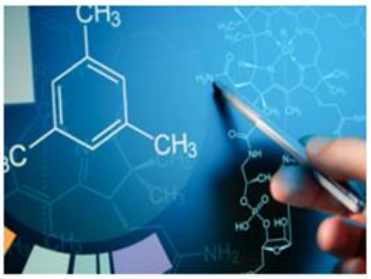
ICMI Mining Operations Verification Protocol (Revision June 2021)

Summary Audit Report

Nevada Gold Mines LLC

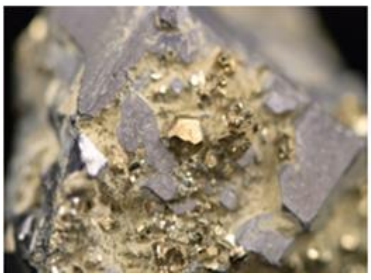
Carlin Process Complex – Gold Quarry

2023 Re-Certification Audit








Carlin Complex – Gold Quarry

Submitted to:

The International Cyanide Management Institute
1400 I Street, NW – Suite 550
Washington, DC 20005
USA

MSS®
Code Certification Service

www.mss-team.com

Table of Contents

Operation General Information

Name and location of Mine:	Nevada Gold Mines LLC – Carlin Process Complex – Gold Quarry 1655 Mountain City Highway Elko, NV 89801
Name of Mine Owner / Operator:	Nevada Gold Mines LLC
Name of Responsible Manager:	Gavin Ferguson General Manager – Carlin Email: gavin.ferguson@nevadagoldmines.com

Location Detail and Operation Description

The Carlin Process Complex – Gold Quarry (GQ) is owned and operated by Nevada Gold Mines LLC (NGM), which is a joint venture between Barrick Gold and Newmont that formed July 1, 2019. GQ consists of several mining operations. The mining operations within GQ that have cyanide facilities and that are included in this Recertification Audit are the Gold Quarry Mine, North Area Leach (NAL), South Area Leach (SAL), and the Emigrant Mine. The only cyanide-related change that was processed during the re-certification period was the change of amyl nitrate and Cyanokit to just Cyanokit for treating cyanide exposure. This change was appropriately processed through the Management of Change (MOC) process and is discussed later in this report.

GQ is in north-central Eureka County, Nevada, between 6 and 21 miles north of the town of Carlin and 35 to 40 miles west of Elko. Mining originally began in 1965 in the GQ open pits, and then extended to underground mining in 1994. GQ is separated into the North and South Areas, which are connected by a haul road and a public highway. GQ only receives liquid cyanide in tanker trucks.

The South Area is in Eureka County, Nevada and consists of the following active facilities:

- Gold Quarry open pit
- Mill 5 includes the reagent building, two carbon-in-leach (CIL) circuits – one for ore from Mill 5 and one for ore from Mill 6, process laboratory, magnetic separator, carbon stripping circuit, and carbon regeneration kilns
- Mill 6 includes the double rotating mill and roasters
- Mill 5/6 Central, West, and East Tailings Storage Facilities (TSF) and associated tailings and reclaim pipelines
- Tailings Booster Pump Houses #1 and #2
- Caros Acid Plant (located at the Tailings Booster Pump House #1)

- Dry Stack TSF (for tailings relocated from the James Creek TSF due to pit expansion)
- Refinery
- Metallurgical and assay laboratories
- South Area Leach (SAL) Facility includes the Property Heap Leach Pad and Non-Property Heap Leach Pad, carbon-in-column (CIC) plant, process laboratory, ponds, and pipelines
- Overburden piles, topsoil stockpiles, access roads, and haul roads
- Support facilities such as warehouses, administration buildings, truck shops, maintenance shops, and fueling facilities

The South Area includes the following inactive or closed facilities:

- Chukar underground mine (closed December 2020)
- James Creek TSF (inactive and draining down, but used occasionally for upset conditions from the Tailings Booster Pump House #1)
- Gold Quarry Leach Facility (closed)
- Commercial Refractory Leach Facility (closed)

Mill 5 is a pyrite floatation plant that processes sulfide and oxide ores that are ground in a semi-autogenous grinding (SAG) mill and ball mills. The material is then sent to the floatation circuit where the sulfides are floated and dried for later processing in an autoclave or roaster. The oxide material remaining after floatation is sent to a set of CIL tanks for gold recovery. Mill 5 (SAG mill, flotation circuit, and CIL circuit) was in operation during much of the 2023 recertification period; however, the SAG mill and flotation circuit were shut down during the field portion of the 2023 Recertification Audit and not all of the Mill 5 CIL tanks were in use.

