NEWMONT CERRO NEGRO

MINING OPERATION
SUMMARY AUDIT REPORT

FOR THE
INTERNATIONAL CYANIDE MANAGEMENT CODE

SEPTEMBER 2022

BP Cyanide Auditors

Parque Federico Blume 142, Miraflores, Lima, Perú
Tel +51.947.259.440 | Email bpizzorni@cyanideauditor.com | Web CYANIDEAUDITORS.COM

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Operation General Information

Name of Mine:	Cerro Negro
Name of Mine Owner:	Newmont Corporation
Name of Mine Operator:	Oro Plata S.A
Name of Responsible Manager:	Daniel Cabrera - Plant Manager
Address:	Av. San Martin 1207-Z9040, Perito Moreno
State/Province/Country:	Santa Cruz, Argentina
Telephone/E-Mail:	Tel: (54 11) 4323-7000 | Daniel.Cabrera@Newmont.com

Operation Location Detail and Description

Cerro Negro Mine (Cerro Negro) is located approximately 60 kilometers southeast of Perito Moreno town in the province of Santa Cruz, Argentina. Cerro Negro has no formal settlements within its boundaries and the closest towns are Perito Moreno (population 4,200), located approximately 75 kilometers away, and Las Heras (population 12,000), which is located 107 kilometers to the northeast and can provide basic services. The nearest large town is Comodoro Rivadavia, located about 240 kilometers from the mine site.

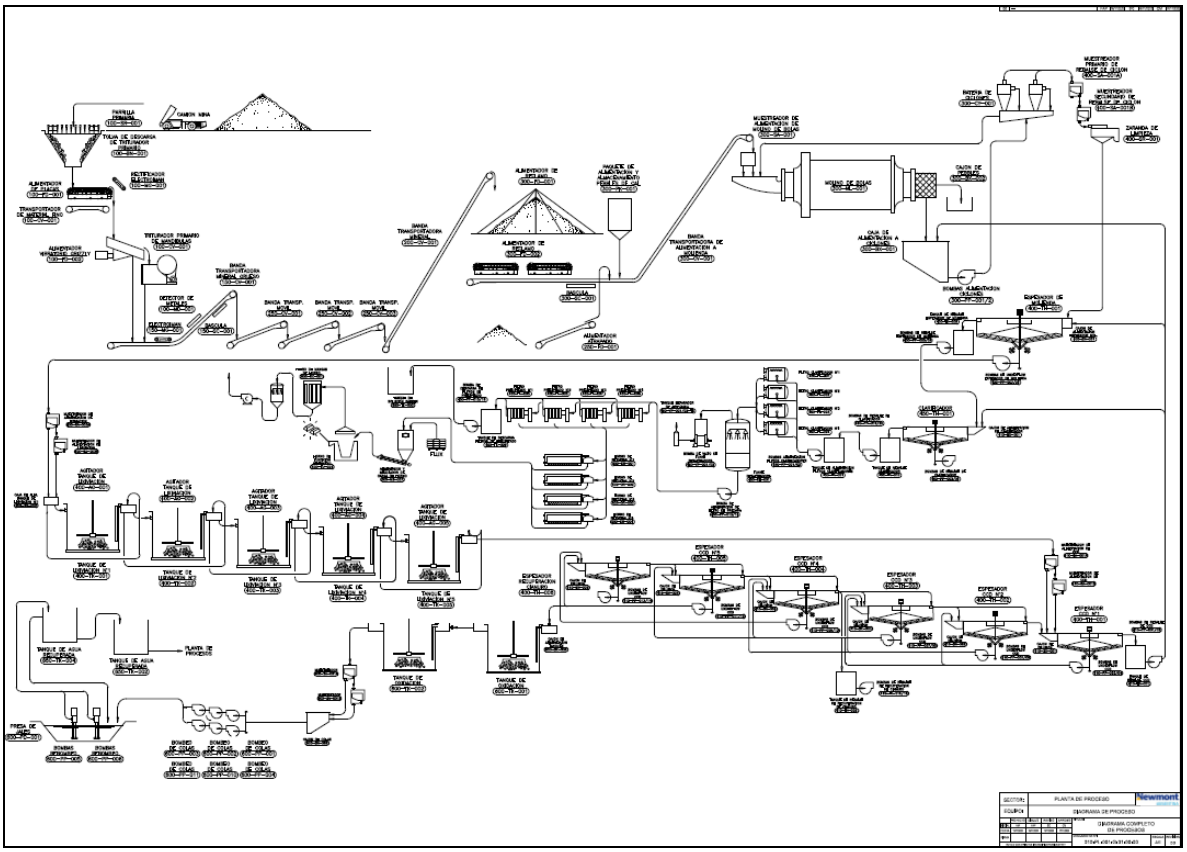
Cyanide was first received at Cerro Negro on March 3, 2014 and the first dore was poured July 25, 2014. Cerro Negro began commercial production on January 1, 2015 and became an International Cyanide Management Code (ICMC) Signatory mine on June 11, 2015. The International Cyanide Management Institute (ICMI) initially certified Cerro Negro on November 16, 2016.

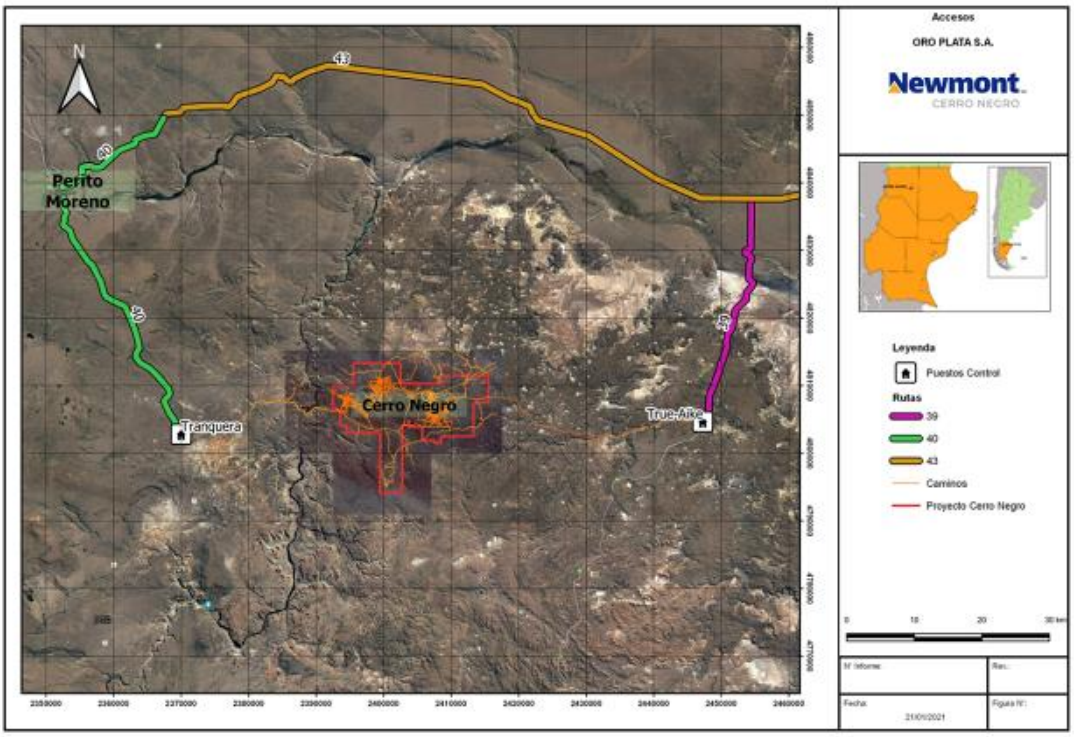
The project currently consists of the underground mines Eureka, Mariana Central, Mariana Norte, Emilia and San Marcos, the ore processing facilities and miscellaneous infrastructure and support facilities. Tonnage capacity is 4,000 tonnes per day. Ore is extracted and then transported in haul trucks to the crushing area at the process plant. The mine's stockpile of ore is maintained on a pad near the crusher.

The process plant consists of conventional metallurgical technology suitable for the style of ore mineralization. The plant and associated service facilities process the run-of-mine ore delivered to the primary crusher. The process encompasses crushing and grinding of the run-of-mine ore, agitated leaching, counter-current decantation, solution clarification, the Merrill-Crowe process (de-aeration and zinc precipitation) and smelting to produce gold/silver bars that are shipped to a

refinery for further processing. The counter-current decantation tailings are washed to recover cyanide prior to being detoxified by the INCO process (SO2 and air) and pumped to the lined tailings storage facility. The Tailings Facility (TSF) is located 1.5 km east of the Process Plant. The tailings basin is approximately 50 hectares. There are no permanent residences, structures or sensitive cultural or environmental sites identified downstream of the TSF.

The Cerro Negro process plant is displayed in a schematic below. The operations in this schematic were reviewed during the certification auditing process.





Tailings storage facility

Auditor's Finding

This operation is

✔ in full compliance

☐ in substantial compliance

☐ not in compliance

with the International Cyanide Management Code.

Compliance Statement

This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle.

Auditor Information

Audit Company:	BP Cyanide Auditors S.A.C.
Lead and Technical Auditor:	Bruno Pizzorni | bpizzorni@cyanideauditor.com
Date(s) of Audit:	August 30 to September 7, 2022

Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, as established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Auditors.

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

Principles and Standards of Practice

Principle 1 | PRODUCTION AND PURCHASE

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

Standard of Practice 1.1

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

The operation is	✔in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro acquires cyanide from manufacturers certified in the Cyanide Code. Orica International Pty Ltd. (Orica) an ICMI certified sodium cyanide producer, supplied cyanide until December 31, 2020. Now Draslovka Mining Solutions (Draslovka), former Chemours, supplies sodium cyanide to Cerro Negro by mean of its ICMI certified production facility Draslovka Memphis Plant. The auditor reviewed an agreement between Newmont an Draslovka valid between years 2021 to 2025, to purchase solid sodium cyanide for Cerro Negro mine. The agreement requires the facility has to be certified as following the Code.

The auditor reviewed purchase orders, commercial invoices and goods of receipt for the recertification period for the recertification period. The contracts, shipping documents, reception and purchasing records were available and reviewed. The Warehouse Manager was interviewed.

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 processfrom the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training and emergency response.

The operation is
- ✔ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 2.1

Summarize the basis for this Finding/Deficiencies Identified:

The auditor reviewed the chain of custody records to identify each transporter, supply chain, and supply chain component that participate in transporting cyanide from production facility Draslovka Memphis Plant to the mine site, confirming that each of these parties is certified or is part of a certified supply chain.

The contract, purchase orders and shipping records for this recertification period were reviewed. Draslovka is the current cyanide supplier to the mine which is produced at the Draslovka´ s Memphis plant and is then transported to Puerto Deseado in Argentine, by means of the ICMI certified Global Ocean Supply Chain, and the transported by truck to the mine with Víctor Masson Transportes Cruz del Sur S.A., trucking company, also an ICMI certified company.

The chain of custody of Draslovka' s sodium cyanide from the Memphis plant to the Cerro Negro mine in Argentina is as follows:

Draslovka fills Ecopaks® and/or boxes with sodium cyanide at its Memphis, Tennessee plant. These Ecopaks® and/or boxes are accommodated in 20-foot sea containers, which are closed and sealed. This operation is included in the certification audit of the cyanide code of the Memphis plant. Draslovka is a signatory to the code and its certification can be seen on the page within the link: Draslovka Memphis Plant. https://cyanidecode.org/sig-directory-type/draslovka-mining-solutions/

Because the Draslovka company acquired the Chemours Mining Solutions company on December 1, 2021, some certification audit reports still remain with the name of the previous company but within the Draslovka page. The Intermodal Cartage Company picks up the containers loaded at the Memphis plant and transports them to the railroad terminal. Intermodal Cartage Company is

listed and certified as one of Draslovka's transportation operations. The report is available on its website.
https://cyanidecode.org/wp-content/uploads/2021/06/DraslovkaIMCGSAR2022.pdf

The railway company CSX Railway takes custody of the product at the railway terminal, accommodates it in its railway equipment and transports it to the port, where custody is transferred to the shipping company. CSX Railway is a component of Draslovka's US and Canada Supply Chain and was given due diligence by an approved auditor and is in full compliance. This audit is part of "Draslovka' s Signatory Supply Chain" and its report is on the cyanide code page in the segment "Draslovka US and Canada's Rail & Barge Supply Chain".
https://cyanidecode.org/wp-content/uploads/2021/06/DraslovkaUSCanadaSupplyChainSAR2022.pdf

The railway company CSX Railway is contracted directly by the shipping companies, which were reviewed in the following due diligence:
https://cyanidecode.org/wp-content/uploads/2021/06/DraslovkaOceanSupplyChainSAR2022.pdf

The shipping companies: MSC, Sealand, Maersk, Hamburg Sud, Hapag Lloyd and Seaboard, upload the containers to their transoceanic vessels to transport them to the ports of Chile and Argentina. Shipping companies have been audited with a due diligence audit by an approved auditor, being in full compliance with the cyanide code. This audit is part of the "Draslovka Signatory Supply Chain" and its report is on the code page in the segment "Draslovka' s Global Ocean Supply chain."
https://cyanidecode.org/wp-content/uploads/2021/06/DraslovkaOceanSupplyChainSAR2022.pdf

Transportes Cruz del Sur is a transport company in Argentina, which is contracted by Draslovka to pick up the containers at the port and transport them to the mine. Transportes Cruz del Sur was audited by an auditor approved by the cyanide code and is in full compliance with it. Transportes Cruz del Sur is a signatory of the code and the audit report can be seen on its page.
https://cyanidecode.org/wp-content/uploads/2021/04/VictorMassonSAR2020.pdf

This verifies that the chain of custody of sodium cyanide from its manufacture at the Memphis plant to Mina Cerro Negro in Argentina is in full compliance with the cyanide code.

Cyanide transporters demonstrate that they protect communities and the environment during cyanide transport through Cyanide Code certification. The auditor compared the purchase and transport agreement between Draslovka and Newmont, also a Draslovka letter describing the supply chain actors participating between the production plant to the mine site, confirming that the cyanide was transported by certified transporters listed on the Cyanide Code website, finding full compliance with Standard of Practice 2.1.

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.

The operation is
- ✔ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 3.1

Summarize the basis for this Finding/Deficiencies Identified:

The unloading, mixing and storage facilities for reagent-strength cyanide have been professionally designed and constructed. As described in the initial certification report from 2016, the design and construction drawings were reviewed and provided adequate detail to demonstrate that the unloading, storage and mixing facilities at Cerro Negro were designed and constructed in accordance with sound and accepted engineering practices for these types of facilities. There have been no modifications to the cyanide mixing and storage tanks at Cerro Negro since the initial certification audit.

Cerro Negro has design specifications and as-built drawings stamped by a certified professional engineer. Has quality assurance and quality control (QA/QC) documentation for the cyanide storage warehouse. The warehouse is a steel-framed building with corrugated metal panels, a sealed concrete floor and stem walls. The roof is constructed with steel beams covered with corrugated panels. The warehouse is weather resistant with no evidence of water leakage in the interior of the building. Passive roof type fans ventilate the building. The warehouse has one access ramp. The building has bay doors that can be opened for loading and unloading. Otherwise these doors are closed and locked. Warehouse personnel move the solid cyanide from the storage buildings on an as-needed basis to the cyanide mixing area at the plant.

The auditors verified that the site has retained the QA/QC and design drawings of the warehouse, offload area and cyanide solution preparation area.

