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United States of America

and:

Cripple Creek & Victor Gold Mining Company

Victor, CO

ICMC CERTIFICATION SUMMARY AUDIT REPORT

Cripple Creek and Victor Gold Mine
Colorado, USA

22 February 2024

Project No.: 0707677

The business of sustainability

ERM

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22 February 2024

ICMC Certification Summary Audit Report

Cripple Creek and Victor Gold Mine

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CONTENTS

1. INTRODUCTION

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

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

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

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

Name of Mine: Cripple Creek and Victor Gold Mine

Mine Owner: Newmont Mining Corporation

Mine Operator: Cripple Creek & Victor Gold Mining Company

Name of Responsible Manager: Lori Douglas, General Manager

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Email: taylor.dillon@erm.com

Date of Audit: This recertification audit was conducted November 6-7, 2023.

2. ATTESTION

Auditors Findings:

	☒	**in full compliance with**	
Cripple Creek and Victor Gold Mine is	☐	in substantial compliance with	**International Cyanide Management Code**
	☐	not in compliance with	

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

3. BACKGROUND ON OPERATIONS

Cripple Creek and Victor Gold Mine (CC&V) is located in Teller County, Colorado, southwest of Pikes Peak. It is located between the towns of Cripple Creek and Victor, Colorado. Cripple Creek is located 44 miles southwest of Colorado Springs. Victor is 5 miles southeast of Cripple Creek.

CC&V began surface mining operations in 1976, with mining in its Cresson Project starting in 1995. The mine consists of several open pits and no underground mining. The ore is treated using a heap leach process to recover the gold in two valley leach facilities: Arequa Gulch Valley Leach Facility (VLF1) and the Maize Gulch Valley Leach Facility (VLF2). The rich solution from VLF1 and VLF2 is transferred to two Absorption, Desorption, and Recovery Plants (ADR1 and ADR2) for gold recovery. CC&V commissioned a flotation mill in 2015 to process their high-grade ore; however, CC&V stopped using cyanide in the mill in February 2018 and disconnected the cyanide unloading and storage area and the leach and carbon-in-pulp circuits from the rest of the mill circuits since June 2018. Since the mill did not use cyanide during the recertification period, the mill is not included in the scope of this recertification audit. CC&V's cyanide facilities included in the scope of this recertification audit include:

- Arequa Gulch Valley Leach Facility (Phases 1, 2, 4, and 5)
- Arequa Gulch Absorption, Desorption, and Recovery Plant (ADR1)
- Maize Gulch Valley Leach Facility (Phases 1 and 2)
- Maize Gulch Absorption, Desorption, and Recovery Plant (ADR2)
- Process Solution Enhancement System (PSES) Plant

The Arequa Gulch Valley Leach Fill Facility (VLF1) is an ore beneficiation facility permitted in Amendment 6 with ore placement commencing in 1994. VLF1 is located in the Arequa Gulch on the south side of the CC&V mine site. The final design of VLF1 includes four synthetic-lined leach circuits (Phase 1, 2, 4, & 5), and four synthetic-lined dedicated Process Solution Storage Areas (PSSAs). VLF1 consists of approximately 24 million square feet of area for ore placement. The approved ore loading of VLF1 is approximately 370 metric tons which was completed in 2016. VLF1 is still under leach for gold contained within the ore. Design Documentation for VLF1 is included within the amendments to Permit M-1980-244, Cresson Permit. Amendment 6 contains design documentation for Phases 1 and 2. Amendment 7 contains design documentation for Phase 3, Amendment 8 contains design documentation for Phase 4, and Amendment 9 contains design documentation for Phase 5.

A weak sodium cyanide process solution is applied to VLF1 through a system of pipes and drip emitters. This process solution dissolves the gold in the ore. The gold bearing solution, now called rich solution, flows through the various phases of VLF1 to one of the PSSAs. Rich solution from the PSSAs is pumped

to the PSES Plant which stabilizes VLF1's rich solution prior to gold recovery in ADR1 and then removes remaining solids from the spent solution before it is pumped back to VLF1.

Once within the ADR1 facility, the rich solution passes through a series of carbon adsorption columns, and the gold in solution is adsorbed onto the activated carbon. The series of carbon adsorption columns are arranged in five parallel trains. After passing through the trains, the solution no longer contains high quantities of gold and is called spent solution. Spent solution is pumped from the transfer tank at the end of each train to the Barren tank and then to either the PSES or VLF1. The carbon is then sent to the carbon handling facility to be stripped of the gold, regenerated, and then returned to the process.

The Maize Gulch Valley Leach Facility (VLF2) is an ore beneficiation facility permitted in Amendment 10 to Permit M-1980-244, Cresson Project Mine Life Extension 2 with ore placement commencing in 2016. VLF2 is located north of VLF1 and encompasses Maize, Anaconda, and Swede Gulches. The design of VLF2 includes a lined leach circuit and a lined dedicated PSSA. This facility consists of approximately 15 million square feet of geomembrane lined area for ore placement. The approved ore loading of the VLF2 is planned to reach 207.2 metric tons in 2025. Design documentation for VLF2 is included within Cresson Permit Amendment 10, Appendix 9.

As with VLF1, a weak sodium cyanide process solution is applied to VLF2 through a system of pipes and drip emitters. This process solution dissolves the gold in the ore. The gold bearing solution, now called rich solution, flows through VLF2 to the PSSA pond within VLF2. Rich solution from the VLF2 PSSA is pumped to the ADR2 facility where the solution passes through a series of carbon adsorption columns, and the gold in solution is adsorbed onto the activated carbon. The carbon is then sent to the carbon handling facility to be stripped of the gold, regenerated, and then returned to the process. After passing through the gold recovery process the solution no longer contains high quantities of gold and is called spent solution. Sodium cyanide and caustic soda is added to the spent solution and returned to VLF2 to continue the leaching process.

The External Storage Pond (ESP) is used to contain excess solution in the event of an emergency. Process solution can be pumped from VLF1 to the ESP should the need arise. CC&V has not transferred process solutions to the ESP during this recertification period.

The following list identifies the cyanide facilities constructed or modified since the 2020 Recertification Audit.

- CC&V constructed a booster station for VLF2 at the 10,000-foot elevation to transfer spent solution to the higher levels of VLF2. The work was completed in 2021; however, the booster station was not operational at the time of the site inspection. The booster station consists of three transfer pumps, spent solution pipelines, and a new 3-MW generator that will operate the pumps in the event of a power outage.
- Phase 3 of VLF2 was constructed in 2022 and 2023, but was not operational at the time of the site inspection. The expansion included additional lined pad area and a dedicated internal PSSA.
- CC&V replaced the south cyanide storage tank at ADR1 with one of the decommissioned cyanide storage tanks from their mill. The old tank and the relocated tank have the same volume – 20,000 gallons. At the time of the site inspection, the tank was in place and the majority of the piping connections were completed; however, the tank was not yet in service.

In the past, CC&V received cyanide briquettes; however, they have removed the cyanide mixing equipment at ADR1 and ADR2 and only received liquid sodium cyanide during this recertification period. The liquid sodium cyanide is delivered to CC&V via isotainers on delivery trucks specifically designed to safely transport the liquid cyanide. CC&V does not have cyanide mixing or destruction process on site. CC&V did not experience any significant cyanide releases or exposures during this recertification period.

Figure 1. Regional Map

4. GOLD MINING VERIFICATION PROTOCOL

4.1 Principle 1 – Production and Purchase

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

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

FINDING:	BASIS FOR FINDING:
The operation is in full compliance with Standard of Practice 1.1.	CC&V is in full compliance with Standard of Practice 1.1, requiring the operation 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. CC&V purchased sodium cyanide 30% (nominal) aqueous solution cyanide from Cyanco Company, LLC (Cyanco) in Winnemucca during the 2023 Recertification Audit Period. The Master Commodities Agreement between Cyanco and CC&V became effective on March 19, 2020 and has an end date of December 31, 2025. The auditors reviewed a representative sample of Bills of Lading (BOLs) throughout the Recertification Audit Period to confirm that CC&V has purchased the sodium cyanide solely from Cyanco's Winnemucca cyanide production facility. Cyanco originally became a signatory to the Code November 3, 2005 and was recertified January 13, 2023

4.2 Principle 2 – Transportation

Protect Communities and the Environment during Cyanide Transport

Standard of Practice 2.1: *Require that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training, and emergency response.*	
FINDING: The operation is in full compliance with Standard of Practice 2.1.	BASIS FOR FINDING: CC&V is in full compliance with Standard of Practice 2.1, requiring that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training and emergency response. CC&V maintains the BOLS for sodium cyanide delivered. The BOLs confirm that only TransWood Inc. transported sodium cyanide to CC&V's ADR1 and ADR2 plants from Cyanco's Swan Ranch Transloading Facility in Cheyenne, Wyoming. Cyanco is responsible for the cyanide solution from the production facility in Winnemucca, Nevada to the Swan Ranch Transloading Facility in Cheyenne, Wyoming. Based on review of a representative sample of BOLs, sodium cyanide was transported solely by Cyanco from Winnemucca, Nevada to the Swan Ranch Transloading Facility and solely by TransWood Inc. from the Swan Ranch Transloading Facility to CC&V's ADR plants. Cyanco North American Rail & Truck Supply Chain originally became a signatory to the Code August 18, 2010 and was recertified July 27, 2022. TransWood Inc. originally became a signatory to the Code June 22, 2006 and was recertified November 30, 2022.

