

ICMI Cyanide Code Gold Mining Recertification Audit

Summary Audit Report

**Kinross Gold Corporation,
Fort Knox Operation
Alaska, USA**

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

2021 Audit Cycle



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FORT KNOX MINE
ICMC SUMMARY AUDIT REPORT

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Mining Operation: Fort Knox Mine

Mine Owner: Kinross Gold Corporation

Mine Operator: Fairbanks Gold Mining, Inc. (FGMI)

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Location and description of the operation

The Fort Knox mine location is presented in the picture below



Kinross' Fort Knox mine is located 26 miles (42 km) by road northeast of the city of Fairbanks, Alaska. Kinross' mining and exploration properties are located within the Fairbanks mining district, a northeast trending belt of lode and placer gold deposits that is one of the largest gold producing areas in the state of Alaska.

In 1992, Amax Gold Inc. (now Kinross) acquired ownership of Fort Knox. Construction of the mine and mill began in 1995 and was completed in 1997. Commercial production at Fort Knox was achieved on March 1, 1997. In 2008, Kinross commenced construction of a heap leach processing facility, which was commissioned in 2009. A second heap leach processing facility was constructed and commissioned in late 2020.

The mill has a nominal rated capacity of 42,000 tons (38,102 tonnes) per day. The facility consists of a primary crusher, a semi-autogenous mill with two ball mills operating in closed-circuit, a gravity circuit, an agitated cyanidation circuit, carbon-in-pulp gold recovery, and a carbon elution

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and regeneration circuit. Overall gold recovery is 82%, on production of 155,000 gold ounces in 2018.

The Walter Creek heap leach facility processes run-of-mine ore from the open pit with an average stacking rate of 60,000 tons (54,431 tonnes) per day. The facility consists of a lime silo, valley-fill heap leach pad, pregnant solution pumping system, two carbon-in-column plants, and a barren solution pumping system. Gold recovery to date is 57%, on production of 77,000 gold ounces in 2018. The Barnes Creek heap leach facility was commissioned in late 2020 and has the same construction configurations of the Walter Creek leach pad.

Three reclaim feeders transfer the coarse ore from the stockpile onto a conveyor belt that feeds a semi-autogenous grinding (SAG) mill. Powdered quicklime is added directly onto the conveyor belt after the reclaim feeders and before the SAG mill. A vibrating screen classifies the SAG discharge stream. The screen oversize stream (pebbles) is conveyed to a 7 ft (2.1 m) short head cone crusher with a 500 HP (horse power) motor. Most of the crushed pebbles are stockpiled and hauled by truck to the heap leach pads. The remainder of the pebbles are used for stemming and construction material as required. A system of conveyor belts allows the alternative recirculation of the uncrushed pebbles back into the SAG mill, or to bypass the cone crusher and discharge them directly onto the stockpile.

The SAG screen undersize feeds the secondary grinding stage. The secondary grinding stage operates with two parallel grinding lines that operate in closed circuit with a cluster of 10 hydrocyclones. The number of operating cyclones varies to meet the target cyclopac pressure and throughput. The target P80 (80% passing a specific particle size) for the leach feed is 180 microns.

Starting in 2019, Fort Knox conducted several industrial trials at a reduced mill throughput. The first trial was an autogenous (AG) mill trial. Steel addition was paused leading up to the trial to convert the SAG to an AG mill, and only one ball mill was necessary to handle the full throughput throughout the trial. An average throughput of 26,500 tons (24,040 tonnes) per day was achieved during the five-month trial, which was significantly higher than modeled. The second trial was a single stage SAG mill, with both ball mills off, and the cyclone underflow reporting to the SAG. The last trial was a “hybrid” SAG, with one cyclopac underflow feeding the SAG and the other feeding a ball mill. Both of these operating scenarios will be studied further in the future.

A portion of each ball mill discharge stream feeds two XD-48 Knelson concentrators. An additional XD-70 Knelson concentrator pulls directly from the common grind sump. The gravity concentrate feeds an Acacia reactor for intensive cyanide leaching. The pregnant solution from the Acacia feeds a dedicated electro-winning cell to recover the gold and silver on a batch basis. Total gravity production was 18,900 gold ounces in 2018, accounting for 12% of total mill gold production.

The hydrocyclone overflow stream passes through four 12-mesh continuous belt trash screens. The trash screen undersize flows by gravity to the pre-leach thickener distributor where flocculant

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is added at several points. A 110 ft (33.5 m) thickener increases the slurry density from 20% to 53-55% at a pH of 10.5. The thickener underflow proceeds to the cyanidation leach circuit while the overflow is recycled as process water.

The leaching circuit consists of seven leach tanks and six carbon-in-pulp (CIP) tanks. Cyanide is added into the first leach tank and is measured by an on-stream cyanide analyzer (TAC-1000) to maintain 75-150 ppm NaCN. Each tank has a slurry residence time of about two hours.

The carbon concentration is maintained at 10 to 12 g/L in each CIP tank. Slurry passes through 20-mesh screens and the carbon is advanced counter-current by vertical recessed impeller pumps. Loaded carbon is pulled from the first CIP tank in 12-ton (10.9-tonne) batches. The solution is pumped to four 125 ft³ (3.5 m³) electro-winning cells containing stainless steel mesh cathodes.

The discharge from CIP 6 flows by gravity to a standpipe that allows the flow to be sent either to the tailings thickener or directly to the carbon safety screens. In normal operation, the flow feeds the 90 ft tailings thickener where flocculant is added. The thickener overflow is recycled to the process water tank, and the underflow is pumped to the carbon safety screens at 60% solids. The final slurry is diluted with barge reclaim water and pumped to the tailings dam. The cyanide detoxification utilizes dilution to achieve a residual weak acid dissociable cyanide (WAD CN) concentration of less than 10 ppm. The original process design for cyanide detoxification was the INCO SO₂/air process. This system is still in place; however, it is rarely utilized due to the low levels of WAD CN in the tailings stream.

In 2009, a run-of-mine valley fill heap leach facility was constructed and commissioned as a cost-effective treatment option for low-grade ores. It has produced an average of 115,000 ounces of gold per year in extreme weather conditions since the first full year of production. Pad recovery to date is 57% of the stacked ounces with 77,000 gold ounces recovered in 2018. The haul trucks coming directly from the open pit stop at a lime silo before dumping onto the pad in 50 ft (15.2 m) lifts. The newly loaded cell surfaces are ripped with a bulldozer and HDPE piping is placed to feed the drip lines. The solution application rate is 0.003 gpm/ft² on average. The leaching solution percolates through the pad and is collected at the bottom of the valley in the in-heap pregnant solution storage reservoir. From there, the pregnant solution is pumped to the two, parallel, carbon-in-column (CIC) plants at 17,000 gpm (3861 m³/hour). The barren solution cyanide concentration is controlled by a TAC-1000 to maintain a set point of 150 ppm. The CIC carbon is advanced counter-current of the flow. Loaded carbon is pulled from the first tank of each CIC plant in 12-ton (10.9-tonne) batches. The CIP and CIC circuits have a common elution and electro-winning circuit.

The Fort Knox ore processing flowsheet is presented below:

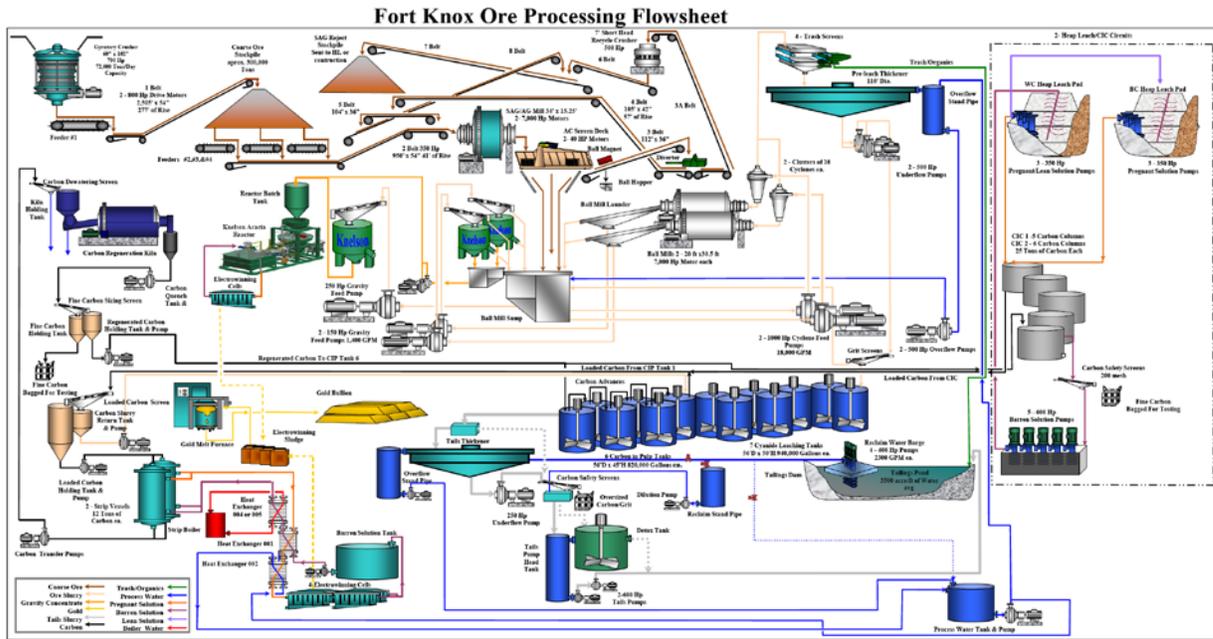
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Auditor's Finding

The ICMI-approved Audit Team verified that the Fort Knox operation is in FULL COMPLIANCE with ICMI Cyanide Code requirements for Gold Mining operations.

Fort Knox 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 and Mining Technical Auditor:	Luis (Tito) Campos E-mail: titocampos@smartaccess.us
Date(s) of Audit:	April 18 th – 22 nd , 2021

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.