The reagent-strength cyanide unloading, storage and mixing facilities are located away from offices and shops where workers congregate and fenced with locked gates. These facilities are away from communities and from surface water bodies - surface water does not exist around the mine because of the arid climate. the closest town is Perito Moreno located approximately 75

kilometers away from the mine site. Cerro Negro is located in an area approximately 70 kilometers upstream from the nearest surface water body (Rio Deseado) and ranch. The operation has portable and fixed hydrogen cyanide (HCN) gas monitors equipped with visual and audible alarms, secondary containment and specific emergency procedures for notification, evacuation, response and remediation, as appropriate for the situation. Access to the warehouse during offloads and moving boxes is restricted. The process plant where the cyanide mix occurs is restricted.

Cerro Negro does not receive liquid cyanide from a tanker truck or isotainer system. However, the entire cyanide offload area at the warehouse is constructed of reinforced concrete slab-on-grade (i.e., pad, curbs, parapets, footings and tank foundations), which provides a competent barrier to seepage. The concrete area was in good condition at the time of this onsite verification audit.

Cyanide storage tanks are equipped with functioning overfill protection. The process plant has level sensors installed on the cyanide mixing and distribution tanks at the preparation area. These levels are continuously monitored in the plant control room via the Distributed Control System (DCS). The sensor instrumentation is equipped with an audible/visual alarm system. The sensors connected to the DCS trigger the alarm at 90%. The mixing tank must be at 70% full or less before receiving more cyanide. The method to prevent the overfilling of cyanide mixing and distribution has not changed since the initial audit, where they were found in compliance with the Code.

The operations has developed and implemented procedures for routinely inspecting, maintaining and testing overfill protection equipment and instrumentation to ensure it is functioning properly. The auditor reviewed maintenance records of the sensors with the maintenance manager and verified that maintenance of the sensors is being conducted on an appropriate basis. Also observed screen shots in the control room that indicated the level controls were functioning on these tanks, confirming this equipment is in place and functional through inspection of the operation and review of the inspection, testing and maintenance records.

Cyanide storage and mixing tanks have been installed with a concrete impermeable barrier between the tank bottom and the ground that will prevent seepage to the subsurface environment. There have been no modifications to the cyanide mixing and storage tanks at Cerro Negro since the previous certification audits. The 2016 audit reports for the initial certification stated that the process tanks, including mixing and storage tanks, are secured to solid, reinforced concrete foundations. The containment floor and tank foundations are monolithic and the floor is thickened beneath the foundation plinths. This foundation and floor system serves to prevent any seepage from the tank bottoms from entering the ground. The auditor observed that all of these concrete foundations were in good condition.

Secondary containments for cyanide storage and mixing tanks are constructed with concrete, providing a competent barrier to leakage. There have been no modifications to the cyanide mixing and distribution tanks since the initial certification audit. During the site walk through the

auditor confirmed by visual inspection that containments were free of cracks or any breeches that could compromise their ability to effectively contain releases.

The 2016 audit reports for the initial certification stated that in the process plant the entire process area is contained within a reinforced concrete pad surrounded by curbs, parapets and stem walls, providing a competent barrier to seepage. The concrete floor is sloped to drain to concrete trench drains, where any spills will be pumped to the grinding thickener tank.

At Cerro Negro cyanide is stored with the following measures:

a) Solid cyanide is stored in a roofed enclosed building to prevent contact with precipitation and on concrete pad to minimize the potential for contact with rainwater and snow melt. No water systems are present in cyanide storage areas. A safety shower and low pressure eye wash station is located outside of the cyanide warehouse.

b) The cyanide enclosed storage in the warehouse filled with crates of solid sodium cyanide is ventilated in the event of hydrogen cyanide (HCN) gas generation for any reason. Cerro Negro stores solid cyanide wooden boxes inside a locked warehouse with sufficient capacity to store all the cyanide boxes inside. The warehouse is covered with a metal frame and corrugated metal roof. There is passive ventilation in the warehouse. There is one HCN monitor inside the warehouse and one outside the warehouse. The HCN readings of the monitor is digitally displayed on the outside of the warehouse so personnel can know the HCN concentrations prior to opening the doors. Prior to putting new boxes in or removing boxes for mixing, the warehouse doors are opened, allowed to ventilate for at least ten minutes and then the personnel take manual HCN readings to verify that the HCN concentrations are safe. The cyanide mixing and distribution tanks are stored in the reagent area of the mill with a venting system within the mixing and storage tanks. HCN gas monitoring detectors with alarms are provided at the cyanide mixing area.

c) For overall security purposes, both solid and liquid reagent-strength cyanide are stored to prevent access by unauthorized personnel. The cyanide warehouse is in a fenced and locked area; the reagent area with high strength cyanide solution is located within the boundary of the plant which is fenced and access is controlled. Valves related to storage of liquid cyanide are locked. Signs prohibiting unauthorized entry are posted. The mill building where the cyanide mix and distribution tanks are located is in a secure area where public access is prohibited.

d) Cerro Negro does not store any other chemicals, explosives, food, animal feed or tobacco products in the cyanide storage warehouses other than cyanide. No smoking, drinking or eating is allowed within the cyanide storage areas. The auditor observed that there were no other materials stored in the cyanide warehouse other than response supplies. The cyanide mix and distribution tanks are located within a separate concrete berm and sump area. By visual inspection, the auditor confirmed that the system would prevent mixing of other

reagents in the event of spills.

Standard of Practice 3.2

Operate unloading, storage and mixing facilities using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 3.2

Summarize the basis for this Finding/Deficiencies Identified:

1. With respect to empty cyanide containers, are procedures in place and implemented to:

   a) Prevent empty cyanide containers from being used for any purpose other than holding cyanide?
   b) Rinse empty cyanide drums, plastic bags and liners with water three times and add the rinse water to the cyanidation process or otherwise dispose of it in an environmentally sound manner?
   c) Crush empty cyanide drums prior to disposal in a landfill and burn or otherwise dispose of empty wooden crates in an environmentally sound manner?
   d) Clean any cyanide residue from the outside of cyanide containers that are returned to the vendor and securely close them for shipment, including the hose connections and couplings on tanker trucks and isotainers?

   Cerro Negro receives solid sodium cyanide briquettes with a primary packaging in a polypropylene super-sack filled to 1 ton. The super-sack is then placed in a polyethylene bag to protect the material from water and humidity; finally the packaged material is placed in a wooden box. Cerro Negro has written procedures for the management, rinsing and disposal of the super-sacks and wooden boxes. A cyanide mix was observed to verify that the operation is following its procedures for mixing and disposal of the cyanide boxes and super- sacks (bags).

   Procedures in place and implemented to:

   a) Procedure Preparation of Sodium Cyanide requires Cerro Negro to track each wooden box by its individual serial number and includes the use of “first in, first out” practice. The boxes are dismantled and the bags triple-rinsed after mixing and temporarily stored in a locked on-site facility. The boxes and bags are disposed of in an off-site certified landfill. Inspection of the chain of custody records for the individual boxes was completed.

b) Cerro Negro's procedure Cleaning of the Sodium Cyanide Bags requires triple rinsing of the bags. The rinse solution drains into the mixing tank. Cerro Negro inspects the boxes to verify that there are no residual briquettes.

c) The dismantled cyanide boxes and rinsed bags are disposed of in an off-site certified landfill.

d) Cerro Negro does not return any cyanide containers to the vendor.

The operation has developed and implemented plans and procedures to prevent exposures and releases during cyanide unloading and mixing activities such as:

a) The procedure Preparation of Cyanide outlines the requirements for inspection, observation and mixing of cyanide. This procedure includes instructions for the operation of critical valves related to the addition of caustic, raw water and connection with the storage tank and operation of valves and couplings during the mixing. The procedure Loading, Transport and Unloading of Sodium Cyanide Boxes to the Process Plant covers the responsibilities for the transport of the boxes by the Warehouse Department from the warehouse and the process plant. Cerro Negro conducts a safe work risk analysis before cyanide is moved from the warehouse to the process plant. The plant shift boss conducts a meeting with the mix operator and the two observers before a mix event and reviews the mix procedure.

b) The procedure Loading, Transport and Unloading of Sodium Cyanide Boxes to the Process Plant has specific instructions that address the safe transport from the warehouse to the mixing area and then offloading the boxes. The weather is checked before moving boxes from the warehouse. Cerro Negro will not move boxes during high winds (over 60 km/h), lightning storms, or heavy snow and rain. Various departments (i.e. medical) are notified that this activity will occur. The procedure includes having both the Warehouse and Security Departments present to observe and provide support in case of an emergency. Traffic is controlled around the unload area using traffic cones and the presence of Security Personnel.

c) Cerro Negro has a written procedure Receiving and Offloading of Sodium Cyanide in the warehouse that specifies a maximum stacking height of three boxes in the warehouse. In addition, the operation has posted signs limiting the stacking height to three boxes in the warehouse.

d) Procedure Preparation of Cyanide has written procedures that address the prompt clean-up of solid cyanide spills during mixing. Any liquid spills or leaks within the concrete containments are automatically pumped from the mixing area sump back into the process circuit. Operators are trained to hose down the spill areas immediately. Review of Cerro Negro's containments indicated excellent housekeeping practices.

e) Procedure Preparation of Cyanide requires personnel during mixing to wear Personnel Protection Equipment (PPE) including Tychem suits, full-face shield, dust respirator, hardhat, rubber boots, acrylic nitrile gloves and a personnel HCN monitor. The procedure requires that a minimum of three operators be present for the mixing. The operators are someone to open the boxes and super-sacks, a second person to prepare the cyanide solution, a third person to

operate the hoist. There is also an observer in a room in front the reagent area with telephone, radio and cyanide first aids kit. There are two cameras: one on the upper level (mixing) and one on the floor level that provide coverage of the mix activity to the control room. The auditor observed a pre-mix safety meeting and then a cyanide-mixing event during this recertification audit. The auditor observed that the Procedure Preparation of Cyanide was properly implemented. The auditor also reviewed the procedure and concluded that Cerro Negro has developed an appropriate checklist, defined the safe tasks, and appropriate observation to safely complete and document all mixing events.

f) Red colorant dye (carmoicine) comes inside the cyanide bags in a concentration that provides for clear visual identification. The auditors inspected the offload area, the mixing and holding tanks for evidence of spillage and there was no evidence during or after the mixing event of red-dyed cyanide solution.

Implementation of all these procedures was verified by observation and interviews with the personnel responsible for performing these tasks.

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 preventive maintenance procedures.

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 4.1

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro has written plans and procedures for operating its cyanide facilities in a manner which protects its workers and the environment. Since the Code defines Process Solution as any solution with a concentration of 0.5 mg/l Weak Acid Dissociable (WAD) cyanide or greater, the following are the cyanide facilities identified in the operation:

- Reagent-strength cyanide storage tanks and solid cyanide storage facilities;
- Secondary containments associated with cyanide storage and production facilities;
- Ball mill equipment, as cyanidation tailings reclaim water is used
- Counter-current decantation (CCD) area;
- Merrill-Crowe Plant;
- Pregnant solution tank;
- Barren solution tank;
- Clarifier and thickener tanks, and clarifier filters
- Oxidation plant;
- Tailings storage facility
- All pumps, piping and appurtenances connecting these facilities; and
- Surface water diversions that protect these facilities from run-on.

Procedures are grouped according to the following specific operating areas:

- Area 100 – 200 -250 Crushing
- Area 300 – Grinding
- Area 400-410 - Leaching and CCD
- Area 450 – Merrill-Crowe
- Area 600 - Oxidation and TSF

- Area 800- Reagents

Among the plans and procedures the auditor reviewed are:

- Cleaning 800-tk-002 cyanide distribution
- Inspection and cleaning of the cyanide solution system
- Washing sodium cyanide bags
- Sodium cyanide preparation
- Stopping cyanide dosing pumps
- Starting cyanide distribution pumps
- Bottle leaching test
- Safe Work Analysis rev08
- Confined spaces
- Incident Management
- Identification of hazards and risk assessment
- HCN poisoning
- Doctor's Office Care and Referral Rev.02
- Delivery and authorization of intervention of fixed equipment process plant
- Shower check and eye wash
- Decontamination of equipment containing solution with sodium cyanide operating procedure in the event of a water imbalance
- Tank surveillance against outages and loss of control
- HCN Gas Monitoring
- Safety considerations for preparation of concentrated cyanide solution placement and removal of PPEs for preparation of reagents
- Use of front skid steer loader
- Procedure document control and management
- Waste management
- Waste transport rv4

The auditor reviewed these procedures and interviewed plant operators, maintenance and environmental personnel and verified that Cerro Negro understands how to manage cyanide in a manner that prevents releases to the environment and exposures to workers and the community.

These procedures are adequate to provide measures to protect human health and the environment. The auditor reviewed the operation’s written operating plans and procedural documents confirming that they address the safe operation of all cyanide facilities. Implementation of the plans and procedures was confirmed through inspection of these activities and interviews with the personnel responsible for performing these activities, and review of available documentation.

Cerro Negro operational plans and procedures provide the link between its design and the necessary operational practices. The site's operating plans and procedures, reference the assumptions and parameters on which the design was based, as well as applicable regulatory requirements related to prevention of cyanide releases and exposures, to allow the operation keep track of why it is operating according to a specific plan.

The major parameters included in the tailings operating plans and procedures are, among others:

- The operating freeboard in the tailing's storage facility is 1 meter (m).
- the concentration of cyanide discharged to and allowed in the tailing's storage facility is below 50 ppm WAD (Weak Acid Dissociable) cyanide;

The auditor interviewed personnel responsible for the operation and maintenance of the facility. Personnel showed good awareness of program requirements.

The operation's management system address those aspects of the operation that are necessary for protection of workers, communities and the environment. Specific items addressed in operating plans or procedures include:

- water management procedures, such as how and when TSF solutions must be managed to retain the design storage capacity in this facility;
- inspection programs for cyanide facilities such as process tanks and pipelines, and tailings impoundments; and
- preventive maintenance programs for critical equipment.

Equipment, personnel, procedures, and records from the areas containing cyanide were the focus of this audit. An online database of procedures was available for review during the audit. Procedures address all aspects of the facility, including operational control, environmental, health and safety topics, preventive maintenance, water balance, and inspection processes for equipment, secondary containments, environmental media, and wildlife protection. Procedures were available for normal and upset or emergency operating conditions.

Procedures were reviewed and were found to be appropriate for the operation and fully implemented. The auditors reviewed inspection records for the time period of this recertification audit. The inspections are to verify that the water management procedures are managed to provide the required design freeboard in the tailing storage facility.

Inspection programs are implemented throughout the plant including the various cyanide facilities that include all offload areas, process tanks, pipelines, valves, pumps and secondary

containments, and tailing storage facility.

Cerro Negro has a preventive maintenance for critical equipment using the SAP (System Analysis Program). Preventive maintenance and calibration plans are generated automatically for the specific frequency of the equipment. Work orders generated from inspection forms are entered in the system, including assigned priority.

Cerro Negro has a formalized procedure Management of Change (MOC) for managing changes to the production processes or operating practices. The purpose of the procedure is to ensure that systematic processes are in place to evaluate any changes at the plant so that the risks of incurring negative impacts to people, environmental, property, or product quality are minimized. The procedure identifies changes to the facility or its operating practices that may increase the potential for cyanide releases and worker exposures before such changes are implemented so that they can be evaluated and addressed, as necessary.

