



Submitted to:

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Institute (ICMI)

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and:

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ICMC CERTIFICATION SUMMARY AUDIT REPORT

Kinross Gold Corporation
Round Mountain Gold Corporation

31 August 2026

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Gina Rau

Signature Page

August 31, 2026

ICMC Recertification Summary Audit Report

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).

This summary report has been prepared to meet the requirements and intentions of the International Cyanide Management Institute (ICMI) to demonstrate that following named project has met the obligations in implementing the International Cyanide Management Code (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

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Date of Audit: The Recertification Audit was undertaken over remote sessions and a two-day site visit on May 13-14, 2026.



2. ATTESTION

Auditors' Findings:

	☐	in compliance with	
Round Mountain Gold Corporation is	☒	in substantial compliance with	International Cyanide Management Code
	☐	not in compliance with	

This operation was found in substantial compliance with the Cyanide Code based on the audit findings discussed in this report under the following Standards of Practice: 4.1, 7.2, 7.3, and 7.6.

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, as 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 Auditors.

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

Round Mountain Gold Corporation

Name of facility



Signature of Lead Auditor

August 31, 2026

Date

3. BACKGROUND ON OPERATIONS

The Round Mountain Gold Corporation (RMGC), a wholly owned subsidiary of Kinross Gold Corporation, operates the Round Mountain Mine and Gold Hill Project in Nye County, Nevada. The operation is situated adjacent to the town of Round Mountain and approximately 55 miles north of Tonopah within the Big Smoky Valley, between the Toiyabe and Toquima mountain ranges. The mine operates continuously, with production and processing activities conducted 24 hours per day, seven days per week.

The Round Mountain operation is a large-scale surface gold mine that includes open pit mining, heap leach processing facilities, milling operations, precious metal recovery circuits, a refinery, tailings management facilities, and associated support infrastructure. Gold Hill, located southeast of the Round Mountain Mine, operates as a satellite open pit mining and heap leach facility and is integrated with the overall Round Mountain operation.

Gold recovery at Round Mountain is achieved through a combination of heap leaching and milling processes, depending on ore grade and metallurgical characteristics. Oxide ore is primarily processed through several run-of-mine heap leach facilities where dilute sodium cyanide solution is applied to ore placed on engineered leach pads. Pregnant solution generated during the leaching process is collected through lined solution conveyance systems and routed to precious metal recovery facilities.

The heap leach operation includes the West Dedicated (WDED), South Dedicated (SDED), North Dedicated (NDED), and Reusable Heap Leach Pad areas. Gold-bearing solutions recovered from these facilities are processed through Carbon-in-Column (CIC) and Vertical Carbon-in-Column (VCIC) adsorption circuits and the Adsorption, Desorption, and Regeneration (ADR) Plant where dissolved precious metals are adsorbed onto activated carbon prior to refining.

Higher-grade sulfide ore from the Round Mountain Pit is processed through the milling circuit. Ore is crushed and ground before passing through gravity recovery, flotation, and carbon-in-leach (CIL) processing systems. Gravity and flotation technologies are used to recover a significant portion of the gold before cyanide leaching, thereby reducing the volume of material requiring cyanide treatment. Precious metals dissolved during leaching are adsorbed onto activated carbon and subsequently recovered through the operation's ADR Plant.

Sodium cyanide is delivered to the operation by tanker truck as cyanide solution. The cyanide solution is unloaded through dedicated transfer systems and hoses into on-site cyanide storage tanks, where it is stored prior to distribution to the gold recovery process. Cyanide unloading, storage, and distribution facilities are operated within engineered containment systems designed to prevent releases to the environment.

Following gold recovery, mill tailings are treated using a cyanide destruction process prior to disposal in the tailings storage facility (TSF). This treatment reduces cyanide concentrations in the tailings and is used when needed to comply with operating and environmental requirements before tailings are deposited.

The Gold Hill Project utilizes a dedicated heap leach facility for processing mined ore. Dilute cyanide solution is applied to ore stacked on the heap leach pad, and the resulting pregnant solution is collected and conveyed to the Gold Hill precious metals recovery circuit. Depending on grade and processing requirements, selected ore may also be transported to the Round Mountain processing facilities for treatment.

The cyanide facilities included within the scope of this audit consist of cyanide unloading, storage, and distribution; cyanide application systems associated with the Round Mountain and Gold Hill heap leach operations; milling operations, CIL circuit, the TSF, and ADR Plants; process solution ponds, carbon recovery circuits, and other cyanide-bearing process solution management infrastructure.

The following list identifies the cyanide facilities constructed or modified since the 2023 Recertification Audit:

- RMGC installed a temporary cyanide storage tank to support continued cyanide management activities. The temporary tank was installed within appropriate containment and managed in accordance with site cyanide management requirements.
- RMGC subsequently installed a new permanent cyanide storage tank to replace the original cyanide storage tank and removed the temporary storage tank from service.

Figure 1. Regional Map



4. GOLD MINING VERIFICATION PROTOCOL

4.1 Principle 1 – Production and Purchase

Encourage responsible cyanide manufacturing by purchasing from manufacturers that operate in a safe and environmentally protective manner.

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

FINDING:	BASIS FOR FINDING:
The operation is in full compliance with Standard of Practice 1.1.	RMGC is in full compliance with Standard of Practice 1.1, requiring the operation to purchase cyanide from certified manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide and to prevent releases of cyanide to the environment. RMGC purchased sodium cyanide 30% (nominal) aqueous solution cyanide from Orica Australia Pty Ltd. in Winnemucca during the 2026 Recertification Audit Period. The master purchasing agreement titled <i>Contract for Purchase and Sale of Sodium Cyanide (Liquid)</i> is dated June 13, 2017, and is valid for the "Life of Mine". The auditors reviewed a representative sample of Bills of Lading (BOLs) throughout the Recertification Audit Period to confirm that RGMC purchased the sodium cyanide solely from the Orica Winnemucca cyanide production facility. The Orica Winnemucca facility originally became a signatory to the Code November 3, 2005 and was recertified March 2, 2026.



