

# ***SUMMARY AUDIT REPORT***

***Newmont Corporation Merian***

***Mine, Suriname***

***For The***

***International Cyanide Management Code***

**November 2020**



# SUMMARY AUDIT REPORT

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## SUMMARY AUDIT REPORT

Name of Mine: Merian

Name of Mine Owner: Newmont Corporation

Name of Mine Operator: Newmont Corporation

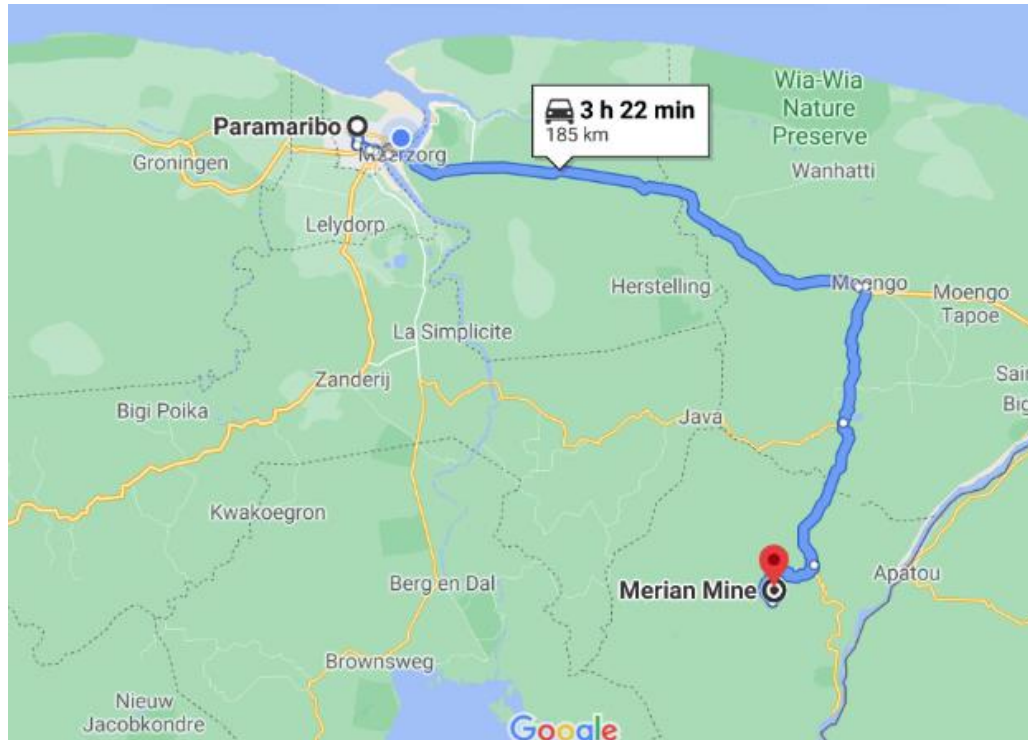
Name of Responsible Manager: Melissa Graham - Manager – Environment  
Lelis Giuliani Abanto Fuentes – Current Manager - Environment

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State/Province/Country: Paramaribo, Suriname

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Location detail and description of operation:



Merian

Name of Mine

Signature of Lead Auditor

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## SUMMARY AUDIT REPORT

Merian gold mine is located in the northeastern Suriname, approx. 98 kilometers southeast of the capital city of Paramaribo; 60 kilometers south of Moengo. The mine is an open pit exploitation with an estimated mine life of 12 to 14 years and annual gold production of 393 attributable Koz. Date of first production was Q4 2016.

Newmont operates the Merian mine on behalf of Suriname Gold Project CV, a Suriname limited partnership. Newmont Suriname is the managing partner, owning a 75 percent interest in the limited partnership, and Staatsolie Maatschappij Suriname N.V. (Suriname's State-owned oil company), the limited partner, owns the remaining 25 percent interest.

Newmont began operating the project in 2004 and began construction in August 2014. Commercial production was achieved on October 1st, 2016. Among the main components of this mining operation are:

- Two open pits (Merian II and Maraba);
- Four waste rock disposal areas (North, Maraba, East and West);
- Processing plant and maintenance workshops;
- Treated Water Storage Reservoir (TWSR);
- 62.3 MW heavy fuel oil power plant;
- Tailings Storage Facility (TSF);
- Sedimentation ponds;
- Potable water treatment plant; and
- Effluent Treatment Plant (ETP).

Merian

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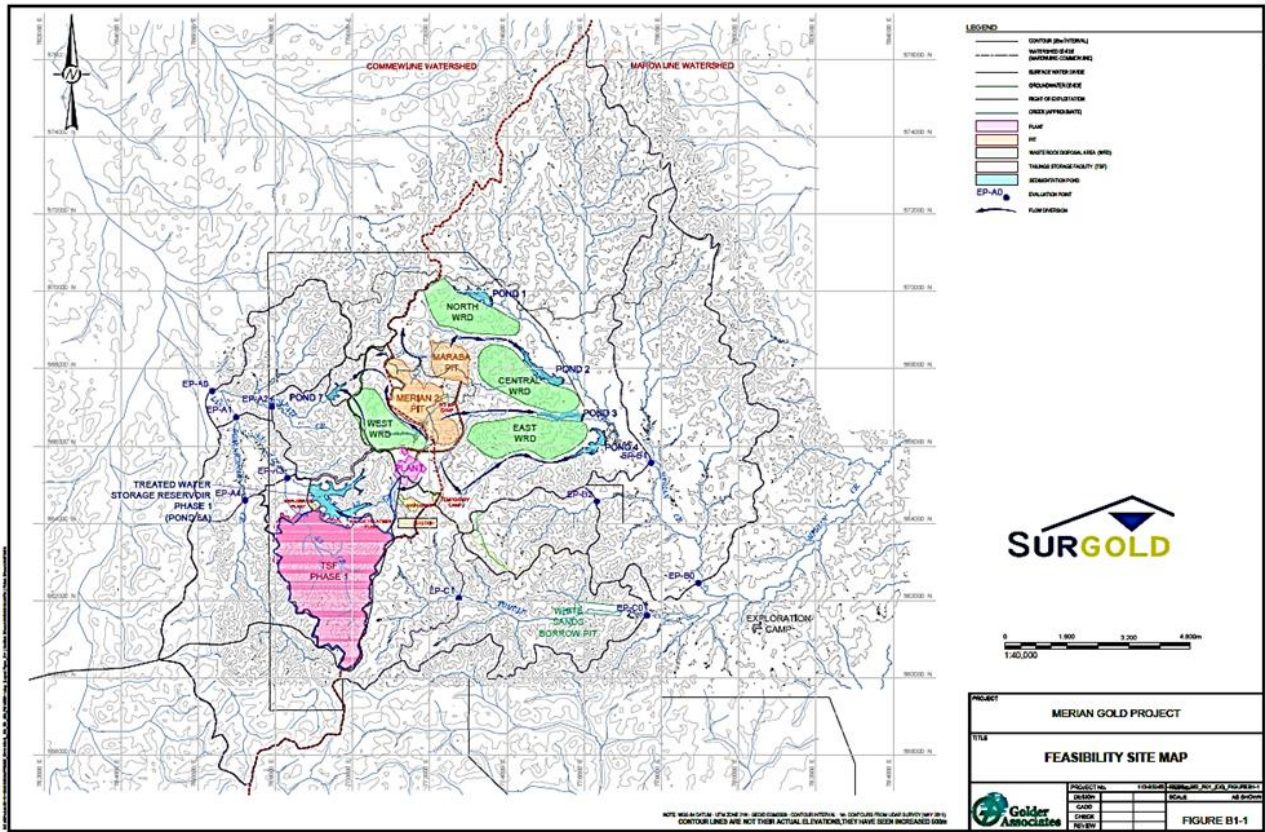
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Site Drainage Map

Merian

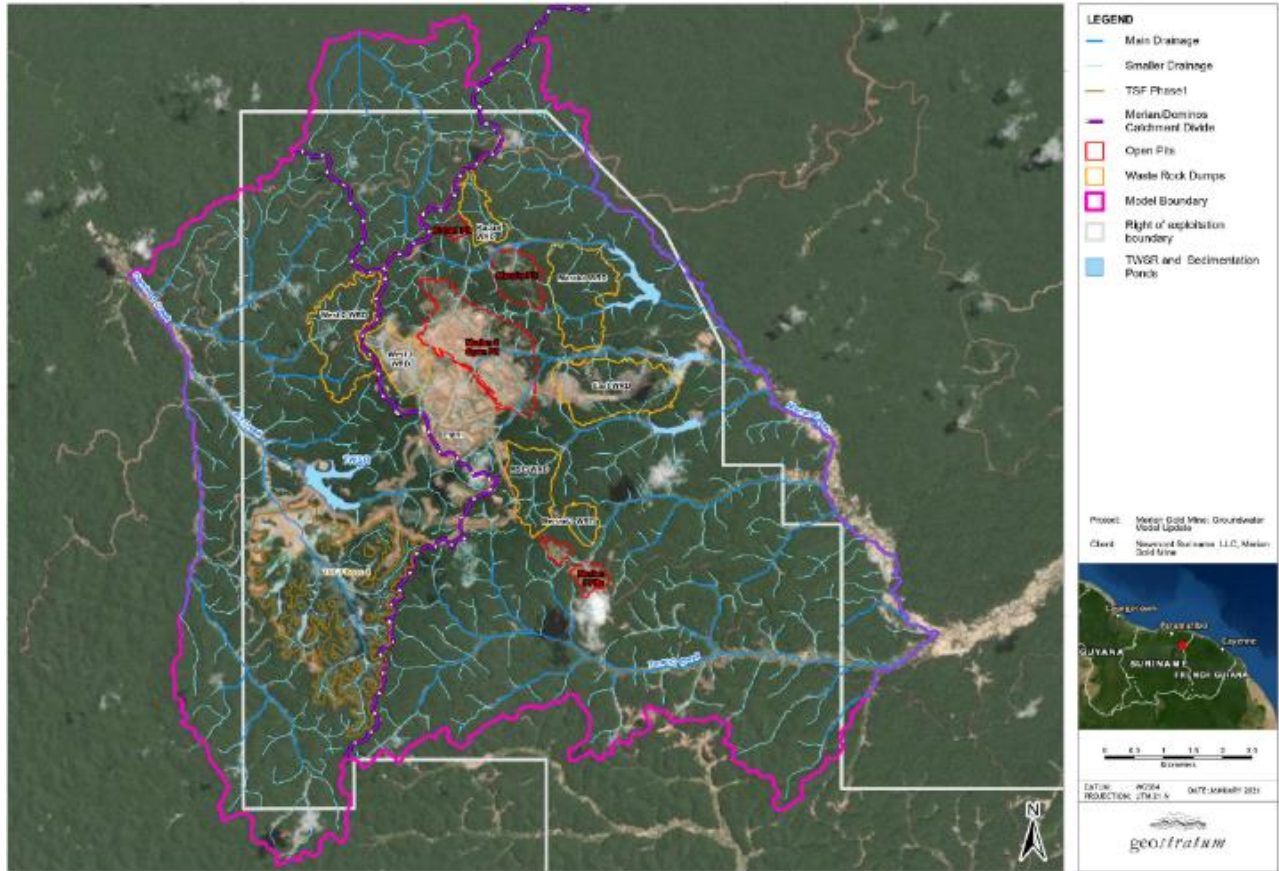
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## Ground Water Model Update

Merian

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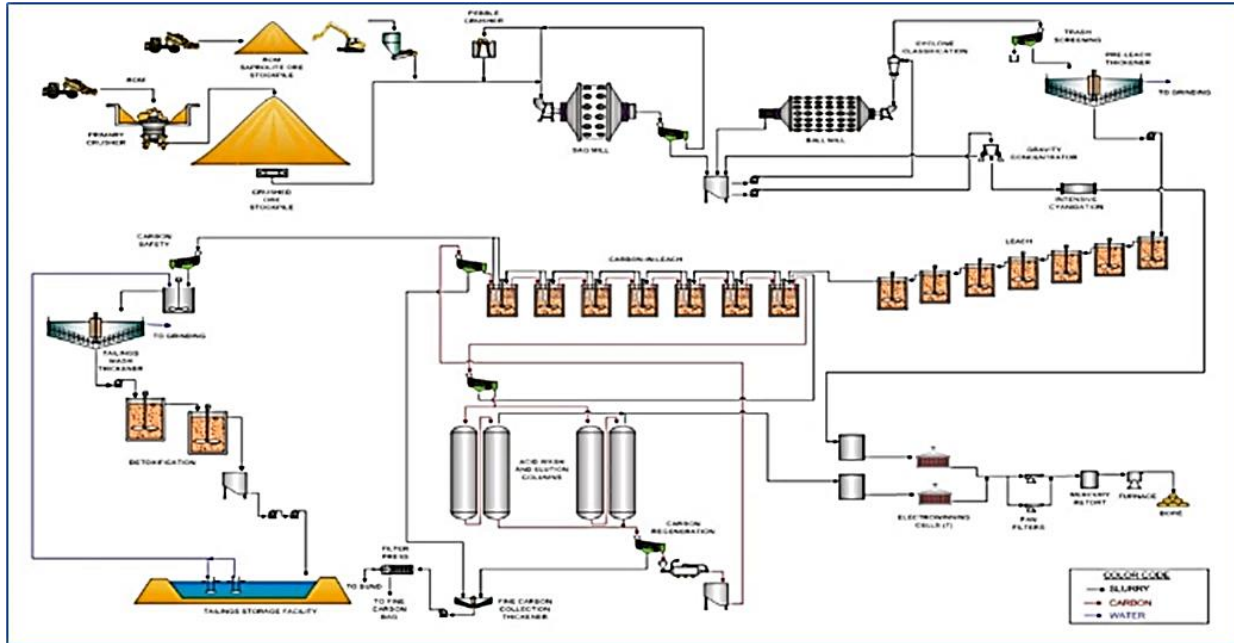
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Merian operations and Process Plant is displayed in a schematic



Processes at Merian includes the following steps:

### ***Mining - Ore from pit to stockpile***

The saprolite ore is mined by excavator and loaded into haul trucks for transport to the stockpile at the Process Plant. Hard rock is transported to the primary crusher and stacked at the crusher stockpile.

### ***Stockpile to Semi-Autogenous Grinding (SAG) mill***

Saprolite ore is pushed to the excavator by D10 dozers, the excavator feeds the ore through a grizzly and into the feed chute. Saprolite and crushed ore stockpile material is delivered to the Mill Feed Conveyor which delivers the ore to the SAG Mill.

### ***SAG mill to cyclones or gravity***

The SAG mill is charged 5 to 10% with steel balls. Water and lime are added with the ore. The ore is reduced to a slurry and discharges onto a screen which separates oversize material and directs it to a pebble crusher. The finer material passes through the screen and is largely pumped to the cyclone cluster. Approximately 25% to 30% of the material in the SAG discharge cyclone feed pump box is pumped through the gravity circuit for the processing of gold particles.

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### ***Ball mill to pre-leach thickener***

The coarse slurry from the SAG mill is pumped by the cyclone feed pump to the cyclones which classify or “separate” fines of a specific size. The cyclone overflow (fine slurry) is screened of any wood and trash before entering the pre-leach thickener. The cyclone underflow (coarse slurry) is returned to the ball mill for regrinding.

### ***Pre-leach thickener***

Water overflowing from the pre-leach thickener is re-used in the grinding circuit. Thickened slurry reports to the bottom (cone) of the pre-leach thickener and is pumped to leach tank #1. Cyanide solution and oxygen is added to the leach tanks. Lime is also added for pH control. Soluble gold cyanide complex contacts activated carbon in the 7 Carbon In Leach (CIL) tanks and adsorbs to the carbon. The carbon is retained within the CIL tanks by screens and moved forward from tank to tank as it becomes loaded with gold while the ore slurry flows through the CIL tanks.

### ***Detoxify and pump to tailings storage facility***

Slurry from the CIL circuit is thickened in the tailings thickener. The thickened solids are reacted with copper sulfate (CuSO<sub>4</sub>) to destroy any remaining cyanide using the INCO process of cyanide destruction. The detoxified slurry is pumped to the tailings storage facility (TSF). Slurry solids settle in the TSF and solids-free water reports as a decant. Water is recovered from the TSF and recycled to the Process Plant for re-use.

