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Agnico Eagle Mines – LaRonde Division

ICMC INITIAL CERTIFICATION SUMMARY AUDIT REPORT

Final report

February 19th, 2024

EEM PROJECT NUMBER: 22EMA105

SUBMITTED TO:

International Cyanide Management Institute
1400 "I" Street NW, Suite 550
Washington, D.C. 20005

and

Agnico Eagle Mines – LaRonde Division
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A handwritten signature in black ink, appearing to be 'C. Goulet', is written over a light blue horizontal line.

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LOCATION DETAIL AND DESCRIPTION OF OPERATION

LOCATION

The LaRonde Mining Complex is located on the territory of the municipalities of Rouyn-Noranda and Preissac in the Abitibi-Témiscamingue region of north-western Quebec, Canada. As shown in Figure 1, most of the facility is located on the territory of the municipality of Preissac, approximately 7 km from the Cadillac district of the city of Rouyn-Noranda.



Figure 1: Location of Agnico Eagles Mines Ltd’s LaRonde Division.

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GENERAL OPERATIONS OVERVIEW

The initial owner of the site, Dumagami Mines Ltd., began conducting exploration activities intermittently during the early 1960's up to the early 1980's. The initial mineshaft (shaft no. 1) was sunk in 1985 and the concentrator began operations in 1988. Initial production was 1350 metric tonnes per day.

Agnico Eagle Mines Limited (AEM) and Dumagami Mines Limited merged their operations in December 1989 and the mine was renamed the LaRonde Mine. In January 1990, following subsequent confirmation of reserves, the mine's production rate was increased to 1,800 metric tonnes per day. This new expansion included the installation of a new winch system and a new headframe, a concrete plant, a backfill system, and the construction of a ramp giving access to the surface. Exploration programs undertaken in 1990's led to more shafts, including Penna / shaft no. 3 which was sunk to a depth of 2,240 m.

The increase in reserves beyond 2,240 m depth required the sinking of a fourth shaft located 50 meters from the bottom of the Penna shaft. In 2009, an 835 m deep shaft, whose winch is located underground, was completed and the production of ore from the LaRonde mine extension began in 2011. Currently, the facility has a total ore processing capacity of 9,000 metric tonnes per day. Ore is treated in two (2) concentrators at the site: the LaRonde concentrator and the LZ5 concentrator, formerly the Lapa concentrator.

Since 2007, the LaRonde concentrator has been treating sulphide concentrate from AEM's Goldex Division, located in Val d'Or, (Qc). Concentrate is trucked in.

Between 2009 and 2018, the Lapa concentrator, which was built on the LaRonde site, processed ore from the AEM's Lapa mine located 11 km east from the LaRonde mine. The Lapa mine ceased operations in December 2018. Since then, the Lapa concentrator, renamed the LZ5 concentrator, exclusively processes ore from LaRonde's Zone 5 mine, located on the former Bousquet property.

Gold ore processing at the LaRonde concentrator involves primary/secondary crushing, flotation to recover copper and zinc concentrates, cyanide leaching, carbon-in-pulp gold recovery, stripping, electrowinning, and refining. The LaRonde concentrator has a processing capacity of 7,000 metric tonnes per day. The tailings from the process are directed to the cyanide destruction plant prior to being directed to the LaRonde paste back-fill plant and / or tailings disposal via a 16" HDPE line.

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Gold processing for the LZ5 concentrator is similar to the LaRonde process with the exception that no copper and zinc flotation occurs, and a portion of the tailings are directed to a satellite back-fill plant located near the LZ5 mine. This back-fill plant has its own cyanide destruction facility. The LZ5 concentrator has a processing capacity of 2,000 metric tonnes per day. Tailings pulp not sent to back-fill are directed to the LaRonde tailings filtration plant via a 10" HDPE line for filtration and disposal in tailings storage facility (TSF).

Tailings are thickened, filtered, and transported by truck to the new A4 extension tailings storage area. Approximately 25% of tailings are sent underground as back-fill while the remainder is directed to the tailings storage area.

Cyanide is purchased from Draslovka Mining Solutions (Draslovka), a Cyanide Code certified producer and distributor. Cyanide is delivered to the facility from Draslovka's bulk transloading facility located in Malartic, Qc, approximately 40km east of LaRonde. The facility typically receives between three to five deliveries per week.

Cyanide is received as briquettes, mixed in an International Organization for Standardization (ISO) compliant tank, and unloaded at the unloading area at the LaRonde concentrator that has been constructed on a concrete pad with sump directed to a cyanide detoxification facility. LaRonde worked with their supplier to design the offloading area. Concentrated cyanide is stored in three (3) tanks at the site:

- Tank PCRES03 - An 83,000L mix tank used to produce liquid cyanide from cyanide briquettes;
- Tank PCRES01 - An 83,000L distribution tank used supply the LaRonde and LZ5 concentrators; and,
- Tank 1392CUV02 - A 74,000L liquid cyanide dispensing tank at the LZ5 concentrator plant.

The destruction of residual cyanide occurs at the tailings reject from the concentrators and prior to entering the paste back-fill plants or being directed to the tailings disposal system. LaRonde uses the INCO process to convert Weak Acid Dissociable (WAD) cyanides into cyanates. This reaction occurs in the presence of SO₂, air (oxygen) and a dissolved copper catalyst (CuII) which, in LaRonde's case, is already in solution. Since this reaction forms acidity, the pH is controlled between 8 and 9 with lime to avoid the formation of HCN gas.

In 2021, in collaboration with Corem, a non-profit mining expertise and innovation centre, LaRonde conducted trials for a cyanide regeneration project plant which operates on the sulphidization acidification recovery technique. A second set of trials is set to occur in 2023.

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Although the project is not included in the scope of the present audit and was not operational at the time of the site visit, certain safety aspects of the test plant related to potential cyanide exposure were investigated. No findings were issued.

TAILINGS AND WATER MANAGEMENT

Since October 2022, the tailings produced by the two LaRonde mining complex concentrators have been sent to a tailings filtration plant to remove water and allow placement of tailings using loaders, trucks, bulldozers, and roller compactors. This allows for better tailings stability and more efficient and compact storage of tailings that will be produced until 2032. This will also reduce the environmental footprint of the tailings area and future closure costs.

Tailings are treated to reduce cyanide concentrations prior to being pumped to the filtration plant. The capacity of this plant is 10,000 metric tonnes of tailings per day, which is more than the ore processing capacity of the two concentrator plants combined. Annual tailings production is estimated at around 2,000,000 metric tonnes.