Mill 6 consists of a double rotating mill and roaster. Sulfide material is fed to the roaster where the sulfides are volatilized. The ore leaving the roasters is sent to a second set of CIL tanks at Mill 5 for processing. Tailings from both CIL circuits are combined and sent through a Caros Acid cyanide destruction circuit before disposal in the Mill 5/6 TSF.

Gold-bearing solution from the SAL Property and Non-Property heap leach pads drains to a series of pregnant ponds. Solution from the pregnant ponds is pumped via pipeline to two parallel CIC circuits at SAL CIC plant. Loaded carbon is transferred from the SAL CIC plant to the carbon handling facility and refinery for further processing.

The North Area is in Eureka County, Nevada and consists of the following active facilities:

- East Carlin, Gold Quarry, Blue Star, and Silver Star open pit mines
- Leeville, Pete Bajo, and Exodus underground mines
- North Area Leach (NAL) processing area includes the heap leach pad, CIC plant, process laboratory, ponds, and pipelines
- Leeville Water Treatment Plant
- Overburden piles, topsoil stockpiles, access roads, and haul roads
- Support facilities such as warehouses, administration buildings, truck shops, maintenance shops,

and fueling facilities

The North Area includes the following inactive or closed facilities:

- Chukar underground mine (closed December 2020)
- Mill 4/2 TSF (inactive and draining down)
- Post 1 Leach Pad (inactive and draining down)

The processes at the North Area include a heap leach pad and CIC plant. The gold-bearing solution from the NAL heap leach pad drains to a series of pregnant ponds. Solution from the pregnant ponds is pumped via pipeline to the two parallel CIC circuits at the NAL CIC plant. Loaded carbon is transferred to the carbon handling facility and refinery at the South Area for further processing.

The Emigrant Mine, also part of Gold Quarry, is in southwest Elko County, Nevada, approximately 12 miles south of the town of Carlin and approximately 35 miles west of Elko. The mine is located on the eastern slopes of the Piñon Range in the Dixie Creek Basin and processing facilities are located at elevations ranging from approximately 5,700 to 6,600 feet above mean sea level. Mining began in 2012.

The Emigrant Mine consists of an open pit mine, heap leach pad, a CIC process building, a pregnant solution tank, two pregnant solution process ponds, a stormwater pond, solution collection and conveyance pipelines, waste rock storage facilities, stormwater diversion channels, and support facilities.

Run of mine ore was mined and hauled from the open pit and placed on the heap leach pad in previous years. At the time of the audit, NGM was not actively mining the open pit. Operations at the heap leach pad and the CIC process building are active. A dilute sodium cyanide solution is applied to the ore on the heap leach pad through a system of pipes and drip emitters. This process solution dissolves the gold in the ore. The gold bearing solution, now called pregnant solution, is conveyed through solution collection pipes located at the base of the pad to the solution collection sump. From this location, pregnant solution may be directed to the CIC process, to the pregnant solution tank, or either of the two pregnant solution ponds. Solution collected in the tank or ponds is recovered and pumped to the CIC circuit to remove the gold from the solution and adsorb it to the activated carbon. The carbon is sent offsite to the refinery at the Gold Quarry Mine to be stripped of the gold, regenerated, and then returned to the Emigrant CIC process. The carbon is regenerated in a kiln and the recovered gold doré is sent off site for further processing. Once the process solution passes through the CIC circuit, it is called barren solution because it no longer contains high quantities of gold. Sodium cyanide is added to the barren solution and returned to the leach pad to repeat the leaching process.

Figure 1. Regional Map

Audit Implementation and Conclusions

This re-certification audit was conducted through on-site observations; reviews of records and procedures; and interviews with senior management, operations management, operators, maintenance personnel, engineering, and environmental, health & safety (EH&S) staff. The audit team used the 2021 International Cyanide Management Institute (*ICMI) Mining Operations Verification Protocol* to evaluate International Cyanide Management Code (Cyanide Code) compliance.

