FORCE FILED

No. S-226670
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 THE *BUSINESS CORPORATIONS ACT*, S.B.C. 2002, c. 57, AS AMENDED AND THE *BUSINESS CORPORATIONS ACT*, S.N.B. 1981, c. B-9.1, AS AMENDED

AND

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF TREVALI MINING CORPORATION AND TREVALI MINING (NEW BRUNSWICK) LTD.

PETITIONERS

NOTICE OF APPLICATION

Name of applicant: FTI Consulting Canada Inc., in its capacity as court-appointed monitor of Trevali Mining Corporation and Trevali Mining (New Brunswick) Ltd. (in that capacity, the "**Monitor**" or the "**Applicant**")

To: The Service Lists attached hereto as **Schedule "A"**.

TAKE NOTICE that an application will be made by the Applicant to the Honourable Madam Justice Fitzpatrick at the courthouse at 800 Smithe Street, Vancouver, British Columbia, on September 29, 2026 at 10:00 a.m., for the orders set out in Part 1 below.

The Applicant estimates that the application will take two hours.

☐ This matter is within the jurisdiction of an associate judge.

☒ This matter is not within the jurisdiction of an associate judge.

Part 1: ORDERS SOUGHT

1. An order, as necessary, abridging the time for service of this Notice of Application and the Twenty-Fifth Report of the Monitor dated September 18, 2026 (the "**Twenty-Fifth Report**").

2. An order substantially in the form attached hereto as **<u>Schedule "B"</u>** (the "**Second Interim Distribution Order**"), that, among other things:

   (a) extends the Stay Period, as defined in paragraph 15 of the Amended and Restated Initial Order of this Court pronounced on August 29, 2022 (the "**ARIO**") in respect of Trevali Mining Corporation ("**Trevali Corp.**") from September 30, 2026, until and including March 31, 2027 (the "**Stay Extension**"); and

   (b) approves and authorizes the Monitor to make the Second Interim Distribution (as defined below).

3. An order substantially in the form attached hereto as **<u>Schedule "C"</u>** (the "**Appian Settlement Approval Order**"), that, among other things, approves the Settlement Agreement dated September 9, 2026 (the "**Settlement Agreement**") among Appian Natural Resources Fund III LP, Appian Natural Resources (UST) Fund III LP, ANR RP Limited and Rosh Pinah Zinc Corporation (Pty) Ltd. (collectively, the "**Appian Plaintiffs**"), Trevali Mining Corporation ("**Trevali Corp.**"), and the Monitor;

4. An order substantially in the form attached hereto as **<u>Schedule "D"</u>** (the "**Post-Filling Claims Process Order**"), that, among other things, approves a claims process (the "**Post-Filling Claims Process**") with respect to claims that may be made against the directors or officers of Trevali Corp. or Trevali Mining (New Brunswick) Ltd. ("**Trevali NB**") since the Filing Date (as defined below); and

5. Such further orders as counsel for the Applicant may advise and this Court may deem appropriate in the circumstances.

Part 2: FACTUAL BASIS

6. The Monitor currently has expanded powers with respect to Trevali Corp. pursuant to an order of this Court granted June 28, 2023 (the "**EMP Order**").

7. The Monitor seeks the Stay Extension to permit the Monitor to continue progressing various matters in this proceeding, including without limitation, outstanding claims under the claims process, administration of the Second Interim Distribution (if approved), and the administration of Trevali Corp.'s estate generally.

8. The Monitor seeks the Second Interim Distribution Order in order to make a further interim distribution to unsecure creditors of Trevali Corp.

9. The Monitor seeks the Appian Settlement Approval Order to approve the Settlement Agreement in order to settle the ongoing indemnity claims between the Appian Plaintiffs

and Trevali Corp. and realize proceeds held pursuant to the Indemnity Escrow Agreement (as defined below) for the benefit of Trevali Corp.'s stakeholders.

10. The Monitor seeks the Post-Filing Claims Process Order to determine if there any Post-Filing Claims (as defined below) against the directors and officers of Trevali Corp. or Trevali NB that are subject to indemnification pursuant to paragraph 22 of the ARIO and secured by the D&O Charge, as defined in paragraph 23 of the ARIO.

Summary of the CCAA Proceedings

11. On August 19, 2022 (the "**Filing Date**"), this Court granted an Initial Order (the "**Initial Order**") commencing proceedings (the "**CCAA Proceedings**") pursuant to the *CCAA*. The Initial Order granted, among other things, a stay of proceedings (the "**Stay of Proceedings**") in favour of Trevali Corp. and Trevali NB (collectively "**Trevali**" or the "**Petitioners**") until the initial return date of August 29, 2022.

12. Capitalized terms not otherwise defined herein are defined in the Twenty-Fifth Report.

13. On August 29, 2022, this Court granted the ARIO, which extended the Stay of Proceedings until October 6, 2022, among other matters. The Stay of Proceedings in respect of Trevali Corp. has been further extended from time to time and currently expires on September 30, 2026.

14. Since being granted protection under the *CCAA*, both Trevali Corp. and Trevali NB have worked to restructure their affairs for the benefit of their stakeholders and to maximize recovery for creditors.

15. On September 14, 2022, this Court approved a Sales and Investment Solicitation Process (the "**SISP**") to solicit offers for, among other things, the purchase of Trevali Corp.'s interest in the Rosh Pinah mine in Namibia.

16. The SISP resulted in a sale (the "**Appian Transaction**") of Trevali Corp.'s 90% interest in the Rosh Pinah mine, Trevali Corp.'s primary asset of value, by way of a sale of the shares of GLCR Limited, to Appian Natural Resources Fund III LP and Appian Natural Resources (UST) Fund III LP (collectively, "**Appian**") pursuant to the Appian SAPA, as subsequently assigned pursuant to an assignment agreement dated June 2, 2023, to ANR RP Limited, an Appian affiliate, as authorized in the Appian SAPA.

17. On December 21, 2022, this Court approved the Appian Transaction.

18. On March 29, 2023, this Court granted an order approving a process for determining the nature and amounts of certain claims against Trevali and their directors and officers (the "**Claims Process Order**").

19. On April 24, 2023, this Court approved a distribution order (the "**Secured Creditor Distribution Order**") authorizing the distribution by Trevali Corp. of available funds including in respect of the Immediately Available Sale Proceeds (as defined in the Secured Creditor Distribution Order) arising from the Appian Transaction. The Secured Creditor Distribution Order authorized the distribution of funds as more particularly set out in that order including distribution on account of the Outstanding Interim Financing Balance, the Revolving Credit Facility and the Glencore Facility (each as defined in the Secured Creditor Distribution Order), subject to certain required holdbacks, as further defined and described in the Secured Creditor Distribution Order.

20. On June 23, 2023, the Appian Transaction closed. On closing of the Appian Transaction, funds were distributed on account of the Outstanding Interim Financing Balance, the Revolving Credit Facility and the Glencore Facility as authorized in the Secured Creditor Distribution Order. The Outstanding Interim Financing Balance, the Revolving Credit Facility and the Glencore Facility have been repaid in full.

21. While there are certain remaining recoveries that are expected to further maximize value for Trevali Corp.'s stakeholders, as discussed below, the vast majority of Trevali Corp.'s valuable assets have been sold or otherwise liquidated/restructured as part of the CCAA Proceedings or other court processes.

22. With respect to Trevali Corp.'s other two principal mining assets, namely the Caribou mine in New Brunswick and the Perkoa mine in Burkina Faso, since Trevali filed for *CCAA* protection:

    (a) on November 14, 2022, a liquidation process was commenced for Nantou Mining Burkina Faso S.A. ("**Nantou Mining**"), Trevali's 90% indirectly owned subsidiary that operates the Perkoa mine. The liquidator in Burkina Faso has assumed responsibility for the operations of Nantou Mining; and

    (b) on January 9, 2023, FTI Consulting Canada Inc. was appointed as the receiver (in such capacity, the "**Receiver**") of all the assets, undertakings and property of Trevali NB, including all proceeds thereof, other than any real property, mineral claims, mining leases or real property leases owned or held by Trevali NB, effective from January 24, 2023 at 11:59 pm. Since its appointment, the Receiver has been working to maximize value for those Trevali NB assets.

23. Trevali's remaining employees ceased their employment with Trevali on or prior to June 30, 2023. In addition, Trevali's one remaining director also resigned prior to June 30, which was also when Trevali's directors' and officers' insurance expired.

24. Given the status of Trevali Corp.'s restructuring efforts, the nature of its remaining assets, and the reduction of its employees and management, Trevali Corp. brought an application to expand the Monitor's powers regarding Trevali Corp.

25. On June 28, 2023, this Court granted the EMP Order that expanded the powers of the Monitor with respect to Trevali Corp. and its property.

Stay Extension

26. Since August 29, 2022, when this Court granted the ARIO and extended the Stay of Proceedings until October 6, 2022, the Stay of Proceedings in respect of Trevali Corp. has been further extended as follows:

(a) until December 15, 2022, by the Order of this Court pronounced October 11, 2022;

(b) until January 27, 2023, by the Order of this Court pronounced December 14, 2022;

(c) until April 30, 2023, by the Order of this Court pronounced January 27, 2023;

(d) until June 2, 2023, by the Order of this Court pronounced April 24, 2023;

(e) until July 14, 2023, by the Order of this Court pronounced June 2, 2023;

(f) until October 27, 2023, by the Order of this Court pronounced June 28, 2023;

(g) until April 26, 2024, by the Order of this Court pronounced October 25, 2023;

(h) until October 31, 2024, by the Order of this Court pronounced April 26, 2024;

(i) until March 31, 2025, by the Order of this Court pronounced October 28, 2024;

(j) until September 30, 2025, by the Order of this Court pronounced March 31, 2025;

(k) until March 31, 2026, by the Order of this Court pronounced September 26, 2025; and

(l) until September 30, 2026, by the Order of this Court pronounced March 24, 2025;

27. Since the last stay extension order, the Monitor has, among other things:

(a) continued to work with former management to assist with ongoing matters on a contract basis;

(b) continued to review and assess all unresolved claims with the objective of bringing the claims process under the Claims Process Order to a conclusion;

(c) executed an asset purchase agreement with Bathurst Metallic Corp. with respect to the sale of substantially all of the assets of Trevali Mining (Maritimes) Ltd., a wholly-owned subsidiary of Trevali Corp.;

(d) with the assistance of its counsel, responded to the application by Glencore Canada Corporation for leave to appeal to the Supreme Court of Canada of the order of the Court of Appeal for British Columbia dismissing the appeal by Glencore Canada Corporation of the order of this Court granted December 13, 2024, that Glencore Canada Corporation remit to the Receiver certain amounts owing to the Canada Revenue Agency (the "**Glencore HST Appeal**");

(e) with the assistance of former management and its counsel, continued to address indemnity claims from ANR RP Limited under the Appian SAPA and the Indemnity Escrow Agreement (as defined in the Appian SAPA), including advancing litigation steps and settlement (discussed further below); and

(f) prepared the Twenty-Fifth Report.

28. The Monitor seeks the Stay Extension to allow the Monitor time to, among other things:

(a) attend to remaining post-closing matters associated with the Appian Transaction, in particular administration of the Settlement Agreement, if approved, and associated matters with respect to the Indemnity Escrow Agreement;

(b) administer the Second Interim Distribution (as defined below), if approved;

(c) resolve outstanding creditor claims under the Claims Process Order;

(d) address any matters that arises from the Glencore HST Appeal;

(e) administer the Post-Filing Claims Process under the Post-Filing Claims Process Order, if approved; and

(f) otherwise administer Trevali Corp.'s estate, including seeking further distribution orders if appropriate.

29. Trevali Corp. will have sufficient liquidity during the period of the Stay Extension.

Second Interim Distribution

30. On December 8, 2025, this Court approved the first interim distribution order (the "**First Interim Distribution Order**") authorizing an interim distribution in the total amount of CA$5,800,000 on a *pro rata* basis to Trevali Corp.'s unsecured creditors with Proven

Claims (as defined in and pursuant to the Claims Process Order) against Trevali Corp. (the "**First Interim Distribution**").

31. Subject to approval of the Settlement Agreement by this Court and subsequent payment of the Remaining Amount (as defined below) to Trevali Corp. by the Escrow Agent (as defined below) pursuant to the Settlement Agreement, the Monitor anticipated it will be holding approximately CA$10,400,000 in the Trevali Corp. estate trust accounts.

32. As a result, subject to certain holdbacks, the Monitor seeks approval of a second interim distribution of CA$8,100,000 on a *pro rata* basis to Trevali Corp.'s unsecured creditors with Proven Claims (as defined in and pursuant to the Claims Process Order) against Trevali Corp. (the "**Second Interim Distribution**").