In order to manage the water removed from the tailings, a new pond, Cell 5, was built between 2020 and 2022. This cell has a surface area of approximately 55ha and is sealed with a Linear Low-Density Polyethylene (LLDPE) membrane. Cell 5 has a total capacity of 2.2 Mm³ of which 1.5 Mm³ is used for operational needs and the remainder to manage extreme events (i.e., environmental flood).

Water treatment plants (2) are in operation to allow for the reuse of as much water as possible in the concentrator processes as well as for discharge into the environment. Water pumped from Cell 5 is directed to polishing pond #1. It then passes through the Water Treatment Plant (WTP) where a chemical treatment with peroxide, silicate and lime allows for the residual degradation of WAD complexes and the precipitation of metals. Approximately 2.4 to 2.5 Mm³ of water are treated annually at the WTP. This water is then able to be returned to the concentrator or directed to the Final Water Treatment Plant (FWTP). The FWTP relies on microbial fauna naturally present in the water to treat thiocyanates and ammonia in order to render the effluent non-toxic prior to discharge into the environment. This microbial biotechnology plant is a reference in the industry as being the precursor for this type of approach for the treatment mining final effluents. Annually, approximately 1.8 to 2.2 Mm³ of water are treated.

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Figure 2 presents a simplified flow diagram of water and tailings movements and treatments at LaRonde while Figure 3 displays water movements superimposed on an aerial photo of the complex.

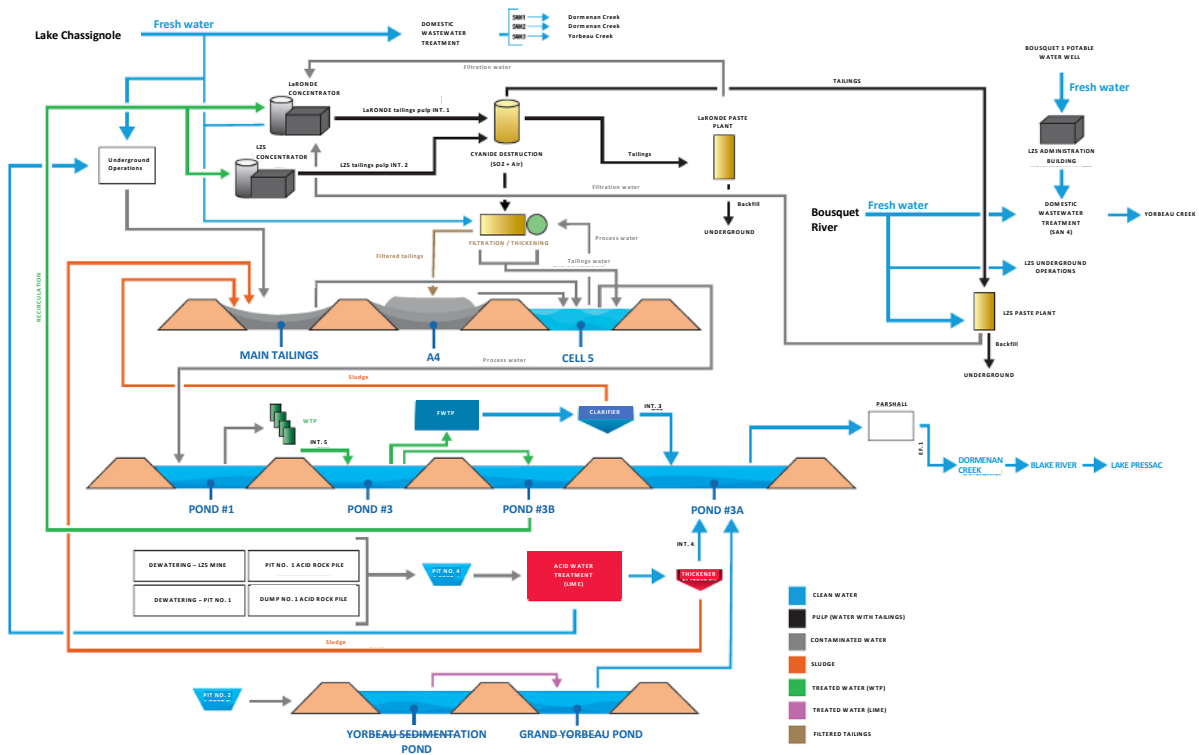


Figure 2: Water and tailings movements and treatments

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Figure 3: Water movements

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AUDITORS' FINDINGS

This operation is

- in full compliance with
 - in substantial compliance
 - not in compliance with
- with the International Cyanide Management Code.

Audit Company: EEM EHS Management
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Names and Signatures of Other Auditors:

Linda Byron - Technical expert auditor
lbyron@blueheronenv.com

Date(s) of Audit: February 20th to 24th, 2023

I attest that I meet the criteria for knowledge, experience, and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, as established by the International Cyanide Management Institute (ICMI) and that all members of the audit team meet the applicable criteria established by the ICMI for Code Auditors.

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

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PRINCIPLE 1 – PRODUCTION AND PURCHASE

Encourage responsible cyanide manufacturing by purchasing from manufacturers that operate in a safe and environmentally protective manner.

Standard of Practice 1.1

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

The operation is

- in full compliance with**
 - in substantial compliance
 - not in compliance with
- with Standard of Practice 1.1**

Basis for the finding:

- LaRonde exclusively purchases its sodium cyanide from Draslovka Mining Solutions (Draslovka) under a Supply contract which includes a requirement that the supplier comply with the requirements of the Code, maintain Code certification, and use Code certified distributors and transporters.
- Draslovka’s North American Production & Packaging were recertified as fully compliant in May 2023.
- Draslovka’s Memphis Intermodal cartage operations and their US/Canada Rail & Barge Supply Chain were recertified as fully compliant in April 2022.
- Draslovka’s Canada supply chain, including the Groupe Robert trucking company and its interim storage facilities in Canada, were recertified as fully compliant in May 2023.
- Draslovka’s Canada Bulk Transloading Facility in Malartic was recertified as fully compliant in May 2023.
- LaRonde does not use any independent cyanide distributors.


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

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- in full compliance with**
 - in substantial compliance
 - not in compliance with
- with Standard of Practice 2.1**

Basis for the finding:

- Supply chain and transporters used are all ICMI certified.
- AEM's contract with Draslovka includes a requirement that the supplier comply with the requirements of the Code, maintain Code certification, and use Code certified distributors and transporters.
- Bills of lading reviewed (27 reviewed: October 2021 to January 2023). All indicate that transport was realized by Groupe Robert, which is included in Draslovka’s Canada supply chain certification.