Fort Knox Mine
Name of Operations


Signature of Lead Auditor

Apr 22nd, 2021
Date

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SUMMARY AUDIT REPORT

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

Standard of Practice

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

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

Discuss the basis for this Finding/Deficiencies Identified:

During the recertification period until the end of 2019, Fort Knox Mine purchased cyanide from Cyanco International, LLC (Cyanco) – Houston Production Plant, located in Alvin, TX. Starting January 2020, Fort Knox is purchasing cyanide from The Chemours Company (Chemours) Memphis Plant. Contract with Cyanco was signed on June 13, 2017. The Contract with Chemours was signed January 30, 2020 and is valid until December 31, 2022. The contract includes purchasing of cyanide briquettes in one metric ton super sacks from the Memphis Plant. Both contracts require that the cyanide be produced at a facility that has been certified as required by the Code.

Cyanide purchased by Fort Knox for the recertification period was manufactured at facilities certified by the Code. Cyanco International, LLC - Houston Production Plant was first certified on March 6, 2013 and its latest recertification was February 27, 2020. Chemours Memphis Plant was first certified in 2006 and recertified in 2009, 2013, 2016 and its latest recertification was on January 21st, 2020.

Fort Knox sodium cyanide was purchased directly from Cyanco production plant in Alvin, TX, and Chemours Memphis Plant. During this recertification period, Fort Knox has not purchased or received cyanide from any other vendor.

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

Standards of Practice

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

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

Discuss the basis for the Finding/Deficiencies Identified:

The current cyanide purchase contract with Chemours and past contract with Cyanco include cyanide manufacturers (Sellers) responsibility on delivering the product to the mine site. Chemours transportation supply chain, U.S/Canada Rail & Barge Supply Chain is currently certified under the Cyanide Code (from August 18, 2017). The recertification date was recently extended by ICMI until August 31st 2021 due to COVID-19 restrictions. This supply chain includes rail and barge transportation using the Union Pacific Railroad, Alaska Marine Lines, Alaska Railroad Company and Alaska West Express trucking company from the Memphis production plant to Alaska, among other locations.

Cyanide purchase contracts during the recertification period require that all packages include labels and tags containing adequate and accurate information with respect to use, safety and treatment of the products as required by the United Nations for international shipments and by the political jurisdictions the shipment will pass through. The contracts require compliance with the requirements of the International Cyanide Management Code (ICMC) related to production and transportation, including appropriate packaging and labeling in English as all transportation takes place within the United States and via ocean barge transport between United States ports of call. The contracts require that the Seller must ensure the products are properly contained, secured, labeled, safety marked, documented, and inspected during handling, loading, transporting and delivery.

Both contracts require that the Seller must monitor compliance by any third-party carriers with the requirements of the ICMC applicable to handling, loading, transporting and delivery of the products. Alaska West Express (AWE) trucking company, which is the last transport contractor to Fort Knox (for both Cyanco and Chemours), has defined a primary route, and has evaluated alternative routes. Regarding storage and security at ports of entry, both contracts include Seller's responsibility for interim loading, storage, unloading during shipment and unloading at the operation. Safety and maintenance of the means of transportation throughout transport is addressed as seller's responsibility in both contracts, as well as for task and safety training and emergency response for transporters and handlers throughout transport.

The current contract with Chemours includes in Section 13 – Compliance with the Code, all the requirements stipulated by the Code on this standard of practice, and the provision that the producer is responsible for the addition of red colorant dye inside the cyanide super sacks.

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Contracts reviewed establish their responsibility for production and all aspects of transportation of cyanide to the mine site. During the recertification period, contractual requirements for ICMC compliance for both suppliers extend to their entire transportation chain.

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

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 2.2

Discuss the basis for the Finding/Deficiencies Identified:

The current contract with Chemours indicates that the Seller is responsible for all aspects of transportation of cyanide to Fort Knox mine site, as well as cyanide production. Both contracts (with Chemours and Cyanco) commit the Sellers to maintaining ICMC certification and signatory status.

All cyanide transporters to Fort Knox are certified under the Code. Chemours was first ICMC certified on March 05, 2010 and then recertified on August 18, 2017. The recertification date was recently extended by ICMI until August 31, 2021 due to COVID-19 restrictions. The containers from the Memphis production plant are drayed by Intermodal Cartage Company, Inc. and delivered to the Marion, AR. Union Pacific (UP) yard. Intermodal was last recertified on September 19, 2017. The recertification date was recently extended by ICMI until August 31, 2021 due again to COVID-19 restrictions. Cyanco Corporation, Western U.S. Rail, Barge & Truck Supply Chain, supplied the cyanide to the mine site until late 2019. It was first ICMC certified on March 06, 2013 and their last recertification is dated April 22, 2020.

Both supply chains use Alaska West Express Inc. (AWE) trucking company to transport cyanide from Fairbanks to the mine site. AWE is an ICMC certified company which was initially certified on September 14, 2012 and their last recertification is dated January 9th, 2020. AWE provides shipping papers to Fort Knox documenting chain of custody from the point that containers are offloaded from rail cars in the Alaska Railroad Company terminal in Fairbanks to the point of delivery at the Fort Knox mine. Review of sample paperwork for the recertification period indicates that this practice has remained constant since the date of the last recertification audit.

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

Standards of Practice

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3.1 Design and construct unloading, storage and mixing facilities consistent with sound, accepted engineering practices and quality control and 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:

The cyanide mixing area and arrangements for mixing remain substantially unchanged from the previous recertification audit, as no new cyanide facilities have been constructed in this area in the last 3 years. The field component of the audit confirms that the cyanide mixing area was located within the internal structure of the mill on concrete hardstanding maintained in good condition. Mixing tanks were located within containment concrete berms, which are sized to contain at least 110% volume of the largest tank. The storage and mixing areas are also subject to daily inspections at shift start to detect any obvious releases or failure in containment.

The solid cyanide storage area is located in an elevated platform located over competent concrete hardstanding within the tails wash thickener building located inside the process plant area, which is fenced and located far away from communities or surface waters. The area is access controlled with the appropriate cyanide warning signage. The tail wash thickener building is secured from weather and is of large volume with ventilation vents present along the four sidewalls. The internal building structure provides secondary containment for the cyanide storage area. There are no offices located close to the cyanide storage area nor inside the tails thickener building. The cyanide storage area and offload facilities are located a safe distance from the public and away from locations where workers may congregate. Access to the storage area is restricted, with the main access door locked when not in use and internal access restricted by a security chain. Appropriate warning signage is posted at access points. The area is also monitored by the Security area through a closed video camera system. The storage area is dedicated to sodium cyanide storage only, with no other materials permitted to be stored.

The cyanide mixing and storage tank area is located within the process plant, which is located away from people and surface waters. The cyanide mixing and storage tanks are located within the process plant area with adequate ventilation to prevent build-up of hydrogen cyanide gas. The cyanide mixing area has a fixed HCN monitor with visual and audible alarms to detect any HCN gases and evacuate the area if necessary. These tanks are separated from incompatible materials.

Fort Knox has one preparation area for cyanide that includes a mixing tank and a cyanide storage tank. There are level indicators and high-level alarms installed on both tanks. These levels are continuously monitored from the mill control room. Arrangements remain unchanged since the 2018 recertification audit. Cyanide mixing and storage tanks are contained within concrete berms with good condition concrete flooring. The bermed containment areas are sized to contain 110%

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of the largest tank volume and have been confirmed previously as part of engineering specification checks. During the field inspection, the containment area was noted to be in relatively good condition, with no significant damage, spalling or cracking evident.

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

Discuss the basis for this Finding/Deficiencies Identified:

Procedures for managing empty cyanide containers are prescribed in Standard Operating Procedure (SOP) 25.15 "Mixing Sodium Cyanide". The auditor observed a cyanide mixing process and disposal of cyanide containers and verified that the SOP was followed at all times.

Sodium cyanide is received onsite in the form of super sacks. SOP 25.15 "Mixing Sodium Cyanide" specifies measures undertaken to ensure that sacks are managed in such a manner to prevent their use for any other purposes. The SOP specifies that bags and plastic materials are disposed of in the landfill and wood (pallets) and cardboard go to the burning pit. It also requires that empty cyanide sacks are rinsed a minimum of three times with rinse water directed into the cyanide mixing tank. This process is achieved through the activation of a spray device at the point that the super sack is split for dispensing into the cyanide mixing tank. Empty super sacks, once rinsed, are folded and removed along with other packaging residue for disposal at the site's licensed waste disposal site. As cyanide is packed in styrofoam-like material, it is buried in the landfill instead of going to the burning pit.

Fort Knox has SOP 25.15 "Mixing Sodium Cyanide" that outlines the requirements for inspection, observation and mixing of cyanide solutions; as well as the operation and function of valves, pumps and various interlocks within the cyanide mixing process. It also includes instructions for the prefill of the cyanide mixing tank with reclaim water and caustic solution and a requirement for immediate clean up any spilled cyanide including placing it in a suitable container and washing / treating the contaminated area with diluted hypochlorite solution to destroy cyanide. No spills related to cyanide mixing were reported since the last recertification audit.

Fort Knox has SOP OPG 61 "Unloading & Transporting Sodium Cyanide" that provides instructions for the safe handling of sodium cyanide super sacks including handling upon receipt, storage and transport to and from the mixing area. This procedure requires the use of cones to isolate the area during the activity. SOP OPG 61 "Unloading & Transporting Sodium Cyanide" limits stacking of cyanide containers to a maximum height of two per stack.

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Operators are required to use the appropriate PPE during mixing activities. These include steel-toed boots, rubber gloves, rubber boots, approved respirator, goggles or face shield, rubber rain gear, hardhat, safety glasses and hearing protection. SOP 25.15 "Mixing Sodium Cyanide" also requires that two workers are present during the mixing activity. Mixing operations and cyanide alarms are also monitored remotely from the Mill Control Room.

