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International Cyanide Management Institute (ICMI)

1400 I Street NW-Suite 550

Washington, D.C. 20005

United States of America

and:

Nevada Gold Mines LLC

Long Canyon Mine

1655 Mountain City Hwy

Elko, NV 89801

ICMC CERTIFICATION SUMMARY AUDIT REPORT

Nevada Gold Mines LLC

Long Canyon Mine
Oasis, Nevada

12 July 2021

Project No.: 0584083

The business of sustainability

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12 July 2021

ICMC Certification Summary Audit Report

Nevada Gold Mines LLC - Long Canyon Mine

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CONTENTS

List of Figures

1. INTRODUCTION

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

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

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

This summary report has been prepared to meet the requirements and intentions of the International Cyanide Management Institute (ICMI) to demonstrate that following named project has met the obligations in implementing and maintaining the International Cyanide Management Code (ICMC or Code) during the past three-year recertification period.

Name of Project:	Long Canyon Mine
Project Owner / Operator:	Nevada Gold Mines LLC
Name of Responsible Manager:	Julius Stieger, General Manager
Address and Contact Information:	Nevada Gold Mines LLC Long Canyon Mine 1655 Mountain City Hwy Elko, Nevada
Audit Company:	ERM-West, Inc.
Audit Team:	
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Date of Audit:	This audit was conducted February 23-24, 2021
Nature of Certification:	Recertification – First Cycle

2. ATTESTATION

The Long Canyon Mine is	☒	**in full compliance with**	**International Cyanide Management Code**
	☐	in substantial compliance with	
	☐	not in compliance with	

This operation has not experienced compliance problems or significant cyanide related incidents during previous three-year audit cycle.

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

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

Gina Rau		July 12, 2021
Name of Lead Auditor	Signature of Lead Auditor	Date

Name and Signature of Other Auditors:

Taylor Dillon		July 12, 2021
Name of Auditor	Signature Auditor	Date

3. BACKGROUND ON OPERATIONS

The Long Canyon Mine (LCM) is located in northeastern Elko County, Nevada approximately 27 miles east of Wells, Nevada, and approximately 31 miles west of Wendover, Nevada (see Figure 1 for a regional map). The site is accessed via the Interstate 80 (I-80) Oasis/Montello Exit (Exit 378). The LCM currently consists of an open pit, heap leach facility, carbon-in-column (CIC) facility, waste rock storage facility, truck shop, administration building, and other support facilities. The proposed total land disturbance area is approximately 3,875 acres of which 1,791 acres are located on public land and 2,084 acres are located on private land.

The LCM includes an open pit with a series of benches from which oxide waste rock and ore is extracted. NGM uses conventional open-pit, surface mining techniques and equipment including blast-hole drills, hydraulic shovels, front-end loaders, and off-highway haul trucks. Other related mining equipment includes dozers, rubber-tired loaders, motor graders, water trucks and other mobile support equipment.

Run of mine ore is loaded into haul trucks that transport the ore to the heap leach pad located northeast of the open pit, or a stockpile area located near the mine complex facilities for future processing. Waste rock is loaded and hauled to the waste rock storage facility located east-northeast of the open pit or may be placed within mined out portions of the pit. Mining is conducted 24 hours per day and seven days per week.

The mineral processing circuit comprises of those units that are used to hold, treat, process, or transfer minerals during normal and emergency operation of the facilities. The mineral processing circuit consists of the following components:

- Heap leach pad – Phases 1-3
- Process solution collection and conveyance pipelines
- Process Solution Pond
- Pregnant Solution Tank
- Carbon-in-Column (CIC) Plant, including the cyanide storage tanks and unloading area

The ore is placed in lifts on the fully-lined heap leach pad. Lifts range from 30 to 50 feet in height depending on topography and processing needs. A dozer with a ripper attachment rips the surface of each lift to facilitate percolation and minimize ponding of the process solution. A weak sodium cyanide solution is applied to the surface and side slopes of the stacked ore using emitters at an average rate of 0.005 gallons per minute per square foot.

The sodium cyanide solution migrates downward through the stacked ore, leaches the gold contained in the ore, and flows in pipes to a Pregnant Solution Tank (PST) located down-gradient within the Process Solution Pond (PSP) footprint. The solution containing dissolved gold, known as a “pregnant solution”, is pumped from the PST to a CIC recovery system located inside the CIC Plant building next to the PST. During or following an upset condition, the potential exists to overflow the PST. Solution overflow from the PST flows into the PSP. Solution in the PSP is transferred to the Barren Solution Tank (BST) located inside the CIC building via a manually-operated pump.

In the CIC Plant, pregnant solution from the PST is pumped at 2,500-3,000 gallons per minute (gpm) through a series of six (6) columns where gold is adsorbed onto activated carbon. The pregnant solution enters Column 1 and cascades through the columns to Column 6, while the carbon is advanced from Column 6 to Column 1. From Column 1, the loaded carbon (carbon-containing gold) is consolidated and transported via tanker trucks to a refinery located at other NGM facilities for final processing into doré. LCM does not conduct any refining.

The solution exiting the carbon columns (which is now essentially depleted of gold and referred to as 'barren solution') is piped to the BST located within the CIC Plant where sodium cyanide is added, if necessary, before the solution is pumped to the heap leach pad. During or following an upset condition, the potential exists to overflow the BST. Overflow solution flows into the PSP. The overflow level is managed inside the BST such that solution does not overflow the tank, but reports into an overflow partition inside the tank that then feeds into the PSP via a pipe. The heap leach pad and CIC Plant are continuous processes and are operated as a closed system (zero discharge) facility. Fresh water is added as needed to account for evaporation losses. See Figure 2 for the Heap Leach Pad/CIC Plant process flow diagram.

