and media relations and communications. Information provided by other personnel shall be limited to previously disseminated, publicly available information expressly authorized by the CEO. If questions or concerns cannot be addressed in this manner by such personnel, the inquiry shall be referred to the CEO. Denison's CEO is Mr. David Cates ([dcates@denisonmines.com](mailto:dcates@denisonmines.com)).

For effective implementation of this Program, workers are informed of their roles and responsibilities and are accountable for comprehending and performing them. Additional roles and responsibilities within the Program including the Corporate Social Responsibility Director and Coordinator are outlined below:

#### Corporate Social Responsibility Director

- Oversee the development, implementation, and adherence of this Program;
- Responsible for compliance with information disclosure and engagement requirements arising from legislation, regulations, licenses, permits and other legal requirements;
- Confirming appropriate resources are made available for competence, training, and awareness of information disclosure and engagement requirements; and
- Facilitating review of the Program and maintaining its continual improvement.

### Corporate Social Responsibility Coordinator

- Leading the development, implementation, and adherence of this Program and its protocols and procedures;
- Leading the implementation of the communication strategy, tools, and methods as described within this Program;
- Maintaining information disclosure and engagement documentation and records in a secure and controlled manner;
- Providing relevant subject matter expertise and support to Denison workers; and
- Reports on Program performance as part of the management review process.

### **2.5.2 Legal and Other**

Denison is committed to complying with all applicable legal and other requirements related to public information and disclosure. Types of legal requirements applicable to the Wheeler River Operation include:

- Federal and provincial acts and regulations;
- Environmental assessment commitments and follow-up monitoring; and
- Licensing obligations and commitments.

The process for managing legal and other requirements is outlined in the *Management System Program*. Denison has established procedures to ensure compliance with these requirements and that compliance obligations are regularly reviewed. Any changes relevant to public information and disclosure obligations are monitored and evaluated to determine if updates to the *Public and Indigenous Information Program* and its supporting documentation are required.

## **2.6 Training and Competence**

Training under the Program will follow a systematic approach to training (SAT) and will align with the processes outlined in the *Management System Program*. Any persons working as part of the Program must be adequately trained to ensure that all communication associated with the project is genuine, accurate, informative, and appropriately representative of the Operation and Denison.

Program-specific training requirements are defined in the *Training and Performance Management Program*. Records of training activities and competencies will be maintained.

## **2.7 Documentation and Records Management**

All documents and records produced for or as a result of the *Public and Indigenous Information Program* are controlled to maintain information accuracy, document integrity, and document access. Documents include this Program and the Public Disclosure Protocol, the "Disclosure Policy".

Records may include, but are not limited to:

- Communication materials produced for public release and distribution;
- Meeting minutes;

- Feedback (concerns, grievances, etc.) and responses received through public discussions, email, phone call, or other means;
- Records of media sources and public opinion pieces;
- Records of Program performance (audits, management reviews, etc.); and
- Records associated with corrective actions (both planned and taken) to address nonconformities.

Documents and records will be stored and managed using existing database software already in-use by Denison. The process for managing documents and records is described in the *Management System Program*.

## 3 Do

### 3.1 Communication Strategy, Tools, and Methods

#### 3.1.1 Communication Strategy

Denison is committed to providing timely, accurate and relevant information to the target audiences identified in this Program. Denison will use multiple communications vehicles to enhance public understanding of the information and will ensure information is presented in a manner that is understandable to the public, preferably using plain, non-technical language and visual representations.

The *Public and Indigenous Information Program* has been designed to facilitate open communication about the Operation between Denison and a diverse range of target audiences. This Program exists to provide an opportunity for Interested Parties to obtain accurate information regarding operational, environmental and safety information about the Operation and its related activities. Regulatory decisions and major activities and milestones will be communicated through Denison's website, as required.

The tools and frequency for sharing and receiving information with target audiences are purposefully broad and flexible; this ensures that lines of communication may be customized and altered over time to best address each groups' preferences and needs as the Operation progresses. Communications will utilize a mix of modern (e.g., electronic communications), traditional (e.g., telephone, printed materials, radio) and in-person methods to ensure information is being effectively distributed and to eliminate technological barriers to information.