The cyanide briquettes in the super sacks already comes with red colorant dye. This was verified by the auditor during the filed visit. A cyanide mixing event was observed during the audit. The review indicated that Fort Knox has appropriate SOPs and practices to handle and prepare 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:

Fort Knox has several manuals, plans and SOPs for the safe operation of cyanide facilities. All SOPs include a section related to PPE requirements, considerations of safety hazards and potential impacts on the environment. The operation has identified equipment, personnel, and procedures for cyanide unloading and mixing activities as well as for storage facilities, milling facilities, TSF, heap leach pad (HLP) and all associated piping and pumps as having contact with cyanide. SOPs were reviewed and found to be sufficiently detailed to enable safe operation.

The Waste Management Permit No. 2020D80002 issued by the State of Alaska, Department of Environmental Conservation; effective from March 25th 2020 to March 24th 2025, describes the applicable regulatory requirements regarding cyanide concentrations on tailings slurry and cyanide concentrations on the underdrain system beneath the HLPs.

The Walter Creek and Barnes Creek Heap Leach Pad (HLP) Operation and Maintenance (O&M) Manuals and the Tailing Storage Facility (TSF) O&M Manual include design storm events for solution ponds and impoundments and the required freeboard for safe operation. The TSF O&M Manual also includes allowable cyanide concentrations on tailings slurry.

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Starting in this recertification period, Fort Knox has implemented and is operating 3 Reverse Osmosis (RO) treatment plants that treats excess water with some cyanide content: RO1 which treats water from the TSF barge pond; RO2 which treats water from the TSF seepage; and RO3 which treats water from the North TSF pond. Effluents from the 3 RO plants are discharged in one location called Outfall 2. The Alaska Pollutant Discharge Elimination System Permit – Minor Modification, dated June 2018 and valid until May 2023, includes a requirement to discharge treated water with a maximum WAD Cyanide concentration of 0.05 ppm.

Fort Knox has procedure SOP OPG 46 “Management of Change” that includes the identification and review of the proposed changes; analysis and evaluation of the changes by a multidisciplinary team including health, safety and environmental aspects; approval, and training to be provided to manage the change. The process includes a format which is signed off by all areas that participated in the evaluation of the changes.

Fort Knox has an Emergency Response Plan (ERP) dated February 2021 that includes in Section 5.7 a tailings impoundment overtopping or failure scenario. Other scenarios covered in the ERP include increments in seepage and earthquake events. In addition, section 5.0 of the Emergency Action Plan (EAP) dated Feb 2021, provides instructions for shutdowns and closures, short term and extended shutdowns, and for closures from one month up to three years. In case of power outages, Fort Knox has SOPs to run the mill standby generators and to convey the function and operation of the Heap Leach backup generator. The HLP has a 24-hour draindown capacity which provides enough time to respond. In case of cyanide concentrations in the tails water thickener that are higher than the design criteria, Fort Knox has SOP 24.11 “Cyanide Destruction Management” to run the INCO process and lower cyanide concentrations according to the design criteria.

None of the containment areas has any drains to the adjacent land surface. As noted in the previous recertification audit reports, the CIC containment has been fitted with an emergency overflow sump and a large diameter drain line reporting to the CIP/CIL impoundment. The CIP/CIL area contains 13 large solution tanks and is open to the weather, but drains to additional containment areas beneath the tails thickener and detoxification tanks, in the basement of the detoxification plant building.

Fort Knox has a program to conduct inspections of cyanide facilities with frequencies that varies from daily, weekly, monthly, quarterly and annually. The Operating and Maintenance (O&M) Manuals for both HLPs (Walter Creek and Barnes Creek) and the TSF include a list of critical aspects and areas to be inspected and inspection frequencies. Both the HLPs and the TSF are inspected daily for critical aspects including integrity of surface water diversions and available freeboard.

The inspection program of cyanide facilities including unloading, mixing and storage activities and frequency of inspections were found to be sufficient to assure that the operation is safe and functioning within design parameters. The auditor reviewed inspections records for the last 3 years and verified that inspections are conducted on a consistent manner.

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The auditor conducted a field inspection during the site visit and verified the condition of tanks, secondary containments, pipelines, pumps, valves, water diversions, tailings freeboard and heap leach facilities. These inspections also included cyanide unloading, mixing and storage facilities. Records of the inspections conducted by Fort Knox to cyanide facilities were reviewed by the auditor and were found to be complete.

The HLP and its in-heap pond at both Walter Creek and Barnes Creek leach facilities are inspected daily including piezometer readings, liner integrity, Leak Collection Recovery Systems (LCRS), ponding on the heap surface, pH levels in the leachate solution, levels at the in-heap pond, solution collection system, pumping rates, dam and spillway conditions. Examples reports for these inspections were reviewed for the last three years. The LCRS are monitored by Environmental personnel on a weekly basis for flow and cyanide concentrations. Water quality data indicate that there is cyanide concentrations detected between the liners of the new Barnes Creek HLP. This information is reported on a regular basis to the Mill personnel so corrective actions can be implemented.

Fort Knox have two mechanisms to document, track and close corrective actions identified during inspections. Corrective actions identified that are related to maintenance of equipment at the mill, HLPs and TSF are managed by the Maintenance area. These corrective actions are managed using the Oracle JD Edwards system, where work orders are tracked, prioritized, planned and closed. The auditor verified that corrective actions related to cyanide facilities were prioritized for prompt implementation. All other corrective actions not related to maintenance of equipment that are identified through inspections conducted by Management (e.g. Management weekly planned inspections) or other areas (e.g. Environment) are tracked, implemented and followed up until closure.

The Maintenance area has a preventive maintenance program for pumps, pipelines, valves, flow meters, gauges, level sensors, pH meters, 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 installations working properly.

Fort Knox has five emergency power generators, of 6.0 Megawatts (MW) each, on site for backup power, located in a separate dedicated building close to the mill. These generators supply power to the mill, seepage pumping and the administration building (total mine operations require 35 MW). In addition, three small generators (5.5 MW) are in standby for the heap leach facilities and CIC circuit. The generators are checked on a monthly basis for fuel level, lighting, heating and are also start tested.

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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:

Fort Knox has an online cyanide distribution system which provides cyanide continuously to the pre-leach thickener and the leach tanks for dissolution of gold contained in the ore, and to the barren solution for carbon stripping. Cyanide concentration of the process solution is dictated by metallurgy and mineralogy. The operation has defined, based on ore characteristics, a NaCN consumption of 0.135 lb/t for the leach circuit and 0.30 lb/t for heap leach. Addition rates vary depending on head grade of material and recovery.

Cyanide is continually monitored and adjusted as required from the control room using the TAC 1000 Cyanide Controller located on each cyanide addition point. This sampling and monitoring program forms the basis for cyanide addition and/or adjustment and includes pH control. The complete TAC 1000 system is composed of a sampling system, an analytical system, a cyanide controller and a cyanide addition system. These components work together for the determination of cyanide levels and provide control for the cyanide addition.

Cyanide addition rates are monitored and controlled with an optimum target set for cyanide consumption. There are 5 cyanide addition points. 2 at the CIC circuit, 1 at the Acacia, 1 at Leach #1 and 1 at the Barren solution tank. The pH values in the solution are also monitored. Cyanide addition is controlled from the primary control room in the mill. Actual monitoring and measurement of cyanide concentrations at various points in the process is conducted by mill personnel via real time titration analysis.

Fort Knox has two major parameters to control cyanide addition: a) The permit issued by the State of Alaska related to a maximum WAD CN concentration at the tailings slurry; and, b) To have adequate cyanide concentrations in the solution to extract gold from the ore.

The automatized systems allow control of cyanide addition, based on cyanide measurements in the solution, by obtaining maximum recoveries using the correct cyanide concentration. The permit requires the operation to control cyanide content in the tailings slurry, which requires to operate the tails thickener and allowing recovery of a large portion of cyanide solution, which is then reused in the process. Results from the daily cyanide concentration analyses are continuously used to control cyanide addition. The results are reviewed and, if changes are needed, they are communicated to the process operator.

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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:

Fort Knox continues to use a comprehensive, probabilistic water balance using Goldsim software platform. An external consulting company (Knight Piésold) updates climate data on a quarterly basis and calibrates the model. The last calibration report is dated April 2021.

The water balance includes the following factors: solution application rates; tailings deposition rates; precipitation, evaporation and seepage rates; undiverted run-on from upgradient areas; impacts of freezing and thawing; potential power outages; and water treatment capacity (RO treatment plants). A description of the water balance model and calculation is described in the Site-wide Water Balance Development and Guidance Document dated August 2015.

Freeboard in the TSF is regularly monitored to meet the design criteria of 3.0 feet above the water elevation associated with the combined maximum normal operations pond volume, maximum volume of pregnant solution in the Walter Creek and Barnes Creek in-heap ponds, and the 100-year/24-hour rain-on-snow storm water volume. HLP in-heap pond levels at both Walter Creek and Barnes Creek are monitored on a daily basis. The auditor reviewed data for the last 3 years and verified that 5 feet of freeboard was maintained at all times. Diversion channels around the HLP are also inspected daily.

Inspection records for both the TSF and HLPs were reviewed for the last 3 years and found to be complete. The auditor also reviewed monitoring data for the last 3 years and verified that design freeboard for the TSF (3 ft.) and in-heap ponds at both HLPs (5 ft.) were maintained at all times.

The water balance takes into account percolation of surface water, seepage beneath the TSF and subsequent capture through interceptor wells located at the toe of the TSF embankment, from where intercepted water is pumped back to the RO plants for treatment and discharge. The Barnes Creek HLP initiated operation in October 2020. The total pad area of this new HLP is included in the updated water balance.

Starting this recertification period, Fort Knox has implemented and is operating 3 Reverse Osmosis (RO) treatment plants that treats excess water with some cyanide content: RO1 which treats water from the TSF barge pond; RO2 which treats water from the TSF seepage; and RO3 which treats water from the North TSF pond. Effluents from the 3 RO plants are discharged in one location called Outfall 2. These RO plants are included in the water balance since January 2019, when RO2 first started treating water with some cyanide content.