Figure 1. Regional Map

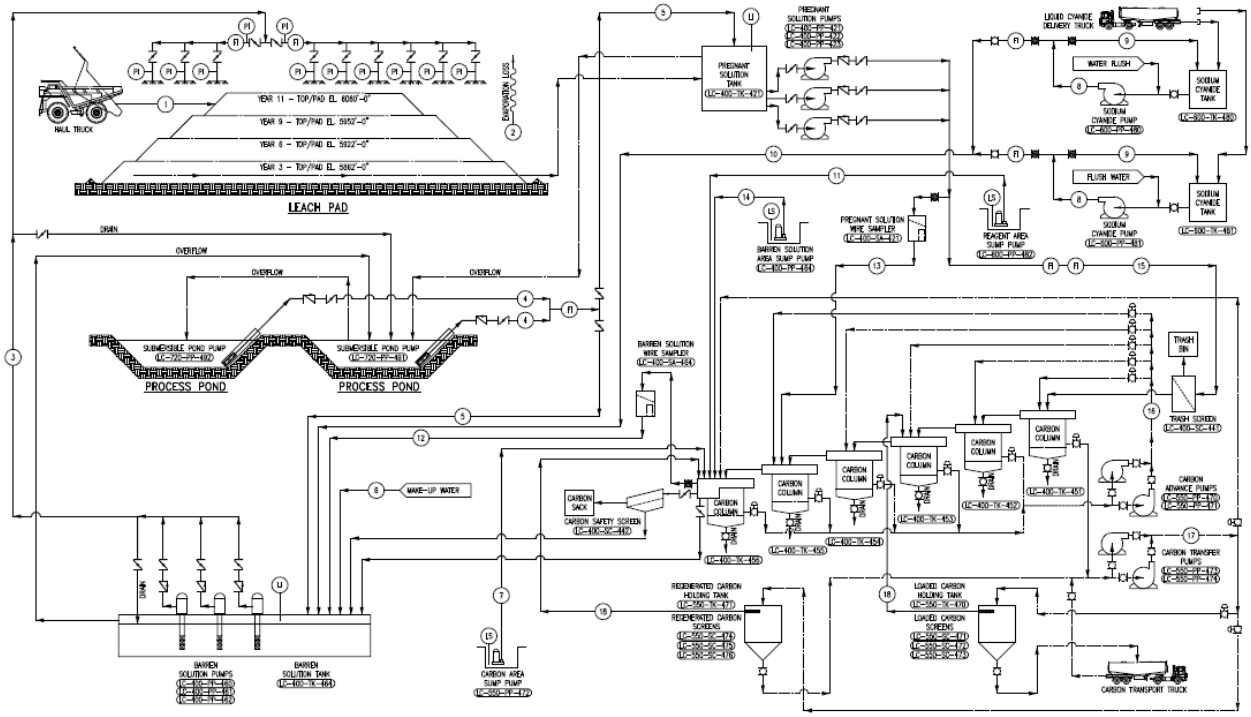

Figure 2. Long Canyon Mine Process Schematic

LCM receives liquid sodium cyanide in specially engineered tanker trucks from Cyanco located in Winnemucca, Nevada. Sodium cyanide is delivered by TransWood. Both Cyanco and TransWood are signatories to the Code and have been certified as compliant with the Code by third-party auditors.

LCM stores and manages sodium cyanide in engineered tanks, pipelines, and a lined pond that have had appropriate quality control and quality assurance performed during construction. LCM workers are trained in cyanide hazards and first aid, first response, emergency response, and specific operational task training. LCM's cyanide facilities are fenced to preclude wildlife and livestock from entering cyanide process areas. LCM conducts daily, weekly, and monthly inspections to ensure that facilities are functioning as designed and to monitor process solutions. Preventive maintenance programs are in place to assure continuous operations. LCM has approved closure and reclamation plans along with financial assurance to complete the appropriate management of cyanide solutions and solids, and the decontamination of cyanide pipelines and equipment.

LCM has a comprehensive environmental monitoring program to evaluate the performance of the ore processing facilities and containments. The monitoring program includes monitoring of the heap leach pad and PSP leak collection systems, sampling and analysis of groundwater and surface water, and sampling and analysis of process solutions and liquids reporting to the Process Solution Pond. Wildlife monitoring is conducted each shift by the operators during facility inspections.

LCM has an emergency response team that is trained to respond to on-site fires, chemical spills, and worker exposures to cyanide. LCM works with local community emergency services to assure that adequate resources are available to address both cyanide-related emergencies.

The only modification to LCM's cyanide management facilities since the 2018 initial certification audit is the Phase II and Phase III expansions of the heap leach pad.

The LCM operation was found to be in full compliance with the International Cyanide Management Code and this operation has not experienced compliance problems during the previous three-year audit cycle.

4. MINING OPERATIONS VERIFICATION PROTOCOL

4.1 Principle 1 – Production

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

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

FINDING:	BASIS FOR FINDING:
The operation in **full compliance** with Standard of Practice 1.1	The Long Canyon Mine (LCM) is in full compliance with Standard of Practice 1.1, requiring the operation to purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide and to prevent releases of cyanide to the environment. LCM purchased its sodium cyanide from Cyanco under three separate contracts during the Recertification Audit period. Cyanco's Winnemucca Production Plant, the cyanide producer, was first certified as compliant under the Code on October 11, 2006, and was most recently recertified on December 19, 2019. LCM's only supply of cyanide has been Cyanco's ICMI-certified plant in Winnemucca, NV for the period of the Recertification Audit; no other suppliers were used.

4.2 Principle 2 – Transportation

Protect Communities and the Environment during Cyanide Transport

Standard of Practice 2.1: Establish clear lines of responsibility for safety, security, release prevention, training and emergency response in written agreements with producers, distributors and transporters.

