



EEM
EHS MANAGEMENT

ICMC CERTIFICATION SUMMARY AUDIT REPORT

FOR

Canadian Malartic Mine
Malartic, Quebec

SUBMITTED TO:

International Cyanide Management Institute
1400 "I" Street NW, Suite 550
Washington, DC 20005

And

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MAY 2021

Ref #: BH-20-PJ-1760

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Date

SUMMARY AUDIT REPORT

Name of Mine: Canadian Malartic Mine

Name of Mine Owner: Yamana Gold Inc. and Agnico Eagle Mines

Name of Mine Operator: Canadian Malartic Mine

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1.0 LOCATION AND DESCRIPTION OF OPERATION

The Canadian Malartic Mine (CMM) is a large open-pit operation located to the south of the town of Malartic, 25 km west of Val d’Or in northwestern Quebec (Figure 1). The large open pit operation began commercial production in 2011. In June 2014, Agnico Eagle and Yamana Gold acquired Osisko and created the Canadian Malartic Partnership that owns and operates the mine. Agnico Eagle and Yamana each have an indirect 50% ownership interest in the Partnership. The facility operates 24 hours/day 7 days/week and employees approximately 2000 full time workers (employees and contractors)

A 135-metre-wide buffer zone (the “green wall”) has been developed along the northern limit of the open pit to mitigate the impacts of mining activities on the residents of Malartic. The ridge has been planted with shrubs, trees and grasses. The green wall is enhanced by the addition of a nearby park, a bike trail and sculptures.

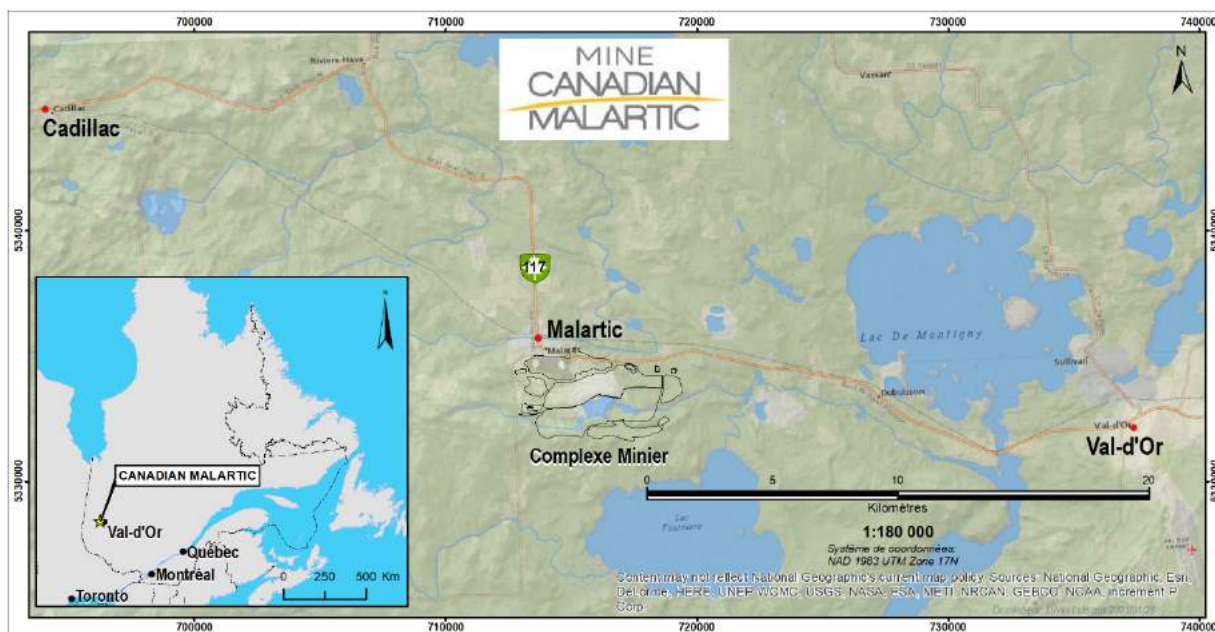


Figure 1 – Property Location (Regional map)

1.1 Process description

Ore is processed at the facility’s mineral processing complex, which currently has a 55,000-tonnes/day nominal throughput capacity. Ore is transported to a crushing circuit and the crushed ore is stockpiled in an ore storage dome. The ore is then conveyed to the semi-autogenous grinding circuit followed by three identical ball mills, each in closed circuit with hydro-cyclones. The slurry is thickened to about 50% solids before being fed to the leach tank circuit for conventional cyanidation followed by carbon-in-pulp processing technology. The product is doré bars containing gold and silver.

Cyanide injection points are present at the following locations:

- At the entrance to CMM’s three (3) ball mills;

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- The pre-leach thickener; and
- Positions 1 and 2 of each series of leach tanks (CMM has 4 series of 5 tanks).

Currently, 60% of the cyanide is added to the pre-leach thickener and 40% to the four (4) head tanks of the leach system. No cyanide is currently added to the grinding circuit.