The written procedure requires notification to environmental and safety personnel and sign offs by these departments, among others, before the change can be instituted is the best way to address this. Verification was through review of the procedure as well as completedforms that have been signed off by environmental and health and safety personnel.

For example, the auditor completed MOC procedures related to the installation of a new cyanide hopper at the reagent area, also for the new pumping system installation at the TSF, during this recertification period. Other MOC analysis performed was the modification made to the frequency of the dictation of Module 1 and 2 training. From a procedure it was passed to cyanide the Management Training Plan.

Cerro Negro has implemented contingency procedures for the process plant and tailings storage facility to respond to upsets in water balance, problems identified by monitoring and inspections, and to address temporary closure of the operation. Procedures include step-by-step measures for stopping and starting the plant facilities, events of a power outage, provide response measures for emergencies related to failures of cyanide equipment, and response plans to address upsets in the process water balance.}

Cerro Negro Mine Closure Plan and the Tailing Facility Manual provide measures to take for an unplanned closure and during temporary closure. These plans include the requirement to continue ongoing maintenance and inspection of the entire process plant, tailings facility, and emergency pond and to ensure that the integrity of all pipelines, trenches, diversion structures, berms and embankments are maintained. In a closure or upset water balance scenario, no additional tailings would be pumped to the tailing's facility.

Procedures reviewed with respect to management cyanide related contingencies are:

- Vigilance of tanks during loss of control or power outage
- Start-up of precipitation and clarification area
- Stoppage of precipitation and clarification area
- Start-up of CCD circuit
- Stoppage of CCD circuit
- Start-up of leaching area
- Stoppage of leaching area
- Intervention to spill of hazardous substances
- Monitoring of tank levels for cases of power outages and loss of control
- Water balance contingency plans
- TSF contingency plans

The control room operator and process plant operators demonstrated knowledge of the contingency shutdown procedures for safely ceasing operations in the processing plant in the event that there is a threat of process water release. The procedures for the plant and the tailings facility are adequate to respond to upsets in water balance, problems identified by inspections, and to address temporary closure of the operation.

Cerro Negro inspects the following at unloading, storage, mixing and process areas, as applicable:

a) Cerro Negro personnel perform weekly visual inspections of the process facilities and inspect tanks for signs of corrosion and leakage. Inspections include the preparation tanks, distribution, and all tanks containing cyanide in the process plant, for signs of corrosion and other potential issues. These inspections are documented on the checklist Cyanide Tanks, which records observations regarding cracks, perforations, corrosion, filtration, presence of fluids, dents, connections, man entry, operating level sensor, paint and signage. Inspections at the warehouse are before each delivery of cyanide and before moving cyanide from the warehouse to the plant. The auditor reviewed inspections for the recertification period and verified that inspections are being completed on an appropriate frequency.
b) Operations personnel perform monthly inspections of the concrete secondary containments at the process plant for their integrity, the presence of any fluids, to ensure that any drains are closed and locked, to prevent accidental releases to the environment.
c) Cerro Negro performs weekly inspections to the spill collection systems at the cyanide preparation, process area and trenches. All these areas have concrete containment with adequate slopes that allows any spill to drain into a sump where an automatic level detector will activate the pump to return the spill to the process. The inspections require verification that drains linking containment areas are open and free of obstructions. Operations personnel inspects for the secondary containments at the cyanide preparation

area and distribution tank for cracks and general condition of the concrete. The presence of fluids is included in the inspections. Cerro Negro does not have leach pads or process ponds. Cerro Negro operations department performs daily inspections of the tailing's facility. The environmental department conducts weekly and monthly visual inspections of the tailing's facility.

d) Cerro Negro performs weekly visual inspections of the process facilities and inspects pipelines, pumps and valves for signs of corrosion and leakage pipelines at the process plant and tailings pond. These inspections include pipes in the preparation area and process areas, as well as pregnant and barren solution pipelines. Area 300, Area 400 and Area 600 (only piping to the pumps) are inspected monthly; Area 400 from 400-TK- 001 to the thickener tank CCD1 every 8 months. The other Areas have an inspection frequency of 4 months.

   Cerro Negro performs preventive maintenance inspections on pumps on a weekly, monthly and quarterly basis. Weekly inspections include lubrication, external cleaning, and minor failures. Monthly inspections are similar to the weekly inspections but include an internal cleaning without opening pump. The quarterly inspection includes dismantling the pumps and checking internal workings. Additionally, personnel perform daily pump inspections for temperature, pressure, vibration and leaks. Operations inspect the pumps at the cyanide mix and distribution tanks before each cyanide mix. The night-shift process personnel inspects pumps and valves for salts at unions, leaks, presence of valve locks, pump noise, and pump temperature.

e) Cerro Negro operators perform daily inspections of water levels in the tailings pond and the surface water diversions upgradient from the tailing storage facility that prevents run-on into the tailing's facility. The auditors reviewed inspection records for the time period of this recertification audit and were verified that the inspections are being completed and recorded. Visual inspection of the tailings surface is daily. Bathymetric surveys are completed monthly using a drone.

The auditor conducted a field inspection during the site visit and verified the condition of tanks, secondary containments, pipelines, pumps, valves, tailings facility and slurry pipeline. These inspections also included cyanide unloading, mixing and storage facilities. The auditors reviewed inspection records conducted by Cerro Negro of the cyanide facilities and were found to be complete.

Facility inspections have been conducted frequently enough to identify potential problems before they present a risk of cyanide release or exposure. Cerro Negro maintains a program to inspect cyanide facilities that was found to be sufficient to assure that the operation is safe and functioning within design parameters. The auditor reviewed inspection records for this recertification audit and verified that inspections were done in a consistent manner and recorded.

Cerro Negro performs inspections at various frequencies at the cyanide storage warehouse, the process plant and the tailings facility and slurry delivery pipeline. The plant inspections include cyanide preparation area, fixed HCN monitors, pH of process solution, safety equipment and cyanide antidote kits. Emergency showers and eyewash stations are inspected and functionally tested at the start of every shift and prior to beginning a task that has the potential for cyanide exposure (examples: cyanide preparation and opening a pipeline for maintenance). In addition, Cerro Negro performs weekly inspections to the process tanks, emergency showers and eyewash stations, fire extinguishers, hydrants, and first aid equipment. The frequency of inspection of secondary concrete containments is monthly.

Cerro Negro inspects pumps weekly, monthly and quarterly. Tank level instrumentation is calibrated/maintained every 15 days and monthly at the mixing tank and the distribution tank. These inspections include evaluating the condition of tanks, valves, pumps and pipes, among others in the process plant. The Environmental Department conducts daily wildlife inspections at the tailing's facility. The auditors reviewed inspection records for the last 3 years of the cyanide facilities and verified that inspections are conducted on a consistent manner.

Inspections at Cerro Negro are documented as follows:

a) The facility inspections are documented on inspection forms, and include the date of the inspection, the name of the inspector, and any observed deficiencies. The nature and date of corrective actions are also documented along with the record of the inspection.
b) Operational inspections are documented on checklists. Corrective actions are documented in maintenance records and work orders in the SAP System. Cerro Negro uses SAP to document, track and close corrective actions identified during inspections. The auditors verified that corrective actions related to cyanide facilities were prioritized for prompt implementation. The auditorreviewed the operation's inspection records and maintenance records verifying that this information is recorded.

The operation has a preventive maintenance program for its cyanide facilities where a failure can result in a cyanide release or exposure. Cerro Negro has a documented preventive maintenance program to ensure that equipment and devices function as necessary for safe cyanide management. The preventive maintenance program is used to perform necessary maintenance and inspect the integrity of process equipment, piping and tanks, according to a maintenance program and every time is needed to keep equipment and installations properly working. In addition to the preventative maintenance program of the pumps, Cerro Negro has redundant pumps for the critical cyanide pumps.

As part of this program, plant operators perform daily inspections reporting any findings as

needed of equipment repair or maintenance, which are processed by the site's formal maintenance program, generating work orders and following it until closed. Works done to equipment is record in the SAP software database and it is available to see the equipment history.

Schedules for daily, weekly, monthly, quarterly, and annual maintenance activities for cyanide facilities are maintained electronically. Work orders are generated and trained maintenance personnel perform the required tasks. Completed work orders and calibration records were sampled for the recertification period and were found to be complete. The auditors reviewed the SAP program with the maintenance manager and tracked cyanide pumps as an example of how the SAP system works. Maintenance personnel, instrument technicians, and maintenance supervisors were interviewed during the audit. All personnel showed excellent awareness of cyanide safety topics and the need for proper maintenance of the equipment used in the operation.

Written procedures are used to ensure that any equipment that contains cyanide is properly decontaminated prior to performing maintenance and that maintenance personnel are wearing the necessary PPE.

Cerro Negro performs preventive maintenance on pumps, valves, flow meters, gauges, level sensors, pH meters, sump pumps, filters, and HCN sensors. Cerro Negro uses SAP software to generate weekly maintenance schedules. Workers are provided with relevant maintenance checklists (work orders). The mechanic completes the checklist form and returns it to the Maintenance Planner for input into the software system, which retains a history of the work performed. Equipment is categorized as general and critical. Critical equipment is higher priority for maintenance although not necessarily cyanide related.

The auditor inspected the cyanide facilities, review maintenance records and interview employees determining compliance with this provision.

The operation has emergency generators to power pumps and other equipment, as necessary to prevent unintentional releases and exposures in the event its primary source of power is interrupted. Cerro Negro has two Caterpillar diesel-powered generators 2,000 kW each, located at Area 700 in the process plant. The power required to operate the critical areas of the plant is approximately 3,600 kW. Cerro Negro has implemented the written procedure Launching Generators at a Power Outage for power outage scenarios. The procedure describes step by step the procedure for outages of external energy in order that generators at Area 700 are launched to feed all planned areas of the plant for these events.

In the event of a power outage, the crusher, ball mill and refinery will be stopped from operating and the electronic controllers on the cyanide feed lines from the day tank would

stop flow to the ball mill. Also, Cerro Negro has an uninterruptable power system (UPS) to the control room, main controller, and computer servers throughout the facility.

Cerro Negro has also implemented the written procedure Generators and Transformers Maintenance Procedure to establish the preconditions to launch the generators, and to ensure the leader of the maneuvers by the communication channel is a single person and whoever coordinates with other power plants to avoid accidents or damage to property.

The preventive maintenance program for the generators includes weekly maintenance and complete overhauls every three years by the Caterpillar dealer. Additionally, the generators are run for 15 minutes every other day. The auditor reviewed maintenance records verifying that the operation maintains and tests this equipment as necessary to ensure that it is functional if and when needed.

Standard of Practice 4.2

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

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 4.2

Summarize the basis for this Finding/Deficiencies Identified:

The mine has an ongoing program to determine if the standard rate of cyanide addition in an ore processing facility is sufficient, but no greater than that required, to optimize gold and silver recovery. The auditor confirmed the operation has implemented this program.
The procedure identifies anticipated changes in the characteristics of the ore fed to the mill and modifies the cyanide addition rate accordingly. The operation has implemented a manual program for sampling and analysis of tailings to determine residual cyanide levels and to allow for the adjustment of addition rates in real time as necessary to maintain optimal dosing.

Cerro Negro has the written procedure Leach Testing for metallurgical testing of mineral samples. Initial bottle roll tests were conducted in November 2014 for design using exploration samples from Eureka and Mariana mines. Cerro Negro adjusts the cyanide addition rates based on monthly composite samples and analysis from tank CCD 6 (last tailings tank prior to cyanide destruction) and completes diagnostic leach testing to determine the association between silver and gold not recovered. Cerro Negro updated the Leach Testing procedure in 2017 and conducts the testing in house. The auditor interviewed

the Cerro Negro's Laboratory Chief and reviewed monthly test results to verify that Cerro Negro is conducting the leach testing.

Standard of Practice 4.3

Implement a comprehensive water management program to protect against unintentional releases.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 4.3

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro has an adequate comprehensive and probabilistic water balance model (Goldsim) as a predictive tool that allows the mine to manage cyanide solutions in real time to account for foreseeable precipitation events. The auditor reviewed the water balance which considers the appropriate factors, and confirmed the site implements the necessary practices to maintain the balance on an ongoing basis.

The water balance model is comprehensive. The model consists of five zones divided by areas of operation, which are: Eureka, Mariana, Vein Zones, Process Plant and the Tailings Facility (TSF). It considers the plant production plan, water pumped from the TSF to the plant, freshwater additions from five production wells, process plant shutdowns, tailings deposition rates, effects of freezing and thawing, water pumped to the TSF from seepage collection wells, precipitation, evaporation, seepage rates and potential power outages, among others.

From the probabilistic perspective, the water balance model takes into account the uncertainty and variability inherent in the prediction of precipitation patterns, the frequency and distribution of precipitation events to be considered along with extremes and seasonal variations. The model uses meteorological data collected from the 3 on - site meteorological stations and compares that data to the regional data collected at the Rio Mayo 150 km away. Cerro Negro is located in the geographical domain of Extra Andean Patagonia, which is an arid climate, with average rainfall of about 213 mm / year and an average annual evaporation is about 640 mm / year.

The water balance model uses a daily time step with a spreadsheet tab for each month of the year. The model can be used for actual conditions as well as annual, seasonal, and daily extremes and power outages, potential for overtopping of the tailing's facility, such as use of forced lower evaporation and heavy precipitation. The model allows the superimposition of extreme events, such as the 100-year, 24-hour event, on any day in the average- and wet-

year scenarios.

Interviews were conducted with the three environmental personnel responsible for the water balance to confirm that the parameters used in the water balance modeling were being continually monitored and maintained as part of daily operations. They presented the Goldsim model and demonstrated their knowledge of the model and how it can be used a predictive tool.

Cerro Negro water balance considers the following in a reasonable manner:

a) The rates at which tailings are deposited into the tailings storage facility from the process plant is calculated from the production values (as solid material) and the solid content of the tailings. This rate can be varied in the model if needed.
b) The facility has considered the design storm duration and storm return interval that provides a sufficient degree of probability that overtopping of the ponds and tailings storage facility can be prevented during the operational life of the facility.
c) The quality of the on-site existing precipitation and evaporation data is representative of actual site conditions. Cerro Negro has 3 meteorological stations: one at the TSF, other at Bajo Negro 5 km away, and a third one 12 km from Mariana mining operation area. Actual on-site daily values are used in the model.
d) Run-on to the tailing's facility is not considered because all run-on is diverted. The model does account for diverted underdrain water because that water is pumped back to the tailing's facility.
e) Effects of freezing and thawing are considered and the model can account for this including a 24-hour delay factor for the thawing.
f) Evaporation at Cerro Negro is significant. The average daily evaporation rate is approximately 470 m3/day. The model also accounts for solution pumped from the seepage collection system back to the tailings facility. Losses to surface water are not considered because there are no discharges to surface water.
g) Cerro Negro's water balance includes the potential effects of equipment failure and power outages with the capacity of the tailings line to gravity drain to the emergency pond. Cerro Negro has back-up power generators.
h) Treatment capacity is not considered because there is no discharge to surface water.
i) The impact from the phreatic surface is not considered because the groundwater table is at least 2 – 3 meters below the liner

The auditor reviewed the water balance and design documents for the TSF. The minimum freeboard of 2 meters over the TSF design storage capacity is specified. The operation's inspection records were reviewed verifying that these facilities are operated with adequate freeboard and is being monitored in accordance with the procedures and tailings operating manual for the time period of this recertification audit.