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 2.1	LCM is in full compliance with Standard of Practice 2.1, requiring that the operation establish clear lines of responsibility for safety, security, release prevention, training and emergency response in written agreements with producers, distributors and transporters. Newmont USA Limited, Barrick Gold of North America, and NGM (and therefore, LCM) have, or had, written cyanide supply agreements with Cyanco, which state that the responsibilities for production, transportation, and delivery of cyanide lies with the Supplier (Cyanco). Cyanco subcontracts to TransWood Inc. for the delivery of cyanide to the site. TransWood Inc. was certified as Code compliant on October 11, 2006 and last recertified on December 10, 2019. Therefore, LCM can rely on the Code certification of the producer and transporter to establish their compliance with Standard of Practice 2.1. LCM maintains onsite an updated cyanide Safety Data Sheet (SDS), dated April 9, 2019, that states the cyanide color is red to light pink and carmoisine dye has been added.

Standard of Practice 2.2: Require that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management.

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 2.2.	LCM is in full compliance with Standard of Practice 2.2, requiring that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management. Transportation of cyanide to the site is the responsibility of Cyanco under the cyanide supply contract. Two of the contracts in force during the Recertification Audit period specifically required that the cyanide be transported by carriers certified and compliant to the Code. The company used to transport cyanide to the site during the Recertification Audit period was TransWood, Inc., who was certified as fully compliant with the Code on October 11, 2006 and was last recertified to the Code on December 10, 2019. TransWood, Inc. was certified as Code compliant over the period of this Recertification Audit.

4.3 Principle 3 – Handling and Storage

Protect Workers and the Environment during Handling and Storage

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 3.1.	LCM is in full compliance with Standard of Practice 3.1; design and construct unloading, storage and mixing facilities consistent with sound accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures. LCM designed and constructed the cyanide unloading and storage facilities in accordance with sound engineering practices. The cyanide unloading occurs on a concrete pad designed to minimize seepage to the subsurface. The slab is sloped and directs water or any spilled cyanide solution to a low point that drains into the larger cyanide storage tank containment area. The cyanide storage tank containment area is also constructed of concrete. The facilities were observed to be in good condition during this Recertification Audit. LCM has not made any changes to these facilities since the initial Certification Audit in 2018. A summary of the design was available, but the actual designs and specifications were not reviewed during the Recertification Audit since the findings of the initial Certification Audit are still valid. LCM located the cyanide unloading, storage, and processing facilities away from people and surface water. The nearest surface water, Johnson Springs Wetland Complex is over a mile from LCM's cyanide facilities. The entire processing area has stormwater controls to reduce the potential for impacted runoff from reaching surface water. No offices or places where workers congregate are located in the vicinity of cyanide facilities. With respect to potential for exposure to the general public, the cyanide facilities, including the heap leach pad, are located within an 8-foot fenced area, the mine has controlled access, and no towns or houses are located in the immediate vicinity. LCM installed digital level indicators with alarms in the cyanide storage tanks to prevent overfilling. The auditors observed tank levels at the storage tank area and the CIC Plant control room screen to verify the indicators were functioning and reviewed maintenance testing records to verify the level indicators and alarms were maintained throughout the recertification period. LCM installed the cyanide storage tanks within a walled, concrete containment area to prevent seepage to the subsurface. The reinforced concrete containment area also provides a competent barrier to leakage. Any liquids present in the containment area will drain to the centrally located sump and be automatically pumped to CIC column 5. This containment has not changed since the 2018 initial Certification Audit. The auditors observed that the containment was in good condition and free of debris. LCM receives only liquid cyanide via tanker trucks. The cyanide is unloaded from the tanker trucks directly to the two cyanide storage tanks. The cyanide storage tanks are located outdoors to prevent the buildup of HCN gas. No incompatible materials, such as acids, oxidizers, and explosives, were stored in the cyanide storage tanks containment area.

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 3.2.	LCM is in full compliance with Standard of Practice 3.2; operate unloading storage and mixing facilities using inspections, preventative maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures. LCM receives only liquid sodium cyanide in tanker trucks; solid cyanide is not received on site. TransWood owns and/or operates the tanker trucks and are only on site for the duration of the unloading event. Once unloaded, the tanker trucks leave the mine site. No empty cyanide containers were observed on site during the Recertification Audit. LCM's Cyanide Off-Loading procedure specifies the PPE that the cyanide delivery truck driver must be wearing during the transfer of cyanide from the tanker truck to the storage tank and the PPE that the LCM operator must have readily available in the event of an emergency. The procedure also includes the operation of valves and emergency response and shutdown requirements. The TransWood delivery truck drivers complete the cyanide offloading. The LCM CIC Plant Operator serves as a 'Safety Buddy' and observes as the driver connects the transfer hose and pressurizes the system and again when the driver blows out the lines and disconnects the transfer hose. During the transfer, the operator either remains in the area during the offloading or views the transfer in the CIC Plant control room via camera. In accordance with the Cyanide Off-Loading SOP, the CIC Plant operator observes the unloading area with the TransWood delivery truck driver after unloading the cyanide and will direct the cleanup of cyanide residue if any is present, including any residue on the hose connections and couplings. Cyanco adds a red colorant dye to the liquid cyanide prior to shipping cyanide. Based on discussions with the CIC Plant Operator and Process Operation Supervisor, LCM CIC plant operators and maintenance personnel are aware that the higher strength cyanide solution delivered to the site is dyed red. Auditors observed that the delivered liquid cyanide solution was colored red. To verify compliance with the offload procedures, the auditors observed a cyanide unloading event and interviewed both the CIC Plant Operator and the TransWood driver. Both demonstrated a thorough understanding of the requirements to perform cyanide unloading, how to prevent and contain releases, and how to prevent or respond to a worker exposure.

