

ICMI Production Verification Protocol (Revision June 2021)

Summary Audit Report

Draslovka North American Production & Packaging

2022 Re-Certification Audit

Draslovka



Submitted to:

The International Cyanide Management Institute
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Operation General Information

Operations Audited:	Draslovka Memphis Plant 2571 Fite Road Memphis, TN 38127 LSI Facility 5200 Old Millington Road Memphis, TN 38127 Draslovka Carlin Facility 3 mi. E. of Carlin, Old Hwy 40 Carlin, NV 89822
Audit Scope:	Sodium Cyanide Production & Packaging Operations
Names and contact information for this facility:	Joaquín Corres Barragán Customer Facing Technologies Manager Draslovka Mining Solutions Email: joaquin.corres@draslovka.com


Company Background Information

Draslovka Mining Solutions (previously Chemours Mining Solutions) manufactures solid sodium cyanide for the gold mining sector. Draslovka Mining Solutions is part of the Draslovka Holding a.s. company, which is headquartered in Prague, Czech Republic. Draslovka originally started operating in 1906 and dedicated to producing cyanide-based chemicals globally. Draslovka Mining Solutions (referred to as “Draslovka” in this report) is headquartered in Wilmington, Delaware in the United States and produces sodium cyanide at the Memphis, Tennessee plant. The plant is located just outside of Memphis in Woodstock, Tennessee.

Draslovka (under the previous company names of DuPont and Chemours) was one of the original 14 Cyanide Code signatory companies announced on November 3, 2005. As such, Draslovka made the commitment to obtain Cyanide Code certification for its Memphis Solid Cyanide Plant and its packaging operations adjacent to the Memphis Plant and in Carlin, Nevada. Draslovka was the first Cyanide Producer to achieve certification in June 2006 and has successfully maintained compliance and its International Cyanide Management Code (Cyanide Code) certification since.

This recertification audit of Draslovka and its North American cyanide packaging operations was conducted according to the ICMI certification auditing process that calls for each signatory organization to undergo a third-party recertification audit every three years.

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Description of the Operations

The Draslovka sodium cyanide production operation is just one of several chemical operating units at the Draslovka-owned multi-tenant chemical plant. Draslovka has been producing sodium cyanide at this location since 1953. The solid sodium cyanide briquettes are packaged at the Memphis Plant, at the LSI Facility directly adjacent to the plant, and at the Draslovka packaging facility in Carlin, Nevada, USA. The Memphis facility ships sodium cyanide in bulk and semi-bulk packages.

The LSI facility re-packs the sodium cyanide briquettes for the gold mining sector from rail hopper cars into semi-bulk (bag-in-box intermediate bulk containers). The LSI facility has been in operation since 1994. The LSI facility is owned by Lemm Corporation and is operated by Lemm Services, Inc.

The Draslovka Carlin facility is operated by the Lemm Corporation. This operation trans-loads the cyanide briquettes from rail hopper cars into ISO tanks and tank trailers. The Carlin facility also dissolves sodium cyanide in alkaline water to make a nominal 30% sodium cyanide solution. Carlin has been in operation since 1982. The Carlin facility is owned by Draslovka and is operated by the Lemm Corporation.

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A handwritten signature in dark ink, appearing to read 'Rayo J. J.', is written over a horizontal line.

Signature of Lead Auditor

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Date



Auditor's Finding

Cyanide handling and management practices at the three locations were evaluated against 2021 ICMI Code Cyanide Production Verification Protocol requirements, the organizations' procedures and supporting documents. The audit was conducted through discussions and interviews with management, production, and packaging personnel at each of the three operations.

Additionally, records were reviewed, and observations of current practices were made. The evaluation of records since the last recertification audit in 2019 and current operational practices were the focus of the audit. The auditor used the ICMI "Cyanide Production Verification Protocol" to confirm that records demonstrated continued Cyanide Code compliance since the previous recertification audit in 2019.

The auditor found that the overall level of preparedness and understanding of Cyanide Code requirements was excellent. Management systems were found to be very mature, personnel demonstrated excellent operational discipline, the facility was very well maintained and organized, and records were readily available for review.

The operation has not experienced any significant cyanide incidents since its original certification audit in 2006.

The results of the audit indicated that all three operations continue to be in FULL COMPLIANCE with Cyanide Code requirements.


Compliance Statement

This operation did not experience any compliance issues or significant cyanide incidents during the recertification period.

