

NEWMONT CORPORATION MERIAN
MINE

SUMMARY AUDIT REPORT

FOR THE
INTERNATIONAL CYANIDE
MANAGEMENT CODE

AUGUST 2024



Tel +51.947.259.440 | Email bpizzorni@cyanideauditor.com | Web CYANIDEAUDITORS.COM

Contenido

Operation General Information 4

Operation Location Detail and Description 4

Auditor’s Finding 10

Compliance Statement..... 10

Auditor Information 11

Auditor Attestation 11

PRINCIPLES AND STANDARDS OF PRACTICE 12

 Principle 1 | PRODUCTION AND PURCHASE 12

 Standard of Practice 1.1..... 12

 Principle 2 | TRANSPORTATION 13

 Standard of Practice 2.1..... 13

 Principle 3 | HANDLING AND STORAGE 15

 Standard of Practice 3.1..... 15

 Standard of Practice 3.2..... 17

 Principle 4 | OPERATIONS 20

 Standard of Practice 4.1..... 20

 Standard of Practice 4.2..... 29

 Standard of Practice 4.3..... 31

 Standard of Practice 4.4..... 34

 Standard of Practice 4.5..... 36

 Standard of Practice 4.6..... 37

 Standard of Practice 4.7..... 39

 Standard of Practice 4.8..... 42

 Standard of Practice 4.9..... 44

 Principle 5 | DECOMMISSIONING 47

 Standard of Practice 5.1..... 47

 Standard of Practice 5.2 48

 Principle 6 | WORKER SAFETY 50

 Standard of Practice 6.1..... 50

 Standard of Practice 6.2..... 54

 Standard of Practice 6.3..... 60

 Principle 7 | EMERGENCY RESPONSE..... 66

 Standard of Practice 7.1..... 66

 Standard of Practice 7.2..... 70

 Standard of Practice 7.3..... 72

 Standard of Practice 7.4..... 77

 Standard of Practice 7.5..... 78

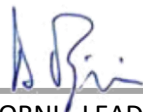
 Standard of Practice 7.6..... 80

 Principle 8 | TRAINING 83

 Standard of Practice 8.1..... 83

 Standard of Practice 8.2..... 85

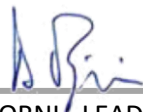
 Standard of Practice 8.3..... 88



Principle 9 | DIALOGUE AND DISCLOSURE..... 92

 Standard of Practice 9.1..... 92

 Standard of Practice 9.2..... 93



Operation General Information

Name of Mine:	Merian
Name of Mine Owner:	Newmont Corporation (75%) Staatsolie Maatschappij Suriname N.V. (25%)
Name of Mine Operator:	Newmont Suriname LLC
Name of Responsible Manager:	Lelis Abanto - Environmental Manager
Address:	Recolaan 17, 4th floor Paramaribo, SURINAME
Mine site location:	Moengo-Langatabiki road, 66 kilometers south of Moengo District of Sipaliwini – SURINAME
Telephone:	+597 427707 extension 28350
E-mail:	Lelis.Abanto@Newmont.com

Operation Location Detail and Description

Newmont's Merian mine operation in Suriname is an open pit gold mine approximately 66 km south of the town of Moengo and 30 km north of the Nassau Mountains near the French Guiana. Newmont Corporation owns a 75 percent interest in the limited partnership, and Staatsolie Maatschappij Suriname N.V., Suriname's state-owned oil company, owns the remaining 25 percent interest. Construction of Merian mine began in August 2014, and commercial production was achieved in October 2016, on schedule and \$150 million under budget.

The mine is an open pit exploitation. Date of first production was Q4 2016. Newmont began exploring the project in 2004 and began construction in August 2014. Commercial production was achieved on October 1st, 2016. Merian includes processing facilities that use a conventional gold mill, primary crusher and processing plant, consisting of a comminution plant, including gravity and cyanide leach processes, with recovery by carbon-in-leach, elution, electrowinning and induction furnace smelting to produce a gold doré product.

Merian has a forward purchase agreement in place with Cyanco International for the provision of bulk deliveries of solid sodium cyanide for process operations. Merian and Cyanco are committed to providing the safest, most secure method of delivery of solid sodium cyanide to Suriname and the Merian site. Solid sodium cyanide is transported from Cyanco's Houston, Texas production plant to Suriname in 18 ton Isotainers are transported to the Port of Houston where they are loaded onto sea-going vessels operated by InterMarine for shipment to the Port of Moengo in Suriname. The predominant method of cyanide transport from the Port of Moengo to the Merian site is Isotainers. Isotainer mode of delivery significantly reduces the risk of leaks, spills, theft, and/or other environmental, health, safety and community issues during transport.

Upon arrival at the operation a caustic solution is pumped through the Isotainer sparging (mixing) circuit to dissolve the briquettes. The mixed sodium cyanide solution is then transferred into the cyanide storage tank. This reagent strength cyanide at 28% concentration is used in the

Leach, Elution and the Gravity Recovery circuits as well as a very minor quantity in the metallurgical laboratory.

Site-specific operational features includes haul trucks transporting the ore from the open pits to processing operations, feeding ore into a series of crushers and grinding mills to reduce the size of the ore particles and expose the mineral. Water is also added, which turns the ore into a slurry. This slurry is sent to leaching tanks, where a cyanide solution is added to the slurry, which leaches gold and silver into the solution. This process removes up to 93 percent of the gold and 70 percent of the silver from the ore. Carbon granules are then added to the solution. Then is performed the “stripping” of the gold from the carbon is performed by washing it with a caustic cyanide solution. The carbon is later recycled. Next, they pump the gold-bearing solution through electro-winning cells, which extract metals from the solution using an electrical current.

After gold has been processed, the tailings are stored in tailings dams, which are lined with impermeable layers. While the cyanide levels in the dam are safe, steps are taken to keep wildlife away from the dams. Over time, the chemicals break down and the solids settle to the bottom so that the water can be returned to the plant to be used in processing.

A gravity circuit recovers coarse gold before it is leached.

Other site-specific operational features include the mill event pond which is solely for runoff water from the process plant and the eastern section of the tailings line corridor. Any water reporting to the pond is abstracted during the next timestep as a water supply to the process plant. This pond is operated to provide a centralized repository for site run-off, a plant makeup water source and minimize pumping around the site.

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 Plan. In the event that CN material is released from the plant containments or pipelines, it would ultimately enter the event pond or TSF (Tailings Storage Facility). Dependent on the location of a cyanide release, the mill event pond and other monitoring locations would be sampled as per the Environmental Emergency Monitoring Plan to assess any potential Weak Acid Dissociable (WAD) CN concentrations prior to discharge of water mill event pond.

A cyanide detoxification circuit has been constructed to reduce WAD Cyanide concentrations in Tailings Slurry to less than 5.0 mg/l. Reclaim water from the TSF decant Pond which has little or no cyanide is recycled back into the process as makeup water.

The grinding circuit composed by one SAG (Semi-Autogenous) mill and one ball mill, are defined as cyanide facilities identified in the operation, among others (those with a concentration of 0.5 mg/l WAD (Weak Acid Dissociable) cyanide or greater). The operation takes the milling facilities into account establishing written management and operating plans and procedures, routine inspection and maintenance programs. In the mills area there is cyanide warning signage, emergency shower/eyewash stations, proper fire extinguishers, and adequate secondary containment.

Among the main components of this mining operation are:

- Open pits;
- Waste rock disposal areas;

- Primary crusher
- Ore stockpile
- Pebble crusher
- Grinding Circuit (Ball Mill and SAG Mill)
- Gravity Circuit
- Pre-Leach Thickener
- Leach Circuit
- Carbon-in-Leach (CIL) Circuit
- Elution Circuit
- Electrowinning and Smelting (Gold Room Refinery)
- Tailings Wash Thickener
- CN Detoxification
- Tailings Disposal line and storage (Tailings Storage Facility or TSF)
- Process Reagent Preparation, storage and distribution
- Treated Water Storage Reservoir (TWSR)
- 53 MW heavy fuel oil power plant
- Four 1 MW light fuel oil emergency backup diesel power generators
- Potable water treatment plant
- Laboratory
- Workshops
- Offices

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 ore is transported to the primary crusher and stacked at the crusher stockpile.

Stockpile to Semi-Autogenous Grinding (SAG) mill

Saprolite and rock ore are 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 & lime are added to 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.

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 or 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 tailing’s thickener. The thickened solids are reacted with Copper Sulfate (CuSO₄) 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 it is soaked with dilute hydrochloric acid to remove inorganic salt buildup then transferred to the elution column.

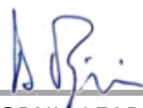
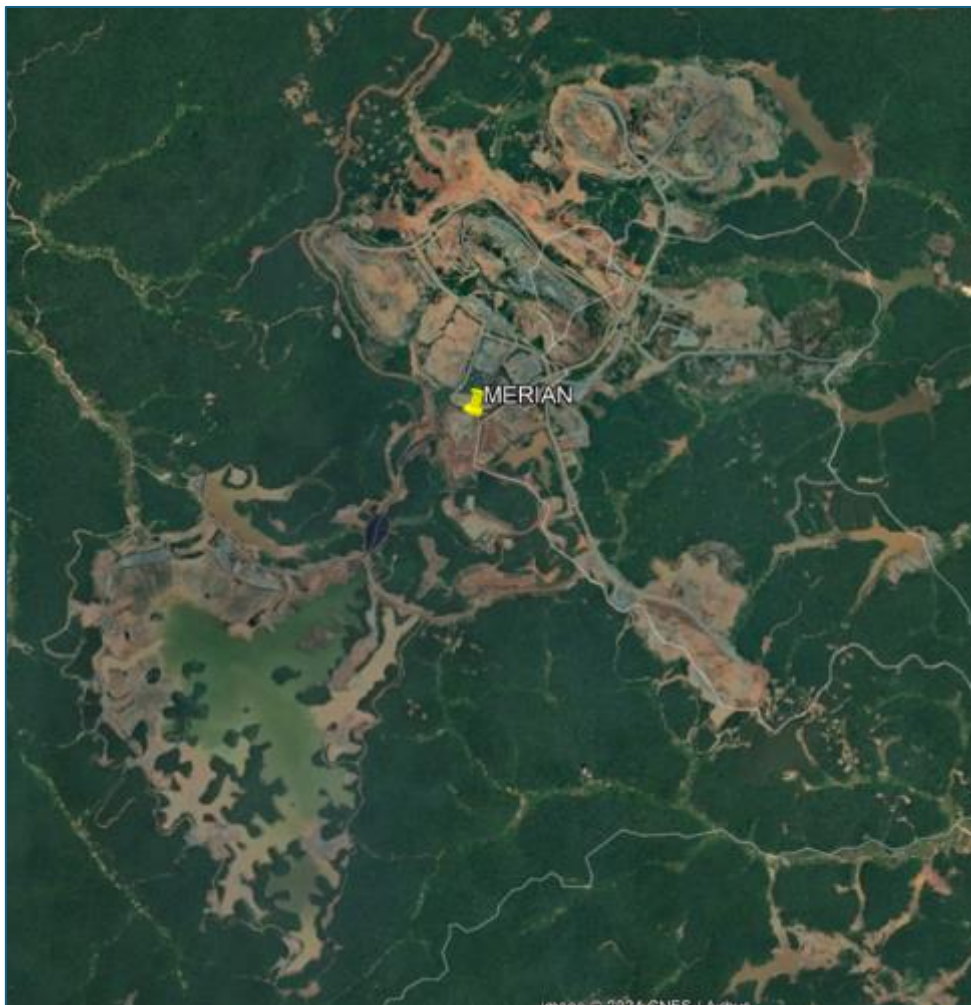
Carbon is treated at high temperature and pressure with cyanide and sodium hydroxide to desorb the gold into a concentrated solution. The concentrated gold solution is pumped to the gold room and the barren carbon is pumped to the regeneration kiln where it is heated in the presence of steam to remove 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

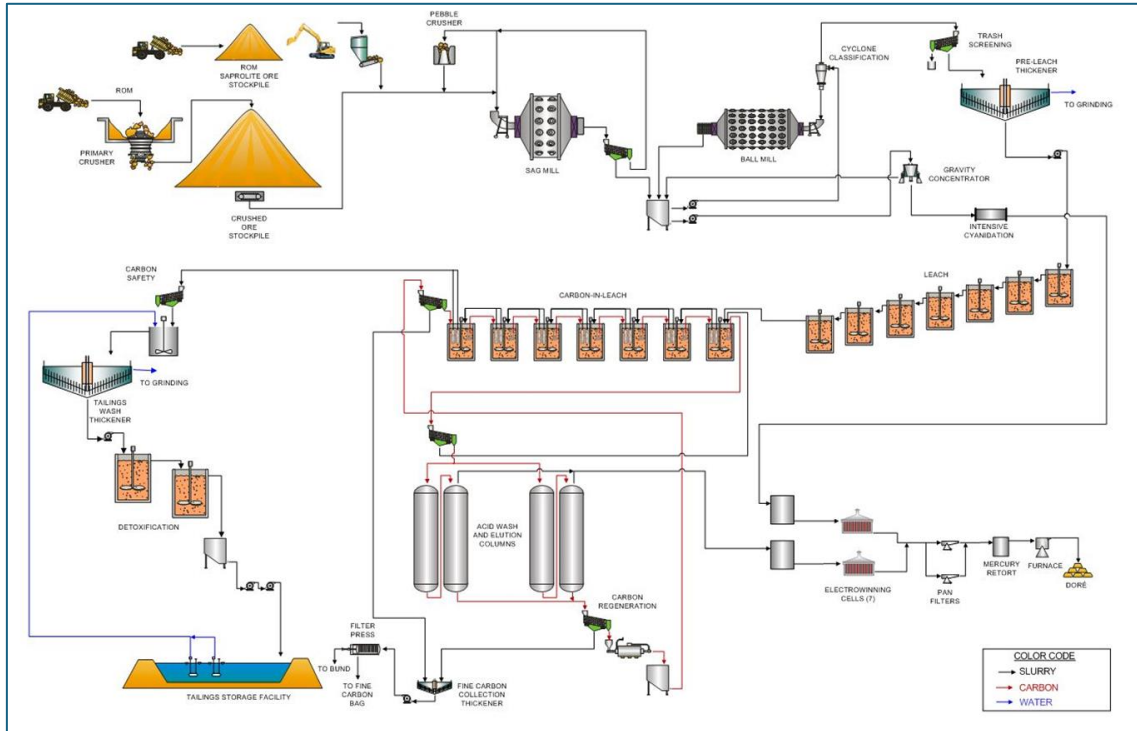
Merian Mine Location Map in Suriname, South America







Process Flow Diagram



Auditor’s Finding

This operation is

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

Compliance Statement

This operation is in Full Compliance with the requirements of the International Cyanide Management Code. This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle.

Auditor Information

Audit Company: Cyanide Auditors S.A.

Lead Auditor and Technical Auditor: Bruno Pizzorni
bpizzorni@cyanideauditor.com

Sign:



Auditor in Training: Jean Lostaunau

Sign:



Audit dates at the mine site: April 15 to April 19, 2024

Auditor Attestation

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

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

PRINCIPLES AND STANDARDS OF PRACTICE

Principle 1 | PRODUCTION AND PURCHASE

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

Standard of Practice 1.1

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

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

Newmont Merian has a current agreement with Cyanco International, LLC – Houston Production Plant (Cyanco) to purchase solid sodium cyanide for the Merian Mine. The agreement requires the facility has to be certified as being in compliance with the Code.

The auditor reviewed the purchase orders, transmittal letters, Cyanco’s commercial invoices, packing lists, bill of ladings, certificates of origin, certificates of quality, safety data sheet (SDS), multimodal dangerous goods form, for all cyanide shipments per year, during the recertification period: November 2020 to April 2024. During this period Merian only purchased cyanide in isotanks, they no longer receive shipments of cyanide in Intermediate Bulk Containers (IBCs). The Supply Chain superintendent was interviewed.

Merian purchases solid sodium cyanide from Cyanco’s Houston Production Plant, a facility four times certified with the Cyanide Code , being last certification in April 2023. The current full certification status of this facility was verified by review of the International Cyanide Management Institute (ICMI) website.

Principle 2 | TRANSPORTATION

Protect communities and the environment during cyanide transport.

Standard of Practice 2.1

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

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

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 identifying the parties in the supply chain. The auditor reviewed bill of lading documentation covering the recertification audit, finding them in conformance.

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

The supply chain from Cyanco production plant to Merian mine is as follows:

- Cyanco is responsible for delivering sodium cyanide product in isotanks from the production plant to the Port of Houston Texas. The rail transport from Cyanco's Plant to Houston Port, is part of Cyanco North American Rail & Truck Supply Chain. The Port of Houston is part of Cyanco Global Supply Chain.
- Industrial Maritime Carriers, LLC (Intermarine) shipping company transports the isotanks by vessel from the Port of Houston to Moengo Port in Suriname, operated by N.V. VSH Transport (VSH).
- Haukes N.V is a transport company in Suriname, which is contracted by Merian to collect the Isotainers at the Port of Moengo and transport them to the mine site.

Solid sodium cyanide is packed in Isotainers for posterior sparge dissolution process on mine site. Each Isotainer tank carries approximately 18 metric tonnes (MT) of solid sodium cyanide in briquettes. Merian is in charge of contracting the road transportation from Moengo 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.

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.

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.

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.

