SUMMARY AUDIT REPORT

for the March 2024
International Cyanide Management Code Recertification Audit

Prepared for:
Goldcorp Canada Ltd
Musselwhite Mine

Submitted to:
International Cyanide Management Institute
1400 "I" Street NW, Suite 550
Washington, D.C. 20005

FINAL
13 July 2024

3615A, rue Isabelle
Brossard (Québec) J4Y 2R2, Canada

SUMMARY AUDIT REPORT

Name of Mine: Musslewhite Mine

Name of Mine Owner: Newmont Corporation

Name of Mine Operator: Goldcorp Canada Ltd.

Name of Responsible Manager: Mr Gordon Ruttenbur, Acting Mine General Manager

Address (Mine): **Goldcorp Canada Ltd., Musselwhite Mine**
Box 7500 Thunder Bay
Ontario P7B 6S8, Canada

Telephone: +1 (807) 928-2200
Fax: +1 (807) 928-2067

E-mail: gordon.ruttenbur@newmont.com

Location detail and description of operation:

The Musselwhite Gold Mine (MWM) is primarily an underground mine operated by Goldcorp Canada Ltd., a wholly- owned subsidiary of Newmont, Inc. Gold production commenced in 1997 and the mine currently employs about 500 people. The mine is located in the Patricia Mining District within the Skinner and Zeemel Lakes Areas on the south shore of Opapimiskan Lake, in Northwestern Ontario, Canada. The region is approximately 320 m above sea level, relatively flat, and covered by a variety of surficial glacial deposits creating a landscape with numerous streams, ponds and lakes and extensive low-lying swampy areas. The climate is continental with average temperatures varying from -19°C in January to 17°C in July. Annual average precipitation is about 730mm with approximately 260 mm of this falling as snow.

MWM is a fly-in / fly-out operation and is situated approximately 130 kilometres (km) north of the Town of Pickle Lake and 470 km northwest of Thunder Bay, Ontario (Figure 1). Seven communities, including five First Nation communities, with a combined population of approximately 4,000 are located within the vicinity of the mine. The nearest community is Kingfisher Lake, 48 km to the northeast of the site.

MWM receives cyanide by truck in solid briquette form in 1-tonne Eco-Paks and stores them in a secure designated area in the reagent warehouse located near to the mill.

The operation uses conventional crushing/rod milling/ball milling for size reduction and incorporates a gravity recovery step in the ball mill circuit and ConSep Acacia reactor for gold recovery. Between 26% and 30% of the gold is recovered by this means. 93% of the remaining gold is recovered by conventional batch leach and carbon-in-pulp (CIP), bringing the total gold recovery rate to 95.5%.

Figure 1: Location of Musselwhite Mine, Ontario

The mill operates four leach tanks, and six CIP tanks. Loaded carbon from the CIP circuit passes through an elution column using a caustic-cyanide solution to strip the gold. The tailings from this process is washed with incoming tailings reclaim water in two counter current decantation (CCD) thickeners to recover cyanide in the overflow which is recycled as

process water fed to the grind circuit. Residual cyanide is treated by an INCO SO_2 cyanide destruct reactor (CDR) system (prior to being pumped to the tailings thickener plant (installed in 2010), located in the Tailings Storage Facility (TSF) approximately 3 km west of the mill, where the tailings are thickened to approximately 66% solids. The thickened tailings are then spigotted within the TSF. Tailings lines (a short and long line) and reclaim line are installed such that they are spill protected using ditching and spill collection ponds. The tailing solids settle within the impoundment, or tailings area, while the supernatant is contained as the reclaim pond. The tailings area consists of a shallow, valley-like depression that is contained by a series of seven engineered, low permeability dams (A-G) flanking the south and east sides of the tailings area. A Separation Dyke divides the TSF to separate the tailings deposition area from the tailings pond. Seepage through dams is collected and contained in a seepage collection pond and pumped back to the tailings area when necessary. Additionally, a groundwater interception system was installed in 2010 to intercept a sulphate plume identified migrating from the toe of dam B of the TSF toward Zeemel Lake approximately 500 m south. About 75% of the tailings solution discharged to the tailings pond is returned to the mill process.

Surplus water from the mill (as well as mine dewatering and precipitation inflow) is stored in the TSF and seasonally discharged to the receiving environment via two polishing ponds to maintain a controlled water elevation within the tailings pond. Water discharges by gravity from the polishing ponds through a treatment wetland that discharges through a flume into a permitted mixing zone in Lake 282 on the Paseminon River.

SUMMARY AUDIT REPORT

Auditors' Finding

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance

with the *International Cyanide Management Code.*

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

Audit Company: Terrapex Environnement Ltée
3615A, rue Isabelle
Brossard (Québec)
J4Y 2R2, Canada

Audit Team Leader: Jean-Marc Léger
e-mail: jean-marc.leger@terrapex.ca

Names and Signatures of Other Auditors

Technical Auditor: John Lambert, EP(CEA)
e-mail: lambertenvironmental@gmail.com

Date(s) of Audit: 6 March through 11 March 2024

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute (ICMI) and that all members of the audit team meet the applicable criteria established by the *International Cyanide Management Institute* for Code Verification Auditors. I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the *International Cyanide Management Code Mining Operations Verification Protocol* and using standard and accepted practices for health, safety and environmental audits.

Musselwhite Mine
Name of Mine

Signature of Lead Auditor

13 July 2024
Date

SUMMARY AUDIT REPORT

1. PRODUCTION **Encourage responsible cyanide manufacturing by purchasing from manufacturers who operate in a safe and environmentally protective manner.**

Standard of Practice

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

Over the past three years the MWM has continued to purchase cyanide from Draslovka Mining Solutions (Draslovka), formerly E.I DuPont Demours, and then Chemours Company, Memphis, Tennessee Plant, in the United States. The contract, originally set up under E.I DuPont Demours is now operating under a third amendment to the Supply and Sales Agreement that was endorsed on 1 January 2020 and extends the terms of the original contract to 31 December 2024. Draslovka has maintained certified status of the Memphis Plant for the whole recertification period as verified in report.

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

Standards of Practice

2.1 Require that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training and emergency response.

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 2.1.

Summarize the basis for this Finding/Deficiencies Identified:

Empress Express Inc. continues to be the only transporter used by Draslovka transport cyanide between the Memphis plant and the mine site. Empress Express has maintained certified status for transport of cyanide between the Memphis Plant and Canada for the whole recertification period as documented in report.

3. HANDLING AND STORAGE **Protect workers and the environment during cyanide handling and storage.**

Standards of Practice

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 3.1.

Summarize the basis for this Finding/Deficiencies Identified:

MWM has designed and constructed the warehouse and mixing area for solid cyanide in accordance with sound engineering practices. Cyanide is only delivered in solid briquette form in 1-tonne Eco-Paks. The only changes to these facilities since the previous recertification audit in 2020, are the upgrade of the cyanide reagent lines, and modification of the sump pump distribution pipelines. These changes were undertaken using sound and accepted engineering practices as discussed under Section 4.8.

The warehouse and mixing area at the Musselwhite Mine are located away from people and surface water. Both facilities have containment measures to prevent releases. The entire processing area also has storm water controls to reduce runoff from reaching and potentially impacting surface water. With the exception of the Mill control room and adjoining lunchroom located on a mezzanine near the centre of the Mill, there are no areas where workers congregate in the vicinity of the warehouse and mixing area. With respect to potential for exposure to the general public, the mine is a fenced secure area and there are no towns or houses in the vicinity.

MWM has installed ultrasonic level sensors in the cyanide mixing tank and storage tank that will alarm at 90% (high) and 95% (critical high) in the control room to warn operators to implement measures to prevent overfilling. There is also a level readout and Human Machine Interface (HMI) screen at the mix plant that operators monitor. The level sensors

have been maintained on a quarterly preventative maintenance (PM) schedule over the past three years. Procedures for the cyanide mix operation ensure the mix tank level is no greater than 10% prior to beginning a mix.

The cyanide mixing tank and storage tank are located within a competent concrete bermed secondary containment basin constructed of cast-in-place reinforced concrete to provide a competent barrier to prevent seepage to the subsurface. The tanks sit on concrete plinths constructed on the basin floor. The containment configuration has not changed since the 2020 recertification audit and was observed to be in good condition. The containment is inspected daily as part of routine shift inspections and monthly as part of planned general inspections.

Cyanide is stored under a roof in a metal clad warehouse that protects the Eco-Paks from precipitation. Within the building, the cyanide is stored within a bermed and sloped concrete floor with a grated catch channel at the downslope edge to reduce the potential for contact with water. The warehouse has rollup doors at either end of the building that are provided with open segments that allow adequate ventilation to prevent the potential buildup of hydrogen cyanide (HCN) gas. The warehouse is locked, and distribution of the key is limited to authorized personnel to prevent unauthorized access. The outside of the warehouse is monitored by a security camera.