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Seepage from the TSF is intercepted with dedicated collection wells located at the toe of the TSF embankment, and pumped to RO2 plant for treatment and subsequent discharge in Outfall 2. The interceptor wells maintain a cone of depression resulting in a hydraulic gradient towards the wells. The amount of water pumped from these wells are also included in the water balance.

A weather station is situated at the mine and has collected rainfall data since 1990. Precipitation data is used frequently to update the O&M manual for the TSF and both HLPs as they are in constant expansion. The water balance model is updated and calibrated quarterly using recorded water levels, site pumping records, and meteorological records.

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:

During the last 3 years, Fort Knox has been successful at preventing wildlife mortalities related to cyanide facilities. The WAD cyanide values are well below the recommended value of 50 mg/l. Reported values in the TSF pond have been reported below 1 mg/l.

Fort Knox does not operate ponds, impoundments or other areas of open waters with WAD cyanide concentrations above 50 mg/l. SOP 24.11 "Cyanide Destruction Management" specifies that the tailings slurry prior to entering the TSF must be maintained at a monthly average of no greater than 10 mg/l WAD cyanide and a daily maximum of 25 mg/l WAD cyanide. These limits are also specified within the Waste Management Permit (dated March 25, 2020) issued by the State of Alaska Department of Environmental Conservation. There were no events that exceeded permit conditions during the last three years. A review of monitoring results of the barge pond and TSF north dam decant solution for the last three years indicated a maximum WAD cyanide concentration of 0.41 mg/l.

Surface water locations and groundwater monitoring wells are sampled quarterly to demonstrate compliance with the conditions of the permit. Neither surface water nor groundwater monitoring sites showed evidence of impacts from mining operations or tailings impoundment dam.

Cyanide concentration solution applied at both HLPs are above 50 mg/l WAD cyanide (around 250 mg/l). Fort Knox personnel interviewed indicated that in the last 3 years there has been no incidents related to ponding in the HLP. The HLPs are inspected daily for wildlife mortalities, while the TSF inspections forms do not include this item considering the low WAD cyanide concentrations.

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Wildlife mortalities are reported to the US Fish and Wildlife Services (Federal) and two State agencies. These reports include at the top of the form if the mortality was related to WAD cyanide concentrations, and if it is, the carcass will be sent for analysis. The auditor reviewed the wildlife mortalities register and there was no mortalities related to cyanide.

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:

Starting this recertification period, Fort Knox has implemented and is operating 3 Reverse Osmosis (RO) treatment plants that treat excess water with some cyanide content: RO1 which treats water from the TSF barge pond; RO2 which treats water from the TSF seepage; and RO3 which was added in June 2019 and treats water from the North TSF pond. Effluents from the 3 RO plants are discharged in one location called Outfall 2. These RO plants are include in the water balance since January 2019, when RO2 first stated treating water with some cyanide content. Concentrations of WAD cyanide at the discharge point were reviewed by the auditor for the recertification period. All WAD cyanide values reported were well below 0.5 mg/l. The maximum WAD Cyanide concentration reported was 0.239 mg/l.

Fort Knox does not have an established mixing zone after the discharge point in Outfall #2, as this is not a requirement from the waste management permit. The permit requires that Fort Knox meets a 0.5 mg/l WAD cyanide at the discharge point and also meets 0.5 mg/l WAD cyanide at both the Upper and Lower wetlands, located downgradient of Outfall #2 and upgradient of the Fresh water reservoir. Fort Knox indicated that there is presence of aquatic life in the Upper wetland.

As there is no mixing zone established, the 0.022 mg/l free cyanide is to be met at the point of discharge in Outfall #2. As Fort Knox does not monitor for free cyanide, a factor of 2 was used as a relation between free and WAD cyanide (i.e. WAD cyanide doubles the amount of free cyanide in solution) to determine if the value of 0.022 mg/l free cyanide was being met. The measured WAD cyanide concentration in a sample is estimated to be double the free cyanide concentration, as the free cyanide component in a sample cannot be greater than the WAD cyanide component. Concentrations of free cyanide were reviewed for the recertification period. There was only one value at Outfall #2 that does not meet the required free cyanide standard of the Code. In January 2020 a value of 0.239 mg/l free cyanide was detected due to an upset condition in the tailings discharge that affected water to be treated in the RO. The problem was identified and corrected afterwards. In addition, although there was one value of 0.116 mg/l WAD cyanide detected at the Upper wetland, a value of 0.017 mg/l WAD cyanide was reported at the

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Lower wetland, which is below 0.022 mg/l free cyanide. Regardless of these acute exceedances, the auditor considers that Fort Knox discharges have been protective of aquatic life for this recertification period.

Fort Knox does not have any indirect discharges to surface water from cyanide facilities. Water collected from the underdrains from the TSF do not discharge directly to the environment and are sent since January 2019 to RO2 for treatment and subsequent discharge at Outfall #2. Prior to January 2019, this water was collected at pumped back to the TSF. In addition, there is a monitoring system in place including both surface and groundwater monitoring stations located downgradient of HLPs and the TSF to identify presence of any seepage. Review of surface and groundwater monitoring data confirms no cyanide related impacts have occurred to surface or groundwater receptors.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

The main facilities that may contribute to seepage to groundwater are the TSF and HLPs.

The TSF is unlined and was designed and permitted to be a flow through facility. Seepage from the TSF is intercepted with 15 dedicated collection wells located at the toe of the TSF embankment, and pumped back into the TSF pond. Intercepted water is pumped to a tailing seepage sump and subsequently to RO2 for treatment. In addition, there are 7 monitoring wells (MW1-7) located downgradient of the interceptor wells. Three of them (MW 5, 6 and 7) are for regulatory compliance purposes. The pumped flow from all these wells are directed into the seepage collection sump.

The HLPs and its in-heap ponds are placed on the top of a composite liner system where: the in-heap ponds are double-lined and has 36-inch thick overliner drain that acts as a drain and protects the underlying liner system during ore placement. Since the HLP and pipeline corridor are lined as described previously, there is no contribution to seepage.

Fort Knox reports on a quarterly basis to the State of Alaska, as required by the waste management permit. The values reported for WAD Cyanide at MW 5, 6 and 7 are all below 0.008 mg/l for the last three years. The maximum WAD Cyanide readings reported for the IW -1 to 16 was 0.092 mg/l, and no action was required based on the permit.

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In the case of the Walter Creek HLP, there are 3 groundwater wells downgradient of the facility. According to the waste management permit, WAD cyanide concentrations in the underdrain and groundwater well system may not exceed 0.2 mg/l. Maximum WAD cyanide concentrations reported for the last three years are below 0.1 mg/l.

In the case of the Barnes Creek HLP, there are 2 groundwater wells downgradient of the facility and one underdrain. According to the waste management permit, WAD cyanide concentrations in the underdrain and groundwater well system may not exceed 0.2 mg/l. Sampling of groundwater wells started on a quarterly basis before commissioning of the Barnes Creek HLP in October 2020. The underdrain was first sampled in February 2021 on a monthly basis. Monitoring data for the first two months reported a value of 0.0036 mg/l WAD cyanide concentration.

Beneficial uses for the Fish creek drainage includes recreation, water supply, drinking water, agriculture, aquaculture and aquatic life. The monitoring data collected indicate that water quality is protective of aquatic life, which is the most stringent 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:

Spill prevention and containment measures for cyanide tanks remain substantially unchanged from the previous recertification audit. Spill prevention and containment measures are provided for all cyanide unloading, storage, mixing and process solution tanks. All tanks are within an interconnected concrete secondary containment which is in good condition and provides a large containment area. The entire process area is contained within a concrete pad 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.

Secondary containments for cyanide unloading, storage, mixing and process tanks are sized to hold a volume greater than that 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. Secondary containments are sized to hold a volume greater than that 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. The entire process area is contained within a concrete pad 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

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rainwater will be pumped back to the process. The containment system of the cyanide mixing area drains into the milling area. Containment areas have sump pits with dedicated pumps that return collected solutions back into the process circuit.

Fort Knox has several procedures, plans and manuals 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. The SOPs address management of overflows from the sodium cyanide mix tank, the sodium cyanide storage tank, the caustic soda solution mix tank and any spills flow into the concrete bounded area that directs solution to a sump pump that works on a sonic level probe and pumps any solution collected into the sodium cyanide mix tank or the thickener distribution system.

To prevent discharges of cyanide solutions to the environment, or cyanide-contaminated water from secondary containments, Fort Knox has SOPs to minimize downtime and spills, prevent thickener from overflowing slurry, and maintain adequate water flow to the plant; to convey the location and emergency response procedure for the Barren and Pregnant solution pipelines in the Heap Leach; and to encourage employees to keep areas clean and maintain a clean and safe mill.

Spill prevention or containment measures are provided for all cyanide process solution pipelines to collect leaks and prevent releases to the environment. All cyanide pipelines at Fort Knox are located within a secondary containment provided for at the process plant. At the process plant any spill would report into the CIP/CIL secondary containment and subsequently flow over concrete surfacing into the secondary containment of the Detox building. From the Detox building, any liquid would be directed back into the system. Cyanide solution is circulated outside of the process plant through four pipeline systems. The secondary containment at the CIP was upgraded in 2020 to accommodate the Barnes Creek pipeline and contain any flow that could drain towards the CIP in case of pipe failure. With the exception of the new Barnes Creek pipeline, all the other pipeline routes have not been altered since the last recertification audit in 2018 and containment measures remain in place. The tailings deposition pipelines and the reclaim water return line are all positioned so that any leakage would drain to the tailings facility. As mentioned in previous audit reports, no cyanide pipelines present a direct risk to surface water. The new Barnes Creek pipeline from the HLP to the CIP is not considered to pose a surface water risk due to the presence of secondary containment and the routing of any leaks towards the CIP or the in-heap pond. Other pipelines to and from the TSF remain unchanged and retain the same safety features identified in previous audits. All facilities are far away from areas that may require special protection.

All cyanide mixing, storage and process tanks are constructed of coated carbon steel; solution pipelines are constructed of steel or HDPE, which is compatible with high pH cyanide solutions. The new Barnes Creek HLP pipelines are also constructed of HDPE.