Procedures, site conditions, and records were evaluated during this audit. The assessment was based on random samples of information and therefore deficiencies may exist which have not been identified. The depth to which records and data were sampled was typical of an environmental, health and safety (EH&S) management system audit. Although legally required records were sampled to evaluate Cyanide Code compliance, legal compliance with federal, regional, and local regulations was not part of the scope of this evaluation.

The audit was performed by an independent third-party audit team that fulfills all ICMI Cyanide Code Lead Auditor and Technical Auditor requirements for cyanide mining operations.

The most recent recertification of this operation was at the end of 2021. NGM recertified this operation concurrently with the Goldstrike operation this year to improve alignment between the two operations. Many NGM resources and processes are leveraged across both GQ and Goldstrike. The recertification audit

strategy was deemed to be highly effective by the audit team and NGM stakeholders.

All aspects of the cyanide operations were included in this Cyanide Code Re-Certification Audit. The operation was found to be in FULL COMPLIANCE with ICMI Cyanide Code Mining Operations requirements.

Auditor's Finding

This operation is in **FULL COMPLIANCE** with the International Cyanide Management Code.

Compliance Statement

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

Auditor Information

Audit Company:	MSS Code Certification Service, a division of: Management System Solutions, Inc. www.mss-team.com
Lead Auditor:	Nicole Jurczyk E-mail: njurczyk@mss-team.com
Technical Auditor:	Gina Rau
Dates of Audit:	May 15 – 18, 2023

Auditor Attestation

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

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

NGM Carlin Process Complex – Gold Quarry		August 15, 2023
Name of Operation	Lead & Technical Auditor Signatures	Date

NGM Carlin Process Complex – Gold Quarry		December 26, 2023
Name of Operation	Signature of Lead Auditor	Date

Principles and Standards of Practice – Mining Operations Verification Protocol

Principle 1 | PRODUCTION AND PURCHASE

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

Standard of Practice 1.1 Purchase cyanide from certified manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide and to prevent releases of cyanide to the environment.		
Nevada Gold Mines (NGM) – Gold Quarry (GQ) purchased sodium cyanide 30% aqueous solution from the Cyanco Company, LLC (Cyanco) during the term of the 2023 Recertification Audit period – June 2021 through April 2023. During the term of the 2023 Recertification Audit period, one purchasing agreement was in effect. The Master Supply Agreement #4600001462 between NGM and Cyanco became effective on January 4, 2021, and has an end date of December 31, 2025. The Carlin Complex is listed in Supply Agreement #4600001462. Based on review of a representative sample of Bills of Lading (BOLs) and interviews with GQ operations personnel, GQ has purchased cyanide solely from the Cyanco Winnemucca cyanide production plant during the 2023 Recertification Audit period. Cyanco is a signatory to the Code and has been recertified as compliant under the Code. The Cyanco Winnemucca plant was certified originally as Code compliant on October 11, 2006, and was most recently certified on January 13, 2023.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 1.1

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.
Based on review of a representative sample of BOLs, GQ maintains the BOLs for cyanide delivered to GQ during the 2023 Recertification Audit period. The BOLs clearly identify that cyanide was obtained from the Cyanco Winnemucca, NV production plant and transported by TransWood to the GQ cyanide storage facilities located at each Operating Area: South Area Leach (SAL), North Area Leach (NAL), Emigrant, and GQ South Mill 5. TransWood was the only carrier transporting cyanide from the Cyanco Winnemucca Production Plant to GQ during the recertification period. TransWood, Inc. was certified as fully compliant with the Code on October 11, 2006 and was last recertified to the Code on November 30, 2022
The operation is: ☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with — Standard of Practice 2.1

Principle 3 | HANDLING AND STORAGE

Protect workers and the environment during cyanide handling and storage.