4.3 Principle 3 – Handling and Storage

Protect Workers and the Environment during Cyanide Handling and Storage

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

FINDING:	BASIS FOR FINDING:
The operation is in full compliance with Standard of Practice 3.1.	CC&V is in full compliance with Standard of Practice 3.1; design and construct unloading, storage and mixing facilities consistent with sound accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures. CC&V has designed and constructed the sodium cyanide unloading and storage facilities in each area (ADR1 and ADR2) in accordance with sound engineering practices as previously reported in Cyanide Code Audit Reports. Each facility has two vertical 20,000-gallon cyanide storage tanks located outside. No changes have been made to the unloading and storage facilities since the previous recertification audit, except for CC&V replaced the south cyanide storage tank at ADR1 with one of the decommissioned cyanide storage tanks from their mill. The old tank and the relocated tank have the same volume – 20,000 gallons. CC&V only receives sodium cyanide solution and therefore, does not have cyanide mixing facilities for solid cyanide. To minimize human exposure during cyanide unloading and storage, cyanide unloading and storage facilities are located outside and within the secured area of the mine. The gate to access the cyanide unloading and storage facilities at ADR1 and ADR2 are locked with a sign stating “Do Not Enter, Authorized Personnel Only” and that personal protective equipment (PPE) is required. CC&V places signage in front of the cyanide unloading area to make employees aware during a cyanide unloading event. As indicated in the 2020 recertification audit report and confirmed by the site inspection, the cyanide offloading and storage areas at ADR1 and ADR2 are located away from the offices and any areas where employees may congregate. The nearest communities are Victor and Cripple Creek which are located approximately two miles from cyanide unloading and storage areas. No surface water bodies are located nearby. The two cyanide unloading areas at CC&V are constructed of concrete pads, which provide an adequate barrier to prevent seepage to the subsurface. Underneath the concrete pads at both unloading areas is a linear low-density polyethylene (LLDPE) membrane liner that ties into the VLF1 and VLF2 liners and provides tertiary containment. No changes or modifications have occurred to the concrete pads or liner since the 2020 Recertification Audit. The concrete pads at ADR1 and ADR2 unloading areas were observed to be in good condition during the site inspection portion of the 2023 Recertification Audit. CC&V installed level indicators with alarms in the cyanide storage tanks to prevent overfilling. The level indicators are visually inspected monthly in accordance with CC&V’s preventive maintenance schedule. In addition, the cyanide storage tanks are connected and operate in parallel; therefore, the level indicators on the tanks are redundant. If the level indicators are not reading the same, operations personnel will write a work order. The auditors observed tank levels at the storage tank areas and control room screens to verify the indicators were functioning. The cyanide storage tanks at ADR1 and ADR2 are located within concrete secondary containment areas. The auditors observed the containment areas to be in good condition; thereby, preventing seepage to the subsurface.

Standard of Practice 3.1: *Design and construct unloading, storage and mixing facilities consistent with sound accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.*	
	Underneath the concrete secondary containment areas at both facilities is a LLDPE membrane liner that ties into the VLF1 and VLF2 liners and provides tertiary containment. The cyanide storage tanks at ADR1 and ADR2 are located outdoors to prevent the buildup of hydrogen cyanide (HCN). No incompatible materials, such as acids, oxidizers, and explosives, were stored in the cyanide storage tank containment areas.

Standard of Practice 3.2: *Operate unloading storage and mixing facilities using inspections, preventative maintenance, and contingency plans to prevent or contain releases and control and respond to worker exposures.*	
FINDING: The operation is in full compliance with Standard of Practice 3.2.	BASIS FOR FINDING: CC&V is in full compliance with Standard of Practice 3.2; operate unloading storage and mixing facilities using inspections, preventative maintenance, and contingency plans to prevent or contain releases and control and respond to worker exposures. CC&V only receives liquid sodium cyanide in isotainers on delivery trucks. No solid cyanide is received at CC&V. The TransWood delivery trucks are only on site for the duration of the unloading event. Once unloaded, the delivery trucks and isotainers leave the mine site. No empty cyanide containers were observed on site during the 2023 Recertification Audit. The cyanide unloading procedures in the Code Procedures Task Training Outline state that the TransWood driver is responsible for using fresh water to rinse the valve area on the isotainer and performing a general inspection of the entire cyanide offload area. The workplace examination includes a review of the cyanide areas including hose, valves, and couplings. If a deficiency is observed during these checks, tests, or examinations, the area supervisor creates a workorder for maintenance to perform repairs. The delivery truck driver is responsible for inspecting and maintaining their cyanide delivery truck and equipment, including shut off valves and hoses. The ADR operator and TransWood driver are required to both be present during the connection and disconnection of the unloading event. During the unloading of the cyanide, the TransWood driver stays present at the truck and CC&V has cameras to observe the unloading event remotely. The procedures specify the required PPE that the cyanide delivery truck driver must be wearing during the unloading event. The TransWood driver is responsible for cleaning up any cyanide residue that is on the truck valves, hoses, and connections. The procedure outlines response, clean up, and remediation steps for cyanide spills on and off containment. Cyanco adds the red colorant dye to the liquid cyanide prior to shipping the cyanide. The auditors were unable to observe the color of the reagent-grade cyanide since the cyanide is added below the liquid level in the process tanks, but verified compliance by reviewing the Master Commodities Agreement between Cyanco and CC&V and conducting interviews with the Process Supervisors. To verify compliance with the offload procedures, the auditors observed a cyanide unloading event at ADR2 and interviewed an ADR operator and TransWood delivery truck driver. Both demonstrated an understanding of the requirements, where to go for the emergency shut off, how to prevent and contain releases, and how to respond to a potential worker exposure.

4.4 Principle 4 – Operations

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

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

FINDING:	BASIS FOR FINDING:
The operation is in full compliance with Standard of Practice 4.1.	CC&V is in full compliance with Standard of Practice 4.1; implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures. CC&V has developed and implemented written management and operating plans and manuals, and standard operating procedures (SOPs). SOPs cover the safe operation of the entire cyanide management system at CC&V. The procedures include process descriptions, operating tasks, inspections, maintenance, and shutdown procedures. In addition to the plans and SOPs, CC&V's Mine Permit and Water Discharge Permit authorize the construction and stipulate operating requirements for CC&V's cyanide facilities. To verify compliance, the auditors reviewed several SOPs, interviewed operations personnel, and completed a site inspection for evidence of implementation. Procedure 18 – Water Balance Management with the Cyanide Code Procedures Task Training Outline describes the operating parameters for the PSSAs including the maximum operating levels, action levels, reporting levels and remaining capacities if an action level is reached. This procedure also includes overflow direction of the PSSAs, actions to take when a level exceeds a limit, and the operating parameters for rich, spent, and enrichment pumps. CC&V's Mine Permit includes the design storm events and geotechnical considerations taken into account for the design of the VLFs and for the water balance. The Water Discharge Permit authorizes water discharges from two outfall locations: 001A to Arequa Gulch from a sedimentation pond and 005B for treated process water from the ESP to Arequa Gulch. The permit specifies discharge limitations, including daily maximum weak acid dissociable (WAD) cyanide concentration, and monitoring requirements. CC&V has developed and implemented inspection and preventive maintenance (PM) programs which include practices for safe and environmentally sound operation of their cyanide facilities. CC&V uses a computer-based system for identifying, assigning responsibility, scheduling, and tracking the completion of the PM activities. The PM program includes elements necessary for cyanide safety (i.e., HCN monitors, pH probes, cyanide pumps, back-up generators, storage tanks, pond level indicators, and others). Operations, maintenance, and environmental personnel conduct routine inspections of the VLFs, ADR plants, pipelines, and leak detection systems. Inspections are conducted by environmental, operations, and maintenance personnel and include: • Weekly inspection of VLF1, VLF2, and ESP leak detection systems and PSSA and ESP levels. • Daily review and documentation of process solution flows, pH, cyanide concentrations, and PSSA and ESP water levels.

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

- Daily workplace pre-shift inspections that include checking the cyanide systems for leaks and salt growth on pipes, valves, fittings, pumps, and tanks, standing solution in sump areas, cracks in secondary containment areas, and ensuring cyanide system drain valves are closed and handles removed.
- VLF daily walkthroughs include inspections for piping/leach plumbing leaks, safety concerns on dump faces, leaks on side slopes, visible ponding, leak detection systems, and VLF signage.
- Monthly mechanical and electrical inspections of the ADR plants
- Quarterly inspections of stormwater diversion channels

These inspections are documented on hard copy forms or reports that include space for personnel to note deficiencies or problems observed during the inspection. The auditors reviewed a representative sampling of completed inspection records for the recertification period and they demonstrate that inspections were completed as scheduled and ensure that the cyanide facilities are operated in a safe and environmentally sound manner. In addition, the auditors observed that CC&V inspects its cyanide facilities on an established frequency that is sufficient to ensure and document that they are functioning within design parameters.

