International Cyanide Management Code Mining Operation Recertification Audit

Summary Audit Report

Report Prepared for

Marigold Mine

Marigold Mining Company
(An SSR Mining Inc. Company)
PO Box 160
Valmy, Nevada 89438

Report Prepared by

Mountain Valley Professionals, LLC

MVP Project NO. P-MMC2024.77

December 26, 2024

Marigold Mine

International Cyanide Management Code

Recertification Summary Audit Report

Marigold Mining Company

(An SSR Mining Inc. Company)

PO Box 160

Valmy, Nevada 89438

Mountain Valley Professionals
59 Damonte Ranch Parkway,
Suite B, # 298
Reno, Nevada 89521

e-mail: john.barber@mvp-nv.com
website: www.mvp-nv.com

Tel: (775) 636-5999

MVP Project # P-MMC2024.77

December 26, 2024

Table of Contents

Operational Contact

Mine Operations:	Marigold Mine
Mine Owner:	SSR Mining Inc.
Name of Operator:	Marigold Mining Company
Name of Responsible Manager:	Anton Kruger
Address and Contact Information:	Marigold Mining Company PO Box 160 Valmy, Nevada 89438
Email Contact	Anton.kruger@ssrmining.com
Telephone Contact	775-502-4800

Location and Description of the Operation

Marigold Mining Company (Marigold), an SSR Mining, Inc. (SSR) company, currently operates The Marigold Mine, an open-pit, heap leach operation utilizing an adsorption, desorption, and recovery (ADR) process. The mine is located approximately three miles south of Valmy in the southeastern portion of Humboldt County, Nevada (**Figure 1**). In 2014, SSR acquired the Marigold joint venture from Goldcorp Inc. and Barrick Gold Corporation (Barrick). On August 1, 2017, SSR announced that they would officially become known as SSR Mining Inc., after more than 70 years in business as "Silver Standard Resources Inc.".

The mining operation consists of multiple open pits and precious metal processing facilities encompassing approximately 41.3 square miles (25,889 acres) of private and public land.

This acreage includes the August 2015 purchase of 6,720 acres of public and private land previously held by Newmont Mining Corporation – Valmy Project. In June 2016, Marigold received authorization from the Nevada Department of Environmental Protection (NDEP) to increase the stacking rate from 25 million (M) tons of ore annually to 40 M tons utilizing conventional cyanidation technology. Run-of-mine ore is hauled from the open pits to the heap leach pad.

Presently, crushing operations are only conducted for producing gravel overliner material for heap leach pad construction, aggregate for road maintenance, and construction, stemming material for blasting operations.

The facility is designed, constructed, and operated to prevent release or discharge of process solution from the fluid management system except for exceptional meteorological events that exceed the design criteria for storm events.

The fluid management system for the heap leach facility consists of pregnant and barren solution ponds, a stormwater collection pond, ADR processing and chemical storage facilities, a lean solution recirculation system, a lined heap leach pad with multiple cells, and appurtenant structures. The liners for cells 1, 2, and 8 are a 24-inch compacted clay. These cells were built in 1989-1990, before the NDEP required synthetic liners. These cells have been retired and in draindown. All other cells have a synthetic liner system. The system is designed to contain stormwater flows and draindown from the heap leach cells during simultaneous 100-year, 24-hour storm and 24-hour power outage events. The former mill ceased operations in 1999 and has since been decommissioned and dismantled. With closure of the milling circuit, the existing 180-acre tailings storage facility (TSF) was taken out of service, reclaimed, and closed and will not be used for further deposition of tailings or impoundment of process solutions.

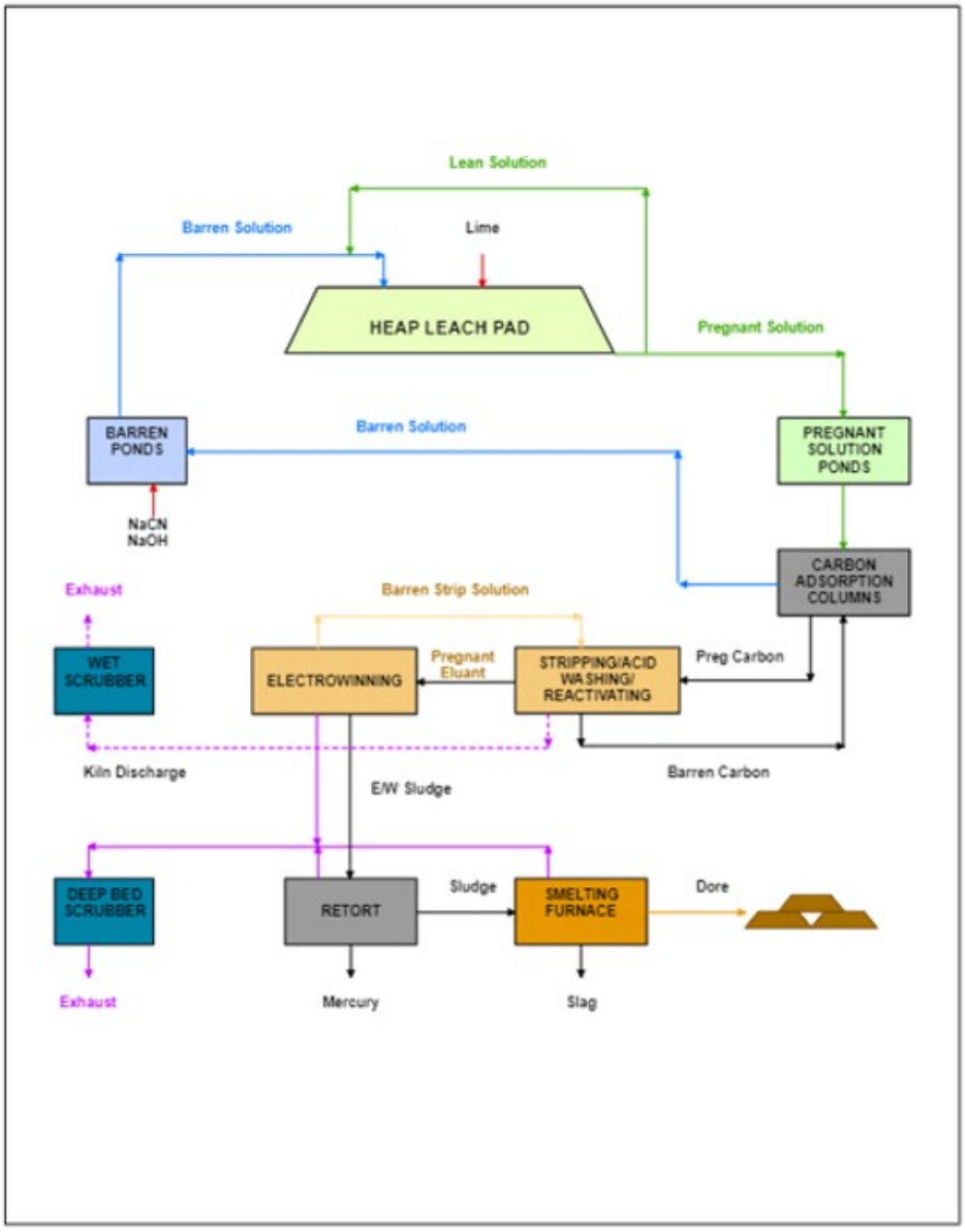
The leach pad currently consists of 28 cells, of which 17 cells are considered active. The leach pad cells were constructed in the following sequence: 1, 2, 8, 7, 6, 5a, 5b, 4, 3, 2/3 Infill, 9, 10, East Heap Leach Pad Extension, 11, 12, 14, 13, 15R, 16, 17, 18, 20, 21, 19, 22, 24, 19b, and 23a). Cell 23b was approved for construction during the timeframe of this audit, but not yet constructed, and the Engineering Design Report for Cell 23c is being prepared but not yet submitted for agency review.. was pending agency authorization. The heap leach cells are stacked with run-of-mine ore, which is trucked to one of the active heap leach cells and end-dumped in 15- to 50-foot lifts. Once a lift or portion of a lift is complete, the surface is cross ripped to an average depth of approximately nine feet to enhance solution percolation. Solution distribution lines are then placed on top of the ore, and barren solution is applied using either drip emitters or sprays at a rate of up to 20,000 gallons per minute (gpm).

The barren solution percolates through the ore collecting precious metals and exits the heap material at one of several collection areas as pregnant solution. The pregnant solution is conveyed, by gravity flow, to the pregnant solution pond or the recirculation system via High-density polyethylene (HDPE) pipelines located in synthetic lined ditches. Upon exiting the heap, the pregnant solution is routed to either the recirculation system or the pregnant solution pond depending upon the precious metal content of the solution. If the precious metal content is low, the solution (lean solution) is routed to the recirculation system to report to the top of the heap for extraction of additional precious metal. If the precious metal content is high enough, the pregnant solution is routed to the pregnant pond. At the time of the audit Marigold was in the process of decommissioning the recirculation system and going to single-pass solution operations.

Marigold currently operates seven carbon column trains in parallel. Solution reporting to the pregnant pond is pumped through carbon columns to recover the precious metal.

Upon exiting the carbon columns, the solution is barren and contains low levels of precious metal and flows by gravity to the barren solution pond. The barren solution is recirculated, using pumps, back to the top of the heap to continue the leaching process.

Figure 2 - Process Circuits



Carbon from the various carbon column trains is transferred to the Carbon Strip Circuit and processed to recover gold. Within the Carbon Strip Circuit, a hot alkaline solution (approximately 285° Fahrenheit with a pH of 13 or greater) under pressure is used to strip the precious metals from the loaded carbon. The solution eluate is then passed through an electrowinning circuit (located inside the Refinery within the Process Building) where the metals are electroplated.

The resultant gold-bearing material is retorted for drying and mercury removal prior to being placed in the crucible furnace located inside the Refinery, mixed with a flux, and smelted to produce doré. The stripped carbon is washed with acid and then reactivated by heating in a rotary kiln.

A schematic of the process circuit is illustrated in **Figure 2**.

There are a total of six pregnant solution ponds (Pregnant Ponds 1, 2, 3, 4, 5 and 6) and two barren solution ponds (Barren Ponds 1 and 2), interconnected with synthetic-lined channels, which cumulatively make up the pond system. The ponds are constructed with primary and secondary HDPE liners over a compacted clay base. A Leak Collection and Recovery System (LCRS) is installed between the primary liner and the secondary HDPE liner system designed to capture any solution before it reaches the compacted clay base of each pond and is designed to meet federal and state standards. During 2003, Pregnant Pond 1 was removed from service and remains inactive, but available for limited emergency situations. The maximum ore stacking rate remained at 40 million tons annually (MTA) since the 2018 audit cycle.

Liquid cyanide at 30% concentration is delivered at the Marigold site in tanker trucks at two locations: offload Site 1 and Site 3. Cyanide is stored at both locations in cyanide tanks before it is distributed for use in the production facilities.

Cyanide Facilities

The active cyanide facilities at the Marigold Mine, which comprise the existing fluid management system, consist of the following:

- Two Cyanide Offload/Storage Facilities (cyanide storage tanks and offload appurtenances);
- Heap Leach Pad (28 cells (Cells 1, 2, 3, 2/3 Infill, 4, 5a, 5b, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15R, East Side Extension, 16, 17, 18, 19, 20, 21, 22, 24, 19b and 23a). Cell 23b has been permitted but not yet constructed and 23c is pending permitting;
- Process Solution Ponds;
    - Barren Ponds 1 and 2 (double-lined);
    - Pregnant Ponds 1, 2, 3, 4, 5, and 6 (double-lined, Pregnant Pond 1 is decommissioned, maintained empty due to a leak in the primary liner and available for short periods of time in the event of an emergency);
- Stormwater Pond (single-lined);
- ADR circuit;
    - 35 Carbon Columns (seven column trains and appurtenances);
    - Carbon Strip Circuit (carbon transfer and holding tanks, strip and acid wash vessels, pregnant and barren solution tanks, and associated process tanks and appurtenances);
- Process solution piping and lined solution collection channels;

- LCRS for the heap leach cells and the solution ponds; and
- Associated concrete and lined secondary containment structures, process solution transfer pipes, valves, and pumps.
- New facilities constructed during this audit period were:
  - Cell 23a; and
  - Barren Pumping Feed Box.

Auditor Information

Marigold Mine	☒ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	**The International Cyanide Management Code**

The auditor has determined that the Marigold Mine is in **Full Compliance** for this International Cyanide Management Code audit.