Standard of Practice 3.1
Design and construct unloading, storage and mixing facilities consistent with sound, accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.
GQ has designed and constructed the cyanide unloading and storage facilities in each Operating Area in accordance with sound engineering practices. Auditors observed the cyanide unloading and storage facilities listed below and found them to be in good condition: • Mill 5: two 20,000-gallon tanks located inside the Mill 5 Reagent Building • NAL: one 13,000-gallon tank located outdoors in a secondary containment area • SAL: one 13,000-gallon tank located outdoors in a secondary containment area

- SAL Non-Property Phase I Pregnant Pond: two 11,000-gallon tanks located outdoors. These tanks were emptied and not in use during the recertification period; therefore, these tanks are not included in the Standard of Practices below.
- Emigrant: two 17,800-gallon tanks located outdoors in a single secondary containment area

GQ has constructed fences with locked gates around, or other means, to restrict access to the cyanide unloading and storage areas in each Operating Area. The fences and restricted access prevent entry by unauthorized personnel. No towns or houses are in the vicinity of the GQ cyanide facilities. Places where workers may congregate are located away from the cyanide unloading areas and storage tanks.

The Mill 5, NAL, and Emigrant cyanide storage tanks and unloading areas are located away from surface water bodies. The nearest surface water bodies to the SAL cyanide unloading area and storage tank is Maggie Creek, which is approximately 0.7 miles away and on the other side of Highway 766. Measures that prevent cyanide releases to Maggie Creek include the distance to Maggie Creek, an elevated highway is located between the tank and Maggie Creek, and the tank's secondary containment drains into the Preg pond.

GQ has not made any changes to the cyanide unloading areas during the recertification period. Auditors observed that cyanide unloading occurs on concrete pads designed to minimize seepage to the subsurface at each Operating Area. These pads are constructed of cast-in-place reinforced concrete. Each pad is sloped either to a collection sump that transfers any spillage back to the process or to piping that collects and transfers any spillage to an adjacent process pond. The construction of the unloading pads provides for the containment, recovery, and remediation of any leakage from the cyanide delivery process. The concrete pads and collection sumps/piping were observed to be in good condition during the recertification audit.

GQ uses level indicators, high level alarms, and procedural controls to ensure that the cyanide storage tanks are not overfilled. The six cyanide storage tanks in use are equipped with ultrasonic level indicators to prevent overfilling. The level indicator readings are tied to a PLC and can be viewed at the unloading point and on operating screens in the Crusher Control Room for the NAL, SAL, and Emigrant cyanide storage tanks and the Mill 5 Control Room for the Mill 5 cyanide storage tanks. The auditors observed tank levels at the storage tank areas and control room screens to verify the indicators were functioning. The tanks are equipped with audible and visual high-level alarms in the Mill 5 Reagent Building and at the tanks for the other Operating Areas. The reliability and functionality of the cyanide storage tank levels is verified through checks of tank levels during daily inspections and checks during offloading.

The GQ cyanide storage tanks are located on raised concrete platforms within concrete secondary containment areas that prevent any seepage to the subsurface. The containment areas are constructed of concrete slabs with concrete walls and are dedicated solely to cyanide storage. They are either equipped with sumps, pumps and automated controls that return any collected liquids to the process circuits or drain to process ponds. The secondary containment areas separate the cyanide from, and prevent mixing

with, incompatible materials, food, animal feeds, tobacco products, and other chemicals storage areas. The auditors did not observe other chemicals, food, animal feed, or tobacco products being stored in the cyanide storage tank secondary containment areas and the secondary containment areas were observed to be in good condition. No changes or modifications have been made to the storage tank containment areas during the recertification period, except that the SAL secondary containment area was recoated with an epoxy coating during the recertification period.

The SAL, NAL, and Emigrant cyanide storage tanks are located outdoors. Natural ventilation will prevent build-up of hydrogen cyanide (HCN) gas. The Mill 5 cyanide storage tanks are located within the Mill 5 Reagent Building, which is equipped with an exhaust fan and a large roll-up door to the outside that allow for adequate ventilation to prevent the build-up of HCN gas.

The cyanide storage tanks in each Operating Area are located within secure areas where public access is prohibited. In addition, security check-in points and video surveillance are also provided.

GQ only receives liquid sodium cyanide solution and therefore, does not have cyanide mixing facilities for solid cyanide.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 3.1

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.

GQ only receives liquid cyanide in tanker trucks. The transporter (TransWood) driver offloads the cyanide from the tanker trucks into GQ's cyanide storage tanks and then returns the truck to the cyanide supplier (Cyanco). The tanker trucks are not left at GQ and GQ cannot reuse the tanker trucks for any other purpose. Cyanide drums, bags, containers, or liners are not used at the GQ Operating Areas. The auditors did not observe any cyanide drums, bags, containers, or liners on site.

