ICMI Cyanide Code Gold Mining Recertification Audit

Summary Audit Report

Kinross Gold Corporation, Bald Mountain Mine

Nevada, USA

Submitted to:
The International Cyanide Management Institute
1400 I Street, NW – Suite 550
Washington, DC 20005
USA

2023 Audit Cycle

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Mining Operation: Bald Mountain Mine

Mine Owner: Kinross Gold Corporation

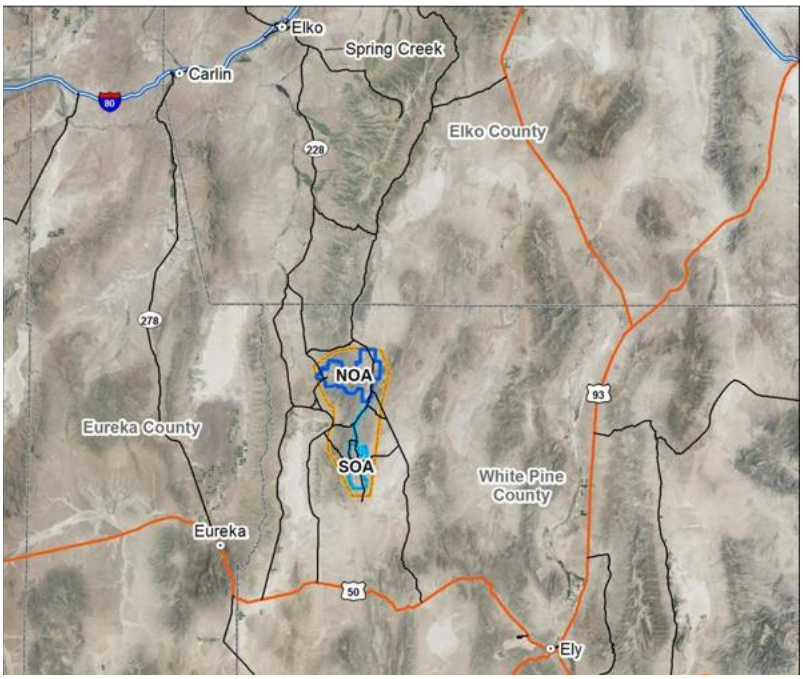
Mine Operator: KG Mining (Bald Mountain), Inc

Name of Responsible Manager: Joseph Kemp, General Manager

Address and Contact Information:
KG Mining (Bald Mountain) Inc
435 Jiggs Highway Unit # 16
Spring Creek NV 89815
United States
joseph.kemp@kinross.com

Location and description of the operation

The Bald Mountain Mine (KG-BM) location is presented in the picture below:



Kinross Gold Corporation acquired the Bald Mountain Mine from Barrick Gold Corporation in January 2016. The mine is located approximately 73 miles or 117 kilometers south of Elko, Nevada. The mine is an open pit, run-of-mine heap leach operation that began large scale production in 1986. The operation is a conventional open pit mine with a capacity of over 200 tons per day. The site operates 24 hours per day, 7 days per week.

The heap leach operations are divided into three areas: Bald, Mooney (North, South and Deep South), and Vantage. The carbon-in-column (CIC) processing plants include: Process Plant 2 (Process #2), Mooney North Plant, Mooney South Plant, and the Vantage Plant. The Vantage Plant utilizes an innovative vertical CIC process. All operations noted here are within the North Operations Area (NOA) except for the Vantage Complex which is in the South Operations Area (SOA).

The Bald Mountain Mine Area includes:

- Process Area #1, which is no longer in operation, has been decommissioned, reclaimed and is ready for release when appropriate.

- Process Area #2 includes leach pads Bald Leach Pad 2 through 5, Pregnant Sump (PS1), Overflow Pond (POF1) and Secondary Pond (P4), two pregnant solution ponds (P5 and P6), Barren Pond (P7), Carbon-in-Column (CIC) process plant and cyanide offloading facility. The leach pads were not being actively leached for several years. Fresh ore was stacked during August 2022 and cyanide was re-introduced to the system. Active leaching is underway.

The Mooney Basin Area includes three process areas:

- North Area Facility, comprising a leach pad (Original Pad and Expansion Pads I, II, and III), two process solution ponds, a storm/event pond, Carbon-in-Column (CIC) process plant and cyanide off-loading facility;
- South Area Facility, comprising Leach Pad 4, a process solution pond, a storm/event pond, a solution collection tank, CIC plant and cyanide off-loading facility.
- Deep South Area Facility, comprising Leach Pads 5 and 6, a process solution pond, two storm/event ponds, and a solution collection tank. Pregnant solution from this facility is piped to the South Area CIC plant for processing.

Originally, the Mooney North and Mooney South Area facilities operated independently. Pregnant and barren solution lines were constructed that connected these facilities, allowing solution to be pumped between them as needed. (Note: When commissioned, the Mooney 8 leach pad will report to the Mooney South plant. A process solution/event pond is located to the east of the new Mooney 8 leach pad.)

The Vantage Complex is in the South Operations Area and consists of:

- A leach pad, a solution collection tank, a process solution pond, a storm/event pond, VCIC (Vertical Carbon in Column) process plant, two cyanide storage tanks, and a cyanide off-loading area.

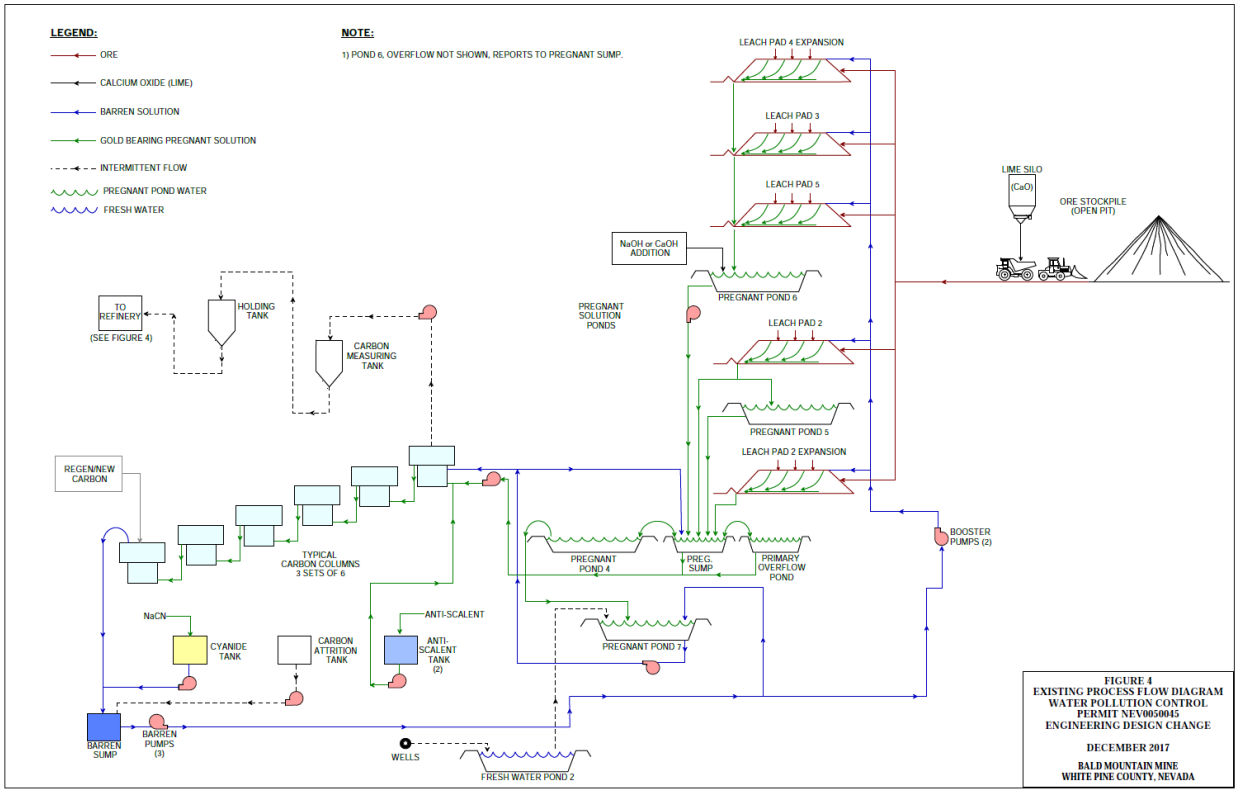
The scope of the recertification audit at KG-BM includes cyanide facilities at Bald Mountain area (Process #2), Mooney Basin area (Mooney North, Mooney South and Deep South area) and the Vantage Complex area. These areas have the following cyanide facilities: Process plant facilities including CIC tanks, barren tanks, cyanide offloading facilities and cyanide storage tanks; heap leach pads, pregnant tanks, process solution ponds and storm/event ponds. There are no treated cyanide water discharges to the environment at KG-BM

Liquid cyanide at 30% concentration is delivered at KG-BM in tanker trucks at four locations: Process #2, Mooney North, Mooney South and Vantage Complex. Cyanide is stored in cyanide tanks before it is distributed for use in the production facilities.

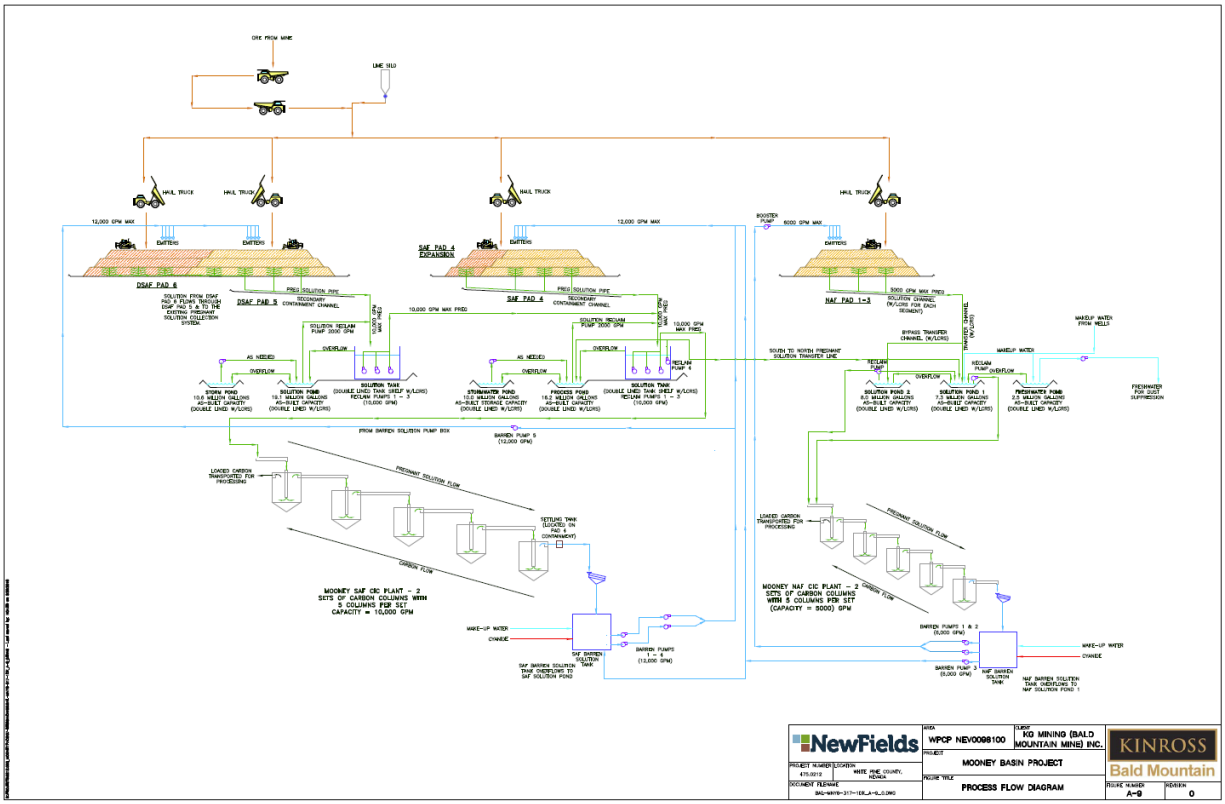
New cyanide facilities constructed since the last recertification audit include Leach pad 3 phase 2 expansion and Leach pad 5 phase 3 expansion, both of them for the Mooney basin project.

