

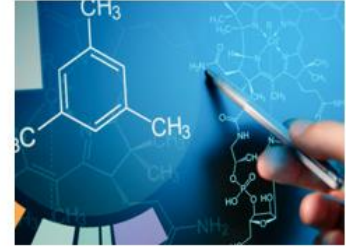
ICMI Cyanide Code Gold Mining

Summary Audit Report

Kinross Gold Corporation

Round Mountain Gold Corporation – Smoky Valley Common Operation

2022 Re-Certification Audit



KINROSS

Submitted to:

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



www.mss-team.com

Company Information:

Name of Mine and Location:	Round Mountain Gold Corporation – Smoky Valley Common Operation Round Mountain, Nevada – USA
Name of Mine Owner:	Kinross Gold Corporation
Name of Mine Operator:	Round Mountain Gold Corporation (RMGC)
Name of Responsible Manager:	Neil Jensen Round Mountain Gold Corporation #1 Smoky Valley Mine Road / P.O. Box 480 Round Mountain, Nevada 89045 Email: neil.jensen@kinross.com

Location Detail and Description of Operation:

Round Mountain Gold Corporation (RMGC) operates the Smoky Valley Common Operation (SVCO) and Gold Hill Project (GHP). RMGC is located near the Town of Round Mountain and approximately 45 miles northeast of Tonopah, Nevada, between the Toiyabe and Toiyabe mountain ranges in the Big Smoky Valley (Figure 1). SVCO consists of the Round Mountain open pit, run-of-mine heap leach and milling operations, and a refinery. GHP is an open pit mine, run-of-mine heap leach operation, and a refinery. RMGC operates 24-hours per day, 7-days per week.

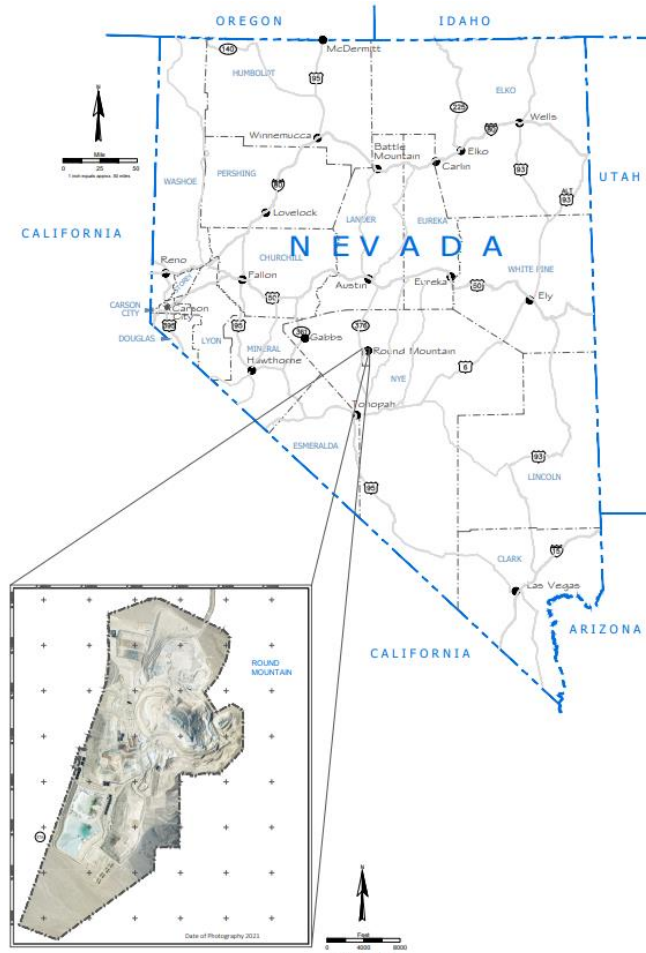
The SVCO heap leach operations process run-of-mine oxide ores from the Round Mountain pit in four areas: West Dedicated (WDED), South Dedicated (SDED), and North Dedicated (NDED) heap leach pads, and a Reusable Heap Leach Pad. NDED is the newest area and became operational during the previous recertification period. Ore on the leach pads is leached by applying a dilute sodium cyanide solution across the surface of the leach pads or by using solution wells that apply solution at specific, targeted depths. The solution wells leach areas that have not been effectively leached in the past. Pregnant leach solution flows downgradient along the pad liners and is collected in solution collection ditches located along the lowest edge of each pad. Solution in the ditches is channeled to the associated processing plant or pumping station. Gold and silver are recovered from the pregnant leach solution in Carbon-in-Column (CIC) and Vertical Carbon-in-Column (VCIC) circuits and the Adsorption, Desorption, and Regeneration (ADR) Plant.

Round Mountain
Name of Operation

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April 6, 2023
Date

Figure 1: RMGC Location



Higher grade sulfide ore from the Round Mountain Pit is processed in the SVCO milling operation. The ore is crushed to less than six inches before being fed into the Mill. The Mill circuit consists of a semi-autogenous grinding (SAG) mill, pebble crusher, screens, spiral concentrators, cleaning tables, thickeners, a regrind mill, cyanide, and carbon-in-leach (CIL) agitated leaching tanks, reagent handling, and a cyanide neutralization circuit.

Round Mountain
Name of Operation

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Signature of Lead Auditor

April 6, 2023
Date

Gold and gold-bearing minerals liberated in the SAG mill circuit are recovered by gravity and flotation circuits. These circuits significantly reduce the amount of material requiring cyanide leaching to about 3 - 4 % of the total mill feed. A gross gold concentrate is produced by the gravity circuit with the gravity tails being processed by froth flotation. The flotation concentrate is then combined with the coarse gold processing circuit tails and then processed in a CIL cyanide circuit. Activated carbon in the CIL circuit adsorbs the precious metals as they are liberated from the leach slurry. The carbon is screened from the slurry and sent to the ADR Plant for further processing. An INCO process cyanide neutralization circuit using ammonium bisulfite and copper sulfate destroys the cyanide in the leached tailings solution to a point that is safe for wildlife. The leach circuit tailings are combined with the gravity circuit tailings and then pumped to the tailings impoundment.

The majority of Gold Hill ore is placed on a dedicated heap leach pad and gold is recovered from leach solutions in an onsite precious metal recovery circuit (the ADR Plant). Depending upon grade, some ore may be trucked to SVCO for processing in the Mill. On the Gold Hill Dedicated Heap Leach Pad, ore is leached by applying a dilute solution of sodium cyanide that percolates through the heap dissolving gold and silver into solution. The resulting pregnant solution flows downgradient along the pad liners and is collected in solution collection ditches located along the lowest edge of the pad. Pregnant solution from the leach pad is routed via a piping system directly to the ADR Plant, which consists of a CIC circuit, or to a process pond for temporary storage.

Round Mountain
Name of Operation

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April 6, 2023
Date

Auditor's Finding

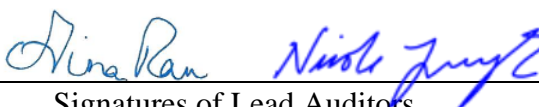
This operation is in FULL COMPLIANCE with the International Cyanide Management Code.

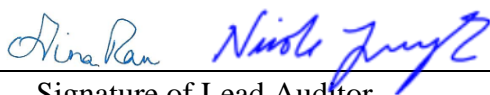
The operation experienced two “significant cyanide incidents”, as defined by International Cyanide Management Institute (ICMI) during the previous three-year audit cycle which are discussed in this report under Standard of Practice 7.4. RMGC did not experience any compliance issues since the previous audit.

Audit Company:	MSS Code Certification Service, a Division of: Management System Solutions, Inc. www.mss-team.com
Lead / Mining Technical Auditor:	Gina Rau E-mail: gina.rau@mss-team.com
Project Lead / Co- Lead Auditor:	Nicole Jurczyk E-mail: njurczyk@mss-team.com
Date(s) of Audit:	October 17-20, 2022

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 Mining Operations Verification Protocol* and using standard and accepted practices for health, safety, and environmental audits.

Round Mountain Mine		April 6, 2023
Name of Operation	Signatures of Lead Auditors	Date

Round Mountain		April 6, 2023
Name of Operation	Signature of Lead Auditor	Date

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

Standard of Practice

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Round Mountain Gold Corporation (RMGC) purchases 30% sodium cyanide solution from the Cyanco Company, LLC. The master purchasing agreement titled *Contract for Purchase and Sale of Sodium Cyanide (Liquid)* is dated June 13, 2017 and is valid for the “Life of Mine”. Attachment 10 to Schedule A requires that each part of the supply chain, consisting of the Cyanco Winnemucca, Nevada (NV) Plant and the transporter, TransWood Inc. (TransWood) is to be certified in full compliance under the International Cyanide Management Code (the “Code”).

Based on review of a representative sample of Bills of Lading (BOLs), RMGC has purchased cyanide solely from the Cyanco Winnemucca plant during the recertification period. Cyanco is a signatory to the Code and has been recertified as compliant under the Code. The Cyanco Winnemucca plant was certified originally as Code compliant on October 11, 2006 and was most recently certified on December 19, 2019.

Round Mountain
Name of Operation

Aina Pan Nishi Jung
Signature of Lead Auditors

April 6, 2023
Date

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

Standards of Practice

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

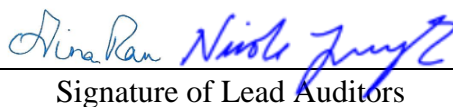
The operation is: in full compliance
 in substantial compliance
 not in compliance...with Standard of Practice 2.1.

Discuss the basis for the Finding/Deficiencies Identified:

RMGC maintains the BOLs for cyanide deliveries in their Warehouse. Based on review of a representative sample of BOLs, RMGC maintains the BOLs for cyanide delivered to RMGC during the recertification period. The BOLs clearly identify that the cyanide was obtained from the Cyanco Winnemucca, NV plant and transported to site by TransWood.

Based on review of a representative sample of BOLs, cyanide was transported to RMGC solely by TransWood during the recertification period. TransWood is a signatory to the Code and has been recertified as compliant under the Code. TransWood was certified originally as Code compliant on October 11, 2006, and was most recently certified on December 10, 2019.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

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

Standards of Practice

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

- The operation is: in full compliance
 in substantial compliance
 not in compliance...with Standard of Practice 3.1.

Discuss the basis for this Finding/Deficiencies Identified:

RMGC has designed and constructed cyanide unloading and storing facilities in accordance with sound and accepted engineering practices as reported in previous Cyanide Code Audit Reports. No changes have been made to the unloading and storage facilities since the previous Cyanide Code recertification audit. Record of Construction Reports for these facilities were available, but the actual designs and specifications were not reviewed during the 2022 Recertification Audit since the findings of the initial Certification Audit and subsequent recertification audits are considered valid.

RMGC only receives liquid sodium cyanide solution and therefore, does not have cyanide mixing facilities for solid cyanide. The auditor inspected RMGC's cyanide unloading and storage facilities and observed them to be in good condition during the 2022 Recertification Audit.

To minimize human exposure during cyanide unloading, cyanide unloading facilities are located outdoors. RMGC hangs barriers across the access roads to the unloading areas to create an exclusion zone that prevents personnel from driving into or entering an area during an unloading event. In addition, cones with signs warning personnel that a cyanide offload event is in progress, and they are not to enter the area are placed in front of doors that lead from the inside of the plants into a cyanide exclusion zone during the entire unloading event. The auditor observed the barriers and placement of the cones during the site inspection.

Cyanide unloading and storage facilities are located away from offices and frequented work areas or in areas with restricted access.

No towns or houses are in the immediate vicinity of the unloading/storage areas. The subdivision of Hadley is located approximately 3 miles to the west-southwest. The town of

Round Mountain
Name of Operation

Aina Pan Nishi Jung
Signature of Lead Auditors

April 6, 2023
Date

Carvers is approximately 6.5 miles northwest of RMGC. The Town of Round Mountain is 2 miles from the nearest unloading /storage facility.

RMGC is in an arid region with an average annual precipitation of approximately 6.5 inches. No perennial surface water is present on the RMGC site; only water flows from large storm events or rapid snowmelt conditions may appear in dry washes on the RMGC site. A baseline reconnaissance of springs, seeps, and streams within the vicinity of the mine site was conducted during late August 1994 (Hydro-Search, Inc., 1994). From this inventory, no surface waterways were identified within a 1-mile radius of the permitted mine process facilities.

RMGC only receives liquid sodium cyanide solution and therefore, does not have cyanide mixing facilities for solid cyanide.

RMGC has not made any changes to the six cyanide unloading areas since the previous recertification audit. All six cyanide unloading areas are constructed of concrete and the concrete slabs were observed to be in good condition, thereby, minimizing seepage to the subsurface.

The concrete slab for each of the six cyanide unloading areas are surrounded by a curb that will contain any leakage from a cyanide delivery truck. The slabs are sloped to a low point that allows the cyanide to be recovered or to drain to a process pond where the cyanide combines with process solutions.