Cyanide flow meters are present at the outlet of each cyanide injection pump. Consumption is calculated in real-time based on wet tonnes fed into the semi-autogenous grinding mill. The cascade control loop for injecting total cyanide into the circuit is initially based on ratios of incoming ore and makeup water. These ratios are 0.16kg / mt of ore and 0.03kg / mt of makeup water.

The control loop ratios are adjustable via a 0-200% correction factor modifiable by the operators. To deal with any sudden variation in ore and adjust the correction factor, operators perform titrations in leach tank in positions 1, 3 and 5 approximately every 4 to 6 hours. Operators also use two (2) tools to guide them in adjusting the correction factor that take into account the cyanide consumption rate, as well as the variation in residence times depending on milling rates. These are:

- A Mintek online cyanide analyzer to assess the cyanide content at the head of the leach process and to rapidly anticipate variations in cyanide consumption in the circuit; and,
- A control table that assists the operator in evaluating the consumption rate in the leach circuit as a function of the residence time. The table indicates to the operator what circuit head content he should aim for in order to maintain a circuit tail content of around 75ppm for optimized metallurgical gains.

A second Mintek is present at the tail of the leach circuit to optimize cyanide consumption and detoxification costs by increasing the frequency of readjustments of the correction factor.

In the elution circuit, the dosage of cyanide in the sterile solution tank is carried out manually approximately every 2 hours in order to maintain a concentration of approximately 1000ppm in solution to promote desorption of silver. A cascade control has recently been implemented in order to optimize reaction kinetics and potentially reduce the dosages required.

Tailings are thickened and detoxified prior to being pumped to the tailings management area (TMA). Excess water is mainly re-used in the plant or treated prior to being discharged to the receiving environment.

1.2 Tailings management

CMM's TMA and waste rock pile are built on former abandoned tailings, settling and polishing ponds. The first operations on the site date from around 1930. Some of these infrastructures of the past have been covered by new infrastructures. The current TMA consists of eight (8) tailings disposal cells having a total superficie of approximately 350ha, a sedimentation pond, a polishing pond, a final effluent point and an emergency spillway. The design of the TMA is such that water is accumulated entirely outside the tailings disposal cells, but within the TMA.

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Following detoxification, through treatment with hydrogen peroxide and copper sulfate, the tailings, in the form of pulp at about 63-64% solid, are transported from the concentrator to a booster pump via two (2) 24" underground pipes at a flow rate varying from 2300 to 3200m³ / hour. After the booster pump, the lines are subdivided into four pipes which return to the surface. One of these four lines is reserved as an emergency line. The three remaining pipes make it possible to change the line locations while maintaining continuous tailings deposition. From these lines, several pipes branch out to reach the desired deposition points of a cell where tailings are beached at a 1% slope. Pore water and run-off from the tailings disposal cells flow in a southerly direction to the sedimentation pond via a series of collection ditches within the TMA. From the sedimentation pond, the water is either recirculated back to the concentrator, to the polishing pond, or to CMM's water treatment plant if required. This plant treats for metals, suspended solids and, if required, for cyanide. Cyanides are treated with hydrogen peroxide and copper sulfate. Treated water is directed to the polishing pond prior to discharge to the environment. The final mine effluent currently flows into the Raymond stream, then into the Piché River. This river constitutes the outlet of Lake Fournière.

Tailings contained in the disposal cells gradually dry and compact and a new layer of tailings is discharged to the cell according to the sequence provided for in the tailings deposition plan. The maximum elevation the tailings facility is projected to reach 60m at end of use. In anticipation of this end of life, a gradual restoration of certain containment structures has already begun.

The TMA's water ponds are managed as a priority to control significant flood events and not as process water reservoirs (with the exception of the sedimentation pond, which has both roles). The principle of water segregation is applied at CMM: waters from outside of the facility's footprint are diverted as much as possible to the exterior without coming into contact with the mine site. Contact water that meets the environmental release criteria is directed to the polishing pond and discharged to the environment through the final effluent, or, as a last resort, used in the concentrator process.

Contact water that does not meet the environmental release criteria is directed to the sedimentation pond. This water is used for ore processing. Under normal weather conditions, the sedimentation pond is slightly positive. It is therefore necessary to periodically discharge water.

Figure 2, below, illustrates the CMM facilities, including the open pit, tailings management area and milling facilities. To the north of the pit is the town of Malartic.

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A handwritten signature in black ink, appearing to be 'R. B.', written over a light blue horizontal line.May 26th 2021

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Figure 2 – CMM Site Plan

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2.0 AUDITOR'S FINDINGS

This operation is

- | | |
|--|---|
| <input type="checkbox"/> in full compliance | with the International Cyanide Management Code. |
| <input checked="" type="checkbox"/> in substantial compliance | |
| <input type="checkbox"/> not in compliance | |

The Corrective Action Plan to bring CMM from substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

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Audit Team Leader: Ross Szwec
E-mail: ross@eem.ca

Names and Signatures of Other Auditors:



Linda Byron
lbyron@blueheronenv.com

Date(s) of Audit: October 27th to November 19th, 2020

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Code Verification Audit Team Leader, established by the International Cyanide Management Institute (ICMI), 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 Summary 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 Code's Mining Operations Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

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PRINCIPLE 1 - PRODUCTION

Encourage responsible cyanide manufacturing by purchasing from manufacturers who 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 Standard of Practice 1.1**
 in substantial compliance
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- CMM exclusively purchases its sodium cyanide from Cyanco under a Supply contract which specifies that Cyanco (Seller) shall maintain its ICMI certification and remain a signatory to the Code. Furthermore, the Seller’s certification is applicable to both production facilities as well as transportation of sodium cyanide to the delivery location, which is CMM’s mine site.
- Cyanco’s production facilities in Winnemucca, Nevada, was recertified as fully compliant on December 19, 2019.
- Cyanco is the sole supplier of sodium cyanide reagent to CMM.

