

ICMI Cyanide Code Gold Mining Recertification Audit

Summary Audit Report

**Agnico Eagle Mines Limited,
Detour Lake Mine**

Ontario, Canada

**Submitted to:
The International Cyanide Management Institute
1400 I Street, NW – Suite 550
Washington, DC 20005
USA**

2022 Audit Cycle



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DETOUR LAKE MINE
ICMC SUMMARY AUDIT REPORT

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Mining Operation: Detour Lake Mine

Mine Owner: Agnico Eagle Mines Limited


Mine Operator: Agnico Eagle Mines Limited

Name of Responsible Manager: Larry Lazeski, General Manager

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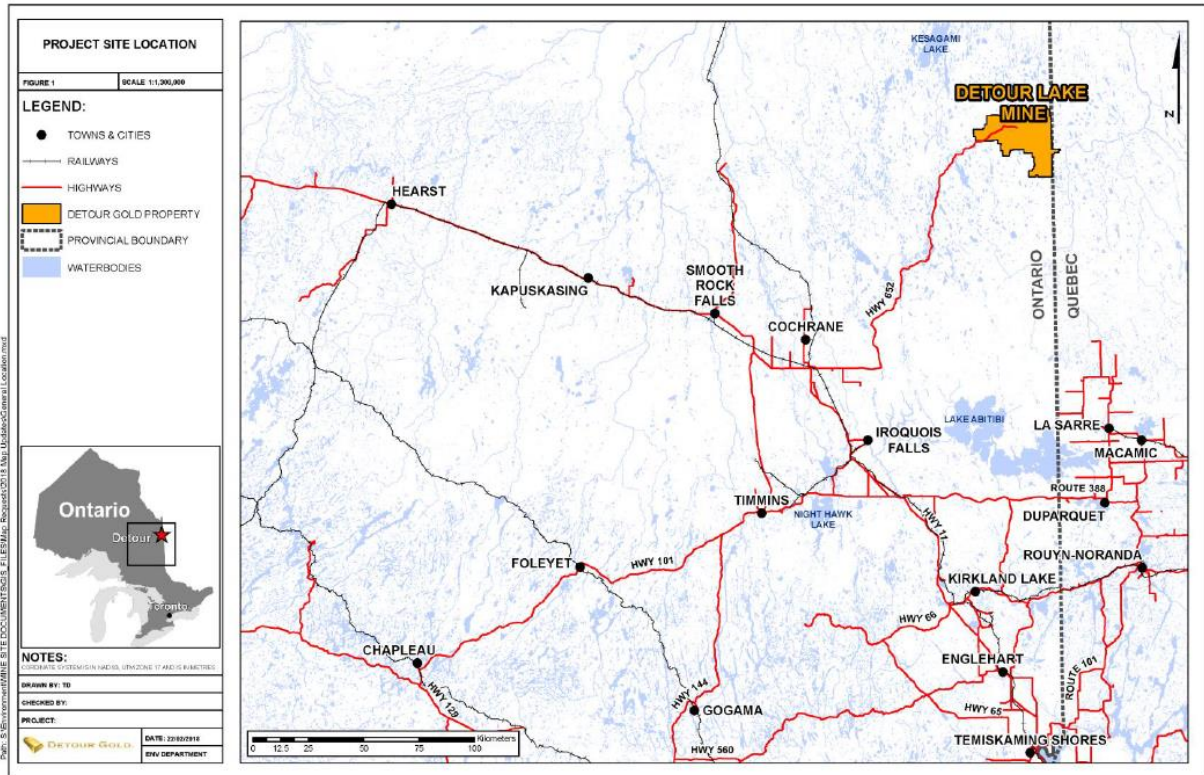
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Location and description of the operation


The Detour Lake mine (Detour) location is presented in the picture below



The Detour Lake open pit mine is located in northeastern Ontario, approximately 300 kilometers northeast of Timmins and 185 kilometers by road northeast of Cochrane, within the northernmost Abitibi Greenstone Belt. The operation is situated in the area of the historic Detour Lake open pit/underground mine operated by Placer Dome which produced 1.8 million ounces of gold from 1983 to 1999. Detour Gold acquired the property in January 2007, completed a feasibility study in June 2010 and commenced gold production in February 2013. The Detour Lake operation has a mine life of approximately 22 years with an average gold production of 659,000 ounces per year and includes the development of the West Detour project which is currently being permitted.

Cyanide is delivered at the Detour Lake mine in solid form in 20 tonne isotanks or ISO containers. The ISO container is connected to the dilution system, where water is pumped into the ISO container to dissolve the cyanide to provide a 30% cyanide solution which is stored in two (2) 5.0 metres diameter x 7.5 metres high storage tanks. This reserve is equivalent to 4.5 days of consumption. The cyanide solution is fed using metering pumps directly from the storage tanks to the required points of addition. The dosage of cyanide into the leaching tanks, the first and third leach tank of each leach train, is controlled with cyanide analyzers to ensure that the

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required concentration is maintained. Cyanide is also used in the intensive cyanidation system and for stripping of gold from carbon. The total yearly consumption of cyanide is estimated at 0.36 kg/ton or 7,140 ton/annum.

The Detour Lake comminution process is based on two parallel semi-autogenous ball mill crusher (SABC) lines, each fed from an individual reclaim tunnel. The ore is first dumped from trucks into the gyratory crusher (i.e. primary crushing), which is located approximately 450 metres northeast of the open pit mining operation. The crushed ore is conveyed to a stockpile of 12 hours live capacity (36 hours total). The stockpiled ore is reclaimed through two tunnels, one per grinding line, each having two apron feeders capable of delivering the full throughput individually. For each line, the ore is conveyed to a secondary crusher installed in open circuit and equipped with a bypass. The secondary crusher products are conveyed to the SAG (Semi-autogenous grinding) mills and processed in closed circuit with single deck screens. The screen oversize from each line is recycled to a pebble crusher and returned to the SAG mill feed. The SAG screen undersize, together with the ball mill discharge and rejects from the gravity circuits, are pumped to cyclone clusters (one per grinding line).

A portion of the ball mill product is pumped into dedicated gravity concentration circuits consisting of sizing screens and centrifugal gravity concentrators. The gravity concentrate from both lines is treated in a common intensive leach cyanidation reactor to recover the liberated coarse gold. The gold in the pregnant solution from the intensive leach reactor is recovered in a dedicated electrowinning circuit.

Cyclone overflow from the two ball mill circuits is directed to the pre-leach thickener. The thickener underflow is distributed to two (2) parallel leach trains of 10 tanks each, each leach train providing 29 hours of leaching retention time. After leaching, the gold in solution is recovered in a carousel CIP (Carbon in Pulp) circuit, one for each parallel leach train. The loaded carbon from each CIP circuit is acid washed as required and the pregnant solution is then stripped in-line with electrowinning. After the stripping cycle the electrowinning sludge (gold) is pumped to a collection tank, then is filtered and finally the cake is dried and is ready to be mixed with fluxes and placed in the induction furnace and the gold recovered is poured as doré bars at regular intervals. The stripped carbon is regenerated and returned to the CIP circuits.

Tails from each CIP circuit are combined and sent to a pre-detox thickener to recover as much cyanide solution as is economically practical before being diluted and fed to a cyanide destruction system. The cyanide destruction system requires lime, SO₂, and copper sulphate, to eliminate the cyanide in the tailings stream after the pre-detox thickener. Based on the cyanide destruction test work results the required pH in the tanks is 10. The detoxified tailings are sent to the TMA (Tailings Management Area) for settling and retention. The excess water from the TMA is reclaimed and recycled back to the processing plant into the milling circuit.

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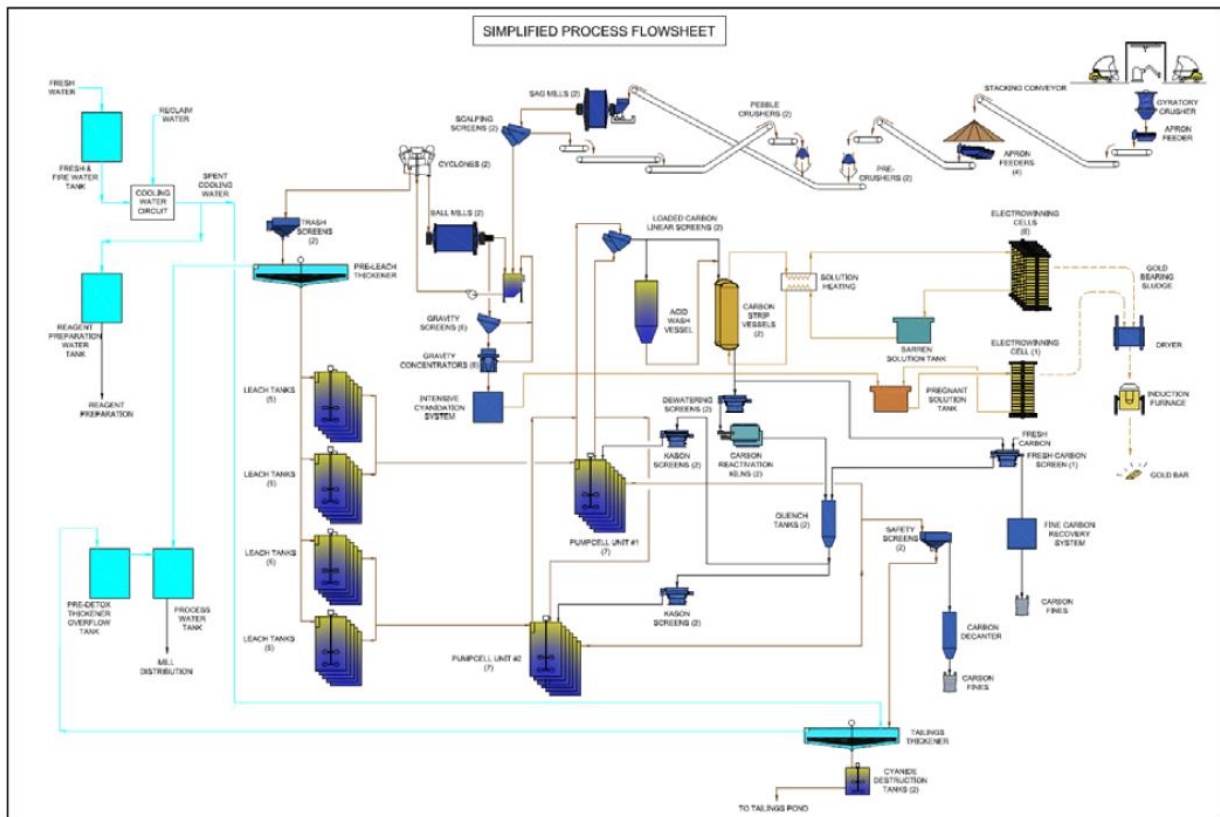
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The scope of the recertification audit at Detour Lake mine includes the following cyanide facilities: Process plant facilities including an Intensive Leach Reactor (ILR), pre-leach thickener tank, 4 trains of 5 leach tanks each, Carbon in Pulp (CIP) circuit, barren tank, pre-detox thickener, and detox tanks. The scope also includes the tailings pipeline corridor, Tailings Management Area (TMA) Cell 1 and Cell 2, seepage collection ponds, the milling circuit, and a cyanide mixing area including cyanide mixing and distribution / storage tanks. There are no treated cyanide water discharges to the environment at Detour Lake.

New facilities constructed since the 2019 recertification audit include rising of the TMA dam for Cell 1 Stage 8, construction and commissioning of TMA Cell 2 Stages 1 and 2, a new section of the TMA pipeline corridor for Cell 2, and a pipeline to bypass the detox system.

Cyanide is delivered at the Detour Lake mine in solid form in 20 tonne isotanks or ISO containers. The isotank is connected to the dilution system, where water is pumped into the isotank to dissolve the cyanide to provide a 30% cyanide solution which is be stored in a storage tank.

The Detour Lake process flowsheet is presented below:



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Auditor's Finding

The International Cyanide Management Institute (ICMI) approved Audit Team verified that Detour Lake Mine operation is in **SUBSTANTIAL COMPLIANCE** with ICMI Cyanide Code requirements for Gold Mining operations.

This operation was found in substantial compliance with the Cyanide Code based on the audit findings discussed in this report under the following Standard(s) of Practice: 4.4, 4.8, 6.2.

Detour Lake Mine has experienced zero significant cyanide incidents during this 3-year recertification audit cycle.

This operation was determined to be in SUBSTANTIAL COMPLIANCE with the International Cyanide Management Code.


Auditor's Attestation

Audit Company:	SmartAccEss Socio Environmental Consulting, LLC
Lead Auditor:	Luis (Tito) Campos E-mail: titocampos@smartaccess.us
Mining Technical Auditor:	Nick Gow Email: ngow@forteanalytical.com 
Date(s) of Audit:	October 11 th – 14 th , 2022

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.


I attest that this Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Institute for Mining Operations Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

Detour Lake Mine
Name of Operations


Signature of Lead Auditor

October 14th, 2022
Date

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SUMMARY AUDIT REPORT

1. *PRODUCTION AND PURCHASE*: Encourage responsible cyanide manufacturing by purchasing from manufacturers that operate in a safe and environmentally protective manner.

Standard of Practice

1.1 Purchase cyanide from certified manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 1.1

Discuss the basis for this Finding/Deficiencies Identified:

The auditors were informed that in December 2021, The Chemours Company has sold their mining solutions business to “Draslovka Mining Solutions”. The ICMI web page shows Draslovka as the Cyanide Producer certified under the Code. The Chemours Memphis Plant is now called the Draslovka Memphis Plant. Sodium Cyanide purchased by Detour during the recertification period was manufactured by The Draslovka Memphis Plant (Tennessee, USA), facility that is currently certified under the Code. This plant achieved the original certification in 2006 and has maintained compliance and its ICMI certification since then. The latest recertification was on January 21st, 2020. In addition, the transfer of bulk cyanide to isotainers at Chemours Octium Malartic Bulk Transloading Facility, considered a production activity, was recertified on November 21st, 2021, as published on the ICMI website. This facility was also acquired by Draslovka, and its official certification name is now “Draslovka Octium Malartic Bulk Transloading Facility”.

Detour has a sales agreement to purchase sodium cyanide from Chemours Canada Company (now Draslovka Mining). The agreement requires the cyanide producer to be certified in compliance with the Code. The agreement with Draslovka runs until December 2022. Clause 12 of the contract states that the supplier must be certified under the Code. The auditor verified that Detour and Draslovka have signed a letter to ratify the agreement.

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2. TRANSPORTATION: Protect communities and the environment during cyanide transport.