Appian Indemnity Claims and Settlement Agreement

33. As noted above, the SISP resulted in a sale of Trevali Corp.'s 90% interest in the Rosh Pinah mine, Trevali Corp.'s primary asset of value, by way of a sale of the shares of GLCR Limited, to Appian pursuant to the Appian SAPA, as subsequently assigned pursuant to an assignment agreement dated June 2, 2023, to ANR RP Limited, an Appian affiliate, as authorized in the Appian SAPA.

34. Pursuant to the Appian SAPA, the representations, warranties, covenants and obligations contained therein survived the closing and continued in full force and effect for a period of 18 months after the closing date, being December 23, 2024 (the "**Release Date**").

35. Indemnity claims under the Appian SAPA are first satisfied pursuant to the terms of the Indemnity Escrow Agreement dated June 23, 2023 (the "**Indemnity Escrow Agreement**"). The amount held by the escrow agent pursuant to the Appian SAPA and the Indemnity Escrow Agreement is US$9 million, plus interest (the "**Escrow Amount**"), which is held by Computershare Trust Company of Canada (the "**Escrow Agent**") pursuant to the Indemnity Escrow Agreement.

36. Trevali Corp. as an "Indemnifying Party" has received two indemnity claims with respect to the Appian SAPA (collectively, the "**Indemnity Claims**"):

(a) a claim submitted by Rosh Pinah Zinc Corporation (Proprietary) Ltd. ("**RPZC**"), as a "Purchased Corporation" and "Indemnified Person", pursuant to Section 8.4(a) of the Appian SAPA, being a "Third Party Claim", with respect to an income tax audit for fiscal year 2020 by the Namibian Revenue Agency and the Appian Plaintiffs have also reserved their rights to advance further claims for indemnification under the Appian SAPA should the Namibian Revenue Agency impose further adjustments to the income tax assessments of RPZC (collectively, the "**Tax Indemnity Claims**"). The current claimed damages are alleged to be at least US$2,452,996.63; and

(b) a claim submitted by RPZC and ANR RP Limited, both as "Indemnified Persons", pursuant to Section 8.4(b) of the Appian SAPA, being a "Direct Claim", with respect to alleged breaches of the Appian SAPA related to lead contamination at and around the Rosh Pinah mine (the "**Lead Indemnity Claim**"). The claimed damages are alleged to be at least US$12,081,950.45.

37. In accordance with the terms of the Appian SAPA and the Indemnity Escrow Agreement, Trevali Corp. has disputed both the Tax Indemnity Claims and the Lead Indemnity Claim.

38. In accordance with the terms of the Appian SAPA, Trevali Corp. did not elect to assume the investigation and defense of the Tax Indemnity Claims. As such, RPZC has been responding to these claims and continues to progress that response with the Namibian Revenue Agency.

39. The Tax Indemnity Claims are awaiting a further determination by Namibian Revenue Agency with respect to RPZC's response to the audit. Although no further indemnity claim has yet been advanced by RPZC under the Tax Indemnity Claims, counsel for RPZC has advised that the Namibian Revenue Agency has expanded the scope of their audit to include the fiscal 2021 and 2022 years.

40. The Monitor and Appian have agreed to toll the period under the Appian SAPA for RPZC to commence a claim with respect to the Tax Indemnity Claims given a determination by Namibian Revenue Agency with respect to RPZC's response to the audit remains outstanding.

41. The Lead Indemnity Claim, as a "Direct Claim" under the Appian SAPA, was subject to a thirty-day period of good faith effort to resolve the dispute under the Appian SAPA. The Monitor, on behalf of Trevali Corp., and RPZC and ANR RP Limited engaged in such good faith discussions, but could not resolve the Lead Indemnity Claim.

42. Pursuant to the Appian SAPA, the Lead Indemnity Claim is to be resolved by this Court within the CCAA Proceeding.

43. On September 26, 2025, this Court ordered and directed (the "**Appian Civil Claim Order**") that, among other things:

(a) the Appian Plaintiff were permitted to file the Appian Civil Claim in respect of the Lead Indemnity Claim;

(b) on or before November 25, 2025, Trevali Corp. shall serve and file a Response to Civil Claim in respect of the Appian Civil Claim;

(c) on or before December 19, 2025, the Appian Plaintiffs may serve and file a reply in respect of the Appian Civil Claim;

(d) any and all further steps in respect of the Appian Civil Claim are stayed until the Monitor or Appian seek further directions from this Court, by way of procedural order, regarding the adjudication of the Appian Civil Claim in the CCAA Proceedings; and

(e) the Appian Civil Claim will be adjudicated in the CCAA Proceedings.

44. In accordance with the Appian Civil Claim Order:

(a) on October 9, 2025, the Appian Plaintiffs commenced the Appian Civil Claim;

(b) on November 25, 2025, Trevali Corp. filed and serve a Response to Civil Claim (the "**Appian Response**") in respect of the Appian Civil Claim; and

(c) the Appian Plaintiffs did not file any reply.

45. Following the exchange of the Appian Civil Claim and the Appian Response, the parties to the action, with the assistance of counsel, discussed and ultimately agreed on the terms of a procedural order to advance the Appian Civil Claim.

46. On March 24, 2026, this Court ordered and directed (the "**Appian Procedural Order**"), among other things:

(a) that the Appian Civil Claim be tried within the CCAA Proceedings and the parties submit to the jurisdiction of this Court under the CCAA to resolve all disputes in the Appian Civil Claim; and

(b) a procedural timeline in respect of the delivery of evidence, demands for documents, a case planning conference, among other pre-trial matters.

47. Prior to the delivery of evidence by the Appian Plaintiffs pursuant to the Appian Procedural Order, the parties reached a settlement resolving the Lead Indemnity Claim, the Tax Indemnity Claims, and all other claims arising out of or relating to the Appian SAPA and the Appian Transaction.

48. With an effective date of September 9, 2026, the Monitor, on behalf of Trevali Corp., and the Appian Plaintiffs executed the Appian Settlement Agreement.

49. The Settlement Agreement and the parties' obligations thereunder are conditional upon, among other things, the Settlement Agreement being approved by this Court.

50. Under the Settlement Agreement, the parties agreed:

(a) ANR RP Limited shall be paid US$5,700,000 (the "**Settlement Amount**") out of the Escrow Amount;

(b) the balance of the Escrow Amount plus any interest accrued thereon after payment of the Settlement Amount and any applicable fees and disbursements (the "**Remaining Amount**") shall be paid to Trevali Corp.;

(c) the Settlement Amount is a reduction of the Purchase Price under the Appian SAPA and to prepare and file any documents in accordance with such;

(d) to execute a joint written notice of release to the Escrow Agent to pay the Settlement Amount to ANR RP Limited and the Remaining Amount to Trevali Corp.; and

(e) to sign a consent dismissal order dismissing the Appian Civil Claim in its entirety, with prejudice and without costs.

51. Upon payment of the Settlement Amount to ANR RP Limited, the parties have mutually agreed to release each other from and against all claims of any kind of whatever nature, past or present, known or unknown, suspected or unsuspected, arising out of or in any way relating to the Lead Indemnity Claim, the Tax Indemnity Claims, the Appian SAPA or the Appian Transaction.

<u>Post-Filing Claims Process</u>

52. As described in the Twenty-Second Report of the Monitor dated November 28, 2025, the ARIO granted the D&O Charge in favour of the directors and officers of Trevali related to any obligations and liabilities that they may incur as directors and officers of Trevali since the Filing Date (the "**Post-Filing Claims**").

53. The D&O Charge is not to exceed CA$2,000,000, and the Monitor continues to hold US$1,300,000 subject to determining any potential claims.

54. To date, no Post-Filing Claims have been made to the Monitor.

55. In light of the substantial progress made in Trevali's restructuring to date, it is the Monitor's view that it is appropriate to undertake a limited claims process to discover and crystallize any potential post-filing claims against Trevali's directors and officers at this time.

56. The Post-Filing Claims Process is intended to call for and adjudicate (as necessary) post-filing claims against Trevali's directors and officers only. It will require all claimants wishing to assert such claims to submit a "Post-Filing Claim Form" to the Monitor no later than the "Claims Bar Date" of November 13, 2026. All submitted claims will then be adjudicated by the Monitor pursuant to standard procedures in a claims process.

57. Running this limited claims process at this time will create the necessary certainty as to the realm of Post-Filing Claims that may exist against Trevali's directors and officers which will crystallize any potential claims captured by the D&O Charge and allow the Monitor to deal with the funds it is holding subject to the D&O Charge.

Part 3: LEGAL BASIS

58. The Applicant relies on:

(a) *CCAA*, in particular, sections 11 and 11.02;

(b) *Supreme Court Civil Rules*, in particular Rules 8-1, 13-1 and 22-4;

(c) the inherent and equitable jurisdiction of this Court; and

(d) such further and other legal bases and authorities as counsel may advise and this Court may permit.

Stay Extension

59. Subsection 11.02 of the *CCAA* provides this Court with broad discretion to allow a debtor time and space to advance its restructuring efforts, including by extending a stay of proceedings. A stay of proceedings is the "central tool" by which the court maintains the *status quo* for a debtor, allowing a debtor the necessary time, flexibility and "breathing room" to carry out a supervised restructuring or organized sales process while continuing its ongoing operations. This includes time to arrange an acceptable sale of assets in order to maximize recovery for stakeholders.

> ***1057863 B.C. Ltd. (Re)*, 2022 BCSC 876 at paras. 31, 35, citing *Timminco Limited (Re)*, 2012 ONSC 2515 at para. 15.**

60. The baseline considerations and requirements for a stay extension are that a stay is "appropriate" and that debtors have been and are acting in good faith and with due diligence.

> ***CCAA*, ss. 11.02(2)–(3).**
> ***1057863 B.C. Ltd. (Re)*, 2022 BCSC 876 at para. 31.**

61. "Appropriateness" is assessed by inquiring whether the order sought advances the policy objectives underlying the *CCAA*. While the primary objective underlying the *CCAA* is to avoid the social and economic losses resulting from liquidation of an insolvent company, the *CCAA* has the simultaneous objectives of maximizing creditor recovery, preservation of going-concern value where possible, preservation of jobs and communities affected by the firm's financial distress and enhancement of the credit system generally. "Liquidating CCAAs" are now commonplace in the *CCAA* landscape.

> ***Century Services Inc. v. Canada (Attorney General)*, 2010 SCC 60 at para. 70.**
> ***9354-9185 Québec Inc. v. Callidus Capital Corp.*, 2020 SCC 10 at para. 42.**

62. The relative weight that the different objectives of the *CCAA* take on in a particular case may vary based on the factual circumstances, the stage of proceedings, or the proposed solutions that are presented to the court for approval. For example, "where a reorganization or liquidation is complete and the court is dealing with residual assets, the objective of maximizing creditor recovery from those assets may take centre stage."

> ***9354-9185 Québec Inc. v. Callidus Capital Corp.*, 2020 SCC 10 at para. 46.**

63. The Monitor and Trevali Corp. have been working in good faith and with due diligence and granting the Stay Extension is appropriate and necessary in the circumstances.

64. The Stay Extension will allow the Monitor to take further steps to maximize creditor recovery. Among other things, during the Stay Extension the Monitor may:

(a) attend to remaining post-closing matters associated with the Appian Transaction, in particular with respect to the Indemnity Escrow Agreement and related Indemnity Claims in this regard, including concluding the Settlement Agreement in accordance with the Appian Settlement Approval Order, if granted;

(b) resolve outstanding creditor claims;

(c) address any matters that may arise from the Glencore HST Appeal; and

(d) otherwise administer Trevali Corp.'s estate.

65. The cashflow included in the Twenty-Fifth Report indicates that Trevali Corp. will have sufficient liquidity during the period of the Stay Extension.

66. There is not any material financial prejudice to Trevali Corp.'s creditors as a result of the Stay of Proceedings being extended to March 31, 2027.

67. Granting the Stay Extension will allow the Monitor to continue the CCAA Proceedings and its efforts towards maximizing value for Trevali Corp.'s assets for the benefit of creditors.

68. The Monitor respectfully requests that this Court grant the Stay Extension.

<u>Second Interim Distribution</u>

69. Section 11 of the *CCAA*, provides the courts with jurisdiction to make any order that it considers appropriate in the circumstances:

> Despite anything in the *Bankruptcy and Insolvency Act* or the *Winding-up and Restructuring Act*, if an application is made under this Act in respect of a debtor company, the court, on the application of any person interested in the matter, may, subject to the restrictions set out in this Act, on notice to any other person or without notice as it may see fit, make any order that it considers appropriate in the circumstances.

***CCAA*, s. 11.**

70. Section 11 is a broad discretionary power, which "power is vast" and "constrained only by restrictions set out in the *CCAA* itself, and the requirement that the order made be "appropriate in the circumstances'." This discretion must be exercised in furtherance of the remedial objectives of the *CCAA*, including the baseline consideration of appropriateness, good faith, and due diligence.