PRINCIPLE 2 - TRANSPORTATION

Protect communities and the environment during cyanide transport.

Standard of Practice 2.1 *Establish clear lines of responsibility for safety, security, release prevention, training and emergency response in written agreements with producers, distributors and transporters.*

The operation is

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

Summarize the basis for this Finding/Deficiencies Identified:

- The Supply Cyanide supplier contract responsibilities extend to all production, distributors, transporters used.
- The supply contract specifies that Cyanco is responsible for the safe delivery of the product at CMM’s mine site. Cyanco’s supply chain, from production sites in the USA to the Cadillac Terminal, is certified on the basis of the 20 July 2018 Cyanco North America Rail and Truck Supply Chain re-certification audit. In addition, the supply contract with CMM also specifies that Cyanco’s contracted transporter is to comply with ICMI’s principles.

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Standard of Practice 2.2

Require that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management.

The operation is

- in full compliance** **with Standard of Practice 2.2**
 in substantial compliance
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- Transporters used have been certified under Cyanco's most recent North American rail and truck supply chain audit.
- CMM maintains copies of reception forms and bills of lading that show the chain of custody between Cyanco's Cadillac distribution facility and CMM. Transporters indicated on the bills of lading are included in the scope of Cyanco's North American rail and truck 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 Standard of Practice 3.1**
 in substantial compliance
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- The facility maintains a database of drawings related to the design and construction of the cyanide unloading and storage facilities.
- CMM retained the services of an engineering firm to conduct an audit in 2019 and 2020 to confirm that the facilities were constructed in accordance with sound engineering practices and International Cyanide Management Code (ICMC) requirements. The audit was conducted by a two (2) person team consisting of a chemical engineer with 25 years' experience acting as lead auditor and a mechanical engineer with experience in chemical process management.
- The audits concluded that the installations associated with cyanide are built in accordance with sound engineering practices. *The 2020 report confirms that the structures are located on concrete but recommends further investigation to confirm that the joints between the foundation and walls to ensure containment. A Corrective Action Plan (CAP) has been prepared by the company to address this item.*

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- The cyanide unloading area is constructed of visually sound concrete and has been constructed such that any spills during unloading would report to a sump that is pumped into the mill to the lime circuit sump.
- Unloading facilities are away from general traffic at the facility and barricades are set up when unloading is taking place, restricting access to the general area. The unloading facilities are away from any surface waters.
- Storage facilities are located within the mill facility grounds – away from people and surface water. Security restricts access to the site. The site is further bounded by a security fence and security cameras are in place to observe the facility, including cyanide storage areas, at all hours. There are no incompatible materials stored in the vicinity of the cyanide storage tanks.
- Cyanide storage tanks are located outside of the mill on concrete, with concrete secondary containment walls and are equipped with level indicators and alarms. Level detectors are on a preventative maintenance program that requires regular calibration. There is additionally a procedure that requires that the mill operator verifies the capacity in the tank before unloading.
- CMM conducted an audit of the capacity of the secondary containment within the mill and found that it was sufficient to contain any leakage from the storage tanks.
- There is no cyanide mixing at the facility. Sodium cyanide is received in bulk aqueous solution (30% nominal).

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
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- There is no cyanide mixing at the facility as cyanide is received in bulk, liquid form.
- The facility uses only bulk, pre-dyed liquid cyanide shipped by truck; no containerized cyanide is used. As such, empty cyanide containers are not generated.
- Procedures are implemented to prevent exposure and releases during cyanide unloading and address: required personal protective equipment, specific to the tasks involving cyanide; the operation of valves and couplings during offloading; and spill prevention, clean-up and decontamination.
- Kamvalock « dry disconnect » couplings are used during the cyanide bulk off-loading. This type of coupling eliminates spillage of any residual liquid contained within the line after disconnection. Should residual cyanide be present on hose connections and couplings on tanker trucks following an offload event, the facility’s procedure for cyanide leaks would be applied.

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- Unloading operations are observed by CMM mill operators from a safe distance as well as security personnel via security cameras.

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 utilizing contingency planning and inspection and preventive maintenance procedures.

