

International Cyanide Management Code Mining Operation Recertification Audit

Summary Audit Report

Report Prepared for

Detour Lake Mine

Agnico Eagle Mines Limited

145 King Street East, Suite 400
Toronto, Canada M5C 2Y7



Report Prepared by



Mountain Valley Professionals, LLC

MVP Project NO.: P-P&C(D)2025.93

May 27, 2026

Detour Lake Mine

International Cyanide Management Code

Initial Certification Summary Audit Report

Detour Lake Mine

145 King Street East, Suite 400
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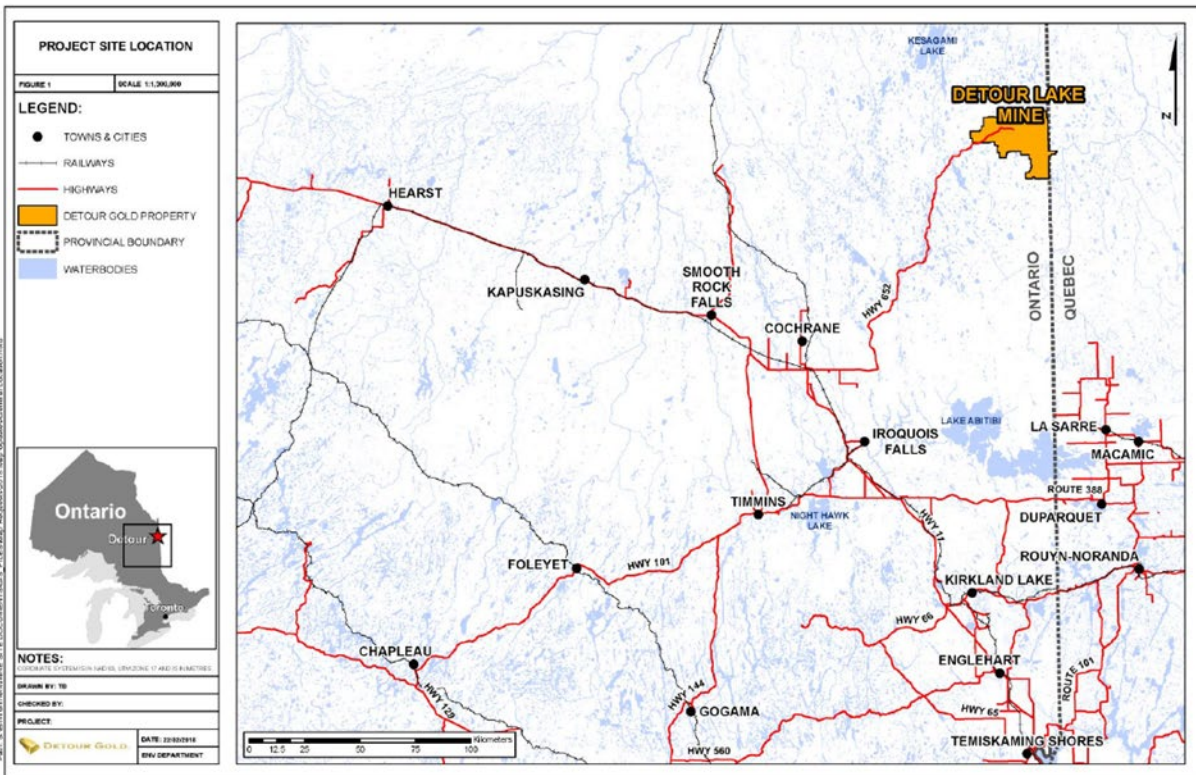
Operational Contact

Mine Operations: Detour Lake Mine
Mine Owner: Agnico Eagle Mines Limited
Name of Operator: Agnico Eagle Mines Limited
Name of Responsible Manager: Michelle Moore, *General Manager*
Address and Contact Information: Agnico Eagle Mines Limited

Location and Description of the Operation

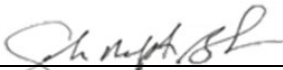
The Detour Lake mine (Detour) location is presented in **Figure 1**. The Detour Lake open pit mine is located in northeastern Ontario, approximately 300 kilometers northeast of Timmins and 185 kilometers by road northeast of Cochrane, within the northernmost Abitibi Greenstone Belt. The operation is 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.

Figure 1 - Location of Detour Lake Mine



Detour Lake Mine

Name of Mine


Signature of Lead Auditor

May 27, 2026

Date

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. Cyanide is delivered at the Detour Lake mine in solid form (briquettes) 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 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/t or 7,140 t/a.

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, SO_2 , 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.

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,
- CIP circuit, barren tank,
- pre-detox thickener, and
- detox tanks.
- The tailings pipeline corridor,
- Tailings Management Area
 - Cell 1 and Cell 2,
 - seepage collection ponds,
- the milling circuit,
- Cyanide Storage area, and
- Cyanide mixing area including cyanide mixing and distribution / storage tanks.

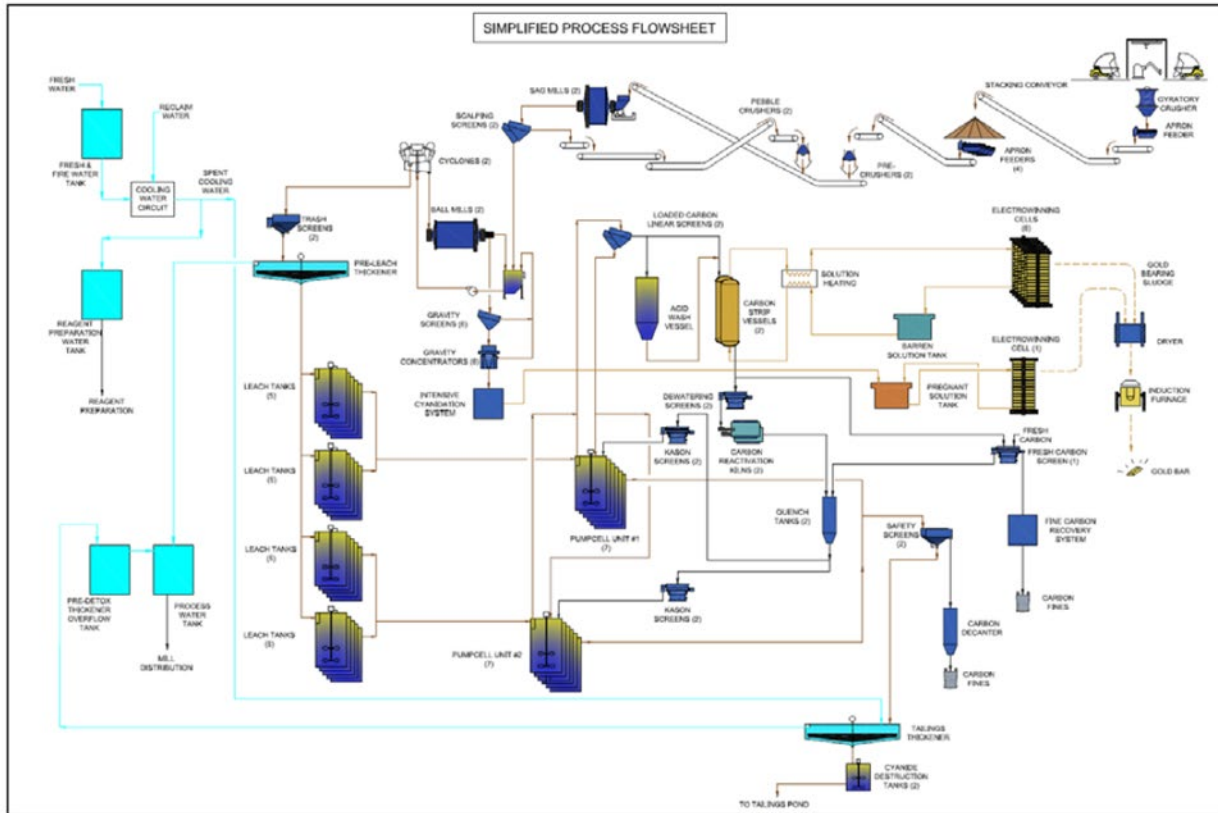
There are no treated cyanide water discharges to the environment at Detour Lake.

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 in **Figure 2**.

