

AlixPartners

July 8, 2026

**Second Report of
AlixPartners Restructuring,
Inc.
as Proposal Trustee of
999 Gold Depot (Canada)
Limited**

and

**Pre-filing Report of
AlixPartners Restructuring,
Inc.
as Proposed Monitor of
999 Gold Depot (Canada)
Limited**

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ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

Court No.: 31-3367471

Estate No.: 31-3367471

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF
999 GOLD DEPOT (CANADA) LIMITED

SECOND REPORT OF ALIXPARTNERS RESTRUCTURING, INC.
AS PROPOSAL TRUSTEE

July 8, 2026

1.0 Introduction

1. On April 30, 2026, 999 Gold Depot (Canada) Limited (the "**Company**") filed a Notice of Intention to Make a Proposal (the "**NOI**") in accordance with the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended (the "**BIA**"), and AlixPartners Restructuring, Inc. ("**AlixPartners**")¹ consented to act as proposal trustee (in such capacity, the "**Proposal Trustee**"). A copy of the certificate of filing issued by the Office of the Superintendent of Bankruptcy in respect of the NOI Proceedings is attached as **Appendix "A"**.
2. On May 28, 2026, the Ontario Superior Court of Justice (Commercial List) issued an order (the "**Extension Order**"), which, among other things, extended the deadline for the Company to file a proposal. The Extension Order provided an additional 45 days for the Company to file a proposal, extending the deadline to July 14, 2026.
3. The principal purpose of the Company's proceedings under the BIA (the "**NOI Proceedings**") has been to create a stabilized environment in which the Company can preserve enterprise value, continue operating as a going concern, and evaluate restructuring alternatives arising from certain tax assessments and enforcement activity from the Canada Revenue Agency (the "**CRA**"), as discussed below.
4. AlixPartners is filing this report (the "**Joint Report**") in its capacities as: (i) the Proposal Trustee in connection with the NOI Proceedings; and (ii) proposed monitor (the "**Proposed Monitor**") in the Company's proceedings under the *Companies' Creditors Arrangement Act* ("**CCAA**") (the "**CCAA Proceedings**").

¹ Effective June 1, 2026, AlixPartners Restructuring, Inc. was substituted in place of KSV Restructuring Inc. as Court Officer in the NOI Proceedings pursuant to an order dated June 3, 2026 issued by the Ontario Superior Court of Justice (Commercial List). The professionals involved in this mandate from the outset remain unchanged.

5. The First Report of the Proposal Trustee dated May 25, 2026 (the "**First Report**") and the Affidavit of Erol Aksu, affirmed July 7, 2026 in support of the CCAA application (the "**Aksu Affidavit**"), provide, *inter alia*, further background information concerning the NOI Proceedings and proposed CCAA Proceedings. A copy of the First Report (without appendices) is provided as **Appendix "B"**.
6. The Court materials filed in the NOI Proceedings and the CCAA Proceedings are available on AlixPartners' case website at www.ksvadvisory.com/experience/case/golddepot (the "**Case Website**"). If the Court sees fit to grant the initial order sought by the Company in the CCAA Proceedings, the Case Website will be maintained by the Proposed Monitor, in its capacity as Court-appointed monitor, going forward.

1.1 Purposes of this Report

1. The purposes of this Joint Report are to:
 - a) provide background information about the Company;
 - b) discuss the rationale for continuing the NOI Proceedings under the CCAA in accordance with Section 11.6 of the CCAA;
 - c) provide AlixPartners' qualifications to act as monitor, should the Court see fit to appoint it as such (in such capacity, the "**Monitor**");
 - d) report on the Company's cash flow projection for the period July 13, 2026 to November 14, 2026 (the "**Cash Flow Forecast**");
 - e) discuss the rationale for including the following provisions in the Initial Order:
 - i. a stay of proceedings until November 14, 2026, including a stay of set-off;
 - ii. a charge in the amount of \$500,000 (the "**Administration Charge**") on the Company's current and future property, assets and undertaking (collectively, the "**Property**") to secure the fees and disbursements of the Company's insolvency counsel, Chaitons LLP, the Company's tax counsel, Alepin Gauthier Avocats Inc. (the "**Tax Counsel**"), the Monitor, and the Monitor's counsel, Blake, Cassels & Graydon LLP;
 - iii. a charge in the amount of \$165,000 (the "**Directors Charge**") on the Property in favour of the directors and officers of the Company (the "**Directors and Officers**"); and
 - iv. the proposed priority of the Charges in the Initial Order; and
 - f) provide the Proposed Monitor's recommendation regarding the relief sought by the Company in its CCAA application materials.