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. Chain of custody records were reviewed identifying each transporter and supply chain component that participate in transporting cyanide at any point on the route from the producer to the operation. The chain of custody records were compared with the listing of certified cyanide transporters on the Cyanide Code website confirming that the cyanide was transported by certified transporters.

- The rail transport from Cyanco's Plant to Houston Port is part of Cyanco North American Rail & Truck Supply Chain, facility four times certified with the Cyanide Code, being last certification in July 2022.
- Industrial Maritime Carriers LLC, (Intermarine) shipping company that transports isotanks with cyanide by vessel from Port of Houston to Moengo Port in Suriname. Intermarine was twice certified with the Cyanide Code, being last certification in April 2024. Intermarine and the Houston Port are part of Cyanco's Global Ocean Supply Chain, four times certified with the Cyanide Code, being last certification in July 2022.
- N.V. VSH Transport (VSH) at the Dr. Jules Sedney Port of Paramaribo and VSH at Moengo Port perform stevedoring of the cyanide shipments. The N.V. VSH ports were last recertified in full compliance in April 2021, as indicated on the Cyanide Code website. The ICMI recently received audit reports with findings of full compliance for the operations' recertification audits conducted in April 2024.
- Haukes N.V trucking company transports cyanide in isotanks from Moengo Port to Merian Mine. Haukes was three times certified with the Cyanide Code, being last certification in June 2023.

Principle 3 | HANDLING AND STORAGE

Protect workers and the environment during cyanide handling and storage.

Standard of Practice 3.1

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

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

Merian has a cyanide mixing area that is designed to operate with Isotainers through a sparge dissolving process, and for Intermediate Bulk Containers (IBC) by mean of a hoist and a hopper to prepare the cyanide solutions as a backup system, which has not been used during the recertification period. 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 cyanide offloading facility consists of the following:

- One 16 m3 caustic mixing tank
- One 70 m3 cyanide mixing (sparging) tank
- One 70m3 cyanide storage tank

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. The entire cyanide offload area and cyanide mixing and storage tanks are constructed of reinforced concrete slab-on-grade (i.e., pad, curbs, parapets, footings and tank foundations).

For the period relevant to this audit (November 2020 to April 2024), Merian only stored and mixed solid sodium cyanide in Isotainers, which are stored in the Process Plant in an open yard at the reagent area. No sodium cyanide in IBCs was stored in the mine site in occasion of the audit, or during the previous 3 years of operation.

The storage area for sodium cyanide Isotainers is located within the Process Plant area. The open yard where the Isotainers are stored, is away from places where people 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.

For the sparge operation during cyanide solution preparation, the isotank is parked over a concreted slab adequately graded and waterproofed, while transferring liquid cyanide to the operation. This concrete slab is impermeable and structurally adequate to withstand the load. Any spill that may occur, particularly when hose connections are made or broken, would be contained and drained to the mixing and storage facility secondary containment and then pumped back into the system. The concrete surface and containment systems were in good conditions.

To prevent the overflowing of cyanide mixing and storage tanks the operation installed level sensors. The cyanide mix tank and storage tank are both fitted with ultra-sonic level indicators and alarms. These level indicators are tied into local electronic displays and can also be viewed by the control room operators on the mill control system. The level indicators are interlocked with the area pumps to prevent the tanks from overflowing.

Standard task procedures for the area require that the operator check the volume of the tank levels before Isotainer sparging commences. In addition, the transfer pumps can only be started by simultaneous activation of the "start" button by the field (local) and control room (remote) operators. The level probes operate interlocks on the process control system and prevent tanks from overflowing.

The cyanide sparging protocol requires that two operators attend all times during cyanide sparging to ensure proper protocols are followed and any spillage or upset conditions are immediately and safely reported and managed.

Both systems for cyanide preparations (Isotainers sparging and 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 70% full or less before receiving more cyanide.

The auditors reviewed the screens of the Process Plant control room how the operator monitors the level controls and that these were functioning on these tanks, and also the control panel in the sparge discharge area.

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 auditors observed that all of these concrete foundations and containment systems were in good conditions.

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

This secondary containment was designed to hold approximately 356 m³ which is 250% of the total combined live volumes of both cyanide mix and storage tanks (the largest tank in the containment bund has a live capacity of 70 m³). This achieves the minimum requirement for 110% capacity of the largest tank in the secondary containment system.

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 system was in good condition at the time of the audit.

At Merian, sodium cyanide is stored considering the following measures:


- a) Impermeability of the sodium cyanide storage is guaranteed as being stored in Isotainers, which technical specifications state is an impermeable and safe container to avoid contact of water with the product. Isotainers have been designed and built to the same standards as those used for bulk liquid sodium cyanide product shipment. The design of the Isotainer incorporates frames welded into the end of the tank with built-in conventional ISO (International Organization for Standardization) corner locking connections for handling and transportation. 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.
- b) The sodium 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.
- c) The Isotainers storage area (full and empty) 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 sodium cyanide solution mixing and storage tanks, are located withing a locked fenced perimeter where only authorized person are allowed to enter.
- d) The sodium 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 Isotainers impermeability prevents any possible lixiviate from it or from other storage in the surroundings to get in contact. No smoking, drinking or eating is allowed within the sodium cyanide storage areas.

Standard of Practice 3.2

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

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 3.2

Merian uses sodium cyanide from Isotainers. There is no stock on mine site of sodium cyanide in IBCs or other kind of packaging different to Isotainers. These tanks are maritime grade reusable containers, property of Cyanco. The only use in its lifetime will be holding sodium cyanide.



Once empty, the Isotainers are rinsed following a Standard Operational Procedure (SOP) related to sodium cyanide sparging, prior to removal from mixing area. After approx. 7 hours of solution circulation, at an average pressure of 120 psi, and a total volume of 300 m³, Isotainers are emptied, depressurized, and visually inspected on the inside, in order to assure that all sodium cyanide has been dissolved and that the Isotainers have no remaining solid sodium cyanide. Isotainers are also rinsed on the inside and on the outside and allowed to drain completely inside bunded area. Isotainers are returned to the storage area, labelled accordingly their current empty content, and then they are removed from site and shipped back to the vendor with the cleaning certificates. Empty Isotainers are rinsed three times according to the SOP, prior to removal from mixing area.

There are no cyanide drums or IBCs used in Merian.

Rinsed Isotainers get a cleaning certificate completed by the supervisor and signed by the general Foreperson. The rinse water is returned to the process. Once the Isotainers are rinsed and after ensuring there is no sodium cyanide residues from outside of the sodium cyanide containers and securely closed, the empty Isotainers are returned to the sodium cyanided manufacturer.

The following measures have been taken at Merian, in order to prevent exposures and releases during cyanide unloading and mixing activities:

- a) The SOPs “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 sodium cyanide from Isotainers; as well as instructions for inspection and operation of critical valves, hoses and couplings related to the addition of caustic soda, raw water, connection with the mixing and storage tanks, and operation of valves and couplings during the mixing. The referenced procedures address the routine maintenance of the hoses, valves and couplings used for offloading cyanide as Merian is responsible for this maintenance.
- b) The SOP “Sparge Isotainer Change out – Mobile Crane” has specific instructions that addresses the safe transport of the Isotainers, in order to avoid damaging or puncturing it, from the storage area to the mixing zone, and during the removal back to the storage area. This procedure requires the use of barricades and tags to isolate the area during the activity. Merian has a heavy-duty stacker, appropriate for the handling of Isotainers and ISO maritime containers.
- c) The sodium cyanide Isotainers are not stacked one over the other, as they are all stored at floor level.
- d) According to the SOP “Housekeeping Cyanide Storage and Mix Area,” any spill during sodium cyanide mixing activities, must be timely cleaned up. Small spills from the sparging process may be expected during disconnection of the sparge hoses. These spills are hosed into the containment area and the solution is pumped back into the process via the cyanide containment bund manually operated sump pump. 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 clean which indicated excellent housekeeping practices.
- e) SOP “Cyanide Sparging” requires personnel during mixing to wear PPE (Personal Protective Equipment) including chemical suit, full- face mask and cartridge suitable for HCN and NaCN, hardhat, rubber boots, chemical gloves and a personnel HCN gas

detector. The SOP “Buddy System” is applicable to all situations where work may be carried out in potentially hazardous circumstances, including sodium cyanide mixing. A sodium 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. The work team for dissolving sodium cyanide was made up of two operators and an external supervisor onsite. Likewise, surveillance is maintained through security cameras of the entire process, from the operations control room. This process can be viewed by any official in the mine who has access to the camera surveillance system.

- f) Cyanco’s solid sodium cyanide in Isotainers comes with the colorant incorporated, in such way once that cyanide solution is colored during the sodium cyanide-sparging process. Interviews with plant operators confirmed that high concentrations of cyanide solutions area color red. Also, the coloration of the sodium cyanide solution was verified by direct observation by the auditors at the point of addition in the leaching tanks.

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



Principle 4 | OPERATIONS

Manage cyanide process solutions and waste streams to protect human health and the environment.

Standard of Practice 4.1

Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures.

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

Merian has written plans and procedures for operating its cyanide facilities in a manner which protects its workers and the environment. Merian has developed a management system in alignment with ICMI standards and other best practices. This system requires operations to identify key risks, develop SOPs 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 developed a series of SOPs that explain 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 in these procedures using experienced supervisory staff and qualified training personnel from the Learning and Development Department.

Maintenance documentation and training are organized by section (circuit) of the plant and its associated facilities. These include:

- Primary Crusher
- Grinding
- Gravity
- Leach
- CIL
- Elution
- Refinery
- CN Detoxification
- Reagents
- TSF
- Metallurgy Laboratory
- Utility Services

Plant operations staff are required to participate in general plant induction and undergo training programs for the various areas of the plant and utilize training manuals 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, other personnel working in the plant area may be trained in awareness and understanding of cyanide and chemical hazards and responsible management.

The following are the cyanide facilities identified in the operation (those with a concentration of 0.5 mg/l WAD (Weak Acid Dissociable) cyanide or greater):

- Mill facilities circuit (one SAG mill, one ball mill)
- gravity separation circuit



- pre-leach thickener (one tank)
- cyanide Isotainers storage area (full and empty)
- cyanide mixing facility (one mixing tank, one storage tank)
- cyanide leach circuit (seven leach tanks, seven carbon in leach [CIL] tanks)
- pregnant solution tanks (two)
- barren solution tanks (two)
- elution circuit
- tailing wash thickener (one tank)
- CN detoxification (one tank)
- mill events pond
- secondary containments, and
- associated pump and pipeline systems for all facilities listed above.

SOPs, work instructions and plans for operating its facilities reviewed were the following:

- SOP – Cyanide Management Plan (MER-IMS.14-TMP02) dated June 2024
- Emergency Plant Shutdown Procedure (MER-PRO-IMS.15-SOP001)
- Merian Emergency Response Plan (MER-HS-IMS.10-M03)
- Emergency Plant Shutdown Procedure (MER-PRO-IMS.15-SOP001)
- Tailings Storage Facility Management Plan (MER-PROSER-S.02-M01)
- Emergency Cyanide Spill Response Procedure (MER-PRO-SOP-001)
- Care and Maintenance Planning Checklist – Environment (NEM-SER-CHK-001)
- Care and Maintenance Restart Checklist – Environment (NEM-SER-CHK-002)
- SOP – Control of Plant Cyanide Addition
- SOP – Maintenance Work Instruction (MER-PRO-IMS.15-xxxxxx)
- Job Hazard Assessment (MER-HS-FOR-014)
- Reagent systems Work Permit (MER-PRO-FOR-006)

In addition, Merian has the following site managing plans:

- Merian TSF and TWSR Operations, Maintenance, and Surveillance (OMS) Manual
- Social Commitments Management Plan)
- Environmental and Social Monitoring Management Plan
- Biodiversity Action
- Site Water Management Plan
- Closure and Reclamation Management Plan
- Waste Management Plan
- Hazardous Management Plan
- Air Quality Management Plan
- Erosion and Sediment Control Management Plan (MER-ENV-PLN-002).

The auditors reviewed these documents, interviewed plant operators, maintenance area and environmental personnel, verifying that Merian understands how to manage cyanide in a manner that prevents releases to the environment and exposures to workers and the community.

These documents are adequate to provide measures to protect human health and the environment as they describe cyanide-related safe work practices. The auditors reviewed the operation's written operating plans and procedural documents confirming that they address the safe operation of all cyanide facilities. Implementation of the listed documents was confirmed through inspection of these activities and interviews with the personnel responsible for performing these activities, and review of available documentation, such as operational and inspection records.

Merian operational plans and procedures provide the link between its design and the necessary operational practices. The site's operating plans and procedures, reference the assumptions and parameters on which the design was based, as well as applicable regulatory requirements related to prevention of cyanide releases and exposures, to allow the operation keep track of why it is operating according to a specific plan. The original Plant Design Criteria was developed by G Mining, Ausenco and Newfields, in coordination with Newmont. These design criteria were based upon Newmont Corporate guidelines and standards, local regulatory and other requirements, documented best practices, and the Cyanide Code. Based in these documents, it has been developed a "Cyanide Management Plan" for Merian.

The plant procedures have been developed and continuously updated for continuous improvement using the original Plant Design Criteria. Critical design parameters are referenced in the original design criteria as well as in various management plans, and SOPs. 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.
- pH operating range is from 10 to 10.5 for cyanide solutions to avoid the formation of HCN gas.
- HCN gas levels at 4.7 ppm (parts per million) requires stop the works until gas levels drops.
- The concentration of WAD CN in TSF discharges.
- Reliability and availability of the CN detoxification system.
- The design storm events for containments and impoundments.
- Safety and emergency requirements.

The auditor confirmed compliance reviewing the operating plans and procedures confirming inclusion of these major parameters, and by interview with personnel responsible for the operation and maintenance of the facility. Personnel showed good awareness of these parameters.

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, and all associated piping and pumps as having contact with cyanide.

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 WAD) cyanide discharge, which should be less than 5.0 mg/L. Operations aim to target < 0.2 ppm to assure compliance with the 5.0 mg/L 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 a database for SOPs 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.

The operation's work procedures and plans listed above addresses those aspects of the operation that are necessary for protection of workers, communities and the environment. Specific items addressed include preventive maintenance programs for critical equipment,

inspection programs for cyanide facilities such as process tanks, pipelines and ponds, operational controls, environmental, health and safety topics, preventive maintenance, water balance, and inspection processes for equipment, secondary containments, environmental media, and wildlife protection, among others. The procedures provide the protocol for managing process solutions and maintaining the associated containment facilities within the process areas (i.e., the containments, pumps, drains and valves) in good conditions, for inspecting the available pond capacities monthly. Specifically, procedures outline the corrective actions required for ensuring that adequate storage capacity is maintained in the emergency pond to retain process solutions during upset conditions. Procedures were available for normal and upset or emergency operating conditions.

Merian has a preventive maintenance for critical equipment managed using SAP software (SAP is the acronym for the original German name of the company: Systemanalyse Programmentwicklung). Preventive maintenance and calibration plans are generated automatically for the specific frequency of the equipment. Work orders generated from inspection forms are entered in the system, including assigned priority.

Daily inspections including pre-start checks are conducted for each shift on each circuit. A checklist is used for each area of the plant to prompt personnel during their inspections. These checklists include prompts for:

- Inspection of integrity of containment areas
- Presence of solution in containments
- Tank inspections for corrosion/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

Identified issues that cannot be rectified immediately are recorded on the inspection checklist and reported to the shift supervisor who will then ensure that a work request is generated for prioritization and execution by appropriate personnel.

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

Inspection findings are documented and retained by the Maintenance 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 auditors reviewed inspection programs and records verifying inspection are performed. Procedures and management plans were reviewed and were found to be appropriate for the operation and fully implemented.

Merian has developed and implemented a Change Management System (CMS) 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. The purpose of the CMS is to ensure that systematic processes are in place to evaluate any changes at the plant so that the risks of incurring negative impacts to people, environmental, property, or product quality are minimized.

The CMS identifies changes to the facility or its operating practices related to cyanide usage or cyanide presence. This way, the hazard that may increase the potential risk for cyanide releases and worker exposures have to be evaluated and addressed before such changes are implemented.

The CMS requires notification to environmental and safety personnel and sign offs by these departments, among others, before the change can be instituted is the best way to address this. The environmental and health and safety reviews are guided by a detailed checklist.

CMS can be accessed via Meriam intranet. The system will allow the log only of authorized personnel on the operation.

Verification was through review of the CMS online of completed procedures that have been signed off by environmental and health and safety personnel, and review of its dissemination through the log records of areas and personnel participant of the process. Also, it was reviewed a not-cyanide related CMS procedure in process, in order to understand the steps followed by the users and the actions required by the system, specifically related to notification to environmental and safety personnel and sign offs by these departments.

Merian has implemented contingency procedures for the process plant including the mill facilities, and TSF to respond to problems identified by monitoring and inspections, and to address temporary closure of the operation. The contingency procedures have been incorporated into various SOPs and management plans at the operation. In addition to these operating procedures, contingencies management documents and procedures are in place to help control the adverse effects from abnormal conditions. The operation's contingency procedures, closure plan and contingencies management documents for temporary closure or cessation of operations sufficiently address how cyanide would be safely managed during such an event. These documents include management of any cyanide on site, such as solid cyanide stored in ISO Tanks, reagent-grade cyanide solution stored in tanks, and lower-concentration process solution within the process facilities, such as tanks, vessels, pipelines, ponds, and impoundments, as well as conducting ongoing facility inspections and required maintenance and water monitoring activities.

