

TAX INSTRUCTION LETTER

**FOR FORMER SHAREHOLDERS OF FILO CORP.
WHO ARE ELIGIBLE HOLDERS AND
WISH TO FILE A CANADIAN SECTION 85 ELECTION**

Lundin Mining Corporation and BHP Investments Canada Inc.

Acquisition of the Shares of

Filo Corp.

The Section 85 Election process is time sensitive. Your immediate attention to the matters contained herein is suggested.

The deadline for providing your information to Lundin Mining is on or before March 16, 2025.

TO: Former Shareholders of Filo Corp. who are Eligible Holders in respect of Filo Corp. (the “**Company**” or “**Filo**”) and wish to file a Canadian Section 85 Election

FROM: Lundin Mining Corporation and BHP Investments Canada Inc. (“**Lundin Mining**” and “**BHP**”, respectively and collectively, the “**Purchaser Parties**”)

RE: Plan of Arrangement (the “**Arrangement**”) effective as of January 15, 2025, which provided for the acquisition by Lundin Mining of all of the issued and outstanding common shares of Filo as described in the Notice of Meeting and Management Information Circular for the Special Meeting of Shareholders of Filo Corp. dated August 26, 2024 (the “**Circular**”)

This tax instruction letter is provided to those Eligible Holders (as defined in the Arrangement and page 3 of this tax instruction letter) who wish to make a Section 85 Election (as defined in the Circular) for Canadian federal income tax purposes, in respect of common shares of Filo (“**Filo Shares**” or “**Company Shares**”) disposed of under the Arrangement for consideration that included cash or common shares of Lundin Mining (“**Lundin Mining Shares**”) and cash.

This tax instruction letter outlines how an Eligible Holder may make the Section 85 Election jointly with Lundin Mining. If you are (a) not an Eligible Holder, (b) an Eligible Holder who did not receive any Lundin Mining Shares in respect of your Filo Shares disposed of under the Arrangement, or (c) an Eligible Holder who has decided not to file a Section 85 Election, this tax instruction letter is not relevant to you.

The comments made in this tax instruction letter with respect to the income tax consequences of making a Section 85 Election, if applicable, are of a general nature only and are not intended to be (nor should they be construed to be) legal or tax advice to any particular Eligible Holder. This instruction letter assumes the Eligible Holder reports their Canadian tax results in Canadian dollars. Furthermore, apart from providing this tax instruction letter to Eligible Holders, neither the Purchaser Parties nor the Company will provide Eligible Holders with any advice on making the Section 85 Election.

Accordingly, Eligible Holders should consult with their own tax advisors for specific advice in respect of whether or not to make a Section 85 Election, if applicable, and how to comply with the requirements for making such an election having regard to their own particular circumstances.

Any personal information provided by you to the Purchaser Parties in connection with a Section 85 Election will be used only for the purpose of facilitating the preparation of the Section 85 Election. Your personal information may be disclosed to the Purchaser Parties, the Company, and/or their respective personnel, licensors, representatives, advisors, and service providers. The files containing your personal information will be stored in the offices or on the servers of Lundin Mining, the Company and/or their respective personnel, licensors, representatives, advisors, and service providers who will use commercially reasonable efforts to maintain the confidentiality and security of your personal information. However, there are inherent risks associated with the

transmission of information via mail, internet, fax, or e-mail, and you hereby expressly accept and agree to such risks. **The Company and the Purchaser Parties, or their respective successors, affiliates, advisors, agents, or employees, shall not incur any liability for any loss, damage, cost, expense, or tax arising out of or relating to the transmission, storage, use, or disclosure of your confidential or personal information.**

This tax instruction letter does not provide instructions on completing the Québec provincial equivalent of the federal Section 85 Election form in order to obtain a tax deferral for Québec income tax purposes (the “Québec Election”). Accordingly, Eligible Holders should consult with their own tax advisors for specific advice on this regard.

Eligible Holders should review this tax instruction letter very carefully and should consult their tax advisors as to the proper completion and delivery of the relevant tax election forms to Lundin Mining, and the applicable filing deadlines. Eligible Holders are referred to CRA Information Circular 76-19R3 and CRA Interpretation Bulletin IT-291R3 for further information respecting the Section 85 Election under the *Income Tax Act* (Canada) (the “**Tax Act**”). In addition and if applicable, Eligible Holders are referred to Revenu Québec Interpretation Bulletins IMP.520.1-1/R1, IMP.521.2-1/R1 and IMP.522-1/R1 for information respecting the equivalent election under the *Taxation Act* (Québec) (the “**Québec Act**”). **The comments herein and in the Circular with respect to such elections are provided for general assistance only. The law in this area is complex and contains numerous technical requirements not addressed in this summary.**

Eligible Holders are referred to the Circular and the terms and conditions of the Arrangement. The Arrangement is attached as Schedule A to the arrangement agreement among the Purchaser Parties and Filo dated July 29, 2024 (as amended, supplemented or otherwise modified from time to time, the “**Arrangement Agreement**”), which is available on SEDAR+ (www.sedarplus.ca). Capitalized terms used but not defined in this tax instruction letter have the meanings set out in the Circular. Eligible Holders are encouraged to read the Circular in its entirety.