Other reagent materials are also stored in the warehouse. At the time of the site audit sacks of Sodium Nitrate, a strong oxidizer, were observed near to the fence in close proximity to the cyanide. MWM immediately moved the nitrate sacks, subsequent to completion of the field component of this recertification audit, MWM updated the cyanide unloading procedure to stipulate that incompatible materials were not stored within 3 m of the cyanide containment and placed signage in the warehouse stipulating the same. No food, animal feeds, or tobacco products were stored in the warehouse.

Eco-Paks are only transferred to the mill as needed for a cyanide mix. They are placed within a designated area near the cyanide mix plant to ensure separation from materials incompatible with cyanide. The cyanide mix and holding tanks are located with a dedicated containment basin. The mill is equipped with an exhaust system to prevent the build-up of HCN gas. The mix and holding tanks are connected to an extraction fan that is activated prior to a mix to prevent HCN gas entering the workplace. Only authorized personnel may enter the mill and the reagent area is cordoned off prior to a mix to restrict access.

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
in substantial compliance

not in compliance…with Standard of Practice 3.2.

Summarize the basis for this Finding/Deficiencies Identified:

The operator uses a curved water-spray wand after the briquettes have been released to the mix tank to thoroughly rinse the bag inside and out. After the bag has stopped dripping, it is lowered into the tank containment basin to allow any excess water to drain into the containment. Empty cyanide Eco-Paks and wooden pallets are burned to prevent them being reused. The written procedure requires that the mixing operator marks "BURN" on the empty container components prior to the forklift operator transporting them to the burn pit located at the TSF. The container number is recorded and signed by the forklift operator as confirmation of transfer to the burn pit. The empty Eco-Paks and wooden pallets are temporarily stored in the burn area and periodically burnt. Signage in the burn area notifies personnel that access is permitted only to authorized personnel. No signage was observed to warn personnel that the waste may contain cyanide. Subsequent to the field component of the audit MWM provided the auditors with photographs showing that cyanide warning signage had been posted at the entrance to the burn pit

MWM has developed and implemented an unloading procedure to prevent cyanide exposure and rupturing/ puncturing of containers, and limit the maximum height that Eco-Paks are stacked in the warehouse; cyanide mixing procedure that details required PPE, need for two operators to be present during a mix, operation of valves, agitators, pumps, exhaust fans, and cranes during a mix, and cyanide spill response procedures for spills in and out of containment. The mixing procedure also addresses the requirement for addition of colorant dye. Daily operator and planned monthly maintenance inspections are in place for pumps, fans, piping and include instruction that specifically addresses red dye as an indicator of solution leaks.

A cyanide mix was observed during the site visit. The reagent operator and crane operator had donned PPE as specified by the procedure; however, based on the activities being performed a concern of potential cyanide exposure risk was noted from using the selected PPE. This issue is further addressed in Standard of Practice 6.1.

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

Standards 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
in substantial compliance
not in compliance…with Standard of Practice 4.1.

Summarize the basis for this Finding/Deficiencies Identified:

The cyanide facilities at MWM are largely unchanged from the previous recertification in 2020 with the exception of modifications to the TSF, upgrade of the cyanide reagent pipelines and modification to the cyanide mix area sump distribution piping. The cyanide facilities, defined as facilities with weak acid dissociable (WAD) cyanide greater than 0.5 mg/L or included by default (e.g., cyanide storage warehouses), are:

- Reagent warehouse
- Mill, including the grinding, acacia, leach, and CIP circuits, the CCD thickeners, barren and process water tanks, and elution, cyanide destruct, and cyanide mixing and storage tanks, and associated piping.
- Tailings thickener at the TSF.
- TSF, including tailings and reclaim pipelines between the mill and TSF.

Written management and operating plans and procedures have been developed to manage these facilities to ensure they are operated in a safe and environmentally sound manner and in compliance with regulatory requirements. These plans and procedures were originally developed and managed though Goldcorp's management system (SEMs). Since the 2020 International Cyanide Management Code (ICMC) recertification audit these have now been integrated into the *NEM-HEA-STA-010 Fatality Risk Standard (FRS) Hazardous Materials* introduced when Newmont acquired Musselwhite. The FRS specifically addresses cyanide and requires adherence to ICMC principles, risk assessments, and management practices for storage and use. Critical control verifications (CCVs) that align with the FRS have been developed and implemented for cyanide. These are available on hand-held devices so conduct reviews of critical cyanide management areas can be undertaken in the workplace.

Plans and procedures identify the assumptions and parameters on which the facility design was based and specify operating requirements to prevent cyanide releases. The operating requirements are set out in the *Amended Environmental Compliance Approval No. 5276-CDTGPL* dated 25 July 2022, and issued by the Ontario Ministry of Environment, Conservation and Parks (MoE). The Approval defines the design capacity and maximum dimensions and construction requirements of the TSF, the deposition strategy for the tailings, the inclusion of seepage collection ditches, collection ponds and interception system, minimum free board, discharge management and environmental monitoring and reporting requirements, compliance limits for various groundwater and surface water analysis, including total and WAD cyanide. These Approval requirements are integrated into MWM's plans and operating

procedures.

The Approval only permits discharge to the environment between 15 April and 30 November of each year. The water balance is therefore managed to ensure adequate capacity is available to retain the extreme storm event known as the "Timmins storm" of 193 millimeters in 12 hours in the TSF during the critical period just prior to the start of the discharge season. Procedures are in place to monitor cyanide concentrations in the polishing pond to ensure the regulatory effluent discharge limits are not exceeded. These procedures also ensure that discharge concentrations do not exceed the Cyanide Code 0.022 mg/l free cyanide limit for the protection of aquatic life.

The procedures describe the risks involved with various activities (including unloading, storage, process operations, entry into confined spaces, and equipment decontamination), specify personal protective equipment (PPE) requirements, and detail the steps required to safely complete each work task. These procedures and programs are largely unchanged since the previous recertification audit except for minor edits, format changes associated with moving from the Goldcorp to the Newmont management system, and ongoing periodic review and sign-off.

MWM has written procedures for routine inspections of the mill cyanide circuits, mix area, cyanide storage, tailings and reclaim pipelines, and TSF for structural integrity and tailings/water management. Management also conducts regular planned general inspections (PGIs) of all mine areas. In addition, workers complete 5-point Safety Card Work Area reviews prior to undertaking any work task. The inspection procedures are generally unchanged since the 2020 recertification audit. Procedures and plans are also in place for environmental monitoring of surface water, groundwater, and wildlife.

MWM continues to use the System Applications and Products in Data Processing (SAP) system to plan and track preventive maintenance (PM) and corrective maintenance. The system encompasses critical machinery, tanks, pumps, valves, electrical instrumentation, sensors, and other equipment involved in the management of cyanide. The system has undergone significant changes since the 2020 recertification audit to align the maintenance asset nomenclature with Newmont's asset structure and naming system. Maintenance activities are further discussed below.

MWM has a management of change (MOC) procedure managed through the Cyanide Code Steering Committee (CCSC) that requires completion of a formal risk assessment review of all changes at the site. The procedure requires the initiator to complete a change request form to determine if a risk assessment is needed and which departments require notification and form part of the risk review team. The formal risk assessment process includes evaluation of the proposed change, documentation of recommended controls to eliminate or mitigate risk,

assignment of responsibility for implementing the controls, and setup of due dates to complete the changes. Tasks related to the changes are tracked to completion.

Of four change management reviews conducted in the past three-year period, three have been implemented. Records on file for the above MOC reviews revealed that although the proposed changes were evaluated by the CCSC and the intent of the MOC procedure was observed, the procedure was not being followed as the FRA forms were not completed to document the risk evaluation process, no records were available regarding assignment of tasks to implement controls and no completion schedules were provided to record when controls were to be implemented. Also, there was no sign-off confirmation that both the Sustainability and Safety departments had approved the change. Subsequent to the field component of the audit, MWM implemented correction measures to ensure future conformance was provided to the audit team as evidence that these measures had been implemented. These included completed documentation related to a proposed change that entailed modification of the PPE used during a cyanide mix, department sign-off (including Sustainability and Safety departments), screen shot computer entries showing assignment to implement controls, and completion schedule for each task.

MWM has established procedures, actions, or continency measures to apply to each process circuit or tailings deposition operation for different situations, including normal operation, and various start-up, shutdown or upset scenarios, to maintain or reestablish the tailings production and management within the performance targets. A tailings and water storage facility emergency response plan is also maintained to enable effective response to a potential emergency event that could result in a release of tailings and/or water. The Plan includes a trigger-levels that address actions to be taken, depending on defined green, yellow, and red risk levels, in the event of abnormal instrumentation readings from dam and dyke geotechnical instrumentation.

A mill shutdown procedure is in place that standardizes the guidelines and operating conditions for the mill and crusher when entering a shutdown state to ensure safe and efficient operation. The procedure includes planned and unexpected shutdowns for various shutdown states including short shutdowns (1 to 3 days), long shutdowns (3 to 14 days), extended shutdowns (14 days to 3 months) and temporary cessation of operations (over 3 months) for each of the process circuits and the TSF, and stipulates the minimum number of operators that must remain at the facility to inspect, monitor and provide care and maintenance, as well as the required emergency response staff to be onsite for the duration of the shutdown.