The operating freeboard in the tailing's storage facility was changed during this certification period from a minimum of 2 meters to 1 meter (m). After the hydrological analysis of the year, Knight Piésold Argentina Consultores (KP) generated a memorandum where it is defined that the new free edge is 1 m. The report states the lagoon levels have been obtained from the total volumes calculated, assuming the surface of the final tailings for Phase 3. Tailings are considered to be 1 m below the level of the crown - crowning level is 784 meters above sea level (m.a.s.l.) and are considered an additional 0.20 m due to waves due to the wind.

According to the memorandum, rainfall for events with different return periods was obtained by Knight Piésold Tailings Facility Water Balance (2020). The PMP (maximum probable precipitation) was consulted in Stantec Dam Breach and Flood Inundations Study for Cerro Negro Mine (2019). It is noted that this report clarifies that a study was not conducted for the determination of the PMP and its value arises as 1.8 times the value of the precipitation of the event of 10,000 years of return period which was taken from Stantec Cerro Negro Tailings Impoundment Report (2019). It is noted that the precipitation for a return period of 10,000 years obtained by Stantec is 204 mm which is relatively less than that specified by Knight Piésold which is 236 mm.

The lagoon water volumes for each event were calculated as precipitation in mm, multiplied by the area of the TSF basin which has an estimated value of approximately 1.75 Km2. The volume of the event determined above plus the volume of operation, which has been considered 200,000 m3, gives the total volume of lagoon water in the dam for each of the different scenarios. The operational volume considered was provided by Cerro Negro.

Cerro Negro measures precipitation, compares the results to design assumptions and revises operating practices, as necessary. The site measures precipitation and compares the results to the design assumptions. The water balance model is updated annually with meteorological data collected from 3 on-site meteorological monitoring stations. The water balance projections are revised as necessary based on actual data.

Cerro Negro demonstrated the water balance model to the auditor. The model tracks the TSF levels on a daily basis, thereby allowing operating practices to be revised as necessary in real time.

The auditor reviewed the on-site meteorological monitoring data and determined the information to be complete. Cerro Negro maintains the information in an Excel spreadsheet that is then uploaded to Goldsim. An outside contractor periodically calibrates and maintains the meteorological instruments. Cerro Negro's environmental department conducts a monthly internal check of the instruments.

The operation measures precipitation at the site and routinely compare it to the design assumptions used to develop the water balance model. The operation also revises its operating practices when actual precipitation deviates from that assumed for the facility design, as the mine has only a history of 50 years precipitation records. The site measures precipitation and compares the results to the design assumptions. The water balance model is updated annually with meteorological data collected from 3 on-site meteorological monitoring stations. The water balance projections are revised as necessary based on actual data. The model tracks the projected pond levels on a daily basis, thereby allowing operating practices to be revised as necessary in real time.

The auditor reviewed the on-site meteorological monitoring data and determined the information to be complete. Cerro Negro maintains the information in an Excel spreadsheet that is then uploaded to Goldsim.

Standard of Practice 4.4

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

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 4.4

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro has no open waters with WAD cyanide concentrations exceeding 50 mg/l. The tailings impoundment supernatant pond is maintained well below the 50 mg/L WAD cyanide. Verification was through review of analytical water quality data of the tailing's solution prior to discharge into the tailing's facility and from the active spigot discharge. The Process Plant samples the tailings solution prior to discharge to the tailing's facility every two hours.

The auditors reviewed daily WAD CN from the spigot to the tailing's facility for the time period of this recertification audit. All samples were below 50 mg/l WAD CN. Cerro Negro has the procedure Oxidation Area Detention that states if the concentration exceeds 50 mg/l of WAD cyanide, the operations manager has the samples analyzed by the on-site laboratory to verify and then if necessary operations will make adjustments in the oxidation circuit.

A second measure to restrict wildlife access to the supernatant pond is a perimeter fence around the tailing's facility. Operations check the fencing daily. The environmental department checks the fencing weekly. Cerro Negro raised the height of the fence by another meter from the initial certification audit because of the height that the guanacos can jump.

The auditors reviewed completed inspection forms that included the fencing covering the audit recertification period and found them to be complete. No cyanide-related wildlife mortalities have occurred since the startup of Cerro Negro, including the time period of this recertification audit. The auditor interviewed personnel from the operations and the environmental departments and also verified that the fencing completely surrounds the tailing´s facility.

The mine showed analytical data demonstrating that the TSF supernatant solution is well below 50 mg/l WAD cyanide. The auditors reviewed analytical water quality data of the tailing's solution prior to discharge into the tailing's facility and from the active spigot discharge for the time period of this recertification audit. Data reviewed from an external laboratory shows average levels of around 7 mg/l WAD cyanide with a maximum value being less than 15 mg/l.

Cerro Negro maintains the data in EQ-Win, a comprehensive database tool/software, which is used to store, manage, analyze and report on any type of data from environmental monitoring programs.

Cerro Negro has been successful at preventing wildlife mortality. They had zero cyanide- related wildlife mortalities during the time period of this recertification audit. Cerro Negro maintains a formally documented wildlife protection and monitoring program. Operations conduct daily inspections of the tailings facility that include observation for wildlife. The program and complete wildlife inspection forms were reviewed during this recertification audit. The auditors interviewed personnel responsible for the program.

Cerro Negro does not have a heap leach operation.

Standard of Practice 4.5

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

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 4.5

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro does not have any direct or indirect discharge to surface water. Surface water in the vicinity of Cerro Negro is ephemeral, flowing only in response to rainfall; there are no perennial surface water features such as springs, rivers, or lakes immediately down gradient of the process plant or the tailings facility. The nearest flowing surface water body is more than 70 kilometers

downstream from Cerro Negro. The auditors reviewed analytical data from the regional surface water-monitoring program and verified that there have not been any exceedances of WAD or Free cyanide for the time period of this recertification audit. Cerro Negro measures WAD CN, conductivity and pH of the surface water weekly and an external laboratory collected and analyzes the surface
waters monthly.

Cerro Negro has groundwater wells *Muros* 3 and 4 downgradient from the tailing's storage facility. The auditors reviewed analytical data of the two groundwater wells and verified that these wells have no detection of WAD or free cyanide.

There have been no exceedances of free cyanide. Cerro Negro does not have any indirect discharge to surface water. The nearest surface water body is more than 70 kilometers downstream from Cerro Negro.

Standard of Practice 4.6

Implement measures designed to manage seepage from cyanide facilities to protect thebeneficial uses of groundwater.

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 4.6

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro has implemented specific water management and measures to manage seepage to protect the beneficial use of groundwater beneath and immediately downgradient of the operation to accomplish this goal. The TSF has full lining with synthetic materials, has tailings deposition and impounded management techniques. The Process Plant is designed and operated to manage seepage and protect groundwater quality. All solutions are contained in process tanks and columns with secondary containment provided by the concrete floor of the plant in order to prevent seepage to groundwater.

As stated in the las audit report, Cerro Negro has two French drains around the circumference of the plant for monitoring and evacuation of near surface water. French drain number 2 detected low concentrations of WAD cyanide near 0.5 mg/l (analyzed by an external laboratory) in July 2017. Cerro Negro designed and installed a new French drain in November 2017 as a remedial measure. The auditors reviewed analytical data that verifies that WAD cyanide concentrations are non- detect since the installation of the new French drain.

The auditor reviewed the operation's solution management pond liner system, secondary containment systems, the solution recovery systems, the associated operating procedures and interviewed site personnel.

The Argentina government has not established WAD cyanide concentrations in groundwater. The government has established a limit of 0.1 mg/l for total cyanide concentrations. Cerro Negro has twelve groundwater-monitoring wells around the tailing's facility, four of them are up gradient and the other eight are down gradient of the facility. Analytical data from groundwater wells down gradient from the TSF had no detectable concentrations of WAD, free or total cyanide. The laboratory method detection limit for total cyanide is 0.02 mg/L.
Cerro Negro has five groundwater monitoring wells around the process plant area. There are no beneficial domestic or agricultural uses of groundwater beneath and/or immediately downgradient of Cerro Negro. All of the wells are sampled monthly and analyzed for WAD, free and total cyanide along with other water quality parameters. The auditors reviewed analytical results from samplings for the recertification period and verified that the results are non-detect concentrations for WAD, free and total cyanide.

Cerro Negro does not use mill tailings as underground backfill.

There is not a beneficial use of groundwater beneath and/or immediately downgradient of the operation.

Standard of Practice 4.7

Provide spill prevention or containment measures for process tanks and pipelines.

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 4.7

Summarize the basis for this Finding/Deficiencies Identified:

All tanks containing cyanide solution, including cyanide unloading, storage, mixing, leach tanks and all other process solution tanks with 0.5 mg/l or greater WAD cyanide concentrations have secondary containment in Cerro Negro. Containments are adequately sized. Field inspections of the cyanide warehouse and process areas at the plant were conducted during this recertification audit. No changes to the spill prevention or containment measures for cyanide storage, mixing and process plant occurred during the time period of this recertification audit.

As stated in previous audit report, the entire process area, including the cyanide preparation

area, is contained within reinforced concrete pads that conform containment areas surrounded by curbs, parapets and stem walls, providing competent barriers to seepage. Process tanks at the plant are secured to solid, reinforced concrete plinth (pedestal-type) foundations. The secondary containment system is inspected daily as part of the process facilities inspection system. The auditors observed that all tank foundations and concrete secondary containments were in good condition at the time of this recertification audit.

The concrete floor at each containment area is sloped to drain to concrete trench drain, where any spills will be pumped to the grinding thickener tank. There are backup pumps at each sump. The pumps are activated automatically by a water level sensor at the sump and also have manual controls that can be activated from the control room.

The grinding circuit floor and Merrill Crowe area have concrete slabs with containment walls to contain spills within the floor area. Floors are sloped to trenches that directs spillage to sumps that pump the contained liquids and solids back to the grinding thickener tank.

At the agitated leach circuit, a concrete containment slab and containment walls contain rain runoff and process spills. A sump pump (400-PP-010) transfers the water back to the leach circuit or forward to the CCD circuit.

At the tailing cyanide oxidation area, there is a concrete containment slab and containment wall to contain rain runoff and process spills. A sump pump (600-PP-007) transfers the material back to the oxidation tanks or forward to the tailings pump box.

An emergency pond (650-PD-001) is provided to allow draining of the tailing line. The tailing line is a concrete ditch that directs flow to the emergency pond. A pump is provided (650-PP- 018) to pump material from the emergency pond to the tailing box or to the grinding thickener feed box.

No changes to the secondary containments for cyanide offloading, storage, mixing and process plant occurred during the time period since the initial certification audit.

As stated in the previous audit report, the secondary containment areas for the cyanide tanks are linked to provide sufficient containment volume for the largest tank within the linked secondary containment area, pipes leading that would drain back into the area, plus a significant storm event. Containment areas have sump pits with dedicated pumps that return collected solutions back into the process circuit. The secondary containment areas are constructed of reinforced concrete. The design drawings and volume calculations of secondary containments for cyanide storage, mixing and process tanks were reviewed by the auditors during the initial certification audit and were determined to meet Code compliance requirements. The auditors verified that Cerro Negro has retained the design drawings. The auditors observed during this

recertification audit that the secondary containments were maintained empty, with no materials stored within them.

Cerro Negro has dedicated pumps within secondary containment collection areas that remove solutions and return them into the process circuit. There is no discharge of cyanide- containing water from the secondary containment areas. The automatic pumps are part of the defined preventive maintenance program. Water collected in the containment can also gravity drain to the emergency pond. Then water would be pumped from the emergency pond to the tailing box or to the grinding thickener feed box.

Cerro Negro has developed and implemented the Operation Procedure Against a Water Imbalance to maintain control of the plant operation, level of critical tanks level and safe operation of the tailings dam in cases of water imbalance due to atmospheric phenomena. Those conditions could be caused by anomaly rain precipitations, snow, excessive hail and conditions of uncontrolled water.

The operation also has implemented the procedure Monitoring Tank Levels Against Loss of Signal and Control to maintain control of the critical tanks levels by means of visual inspections against loss of signal and losses of control in the control room.

The written procedure to manage tank TK 600-001 levels at Area 600 - Oxidation is also another example of a procedure in place to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water. If there were an overflow in the oxidation circuit it would report to the tailings box and be pumped to the TSF. Tank 1 would drain by gravity to Tank 2.

All cyanide process tanks at Cerro Negro have concrete secondary containment.

All cyanide process solution pipelines at Cerro Negro have spill prevention or containment measure for cyanide solution pipelines to collect leaks and prevent release to the environment. The process solution pipelines at the process plant include concrete secondary containment. The pipeline that carries slurry tailings to the tailing's facility is within a concrete trench. There are no cyanide pipelines at Cerro Negro that are located outside of containment. Cyanide pipelines are inspected daily as part of the routine inspections by plant personnel.

Not applicable because no pipelines associated with Cerro Negro cross any surface waters. The nearest surface water to Cerro Negro is approximately 70 km downstream of the plant. There are some areas of low standing water near the plant. Cerro Negro installed French Drains and monitoring wells. No cyanide has been detected in these wells or drains. The auditors verified no cyanide pipelines present a risk to surface discharge.

As stated in the previous audit report, all cyanide tanks and pipelines at the Cerro Negro process

plant and tailings pond are constructed with materials compatible with cyanide and high pH conditions. They are made of carbon steel, stainless steel, fiberglass, HDPE and polyvinyl chloride (PVC) or other materials compatible with cyanide. Material specifications and construction material testing records for all cyanide-containing equipment were found in compliance.

Standard of Practice 4.8

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

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 4.8

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro implemented quality assurance and quality control (QA/QC) programs during construction of the cyanide facilities at the warehouse, process plant and tailings facility among other installations and facilities and is described and was found to be in compliance in the initial certification audit report.

During this recertification period the mine executed the construction of the TSF Phase 3 related to the TSF expansion capacity, increasing the waterproofing height of the reservoir by 5 meters, allowing the disposal of tailings safely and extending the lifetime of the TSF. The project also included a new pumping station that includes a dock, a barge, pumps, electrical panels and piping.

The works were commissioned to by Knight Piésold in the modality of EPCM (Engineering, Procurement and Construction Management), who was also responsible for the construction QA/QC.

The construction works was divided into work packages. Contractor Sandin was in charge of the TSF south sector wall one, who performed the soil movement and piping installation. The geomembrane installation was assigned to Trine company. The north sector and wall two, was done by Milisic contractor, who was in charge of soil movement, piping and geomembrane installation. Two soil laboratories provide lab tests.

Novasur contractor was in charge of the construction and electromechanical works for the new pumping station that includes a barge, dock, electrical panels , pumps and piping.

As stated in the Cerro Negro previous certification audit report, the QA/QC documentation for

the Process Plant and the tailing storage facility includes appropriate testing concerning the suitability of materials, welding, concrete, adequacy of earthworks and soil compaction, and installation of geomembrane liners. The program included the quality of metal fabrication at the tank vendor. The program included subgrade and concrete testing including suitability of materials, fabrication, electrical, mechanical, instrumentation, piping, concrete, and earthworks.

Cerro Negro QA/QC documentation for the process plant and tailings storage facility includes appropriate testing concerning the suitability of materials, welding, concrete, adequacy of earthworks and soil compaction, and installation of asphaltic liners.

The program included the quality of metal fabrication at the tank vendor. The program included subgrade and concrete testing including suitability of materials, fabrication, electrical, mechanical, instrumentation, piping, concrete, earthworks, soil compaction, and installation of the asphaltic liner in the tailings pond.