The Arrangement

Under the Arrangement, holders of Filo Shares (“**Filo Shareholders**”) were permitted to elect to receive, in exchange for any particular Filo Share held:

1. \$33.00 in cash for each Filo Share held (the “**Cash Consideration**”);
2. 2.3578 common shares in the capital of Lundin Mining (each whole common share, a “**Lundin Mining Share**”) for each Filo Share held (the “**Share Consideration**”), plus for each whole Lundin Mining Share issued to such Shareholder, \$0.0001 in cash will also be paid to such Filo Shareholder (the “**Share Consideration Cash**”); or
3. a combination of (1) and (2) in exchange for the aggregate number of Filo Shares in respect of which such election is made.

In each case, the receipt of Cash Consideration, Share Consideration or Share Consideration Cash was subject to a number of terms and conditions, including the proration and fractional share provisions of the Arrangement described below.

The Cash Consideration and Share Consideration are subject, in each case, to pro-ration based on a maximum cash consideration of approximately \$2,767 million and a maximum of approximately 92.1 million Lundin Mining Shares. The Maximum BHP Cash, Maximum Lundin Mining Cash and the Maximum Share Consideration will be adjusted by \$16.50 and \$6.60 in cash and 0.7073 of a Lundin Mining Share, respectively, for each Filo Share issued pursuant to the exercise of Filo Options that are outstanding as of the date of the Arrangement Agreement or pursuant to the exercise of Filo Options issued following the date of the Arrangement Agreement as permitted by the Arrangement Agreement (provided that such Filo Options are exercised on or after the date of the Arrangement Agreement). Filo Shareholders who fail to make a valid election prior to the Election Deadline will be deemed to have elected the Cash Consideration in respect of each Filo Share held, subject to pro-ration.

In the event that the aggregate amount of the Cash Consideration or Share Consideration elected by all Former Company Shareholders exceeds the Maximum Cash Consideration or the Maximum Share Consideration, the Consideration will be pro-rated and Former Company Shareholders will receive the other form of Consideration for the balance of their Filo Shares. The Share Consideration Cash is not included in the determination of the Maximum Cash Consideration. In addition, no Former Company Shareholder shall be permitted to receive Lundin Mining Shares insofar as such Filo Shareholder, either alone or together with its affiliates and other persons acting jointly or in concert with such Filo Shareholder, would, after the receipt of Lundin Mining Shares beneficially own or control greater than 19.99% of the outstanding Lundin Mining Shares, immediately following completion of the Arrangement.

Eligible Holders and the Section 85 Election

An “**Eligible Holder**” is defined in Schedule A to the Arrangement Agreement as a beneficial owner of Company Shares immediately prior to the Effective Time (other than a Dissenting Shareholder) who is: (a) a resident of Canada for purposes of the Tax Act and any applicable income tax treaty (other than a Tax Exempt Person), (b) an Eligible Non-Resident, or (c) a partnership any member of which is described in (a) or (b). A “Tax Exempt Person” is defined in Schedule A to the Arrangement Agreement as a person who is exempt from tax under Part I of the Tax Act. An “Eligible Non-Resident” is defined in Schedule A to the Arrangement Agreement as a beneficial owner of Company Shares immediately prior to the Effective Time (other than a Dissenting Shareholder) who is not, and is not deemed to be, a resident of Canada for the purposes of the Tax Act and any applicable income tax treaty and whose Company Shares are “taxable Canadian property” (as defined in the Tax Act) and not “treaty-protected property” (as defined in the Tax Act).

In order to obtain a full or partial deferral of a gain otherwise realized on the disposition of Filo Shares, an Eligible Holder will be required to make a Section 85 Election under the Tax Act. In the absence of a valid Section 85 Election, for Canadian income tax purposes, an Eligible Holder who exchanges Filo Shares in exchange for cash and Lundin Mining Shares, or cash pursuant to the Arrangement will be considered to have disposed of the Filo Shares for proceeds of disposition

equal to the amount of cash received, or cash and the aggregate fair market value (“**FMV**”) of any Lundin Mining Shares received. As a result, the Filo Shareholder will generally realize a capital gain (or capital loss) to the extent that such proceeds of disposition, net of any reasonable costs of disposition, exceed (or are less than) the adjusted cost base of the Filo Shares immediately before the exchange. The effect and procedure for making a Section 85 Election is set out herein and is generally described under the heading “*Certain Canadian Federal Income Tax Considerations*” in the Circular.