Operations personnel conduct a *Monthly Cyanide Inspection* that includes inspection of piping, valves, and couplings. If personnel note that maintenance is required, they will either complete repairs at the time of the inspection or enter a work order into the maintenance system. The TransWood driver is responsible for inspecting their cyanide tanker and equipment, including shutoff valves and hoses, uncapping the quick-release coupling on the cyanide storage tank feed line, connecting the hose, opening, and closing the valves on the feed line, and cleaning any cyanide residue present on the tanker truck valves, hoses, and connections. Once the driver has closed the valves, disconnected the transfer hose, cleaned the area

of any cyanide residues, and provided an 'all clear' to the operator, the operator inspects the unloading area to ensure that residues/accumulations have been cleaned. The *Cyanide Off-loading Standard Operating Procedure (SOP)* requires the GQ operator to verify that drips or spills have been cleaned up before removing the barricades and signing the Bill of Lading.

GQ has developed and implemented cyanide offloading procedures and checklists for Mill 5 and for the heap leach facilities that are structured to prevent exposures and releases during unloading of liquid cyanide. Cyanide unloading occurs outdoors to prevent exposures to any HCN that may be present during the unloading event.

GQ requires a Safety Buddy to verify that the delivery driver is wearing the required PPE and that PPE is readily available for the Safety Buddy in the event of an emergency. The GQ Safety Buddy is present when the delivery driver connects and disconnects the transfer hose and then remains present during the transfer if the unloading area is not equipped with remote monitoring via a camera system, or the camera system is not operational, or the control room operator is not available to monitor the offloading. The auditors observed a cyanide unloading event at Emigrant and interviewed both the CIC Plant Operator and the TransWood delivery truck driver. Both demonstrated a thorough understanding of the requirements to perform cyanide unloading, how to prevent and contain releases, and how to prevent or respond to a worker exposure.

GQ only receives liquid cyanide solution that has had the colorant dye added by Cyanco at their Winnemucca production facility.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 3.2

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.

GQ has developed written management plans, manuals, and standard operating procedures (SOPs) for their cyanide facilities. The SOPs cover the safe operation of GQ's cyanide facilities including details for completing specific tasks.

GQ has obtained four Water Pollution Control Permits (WPCPs) that authorize the construction, operation,

and closure of the cyanide facilities at the GQ Operating Areas. The WPCPs specify the regulatory requirements for cyanide process solution management and monitoring/sampling of process solution, surface water, and groundwater. A Fluid Management Plan associated with each WPCP has been developed. These plans describe the operating requirements contained in the WPCPs and identify contingency measures to address upsets in the facility's water balance.

In addition to the SOPs, WPCPs, and plans, GQ obtained four Industrial Artificial Pond Permits (IAPP) that stipulate operating requirements for GQ's ponds and list the measures that GQ must take to prevent wildlife from gaining access to their ponds. To verify compliance, the auditors reviewed the Fluid Management Plans and several SOPs, interviewed operations personnel, and completed a site inspection for evidence of implementation.

GQ has developed and implemented inspection and preventive maintenance (PM) programs which include practices for safe and environmentally sound operation of their cyanide facilities. GQ uses a computer-based system for identifying, assigning responsibility, scheduling, and tracking the completion of preventive maintenance activities. The system identifies future activities for regular preventive maintenance and includes information on the task requirements and completion. The PM program includes elements necessary for cyanide safety and process equipment, including weekly inspection of pumps, lines, and joints for cyanide salts and monthly cyanide instrument and HCN sensor calibration PM. The audit included a review of completed cyanide-related preventive maintenance work orders for the recertification period. Review of the work orders and forms indicates that GQ maintenance personnel are documenting their preventive maintenance activities.

Mill 5, Tails, and CIC Plant operators conduct inspections of the cyanide facilities at various intervals. Weekly and monthly inspections are required by the WPCPs/Fluid Management Plans. These inspections include, but are not limited to, observations of the Mill 5/6 Tailings Storage Facility (TSF) and its embankments, operation of the cyanide destruct system, process pond levels, pump operation, cyanide levels in process and pond solutions, cyanide storage tanks and containment areas, and emergency response equipment.