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

Audit Company: *Mountain Valley Professionals, LLC*
59 Damonte Ranch Parkway, Suite B #298
Reno, Nevada 89521
www.mvp-nv.com

Audit Team Leader: John R. Barber
Lead Auditor & Mining Technical Auditor

Email: john.barber@mvp-nv.com

Audit Dates

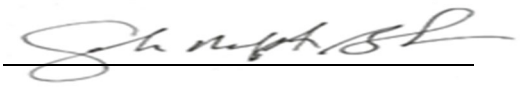
The site visit for the Recertification Audit was undertaken over 4 days from June 3rd – 6th, 2024.

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 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 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 Institute for Mining Operations Verification Protocol (2021) and using standard and accepted practices for health, safety, and environmental audits.

Date: December 26, 2024

Operation Name: **Marigold Mine**

Signature of Lead Auditor: 

PRINCIPLE 1 – PRODUCTION & PURCHASE

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

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 1.1**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with 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. Independent cyanide distributors were not used.

The Chemours Company (Chemours), now Draslovka Mining Solutions, was the cyanide producer and supplier for Marigold Mine until January 1, 2022. Marigold operated under a contract with Chemours dated January 1, 2016, the "First Amendment" dated January 2018, and the "Second Amendment" dated January 2019. During this time Chemours was signatory to the International Cyanide Management Code (ICMC) and the auditor reviewed the ICMC Summary Audit Report for the Chemours North American Sodium Cyanide Production and Packaging Operations, prepared by Management Solution Systems, Inc. (MSS) (November 15, 2019), demonstrating full compliance with the ICMC production protocol.

Effective January 1, 2022, Marigold's cyanide supplier was Cyanco Company LLC (Cyanco), who has been the sole provider since. Cyanide purchased from Cyanco originates from the Winnemucca, Nevada production facilities to the Marigold Mine. Over the period reviewed during this audit cycle, cyanide was produced and supplied from the Cyanco Winnemucca Production Plant located in Winnemucca, Nevada. The Cyanco plant produces liquid sodium cyanide.

The Cyanco Winnemucca production facility was initially certified fully compliant with the Code in October of 2006 and has maintained full certification, with the most recent certification date of January 13th, 2023.

PRINCIPLE 2 - TRANSPORTATION

Protect communities and the environment during cyanide transport.

Standard of Practice 2.1	**Require that cyanide is safely managed through the entire transportation and delivery 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 with**
- ☐ in substantial compliance with **Standard of Practice 2.1**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 2.1, requiring 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.

Marigold signed an agreement with Chemours on January 1, 2016, with subsequent amendments, for the supply and transportation (Quality Carriers) of liquid sodium cyanide to site. During this recertification audit period, cyanide was purchased exclusively from Chemours from December 2021 to January 2022. Quality Carriers has been the exclusive transporter of cyanide to the site under the referenced contract during this period.

Marigold signed an agreement with Cyanco on January 1st, 2022, for the supply and transportation (TransWood) of liquid sodium cyanide to site. During this recertification audit period, cyanide was purchased exclusively from Cyanco from January 2022 to June 2024. TransWood has been the exclusive transporter of cyanide to the site under the referenced contract during this period.

Quality Carriers has been found in full compliance with the ICMC since they were first certified in November 2006. The current Re-Certification was completed on March 14, 2023, and the transporter was found to be in full compliance to the ICMC.

TransWood has been found in full compliance with the ICMC since they were first certified in October 2006. The current Re-Certification was completed on November 27, 2022, and the transporter was found to be in full compliance to the ICMC.

PRINCIPLE 3 – HANDLING & STORAGE

Protect workers and the environment during cyanide handling and storage.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 3.1**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 3.1, requiring that cyanide handling and storage facilities are designed and constructed consistent with sound, accepted engineering practices, quality assurance/quality control (QA/QC) procedures, spill prevention, and spill containment measures.

No new facilities for unloading, storing and mixing cyanide were constructed at Marigold. The existing facilities were verified and accepted during the previous audit. However, Site 1 relocation to the New Reagent Storage Area was inspected and verified during the previous audit and was fully commissioned during this audit period. While Site 2 has been decommissioned, with the Site 2 cyanide storage tank rinsed and stored onsite. The Site 2 caustic tank was relocated to the New Reagent Storage Area (Site 1) as a cyanide storage tank.

The supplier, Cyanco, conducted a site survey of Site 1 prior to the first offload for the facility. The site survey concluded that Site 1 met Cyanco requirements for deliveries/offloads.

The cyanide offload/storage facilities at Site 1, and Site 3 are well situated with respect to surface and groundwater resources. No perennial or intermittent streams are within one-half mile of these facilities and no groundwater supply wells are nearby. Site 1 and Site 3 offload/storage facilities are located well away from the office facilities; therefore, the locations do not present any undue risk for human exposure.

The cyanide offload process is conducted on reinforced concrete pads at Site 1 and Site 3. At Site 1, the concrete containment drains via gravity to Barren Pond 2. At Site 3, the pad is within the lined area of intersection of Cell 3 and leach pad Cell 12.

Marigold has overfilling alarm and level indicators installed on the cyanide storage tanks located at both cyanide offload/storage areas. The instrumentation consists of tank level indicators with digital readouts that display a percentage full value, and high-level visual/audible alarms (strobe light and siren). Marigold tests the operation of the alarm systems and documents tank fill values prior to beginning an offload event and during every shift, when in use, for cyanide inventory control. Standard Operating Procedures (SOP) "Escorting and Monitoring the Offloading of Cyanide Deliveries" defines the high alarm settings and allowable (maximum) tank levels (percent full) for initiating offloads at Site 1 and Site 3. The instrumentation boxes at each offload area are labeled accordingly and were verified during the field portion of this audit.

No modifications have been made to the surfaces that the two-cyanide (Site 1 and Site 3) storage tanks have been located on since the previous ICMC audits.

The original Site 2 cyanide storage tank was rinsed and stored on site, while the Site 2 caustic tank was relocated to the New Reagent Storage Area, as a cyanide storage tank, which was subsequently renamed Site 1. The cyanide tank foundation at Site 1 is solid mass concrete (i.e., the concrete floor slab).

No modifications have been made to the Site 1 and Site 3 cyanide storage tanks' secondary containments materials since the previous ICMC audit. The secondary containment structures provided for the cyanide storage tanks at Marigold are constructed of concrete and/or HDPE liner. These materials provide a competent barrier to leakage. During the field component of this ICMC recertification audit, the auditor verified that the concrete containment was in good repair, with cracks in the concrete grouted and/or sealed.

Marigold uses only liquid cyanide stored within enclosed, insulated steel tanks.

The cyanide storage areas are located outside and are well ventilated with minimal potential for Hydrogen Cyanide (HCN) gas build-up.

The two cyanide storage areas are within the fenced mine property. Site 1 is within a second (high and well-posted) fence to prevent wildlife and other uncontrolled access to the cyanide storage tank, which is limited to authorized personnel. The cyanide tanks are filled from the top with piped conveyance and outflow, which prevents access (without dismantling the system). The cyanide storage tanks at both offload areas have secured valves to prevent unauthorized and inadvertent access. Marigold stores cyanide separately from incompatible materials. Acid storage is located near the process building away from cyanide; within discrete containment area.

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

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

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Practice 3.2 requiring that cyanide handling and storage facilities are operated using inspections, preventive maintenance, and contingency plans to prevent or contain releases and control and respond to worker exposures.

Marigold receives liquid sodium cyanide in liquid bulk tanker trailers that are returned to the vendor.

The operation has implemented procedures to prevent releases and exposures during cyanide unloading, transfer, and mixing. The procedures describe the steps for offloading liquid cyanide, including pre-offload preparation, inspections and post-delivery rinsing of the tanker. The operation of the valves are included in the procedures. The procedures are accompanied by checklists.

Maintenance of the delivery tanker, tanker valves and hose are the responsibility of the supplier, while maintenance of the storage tank and valves are included in the Marigold maintenance program.

The operation has also developed procedures to be followed in case of cyanide spillage during cyanide offloading and transfer activities, including the timely clean-up of cyanide spills. The procedures describe the required personal protective equipment (PPE) for offloading and full-time observing of offload events.

Addition of colorant dye is the responsibility of the manufacturer and is included in the manufacturers packaging during loading at the manufacturer's facility, no colorant dye addition occurs at the site.

PRINCIPLE 4 – OPERATIONS

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

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 4.1**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.1, requiring that the operation implement management and operating systems are designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures.

The active cyanide facilities at the Marigold Mine, which comprise the existing fluid management system, consist of the following:

- Two liquid sodium cyanide offload/storage facilities (cyanide storage tanks and offload appurtenances);
- Heap Leach Pad (28 cells (Cells 1, 2, 3, 2/3 Infill, 4, 5a, 5b, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15R, East Side Extension, 16, 17, 18, 19, 20, 21, 22, 24, 19b and 23a). Cell 23b has been permitted but not yet constructed and 23c is pending final design permitting;
- Process Solution Ponds;
- Barren Ponds 1 and 2 (double-lined);
- Pregnant Ponds 1, 2, 3, 4, 5, and 6 (Pregnant Pond 1 is double-lined, decommissioned, and maintained empty due to a leak in the primary liner. It is available for temporary use in the event of an emergency);
- Stormwater Pond (single-lined);
- ADR circuit;
- 35 Carbon Columns (seven column trains and appurtenances);
- Carbon Strip Circuit (carbon transfer and holding tanks, strip and acid wash vessels, pregnant and barren solution tanks, and associated process tanks and appurtenances);
- Process solution piping and lined solution collection channels;
- LCRS for the heap leach cells and the solution ponds; and
- Associated concrete and lined secondary containment structures, process solution transfer pipes, valves, and pumps.

Marigold currently implements SOPs and written procedures related to the operation of its cyanide facilities. These written procedural documents cover the Marigold cyanide facilities and provide measures for managing cyanide in a manner that prevents and/or controls releases to the environment and exposures to workers and the community. The SOPs identify the required PPE, outlines the risks involved with the operating tasks, and adequately describe safe work practices.

Additionally, the Water Pollution Control Permit (WPCP) and the WPCP Renewal Applications stipulate operating requirements for the process facilities.

The WPCP and the WPCP Applications identify the design/operating parameters and regulatory requirements on which the Marigold process facility (fluid management system) design is based.

The WPCP stipulates monitoring requirements, storage of process solution in ponds, the allowable solution application rate to the heap leach pad, action alert levels for the leak detection systems, inspection requirements, closure requirements, and facility designs. In accordance with the WPCP, Marigold must: 1) construct, operate, and close the facility per the approved application; 2) contain within the fluid management system all process fluids including all meteoric waters that enter the system as a result of the 25-year, 24-hour storm event; and 3) not release or discharge any process or non-process contaminants from the fluid management system.

According to the WPCP Application the fluid management system, which includes the process pond system, is designed to contain the normal operating volume of the ponds; precipitation from the 100-year, 24-hour storm event; and 24-hours of draindown from the heap, while providing additional volume based on two feet of freeboard. SOP "High Preg or Barren Pond Levels" (Updated June 2021) incorporates the pond design parameters into the operating procedure for maintaining the process ponds at the allowable operating levels. The SOP also provides procedures to follow during upset conditions.

Marigold operates as a zero-discharge facility. Cyanide concentrations of the process solutions applied to the heap leach pad and stored within the barren and pregnant solution ponds are generally above 50 milligrams per liter (mg/L) Weak Acid Dissociable (WAD). The target concentration of Free cyanide in the barren process solution is 0.45 pounds per ton (225 mg/L). Consequently, Marigold utilizes fences, netting, and bird balls to protect wildlife from open solution.

The plans and procedures address those aspects of the operation that are necessary for protection of workers, communities, and the environment. These procedures provide routine inspection and maintenance programs and address proper management of process solutions at the heap leach pad and process ponds to retain the design storage capacities.

Other inspections completed by Marigold include Area Inspections, Pre-Shift Environmental, Spills & Wildlife Inspections (Environmental Inspection Book), and Stormwater Inspections.

Marigold implemented a formal "Management of Change" procedure in March 2010. Prior to this procedure, Marigold discussed procedures and continual improvements in weekly safety meetings. In 2024, Marigold updated its Management of Change procedure to enhance the program and make the completion process more user friendly.