4.4 Principle 4 – Operations

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

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

FINDING:

The operation is in **full compliance** with Standard of Practice 4.1**.**

BASIS FOR FINDING:

LCM is in full compliance with Standard of Practice 4.1; implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventative maintenance procedures.

The cyanide facilities at LCM are unchanged from the initial Certification Audit with the exception of the Phase II and Phase III expansions of the heap leach pad. The list of cyanide facilities is as follows:

- Cyanide unloading and storage tank area, including the containment area
- CIC Plant, including the CIC columns, Barren Solution Tank, associated piping, and the building containment area
- Outdoor processing facilities, including the heap leach pad, leak detection systems, barren and pregnant solution lines, pregnant solution tank, and the Process Solution Pond

LCM has designs, plans, and procedures that identify the assumptions and design criteria to prevent or control cyanide releases and exposures and that describe the practices necessary for the safe and environmentally sound operation of the cyanide facilities, including the specific measures needed for compliance with the Code and regulatory requirements. LCM's procedures address cyanide unloading, heap leach operations, CIC operation, and associated facilities.

LCM has developed contingency plans for use of the Process Solution Pond during upset conditions, draindown operations, and large storm events. The Process Solution Pond was designed to contain the runoff from storm events up to the 100-year/24-hour storm event in addition to normal operating flows, draindown from the heap leach pad during a power outage and/or a pump/plant stoppage due to maintenance/repairs for a maximum of 8 hours, and excess heap drainage when transitioning from application of solution on high heap ore to low heap ore. A 1500-kW emergency power generator provides sufficient electrical power for operation of the CIC Plant and heap leach facilities during a power outage.

Based on review of a representative sampling of inspection records, the auditors observed that LCM inspects their cyanide facilities on an established frequency that is sufficient to ensure and document that they are functioning as designed. Operators inspect the CIC Plant each shift for general conditions, housekeeping, equipment leaks, and operational parameters. Heap leach operators inspect the heap leach operations each shift for general operating conditions, ponding, seepage, and presence of wildlife. Inspections are documented on checklists and daily reports that include the inspectors name, date/shift of the inspection, and comments regarding deficiencies. Additional inspections include monitoring of the leak detection systems and annual non-destructive testing of the cyanide storage tanks, CIC columns, and barren solution pipeline. Preventive maintenance inspections have been developed for cyanide-related equipment in the CIC Plant,

Standard of Practice 4.1: Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventative maintenance procedures.	
	including the CIC Plant's emergency power generator. The auditors reviewed a representative sampling of inspection forms from throughout the recertification period to verify compliance. Section 7.0 in LCM's Fluid Management System Operating Plan addresses temporary closures. Permanent closure, or cessation of operations, is addressed in the Tentative Plan for Permanent Closure as required by the Nevada Division of Environmental Protection (NDEP). LCM has adopted NGM's web-based change management application to evaluate changes that may increase the potential for cyanide releases and identify necessary release prevention measures. The system includes the identification of risks and stakeholders, the development of an implementation plan, and requires authorizations from various departments and follow-up actions. Auditors observed that during the Recertification Audit period, two cyanide-related changes have been completed in the system and one other is in progress.

Standard of Practice 4.2: Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.	
FINDING:	**BASIS FOR FINDING:**
Standard of Practice 4.2 is **not applicable** to LCM.	LCM does not have a mill; therefore, Standard of Practice 4.2 is not applicable to LCM.

Standard of Practice 4.3: Implement a comprehensive water management programme to protect against unintentional releases.	
FINDING:	**BASIS FOR FINDING:**
The operation is in **full compliance** with Standard of Practice 4.3**.**	LCM is in full compliance with Standard of Practice 4.3; implement a comprehensive water management program to protect against unintentional releases. During the Recertification Audit period, LCM has maintained a GoldSim Water Balance Model, which is comprehensive and probabilistic, by updating the model on quarterly basis. The model is comprehensive in that it includes the appropriate facilities and processes. The model includes the heap leach pad, Process Solution Pond, associated CIC Plant operation. Inflows include direct precipitation and make up water flows. Given that the heap leach pad and Process Solution Pond are configured as elevated features, no run-on occurs. Outflows include evaporation and saturation of additional ore that is placed on the heap leach pad. Potential power outages are not included since the CIC Plant's back-up generator can power the entire CIC Plant and heap leach operations during a power outage. To prevent uncontrolled overtopping, the Process Solution Pond was designed to contain the 100-year/24-hour storm event and is empty under normal operating conditions. LCM has designed and operated the Process Solution Pond with adequate freeboard of 2 feet as required per LCM's Water Pollution Control Permit. LCM checks the pond level twice per day. The auditors reviewed LCM's

Standard of Practice 4.3: Implement a comprehensive water management programme to protect against unintentional releases.	
	Fluid Management System Operating Plan, spreadsheets, inspection forms, and daily reports to verify compliance. LCM measures precipitation and other meteorological parameters on site. The auditors reviewed spreadsheets and confirmed the inputs to the GoldSim model to verify compliance.