Denison will consistently review and analyze the effectiveness of this Program so that target audiences are well informed. In response to these reviews, methods and frequencies of engagement or delivery of information or updated/new products will be developed to address emerging needs among the stakeholders.

#### 3.1.2 Communication Tools and Methods

Denison uses various communication tools and methods to share information with target audiences. Communication tools and methods that may be used to disseminate information about the Operation may include, but are not limited to:

- **In-Person Meetings and Engagement**
  - Hosting information sessions, such as workshops and multi-media presentations (e.g., slideshows, videos, etc.);
  - Community visits such as open houses or participating in community-led events;
  - Hosting site visits for Interested Parties; and
  - Hosting other meetings (in-person and/or virtual) to facilitate information about the Operation.
- **Traditional Communication Tools and Methods**
  - Making printed materials (e.g., posters, newsletters, fact sheets, handouts) available to the public;

- Advertisements in newspapers and posters displayed in public locations such as the main stores and community centres;
- Utilizing radio to disseminate Operation information and/or Operation-related advertising;
- Providing mailed survey questionnaire(s) to local residents and interested parties; and
- Maintaining a toll-free phone number for Operation queries and concerns.
- **Modern/Technological Communication Tools and Methods**
  - Updating and posting new information on the Denison website;
  - Monitoring and responding to queries and concerns sent to the Operation email address;
  - Providing online survey questionnaire(s) to local residents and interested parties; and
  - Supporting and updating other forms of online media, such as social media.

In all communication tools and methods, Denison commits to providing information in clear, plain language and, where appropriate, providing information in languages other than English (e.g., French, Indigenous languages such as Dene and Cree). Pertinent Denison personnel to the *Public and Indigenous Information Program* and the Operation are provided in this document in section 2.5.1. Furthermore, contact information of persons responsible for the Program are updated and distributed via multiple communication methods (e.g., in-person, telephone, email) and are available upon request from Interested Parties or other members of the general public and media.

The following sections (section 3.1.2.1 to section 3.1.2.8) provide additional information and details of select communication tools and methods likely to be used by Denison as part of the Program. As noted, this is not an exhaustive list of communication tools or methods.

### **3.1.2.1 Community Visits**

Denison may provide information to members of the public through periodic visits to communities, which may take the form of open house forums, participating in community-led events, etc. Denison representatives use these opportunities to share information about Denison-related projects and activities. When specific projects or operations matters are being discussed, Denison ensures personnel who are knowledgeable on the Operation are on-hand to respond to questions. These personnel work hard to engage in one-on-one dialogue with interested individuals. Denison may also use supplementary tools during these sessions, such as poster-boards, fact sheets, hand-outs, etc. to support the information sharing process. When relevant and appropriate, Denison strives to provide Dene and Cree interpretation services during meetings and to advertise for upcoming Denison events. Denison accomplishes this through the use of advertisements in newspapers, posters displayed in public locations such as the main stores and community centres, and radio announcements made in English, Dene and Cree.

### **3.1.2.2 Denison ESG Reports**

Denison produces an annual Environmental, Social and Governance (ESG) Report which provides an overview of Denison and its previous year's projects and activities. The ESG Report provides easily understandable information on Denison's safety and environmental performance, as well as Denison's

community involvement and human resources practices. The ESG Report is available on the Denison website.

### **3.1.2.3 Other Publications as Vehicles for Dissemination of Information**

When considered to be timely and appropriate, Denison uses other publications as vehicles for the delivery or dissemination of information to northern Saskatchewan communities, where Denison will prepare the information for inclusion in existing publications, such as newspapers or magazines. Using this method allows Denison to broadly communicate with all target audiences in northern Saskatchewan through a means that is already being utilized. Such information may include company and operations, socio-economic statistics, initiatives being undertaken by Denison, etc.