An Eligible Holder who elected to exchange Filo Shares for Share Consideration and Share Consideration Cash is entitled to make a Section 85 Election jointly with Lundin Mining in respect of such Filo Shares, and may thereby defer all or a portion of any gain that might otherwise have arisen on the disposition of such Filo Shares as a consequence of the Arrangement. An Eligible Holder who elected to exchange Filo Shares for Cash Consideration is not entitled to make a Section 85 Election in respect of those Filo Shares for which they did not receive Lundin Mining Shares.

Under the terms of the Arrangement, an Eligible Holder may make a Section 85 Election by providing two signed, correct and complete copies of the necessary joint election form(s) (the “**Tax Election Forms**”) for making the Section 85 Election to Lundin Mining within 60 days after the Effective Date (the “**Tax Election Deadline**”). Lundin Mining, shall, within 60 days after receiving the completed Tax Election Forms from an Eligible Holder, and subject to such Tax Election Forms being correct and complete and in compliance with requirements imposed under the Tax Act (or applicable provincial income tax law), sign and return them to the Eligible Holder. Eligible Holders are solely responsible for timely filing any Tax Election Forms with the Canada Revenue Agency (“**CRA**”) and, if applicable, Revenu Québec.

The Effective Date of the Arrangement was January 15, 2025 and therefore the Tax Election Deadline is March 16, 2025, which is 60 days after the Effective Date.

Making the Section 85 Election is at the discretion of each Eligible Holder and it is the responsibility of each Eligible Holder to consider whether filing the Section 85 Election is in their best interests. Eligible Holders are urged to consult their own tax advisors to determine whether they should make the Section 85 Election and, if applicable, the Québec Election.

Summary of what an Eligible Holder needs to do to file a Section 85 Election

1. Submit two copies of your Tax Election Forms to Lundin Mining in accordance with the procedures set out in this tax instruction letter. Any Tax Election Form must be received on or before the Tax Election Deadline. Send your signed, correct and complete copies of the Tax Election Forms to Lundin Mining at the address below.

Lundin Mining Corporation
1055 Dunsmuir Street, Suite 2800,
Four Bentall Centre
Vancouver, British Columbia
Canada V7X 1L2
Attention: Alicia Qin

2. It is your responsibility to ensure that any Tax Election Form provided is in compliance with the requirements imposed under the Tax Act and corresponding provisions of any applicable provincial tax legislation to make a valid joint election. Lundin Mining will execute and return any signed, correct and completed Tax Election Form received by the Tax Election Deadline to you within 60 days of receipt of such Tax Election Form. If you do not receive a Tax Election Form, it is your responsibility to contact Lundin Mining at S85@lundinmining.com.
3. If you and your tax advisor are satisfied that the Tax Election Forms are accurate and complete, sign and date both copies of the Tax Election Forms in the area marked “Signature of Transferor, Authorized Officer or Authorized Person” at the bottom of page 3 of the federal Tax Election Form T2057 (or on the area marked “Signature of authorized officer of the partnership” on page 4 of form T2058. If you need to request a change to a Tax Election Form that has been executed by Lundin Mining, contact Lundin Mining at S85@lundinmining.com. **Do not make changes to a Tax Election Form that has been executed by Lundin Mining without the written consent of Lundin Mining.**
4. File one copy of each signed Tax Election Form with the relevant tax authority immediately. Page 7 of this tax instruction letter provides details on where to file your Tax Election Forms. Retain the other copy of each Tax Election Form for your records.
5. Report the disposition of your Filo Shares on your tax return for your taxation year in which the disposition took place. The proceeds of disposition should be equal to the “agreed amount” on page 4 of the federal Tax Election Form.
6. Eligible Holders filing in Québec must enclose a copy of their federal Tax Election Form with their Québec Election. Eligible Holders filing in Québec should also note that corporations established in Québec are required to file the French version of the Québec Election; however, the copy of the federal Tax Election Form can be the English version.

We recommend you consult with your tax advisor for specific tax advice in respect of the Section 85 Election (and the Québec Election, if applicable) and related tax matters.

Deadline for Submitting Tax Election Forms to Lundin Mining

The Section 85 Election process is time sensitive. Under the terms of the Arrangement, Lundin Mining is obligated to make a Section 85 Election with an Eligible Holder from whom correct and complete Tax Election Forms are received by Lundin Mining by the Tax Election Deadline. The Tax Election Deadline is 60 days after the Effective Date of the Arrangement.

The Effective Date of the Arrangement was January 15, 2025 and therefore the Tax Election Deadline is March 16, 2025, which is 60 days after the Effective Date.