### ***Acid wash, Elution and Regeneration***

Loaded carbon is pumped over a screen and directed into the acid wash column where is soaked dilute hydrochloric acid to remove inorganic salt buildup then transferred to the elution column.

Carbon is treated at high temperature and pressure with cyanide and sodium hydroxide to desorb the gold into a concentrated solution. The concentrated gold solution is pumped to the gold room and the barren carbon is pumped to the regeneration kiln where it is heated in the presence of steam to remove organic contaminants and regenerate it so that it can be reused to capture gold in the CIL tanks.

### ***Electro winning and smelting***

The concentrated gold solution is electrolytically plated onto cathodes. Cathodes are washed and the gold sludge material collected, filtered and dried in a mercury retort oven. The dry oven solids are mixed with flux and melted in a furnace. Molten gold is poured into impure dore bars. The dore bars are shipped offsite to a refinery

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## Auditor's Finding

This operation is

- in full compliance with with the International Cyanide Management Code
- in substantial compliance with
- not in compliance with

This operation has maintained full compliance with the International Cyanide Management Code throughout the previous three-year audit cycle. During the recertification period the mine has not reported any significant cyanide related incident.

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.

Audit Company:	BP Cyanide Auditors S.A.C.
Lead and Technical Auditor:	Bruno Pizzorni E-mail: bpizzorni@cyanideauditor.com
Dates of Audit:	November 17 to 21, 2020

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# SUMMARY AUDIT REPORT

## Verification Protocol

### 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.*

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

Newmont Merian has a current agreement with Cyanco to purchase solid sodium cyanide for the Merian Mine. The agreement requires the cyanide purchaser to be certified with the Cyanide Code.

Cyanco's Houston Production Plant is certified as being in full compliance with the Code. Cyanco was last ICMI (International Cyanide Management Institute) certified in February 27, 2020. Cyanide is purchased directly from Cyanco, the cyanide manufacturer.

During the recertification period there was an exception where the mine had to buy non certified cyanide. As consequence of a disruption in the supply of sodium cyanide from the certified producer, an alternate temporary supply was arranged between Merian and a gold mine in Suriname to purchase 160 metric tons (Mt) of bulk sodium cyanide (NaCN) for the Merian mine site to mitigate the possibility of the mine operation interruption.

The disruption of NaCN supply to the mine site was reported to the ICMI explaining it was due to forces beyond the mine control.

Cyanide is purchased directly from the cyanide manufacturer, not from an independent distributor.

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## 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.*

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

Merian has written agreements with Cyanco and the cyanide transporters, designating responsibilities for cyanide management in the supply chain. This agreement designates responsibilities for cyanide management in the supply chain. Cyanco is responsible for delivering sodium cyanide product from the point of origin Houston Texas (TX), to the Port of Houston. InterMarine, Traymore and Haukes Transportation provide product transport services from the Port of Houston to the Merian mine site. Cyanco, InterMarine, Traymore and Haukes have developed emergency response plans for their respective 'chain of custody' areas as it relates to transport of cyanide product to Merian mine site. Consideration has been given to transportation routes and response capabilities along the way.

A convoy is used to road transport cyanide product from the Port of Moengo to the Merian mine site. A lead vehicle, mechanics vehicle and emergency response vehicle comprise the convoy consisting of no more than 5 product transport trucks. Merian personnel organize the off-loading of the product once the transport convoy has reached the mine site. Convoy personnel are required to participate in Merian site induction training to familiarize themselves with site protocols.

Merian directly contracts the cyanide transporters from the Houston port to Merian mine site. The auditor reviewed the transport contracts to ensure they covered the recertification period and that they were current in occasion of the audit, finding all in conformity.

The written agreements designate responsibilities, as applicable, for packing, labeling, addition of colorant, storage prior to shipment, interim loading, storage and unloading during shipment, evaluation and selection of routes, including community involvement, transport to the operation, unloading at the operation, safety and maintenance of the means of transportation throughout transport, task safety training and security for transporters and handlers throughout transport, and emergency response throughout transport

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Although no subcontractors are involved in contract holders of the Merian's cyanide supply chain, the agreements specify that the designated responsibilities extend to any subcontractor. Each entity involved in the cyanide transport operation whether by sea, in port or during land transport is operated directly by the contract holder.

### *Standard of Practice 2.2*

*Require that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management.*

The operation is  in full compliance with Standard of Practice 2.2  
 in substantial compliance with  
 not in compliance with

All agreements reviewed between Merian mine and the cyanide transporters require the transporter to be certified under the Cyanide Code.

During the audit, it was verified through the ICMI's website, that all cyanide transporters involved in Merian's cyanide supply chain were currently Code certified companies: Cyanco Global Ocean Supply Chain transport segment between Cyanco Houston production center to port of Houston; Industrial Maritime Carriers LLC (IMC), the sea transporter from Houston port to Moengo port at Suriname; Traymore N.V.VSH Transport at Port of Moengo (VSH), the stevedore company responsible for offloading the cyanide from a ship to the land transporter; and Haukes trucking company, responsible for cyanide transportation from the port of Moengo to the mine site.

Merian maintains records of the chain of custody documents from the producer, the maritime transporter and land transporters that handle the cyanide brought to its site. All parties are identified in the supply chain and correspond to transporters certified in compliance with the Code.

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### 3. HANDLING AND STORAGE

*Protect communities and the environment during cyanide.*

#### *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 Standard of Practice 3.1  
 in substantial compliance with  
 not in compliance with

Merian has a cyanide mixing area that is designed to operate with isotanks through a sparge process and for Intermediate Bulk Containers (IBC) by mean of a hoist and a hopper to prepare the cyanide solutions. All unloading, mixing and storage facilities for reagent cyanide have been professionally designed and constructed, as concluded a report of an evaluation of these facilities by Cyanco representatives, the cyanide producer. The mixing facilities reviewed by Cyanco were found in accordance with sound and accepted engineering practices. The design drawings of the cyanide preparation and cyanide distribution systems in the reagent area are properly stamped by a certified professional engineer.

In occasion of this audit, Merian was only storing and mixing solid sodium cyanide in isotanks. Isotanks are stored in the Process Plant in an open yard at the reagent area. No cyanide in IBC was stored in the mine site in occasion of the audit. During the recertification period the mine purchased 160 MT of sodium cyanide in Intermediate Bulk Containers (IBC) due to shortage contingency as explained in Standard of Practice 1.1. All cyanide in IBCs were already used in the process months ago.

The storage area for sodium cyanide isotanks is located within the Process Plant area. The open yard where cyanide is stored, is away from places where people regularly meet, as offices, maintenance shops, dining room or bathrooms. The plant is 16 km away from the communities.

Also, there are no open waters near the Process Plant platform, minimizing in this way the potential for releases to surface water and human exposure. The drainage system from the plant area directs all meteoric water to the mill event pond, where it is collected and pumped back to the mill. This mill event pond represents an additional contingency measure in addition to the existing secondary containment systems of the Process Plant facilities. In case cyanide solution overflows outside of the plant containment system due to an upset condition, it would be captured at the mill event pond.

Merian does not receive liquid cyanide.

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To prevent the overfilling of cyanide storage tanks and cyanide mixing and storage at the reagent area at Merian, there are level sensors.. These levels are continuously monitored in the plant control room. Both systems for cyanide preparations (isotanks sparging and with IBC system) share the same tanks. The sensors connected to plant control room system trigger the Hi-Hi level alarm at 90% for both the cyanide mixing and cyanide storage tanks. The cyanide level in the storage tank must be at 80% full or less before receiving more cyanide. The auditor reviewed in the screens of the Process Plant control room how the operator monitors the level controls and that these were functioning on these tanks.

Process tanks, including mixing and storage tanks, are built over reinforced concrete foundations, which prevents any seepage from the tank bottoms from entering the ground. Cyanide mixing and storage tanks are located inside concrete secondary containments systems. The operation performs routine testing and maintenance of the tank level instrumentation and alarm systems to ensure that they are functioning properly. The auditor observed that all of these concrete foundations and containment systems were in good condition.

The entire process area is contained within a concrete pad surrounded by curbs and walls, providing a competent barrier to seepage. The concrete floor is sloped to drain to concrete trench drains, where any spills or rainwater will be pumped back to the process.

The secondary containment concrete slabs and walls are covered with epoxy painting, material that improve impermeability to the containment system. Sealing material has been used for joints and small cracks on the concrete slabs. The secondary containment systems are inspected twice a day as part of the process facilities inspection system. The auditor observed that the concrete containment systems were in good condition at the time of the audit.

The cyanide mixing and storage tanks, are at an outdoor area within the Process Plant facilities. These tanks are provided with adequate ventilation to prevent the build-up of hydrogen cyanide gas and located separately, with appropriate barriers and secondary containment as necessary, to prevent mixing with incompatible materials. . As such, provides adequate ventilation and build-up of hydrogen cyanide gas is unlikely to occur. In occasion of the audit, no cyanide in IBC was stored at the mine site.

Impermeability of the cyanide storage is guaranteed as being stored in isotank, which technical specifications state is an impermeable and safe container to avoid contact of water with the product. They are stored in an open yard platform provided with the appropriate level and slope to avoid inundation of the area due to run off water from rain or any other source.

The solid cyanide storage area is located within the plant area, which is a properly secured fenced facility and has a security checkpoint to access the area. In addition, the cyanide solution mixing and storage tanks, are located withing a locked fenced perimeter where only authorized person are allowed to enter.

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The cyanide storage area is a dedicated area within the plant and separated from storage of incompatible materials such as acids, strong oxidizers and explosives and all other materials. The isotanks impermeability prevents any possible lixiviate from it or from other storage in the surroundings to get in contact. By other side, the slopes the platform at the storage area are conformed in such way that will not allow any mixing of materials.

### *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 Standard of Practice 3.2  
 in substantial compliance with  
 not in compliance with

Merian uses cyanide from isocontainers, but during the recertification period the mine purchased 160 MT of sodium cyanide in Intermediate Bulk Containers (IBC) due to shortage contingency. All cyanide in IBCs were already used in the process months ago.

Isotanks are reusable containers, the only use in its lifetime will be holding sodium cyanide.

Once empty, the isotanks are rinsed following Standard Task Procedure (STP) procedure related to cyanide sparging, prior to removal from mixing area. Isotanks are visually inspected on the inside, as there is no scale on site to weigh the empty isotanks and ensure that all cyanide has been dissolved and that they are empty. Isotanks are also rinsed on the outside and allowed to drain completely inside bunded area. Isotanks are returned to the storage area, labelled accordingly and then they are removed from site and shipped back to the vendor with the clean certificates.

Empty isotanks are rinsed three times according to the STP, prior to removal from mixing area. Rinsed isotanks get a cleaning to certificate completed by the supervisor and signed by the general foreman. The rinse water is returned the process.

The STP Cyanide Sparging Pre Fill Mix Tank and Cyanide Sparging outline the requirements for inspection, observation and mixing of cyanide. These procedures include instructions for the prefill cyanide sparge mixing tank with reclaim water and caustic solution prior to delivery and sparging of dry cyanide from ISO container; as well as instructions for 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.

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The STP Sparge ISO Container Change out – Mobile Crane has specific instructions that addresses the safe transport of the isocontainers, to avoid damaging or puncturing it, from the storage area to the mixing zone until its removal back to the storage area. This procedure requires the use of barricades and tags to isolate the area during the activity.

The cyanide isotanks are not stacked one over the other, they are stored at the floor level.

According to the STP Procedure Housekeeping Cyanide Storage and Mix Area (STP040), any spill during cyanide mixing activities, must be timely cleaned up. Any liquid spills or leaks within the concrete containments are washed to the sump pit and pumped back into the process circuit. During the walkthrough at the mixing area, it was observed all very clean which indicated excellent housekeeping practices.

Procedure Cyanide Sparging requires personnel during mixing to wear PPE including chemical suit, full-face mask and cartridge suitable for HCN, hardhat, rubber boots, chemical gloves and a personnel HCN gas detector. The STP Buddy System is applicable to all situations where work may be carried out in potentially hazardous circumstances, including cyanide mixing. A cyanide-sparging operation was observed during the audit. The review indicated that Merian has developed an appropriate checklist, defined the safe tasks, and appropriate observation to safely complete and document all mixing events.

Cyanco's solid sodium cyanide in isotanks comes with the colorant incorporated, in such way once that cyanide solution is colored during the cyanide-sparging process. Interviews with plant operators confirmed that high concentrations of cyanide solutions area color red.

For the occasion when Merian received 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. These wooden boxes were stored in locked sea containers within the plant area. Merian has written procedures for manual mixing (STP036 Manual Cyanide mix procedure) as well as for disposal of cyanide boxes and bags (STP334 Disposal (Burning) of Cyanide boxes).

Empty cyanide boxes and super-sacks (bags) are stored in a sea container. Once the sea container is full of empty boxes, it is transported to a dedicated location close to the TSF area where the boxes are burned following procedure STP334. The site has a permit to burn these boxes. Burning frequency varies depending on cyanide boxes usage. There were no empty boxes to inspect during the audit. During the audit no cyanide boxes were at the operation.

Merian procedure STP036 Manual Cyanide Mix indicate that cyanide bags are triple rinsed (the wooden boxes are not) in the cyanide mixing area. All boxes and bags are burned afterwards.

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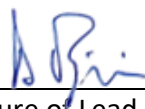
The dismantled cyanide boxes and rinsed bags are ultimately burned on site according to procedure STP334.

Merian does not return any cyanide boxes and bags to the vendor. However, the sea containers that contained the cyanide boxes are washed in the mill drive sump prior to sending them offsite.

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# SUMMARY AUDIT REPORT

## 4. OPERATIONS

***Protect communities and the environment during cyanide transport.***

### *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 Standard of Practice 4.1  
 in substantial compliance with  
 not in compliance with

Merian has developed a management system in alignment with ICMI standards and other best practices. This system requires operations to identify key risks, develop Standard Operating Procedures (SOP) and provide task & safety training to employees to ensure they carry out their tasks in a safe manner while monitoring and evaluating effectiveness of programs for continuous improvement.

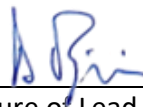
Merian has also developed a series of Standard Task Procedures (STP) that explains those activities required to operate the process plant and ancillary facilities. These procedures are documented, controlled and kept current on the company intranet site and are readily retrievable if required by personnel. Personnel are trained on these procedures using experienced supervisory staff and qualified training personnel from the Learning and Development Department.

Documentation and training is organized by section (circuit) of the plant and its associated facilities. These include crushing, grinding, gravity, leach, CIL, elution, refinery, CN detoxification, reagents, TSF, metallurgy utility services and maintenance. Procedures were reviewed and were found to be sufficiently detailed to enable safe operation.

Plant procedures have been developed and continuously updated for continuous improvement using the original Plant Design Criteria. These design criteria were based upon Newmont Corporate, regulator and other requirements. Critical design parameters are referenced in the original design criteria as well as in various management plans, standard operating procedures, and standard task procedures. Critical parameters include:

- The design or required freeboard for the TSF with 3rd party support to develop the probabilistic water balance and evaluate extreme rainfall events;
- The concentration of Weak Acid Dissociable (WAD) CN in tailings spigot discharges.
- Reliability and availability of the CN detoxification system.
- The design storm events for containments and impoundments.

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- Safety and emergency requirements.

Merian has developed the document Cyanide Control Philosophy which includes design criteria for cyanide additions in the process, the operation of the cyanide detoxification process (including density of solids, pH, Cu concentration and dissolved oxygen), and the final tailings Weak Acid Dissociate (WAD) cyanide discharge, which should be less than 0.5 ppm. Operations aim to target < 0.2 ppm to assure compliance with the 0.5 ppm WAD cyanide target in the event of cyanide destruct circuit upsets. This document also includes a decision tree on how to take action in case cyanide increments above the design criteria level.

Merian has developed and implemented work procedures for cyanide related tasks, which describe the standard practices necessary for the safe and environmentally sound operation of the cyanide facilities. The operation has identified equipment, personnel, and procedures for cyanide unloading and mixing activities as well as for storage facilities, the Process Plant, tailings pond and all associated piping and pumps as having contact with cyanide.

Merian has a database for work procedures related to cyanide management. These procedures address environmental, safety, operational controls, inspection requirements and preventative and corrective maintenance aspects of the facilities. Procedures were available for both normal and upset or emergency operating conditions.