PRINCIPLE 3 – HANDLING AND 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
 - not in compliance with
- with Standard of Practice 3.1**

Basis for the finding:

- Cyanide is received and mixed in an ISO tank, and unloaded at the unloading area that has been constructed on a concrete pad with sump directed to the cyanide detox facility. The offloading area was designed with and approved by the cyanide supplier. As built drawings are available. Procedures have been implemented for the cleanup and recovery of cyanide that might spill on the concrete offload pad.
- The cyanide mixing and offload is located away from any surface water, and the sloping of the pad and associated sump is such that any cyanide spills would be collected and not reach the natural environment. The delivery area is within the secured area of the site (i.e., within a fenced in area) and procedures are in place to prevent unauthorized access during delivery/offload. Hydrogen cyanide (HCN) meters (2) equipped with audible alarms are installed in the offloading area.
- The reagent grade cyanide storage tank is equipped with level detectors (2). High-level audio/visual alarms report to the control room as well as to operator cellphones. The

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mixing and offload procedure requires that the tank level be checked prior to offloading and the connecting point not be unlocked until the operator ensures that there is sufficient capacity to receive the offload. Preventative maintenance programs are in place for the level detectors which are maintained as per the manufacturer's recommendations.

- The cyanide mixing and storage tanks are constructed of mild steel (tank walls and bottom) and are located within the [roofed] mill building and on an impermeable concrete surface with concrete secondary containment walls in place. There are no buried cyanide pipelines. Each tank is equipped with ventilation equipment to minimize the build-up of cyanide gas. HCN gas detectors are located and maintained in the vicinity of all cyanide storage tanks. HCN detectors are included in the facility's maintenance program.
- The mill is not accessible to the public and is controlled within a fenced in area. Security surveillance is in place (via cameras and inspections).
- Bulk hydrochloric acid (HCL) is present in the mill however the bulk cyanide is stored separately and at a significant distance across the mill from the hydrochloric acid. Tanks containing cyanide are all surrounded by secondary containment that would prevent interaction with HCL.
- Smoking and eating are not permitted in the mill, and there are no explosives, foods, or animal feeds in the mill.

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

Basis for the finding:

- The site receives cyanide from Draslovka in an ISO tank truck that contains pre-dyed briquettes. The truck connects to the offloading system via two hoses that feed heated water to the tanker truck to mix the briquettes into solution. No other small containers of cyanide are received. Empty ISO tanks used to deliver bulk cyanide do not remain on site after unloading. They are returned to the supplier by the transporter. The facility does not handle empty cyanide containers.
- Cyanide piping and valves are inspected on a weekly basis by mill operators and are inspected by qualified engineers every 3 years.
- The facility's offloading procedure requires that an operator be present at the beginning and the end of the offload. The offloading operation is also observed remotely by video. The procedure contains photos which clearly show how offload is to be conducted and also

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addresses personal protective equipment requirements, barricading of the offload area, verification of receiving tank levels and alarm, testing of the emergency shower, and manipulation of hoses, couplings, and valves. The procedure also refers to the facility’s cyanide spill procedure which outlines the process for timely and safe clean-up of cyanide spills.

- Following completion of unloading activities, cyanide delivery personnel are responsible for cleaning any cyanide residues remaining on the pad or on discharge piping connexions using process water which is available at the unloading location. Residues are directed to a sump and returned to the mill process. Handling of hoses and connections are addressed in the cyanide unloading procedures.
- Major spills would be addressed according to the facility’s cyanide spill procedure.
- Cyanide supplier truck drivers must go through general orientation that includes what to do in the event of an alarm at the offloading area.

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

Basis for the finding:

- The facility has developed documented and controlled plans and procedures for all aspects of cyanide management. Note that the facility does not operate any leach pads or process ponds.
- The history of the tailings impoundments and ponds is detailed in the facility's *Operations, maintenance, and surveillance manual (Vol. 1)*. Factors related to site conditions that can influence the performance and risk profile of the tailings facility throughout its life cycle, including climate change, local regulatory requirements, and accepted good practices have been taken into consideration in design and operation.
- Conception and design criteria and as built plans are available for cyanide handling infrastructure.

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- Discharges of cyanide to surface and groundwaters are regulated by federal and provincial authorities.
- Plans and programs for documented inspections and preventative maintenance have been established for cyanide containing and transport systems, HCN detection systems, emergency response equipment, the tailings storage facility, and water retention structures.
- A change management process is in place for all cyanide related equipment at the facility. Proposed changes must be analyzed and signed-off on by a qualified engineer who takes into consideration regulatory and other environment, health, and safety requirements prior to implementation of the change. New projects are systematically run through the management of change procedure and engineering reviews the projects for risks. For modifications to programming, a written authorization from a General Foreman must be issued prior to executing the request.
- All cyanide equipment has been flagged in the equipment maintenance management system. For all work orders associated with CN equipment, a *High-Risk Work Permit* requirement is automatically generated. Work orders are systematically reviewed by the maintenance planning team prior to executing any work. Any proposed changes to CN equipment are transferred to an engineering team for analysis. For modifications to programming, a written authorization from a General Foreman must be issued prior to executing the request.
- Cyanide management contingency procedures are in place for non-standard operating situations that may present a potential for cyanide exposures and releases including the tailings storage facility and pond capacity and integrity (managed via automated and manual monitoring and management instructions provided by the water management and tailings management teams, and a robust inspection program), water quality (via regulatory and internal water quality monitoring), and closure plan requirements for temporary closure or cessation of operations.
- Temporary closure or cessation of operations for both short (i.e. <6 months) and long-term (i.e. >6 months) are addressed in the facility's closure plan. In summary, the contents of all cyanide tanks would be directed to the mill circuit, the cyanide tanks, process tanks and all associated piping would be flushed with process water. Flushing waters would be treated in the detoxification plant. The tailings filtration system would be emptied to the tailing impoundment. All cyanide containing equipment would then be decontaminated based on LaRonde's decommissioning procedure which specifies how decontamination is to be conducted based on the potential cyanide concentrations that may be present. Weekly inspections of mill interior cyanide piping is maintained during temporary shutdowns. During a long-term shutdown, if no cyanide containing solutions or residues are produced, and all tanks and pipes have been emptied, monitoring of indoor and outdoor piping is suspended. Piping condition would be verified prior to start-up. Tailings and water impoundments would continue to be monitored regardless of closure status. Control and monitoring of effluents must be maintained regardless of closure status (this is a government requirement).
- Inspections have been conducted and inspection programs, including non-destructive testing, are in place at a determined frequency for cyanide tanks, piping, valves, secondary containment, and the cyanide destruction unit. Exterior tailings pipelines are either double-

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walled, contained in a ditch, or are monitored using a real-time fiber-optic monitoring system. The tailings storage facility, ponds and pipelines are subject to regular, internal, and external inspections. Operation and inspection are based on design criteria. Internal and external inspections are documented. Inspection deficiencies are noted in a Corrective Action Tracking file and corrected via work orders.