***Canada v. Canada North Group Inc.*, 2021 SCC 30, at para. 21.**
***9354-9186 Quebec Inc. v. Callidus Corp.*, 2020 SCC 10 at paras. 67, 70.**

71. This broad jurisdiction provides the Court with the authority to approve distributions to creditors during a *CCAA* proceeding, even where such distributions occur outside of the parameters of plan of compromise or arrangement.

***Re Nortel Networks Corporation et al*, 2014 ONSC 4777, at paras. 53–61.**
***Hudson's Bay Company, Re*, 2025 ONSC 2903 at para. 22.**

72. Such a distribution can be interim or final, and may be distribution to unsecured or secured creditors.

***Re Nortel Networks Corporation et al*, 2014 ONSC 4777, at paras. 53–61.**

73. Unsecured creditor should be paid rateably.

***BIA*, s. 141.**

74. There are no Secured Claims that rank in priority to the unsecured creditors of Trevali Corp. with Proven Claims pursuant to the Claims Process Order.

75. Although the *CCAA* Proceedings are continuing, realizations to date have generated cash materially in excess of the operating needs of Trevali Corp.

> ***Hudson's Bay Company, Re*, 2025 ONSC 2903 at para. 15.**

76. The Monitor submits that a further distribution to unsecured creditors with Proven Claims is appropriate in the circumstances and furthers the remedial objectives of the *CCAA*, in particular given the nature of this proceeding as a liquidating *CCAA*.

77. The Second Interim Distribution, if made:

(a) provides an immediate partial recovery to Trevali Corp.'s unsecured creditors, increasing recovery to approximately 60% when combined with the First Interim Distribution; and

(b) the Holdback Reserve (as defined in the Twenty-Fifth Report) will be sufficient to fund the Monitor's remaining activities in respect of the Trevali Corp. estate and administer the CCAA Proceedings to its conclusion.

78. As such, the Second Interim Distribution is in the interest of stakeholders and appropriate in the circumstances. The Monitor respectfully requests that this Court grant the Second Interim Distribution Order.

Appian Settlement Approval

79. Pursuant to paragraph 4(w) of the EMP Order and paragraph 46 of the ARIO, the Monitor may apply to this Court for directions.

80. Pursuant to the Appian SAPA, as approved by this Court, the First Appian Civil Claim Order and the Second Appian Civil Claim Order, the Appian Civil Claim is to be resolved by this Court within the CCAA Proceedings.

81. This Court has jurisdiction to approve a settlement agreement pursuant to section 11 of the *CCAA*.

> ***Walter Energy Canada Holdings, Inc. (Re)*, 2017 BCSC 1968 at para. 32.**
> ***Trevali Mining Corporation (Re)*, 2022 BCSC 2442 at para. 6.**
> ***CCAA*, s. 11.**

82. Settlement agreements have frequently been approved in *CCAA* proceedings where a settlement avoids complex and costly legal contests and which contribute to advancing the restructuring on a timely and efficient basis.

> ***1057863 B.C. Ltd. (Re)*, 2024 BCSC 1111 at para. 14.**

83. Approving a settlement under the *CCAA* requires that this Court consider whether the settlement:

   (a) is fair and reasonable;

   (b) provides substantial benefit to the stakeholders; and

   (c) is consistent with the remedial purposes and objectives of the *CCAA*.

> ***Walter Energy Canada Holdings, Inc. (Re)*, 2017 BCSC 1968 at para. 33.**
> ***Trevali Mining Corporation (Re)*, 2022 BCSC 2442 at para. 7.**

84. In applying this test, courts will review a proposed settlement with the goal of facilitating a successful resolution for the company and stakeholders.

> ***Stelco Inc., Re*, 2005 CanLII 40140 (Ont. C.A.) at para. 18.**

85. The Monitor submits the Settlement Amount is fair and reasonable as:

   (a) the Settlement Agreement eliminates the uncertainty, risks and expense associated with continuing to litigate the Lead Indemnity Claim through trial and any subsequent appeals, and resolves potential exposure with respect to the Tax Indemnity Claims;

   (b) the outcome of the litigation and the Namibian Revenue Authority audit is uncertain, and the Indemnity Claims advanced by Appian represented actual costs incurred with respect to the Lead Indemnity Claim and potentially significant amounts owing to the Namibian Tax authorities arising from formal reassessments;

   (c) the Indemnity Claims are complex and involve the interpretation of a unique agreement (the Appian SAPA) negotiated in complicated circumstances, as is evident from the Appian Procedural Order and related exchange of allegations and voluminous anticipated evidence, which would result in lengthy and costly litigation without settlement;

(d) the Settlement Agreement provides a comprehensive resolution of all claims arising from or relating to the Appian SAPA and the Appian Transaction, including both asserted and potential future claims;

(e) the mutual releases provide finality and eliminates the risk of future litigation concerning the Appian Transaction; and

(f) the Settlement Agreement facilitates a timely realization and will result in a meaningful distribution to unsecured creditors of Trevali Corp.

86. Both the Monitor, on behalf of Trevali Corp., and the Appian Plaintiffs, through their respective counsel, have advanced the Appian Civil Claim pursuant to the Appian Civil Claim Order and the Appian Procedural Order. The Settlement Agreement is the result of significant good faith arms-length efforts of the parties.

87. In the present case, the approval and implementation of the Settlement Agreement will, among other things:

(a) provide recovery in the amount of approximately CA$8 million for Trevali Corp.'s estate;

(b) provide resolution of the Indemnity Claims, in particular the Appian Civil Claim, which will avoid significant future costs and efforts that would otherwise be required to resolve the Appian Civil Claim in particular;

(c) provides certainty and clarity to the parties and stakeholders on one of the last remaining issues in the CCAA Proceedings in a timely and efficient manner; and

(d) result in a further interim distribution to unsecured creditors.

88. In the circumstances and for the reasons as set out above, the Monitor submits that the Settlement Agreement should be approved as it is: (a) is fair and reasonable; (b) provides substantial benefit to the stakeholders; and (c) is consistent with the remedial purposes and objectives of the *CCAA*.

Post-Filing Claims Process

89. Claims process orders are common practice in CCAA proceedings. The jurisdiction to grant a claims process order arises from section 11 of the CCAA, which provides this Court with broad statutory authority to make such orders as are necessary to achieve the remedial objectives of the CCAA, provided they are "appropriate in the circumstances".

***Quest University Canada (Re)*, 2020 BCSC 1845 at para. 21 [*Quest University*].**

Bul River Mineral Corporation (Re), **2014 BCSC 1732 at paras. 29-32 [*Bul River*].**
Soccer Express Trading Corp. (Re), **2020 BCSC 749 at para. 106 [*Soccer Express*].**

90. There are "no set rules" for the contents of a claims process order, but the overarching objective is to obtain certainty as to quantum and validity of the prospective claims that may be made against a debtor company.

Soccer Express **at paras. 108-109.**
Bul River **at para. 32.**
Quest University **at para. 29**

91. Additional considerations include whether:

(a) the process and timelines in the proposed claims process are fair, reasonable, and designed with some idea of the issues that either have arisen or might arise in the restructuring;

(b) the proposed order allows for the usual steps and procedures, consistent with what has previously been approved in other restructurings; and

(c) the Monitor supports approval of the proposed claims process order.

Bul River **at para. 32.**
Soccer Express **at paras. 107-108.**
Pure Gold Mining Inc (Re), **(Unreported, May 10, 2023, S228723, Vancouver Registry).**

92. This Post-Filing Claims Process will provide the Monitor with certainty as to the realm of Post-Filing Claims, if any, that may be asserted against Trevali's directors and officers.

93. Running this limited claims process at this time will help to put the Monitor in a position to seek the Court's approval of a reduction or elimination of the D&O Charge created under the ARIO.

94. The terms of the proposed Post-Filing Claims Process are fair and reasonable. Implementing the Post-Filing Claims Process at this time is appropriate and prudent in the circumstances.

Part 4: MATERIAL TO BE RELIED ON

1. Twenty-Fifth Report of the Monitor dated September 18, 2026;

2. Amended and Restated Initial Order dated August 29, 2022, as amended and restated from time to time;

3. EMP Order dated June 28, 2023;

4. First Appian Civil Claim Order dated September 26, 2025;

5. First Interim Distribution Order dated December 8, 2025;

6. Second Appian Civil Claim Order dated March 24, 2026; and

7. Such further and other material as counsel for the Applicant may advise.

TO THE PERSONS RECEIVING THIS NOTICE OF APPLICATION: If you wish to respond to this Notice of Application, you must, within 5 business days after service of this Notice of Application or, if this application is brought under Rule 9-7, within 8 business days of service of this Notice of Application,

(a) file an Application Response in Form 33,

(b) file the original of every affidavit, and of every other document, that

  (i) you intend to refer to at the hearing of this application, and

  (ii) has not already been filed in the proceeding, and

(c) serve on the applicant 2 copies of the following, and on every other party of record one copy of the following:

  (i) a copy of the filed Application Response;

  (ii) a copy of each of the filed affidavits and other documents that you intend to refer to at the hearing of this application and that has not already been served on that person;

  (iii) if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7(9).

Date: 18/SEPT/2026

Signature of lawyer for the Applicants
Eamonn Watson

Dentons Canada LLP
Barristers and Solicitors
20th Floor, 250 Howe Street
Vancouver, BC V6C 3R8
Email:
john.sandrelli@dentons.com
eamonn.watson@dentons.com

To be completed by the court only:

Order made

☐ in the terms requested in paragraphs ______________ of Part 1 of this Notice of Application

☐ with the following variations and additional terms:

____

____

____

Date:

____
Signature of ☐ Judge ☐ Associate Judge

APPENDIX

THIS APPLICATION INVOLVES THE FOLLOWING:

☐ discovery: comply with demand for documents

☐ discovery: production of additional documents

☐ other matters concerning document discovery

☐ extend oral discovery

☐ other matter concerning oral discovery

☐ amend pleadings

☐ add/change parties

☐ summary judgment

☐ summary trial

☐ service

☐ mediation

☐ adjournments

☐ proceedings at trial

- ☐ case plan orders: amend
- ☐ case plan orders: other
- ☐ experts
- ☒ none of the above

SCHEDULE "A"

NO. S-226670
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 THE *BUSINESS CORPORATIONS ACT,*
S.B.C. 2002, C-57, AS AMENDED AND THE *BUSINESS CORPORATIONS ACT*, S.N.B. 1981, C. B-9.1, AS AMENDED

AND

AND IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF TREVALI MINING CORPORATION AND TREVALI MINING (NEW BRUNSWICK) LTD.

PETITIONERS

SERVICE LIST

As at March 18, 2026

Monitor's Website: http://cfcanada.fticonsulting.com/trevali/

Name of Counsel:	**Name of Parties:**
Blake, Cassels & Graydon LLP 1133 Melville Street Suite 3500, The Stack Vancouver, BC V6E 4E5 Tel. No. 604-631-3331 Attention: Peter Rubin Peter Bychawski Claire Hildebrand Alison Burns Email: peter.rubin@blakes.com; peter.bychawski@blakes.com; claire.hildebrand@blakes.com; alison.burns@blakes.com	*Counsel for Petitioners* *Trevali Mining Corporation and Trevali Mining (New Brunswick) Ltd.*

Name of Counsel:	Name of Parties:
FTI Consulting Canada Inc. Suite 1450, 701 West Georgia Street Vancouver, BC V7Y 1B6 Tel. No. 604.551.9881 Attention: Tom Powell Craig Munro Mike Clark E-mail: tom.powell@fticonsulting.com; craig.munro@fticonsulting.com; mike.clark@fticonsulting.com;	*Court Appointed Monitor*
Dentons Canada LLP 20th Floor, 250 Howe Street Vancouver, BC V6C 3R8 Tel. No. 604-687-4460 Attention: John R. Sandrelli Jordan Schultz Valerie Cross Eamonn Watson E-mail: john.sandrelli@dentons.com jordan.schultz@dentons.com valerie.cross@dentons.com eamonn.watson@dentons.com avic.arenas@dentons.com nav.sidhu@dentons.com	*Counsel to the Monitor, FTI Consulting Canada Inc.*
Fasken Martineau DuMoulin LLP Suite 2900, 550 Burrard Street Vancouver, BC V6C 0A3 Tel. No. (604) 631-4786 Attention: Stuart Brotman Kibben Jackson Glen Nesbitt Email: sbrotman@fasken.com kjackson@fasken.com gnesbitt@fasken.com	*Counsel for The Bank of Nova Scotia, as Administrative Agent*