Merian has developed and implemented a change management to ensure that the relevant risks are captured, evaluated, controlled before changes to facilities, equipment, processes, and/or resources and equipment are implemented. The need for changes can be identified via inspections, corrective actions, audits, accident/incident reviews and employee inputs during pre-shift, safety and other meetings.

Merian has a management of change procedure (MOC) to record the changes for cyanide related facilities. This procedure includes the following sections: specification of the change, change impacts, risk assessment, stakeholder review and consultation, mitigation/implementation plans, change review and approvals. Work Instruction Communications (WIC) is used to communicate any operational changes.

Merian's change management system requires review and sign-off by health & safety (H&S) and environmental personnel depending on the risk determined for the change.

Merian has incorporated contingency procedures into various standard operating procedures and management plans at the operation. In addition to these operating procedures, contingencies are in place to help control the adverse effects from abnormal conditions.

Examples of upset conditions include upsets in water balance, leakages, and/or plant shutdowns. Contingency procedures for these types of conditions in critical areas are provided for in the following documents:

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- Tailings Storage Facility Management Plan
- Process Plant Shutdown Procedure
- Emergency Cyanide Spill Response Procedure
- Process Plant Emergency Management Plan

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.

The Process Plant Emergency Management Plan provides guidelines for the preparation, response and management of emergency events so that responsible persons are kept well informed and capable of responding to emergency events. This plan includes an organizational and procedural framework for the management of emergency events and the subsequent restart of activities at the Merian Processing Plant operations and associated facilities.

Protocols and procedures related to shutdown of cyanide facilities include the Process Plant, tailing line, effluent treatment plant. The operation's procedures for shutdown of cyanide facilities also account for when longer-term temporary closure or cessation of operations may be necessary. Procedures related to responses to contingency events include emergency cyanide spill response procedure, tailing line rupture, power after black out and environmental monitoring. In addition, the Cyanide Control Philosophy document includes a WAD CN response decision tree for cyanide concentration in the detox system so cyanide concentration design criteria is met.

Merian has a program to conduct inspections of cyanide facilities with frequencies that varies from daily, weekly, monthly, quarterly and annually. Inspections are conducted by personnel from different areas to the same facilities, which provide additional certainty that conditions that could generate impacts to health or the environment will be identified.

Daily inspections including pre-start checks are conducted for each shift on each circuit. A check list is used for area of the plant to prompt personnel during their inspections. These check lists include prompts for inspection of integrity of containment ideas, presence of solutions in containments, tanks inspections for corrosion or leakage, checking pipes, valves, pumps for leaks, checking for presence of cyanide salts or deterioration, safety and environmental spill ancillary equipment readiness and HCN concentration.

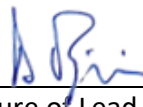
In addition to the shift inspections, a formal inspection program is in place to verify and evaluate performance across process facilities, including cross-functional participation from plant operations, metallurgy, maintenance, environmental, health & safety and security.

Maintenance inspections are carried out on a routine basis according to the scheduled preventative maintenance system. Work orders are generated by the maintenance system for the various plant

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facilities and equipment. Hazard identification procedures including but not limited to job hazard analyses (JHAs) are employed prior to any non-routine maintenance task.

Inspection findings are documented and retained by the Process Department. Corrective actions from the cross functional inspections and audits are documented in the corrective action tracking tool which helps to ensure the action is appropriately managed and completed by the responsible parties. Corrective actions from daily inspections and maintenance activities are recorded via a Work order to rectify the problem. Records of all maintenance activities are maintained for a period of not less than three years.

The inspection program was found to be sufficient to assure that the operation is safe and functioning within design parameters.

Operators inspect tanks holding cyanide at the beginning of their shifts (two shifts per day). These area visual inspections of the process facilities, including tanks for signs of corrosion, leakage and other potential issues. Inspections include the mixing and storage tanks, and tanks containing cyanide in the Process Plant. The reagents prestart checklist considers a dedicated section for cyanide facilities and includes inspection items such as storage tank level, general pump check, leaks, sumps, cracks in bund or unloading pad, valves, sparge line valves closed and locked and general housekeeping, among others. Other examples are the Leach and CIL prestart checklist, the thickeners and water systems pre-start checklist and the cyanide offloading checklist.

Secondary containments are also inspected at the beginning of the operators shift, looking for integrity, presence of fluids and available capacity, using the same inspection checklists for the prestart operations mentioned above.

Merian operations does not have heap leach operations. The drainage system from the plant area directs all meteoric water to the mill event pond, where it is collected and pumped back to the mill. The mill event pond receives material in the event of an unplanned process excursion or natural weather events, material from the tails lines, the reclaim water lines and any material that leaves the area of the process plant via collection ditches. In case cyanide solution overflows outside of the plant containment system due to a major upset condition, it would be captured at the mill event pond and pumped back to the mill. The mill event pond does not have a leak detection system.

Pipelines, pumps and valves are also inspected at the beginning of each shift, for deterioration or leakage. These inspection items are also included in the checklists mentioned above. The tailings pipeline is inspected twice a day through visual inspections. Inspections are recorded in a TSF log sheet that covers the tailings pipeline conditions.

The TSF is inspected twice a day, using the Tailing daily checklist, which includes the mill event pond level and conditions, the tailing pipeline, reclaim water pipeline, treatment water storage facility, embankments and wildlife occurrences. In addition, the environmental department takes daily water level measurements of water in the TSF for freeboard management. Samples of cyanide concentrations

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in the TSF are collected on a daily basis. Records of the inspections conducted by Merian to cyanide facilities, including routine inspections to physical integrity of surface water diversions required to maintain water balance, were reviewed by the auditor and were found to be complete.

Inspections and subsequent corrective actions identified are documented including the nature and date of the corrective actions. Daily and maintenance inspections are recorded on the inspection sheets and any follow up work requests are logged. Inspection sheets and work orders identify the name of the inspector, the date of the inspection and any identified items for corrective actions.

Corrective actions from cross-functional audits and inspections are logged in the site corrective action tool. Due dates and responsibilities for corrective actions are assigned dependent upon associated risk evaluations.

Records of inspections are retained, the auditor reviewed inspections records covering the recertification period from January 2018 to November 2020 and found to be in compliance as they include the date of the inspection and the name of the responsible of the field inspection. Included observations, comments and deficiencies found. If the deficiencies are related to maintenance of equipment or facilities, a work order is issues for action. All other issues that need to be actions are discussed on the Daily Safety and Production Reports, which includes a corrective actions list with due dates and completion dates. In addition, Process has a corrective action register that includes more details such as priorities, person responsible and status of corrective actions.

Merian has developed a system to manage all maintenance tasks including those identified during inspections. Planned maintenance schedules are generated in the SAP system which is then automatically issued at the prescribed date and/or frequency as a work order. Maintenance schedules are determined according to the level of risk associated with the equipment and/or manufacturer recommendations and specifications.

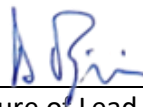
Pumps, pipelines, tanks, valves, sensors and safety equipment are all included under the preventative maintenance program. These equipment lists and preventive maintenance (PM) schedules are maintained in the system by process maintenance personnel and are updated as required due to plant changes, incident, audit and/or inspection findings. When determining PM frequency, consideration is given to the level of associated risk and the availability of spare and/or redundant equipment when determining the equipment category.

The corrective maintenance has weekly schedule. Required actions are identified through the Process inspection program, where a work order is issued and included in the maintenance weekly schedule. Work Procedures for cyanide equipment covering electrical, mechanical and instrumentation maintenance as well as the Workflow summary including identification / scoping / planning and scheduling of maintenance work were reviewed by the auditor.

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Merian has a 61 MW heavy fuel oil power plant and 4MW light fuel oil emergency backup diesel powered generators. A maintenance program is in place to maintain backup power availability in case of a power failure. The emergency generators are inspected and tested as part of the self-managed plant preventative maintenance program.

The mill control system has been setup to manage the power load for the plant facilities. Critical items such as tailings line pumps and safety lighting are given priority for emergency power in order to maintain the water balance and safe working conditions at the plant facilities.

Procedure Manage Emergency Power Load details the actions to be taken to ensure that critical equipment continues to operate and ensure environmental compliance as well as preventing operational / mechanical interruptions and failures.

Currently the power plant has 4 to 5 power engines (Wartsila generators) running providing around 26 MW. Heavy fuel oil reserves are for 15 to 20 days of operation. The power plant has its own maintenance personnel conformed by 6 technical among electricians and mechanicals.

Merian has implemented the written Black Start sequences that establish the standard procedures for the safe operation of the blackout start and perform black out start sequences in safe conditions. This procedure is always required when restoring power after a black out. In case of a total power failure, the blackout start unit can be used to provide power for the auxiliary equipment needed when starting one of the main engines. The power plant Superintendent indicated there was a blackout in 2019.

### *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 Standard of Practice 4.2  
 in substantial compliance with  
 not in compliance with

Merian conducts test work for NaCN addition rates no less than annually to optimize the use of cyanide in the gold recovery process. The cyanide addition strategy to the leaching circuit is based on the following two principles

- Maintain an optimum cyanide addition to minimize NaCN consumption while ensuring maximum gold recovery.
- Maintain the TSF spigot discharge WAD cyanide below 0.5 ppm

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The cyanide addition rate is determined according to internal and external test work performed by the metallurgical department in conjunction with the Newmont Technical Services Facility in Colorado. This test work analyzes representative ore samples of areas to be mined and processed in the following year and forecasts the cyanide consumption of different types of ore. This data is then used to optimize cyanide addition which takes into consideration the requirement to maintain TSF spigot discharge of less than 0.5 ppm WAD CN.

The results from the test work are compared against historical test work and if required the cyanide set point to the leach circuit will be adjusted to optimize cyanide use in processing activities.

The Cyanide Control Philosophy document has been designed for proper handling of the setting and control of cyanide addition rates, change management around modification of cyanide set points, the control of the detoxification circuit and procedure in case the cyanide detoxification circuit goes out of target parameters.

The STP Control of Plant Cyanide Addition is used to control cyanide addition to the process streams in the plant. Cyanide is added at the following locations: gravity circuit (Acacia solution tank), leach feed distribution box, leach tank #1 and elution circuit. The metallurgy team periodically performs bottle roll tests to optimize cyanide addition rates added into leach distribution box, which will feed either LT#1 or LT#2 (if LT#1 is offline) in the plant. There is an addition point in LT#3, however this is not currently used and is locked. In the event of an ore change or upset in the process, cyanide addition intervention may be necessary.

Cyanide control strategy is based upon a series of test work and the recommendation from the Chief Metallurgist, who will consider discharge cyanide concentration as the first priority in setting the cyanide addition rate. To assist with real time free cyanide control, the Merian leach circuit is equipped with two Cyanco —supplied free cyanide control analyzers (CCS panel mounted model).

In addition to the afore mentioned free cyanide control CCS analyzers, pulp samples are manually cut, filtered & titrated for free-cyanide every two hours from the cyclone overflow, leach tank N° 1 & N° 3 and analyzed in the Assay laboratory using the Flow Solution 3700 cyanide analyzer.

Based on the Merian TSF Liner Variance documentation, cyanide treatment prior to discharge will reduce weak acid dissociable (WAD) cyanide concentrations to between 1 and 5 milligrams per liter (mg/L). The process plant targets 0.5ppm for tailings post CN destruction.. Any changes to plant cyanide addition rates and/or operation of the CN detoxification circuit will have to ensure that this discharge limit is always maintained.

To monitor the effectiveness of the cyanide detoxification process a Cyanco supplied WAD cyanide control analyzer (Oxitrol panel mounted model) has been installed to monitor the WAD cyanide level of

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slurry feeding the cyanide detoxification process. The Oxitrol analyzer has a sample cycle time of 30-45 minutes.

Complementing the free cyanide and WAD cyanide control analyzers is a bench top, Flow Solution 3700 cyanide analyzer at the assay lab.

There are four methods used at Merian to control cyanide addition. The addition rate of the cyanide is controlled in order of preference by cascade, automatic, remote manual and local manual control. These controls are used to meet the Cyanide Control Philosophy, which describes the action to take when various scenarios occur. Merian has implemented a strategy to control its cyanide addition. Results from the daily cyanide concentration analyses are a continuous strategy to control cyanide addition. The results are reviewed and if changes are needed then they are communicated to the process operator.

### *Standard of Practice 4.3*

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

The operation is  in full compliance with Standard of Practice 4.3  
 in substantial compliance with  
 not in compliance with

Merian has developed a site wide probabilistic water balance using the Goldsim software. The site-water balance model is used to forecast water surplus/shortfalls depending on various modeled meteorological scenarios. The water balance contains, but is not limited to the following process operations elements: tailings deposition, process plant water balance, run-off from mining facilities (dumps, stockpiles), pit dewatering, Treated Water Storage Reservoir and Event Pond.

The water balance includes calculations for impacts from precipitation, seepage, and evaporation. The water balance draws on historical data taken from site rain gauges as well as from the Merian Meteorological monitoring locations to account for the seasonal variances in rainfall duration and intensity

The TSF decant water is used for mill make-up water and will, as required by the water balance, be pumped to the Effluent Treatment Plant (ETP) and subsequently to the Treated Water Storage Reservoir (TWSR) prior to discharge to the environment. Dependent on the season and the target water volume in the TSF tailings supernatant may be pumped to the ETP.

The Goldsim model is updated on a weekly basis and calibrated with on-site collected data. The model can be used for actual conditions (i.e., data to date), as well as annual, seasonal, and daily extremes

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and power outages, potential for overtopping of the tailings facility, such as use of forced lower evaporation and heavy precipitation. The Goldsim model also have the ability to select different extreme events scenarios, such as the 100-year, 24-hour event, on any day in the average- and wet-year scenarios. Therefore, the model does take into account the uncertainty and variability inherent in precipitation, specifically the extremes and variations.

The tailing deposition rate is considered as one of the factors of the Goldsim water balance model.

The TSF is being developed in phases. For each phase, the pond expansion allows sufficient tailings discharge capacity and containment of a 72-hour Probable Maximum Flood (PMF) precipitation event, plus an additional 1 meter of freeboard. The TSF does not have a spillway as it is not designed to overflow. In the case of the Mill Event Pond, the 100-yr/24-hr storm event of 247 mm of precipitation is used in the model.

The Goldsim model uses actual on-site precipitation and evaporation data since 2015 and from the Merian exploration camp since 2012. Evaporation data from external weather stations are also used to continue calibrating the model.

The Goldsim model uses runoff coefficients for different types of categories (i.e. jungle, harvested, cleared, excavated), which are then applied to the different catchments areas. It takes into account the amount of precipitation entering the Event Pond, Treated Water Storage Reservoir, containment areas and TSF directly and from surface run-on from the up-gradient watershed, including adjustments as necessary to account for differences in elevation and run-off coefficients.

Solution losses due to evaporation are considered in the model. Additional solution losses include discharges of treated water to the TWSR. The TSF is not lined and as part of the liner variance requirements an extensive seepage collection system has been installed and in the instance that non-conforming seepage is detected this can be pumped back to the TSF. Currently it is not necessary to pump seepage water back to the TSF since the seepage detection indicates conformance to quality requirements.

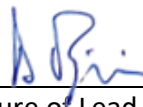
Power outages have been considered in the Goldsim model. For the TSF, the model includes scenarios where ETP discharges from the TSF to TWSR is unavailable due to prolonged power outages. In the case of the mill event pond, if water level needs to be maintained to avoid overflow but cannot be pumped down due to power outages, then diesel powered generator pumps would be placed to minimize overtopping and recover solution.

The Effluent Treatment Plant (ETP) treats water from the TSF and is designed to treat for metals, ammonia and cyanide prior to discharge to the TWSR. The treatment capacity of the ETP can vary from 600 m<sup>3</sup>/h to 1800 m<sup>3</sup>/h. Currently the cyanide treatment section of the ETP is not operational because of low cyanide concentrations in the TSF water entering the plant.

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The Goldsim model considers several key assumptions related to the management of the TSF reclaim pond that could affect the volume of water stored. The first assumption is that a minimum of 2 Mm<sup>3</sup> of water is stored in the TSF pond during operations. The second assumption made for modeling is that outflows from the TSF happen in the following order: i) Water is lost to evaporation, seepage, or entrained in tailings; and ii) The Plant takes water from the TSF pool based on required water content for processing. Water is sent to the ETP and TWSR before discharge to the environment. The model also assumes that groundwater and tailings seepage captured by the seepage collection and upstream drainage system is returned to the TSF pond.