- Power outages are managed with back-up power generators. Back-up pumps are also available. The required power load to operate pumps and other critical equipment necessary to prevent unintentional releases and exposures corresponds to approximately 55% of the facility’s total generator capacity. Back-up pumps are also available on-site. In addition, extra pump capacity is systematically brought on site during the freshet period as a preventive measure. Maintenance programs are in place in the JD Edwards equipment maintenance management system, including generator tests, to ensure that generators and back-up pumps are functional when needed.
- It is of the verifier’s opinion that operation inspects cyanide facilities on an established frequency that is sufficient to ensure and document that they are functioning within design parameters.

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

Basis for the finding:

- Weekly laboratory control tests on mill ore feed are used to establish CN addition target rates with the goal of using the least cyanide possible.
- Automated processes are in place to control cyanide addition levels. These are verified against manual operator verifications.
- Periodic testing is conducted on geology samples that allow for insight into what is coming in the next 3 to 5 years. This is used principally to determine if there will be impurities in the feed that risk significantly increasing CN consumption.

Standard of Practice 4.3

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

The operation is

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- in full compliance with**
 - in substantial compliance
 - not in compliance with
- with Standard of Practice 4.3**

Basis for the finding:

- The facility has developed a comprehensive, probabilistic water balance model. Maximum operation levels were established for each pond (spring and non-spring) to maintain capacity for extreme events (i.e., environmental design flood events). Operating levels are based on Canadian Dam Association and provincial criteria and took into consideration climate change impacts. Seepage is recirculated into the ponds and is considered a closed loop.
- The water balance considers volumes of tailings, water transfers (IN/OUT), estimated and actual local precipitation values, impacts of freezing and thawing including water inputs based on snowpack samples, precipitation, evaporation, pore water retention, and water treatment capacity. All ponds are impermeable. The water table is below the tailings area, as such, there is no impact. Seepage from dikes is captured and pumped back into the ponds. No upgradient runoff enters the ponds as the facility is situated at the top of the local watershed. Groundwater surrounding the tailings facilities is monitored.
- Flowmeters are installed on all pumps that transfer waters between ponds. During winter, precipitation is accumulated as snowfall and released during spring - typically in March and April. Snowpack measurements are conducted in order to predict the probable water influx.
- The principle variable in the water balance is weather condition. In order to minimise impacts resulting from potential variability, the facility uses government weather data, including evaporation and absorption data, in the water balance model. Weather data is generated at the Rouyn airport, approximately 32 km due east of the LaRonde mine. The facility uses the moving monthly average for the previous 10 years for predicted precipitation and calculates the 20th and 80th percentile for the same period on a monthly basis. This data provides the facility with an operating range that allows for management below established maximum pond levels in order to be able to accommodate heavy precipitation and or freshet events.
- Cyanide destruction takes place upstream of the tailings area and there is capacity to accumulate water and conduct additional polishing should a treatment disruption occur (this is a regulatory requirement).
- Maximum operation levels have been established for each pond (spring and non-spring) to maintain capacity for extreme events (i.e., environmental design flood events). Operating levels are based on Canadian Dam Association and provincial criteria and took into consideration climate change impacts. Minimum freeboard is set at 1.5m below the weir sill as required by provincial legislation. 2000-year return precipitation event, 24-hour duration + 100-year return snow events are applied.
- Operating instructions have been established for the tailings storage facility and ponds by the water management and tailings management teams. Continuous automatic water level monitoring probes are installed in each impoundment and report to a software system. Operational levels, target levels (variable as required and within design limits), maximum

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levels, emergency levels, and spillway levels are programmed into the system. Manual measurements are taken during each shift to corroborate system readings.

- Piezometers are installed in dikes and set-off an alarm if a sudden water level change occurs. Dike seepage pumping is continually monitored.
- The tailings storage facility and ponds are inspected twice per day by operators, quarterly by the tailings management technician and geotechnical engineer, and annually by the Engineer of Record and an external consultant (WSP-Golder). Issues are recorded and tracked in an Excel file under the responsibility of the geotechnical engineer.
- Cyanide is destroyed using hydrogen peroxide followed by the addition of Cu(II) ions. The effluent copper concentration is used to ensure destruction of CN.
- Environment Canada data from the Rouyn-Noranda airport, located 32 km to the west of the facility, is used to update the water balance both for precipitation and evaporation. In anticipation of climate change, extreme weather conditions have been calculated and are considered in the operation and design of structures.
- A water balance report for all water retention structures is prepared by the water treatment department and updated monthly to:
 - monitor the status of the volumes of water stored in the TSFs and ponds;
 - verify that water management objectives have been achieved;
 - verify that the water treatment plants are performing as expected; and,
 - assess different scenarios as a function of weather conditions in order to implement action plans if necessary.

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**
 - in substantial compliance
 - not in compliance with
- with Standard of Practice 4.4**

Basis for the finding:

- Cyanide destruction takes place prior to deposition of tailings. Note that the facility replaced pulp tailings with dry-stacked tailings in fall of 2022. Poned waters are consistently well below 50 ppm WAD CN.
- Daily tailings and pond inspections are conducted and include observations for presence of wildlife and any wildlife mortality. There are also wildlife observation logs posted at various locations through the site and hunting cameras are installed at various locations on the site for on-going observation.
- No wildlife mortalities have been reported since at least 2014.

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

Basis for the finding:

- The facility has one final effluent that directly discharges to surface water, and no direct discharge that is > 0.5 mg/L WAD CN.
- Downstream monitoring is conducted in the mixing zone (referred to as the exposure zone) Total cyanide (CNT) concentrations are always below 0.022 mg/L downstream of the discharge, and below 0.004 mg/L on average in the exposure zone (Max 0.01 mg/L detected in 2022).
- There are no indirect discharges to the environment. All seepages are collected and pumped back into the system. The seepage collection ponds are clay lined. Indirect discharges from the operation have not caused cyanide concentrations in surface water to rise above levels protective of a designated beneficial use for aquatic life.


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

The operation is

- in full compliance with**
- in substantial compliance **with Standard of Practice 4.6**
- not in compliance with

Basis for the finding:

- Dyke cores, and the TSF and pond foundations are composed of low permeability materials (i.e., till, clay, clayey silt) or are covered with an impermeable geomembrane. Collection sumps are located around the TSF and automatically return seepage to basins.
- The nearest private water wells are approximately 1.6km to the north of the facility. These are not considered by government authorities who only consider wells that are at a distance of 1km or less. In addition, groundwaters are not used for any purpose by the facility.