4.2 Principle 2 – Transportation

Protect Communities and the Environment during Cyanide Transport

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

FINDING:

The operation is in full compliance with Standard of Practice 2.1.

BASIS FOR FINDING:

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

RMGC maintains the BOLS for sodium cyanide delivered. The BOLs confirm that only TransWood Inc. transported sodium cyanide to RMGC from the Orica Winnemucca cyanide production facility. TransWood Inc. originally became a signatory to the Code June 22, 2006 and was recertified November 12, 2025.



4.3 Principle 3 – Handling and Storage

Protect Workers and the Environment during Cyanide Handling and Storage

Standard of Practice 3.1: *Design and construct unloading, storage and mixing facilities consistent with sound accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.*

FINDING:

The operation is in full compliance with Standard of Practice 3.1.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 3.1, requiring cyanide unloading and storage facilities to be designed and constructed consistent with sound, accepted engineering practices, quality control and quality assurance procedures, and spill prevention and containment measures.

RMGC receives liquid sodium cyanide solution and therefore does not operate cyanide mixing facilities for solid cyanide. Auditor observations and interviews confirmed that RMGC's cyanide unloading and storage facilities continue to be maintained and operated consistent with their original design. During the recertification period, a temporary cyanide storage tank was utilized while an existing storage tank was replaced. The temporary installation was inspected prior to use and operated with level indication and high-level alarm systems to prevent overfilling. At the time of the site inspection, the replacement cyanide storage tank had been installed and was in service.

The auditor observed that cyanide unloading and storage facilities are located within restricted access areas separated from public access and routinely occupied work areas. No perennial surface water is present on the RMGC site. The closest dry wash is located one or more miles from the RMGC cyanide unloading and storage facilities. Cyanide unloading stations and storage tanks are constructed on concrete and high-density polyethylene (HDPE) lined containment systems designed to minimize seepage and contain potential releases. Cyanide storage tanks are equipped with level indicators, high-level alarms, and operating procedures to prevent overfilling. Secondary containment structures were observed to be in good condition and constructed of materials compatible with cyanide solution. Cyanide storage areas were secured, adequately separated from incompatible materials, and operated in a manner that minimizes the potential for releases to workers or the environment.

Standard of Practice 3.2: *Operate unloading storage and mixing facilities using inspections, preventative maintenance, and contingency plans to prevent or contain releases and control and respond to worker exposures.*

FINDING:

The operation is in full compliance with Standard of Practice 3.2.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 3.2, requiring unloading and storage facilities to be operated using inspections, preventative maintenance, and contingency plans to prevent or contain releases and control and respond to worker exposures.

RMGC receives liquid sodium cyanide by tanker truck and has implemented the *Offloading Chemicals to Bulk Storage Standard Operating Procedure (SOP)* to govern cyanide unloading activities. Auditor observations of completed Bulk Chemical Delivery Reports and interviews with operations personnel and the cyanide transporter confirmed that responsibilities for unloading activities are clearly defined and consistently implemented. RMGC personnel conduct inspections of unloading areas and equipment prior to unloading, while the transporter is responsible for operating and inspecting the delivery truck, hoses, valves, and associated transfer equipment.



Standard of Practice 3.2: *Operate unloading storage and mixing facilities using inspections, preventative maintenance, and contingency plans to prevent or contain releases and control and respond to worker exposures.*

	The auditor observed a cyanide offloading event during the site inspection and verified that unloading activities were conducted in accordance with site procedures. Required personal protective equipment is specified in the <i>Offloading Chemicals to Bulk Storage SOP</i> and verified prior to unloading, unloading activities are monitored by RMGC personnel, and procedures are in place to address emergency shutdowns, spills, releases, and worker exposures. Dripless fittings, catchment systems, and containment features are used to minimize releases during hose connection and disconnection, and unloading areas are inspected and cleaned following cyanide deliveries. RMGC has established and implemented preventive maintenance and inspection programs for cyanide storage tanks, piping, valves, hoses, and associated equipment. Personnel interviewed during the audit demonstrated an understanding of unloading procedures, release prevention measures, emergency response actions, and controls used to protect workers and the environment during cyanide handling activities. RMGC receives pre-mixed liquid sodium cyanide that contains a colorant added by the supplier and does not conduct cyanide mixing activities on site.
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4.4 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.*

FINDING:

The operation is in substantial compliance with Standard of Practice 4.1.

BASIS FOR FINDING:

RMGC is in substantial compliance with Standard 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 audit team verified that RMGC has developed and implemented management and operating systems for its cyanide facilities designed to protect human health and the environment. The evaluation included document review, interviews with personnel responsible for operations, maintenance, and environmental management, and observations conducted during the site inspection.

RMGC has developed and implemented management and operating systems for its cyanide facilities, including written operating procedures, inspection programs, preventive maintenance activities, contingency planning measures, and a formal Management of Change (MOC) process. The MOC procedure requires appropriately qualified personnel to evaluate proposed cyanide-related process changes, including consideration of safety, health, environmental, operational, and regulatory impacts prior to implementation. The audit verified that procedures are in place for RMGC, inspection, monitoring, maintenance, and management of cyanide facilities, including heap leach pads, process ponds, ADR facilities, mill processing circuits, the tailings storage facility, cyanide storage systems, and associated piping and containment systems.

RMGC has identified the design criteria, operating parameters, and regulatory requirements applicable to its cyanide facilities through Water Pollution Control Permits, Industrial Artificial Pond Permits, Fluid Management Plans, and operating procedures. Inspection and monitoring activities are conducted at established frequencies and documented through inspection forms, operator reports, workplace examinations, and electronic systems. Based on document review, interviews, and field observations, the auditors observed that RMGC conducts inspections of cyanide facilities at established frequencies sufficient to ensure and document that facilities are functioning within their design parameters. Inspection records include the items the inspectors are to observe, the date of the inspection, the name of the inspector, any observed deficiencies, and corrective measures if applicable. Preventive maintenance activities are managed through the J.D. Edwards system and include scheduled inspections, calibrations, testing, and maintenance of equipment critical to cyanide management. The auditors verified that RMGC has incorporated contingency measures for abnormal operating conditions, temporary cessations of operation, and emergency power interruptions.