Operations personnel conduct daily visual inspections of tanks for signs of corrosion and leakage and maintenance personnel perform ultrasonic wall thickness testing of the cyanide storage tanks on an annual basis. CC&V also hires a contractor on an annual basis to complete external visual inspections of the two cyanide storage tanks at ADR1 and the two cyanide storage tanks at ADR2.

Secondary concrete containment areas are inspected each shift by operations personnel and monthly by maintenance personnel for integrity, salt build up, cracking, and presence of fluids. Secondary containments were observed during the audit as being in good condition and drains on cyanide storage tanks and piping were either blind-flanged or equipped with valves locked in the closed position. Secondary containment areas are not equipped with drains.

PSSA and ESP levels are continuously displayed and monitored in CC&V's control rooms in ADR1 and ADR2. Levels are recorded on the ADR Daily Solution Report forms once each shift and compared to the operating and reporting limits to ensure that water levels do not exceed the defined limits.

CC&V's PM program has been designed and implemented to ensure that equipment and devices function as necessary for safe cyanide management. PM records were readily available for the recertification period. The auditors reviewed a representative sampling of completed PM records to verify that the preventive and corrective maintenance program has been implemented as described. CC&V's PM program includes monthly inspection and calibration of fixed HCN monitors, pH meters, and pond/caisson level indicators and annual non-destructive testing and external inspection of cyanide storage tanks.

CC&V 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, which is overhead line power from the local grid, is interrupted. CC&V maintains diesel-powered generators to run critical equipment, including solution pumps for VLF1 and VLF2, VLF2 Booster Station, and ADR plants. The back-up power supply consists of 11 generators. The maintenance group performs routine PMs on the generators including checks of engine oil, fuel, coolant, and battery fluid levels; operation of the generators; and quantity of fuel added during the PM. Records were reviewed and found to be complete.

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

	CC&V follows the Newmont corporate Management of Change (MoC) Standard and Guideline for reviewing proposed process and operational changes and modifications to existing facilities. CC&V has developed and implemented a Change Management System to meet the requirements of the Newmont corporate MoC Standard. The purpose of this system is to evaluate changes to processes, materials, equipment, systems, programs, and resources for potential hazards to worker health and safety and the environment and control or eliminate those hazards prior to implementing the change. Changes to CC&V's cyanide facilities that occurred during the recertification period were evaluated under CC&V's MoC process or through Newmont's capital project approval process. Both processes require approval by environmental and safety managers. CC&V has developed cyanide management contingency procedures for non-standard operating situations such as an upset in the water balance, problems identified by facility monitoring or inspection, and temporary closure or cessation of operations. Procedure 18 – Water Balance Management in the Cyanide Code Procedures contains procedures to address upset situations in the operational water balance. The procedures describe maximum operating levels, action levels, reporting levels, and PSSA capacities. Permit M-1980-244 for Mine Life Extension 2, Section 14.6 addresses temporary cessation of operations. During periods of temporary cessation of operations, CC&V will maintain adequate staff to continue to circulate process solutions and monitor and maintain water balances associated with the VLFs. Power and emergency back-up power will be maintained. Remaining sodium cyanide on site will be consumed. Once consumed, no additional sodium cyanide will be delivered to site or added during these periods. All monitoring and reporting activities will continue during temporary cessations of operations.

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

FINDING:	BASIS FOR FINDING:
The operation is in full compliance with Standard of Practice 4.2.	CC&V is in full compliance with Standard of Practice 4.2; introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings. CC&V no longer operates a milling operation with cyanide addition.

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

FINDING:	BASIS FOR FINDING:
The operation is in full compliance with Standard of Practice 4.3.	CC&V is in full compliance with Standard of Practice 4.3; implement a comprehensive water management program to protect against unintentional releases. CC&V continues to use the GoldSim water balance model that includes the two VLFs and the two ADR Plants. CC&V uses a third-party contractor to incorporate changes to the model when needed. CC&V had their third-party contractor add VLF2 Phase 3 and its PSSA to the water balance model to project future pond levels and

	water supply requirements. CC&V updates the operational data and weather data and runs simulations on a quarterly basis. CC&V uses the output from the water balance model simulation to ensure that the projected PSSA and ESP levels will not reach an action or reporting limit, to ensure enough water is available for production purposes, and to project how much water is needed for future operations. The simulation output graphs display observed/actual data and simulated/future data. The GoldSim model is comprehensive in that it includes the appropriate facilities and processes. The model uses spreadsheet input data that CC&V updates. Model inputs include meteorological data, freshwater addition, process solution flows, mine production data, ore moisture content, and operational pond data. The model is also probabilistic in that inputs and outputs are distributions rather than single values. CC&V maintains two weather stations: Rigi and Grassy Valley. Due to the proximity of the Rigi weather station to the VLFs, the data from the Rigi weather station is used in the GoldSim model. CC&V downloads the data monthly and uses the data for various reporting purposes. The precipitation is directly measured on a daily basis and the weather station software uses the collected data to calculate the evaporation rate. CC&V has configured the VLFs with engineered diversion structures so that stormwater runoff from the upgradient areas is diverted around the VLFs. Therefore, stormwater runoff from upgradient watersheds is not included in the water balance model. Solution losses due to evaporation and water uptake in the ore that is placed on the VLFs are included in the water balance model. The VLFs and associated ponds are operated as zero discharge facilities; therefore, the water balance model does not include seepage to the subsurface or discharges to surface water since CC&V does not discharge process solutions. CC&V runs simulations using their GoldSim model that evaluate the potential effects of power outages or equipment failure. The model contains a Power Failure Simulation module that includes the settings to simulate a power outage. Power outage parameters include outage frequency and duration of the power failure. Water balance model information was verified through a review of the water balance input data spreadsheets, a demonstration of the GoldSim water balance model, and review of simulation output graphs. CC&V has installed level indicators in the four PSSAs in VLF1 and the PSSA in VLF2. The pond levels appear in and are continuously monitored in the ADR1 and ADR2 control rooms. The level probes are calibrated on a monthly PM schedule. In addition, operations personnel monitor and document the PSSA levels once per shift (two times per day). The ESP level is recorded once per day. The action level is 60% of the maximum pond capacity and the regulatory reporting limit is 80% of the maximum pond capacity. When the action level is reached, operations personnel must notify the Process Superintendent and the Chief Metallurgist, who will evaluate the situation and provide steps to lower the water level. When the regulatory reporting limit is reached, CC&V must notify the Colorado Division of Reclamation, Mining, and Safety (DRMS). By operating the PSSAs below the action level and maintaining the ESP dry, CC&V ensures that adequate storage capacity is available for power outages or equipment failures as simulated using the GoldSim water balance model. Auditors reviewed a representative sampling of solution reports and inspection forms to confirm that the PSSA level monitoring and inspections were completed and levels remained below the regulatory reporting level during the recertification period.

Standard of Practice 4.4: *Implement measures to protect birds, other wildlife, and livestock from adverse effects of cyanide process solutions.*	
FINDING: The operation is in full compliance with Standard of Practice 4.4.	BASIS FOR FINDING: CC&V is in full compliance with Standard of Practice 4.4; implement measures to protect birds, other wildlife, and livestock from adverse effects of cyanide process solutions. CC&V has implemented operational controls to ensure that wildlife, birds, and livestock do not access open waters where weak acid dissociable (WAD) cyanide concentration exceeds 50 milligrams per liter (mg/l). The cyanide facilities that could contain process solution with WAD cyanide levels potentially exceeding 50 mg/l are the ESP and any ponding of spent solution on VLF1 or VLF2. The PSSAs were designed and are operated as subsurface storage areas and do not have open water. The Valley Leach Facility SOP requires Leach Pad operators to inspect the VLFs daily for operational issues such as blown drip lines, leaking headers, and ponding. This SOP and Procedure 23 – Leach Pad Tasks in the Cyanide Code Procedures require Leach Pad operators to remove any ponding larger than 3 feet by 3 feet on the VLFs and list several methods for addressing ponding. When ponding is observed, operators will implement corrective measures to alleviate the ponding, such as turning off the flow of spent solution to the area, ripping surface soil to increase drainage, covering with bird balls or netting. CC&V places drip lines on the VLFs that are equipped with emitters that either sit on the surface or are buried just under the surface of the VLFs to prevent overspray of solution off the VLFs. CC&V may use misters on flat areas of the VLFs away from edges to prevent overspray off the VLFs. In addition, CC&V has started using injection wells on VLF1. The use of injection wells prevents ponding. The auditors did not observe any ponding on the VLFs during the site inspection. The ESP only contains process solution during an upset condition at the VLF1 PSSAs or barren tank. In accordance with CC&V's Wildlife Protection Plan, the ESP is surrounded with 8-foot-high chain-link fencing to prevent wildlife from accessing the ESP. In the event process solutions are transferred to the ESP, CC&V will deploy bird deterrence methods, such as bird balls, and/or sonic devices, until the process solutions are removed from the ESP as specified in CC&V's Wildlife Protection Plan. CC&V has a supply of bird balls on site so that they can deploy the bird balls when needed. In addition, CC&V has developed a procedure for the destruction of cyanide in the ESP with hydrogen peroxide to lower WAD cyanide levels below 50 mg/l as a wildlife protection measure. The ESP only contains process solution during an upset condition. Water Discharge Permit No. CO0043648 requires monitoring for WAD cyanide if process solution is being discharged from the ESP. The ESP has not received any process solution during the recertification period. It has only contained enough precipitation/freshwater to help maintain the pond bottom liner. The auditors reviewed data on the levels in the VLF1 Phase 2 PSSA, which is the PSSA that overflows to the ESP, and confirmed that levels in the VLF1 Phase 2 PSSA remained below the overflow, indicating that process solutions were not introduced to the ESP. In addition, the auditors interviewed environmental personnel to confirm that no process solution had been transferred to the ESP during the recertification period. CC&V personnel are required to report wildlife sightings and mortalities to CC&V's environmental personnel. Based on review of wildlife mortalities for the recertification period and on discussions with CC&V's environmental staff, no wildlife mortalities due to process solutions occurred during the recertification period. CC&V'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 due to process solutions.