1.2 Restrictions

1. In preparing this Joint Report, AlixPartners has relied upon the Company's unaudited financial information, the Company's books and records, and discussions with the Company's representatives and legal counsel.
2. AlixPartners has not audited or otherwise attempted to verify the accuracy or completeness of the financial information relied on to prepare this Joint Report in a manner that complies with Canadian Auditing Standards ("**CAS**") pursuant to the Chartered Professional Accountants of Canada Handbook and, accordingly, AlixPartners expresses no opinion or other form of assurance contemplated under the CAS in respect of such information. Any party wishing to place reliance on the financial information should perform its own diligence.
3. An examination of the Cash Flow Forecast as outlined in the Chartered Professional Accountants of Canada Handbook has not been performed. Future oriented financial information relied upon in this Joint Report is based on the Company's assumptions regarding future events; actual results achieved may vary from this information and these variations may be material. AlixPartners expresses no opinion or other form of assurance on whether the Cash Flow Forecast will be achieved.

1.3 Currency

1. Unless otherwise noted, all currency references in this Joint Report are in Canadian Dollars.

2.0 Background

1. A detailed background on the Company, its operations, financial status and ongoing tax dispute can be found in the Aksu Affidavit. This Joint Report will not substantially repeat the information in that affidavit. Readers are encouraged to review the Aksu Affidavit prior to this Joint Report.
2. The Company is an Ontario corporation operating a precious metals business engaged primarily in the purchase of scrap precious metals, which the Company refines with the assistance of third-party refiners in Canada and the United States. Once the materials have been refined into bullion form, the Company sells the refined precious metals to its customers, primarily investors and jewellers.
3. The Company operates from a leased facility of approximately 780 square feet. The premises include a dedicated customer area, two customer booths, a melt room equipped with two induction furnaces and two x-ray assay machines, secure storage, scales, computers and related operational equipment.
4. The Company currently employs five individuals. There are four full-time employees and one part-time employee.

5. The Company's business model historically generated recurring GST/HST refunds as a result of paying GST/HST on purchases of scrap precious metals while making sales of refined investment-grade gold that were frequently zero-rated or exempt for GST/HST purposes.
6. The CRA reassessed the Company for GST/HST reporting periods from April 1, 2013 to August 31, 2019 by denying approximately \$15.7 million in input tax credits, together with penalties and interest (the "**CRA Assessment**"). Additional information related to the Company's operations and the CRA Assessment is set out in the First Report and the Aksu Affidavit.

2.1 Continuation of NOI Proceedings as CCAA Proceedings

1. The NOI Proceedings for the Company were commenced on an urgent basis due to CRA enforcement measures, including a Requirement to Pay dated April 22, 2026 (the "**April RTP**") sent to the Canadian Imperial Bank of Commerce where the Company maintained its sole operating account. As a result of the April RTP, the Company lost access to its operating funds, which materially disrupted its ability to continue operations. The NOI filing was thus necessary to maintain operations in the immediate term.
2. Since the NOI filing, the Company has operated in the ordinary course while advancing the CRA Litigation (as defined below). The Company's intention since filing the NOI has been to take up and continue the NOI Proceedings as a proceeding under the CCAA for among the following reasons:
 - a) the Company's current stay of proceedings in the NOI Proceedings expires on July 14, 2026. Given that the CRA Litigation remains outstanding and the quantum of the CRA's claim will not be determined before that date, the Company is not in a position to formulate and file a viable proposal within the current Filing Period (or any filing period, as the Proposal Trustee notes that the maximum period of time between filing the NOI and filing a proposal under the BIA is six months,² and the CRA Litigation will not be resolved within that short of time); and
 - b) absent the relief sought, the expiry of the stay on July 14, 2026 would result in the Company being deemed to have made an assignment in bankruptcy.
3. A proposal process under the BIA therefore does not offer the Company a viable path to a successful restructuring.

² See BIA s. 50.4(9).

4. The central issue underlying the Company's insolvency is the validity of the CRA Assessment, which the Company disputes and is actively contesting through its appeal in the Tax Court of Canada (the "**CRA Litigation**"). The CCAA provides a more appropriate and flexible forum within which the Company can continue to advance the CRA Litigation while benefiting from a stay of proceedings and maintaining ordinary-course operations.
5. The determination of the CRA Litigation will inform the quantum of the CRA's claim and, in turn, the shape of any viable restructuring or plan of arrangement.
6. For these reasons, the Company is of the view that continuing the NOI Proceedings under the CCAA is in the best interests of the Company and its stakeholders and represents the most appropriate means of maximizing recoveries and preserving the Company's business as a going concern pending resolution of the CRA Litigation.
7. The Proposal Trustee and Proposed Monitor agree with the Company's analysis in this regard: the NOI Proceedings were necessary to commence on an emergency basis, but they do not provide the Company with sufficient time to resolve the CRA Litigation and develop a restructuring plan. The CCAA Proceedings would provide the Company with that opportunity.