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:

- Merian Emergency Response Plan (MER-HS-IMS.10-M03)
- Emergency Plant Shutdown Procedure (MER-PRO-IMS.15-SOP001)

- Tailings Storage Facility Management Plan (MER-PROSER-S.02-M01)
- Emergency Cyanide Spill Response Procedure (MER-PRO-SOP-001)
- Care and Maintenance Planning Checklist – Environment (NEM-SER-CHK-001)
- Care and Maintenance Restart Checklist – Environment (NEM-SER-CHK-002)

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.

Merian's Emergency Response 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.

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

Protocols and procedures related to shutdown of cyanide facilities include the process plant, including the mill facilities, 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 CN Detox system, so cyanide concentration design criteria are 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. Merian inspects the unloading, storage, mixing and process areas, as detailed below:

- a) 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. Operators inspect tanks holding cyanide at the beginning of their shifts (two shifts per day). 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.
- b) During the pre-start check lists, they are included inspections of integrity of secondary containment and presence of solutions or any other materials in secondary containments. The inspection includes a check of the drains to be properly closed and locked, in order to prevent accidental releases to the environment.
- c) Merian 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 tail 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.

- d) During the pre-start check lists, they are included checking pipes, valves, pumps for leaks, checking for presence of cyanide salts, deterioration or leakage. Safety and environmental spill ancillary equipment readiness and HCN concentration fixed detectors are also inspected. These inspection items are also included in the checklists mentioned above.
- e) The TSF is inspected twice a day, through visual inspections and 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 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 are recorded in a TSF log sheet that also covers the tailings pipeline conditions.

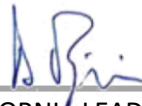
In addition to the shift inspections, a formal inspection program is in place to verify and evaluate performance across process facilities, including cross-functional participation from plant operations, metallurgy, maintenance, environmental, health & safety and security. Process facility inspection records, including the mill facilities, are documented and maintained either in electronic or hard copy format for a period of not less than three years.

Maintenance inspections are carried out on a routine basis according to the scheduled preventative maintenance system. Work orders are generated by the maintenance system (SAP) for the various plant facilities and equipment. Hazard identification procedures including but not limited to job hazard analyses (JHAs) and work permits 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 in SAP, which helps to ensure the action is appropriately managed and completed by the responsible parties. Corrective actions from daily inspections and maintenance activities are also recorded via the work order in SAP to rectify the problem. Records of all maintenance activities are kept for a period of not less than three years by the Maintenance Department.

The inspection program was found to be sufficient to assure that the operation is safe and functioning within design parameters. The auditors reviewed inspections records and verified these are being completed on an appropriate frequency and according to scheduled inspection programs. Also, there were conducted field inspections during the site visit, verifying the condition of tanks, secondary containments, pipelines, pumps, valves and TSF.

Merian conducts frequently inspections, enough to identify potential problems before they present a risk of cyanide release or exposure, according to the "Cyanide Management Plan."

Checklists have been developed to ensure that personnel focus on critical items during their inspections. Checklists include prompts for:



- Integrity of cyanide and process solution tanks, pipelines and valves
- Integrity of secondary containments
- Positioning of drains and valves
- Recovery systems including sump pump operation
- Design and operational parameters for safe and environmentally responsible operation

The weekly cross-functional inspections serve as a management level over-inspection to identify and rectify any problems that have not been identified and/or reported previously.

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.

The documents and records reviewed were found to be sufficient to assure that the operation is safe and functioning within design parameters. The auditor reviewed the inspection records verifying inspections were done in a consistent manner and properly recorded.

Records of audits, 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 items identified 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 depending upon associated risk level. Records of inspections are retained, the auditor reviewed inspections records covering the recertification period and found them to be in compliance as they include the date of the inspection and the name of the responsible of the field inspection, as well as observations, comments and deficiencies found. If the deficiencies are related to maintenance of equipment or facilities, a work order is issued 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.

Work Procedures for cyanide equipment covering electrical, mechanical and instrumentation maintenance as well as the workflow records including identification / scoping / planning and

scheduling of maintenance work were reviewed by the auditor, finding them to be properly documented.

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.

The operation has a Preventive Maintenance (PM) program for its cyanide facilities where a failure can result in a cyanide release or exposure. The program is used to perform the necessary maintenance and inspect the integrity of process equipment, piping and tanks, according to a maintenance program and every time is needed to keep equipment and installations properly working.

Pumps, pipelines, tanks, valves, sensors and safety equipment are all included under the preventative maintenance program. These equipment lists and PM schedules are maintained in the SAP system by process maintenance personnel and are updated as required due to plant changes, incidents, audits 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 PM schedule provides a listing of the equipment along with the planned schedule for maintenance. The PM system is managed using SAP software, which automatically produces PM work orders on an established schedule. The system identifies future activities for regular PM and includes information on the task requirements and completion. The software is used to generate and retain all documentation for programmed maintenance work. Corrective maintenance activities are documented by work orders, which are generated manually and electronically.

The maintenance planner generates weekly planning programs for both mechanical and electrical systems. The planning programs include maintenance inspections, PM schedules, predictive maintenance, lubrication and any corrective maintenance requirements identified by operational and maintenance inspections. Maintenance considers mechanical, electrical and process control areas.

Maintenance inspections incorporate checklists for pumps and valves. Electrical Maintenance performs monthly checks of the automatic tank level indicators and alarm systems installed on the cyanide mixing tank and the cyanide storage tank.

The auditors inspected the cyanide facilities, reviewed maintenance records and interviewed employees, determining compliance with this requirement. The operation maintenance system appears to be sufficient for preventative, corrective and predictive maintenance for safe cyanide operations at Merian.

Merian has a 53 MW heavy fuel oil power plant and four 1 MW CAT light fuel oil emergency backup diesel power generators, plus a battery power backup. 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 set up 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.

SOP "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 provides around 26 MW regularly. 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 the written procedure "Emergency Plant Shutdown Procedure" (MER-PRO-IMS.15-SOP001), in which is detailed the preconditions to launch the generators, and to ensure the leader of the maneuvers by the communication channel is a single person and whoever coordinates with other power plants to avoid accidents or damage to property.

Merian has also 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 blackout. 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 that the last blackout recorded occurred in 2019.

During this onsite audit, maintenance records for the emergency generators were reviewed as verification. These include a summary of power management guidelines for the generators, corresponding work orders, and the powerhouse inspection journal, which documents services performed on the emergency generators. The auditor reviewed maintenance records verifying that the operation maintains and tests this equipment as necessary to ensure that it is functional if and when needed.

Standard of Practice 4.2

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

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

Merian conducts test work for sodium cyanide (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 5.0 mg/L

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. 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 5.0 mg/L 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 Cyanide Management Plan 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 SOP "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 (panel mounted model).

In addition to the afore mentioned free cyanide control analyzers, pulp samples are manually cut, filtered & titrated for free cyanide every two hours from the cyclone overflow, LT#1 and LT#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 WAD cyanide concentrations to between 1 and 5 milligrams per liter (mg/L). The process plant targets 5.0 mg/L 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.

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 Management Plan 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.

The auditor reviewed the records for cyanide monitoring, internal communications and sampling workflow, and by interview with the Superintendent of metallurgy, confirmed Merian has implemented a program to evaluate cyanide use and adjust the addition rate to minimize its use.



Standard of Practice 4.3

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

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

Merian, in coordination with Piteau Associates, 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.
- mill event pond.
- Mining Sedimentation Ponds.
- Other water sources required during drought conditions

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, and national data. The probabilistic water balance considers a 45-year modeling timeframe.

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 water balance meets the requirements of the Cyanide Code. These include considerations for:

- Tailings deposition rates into tailings storage facility
- The design storm duration and storm return interval(s) that provides a sufficient degree of probability that overtopping of the pond or impoundment can be prevented during the operational life of the facility
- The quality of existing precipitation and evaporation data in representing actual site conditions
- The amount of precipitation entering the mill 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 in addition to evaporation, such as the capacity of decant, drainage and recycling systems, and seepage to the subsurface
- The effects of potential power outages or pump and other equipment failures for the emergency removal of water and/or slurry.

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 and power outages, potential for overtopping of the tailing’s 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. Due to the geographical location of Merian, in the Amazon rain forest, snow, snowfall, or freezing and subsequent thawing of waters have not been considered as a model factor.

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 catchment areas. It takes into account the amount of precipitation entering the mill event pond, Treated Water Storage Reservoir (TWSR), 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 m³/h to 1800 m³/h. Currently the cyanide treatment section of the ETP is not operational because of low cyanide concentrations in the TSF water entering the plant.

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 Mm³ 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:

- 1) Water is lost to evaporation, seepage, or entrained in tailings; and
- 2) 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 Mill 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 calibrate 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 in the field, using tablets and the software Monitor Pro. Inspections have been consistent during this recertification period.

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 m³ 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 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 million (MM)m³ of water) plus a freeboard of 1 m.

TSF solution is used for mill makeup water and may be pumped to the Effluent Treatment Plant (ETP) and subsequently to the Treated Water Storage Reservoir (TWSR). 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 2 m 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.

The Responsible Tailings Facility Engineer (RTFE) team monitors stability of TSF dams on a weekly basis and the causeway on a biweekly basis, and also the Environmental department performs ad-hoc 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.

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

Merian has a number of programs in place to monitor and maintain the water balance. Precipitation data is collected via site-based rain gauges. This data is then updated into the water balance model no less than quarterly for calibration. Process metallurgical staff compare updated meteorological data provided by the Environmental 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.

Merian has been comparing predictive vs. real data. 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. Merian has 4 weather stations on site, 3 report online.

The auditor reviewed the water balance model, data records and interviewed the mine personnel responsible for the water balance confirming that the parameters used in the water balance modeling were being continually monitored and maintained as part of the operations, and that this facility is operated within its design parameters.

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
 in substantial compliance with Standard of Practice 4.4
 not in compliance with

Merian has no open waters where WAD cyanide exceeds 50 mg/l. The tailings storage facility (TSF) 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 daytime inspections to monitor the TSF and identify and report any possible cyanide related mortalities of birds or other animals.

Cyanide is securely stored and labeled on site to prevent any misdirected use of cyanide that could impact surface water.

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 5.0 mg/l. TSF WAD CN data is stored in a database and reviewed by the process management team. Any incursions of the 5.0 mg/l WAD CN trigger a response to investigate and correct the upset with corrective actions implemented.

Merian assay laboratory runs the test on the samples using the amperometric method. Also, there is a weekly sample sent to a third-party laboratory (Eurofins – Netherlands: <https://www.eurofins.com/>) for testing Total CN and Free CN. The average Free CN from 2021 to 2024 is < 0.1 mg/l. The average Total CN for the same period is < 1.0 mg/l.

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 LT#1 and LT#3 leach solutions every 8 minutes for free cyanide concentration excursions.

In the absence of analyzer readings, manual free cyanide titrations will be performed every two hours.

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 have an historical tendency to fluctuate between 0.2 mg/l and non-detectable (<0.02mg/l):

- Max. year 2021: 2.16mg/l WAD CN
- Max. year 2022: 0.18mg/l WAD CN
- Max. year 2023: 1.32mg/l WAD CN
- Max. year 2024: 0.20mg/l WAD CN

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 tailing's facility and from the TSF decant pond. WAD CN measurements for the detox effluent are recorded in the site data base system "Monitor Pro." It can be accessed by the Merian intranet by authorized users. The auditor also reviewed the document "TSF_Pond_WAD_Cyanide_2021-2023.xlsx" for verification of historical data.

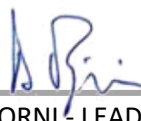
Operational checklists at the TSF require that routine checks are done for wildlife mortalities inside and in the surroundings of the TSF. In addition, any wildlife mortalities identified at any area of the mine are recorded as environmental accidents and investigations are conducted to ascertain the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

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 5.0 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 tailing's 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 related or not with cyanide. The Environmental department has a grid field inspection model 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, finding a consistent record over time, finding no register of dead animals related to cyanide intoxication in 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
 in substantial compliance with Standard of Practice 4.5
 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 cyanide detoxification system aims to achieve a tailings box discharge of below 5.0 mg/l. Supernatant in the TSF is used for mill process water but can be pumped (seasonally) to the Water Treatment Plant (WTP) to reduce solution volumes in the impoundment and eventually to the Treated Water Storage Reservoir (TWSR) 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 1,800 m³/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, sulfuric acid, 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 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.

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.

If the operation has to proceed with a direct discharge to surface water, a Compliance Team must generate a "Discharge Permit." In recent years, no water release has been required or performed. On the contrary, the treated water has been stored in the TWSR to be reintegrated into the process, given the lack of water during the last dry seasons.

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 Plan. In the event that CN material is released from the plant containments or pipelines, it would ultimately enter the event pond or TSF. Dependent 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 results of laboratory tests run by Eurofins indicate Free CN < 0,0019 mg/l.

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 Plan in line with the regulatory requirements. The Environmental Monitoring 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 has 18 Embankments (eight Main dams (MD-1 through MD-8), five Saddle dams (SD-1 through SD-5) and five berms (B-1 through B-5)); Main Dam 1- 6 has a seepage collection system, MD7-8 has monitoring wells; 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 being pumped back into the TSF in 2019, due to the remarkably high quality of the water collected. The quality of the water has remained consistently good, so this policy of not pumping it back to the TSF has been maintained during the recertification period.

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 < 0.001 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. Remediation activities would be dependent on the concentration and location of the discharge. The SOP "CN Emergency Spill Response" 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, 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(s).

Standard of Practice 4.6

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

The operation is in full compliance with
 in substantial compliance with Standard of Practice 4.6
 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. Sections 3.1 and 4.7 of this report 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 Plan. Water from the seepage collection stopped being pumped back into the TSF in 2019, due to the remarkably high quality of the water collected. 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 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.

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.

A series of thirty-two 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 does not use mill tailings as underground backfill. The mine has no current underground mining operations.

Merian Environmental personnel monitor groundwater for a variety of parameters including cyanide to protect human consumption use, which in Suriname is drinking water (since there is no specific legal requirement for seepage 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.

Standard of Practice 4.7

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

The operation is in full compliance with
 in substantial compliance with Standard of Practice 4.7
 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 Isotainers, which due to their construction characteristics and technical specifications provide a competent barrier for spill prevention. Isotainers 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 including the mill facilities is contained within a concrete pad, including the mixing (Isotainer 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 tail's 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 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 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 m³. 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 m³. 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 m³. The noted gravity drainage systems connecting the concrete containment areas (including the pre-leach thickener containment) to the mill event pond are constructed with RoadCem to create a non-permeability layer. The auditor reviewed a memo from AMB, the roadcem product provider, dated September 2022, stating " RoadCem is specially designed additive for applications in soil, road construction and in water works. It is a fine powder like substance that enables the bonding of nearly any type of material to form pavements." Merian also provided the document "Cement Stabilized Materials with Use of RoadCem Additive," which states RoadCement reduces the permeability.

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.

The Merian Process Plant secondary containment facilities including the mill facilities are operated as zero-discharge facilities. Water collected in bunded areas is either pumped out via automated area sump pumps where it can be returned to the process or it drains to the event pond via interconnected bunded areas where it is tested and can be transferred back to the process facilities.

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.

SOP “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 process solution tanks at Merian have been designed with secondary containment in accordance with Newmont Corporate Guidelines and ICMI requirements for Cyanide Management. There are no tanks in Merian without 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 5.0 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.

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 detailed in section 4.8 of the current audit. 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.

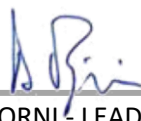
Standard of Practice 4.8

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
 in substantial compliance with Standard of Practice 4.8
 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.

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 require signoffs 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.

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 19, 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, and surface and groundwater quality.

The operation is in full compliance with
 in substantial compliance with Standard of Practice 4.9
 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

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 Ex 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. The Environmental Monitoring and Management Plan specify quality assurance and quality control requirements for cyanide analyses.

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 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 ad-hoc 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 5.0 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 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
Surface water	Weekly, monthly
Ground water	Monthly, quarterly
Wildlife mortalities	Daily
Plant final tailings	Four per shift



Principle 5 | DECOMMISSIONING

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

Standard of Practice 5.1

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

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

Merian has developed the document MER-ENV-PLN-00 “Closure and Reclamation Management Plan” and a “Closure and Reclamation Management Plan for TSF”, in accordance with the Newmont Corporate document NEM-TES-STA-022 “Newmont Corporation Closure and Reclamation Standard” (NCRS) and as part of the “Environmental and Social Impact Assessment” (ESIA). Included in these plans are decommissioning activities for cyanide facilities. These include:

- 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 “Closure and Reclamation Management Plan” contains numeral 7.2.10 “Facilities demolition,” which includes numeral 7.2.10.1 “Process and power plant,” which in turn includes the section “Cyanide facility decommissioning.” The current update of this plan is December 2023. 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 documents related to the NCRS consider decommissioning strategies for the cyanide facilities and treatment systems which may be cyanide bearing, including the mills, pre-leach thickener, leach and CIL tanks, tails thickener, elution and electro-winning, process water tank, CN Detox plant, tailings and reclaim pipelines, ETP, TSF, mill event pond, and TSF seepage collection system.

