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and:

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ICMC CERTIFICATION CORRECTIVE ACTION PLAN

Kinross Gold Corporation
Round Mountain Gold Corporation

August 31, 2026

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Signature Page

August 31, 2026

ICMC Recertification Corrective Action Plan

Kinross Gold Corporation
Round Mountain Gold Corporation



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1. INTRODUCTION

The “International Cyanide Management Code for the Manufacture, Transport, and Use of Cyanide in the Production of Gold” (Cyanide Code) was developed by a multi-stakeholder Steering Committee under the guidance of the United Nations Environmental Program (UNEP) and the then, International Council on Metals and the Environment.

The Code is a voluntary industry program for mining companies who use cyanide in their processes, and companies involved with the production and transport of cyanide to these mining companies; it focuses exclusively on the safe management of cyanide. Companies that adopt the Code must have their operations, which manufacture cyanide, transport cyanide or use cyanide to recover gold and silver, audited by an independent third party to determine the status of the Code’s implementation. Those operations that meet the Code’s requirements can be certified and be able to use a unique trademark symbol, which identifies the company as a certified operation. Audit results are made public to inform stakeholders of the status of cyanide management practices at the certified operation.

The objective of the Code is to improve the management of cyanide used in mining and assist in the protection of human health and the reduction of environmental impacts (refer to www.cyanidecode.org). The Code is managed by the International Cyanide Management Institute (ICMI).

Environmental Resources Management, Inc. (ERM) was retained by Kinross Gold Corporation (Kinross) to audit the use of cyanide at its wholly owned subsidiary Round Mountain Gold Corporation (RMGC) to determine the status of compliance with the Code with respect to recertification. The RMGC Mine was originally certified as fully compliant with the requirements of the Code in May 2007.

The auditors used the *Mining Operations Verification Protocol* (the Protocol) developed by the ICMI and updated in June 2021 to guide the audit process. The Code’s *Guidance for Use of the Mining Operations Verification Protocol* (Guidance, June 2021) developed by the ICMI was used to interpret the Protocol questions and aid in evaluating the measures taken to meet the Standard of Practices. The questions posed in the Protocol are based on those measures typically appropriate to meet the Principles and Standards of Practice.

The audit was conducted via a remote documentation review and a two-day site visit on May 13-14. Based on the evidence observed, RMGC was found to be in substantial compliance with four Standards of Practice. This Corrective Action Plan (CAP) has been prepared to meet the requirements of the ICMI Guidance and to demonstrate that RMGC has met the obligations in implementing the Cyanide Code.

Name of Mine: Round Mountain Gold Corporation

Mine Owner: Kinross Gold Corporation

Mine Operator: Round Mountain Gold Corporation

Name of Responsible Manager: Ben Scholz, General Manager

Address and Contact Information: Round Mountain Gold Corporation
#1 Smoky Valley Mine Road
Round Mountain, NV 89045

Audit Company: ERM, Inc.

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Date of Audit:

The Recertification Audit was completed by remote documentation review and a two-day site visit on May 13-14, 2026

2. STANDARDS OF PRACTICE IN SUBSTANTIAL COMPLIANCE

2.1 Principle 4 – Operations

Manage Cyanide Process Solutions and Waste Streams to Protect Human Health and the Environment

Standard of Practice 4.1: *Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventative maintenance procedures.*

Protocol Question 4.1.4: *Does the operation implement procedures to review proposed changes to production processes, operating practices or cyanide facilities to determine if they may increase the potential for cyanide releases and worker exposures, and incorporate any measures necessary to protect worker health and safety and the environment?*