The Water Balance is maintained and managed by the Mine Technical Services department area and updated as required due to changes to facilities and/or processes.

Routine monitoring of solution levels is conducted in the Event Pond, Treated Water Storage Reservoir and the TSF Decant pond. Plant operators are responsible for conducting shift water/solutions level checks in these areas. Weekly over-inspections are conducted by Process and Environmental personnel to confirm the daily field checks. Merian has a program to conduct inspections of cyanide facilities with frequencies that varies from daily, weekly, monthly, quarterly and annually.

The TSF, tailing pipeline and mill event pond are inspected twice a day by the Process department. Aspects related to water balance that are inspected include the mill event pond level and operation of pumps; as well as tailing level and operational freeboard in the TSF. Data collected is used to update and calibrates the water balance on a weekly basis.

The Environmental team monitors water levels and wildlife, records are registered electronically using the software Monitor Pro. TSF freeboard is monitored on a monthly basis and after any event of rain exceeding 30 mm, including the events pond. They check for erosion, sedimentation control, water levels. Records of these inspections were reviewed by the auditor, inspections are being performed by electronic means at field, using tablets and the software Monitor Pro. Inspections have been consistent during this recertification period.

The Geotech team monitors stability of TSF dams on a weekly basis and the causeway on a biweekly basis, and also the Mine Technical services department performs adhoc inspections at the TSF. Erosion and sediment control issues area logged on a separate document. There are also annual inspections by an independent technical contractor. By other side, there is a survey team in charge of measuring the ponds water levels at the TSF, including bathymetric works.

Operational procedures specify the minimum freeboard requirements for the TSF to prevent overflow during extreme weather events.

The Event Pond is designed with 75,000 m<sup>3</sup> emergency operating capacity and serves as a tertiary containment for the site. It can contain plant runoff from a 1: 100 year 24hour storm event without the

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need for pumping. This pond is operated to provide a centralized repository for site run —off, a plant makeup water source and minimize pumping around the site.

The TSF freeboard has been designed and approved by qualified engineers. The TSF, phase 1 , is designed to contain a 3 day probable maximum flood (1,300 mm of rainfall; equivalent to approximately 8.7 M m<sup>3</sup> of water) plus a freeboard of 1m. TSF solution is used for mill makeup water and may be pumped to the Effluent Treatment Plant and subsequently to the Treated Water Storage Reservoir. This is done as required to maintain decant water within desired operating levels.

In the case of the mill event pond, a 100-year/24-hour storm event will result in a pond elevation of 562.1 meters that allows 2m of freeboard below the top of the lined sliver fill and 5m below the spillway elevation. The mill event pond has enough storage capacity to hold up to 3.6 times the volume of the 100-year design storm events before the spillway is activated.

Merian has a number of programs in place to monitor and maintain the water balance. Precipitation data is collected via site based automated rain gauges. This data is then updated into the water balance model no less than annually for calibration. Process metallurgical staff compare updated meteorological data provided by the Mine Technical Services department against design assumptions and where necessary adjust effluent treatment plant operating practices. The Mine Technical Services department will have ultimate responsibility for the water balance updates and comparisons with design assumptions.

Data includes precipitation on a daily basis, measuring total rainfall as well as rainfall intensity. Data collected is used to compare the results to design assumptions and to calibrate the water balance model.

Merian has been comparing predictive vs. real data versus, the water balance model has indicated the design assumptions and data from operating practices show a high degree of coincidence. Current on-site measurements correlate well with the initial assumptions of the water balance. The water balance projections are revised as necessary based on actual data.

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### *Standard of Practice 4.4*

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

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

Merian's tailings storage facility spigot discharge WAD CN criteria is <5mg/L and target is 0.5 mg/L which is well below Cyanide Code Requirements and in line with site operating design criteria (TSF Liner Variance). This has been demonstrated to effectively protect against impacts to wildlife and other animals. Process operations are responsible for conducting daily inspections to monitor the TSF, and identify and report any possible cyanide related mortalities of birds or other animals.

The cyanide concentrations in the TSF decant pond are measured before discharge to the TWSR. WAD CN concentrations were reviewed by the auditor at the decant pond and values fluctuate between 0.2 mg/l and non-detectable (<0.02mg/l).

The process department samples the TSF reclaim water supply once per shift and the plant final tails pump box four times per shift to confirm that WAD cyanide concentrations at the TSF are maintained below 0.5 mg/l. CN data is stored in a database and reviewed by the process management team. Any incursions of the 0.5 mg/l WAD CN triggers a response to investigate and correct the upset with corrective actions implemented.

The Event pond is designed as a tertiary containment receiving excess spillage from the plant area. In the event that a release enters the Event pond, samples will be taken and if necessary it can be pumped back to the process. The free cyanide control analyzer is capable of measuring cyclone overflow and leach tank N° 1 & N° 3 leach solutions every 8 minutes for free cyanide concentration excursions. The manual readings are still taken when the CN analyzer is functional.

The tailings pond monitoring reports show cyanide concentrations well below 50 mg/l WAD cyanide. Verification was through review of water quality samples of the detox effluent prior to discharge into the tailings facility and from the TSF decant pond. WAD-CN measurements for the detox effluent are recorded in the site data base system Monitor Pro..

Operational checklists at the TSF require that routine checks are done for wildlife mortalities at the Tailings Storage Facility. In addition, any wildlife mortalities identified at any area of the mine are recorded as environmental accidents and investigations are conducted to ascertain the cause in accordance with reporting protocols.

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In the event that significant wildlife mortalities are encountered, a review of cyanide Management Practices will be undertaken to ensure protection of birds, livestock and wildlife.

The WAD CN values are well below the recommended value of 50 mg/l and the design criteria for water in the TSF is below 0.5 mg/l. Reported values in the TSF have been reported below 0.2 mg/l. Maintaining these WAD cyanide concentrations in open water at the tailings storage facility is effective in preventing significant wildlife mortality.

Regardless of that, the Process department conducts wildlife inspections twice a day and the Environmental department conducts inspections on a biweekly basis, registering any wildlife mortality or not. The Environmental department has a grid in the TSF area to identify and register presence of animals and, specifically, if any dead animals are found. The auditor reviewed the TSF wildlife monitoring registers covering the recertification period.

Merian 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 cyanide process solutions to surface water.*

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

Merian process operations are designed and operated to allow for discharges to surface water in such a way as to protect fish and wildlife from process solutions. The CN detoxification system aims to achieve a tailings box discharge of below 0.5 mg/l. Supernatant in the TSF is used for mill makeup water but can be pumped (seasonally) to the Water Treatment Plant to reduce solution volumes in the impoundment and eventually to the Treated Water Storage Reservoir before discharging offsite.

Merian has an Effluent Treatment Plant (ETP) that treats water from the TSF prior to discharge into the TWSR. The ETP with capacity to treat up to 1800 m<sup>3</sup>/h, is designed to treat suspended solids, metals, ammonia and cyanide. Reagents used in the ETP include ferric sulfate, lime, antifoam reagent, sulfide precipitating agent (not used at the moment) sulfuric acid (not used), caustic soda, flocculants and bacteria.

Samples are taken on a daily basis by Process and weekly by the Environmental department. WAD cyanide is analyzed on a weekly basis. The auditor reviewed the ETP discharge data. Parameters analyzed include pH, Total Dissolved Solids (TDS), Total Suspended Solids (TSS), metals, total, free and

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WAD cyanide. Values of WAD cyanide were below 0.2 mg/l, which conforms to the 0.5 mg/l WAD cyanide limit specified in the Code.

Newmont Merian process operations are designed and operated to achieve compliance with the 0.022 mg/l free cyanide at identified downstream compliance points denoted in the Environmental Monitoring and Management Plan. In the event that CN material is released from the plant containments or pipelines, it would ultimately enter the event pond or TSF. Depending on the location of a cyanide release, the event pond and other monitoring locations would be sampled as per the Environmental Emergency Monitoring Plan to assess any potential WAD CN concentrations prior to discharge of water.

The Effluent Treatment Plant (ETP) discharges water to Treated Water Storage Reservoir (TWSR) which acts as a mixing zone, before water being discharged downstream through a siphon into a perennial creek (A3 creek).

Monitoring station EP-A5 is the one closer to the discharge located in A3 creek. During the recertification period, all data reported free cyanide levels < 0.01 mg/l (non-detectable), which are below the recommended value of 0.022 mg/l. Cyanide values in water discharges from the TWSR are protective of aquatic life.

Merian TSF impoundment is an unlined facility but does have monitoring and pump back wells. Weekly TSF inspections and monitoring are conducted to identify any possible seepage from these facilities.

Routine environmental monitoring is conducted upstream and downstream of the mine site to identify any possible discharge from process facilities. Sampling points and locations are designated in the Environmental Monitoring and Management Plan in line with the regulatory requirements. The Environmental Monitoring and Management Plan is maintained by the Environmental Department.

Considering that the TSF does not have a synthetic liner, and the presence of quartz veins and saprolite in its foundation, the possibility of indirect discharges were taken into account during the design and construction of the TSF. The TSF currently has 6 seepage collection systems, one for each existing dam, to collect and intercept seepage coming from the facility. Both seepage drains and seepage wells form seepage collection systems. . Water from the seepage collection stopped pumping back into the TSF in 2019, due to the very high quality of the water collected.

Water samples have been collected during the recertification period from the 6 seepage systems and analyzed for cyanide species. Results from water analysis show WAD and free CN values < 0.01 mg/l (non-detectable). Data from all other seepage systems are also non-detectable for free and WAD CN.

In the event of indirect and/or unexpected discharges to surface water bodies, an Event Report must be completed and Rapid Response may be initiated.

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Remediation activities would be dependent on the concentration and location of the discharge. The CN Emergency Spill Response SOP details various response and remediation activities which would be supported by specialist advice and recommendations as required. Remediation activities will be carried out until WAD CN concentrations are below detectable limits. All cyanide related events are investigated and corrective and preventive measures developed, communicated and implemented to remediate any potential environmental, health, safety and community impacts. Final approval of remediation activities must come from the Environmental, Health & Safety and/or Process Manager.

### Standard of Practice 4.6

*Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of ground water.*

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

Groundwater in the region is designated as drinking water and as such Merian has put in place measures to protect human consumption beneficial use. Section 3.1 and 4.7 of the Cyanide Management Plan describe the measures that have been taken to minimize seepage to groundwater, such as concrete containment areas and proper management of tailings deposition and supernatant.

Monitoring points are located around the TSF to identify possible seepage which are monitored in accordance with the Environmental Monitoring and Management Plan. Also, any seepage escaping from the TSF via the embankments collects in drains located outside the facility and will be pumped back into the TSF. Samples are taken for monitoring and testing purposes by the Environmental department.

As part of the feasibility study and following extensive study and assessment of in-situ conditions at the Merian TSF site, it was determined to be unnecessary to control the risks of not installing synthetic lining within the facility. This research was completed by Golder Associates. The approved TSF Liner Variance Request Summary Report (2013) outlines the alternative risk mitigation methodology applied to the TSF at Merian.

The facility is bounded by earth dams constructed across valleys and created by the natural topography. As part of the TSF Liner Variance Request a seepage collection system for the TSF was required to collect and monitor potentially impacted groundwater seepage from the TSF. The system is designed and installed around the Main Dams in the valleys of the TSF perimeter boundary to create the impoundment for the TSF. The majority of the seepage from the TSF down-gradient of the

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embankments is collected and pumped back by the seepage collection system into the TSF. The overall TSF seepage collection system design includes seepage collection drains to intercept and collect seepage through the surface Saprolite layer beneath the main dams; a seepage collection wells; and groundwater monitoring wells.

A series of thirty two (32) seepage groundwater monitoring wells have been installed around the TSF to monitor impacts of the TSF. These wells are situated downstream of the TSF to monitor changes in the groundwater quality that might be as a result of seepage from the TSF. Environment department routinely samples these wells as per the Environmental Monitoring and Management Plan.

Merian uses international standards for cyanide concentrations in water (i.e. IFC water quality standards). For groundwater, Merian uses cyanide concentrations applicable to drinking water standards (0.05 mg/l WAD CN and 0.2 mg/l free CN for surface water, a standard of 0.5 mg/l WAD CN and 0.005 mg/l for free CN are used.

Compliance reports for groundwater and surface water were reviewed by the auditor. Data from seepage collection drains, seepage collection wells and compliance groundwater monitoring wells indicated no detection of WAD CN concentrations.

The TSF is located in the Tempati creek. Water (surface and groundwater) in the Tempati creek does not have a designated beneficial use.

Merian does not use mill tailings as underground backfill.

Merian Environmental personnel monitor groundwater for a variety of parameters including cyanide to protect human consumption use, which in Suriname is drinking water. In the event that seepage from cyanide facilities is shown to cause cyanide concentrations to rise above levels protective of beneficial use, an Event Report and Investigation must be completed.

All cyanide incidents are investigated and corrective and preventive measures developed, communicated and implemented to remediate any potential environmental, health, safety and community impacts. Final approval of remediation activities must come from the Environmental, Health & Safety and/or Process Manager and include ongoing monitoring/testing to confirm remediation activities are working satisfactorily.

Merian does not have seepage that has caused cyanide concentration of groundwater to rise about levels protective of beneficial use.

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### Standard of Practice 4.7

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

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

All tanks used for mixing, storing, and/or processing of cyanide and/or cyanide solutions are designed with secondary containment. Level indication, operator inspections, secondary containment and sump pumps help to prevent releases to the environment.

Merian purchases cyanide in isotanks which due to their construction characteristics and technical specifications provide a competent barrier for spill prevention. Isotanks are stored in an open yard inside the Process Plant, on a platform made up of compacted earth and provided with suitable slopes to collect any leached product or surface runoff.

The entire process area at Merian's Process Plant is contained within a concrete pad, including the mixing (isotank sparge area) and process solution tanks surrounded by curbs and walls, providing a competent barrier to seepage. The concrete floor is sloped to drain to concrete trench drains, where any spills or rainwater will be pumped back to the process.

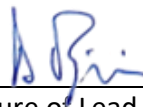
The secondary containment concrete slabs and walls have been painted with two coats of epoxy material that improve impermeability to the containment system. In addition, epoxy paint has been used for joints and small cracks on the concrete slabs. The secondary containment systems are inspected twice a day as part of the process facilities inspection system. The auditor observed that the concrete containment systems were in good condition at the time of the audit.

Process tanks, including mixing and storage tanks, are secured to solid, reinforced concrete foundations, which prevents any seepage from the tank bottoms from entering the ground. Cyanide mixing and storage tanks are located inside concrete secondary containment systems. The auditor observed that all of these concrete foundations and containment systems were in good condition.

The drainage system from the plant area directs all meteoric water to the mill event pond, where it is collected and pumped back to the mill. The mill event pond is lined with a geomembrane. The mill event pond receives material in the event of an unplanned process excursion or natural weather events. The event pond prevents release of process solution to the environment. It provides the last line of containment for capture and return of the loss back to the Process Plant. This may include material from the tails lines, the reclaim water lines and any material that leaves the area of the Process Plant via collection ditches. This mill event pond represents an additional contingency measure in addition to the existing secondary containment systems of the Process Plant facilities. In

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case cyanide solution overflows outside of the plant containment system due to a major upset condition, it would be captured at the mill event pond.

The causeways provide a corridor for the tailings pipeline from the plant site to the tailings storage facility (TSF) so the tailings can be pumped up to a highpoint between the north and south causeways and then gravity drain down to the TSF. In case of failure or rupture in the tailings pipeline, tailings and water spilled will flow into either the mill event pond, TSF or the TWSR.

All secondary containments at Merian are designed with adequate storage to contain at least 110% the capacity of the largest tank in the bunded area plus volume for the 1.25 year 24 hour storm event.

There are a total of 14 Leach-CIL tanks at Merian, with the largest tank having a live capacity of 5,450 m<sup>3</sup>. Each tank has been constructed on a concrete ring beam concrete cap to prevent seepage from the tank base.

All Leach & CIL tanks are contained within a concrete containment area which is graded to sump pumps which under normal operation pump contained spillages to the leach feed distribution box or, alternatively; to the final tails sump for rainwater management during a shutdown. The plant containment area is linked by weirs which have the capacity to ensure 110% containment of the contents of the largest tank in the interconnected containment.