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

FINDING:	BASIS FOR FINDING:
The operation is in full compliance with Standard of Practice 4.5.	CC&V is in full compliance with Standard of Practice 4.5; implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water. CC&V operates with zero discharge of process solutions. No discharges of cyanide solutions to surface waters occurred during the recertification period. Under Water Discharge Permit No. CO0043648, CC&V is authorized to discharge from two outfalls: 1) Outfall 001A discharges to the Arequa Gulch from the sedimentation pond; and 2) Outfall 005B discharges treated water from the ESP to the Arequa Gulch only if heavy precipitation exceeds the ESP's capacity. The auditors reviewed monthly Discharge Monitoring Reports (DMRs) for the recertification period. Outfall 001A discharged twice during the recertification period in August 2022 and May 2023. The WAD cyanide level in the discharged water was below the detection limit of 5 micrograms per liter (μg/l). Outfall 005B did not discharge during the recertification period. CC&V does not have any indirect discharges of cyanide to surface waters. CC&V monitors for free and WAD cyanide at five compliance points downstream from its cyanide facilities. CC&V samples these locations on a quarterly basis. The auditors reviewed the quarterly data from third quarter 2020 through third quarter 2023, which showed that the sample locations were either dry, frozen, or if water was flowing, the free cyanide was less than the detection limit of 5 μg/l.

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

FINDING:	BASIS FOR FINDING:
The operation is in full compliance with Standard of Practice 4.6.	CC&V is in full compliance with Standard of Practice 4.6; implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater. CC&V has implemented measures to protect groundwater beneath and immediately down-gradient of the operation. CC&V'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. CC&V has implemented inspection and monitoring programs to ensure water management and leak detection systems are functioning properly, and that water quality is being protected. CC&V has installed and samples groundwater monitoring wells and reviews the analytical data to detect if cyanide seepage occurs. CC&V is required to conduct quarterly groundwater monitoring in the 10 monitoring wells located downgradient of the cyanide facilities. Samples are collected from the wells and analyzed for the list of parameters defined in Water Discharge Permit No. CO0043648, including WAD cyanide. CC&V submits the sampling results to Colorado Division of Reclamation, Mining, and Safety (DRMS) on a quarterly basis. The Colorado Groundwater Standard for WAD cyanide is 0.2 mg/l, which is based on the federal drinking water standard. Review of thirteen quarterly reports during the recertification period indicated no detectable WAD

Standard of Practice 4.6: *Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.*	
	cyanide (i.e., <0.005 mg/L) in the 10 groundwater monitoring wells located downgradient of CC&V's cyanide facilities. The groundwater beneath and downgradient of the mine site is not used.

Standard of Practice 4.7*: Provide spill prevention or containment measures for process tanks and pipelines.*	
FINDING: The operation is in full compliance with Standard of Practice 4.7.	BASIS FOR FINDING: CC&V is in full compliance with Standard of Practice 4.7; provide spill prevention or containment measures for process tanks and pipelines. CC&V has provided containment for all cyanide unloading areas and cyanide storage and process solution tanks. Containment measures include concrete secondary containment areas for the cyanide storage tanks and process solution tanks within the ADR plants. A geomembrane liner, keyed to the liner systems at VLF1 and VLF2 areas underlies the entire process areas, including ADR1 and ADR2 and serves as tertiary containment for the concrete secondary containment areas. CC&V does not receive solid cyanide and therefore does not have any cyanide mixing facilities. The auditors observed the spill prevention and containment measures for the cyanide unloading area, cyanide storage tanks, and ADR plants to be in good condition and did not contain debris or extraneous materials that would reduce the containment area capacities. No changes or modifications have been made to the secondary containment areas for the cyanide storage tanks and process solution tanks since the previous recertification audit. The south cyanide storage tank at ADR1 was replaced with the cyanide storage tank that was in use at the High Grade Mill since the mill is no longer in operation. Since the tanks are the same volume, the capacity of the cyanide storage tank secondary containment area at ADR1 is adequate as stated in previous recertification audit reports. CC&V has procedures in place to prevent discharges of cyanide solution or cyanide-contaminated water that is collected in secondary containment areas to the environment. Procedure 16 – Inspection & Removal of Accumulated Precipitation from Cyanide Secondary Containment Areas addresses how operations personnel are to manage liquids that collect in cyanide secondary containment areas. Measures to prevent discharges from secondary containment areas include sumps with dedicated pumps that are equipped with level activated float switches to automatically turn on. These pumps return liquids to the process solution tanks. The pumps can also be operated in manual mode. These containment areas and sumps are not equipped with drains. CC&V has provided spill prevention or containment measures for all cyanide process solution pipelines to collect leaks and prevent releases. No changes have been made to the secondary containment measures for the cyanide pipelines since the previous recertification audit. The auditors observed the spill prevention and containment measures in several locations during the 2023 Recertification Audit site inspection and found them to be in good condition. The solution pipeline containment measures include concrete flooring and sumps within the plant buildings; outdoor piping is located above liners that tie into the VLF1 and VLF2; spent and rich solution pipelines are constructed of carbon steel and are located within the VLF liner footprints; and, reagent grade cyanide solution piping from the cyanide delivery trucks to the cyanide storage tanks and into the ADR plants are located above the cyanide storage tanks concrete secondary containment areas.

Standard of Practice 4.7: *Provide spill prevention or containment measures for process tanks and pipelines.*	
	The auditors observed that the cyanide storage tanks and process tanks at CC&V are constructed of carbon steel; pipelines transferring reagent grade sodium cyanide solution are constructed of stainless steel; pipelines for process solutions containing cyanide at lower concentrations are constructed of carbon steel; the spent solution distribution headers and emitter lines on the VLFs are constructed of high-density polyethylene (HDPE). These materials are compatible with cyanide and high pH conditions.

Standard of Practice 4.8: *Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.*	
FINDING: The operation is in full compliance with Standard of Practice 4.8.	BASIS FOR FINDING: CC&V is in full compliance with Standard of Practice 4.8; implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications. CC&V has implemented quality assurance and quality control (QA/QC) programs for the construction and modification of their cyanide facilities during the recertification period. New construction and modifications that occurred since the previous recertification audit include: • Construction of a booster station for VLF2 at the 10,000-foot elevation to transfer spent solution to the higher levels of VLF2. The booster station consists of three pumps, spent solution pipelines, and a new back-up generator. The QA/QC program for this project included radiographic testing, weld inspections, and maintaining a weld log for solution piping; concrete pre-pour checks and concrete compressive strength testing for the thrust blocks that support the solution piping, footings, and foundations; calibration of instrumentation; and, a Fuel Tank & Rupture Basin Leak Test Report for the generator's fuel tank. • Construction of VLF2 Phase 3, which included additional lined pad area and a dedicated internal PSSA. CC&V contracted NewFields to provide field engineering, Construction Quality Assurance, Construction Quality Control, and inspection services for this project. The auditors reviewed the Record of Construction Report prepared by NewFields, which detailed the QA/QC program implemented and testing results. • Replacement of the south cyanide storage tank at ADR1 with one of the decommissioned cyanide storage tanks from the mill. At the time of the site inspection, the tank and majority of the piping was in place; however, the tank was not yet in service and not all of the QA/QC documentation had been finalized. Review of the final QA/QC documentation for this modification will need to be completed during the next recertification audit. The QA/QC programs for the construction of the VLF2 booster station addressed the suitability of materials of the pump, piping, valves, and instrumentation. The Record of Construction Report for VLF2 – Phase 3 Stage A.2 that was prepared by NewFields addressed the suitability of the different fill materials and synthetic liner, the adequacy of soil compaction for earthworks, and the installation of the synthetic liner. The QA/QC activities addressed clearing and grubbing, underdrains, site grading, subgrade preparation, leak detection trench, soil liner fill, geomembrane liner, anchor trench, drain cover fill, and high-volume solution collection system. For the VLF2 booster station and VLF2 – Phase 3 Stage A.2, appropriately qualified personnel reviewed and approved the construction. The Record of Construction Report for VLF2 – Phase 3 Stage A.2 was signed and stamped by a professional engineer registered in the State of Colorado. The various documents for the VLF2

Standard of Practice 4.8: *Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.*	
	booster station project were either stamped by a professional engineer registered in the State of Colorado or completed by certified professionals (radiographic testing completed by a Radiographer II) or third-party testing firms (concrete testing completed by a construction materials testing firm). CC&V has retained electronic copies of the QA/QC documentation for its cyanide facilities on Newmont's network. Based on review of the retained documentation for the 2023 Recertification Audit, CC&V maintains QA/QC documentation for cyanide facilities that have been constructed or modified.