The operation is

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

Summarize the basis for this Finding/Deficiencies Identified:

- The operation has developed and implemented programs, procedures and operating systems that are designed to protect human health and the environment including contingency planning, inspection and preventive maintenance procedures and tailings area management. These take into account the assumptions and parameters on which the facility design was based and include applicable regulatory and other requirements. Note that there are no cyanide mixing or heap leach operations at the facility.
- Inspections and preventative maintenance occur at determined frequencies and cover all key components of the operation, with particular attention to cyanide pipelines, tanks and systems, and tailings distribution, discharge and storage systems. Records of inspections and maintenance activities are maintained in the facility's computer maintenance management system.
- CMM's tailings operations, monitoring and surveillance (OMS) manual outlines actions required when identified through inspections or other monitoring activities and addresses water balance upsets.
- Mill operations and Effluent Treatment Plant procedures outline inspection and monitoring processes and actions to be taken in the event of deviations.
- Backup systems (emergency generators (13)) are in place to run critical equipment during power outages to prevent unintentional releases. Backup systems are regularly tested. The generators are on a monthly preventative maintenance schedule. Annually, the generators are inspected by the original equipment manufacturer (including tests under load).
- Based on the information reviewed, CMM has implemented comprehensive inspection programs for the site's cyanide facilities on a frequency sufficient to assure they are functioning within design parameters.
- CMM has established and implemented a management of change procedure that includes a process to identify when changes to the cyanide systems are involved. Environmental

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the facility's probabilistic water balance which was completed using GoldSim Technology Group's proprietary modelling software. The review included an update of the water balance with actual precipitation data to end of 2018 based on the Val d'Or station information.

- The water balance includes design operating ranges, including tailings pond freeboard. The tailings OMS manual takes these operating ranges into consideration through inspections and other monitoring actions to prevent the overtopping of ponds and impounds and unplanned discharges.
- The facility's Tailings Operations Manual includes a discussion of modifying operations based on actual precipitation and meteorological data, in particular in the event of heavy precipitation. In addition, the manual discusses an annual planning process whereby precipitation events that can affect the TMA are taken into account with respect to water management including discussions regarding the consideration of live meteorological and precipitation data obtained from a nearby (i.e., 25km) meteorological station in the management of water within the TMA.
- The facility does not operate any leach pads.

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
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- Historical data indicates that the maximum value of Weak Acid Dissociable (WAD) cyanide in the tailings pond is on the order of 13.5mg/L.
- There have been no recorded mortalities of birds or wildlife associated with cyanide concentrations in water and toxicity testing on the facility's effluent indicates that the water being discharged is not toxic to fish or daphnia.
- The facility's open water areas, which are all located within the tailings management area, do not exceed 50 mg/L WAD Cyanide. Tailings water has not exceeded 25mg/L WAD CN. Note that there are no heap leach operations at this facility.

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
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

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- CMM is in Full Compliance with Standard of Practice 4.5, which requires that measures be implemented to protect fish and wildlife from direct or indirect discharges of cyanide process solutions to surface water.
- During the last 5 years, the maximum concentration of WAD cyanide in CMM’s final effluent discharges was 0.180 mg/L.
- A formal mixing zone has not been established, however, downstream monitoring of the receiving water takes place. A review of receiving water data over the last 5 years indicates that free cyanide has not exceeded 0.022 mg/L. In addition, final effluent results were mostly below this value over the last 5 years, ensuring that receiving waters do not exceed 0.022 mg/L free cyanide.
- There have been no indirect discharges from the operation that have caused cyanide concentrations in surface water to rise above levels protective of a designated use for aquatic life. In addition, toxicity testing on the facility’s effluent indicates that the water being discharged is not toxic to fish or daphnia.

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
- not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- CMM is in Full Compliance with Standard of Practice 4.6, which requires that the operation implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater. Note that the operation is currently an open pit mine and does not use tailings as underground backfill.
- The facility’s tailings management area foundations consist principally of clay or till. Studies were undertaken by Golder prior to the construction of the TMA to identify areas where additional clay or till would be required in order to limit seepage.
- Tailings are beached at a 1% slope. Pore and run-off water from the tailings disposal cells flow to the sedimentation pond via a series of collection ditches. From the sedimentation pond, the water is either recirculated back to the concentrator, to the polishing pond, or to CMM’s water treatment plant. Tailings contained in the disposal cells gradually dry and compact and a new layer of tailings is discharged to the cell according to the sequence provided for in the tailings deposition plan.
- Sampling of groundwater wells around the tailings management area takes place twice per year. Analysis results confirm that cyanide in groundwater does not exceed 0.022 mg/L and hence does not result in free cyanide in excess of 0.022 mg/L released to surface water.
- Seepage from the operations has not caused cyanide concentrations in groundwater to rise above levels protective of beneficial use. As such, the facility has not engaged in any remedial activities.

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- Groundwater monitoring data is reviewed by an external consultant and compiled into an annual report for submission to regulatory authorities. The results of the groundwater monitoring show no impact.