GQ documents their inspections on checklists, log sheets, and specific inspection forms. The checklists, logs, and forms included the items the inspectors are to observe, the date of inspection, the name of the inspector, and space for personnel to note deficiencies or problems observed during the inspection. If issues observed cannot be corrected at the time of the inspection, work orders are generated for repairs and maintenance. The auditors reviewed a sampling of completed inspection records for the recertification period and confirmed that the records fulfilled the Code requirements and have been retained for the recertification period.

The general condition of the cyanide storage and process (CIL and CIC) tanks are inspected each shift and on a monthly basis. Wall thickness testing is completed on the cyanide storage tanks on an annual basis. Test results in the 2022 Ultrasonic Inspection Report show that the shell thickness readings on the cyanide

storage tanks remain within the acceptable range.

Secondary containment areas for tanks and pipelines are inspected each shift and on a monthly basis. Inspections include visual evaluation of the containments for cracks, presence of debris and fluids, locked valves, and proper functioning of the sump and pump if equipped. GQ operators inspect the leak detection sumps for the heap leach pad operations on a weekly basis in accordance with GQ's WPCPs.

Wall thickness testing is completed annually on the cyanide lines at SAL, NAL, Emigrant, and Mill 5 cyanide, including the tank fill, recirculation, overflow, and transfer lines; sump pump recirculation, suction, and transfer lines; and lines in the loaded carbon building. Cyanide lines are routinely inspected visually by operators when completing their shift inspections. In addition, operations personnel conduct a *Monthly Cyanide Inspection* that includes inspection of piping, pumps, and valves for signs of deterioration, crust buildup, corrosion, leakage and excessive heat, noises, or vibrations in the pumps. If personnel note that maintenance is required, they will either complete repairs at the time of the inspection or enter a work order into the maintenance system.

Based on review of a representative sampling of inspection records, the auditors observed that GQ inspects its cyanide facilities on an established frequency that is sufficient to ensure they are functioning within design parameters.

GQ has not modified their emergency power resources since the last recertification audit. Each GQ Operating Area has emergency power generation capabilities to operate critical cyanide equipment in the event of a power outage to prevent cyanide releases. SOPs have been developed to guide operators and electricians when switching from line power to generator power in the event of a power failure. The generators are tested/operated once per month and generator inspections are performed quarterly by maintenance personnel. A third-party contractor performs an annual service that includes operating the generators under full load.

GQ maintains a documented Management of Change (MOC) process and MOC database to ensure that proposed changes to production processes, operating practices, and cyanide facilities are thoroughly reviewed prior to making changes. The system includes the identification of risks and stakeholders, the development of an implementation plan, and requires authorizations from various departments, including the environmental and safety departments, and follow-up actions.

The MOC process requires necessary personnel, including the environmental and safety department, to review proposed process changes or changes in operating practices that may increase the potential for cyanide releases and worker exposures. Environmental and Safety personnel are required to approve any change involving cyanide. Risk control measures are also identified and implemented to protect worker health, safety, and the environment.

The only cyanide-related change that was processed during the re-certification period was the change of amyl nitrate and Cyanokit to just Cyanokit for treating cyanide exposure. The MOC was dated March 9, 2022. A risk assessment of the change was performed, and the change was approved by Safety and Health

personnel. Non-cyanide-related changes were viewed in the Change Management application as evidence that GQ continues to maintain its MOC system.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 4.1

Standard of Practice 4.2

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

GQ has implemented a program for determining the appropriate cyanide addition rates in the Mill 5 CIL trains and Mill 6 CIL trains to maximize gold recovery, but also to minimize cyanide usage. The Metallurgists review cyanide concentration and ore chemistry data and provide a targeted free cyanide concentration, in pounds per ton, to the Mill 5 Control Room Operator.

To determine if the actual cyanide concentration matches the targeted cyanide concentration, operators sample the ore slurry in the Mill 5 and Mill 6 CIL trains in multiple locations at least twice per shift. Operators perform cyanide titrations to determine the cyanide concentration in the samples and then provide the results to the Mill 5 Control Room Operator who adjusts the setpoint for the cyanide addition rate based on the operator's titration results.