2.2 AlixPartners Qualification to Act as Monitor

1. Should the Court approve the continuation of the NOI Proceedings under the CCAA, the proposed Initial Order contemplates that AlixPartners would be appointed as Monitor in the CCAA Proceedings. AlixPartners' qualifications to act as the Monitor are summarized below:
 - a) AlixPartners is a licensed trustee within the meaning of subsection 2(1) of the BIA. AlixPartners is not subject to any of the restrictions set out in Section 11.7(2) of the CCAA with respect to its appointment as the Monitor;
 - b) AlixPartners has extensive experience acting as CCAA monitor and in other court officer capacities in various insolvency proceedings, including in the precious metals industry;
 - c) AlixPartners has consented to act as Monitor in the proposed CCAA Proceedings should the Court grant the Initial Order; and
 - d) as AlixPartners is presently the Proposal Trustee, it has developed a detailed understanding of the Company and its operations, while maintaining the objective distance of a Court officer; it is accordingly reasonable and efficient for AlixPartners to be appointed as the Monitor.

2. Since the filing of the NOI, AlixPartners has assisted the Company in preparing for the NOI Proceedings and the commencement of the CCAA Proceedings, including reviewing and advising on the proposed Initial Order and cash flow projections, and consulting with the Company on these matters. Through this engagement, AlixPartners has developed an understanding of the Company's financial challenges and restructuring objectives.

2.3 Cash Flow Forecast

1. The Company has prepared the Cash Flow Forecast for the period July 13, 2026 to November 14, 2026 (the "**Period**"). The Cash Flow Forecast and the Company's statutory representations on the cash flow pursuant to Section 10(2)(b) of the CCAA are attached as **Appendix "C"**.

(unaudited; CAD; \$000s)	July 10, 2026 – November 14, 2026
Receipts	\$12,992
Disbursements	
Payroll	210
Materials	12,500
Rent	18
HST Paid	245
Professional Fees	300
Operating Expenses	143
Contingency	76
	13,492
Net Cash Flow	(500)
Opening Cash Balance	1,057
Net Cash Flow	(500)
Closing Cash Balance	557

2. The Cash Flow Forecast indicates that the Company will have sufficient liquidity to fund operations during the Period, including professional fees.
3. Based on AlixPartners' review of the Cash Flow Forecast, the assumptions appear reasonable. AlixPartners' statutory report on the Cash Flow Forecast, filed as Proposed Monitor, is attached as **Appendix "D"**.

2.4 Length of Stay of Proceedings

1. The Proposed Initial Order seeks a stay of proceedings up to and including November 14, 2026. This is atypical of an initial order under the CCAA, which usually provide for a stay of proceedings of only 10 days, pursuant to s. 11.02(1)(a) of the CCAA.

2. The Proposal Trustee and Proposed Monitor notes that the facts of this application are unusual. By virtue of the NOI Proceedings, the Company's stakeholders (including in particular the CRA) have been subject to a stay of proceedings, and the Company's insolvency proceedings generally, since April 30, or over two months. The conversion of the NOI Proceedings into the CCAA Proceedings would not be a material change in the status quo, and so in the Proposal Trustee's and Proposed Monitor's view, the policy rationales for requiring a 10 day "comeback" are not applicable to the present facts: stakeholders have not been taken by surprise by the CCAA application.
3. Moreover, given the nature of the Company's business and the root cause of its insolvency (being the CRA Assessment), nothing is expected to develop urgently in the CCAA Proceedings. It is anticipated that the CRA Litigation will play out while the Company maintains its operations as closely as possible to business-as-usual, under the protection of the stay of proceedings and under the supervision of the Monitor and ultimately the Court. Requiring the Company to come back to Court in 10 days just to seek an extension of the stay of proceedings would be an inefficient use of the Court's time and the Company's limited resources.
4. The proposed Initial Order also includes the usual comeback language, permitting any interested party to return to Court on seven days notice to seek to have the Initial Order varied or amended. Such interested parties are therefore protected, without needing to impose an otherwise unnecessary 10 day comeback hearing.
5. The Proposal Trustee and Proposed Monitor are aware of at least three cases where the Ontario Superior Court did not require a 10 day comeback on an application to continue an NOI proceeding under the CCAA,³ where it was satisfied that affected parties were sufficiently on notice, and a 10 day comeback would be inefficient.

2.5 Scope of Stay of Proceedings

1. In addition to the stay of proceeding and restriction on the exercise of remedies language in the CCAA model initial order, the proposed Initial Order includes a prohibition on any set-off of pre-filing obligations against post-filing obligations. This includes with respect to input tax credits ("**ITCs**") that may be payable by the CRA to the Company post-filing.

³ *In the Matter of The Body Shop Canada Limited*, 2024 ONSC 3882 (Ont. SCJ [Commercial List] – Justice Osborne), *In the Matter of a Plan of Compromise or Arrangement of Joriki Topco Inc. and Joriki Inc.*, 2025 ONSC 704 (Ont. SCJ [Commercial List] – Justice Osborne) and *Iovate Health Sciences International Inc., et al.* [Unreported](#) (Ont. SCJ [Commercial List] – Justice Dietrich).

2. In the view of the Proposal Trustee and Proposed Monitor, given the nature of the Company's revenue model, this pre- against post-filing set-off restriction is necessary to maintain the Company's operations, and consistent with the discretionary treatment of set-off in the prevailing case law on the issue.⁴
3. While the Proposal Trustee and Proposed Monitor is not aware of any precedent for ITCs to be specifically referenced in a provision of an initial order related to set-off, the principles underlying the Court's decision to prohibit set-off in other cases are applicable to CRA debts and obligations, such that in the present case, the Proposal Trustee and Proposed Monitor is satisfied that the requested prohibition on set-off is not unreasonable.