Auditor Information

Audit Company:	CN Auditing Group www.cnauditing.com
Lead / Technical Auditor:	Ralf Jurczyk, Ph.D. E-mail: rj@cnauditing.com
Dates of Audit:	December 5-8 and 12-13, 2022

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Auditor Attestation

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

I attest that the audit reports accurately describe 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 Verification Protocol for Cyanide Production Operations and using standard and accepted practices for health, safety and environmental audits.

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Principles and Standards of Practice - Cyanide Production Verification Protocol

Principle 1 | OPERATIONS

Design, construct and operate cyanide production facilities to prevent release of cyanide.

Production Practice 1.1

Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.

All three facilities were built using sound, accepted engineering practices and quality control processes. Process hazard analysis methods and procedures were used to design and build all three facilities. Draslovka Quality Control & Quality Assurance (QC & QA) records audited during the initial certification audit were found at that time to be complete and readily retrievable. Draslovka uses a formal management of change (MOC) process to manage all changes to the facility. Management of Change (MOC) records from facility changes since the previous Cyanide Code recertification audit in 2019 were reviewed and were found to be complete. Records showed that an Environmental, Health and Safety professional approved the MOCs. Additionally, records reviewed during this recertification audit showed that qualified American Petroleum Institute (API) inspectors continue to perform regular inspections and tests of the equipment. Technical specifications for acceptable materials of construction are formally defined and a review of records confirmed that materials conformed to internal requirements.

No substantial facility changes were made at the LSI and Carlin facilities since the previous Cyanide Code audit. Changes to either of the facilities or any of the processes that meet the criteria outlined in the MOC procedures would go through a formal review process with multiple approvals, including the approval of an Environmental, Health, and Safety professional.

Process equipment at all three facilities was constructed of materials that are compatible with solid cyanide and cyanide solutions. Materials used in the processes at all three facilities are listed in the Draslovka corporate product & service index and any changes to materials must be approved through the MOC process.

Automatic safety interlock systems, level indicators, and high-level alarms are integral parts of the design and construction of each of the facilities. These safety systems are designed to stop the flow of solid and liquid cyanide if there is a power outage and/or equipment failure. All facilities use management system procedures and forms to inspect their interlocks, process equipment, piping, and containment systems regularly to ensure functionality and integrity.

Process Hazard Analyses (PHAs) are performed every five years for high hazard processes. The need for additional or different interlock technology is evaluated during this PHA process. Records were available for all three facilities for 2020-2022 (recertification period) to show that

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the interlocks and alarms are being tested and confirmed to be operating as intended at appropriate frequencies.

Cyanide is managed over concrete at all three facilities to prevent seepage to the subsurface. The concrete at each location was observed to be in acceptable condition. Each facility also has appropriate containment systems that ensure full containment and prevent spills to the environment.

Secondary containment areas for process and storage tanks are constructed of concrete to provide a competent barrier to leakage and are inspected regularly at all three locations. Records for the recertification period were available and were found to be complete. They are of sufficient size to hold a volume greater than that of the largest tank or vessel within the containment area, any piping draining back to the tank, and have additional capacity to allow for a storm event (12 inches). Tank and potential spill calculations were reviewed and were found to be acceptable.

All pipelines and the Draslovka and LSI facilities are managed over concrete with appropriate spill prevention programs that are regularly inspected by qualified inspectors. Most of the pipelines (all except a 40-foot section of welded pipe) are over concrete. All pipelines are managed with appropriate spill prevention programs, including daily inspections of the pipeline for leaks, damage, and/or corrosion.

Solid sodium cyanide is protected from moisture at all three facilities. At the Draslovka plant and the Carlin facility the cyanide is contained in either the process equipment or in shipping containers that are sealed to prevent moisture. All cyanide-related operations including packaging and rail car loading / unloading are under roof and the product is always protected from rain and moisture. The only operation with a finished goods warehouse is LSI. The warehouse is under roof and product is always protected from the elements.

The ventilation at each location was found to be appropriate for preventing the build-up of hydrogen cyanide (HCN) gas. Operators monitor cyanide using personal cyanide detectors and fixed point HCN monitors. Powerful ventilation systems and dust collection systems are in use at all three locations. Preventive maintenance records for the ventilation systems were checked at each of the facilities. Records were available and complete.