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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 Fort Knox. The mine maintains files with QA/QC reports for the facilities constructed before the last recertification audit in 2018, which was found in compliance with the Code requirements, and has implemented QA/QC programs for the new cyanide facilities built during this recertification period. New facilities constructed since the 2018 audit are: Raise of Tailings Storage Facility (TSF) dam; Walter Creek Heap Leach Expansions; Barnes Creek Heap Leach pad; Barnes Creek pump and pipelines corridor; RO plants (3) to treat water with cyanide content.

All Fort Knox QA/QC programs addressed the suitability of materials and adequacy of soil compaction. The mine maintains files with the QA/QC reports for its cyanide facilities. The QA/QC reports include soil compaction tests, subgrade and concrete testing, fabrication material certificates and technical specifications for HDPE drainage products, geosynthetics, 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.

QA/QC records for cyanide facilities are retained by Fort Knox. For the cyanide facilities built since 2018, the auditor reviewed several documents in hard copy and electronic versions. The auditor also verified that QA/QC records are retained for all other cyanide facilities including previous stages of Walter Creek leach pad, the TSF and the Mill.

QA/QC reports are signed by qualified personnel from reputable engineering companies and provided documentation that the facilities were built as designed. auditor reviewed records of construction reports, including as-built drawings for the new cyanide facilities. As-built drawings were properly stamped by a qualified engineer.

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

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

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Describe the basis for the Finding/Deficiencies Identified:

The Fort Knox Monitoring Plan (updated in February 2021) addresses monitoring requirements related to surface water and groundwater, process fluids, decant water composition, avian and terrestrial wildlife, embankment monitoring, developed wetlands and water supply reservoir, solid waste landfill, potable water supply, and mine closure. The Monitoring plan was adopted by reference into the Waste Management Permit (Permit 2020D80002, Section 1.2) by the Department of Environmental Conservation, State of Alaska. The Monitoring Plan is updated when there is a permit renewal or a major change in the operation facilities, such as the addition of the Barnes Creek HLP. The plan includes protocols on how and where the samples should be taken, preservation techniques, equipment calibration, quality control, chain of custody procedures, shipping instructions, and cyanide species to be analyzed.

Qualified personnel of Fort Knox's environmental department prepared and update the monitoring plan as needed. Staff in charge of preparing the monitoring plan are suitably qualified, with more than 20 years of experience in environmental and health and safety management in mining activities.

Fort Knox field data sheets for surface and groundwater samples record in writing weather conditions, ambient temperature, livestock/wildlife activity, field parameters (i.e., conductivity, pH, temperature), groundwater levels and quantity of water to purge. Completed monitoring field forms were reviewed by the auditor and verified that these conditions are being registered consistently.

Fort Knox has prepared a map of water discharges, surface water and groundwater sampling locations. During the last 3 years, Fort Knox has been successful at preventing wildlife mortalities related to cyanide facilities. The WAD cyanide values are well below the recommended value of 50 mg/l. Reported values in the TSF pond have been reported below 0.5 mg/l.

Wildlife mortalities are reported to the US Fish and Wildlife Services (Federal) and two State agencies. These reports include at the top of the form if the mortality was related to WAD cyanide concentrations, and if it is, the carcass will be send for analysis. The auditor reviewed the wildlife mortality register and there was no mortalities related to cyanide.

The Fort Knox Monitoring Plan includes frequencies for samples that varies, between twice per day, daily, weekly, monthly, quarterly and annually. In addition, the Fort Knox Best Management Practices Plan updated on March 2021 includes requirements for sampling of the RO plants discharges and frequencies. The frequencies of the monitoring activities were deemed to be appropriate by the auditor.

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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 and livestock.

- 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:

Fort Knox has developed a conceptual Cyanide Facilities Decommissioning Plan, which was last updated in April 2021. This plan has been developed internally, led by the Environmental department with support from other functions of the operation and includes activities such as decontamination of equipment and removal of residual cyanide reagents. The rinsing of heap leach pads and water treatment systems were removed from the Decommissioning Plan as the closure strategy for these facilities was changed in the Mine Closure Plan approved in March 2020 by the Department of Natural Resources. Current closure strategy considers directing draindown from the heap leach pads and TSF water for treatment in the pit. The document considers decommissioning strategies for facilities and treatment systems which may be cyanide-bearing.

After the cyanide leaching phase on the heap leach facilities, Fort Knox will properly manage any remnant cyanide reagent. Possible alternatives include selling it to another certified mine/industry or final disposal. Any alternative will consider Cyanide Code Standards and legal contracts, clearly defining practices and responsibilities.

The Cyanide Facilities Decommissioning Plan includes an implementation schedule, which details activities to be conducted starting in year 2021 with partial closure of the TSF until 2030 when closure of heap leach pads are projected to be completed. A more detailed schedule is presented in the 2020 Closure Plan, including decommissioning activities of cyanide facilities as well as all other mine facilities. This schedule will continue being refined as Fort Knox approaches the closure period.

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The 2020 Fort Knox Mine Reclamation and Closure Plan submitted to regulators contains conceptual procedures for decommissioning and closure of all cyanide management facilities. This plan is updated every 5 years. The Cyanide Facility Decommissioning Plan, which includes more details related to cyanide facilities than the one included in the Reclamation and Closure Plan, is reviewed and updated every 3 years as indicated in the plan itself. The most recent version is dated April 2021.

5.2 Establish an 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:

State of Alaska regulations require an annually updated decommissioning and closure cost estimate and a mining reclamation bond. The Kinross Decommissioning Liability (KDL), which is Kinross' asset retirement obligation cost estimation, is updated every year including cyanide facilities decommissioning costs. These costs are calculated in-house using third party rates from Alaska Aggregate Products (AAP), which is an earthworks and construction contractor.

The KDL cost estimation figures are included in the Cyanide Facility Decommissioning Plan. The decommissioning cost included in the plan is US\$ 635,774.00 and includes only milling facilities, while the KDL cost includes also closure of leach pads, TSF and other facilities.

The 2020 Fort Knox Mine Reclamation and Closure Plan is updated every 5 years according to Alaskan regulations. As mentioned above, the Cyanide Facility Decommissioning Plan is updated every three years, however, the cost estimate for decommissioning activities are reviewed and updated every year as part of the KDL cost estimation exercise.

Fort Knox has delivered to the State of Alaska an Irrevocable Standby Letter of Credit issued by the Bank of Nova Scotia dated May 5th, 2020 for US\$100.64 million based on the 2020 Closure Plan reclamation costs, that includes closure of the new Barnes Creek Heap Leach Pad. This letter of credit is renewed every year.

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

Standards of Practice

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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:

Fort Knox has SOPs and manuals that describe the management and operation of cyanide facilities to help minimize the possibility of worker exposure to cyanide. The SOPs and manuals have been developed for the cyanide storage, preparation area, mill areas, detox circuit, HLPs and TSF areas. They provide detailed information for the risks involved with each task (including preparation, plant operations, entry into confined spaces, and equipment decontamination) and adequately describe safe work practices.

The SOPs detail task specific Personal Protective Equipment (PPE) requirements, training requirements to conduct the task and acknowledgment, and consideration of safety and potential physical and chemical hazards associated with the job. Verification of the written procedures included review of the specific task, plans and worker interviews. Fort Knox has developed approximately 30 procedures related to cyanide management. Procedures were reviewed and found to be sufficiently detailed to enable safe operation and to minimize worker exposure.

SOPs require the use of personal protective equipment (PPE) and conduct pre-work inspections for cyanide related tasks. In addition to the use of general PPE, such as hard-hat, steel toes shoes, hearing protection and safety glasses throughout the production area, areas and/or tasks where personnel may come into contact with cyanide have additional PPE requirements. Pre work inspections are completed at the beginning of every shift and recorded using the Area Safety and Housekeeping checklist. The auditor reviewed records of these inspections for the Carbon, Leach and Detox circuits for the last three years and found them to be complete.

Fort Knox has procedure SOP OPG 46 "Management of Change" that includes the identification and review of the proposed changes; analysis and evaluation of the changes by a multidisciplinary team including health, safety and environmental aspects; approval, and training to be provided to manage the change. The process includes a format which is signed off by all areas that participated in the evaluation of the changes.

Fort Knox considers worker input into the development of health and safety procedures through various mechanisms and implements an open-door policy for employees to provide input into operations including health and safety matters. Workers have direct communication between supervisors and operators during daily tool box meetings.

Individual process tasks undertaken by workers may also be subject to review by peers and supervisors. Where deviations from procedures are noted including those where cyanide

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handling processes occur, a Field Task Observation may be filled out where improvements to tasks, activities or behavior can be discussed. Health and safety matters are also discussed in daily shift meetings and regular health and safety management meetings.

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:

Fort Knox has determined the appropriate pH for limiting the generation of HCN gas during cyanide mix and production activities. The operational procedure 25.15 "Mixing Sodium Cyanide" requires pH greater than 12 in the cyanide mixing tank and requires a minimum pH of 10.2 in the process solution, which is measured at the cyanide addition points. Solutions within the leach circuit and areas where weak cyanide solutions are used; pH is to be maintained at a minimum of 10.2. Training materials and refresher training includes the requirements to maintain pH at 10.2 for process solutions and 12.0 for reagent solutions. Slurry within the leach circuit is maintained at a pH above 10.2 standard units. Observation of the cyanide mixing procedure confirmed that the mix tank pH was checked prior to addition of sodium cyanide briquettes in accordance with SOP. Within the Heap Leach Facilities, pH levels are maintained through the addition of lime to ore contained in the haul trucks.

Where the potential exists for significant cyanide exposure, the operation use fixed and portable monitoring devices to confirm that controls are adequate to limit worker exposure to hydrogen cyanide gas and sodium, calcium or potassium cyanide dust to 10 parts per million on an instantaneous basis and 4.7 parts per million continuously over an 8-hour period. The units are fitted with a visual alarm comprising red and amber visual cues; and an audio alarm. If ambient HCN concentrations above 4.7 ppm are detected, the amber light is activated. The red alarm signals if HCN levels exceed 10 ppm. HCN levels are displayed at the front of the unit and on monitors within the main control room. Standard operating procedure OPG08 "HCN monitoring systems" requires that in the event of a stationary alarm being triggered at levels above 4.7 ppm, but below 10 ppm, a handheld multi-gas monitor is carried in the area to ensure continuous safe working conditions. Where HCN levels exceed 10 ppm, the SOPs requires evacuation of the area.