The Management of Change procedure is designed to cover all activities at the Marigold Mine including those involving contractors and vendors. Marigold uses the procedure to ensure that it evaluates changes for potential environmental, safety, and health risks and that it takes appropriate actions to ensure existing performance levels are not compromised. The program addresses the requirements for managing planned and unplanned or emergency changes.

SOP "High Preg and Barren Pond Levels" defines the safe operating levels of the process ponds and provides procedures to follow in response to varying degrees of upset conditions. Additionally, the WPCP Renewal Application includes emergency and spill contingency procedures for cyanide management in situations where there is an upset in the facility water balance, when monitoring or inspections identify problems, and when temporary closure or cessation of operations become necessary. Marigold inspects and documents the pond levels each shift to identify potential upset conditions.

In accordance with the WPCP, Marigold will notify the NDEP of planned temporary closures with an anticipated duration exceeding 30 days.

In addition, the NDEP will be notified within 30 days after an unplanned temporary closure. The notification will include a description of the procedures and controls that have been or will be carried out to maintain process components during the closure period. During temporary closure, maintenance and inspection of the facility will take place regularly to ensure protection of adequate storm storage capacity in the process ponds and to ensure that the integrity of pipelines, trenches, diversion structures, berms, and embankments is preserved. Marigold will continue to monitor the leak detection systems throughout the temporary closure period and ensure that the solution ponds can accommodate precipitation accumulation during the shutdown period. Prior to shut down, solution volumes in the ponds will be reduced to a minimum. Sufficient storage capacity within the ponds will always be maintained to contain the design 100-year, 24-hour storm event. If necessary to reduce the volume of solution in the ponds, the application of solution to the pad may resume (but with no addition of make-up water to the circuit). Irrigation of the heap will cease once solution volumes have been reduced to accommodate the design 100-year, 24-hour storm event.

In addition to the daily, monthly and quarterly visual inspections, contractors (CarWil) perform thickness testing and review, respectively, on the two cyanide storage tanks. Site inspections are designed to identify external corrosion, leaks and drips and overall condition of the tanks. CarWil provided the test measurements and tank integrity ("life") based on the measurements. Marigold provided documents with conclusions regarding the integrity of the tanks. The measurements supported that continued operation of these tanks within established parameters and safety procedures would protect against cyanide exposures and releases.

Marigold conducts monthly inspections of the secondary containment structures provided for the process tanks and pipelines during the daily (each shift) area inspections and during the monthly Cyanide Code Inspections. Any observed issues during inspections are documented on daily inspection forms and in monthly reports.

Leak detection systems are installed in the process ponds and Cell 7 of the leach pad. Process personnel inspect flow in these leak detection systems daily and document the results on two spreadsheets, "Daily Production Summary" report (Leak Detection tab) and "Daily Heap Leach Report." The Environmental Department receives a monthly report from the Process Metallurgy Lab with a summary of the results.

Marigold inspects pipelines, pumps, and valves for signs of deterioration and leakage during the daily (each shift) area inspections and during the monthly Cyanide Code Inspections. Any observed issues during inspections are documented on daily inspection forms and in monthly reports.

Process Lead Operators monitor process pond levels each shift and informally record results in a logbook prior to electronic formal entry into the Water Balance Model (spreadsheet) each day.

SOP "High Preg or Barren Pond Levels" incorporates the pond design parameters into the operating procedure for maintaining the process ponds at the allowable operating levels. The SOP also provides procedures to follow during upset conditions.

In accordance with its Storm Water Pollution Prevention Plan (December 2018), Marigold inspects its stormwater facilities, including surface water ditches and diversions, quarterly and following significant storm events.

Marigold process personnel perform comprehensive, monthly inspections of cyanide facilities according to SOP "Monthly Inspection (Cyanide)." These inspections cover the entire cyanide process circuit (fluid management system) and include photographs and a listing of all identified issues. The inspection report includes a summary table, which itemizes each issue and includes the completion date for each corrective action along with the name of the person that completed the work.

Facility components inspected include tanks, pipes, hoses, pumps, flanges, signs and labels, concrete integrity, presence of open solution and cyanide salt buildup, high level alarm systems on storage tanks, antidotes, liner systems, wildlife deterrent systems, wildlife activity and mortalities, and the onsite emergency generator. Work orders were generated and appropriate actions were taken to close these issues out.

The comprehensive monthly inspections are supplemented by daily work area inspections. Marigold inspects solution levels in the process ponds daily.

It is the auditors professional opinion that the site inspects cyanide facilities on a frequency that is sufficient to assure and document that they are functioning within design parameters.

The written inspection reports include the date of the inspection, the name of the person that conducted the inspection and any observed deficiencies and corrective actions taken. Inspection records were maintained between the 2021 ICMC audit and this recertification audit.

SOP "Process Facilities Preventative Maintenance" provides the procedure for conducting routine preventive maintenance on cyanide pumps. This SOP lists the maintenance activities and schedule for each pump type. Maintenance activities include checking packing, oil levels (daily), excessive vibration (daily), lubrication (automatic and weekly), and visual inspection (daily and monthly) for leaks and other problems that may cause spillage.

To achieve maximum value, the vertical turbine pond pumps are generally operated until the impellers either wear out or scale to the point that pumping volume is diminished. Removing the pump for preventive maintenance is not cost effective due to the rental cost of a crane. Therefore, Marigold keeps redundant pumps and parts available on site to facilitate quick repairs and/or pump replacements.

Marigold utilizes SAP, a computerized maintenance management software, to manage preventive and corrective maintenance. During this audit, the auditor reviewed maintenance records in the system for the cyanide facilities over the three-year period between the 2021 ICMC audit and this recertification audit, including those for the leach circuit and the Carbon Strip Circuit. Maintenance items requiring work orders identified on routine inspections were tracked through the system to verify completion.

The Marigold operation has one diesel-powered generator located at the Booster Pad station.

According to SOP "HL Gen Set," the generator capacity is 350 kilowatts (450 to 500 horsepower) and is capable of powering five pregnant solution pumps or three pregnant solution pumps and one barren solution pump. During line outages, Marigold allocates emergency power to process solution pumps as necessary. The Process Manager also indicated that, if necessary during prolonged outages, Marigold could rent additional generators from nearby towns or cities (i.e. Battle Mountain, Reno, or Winnemucca) and depending on availability, could arrive to the site within eight to 36 hours. The pond system is designed and managed to retain 24 hours of draindown from the heaps plus runoff generated by a 100-year, 24-hour storm event, while maintaining two feet of freeboard.

Marigold performs routine preventive maintenance on the generator, which includes checking for oil leaks, sampling the engine oil, checking fluid levels, cleaning the fuel screen, checking fuel and air filters, and ensuring proper operation. The auditor reviewed preventive maintenance records over the period 2021 through May 2024. Additionally, during monthly Cyanide Inspections, Marigold personnel test the generator by starting and running the generator.

Standard of Practice 4.2	Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 4.2**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.2, requiring the operation to introduce management and operating systems to minimize cyanide use, thereby limiting concentration of cyanide in mill tailings.

This ICMC Standard of Practice is not applicable, because Marigold is a heap leach operation and does not operate a mill.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 4.3**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.3, requiring the operation to implement a comprehensive water management program to protect against unintentional releases.

Marigold maintained the previous, comprehensive probabilistic, Microsoft© Excel© based water balance model developed in January 2011 and updated in 2012, developed by Knight Piésold Consulting. Marigold maintained and utilized the 2012 updated model throughout 2021, 2022, and 2023. In 2024 Marigold transitioned to a new comprehensive, probabilistic water balance in the GoldSim platform.

The GoldSim Model is comprehensive and includes process flows, normal precipitation, and multiple storm events (25-year and 500-year events).

Inputs to the model inflows to the model include site climate data and makeup water currently obtained from Marigold water supply wells. Outflow from the model is limited to evaporation and moisture uptake by fresh ore.

The model has three main dashboards for: forecasting inputs, storm events, and results.

On a monthly basis, Marigold inputs actual daily ore tonnage delivered to the heap. Future values are based on the current mine plan. Actual daily leach application rates are input monthly.

The model performs a probabilistic analysis (basis is 10 wettest years of "Precipitation on Record" for the climate station at Winnemucca) and a working analysis based on actual data. The 25-year 24-hour, 100-year 24-hour event, and 500-year 24-hour events are used during model runs to simulate available pond capacity and freeboard.

Marigold collects onsite precipitation daily from an onsite weather station and inputs the data into the water balance model for use in the working analysis. Historical rainfall (1950-2009) collected from a weather recording station located in Winnemucca was used to develop the model.

The Winnemucca data is of good quality as the location is near enough and at a similar elevation to be representative. Evaporation losses for drip emitters and wobblers are estimated. Marigold also maintains an on-site meteorological station that is audited and maintained by a third party and verified by the Nevada Division of Environmental Protection to be used for modeling purposes (specifically for air permit modeling). Data can be viewed in real time via a web browser and can be accessed off-site to monitor weather conditions.

The Marigold heap leach facility is designed and operated such that all upgradient stormwater runoff is diverted around the facility. Stormwater is routed away from the heap leach facility by diversion ditches sized to safely convey runoff from a 100-year, 24-hour storm event.

Marigold estimates snowpack as it occurs and inputs the data into the water balance model. A snowmelt coefficient of 0.6 accounts for sublimation, estimation errors, and loss to soak up in ore.

The Marigold operation is a zero-discharge facility. Therefore, the only losses considered by the water balance include solution losses through evaporation of spray application, pond evaporation, and moisture uptake by fresh ore.

The Marigold process pond system is designed to retain runoff generated by the 100-year, 24-hour storm event, and draindown from the heap leach pad over a 24-hour period, while providing two feet of freeboard. Marigold keeps rebuilt vertical turbine pond pumps and spare parts on site and maintains a diesel-powered emergency generator on site to provide emergency power in the event of a primary power outage. Additionally, if necessary during prolonged power outages, Marigold has the option of renting additional generators from nearby towns or cities that could arrive at the site within eight to 36 hours. Therefore, the water balance model does not account for power outages or pump and equipment failures.

Other factors considered by the water balance model include the active heap height, open pad liner area, open channel liner area, and ore characteristics (e.g., moisture, density, and porosity). The model uses a "Rain on Leach Coefficient" (assumes rainfall on stacked ore is absorbed and does not reach the ponds; however, consideration is given to rainfall on areas actively leached). Additionally, the model uses a "Snowmelt Coefficient", which accounts for sublimation, estimation errors, and loss to soak-up in ore.

The Marigold process pond system is designed to retain runoff generated by the 100-year, 24-hour storm event, and draindown from the heap leach pad over a 24-hour period, while providing two feet of freeboard.

Process Lead Operators monitor and operate process pond levels on a daily basis (each shift and throughout the shift) and informally record results in a log notebook prior to entering the Night Shift values into the "Daily Heap Leach Report." The levels recorded in the daily "Daily Heap Leach Report" are then entered into the Water Balance Model on a monthly basis. The entered values are rounded to the nearest whole number (rounded up). Actual measured data is entered for Barren Pond No. 2 and Pregnant Pond No. 2, which are maintained between 8- and 9-feet deep.

SOP "High Preg and Barren Pond Levels" incorporates the pond design parameters into the operating procedure for maintaining the process ponds at allowable operating levels. The SOP also provides procedures to follow during upset conditions.

Marigold Mine SOP GoldSim Water Balance Model Procedures and Task Training (May 2024), provides the GoldSim water Balance requirements for data input, updates and results, and use and reporting.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 4.4**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.4, requiring the operation implement measures to protect birds, other wildlife, and livestock from adverse effects of cyanide process solutions.

At the Marigold operation, open waters with WAD cyanide concentrations generally exceed 50 mg/L in the working ponds which are monitored on a consistent basis. The other process ponds provide surge capacity and remain empty under normal operations. Nonetheless, all of the active process ponds are provided with avian deterrent systems (i.e., netting or bird balls). Pregnant Pond 1 is not in use. In addition to the avian deterrent systems, the process ponds are surrounded by chain-link and wire mesh fence and perimeter fencing surrounds the Marigold site to minimize access by terrestrial wildlife and livestock.

Marigold uses netting to cover exposed pump boxes, sumps, and other areas where open solution or ponding occurs, such as at the toe of the heap. Other potential areas where open solutions may occur temporarily include the solution pipeline containment channels at the heap leach pad and ponds (in the event of a leaking or ruptured pipe) and on the heap itself. Framed netting is used to protect wildlife from these areas.

During the field component of this ICMC recertification audit, the auditor verified that the wildlife deterrent systems were in good repair.