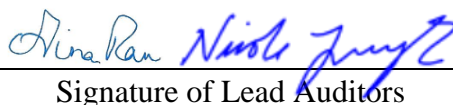
RMGC uses level indicators, high-level alarms, and procedural controls to ensure that the cyanide storage tanks are not overfilled. Level indicators have been installed on all cyanide storage tanks with digital readouts at the unloading area and on the computer in the control rooms. The auditor observed the tank levels at the storage tank areas and in the control room screens to verify that the level indicators were functioning.

Each tank is equipped with a siren and flashing light that are activated if the tank level reaches the high-level setpoint. The high-level alarms (i.e., the siren and flashing light) are tested prior to each time cyanide is offloaded and are tested on a monthly preventive maintenance schedule.

RMGC has not made any modifications to the cyanide storage tank containment areas since the previous recertification audit. The secondary containment structures for the cyanide storage tanks are constructed of concrete and/or HDPE liner, which provide a competent barrier to leakage. The auditor observed that the concrete containment surfaces were in good condition and cracks were grouted and sealed. The visible portions of the HDPE-lined containments areas were also in good condition.

All cyanide storage tanks are located outside in well-ventilated areas with minimal potential for hydrogen cyanide (HCN) gas build-up.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

All cyanide storage tanks are located within the fenced and restricted access mine property. Additional security areas with badge access only are located within the mine property and were found to be appropriate for the operation. Access to the mine property is through an access-controlled gate that is monitored 24 hours per day, 7 days per week by security personnel.

Based on observations during the site inspection, all cyanide storage tanks are in locations that are separate from incompatible materials stored in warehouses or other chemical storage areas. The auditor did not observe any other chemicals being stored near or in the secondary containment areas for the cyanide storage tanks. Observed practices indicate that there is no opportunity for the cyanide to mix with other chemicals during a release event.

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.

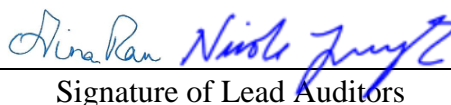
Discuss the basis for this Finding/Deficiencies Identified:

RMGC only receives liquid cyanide in tanker trucks. The transporter (TransWood) driver offloads the cyanide from the tanker trucks into RMGC's cyanide storage tanks and then returns the truck to the cyanide supplier (Cyanco). The tanker trucks are not left at RMGC and RMGC cannot reuse the tanker trucks for any other purpose. No cyanide drums, bags, containers, or liners are used at the site.

Based on an interview with a TransWood driver and an RMGC operator during the site inspection, the TransWood driver is responsible for cleaning any cyanide residue present on the tanker truck valves, hoses, and connections and for closing all valves on the tanker truck and the valve on the unloading line that leads to the cyanide storage tanks. Once the driver has closed the valves, disconnected the transfer hose, cleaned the area of any cyanide residues, and provided an 'all clear' to the operator, the operator inspects the unloading area and documents on the *Bulk Chemical Delivery Report* that residues/accumulations have been cleaned.

Dripless discharge fittings are used in conjunction with "Ergo Brackets" installed on the quick-release couplings on the feed lines to the cyanide storage tanks. The Ergo Brackets provide a hose support and a catchment trough that collects any drips when connecting or disconnecting hoses to the storage tank feed lines. The auditor observed the catchment

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

troughs in the six unloading areas at RMGC and found them to be in good condition and free of cyanide salt deposits.

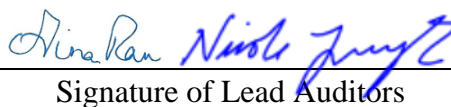
The *Offloading Chemicals to Bulk Storage* procedure requires RMGC operators to complete a work area inspection and offloading equipment inspection with the delivery truck driver and to note any equipment deficiencies on the *Bulk Chemical Delivery Report*. This includes a visual inspection of the unloading area and equipment and the hose on the cyanide delivery truck. The RMGC operator only removes the lock from the valve on the cyanide storage tank feed line. The TransWood driver is responsible for uncapping the quick-release coupling on the cyanide storage tank feed line, connecting the hose, and opening and closing the valves on the feed line.

RMGC only receives cyanide in a 30% sodium cyanide (NaCN) solution in tanker trucks. No cyanide containers are handled, and mixing is not required.

RMGC operators verify that TransWood drivers are wearing the required personal protective equipment (PPE) and record this on the *Bulk Chemical Delivery Report*. RMGC operators directly observe the TransWood driver from outside the exclusion zone while the driver attaches the transfer hose, opens the valves, and begins the cyanide transfer. Once the cyanide transfer is complete, the TransWood driver notifies the RMGC operator, and the operator observes the driver disconnecting and returning the transfer hose to the delivery truck. During the transfer, operators either directly observe the driver by standing outside the exclusion area or observe remotely via video.

RMGC only receives liquid cyanide solution that has had the colorant dye added by Cyanco at their Winnemucca production facility. This practice was confirmed through interviews and a review of records at the site.

Round Mountain
Name of Operation



Signature of Lead Auditors

April 6, 2023
Date

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:

RMGC has developed and implemented written management and operating plans and procedures for all cyanide facilities including unloading, storage facilities, process plants, heap leach operations, tailings facilities, and cyanide treatment, regeneration, and disposal systems. The operation also has plans and permits that are used to safely manage operations and comply with requirements.

To verify compliance, the auditor reviewed standard operating procedures (SOPs), interviewed operations personnel, and completed a site inspection for evidence of implementation.

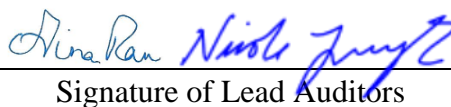
The Water Pollution Control Permits (WPCPs) issued by the Nevada Division of Environmental Protection (NDEP), the Fluid Management Plans that RMGC has developed, and the mine's SOPs identify the assumptions and parameters incorporated into the facility's design and identify the applicable regulatory requirements.

Parameters identified in the WPCPs for preventing or controlling cyanide releases and exposures include solution application rates to minimize and eliminate ponding on the heap leach pad; maximum height of the heap leach pads; leak detection sump rates; capacity, freeboard requirement, and the design storm event for the tailings storage facility (TSF) and process and event ponds; and solution well specifications and placement. RMGC operates their event ponds as normally empty.

The *Fluid Management Plans* included in the WPCP renewal applications for Round Mountain Mine (dated March 14, 2022) and GHP (dated May 26, 2021) provide freeboard requirements for all ponds and the TSF under normal and unusual operating conditions.

The Industrial Artificial Pond Permits (IAPPs) issued by the Nevada Department of Wildlife (NDOW) provide the operating requirements for impoundments containing materials,

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

compounds, or chemicals that cause or could cause the death of wildlife. The permits list the measures that RMGC must take to prevent wildlife from gaining access to such materials or requires RMGC to render the materials harmless to wildlife. Measures listed include fencing, covering/containment, chemical neutralization or isolation, and wildlife monitoring.

RMGC has developed SOPs and plans that define the procedures and responsibilities for compliance with the Code, including inspection and preventive maintenance requirements. The WPCPs specify the regulatory requirements for cyanide process solution management and monitoring/sampling of process solution, surface water, and groundwater.

RMGC has also developed and implemented inspection and preventive maintenance programs which includes practices for safe and environmentally sound operation of their cyanide facilities. RMGC continues to use a computer-based system for identifying, assigning responsibility, scheduling, and tracking the completion of the preventive maintenance activities. The system identifies future activities for regular preventive maintenance and includes information on the task requirements and completion. The preventive maintenance program includes elements necessary for cyanide safety (i.e., HCN and pH monitors, cyanide salt inspection, and back-up generators).

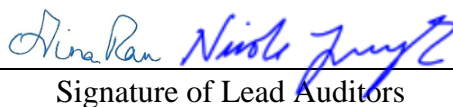
Process personnel conduct routine inspections of the Mill, tailings pipeline, the TSF, reclaim and seepage channels, collection ponds, and the heap leach areas, including the pads, pond systems, and process plants. Inspections are documented on either hard copy forms or electronically in iAuditor or Inteltrac software management systems that allow operators to record inspections results into a mobile phone or iPad.

Records were reviewed for the recertification period and they demonstrate that inspections are completed as scheduled and procedures are in place to inspect and monitor the operations to ensure that facilities are operated in a safe and environmentally sound manner. In addition, the auditor observed the site to be well maintained.

The Environmental Department conducts formal weekly inspections of the Mill, process plants, TSF, leach pads, channels, sumps, containments and ponds, and wildlife protection measures and observations. These inspections are recorded on the *Environmental Department Weekly Site Inspection Form*. The Reusable Leach Pad's electric leak detection system is monitored twice a month. In addition, preventive maintenance is done once a year by a contractor to maintain the system's effectiveness and cleanliness and is documented in an annual report.

RMGC has a formal written procedure entitled *Management of Change (MOC)* within their *Health and Safety Management System* to manage changes to the facility. The MOC procedure requires that appropriately qualified personnel evaluate all proposed process changes (including cyanide-related process changes) and modifications prior to the implementation of the changes or modifications. The documented procedure calls for safety, health, and environmental impact evaluation and a fully signed MOC authorization form to

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

be available prior to the implementation of the change or modification. The MOC form was reviewed and found to be acceptable. MOC records were reviewed as described below. The MOC procedure, implemented process, and employee awareness of the need to evaluate cyanide-related changes and modifications for potential safety, health, and environmental impacts prior to the change or modification being implemented were all found to be acceptable by the auditor.

Two cyanide related MOCs have been initiated since the previous Cyanide Code recertification audit. One MOC was initiated in September 2021 for using cyanide briquettes by dissolving them in the delivery truck and then pumping the solution to the existing cyanide storage tanks. This initiative was placed on hold due to supply chain issues. The second MOC was for discontinuing the use of amyl nitrite for the treatment of cyanide exposure and removing amyl nitrite from cyanide antidote kits. This change will leave hydroxocobalamin as the sole antidote on site, which can be administered by the advanced Emergency Medical Technicians (AEMTs), paramedics, and RMGC's clinic staff. This MOC was approved on March 22, 2022; however, this change has not yet been implemented. RMGC is ensuring that this change is effectively communicated to employees and discussed in the annual cyanide safety refresher training so that all employees are aware of this change.

The two RMGC *Fluid Management Plans* contain procedures to address an upset situation in the operation's water balance. The procedures address both "normal operations" and "unusual operations" for each of the process facilities. Corrective action steps are based on available freeboard in the solution ponds and generally involve reducing the fluid volume in the ponds to prevent overflowing. This is primarily achieved through the transfer of solution to the event ponds to take advantage of the pond storage capacities as a system.

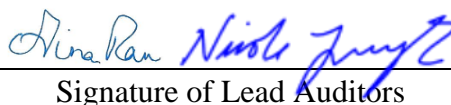
Site personnel conduct a variety of inspections on RMGC's cyanide facilities. These inspections are documented on inspection forms. These forms include space for personnel to note deficiencies or problems observed during the inspection. Items requiring attention are addressed by process personnel or by the maintenance personnel through the work order system.

The *Fluid Management Plans* address temporary closures where needed. Permanent closure, or cessation of operations, is addressed in the *Tentative Plan for Permanent Closure for the Round Mountain Mine* as required by the NDEP.

Based on discussions with the operators and review of completed inspections and unloading checklists, inspections are completed. Records were found to be complete and in alignment with Code requirements.

Secondary concrete containments are inspected daily for integrity damage, cracking, presence of fluid in containment volume, and available capacity. Secondary containments were observed during the audit as being in good condition.

Round Mountain
Name of Operation



Signature of Lead Auditors

April 6, 2023
Date

Leak detection systems are installed in the process ponds, heap leach pads, and solution collection channels. RMGC inspects the leak detection sumps for the heap leach pads on a weekly basis in accordance with RMGC's two WPCPs. The Reusable Pad's electric leak detection system is monitored twice a month and the Mill Reclaim Pipe leak detection port is monitored quarterly. Examples of inspections and the quarterly reports for the recertification period were available for review during the audit and were found to be complete.

Pipelines, pumps, and valves are inspected as part of the operations shift inspections. Records from these inspections were reviewed during the audit and were found to be acceptable.

Daily monitoring of pond and TSF levels is completed to ensure that water levels do not exceed defined operating limits, including a minimum 2-foot freeboard limit. The Environmental Department inspects the condition of the surface diversions around the ponds, where installed, on a weekly basis and documents this inspection on the *Environmental Department Weekly Site Inspection Form*. Records were available to demonstrate that freeboard and additional operating parameters were met during the recertification period.

Based on review of a representative sampling of inspection records, the auditor observed that RMGC inspects its cyanide facilities on an established frequency that is sufficient to ensure and document that they are functioning within design parameters. The inspections are completed on a shift, daily, weekly, monthly, or quarterly basis. These inspections cover the mill process equipment, secondary containment areas, cyanide addition, solution pipelines, the TSF, heap leach pads and associated circuits, process and event ponds, and the cyanide unloading/storage facilities.