The pre-leach thickener has a volume of 7,127 m<sup>3</sup>. The thickener is contained within a concrete bunded area, and is graded to a sump pump. Spillways link the thickener containment to the plant drainage channel and event pond should the thickener require dumping at a rate greater than can be accommodated by the sump pump. The total combined, linked pre-leach thickener, tailings wash thickener, leach-CIL tanks and CN detox containments is 17,876 m<sup>3</sup>.

Within the elution area, separate containment bunds complete with internal sump and pump exist for the starter eluate - barren tanks containment and the pregnant solution tanks containment.

The tailings line and TSF reclaim line runs along a causeway and drains by gravity from a high point to either the TSF or a concreted tailings dump basin which overflows to the event pond.

In the Process Plant, all tanks and cyanide facilities are located inside concrete secondary containment systems with dedicated pumps that remove solutions and return them into the process circuit. Although the whole plant has a secondary containment, any spillage outside of containment will ultimately report to the mill event pond. The procedure to manage water ponded in the mill event pond (Process Plant Mill Event Pond Management work procedure) includes management of pond levels and responses to level alarms to avoid overflow, inspections, audits, what to do in case of major process spillage out of containment that reports to the event pond.

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Procedure Clean Up Reagent Spill in Detox Bund describes the steps to be followed by the Detox operator to ensure a clean and safe Detox area. If there is a chemical spill in the Detox area, it must be dealt with as per the spill procedure for that particular chemical.

All cyanide process tanks at Merian have concrete secondary containment.

Merian employs a variety of spill prevention and containment measures for cyanide pipelines including secondary containments, routine inspections and preventative maintenance.

All cyanide process solution and slurry lines are contained within secondary containment including pipe-in-pipe, lined trenches, earthen berms and/or concrete bunding. Flange covers are also used to minimize the impacts from any spray that may occur on high risk pipelines.

Flow meters are provided on the tailings line with an alarm in the plant control room signaling flow disparity if measurements are outside of expected parameters. Additionally, the tailings line contains pressure sensing equipment to signal a change or a loss in line pressure.

Routine inspections are conducted on a per shift basis to identify and report any leaks and or damage to containment structures. These routine inspections are supported by scheduled preventative maintenance on spill prevention and leak detection equipment. Non-destructive testing is conducted by process maintenance personnel to check and monitor pipe wear at high risk areas.

The tailings pipeline does not have a lined trench along the full length of the pipeline; however, it has been designed in such a way to prevent uncontrolled releases to the environment in case of a failure or leakage. The tailings pipeline is located in a causeway, which provides a corridor from the plant site to the TSF so the tailings can be pumped up to a highpoint between the north and south causeways and then gravity drain down to the TSF. On the top of the causeways is an access road and pipe corridor which consists of high density polyethylene (HDPE) tailings distribution pipeline, tailings reclaim water pipeline, and freshwater pipeline which runs to the treated water storage reservoir (TWSR). The causeways were constructed of compacted fill.

The pipes on the North Causeway crest rest on a buried geomembrane that is sloped towards the mill event pond to ensure that any potential leakage from the pipes will be drain to and be contained in the mill event pond. The pipelines are contained on the South Causeway crest by a buried geomembrane channel that is graded towards the south end of the causeway. Any potential leakage from the South Causeway pipes will be contained in the channel and will drain into the TSF.

Tailings have low WAD CN strengths (current levels are below 0.2 mg/l WAD CN and by design should not exceed 0.5 mg/l WAD CN), the frequency of inspections of the tailings pipeline is twice per day, the pipelines are equipped with pressure sensors. In case of failure or leakage the tailing will flow either into the mill event pond, the TSF or the TWSR, which act as additional containment.

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Hazard and Operability (HAZOP) and other risk assessments have been conducted to identify special protection needs for areas susceptible to leaks which are located near storm water diversions. Process plant changes and continuous improvements are implemented based on these risk assessments and cyanide related incidents to protect against leaks and ensure that adequate protective measures are identified and in place for high risk areas.

There are surface water bodies close to the cyanide facilities, however, they drain into contained facilities (e.g. TSF, TWSR, mill event pond) that will help manage any contingencies. This minimizes the risk of potential impacts due to spillages of process solutions. The TWSR has a siphon for discharge that can be shutdown at any time. The TSF seepage collection drains work together with the seepage collection wells and have pump back stations into the TSF. Also, there are monitoring wells below the TSF that are monitored on a monthly basis.

Merian has specified that only HDPE (high density polyethylene), mild or stainless steel materials which are compatible with cyanide will be used to plant construction. The design criteria for the plant specifies the materials to be used as outlined in the QA/QC documents. In the event that changes to cyanide solution tanks or pipelines are required, a change management plan shall be followed to ensure that compatible materials are used for the installation works.

At Merian, all cyanide tanks and pipelines at the process plant and tailings pond are constructed with materials compatible with cyanide and high pH conditions. The pipes and tanks are made of carbon steel and stainless steel. The tailings pipeline is HDPE. Material specifications and construction material testing records for cyanide-containing equipment were reviewed and found in 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.*

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

Quality assurance and quality control (QA/QC) practices are in place for the construction and changes to Merian facilities including TSF, mill building, tanks, concrete containments, supports and piping at cyanide facilities. QA/QC is conducted in accordance with engineering standards in coordination with corporate and legal requirements.

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A QA/QC handover package is maintained at the site document control center and updates to facilities will be documented by the owner department as per Change Management Program requirements.

QA/QC programs have been implemented during the construction of cyanide facilities at Merian. QA/QC reports were reviewed during the initial Code certification audit and were found in compliance. In occasion of this recertification audit, the auditor confirmed records of the QA/QC programs are maintained in the Newmont's intranet and were available for review. QA/QC records for cyanide facilities are retained by Merian and were reviewed by the auditor in electronic versions. Buzzsaw is the document control records management systems used by Merian. There is a report issued by Afritech on QA/QC for the engineering and design of cyanide facilities for design of cyanide facilities to ensure that requirements of the Cyanide Code were included.

No new cyanide installations have been constructed or modifications made during this recertification period.

As part of the QA/QC programs for new construction and changes to installations, the compatibility and suitability of materials is considered to ensure that the design and implementation meets the intended requirements. A listing of material types to be used and minimum design/operating requirements is provided for within the QA/QC documentation with sign-off approvals from authorized personnel. The Process department is responsible for ensuring that the QA/QC programs at Merian address suitability of materials and third party review for the TSF.

Merian 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, subgrade and concrete testing and suitability of materials.

Records of QA/QC documentation are maintained by the document control center. Records are kept in hard and/or electronic copies. The document control center is responsible to ensure that adequate QA/QC records are provided and maintained for the life of the mine.

QA/QC records for the cyanide facilities were reviewed by the auditor in electronic versions. Buzzsaw is the document control records management systems used by Merian. In addition, hard copies of these records are kept in the document library at the Process Plant.

QA/QC records require sign-offs from appropriate personnel including qualified engineers and/or operations personnel attesting to the viability of the design, construction and as-built materials. These sign-offs and reviews are documented and maintained as part of the QA/QC documentation.

Qualified engineering companies performed the QA/QC inspections and reviews during construction of the cyanide installations at Merian and prepared the final construction reports certifying that the facilities were constructed in accordance with the design drawings and technical specifications.

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Records of construction reports, including as-built drawings, for the TSF, the Plant site, the Mill, the causeways, mill event pond were available for review and were found in compliance during the initial certification audit.

QA/QC records are to be maintained as part of the records retention policies including backup of files. As stated in the Cyanide Management Plan, if QA/QC records become unavailable for whatever reason, Merian will initiate a facility review by a qualified professional (i.e. professional engineer). The qualified professional shall provide a documented report outlining the suitability of the facility and operating practices along with any recommended actions and a time period in which the actions should be completed.

Merian has as-built drawings for all cyanide facilities including the TSF, the Plant site, the Mill, the causeways and the mill event pond. As-built drawings are properly stamped by a qualified engineer.

In the case of the cyanide mixing facilities, Merian requested the cyanide supplier, Cyanco, to conduct an evaluation of the facilities, as stated in the initial certification audit report. Cyanco conducted a site survey in early July and produced a report (July 19th, 2017) verifying that the facilities were constructed and are operated within established parameters to protect against cyanide exposures and releases.

### *Standard of Practice 4.9*

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

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

Merian Environmental and Process departments have developed a monitoring program and series of procedures which provide the framework for monitoring activities. These procedures cover the monitoring activities for the evaluation of possible effects from cyanide use on wildlife, surface water and ground water.

The site-wide Adaptive Water Management Plan and related Environmental Monitoring and Management Plan developed by Golder and Merian environmental personnel, includes all water monitoring activities for the site inclusive of cyanide facility monitoring such as the TSF, surface water, ground water, and other environmental monitoring activities. The plan is maintained by the Environmental department

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There are procedures for surface water quality sampling and groundwater quality sampling , standard work instructions for monitoring activities for both groundwater and surface water, as well as a Wildlife Monitoring procedure .

Additional documents reviewed by the auditor include the Environmental and Social Monitoring Plan 2020, Biodiversity Management and Action Plan and a monitoring schedule derived from the requirements of the adaptive water management plan.

Sampling protocols developed for the site have been developed, reviewed and implemented with input from qualified internal and external personnel. These protocols are based upon Newmont Corporate, regulatory, and other requirements with an aim to implementing international best practices. Included in these protocols is a plan for Emergency Sampling Procedures.

The protocols are supported by a variety of procedures maintained by the environmental and process departments to ensure that proper methods and chains of custody are allowed. Procedures for sampling are maintained by the Environmental department and Process metallurgy group.

Merian has a team dedicated to environmental monitoring and management as it relates to both routine and emergency sampling. This team consists of the Environmental Superintendent, Environmental representatives and Environmental Technicians. All final reviews and approvals of sampling plans and analytical protocols shall be done by qualified and authorized personnel with appropriate background and experience in sampling and analytical techniques.

The procedures for surface and groundwater sampling were developed by Surinamese consultants ESS Environmental Services and Support NV. Wildlife Monitoring procedure was developed by a US consultant, Mike Meyer, who is technically qualified for this type of work.

Biodiversity Action Plan was originally developed by Mike Meyer and revisions of this document, during the recertification period, have been completed by Melissa Graham – Merian Environmental Manager and Hedy Feen - Superintendent of Field Services of the Environmental area, both have university qualifications in environmental science.

Sampling and handling procedures are addressed in both the site Environmental Monitoring and Management Plan as well as the individual procedures. This includes requirements for sample locations, frequency, chain of custody documents, CN species analysis and analytical procedures.

CN species analysis marked on the chain of custody document dependent on the type of sample. Environmental monitoring team members including environmental sampling technicians are trained on these sampling & handling procedures.

Merian has the annual Environmental Monitoring Schedule, which includes activities for monitoring activities including groundwater, surface water, process solution and wildlife which includes type and location of sampling, frequency of samples, cyanide species to be analyzed. Monitoring weekly work

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plans are also developed that provide more detail on the activities to be conducted, including monitoring for CN species in mill event pond, TSF, surface waters and groundwater.

Procedures for surface and groundwater quality sampling describe how samples should be taken, field parameters to take, sample preservation, sample handling, shipping instructions, equipment calibration and quality control.

Documenting the field conditions during the time of sampling is done using the data base software MonitorPro (MPField). These forms are used to document possible situations and ambient conditions that may impact the analytical results for each sample. The data is stored in the database by the Environmental Department

Field forms are used for adhoc sampling. Merian monitoring reports 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).

The environmental team monitors for possible surface and groundwater discharges and associated impacts both upstream and downstream of the site. This is done as part of the routine monthly monitoring regime completed by the Environmental department in alignment with the Environmental Monitoring and Management Plan. Monitoring and compliance points have been established in accordance with regulatory requirements and are sampled on a regular basis according to the plan. This work is completed by the environmental team with monitoring records logged in the site environmental monitoring database.

Merian monitors cyanide species (WAD CN, Free CN, Total CN) for both surface water and groundwater stations located downgradient of the site.

In terms of discharges of process water, Merian has an Effluent Treatment Plant (ETP). Samples are taken on a daily basis by Process departments. WAD cyanide is analyzed on a weekly basis. The ETP discharge data were reviewed by the auditor. Parameters analyzed include pH, TDS, TSS, metals, total, free and WAD cyanide. Values of WAD cyanide were below 0.02 mg/l.

Merian operations maintain their WAD CN discharge to the TSF below 0.50 mg/L WAD CN. However, routine inspections and patrols are still carried out at process facilities including the TSF tailings dams to identify any possible wildlife mortalities associated with process solutions. A series of items are provided in these checklists to identify possible wildlife impacts.

Any and all wildlife mortalities are reported to the Environmental department, logged within the wildlife mortality registry and may be investigated to try and ascertain the cause of wildlife mortality.

The Process department conducts wildlife inspections twice a day and the Environmental department conducts inspections on a biweekly basis. The Environmental department has a grid in the TSF area to identify and register presence of animals and, specifically, if any dead animals are found. The inspection

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forms and the TSF wildlife monitoring register were reviewed by the auditor. Records showed that paper forms are filled out every day by the inspectors. The inspection records showed the name of the inspector, the date of the inspection, and the results of the inspection.

The monitoring frequencies at Merian are based upon established schedules and levels of risk. Routine daily inspections occur throughout the plant to identify any possible upset conditions which may require immediate and/or emergency monitoring outside of normal monitoring periods. The operation conducts monitoring at frequencies adequate to characterize the medium being monitored and to identify changes in a timely manner.

Monitoring frequencies are outlined in the Environmental Monitoring and Management plan and based upon industry best practices and/or regulatory requirements according to the table below.

Sampling Type	Frequency	Method
Surface Water	Weekly, Monthly	ENV monitoring
Ground Water	Monthly, Quarterly	ENV monitoring
Wildlife Mortalities	Daily	Process & surface support inspections.
Plant Final Tailings	4x per shift	Manual pulp sample cuts.

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### 5. DECOMMISSIONING

*Protect communities and the environment from cyanide*

#### *Standard of Practice 5.1*

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

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

Merian has developed a Closure and Reclamation Plan in accordance with the Newmont Corporate Closure and Reclamation Plan Templates (CRT) and as part of the Environmental and Social Impact Assessment (ESIA). Included in the CRT plans are decommissioning activities for cyanide facilities. This includes decontamination of equipment (tanks, pipelines, pumps, valves), planned drawdown and removal of residual cyanide reagents, water balance and quality control mechanisms, final deconstruction and disposal of cyanide facilities, and/or reclamation of facilities including tailings impoundments.

The Environmental Superintendent is accountable for maintaining this plan which is reviewed on an annual basis by both site, regional and/or Corporate personnel. Changes and revisions to the plans are made as required by changes in operating conditions, facilities, and legal requirements.

The document considers decommissioning strategies for the cyanide facilities and treatment systems which may be cyanide bearing, including the mills, pre-leach thickener, leach and 7 CIL tanks, tails thickener, elution and electro-winning, process water tank, Detox plant, tailings and reclaim pipelines, ETP, TSF, mill event pond, TSF seepage collection system.

The water in the TSF and TWSR will continuously be monitored for cyanide and other relevant parameters. When the concentration is below the acceptable standards, the water will be discharged into the environment.

A conceptual decommissioning schedule has been developed with tentative timeframes and activities associated with decommissioning activities. These activities are developed and updated in coordination with the CRT document as changes to the facilities and/or mine plan occur, changes and updates are made to the schedule to reflect any impacts including duration and sequencing. The

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Environmental Superintendent is accountable for maintaining this schedule in alignment with the closure Plan

The Plan includes an implementation schedule, which details activities to be conducted starting 2 years prior to closure and activities beyond the first year after closure is completed. The sequence of decommissioning activities is shown with reference to years prior and after closure, rather than calendar years.

CRT plans are reviewed on an annual basis. As part of this review, both site, regional and/or corporate personnel review and comment on the plans and the associated scheduling, procedures, and activities. This helps to ensure that the plan is continuously updated and accounts for changes in the mine lite planning and associated decommissioning costs, activities and responsibilities. This Plan is also included in the master document control schedule of the Environmental Department and indicates that it should be reviewed and updated.

### *Standard of Practice 5.2*

*Establish an assurance mechanism capable of fully funding cyanide related decommissioning activities..*

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

Corporate Closure and Reclamation Template (CRT) documents outline the cost for full implementation of the site-wide closure and reclamation plan for the current and planned facilities and activities, inclusive of cyanide facilities. Facility demolition is a percentage of the installation cost. Earth works are referenced on the mine fleet cost. These costs are reviewed on an annual basis and updates are made as required to cost estimates by the Environmental team.