If the Tax Election Forms for an Eligible Holder are not received by Lundin Mining by the Tax Election Deadline and in accordance with the procedures set out in this tax instruction letter, Lundin Mining will have no obligation to make a Section 85 Election with such Eligible Holder and therefore such Eligible Holder may not benefit from a full or partial deferral

pursuant to the provisions of section 85 of the Tax Act and corresponding provisions of any applicable provincial tax legislation.

Execution and Delivery of a Section 85 Election by Lundin Mining

In order to make a valid Section 85 Election, any Tax Election Forms must be signed and properly completed with the necessary information, including the number of Filo Shares exchanged, the amount of cash (in Canadian dollars) and Lundin Mining Shares received by the Eligible Holder, and the applicable “agreed amount” for the purposes of such election. Lundin Mining will only sign Tax Election Forms for which complete and accurate information has been submitted by an Eligible Holder within the time and manner specified herein. Lundin Mining has no responsibility to verify the information provided. Lundin Mining will not execute Tax Election Forms that do not comply with the provisions of the Tax Act (and if applicable, the Québec Act). In its sole discretion, Lundin Mining or any successor corporation may choose to make a Section 85 Election with an Eligible Holder from whom it receives Tax Election Forms after the Tax Election Deadline, but will have no obligation to do so.

Lundin Mining will return the executed Tax Election Forms to the Eligible Holder at the address provided by the Eligible Holder within 60 days after receipt of such Tax Election Forms.

None of the Company, the Purchaser Parties, Computershare Investor Services Inc. (the “Depositary”) nor any successor corporation will be responsible for the proper completion of any Tax Election Forms except as provided herein. Further, except for Lundin Mining’s obligation to sign and return to you completed Tax Election Forms which it receives on or before the Tax Election Deadline, none of the Company, the Purchaser Parties, the Depositary nor any successor corporation will be responsible for any taxes, interest or penalties arising as a result of the failure of an Eligible Holder to complete and file such Tax Election Forms properly or timely in the form and manner prescribed by the Tax Act and the corresponding provisions of any applicable provincial tax legislation.

Filing a Tax Election Form with the Tax Authorities

Generally, in order for Tax Election Forms to be accepted by the CRA (and, if applicable, Revenu Québec) without an Eligible Holder being liable for a late filing penalty, completed Tax Election Forms must be filed with the CRA (and, if applicable, Revenu Québec) on or before the date that is the earliest of the day by which either Lundin Mining or the Eligible Holder is required to file an income tax return for the taxation year in which the Arrangement occurred (the “**Filing Deadline**”). Lundin Mining’s 2025 taxation year is scheduled to end on December 31, 2025 (although its taxation year could end sooner under the Tax Act as a result of certain events), and it is required to file an income tax return for a particular taxation year six months after such taxation year-end. Each Eligible Holder is urged to consult their tax advisor as soon as possible with respect to the Tax Election Forms and the Eligible Holder’s applicable Filing Deadline. However, regardless of the Eligible Holder’s Filing Deadline, complete and accurate Tax Election Forms must be received by Lundin Mining by the Tax Election Deadline and in accordance with the procedures set out in this tax instruction letter.

The federal Tax Election Form should be filed by the Eligible Holder with the applicable CRA Tax Centre. Information on Tax Centres can be found on the CRA website at: canada.ca/tax-centres.

The Québec Election, together with a copy of the federal Tax Election Form, should be filed by the Eligible Holder at the address which they typically file their Québec income tax returns.

Eligible Holders should consult with their own tax advisors for specific advice in respect of any applicable Filing Deadline in their own particular circumstances.

Completing the Federal Tax Election Form (T2057 or T2058)

Getting Started

Before starting, you will need the following:

1. The applicable federal Tax Election Form. Federal Tax Election Form T2057 should be completed by Eligible Holders who are individuals, corporations and trusts; a copy of the form T2057 is enclosed with this tax instruction letter and the form T2057 can also be obtained at <https://www.canada.ca/en/revenue-agency/services/forms-publications/forms/t2057.html>. Federal Tax Election Form T2058 should be completed by Eligible Holders who are partnerships; a copy of the form T2058 is enclosed with this tax instruction letter, and the form T2058 can also be obtained at: <https://www.canada.ca/en/revenue-agency/services/forms-publications/forms/t2058.html>.
2. Identification related information, including the Eligible Holder's name, address, social insurance number, business number or partnership account number, relevant taxation year and, if applicable, similar information for co-owners of the Filo Shares.
3. The number of Filo Shares the Eligible Holder disposed of pursuant to the Arrangement (the "**Eligible Filo Shares**").
4. The aggregate adjusted cost base of the Eligible Filo Shares.
5. The total amount of cash (in Canadian dollars) and the total number of Lundin Mining Shares received by the Eligible Holder for the Eligible Filo Shares pursuant to the Arrangement.
6. The fair market values of the relevant securities received by and disposed of by Eligible Holders under the Arrangement on the Effective Date.