Marigold applies leach solutions in a manner designed to avoid significant ponding on the heap surface and to limit overspray off the heap liner. Marigold utilizes both drip emitter application as well as wobbler spray application on the run-of-mine heap.

Drip emitters are used for normal leaching operations while the wobblers and drip emitters are employed on side slopes and/or inactive portions of the heap for evaporation and solution balance control. The Marigold ore types vary, with certain ore material having higher clay content and other material being very durable, free draining rock. Marigold rips the heap surface to an average depth of nine feet prior to leaching to enhance infiltration and minimize ponding.

During the field component of this ICMC recertification audit, the auditor did not observe solution ponding on the active areas of the heap. Marigold implements SOP "Heap Leach Operator" to address ponding on the heap by providing a range of potential control measures. Measures include reducing the application rate; reducing the number of emitters; covering the ponded area with netting; pumping ponded solution to other free draining areas; use of a surfactant to improve percolation; excavating surface channels to provide drainage; and turning off irrigation panels completely.

Preventing overspray of solutions off the lined pad area is a component of the SOP "Heap Leach Operator" and is monitored by leach operators during pre-shift inspections. Visual inspection during this audit did not identify overspray of solutions off the lined pad area.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 4.5**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.5, requiring the operation implement measures to protect fish and wildlife from direct or indirect discharges of cyanide process solutions to surface water.

The Marigold operation is designed and operated as a zero-discharge facility with no direct discharge to surface water. Marigold does not have indirect discharges to surface water.

Ephemeral surface water flows in the area west of the 8-South Pit, and to the east of the heap leach facility. Stream flow generally occurs in the spring following periods of precipitation. Several springs are present in the mine area; however, mining and processing operations are downstream of the springs or outside of the associated meteoric water collection basins.

An ephemeral stream is the closest surface water body, located roughly one-half mile to one mile away from the Marigold process facilities. A diversion dam, located upstream from the process facilities, diverts the ephemeral drainage west around the facilities.

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

The operation is

- ☒ in full compliance with
- ☐ in substantial compliance with **Standard of Practice 4.6**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.6, requiring the operation implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

The Marigold operation is designed and operated as a zero-discharge facility.

The project construction and operation include a number of seepage control technologies such as composite liner systems at the heap leach pad consisting of compacted, low-permeability soil liner overlain by geomembrane liners, double geomembrane liners with leak detection systems at the process ponds, geomembrane-lined containment channels for solution pipelines, and concrete secondary containment in process areas. The facility design and construction meets NDEP standards. The alluvium is the main groundwater storage unit in the mine area with bedrock storage upgradient in the primary pit development areas. The unsaturated zone thickness ranges from 530 feet at the south end of the site to about 280 feet at the north end.

The fluid management system for the heap leach facility consists of pregnant and barren solution ponds, a stormwater collection pond, processing and chemical storage facilities, a recirculation system, a synthetically lined heap leach pad with multiple cells, and appurtenant structures. The leach pad currently has 28 constructed cells. Depending on the date of construction, the cells have either a clay liner (inactive) or a synthetic liner over a compacted composite base. Internal berms covered with synthetic liner separate the cells.

The process ponds, which cumulatively make up the "pond system," are interconnected with synthetic-lined channels. The ponds are constructed with primary and secondary HDPE liners over a compacted clay base. A LCRS is installed between the primary liner and the secondary HDPE liner system designed to capture any solution before it reaches the compacted clay base of each pond and is designed to meet federal and state standards. Marigold reports the quantity of solution reporting to the LCRS to the NDEP in accordance with its WPCP. The Stormwater Pond is constructed with a single HDPE liner, does not have an LCRS, and can only contain process solution for up to 20-days per event.

Marigold is a zero-discharge facility and does not discharge process water to any location. The numerical standard for WAD cyanide in groundwater, applicable to the Marigold operation, is 0.20 mg/L (Drinking Water Standard). Marigold monitors groundwater quality at numerous wells (identified in the WPCP) both upgradient and downgradient of the process facilities. Monitoring frequencies vary between quarterly, semi-annually, and annually depending on the well. During this audit, the auditor reviewed groundwater quality data over the three-year period starting from the 2021 ICMC recertification audit. The data demonstrate that WAD cyanide levels were below the analytical detection limit (<0.01 mg/L) for all quarters.

The Marigold operation has not experienced seepage over the three-year period between ICMC recertification audits. All groundwater concentrations for WAD cyanide are below the analytical detection limit (<0.01 mg/L) for all quarters.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 4.7**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.7 requiring that the operation provide spill prevention or containment measures for process tanks and pipelines.

There have been no changes to any spill prevention or containment measures that are provided for all cyanide unloading, storage, mixing and process solution tanks since the previous ICMC audits, with the exception of the following: commissioning of the new Reagent Storage Facility (now Site 1), decommissioning of original Site No. 1 cyanide storage tank, decommissioning and repurposing of the Site 2 cyanide storage area and installation of the Barren Tank 3 and pumping at the pond side carbon processing area.

All cyanide process tanks at the Marigold operation are provided with secondary containment. The carbon columns, Barren Tank 3, and pumping system at the pond side carbon column area are located within a curbed concrete containment area with direct overflow to Barren Pond 1.

The original Site 1 cyanide storage tank was decommissioned and the new Reagent Storage Facility was commissioned and renamed Site 1 cyanide storage area. This Site 1 cyanide storage area has a curbed concrete containment area with direct overflow to Barren Pond 2. The storage tank foundation is solid mass concrete (i.e., the concrete containment slab).

The cyanide storage tank at Site 3 is a skid-mounted horizontal tank, which sets on support beams on top of the gravel layer within the lined leach pad area. The containments provided for all three cyanide storage tanks provide protection against seepage to the subsurface.

The process tanks at the Process Building, which comprise the Carbon Strip Circuit, are provided with concrete secondary containment. The concrete floor and stem walls of the Process Building provide secondary containment for the tanks and vessels located inside. The tanks and vessels either set directly on top of the concrete floor slab or are supported above the floor.

During this ICMC recertification audit, Marigold personnel confirmed that there have been three changes to the process areas. The addition of Barren Tank 3 to the pond side carbon area, expansion of the concrete containment to accommodate the tank. Site 2 cyanide storage area was decommissioned and repurposed for non-cyanide reagent storage purposes. The original Site 1 cyanide storage was decommissioned and the previously reviewed Reagent Storage Area was commissioned as Site 1 cyanide storage area.

No existing tanks have been modified, and no other modifications have been made that would affect the secondary containment requirements and capacities verified during the 2012, 2015, 2018, and 2021 ICMC audits and described below.

The expanded secondary containment provided for the Barren Tank 3 is more than adequate to contain the largest tank volume located within the containment in addition to the design storm event. The existing and expanded concrete containment is hydraulically connected via gravity flow to Barren Pond 1, which provides significant surplus capacity.

During the 2021 ICMC audit, the auditor confirmed that the concrete containment provided for the Reagent Storage Facility cyanide storage area (now Site 1 cyanide storage area) is sized for greater than 110% of the tank volume (750-ft^3) with a total capacity of 1,465-ft^3 providing an additional 715-ft^3 of precipitation storage. Additionally, The concrete containment is hydraulically connected via gravity flow to Barren Pond 1, which provides significant surplus capacity.

Cyanide solution or cyanide contaminated water collected in the secondary containment at Site 1, would report to the process pond system via gravity flow. At Site 1, Marigold would hose any residual spillage in the concrete containment into Barren Pond 1 and Barren Pond 2, respectively. Marigold implements SOP "Pumping Out Secondary Containment" to manage solution collected in the isolated containments. Procedures include pumping the spillage into the cyanide delivery truck or into the process circuit. Additionally, SOP "Heap Leach Operator" provides procedures for managing solution collected in secondary containment, which include pumping the spillage back into primary containment.

Cyanide solution or cyanide contaminated water collected in the secondary containment area at the Carbon Strip Circuit flows into a concrete floor sump inside the building. Collected water is pumped and directly conveyed to Barren Pond 1 via a buried pipe-in-pipe system.

Marigold provides spill prevention or containment measures for all cyanide process solution pipelines to collect leaks and prevent releases to the environment. Marigold places large-diameter process solution pipelines within HDPE-lined containment channels and concrete structures. Pipe-in-pipe systems are used for buried pipes and pipes located outside of lined or concrete containment. Buried pipes include those at road crossings and the pipeline connecting the Carbon Strip Circuit floor sump to Barren Pond 1. The buried pipe system between the Carbon Strip Circuit and Barren Pond 1 consists of an 8-inch diameter HDPE pipe inside of a 12-inch diameter HDPE pipe that reports to the Carbon Strip Circuit secondary containment where any leaks can be easily identified. During the 2015 ICMC audit, the auditor reviewed photographic evidence (of buried pipe-in-pipe system between Carbon Strip Circuit and Barren Pond 1).

Additionally, the barren solution pipelines are instrumented with radio alarms that alert operators of pressure losses. SOP "Pressure Drop Response Plan" describes the actions to take in the event of a pressure drop in the barren solution pipelines.

No pipelines requiring special protection needs were identified at the Marigold operation. There are no perennial surface water streams nearby. Trout Creek, an ephemeral stream, is the closest surface water body, located roughly one-half mile to one mile away from the Marigold process facilities.

A dam, located upstream from the process facilities diverts Trout Creek into Cottonwood Creek and around the facilities.

All cyanide process tanks at the Marigold operation are constructed of carbon steel. Process solution pipeline materials are stainless steel, carbon steel, HDPE, Polyvinyl Chloride (PVC), synthetic rubber (offload hoses), and synthetic rubber (small-diameter flex hose). These materials are compatible with cyanide and high pH conditions. The cyanide storage tanks, barren tank 3, and carbon trains are constructed of carbon steel.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 4.8**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.8 requiring that operations implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

Please refer to Location and Description of the Operation above for a list of the active cyanide facilities at the Marigold operation and to the previous ICMC Detailed Audit Findings Reports (December 2006, October 2009, March 2013, February 2016, 2018, and 2021) for the construction quality assurance and QA/QC documentation provided for the cyanide facilities in operation at the time of those audits.

New cyanide facilities and modifications to existing cyanide facilities constructed subsequent to the 2021 ICMC recertification audit, include:

- Barren Pump Feed Box 3; and,
- Heap Leach Pad Cell 23A.

Marigold implemented QA/QC programs during the construction of the projects outlined above. The Barren Pump Feed Box as-built was documented by Halon Engineering & Associates, Inc. and the Heap Leach Pad Cell 23A as-built was documented by Knight Piésold.

The construction QA/QC program conducted for the Barren Pump Feed Box and Heap Leach Pad Cell 23A addressed earthworks construction, structural, concrete, and geomembrane installation as applicable. The earthworks components include grading, transitional fill, low permeable subbase, and overliner placement. The concrete construction includes subgrade suitability and compaction testing, and concrete specifications and testing. The geomembrane installation includes welded seams, non-destructive seam testing, geomembrane destructive seam testing, and repairs.

Marigold retains all construction documentation associated with its cyanide facilities. The auditor verified onsite retention of heap leach facility construction reports. The retention of QA/QC construction documentation for the Barren Pump Box and Heap Leach Pad Cell 23A was also verified.

Halon Engineering & Associates, Inc., and Knight Piésold, competent engineering firms, conducted the QA/QC program for the construction projects. A professional civil engineer registered in the State of Nevada stamped the final construction reports. The reports provide a statement that the construction was performed and completed in accordance with design drawings and specifications, and current industry standards. In addition, the State of Nevada reviewed and approved the as-built reports for these facilities.

Cyanide facilities that were constructed or modified during this International Cyanide Management Institute (ICMI) audit cycle had available as-built documentation.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 4.9**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.9 requiring that operations implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface, and groundwater quality.

In accordance with its WPCP, Marigold implements the procedure "Field Sampling Protocols" as a field guide to standard environmental water sampling techniques. The WPCP and the WPCP Renewal Applications also provide groundwater and surface water monitoring procedures.

Marigold does not implement a written procedure for monitoring wildlife. Nonetheless, Marigold monitors for wildlife activity and mortalities daily as a component of the pre-shift area inspections and submits quarterly Wildlife Mortality Reports to the Nevada Division of Wildlife in accordance with its Industrial Artificial Pond Permit.