Standards of Practice

2.1 Require that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training and emergency response.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 2.1

Discuss the basis for the Finding/Deficiencies Identified:

Detour provided the most recent re-certification audit for Chemours (now Draslovka) indicating the complete Canada Cyanide Supply Chain of Custody from Memphis Production Plant to Detour Lake Mine. The auditors reviewed three chains of custody files in 2022 and found them in conformance. Chemours Canada (now called Draslovka Mining Solutions) supply chain consists of rail and truck transport from the Memphis plant as part of the US/Canada Rail and Barge Supply Chain to the several interim storage facilities including the Chemours warehouse in Malartic, CAN (Canada). Transportation of wagons to trucks at the Chemours warehouse Malartic, CAN. Bulk Transloading Facility (to isotainers) in Malartic. Transport of isotainers by truck from Malartic, to Detour Lake by Groupe Robert. The current written agreement for cyanide supply between Detour Lake mine and Chemours (now transferred to Draslovka), the cyanide producer, includes Chemours responsibility to transport the cyanide from the Memphis, Tennessee plant to Detour Lake.

During the audit, it was verified through the ICMI's website, letters, and e-mails, that all cyanide transporters involved in Detour Lake Cyanide supply chain were currently Code certified companies or provided evidence of an independent third-party audit within the recertification timeframe (including extensions). The Draslovka US/Canada Rail and Barge Supply Chain was certified as in full compliance against The Code on April 7th, 2022. The US/Canada Rail & Barge Supply Chain includes rail movements from the Memphis production plant to rail yards in Malartic, CAN for customer locations in Canada. Draslovka's Canada Supply Chain certification was recertified in full compliance on January 21st, 2020. The Draslovka Canada Supply Chain includes rail transport to the Canada Bulk Transloading operation in Malartic, truck transport by Groupe Robert, and interim storage facilities in Rouyn-Noranda and Varennes.

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3. HANDLING AND STORAGE: Protect workers and the environment during cyanide handling and storage.

Standards of Practice

3.1 Design and construct unloading, storage and mixing facilities consistent with sound, accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 3.1

Discuss the basis for this Finding/Deficiencies Identified:

Detour uses cyanide from isotanks, which are stored in a single location inside the plant area, adjacent to the process plant building. During the audit, approximately 15 to 20 isotanks were stored in the area. The cyanide storage area does not have an engineered design (e.g. no roof, is located outdoors); however, Detour takes advantage of the characteristics of the isotanks to meet the intent of the Code requirements (i.e. the isotanks have by design a secondary containment in its structure which provides coverage from rain and maintain the isotanks above ground). The Detour process plant facility was designed by BBA engineers, while the cyanide mixing system, including the cyanide mixing and cyanide distribution tanks, was designed by Berlie Falco Technologies. A complete set of design and as-built drawings for the cyanide mixing system has been retained from the initial certification audit and were available for review by the auditors. These drawings are properly stamped by a Certified Professional Engineer Registered in the Province of Ontario. Cyanide offloading, mixing and storage facilities remain largely unchanged from the 2019 initial certification audit. The only change for this recertification period was the addition of an independent exhaust fan for the cyanide mixing tank that daylight through the roof. The field portion of the audit confirmed that the cyanide mixing area was located within the internal structure of the process plant on concrete hardstanding maintained in good condition. Cyanide mixing and distribution tanks were located within containment concrete berms. The mixing area is also subject to daily inspections at shift start to detect any obvious releases or failure in containment.

The cyanide storage area is located inside the plant area and located far away from communities and surface waters. The cyanide storage is adjacent to the process plant building, where the offices of Process personnel are located. The process plant has an HCN gas monitor equipped with visual and audible alarms at the cyanide mixing area that will alert employees in case of a release of HCN gas. In addition, the standard operating procedure (SOP) PPO-SOP-1.15.5 "Process Plant Access / Evacuation" includes evacuation procedures for the process plant in cases of high concentrations of HCN gas. Any potential spills of solid cyanide from the isotanks in the storage area will be contained as the storage area floor is approximately 0.25 meters below

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outside grade. The drainage system from the plant area directs all meteoric water to the west pond and sediment pond #2, where any cyanide solution spill would be collected and pumped back to the process. These ponds represent an additional contingency measure in addition to the existing secondary containment systems of the process plant facilities. In case cyanide solution overflows outside of the plant containment systems due to an upset condition, it would be captured at these two ponds.

Detour has a preparation area for cyanide that includes a mixing tank and a distribution tank. There are level indicators and high-level alarms installed on both tanks. These levels are continuously monitored from the control room and can also be monitored at the cyanide mix area through the HMI (Human-Machine Interface). Arrangements remain unchanged since the initial certification audit. There are both a Hi-level and Hi-Hi level alarm on each tank. For the cyanide mixing tank, the Hi-level and Hi-Hi level alarms are set at 90% and 95%, respectively. For the cyanide distribution tank, the Hi-level and Hi-Hi level alarms are set at 80% and 90% respectively. In addition, there are audible and visible alarms at the tanks. The level indicators in the cyanide mixing area are continuously monitored to ensure they are operational. The system has interlock valves that shut down the pumps automatically if there is a loss of signal between the probe and the PLC (Programming Logic Control). These level indicators are included in the preventive maintenance program and are maintained annually.

Cyanide mixing and distribution tanks are secured to solid, reinforced concrete pedestal-type foundations and are contained within concrete berms with good condition concrete flooring with epoxy sealing. Arrangements remain unchanged since the initial certification audit. During the field inspection, the containment area and sump were noted to be in good condition, with no significant damage, spalling or cracking evident. The containment volume for the cyanide mixing and distribution tanks is approximately 35% of the required volume. The remainder of the containment is provided within the process plant ground floor area, which provides additional capacity to contain 110% volume of the largest tank. In addition, there is a sump that collects any fluids in the area and pumps it to final tails. The berms and containment areas are also subject to daily inspections prior to cyanide mixing activities.

The isotank cyanide storage area does not have a roof; however, the site uses the characteristics of the isotanks to meet the intent of the Code requirements (i.e. the isotanks have by design a secondary containment in its structure which provides coverage from rain and maintain the isotanks above ground). The cyanide mixing and distribution tanks are located under the roof of the process plant area. The risk of potential contact with meteoric water is very low. The isotank cyanide storage is in an outdoor area in the north-west corner adjacent to the process plant building. As such, it has adequate ventilation and build-up of hydrogen cyanide gas is unlikely to occur. The cyanide mixing and distribution tanks are in a corner of the plant area, next to the cyanide storage area, and have appropriate ventilation to prevent build-up of hydrogen cyanide gas. In addition, there is a fixed HCN monitor with audible alarm. The isotank cyanide storage area is fenced and secured with a lock. Access to the cyanide storage area is restricted. Warning signage is posted on the fence. The isotanks are placed within the storage area by use of a sea-

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can handler crane to handle the isotanks over the fence. The fence doors do not need to be opened for this activity. The cyanide mixing and distribution tanks are located within the plant building and have restricted public access. The area can only be accessed with the presence of security personnel. In addition, the offload area is continually monitored by video cameras by the security personnel. The storage area is dedicated to sodium cyanide storage only, with no other materials permitted to be stored. Both full and empty isotanks are stored within the storage area. No storage of other materials was observed during the field inspection. The cyanide mixing and distribution tanks are stored within a dedicated separate containment area, within concrete berms, with no other materials permitted to be stored. The containment area outside the immediate concrete containment provided for the cyanide mixing and distribution tanks (i.e., the process plant ground floor area) is also located separate from incompatible materials with concrete berms that will prevent accidental mixing.

3.2 Operate unloading, storage and mixing facilities using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 3.2

Discuss the basis for this Finding/Deficiencies Identified:

Detour receives solid cyanide in isotanks; no drums or wooden crates are involved. The empty isotanks are returned to the storage area, labelled accordingly, and then removed from site and shipped back to the vendor. The isotanks are rinsed on the outside with fresh water prior to removing it from the cyanide secondary containment mixing area. This practice was observed during a cyanide mixing event. To ensure that the isotanks are empty before returning them to the vendor, Detour has implemented a procedure to triple air flush the isotank as per PPO-SOP-10.1.11 "Mixing Sodium Cyanide". The procedure PPO-SOP-10.15.5 "Cyanide Isotainer Delivery, Off Load and Change Out" indicates that the external shell of the isotank needs to be thoroughly washed with fresh water to remove any dust and contaminants prior to moving the isotank outside of the cyanide mixing containment area.

Detour has PPO-SOP-10.1.11 "Mixing Sodium Cyanide" that outlines the requirements for inspection, observation and mixing of cyanide solutions, as well as the operation and function of valves, pumps and various interlocks within the cyanide mixing process. It also includes instructions for the prefill of the cyanide mixing tank with reclaim water and caustic solution. There is a checklist for cyanide mixing that requires measuring pH levels, inspection of emergency showers and eye wash stations, among other requirements for safe cyanide management. Procedure PPO-SOP-10.15.5 "Cyanide Isotainer Delivery, Off Load and Change Out" indicates that the cyanide isotanks are handled using a sea-can handler crane, either to

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place them within the storage area or in the self-propelled cart via rail that will move the isotank into the cyanide mixing area. The same equipment is used to remove empty isotank from the self-propelled cart back into the storage area and for return to the vendor. During the maneuver of the isotanks with the sea-can handler, access to the area for both vehicles and pedestrians, is restricted with cones. Procedure PPO-SOP-10.15.5 "Cyanide Isotainer Delivery, Off Load and Change Out" also indicates that isotanks shall not be stacked more than 2 high at a time and to do not stack full isotanks on top of empty ones. Procedure PPO-SOP-10.1.11 "Mixing Sodium Cyanide" requires that any cyanide spill or cyanide on the isotank must be hosed to the sump using fresh water prior to removing the isotank from the mixing area. This practice was observed in the field during a cyanide mixing event. No spills related to cyanide mixing were reported for the recertification period. Procedure PPO-SOP-10.1.11 "Mixing Sodium Cyanide" requires operators to use the appropriate personal protective equipment (PPE) during mixing activities. These include steel-toed rubber boots, rubber gloves, approved respirator, face shield, Tychem coveralls with hood, hardhat, hearing protection and a personal HCN gas badge. PPO-SOP-10.37.4 "Surveillance of Cyanide Containment Area" requires that security personnel check that the correct PPE is being used prior to starting the mixing activities and observes all the activities until they are completed. This procedure requires security personnel to act as an observer to view the mixing process as it occurs. Video monitors are in place to always monitor cyanide mixing activities. The cyanide briquettes inside the isotank already come with red colorant dye. Colorant dye is added to solid cyanide by Draslovka. This was verified by the auditors during the field visit and through interviews with process personnel. A cyanide mixing event was observed during the audit. The review indicated that Detour has appropriate SOPs and practices to handle and prepare cyanide solutions in a safe manner.

4. OPERATIONS: Manage cyanide process solutions and waste streams to protect human health and the environment.

Standards of Practice

4.1 Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 4.1

Discuss the basis for the Finding/Deficiencies Identified:

The scope of the recertification audit at Detour Lake mine includes the following cyanide facilities: Process plant facilities including an Intensive Leach Reactor (ILR), pre-leach thickener tank, 4

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trains of 5 leach tanks each, Carbon in Pulp (CIP) circuit, barren tank, pre-detox thickener, and detox tanks. The scope also includes the tailings pipeline corridor, Tailings Management Area (TMA) Cell 1 and Cell 2, seepage collection ponds, the milling circuit, and a cyanide mixing area including cyanide mixing and distribution / storage tanks. There are no treated process water discharges to the environment at Detour Lake.

Detour has manuals and Standard Operating Procedures (SOPs) for the safe operation of cyanide facilities. There are approximately 30 documents between manuals, procedures and checklists related to cyanide management. All SOPs include a description of the tasks to be performed, a section related to PPE requirements and considerations of safety hazards. Procedures are reviewed and updated when there are significant changes in the tasks. Procedures and work instructions were reviewed and found to be sufficiently detailed to enable safe operation.

Detour has manuals and procedures that identify the assumption and parameters for the safe operation of cyanide facilities. The Operational Maintenance and Surveillance Management (OMS) Water and Tailings Management Manuals considers an Environmental Design Flood (EDF) event of 431 mm for Cell 1 and 478mm for Cell 2 of direct precipitation in each cell, respectively, corresponding to a spring run-off event of duration 30 days and frequency 1:100 years. Maximum operating water level in Cell 1 and Cell 2 TMA is 0.5 meters and 2.5 meters below the spillway, respectively, to ensure the EDF can be contained. Freeboard data for the recertification period was reviewed by the auditors and evidenced that at all times the pond elevation maintained at least the required freeboard. This was also evidenced by the auditors during the field visit to the TMA. The OMS Manuals also includes a current operating target of 35 mg/l WAD (Weak Acid Dissociable) cyanide when leaving the detox system. This target is reviewed on a continuous basis based on the water quality observed in the decant pond to maintain a concentration that is not toxic to avian and terrestrial wildlife that could come in contact with the pond water for a short period of exposure. This variation of WAD cyanide concentrations at the outlet of the detox system during the summer months are detailed in PPO-SOP-11.3.5 "Managing of High CN WAD in Detox Discharge". The OMS Manuals also include a maximum WAD cyanide concentration of 50 mg/l at the tailings decant pond. Detour does not have direct water discharges to surface water that have been treated for cyanide.

Detour has developed and implemented SOPs for cyanide related tasks, which describe the standard practices necessary for the safe and environmentally sound operation of cyanide facilities. The operation has identified equipment, personnel, and procedures for cyanide unloading and mixing activities as well as for storage facilities, milling facilities, processing facilities, TMA facilities and all associated piping and pumps as having contact with cyanide. The Operational Maintenance and Surveillance Management (OMS) – Water and Tailings Management Manuals includes a list of critical aspects and areas to be inspected and inspection frequencies. At the TMA, Detour conducts inspections for covers on the tailings pipeline corridor, emergency spillway basin status (which is an emergency pond close to a water course), conductivity probes to detect leaks from tailings pipelines, seepage ponds and pumps, wildlife

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mortalities, erosion on TMA dam walls, freeboard, spillway, additional seepage that could appear at the toe of the TMA dams, among others. These inspections are conducted by different areas (Process, TMA, and Environmental) at frequencies that vary from daily, weekly, monthly, biannually, and annually. In the case of the process plant, process shift inspections includes: grinding circuit, CIP, leach tanks area, lime area, TMA and pipeline corridor, lead nitrate, reagent storage area, cyanide isotank and equipment, SO₂ off-load, safety and trash screens, secondary crusher and elution area, secondary containment conditions at the leach tanks and detox areas, among others. It is the professional opinion of the auditors that the inspection program of cyanide facilities, including unloading, mixing and storage activities, and the frequency of inspections are sufficient to assure and document that the operation is safe and functioning within design parameters. The auditors reviewed inspections records and verified that inspections are conducted in a consistent manner.