The KG- BM process flowsheets for Process #2, Mooney Basin and Vantage Complex are presented below:

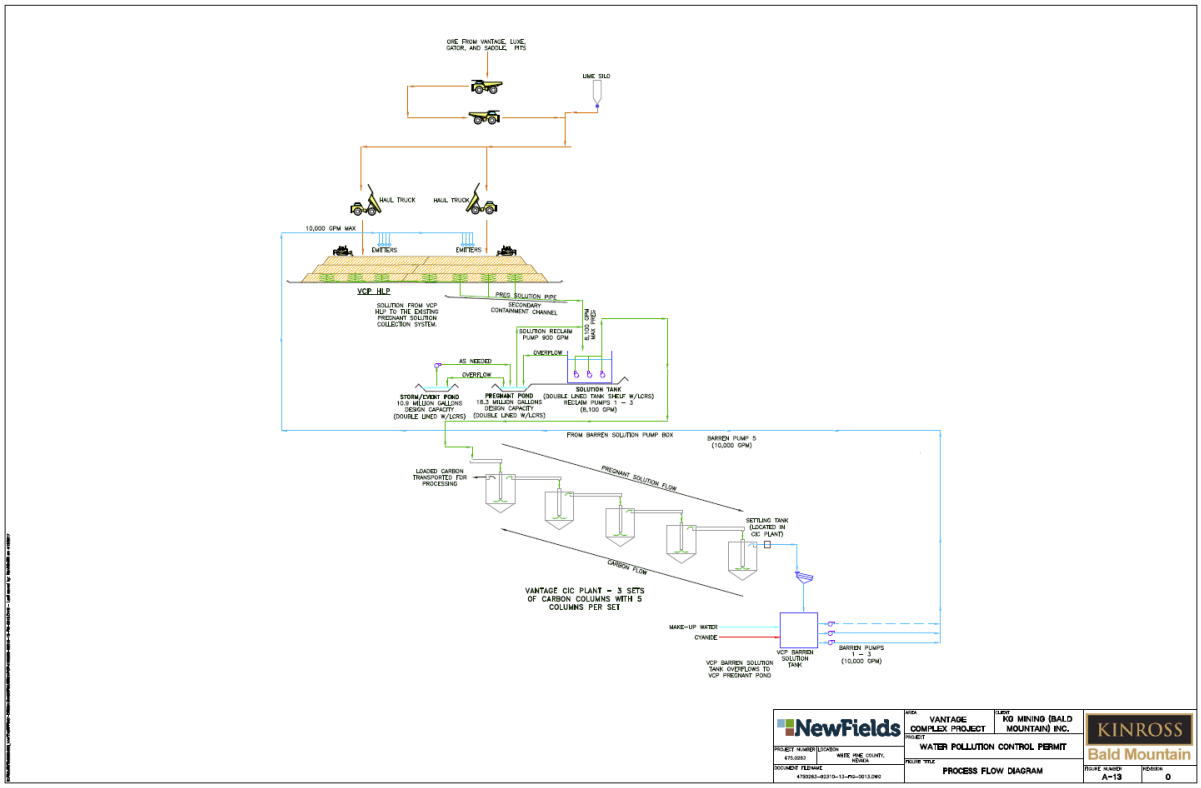
Process #2



Mooney Basin



Vantage Complex



Auditor's Finding

The International Cyanide Management Institute (ICMI) approved Audit Team verified that the Bals Mountain Mine (KG-BM) is in **FULL COMPLIANCE** with ICMI Cyanide Code requirements for Gold Mining operations.

This operation has not experienced any compliance issues during the previous three-year audit cycle.

KG-BM has experienced zero significant cyanide incidents during this 3-year recertification audit cycle.

This operation was determined to be in FULL COMPLIANCE with the International Cyanide Management Code.

Auditor's Attestation

Audit Company:	SmartAccEss Socio Environmental Consulting, LLC
Lead Auditor:	Luis (Tito) Campos E-mail: titocampos@smartaccess.us
Mining Technical Auditor:	Adam House Email:adam.house@patersoncooke.com
Date(s) of Audit:	November 27th – 30th, 2023

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

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

Bald Mountain Mine		March 15th, 2024
Name of Operations	Signature of Lead Auditor	Date

Kinross Gold Corporation - Bald Mountain Mine

Signature of Lead Auditor

March 15th, 2024

SUMMARY AUDIT FINDINGS REPORT

1. PRODUCTION AND PURCHASE: Encourage responsible cyanide manufacturing by purchasing from manufacturers that operate in a safe and environmentally protective manner.

Standard of Practice

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 1.1

Discuss the basis for this Finding/Deficiencies Identified:

KG-BM has a sales agreement to purchase sodium cyanide from Cyanco Company, LLC. The contract stipulates that Cyanco, and any co-producer, maintain certification under the Code. Cyanco's current certification status was verified by reviewing the ICMI website and latest summary audit report. Cyanide was only purchased from Cyanco during the recertification period. Cyanco's most recent ICMI recertification occurred on January 13, 2023.

2. TRANSPORTATION: Protect communities and the environment during cyanide transport.

Standards of Practice

2.1 Require that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training and emergency response.

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 2.1

Discuss the basis for the Finding/Deficiencies Identified:

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

The seller utilizes a single transportation company that is currently certified under the Cyanide Code. The seller utilizes truck transportation by TransWood from the Winnemucca Terminal to KG-BM.

No interim storage takes place between the production facility and the storage tanks at the mine site. Bills of Lading for cyanide deliveries show that the cyanide was produced by Cyanco and transported by TransWood to KG-BM, and TransWood is the sole transporter of cyanide to the site.

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

TransWood was initially certified under the Cyanide Code in 2006, with the most recent certification occurring on November 30, 2022. The records were reviewed on the Cyanide Code website, and TransWood was recertified in Full Compliance.

3. HANDLING AND STORAGE: Protect workers and the environment during cyanide handling and storage.

Standards 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
□ in substantial compliance
□ not in compliance with Standard of Practice 3.1

Discuss the basis for this Finding/Deficiencies Identified:

KG-BM has four active cyanide offloading and storage facilities located at Process#2, Mooney North, Mooney South and Vantage Complex areas that were designed and constructed in accordance with sound and accepted engineering practices. This was verified during the initial certification audit for the KG-BM. No changes or modifications have been made since the initial

audit and subsequent recertification audits. KG-BM does not receive cyanide in solid form. All areas have one cyanide tank, except for Vantage, which has two tanks. For the Vantage Complex, the auditors reviewed the Record of Construction Report from Forte Dynamics dated April 2019 that includes the cyanide offloading and storage area. The report states that the project was “constructed in substantial conformance with the approved Construction Drawings and Technical Specifications”. For Process #2, Mooney North and Mooney South, KG-BM was not able to find drawings and design specifications for cyanide offloading and storage facilities. To meet the requirements of the Code, KG-BM retained a professional engineering firm (AM Engineering) to conduct an evaluation of these facilities and validate that they have been professionally designed and constructed. The field component of the audit confirms that the cyanide tanks at all locations were built on concrete hardstanding maintained in good condition. Cyanide tanks were located within containment concrete berms, which are sized to contain at least 110% volume of the tank. The cyanide tank areas are also subject to daily inspections at shift start to detect any obvious releases or failure in containment.

The offloading and storage facilities for liquid cyanide at Process #2 (one tank) and Vantage Complex (two tanks) are located outside of the process plants and the ones at Mooney North and Mooney South (one tank each) are located within the process plant buildings. In all cases, these facilities are located far away from communities and surface waters. These facilities remain substantially unchanged since the initial certification audit and subsequent recertification audits.

These facilities are not located near any offices or places where workers might congregate. Fixed HCN monitors are installed at each of the cyanide offloading and storage areas. All personnel with access to the offloading and storage facilities, including contractors, receive site specific health and safety training. All these measures minimize the potential for human exposure. Appropriate warning signage is placed at these facilities to alert operators of cyanide presence and hazards associated with it. Although the offloading and storage facilities are not within their own fenced areas, they are located within the fenced and secured areas of the mine where public access is controlled. To minimize human exposure during cyanide offloading, KG-BM has defined 'red zones' for each offloading area. During cyanide offloading, physical barriers are erected to prevent people from entering the red zone. KG-BM is located in an arid area and there is no surface water in the vicinity.

The offloading platforms at all four locations drain inside the secondary containment of the cyanide tanks. Any release from the cyanide tanks will be contained within the secondary containment and pumped back to the system. The Process #2 cyanide tank secondary containment has a sump to collect any leakage and a pump to return it back to the system, while the Mooney North, Mooney South and Vantage cyanide tanks are located adjacent to process solution ponds, which act as a large containment area for each tank. KG-BM offload areas have concrete pads for trucks carrying liquid cyanide. These pads are constructed with cast-in-place reinforced concrete to prevent seepage to the subsurface. They are sloped to the secondary containments of the cyanide tanks to collect any potential spillage during offloading. These areas are inspected daily to detect any deficiencies.

Cyanide storage tanks for liquid cyanide at all four locations have ultrasonic level indicators and high-level alarms installed. These levels are continuously monitored from the control room. Arrangements remain unchanged since the previous recertification audit. The cyanide offload standard operating procedure (SOP or procedure) is designed to prevent overfilling the tanks. The operators verify that the tank levels are low enough to receive the expected delivery. In addition, the cyanide supplier, Cyanco, has remote telemetry monitoring of the cyanide tank levels to track cyanide usage and inventory, allowing them to dispatch cyanide loads when needed. The cyanide delivery driver is required to verify the tank level prior to offloading. No cyanide liquid offload will be allowed if tank levels are greater than 58%, 65%, 72%, and 65% for the Vantage, Mooney North, Money South and Process #2 cyanide tanks, respectively. Tank levels before and after cyanide offloading are documented in Cyanco's bills of lading. There is an audible and visual high-level alarm on each cyanide tank. High level and high-high level alarms are set at 90% and 95%, respectively for Process #2, Mooney North and Mooney South. At Vantage, high level and high-high level alarms are set at 80% and 95%, respectively. If a high-level alarm is triggered, an orange strobe light is illuminated in the offloading area where the driver can see it. For the high-high level there is a strobe and audible alarm. The level indicators in the cyanide tanks are continuously monitored to ensure they are operational. The auditors observed screenshots in the control room showing that the level indicators were functioning correctly. Operators test the operation of the high-level alarms as part of daily facilities inspections.

The reliability and the functionality of the level alarms are maintained through checks of tank level, checks for the offloads, and routine testing and monitoring by process personnel. These sensors are included in the preventive maintenance program of the site.

The cyanide storage tank areas remain substantially unchanged since the initial certification audit and subsequent recertification audits. Cyanide storage tanks are secured to solid, reinforced concrete pedestal-type foundations and are contained within concrete berms with concrete flooring that are an adequate barrier to prevent seepage to the subsurface. The tanks, berms and containment areas are subject to daily inspections at the beginning of each shift at the four areas. The concrete of the secondary containments of the cyanide tanks were observed in good condition. The bermed containment area of the cyanide tanks are sized to contain 110% of the largest tank volume and has been confirmed previously as part of engineering specification checks. The Process #2 cyanide tank secondary containment is equipped with a sump to collect any leakage and a pump to return it back to the system, while the Mooney North, Mooney South and Vantage cyanide tanks are located adjacent to process solution ponds, which act as a large containment area for each tank

The cyanide storage areas for liquid cyanide at all four locations remain substantially unchanged since the initial certification audits and subsequent recertification audits. The liquid cyanide storage areas at Process #2 and Vantage are located outside of the plant buildings, and inside the plant buildings at Mooney North and Mooney South. All cyanide tanks are vented on top.

Cyanide tanks are insulated, and heat traced, and there are fixed HCN monitors and windsocks to indicate wind direction. Build-up of hydrogen cyanide gas is unlikely to occur. The Mooney North and South plants are equipped with adequate ventilation to prevent the build-up of hydrogen cyanide gas. The offloading and liquid cyanide storage facilities do not have their own fenced areas, however, they are located within the fenced and secured areas of the mine where public access is controlled. There is warning signage indicating that only authorized personnel are allowed in the area. In addition, all the valves associated with the cyanide storage tanks are locked. Cyanide is stored separately from incompatible materials such as acids, strong oxidizers and explosives, and apart from foods, with appropriate barriers that will prevent mixing. Secondary containments are designed to prevent cyanide spills from mixing with incompatible materials, as verified by following potential flow paths. No storage of other materials was observed during the field inspection.

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

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Discuss the basis for this Finding/Deficiencies Identified:

KG-BM only uses liquid cyanide delivered in tanker trucks; no drums or wooden crates are involved. KG-BM Standard Operating Procedure (SOP or procedure) “Receiving Cyanide Shipment / Transwood Emergency Procedures” specifies that KG-BM personnel shall monitor the connection / disconnection of the offloading process. The SOP requires the driver to monitor and control the entire offload operation. The SOP also details responses to any leaks or spillage. At the end of the offload, the driver is required to rinse connections and couplings after offload is completed. The SOP also addresses identification and response for the cleanup or recovery of any leakage. Any spills or leaks related to a cyanide offload and onto the pads are directed inside the cyanide tanks secondary containments and returned into the system.

KG-BM has SOP “Receiving Cyanide Shipment / Transwood Emergency Procedures” that outlines the requirements for inspection, observation and offloading of liquid cyanide; as well as the operation and function of valves, pumps and various interlocks within the cyanide offloading process. The SOP also addresses the routine maintenance of the hoses, valves and couplings used for offloading liquid cyanide. There is a checklist that is completed using the iAuditor software that includes requirements to check emergency showers and eye wash stations prior to cyanide offloading. In addition, the SOP describes safe practices to complete the offload. Both the transporter and operator must confirm that the storage tank has sufficient capacity for the offload. The bills of lading document the pH of the liquid cyanide and tank levels prior and

after offloading. The operators sign off the form to authorize the offload. The operators have radios for communication with the control rooms in the event of an emergency. KG-BM operators are familiar with the Cyanco/TransWood delivery and emergency shut off procedures, which are also included in the SOP. SOP "Receiving Cyanide Shipment / Transwood Emergency Procedures" addresses inspection, identification and response for the cleanup or recovery of any leakage. No spills related to cyanide offloading were reported during this recertification cycle. KG-BM SOP "Receiving Cyanide Shipment / Transwood Emergency Procedures" requires operators to use the appropriate PPE during offloading activities. These include rubber boots, face shield and/or goggles, rubber gloves, rubber or neoprene suit, approved respirator, and hardhat. The SOP also specifies that KG-BM personnel shall monitor the connection / disconnection of the offloading process that is conducted by the Cyanco/TransWood driver. Offloading operations and cyanide alarms are also monitored remotely from the control room. The liquid cyanide already comes with a pink colorant dye. A cyanide offloading event was observed during the audit. The review indicated that KG-BM has appropriate SOPs and practices to handle and offload cyanide solutions in a safe manner.