### **3.1.2.4 Website**

Denison maintains a website ([www.denisonmines.com](http://www.denisonmines.com)) that focuses on the company's exploration, mining, and milling activities in Canada. This site is kept up to date on a regular basis and provides easy access to various communications documents, such as newsletters, press releases, important incident reports, project, or operation specific reports (i.e., ESG Reports). Website visitors and page views are tracked to help Denison understand the types of information most sought after by those accessing the website. Denison also occasionally hosts project-specific websites on an as-needed basis, such as the [www.wheelerriverproject.ca](http://www.wheelerriverproject.ca) for periods of time when a stand-alone website makes sense.

### **3.1.2.5 Social Media**

Social media is an effective communication tool for target audiences. The social media platforms used by Denison, which include a Facebook page, LinkedIn account and Twitter feed, provide opportunities for users to post comments and ask questions. Comments and questions received via any of these social media platforms are responded to either directly on that platform or via private email when more appropriate to do so. Denison's social media reach is monitored regularly by reviewing each platform's account analytics. This quantitative data is used to assess the reach of the information published and improve the content and/or communications methods used for certain types of information. This data is also used to help decide which tools to carry forward, improve or cancel. Social media metrics, including numbers of posts, may be included in reporting to regulators.

### **3.1.2.6 Advertising**

Denison pursues advertising opportunities to provide information about topics of interest and public engagement opportunities such as public meetings. This includes the use of radio, local newspapers, newsletters, and magazines and/or community bulletin boards.

### **3.1.2.7 Media**

Denison notifies local media of news related to the company's operations as appropriate. In most cases, this takes the form of a press release. These press releases are available on the Denison website. Denison communications representatives are available to respond to inquiries from journalists. In Addition, Denison regularly reviews and analyzes the media coverage it receives in relevant communities. Denison keeps track of significant news items focusing on its activities in northern Saskatchewan. Media coverage is not an indicator of public opinion.



### 3.1.3 Communication Frequency

Denison will base its communication frequency on the type of information needed to be communicated.

Information about the Operation will be shared as key updates to the Operation become realized. Communications could include information about the Operation schedule (e.g., the completion of important milestones, or the initiation of new phases). Information regarding regulatory decisions will be made available as soon as reasonably possible. Furthermore, there may be non-routine communications shared on a case-by-case basis, as set out in Denison's Public Disclosure Protocol (**Appendix A**). These non-routine communications of significant public concern will be reported in adherence with the timing commitment described in the Public Disclosure Protocol. Responses to requests for information or Operation concerns will be answered promptly, with the timing of responses related to the quantity of requests received at any one time.

Delivery of information may be provided through mail (e.g., letters, pamphlets), email, in-person or virtual meetings and workshops, or posted online via the company website and/or social media channels.

### 3.1.4 Non-Routine Communication

Denison will continue to optimize communication procedures with target audiences, where appropriate and it makes sense to do so.

Information related to public health and safety, security, and environmental incidents, including incidents reportable under Section 29 of the *General Nuclear Safety and Control Regulations* and incidents of public concern are communicated through the Denison website within 1-2 business days of the appropriate regulatory agencies being notified, as per the Public Disclosure Protocol.

The process for reporting incidents is described in the *Management System Program*.

Additional non-routine communications shared through the Denison website may include information regarding:

- Impacts from dangerous weather or natural disasters, such as earthquakes, fires, or floods;
- Substantial operational developments, including labour disputes or proposed expansions to facility design or operation;
- Non-routine releases of radiological and/or hazardous materials to the environment;
- Planned or unplanned disruptions of facility operations;
- Results of environmental monitoring programs; and
- Any other events that may have effects beyond the Project-area that could be of public interest or attract attention from media.

### 3.2 Public Disclosure Protocol

Denison has a Public Disclosure Protocol compliant with CNSC's REGDOC-3.2.1: *Public Information and Disclosure* (2018). A copy of the Public Disclosure Protocol is provided in **Appendix A** and will be made available on Denison's website ([www.denisonmines.com](http://www.denisonmines.com)) following licensing approval.

Denison's Code of Ethics requires that all public communications made by Denison is full, fair, accurate, timely and understandable. Denison's Corporate Disclosure Policy further describes our commitment to ensuring informative, timely and accurate disclosure of material information concerning Denison to the public. Denison is committed to providing fair and equal access to such information through broadly disseminated disclosure.