Standard of Practice 4.9: *Implement monitoring programs to evaluate the effects of cyanide use on wildlife, and surface and groundwater quality.*	
FINDING: The operation is in full compliance with Standard of Practice 4.9.	BASIS FOR FINDING: CC&V is in full compliance with Standard of Practice 4.9; implement monitoring programs to evaluate the effects of cyanide use on wildlife, and surface and groundwater quality. CC&V has developed written procedures for monitoring activities, including surface water and groundwater quality and wildlife monitoring. The Water Monitoring Quality Assurance Project Plan and Field Sampling Guidance (the Guidance) includes groundwater and surface water sampling locations, analytical constituents list, field technician duties, sampling frequency, collection and preservation of samples, pond sampling, and well sampling procedures. The Wildlife Protection Plan describes procedures for wildlife monitoring and reporting wildlife sightings, incidents, and mortalities. The Guidance was developed and is reviewed and maintained by CC&V environmental professionals. The Guidance is reviewed and updated as needed, and at least every 3 years. CC&V submits changes in the Guidance, and submits the Guidance with mine permit amendments, to DRMS. DRMS reviews and approves the changes through a technical revision or with the amendment package. The Guidance includes blank field sampling logs for groundwater and surface water sampling. The field logs are completed and maintained for each sample collected. The field logs include date, time, weather condition, sample method, field data (including water temperature, conductivity, dissolved oxygen, and pH) and conditions encountered during sampling. Completed field sheets are included in the quarterly water monitoring reports that CC&V submits to DRMS. In the opinion of the audit team, CC&V conducts monitoring at frequencies adequate to characterize and identify changes in a timely manner in the groundwater, surface water, and leak detection systems. In addition, the monitoring frequencies have been established by the DRMS and the Colorado Department of Public Health and Environment (CDPHE). Groundwater and surface water samples are collected and analyzed, and leak detection systems are monitored on frequencies specified in these permits. Wildlife monitoring is continuous while employees are outside on the property and observations are documented.

4.5 Principle 5 – Decommissioning

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

Standard of Practice 5.1: *Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock, and the environment.*	
FINDING: The operation is in full compliance with Standard of Practice 5.1.	BASIS FOR FINDING: CC&V is in full compliance with Standard of Practice 5.1; plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock and the environment. CC&V has developed written procedures for the decommissioning of its cyanide facilities at the cessation of operations. CC&V operates under Mine Land Reclamation Permit M-1980-244. Amendment 13 to this permit includes the addition of Phase 3 to VLF2, a new PSSA for Phase 3, and an updated reclamation plan. The Reclamation Plan contained in Amendment 13, Exhibit E contains CC&V's decommissioning and reclamation procedures for the VLFs and other cyanide facilities. When active leaching ceases, CC&V plans to use the remaining cyanide on site and then rinse the VLFs twice using recirculated process solution and fresh water. CC&V will evaluate if complete removal of cyanide by rinsing with hydrogen peroxide is necessary or if a targeted average WAD cyanide concentration can be achieved with the initial two rinses. After achieving the targeted WAD cyanide concentration, the VLF liner systems will be perforated to prevent excessive accumulation of stormwater infiltration in the neutralized ore and allow the stormwater to pass through the ore on the VLFs and into the underlying ground. Pipes, pumps, and other structures will be decontaminated and removed. Process tanks and piping will be rinsed, dismantled, and removed. Exhibit E in Amendment 13 provides a general timeline for the order of the decommissioning and reclamation tasks and an approximation on how long each task will take. CC&V also maintains a cost estimation spreadsheet that contains a schedule to project when activities will occur and funds will be spent. CC&V updates their decommissioning and reclamation plans each time CC&V seeks an amendment to Permit M-1980-244 since the requested changes must be incorporated into the Reclamation Plan. Amendment 13, with the updated Reclamation Plan in Exhibit E, is most recent Amendment and Reclamation Plan and was approved on December 23, 2020.

Standard of Practice 5.2: *Establish a financial assurance mechanism capable of fully funding cyanide related decommissioning activities.*	
FINDING: The operation is in full compliance with Standard of Practice 5.2.	BASIS FOR FINDING: CC&V is in full compliance with Standard of Practice 5.2; establish a financial assurance mechanism capable of fully funding cyanide related decommissioning activities. CC&V has developed a cost estimate to fully fund a third-party to perform the decommissioning and reclamation tasks identified in their Reclamation Plan. CC&V uses the Standardized Reclamation Cost Estimator (SRCE) spreadsheet to estimate material volumes, structures and piping, and time requirements to complete the decommissioning and reclamation tasks. CC&V then uses the SRCE data to calculate the estimated closure costs using a Closure Cost Estimation Template (CCET). CC&V reviews and updates their closure cost estimate on an annual basis. The most recent update is dated November 2022. CC&V submits an annual report to the DRMS, which includes an updated closure cost estimate. The report accounts for minor changes, such as inflation and reclamation activities completed during the reporting year. Additions and major modifications to CC&V operations, including their cyanide facilities, must be approved through an amendment to Permit M-1980-244. Amendment applications include an updated cost estimate that incorporates the proposed addition or modification. The applications are submitted to and approved by DRMS. The most recently approved amendment is Amendment 13, which was approved on December 23, 2020. CC&V has established a financial mechanism approved by the applicable jurisdiction, DRMS, to cover the estimated closure costs of the mine site, including cyanide-related decommissioning activities. The most recent annual report, dated April 17, 2023, includes a section titled “Reclamation/Closure Liability and Financial Warranty”. This section lists the amount of financial warranty that CC&V had in place at the beginning of 2022, the required estimated liability at the end of 2022, and the bonds that CC&V holds to meet that financial liability. CC&V currently holds several bonds and a Letter of Credit to meet the required financial warranty.

4.6 Principle 6 – Worker Safety

Protect Workers' Health and Safety from Exposure to Cyanide

Standard of Practice 6.1: *Identify potential cyanide exposure scenarios and take measures as necessary to eliminated, reduce and control them.*	
FINDING: The operation is in full compliance with Standard of Practice 6.1.	BASIS FOR FINDING: CC&V is in Full Compliance with Standard of Practice 6.1 requiring that the site identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them. CC&V has developed and implemented procedures to describe the management and operation of its cyanide facilities. The procedures cover the safe operation of the cyanide facilities, decontamination of cyanide equipment prior to maintenance work, and entry into confined spaces. Twenty-five of the cyanide related procedures are contained in the Cyanide Code Procedures Task Training Outline. The site also has a confined space entry standard. The procedures outline the PPE requirements, operator responsibilities, and procedures for using and handling cyanide. PPE requirements are also posted on signs in cyanide facilities. The New Hire Training and the Cyanide Code Procedures Task Training Outline describe the procedures for work area inspections. Both ADR plants have Workplace Examination forms that include cyanide facilities and associated equipment. CC&V's New Hire Training presentation outlines standard PPE requirements at the site, which includes a hard hat, safety glasses with side shields, high visibility clothing, and a radio. PPE requirements are also posted on signs in the cyanide facilities. Additional PPE required for a cyanide unloading event includes gloves, chemical suit, HCN monitor, and a face shield. CC&V considers worker input into the development and modification of procedures through various mechanisms and encourages an open-door policy for employees to provide input. Every Wednesday is a training day in the Process Department where a different SOP is reviewed. This is an open forum for employees to provide input and make suggestions. Area supervisors note potential changes and can modify the procedures as required. Process Trainers in the work areas are responsible for updating and finalizing the procedures. In addition, CC&V has a Continuous Improvement Program on site that allows employees to make suggestions. CC&V designates an employee with the continuous improvement role that manages this program

Standard of Practice 6.2: *Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.*	
FINDING: The operation is in full compliance with Standard of Practice 6.2.	BASIS FOR FINDING: CC&V is in full compliance with Standard of Practice 6.2 requiring that the site operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