Each location is fully fenced with strict access controls and security measures in place. There are no incompatible materials stored in areas where cyanide is present at any of the locations. The introduction of chemicals onto the sites is controlled using a formal process in which environmental, health, and safety professionals must approve any new chemical being brought onto the site and determine where it may be used. Interviews confirmed that one consideration made during this process is whether there is a chemical compatibility concern.

Finding: Is the operation in full compliance, substantial compliance, or non-compliance with Production Practice 1.1?

Full Compliance Substantial Compliance Non-Compliance

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Production Practice 1.2

Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

All three operations have detailed procedures, work instructions and checklists that enable them to operate in a safe and environmentally responsible manner. Additionally, robust training programs at the three operations include competency evaluations to ensure that personnel are competent to operate the production and packaging equipment. Operational procedures detail what steps must be taken in case of an upset condition or emergency that may have a potential for cyanide exposures or releases. Contingency procedures are also in place at all three locations to help employees manage upset conditions. The necessary actions for responding to an emergency are detailed in each locations respective Emergency Response Plan (ERP).

Detailed Management of Change (MOC) processes are used to manage personnel, technology, and process changes at each location. The MOC procedures at each location include formal reviews and approvals by multiple individuals including an environmental, health, and safety professional. MOC records for changes made during the recertification period at the Draslovka plant were sampled and were found to be complete. There were no changes made at the LSI or Carlin operations during the recertification period.

Operating procedures at all locations are also reviewed through a formal review and approval process at least every three years. This review process is used to detect any changes in actual practice and ensure that documented procedures are kept up to date. All procedures reviewed during the audit were found to be current and accurate.

The auditor concluded that appropriate management of change methodologies are being used by all three operations.

Each facility has a formal preventive maintenance (PM) program in place to ensure that process equipment is properly maintained and that instruments are calibrated and/or verified to be accurate. Safety systems designed to protect worker health and the environment such as interlocks, temperature / pressure / level sensors, air monitors, and personal cyanide monitors are included in the PM and calibration programs. Maintenance and calibration records for critical process and safety equipment and instruments were evaluated against internal requirements. Records and were found to be complete and where applicable, internal procedures were consistent with manufacturers' recommendations. Additionally, maintenance personnel were interviewed at each facility and were found to be very knowledgeable and competent.

No cyanide-containing water discharges to the environment occur from any of the facilities. The only facility that is near a water body (Loosahatchie River) is the Draslovka cyanide production operation. Any water that potentially can come in contact with or derive from the cyanide production area is treated on-site and discharged as a permitted discharge to the local water authority. Cyanide-containing water from the LSI operation is stored on-site and sent to Draslovka

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for processing. Cyanide-containing water from the Carlin operation is pumped into a mix tank where it is mixed with cyanide solution that is then brought into product specification. The cyanide solution is then sent as product to mines. Confirmation was made through interview, observation, and a review of records that appropriate water management practices are being used at all three locations.

Procedures exist at all sites for the disposal of cyanide and cyanide-contaminated solids. Procedures include decontamination procedures and hazardous waste handling / management procedures. Qualified waste contractors are used at all three operations to remove hazardous waste from the site.

Draslovka controls the labeling and packing specifications for all products shipped from all three locations. Processes exist within the Draslovka Corporation to ensure that packaging and labeling are appropriate for the jurisdictions through which the load will pass. Multi-language labels are used when the product will be transported through more than one jurisdiction or through jurisdictions requiring multiple languages.

Finding: Is the operation in full compliance, substantial compliance, or non-compliance with Production Practice 1.2?

Full Compliance
 Substantial Compliance
 Non-Compliance

Production Practice 1.3

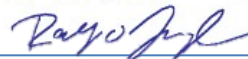
Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.

All three sites have thorough inspection programs to ensure the integrity of process equipment and the prevention of accidental releases of cyanide. A review of records, observations, and results of interviews confirmed that tanks, valves, pipelines, and containments are routinely inspected for their integrity, closure of drains, presence of fluids, and deterioration. Field operators, facility managers, and operators were interviewed and the inspection sheets from field rounds and trench / drain inspections were presented as evidence. Frequencies of inspections were found to be appropriate for the operations. Inspection records indicate the date of inspection, the name of the inspector, and any observed deficiencies. Additionally, American Petroleum Institute (API) inspections are performed at defined frequencies by certified inspectors to check for deterioration of process equipment / piping in contact with cyanide solution.