RMGC has evaluated changes affecting cyanide facilities; however, the use of a temporary cyanide storage tank was not evaluated under RMGC's MOC process prior to implementation. RMGC has developed and implemented management and operating systems for its cyanide facilities, including written operating procedures, inspection programs, preventive maintenance activities, contingency planning measures, and a formal Management of Change (MOC) process. These measures demonstrate a good-faith effort to comply with Standard of Practice 4.1. Not implementing the MOC process to fully review the proposed change prevents RMGC from fully demonstrating conformance with the requirements of this Standard of Practice. The deficiency is readily correctable and does not present an immediate or substantial risk to



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.*

	workers, the public, or the environment. Therefore, RMGC is considered to be in substantial compliance with Standard of Practice 4.1.
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Standard of Practice 4.2: *Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.*

FINDING:

The operation is in full compliance with Standard of Practice 4.2.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 4.2, requiring management and operating systems to be implemented to minimize cyanide use and thereby limit cyanide concentrations in mill tailings.

RMGC has established procedures and monitoring programs to evaluate cyanide consumption and optimize cyanide addition rates within the milling circuit. In accordance with the *Titrate for Cyanide SOP*, cyanide concentrations are routinely measured in the leach circuit and results are used to adjust cyanide addition rates to maintain target concentrations necessary for effective gold recovery while minimizing cyanide usage.

The auditor reviewed the *Titrate for Cyanide SOP*, representative sampling of completed *Leach/CIL Operator Reports*, and interviewed operations personnel. The review confirmed that cyanide titrations are conducted at the required frequency, cyanide addition rates are adjusted based on operating conditions and assay results, and records are maintained to demonstrate ongoing management of cyanide consumption in the milling process.

Standard of Practice 4.3: *Implement a comprehensive water management program to protect against unintentional releases.*

FINDING:

The operation is in full compliance with Standard of Practice 4.3.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 4.3, requiring the implementation of a comprehensive water management program to protect against unintentional releases.

RMGC maintains comprehensive probabilistic water balance models for both the Round Mountain Mine and Gold Hill Project (GHP). The models are updated quarterly using current operational and meteorological data and are reviewed by RMGC, Forte Dynamics, and Kinross personnel. The models incorporate site facilities and operating conditions, including heap leach pads, process ponds, the Mill, tailings storage facility (TSF), ADR Plants, solution application rates, ore placement, precipitation, evaporation, entrainment, seepage recovery systems, reclaim water systems, and operational water demands.

The auditor reviewed water balance documentation, Fluid Management Plans, Water Pollution Control Permits, and inspection records, and interviewed responsible personnel. The review confirmed that the water balance models evaluate appropriate operating and environmental factors, including storm events, power outage scenarios, pond and impoundment storage capacities, and facility operating inventories. Berms, diversion channels, and facility design features have been incorporated to prevent run-on from upgradient watersheds and support management of extreme precipitation events.

RMGC operates its heap leach facilities and TSF as zero-discharge systems and maintains operating criteria intended to preserve adequate freeboard and storage capacity. Process personnel conduct routine inspections of ponds, impoundments, and TSF facilities, while environmental personnel perform periodic oversight inspections and review



Standard of Practice 4.3: *Implement a comprehensive water management program to protect against unintentional releases.*

	water balance results. Weather stations located at the Round Mountain and Gold Hill facilities provide precipitation and evaporation data that are incorporated into the quarterly water balance updates. Auditor observations and record reviews confirmed that RMGC continues to use the water balance models and associated inspection and monitoring programs to manage solution inventories and prevent unintentional releases.
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Standard of Practice 4.4: *Implement measures to protect birds, other wildlife, and livestock from adverse effects of cyanide process solutions.*

FINDING:

The operation is in full compliance with Standard of Practice 4.4.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 4.4; implement measures to protect birds, other wildlife, and livestock from adverse effects of cyanide process solutions.

RMGC has implemented measures to protect birds, wildlife, and livestock from adverse effects of cyanide process solutions. RMGC utilizes fencing, pond covers, netting, perforated pipe covered with crushed rock, bird deterrent devices, and wildlife protection procedures to restrict access to cyanide-bearing solutions. Monitoring records reviewed during the recertification period demonstrated that weak acid dissociable (WAD) cyanide concentrations in tailings and reclaim water remained below applicable limits. Wildlife mortality events are documented, reported, investigated, and corrective actions are implemented to reduce the potential for recurrence. In addition, RMGC applies barren solution to heap leach pads using methods designed to minimize ponding and overspray, conducts routine inspections for ponding conditions, and implements corrective actions when required. Review of monitoring records, wildlife mortality reports, operating records, interviews, and auditor observations confirmed that RMGC has implemented and maintained measures designed to protect birds, wildlife, and livestock from adverse effects of cyanide process solutions.

Standard of Practice 4.5: *Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.*

FINDING:

The operation is in full compliance with Standard of Practice 4.5.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 4.5; implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

RMGC operates their process facilities as zero discharge and do not discharge directly or indirectly to surface water. No perennial streams or other natural water bodies are located within the mine boundary; therefore, RMGC is not required to conduct surface water monitoring.

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

FINDING:

The operation is in full compliance with Standard of Practice 4.6.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 4.6, requiring the implementation of measures to manage seepage from cyanide facilities and protect the beneficial uses of groundwater.

RMGC has implemented engineering and operational controls to prevent and detect seepage from cyanide facilities. RMGC's heap leach pads, process ponds, solution channels, sumps, cyanide unloading facilities, mill facilities, and

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

tailings storage facility are constructed with liner systems, secondary containment, leak detection systems, and seepage collection systems appropriate to the facility design. Groundwater monitoring wells have been installed downgradient of process facilities and are sampled on a routine basis to evaluate groundwater quality and detect potential cyanide releases.