As documented in the 2009 ICMC audit report (conducted by Golder), the plan has been reviewed and approved by a professional engineer registered in the State of Nevada and a Hydrologist. The protocols are based on Code of Federal Regulations (CFR) 40 Part 136 – Guidelines Establishing Test Procedures for the Analysis of Pollutants. The Nevada certified laboratories used by Marigold, Energy Laboratories, SVL Laboratories and Western Environmental Testing Laboratory provide analytical protocols for detection limits, quality assurance, preservation, and holding times.

Marigold environmental personnel periodically update the Field Sampling Protocols in parallel with WPCP renewals, primarily to incorporate changes to water monitoring points. The protocols were last revised on February 27, 2024.

The NDEP reviews and approves all monitoring locations. The Marigold Environmental Manager reviews document updates for approval. The environmental manager has a Bachelor of Science Degree in Animal Science with thirteen years' experience in the mining industry.

The Field Sampling Protocols procedure specifies how and where samples are collected. The document identifies monitoring points, monitoring parameters, and monitoring frequency required by the WPCP, as well as the analytical profiles required by and reported to NDEP for the samples collected from the specified monitoring points. The document provides a map with the locations of the monitoring points. The State of Nevada has specific required sample parameter lists known as Profile I and requires only collection of WAD cyanide samples for monitoring purposes.

The document provides sample preservation techniques and holding times. The protocol includes chain of custody and transportation procedures.

Marigold records field conditions for sampling events on the Field Monitoring Sheets. These logs record the sampling point, date, time, initials of the sampler, static water level, transducer readings (if applicable, or water level meter readings), and comments such as surface water flow. Additionally, Marigold personnel complete a Groundwater Monitoring Field Sampling Checklist for each sampling day, designed to assist sampling personnel in preparation and completion of field sampling activities.

The form also functions as a record to formally document weather conditions and deviances in field conditions that may compromise sample integrity.

Marigold's monitoring program is designed to adequately characterize environmental media and to identify changes in a timely fashion. The media being characterized dictates the frequency of the samples. Marigold monitors wildlife activity and mortalities daily as a component of the pre-shift area inspections. Marigold monitors surface water quarterly when flowing. Groundwater monitoring is conducted quarterly, semi-annually and annually, depending on the well location. Leak detection systems are monitored daily. In the auditors opinion, these frequencies are adequate to characterize each medium.

PRINCIPLE 5 - DECOMMISSIONING

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

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 5.1**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 5.1 requiring that the site plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.

Marigold has developed written procedures to decommission their cyanide facilities at the cessation of operations. Section 4 of the Marigold Plan of Operations provides the Reclamation Plan, which includes, but is not limited to, stabilization, detoxification and disposal measures necessary to reclaim process ponds, heaps, and equipment.

In accordance with regulatory requirements, Marigold must submit a Permanent Closure Plan to the NDEP at least two years before the anticipated date of permanent closure.

The Permanent Closure Plan will incorporate procedures, methods and schedules for stabilizing spent process materials based on information and experience gathered throughout the active life of the facility. Marigold's current mine life is permitted through 2037.

Marigold has developed a Reclamation Schedule. This schedule provides the conceptual timeline for closing and reclaiming the heap leach facilities, which includes heap draindown and solution management.

As stipulated by regulatory permits, Marigold is required by the NDEP and the U.S. Department of Interior, Bureau of Land Management (BLM) regulations to review and update the Reclamation Plan and associated phased costs at least annually (NAC519.A). Marigold also updates its Plan of Operations and Reclamation Plan as any mine components change and during major permit revisions, as necessary. The most recent update to the Plan of Operations is dated August 1, 2023, and the prior version is dated May 2022.

Additionally, under an SSR corporate internal policy, financial obligations are updated (internally) quarterly, annually, or when the reclamation bond is updated.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 5.2**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with the Standard of Practice 5.2 requiring that the site establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.

Marigold uses the most current/approved version of the Standardized Reclamation Cost Estimator (SRCE), an Excel©-based cost-estimating model developed and approved by BLM and NDEP, to prepare reclamation cost estimates for bond updates. Marigold used SRCE version 1.4.1 Build 017b with 2023 cost data to calculate its most recent bond obligation and submitted the estimate to the BLM under the August 2023 modification to the Plan of Operations. Section C of the estimate provides costs for "Detoxification / Water Treatment / Disposal of Wastes" which includes the cyanide-related decommissioning measures outlined in its Reclamation Plan. Handling of hazardous materials includes the cost of decontaminating, neutralizing, disposing, treating and/or isolating all hazardous materials used, produced, or stored on the site. The costs for "Interim Fluid Management" and "Process Fluid Stabilization," included within Section C of the SRCE model, are calculated using the Nevada Standardized Process Fluids Cost Estimator, an Excel©-based model.

The bond estimates are based on costs for third-party implementation of the closure and reclamation activities, and include indirect costs such as Engineering and Design, Contingency, Insurance, Performance Bond, Contractor Profit, Contract Administration, and a BLM Indirect Cost.

As stipulated by regulatory permits, Marigold is required by the NDEP and the BLM regulations to review and update the Reclamation Plan and associated costs at least annually. Marigold updates its reclamation bond during any Minor or Major Modification to the Reclamation Permit or Plan of Operations. Additionally, financial accounting procedures require that mine closure liabilities be reevaluated every year and under the corporate internal policy, financial obligations are updated quarterly or when the reclamation bond is updated.

For this 2020 audit cycle Marigold has had a positive amount of bond accepted compared to the bond amount obligated.

Marigold most recently updated its reclamation cost estimate to correspond with the August 2023 minor modification to the Plan of Operations. The 2023 phase bond cost estimate provides calculations to fully decommission all cyanide facilities. Marigold has posted and regulatory agencies have approved the reclamation bonds to fully fund decommissioning of cyanide facilities.

PRINCIPLE 6 – WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 6.1**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The site is in full compliance with Standard of Practice 6.1 requiring that the site identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.

Marigold has developed procedures describing how cyanide-related tasks are to be conducted. The specific Standard Operation Procedures (SOPs) Marigold currently implements for the operation of its cyanide facilities include personnel safety and PPE requirements. SOP "Cyanide Safety" requires workers to monitor all enclosed areas or confined spaces for HCN content (using a gas detector) before entering. SOP "Process Maintenance Decontamination Procedures" describes how to perform equipment decontamination prior to maintenance and requires workers to complete a "Confined Space Entry" Permit if a confined space must be entered to perform work.

The Marigold cyanide-related SOPs require pre-work inspections and use of proper PPE. In addition to the specific task-related SOPs, Marigold performs Area Inspections prior to every shift, whereby workers inspect for any conditions that may adversely affect safety or health.

Marigold conducts routine safety meetings, whereby workers have the opportunity to provide input regarding health and safety matters. Additionally, Marigold operates under an "open door policy" and encourages workers to voice concerns and make recommendations for improvement.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 6.2**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 6.2 requiring that the site operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

The SOP "Heap Leach Operator" defines the target pH level for controlling evolution of HCN gas at 10 to 10.5. According to this SOP, Marigold takes samples at key locations based on operations and adjusts levels at Barren Pond accordingly by adding caustic solution.

Marigold receives cyanide in liquid form and the potential for the creation of cyanide dust would be extremely low. Marigold conducts periodic HCN surveys of all cyanide process areas based on any changes to the operations. Marigold cyanide facilities are located outside in open-air environments. The last surveys were completed in June 2021, which included Site 1, Mill, Site 3, the Process Ponds, and portions of the leach pad.

The June 2021 survey remains applicable as there have been no changes to these facilities.

Marigold cyanide facilities are located outside in open-air environments. The Marigold cyanide-related SOPs require use of proper PPE and SOP "Cyanide Safety" requires workers to monitor all enclosed areas or confined spaces for HCN gas content (using a handheld gas detector) before entering. The handheld detectors are set to alarm at 2.5 ppm to allow workers to investigate/mitigate elevated HCN readings. A second alarm is set at 4.7 ppm and workers must evacuate the area when the alarm sounds. Portable HCN monitors are used during offload activities. Marigold has installed a fixed HCN monitor on top of Barren Tank 3, where workers have access, to the same alarm levels as the portable HCN monitors; at 2.5 ppm and 4.7 ppm.

User manuals recommend the following calibration frequency: initially then monthly, depending upon use and sensor exposure to poisons and contaminants." The user manual recommends "bump" testing prior to each use. Marigold utilized a "docking" station and online software to conduct the calibration and testing. The docking station uploads the calibrations and bump tests to a database, which maintains the records for each device, for at least 3-years. In addition, the software is programed to send notices to key personnel in the event of equipment, sensor, calibration, or testing failure.

The manufacturers manual for the newly installed fixed HCN monitor recommends the following calibration frequency: initially, within 30-days of installation and after that no longer than once every 90-days, depending upon use and sensor exposure to poisons and contaminants. Due to the timing of the installation the auditor reviewed the initial and 30-day calibration records. Based on discussions with site personnel the fixed HCN monitor records would be retained for the life of the device or a minimum of 3-years.

Marigold has installed signs advising workers that cyanide is present and of the associated dangers. These areas include the leach pad road, process solution tanks, and pipelines, process ponds, cyanide offload/storage areas, and all process areas. The signs state cyanide in use, no smoking, eating, or drinking. In areas where reagent-strength cyanide is present (i.e., each cyanide offload/storage area), there are signs stating the cyanide strength (30%), required and specific PPE, notice not to smoke, eat or drink, emergency response procedures, and locations of first aid, the emergency shower/eyewash, fire extinguisher, and cyanide antidote.

The purchase contract between Marigold and Cyanco state that the Seller (i.e., Cyanco) is responsible to be compliant to the International Cyanide Management Code, which includes the addition of colorant dye.

The auditor reviewed the site Safety Data Sheets (SDS) for liquid cyanide which indicated that the liquid cyanide color was red.

Emergency showers, low-pressure eyewash stations, and appropriate fire extinguishers are located throughout the process areas. Additionally, an ABC dry chemical fire extinguisher is mounted next to the door of each Safety Shed. Shower/eyewash stations are located on the upper level and ground floor of the Carbon Strip Circuit (inside the Process Building) and fire extinguishers are located throughout the building. There is a portable emergency eyewash station, which includes a drench hose for spot showers at the Booster Pad Station.

Marigold tests the shower/eyewash stations before each shift and records the results in the Eyewash Logbooks. Logbooks are located in the Safety Sheds and the offload/storage facilities. Inspections of the shower/eyewash stations located at the Process Building are recorded in the "Mill Operator Logbook." Marigold also tests the stations at the cyanide/offload storage facilities before each offload. During this audit, the auditor spot-checked the showers and eyewashes to ensure proper operation and water pressure.

The Marigold Process Department performs monthly inspections of the fire extinguishers within their area. Additionally, an outside contractor performs annual maintenance, inspections and testing of the fire extinguishers.

Marigold labels cyanide storage tanks, process tanks and piping alerting workers of the contents and flow directions. Additionally, Marigold places signs warning of cyanide on pump boxes, gates, and doorways to buildings. Adequate signage was located throughout the offload, heap leach and process areas.

SDS and safety procedures regarding cyanide are provided at the two-cyanide offload/storage facilities and in the administration building. All written information is in English, the language of the workforce.

Marigold must complete Mine Safety and Health Administration (MSHA) reports that include any cyanide-related worker exposures, which require treatment or result in death (30 CFR Part 50). Marigold Safety and Environmental personnel indicated that no such incidents have occurred at the Marigold Mine over the three-year period between the 2021 ICMC recertification audit and this recertification audit. Additionally, the Water Pollution Control Permit (WPCP) requires oral reporting to the NDEP of instances of non-compliance with the WPCP followed by a written incident report. No cyanide-related human mortalities or injuries have occurred during this audit period.

Marigold implements an "Incident Investigation Program" providing guidance and the basic requirements for conducting incident investigations at the Marigold Mine. The program provides general guidelines and defines roles and responsibilities. The Safety Manager is responsible for administering and managing the program.

Marigold's Incident Investigation program includes an "Incident Investigation Report," which includes an Incident Severity and Reporting Matrix, general information regarding the incident, employee/eyewitness statement, controls, causes, and corrective actions. The Marigold Superintendent/General Foreman, Department Manager, Safety Manager, and Environmental Manager sign completed reports.

Marigold has a Severity Factor Table, matrix, to capture the difference between safety & health injuries or illnesses. Environmental impacts are also included to take into consideration the longevity of any related incidents and amount of area impacted, including the release of all chemical products.