Standard of Practice 4.4: Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.	
FINDING: The operation is in **full compliance** with Standard of Practice 4.4.	**BASIS FOR FINDING:** LCM is in full compliance with Standard of Practice 4.4; implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions. Open waters at LCM include any liquids (process solution or stormwater) that may be present in the Process Solution Pond and ponding on the heap leach pad. LCM has implemented a number of measures to protect birds, other wildlife and livestock including: • Installation of an 8-foot fence around the entire heap leach pad, Process Solution Pond, and CIC Plant with the bottom 4 feet of the fencing having a tighter mesh to minimize access by smaller wildlife, • Under typical operation the Process Solution Pond is dry and weak acid dissociable (WAD) cyanide levels are maintained below 50 mg/L in any liquids that may be present as verified by review of pond WAD cyanide concentrations during the Recertification Audit period, • Heap leach pad operators inspect the heap leach pad each shift for the presence of ponding and take immediate action to correct any ponding they observe, • Pregnant and barren solutions are transferred in pipelines between the CIC Plant and the heap leach pad so that no open waters are present in ditches, and • Cyanide is applied by drip irrigation so that the application rate is tightly controlled and no overspray occurs. LCM personnel are required to report all wildlife mortalities to LCM's Environmental Team. The Environmental Team submits a quarterly report to the Nevada Department of Wildlife (NDOW) that lists all wildlife mortalities and the suspected cause of death. A review of 12 quarterly wildlife reports submitted to NDOW during the Recertification Audit period showed that only one hummingbird died due to the suspected ingestion of process solution. LCM's efforts to maintain a WAD cyanide concentration of 50 mg/L or less in open waters has been effective in preventing significant wildlife mortalities.

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 4.5.	LCM is in full compliance with Standard of Practice 4.5; implement a comprehensive water management program to protect against unintentional releases. LCM operates as a zero discharge facility and does not discharge directly or indirectly to surface water. LCM samples surface water and groundwater on a quarterly basis and has not identified any detectable concentrations of WAD cyanide during the Recertification Audit period.

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 4.6.	LCM is in full compliance with Standard of Practice 4.6; implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater. LCM has implemented measures to protect groundwater. The cyanide storage tank, tanker truck unloading area, and CIC Plant have been provided with concrete containment areas to prevent infiltration to groundwater. The heap leach pad, Process Solution Pond, and process solution pipelines are underlain by geomembrane liners and leak detection systems. Auditors reviewed the Quarterly Water Monitoring Reports submitted during the Recertification Audit period. All results for the groundwater wells that surround the mine site were less than the detection limit of 0.01 mg/L WAD cyanide. This is below the Nevada Groundwater Standard for WAD cyanide of 0.2 mg/L, which is based on the federal drinking water standards. No evidence was observed that indicates seepage from the LCM cyanide facilities is occurring. The beneficial uses of groundwater at the mine and down-gradient are a water supply for processing and drinking water at the mine site. No residents live down-gradient of the mine site. LCM does not currently have an underground mine or mill; therefore, LCM does not use tailings as underground backfill.

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 4.7.	LCM is in full compliance with Standard of Practice 4.7; Provide spill prevention or containment measures for process tanks and pipelines. LCM has provided secondary containment for all cyanide storage and process solution tanks. The cyanide storage tank secondary containment area and the CIC Plant have sumps to collect any liquids. The containment for the CIC Plant has flow through capacity to the adjacent Process Solution Pond for additional

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

	containment capacity. LCM does not discharge from secondary containments to the environment. The sumps are equipped with automatically operated sump pumps that return collected solutions to the CIC circuit. The auditors observed the secondary containments and sumps during the site visit and found them in good condition. LCM has sized and constructed the secondary containments to hold at least 110% of the volume of the largest tank or vessel within its containment. No changes to these secondary containments have been made since the site inspection for the initial Certification Audit in 2017. Therefore, compliance was achieved at that point in time and the findings documented in the 2018 initial Certification Audit report are still valid. During the site visit for the Recertification Audit, the auditors observed that the secondary containments did not contain debris or extraneous materials that would reduce their capacity. LCM has provided spill containment and spill prevention measures for all cyanide-related pipelines. The barren and pregnant solution pipelines between the heap leach pad and the CIC Plant are located in a lined ditch with the pregnant solution line covered by gravel. The ditch liner system consists of two geomembrane liners with an interlayer of geonet. Any liquids that are captured in the ditch, such as rain water, flow through the gravel in the ditch and eventually report to the Process Solution Pond. If the top liner is damaged (e.g., develops a hole, tears), any liquid that passes through the top liner will flow through the geonet layer to the leak detection sump. In addition, the solution pipelines and ditch are inspected each shift and the barren solution line wall thickness is tested annually. The auditors observed the containment ditch for the pipelines to be in good condition during the site inspection. LCM has determined that the locations of the cyanide pipelines do not pose an undue risk to surface water due to the distance between the pipelines and the nearest surface water. LCM has constructed process tanks and pipelines of carbon steel, HDPE, and corrugated polyethylene. These materials are compatible with cyanide and high pH conditions. The auditors observed these materials during the site inspection and reviewed the Record of Construction Reports for the heap leach pad expansions to verify compliance.

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

FINDING:	**BASIS FOR FINDING:**
The operation is in **full compliance** with Standard of Practice 4.8.	LCM is in full compliance with Standard of Practice 4.8; implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications. Other than the Phase II and Phase III heap leach pad expansions, LCM did not make any changes to the cyanide facilities since the 2018 Initial Certification Audit. Therefore, compliance was achieved at that point in time and the findings of the 2018 Initial Certification Audit report are still valid. To summarize, the previous audit report found that LCM implemented QA/QC programs during the construction of the cyanide facilities. The content of these QA/QC programs addressed earthworks, concrete, and waterstops for foundations, and subgrades

Standard of Practice 4.8: Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.	
	and geomembrane liner installation, integrity tests and weld inspections for tanks and pipelines. LCM used appropriately qualified personnel to review QA/QC records. The QA/QC programs implemented for the Phase II and Phase III heap leach pad expansions are documented in the Record of Construction Reports that were prepared by NewFields and submitted to the Nevada Division of Environmental Protection (NDEP). The QA/QC programs for the heap leach pad expansions addressed subgrade preparation, grading, soil liner material properties and compaction characteristics, soil liner hydraulic conductivity, leak detection construction, solution collection piping, geomembrane liner installation, and testing. The construction reports include copies of the field inspection reports, laboratory and field data, construction observations, drawings, and photographs. LCM retained qualified engineering personnel to review and provide construction verification documentation. The Record of Construction reports generated for the Phase II and Phase III heap leach pad expansions provide documentation and as-built drawings and were stamped by a Professional Engineer licensed in the State of Nevada. LCM has retained QA/QC documentation for the construction of all cyanide facilities located at LCM.