About the federal Tax Election Forms (T2057 and T2058)

Eligible Holders wishing to make a Section 85 Election with Lundin Mining must complete federal Tax Election Form T2057 or T2058. Eligible Holders that are individuals, corporations or trusts should complete form T2057. Eligible Holders that are partnerships should complete form T2058.

To assist you in understanding the information requirements of each of these forms, the following pages of this tax instruction letter will briefly provide descriptions of the requirements. Forms T2057 and T2058 are substantially similar; therefore, while the instructions below are based on form T2057, they will apply to form T2058 unless otherwise indicated.

The guidance below assumes the Eligible Holder reports their Canadian tax results in Canadian dollars. If an Eligible Holder reports in another currency, the Eligible Holder should consult their tax advisor.

The bolded headings below correspond to portions of forms T2057 and T2058.

Part 1 – Identification

Box 001 – Social Insurance, business or trust account number (on T2058: “Partnership account number

Provide the relevant identification number for the Eligible Holder.

Box 002 – Taxpayer’s name (on T2058: “Name of partnership”)

Enter the legal name of the Eligible Holder (generally, this should be the name listed on the Eligible Holder’s income tax return or information return).

Box 002 – Address and postal code

Provide the address and postal code of the Eligible Holder (generally, this should be the address and postal code listed on the Eligible Holder’s income tax return or information return).

Box 011 and 012 – Tax year of the taxpayer (on T2058: “Tax year of partnership”)

The taxation year that the Eligible Holder must provide is the taxation year that includes the Effective Date of the Arrangement.

1. An individual (other than a trust) is taxed on a calendar year basis and generally has a December 31 taxation year-end. An Eligible Holder that is an individual will generally provide the taxation year as 2025/01/01 to 2025/12/31.
2. A corporation may have a taxation year that ends at any time in the year. An Eligible Holder that is a corporation must provide the taxation year that includes the Effective Date of the Arrangement. For example, if the corporation’s year began on July 1, 2025 and ends on June 30, 2026; the taxation year provided should be 2025/07/01 to 2026/06/30.
3. A trust that is not a graduated rate estate is taxed on a calendar year basis and generally has a December 31 taxation year-end. An Eligible Holder that is a trust (other than a graduated rate estate) that was established on or before January 1, 2025 will generally provide the taxation year as 2025/01/01 to 2025/12/31.
4. A trust that is a “graduated rate estate” (as defined in the Tax Act) may have a taxation year that ends at any time of the year. An Eligible Holder that is a graduated rate estate must provide the taxation year that includes the Effective Date of the Arrangement. For example, if the graduated rate estate trust’s year began on July 1, 2025 and ends on June 30, 2026, the taxation year provided should be 2025/07/01 to 2026/06/30.
5. A partnership with at least one partner that is a corporation may have a taxation year that ends at any time in the calendar year. An Eligible Holder that is a partnership must provide the taxation year that includes the Effective Date of the Arrangement. For example, if the partnership’s year began on July 1, 2025 and ends on June 30, 2026, the taxation year provided should be 2025/07/01 to 2026/06/30.

Box 013 and 014 – Identification information regarding co-owner(s), if any (T2057 only)

If the Eligible Holder owned Filo Shares together with another co-owner or other co-owners, provide the name(s), and social insurance, business or trust account number(s) of the co-owner(s). If the Eligible Holder owned the Filo Shares together with more than one co-owner, the Eligible Holder should attach a schedule to the federal Tax Election Form listing this information.

Box 015 – Corporation’s name (transferee)

The name of the transferee corporation is “Lundin Mining Corporation”.

Address

Lundin Mining’s address is 1055 Dunsmuir Street, Suite 2800, Vancouver, British Columbia, Canada.

Postal code

Lundin Mining’s postal code is V7X 1L2.

Box 016 – Business number

The business number for Lundin Mining is 898434881RC0003.

Box 017 and 018 – Tax year of the corporation

Lundin Mining’s anticipated tax year is 2025/01/01 to 2025/12/31.

Box 019 – Name of the contact person (on T2058: “Name of person to contact for more information”)

Enter the name of any contact person and firm for the Eligible Holder. Please note that none of the Purchaser Parties, the Company or the Depositary will act as the contact person for any Eligible Holder.

Box 022 – Telephone number

Provide the telephone number of the contact person.