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

Standards of Practice

4.1 Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures.

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 4.1

Discuss the basis for the Finding/Deficiencies Identified:

The scope of the recertification audit at KG-BM includes cyanide facilities at Bald Mountain area (Process #2), Mooney Basin area (Mooney North, Mooney South and Deep South area) and the Vantage Complex area. These areas have the following cyanide facilities: Process plant facilities including CIC tanks, barren tanks, cyanide offloading facilities and cyanide storage tanks; heap leach pads, pregnant tanks, process solution ponds and storm/event ponds. There are no treated cyanide water discharges to the environment at KG-BM.

The Water Pollution Control Permits (WPCP) for KG-BM describe operating requirements. These permits authorized KG-BM to construct, operate, and close the operations in accordance with the requirements and conditions of the permit, which includes specific requirements for the

cyanide facilities. These requirements and conditions are based on information provided by the operations to the Nevada Department of Environmental Protection (NDEP), describing the facilities and operating methods. Additionally, there are operating plans and SOPs for the safe operation of cyanide facilities including offloading, storage facilities, process plants, heap leach operations, solution ponds and all cyanide-related activities. All SOPs include a description of the tasks to be performed, PPE requirements and responsibilities. Procedures are stored in the PolicyTech platform and are reviewed and updated every year or when there are significant changes in the tasks. Procedures were reviewed and found to be sufficiently detailed to enable safe operation.

KG-BM has plans and permits documentation in place that include critical assumptions and parameters for the safe operation of cyanide facilities. The Fluid Management Plans for the WPCP permits for each of the four areas (Process #2, Mooney North, Mooney South and Vantage) describe regulatory requirements, such as regular pumping and monitoring of the leak detection and collection systems, groundwater monitoring, and a minimum 2 feet of freeboard for the process ponds. The WPCP application document also includes the design storm event for process solution pond and impoundments. This design storm event is also included in the operations water balance. KG-BM does not have a specific limit for WAD (Weak Acid Dissociable) Cyanide concentrations for open waters in solution ponds, as the resulting cyanide concentration in the ponds depends on production and recovery needs; however, the operation has controls in place such as birdballs to prevent access of wildlife to these waters. KG-BM does not discharge any solution containing cyanide to the environment, including surface water.

KG-BM has developed and implemented standard operating procedures (SOPs) for cyanide related tasks, which describe the standard practices necessary for the safe and environmentally sound operation of cyanide facilities. The operation has identified equipment, personnel, and procedures for cyanide offloading as well as for leaching and processing facilities, and all associated piping and pumps as having contact with cyanide. The Fluid Management Plans for the three WPCP permits provide monitoring schedules and freeboard requirements for normal operating conditions. The SOP “Processing Pond Level Management” includes water management procedures to retain storage capacity in the solution ponds during operations.

KG-BM has implemented an inspection program with frequencies that vary from daily and weekly for all four areas including the leach pads, ponds, and process plants. Inspections are conducted by process personnel following requirements specified in permit documents. The inspections are documented using the iAuditor software that includes the name of the inspector, date, area inspected, identified deficiencies and a section to include corrective action plans. Identified deficiencies are noted and corrected or reported to supervision for corrective action. Deficiency notifications are sent to maintenance planners where they schedule corrective maintenance via work orders. The inspection program is sufficient to assure and document that the systems are operating within design parameters. Workplace inspections conducted every shift by operators at the process plants include safety equipment (including showers, eyewash stations, extinguishers, first aid kits), secondary containments, tanks, alarms, HCN monitors, process

equipment, piping, cyanide offloading areas, generators, among others. Workplace inspections for heap leach facilities are also conducted every shift including pipes, fittings, ponding, presence of wildlife, among others. Solution ponds, solution channels and Leak Collection Recovery Systems (LCRS) are inspected on a weekly basis including fencing, birdballs coverage, diversion channels, dikes of solution ponds, and flows pumped between the liners of solution ponds. The auditors sampled inspection records for the last 3 years and found them to be complete.

Kinross has a corporate-wide procedure Management of Change (MoC) that includes the identification and review of the proposed changes; identification of relevant stakeholders for the project, analysis, and evaluation of the changes by a multidisciplinary team including health, safety and environmental aspects; sign off by all areas that participated in the evaluation, approval, and implementation of the change with action plans. The auditors reviewed examples of MoC related to cyanide management, along with others not related to cyanide, and identified that the MoC process is being used.

The three Fluid Management System Operating Plans for KG-BM describe contingency actions for upset operating conditions in leach pads and ponds that could exceed the design storage capacity. These actions include ceasing addition of make-up water to the heap leach circuit, ceasing cyanide addition to the barren solution recycle to the heap, increasing flow rate to the heap to enhance evaporation in the summer or to make ice in winter, increasing solution evaporation by substituting rainbird-type sprinklers for drip emitters, and spraying unused portions of the heap to reduce solution volumes through evaporation and retention in the heap. In addition, KG-BM has SOP “Processing Pond Level Management” that includes water management procedures to retain storage capacity in the solution ponds during operations. KG-BM has plans and procedures for the safe operation of cyanide facilities. These documents include actions to be taken to regain control of the operation in case of upset conditions identified during cyanide facilities monitoring and inspections. The Tentative Plans of Permanent Closure (TPPC) for Process #2, Mooney Basin and Vantage Complex include a temporary closure plan for both planned and unplanned scenarios. Planned temporary closure scenarios can occur due to mechanical or technical difficulties, unfavorable economic conditions, litigation, or other unforeseen events. Unplanned closure could occur due to unforeseen weather events, a failure in a major system component, or a process failure which causes the fluid management system or a portion of the system to shut down.

The cyanide tanks and barren tanks at the four areas (Process #2, Mooney North, Mooney South and Vantage) are inspected every shift. Inspection forms in iAuditor include specific items related to inspection of structural integrity of the tanks and signs of corrosion and leakage. Nondestructive tests (NDT) are conducted annually for tanks holding cyanide solutions including cyanide storage tanks and barren tanks. These nondestructive tests are included in JD Edwards as part of the preventive maintenance program. Test results are compared with minimum acceptable values to define potential corrective actions. Secondary containments configuration remains substantially unchanged from the previous recertification audits. None of the containment areas has any drains to the adjacent land surface. During the field visit, the

secondary containments were observed to be generally free of any fluids or materials stored within them. Inspection forms in iAuditor include items to check for conditions of secondary containments (integrity, presence of fluids, available capacity). Leach pad areas and process solution ponds are inspected daily. The LCRS from the solution ponds are inspected weekly and monitored for flow. This water is not analyzed for cyanide concentration. Flows pumped by the LCRS from 5 solution ponds are exceeding permit conditions and will need to be repaired. KG-BM has developed a plan and has budget approval to initiate repairs of these ponds in Q2 2024. Pipelines, pumps and valves at the process areas and leach pads are inspected every shift by process operators. Inspection forms in iAuditor include items related to deterioration and leakage of pipes, pumps, and valves. Leach pads and solution ponds are inspected daily for critical aspects including available freeboard. Historical freeboard in solution ponds for the last 3 years at all four areas were reviewed and verified that they were generally managed according to their design criteria. In addition, diversion channels around leach pads and ponds are inspected weekly as part of the LCRS inspections. The auditors conducted a field inspection during the site visit and verified the condition of tanks, secondary containments, pipelines, pumps, valves, water diversions, heap leach facilities and solution ponds freeboard. These inspections also included cyanide offloading and storage facilities. The auditors reviewed inspections records and verified that inspections to cyanide facilities are conducted in a consistent manner. It is the professional opinion of the auditors that the inspection program of cyanide facilities, including offloading and storage activities, and the frequency of inspections are sufficient to assure and document that the operation is safe and functioning within design parameters. The auditors reviewed inspections records and verified that inspections are conducted in a consistent manner.

Records of inspections are retained and were reviewed by the auditors. The inspections are documented and include the date of the inspection, the name of the inspector and observed deficiencies. Inspection forms are reviewed by the supervisor to ensure good quality of inspections. The inspection program also includes cyanide offloading and storage facilities. Corrective actions identified that are related to maintenance of equipment at processing facilities are managed by the Maintenance area. These corrective actions are managed using the JD Edwards maintenance software, where work orders are tracked, prioritized, planned and closed. The auditors reviewed examples of items identified during inspections and records of the implementation of the corrective actions until they were closed. All other corrective actions not related to maintenance of equipment that are identified through inspections conducted by Process personnel are actioned and followed up in the iAuditor system until closure.

The Maintenance area has a preventive maintenance program for pumps, pipelines, valves, flow meters, gauges, sump pumps, filters, HCN sensors, tanks and cyanide facilities in general. The preventive maintenance program is used to perform necessary maintenance and inspect the integrity of process equipment, piping and tanks, according to a maintenance program and every time it is needed to keep equipment and facilities working properly. SOP “Process Maintenance Cyanide Decontamination” is used to ensure that any equipment that contains cyanide is properly decontaminated prior to performing maintenance and that maintenance personnel wear necessary personal protective equipment. KG-BM uses the JD Edwards maintenance software

for identifying, assigning responsibility, scheduling, and tracking the completion of the preventive maintenance activities. Preventive maintenance plans are generated automatically with varied schedules (daily, weekly, monthly, quarterly, and annual). Work orders generated from inspection forms are entered in the system, including assigned priority.

KG-BM receives electricity from the public grid to run its operations. Necessary power for the leach pad and plant facilities ranges between 4 to 5 Megawatts (MW). As backup power, KG-BM has five generators across all the areas to maintain the water balance: Vantage (2.6 MW), Deep South (1.25 MW), Mooney South (1.75 MW), Mooney North (1.5 MW) and Process #2 (0.5 MW). The generators have the capacity to run all equipment at each area, except for Process #2, that only have the capacity to run the barren and pregnant pumps to maintain the water balance in the ponds. In the event of a power outage, these generators would start up automatically to run pumping equipment. KG-BM has SOPs to start up the generators in case of power outage. The SOPs mention that the plant backup generators must be checked periodically to ensure they are in ready condition in case of a power loss. KG-BM provided examples of preventive maintenance records for the power generators for the last three years. A review of these records confirmed that the generators are checked weekly for fuel level, lighting, heating and are also start-tested. This inspection would trigger a corrective maintenance work order if required.

4.2 Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 4.2

Discuss the basis for this Finding/Deficiencies Identified:

Not applicable to KG-BM. This Standard of Practice solely applies to milling operations.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 4.3

Discuss the basis for the Finding/Deficiencies Identified:

KG-BM operates its process facilities as a closed system with zero discharge of solutions. Any precipitation falling onto the leach pads is retained within the solution management system with

no discharge or runoff. In the event of a pump or power failure, the excess ponds are sized to store draindown volume from the leach pads, and backup generators are available to provide power to the heap leach pumping operations. Until 2021, KG-BM used the probabilistic simulation software Goldsim to run the water balance but suspended its use that year. Instead, an Excel spreadsheet is currently being used to run the water balance. The water balance model was reviewed by an external expert to confirm the assumptions used in the Excel water balance model and validate that the outputs of the water balance can guarantee avoiding potential overflows. A technical memorandum developed by Forte Dynamics, dated January 25th, 2024, titled “Kinross Gold – Bald Mountain Water Balance Audit Report” concluded that the water balance model in Excel is robust enough to provide the outcomes required by the Code. KG-BM has a document titled “KGBM Water Balance Model” that describes how the water balance works, its assumptions, and the calibration process and frequency. The Excel spreadsheet used to run the water balance includes the following factors: solution application rates; precipitation, evaporation; and freshwater input. Potential power outages are not included in the water balance as the operation has backup power generators that are located on each of the four production areas.