Name of Counsel:	Name of Parties:
McCarthy Tétrault LLP Suite 2400 745 Thurlow Street Vancouver, BC V6E 0C5 Tel. No. 604-643-7154 Attention: Lance Williams Ashley Bowron Email: lwilliams@mccarthy.ca abowron@mccarthy.ca sdanielisz@mccarthy.ca	*Counsel to Glencore International AG, Glencore AG and Glencore Canada Corporation*
KND Complex Litigation 1186 Eglinton Ave West Toronto, Ontario M6C 2E3 Tel. No. 416-507-6592 Attention: Eli Karp Sage Nematollahi Taek Soo Shin Email: ek@knd.law sn@knd.law ts@knd.lawa	*Counsel to an ad hoc committee of Trevali Mining Corporation shareholders*
United Steelworkers Canadian National Office Legal Department 800-234 Eglinton Avenue East Toronto, ON M4P 1K7 Tel. No. 416-544-5980 Attention: Kristina Adhikari Email: kadhikari@usw.ca	*Counsel for United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, Local 1-306 (Caribou Mine)*
Osler, Hoskin & Harcourt LLP Suite 3000, Bentall 4 1055 Dunsmuir Street Vancouver, BC V7X 1K8 Tel. No. 236-466-2816 Attention: Mary I.A. Buttery, K.C. Amanda Manasterski Brodie Noga Email: mbuttery@osler.com amanasterski@osler.com bnoga@osler.com	*Counsel for the Directors of Trevali Mining Corporation*

Name of Counsel:	Name of Parties:
British Columbia Regional Office Department of Justice Canada 900 – 840 Howe Street Vancouver, British Columbia V6Z 2S9 Tel. No. 587-930-5282 Attention: Aminollah Sabzevari Email: Aminollah.Sabzevari@justice.gc.ca	*His Majesty the King in Right of Canada*
Office of the Attorney General Chancery Place 2078 - 675 King Street P.O. Box 6000 Fredericton, NB E3B 5H1 Tel. No. (506) 462-5100 Attention: Christopher Whibbs Email: Christopher.Whibbs@gnb.ca	*His Majesty the King in Right of the Province of New Brunswick, as represented by the Department of Natural Resources and Energy Development*
McMillan LLP Royal Centre, 1055 W. Georgia Street, Suite 1500 PO Box 11117 Vancouver, BC V6E 4N7 Tel. No. (604) 691-6848 Attention: Tevia Jeffries Email: tevia.jeffries@mcmillan.ca kristine.jang@mcmillan.ca	*His Majesty the King in Right of the Province of New Brunswick, as represented by the Department of Natural Resources and Energy Development*
Lawson Lundell LLP 1600 - 925 West Georgia Street, Vancouver, BC V6C 3L2 Tel. No. 604-631-9163 Attention: William L. Roberts Email: wroberts@lawsonlundell.com	*Counsel for Graymont Limited and Graymont (NB) Inc.*
New Brunswick Power Corporation 515 King Street P.O. Box 2010 Fredericton, NB E3B 5G4 Tel. No. 506-458-3939 Attention: Leanne Murray Emails: LMurray@nbpower.com	*Counsel for NB Power Corporation*

Name of Counsel:	Name of Parties:
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DS Lawyers Canada LLP 1080 côte du Beaver Hall #2100 Montréal QC H2Z 1S8 Tel: (514) 360-5102 Attention: Jean-Yves Simard Email: jysimard@dsavocats.ca	*Counsel for Magotteaux Ltd.*
Cassels Brock & Blackwell LLP Suite 2100, Scotia Plaza, 40 King St. W. Toronto, ON M5H 3C2 Tel: (416) 860-5225 Attention: John Birch Jared Enns Emails: jbirch@cassels.com jenns@cassels.com Cassels Brock & Blackwell LLP Suite 2200, RBC Place 885 West Georgia St. Vancouver, BC V6C 3E8 Tel: (778) 372-6787 Attention: Vicki Tickle Email: vtickle@cassels.com	*Counsel for XL Specialty Insurance Company*

Name of Counsel:	Name of Parties:
Stikeman Elliott LLP 1155 René-Lévesque Blvd. West 41st Floor Montréal, Québec H3B 3V2 Tel: (514) 397-6495 Attention: Danny Duy Vu / Darin Renton / Sam Dukesz/ Lee Nicholson / Aaron Kreaden Email: ddvu@stikeman.com DRenton@stikeman.com SDukesz@stikeman.com leenicholson@stikeman.com AKreaden@stikeman.com	*Counsel for Appian Natural Resources Fund III LP / Appian Natural Resource Fund (UST) III LP*
Stikeman Elliott LLP Barristers & Solicitors 5300 Commerce Court West, 199 Bay Street Toronto, ON M5L 1B9 Tel:. (416) 869-5230 Attention: Maria Konyukhova / Kyle Allen Email: mkonyukhova@stikeman.com Kyle.Allen2@orica.com	*Counsel for Orica Canada Inc.*
Chaitons LLP 5000 Yonge Street - 10th Floor Toronto, ON, M2N 7E9 Tel: 416.218.1161 Attention: Maya Poliak Emails: Maya@chaitons.com; lyndac@chaitons.com	*Counsel for DSS Sustainable Solutions Canada Inc.*
Fogler, Rubinoff LLP 77 King Street West Suite 3000, P.O. Box 95 TD Centre North Tower Toronto, ON M5K 1G8 Tel: 416. 941.8842 Attention: Vern W. DaRe / Rick Moscone Emails: vdare@foglers.com rmoscone@foglers.com	*Counsel for Eagle Pass Mining Corp.*

Name of Counsel:	Name of Parties:
Koskie Glavin Gordon 1630 – 1177 West Hastings Street, Vancouver, BC V6E 2K3 Tel: (604) 734-8001 Attention: Don Bobert Email: dbobert@koskieglavin.com	*Counsel for United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, Local 1-306(Caribou Mine).*

EMAIL SERVICE LIST:

peter.rubin@blakes.com; peter.bychawski@blakes.com; claire.hildebrand@blakes.com; alison.burns@blakes.com; tom.powell@fticonsulting.com; craig.munro@fticonsulting.com; mike.clark@fticonsulting.com; john.sandrelli@dentons.com; jordan.schultz@dentons.com; valerie.cross@dentons.com; eamonn.watson@dentons.com; avic.arenas@dentons.com; nav.sidhu@dentons.com; sbrotman@fasken.com; kjackson@fasken.com; lwilliams@mccarthy.ca; abowron@mccarthy.ca; sdanielisz@mccarthy.ca; ek@knd.law; sn@knd.law; ts@knd.law; kadhikari@usw.ca; mbuttery@osler.com; amanasterski@osler.com; Aminollah.Sabzevari@justice.gc.ca; Christopher.Whibbs@gnb.ca; wroberts@lawsonlundell.com; LMurray@nbpower.com; tony.richardson@mcinnescooper.com; colin.brousson@dlapiper.com; jysimard@dsavocats.ca; jbirch@cassels.com; wonyeaju@cassels.com; gnesbitt@fasken.com; ddvu@stikeman.com; DRenton@stikeman.com; jenns@cassels.com; mkonyukhova@stikeman.com; Kyle.Allen2@orica.com; Maya@chaitons.com; lyndac@chaitons.com; vdare@foglers.com; rmoscone@foglers.com; SDukesz@stikeman.com; vtickle@cassels.com; leenicholson@stikeman.com; AKreaden@stikeman.com; tevia.jeffries@mcmillan.ca; kristine.jang@mcmillan.ca; dbobert@koskieglavin.com;

SCHEDULE "B"

No. S-226670
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 THE *BUSINESS CORPORATIONS ACT*, S.B.C. 2002, c. 57, AS AMENDED AND THE *BUSINESS CORPORATIONS ACT*, S.N.B. 1981, c. B-9.1, AS AMENDED

AND

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF TREVALI MINING CORPORATION AND TREVALI MINING (NEW BRUNSWICK) LTD.

PETITIONERS

ORDER MADE AFTER APPLICATION
(STAY EXTENSION AND SECOND INTERIM DISTRIBUTION ORDER)

	)		)	
BEFORE	)	THE HONOURABLE MADAM	)	29/SEPT/2026
	)	JUSTICE FITZPATRICK	)	

ON THE APPLICATION of FTI Consulting Canada Inc., in its capacity as court-appointed monitor of Trevali Mining Corporation and Trevali Mining (New Brunswick) Ltd. (in such capacity, the "**Monitor**"), coming on for hearing at Vancouver, British Columbia, on the 29th day of September, 2026; AND ON HEARING John Sandrelli and Eamonn Watson, counsel for the Monitor, and those other counsel listed on **Schedule "A"** hereto; AND UPON READING the material filed, including the Twenty-Fifth Report of the Monitor dated September 18, 2026 (the "**Monitor's Report**"); AND pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36 as amended, the British Columbia *Supreme Court Civil Rules*, and the inherent jurisdiction of this Honourable Court;

THIS COURT ORDERS that:

Service

1. The time for service of the Notice of Application filed September 18, 2026, and supporting materials is hereby abridged such that the Notice of Application filed September 18, 2026, is properly returnable today and service thereof upon any interested party other than those parties on the Service List (as defined in the Amended and Restated Initial Order of this Court dated August 29, 2022) maintained by the Monitor for these proceedings is hereby dispensed with.

Stay Extension

2. The Stay Period (as defined in the Amended and Restated Initial Order of this Court dated August 29, 2022) with respect to Trevali Mining Corporation is hereby extended up to and including March 31, 2027.

Second Interim Distribution to Unsecured Creditors

3. The Monitor, on behalf of Trevali Mining Corporation ("**Trevali Corp.**"), is hereby authorized, directed and empowered to make an interim distribution to all Creditors with Proven Claims against Trevali Corp., as confirmed by the Order of this Court granted December 8, 2025, and subject to the requirements in paragraph 6 hereof, in the total amount of CA$8,100,000.00 (the "**Second Interim Distribution**") from the funds in the possession of Trevali Corp.

4. The Second Interim Distribution shall be paid rateably to all Creditors with Proven Claims against Trevali Corp.

5. Any payments made by the Monitor in accordance with this Order shall not constitute a "distribution", and the Monitor shall not constitute a "legal representative", "receiver" or "representative" of Trevali Corp. or "other person" for the purposes of Section 159 of the *Income Tax Act* (Canada), Section 270 of the *Excise Tax Act* (Canada), Section 46 of the *Employment Insurance Act* (Canada), or any other similar federal, provincial or territorial tax legislation in the Provinces or Territories in which Trevali Corp. conducted business (collectively, the "**Statutes**"), and the Monitor in making any such payment or deliveries of funds in accordance with this Order: (i) is not "distributing", nor shall it be considered to have "distributed", such funds or assets for the purposes of the Statutes; (ii) shall not incur any liability under the Statutes for making any payments or deliveries in accordance with this Order or failing to withhold amounts, ordered or permitted hereunder; (iii) shall not have any liability for any of Trevali Corp.'s tax liabilities regardless of how or when such liabilities may have arisen; and (iv) is hereby forever released, remised and

discharged from any claims against the Monitor under or pursuant to the Statutes or otherwise at law, arising as a result of the payments and deliveries in accordance with this Order, and any claims of such nature are hereby forever barred.

6. Without limited paragraph 5 hereof, the Monitor or any other person facilitating payments pursuant to this Order is hereby authorized and empowered, but not required, to deduct and withhold from any such payments such amounts as may be required to be deducted or withheld under any applicable law including, without limitation, any tax withholdings, statutory deductions and any employment insurance overpayments, and to remit such amounts to the appropriate governmental authority or other person entitled thereto as may be required by such law.

7. All payments shall be made in Canadian dollars, regardless of the currency indicated in the applicable Proof of Claim or otherwise, calculated by the Monitor as at the Filing Date, in accordance with paragraph 3 of the Claims Process Order.

8. All payments made by the Monitor pursuant to and in accordance with this Order shall be free and clear of any encumbrances or charges created by any order pronounced in these *CCAA* proceedings, including, but not limited to, the Amended and Restated Initial Order pronounced on August 29, 2022.

9. Notwithstanding:

(a) the pendency of these *CCAA* proceedings or termination of these *CCAA* proceedings;

(b) any applications for a bankruptcy order in respect of Trevali Corp. now or hereafter made pursuant to the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended (the "***BIA***") and any bankruptcy order issued pursuant to any such applications; or

(c) any assignment in bankruptcy made by or in respect of Trevali Corp.,

any payments made pursuant to this Order are final and irreversible and shall be binding on any trustee in bankruptcy that may be appointed in respect of Trevali Corp. and shall not be void or voidable by creditors of Trevali Corp., nor shall it constitute or be deemed to be a transfer at undervalue, fraudulent preference, assignment, fraudulent conveyance or other reviewable transaction under the *BIA* or any other applicable federal or provincial legislation, nor shall it constitute oppressive or unfairly prejudicial conduct pursuant to any applicable federal or provincial legislation, and shall, upon the receipt thereof, be free of all claims, liens, security interests, charges, or other encumbrances granted by or relating to Trevali Corp.

10. The Monitor, whether in its personal capacity or in its capacity as the Monitor:

(a) shall have all of the protections provided to it as an officer of the Court, including the protections granted pursuant to the *CCAA* and other orders granted in these *CCAA* proceedings; and

(b) shall incur no liability or obligation as a result of carrying out any duties or work in connection with this Order, save and except for any gross negligence or willful misconduct.