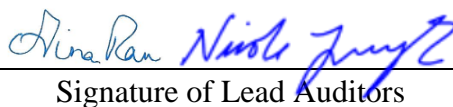
RMGC documents their inspections on checklists, daily reports, and specific inspection forms. Inspection results are documented either on hard copy forms or electronically in iAuditor or Inteletrac. Inspection records for the recertification period were available for review during the audit.

The checklists, reports, and forms included the items the inspectors are to observe, the date of inspection, the name of the inspector, and any observed deficiencies.

Corrective measures were noted directly on the inspection records when deficiencies were observed. The auditor reviewed a sampling of completed inspection records for the recertification period and confirmed that the records fulfilled the Code requirements and have been retained for the entire recertification period.

RMGC has developed and implemented a preventive maintenance (PM) program to ensure that equipment and devices function as necessary for safe cyanide management. The system

Round Mountain
Name of Operation



Signature of Lead Auditors

April 6, 2023
Date

is designed to document specific planned PM actions for critical equipment as well as unplanned maintenance and the tracking of associated work orders.

A representative sampling of completed PM work orders and calibration records from the recertification period were reviewed and observed to be complete. The work orders include safety instructions that must be initialed by the maintenance personnel performing the work, a parts list, a standard description of the work to be performed, and a place to document the results of calibrations or inspections as applicable.

The system includes an archiving function that allows for the generation of PM history on specific equipment items. A list of completed cyanide PMs for the recertification period was provided for review. RMGC performs preventive maintenance on storage tanks, flow meters, HCN detectors, pumps, piping and associated components, storage tank vents and level indicators/transmitters, and emergency generators.

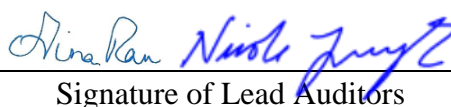
In addition, RMGC maintenance personnel conduct nondestructive testing on the cyanide storage, leach, and CIL tanks and the carbon columns. The testing involves measuring the wall thickness at defined locations. The cyanide storage tanks are tested every 3 to 5 years and the leach and CIL tanks and carbon columns are tested every 3 years. The system issues work orders to complete this testing. The work orders list the tools needed, test frequency, and the procedure for performing the test, which is based on API (American Petroleum Institute) Standard 653. The wall thickness and tank condition are recorded on the work order. Inspection records for the recertification period were available for review during the audit and found to be complete.

RMGC relies principally on excess pond capacity to mitigate unintentional releases of process solution. The pond systems are designed to contain the 100-year, 24-hour storm event (2.50 inches) and 24 hours of drain down from the heap leach pads during an unexpected power outage, while maintaining two feet of freeboard. The seepage collection pond system for the TSF is sized to contain the 100-year, 24-hour storm event, operating inventories, and a 48-hour power loss. Dedicated storage capacity is maintained in the pond systems to meet these design criteria.

As described in the 2019 Recertification Audit report, RMGC has the necessary emergency power resources to operate pumps and other equipment to prevent unintentional releases and exposures in the event its primary source of power is interrupted. Based on discussions with RMGC, RMGC has not modified its primary, secondary, and emergency sources of power or pond capacities since the 2019 Recertification Audit; therefore, the findings of that audit are still valid and summarized below for completeness.

A 230-kilovolt (“KV”) power line provides primary power to the mine. RMGC maintains diesel powered generators to run critical equipment including process solution pumps at the various process areas, in case of a primary power failure. Since the 2016 Cyanide Code

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

recertification audit, an additional backup generator has been installed to provide power to the North Dedicated leach facility.

The Mobile Maintenance group performs preventive maintenance on the generators located at the ADR Plant, NDED Plant and the Mill. The Medium Duty Maintenance group at the Truck Shop performs preventative maintenance on the generators located at Gold Hill. Monthly services include checks of air filters, engine oil, fuel filters, coolant, battery fluid, gauges, fan belts and exhaust systems. Every four to six months, oil changes are performed and electricians support startups. RMGC also maintains the generators according to the manufacturer's recommendations, which require weekly visual inspections and preventative maintenance based on operating hours (e.g., at 250, 500, 2000 and 3000 hours) as well as an annual inspection.

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

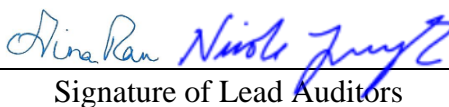
- The operation is: in full compliance
 in substantial compliance
 not in compliance...with Standard of Practice 4.2.

Discuss the basis for this Finding/Deficiencies Identified:

RMGC has implemented a program for determining the appropriate cyanide addition rate in the Mill. Based on discussions with RMGC's Metallurgist, the Metallurgist and Mill Manager review the cyanide concentration data and ore chemistry and determine the optimum cyanide addition rates in order to maximize gold recovery, but also to minimize cyanide usage.

In accordance with the *Titrate Cyanide SOP*, cyanide concentrations are monitored every two hours in Leach Tank #1 and two times per shift in CIL Tank #6 to determine if the targeted cyanide concentration is being achieved in the Mill's leach circuit. The Mill control room operator will adjust the setpoint for the cyanide addition rate based on the results of the titrations. The cyanide titration results are entered into the *Leach/CIL Operator Reports*. A sample of *Leach/CIL Operator Reports* from the recertification period were reviewed and showed that cyanide measurements were taken as required and cyanide addition rates were being maintained.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

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.

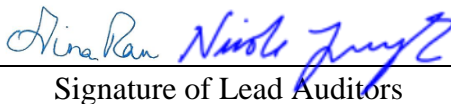
Discuss the basis for the Finding/Deficiencies Identified:

For the recertification period, RMGC continued to use the two GoldSim water balance models that were developed separately for SVCO and GHP. The GoldSim models are comprehensive in that they include the appropriate facilities and processes. They are also probabilistic in that inputs and outputs are distributions rather than single values. These two water balance models were in place during the previous Cyanide Code recertification audit. RMGC uses Forte Dynamics to incorporate changes to the models as needed, such as adding the NDED Plant and ponds to the SVCO model and three evaporators on the Freshwater Pond to the GHP model, and to update the two models on a quarterly basis. RMGC's Environmental Department and Kinross corporate reviews the quarterly water balance results.

During the recertification period, RMGC continued to use and update the SVCO and GHP water balance models. Both RMGC water balance models include the barren solution application rates applied to all heap leach pads. The SVCO water balance model includes solid deposition in the TSF by accounting for the tons of ore milled. RMGC performs quarterly surveys of the TSF Cell B and an annual survey of TSF Cell A to confirm the rate of deposition and TSF capacity in the water balance model. RMGC calculates monthly average application rates in gallons per minute (gpm) and the total tons of ore milled per month and provides that data to Forte Dynamics on a quarterly basis so that Forte Dynamics can update the models.

The Water Balance models allow the user to define a storm event by either selecting the return interval and duration (e.g., 48-hour, 100-year event) or specifying a user-defined magnitude and duration. The user can also specify the date storm event is to occur on or allow the model to generate a precipitation value for that date. RMGC uses the 100-year, 24-hour storm event (2.50 inches for both models) to forecast water management requirements. The pond systems for the heap leach pads are designed to contain the 100-year, 24-hour storm event, plus 24 hours of drain down during a power outage, while maintaining two feet of freeboard. The pond system for the TSF is sized to contain the 100-year, 24-hour storm event, operating inventories, and a 48-hour power loss. Based on observations and interviews during the site inspection, RMGC always maintains storage capacity in the pond systems to meet these design criteria.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

RMGC has two weather stations that measure precipitation. One weather station is located near the Round Mountain Core Shed building and one near the Gold Hill Heap Leach Pad. RMGC collects the data from the Round Mountain weather station. RMGC compiles and sends the weather and operational data to Forte Dynamics who updates the models on a quarterly basis. The models use historical precipitation data from the nearest weather station. RMGC's Environmental Department and Kinross corporate reviews the quarterly water balance results.

RMGC's Environmental Department collects the data from the Round Mountain weather station. This weather station does not include all the instruments needed to calculate pan evaporation, so the RMGC Environmental Department calculates the pan evaporation using regional data and provides the calculated pan evaporation to Forte Dynamics for use in the SVC0 water balance model.

Based on observations and interviews, berms or diversion ditches have been constructed around the perimeter of the heap leach pads, ponds, and the TSF to prevent stormwater runoff from the upgradient watershed from entering the pads or ponds or the facilities have been designed as elevated features. The diversions were designed to control runoff resulting from the 100-year, 24-hour storm event. Therefore, stormwater runoff from upgradient watersheds is not included in the water balance models.

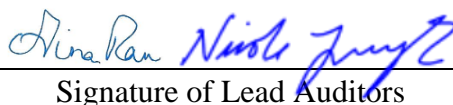
RMGC staff indicated that snowfall occurs during the winter; however, it usually blows away or melts in a short period and does not accumulate. However, frozen leach solutions may accumulate on the heap leach pads and result in increased solution volumes when temperatures increase enough to melt the frozen solution. The GoldSim models account for frozen leach solutions based on application rates and ambient temperatures.

Solution losses due to evaporation, water uptake in the ore on the heap leach pads, and entrainment in the tailings deposited in the TSF are included in the water balance models. Heap leach pads and ponds are lined and operated as zero discharge facilities. The TSF Reclaim Ponds collect seepage that passes through the TSF dam and contain the seepage in the lined collection system. This water is recycled to the Mill with no discharge to the environment. Since the heap leach pads and TSF are operated as zero discharge facilities, the water balance model does not include seepage to the subsurface and discharges to surface water do not occur since surface water is not present within the mine property.

Potential effects of power outages or equipment failures are simulated in the water balance model by turning off pumps (i.e., assign a zero-discharge flowrate). In addition, pumps can be assigned a zero-discharge flowrate during a storm event to simulate a power outage during storm events.

Water balance model information was verified through a review of the water balance input data spreadsheets and the GoldSim water balance models and interviews with the RMGC

Round Mountain
Name of Operation



Signature of Lead Auditors

April 6, 2023
Date

Environmental Department staff. The water balance models were found to be appropriate by the auditor.

The WPCPs require RMGC to operate the ponds and TSF in accordance with the operating plans and facility designs reviewed and approved by NDEP, to contain all process fluids within the fluid management systems, and to not release or discharge any contaminants from the fluid management systems.

Flow rates to and from the leach pads, pond levels, and tailings discharges are compiled and forwarded to the Environmental Department for inclusion in the Water Balance Model. Based on observations and interviews during the site inspection and review of operator shift reports, the ponds and the TSF are operated with low water levels that maximize available storage capacities.

RMGC's two *Fluid Management Plans* that are included in the WPCP renewal applications provide the capacities, operating levels, and freeboard for the heap leach process ponds and TSF and the actions to be taken if certain freeboard levels are reached. Process personnel inspect the ponds and TSF as part of their normal duties. In addition, pond and TSF levels are inspected daily and recorded on the *TSF Process Ponds Daily Inspection Form* and the *Ore Processing Cyanide Area Reports & Data*.

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

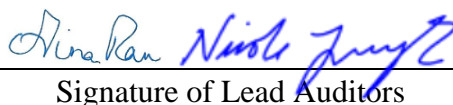
- The operation is: in full compliance
 in substantial compliance
 not in compliance...with Standard of Practice 4.4.

Discuss the basis for the Finding/Deficiencies Identified:

RMGC has implemented operational controls to ensure that wildlife, birds, and livestock do not access open waters where weak acid dissociable (WAD) cyanide exceeds 50 mg/l. The only cyanide facilities with solutions where WAD cyanide levels may exceed 50 mg/l are process solution ponds, collection channels, and temporary ponding of barren solution on a heap leach pad. Tailings from the mill are treated in a cyanide destruct circuit to reduce WAD cyanide concentrations. Based on review of sampling data included in eleven quarterly WPCP reports submitted to NDEP during the recertification period, the WAD cyanide concentrations in the mill tailings have been below 8 mg/L.

RMGC's three Industrial Artificial Pond Permits (S291185, S291394, and S38714) require, and RMGC has installed, 8-foot tall cyclone or chain-link fencing around all ponds and covering on ponds that contain any chemical in concentrations that would be lethal to

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

wildlife. The permits also require chemical neutralization for any ponds that are too large to cover the surface of and/or contain within perimeter fencing. To meet this requirement, RMGC operates a cyanide destruct process to reduce WAD cyanide concentrations in the mill tailings since the TSF has too large of a surface to cover.

Solution ponds are covered with bird balls and surrounded by fencing along the entire perimeter. Heap leach pad collection channels are either covered with framed netting or constructed of perforated pipe covered with crushed rock. Netting is used at overflow containment channels and collection sumps. Bird cannons and Bird-X digital bird repellents are also used as needed.