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

	CC&V has determined the appropriate pH to limit the evolution of hydrogen cyanide gas during production activities. Cyanide Code Procedures, Procedure 9 - HCN Gas states that pH in the process areas must be maintained at a level equal to, or greater than 9.5 to limit the production of HCN. The procedure outlines the requirements for monitoring HCN with HCN gas monitors and adding caustic solution, if needed, to increase pH levels. During the site inspection, the auditors reviewed the Daily Solution Reports to confirm that the process solutions are maintained above a pH of 9.5. Based on interviews with process personnel and trainers, the minimum pH requirement is well understood by process personnel. CC&V has installed fixed, ambient HCN monitors to confirm the controls to limit worker exposure to HCN gas are working. Cyanide Code Procedures, Procedure 10 – HCN Gas Monitors lists the areas where workers may be exposed to HCN gas in the ADR Plants and the PSES Plant. The locations of the fixed HCN monitors were confirmed during the site inspection of the 2023 Recertification Audit. The fixed monitors have two alarm set points: an initial alarm at 4.7 ppm and a high alarm at 10 ppm. Based on interviews with staff, at 4.7 ppm a visual alarm is activated in the process areas, an audible alarm sounds in the control room, and the location of detector that is alarming appears on the screens in the control rooms. At the 4.7 ppm alarm, personnel are to open the doors to the building, open ventilation louvers, and ensure exhaust fans are running. If one fixed monitor reaches 10 ppm, personnel are to evacuate and barricade the immediate affected area and follow the ventilation steps for the 4.7 ppm alarm. If two or more monitors reach 10 ppm, an audible alarm sounds in the process areas and all staff are to evacuate the building/area. An exclusion zone of at least 150 feet will be established around the affected building/area and access will be limited to Mine Rescue Team (MRT) personnel wearing the appropriate PPE. Access by others is prohibited until HCN levels decrease below 10 ppm. Portable HCN monitors are available for use by operations and maintenance personnel during normal operation or when performing specific tasks. The portable monitors are located in the ADR control rooms and the PSES control room. These portable monitors are set to alarm at 4.7 ppm and 10 ppm and are automatically bump tested each time the device is placed in the docking station. The portable monitors are also automatically calibrated by the system each month. If either the 4.7 or 10 ppm limit is exceeded, the portable monitor will activate audible, visual, and vibrating alarm signals. When the 4.7 ppm level is reached, the area is to be ventilated and evacuated. If the 10 ppm level is reached, the area is to be evacuated and only MRT personnel wearing approved breathing apparatus may enter until the HCN level decreases. The CC&V Process Electrical Group maintains all stationary HCN monitors and alarm systems. Monthly calibration records were available for stationary HCN monitors and are maintained in the Process Maintenance records. Records were found to be complete for the recertification period. Warning signs were observed during the site inspection of the 2023 Recertification Audit and found posted in areas where cyanide may be present and outside doors of each exposure area. The signs were readily visible and in good condition. Signage was observed at ADR1, ADR2, offloading areas, and the PSES plant. Signage stated “Danger Cyanide” and “Notice: No Smoking, No Eating, No Drinking Beyond This Point”. The cyanide offloading areas also have additional signage that states “Stop, Personal Protective Equipment Required Beyond This Point” and “Chemical Gear Required”. CC&V has designated smoking areas for employees around the process plants that are away from cyanide facilities. Employees who access the VLFs as part of their assigned responsibilities receive initial and refresher cyanide training. The Power Point presentations reviewed during the trainings include where cyanide is present and the prohibition of smoking, eating, and drinking around cyanide solutions.

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

	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 (SDS) in the Master Commodities Agreement between Cyanco and CC&V for the sodium cyanide delivered to site was reviewed and indicates the solution is dyed. CC&V has located safety showers, low pressure eye wash stations, and ABC fire extinguishers at strategic locations through ADR1, ADR2, and PSES plants where a potential for cyanide exposure exists. Operators look at fire extinguishers and check eye wash stations and safety showers as part of the workplace inspections at the beginning of each shift and document the inspections on the Pre-Operational Workplace Examination forms. An inspection is conducted monthly on the fire extinguishers, hose reels, eye wash stations, and showers in the process areas. Auditors reviewed a sampling of the Pre-Operational Workplace Examination and Monthly Emergency FE Inspections and found them to be complete. During the site inspection, fire extinguishers were observed to have inspection tags and were suitably charged and a sampling of eye wash stations were tested and found to be operational. Portable eye wash stations are available for emergency situations or specific tasks as needed. CC&V has identified tanks and pipes that contain cyanide to alert workers of their contents. All storage tanks containing cyanide were labeled as “Sodium Cyanide”. All piping containing reagent-grade cyanide and process solutions were observed for signage, labelling, and directional labels. Labeling on pipes either said “cyanide”, “rich”, or “spent”. The audit team found the labeling acceptable. SOPs are stored online in a SharePoint site and are accessible to all employees. SDSs are stored in a system called SDS Online. Employees are trained to review SDS’s prior to using a chemical. All SDSs and SOPs are in English, the language of the workforce. During the site inspection, auditors observed a job aid on how to access SDSs. Based on interviews and demonstrations during the site inspection, operators were able to access the SDSs from computer terminals in the control rooms. CC&V follows the Newmont Corporation Health, Safety, and Security (HS&S) and Sustainability and External Relations (S&ER) Event Reporting and Investigation Procedure for all incidents. The procedure includes investigation timelines and an event reporting process. No cyanide spills or exposure incidents occurred during the three-year recertification period. CC&V provided examples of other investigations for the auditors to review to confirm conformance to the procedure. Incidents, investigations, and corrective actions are tracked in Enablon.

Standard of Practice 6.3: *Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.*

FINDING:	BASIS FOR FINDING:
The operation is in full compliance with Standard of Practice 6.3.	CC&V is in Full Compliance with Standard of Practice 6.3 which requires that the site develop and implement emergency response plans and procedures to respond to worker exposure to cyanide. CC&V has first aid kits, MRT bags that include oxygen bottles and a resuscitator, and cyanide antidote kits (Cyanokits) available in or near cyanide-related areas. Portable oxygen bottles are available at ADR1, ADR2, and PSES Plant control rooms. Everyone in New Hire Training gets trained on how to use the oxygen bottles. Cyanokits are located in the ADR1, ADR2, and PSES Plant control rooms, Iron Clad security office, and in the site rescue truck. The availability of the first aid kits, MRT bags, and Cyanokits and observation of the antidote expiration dates were confirmed during the audit.

Standard of Practice 6.3: *Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.*	
	CC&V inspects the Cyanokits, first aid kits, MRT bags, oxygen bottles, and emergency response vehicles monthly. The Mine Rescue Specialist completes a full audit on the bags every 3 months. The Mine Rescue Specialist completes a monthly inspection using the Cyanokit Inspection form. The inspection requires confirmation that the Cyanokit is complete and not expired and the saline bag is present. During the site inspection, the Cyanokits were found to be current. The auditors reviewed a sample of inspection records and found them to be complete. The CC&V medical director indicated the Cyanokits are stored at an appropriate temperature as directed by the manufacturer. CC&V has developed a site-specific Emergency Response Plan that outlines potential site emergencies. The site Emergency Response Plan and the Cyanide Code Procedures provide specific response actions for cyanide exposures. In addition, employees receive Annual Refresher Training (ART) and New Hire Training that includes how to respond to a cyanide exposure. New Hire Training and ART include a video from Cyanco that reviews the signs of exposure and typical response actions. Employees are trained on the use of the oxygen bottles and Cyanokits. The auditors reviewed the training presentations and training records. During the site inspection, auditors interviewed process operators who responded with the correct emergency response actions. CC&V maintains its own onsite capabilities to provide first aid and medical assistance to workers who may be exposed to cyanide. All employees are trained in basic first aid; however, the MRT members are the primary responders during emergency situations. The MRT can provide cyanide decontamination and first aid. Three members of the MRT are Emergency Medical Technicians (EMTs) and are certified to administer the Cyanokits intravenously. Local paramedics (Southwest Teller County) are trained on cyanide exposures and can respond quickly. The CC&V MRT is trained how to assemble the Cyanokits in case the local paramedics need to administer the antidote intravenously. CC&V has agreements with local medical facilities and can utilize the local ambulance service to transport workers who may be exposed to cyanide. Local paramedics can be on site within 10 to 12 minutes and can transport workers who may be exposed to cyanide to offsite medical facilities. CC&V has an agreement for helicopter transport. The Emergency Response Plan provides guidance on how to direct a helicopter landing if needed. Cripple Creek Fire Department is available for support in the event a helicopter is needed. The flight to the Colorado Springs Hospital is estimated to be 12 minutes. When a mayday is called, security personnel call for local Emergency Medical Services if outside services are needed. CC&V has agreements with local paramedics and medical providers. Based on discussions with CC&V's Mine Rescue Specialist, CC&V is in regular contact with Teller County Emergency Medical Services and are confident that the paramedics and medical facilities would be able to appropriately respond to and treat a cyanide exposure.

4.7 Principle 7 – Emergency Response

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

Standard of Practice 7.1: *Prepare detailed emergency response plans for potential cyanide releases.*	
FINDING: The operation is in full compliance with Standard of Practice 7.1.	BASIS FOR FINDING: CC&V is in Full Compliance with Standard of Practice 7.1 which requires that the site prepare detailed emergency response plans for potential cyanide releases. CC&V has developed a site-specific Emergency Response Plan that outlines potential site emergencies. The site Emergency Response Plan and Procedure 2 in the Cyanide Code Procedures provide response procedures for cyanide exposures and accidental releases. The Emergency Response Plan and Cyanide Code Procedures were found to be sufficiently detailed with specific response actions included. The need to evacuate personnel from an incident area is included in the response procedures. The Emergency Response Plan has procedures for use of first aid and cyanide antidote during a cyanide exposure incident. The procedures describe symptoms of exposure, where to find the first aid and cyanide antidote kits, responsibilities of the MRT team, and protocol for offsite responders. CC&V's Environmental Event Response SOP outlines additional spill response actions. CC&V's Emergency Response Plan has a section dedicated to liquid sodium cyanide. The Plan covers the following scenarios related to liquid sodium cyanide emergencies: catastrophic release of hydrogen cyanide, transportation accidents, power outages, runoff from heap leach pads, tanks, pipelines, and offloading leaks/spills, uncontrolled seepage, fire/explosions, and exposure to cyanide. The auditors confirmed through interviews and a review of the emergency response planning information that the action steps in the plans are sufficiently detailed and are appropriate for the operation. A travel route for transporting liquid cyanide in a delivery truck to the ADR1 and ADR2 offloading areas has been evaluated and established. TransWood transports the sodium cyanide from Cheyenne, Wyoming to CC&V's offloading areas. Cyanco and TransWood take primary responsibility for any transportation-related emergencies resulting in a cyanide release up to the point of offloading at CC&V. CC&V will support in the event an emergency happens in the close vicinity of the mine.