Standard of Practice 4.7

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

The operation is

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

Summarize the basis for this Finding/Deficiencies Identified:

- Process tanks, pipelines, secondary containment and other cyanide system pipelines (tailings) are constructed of materials that are compatible with cyanide and high pH conditions. Cyanide solution containing tanks are mounted on concrete foundations with concrete secondary containment structures. Note that no cyanide mixing occurs at this facility.
- An external engineering firm completed a study and provided a report that included a review of "all spill prevention through design" based on piping and instrumentation diagrams, piping specifications, and installed equipment." The report recommends further investigation to confirm that the joints between the foundation and walls to ensure containment. A CAP has been prepared by the company to address this item.
- Sufficient secondary containment measures are in place for tanks to ensure there is no risk to the environment or safety in the event of a spill. Containment areas in the mill drain into an area that is pH controlled. All waters collected in secondary containment are pumped back into the process using dedicated submersible pumps. No secondary containment waters are discharged to the environment. Secondary containment areas are monitored visually during regular daily inspections and some are monitored remotely by camera.
- The facility has confirmed, through calculations, that the current secondary containment for the cyanide solution tank, leach tanks, thickener tank and unloading areas are capable of holding a 110% of the volume of the largest tank. This is in line with jurisdictional requirements and sufficient to receive drain back from piping to the containment area and storm events.
- Two portions of the pipeline that are buried between the thickener tanks and leach tanks (that contain high levels of cyanide) are continually monitored with a pressure loss detection system. In addition, the pipelines are routinely tested for thickness and continuity (tests under pressure and thermal imagery). In the event of a leak, spills from these pipelines would flow to an emergency collection pond and be captured for return to the mill.
- There is a single-walled tailings pipe that is buried between the mill and the tailings pump station. Actions have been taken to ensure that spills from this pipeline do not reach the environment including validation that any breaks in this buried line would be directed to a containment area for recovery and monitoring of downstream groundwater wells for indications of potential leakage.

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

Summarize the basis for this Finding/Deficiencies Identified:

- Engineering and construction oversight for new cyanide facilities is undertaken by third parties. Quality assurance and quality control (QA/QC) measures are developed and implemented by third party engineering firms. These include assurance programs related to the suitability of materials and adequacy of earthworks.
- Since some historical QA/QC records could not be located, the facility retained an external engineering firm to review the the entire cyanide system and confirm that it was built in accordance with standard engineering practice and met the requirements of the Code. The report concluded that the installation of cyanide structures was in accordance with original designs, including pipeline and tanks. Where modifications have been made, installations are compatible with cyanide use. The report, however, recommends further investigation to confirm that the joints between the foundation and walls to ensure containment. A CAP (Corrective action plan) has been prepared by the company to address this item.

Standard of Practice 4.9

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

The operation is

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

Summarize the basis for this Finding/Deficiencies Identified:

- The facility monitors cyanide in process discharges to surface water and in surface and ground waters down gradient of the site, in accordance with regulatory requirements.
- The operation has written standard procedures for monitoring activities for wildlife, surface and groundwater quality. These procedures have been prepared by appropriately qualified persons. The procedures contain information on how and where samples should be taken, sample preservation techniques, chain of custody procedures, shipping instructions, and cyanide species to be analyzed. Sampling conditions are also documented in writing.
- CMM inspects for, documents and reports wildlife sightings including any mortalities that may be associated with cyanide. Wildlife mortality inspections are typically conducted on a monthly basis. However, all workers are aware that dead, injured or otherwise impacted wildlife must be reported. To date, there have been no animal mortalities due to contact with or ingestion of cyanide solutions.

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- Monitoring is conducted at frequencies adequate to characterize the mediums being monitored and to identify 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 and livestock.

The operation is

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

Summarize the basis for this Finding/Deficiencies Identified:

- The operation has prepared a comprehensive Closure Plan that is in line with jurisdictional requirements and includes plans for decommissioning facilities, equipment and materials that are contaminated with cyanide.
- The facility commissioned a consulting firm to prepare a Technical Memorandum regarding the decommissioning of all cyanide associated equipment and infrastructure currently found at the site. The report was prepared as a supplement to the facility's closure plan and includes a four (4) stage plan for decommissioning. The third stage includes the cleaning of cyanide contaminated equipment within a period of 6 months of closure.
- Provincial regulatory requirements (Quebec) require that mine closure plans be reviewed on a minimum 5-year frequency. The Technical Memorandum aligns with this legal requirement and requires a review of the decommissioning plan as well as its implementation costing every five years.

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
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- The site has established financial assurance capable of fully funding decommissioning the operation, including cyanide related structures.
- The facility commissioned a consulting firm to prepare a Technical Memorandum regarding the decommissioning of all cyanide associated equipment and infrastructure currently found at the site. The Memorandum was prepared as a supplement to the facility's closure

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plan and identifies the detailed costs related to third-party decommissioning of cyanide facilities. This costing is provided as financial assurance (via a letter of credit) to the provincial government to cover site remediation and post closure monitoring activities and is reviewed every 5 years.

- The provincial regulatory agency will review and assess both the Closure Plan and the Technical Memorandum prior to approval and will influence the level of financial guarantees CMM must provide.

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 or control them.*

The operation is

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

Summarize the basis for this Finding/Deficiencies Identified:

- CMM has developed and implemented a large number of procedures to ensure that cyanide-related tasks are performed in a safe manner. The procedures reviewed include health and safety components such as required personal protective equipment. Procedures are reviewed and approved by technical and supervisory staff.
- At the mill, procedures are reviewed with the participation of mill staff and personnel, including health and safety procedures and procedures that contain health and safety components.
- The facility has implemented an internal cyanide work permit process where a work permit is required when work on the cyanide circuit is required. In addition, the site has implemented pre-work inspection processes within their work planning process.
- The site has established and implemented a management of change procedure that includes a process to identify when changes to the cyanide systems are involved. The process requires that a review team, including the health and safety superintendent, review and approve the proposed change for health and safety considerations. The process includes triggers for revisions to procedures and controls.