RMGC routinely inspects for ponding of barren solution on the heap leach pads. When ponding is observed, operators will implement corrective measures to alleviate the ponding, such as turning off the flow of solution to the area and loosening surface soil to increase drainage, or placing framed netting over the ponded areas. In addition, applying barren solution to the heap leach pads through the gravity-fed solution wells reduces the potential for solution ponding.

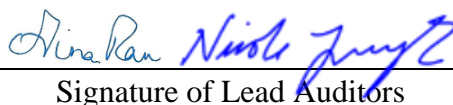
Bird balls were observed to be covering the surface of the process solution ponds, fencing was observed to be in good condition, netting was well maintained, and ponding was minimal and being managed on the pads during the site inspection for this recertification audit.

The TSF and its associated seepage collection channels and reclaim water pond system are the only cyanide facilities that contain open water (i.e., are not covered by bird balls, netting, or perforated pipe covered with crushed rock). RMGC operates a cyanide destruct process to reduce cyanide levels in the mill tailings prior to discharging the tailings to the TSF. Tailings are sampled and cyanide levels are determined every 2 hours at the Cyanide Destruct Tank and cyanide concentrations are documented on the *Leach/CIL Operator Reports*. The Environmental Department also samples the tailings at the Tailing Booster Pump on a quarterly basis. For the 3-year period since the previous recertification audit, the WAD cyanide concentration in the tailings after the cyanide destruct process have been at or below 8 mg/L.

The Environmental Department also samples the reclaim water from the TSF during the first and third quarters each year. WAD cyanide concentrations in the reclaim water for the 3-year period since the previous recertification audit have been at or below 1.4 mg/L.

RMGC personnel are required to report all wildlife mortalities to the Environmental Department. The Environmental Department submits quarterly Wildlife Mortality Reports to NDOW that list all wildlife mortalities and the suspected cause of death. A review of eleven quarterly wildlife reports submitted to NDOW during the recertification period revealed two bird mortalities occurred on the reclaim water ponds (open water) where cyanide concentrations were 10 mg/L and 0.04 mg/L. Both deaths were reported as cyanide related.

Round Mountain
Name of Operation



Signature of Lead Auditors

April 6, 2023
Date

RMGC's efforts to maintain a WAD cyanide concentration of 50 mg/L or less in open waters has been effective in preventing significant wildlife mortalities.

Based on observation of the heap leach pads during the site inspection of this recertification audit, RMGC uses an array of trunk lines, piping headers, emitter tubing, emitters (drip heads) and valves to effectively control where barren leach solution is applied. Emitters are used instead of sprinklers to prevent the overspray of solution off the liners. RMGC also applies barren solution to the heap leach pads through gravity-fed solution wells. Since barren solution is introduced below the surface of the heap leach pads with the solution well application method, the potential for ponding is eliminated.

With the controls of applying the barren solution with these techniques, flying a drone once per week over the heap leach pads, and implementation of the *Pad Walking (Wildlife Protection) SOP*, RMGC applies leach solutions in a manner that avoids significant ponding on the heap leach pads. Minimal ponding was observed during the site inspection.

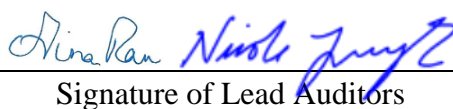
4.5 Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

- 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:

No perennial streams or other natural water bodies are located within the mine permit boundary. In addition, RMGC operates the heap leach operations and TSF as zero discharge processes and does not have indirect discharges to surface waters. RMGC does not discharge to surface waters and therefore does not have any mixing zones.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

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:

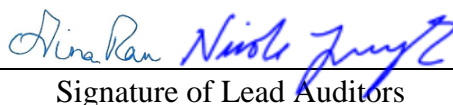
RMGC has implemented measures to protect groundwater beneath and immediately down-gradient of the operation. RMGC installed and samples groundwater monitoring wells and reviews the analytical data to detect if cyanide seepage occurs. RMGC submits the data to NDEP on a quarterly basis.

RMGC's cyanide facilities were designed as zero discharge to both surface water and groundwater and were constructed with impermeable containment systems or liners to prevent seepage. Many of the requirements, along with requirements for operating the facilities, are included in RMGC's two WPCPs. In accordance with these permits, RMGC implements inspection and monitoring programs to ensure water management and leak detection systems are functioning properly, and that water quality is being protected.

RMGC has not modified their groundwater protection measures since the previous Cyanide Code recertification audit report. These measures were observed during the 2022 Recertification Audit and are listed below:

- Synthetically lined pads at the SDED HLP, WDED HLP, NDED HLP, and Gold Hill HLP
- Asphalt-lined reusable pads at the Reusable HLP
- Double-lined solution ponds with leak detection and recovery systems
- Concrete containments and HDPE liners for Mill, ADR, VCIC plants and cyanide unloading facilities
- Single and double-lined event ponds
- Synthetically lined solution channels and sumps
- The TSF embankment foundation is constructed with an HDPE primary liner underlain by a soil liner. An underdrain blanket (i.e., crushed material) with a series of perforated drainage pipes is installed above the primary liner. The full underdrainage system is designed to facilitate collection and drainage of solution from beneath the impoundment. The pipe network drains to the double-lined solution collection channels along the toe of the embankment. The collection channels convey seepage water to the pond system, which consists of three double-lined process ponds and a single-lined event pond.
- The pipeline system conveying tailings from the Mill to the TSF is constructed of HDPE material and contained within a compacted clay channel

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

In accordance with their WPCPs, RMGC is required to conduct quarterly groundwater monitoring in 20 monitoring wells (eleven at SVCO and nine at GHP). The wells are located downgradient of the process facilities and in other various locations around the mine site. Samples are collected from the wells and analyzed for a defined list of parameters, including WAD cyanide. RMGC submits the sampling results to NDEP on a quarterly and annual basis.

The Nevada Groundwater Standard for WAD cyanide is 0.2 mg/l, which is based on the federal drinking water standards. Review of eleven quarterly WPCP reports during the recertification period indicates no detectable WAD cyanide (i.e., <0.01 mg/L) in the groundwater samples. The detection limit is 0.01 mg/L, which is below the numerical standard that applies to RMGC. The beneficial uses of groundwater down-gradient of RMGC's operations include domestic and mining and milling uses. RMGC is an open pit operation with no underground mines.

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.

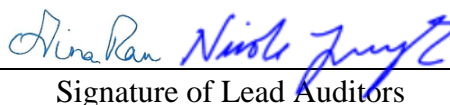
Discuss the basis for the Finding/Deficiencies Identified:

RMGC has provided containment for all cyanide unloading, storage, and process solution tanks sized to hold a volume greater than that of the largest tank within the containment and any piping draining back to the tank, including capacity for a storm event. RMGC does not receive solid cyanide and therefore does not have any cyanide mixing facilities. The spill prevention and containment measures for the cyanide unloading and storage tanks, VCIC/CIC circuits, and process solution tanks were observed to be the same as described in the previous Cyanide Code recertification audit and were in good condition.

No changes or modifications have been made to the secondary containments for the cyanide storage tanks and process tanks or circuits since the previous Cyanide Code recertification audit. The auditor observed the containment areas to be in good condition and did not contain debris or extraneous materials that would reduce their capacity during the site inspection for this recertification audit. As such, the findings and descriptions from the previous recertification audit are still valid.

RMGC has procedures in place to prevent discharges of any cyanide solution or cyanide-contaminated water that is collected in secondary containment areas to the environment. The

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

concrete secondary containments areas at the Mill, ADR Plant, SDED and NDED Plants, and Gold Hill ADR Plant are equipped with floor sumps with dedicated pumps to collect and return cyanide solution or cyanide-contaminated water to the process or transfer the liquids to a process pond. The SOP Draining or Pumping Secondary Containments applies to the removal of any fluids in secondary containment, including precipitation and any fluid that has escaped from a primary container, and states that fluids are to be removed promptly upon discovery. For fluids that are not returned to the process and are to be disposed of, disposal is to proceed as directed by a Department Supervisor and/or the Environmental Department. The auditor observed the secondary containment areas for the cyanide storage tanks, unloading areas, and other outdoor secondary containment areas to be free of liquids during the site inspection.

RMGC has provided spill prevention or containment measures for all cyanide process solution pipelines to collect leaks and prevent releases in accordance with their WPCPs. No changes have been made to the secondary containment measures for the cyanide pipelines since the previous Cyanide Code recertification audit. The auditor observed the spill prevention and containment measures in a number of locations during the site inspection and found them to be in good condition. No surface water is present within the RMGC mine permit boundary.

The auditor observed that RMGC uses carbon steel for cyanide storage tanks and process tanks; carbon steel and HDPE pipelines for process solutions; HDPE pipelines for tailings and reclaim solutions; and stainless steel and carbon steel pipelines for reagent grade cyanide. These materials are compatible with cyanide and high pH conditions.

4.8 Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

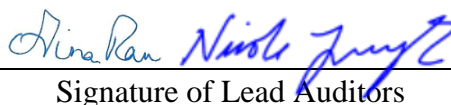
- The operation is: in full compliance
 in substantial compliance
 not in compliance...with Standard of Practice 4.8.

Describe the basis for the Finding/Deficiencies Identified:

RMGC implemented and conducted quality control and quality assurance (QC/QA) programs for the construction and modification of cyanide facilities during the recertification audit period. New construction or modifications to the RMGC cyanide facilities that occurred since the previous Cyanide Code recertification audit include:

- Stage 2 Expansion of the Cell B TSF
- Construction of VCIC 12 at Pond #11 at West Dedicated Heap Leach Pad

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

- Construction of an Interstage Leach Cell Sump – West Dedicated Heap Leach
- East Side Containment Channel for the Gold Hill Heap Leach Pad Expansion – East Side Utilization
- Gold Hill Phase 4 Heap Leach Expansion – northern expansion of the leach pad

Detailed Audit Findings Reports (April 2007, August 2010, January 2014, February 2017, and October 2019) summarize the construction QA/QC documentation for the cyanide facilities that were constructed or modified during those audit time periods.

Documentation of the QC/QA programs are provided in the Record of Construction Reports. These reports were reviewed during this 2022 recertification audit and include, as applicable to the project, engineer inspection reports, photographs, as-built engineering drawings, and laboratory and field-testing records; Atterberg limits, particle size testing, and permeability for soil; compaction test results for the subgrade, compacted fill and clay liner; seam strength, weld, and destruction test results for liner placement; and HDPE fusion logs for HDPE piping. The Record of Construction reports and as-built engineering drawings are signed by Professional Engineers licensed in the State of Nevada.

RMGC has maintained copies of QC/QA documentation related to its cyanide facilities. QC/QA documentation was obtained and reviewed for the construction and modification projects that occurred since the previous Cyanide Code recertification audit.

RMGC retained qualified engineering personnel to perform the QC/QA inspections and reviews during construction of the cyanide installations and to prepare and certify final construction reports. The Record of Construction reports generated since the previous Cyanide Code recertification audit provide evidence that qualified personnel reviewed the construction or modification of the cyanide facilities, and the facilities were built according to approved designs. Record of Construction Reports for the new construction and modifications have been reviewed and stamped by a Professional Engineer licensed in the state of Nevada. In addition, the Record of Construction reports are submitted to NDEP, Bureau of Mining Regulation and Reclamation (BMRR) for review and approval.

Based on observations of QC/QA documentation during the site visit, QC/QA documentation has been maintained and is available for the construction and modifications of cyanide facilities at RMGC.

Round Mountain
Name of Operation

Aina Pan Nishi Jung
Signature of Lead Auditors

April 6, 2023
Date

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.

Describe the basis for the Finding/Deficiencies Identified:

RMGC's *Environmental Management and Procedures Manual (EMPM)* (dated August 2022) provides written standard procedures for monitoring activities. The relevant sections include: Section 18.0 – *Wildlife Management*, which includes information on wildlife inspections and mortality management; Section 19.0 – *Quality Assurance and Quality Control Plan*, which provides instruction on how environmental samples will be gathered to ensure the data is appropriate for its intended use; Section 20.0 – *Sampling Protocol*, which includes a groundwater and soil sampling protocols, decontamination of sampling equipment, and a detailed *SOP for Collection of Water Samples*; and, Section 21.0 – *Water Monitoring Compliance Checklist* provides a comprehensive list of monitoring requirements that are contained in RMGC's two WPCPs. This checklist also includes the monitoring requirements for the electronic leak detection system at the Reusable Heap Leach Pad and the leak detection port for the Mill reclaim water line.

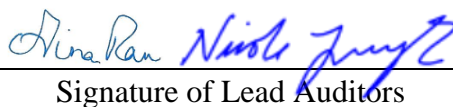
Based on discussions with RMGC's Environmental Engineer, all sampling and analytical protocols were developed by appropriately qualified environmental professionals in RMGC's Environmental Department.