In keeping with our commitments, this Program specifically considers the disclosure of information to, and the exchange of information with, Indigenous groups and members of the public who are interested in our operations. Through open dialogue Denison works to identify the information that our Interested Parties value. The methods of communication vary based on the effectiveness and purpose of such communications, and may be oral, written, or social media based.

The Public Disclosure Protocol will be distributed to members of the public for regular review. If changes to the Protocol are deemed necessary, the updated revisions will be provided to the CNSC indicating the reasons for the changes.

## 4 Check

### 4.1 Monitoring and Measurement

Program performance is monitored and measured against established objectives and targets (identified in section 2.2). Program monitoring includes an assessment of public and media opinion related to the Operation and overall Program performance. Denison will evaluate the performance of the *Public and Indigenous Information Program* and Public Disclosure Protocol in meeting the stated objectives using the defined process outlined in the *Management System Program*.

Results of monitoring and measurement activities are documented as outlined in the Records Management process outlined in the *Management System Program*.

### 4.2 Monitor Public and Media Opinion

To gauge public understanding of, and support for, uranium mining and milling in Saskatchewan, Denison plans to monitor and evaluate public and media opinion periodically. Public and media opinions and concerns regarding the Operation and related activities will be obtained using several methods.

Monitoring of public opinion may be done through surveys or polling performed through an independent third party. The survey may include questions related to Denison's environmental and safety track record, and questions about areas of most interest to the public when it thinks of uranium mining.

Direct consultation with various Interested Parties in the form of in-person assemblies or workshops may be used to directly discuss Denison projects and activities with members of the public. Denison will analyze information collected during these consultation sessions to further evaluate public opinions on Denison, the Operation, and the uranium mining and milling industry as a whole.

Monitoring of media opinion may be done through third-party analysis including a summary of all related news, social media posts, etc.

The outcome of the public and media opinion surveys and analyses is used to review, improve and/or develop communications plans and tools aimed at more adequately addressing areas of concerns by the general population. The survey results are also used to inform government representatives, elected officials and community leaders of the general trends in relation to the uranium mining industry.

Results of the public and media opinion monitoring are assessed and summarized in the annual Program review report. Trends in public and media opinion are interpreted and used to determine Program efficiency and/or to inform improvements for future iterations of the Program. A complete summary of public and media opinion monitoring activities is reported to the CNSC as part of annual reporting for ongoing compliance verification purposes as required in REGDOC-3.1.2.

### 4.3 Inspections and Audits

Denison will conduct internal audits of the *Public and Indigenous Information Program* to determine if Denison is complying with the requirements set out in the Program and to determine if the Program is being effectively implemented and maintained.

The internal audits will follow the process and procedures outlined in the *Management System Program*. Audits are directed by qualified personnel independent of the Program.

## 4.4 Management Review

This *Public and Indigenous Information Program* are subject to annual review and evaluation by Denison management to determine if the defined Program is meeting its objectives, is effective or needs adjustments.

Topics relevant to Indigenous and public engagement will be reviewed and may include, but are not limited to:

- Suitability, adequacy, and performance of Program objectives and targets;
- Requests for information from Interested Parties, general queries, and Operation feedback received;
- Public and media opinions and reporting;
- Upcoming or new legislation related to engagement;
- Results of audits in relation to Program performance objectives and targets; and
- The status of corrective actions for instances of non-compliance and/or actions to improve Program efficacy;
- Adequacy of Program resources; and
- Needs for Program adjustment.

Denison management will identify opportunities for improvement and establish action plans to implement change in accordance with the process outlined in the *Management System Program*.

## 4.5 Reporting

Reporting, disclosure, and communication to Indigenous groups, and members of the public is conducted as described in section 3.1 'Communication Strategy, Tools, and Methods' in accordance with applicable regulatory requirements.

## 5 Act

### 5.1 Corrective Action

Non-conformities or areas for improvement are identified following the process outlined in the *Management System Program* and the supporting procedures. Non-conformities can include deviations from the *Public and Indigenous Information Program* or identified during inspections and audits.