Documented inspections and monitoring programs are conducted of cyanide facilities to confirm their integrity and continued operation within design parameters. Shift inspections of the mill and thickener plant are conducted three times a shift and include checking tanks for signs of corrosion and leakage; containments are clear or debris and in good condition; and pipelines, valves, and pumps for signs of deterioration and leakage, and adequacy of

labelling, and integrity of the tailings and reclaim pipelines. In addition, managers conduct monthly planned general inspections. These visual inspections are supplemented with the preventative maintenance program and annual non-destructive testing (NDT) of tank walls and periodic NDT of the tailings and reclaim lines.

Tailings operators inspect the TSF three-times a shift checking for potential erosion, washouts, and cracks in the embankments; operation of pumps; and flow in transfer and discharge lines. The Responsible Tailings Facility Person conducts daily inspections of the tailings discharge spigots; condition of the embankments, spillways, diversion channels and culverts; and elevations of the reclaim pond, and depth of water at the barge. The integrity of the TSF and management of tailings deposition and water balance are also inspected and reviewed annually by the Engineer of Record.

In addition to the above inspection programs, workers are required to perform 5-Point Safety Work Area Reviews prior to starting work. These area reviews area completed with a supervisor and documented on work area inspection cards.

During the audit, housekeeping was observed to be good, no corrosion, leaks or salt build-up was evident, lockouts were in place on critical valves, labelling was generally good, and containment areas were well maintained and free of equipment, debris and slurry that could compromise containment capacity. Based on these observations it is the auditors' opinion that the inspection and maintenance programs are conducted at a frequency sufficient to assure and document that cyanide facilities are functioning within design parameters.

Inspections are documented on operating sheets, log sheets, and forms. These documents include cells for recording the name of the inspector(s), date of the inspection, and time of the inspection and comments regarding deficiencies or abnormal conditions noted. Deficiencies are communicated to maintenance planners for entry into a weekly maintenance planning schedule. The Process Department meets twice a week with the Asset Planner to review the schedule and align the maintenance within the day-to-day process operation as required.

A review of a selection of inspection records revealed that mill operators were not consistently fully completing checkboxes with the information sought. Subsequent to the field component of the audit MWM implemented a program to retrain mill operators on documenting inspections and to reinforce the importance of fully completing the daily operating sheets. MWM also implemented a verification system where Mill Team Leads are now required to check and sign-off that the sheets are fully completed. An inspection item has also been added to the monthly planned general inspections to confirm that inspections are fully documented.

MWM continues using the SAP software for managing preventative and corrective maintenance of cyanide facilities. The only significant change in the past three years is the modification in asset nomenclature to bring the SAP database in line with Newmont's system after the acquisition of Musselwhite from Goldcorp. In addition to the effort and time invested, this modification has also required planners and SAP users to become familiar with using and searching within the new system. Equipment associated with cyanide has been identified with a unique tag, allowing a history of maintenance orders related to cyanide equipment to be easily searched and generated as a report. Equipment is searchable by area, allowing planners to quickly locate an asset in the system.

The SAP system generates PM actions based on a predetermined maintenance schedule, or upon generation of work orders (WO) in daily response to specific inspection observations or observed operational needs. The system manages electrical and mechanical maintenance as well as non-destructive testing programs for tanks and piping. The Asset Planner generates a maintenance schedule once a week and meets twice a week with the Process Department to review the schedule and align the maintenance within the day-to-day process operation as required.

MWM purchases electrical power from Ontario Hydro. The power is delivered via a commercial power line from Ear Falls Substation in Pickle Lake and a 200 km line owned by MWM between Pickle Lake and the mine. In the event of a power outage, MWM has four diesel generators for the underground mine, and five diesel generators for the mill. The generators are tested weekly by MWM maintenance staff, and a third-party contractor performs preventative and corrective maintenance on the generators based on hours of generator operation.

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
- in substantial compliance
- not in compliance…with Standard of Practice 4.2.

Summarize the basis for this Finding/Deficiencies Identified:

The ore processed at MWM is generally consistent and does not require ongoing testing to check optimum cyanide addition rates. However, periodic bottle roll tests are conducted in-house on an add needed basis for forecasting purposes. Optimal cyanide addition to the leach circuit has been between 400 mg/l and 500 mg/l, during the past three years. The cyanide addition set point at the time of the site visit was 440 mg/l. Cyanide use is optimized by monitoring concentrations in the leach circuit using a TAC-1000 analyser and manual testing. The cyanide flow is monitored in the control room and operators can adjust the cyanide

addition as needed to maintain the desired cyanide concentration in the leach slurry. Manual titrations are performed every four hours on samples collected from selected leach tanks and the thickener overflow.

MWM continues to use lead nitrate in the leach process to reduce cyanide consumption. The lead nitrate counters the negative effects of sulphide in the ore to enhance the ability of cyanide to extract gold and thereby reducing the amount of cyanide needed for the process.

MWM also minimizes use of cyanide by recovering overflow from the thickener and recirculating cyanide back to the process via the grind circuit. The cyanide recovery is tracked as the waste effluent ratio (weight of cyanide added to the process divided by the weight of cyanide recovered at the thickener overflow). The cyanide recovery rate varies between 45% and 60% and the operational waste efficiency target set at 50%.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 4.3.

Summarize the basis for this Finding/Deficiencies Identified:

At the time of the 2020 ICMC recertification audit MWM was using a GoldSim® water balance that focused on management of the TSF. In 2021 this comprehensive, probabilistic model was revised to a become a site-wide water balance and water quality model. The water balance is currently only calibrated for the TSF. The other facilities including the seepage collection pond and the polishing ponds, open pit and wetland areas still require calibrating and MWM was in the process of obtaining the relevant survey data required to do this.

Inputs to the TSF include the thickened tailings (70% solids), thickener overflow discharged to the TSF supernatant pond, treated sewage sludge, and water pumped from the underground mine. The TSF is designed, based on a maximum water level of 306.5 m, to contain the extreme design 1,000-year 12-hour storm event of 193 millimeters, below the spillway invert elevation (307.5 m level). The emergency spillway is designed to safely convey the probable maximum precipitation (PMP) storm event (1,000-year 24-hour event of 397 mm) to the polishing ponds downstream of the TSF. The original design of the TSF was based on historic climate data provided by the Government Canada weather station at Pickle Lake (1990 – 2020). This data has recently been supplemented with precipitation and temperature data collected from an on-site weather station. The model also includes options for modelling climate change trends based on published predictions. TSF is configured as an above-ground ring dyke so that there is no run-on to the facility.

Snowmelt is modelled in April and May as a function of temperature. Snowpack is measured at a designated representative location near the mine office. Solution losses from the TSF include evaporation, excess water pumping to the polishing ponds, and in the event of elevated water levels, spillway discharge to the polishing ponds. Seepage losses to groundwater are not modelled, as seepage collected in the seepage collection pond, seepage collection ditch and groundwater interception system and pumped back to the TSF. The seepage collection pumps at the base of the TSF are connected to the emergency power system so they will continue to operate if a power failure occurs.

The CDR is operated to maintain cyanide in tailings discharged from the Tailings Thickener to the TSF at less than 2 mg/l WAD cyanide. As a result, the concentration of WAD cyanide in the supernatant pond has averaged around 0.2 mg/L over the past three years. All direct discharge from the TSF passes through two polishing ponds and wetland area prior to final discharge. No discharge is permitted unless the water meets permit criteria. The phreatic surface in the TSF is monitored by automatic readout piezometers within the TSF basin. The elevation of the tailings is recorded daily from staff gauges and periodic photogrammetry drone surveys are performed to verify the elevation of the tailings.

The TSF is designed and operated to retain the storage capacity to contain the design storm event below the spillway invert elevation (307.5 m). The current maximum operating water level for the TSF is 306.5 m. The emergency spillway is designed to safely convey an event up to the probable maximum precipitation (PMP) to the Polishing Ponds downstream. The dam crest is set at elevation 309 m, to accommodate wave run-up and conveyance of the PMP through the emergency spillway. This provides a minimum required freeboard of 1.5 m to protect the dam crest from wave action.

Inspection and monitoring activities are in place to ensure the integrity of the TSF and to maintain the water balance to prevent overtopping of ponds and unplanned discharges to the environment. These include inspection and monitoring of the TSF, seepage control pond, polishing ponds, and wetland treatment area. Staff gauges are installed on all ponds and level sensors on the reclaim barge pump report real-time water levels on the HMI. There is also a level sensor on the seepage collection pond. Operators read staff gauges at the reclaim pond and seepage pond daily, and a survey of the water surface elevations of the TSF, seepage pond, and polishing ponds is conducted monthly by Environmental staff. Periodic photogrammetry drone surveys are also performed to verify the elevation of the tailings. The water elevations, together with readings of pumped water volumes to and from the TSF and between ponds, and volume of water discharged, are input into the water balance.