The current TSF is considered to reach its maximum design capacity on the first quarter of 2028. There is a current “TSF-1 Closure IPS Schedule” document, dated January 25, 2024, which is in continuous update due to the proximity of the end of life of TSF-1.

The water in the TSF and TWSR will continuously be monitored for cyanide and other relevant parameters for 20 years. 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, as part of the ESIA. These activities are

developed and updated in coordination with the NCRS plans 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 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 after processing has ceased and activities beyond the first year after closure is completed. The sequence of decommissioning activities is shown with reference to years prior and after processing has ceased, rather than calendar years.

NCS related 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 life planning and associated decommissioning costs, activities and responsibilities. These plans are also included in the master document control schedule of the Environmental Department and indicates that it should be reviewed and updated.

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

The auditor reviewed the "Closure and Reclamation Management Plan" and the "Closure and Reclamation Management Plan for TSF," confirming they include written aspects to conduct the mine closure necessary activities, including the ones applicable to the cyanide facilities.

Standard of Practice 5.2

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

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

"Newmont Closure Standard" related plans 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-ARO 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.

Merian is required by Newmont's corporate policy to update the estimated closure plan cost on at least an annual basis which addresses decommissioning and closure cost for the entire mine, including all cyanide infrastructure.

The operation has a cost estimate based on rates applicable to labor and equipment quotes from external contractors. The cost estimate includes line items for site cyanide-related decommissioning activities and corresponding costs. The auditor reviewed the last version of the cost estimate "Estimated Closure Costs" elaborated by Arcadis, based on contractor's prices. With the current estimates of useful life of mine, it is considered:

- Year 2038: formal end of mine
- Years 2039/2040/2041: decommissioning process
- Years 2042 to 2062: post closure monitoring

The current amount considered for decommissioning of the whole plant is estimated in US\$ 4 MM, and for the whole site in US\$ 198 MM.

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.

Merian has established a letter of credit as the mechanism to cover the estimated costs for closure and reclamation. In accordance with Section 19.4.2 of the Mineral Agreement, Newmont 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 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 Bank of Nova Scotia / Scotiabank (Canada) to the Suriname government, for US\$120 MM. 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. The last update of this letter of credit was on February 16, 2024.

Principle 6 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

Standard of Practice 6.1

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

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

Merian has developed and implemented a number of SOPs for the tasks that require management of cyanide. These include procedures for unloading, mixing, for the mills, the plant operations, and equipment decontamination prior to maintenance. The operational procedures focused on the mine operations include those reviewed under Standard of Practice 4.1, which the auditor determined they describe cyanide-related safe work practices.

For more general activities which apply across various areas of the plant and/or the mine operation, work permit systems have been developed. These include, for example, Lock Out/Tag Out/Try Out, Hot Work and Confined Space entry permits. These SOPs and permits are available in the site document control center and are developed and maintained by the Process and the Health & Safety (H&S) departments.

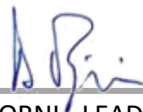
Process plant SOPs specific to various operating facilities and circuits are supported by specific training conducted by competent operators and/or designated Technical Training (TT) personnel and complemented by training modules.

The SOPs 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 SOPs detail task specific requirements, minimum training requirements to conduct the task, and procedures to follow in case of a contingency. Verification of the SOPs 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.

The SOPs are available through the intranet with the original approved and signed documents maintained by the H&S Department. SOPs related to cyanide operations are, i.e.:

- Cyanide Offloading Checklist (MER-PRO-IMS-08-CHK0)
- Reagents Pre-Start Checklist (MER-PRO-CHK-007)
- Cyanide Storage Facility Checklist (MER-PRO-CHK-020)
- Leach & CIL Pre-Start Checklist (MER-PRO-CHK-005)
- Thickener and Water System Pre-Start Checklist (MER-PRO-CHK-008)
- Gravity Circuit Pre-Start Checklist (MER-PRO-CHK-004)



- Cyanide Detox and Final Tails Pre-Start Checklist (MER-PRO-CHK-011)
- Other SOPs related to H&S but not related to cyanide are, i.e.:
 - Work at Heights
 - Lock out / Tag out / Try out
 - Moving Machinery Protection
- Hot Works Permit
- Confined Space
- Hazard Communication
- Job Hazard Analysis
- Monitoring and Medical Surveillance
- Occupational Health Program

These procedures describe risks associated with specific work tasks and the precautions and safety equipment required to safely complete the tasks. This requirement was verified through review of documented procedures and discussion with personnel from H&S and Plant Operations areas.

Merian SOPs 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.

During pre-start checks, operators are required to identify whether they have the required 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, obtain a Work Permit, 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 particular, PPE with a higher level of respiratory protection is considered according to the potential level of exposure to HCN in the workplace or in the operation to be carried out. Also, PPE with a higher level of chemical contact protection is required, related to a higher potential of direct exposure to solid or solution sodium cyanide (body, hands, eyes, feet). The use of PPE is complemented with the use of a portable gas monitor for HCN.

Special works will require a JHA, a work permit, and usually the application of specific SOPs, as well as special PPE and equipment, i.e.: multi gas detectors (including lower explosive limit [LEL] and percentage of oxygen [O₂]) in the working atmosphere, lifelines, body harnesses, means of entrance and exit, positive-pressure respiratory filtration protection, air-line supplied air respiratory protection, self-contained breathing apparatus (SCBA) respiratory protection, atmosphere ventilation, and others.

The H&S area has developed a matrix of PPE required for the whole mine, including cyanide related facilities. Observations during the audit confirmed that hard-hat, hearing protection, rubber boots, rubber gloves, and chemical suits were in use for tasks that were performed involving direct or potential presence of cyanide or HCN. The area that requires the most advanced protection against cyanide on a regular basis is the sodium cyanide solution preparation area. The operators for this area are required to use:

- Chemical resistant suit
- Chemical resistant gloves
- PVC steel-toe boots
- Chemical seal between suit, boots and gloves
- Hard hat
- Full face mask with gas and particulates canister (ABEK grade)

A: Indicates the capacity to filter organic gases and vapors with a boiling point higher than 65°C.
B: Refers to the filter for inorganic gases and vapors, such as chlorine, bromine, sulfur dioxide, hydrogen cyanide, among others.

E: Refers to the filter for acid gases and vapors, such as sulfuric acid, nitric acid, hydrochloric acid, among others.

K: Indicates that the filter is capable of trapping ammonia vapors and amine derivatives.

In the rest of the plant, the guidelines for respiratory PPE use are the following:

- Under 4.7 ppm of HCN, no respiratory protection is required
- Over 10 ppm of HCN, is required to evacuate the area. Emergency responders will be required to use Self-Contained Breathing Apparatus (SCBA) respiratory protection equipment if necessary.

This requirement was verified through review of documented procedures, review of PPE delivery files to workers, pre-work check lists, work inspections, work safety analysis and work inspections records, work permits records, historical record of calibration of gas monitors, and discussion with personnel from H&S and Plant Operations areas. Operators and maintenance personnel in the different process areas were interviewed and demonstrated knowledge and good awareness of what PPE has to be used in work areas with cyanide presence, as well as issuing pre-work checklists, work safety analysis and inspections, and soliciting work permits to the appropriate supervision or management levels on each work area when required.

Workers at the operation are given the opportunity to provide input to procedures via a variety of mechanisms. Comments for improvement are directed to supervisors and/or management for consideration. Merian obtains employee input regarding its health and safety procedures and considers this input in developing and evaluating its procedures. Methods include the pre-shift meetings (5-minute talks), training sessions, incident investigations, and JHA and work permit issuing.

During the pre-start meetings there is direct communication between operators, supervisors, and first line area managers, where worker input is considered to improve existing procedures. Records of the pre-start meetings conducted in the last years, including discussion of safety issues related to cyanide, were reviewed by the auditors.

In the pre-operational check lists and inspections check lists, the workers can include notes, which can be issued related to H&S observations and improvement opportunities identified in field operations. The auditors reviewed a sample of check lists related to cyanide operations. Although there were find no notes related to cyanide, it was evidenced that the workers do include written notes in these documents to provide feedback on their field observations.

Between the operators, they are designed "H&S Ambassadors." These persons represent all the workers in meetings with general management and senior management staff, in which they have the opportunity to express concerns, observations and suggestions related to H&S.



Merian senior management conducts town hall meetings four times per year, with the participation of all employees. These meetings set the opportunity for the management to meet and interact with their employees and share mutual concerns and ideas related H&S, among other topics of discussion.

Merian's communication department has also implemented "Suggestion Boxes," in case any person in the operation wants to express an opinion or a concern anonymously. This is also a communication channel for workers to express concerns, observations and suggestions related to H&S.

New and revised documents go through a review procedure which may include feedback from area operators with significant experience in that area. Procedures related to cyanide management are reviewed and/or updated periodically with the participation of process operators. Comments are incorporated and then updated procedures are disseminated to the supervisors for review with the crew for final review and implementation.

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

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

General cyanide safety training, as well as in specific cyanide safety trainings for operational working areas, are conducted to disseminate the updated procedures. Feedback is provided by the workforce during those sessions. Records of input from workers and records of training sessions were reviewed by the auditor and were found to be complete.

This requirement was verified through review of documented procedures, work inspections, JHA and work permits, as well as through discussion with personnel from H&S and Plant Operations areas. Operators and maintenance personnel from the different process areas with cyanide or HCN direct or potential presence were interviewed, and they stated that they maintain a constant dialogue with their supervisors and managers regarding H&S at work, and consider that their opinions are listened to, valued, and used in the process of continuous improvement of procedures and operations.



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
 in substantial compliance with Standard of Practice 6.2
 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 soda solution is used to dissolve solid sodium cyanide briquettes. The caustic soda solution tank is filled and dissolved 1 mt of caustic soda. The pH of the solution in the mixing tank prior to the sparge process is 12, and the pH of the cyanide solution in the storage tank is 11.5.

pH probes in the 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 and maintain optimal pH level control in 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.

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.

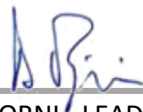
The Control Room continuously monitors the pH at the cyclone overflow, CIL tank #1 and the CN Detox tank. The other pH readings are collected manually. The cyanide mix tank does not have a pH meter because there is a set volume of caustic and sodium cyanide sparged together every mix event that controls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

This requirement was verified through review of SOPs, plant daily operating logs, control room operating logs, and discussion with personnel from H&S and Plant Operations areas, together with the revision of Standard of Practice 4.1. Observation of a cyanide mixing event confirmed that the mix tank was filled with a mix of barren and caustic soda solution prior to initiating the sparge process with sodium cyanide in the Isotainer.

In collaboration with Occupational Health/Industrial Hygiene Programs, Merian has established a number of high-risk areas where exposure to HCN gas may occur according to the CYANIDE CODE requirements:

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

HCN monitors around the plant are calibrated to alert personnel to HCN gas in the area when it exceeds 4.7 ppm and above 10 ppm.



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.

A total of 15 (fifteen) fixed HCN detectors are installed in these potentially high-risk areas to alert personnel to possible HCN gas exposure. Fixed HCN gas detectors have two alarm levels:

- 4.7 ppm – a flashing strobe is activated locally and an alarm shows in the control room on the mill control system alerting to possible high HCN gas in the area.
- 10 ppm – a flashing strobe and local audible alarm with alarm in control room on the mill control system. At this point, personnel must evacuate the area and verify with the control room that they have done so.

Alarm thresholds (4.7ppm & 10ppm) are hardcoded in the PLC. These alarm thresholds will trigger an alarm on 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.

In the case of respiratory protection, the highest potential exposure working positions is in the cyanide mixing area, during the sparge process. For this operation, workers are requested to use negative-pressure full face protection with canister. All the filtering respiratory protection PPE fulfill the European Standard EN 14387:2022 (Respiratory Protection Devices) and are of the brand MSA . All the filtration respiratory protection PPEs are authorized for use up to 50 ppm of HCN, or 50 mg/m³ of sodium cyanide. On atmospheres with direct or potential cyanide presence higher than these values (usually on emergency response cases), it will be required the use of a SCBA equipment, as well as a higher level of physical protection, either encapsulated or semi-encapsulated, with high chemical resistance suits.

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.

This requirement was verified through a review of procedures, review of the record of delivery and replacement of PPE to workers, and task observation during a sparge process on the mixing area, as well as through discussion with workers and personnel from H&S and Plant Operations areas.

The areas listed above in this Standard of Practice outline the key risk where HCN gas may be generated. Where exposure to harmful concentrations of cyanide is possible, Merian has provided alarms, protective equipment and signage to remind personnel of the possible exposures and prevent them from exceeding recommended exposure limits of 10ppm HCN on instantaneous basis and 4.7 ppm on a continuous 8-hour period. Merian uses continuous atmospheric monitoring for HCN in the 15 areas listed. In this case, they are installed Dräger

Polytron 8000 fixed gas detectors. The technical measuring limit for the fixed gas detectors, is up to 50 ppm for HCN (NIOSH IDLH [Immediately Dangerous to Life or Health]).

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 exposure.

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.

The portable gas detectors are of the brand “Industrial Scientific” (www.indsci.com). They are two models of gas detectors used in Merian:

- GasBadge Pro Single-Gas Monitor (www.indsci.com/en/gas-detectors/single/gasbadge-pro), and
- MX6 iBrid Six-Gas Monitor (www.indsci.com/en/gas-detectors/multi/mx6-ibrid)

The first one is a single gas monitor for personal use, with a HCN sensor. The second one is a multi-gas detector, used for more complex operations (such as confined-space entry), and has sensors for lower explosive limit (LEL), O₂, SO₂, NH₃, CO, and HCN. The multi-gas detectors are assigned to each area shift supervisor or H&S supervisor. The technical measuring limit on each case for the portable gas detectors, is up to 30 ppm for HCN.

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.

This requirement was verified through a review of SOPs, review of the record of equipment’s inventory, record of equipment’s calibration log, observation of tasks during inspections at the plant (sparge process in mixing area), plant inspection, and discussion with workers, as well as with personnel from H&S and Plant Operations areas.

Merian employs both fixed HCN detectors and personal HCN monitors. 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 SAP system to automatically generate the work request.

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, gas calibration units 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 kept by the Health & Safety department.

Merian has around 125 personal single-gas handheld HCN monitors. These gas detectors pass a gas calibration on a weekly basis, and a bump test on a monthly basis. A sample of gas detectors was reviewed for the time period of the recertification audit, in order to check their records of maintenance, finding consistency on calibrations and test historical records, as well as in sensor and battery replacements. H&S area retains a digital and a hard copy of the calibration records for the HCN monitors (fixed and portable). These records will be retained for at least 05 (five) years as hard copies, and a permanent record as digital copies. This requirement was verified through a review of procedures, review of the record of gas monitor detectors inventory, records of equipment's calibrations, work tasks observation during calibration process, and discussion with personnel from Electric and Instrumentation (E&I) for fixed gas detectors, and personnel of the Process Safety Training group for portable gas detectors.

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 are 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. This requirement was verified through site inspection and review of physical positioning of information, awareness and alert signs. Also, it was reviewed the plant risk map, and the checklist of signs deployed by operational area, and complemented through discussion with personnel from H&S and Plant Operations areas.

High strength cyanide solution is dyed in red color for clear identification when observed out of proper containment and for clear differentiation with other solutions or rainwater that may be present. Dye is sent with the cyanide briquettes inside the Isotainers set by Cyanco. So, at the sparging operation the high strength cyanide solution results colored in red, in a concentration that provides a clear visual indicator of the presence of high-strength cyanide solution.

This requirement was verified through review of technical documentation related to sodium cyanide characteristics provided by Cyanco, direct observation on cyanide solution dosage in LT#1 and LT#3 and complemented through discussion with personnel from H&S and Plant Operations areas.

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 and other chemicals. 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. In addition to the daily checks, routine preventative maintenance on the showers is completed by the process maintenance personnel no less than quarterly.

There were observed emergency showers with built-in eyewash stations in the cyanide mixing area, in the caustic soda mixing area, in the reagents' preparation area, in the cyanide storage tank area, on ground level and in the platforms area on top of lixiviation, thickening and clarification tanks, and in the tailings filtering area, CN Detox area, TSF area, as well as in the mills area. There were also found stand-alone portable eyewash stations installed in indoor areas on the plant, near control room, hydrometallurgical circuit and tailings filtering area. These additional eyewash stations were located on spaces or corridors where there are no water pipes, spaces and corridors that are difficult to access, isolated or far from other security installations, and in the areas where workers change their PPE. Emergency showers and eyewash stations are built and operated under the ANSI/ISEA Z358.1 Standard (American National Standard for Emergency Eyewash and Shower Equipment).

To protect against fire, only dry chemical powder fire extinguishers are used in the plant, in order 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 H&S 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 of annual fire extinguishers inspections and maintenance. Fire extinguishers are also inspected and tested on a monthly basis by an external contractor. The dry-chemical portable extinguishers comply with National Fire Protection Association (NFPA 10): Standard for Portable Fire Extinguishers.

This requirement was verified through physical inspection during the plant visit, checking the proper operation of the emergency showers and eyewash stations, as well as the location, availability of access and validity of use of the dry chemical powder extinguishers distributed within the plant. Also, it was reviewed the plant risk map, the checklist of emergency showers, eyewash stations, and fire extinguishers, and complemented through discussion with personnel from H&S and Plant Operations areas.