The Excel spreadsheet used to run the water balance includes the solution rates applied to the leach pads, which is 0.0025 gallons/minute/square feet. It also considers as an input the 100-year, 24-hour storm event, which is estimated at 2.91 inches using data from the National Oceanic Atmosphere Association (NOAA) weather service. This value is of critical importance to ensure that overtopping of solution ponds will not occur during the operational life of the facilities, and that sufficient freeboard in the ponds is maintained at all times according to design parameters specified in the Fluid Management Plans for the WPCP permits (2 feet). KG-BM considers the quality of existing precipitation and evaporation data in representing actual site conditions. There are three weather stations at KG-BM, one at each of the following locations: Process #2, Mooney Basin and Vantage areas. These weather stations are calibrated every quarter to ensure collection of good quality data. The information from these weather stations is used as an input in the Excel spreadsheet that is used to run the water balance. Precipitation data is collected at the weather stations, while evaporation data is calculated using other weather parameters such as temperature and relative humidity. The heap leach facilities at KG-BM have a surface water control system for controlling and safely directing runoff generated from upgradient watersheds around the heap leach and ponds. As such, upstream precipitation is not considered in the model. The water balance does not consider the effects of potential freezing and thawing conditions on the accumulation of precipitation within the facility and any upgradient watershed as they are considered negligible. The water balance considers only evaporation losses. The leach pads at KG-BM have synthetic liners and do not have underdrain systems to collect seepage from the heap leach pad or solution ponds. There are no discharges to surface water at KG-BM. The water balance model can simulate a power outage by zeroing out selected pumping rates for a given period, such as 24 hours. KG-BM has backup generators that automatically start up in case of a power outage that could put in risk the water balance of the operation, however, such scenario is very unlikely and could only occur in case both the primary source of power (public grid) and the emergency power generators were not operational. KG-

BM does not discharge any solution containing cyanide to the environment, including surface water. As such, this component is not considered in the water balance.

SOP “Processing Pond Level Management” includes maximum operating levels for the solution and events ponds and how to operate them to retain the designed storage capacity in these facilities. These pond levels are monitored daily. This information is considered in the Excel spreadsheet that is used to run the water balance. These volumes consider a freeboard of 2 feet. KG-BM conducts frequent inspections and monitoring activities of the heap leach facilities to ensure these facilities are operated according to the design criteria. Process operators conduct daily inspections of the leach pads and solution ponds. The auditors reviewed inspections records and verified that the heap leach facilities at the four areas are inspected in a consistent manner. The auditors reviewed monitoring data for the recertification period to verify that the solution volumes in the process ponds were managed at all times according to the design criteria. According to the Excel water balance and the pond levels, there has been enough capacity in the solution ponds to contain the 100-year, 24-hour storm event. The technical memorandum developed by Forte Dynamics, dated January 25th, 2024, titled “Kinross Gold – Bald Mountain Water Balance Audit Report” confirmed that for this recertification period KG-BM has maintained enough capacity to contain the 100-year, 24-hour storm event, and that current ponds capacity is sufficient for future years to prevent overtopping of the ponds.

KG-BM incorporates inspection and monitoring activities into their procedures to implement the water balance and prevent the overtopping of the process ponds. Records of inspection forms for the recertification period were reviewed and found to be complete. The heap leach facilities including solution ponds levels, are monitored daily. Solution ponds are equipped with level indicators that are monitored by operators and the data is entered into data logs that are then used to compare with design parameters and freeboard requirements.

There are three weather stations across all four areas that collect meteorological data such as precipitation, temperature and wind speed and direction. The information from these weather stations is used as an input in the Excel spreadsheet used to run the water balance. The auditors reviewed on-site meteorological monitoring data and found them to be complete. KG-BM measures precipitation daily and the data is uploaded into the water balance model. The water balance is updated once a year by using real precipitation data and ore placed in leach pads. The water balance was last updated in 2022. KG-BM evaluates the need to revise operating practices based on the results from the water balance model updates.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 4.4

Discuss the basis for the Finding/Deficiencies Identified:

The only cyanide facilities with open waters that could exceed WAD cyanide above 50 mg/l are the solution ponds. There are a total of 16 solution ponds across the whole site (Process #2, Mooney North, Mooney South, Mooney Deep South, and Vantage). WAD cyanide concentrations in solution ponds at KG-BM are variable and can have values above 50 mg/l. KG-BM has controls in place such as birdballs to prevent access of wildlife to these waters. The site has implemented the following measures to restrict wildlife and livestock access to open waters: Eight-foot high combination chain link fence around the process ponds; birdballs on the surface of ponds; and propane cannons (at Mooney Deep South area). In the case of leach pads, the site has implemented the following controls: Eight-foot field fence around the perimeters of the leach pads; propane cannons, deflectors and netting for areas of active leaching; solution from the heap leach pads is either contained within closed piping or is in ditches covered with gravel.

WAD cyanide concentrations in solution ponds at KG-BM are variable and can have values above 50 mg/l. These WAD cyanide concentrations in the ponds are dependent on production and gold recovery needs. KG-BM has controls in place such as birdballs to prevent access of wildlife to these waters, along with other controls such as perimetral fences around ponds and the use of propane cannons. The WAD cyanide concentration of the solution applied at the heap leach pads is above 50 mg/l (values in the order of 100 mg/l).

KG-BM has implemented controls to restrict access of wildlife to open waters including perimeter fences, birdballs and daily inspections to leach pads and ponds conducted by process personnel. Regardless of that, KG-BM has reported 3 wildlife mortalities for the recertification period: Two wild horses at Vantage in Q3 2021, and one elk at Mooney South in Q2 2022. As a result of these incidents, KG-BM has installed fences around the perimeters of all leach pads at Mooney North, Mooney South and Vantage. KG-BM has Industrial Artificial Pond permits with the Nevada Department of Wildlife (NDOW), where they are required to have controls in place in open waters to prevent any cyanide mortality, conduct wildlife monitoring, and report all wildlife mortalities. KG-BM sends quarterly wildlife reports to NDOW that includes a section to indicate if the mortalities are related to cyanide. If an animal mortality is found, KG-BM holds the carcass until authorized by NDOW to dispose of it. If there are concerns whether the mortality is related to cyanide, NDOW has the authority to require testing. The auditors reviewed the wildlife mortalities register and there were 3 mortalities related to cyanide for the recertification period.

SOP “Ponding Mitigation” requires daily inspections to check for ponding and the required steps to handle surface ponding including stopping leaching in the area and, if necessary, proceed with measures to aid drainage and improve infiltration, cover the ponded area with netting to prevent access by wildlife, and use of bird canons. There are 4 active leach pads during the recertification period (Process #2, Mooney North, Mooney South, and Vantage). Leach solution is applied with drip emitters on the top surface and on the side slopes, which limits the possibility of overspray of leach solutions off the leach pad liner on the heap side slopes. The operators

conduct daily inspections where ponding, if present, would be noted and mitigated. Leach pad inspection form includes actions to be taken in case of ponding such as adjust dripper locations, place netting or gravel, among others. A follow-up inspection is also conducted to ensure the ponding condition has been corrected.

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

Discuss the basis for the Finding/Deficiencies Identified:

Not applicable to KG-BM, as it does not have direct discharges of any solution containing cyanide to surface water. The site operates with zero discharge of process solutions. The mine is located in an arid climate with no natural surface water bodies on the properties or within close proximity. There are no indirect discharges to surface water. The leach pads and ponds do not have underdrains systems below them and there are no natural surface water bodies on the properties or within close proximity.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 4.6

Discuss the basis for the Finding/Deficiencies Identified:

Main facilities that may contribute to seepage to groundwater are the heap leach facilities and solution ponds. KG-BM employs a number of specific water management and control measures to protect beneficial use of groundwater. These facilities remain substantially unchanged since the initial certification audits and subsequent recertification audits. KG-BM has implemented the following measures to protect groundwater below and downgradient of the operation: Geomembrane liners under all cyanide heap leach facilities; double geomembrane liners with leak detection and collection systems for all process ponds; single geomembrane liners for events ponds (used only in emergency or upset conditions); geomembrane-lined secondary containment ditches or pipe-in-pipe containment for all cyanide-bearing pipelines; all cyanide tanks and pipes have been designed with secondary containments such as concrete or lined containments. KG-BM conducts regular inspections of the leak collection systems to ensure that

the facilities are functioning as designed and protective of the environment. Additionally, KG-BM has installed monitoring wells immediately downgradient of the cyanide process facilities to monitor groundwater.

KG-BM continued monitoring groundwater wells around the process area in accordance with its WPCP. KG-BM is required to conduct groundwater monitoring at one monitoring well down gradient of the Process #2 operations (BMW7), 7 monitoring wells located in the vicinity of the Mooney Basin operations (MMW1, MMW2B, MMW5, MMW4R, MMW14, MMW17, and PC1034), and 2 monitoring wells for the Vantage Complex (VMW1, VMW2). Quarterly monitoring of all these wells for the recertification period were generally below the detection limit (0.005 mg/L) for WAD cyanide in groundwater. The beneficial use for groundwater downgradient of KG-BM, as designated by the State of Nevada, is agricultural and livestock use. The standard is 0.2 mg/l WAD cyanide. KG-BM has not caused cyanide concentrations in groundwater to rise above levels protective of beneficial use.

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

Discuss the basis for the Finding/Deficiencies Identified:

KG-BM has implemented spill prevention and containment measures for processing facilities. These facilities remain unchanged since the initial certification audit and the previous recertification audits. All tanks containing cyanide have secondary containments including the cyanide storage tanks (one at Process #2, one at Mooney North, one at Mooney South, and two at Vantage), 4 barren tanks and CIC tanks. The containments are constructed of cast-in-place reinforced concrete. There are automated pumps within the containments to pump collected solutions back into the process circuit. Automated sump pumps are included in the preventive maintenance program. The Process #2 cyanide tank secondary containment has a sump to collect any leakage and a pump to return it back to the system, while the Mooney North, Mooney South and Vantage cyanide tanks are located adjacent to process solution ponds, which act as a large containment area for each tank. The secondary containment systems are inspected daily as part of the process facilities inspection system using the iAuditor software. There are ultrasonic level indicators installed on all tanks that are continuously monitored from the control rooms. The auditors observed that the concrete containment systems were generally in good condition at the time of the audit.

As stated in the last recertification audit report, secondary containments for cyanide offloading, storage, and process tanks are sized to hold a volume of at least 110% of the largest tank within the containment and piping draining back to the tank with additional capacity for the design storm

event. The secondary containment volume calculations were reviewed and deemed as sufficient. Furthermore, those containments have remained unchanged since last recertification audit. The Mooney North, Mooney South and Vantage plants are located next to process solution ponds, providing additional containment capacity. The entire process areas are contained within concrete pads surrounded by curbs and walls, providing a competent barrier to seepage. The concrete floor is sloped to drain to concrete trench drains, where any spills or rainwater will be pumped back to the process, or they are equipped with plastic lined channels that flows by gravity to adjacent process ponds. The cyanide offloading platforms at all four locations drain inside the secondary containment of the cyanide tanks. Any release from the cyanide tanks will be contained within the secondary containment and pumped back to the system. The Process #2 cyanide tank secondary containment has a sump to collect any leakage and a pump to return it back to the system, while the Mooney North, Mooney South and Vantage cyanide tanks are located adjacent to process solution ponds, which act as a large containment area for each tank. During the field visit, the secondary containments were observed to be generally free of any fluids or materials stored within them.

KG-BM has several procedures and plans in place which are implemented to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in a secondary containment. All tanks and cyanide facilities are located inside concrete secondary containment systems with dedicated pumps that remove solutions and return them to the process circuit. The pumps have automatic level sensors to keep the secondary containments free of any fluids. The automatic pumps are included in the preventive maintenance program. There is no discharge of cyanide-containing water from the secondary containment areas as the secondary containments are not designed to discharge into the environment. As stated in the Code, no specific written procedures are necessary as the containment systems have sumps and dedicated pumps and piping to return solutions to the production process.

KG-BM has spill prevention and containment measures for cyanide process solution pipelines. These facilities remain largely unchanged since the initial certification audit and the previous recertification audits. KG-BM has constructed all pipelines with spill prevention and containment measures to collect leaks and prevent releases. Pipelines have been constructed either as pipe-in-pipe configuration or within lined ditches. There are no buried pipelines in the plant areas. Where necessary, pipe-in-pipe features were implemented to cross pipelines below roads. Pipelines connecting the leach pads, ponds and process plants are lined with HDPE through all its extension to convey any leaks to larger containment areas. Cyanide pipelines at the process plants and leach pads are inspected daily using an inspection checklist in iAuditor software and are also included in the preventive maintenance program.

As mentioned in previous audit reports, no cyanide pipelines present a direct risk to surface water. There are no perennial or ephemeral surface water bodies in the vicinity of KG-BM requiring special protection for pipelines. All outside pipelines have secondary containment: pipe-in-pipe, concrete ditch or enclosure, or pipe within a lined channel. Pipelines to and from the

heap leach facilities remain unchanged and retain the same safety features identified in previous audits. All facilities are far away from areas that may require special protection.

As stated in previous audit reports, all cyanide storage and process tanks are constructed of coated carbon steel placed on concrete foundations. Liquid cyanide pipelines are constructed of carbon steel while cyanide solution pipelines are constructed of carbon steel or HDPE. All these materials are compatible with high pH cyanide solutions. All tanks and pipes were well supported and in good condition.