Standard of Practice 4.9: Implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and groundwater quality.	
FINDING: The operation is in **full compliance** with Standard of Practice 4.9**.**	**BASIS FOR FINDING:** LCM is in full compliance with Standard of Practice 4.9; implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and groundwater quality. Section 5 of the Fluid Management System Operating Plan provides procedures for the monitoring of groundwater, surface water, and process solutions. This Plan was updated in November 2019 and April 2020 by the LCM Environmental Department and was reviewed and approved by NDEP. The Plan outlines sample location and frequency, provides sample preservation, chain of custody, shipping instructions, and identifies the cyanide species to be analyzed. Environmental conditions are noted in the field on an iPad and uploaded to and stored in the Monitor Pro database. The auditors reviewed records in Monitor Pro to verify compliance with the Code requirements. LCM monitors for cyanide at two surface water locations and in 9 down-gradient groundwater monitoring wells. LCM conducts the monitoring at frequencies that are adequate to characterize changes in groundwater and surface water quality in a timely manner. Both the groundwater and surface water monitoring frequencies are quarterly. LCM Heap Leach Operators and CIC Plant operators inspect for wildlife mortalities each shift and document their observations on separate forms. Any wildlife mortalities that are discovered are reported to the LCM Environmental Department who compiles the data and submits quarterly reports to NDOW. The auditors reviewed the quarterly wildlife mortality reports that were submitted during the Recertification Audit period and only one hummingbird was suspected to have passed from the ingestion of cyanide.

4.5 Principle 5 – Decommissioning

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

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 5.1.	LCM is in full compliance with Standard of Practice 5.1; plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock. LCM has planned for effective decommissioning of the cyanide facilities to protect humans, wildlife, and the environment. LCM has developed a mine-wide Tentative Plan for Permanent Closure and a Reclamation Plan. The Tentative Plan for Permanent Closure includes procedures for closure of cyanide-related process components. The process component procedures include procedures for characterizing spent process materials and for stabilization of process components (Heap Leach Facility, Residual Process Water and Pond Sediments, and Process Plant and Associated Facilities). Table 4 of the reclamation plan presented a Gantt chart showing the reclamation schedule in terms of years after closure. Both the Tentative Plan for Permanent Closure and Reclamation Plan were updated in 2020 and are reviewed by the site annually.

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 5.2.	LCM is in full compliance with Standard of Practice 5.2; establish an assurance mechanism capable of fully funding cyanide related decommissioning activities. LCM has established a financial assurance mechanism capable of fully funding cyanide-decommissioning activities. The Long Canyon Mine Reclamation Plan summarizes the current decommissioning costs for the appropriate facilities and activities. LCM has reviewed and updated the decommissioning costs throughout the recertification period as required by NDEP and the Bureau of Land Management (BLM) as well as NGM's internal requirements. The auditors reviewed the reclamation plan costs and the Nevada Standard Reclamation Cost Estimator that LCM utilizes for cost estimating to verify compliance. LCM has developed a cost estimate for the funding of third-party implementation of the cyanide-related decommissioning activities identified in the site closure and reclamation plans. LCM has a Letter of Credit and bond rider accepted by NDEP and BLM as a financial mechanism. The amount covers mine-wide closure, which is considerably greater than the cost for cyanide decommissioning alone.

4.6 Principle 6 – Worker Safety

Protect Workers' Health and Safety from Exposure to Cyanide

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 6.1**.**	LCM is in full compliance with Standard of Practice 6.1 requiring that the site identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them. LCM has developed Standard Operating Procedures for the CIC Plant, heap leach operations, maintenance, and for general site safety that specify the working procedures and PPE required to eliminate, reduce, and control risks of cyanide exposure. The procedures, and supplemental checklists that accompany some of the procedures, specify the requirements for PPE and pre-work inspections and verify that these precautions are taken. A change management procedure is in place to ensure that proposed process and procedural changes consider and address worker safety. Worker input is achieved through various mechanisms including a Vital Behavior Team, safety meetings, trainings, and standard operating procedure (SOP) reviews.

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 6.2.	LCM is in full compliance with Standard of Practice 6.2 requiring that the site operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures. LCM has determined the appropriate pH for cyanide-containing process solutions. LCM uses both fixed and portable HCN monitors to ensure that worker exposure to HCN gas is less than exposure limits. The monitors are set to alarm when the HCN concentration reaches 4.7 ppm, which triggers an investigation for the source of elevated HCN concentration, and the monitors alarm again if the HCN concentration reaches 10 ppm, which requires an evacuation of the CIC Plant. Areas of exposure to HCN concentrations that could equal or exceed 4.7ppm have been identified and signage has been posted in these areas. Operating and maintenance procedures have been developed that specify the PPE to be worn and gas monitoring to be conducted when performing tasks that could lead to this exposure. The fixed HCN monitors and portable multi-gas detectors are calibrated in accordance with the manufacturer's recommendations. Records of calibration are kept on site for at least one year.

Standard of Practice 6.2: Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.	
	Warning signs have been placed in all areas where cyanide may be encountered, including solution ponds and the heap leach pads, and on all cyanide facilities warning that the tanks and pipes may contain cyanide solutions. Signage also prohibits eating, smoking or drinking in cyanide areas. Purple paint has been applied to cyanide piping in the CIC Plant where accessible, while all process solution pipping is labelled with contents and direction of flow. Emergency showers and eye wash stations are located within the CIC Plant and next to the cyanide storage tanks/offload area where the risk of cyanide exposure exists and are checked regularly during workplace inspections and through planned maintenance. Type ABC fire extinguishers were located at numerous places throughout the CIC Plant and cyanide storage tanks/offload area. The inspection records attached to the fire extinguishers indicated that inspections are up to date. Safety Data Sheets are available on all computers in the workplace through the 3E database, and are written in English (the language of the workforce). Procedures are in place to report and investigate incidents, including cyanide exposures, and to modify procedures based on any corrective actions and findings identified in incident investigations.