Marigold has not had cyanide exposure incident over this audit period as such incident reports were not available for review. Based on the regulatory requirements and Marigolds past reporting the auditor concluded it was reasonable to conclude the program is being implemented.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 6.3**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 6.3 which requires that the site develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

The Marigold Employee Response Plan (ERP) provides a listing of Medical and First Aid Equipment and Communication Equipment.

The Medical and First Aid Equipment includes; oxygen, resuscitator, automatic external defibrillators, CyanoKit®, Amyl Nitrite (when available) and medical trauma kits (Jump Kits). The defibrillators are located at key locations at the site. Oxygen, resuscitators, and Jump Kits are located at the cyanide offload/storage facilities, and other key locations throughout the mine site. The offload/storage facilities have potable water/eyewash showers.

Marigold has one CyanoKit® which is located in the Emergency Response Vehicle. In addition to the cyanide antidote Marigold has Amyl Nitrite on-site that personnel are allowed to administer. Marigold transports the cyanide antidote to the hospital with the victims.

The primary means of communication while on-site is the mine radio system. Marigold personnel are assigned a mine radio at the start of each shift. Voice over Internet Protocol (VOIP) telephones are accessible in the mine buildings. Additionally, a satellite phone is located at the Mine Dispatch Center and available for use in the event of an emergency and/or loss of mine radio and cellular or VOIP communications.

The monthly inspections conducted in accordance with SOP "Monthly Inspection (Cyanide)" include verifying the presence, expiration date of and the temperature of the stored Amyl Nitrite (when available). In accordance with SOP "Escorting and Monitoring the Offloading of Cyanide Deliveries," the Marigold escort inspects the Jump Kits and verifies the seal of the Amyl Nitrite (when available) are intact prior to each offload (documented on the "Cyanide Delivery Log").

The Marigold Safety Department inspects emergency equipment and supplies stored in the emergency vehicle and the rescue trailer monthly. The Jump Kit inspections performed by the Safety Department are documented on the forms titled "Monthly Jump Kit Inventory Checklist." One inspection checklist titled "Ambulance Inspection checklist" covers the Emergency Response Vehicle equipment and medical supply inventory, as well as the general condition of the vehicle (e.g., tires, lights, fuel, oil, etc.).

The ERP is a detailed planning tool intended to provide in-depth information on various types of emergencies that could typically occur at the mine including cyanide exposures.

Appendix A of the plan implements "Facility Pre-plans," which provide systematic procedures that supervisors and Emergency Response Team (ERT) would typically implement during a cyanide emergency. Appendix B provides systematic procedures that Incident Management Team would typically implement during an emergency. While Appendix C lists all applicable resources (with telephone numbers). The Facility Pre-plans provides procedures for worker cyanide exposure: ingestion, inhalation, and adsorption through skin or eye contact, first aid and medical treatment, administering the antidote, transportation, and decontaminating the victim.

At the time of this ICMC recertification audit, Marigold had approximately 37 site personnel emergency responders as members of the Emergency Response Team, all of whom are trained to respond to cyanide exposures. Marigold maintains four or five Emergency Medical Service (EMS) personnel on site at any one time. Marigold has a dedicated Emergency Response Vehicle located on site, fully equipped to treat workers exposed to cyanide (e.g., oxygen, automatic external defibrillator and a cyanide antidote). They also have two emergency response trailers. One of which is dedicated for hazardous materials response containing, level A Hazardous Materials (HAZMAT) suits, decontamination equipment, and self-contained breathing apparatuses.

The Emergency Response Team members are trained and authorized to administer amyl nitrite. Marigold relies on outside responders to administer the CyanoKit®, which will be transported with the victim to the hospitals.

Marigold Emergency Response Team also has a dedicated hazardous material response trailer equipped with all necessary tools and equipment to respond at a HAZMAT Technician level. Equipment includes decontamination basins, showers and appropriate neutralizing materials for various chemical response, including sodium cyanide, Self-contained Breathing Apparatus (SCBA), and Level A HAZMAT suits.

The "Facility Pre-plans" provide systematic procedures for responding to a cyanide exposure incident, which includes the protocol for transporting victims to local, offsite medical facilities.

Generally, Marigold EMS Responders stabilize the victim and contact offsite responders via telephone by dialing 911. The Marigold Emergency Response Vehicle transports the victim for rendezvous with the Battle Mountain Hospital or the Humboldt General Hospital ambulance, generally at Interstate 80, Exit 216. Alternatively, Marigold EMS personnel may decide to contact the medical helicopter for air evacuation depending on the severity of the incident, whereby the Marigold Emergency Response Vehicle is used to transport the victim to the onsite helipad. Marigold transports the cyanide antidote with the victim.

Marigold provided letters to the local Hospitals notifying them that liquid sodium cyanide is used within the hospitals' response areas and requesting verification that the hospitals understand that a potential cyanide exposure could occur at the Marigold Mine and that the hospitals are able to respond to a cyanide poisoning. The letters informed the hospitals that cyanide antidotes (Amyl Nitrite) are located at the mine and that antidotes (CyanoKit®) will be transported with the victim to the hospitals.

The letters asked for written confirmation that the hospitals maintain cyanide antidote kits (Nithidote and CyanoKits®) at the hospital. Marigold is confident from past experience with both hospitals that their staff understands that a potential cyanide exposure can occur at the Marigold Mine site and its staff is able to respond appropriately to a cyanide exposure and that they have the cyanide antidote kit (CyanoKit®).

PRINCIPLE 7 – EMERGENCY RESPONSE

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

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 7.1**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 7.1 which requires that the site prepare detailed emergency response plans for potential cyanide releases.

The Marigold Mine Emergency Response Plan lists Medical Illness and Injuries, Unplanned Chemical Releases, Loss of Process Solution Containment, and Power Failures as a few of the many potential Operational Emergencies. The Plan contains a list of medical and first aid equipment (Marigold Emergency Response Vehicle with onboard equipment, basic first aid kits, medical trauma kits, and cyanide antidotes), firefighting equipment, mine rescue equipment, chemical spill or release, containment, cleanup materials and equipment, communications equipment, and mobile equipment. The Facility Pre-plans include emergency procedures for cyanide medical emergencies, hazardous materials spills, confined space rescue, process pond overflow, and heap leach failure or washout.

The ERP considers the potential cyanide failure/release scenarios, as appropriate for the operation's circumstances. Failure/release scenarios include:

- HCN releases in concentrations exceeding 4.7 ppm,
- Cyanide transportation emergencies,
- Cyanide spills occurring both within and outside of containment, this would include spills while offloading cyanide,
- Fires including the requirements to check for explosion hazards, flammable storage nearby, and chemical hazards (solid, liquid, or gas),
- Spills from trucks, tanks, pipes, pumps, and other sources collected in the secondary containment.
- High Preg or Barren Pond Levels,
- Power outages and pump failures and
- Heap leach pad stability failures.

The Marigold ERP states that in the event of a cyanide transportation emergency, Marigold will provide emergency response in the interim until the transporter's response team arrives.

The emergency response plans, procedures, and Facility Pre-Plans provide specific response actions with adequate detail to address the types of releases and incidents that may reasonably be expected to occur at the Marigold site. The Emergency Response Facility Pre-Plans each have procedures for clearing personnel and potentially affected communities, conducting "Post Incident Actions", and provide for recording notes and observations to prevent future releases.

The emergency response plan provides specific response actions for patient evaluation, use of cyanide antidote/s, and other cyanide and non-cyanide related medical first aid.

The medical first aid includes; personnel decontamination, scene safety, use of oxygen, and other first aid measures.

The emergency response plan provides specific response action for control of releases at their source including shutting down the source of the spill/release, containing the spill by berming, damming, or otherwise limiting the extent of flow, pumping standing solution back into containment, removing contaminated soil to an appropriate location, and reporting spill quantity, concentration, and cause to the Environmental Department.

The ERP provides systematic procedures for responding to cyanide spills (reagent-grade) both within and outside of concrete containment and provides procedures for mitigating affected soils. Additionally, steps include:

- Immediate measures will be taken to halt the release by sealing the leak in a pipeline or tank, shutting down the pipeline, or by other appropriate measures;
- Emergency containment structures will be constructed, if necessary, to minimize the extent of the release and prevent it from reaching natural drainages;
- Spilled cyanide solutions will be neutralized as necessary with hypochlorite, hydrogen peroxide, or other acceptable methods;
- Spills of non-solution cyanide will be mixed with absorbent materials as necessary to minimize cyanide dust generation during cleanup (Marigold uses solid cyanide in its laboratories only);

Marigold has an internal incident investigation, notification, and corrective and preventive actions process. Additionally, site permits include methods for prevention, containment, and handling of spills and/or releases of materials outside containment (i.e., the fluid management system) and outlines responsibilities for notification of the various state and federal agencies in the event of a release.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 7.2**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 7.2, which requires that the site involve site personnel and stakeholders in the planning process.

The Marigold site is fairly remote with the nearest community (Valmy) located over three miles away. Marigold's Senior Safety Coordinator is an active Local Emergency Planning Committee (LEPC) committee member. Several Marigold personnel serve as alternate committee members as well. In accordance with the Marigold Emergency Response Plan, local emergency agencies are encouraged to participate in emergency drills. In 2023, Marigold conducted Site Readiness Drill, Marigold conducted a cyanide-related mock drill involving Humboldt County emergency planning member. Marigold trains with the Valmy Fire Department, with several ERT employees on the Valmy Fire Department.

Marigold provides the opportunity to communicate issues of concern with the public through LEPC meetings.

Additionally, the regulatory process for new permits and permit revisions provides opportunity for public review and comment associated with potential releases. The WPCP is renewed every five years and each renewal provides a formal opportunity for public comment. As a courtesy, Marigold notifies the Humboldt County Commissioners of WPCP revisions. The WPCP requires Quarterly and Annual Water Pollution Control reports be submitted to NDEP and these reports are public documents. The current WPCP permit, effective as of February 12, 2024, is valid until February 12, 2029. No public comments were received during the public comment period held for the most recent permit renewal.

Marigold has made formalized arrangements with the local hospitals and sent letters to the Battle Mountain General Hospital and the Humboldt General Hospital regarding the use of cyanide at the Marigold Mine. Marigold notified the hospitals that it uses sodium cyanide within the hospitals' potential response areas and requested verification that the hospital staff is able to respond to potential cyanide exposures. The letters state that hospitals may be called upon to transport and/or treat the person, and informs the hospitals that cyanide antidotes are located at the mine and would be transported with the patient to the hospitals.

Marigold completed the most recent update to its ERP in November 2023 and provided a copy to the LEPC for review and use.

Outside entities having a defined role in the ERP participate in ERT training (Valmy) and are invited to participate in mock drills, training, and implementation exercises.

Standard of Practice 7.3	**Designate appropriate personnel and commit necessary equipment and resources for emergency response.**

The operation is

- ☒ in full compliance with
- ☐ in substantial compliance with **Standard of Practice 7.3**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 7.3 which requires that the site designate appropriate personnel and commit necessary equipment and resources for emergency response.

According to the ERP, the onsite Shift Supervisor responsible for the area where the emergency occurs, or his/her designee, will assume responsibility as the Incident Commander until relieved by a senior supervisor or manager. The Department Head or the next senior manager or supervisor of the affected area, becomes the Incident Commander. Duties of the Incident Commander include commanding, controlling, and communicating the response.

The ERP contains a list identifying the current Marigold Emergency Responders (i.e., Emergency Medical Responders and Emergency Medical Technicians). The Emergency Response Plan provides emergency contact numbers for the Cyanco Response Team and relevant local external emergency agencies, and list Mine Emergency Responders as a resource under Applicable Resources. Depending on the type of emergency, the Mine Emergency Responders may include Medical and HAZMAT Response Teams.

The Emergency Response Plan requires training ERT members; such as Patient Assessment – Medical, HCN exposure, and gas monitor; inspections; patient loading and handling, scene size up; bleeding control and patient extrication, and Cardiopulmonary Resuscitation (CPR) and Automated External Defibrillator (AED).

The Emergency Communications section of the ERP identifies 9-911 as the number used to contact all emergency agencies. The ERP provides systematic Mayday call-out procedures. The primary means of communication at the mine is two-way radios. Channel 1 is the primary channel for all emergency communications. If Channel 1 is not available, Channel 2 is used. When an emergency occurs in an area that uses another channel, the emergency is reported on all channels and then all further communications occur on Channel 1. Marigold established Channel 4, which is restricted to the Mine Emergency Response Team. Company hard-line. VOIP and cellular phones are used to convey private information not passable on two-way radios.