Fort Knox has identified the areas where workers may be exposed to cyanide more than 10 parts per million on an instantaneous basis and 4.7 parts per million continuously over an 8-hour period. Working and operational areas where potential for worker exposure to cyanide are identified and monitored with stationary HCN gas monitoring units. Portable HCN meters are provided and made available for use in areas where there is a potential for HCN exposure, such

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as confined spaces. Fixed HCN monitors are located at the cyanide mixing area, leach circuit, CIP circuit, and the detoxification tank. SOPs have been developed for all activities in which cyanide management is involved. These procedures include a section where the PPE requirements are listed. Signage listing the PPE requirements to enter a cyanide facility has been installed at appropriate entrances.

Hydrogen cyanide monitoring equipment is maintained, tested and calibrated as directed by the manufacturer, and records are retained. The Electrical and Instrumentation (E&I) group is responsible for the calibration of the fixed HCN monitors. Calibration is conducted on a monthly basis; manufacturer's instructions require calibration to be conducted every 3 months. The maintenance program Oracle JD Edwards CMMS 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. The handheld gas monitors are used only for specific tasks such as work in confined spaces or to enter an area after HCN levels were detected above 4.7 ppm. Fort Knox has 21 Ventis Pro MX5 units on site. The Pro MX5 units are self-calibrated in their dock station on the first day of each month, with bump tests occurring every day.

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, and that, if necessary, suitable personal protective equipment must be worn. The signs are in English, which is the language of the workforce. The PPE requirements are also posted in each area. Verification was through visual inspection of the signs located in areas where cyanide solution is prepared and used. These areas included cyanide storage, mixing, process plant areas and the detox circuit. No warning signs were observed at the leach pads or tailings storage facilities; however all personnel with access to the heap leach facilities are properly trained regarding the solution concentrations and associated hazards at the heap leach pad.

Fort Knox receives cyanide from Chemours. The cyanide briquettes in the boxes already come with red colorant dye. The concentrated cyanide solution mixed on site has a red color for clear identification. This requirement was verified by the auditor during the field visit.

Fort Knox has installed showers, eye wash station and fire extinguishers at strategic locations throughout the operation in all areas where there is a potential for exposure to cyanide. Additionally, 32 oz. bottles of eye wash solution are located at key locations throughout the mill area and are regularly checked for condition as part of routine safety inspections. Showers and eye wash stations are inspected and tested every shift and prior to beginning a task that has the potential for cyanide exposure. The auditor randomly checked showers and eyewashes during the site tour to verify functionality. Fire extinguishers are inspected and tested monthly. The auditor randomly checked fire extinguishers to confirm they are an acceptable type for use with cyanide. All extinguishers observed were fitted with inspection tags, which documented monthly inspection checks.

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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, including the tailings delivery and return pipelines. Cyanide storage and process tanks are marked as containing cyanide. Verification was by visual inspection. The auditor followed the cyanide solution circuit from the cyanide mixing area to the heap leach pad facilities at the mill circuits.

Fort Knox has available Safety Data Sheets (SDS) and first aids procedures in all areas where cyanide is managed. All information relating to cyanide management including SDS information, SOPS and emergency response plans are provided in English, the workforce language at the site. Electronic SD sheets are accessible to all staff from computers located throughout the facility using the online portal and which all staff are trained to use.

Fort Knox has an SOP for incident reporting and investigation to determine the basic causes of the incident, provide remedial action and medical attention and ensure that a similar incident does not reoccur. Incidents, occupational injuries, occurrences of property damage, loss to process and near misses are recorded onto an online reporting system Intelx. The system includes an option to indicate if the incident was cyanide related. Incidents are investigated in accordance with mine's guideline with root cause analyses completed. There have been no health, safety or environmental cyanide related incidents reported during the recertification period. No cyanide related emergencies occurred during this recertification period required the implementation of the emergency response procedures.

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:

Fort Knox has made available antidote kits, water, oxygen, resuscitators, radios, telephones, and alarms at the site. Amyl nitrite and escape respirators are located throughout the process plant where cyanide in reagent grade is present. The locations of the emergency equipment were deemed to be appropriate for the operation. 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.

Emergency response equipment is regularly checked by Health and Safety (H&S) personnel. This includes inspections of cyanide antidote kits (amyl nitrite and cyanokit), first aid stations (31 in total), eye wash stations, emergency showers and escape respirator stations. Inspections

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include checks of expiration dates of cyanide antidote kits and eyewash bottles and notify Safety if replacements are required. Medical personnel inspects the ambulance on a daily basis, including oxygen bottles and the cyanokit.

Fort Knox has an Emergency Response Plan (ERP) specific to their operations. The ERP includes communication roles and responsibilities, evacuation procedures, required notifications, reporting procedures, incident categories and risk assessment. Section 5.11 of the ERP specifically address emergency response procedures related to cyanide releases and cyanide exposures.

Fort Knox 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). The team comprises 35 members, including two paramedics and the H&S Manager, in four crews (6 to 7 members on each shift). The ERT members are trained to apply the amyl nitrite antidote kits. Two paramedics also form part of the ERT and are certified to provide onsite training. The paramedics are qualified to provide medical/emergency assistance. They have been trained in first aid related to cyanide exposure. The paramedics are trained to apply the amyl nitrate and the Cyanokit. The first aid room is equipped with cyanide antidote kits, oxygen, and first aid kit. Resuscitators (defibrillators) are located in the ambulance, which is ready to provide basic Life Support Service and Advance Life Support. Fort Knox also has a pick truck with level one trauma kit and rescue kit.

If a cyanide exposure victim requires medical attention beyond the capabilities of the on-site medical facilities, the ambulance maintained at the site will transport the victim(s) to Fairbanks Memorial Hospital (FMH). The ambulance is operated by members of the ERT and in the event of an emergency will act to stabilize the scene, perform rescue, recover and stabilize the patient and, with the presence of the paramedics, will transport the patient to FMH. In the event the paramedics are not present, the ERT will transport the patient to the end of the mine road for collection by Steese Ambulance Service, Volunteer Fire Department (SAVFD).

Fort Knox is confident that the 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 on-site, and once it has been stabilized, the paramedics will decide if transfer to FMH hospital is required to provide additional medical care. An ambulance is maintained at the mine site to transfer victims if needed. As such, there is no need to have formalized arrangements with FMH hospital.

Fort Knox performs cyanide emergency mock drills twice a year and holds regular training sessions to the ERT which are expected to attend a minimum of 10 training sessions annually. Some of the drills reviewed included scenarios of HCN gas exposure at the Detox area (two similar drills conducted in October 2020); a cyanide solution release and HCN gas exposure at the Barnes Creek HLP (May 2019); and a cyanide detoxification patient care scenario in 2018. Drills are developed to include a variety of locations and scenarios including environmental release and exposure responses. Drills are developed in advance and risk assessed to minimize

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potential impact of event unpreparedness. Where necessary, weaknesses are identified and improvements to the emergency response procedures made. Observations made are recorded using an Emergency Response Critique Tracking Form where observations and opportunities for improvement are tracked and included in subsequent training events.

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:

Fort Knox has an Emergency Response Plan (ERP), updated in February 2021, that sets out emergency response procedures for the entire mine site including cyanide releases. Procedures for initial response, first aid and spill response, and reporting are provided in the ERP. The operation has also an Emergency Action Plan (EAP), dated February 2021, which outlines steps and measures that would apply specifically to emergencies related to the Tailings Storage Facility (TSF), Walter Creek and Barnes Creek Heap Leach Pads (HLP), and the Water Supply Dam and Reservoir (WSR).

The ERP considers different scenarios appropriate to the site-specific circumstances and includes procedures to respond to emergency incidents including cyanide releases. Section 5.11 of the ERP - Cyanide Leak or Spill describes the risk control procedures and steps to be put into effect immediately for emergency scenarios such as potential failure or catastrophic release of HCN from storage or process facilities, 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, failure of cyanide treatment and failure of tailings impoundments. Further guidance is provided within the EAP, which considers specific scenarios such as earthquakes, excessive spillway flows, embankment overtopping, seepage from darns, embankment failures and cracking, embankment movement, sinkholes, instrument readings, bomb threats and sabotage or vandalism.

Agreements between Kinross and cyanide suppliers Cyanco (until 2019) and Chemours are in place, whereby these organizations and their transporters are responsible for shipping of cyanide to site. This responsibility extends to consideration of transport routes, storage and packaging of sodium cyanide briquettes, the condition of transport vehicles and response in the event of an

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emergency or release during transport. In the event of a cyanide emergency or incident within the mine property, Fort Knox would respond to it as per the ERP. It is the responsibility of the shipper and transporter to comply with such regulatory requirements until the sodium cyanide arrives at and accepted by Fort Knox. Should an incident occur during offsite transportation activities to the Fort Knox Mine, Fort Knox will take no action.

The ERP describe specific response actions. In the event of an emergency involving cyanide release, the ERP and EAP provides for specific actions to be undertaken in case of a release scenario. Section 5.11 of the ERP details responses specific to cyanide spills or leaks including mill 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 escape respirators, eye wash stations, emergency showers and amyl nitrite antidote kits are also provided. ERT members are trained to respond to emergency incidents. In addition, employees are trained in emergency communication and evaluation procedures.

The EAP provides specific procedures related to the Heap Leach Pads, Water Supply Dam and Tailings Storage Facility and details specific roles and responsibilities, resources to be allocated, lines and communications and actions to be undertaken in the event of an emergency situation which include scenarios such as overtopping, embankment failures, sabotage, earthquakes and fires. Any potential emergency situation that has could affect a community will trigger the notification requirements outlined in Section 2 of the ERP. The Emergency Management Team will notify State and Federal parties and emergency services and, in consultation with them, will inform potentially affected communities and parties. A detailed list of contact information for relevant parties is contained within Section 6 of the ERP.