Cost estimates for decommissioning activities are reviewed on an annual basis by the Environmental team. Newmont operations are required to estimate closure liabilities on an annual basis (i.e. Life of Mine and Financial Accounting Standards Board - LOM-FASB exercise). Updates to the plan are made to account for changes in plant layout, disturbance areas, cost variables, and resource availability.

The decommissioning and cyanide decontamination estimates provided were generated as a function of the full construction installation costs, which was completed by G-Mining and contractor labor. This is consistent with the methodology used at other ICMI certified Newmont sites, and represents a reliable estimation of third party decommissioning costs.

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In accordance with Section 19.4\_2 of the Mineral Agreement, Surgold provides the Republic of Suriname, on an annual basis, with: (a) a corporate guarantee of the Parent Company equal to eighty percent (80%) of the Calculated Reclamation Cost; and (b) the remaining twenty (20%) covered by a letter of credit, insurance policy, or surety bond issued by an A-rated or better financial institution, with the Republic of Suriname as the beneficiary.

The financial assurance amount is sufficient for the company to ensure its obligations to carry out reclamation of land disturbance in the course of its mining operations. The financial assurance includes those activities required for decommissioning of cyanide facilities for the current disturbance. Financial assurance requirements are reviewed no less than every three years and/or whenever significant changes occur to mine operations and the reclamation and decommissioning plans.

The Merian Environmental team in collaboration with the Newmont Corporate Treasury team maintains the financial assurance details on behalf of Newmont and the Merian site.

Merian has established a letter of credit from JP Morgan to the Suriname government. This letter of credit is provided under the commitments of the Mineral Agreement between Newmont and the Suriname government. This letter of credit was reviewed by the auditor and will be renewed every year.

Merian has established a letter of credit as the mechanism to cover the estimated costs for closure and reclamation.

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### 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 Standard of Practice 6.1  
 in substantial compliance with  
 not in compliance with

Merian has established a number of Standard Operating Procedures (SOPs) and Standard Task Procedures (STPs) for cyanide related work which helps to ensure that worker exposure to cyanide is minimized and/or controlled. STPs are provided in the site document control center. For more general activities which apply across various areas of the plant and/or the mine operation, work permit systems have been developed.

Process plant SOPs and STPs specific to various operating facilities and circuits are supported by specific training conducted by competent operators and/or designated Learning and Development (L&D) personnel and complemented by training modules.

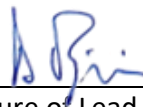
The procedures have been developed for the cyanide storage, preparation area, process areas at the plant and the detoxification circuit. They are detailed for the risks involved with each task (including preparation, plant operations, entry into confined spaces, and equipment decontamination) and adequately describe safe work practices.

The procedures detail task specific requirements, minimum training requirements to conduct the task, and procedures to follow in case of a contingency. Verification of the written procedures included review of the specific task, plans and worker interviews. Merian has developed approximately 100 procedures related to cyanide management. Procedures were reviewed and found to be sufficiently detailed to enable safe operation and to minimize worker exposure.

Merian STPs and permits provide line item listings of requisite personal protective equipment (PPE) to prevent and/or minimize worker exposure to cyanide and/or cyanide containing solution. In addition to these procedures, signage and task safety training is used to provide awareness to personnel of the requisite minimum PPE requirements for an area.

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During pre-start checks, operators are required to identify whether they have the requisite PPE to perform the task at hand and/or identify any upset conditions which may require additional precautionary measures. In situations where the task is non-routine, a Job Hazard Analysis (JHA) may be required to identify any risks associated with the work and ensure that adequate PPE is provided to complete the work safely.

All Merian work procedures require the use of personal protective equipment (PPE) and address work inspections for cyanide related tasks. Procedures may include work permits requirements, training pre-requisites and pre-task checklist, plan and prepare for the job, perform the job and job completion checks and/or inspections. In addition to the use of general PPE, such as hard-hat, steel toes shoes, and safety glasses throughout the production area, areas and/or tasks where personnel may come into contact with cyanide have additional PPE requirements.

In order to obtain a work permit in an area, a pre-work inspection must be completed. This process requires that 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. Maintenance personnel need to obtain a work permit prior to any activities in the process areas such as repairing a cyanide pump.

Merian has implemented a document control program which helps to ensure that only approved documents are used to manage and/or operate plant facilities and equipment. In addition, a Change Management Procedure is used to manage changes to facilities and ensure that these changes do not adversely impact on health and safety, the environment, or communities. The Change Management Plan template discussed in Standard of Practice 4.1 of this document includes a section on Health & Safety related risks and requires review and sign-off by Health & Safety personnel. Involvement and operational personnel helps to identify how changes to a facility or its operating practices may increase cyanide exposure risks and provides a chance to evaluate, address and implement effective change management.

Workers at the operation are given the opportunity to provide input to procedures via a variety of mechanisms including pre-shift meetings. Comments for improvement are directed to supervisors and/or management for consideration.

New and revised documents go through a review procedure which may include feedback from area operators with significant experience in that area. Comments are incorporated and then updated procedures are disseminated to the supervisors for review with the crew for final review and implementation.

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### *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.*

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

Merian has determined that the optimal pH control for process solutions is 10.5 to prevent the evolution of HCN gas and control adverse pulp viscosity effects on process metallurgy. To help control pH, caustic solution is used to dissolve solid sodium cyanide briquettes and lime slurry is used added to maintain pH in the grinding & leach circuits. pH probes in the grinding & leach circuit are used to monitor the pH of the pulp at the cyclone overflow and in the leach tanks pH controllers are used to adjust the lime feed so as to maintain optimal pH level control in the grinding and leach-CIL circuits. Mill control system alarms are activated in the control room when the pH drops below pH 10 so that the operator can be notified about the possible presence of elevated HCN gas levels whilst necessary corrective actions to increase lime feed are undertaken HCN monitors around the plant are calibrated to alert personnel to HCN gas in the area, visually and audible alarms alerting when it exceeds 4.7 ppm and above 10 ppm.

Portable pH probes are used to verify the accuracy of online pH probes which are routinely cleaned and calibrated on a pre-determined preventative maintenance schedule.

The Control Room continuously monitors the pH at the cyclone overflow, CIL tank #1 and the detox tank. The other pH readings are collected manually. The cyanide mix tank does not have a pH meter because there is a set volume of caustic and sodium cyanide sparged together every mix event that controls the pH value.

In collaboration with Occupational Health/Industrial Hygiene Programs, Merian has established a number of high risk areas where exposure to HCN gas may occur including areas within:

- Reagent Storage Building
- Sag Mill (x2)
- Cyclopack Area
- Pre-Leach Thickener
- Leach Tanks (x2)
- Tailing Wash Thickener Area
- CN Detox / Final Tailings Area
- -Elution Circuit Area
- Gold Room (x2)
- Cyanide Preparation/Distribution Area
- Cyanide Preparation and Distribution Sump Pump
- Gravity circuit (Acacia)

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Merian uses fixed and personal (portable) monitoring devices to confirm that controls are adequate to limit worker exposure to hydrogen cyanide. HCN alarms are set to visually alert operators at 4.7 ppm and 10 ppm. The alarm for 4.7 ppm activates a flashing strobe locally and an alarm shows in the control room on the mill control system alerting to possible high HCN gas in the area. At the activation of the alarm at 4.7 ppm, the workers must leave the area and when the levels are just below the alarm of 4.7 ppm, personal can return to the area if required. At 10 ppm, personnel must immediately leave the area until the area is safe to resume work and the alarm is reset.

Around 15 fixed HCN detectors are installed in these potentially high risk areas to alert personnel to possible HCN gas exposure. Alarm thresholds (4.7 ppm & 10 ppm) are hardcoded in the Programmable Logic Control (PLC). These alarm thresholds will trigger an alarm in the control room..

In addition to these alarms, Merian employs personal HCN monitors for operators in high risk areas. Personal HCN monitors have identical alarm thresholds as fixed HCN gas detectors. Operators and maintenance personnel were observed using these monitors throughout the audit.

Merian has established a number of high risk areas where exposure to HCN gas may occur according to the Code requirements, including areas within the pre-leach thickener, leach tanks, tailing wash thickener area, CN Detox / final tailings area. elution circuit area, gold room, cyanide preparation/distribution area, distribution sump pump and gravity circuit (Acacia), among others.

Signage, procedures and training developed by the process plant help to ensure that workers understand the high risk areas and the alarm responses requirements. Process plant personnel are responsible for ensuring that adequate levels of signage and alarms are maintained throughout the plant to protect against HCN exposures.

Workers are required to wear personal HCN monitors at the following areas: cyanide storage, cyanide sparge/mix, SAG discharge screen, gravity and cyclone, trash screens, leach tanks #1 and 2, carbon safety screen and upper levels of the detox area.

Work 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 entrances.

Fixed HCN detectors are tested and calibrated on a routine basis by process maintenance Electric and Instrumentation (E&I) personnel as per manufacturer recommendations. Records of these tests and calibration activities are recorded and maintained in the preventative maintenance system by process maintenance personnel.

Calibration is conducted on a monthly basis in accordance with manufacturer's instructions. The maintenance program automatically generates a work request. Currently Merian is using the computer program SAP to automatically generate the work request.

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Merian has around 114 personal handheld HCN monitors that are bumped weekly and calibrated monthly. Bump tests were reviewed for a monitor for the time period of the recertification audit. The alert to bump the meters is generated electronically by the HCN monitor.

Personal HCN monitors are issued to personnel working in high risk activities such as cyanide offloading and/or gold room personnel. Ownership of the personal HCN monitors and 'bump stations' is by the Process Safety Training group. Personal HCN monitors are released to process operations personnel by way of a registry. Records of maintenance activities are recorded and maintained by the Health & Safety department.

Signage is displayed at the plant entrance and throughout the various facilities including the tailings facility to alert personnel to the presence and/or possible presence of cyanide, access restrictions and the requisite PPE for the area. To support identification of pipeline contents, all pipe work in the plant labeled to identify the line, the contents and flow direction following ANSI standards.

In addition to identification of cyanide areas and PPE requirements, signage is also used to restrict eating, drinking, smoking and open flames to authorized areas only. These areas include process administration offices, mess hall, and other identified areas where potable water is stored in the facility.

Warning signs posted in the language of the workforce (English and Dutch). Verification was through visual inspection of the signs located in areas where cyanide solution is prepared and used. These areas included cyanide storage, sparging/mix, process plant areas and detox circuit.

High strength cyanide solution is dyed in red color for clear identification. Dye is sent with the cyanide briquettes inside the isotanks so that at the sparging operation, the high strength cyanide solution results colored in red.

The Merian processing plant is equipped with a number of fixed and portable safety showers/eyewashes to provide emergency rinsing in the event of chemical exposure, installed at strategic locations throughout the operation in all areas where there is a potential for exposure to cyanide. Safety showers and eyewashes are checked as part of daily inspection checklists to ensure that they are operational and that water streams and flows are adequate. This process of testing the shower and eye-wash station prior to commencing work was observed during the audit. The auditors randomly checked showers and eyewashes during the site tour to verify functionality. In addition to the daily checks, routine preventative maintenance on the showers is completed by the process maintenance personnel no less than quarterly.

To protect against fire, dry chemical powder fire extinguishers are used in the plant to prevent generation of HCN gas whilst extinguishing a fire. These extinguishers are checked as part of the daily inspections by the area operators. In addition, the Health & Safety team is responsible for routine inspections and replacement of undercharged or faulty extinguishers. The auditors randomly checked fire extinguishers to confirm they are the acceptable type for use with cyanide. Verification was conducted by reviewing Merian's inspection and testing records for showers, eye wash stations and fire extinguishers and records

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of annual fire extinguishers inspections and maintenance. Fire extinguishers are also inspected and tested on a monthly basis by an external contractor.

Pipelines and tanks that contain cyanide or cyanide solution are labeled to enable plant personnel to identify the contents. Labeling is typically done at a spacing of no greater than 6 m to allow personnel to easily identify and track the lines to identify contents.

For pipelines, flow direction arrows for cyanide bearing lines are used to allow personnel to understand the flow and possible exposures and/or response requirements for leaks and/or maintenance work.

Color coding is also used to identify tanks and process solution pipelines. These color codes are done in accordance with ANSI standards. To support identification of pipelines, personnel participate in areas specific training to identify process solution tanks and pipelines in their respective work areas.

Pipes containing cyanide are marked as containing cyanide solution and flow direction is indicated. Cyanide storage and process tanks are marked as containing cyanide.

Merian maintains Safety Data Sheets (SDS) for all chemicals on site inclusive of sodium cyanide. Hard copy documents and/or permanent stands are maintained locally for bulk chemical storage areas such as the cyanide offloading and storage areas.

In addition to the SDS sheets, signage is available to alert personnel to chemicals and required emergency response requirements in the high risk cyanide areas. All materials are written in both English and Dutch, the languages of the workforce. Verification was conducted by visual verification of material included in the binders.

In the event of a cyanide exposure, the Event Reporting and Investigation Management System (MSP) procedure is in place to investigate and evaluate cyanide exposures to identify root causes for corrective actions. This procedure is linked with the Newmont Event Reporting and Significant Potential Event (SPE) program ensuring adequate level of management review.

The intent of the MSP is also to determine the classifying, reporting and investigating events, determining underlying causes, preventing recurrences and communicating outcomes to relevant stakeholders across Newmont. One objective is to perform technical analysis of the incidents through determination of primary causes, generating corrective actions and control measures, monitoring and learning, allowing continuous improvement in the risk management to prevent recurrence.

No significant cyanide-related accidents have occurred at Merian during the recertification period. However, a cyanide-related incident was recorded in April 7, 2019. While conducting a repair of the cyanide return line that showed signs of crystallization, solution containing cyanide flowed out of a small hole drilled into the pipe and splashed onto a worker. Some of the solution also temporarily sprayed out of secondary containment. The worker was wearing a full face visor and chemical mix suit and solution did not penetrate onto their person or clothing. Among the immediate actions taken, the worker was

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escorted to the medical centre for precautionary evaluation and monitoring. The area was barricaded, the flow of the solution was controlled to flow directly into the lime bund and earthen berms were placed around the spilled area. The incident report includes a description of the event details, pictures of the scenario, timeline – critical components of event sequence, contributing factors, 5-Why analysis and corrective actions, all closed up to May 2019.

### *Standard of Practice 6.3*

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

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

Merian has made available water, oxygen, resuscitators, radios, telephones, and alarms in the process plant and clinic. Oxygen bottles, resuscitators and first aid kits are located throughout all the places at the process plant where cyanide in reagent grade is present.

Emergency response equipment to ensure effective response to any possible exposure scenarios includes MicroVent emergency resuscitators (a gas powered ventilatory resuscitation device), oxygen resuscitation kits (oxy-packs), self-contained breathing apparatus (SCBA), chemical suits and cyanide antidote kits (Cyanokits).

The locations of the emergency equipment were deemed to be appropriate for the operation. The cyanide antidote kits are kept only in the medical clinic. This is because only a medical doctor can administer the Hydroxocobalamin. The plant is less than 150 meters away from the medical clinic. Operators are required to carry a radio while performing their tasks. All fixed HCN monitors are equipped and set with an alarm system. Verification was conducted by visual inspection of the cyanide antidote kits and interview with Health and Safety Superintendent.

The alarm systems for all the HCN monitors and showers are visual and sound alarm and are hard wired to the control room that is manned 24-hours/7 days.

Merian regularly inspects the cyanide first aid equipment to make sure it is available and when needed. This includes daily checks by area operators. Merian has also monthly formal checks by the Emergency Response Team (ERT), Health and Safety personnel and others, to ensure it is available and in working conditions if needed. The checklist includes the inspection of cyanide antidote kits (storage requirements and expiration dates), oxygen, facemask, spill clean-up equipment and tools, and the ambulance. The

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Response equipment and inspection frequency is maintained in the site emergency response equipment register.

Cyanokits are stored at the on-site clinic as directed by their manufacturer and replaced on a schedule to ensure that they will be effective when needed. Additionally, Cyanokits are kept at the Moengo clinic and clinic staff have been instructed on how to administer the kits.