Detour has developed and implemented a management of change (MoC) process (procedure DLM-IMS-006 "Risk and Chang Management") for operational changes in the plant to ensure that a systematic process is followed to evaluate changes at process facilities so that potential negative impacts to health and safety of employees and the environment are minimized. The MoC process is to be used to evaluate proposed changes to: equipment, materials, processes, systems and work management procedures. The MoC uses a format that includes a description of the proposed change, a risk assessment section, review, evaluation, and approval. Environmental and Health and Safety areas have a section to sign off on the MoC. Examples reviewed include signatures of both areas where relevant. The management of change process is used in a consistent manner by Detour process area. Examples of management of change were reviewed for the recertification period including change of WAD cyanide target in final tails during summer months in 2021 and seasonal WAD cyanide set point in 2022; change of cyanide braided lines in the cyanide mixing area; detox overflow pipe redirection in final tails berm; among others. The completed forms were signed off by process, environmental and safety staff.

Detour has implemented contingency procedures for the process plant and tailings facilities to respond to upsets in water balance, problems identified by monitoring and inspections, and to address temporary closure or cessation of the facilities. Procedures include step-by-step measures for stopping and starting the plant facilities, events of a power outage, provide response measures for emergencies related to failures of cyanide equipment, and response plans to address upsets in the process water balance. Section 8 of the OMS Manuals for Cell 1 and Cell 2 include contingency scenarios and emergency response situations related to water management at the TMA and associated facilities. Detour has several manuals, procedures and checklists for the safe operation of cyanide facilities. These documents include actions to be taken to regain control of the operation in case of upset conditions identified during cyanide facilities monitoring and inspections. Procedures that address these scenarios include: PPO-SOP-1.6.4 "Responding to Detection of High HCN Gas and or Cyanide Solution Leaks"; PPO-SOP-1.38.0 "Reacting to HCN Gas Measurements"; PPO-SOP-11.3.5 "Managing of High CN WAD in Detox Discharge". In case of power outages, Detour has the SOP-ELE-183-001 "Emergency Outage plan"; SOP-ELE-830-001 "Process Plant Emergency Power Startup or

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Power Failure” (for process plant generators); SOP-ELE-183-002 “Bringing TPP generator station online” (for TMA and seepage ponds generators); SOP-ELE-183-004 “Bringing LHL Generator station online” (for TMA and seepage ponds generators). In addition, section 3.6.11 of the OMS manuals also includes activities related to surveillance of the tailings corridor and actions to be taken in case of a tailings line rupture. Detour has implemented an emergency pond close to a natural water course to contain any leakage from the upper portion of the tailings pipeline. The lower portion will flow into the secondary containment of the process plant, which can also contain any potential spill from the process tanks.

In relation to a temporary closure or cessation of operations scenario, actions to be taken are described in the Closure Plan, which latest version will be filed in late 2022 / early 2023 for approval by the authorities. Section 7 of the plan describes rehabilitation measures in case of a temporary suspension of activities and Section 8 describes rehabilitation measures in a state of inactivity. Activities to be implemented in case of a temporary suspension of activities include ongoing water treatment and discharge, retaining enough personnel on site including health and safety and environmental staff, and conducting routine inspections and maintaining records of these inspections. Monitoring will continue as per the conditions of existing permits and agreements. The site inventory of all chemical products (including cyanide), hydrocarbons, explosives and hazardous wastes will be updated. All storage facilities containing any such materials will be appropriately secured and monitored for leakage and/or damage as part of regular site inspections. Activities to be implemented in a state of inactivity include locking or fencing entrances to buildings and other structures present on the site, as appropriate. Potentially unsafe areas will be posted with appropriate signage to warn of potential site hazards. Personnel will carry out general site inspections on a periodic basis with the frequency to be determined based on the activities on site at the time. Records of these inspections will be maintained. The TMA will continue to operate in accordance with the requirements of associated environmental approval(s) during a State of Inactivity and will be inspected by site personnel on a regular basis to ensure structural integrity (especially after storms, and during and following the spring melt period), as well as through regular structural inspections. All petroleum products and chemicals (including cyanide) not required on a regular basis for site maintenance will either be removed from the site in accordance with applicable regulations and/or environmental approvals; or will be fully documented and stored in a safe and secure location to be regularly monitored by personnel when on site. The frequency of site inspections will vary depending on the status of the mine at the time that the State of Inactivity occurs (i.e., during ongoing operations or at some stage during closure).

Tanks holding cyanide solutions are inspected every shift for structural integrity and signs of corrosion and leakage as part of the inspection program conducted by Process personnel. Inspection reports for the recertification period were sampled and found to be complete. Detour started in 2019 a program to conduct non-destructive tests to all process tanks including the cyanide mixing and distribution tanks, leach, CIP and barren tanks. Non-destructive tests have been conducted at all tanks. Secondary containments for tanks containing cyanide solution are also inspected every shift for integrity and capacity. The pre-detox thickener and the pre-leach

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thickener tanks are located outdoors, but drain to additional containment areas beneath them, in the basement of the process plant building. The detox tanks are also outdoors, but the secondary containment is connected to the process plant secondary containment. None of the containment areas has any drains to the adjacent land surface. Pipelines, pumps and valves in the process plant, milling facilities, cyanide mixing area, and TMA are inspected every shift for deterioration and leakage. Inspection forms were verified for the inclusion of items related to deterioration and leakage of pipes, pumps and valves. The auditors reviewed completed inspection forms for the recertification period and found them to be complete. Non-destructive tests of the cyanide addition lines to the leach tanks were also available for review by the auditors. The TMA is inspected for critical aspects including integrity of dam, available freeboard and physical integrity of surface water diversions. Historical freeboard at the TMA was reviewed and verified that it was managed according to its design criteria. WAD cyanide levels are also monitored on a monthly basis.

Records of inspections are retained and were reviewed by the auditors. The inspections are documented and include the date of the inspection, the name of the inspector and observed deficiencies. Inspection forms are reviewed and signed by the supervisor to ensure good quality of inspections. The inspection program also includes cyanide offloading, mixing and storage facilities. Detour has two mechanisms to document, track and close corrective actions identified during inspections: i) Corrective actions that are related to maintenance of equipment at the process plants and TMA are managed by the Maintenance area. These corrective actions are managed using SAP system, where work orders are tracked, prioritized, planned and closed. The auditors verified that corrective actions related to cyanide facilities were prioritized for prompt implementation. ii) All other corrective actions not related to maintenance of equipment that are identified through inspections conducted by Process personnel or other areas (e.g. Environment) are tracked in a software (e-compliance), implemented and followed up until closure. The auditors reviewed examples of items identified during inspections and records of the implementation of the corrective actions until they were closed.

The Maintenance area has a preventive maintenance program for pumps, pipelines, valves, flow meters, gauges, level sensors, pH meters, sump pumps, filters, HCN sensors, tanks, seepage ponds, and cyanide facilities in general. The preventive maintenance program helps perform periodic maintenance and inspections of the integrity of process equipment, piping and tanks to ensure they are working properly. Detour develops a weekly plan for preventive and corrective maintenance using SAP software. Preventive and corrective maintenance plans are generated automatically for each week. Work orders generated from inspection forms are entered in the system, including assigned priority.

Detour receives electricity from the public grid to run its operations. Detour operations require 98 megawatts (MW) for the entire site. There are four emergency power generators at the plant: Two 2 MW backup generators for larger equipment at the process plant; and two 1.5 MW backup generators. The two 1.5 MW generators will start automatically as soon as there is a power outage and cover critical equipment such as pumps, tank agitators, sumps, tailing pumps, fire

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alarm panels, evacuation alarms, HCN monitors, among others. The other two 2 MW generators would be started manually. For the TMA and seepage collection ponds there are three generators (two of 2MW and one of 1.2 MW). These generators were commissioned in the summer of 2022 and will be included in the preventive maintenance program in SAP. In addition, 10 small portable generators are in standby for transportation to the TMA and seepage locations around Cell 1 and Cell 2. Detour provided examples of preventive maintenance records for the backup power generators at the process plant. A review of these records confirmed that the generators are checked on a monthly basis for fuel level, lighting, heating and are also start-tested. These inspections would trigger a corrective maintenance work order, if required.

4.2 Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 4.2

Discuss the basis for this Finding/Deficiencies Identified:

Detour conducts programs to determine the appropriate cyanide addition rates in the process plant and adjust addition rates as necessary. Detour concluded that the optimal set point for cyanide at the plant was between 160 and 190 mg/l free cyanide. These cyanide addition targets can be set for each independent leach train and adjusted based on mineralogy of the ore. Cyanide addition at each of the 4 leach trains is controlled independently using TAC 1000 online analyzers. Samples are taken every 15 - 20 minutes from Tank #1 of each train and analyzed for free cyanide. If values are below 150 or 160 mg/l free cyanide it will automatically adjust the pumps accordingly and add more cyanide to the system. Operators also take samples each shift as reference. The cyanide set points are reviewed every day and adjusted accordingly using the samples taken by the operators. Detour also adds lead nitrate to the process circuit (range 60 - 100 grams/ton) to attack the sulfides, increase the extraction rate, and decrease the amount of cyanide that is used in the process. This also helps generate lower values of WAD cyanide to be treated at the detox process. Currently, cyanide is added at Leach Tank #1 for each of the four leach trains. There is also the capacity to add cyanide to Leach Tanks #2, #3 and #5; although they have not been used for the recertification period. Cyanide is also added at the barren solution tank and at the Intensive Cyanidation Solution tank.

4.3 Implement a comprehensive water management program to protect against unintentional releases.

- The operation is: in full compliance
 in substantial compliance

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not in compliance with Standard of Practice 4.3

Discuss the basis for the Finding/Deficiencies Identified:

Detour continued using a comprehensive, probabilistic water balance using the Monte Carlo simulation software, Goldsim. This model is used for estimation of short-term projects, continuing operations at the process plant, and for mine closure. An external consulting company (BGC Engineering Inc, then Palmer, and now SRK) updates climate data on a monthly basis and calibrates the model twice a year. Detour has been using this water balance model since 2016. The water balance includes the following factors: solution application rates; tailings deposition rates; precipitation, evaporation, and seepage rates; undiverted run-on from upgradient areas; and impacts of freezing and thawing. Potential power outages are not included in the water balance as Detour has emergency backup generators on site which will avoid any effects on water balance activities. Detour has zero process water discharges to surface waters. A description of the water balance model and calculations is included in the Goldsim Water Balance and Water Quality Model, prepared by Palmer consultants, dated August 2021. This document is updated when there is a major model update.

The Goldsim Water Balance and Water Quality Model, dated August 2021, considers tailings deposition rates into the TMA, which are included on a monthly basis in the model. A bathymetric survey is conducted twice a year at the TMA pond to evaluate consolidation of the tailings. The water balance uses an Environmental Design Flood (EDF) event of 431mm of direct precipitation in Cell 1 and 478mm for Cell 2, corresponding to a spring run-off event of duration 30 days and frequency 1:100 years. The TMA dams allow for a freeboard to contain the EDF without any discharge to the environment. As such, at no point in time must the maximum operating water level exceed the EDF freeboard allowance. The maximum operating water level in Cell 1 and Cell 2 TMA is 0.5 meters and 2.5 meters below the spillway, respectively, to ensure the environmental design storm (EDF) can be contained with no discharge through the spillway. The TMA is operated as a zero direct discharge facility. The model uses weather data from a weather station located at the mine site (Detour Lake Mine weather station) and 4 external stations with data covering the period between 1926 and 2022. The Detour Lake Mine Weather station measures the following parameters: wind speed and direction, temperature, relative humidity, solar radiation, precipitation, and snow depth. Evapotranspiration is estimated using total radiation and average ambient air temperature. The weather station is run by an external contractor (Rotek) and is calibrated every year. In addition, Detour has two rain gauges as back up, in case the main weather station fails. The TMA is located and constructed in such a way that it does not receive surface run-on from up-gradient watershed. The TMA only receives water through rainfall and snow that falls directly in the decant pond and beaches of the TMA. This water input is included in the model. The water balance model takes into account conditions of freezing and thawing within the TMA. This variable becomes critical to manage potential water shortages during the winter season. The model does not consider solution losses in addition to evaporation as the TMA operates as a closed circuit. Seepage from the toe of the TMA is collected and pumped back to the decant pond. The model also considers water losses related

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to unrecovered seepage not captured by the seepage pumping systems. The model does not include the effects of potential power outages as Detour have emergency backup generators on site which will avoid any effects on water balance activities. The potential scenario of overflow contingencies due to power outages are unlikely to occur. There are no solution discharges to surface waters.

Detour conducts frequent inspections to the TMA and monitoring activities to ensure these facilities are operated according to the design criteria, following the inspection program included in the OMS manuals. Process operators conduct daily inspections on the TMA, including conditions of dams and seepage ponds. The auditors reviewed inspections records and verified that inspections to the TMA facilities are conducted in a consistent manner. Freeboard in the TMA is surveyed on a monthly basis. The auditors reviewed data for the recertification period and verified that 0.5 and 2.5 meters of freeboard was maintained at all times in Cell 1 and Cell 2, respectively. A bathymetric survey is conducted twice a year at the TMA pond, to evaluate consolidation of the tailings. The engineer of record also conducts an annual inspection of the TMA.

The water balance uses an Environmental Design Flood (EDF) event of 431mm of direct precipitation in Cell 1 and 478mm for Cell 2, corresponding to a spring run-off event of duration 30 days and frequency 1:100 years. The TMA dams allow for a freeboard to contain the EDF without any discharge to the environment. As such, at no point in time must the maximum operating water level exceed the EDF freeboard allowance. The maximum operating water level in Cell 1 and Cell 2 TMA is 0.5 meters and 2.5 meters below the spillway, respectively, to ensure the environmental design storm (EDF) can be contained with no discharge through the spillway. The auditors reviewed data for the recertification period and verified that 0.5 and 2.5 meters of freeboard was maintained at all times in Cell 1 and Cell 2, respectively.

Detour has a weather station on site that collects precipitation data on a daily basis. This weather station has been in operation since 2012. Data collected is used to compare the results to design assumptions and to calibrate the water balance model. The water balance model is updated and calibrated every six months using precipitation, decant pond levels and temperature data, as mentioned in the Goldsim Water Balance and Water Quality Model, dated August 2021. The water balance model has not indicated any need to revise the design assumptions or operating practices for the recertification period. Current on-site measurements in general correlate well with the initial assumptions of the water balance. The water balance projections are revised as necessary based on actual data, such as bathymetric surveys and flows collected in the seepage ponds. The auditors reviewed on-site meteorological monitoring data. Detour maintains the information in an Excel spreadsheet, which is then uploaded into Goldsim on a monthly basis.