RMGC's monitoring requirements are detailed in various sections of the EMPM. The EMPM lists monitoring site locations and defines sampling and reporting frequencies (Section 21). The *SOP for Collection of Water Samples* (Section 20 in the EMPM) describes sample labelling, preservation, storage, field measurements, sample handling and shipping, equipment decontamination, and chain of custody procedures. Quality control procedures for sampling are addressed in Section 19 in the EMPM. RMGC's WPCPs require analysis for WAD cyanide.

Sampling procedures are documented in the *Round Mountain Gold Corporation Monitoring Plan*. The *Monitoring Plan* includes a *Ground Water Sampling Protocol* and a *Standard Operating Procedure for Collection of Water Samples*. RMGC's Environmental Department uses *Well Field Sheets* to document the date, time, and conditions when collecting water samples along field parameters, including pH, conductivity, and water temperature.

In the opinion of the audit team, RMGC conducts monitoring at frequencies adequate to characterize and identify changes in a timely manner in the groundwater, leak detection

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

systems, and process solutions. In addition, the monitoring frequencies have been established by the NDEP in the RMGC's two WPCPs.

Groundwater samples are collected and analyzed, and leak detection systems are monitored on frequencies specified in the WPCPs. Wildlife monitoring is continuous while employees are outside on the property and observations are documented. Cyanide concentrations in process solutions are monitored at least daily and, in many cases, several times per day.

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

Standards of Practice

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

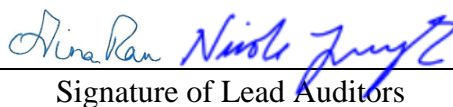
- The operation is: in full compliance
 in substantial compliance
 not in compliance...with Standard of Practice 5.1.

Describe the basis for the Finding/Deficiencies Identified:

RMGC has developed a closure and reclamation plan as part of their Plan of Operations NVN-072662 and Reclamation Permit #0061 (*Section 4 - Reclamation Plan*) and a *Tentative Plan for Permanent Closure for the Round Mountain Mine, Nevada (TPPC)* in accordance with the requirements at Nevada Administrative Code (NAC) 445A.398.7. The most recent version of the *Reclamation Plan* contained in the Phase S Expansion Plan of Operations and Reclamation Permit Amendment is dated December 29, 2021. The most recent version of the TPPC is dated March 2022. The plans describe activities to reclaim and close process facilities at the conclusion of mining.

The plans have been prepared in accordance with applicable state and federal requirements and include measures for the decommissioning of the cyanide facilities, including the heap leach pads, process plants, TSF, solution ponds, collection ditches, and equipment that has contained process solutions. The closure activities related to heap leach pads and associated ponds includes fluid management, regarding the pad slopes, and cutting and folding liners, backfilling, and revegetating process ponds. The closure activities related to the process buildings includes triple-rinsing process equipment with fresh water, demolition, and cover placement. Closure activities related to the TSF include embankment regrading, surface regrading, growth media placement, ripping, and revegetation.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

In addition, the WPCPs outline various closure requirements, including the preparation of a final closure plan, which must be submitted to NDEP before initiating permanent closure.

The Phase S Expansion Plan of Operations and Reclamation Permit Amendment (dated December 29, 2021) presents a general implementation schedule for operational, closure, and reclamation activities. The schedule outlines the activities for the heap leach facilities, the milling and process facilities, and the TSF. The schedule accounts for reclamation and process fluid stabilization of the heap leach facilities; demolition and reclamation of the milling and processing facilities; and consolidation, reclamation, and process fluid stabilization of the TSF.

RMGC is required by the State of Nevada, Bureau of Land Management (BLM), and their permit requirements to review and update the *Reclamation Plan* at least every three years. The TPPC must be updated every five years as part of the renewal of RMGC's WPCPs. RMGC is also required to update the reclamation and closure bonds with every operational modification. The most recent update is the Phase S Expansion Plan of Operations and Reclamation Permit Amendment dated December 29, 2021. This amendment serves as the basis for the cost estimate approved by NDEP-BMRR on June 17, 2022 and BLM on June 24, 2022.

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

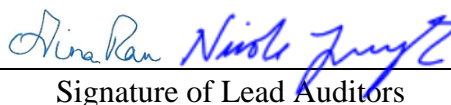
- The operation is: in full compliance
 in substantial compliance
 not in compliance...with Standard of Practice 5.2.

Describe the basis for this Finding/Deficiencies Identified:

RGMC developed a cost estimate for the funding of third-party implementation of the closure activities. RMGC uses the Nevada Standard Reclamation Cost Estimator (SRCE) to estimate the reclamation and closure costs. The SRCE estimates are based upon a third-party government contractor performing the reclamation work and includes indirect costs for Engineering and Design, Contingency, Insurance, Performance Bond, Contractor Profit, Contract Administration, and BLM Indirect Costs.

RMGC is required by NDEP-BMRR and BLM to review and update the cost estimate at least once every three years, or as required by changes in planned disturbances or operational modifications. RMGC most recently updated their closure and reclamation cost estimate for the Phase S Expansion Plan of Operations and Reclamation Permit Amendment, dated December 29, 2021. This amendment served as the basis for the cost estimate approved by NDEP-BMRR on June 17, 2022, and BLM on June 24, 2022.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

RMGC has established an approved financial mechanism to cover the estimated costs for cyanide-related decommissioning activities. The financial mechanism includes two surety bonds and one Letter of Credit covering the estimated closure and reclamation costs for the entire mine site, including cyanide-related decommissioning activities.

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

Standards of Practice

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

- The operation is: in full compliance
 in substantial compliance
 not in compliance...with Standard of Practice 6.1.

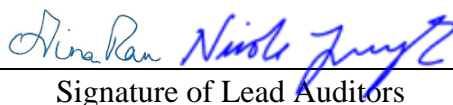
Describe the basis for the Finding/Deficiencies Identified:

RMGC has developed and implemented SOPs and other procedures that describe the management and operation of the cyanide facilities. These procedures cover the safe operation of the cyanide management facilities, decontamination of cyanide equipment prior to maintenance work, and entry into confined spaces. These documents describe PPE requirements, operator responsibilities, and procedures for using and handling cyanide. Procedures reviewed included RMGC's *Confined Space Program High Risk Activities* and RMGC's *SOP for Cyanide Safety*, which state that cyanide tanks, lines, pump, or associated items should be decontaminated prior to performing maintenance work on them.

Verification of the written procedures included review of the SOPs and worker interviews. The procedures and plans have been updated as needed.

The PPE required throughout the mine site includes a hard hat, safety glasses with site shields, safety shoes, and high visibility clothing. When cyanide-related tasks require additional PPE, the SOPs specify the additional PPE that is required, such as the *Offloading Chemicals to Bulk Storage* SOP requires operations personnel to don goggles, face shield, chemical resistant gloves, and a chemical resistant suit if they are to enter the exclusion zone while the TransWood driver is offloading cyanide from the delivery truck. The *Working in or Around Solution Ponds, Sumps, and Ditches* SOP requires the use of a life jacket when working in or around any solution pond with a level that is higher than the knees of the individuals working, a waist belt if working alongside slopes for long lengths of time, and leather or chemical resistant gloves.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

The *Bulk Chemical Delivery Report* requires a Work Area Inspection and a Delivery Vehicle inspection prior to unloading cyanide including an inspection of the tank containment, cyanide kit, PPE cabinet, emergency shower and eyewash, availability of wash water, driver's PPE, and emergency shutdown devices and hose condition on the delivery truck. The ADR Plant and Mill procedures require that prework inspections are conducted daily by the Shift Supervisor. The *Leach Pad Operator SPM* requires daily Supervisor and Pad Crew Lead inspections to assess any issues including as liquid ponding, bird netting, and wildlife mortality.

The operation 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. Each department conducts pre-shift meetings, which provides employees an opportunity to share concerns and comments on safety issues.

Based on discussions with operators during the site inspection, they reported that they can provide input during pre-shift meetings and indicated that if they have a safety issue, they are comfortable discussing the issue with their supervisor and are able to provide input.

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:

The targeted setpoint for the Mill leach/CIL circuit pH is 10.5. Adjustments to the pH levels are made based on pH readings that are gathered every two hours for Leach Tank #1, every four hours for Leach Tanks #2 and #3, and CIL Tank #6 every 8 hours. Review of a random sampling of *Leach/CIL Operator Reports* indicated that the pH is maintained within the guidelines.

Operators are required to check the pH in process solutions every two hours and maintain the pH above 9.6. If pH drops below 9.6, operators are required to notify their supervisor, secure or ventilate the plant depending on which plant, verify that ceiling fans are operating, monitor atmospheric conditions on an hourly basis, and minimize time spent in the plant.

For the VCIC circuits, the pH is monitored daily with a target between 10.3 and 10.4. The pH on the heap leach pads is increased by adding lime from the pH adjustment lime skids to the process solutions.

Round Mountain
Name of Operation

Avin Pan Nishu Jung
Signature of Lead Auditors

April 6, 2023
Date

RMGC does not have any cyanide mixing operations since cyanide is delivered in liquid form.

RMGC has identified the following areas where workers may be exposed to hydrogen cyanide (HCN) gas: Mill, ADR Plant, Gold Hill ADR Plant, SDED Plant, NDED VCIC building, and WDED VCIC buildings. Fixed, ambient HCN monitors are located within these areas and this was confirmed through observation during the site inspection. These monitors have an initial alarm set at 4.5 or 4.7 ppm, depending on the device's measurement increment, 0.5 or 0.1 ppm respectively, and a high-level alarm set at 10 ppm. Workers completing tasks that have the potential for worker exposure to HCN, such as opening equipment that contained cyanide, use portable HCN monitors.

The *Offloading Chemicals to Bulk Storage SOP* and the *Cyanide Safety SOP* require the use of additional PPE when working around cyanide, including goggles, face shield, chemical resistant gloves, and a chemical resistant suit. In addition, the auditor observed the placement of appropriate signage when entering areas where cyanide may be present that specify the required the PPE.

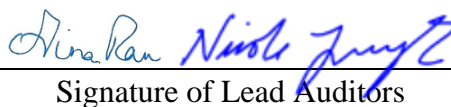
RMGC has installed fixed, ambient HCN monitors for confirmation that controls are adequate to limit worker exposure to HCN gas. Fixed HCN monitors were observed during the site inspection of the 2022 Recertification Audit in multiple locations at the Mill, ADR Plant, and SDED Plant, one at the top of the VCIC in the NDED building and WDED Feed Pont #11 building, and four at the Gold Hill ADR Plant. The monitors have an initial alarm set at 4.5 or 4.7 ppm depending on the device's measurement increment, 0.5 or 0.1 ppm respectively, and a high-level alarm set at 10 ppm. Signs are posted at each fixed monitor instructing personnel to evacuate the area when the light is flashing, which occurs at 4.5ppm or 4.7 ppm to 9.9 ppm and that a flashing light plus a siren means that HCN levels exceed 10 ppm and personnel are to evacuate the plant.

Altair 5X meters are available for use in the Gold Hill ADR Plant and by maintenance personnel. These meters are set to alarm at 4.5 ppm and 10 ppm and are automatically calibrated when set in their docking stations. The *Multi- and Single Gas Meters SOP* provides startup and operation procedures, bump test and calibration steps, shutdown, battery charging, and a trouble shooting guide.

Exposure to cyanide dust is not expected since RMGC uses only liquid sodium cyanide in their processes.

Hydrogen cyanide monitoring equipment is maintained, tested, and calibrated as directed by the manufacturer. The calibration of the fixed HCN monitors is set at a frequency of 28 days and the JD Edwards software issues PM work orders for the calibrations. The calibration work orders include safety instructions, tools and supplies needed, steps required to complete the calibration, and documentation of the calibration readings. A sampling of completed

Round Mountain
Name of Operation



Signature of Lead Auditors

April 6, 2023
Date

work orders and a three-year completed PM history were reviewed for the recertification period and found to be complete.

The portable Altair 5X HCN meters automatically receive a bump test and/or calibration when placed in a docking station. Operators are instructed to return the meters to their docking stations when not in use. Maintenance personnel demonstrated how the bump test and calibration functions work to the auditor during the site inspection. If the docking station screen shows PASS, then the Altair meter is ready for use. The calibration and bump test information are periodically downloaded and reviewed by the Safety Department.

The signage at the mine was physically evaluated during the site inspection and was found to be appropriate for the operation. Warning signs included locations where cyanide is present, areas where smoking, open flames, eating, or drinking are not allowed, and PPE requirements. Everywhere an employee can access a cyanide line has been labeled and has proper signage.

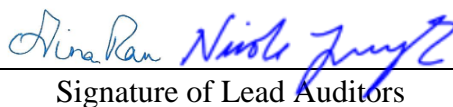
Warning signs were posted on or next to the man-doors or gates at entrances to the Mill, ADR Plants, WDED Pond #11 area, and SDED and NDED Plants. The warning signs state that cyanide is present in the area and no eating, drinking, or use of tobacco is allowed. Smoking is only allowed in designated areas throughout the entire mine site; therefore, signs that state no smoking or open flames are allowed are only posted in key areas. The TSF and associated pipelines are after the cyanide destruct process and either do not contain cyanide or minimal levels of cyanide. Therefore, signage is not posted at the TSF or along associated pipelines.