The auditor reviewed groundwater monitoring reports, interviewed environmental personnel, and inspected cyanide facilities during the site visit. The review confirmed that quarterly groundwater monitoring is conducted in accordance with permit requirements and that analytical results are routinely submitted to the Nevada Division of Environmental Protection (NDEP). During the recertification period, WAD cyanide was not detected in groundwater monitoring wells at concentrations above analytical detection limits, which are below the applicable Nevada groundwater standard. Auditor observations and record reviews confirmed that the seepage management and monitoring systems remain operational and effective in protecting groundwater resources.

RMGC does not utilize mill tailings as underground backfill. In addition, groundwater monitoring results indicate that cyanide concentrations have not exceeded levels protective of beneficial uses; therefore, remedial activities for cyanide impacts to groundwater have not been required during the recertification period.

Standard of Practice 4.7: *Provide spill prevention or containment measures for process tanks and pipelines.*

FINDING:

The operation is in full compliance with Standard of Practice 4.7.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 4.7, requiring spill prevention and containment measures for cyanide process tanks and pipelines.

RMGC has provided secondary containment for cyanide unloading and storage facilities, process tanks, carbon adsorption circuits, process ponds, and associated cyanide facilities throughout the Round Mountain and Gold Hill operations. The auditor observed that containment systems remain in good condition and continue to be operated consistently with their design. During the recertification period, the cyanide storage tank at the SDED Plant was replaced with a tank of equivalent capacity, and the existing secondary containment system remains adequately sized to contain the required design volume, including allowances for precipitation events.

The auditor verified that process facilities are equipped with concrete containment structures, lined containment areas, collection trenches, sumps, vaults, and drainage systems designed to capture and return spilled solution to the process circuit. Procedures have been established for the inspection, management, and removal of liquids collected within secondary containment areas, and containment systems were observed to be free of materials that would reduce their available storage capacity. All cyanide process tanks were observed to be provided with secondary containment and no tanks without secondary containment were identified during the audit.

RMGC has also implemented spill prevention and containment measures for cyanide solution pipelines. Cyanide-bearing pipelines are located within concrete containment areas, lined channels, HDPE-lined trenches, pipe-in-pipe systems, or other engineered containment systems designed to collect leaks and prevent releases to the environment. Leak detection systems are installed at selected locations, including pipeline corridors and buried pipeline segments, and are routinely monitored. Auditor observations confirmed that cyanide process pipelines and associated containment systems were maintained in good condition and provide effective protection against releases.

The auditor further verified that cyanide tanks, piping, and process equipment are constructed of materials compatible with cyanide service and high-pH operating conditions, including carbon steel, stainless steel, and HDPE. No surface



Standard of Practice 4.7: *Provide spill prevention or containment measures for process tanks and pipelines.*

	waters are present within the mine permit boundary requiring special protection measures associated with cyanide pipelines. Overall, the containment, leak detection, and spill prevention measures implemented by RMGC were found to be effective in minimizing the potential for releases from cyanide process tanks and pipelines.
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Standard of Practice 4.8: *Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.*

FINDING:

The operation is in full compliance with Standard of Practice 4.8.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 4.8, requiring the implementation of quality assurance and quality control (QA/QC) procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

The auditor confirmed QA/QC documentation, engineering records, and records of construction for cyanide facilities constructed or modified during previous and current audit recertification periods are available. Available documentation demonstrated that RMGC utilizes qualified personnel and engineering review processes for cyanide facility construction and modification projects.

During the recertification period, RMGC replaced the cyanide storage tank at the SDED facility. The tank was observed to be installed, operational, and incorporated into an existing secondary containment system. RMGC provided QA/QC documentation demonstrating that the installation was constructed in accordance with accepted engineering standards and specifications.

QA/QC documentation and construction records for cyanide facilities constructed or modified prior to the current recertification period were reviewed and found acceptable during previous certification and recertification audits. No additional cyanide facility construction occurred during the current recertification period.

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

FINDING:

The operation is in full compliance with Standard of Practice 4.9.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 4.9, requiring the implementation of monitoring programs to evaluate the effects of cyanide use on wildlife and surface and groundwater quality.

RMGC has established monitoring programs and written procedures within its Environmental Management and Procedures Manual (EMPM) and associated standard operating procedures to govern wildlife, groundwater, leak detection, and process area monitoring activities. Monitoring requirements, inspection frequencies, sample collection methods, analytical parameters, sample preservation techniques, chain of custody requirements, and quality assurance/quality control measures are documented and implemented by qualified environmental personnel.

The auditor reviewed the EMPM, environmental inspection procedures, quality assurance and quality control requirements, compliance checklists, and monitoring records, and interviewed environmental personnel responsible for program implementation. The review confirmed that sampling protocols were developed by appropriately qualified personnel and include requirements for field documentation, sample handling, preservation, laboratory analysis, and data quality verification. Samples are analyzed by certified laboratories using established analytical methods.



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

RMGC conducts monitoring of groundwater, wildlife management, leak detection systems, and process solutions at frequencies established by regulatory requirements and site monitoring programs. Monitoring data are documented, reviewed, and maintained by the Environmental Department to identify changes in environmental conditions and evaluate the effectiveness of cyanide management controls. Auditor review of monitoring records and site observations confirmed that the monitoring programs are implemented as designed and provide ongoing evaluation of potential impacts from cyanide use to wildlife and water resources.

Based on document review, interviews with environmental personnel, and review of monitoring records, the auditors observed that monitoring is conducted at frequencies adequate to characterize the media being monitored and identify changes in environmental conditions in a timely manner.



4.5 Principle 5 – Decommissioning

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

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

FINDING:

The operation is in full compliance with Standard of Practice 5.1.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 5.1, requiring the development and implementation of procedures for the effective decommissioning of cyanide facilities to protect human health, wildlife, livestock, and the environment.

RMGC has developed and maintains closure and reclamation plans that address the decommissioning of cyanide facilities associated with the Round Mountain operation. The plans have been prepared in accordance with applicable federal and state regulatory requirements and include measures for the closure of heap leach facilities, process solution ponds, collection systems, process equipment, and other cyanide-related infrastructure.