2.6 Recommendation

1. AlixPartners recommends that the Court issue the Initial Order, including an order continuing the NOI Proceedings under the CCAA and granting the requested stay of proceedings, for the following reasons:
 - a) AlixPartners is of the view that the Company and its management are acting in good faith and with due diligence;
 - b) although the April RTP has been withdrawn by the CRA, absent a stay of proceedings the CRA may continue enforcement actions, and the Company would be unable to continue operating its business should its cash become frozen again;
 - c) compared to the NOI Proceedings, a CCAA process provides a better insolvency-proceeding framework for the continuation of the CRA Litigation in the Tax Court of Canada, including because the timelines under the CCAA are considerably more flexible than those under the BIA;
 - d) as the CRA's claim cannot be quantified pending the outcome of the ongoing tax litigation, and because the CRA is by far the Company's largest creditor, the Company would be unable to formulate a proposal acceptable to its creditors in the time provided to it under the BIA;
 - e) the Cash Flow Forecast reflects that the Company has sufficient liquidity to continue to operate during the Period; and
 - f) AlixPartners is not aware of any prejudice to stakeholders that would be created by continuing the NOI Proceedings as CCAA Proceedings.

⁴ For example, *Montréal (City) v. Deloitte Restructuring Inc.*, 2021 SCC 53

3.0 Court Ordered Charges

3.1 Administration Charge

1. The Company is seeking Court approval of an Administration Charge in an initial amount not to exceed \$500,000 to secure the fees and expenses of the Monitor, its legal counsel, the Applicant's insolvency counsel, and the Tax Counsel.
2. The Administration Charge is a customary provision in an initial order in a CCAA proceeding; it is required to provide security to the professionals engaged to assist a debtor company and to protect them if the debtor is unable to pay professional fees and costs during the CCAA process.
3. The Company has worked with AlixPartners to estimate the proposed quantum of the Administration Charge.
4. AlixPartners believes that the Administration Charge is reasonable and appropriate in the circumstances given the complexities of the Company's proceedings. The professionals require the benefit of the Administration Charge to protect them for their fees and costs that will be incurred during these proceedings. Without such protection, the professionals are unlikely to be prepared to continue to provide services in these proceedings.

3.2 Directors' Charge

1. The Company is seeking Court approval of a Directors' Charge in a total amount of \$165,000. The amount of the Directors' Charge was estimated by the Company, in consultation with the Proposed Monitor, taking into consideration the potential exposure of the Directors and Officers for post-filing accrued vacation pay, unpaid wages, unremitted HST and payroll source deductions until the end of the Period.
2. AlixPartners understands that the Company is current on its normal course GST/PST/HST and payroll obligations. Accordingly, the amount of the Directors' Charge represents the sum of:
 - a. two payroll cycles⁵ for the employees (inclusive of source deductions) (approximately \$38,000);
 - b. the estimated amount of the Company's vacation pay that may accrue over the Period (approximately \$10,000); and
 - c. two times the average of the Company's last twelve months of HST remittances paid to the CRA (approximately \$115,000).
3. The foregoing amounts total approximately \$163,000 and accordingly, the Company is seeking a Directors' Charge rounded to \$165,000.

⁵ Represents one bi-weekly pay periods, plus an additional period as payroll is paid two weeks in arrears.

4. The proposed Directors' Charge is being sought as security for the indemnity provided for in the Initial Order in favour of the Company's sole Director in connection with any obligations or liabilities that he may incur as a director of the Company after the commencement of these CCAA proceedings.
5. AlixPartners believes the Directors' Charge is reasonable given that the expertise offered by the sole director of the Company is critical to the overall success of these proceedings, and due to the fact that the Company does not maintain director's and officer's liability insurance. AlixPartners understands that the sole director is not prepared to be personally liable for the Company's obligations, and accordingly, without the benefit of the Directors' Charge, the continued service of the director would be at risk.

4.0 Cash Management System

1. The Company's cash management system (the "**Cash Management System**") is detailed in the Aksu Affidavit, and accordingly, is not repeated in this Joint Report.
2. In connection with these proposed CCAA proceedings, the Company is seeking the authority to continue to operate the Cash Management System to maintain the funding and banking arrangements already in place.
3. The Proposal Trustee and Proposed Monitor believes that it is necessary for the Company to continue using its existing Cash Management System. A material change to the Company's Cash Management System is likely to disrupt operations, which is not in the interest of the Company or its stakeholders.

5.0 Conclusion and Recommendation

1. Based on the foregoing, the Proposal Trustee and Proposed Monitor respectfully recommends that this Honourable Court grant the Initial Order in the form sought by the Company.

* * *

All of which is respectfully submitted,

AlixPartners Restructuring, Inc.