In the unlikely event that an unplanned discharge was to occur, the concentration of cyanide entering the environment would be low because the Mill is operated and closely monitored to

maintain WAD cyanide concentrations in discharge to the TSF to below 2.0 mg/l WAD. The polishing ponds and wetland treatment area would further reduce the cyanide concentration in the discharge.

The water balance model uses climate records from 1990 to 2024 obtained from the Meteorological Station at Pickle Lake. MWM also collects data from an onsite weather station and nearby snowfall and evaporation monitoring points. The data from the weather station is downloaded and compiled by staff monthly. Data added to the model since 2021 has largely been that collected from the site, supplemented with Pickle Lake data if any down time/gaps occur in the site station. The lasted update of the model at the time of the site audit was February 2024. The model updates allow simulation of various scenarios, as the facility changes over the life of the mine, and comparison of those changes against the design criteria and operating assumptions, allowing revision of operating practices as necessary.

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 4.4.

Summarize the basis for this Finding/Deficiencies Identified:

Measures to restrict access by wildlife and livestock to open waters are not required as there are no open water bodies where WAD cyanide exceeds 50 mg/l. The Mill is operated and closely monitored to maintain cyanide concentrations in discharge to the TSF below 2.0 mg/l WAD cyanide. Operators sample and analyze the Tailings Thickener discharge every 4 hours to confirm discharge does not exceed 2.0 mg/l. In addition, the Environmental Department collects samples monthly of the Tailings Thickener overflow from the reclaim pond to ensure WAD cyanide does not exceed permit limits.

All employees and contractors are trained to report any wildlife mortalities to the Environmental Department. Procedures are also in place to undertake necropsy analysis on carcasses where the cause of death is unknown, including mortalities where cyanide poisoning is suspect. Records for the past three years show 13 mortalities comprising 5 birds and 8 mammals. None have been attributed to cyanide.

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
- in substantial compliance

not in compliance…with Standard of Practice 4.5.

Summarize the basis for this Finding/Deficiencies Identified:

MWM's operating permit allows discharge to surface water between 15 April and 30 November each year. Discharge from the TSF passes through the two stage Polishing Pond and then a treatment wetland area prior to release along a riprap channel to Lake 282. During the discharge season WAD cyanide concentrations are monitored weekly where the effluent enters the treatment wetland; thrice weekly where the effluent leaves the treatment wetland, and monthly at the permitted end of mixing zone for the discharge into Lake 282. Data covering the past three years showed the WAD cyanide never exceeded 0.5 mg/l at any of these sample locations. The results of analysis also showed that WAD cyanide at the end of mixing zone in Lake 282 never exceeded the 0.005 mg/l detection limit for the method of analysis, demonstrating free cyanide concentration below 0.022 mg/l.

MWM has not caused cyanide concentrations to rise above standards in surface water and is not engaged in surface water remedial actions. Controls are in place to manage indirect discharges to surface water and MWM can demonstrate that indirect discharges to surface water have not resulted in free cyanide greater than 0.022 mg/l. The Mill has concrete floors and secondary containments to prevent infiltration to groundwater and the tailings and reclaim pipelines are provided with secondary containment and spill prevention. There have been no reported spills outside of containments that would suggest the potential for indirect discharges from the Mill operation. Seepage does occur from the TSF, but this is controlled and monitored to prevent indirect discharge to surface water.

Surface water analysis results covering the past three years from samples collected from Lake 282 and Zeemel Lake down gradient from the operation show WAD cyanide below the detection limit of 0.005 mg/l, demonstrating a free cyanide less than 0.022 mg/L in all samples and that these surface water bodies have not been impacted from indirect discharges.

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 4.6.

Summarize the basis for this Finding/Deficiencies Identified:

Engineering structures and water management measures to manage seepage remain largely unchanged from those in place at the time of the 2020 ICMC recertification audit.

The Mill has concrete floors and secondary containments to prevent infiltration to groundwater. The tailings and reclaim pipelines are provided with secondary containment and spill prevention. The tailings embankments have clay cores and are underlain by a clay layer and/or glacial till that minimizes seepage. Seepage at the TSF is directed through underdrains or finger drains to the seepage control pond. A groundwater interception system is also in place to control a sulphate plume extending from the south side of the TSF.

As documented in the 2020 ICMC recertification audit there is no designated beneficial use for groundwater, nor any points of compliance or actual points of use. MWM has voluntarily therefore adopted a groundwater standard of 5 times the surface water standard (i.e., 0.02 mg/l) for WAD cyanide in groundwater. This is included as a standard in the operating permit.

Except for the addition of five new monitoring wells to the north and west of the TSF installed in 2023 and eleven wells installed within the TSF (eight in 2021 and three in 2023), the array of monitoring wells and groundwater monitoring program is basically the same as was in place during the 2020 recertification audit. Most wells are located down gradient of the TSF, and several are multilevel wells. In total there are about 75 wells, with around 100 sampling points when including the sampling in the multilevel wells. Based on the requirements of the operating permit, the wells are sampled one, two, three or four times a year. Groundwater monitoring results to date have identified no exceedance of the 0.02 mg/L WAD cyanide standard.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 4.7.

Summarize the basis for this Finding/Deficiencies Identified:

Spill prevention and containment measures are in place and generally unchanged since the previous ICMC recertification audit. Secondary containment is provided for all cyanide mixing, storage, and process solution tanks at the mill. Although the Tailings Thickener Building is located within the TSF perimeter dyke, secondary containment in the form of concrete flooring and berm is in place to retain spillage within the building footprint. However, an incident in early 2023 resulting in overflow of the process water tank and spillage exiting the door of the buildings onto frozen ground outside. The process tank overflow was caused by an underflow pump slowing, and escape from the building containment occurred when the sump pump tripped out. The process water spill contained 2.5 mg/l WAD cyanide but was still retained

within the TSF. Following the incident MWM increased the containment capacity of the building by construction a concrete berm around the door. The auditors observed the secondary containments and sumps to be in good condition during the site visit.

With exception of the addition of a berm around the door of the Tailings Thickener described above, there have been no changes to the secondary containments since the previous recertification audit. Therefore, as validated in the 2021 recertification audit report, the secondary containments are all sized to hold at least 110% of the volume of the largest tank or vessel within its containment. Sumps are located in each of the secondary containments to remove cyanide solution or cyanide-contaminated water that collects. The sumps are equipped with level gauges and automatic pumps to return solutions to the process circuit.

The pipelines within the mill and the tailings thickener building are located over concrete containment and are fully contained within the building. The integrity of the containments and pipelines are checked daily during daily inspections around the mill and tailings thickener.

The tailings and reclaim lines are routed along a clay lined ditch and through culverts beneath roads and through a tunnel under the airstrip. Two dump ponds are located in topographical sags along the pipeline route to retain spillage if a leak were to occur. Spill prevention measures are also in place. The lines are inspected 3-times a day for potential leakage and pressure sensors on each end of the tailings lines that report to the HMI in the control room. A pressure differential alarm would trigger to indicate a potential tailings line failure if there is a significant change in flow rate between the sensors. In addition, NDT is periodically conducted to monitor pipeline wall thickness of the tailings line.

As determined in previous ICMC audits all cyanide tanks and pipelines are constructed of materials compatible with cyanide and high pH conditions. Since the previous recertification audit, the only changes to cyanide tanks and piping were the replacement of all existing (HDPE) cyanide reagent distribution lines with welded stainless-steel lines, and, as an increased safety measure, modification of the sump discharge piping for the cyanide mixing area sump to provide a three-way piping system to allow solution to be pumped to the Cyanide Mixing Tank, CDR Tank or Final Tails Box, rather than just the Cyanide Mixing Tank. This piping modification was made using carbon steel.

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
- in substantial compliance
- not in compliance…with Standard of Practice 4.8.

Summarize the basis for this Finding/Deficiencies Identified:

MWM has implemented quality assurance/ quality control (QA/QC) programs during the construction of the cyanide facilities. The only substantial modifications to the cyanide facilities since the 2021 recertification audit relate to additional earth construction works at the TSF and the pipeline modifications in the Mill. Therefore, the findings of the 2020 recertification audit are still valid. During this recertification audit period, QA/QC documentation and as-built certification were available for all construction works completed in the past three years.

Construction works associated with the TSF since the 2020 recertification audit are documented in construction completion reports that include descriptions of work completed, QA/QC records and as-build engineering drawings. Construction completion reports are available for the 2019 Dyke Raise, 2020 & 2021 Separation Dyke Foundation Platform Widening & South Dyke Extension, and the 2022 Stage 7 North Dyke Raise and North Dyke Extension.

Cyanide construction works completed at the Mill since the 2020 recertification audit entailed the replacement of all existing HDPE cyanide reagent distribution lines with welded stainless-steel lines, and modification of the sump discharge piping for the cyanide mixing area sump to provide a three-way piping system to allow solution to be pumped to the cyanide mixing tank, CDR tank or final tails box, rather than just the cyanide mixing tank. On completion of the reagent piping installation, MWM was provided with the as-built engineering drawings, QA/QC records, Technical Standards and Safety Authority (TSSA) registration, fabrication and pressure test certificates of compliance and letters of conformance. On completion of the sump discharge piping modification MWM was provided with the as-built engineering drawings, QA/QC records and letter of conformance.