Standard of Practice 7.2: *Involve site personnel and stakeholders in the planning process.*	
FINDING: The operation is in full compliance with Standard of Practice 7.2.	BASIS FOR FINDING: CC&V is in Full Compliance with Standard of Practice 7.2, which requires the involvement of site personnel and stakeholders in the planning process. CC&V regularly engages with its workforce and external stakeholders on cyanide emergency response planning. The Mine Rescue Specialist reviews the Emergency Response Plan with the MRT team regularly, with cyanide being a focus at least annually. MRT team members can provide input to the procedures at any time. Drills are

Standard of Practice 7.2: *Involve site personnel and stakeholders in the planning process.*	
	conducted regularly with local responders and the site MRT. Debriefs are completed after each drill that can include modifications to the Emergency Response Plan as needed. The Mine Rescue Specialist is active with the Local Emergency Planning Committee (LEPC) and engages with local fire department, paramedics, hospital, and the Teller County Medical Director. CC&V provides the Emergency Response Plan to those stakeholders (internally and externally) that would respond in an emergency. The Plan outlines responsibilities in the event of an emergency. CC&V has communicated with the LEPC, Teller County Dispatch, and the Office of Emergency Management about the Emergency Response Plan. The Emergency Response Plan is kept up to date and reviewed annually at a minimum. The auditors viewed several versions of the Emergency Response Plan to confirm it is reviewed and updated frequently. CC&V's Emergency Response Plan identifies external entities in which mutual aid agreements are in place. Two agreements are in place with Teller County and local hospitals to provide assistance during a cyanide exposure incident. The hospital annually acknowledges that they have the cyanide antidote kits and capabilities to respond to a cyanide-related incident.

Standard of Practice 7.3: *Designate appropriate personnel and commit necessary equipment and resources for emergency response.*	
FINDING: The operation is in full compliance with Standard of Practice 7.3.	BASIS FOR FINDING: CC&V is in full compliance with Standard of Practice 7.3 which requires that the site designate appropriate personnel and commit necessary equipment and resources for emergency response. CC&V's Emergency Response Plan outlines roles and responsibilities in Section 4. The roles and responsibilities include specific responsibilities for the MRT Coordinator, MRT Captain, the MRT members, General Manager, Managers/Supervisors, Health and Safety Manager, and Security. CC&V maintains a current list of MRT members. The training each MRT member has completed is identified in the MRT tracker. The Emergency Response Plan lists the 24-hour contact information for both internal and external members of the response team. The phone numbers include a S&ER and Health & Safety On-Call number. Sections 5.2 and 5.3 outline a communications plan and call out process in the event of an emergency. Section 5.4 of the Emergency Response Plan details the emergency response equipment and locations. The MRT maintains a list of all emergency response equipment as well. The Mine Rescue Specialist, or designee, inspects the emergency response equipment monthly. Completed inspection forms were reviewed as a part of the 2023 Recertification Audit. Local paramedics and hospital personnel are trained in the use of cyanide antidotes and are aware of their responsibilities in the event of a cyanide exposure. CC&V provides the local emergency providers with a copy of the site Emergency Response Plan.

Standard of Practice 7.4: *Develop procedures for internal and external emergency notification and reporting.*	
FINDING: The operation is in full compliance with Standard of Practice 7.4.	BASIS FOR FINDING: CC&V is in Full Compliance with Standard of Practice 7.4 which requires that the site develop procedures for internal and external emergency notification and reporting.

Standard of Practice 7.4: *Develop procedures for internal and external emergency notification and reporting.*	
	CC&V's Emergency Response Plan has procedures for communication, call out processes, and notification tiers. The Plan includes 24-hour contact information and up to date phone numbers of internal and external responders and management. The Environmental Event Response Standard Operating Procedure has procedures and up to date contact information for regulatory agencies. Newmont's Rapid Response Framework identifies a spokesperson within the CC&V S&ER team that is responsible for speaking with the community and media as needed. All communication with affected communities and media is to come from the CC&V S&ER team. The Emergency Response Plan has a procedure to initiate the Rapid Response Framework. CC&V follows the Newmont Corporation HS&S and S&ER Event Reporting & Investigation Procedure. Appendix 4 – Cyanide Code "Significant" Cyanide Incidents requires sites to notify ICMI within 24 hours of any significant cyanide incident. All cyanide-related events are reviewed by the Corporate S&ER team, along with the Cyanide Management Working Team as needed, to determine if notification to ICMI is required. Appendix 4 includes a table with triggers and guidance on cyanide events. No significant cyanide incidents occurred during the three-year recertification period.

Standard of Practice 7.5: *Incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.*	
FINDING: The operation is in full compliance with Standard of Practice 7.5.	BASIS FOR FINDING: CC&V is in Full Compliance with Standard of Practice 7.5 which requires that the site incorporate remediation measures and monitoring elements into response plans that account for the additional hazards of using cyanide treatment chemicals. CC&V has developed the Environmental Event Response SOP to provide guidance and outline roles and responsibilities for responding to, managing, and reporting an environmental event, including cyanide releases. In addition, Procedure 4 in the Cyanide Code Procedures provides additional details on responding to spills of cyanide solutions. For cyanide solution spills off containment, the spill response steps include preventing the spread of a spill using absorption socks and building berms; and recovering the spilled solution by pumping as much of cyanide solution as possible into containers. Contaminated soils are to be removed and placed on one of the VLFs. Spill clean-up equipment and any PPE used during the spill response is to be cleaned and fluids returned to the process. Environmental personnel will make a waste determination on any waste generated during a spill response and then dispose of the waste in accordance with state regulations. The Process Solution / Cyanide Sampling section within Appendix B in the Environmental Event Response SOP requires that process solution spills containing cyanide will be cleaned up to a concentration of 0.2 ppm WAD cyanide or less. This section specifies how samples are to be collected from a grid 'square' within the spill area, the weight of the sample, which is dependent on the size of the material in the spill area, and how to handle the samples. Samples are to be sent offsite for analysis.

Standard of Practice 7.6: *Periodically evaluate response procedures and capabilities and revise them as needed.*	
FINDING: The operation is in full compliance with Standard of Practice 7.6.	BASIS FOR FINDING: CC&V is in Full Compliance with Standard of Practice 7.6, which requires that the site periodically evaluate response procedures and capabilities and revise them as needed. The Emergency Response Plan is reviewed at least annually, or as new changes, drills, or incidents occur. The most recent update is April 2023 and the previous update was in 2022. The auditor also reviewed the 2021 version of the Emergency Response Plan. All contact information in the plan is kept up to date. Section 5.25 of the Emergency Response Plan includes procedures for updating and revising the plan and requires an update to the Plan as needed following the results of simulations. Based on interviews during the 2023 Recertification Audit, the Emergency Response Plan was updated as a result of an offsite cyanide related event. CC&V's Emergency Response Plan requires at least one unannounced drill per year. CC&V conducted multiple drills during the three-year recertification period with both internal and external providers. The auditors reviewed the cyanide emergency drills that were completed in 2021, 2022, and 2023. The drill scenario in 2021 was a plant evacuation in the ADR2 plant due to high HCN levels in multiple areas. The drill scenario in 2022 was an equipment failure during a cyanide solution offload. The 2022 drill included a TransWood truck being staged in a cyanide offload area. In 2023, a large-scale drill took place to test site MRT response and equipment, local emergency medical services (EMS) response readiness, and patient triage and recovery. The 2023 scenario was a cyanide release in the ADR plant with 3-4 victims. After each drill, a debrief took place. For the 2023 cyanide drill, all who were involved in the drill had to download a quick-response (QR) code to answer questions on what was effective or ineffective about the drill. Questions included hazardous materials (hazmat) response, general overview, and offsite capabilities. The auditor reviewed the drill records and found them to be complete.