Cyanide first aid equipment (cyanide kits oxygen) is inspected prior to a cyanide solution preparation event. Antidote expiration dates and oxygen tank pressures were checked during the audit. All antidote kits were within expiration date and oxygen tanks were fully pressurized. Verification was through visual examination of the antidote kits expiration dates, interviews with process personnel and onsite doctor and nurse, and review of inspection records. Paramedics perform daily inspections of the ambulance, cyanide kit and oxygen located in the medical clinic. Inspections are documented.

Merian has developed a specific procedure to respond to cyanide exposure, Guideline for Medical Treatment of Cyanide Poisoning. The guideline describes in detail what is to be done in the event of a cyanide exposure. The guideline includes personnel responsibilities, intoxication levels, first aid procedure, and medical attention. The first responder in the place initially will aid the victim securing the area and administering oxygen, then will come the Emergency Response Team (ERT). Specific instructions are given for treating victims who are exposed to sodium cyanide via inhalation, ingestion, and dermal routes. Instructions detail the steps to be taken for conscious versus unconscious victims. Then the medical services will receive the victim decontaminated by the ERT to receive treatment with the Cyanokit, if necessary.

To provide first aid and medical assistance to workers exposed to cyanide, Merian has a complete medical clinic onsite that is located within 150 meters of the process plant and cyanide laydown area. The clinic is staffed with one a doctor and one paramedic during the day shift. The doctor is on site and on call during the night. Each shift has a nurse on staff. The mine also has two fully equipped ambulance with paramedic at the medical clinic. Given the remote location and capabilities of local hospitals, Merian has determined that personnel are best treated at the on-site clinic with its trained staff and equipment For this reason, personnel will not be transported to any local facilities for treatment until they are stabilized.

The doctors nurses and paramedics are qualified to provide medical/emergency assistance. The onsite doctors, nurses, paramedics and the ERT have been trained in first aid related to cyanide exposure. In occasion of the audit, the ERT was made up of 23 in 3 crews, with 16 emergency responders on site, plus medical personnel.

Due to the nature and location of the operation, Newmont will not utilize the services of local hospitals for the treatment of on-site cyanide exposures until the patient is stabilized. Exposures resulting from the transport of cyanide product from the Port of Moengo will be treated at the Moengo medical facilities

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or the on-site clinic, depending on which location is closer. Medical and other first responders from Moengo have participated in Emergency Response Training, HazMat training and have demonstrated the skills necessary to provide Cyanokit treatment and stabilization to patients exposed to cyanide.

In the event that a cyanide exposure, the victim once stabilized and if requires medical attention beyond the capabilities of the on-site medical clinic, the ambulance maintained at the clinic will transport the victim to the Academic Hospital, the main hospital in Paramaribo.

Merian has also contracted a local helicopter company to air transport a worker exposed to cyanide to Paramaribo and outside of the country for additional medical treatment. Merian has an airstrip that will be utilized for air evacuation.

Merian has made formalized arrangements with local hospitals in both Moengo and in Paramaribo. Merian has supplied two Cyanokit to each hospital. The Merian clinic physicians also trained the hospital doctors on the use of the Cyanokit. In the event of a cyanide exposure emergency and the need to transfer a patient to the hospital, the site will treat the patient on site and then go with the patient to the hospital.

The medical staff at Merian is confident that the medical facilities have adequate, qualified staff, equipment and expertise to respond to cyanide exposure. The auditor reviewed signed letters of agreements with the hospitals.

Mock drills are held no less than every six months to test the emergency response capabilities of process plant and emergency response personnel including the provision of first aid. These drills test the capabilities of various types of emergencies including both cyanide exposure and environmental spillages across the complete response chain. Drills for other identified emergency events are also completed on a routine basis to maintain an adequate level of emergency response preparedness. Records of the drills, the outcomes and the corrective actions are maintained by the site for a period of not less than three years.

The Cyanide Management Plan (CMP) requires Merian to conduct mock emergency drills and/or desktop scenarios to test the emergency preparedness and response of Process Plant, ERT, Environmental, H&S, Security and other relevant departments & personnel. Verification was through interviews with the Health and Safety Superintendent, ERT Coordinator and Environmental Specialist and review of the CMP, records and photos of mock cyanide drill.

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### 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 Standard of Practice 7.1  
 in substantial compliance with  
 not in compliance with

Merian has developed the Process Plant Emergency Plan (ERP) to address potential accidental releases of cyanide. This document outlines the various credible event scenarios for the operation and the responsibilities, actions, and notifications required to ensure an effective and efficient response. In addition to this plan, the following documents assist with emergency response scenarios related to cyanide incidents:

- Cyanide Emergency Spill Response SOP
- Process Spill Response and Monitoring Location Maps
- Emergency Sampling SOP
- Merian Emergency Response Plan
- Cyanide Event Management SOP
- Medical Emergency Response Plan
- Rapid Response Plan at Newmont
- Cyanide Medical Treatment SOP

Verification was conducted by reviewing these documents and interviews with the Health and Safety Superintendent and Medical staff.

The ERP lists the various credible event scenarios for the site inclusive of cyanide incidents including cyanide exposures, transportation accidents and cyanide theft. For each section, actions and/or supporting procedures are outlined to ensure adequate levels of response. These are further supported by the Newmont Rapid Response system which may be initiated for significant events.

The ERP and procedures provide response actions for all potential cyanide failure scenarios identified. Merian has developed the Process Plant Emergency Response Plan (ERP) and the Emergency Cyanide

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Spill Response SOP (CN SRP) that include appropriate cyanide failure scenarios for the site, including the following:

- a) Procedures to be followed in the event of a release of hydrogen cyanide.
- b) Transportation accidents. A convoy is used to road transport cyanide product from the Port of Moengo to the Merian mine site. The cyanide transporters, as explained in Standard of Practice 2.1, provide product transport services and have emergency response plans for their respective 'chain of custody' areas as it relates to transport of cyanide product to Merian mine site. Consideration has been given to transportation routes and response capabilities along the way.
- c) Procedures to control exposures and releases during unloading are described in the SOP Cyanide Sparging.
- d) Procedures for fire and explosion events related to cyanide are described in the ERP.
- e) Procedures to follow in case of a pipe, valve or tank rupture incident related to cyanide are described in the CN SRP.
- f) Procedures for overflow of ponds and impoundment areas are described in the CN SRP and in the ERP.
- g) Actions to ensure that critical equipment continues to operate and ensure environmental compliance as well as preventing operational / mechanical interruptions and failures are detailed in the STP Manage Emergency Power Load.
- h) Procedures for uncontrolled seepage area described in the ERP.
- i) Procedures in case of failure of the cyanide destruction system are described in the SOP High WAD CN Event Shutdown.
- j) Procedures for the response in case of failure of the tailings storage facility are described in the ERP.

Merian works together with its ICMC - certified cyanide transporter Haukes to ensure that all transportation-related emergencies are considered and that emergency response plans for such incidents are on file and up-to-date. Haukes is responsible for the cyanide delivery from the Moengo Port to Merian's cyanide laydown area adjacent to the cyanide sparge/mix area. Cyanide is transported to site in double-walled isocontainers.

Haukes did consider the transportation route, physical and chemical form of the cyanide, method of transport (truck), the condition of the roads and the design of the transport vehicle during the development of their emergency response plan. Haukes will be responsible in the event of an emergency in route (spills, accidents, etc.). Haukes has an emergency response vehicle that escorts every cyanide delivery.

Cyanide response plans and procedures have been developed to provide a suitable level of detail to ensure that effective response can be completed in an emergency situation. The ERP and the Emergency

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Cyanide Spill Response SOP cover a range of credible event scenarios and the immediate and longer term actions required to control the event.

The plans and procedures describe in detail the procedures for clearing site personnel from the areas of exposure, first aid in case of cyanide exposure, control and containment of releases at their source, assessment of the emergency and mitigation of future prevention of releases. These plans and procedures specifically address the treatment procedures with cyanide antidotes for personnel who may have been exposed to cyanide and plant and site evacuation, if necessary.

Verification was conducted by reviewing the related documents and interviews with the Health and Safety Superintendent, ERT Coordinator, the Operations Superintendent, the Environmental Manager and the Medical staff.

### *Standard of Practice 7.2*

Involve site personnel and stakeholders in the planning process

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

The Emergency Response Procedures developed for Merian involve cross-functional teams from the Process, Health, Safety, Security, Environmental, Community Relations and other departments as needed. This helps to ensure that adequate consideration is given to the various impacted stakeholders and ensures that personnel understand and are aware of their roles in an emergency.

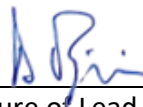
External stakeholders do not have a direct involvement in Emergency Preparedness and Response Planning, however the Social Responsibility team maintains contact with community figures and utilizes community liaison officers to share relevant information with affected peoples regarding emergency response planning and address their comments and feedback. Merian conducts regular stakeholder meetings with the communities. Members of the communities are also able to visit Merian's office in Moengo where they have the opportunity to voice their concerns and ask question to personnel of the operation.

Merian's workforce is regularly approached by the operation through shift toolbox meeting, monthly safety meetings and tasks hands-on observation activities with the objective of getting their opinion and concerns about emergency response practices that can then be incorporated to the emergency response procedures, if necessary.

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Although potentially affected communities do not play a direct role in Emergency Response Planning, Merian Social Responsibility personnel maintain a Community Evacuation Notice Procedure and a Community Emergency Water Support Procedure that would be implemented in the event of a cyanide release that could potentially impact a community. These procedures have been discussed with community leaders to effectively disseminate information about possible emergency situations and responses.

Merian has informed the communities near the transportation route about cyanide, its use at the mine, emergency response and equipment that will be part of the cyanide transportation convoy. Also informed them about the nature of the risks associated with accidental cyanide releases.

Through the use of community information centers and community relations personnel, Merian is able to ensure communication flow with relevant stakeholders prior to and/or in the event of an emergency situation

Due to the location and response capacities of local agencies, Merian would maintain responsibility for emergency response activities within the communities it required. Local medical, fire and police services have participated in training (e.g. HazMat training) and will coordinate with Merian personnel in the event their response is required.

Local agencies (e.g. Fire and Police) have a statutory responsibility to assist with notification and mobilization of people under direction from Merian. In addition, Merian has standing contracts with transport companies and other community service providers to help with mobilization and evacuation of personnel if required under direction from Merian Rapid Response personnel.

Verification was through interview with Health and Safety Superintendent, ERT Coordinator, the Social Responsibility Superintendent, the Supply Chain Superintendent and medical personnel.

Local community leaders and impacted persons will be oriented by the Social Responsibility department and/or other relevant personnel of emergency response plans and requirements including updates if and when changes to the mine facilities dictate a change in the emergency response plans.

Merian has not designated specific responsibilities to off-site responders or communities with the exception of the hospital agreements for treating patients that have been exposed to cyanide.

Merian's ERP states that the ERP shall be updated and reviewed as a minimum on an annual basis or when there is a significant change, shift, risk or expansion within the operation as outlined in the scope of this plan. Merian's revision involves responsible operators from all areas in the revision process. Verification was by reviewing the document control section of the ERP and interviewing the Health and Safety Superintendent.

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### *Standard of Practice 7.3*

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

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

The Merian ERP (site wide) and the Process Plant ERP contain the following cyanide related elements:

The operation has a volunteer Emergency Response Team (ERT) with 24/7 site coverage. A Security Control Center (SCC) is in place to receive calls and notify ERT of emergency situations as reported via phone, radio or other means. The SCC, ERT and/or Area Supervisors have been designated the appropriate authorities to commit required resources and take command of emergency situations including handover to more senior or better trained personnel as required.

The Merian Emergency Response Plans explain the emergency resources available to respond to emergencies at the process plant and ancillary facilities. These documents list the various responsibilities and activities of personnel including the minimum training requirements which have been established. These training requirements include but are not limited to: Emergency Call-Out procedures, CN Spill Response, Cyanide First Aid, HAZMAT response.

To support the emergency response programs on site, an Emergency Equipment List has been developed which lists all relevant cyanide emergency equipment, frequency of inspection and responsibility for checks. This document is maintained by Process and Health & Safety personnel.

The ERP include a 24-hour call out procedure and a full internal contact information list that includes coordinators and members of the ERT, include a complete list of the equipment and materials available to be used for on-site emergency response. Inspections to the emergency response equipment are on a monthly basis to ensure that they are maintained in working conditions.

Merian has not assigned specific responsibilities for internal emergency response to outside agencies.

Verification was through interviews with the Health and Safety Superintendent, medical staff and review of the ERP and the Process Plant ERP.

Although Merian has not assigned specific responsibilities for internal emergency response to outside entities, however, outside entities that may participate in emergency response scenarios include local agencies (police, fire, medical) as well as community service contractors working for Merian. These personnel will work with and under the direction of Merian personnel as requested to assist with mobilization of people.

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Merian included members of the police, fire department, hospital, and district community office in Hazardous Materials Training and refresher training. Merian has formalized agreements with hospitals in Moengo and Paramaribo in which they agree to treat all patients that have been exposed to cyanide brought in by Merian.

### *Standard of Practice 7.4*

*Develop procedures for internal and external emergency notification and reporting.*

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

The Newmont Event Reporting & Investigation and Emergency Response protocols document the notification requirements for both notification to internal management personnel and external agencies. The Rapid Response system supports these programs by providing the platform and notification to regional and corporate personnel based on event consequence levels with real-time data snaring to all Rapid Response participants.

The ERP includes procedures and contact information for notifying Newmont Corporate management, Merian management, regulatory agencies and the hospitals in Moengo and Paramaribo. The ERP has a communications flow chart for emergency situations. Appendix 1 of the SOP Emergency Cyanide Spill Response also has a notification flow chart.

In the event of a major cyanide incident, the Senior Director External Relations (or the person designated by him) will notify the corresponding national institutions as the NCCR (National Coordination Center for Disaster Management) , among others.

The Emergency Response and Rapid Response Protocols provide clear lines of responsibility for relevant departmental personnel to contact and notify community members of emergency situations. The Social Responsibility team maintains a listing of key community leaders and potentially affected people in the nearby communities.

The External Affairs team maintains a notification and evacuation procedure to ensure that an effective and efficient response can be initiated in the unlikely event it is required. This document is maintained by the Social Responsibility team and includes the contact listings and call-out approaches to notify community leaders.

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The Rapid Response system provides a protocol and contact information to ensure that media inquiries and communications are adequately handled and communicated in an appropriate manner by authorized personnel.

Any and all media enquiries that relate directly to Merian operations, its business and or any associated companies, including the safety and wellbeing of people working for Merian must be referred directly to the Site Response Team (SRT) Leader. The SRT Leader is responsible for ensuring that the enquiry is dealt with as per the Media Management Plan template available in the Rapid Response System.

Verification was conducted by reviewing the Procedure Community Evacuation Notice, Rapid Response System and interview with the Social Responsibility Superintendent.

### *Standard of Practice 7.5*

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

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

The Emergency Response Plan, Environmental Monitoring and Management Plan and Emergency Cyanide Spill Response SOP provide detailed information on cyanide event remediation activities including control and containment of any spilled/released material. Specifically, the plans include guidance on:

- a) Recovery and/or neutralization (it required) of solids and solutions tor final disposal in the mill or TSF. If the spill had taken place within the cyanide storage bunded area, the solution may be pumped back into the storage tank via the cyanide bund sump pump. The contaminated material must be removed and disposed of into the SAG mill.
- b) For decontamination, remediation and monitoring of the affected areas, debris, and equipment, the procedure Emergency Cyanide Spill Response describes specific remediation measures that include sampling the soil and solution until sample indicate that no more WAD cyanide is present.
- c) The contaminated absorbent material must then be picked up and placed in plastic bags or containers. The contents of these containers must immediately be added back into the SAG mill and/or disposed of in the tailings dam as directed by senior plant management.
- d) Regarding provision for alternative drinking water sources tor communities, Merian Social Responsibility personnel maintain a Community Emergency Water Support Procedure that

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would be implemented in the event of a cyanide release that could potentially impact a community. These procedures have been discussed with community leaders.

The Emergency Cyanide Spill Response SOP describes the requirements and precautions for cyanide spill cleanup which prohibits use of neutralizing agents as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to remediate to treat cyanide on surface waters that in areas where it could reach storm water collection or surface water bodies. Due to the hazardous nature and potential impact of neutralizing agents, 8-20% sodium hypochlorite solution will only be used to clean-up a cyanide spill when directed by senior process management.