QA/QC information for the process plant was reviewed during the initial audit and was found to be in compliance with this standard of practice. The program included the appropriate types of testing, including suitability of materials, fabrication, electrical, mechanical, instrumentation, piping, concrete, and earthworks.

QA/QC information for the TSF Phase 3 construction also addressed the suitability of materials and adequacy of soil compaction for earthworks and earthen liners, the installation of synthetic membrane liners used. Al addressed al QA/QC information for the new pumping station construction as engineering design, metal construction, equipment and electromechanical works and tests.

The auditor reviewed the QA/QC dossier together with as-built plans for each contractor. The new project included 19 tailings discharge points, before there were 12. The revised as-built plans are dated from August 2021, issued by the contractors and approved by the EPCM contractor. Appendix B of the QA/QC dossier contains records of soil lab tests, as granulometry, density, compaction and soil moisture content. In Appendix B the auditor also reviewed geosynthetic, pipes and electrical installation tests, including quality certificates of the bituminous geomembrane, welding, vacuum and samples of destructive tests. Also reviewed piping hydrostatic tests , welding certificates. The construction of the TSF Phase was done between August 2020 to March 2022.

The operation retains QA/QC information for all active cyanide facilities, records were available. The auditor confirmed that Cerro Negro has retained its QA/QC records for all active cyanide facilities that were constructed prior to this certification audit period, as well as for the new any facilities: TSF Phase 3 including the pumping station.

Cerro Negro maintains construction QA/QC files in hard and electronically copies in the document control room at the Process Plant. Physical files and drawings from all cyanide installations are kept organized by area and specialist in the document control room. The auditors verified that the documentation is retained.

As stated in the previous certification audit report, and as was also verified for the works built during this certification audit period, engineering companies performed the QA/QC inspections and reviews during construction and prepared the final construction reports certifying that the facilities were constructed in accordance with the design drawings and technical specifications.

For construction works performed during this certification period, the auditor reviewed records of construction reports, including as-built drawings for the cyanide facilities. A qualified engineer stamped the as-built drawings. QA/QC reports were signed by qualified personnel from reputable engineering companies and provided documentation that the facilities were built as designed. Daily and bi-weekly reports were produced which included QA/QC inspections during construction. Auditors reviewed these documents to verify that the tailings raise was constructed in accordance with the design drawings and technical specifications. The auditor verified that the QA/QC documents are stamped and signed by the engineer and are retained in the on-site document room.

Cerro Negro has as-built drawings/certification for all cyanide facilities which are properly stamped by qualified engineers.

Standard of Practice 4.9

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

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 4.9

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro has written procedures for the monitoring activities used to evaluate the effects of cyanide use on wildlife, surface water and groundwater quality. In addition, the analytical laboratory that conducts the groundwater sampling prepared a sampling plan specifically for Cerro Negro. The wildlife monitoring is site wide. The groundwater-monitoring program includes the process plant (French drains and monitoring wells), emergency pond, the tailings storage facility, and groundwater wells located up gradient from all aspects of the operation and down

gradient from the tailing's storage facility. The surface water monitoring includes two surface water stations (Muros 3 and 4) that collect underdrain water and five regional surface water stations and three springs. A seepage collection system was improved in 2018 and includes two pumping wells upgradient from Muros 3 and 4. The closest surface water body downstream of Cerro Negro is approximately 70 kilometers.

The auditor reviewed the procedures and data records for this recertification audit cycle to demonstrate that wildlife, surface water, and ground water are being regularly monitored. Cerro Negro has not had any recorded cyanide-related wildlife mortalities during this certification period. The auditor reviewed the updated sampling procedures for the seepage collection wells and found it to be appropriate.

As stated in the previous audit report, appropriately qualified personnel in the environmental department developed the wildlife monitoring and surface and groundwater sampling procedures and protocols. The analytical laboratory that conducts the groundwater sampling prepared the groundwater-sampling plan for Cerro Negro.

Cerro Negro has a procedure for groundwater and surface water sampling that describes how representative samples should be taken, field parameters to take, sample preservation, sample handling, shipping instructions, chain-of-custody, field monitoring equipment calibration and quality control. The procedure specifies analysis for total, free and WAD cyanide. A third-party consultant collects the groundwater and surface water samples. The auditor reviewed examples of completed chain-of-custody forms for this recertification audit cycle showing proper use of the forms. Maps showing the monitoring locations with respect to the cyanide facilities were reviewed.

The procedure for groundwater and surface water sampling instructs the sampler to record the field conditions during the sampling activities. The auditors reviewed Cerro Negro's monitoring reports and verified that they record in writing the weather conditions, the presence of wildlife and cattle, field parameters (i.e., conductivity, pH, temperature), groundwater levels, and other characteristics of the water (i.e., color and smell).

Sampling points are numbered and plotted on a map. The date of the sampling, the names of personnel involved, the dates that the samples were analyzed, and the results of the analyses were available for review for all sampling dates. The auditors reviewed completed field forms and verified that these conditions are being registered.

Cerro Negro is a zero discharge facility and does not discharge process water to any location. Cerro Negro monitors groundwater quality down gradient and up gradient of the tailing's facility and the process plant to ensure that no indirect discharges are occurring. There are no surface waters near the site but Cerro Negro conducts surface water monitoring on a regional basis.

Monitoring data is stored in the database EQ-WIN. The auditor reviewed the data to demonstrate that water sampling is being conducted during this audit recertification period. All samples were tested for WAD cyanide. None of the groundwater or surface water had detectable cyanide. The WAD cyanide detection limit for the outside analytical laboratory is 0.005 mg/l. According to the auditor´s professional opinion, the operation conducts monitoring at frequencies adequate to characterize the medium being monitored and to identify changes in a timely manner.

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 protecthuman health, wildlife, livestock, and the environment.

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 5.1

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro has the written mine closure plan for the entire operation, Conceptual Closure Plan, which includes procedures for closuring all cyanide facilities. The useful life of the project is considered with this last update until 2033, of which the closure comprises 5 years and the post-closure 10 years.

The plan considers those aspects of closure that address the cyanide remaining on site upon cessation of production activities and prepares the site for its closure and post closure period, describing the necessary activities for treating, neutralizing, managing cyanide and cyanide containing process solutions remaining in storage and production facilities in preparation for closure so that they do not present a risk to people, wildlife or the environment due to their cyanide content.

Decommissioning activities described in the plan includes activities such as decontamination of equipment, removal of residual cyanide reagents, neutralization of process solutions and installation of measures necessary for management of surface or groundwater such as pumping systems that would operate during the facility's closure period.

For the Process Plant the plan includes, among other activities:

- Chemical neutralization of the facility to < 0.5 mg /L WAD CN.
- Relocation / final disposition of the CN and other reagents when closing.
- Rinse the circuit with freshwater circuit.
- Treatment with oxidant (hydrogen peroxide) to cyanide affected surfaces.
- Demolitions.
- Final disposition of the materials.

Closure procedures for the TSF include:

- Dismantling of facilities associated with TSF.
- Recovery of installations (tanks, pipes / valves etc.) and waste disposal in-situ.
- Flush the surface installations.
- Interception of runoff.
- Chemical stability.
- Periodic monitoring of the deposited tailings.
- Post-closure monitoring for 5 years of leak detection.

The auditors interviewed the Closure Plan Manager and the Superintendent of Environment to review the updated closure plan.

The decommissioning (closure) plan includes a schedule for carrying out its proposed activities. The schedule is years after closure and shows the order in which the planned activities will be conducted and the duration of each activity starting from the point in time the operation ceases production.

Cerro Negro has developed a Gantt Chart Implementation Schedule for the mine closure that includes the major decommissioning activities for the cyanide facilities. The sequence of decommissioning activities is shown with reference to years after closure. This schedule will be refined as Cerro Negro approaches the closure period.

The mine reviews it decommissions plan during the active life of the operation to keep them current and applicable to the actual ongoing operation as it changes over time, to reflect changes in the operation as they affect decommissioning, as well as changes in planned decommissioning techniques and measures.

The mine's decommissioning plan include a provision requiring its periodic review and provides the date of the most recent plan revision -it was updated in 2021 addressing all expansions and modifications to the operation that materially affect the plan and its estimated cost. According to Argentine regulations, the closure plan must be updated every two years together with the environmental impact study.

Standard of Practice 5.2

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

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 5.2

Summarize the basis for this Finding/Deficiencies Identified:

The operation has a cost estimate based on rates applicable to labor and equipment quotes from contractors and vendors in Argentina outside contractors. The cost estimate includes line items for site cyanide-related decommissioning activities and corresponding costs. Newmont has developed a cost estimate model to fully fund third party implementation of the cyanide-related decontamination measures identified in its site's decommission plan. The model uses the Standardized Reclamation Cost Estimator (SRCE). The cost estimate includes add-on percentages for third party engineering design and contract administration. The cost estimate conservatively assumes that cyanide equipment is decontaminated and hauled offsite for reuse or disposal.

The estimate includes the applicable cyanide facilities for milling, leaching, the CCD circuit, the Merrill Crowe plant, the cyanide recovery and oxidation circuit and the tailings storage facility.

Cerro Negro reviews and updates the cost estimate yearly as part of its Asset Retirement Obligation Policy, the corporate financial accounting procedure. The auditors reviewed the February 2022 updated version of a mine-wide closure plan, supporting the mine's stated intent to regularly review and update the decommissioning costs..

The local government jurisdiction does not require financial guarantees; however a third- party financial auditing firm confirmed that Newmont has the ability to fund all of its financial liabilities, including the closure of the Cerro Negro Mine. The auditing firm audits Cerro Negro annually.

Cerro Negro uses self-guarantee as a financial assurance mechanism for the mine closure. The mine provided the auditor with a letter from the qualified financial auditor Ernst & Young (EY) that it has sufficient financial strength to fulfill this obligation, dated from December 2021, which meets the requirements of the Cyanide Code, which in no case can be more than one year old. The estimated cost of decommissioning reflects the most recent plan revision.

Newmont engages EY to perform a financial audit annually, including to express an opinion on whether the consolidated financial statements of the company give a true and fair view the financial position, financial performance, and cash flow of the company. The letter from EY dated August 15, 2022, confirmed that Newmont meets the criteria for self-guarantee without exceptions.

The auditor reviewed the statement from the financial auditor EY and confirmation that the self-guarantee was calculated for an amount that covers the operation's estimated cyanide-related decommissioning cost.

Principle 6 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

Standard of Practice 6.1

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

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 6.1

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro has developed and implemented written procedures for the tasks that require management of cyanide including procedures for unloading, mixing, plant operations, entry into confined spaces, and equipment decontamination prior to maintenance. The operational procedures focused on the mine operations include those reviewed under Standard of Practice 4.1, which the auditor determined they describe cyanide-related safe work practices.

For critical jobs as enter to confined spaces, procedures require to perform the protocol of hazard identification, risk assessment and controls (IPERC by its acronym in Spanish). Maintenance personnel need to obtain a work permit prior to any activities in the process areas. The work permit includes an analysis of the risks associated with the work to be conducted. For non–routine activities the operation requires a work safety analysis (ATS by its acronym in Spanish) where workers evaluate the job that is about to be performed for potential hazards and plan out the work to ensure that the hazards are appropriately managed. Where necessary, procedures address pre-work inspections.

All procedures lists the required Personal Protection Equipment (PPE) such as respirators, personal hydrogen cyanide gas monitors, eye protection, protective gloves and suits, among others. Use of personal protective equipment is also addressed in safety training programs and signs posted in specific work areas. The Health and Safety area has developed a matrix of PPE required for the whole mine, including cyanide facilities. Observations during the audit confirmed that hard-hat, hearing protection, rubber boots, rubber gloves, chemical suits, face shields, approved respirator and HCN monitors were in use for tasks that were performed at the cyanide preparation area.

The operation obtains employee input regarding its health and safety procedures and considers this input in developing and evaluating its procedures. Methods include the daily safety meetings

(5-minute talks), training sessions, investigation of incidents, IPERC and ATS protocols.

During the daily safety meetings there is direct communication between supervisors and operators where worker input is considered to improve existing procedures. Records of daily safety meetings conducted in the last three years including discussion of safety issues related to cyanide were reviewed by the auditors.

Procedures related to cyanide management are reviewed and/or updated periodically with the participation of process operators. Training sessions are conducted to disseminate the updated procedures and feedback is provided by the workforce during those sessions. Records of input from workers and records of training sessions were reviewed by the auditor for the last three years and were found to be complete.

In the case of incidents investigation, workers also have the opportunity to provide input on how to improve safety procedures. The auditors reviewed examples of incidents investigation reports. Although these incidents were not related to cyanide, it was evidenced that the system and mechanism to provide feedback in safety procedures are in place.

Operators and maintenance personnel interviewed demonstrated knowledge and understanding of the company's pre-work risk assessment where workers identify potential risks associated with the work and communicate any potential procedural or other problems to a supervisor. Interviews with medical staff also demonstrated that they had been instrumental in the development of the procedures.

Standard of Practice 6.2

Operate and monitor cyanide facilities to protect worker health and safety and periodicallyevaluate the effectiveness of health and safety measures.

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 6.2

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro has determined the appropriate pH for limiting the generation of HCN gas during cyanide mixing and production activities. Procedure for Cyanide preparation requires a pH of 11.5 at the mixing tank prior to starting the mixing process. pH levels are regulated with sodium hydroxide. Observation of a cyanide mixing event confirmed that the mix tank pH was checked and recorded in the checklist prior to initiating the mixing process. Procedure Sodium Cyanide Dosage indicates pH levels are to be maintained between 10.2 and 10.8 after cyanide

preparation. This is done to limit the evolution of hydrogen cyanide gas during processing activities.

Cerro Negro has online pH probes in their cyanide tanks and process circuits. There are 7 monitoring points located at the mill thickener, leaching tanks #1, #3 and #5, CCD tanks #1 and #2, and at the oxidation tank. pH values are displayed on a monitor in the control room and were verified during the field audit. Fixed pH meters are maintained on a monthly basis for calibration purposes, and every 3 and 6 months for more detailed maintenance work including instrumentation and electrical components. Maintenance and calibration records for the last 3 years were reviewed and found to be complete.

In addition, Cerro Negro samples the pH every 3 hours at the leaching area to ensure that it is being maintained at a high enough level to prevent the generation of HCN. HCN concentrations are monitored daily at different locations throughout the process plants using portable and fixed HCN meters. Daily pH log records were reviewed to verify that the pH was maintained as recommended and found to be acceptable..

Cerro Negro has identified the areas where workers may be exposed to cyanide. Workers are alerted to the need for necessary personal protective equipment through use of signage, operating procedures, and training. When operators are alerted of HCN levels at 2.1 ppm, they withdraw immediately from the area of preparation and at 3.7 ppm will notify the control room, stop all activities and will evacuate the process plant to meet at the safe preset muster point.

These areas are Area 800 at the cyanide preparation tanks including both the platform to access the mixing tank and the lower part of the tanks; Area 300 at the gravitational cyclone; Area 400 at leaching tanks #1 and #3; and Area 600 at the oxidation tanks #1 and #2. Operational areas where there is potential for worker exposure to cyanide are identified and monitored with fixed HCN gas monitoring units. Fixed HCN monitors are located throughout the process plant. Handheld HCN monitors are provided and made available for use in areas where there is a potential for HCN exposure.

Procedures have been developed for all activities in which cyanide management is involved. These procedures include a section where the PPE requirements are listed. Signage listing the PPE requirements to enter a cyanide facility has been installed at appropriate locations. The auditor observed and interviewed workers to confirm that these protective measures are being implemented.