11. The Monitor shall be at liberty, and is hereby authorized and empowered to take any further steps that the Monitor deems necessary or desirable in Order to complete the payments described in and authorized by this Order.

General

12. THIS COURT REQUESTS the aid and recognition of other Canadian and foreign Courts, tribunal, regulatory or administrative bodies, including any Court or administrative tribunal of any federal or State Court or administrative body in the United States of America, Burkina Faso, Namibia and South Africa to act in aid of and to be complementary to this Court in carrying out the terms of this Order where required. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to Trevali Mining Corporation and the Monitor, as an officer of this Court, as may be necessary or desirable to give effect to this Order, to grant representative status to the Monitor in any foreign proceeding, or to assist Trevali Mining Corporation and the Monitor and their respective agents in carrying out the terms of this Order.

13. Endorsement of this Order by counsel appearing on this application other than counsel for the Monitor is hereby dispensed with.

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT:

Signature of Eamonn Watson
Lawyer for the Monitor

By the Court.

Registrar

SCHEDULE "A"

LIST OF COUNSEL

Counsel Name	Party Represented

SCHEDULE "C"

No. S-226670
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 THE *BUSINESS CORPORATIONS ACT*, S.B.C. 2002, C. 57, AS AMENDED AND THE *BUSINESS CORPORATIONS ACT*, S.N.B. 1981, C. B-9.1, AS AMENDED

AND

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF TREVALI MINING CORPORATION AND TREVALI MINING (NEW BRUNSWICK) LTD.

PETITIONERS

ORDER MADE AFTER APPLICATION
(APPIAN SETTLEMENT APPROVAL ORDER)

BEFORE	) THE HONOURABLE MADAM JUSTICE FITZPATRICK	)	29/SEPT/2026

ON THE APPLICATION of FTI Consulting Canada Inc., in its capacity as court-appointed monitor (in such capacity, the "**Monitor**") of Trevali Mining Corporation ("**Trevali Corp.**") and Trevali Mining (New Brunswick) Ltd., coming on for hearing at Vancouver, British Columbia, on the 29th day of September, 2026; AND ON HEARING John Sandrelli and Eamonn Watson, counsel for the Monitor, and those other counsel listed on **Schedule "A"** hereto; AND UPON READING the material filed, including the Twenty-Fifth Report of the Monitor dated September 18, 2026 (the "**Monitor's Report**"); AND pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended, the British Columbia *Supreme Court Civil Rules*, and the inherent jurisdiction of this Honourable Court;

THIS COURT ORDERS AND DECLARES that:

Service

1. The time for service of the Notice of Application filed September 18, 2026, and supporting materials is hereby abridged such that the Notice of Application filed September 18, 2026, is properly returnable today and service thereof upon any interested party other than those parties on the Service List (as defined in the Amended and Restated Initial Order granted August 29, 2022) maintained by the Monitor, for these proceedings is hereby dispensed with.

Settlement Agreement Approval

2. The Settlement Agreement dated September 9, 2026 (the "**Settlement Agreement**") among Appian Natural Resources Fund III LP, Appian Natural Resources (UST) Fund III LP, ANR RP Limited and Rosh Pinah Zinc Corporation (Pty) Ltd. (collectively, the "**Appian Plaintiffs**"), Trevali Corp., and the Monitor, a copy of which is attached as Appendix "A" to the Monitor's Report, is hereby approved in its entirety.

3. The execution of the Settlement Agreement by the Monitor, on behalf of Trevali Corp., is hereby authorized and approved.

4. Trevali Corp. is hereby authorized to perform its obligations under the Settlement Agreement and the Monitor, on behalf of Trevali Corp., is hereby authorized and directed to carry out the terms of the Settlement Agreement and take such additional steps and execute such additional documents as may be necessary or desirable for the implementation of the Settlement Agreement.

5. This Order shall constitute the only authorization required by the Monitor, on behalf of Trevali Corp., to proceed with implementing the Settlement Agreement, and no director, shareholder or other approvals shall be required in connection therewith, save for those authorizations contemplated in the Settlement Agreement.

General

6. THIS COURT REQUESTS the aid and recognition of other Canadian and foreign Courts, tribunal, regulatory or administrative bodies, including any Court or administrative tribunal of any federal or State Court or administrative body in the United States of America, Burkina Faso, Namibia and South Africa to act in aid of and to be complementary to this Court in carrying out the terms of this Order where required. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to Trevali Corp. and the Monitor as officer of this

Court, as may be necessary or desirable to give effect to this Order, to grant representative status to the Monitor in any foreign proceeding, or to assist Trevali Corp. and the Monitor, and their respective agents in carrying out the terms of this Order.

7. The Monitor or any other party have liberty to apply for such further or other directions or relief as may be necessary or desirable to give effect to this Order.

8. Endorsement of this Order by counsel appearing on this application other than counsel for the Monitor is hereby dispensed with.

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT:

____
Signature of Eamonn Watson
Lawyer for the Monitor

By the Court.

____
Registrar

SCHEDULE "D"

No. S-226670
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 THE *BUSINESS CORPORATIONS ACT*, S.B.C. 2002, C. 57, AS AMENDED AND THE *BUSINESS CORPORATIONS ACT*, S.N.B. 1981, C. B-9.1, AS AMENDED

AND

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF TREVALI MINING CORPORATION AND TREVALI MINING (NEW BRUNSWICK) LTD.

PETITIONERS

ORDER MADE AFTER APPLICATION
(POST-FILING CLAIMS PROCESS ORDER)

	)		)	
BEFORE	)	THE HONOURABLE MADAM	)	29/SEPT/2026
	)	JUSTICE FITZPATRICK	)	
	)		)	

ON THE APPLICATION of FTI Consulting Canada Inc., in its capacity as court-appointed monitor (in such capacity, the "**Monitor**") of Trevali Mining Corporation ("**Trevali Corp.**") and Trevali Mining (New Brunswick) Ltd. ("**Trevali NB**", and collectively with Trevali Corp., "**Trevali**"), coming on for hearing at Vancouver, British Columbia, on the 29th day of September, 2026; AND ON HEARING Eamonn Watson, counsel for the Monitor, and those other counsel listed on **Schedule "A"** hereto; AND UPON READING the material filed, including the Twenty-Fifth Report of the Monitor dated September 18, 2026 (the "**Monitor's Report**"); AND pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended, the British Columbia *Supreme Court Civil Rules*, and the inherent jurisdiction of this Honourable Court;

THIS COURT ORDERS AND DECLARES that:

Service

1. The time for service of the Notice of Application filed September 18, 2026, and supporting materials is hereby abridged such that the Notice of Application filed September 18, 2026, is properly returnable today and service thereof upon any interested party other than those parties on the Service List (as defined in the ARIO) maintained by the Monitor, for these proceedings is hereby dispensed with.

Definitions, Time, and Currency Denomination

2. All capitalized terms not otherwise defined in this Post-Filing Claims Process Order shall have the definitions set out in **Schedule "B"** hereto.

3. All references herein as to time shall mean local time in Vancouver, British Columbia, Canada, any reference to an event occurring on a Business Day shall mean prior to 4:00 p.m. on such Business Day unless otherwise indicated herein, and any event that occurs on a day that is not a Business Day shall be deemed to occur on the next Business Day.

4. Any Claims denominated in a currency other than Canadian Dollars shall be converted into Canadian Dollars at the applicable Bank of Canada exchange rates published on the Filing Date.

Post-Filing Claims Process

Post-Filing Claims Process Approved

5. The Post-Filing Claims Process set out herein, including the Claims Bar Date, is hereby approved.

6. As soon as reasonably practicable, the Monitor shall post and maintain the Press Release and the Claims Process Instruction Letter with respect to this Post-Filing Claims Process on the Monitor's Website, and the Monitor shall cause the Press Release to be published in The Globe and Mail, or an equivalent national newspaper, for one Business Day.

7. The Monitor may, but is not required to, deliver the Claims Process Instructions Letter to any Person as the Monitor may deem appropriate.

8. To the extent that any Post-Filing Claimant who does not receive the Claims Process Instructions Letter seeks documents related to the Post-Filing Claims Process prior to the Claims Bar Date, such a request shall be made to the Monitor and the Monitor shall cause a copy of the Claims Process Instructions Letter and Post-Filing Claims Process Order to be sent to such Post-Filing Claimant or direct the Post-Filing Claimant to the documents posted on the Monitor's Website, and otherwise respond to any reasonable request relating to the Post-Filing Claim process as may be appropriate in the circumstances.

Post-Filing Claims

9. Any Post-Filing Claimant that wishes to assert a Claim must submit a Post-Filing Claim Form to the Monitor in the manner set out in paragraph 27 hereof so that the Post-Filing

Claim Form is received by the Monitor no later than the Claims Bar Date. Failure to submit a Post-Filing Claim Form to the Monitor by the Claims Bar Date will result in such Post-Filing Claimant's Claim being forever barred and extinguished and, for greater certainty, such Post-Filing Claimant will be forever prohibited from making or enforcing a Post-Filing Claim against Trevali Corp.'s or Trevali NB's Directors or Officers.

Adjudication of Claims

10. If a Post-Filing Claimant delivers a Post-Filing Claim Form in accordance with the Post-Filing Claims Process set out herein, the Monitor, in consultation with any Director or Officer, or their counsel, against whom a Post-Filing Claim is asserted (as the Monitor may deem appropriate), will either:

    (a) accept the Claim set out in such Post-Filing Claim Form in its entirety;

    (b) revise the amount, secured status, or priority of the Claim set out in the Post-Filing Claim Form for voting and distribution purposes; or

    (c) disallow the Claim set out in the Post-Filing Claim Form in its entirety for voting and distribution purposes.

11. The Monitor may request any further documentation from a Post-Filing Claimant that the Monitor may require to enable them to consider and determine the validity of a Claim.

12. If the Monitor, in consultation with any Director or Officer, or their counsel, against whom a Post-Filing Claim is asserted (as the Monitor may deem appropriate), disallows a Claim or disputes the amount, secured status, or priority of the Claim set out in a Post-Filing Claim Form the Monitor, in consultation with any Director or Officer, or their counsel, against whom a Post-Filing Claim is asserted (as the Monitor may deem appropriate), shall, no later than 21 Business Days after the Claims Bar Date, send a Notice of Revision or Disallowance to the Post-Filing Claimant advising that the Post-Filing Claimant's Claim as set out in its Post-Filing Claim Form has been revised or disallowed and the reasons therefor. If the Monitor does not send a Notice of Revision or Disallowance to a Post-Filing Claimant by such date, the Claim as set out in the applicable Post-Filing Claim Form shall be a Proven Claim (unless otherwise provided in a subsequent order of this Court).

13. Any Post-Filing Claimant who is sent a Notice of Revision or Disallowance pursuant to paragraph 12 hereof and who wishes to dispute such Notice of Revision or Disallowance must:

    (a) within five Business Days after the date of delivery of the applicable Notice of Revision or Disallowance, or such other date as may be agreed to by the Monitor, deliver a completed Notice of Dispute of Revision or Disallowance to the Monitor in accordance with paragraph 27 hereof; and

    (b) within 15 Business Days after the date of delivery of the applicable Notice of Revision or Disallowance, or such other date as may be agreed to by the Monitor, or this Court may order, file and serve on the Monitor, a Notice of Application seeking to appeal the Notice of Revision or Disallowance, along with all supporting affidavit material. Any appeal from a Notice of Revision or Disallowance shall proceed as a hearing *de novo*, and the parties may adduce evidence in respect of the Claim not previously included in connection with Post-Filing Claim Form or in connection with the corresponding Notice of Revision or Disallowance.

14. If a Post-Filing Claimant who is sent a Notice of Revision or Disallowance pursuant to paragraph 12 hereof fails to deliver a Notice of Dispute of Revision or Disallowance and a Notice of Application in accordance with paragraph 13 hereof, then, subject only to further order of this Court, the Claim shall be deemed accepted at the amount, secured status, and priority set forth in the Notice of Revision or Disallowance, if any, and the Post-Filing Claimant will:

(a) if the entire Claim is disallowed:

(i) not be entitled to attend any creditors' meeting or vote on any Plan if one is filed on account of such Claim;

(ii) not be permitted to participate in any distribution authorized by the Court in these proceedings or receive any other distributions or consideration under any Plan if one is filed on account of any such Claim;

(iii) not be entitled to receive any further notice in respect of the Post-Filing Claims Process; and

(iv) be forever barred and enjoined from asserting or enforcing any Claim against any of Trevali Corp.'s or Trevali NB's Directors or Officers, and all such Claims shall be forever barred and extinguished; and

(b) where the Claim has been revised:

(i) possess a Proven Claim in the amount, secured status and priority of such revised Claim;

(ii) only be entitled to vote on any Plan if one is filed to the extent of the amount, secured status, or priority of such revised Claim;

(iii) only be entitled to receive any distribution authorized by the Court in these proceedings or any distributions or other consideration under any Plan if one is filed in an amount proportionate to the revised amount and in accordance with any revised security status or priority of such Claim; and

(iv) be forever barred and enjoined from asserting or enforcing any Claim (A) greater than the revised amount, or (B) with a different security status or priority against Trevali Corp.'s or Trevali NB's Directors and/or Officers.