Operators at all sites showed a high level of awareness regarding the importance of performing thorough inspections. Records from all sites indicated that corrective actions are taken in a timely manner in response to deficiencies noted during preventive maintenance and/or daily inspection rounds. Records showing the resolution to deficiencies were either available on the inspection

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records themselves or in the work order systems.

Draslovka maintains a fleet of rail cars, ISO tanks, and returnable sea containers for specialized routes. The appropriate maintenance and inspection of Draslovka transportation containers and equipment was audited as part of the Draslovka certified supply chains (US/Canada Rail & Barge and Global Ocean – 2022). All three operations also perform inspections of incoming and outgoing transportation equipment before unloading, loading, and after loading to ensure safe transportation and operations. Neither LSI nor Carlin have transportation equipment maintenance responsibilities.

Finding: Is the operation in full compliance, substantial compliance, or non-compliance with Production Practice 1.3?

Full Compliance
 Substantial Compliance
 Non-Compliance

Principle 2 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

Production Practice 2.1

Develop and implement procedures to protect facility personnel from exposure to cyanide.

Worker exposure to cyanide is minimized through the safe operation of the facilities using standard operating procedures (SOPs), engineering controls such as interlocks and alarms, and personal protective equipment (PPE), as defined in SOPs and individual task safe work permits. The minimum PPE requirements are defined in formal procedures at each location. PPE requirements are defined for all types of operations from receipt of material through packaging and shipping. Non-routine and emergency operations at all three sites are performed by trained personnel wearing PPE that is inspected regularly. Emergency procedures are defined in the site emergency response plans (ERPs) and in emergency shut-down procedures.

All three sites have mature detailed procedures that are used for normal and abnormal operating conditions. The buddy system is implemented throughout each facility and PPE requirements are identified for each type of job. Increased PPE requirements are defined for non-routine operations. Personal conduct and safety rules are similar at each site and employees stated that they respect and adhere to the rules. Work permits and/or standard procedures are used

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by each of the operations for maintenance activities to ensure that work practices and PPE are appropriate and safe. Maintenance procedures and standards at each facility clearly state that equipment that may be in contact with cyanide must be cleaned and decontaminated prior to maintenance activities being undertaken.

A formal management of change (MOC) system is used to manage proposed process and operational changes at all three operations. Employees at all levels of the organization are engaged in the MOC process, as appropriate. Any changes that may impact worker safety at any of the three operations are reviewed by appropriate personnel, including environmental, health, and safety professionals, to ensure that a thorough safety review is conducted.

Pre-start up safety reviews (PSSRs) are used prior to putting new or modified equipment into service. Operators and engineers are involved in the MOC process and in the PSSRs. Several samples of action items and MOC reviews from the Draslovka operation were evaluated. All records were complete and were well tracked to closure. Changes to processes or operations at the facilities are reviewed for safety by site managers who consult with Draslovka environmental, health, and safety (EHS) professionals. Depending on the type of change, the EHS professional is also required to approve the MOC. No significant process or facility changes have occurred at the LSI or Carlin operations since the previous Cyanide Code audit in 2019.

Operators and Shift Supervisors / Operations Managers are involved in PPE determinations and in the review of all SOPs at least every three years to ensure that they stay current and appropriate for the operation. Safety Meetings are also used to gain participation. Records and interviews from each facility confirmed that employees are involved in evaluating safety procedures.

Fixed point cyanide detectors and personal cyanide detectors are used by the Draslovka production operation to monitor cyanide concentrations to ensure that they are below 4.7 ppm. Procedures require that field operators have personal monitors and production and warehouse area visitors have at least one person in each group who has a monitor with them.

At the Carlin facility, stationary cyanide detectors and personal cyanide detectors are also used to monitor cyanide concentrations to ensure that they are below 4.7 ppm. The LSI facility uses personnel cyanide detectors to ensure that concentrations are below 4.7 ppm.

All hydrogen cyanide monitoring equipment at each location is calibrated according to manufactures' recommendations. This was confirmed through a review of procedures, owner's manuals, and calibration records for the recertification period at each location.

Draslovka production operations where cyanide exposure may be elevated have undergone occupational health testing and have been found to have acceptable air quality with lower cyanide concentrations than is protective of worker health. Nonetheless, the production area and warehouse are assumed to be areas with the potential for elevated concentrations of cyanide. PPE is therefore required for all production and warehouse areas, and additional PPE is required for non-routine activities or for jobs in which there is a splash hazard. Procedures (e.g., for line breaks) were reviewed and this was confirmed. Occupational health monitoring has also been done at the Carlin and LSI operations. Industrial health studies were reviewed.