The construction completion reports for the TSF construction projects included copies of as-built engineering drawings, daily construction records with photographs, laboratory testing results (grain size analysis, compaction tests), and field density testing. The cyanide pipeline construction records include as-built engineering drawings and QA/QC records (including material specifications sheets and certificates, weld tests, pipeline pressure tests, and fabrication inspection and testing records). The material testing and field inspection records were each signed by appropriately qualified inspectors and were included either as appendices in a construction completion report signed and stamped by an authorized person of the engineering company, or, accompanied by a letter of conformance signed and stamped by an authorized person of the engineering company.

MWM has retained QA/QC records. Hard copies of engineering documents are stored as hard copies in the central filing system in the Mill Library located in the Mill Expansion Building.

Newer documents are stored on-line on MonitorPro, the data management and reporting software used by MWM.

All engineering design and construction works completed since the last ICMC recertification audit were approved by experienced engineering companies. Prior construction works were verified during previous ICMC certification and recertification audits.

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 4.9.

Summarize the basis for this Finding/Deficiencies Identified:

MWM has written surface water and groundwater monitoring procedures that were developed to meet the monitoring requirements of the operating permit and follow MoE guidelines for sample collection and handling. MWM also has a written b*iodiversity action plan that* requires wildlife sightings or mortalities found on the mine property to be recorded.

The original environmental monitoring program was designed and approved as part of the monitoring requirements of the initial MoE Environmental Compliance Approval. The sampling and analytical protocols were developed in 1997 in alignment with MoE guidance and follow recommended regulatory requirements. The protocols are reviewed periodically by appropriately qualified MWM environmental professionals with degrees in environmental sciences and or engineering, and several years of experience in environmental monitoring and regulatory compliance.

Some in-house analysis of water sampling is conducted at the Mine laboratory. However, MWM has contracted ALS Canada Ltd. (ALS) laboratory in Thunder Bay to analyze water samples for all analysis required by its permits, including Total and WAD cyanide in water. ALS is currently certified by the Canadian Association of Laboratory Accreditation. ALS provides MWM with the appropriate sampling bottles needed for the type of sampling that is required.

The procedures specify field and laboratory methods for sampling and analysis of surface water, groundwater, and soil, as well as specific guidelines for filling out chain of custody forms and shipping samples. *They include* construction details, locations, and sampling frequencies for groundwater wells; lists regulatory criteria and water quality objectives; lists sampling equipment; details: purging wells and sampling methods, equipment decontamination, maintenance and storage, QA/QC protocols, and filling the field logbook,

and reporting requirements for non-compliance analytical results.

Field conditions are documented in environmental field books that are maintained and archived by the Department. Instructions on use of the book are provided in the groundwater and surface water sampling procedures. Information recorded in the field book includes sample number, initials of sampler, date and time, weather conditions, water levels, sample conditions and well purge information (pH, conductivity, dissolved oxygen, volume purged), and a comments section for recording any unusual/notable conditions that could influence the analysis results. Selected information from each field sampling session is transcribed in MonitorPro.

Considering the current operational management and analytical record in which WAD cyanide discharge concentration are limited to below 2.0 mg/ml in the TSF, and the results of surface and groundwater monitoring to date that show the WAD cyanide consistently below 0.005 mg/l, it is the opinion of the auditors that the groundwater and surface water monitoring program is adequate. Also, WAD cyanide concentrations in the TSF are low and no cyanide related wildlife mortalities have been reported, it is the auditor's opinion that the wildlife monitoring and reporting procedures adequately monitor for potential impact of cyanide on wildlife.

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

Standards of Practice

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of 5.1.

Summarize the basis for this Finding/Deficiencies Identified:

A mine-wide closure plan has been developed for the operation. The Closure Plan last amended in 2019 provides a conceptual plan for overall mine closure and land rehabilitation for permanent closure in 2028. Cyanide facilities closure is briefly addressed and refers to the Cyanide Facilities Decommissioning Plan (CFDP) for further detail and costs. The most recent update of the (CFDP), dated July 2020, details the sequence for decommissioning, detoxification, and dismantlement of cyanide facilities. The costs associated with these

activities are updated annually and included in the (Standardized Reclamation Cost Estimator (SRCE) model.

Appendix K of the Closure Plan contains a schedule for overall decommissioning of the mine site in terms of generic years from the start of closure. The appendix is associated with the cost for closure. The (CFDP) elaborates on the high-level schedule by stating that decontamination was expected to be complete in a short period (e.g., 30 days) with dismantlement of the process equipment completed within 4 months after decontamination. The order of activities is detailed in the text.

The (CFDP) states that the plan will be reviewed and updated as required during the annual asset retirement obligation (ARO) cost review to address changes in facilities or development of new decommissioning technologies. The costs associated with the cyanide decommissioning plan are updated for inflation on an annual basis for inclusion into the ARO. The cyanide decommissioning costs were last updated in 2022.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 5.2.

Summarize the basis for this Finding/Deficiencies Identified:

Detailed worksheets for the reclamation costs are included as Appendix K of the *Closure Plan*. The costs were estimated using the SRCE model. The estimated cost for decommissioning and decontamination of the cyanide facilities is included in the (CFDP). Since 2012 this cost has been adjusted by an inflation factor of 1.5% each year and the revised total cost is presented in Table 1 of the Plan for each year since.

As part of Newmont's Asset Retirement Obligation (ARO) Policy, the financial accounting procedures require that mine closure liabilities be externally re-evaluated every year and Newmont internally review the closure plan every year. In line with this policy MWM's cost estimate for mine closure is reviewed and updated annually. Also, in line with ICMC requirements, the (CFDP) states that the assurance estimate is updated at least every five years or when revisions are made that affect cyanide-related decommissioning activities. The financial assurance for mine closure was last updated in 2019.

As a requirement of the Environmental Protection Act, RSO 1990, c E.19, MWM must provide financial assurance to the Crown in Right of Ontario to cover the estimated costs for mine

closure as a requirement of the Environmental Compliance Approval. To fulfill this MWM has established an irrevocable standby letter of credit accepted by the Ontario Ministry of Northern Development and Mines as a financial mechanism for mine decommissioning and closure. The letter of credit was submitted as part of the 2019 closure plan amendment.

6. WORKER SAFETY Protect workers' health and safety from exposure to cyanide.

Standards 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
- in substantial compliance
- not in compliance…with Standard of Practice 6.1.

Summarize the basis for this Finding/Deficiencies Identified:

MWM developed procedures to manage cyanide-related tasks during unloading, mixing, plant operations, decontamination prior to maintenance or confined space entry to minimize exposure. *Non-Routine Hazardous Tasks* and *Risk Assessment Procedures* are also implemented at the mine site. Moreover, Standard Instrumentation Procedures are in effect at the mill. The format of mill procedures includes a section dedicated to the description of the required PPE. When necessary, a reference to specific tools and or permits are confirmed in the procedures. The pre-work inspection process is embodied in MWM "Five Point Safety System". MWM established various measures to solicit worker input when developing or reviewing health and safety procedures especially those pertaining to cyanide management. The Cyanide Code Steering Committee (CCSC) composed of both workers and management representing maintenance, mill, emergency response, human resources, supply chain and sustainability departments is one mechanism designed to address cyanide related activities. In addition to the CCSC, MWM has an active Joint Health and Safety Committee (JHSC) for surface activities.

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
- in substantial compliance
- not in compliance…with Standard of Practice 6.2.

Summarize the basis for this Finding/Deficiencies Identified:

MWM controls the pH of the cyanide solution at the mixing and throughout the processing stages to limit the production of hydrogen cyanide. The control of pH is automated through a dosing system using caustic solution with a concentration that varies seasonally. The *Procedure for Mixing Sodium Cyanide* requires that the operator must verify pH is at or above 11.5 in the cyanide mixing tank. If the pH is below 11.5, the operator is required to add caustic. Otherwise, pH is set at 10.8 throughout the leach and CIP process and monitored with probes at the thickener, leach tank system, and acid wash tank. The pH data is relayed to HMI screens located in the control room and in the mill. The automated system has set alarms for low pH. The pH readings are recorded in the HMI system.

MWM identified areas and activities in the mill that could result in worker exposure to cyanide gas and dust. Accordingly, MWM installed nine (9) Dräger fixed HCN gas monitors to limit worker, contractor, or visitor exposure. The HCN monitors are located in different areas of the mill including at the cyanide mixing tank; reagent operator workstation; Acacia room; leach tank gallery; top of CIP tank # 1; above CIP safety screen; counter current decantation-CCD #2 overflow tank; and tailings thickener building (2 units). The *Personal Protective Equipment* standard and *Procedure for Mixing Sodium Cyanide* specify the use of appropriate personal protective equipment in the mill and, as an example, for a specific activity where exposure to cyanide gas or dust is likely. The HCN fixed monitors have a critical alarm set at 2 ppm for process investigation and a mill evacuation alarm at 4.7 ppm HCN. The HCN alarms are audible and visual to warn operators. The alarms are displayed on HMI screens located in the control room as well as in different areas inside the mill. The fixed HCN monitors are inspected and calibrated monthly through a preventive maintenance work order system. Mill operators also use portable Dräger HCN monitors which are calibrated and bump tested monthly.