The Emergency Cyanide Spill Response SOP and environmental monitoring plans require monitoring of spilled process solution and sampling of downstream water bodies. Process personnel obtain initial slurry and/or solution samples while environmental monitoring personnel have responsibility for additional downstream and surface water sampling. As part of the notification process in the emergency response protocol, the lab personnel are notified of the cyanide spill event and to prepare for emergency sample analysis for cyanide content to ensure quick turnaround times.

The Environmental department has developed and maintains an emergency sampling procedure which specifies the sampling methodology, sample types and parameters for emergency samples. The procedure also contains an emergency environmental monitoring point map to support sampling teams.

The procedure Emergency Environmental Monitoring requires that water is sampled and monitored after a cyanide spill in order to assess the magnitude of the impact and implement the correct mitigation measures as necessary. The document describes the procedure for sampling including methodologies and parameters. The procedure includes sampling maps for the plant area and water bodies.

### *Standard of Practice 7.6*

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

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

Merian's ERP states to be updated at least once a year, or more often if changes need to be implemented as a result of mock drill evaluations or changes in the operation. These changes were verified during the audit.

Merian conducts mock emergency drills scenarios no less than twice a year to test the emergency preparedness and response of Process Plant, ERT, Environmental, Health, Safety & Loss Prevention

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(HSLP), Security and other relevant departments and personnel. Drills are developed to include a variety of locations and scenarios including environmental release and exposure responses. Drills are developed in advance and risk assessed to minimize potential impact of event unpreparedness. In addition to the mock drills, any event will be also used to test emergency response capabilities. Records of cyanide drill outcomes and reviews are stored by Health & Safety personnel.

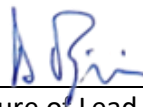
Verification was through interviews with the Health and Safety Superintendent, ERT Coordinator, the Environmental Specialist and review of the CMP, records and photos of the cyanide related mock drills performed during the recertification period.

The Cyanide Management Plan requires that all cyanide related emergencies and drills are investigated to develop corrective actions and continuous improvement opportunities. Events and mock drills will be debriefed to identify and document improvement opportunities and actions for assignment to appropriate personnel. During this recertification period there was no event needing to activate de ERP, no reviews to the ERP have been performed due to this reason.

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### 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 Standard of Practice 8.1  
 in substantial compliance with  
 not in compliance with

All personnel and visitors to the site attend a site induction training which discusses cyanide hazards present on the site. The training covers but is not limited to locations where cyanide is present, alarm response, PPE requirements, safe handling and management guidelines, symptoms of exposure, cyanide first aid and emergency response.

Merian has included cyanide management requirements in several training courses. The level of detail and depth of these training courses depends on the type of personnel being trained. The general induction which is provided to all workers, contractors and visitors includes a section about cyanide management. This was verified during the general induction training received by the auditor upon arrival to site.

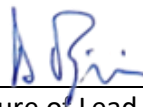
Security contractors who are located close to cyanide facilities have specific training requirements as specified in procedure Process Gravity Circuit Post Order, including Process Plant induction, Cyanide Awareness training, respirator safety and gas badge pro training, buddy system procedure and cyanide offloading procedures. Cyanide related topics are also discussed as refreshers in each toolbox meeting.

Merian requires all eligible employees to have refresher training in Cyanide Awareness every year. Refreshment training needs is monitored by means of the Training Matrix. Train Track data base is checked at least once a week to identify employees due for refreshment training. A monthly training schedule is developed and distributed to department heads so they can line up their people for training.

The Learning and Development (L&D) department is responsible for maintaining training records for all personnel on site in the L&D database. Records kept include trainee and trainer name, training type, course, date of completion and test scores. Employee training requirements and completion records are maintained and managed.

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### *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 Standard of Practice 8.2  
 in substantial compliance with  
 not in compliance with

All personnel that work in the plant must undergo training prior to being allowed to work at the process plant. Prerequisite training includes site induction, plant induction, plant general/specific orientation and safety awareness (classroom & field) sessions, to ensure that all operators understand and are able to operate the various areas of the plant in a safe and environmentally responsible manner. In addition, after successful completion of these training sessions, operators are assigned to a specific circuit and work under the direction of a competent operator until they have been deemed competent to work without direct supervision.

Formal training in working procedures is given in cyanide-related tasks, among others, including cyanide unloading and storage, preparation, production and maintenance. Determination of competency is based on test score and observations by qualified and/or experienced plant operators and/or maintenance personnel.

Training includes On the Job Training, which is conducted by a qualified trainer who shows in the field how to safely conduct tasks related to cyanide management; and Planned Task Observations, which is conducted by the supervisor of the trainee.

Training elements for each specific job are identified in the work procedures and presentations that are used as training material. Personnel are trained following the work procedures, which include the step by step process to perform the job. These work procedures include the objective of the procedures, photos of the task/activity to be conducted, required PPE, decontamination requirements, risks associated with the cyanide task, contingency plans and the individual task specific steps. .

Training modules include elution, pre-leach thickener, tailings disposal, grinding, gravity, leach CIL, gold room and reagents, among others. Training includes two type of assessments, theoretical and practical.

The L&D department provides training & competency testing to process department personnel. Qualified L&D trainers have industry experience and a have been certified as trainers. To support the L&D trainers, the process plant employs a number of qualified supervisory and management personnel with adequate knowledge, experience and qualifications to train personnel on the necessary techniques and requirements for safe and environmentally sound process plant operations.

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Merian has experienced personnel in cyanide and milling processes conducting the Process department training. Internally, Merian has a team of leader trainers, with more than 30 years of experience in cyanide management. In addition, Process supervisors with several years of experience in the milling processes provide task specific training to operators. Merian also uses external support from Cyanco to provide training to the personnel.

All personnel in job positions that involve the use of cyanide and cyanide management are required prior to working with cyanide, to receive training on how to perform their assigned tasks with minimum risk to worker health and safety. After completing the pre-requisite training, employees complete a classroom-training program prior to working with cyanide.

Individual training is provided for each specific cyanide related task that an operator will perform and includes cyanide work procedures. A senior/junior on-the-job training approach is used to further training for the personnel on job activities and cyanide safety. New trainees are assigned to work in one of the circuits under the supervision of a competent operator. These trainees are required to work under direction of these competent operators until they demonstrate ability to work without direct supervision in a safe and responsible manner.

Cyanide awareness refresher training is delivered by the Process department no less than annually. To ensure that personnel maintain proper work procedures and performance levels, supervisors routinely and randomly conduct Planned Task Observations (PTOs) of various activities for each crew. Feedback from the PTO is then provided to each employee to correct and/or improve work/task behaviors.

Merian training matrix indicates that refreshers of the Cyanide Awareness training course should be taken every year. The Process training department prepares a training schedule for a month and keeps track of employees and contractors which training is lapsing by the end of the month. This information is then distributed to department heads so they can line up their personnel for training.

To evaluate the effectiveness of task specific training related to cyanide, tests are usually taken after a classroom training session while planned task observations are conducted by the supervisor of the trainee after on-the-job training sessions. Training programs include an assessment component to ensure that personnel are able to understand the training that they have completed. Testing can be done either via a written exam or practical assessment by qualified Process Plant trainers.

For classroom training, written tests are developed and suitable pass rates are established for personnel taking the exam. Test scores are then recorded in employee's training records with a "Pass/Fail" designation.

Employee training records are entered into the training database for each employee. These records are maintained for the duration of employment and include the names of the employee and the trainer, the dates, topics covered, test and assessment scores/ratings.

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A training matrix is generated from the training database to assist process plant personnel in their training progression and refresher exercises. Records are maintained by the Plant safety-training group. Samples of records were available and reviewed and were found to be complete.

### *Standard of Practice 8.3*

*Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.*

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

Operators participate in process plant induction training which discusses the response requirements for cyanide releases including first aid measures. A number of personnel from each crew are also nominated to attend first responder and/or first aid training to provide initial emergency response before the ERT arrives. These emergency response training sessions are conducted by qualified personnel from both internal and external sources and include courses such as decontamination, HAZMAT response, CN and basic first aid.

The Cyanide Awareness training for cyanide unloading, preparation, process and maintenance personnel, includes a spill response section and also a written assessment. Also, training in spill response is conducted, including neutralization, decontamination, and first aid and oxygen administration.

Verification included review of training record and interviews with operators as well as process and safety personnel. Operators were interviewed and demonstrated good awareness of what actions are to be taken in the event of cyanide release. Records of training attendance were reviewed by the auditors and found them complete.

Process plant first responders and ERT personnel are trained in cyanide first aid, decontamination and cleanup procedures. To supplement the training program, personnel are routinely involved in drills to test their retention of emergency response. Decontamination training is provided through the Cyanide Awareness course. The Learning and Development area also provides first aid training and emergency procedures. First responders and ERT members undergo periodic refresher training exercises to ensure they are able and ready to respond to various scenarios across the plant.

Verification included review of training records, mock drill reports and random interviews with operators.

The operation has a fulltime Emergency Response Team (ERT) trained to the Merian Emergency Management Plan requirements and in the use of necessary response equipment. In addition, Process

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Plant Responders receive communications and training on their roles relating to the Process Plant Emergency Management plan. Knowledge of these plans and understanding of the plans is tested through periodic drills and actual events.

ERT members are trained through participation in mock drill exercises as well as formal training programs. Formal brigades are in place for fire, first aid, spill, and evacuation. Emergency responders are available on all shifts. Fire wardens (emergency coordinators) are also trained on how to react in emergencies situations, including cyanide related events.

Due to the remote location and capability of local agencies, Merian does not use external agencies in the event of an emergency situation on site. Emergency Responders for events at the Port of Moengo or along the transport route are involved in Emergency Response Plan discussions and training as appropriate (e.g. HazMat training, administration or Cyanokits).

Cyanide emergency response drills are scheduled no less than two times a year to test the emergency response systems and capabilities of site personnel. Various types of responses are tested including both cyanide spillages and exposure scenarios.

The Emergency Response Team (ERT) trains every Saturday to ensure that are able to respond to an emergency and that their skills remain current. Mock drills for cyanide events have a frequency of two per year. Evidence of drills conducted during the recertification period. Verification included review of training records, mock drill reports and random interviews with operators.

At the completion of emergency response drills, debrief sessions are held to review and identify the actual versus expected outcomes of the emergency response to identify opportunities for improvement and changes to training and awareness programs. When deficiencies are identified in the response, corrective actions are assigned to relevant personnel which may include modifications to training and/or awareness programs to ensure that gaps are addressed.

The auditor reviewed the mock drills reports and supporting documentation to verify that action items identified for the mock drills have been accomplished. Records of the mock drills debrief and training sessions were also reviewed to verify the evaluation of drills considers the adequacy of training.

Records of emergency response training are documented in the L&D training database. These include training conducted by internal and external parties. Training records are administered by the L&D department with inputs from the functional areas.

Samples of records were reviewed and found to be complete. The name of the employee, the name of the trainer, the date of the training, the topics covered, and the result of the testing are maintained as part of the record files. Verification was through interview with training and process personnel and review of training records.

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### 9. *DIALOGUE:*

*Engage in public consultation and disclosure.*

#### *Standard of Practice 9.1*

*Provide stakeholders the opportunity to communicate issues of concern.*

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

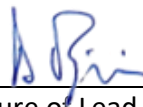
Merian has developed a community engagement plan with a variety of activities and programs to engage community members and other external stakeholders on a regular basis. These programs include community information centers, routine face-to-face meetings/engagements, complaints and grievances, site tours, company website, media relations team and communications. Communication engagement meetings are targeted at groups identified by stakeholder mapping activities. The program provides stakeholders with the opportunity to share and discuss cyanide concerns.

There are several different types of stakeholders for the Merian operations. Merian has an “open door” policy in their Moengo office. Merian provides the opportunity for stakeholders to communicate issues of concerns in different ways depending on the type of stakeholder.

Merian has a grievance mechanism (External Complaints and Grievance Mechanism procedure). The purpose the grievance mechanism is to Merian to be able to receive, process, manage and resolve written or verbal complaints and grievances in a culturally sensitive, timely and consistent manner. The procedure defines roles and responsibilities, the process system and monitoring and reporting requirements. Merian has also hosted various meeting with public institutions regarding cyanide use and management.

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### *Standard of Practice 9.2*

*Initiate dialogue describing cyanide management procedures and responsively address identified concerns.*

The operation is  in full compliance with Standard of Practice 9.2  
 in substantial compliance with  
 not in compliance with

A variety of stakeholder engagements and interaction methods are in place at the Merian operation . These include face-to-face communications Via Community Liaison Officers, Community Information Centers and other meetings and tours.

Operating practices and programs are shared with local communities and questions are answered by Social Responsibility and Communications personnel. With regards to cyanide management, Merian and Newmont shares information with communities about the company's responsible management practices and offers an overview of the cyanide facilities and programs during site tours.

Stakeholder concerns or complaints identified via tours, meetings, community information centers or other means are logged in the stakeholder management database. Here, these concerns are reviewed, evaluated and responses are provided to concerned persons and/or groups.

Merian provides the opportunity to interact with stakeholders through their office in Moengo and through regular visits to the communities. The Moengo office has an “open door” policy by which stakeholders can communicate issues of concern related to the operation. Merian also provides the opportunity to interact with stakeholders through regular visits to the communities. Stakeholders can communicate issues of concern related to the operation through the Compliance & Grievance Process. Verification that the community meetings are conducted was through review of the Social Responsibility department’s monthly engagement schedule that includes meetings and action items. Also reviewed were meeting records, presentation materials and posters provided to the communities and interview with the Social Responsibility department.

Merian offers mine site tours and has a specific procedure for the tours to formalize the organization and conduct of mine site tours as well as describe and spell out safety and operational procedures for all site tours. The purpose of site tours is to expose stakeholders to the Merian operations in order to enhance their appreciation of the company’s activities. Site tours are also strategic engagement tools aimed at reducing negative perception about mining as well as maintaining their social license to operate.

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### *Standard of Practice 9.3*

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

The operation is	<input checked="" type="checkbox"/> in full compliance with	Standard of Practice 9.3
	<input type="checkbox"/> in substantial compliance with	
	<input type="checkbox"/> not in compliance with	

Merian utilizes a global website to share information on cyanide management practices and information as it relates to global operations. Information regarding the Newmont’s management systems that are used to manage environmental, safety, health, and community relation topics is available on the internet. Newmont publishes its annual sustainability report, Beyond the Mine on Newmont’s website on the internet and includes compliance reporting.

Merian has developed fact sheets to share with community members in a way that can be easily understood. Also, has developed written descriptions of how their activities are conducted and how cyanide is managed and has made these available to communities and other stakeholders.

Fliers and posters with the subjects What is Cyanide, How Dangerous is it and its Transportation were distributed to the local communities in the local languages. A presentation titled “Cyanide and Hazardous Materials Story” was provided to different Pamaka communities. Merian’s Social Responsibility staff regularly visits various communities to provide information sharing.

Due to the literacy rates and various languages spoken in Suriname, face-to-face communications via Community Liaison Officers, Community Information Centers and other meetings and tours offer the best mode for stakeholder interaction. Where possible, pictures, illustration and other visual content are used to explain Merian’s management practices in oral form (i.e. presentations provided to communities during workshops).

Merian's parent organization, Newmont Mining Corporation, publishes an annual sustainability report providing a variety of sustainability event information as submitted by each mine site across the company's portfolio. Information on the site includes cyanide related incidents including exposures, CN releases off the mine site requiring response/remediation, CN releases off the mine site resulting in significant adverse effects to health and/or environment, CN releases requiring reporting and CN releases which exceeded applicable limits.

In addition to the sustainability reporting, media events and statements are organized as required by the Communications team to provide the media and interested stakeholders with relevant data regarding performance and events that impact the mine site and/or surrounding communities.

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No cyanide exposures have occurred at Merian since the start of operations, but they do have a mechanism in place to report them. Newmont produces an annual sustainability report As described in the Cyanide Emergency Response Plan (ERP), Merian will immediately report any cyanide exposure resulting in hospitalization or fatality to the Provincial Police, Ministry of Health and the Ministry of Labor.

Merian has developed a risk assessment matrix that ranks the severity of various cyanide events. Depending on the nature of the event and severity there would be different levels of notification both to Newmont Corporate and various National and Provincial agencies.

Merian has not had any of these incidents occur but they do have a mechanism in place to report them. Newmont produces an annual sustainability report, Beyond the Mine, which is published on Newmont's website on the internet and includes compliance reporting.

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