RMGC has also posted cyanide warning signs on the fencing around heap leach facilities. In addition to these warning signs, cyanide safety training is delivered to all mine employees and the risks associated with cyanide are reviewed. Area-specific training is also given to personnel working in specific areas of the plant. Cyanide locations and associated risks are covered in detail during these trainings. Training records were sampled for the recertification period and were found to be complete. Employee awareness of cyanide locations, prohibited activities, and PPE use was verified through discussions with operations personnel during the site inspection and was found to be very good.

All cyanide delivered by Cyanco is dyed a red color for clear identification that the product is high-strength liquid cyanide. The Safety Data Sheet for the sodium cyanide delivered to site was reviewed and indicates the solution is dyed.

The cyanide addition points in the different processes were observed; however, the ends of the cyanide addition lines are below the level of the liquid in the process tanks and the auditor was not able to observe the cyanide color. The auditor verified compliance with this requirement through interviews with the Process Supervisor and crew leads.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

RMGC has installed showers, eye wash stations, and fire extinguishers at strategic locations throughout the operation in areas where a potential for exposure to cyanide exists. These items were observed throughout the cyanide areas within and outside the Mill, ADR Plants, WDED Pond #11 area, and SDED and NDED Plants, including the cyanide unloading and storage tanks areas and processing areas. A sample of safety showers and eyewash stations were checked during the site inspection and found to be operational. In addition, portable eyewash stations are available to place near specific tasks if operations or maintenance personnel prefer to have a station right next to the work area.

Operators are required to complete the *Bulk Chemical Delivery Report* prior to unloading each cyanide shipment. This form requires operators to test the eyewash and safety shower in the unloading area prior to a cyanide delivery to ensure they are functional. In addition, operators complete an inspection of every eyewash/safety shower in the process plants.

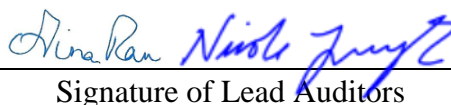
All fire extinguishers in and around the process areas and cyanide unloading/storage tank areas were visible, inspected as verified by observation of inspection tags on each extinguisher, and observed to be ABC dry chemical extinguishers. Fire extinguishers are visually inspected monthly and hydrostatically tested every three years.

RMGC has identified all tanks and pipes that contain cyanide to alert workers of their contents. All storage tanks containing cyanide were labeled as "Cyanide". All piping containing liquid cyanide and process solutions were observed for signage, labelling, and directional labels on pipes. Although most areas were appropriately marked, several areas were noted during the site inspection where piping did not have adequate signage or where flow direction was not shown. After the site inspection, RMGC added labeling and provided photographic evidence of additional or clean labels. The audit team found this to be acceptable and deemed that no further action was required.

Safety Data Sheets (SDSs) and SOPs are maintained on a computerized system accessible to RMGC employees through any computer terminal on the site-wide computer network. Based on demonstrations and interviews with operators and crew leads during the site inspection, they were able to access the SDSs from computer terminals in the process plants and employees who do not have access to the computer terminals said that they would request a copy of a SDS from their Supervisor when needed. SDSs and SOPs are available in English, which is the language of the workforce.

RMGC has developed and implemented an *Incident Reporting and Investigation Procedures SOP*. The SOP provides a systematic means for internally reporting and investigating incidents, as well as complying with the injury and illness reporting and recordkeeping requirements of the Mines Safety and Health Administration (MSHA) and state and local regulatory agencies. Incidents are defined as injuries, illnesses, property damage, vehicle damage, chemical releases, spills, hazards, and near misses.

Round Mountain
Name of Operation



Signature of Lead Auditors

April 6, 2023
Date

This SOP requires all employees to report all incidents to their direct Supervisor/Lead immediately. All significant incidents, which includes workplace injuries, including cyanide exposure, are required to be investigated. The on-call Safety Specialist assists the department Supervisor/Lead in conducting the investigation. A Major Incident and Investigation Team (MIIT) must investigate all incidents that have the potential to cause harm to one employee or group of employees, damage to RMGC property in excess of \$50,000, cause or almost cause an environmental spill that would become a Nevada State reportable incident or is determined to be a Critical Risk related incident.

On February 6, 2022, a contract delivery driver was exposed to crystallized cyanide during a cyanide offload. The driver was disconnecting their equipment when cyanide crystals blew off the vent on the top of the cyanide storage tank. The driver called for help and the plant operators initiated a 'code blue'. The cyanide antidote kit was accessed, and oxygen was administered until the driver was transported to the onsite clinic. The scene was secured for investigation and the driver was transported to a hospital for observation.

A MIIT was assembled to complete the incident investigation for this incident. The MIIT members included a safety professional, the Process General Foreman, the area supervisor, and a peer of the driver. The incident investigation report documented the conditions at the scene, investigation information, and immediate causes. Key learnings and follow up actions were documented on the incident report in Kinross' Incident Management module in InteleX where all incidents are recorded. Based on review of MSHA's website, this incident was reported to MSHA as required and is publicly available. The incident was also reported to ICMI.

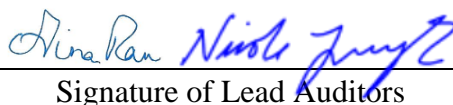
6.3 Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

- 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:

Cyanide antidote kits (amyl nitrite), medical oxygen, and a non-rebreather mask are stored in refrigerators inside the control rooms, electrical rooms, or storage units at the Mill, SDED and NDED Plants, WDED Pond #11 area, and ADR Plants. The refrigerators are visually checked each shift to confirm seals are intact. The Emergency Response Coordinator completes a more detailed monthly inspection on all cyanide antidote kits and documents the inspection on the *Cyanide Antidote Kit* form. A review of a representative sampling of completed inspection forms indicate that the monthly inspections are being completed. Members of the Mine Rescue Team and process plant operators are trained and authorized to administer the amyl nitrite antidote.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

Radios and cellular mobile phones are the primary forms of communication throughout RMGC. Telephones are available for use in the control rooms and most electrical rooms. Operators also carry a radio that allows them to communicate on a normal basis and to broadcast an emergency notification by stating "Code Blue" over the radio.

Two Cyanokit antidotes (hydroxocobalamin) are retained within temperature-controlled rooms at the RMGC Clinic for intravenous application. Clinic personnel conduct monthly inspections to ensure that the antidote kits remain within the expiry date. Two additional Cyanokits are retained within the site's ambulance. The kits are inspected monthly by the Emergency Response Coordinator to check expiry dates. Current expiry dates on the kits observed during the site inspection are May 24, 2024.

Cyanide antidote kits are inspected routinely by operations personnel and monthly by the Emergency Response Coordinator. Based on observations during the site inspection, the auditor observed that the cyanide antidote kits were stored at the correct temperatures and were not expired.

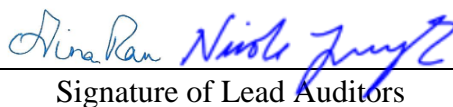
The Emergency Response Coordinator conducts a monthly inspection of RMGC's ambulance. This inspection is documented on the *State of Nevada EMS Program Inspection Form – Ambulance Unit* and includes an inspection of basic life support equipment, medications, and miscellaneous items that are present on the ambulance and the operational status of the ambulance, such as lights, sirens, brakes, horn, etc. The Emergency Response Coordinator also conducts a monthly *RMGC Command and Gear Inspection* to ensure emergency response equipment is available and in good condition. Based on review of a representative sampling of completed inspection forms, these monthly inspections are completed, and equipment is available in the event of an emergency.

RMGC maintains an *Emergency Response Manual (ERM)* which includes actions to be taken for exposures to hazardous materials, including decontamination of victims and responder safety. The *Cyanide Safety SOP* outlines the immediate actions, first aid, and medical treatment steps when a worker is exposed to HCN or displays symptoms of cyanide poisoning. The *Cyanide Safety SOP* also provides directions for administering amyl nitrite.

RMGC continues to maintain an onsite clinic and an Emergency Response Team (ERT). The clinic is staffed with ten medical professionals and two administrative personnel. The medical professionals are on a rotating schedule so that the clinic is open from 6am until 5pm for seven days per week, except for holidays. When the clinic is closed, an on-call care provider is available and can come to the clinic in the event of an emergency.

The ERT consists of Emergency Medical Response, Emergency Medical Technicians, and Advanced Emergency Medical Technicians (AEMTs) who are all trained to provide first aid and initial medical assistance. The AEMTs are also qualified to administer the Cyanokits (hydroxocobalamin) intravenously.

Round Mountain
Name of Operation



Signature of Lead Auditors

April 6, 2023
Date

This capability was verified through interviews with the clinic’s Medical Director and the Emergency Response Coordinator.

RMGC has onsite capability to treat cyanide exposures; however, if care is required at offsite medical facilities, RMGC maintains a relationship with Banner Churchill Hospital in Fallon, NV and Renown Hospital in Reno, NV. RMGC can self-transport patients in RMGC’s ambulance or transfer patients to the Nye County Ambulance Service. RMGC maintains a *Reciprocal Aid Agreement* with Nye County whereby both entities agree to maintain ambulance services and will assist each other in the event of an emergency as needed. RMGC also maintains a list of air ambulance services in the event a patient needs to be transferred quickly to a regional hospital.

RMGC maintains regular dialogue with Banner Churchill Hospital in Fallon, NV and Renown Hospital in Reno, NV regarding the potential treatment of cyanide exposure patients. While a Memorandum of Understanding has not been entered into with either hospital, both facilities have been made aware through discussions that cyanide exposure treatments may be required. Based on interviews with RMGC’s clinic Medical Director and the Emergency Response Coordinator, they are confident that the hospitals have adequate, qualified staff, equipment, and expertise to respond to cyanide exposures.

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

Standards of Practice

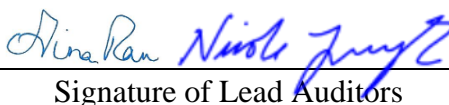
7.1 Prepare detailed emergency response plans for potential cyanide releases.

- 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:

RMGC maintains an *Emergency Response Manual* (ERM). The ERM was last revised in March 2021 and includes the following sections: Emergency Management Guidelines, Communications, Emergency Utilities Shut Down, Emergency Response Guidelines, and Hazardous Material Response Guidelines. Part 5 - Hazardous Material Response Guidelines includes Section 5.7 – *Cyanide Spill Response Plan (CSRP)*. This plan addresses potential accidental releases of cyanide, including Safety Equipment/Inspections; Response Equipment Inventory and Inspection Guidelines; Inspections, Risk Minimization Measures, Emergency Preparedness, and Operator Training; and the Cyanide Spill Response Plan, which includes specific steps for responding to a cyanide spill.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

RMGC's *Emergency Action Plan (EAP)* includes two sections for responding to cyanide exposure incidents: *Cyanide Exposure First Aid* and *Cyanide Exposure Decontamination*.

RMGC's EAP includes guidelines for sodium cyanide spills. The guidelines begin and general containment, countermeasures, and cleanup guidelines and then contains additional guidelines for each of the following:

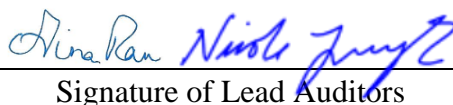
- a) Catastrophic release of cyanide [liquid or HCN gas] from process plants
- b) Cyanide transportation event
- c) Releases during fires and explosions
- d) Overflow of ponds and impoundment areas
- e) Power outages and pump failure
- f) Uncontrolled seepage
- g) Failure of leach facilities [including the TSF]

Cyanide releases during unloading, pipe, valve, and tank ruptures are addressed in the CSRP. Travel routes for transporting liquid cyanide to the offloading areas within GHP and SVCO have been established. Cyanco and TransWood are responsible for transport and for any transportation accidents until the cyanide delivery at the RMGC unloading areas is complete as specified in the cyanide supply contracts between RMGC and Cyanco. TransWood only delivers liquid sodium cyanide via tanker trucks. The auditor verified this information through an interview with a TransWood driver during the site inspection.