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- An extensive network of observation wells (150) has been installed upstream and downstream of the site, in the direction of groundwater flows. The wells are sampled in May and August, during high and low water periods. The Quebec Policy for the Protection and Rehabilitation of Soils and Contaminated Sites and the Intervention guide – Soil protection and rehabilitation of contaminated sites sets the limit for free CN at 0.022mg/l. The facility has established an alert level at 0.011 mg/l CNT. WAD CN is also analyzed, although no provincial limits for this parameter are in place. Overruns sometimes occur; however, corrective measures are implemented.
- Regulations are in place in Quebec for the presence of cyanide in tailings that are used for underground backfill. When ore tailings are used for backfilling underground excavations, the water contained in these tailings and flowing from them must not have a cyanide content higher than 0.005%, expressed as potassium cyanide. The government body to which the province of Quebec has entrusted the administration of the Act Respecting Occupational Health and Safety concluded that a study on the impact on workers was not required because CN concentrations analyzed in mine waters are very low.
- All tailings are detoxified to <50 ppm WAD CN. Tailings used in back-fill are further reduced to < 20 ppm WAD CN following dehydration and mixing with cement, slag residues and fresh water.
- WAD CN is measured every 4 hours on the backfill. Target: 10 to 15 ppm WAD CN. Results are compiled in paste plant operator reports. Target limits are also set in Wonderware. Actions are taken if exceedances are noted.
- Sampling conducted on mine waters between January 1, 2020, and May 25, 2020, consistently demonstrated concentrations below 0.025 mg/L WAD CN. A total of 16 samples were collected over the 5-month sampling period.

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
 - not in compliance with
- with Standard of Practice 4.7**

Basis for the finding:

- Process tanks, pipeline, and other cyanide system pipelines (tailings) are constructed of compatible materials.
- All tanks containing cyanide concentrations of ≥ 0.5 mg/l WAD CN are constructed of steel with concrete secondary containment. Tanks and secondary containment structures are externally verified every 3 years by an external engineering consultant. None of the facility’s tanks or vessels are installed on ring beam foundations.
- Mill sumps are designed to contain and collect spills from the cyanide unloading, storage, mixing, and process solution tanks and are directed to process or the cyanide destruction plant. Procedures are in place to respond to internal and external cyanide spills including a soil sampling and remediation procedure that describes soil sampling requirements after

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any spill. The procedure refers to provincial criteria for remediation targets, and specifically outlines WAD CN and CNT targets for soil remediation.

- Sufficient secondary containment or prevention measures are in place for pipelines and tanks to ensure there is no risk to the environment or safety in the event of a spill. All the pipelines are aboveground and mapped. Surface waters are not at risk from cyanide pipelines.
- The organization has assessed the risk to surface water and determined that there is no risk of a cyanide spill to surface water, based on the layout of the property and implemented protective measures. For example, double walled piping, collection ditches and ponds, detection systems.
- For tailings line(s) that run from the detoxification plant to the ponds and between the ponds, given that cyanide is destroyed in the tailings prior to being sent to the filter press, the water is always less than 50 mg/L WAD CN.
- The send/return lines that run from the concentrator to the LZ5 paste backfill plant are covered with granular material for protection and stability purposes. These lines have total cyanide concentrations >0.5ppm and, as such, an early leak detection system has been installed between the send and return pipes (OptaSense fibre optic detection system with a typical leak detection precision of 0.9 m3/hr and location within 10m). Another pipeline runs between the LaRonde concentrator and the tailings filtration plant. Protections are in place for this line where there is potential for impacts to the natural environment including double-walled piping or installation in ditches.

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

Basis for the finding:

- Original QA/QC records are not available, as such, the facility hired external engineering consultants to inspect all cyanide equipment and corrective actions were implemented. External engineering consultant have reviewed and approved cyanide tanks, installations, and pipelines, and have provided documentation that the facility has been built as proposed and approved. A management of change process in place to control any modifications to cyanide facilities.
- WSP/Golder has been the design engineer for the tailings and are responsible for the design and QA/QC programs for construction since 1990 (with the exception of the original 1988 construction). QA/QC and construction records are available for the construction of the tailings facilities and associated ponds. Where records are historical and not available

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(i.e., 1988 construction of the tailings dam and original mill designs), qualified professionals were engaged to prepare QA/QC reports and these records have been retained.

- WSP/Golder conducts pond and tailings inspection as per the facility’s established schedule.
- An external engineering consultant has reviewed and approved cyanide tanks, installations, pipelines, and secondary containment. All cyanide containing systems, from reception to distribution are inspected by an external engineering consultant every 3 years. Agitator systems are verified annually. The cyanide detoxification plant is inspected annually. Cleaning and tank cover thickness is conducted at 6-month intervals.
- The facility engaged an external engineering consultant to develop a procedure for the repair of cyanide tanks and pipelines to ensure that the correct materials are used moving forward.

Standard of Practice 4.9

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

The operation is

- in full compliance with**
 - in substantial compliance
 - not in compliance with
- with Standard of Practice 4.9**

Basis for the finding:

- The facility has developed procedures for monitoring and utilizes a sampling and reporting schedule to guide monitoring plans. Sampling procedures specify how and where samples should be taken, sample preservation techniques, chain of custody procedures, shipping instructions, cyanide species to be analyzed, and quality assurance and quality control requirements. Sampling conditions including weather and wildlife presence are recorded in an electronic Intalex form. The monitoring program was developed by qualified personnel. Chain of custody is ensured through individual sample numbers attributed by the LaRonde environment team. The numbers are used by the external laboratory and on certificates of analysis and invoices.
- Monitoring of surface and groundwater is conducted in accordance with permit requirements as well as for internal monitoring purposes. Monitoring frequencies are considered adequate to characterize the medium being monitored and to identify changes in a timely fashion.

PRINCIPLE 5 – DECOMMISSIONING

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

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

Basis for the finding:

- A procedure for the decommissioning of cyanide facilities has been developed and is included in the facility’s closure plan. The procedure includes a schedule for decommissioning activities and detailed list of all equipment that contains or could potentially contain cyanide has been identified and a 3rd party cost estimate has been produced and included in the decommissioning cost estimate.
- Closure plans are reviewed periodically as per regulatory requirement including when material changes occur to the facilities or operations. Plans are updated at least every 5 years as per provincial mine closure requirements. The decommissioning of cyanide contaminating equipment procedure also requires regular review not to exceed 5 years.