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 Standard of Practice 6.2**
- in substantial compliance

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not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- CMM is in full compliance with Standard of Practice 6.2 and operates and monitors cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety issues.
- The site operates the plant with established pH settings to ensure that evolution of hydrogen cyanide (HCN) gas is limited during production. These settings are included in process instructions and procedures and communicated to staff through training. Control panels within the mill include pH settings and alarms. HCN detectors are set to alert at 4.7ppm (pre-alarm / area evacuation] and 10 ppm (general evacuation).
- The facility monitors HCN through fixed and personal detectors that are maintained and calibrated. Procedures and training documents outline action to be taken as a function of the HCN concentration.
- Emergency eye wash and showers are located at key locations throughout the facility. These emergency stations are regularly tested.
- Signage is present where cyanide is present indicating the use of cyanide and the need for the use of personal protective equipment, which are also specified in procedures.
- Dry powder portable fire extinguishers are in place throughout the mill and are inspected on a monthly basis.
- Cyanide piping and tanks are identified with purple arrows indicating the direction of flow. Workers are trained on how to identify cyanide facilities with the purple standard.
- Safety Data Sheets are available at operator computer stations (and available in French; the working language) throughout the mill as well as at the first aid station. All procedures, including First aid procedures, are developed and implemented in French.
- The facility records and tracks incidents and accidents, including those involving cyanide. The process includes identifying persons responsible for actions, including the review of procedures and programs to protect worker health and safety and the environment.

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
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- The facility has developed and implemented emergency response plans and procedures to respond to work exposure to cyanide (both liquid and HCN gas).
- The Nurses Station is equipped with medical oxygen, defibrillators and cyanide antidote kits. This equipment is maintained and inspected. Cyanide antidotes are stored as per manufacturers recommendations (i.e. <25 oC) and have expiry dates listed. Expired cyanokits are taken out of regular service prior to expiring and used for training purposes.

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- The facility is equipped with potable water throughout the operation where cyanide is utilized, as well as showers and eye wash stations at all appropriate locations where cyanide is present.
- Mill operators carry radios and telephones are available throughout the site.
- There are a number of alarm systems throughout the site where cyanide is used (for ambient air monitoring, pipeline breaks, pH, tank levels).
- An emergency response team has been established and members are available 24 hours a day, 7 days a week to respond to cyanide exposures.
- In the event of an emergency, local ambulance responds to transport employee to the hospital – first responders can provide oxygen. Administration of cyanide antidote, by injection, can only be conducted by a nurse or doctor.
- CMM has written communication with local hospital officials describing that the company utilizes cyanide and that exposures are possible. CMM also provided information regarding cyanokits.
- The facility plans and executes mock scenarios to test a variety of emergencies, including cyanide exposure scenarios.

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
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- CMM has prepared and implemented detailed emergency response plans and procedures for potential cyanide releases, including preparation and response processes.
- The contract between CMM and its cyanide supplier specifies that the supplier is responsible for complying with applicable environmental, transportation and safety regulations and ICMI’s principles, standards of practice, performance goals and certification requirements as well as certification audit recommendation that are applicable to the supplier’s production, distribution and transportation facilities.
- CMM’s cyanide supplier recertification audit included review of emergency response capabilities to confirm that they meet the intent of ICMI. The recertification audit included the review of the emergency response plan of the transport company used by the cyanide supplier.

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- A risk assessment has been completed (and is maintained) specifically focusing on cyanide risks and includes exposure to HCN and liquid cyanide releases and controls that are in place for each risk. The cyanide risk assessment considers transportation, unloading, cyanide releases during a fire and explosion, tank, pipeline and valve failures, pond and dam overtopping, power outages and pump failures. The risk assessment further considers uncontrolled seepages, malfunctions of the cyanide destruction plant, failure of the tailings impoundments and all cyanide facilities.
- The Emergency Response Plan outlines measures for the administration of cyanokits (antidote) and other first aid measures, and specifically deals with cyanide spills and releases and their control and containment, assessment, mitigation and clean up.
- The incident and accident management procedure includes requirements to investigate all incidents and identify measures to prevent re-occurrences.

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
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- CMM is in Full Compliance with Standard of Practice 7.2 and involves site personnel and stakeholders in the emergency planning process.
- The facility involves the workforce in the risk assessment processes, including cyanide risk assessments. They also consult with personnel and workers regarding the development of procedures, including the Emergency Response Plan.
- The Emergency Response Plan has been shared with the local fire department and the local hospital has been sent information regarding the potential for cyanide incidents and the support required in this regard.
- Although the mine is located in the town of Malartic, the mill facilities are far removed from any private homeowners or businesses. A release of cyanide at the mill site would not affect the community. During transportation on the mine access road, a cyanide spill would be directed to a containment pond which would not impact the community.
- CMM utilizes local external agencies (paramedics and fire department) during emergency planning and simulations. The firefighters from the community of Malartic participated in an on-site training session involving cyanide. In addition, the site has contracted an external specialized service provider to respond to spills including cyanide related spills
- CMM has written communication with local hospital officials describing that the company utilizes cyanide and that exposures are possible. CMM also provided information regarding cyanide antidotes to the hospital and met with hospital executives that have agreed and assured the facility that they would be able to treat cyanide exposures. The hospital in nearby Val d'Or (<25km) also maintains a cyanokit in the emergency room and is aware of the potential for cyanide exposures at CMM.