Figure 2 - Detour Lake Process Flowsheet



Auditor Information

Detour Lake Mine

- in full compliance with**
 in substantial compliance with
 not in compliance with

**The International
Cyanide
Management
Code**

The auditor has determined that the Detour Lake Mine is in **Full Compliance** for this ICMC audit. This operation has not experienced any compliance issues during the previous three-year audit cycle.

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www.mvp-nv.com

Audit Team Leader: John R. Barber
Lead Auditor & Mining Technical Auditor

Email: john.barber@mvp-nv.com

Mining Technical Auditor: Adam House

Email: Adam.house@patersoncooke.com

Audit Dates

The site visit for the Recertification Audit occurred over 4 days from November 18th – 24th, 2025.

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.

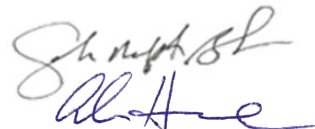
I attest that this Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Institute for Mining Operations Verification Protocol (2021) and using standard and accepted practices for health, safety, and environmental audits.

Date: May 27, 2026

Operation Name: Detour Lake Mine

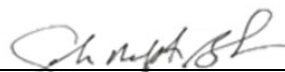
Signature of Lead Auditor:

Signature of Technical Expert Auditor:



Detour Lake Mine

Name of Mine



Signature of Lead Auditor

May 27, 2026

Date

PRINCIPLE 1 – PRODUCTION & 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 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 with**
 in substantial compliance with
 not in compliance with

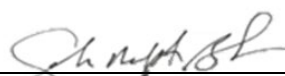
Standard of Practice 1.1

Summarize the Basis for this Finding or Deficiencies Identified:

Draslovka Mining Solutions (Draslovka), through their wholly owned subsidiary Covoro Mining Solutions Canada Company (Covoro), is contracted to supply cyanide to the Detour Mine. Detour has a sales agreement to purchase sodium cyanide from Covoro Mining Solutions Canada Company, a wholly owned subsidiary of Draslovka. The agreement with Draslovka dated October 19, 2022, including Amendment 1 on July 1, 2024, is valid until December 31, 2030. The contract requires that the Seller (Draslovka) and its Affiliates must remain certified under the Code for the duration of the agreement. The Draslovka US Production and Packaging Operations (Tennessee, USA) produces the cyanide for Detour and is certified under the Code, according to the International Cyanide Management Institute (ICMI) website. The Draslovka US Production and Packaging Operations achieved the original certification in 2006 and has maintained compliance and its ICMI certification since that time. The latest recertification was on May 24, 2023.

Detour Lake Mine

Name of Mine



Signature of Lead Auditor

May 27, 2026

Date

PRINCIPLE 2 - TRANSPORTATION

Protect communities and the environment during cyanide transport.

Standard 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 with

in substantial compliance with

not in compliance with

Standard of Practice 2.1

Summarize the Basis for this Finding or Deficiencies Identified:

Written agreements for the transportation requirements were in place under the supply contract with Draslovka during the recertification period. The cyanide purchase contract includes the cyanide manufacturer's (seller) responsibility for delivering the product to the mine's site using only ICMI certified transporters.

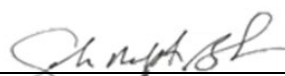
The seller utilizes a certified supply chain to manage the product from the production facility to the site. The supply chain consists of rail and truck transport from the Memphis plant as part of the Draslovka U.S. Supply Chain to several interim storage facilities including the Draslovka Canada Bulk Transloading Facility, operated by Octium Solutions, in Malartic, Quebec. Draslovka loads hopper cars at the Memphis plant, which is covered by the cyanide production certification of the facility. The hopper cars are transported by the Canadian National Railway (CNR) to the Draslovka Canada Bulk Transloading Facility in Martic, which is certified as a production facility. The cyanide is loaded into isotainers and then onto trucks in Malartic. Transport of isotainers by truck from Malartic to Detour Lake is by Groupe Robert.

Safety and maintenance of the means of transportation throughout transport is the seller's responsibility, as well as task and safety training and emergency response for the seller's transporters throughout the process. Security is addressed as part of the Draslovka Supply Chain ICMI certifications.

All transportation elements for Detour are certified under the Draslovka United States Supply Chain (recertified on June 13, 2025) or the Draslovka Canada Supply Chain (recertified May 24, 2023), including rail shipment by CNR and trucking by Groupe Robert. Chain of custody records for the recertification period were reviewed and found to be in compliance.

Detour Lake Mine

Name of Mine



Signature of Lead Auditor

May 27, 2026

Date

PRINCIPLE 3 – HANDLING & STORAGE

Protect workers and the environment during cyanide handling and storage.

Standard 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 with

in substantial compliance with

not in compliance with

Standard of Practice 3.1

Summarize the Basis for this Finding or Deficiencies Identified:

Detour uses cyanide, in briquette form, received in isotanks, which are stored in a single location inside a fenced area of the plant, adjacent to the process plant building. The cyanide storage area does not have an engineered design (e.g. no roof, is located outdoors); however, Detour utilizes the characteristics of the isotanks to meet the intent of the Code requirements (i.e. the isotanks have by design a secondary containment in their 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, stamped by a Certified Professional Engineer Registered in the Province of Ontario, were retained and available for review.

The cyanide storage area is located inside the plant area and located far away from communities and surface waters. The cyanide fenced storage is adjacent to the process plant building, where the offices of Process personnel are located. The process plant has an Hydrogen Cyanide (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 outside grade.

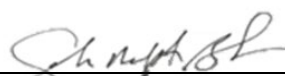
The drainage system from the plant area directs all meteoric water to the west pond and sediment pond #2, where any cyanide solution spill would be collected and pumped back to the process. These ponds represent an additional contingency measure in addition to the existing secondary containment systems 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).

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.

Detour Lake Mine

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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, which includes testing, and are maintained annually. The auditors reviewed maintenance records for the level indicators for the recertification period and found them to be complete. No failures of the level indicators were reported for the recertification period. The auditors observed screenshots of HMI showing that the level indicators were functioning correctly.

The cyanide mixing and distribution tanks are located within a concrete bermed containment, which were observed to be in good condition and compatible material for containment in the event of a release or tank failure. The containment volume for the cyanide mixing and distribution tanks, has not changed since the last audit and 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.

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 fenced 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 been designed with a secondary containment within its structure which provides coverage from rain/snow 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 a fenced 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 mechanical 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-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 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 plant 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.

Standard of Practice 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 with** **Standard of Practice 3.2**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

Detour receives solid (briquette) cyanide in isotanks; no drums or wooden crates are involved. Site has developed procedures that require the external shell of the isotank 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.

To ensure that the isotanks are empty before returning them to the vendor, Detour has implemented a procedure to triple air flush the isotank.

The empty isotanks are returned to the fenced storage area, labelled accordingly, and then removed from site and shipped back to the vendor.

The auditor observed this practice during a cyanide mixing event.

These requirements were verified through field inspections, review of documentation and interviews. All personnel interviewed have knowledge of their tasks and associated risks during cyanide handling.

Detour has developed a written SOP that outlines the requirements for inspection, observation and mixing of cyanide solutions, as well as the operation, maintenance, and function of hoses, valves and couplings, 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.

Detour has an SOP that indicates that the cyanide isotanks are handled using a sea-can handler crane, either to 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.

Detour has an SOP that indicates that isotanks shall not be stacked more than 2 high at a time and prohibits stacking full isotanks on top of empty ones. This practice was verified in the field.

Detour has an SOP that requires any cyanide spill or residual 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.

Detour has developed an SOP that requires operators to use the appropriate personal protective equipment (PPE) during mixing activities. SOPs also require security personnel check that the correct PPE is being used prior to starting the mixing activities and observe 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.

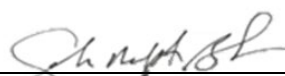
Video monitors are in place to always monitor cyanide mixing activities. These requirements were verified by the auditors in the field by observing a cyanide mixing event.

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.

Detour Lake Mine

Name of Mine



Signature of Lead Auditor

May 27, 2026

Date

PRINCIPLE 4 – OPERATIONS

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

Standard 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 with** **Standard of Practice 4.1**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The scope of the recertification audit at Detour Lake includes the following cyanide facilities: Process plant facilities including an ILR, pre-leach thickener tank, 4 trains of 5 leach tanks each, CIP circuit, barren tank, pre-detox thickener, and detox tanks. The scope also includes the tailings pipeline corridor, 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 SOPs for the safe operation of cyanide facilities.