Standard of Practice 5.2

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

The operation is

- in full compliance with**
 - in substantial compliance
 - not in compliance with
- with Standard of Practice 5.2**

Basis for the finding:

- LaRonde’s closure plans include cost estimates for decommissioning including removal and decontamination of cyanide-related equipment and infrastructure. Costs are based on third party estimates as required by provincial mining requirements and internal Agnico Eagle Mines closure costing requirements.
- Closure costs plans are reviewed periodically as per regulatory requirement including when material changes occur to the facilities or operations. Costs are updated at least every 5 years as per provincial mine closure requirements. The decommissioning of cyanide contaminated equipment procedure also requires regular review not to exceed 5 years. In addition, quarterly closure cost updates are provided internally to Agnico Eagle Mines’ corporate function.

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- The provincial government requires a guarantee covering 100% of the anticipated reclamation costs to be held by the government (financial assurance). The reclamation cost estimate for the guarantee must be based on fully funded third-party implementation. LaRonde has deposited a guarantee with ScotiaBank in the amount of \$169.3M. Restoration costs include cyanide related decommissioning activities.

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**
 - in substantial compliance
 - not in compliance with
- with Standard of Practice 6.1**

Basis for the finding:

- Procedures and / or high-risk work permit process in place for tasks related to unloading, mixing, plant operations, entry into confined spaces, and equipment decontamination prior to maintenance. Procedures refer to required PPE. High risk permits require additional PPE, controls, and monitoring, including a watchperson.
- A pre-work inspection program, known as the Supervision Formulae work card, is also in place. The program is applied to all non-administrative work that is conducted by LaRonde employees or contractors. The work card is completed by supervisors and their workers at the beginning of each work shift to determine the work to be done, identify dangers and risks, verify the status of the workplace, and to discuss work planning. At a minimum, supervisors must revisit workers at least once per day. Two visits are obligatory for high-risk work. Performance of the program is tracked and audited (quarterly).
- The facility also conducts Job Safety Analyses (JSA) for non-routine work. These are typically conducted for work involving cyanide. JSAs are completed by teams which include supervisors, workers and, if required, health and safety department personnel.
- Worker feedback is solicited and actively considered in various ways at the facility. For example, during monthly health and safety meetings, through the facility's Joint Health and Safety Committee, through participation in JSAs, and through validation of procedures by workers prior to them being issued for final approval.

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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
 - not in compliance with
- with Standard of Practice 6.2**

Basis for the finding:

- pH during mixing and production activities is continuously monitored and controlled with automatic lime addition to maintain a minimum pH of 10. The operation targets the noted minimum pH level in order to limit the evolution of hydrogen cyanide gas during mixing and production activities. Manual pH verifications are conducted to validate that the system is operating correctly. An alarm is triggered should pH drop below 10. Cyanide dust is not present at the facility.
- Fixed gas detectors are installed at strategic locations in the mills, the paste backfill plant, the tailings dry-stack thickener, and at the cyanide regeneration project plant which operates on the sulphidization acidification recovery technique. 4.7 ppm of HCN gas triggers a pre-alarm that requires investigation and correction. 10 ppm of HCN gas triggers evacuation. HCN gas detectors are installed in sectors where dilute acid tank sumps discharge and are linked to automated lime addition systems.
- Preventative maintenance for fixed HCN gas monitoring equipment is programmed into the JD Edwards equipment maintenance management system. Maintenance, calibration, and testing is conducted at 45-day intervals rather than the manufacturer’s recommended frequency of every 4 months. Record retention exceeds three years. The Health and Safety department is responsible for maintaining portable HCN gas detectors, calibrating detectors every 30 days, performing weekly bump tests, and ensuring the availability of calibration gases. The calibration frequency of the portable gas detectors is in-line with the monthly frequency recommended by the manufacturer. A list of gas detectors is maintained current. Supervisors are trained in the use and calibration of portable detectors.
- Signage warning of the presence of cyanide is in place at all entrances to the concentrator and at the cyanide unloading area. Information regarding the prohibition of smoking, open flames and eating and drinking in areas where cyanide may be present is posted and is conveyed to workers as part of awareness training.
- Cyanide arrives at the facility dyed red.
- Showers are equipped with low-pressure eye-wash stations and have been located, where cyanide is present, based on the *NSI/ISEA Z358.1 Emergency Eyewash and Shower Equipment* standard. Activation of showers and eyewash stations relay an alarm to the mill control room, and mill operator and supervisor cell phones. Additional portable eyewash stations are also available. These are sealed and have an expiration date displayed.

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Showers and fixed and portable eyewash stations are inspected monthly, and temperature is verified/adjusted semi-annually.

- ABC type fire extinguishers are available in areas where cyanide is present. Extinguishers each have a unique identifier number. Monthly, documented fire extinguisher inspections are conducted by facility personnel. Annual inspections and maintenance of fire extinguisher are conducted by an external party.
- Signage warning of the presence of cyanide in place at all entrances to the concentrator, at the cyanide unloading area, on all cyanide tanks, process tanks containing cyanide, and piping at the mill, and at the tailings area and ponds.
- All cyanide piping and concentrated solution tanks are painted orange. Flow direction is indicated on piping. Tanks with reagent grade cyanide or pulp with cyanide are also identified with signage. The cyanide color coding scheme is communicated during the facility's general induction training and in a cyanide specific training video that is presented to all persons who access areas where cyanide is present.
- Signage has not been placed along exterior tailings pipelines as cyanide concentration are below 50 ppm WAD CN.
- All documented cyanide safety information is written in the local language (French). Safety data sheets are maintained in the Paratox hazardous materials management software system. The Paratox application is pushed to the operation consoles and onto cell phones that operate on LaRonde's private cellular network. AEM personnel are trained on the Global Harmonized System (GHS) / Workplace Hazardous Materials Information System (WHIMIS) at hire during general induction training. Training is refreshed every 5 years. Contractors must be trained on the GHS/ WHIMIS upon arrival on site (contractual requirement).
- First aid procedures are available on the Intalex environment, health and safety software platform and are accessible via computer consoles throughout the plant. General first-aid points are also provided on information sheets that are posted in high-risk locations.
- An accident reporting, investigation and analysis program is in place and is used to address accidents, incidents, and near-miss events. Cyanide events are systematically investigated. Accidents, incidents, and near-miss events are reviewed during daily meetings in which management, general supervisors, and environment, health and safety, and human resources department personnel participate. No cyanide exposure events have occurred at the facility.