Merian identifies with appropriate signs and labels all the areas with actual content or presence of sodium cyanide, as solid or liquid, to ensure that individuals that may come into contact with cyanide can be alerted of its presence. This includes:

- Sodium cyanide storage area
- Sodium cyanide mixing sparge area
- Lixiviation and CIL tanks, and all hydrometallurgical circuit tanks and piping with potential content/presence of cyanide.

Labeling provide workers and others with notice that a dangerous material is present as necessary to protect their health and safety. 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. Pipes containing cyanide (high or low concentration) are marked as containing cyanide solution or barren solution, and 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.

Cyanide mixing and storage tanks, as well as process tanks, are marked as containing cyanide. Signage of confined spaces are also placed on cyanide tanks. The auditors followed the cyanide

solution circuit from the cyanide mixing area, the process plant area and pipelines transporting tailings to the filtering area

This requirement was verified through site inspection and review of physical positioning of information, awareness and alert signs. Also, it was reviewed the plant risk map, and the checklist of signs deployed by operational area, and complemented through discussion with personnel from H&S and Plant Operations areas.

Merian maintains Safety Data Sheets (SDS) for all chemicals on site, including for sodium cyanide as solid and as solution. Employees have access to SDS and information on cyanide intoxication first aid in areas where cyanide is used and particularly where reagent-strength cyanide is managed. Hard copy documents and/or permanent stands are maintained locally for the operators' preparation dressing room area, cyanide mixing sparge area, cyanide Isotainers storage area, control room, as well as in areas at the hydrometallurgical process plant where cyanide presence is possible. Sodium Cyanide SDS are also available in medical first aid kits and at the medical clinic; and is referenced in the operational procedure for Cyanide Emergencies and Cyanide Intoxication, which are part of the Merian Emergency Response Plan (MER-IMS.A4-TMP04).

SDS information is provided by Cyanco. Sodium cyanide SDS complies with ANSI Z400.1/Z129.1-2010 standard "Hazardous Workplace Chemicals – Hazard Evaluation and Safety Data Sheet and Precautionary Labeling Preparation", as well as with the Globally Harmonized System of Classification and Labelling of Chemicals (GHS Rev. 9, 2021, United Nations Economic Commission for Europe).

Cyanide warning signage has been placed all around the hydrometallurgical plant. This signage provides information on the characteristics and hazards of cyanide; effects of exposure to various levels of cyanide, the symptoms of cyanide exposure; and the precautions, protective personal equipment, and safe practices required to be followed. All these information is in English and Dutch, the languages of the workforce. Verification was conducted by visual inspection of printed materials included in the binders.

This requirement was verified through site inspection and physical review of information available for the workers along the cyanide warehouse and hydrometallurgical plant and complemented through discussion with personnel from H&S and Plant Operations areas.

In the event of any H&S incident, including any with a cyanide exposure, the ENABLON system (www.wolterskluwer.com/en/solutions/enablon) is used for event reporting and investigation. The access to the system is through Merian intranet for authorized users. The ENABLON system allows the reporting of incidents, indicates the procedures to follow, allows the escalation according to the severity of the incident, and allows rapid and effective communication and contact with relevant stakeholders across Newmont, according to the type and magnitude of the event. This system handles the notification process, indicates the administrative process to follow, enables the investigation and evaluation of the event (with tools like "5-why" and "Essential Factors"), and gives an effective follow-up to the corrective actions. Part of the objectives form this system 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. The use of this systems fulfills the requirements of SOP "Event Detail" (MER-HS-IMS-09-F01). This system is linked with the Newmont Event Reporting and Significant Potential Event (SPE) program, ensuring adequate level of management review.

No significant cyanide-related accidents have occurred at Merian during the recertification period. The auditors reviewed the ENABLON system, as well as records of past investigations. The auditor reviewed the incident report records, including incidents not related to cyanide, confirming that the operation is implementing a general program for incident investigation.

This requirement was verified through revision of documented procedures, incident investigation records and registries, online review of the ENABLON system with an authorized user, as well as with interviews with the workers and discussion with personnel from H&S and Plant Operations areas.

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 in substantial compliance with not in compliance with Standard of Practice 6.3

Merian is prepared to respond to cyanide exposure emergencies with effective response procedures, proper equipment, and trained personnel. The operation has the necessary equipment for emergency response to a worker exposure to cyanide, initiation with first response on field, and then receiving a second response based on the technological and professional resources available in the medical center inside the operation.

Merian employs a variety of medical emergency response equipment to ensure effective response to any possible exposure scenarios. This equipment includes:

- Oxygen resuscitation kits (Oxy packs)
- Resuscitation bags
- MicroVent Emergency Resuscitators (pneumatically powered ventilatory resuscitation device)
- AEDs (Automatic Electric Defibrillators)
- Secretion aspirators
- Heart rate monitor
- Blood pressure meter
- Blood oxygen saturation meter
- First aid stations
- Eye wash stations and emergency showers
- Crash cart
- Cyanokits (5g B₁₂ vitamin [Hydroxocobalamin] injectable cyanide intoxication antidote)
- Motorola radio communication system

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.

Alongside the operation, next to the emergency showers, there are implemented emergency stations with trauma kits, including first aid kit, stretchers, cervical collars, oxygen and burn kit. The portable oxygen tanks are of 0.5 m³ of capacity and are provided with sterile masks and a jockey valve regulator that allows up to 6 liter per minute oxygen dosage. There is an emergency station with this equipment next to the unloading area, outside the cyanide warehouse. No antidote is deployed outside the medical center.



The locations of the emergency equipment were deemed to be appropriate for the operation. The Cyanokits are kept only in the medical clinic, and under controlled temperature and humidity storage. This is because only a medical doctor can administer the Hydroxocobalamin antidote. The plant is less than 150 meters away from the medical clinic. Operators are required to carry a radio while performing their tasks.

In the medical center, the operation has available Automated External Defibrillators (AED) resuscitators available and cardiopulmonary resuscitation (CPR) life face masks (resuscitation bags) that can be used with medical oxygen to resuscitate patients that are not breathing. Safety equipment includes Cyanokits, fresh water, oxygen, resuscitators, blood pressure and oxygen saturation meters, stretchers, ambulances, radios and telephones. All operators in the process area have radios during their daily activities, which can get rapidly online through radio communication with the medical center 24/7, using channel 2.

Two full-equipped ambulances are located at the medical center on mine site, which can be used for intoxicated evacuation and life support if needed.

It is important to consider that the medical center in Merian, is managed by a third-party service provider, "Health Control Services" (<https://hcs.sr/>). They have developed written procedures for managing the medical center, attend to different kind of medical emergencies, including cyanide intoxication and chemical burning, equipment's checklists and maintenance programs, and use and maintenance of the ambulances. They are also responsible for providing all the specialized medical staff.

This requirement was verified through site inspection, considering review of the medical center equipment checklists and physical review of equipment and infrastructure, review of the plant risk map and checklists of emergency response equipment deployed in the plant, review of procedures from Health Control Services for medical center and ambulances, interview with onsite doctor and nurses, interview with plant workers, and complemented through discussion with personnel from H&S and Plant Operations areas.

Merian regularly inspects the cyanide first aid equipment to make sure it is available 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 Cyanokits (storage requirements and expiration dates), Oxy-packs, and the ambulances. The response equipment and inspection frequency is maintained in the site emergency response equipment register.

The Health & Safety department is responsible for the procurement of Cyanokits and all the equipment and supplies required by the medical center, including medical-grade oxygen. The Cyanokits replacement is required six months before the expiration date.

Cyanokits are stored at the on-site clinic under the conditions directed by their manufacturer, and replaced on a schedule to ensure that they will be effective when needed. No antidote or injectable medical element, as well as medicines or pills, is found outside the medical center, and only the doctor or nurse on duty is the only technically and legally authorized personnel to apply these elements.

Additionally, two Cyanokits are kept at the Moengo Clinic (Polikliniek Moengo) and two in the Academic Hospital in Paramaribo (Academisch Ziekenhuis Paramaribo). Medical staff in both

places have been instructed by Health Control Services' medical staff on how to administer the Cyanokits. The Port of Moengo is where cyanide shipments enter Suriname on their way to Merian mine site. Paramaribo is the main city in Suriname, and the Academic Hospital is the biggest medical institution in the country.

Cyanide first aid equipment (Oxy packs) distributed near the cyanide mixing sparge area are inspected prior to a cyanide mixing sparge event. In the event of requiring refilling of medical oxygen, replacement of masks or replacement of any other first aid material distributed among the operations plant, the items that require recharging or replacement are sent to the medical center for immediate replacement.

Merian regularly checks the cyanide emergency response equipment to ensure it will be available when required. The personnel in the medical center are directly in charge of safekeeping and regular inspection of Cyanokits, as well as all the equipment regularly used in the medical center, as oxygen tanks with masks and humidifiers, blood pressure meters, blood oxygen saturation meters, heart rate meters, AEDs, digital thermometers, secretion aspirators, and other specialized equipment used regularly in a medical center and that may be required for use in emergency case of poisoning with cyanide. These reviews are carried out on a daily basis, being that there is equipment that is used on a regular basis for medical control of visitors and personnel with medical conditions (because of accidents or medical incidents in operations, typical of the volume of working population in the site).

Cyanokits expiration dates and oxygen tank pressures were checked during the audit. All Cyanokits were within expiration date and oxygen tanks were fully pressurized. Verification was through visual examination of the Cyanokits expiration dates, interviews with process personnel and onsite doctor and nurse, and review of inspection records. Medical staff perform weekly inspections of the ambulance, and daily inspections of Cyanokits and oxygen located in the medical clinic. Inspections are documented. The ambulance inspection includes a review of the inventory of medical equipment in its vehicles, as well as the operation of energized or pressurized equipment: medical oxygen, AED, heart rate monitor, secretion aspirator, stretchers, immobilization elements, and transfer of the injured, and stock of consumables (cotton swabs, gauze, bandages, and others).

Inspection records were available for review during the audit and were found to be consistent and complete. This requirement was verified through review of procedures from Health Control Services for medical center and ambulances, visual examination of the antidote expiration dates, interviews with onsite doctors and nurses, and review of inspection records. Also, it was reviewed the plant risk map and checklists of emergency response equipment deployed in the plant. The auditor confirmed that all Cyanokits available (6 units) were stored at the correct temperature and that they have not expired. This verification was complemented with interview with plant workers, and through discussion with personnel from H&S and Plant Operations areas.

Every worker and visitor to Merian has received a basic induction training, which includes CN Awareness training. This training covers the basic emergency response requirements, including the ones needed for emergency cyanide first aid. These are also listed in signs posted around the plant.

Merian has developed a specific procedure to respond to cyanide exposure, SOP "Cyanide Medical Treatment Procedure" (MER-HS-MED-SOP-005). This document describes in detail what has to be done in the event of a cyanide exposure. This SOP includes personnel responsibilities,

intoxication routes, description of intoxication levels, symptoms of mild and acute poisoning, on-site decontamination, first aid procedure (for conscious and unconscious patient), derivation to the medical center, medical attention, advanced treatment to conscious and unconscious patient, advanced decontamination process, advanced use of oxygen therapy, use of injectable antidotes, patient stabilization and transfer to medical centers outside the mining operation by ambulance. The first responder in the place initially will aid the victim securing the area and administering oxygen, then will come the 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 advanced medical treatment, and use of the Cyanokit if necessary.

The first steps of action in case of contact or intoxication, including the use of emergency showers and basic first aid, as instructed to all workers and visitors to Merian. Workers are not expected to provide medical first aid during an emergency that involves cyanide exposure, besides the use of emergency showers and the use of Oxy packs. Workers are trained to initiate emergency response procedures by contacting any emergency number on the operation:

- For Security Control Center:
 - Extension number: 28002
 - Extension number: 911/115
 - Mobile number: 8933208
 - Extension number: 28406
 - Extension number: 28408
 - Mobile number: 8955790/
8872117
- For Medical Center:
- Radio channel 2

Emergency shower and eyewash can be used directly by the contaminated person, or with the help of any member of the emergency response team. Also, the contaminated person can use oxygen by himself, or with the help of the emergency response team. If the person cannot evacuate the location of the incident by his own means, it will be helped by the emergency response team in order to reach the medical center.

This requirement was verified through site inspection and physical review of information available for the workers along the cyanide mixing sparge area and hydrometallurgical plant, document revisions, interview to workers on process plant, and complemented through discussion with personnel from H&S and Plant Operations areas.

In order to provide first aid and medical assistance to workers exposed to cyanide, Merian has a complete medical center onsite, that is located within 150 meters of the process plant and cyanide laydown area. This medical center, installed and operating on the site, includes medical offices, a triage room, two advanced medical care areas, and a quarantine area. Also, it has two fully equipped ambulances, in case it is necessary to urgently evacuate the injured or intoxicated.

Merian contracts Health Control Services to provide clinical and emergency response medical services at the site. Health Control Services provides medical and service personnel for the operation of the medical center. It is staffed with one physician and one paramedic during the day shift. The physician is on site and on call during the night. Each shift has a nurse on staff. The staff on duty spend the night in the operation, in order to be available 24 hours in case of emergency. The night watch is usually covered by a paramedic, who can summon the rest of the medical team if necessary. The ambulances can be driven inside the operation by the physicians, nurses or paramedics. In case that an external evacuation is needed, they are personnel beneath

the ERT that are designated as ambulance drivers, which will be called to bring support in case its needed.

The mine also has two fully equipped ambulance with paramedic at the medical center. Given the remote location and capabilities of local hospitals, Merian has determined that personnel are best treated at the on-site medical center with its trained staff and proper equipment. For this reason, personnel will not be transported to any local facilities tor treatment until they are stabilized.

The physicians, nurses and paramedics are qualified to provide medical/emergency assistance. The onsite doctors, nurses, and paramedics and have been trained in procedures to decontaminate and administer emergency first aid, including advanced oxygen therapy and use of Cyanokits in patients intoxicated with cyanide.

The ERT has also been trained in first aids, including the ones related to cyanide exposure. In occasion of the audit, the ERT was made up of 24 in 3 crews, with 16 emergency responders on site.

All the medical and paramedical personnel assigned to the operation not only have their professional certification to perform medical or paramedical services but have also received advanced training in risks and emergency care with cyanide, as well as risks and emergency care in mining. In particular, physicians and nurses have received advanced training in the use of antidotes against cyanide poisoning, as well as in measures for storage and inventory control of antidotes and medicines.

This requirement was verified through site inspection, review of written procedures and training records, interview with medical center staff, and complemented through discussion with personnel from H&S and Plant Operations areas.

Merian’s Health Control Services will apply the SOP “Cyanide Medical Treatment Procedure” (MER-HS-MED-SOP-005), on which details patient stabilization and transfer to medical centers outside the mining operation if needed.

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 or the on-site medical center, 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 center, one of the ambulances maintained at the mine site will transport the victim to the Academic Hospital, the main hospital in Paramaribo. Merian has also the ability to arrange emergency air evacuation, since it has contracted a local helicopter company to air transport any person out of the mine site if needed, including the ones exposed to cyanide. In this case, the evacuation will be done to Paramaribo, and outside of the country for additional medical treatment if required. Merian has an airstrip that will be utilized for air evacuation.

This requirement was verified through review of written procedures, interview with medical center staff, and complemented through discussion with personnel from H&S and Plant Operations areas.

Merian has made formalized arrangements with local hospitals in both Moengo and in Paramaribo. Merian has supplied two Cyanokit to each medical center. The Merian clinic physicians also trained the hospital medical staff 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 once it is stabilized.

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

This requirement was verified through review of written procedures and documents, review of written contract service agreement between Merian and Health Control Services, interview with medical center staff, and complemented through discussion with personnel from H&S and Plant Operations areas.



Principle 7 | EMERGENCY RESPONSE

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

Standard of Practice 7.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is in full compliance with
 in substantial compliance with Standard of Practice 7.1
 not in compliance with

Merian has the “Merian Emergency Response Plan” (MER-IMS.14-TMP04) [referred as ERP], which addresses response procedures for various types of emergencies in addition to those related to cyanide exposure and impact on human life, such as: firefighting, hazardous leaks and spills of solid or liquid products, deviations in the control of the pH of solutions, HCN generation, natural disasters and others. 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.

This plan is supported by other documents that provide specific actions for responding to HCN release emergencies, cyanide spills in the hydrometallurgical process, and filtration on soil or water, as well as communication to external stakeholders in the area of influence of the operation. The following documents assist with emergency response scenarios related to cyanide incidents:

- SOP “Cyanide Event Management Procedure” (MER-HS-SOP-014)
- SOP “Cyanide Medical Treatment Procedure” (MER-HS-MED-SOP-005)
- SOP “Emergency Environmental Monitoring” (MER-ENV-IMS.10-SOP02)
- SOP “Emergency Cyanide Spill Response” (MER-PRO-SOP-001)
- Flow Chart “Emergency Response Flowchart and Checklist” (MER-HS-CHK-003)
- Safe task procedure (STP) “Decontaminate & Clean Up Cyanide Spills” (MER-PRO-IMS-STP-286)
- “Process Facilities Spill Response Maps” (MER-PRO-010-D01)
- “Emergency Plant Shutdown Procedure” (MER-PRO-IMS.15-STP001)
- Management Plan “Merian TSF1 Emergency Response Plan” (MER-PRO-PLN-002)
- SOP “Community Emergency Response Plan” (MER-SER-SOP-002)
- Newmont Corporation “HS&S and S&ER Event Reporting & Investigation Procedure” (NEM-RMS-PRO-010)

This requirement was verified through revision of written procedures and documentation for plant operation and emergency response and complemented through discussion with personnel from H&S, Emergency Response, Environmental, and Plant Operations areas.