Standard of Practice 6.3: Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.	
FINDING: The operation is in **full compliance** with Standard of Practice 6.3**.**	**BASIS FOR FINDING:** LCM is in full compliance with Standard of Practice 6.3 which requires that the site develop and implement emergency response plans and procedures to respond to worker exposure to cyanide. LCM stores their cyanide antidote kit (amyl nitrite), oxygen, an Automatic External Defibrillator (AED), and a Laerdal Pocket Mask Resuscitator in the cyanide facilities and inspects and maintains them on a regular basis. Workers are trained in the use of amyl nitrite and oxygen on an annual basis. LCM provides 24-hour coverage onsite with qualified First Responders that are able to administer oxygen and amyl nitrite and use the AED and Pocket Mask Resuscitator as needed for treating potential victims of cyanide exposures. First aid equipment is regularly inspected to ensure it will function correctly and items are replaced after reaching their expiration dates. LCM has specific written plans for dealing with cyanide exposures, including emergency response and first aid. LCM has an on-site ambulance and emergency response trailer. All staff that work with cyanide are trained in providing first aid for cyanide exposures. LCM has a process in place to summon outside assistance and transport cyanide exposure victims to Northeastern Nevada Regional Hospital using an offsite ambulance or air evacuation services. LCM has an agreement with Northeastern Nevada Regional Hospital in which the hospital agrees to treat cyanide exposures. LCM performs mock drills to test the emergency response procedures developed at site and incorporates learnings from these drills into revised procedures.

4.7 Principle 7 – Emergency Response

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

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 7.1.	LCM is in Full Compliance with Standard of Practice 7.1 which requires that the site prepare detailed emergency response plans for potential cyanide releases. LCM has a detailed and comprehensive written Emergency Response Plan and Fluid Management System Operating Plan that work together to address cyanide releases. The plans consider all reasonably foreseeable cyanide failure scenarios, including offsite and onsite transportation incidents, and cyanide releases associated with cyanide facilities. Cyanco, LCM's cyanide supplier, is responsible for any transportation accidents resulting in a cyanide spill during transport and until the cyanide delivery at LCM. The plans address the potential need for evacuations. The Emergency Response Plan describes procedures to respond to exposures, including the use of specialized first aid equipment, antidotes and measures to control cyanide releases. Prevention of future releases is dependent on incident investigation procedures outlined in the Incident Management and Investigation Standard that requires the identification of corrective and preventive actions following a cyanide-related incident. Contact information in the event of an emergency is provided for external agencies and nearby communities.

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 7.2.	LCM is in full compliance with Standard of Practice 7.2, which requires that the site involve site personnel and stakeholders in the planning process. The LCM workforce participates in the emergency response planning process by attending and contributing to daily safety meetings as well as participating in the mock drills that are conducted on site. LCM does not have any nearby communities that would be affected by cyanide releases at the site; however, LCM does conduct quarterly community meetings and discusses, among other issues, cyanide risks and use at the site. LCM's Emergency Response Team participates in Local Emergency Planning Commission (LEPC) meetings along with one or more of the NGM Emergency Response Team members. LCM maintains on-site capability to respond to cyanide emergencies and has an agreement in place for mutual aid emergency response with LEPC. LCM maintains an agreement with Northeastern Nevada Regional Hospital to provide medical treatment for cyanide exposures.

Standard of Practice 7.2: Involve site personnel and stakeholders in the planning process.	
	LCM's Emergency Response Plan provides current contact information for Elko County Dispatch, emergency services, and regulatory agencies that would be notified in the event of a cyanide incident.

Standard of Practice 7.3: Designate appropriate personnel and commit necessary equipment and resources for emergency response.	
FINDING: The operation is in **full compliance** with Standard of Practice 7.3**.**	**BASIS FOR FINDING:** LCM is in full compliance with Standard of Practice 7.3, which requires that the site designate appropriate personnel and commit necessary equipment and resources for emergency response. LCM maintains sufficient on-site capability to respond to cyanide incidents and has agreements in place with Northeastern Nevada Regional Hospital and the LEPC if offsite response is needed. LCM maintains an agreement with the Northeastern Nevada Regional Hospital to provide treatment for cyanide exposures. LCM's Emergency Response Plan provides contact information for external parties that would be informed in the event of a cyanide-related incident.

Standard of Practice 7.4: Develop procedures for internal and external emergency notification and reporting.	
FINDING: The operation is in **full compliance** with Standard of Practice 7.4.	**BASIS FOR FINDING:** LCM is in full compliance with Standard of Practice 7.4, which requires that the site develop procedures for internal and external emergency notification and reporting. LCM has established internal reporting requirements, and the Emergency Response Plan along with the Crisis Management Plan identifies roles, responsibilities, and procedures for external communication related to cyanide incidents and emergencies. The Emergency Response, Crisis Management Plan, and related documents give details for contacting external parties, and roles, responsibilities and procedures for communications with the media.