In addition to meeting targeted cyanide concentrations in the CIL circuits, operators also target a cyanide concentration in the tails prior to the cyanide destruction process so that the cyanide can be effectively reduced in the cyanide destruction process prior to discharge to the Mill 5/6 TSF.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 4.2

Standard of Practice 4.3

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

GQ has developed four GoldSim water balance models, one for each Operating Area (NAL, SAL, Emigrant, and Mill 5/6). These models were in use at the time of the previous recertification audit. The GoldSim models are both comprehensive and probabilistic. They are comprehensive in that they include the appropriate facilities and processes. The models are probabilistic in that inputs and outputs are distributions rather than single values (deterministic). The SAL, NAL, and Emigrant models include the heap leach pads, process solution and event ponds, and associated CIC Plant operation. The Mill 5/6 model includes the TSF and the Mill 5 and 6 CIL circuits.

Each model includes inputs and outflows that are area specific. The water balance models for SAL, NAL, and Emigrant include the barren solution application rate applied to the heap leach pad. The Mill 5/6 TSF water balance model includes solids deposition in the TSF by allowing values to be entered for tons of ore from Mills 5 and 6 to the TSF. The water balance models have been developed to evaluate the effects of storm events. The GoldSim models include solution losses due to evaporation, saturation of ore added to the heap leach pads, and entrainment in tails solids deposited in the Mill 5/6 TSF. GQ does not discharge process solutions containing cyanide to surface waters or groundwater. Given that the heap leach pads, process ponds, and the Mill 5/6 TSF are configured as elevated features or surrounded by diversion ditches, run-on does not occur and is not an input to the four models.

Met stations are located at Emigrant, Gold Quarry (SAL/Mill 5/6), and NAL. Precipitation data from each met station is used when the water balance model for an Operating Area is updated. Evaporation rates are based on pan evaporation rates representative for the local area.

The ponds and impoundments are designed and operated to comply with the Nevada Department of Environmental Protection (NDEP) and Nevada State Engineer requirements as described in the four Fluid Management Plans. Freeboard requirements are regulated and specified in GQ's four WPCPs. Operations personnel make adjustments as needed to maintain the required freeboard in the process solution ponds and Mill 5/6 TSF based on current operations.

GQ inspects process ponds and event ponds twice daily to ensure that facilities are being operated in conformance with the WPCP requirements. Telemetry is used to measure levels in the process solution ponds at NAL and SAL. These readings appear on the Crusher Control Room screen and are monitored by the Control Room Operator. Measurements of the process pond levels at Emigrant are manually taken and recorded. These measurements are entered into GQ's process data control system and can be viewed in the system. Based on review of pond level measurements, the process solution ponds are being operated to maintain the freeboards required by the WPCPs.

GQ's SOPs address ponding on the heap leach pads, operation of the leak detection systems, and include procedures to maintain preg pond levels. In addition, the process pond levels at SAL, NAL, and Emigrant are inspected two times each day and recorded on operator report forms or checklists.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 4.3

Standard of Practice 4.4

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

The operation demonstrated through Weak Acid Dissociated (WAD) cyanide testing that WAD cyanide concentrations did not exceed 50 milligrams per liter (mg/L) in open waters during the recertification period. Open waters include liquids that may be present at the heap leach facilities (pregnant solution ponds, stormwater event ponds, and ponding on the heap leach pads) and the Mill 5/6 TSF. The operation has implemented measures to restrict access by wildlife and livestock to open waters including lining the mine perimeter with barbed-wire fencing, installing chain-link fences around the process ponds and CIC circuits at SAL and NAL, keeping stormwater event ponds dry, except during wet climatic conditions, surrounding the Emigrant CIC process building and ponds with a chain link fence with a tighter weave at the bottom, and connecting heap leach pads, ponds, and CIC process areas and buildings via pipelines, rather than open channels. The Mill 5/6 TSF is also equipped with a hazing system consisting of propane cannons that is routinely inspected by TSF operators.

Based on a review of results in the quarterly WPCP reports, the Weak Acid Dissociable (WAD) cyanide concentrations were 31 mg/L or less in the tailings water entering the Mill 5/6 TSF. This sample is collected quarterly from the spigots as the water enters the TSF. Since the tailings water entering the Mill 5/6 TSF and the reclaim water leaving the TSF are both less than 50 mg/l, then the water in the supernatant both at the point of discharge and in the pool is less than 50 mg/l. A representative sampling of Tails Operator Reports and quarterly WPCP reports from the recertification period demonstrated the cyanide concentration in samples collected two times per day from the spigots into the Mill 5/6 TSF and the reclaim sumps are below 15 mg/L.