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Although there are no specific areas where elevated cyanide concentrations are always present, PPE (including the use of HCN monitors) is required for all warehouse and packaging work areas, and additional PPE is required for wet or dusty tasks.

Practices designed to protect workers at all three locations include the use of the buddy system, radios for uninterrupted communications, regular health assessments, and formally defined change of clothing policies. Eating, drinking, and smoking restrictions existed at all sites. Open flames are prohibited in areas that have flammable materials (such as HCN) and in electrically classified areas. Areas with cyanide have strict access control and posted PPE requirements. Strict adherence to worker safety practices is monitored by management. Employees at each location were interviewed and showed very good awareness and understanding of these practices.

Finding: Is the operation in full compliance, substantial compliance, or non-compliance with Production Practice 2.1?

Full Compliance Substantial Compliance Non-Compliance

Production Practice 2.2

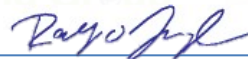
Develop and implement plans and procedures for rapid and effective response to cyanide exposure.

All three locations have detailed emergency plans and procedures available for use during a cyanide exposure incident. Commercially supplied combination shower / low-pressure eye wash stations and non-acidic fire extinguishers are located strategically at each site. Each location also has a program for inspecting the equipment regularly. All three locations have water, oxygen, resuscitators, antidote, and a means of communication readily available. Each site manages its amyl nitrite medicines appropriately to ensure that they do not go out of date. All three locations appropriately maintain their equipment and their medicines to ensure their availability during an emergency. Recent records of equipment inspections were reviewed at all sites. All three locations have an English-speaking workforce. Safety Data Sheets (SDSs) were available at each of the site. Operator awareness was confirmed and SDSs were sampled at each location. Piping at all three locations was appropriately identified and showed the direction of flow. Storage tanks and process tanks were appropriately identified and were marked as having cyanide, process water, or process solution. Since the all the operations are dedicated cyanide operations, this practice was deemed to be acceptable.

Each facility has a decontamination area and a policy. Each facility has a decontamination and change out area for personnel to ensure cyanide does not come into the building or leave the area. Medical professionals are on-site at the Draslovka production operation. The Carlin and LSI operations have personnel who have been trained in first aid, CPR, and in responding to

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cyanide exposure emergencies. In case of a cyanide exposure event requiring the transport of a person to a hospital, the procedures for all sites were to decontaminate the workers, call 911 and wait for ambulance transport. Procedures also define the need to send an amyl nitrite medical kit with the ambulance.

Interviews confirmed that antidote gets sent with the ambulance driver in cases of cyanide exposure. Hospitals near each of the facilities have been contacted and cyanide safety training is provided by Draslovka on a recurring basis, as appropriate. Each site conducts mock emergency drills, holds a drill critique, and evaluates the need for further training or adjustment to the emergency procedures. Records were reviewed and the auditor confirmed that each site is holding an emergency drill each year, and in some cases several times per year. Evaluations were available and were reviewed. Each site has procedures for investigating emergency incidents after the event.

Finding: Is the operation in full compliance, substantial compliance, or non-compliance with Production Practice 2.2?

Full Compliance Substantial Compliance Non-Compliance

Principle 3 | MONITORING

Ensure that process controls are protective of the environment.

Production Practice 3.1

Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

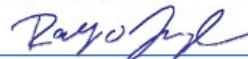
There are no direct or indirect discharges of process water to surface water from any of the facilities. All process water from the Draslovka cyanide operation at the Memphis plant is treated onsite in the site pre-treatment program to ensure that all applicable standards have been met prior to discharging the wastewater to the City of Memphis publicly owned treatment works. Process waters and effluent from the LSI and Carlin facilities are put into storage vessels and either sent to the Memphis Plant for treatment (LSI) or mixed into cyanide solution and sent off as product after appropriate mixing and processing have taken place.

Groundwater monitoring is done at the Draslovka-Memphis site as part of the RCRA (Resource, Conservation, and Recovery Act) Corrective Action Permit. The Draslovka Carlin operation is not required to perform groundwater testing and there have been no release events to suggest that this is necessary. This was accepted by the auditor.