MWM posted cyanide warning signage on all mill entrance doors and mill building doors. Cyanide warning signs have also been placed at entrance of warehouse. Similarly, cyanide specific signage is also present inside the mill including the cyanide mixing area. MWM purchases solid sodium cyanide briquettes from Draslovka. The cyanide briquettes are transported in 1 tonne Eco-Paks that contain the red dye as well as some caustic, also in solid form. MWM installed 14 emergency showers at strategic locations in the mill building and assay laboratory. Emergency shower stations include integrated eye wash equipment. The emergency showers are supplied with a distinct water supply line which is heated. All emergency showers are connected to the control room HMI system. The emergency showers are inspected weekly through the PM system and WO process. Only dry chemical portable fire extinguishers are present in the mill. Inspection tags of portable fire extinguishers indicate monthly inspections are conducted. No CO_2-based fire extinguishers were observed during the mill visit or in the warehouse where cyanide is present. MWM has established a *Pipe Label Standard*. The standard prescribes that all piping containing cyanide should be in purple colour and indicate flow direction. The mill cyanide process tanks also had appropriate identification labels. MWM maintains Safety Data Sheets (SDS) of hazardous products including sodium

cyanide on its server. The SDS are accessible from any HMI computer in the mill and other buildings. MWM also posted hard copies of sodium cyanide SDS in several mill areas as well as the cyanide warehouse where the reagent cyanide is present. MWM implemented an *Incident / Accident Investigation Guideline* and refers to a corporate Risk Management System (RMS) Consequence & Likelihood Table to manage an investigation process following any accident, incident, near miss, illnesses, hazardous condition, and property damage. The investigation process includes any cyanide release or worker exposure.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 6.3.

Summarize the basis for this Finding/Deficiencies Identified:

MWM has made available "CAREvent" duffle bags in the mill control room, assay laboratory, mine ambulance, mine health clinic, and security office. A "CAREvent" bag typically contains an oxygen cylinder with regulator, mask and tubing, pocket mask, and first aid equipment. The health clinic and ambulance are also equipped with oxygen cylinders and pocket masks for oxygen therapy. A stock of Cyanokits (5 g hydroxocobalamin) is maintained at the health clinic and in the ambulance. The Cyanokits are stored in their lyophilized form under room temperature in the clinic and ambulance (parked in a heated garage) at between 15 or 30 degrees Celsius as directed by the manufacturer. The administration of a Cyanokit is governed by a medical protocol which may involve, if time allows, the authorization by a mine medical director. Mill operators are equipped with two-way radios and can communicate with mill supervisor at any time. The health clinic staff inspects "CAREvent" duffle bags and the Cyanokits in the ambulance and mill control room (kitchen area) quarterly and records the inspection process on hard copies. MWM is using a cyanide exposure document developed by Occupational & Emergency Medicine Solutions Inc. (OEMS) to respond to a worker exposed to cyanide. The *Physician Assistant Medical Directives: Cyanide Exposure* document accounts for the different types of response to cyanide exposure, namely ingestion, inhalation and skin absorption in the Immediate Action Plan section (page 3).

MWM's onsite health clinic is also equipped with Automated Emergency Defibrillator (AED), and other first aid equipment such as vital sign monitors and a well-supplied pharmacy. The health clinic is staffed 24/7 with a minimum of two professionals, either a nurse or Physician Assistant. The medical staff can deploy to the mill building if instructed to do so by the Control Group to attend to an exposed worker. The distance between the health clinic and the mill is about 200 yards and takes less than 5 minutes to reach. On the advice of the medical director or depending on the criticality of the emergency, MWM has an agreement with ORNGE Air Ambulance Service for a medical evacuation to the Thunder Bay Regional Health Sciences

Center (TBRHSC). MWM medical staff would prepare a transfer patient and provide additional Cyanokits for the air medical evacuation. MWM renews annually its memorandum of understanding with the TBRHSC regarding the potential treatment of a cyanide exposed worker from the mine.

7. EMERGENCY RESPONSE **Protect communities and the environment through the development of emergency response strategies and capabilities.**

Standards of Practice

7.1 Prepare detailed emergency response plans for potential cyanide releases.

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 7.1.

Summarize the basis for this Finding/Deficiencies Identified:

MWM developed and updated several documents describing emergency preparedness and response aligned with its operations. These are a *Spill Prevention, Contingency, and Reporting Plan* (*SPCRP*); *Emergency Preparedness Plan Surface Emergency*; *MWM Emergency Response Team Guidebook*; *Sodium Cyanide Environmental Emergency Plan* (*Cyanide E2 Plan*); *MWM Tailings Storage Facility, Water Storage Facilities Emergency Response Plan*; and *Musselwhite Tailings Storage Facility Operations, Maintenance and Surveillance Manual (OMS)*. The emergency response documents complement each other to address several emergency response scenarios including potential cyanide related events.

The *Cyanide E2 Plan* present the response measures in place to address a catastrophic HCN release from different areas of the mill building; the response measures to address transportation accidents occurring on site or near the mine; the response measures to address a liquid or solid spill from mixing operations; utility power outage, the cyanide destruction reactor failure, and a fire close to a cyanide storage location. Both *Cyanide E2 Plan* and *SPCRP* addresses a pipe, valve, or tank rupture scenario while the emergency response and control measures in the event of a pond or impoundment overtopping, uncontrolled seepage or dam failure are discussed in the *Tailings Storage Facility and Water Storage Facility Emergency Response Plan.*

ICMC certified carrier "*Empire Express, Inc.*" is responsible for transport of solid form sodium cyanide from the manufacturing site to the designated transfer area at MWM. Once the tractor-trailer is parked, a MWM operator implements the *Unloading Sodium Cyanide from a Transport Truck* procedure and removes the Eco-Paks for transfer to the designated cyanide storage pad in the warehouse. The distance between the transfer platform and the storage

location in the warehouse is about 100 m. The delivery of cyanide to MWM occurs between May and October each year according to the bill of lading. Interviews with warehouse personnel also suggest this period of cyanide delivery is selected to avoid inclement weather on the isolated road between Thunder Bay and the mine; distance of over 700 km (420 miles). MWM is ready to assist *Empire Express* truck drivers within 100 km of the mine as there are no emergency services past the nearest community of Pickle Lake.

Specific response actions such as clearing site personnel and potentially affected communities are described in the *Cyanide E2 Plan* and the *MWM Tailings Storage Facility, Water Storage Facilities Emergency Response Plan's* section on Notification and Communication. The use of cyanide antidotes, first aid measures for cyanide exposure as well as spill containment, assessment, mitigation, and future prevention of releases is discussed in the *Cyanide E2 Plan*. The control of releases at the source is explicitly mentioned in the Spill or Leak section of *Cyanide E2 Plan.*

7.2 Involve site personnel and stakeholders in the planning process.

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 7.2.

Summarize the basis for this Finding/Deficiencies Identified:

MWM emergency response planning process and updated documentation involved internal resources according to interviews and names listed in the revision section of the Emergency Response Plan (ERP) documents. The documents present many site references which renders the emergency scenarios and responses aligned with observed operations. MWM is located in northwestern Ontario province, over 700 km from the City of Thunder Bay. The closest external emergency response capacity is Pickle Lake fire department, a 3.5-hour drive on a gravel road. Except for the availability of the medical director and Air ORNGE medical evacuation service, no external emergency response organization is identified in the MWM emergency response planning to provide support in case of an emergency. MWM communicates regularly with local Oji-Cree First Nations communities on cyanide management matters, tailings storage facility operations, emergency preparedness, and water management planning potentially affecting traditional land use like fishing and trapping. The SPCRP lists First Nation community representatives contacts. In June 2023, a stakeholder communication tabletop exercise was performed to comply with a Rapid Response initiative promoted by a government agency (emqnet online crisis real-time management technology).

MWM established an Environmental Working Committee (EWC) prior to the beginning of mining activities over 20 years ago. The EWC serves as the official communication channel between MWM and local communities. Meetings are organized regularly to present mining

activities and associated risks. The meeting minutes between 2021 and 2023 were reviewed and confirm the communication of mining program and risks. For example, a July 2023 EWC meeting presentation informed chiefs of local First Nations communities have a key role in the sharing of information to community members during an emergency at MWM. The shared MWM and First Nations chiefs' responsibilities are triggered by Ontario government program on Rapid Response.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 7.3.