Cerro Negro uses fixed and portable monitoring devices to confirm that controls are adequate to limit worker exposure to hydrogen cyanide (HCN). According to Newmont internal requirements and Argentinian regulations, HCN alarms of both handheld and fixed monitoring devices are set to visually alert operators at 2.1 ppm (preventive) and 3.7 ppm (evacuation), which is more

stringent than the values recommended by the Code. These two HCN values are also specified in the procedures related to cyanide management. HCN visual and audible alarms are set to alert operators.

There are 16 fixed detectors installed: 12 are in the Plant, 2 in the laboratory and 2 in warehouse. In the Plant they are distributed as follows: 1 in hydrocyclones, 1 in the clarifier thickener, 2 in the leaching tanks, 1 in Merrill Crowe (clarifying filters), 2 in the melting area, 2 in Detox, 3 in the sector of preparation and distribution of sodium cyanide. These locations were defined considering cyanide reagent addition points, presence of workers and differential in pH levels as part of the operations. The values of the fixed HCN monitors are displayed on a screen located in the area, as well as in the control room.

Operators use portable HCN monitors to conduct maintenance work, confined space related work and other cyanide related tasks. Personal protection equipment (PPE) requirements defined in cyanide related procedures call for the use of a handheld HCN monitor during specific tasks where there is a potential for exposure to HCN gas. Process operators and maintenance personnel were observed using these monitors throughout the audit. This requirement was verified through review of procedures, observation of monitors during site inspection and discussions with maintenance personnel.

The operation maintains, test and calibrate its fixed and personal (portable) HCN monitoring equipment as recommended by the manufacturer. Records of these activities for this certification period were available for review of the auditor. Records include the actual calibration information.

The HCN fixed monitors are calibrated every 14 days as part of the preventive maintenance program and according to the manufacturer requirements. According to the Gas Monitoring procedure, fixed monitors must be controlled biweekly with gas pattern. Also the electrochemical sensor is checked to ensure it is operational. In addition, Cerro Negro uses a third party contractor to conduct annual calibration of the fixed HCN monitors with tests conducted every three months, as required by the manufacturer. Calibration certificates and records for this certification period were reviewed and found to be complete.

HCN handheld (portable) monitors are calibrated every 24 hours through a bump gas test with an automatic system that controls all parameters. This system also sends an email to the safety coordinator notifying that the equipment has been calibrated. HCN handheld monitors are self-calibrated every 30 days. Once this defined time elapses, the HCN monitor turns off automatically and cannot be used until it is calibrated again. In addition, calibration of the HCN handheld monitors is conducted by a third party contractor every 90 days, as required by the manufacturer.

The procedure Multi Gas Detector Use describes the use and calibration method for the portable multi gas detectors. The procedure Using Industrial Scientific Monitor describe the use and calibration method for the portable HCN monitors.

This requirement was verified through review of calibration and maintenance records and discussion with maintenance and process personnel. Calibration records for the fixed and personal monitors are tracked and recorded in the preventive maintenance system. The auditors reviewed calibration records for the recertification period and found them to be complete. Records are maintained indefinitely.

Cerro Negro alerts its workers about to the presence of cyanide and reminds of the various prohibitions regarding its use. Warning signs are installed on gates entering the Process Plant area on the Plant process buildings, the reagent area, process tank installations, at the cyanide warehouse, and at the tailing's impoundment.

Warning signs are posted in all areas where cyanide is present advising workers that cyanide is in use, indicating that smoking, open flames and eating and drinking are not allowed, and that, if required, suitable personal protective equipment must be worn. The signs are in Spanish, which is the language of the workforce. The PPE requirements are also posted in each area. Verification was through visual inspection of the signs located in areas where cyanide solution is mixed and used. These areas include cyanide storage, preparation and the process plant.

High-strength cyanide solutions at Cerro Negro contain colorant dye for clear identification when observed out of proper containment and for clear differentiation with other solutions or rainwater that may be present. Draslovka, the cyanide producer, includes carmoicine dye in the cyanide package in a concentration that provides a clear visual indicator of the presence of high-strength cyanide solution. As stated in the previous audit report, Cerro Negro has been using a red colorant dye (carmoicine) since June 2017 on high strength cyanide solutions. Procedure Cyanide preparation indicates that 150gr of dye is to be used per ton of cyanide.

Safety showers, eyewash stations and fire extinguishers are available at reagent cyanide off-loading, mixing and storage areas, Process Plant and areas where personnel may be exposed to cyanide in the normal course of their work. The auditor checked the safety shower and eyewash stations to confirm they are operating properly. The safety shower and eyewash station at the cyanide warehouse is located out of the storage area to minimize the potential for leaks from water lines to come into contact with cyanide and expose workers to hydrogen cyanide gas. Showers and eye wash stations are inspected and tested daily and prior to beginning a task that has the potential for cyanide exposure (e.g. cyanide mixing, opening a pipeline for maintenance, others). Dry power fire extinguishers are available where cyanide is present. Fire extinguishers are inspected and tested monthly. In addition, maintenance and recharge of the fire

extinguishers is conducted annually or as needed.

The auditor reviewed maintenance, testing and inspection records performed during this certification period demonstrating that this safety equipment has been routinely evaluated to ensure it is available if needed,.

Cerro Negro identifies with signs and labels tanks and pipes that contain cyanide solution, to ensure that individuals that may come into contact with cyanide or cyanide solutions (including employees involved in maintenance, and any other individual that may be exposed to released solution) be alerted to its presence. Labeling provide workers and others with notice that a dangerous material is present as necessary to protect their health and safety.

Pipes containing cyanide are marked as containing cyanide solution and flow direction is indicated. Cyanide storage and process tanks are marked as containing cyanide. Signage of confined spaces are also placed on cyanide tanks. The auditors followed the cyanide solution circuit from the cyanide mixing area, the process plant area and pipelines transporting tailings to the tailing's storage facility. Verification was by visual inspection.

Employees at Cerro Negro have access to Safety Data Sheets and information on cyanide first aid in areas where cyanide is used and particularly where reagent-strength cyanide is managed, including cyanide storage area, mixing areas, the control room and in areas at the Process Plant where cyanide is used. Sodium Cyanide Safety Data Sheet are also available in medical first aid kits and at the medical clinic; and is referenced in the operational procedure for Cyanide Emergencies, which is part of the Emergency Response Plan (ERP). Verification was through visual inspection confirming that first aid procedures and Safety Data Sheets were available where cyanide is used.

Cerro Negro has the written procedure for investigating and evaluating incidents, including cyanide exposure incidents, to determine if the operation's policies and programs to prevent such incidents are adequate or whether they need to be revised. This procedure is not specific to cyanide incidents.

The auditor reviewed the procedure Incident Investigation as well as records of past investigations. During this certification period there have not been any cyanide exposure incidents. The operation reported an environmental incident on January 6, 2022 in the tailings dam when detecting a welding failure in the geomembrane caused by seepage of tailings under the geomembrane. The auditor reviewed the incident report records and of other incidents not related to cyanide, confirming that the operation is implementing the general program for incident investigation.

The procedure includes two report templates to be used for incident reporting and investigation.

One is the Flash Report to be completed within 24 hours of the incident. This report includes incident location, incident description, incident nature, and immediate measures taken. The other report is the Incident Investigation Report, to be used to conduct a detailed investigation of the incident. This report includes an incident description, personnel involved and injured, physical damages, incident causes, and preventive and corrective actions. Once the investigation is finished, the complete incident report is uploaded in Enablon software, which allows them to track compliance to the corrective actions and to share incidents worldwide in Newmont. They also use Yammer application of the cell phone where they share the incident and generate comments and recommendations.

Standard of Practice 6.3

Develop and implement emergency response plans and procedures to respond to workerexposure to cyanide.

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 6.3

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro is prepared to respond to cyanide exposure emergencies with effective response procedures and trained personnel. The operation has the necessary equipment for emergency response to a worker exposure to cyanide. The operation has available Automated External Defibrillators (AED) resuscitators available and CPR life face masks that can be used with medical oxygen to resuscitate patients that are not breathing. Safety equipment includes cyanide antidote kits, fresh water, oxygen, resuscitators, radios, telephones, and alarm systems in the cyanide storage, cyanide preparation area, process plant area, and at the clinic. All operators in the process area have radios during their daily activities.

Emergency stations with trauma kits are located at the cyanide storage area and throughout the process plant including first aid kit, stretchers, cervical collars, oxygen and burn kit.

Sodium thiosulfate, sodium nitrite and hydroxycobalamin are available at the clinic. Two ambulances are located at the clinic and two additional ambulances are located at the mines that can also be used for evacuation, if needed. Verification was by visual examination and interview with process personnel and the onsite doctor and nurses.

Cerro Negro regularly checks the cyanide emergency response equipment to ensure it is available when required. This includes inspections of cyanide antidote kits, first aid stations, eye wash stations and emergency showers. Inspections include checks for expiration dates of cyanide

antidote kits. Medical personnel periodically inspect the cyanide antidotes.

Hydroxocobalamin is stored at the clinic in a room with temperatures below 77°F. Antidote expiration dates and oxygen tank pressure were checked during the audit. All antidotes were within expiration date and oxygen tanks were fully pressurized.

Cyanide first aid equipment in the process area is inspected prior to cyanide mixing events. Oxygen cylinders and emergency kits are inspected on a biweekly basis to verify that they are in good condition. The medical personnel inspect ambulances every two weeks. Inspection records were available for review during the audit and were found to be complete.

Verification was through visual examination of the antidote expiration dates, interviews with process personnel, onsite doctor and nurses, and review of inspection records. The auditors confirmed that all antidotes are stored at the correct temperature and that they have not expired.

Cerro Negro has developed a specific written procedure called Intoxication with Hydrogen Cyanide (HCN) to respond to cyanide exposures. This procedure describes the steps to be followed in the event of a cyanide exposure including personnel responsibilities, intoxication levels, first aid procedure, medical attention, derivation to the clinic and treatment. The first responder in the scene is the Mining Response Team (ERM team) who will secure the area, assist the victim and provide oxygen. The procedure includes specific instructions for treatment of victims who are exposed to sodium cyanide via inhalation, ingestion, and dermal routes, as well as specific steps to be taken for conscious versus unconscious victims. The medical staff will receive the victim decontaminated by the ERM team for treatment with hydroxocobalamin, if required.

In addition, Cerro Negro has an Emergency Response Plan and a specific procedure for Cyanide Emergencies that include response procedures for cyanide exposures and releases.

Cerro Negro has its own onsite capability to provide first aid and medical assistance to workers exposed to cyanide including 4 ambulances, 43 cyanide antidote kits, defibrillators, oxygen, stretchers and splint, among other medical devices. There is an ambulance in the medical clinic that will be the first choice for transporting a patient to an off-site medical facility, if required.

There is an onsite clinic located nearby the process plant and other two in the mining exploitation areas. Each clinic has a doctor, nurses and ambulance drivers operating 24 hours in two 12- hours shift, totaling about 47 people who attend the clinics. In addition Cerro Negro has around 50 emergency response members distributed in 2 shifts, which names and contact information are referenced in the ERP. The emergency response members receive internal training three times per week and external training on hazardous materials (including cyanide) as

required, which usually occurs every two years. The auditors observed training records during the field visit.

The medical clinic located close the process plant area has a doctor and 2 nurses that are available every shift. The nurses are qualified to provide medical/emergency assistance. Every shift has emergency response team (ERT) that have been trained to provide first aids. The onsite doctors, nurses and the ERT have been trained by an external contractor named HAZMAT Argentina in first aid related to cyanide exposure. The medical clinic is equipped with cyanide antidotes (including sodium thiosulfate, sodium nitrite and hydroxycobalamin, oxygen, first aid kit, and resuscitators. The operation has available oxygen bottles of 4 m3 capacity in 8 first aid cabinets at the areas where cyanide is present, as the warehouse, cyanide mixing area, lixiviation tanks, maintenance area and Merrill Crowe, oxidation process, smelting area and in front of the mill.

Although the operation has the necessary medical capabilities and equipment on-site, Cerro Negro has the procedure Onsite Medical Attention and Transfer to Offsite Facilities, to transport workers to off-site medical facilities for further treatment, if required, and considers medical cases of cyanide exposure.

In the case of cyanide exposure, the victims would be transported via ambulance directly to any of the local hospitals: Las Heras, Pico Truncado, Caleta Olivia, and Comodoro Rivadavia. The closest one is Las Heras that is located 120 km from the mine site (approximately 3- hour drive). For cases where the mine has transferred patients to hospitals, Cerro Negro has an external doctor who will follow up on the patient and serves as a liaison for communications with the mine personnel.

In the event that a cyanide exposure victim requires medical attention beyond the capabilities of the on-site medical clinic, an ambulance is maintained at the clinic to be used to transport victims to hospitals in the area. The Emergency Response Plan (ERP) provides details on how to respond in case of cyanide emergencies and includes contact information for local hospitals. Verification was through interviews with one of the onsite doctors and review of the procedure for evacuation of workers to off-site medical facilities and the ERP.

Cerro Negro has made arrangements with the local hospitals Las Heras, Pico Truncado, Caleta Olivia, and Comodoro Rivadavia to provide assistance to workers exposed to cyanide.

During the period included in this certification audit, 2019 to 2022, Cerro Negro continued with the implementation of the Cyanide Route program, which consist in a series of workshops and training sessions related to cyanide emergencies with communities located along the cyanide transportation route. Personnel from hospitals, local fire departments and police stations participated in these training sessions. As part of these workshops, Cerro Negro donated cyanide

antidotes (Cyanokits) to the hospitals. The purpose of the program is to inform stakeholders and local responders of the use of cyanide at Cerro Negro, verify that the hospital staff is qualified to treat patients that have been exposed to cyanide, to assess the responsiveness of these hospitals in case of an emergency with cyanide and to request them to maintain the cyanide antidotes.

Cerro Negro has determined that the hospitals equipment is adequate and has qualified medical physicians to respond to cyanide exposures. The auditors reviewed records of the meetings and workshops, as well as letters of donation of the cyanide antidotes.

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.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 7.1

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro has an Emergency Response Plan (ERP) and several operating procedures, operating and contingency plans and first aid procedures, or other documents. The operation maintains an ERP to address accidental releases, including cyanide. The ERP describes in general terms roles and responsibilities, activities before, during and after an emergency, activation of the emergency, emergency scenarios including spills of hazardous materials, muster points, evacuation plans and mock drills.

As a complement to the ERP, Cerro Negro has developed and implemented the following procedures, among others, to respond to cyanide related incidents:

- General Procedure for Emergency Response at the Mine
- General Procedure for Emergency Response at the Process Plant
- General Procedure for Emergency Response in Surface
- Emergency Response Team Call Out
- Operational Procedure for Emergencies with Cyanide
- Operational Procedure for Emergencies with Hazardous Materials
- Operational Procedures for Mock Drills
- Inspection of equipment and tools
- Response to Hazardous Substances spills
- Crisis Management
- Procedure for emergency response at the tailing's dams
- Cruz del Sur's Emergency Response Plan for transport of sodium cyanide

These documents combined address several cyanide exposure scenarios such as cyanide transportation incidents, spills and cyanide exposure (through inhalation, absorption, skin contact and ingestion). In addition, the plan describes decontamination procedures, evacuation, emergency contact information, cleanup measures, reporting requirements and others.

Verification was by review of these documents and interview with the Emergency Response Team (ERT) supervisors' personnel.