At the Draslovka Memphis Plant, WAD (Weak Acid Dissociable) cyanide levels in groundwater

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ranged from below detection levels to insignificant amounts that were determined to be under defined action levels. The beneficial use of the groundwater under the plant is industrial (non-potable) use. The plant has 10 production wells. The Site's corrective action level for cyanide is 4 mg/liter, per the RCRA Corrective Action Permit. Groundwater sampling is performed at least every two years and shows that the cyanide levels are at least an order of magnitude less than the action level and that there are no increasing trends in concentrations and no concerns that there has been recent environmental impact.

The LSI facility was built on a lined engineered surface, has no cyanide solution, and has never had a spill event. No groundwater sampling is therefore done at this facility. This was found to be acceptable by the auditor.

Air emission data for the Draslovka-Memphis operation reviewed during the audit confirmed that HCN air emissions have been well within permitted levels throughout the recertification period. The air emissions for all operations are calculated levels based on throughput of the facilities. A review of records for the recertification period showed that each facility was well under permitted air emission limits during the recertification period. The frequencies of monitoring and calculations were found to be appropriate for each of the sites.

Finding: Is the operation in full compliance, substantial compliance, or non-compliance with Production Practice 3.1?

Full Compliance Substantial Compliance Non-Compliance

Principle 4 | TRAINING

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

Production Practice 4.1

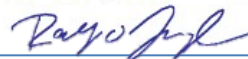
Train employees to operate the facility in a manner that minimizes the potential for cyanide exposures and releases.

Formal training and refresher training is given to employees at each site. Training includes watching a professionally produced training DVD, a review of Standard Operating Procedures, hands-on training sessions, formal testing, and witnessing. Employees are given refresher training at established frequencies. Training is given by highly qualified personnel at each location who have personal experience with safe cyanide management practices.

Training records were available at all three locations to demonstrate adherence to internal requirements. A sample of training records confirmed that training needs were identified for all employees and tasks and that employees were appropriately trained on operational, safety, and

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PPE requirements prior to working with cyanide. The correct use of PPE is one of the many topics included in the training programs. Training effectiveness was judged at each site via testing or skill demonstrations.

On-the-job training using the detailed SOPs is given and records are retained. Operators at LSI and Carlin were interviewed, and they described the training process and observation process that each person must go through prior to working with cyanide.

All sites require extensive training prior to allowing employees to work with cyanide. Records reviewed showed that training occurred immediately upon hire with safety orientation programs and progressed to operating procedures and processes to ensure depth of understanding. Interviews with Operators at each location confirmed this practice.

Refresher training on normal production tasks is provided to employees so that they can continue to work in a safe and environmentally protective manner. The operations follow established U.S. Occupational Health and Safety Administration (OSHA) Process Safety Management (PSM) regulations regarding re-training frequency on process-related operating procedures. Employees are re-trained at least every three years on normal production tasks and are re-tested to confirm continued competence. Cyanide safety training and emergency response training is refreshed every year. Records were reviewed and were found to be acceptable.

At the Draslovka Plant a training curriculum exists for each job. The Training Department maintains training records. The current Training Plan was reviewed and is implemented. It defines training for each position and task. The LSI and Carlin operations are relatively small. Training needs are identified on the New Employee Orientation Checklist and initial training is done on all site SOPs.

All sites use experienced employees, professional trainers, or Supervisors to administer the training. At Draslovka, each trainer must complete a "Field Instructor Module" (Train the Trainer Program). Personnel at all three locations were found to be appropriately qualified and competent for the topics that they taught. Training materials sampled were found to be detailed, clear and accurate.

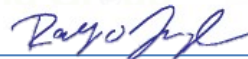
Each employee must go through a "Line Management Assessment" prior to being allowed to work independently at the Draslovka Plant. Testing is done for critical training tasks and topics and operators must demonstrate skill on every task prior to being allowed to work independently. The effectiveness of training is confirmed through testing and periodic observation of on-the-job performance at LSI and Carlin. Skills/Competency demonstration records and testing records for operators and maintenance personnel were sampled at each location and were found to be complete.

Finding: Is the operation in full compliance, substantial compliance, or non-compliance with Production Practice 4.1?

Full Compliance Substantial Compliance Non-Compliance

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Production Practice 4.2

Train employees to respond to cyanide exposures and releases.