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- Local ambulance service is available to transport employees to hospitals and first responders/nurses will provide oxygen and cyanokits to the paramedics for their application of treatment.
- The facility has attempted (several times) to make written agreements with local hospitals regarding cyanide exposure treatment, however the hospitals are not willing to sign the agreement.

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
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- CMM’s Emergency Response Plan outlines roles and responsibilities during emergencies as well as a list of equipment available on site and through external service providers. In addition, the cyanide supplier and transportation company maintain emergency response procedures that outline what equipment they have available for potential emergency events during transportation.
- The local community fire department will respond to fires at the facility and paramedics from the local hospital will respond to emergencies at the site as required.
- CMM’s emergency response plan:
 - Designates primary and alternate emergency response coordinators who have explicit authority to commit the resources to implement and deploy the plan;
 - Identifies the emergency response team members as well as their roles and responsibilities during an emergency event;
 - Includes a summary of emergency response team training requirements while the Emergency Response Coordinator maintains detailed plans for training and refreshers for the responders;
 - Includes the Emergency Response Coordinator’s 24-hour contact information. The Emergency Response Coordinator maintains the call-out list for Emergency Response Team members, including their 24-hour contact numbers; and,
 - Includes requirements to inspect all emergency equipment monthly. A procedure is in place for the inspection and included a documented checklist.

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
 not in compliance

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Summarize the basis for this Finding/Deficiencies Identified:

- The facility is in Full Compliance for Standard of Practice 7.4. CMM has developed procedures for internal and external emergency notification and reporting.
- The Emergency Response Plan includes a list of internal and external personnel that require notification in the event of an emergency, including management, regulatory agencies and outside response providers, the community and medical facilities.
- CMM's crisis management plan defines a number of situations, including important cyanide events, which would require notification of potentially affected communities, including necessary response measures, and communication with media.

Standard of Practice 7.5

Incorporate into response plans and remediation measures monitoring elements that 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
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- CMM's Emergency Response Plan refers to remediation measures in the event of a cyanide release. No cyanide treatment chemicals would be used by the facility and no reagent-grade cyanide solids are present.
- The Emergency Response Plan and procedures specifically refers to cyanide spills, and outlines requirements for spill clean-up, including recovery of solutions. For small spills, these would be recovered using «Magic Sorb », an aluminum silicate hydrophilic absorbant. Larger spills would be rinsed with large quantities of water and directed to the concentrator process. Outside spills to soil or other would initiate implication of external specialists. The external specialist would be responsible for analyses to be performed including what final cyanide concentration will be allowed in residual soil as evidence that the release has been completely cleaned up. Additionally, the external specialist would be responsible for the appropriate disposal of soils and other media contaminated with cyanide including the provision of proof of disposal / destruction.
- The facility prohibits the use of sodium hypochlorite, ferrous sulphate or hydrogen peroxide to treat cyanide in surface water spills.
- Procedures outline monitoring requirements in the event of a spill, including methodologies and parameters, and where there are potentials for spills to surface water, sampling locations have been outlined.

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**

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- in substantial compliance
- not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- The facility periodically evaluates response procedures and capabilities and revises them as needed.
- The Emergency Response Plan is regularly updated, and the facility plans and conducts mock scenarios to test a variety of emergencies, including cyanide exposure scenarios.
- As part of the debrief process following an incident, procedures, including emergency response plans, are considered for the need for revisions.
- There have been no major cyanide related incidents or emergencies at the site to date.
- Three (3) near miss incidents and one minor at-risk incident have been recorded at the facility between October 2016 and February 2020. These were:
 - Near miss incident: Cyanide crystals appearing on a pipeline inside the mill;
 - Near miss incident: Maintenance workers working in the vicinity of cyanide were not aware of the injection point;
 - Near miss incident: Maintenance activity causing small leak of cyanide inside the mill. No injury or environmental impact; and,
 - At-Risk incident: Small spill of cyanide that did not reach the environment (2 liters into pail).

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
- not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- CMM trains workers to understand the hazards associated with cyanide use. All personnel, including contractors, accessing the facility receive orientation that includes hazards related to cyanide use and that it is utilized in the mill.
- A training program has been developed and implemented for cyanide hazard training that includes the uses of cyanide, the dangers associated with it, first aid measures and control measures. Training profiles based on job descriptions have been developed. All personnel that work in the mill receive additional training around cyanide hazards and dangers. This is refreshed annually.

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- Emergency Response personnel receive annual refresher training on cyanide and other chemical response measures.
- Training records are retained in hard copy and tracked electronically.