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4.4 Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 4.4

Discuss the basis for the Finding/Deficiencies Identified:

Detour does not operate the TMA or other areas of open waters with WAD cyanide concentrations above 50 mg/l. The tailings impoundment decant pond is maintained well below the 50 mg/l WAD cyanide. The OMS Manuals indicate a maximum WAD cyanide concentration criteria of 50 mg/l at the tailings decant pond. In addition, the OMS Manuals specify an operating target of 35 mg/l WAD cyanide in the tailings leaving the detox system. Detour has conducted a Management of Change process to adjust the WAD cyanide target in final tails during the summer months. Procedure PPO-SOP-11.3.5 "Managing of High CN WAD in Detox Discharge" allows for WAD cyanide levels between 42 mg/l up to 100 mg/l in the tails exiting the detox system, but always meeting the maximum WAD cyanide concentration of 50 mg/l at the decant ponds. As mentioned by process personnel interviewed, the cyanide levels in the tails continue to decrease throughout its transit in the pipeline corridor until it discharges in the TMA. The auditors reviewed WAD cyanide concentrations at the TMA decant ponds in Cell 1 and Cell 2 for the recertification period and found that all the values were below 50 mg/l, being 27.9 mg/l the highest value reported.

Water quality at the decant pond is monitored on a monthly basis for WAD cyanide. A review of monitoring results of TMA Cell 1 and Cell 2 decant solutions for the recertification period indicated a maximum WAD cyanide concentration of 27.9 mg/l (one-off event) and an average of 2.09 mg/l. Detour does not take samples at the spigots and in the water flowing across the beach area prior to entering the decant pond. Detour has procedure ENV-SOP-1.00.00 "Deterrent Cannon Installation Procedure" which provides details for safe operation of bird cannons, which are most actively used for scaring away birds and other wildlife from getting too close to active tailings deposition areas in the Tailings Management Areas; however, these hazing techniques are not considered adequate as a stand-alone control to meet this Standard of Practice because they are usually ineffective for long-term wildlife deterrence. Detour needs to conduct sampling at the discharge point to the tailings storage facility (e.g., at the spigots) to demonstrate that WAD cyanide values during the summer months are maintained below 50 mg/l; and, depending on the analytical results, implement alternative compliance measures as needed. This action is included as part of a Corrective Action Plan (CAP) for Detour Lake mine. There have been no wildlife mortalities related to cyanide management in the TMA facilities for the recertification period.

Since the start-up of the operations, Detour has been successful at preventing wildlife mortalities related to cyanide facilities. The WAD cyanide values are well below the recommended value of

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50 mg/l. Reported values in the TMA decant pond indicate a maximum WAD cyanide concentration of 27.9 mg/l (one-off event) and an average of 2.09 mg/l. Considering the low WAD cyanide concentrations in the TMA, formal inspections for wildlife mortalities are conducted on a weekly basis by the Environmental department. Detour does not maintain a specific wildlife mortality register but has a procedure on how to report them and has individual reports on wildlife mortalities. The auditors sampled the individual wildlife mortalities reports and there were no mortalities related to cyanide.

4.5 Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 4.5

Discuss the basis for the Finding/Deficiencies Identified:

Detour does not have direct discharges to surface water from cyanide facilities. Detour operates with zero discharge of treated process solutions. Current water treatment facilities at Detour are related to pit dewatering.

The design of the TMA did not consider a liner at the bottom of the facility. The TMA is designed to seep water through the toe of the dams. Seepage from the TMA is collected and contained in seepage ponds and pumped back to the decant pond. There are 6 seepage ponds around TMA Cell 1 dams and 4 seepage ponds around TMA Cell 2. Water quality data from the 10 seepage ponds at Cell 1 and 2 is monitored to detect presence of cyanide. For Cell 1, WAD cyanide values reported for the recertification period reached a maximum level of 0.4 mg/l and an average of 0.09 mg/l. Values for free cyanide for the same period reached a maximum level of 0.289 mg/l and an average of 0.07 mg/l. The highest values recorded correspond to seepage pond #3. For Cell 2, WAD cyanide values reported for 2021 and 2022 reached a maximum level of 0.142 mg/l and an average of 0.03 mg/l. Values for free cyanide for the same period reached a maximum level of 0.106 mg/l and an average of 0.025 mg/l. The highest values recorded correspond to seepage pond #1. There are ten surface water monitoring stations downgradient of the TMA. Monitoring results for these stations are reported to the authorities. Detour detected traces of some parameters associated with tailings such as cobalt and free cyanide (0.005 mg/l) in monitoring station ERC4. To control this, trenches and collection systems were implemented to pump back any potential seepage and control the water quality at ERC4. The auditors reviewed monitoring data for the recertification period for ERC4. Maximum free cyanide value reported for the period was 0.017 mg/l, which is below the 0.022 mg/l free cyanide value of the Code. Detour considers that the plume has been effectively controlled as indicated by values reported in monitoring station ERC5, located downgradient of ERC4.

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4.6 Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 4.6

Discuss the basis for the Finding/Deficiencies Identified:

The process plant is designed and operated to manage seepage and protect groundwater quality. The entire process area, including the cyanide mixing area, is contained within a reinforced concrete pad surrounded by curbs, parapets, and stem walls, which provide a competent barrier to seepage. The concrete floor is sloped to drain solution into common sumps and then pump the solution back into the process circuit. All process tanks at the plant are secured to solid, reinforced concrete pedestal-type foundations and are contained within concrete berms with good condition concrete flooring. This foundation and floor system serves to prevent any seepage from the tank bottoms from entering the ground. The main facility that may contribute to seepage is the TMA. The TMA is unlined and was designed and constructed to be a flow through facility. There are 6 seepage collection ponds in Cell 1 and 4 seepage collection ponds in Cell 2 around the TMA that collect and pump seepage water back to the decant pond. In addition, there is a groundwater monitoring network around the TMA: 16 groundwater stations around TMA Cell 1, and 8 groundwater stations around Cell 2. Each station has both a deep and a shallow well (47 wells in total, as one station only has one well). Monitoring well MW11-07, which is located in the same areas as surface water station ERC4 discussed above in 4.5, reported a maximum of 0.011 mg/l free cyanide in 2019. The values have decreased since then as a result of the additional controls implemented for ERC4. WAD cyanide at MW11-07 was reported at 0.004 mg/l for the recertification period. Monitoring well MW11-23 reported cyanide traces (0.183 mg/l WAD cyanide) that are coming from the TMA. Additional wells have been installed and a study was conducted to better understand the extent of the plume and install a pump back station. Detour is currently defining a model to determine how much groundwater can be pumped to control the plume without impacting natural surface flows in the adjacent creek. No groundwater is currently being pumped until a permit is obtained. In addition, monitoring wells MW92-4 and MW13-18 (both are in the same location) also show some WAD cyanide traces (0.014 mg/l), which are assumed to be influenced by legacy operations of the previous owner of the mine. Detour has installed additional monitoring wells to characterize the area. Pumping facilities will be installed in 2023 to control the plume. All the stations that show cyanide traces are in relation to TMA Cell 1.

The Canadian government has not established a WAD cyanide standard in groundwater. In addition, groundwater in the area does not have a defined beneficial use as there are no communities located closer to the mine. Detour has implemented an adaptive management approach for groundwater. Anytime a parameter is above 10 times the provincial water quality

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objective (PWQO), an investigation is initiated to determine additional mitigation measures. The PWQO for free cyanide in surface water is 0.005 mg/l. Groundwater monitoring reports are submitted annually to the authorities in the first/second quarter of the following year, including the wells around the TMA. The auditors reviewed the 2021 report and cyanide concentrations in groundwater, which are generally below 0.022 mg/l free cyanide, with the exception of monitoring well MW11-23 which had a WAD cyanide concentration of 0.183 mg/l (assuming a relation of 2:1 between WAD cyanide and free cyanide).

4.7 Provide spill prevention or containment measures for process tanks and pipelines.

The operation is: in full compliance

in substantial compliance

not in compliance with Standard of Practice 4.7

Discuss the basis for the Finding/Deficiencies Identified:

Spill prevention and containment measures are provided for cyanide mixing, distribution, and process solution tanks. The cyanide mixing and distribution tanks, barren tank, Intensive Leach Reactor (ILR) tank, CIP tanks, leach tanks, pre-detox thickener tank, pre-leach thickener tank and detox tanks are all within an interconnected concrete secondary containment which is in good condition and provides a large containment area. All containments surrounding the plant drain into the plant secondary containment, which is the lowest point. Arrangements remain unchanged since the initial certification audit. The entire process area is contained within a concrete pad surrounded by curbs and walls, providing a competent barrier to seepage. The concrete floor is sloped to drain to concrete trench drains, where any spills will be pumped back to the process. The sump pumps are included in the preventive maintenance routes. The secondary containment systems are inspected daily as part of the process facilities inspection system. The auditors observed that the concrete containment systems were in good condition at the time of the audit.

As stated in the initial certification audit, secondary containments for cyanide unloading, storage, mixing and process tanks are, in general, sized to hold a volume greater than that of the largest tank within the containment (i.e. 110%) and piping draining back to the tank with additional capacity for the design storm event. All secondary containments are connected to provide a larger containment capacity for process solution within the process plant, especially for those tanks that do not have a secondary containment capacity to contain 110% of the volume. According to the report "Cyanide Unloading/Distribution and Related Facilities" dated October 2018, prepared by Porcupine Engineering Services INC (PES), the secondary containments of the following tanks do not have a capacity of 110% of the largest tank, and therefore rely on the larger containment area of the process plant for the remaining portion: Cyanide mixing and distribution tanks: containment has 35% capacity of the largest tank; Barren tank: containment has 80% capacity of the tank; Detox tanks: containment has 18% of the required volume.

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Secondary containments for tanks containing cyanide solution are also inspected every shift for integrity and capacity. The pre-detox thickener tank and the pre-leach thickener tank are located outdoors, but drain to additional containment areas beneath them, in the basement of the process plant building. The detox tanks are also located outdoors, but the secondary containment is connected to the process plant secondary containment through three flaps in the wall of the process plant. The cyanide mixing and distribution tanks are located within a bermed concrete impoundment, which were observed to be of sound integrity and considered suitable for containment in the event of a release or tank failure. The containment area has a sump pump to transfer any solution to final tails. The berms and containment areas are also subject to daily inspections at the beginning of each shift. The entire process area is contained within a concrete pad surrounded by curbs and walls, providing a competent barrier to seepage. The concrete floor is sloped to drain to concrete trench drains, where any spills or rainwater will be pumped back to the process. The auditors observed that the secondary containments were maintained empty, with no materials stored inside them, with the exception of slurry present in the leach tanks containment area, but the quantity did not compromise the capacity of the containment.

Detour has dedicated pumps within secondary containment collection areas that remove solutions and return them into the process circuit. The pumps have automatic level sensors to keep the secondary containments free of water. The automatic pumps are included in the preventive maintenance program. There is no discharge of cyanide-containing water from the secondary containment areas as the secondary containments are not designed to discharge into the environment. As stated in the Code, no specific written procedures are necessary as the containment systems have sumps and dedicated pumps and piping to return solutions to the production process.

Detour has implemented spill control and/or containment measures for cyanide process solution pipelines to collect leaks and prevent releases to the environment. All cyanide pipelines at Detour are located within a secondary containment provided for at the process plant and milling circuit. No pipelines are located outside of containment. There are no buried pipelines. Cyanide pipelines are inspected daily as part of the routine inspections by plant personnel. Cyanide pipelines at the cyanide mixing area are inspected on a daily basis as part of the routine inspections by plant personnel and are also included in the preventive maintenance program. Non-destructive tests of the cyanide addition lines to the leach tanks were also available for review by the auditors. The drainage system from the plant area directs all meteoric water to the west pond and sediment pond #2, where any cyanide solution spill would be collected and pumped back to the process. These ponds represent an additional contingency measure in addition to the existing secondary containment systems of the process plant facilities. In case cyanide solution overflows outside of the plant containment systems due to an upset condition, it would be captured at these two ponds. At the tailings pipeline corridor, Detour has implemented an emergency pond close to a natural water course to contain any leakage from the upper portion of the tailings pipeline. The lower portion will flow into the secondary containment of the process plant, which can also contain any potential spill from the process tanks. In addition, the pipelines in the tailings corridor are wrapped with plastic liners to prevent any high pressure releases

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outside of containment and has implemented conductivity probes to check if there is any tailings leaks below the liner covers. There are video cameras (with infrared) that are installed along the tailings pipeline corridor and are checked by a security guard every 30 minutes.

At Detour there is only one pipeline that could pose a risk to surface water and is the tailings pipeline corridor that crosses Easter creek. The tailing pipelines have a plastic liner on top to prevent any eventual spraying outside the containment area. It also has conductivity probes to check if there is any tailings leakage below the covers. An emergency pond was implemented close to the creek to direct any potential spill from the upper part of the tailings containment area (canal) and avoid impact to surface waters. The emergency pond has two pumps to evacuate any water collected in the ponds. As indicated by Detour, this pond has not received water since it was constructed. The pumps at the emergency pond are included in daily inspections conducted by process personnel.

All cyanide tanks and pipelines at the Detour process plant, milling circuit and TMA are constructed with materials compatible with cyanide and high pH conditions. They are made of carbon steel, stainless steel, HDPE or other materials compatible with cyanide. All tanks and pipes were well supported and in good condition. The hoses for connection to the isotank were changed in 2022 from a braided hose to a hose of Ultra-high molecular weight polyethylene (UHMWPE). This hose was recommended by Draslovka, the cyanide producer, who verified that the material is adequate for cyanide and high pH conditions.

4.8 Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 4.8

Describe the basis for the Finding/Deficiencies Identified:

As stated in the initial certification audit, Detour process plant facilities were constructed by AMEC. Quality control and quality assurance (QA/QC) programs have been implemented during the initial construction of cyanide facilities at Detour; however, the complete records of the QA/QC reports were not available to review by the auditors during the site visit. Site personnel interviewed during the audit indicated that they were present during construction of the facilities and stated that a QA/QC program was followed, however, there was no evidence to back up this statement. QA/QC records were available for the cyanide mixing and distribution area. The cyanide mixing system, including a cyanide mixing and cyanide distribution tanks, was designed by Berlie Falco Technologies. A complete set of design drawings for the cyanide mixing system was available for review by the auditors. These drawings are properly stamped by a Certified Professional Engineer Registered in the Province of Ontario. No additional QA/QC records were

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available during the audit for the rest of the cyanide facilities including the process plant, tailings pipeline corridor and the Cell 1 of the TMA area. In order to be in compliance with the requirements of the Code, Detour has provided an alternate demonstration of QA/QC programs, which is discussed below.