**ALIXPARTNERS RESTRUCTURING, INC.,
IN ITS CAPACITY AS PROPOSAL TRUSTEE OF
999 GOLD DEPOT (CANADA) LIMITED
AND AS PROPOSED CCAA MONITOR
AND NOT IN ITS PERSONAL CAPACITY**

Appendix “A”



Industry Canada
Office of the Superintendent
of Bankruptcy Canada

Industrie Canada
Bureau du surintendant
des faillites Canada

District of: Ontario
Division No.: 09 - Toronto
Court No.: 31-3367471
Estate No.: 31-3367471

In the Matter of the Notice of Intention to make a proposal of:

999 Gold Depot (Canada) Limited

Insolvent Person

KSV RESTRUCTURING INC.

Licensed Insolvency Trustee

Date of the Notice of Intention:

April 30, 2026

CERTIFICATE OF FILING OF A NOTICE OF INTENTION TO MAKE A PROPOSAL
Subsection 50.4 (1)

I, the undersigned, Official Receiver in and for this bankruptcy district, do hereby certify that the aforementioned insolvent person filed a Notice of Intention to Make a Proposal under subsection 50.4 (1) of the Bankruptcy and Insolvency Act;

Pursuant to subsection 69. (1) of the Act, all proceedings against the aforementioned insolvent person are stayed as of the date of filing of the Notice of Intention.

Date: April 30, 2026, 17:03

E-File/Dépôt Electronique

Official Receiver

151 Yonge Street, 4th Floor, Toronto, Ontario, Canada, M5C2W7, (877)376-9902

Canada

Appendix “B”



**First Report of
KSV Restructuring Inc.
as Proposal Trustee of
999 Gold Depot (Canada) Limited**

May 25, 2026

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ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

Court No.: 31-3367471

Estate No.: 31-3367471

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF
999 GOLD DEPOT (CANADA) LIMITED

FIRST REPORT OF KSV RESTRUCTURING INC.

MAY 25, 2026

1.0 Introduction

1. On April 30, 2026, 999 Gold Depot (Canada) Limited (the “**Company**”) filed a Notice of Intention to Make a Proposal (the “**NOI**”) in accordance with the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended (the “**BIA**”), and KSV Restructuring Inc. (“**KSV**”) consented to act as proposal trustee (in such capacity, the “**Proposal Trustee**”).
2. The principal purpose of these proceedings (the “**NOI Proceedings**”) is to create a stabilized environment in which the Company can preserve enterprise value, continue operating as a going concern, and evaluate restructuring alternatives arising from certain tax assessments and enforcement activity from the Canada Revenue Agency (the “**CRA**”), as discussed below.
3. KSV is filing this report (the “**First Report**”) as the Proposal Trustee.

1.1 Purposes of this Report

1. The purposes of this First Report are to:
 - a) provide background information about the Company;
 - b) report on the Company’s cash flow projection (the “**Cash Flow Forecast**”) for the period from May 30, 2026 to July 14, 2026;
 - c) summarize the Proposal Trustee’s activities since the commencement of the NOI Proceedings; and
 - d) provide the Proposal Trustee’s views regarding the Company’s request for an extension of the deadline to file a proposal from May 30, 2026 to July 14, 2026, and recommend that this Honourable Court issue the proposed order (the “**Extension Order**”) extending the deadline to file a proposal (the “**Filing Period**”) from May 30, 2026 to July 14, 2026.

1.2 Restrictions

1. In preparing this First Report, the Proposal Trustee has relied upon the Company's unaudited financial information, the Company's books and records, and discussions with the Company's representatives and legal counsel.
2. The Proposal Trustee has not audited or otherwise attempted to verify the accuracy or completeness of the financial information relied on to prepare this First Report in a manner that complies with Canadian Auditing Standards ("**CAS**") pursuant to the Chartered Professional Accountants of Canada Handbook and, accordingly, the Proposal Trustee expresses no opinion or other form of assurance contemplated under the CAS in respect of such information. Any party wishing to place reliance on the financial information should perform its own diligence.
3. An examination of the Cash Flow Forecast as outlined in the Chartered Professional Accountants of Canada Handbook has not been performed. Future oriented financial information relied upon in this First Report is based on the Company's assumptions regarding future events; actual results achieved may vary from this information and these variations may be material. The Proposal Trustee expresses no opinion or other form of assurance on whether the Cash Flow Forecast will be achieved.