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:

Fort Knox involves its workforce in cyanide emergency response planning. During training of the ERT and after emergency mock drills, the workforce has opportunity to provide feedback. Fort Knox has included external responders in ERP development/planning to a limited extent. The mine maintains periodic communication with SAVFD and FMH hospital but they are not necessarily involved in ERP planning as there is no formal role defined in the ERP for external responders.

Fort Knox has a Crisis Management System in SharePoint (former EMQ), which is a software that considers the participation of regulatory authorities, fire department and surrounding communities (Fairbanks). An exercise is conducted every year.

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The auditor verified that Fort Knox maintains sufficient medical resources, infrastructure and equipment that would not require to treat exposed patients to cyanide in medical facilities off-site. It is expected that any victim will be treated for cyanide on-site, and once it has been stabilized, the paramedics will decide if transfer to FMH hospital is required to provide additional medical care.

Fort Knox has made potentially affected communities aware of the nature of their risks associated with accidental cyanide releases. The mine is approximately 26 miles northeast of Fairbanks, and 13.54 miles from Fox, a former mining camp from the early 1900s and now functions as a bedroom community of Fairbanks. Fort Knox interacts with potentially affected stakeholders by regular communications and meetings with SAVFD, FMH hospital, communities; and periodically summons regulatory authorities, fire department, surrounding communities to table talks and crisis management exercises.

The ERP does not provide specific functions to outside responders as Fort Knox has the resources, equipment and first response capabilities to deal with cyanide related releases and exposures during transportation and within the mine facility. Regardless of that, medical staff regularly interacts with SAVFD and FMH hospital. External responders will only be summoned when additional support is required to respond to an emergency.

The ERP states that the plan is to be reviewed and updated at least once a year or when there is a significant change, shift, risk or expansion within the operation as outlined in the scope of the plan. The revision process involves responsible personnel from all areas. The most recent update was in February 2021 and included general updates in tables and replacing EMQ with Kinross Crisis Management System.

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 ERP provides primary and alternate contact details for the emergency management team members in Table 3, including the General Manager who has authority to ensure that sufficient and adequate resources are allocated to carry out the ERP. Emergency Response Team members are listed in Appendix A of the ERP and indicate both coordinators and team members. The team members are indicated by name, department, and qualifications as well as key areas in which they are trained. Contact telephone numbers are also provided for ERT members,

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rescue coordinators, Kinross corporate contacts and members of the emergency management team.

Appendix H of the ERP sets out training requirements for the ERT and it is the responsibility to the ERT Coordinator to ensure that training is provided and maintained. The General Manager has overall responsibility to ensure that the current ERT is current and viable. The ERT received training during the recertification period.

Contact information in Section 2 of the ERP include call-out procedures and 24-hour contact information for the ERT. The functions and responsibilities of the emergency coordinators is detailed in Section 3.2 of the ERP and Appendix A, and in checklists presented in Appendix G. Emergency response equipment lists including the locations of cyanide antidote kits is provided in Appendix I of the ERP. The cyanide emergency response equipment is checked monthly by Security and records are retained for a minimum of 3 years. Equipment is also inspected on daily basis as it used by the ERT and during training sessions. The list of emergency response equipment is presented in Appendix I. Fort Knox does not use off-site responders for on-site emergencies. Appendix B of the ERP includes interactions with SAVFD, if required, in case of transport of a patient to Fairbanks.

The ERP does not provide specific functions to outside responders as Fort Knox has the resources, equipment and first response capabilities to deal with cyanide related releases and exposures within the mine facility. Regardless of that, medical staff regularly interacts with SAVFD and FMH hospital. External responders will only be summoned when additional support is required to respond to an emergency. Fort Knox does not involve external responders in emergency mock drills. Current contact information for fire, police, and hospitals is included in the ERP.

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 ERP provides a communication and notification tree and procedures in the event of an emergency including request of support to SAVFD if necessary. Among other responsibilities, the Emergency Manager oversees all operations at the facility during an emergency and is responsible for briefing other emergency team members and notifying Kinross Corporate personnel; the Public Relations Coordinator responds to media enquiries; the Health and Safety Coordinator advises when reporting to government agencies is required and when mutual aid assistance is required; the Environmental Coordinator provides technical expertise related to

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emergencies which may impact the environment and is responsible for notifying the regulators when reporting is required. Section 6 of the ERP include a list of contact information for Fort Knox personnel, Kinross Corporate personnel, regulatory agencies, outside responders and medical facilities.

The ERP contains procedures for communications and includes emergency response contact information. In the event of an incident, the Emergency 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 ERP, EAP and the Fort Knox Crisis Management System. Section 6 of the ERP include contact information of potential affected communities and the media.

7.5 Incorporate into response plans monitoring elements and remediation measures that 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 ERP provides procedures in the event of cyanide release and addresses cyanide recovery and remediation if necessary. Section 5.11.3 of the ERP requires that any cyanide containing solution spilled outside of a contained area at the mill be pumped onto a contained area for temporary storage and then is sent back to the process circuit. Any spills of solid cyanide briquettes will be cleaned with brooms/shovels and placed in containers and subsequently recycled through the mill circuit. Cyanide impacted soils are to be excavated to depth of impact and deposited into the process or tailings storage facility until cyanide levels are below 27 mg/kg as free cyanide. The ERP notes that sodium hypochlorite is toxic to aquatic life and is not to be used to treat cyanide spills in surface waters. Reportable quantities of sodium cyanide and process solution are indicated in Table 4 of the ERP. Further guidance is provided in the Spill Reporting and Waste Disposal procedure. Drinking water is trucked to the mine from an offsite facility. Frequent testing required by the authority is strictly adhered by Fort Knox. Bottled drinking water is available in break rooms throughout the mine site.

Section 5.11 of the Emergency Response Plan prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat any cyanide that would have been released into surface water.

Section 5.11.4 of the ERP and SOP OPG16 "Spill reporting and sampling" outline procedures for validation sampling of any cleanup or remediation measures in the event of a cyanide release. The number of samples is also specified depending on the area of impact. For process solution

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spills, the ERP and Reporting and Sampling SOP requires operators to immediately stop the release of material and notify the Area Supervisor and security. The procedure requires that the time of spill is noted; samples are collected and provided to the laboratory for analyses. Final sampling of the affected area is specified. The Environmental Department would manage the characterization and remediation of any larger spills and is responsible for reporting spills to the regulatory agencies. In the unlikely event that cyanide was to be identified downstream of the tailings dam, the Environmental Department would plan a detailed sampling and monitoring program to investigate the extent of potential impact.

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:

Fort Knox annually review the cyanide related elements of the ERP as is required in the ERP: Section 1.3 Description of the ERP requires to annually review risk assessments and the Emergency Response Procedures to identify any required changes, and to test and review the adequacy of Emergency Response Procedures with drills and exercises. Section 3.2 Emergency Preparedness Performance Responsibilities requires the General Manager to ensure annual reviews of the Emergency Response Plan are carried out, the H&S Manager to conduct a review of all emergency response needs identified by regulatory requirements and ensures that these are included in the Emergency Response Procedures and to, at least annually, conduct a review of emergency response procedures for adequacy.

Fort Knox performs cyanide emergency mock drills twice a year and holds regular training sessions to the ERT which are expected to attend a minimum of 10 training sessions annually. Some of the drills reviewed included scenarios of HCN gas exposure at the Detox area (two similar drills conducted in October 2020); a cyanide solution release and HCN gas exposure at the Barnes Creek HLP (May 2019); and a cyanide detoxification patient care scenario in 2018. Drills are developed to include a variety of locations and scenarios including environmental release and exposure responses. Drills are developed in advance and risk assessed to minimize potential impact of event unpreparedness. Where necessary, weaknesses are identified and improvements to the emergency response procedures made. Observations made are recorded using an Emergency Response Critique Tracking Form where observations and opportunities for improvement are tracked and included in subsequent training events.

ERP Section 1.3 "Description" requires to test and review the adequacy of Emergency Response Procedures with drills and exercises. Procedure EHS-HS120B "Emergency Response and Drill" requires to critique emergency preparedness and response procedures during emergency

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situations or preparatory drills. No cyanide related emergencies occurred during this ICMC recertification cycle requiring the implementation of the emergency response procedures.

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 new hires, contractors and visitors at Fort Knox receive an initial general induction training on health, safety and environmental matters before they can start working or enter the mine. New workers at the mine, including both employees and contractors, receive orientation training in accordance with Mining Health Safety Administration - MSHA 5023. This comprises 24 hours of orientation training of which 16 hours is dedicated to health and safety training. Cyanide hazard recognition and awareness training is included in these modules and is part of MSHA training for Fort Knox. Interviews with employees that mixed cyanide, as well as with employees at the mill and the heap leach operations were conducted, showing knowledge on cyanide management.

Annual refresher training including cyanide and environmental modules are provided and completed prior to November of every year to meet MSHA requirements. Additionally, quarterly environmental training sessions are provided to employees and consist of 2 hours training per year divided into 30-minute sessions. The training includes a written test. Training is provided by the Mill Trainer who also retains copies of the most recent cyanide related standard operating procedures and training material. Training records are retained on a computerized system. Training is recorded on sign-in sheets with training records signed by both trainer and trainee.

Training records, including cyanide hazard training for mill operations are retained by the Mill Trainer in the form of hard copies and an electronic version stored in Microsoft Excel spreadsheet format. The Mill Trainer retains cyanide related training provided to process personnel, while the Administrative Service area retains training records for all other employees, including cyanide training schedules and records. 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 on an electronic database Laserfiche.