Detour has implemented QA/QC programs for new cyanide facilities constructed during the recertification period. New facilities constructed since the initial certification audit include TMA dam Cell 1 Stage 8 which was commissioned in 2020; TMA dam Cell 2 Stage 1, commissioned in 2021; and TMA dam Cell 2 Stage 2 commissioned in 2022. A new TMA pipeline corridor going to Cell 2 was constructed during the recertification period; however, there were no QA/QC records available for review by the auditors in relation to earthworks, liner installation and fusion of the pipelines for this new cyanide facility. Detour needs to provide evidence of QA/QC records for this facility or retain an appropriately qualified person to inspect this new section of the pipeline corridor and issue a report concluding that the continued operation within established parameters will protect against cyanide exposures and releases. This action is included as part of a Corrective Action Plan (CAP) for Detour Lake mine.

As Detour was not able to provide evidence of the QA/QC activities conducted during construction of cyanide facilities prior to the initial certification audit, nor as-built certifications for cyanide constructions; consultant Porcupine Engineering Services (PES) was retained to conduct a review of cyanide facilities and issued a report that would provide assurance that the continued operations within established parameters will provide protection against cyanide exposures and releases. Detour provided to the auditors the report "Cyanide Unloading/Distribution and Related Facilities" developed by PES, dated October 2018, which addressed the suitability of materials and adequacy of soil compaction for earthworks, such as tank foundations and earthen liners, and for construction of cyanide storage and process tanks. The PES report includes QA/QC programs conducted by EXP/TBT Engineering for suitability of materials and soil compaction for earthworks at the detox tanks. The report also includes as an appendix three reports developed by Golder Associates: "Geotechnical Investigation for the Plant, Accommodation Complex and Airstrips Areas", dated, May 2009; "Complementary Geotechnical Investigation for the Plant Site", dated Feb 2010; and "Complementary Geotechnical Investigation for the Plant Site", dated January 2011. For new facilities constructed during the recertification period, Detour QA/QC programs addressed the suitability of materials and adequacy of soil compaction. The mine maintains files with the QA/QC reports for the TMA Cell 1 Stage 8, and TMA Cell 2 Stages 1 and 2. For cyanide facilities constructed during the recertification period, qualified engineering companies performed the QA/QC inspections and reviews during construction and prepared the final construction reports and as-built drawings certifying that the facilities were constructed in accordance with the design drawings and technical specifications.

As mentioned in the initial certification audit report, Detour was not able to provide evidence of the QA/QC activities conducted during construction of cyanide facilities, nor as-built certifications for cyanide constructions. Consultant Porcupine Engineering Services (PES) was retained to

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conduct a review of cyanide facilities and issued a report that would provide assurance that the continued operations within established parameters will provide protection against cyanide exposures and releases. PES developed the report “Cyanide Unloading/Distribution and Related Facilities”, dated October 2018 that provides an assessment of the infrastructure associated with the sodium cyanide unloading and distribution system at Detour. The objective of the report was to provide an onsite visual engineering review of the cyanide facilities at the process building and that they have been designed and constructed to sound engineering practices, the requirements of the Cyanide Code and relevant codes and standards. The report covered the following cyanide facilities: cyanide isotanks storage area; cyanide offload / mixing and storage / distribution; leach tanks; intensive leach reactor (ILR); CIP Tanks; barren tank; pre-detox thickener; cyanide detox tanks; tailing pipeline to TMA cell 1; cyanide distribution piping; and miscellaneous areas. The PES report was developed by Professional Engineers Mario Colantonio and Eric Villeneuve of Porcupine Engineering Services Inc. Both are registered in Ontario.

The conclusions and recommendations of the PES report are: i) In general the tanks containing cyanide solution and foundations/containment areas are generally in good condition with no obvious signs of distress except for localized areas such as pin holes in various CIP tank shells. In addition the entire mill process building ground floor is approximately 250mm below outside grade, effectively making the entire mill a containment area. ii) Drawings of the foundations and major process vessels bear the seal of a Professional Engineer Registered in the Province of Ontario. iii) A quality control/quality assurance program should also be implemented such as periodic Non Destructive Testing (NDT) of tanks and vessels containing cyanide, especially in high wear areas such as suction and feed nozzles. Inspection of cyanide piping and containment areas should be undertaken as well. In terms of the recommendation in the PES report related to Non-Destructive Testing (NDT) of tanks and vessels containing cyanide, Detour started in 2019 a program to conduct non-destructive tests to all process tanks including the cyanide mixing and distribution tanks, leach, CIP and barren tanks. Non-destructive tests have been conducted at all tanks except for the cyanide distribution tank. The plan is to conduct NDT to all 53 existing cyanide tanks prior to their initial 10 years of life (Detour operations started in 2013). After that, the NDT will be conducted every 3 years. The auditors reviewed NDT reports conducted for the recertification period.

In the case of the TMA facility, the Code requires an evaluation of dam stability as an alternative engineering review of tailings storage facilities. The auditors reviewed the report “Detour Lake Mine TMA Cell 1 Dam Safety Review”, developed by Golder Associates, dated April 2016 and a follow up report titled “Dam Safety Review” developed by AMEC in 2017. The purpose of the report is to confirm that the existing dams are safe and are being operated and maintained in safe manner and that there is a surveillance program that is capable of detecting unsatisfactory or potentially unsafe conditions. The report concludes that the dams are being maintained and that the site is being operated in a safe manner in accordance with the existing protocols. It is the professional opinion of the auditors that the alternative evidence presented by Detour complies with the requirements of Standard of Practice 4.8 of the Code.

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4.9 Implement monitoring programs to evaluate the effects of cyanide use on wildlife, and surface and groundwater quality.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 4.9

Describe the basis for the Finding/Deficiencies Identified:

Detour has an Environmental Monitoring Plan for surface water dated August 2022, and an Environmental Monitoring Plan for groundwater dated June 2022. These plans include details related to monitoring locations for surface and groundwater, frequency of samples and parameters to be analyzed, including cyanide species (total, free and WAD cyanide), QA/QC, data analysis and reporting. Detour also has the procedure ENV-SOP-05 "Surface and Ground Water Sampling Procedure", dated May 2022 that addresses monitoring requirements related to surface water and groundwater including responsibilities; equipment; field notebook to report field data (i.e. pH, conductivity, temperature and dissolved oxygen); surface/groundwater pre-sampling procedures (i.e. labels, preservatives, field instrument calibration); sampling procedures (surface and groundwater, field parameters); post-sampling procedures (i.e. filtration, preservation), quality assurance/quality control (i.e. duplicate, field blanks, travel blanks, trip spikes), sample storage (i.e. maximum holding times for samples); training requirements; and, chain of custody and shipping. This procedure includes a section specifically for cyanide sampling and provides details on how to take samples in cases where the monitoring stations have historically presented high concentration of sulfates, which could interfere with cyanide lab analysis. Detour does not have a specific written procedure for wildlife monitoring activities. There is procedure ENV-SOP-1.00.00 "Deterrent Cannon Installation Procedure" which provides details for safe operation of bird cannons, which are most actively used for scaring away birds and other wildlife from getting too close to active tailings deposition areas in the Tailings Management Areas. Water monitoring activities are conducted by Environmental department personnel. Samples are sent to TestMark Laboratories in Timmins, which is ISO17025 certified.

The Environmental Monitoring Plan for surface water, and the one for groundwater were developed by Wood consultants in conjunction with Detour Environmental Manager. These professionals have more than 20 years of experience in environmental matters in mining and water monitoring. The surface and groundwater sampling procedure were developed internally by qualified personnel of Detour's environmental department. Staff in charge of preparing the sampling procedure are suitably qualified, with more than 20 years of experience in environmental management in mining activities. Analytical protocols for environmental samples are provided by Test Mark laboratories in Timmins.

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The surface and groundwater sampling procedure includes protocols on how and where the samples should be taken, preservation techniques, equipment calibration, quality assurance / quality control requirements, chain of custody procedures, shipping instructions, and cyanide species to be analyzed. Examples of completed chain-of-custody records showing proper use of the forms were reviewed. Maps showing the monitoring locations with respect to cyanide facilities were also reviewed by the auditors.

Detour field data sheets for surface and groundwater samples record in writing the weather conditions, ambient temperature, field parameters (i.e. conductivity, pH, temperature, dissolved oxygen), groundwater levels and quantity of water to purge. During sampling, pictures are taken for each location visited. Completed monitoring field forms were reviewed by the auditors and verified that these conditions are being registered.

Detour Environmental Monitoring Plans and the surface and groundwater sampling procedure are reviewed every year and updated as necessary. The monitoring schedule includes frequencies for samples that vary between monthly, quarterly, and biannually and annually. The frequencies have been defined based on local regulations and permits requirements. Records were available and reviewed by the auditors for sampling and monitoring activities. The frequencies of the monitoring activities were deemed to be appropriate by the auditors. It is the professional opinion of the auditors that Detour conducts wildlife monitoring at frequencies adequate to identify any issues and implement changes in a timely manner.

5. DECOMMISSIONING: Protect communities and the environment from cyanide through development and implementation of decommissioning plans for cyanide facilities.

Standards of Practice

5.1 Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife, livestock, and the environment.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 5.1

Describe the basis for the Finding/Deficiencies Identified:

Detour has an approved Closure Plan Amendment 2.1 dated August 2021. An updated version of the Closure Plan (Amendment 3) is currently under development and will be submitted in late 2022/early 2023 for approval by relevant government agencies. Both versions of the closure plan

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include the requirements of the Cyanide Code, as well as references on decommissioning activities that will be conducted. The current life of mine is until 2042. Detour has developed a conceptual plan for Decommissioning of Cyanide Facilities, dated January 2019, that describes the procedures to decommission cyanide facilities at the cessation of operations. This conceptual plan will be updated together with Closure Plan Amendment 3. This plan has been developed internally, led by the Environmental department with support from other functions of the operation, and includes activities such as decontamination of equipment, neutralization of process solution, and management of surface water. The plan considers decontamination activities. In addition, Closure Plan Amendment 3 includes removal of residual cyanide reagents and pumping of groundwater to manage plumes coming out of the TMA. The plan considers that TMA Cell 1 and Cell 2 will be closed progressively. Cell 1 to start closure activities in 2024, Cell 2 in 2032 and the rest of the cyanide facilities at the end of the operations. Post closure decommissioning activities, including the process plant, is expected to take three to five years to completion. The FROSKR Technical Memorandum dated June 2022 "Detour Lake Mine Buildings Demolition Cost Estimate" includes demolition and decontamination cost estimates for tanks, pipes, pumps, tailings pipelines, water pumping costs, among others. Cost estimates were calculated using third-party rates. Decommissioning activities include all the necessary steps to bring the facility's components to a safe, chemically stable condition, such that they do not present a risk to people, wildlife, or the environment due to their cyanide content.

The Closure Plan Amendment 3 and the closure cost estimate includes a general implementation schedule, which will continue being refined as Detour approaches the closure period. Decommissioning and reclamation activities for TMA Cell 1, Cell 2 and Cell 3 are scheduled to take place during the life of mine, beginning year 2024 for Cell 1, and 2032 for Cell 2. Decommissioning activities for TMA Cell 3 are expected to take place over a three-year period following mine closure. Decommissioning of the process plant and its ancillary facilities is scheduled to take place in the first three years following mine closure. The process plant and associated pumps, piping, vessels, and other ancillary equipment will be dismantled, decontaminated, and removed. Exposed concrete will be decontaminated and demolished to within 1 meter of final ground surface, infilled with Non-Acid Generating rock or overburden if needed, and covered with overburden to support revegetation.

Detour has an internal commitment to update the Closure Plan every 5 years, including decommissioning activities. This commitment is included in Section 2.3 of the plan for Decommissioning of Cyanide Facilities, dated January 2019. There is no regulatory requirement to update the plan on a certain frequency, unless there is a material change in the mining facilities. During the recertification period, Detour updated the closure plan three times: Amendment 2 in 2019, Amendment 2.1 in 2021, and Amendment 3 in 2022. In addition to that, Agnico Eagle Gold corporate office requires its operations, including Detour, to review and update its Asset Retirement Obligation (ARO) cost estimation for the mine, including cyanide facilities decommissioning costs. These costs are reviewed and updated every quarter and submitted to the corporate office, where it is audited financially by an external party.

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5.2 Establish a financial assurance mechanism capable of fully funding cyanide-related decommissioning activities.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 5.2

Describe the basis for this Finding/Deficiencies Identified:

Detour has developed an estimate of the cost to fully fund third party implementation of the cyanide-related decommissioning measures as identified in the decommissioning plan. The closure cost in Amendment 3 was estimated in Canadian Dollars (CAD\$) 255 million, including decommissioning activities. The FROSKR Technical Memorandum dated June 2022 “Detour Lake Mine Buildings Demolition Cost Estimate” includes demolition and decontamination cost estimates for tanks, pipes, pumps, tailings pipelines, water pumping costs, among others, using third party unit rates. Decommissioning costs for cyanide facilities is estimated at CAD\$ 13.1 million and includes tanks cutting and demolition, demolition of buildings, decontamination, disposal of debris, removal of contaminated equipment, removal of unused chemicals, shipment of residual contaminated soils, removal of tailings pipeline, among others.

Detour has an internal commitment to update the Closure Plan and cost estimates, including decommissioning activities, every 5 years, or more frequently if there are material changes to the mine facilities. There is no regulatory requirement to update the plan on a certain frequency, unless there is a material change in the mining facilities. In addition, Detour Lake Mine updates on a quarterly basis its Asset Retirement Obligation (ARO) cost estimate, including cyanide facilities decommissioning costs, which is reported to Agnico Eagle Corporate Office Financial area. The most recent ARO cost estimate for the third quarter of 2022 is CAD\$ 144 million.

Detour has delivered to the Ministry of Northern Development and Mines of Ontario three Irrevocable Standby Letters of Credit issued by the Bank of Montreal, dated September 2022, for a total of CAD\$ 231.94 million, under the new company name (Agnico Eagle). These letters of credit are automatically extended from year to year. The difference between the guarantee vs. the total closure cost included in Amendment 3 (CAD\$ 255 million) is because it does not include TMA Cell 3 and the north pit, which are not yet developed. Existing facilities are fully bonded under the amount of CAD\$ 231.94 million.