DESCRIPTION OF THE DEFICIENCY:	REQUIRED CORRECTIVE ACTION:	EVIDENCE REQUIRED:	PROPOSED COMPLETION DATE:
For the storage tank that was used as a temporary cyanide storage tank, RMGC inspected the condition of the tank; however, they did not implement their Management of Change (MOC) process since the temporary tank was not a replacement in kind.	RMGC will complete Management of Change trainings with salaried employees to reinforce when the MOC process is to be followed.	Documentation that RMGC adheres to their MOC process when evaluating changes in their cyanide facilities if a change or modification is proposed prior to the Proposed Completion Date. Completed training records to demonstrate that staff was trained on the MOC process so they know when to implement the MOC process.	August 30, 2026

2.2 Principle 7 – Emergency Response

Protect Communities and the Environment through the Development of Emergency Response Strategies and Capabilities

Standard of Practice 7.2: *Involve site personnel and stakeholders in the planning process.*

Protocol Question 7.2.2: *Has the operation made potentially affected communities aware of the nature of their risks associated with accidental cyanide releases, and consulted with them directly or through community representatives regarding appropriate communications and response actions?*

DESCRIPTION OF THE DEFICIENCY:	REQUIRED CORRECTIVE ACTION:	EVIDENCE REQUIRED:	PROPOSED COMPLETION DATE:
Records from various stakeholder engagement events were available and demonstrated a clear commitment to engaging with the community. However, RMGC provided limited evidence demonstrating direct involvement and consultation of potentially affected communities in cyanide emergency response planning and limited evidence that emergency response actions associated with accidental cyanide releases have been communicated to affected communities.	RMGC will prepare an article about the emergency response actions associated with accidental cyanide releases and post it in the Valley View, which is a local publication that community members have access to.	Published Valley View article.	September 1, 2026

Standard of Practice 7.3: *Designate appropriate personnel and commit necessary equipment and resources for emergency response.*

Protocol Question 7.3.2: *Has the operation confirmed that external entities with roles and responsibilities identified in the Emergency Response Plan are aware of their involvement and are included as necessary in mock drills or implementation exercises?*

DESCRIPTION OF THE DEFICIENCY:	REQUIRED CORRECTIVE ACTION:	EVIDENCE REQUIRED:	PROPOSED COMPLETION DATE:
While external response organizations have been identified and agreements remain in place, RMGC did not provide documentation demonstrating that external entities identified in the Emergency Action Plan (EAP) participated in drills or implementation exercises during the recertification period.	Invite external response organizations to a future emergency response drill or exercise and complete the drill/exercise.	Documentation that external response organizations have been invited to participate in emergency response drills or exercises.	July 30, 2027

Standard of Practice 7.6: Periodically evaluate response procedures and capabilities and revise them as needed.

Protocol Question 7.6.2: Are mock cyanide emergency drills conducted periodically?

Protocol Question 7.6.3: Are provisions in place to evaluate and revise the Emergency Response Plan, as necessary, following mock drills and following an actual cyanide-related emergency requiring its implementation? Have such evaluations been conducted?

DESCRIPTION OF THE DEFICIENCY: RMGC conducts emergency response training and exercises involving its Emergency Response Team (ERT), including tabletop exercises addressing general emergency scenarios. However, RMGC conducted only one live drill during the recertification period that involved a cyanide-related emergency scenario and that was conducted on July 24, 2026. Although emergency response activities were completed, the operation was unable to demonstrate that cyanide-specific response procedures and capabilities had been periodically tested and evaluated throughout the recertification period. RMGC's Emergency Response Manual requires RMGC to critique the emergency response actions following drills and actual cyanide-related emergencies. However, RMGC did not provide any evidence that evaluations were conducted after the cyanide-related emergencies occurred during the recertification period.	REQUIRED CORRECTIVE ACTION: RMGC conducted a cyanide-related mock drill on July 24, 2026. For future mock drills and after actual cyanide-related emergencies, RMGC will complete an evaluation and document the results of the evaluation.	EVIDENCE REQUIRED: Documentation that an evaluation of the emergency response actions and RMGC's EAP and Emergency Response Manual (ERM) were completed for future drills that are conducted through the proposed completion date.	PROPOSED COMPLETION DATE: July 30, 2027
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