The ERP along with its complementary plans and procedures constitute a set of well-thought-out and articulated plans that addresses the potential release scenarios at the site in a realistic manner and with an appropriate degree of specificity. The ERP describes how response actions are to be accomplished, and that response actions are site specific. The scenarios addressed in the emergency planning documents are appropriate, the ERP and related documentation are focused on site-specific circumstances and responses respect to cyanide. The auditor confirmed these documents address those release scenarios that may be expected to occur and result in significant impacts to its workers, community and environment, as applicable to the site-specific features of the operation and its environmental setting.

The ERP and supporting procedures for emergency response to cyanide incidents provide response procedures for all potential cyanide failure scenarios required by the ICMC verification protocol for mining operations. These include catastrophic release of hydrogen cyanide; transportation accidents; releases during unloading and mixing; releases during fires and explosions; valve, pipe or tank ruptures; overtopping of ponds and impoundments; power outages and pump failures; uncontrolled seepage; failure of the cyanide destruction process; and failure of tailings impoundments.

Operations will typically need to address releases during transport of reagent cyanide to thesite, even if this is limited to that portion of the delivery route that takes place within the operation's property. This may also include areas in proximity to the site if the operation would assist the producer and/or transporter or if the operation is responsible for such a response. Although not an auditable Code requirement, it is a good practice for operations to enter into mutual aid agreements with other mines or entities located nearby or on its cyanide transport routes.

Newmont works together with its cyanide supplier Draslovka to ensure that all transportation related emergencies are considered and that emergency response plans for such incidents are on file and up to date. In addition to Cerro Negro emergency response team, Draslovka provides emergency response assistance for all of its shipments. Draslovka truck transporter from Puerto Deseado to the mine site is Cruz del Sur, an ICMI certified transporter. The auditor reviewed Cruz del Sur's Emergency Response Plan for transport of sodium cyanide which considers the transportation route, physical and chemical characteristics of the cyanide, method of transport (truck), the condition of the roads and the design of the transportation vehicles. Cruz del Sur transport cyanide in convoys escorted by external contractor Hazmat Argentina, an experienced emergency responder company, travelling with a truck with complete response equipment.

The transporter and Draslovka have responsibility for addressing any off-site incident. Incidents involving off-site and/or transportation of cyanide to Cerro Negro would be called into Draslovka

hotline. Draslovka would then send a team of specialists and/or responders to the scene, as necessary. This requirement was verified through discussion with the ERT supervisors.

The emergency response planning documents do address the types of releases and responses that area expected to occur at the operation and include sufficient details so that personnel know the specific actions they are expected to take in response to the emergency. The emergency response planning documents address the types of releases and responses that can be expected to occur at the site. The documents also include use of cyanide antidotes and first aid measures for cyanide exposure, control of releases at their source, containment, assessment, mitigation and future prevention of releases.

Cerro Negro ERP and supporting procedures describe appropriate actions to be taken in the event of a cyanide spill. These documents specifically address treatment procedures for personnel who may have been exposed to cyanide and procedures for evacuation of the mine.

As Cerro Negro is located in a remote area, and Perito Moreno is the nearest community located approximately 80 km from the mine site, the ERP and procedures do not include emergency considerations for communities. The cyanide transporter addresses emergency response actions for cyanide transport in case of emergencies near communities in its ERP. The Plan defines team member responsibilities, communication procedures for notifying outside emergency response resources, government agencies, the community, other stakeholders and the media.

Standard of Practice 7.2

Involve site personnel and stakeholders in the planning process.

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 7.2

Summarize the basis for this Finding/Deficiencies Identified:

During periodically reviews of the emergency response planning process, site personnel is involved in the emergency planning process, so they can best identify potential release scenarios, available resources, and workable responses. The ERP indicates the responsibilities and role of its workforce during an emergency response situation.

Employees and contractors at Cerro Negro receive cyanide emergency response training depending on their roles and responsibilities. Module 1 is for all new hires; Module 2 is for personnel working in areas where cyanide is used and Module 3 are for emergency response personnel. During these training sessions and through daily meetings, the workforce has the opportunity to provide feedback in emergency response planning.

Another opportunity for the workforce to provide feedback is through evaluation of emergency response mock drills. A debrief is conducted after each mock drill to identify lessons learned from the drills and corrective actions to be taken.

Regarding potentially affected communities, Cerro Negro has continued with the implementation of the Cyanide Route program which includes emergency response training, workshops, and communication about the role of local responders in emergency response planning during cyanide transportation. Personnel from hospitals, local fire department and police participated in these training sessions. In addition, Cerro Negro sponsored specific training on cyanide emergencies, provided by HAZMAT Argentina, to fire departments and hospitals personnel.

This requirement was verified through discussion with ERT supervisors and review of the Cerro Negro ERP, the Cyanide Route program records and the reports of mock cyanide drills performed during the recertification period

Cerro Negro has continued with the implementation of a program with the communities along the cyanide transportation route called “Cyanide Route.” The purpose of the program is to inform stakeholders and local responders of the use of cyanide at Cerro Negro, verify that the hospital staff is qualified to treat patients that have been exposed to cyanide, to assess the responsiveness of these hospitals in case of an emergency with cyanide and to request them to maintain the cyanide antidotes. The program continues to be implemented every year through workshops with the communities located along the cyanide transportation route. These workshops were also conducted at Perito Moreno, which is not in the transportation route, so they know how to respond in case of cyanide emergencies.

The workshop presentation includes topics like introduction to the Cyanide Code, cyanide characteristics, safety practices, uses of cyanide, transportation practices, and the cyanide transportation route. In addition, the communities received a brochure in hardcopy that includes relevant information related to proper cyanide management. The auditors reviewed copies of the workshop presentation and brochure, along with reports of the workshops conducted during the last three years.

Cerro Negro continued involving its stakeholders and communities along the transportation route in cyanide emergency response planning, as part of the Cyanide Route program. Although Cerro Negro ERP does not consider the active participation of outside responders or communities in case of on-site cyanide-related emergencies, external stakeholders including hospitals, local fire departments, police, and communities were engaged and received training related to cyanide emergency response during the recertification period. The ERP does not assign a specific role to external responders in cyanide related emergencies. Cerro Negro

considers the participation of external responders (police, fire department and medical services) only if Cerro Negro's internal response capacity is surpassed.

During the recertification period, the Cyanide Route program has covered the following communities: Rio Gallegos, Piedra Buena, Puerto Santa Cruz, Puerto San Julian, Puerto Deseado and Fitz Roy. Cerro Negro has made arrangements with hospitals to provide assistance to workers exposed to cyanide. The closest hospital to respond in case of cyanide exposure is Las Heras (120 km away) followed by Pico Truncado, Caleta Olivia, and Comodoro Rivadavia. Verification was made through interviews with ERT personnel, review of the ERP and training records to hospital staff, fire departments and police.

Cerro Negro ERP does not designate any specific responsibilities to outside responders and communities. Regardless of that, Cerro Negro has continued involving external stakeholders. Cerro Negro is in regular communication and consultation with its workforce and outside responders to keep the Emergency Response Plan current. Cerro Negro maintains close communications with Cruz del Sur, the cyanide transporter and with local communities to ensure that emergency planning information is maintained and current.

The operation keeps a stakeholder contact information list in its ERP including cyanide supplier, Civil Protection, outside medical facilities, police and fire departments. Cerro Negro also communicates with its workforce to keep the emergency response procedures current. The auditor reviewed the ERP and training records.

Standard of Practice 7.3

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

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 7.3

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan considers the following cyanide-related elements:

a) The ERP and the Crisis Management Procedure describe the responsibilities and level of authority of the Emergency Response Chief and Leaders before, during, and after an emergency, and also includes responsibilities of the General Manager, Managers, Superintendents, supervisors, workers, communications team, evacuation team, mining rescue team, medical services, crisis committee and external services. The plans also includes procedures for alternate emergency response leader.

b) The Emergency Response Team (ERT) is identified in the procedure ERT Call Out and referenced in the ERP. There is an updated list of team members including their names, shift, the areas where they work and contact information. Cerro Negro has 2 ERT shifts, with an of 50 personnel. In case of an emergency, communication will primarily be done by radio or beeper.

c) Cerro Negro ERP requires in Section 3.8 that the ERT must be trained to act in an emergency, know all emergency response procedures and attend the classroom and practical training of the emergency response program. As an Appendix of the ERP, there is an annual training program for the ERT members and includes routine training requirements (3 times a week) and training on specific topics such as Module 3, which is a training program for cyanide emergency responders provided by external contractor HAZMAT Argentina. Verification was conducted through review of training records and certificates.

d) Procedure ERT Call Out includes call-out procedures and updated 24-hour contact information for the ERT members, which is referenced in the ERP. The list of ERT members includes their names, shift, the areas where they work and contact information. In case of an emergency, communication will primarily be done by radio or beeper.

e) The ERP describes in Section 3.0 the responsibilities and level of authority of the Emergency Response Chief and Leaders, before, during, and after an emergency, and also includes responsibilities of the General Manager, Managers, Superintendents, supervisors, workers, communications team, evacuation team, mining rescue team, medical services, crisis committee and external services.

f) Procedure Inspection of Equipment and Tools includes detailed lists of the emergency response equipment located at the process plant, and at the two mines operations. These lists include emergency equipment for the process areas, the medical clinic, ambulances, cyanide antidote kits, HCN monitors, shower and eye wash stations, SCBA (Self Contained Breathing Apparatus), chemical protective suits, spill recovery equipment, extinguishers, among others.

g) Procedure Inspection of Equipment and Tools includes inspection requirements for emergency equipment. Process personnel, ERT members and the medical staff inspect all emergency equipment and supplies on a weekly, biweekly and monthly basis. Inspection records of the antidote kits, oxygen tanks, ambulance in the medical clinic, fire extinguishers, spill response equipment, rescue equipment, and SCBA's were reviewed by the auditors.

h) The ERP does not assign a specific role to external responders in cyanide related emergencies. The ERP states that external responders (police, fire department and medical services) would be called only if Cerro Negro's internal response capacity is surpassed. The ERT Leader, who is responsible to lead the emergency, will determine the role of the external emergency responders. The scope of work for external responders is limited to the "cold area," until the area is secured and the leader of the ERT authorizes their involvement. The ERP includes in Appendix B the contact information of external responders.

Cerro Negro ERP does not assign a specific role to external responders in cyanide related emergencies. Regardless of that, Cerro Negro has continued involving external stakeholders along the transportation route in cyanide emergency response planning, as part of the Cyanide Route program. External stakeholders including hospitals, local fire departments, police, and communities do not participate in mock drills; however, they are engaged and received training related to cyanide emergency response during the recertification period.

The purpose of Cyanide Route program is to inform stakeholders and local responders of the use of cyanide at Cerro Negro, verify that the hospital staff is qualified to treat patients that have been exposed to cyanide, to assess the responsiveness of these hospitals in case of an emergency with cyanide and to request them to maintain the cyanide antidotes. The program continues to be implemented every year through workshops with the communities located along the cyanide transportation route. During the recertification period, the Cyanide Route program has covered the following communities: Rio Gallegos, Piedra Buena, Puerto Santa Cruz, Puerto San Julian, Puerto Deseado and Fitz Roy.

Verification was made through interviews with ERT personnel, review of the ERP and training records of the Cyanide Route program.

Standard of Practice 7.4

Develop procedures for internal and external emergency notification and reporting.

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 7.4

Summarize the basis for this Finding/Deficiencies Identified:

The ERP provides on-site and off-site emergency response contact procedures in Appendix A - Emergency Response Role, which shows the communications flow chart for emergency situations. Appendix B - External Emergency Contact Numbers provide information of external responders, including regulatory agencies, fire departments, police, local medical facilities and Civil Protection. Appendix C - Newmont Emergency Contact Numbers provides information of internal responders. This information was verified through review of the ERP.

Although the nearest community Perito Moreno is located approximately 80 km from the mine operations, the ERP includes in Section 3.6 - Communications Team, the requirement to notify local communities and regulatory entities of emergency situations, if necessary. The procedure and contact information is specified in Appendices A and B of the ERP. In addition, the Crisis Management Procedure clearly defines roles and responsibilities, as well as required actions and

the communications protocol to inform internal and external stakeholders, including the media, of significant emergency situations. This information was verified through review of the ERP and supporting procedures.

Cerro Negro ERP includes a requirement and details to notify ICMI of any significant cyanide incidents, as defined in ICMI's *Definitions and Acronyms* document. Such incidents have not occurred during this certification period.

Standard of Practice 7.5

Incorporate remediation measures and monitoring elements into response plans and account forthe additional hazards of using cyanide treatment chemicals.

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 7.5

Summarize the basis for this Finding/Deficiencies Identified:

The Plan describes specific remediation measures as appropriate for the likely cyanide release scenarios, such as:

a) Cerro Negro has the written procedure Response to Hazardous Substances Spills where in Section 6.2 requires recovery and neutralization of liquid and solid cyanide spills. The procedure requires specific actions depending on the magnitude of the spill: minor, moderate or catastrophic. For moderate spills, the procedure indicates to neutralize with sodium hypochlorite and then proceed to recover the spilled and contaminated materials and dispose them according to the Waste Management Procedure. For liquid spills, the solution will be pumped into suitable containers and disposed of according to the Waste Management Procedure. In addition, Section 6.7 of the Operating Procedure for Cyanide Emergencies describes specific actions for different cyanide spills scenarios including solid cyanide and cyanide solution spills in dry and wet soils, among others. The sodium hypochlorite for neutralization purposes is stored in the HAZMAT trailer in a pre-mixed 8% concentration solution.
b) Procedure Response to Hazardous Substances Spills includes procedures to neutralize contaminated soils as necessary with sodium hypochlorite solution. Section 6.2.4 indicates the final cyanide concentration allowed in residual soil as evidence that the release has been completely cleaned up.
c) Procedure Response to Hazardous Substances Spills indicates that cyanide spill clean-up materials and debris are to be disposed of according to the Waste Management procedure, which indicates that hazardous materials are coded as Y-33 (according to Argentinian

regulations) and should be disposed of in an external secured landfill.

d) The nearest community (Perito Moreno) is located approximately 80 km away from the mine site. As such, it is unlikely that the operation can adversely impact drinking water supplies for this community due to an uncontrolled seepage of process facilities or groundwater contamination. Cerro Negro personnel drink bottled water. This information was verified through discussions with ERT personnel.

There are no waterways in the area near Cerro Negro. The Pinturas River is the closest river to the operations, but it is located in a different basin than the tailings facility. The Deseado River is located more than 70 kilometers downstream from the tailing's facility.

Section 6.5 of the Operating Procedure for Cyanide Emergencies, clearly states that use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide are prohibited in case of cyanide releases to surface waters, as they can severely impact aquatic life. Verification was by review of the ERP and supporting procedures, and interviews with ERT and process personnel.

Procedure Response to Hazardous Substances Spills requires that contaminated water and/or soils are monitored as necessary after a cyanide spill. The document describes procedures for soil sampling including methodologies, parameters and the final cyanide concentration that will be allowed in residual soils as evidence that the spill has been completely cleaned up.

Standard of Practice 7.6

Periodically evaluate response procedures and capabilities and revise them as needed.

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 7.6

Summarize the basis for this Finding/Deficiencies Identified:

As stated in section 3.5 of the ERP, the plan is reviewed every 6 months and updated as required to ensure that information is kept up-to-date and that the plan remains appropriate for the process facilities. The plan will also be reviewed following a mock drill or incident, as needed. The auditor reviewed previous versions of the ERP and the current ERP document. In all cases, the changes made in the ERP were registered in Section 8 Change log. The ERP information was current at the time of the audit.