6. WORKER SAFETY: Protect workers’ health and safety from exposure to cyanide.

Standards of Practice

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6.1 Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 6.1

Describe the basis for the Finding/Deficiencies Identified:

Detour has established Standard Operating Procedures (SOP), Operating Guidelines, related checklists and work permits to ensure that worker exposure to cyanide is minimized and/or controlled when performing tasks such as unloading, mixing, plant operations, entry into confined spaces, and equipment decontamination. All these procedures and instructions are detailed for the risks involved with each task and adequately describe safe work practices. These documents also describe detail task specific Personal Protective Equipment (PPE). Work permit systems have been developed for more general activities which apply across various areas of the plant and/or the mine operation. These include, for example, lock out/ tag out/try out, hot work and confined space entry permits. Procedures were reviewed and found to be sufficiently detailed to enable a safe operation and to minimize worker exposure. Verification also included worker interviews while conducting field inspections. During the review of cyanide mixing operations, it was identified that the chemical tubing had recently been installed at the top of the isotainer, as opposed to the braided tubing, indicated in procedure PPO-SOP-10.1.11 "Mixing Sodium Cyanide. This change was reflected in the updated PPO-SOP-10.1.14 that was provided.

The auditor verified that Detour's operating procedures provide a listing of required personal protective equipment (PPE) to prevent and/or minimize worker exposure to cyanide and/or cyanide containing solutions. Pre-start checklists for cyanide mixing within the cyanide containment area were reviewed by the auditor, certifying that operators are required to identify whether they have the required PPE to perform the task at hand and/or identify any upset conditions which may require additional precautionary measures.

Additionally, PPO-SOP-10.1.11 indicates the preparation requirements, which includes filling out a pre-work "TASC" card and ensuring appropriate emergency equipment is available nearby. In the case of cyanide unloading and mixing, personnel have to verify the work area for safety and health hazards, eye wash stations, fire extinguishers, HCN detectors, pre-use equipment checklist and the use of PPE's. After donning the appropriate PPE, the operator must confirm appropriate steps have been taken with the Asset Protection (security) group. Observations during the audit confirmed that hard hat, rubber boots, rubber gloves, chemical suits, face shields, handheld two-way radio, and HCN personal monitors were in use for tasks that were performed at the cyanide mixing area. When conducting maintenance work in

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equipment in contact with cyanide solution, operators also fill out a TASC card, where they should also identify risks and pre-work verifications as the eye wash stations, emergency exits, and to verify the availability of the Cyanide kits.

Detour conducts induction (new workers) and refresher training in Operating Procedures and Work Instructions conducted by a senior Supervisor of the specific area, therefore, there is the opportunity to consider workers' input. Detour uses Peer-to-Peer training in which a competent trainer, identified my management discusses procedures with personnel. During the interaction, Supervisors can identify improvements and recommendations that includes procedures. A Safety Committee conducts group meetings, which include operator representatives, provide the opportunity to discuss procedures. Additionally, Detour follows a Management of Change (MOC) Procedure for making changes and modifications to the plant's operating method, indicated as a Process Change Modification Form (PCMR) and uses it regularly to evaluate changes with respect to cyanide releases and exposures.

The auditor reviewed several Procedures and Work Instructions, identifying that in all cases, these are frequently updated. The auditor also reviewed MOC documents, Peer to Peer training records and Job Safety Analysis and verified worker input related to health and safety aspects. Interviews with medical staff also demonstrated knowledge of first aid procedures for cyanide intoxication.

6.2 Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 6.2

Describe the basis for the Finding/Deficiencies Identified:

Detour has determined different pH levels for cyanide solutions during mixing and production activities as part of their operation philosophy to prevent the generation of HCN gas. PPO-SOP-10.1.11 – "Mixing Sodium Cyanide" describes the distribution of concentrated cyanide solution (30%) from the distribution tank and indicates a required pH value above 11.0 when sparging, mixing and distributing cyanide solution to the plant. To help control pH, barren solution is used to mix and dissolve solid sodium cyanide briquettes in the isotainer and sodium hydroxide is added to rise the pH to the desired value. pH readings are monitored throughout the cyanide preparation is performed. The auditor verified pH probe calibration records and process historian data for 2019, 2020 and 2021 and certify that solution was raised to 11.0 prior to mixing.

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PPO-SOP-1.6.4 – “Responding to Detection of High HCN Gas and Cyanide Solution Leaks” also indicates the pH values where different from pH 11 necessary to limit evolution of hydrogen cyanide gas. This includes a pH range of 7.8-8.5 for the Detox circuit and above pH 12 for the Intensive Leach Reactor circuit.


Detour has established 37 areas where workers may be in risk of exposure to HCN gas, of which the primary concerns are the areas where concentrated cyanide is utilized, including the gravity concentrate leach circuit, each of the leach tank galleries and the electrowinning and stripping circuits. Fixed HCN gas monitors (MSA) are installed in each of the areas. Workers are also required to wear personal HCN monitors (Industrial Scientific). Detour has determined appropriate controls including the use of appropriate PPE. Operating procedures, which specify the PPE required, have been developed and implemented in these areas.

Contingency Procedures in the Process Plant and the Cyanide Emergency Plan indicates that HCN values of 2.5 ppm or above will trigger the first alarm to advise the process work area operators, and 4.7 ppm, or above which requires that all workers will evacuate the immediate area, at least 5m, communicate the levels to the plant supervisor or control room, and to evaluate the immediate causes and make operational adjustments. If HCN levels exceed the 25 ppm value on two or more detectors, the entire process plant is required to evacuate.

During a review of personnel HCN records during the recertification period, it is noted that a significant number of HCN personnel badge readings during periods in 2020 and 2021 exceeded instantaneous readings of greater than 10 ppm during normal work activities and greater than 25 ppm, the evacuation plant limit indicated in PPO-SOP-1.6.4, which did not trigger plant evacuation. During the preparation of this report, Detour provided findings from an investigation of their historical HCN records. It was determined that the historical readings had both instances of real and false alarms from the personnel badges.

After the audit, Detour instigated a program to more frequently replace personnel badge sensors and to email shift supervisors instances of personnel badge readings greater than 4.7 ppm, once the badge historian is downloaded at the end of the shift. The intent of these programs is to remove instances of false alarms so that real alarms can be better investigated. Instances of badge readings greater than 10 ppm will be accompanied by a report submitted to Inet. Detour must provide a SOP for the HCN sensor changeout process for review and then provide 30 days of HCN personnel badge historian data after the changeout process was initiated. All instances of greater than 10 ppm must be combined with an investigation report indicating the work that was being performed and the actions taken. For instances that are determined to be real, Detour must provide recommended operational controls to be installed or list the additional safety controls to be taken to ensure that employees are not exposed to situations greater than 10 ppm. In addition, Detour must provide all SOPs which are modified to reflect the above changes, and then provide evidence that all Process Plant and Emergency Response Team (ERT) members have been trained to the most current versions of the

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modified SOPs. These actions are included as part of a Corrective Action Plan (CAP) for Detour Lake mine.

Detour uses fixed and personal (portable) monitoring devices to confirm that controls are adequate to limit worker exposure to hydrogen cyanide. HCN alarms were set to generate a sound and a visual alert to operators at 2.5 ppm and 4.7 ppm. At 4.7 ppm, a high-level alarm is activated, including a sound alarm and a flashing strobe in several locations; it also triggers an alarm icon in the control room alerting of possible high HCN gas in the area. At this point personnel are expected to evacuate the immediate area, at least 5m, until a clear signal from the operator room is given. The auditor has verified instrumentation records with those updates. Personal HCN monitors have identical alarm thresholds as fixed HCN gas detectors. The auditor observed plant operators and emergency response personnel using these monitors throughout the audit.

HCN fixed and portable monitors are calibrated on a regular basis and records are kept by the Process team. The Process Instrumentation team coordinates calibration of fixed monitors at least every month. The auditor verified that the HCN portable detectors are bump tested prior to each use. Records of tests and calibration activities both for fixed and portable HCN gas monitors were reviewed by the auditor covering the recertification period. The auditor also confirms that Detour calibration frequency for the fixed and portable hydrogen gas monitors meets the frequencies recommended by the manufacturers.

The auditor verified during the field inspection that appropriate signage is displayed at the plant entrance, milling circuit, and throughout the various facilities to alert personnel of the presence of cyanide, access restrictions and the required PPE for the area. This includes signage at the tailings pipeline. In addition to identification of cyanide areas and PPE requirements, signage is also used to restrict eating, smoking and open flames. Safety showers, eyewash stations, safety kits and fire extinguishers are identified on a map and an excel list and are also checked as part of pre-work inspection checklists to ensure that they are operational and that water flows are adequate. This process of testing the shower and eye-wash stations prior to commencing work was observed during the audit. All fixed eyewash stations have been regulated to reduce the water pressure to ensure it does not present a hazard to users. Sodium Bicarbonate fire extinguishers are verified on a monthly basis by the Emergency Response Team. There are strategically located throughout the operation. The auditors randomly checked fire extinguishers to confirm they are an acceptable type for use with cyanide.

Showers and eyewash stations were randomly inspected during the site inspection to verify functionality. In addition to the daily checks, routine preventative maintenance on the showers is completed monthly. Prior to the sodium cyanide sparging process from isotainers, operators were observed to check the condition and operation of safety showers, among other controls.

Detour uses Sodium cyanide from Draslovka (previously Chemours) since this requirement was established. Colorant dye is added to solid cyanide so that during the mixing operation,

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the high strength (20-30%) cyanide solution turn into a red color solution. Detour has established a color coding for concentrated cyanide solution (magenta/purple) and barren cyanide solution (yellow) that was observed by the auditor following the cyanide path from the cyanide preparation area and the feeding points for the leach tanks and gravity concentrate leach circuit. The same color-coding system is used for the tailings pipelines. Process pipelines, including tailing pipelines, and tanks that contain cyanide or cyanide solution are labeled to enable plant personnel to identify its content. Labeling is typically located at places of frequent access by personnel, reasonable distance to be able to track the lines and identify contents. For pipelines, flow direction arrows are used to allow personnel to identify the flow and possible exposures and/or response requirements for leaks and/or maintenance work. The auditor also verified that in the cyanide training material, process solution tanks and pipelines labelling is covered. During the walk through of the Process plant, the auditors observed the color-coding panel identifying barren solution with the high concentration color code (purple). All other areas observed during the audit had appropriately identified tanks, pipes, and cyanide storage areas.

Detour maintains Safety Data Sheets (SDS) for sodium cyanide from manufacturers (Draslovka) in both hard and electronic copy. These SDS are maintained in English, which is the primary language of the workforce. SDS were also found in the control room and the clinic. In addition to the SDS sheets, signage is available to alert personnel to chemicals and required emergency response requirements in the high-risk cyanide areas. Detour also has binders with first aid procedures in the 3 different locations where they have first aid response kits. Verification was conducted by observing the documents included in the binders and ensuring the SDS were in their most updated versions.

Detour has maintained AP-IMP-001 "Incident Management Plan" which describes that in the event of an incident, how it will be notified, and how the staff proceed to control the situation. Subsequently, the investigation of the incident is done to identify root causes and ensuring that corrective actions are determined.

During the recertification period Detour had no incidents which required reporting. Upon review of both of the mentioned documents, they were found to extensively cover all potential incidents.

6.3 Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 6.3

Summarize the basis for this Finding/Deficiencies Identified:

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6.3(1) Does the operation have oxygen, a resuscitator, antidote kits and a radio, telephone, alarm system or other means of communication or emergency notification readily available for use at cyanide unloading, storage and mixing locations and elsewhere in the plant?

Detour has made available oxygen, resuscitators, radios, telephones, and alarms in six critical areas throughout the plant. Each First aid kits include the following: oxygen tank with pressure gauge, Mask with reservoir bag, manual resuscitator (Ambu), gauze, and gloves. Cyano-kit antidote kits for cyanide treatment used by physicians are located only at the Detour Medics office. The location of the emergency equipment was deemed to be appropriate for the operation. Operators are required to carry a radio while performing their tasks.

Detour has an emergency communication procedure with instructions to activate the alarm system by radio or telephone. The alarm systems for all the HCN monitors and showers have a visual and sound alarm and are hard wired to the control room. All employees and visitors are trained in this system as part of the induction. It also has a dedicated radio channel for paramedics as well as dedicated landline extensions for paramedics and security. Detour has ambulances, located in the medical center. Verification was conducted by visual inspection of the cyanide antidote kits at the medical center and by conducting an interview with the on-site medic.

Detour inspects the cyanide first aid kits monthly. The emergency response team members inspect the ambulances and their contents using a checklist. The site has also presented evidence of refresher training records for employees, on an annual basis, including all management staff and contractors regarding first aid response for cyanide exposure. The auditor noted that all oxygen tanks with kits, in the medical centre and four ambulances were full and operable. The auditor also reviewed examples of completed inspection forms for emergency equipment and examples of completed ambulance inspection forms covering the recertification period.

The auditor verified that all First Aid kits in the field and the antidote kits in the medical centre are stored at the correct temperature and that the antidotes have not expired. Emergency Response Team (ERT) staff performs frequent inspections of the ambulances, cyanide kit and oxygen located in the medical clinic.

Detour medical department has developed ENV-PLN-006 "Cyanide Emergency Response Plan" and ERT-SOG-002 "Emergency Response Guideline for Cyanide Release". These procedures describe what to do in case of an emergency involving cyanide poisoning, and it also serves as an emergency response guideline for ERT members, including the scene assessment, safety aspects, first aid response, cyanide poisoning symptoms and use of antidotes by medical staff. Guidance ERT-SOG-002 provides guidance for the responding ERT members to set up response and decontamination zones pending the situation.

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The procedure also includes responsibilities, intoxication levels and medical attention. The first responder in the place initially will aid the victim securing the area and administering oxygen. This plan also discusses actions to respond to cyanide exposures. This emergency response plan describes the guidelines to follow in case of an emergency related to sodium cyanide, to minimize impacts to people, the environment, property and operations. This specific cyanide emergency plan has implemented a comprehensive system that complements the general Emergency Response Plan (ERP), defining the actions to be taken for the different potential events and the different levels of personnel. In addition, this specific emergency plan for cyanide, assigns responsibilities and establishes the actions to be followed before, during and after the different emergencies with sodium cyanide that can potentially arise. Section 3 of the Plan specifically addresses first aid for cyanide exposure and deals with medical treatment. Specific instructions are given for treating victims who are exposed to sodium cyanide via inhalation, ingestion, and dermal routes. Instructions detail the steps to be taken for conscious versus unconscious victims. Then the medical services will receive the victim decontaminated by the Emergency Response Team (ERT) to receive treatment with the cyanide antidotes, if necessary.