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 and the “Process Plant Emergency Cyanide Spill Response Plan,” that include appropriate cyanide failure scenarios for the site, including the following:

- a) Merian ERP and associated procedures do not consider a release of hydrogen cyanide on a catastrophic scale from storage and process as a credible scenario. Cyanide storage is in isotainers in an open yard; a large scale HCN emission from isotainers is not considered as this are safe waterproof steel storage tanks. Regarding the process plant, there are concurrent controls in the reagent area and process plant that would trigger shutoff valves in the system and would alert the control room operators for action when HCN gas monitors, pH monitors, tank level sensors, pressure and temperature, among other sensors, detect operational values out of normal range. The Newmont Rapid Response system may be initiated for significant events. The system utilized to mitigate and prevent the escalation of adverse consequences in the event that existing risk management controls fail. Rapid Response provides a corporate-wide, common and tested procedure that will allow an appropriate response to any circumstance, in any geographic location, in a predictable and measurable manner.
- b) The ERP describes detailed actions in the case of transportation accidents. A convoy is used to road transport cyanide product from the Port of Moengo to Merian mine site. The cyanide transporters, as explained in Standard of Practice 2.1, provide product transport services and have an emergency response plan (HAUKES N.V. “Emergency Response Plan – Cyanide Handling at Moengo Port” [HSE/PROC52-2017v3]) 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. The plan considers not only the product (solid sodium cyanide), but also the packaging (isotainers) and the potential failure modes during an accident on the transportation process. The ERP also considers emergency scenarios related to cyanide transportation process.
- c) Procedures to control exposures and accidental releases during unloading of Isotainers, mixing and storage of cyanide solution, are described in the STPs “Loading & Offloading ISO Containers – Mobile Crane” (MER-PRO-IMS.15-STP382), “Cyanide Sparging Pre-Start Checks” (MER-PRO-IMS.15-STP029), “ISO-Container Leak Test” (MER-PRO-STP-032), and “Cyanide Sparge” (MER-PRO-STP-033). Procedures to respond to cyanide spills are detailed in the SOP “Emergency Cyanide Spill Response” (MER-PRO-SOP-001).
- d) Potential or possible scenarios for fire and explosion events related to cyanide are described in the ERP, as well as response general procedure. In the SOP “Cyanide Event Management Procedure” (MER-HS-SOP-014) and in the Flow Chart “Emergency Response Flowchart and Checklist” (MER-HS-CHK-003) there are more detailed instructions on how to proceed in these scenarios. They consider firefighting in areas with storage of sodium cyanide, hazardous leaks and spills of solid or liquid products, deviations in the control of the pH of solutions, HCN generation, natural disasters and others.
- e) Procedures to follow in case of a pipe, valve or tank rupture incident related to cyanide are described in general in the ERP, and in specific details in the SOPs “Cyanide Event Management Procedure” and “Emergency Cyanide Spill Response.”
- f) Procedures for overflow of ponds and impoundment areas are described in general in the ERP, and in specific details in the document “Merian TSF1 Emergency Response Plan”.
- 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 SOP “Manage Emergency Power Load” and referred also in the “Emergency Plant Shutdown Procedure.”
- h) Procedures for uncontrolled seepage area described in the document “Merian TSF1 Emergency Response Plan”.
 - 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 TSF are described in general in the ERP, and in specific details in the document “Merian TSF1 Emergency Response Plan.”

It is important to mention that several of the documents listed refer to the transportation, unloading, storage and use of sodium cyanide in both IBCs and Isotainers. Many of the scenarios referring to cyanide in IBCs do not apply to cyanide in Isotainers, given that the latter has greater and better safety characteristics in terms of packaging resistance, leak potential, and fire potential.

Merian’s sodium cyanide supplier, Cyanco, is responsible for delivering sodium cyanide product from the point of origin in Alvin, Texas to the Port of Houston. InterMarine, Traymore, VSH and Haukes provide product transport services from the Port of Houston to the Merian mine site. Cyanco, InterMarine, VSH 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, mechanic 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 works together with its ICMI certified 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 Isotainers. The emergency response plan from Haukes addresses actions to respond to various transportation accident scenarios, including overturned vehicle, solid cyanide spillage, spillage associated with liquid, rain or open water, and fire. The procedure includes an inventory of the emergency response equipment carried with each cyanide transport convoy.

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.

Merian works together with all the actors of the cyanide supply chain to ensure that all transportation related emergencies are considered and that emergency response plans for such incidents are on file and up to date.

This requirement was verified through revision of written procedures and documentation from transport operators (for regular operations and emergency response preparedness) and

complemented through discussion with personnel from H&S, Emergency Response, Environmental, and Plant Operations areas.

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

These response procedures are supported by a number of other documents, which help to ensure that personnel can effectively:

- Clear site and/or area personnel from areas of exposure.
- Notify and/or evacuate potentially affected communities.
- Apply cyanide first aid and use of antidotes for cyanide exposures.
- Control releases by stopping pumps or closing valves at their source.
- Initiate emergency spill containment at critical points to prevent downstream impacts.

The ERP addresses these items directly or in more detail through SOPs, checklists and management plans. The documents that refer to emergency response management in Merian consider the various aspects related to potential emergencies with a cyanide leak or spill (as solid, but mostly as solution) or HCN gas generation. Elements were found describing and referring to:

- a) Specific actions, related to potential leak or spill scenarios, and the potential impact on people, communities, the environment, and operations. The ERP, Section 8.2 Personnel Evacuation describes the event whereby personnel evacuation from site is required, depending on the severity in conjunction with the environmental conditions (weather, only daylight flying, etc.) will be the determined air evacuation (helicopter or fixed wing); only daylight or road evacuation (ambulance); 24/7. The evacuation procedure will be conducted as described in the International Anvil Medical Evacuation Response Plan. The ERP also includes the Second Phase Evacuation, whereby injured or ill personnel is evacuated out of Suriname. Evacuation of communities is addressed in the ERP’s Appendix 1.
- b) First aid measures (considering decontamination and use of oxygen therapy) and use of antidotes for cyanide poisoning is addressed in procedures “Cyanide Event Management Procedure” and “Cyanide Medical Treatment Procedure.” In the case of first aid procedures, it has to be considered not only the documents issued by Merian, but also the standard and emergency medical procedures issued by Health Control Services related to emergency triage, vital signs monitoring, general first aids, chemical intoxication, chemical burns, respiratory support and cardiopulmonary resuscitation, stomach lavage and injectables, among others.
- c) Control of leaks and spills from the source (i.e., Isotainers, tanks, pumps, or pipes) is addressed in the ERP, and related emergency SOPs and management plans including procedures “Emergency Environmental Monitoring” and “Emergency Cyanide Spill Response.” It has to be considered that that the entire hydrometallurgical plant has secondary containment systems as part of the original technical and construction design or installed as an additional safety measure in the case of pipelines.
- d) Containment, risk assessment, impact assessment, mitigation and remediation and future prevention of leaks or spills are all addressed in these documents.



Standard of Practice 7.2

Involve site personnel and stakeholders in the planning process.

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

The emergency response procedures developed for Merian have been done using cross-functional teams from the Process, H&S, Security, Environmental, Community Relations and other areas. 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.

Merian has considered its workers within the planning of the response to cyanide emergencies. Merian's workforce is regularly approached by the operation through shift toolbox meeting, monthly safety meetings and tasks direct 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. It should be considered that the emergency response brigade is made up of workers on duty within their respective areas in operations (such as isotainers storage yard, cyanide mix sparge operators, leaching, hydrometallurgical circuit, tailings management, maintenance) and members dedicated full-time to emergency response, along with staff from the medical center. Through the document control center, every employee can access and review the ERP, including other corporate operations.

External stakeholders do not have a direct involvement in emergency preparedness and response planning; however, the Community Relations team maintains contact with community figures and utilizes community liaison officers to share relevant information with potential affected peoples with regards to 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.

It is important to mention that Newmont is part of a Joint Venture partnership, collaborating in the "Global Facility for Disaster Reduction and Recovery" Workgroup for Suriname, sponsored by The World Bank (<https://www.gfdrr.org/en/suriname>), and include partnership with the National Coordination Center for Disaster Management of Suriname (<https://gov.sr/thema/nccr-en-noodfonds/>) and Staatsolie Maatschappij Suriname N.V. (oil company, <https://www.staatsolie.com/>). Newmont Suriname is an active player in developing the country's capabilities for emergency response and disaster prevention.

This requirement was verified through ERP and relevant documents review, training records review, interview with workers, medical center staff, and emergency response coordinators, and discussion with personnel from H&S, Emergency Response, Community Relations, Environmental, and Plant Operations areas.

Although potentially affected communities do not play a direct role in emergency response planning, Merian Social Responsibility area applies and keep updated the SOP "Community

Emergency Response Plan,” that would be implemented in the event of a cyanide release that could potentially impact a community. The content of this SOP has been presented and 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

This requirement was verified through ERP and relevant documents review, geological and geographical location maps of Merian and the nearest communities and cities to the mine site and to the cyanide transportation route, and discussion with personnel from H&S, Emergency Response, Community Relations, Environmental, and Plant Operations areas.

Merian has not designated specific responsibilities to off-site responders s police and firefighters or communities due to the isolation of Merian, the distance and time it would take to have external resources in the operation, and the high level of preventive preparation and emergency containment and response elements that Merian has, both for chemical emergencies due to leaks or spills, and worker poisoning, with the exception of the hospital agreements for treating patients that have been exposed to cyanide (Moengo as support location and Paramaribo’s hospital the main medical hospital). In July 2023 Merian provided training and cyanide antidotes to Paramaribo Academic Hospital.

Due to the location and response capacities of local agencies, Merian would maintain responsibility for emergency response activities within the communities if 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 participation is required.

Local agencies (e.g., Firefighters 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 SRT (Site Rapid Response Team).

Merian has considered as external support elements for emergency aerial transport evacuation from mine site to Paramaribo by helicopter, two local companies located in the country:

- Hi-Jet Helicopter Services N.V. (Hi-jetheli@sr.net), and
- Pegasus Air Services (<https://www.pegasus.sr/>)

This requirement was verified through ERP and relevant documents review, training records review, interview with medical center staff and emergency response coordinators, and discussion with personnel from H&S, Emergency Response, Community Relations, Environmental, and Plant Operations areas.

Merian’s ERP states that it 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.

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

The main stakeholders that Merian considers for cyanide management are its own workers. In this sense, the dialogue and consultation processes are regular and constant, taking their opinion not only in terms of occupational safety and health, but also in preparation for emergency response, especially with cyanide.

This requirement was verified through ERP and relevant documents review, training records review, interview with workers, medical center staff, and emergency response coordinators, and discussion with personnel from H&S, Emergency Response, Community Relations, Environmental, and Plant Operations areas.

Standard of Practice 7.3

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

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

Merian's ERP and associated process plant documents contain the following cyanide related elements:

- a) Emergency response coordinators that work full time on the Emergency Response area, as part of the H&S team staff and acting head of the Emergency Response Team (ERT). Also, ERT leaders have been designated, both by plant areas and by work shifts. Besides the emergency response coordinator, all the members of the ERT are volunteer, with a 24/7 site coverage

A Security Control Center (SCC) is in place to receive calls 24/7 from all the mine site and external areas, via mobile phone calls, land line phone calls, internal extension number phone calls, and radio communication. The SCC is part of the Security area. One of the SCC tasks is to ERT and Medical Center of emergency situations as reported via phone, radio or other means.

It should be considered that not only any member of the ERT, but also any person in the operation, can request the activation of the emergency response, considering their right to safe work and access to communication media within the operation. No emergency alert is anonymous, the origin of said alert should always be considered in the report and in the incident investigation, be it a person or an automated alert element. The SCC, ERT and/or Area Supervisors have been designated the appropriate authorities to commit required resources and take command of emergency situations, including the

ones related to cyanide, and also including the handover to more senior or better trained personnel as required.

- b) The operation's emergency response plan identifies the Emergency Response Team (ERT) members. The ERT is formed by the following persons:
- The Emergency Response Coordinator (permanently dedicated personnel for emergency preparedness and response) on mine site, being a position covered by work rotation, in coordination with H&S area.
 - ERT leaders per shift. There is a designated leader (Captain) and an alternate leader (Lieutenant).
 - ERT members per shift. Beneath these members, there is at least one person per shift designated as driver, in order to support the medical center with the ambulance if they need to transport injured people outside the mine site.
 - Medical Center staff.

In the event that the emergency must escalate, the activation of a Site Rapid Response Team (SRT), a Regional Response Team (RRT), and a Corporate Response Team (CRT) is considered. These work teams will include, according to the level of the emergency, the following people:

- H&S staff members on duty, including supervisors, superintendent, and manager.
 - Security area staff members on duty, including Control Center, supervisors, superintendent, and manager.
 - Operation staff members on duty, including supervisors, superintendent, and manager.
 - Vehicle drivers and heavy machinery operators on duty.
 - Environmental Area staff members on duty, including supervisors, superintendent, and manager.
 - Community Relations staff members on duty, including supervisors, superintendent, and manager.
 - Other staff members from the mine areas (legal, commercial, public affairs, planning, general management).
 - Other staff members from the Newmont Regional group.
 - Other staff members from the Newmont Corporate offices.
- c) Merian's ERP and related documents detail and explain the various responsibilities and activities of ERT members, including the minimum training requirements which have been established. These training requirements are recorded in a yearly block training, and include but are not limited to:
- General induction in warning of risks with cyanide
 - Specific risks of cyanide exposure, according to working tasks
 - Emergency Call-Out procedures
 - HAZMAT response
 - Emergencies due to HCN generation outside the operating parameters
 - Response to emergencies due to contact or cyanide poisoning (first response for all workers in warehouses and in the operations plant, advanced level for medical center personnel)
 - Emergency response due to sodium cyanide spills or leaks (including decontamination, technical cleanup and environmental remediation)
 - Emergency response with chemical spills
 - Industrial firefighting
 - Rope rescue
 - Rescue at heights

- Vehicle extrication and rescue

These trainings and exercises are conducted either by internal H&S, Security or Medical Center staff members, or by external organizations, as:

- Basic and advanced First Aids: SECURICO Opleidingscentrum (<https://www.securico.sr/>)
- HAZMAT / Cyanide related emergencies: HHEMMS (Hazmat, Hazwoper, Emergency, Maritime, Management Services) (<https://www.linkedin.com/services/page/4a82bb32a397024437/>)
- Ambulance Driving: BRIDGE Medical Group (<https://bridgemedgroup.com/>)

The ERT members also have a weekly exercise schedule, considering two-hours to four-hours exercises with topics distributed throughout the year as:

- Use of Oxygen resuscitation kits (Oxy packs), resuscitation bags, portable oxygen saturation meter, Heimlich maneuver
 - CPR (cardiopulmonary resuscitation), use of AEDs (Automatic Electric Defibrillators)
 - Use of eye wash stations and emergency showers, chemical decontamination
 - Use of Self-Contained Breathing Apparatus (SCBA) and advanced respiratory protection
 - Use of encapsulated chemical protection suits and advanced chemical protection
 - Use of mono-gas and multi-gas monitors
 - Emergency communications procedures
 - Immobilization and transfer of injured
 - Rope rescue
 - Confined-spaces rescue
 - Rescue at heights
 - Firefighting
 - Vehicle extrication and rescue
- d) Merian's ERP and related documents consider the means of communication with the SCC in case of emergency, as well as the communication protocol for (1) receiving an emergency call/communication, (2) notify the ERT coordinator and brigade leaders (designated or alternate on shift), (3) notify the ERT members, and (4) notify the Medical Center.

Also, if the emergency must be escalated, the SCC has access to the EMQNET system (<https://emqnet.com/>) contracted by Newmont, for communication and contact of people involved in emergency response and crisis management, according to the type and level of emergency that occurred. This system includes escalation not only to the general manager and management staff in the country in order to activate the SRT, but also regional and corporate officers from Newmont, in order to activate the RRT, and/or the CRT.

Also, the SCC can contact the national Police (phone number 115) and Firefighters (phone number 110), cyanide transport company, external contractors, external medical centers, and aerial emergency evacuation transport company.

- e) The emergency related documents details the responsibilities, regular activities and tasks in case of emergency, of coordinator and leaders of the ERT, members of the ERT, Medical Center staff, SCC, and management staff that can be involved in an emergency response process, including the members, responsibilities / accountabilities and tasks to be performed by the SRT.

As general guidelines, three main lines of action are considered: (1) communication and coordination by the SCC, (2) decontamination and transfer of injured people, and

response to chemical emergencies by the ERT, and (3) response to medical emergencies by the Medical Center.

- f) The ERP and related documents detail the emergency material resources available for the ERT to respond to emergencies at the process plant and ancillary facilities related to cyanide. The complete details of these equipment are listed in the Checklist “HAZMAT Equipment & Materials” (MER-HS-IMS-08-CHK06).