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

Describe the basis for the Finding/Deficiencies Identified:

Quality assurance and quality control (QA/QC) programs have been implemented during the construction of cyanide facilities at KG-BM, including Process #2, Mooney North, Mooney South and Vantage. During previous recertification audits, the site presented files with QA/QC reports for the facilities constructed before the last recertification audit in 2020, which was found in compliance with the Code requirements. However, the complete records of the QA/QC reports were not available for review by the auditors during this recertification audit. Site personnel interviewed during the audit indicated that QA/QC programs were followed during construction of the facilities, however, there were no records available for review. The only QA/QC record available for facilities constructed before 2020 is the “Record of Construction report West Pad Vantage Complex project”, developed by Newfields consultants, dated August 2019, and the “Record of construction for Vantage project” developed by Forte Dynamics dated October 2019. No additional QA/QC records were available during the audit for the rest of the cyanide facilities constructed before 2020 including the other 3 process plants, the solution ponds, and heap leach pads at Process #2, Mooney North, Mooney South, and Vantage East area. In order to be in compliance with the requirements of the Code, KG-BM has provided an alternate demonstration of QA/QC programs, which is discussed below. KG-BM has implemented QA/QC programs for new cyanide facilities constructed during the recertification period. New facilities constructed since the initial certification audit include Leach pad 3 phase 2 expansion for Mooney basin project which was commissioned in late 2022, and Leach pad 5 phase 3 expansion for Mooney basin project, which was commissioned in Q1 2023. Stage 8 Leach pad at Mooney South is under construction and was not in operation at the time of the audit, and as such, it is outside the scope of this audit.

For new facilities constructed during the recertification period, QA/QC programs addressed the suitability of materials and adequacy of soil compaction for earthworks including fabrication material certificates and technical specifications for HDPE drainage products, geo-synthetic, liners, piping, electrical and mechanical instrumentation. QA/QC reports also include non-destructive test logs, destructive test logs, vacuum tests, pre-weld tests, destructive sample tests, and repair controls.

The only QA/QC records available for facilities constructed before 2020 is the “Record of Construction report West Pad Vantage Complex project”, developed by Newfields consultants, dated August 2019, and the “Record of construction for Vantage project” developed by Forte Dynamics dated October 2019.

Qualified engineering companies performed the QA/QC inspections and reviews during construction of the cyanide facilities at KG-BM and prepared the final construction reports certifying that the facilities were constructed in accordance with the design drawings and technical specifications. The auditors reviewed the records of construction reports that were available, including as-built drawings. As-built drawings were properly stamped by a qualified engineer. QA/QC reports are signed by qualified personnel from reputable engineering companies and provided documentation that the facilities were built as designed.

As KG-BM was not able to provide records of QA/QC activities conducted during construction of cyanide facilities prior to 2020, nor as-built certifications for cyanide constructions; the site retained a consultant to conduct a review of cyanide facilities and issued a report that would provide assurance that the continued operations within established parameters will provide protection against cyanide exposures and releases. QA/QC records that were not available during the audit for cyanide facilities constructed before 2020 include 3 process plants, the solution ponds, and heap leach pads at Process #2, Mooney North, Mooney South, and Vantage East area. As indicated in the “Guidance for Use of the Mining operations Verification protocol” of the Code, for leach pad facilities and solution ponds, the auditors should focus on the performance of the facilities to confirm that its components, including the liner system, are working properly. The leach pads and ponds do not have underdrains systems below them. KG-BM has installed monitoring wells immediately downgradient of the cyanide process facilities to monitor groundwater. As mentioned in 4.6, the auditors reviewed groundwater quality data of monitoring wells located downgradient of the 4 leach pads and ponds and verified that cyanide is not detected in any of the wells. This is an alternative method to demonstrate that the leach pad and ponds liners were properly installed and working properly and are protecting groundwater quality. In the case of the 3 process plants, consultant AM Engineering was retained to conduct a review of these cyanide facilities and issued a report that would provide assurance that the continued operations within established parameters will provide protection against cyanide exposures and releases. The objective of the report was to provide an onsite visual integrity review of cyanide facilities at the process plants and verify that they have been designed and constructed to sound engineering practices, the requirements of the Cyanide Code and relevant codes and standards. The draft report shows that cyanide facilities are maintained in

general good condition, with some signs of corrosion that are classified as low risk, and that the site is being operated in a safe manner in accordance with existing protocols. It is the professional opinion of the auditors that the alternative evidence presented by KG-BM complies with the requirements of Standard of Practice 4.8 of the Code.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 4.9

Describe the basis for the Finding/Deficiencies Identified:

KG-BM "Sampling and Analysis Plan" (dated September 2023) addresses monitoring requirements related to groundwater and process fluids. In addition, there are 17 SOPs specific for water sampling. The sampling plan describes the requirements for preparation for sampling, field water quality measurements, groundwater well sampling, sample documentation, calibration of sampling equipment, field data collection, collection and preservation of samples, chain of custody, and transportation. The plan also includes a map with monitoring locations for groundwater. The KG-BM WPCP permits include the cyanide species (WAD cyanide) and other parameters to be analyzed, as well as frequency and sampling locations. The Industrial Artificial Pond permits with the Nevada Department of Wildlife (NDOW), requires having controls in place in open waters to prevent any cyanide mortality, conduct wildlife monitoring, and report all wildlife mortalities. Water monitoring activities are conducted by Environmental department personnel. Samples were sent to Western Environmental Testing labs in Sparks, Nevada during 2021 and since 2022 are sent to Energy Labs in Montana. Both laboratories are certified by the State of Nevada.

Qualified personnel of KG-BM environmental department prepare and update the "Sampling and Analysis Plan" on an annual basis. Staff in charge of preparing the plan are suitably qualified, with many years of experience in environmental management and in mining activities. The plan is updated by environmental technicians, and it is ultimately revised and approved by the Environmental manager. The plan is reviewed and updated every year, or when there have been significant changes in the operations. Analytical protocols for environmental samples are provided by Western Environmental Testing labs in Sparks, Nevada and Energy Labs in Montana, which are certified by the State of Nevada. The auditors reviewed letters of certification and website documentation to verify compliance.

The "Sampling and Analysis Plan" describes preservation techniques, equipment calibration, sampling procedures, chain of custody procedures, QA/QC and shipping instructions. During the recertification period the samples were analyzed at Western Environmental Testing labs in

Sparks, Nevada and Energy Labs in Montana. The analytical protocols have been selected using standard methods to achieve the desired detection limits. The KG-BM WPCP permits include the cyanide species and other parameters to be analyzed (Profile 1), as well as frequency and sampling locations. Examples of completed chain-of-custody forms showing proper use of the forms were reviewed. These chains of custody forms are attached to the quarterly reports that are submitted to the State. Maps showing the monitoring locations with respect to cyanide facilities were also reviewed by the auditors.

KG-BM documents sampling conditions on field notebooks. Data collected in the field notebook includes date and time of sample, the sampler, weather conditions, sampling method, field parameters, static water levels, depth of water and purge volume (for wells). A comments section is used to document abnormal sampling conditions as well as wildlife activity and anthropogenic influences, if applicable. Completed monitoring field forms were reviewed by the auditors and verified that these conditions are being registered consistently.

KG-BM conducts monitoring at frequencies adequate to characterize the groundwater. Groundwater samples are collected and analyzed on a quarterly basis. Records were available and reviewed by the auditors for sampling and monitoring activities. The frequencies of the monitoring activities were deemed to be appropriate by the auditors. It is the professional opinion of the auditors that KG-BM conducts wildlife monitoring at a frequency adequate to identify any issues and implement changes in a timely manner.

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

Standards of Practice

5.1 Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife, livestock, and the environment.

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 5.1

Describe the basis for the Finding/Deficiencies Identified:

KG-BM has developed two draft closure plans as part of their permitting programs for the operations: one for the north area (Mooney Basin and Process #2) and one for the south area (Vantage). These plans are approved by the BLM (Bureau of Land Management) and include

demolition of process facilities. Decontamination of equipment that has been in contact with cyanide is included as an activity in the closure plans. The Fluid Management Plans for the Water Pollution Control Permits include Tentative Plans of Permanent Closure (TPPC). There are 3 tentative closure plans that include decommissioning of leach pads and ponds: Process #2 (dated October 2023), Mooney Basin (dated March 2021) and Vantage (dated December 2022). Only the one for Mooney Basin is currently approved. These plans have been developed by the consultant Newfields. Permanent closure plans will be developed and submitted for approval 2 years before closure. The tentative closure plans do not consider rinsing of heap leach pads. There is no solid cyanide storage at KG-BM and as such, it is not considered as a reclamation item in the closure plan. No water treatment needs for cyanide facilities are considered for the post closure phase as the site plans to dispose of residual solution through evaporation. Decommissioning activities include all the necessary steps to bring the facility's components to a safe, chemically stable condition, such that they do not present a risk to people, wildlife or the environment due to their cyanide content.

The draft closure plans for KG-BM include a conceptual implementation schedule for decommissioning activities, including all cyanide facilities (leach pads, ponds, buildings, process plants, among others) and the sequence and duration of facilities closure. For the north area (Mooney Basin and Process #2) the closure schedule includes initiating closure of leach pads on year 4 for Mooney North, year 6 for Mooney South, and year 11 for Mooney Deep South and Process #2. Closure of ponds will occur between years 9 to 11 and 18 to 20, after evaporation of residual process solution is completed. Building demolition starts in year 6 and goes on until year 20. For the south area (Vantage), the closure schedule includes initiating closure of leach pads in year 16. Closure of ponds will occur between the years 17 and 18. Building demolition is planned to occur in the year 20. These schedules will continue being refined as KG-BM approaches the closure period.

KG-BM reviews the draft closure plans and updates them periodically. The closure plans are updated when closure strategies significantly change. NDEP requires an update of surety bonds for reclamation every 3 years. The Tentative Plans of Permanent Closure (TPPC) included in the Fluid Management Plan for the Water Pollution Control Permits are revised and updated every 5 years as a requirement of the WPCP. In addition, Kinross corporate office requires its operations, including KG-BM, to review and update its Kinross Decommissioning Liability (KDL) cost estimation for the mine, including cyanide facilities decommissioning costs. These costs are reviewed and updated annually and submitted to the corporate office, where they are audited financially by an external party.

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

The operation is: ■ in full compliance
□ in substantial compliance

☐ not in compliance with Standard of Practice 5.2

Describe the basis for this Finding/Deficiencies Identified:

KG-BM has developed cost estimates for full funding of third-party implementation of reclamation and decommissioning activities described in the reclamation plan. Cost estimates utilize the "Standardized Reclamation Cost Estimator" (SRCE), a cost-estimating model developed by the Nevada Division of Environmental Protection and the Bureau of Land Management. The cost estimates include third party unit costs, local equipment rental rates, costs for engineering design, contingency, insurance, performance bond, contractor profit, and agency indirect costs. Kinross Decommissioning Liability (KDL) cost estimation includes cyanide facilities decommissioning costs. These costs are reviewed and updated annually and submitted to the corporate office, where they are audited financially by an external party. According to KG-BM personnel interviewed, these costs are calculated using KG-BM rates.

KG-BM reviews the draft closure plans and updates them periodically. The closure plans are updated when closure strategies significantly change. NDEP requires an update of surety bonds for reclamation every 3 years. The total reclamation costs included in the closure plans for bonding purposes are US$ 177.58 million and US$ 41.25 million for the North and South areas, respectively. KDL cost estimation is reviewed internally and submitted to the corporate office and audited every year as part of the financial statement of the company. In addition, NDEP requires that reclamation plans and costs are updated at least every three years or if there is a major modification of the facilities. The 2023 KDL reclamation cost estimate for KG-BM is US$101.94 million and includes decommissioning measures for process buildings and equipment, heap leach facilities and process ponds, pipeline removal, disposal of wastes, and associated overhead and administrative costs. This amount is for closure and reclamation of all facilities at KG-BM, including decommissioning of cyanide facilities.

KG-BM has established financial assurance mechanisms approved by the Bureau of Land Management (BLM). For the North area, BLM issued a Decision Letter dated Nov 15th, 2023 accepting a Surety Bond Rider for US$177.58 million. This amount is based on the 2023 Reclamation Plan cost estimate. This surety bond is updated and renewed every 3 years. For the South area, BLM issued a Decision Letter dated Nov 2021 accepting a Surety Bond Rider for US$41.25 million. This amount is based on the 2021 Reclamation Plan cost estimate. This surety bond is updated and renewed every 3 years.

6. WORKER SAFETY: Protect workers' health and safety from exposure to cyanide.

Standards of Practice

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 6.1

Describe the basis for the Finding/Deficiencies Identified:

KG-BM has standard operating procedures (SOPs), as well as plans, checklists, and guidelines that describe the management and operation of cyanide facilities to help minimize the possibility of worker exposure to cyanide. The SOPs have been developed for the process plants, the cyanide storage areas, and the Heap Leach Pad (HLP) areas. They provide detailed information for the risks involved with each task (including unloading, plant operations, entry into confined spaces, and equipment decontamination) and adequately describe safe work practices.

The SOPs detail task specific requirements to conduct the tasks, with consideration of safety and potential hazards associated with the job. Verification of the written procedures included review of the specific task, plans and worker interviews. Over 30 cyanide related SOPs are used in the operation and are specific to the individual plants, where required.

The KG-BM procedures require the use of personal protective equipment (PPE) and that operators conduct pre-work inspections for cyanide related tasks. The cyanide related checklists require acknowledgement that personal protective equipment (PPE) required, tools and specialized PPE required, safety and potential physical and chemical hazards associated with the job and procedure have been identified and addressed. In addition to the use of general PPE, such as hard-hat, steel toes boots, hearing protection, high visibility clothing, and safety glasses throughout the production area, areas and/or tasks where personnel may come into contact with cyanide may have additional PPE requirements.