1.3 Currency

1. Unless otherwise noted, all currency references in this First Report are in Canadian Dollars.

2.0 Background

1. The Company is an Ontario corporation operating a family-owned precious metals business engaged primarily in the purchase of scrap precious metals, including gold, silver, platinum, palladium, dental and other scrap, which the Company refines with the assistance of third-party refiners in Canada and the United States. Once the materials have been refined into bullion form, the Company sells the refined precious metals to its customers, primarily investors and jewellers.
2. The Company operates from a facility of approximately 780 square feet. The premises include a dedicated customer area, two customer booths, a melt room equipped with two induction furnaces and two x-ray assay machines, secure storage, scales, computers and related operational equipment.
3. The Company's business model historically generated recurring GST/HST refunds as a result of paying GST/HST on purchases of scrap precious metals while making sales of refined investment-grade gold that were frequently zero-rated or exempt for GST/HST purposes.
4. The CRA reassessed the Company for GST/HST reporting periods from April 1, 2013 to August 31, 2019 by denying approximately \$15.7 million in input tax credits, together with penalties and interest (the "**CRA Assessment**"). The CRA Assessment, and the CRA's related enforcement activities, are the driving cause of the Company's filing and are discussed in detail below. Additional information related to the Company's operations and the CRA Assessment is set out in the affidavit of Erol Aksu sworn May 25, 2026 (the "**Aksu Affidavit**"). A copy of the Aksu Affidavit is provided as Appendix "**A**" to this First Report.

3.0 CRA Assessment

1. On March 2, 2023, the CRA issued the CRA Assessment. Through the CRA Assessment, the CRA increased the Company's GST/HST liability by disallowing input tax credits in the total amount of \$15,695,124 and assessed further penalties and interest under section 285 of the *Excise Tax Act*.
2. The Company has challenged the CRA Assessment by filing a Notice of Objection on May 10, 2023, and, following CRA's confirmation of the CRA Assessment by letter dated May 13, 2024, the Company filed a Notice of Appeal in the Tax Court of Canada dated February 9, 2026. That appeal remains outstanding.
3. The CRA also undertook a series of enforcement measures, including issuing successive Requirements to Pay and, by letter dated October 23, 2025, asserting that the Company owed \$31,807,933. The CRA issued a Requirement to Pay dated April 22, 2026 (the "**April RTP**"), to the Canadian Imperial Bank of Commerce ("**CIBC**"), where the Company maintained its sole operating bank account.
4. As a result of the April RTP, the Company lost access to its operating funds, which materially disrupted its ability to continue ordinary-course operations, and precipitated the NOI filing.

4.0 Developments Since the NOI Filing

1. Following the NOI filing, counsel to the Company engaged with representatives of the Department of Justice and CRA regarding the withdrawal of the April RTP.
2. The CRA subsequently issued correspondence confirming that the April RTP had been cancelled effective May 4, 2026.
3. Following further discussions with CIBC, the Company regained access to its operating account and resumed ordinary-course operations. Such operations, however, are being conducted under the specter of a claim from the CRA exceeding \$32 million, which is stayed by the filing of the NOI.
4. Since the commencement of the NOI Proceedings, the Company has continued operating in the ordinary course and has worked with the Proposal Trustee and its advisors to evaluate restructuring alternatives and stabilize operations.

5.0 Cash Flow Forecast

1. The Company has prepared the Cash Flow Forecast for the period from May 29, 2026 to July 14, 2026, to align with the request for an extension of the Filing Period. The Cash Flow Forecast together with Management's Report on the Cash-Flow Statement, as required by subsection 50.4(2)(c) of the BIA, is provided in Appendix "**B**" to this First Report.

2. A summary of the Cash Flow Forecast is provided below:

(unaudited; CAD; \$000s)	May 29, 2026 - July 14, 2026
Receipts	\$4,568
Disbursements	
Payroll	(60)
Materials	(4,500)
Rent	(9)
HST Paid	(68)
Professional Fees	(200)
Operating Expenses	(53)
	<u>(4,890)</u>
Net Cash Flow	(323)
Opening Cash Balance	950
Net Cash Flow	<u>(323)</u>
Closing Cash Balance	<u>627</u>

3. Based on the Cash Flow Forecast, the Proposal Trustee is of the view that the Company is expected to have sufficient liquidity to continue operating during the proposed extended Filing Period.
4. The Proposal Trustee notes that the Cash Flow Forecast is based on assumptions provided by management and actual results may vary from forecast results.

6.0 Proposal Trustee's Activities

1. Since its appointment, the Proposal Trustee has undertaken the following activities in connection with the NOI Proceedings:
- a) reviewed the Company's financial position and liquidity requirements;
 - b) monitored the Company's receipts and disbursements;
 - c) assisted the Company in communications with the CRA and financial institutions regarding the April RTP to facilitate ongoing access to bank accounts;
 - d) reviewed the Cash Flow Forecast and underlying assumptions;
 - e) attended meetings and discussions with Company and its legal counsel regarding restructuring alternatives;
 - f) prepared this First Report to provide the Court with an update on the NOI Proceedings and to support the request for the Extension Order; and
 - g) addressed administrative matters, including compliance with reporting obligations under the BIA.

7.0 Filing Extension

1. The Company is seeking an extension of the time to file a proposal with the Official Receiver from May 30, 2026 to July 14, 2026.