The auditor reviewed RMGC's closure planning documentation and confirmed that the plans include implementation schedules, reclamation activities, monitoring requirements, and closure performance objectives. The closure schedule identifies major reclamation and decommissioning activities, including process fluid stabilization.

RMGC reviews and updates its closure and reclamation plans on a periodic basis in accordance with regulatory requirements and operational changes. Records reviewed during the audit confirmed that the plans are revised as necessary to reflect current site conditions and regulatory commitments, ensuring that decommissioning measures remain appropriate throughout the life of the operation.

Standard of Practice 5.2: *Establish a financial assurance mechanism capable of fully funding cyanide related decommissioning activities.*

FINDING:

The operation is in full compliance with Standard of Practice 5.2.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 5.2, requiring the establishment of a financial assurance mechanism capable of fully funding cyanide-related decommissioning activities.

RMGC has developed a cost estimate for closure and reclamation activities associated with the operation, including cyanide-related decommissioning requirements identified in the site's closure and reclamation plans. RMGC utilizes the Standardized Reclamation Cost Estimator (SRCE) process to estimate closure liabilities and calculate costs associated with the decommissioning and reclamation of cyanide facilities and related infrastructure. The closure cost estimate, including cyanide-related decommissioning activities, is based on third-party implementation of closure and reclamation measures.

The auditor verified that the closure cost estimate is reviewed and updated periodically to reflect operational changes, revisions to closure planning assumptions, and regulatory requirements. The closure cost estimate is subject to regulatory oversight.

RMGC has established a financial assurance mechanism approved by the applicable regulatory authorities to cover the estimated costs of closure and reclamation, including cyanide-related decommissioning activities. The approved financial assurance consists of surety bonds covering the estimated closure liability of the operation. Documentation reviewed during the audit confirmed that the financial assurance mechanism remains in place and provides funding sufficient to support implementation of the site's cyanide-related decommissioning obligations.



4.6 Principle 6 – Worker Safety

Protect Workers' Health and Safety from Exposure to Cyanide

Standard of Practice 6.1: *Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.*

FINDING:

The operation is in full compliance with Standard of Practice 6.1.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 6.1, requiring that the operation identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce, and control worker exposure.

RMGC has developed and implemented procedures that address cyanide-related tasks and potential worker exposure scenarios, including cyanide unloading, work around process ponds and solution conveyance systems, confined space entry, maintenance activities, and equipment decontamination.

The auditor reviewed applicable procedures and observed cyanide unloading activities during the site inspection. Interviews with operations personnel and the cyanide delivery driver confirmed that personnel understand their responsibilities, required controls, emergency response actions, and cyanide handling requirements.

RMGC's procedures identify required personal protective equipment, pre-task inspections, area access controls, communication requirements, and safe work practices for cyanide-related activities. Site procedures also require inspections of unloading equipment, cyanide delivery vehicles, emergency equipment, eyewash stations, and safety showers prior to unloading activities. Additional controls are specified for work around ponds, sumps, ditches, and other cyanide facilities where exposure hazards may be present.

The auditor observed that cyanide-related work activities were performed in accordance with established procedures and that appropriate controls were implemented to minimize worker exposure. Interviews conducted during the audit indicated that workers are encouraged to provide input into health and safety procedures through pre-shift meetings, direct discussions with supervisors, departmental health and safety representatives, Miners' Representatives, Human Resources representatives, and QR code reporting mechanisms. Employees reported that they are comfortable raising safety concerns and providing suggestions for continual improvement of health and safety programs.

Standard of Practice 6.2: *Operate and monitor cyanide facilities to protect workers' health and safety and periodically evaluate the effectiveness of health and safety measures.*

FINDING:

The operation is in full compliance with Standard of Practice 6.2.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 6.2 requiring that the site operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

RMGC has implemented measures to protect worker health and safety during cyanide management activities and periodically evaluates the effectiveness of those measures. RMGC maintains operating parameters intended to limit the formation of hydrogen cyanide gas and conducts routine monitoring of process solution pH in cyanide process areas. Fixed and portable HCN monitoring systems are used to monitor atmospheric conditions and verify that worker exposures remain below established limits. Fixed HCN monitors are configured with initial alarm setpoints of 4.5 or 4.7 ppm, depending on the monitor measurement increment, and high-level alarm setpoints of 10 ppm. Portable Altair 5X monitors are configured with alarm setpoints of 4.5 ppm and 10 ppm. Personnel are trained to evaluate conditions and



Standard of Practice 6.2: *Operate and monitor cyanide facilities to protect workers' health and safety and periodically evaluate the effectiveness of health and safety measures.*

	take appropriate precautions when initial alarms activate and to evacuate affected areas when high-level alarms occur. Documentation reviewed during the audit demonstrated that HCN monitoring equipment is maintained, tested, and calibrated in accordance with site requirements and manufacturer recommendations. Warning signs identifying cyanide hazards, prohibited activities, and required precautions have been installed throughout cyanide management areas. High-strength cyanide solution received at RMGC is dyed red for identification purposes, and cyanide tanks and piping are labeled to identify their contents. Safety Data Sheets, operating procedures, first aid information, and other cyanide safety information are available to workers through the site computer network. Emergency response equipment, including safety showers, eyewash stations, and dry powder fire extinguishers, is installed throughout cyanide handling, storage, unloading, and processing areas and is routinely inspected and maintained. RMGC has also established procedures for reporting, investigating, and evaluating incidents and potential cyanide exposures. Incident investigation records reviewed during the recertification period included cyanide exposure and cyanide release events, which were documented, investigated, and addressed in accordance with site procedures. Interviews, document review, and field observations confirmed that RMGC routinely evaluates cyanide-related incidents and exposure events to identify corrective actions and improve worker health and safety performance.
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Standard of Practice 6.3: *Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.*

FINDING:

The operation is in full compliance with Standard of Practice 6.3.