Among the materials and equipment listed are:

- SCBA equipment, spare bottles, and type-D air compressor
 - Full face masks and high efficiency canisters (ABEKP3)
 - High chemical-resistant encapsulated and semi-encapsulated suits (for training and for real use)
 - High chemical-resistant gloves
 - High chemical-resistant boots
 - ATEX radios and mobile phones
 - Gas monitors (single-gas and multi-gas) with HCN sensor
 - Chemical sealing tapes
 - Forced ventilation / forced air extraction equipment
 - Portable lighting systems
 - Plastic and non-sparking work tools (shovels, crowbars, mallets, brooms, dustpans, rakes)
 - Power tools
 - Portable decontamination system
 - Absorbent cloths for hydrocarbons
 - Absorbent cloths for corrosive chemicals
 - Systems for plugging leaks in tanks and pipes
 - Portable dry chemical powder extinguishers (5kg, 12kg, 50kg)
 - Lockout / Tagout Implements
 - Stretchers, head immobilizers, spinal immobilizers, neck immobilizers, first aid kits
 - Bags, buckets, and containers for contaminated waste
 - Implements for incident command post
- g) The emergency related documents detail the emergency material resources available to respond to emergencies at the process plant and ancillary facilities related to cyanide. The complete details of these equipment are listed in the Checklist “HAZMAT Equipment & Materials.” This checklist details quantities, condition (new / used), date of entry into operation, required maintenance/calibration/testing date, and usage record.

All inspections, maintenance, calibration, testing, recharging and/or replacement of spare parts, as well as withdrawal of use due to expiration of the useful life or warranty of operation, are carried out in accordance with the respective manufacturer's manuals of each equipment.

The SCBA equipment, spare bottles and type-D air compressor have a specific additional checklist (MER-IMS-14-TMP03), due to the specialized maintenance (lubrication, change of gaskets and gaskets, change of high efficiency air filters, hydrostatic tests and high-pressure tests, change of batteries and decontamination) that must be performed regularly on this equipment.

Inspections to the emergency response equipment are performed on a monthly basis, or after its use on a real emergency, to ensure that they are maintained in working conditions. The high chemical-resistant encapsulated and semi-encapsulated suits are

the only equipment that have two different sets (one for use during trainings, and one for use only on real emergency situations) on manufacturer's recommendation.

- h) Outside entities as police and firefighters are not directly involved in Merian's ERP, with exception of medical centers in Moengo or Paramaribo. Police and firefighters as well as community service contractors working for Newmont, will participate under direction of Merian personnel as requested to assist with emergency response. The call-out procedures for the site are detailed in the "Community Emergency Response Plan," and include notification to site management personnel (specifically, to the Senior Director External Relations, and to the Community Relations Manager) which will have the task of notifying local stakeholders and other required parties (e.g., regulators, Community Leaders/Members) as per event severity levels.

These requirements were verified through plant visit, emergency response base visit and inspection, ERP and related documents review, interview with workers, medical center staff, and members of the ERT, and discussion with personnel from H&S, Emergency Response, Community Relations, Environmental, and Plant Operations areas.

Outside entities that may participate in emergency response scenarios include local agencies (police, fire, medical) as well as community service contractors working for Newmont.

As indicated in Standard of Practice 6.3 Health Control Services has written proof of the coordination and training provided to both medical centers, through the signature of the "Cyanokit Statutory Declaration" by the physicians that received the training. This document records (1) that they have received training regarding the diagnosis and treatment of cyanide poisoning, and use of Cyanokit, and (2) their institutional commitment to receive and medically treat any patient who is referred to their institution by Newmont, including those who present symptoms of cyanide poisoning.

Firefighters and Police have a statutory responsibility to assist with notification and mobilization of people in case of emergency or disaster. Merian has regular approach and coordination with both agencies, not only by the Community Relations area, but by the H&S area, including them in the regular specialized trainings and drills held, especially in Moengo, and usually in coordination with the cyanide transport company. The main training on which they are invited to participate, is the HAZMAT / HAZWOPER (Hazardous Waste Operations and Emergency Response) training, and the cyanide emergency drills.

The Community Relations area will be in charge of coordinating the participation of local contractors and community members in case of a real emergency, as detailed in the "Community Emergency Response Plan." They are prepared to perform this communication and coordination task, since their regular work plan with local communities includes communication of risks arising from Merian's operations, including the potential for cyanide emergencies and the roles and actions to be carried out by members of the potentially affected communities, and the responsibilities that would assume Merian and Newmont in this regard.

These requirements were verified through the ERP and related documents review, interview with medical center staff, members of the ERT, and discussion with personnel from H&S, Emergency Response, Community Relations, Environmental, and Plant Operations areas.



Standard of Practice 7.4

Develop procedures for internal and external emergency notification and reporting.

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

If the emergency must be escalated, the SCC has access to the EMQNET system (<https://emqnet.com/>) contracted by Newmont, for communication and contact of people involved in emergency response and crisis management, according to the type and level of emergency that occurred. This system includes escalation not only to the general manager and management staff in the country in order to activate the SRT, but also regional and corporate officers from Newmont, in order to activate the RRT, and/or the CRT.

The EMQNET fulfills the requirements of The Newmont Corporation "HS&S and S&ER Event Reporting & Investigation Procedure" for notification to local management, regional management, corporate management, and external agencies. The SRT supports this program by providing the platform and authorizing via system to escalate the notification process to regional and corporate personnel based on event consequence levels, while maintaining real-time data sharing to all SRT participants.

The ERP and related documents include 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.

The SCC has the information in physical format, in digital format, and via the EMQNET, to fulfill their task of initiating effective communication of emergency situations that are communicated to them and maintaining follow-up thereof. Also, the SCC can contact the national Police (phone number 115) and Firefighters (phone number 110), cyanide transport company, external contractors, external medical centers, and aerial emergency evacuation transport company.

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

This requirement was verified through ERP and related documents review, interview with medical center staff, and discussion with personnel from H&S, Emergency Response, Environmental, and Plant Operations areas.

The ERP and related documents set out procedures for communicating with communities and media during potential or actual emergencies that have a major impact on human lives or the environment, including those related to cyanide.

The Community Relations area plays a pivotal role in coordinating the participation of local contractors and community members in case of an actual emergency, as detailed in the "Community Emergency Response Plan." Equipped with the necessary tools and means for effective communication, they are prepared to perform this task. The "Community Emergency

Response Plan” includes an updated list of communities and key contacts, along with the most appropriate means of communication for each contact. It also details the main response and protection actions required for different emergency situations. The Community Relations team also maintains a listing of key community leaders and potentially affected people in the nearby communities.

The Newmont Corporation “HS&S and S&ER Event Reporting & Investigation Procedure” provide clear lines of responsibility and media communication model templates. Once the notification process initiated by the SCC activates the SRT, any media inquiries that relate directly to Merian operations, its business, and or any associated companies, including the safety and well-being of people working for Merian, must be referred directly to the SRT leader (Merian General Manager, or senior on-duty manager in charge of the operation), which will consider if handling the communication process with media directly, or through the External Relations management team, Communications management team, or the Community Relations management team

Merian’s ERP includes a requirement and details to notify ICMI of any significant cyanide incidents, as defined in ICMI’s *Definitions and Acronyms* document. Such incidents have not occurred during the certification period that is the subject of this audit.

This requirement was verified through ERP and related documents review, and discussion with personnel from H&S, Emergency Response, Environment, and Plant Operations areas.

Standard of Practice 7.5

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

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

The ERP and related documents provide detailed information on cyanide event remediation activities including control and containment of any spilled/released material. Specifically, the documents “Cyanide Event Management Procedure,” “Decontaminate & Clean Up Cyanide Spills,” “Emergency Environmental Monitoring,” and “Community Emergency Response Plan” include the following guidance:

- a) In the case of sodium cyanide solids, liquid (28%) cyanide solution, process slurry or solution containing any level of cyanide, and cyanide-containing soils, the preferred order of actions to be taken is:
 - Pumping / transferring spilled solution or solid materials back into the process
 - Absorbing spilled material with laterite or other absorbent material
 - Scraping / excavating spillage area for addition back into the process (this will ultimately be done for all spills), and
 - Detoxification of the spill

Procedures state it will be preferable to derive recovered solutions or solids to the SAG mill, to incorporate them back into the hydrometallurgical process and eliminate the need to carry out a neutralization that implies the use of additional chemical inputs in

solid or liquid materials. If the spill had taken place within the cyanide storage banded area, the solution may be pumped back into the storage tank via the cyanide bund sump pump. The contaminated recovered soil material (including the laterite used for absorption of spills and construction of containment berms and walls) must be removed and disposed of into the SAG mill.

- b) For decontamination of soil and other contaminated materials that may require detoxification (i.e., when it is not feasible to collect contaminated or impacted soils, such as asphalt or concrete), it will be used a sodium hypochlorite solution between 3-12%. Due to the chemical properties of sodium hypochlorite and the resulting compounds it forms, it will only be used in extreme situations, and only under the direction of the Process Superintendent or above, and if the spillage and reagent material are prevented from entering a run-off ditch or watercourse.
- c) The preferred absorbent material used to contain spills is laterite. The recovered laterite must be removed and disposed of into the SAG mill. Other absorbent materials, as well as contaminated PPE, must then be picked up and placed in plastic bags or containers. All the disposable materials used or the debris generated or contaminated during the clean-up process of a cyanide spill that is not feasible to be dumped back into the SAG mill, will have to be collected, packaged and disposed as hazardous waste; or be decontaminated with a sodium hypochlorite solution (similar to the rinse process for empty cyanide bags) and then disposed as regular waste. The decontamination solutions (including the one used for the decontaminations and clean-up of tools and equipment used on the emergency response) will be recovered and sent to the water treatment plant.
- d) Regarding provision for alternative drinking water sources for communities, Merian Community Relations area have provisions detailed in the SOP "Community Emergency Response Plan" that would be implemented in the event of a cyanide release that could potentially impact any community. This procedure has been discussed with community leaders.

This requirement was verified through ERP and related documents review, and discussion with personnel from H&S, Emergency Response, Community Relations, Environmental, and Plant Operations areas. The procedure MER-PRO-SOP-001 Emergency Cyanide Spill Response indicates sodium hypochlorite is stored in the warehouse, to facilitate a rapid response.

Due to the hazardous nature and potential impact of neutralizing agents, sodium hypochlorite solution will only be used to clean-up a cyanide spill when directed by senior process management. SOPs "Emergency Cyanide Spill Response" and "Decontaminate & Clean Up Cyanide Spills" describe not only the requirements and precautions for cyanide spill cleanup, but also clearly states the prohibition of neutralizing agents in areas where it could reach storm water collection or surface water bodies.

The ERP prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide released into surface water or that can reach surface water. This requirement was verified through ERP and related documents review, and discussion with personnel from H&S, Emergency Response, Community Relations, Environmental, and Plant Operations areas.

The ERP and related documents require monitoring of spilled process solution, contaminated soils, 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 laboratory 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 applies the SOP “Emergency Environmental Monitoring,” which requires that water and soil is sampled and monitored after a cyanide spill 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, including cyanide concentration and pH. The document includes sampling maps for the plant area and water bodies, and works together with SOP “Emergency Cyanide Spill Response” and the STP “Decontaminate & Clean Up Cyanide Spills” in enforcing and verifying the prohibition of use neutralizing agents in areas where it could reach storm water collection or surface water bodies

These three documents also work together in the case of impacted soils. Excavation will continue until no evidence is visible, and the procedure calls for over-excavation to ensure all impacted soil is addressed. The document describes procedures for soil sampling including methodologies, parameters and the final cyanide concentration that will be allowed in residual soils as evidence that the spill has been completely cleaned up.

This requirement was verified through ERP and related documents review, and discussion with personnel from H&S, Emergency Response, Community Relations, Environmental, and Plant Operations areas.

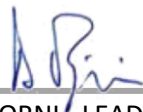
Standard of Practice 7.6

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

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

The Merian ERP and related documents are reviewed no less than every three years and include input from relevant areas in the operations and end user groups. The ERP and related documents may also be updated (as applicable) in the following cases:

- Changes occur to mine site facilities or activities.
- Changes occur in national legislation or regulations.
- Changes occur in Newmont corporate policies, guidelines, standards or procedures.
- Changes occur in voluntary regulations to which the mine adheres (i.e., Cyanide Code).
- Relevant technological or use certification changes occur in the equipment and materials used in emergency response (i.e., the use of antidotes with fewer unwanted impacts on health or updating the practice of use of SCBAs established by the NFPA 1981 standard).
- Changes occur in the regulations and good practices for emergency response referenced in training (i.e., changes in CPR practice stated by the AHA [American Heart Association]).
- Drills or incident investigations identify a gap on procedures, materials or training.
- Recommendations are received from personnel, third parties (i.e., contractors [as Haukes], providers of equipment [i.e., Industrial Scientific] and materials [i.e., Cyanco], and social stakeholders [i.e., the local communities alongside the transport route between Moengo and the mine site]), or relevant case studies at a national or international level.



The documents reviewed as part of this audit have been prepared or updated (as indicated in each of them) between January 2022 and April 2024.

This requirement was verified through ERP and related documents review, and discussion with personnel from H&S, Emergency Response, Community Relations, Environmental, and Plant Operations areas.

Merian conducts mock emergency drills and/or desktop scenarios no less than twice a year to test the emergency preparedness and response of Process Plant, ERT, SCC, Medical Center, Environmental area, H&S area, Security area, and other relevant departments & personnel. Mock drills are developed to include various locations and scenarios including cyanide environmental release and exposure responses.

Drill scenarios are developed in advance and risk assessed to minimize potential impact of event unpreparedness. In addition to the mock drills, actual events are also used to test emergency response capabilities.

Records of outcomes and reviews of cyanide mock drills performed inside the mine site are stored by H&S and Emergency Response areas. There are also mock drills conducted outside the mine site, specifically in Moengo, and with the participation of Haukes, Police, Firefighters, and the Community Relations, H&S, Emergency Response and Security areas. Records of outcomes and reviews of cyanide mock drills performed outside the mine site are stored by H&S, Emergency Response and Community Relations areas. Haukes also keeps records of the mock drills in which they participate, and shares with Merian their reports, findings, and records in photos and videos.

This requirement was verified by review of the Emergency Drill Reports for this recertification period and discussion with personnel from H&S, Emergency Response, Community Relations, Environmental, and Plant Operations areas.

As examples, in August 2023 Merian participated in Hauke's cyanide transporter emergency mock drill, who simulated a sodium cyanide spill and application of cyanide first aid at Langetabbetje, km 21 Suriname, simulating a crash between two trucks in the convoy. After the drill, a debriefing session was conducted to review the overall response, where they identified areas for improvement, and provided feedback to all participants. From the drill evaluation there were opportunities for improvement and recommendations.

In July 2023 Merian conducted an emergency mock drill exercise at the process plant simulating. The process operator will release an emergency notification regarding a man down that has been exposed to cyanide spill release during his activity. There were 9 participants and 3 observers, opportunities for improvement and recommendations.

In December 2023, another drill exercise was conducted at the process plant. The process operator released an emergency notification regarding a box consumed with solid cyanide spilled during his activity. The spill took place inside the cyanide storage facility. There were 14 participants and 3 observers and reported improvement opportunities, required actions and follow-up until closing all actions.

The ERP requires that all cyanide related emergencies and mock drills are evaluated in order to identify and document improvement opportunities and actions to be assigned to appropriate personnel and areas inside or outside the operation. These improvement opportunities and

actions can include updates to the ERP and related documents, as well as updates in the “Cyanide Management Plan” and related documents.

No update of the ERP or related documents was performed during the recertification period related to cyanide incidents, as no such emergencies requiring its activation occurred during that period.

This requirement was verified through ERP and related documents review, mock drills reports and records, and discussion with personnel from H&S, Emergency Response, Community Relations, Environmental, and Plant Operations areas.



Principle 8 | TRAINING

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

Standard of Practice 8.1

Train workers to understand the hazards associated with cyanide use.

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

Merian has a Technical Training department responsible for development and presentation of training programs at the site. All personnel and visitors to the site attend a site induction training which discusses cyanide hazards present on the site.

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 task the person will perform, and the work areas in the mine to which they will have access.

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 auditors upon arrival to site.

In addition to the general site induction, a Process Plant Induction is required for all personnel with process plant access. This training provides a plant overview and includes environmental, health, and safety standards for working inside the plant area; including the ones related to cyanide risks and safe operating practices.

The training covers but is not limited to:

- Locations where cyanide is present.
- Alarm and alarm response.
- PPE requirements.
- Safe handling and management guidelines.
- Symptoms of exposure.
- Cyanide First Aid and Emergency Response.

The Technical Training department also provides a number of additional hazard identification training courses and inspections to ensure that personnel are able to identify and report hazards that they observe in their respective work areas. For example, Security area 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.

For personnel and visitors requiring infrequent plant access, escorts are used to ensure their safety whilst inside the plant facilities.



This requirement was verified through review of training records, training materials, interviews to Plant operators and Process Safety Training group staff, and discussion with personnel from the Technical Training Department, Environmental and Plant Operations areas.

Training matrices have been developed which identify mandated courses and frequencies for refresher. In addition to formal refresher training, toolbox talks and Health & Safety meetings are held to discuss critical safety and environmental aspects including cyanide and cyanide related incidents, actions, and events.

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 updated monthly and checked at least once a week to identify employees due for refreshment training. A monthly training schedule is developed and distributed to operation's department heads, so they can program their personnel for the mandatory refresher training.

This requirement was verified through review of training records, training materials, interviews to Plant operators and Process Safety Training group staff, and discussion with personnel from Environmental and Plant Operations areas.

The Technical Training Department, through the Process Safety Training group, is responsible of maintaining training records for all personnel on site in a database. Records to be kept include:

- Trainee name.
- Trainer name.
- Training type/course.
- Date of completion.
- Test Scores (Pass/Fail).