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
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- CMM trains appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.
- Training is completed on the procedures in place, including tasks associated with unloading, production and maintenance. The procedures include considerations for worker health and safety and the prevention of unplanned cyanide releases.
- Mill trainers receive, in addition to training typically required by operators, such as general environment, health and safety, reagent handling, cyanide specific, Workplace hazardous materials information system (WHIMIS), lock out tag out, confined space, respirator use and maintenance, etc., train-the-trainer training specific for mill trainers.
- Theoretical training is performed with quizzes to test understanding. In addition, job observations related to the procedures are completed.
- All personnel that work in the mill receive additional training around cyanide hazards and dangers. This is refreshed annually. All personnel receive training prior to working with cyanide, including peer-to-peer training and formal training from the training department.
- Emergency Response personnel receive annual refresher training on cyanide and other chemical response measures. Other personnel receive periodic refresher training, including being involved in scheduled mock scenarios (e.g., environmental staff, tailings operators and various other staff that may encounter cyanide).
- Training records are retained in hard copy by the human resources department. Hard copy training records include the name of the employee, trainer, date of training, reference to procedure or presentation and quiz demonstrating understanding of training material.
- An excel file related to cyanide training records summarizes training completed, while a database (Access) tracks training completion and requirements.

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

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not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- Workers, including company personnel and contractors, are trained to respond to cyanide incidents through orientation training and regular refreshers.
- Training for all mill personnel, including unloading production and maintenance staff, includes procedures to be followed in the event of a cyanide release.
- Unloading operators are observed by peers until they are deemed competent to complete the task. The offload procedure is reviewed prior to each offload.
- Site Emergency Responders (cyanide response personnel) as well as operators, unloading operators, and production and maintenance workers receive training regarding decontamination and first aid.
- Site Emergency Responders receive training regarding the Emergency Response Plan for cyanide, including necessary equipment (personal protective equipment and response equipment). The team also receives regular hazardous substance response training as part of their certifications. The Emergency Response Plan outlines training requirements for Emergency Responders.
- Personnel involved in responding to cyanide incidents are involved in annual cyanide mock scenarios.
- The Emergency Response Plan has been shared with the Malartic Fire Department and the local hospital has been sent information regarding the potential for cyanide incidents and the support required in this regard. The firefighters participated in an on-site training session, involving cyanide, in 2019.
- CMM has written communication with local hospital officials describing that the company utilizes cyanide and that exposures are possible. CMM has also provided information regarding cyanokits.
- The facility plans mock scenarios to test a variety of emergencies, including cyanide exposure and environmental release scenarios. Personnel involved in responding to cyanide incidents are involved in annual cyanide mock scenarios. A schedule for the scenarios is in place, and forms are used to debrief the exercises so that lessons learned are documented and actioned. Changes to training and skills upgrading requirements are assessed during the debrief. Due to the Covid-19 pandemic, the mock scenario schedule had to be adjusted and some mock exercises postponed in 2020. A cyanide spill mock drill was conducted on November 4, 2020.
- Training records are retained in hard copy by the human resources department. Hard copy training records include the name of the employee, trainer, date of training, reference to procedure or presentation and quiz demonstrating understanding of training material.
- An excel file related to cyanide training records summarizes training completed, while a database (Access) tracks training completion and requirements.

PRINCIPLE 9 – DIALOGUE

Engage in public consultation and disclosure.

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Standard of Practice 9.1

Provide stakeholders the opportunity to communicate issues of concern.

The operation is

- in full compliance** **with Standard of Practice 9.1**
 in substantial compliance
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- Stakeholders are provided with a number of opportunities to communicate concerns, including cyanide concerns as follows:
 - The facility holds at least one meeting with stakeholders on a yearly basis as required by legislation in the Province;
 - The facility has established a community committee that meets on a quarterly basis. The committee's objective is to provide a venue for feedback and communication from the community to the company;
 - The company provides a toll free and confidential telephone number managed by an independent vendor specialized in acknowledging reception of a complaint; and,
 - Stakeholders are also invited to provide feedback or complaints directly on the company's Internet website, and specifically the Community page and via email (address is posted on the internet site).

Standard of Practice 9.2

Initiate dialogue describing cyanide management procedures and responsively address identified concerns.

The operation is

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

Summarize the basis for this Finding/Deficiencies Identified:

- CMM holds at least one meeting with stakeholders on a yearly basis as required by legislation in the Province. In addition, the facility has established a community committee that meets on a quarterly basis. The committee's objective is to provide a venue for feedback and communication from the community to the company. The minutes of meetings are posted on a website for community information.
- The company additionally distributes a newsletter to the stakeholders and has included cyanide information and ICMC certification information in the past. The company also actively communicates through it's website.
- The attendants at the local mining museum, that is located adjacent to the mine and is partially funded by CMM, are trained by CMM personnel to respond to cyanide related questions by visitors.

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Standard of Practice 9.3

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

The operation is

- in full compliance** **with Standard of Practice 9.3**
 in substantial compliance
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

- CMM provides relevant operational and environmental information to their stakeholders, including cyanide-related information.
- The facility has regular (government mandated) public meetings and provides verbal and written communication to the community (cyanide leaflet).
- The company has formed a local citizen's group and has put in place mechanisms to receive feedback from the community and other stakeholders. Presentations have been made to this group regarding cyanide related issues.
- The company's website further provides cyanide-specific information.

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