The CSRP describes the following:

- Steps to post someone to prevent other personnel from entering the spill area and securing the area from entry by means of a barricade. Section 2.4 within the ERM outlines external communication protocols.
- The locations of cyanide antidotes and first aid equipment are listed in the CSRP. The use of cyanide antidotes and first aid measures for cyanide exposures are included in the *Cyanide Safety SOP*.
- The CSRP requires that response personnel don the appropriate personal protective equipment (PPE), including as necessary breathing apparatus if warranted by HCN monitoring, rubber boots, chemical resistant suit, gloves, face shield, and then assess the situation. The assessment includes checking that the cyanide distribution pump has been turned off, what is leaking, is the leak/spill controllable or under control.
- Response personnel must also assess if the spill is within or outside of containment and if outside of containment, which direction is the spilled material flowing and at what rate. After fully assessing the situation, response personnel are to implement containment measures appropriate for the release scenario. Once the spill has been contained, response personnel are to begin spill cleanup measures including contaminated soil removal and placement on an active leach pad or, for areas where contaminated soil cannot be removed, use of calcium hypochlorite for destruction of

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

residual cyanide. Actions taken during a cyanide release are to be observed and recorded by a designated person, including the time of events, and to be included in an incident response report or log. The Safety Department is assigned the role of coordinating any subsequent investigation and reviewing and updating procedures and the ERM if necessary.

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:

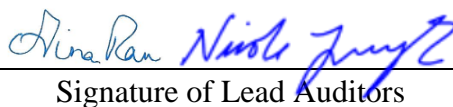
The RMGC Emergency Response Team consists of employees drawn from the workforce. The ERT conducts regular training exercises and members have a chance to provide input to the response procedures contained in the ERM during debriefs/critiques after training, a drill, or an actual event. Based on discussion with the Emergency Response Coordinator, RMGC invites external stakeholders, including the Nye County HAZMAT team, medical responders, Cyanco, and TransWood, to join RMGC for desktop drills.

RMGC continues to maintain a robust community outreach program, managed by the Corporate Social Responsibility Specialist (CSR) who was interviewed during the audit. The mine has regular communications with regulators, local agencies responsible for emergency planning and response, and the community in general. Records were available for review to demonstrate that stakeholder engagement and involvement in emergency response planning continued throughout the recertification period.

RMGC entered into an agreement with the Nye County Emergency Services in 2008 as part of implementation of an initiative known as Awareness and Preparedness for Emergencies at Local Level (APELL) for mining. The agreement provided for the integration of Nye County and RMGC emergency plans and remains in place. The agreement states that updates to all plans are to be communicated to all members and updates are shared during quarterly Local Emergency Planning Commission (LEPC) meetings. After each emergency or drill where members of the APELL coordinating team are involved, the agreement states that the team shall complete a debrief and critique the emergency response. The agreement also says that each entity will support the other in the event of an emergency if requested to do so.

One method used to communicate regularly with the community is a monthly newsletter, called "The Valley View". The October 2022 edition of this newsletter was used to share

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

information about the nature of the risks associated with cyanide use. The article entitled, “Safely Managing Cyanide” details the potential risks to people and the environment and also explains the extensive controls that are in place to manage cyanide safely. The CSR contact information is included in the article and community members are invited to contact her if they have any questions or concerns.

Community engagement is primarily through community meetings and with business sector forums and annual Town Hall meetings which are open to the community. Town Hall meeting records were available for the recertification period. The mine also invites multiple groups in for tours and informational sessions. Records from these stakeholder engagement events were available and demonstrated a clear commitment to engaging with the community.

Much of the RMGC workforce is drawn from and representative of nearby and regional communities and, through induction and training, are aware of mining and cyanide related risks and responses that would apply in the event of cyanide emergency.

Based on discussions with the RMGC Emergency Response Coordinator, local response agencies have been involved in the cyanide emergency planning and response process at RMGC. RMGC maintains a Reciprocal Aid Agreement with Nye County, which includes ambulance services, and an APELL agreement with Nye County Emergency Services for the sharing of emergency services. Many of the ERT members are members of the Hadley or Round Mountain Fire Departments and are familiar with the mine’s emergency response planning process. RMGC also has periodic discussions with the hospitals located in Fallon and Reno, NV regarding the potential need for treatment of cyanide exposure patients.

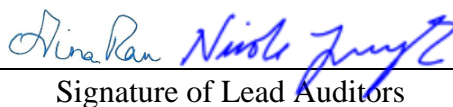
RMGC asks external stakeholders, such as the Nye County Fire Department and HAZMAT team, Hadley Fire Stations, etc., to join RMGC in desktop and live mock emergency drills scenarios to test the procedures in RMGC’s ERM. Due to the COVID-19 pandemic, the Emergency Response Coordinator indicated that the external stakeholders declined to participate in drills during the recertification period.

RMGC ERT also conducts annual joint Hazardous Waste Operations and Emergency Response (HAZWOPER) training with the Hadley Fire Station with the elements of training aligned with the ERM. Outcomes from such training including inputs from Hadley response teams are incorporated into RMGC procedures as appropriate.

RMGC continues to maintain consultative community meetings which provide opportunities for stakeholder inputs, which if applicable, can be included in updated site procedures.

This requirement was verified through discussion with the Emergency Response Coordinator and the CSR.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

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

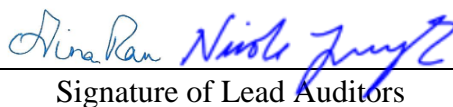
- The operation is: in full compliance
 in substantial compliance
 not in compliance...with Standard of Practice 7.3.

Describe the basis for the Finding/Deficiencies Identified:

The RMGC's Emergency Response Manual (ERM) and associated documents appropriately address the following topics:

- Primary and alternate Site Crisis Management Team (SCMT) leaders, coordinators, and other positions are in the ERM. Section 1.3 in the ERM establishes the roles and responsibilities for site personnel during an emergency response, including who may commit resources necessary for responding to an emergency.
- The current list of ERT members is identified on the RMGC ERT Training Schedule 2022. The ERT consists of 32 members.
- Section 1.5 in the ERM outlines the *Training Guidelines* for the ERT, including EMT and Mine Rescue training topics, scheduling guidelines. Topics include trauma, cardiopulmonary resuscitation (CPR), medical, CPR, and skills training.
- Sections 1.1 and 1.2 the ERM include the call-out procedures in the event of an emergency. The 24-hour contact information for the SCMT leaders, coordinators, and other emergency response positions are listed in Section 2.4. In the event of an emergency, including an employee exposure to cyanide or a cyanide spill, security will announce a "Code Blue" over the site radio system. This call-out initiates the response from the ERT and site management.
- Section 1.3.2 in the ERM specifies the responsibilities during an operational emergency, including the responsibilities of the person initiating the emergency response, supervisors, security, the RMGC General Manager, and the ERT Coordinator.
- Emergency response equipment that is needed for response to the different types of events are listed in the ERM. The various forms of PPE required for hazmat responses and decontamination equipment are described in Section 5 of the ERM.
- The Emergency Response Coordinator inspects the ambulance and its contents and inspects the cyanide antidote kits in throughout the mine, including the RMGC clinic and ambulance, to ensure the availability of emergency response equipment, including the cyanide antidote kits.
- The roles of outside responders are outlined in the *Reciprocal Aid Agreement* and the APELL and the hospitals in Fallon and Reno, NV have been notified of the potential that cyanide exposure patients may be transported to their facilities.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

RMGC continues to maintain the Reciprocal Aid Agreement and APELL with Nye County for emergency response services. Based on discussions with the Emergency Response Coordinator, RMGC has invited members from Nye County services to participate in mock drills and desktop exercises; however, due to the COVID-19 pandemic, they have not participated in recent drills or desktop scenarios. In addition, periodic communication has been maintained with Banner Churchill Hospital in Fallon, NV and Renown Hospital in Reno, NV regarding the potential receipt of cyanide exposure patients.

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:

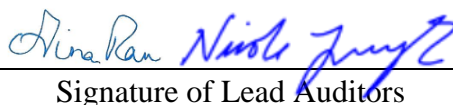
The ERM contains emergency phone numbers and instructions for notifying security, management, mine environmental and safety departments, and the ERT in the event of an emergency. The ERM also contains procedures and phone numbers for key external stakeholders, including community officials for Nye County, state and federal regulatory agencies, emergency services, including hospitals and air transport services, and outside contractors, including Cyanco, and Transwood. Section 4.0 – *Spill Response Procedures* in the EMPM specifies who and which entities are to be notified in the event of a spill (cyanide or other releases) and provides the contact information.

Section 2.4 – *External Communication Protocols* in the ERM provides a basic overview of the Emergency Communication Policy for communicating with external parties, including the community and news media, during an emergency. The RMGC/Kinross Crisis Management Plan is to be referenced during an emergency and communications are to be managed as a team under the direction of RMGC’s General Manager.

Section 4.0 – *Spill Response Procedures* in the EMPM includes a procedure for notifying ICMI of any cyanide releases that meet ICMI’s definition of a significant cyanide incident. In addition, the EAP lists the events that qualify as significant cyanide incidents that require notification to ICMI and includes the reporting requirements.

RMGC had two events during the recertification period that meet the criteria of a significant cyanide incident: 1) cyanide exposure incident in February 2022, and 2) a release of process solution in November 2019. RMGC notified ICMI of the cyanide exposure via email. The process solution release occurred prior to the implementation of the ICMI notification requirement effective date of June 2021. Both incidents were

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

thoroughly investigated according to mine procedures. Improvements were made to prevent similar incidents in the future and the outcomes of both incidents did not result in no serious or long-term impacts.

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

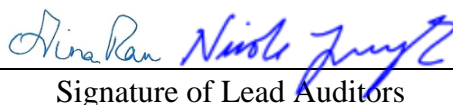
The operation is: in full compliance
 in substantial compliance
 not in compliance...with Standard of Practice 7.5.

Describe the basis for the Finding/Deficiencies Identified:

The mine ERM describes remediation measures that are to be taken for cyanide releases:

- Recovery or neutralization of solutions or solids: The CSRP in the ERM includes procedures on the recovery of materials (spilled liquid, soil, gravel, etc.) that have been contaminated with cyanide solution. Liquids from a cyanide spill that occurs within a secondary containment area are to be pumped to a truck, or other large vessel, or a lined process pond. If cyanide solution is spilled onto soil or gravel areas, the soil or gravel is to be removed and placed on an active heap leach pad. If the soil cannot be removed and placed on an active heap leach pad, the area is to be neutralized with calcium hypochlorite under the direction of the Environmental Department.
- Decontamination of soils / media: The CSRP states that cyanide-contaminated soils are to be excavated and placed on an active heap leach pad. Section 4.4.4 – *Clean up the spill* in the EMPM specifies that the Environmental Department oversees the sampling of affected areas in coordination with NDEP and will direct the removal of additional quantities of soil until samples contain less than 0.02 mg/L WAD cyanide. Section 4.4.6 in the EMPM, under *Cyanide contaminated soil*, states that under special circumstances and with prior approval from the Environmental Department, calcium hypochlorite or hydrogen peroxide (not stored on site) may be used on small areas of cyanide contaminated soil where the soil cannot be excavated. Based on interviews with RMGC environmental personnel, calcium hypochlorite is not stored on site.
- Management/disposal of clean-up soil/debris: Section 4.4.4 – *Clean up the spill* in the EMPM includes instructions for managing and disposing of cleanup materials (soil, gravel, etc.).
- Due to the distance of nearby communities and the distance to the drinking water supply wells for RMGC, which is greater than one mile from the processing facilities, the risk of contaminating drinking water supplies due to a cyanide release

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

is low. However, RMGC's Environmental Engineer indicated that RMGC would provide alternate sources of drinking water if ever needed.

No surface waters are located near or on the RMGC site. The CSRPs include the use of calcium hypochlorite to destroy cyanide within cyanide-contaminated soils that cannot be removed after a cyanide release.

Section 4.4.4 – *Clean up the spill* in the EMPM specifies that the Environmental Department will oversee the sampling of cyanide contaminated areas in coordination with NDEP. Sample locations, methodologies, and additional parameters will be determined in coordination with the NDEP since those items will be specific to each spill. For the excavation of cyanide-contaminated soil, soil must continue to be removed until soil sample results indicate WAD cyanide concentrations are less than 0.02 mg/L.

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:

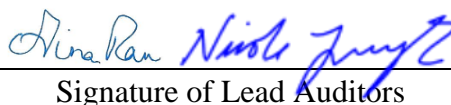
Based on discussions with the Emergency Response Coordinator, the ERM is reviewed at least annually by the Emergency Response Coordinator or as needed following an actual emergency or an emergency response drill. The latest revision is dated March 2021.

RMGC completed three drills since the previous Cyanide Code recertification audit. On September 22, 2020, RMGC performed a tabletop exercise for practicing a crisis management scenario. The scenario included an emergency where two employees were containing a cyanide spill and one of them was overcome by fumes and collapsed. The scenario also simulated the receipt of several communications from external stakeholders and the response team had to determine what to do to respond to these external communications while safely removing the exposure victim from the incident scene.

On August 18, 2021, the SCMT and ERT completed a tabletop exercise that included a propane truck striking a cyanide delivery truck during a cyanide unloading event, a cyanide spill resulted from the collision, the propane truck driver collapsed on the ground, and the cyanide delivery truck driver was unaccounted for.