The Process Safety Training group keeps both physical and digital files for each employee, and specifically for plant operators and staff that will be in direct or indirect contact with cyanide or HCN.

The auditor reviewed training records from plant operators interviewed during the plant field visit and the task observation performed during a cyanide mix sparge process. The records effectively identify the trainee, the trainer, topics covered, date and sign off sheet, and test scores in the trainings that included a final written evaluation. These written records were supplemented with photographs, and in some cases, with video recording. This requirement was verified through review of a sample of records covering the recertification period (May 2021 to April 2024).

This requirement was verified through review of training records, training materials, interviews to Plant operators and Process Safety Training group staff, and discussion with personnel from the Technical Training Department, Environmental and Plant Operations areas.



Standard of Practice 8.2

Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

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

All personnel that work in the plant must undergo training prior to being allowed to work at the process plant. Pre-requisite training include:

- Site induction
- Plant induction
- Plant general/specific orientation and safety awareness (classroom & field sessions)

The main objective of these trainings is to ensure that all operators understand and are able to operate the various areas of the plant in a safe and environmentally responsible manner.

After successful completion of these training sessions, operators are assigned to a specific circuit for On-the-Job Training, 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, in order to show in the field how to safely conduct tasks related to cyanide management, including cyanide unloading and storage, preparation, production and maintenance. Also, they are Planned Task Observations performed, which are conducted by the supervisor of the trainee.

Determination of competency is based on test score and observations by qualified and/or experienced plant operators and/or maintenance personnel.

This requirement was verified through review of training records, training materials, interviews to Plant operators and Process Safety Training group staff, and discussion with personnel from Environmental and Plant Operations areas.

The Technical Training Department, in collaboration with functional area personnel has developed a series of training programs designed to build awareness and competency for various plant activities and programs. Each training module includes a training plan which outlines the course objectives and expected competency testing requirements for the module. Training schedules, plans and modules are developed and maintained by the Technical Training Department and are available on the network drive folders.

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.

This requirement was verified through review of training records, training materials, interviews to Plant operators and Process Safety Training group staff, and discussion with personnel from the Technical Training Department, Environmental and Plant Operations areas.

The Technical Training Department provides training and competency testing to process department personnel, in order to qualify Process Plant Technical Trainers. These qualified Plant Trainers have industry experience and have been certified as trainers.

To support the Plant 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, as well as pedagogical techniques to improve their performance as trainers.

Merian has experienced personnel in cyanide and milling processes conducting the Process Safety Training group. 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 and to the Plant Trainers.

This requirement was verified through review of training records, training materials, interviews to Plant operators and Process Safety Training group staff, and discussion with personnel from the Technical Training Department, Environmental and Plant Operations areas.

As indicated above, all Merian employees and contractors are provided with induction training that includes cyanide hazard recognition prior to working on the site. All employees that work with cyanide are also provided with specific and more comprehensive cyanide awareness and hazard training, which includes cyanide hazard recognition, exposure symptoms and appropriate emergency response actions. 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, including 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, considering not only the general industrial and operational hazards and risks related to their function, but in specific the potential risks related to cyanide presence in the work environment.



This requirement was verified through review of training records, training materials, interviews to Plant operators and Process Safety Training group staff, and discussion with personnel from the Technical Training Department, Environmental and Plant Operations areas.

Merian employees and contractors have refresher training, which include the topics referred to sodium cyanide and HCN awareness, hazards and risks, and for the performance of specific cyanide-related tasks. Cyanide awareness refresher training is delivered by the Technical Training Department no less than annually.

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 on a monthly basis and keeps track of employees and contractors which training will be overdue by the end of that month. This information is then distributed to operation's department heads, so they can program their personnel for the mandatory refresher training.

This requirement was verified through review of training records, training materials, interviews to Plant operators and Process Safety Training group staff, and discussion with personnel from the Technical Training Department, Environmental and Plant Operations areas.

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.

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. The results of these evaluations are also kept on record in each worker's file. These Task Observations are conducted following the guidelines on STP "Task Observation" (MER-LD-IMS-S.06-A14). The PTO program conducted by process plant supervisors helps to identify deficiencies in task procedures performed by personnel so that these deficiencies can be corrected either on the spot or via additional task training.

STPs developed for the plant facilities include a Conduct Performance Assessment section, in order to document an employee's ability to effectively complete tasks according to the developed STPs. STPs assessment scores are then recorded in the employee's training records with a "Yes/No" designation, and an indication (if no) that the employee "needs further training and/or workplace experience."

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.

Training records, testing results, and PTOs records were reviewed for the audit recertification period and were found to be consistent and complete.

This requirement was verified through review of training records, training materials, interviews to Plant operators and Process Safety Training group staff, and discussion with personnel from the Technical Training Department, Environmental and Plant Operations areas.

The Technical Training Department, through the Process Safety Training group, is responsible of maintaining training records for all personnel on site in a database. Training records are retained not only as group records, but as individual employee files. Records to be kept include:

- Trainee name.
- Trainer name.
- Training type/course.
- Date of completion.
- Test Scores (Pass/Fail).

The Process Safety Training group keeps both physical and digital files for each employee, and specifically for plant operators and staff that will be in direct or indirect contact with cyanide or HCN. Employee training records are entered into the training database for each employee and maintained for the duration of employment.

A training matrix is generated from the training database to assist process plant personnel in their training progression and refresher exercises. Records from PTOs completed by process plant supervisors and STP assessments are also maintained by the Process Safety Training group.

Samples of records were available and reviewed and were found to be consistent and complete.

This requirement was verified through review of training records and employees’ personal files, training materials, interviews to Plant operators and Process Safety Training group staff, and discussion with personnel from the Technical Training Department, Environmental and Plant Operations areas.

Standard of Practice 8.3

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

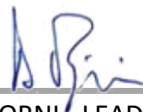
The operation is in full compliance with
 in substantial compliance with Standard of Practice 8.3
 not in compliance with

Every employee and contractor at Merian receive cyanide awareness and basic emergency response training, aside from their roles and responsibilities on the operation.

Plant 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. As indicated in Standard of Practice 7.3c, include courses such as:

- Use of Oxy packs
- HAZMAT Response
- CN and Basic First Aid
- Spill management (including control, containment, stabilization, neutralization, and decontamination)



- Records and/or certificates of completion of this training are provided and maintained by the Technical Training Department.

The cyanide emergencies procedure addresses several cyanide exposure scenarios such as spills and cyanide exposure (through inhalation, absorption by skin or eyes contact, and ingestion). In addition, the procedure describes evacuation and cleanup measures.

Control room operators receive task training on emergency response to cyanide releases. These include tasks referred to plant emergency stop and emergency communications (for plant evacuation and for requesting emergency response support). Control room operators will remain in the control room, which is on a separate air supply area, to carry out these procedures.

Verification included review of training record and interviews with operators as well as process and H&S personnel. Plant 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 auditor and found them consistent and complete.

This requirement was verified through review of training records, training materials, interviews to Plant operators and Process Safety Training group staff, and discussion with personnel from the Technical Training Department, Environmental and Plant Operations areas.

All personnel on site are trained in basic emergency notification procedures which include callouts to the SCC and/or area supervisors to initiate emergency response actions.

Process plant first responders and ERT personnel receive training in cyanide first aid, decontamination and clean-up procedures. To supplement the training program, personnel are routinely involved in drills to test their retention of emergency response.

The ERT is comprised by voluntary members, 24 in total divided in three shifts. They are led by a coordinator, who is qualified as professional emergency responder, and which position is covered by 2 persons in rotational shifts at the emergency headquarters at the mine site, next to the medical center.

Members of the ERT are required to have completed a more advance emergency response training in the following areas:

- Industrial firefighting
- HAZMAT
- Rescue at heights
- Rope rescue
- Vehicle rescue
- Confined-space rescue
- First aids

Within the training topics that the members of the emergency response brigade receive, the elements relevant to emergencies with sodium cyanide are considered. In particular, they are considered topics regarding toxicology, first aid, and attention to leaks and spills of solid and liquid sodium cyanide. In the latter case, the training considers the use of PPE for advanced chemical and respiratory protection, the use of chemical absorbent elements, and protocols for handling, recovery and/or encapsulation of cyanide solutions and cyanide-contaminated materials, as well as neutralization and decontamination processes.

In the case of first aid, brigade members have been trained in the use of medical oxygen, use of safety showers and decontamination of people, and immobilization and transfer of the wounded. In a complementary way, the medical center staff have advanced training in the

treatment of people intoxicated with cyanide, considering advanced monitoring of medical conditions (such as oxygen saturation, heart rate, blood pressure, temperature), application of injectable antidotal elements by intravenous infusion, and in general for prehospital care and life support.

ERT members and medical center staff undergo periodic refresher training exercises to ensure they are able and ready to respond to various scenarios across the plant.

This requirement was verified through review of training records, training materials, interviews to Plant operators and Process Safety Training group staff, and discussion with personnel from the Technical Training Department, Emergency Response, Environmental and Plant Operations areas.

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. Nevertheless, emergency responders for events at the Port of Moengo or along the transport route are involved in ERP discussions and training as appropriate:

- Police and Firefighters participate of HAZMAT training (focused on sodium cyanide transportation) in Moengo, alongside the transport company (Haukes) and Merian
- Moengo's Medical Center staff receive training on cyanide toxicology treatment, and use of Cyanokits, by Health Control Services, on behalf of Merian.

This requirement was verified through review of training records, training materials, interviews to Plant operators and Process Safety Training group staff, and discussion with personnel from the Technical Training Department, Emergency Response, Community Relations, Environmental and Plant Operations areas.

Merian employees and contractors have refresher training, which includes the topics referred to cyanide and HCN awareness, hazards and risks, and work safety involving usage of cyanide or presence of HCN. This requirement also includes refresher training for the emergency response brigade members, related to the level of involvement they will have in case of an emergency. This refresher training is conducted annually or less, depending on the rotation of the personnel that make up the emergency response brigade (exit of personnel, entry of new personnel, and/or new members within the brigade).

The ERT has also a programmed weekly exercise schedule that develops throughout the year, in order to ensure that are able to respond to an emergency and that their skills remain current.

As indicated in Standard of Practice 7.6 cyanide emergency response mock drills are scheduled no less than two times a year, in order to test the emergency response systems and capabilities of site personnel. Various types of responses are tested including both cyanide spillages and personal contamination and intoxication scenarios.

Refresher training for cyanide events is conducted as part of the site training and mock drill programs. Training requirements from the training matrix are routinely monitored and refresher training is scheduled as required.

At the completion of emergency response mock drills and/or actual events, debrief sessions are held to review and identify the actual vs. 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

and areas, which may include modifications to training and/or awareness programs to ensure that gaps are addressed.

During the recertification period, up to three cyanide-related drills have been conducted per year. 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.

This requirement was verified through review of training records, training materials, interviews to Plant operators and Process Safety Training group staff, and discussion with personnel from the Technical Training Department, Emergency Response, Environmental and Plant Operations areas.

Records of emergency response training are documented in the training database. These include training conducted by internal and external parties. Training records are administered by the Process Safety Training group with input from the functional areas.

Samples of records were reviewed and found to be consistent and complete. Records of emergency response cyanide training and hazardous materials emergency response training are retained not only as group records, but as individual records throughout each brigade member history. The records identify the trainer, trainee, topics covered, date and sign off sheet. The results of the testing are also maintained as part of the files. Written tests are completed to demonstrate each brigade member understanding of the training materials. The training materials are either PowerPoint presentations, or the actual standard for emergency response from Merian. In the case of training developed by an external company, there is a certificate emitted for each brigade member that participated, as well as copy of the training material used.

This requirement was verified through review of training records, training materials, interviews to Plant operators and Process Safety Training group staff, and discussion with personnel from the Technical Training Department, Emergency Response, Environmental and Plant Operations areas.



Principle 9 | DIALOGUE AND DISCLOSURE

Engage in public consultation and disclosure.

Standard of Practice 9.1

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

The operation is in full compliance with
 in substantial compliance with Standard of Practice 9.1
 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 Story Boards
- Routine face-to-face meetings/engagements
- Complaints and grievances
- Site tours
- Company website: <https://www.newmont.com/operations-and-projects/global-presence/south-america/merian-suriname/default.aspx>
- 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. The Community Relations area visits the settlements and communities surrounding the mine site and along what is denominated the “Transport Corridor Communities” in the “Community Emergency Response Plan.” Merian provides the opportunity for stakeholders to communicate issues of concerns in different ways depending on the type of stakeholder, the location of them, the approach strategy, and the idiom they speak.

Related to cyanide, they are specific topics that are effectively communicated and are material of the yearly work plan from the Community Relations area:

- General scope of Merian operations.
- Use of cyanide for gold extraction.
- Cyanide transportation from Moengo Port to mine site.
- Emergency response preparedness for emergencies (including the ones that can occur during cyanide transportation):
 - Medical emergency response preparedness.
 - Environmental impact preparedness (related to soil and water contamination).
- Roles of the communities, local authorities, and Merian, in case of emergency.

With regards to cyanide management, Merian and Newmont shares information with communities about the company’s responsible management practices and offers a first-hand view of the mine site operation and cyanide facilities during site tours.



Operating practices and programs are shared with local communities and questions are answered by Community Relations and Communications areas personnel.

Stakeholder concerns or complaints identified via phone calls, tours, meetings, complaints and grievance post boxes 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 has also a grievance mechanism (External Complaints and Grievance Mechanism procedure). The purpose of the grievance mechanism is for 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 meetings with public institutions regarding cyanide use and management.

This requirement was verified through documents review, online corporate website information retrieval, and discussion with personnel from Community Relations H&S, Environmental and Plant Operations areas.

Standard of Practice 9.2

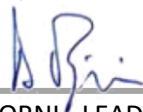
Make appropriate operational and environmental information regarding cyanide available to stakeholders.

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

Newmont utilizes a global website to share information on environmental, safety, health, and community relation topics. The access is available on the internet. It also includes information about cyanide management practices. It relates to global operations, as well as specific operations like Merian. Some of links with information related to Merian or to cyanide management are the following:

- <https://www.newmont.com/operations-and-projects/global-presence/south-america/merian-suriname/>
- <https://www.newmont.com/investors/news-release/news-details/2019/Protecting-Workers-from-Exposures-to-Cyanide/>
- <https://www.newmont.com/investors/news-release/news-details/2022/Newmonts-Approach-to-Responsible-Cyanide-Management/>

Newmont publishes its annual sustainability on its website and includes compliance reporting (<https://www.newmont.com/investors/reports-and-filings/>). This report provides a variety of sustainability event information as submitted by each mine site across the company's portfolio. Also, the Newmont website has a "Newmont News" section (<https://www.newmont.com/investors/news-release/>) with information of the sites worldwide. This section publishes relevant or important news and facts in chronological order. Within the information published, 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.

At local level, 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. Flyers and posters with the subjects “What is Cyanide,” “How Dangerous is Cyanide” and “Cyanide 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 and Transport Corridor Communities. Merian’s Social Responsibility staff regularly visits various communities to provide and share information.

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.

This requirement was verified through documents review, graphical records review, online corporative website information retrieval, and discussion with personnel from Community Relations H&S, Environmental and Plant Operations areas.

Dutch is the official language of Suriname, but the extent to which members of the various ethnic groups are able to use the language differs. Most of the population learns Dutch as a second language. Most of the business operations are carried in English (Merian uses both Dutch and English for communication inside the operation, especially in safety signage, communication panels and printed materials).

Merian has printed and digital material for use in communication with external stakeholders about the mine site's activities, in English, Dutch, Pamaka and Sranan Tongo. Nevertheless, the people in local communities, especially in the route from Moengo to the mine site, speak one of the following dialects:

- Sranan Tongo (<https://www.britannica.com/topic/Sranan>)
- Ndyuka (a.k.a. Djuka or Aukan), and
- Pamaka (a.k.a. Pamacca, Paramaka or Paramacca)

Usually, the local dialects speakers (and especially in rural areas) are illiterate. Due to the low literacy rates and various languages spoken in Suriname, face-to-face communications via Community Liaison Officers, Community Information Story Boards 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).

An important part of the work carried on by the Community Relations area staff of Merian, is to make contact with the different local communities, and carry out the meetings and dissemination of information in verbal form, using one of the three dialects listed, aside from Dutch or English. Part of the information they communicate in verbal form, is referred to the transport of cyanide by road, the use of cyanide in the mine site operation, risk of cyanide poisoning, emergency response preparedness, and preventive safety management carried on by the mine site.



This requirement was verified through documents review, graphical records review, online corporative website information retrieval, and discussion with personnel from Community Relations, H&S, Environmental and Plant Operations areas.

Merian is required to report any cyanide exposure and release incidents to the relevant national and local authorities, as the National Coordination Center for Disaster Management of Suriname. The information reported to the regulatory agencies will be made available to the public by those agencies. Also, any significant incident would be published in the main Newmont's website (<https://www.newmont.com/investors/news-release/>), as well as in the annual Corporate Sustainability Report (<https://www.newmont.com/investors/reports-and-filings/>). This annual publication is available to the public via Newmont's corporate website. Any publication regarding incidents with cyanide that may be published in any of these digital media will specify the operation in which they occurred, which may be Merian or any other from the Newmont group.

No cyanide exposures or releases have occurred at Merian during this recertification period.