Part 2 – Penalty for late-filed and amended elections

This portion of the form is only required if the Eligible Holder is filing their Tax Election Form after their Filing Deadline or if they are filing an amended Section 85 Election. Therefore, Eligible Holders will typically not complete this portion of the form.

Part 3 – Information Required

1. Box 200 – Is there a written agreement relating to this transfer?

The answer to this question is “YES”.

2. Box 201 – Is there a valuation report for the transferred assets (on T2058: “properties”)?

The answer to this question is “NO”.

3. Box 202 – Does a price adjustment clause apply to any of the properties?

The answer to this question is “NO”.

4. Box 203 – Do any persons other than the taxpayer (on T2058: “persons other than members of the partnership”) own or control directly or indirectly any shares of any class of the transferee?

The answer to this question is “YES”.

5. Box 204 – Does a non-arm’s length transfer exist between two or more corporations (on T2058: “rollover exist between the partnership and the corporation”)?

The answer to this question is “NO”.

6. Box 206 – Where shares of a corporation are being transferred, does the transferee own more than 10% of the capital stock of the corporation after the transfer?

The answer to this question is “YES”

7. Box 207 – If the transferor is a non-resident of Canada, are any of the properties transferred taxable Canadian properties (on T2058: “are any partners on-resident of Canada”)?

The answer to this question will be based on the particular circumstances that apply to an Eligible Holder.

The Eligible Holder must determine whether they are resident in Canada or not.

An individual Eligible Holder will generally be resident in Canada if they ordinarily reside in Canada, or if they are in Canada for more than 182 days in the year. An Eligible Holder that is a corporation incorporated in Canada will generally be deemed resident in Canada. An Eligible Holder that is a trust will generally be resident where its trustee(s) is resident. Eligible Holders who are also resident in another country may or may not be resident in Canada depending on their particular circumstances and the tax treaty (if any) between Canada and that other country.

Refer to the Circular on the definition of “taxable Canadian property” as defined in the Tax Act.

Eligible Holders who may hold shares as “taxable Canadian property” should consult their own tax advisors in this regard.

Box 216, 217 and 218 – Where shares of the capital stock of a private corporation are included in the property disposed of, provide the following:

The Filo Shares were not shares of a “private corporation”, because Filo was a “public corporation”. Therefore, this portion of the form should not be completed.

Part 4 - Description of shares received

Box 250 - Number of shares transferor received

Eligible Holders must indicate how many Lundin Mining Shares they received under the Arrangement.

Please refer to “**Appendix A: Example: Calculation of Consideration for Share Election Shares**”

Box 251 – Class of shares

Eligible Holders received “common” shares of Lundin Mining. Select “Yes”.

Box 253 – Redemption value per share

The Lundin Mining Shares received by Eligible Holders do not have a redemption value. Eligible Holders should therefore not complete this portion of the form.

Box 254 – Paid-up capital

To include “Per subsection 85(2.1) of the Tax Act”.

Box 255 and 256 – Voting or non-voting

The Lundin Mining Shares Eligible Holders received are “voting” shares.

Box 257 – Are the shares redeemable at the holder’s option?

The Lundin Mining Shares received by Eligible Holders are not redeemable at the Eligible Holder’s option; Eligible Holders should therefore check the box marked “NO”.

Part 5 – Election and certification (T2057 only)

Eligible Holders must sign the form T2057 on the line above “Signature of Transferor, Authorized Officer or Authorized Person” at the bottom of page 3 of form T2057. Eligible Holders completing form T2058 will sign on page 4 of form T2058 (see “*Election and certification (T2058 only)*” below).

Schedule A – Information on the property disposed of and consideration received

Eligible Holders are required to input information about the Filo Shares in respect of which they are making an election into this portion of the form.

Eligible Holders are reminded that they are not permitted to make a Section 85 Election in respect of Filo Shares for which they did not receive any Lundin Mining Shares.

Eligible Holders who held their Eligible Filo Shares as capital property should input the information discussed below (except the date of transfer) in the row labelled “Capital property (shares only)”; Eligible Holders who did not hold their Eligible Filo Shares as capital property should input this information in the row labelled “Inventory excluding real property”.

Box 500 – Date of sale or transfer of all properties listed below

Eligible Holders should fill in January 15, 2025, the Effective Date of the Arrangement, in this portion of the form.

Box 520 – Number and Class of Shares

Eligible Holders should indicate the number and class of Eligible Filo Shares which they transferred to Lundin Mining under the Arrangement. For example, an Eligible Holder that disposed of 1,000 Eligible Filo Shares to Lundin Mining that wishes to make a Section 85 Election in respect of all 1,000 Eligible Filo Shares would fill in “1,000 common shares of Filo Corp.”