Summarize the basis for this Finding/Deficiencies Identified:

The *SPCRP* specifies that the Mine General Manager's responsibilities include putting into action a team of trained personnel and equipment at the accident scene. The *Tailings Storage Facility and Water Storage Facility Emergency Response Plan* also confirms that, as the "mine site owner", the Mine General Manager's responsibilities include designating an ERP Coordinator and a Deputy Emergence Response (ER) Coordinator. The coordinators are responsible for understanding and implementing the ERP. The *Emergency Preparedness Plan Surface General* also explicitly mentions that the mine general manager's responsibilities include the authority to authorize the expenditure of resources and monetary funds necessary for the preservation of personnel and property. MWM's emergency response capacity is structured around a "Control Group" composed of the General Mine Manager, and other managers and coordinators representing all mine departments. The Control Group is led by a Control Officer. The Control Group is supported by the ERT (Emergency Response Team) and its Incident Commander. The *Emergency Preparedness Plan Surface General* and *MWM Emergency Response Team Guidebook* describe the Control Officer's and the ERT's structure, roles, responsibilities, and tasks to undertake during an emergency scenario. As indicated in the *Guidebook,* the ERT is led by an Incident commander assisted by experienced firefighters, entry team, Safety Officer and scribe to record events. The ERT personnel follow a training scheduled designed by the ER Coordinator. The training is a combination of third-party training and repeated simulated events practices. Training provided to ERT personnel consists of both theoretical and practical components regarding the hazards from chemicals including cyanide and the use of response equipment. MWM's emergency call out procedure is detailed in the *MWM Emergency Response Team Guidebook*. Upon receiving an event report by mine personnel, the security officer will notify the Control Group and the ERT personnel. Both Groups are notified by pager or dedicated application on iPhone.

Responsibilities for coordinators are described in the *Tailings Storage Facility and Water Storage Facility Emergency Response Plan* as well as in the *SPCRP,* and the *Emergency Preparedness Plan Surface General*. The available emergency response equipment (heavy machinery) and materials are identified in the *E2 Plan*. Other references to response equipment are in Appendix H of the *Tailings Storage Facility and Water Storage Facility Emergency Response Plan* and the *SPCRP*. MWM's emergency response equipment in the emergency response room and garage at the administration building's 1st floor is inspected through the work order system for the mobile equipment (ambulance, fire truck, etc.) and through the ERT's own inspection process for specific equipment like personal gas monitors and oxygen cylinders. There is no external entity with direct role and responsibility in the emergency response plan. The medical director, the air medical evacuation service and the TBRHSC are not directly involved in field emergency response at the mine or mock drills.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 7.4.

Summarize the basis for this Finding/Deficiencies Identified:

Several ERP documents list contact information for the notification of management, regulatory agencies, and medical facilities in case of cyanide exposure or release. The main notification reference is found in the *Tailings Storage Facility and Water Storage Facility Emergency Response Plan.* It contains a notification flowchart (appendix E) which provides a rational for the decision-making process towards informing external agencies while appendix I details the emergency notification to management, regulators and affected communities according to three (3) levels: unusual event - slowly developing; potential dam failure situation - rapidly developing; and urgent event imminent dam failure.

In addition to the main evidence for this question, the *Cyanide E2 Plan* document requires MWM to contact the federal agency. Similarly, the section on *Notification and Alarms* of the *SPCRP* document provides a detailed account of the government agencies to be contact in case of a cyanide spill or any other reportable spill. Appendix C of *SPCRP* refers to an *Event Reporting and Investigation Procedure*. The procedure describes extensively the reporting process to stakeholders including Newmont management and local communities. Moreover, MWM integrated the Newmont's *Rapid Response Plan* (*RRP*) framework. The *RRP* system is designed to bridge MWM and corporate response team and executive leadership to minimize impacts from an emergency scenario. The framework ensures communications are carried out in accordance with legal and ethical requirements and identifies actions to be taken on a broader scale than can be envisaged by those involved in overcoming the immediate hazards.

TBRHSC is contacted regularly by the MWM medical clinic staff to verify ability to treat cyanide exposed patient. Local communities potentially affected by a cyanide related incident are notified as per the original impact benefit agreement conditions. The notification coordinates of seven (7) local communities are listed in the *Tailings Storage Facility and Water Storage Facility Emergency Response Plan*. The *SPCRP* document confirms the need for MWM to notify ICMI in the event of a cyanide related spill or release event. The details regarding ICMI notification is observed in Appendix C, entitled *ICMI Cyanide Code Incident Notification*. According to interview and document review, no ICMI defined reportable cyanide spill has occurred at MWM during the recertification period.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 7.5.

Summarize the basis for this Finding/Deficiencies Identified:

MWM receives sodium cyanide briquettes in Eco-Paks which are stored in a reagent building prior to usage in the mill building. The *SPCRP and the E2P* provides cyanide spill response descriptions. The response guidance includes but is not limited to keeping material and spill area dry, if possible, shovel and sweep up spilled material into covered containers or plastic bags and hold for disposal and prevent run-off from spill enter waterway. The lime recommended for neutralization is stored in silos outside the mill building (in pebble lime and in pulverized lime). A lime solution is to be added to the spilled area if it is raining or the ground is moist. No other neutralization chemical is maintained at the site.

The decontamination of soil impacted by a cyanide spill or release is detailed in the *Cyanide E2 Plan*. The decontamination description is further supported by the reference to *MWM Contaminated Soil Sampling Procedure* and *NEM-MWM-STN-210 - Decontamination and Maintenance of the Cyanide System R5*. The latter procedure is oriented toward the decontamination of equipment used in the containment and recovery of a cyanide release. The *Cyanide E2 Plan* states the desired endpoint after clean-up of all cyanide spills that would have reach a ditch or water body are 0.4 mg/L Total Cyanide and 0.2 mg/L WAD Cyanide. The final maximum concentration of Free and Total Cyanide in soil is aligned with the federal agency (Environment Canada) requirement of 2 mg/kg.

The management and disposal of spill clean-up debris is documented in the *SPCRP* Section 3.9 on Risk Management and Chemicals Used in the Mill subsection where disposal guidance is

provided. The suggested disposal practices include adding the collected waste to the tailings box, if not upsetting the system or disposing into the tailings impoundment. The SPCRP also suggests to slowly introduce the collected waste in the leach gallery, the cyanide destruction system and the mixing tanks avoiding any rock and debris and considering the possibility of generating high concentration of HCN gas

The alternate drinking water supply requirement is detailed in the *Cyanide E2 Plan* "Potable Water" section. MWM indicated it keeps a two-day supply of bottled water on site. MWM anticipates that two days would be sufficient to get additional drinking water to the site. The *Cyanide E2 Plan* strictly prohibits the use of sodium hypochlorite, ferrous sulphate, or hydrogen peroxide.

MWM's environmental monitoring program following a cyanide spill or release is detailed in the *Cyanide E2 Plan* "Cyanide Sampling Plan" section. Specific guidance is provided for sample requirements along Mine Access Road, for the Mill Area and Reagent Facility, and for the Tailings Management Area. The document suggests sampling locations, methodology and other useful information for the sampler such as awareness or collection of wildlife mortality and need to undertake full visual inspection at sampling area.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 7.6.

Summarize the basis for this Finding/Deficiencies Identified:

The MWM emergency response documentation is largely driven by legal obligations and risk management practices. The *SPCRP* was updated in January 2024. General coordinates updates, compliance to local regulation and risk matrix review marked the last three years of updates. The *Cyanide E2 Plan* is an example of a legal obligation for MWM, and the document must be updated annually and submitted to the federal agency. *Tailings Storage Facility and Water Storage Facility Emergency Response Plan* was last updated in May 2023. Previous reviews included corporate review and comments. The *OMS Manual* has been updated 16 times since 1997. The last update was completed in August 2022. The MWM *Emergency Response Team Guidebook* was last updated in February 2024.

MWM conducted mock drills in 2021, 2023 and 2024. The 2022 cyanide related mock drill was missed due to Covid-19 outbreak and production recovery at the mine. An 18th December 2021 mock drill involved a mill operator exposure to cyanide near the mixing tank. The 8 May

2023 mock drill involved an operator reported missing after crash shower activation. A 27th January 2024 mock drill was conducted in the "reagent building" (warehouse). The scenario involved a cyanide Eco-Pak punctured by a forklift and potentially exposed operator. The mock drill is well documented and emphasized decontamination of potentially exposed operator as well as area. The Enablon software tracked four (4) completed corrective measures following the 2023 mock drill post-mortem. Six (6) recommendations followed the January 2024 mock drill. Lessons learned from cyanide mock drills are recorded in Enablon software for tracking and emergency response improvement purposes.

MWM reviews ERP documentation at least annually or after any cyanide-related event. The *Cyanide E2 Plan* is legally required to be reviewed annually. No cyanide-related event such as a spill outside containment area or exposed worker occurred during the recertification period.

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

Standards of Practice

8.1 Train workers to understand the hazards associated with cyanide use.

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 8.1.