BASIS FOR FINDING:

RMPC is in full compliance with Standard of Practice 6.3 which requires that the site develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

RMGC has developed and implemented emergency response plans and procedures for responding to worker exposure to cyanide. RMGC maintains emergency response equipment, including oxygen equipment, resuscitation equipment, antidote kits, radios, cellular telephones, and emergency medical supplies at cyanide unloading, storage, and processing areas. Inspection records reviewed during the audit demonstrated that emergency response equipment, medical supplies, oxygen equipment, and cyanide antidote kits are routinely inspected and maintained in a state of readiness.

Written procedures for responding to cyanide exposure incidents are maintained through the Emergency Action Plan (EAP) and Cyanide Safety SOP. These procedures include response actions for inhalation, ingestion, and absorption exposures, decontamination requirements, and first aid measures. RMGC maintains an onsite clinic staffed by qualified medical personnel and an Emergency Response Team (ERT) capable of providing immediate medical assistance, including administration of Cyanokit (hydroxocobalamin) under medical direction.

RMGC has established arrangements for obtaining offsite medical treatment through regional medical facilities and maintains a reciprocal aid agreement to support emergency transport when required. Interviews with clinic personnel, safety personnel, and emergency response personnel, together with document review and field observations, confirmed that emergency response equipment, trained personnel, communication systems, medical resources, and written response procedures are in place to support effective response to potential cyanide exposure incidents.



4.7 Principle 7 – Emergency Response

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

Standard of Practice 7.1: *Prepare detailed emergency response plans for potential cyanide releases.*

FINDING:

The operation is in full compliance with Standard of Practice 7.1.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 7.1 which requires that the site prepare detailed emergency response plans for potential cyanide releases.

RMGC has developed and implemented an EAP, an Emergency Response Manual (ERM), and Cyanide Safety SOP that address many potential cyanide release and exposure scenarios, including transportation accidents, fires and explosions, overtopping of ponds, power outages, pump failures, uncontrolled seepage, failures of tailings impoundments and heap leach facilities, releases during cyanide unloading, pipe, valve and tank failures, and failure of cyanide treatment/destruction systems. RMGC maintains emergency response procedures and personnel demonstrated understanding of emergency response actions, the emergency planning documentation addresses the release scenarios required by this Standard of Practice.

The EAP and Cyanide Safety SOP include specific response actions for cyanide release and exposure scenarios, including evacuation of affected areas, identification and control of the release source, use of cyanide antidotes and first aid equipment, implementation of containment and cleanup measures, and investigation of incidents to support corrective actions and updates to emergency response procedures.

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

FINDING:

The operation is in substantial compliance with Standard of Practice 7.2.

BASIS FOR FINDING:

RMGC is in substantial compliance with Standard of Practice 7.2, which requires the involvement of site personnel and stakeholders in the planning process.

RMGC has involved site personnel and external entities, including emergency responders, medical providers, Nye County Emergency Services, and other agencies in elements of cyanide emergency planning and preparedness. Internal personnel provide input through ERT training, drills, and debrief activities. RMGC also maintains community engagement mechanisms through meetings, newsletters, outreach activities, and stakeholder forums.

RMGC has established an Awareness and Preparedness for Emergencies at Local Level (APELL) Memorandum of Understanding and a Reciprocal Aid Agreement with Nye County to support emergency response planning and resource sharing. Local emergency response agencies have been involved in the cyanide emergency planning process, and RMGC maintains periodic communication with hospitals in Fallon and Reno regarding treatment of potential cyanide exposure patients.

RMGC has demonstrated a good-faith effort to comply with Standard of Practice 7.2 through involvement of site personnel, emergency responders, medical providers, Nye County Emergency Services, and other external stakeholders in cyanide emergency planning and preparedness activities. However, RMGC provided limited evidence



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

	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. The identified deficiency is readily correctable and does not present an immediate or substantial risk to workers, the public, or the environment. Therefore, RMGC is considered to be in substantial compliance with Standard of Practice 7.2
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Standard of Practice 7.3: *Designate appropriate personnel and commit necessary equipment and resources for emergency response.*

FINDING:

The operation is in substantial compliance with Standard of Practice 7.3.

BASIS FOR FINDING:

RMGC is in substantial compliance with Standard of Practice 7.3 which requires that the site designate appropriate personnel and commit necessary equipment and resources for emergency response.

RMGC has designated personnel and committed equipment and resources necessary to support cyanide emergency response. The EAP identifies emergency response responsibilities, call-out procedures, contact information, equipment, training requirements, and the roles of internal and external responders. RMGC maintains an ERT, conducts routine training, and performs inspections of emergency response equipment and medical resources. RMGC also maintains agreements with Nye County Emergency Services and local medical facilities to support emergency response activities. External response organizations have been identified and agreements remain in place; however, RMGC did not provide documentation demonstrating that external entities identified in the EAP participated in drills or implementation exercises during the recertification period. RMGC has designated personnel and committed equipment and resources necessary to support cyanide emergency response, maintains agreements with external emergency response organizations and medical providers, and conducts routine emergency response training and equipment inspections. Collectively, these measures demonstrate a good-faith effort to comply with Standard of Practice 7.3. The deficiency is readily correctable and does not present an immediate or substantial risk to workers, the public, or the environment. Therefore, RMGC is considered to be in substantial compliance with Standard of Practice 7.3

Standard of Practice 7.4: *Develop procedures for internal and external emergency notification and reporting.*

FINDING:

The operation is in full compliance with Standard of Practice 7.4.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 7.4, which requires the site to develop procedures for internal and external emergency notification and reporting.

The audit team verified that RMGC has established procedures for internal and external emergency notification and reporting through the EAP, ERM, and the EMPM. The evaluation included document review, interviews with site personnel, and review of incident reporting records.

RMGC's Crisis Management Plan establishes procedures for communication with potentially affected communities and the media during cyanide-related emergencies. Communications are managed by the Crisis Management Team under the direction of the General Manager, and the Plan includes the contact information necessary to complete required notifications and external communications.