15. The Claims Bar Date and the amount and status of every Proven Claim as determined under the Post-Filing Claims Process, including any determination as to the nature, amount, value, priority or validity of any Claim, shall be final for all purposes including in respect of any Plan and voting thereon (unless otherwise provided for in any subsequent order of this Court), and for any distribution made or consideration provided to Post-Filing Proven Creditors, whether in these CCAA Proceedings or in any of the proceedings authorized by this Court or permitted by statute, including a receivership proceeding, an arrangement proceeding or a bankruptcy affecting Trevali Corp. or Trevali NB.

NOTICE OF TRANSFEREES

16. If the holder of a Claim has transferred or assigned all or part of such Claim to another Person, the Monitor shall not be obligated to give notice or otherwise deal with the transferee or assignee of such Claim in respect thereof unless and until actual written notice of such transfer or assignment, together with satisfactory evidence of such transfer or assignment, has been received and acknowledged in writing by the Monitor. Subject to further order of this Court, any transferee or assignee of a Claim: (i) shall for the purposes of the Post-Filing Claims Process be bound by any notices given or steps taken in respect of such Claim in accordance with the Post-Filing Claims Process prior to receipt and acknowledgement by the Monitor of satisfactory evidence of such transfer or assignment; (ii) takes the Claim subject to any defences or rights which Trevali may have in respect thereof, including any claim with respect to which the affected Director or Officer may be entitled. For greater certainty: (i) a transferee or assignee of a Claim is not entitled to set-off, apply, merge, consolidate or combine any Claims assigned or transferred to it against or on account or in reduction of any amounts owing by any Director or Officer; and (ii) Claims acquired by a transferee or assignee will not merge, consolidate or combine with any of the transferee's or assignee's other Claims.

17. Reference to a transfer in this Post-Filing Claims Process Order includes a transfer or assignment whether absolute or intended as security.

THE MONITOR

18. The Monitor shall, in consultation with any Director or Officer, or their counsel, against whom a Claim is asserted (as the Monitor may deem appropriate), review the Post-Filing Claim Forms submitted by Post-Filing Claimants. The Monitor shall provide any Director or Officer against whom a Claim is made, or their counsel, with copies of all Post-Filing Claim Forms submitted by Post-Filing Claimants and any other documents delivered to the Monitor pursuant to the Post-Filing Claims Process.

19. The Monitor is hereby authorized to use reasonable discretion as to the adequacy of compliance with respect to the way Post-Filing Claim Forms delivered hereunder are completed and executed and the time by which they are submitted and may waive strict compliance with the requirements of this Post-Filing Claims Process Order.

20. Copies of any Post-Filing Claim Forms delivered by or to a Post-Filing Claimant shall be maintained by the Monitor and, upon written request, the Monitor shall provide such Post-Filing Claimant with a copy of a Post-Filing Claim Form.

21. The Monitor, in addition to its prescribed rights, duties, responsibilities and obligations under the CCAA, the ARIO and the EMP Order, shall implement and administer the Post-Filing Claims Process, including the determination of Claims of Post-Filing Claimants, and is hereby directed and empowered to take such other actions and fulfill such other roles as are contemplated by this Post-Filing Claims Process Order.

22. The Monitor: (i) in carrying out its obligations under this Post-Filing Claims Process Order, shall have all of the protections given to it by the CCAA, the ARIO and the EMP Order, and as an officer of this Court, including the stay of proceedings in its favour; (ii) shall incur no liability or obligation as a result of the carrying out of its obligations under this Post-Filing Claims Process Order, save and except in the event of any gross negligence or

wilful misconduct on the part of the Monitor; (iii) shall be entitled to rely on the books and records of Trevali, and any information provided by Trevali, all without independent investigations; and (iv) shall not be liable for any claims or damages resulting from any errors or omissions in such books, records, or information.

23. Notwithstanding anything to the contrary herein, the Monitor may at any time:

(a) refer a Claim for resolution to this Court for any purpose where in the Monitor's discretion, in consultation with any Director or Officer, or their counsel, against whom a Claim is asserted (as the Monitor may deem appropriate), such a referral is preferable or necessary for the resolution or the valuation of the Claim;

(b) in writing, accept the amount of a Claim for voting and/or distribution purposes without prejudice to the right of any affected Director or Officer to later contest the validity or amount of such Claim;

(c) settle and resolve, in consultation with any Director or Officer, or their counsel, any disputed Claims in writing; and

(d) extend the time period within which the Monitor, a Post-Filing Claimant, a Post-Filing Proven Creditor, or any other party is required to take any steps related to adjudication of Claims pursuant to this Post-Filing Claims Process Order, including without limitation the time period set out in paragraph 12 for delivery by the Monitor of a Notice of Revision or Disallowance to a Post-Filing Claimant, the time period set out in paragraph 13 for delivery of a Notice of Application seeking to appeal a Revision or Disallowance and supporting affidavit material by a Post-Filing Claimant or a Post-Filing Proven Creditor, and the time period for any response of the Monitor, or a Director or Officer, as the case may be, to a Notice of Application seeking to appeal a Revision or Disallowance and supporting affidavit material, provided that no extension of time by the Monitor with respect to the adjudication of Claims pursuant to this section or otherwise shall impact a Post-Filing Claimant's obligation to deliver a Post-Filing Claim Form to the Monitor pursuant to paragraph 9 or the application of the Claims Bar Date to any Post-Filing Claimant.

SERVICE AND NOTICES

24. Each of the:

(a) Post-Filing Claims Process Instruction Letter attached as **Schedule "C"**;

(b) Post-Filing Claim Form attached as **Schedule "D"**;

(c) Notice of Revision or Disallowance attached as **Schedule "E"**;

(d) Notice of Dispute of Revision or Disallowance attached as **Schedule "F"**; and

(e) Press Release attached as **Schedule "G"**;

are hereby approved in substantially the forms attached. Despite the foregoing, the Monitor may make amendments to such forms as it considers necessary or desirable, provided such amendments do not materially alter the substance of said forms.

25. Publication of the Press Release for one Business Day in The Globe and Mail, or an equivalent national newspaper, posting and maintaining the Post-Filing Claims Process Order and the Claims Process Instruction Letter on the Monitor's Website and serving the Post-Filing Claims Process Order on the Service List, and completion of the other requirements of this Post-Filing Claims Process Order shall constitute good and sufficient service and delivery of notice of this Post-Filing Claims Process Order, the Post-Filing Claims Process, and the Claims Bar Date on all Persons, and no other notice or service need be given or made and no other document or material need be sent to or served upon any Person in respect of this Post-Filing Claims Process Order or the Post-Filing Claims Process.

26. The Monitor may, unless otherwise specified by this Post-Filing Claims Process Order, serve and deliver any letters, notices or other documents including the Claims Process Forms to Post-Filing Claimants, Post-Filing Proven Creditors, or any other Person by forwarding copies thereof by prepaid ordinary mail, courier, personal delivery or email to such Persons at their respective addresses or contact information as last shown on the records of Trevali or set out in a Claims Process Form. Any such service and delivery shall be deemed to have been received by a Post-Filing Claimant or a Post-Filing Proven Creditor: (i) if sent by ordinary mail, on the third Business Day after mailing within British Columbia, the fifth Business Day after mailing within Canada (other than within British Columbia), and the seventh Business Day after mailing internationally; (ii) if sent by courier or personal delivery, on the next Business Day following dispatch; and (iii) if delivered by email by 4:00 p.m. on a Business Day, on such Business Day, and if delivered after 4:00 p.m. or other than on a Business Day, on the following Business Day.

27. Any Claims Process Forms required to be provided or delivered by a Post-Filing Claimant or a Post-Filing Proven Creditor to the Monitor under this Post-Filing Claims Process Order, shall be in writing in substantially the form, if any, provided for in this Post-Filing Claims Process Order and will be sufficiently given only if delivered by prepaid registered mail, courier, personal delivery, facsimile transmission, or email addressed to:

> FTI Consulting Canada Inc.
> In its capacity as Monitor of
> Trevali Mining Corporation and
> Trevali Mining (New Brunswick) Ltd.
>
> 701 West Georgia Street
> Suite 1650, PO Box 10089
> Vancouver, BC V7Y 1B6
> Attn: Tessa Chiricosta
> Telephone: 1-877-294-8998
> Fax: 403-232-6116
> Email: trevali@fticonsulting.com

28. Any notice or communication sent by a Post-Filing Claimant or a Post-Filing Proven Creditor shall be deemed to be received upon actual receipt thereof by the Monitor before 4:00 p.m. (Vancouver time) on a Business Day or, if delivered after 4:00 p.m. (Vancouver time) or other than on a Business Day, on the next Business Day.

29. If, during any period in which notice or other communications are being given or sent pursuant to this Post-Filing Claims Process Order, a postal strike or postal work stoppage

of general application should occur, such notice or other communications sent by ordinary or prepaid registered mail and then not received shall not, absent further order, be effective and notices and other communications given hereunder during the course of any such postal strike or work stoppage of general application shall only be effective if given by courier, personal delivery, facsimile transmission or email in accordance with this Post-Filing Claims Process Order.

30. In the event this Post-Filing Claims Process Order is later amended by further order of the Court, the Monitor shall post such further order on the Monitor's Website and the Monitor shall serve such further order on the Service List and such posting and service shall constitute adequate notice to Post-Filing Claimants or Post-Filing Proven Creditors of the amendments made.

MISCELLANEOUS

31. All Claims of Post-Filing Claimants shall be proven in accordance with the procedures outlined herein and in the Claims Process Instruction Letter. In the event of any discrepancy between this Post-Filing Claims Process Order and the Claims Process Instruction Letter, this Post-Filing Claims Process Order shall govern.

32. Notwithstanding any other provisions of this Post-Filing Claims Process Order, the delivery by the Monitor of any Claims Process Forms contemplated by this Post-Filing Claims Process Order, and the filing by any Person of any Post-Filing Claims Process Forms shall not, for that reason alone, grant any Person standing in these proceedings or rights under any Plan if one is filed.

33. Notwithstanding the terms of this Post-Filing Claims Process Order, the Monitor may apply to this Court from time to time for directions from this Court with respect to this Post-Filing Claims Process Order and the Post-Filing Claims Process or for such further order or orders as the Monitor may consider necessary or desirable to amend, supplement or replace this Post-Filing Claims Process Order, including the schedules to this Post-Filing Claims Process Order.

34. The terms of this Post-Filing Claims Process Order shall be binding on the Monitor in its capacity as Court appointed Receiver of Trevali NB.

35. **THIS COURT REQUESTS** the aid and recognition of other Canadian and foreign courts, tribunal, regulatory or administrative bodies including any court or administrative tribunal of any federal or state court or administrative body in the United States of America, Burkina Faso, and Namibia, to act in aid of and to be complementary to this Court in carrying out the terms of this Post-Filing Claims Process Order where required. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Monitor, as an officer of this Court, as may be necessary or desirable to give effect to this Post-Filing Claims Process Order.

36. Endorsement of this order by counsel appearing on this application, other than counsel for the Monitor, is hereby dispensed with.

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT:

____
Signature of Eamonn Watson
Lawyer for the Monitor

BY THE COURT

____
REGISTRAR

SCHEDULE "A" TO POST-FILING CLAIMS PROCESS ORDER

Counsel Appearing

COUNSEL NAME	PARTY REPRESENTED

SCHEDULE "B" TO POST-FILING CLAIMS PROCESS ORDER

Definitions

1. "**ARIO**" means the order granted in the CCAA Proceedings on August 29, 2022, amending and restating the Initial Order, as such order may be amended and extended from time to time;

2. "**BC BCA**" means the British Columbia *Business Corporations Act*, S.B.C. 2002, C. 57, as amended.