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**
 - in substantial compliance
 - not in compliance with
- with Standard of Practice 6.3**

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Basis for the finding:

- Oxygen, a resuscitator, and antidote kits are available at the guardhouses and the infirmary. Antidote kits are stored in refrigerators and in plastic bags to prevent exposure to condensation. Expiration dates are indicated on the kits. First aid kits are also available at various locations at the facility and in vehicles. A documented inspection of emergency response equipment is conducted quarterly by the emergency response advisor.
- Cyanide antidote kits consist of injectable hydroxocobalamin, also known as vitamin B₁₂. Administration of antidotes must be conducted by a physician.
- Radios and mobile phones (private network) are widely available and in common use at the facility. Alarm switches are present at strategic cyanide locations at the plant. Emergency showers, eyewash stations, and fixed HCN gas detectors are connected to the alarm system.
- LaRonde has in place a documented procedure to respond to various cyanide exposures scenarios including dermal, ocular, inhalation, ingestion, and altered state of consciousness. The procedure was reviewed by an emergency medical technician.
- LaRonde’s roster of trained workplace first aiders largely surpasses the minimum number required to be present on-site at any given time as required by local regulatory requirements. The facility also has a large team of trained first responders (40 hr basic training + 16 hrs annually) who are trained in the [on-site] transportation of an injured person. In addition, two nurses are available on site from Monday to Thursday (6am to 4pm). Both are licensed members of the Order of Nurses of Quebec and have access to an on-site, fully equipped infirmary. A 4-hour cyanide specific first aid training is provided for all personnel who could potentially be exposed to cyanide or who may respond be involved in a cyanide incident.
- Ambulance service is available in the town of Cadillac, approximately 7km from the mine site, and in Rouyn, approximately 50km from the mine site. Victims would be transported to the hospital in Rouyn-Noranda.
- The communication of the potential need to treat patients for cyanide exposure was conducted in March 2022 with the regional government organization responsible for hospital services. A process is in place to ensure that the local hospital is annually reminded of the need to treat potential cases of cyanide exposure. LaRonde is confident that the Rouyn-Noranda hospital can respond to cases of cyanide exposure as the region's principle industry is mining with several gold mines using cyanide.

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.*

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The operation is

- in full compliance with**
 - in substantial compliance
 - not in compliance with
- with Standard of Practice 7.1**

Basis for the finding:

- The facility has comprehensive written emergency response plans and related procedures to deal with all potential scenarios required by the Code. The cyanide supplier, Daslovka, is responsible for the transport and delivery of cyanide to the facility, including responding to spills during transport and offload. The contract with Daslovka specifies this requirement.
- The facility’s plans address the potential need for evacuations of both the site and potentially affected communities, and address the use of specialized first aid equipment, antidotes, and measures to control cyanide releases.
- Risk assessment processes, as well as accident/incident investigation plans, are meant to assess the root causes of incidents to prevent future events.


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

The operation is

- in full compliance with**
 - in substantial compliance
 - not in compliance with
- with Standard of Practice 7.2**

Basis for the finding:

- The facility has identified external entities that have emergency response roles and regularly and actively seeks input regarding emergency response planning from both external emergency responders and members of local communities. External emergency responder comments and contributions have been included in emergency response planning. In addition, external emergency responders are periodically involved in simulation exercises involving cyanide. The workforce is consulted on an annual basis during the review of the Emergency Response Plan - at each review, there is a question posed re: *any suggestions or questions?*
- In October 2022 a community workshop was held specifically to discuss the emergency response plan (including cyanide risks), with 15 residents in attendance from the nearby communities of Cadillac and Preissac. Flyers regarding the emergency response plan, including cyanide risks, were distributed in hard copy at community meetings and are available on the Laronde website.

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Standard of Practice 7.3

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

The operation is

- in full compliance with**
 - in substantial compliance
 - not in compliance with
- with Standard of Practice 7.3**

Basis for the finding:

- Primary and alternate emergency response coordinators as well as emergency response team members are identified, and their roles and responsibilities described in the emergency response plan. Training for all emergency response personnel is described.
- Emergency callout procedures are in place - a 24-hour external callout service is used.
- A list of emergency response equipment is maintained and documented inspections of equipment are conducted quarterly.
- External responder roles are described in the emergency response plan. These have been made aware of their roles and are periodically involved in simulation exercises.

Standard of Practice 7.4

Develop procedures for internal and external emergency notification and reporting.

The operation is

- in full compliance with**
 - in substantial compliance
 - not in compliance with
- with Standard of Practice 7.4**

Basis for the finding:

- The emergency response plan includes procedures and contact information for management, regulatory agencies, external response providers, and medical facilities. Local community members are contacted via a texting service which messages community members that have provided their information. The plan also includes information regarding contacting agencies that may be of help to families and to inform the public. The media is notified based on the emergency level and the facility’s Crisis and Communications Management Plan requirements.
- The organization has established a procedure to ensure that the ICMI is notified of any significant cyanide incident. No incidents have occurred to date that required reporting to the ICMI.

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

Basis for the finding:

- The recovery and neutralization of cyanide solutions and solids, including decontamination of soils and other contaminated media, and the management and disposal of spill clean-up materials is included in the facility’s cyanide spills and soil sampling procedures. In summary, solid cyanide would be recovered in a hermetically sealed steel drum and disposed of as hazardous waste. Liquids containing cyanide would be treated with lime slurry and process water (both available at the mine site), pumped, and disposed of in the concentrator circuit.
- For soils, the decontamination method (i.e. excavation or in-situ treatment) would be based on the results of soil sampling (to be conducted in accordance with provincial guidelines). Excavated soils would be transported and disposed of at an authorized facility. If in-situ treatment is retained, it would be conducted in accordance with provincial guidelines. Decontamination criteria would be based on provincial soil protection and rehabilitation criteria. Contaminated equipment would be decontaminated in accordance with LaRonde’s procedure for decommissioning of cyanide contaminated equipment. The goal of decontamination is to bring CN levels to <0.5 ppm in the rinse waters.
- There is no risk to drinking water supply from cyanide spills or releases at this site as the nearest drinking water well is greater than 1km away. Potable water consumed at the facility is supplied bottled water.
- The facility’s cyanide spills procedure prohibits the use of chemical products such as sodium hypochlorite and hydrogen peroxide to treat cyanide released to surface water or that has the potential to reach surface water.
- The organization has assessed the risk to surface water and determined that there is no risk of a cyanide spill to surface water based on the layout of the property. Any pipe leaks would be limited to the concentrator facility or, in the case of tailings lines which are all aboveground, would drain towards the tailings area or ponds. As such, LaRonde has not established a procedure for monitoring surface water as a response to cyanide spills. All tailings lines are above-ground.
- The send/return lines that run from the concentrator to the LZ5 paste backfill plant are covered with granular material for protection and stability purposes. These lines have total cyanide concentrations > 0.5ppm and, as such, an early leak detection system has been installed between the send and return pipes (OptaSense fibre optic detection system with a typical leak detection precision of 0.9 m3/hr and location within 10m). Another pipeline runs between the LaRonde concentrator and the tailings filtration plant. Protections are in

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place for this line where there is potential for impacts to the natural environment including double-walled piping or installation in ditches.