The EAP includes procedures and contact information for notifying site management, security personnel, the ERT, and regulatory agencies in the event of a cyanide-related emergency. The ERM includes the contact information for local community members and emergency services, including hospitals and air transport services. In addition, the EMPM Spill



Standard of Practice 7.4: Develop procedures for internal and external emergency notification and reporting.

	Response Procedures identify notification requirements and responsible parties for reporting cyanide and other chemical spills. The audit also verified that RMGC has established procedures for notifying ICMI of significant cyanide incidents consistent with the definitions and reporting requirements of the Cyanide Code. Site procedures identify the types of incidents requiring notification, and auditors reviewed records demonstrating that RMGC notified ICMI regarding a potential cyanide exposure event on April 7, 2026.
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Standard of Practice 7.5: Incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

FINDING:

The operation is in full compliance with Standard of Practice 7.5.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 7.5, which requires the site to incorporate remediation measures and monitoring elements into response plans that account for the additional hazards of using cyanide treatment chemicals.

The audit team verified that RMGC has incorporated remediation measures and environmental monitoring requirements into its emergency response planning through the EAP and the EMPM. The evaluation included document review and interviews with site personnel responsible for environmental management.

Site procedures address the recovery and neutralization of cyanide contaminated materials and identify appropriate response actions for cyanide releases. Contaminated soil and other impacted media are either removed and placed on an active heap leach pad or neutralized in accordance with site procedures. The EMPM includes requirements for managing and disposing of clean up materials and specifies responsibilities for assessing affected areas and directing remediation activities.

The audit verified that RMGC has established monitoring requirements to evaluate the effectiveness of remediation efforts following a cyanide release. Procedures require coordination with the Nevada Division of Environmental Protection (NDEP) to assess affected areas and conduct soil sampling as necessary to confirm that residual cyanide concentrations have been reduced to acceptable levels. The Environmental Department is responsible for overseeing sampling activities and directing additional remediation when monitoring results indicate further action is required.

The EMPM addresses the use of bleach or sodium hypochlorite for treatment of cyanide contaminated soils when appropriate. In addition, RMGC has evaluated the potential need for alternative drinking water supplies and confirmed that measures are available to provide potable water should such a need arise.

Review of site procedures and interviews with personnel confirmed that remediation measures, monitoring requirements, and controls associated with cyanide treatment chemicals have been incorporated into the site's emergency response planning consistent with the requirements of Standard of Practice 7.5.

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

FINDING:**BASIS FOR FINDING:**

RMGC is in substantial compliance with Standard of Practice 7.6, which requires the site to periodically evaluate response procedures and capabilities and revise them as needed.



The operation is in substantial compliance with Standard of Practice 7.6.	The audit team verified that RMGC's EAP and ERM are reviewed periodically. RMGC conducts emergency response training and exercises involving its ERT, including tabletop exercises addressing general emergency scenarios. However, RMGC only conducted one live drill during the recertification period that involved a cyanide-related emergency scenario instead of once each calendar year as stated in ICMI's Mining Guidance. Although emergency response activities were completed, RMGC was unable to demonstrate that cyanide-specific response procedures and capabilities had been periodically tested and evaluated as required by Standard of Practice 7.6. RMGC has demonstrated a good-faith effort to comply with Standard of Practice 7.6 through periodic review of its EAP and ERM, emergency response training, tabletop exercises, and completion of a cyanide-related emergency drill during the recertification period. However, RMGC only conducted one mock cyanide drill during the recertification period and was not able to demonstrate that RMGC evaluated its emergency response actions after the drill or the actual cyanide emergencies that occurred during the audit recertification period. The identified deficiency is readily correctable and does not present an immediate or substantial risk to workers, the public, or the environment. Therefore, RMGC is considered to be in substantial compliance with Standard of Practice 7.6.
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4.8 Principle 8 – Training

Train Workers and Emergency Response Personnel to Manage Cyanide in a Safe and Environmentally Protective Manner

Standard of Practice 8.1: *Train workers to understand the hazards associated with cyanide use.*

FINDING:

The operation is in full compliance with Standard of Practice 8.1.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 8.1, requiring that workers be trained to understand the hazards associated with cyanide use.

RMGC provides cyanide hazard awareness training to employees, contractors, and other personnel who may encounter cyanide in the workplace. The auditor reviewed training materials, training records, awareness presentations, operator qualification checklists, and departmental training requirements. The training programs address cyanide hazards, routes of exposure, signs and symptoms of exposure, first aid measures, emergency response actions, required personal protective equipment, and safe work practices associated with cyanide management.

Personnel assigned to cyanide-related work areas receive task-specific training before performing work independently. In addition to general cyanide awareness training, operators receive area-specific and on-the-job training related to their assigned duties. Contractors working in operational areas receive a site tour and cyanide hazard awareness training appropriate to the areas in which they will work. Interviews with employees and supervisors confirmed personnel demonstrated an understanding of cyanide hazards and the controls implemented to prevent exposures.

RMGC conducts annual refresher training to reinforce cyanide hazard awareness and maintains records documenting completion of training activities. The auditor reviewed representative training records, sign-off forms, competency evaluations, and electronic training records and confirmed that training documentation is retained and available to demonstrate completion of required cyanide awareness training.

Standard of Practice 8.2: *Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community, and the environment.*

FINDING:

The operation is in full compliance with Standard of Practice 8.2.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 8.2, requiring that appropriate personnel be trained to operate cyanide management facilities according to systems and procedures that protect human health, the community, and the environment.

RMGC has established training programs for personnel involved in cyanide management activities that combine classroom instruction, review of standard operating procedures, competency evaluations, and supervised on-the-job training. The auditor reviewed a representative sampling of training records, qualification documentation, and training materials and confirmed that employees receive training appropriate to their assigned duties before performing cyanide-related tasks independently.

Task-specific training is provided by qualified and experienced personnel, including supervisors, trainers, and experienced operators. Employees are trained on the operating procedures, equipment, hazards, controls, and emergency response actions applicable to their work areas. New employees complete structured training programs and demonstrate proficiency through written assessments, practical demonstrations, supervisor observation, and completion of checklists before being authorized to work independently.