Detour has manuals and procedures that identify the assumption and parameters for the safe operation of cyanide facilities. The OMS Tailings Storage Facility Manuals consider an Environmental Design Flood for Cell 1 and Cell 2 of direct precipitation in each cell, respectively, corresponding to a spring run-off event. Maximum operating water levels in Cell 1 and Cell 2 TMA are established such that containment is maintained. 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 Manual also includes a seasonal operating target range for Weak-Acid Dissociable (WAD) 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 site SOPs.

The OMS Manual also include a maximum WAD cyanide concentration 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 –Tailings Storage Facility Operations & Management Manuals include 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 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 include: 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.

Detour develops and implements a weekly plan for preventive maintenance using SAP software. Preventive maintenance plans are generated automatically for each week. Corrective maintenance occurs as a result of work orders based on inspections. Work orders generated from inspection forms are entered in the system, including assigned priority. The auditors observed examples of both preventive maintenance and corrective maintenance records for the recertification period and found them to be complete.

Detour has developed and implemented management of change (MoC) process SOP and is transitioning the MoC processes to an electronic format. The MoC has been implemented 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 cyanide pipeline construction 2024; change of pipeline routing to accommodate plant maintenance 2025 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.

The Detour Lake Mine, Tailings and Water Management Infrastructure Emergency Preparedness and Response Plan addresses emergency responses for Cell 1 and Cell 2 includes contingency scenarios and emergency response situations related to water management at the TMA and associated facilities such as:

- Extended period of unusually heavy rainfall, or unusually large snowmelt.
- Severe flood/intense rainstorm or rapid snowmelt.
- Significant and sudden increase in seepage discharge, accompanied by discharge of tailings within seepage (dirty water).

- Relatively high, unexplained, and on-going increase in piezometer levels within the dam and/or foundation – threshold limits being approached.
- Rupture of tailings and/or water pipelines on crest of dam, resulting in erosion of downstream dam slope.
- Seepage daylighting from tailings slope at a significantly higher elevation than had previously been observed at that particular location.
- Sinkhole observed on tailings beach or on downstream dam slope.
- Collapse of decant tower and/or outlet pipe.
- Rapid, unexplained, orders of magnitude increase in seepage rate and turbidity (dirty water indicating transport of tailings) at a dam slope seepage location and/or foundation.

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. In case of power outages, Detour has developed SOPs.

In addition, the Emergency Preparedness and Response Plan (EPRP) also includes activities related to the tailings pipeline 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.

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.

In relation to a temporary closure or cessation of operations scenario, actions to be taken are described in the Closure Plan submitted to the authorities. The plan describes rehabilitation measures in case of a temporary suspension of activities and 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 has 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 test at this tank has been postponed due to limitations for bypassing the tank without affecting production. Evidence of a wall thickness test conducted during the previous audit for the distribution tank was reviewed to verify its integrity. Detour is preparing a plan to empty the tank to conduct a proper inspection and non-destructive tests of the tank walls.

Secondary containments for tanks containing cyanide solution are also inspected every shift for integrity and capacity. The pre-detox thickener and the pre-leach 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. During the field visit, the secondary containments were observed to be generally free of any fluids or materials stored within them.

Not applicable to Detour, as there are no heap leach facilities and solution ponds.

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.

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.

The auditors conducted a field inspection during the site visit and verified the condition of tanks, secondary containments, pipelines, pumps, valves, tailings pipeline corridor, tailings freeboard, and the presence of salts. These inspections also included cyanide unloading, mixing and storage facilities. The auditors reviewed inspections records and verified that inspections to cyanide facilities are conducted on a consistent manner.

Detour has a program to conduct inspections of cyanide facilities with frequencies that vary from daily, weekly, monthly, biannually and annually.

The OMS Manual for the TMA include a list of critical aspects and areas to be inspected and inspection frequencies. These inspections are conducted by different areas (e.g. Process, Environmental, and Projects) and frequencies vary from every shift to weekly, monthly 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 equipment is functioning within design parameters. The auditors reviewed inspections records and verified that inspections are conducted in a consistent manner.

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 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:

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.

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. The auditors observed examples of both preventive maintenance and corrective maintenance records for the recertification period and found them to be complete.

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. These backup generators are for larger equipment at the process plant. Two 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 alarm panels, evacuation alarms, HCN monitors, among others. The other two generators would be started manually.

For the TMA and seepage collection ponds there are three generators. These generators were commissioned in the summer of 2022 and have been 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.

In case of power outages, Detour has procedures that provide requirements to prepare for and manage unexpected site wide power outages.

Standard of Practice 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 with** **Standard of Practice 4.2**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or 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/targets for cyanide at the plant for 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 leach trains is controlled independently using online analyzers. Samples are taken every 15 - 20 minutes from Tank #1 of each train and analyzed for free cyanide. If values are below the set point/targets for free cyanide it will automatically adjust the pumps accordingly and add more cyanide to the system. Operators also take samples for 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 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.

Standard of Practice 4.3 **Implement a comprehensive water management program to protect against unintentional releases.**

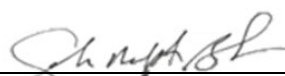
The operation is **in full compliance with** **Standard of Practice 4.3**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or 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 updates climate data on a monthly basis and calibrates the model twice a year.

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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 provides an overview of the model and its functions, including provision for the uncertainty and variability of precipitation events.

The Goldsim Water Balance and Water Quality Model, 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 direct precipitation in Cell 1 and 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 maintained below the spillways, to ensure the environmental design storm 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 to unrecovered seepage not captured by the seepage pumping systems.

The model does not include the effects of potential power outages as Detour has 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.

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 adequate freeboard was maintained at all times in Cell 1 and Cell 2 and the seepage collection ponds. 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 EDF event for direct precipitation in Cell 1 and Cell 2, corresponding to a spring run-off event of duration 30 days and frequency 1:100 years. The TMA dams allow for 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 was maintained below the spillways, to ensure the environmental design storm can be contained with no discharge through the spillway.

The auditors reviewed data for the recertification period and verified that the freeboard was maintained at all times in Cell 1 and Cell 2.

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.

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.

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

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

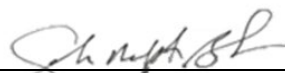
Summarize the Basis for this Finding or Deficiencies Identified:

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 between 42 to 70 mg/l WAD cyanide in the tailings leaving the detox system. In the previous audit Detour had conducted a Management of Change process to adjust the WAD cyanide target in final tails during the summer months. SOPs allow 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. The auditors reviewed on-site grab sample data for 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, except for one, short duration, exceedances in 2024 and 2025. Third-party laboratory sampling of TMA indicated that during the months of the exceedances in 2024 and 2025 the WAD cyanide concentrations in the TMA were below 50 mg/l WAD cyanide.

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Detour has a 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.

The OMS Manuals specify an operating target of between 42 to 70 mg/l WAD cyanide in the tailings leaving the detox system. The auditors reviewed on-site grab sample data for 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, except for one, short duration, exceedances in 2024 and 2025. Third-party laboratory sampling of TMA indicated that during the months of the exceedances in 2024 and 2025 the WAD cyanide concentrations in the TMA were below 50 mg/l WAD cyanide. Water quality at the decant pond is monitored on a monthly basis for WAD cyanide. Detour samples at the spigots and in the water flowing across the beach area prior to entering the decant pond for WAD cyanide. The sampling data indicates that the WAD cyanide concentrations are below 50 mg/l WAD cyanide, with limited exceptions

Since the start-up of the operations, Detour has been successful at preventing wildlife mortalities related to cyanide facilities. Third-party laboratory sampling of the TMA indicated that WAD cyanide concentrations in the TMA values are well below the recommended value of 50 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 one mortality at the TMA. A fox was found dead in Cell 2 of the TMA in October of 2023. The subsequent investigation determined it was non-cyanide related. For this auditing period no mortality related to cyanide.

Standard of Practice 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 with** **Standard of Practice 4.5**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

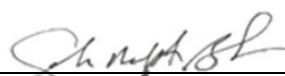
The Detour operation does not have direct discharges to surface water from cyanide facilities, which is operated as a zero-discharge facility.

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, values for free cyanide for this audit reached a maximum level of 0.20 mg/l and an average of 0.035 mg/l. The highest values recorded correspond to seepage pond #3. For Cell 2, values for free cyanide for the same period reached a maximum level of 0.089 mg/l and an average of 0.020 mg/l. The highest values recorded correspond to seepage pond #1 and #2.