3. "**Business Day**" means any day other than a Saturday, Sunday or a day on which banks in Vancouver, British Columbia, are authorized or obligated by applicable law to close or otherwise are generally closed;

4. "**CCAA**" means the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended;

5. "**CCAA Charges**" means, collectively, the Administration Charge, the D&O Charge, the Intercompany Advances Charge (as such terms are defined in the ARIO), the KERP Charge (as defined in the Key Employee Retention Plan Approval Order granted in the CCAA Proceedings on September 14, 2022), the Sales Agent Charge (as defined in the SISP and Sales Agent Approval Order granted in the CCAA Proceedings on September 14, 2022), and the Interim Lender's Charge (as defined in the Interim Financing Approval Order granted in the CCAA Proceedings on October 11, 2022), and any other charge over the Trevali's assets created by any other order of this Court in the CCAA Proceedings;

6. "**CCAA Proceedings**" means the proceedings commenced by Trevali under the CCAA on the Filing Date in Supreme Court of British Columbia Action No. S-226670, Vancouver Registry;

7. "**Claim**" means any claim or liability arising in whole or in part after the Filing Date, claimed by any Person against Trevali Corp.'s or Trevali NB's Directors or Officers for which any of the Directors or Officers are, by statute or otherwise by law, liable to pay in their capacity as Directors or Officers of Trevali Corp.'s or Trevali NB's and shall, for greater certainty, include any Claim arising through subrogation against any Director or Officer;

8. "**Claims Bar Date**" means 4:00 p.m. (Vancouver time) on November 13, 2026, or such other date as may be ordered by this Court;

9. "**Claims Process Forms**" means the Post-Filing Claims Process Instruction Letter, Post-Filing Claim Form, Notice of Revision or Disallowance, and Notice of Dispute of Revision or Disallowance;

10. "**Court**" means the Supreme Court of British Columbia presiding over these CCAA Proceedings;

11. "**Director**" means any Person who is or was, or may be deemed to be or have been, whether by statute, operation of law or otherwise, a director of Trevali Corp. or Trevali NB;

12. "**Employee**" means any Person who is or was or may be deemed to be or have been, whether by statute, operation of law or otherwise, a current or former employee of Trevali Corp. or Trevali NB whether on a full-time, part-time, or temporary basis, including any individuals on disability leave, parental leave, or other absence;

13. "**EMP Order**" means the order granted in the CCAA Proceedings on June 28, 2023, expanding the Monitor's powers and duties set out in the ARIO;

14. "**Filing Date**" means August 19, 2022;

15. "**includes**" means includes, without limitation, and "**including**" means including, without limitation;

16. "**Initial Order**" means the order of this Court granted on August 19, 2022, in the CCAA Proceedings;

17. "**Lien**" means any mortgage, charge, pledge, assignment by way of security, lien, hypothec, security interest, deemed trust or other encumbrance granted or arising pursuant to a written agreement or statute or otherwise created by law;

18. "**Monitor**" means FTI Consulting Canada Inc. in its capacity as Court-appointed Monitor of Trevali, and not in its personal capacity;

19. "**Monitor's Website**" means the Monitor's website located at http://cfcanada.fticonsulting.com/trevali/;

20. "**Notice of Dispute of Revision or Disallowance**" means the notice substantially in the form attached as **Schedule "F"** to the Post-Filing Claims Process Order that may be delivered by a Post-Filing Claimant who has received a Notice of Revision or Disallowance to dispute such Notice of Revision or Disallowance;

21. "**Notice of Revision or Disallowance**" means the notice substantially in the form attached as **Schedule "E"** to the Post-Filing Claims Process Order that may be delivered by the Monitor to a Post-Filing Claimant advising that the Post-Filing Claimant's Claim has revised or disallowed in whole or in part as set out in its Post-Filing Claim Form;

22. "**Officer**" means any Person who is or was, or may be deemed to be or have been, whether by statute, operation of law or otherwise, an officer of either Trevali Corp. or Trevali NB;

23. "**Person**" means any individual, firm, partnership, joint venture, venture capital fund, association, trust, trustee, executor, administrator, legal personal representative, estate, group, body corporate (including a limited liability company and an unlimited liability company), corporation, unincorporated association or organization, government, governmental or regulatory authority, syndicate, or other entity, whether or not having legal status;

24. "**Plan**" means any plan of arrangement or compromise or distribution under the CCAA or any plan of arrangement under the BC BCA or other corporate statute;

25. "**Post-Filing Claimant**" means any Person, including an Employee, having a Claim and includes, without limitation, the transferee or assignee of a transferred Claim determined in accordance with paragraph 16 of this Post-Filing Claims Process Order, or a trustee, liquidator, receiver, manager, or other Person acting on behalf of such Person;

26. "**Post-Filing Claim Form**" means the form on which a Post-Filing Claimant may set out its Claim, substantially in form attached as **Schedule "D"** to the Post-Filing Claims Process Order;

27. "**Post-Filing Claims Process**" means the determination and adjudication of Claims to be undertaken and administered by the Monitor pursuant to the terms of this Post-Filing Claims Process Order;

28. "**Post-Filing Claims Process Instruction Letter**" means the letter substantially in the form attached as **Schedule "C"** to the Post-Filing Claims Process Order explaining the Post-Filing Claims Process, including how to prove a Claim;

29. "**Post-Filing Claims Process Order**" means the order of this Court made in the CCAA Proceedings on September 29, 2026, establishing the Post-Filing Claims Process to which this **Schedule "B"** is appended;

30. "**Post-Filing Proven Creditor**" means any Post-Filing Claimant that has a Proven Claim;

31. "**Press Release**" means the notice to the public advising of the granting of this Post-Filing Claims Process Order and the initiation of the Post-Filing Claims Process, including the Claims Bar Date, to be published in accordance with paragraph 6 of this Post-Filing Claims Process Order, substantially in form attached as **Schedule "G"** to the Post-Filing Claims Process Order;

32. "**Proven Claim**" means the amount, status and validity of the Claim of a Post-Filing Claimant finally determined in accordance with the Post-Filing Claims Process which shall be final for all purposes, including for voting and distribution purposes, whether under any Plan or otherwise. A Claim becomes a Proven Claim only in accordance with the process set forth in this Post-Filing Claims Process Order; and

33. "**Service List**" means the service list kept by the Monitor in the CCAA Proceedings in accordance with the ARIO and posted on the Monitor's Website.

SCHEDULE "C" TO POST-FILING CLAIMS PROCESS ORDER

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF TREVALI MINING CORPORATION AND TREVALI MINING (NEW BRUNSWICK) LTD.

POST-FILING CLAIMS PROCESS INSTRUCTION LETTER

This Instruction Letter must be read together with the Post-Filing Claims Process Order of the Supreme Court of British Columbia granted on September 29, 2026 (the "**Post-Filing Claims Process Order**"). The Post-Filing Claims Process Order establishes a Post-Filing Claims Process by which Claims against Trevali Corp.'s and Trevali NB's Directors and Officers arising after the Filing Date may be proved.

For greater certainty, only Claims against Trevali's Directors and Officers arising after the Filing Date (August 19, 2022) are subject to this Order and must be submitted to the Monitor.

A copy of the Post-Filing Claims Process Order is available at: http://cfcanada.fticonsulting.com/trevali.

All capitalized terms not otherwise defined in this document have the same meanings as are found in Schedule "B" of the Post-Filing Claims Process Order.

Please note that certain steps you may wish to take with respect to your Claim must be done prior to the Claims Bar Date, which is 4:00 p.m. (Vancouver time) on November 13, 2026. Failure to take certain actions prior to the Claims Bar Date may impact any Claim you may have and can result in a Claim becoming forever barred or extinguished.

If you wish to assert a Claim against a Director or Officer of Trevali Corp. or Trevali NB you must complete and return to the Monitor a completed Post-Filing Claim Form setting forth the amount and status of your alleged Claim. The Post-Filing Claim Form must attach all appropriate documentation evidencing the Claim.

The completed Post-Filing Claim Form must be received by the Monitor by 4:00 p.m. (Vancouver time) on the Claims Bar Date.

The Claims Bar Date is 4:00 p.m. (Vancouver time) on November 13, 2026, or such other date as may be ordered by the court.

If no Post-Filing Claim Form is received by the Monitor by the Claims Bar Date, subject to further Order of the Court, in accordance with the Post-Filing Claims Process Order, any such further Claim(s) against Trevali Corp.'s or Trevali NB's Directors or Officers will be **FOREVER BARRED AND EXTINGUISHED**, and you will be prohibited from making or enforcing any such further Claim(s) against Trevali Corp.'s or Trevali NB's Directors and Officers.

Where a Post-Filing Claim Form is received by the Monitor, the Monitor (and to the extent the Monitor determines appropriate, in consultation with the relevant Director(s) or Officer(s)) will review the Post-Filing Claim Form and, as soon as reasonably practicable, determine whether the Claim set out in the Post-Filing Claim Form is accepted, disputed in whole, or disputed in part.

Where the Claim is disputed in whole or in part, the Monitor will, within 21 Business Days after the Claims Bar Date issue a Notice of Revision or Disallowance to you advising that the Claim as set out in your Post-Filing Claim Form has been revised or disallowed and the reasons therefor.

If you object to a Notice of Revision or Disallowance, you must submit to the Monitor a Notice of Dispute of Revision or Disallowance by prepaid registered mail, email, personal delivery, courier, or facsimile to the Monitor within five Business Days of the date of delivery of the Notice of Revision or Disallowance.

You must also, within 15 Business Days after the date of delivery of the Notice of Revision or Disallowance, file and serve on the Monitor a Notice of Application seeking to appeal the Notice or Revision or Disallowance, along with all supporting affidavit material. The appeal from the Notice of Revision or Disallowance shall proceed as a hearing *de novo*, and the parties may adduce evidence in respect of the Claim not previously included in connection with the applicable Post-Filing Claim Form or in connection with the corresponding Notice of Revision or Disallowance.

All documentation referred to in this Instruction Letter that must be delivered to the Monitor, including a Post-Filing Claim Form or a Notice of Dispute of Revision or Disallowance, and all enquiries or questions regarding the Post-Filing Claims Process, should be addressed to the court-appointed Monitor at:

FTI Consulting Canada Inc.
In its capacity as Monitor of
Trevali Mining Corporation and Trevali Mining (New Brunswick) Ltd.

701 West Georgia Street
Suite 1650, PO Box 10089
Vancouver, BC V7Y 1B6
Attn: Tessa Chiricosta
Telephone: 1-877-294-8998
Fax: 403-232-6116
Email: trevali@fticonsulting.com

Additional information and forms related to the Post-Filing Claims Process can be found on the Monitor's Website or obtained by contacting the Monitor at the address indicated above and providing your contact information including name, address, and e-mail address.

All forms submitted in connection with the Post-Filing Claims Process, including a Post-Filing Claim Form and a Notice of Dispute of Revision or Disallowance, that must be submitted in a currency other than Canadian Dollars will be converted to Canadian Dollars at the applicable Bank of Canada exchange rate published on the Filing Date.

If you are submitting a Post-Filing Claim Form or Notice of Dispute of Revision or Disallowance Form electronically, please submit such form, and any accompanying documentation, at the applicable time in **one** PDF file.

IN ACCORDANCE WITH THE TERMS OF THE POST-FILING CLAIMS PROCESS ORDER, IF YOU FAIL TO FILE A POST-FILING CLAIM FORM BY THE CLAIMS BAR DATE YOUR CLAIM(S) (BEING ANY CLAIMS AGAINST TREVALI CORP.'S OR TREVALI NB'S DIRECTORS AND OFFICERS ARISING AFTER THE FILING DATE) WILL BE FOREVER BARRED AND EXTINGUISHED, AND YOU WILL BE PROHIBITED FROM MAKING OR ENFORCING A CLAIM AGAINST TREVALI CORP.'S OR TREVALI NB'S DIRECTORS AND OFFICERS. ANY FURTHER CLAIMS AGAINST TREVALI CORP.'S OR TREVALI NB'S DIRECTORS OR OFFICERS WILL BE FOREVER BARRED AND EXTINGUISHED, AND YOU WILL BE PROHIBITED FROM MAKING OR ENFORCING ANY SUCH FURTHER CLAIMS AGAINST TREVALI CORP.'S OR TREVALI NB'S DIRECTORS AND OFFICERS.

DATED THE [--] DAY OF [--], 2026 AT THE CITY OF VANCOUVER, IN THE PROVINCE OF BRITISH COLUMBIA

FTI CONSULTING CANADA INC.,
in its capacity as the court-appointed
Monitor of Trevali Mining Corporation and
Trevali Mining (New Brunswick) Ltd.

PER: ______________________________
Tom Powell, Senior Managing Director

SCHEDULE "D" TO POST-FILING CLAIMS PROCESS ORDER

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF TREVALI MINING CORPORATION AND TREVALI MINING (NEW BRUNSWICK) LTD.

POST-FILING CLAIM FORM

This Post-Filing Claim Form must be read together with the Post-Filing Claims Process order (the "**Post-Filing Claims Process Order**") of the Supreme Court of British Columbia granted on September 29, 2026, and the Post-Filing Claims Process Instruction Letter. Copies of the Post-Filing Claims Process Order and the Post-Filing Claims Process Instruction Letter are available at http://cfcanada.fticonsulting.com/trevali. All capitalized terms not otherwise defined herein have the same meanings as are given to them in Schedule "B" of the Post-Filing Claims Process Order.

1. Name(s) and Position(s) and company (Trevali Corp. and/or Trevali NB) of Officer(s) and/or Director(s) the Claim is being made against:

____

____

____

____

____

2A. Original Claimant (the "Claimant")

Legal Name of Claimant:	________________	Name of Contact	________________
Address		Title	________________
________________________		Phone #	________________
________________________		Fax #	________________
City __________	Prov /State ______	Email	________________
Postal/Zip Code ____________			

2B. Has all or part of the Claim been transferred by the Post-Filing Claimant to another party?