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

The operation is

- in full compliance with**
- in substantial compliance **with Standard of Practice 7.6**
- not in compliance with

Basis for the finding:

- The Emergency Response Plan is reviewed as a minimum on an annual basis, and considers the results of mock drills, actual emergencies, and audit findings. Reviews are also conducted after significant incidents.
- Mock drills are conducted annually and periodically with external responders. Cyanide emergencies are listed as being required to be tested annually. The most recent mock drill of a cyanide emergency was completed in September 2022. Records of drill reports are retained. The September 2022 test of cyanide emergency response involved external emergency response personnel. The simulation exercise was a cyanide delivery truck hose connexion failure on LaRonde’s CN delivery pad. A post-mortem was conducted and corrective actions were developed to address observed weaknesses which included communications, absence of windsocks, muster points, and access road blockage issues.
- No actual cyanide emergencies have been experienced by the facility.

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**
- in substantial compliance **with Standard of Practice 8.1**
- not in compliance with

Basis for the finding:

- Personnel who can potentially encounter cyanide have been identified and are principally those persons who work or circulate unaccompanied in the concentrator as well as

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laboratory personnel. A cyanide specific video has been developed and is required viewing by all personnel who can potentially encounter cyanide. The video must be re-viewed annually. Mill personnel also receive a training on chemical reagents that are used in the concentrator process, including cyanide. All positions requiring initial cyanide training and re-fresher training are identified in the facility's Intelex training module.

- The cyanide specific video training video covers the following topics: what is cyanide and what is it used for, how to identify for the presence of cyanide, cyanide hazards and how to recognize CN intoxication, what to do in the case of CN exposure, decontamination, basic first aid for CN, and clean-up of CN spills.
- Cyanide training records are retained and easily traceable.

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

Basis for the finding:

- Mill operator and maintenance training is principally conducted through accompaniment using trained and experienced personnel. Theoretical training is provided by experienced and qualified trainers. Training logs are completed as trainee skills are developed and are signed-off by the supervisor once training is complete. In addition, a daily training report is produced during the training period and is communicated to the training department to monitor progress. The human resources department annually reviews and validates training requirements for the concentrator operations and the concentrator training department. Training videos are readily available to mill personnel in a 3-D model of the mill on concentrator computer consoles. PowerPoint presentations have been developed and are maintained for all tasks involving cyanide management.
- Training must be completed before workers can perform any cyanide-related tasks. Records are available and easily accessible to concentrator supervisors to determine if a worker is ready to conduct a task/job.
- Truck drivers who deliver cyanide to site must receive the facility's general health and safety induction training.
- A cyanide specific video has been developed and is required viewing by all personnel who can potentially encounter cyanide. The video must be re-viewed annually. Cyanide unloading training is refreshed every 2 years. Refresher training needs are tracked by the training advisor on the Intelex system. In addition, facility procedures, including those related to cyanide, are regularly reviewed during team and monthly health and safety meetings.

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- Theoretical training is evaluated by means of exams while training by accompaniment is evaluated by trainers in training logs which are signed-off by the supervisor upon completion. In addition, a daily training report is produced by the worker/trainer during the training period and is communicated to the training department to monitor progress. An annual follow-up is conducted by the mill training advisor for all mill workers and recorded. Job observations, based on the procedure associated with the task, are also conducted and serve to evaluate knowledge retention.
- Training records, documenting training received during an employee’s entire period of employment, are maintained. Records indicate: employee name, name of trainer, date(s) of training, training topics covered, and, employee evaluation.


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**
 - in substantial compliance
 - not in compliance with
- with Standard of Practice 8.3**

Basis for the finding:

- A cyanide specific video has been developed and is required viewing by all personnel who can potentially encounter cyanide. These include AEM mill and maintenance employees, contractors, security and janitorial personnel, and laboratory personnel. The video must be re-viewed annually. The training covers: cyanide hazards and how to recognize CN intoxication, what to do in the case of CN exposure, decontamination, basic first aid for CN, and clean-up of CN spills. In addition, a 4-hour cyanide specific first aid training is provided for mill supervisors, mill operators, mill maintenance, electrical, and instrumentation personnel, Centre de Service de Développement (CSD) personnel, mill maintenance planners, nurses, and laboratory staff.
- Emergency response coordinators and first responders are trained on LaRonde’s emergency response plans including response to various cyanide exposures scenarios and cyanide spill response. In addition, emergency response coordinators and first responders receive 40 hours of basic training + 16 hrs of training annually including one day devoted to cyanide response training. Training includes the use of emergency response equipment.
- Names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials are retained in the facility’s training records and documentation.
- LaRonde has made external responders aware of the elements of the emergency response plan related to cyanide via a live simulation exercise conducted in 2022. A virtual cyanide specific meeting was also conducted with external responders via Microsoft Teams in 2020.

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PRINCIPLE 9 – DIALOGUE AND 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**
- in substantial compliance **with Standard of Practice 9.1**
- not in compliance with

Basis for the finding:

- The facility engages with stakeholders by two principle means:
 - Citizen workshop meetings with citizens from the nearby municipalities of Preissac and Cadillac; and,
 - *A Harmonization Table* composed of local and regional stakeholder organizations who may be affected (or perceive to be affected) by LaRonde's operations.
- Both of these forums provide stakeholders with information on LaRonde’s cyanide management practices and allow for engagement regarding their concerns.


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

The operation is

- in full compliance with**
- in substantial compliance **with Standard of Practice 9.2**
- not in compliance with

Basis for the finding:

- A cyanide information leaflet has been produced by LaRonde, is regularly distributed to stakeholders during forums, and is available via LaRonde's website. The leaflet answers typical questions regarding cyanide such as: What is cyanide? What is it used for at LaRonde? How is it transported and delivered? What are the risks related to cyanide, and What is done by the facility to control risks? The leaflet also presents information about the Cyanide Code. Given that the local populations are predominantly literate, no additional particular efforts have been deployed to disseminated information on cyanide in verbal form.
- LaRonde publishes an annual report for cyanide management. The report provides information regarding incidents of cyanide exposure resulting in hospitalization or death

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and releases that occurred that required response, remediation, caused significant adverse health or environmental effects, or require reporting to authorities. The report also provides a link to LaRonde’s cyanide information leaflet. The report has been issued since 2020 and are available on-line on LaRonde’s website.

- The facility’s cyanide spill response procedure includes reporting requirements regarding the communication of significant events to the International Cyanide Management Institute, and the communication of cyanide events to the public.
- No reportable cyanide emergencies have been experienced by the facility.

AEM LaRonde Division

A handwritten signature in black ink, appearing to be 'R. B.', is written over a light blue horizontal line.

February 19th, 2024

Name of Facility

Signature of Lead Auditor

Date