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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 0.007 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.

Standard of Practice 4.6 **Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of ground water.**

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

Summarize the Basis for this Finding or 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 concrete flooring that was observed to be in good condition. 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 MW11-23A, reported an average of 0.038 mg/l free cyanide in 2024, while MW17-01 reported an average of 0.048 mg/l free cyanide in 2024. The values have increased over the audit period but were below the provincial water quality objective of 0.05 mg/l free cyanide.

Monitoring well MW11-23A and MW17-01 cyanide trends are coming from the TMA Cell #1. These concentrations are indicative of seepage. Detour has implemented a multi-phase investigation, which is ongoing, in the area of TMA Cell#1, to better understand the extent of the plume and install a pump back station to control seepage. Cell 1 West pumping was initiated in November of 2024, with ongoing monitoring to evaluate the effectiveness of the pumping system.

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 site.

Detour has implemented an adaptive management approach for groundwater. Anytime a parameter is above 10 times the provincial water quality objective (PWQO), an investigation is initiated to determine additional mitigation measures. The PWQO for free cyanide in ground water is 0.050 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 2024 report and cyanide concentrations in groundwater, which are generally below 0.022 mg/l free cyanide, with the exception of monitoring well MW11-23A and MW17-01 which had average free cyanide concentrations of 0.038 mg/l and 0.048 respectively (assuming a relation of 2:1 between WAD cyanide and free cyanide). Detour does not have seepage that has caused cyanide concentration of groundwater to rise above levels protective of beneficial use.

Detour does not use mill tailings as underground backfill.

Standard of Practice 4.7

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

The operation is

in full compliance with

in substantial compliance with

not in compliance with

Standard of Practice 4.7

Summarize the Basis for this Finding or Deficiencies Identified:

Spill prevention and containment measures are provided for cyanide mixing, distribution, and process solution tanks, remain unchanged since the last recertification audit. The cyanide mixing and distribution tanks, barren tank, 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 from the initial and previous certification audits.

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.

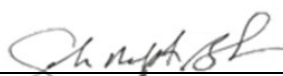
The secondary containment systems are inspected daily as part of the process facilities inspection system. The auditors observed that the concrete containment systems were in good condition at the time of the field inspection of audit.

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

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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.

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 "windows" 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 good condition 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 pump box. 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.

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.

This requirement was verified through field observations and interviews with process and maintenance personnel.

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 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.

The drainage system from the plant area directs all meteoric water to the west pond and sediment pond #2, where any cyanide solution release 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 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.

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 wrap 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, High-Density Polyethylene (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 are a braided 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.

Standard of Practice 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 with** **Standard of Practice 4.8**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

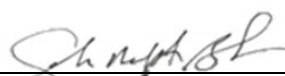
The initial certification and previous recertification audits Detour process plant facilities were constructed by AMEC. Quality control and quality assurance (QA/QC) programs have been implemented during the initial construction of cyanide facilities at Detour; however, the complete records of the QA/QC 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 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. This remains unchanged since the previous recertification audit.

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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 2 2023, 2024 and 2025 construction. The TMA Cell 2 2025 construction report was not completed at the time of this recertification audit.

The initial certification and previous recertification audits 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 2 for 2023 and 2024.

The previous recertification audit reported that Detour has not retained a complete set of QA/QC records for cyanide facilities constructed prior to the initial certification audit. QA/QC records were only available for the cyanide mixing area and for new facilities constructed during this recertification period. Records for the rest of the cyanide facilities (i.e. process plant, tailings pipeline corridor and the TMA area Cell 1) were not available for review by the auditors during the field portion of the audit. To be in compliance with the requirements of the Code, Detour has provided an alternate demonstration of QA/QC programs.

For cyanide facilities constructed during this recertification audit cycle, Detour has retained quality control and quality assurance records.

Construction records (as-built) of cyanide facilities constructed prior to the initial certification audit, including sign-off by construction engineer that the facilities have been built as show in design drawings, were not available for review by the auditors during the field portion of the audit. Many of the drawings sighted were issued for construction purposes. To be in compliance with the requirements of the Code, Detour has provided an alternate demonstration of as-built certification.

For cyanide facilities constructed during this recertification period, qualified engineering companies performed the QA/QC inspections and reviews during construction and prepared the final construction reports certifying that the facilities were constructed in accordance with the design drawings and technical specifications.

The auditors reviewed records of construction reports for the new cyanide facilities (i.e. TMA dam Cell 2 2023 and 2024 reports).

Standard of Practice 4.9 **Implement monitoring programs to evaluate the effects of cyanide use on wildlife, and surface and ground water quality.**

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

Summarize the Basis for this Finding or 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 standard operating procedures for surface and groundwater sampling that address 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 an SOP 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. The auditors reviewed letters of certification to verify compliance.

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 weekly, 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 determined to be appropriate by the auditors. It is the professional opinion of the auditors that Detour conducts monitoring at frequencies adequately to identify any issues and implement changes in a timely manner.

PRINCIPLE 5 - DECOMMISSIONING

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

Standard 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 with** **Standard of Practice 5.1**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

Detour has an approved Closure Plan Amendment 2.1 dated August 2021. The updated version of the Closure Plan (Amendment 4) was September 2025. The closure plan includes the requirements of the Cyanide Code, as well as references on decommissioning activities that will be conducted. The current life of mine is until 2052.

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. Detour has updated the plan multiple time with the most recent version, dated December 2025, that describes the procedures to decommission cyanide facilities at the cessation of operations. This conceptual plan was updated to include the use of together with Closure Plan Amendment 4. 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 that decontamination activities will be conducted in accordance with SOPs for Cyanide Equipment Decontamination to ICMI standards for decontamination.

In addition, Closure Plan Amendment 4 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.

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.

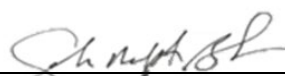
The Closure Plan Amendment #4 Version 1 and the closure cost estimate includes a general implementation schedule, which will continue being refined as Detour approaches the closure period.

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.

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,

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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 December 2025. 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 revised the Closure Plan multiple times with the final revision in September 2025.

Standard of Practice 5.2 **Establish an assurance mechanism capable of fully funding cyanide-related decommissioning activities.**

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

Summarize the Basis for this Finding or 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 #4 was estimated in CAD\$ 443 million, including decommissioning activities.

The Story Environmental 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\$ 15.5 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.

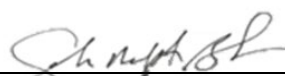
In addition, Detour Lake Mine updates on a quarterly basis its Asset Retirement Obligation (ARO) cost estimate, including cyanide facilities decommissioning costs, which is reported to Agnico Eagle Corporate Office Financial area. The most recent ARO cost estimate for the third quarter of 2025 is CAD\$ 194 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 4 (CAD\$ 443 million) is because not all facilities included in the estimate are not yet developed. Existing facilities are fully bonded under the amount of CAD\$ 231.94 million.

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PRINCIPLE 6 – WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

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

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

Summarize the Basis for this Finding or Deficiencies Identified:

Detour has SOPs, as well as manuals, plans, and guidelines that describe the management and operation of cyanide facilities to help minimize the possibility of worker exposure to cyanide. The SOPs and manuals have been developed for the cyanide storage areas, mill areas, detox circuit, and Tailings Storage Facility (TSF) areas. They provide detailed information about the risks involved with each task (including mixing, plant operations, entry into confined spaces, and equipment decontamination) and adequately describe safe work practices.

The SOPs detail task specific PPE requirements to conduct the tasks, with consideration of safety and potential hazards associated with the job, including step-by-step instructions for task completion, as well as drawings and/or photographs. Verification of the written procedures included review of the specific task, plans and worker interviews.

Detour has established minimum requirements for entry into the mill building. These requirements are posted at each entrance and include a hard hat with reflective striping, safety glasses, safety boots, Class 3 high visibility reflective clothing, gloves, and hearing protection. In addition, each SOP details the specific PPE requirements to complete the work. Cyanide related tasks, such as cyanide mixing, work in the ILR area, or maintenance of cyanide systems require the use of a full faced respirator with protective covers for chemical splash resistance, rubber chemical boots, a chemical resistant suit with hood, and rubber chemical gloves in addition to hearing protection and hard hat use which are also required. The procedures also address the pre-work inspection requirements, such as inspection and testing of the eyewash and safety showers.