2. The Proposal Trustee supports the Company's request for the following reasons:
 - a. the Company has complied with all of its obligations under the BIA;
 - b. the Company is acting in good faith and with due diligence;
 - c. the Proposal Trustee is not aware of any creditor that would be materially prejudiced if the extension being applied for is granted;
 - d. based on the Cash Flow Forecast, the Company is expected to have sufficient liquidity to fund their operations in the normal course during the extended Filing Period;
 - e. the Company requires additional time to continue discussions with stakeholders and evaluate restructuring alternatives, including whether restructuring efforts should continue under the BIA, where a viable proposal may be made to creditors, or continue pursuant to proceedings under the *Companies' Creditors Arrangement Act*; and
 - f. the length of the requested extension of the Filing Period does not exceed the 45 days prescribed by s. 50.4(9) of the BIA.
3. For the foregoing reasons, the Proposal Trustee is of the view that that the Company satisfies the requirements set out in subsections (a) through (c) of s. 50.4(9) of the BIA.

8.0 Conclusion and Recommendation

1. Based on the foregoing, the Proposal Trustee respectfully recommends that this Honourable Court grant the Extension Order.

* * *

All of which is respectfully submitted,

KSV Restructuring Inc.

**KSV RESTRUCTURING INC.,
IN ITS CAPACITY AS PROPOSAL TRUSTEE OF
999 GOLD DEPOT (CANADA) LIMITED
AND NOT IN ITS PERSONAL CAPACITY**

Appendix “C”

999 Gold Depot (Canada) Limited (the "Company")
Projected Statement of Cash Flow
For the Period Ending November 14, 2026
(Unaudited, \$CAD)

Week ending	Notes	10-Jul-26	17-Jul-26	24-Jul-26	31-Jul-26	07-Aug-26	14-Aug-26	21-Aug-26	28-Aug-26	04-Sep-26	11-Sep-26	18-Sep-26	25-Sep-26	02-Oct-26	09-Oct-26	16-Oct-26	23-Oct-26	30-Oct-26	06-Nov-26	14-Nov-26	Total
Receipts																					
Operating receipts	2	700,000	1,000,000	300,000	300,000	1,500,000	300,000	300,000	1,500,000	300,000	300,000	1,500,000	300,000	300,000	1,500,000	300,000	300,000	1,500,000	300,000	300,000	12,800,000
HST collected	3	10,500	15,000	4,500	4,500	22,500	4,500	4,500	22,500	4,500	4,500	22,500	4,500	4,500	22,500	4,500	4,500	22,500	4,500	4,500	192,000
Total receipts		710,500	1,015,000	304,500	304,500	1,522,500	304,500	304,500	1,522,500	304,500	304,500	1,522,500	304,500	304,500	1,522,500	304,500	304,500	1,522,500	304,500	304,500	12,992,000
Disbursements																					
Payroll		20,000	-	20,000	-	20,000	-	20,000	-	20,000	-	20,000	-	22,500	-	22,500	-	22,500	-	22,500	210,000
Materials	4	500,000	500,000	1,000,000	500,000	500,000	1,000,000	500,000	500,000	1,000,000	500,000	500,000	1,000,000	500,000	500,000	1,000,000	500,000	500,000	1,000,000	500,000	12,500,000
Rent	5	-	-	-	-	4,360	-	-	-	4,360	-	-	-	4,360	-	-	-	4,360	-	4,360	17,442
HST paid	3	8,475	8,475	15,975	8,475	18,225	15,975	8,475	8,475	25,725	8,475	8,475	15,975	18,225	8,475	15,975	8,475	8,475	8,475	25,725	245,025
Professional Fees	6	-	-	-	-	75,000	-	-	-	75,000	-	-	-	75,000	-	75,000	-	75,000	-	75,000	300,000
Other (Operating Expenses)	7	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	142,500
Contingency		4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	76,000
Total disbursements		539,975	519,975	1,047,475	519,975	629,085	1,027,475	539,975	519,975	1,136,585	519,975	539,975	1,027,475	631,585	519,975	1,049,975	519,975	542,475	1,116,585	542,475	13,490,967
Net cash flow		170,525	495,025	- 742,975	- 215,475	893,415	- 722,975	- 235,475	1,002,525	- 832,085	- 215,475	982,525	- 722,975	- 327,085	1,002,525	- 745,475	- 215,475	980,025	- 812,085	- 237,975	- 498,967
Opening cash balance		1,056,802	1,227,327	1,722,352	979,377	763,902	1,657,316	934,341	698,866	1,701,391	869,306	653,831	1,636,356	913,381	586,295	1,588,820	843,345	627,870	1,607,895	795,810	1,056,802
Net cash flow		170,525	495,025	- 742,975	- 215,475	893,415	- 722,975	- 235,475	1,002,525	- 832,085	- 215,475	982,525	- 722,975	- 327,085	1,002,525	- 745,475	- 215,475	980,025	- 812,085	- 237,975	- 498,967
Ending cash balance		1,227,327	1,722,352	979,377	763,902	1,657,316	934,341	698,866	1,701,391	869,306	653,831	1,636,356	913,381	586,295	1,588,820	843,345	627,870	1,607,895	795,810	557,835	557,835

999 Gold Depot (Canada) Limited (the "Company")
Notes to the Projected Statement of Cash Flow
For the Period Ending November 14, 2026
(Unaudited, \$CAD)

Purpose and General Assumptions

1. The purpose of the projection is to present a cash flow forecast of the Company for the period July 10, 2026 to November 14, 2026 (the "Period") in respect of the Company's proposed proceedings under the Companies' Creditors Arrangement Act ("CCAA"). The forecast assumes that the Company file for protection under the CCAA on July 13, 2026.