Employees at all sites are trained on emergency response procedures, including the response to a cyanide leak or exposure. Refresher training is given at defined frequencies. Records from the recertification period were sufficiently detailed to demonstrate conformance. Interviews confirmed that employees understand and are aware of the emergency response procedures.

Additionally, employees participate in regular emergency drills including “man down” drills which simulate a cyanide exposure event. Drill critiques are conducted after each drill to determine if additional training is required. Detailed training records are retained by each site. Records are maintained for at least as long as the employee is working at the site. A sampling of training records from 2020-2022 showed that training record retention requirements are being fulfilled. Records pertaining to cyanide safety were sufficiently detailed to be found conformant.

Finding: Is the operation in full compliance, substantial compliance, or non-compliance with Production Practice 4.2?

- Full Compliance
 Substantial Compliance
 Non-Compliance

Principle 5 | EMERGENCY RESPONSE

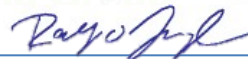
Protect communities and the environment through the development of emergency response strategies and capabilities.

Production Practice 5.1

Prepare detailed emergency response plans for potential cyanide releases.

The Emergency Response Plans from each site were reviewed. They were found to be appropriately detailed and up-to-date. They all have detailed instructions for the use of the antidote, the care of exposure victims, evacuation of site personnel, and for notifications and escalations, depending on the type of emergency. Cyanide exposure procedures were found to be in all emergency plans. All necessary types of emergencies are addressed by the plans and the steps to be taken for on-site and off-site notifications are clear. The roles and responsibilities of the response personnel are well defined. Specific details are included in the emergency plans to address the necessary steps to be taken to mitigate environmental impact and protect worker

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safety. The emergency action plans were found to be appropriate for the organizations and contain sufficient details regarding containment, assessment, mitigation, and the prevention of future releases.

Finding: Is the operation in full compliance, substantial compliance, or non-compliance with Production Practice 5.1?

Full Compliance Substantial Compliance Non-Compliance

Production Practice 5.2

Involve site personnel and stakeholders in the planning process.

Draslovka takes the lead for all three locations regarding engaging stakeholders (including the workforce) and the community in emergency planning. Draslovka participates actively in the Memphis / Shelby County Local Emergency Planning Committee (LEPC) and with local hospitals. Records were available for the recertification period, most recently in 2022, demonstrating active involvement with stakeholders near Memphis and Carlin.

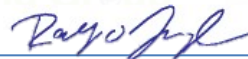
LSI & Carlin ensure that their employees are involved in safety meetings and emergency planning. LSI invites the Fire Department in each year and gives them a tour of the facility to discuss access points, risks, water shut-offs, etc. LSI met with the local fire department regarding emergency planning topics. The Carlin facility is in a remote area. The Draslovka Product Steward engages groups such as hospitals that are local to Carlin. Interviews and a review of community engagement / hospital training sessions confirmed that outreach activities are occurring.

Efforts have been made to outreach to the Memphis and Carlin communities through interactions with the Local Emergency Planning Committee (LEPC) in each location. Records were available for review and interviews confirmed this information. Draslovka has also performed outreach activities for outside responders in the Memphis and Carlin areas during the recertification period as part of its product stewardship program.

Finding: Is the operation in full compliance, substantial compliance, or non-compliance with Production Practice 5.2?

Full Compliance Substantial Compliance Non-Compliance

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Production Practice 5.3

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

Each site clearly designates full responsibility and authority for managing an emergency. Alternate coordinators are also identified in the ERPs. The emergency responders are identified at each site. They receive appropriate training, respirator fit tests, and participate in regular meetings and/or drills. Records of training were sampled and were found to be acceptable. The Draslovka emergency plan is very detailed regarding the titles, responsibilities, and call-out procedures to be used during an emergency. The ERP lists the emergency equipment that needs to be on-site, and the equipment is inspected regularly. The ERPs for the Carlin and LSI facilities were found to be appropriately detailed for the complexity of the operations. Each ERP has identified the emergency equipment necessary and has a checklist for inspecting the emergency and medical equipment.

The emergency response plans for each site clearly designate roles & responsibilities, call-out procedures, and list current phone numbers. Appropriate emergency response equipment was available at each site. Equipment located in appropriate areas was observed during the audit of each location and inspection records from each location were sampled. Each site had at least three emergency response drills, including at least one human exposure drill during the recertification period.