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 7.5.	LCM is in full compliance with Standard of Practice 7.5, which requires that the site incorporate in response plans, and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals. The Fluid Management System Operating Plan specifies specific remediation measures for cyanide releases. These measures include response procedures, clean-up standards, and the disposal of clean-up residuals. LCM does not store treatment chemicals on site. In the event a cyanide spill affects the potable water supply for the mine site, LCM will provide bottled water to its employees. A cyanide release at LCM is not expected to impact surface waters due to the distance to the nearest surface water. In the event of a cyanide release, the LCM Fluid Management System Operating Plan details neutralization, cleanup, and disposal requirements in the event of a process solution release. All cyanide-contaminated soil will be placed on the heap leach pad. The soil will be excavated until the cyanide concentration level is below the requirements outlined by NDEP. LCM coordinates soil-sampling requirements with NDEP. The Long Canyon Cyanide Equipment Decontamination SOP details procedures for the decontamination of equipment, materials, or spill clean-up debris that may come into contact with cyanide solution during the remediation of a cyanide spill.

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 7.6.	LCM is in full compliance with Standard of Practice 7.6, which requires that the site periodically evaluate response procedures and capabilities and revise them as needed. LCM performs mock cyanide emergency drills. LCM updates the Emergency Response Plan at least annually and as needed following mock drills or cyanide-related events. The Fluid Management System Operating Plan, which details emergency response for cyanide releases, is reviewed annually.

4.8 Principle 8 – Training

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

Standard of Practice 8.1: Train workers to understand the hazards associated with cyanide use.	
FINDING: The operation is in **full compliance** with Standard of Practice 8.1.	**BASIS FOR FINDING:** LCM is in full compliance with Standard of Practice 8.1, which requires that the site train workers to understand the hazards associated with cyanide use. LCM provides cyanide awareness training and related operating procedure training to all relevant workers, and includes an annual refresher training requirement. LCM has developed training criteria that identifies the required training for all workers in the CIC Plant and heap leach facilities, including training on cyanide-related procedures. LCM maintains records of training on site for all current employees.

Standard of Practice 8.2: Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.	
FINDING: The operation is in **full compliance** with Standard of Practice 8.2.	**BASIS FOR FINDING:** LCM is in full compliance with Standard of Practice 8.2, which requires that the site train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment. LCM trains workers to undertake cyanide-related tasks safely through induction training, cyanide awareness training, training criteria checklists, and SOP reviews. The training materials identify the elements necessary for the safe performance of each job, based on the site's operating procedures. Appropriately, qualified personnel deliver the training. Trainers are lead personnel, supervisors, experienced personnel, or a combination of all three that have experience with the task in which they are training and have trained other operators. Employees are trained prior to working with cyanide and, a competent person confirms transfer of knowledge. Job task observations and Cyanide Code Assessments are performed to evaluate the effectiveness of the training and confirm people's understanding. Training criteria checklists, which include safety and environmental topics related to cyanide, are required to be completed for CIC Plant and heap leach pad operators. New employees must demonstrate knowledge of all tasks identified in the checklists by a competent trainer. Refresher training for cyanide awareness is completed annually.

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.	
	Detailed records of training are retained as hard copy records stored at the Administration Building, supported by some records that are also kept electronically.

Standard of Practice 8.3: Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.	
FINDING: The operation is in **full compliance** with Standard of Practice 8.3**.**	**BASIS FOR FINDING:** LCM is in full compliance with Standard of Practice 8.3, which requires that the site train appropriate workers and personnel to respond to exposures and environmental releases of cyanide. All workers who work in or may enter cyanide areas are trained in the appropriate emergency response for worker exposure and environmental releases of cyanide. Emergency responders are trained in cyanide decontamination and first aid procedures and participate in mock emergency response drills. Emergency responders are also trained in the procedures included in the Emergency Response Plan concerning cyanide. All Emergency Response Team members are trained in equipment that is used for responding to cyanide related exposures and releases. An agreement is in place for Northeastern Nevada Regional Hospital to treat workers exposed to cyanide. NGM has a mutual aid agreement with the LEPC. Refresher training in cyanide emergency response is completed annually. LCM completes cyanide emergency response mock drills. Emergency response mock drills are evaluated and lessons learned captured and incorporated into corrective actions. The mock drills that have taken place at LCM from 2018 through February 2021 cover both worker exposure and environmental release of cyanide solution. Emergency response training records are retained in hard copy at LCM's Administration Building.

4.9 Principle 9 – Dialogue

Engage in Public Consultation and Disclosure.

Standard of Practice 9.1: Provide stakeholders the opportunity to communicate issues of concern.

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 9.1.	LCM is in full compliance with Standard of Practice 9.1, which requires that the site Provide stakeholders the opportunity to communicate issues of concern. LCM hosts quarterly meetings for the communities to raise awareness of cyanide usage and provide community members with an opportunity to raise issues of concern. A toll free hotline and an email address is available to the community so that they can place grievances. In addition, the public is able to make comments during the public comment period for permit modification or renewal applications.

Standard of Practice 9.2: Initiate dialogue describing cyanide management procedures and responsively address identified concerns.

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 9.2.	LCM is in full compliance with Standard of Practice 9.2, which requires that the site initiate dialogue describing cyanide management procedures and actively address identified concerns. LCM regularly provides information to local communities regarding cyanide use and management at the site, through the site tours, quarterly information sessions, and factsheets.

Standard of Practice 9.3: Make appropriate operational and environmental information regarding cyanide available to stakeholders.

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 9.3.	LCM is in full compliance with Standard of Practice 9.3, which requires that the site make appropriate operational and environmental information regarding cyanide available to stakeholders. LCM makes operational and environmental information regarding cyanide available through community presentations, site tours, and online information. Some information is also available on the Nevada Division of Environmental Protection public website. The cyanide related release LCM had in December 2020 is not listed in the NDEP database because it did not elevate to the level of needing to involve the Bureau of Corrective Actions. The majority of the local population is literate and so written information is considered adequate, although the community presentations include verbal and visual communication materials. Information regarding cyanide releases is made available through regulatory reports and Barrick's Annual Report and annual Sustainability Report.

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