To provide first aid and medical assistance to workers exposed to cyanide, Detour has one onsite fully equipped medical facility (Medical Clinic). The clinic is located about a 5-minute vehicle ride from the Process area. Medics do not respond to the scene of cyanide exposure incidents but are available 24-7 to provide treatment once those exposed are transported to the Medical Clinic. First aid emergency response equipment includes four fully equipped ambulances on site. These ambulances can provide basic Life Support Service and Advance Life Support at the ADR (Adsorption – Desorption – Recovery) Plant, at the underground mine, at the mine open pit mine. Detour has two medics on-site at any given time. In the medical clinic, there are available beds, oxygen tubes, resuscitator, and other equipment for critical care patients. Cyano-kit antidotes may be administered at the clinic according to MED-SOP-001 “Cyanide Poisoning Medical Directive Procedure.” The Medic may need to transport more critical patients to off-site facilities like the Lady Minto or Timmins Hospitals, via either helicopter or ambulance, as dictated by the ERT-SOP-011 v2.2 “Hazardous Material Decontamination and Transportation Procedure.” During preparation of this report, this document was renumbered to ERT-SOP-007. In the event that a medic transports a patient off-site, the other medic is brought to the clinic to resume on-site coverage. The site utilizes a fully trained Emergency Response Team to effectively respond to cyanide and other incidents at the site. In addition, Detour has trained process plant personnel in first aid related to cyanide exposure.

ERT-SOP-011 “Hazardous Material Decontamination and Transportation Procedure” indicates that, in the event of a cyanide exposure where the victim, once stabilized, requires medical attention beyond the capabilities of the on-site medical clinic, the medical department will transport the victim to qualified off-site hospitals (Lady Minto or Timmins). This procedure is applicable to either land transport by ambulance or air transport by helicopter, which is

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determined by the helicopter response time and weather conditions. No medical responses for cyanide took place during the recertification period.

Detour has maintained formalized arrangements with both the Lady Minto Hospital in Cochrane and the Timmins and District Hospitals in Timmins regarding the potential to further evaluate patients that have been exposed to cyanide and that has been previously stabilized at the medical facilities on-site. Therefore, the offsite facilities do not treat victims directly for cyanide exposure. Detour has determined that its medical facilities have qualified staff, adequate equipment, and expertise to respond effectively. These medical centers can be used to assist in emergency response in the route to the mine. The auditor verified that there is a current letter/agreement with these hospitals having qualified medical staff to treat workers with cyanide poisoning. Detour provided training of doctors and nurses on how to treat a patient intoxicated with CN provided by Draslovka, the cyanide producer, along with the staff of Detour.

7. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities.

Standards of Practice

7.1 Prepare detailed emergency response plans for potential cyanide releases.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 7.1

Describe the basis for the Finding/Deficiencies Identified:

Detour has developed several plans and procedures that address potential accidental releases of cyanide. The Cyanide Emergency Response Guidances ENV-PLN-006 "Cyanide Emergency Response Plan" and ERT-SOG-002 "Hazardous Material Emergency Response Guideline" describes specific response actions by the Emergency Response Team onsite. The documents establish measures in the case of cyanide gas release or spills of cyanide solution or solid cyanide.

Detour plans for emergency response list the various credible event scenarios for the site inclusive of cyanide incidents such as cyanide spills, exposures, and transportation accidents. The Cyanide Emergency Response Procedure ENV-PLN-006 "Cyanide Emergency Response Plan" is used to identify catastrophic incidents, including release of hydrogen cyanide in the cyanide preparation area which includes HCN gas generation and large-scale solid and liquid spills. It also covers the scenario of a CN transportation Incident inside the property (iso

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container tipped over) between the security gate and the Process plant. Additionally the the general Incident Management Plan has a quick reference guide for On and Off-site spills of Solid Cyanide. Both documents, ENV-PLN-006 and PPO-SOP-1.6.4, cover response to cyanide releases during unloading and mixing.

The ENV-PLN-006 document has a statement indicates that in case of fires and explosions involving cyanide, the ERT members are responsible for providing appropriate fire fighting measures. The PPO-SOP-1.6.4 SOP describes measures to take for spills generated from pipe brakeage, valve or tank ruptures in various areas of the Process plant.

Overtopping scenarios are covered by the Incident Management Plan quick reference guide for TMA Dam Failure or Overtopping which includes ceasing operations, reporting to authorities, temporary berm creation and deployment of silt curtains. Power Outage failures are covered by Incident Management Plan quick reference guide and plans for generator utilization.

The ENV-PLN-006 document also convers possible scenarios of cyanide solution infiltrating in natural ground and monitoring to determine the impact. Failures or problems in the neutralization circuit are covered by procedure PPO-SOP-11.3.5 "High CN WAD Response", and AP-IMP-001 "The Incident Management Plan" covers procedures for dam failures and large cyanide spills on the facility.

The sodium cyanide supplier for Detour is Chemours (now Draslovka). Draslovka contracts Groupe Roberts for terrestrial cyanide transport. Agreements between Detour and Draslovka are in place, whereby these organizations and their transporters are responsible for shipping of cyanide to site. This responsibility extends to consideration of transport routes, storage and packaging, the condition of transport vehicles and response in the event of an emergency or release during transport. Chemours (Draslovka), in case of an incident on the route, will immediately notify the mine representatives and communicate if they require support from the emergency response team of Detour. The plans also provide for responses to offsite incidents that involve hazardous materials that are being transported to site. In the event of an emergency or incident within the mine property, Detour would respond to such an incident. The Emergency response team does not consider alternative routes within the mine property because there is only one main road to the Process plant. The isotainer is escorted at all times inside the mine property to ensure that the truck driver operates in accordance with the site conditions. ENV-PLN-006 considers specific actions with respect to transport accidents where no cyanide is spilled; those that involve isotainer rupture and cyanide briquette release, both onto dry land and into or near surface water and in the event of a truck fire. The auditor verified the Cyanide Emergency procedure and the route between Detour access point and the Process plant.

Combined, the ENV-PLN-006, AP-IMP-001 and PPO-SOP-1.6.4 describe detailed response actions to cyanide incidents. Based on the level of severity of the situation, personnel are made

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aware of the level of evacuation zone that should be maintained. Section 4.2 of the Cyanide Emergency Response plan describes the role of the medic and ERT teams in providing assistance. MED-SOP-001 "Cyanide Poisoning Emergency Medical Directive" further covers the use of the cyanide antidote kits by the Medic. Control and mitigation measures of a cyanide related incidents are covered under the PPO-SOP-1.6.4. Containment and assessment measures are covered under section 3 of the Emergency Response Plan as well as ENV-SOP-22 "Post Incident Environmental Sampling." Post Incident investigations are covered under the Incident Management Plan.

7.2 Involve site personnel and stakeholders in the planning process.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 7.2

Describe the basis for the Finding/Deficiencies Identified:

Detour solicits the input of its workforce in their emergency response planning documents. Among the mechanisms used the operation to obtain input from his workers, including emergency response, are the daily pre-work meetings and the mock scenario debriefings. Interviews with site personnel the auditor confirmed workers have the opportunity to confirm the operation involved its workforce in the cyanide emergency response process. ERT membership is noted as being voluntary while on-site; although, Detour does provide incentives for its workforce to join. No outside stakeholders have been involved on the development of the Emergency Plan since they do not have designated responsibilities under the plan. However, the site maintains frequent communication with the external responders of the nearby communities and First Nations where emergency procedures were discussed with community leaders. Detour holds annual meetings with community leaders to discuss the use of cyanide in gold mining, potential risks, control measures and community concerns.

Detour has on-site capabilities for dealing with all possible cyanide related incident scenarios and will take full responsibility for response to a cyanide release within the facility. Detour has also established formalized arrangements with offsite medical facilities in Cochrane and Timmins regarding the potential to treat patients that have been exposed to cyanide. Detour has the policy to stabilize victims onsite prior to transferring to off- site facilities. Detour meets with community members and leaders in of the surrounding communities and First Nations on an annual basis to make them aware of the risks of cyanide, possible contingency scenarios, and responses. Topics on the agenda included the use of cyanide in gold mining and its potential cyanide risks, measures to prevent damage to flora and fauna, past incidents and control measures.

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Detour has on-site capabilities for dealing with all possible cyanide related incident scenarios, therefore its emergency plan does not consider external entities having responsibilities or roles nor formally participation in emergency response planning process.

Although Detour emergency plans do not designate any responsibilities to off-site responders and communities, the outside communities of Cochrane and Timmins are made aware of the emergency response plans. Detour has participated in consultations with stakeholders through annual meetings with community and First Nation leaders. The auditors reviewed the meeting list and minutes. Detour also maintains a social engagement program (described in principle 9) that allow communication and feedback between communities, stakeholders, and the mine. These include topics as the transportation and use of sodium cyanide and provides general emergency response written information.

7.3 Designate appropriate personnel and commit necessary equipment and resources for emergency response.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 7.3

Describe the basis for the Finding/Deficiencies Identified:

The ENV-PLN-006 “Cyanide Emergency Response Plan” and AP-IMP-001 “Incident Management Plan” documents include an Incident Commander position and also the incident commanders as alternates when the Chief/Commander is not on site. Further responsibilities are delegated as needed based on ERT members on-site during the incident. The Incident Management Plan matrix identifies the role of the ERT members, who are listed within the ERT Training Matrix. The ERT consists of an ERT Captain and Deputy and at the time of the audit 52 volunteer members. The number of volunteers available at any given time may vary. The ERT Training program includes a four-day initial training which covers all basic requirements. Additional monthly training sessions are held that cover emergency response and cyanide awareness. These trainings must be refreshed on an annual basis. Every member is required to have First Aid training which must also be refreshed annual. Hazmat training was most recently conducted in April 2022. The Cyanide Emergency Response Plan includes office and 24-hour cell phone numbers for the Emergency Response Incident Commanders as well as the Medics office. Asset Protections receive the initial emergency communicates to conduct a paging of the ERT members.

The Cyanide Emergency Response Plan describes the necessary list of emergency response equipment for each area where cyanide is used. The list and location of this equipment is detailed in the Section 6. The Detour ERT documentation includes ERT-SOP-003 “PPE Inspection” and ERT-SOP-004 “ERT Equipment Inspections Program” which identify

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inspections procedures for Hazmat equipment: SCBA (Self Contained Breathing Apparatus), Air tanks, container, compressor, decontamination station. Ambulances are inspected on a daily basis. The Cyanide Emergency Response Plan also indicates that the role of external responders to assist with hospital arrangements, patient transportation, and off-site evacuations. Detour has not assigned external responders a role on the site unless it is determined that off-site evacuation is needed.

Detour does not use off-site responders for cyanide emergencies. However, the site has established formalized arrangements with off-site medical facilities in Cochrane and Timmins regarding the potential to treat patients that have been exposed to cyanide. Detour has adequate staff, equipment, and expertise to respond effectively to emergencies. External entities have not participated in mock drills or implementation exercises because the ENV-PLN-006 "Emergency Response Plan" does not assign them a role on the site.

7.4 Develop procedures for internal and external emergency notification and reporting.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 7.4

Describe the basis for the Finding/Deficiencies Identified:

The AP-IMP-001 "Incident Management Plan" includes procedures and an up-to-date contact information table to notify regulatory agencies, civil defense, municipal and provincial authorities, cyanide supplier, off-site fire departments and police, off-site medical facilities, ambulance/red cross, and other stakeholders. The Plan also has an up-to-date list of Detour management staff. The auditor verified that the list has the correct contact names by verifying names.

Duty Card 5 of the Incident Management Plan includes a list of contact information for community representatives in the nearby areas of Cochrane and Timmins. Media communication procedures are also included in the plan. The auditor verified the responsibilities of the Communications Advisor which includes the coordination with communities to inform about a significant incident and recovery actions implemented.

The Incident Management Plan indicates that ICMI is to be notified in the event of a significant incident. The Plan has been recently updated to include the necessary contact information and scenarios in which ICMI must be notified.

No significant cyanide events took place during the recertification period.

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7.5 Incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 7.5

Describe the basis for the Finding/Deficiencies Identified:

Section 3.8 “Cyanide Sampling and Disposal Plan” of the Cyanide Emergency Response Plan covers the recovery actions for cyanide spills. Any contaminated soils are to be properly excavated and disposed of within the tailings facility. Any standing water is to be vacuumed and either reintroduced into the Process plant or disposed of within the tailings facility. All contaminated soils or materials determined to be contaminated after the required sampling covered in 3.8 are to be excavated and disposed of within the tailings facility. Detour uses bottled water for its alternative mine site drinking water supply. There are no community or resident water supplies that would be at risk to potentially require an alternative water supply.

Section 3.7 “Spill Response” of the Cyanide Emergency Response Plan” prohibits the use of sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat surface waters or in conditions where the spill or treatment chemicals could reach surface waters, as it could be harmful to aquatic life.

Detour has established monitoring measures for affected areas in case of a cyanide spill under Section 3.8. These documents describe the sampling methodologies, parameters and, where practical, possible sampling locations, the spacing, depth and volumes for soil confirmation sampling, along with the required analyzers and detection limits for total, WAD and free cyanide, which are listed at Total Cyanide <0.2 mg/L, Free Cyanide <0.04 mg/L (by method SM-4500-CN-1), and WAD Cyanide <0.5 mg/L (by method SM-4500-CN-1). Samples are to be analyzed on a rush basis an external laboratory.

7.6 Periodically evaluate response procedures and capabilities and revise them as needed.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 7.6

Describe the basis for the Finding/Deficiencies Identified:

The Incident Management Plan and the Cyanide Emergency Response Plan are revised at least once a year; however, some annexes are regularly reviewed (for example, the contact telephone numbers) or every time there are significant changes and new information, after the

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occurrence of an unwanted event, mock drills or changes in compliance requirements or regulations. The latest version reviewed for the Incident Management Plan and Cyanide Emergency Response Plane were November 2021 and June 2022 respectively and include a “modifications head page” that allows to track changes and ensure there is a detail explanation of the changes (additions or deletions). The auditors verified that the plan has been reviewed and evaluated since the initial Certification Audit.

Detour conducts bi-annual mock drills based on likely release/exposure scenarios to test the response procedure, and incorporates lessons learned from the drills into its response planning. Records of these drills are kept with the Emergency Response Department and were reviewed as part of the evidence. Documentation includes photos, strengths, weaknesses, lessons learned and corrective actions. Follow up correspondence verifying that identified corrective actions have been accomplished was also reviewed. In December 2020, a Cyanide mock drill was conducted near the tailings management area involving a haul truck striking the tailing pipeline. The drill report includes improvement plans related with communication protocols. In November 2021, a cyanide mock drill was conducted involving an isotainer that ruptured during the off-loading process. Full medical procedures were initiated for the truck driver who was assumed to have been exposed to cyanide.