KG-BM routinely solicits input from the workers when developing and evaluating the procedures. This is also accomplished through review of the procedures during safety meetings and during task training. Operators can communicate directly with supervisors regarding effectiveness and opportunities for improvement for the training and procedures. This open-door policy allows workers a means of providing input into the procedures. Operators conduct pre-task and job hazard analyses, which also provide an opportunity for feedback regarding procedures.

A formal procedure review for any new or modified procedures occurs between training and the supervisors. Any changes to procedures are communicated during safety meetings and additional training is conducted, if required. Examples of the safety meetings and topics discussed were reviewed.

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
□ in substantial compliance
□ not in compliance with Standard of Practice 6.2

Describe the basis for the Finding/Deficiencies Identified:

KG-BM has determined appropriate pH levels for cyanide solutions during production activities as part of their operating philosophy to prevent the generation of HCN gas. The pH readings are monitored by the operator during their shift. New hire and annual cyanide refresher training discuss safe pH for handling cyanide in the operation, as well as locations where cyanide is used. The training discusses maintaining an appropriate pH to limit the evolution of hydrogen cyanide gas during production activities.

KG-BM procedures discuss how to measure the pH in the process facilities, as well as steps to take if the pH is too low. This may include the addition of caustic solution and/or additional lime, depending on whether the event occurs on an active leach pad still receiving ore versus an inactive pad where lime can no longer be added. Procedures are in place to address caustic addition to increase the solution pH, if required.

HCN levels are monitored through fixed position gas monitors. These sensors are mounted in all areas of the plant in which HCN exposures are possible. The units are fitted with a visual alarm comprising blue strobes and an audible alarm. If ambient HCN concentrations above 4.0 ppm are detected, the blue light is activated. The blue strobe combined with an audible alarm signal if HCN levels exceed 10 ppm. HCN levels are displayed locally at the front of the unit.

All operations personnel working around cyanide have portable HCN meters as well. These units are also set to alarm at 4.0 ppm and 10 ppm. At 4.0 ppm, the portable units vibrate intermittently and a light on the unit flashes. At 10 ppm or above, the portable HCN meters vibrate continuously with the lights flashing.

The operating procedures require that an alarm being triggered for HCN levels above 4.0 ppm, but below 10 ppm, the area is cleared of nonessential personnel and checked by authorized personnel using a calibrated portable monitor to ensure continuous safe working conditions and evaluate potential causes. Where HCN levels exceed 10 ppm, all workers evacuate the plant to an upwind muster point. The facility is secured from unauthorized access, and the supervisor and mine rescue captain are notified of the issue. With a properly calibrated portable HCN detector, the operator and supervisor will begin investigating the cause and ventilating the building. Only one person may enter the building at a time, with the other person monitoring their activities. Check in with mine rescue is required every 15 minutes until the alarm clears and personnel are allowed to resume normal activities. The area supervisor will perform an

investigation into the cause of the alarm and is responsible for ensuring that proper corrective actions are taken to minimize the risk of future occurrence.

The portable HCN monitors are self-calibrated in their dock station on a monthly basis, with bump tests occurring every day. Fixed hydrogen cyanide monitoring equipment is maintained, tested and calibrated as directed by the manufacturer, and records are retained. Maintenance department is responsible for the calibration of the fixed HCN monitors. Calibration is conducted on a monthly basis. The site's preventative maintenance program automatically generates a work order for the calibration reminder. The calibration and maintenance schedule are considered to meet the manufacturer's recommendation for maintenance of these units. The calibration records for the recertification period were reviewed and found to be complete.

During the audit, it was observed that there were periodic discrepancies between readings for the personal monitors and the fixed monitors. Despite current calibration of the fixed units, the personal monitors are believed to provide a more accurate reading given the bump test requirement each shift prior to use. The auditor requested operations to further investigate this issue, though the mandatory use of personal monitors and the presence of multiple fixed monitors throughout the plant reduce the risk of exposure. A ventilation study and report with recommendations to improve building ventilation was requested as a means of reducing the potential for buildup of HCN in the process plants. The building ventilation was determined to be adequate for Mooney North, Mooney South, and Vantage; however, P2 did not include any mechanical ventilation. A plan was implemented to install ventilation fans to provide adequate ventilation for that facility. No further action is required for compliance.

Warning signs are posted in all areas where cyanide is present advising workers that cyanide is present and that smoking, open flames and eating and drinking are not allowed. No special signage is posted for PPE, as no areas require special PPE beyond that worn for routine operations. Any special task required PPE is indicated in the SOP. The signs are in English, which is the language of the workforce.

KG-BM receives cyanide from Cyanco. The cyanide solution is delivered to the sites with dye already added. The concentrated cyanide solution used on site has a red color for clear identification. This requirement was verified by the auditors during the field visit through visual observation at addition points, interviews with operators, and through the current cyanide SDS available onsite.

KG-BM has installed showers, eye wash stations, and dry powder fire extinguishers at strategic locations throughout the operation in all areas where there is a potential for exposure to cyanide. Two locations were deemed inadequate for access to the safety shower and eyewash station. KG-BM took prompt action by modifying the addition locations to inject cyanide directly into a closed pipeline and by installing additional eyewash stations near the cyanide addition points, reducing the risk to the health and safety of the employees. Evidence of the installation was provided to the auditors, and nothing further is required for compliance.

Showers and eye wash stations are inspected and tested every shift before beginning work in the area and prior to beginning a task that has the potential for cyanide exposure, such as cyanide delivery. Fire extinguishers are inspected monthly and serviced annually, as evidenced by the monthly inspection in iAuditor for each extinguisher, as well as the annual inspection sticker for each unit. The addition of fire extinguishers near the cyanide addition points at Mooney South, Mooney North, and Process #2 was required. Evidence of extinguisher placement was provided to the auditor following the audit and no further action is required for compliance.

The operation has identified all tanks and pipes that contain cyanide solution to alert workers of their contents. Pipes containing cyanide are marked as containing cyanide solution and flow direction is indicated. Cyanide storage and process tanks are marked as containing cyanide. Concentrated cyanide lines are painted purple for easy identification. Verification was by visual inspection. The auditors followed the cyanide solution circuit from the cyanide storage areas to the heap leach pad facilities and the process plants where cyanide is used.

KG-BM has available Safety Data Sheets (SDS) and first aid procedures in all areas where cyanide is managed. AII information relating to cyanide management including SDS information, SOPS and emergency response plans are provided in English, the workforce language at the site.

Electronic safety data sheets (SDS) are accessible to all staff from computers located throughout the facility using the online portal for which all staff are trained to use. Employees receive training on the use and interpretation of SDS, in accordance with Mine Safety and Health Administration (MSHA) requirements for hazard training.

Incidents, injuries, occurrences of property damage, loss to process and near misses are recorded onto an online reporting system Intelex. Reporting is required immediately on occurrence to a supervisor who is then required to provide the preliminary report into Intelex within 24 hours. The incident report is submitted, and appropriate personnel are notified. Any incident involving cyanide is considered a high potential incident (HPI) and requires a higher level of review and investigation. The incidents are routinely assessed further, and the findings are shared at crew safety meetings.

Incidents are investigated in accordance with mine´s guideline with root cause analyses completed. Incidents are retained on the database for categorization and aid in prevention of reoccurrence. Corrective actions are followed up until closure. There have been no health or safety related incidents reported during the recertification period. Several minor environmental incidents occurred. The incident reports were reviewed, including follow up or corrective actions taken to prevent reoccurrence.

A recent procedure change requires any HCN level exceeding 10.0 ppm to be reported and the supervisor to complete an incident investigation. The procedure required a supervisor to investigate, but documenting high HCN incidents was not included in the procedure previously. The operation was requested to provide evidence for December and January of any incidents where HCN exceeds 10.0 ppm. A total of 11 incidents were reported during the period and evidence documenting the incidents was provided, as requested. No further action is required for compliance.

No cyanide related emergencies occurred during this recertification period required the implementation of the emergency response procedures. The investigation procedures were implemented, as required, for non-cyanide related events, such as property damage incidents.

6.3 Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 6.3

Summarize the basis for this Finding/Deficiencies Identified:

Bald Mountain has made available antidote kits, water, oxygen, resuscitators, radios, telephones, and alarms at the site. Amyl nitrite is located throughout the process plants where cyanide is present. The locations of the emergency equipment were deemed to be appropriate for the operation. Oxygen bottles, resuscitators, and other emergency equipment are located in the ambulances. Oxygen bottles, along with additional PPE, are also located in hazmat trailer and in the first aid room. Automated external defibrillators (AEDs) are located throughout the site with employees trained in their use. The site operates two Nevada State licensed ambulances at a basic life support (BLS) level, and mine rescue personnel (EMTs) are available onsite to assist in cyanide emergencies.

All operators carry a radio while performing their tasks. The site “Code Blue” procedure dictates the communication between operators and the emergency response team in the event of an emergency. There are phones located throughout the process plant. All fixed HCN monitors are equipped with an audible and visual alarm, and personnel working in cyanide areas are required to wear personal HCN monitors.

Cyanide antidote kits consisting of amyl nitrite ampoules with expiry date information are located within small refrigerators fitted with thermometers to ensure that the ampoules are stored within a regulated temperature range between 36° and 46°F. A Cyanokit is also available in the first aid room and would be transported with a cyanide exposure patient to the hospital.

Self-Contained Breathing Apparatus (SCBA) equipment is maintained in the emergency response buildings and on the emergency response apparatuses.

Showers and eye-wash stations are located at strategic areas of the plant where cyanide and other chemicals are used. The showers and eyewash stations are tested each shift and prior to cyanide offloading or other tasks in cyanide related areas. The process plant areas are staffed 24 hours per day.

Emergency response equipment is regularly checked by emergency response and other health and safety personnel. This includes inspections of the AEDs, oxygen kits, cyanide antidote kits (amyl nitrite and Cyanokit), and the first aid station. Supplies are replaced if they are used. The eye wash stations, emergency showers and antidote kits are also inspected each shift by the area operator and documented in iAuditor as part of the pre-shift inspection form. Inspections include checks of expiration dates of cyanide antidote kits and ensuring that the kits are stored per the manufacturer's recommendations, with the safety seal number and temperature range of the refrigerator recorded on the log. Mine Rescue personnel inspects the emergency response vehicles and equipment on a monthly basis.

Bald Mountain has an Emergency Action Plan (EAP), which includes a dedicated Cyanide Emergency Response Plan, Hazmat Response Plan, Spill Contingency Plan, and the CHEMTREC Guide for Emergency Responders as attachments. In addition, KG-BM also utilizes the Fluid Management System Operating Plans for Water Pollution Control Permit numbers NEV2017111, NEV0090020, NEV0050045, NEV0089008, and NEV0098100. The documents include communication roles and responsibilities, evacuation procedures, required notifications, and reporting procedures. Sections within the EAP and Plans specifically address emergency response procedures related to cyanide releases and cyanide exposures.

The documents have been developed for multiple scenarios including transportation incidents, releases during unloading, releases during fires and explosions, pipe, valve and tank ruptures, overtopping of ponds, power outages and pump failures, uncontrolled seepage, and failure of the leach pad. The EAP and supporting documents detail the emergency response procedures to address exposure to cyanide through ingestion, inhalation, or absorption through the skin or eyes.

Bald Mountain has its own onsite capability to provide first aid and medical assistance to workers exposed to cyanide. The mine has a fully staffed emergency response team (ERT). Team members cover all four operating crews. Training for the ERT is provided on a monthly basis. Training includes medical/trauma response and firefighting, as well as specialized training in HAZMAT, confined space rescue, and technical rescue (high angle rope). ERT members have achieved different training levels, including emergency medical responders (EMR) and emergency medical technicians (EMT), all of which are achieved through the National Registry of Emergency Medical Technicians (NREMT). The site is licensed by the State of Nevada as an

ambulance service to provide medical response to cyanide emergencies or other medical or trauma incidents.

In addition to the ERT, all personnel who work around cyanide are trained in basic first aid and response to cyanide exposure, including administration of oxygen, amyl nitrite, and use of an automated external defibrillator (AED).

If a cyanide exposure victim requires medical attention beyond the capabilities of the on-site medical facilities, one of the ambulances maintained at the site will transport the victim(s) to Northern Nevada Regional Hospital (NNRH) in Elko or rendezvous with local emergency medical services (EMS) or air ambulance, if required.

Bald Mountain has two dedicated ambulances housed in designated locations at the Mooney South plant and one at the administration area at the main gate. The ambulance is operated by Nevada licensed ambulance attendants (authorized for ambulance operations) registered as EMTs. In the event of an emergency, the ERT will stabilize the scene, perform rescue operations to recover the patient and assist EMTs in stabilizing the patient. The ERT would also provide any patient decontamination required prior to transport

Bald Mountain is confident that the offsite medical facilities have adequate equipment, qualified staff, and expertise to respond to cyanide exposures. It is expected that any victim will be treated for cyanide onsite initially, and once they have been decontaminated, the EMTs transfer the patient to NNRH to provide additional medical care. The ambulances are maintained at the mine site to transfer victims to the hospital, if needed. A formalized agreement was in place with NNRH, acknowledging their willingness and capability to assist in treatment of cyanide exposures, however, the agreement had expired. Following the audit, Bald Mountain obtained an updated agreement with NNRH and provided it to the auditors. No further action is required for compliance.

7. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities.

Standards of Practice

7.1 Prepare detailed emergency response plans for potential cyanide releases.

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 7.1

Describe the basis for the Finding/Deficiencies Identified:

KG-BM has an Emergency Action Plan (EAP), which includes a dedicated Cyanide Emergency Response Plan, Hazmat Response Plan, Spill Contingency Plan, and the CHEMTREC Guide for Emergency Responders as attachments. In addition, KG-BM also utilizes the Fluid Management System Operating Plans for Water Pollution Control Permit numbers NEV2017111, NEV0090020, NEV0050045, NEV0089008, and NEV0098100. The documents include communication roles and responsibilities, evacuation procedures, required notifications, reporting procedures, incident categories and risk assessment. Sections within the EAP specifically address emergency response procedures related to cyanide releases and cyanide exposures. The EAP sets out emergency response procedures for the mine site, including cyanide releases. Procedures for initial response, first aid and spill response, and reporting are provided in the plan.

The EAP outlines steps and measures that would apply specifically to emergencies related to the Heap Leach Facilities (HLF). They detail communication procedures and outline steps to be taken for event detection and relevant actions to be taken, in an emergency. The duties of the ERT and requirements for internal and external resources are also provided.

The documents also address potential cyanide failure scenarios including the catastrophic release of hydrogen cyanide, transportation accidents, cyanide releases on or off of secondary containment, fires and explosions, pipe, valve and tank ruptures, overtopping ponds, power outages and pump failures, uncontrolled seepage, and failure of the heap leach pads.

Under the agreement between Kinross and Cyanco as the supplier, Cyanco and TransWood (as transporter) are responsible for shipping of cyanide to site. This responsibility extends to consideration of transport routes, storage and packaging of sodium cyanide solution, the condition of transport vehicles and response in the event of an emergency or release during transport. As noted above, Cyanco and TransWood are certified in full compliance under the Code.

The EAP details responses specific to cyanide spills or leaks including process solution and reagent spills and makes provision for initial response, first aid, spill reporting contacts and spill control and cleanup. The location of cyanide emergency equipment such as SCBAs, HAZMAT equipment, first aid equipment, etc. are also provided. AII ERT members are trained to respond to emergency incidents. The EAP provides responders rapid access to key information necessary to address a variety of potential emergency scenarios, including cyanide related incidents.

The EAP provides specific procedures, roles, responsibilities, resources to be allocated, lines of communication, and actions to be undertaken in the event of an emergency situation which include scenarios such as pond overtopping or leach pad failures.

Any emergency that has the potential to affect a community will trigger the notification requirements outlined in the Crisis Management section of the EAP. The site will establish and follow the Incident Command System/Unified Command under the National Incident Management System, and the appropriate designated team member will notify all necessary parties, as required. Assigned personnel will contact emergency services, if necessary, and will inform potentially affected communities and parties. A detailed list of contact information for relevant parties is contained within the EAP.

7.2 Involve site personnel and stakeholders in the planning process.

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 7.2

Describe the basis for the Finding/Deficiencies Identified:

KG-BM involves its workforce in cyanide emergency response planning. During training of the ERT and after emergency mock drills, the workforce has the opportunity to provide feedback. Since all employees who work around cyanide are also trained in basic cyanide emergency response, those employees can also provide input in the process.

KG-BM has made potentially affected communities aware of the nature of their risks associated with accidental cyanide releases. The mine is approximately 73 miles south of Elko, 109 miles northwest of Ely, and approximately 60 miles northeast of Eureka.

KG-BM includes external responders in EAP development/planning to a limited extent. The mine maintains periodic communication with community emergency response stakeholders through participation in the Local Emergency Planning Committees (LEPC) for White Pine, Elko, and Eureka counties. The site coordinates with the LEPC groups and Norther Nevada Regional Hospital but they are not necessarily involved in EAP planning; however, the role of each of the outside agencies that may be involved in an emergency are indicated in the EAP, as is the party responsible for requesting outside assistance. KG-BM has a formal agreement in place with NNRH.

Local regulatory authorities, fire departments, and surrounding community partners are also members of LEPC and can provide their input to emergency planning that impacts the community, including feedback to the mine regarding emergency response and the use of cyanide. KG-BM engages extensively with local communities and provides information related to cyanide.

The site considers the participation of regulatory authorities, fire department, local hospital, and community partners. Coordinated exercises are conducted with local responders. Tabletop

incidents involving multiple responding agencies, Cyanco and TransWood have been conducted to evaluate the response to cyanide related incidents; however, given the remote nature of the site, primary emergency response would be provided by the ERT, who are the main participants in full-scale mock cyanide drills.

The mine interacts with potentially affected stakeholders by regular communications and meetings with LEPC, local emergency responders, the hospitals, and other community partners, as well as periodically engaging local partners to participate in tabletop exercises and emergency response drills. The emergency response team regularly interacts with local emergency responders, including LEPC, local ambulance and fire, and NNRH. In addition, External Relations staff interact with community stakeholders. The emergency action plan considers assistance from outside agencies who are consulted regarding their roles in the EAP.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 7.3

Describe the basis for the Finding/Deficiencies Identified:

The EAP provides primary and alternate designation of responsible parties for the management of an emergency, including the General Manager who has authority to ensure that sufficient and adequate resources are allocated to carry out the EAP. The plan details responsible persons for the site.

An ERT roster, which is available with the management team, security, and as part of the EAP, lists ERT members and contact information. A roster of all ERT members on site is emailed out daily, based on a “badge in” procedure. The iAuditor program used by site for a variety of functions also generates a report for “ERT Roll Call”. The roster also indicates the personnel identified as captains, co-captains, and members. Contact telephone numbers are provided for the ERT personnel who would be responsible for mobilizing the rest of the team if the ERT Coordinator is not onsite or is unavailable.

The site uses a mobile application that maintains contact information, including call-out procedures and 24-hour contact information. The Code Blue procedure issues a call for resources over the radio, contacting personnel who are already onsite. The ERT Coordinator or Captain will request additional resources, if required. Contact information for external resources is listed in the EAP. Human Resources sends out on call information for the various departments.

The Bald Mountain Mine Rescue Standards outline the training that must be undertaken by the ERT, and it is the responsibility of the ERT Coordinator to ensure that training is provided and maintained. The ERT Coordinator has overall responsibility to ensure that the current ERT is current and viable and is supported by the General Manager.

Emergency response equipment lists including the locations of cyanide antidote kits are provided in the EAP, as well as on the inspection forms in iAuditor. Verification of these areas was completed during the field inspection. The cyanide emergency response equipment is checked monthly by the ERT and records are retained for a minimum of 3 years. Equipment is also inspected on a regular basis as it is used by the ERT and during training sessions. The team inspects the ambulances and associated equipment, as well as the antidote kits, SCBA units, HazMat equipment, and oxygen.

The role of outside responders is described within the EAP, and it identifies the responsible parties for coordinating requests for outside resources. Contact information is provided in the EAP for relevant outside responders. However, KG-BM is not reliant on external responders for cyanide emergency response.

Emergency response planning requirements have been confirmed with Northern Nevada Regional Hospital in Elko by means of regular communications and letters confirming willingness to support the operation. In addition, local emergency response agencies are part of the Emergency Action Plan and are included in coordination with their respective LEPC. Outside entities may also be included in mock drills, as appropriate.

7.4 Develop procedures for internal and external emergency notification and reporting.

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 7.4

Describe the basis for the Finding/Deficiencies Identified:

The EAP provides the communication and notification process and procedures in the event of an emergency including requests for support from outside agencies, if necessary. Among other responsibilities, the General Manager oversees all operations at the facility during an emergency and is responsible for briefing other team members and notifying corporate personnel and determining whether activation of the crisis management team is warranted.

The crisis management team spokesperson responds to media enquiries; the Health and Safety Advisor advises when reporting to government agencies is required and requests mutual aid assistance if required. The Environmental Advisor provides technical expertise related to emergencies which may impact the environment and is responsible for notifying the regulators

when reporting is required. The EAP provides contact information for the relevant regulatory agencies, outside responders, and medical facilities.

The EAP contains procedures for communications and includes emergency response contact information. In the event of an incident, the site crisis management team will contact relevant State and Federal regulators who will in turn notify affected parties in local communities as necessary. Procedures for notifying outside agencies and the media are provided in the EAP. Contact information of potentially affected communities and the media are included.

During the field investigation, the review of the EAP determined that the requirement for notifying ICMI was not updated in the plan. Following the field investigation, KG-BM provided evidence that the requirement for contacting ICMI for any significant cyanide incident has been added to the plan. No further action was required by the auditors for compliance with this item. KG-BM has not reported any significant cyanide related incident during this recertification period.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 7.5

Describe the basis for the Finding/Deficiencies Identified:

The EAP addresses the recovery actions for cyanide spills. Any contaminated soils are to be properly excavated and disposed of within the leach pad. Neutralization with sodium hypochlorite is permissible within the plan, as long as there is no potential to enter surface waters. The sodium hypochlorite is pre-mixed at the desired concentration and is stored in totes at the warehouse. Any spills of cyanide solution within containment will be returned to the process circuit through the use of the area floor sumps.

All contaminated soils or materials determined to be contaminated after the required sampling are to be excavated and disposed of within the heap leach facility. Sampling occurs until cyanide levels are below 0.2 ppm WAD cyanide. Equipment decontamination is achieved through sufficient rinsing with barren solution and water prior to beginning work.

Drinking water is prepared through onsite generation of potable water. The operation and maintenance manual for the potable water system includes contingency plans for the loss of potable water. Bottled water is available in the warehouse and a contract is in place for bulk potable water to be hauled to site, if required.

During review of the plans during the field investigation, it was observed that the EAP and procedure BM-POP-083 Sodium Hypochlorite permitted the use of sodium hypochlorite to destroy cyanide prior to spill remediation. The reagent is available on site and the procedure did not preclude the use of these reagents for cyanide releases into surface water or that have the potential to reach surface water. There are no surface waters on the site, and it is highly unlikely that any spill could reach surface waters near the site. The EAP and procedure were updated to explicitly prohibit the use of chemicals such as sodium hypochlorite, to treat any cyanide that may contact surface water.

The EAP outlines procedures for responding to a cyanide release, as well as the cleanup methods and sampling requirements. The plans provide the State of Nevada prescribed verification requirement to confirm that adequate cleanup has occurred, requiring verification that residual impacted soils have a WAD cyanide concentration of less than 0.2 ppm. Excavation and sampling will continue until all samples achieve the required cyanide concentration.

For process solution spills, the operators immediately stop the release of material and provide immediate notification to the area supervisor or other responsible person. For reporting, the time of spill or when it was discovered is noted. Samples are collected and provided to the laboratory for analysis. Guidance for assessing the area of impact is provided. A spill report is then generated indicating the type and location of spill/discharge, the cause and the total area affected.

The Environmental Department manages the characterization and remediation of spills and is responsible for reporting spills to the regulatory agencies. In the unlikely event that cyanide was to be identified downstream of the leach pads, the Environmental Department would plan a detailed sampling and monitoring program to investigate the extent of potential impact. The site is required, under the Water Pollution Control Permit, to perform routine groundwater sampling and regulatory reporting program for the site monitoring wells. The sampling frequency and conditions are indicated specified for each well, and if an event occurred, the sampling frequency could be adjusted to determine if any potential impacts to groundwater have occurred. There is no surface water present in the areas that would be impacted by a spill.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 7.6

Describe the basis for the Finding/Deficiencies Identified:

KG-BM reviews the EAP at least annually or as changes are made to the operation impacting the plan. The time the site has been in operation coupled with minimal cyanide related incidents

are indications that cyanide is being properly managed, and the plan is working as required. The ERT routinely tests and reviews the adequacy of the site emergency response with drills and exercises. The EAP is also to be reviewed following implementation during any actual emergency or following mock drills. The Plan updates and reviews are conducted by multiple parties, including the health & safety manager, emergency response coordinator, process manager, and surface manager. Final approval of plan changes is by the General Manager.

KB-GM conducts periodic mock drills based on likely release/exposure scenarios to test the response procedure, and incorporates lessons learned from the drills into its response planning. Records of these drills are kept with the Emergency Response team and were reviewed as part of the evidence. Documentation includes photos, strengths, weaknesses, lessons learned and corrective actions.

Annual drills to test the crisis management plan are conducted. These can apply to any number of emergency scenarios, which may include cyanide and may include external resources, even though KG-BM is not reliant on external support in an emergency. A cyanide-based tabletop exercise was performed during the recertification period and included a full walkthrough by the crisis management team, as well as coordination with and participation by the emergency response team, multiple external responding agencies, Cyanco, and TransWood.. Additional mock cyanide response drills were reviewed, including a scenario involving a cyanide spill during delivery, as well as the release of HCN gas in the process plant.

The EAP is reviewed and updated annually, at a minimum, or as necessary if changes are required or if events warrant review and update. During the recertification period, the plan has been reviewed and as required. No cyanide related incidents or releases have occurred during the recertification period that would require implementation of the EAP.