Summarize the basis for this Finding/Deficiencies Identified:

MWM training department developed a cyanide awareness training module. The training is required for all personnel who may encounter cyanide. This includes but not limited to personnel at the mill; assay laboratory; maintenance; janitorial; nurse; human resources; safety; security; emergency response team; instrumentation; surface equipment operators; warehouse; environment department; visitors; and contractors. The awareness training is considered comprehensive with information on product; chemical reaction; personal safety and hazard recognition; first aid; Cyanokit; cyanide emergency plan; PPE, shipping information; gas detection; spill reporting; initial response activation; and MWM phone and radio contact coordinates for emergency response. Additional cyanide hazard recognition training is conducted for mill operators likely to encounter the reagent during their work activities. MWM requires cyanide awareness refresher training on an annual basis. The refresher training consists of the same original cyanide awareness training material. MWM keeps training records in hard copies in training department file cabinets. The most recent hard copy training records are for 2019. Otherwise, post 2019 training records (sign in sheets and quiz results) including "cyanide awareness" are accessible from CORE, a Newmont wide IT platform.

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
- in substantial compliance
- not in compliance…with Standard of Practice 8.2.

Summarize the basis for this Finding/Deficiencies Identified:

MWM mill operator competency training is structured under four (4) technical areas representing the metallurgy process. These are the Crushing; Grinding; Leach – CIP – Strip; and CCD - Reagents circuits. Each technical areas have its own training standard developed by MWM and associated training progression flow chart. The training standard consists of classroom and practical sessions to address safety guidance and operational proficiency. The safety guidance refers to PPE, workplace inspection, necessary permits, emergency shower, cyanide poisoning, reagent safety review from safety data sheet, and gas monitoring. The operational proficiency is gained from the review of all procedures designed to safely operate the circuit's equipment. In the individualized mill operator training package, each procedure is marked by trainer and trainee as completed once thoroughly reviewed. Similarly, the trainees go through formal examination and if successful a final sign off confirming proficiency and integration in the mill crew.

MWM relies on ten (10) trainers that have "Train the Trainer" qualification in addition to mill experience. According to interview, MWM has three (3) full-time trainers. The remainder of the training personnel are experienced mill operators and the Mill Team Lead. Full-time trainers provide Site Induction, Common Core training as per regulation and Mill Induction sessions. All employees are trained for their position and task prior to execution in the mill and warehouse where cyanide is present. The "Training Matrix" document identifies training requirements of various mine employees including mill, maintenance, warehouse, environmental, human resource, safety, security, and emergency response crew. Practical training and job observation during the final stage of training before sign-off on the training package is also part of competency acquisition at MWM. Refresher training on cyanide management occurs in different ways at MWM. As part of the Newmont Fatality Risk Management program, MWM implements Critical Control Verifications (CCV). CCVs are conducted by managers and coordinators (40/month) and supervisors (20/month) with the objective to assess the robustness of measures designed to ensure safe production. The results of each CCV are recorded on an information technology (IT) platform through iPhone application.

MWM evaluates the effectiveness of cyanide training through short quiz for "Cyanide Awareness" training or refresher training. In the case of mill operations circuit training, a more detailed examination approach is followed. This consists of a written test after initial classroom and practical sessions. After the initial classroom and practical session and corresponding test, trainees are left operating the circuit under direct supervision by the senior operator and spend 50% of their time with the available metallurgist. This mill training period is followed by a two-day task observation by the trainer, oral competency assessment on the floor for the whole circuit, and a second written examination. Training records of individual employees have been retained as hard copy in filing cabinet in the Training Department. The most recent hard copy records date back to 2019. Since 2019, training records have been saved electronically. At the time of the audit, training records were observed in Newmont's CORE Application. The records show employees' name; trainer's name; training date and topics covered. The quiz or examination results are also observed in the retained training records.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 8.3.

Summarize the basis for this Finding/Deficiencies Identified:

MWM developed several procedures in the event of an accidental release or spill of cyanide. The surface mine operators received training pertaining to recognizing HCN exposure limits and the implementation of *Procedure for Mill Shutdown Operating State* as well as *Procedure for Cyanide Reactor Shutdown*. In addition to the above, all mill operators have been trained in *Procedures for Mill Emergency Response* and *Critical Steps for HCN Mill Evacuation Event*. The critical steps aim at determining under which circumstances mill or ERT crew will intervene during a cyanide release.

The *Updated Cyanide Code Training Matrix* file also confirms mill and maintenance crew being trained on *Procedure for Treating Cyanide Exposure* and *Decontamination and Maintenance of the Cyanide System.* The mill operators receive oxygen therapy (CAREvent) training annually along with AED and cardiopulmonary resuscitation (CPR) training. The first aid and worker decontamination measures are also presented in the "*Cyanide Awareness*" training material reviewed by all employees annually. The *mill circuit training package standards* all have a reference to mill emergency response procedure and first aid treatment. As such, mill operators have received training on measures to follow during a cyanide release.

MWM is required by regulation to train its ERT members a minimum number of hours annually (6 sessions of 8 hours). The ERT training schedule for 2023 included the following: Treating Cyanide Exposure; Hazmat; Self-Contained Breathing Apparatus; Advanced First Aid; Cyanide Awareness; Confined Space Rescue; and Standard for Industrial Fire Brigade Member Professional Qualifications (National Fire Prevention Act (NFPA) Code 1081). Equipment-based training includes fire truck, ambulance, rope rescue, lifting bags and battery powered extrication tools. There are no external responders with direct role and responsibility in a mine-based cyanide emergency scenario. The MWM training program includes annual refresher training on oxygen therapy; AED and CPR; and Cyanide Awareness. Use of emergency showers, initiation of mill evacuation alarm and spill response are discussed in "*Cyanide Awareness*" annual refresher training. MWM ERT conducts a mock drill annually to verify readiness under different response scenarios. MWM retains training records of individual employees including emergency response team members (33 members) in hard copy in filing cabinet in the Training Department. The most recent hard copy records date back to 2019. After 2019, training records have been saved electronically. At the time of the audit, training records were observed in Newmont's CORE Application. The records show employees' name; trainer's name; training date and topics covered.

***9. DIALOGUE* Engage in public consultation and disclosure**.

Standards of Practice

9.1 Provide stakeholders the opportunity to communicate issues of concern.

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 9.1.

Summarize the basis for this Finding/Deficiencies Identified:

MWM has a long-standing relationship with the First Nation communities living in the vicinity of the mine. The local communities include those of North Caribou Lake, Cat Lake, Kingfisher Lake, Wunnumin Lake, Shibogama First Nations Council and Windigo First Nations Council. The original "Musselwhite Agreement (Impact Benefit Agreement - IBA)" was signed in 1996 and renewed regularly since that date. The agreement established two distinct committees: an "Environmental Working Committee (EWC) and a Musselwhite Working Committee (MWC). The EWC is the main channel for MWM to provide stakeholders with information on its mine activities and cyanide management practices. The MWC is dedicated to the monitoring of socio-economic matters. The Mishkeegogamang First Nation has distinct impact benefit agreement with MWM but based on similar arrangements. Each committee includes community representatives. The EWC members (total of 12) meet at least four (4) times a

year as per the IBA agreement. The meetings are held either in Thunder Bay or at the mine site. In addition, the EWC members meet at the mine twice a year (May or June and October or November) to celebrate the opening and closure of the water management activities associated with final effluent discharge into the natural receptor. The ceremonies coincide with general mine site tours.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 9.2.

Summarize the basis for this Finding/Deficiencies Identified:

MWM developed a one-page leaflet "Cyanide Awareness at Musselwhite Mine". The document presents in non-technical terms what is cyanide, how it is used in mining, safety and environmental protection measures associated with its presence and usage, as well as compliance and oversight regarding the reagent. The leaflet provides a phone number and email address of MWM Environment Department for inquiries. The document is illustrated with photos of cyanide pellets, stacked cyanide Eco-Paks, reagent building, cyanide mixing area, aerial view of the TSF and wetland treatment pond. ICMI is referenced in the leaflet. The document is in English language and considered appropriate for the local community audience.

According to interview, community members serving on the EWC committee communicate easily in English and the literacy rate among the community is considered high. When special events occur in local communities (e.g., helicopter bringing mine representative for environmental sampling campaigns), resulting discussion about mine activities and cyanide management is shared in Oji-Cree language for elders if necessary. In addition, EWC meeting presentations are supported by photos, and illustrations when appropriate. The MWM Sustainability and External Relations (S&ER) manager has been involved as a mine representative to the community for the past 22 years. His contact information (email or phone number) is used by EWC members or stakeholders when concerns arise about mine activities or cyanide management.

The Ontario Ministry of Labour requires that any hospitalization or fatality be reported immediately upon occurrence. Similarly, hospitalization must be reported to EWC according to IBA agreement. No cyanide release occurred outside the mine perimeter during the recertification period. A cyanide exposure incident reportable to an Ontario government agency is considered accessible to the public within the limitations of the Freedom of Information and Protection of Privacy Act. A 21 January 2023 spill event was recorded in the MWM register. The event refers to a spill of process water inside the tailings thickener

building located nearby the tailings storage facility (TSF). The January 2023 event did not result in adverse effects to health or the environment. The event was communicated to the EWC members and to Newmont corporate (COO) within 24 hours. The concentration of the spilled material was established at 2,9 mg/L WAD cyanide by external laboratory. The event did not require additional reporting. Finally, Newmont's 2023 Sustainability Report (Performance Data) provides public access to MWM's cyanide release and exposure event information.