



This is the 2<sup>nd</sup> affidavit  
of Y. Yang in this proceeding  
and was made on 21<sup>st</sup> /JAN/2025

No. S-224444  
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT,  
R.S.C. 1985, c. C-36, AS AMENDED

AND

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF CANADIAN  
DEHUA INTERNATIONAL MINES GROUP INC., WAPITI COKING COAL MINES CORP. AND  
CANADIAN BULLMOOSE MINES CO., LTD.

PETITIONERS

AFFIDAVIT

I, YANG YANG, senior investment manager, of 22 Floor, Shougang International Building, North Street No. 60, Xizhimen, Haidian District, Beijing, People's Republic of China, AFFIRM THAT:

1. I am the senior investment manager of China Shougang International Trade & Engineering Corporation ("Shougang"), a creditor in this proceeding (the "CCAA Proceeding"), and as such I have personal knowledge of the facts and matters deposed to herein, except where stated to be based upon information and belief, and where so stated I verily believe the same to be true.
2. I am also a director of Shougang International (Canada) Investment Ltd. ("Shougang Canada"), which is the sole Canadian subsidiary of Shougang, and as such I also have personal knowledge of the facts and matters deposed to herein with respect to Shougang Canada, except where stated to be based upon information and belief, and where so stated I verily believe the same to be true.
3. Shougang is also the applicant in the application for bankruptcy order with respect to Canadian Dehua International Mines Group Inc. ("CDI"), filed in the Supreme Court of British Columbia, Vancouver Registry, Court Number B-220142, Estate Number 11-254383 (the "Bankruptcy Application").
4. I am approved by Shougang and Shougang Canada to make this affidavit on their behalf.

2025.1.21

5. This affidavit is further to my first affidavit made March 30, 2022, and filed in support of the Bankruptcy Application, and my first affidavit made June 8, 2022 (the "First CCAA Affidavit") in the CCAA Proceeding.

### Shougang

6. As stated in the First CCAA Affidavit:

- (a) Shougang is a limited liability company incorporated in Beijing, People's Republic of China, having an address for service in this proceeding care of its solicitors, Dentons Canada LLP, 20<sup>th</sup> Floor, 250 Howe Street, Vancouver, British Columbia, V6C 3R8.
- (b) Shougang is a subsidiary of Shougang Group. Shougang Group is wholly-owned by the Beijing State-owned Assets Supervision and Administration Commission (the "Beijing Commission").
- (c) To the best of my information and belief, Canada Zhonghe Investment Ltd. ("Zhonghe"), also a creditor of CDI, is indirectly State-owned. However, to the best of my information and belief, Zhonghe is a subsidiary of the Kailuan Group, which is under the Hebei Commission (Hebei is a different Province in People's Republic of China). Zhonghe is not owned or controlled by the Beijing Commission.

7. Shougang owns 100% of the shares of Shougang Canada.

8. Shougang Canada is a company incorporated under the laws of British Columbia. Now shown to me and attached hereto as Exhibit "A" is a copy of a BC Company search of Shougang Canada dated January 16, 2025.

9. Shougang Canada was incorporated on August 23, 2010.

10. Shougang does not have any other Canadian subsidiaries or affiliates.

### Funding Source for Offers

11. I have reviewed the first affidavit of Ronald Willson ("Chief Willson") filed on January 7, 2025 (the "First Willson Affidavit") in the CCAA Proceeding. At paragraph 22, Chief Willson deposes that West Moberly First Nations' source of funds for its offers in the CCAA Proceeding is a "wholly Canadian source under an agreement which requires West Moberly to maintain confidentiality".

12. I have also reviewed the application response of Qu Bo Liu ("Ms. Liu") filed on January 9, 2025 (the "Liu Response") in the CCAA Proceeding. At paragraph 16 in the Liu Response,

Ms. Liu speculates that the funding source referenced by Chief Willson in the First Willson Affidavit could be Zhonghe or Shougang.

13. I have also reviewed the second affidavit of Chief Willson filed on January 10, 2025 (the "Second Willson Affidavit") in the CCAA Proceeding. At paragraph 5, in response to the speculation in the Liu Response, Chief Willson further deposes that "the source of funds for the West Moberly First Nations bids is not connected to any of those entities", which is referring to the entities from the list of proofs of claim set out in the Seventh Report of the Monitor dated September 7, 2023 (the "Seventh Report"). The list in the Seventh Report includes Shougang.

