



May 26th, 2021

Mr. Eric Schwamberger
Vice President
International Cyanide Management Institute
1400 I Street, NW, Suite 550
Washington DC 20005 (USA)

Re: Canadian Malartic Mine ICMC Initial Certification Audit (2020) - Corrective Action Plan

Mr. Schwamberger

Canadian Malartic Mine underwent their initial International Cyanide Management Code (“Code”) certification audit from October 27th to November 19th, 2020. The audit identified four (4) Standards of Practice as being “substantially compliant” with the Code.

The findings of substantial compliance are all in regard to a statement by an engineering firm, issued subsequent to the engineering firm conducting an audit of the facility within the last year. More specifically, the firm recommended further investigation of the joints between the foundation and walls at MCM’s cyanide facilities to confirm that they are sufficient to ensure containment in the event of an important release of cyanide containing solution inside of the facility. The details of the deficiency are provided in the Corrective Action Plan (CAP) in Table 1.

Arrangements have been made with the facility to be notified when the CAP has been implemented. MCM has also been notified that any change to the planned completion date must be communicated to the Institute no later than ten (10) days after the established completion date.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Szwec", is written over a light blue rectangular background.

Ross Szwec,
ICMI Lead auditor
EEM EHS Management Inc.

Encl. (1) Corrective action plan

Cc Martin Duclos, Director, Sustainable development and environment, MCM

Table 1: Canadian Malartic Mine – Initial Cyanide Code Certification Audit (2020) - Corrective Action Plan

Standard of practice	Summary of Requirement	Deficiency	Required Corrective Action	Evidence Required for Verification	Planned Completion Date
3.1.6	Locate cyanide mixing and storage tanks on a concrete or other surface that can prevent seepage to the subsurface.	BBA conducted an audit of the facilities in 2020 to confirm that the facilities were constructed in conformance with ICMI and accepted engineering practices. The report confirms that the structures are located on concrete but recommends further investigation to confirm that the joints between the concrete foundation and walls ensure containment.	Have the joints between the foundation and the walls at all cyanide unloading, storage and process tank locations inspected by a suitably qualified professional and, if applicable, ensure that any areas of concern are sealed / repaired.	Evidence that an inspection was conducted by a suitably qualified professional. Evidence that repairs, if any were determined to be required, were effectively conducted. A formal statement by a suitably qualified professional that the joints between the foundation and walls are sufficient to ensure containment.	Dec 31, 2021
3.1.7	Construct secondary containment for cyanide storage and mixing tanks of materials that provide a competent barrier to leakage.				
4.7.1	Provide spill prevention or containment measures for all cyanide unloading, storage, mixing and process solution tanks.				
4.8.5	Where there is no available quality control and quality assurance documentation or as-built certification for cyanide facility construction, have an appropriately qualified person inspect those elements of the facility involving cyanide and issue a report concluding that its continued operation within established parameters will protect against cyanide exposures and releases.				