The ERP provides an Emergency Organization Chart. The Safety Department and the Environmental Department will assist the Incident Commander at the incident scene if the incident is located at the mine site. Other departments (listed in the ERP) will provide needed assistance to the Incident Commander as required. The General Manager (or his/her designated representative) is the only spokesperson that corresponds with the media, non-mine personnel or government agencies (except to make required regulatory reports). If the General Manager is absent, Marigold refers all media inquiries to the SSR Corporate Office. Department Managers are appointed and authorized to act on behalf of the General Manager in his absence.

The ERP includes an Emergency Equipment List, which provides a listing of Medical and First Aid Equipment, Fire Fighting Equipment, Mine Rescue Equipment, Chemical and Cleanup Materials and Equipment, Communications Equipment, and Mobile Equipment (i.e., mobile fleet). SOPs list appropriate PPE required for each task.

The Marigold Safety Department has developed inspection procedures and checklists to inspect emergency response equipment to ensure its availability.

The Marigold ERP describes the roles of outside responders, medical facilities, and communities in the emergency response procedures.

Marigold has made formalized arrangements with the local hospitals. Marigold notified the hospitals that it uses sodium cyanide within the hospitals' potential response areas and requested verification that the hospital staff is able to respond to potential cyanide exposures. The letters state that hospitals may be called upon to transport and/or treat the person, and informs the hospitals that cyanide antidotes are located at the mine and would be transported with the patient to the hospitals.

Marigold completed the most recent update to its ERP in November 2023 and provided a copy to the LEPC for review and use.

Outside entities having a defined role in the ERP are invited to participate in mock drills, training, and implementation exercises.

Standard of Practice 7.4	Develop procedures for internal and external emergency notification and reporting.

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 7.4**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance Standard of Practice 7.4 which requires that the site develop procedures for internal and external emergency notification and reporting.

The ERP provides contact information for notifying management, outside response providers, and medical facilities. The ERP actions lists contained on each Emergency Response Pre-Plan provide notification procedures. The ERP provides the protocol for internal communications. The WPCP provides reporting requirements for spills and releases and describes notification requirements, including notifications to the following agencies is required: 1) NDEP; 2) Nevada Division of Emergency Management (Notification under Comprehensive Environmental Response Compensation and Liability Act (CERCLA)); and 3) National Response Center (Notification under Section 304 of the Community Right to Know Act). The WPCP provides specific notification requirements, procedures and contact information for each agency. Additionally, Marigold must report to the State and LEPC, releases involving over 10 pounds of cyanide, or of reportable quantities of other hazardous substances, beyond the facility boundary that may potentially result in exposure to individuals outside of the facility boundary.

The Marigold ERP stipulates procedures for communication with the media. The General Manager or his/her designated representative is the only person that corresponds with the media, non-mine personnel, or government agencies (except to make required regulatory reports). If the General Manager is absent, all media inquiries are referred to the SSR corporate office.

During this audit period Marigold did not experience a cyanide incident that required reporting to ICMI.

The Marigold ERP includes specific protocols to provide the ICMI an initial report of a cyanide event. The protocol includes: reporting within 24-hours by phone or email. The protocol includes the ICMI reporting number and email. Additionally, an outline of required information to properly report to ICMI is provided.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 7.5**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 7.5 which requires that the site incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

Marigold SOPs provide the procedures for responding to cyanide spills outside of containment. Immediate actions include reporting the spill to the Environmental Department immediately upon discovery. Environmental personnel will then refer to the WPCP reporting requirements and verbal instructions from NDEP on how to handle/remediate/sample the spill. The SOP provides the following remediation actions and general guidance:

- Wash concentrated cyanide solutions into process ponds using solution with a pH of 10.3 or greater.
- Pump accumulated solution from outside of containment into containment or into an appropriate vessel that is labeled for cyanide.
- Collect materials and information necessary to complete an incident report.
- Excavate soils impacted by liquid sodium cyanide and/or process solutions and place on the leach pad.
- If unable to access the impacted area with removal equipment, appropriate personnel may treat the soils with sodium hypochlorite (common bleach available in the Warehouse or Battle Mountain) to destroy any residual cyanide. Treat with 3.6 pounds of sodium hypochlorite to every pound of sodium cyanide released. The Environmental Department will be consulted for specific treatment steps prior to initiating.
- Environmental personnel will perform confirmatory sampling per NDEP and WPCP requirements to ensure no material remains with WAD cyanide concentrations above the drinking water standard of 0.2 mg/L.

Marigold continues to provide bottled water to all employees, contractors, and visitors as a courtesy; however, in 2012 the mine completed permitting of a Nevada-certified potable water system that draws source water from a well (WW1) located on the far north side of the mine property, approximately 2.8 miles away from the process facilities. The well provides potable water that meets all state and federal drinking water standards without treatment; Marigold pumps the water through a chlorination system prior to transferring it to a potable water storage tank and distribution system (chlorination is required per state regulations and is not considered treatment). The distribution system feeds the administration, process, truck shop, and safety buildings. There is currently (1) certified, potable water operators employed or contracted at Marigold that oversee the management and operation of the water system.

A release from the operation could not reasonably affect drinking water supply. Well WW1 is the only drinking water supply located nearby the Marigold site. The nearest other drinking water supplies to the mine include domestic wells in Valmy (approximately three miles away), a regulated potable water well at the Valmy rest area, and a regulated potable water well at the Lone Tree Mine (approximately five miles away). As mentioned above, Marigold also provides bottled water, which would serve as an alternate drinking water supply.

Marigold SOP's provide procedures for responding to cyanide spills outside of containment and contains a warning not to use sodium hypochlorite near oil or petroleum products or any surface water sources.

Marigold will conduct necessary monitoring activities in the event of a release in accordance with its WPCP and in coordination with NDEP. The WPCP requires routine inspections and monitoring of the fluid management system to ensure that any discharge is identified and managed in accordance with permit conditions and Nevada State Mining Regulations (NAC 445A.350-447). The protocols are based on CFR 40 Part 136 – Guidelines Established Test Procedures for the Analysis of Pollutants under the Clean Water Act. The Marigold WPCP presents procedures, parameters to be monitored, and analytical protocols.

The number and location of soil samples are determined based on the size of the spill and area of impact.

In accordance with the WPCP, in the event of spills or releases, Marigold must take all available and reasonable actions, including more frequent monitoring, to: determine the effect and extent of the incident; minimize any potential impact to the waters of the State, domestic animals and wildlife; and to minimize the endangerment of the public health and safety. NDEP may require Marigold to submit a written report summarizing any related actions, assessments, or evaluations, and include any other information necessary to determine and minimize potential impacts.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 7.6**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 7.6, which requires the site to periodically evaluate response procedures and capabilities and revise them as needed.

The Emergency Response Plan requires that the Marigold Safety Manager review the ERP once per year and revise it periodically, as necessary. The Safety Department makes all revisions to the ERP. If there are major changes to the ERP, the changes are communicated to mine personnel during safety meetings before going into effect and during annual refresher training.

Marigold periodically conducts mock drills in accordance with its Emergency Preparedness Procedure. Marigold provided documentation for three cyanide-related mock emergency drills conducted subsequent to the 2021 ICMC recertification audit. During this ICMC audit cycle, Marigold conducted three cyanide-related mock drills that tested the entire emergency response procedures; from initiation to closeout, and the emergency response team capabilities.

The mock drills included employee exposures and releases. The 2022 mock drill included an employee exposure with a chemical incompatibility, and release into containment. The 2023 mock drill focused on cyanide transportation release. The 2024 mock drill included a cyanide exposure and release out of containment.

Marigold's Emergency Preparedness Procedure provides for a Drill Debrief that requires all crisis response exercises will be formally critiqued with the objectives to:

- Evaluate the effectiveness of the response to prevent or mitigate adverse impacts
- Improve overall crisis response, including the Incident Management Team checklists, facility pre-plans, etc.
- Strengthen and improve the Incident Command System and outside agency coordination
- Promote teamwork among all personnel involved in responding to emergencies
- Promote a self-correcting system where gaps are identified and corrected in a timely manner

The 2022, 2023, and 2024 mock drill records included debriefs and corrective action plans. While there are provisions in the ERP to conduct a critique and update procedures, as appropriate, after an actual cyanide emergency, , there have been no actual cyanide-related emergencies requiring the implementation of the ERP.

PRINCIPLE 8 – TRAINING

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

Standard of Practice 8.1	**Train workers to understand the hazards associated with cyanide use.**

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 8.1**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 8.1 which requires that the site train workers to understand the hazards associated with cyanide use.

The Marigold Safety Department provides training to all Marigold employees and visitors regarding recognition of the cyanide materials present at the operation, the health effects of cyanide, symptoms of cyanide exposure, and procedures to follow in the event of exposure. Process employees are trained on SOP "Cyanide Safety Process," which provides guidance on hazard recognition; the physical properties of sodium cyanide; proper PPE; general precautions and safety rules; health hazards and exposures to HCN gas; symptoms of cyanide poisoning; emergency response, first aid and medical treatment; administering the antidote, and decontamination of equipment prior to performing work. This SOP includes training requirements and an acknowledgment block, which records the date training is completed and the Instructor/Supervisor and trainee signatures.

The "Marigold Cyanide Training" slide presentation covers uses of cyanide at the Marigold operation, cyanide toxicity, HCN gas characteristics and threshold limits, exposure effects and symptoms, emergency response procedures, PPE, first aid treatment and antidotes (locations, contents and use). Marigold uses this presentation material to train all employees. Additionally, all employees and contractors view the Marigold hazard training video (which covers cyanide).

The Marigold Process and Environmental departments also provide sections of the New Hire Training, which include a basic overview of air, land, vegetation, water, wildlife (controls), spills (awareness, tracking, prevention), and Corporate Social Responsibility. It also contains a slide talking about Marigold's Cyanide code certification, a very high-level overview of what it covers and discussion that non-compliance with Marigold's policies/procedures related to cyanide management is grounds for disciplinary action.

Marigold provides annual refresher training regarding cyanide safety. The latest site wide cyanide training was in March 2024. Marigold uses the "Marigold Cyanide Training" slide presentation for annual refresher training.

Marigold has a comprehensive safety training program, which includes cyanide safety. The auditor reviewed personnel files to verify that employees receive required training and records of training are retained for the employees period of employment.

Standard of Practice 8.2	**Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.**

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 8.2**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 8.2 which requires that the site train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community, and the environment.

Marigold provides training for each of the cyanide-related SOPs currently implemented at the Marigold operation. Completion of "Training Acknowledgment" cards, which document training dates and signatures of instructors and trainees, are required for all cyanide-related (and non-cyanide-related) work tasks. The "Training Acknowledgment" cards themselves do not authorize trainees to perform the associated work tasks unsupervised; however, the trainee must complete the training requirements and receive an MSHA Form 5000-23 before performing the tasks unsupervised. Process Supervisors and lead operators provide the required training, which includes review of the related SOP and hands-on demonstration. This task-specific training supplements the cyanide safety training provided to all process employees.

The auditor interviewed the Process Operator responsible for escorting the cyanide delivery truck during an offload, regarding his primary responsibilities outlined in SOP "Escorting and Monitoring the Offloading of Cyanide Deliveries," and he demonstrated a strong understanding of this task. The Process Operators personnel file included records of the task training that he has received for cyanide-related SOPs.

The Marigold SOPs are used for task training, each SOP contains the required information to safely complete cyanide related tasks. In addition to the SOPs, Marigold implements "Part 48 Training Plan" required by MSHA 30 CFR, Part 48 (Surface). This plan identifies approved instructors and tasks covered under different training programs (i.e., annual refresher, new miner, experienced miner, and task and hazard training).

Process Supervisors and lead operators provide the required task training, which includes review of the related SOP and hands-on demonstration, prior to new employees performing a work task unsupervised. The Safety Manager, the Senior Safety Coordinator, and many of the EMS responders are MSHA Certified Blue Card Instructors.

During this ICMC recertification audit cycle, Marigold indicated that Cyanco, an ICMC certified cyanide producer, provided "Cyanide Safety" training to Marigold process personnel.

Marigold trains all process employees on SOP "Cyanide Safety" and each task-specific SOP identifies hazards associated with cyanide. Completion of "Training Acknowledgment" cards is required for all cyanide-related (and non-cyanide-related) work tasks. The trainee must complete the training requirements and receive an MSHA Form 5000-23 before performing the tasks unsupervised.