On August 25, 2021, the ERT completed a live cyanide response drill. The scenario involved a maintenance worker and an observer being sprayed with 30% strength cyanide solution while performing maintenance on a cyanide distribution tree. The ERT was dispatched and

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

responded to the emergency. This drill was used to test the full emergency response capability of responding to a human exposure and an environmental release. Many of the county volunteers for the ambulance, fire-rescue, or HAZMAT team, are also on the RMGC Emergency Response Team. Three members of the RMGC ERT that participated in the August 2021 drill are also on external response teams.

Section 1.3.3 – *Responsibilities after the Emergency* in the ERM indicates the Safety Department is responsible for writing the final report for the General Manager’s approval and reviewing procedures and updating the ERM if necessary. In addition, this section requires that the ERT Coordinator interviews each team member, prepare a report for the Safety Department, recommend additional training if needed, and conduct a critique ‘de-briefing’ with all ERT members involved. Based on review of documentation and correspondence regarding the three drills described in Section 7.6(2), critiques were performed, and corrective actions identified as needed. Two of the five corrective actions identified during the investigation of the February 6, 2022 crystalline cyanide exposure included reviewing and updating maintenance and operational strategies and expanding the scope of the chemical handling Critical Risk Management (CRM) to include crystalline cyanide.

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

Standards of Practice

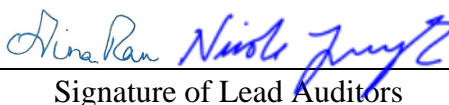
8.1 Train workers to understand the hazards associated with cyanide use.

- 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:

RMGC site personnel receive *Occupational Health, Hazard Communication, and Radiation* training as part of the new hire training program. This training includes cyanide awareness and recognition. Workers who are assigned to specific areas of the operation where cyanide is an integral part of the process (e.g., the Processing Team, field maintenance) receive additional training, including *Chemical Hazardous Awareness / Cyanide Awareness* and *Cyanide Antidote* training presentations. These presentations include information on the safe use and handling of cyanide, symptoms of cyanide exposure and first aid, and the antidotes available on site and how they are administered. After the training presentations, workers are required to complete a *Cyanide Safety and Awareness Review* test to demonstrate their knowledge and understanding.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

In addition to the training presentations, Processing Team employees are trained on cyanide-related SOPs, receive hands-on training in the field, and must complete cyanide-related tasks while being observed by a trained observer before completing cyanide-related tasks on their own. This training is documented on *Training Observation Forms* using iAuditor software on computer tablets. This easily allows observations to be completed in the field with remarks and corrective actions entered during the observation.

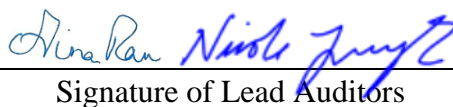
The auditor verified compliance of cyanide training for employees through interviews of the operators during the site inspection and reviewing training materials and a representative sampling of training records from the recertification period.

Based on discussions with the Processing Department Trainer and review of training materials, the *Cyanide & Chemical Awareness Refresher* training is presented to all employees on an annual basis. Processing Team employees who perform cyanide-related tasks or work in areas where cyanide may be used receive additional refresher training that includes the *Chemical Hazardous Awareness / Cyanide Awareness* and *Cyanide Antidote* training presentations and are required to complete a *Cyanide Safety and Awareness Review* test to demonstrate their knowledge and understanding.

RMGC retains training records for employees while an employee works for the mine, including *Training Observation Forms* and *Training Class Sign-in Sheets*.

RMGC is switching over to a web-based software system called “Redlist” for tracking training requirements and maintain training records. Currently, cyanide training requirements, including training on cyanide-related standard operating procedures, and training records for the Processing Team employees are included in the system. RMGC provided a random sampling of hard copy training records and an overview of Redlist during the audit. In addition, training is also documented on Mine Safety and Health Administration (MSHA) 5000-23 training forms as required by MSHA.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

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:

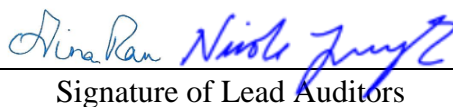
RMGC trains workers to perform cyanide-related tasks safely with respect to themselves, their colleagues, and the environment through cyanide awareness training, SOP training, and *Training Observation Forms*. Processing Team employees are trained on offloading procedures as well as the other SOPs. Verification of operator training was conducted with the Processing Department Trainer while on site as well as reviewing a sampling of training records from the recertification period (hard copy and in Redlist).

The training elements involving cyanide management are identified for Processing Team employees in Redlist, including cyanide awareness, SOP training for specific tasks, and worker observations. As noted previously, Redlist identifies the individual requirements of the overall training program and tracks them for each employee. Following job departmental training, the primary training method is on-the-job training. Employees are instructed on the proper use of the equipment and related safety hazards as identified in the SOPs.

Only qualified personnel at RMGC who have knowledge of the area and specific tasks provide task training to operators working with cyanide. New hire training and the department-specific cyanide training is provided by those qualified and experienced to conduct the training. RMGC's Processing Department Trainer conducts most of the cyanide-related training and has over 16 years of experience. MSHA requires all task training to be conducted and signed off by a competent trainer. Verification of the fulfillment of this requirement was done through interview with the Processing Department Trainer and a review of signed training records.

RMGC employees who will be working with cyanide are required to have training in cyanide safety and first aid before they are scheduled to work in a cyanide area. They also are educated on the cyanide SOPs related to their job position, observed by experienced personnel, and may not complete tasks until the observer or supervisor is satisfied that training and task understanding is complete.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

Refresher training on *Cyanide Hazard Awareness and Cyanide Antidote* presentation is conducted on an annual basis as a part of the annual MSHA refresher training. The training is designed to ensure that employees continue to perform their jobs in a safe and environmentally protective manner.

RMGC evaluates the effectiveness of their cyanide-related training and operational tasks through either written testing or skills observation. Written tests are kept in personnel files or electronically to document employee testing. Task observations are documented on *Training Observations Forms*.

On a periodic basis, informal evaluations of how employees are performing their job tasks, including cyanide-related tasks, are completed randomly to ensure employees are performing tasks correctly. *Training Observation Forms* are used to document these task observations. Refresher training is given to employees, as needed, if the results of the skills observations are unacceptable.

Interviews were used to confirm this practice. A sample of records from completed written tests and *Training Observation Forms* from the recertification period were reviewed and were found to be acceptable.

Training records throughout an employee's employment at RMGC are maintained either in hard copy form or electronically. A review of several Processing Team employees' files in Redlist was completed during the audit and additional training records completed with the iAuditor software were also provided for review. Training records include the trainer's name, topics covered, and date of training. Completed *Training Observation Forms* and *Cyanide Safety and Awareness Review* tests demonstrate 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.

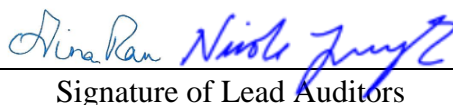
Describe the basis for the Finding/Deficiencies Identified:

Based on review of a sample of training records, cyanide unloading, operations, and maintenance personnel are trained in the procedures to be followed if cyanide is released. These employees receive training on the *Cyanide & Chemical Awareness Refresher* presentation and complete the *Cyanide Safety and Awareness Review* test to demonstrate their understanding of the training received. In addition, they are trained on the *Cyanide Safety SOP*, which includes the symptoms of cyanide poisoning and first aid measures for cyanide exposures. Decontamination of victims is included in the ERM and is typically performed by the ERT.

Based on discussions with the Emergency Response Coordinator and review of the ERM, the Emergency Response Coordinator and members of the ERT are trained in emergency procedures and the use of emergency equipment. Each year an emergency response training schedule, *RMGC ERT Training Schedule 2022*, is developed, and training records are maintained. Emergency Response personnel are trained monthly by internal and external trainers. Training topics include but are not limited to CPR/automated external defibrillator (AED) use, hazardous materials and spill response training, cyanide decontamination, potential cyanide poisoning response, and 40-hour initial or 8-hour refresher HAZWOPER training. Drills are also used to evaluate the effectiveness of training and the need for adjustment to plans.

RMGC continues to maintain a *Reciprocal Aid Agreement* and a *APELL* with Nye County services for integrating emergency response capabilities and ambulance services. Based on discussions with the Clinic Director and the Emergency Response Coordinator, many of the RMGC ERT members are volunteer members of the Nye County ambulance and HAZMAT response teams and are involved in emergency planning/response in the community and at the mine site. In addition, RMGC engages in periodic communications with the hospitals in Fallon, NV and Reno, NV regarding services for the treatment of potential cyanide exposure patients. The RMGC ERT and clinic would provide initial response and treatment in the event of a cyanide emergency and these hospitals would then provide monitoring and additional care if needed.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

All employees, including the ERT are required to attend annual refresher training which includes cyanide awareness, exposures and emergency response procedures. Workers who perform cyanide related tasks or located in areas where cyanide is used are required to attend a more detailed annual cyanide refresher training including the *Cyanide Hazard Awareness and Antidote Training* presentation, which includes response to exposures and releases. The ERT conducts monthly training topics on emergency response topics that would be applicable in a cyanide release emergency and includes HAZMAT, patient assessments and treatments and the use of emergency response equipment. This was verified through discussions with the Emergency Response Coordinator and Processing Department Trainer, review of SOPs and training materials, a sample of training records.

Training records include the names of employee and the trainer, the date of the training, topics covered, and a sign-off demonstrating how the employee demonstrated an understanding of the training materials. Employees generally demonstrate an understanding of the training materials through testing or skill demonstration. Hard copy records and records in Redlist for the recertification period were available for review and were found to be acceptable.

9. DIALOGUE Engage in public consultation and disclosure.

Standards of Practice

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

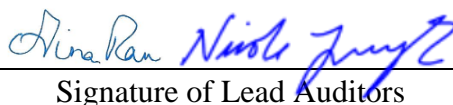
- The operation is: in full compliance
 in substantial compliance
 not in compliance...with Standard of Practice 9.1.

Describe the basis for the Finding/Deficiencies Identified:

The mine works openly with stakeholders and has developed robust stakeholder engagement processes to ensure that effective communications are maintained. Information specifically regarding cyanide management practices, risks, and outreach information was most recently communicated to external stakeholders in the October 2022 edition of the monthly newsletter, *The Valley View*.

Kinross also maintains a “Community Grievance Policy” (TAS-CR-POL-002) that defines detailed requirements for all locations. The mine also maintains a local version

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date

of this procedure to manage complaints or grievances. Each grievance is logged, thoroughly investigated, and resolved. External stakeholders are also invited to comment and provide feedback during tours, annual Town Hall meetings, through the newsletter contact information, and directly through phone or email with the CSR. Records from the recertification period were available for review during the audit and were found to be acceptable.

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:

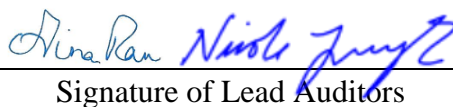
The mine maintains a detailed Stakeholder Communication Plan where the strategy for communication is defined for each stakeholder. Besides inviting all stakeholders to have open dialogue, the mine also invites stakeholders to the site for annual meetings, site tours, and other events. According to interviews and a review of presentation materials, issues such as cyanide management practices, potential EHS concerns, and controls used by the mine for managing these concerns are included during stakeholder interactions.

The local population is highly literate. Although verbal communications during tours and community outreach events are common, the local population is very capable of reading through the written information from the mine.

The mine has formal crisis and emergency management plans and procedures for managing emergencies and notifying stakeholders, including government notifications.

Cyanide release or exposure events to the level of those outlined by the Cyanide Code would likely trigger activation of the Kinross Crisis and Emergency Management System. In this crisis management system, all relevant stakeholders are listed and would be contacted if appropriate. Additionally, the crisis management system requires that press releases be made available to area media.

Round Mountain
Name of Operation


Signature of Lead Auditors

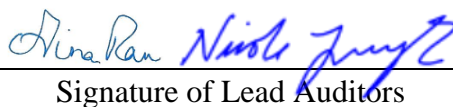
April 6, 2023
Date

ICMI defined “significant cyanide incidents” are reported to ICMI and the public, as per the mine’s Agency Notification procedure. The exposure incident involving a driver was reported to MSHA and is publicly available information. The environmental release incident during the recertification period was reported to the NDEP and is available through a public records request. According to interviews, very significant incidents are also shared through the annual Kinross Sustainability Report and would include information regarding the nature and location of the incident.

Scenarios such as a hospitalization or fatality, a release requiring response or remediation, a significant impact on the environment, a reportable quantity spill, or exceedances of government limits for cyanide in water, air or soil are communicated to stakeholders using “holding statements” or press releases to the media, government authorities, and local communities, as appropriate.

Any release that qualifies as a “state reportable spill” is reported to the state and becomes publicly available information. Multiple interviews during the recertification audit were used to confirm that these practices are implemented, consistently applied, and appropriate for the organization.

Round Mountain
Name of Operation


Signature of Lead Auditors

April 6, 2023
Date