Standard of Practice 8.2: *Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community, and the environment.*

	RMGC provides periodic refresher training to ensure personnel maintain the knowledge and skills necessary to safely perform cyanide-related work. The auditor reviewed evidence of annual cyanide refresher training, competency assessments, and training records from the recertification period. Interviews with employees, trainers, and supervisors confirmed personnel understand the requirements and responsibilities associated with their assigned cyanide management activities. Training records are maintained electronically and include documentation of training completion, training dates, subjects covered, employee participation, and demonstration of competency. The auditor reviewed a representative sampling of training records and verified that RMGC maintains sufficient documentation to demonstrate that personnel responsible for cyanide management activities are appropriately trained and qualified to perform their duties.
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Standard of Practice 8.3: *Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.*

FINDING:

The operation is in full compliance with Standard of Practice 8.3.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 8.3, requiring appropriate workers and emergency response personnel to be trained to respond to worker exposures and environmental releases of cyanide.

RMGC provides training for employees who may respond to cyanide incidents, including cyanide exposure recognition, first aid measures, decontamination procedures, spill response actions, emergency communications, and environmental release response requirements. The auditor reviewed training materials, training records, emergency response documentation, and interviewed operations personnel, trainers, and ERT members. The review confirmed that personnel responsible for cyanide unloading, operations, maintenance, and emergency response receive training appropriate to their roles and responsibilities.

RMGC maintains a trained ERT that receives initial and ongoing training in emergency response topics including cardiopulmonary resuscitation (CPR)/automated external defibrillator (AED), hazardous materials response, spill response, cyanide decontamination procedures, HAZMAT response, first aid, and the use of emergency response equipment. Training records and interviews confirmed that ERT members participate in scheduled drills, monthly training activities, and refresher training designed to maintain emergency response competency. Personnel interviewed during the audit demonstrated an understanding of cyanide exposure symptoms, emergency response protocols, and the use of cyanide emergency equipment.

RMGC coordinates emergency preparedness activities with external response organizations and medical providers through mutual aid agreements, emergency planning activities, and periodic communication regarding cyanide-related emergencies. The auditor reviewed documentation and interviewed personnel regarding coordination with local emergency responders and medical facilities and confirmed that these organizations are familiar with RMGC's emergency response requirements and available response capabilities.

Refresher training is conducted regularly for emergency response personnel and employees who work in cyanide management areas. Training records are maintained documenting the names of participants and trainers, training dates, topics covered, and successful completion of training requirements, including written assessments and practical demonstrations where applicable. The auditor reviewed a representative sample of training records from the recertification period and verified that documentation is sufficient to demonstrate that personnel receive the training necessary to respond effectively to worker exposures and environmental releases of cyanide.



4.9 Principle 9 – Dialogue and Disclosure

Engage in Public Consultation and Disclosure

Standard of Practice 9.1: *Promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns.*

FINDING:

The operation is in full compliance with Standard of Practice 9.1.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 9.1 which requires the site to promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns.

RMGC promotes dialogue with stakeholders regarding cyanide management through community meetings, public information sharing, and established grievance mechanisms. RMGC routinely meets with the communities of Round Mountain, Tonopah, Duckwater, and Teanna to provide updates on site activities and to allow community members to ask questions or raise concerns. RMGC has also established a Community Advisory Committee that meets quarterly to share information and obtain feedback from local community representatives.

Information regarding RMGC's commitment to the International Cyanide Management Code is made available to the public, including through materials displayed at the Round Mountain General Store. RMGC has implemented a grievance process that provides community members and other external stakeholders with multiple avenues for submitting concerns, including telephone and email communication. Documentation reviewed during the audit demonstrated that RMGC provides information regarding the grievance process and how concerns are received, documented, and addressed.

Interviews with Community Relations personnel and review of stakeholder engagement and grievance process documentation confirmed that RMGC actively communicates with stakeholders regarding cyanide management practices and has mechanisms in place to receive and address concerns raised by external parties. No grievances related to cyanide management were reported during the recertification period.

Standard of Practice 9.2: *Make appropriate operational and environmental information regarding cyanide available to stakeholders.*

FINDING:

The operation is in full compliance with Standard of Practice 9.2.

BASIS FOR FINDING:

RMGC is in full compliance with Standard of Practice 9.2 which requires that the site make appropriate operational and environmental information regarding cyanide available to stakeholders.

RMGC makes information regarding its cyanide management practices available to stakeholders through community meetings, public outreach activities, and publicly available written materials. RMGC conducts routine community meetings and Community Advisory Committee meetings that provide opportunities for community members to obtain information regarding site activities and ask questions regarding cyanide use and management. RMGC also conducts community outreach and educational activities, including presentations at local schools and site tours that discuss mining operations and the use of cyanide in the recovery process.

Information regarding cyanide-related worker hospitalization incidents is made publicly available through applicable regulatory reporting requirements, including MSHA reporting requirements and other applicable regulatory reporting and agency notification processes. Information regarding significant worker health and safety incidents is also disclosed through Kinross' publicly available ESG and sustainability reporting.

Written information describing RMGC's cyanide management practices is publicly available through Kinross publications and the company's website. Documentation reviewed during the audit included the Kinross 2024 Sustainability Report and



Standard of Practice 9.2: *Make appropriate operational and environmental information regarding cyanide available to stakeholders.*

information available through the Kinross website describing the company's approach to cyanide management. Interviews with Community Relations personnel confirmed that these resources are available to stakeholders and community members.

RMGC also makes operational and environmental information available to stakeholders through regulatory reporting, sustainability reporting, and publicly available website resources. RMGC reports incidents and environmental information in accordance with applicable regulatory requirements, including Nevada Division of Environmental Protection reporting obligations. Information regarding reportable spills, incidents, environmental performance, and sustainability initiatives is available through Kinross's Environmental, Social and Governance (ESG) website resources and Sustainability Reports. Interviews and documentation reviewed during the audit confirmed that RMGC provides stakeholders with access to information regarding cyanide management and publicly discloses applicable operational and environmental information.



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