Cerro Negro conducts monthly mock emergency drills according to an annual mock drill plan included in the operational procedure for Mock Drills. At least two drills per year are related to

cyanide and are based on cyanide release/exposure scenarios to test the response procedures, and incorporate lessons learned from the drills into its response planning.

Drills are developed to include a variety of locations and scenarios including environmental release and exposure responses. Internal observers are included in the drill to evaluate the response. Cerro Negro evaluates the mock drills and identifies corrective actions. Corrective actions are uploaded in Enablon where they are tracked until closed. A debrief is conducted after each drill to identify lessons learned from the drills and corrective actions to be taken. Auditors reviewed the mock drill reports and supporting documentation to verify that action items identified from the mock drills have been closed.

Records were available to demonstrate that emergency response drills were conducted during the last three years. Records indicate the date of the drill, the emergency scenario, the names of the people who participated in the drill, and the results of the drill. The mock drills conducted during this ICMC recertification period involved all personnel that may be expected to respond to cyanide incidents. Verification was through review of records, photos and reports of mock cyanide drills performed during the recertification period.

The ERP calls for an evaluation of the Plan following emergency mock drills and any emergency that required itsimplementation. The operational procedure for Mock Drills requires that each drill is critiqued for deficiencies and corrective action is taken. Appendix D of the ERP includes the form used to evaluate the mock drills. The ERP was updated as necessary after emergency drills.

No update of the Plan was performed due to cyanide incidents as no such emergencies requiring its activation occurred during this audit period.

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.

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 8.1

Summarize the basis for this Finding/Deficiencies Identified:

The operation has written training programs and training materials that provide all personnel who may encounter cyanide with training in recognizing the cyanide materials present at the operation, the health effects of cyanide, the symptoms of cyanide exposure,and the procedures to follow in the event of exposure. The auditor reviewed the training materials and records and interviewed employees to verify that cyanide hazards are addressed and personnel who may encounter cyanide receive this training.

Cerro Negro has developed and implemented three modules for personnel that may work with cyanide:

- Module 1: Is an induction training for all workers related to safe handling of cyanide, cyanide exposure response and first aid, and cyanide antidote awareness. This module is provided to new hires (including contractors) and visitors.
- Module 2: Is a specific training in cyanide for people who work directly with cyanide facilities. It covers the Cyanide Code, procedures for safe use of cyanide, treatment of patients intoxicated with cyanide, and response to cyanide emergencies. This training is provided to process, maintenance and contractors that will work in areas where cyanide is present. This module is usually provided after Module 1 to the workers requiring performing specific works with cyanide.
- Module 3: Is the training for emergency response personnel (doctors, nurses and ERT team members). External specialist provides this training, this year was HAZMAT Argentina.

Written testing is performed for Modules 1, 2 and 3 and confirmation of skills is done via on- the-job observation. In addition to the general training, all employees working in process areas are required to undergo task specific training. Task specific training includes the work procedures. This task specific training is conducted as an on-the-job training program, where experienced supervisors train process workers before they are allowed to work by themselves in the process

plant. A training program for specific training required by each process plant worker was evidenced by the auditors.

Verification was by interviews with process and training personnel, random interviews to operators and review of training materials and employee training records covering the recertification audit period.

Cerro Negro requires employees to have biannual refresher trainings in Module 2 (Cyanide Management) for personnel working with cyanide. Refresher sessions on Module 3 (Emergency Response) for emergency response personnel are conducted as required (usually every 3 years). In addition, personnel working in process areas also receive refreshers on the work procedures, or when there have been changes to the procedures.

Verification was by interview with training, safety and process personnel and review of training records. Records are maintained and were found to be complete for the recertification audit period.

The operation retains the training records pertaining to cyanide hazard recognition and was to demonstrate that personnel received both initial and refresher training in cyanide hazard recognition. The auditors reviewed training records for workers interviewed during the field audit. The records identify the trainer, trainee, topics covered, date and sign off sheet. This requirement was verified through review of a sample of records covering the recertification period.

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.

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 8.2

Summarize the basis for this Finding/Deficiencies Identified:

All personnel involved in the management of cyanide es trained in Cerro Negro to perform their assigned tasks in a safe and environmentally sound manner. Task training is focused to instruct new employees on how to accomplish their assigned tasks safely and ensuring that the tasks are accomplished in a manner that prevents exposures and releases.

Formal training in working procedures was reviewed for all cyanide-related tasks including cyanide unloading, mixing, production and maintenance. Individual training is provided for each specific

cyanide management related task that an operator will perform and includes cyanide task procedures as needed.

Cerro Negro has developed a list of training needs related to cyanide management for each job position according to their responsibilities. Auditors reviewed examples of training records covering the audit recertification period related to loading and unloading of cyanide boxes, cyanide preparation, rinsing of cyanide bags; decontamination of cyanide piping and equipment, mill procedures, use of HCN monitors, flotation, instrumentation and process control.

In addition to the training on specific operational and process procedures, process plant operators and maintenance personnel receive training on Module 2 - Cyanide Management, which includes topics such as use of cyanide in the process, procedures for safe storage, handling and use of cyanide, preparation of sodium cyanide, cyanide dosing points, HCN measurement method, HCN alarms, cyanide exposure, HCN poisoning, treatment of patients intoxicated with cyanide, and response to cyanide emergencies.

In addition to general training (Module 1 and 2), all employees working in process areas are required to undergo task specific training. These procedures define the steps required to complete a task and the procedure itself is used as training material. These work procedures include the objective of the procedures, responsibilities, required PPE, decontamination requirements, risks associated with the cyanide task, and the individual task specific steps.

The task specific training is conducted as an on-the-job training program, where experienced supervisors train process workers before they are allowed to work by themselves in the process plant. A training program for specific training required by each process plant worker was evidenced by the auditors. Presentations, the auditors reviewed training materials, tests and records of these training sessions for the last three years and were found to be complete.

Task specific training to operators is provided by process supervisors and process chiefs who have several years of experience in the different process areas. Supervisors are considered qualified to provide training based on their experience.

Module 1 is given by Virtual Platform managed by the Security Department. Module 2 is dictated by the Media Services personnel, the leader of Emergency Response Team and by the Plant Training and / or trained supervisor. Module 3 is dictated by external company specialists in handling of hazardous substances.

All personnel in job positions that involve the use of cyanide and cyanide management receive training on how to perform their assigned tasks with minimum risk to themselves and their colleagues. Employees that will be working with cyanide receive a classroom training session (Module 2) that covers the Cyanide Code, procedures for safe use of cyanide, treatment of

patients intoxicated with cyanide, and response to cyanide emergencies. A senior/junior on-the-job training approach is used to further train personnel on job activities and cyanide safety.

Task specific training is provided prior to working with cyanide independently. Individual training is provided for each specific cyanide related task that an operator will perform and includes cyanide task, as needed. This requirement was verified by interviews with training and process personnel and a review

Cerro Negro requires employees to have biannual refresher trainings in Module 2 (Cyanide Management) for personnel working with cyanide. Refresher sessions on Module 3 (Emergency Response) for emergency response personnel are conducted as required (usually every 3 years). In addition, personnel working in process areas also receive refreshers on the work procedures, or when there have been changes to the procedures (this is usually done through daily meetings).

Verification was by interview with training, and process personnel and review of training records. Training records and testing are maintained and were found to be complete for the recertification audit period.

Cerro Negro evaluates the effectiveness of cyanide training by written testing and on-the-job observation. Cerro Negro requires written tests to evaluate the effectiveness of cyanide training. Following classroom training, an employee is first supervised in all activities. The supervisor will determine when that individual is then able to perform the task on his/her own. Records of written tests and the employees' understanding of cyanide are retained.

Training records and testing results were reviewed for the audit recertification period and were found to be complete. Verification was by interview with training and process personnel, and a review of training records.

Training records are retained throughout employment history. The records identify the trainer, trainee, topics covered, date and sign off sheet. The results of the testing are also maintained as part of the files. Written tests are completed to demonstrate the employees understanding of the training materials. Verification was through interview with training and process personnel and review of training records.

Standard of Practice 8.3

Train appropriate workers and personnel to respond to worker exposures and environmentalreleases of cyanide.

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 8.3

Summarize the basis for this Finding/Deficiencies Identified:

Cyanide unloading, mixing, production and maintenance personnel are trained in the procedures to be followed if cyanide is released, to decontaminate a cyanide exposure victim. The requirements of operational procedures including emergency response procedures are covered in Module 2 training that includes topics such as oxygen therapy, treatment and first aid to intoxicated patients, and emergency response.

Employees working with cyanide receive specific training in the operational procedure for Cyanide Emergencies and response to spills including neutralization, decontamination, first aid, cyanide antidotes and oxygen dosing. The Cyanide Emergencies procedure addresses several cyanide exposure scenarios such as cyanide transportation incidents, spills and cyanide exposure (through inhalation, absorption, skin contact and ingestion). In addition, the procedure describes decontamination procedures, evacuation and cleanup measures.

Verification included review of training record and interviews with operators as well as process and training personnel. Operators and maintenance personnel in the different process areas were interviewed and demonstrated good awareness of what actions are to be taken in the event of a cyanide release..

Personnel who work in areas where cyanide is present receive training in decontamination and first aid procedures. These personnel include unloading, mixing, and production operators, as well as maintenance workers. Module 2 training includes details on how to respond to cyanide related emergency in case of inhalation, ingestion or skin contact with cyanide. Responses varies depending on if the victim is conscious or unconscious.

The mine also has a full medical clinic located close to the areas in which cyanide is present. Several physicians are on staff, and at least one is on-duty at all times. On their off-hours, the physicians sleep at the mine to ensure that medical assistance is available at the mine at all times. In addition, employees working with cyanide receive specific training in the operational procedure for Cyanide Emergencies and response to spills including neutralization, decontamination, first aid, cyanide antidotes and oxygen dosing.

Cerro Negro provides training to the ERT members three times a week, where some of the topics covered include decontamination of equipment and soil and cyanide spill response. The operation trains its emergency response team members in the use of necessary response equipment. In addition, Hazmat Argentina also provides external training on a regular basis. The auditors reviewed records of these training sessions.

Cerro Negro continued involving its stakeholders and communities along the transportation route in cyanide emergency response planning, as part of the Cyanide Route program.
Although Cerro Negro ERP does not consider the active participation of outside responders or communities in case of on-site cyanide-related emergencies, external stakeholders including hospitals, local fire departments, police, and communities were engaged and receive training related to cyanide emergency response during the recertification period.

During the recertification period, the Cyanide Route program has covered the following communities: Puerto Deseado, Las Heras, Pico Truncado y Perito Moreno. Verification was made through interviews with ERT personnel, review of the ERP and training records of the Cyanide Route program.

Cerro Negro requires employees to have biannual refresher trainings in Module 2 (Cyanide Management) for personnel working with cyanide. Refresher sessions on Module 3 (Emergency Response) for emergency response personnel are conducted as required (usually every 3 years). Verification was by interview with training, and process personnel and review of training records. Training records and testing are maintained and were found to be complete for the recertification audit period.

Training records are retained throughout employment history. The records identify the trainer, trainee, topics covered, date and sign off sheet. The results of the testing are also maintained as part of the files. Written tests are completed to demonstrate the employees understanding of the training materials. Verification was through interview with training and process personnel and review of training records.

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 addressidentified concerns.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 9.1

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro provides the opportunity for stakeholders to communicate issues of concerns through frequent dialogue and engagement with communities of the influence area. The operation has a community attention system (i.e. complaint and grievance mechanism) where communities can raise concerns related to mining activities, including issues related to cyanide management in the operations. This mechanism is openly communicated through different means (e.g. brochures, media, others). Complaints can be received at the community office in Perito Moreno or via mail, email, phone and social media. Complaints are uploaded in Enablon and followed up until they are closed. The auditor reviewed the complaints and grievance procedure and register. No concerns related to cyanide management were received during the recertification period.

Cerro Negro also participates in many public relations and economic development forums and events where stakeholders can have the opportunity to communicate issues of concern regarding cyanide management.

Cerro Negro continued conducting informative workshops as part of the Cyanide Route program. Although Cerro Negro ERP does not consider the active participation of outside responders or communities in case of on-site cyanide-related emergencies, external stakeholders including hospitals, local fire departments, police, and communities were engaged and receive training related to cyanide emergency response during the
recertification period. During the recertification period, the Cyanide Route program has
covered the following communities: Rio Gallegos, Piedra Buena, Puerto Santa Cruz, Puerto San Julian, Puerto Deseado and Fitz Roy.

Standard of Practice 9.2

Make appropriate operational and environmental information regarding cyanide available to stakeholders.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 9.2

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro has developed a presentation that is used for the Cyanide Route program that is presented to communities along the transportation route. The purpose of the program is to provide information on cyanide management procedures related to the environment and safety. The workshop presentation includes topics like introduction to the Cyanide Code, cyanide characteristics, safety practices, uses of cyanide, transportation practices and the cyanide transportation route.

Cerro Negro has developed a Cyanide management brochure including key questions and answers about cyanide management. This brochure is distributed to workers, contractors, communities and visitors and is also distributed during public relation fairs and at the community office in Perito Moreno.

The company publishes an annual Corporate Social Responsibility Report. Other information specifically regarding the Cerro Negro Mine operation is also posted on the internet on the Newmont website.

Information is disseminated in verbal form during Cerro Negro community meetings, and during the mine tours program. Most of the people from the communities located around the mine speak and write in Spanish. Cerro Negro provides information on cyanide in written format (brochure) and verbal form (i.e. presentations provided to communities during Cyanide Route workshops and training sessions). Records and material of the workshops were reviewed.

Cerro Negro is required to report any cyanide exposure and release incidents to the relevant provincial authorities. The information reported to the regulatory agencies will be made available to the public by those agencies. Any significant incidents would be publicly reported in the annual Corporate Social Responsibility Report regarding confirmed cyanide release and exposure incidents that is made publicly available in the Corporate Social Responsibility Report, would separately identify any such incidents occurring at the Cerro Negro operation, so that stakeholders would be aware of their nature and location. The Corporate Social Responsibility Report is

available to the public via Newmont's corporate website.

a) No cyanide exposures have occurred at the Cerro Negro during this recertification period. As described in the procedure Response to Hazardous Substances spills), which is referenced in the ERP, Cerro Negro will report any cyanide exposure resulting in hospitalization or fatality to the relevant provincial authority.
b) No off-site cyanide releases have occurred at Cerro Negro during this recertification period. The mine will report any cyanide releases off the mine requiring response or remediation to the corresponding regulatory agencies and communities as described in the Response to Hazardous Substances Spill procedure.
c) No off-site cyanide releases have occurred at Cerro Negro that would result in significant adverse environmental effects during this recertification period. Do occurred a cyanide release in the tailings dam due to a failure in the geomembrane welding, and although it was not considered to have a significant adverse effect to the environment, Cerro Negro reported it to the authorities, according to the Response Hazardous Substances Spill procedure and to local regulations.
d) No off-site cyanide releases have occurred at the Cerro Negro Mine that would require reporting under applicable regulations since the start of operations but do report to authorities the spill incident described in the paragraph above. Cerro Negro submits voluntarily every 6 months a report to the relevant authorities on all environmental releases, which also includes any cyanide releases.
e) No significant release occurred during this recertification period that cause applicable limits for cyanide to be exceeded.