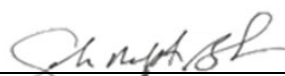
Detour considers worker input into the development of procedures through various mechanisms and encourages an open-door policy for employees to provide input into operations including health and safety matters. Workers have direct communication between supervisors and operators during daily toolbox meetings, including regular participation by senior process personnel.

The process trainers spend time with each crew soliciting input on procedures to help standardize and optimize the procedures. Peer-to-peer training occurs for all new employees or employees being trained in a new area. The Detour shift toolbox meeting form also includes sections in which input from employees may be solicited or offered.

Detour also supports a Joint Health & Safety (JH&S) committee, comprised of employees from various departments and backgrounds across the mine. Procedure revisions require approval by at least one member of the JH&S, among others.

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Standard of Practice 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 with
- in substantial compliance with
- not in compliance with

Standard of Practice 6.2

Summarize the Basis for this Finding or Deficiencies Identified:

Detour has determined the appropriate pH for limiting the generation of HCN gas during cyanide mixing and production activities. Operational procedures describe the pH targets in the various process circuits. The pH throughout the process plant is continuously measured and recorded. Trends for pH were reviewed on the process control system to verify that the pH was maintained as recommended. The procedure for mixing sodium cyanide requires a pH greater than 11 in the cyanide mixing tank prior to beginning the mixing process. The leach circuit requires a minimum pH of 10.5 in the process solution, which is measured at the pre-leach thickener

Detour has identified areas where workers may be exposed to cyanide more than 10 parts per million on an instantaneous basis and 4.7 parts per million continuously over an 8-hour period. HCN levels are monitored in the field and on the HMI using fixed position monitors, including a combination of Boreal Lasers and MSA gas monitors. These sensors are mounted in all areas of the plant in which HCN exposures are possible, including the SAG Mills, ILR, trash screens, leach tanks, tails pump box, CIP, carbon screens, sumps, the strip vessel, barren solution tank, electrowinning, and the cyanide destruction circuit. The site also uses personal gas detectors, as well as multi-gas instruments for HCN detection.

At Detour, if ambient HCN concentrations above 2.5 ppm are detected, a local strobe light is activated. The strobe continues to flash, and an audible alarm will sound if HCN levels exceed 4.7 ppm. Detour has a SOP for responding to the detection of high HCN which requires further investigation of HCN levels above 2.5 ppm but below 4.7 ppm. If the level exceeds 4.7 ppm but is below 10 ppm HCN on an instantaneous basis, the area is evacuated. If area access is required, it must be approved by management and only trained and authorized personnel may enter the area and must be under supplied air. If HCN is measured above 25 ppm on two or more personal and/or stationary monitors, the plant is evacuated. Any alarm greater than or equal to 10 ppm requires a formal investigation.

Hydrogen cyanide monitoring equipment is maintained, tested and calibrated as directed by the manufacturer, and records are retained.

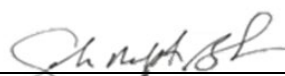
The Electrical and Instrumentation (E&I) group is responsible for the calibration of the fixed HCN monitors. Calibration is conducted on a semi-monthly basis in accordance with manufacturer's instructions for the MSA units and every six months for the Boreal Lasers. The SAP system automatically generates a work order for the calibration reminder.

The calibration and maintenance schedule are considered adequate to meet the manufacturer's recommendation for maintenance. The calibration records for multiple units were reviewed and found to be complete over the recertification period. The audible and visual alarms are also tested with unit calibration.

The handheld gas monitors are used for work in cyanide areas, as well as for tasks such as working in confined spaces or entering an area after HCN levels were detected above 4.7 ppm. Process area

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employees who work in cyanide areas have a detector assigned to them, as well as having extra units available for visitors or in the event that a unit fails. Each personal monitor is bump tested prior to use in the field. Detour also has several multi-gas units on site. The multi-gas units are docked and calibrated automatically. The supplier monitors both the personal detectors and the multi-gas units, as well as calibration gas tank levels via a network connection to their system. The records for the handheld units are also retained at site.

During the field inspection, it was observed that appropriate signage is displayed throughout the process areas, at the plant entrances, and throughout the various cyanide facilities, including the tailings pipeline, to alert personnel to the presence of cyanide, specific access restrictions, and the required PPE for the area. Standard PPE, as well as task specific PPE for work in any cyanide areas are clearly identified in the SOPs. In addition to identification of cyanide areas and PPE requirements, signs are posted, prohibiting eating, drinking, smoking, vaping, or open flames, where appropriate.

During the recertification period, cyanide was purchased exclusively from Draslovka. Since the requirement to dye high strength cyanide was implemented, cyanide from the Memphis plant has included colorant dye.

Detour has installed showers, eye wash stations and fire extinguishers at strategic locations throughout the operation in all areas where there is a potential for exposure to cyanide. Additionally, bottles of eye wash solution are located at key locations throughout the mill area and are regularly checked for condition and expiration date as part of routine inspections. During the sodium cyanide mixing process, operators were observed to check the condition and operation of safety showers, eyewash stations, and fire extinguisher prior to commencing with a cyanide mix.

Showers and eye wash stations are inspected and tested weekly at a minimum or prior to beginning tasks that have the potential for cyanide exposure (examples: cyanide preparation and opening a pipeline for maintenance). The combination safety shower and eyewash station units are integrated with the process control system to alarm when activated, as well as to alarm if an inspection, including flow test, has not been performed within the prescribed period. Fire extinguishers are inspected monthly by process operations. The auditors checked extinguishers at various locations throughout the mill to confirm they are an acceptable type for use with cyanide. Extinguishers are fitted with inspection tags to document the monthly checks. Fire extinguishers also include a tag for annual inspections and testing by a qualified contractor.

The operation has identified tanks and pipes that contain cyanide solution to alert workers of their contents. Pipes containing cyanide are labeled as containing cyanide solution and flow direction is indicated.

In addition to labels and flow direction markers, concentrated cyanide lines are painted purple for ease of identification. Cyanide storage and process tanks are marked as containing cyanide.

Detour has safety data sheets (SDS) available in both electronic and hard copy for solid briquettes, as well as various concentrations for sodium cyanide solutions. The safety data sheets include information regarding first aids procedures for all areas where cyanide is managed.

All information relating to cyanide management including SDS information, SOPs and emergency response plans are provided in English, the language of the workforce at the site.

Detour utilizes an Incident Management Plan and Incident Reporting and Investigation procedure which describe the actions to be taken in the event of an incident, how it will be notified, and how the staff proceed to control the situation. Subsequently, an investigation of the incident is done to identify root causes and ensure that corrective actions are determined and implemented.

During the recertification period Detour had two minor incidents which required internal reporting and investigation. Both of the incidents were found to have followed Detour’s procedures for incident management, reporting, and investigation.

Standard of Practice 6.3 **Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.**

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

Summarize the Basis for this Finding or Deficiencies Identified:

Detour has an adequate number of antidote kits, water, oxygen, resuscitators (bag valve masks), radios, telephones, and alarms in the process plant and clinic. Kits containing oxygen bottles, resuscitators, and basic items required for Cardiopulmonary resuscitation (CPR) are located in strategic places at the process plant where reagent grade cyanide is present. The kits are sealed with a breakaway security seal to help ensure that the kit has not been tampered with since its last inspection. Self-contained breathing apparatuses (SCBAs) were located in an easily accessible location in the plant for quick access by emergency responders. Additional SCBAs were available in the Hazardous Materials (HAZMAT) response trailer and the emergency response building and vehicles. The locations of the emergency equipment were deemed to be appropriate for the operation.

Operators are required to carry a radio while performing their tasks and a channel with a dedicated emergency radio frequency is available, if needed. The emergency response team also has a closed channel for team communications. High risk activities, such as entering the cyanide mixing and storage containment or the ILR area require approval, communication with security prior to entering, continuous video monitoring by a dedicated security officer for the duration of the task, as well as positive radio contact by security with all persons involved at five-minute intervals until the area is cleared.

A speaker system is located at key areas throughout the mill and plant area and could be used as an alternate form of communication to personnel and the emergency response team in the event of an emergency.

All fixed HCN monitors are equipped with an audible and visual alarm system. The alarms also report to the HMI, notifying the control room operator.