ERT training exercises and mock drills were debriefed to identify and document improvement opportunities.

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

Standards of Practice

8.1 Train workers to understand the hazards associated with cyanide use.

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 8.1

Describe the basis for the Finding/Deficiencies Identified:

All personnel and contractors working at KG-BM receive formal training on cyanide according to their position and tasks. KG-BM requires that all individuals on-site, including contractors and visitors, receive cyanide awareness training and that individuals accessing the process areas receive an additional plant awareness course.

KG-BM maintains training records for contractors. Prior to arriving on site, contractors and consultants undergo online training through an internal system, “Kinross University”. Training is provided electronically, and competency is tested. The results must be submitted to the site safety team prior to arrival at site. Training includes awareness around cyanide.

The training on cyanide awareness for all employees covers general information related to cyanide, including uses, physical forms, smell, symptoms of exposure, routes of exposure, and exposure limits. For employees working in or around cyanide, additional training is provided which addresses, HCN monitors, addition points of cyanide in the operation, required PPE, pH controls, safety showers and eyewash stations, SDS information, routes of exposure, cyanide intoxication symptoms, first aid, cyanide antidotes, cyanide spill response, and sampling. The cyanide awareness training also includes a test administered to each employee to demonstrate an understanding of the training content.

Annual refresher training including cyanide and environmental modules are provided and completed every year to meet MSHA requirements. The annual training provided by KG-BM does include cyanide specific training, including properties of cyanide, hazards of cyanide, symptoms of cyanide exposure, emergency response, and first aid, including use of oxygen and amyl nitrite. The training includes a written test.

ERT specific response training records are maintained by the Emergency Response Coordinator. Records are available electronically through scans of documents and certifications for ERT members. Cyanide hazard training for ERT members is administered and recorded in the same manner as for operations personnel, as noted above.

Training records, including cyanide hazard training for all employees who may be exposed to cyanide are retained by the process trainer in the form of electronic copies of the training in each employee’s training record. The trainer retains cyanide related training provided to all personnel.

Records for new employee training including orientation training are retained in accordance with MSHA requirements and recorded on MSHA 5000-23 forms. Records are stored electronically in each employee’s training file. Records are also retained for individuals no longer employed at the site.

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

Describe the basis for the Finding/Deficiencies Identified:

All personnel in job positions including cyanide mixing, processing, leaching and maintenance, receive training on how to perform their assigned tasks with minimum risk to worker health and safety.

Operators shadow trained personnel until deemed competent to perform the tasks. Formal task training is conducted on process related SOPs. Training is tracked in a matrix, with documentation, including tests stored in the employee files on SharePoint. Each Procedure requires a signoff from a competent trainer prior to conducting that task.

Process plant specific training, as well as procedure specific training was reviewed. The plant specific training is documented on an electronic form that is retained for each employee. Procedure specific training for each of the SOPs noted above, is documented on an MSHA 5000-23 form and retained.

Standard operating procedures define the steps required to complete a task and the SOP is provided as training material with sign off required from both the trainer (supervisor, process trainer, or other competent person) and the trainee for each task on an MSHA 5000-23 form. The process trainer maintains records of the training requirements for each circuit and retains signed training records for each employee.

KG-BM has developed a comprehensive list of procedures for the leach pad operations and process plants that define the steps required to complete a task that involves cyanide handling in a safe manner. Training on specific tasks is generally provided by the process trainer or the supervisors; however, a lead or competent person may also provide the training. Supervisors are considered qualified to provide training based on experience. MSHA New Miner and Annual Refresher Training are required to be provided by an approved MSHA instructor.

All personnel in job positions that involve cyanide handling are required, prior to working with cyanide, to receive training on how to perform their assigned tasks with minimum risk to worker health and safety. Staff must receive the corresponding task training before being allowed to work with cyanide, in an unsupervised manner and staff must successfully complete the training before they work independently.

Annual refresher training is provided, as required, by MSHA and includes a specific module on cyanide management covering physical and chemical characteristics of cyanide, cyanide handling, monitoring, control of pH levels, exposure limits, exposure symptoms, PPE, treatment, rescue equipment, safety showers, emergency warning systems, evacuation, disposal and spill procedures. Process personnel receive additional cyanide specific training annually.

To evaluate the effectiveness of training related to cyanide, a written test is administered to evaluate the knowledge of the employee and demonstrate understanding of the material. Observation of employees by appropriately qualified individuals requires the employee to demonstrate understanding for the task training they are receiving and document that the training was provided/received with sign off by both the trainer and trainee. Employees must also demonstrate competence in completing the task through observation by the trainer prior to being signed off.

Employee activities and task competence are monitored by supervisors, or a lead person, conducting safety interactions with employees and ensuring process task checklists and procedures are followed. Task observations are utilized at both the process plant and heap leach facilities.

Training records are retained throughout employment history. MSHA training records are retained by the process trainer and retained electronically on the site data server. Employees are also responsible for retaining a copy of their most recent MSHA training certificate. Training records for each employee, covering all training they receive, contain the date, subject covered and are signed by both the trainer and trainee. Written and/or practical tests are completed to demonstrate the employees' understanding of the training materials.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 8.3

Describe the basis for the Finding/Deficiencies Identified:

All operators within the process plants and heap leach facilities, which includes cyanide unloading, process operations, and maintenance personnel, are provided with site-specific hazard training including cyanide awareness, hydrogen cyanide monitoring, emergency response, recognition of cyanide exposure symptoms, cyanide exposure first aid, the role and operation of rescue equipment, decontamination, and actions to be taken in the event of a cyanide spill including sampling.

Cyanide awareness training for employees includes actions to take in the event of a cyanide spill or exposure. Training also covers spill reporting, wildlife mortalities, and spill cleanup disposal. These elements are also covered in the MSHA annual refresher training, which all employees are required to attend. Employees who are actively working with cyanide are trained in cyanide offloading, cyanide equipment decontamination, and remediation of cyanide contaminated soils. Management and response personnel complete regular training drills in accordance with the EAP. All employees working around cyanide, including emergency response, unloading, production, and maintenance personnel, receive training in personnel decontamination and first aid procedures.

Site response personnel, including ERT members and operations and maintenance personnel, take part in routine drills to test and improve their response skills. Some of the drills reviewed included scenarios of HCN gas exposure, sodium cyanide solution exposure during unloading, etc. Debrief reports document the lessons learned, including lessons learned during the exercise.

KG-BM has an Emergency Response Team (ERT) on site, which is formed by personnel from different areas of the mine. ERT members are trained through participation in mock drill exercises as well as formal training programs. Formal training is in place for fire, first aid/medical, HAZMAT response, vehicle extrication, incident command, and technical rescue. Emergency responders are available on all shifts at site. All personnel working around cyanide are also trained in how to react in emergencies situations, including cyanide related events.

Emergency response team members attend monthly training sessions during which cyanide exposure and emergency response topics are covered. Training sessions include the use and inspection of response equipment and administration of oxygen and amyl nitrite. Records of training provided for the ERT members for the last 3 years, as well as equipment inspection documentation was available for review by the auditors and were found to be complete.

KG-BM has communicated with Northern Nevada Regional Hospital in Elko. Regular communications are held with the hospital, during which cyanide emergency and response arrangements are discussed, including decontamination and transport procedures, the treatment protocol for cyanide exposure, and the onsite cyanide antidote kits. In addition, the mine coordinates with three county LEPC groups, which provides emergency response services from each county, if required. In the event of a medical evacuation from site, ground response is by the site ambulance, or county support if required, and air response is coordinated and executed by MedX AirOne or Reach Air.

Annual refresher training is provided, as required by MSHA, to employees and includes response to cyanide exposures and response to releases. The ERT completes monthly training sessions including recognition of cyanide exposure, treatment and first aid. Mock drills are also conducted periodically and involve operations and maintenance personnel, management, and the ERT. The site EMS personnel that would be involved in patient transport are certified by the National Registry of Emergency Medical Technicians (NREMT) and licensed as ambulance attendants

by the State of Nevada. Refresher training, such as for firefighting or EMT/paramedics, may also be subject to specific training requirements to maintain certification.

Annual refresher training is provided, as required by MSHA, to employees and includes response to cyanide exposures and response to releases. A written test is also required for all attendees to demonstrate their understanding of cyanide safety. The training is documented on MSHA's 5000-23 form and includes the name of the trainer, date of the training, and name of the employee being trained. The training topics are outlined in the MSHA approved course curriculum. The ERT completes monthly training sessions including recognition of cyanide exposure, treatment and first aid. Mock drills are also conducted periodically and involve operations and maintenance personnel, management, and the ERT. The Emergency Response Coordinator retains records for ERT members and documents the training topic(s), participants, and instructor(s) on training sign-in sheets.

9. DIALOGUE AND DISCLOSURE: Engage in public consultation and disclosure.

Standards of Practice

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 9.1

Describe the basis for the Finding/Deficiencies Identified:

Bald Mountain uses a variety of mechanisms to provide information to stakeholders related to cyanide management, including reports, meetings, student engagement, and tours to the mine site. In addition, there is an open-door policy that allows stakeholders to engage with the site and voice any concerns.

KG-BM develops an Annual Report, as required for regulatory compliance, as well as an annual Sustainability & ESG (Environmental, Social and Governance) Report produced for the company. Given the site's location, KG-BM participates in community meetings for Eureka, White Pine, and Elko Counties, affording interested parties to attend and receive information in an open forum. A grievance procedure is available to the public and is provided to anyone who may have a complaint. Grievances are submitted by phone or email to Kinross and then passed to the appropriate responsible site personnel. And new permits, as well as renewals are open for public comment. The auditors reviewed evidence of the reports and public meetings held during the

recertification period.

The Community and Social Responsibility (CSR) group organizes tours for stakeholders to visit the mine, including schools, universities, state officials, communities, family members, and tourists. Public tours represent an opportunity for stakeholders to raise questions or concerns related to cyanide management.

Kinross operates multiple social media pages that provide a means of stakeholder communication. Though the pages are not specific to Bald Mountain, the administrators monitor the comments and would contact each site with specific issues, if necessary. The Kinross website also has contact information and provides means of engaging the community.

Many of the site personnel also participate in local committees, such as LEPC, local fire and ambulance services, local wildlife conservation groups, among others. These interactions also provide opportunities for stakeholder engagement regarding cyanide.

There is a grievance and complaint procedure in place to receive, process, manage and resolve written or verbal complaints and grievances in a timely and consistent manner. The CSR team maintains a complaints and grievance register. A form is completed when the complaint is received including the interaction with the complainant, name, and contact information. An email address, info@kinross.com is also available for contacting Kinross corporate and they will contact a specific site, as needed. Any grievances received are targeted for resolution within 90 days. There have been no cyanide related complaints or requests for information in the last 3 years.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 9.2

Describe the basis for the Finding/Deficiencies Identified:

KG-BM has developed and updated written and visual descriptions of how their activities are conducted and how cyanide is managed and has made them available to communities and other stakeholders. The information can be made available and distributed in different engagement opportunities including special meetings, presentations, community meetings, and job fairs, among others. Social media and the website offer additional sources of information for stakeholders.

No cyanide exposures or incidents resulting in hospitalization or fatality have occurred prior to or since the mine was first certified. If an event were to occur, communication to the public would be made per the Emergency Action Plan. Forms of public communications may include press releases, interviews, regulatory reporting, and inclusion of the event in the Annual Report and Sustainability and ESG Report. An event of this magnitude would involve an investigation by MSHA, who would also make information available to the public.

No cyanide releases off the mine site requiring response or remediation have occurred in the last 3 years. There is a procedure in place to respond to such scenario. If an event were to occur, communication to the public would be made per the Emergency Action Plan. Forms of public communications may include press releases, interviews, regulatory reporting, and inclusion of the event in the Annual Report and Sustainability and ESG Report.

No cyanide releases on or off the mine site resulting in significant adverse effects to the environment have occurred in the last 3 years. If an event were to occur, communication to the public would be made per the Emergency Action Plan. Forms of public communications may include press releases, interviews, regulatory reporting, and inclusion of the event in the Annual Report and Sustainability and ESG Report.

Any spill over 500 gallons or cyanide quantities exceeding 10 pounds is immediately reportable to the State. Minor spills are reportable to site management but included in quarterly reporting to the State. In the last three years, one cyanide-related spill of process solution was immediately reported to the State, with eight (8) minor spills documented in quarterly reports. None of these spills were reportable to the Federal level or reportable to ICMI as a significant cyanide incident.

No cyanide releases that cause applicable limits for cyanide to be exceeded have occurred in the last 3 years. If an event were to occur, communication to the public would be made per the Emergency Action Plan. Forms of public communications may include press releases, interviews, regulatory reporting, and inclusion of the event in the Annual Report and Sustainability and ESG Report.

Information regarding spills reported to the regulatory authorities can be made available to the public upon request. The annual report for KG-BM to the regulatory agencies can be made available to the public upon request, which would identify any incidents occurring at Bald Mountain to ensure that stakeholders would be aware of the nature of the incident and the location. Significant cyanide incidents are documented by the company, identifying the site and nature of the incident; however, KG-BM has not experienced a significant cyanide related incident during the recertification period.