Responses to identification of non-conformities include investigation of cause, and corrective action if appropriate. Corrective actions are planned, implemented, verified, and reviewed for effectiveness based on the process identified in the *Management System Program*.

### 5.2 Continual Improvement

Opportunities for improvement of the *Public and Indigenous Information Program* will be identified and addressed to improve the applicability, capability and overall effectiveness of the Program. The continual improvement process for this Program follows the overall continual improvement process outlined in the *Management System* and the supporting procedures. Continual improvement may also include updating Program objectives and targets based on changing circumstances landscape or social context within which the Operation exists. Any changes identified through the continual improvement process will be implemented in a systematic and controlled manner.

Opportunities for continual improvement may include but are not limited to any of the following external sources of information:

- Program monitoring;
- Denison staff experiences;
- Regulatory, industry and professional association publications and information exchanges;
- Lessons learned;
- Feedback from target audiences; and
- Incident reports and investigations.

## 6 References

### 6.1 Internal

| Document Name                               |
|---|
| Management System Program                   |
| Training and Performance Management Program |
|   |
|   |
|   |

### 6.2 External

Canadian Nuclear Safety Commission (CNSC). 2022. *Reporting Requirements, Volume I: Non-Power Reactor Class I Nuclear Facilities and Uranium Mines and Mills*. Regulatory document REGDOC-3.1.2, Version 1.1.

Canadian Nuclear Safety Commission (CNSC). 2018. *Public Information and Disclosure*. Regulatory document REGDOC-3.2.1.

Canadian Nuclear Safety Commission (CNSC). 2022. *Indigenous Engagement*. Regulatory document REGDOC-3.2.2, Version 1.2.

Denison Mines (Denison). 2022. Wheeler River Project – Draft Environmental Impact Statement. October.

*Nuclear Safety and Control Act*. S.C. 1997, c. 9. Last amended 1 January 2017. Available at <https://laws-lois.justice.gc.ca/eng/acts/n-28.3/>

*Uranium Mines and Mills Regulations*. SOR/2000-206 under the Nuclear Safety and Control Act. Last amended 22 September 2017. Available at <https://laws-lois.justice.gc.ca/eng/regulations/sor-2000-206/index.html>

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## Appendix A Denison Mines Corp. Public Disclosure Protocol

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Denison Mines Corp. is committed to conducting our operations in a socially responsible, environmentally sustainable, and profitable manner. Denison's Code of Ethics requires that all public communications made by Denison is full, fair, accurate, timely and understandable. Denison's Corporate Disclosure Policy further describes our commitment to ensuring informative, timely and accurate disclosure of material information concerning Denison to the public. Denison is committed to providing fair and equal access to such information through broadly disseminated disclosure.

In keeping with our commitments, Denison's *Public and Indigenous Information Program* (Program) specifically considers the disclosure of information to, and the exchange of information with, Indigenous groups and members of the public who are interested in our operations.

Through open dialogue Denison works to identify the information that our Interested Parties value. The methods of communication vary based on the effectiveness and purpose of such communications, and may be oral, written, or social media based.

This Public Disclosure Protocol expresses Denison's commitments pursuant to the Program to:

- Engage in open dialogue to identify the information that our Interested Parties value.
- Assess various appropriate methods of communication, including oral (in person or by media), written, or social media based, to ensure effectiveness of communication and engagement, informed by the purpose and intended audience for such communication.
- Maintain two-way communication channels with Indigenous communities and the general public as a means to identify and respond to issues and concerns.
- Post to its website timely information regarding material operational matters, including:
  - Significant operational changes, such as a production start, increase, expansion, suspension, or termination.
  - Information related to a work-related fatality, catastrophic event, or environmental event that triggers a Section 29 notification pursuant to the *General Nuclear Safety and Control Regulations*, or that may result in significant public concern.
  - Summaries of discharge of contaminants of potential concern against licence limits for treated water released to the environment as part of normal operations.
- Engage periodically with Indigenous communities and the general public to ensure that communications are timely, informative, and amend this Public Disclosure Protocol as necessary to address Interested Parties' requests.
- Post a copy of this Public Disclosure Protocol on our website ([www.denisonmines.com](http://www.denisonmines.com)).