Box 521 – Elected amount limits

The elected amount is subject to the following limitations by the Tax Act, and may not be:

- less than the aggregate amount of the cash received by the Eligible Holder on the exchange;
- less than the lesser of (i) the Eligible Holder’s adjusted cost base of the Filo Shares immediately before the time of the exchange, and (ii) the fair market value of the Filo Shares, at the time of the exchange; or
- greater than the fair market value of the Filo Shares at the time of the exchange.

Eligible Holders should input the aggregate fair market value of the Eligible Filo Shares they disposed of to Lundin Mining under the Arrangement in Box 521 in the column labelled “Fair market value of the disposed property” under the “Elected Amount Limits” column.

Please refer to “**Appendix A: Example: Calculation of Consideration for Share Election Shares**” for an illustrative example.

Box 522 – Elected amount limits

The elected amount is subject to the limitations by the Tax Act stipulated above. Eligible Holders should input their adjusted cost base in respect of their Eligible Filo Shares (or cost amount if such shares are not capital property) in Box 522 in the column labelled “Cost Amount” under the “Elected Amount Limits” column.

Generally speaking, an Eligible Holder's adjusted cost base of their Eligible Filo Shares will be the amount that they paid for the Eligible Filo Shares plus any reasonable costs to acquire the shares. The rules governing adjustments to the adjusted cost base of shares are complex, and Eligible Holders should consult their tax advisors with respect to the amount to specify in Box 522.

Box 523 – Agreed amount

The agreed amount (a.k.a. the elected amount) is subject to the limits discussed above under Box 521 "*Information on the eligible property disposed of and consideration received – Elected amount limits*".

The agreed amount will become the Eligible Holder's proceeds of disposition for their Eligible Filo Shares. Subject to the limits discussed above, an Eligible Holder who wishes to defer the entire portion of any gain arising on the disposition of their Eligible Filo Shares should input an agreed amount equal to Eligible Holder's adjusted cost base (or cost amount if such shares are not capital property) of their Eligible Filo Shares.

Some Eligible Holders may wish to realize all, or some portion of the capital gain arising on the disposition of their Eligible Filo Shares in order to, for example, utilize capital losses which they have incurred. This can be achieved by inputting an agreed amount that is (subject to the limits discussed above) more than their adjusted cost base (or cost amount if such shares are not capital property) of their Eligible Filo Shares.

Box 524 – Amount to be reported

Eligible Holders should fill in Box 524 with an amount that is equal to their agreed amount in Box 523 less their amount in Box 522. This amount is the amount of the gain (if any) that the Eligible Holder will realize on the disposition of their Eligible Filo Shares.

Box 525 – Description of Consideration Received (Non-Share)

Eligible Holders should indicate in Box 525 that they received cash in exchange for their Eligible Filo Shares.

Box 526 – FMV of Consideration Received (Non-Share)

Eligible Holders should input the aggregate amount of the cash payment received, including the Cash Consideration and/or the Share Consideration Cash, that they received in exchange for their Eligible Filo Shares.

In general, for purposes of the Tax Act, all amounts relating to the acquisition, holding or disposition of Filo Shares of Lundin Mining Shares must be expressed in Canadian dollars based on the exchange rates as determined in accordance with the Tax Act.

Box 527 – Number and Class of Share Consideration Received

Eligible Holders should input the number and class of shares of Lundin Mining they received in exchange for their Eligible Filo Shares under the Arrangement. For example, if an Eligible Holder received 1,000 Lundin Mining Shares, they would input “1,000 common shares of Lundin Mining Corporation” in this column.

Box 528 – FMV of Share Consideration Received

Eligible Holders should input the aggregate fair market value of the Lundin Mining Shares they received under the Arrangement. Lundin Mining estimates the fair market value of each Lundin Mining Share exchanged under the Arrangement was CA\$12.22.

Box 529 – Total FMV of the Consideration Received

Eligible Holders should input in Box 529 the sum of amounts in Box 526 and Box 528

Totals

Please ensure the amounts for Box 521 “Fair market value of the of the disposed property”, Box 523 “Agreed amount”, Box 526 “FMV of consideration received (non-share)”, Box 528 “FMV of share consideration received”, and Box 529 “Total FMV of the consideration received” is entered again in the row under “Totals” at the bottom of page 6 of form T2057.

Election and certification (T2058 only)

The “Election and certification” portion of form T2058 must be signed by all members of the partnership, or by a person authorized in writing by all partners to sign the form on their behalf. If the form is signed by one partner who is authorized on behalf of all the other partners, a copy of the authorizing agreement must be attached to the form.

Additional instructions regarding the execution of form T2058 are found on page 4 of form T2058.

Frequently Asked Questions

Am I entitled to make a Section 85 Election for all my Filo Shares?