Marigold provides task-related refresher training if a worker has not performed the task in over a one-year period. Additionally, cyanide safety training is provided annually.

Certain cyanide-related SOPs include written exams that employees must pass before performing the tasks. SOPs requiring written exams include "Cyanide Safety, and "Sodium Cyanide Spills."

Marigold also conducts Field Level Risk Assessments at the beginning of special projects and non-routine tasks (and randomly) to evaluate and adequately control hazards.

Prior to signing-off on MSHA task training the instructor is required to conduct visual observations that the employee can conduct the task safety.

The Safety Department manages and maintains training records for all employees. Each employee file contains a history of training completed over the duration of employment. The training records include the name of the employee, trainer, date of training, and topics covered. In many cases, the record of training history includes a column documenting the "Proficiency" of the trainee and certain cyanide-related SOPs include written exams that employees must pass before performing the tasks (e.g., "Cyanide Safety" and "Sodium Cyanide Spills"). In addition, Part 48 training requires the instructor to verify proficiency prior to issuing the MSHA Form 5000-23. As verification, the auditor reviewed the personnel file of select operations personnel (employed 2014–present).

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

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

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 8.3 which requires that the site train appropriate workers and personnel to respond to exposures and environmental releases of cyanide.

The Marigold Safety Department provides training to all Marigold employees on SOP "Cyanide Safety," which among other topics provides guidance on emergency response, personnel decontamination, first aid and medical treatment, and administering the antidote.

The Marigold Process and Environmental departments also provide sections of the New Hire Training, which includes a basic overview of air, land, vegetation, water, wildlife (controls), spills (awareness, tracking, prevention), and Corporate Social Responsibility. The presentation contains a slide describing Marigold's certification to the ICMC, providing a very high-level overview of the Code and discussing that non-compliance with Marigold's policies and procedures related to cyanide management is grounds for disciplinary action.

Personnel involved with the cyanide offloads are trained on SOP "Escorting and Monitoring the Offloading of Cyanide Deliveries," and all process personnel are trained on SOP "Sodium Cyanide Spills." The protocol for responding to cyanide releases and exposures is for workers witnessing the event to notify EMS via the Mayday Procedure. The auditor interviewed Elisandro Rodriguez, Process Operator, responsible for escorting the cyanide delivery truck, as verification regarding the cyanide training he receives and his understanding of responsibilities associated with spill response.

In accordance with Marigold's standard procedure for responding to cyanide incidents, workers witnessing an incident use the Mayday Procedure to contact EMS.

At the time of this recertification audit, Marigold had approximately 37 Emergency Responders (EMS, Emergency Medical Responder and Coordinators), all of whom are trained to respond to cyanide exposures. Marigold maintains four or five EMS responders on site at any one time.

The Marigold Emergency Response Plan requires all responders to be certified in accordance with state and federal requirements. Marigolds ERT members receive training on SOP "Cyanide Incident First Responder." As outlined on the SOP, the primary training objectives are to ensure that all ERT responders are:

- Properly trained to provide basic first aid for personnel exposed to cyanide;
- Properly trained to administer amyl nitrite;
- Properly trained on the location of the cyanide antidotes;
- Aware of the hazards associated with sodium cyanide and HCN gas;
- Releases; and
- Properly trained in victim and rescuer decontamination procedures.

Additionally, all Marigold process employees receive training on SOP "Cyanide Safety," which includes emergency response, first aid, and medical treatment. Personnel are trained on the locations of the cyanide antidote and procedures for administering Amyl Nitrite. The auditor reviewed personnel files to verify that ERT responders and other workers receive required training.

Marigold has made formalized arrangements with the local hospitals and sent letters regarding the Marigold Mine Cyanide Consumer Notification. Marigold notified the hospitals that it uses sodium cyanide within the hospitals' potential response areas and requested verification that the hospital staff is able to respond to potential cyanide exposures. The letters state that hospitals may be called upon to transport and/or treat the person and informed the hospitals that cyanide antidotes are located at the mine and would be transported with the patient to the hospitals.

Marigold completed the most recent update to its ERP in November 2023 and provided a copy to the LEPC for review and use.

Additionally, Marigold trains with the Valmy Fire Department, with several Marigold ERT employees on the Valmy Fire Department.

Marigold provides periodic refresher training to EMS responders. The auditor reviewed the training file of an Emergency Medical Responder, and verified that he has received regular refresher training over the past three years. Additionally, all Marigold process employees receive training on SOP "Cyanide Safety," which includes emergency response, first aid, and medical treatment.

The "Marigold Cyanide Training" slide presentation covers uses of cyanide at the Marigold operation, cyanide toxicity, HCN gas characteristics and threshold limits, exposure effects, PPE, exposure symptoms, emergency response procedures, first aid treatment and cyanide antidotes (locations, contents, and use), and is included in the Marigold MSHA Annual Refresher Training.

Marigold provided documentation demonstrating that it retains records of the emergency response training provided. The training records for each employee include the name of the trainer, employee name, date of training, and topics covered. In many cases, the record of training history includes a column documenting the "Proficiency" of the trainee and certain cyanide-related SOPs include written exams that employees must pass before performing the tasks (e.g., "Cyanide Safety" and "Sodium Cyanide Spills").

PRINCIPLE 9 – DIALOGUE & DISCLOSURE

Engage in public consultation and disclosure.

Standard of Practice 9.1	**Promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns.**

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 9.1

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 9.1 which requires that the site promote dialog with stakeholders regarding cyanide management and responsibly address identified concerns.

Marigold has developed and implemented a formal stakeholder engagement plan that provides several means for Marigold to provide and stakeholders to communicate issues of concern regarding cyanide use and management at the mine. These include:

- External Events – Marigold periodically hosts and attends local events, whereby Management provides educational presentations regarding the Marigold operation to members of the public.
- Site Tours – Marigold provides site tours for stakeholders by request. Marigold conducted site tours on an as request basis over the period 2021–2024. Participants included BLM representatives, Native American tribe members, Nevada Mining Association members, special interest groups, and general public members. Marigold conducts a general presentation of the mine and its ore processing including the use of cyanide.
- LEPC Meetings – Marigold regularly attends these meetings, which are also attended by the Battle Mountain General Hospital, Battle Mountain Volunteer Fire Department; BLM; EPCRA Facility, Lander County Commissioner's Office, Lander County Community Health, Lander County EMS, Lander County School District, Lander County Search and Rescue, Lander County Sherriff, Lander County Volunteer Fire Department, and other stakeholders.
- Corporate Website – SSR's website provides contact information for the Marigold Mine that allows an individual to contact the company via telephone or email (http://www.ssrmining.com/).

Public Comment – The regulatory process for new permits and permit revisions provides opportunity for public review and comment. The WPCP is modified as needed and each renewal provides a formal opportunity for public comment. As an example, this is what is made public when Marigold request's a new or revised permit: "The Notice of the Division's intent to issue a permit authorizing the facility to construct, operate and close, subject to the conditions within the permit, is being sent to the Great Basin Sun, located in Winnemucca, Nevada for publication. The Notice is being mailed to interested persons on the Bureau of Mining Regulation mailing list." The WPCP has been renewed once since the 2021 ICMC recertification audit. The current permit, effective as of March 1, 2024, is valid until February 28, 2029.

Marigold has several community-focused programs that provide the opportunity to directly interact with Marigold employees. This type of direct interaction also provides an opportunity for community members to discuss any issues of concern they may have about Marigold.

Standard of Practice 9.2	**Make appropriate operational and environmental information regarding cyanide available to stakeholders.**

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 9.2

Summarize the Basis for this Finding or Deficiencies Identified:

The operation is in full compliance with Standard of Practice 9.2 which requires that the site make appropriate operational and environmental information regarding cyanide available to stakeholders.

Marigold has developed and implemented a formal stakeholder engagement plan that provides several means for Marigold to provide and stakeholders to communicate issues of concern regarding cyanide use and management at the mine. Marigold has developed written descriptions (power point presentations) that are presented and made available to stakeholders. These include:

- External Events – Marigold periodically hosts and attends local events, whereby Management provides educational presentations regarding the Marigold operation to members of the public.
- Site Tours – Marigold provides site tours for stakeholders by request. Marigold conducted site tours on an as request basis over the period 2021–2024. Participants included BLM representatives, Native American tribe members, Nevada Mining Association members, special interest groups, and general public members. Marigold conducts a general presentation of the mine and its ore processing including the use of cyanide.

The WPCP Renewal Application and the WPCP Permit Fact Sheet provide descriptions of the "process fluid management" facilities, which include the cyanide facilities. The WPCP is renewed regularly and each renewal provides a formal opportunity for public comment. The current permit, effective as of March 1, 2024, is valid until February 28, 2029.

The SSR Sustainability Reports provide environmental and sustainability information regarding its operations, which are available to the public in both hard copy and electronic format.

Marigold, a signatory company to the ICMC, was initially certified under the Code on January 2, 2007 and subsequently recertified on January 12, 2010, March 20, 2013, February 11, 2016, November 5, 2018, and December 9, 2021. The summary reports for these audits are made available to the public via the ICMC website. The SSR corporate website advertises that Marigold is signatory to the Code and that in 2006, Marigold became the first operating mine in the world certified as fully compliant with the Code.

Marigold has developed a one-hour long video used for all site-specific hazard training provided to contractors. Upon request, the video is made available to the general public for viewing. Additionally, SSR posts a corporate video on its website, which mentions Marigold's ICMC certification (http://www.ssrmining.com/).

Marigold also presents materials in verbal presentation for stakeholder engagement including meetings, site tours, and public comment meetings.

Marigold makes information related to cyanide releases or exposure incidents through the following requirements and programs:

a) Marigold must complete MSHA reports, that are made available to the public, that include any cyanide-related worker exposures which require treatment or result in death (30 CFR Part 50). The Marigold Senior Safety Specialist indicated that no such incidents requiring hospitalization or a fatality related to cyanide have occurred at the Marigold Mine over the three-year period between the 2021 ICMC recertification audit and this recertification audit.
b) The WPCP provides reporting requirements for spills and releases and Section 9.3 of the WPCP Renewal Application describes notification requirements. In accordance with the WPCP Renewal Application, depending upon the magnitude and type of spill, notification of one or all of the following agencies is required: 1) NDEP & BLM; 2) Nevada Division of Emergency Management (Notification under CERCLA); and 3) National Response Center (Notification under Section 304 of the Community Right to Know Act). The application provides specific notification requirements, procedures, and contact information for each agency. Additionally, as stated in the WPCP application under Section 304 of the Community Right to Know Act, Marigold must report to the State and LEPC releases involving over 10 pounds of cyanide, or of reportable quantities of other hazardous substances, beyond the facility boundary that may potentially result in exposure to individuals outside of the facility boundary. Notification procedures for such a release are provided and these reports become public records.

Additionally, Marigold conducts quarterly and annual reporting as set forth in the WPCP, which includes a summary of cyanide spills and releases. Quarterly reports are submitted to NDEP by the 28th of the month following the quarter. Spills occurring within the operating boundary and below the reportable quantities are contained, characterized, mitigated, and recorded. Quarterly reports include results of monitoring and inspections as well as a summary of minor reportable spills that occurred within the quarter.

Spills exceeding the reportable quantity are reported within specified regulatory timeframes to the appropriate agencies. The reports include period and location of release, agencies notified by phone (when applicable), material release and concentration, quantity release, incident description, and remedial action and cleanup activities. The NDEP reports are available to the public.

The Marigold Environmental Specialist indicated that no cyanide releases off the mine site requiring response or remediation have occurred at the Marigold Mine over the three-year period between the 2021 ICMC recertification audit and this recertification audit.

a) Marigold has not experienced any significant cyanide releases on or off the mine site resulting in significant adverse effects to health or the environment during the three-year period between the 2021 ICMC audit and this recertification audit.
b) Marigold has experienced onsite cyanide releases that include: several minor cyanide releases, three moderate cyanide releases, and no significant cyanide releases. Marigold has not experienced a release off the mine site. Marigold is required to report all cyanide releasees to the NDEP in accordance with their WPCP. The three moderate releases were reported to NDEP, materials removed to the heap leach pad and excavation to dry soils and/or confirmatory sampling completed.

   All releases have been reported to NDEP as required during the three-year period between the 2021 ICMC audit and this recertification audit.
c) Marigold has not experienced any significant cyanide releases that have caused applicable limits for cyanide to be exceeded during the three-year period between the 2021 ICMC audit and this recertification audit.