Yes: [___]

No: [___]

2C. Particulars of Transferee(s) (If any)

Please complete the following if all or a portion of the Claim has been transferred. Insert full legal name of the transferee(s) of the Claim. If there is more than one transferee, please attach a separate sheet with the required information and any documents evidencing assignment.

Full Legal Name of Transferee:	
Full Mailing Address of Transferee:	
Telephone Number of Transferee:	
Facsimile Number of Transferee:	
E-mail address of Transferee:	
Attention (Contact Person):	

3. Amount and Type of Claim

The Director(s) and/or Officer(s) listed below was/were and still is/are indebted to the Claimant as follows:

NAME(S) OF DIRECTOR(S) AND/OR OFFICERS)	CLAIM AMOUNT

4. Documentation

Provide all particulars of the Claim and all available supporting documentation, including amount and description of transaction(s) or agreement(s), and the legal basis for the Claim against the specific Directors or Officers at issue.

Please note, this Post-Filing Claims Process calls for Claims against Trevali Corp.'s or Trevali NB's Directors and Officers arising after the Filing Date (August 19, 2022) only.

5. Certification

I hereby certify that:

1. I am the Claimant or an authorized representative of the Claimant.
2. I have knowledge of all the circumstances connected with this Claim.
3. The Claimant asserts this Claim as set out above.
4. All available documentation in support of this Claim is attached.

All information submitted in this Post-Filing Claim Form must be true, accurate and complete. Filing a false Post-Filing Claim Form may result in your Claim being disallowed in whole or in part and may result in further penalties.

Signature: ____________ Name: ____________ Title: ____________	Witness[1]: ____________ (signature) ____________ (print)

Dated at ________ this _____ day of ______________, 2023.

Your completed Post-Filing Claims Form must be delivered to the Monitor by the Claims Bar Date at:

FTI Consulting Canada Inc.
In its capacity as Monitor of
Trevali Mining Corporation and
Trevali Mining (New Brunswick) Ltd.

701 West Georgia Street
Suite 1650, PO Box 10089
Vancouver, BC V7Y 1B6
Attn: Tessa Chiricosta
Telephone: 1-877-294-8998
Fax: 403-232-6116
Email: trevali@fticonsulting.com

The Claims Bar Date is 4:00 p.m. (Vancouver time) on November 13, 2026 or such other date as may be ordered by the Court.

[1] Witnesses are required if an individual is submitting this Claim form by prepaid ordinary mail, registered mail, courier, personal delivery, facsimile transmission, or email.

IN ACCORDANCE WITH THE TERMS OF THE POST-FILING CLAIMS PROCESS ORDER, IF YOU FAIL TO COMPLETE AND SUBMIT A POST-FILING CLAIMS FORM IN ACCORDANCE WITH THE POST-FILING CLAIMS PROCESS ORDER BY THE CLAIMS BAR DATE ANY CLAIM (BEING ANY CLAIM AGAINST TREVALI CORP.'S OR TREVALI NB'S DIRECTORS AND OFFICERS ARISING AFTER THE FILING DATE) THAT YOU MAY HAVE AGAINST ANY OF TREVALI CORP.'S OR TREVALI NB'S DIRECTORS OR OFFICERS WILL BE FOREVER BARRED AND EXTINGUISHED, AND YOU WILL BE PROHIBITED FROM MAKING OR ENFORCING ANY FURTHER CLAIMS AGAINST ANY OF TREVALI CORP.'S OR TREVALI NB'S DIRECTORS AND OFFICERS.

SCHEDULE "E" TO POST-FILING CLAIMS PROCESS ORDER

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF TREVALI MINING CORPORATION AND TREVALI MINING (NEW BRUNSWICK) LTD.

NOTICE OF REVISION OR DISALLOWANCE

This Notice of Revision or Disallowance must be read together with the Post-Filing Claims Process Order (the "**Post-Filing Claims Process Order**") of the Supreme Court of British Columbia granted on September 29, 2026. A copy of the Post-Filing Claims Process Order is available at http://cfcanada.fticonsulting.com/trevali. All capitalized terms not otherwise defined herein have the same meanings as are given to them in Schedule "B" to the Post-Filing Claims Process Order.

Full Legal Name of Post-Filing Claimant:

____

Claim Reference Number:______________________________

Pursuant to the Post-Filing Claims Process Order, the Monitor hereby gives you notice that your Post-Filing Claim Form has been reviewed by the Monitor, and that your Claim has been revised or disallowed as follows:

	As Submitted ($CAD)	Revised Claim as Accepted ($CAD)	Secured ($CAD)	Unsecured ($CAD)
Post-Filing Claim Form	[__]	[__]	[__]	[__]

Reason for the Revision or Disallowance:

____
____
____
____
____
____
____
____
____

If you do not agree with this Notice of Revision or Disallowance, please take notice of the following:

To dispute a Notice of Revision or Disallowance you MUST:

(a) Deliver a Notice of Dispute of Revision or Disallowance, a blank copy of which is enclosed in your Claims Package, by prepaid registered mail, personal delivery, e-mail (in pdf format), courier or facsimile transmission to the address indicated herein so that such Notice of Dispute of Revision or Disallowance is received by the Monitor within <u>five</u>

Business Days (before 4:00 p.m.) after the date of delivery of this Notice of Revision or Disallowance, or such other date as may be agreed to by the Monitor; and

(b) File with the Court and serve on the Monitor, a Notice of Application seeking to appeal the Notice of Revision or Disallowance, along with all supporting affidavit material, within 15 Business Days after the delivery of this Notice of Revision or Disallowance, or such other date as may be agreed to by the Monitor, or the Court may order.

Address for service of Notice of Dispute of Revision or Disallowance:

FTI Consulting Canada Inc.
In its capacity as Monitor of
Trevali Mining Corporation and
Trevali Mining (New Brunswick) Ltd.

701 West Georgia Street
Suite 1650, PO Box 10089
Vancouver, BC V7Y 1B6
Attn: Tessa Chiricosta
Telephone: 1-877-294-8998
Fax: 403-232-6116
Email: trevali@fticonsulting.com

IF YOU DO NOT DELIVER A NOTICE OF DISPUTE OF REVISION OR DISALLOWANCE BY THE TIME SPECIFIED, OR DO NOT FILE AND SERVE A NOTICE OF APPLICATION SEEKING TO APPEAL THE NOTICE OF REVISION OR DISALLOWANCE BY THE DATE SPECIFIED, THE NATURE AND AMOUNT OF YOUR CLAIM, IF ANY, SHALL BE AS SET OUT IN THIS NOTICE OF REVISION OR DISALLOWANCE.

Dated the ________ day of ________________, 2026
At the City of Vancouver, British Columbia

FTI CONSULTING CANADA INC.,
in its capacity as the court-appointed
Monitor of Trevali Mining Corporation and
Trevali Mining (New Brunswick) Ltd.

PER: ________________________________
Tom Powell, Senior Managing Director

SCHEDULE "F" TO POST-FILING CLAIMS PROCESS ORDER

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF

TREVALI MINING CORPORATION AND TREVALI MINING (NEW BRUNSWICK) LTD.

NOTICE OF DISPUTE OF REVISION OR DISALLOWANCE

This Notice of Revision or Disallowance must be read together with the Post-Filing Claims Process Order (the "**Post-Filing Claims Process Order**") of the Supreme Court of British Columbia granted on September 29, 2026. A copy of the Post-Filing Claims Process Order is available at http://cfcanada.fticonsulting.com/trevali. All capitalized terms not otherwise defined herein have the same meanings as are given to them in Schedule "B" to the Post-Filing Claims Process Order.

Pursuant to the Post-Filing Claims Process Order, notice is hereby given to you that the undersigned Post-Filing Claimant intends to dispute the Notice of Revision or Disallowance bearing Reference Number ______________ and dated _______________ issued by the Monitor in respect of the below-referenced Claim.

Full Legal Name of Original Post-Filing Claimant: ______________

____

	Claim as Accepted in the Notice of Revision and Disallowance ($CAD)	Amount Claimed ($CAD)	Secured ($CAD)	Unsecured ($CAD)
Post-Filing Claim Form				

Reasons for Dispute: *[attach additional sheet and copies of all supporting documentation if necessary]:*

____

____

____

Signature of Post-Filing Claimant or Representative of Corporate Post-Filing Claimant:___

Date: ____

[Please print name]:____

Telephone Number: (___) __________

Facsimile Number: (___) _________

Email Address: _________________

Full Mailing Address:

____

____

Your complete Notice of Dispute of Revision or Disallowance must be delivered to the Monitor in PDF format within five Business Days (before 4:00 p.m.) after the date of delivery of the Notice of Revision or Disallowance (or such date as agreed to by the Monitor) at the following address:

FTI Consulting Canada Inc.
In its capacity as Monitor of
Trevali Mining Corporation and
Trevali Mining (New Brunswick) Ltd.

701 West Georgia Street
Suite 1650, PO Box 10089
Vancouver, BC V7Y 1B6
Attn: Tessa Chiricosta
Telephone: 1-877-294-8998
Fax: 403-232-6116
Email: trevali@fticonsulting.com

In addition to delivering this Notice of Dispute of Revision or Disallowance to the Monitor you MUST, within 15 Business Days after the date of delivery of the Notice of Revision or Disallowance (or such other date as may be agreed to by the Monitor or ordered by the Court) file and serve on the Monitor, a Notice of Application seeking to appeal the Notice of Revision or Disallowance, along with all supporting affidavit material.

IF YOU DO NOT DELIVER A NOTICE OF DISPUTE OF REVISION OR DISALLOWANCE BY THE TIME SPECIFIED, OR DO NOT FILE AND SERVE A NOTICE OF APPLICATION SEEKING TO APPEAL THE NOTICE OF REVISION OR DISALLOWANCE BY THE DATE SPECIFIED, THE NATURE AND AMOUNT OF YOUR CLAIM, IF ANY, SHALL BE AS SET OUT IN THIS NOTICE OF REVISION OR DISALLOWANCE.

SCHEDULE "G" TO POST-FILING CLAIMS PROCESS ORDER

Press Release

SOLICITATION OF POST-FILING CLAIMS AGAINST TREVALI MINING CORP. AND TREVALI MINING (NEW BRUNSWICK) LTD.'S DIRECTORS AND OFFICERS

On September 29, 2026, the FTI Consulting Canada Inc., the Court-appointed monitor (the "**Monitor**") of Trevali Mining Corporation ("**Trevali Corp.**") and Trevali Mining (New Brunswick) Ltd. ("**Trevali NB**", together with Trevali Corp., "**Trevali**") obtained an order (the "**Post-Filing Claims Process Order**") of the Supreme Court of British Columbia (the "**Court**") pursuant to the *Companies' Creditors Arrangement Act* (Canada) (the "**CCAA**") directing the Monitor, to carry out a "Post-Filing Claims Process" for the solicitation and determination of claims against Trevali Corp.'s and Trevali NB's directors and officers arising after August 19, 2022 (the "**Post-Filing Claims Process**").

A copy of the Claims Process Instruction Letter, the Post-Filing Claims Process Order and other public information concerning the Post-Filing Claims Process and the CCAA Proceedings generally can be found on the Monitor's Website at:

http://cfcanada.fticonsulting.com/trevali/

Any person who may have a claim against any of Trevali Corp.'s or Trevali NB's directors or officers arising after August 19, 2022, should carefully review the Post-Filing Claims Process Instruction Letter and the Post-Filing Claims Process Order.

The Post-Filing Claims Process requires that any person having a claim arising after August 19, 2022, against any of Trevali Corp.'s or Trevali NB's directors or officers must send a "Post-Filing Claim Form" to the Monitor, to be received by the Monitor by no later than 4:00 p.m. (Vancouver time) on **November 13, 2026** (the "**Claims Bar Date**"). **Any Post-Filing Claims that are not received by the Claims Bar Date will be FOREVER BARRED AND EXTINGUISHED**.

All inquires regarding the Post-Filing Claims Process and the CCAA Proceedings should be directed to the Monitor (Tessa Chiricosta) at email: trevali@fticonsulting.com or telephone: 1-877-294-8998.

IN ACCORDANCE WITH THE TERMS OF THE POST-FILING CLAIMS PROCESS ORDER, PERSONS WHO HAVE CLAIMS AGAINST TREVALI CORP.'s OR TREVALI NB'S OFFICERS OR DIRECTORS ARISE AFTER AUGUST 19, 2022, AND WHO DO NOT FILE A POST-FILING CLAIM FORM WITH THE MONITOR BY THE CLAIMS BAR DATE, BEING NOVEMBER 13, 2026, SHALL BE PROHIBITED FROM MAKING OR ENFORCING ANY SUCH CLAIM AND SUCH CLAIMS SHALL BE FOREVER BARRED AND EXTINGUISHED.