You may make a Section 85 Election in respect of every Filo Share for which you elected to receive cash and Share Consideration. If you disposed of a Filo Share for which you elected to receive Cash Consideration, you are not permitted to make a Section 85 Election in respect of that Filo Share.

Where should I send my Tax Election Forms to be executed by Lundin Mining?

Send your signed, correct and complete copies of the Tax Election Forms to Lundin Mining at:

Lundin Mining Corporation.
1055 Dunsmuir Street, Suite 2800
Four Bentall Centre
Vancouver, BC
Canada V7X 1L2
Attention: Alicia Qin

How do I confirm the number of Lundin Mining Shares and cash I received pursuant to the Arrangement?

Your securities broker may be able to provide you with this information. Alternatively, this information should be on your brokerage statement for the period that includes the Effective Date of the Arrangement.

What happens if I was entitled to a fraction of a Lundin Mining Share?

No fractional Lundin Mining Shares shall be issued. The number of Lundin Mining Shares to be issued shall be rounded up to the nearest whole Lundin Mining Share in the event you are entitled to a fractional share of 0.5 or more of a Lundin Mining Share and shall be rounded down to the nearest whole Lundin Mining Share, as applicable, in the event that you are entitled to a fractional share representing less than 0.5 of a Lundin Mining Share.

How do I determine how many Filo Shares were disposed of pursuant to the Arrangement?

You disposed of all your Filo Shares to Lundin Mining pursuant to the Arrangement unless you were a Dissenting Shareholder. Your securities broker may be able to confirm the number of Filo Shares you disposed of. Alternatively, this information should be on your brokerage statement for the period that includes the Effective Date of the Arrangement.

Is there a fee for making the Section 85 Election?

No, you are not required to pay any government fees to make a Section 85 Election, provided the applicable Tax Election Forms are filed by your Filing Deadline. If you file the Tax Election Form after your Filing Deadline, CRA may levy a late-filing penalty, and you must include payment for the estimated late filed-filing penalty when you file the Tax Election Forms.

How do I calculate the adjusted cost base of my Filo Shares?

The adjusted cost base of an Eligible Holder's Filo Shares that are capital property will generally be the amount that the Eligible Holder paid for the Filo Shares when they were originally acquired plus reasonable costs to acquire the shares, such as a broker commission. The cost of particular Filo Shares may be different due to certain events (e.g., where a shareholder received their Filo Shares in a tax-deferred transaction or by way of a gift). The adjusted cost base of an Eligible Holder's Filo Shares acquired at any time will be determined by averaging the cost of such shares with the adjusted cost base of the Filo Shares held by the Eligible Holder as capital property immediately before that time.

The rules for determining the adjusted cost base are complex. You should consult your own tax advisor to obtain assistance.

I acquired my Filo Shares from my spouse or common law partner. What is my adjusted cost base?

If you acquired your Filo Shares from your spouse or common law partner, the tax rules are complex and you should consult your tax advisor for more information.

What happens if Lundin Mining does not receive my Tax Election Form by the Tax Election Deadline?

Lundin Mining has agreed to make Section 85 Elections with Eligible Holders only if complete and accurate Tax Election Forms are provided to Lundin Mining on or before the Tax Election Deadline, so it is important to provide your complete and accurate Tax Election Forms by that deadline. Lundin Mining may, but is not obligated to, make Section 85 Elections if the Tax Election Forms are received after the Tax Election Deadline. Consequently, you should ensure that your complete and accurate Tax Election Forms are received by Lundin Mining in accordance with the procedures set out above by the Tax Election Deadline. Accordingly, if you wish to make a Section 85 Election with Lundin Mining, you should give your immediate attention to this matter.

I filed the Section 85 Election to obtain a full tax-deferred rollover on the disposition of my Eligible Filo Shares. Do I have to report the disposition on my tax return for the period that includes the disposition of the Eligible Filo Shares?

Yes. You must report the disposition of Filo Shares even though you elected to obtain a full deferral of any capital gain that might otherwise have arisen on the disposition of your Filo Shares under the Arrangement. An Eligible Holder's proceeds of disposition for Canadian income tax purposes will be equal to the agreed amount set out on Box 523 on page 4 of the federal Tax Election Form. If applicable, it must also be reported on a Québec tax return for provincial purposes.

What if I have elected to report my Canadian tax results in a currency other than the Canadian dollar?

Consult your tax advisor for assistance on how to complete monetary amounts in any Tax Election Forms.

Is the Eligible Holder a resident of Québec or required to file a Québec provincial income tax return?

The rules for determining Québec residency are complex and vary depending on an Eligible Holder's specific circumstances.

An Eligible Holder who is required to file a Québec income tax return is also required to file the Québec Election form in order to obtain a tax deferral for Québec income tax purposes.

Such Eligible Holders should consult with their own tax advisors for specific advice in this regard.