Each site has involved outside responders including fire and EMT responders in their emergency drills in the past and emergency responders are aware of their involvement in emergency response involving cyanide. Although the goal is to include emergency responders in drills each year, this has become increasingly difficult as local responders decline to participate in company drills more and more each year. Nonetheless, records were available for the recertification period that each site has invited local responders to drills and that each site has engaged local emergency responders through the local LEPC groups, local hospitals, and fire departments. Records and interviews demonstrated that sufficient outreach activity had been done in the Memphis and Carlin areas.

Finding: Is the operation in full compliance, substantial compliance, or non-compliance with Production Practice 5.3?

Full Compliance Substantial Compliance Non-Compliance

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Production Practice 5.4

Develop procedures for internal and external emergency notification and reporting.

Each Site Emergency Plan has a detailed list of internal and external stakeholders who need to be notified, as appropriate, depending on the nature of the emergency. The call lists include members of management, Draslovka Control Room (in the case of LSI and Carlin), regulatory agencies, external response providers, and medical facilities. Procedures are in place to ensure that timely communications and notifications are made in the event of an emergency. Each ERP also includes procedures and contact information for notifying potentially affected communities of the incident and/or response measures and for communication with the media.

The Guidelines for Handling Cyanide Emergency Calls section of the Draslovka Mining Solutions Global Emergency Response Plan requires the notification of ICMI of any significant sodium cyanide incident within 24 hours. These operations have not had any cyanide incidents that would require reporting during the recertification period. The notification procedures in each site's emergency procedures, however, require that Draslovka be notified immediately if a cyanide exposure or environmental release occurs. At this point, the Draslovka notification procedures would be used to guide the ICMI reporting process.

Finding: Is the operation in full compliance, substantial compliance, or non-compliance with Production Practice 5.4?

- Full Compliance
 Substantial Compliance
 Non-Compliance

Production Practice 5.5

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

Appendix C of the Draslovka Mining Solutions Global Emergency Response Plan, entitled Sodium Cyanide Spill Requirements, details immediate actions, cleanup and disposal procedures, and first-aid actions. All aspects of recovery and neutralization are addressed.

Extensive descriptions of necessary action steps depending on the incident scenario are clearly outlined in the procedures. A professional remediation firm would be engaged if there were a significant spill.

Information includes details such as what treatment chemicals are used and how the treatment chemicals are to be prepared to the appropriate concentrations. The final concentration that will be allowed in residual soil as evidence that the release has been completely cleaned up would

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be determined in collaboration with State authorities in the event of a release.

Both the Carlin and LSI operations have adopted the Draslovka detailed neutralization and decontamination procedures into their own procedures. Draslovka would be consulted in the event of any remediation needs. A professional remediation firm would be engaged if there were a significant spill.

Each site emergency response procedures prohibit the use of treatment chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide if cyanide spills into surface waters.

Interviews with Draslovka, LSI, and Carlin personnel during this and previous Cyanide Code audits showed a high level of awareness that the use of treatment chemicals is prohibited if cyanide spills into surface waters.

Personnel at each site confirmed that environmental monitoring needs would be determined together with Draslovka subject matter experts and authorities. Past Cyanide Code audits of Draslovka have confirmed that the Cyanides Business within Draslovka has appropriate procedures and skill sets to manage the potential need for environmental monitoring.

Finding: Is the operation in full compliance, substantial compliance, or non-compliance with Production Practice 5.5?

Full Compliance

Substantial Compliance

Non-Compliance

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Production Practice 5.6

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

Emergency response drills are conducted at a minimum of quarterly at Draslovka and annually at LSI and Carlin to evaluate the operation's plans, training, resources, and preparedness for response to cyanide releases and to cyanide exposure of workers. Procedures at each site require the evaluation, and updating, as necessary, of emergency response plans after emergencies and/or drills. Each site reviews the adequacy of its ERP regularly and conducts drills multiple times each recertification period, generally at least each year. Drill critiques are conducted with those who were involved. Action items for revisions to the plan are identified, as necessary, and tracked to closure. Records were reviewed for drills that were held during the recertification period at each location. Records were available to show that action items identified during the critique process were tracked to closure. All three sites were found to be in compliance with Cyanide Code requirements regarding emergency drills and the updating of emergency plans.

Finding: Is the operation in full compliance, substantial compliance, or non-compliance with Production Practice 5.6?

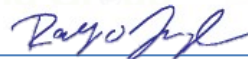
Full Compliance

Substantial Compliance

Non-Compliance

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