The CYANOKIT (hydroxocobalamin) is the approved cyanide antidote kit in Ontario. Cyanide antidote kits include the expiration date and are located within temperature-controlled locations, held at 25°C, at the Detour Medical Clinic, Lady Minto Hospital, and Timmins District Hospital.

Medical oxygen is available in the oxygen kits, the clinic, and the emergency response vehicles. First aid equipment is checked regularly by operations personnel, security personnel, and emergency response personnel. Security performs daily checks to verify that the oxygen kits are present during area rounds. The status of each kit is electronically logged to verify the inspection.

Cyanide antidote kits are inspected monthly to confirm that the kits are accounted for and that they have not expired. Operations personnel are responsible for inspecting fire extinguishers and safety showers/eyewash stations.

Showers and eyewash stations are located at strategic areas of the plant where cyanide and other chemicals are used. In addition, there were several eyewash stations in the plant and elsewhere where bottles of eyewash solution or wall mounted eyewash units are maintained in the event of an emergency.

Detour has an Incident Management Plan (IMP) specific to their operations. The IMP includes communication roles and responsibilities, evacuation procedures, required notifications, reporting procedures, incident categories and risk assessment. The IMP contains additional procedures and plans specific to cyanide response, addressing the requirements specifically for the emergency response team. Sections within the IMP specifically address emergency response procedures related to cyanide releases and cyanide exposures. The IMP and supporting documents detail the emergency response procedures to address exposure to cyanide through ingestion, inhalation, or dermal routes.

The IMP has been developed for several scenarios including transportation incidents, releases during unloading, releases during fires and explosions, pipe, valve and tank ruptures, overtopping of ponds, power outages and pump failures, uncontrolled seepage, failure of cyanide treatment and failure of tailings impoundments. Detour also utilizes tailings-specific emergency response documents to address all aspects related to the tailings management area, including response to cyanide releases.

Detour has its own onsite capability to provide first aid and medical assistance to workers exposed to cyanide. The mine has a fully staffed emergency response team (ERT) covering all rotations and shifts. The ERT trains year-round. Training includes first responder/first aid with CPR/ automated external defibrillators (AED) training, HAZMAT training, confined space rescue, firefighting, and technical rescue (extrication, ropes, etc.).

Two physician's assistants (PA) also form part of the ERT and provide full-time coverage in the medical clinic. The PA's are qualified to provide emergency medical assistance. In the event of an emergency, the PA's would follow the Cyanide Poisoning Emergency Medical Directive Procedure, which is included in the IMP. The medic may need to transport more critical patients to off-site facilities such as the Lady Minto or Timmins Hospitals, via either air or ground ambulance. However, prior to transport, patients exposed to cyanide must be treated by the ERT following the procedure for Hazardous Material Decontamination and Transportation for Cyanide Exposure. If the on-duty medic is required to leave site, the second medic will rotate into the clinic to continue site coverage.

The mine has AEDs in different locations throughout the site, as well as the medical clinic, which has a well-equipped treatment aid room containing the cyanide antidote kits, oxygen, advanced airway and intravenous/intraosseous access equipment, medications for advanced life support, and a manual defibrillator. The site has a rescue vehicle (ambulance) that is equipped to transport patients, as well as modified technical rescue vehicles capable of assisting in emergency response and patient transport.

Detour maintains formal arrangements with medical facilities regarding the potential to further evaluate patients that have been exposed to cyanide and that have been previously stabilized at the site medical facilities. The offsite facilities would not likely be treating victims directly for cyanide exposure, as initial treatment would have been initiated by the ERT and site medic. Detour has determined that its medical facilities have qualified staff, adequate equipment, and expertise to respond effectively, however, if offsite support is required, Detour has agreements with the hospitals in both Cochrane and Timmins.

PRINCIPLE 7 – EMERGENCY RESPONSE

Protect communities and the environment through the development of emergency response strategies and capabilities.

Standard of Practice 7.1 Prepare detailed emergency response plans for potential cyanide releases.

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

Summarize the Basis for this Finding or Deficiencies Identified:

Detour has an IMP, which includes the Cyanide Emergency Response Plan, the Tailings and Water Management Infrastructure Emergency Preparedness and Response Plan, and the TSF Operation, Maintenance and Surveillance (OMS) Manuals, and that set out emergency response procedures for the entire mine site including cyanide releases. Procedures for initial response, first aid and spill response, and reporting are provided in the IMP.

The IMP and its subcomponents noted above consider different scenarios appropriate to the site-specific circumstances and include procedures to respond to emergency incidents including cyanide releases. Emergency scenarios considered include releases during transportation, fires and explosions; pipe, valve and tank ruptures; overtopping of ponds; power outages and pump failures; uncontrolled seepage; failure of cyanide treatment, destruction or recovery systems; and failure of tailings impoundments.

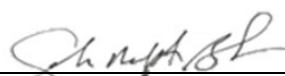
In addition to the IMP, further guidance is provided within the OMS, which provides specific procedures and guidance in the event of emergency situations and failures involving the TMA. The OMS considers specific scenarios such as earthquakes, excessive spillway flows, embankment overtopping, excessive seepage, embankment failures and cracking, embankment movement, sinkholes, and instrument readings.

An agreement between Detour and their cyanide supplier Draslovka is in place. Draslovka and their transporters are responsible for shipping cyanide to site. This responsibility extends to consideration of transport routes, storage and packaging of sodium cyanide briquettes, the condition of transport vehicles and response in the event of an emergency or release during transport. As noted above, the Draslovka supply chain was certified in full compliance with the Code during the most recent audit.

The IMP describes specific response actions. In the event of an emergency involving cyanide release, the IMP, Cyanide Emergency Response Plan, and OMS provide for specific actions to be undertaken in the event of a release scenario. The IMP details responses specific to cyanide spills or leaks including mill solution and reagent spills and makes provision for initial response, first aid, spill reporting contacts and spill control and cleanup. The OMS provides specific procedures related to the Tailings Management Area.

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Standard of Practice 7.2 **Involve site personnel and stakeholders in the planning process.**

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

Summarize the Basis for this Finding or Deficiencies Identified:

Detour solicits the input of its workforce in their emergency response planning documents. Among the mechanisms the operation uses to obtain input from the workers, including in emergency response planning, are the daily pre-work meetings and the mock scenario debriefings. Since all employees who work around cyanide are also trained in basic cyanide emergency response, those employees can provide feedback and input in the process.

Despite not having designated responsibilities under the plan, Detour has engaged reagent suppliers, to provide input into emergency response planning and mock drills. The site maintains frequent communication with the external responders in the nearby communities and with the First Nations groups where emergency procedures are 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.

The mine is in regular communication with stakeholders such as Cochrane Fire, Cochrane EMS, and Ornge Air Ambulance who are kept apprised of Detour's IMP with any updates provided to them on a regular basis. Detour periodically engages external stakeholders for mutual aid response drills. In addition, Detour regularly coordinates with local hospitals, notifying them of changes related to emergency response planning, as well as performing an annual review and communicating any changes to medical staff as a result of the review.

Detour is located approximately 187 km from the nearest town of Cochrane and cyanide is transported to site in a solid form in ISO containers. Despite the remote location and low risk of an event affecting the community, Detour has engaged with the local community to provide information on mine activities and regularly coordinates with local emergency services who would support Detour or Draslovka in the event of an emergency, depending on the location of the incident. The town of Cochrane was included in the detailed route analysis for delivery, as well a 2022 evaluation considering a highway extension in Cochrane.

There are four primary First Nations groups with traditional land use ties who are also consulted regularly. Detour has formal written agreements with three groups outlining Detour's commitments, including the safe use of cyanide. Annual meetings with the various First Nations groups also take place as a joint exercise, or individually, if required, so that information can be conveyed from Detour and so that the participants may engage with mine personnel about all aspects of the operation, including the use of cyanide.

Detour interacts with the specific elements of the potentially affected communities through regular communications with Cochrane Fire and EMS, the local hospitals, and by periodically coordinating with other potentially affected parties.

Detour has on-site capabilities for dealing with all possible cyanide-related incident scenarios. As a volunteer emergency response team, Detour recognizes the risk of insufficient personnel responding to an incident and takes proactive measures, such as incentives, to ensure adequate personnel are available. As such, Detour does not rely on external entities having responsibilities or roles in the emergency response plan.