A section on Post Incident Evaluation in the Incident Management Plan states that a review session should be held after an actual cyanide-related incident occurs, after mock drills or changes in compliance requirements or regulations. There were no cyanide related incidents that took place during the recertification period; however, the auditor reviewed the incident evaluations that are conducted after each mock drill.

8. TRAINING: Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.

Standards of Practice

8.1 Train workers to understand the hazards associated with cyanide use.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 8.1

Describe the basis for the Finding/Deficiencies Identified:

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All personnel and contractors working for Detour receive formal training on cyanide according to their position and tasks. Detour requires that all individuals on-site, including contractors and visitors, receive the Mine Site Orientation and that individuals accessing the Process Plant take an additional Plant Safety course. The Detour Training Department maintains a training matrix for contractors in the Norcat system and for Detour employees in the Skillmine system with all training courses provided related with Cyanide. It also has a training matrix in excel for employees that details which training should be received depending on their job description. The training matrix includes personnel from all departments. The auditor verified the cyanide training records of four workers that were interviewed during the field audit and verified that in all cases they have shown proof of training in Cyanide and in their specific tasks.

Refresher training is conducted to all personnel and contractors that could be exposed to Cyanide. For other workers with functions and roles that do not require to be in contact with cyanide, the mine provides short refresher courses that includes some power point slides on Cyanide hazards. The presentation regarding Safe use of CN, includes the following topics: Cyanide transport, storage, and handling, Cyanide risks, Health effect and intoxication symptoms, PPE required, Exposure limits, First Aid Response and Emergency actions. Detour has recently implemented the Skillmine system which is a training program based on web access for employees to track necessary trainings and reevaluations needed per employee. The Skillmine system requires that the Process Plant Safety and Cyanide Awareness trainings be refreshed on an annual basis. While all reviewed workers had completed their initial cyanide training, not all employees were up to date on refresher trainings for Cyanide Awareness or ERT-SOG-002 "Emergency Response Guideline for Cyanide Release." at the time of the audit. Since the initial audit, ERT-SOG-002 has been renumbered ERT-SOG-001. Detour provided training records for Process Plant and ERT employees indicating training on current versions of the Cyanide Awareness module and ERT-SOG-001. No further actions are necessary in order to be compliant with the Code.

The auditor verified that training records, including refreshers and cyanide hazard training for Health, Safety, Environmental, Emergency Response, Supply Chain personnel, the process plant operators and contractors are retained based on regulatory requirements, in the form of hard copies and also an electronic version stored. Training records identify the trainer, trainee, topics covered, date and sign off sheet. This requirement was verified through review of a sample of records covering the recertification period.

8.2 Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 8.2

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Describe the basis for the Finding/Deficiencies Identified:

All personnel in job positions including cyanide mixing, processing, leaching and maintenance, receive training on how to perform their assigned tasks with minimum risk to worker health and safety. The training department maintains the Skillmine system and up to date an excel matrix with Work Instructions and Procedures for job specific training. Each Procedure requires a signoff from a competent trainer prior to conducting that task. The work procedures and work instructions training are performed once a year, or after significant document changes. In general, task training does not apply to contractors because they are not responsible for operating the cyanide facilities.

The auditor reviewed training records for PPO-SOP-10.1.11 "Mixing Sodium Cyanide", PPO-SOP-1.38.0 "Reacting to HCN Gas Measurements", and PPO-SOP-10.15.5 "Cyanide Isotainer Delivery, Off Load and Change Out." Records included written evaluations for individuals performing these tasks during the audit period.

Training elements for each specific job are covered by the supervisor in charge of the training session. Personnel are trained following the work procedures, and the work instructions which include the step-by-step process to perform the job. These work procedures include the objective, required PPE, decontamination requirements, risks associated with the cyanide task and the individual task specific steps.

All personnel in job positions that involve cyanide handling are required, prior to working with cyanide, to receive training on how to perform their assigned tasks with minimum risk to worker health and safety. Detour has experienced plant supervisors providing training on cyanide related procedures and work instructions. These supervisors have been in their position for several years and have helped to develop the procedures/work instructions, and on some occasions, training is supported by experienced employees.

Several plant supervisors were interviewed during the field audit to determine a sufficient level of technical expertise in operating the facilities and their abilities to communicate that to their employees. The auditor also verified training records and trainer names to confirm they were supervisors. Detour has conducted a General Cyanide overview course provided by Chemours, which was verified by the auditors.

Staff must receive the corresponding task training before being allowed to work with cyanide, in an unsupervised manner and staff must successfully complete the training before they work independently. Verification was done by interview with field personnel. The written training program indicates that area supervisors are responsible for ensuring that task training occurs. New trainees are assigned to work in task specific functions under the supervision of a competent operator until they demonstrate ability to work without direct supervision in a safe and responsible manner.

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Detour requires and provides refresher training for safe handling of cyanide, first aid for cyanide intoxication, cyanide emergency response and operational procedures/work instructions to assure employees and contractors continue to perform their jobs in a safe and environmentally protective manner. The Skillmine training program requires annual refresher training which includes physical and chemical characteristics of cyanide, cyanide handling, monitoring, pH control levels, exposure limits, exposure symptoms, PPE, treatment, rescue equipment, safety showers, emergency warning systems, evacuation, disposal, and spill procedures. The training database in Skillmine includes all training given to the process plant employees as well as maintenance department. Training records and test results covering the recertification period were reviewed by the auditors for supply chain, maintenance, and process plant staff.

To evaluate the effectiveness of training related to cyanide, the training sessions periodically evaluate the knowledge of the employee to demonstrate understanding of the material. A certificate of completion and verbal understanding is undertaken after signing the relevant standard operating procedure to indicate understanding. Detour supervisors observe new employees and determine when they are ready to work independently. The auditor verified cyanide testing records for four workers that were interviewed during the field audit. In all cases the auditor found the evaluation and/or a certificate of completeness including the signature of the supervisor.

Cyanide training records for Detour are retained in the Skillmine system for all employees and the Norcat system for contractors and visitors. Records include the name of the employee, who provided the training, what topics were covered and that the employee demonstrated sufficient knowledge in every topic to be considered trained.

8.3 Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 8.3

Describe the basis for the Finding/Deficiencies Identified:

The auditor verified that plant operators and maintenance personnel responsible for cyanide preparation, processing, and maintenance are trained in decontamination and first aid procedures for cyanide release incidents. Verification included review of training records and interviews with cyanide operators.

In addition to receiving training for Cyanide awareness, the training program states all process personnel must take PPO-SOP-1.6.4 "Responding to Detection of High HCN Gas and/or

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Cyanide Solution Leaks”, which covers the evacuation procedures in cause of a cyanide release. ENV-PLN-006 “Cyanide Emergency Response” plan covers the Emergency Response including cyanide release procedures, first aid for exposures, as well as control and cleaning measures for environmental releases. Operators were interviewed and demonstrated good awareness of what actions are to be taken in the event of cyanide release.

The Emergency Incident Commander, medics and ERT responders are all trained in the Emergency Response Plan according to an annual training program and schedule which includes hazmat and cyanide related emergency response. The auditor verified the latest training matrix which compiles all of the most recent trainings for ERT members. The most recent Hazmat refresher was conducted in April 2022 with significant attendance by ERT membership. A sufficient number of ERT members were also within a one-year period of having completed the General Cyanide Overview and First Aid for Cyanide Exposure with Amyl Nitrate courses provided by the cyanide supplier (Chemours). These certificates were verified by the auditor. Emergency Response Team members consist of supervisors and workers who have voluntarily committed to the program and trained in the use of necessary response equipment as self-contained breathing apparatus and suits, decontamination equipment, extraction equipment and firefighting equipment. Emergency responders are available on all shifts. Knowledge and competence level is tested through tests, field practice and drills.

Detour is 187 km from the nearest community, in Cochrane, ONT. As such, they have provided evidence that their own responders are prepared for cyanide-related emergencies involving preparation, processing, leaching and maintenance activities. They have adequate staff, equipment, and expertise to respond effectively to emergencies. Detour does not require off-site emergency responders, nevertheless, it has established formalized arrangements with off-site medical facilities in Cochrane and Timmins regarding the potential to treat patients that have been exposed to cyanide. Detour has provided training to local emergency responders in Cochrane for familiarization and review.

Refresher training for cyanide events is conducted as part of the site training and emergency drills program. Training requirements from the training matrix are routinely monitored and refresher training is scheduled as required. Detour personnel receive annual specific and general refresher training. Training topics include cyanide management, safe cyanide handling, first aid for cyanide intoxication, cyanide SDS, General Emergency Plan, Cyanide Code, management, equipment decontamination and plant emergency stop, among others.

Records of emergency response training are retained on files by the Training Department and the Emergency Response Team. These include training conducted by internal and external parties. The auditor verified training for four ERT members conducted in November 2021 and April 2022, with topics include cyanide response management, first aid for cyanide intoxication, use of portable HCN monitors, cyanide code, equipment decontamination, spill remediation, plant emergency stop, among others. In all cases, records have names of the employee, the

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date of training, the topics covered, and an evaluation. Refresher training for cyanide events is conducted as part of the site training and emergency drills program. Training requirements from the training matrix are routinely monitored and refresher training is scheduled as required. Detour personnel receive annual specific and general refresher training.

The auditor also reviewed refresher training on specific response procedures in PPO SOP 1.6 Responding to Detection of High HCN Gas and Cyanide Solution Leaks

9. DIALOGUE AND DISCLOSURE: Engage in public consultation and disclosure.

Standards of Practice

9.1 Promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 9.1

Describe the basis for the Finding/Deficiencies Identified:

Detour maintains communication through annual meetings on operations of the mine. This annual reporting was most recently conducted in June 2022. The majority of the stakeholder engagement for Detour is with First Nations partners. There are no nearby communities in the immediate area. Cochrane is the nearest community, which houses a Detour office and the bus terminal for employee transportation to site. The primary concern by the area First Nations is preservation of the area for traditional land uses, such as hunting, fishing, trapping, etc.

Detour published a cyanide (Code) fact sheet which has been used at open house sessions for the public. A poster board presented the fact sheet information and handouts were made available. The fact sheet is also used for meetings with the First Nations partners and by human resources for job fairs and at the Canadian mining exposition in Timmins. Detour has a formal requirement to maintain a regional environmental monitoring body, consisting of one representative from each of the four First Nations groups. The representatives work two weeks onsite, followed by two weeks off with two monitors per rotation to provide continuous coverage at site. Each monitor prepares an end of shift report at the completion of each rotation that is made available for their community. Their respective Chief in Council reviews the reports and can ask questions if desired. The monitors are also invited to make presentations to Chief in Council, with issues being raised to Detour, if necessary. Representatives from the respective communities periodically gather to discuss any environmental related concerns, such as water

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management, wildlife protection, etc. Regular meetings are held in an open forum with a formal agenda and are coordinated by Detour. The communities may or may not elect to participate, with one First Nations group preferring direct, one on one engagement with Detour rather than working with the other three groups. Stakeholders are heavily involved in permit review processes. The IBA establishes a means for Detour to provide financial support for technical experts to review permit submittals on behalf of each of the First Nations groups. Each group has 30 business days to review a permit submittal, and Detour has to provide proof of engagement to address concerns before permit approval by the regulatory authorities.

The Detour website has contact information that is monitored Monday through Friday for public comments via email, phone, etc. Office locations and email addresses are available to the public. Records discussed in personnel interviews indicated that to date, employment inquiries have been received through these means of communications, but there have not been any community concerns noted. Detour social media platforms are monitored regularly, offering additional means for public communication and feedback. Quick links to social media accounts are located on company website. The listed email address is Info@agnicoeagle.com and the website address is

<https://www.agnicoeagle.com/English/about-agnico/company-directory/default.aspx>

9.2 Make appropriate operational and environmental information regarding cyanide available to stakeholders.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 9.2

Describe the basis for the Finding/Deficiencies Identified:

Detour Lake distributes Responsible Cyanide Information to the neighboring communities of Cochrane and Timmins, ONT and to the surrounding First Nations. They provide an annual report to all communities covering the aspects of environmental assessments and cyanide handling over the preceding year. Additionally, a flyer had gone out to all communities regarding Detour Lake's commitment to the ICMI code and cyanide management. These reports were reviewed and verified by the auditor.

The Detour Lake annual report is given in the local community as a verbal and visual powerpoint presentation, where the public attendance is allowed. The most recent presentation was given in June 2022, reviewed by the auditor.

Detour makes publicly available information on issues and exposures, as necessary, through public statements, regulatory reports, and the Annual Responsibility Report. During the recertification period, Detour has not experienced incidents resulting in hospitalization or

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fatality, releases that leave the mine site fences of property, significant adverse effects to health and the environment, cyanide release, or exceedances of applicable cyanide limits.

Detour Lake has maintained up to date its procedures to respond to a cyanide release as part of the Emergency Response Plan for any type of potential cyanide releases that could have significant adverse effects to health and environment. The Emergency Response Plan and Communication plan covers the neighboring communities. There were no cyanide incidents that were required to be reported during the recertification process. Among the potential incidents included in the Plan there are scenarios related with cyanide releases on and off the mine site. In lieu of such an incident, Detour Lake has provided copies of their cyanide mock drills to the local or impacted communities.

Detour Lake is required to report to all incidents to the Canadian authorities. This would include severe incidents involving hospitalization or fatalities as well as any release of hazardous materials resulting in potential adverse effects to the environment, to safety and health of workers or communities. Cyanide spills greater than 100 kg are additionally reported to the Ministry of Environment Conservation and Parks (MECP – Ontario). They also submit an Environmental Compliance Act (ECA) Annual Report to the MECP-Ontario which summarizes any material spilled and the quantities. Additionally, any spill impacting a watercourse or waterbody is reported to the Natural Resources Canada (NRC).

They provide the Canadian authorities, including the MECP-Ontario, NRC, Environment Canada (EC) and Fisheries and Oceans Canada (FOC), and all partnered First Nation communities with a copy of their Annual Responsibility Report, which would include any reports of incidents or spills at the site. Detour Lake does not believe that any of these agencies make any reports of incidents publicly available.

In addition to sending the Annual Responsibility Report to the mentioned agencies, Detour Lake compiles the report, along with any comments from the public, and publishes it to their website, which is accessible to the public. The ECA Annual Report is only made available to the public upon request.

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