4.8 Principle 8 – Training

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

Standard of Practice 8.1: *Train workers to understand the hazards associated with cyanide use.*	
FINDING: The operation is in full compliance with Standard of Practice 8.1.	BASIS FOR FINDING: CC&V is in Full Compliance with Standard of Practice 8.1 which requires that the site train workers to understand the hazards associated with cyanide use. All personnel who may encounter cyanide are trained in cyanide hazard recognition. New employees receive New Hire Training, which includes an introductory section on cyanide hazard recognition. Once assigned to an area, a person will then go through the Leach Pad, Maintenance, or Process Cyanide Power Point Presentations, which include training on cyanide exposure recognition, PPE, emergency response procedures, cyanide spillage, HCN gas, HCN gas monitors, cyanide truck unloading at ADR1 and ADR2, and additional cyanide-related operating procedures. Transwood cyanide delivery drivers receive site-specific cyanide training on their initial site visit and on an annual basis. They are trained on eight of the procedures contained in the Cyanide Code Procedures Task Training Outline. Visitors and contractors complete on-line training that includes a section on cyanide awareness. Contractors who will be working on site receive onboarding training, which includes additional cyanide training on cyanide exposure recognition, PPE, emergency response procedures, cyanide spillage, and HCN gas. The auditors reviewed the cyanide presentations and a representative sampling of training records for those working in CC&V's cyanide facilities to confirm that they received their initial and refresher cyanide training. The cyanide training presentations adequately address the type of cyanide present at CC&V's cyanide facilities. In-depth annual refresher training is completed for operations and maintenance personnel, including supervisors, who may come into contact with cyanide. This refresher training is completed in monthly safety meetings. The training presentations used for the initial training are used for the in-depth annual refresher training. A general refresher for cyanide awareness is completed during the annual Mine Safety and Health Administration (MSHA) refresher training for all personnel site-wide. The Process Operations Technical Trainer and the Process Maintenance Technical Trainer maintain electronic and hard copies of training records. In addition, electronic copies are also stored in Newmont's Learning Management System. The technical trainers provided a representative sampling of training records from the recertification period for the auditors to review.

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

FINDING:	BASIS FOR FINDING:
The operation is in full compliance with Standard of Practice 8.2.	CC&V is in Full Compliance with Standard of Practice 8.2 which requires that the site train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community, and the environment. ADR1, ADR2, PSES, and leach pad operators, Assay Lab/Met Lab Technicians, and maintenance personnel are trained on the procedures listed in the Cyanide Code Procedures Task Training Outline that are applicable to their position. Twenty-five procedures are included in the Task Training Outline. These procedures include cyanide truck unloading and production-related tasks. Operation personnel are also trained on additional cyanide-related SOPs that are applicable to their position. Operational personnel proceed through a line of progression and are trained on different tasks at each step in the progression. An experienced operator goes through procedures with an individual, the individual observes the experienced operator performing the tasks, the individual then completes the tasks with the experienced operator observing them. An individual must complete a performance test, which includes completing a task and providing the logic of why they are performing the steps within a task before they are allowed to perform the task alone. In addition, ADR1, ADR2, PSES, and leach pad operators must take and pass written tests. These tests contain a variety of questions on operational tasks, but also include cyanide-specific questions. A checklist has been developed for each position and an individual must pass the performance and written tests before being signed off on a task that is listed on the checklist. Once an experienced operator signs off on a task on the checklist, the individual can then perform the task alone. New maintenance personnel are paired with an experienced maintenance person and observe the experienced maintenance person performing tasks. New maintenance personnel must demonstrate that they can perform a task before they are signed off on a task. Maintenance supervisors and technical trainers can sign off on a task. Maintenance personnel do not work on cyanide equipment alone and are paired with a second maintenance person. When maintenance personnel are assigned to a specific job, they go over the hazards of that job in line-out meetings. CC&V maintenance personnel have developed work packages that include step-by-step instructions for the calibration and/or change out of cyanide equipment. Refresher training on cyanide management and cyanide-specific tasks is provided to ensure that employees continue to perform their jobs in a safe and environmentally protective manner. In-depth annual refresher training is completed for operations and maintenance personnel, including supervisors, who may come into contact with cyanide. This refresher training is completed in monthly safety meetings. In addition, supervisors or trainers periodically observe operations and maintenance personnel to ensure they are following procedures and not taking shortcuts. When they observe a deficiency, coaching is performed, including reviewing a procedure with the person. Training at CC&V is performed by experienced technical trainers. The technical trainers complete the initial training with new employees or employees that transfer to a new operational area. Experienced personnel that have been through the training and worked in the area for many years complete the hands-on training in the field.

Standard of Practice 8.2: *Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community, and the environment.*	
	Training records are retained throughout an individual's employment and document the training they have received. The records include the name(s) of the employee(s) who received the training, the name of the trainer, the topics covered in the training, the training completion date, and if the employee demonstrated an understanding of the training materials. CC&V maintains training records in hard copy and electronic forms for the term of employment. CC&V's technical trainers provided a random sample of training records for employees who work in CC&V's cyanide facilities.

Standard of Practice 8.3: *Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.*	
FINDING: The operation is in full compliance with Standard of Practice 8.3.	BASIS FOR FINDING: CC&V is in Full Compliance with Standard of Practice 8.3 which requires that the site train appropriate workers and personnel to respond to exposures and environmental releases of cyanide. CC&V trains personnel involved in cyanide unloading, production, and maintenance in the procedures to be followed if cyanide is released. These personnel are specifically trained on Procedure 3 (Emergency Response Procedure) and Procedure 4 (Cyanide Spillage) as well as the Environmental Event Response SOP. This training includes initial response to a cyanide spill and activating alarms. The primary response actions for these personnel are to activate an alarm and evacuate the areas. The MRT members will be called to respond to the incident. The auditor confirmed this through interviews with employees. Annual cyanide refresher training is given to all employees who may encounter cyanide in their job. The refresher training was available for review during the 2023 Recertification Audit and includes information regarding the required responses to cyanide exposures and releases. MRT members are trained on the Emergency Response Plan and emergency response equipment. The MRT is typically trained in January on the Emergency Response Plan. During the training, the MRT members review maps, roles and responsibilities, locations of equipment, and review response procedures. The MRT members participate in mock emergency cyanide drills and have regular training on topics such as HAZMAT, cardiopulmonary resuscitation, ropes and rigging, explosives, and firefighting. The Mine Rescue Specialist is active with the LEPC and engages with local fire department, paramedics, hospital, and the Teller County Medical Director. Two agreements are in place with Teller County EMS and local hospitals to provide assistance during a cyanide exposure incident. LEPC and Teller County EMS are given a presentation and copy of the Emergency Response Plan. The local emergency response teams have participated in mock cyanide emergency drills with CC&V. In 2023, a drill was conducted with the local paramedics and response team from Teller County. CC&V maintains training records in hard copy and electronic forms for the term of employment. In addition, they maintain records after employees leave CC&V in case the person is employed again by CC&V. The MRT Training Plan includes topics covered for training, a roster of MRT members, and signatures of those that went through training. CC&V maintains mock cyanide drills records that have signatures and rosters of who internally and externally participated.

4.9 Principle 9 – Dialogue and Disclosure

Engage in Public Consultation and Disclosure

Standard of Practice 9.1: *Promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns.*	
FINDING: The operation is in full compliance with Standard of Practice 9.1.	BASIS FOR FINDING: CC&V is in Full Compliance with Standard of Practice 9.1 which requires the site to promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns. CC&V works openly with stakeholders through a variety of mechanisms. Newmont has a robust stakeholder engagement program and process. CC&V has multiple agreements with the city of Cripple Creek and Teller County for ongoing engagements. CC&V conducts, at a minimum, 4 presentations a year to the city and holds 3 open houses annually. Eight hundred individuals in the community are signed up to be alerted about the community events. CC&V has an open-door policy where the community is encouraged to ask questions through community events, email the general external relations email, or come by the CC&V town office. CC&V documents all engagements and questions received from stakeholders in the Enablon system. CC&V has fact sheets that are given out on tours, open houses, and community meetings. One of the fact sheets is called “International Cyanide Code Management” and discusses the sites cyanide management practice. Newmont issues an annual Sustainability Report that covers cyanide management. In addition, Newmont’s website explains the life cycle of the mine.

Standard of Practice 9.2: *Make appropriate operational and environmental information regarding cyanide available to stakeholders.*	
FINDING: The operation is in full compliance with Standard of Practice 9.2.	BASIS FOR FINDING: CC&V is in Full Compliance with Standard of Practice 9.2 which requires that the site make appropriate operational and environmental information regarding cyanide available to stakeholders. CC&V has fact sheets that are handed out on tours, open houses, and community meetings. The fact sheets include general information about the mine and its operations, reclamation and closure, environmental management, the Cyanide Code, and social responsibility. Newmont issued a corporate news release “Newmont’s Approach to Responsible Cyanide Management” to explain Newmont’s overall approach to managing cyanide responsibly. CC&V is required to report actual or potential cyanide releases or exposures as part of their regulatory requirements. In December 2020, CC&V reported a process solution spill that occurred at the High Grade Mill facility to the Colorado Department of Natural Resources. All information reported is made available to the public by the associated regulatory agency. Newmont’s Sustainability Report details cyanide releases at each operation, including any that occurred at CC&V. Newmont has a program called the ‘Path to Zero Cyanide Spills’ Program. The annual Sustainability Report describes progress on this program. In the 2022 Sustainability Report Newmont indicated for all their mine sites, no cyanide spill resulted in the solution leaving the property and no threat to any communities or wildlife occurred.

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