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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:

New mill employees and any worker with cyanide related tasks receive a specific training on SOPs that apply to their job position. This training is provided by the Mill Trainer and Supervisors on operating procedures including both general procedures applicable to all site areas as well as those specific to a task. The SOP is used as a record of training and is signed by both the supervisor and the trainee. Operators are also instructed on the use of cyanide task observation sheets and area inspections, which are carried out within work areas. Training records are also retained on a spreadsheet by the Mill Trainer and a hardcopy file. Task training checklists have been developed for specific process circuits such as CIP Leach, Carbon Strip, Detox, among others. Operators are assigned to Supervisors who issue development plans including specific training requirements for their work areas. Development plans are used as the basis for employee career development.

Standard operating procedures define the steps required to complete a task and the SOP itself is provided as training material with sign off required from both the trainer (Supervisor or Mill Trainer) and the trainee. Training elements required for a task or area is recorded on a training sheet that is maintained by the Supervisor. Training materials are largely confined to the governing SOPs, which are also readily available on the Fort Knox intranet. The general and specific training elements (SOPs) required for a work area are summarized on a training sheet that is maintained by the supervisor.

Fort Knox has developed a comprehensive list of procedures for the mill and leach pad operations that define the steps required to complete a task that involves cyanide handling in a safe manner. The SOPs include a section of acknowledgement of the training received, which is signed off by trained and/or the supervisor that ensures the person is qualified to conduct the task. Training on specific tasks is provided by a lead or competent person, the Mill Trainer, or the Supervisors. Supervisors are considered qualified to provide training based on experience. The Mill Trainers are certified MHSA Trainer.

All new employees are trained to receive a minimum specified level of site orientation as require by MSHA before being allowed to operate onsite. Training includes cyanide awareness training and, for those that will be working within the Mill or heap leach pad facilities, specific training on relevant SOPs for the task that they will perform. In addition, employees must complete general and specific task training before being allowed to work alone.

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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. In addition to refresher training, any changes to standard operating procedures, including those to cyanide related tasks, are reviewed and conveyed at shift safety meetings. Employees also undergo training on SOP changes, which is recorded on revision acknowledgment forms, which are retained by the Mill Trainer.

Following new hire orientation and cyanide refresher training; employees complete a written test to demonstrate understanding of the material. Verbal tests of understanding are undertaken for task training as well as signing the relevant standard operating procedure to indicate understanding.

Training records are retained throughout employment history. MSHA training records are retained by the Mill Trainer and retained electronically on both the site data server and on a data management system Laserfiche. Training records contains the date, subject covered and is signed by both the trainer and trainee. Written and verbal 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 Mill, which includes cyanide unloading, mixing, production 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, and actions to be taken in the event of a cyanide spill including sampling.

Cyanide awareness training to workers includes actions to take in the event of a cyanide spill. Training also covers spill reporting and the Waste Disposal and Spill Reporting Procedure. Employees who are actively working with cyanide are trained on OPG61 "Unloading and Transporting Cyanide", OPG28 "Cyanide Decontamination" and OPG16 "Spill Reporting and Sampling". Management and response personnel complete regular training drills in accordance with the EAP and ERP. Site response personnel, including paramedics, take part in routine drills

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to test and improve their response skills. Some of the drills reviewed included scenarios of HCN gas exposure at the Detox area (two similar drills conducted in October 2020); a cyanide solution release and HCN gas exposure at the Barnes Creek HLP (May 2019); and a cyanide detoxification patient care scenario in 2018. Drill critiques are performed and actions followed up until closure.

Fort Knox 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 brigades are in place for fire, first aid, spill, and evacuation. Emergency responders are available on all shifts. Fire wardens (emergency coordinators) are also trained on how to react in emergency situations, including cyanide related events. Mock scenarios and drills are regularly undertaken to test the effectiveness of the ERT, the ERP, and the Kinross Crisis Management System. The review of drills performance reports showed that the ERT actively participated in emergency drills including those scenarios involving cyanide emergencies. Emergency Response Team Members attend twice a month training sessions during which cyanide exposure and emergency response topics are covered. Training sessions include the use and inspection of response equipment.

No off-site emergency responders would be included in an emergency response to a cyanide release. The ERP does not provide specific functions to outside responders as Fort Knox has the resources, equipment and first response capabilities to deal with cyanide related releases and exposures within the mine facility. Regardless of that, medical staff regularly interacts with SAVFD and FMH hospital. External responders will only be summoned when additional support is required to respond to an emergency. The auditor verified that Fort Knox maintains sufficient medical resources, infrastructure and equipment that would not require to treat exposed patients to cyanide in medical facilities off-site.

Annual refresher training is provided as required by MSHA to employees and includes response to cyanide exposures and response to releases. The ERT completes regular twice a month training sessions including recognition of cyanide exposure, treatment and first aid.

Fort Knox performs cyanide emergency mock drills twice a year. Drills are developed to include a variety of locations and scenarios including environmental release and exposure responses. Procedure EHS-HS120B "Emergency Response and Drill" provides a framework for continuous improvement by setting requirements to critique emergency and response procedures as well as performance against procedures. Where necessary, weaknesses are identified and improvements to the emergency response procedures made. Observations made are recorded using an Emergency Response Critique Tracking Form where observations and opportunities for improvement are tracked and included in subsequent training events.

Training records as required by MSHA are retained by the Health and Safety Data Supervisor and stored on an electronic database Laserfiche, including cyanide training records. Mill cyanide training and refresher records are retained and kept current by the Mill Trainer using Microsoft

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Excel with paper copies kept on file. Task training records also include sign-off by the employee and trainer with confirmation that training material has been understood. Training records include the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials.

9. DIALOGUE: Engage in public consultation and disclosure.

Standards of Practice

9.1 Provide stakeholders the opportunity to communicate issues of concern.

- 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:

Fort Knox continued using mechanisms to provide opportunities to stakeholders to communicate their concerns related to cyanide management, including reports, meetings, engagements and tours to the mine site.

Fort Knox develops an Annual Activity Report, which is provided to local, state and federal regulators. This report includes information about mining activities and, among other topics, provides information related to cyanide management and compliance with the International Cyanide Management Code. The auditor reviewed evidence of the Annual Activity Report for 2020 and the annual meeting which was held virtually on March 2021 due to COVID-19 restrictions. Annual meetings for the previous years were held face to face.

The community relations department organizes tours for stakeholders to visit the mine, including schools, universities, state officials, communities, family members, and tourists. Public tours occur during the spring and summer season and represent an opportunity for stakeholders to raise questions or concerns related to cyanide management. These tours were cancelled since the outbreak of the COVID-19 pandemic. The auditor reviewed evidence of tours conducted in 2019 and 2020. For the second part of 2020 and 2021, Fort Knox developed a video of the operation to replace the tours.

As a new mechanism to communicate to stakeholder during the COVID-19 pandemic, Fort Knox launched in Q1 2021 a Facebook page that provided relevant information to stakeholders. In addition, a general community relations email address Fortknoxcommunityrelations@kinross.com was launched so anyone can contact Fort Knox without the need to get in contact with a specific person.

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Fort Knox has a grievance mechanism in place to receive, process, manage and resolve written or verbal complaints and grievances in a timely and consistent manner. The External Affairs manager maintains a complaints and grievance register, which was reviewed by the auditor. A form is completed when the complaint is received including the interaction with the complainant, name and contact information. There have been no cyanide related complaints or request for information in the last 3 years.

The community relations department maintains a community engagement plan, which includes a schedule of meetings with public officials, agencies and communities. Fort Knox also participates in the Alaska Miner Association weekly meetings, which represents another opportunity for engagement. Many of these engagement opportunities are occurring in virtual mode due to COVID-19 restrictions.

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

- 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:

Fort Knox utilizes the same mechanisms described in 9.1 as opportunities to interact with stakeholders and provide them with information regarding cyanide management practices and procedures.

Mine tours are open to the public including schools, universities, regulators, communities, and other interested parties. During such tours, mine information including cyanide management is readily made available to tour groups, including a safety video that explains the safe management of cyanide. The tours were cancelled in 2020 due to the COVID-19 pandemic and were replaced by a new video of the Fort Knox operations.

Cyanide related information provided to employees includes information booklets and pamphlets including a booklet describing the symptoms of cyanide poisoning. A cyanide application factsheet is also provided to staff and contains details of safeguards, shipping and handling and waste disposal.

The Annual Activity Report, which is provided to local, state and federal regulators includes information about mining activities and, among other topics, provides information related to cyanide management and Fort Knox's compliance with the International Cyanide Management Code. In case of occurrence, this report should include any cyanide incidents related to cyanide management and releases, which is not the case as there were no cyanide related incidents in

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the last 3 years. During regulator or public visits, this information is made readily available as well as any information requested which pertains to cyanide management at the mine.

9.3 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 9.3

Describe the basis for the Finding/Deficiencies Identified:

Fort Knox 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. These include a Fort Knox institutional video presenting the mine and plant process; Environmental fact sheet 2018 containing information related to the Cyanide Code; Regular Fort Knox brochure which provides a very general discussion of the use of a chemical leaching process, and includes a brief note about the purposes of the ICMC and the certification of the Fort Knox site; the Annual Activity Report, which is provided to local, State and Federal regulators and includes information about mining activities and, among other topics, provides information related to cyanide management and Fort Knox's compliance with the International Cyanide Management Code; and the Cyanide Application fact sheet containing details of safeguards, shipping and handling and waste disposal and is distributed when people requires more information about cyanide. This information is made available and distributed in different engagement opportunities including fairs, meetings, presentations, conferences, Chamber of Commerce events, among others. These were replaced by social media interaction and communications during the COVID-19 pandemic.

Information on cyanide-release scenarios would be made available publicly by means of local community meetings and by reporting to regulatory agencies in Alaska. Information on cyanide releases would also be included in the Kinross annual corporate responsibility report, separately identifying any incidents occurring in Fort Knox so that stakeholders would be aware of the nature and location of the release.

There has been no cyanide exposures or incidents resulting in hospitalization or fatality have occurred prior to or since the mine was first certified. In case of occurrence, it is included in the Annual Activity Report.

In the last 3 years there has been no cyanide releases on or off the mine site resulting in significant adverse effects to the environment; no cyanide releases off the mine site requiring response or remediation and no cyanide releases that are or that cause applicable limits for cyanide to be exceeded.

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