The cash flow projection has been prepared based on hypothetical and most probable assumptions.

Hypothetical Assumptions

- Operating receipts represent estimated sales of gold to retail customers and refinery clients, consistent with the Company's historical sales pattern.
- Purchases and sales of fine gold are exempt from HST. Certain sales require HST to be charged, HST collected and paid represents an estimate of these amounts.

Probable Assumptions

- Reflects costs of inventory purchases during the Period.
- Represents rent payable for the Company's leased premises in Toronto.
- Reflects professional fees for the Company's counsel and tax counsel, the proposed Monitor and the proposed Monitor's counsel.
- Reflects estimated operating expenses including utilities, shipping, security and miscellaneous office costs.

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

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

AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF 999 GOLD DEPOT (CANADA) LIMITED

MANAGEMENT'S REPORT ON CASH FLOW STATEMENT
(paragraph 10(2)(b) of the CCAA)

The management of 999 Gold Depot (Canada) Limited (the "**Applicant**") has developed the assumptions and prepared the attached consolidated statement of projected cash flow as of the 7th day of July 2026, for the period July 10th, 2026 to November 14th, 2026 (the "**Cash Flow Forecast**").

The Applicant confirms that the hypothetical assumptions on which the Cash Flow Forecast is based are reasonable and consistent with the purpose described herein, and the probable assumptions are suitable supported and consistent with the plans of the Applicant and provide a reasonable basis for the Cash Flow Forecast. All such assumptions are disclosed in the notes to the Cash Flow Forecast (the "**Notes**").

Since the Cash Flow Forecast is based on assumptions regarding future events, actual results will vary from the information presented and the variations may be material.

The Cash Flow Forecast has been prepared solely for the purpose described herein, using the hypothetical and probable assumptions set out in the Notes. Consequently, readers are cautioned that the Cash Flow Forecast may not be appropriate for other purposes.

Dated at Toronto, Ontario this 7th day of July, 2026.

999 GOLD DEPOT (CANADA) LIMITED


Per: Agop Aksu

Appendix “D”

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

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

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF 999 GOLD DEPOT (CANADA) LIMITED**

**PROPOSED MONITOR'S REPORT ON CASH FLOW
STATEMENT**

(paragraph 23(1)(b) of the CCAA)

The attached consolidated statement of projected cash-flow of 999 Gold Depot (Canada) Limited (the "**Applicant**") as of the 7th day July, 2026, consisting of a weekly projected cash flow statement for the period July 10th, 2026 to November 14nd, 2026 (the "**Cash Flow Forecast**") has been prepared by the management of the Applicant for the purpose described herein, using probable and hypothetical assumptions set out in the notes to the Cash Flow Forecast.

Our review consisted of inquiries, analytical procedures and discussions related to information supplied by the management of the Applicant. We have reviewed the support provided by management for the probable and hypothetical assumptions and the preparation and presentation of the Cash Flow Forecast.

Based on our review, nothing has come to our attention that causes us to believe that, in all material respects:

- a) the hypothetical assumptions are not consistent with the purpose of the Cash Flow Forecast;
- b) as at the date of this report, the probable assumptions developed by management are not suitably supported and consistent with the plans of the Applicant or do not provide a reasonable basis for the Cash Flow Forecast, given the hypothetical assumptions;
or
- c) the Cash Flow Forecast does not reflect the probable and hypothetical assumptions.

Since the Cash Flow Forecast is based on assumptions regarding future events, actual results will vary from the information presented, and the variations may be material. Accordingly, we express no assurance as to whether the Cash Flow Forecast will be achieved. We express no opinion or other form of assurance with respect to the accuracy of any financial information presented in this report, or relied upon in preparing this report.

The Cash Flow Forecast has been prepared solely for the purpose described herein, and readers are cautioned that it may not be appropriate for other purposes.

Dated at Toronto, Ontario this 7th day of July, 2026.

AlixPartners Restructuring, Inc.

**ALIXPARTNERS RESTRUCTURING, INC.,
IN ITS CAPACITY AS PROPOSED MONITOR
OF 999 GOLD DEPOT CANADA LIMITED
AND NOT IN ITS PERSONAL CAPACITY**

**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF 999 GOLD DEPOT
(CANADA) LIMITED**

Court No.: 31-3367471
Estate No.: 31-3367471

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

Proceeding Commenced at Toronto

JOINT REPORT
Dated July 8, 2026

BLAKE, CASSELS & GRAYDON LLP
Barristers and Solicitors
199 Bay Street
Suite 4000, Commerce Court West
Toronto, Ontario M5L 1A9

Chris Burr, LSO #55172H
Tel: 416-863-3261
Email: chris.burr@blakes.com

Lawyers for the Proposal Trustee and
Proposed Monitor