Detour periodically engages Cochrane Fire and EMS, the hospitals, etc. and encourages their participation in mock drills, including the debrief process, though these parties do not have a formal role in the emergency response planning process. The IMP is reviewed and updated at least once a year or when there is a significant change requiring additional reviews or revisions. The updated IMP is provided to the relevant parties, as appropriate.

Detour also maintains a social engagement program that allows communication and feedback between communities, stakeholders, and the mine. This includes topics such as transportation and use of sodium cyanide and provides general emergency response information.

Standard of Practice 7.3 **Designate appropriate personnel and commit necessary equipment and resources for emergency response.**

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

Summarize the Basis for this Finding or Deficiencies Identified:

The IMP specifies the formal incident command structure to be followed in the event of an emergency. It also designates an alternate for each role when the primary is not on site. Further responsibilities are delegated, as needed, based on the ERT members on-site during the incident.

The IMP matrix identifies the role of the ERT members, who are listed within the ERT Training Matrix. The ERT consists full-time and volunteer members. At the time of the audit, Detour had approximately 65 ERT members. The number of ERT members available at any given time may vary, but typically three (3) full-time personnel and approximately 20 volunteers are on site.

The ERT roles, responsibilities, and minimum requirements are clearly defined with a procedure that sets out training requirements for the ERT. It is the responsibility of the ERT Coordinators to ensure that training is provided and maintained. All responders undergo the same training. The ERT Coordinators have overall responsibility to ensure that the ERT is current and viable.

The IMP includes office and 24-hour cell phone numbers for the Emergency Response Incident Commanders as well as the Medic's office. Asset Protections receives the initial emergency call and communicates it to the ERT members via an internal notification system.

The IMP and supporting documents describe the roles and responsibilities of the Incident Commander, the medics and ERT members. The plans describe the necessary list of emergency response equipment for each area where cyanide is used.

The ERT procedures include requirements for inspection of both emergency response equipment and PPE, identifying inspection procedures for HAZMAT equipment, SCBA equipment, air tanks, compressors, and the decontamination station. Ambulances are inspected daily.

The IMP indicates that the role of external responders is to assist with hospital arrangements, patient transportation, and off-site evacuations, if required; however, Detour has not assigned external responders a role on the site unless it is determined that off-site evacuation is needed.

While Detour does not rely on off-site responders for cyanide-related emergencies, they have formal arrangements with off-site medical facilities in Cochrane and Timmins regarding the potential to treat patients that have been exposed to cyanide.

They also have agreements with Orange Air Ambulance and Cochrane Fire and EMS, if off-site

transport is required. Detour has adequate staff, equipment, and expertise to respond effectively to emergencies.

Detour has conducted at least two mock drills per year during the recertification period. Despite no formal role in site-based emergency response, during one drill in 2024 and one drill in 2025, Detour elected to engage external responders to participate in the scenarios.

Standard of Practice 7.4 **Develop procedures for internal and external emergency notification and reporting.**

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

Summarize the Basis for this Finding or Deficiencies Identified:

The IMP includes procedures and an up-to-date contact information table to notify regulatory agencies, civil defense, municipal and provincial authorities, the cyanide supplier, off-site fire departments and police, off-site medical facilities, air and ground ambulance/red cross, ICMI, and other stakeholders.

The Plan also has an up-to-date list of Detour management staff. The auditor reviewed the list of Detour personnel with the interviewees to confirm that the personnel listed were still valid in the role for which they were indicated.

The IMP includes a list of contact information for community representatives in the nearby areas of Cochrane and Timmins. The plan also addresses regulatory notifications, including for ICMI, and provides the appropriate contact information. In the event of an incident, the Crisis Management Team, in consultation with the Incident Command Team, will notify affected parties in local communities, as necessary. Procedures for notifying outside agencies and the media are also provided in the IMP.

The auditor verified the responsibilities of the Communications Advisor which includes the coordination with potentially affected communities to inform them about any significant incident and recovery actions implemented. Reviewing the mock drill debrief notes, it was observed that the communication requirements outlined in the IMP were followed (simulated) during the scenario, where required.

The IMP indicates that ICMI is to be notified in the event of a significant incident. The IMP provides the necessary contact information and scenarios in which ICMI must be notified. No significant cyanide events took place during the recertification period.

Standard of Practice 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 with** **Standard of Practice 7.5**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The IMP provides procedures in the event of cyanide release and addresses cyanide recovery and remediation, if necessary. The IMP details the requirements for sampling and disposal of any contaminated material from a cyanide release. The plan requires that any cyanide containing solutions spilled within the process area but outside of containment be cleaned up with an appropriate vacuum truck with the contents disposed of in the TMA

Treatment with chemicals for neutralization or decontamination is explicitly prohibited in Detour’s response procedures. Cyanide impacted soils are to be excavated to depth of impact and all contaminated material deposited into the TMA until cyanide levels in the impacted area are below the threshold levels indicated, with sampling occurring per the requirements specified in the Plan. The Plan specifically notes that chemicals are not to be used to treat liquid or semi-liquid cyanide spills. Reportable quantities of cyanide and other items are detailed in the site plans.

Drinking water is prepared through onsite generation of potable water. In the event of an emergency, significant quantities of potable water are stored at site. Additional water could be trucked to site, if necessary.

The IMP 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’s IMP has established monitoring measures for affected areas in the event of a cyanide spill. The IMP 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 analyses and detection limits for total, WAD, and free cyanide. Samples are to be analyzed on a rush basis at an external laboratory.

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

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

Summarize the Basis for this Finding or Deficiencies Identified:

The IMP is revised at least once a year; however, some elements are regularly reviewed, such as the response personnel and contact telephone numbers, or every time there are significant changes and new information. Updates may also be made following an incident or accident, mock drills, or changes in compliance requirements or regulations. The latest approved version of the IMP was issued in April 2025, following the annual review. Ongoing updates are in progress.

The IMP includes a table for the various revisions that allows Detour to easily monitor and track changes. The table provides a means of highlighting significant updates or edits to the document.

Detour conducts mock drills at least bi-annually. The drills are based on likely release/exposure scenarios to test the response procedures and incorporate lessons learned from the drills into its response planning. Records of these drills are kept with the Emergency Response Department and were reviewed during the audit. Documentation from each drill includes detailed incident records, photos, strengths, weaknesses, lessons learned, and corrective actions. Follow up correspondence verifying that identified corrective actions have been implemented was also reviewed.

Additional, formal mock drills were conducted, as well as cyanide considerations incorporated into the routine training the ERT completes. Auditors reviewed the documentation for the scenarios, including incident setup, the sequence of events during the incident, the response details, the post-incident debrief, and the lessons learned. The scenarios appeared to have been managed with a high degree of professionalism. The files included timestamped, detailed incident minutes of the response actions, a detailed and timestamped call log, a thorough debrief, and documentation of lessons learned with input from all participants.

The IMP includes a formal "lessons learned" report to be used as part of a review session held following an incident. This process and report would be utilized following an actual cyanide-related incident, but it is also used to capture lessons learned after mock drills. Changes in compliance requirements or regulations would also trigger revisions to the Plans.

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, including non-cyanide related drills that triggered revisions to the IMP as a result of the after action debriefs from those scenarios.

PRINCIPLE 8 – TRAINING

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

Standard of Practice 8.1 **Train workers to understand the hazards associated with cyanide use.**

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

Summarize the Basis for this Finding or Deficiencies Identified:

All Detour personnel and contractors 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. Cyanide use and safety are addressed in these training modules, as well as in area and task-specific training.

The Detour Training Department maintains a training matrix for contractors and employees with all training courses provided related to Cyanide. It also has a training matrix for employees that details which training should be received, depending on their role. The training matrix includes personnel from all departments. The auditor verified the cyanide training records for 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 for all personnel and contractors that could be exposed to Cyanide. For other workers with functions and roles that do not require them to be in contact with cyanide, the mine provides short refresher courses that include some basic information on Cyanide hazards. Verification for this standard was done by interviews with personnel from multiple departments and a review of training records.

Detour utilizes a web-based training program for employees to track necessary training and reevaluations required for each employee. Process Plant Safety and Cyanide Awareness refresher courses are required on an annual basis.

The auditor verified that training records, including initial cyanide hazard training, area-specific training, and refresher training related to cyanide for personnel spanning multiple departments, as well as and contractors. Records are retained based on regulatory requirements, in the form of hard copies, as well as an electronic copy. 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.