14. In addition to the evidence of Chief Willson, I further confirm that:

- (a) neither Shougang nor Shougang Canada has provided, or agreed to provide, any funding to any party, including West Moberly First Nations or Ms. Liu, with respect to any offer made in this CCAA Proceeding, including the offers currently being considered with respect to the Wapiti and Bullmoose assets; and
- (b) neither Shougang nor Shougang Canada has directed any related or affiliated company or entity formed outside of Canada to contribute any funding to any party, including West Moberly First Nations or Ms. Liu, with respect to any offer made in this CCAA Proceeding, including the offers currently being considered with respect to the Wapiti and Bullmoose assets.

AFFIRMED BEFORE ME at Haidian, Beijing,  
People's Republic of China, on  
21<sup>st</sup> /JAN/2025.

\*/1/2 PRC License No. 11101200910285872

A Commissioner for taking Affidavits within  
Haidian, Beijing, People's Republic of China  
Name:



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YANG YANG

Address: Room 1002, Floor 10  
Building 1, Zao Yuan Street No. 16  
Taxing, Beijing, PRC  
Telephone: +86 -10 - 6029 2582

2025.1.21

This is **Exhibit "A"** referred to in the affidavit of Yang Yang affirmed before me at Haidian, Beijing, People's Republic of China this 21<sup>st</sup> day of January, 2025

牛浩 PRC License No. 11101200910285872  
A Commissioner for taking Affidavits  
For Haidian, Beijing, People's Republic of China

2025.1.21



## BC Company Summary

### For SHOUGANG INTERNATIONAL (CANADA) INVESTMENT LTD.

Date and Time of Search: January 16, 2025 02:08 PM Pacific Time  
Currency Date: August 20, 2024

#### ACTIVE

Incorporation Number: BC0888669  
Name of Company: SHOUGANG INTERNATIONAL (CANADA) INVESTMENT LTD.  
Business Number: 850368804 BC0001  
Recognition Date and Time: Incorporated on August 23, 2010 10:42 AM Pacific Time In Liquidation: No  
Last Annual Report Filed: August 23, 2024 Receiver: No

#### REGISTERED OFFICE INFORMATION

Mailing Address:  
SUITE 202 - 2232 WEST 41ST AVENUE  
VANCOUVER BC V6M 1Z8  
CANADA

Delivery Address:  
SUITE 202 - 2232 WEST 41ST AVENUE  
VANCOUVER BC V6M 1Z8  
CANADA

#### RECORDS OFFICE INFORMATION

Mailing Address:  
SUITE 202 - 2232 WEST 41ST AVENUE  
VANCOUVER BC V6M 1Z8  
CANADA

Delivery Address:  
SUITE 202 - 2232 WEST 41ST AVENUE  
VANCOUVER BC V6M 1Z8  
CANADA

#### DIRECTOR INFORMATION

Last Name, First Name, Middle Name:  
YANG, YANG

Mailing Address:  
ROOM 201, BUILDING NO. 18  
PINGGUOYUAN DISTRICT 1, SHIJINGSHAN DIST  
BEIJING 100041  
CHINA

Delivery Address:  
ROOM 201, BUILDING NO. 18  
PINGGUOYUAN DISTRICT 1, SHIJINGSHAN DIST  
BEIJING 100041  
CHINA

2025.1.21

**Last Name, First Name, Middle Name:**

ZHANG, LIANG

**Mailing Address:**

UNIT 906, BUILDING 20, BEI LI JIA  
CHEGONGZHUANG STREET, XICHENG DISTRICT  
BEIJING  
CHINA

**Delivery Address:**

UNIT 906, BUILDING 20, BEI LI JIA  
CHEGONGZHUANG STREET, XICHENG DISTRICT  
BEIJING  
CHINA

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**Last Name, First Name, Middle Name:**

ZHANG, ZHONGCAI

**Mailing Address:**

301 - 3 NO.1 BUILDING, AREA 5  
TIANTONGYUAN, CHANGPING DISTRICT BEIJING  
CHINA

**Delivery Address:**

301 - 3 NO.1 BUILDING, AREA 5  
TIANTONGYUAN, CHANGPING DISTRICT BEIJING  
CHINA

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**OFFICER INFORMATION AS AT August 23, 2024**

**Last Name, First Name, Middle Name:**

ZHANG, LIANG

**Office(s) Held:** (President)

**Mailing Address:**

UNIT 906, BUILDING 20, BEI LI JIA  
CHEGONGZHUANG STREET  
XICHENG DISTRICT BEIJING  
CHINA

**Delivery Address:**

UNIT 906, BUILDING 20, BEI LI JIA  
CHEGONGZHUANG STREET  
XICHENG DISTRICT BEIJING  
CHINA

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