Upon completion of a training course, an employee's hard copy records are entered into the web-based system to serve as the official training record.

Standard of Practice 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 with** **Standard of Practice 8.2**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

New process employees and any worker with cyanide related tasks receive approximately 96 hours of specific process plant orientation training, which includes elements specific to the use of cyanide in the process. Employee specific training includes aspects such as cyanide awareness, response, process information, hydrogen cyanide monitor and alarm operation, and location of cyanide safety equipment. This training directs staff to relevant standard operating procedures and area-specific training resources. The cyanide training includes key information regarding symptoms of cyanide poisoning and first aid for cyanide poisoning training, as well as facts about sodium cyanide.

After completing the initial training, area/task specific training is provided by the Process Trainer and Supervisors on operating procedures including both general procedures applicable to all areas, as well as those specific to a task. Employees perform work with supervision (peer-to-peer) prior to being allowed to work on their own. Regular Job Task Observations are completed to ensure the employee understands and is executing tasks according to procedure. To conduct work on their own, employees must pass a circuit test, which includes both a written and field component, meant to demonstrate an employee's mastery of the circuit. Training records are maintained for each employee. This requirement was verified through discussions with the Process Trainer, review of the new hire training records, and a sample of training records from the recertification period.

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

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. Training is supported by experienced employees with peer-to-peer training, as well as by the training department.

All personnel directly involved in cyanide handling are required to receive training on how to perform their assigned tasks with minimum risk to worker health and safety, prior to working with cyanide.

Employees must receive the corresponding task training before being allowed to work with cyanide in an unsupervised manner. They must also successfully complete the training before they work independently, including documentation and sign-off that all training has been completed. Verification was done by interviews with field personnel and a review of employee training records. 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.

Detour requires and provides refresher training for safe cyanide handling, first aid for cyanide exposure, 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 web-based training program requires annual refresher training which addresses the physical and chemical characteristics of cyanide, cyanide handling and 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 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. While all reviewed employee records had completed their initial cyanide training, not all employees were up to date on cyanide-related refresher training courses or procedure reviews. This includes employees from multiple departments that are required to undergo annual refresher training.

To evaluate the effectiveness of cyanide-related training, the trainers periodically evaluate the knowledge of the employee through a combination of written and practical exams to demonstrate understanding of the material covered. A certificate of completion is provided after confirming the relevant standard operating procedure is understood. After training is complete, Detour supervisors continue to observe new employees to determine when they are ready to work independently.

Cyanide training records for Detour are retained for all employees, with hard copies and electronic copies retained in the employee files maintained by the training department for the duration of employment. A third-party service retains training records for contractors and visitors. Training records include the name of the employee receiving the training, name of the trainer, the topics covered, and confirmation that the employee demonstrated sufficient knowledge in every topic to be considered trained, as well as the date. Training requirements were verified with through interviews with supervisors and field personnel and by reviewing training programs and records.

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

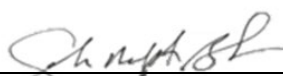
The operation is **in full compliance with** **Standard of Practice 8.3**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or 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. This includes decontamination specifically for cyanide exposure victims or following a cyanide release and is in addition to training in decontamination procedures prior to performing maintenance work or as part of decommissioning activities. In addition to receiving training for Cyanide Awareness, all process personnel must receive training in Responding to Detection of High HCN Gas and/or Cyanide Solution Leaks, which covers the

Detour Lake Mine

Name of Mine



Signature of Lead Auditor

May 27, 2026

Date

evacuation procedures in cause of a cyanide release.

The Cyanide Emergency Response plan covers cyanide release procedures, first aid for exposures, as well as control and cleaning measures for environmental releases.

The emergency response coordinators, medics and ERT members are all trained in the Emergency Response Plan as part of an annual training program and schedule which includes HAZMAT response and cyanide-specific emergency response.

Emergency Response Team Roles, Responsibilities, and Minimum Requirements are identified, including training requirements for the ERT. It is the responsibility of the ERT Coordinators to ensure that training is provided and maintained. All responders undergo the same training. The ERT Coordinators have overall responsibility to ensure that the current ERT is current and viable.

The Emergency Response Team is made up of dedicated and volunteer members who have committed to the program and trained in the use of necessary response equipment, such as SCBAs, HAZMAT suits, decontamination equipment, extrication equipment, and firefighting equipment. Emergency responders are available on all shifts. Knowledge and competence level is assessed through tests, continuous training, mock drills, and formal recertification for certain training.

Detour is 187 km from the nearest community of Cochrane, ON. As such, they have demonstrated 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 without reliance on external responders.

Although Detour does not require off-site emergency response support, it has established formalized agreements with off-site medical facilities in Cochrane and Timmins regarding the potential to treat patients that have been exposed to cyanide, as well as to aid in the transport of patients to offsite facilities by ground or air ambulance. Detour has provided training for local emergency responders in Cochrane for familiarization and review.

Refresher training for cyanide events is completed as part of the site training and through the mock drills. Training requirements from the training matrix are routinely monitored and incorporated into the mock drills, and refresher training is scheduled as required.

Detour personnel receive annual general cyanide and areas/task specific refresher training.

Training topics include cyanide management, safe cyanide handling, first aid for cyanide exposure, cyanide SDS, general emergency response, the Cyanide Code, cyanide management, equipment decontamination, and plant emergency stop, among others.

Verification was conducted through interviews with process and emergency response personnel, as well as through a review of training records. Records of emergency response training are retained by the Training Department and the Emergency Response Team. These include training conducted by internal and external parties.

The auditor verified training for several ERT members conducted during the recertification period. Training topics included cyanide response management, first aid for cyanide exposure, use of portable HCN monitors, the Cyanide Code, equipment decontamination, spill remediation, plant emergency stop, among others. The training records include the name of the employee and trainer, the date of training, the topics covered, and an evaluation.

Refresher training for cyanide events is conducted as part of regular site training and mock drills. Training requirements from the training matrix are routinely monitored and refresher training is scheduled as required. Detour personnel receive annual general cyanide and areas/task specific refresher training. Verification was conducted through interviews with personnel from multiple departments and a review of relevant training records.

PRINCIPLE 9 – DIALOGUE & DISCLOSURE

Engage in public consultation and disclosure.

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

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

Summarize the Basis for this Finding or Deficiencies Identified:

Detour maintains communication through annual meetings on operations at the mine. Most 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 First Nations groups is preservation of the area for traditional land uses, such as hunting, fishing, trapping, etc.

Detour produced 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 mining exposition in Timmins.

Detour has a formal requirement to maintain a regional environmental monitoring body, consisting of one representative each from four of the 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 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, including creating impact benefits agreements (IBA). 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 (email, phone, etc.) that is monitored for public comments. Office locations and email addresses are available to the public. Discussion during the personnel interviews indicated that employment inquiries have been received through these means of communications, but there have not been any community concerns noted. 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.

Standard of Practice 9.2 **Make appropriate operational and environmental information regarding cyanide available to stakeholders.**

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

Summarize the Basis for this Finding or Deficiencies Identified:

Detour distributes Responsible Cyanide Information to the neighboring communities of Cochrane and Timmins, ON and to the surrounding First Nations. They provide an annual report to the communities covering the aspects of environmental assessments and cyanide handling over the preceding year. Detour has provided a flyer to the communities regarding their commitment to the Cyanide Code and responsible cyanide management.

Detour regularly engages with the local communities regarding emergency response, despite Detour having no reliance on outside entities in the event of an emergency at site. The various emergency response agencies, including the local hospitals, receive communications and training opportunities for cyanide response. They also regularly update the formal agreements and are included in the annual review and distribution of the IMP.

Detour is required to report to all incidents to the Canadian authorities. The public may search regulatory websites for information made publicly available or request information regarding reportable incidents directly from the regulatory agencies who will disclose information according to policy and statutory requirements.

Agnico also publishes an annual sustainability report and a tailings summary report which address the use of cyanide at their sites, including Detour. The supporting data, including any cyanide related information, is also available on Agnico’s website and includes details for each site. The summary audit reports from the initial and recertification audits at Detour are also publicly available. A National Instrument (NI) 43-101 technical report for Detour was published in 2024, which provides technical and environmental information related to cyanide use at the site and is available to the public. These reports were reviewed and verified by the auditor.