During the recertification period, GQ maintained WAD cyanide levels below 50 mg/L in the open waters in their preg ponds. This is based on graphs displaying the WAD cyanide results from daily samples included in the quarterly Wildlife Mortality Reports.

The WAD cyanide in barren solutions applied to the heap leach pads in the SAL, NAL, and Emigrant operating areas are typically greater than 50 mg/L; however, GQ has implemented measures to minimize ponding on the heap leach pads and take immediate corrective measures when ponding is observed. GQ applies barren solution to its heap leach pads through a drip system where the cyanide solution drips out of the drip lines and soaks into the ore. Cyanide solution is not sprayed on to the ore on the heap leach pads; therefore, overspray of solution off the pad liner does not occur.

GQ's Leach Pad Ponding SOP defines three levels for the presence of solution on the surface of the leach pads ranging from puddles to significant ponding. Each level has prescribed measures that operators are to take to mitigate the ponding.

Between applying the barren solution in this manner and implementation of the Leach Pad Ponding SOP, GQ applies leach solutions in a manner that avoids significant ponding on the heap leach pads. Minimal ponding was observed on the NAL, SAL, and Emigrant heap leach pads during the field portion of the 2023 Recertification Audit.

GQ personnel are required to report all wildlife mortalities to the Carlin Complex's Environmental Team.

The Environmental Team submits a quarterly report to the Nevada Department of Wildlife (NDOW) that lists all wildlife mortalities and the suspected cause of death that may occur in each Operating Area. A review of nine quarterly wildlife reports submitted to NDOW during the recertification period showed one solution related death of a red-tailed hawk; however, it was not cyanide-related. Based on the review of reported mortalities, GQ's efforts to maintain a WAD cyanide concentration of 50 mg/L or less in open waters has been effective in preventing significant wildlife mortalities.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 4.4

Standard of Practice 4.5

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

Based on review of analytical results for groundwater monitoring wells located around the Operating Areas contained in the annual WPCP reports, interviews, and observations during the audit, the GQ Operating Areas do not have direct or indirect discharges of cyanide solutions to surface waters and operate with zero discharge of process solutions.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 4.5

Standard of Practice 4.6

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

GQ has implemented measures to protect groundwater beneath and immediately down-gradient of the operation. GQ installed and samples groundwater monitoring wells and reviews the analytical data to detect if cyanide seepage occurs. GQ submits the data to NDEP on a quarterly basis.

GQ's cyanide facilities were designed as zero discharge to both surface water and groundwater and were constructed with impermeable containment systems or liners to prevent seepage. Many of the requirements, along with requirements for operating the facilities, are included in GQ's WPCPs. In accordance with these permits, GQ implements inspection and monitoring programs to ensure water

management and leak detection systems are functioning properly, and that water quality is being protected.

GQ has not modified their groundwater protection measures since previous recertification audits. Protective measures include such items as locating processing circuits either within process buildings with concrete floors and stemwalls or on peripheral bermed or walled concrete containment with collection sumps to provide required secondary containment; locating single-walled pipelines above concrete containment; providing buried pipelines with dual containment; locating tailings and reclaim pipelines within either HDPE lined channels or concrete vaults/containment areas; constructing heap leach pads with geotextile, drainage, and HDPE layers, underdrain solution collection piping, compacted clay, and compacted subgrade; and constructing stormwater ponds with a HDPE liner on compacted subgrade.

In accordance with their WPCPs, GQ's Operating Areas are required to conduct quarterly sampling of groundwater monitoring wells located downgradient of the process facilities and in other various locations around the Operating Areas. Samples are collected from the wells and analyzed for a defined list of parameters, including WAD cyanide. Review of the past five years of data in GQ's annual Water Monitoring Reports for their four WPCPs indicate no detectable WAD cyanide (i.e., <0.01 mg/L) in the groundwater at the compliance points below and down-gradient of the operation during that period. The Nevada Groundwater Standard for WAD cyanide is 0.2 mg/L, which is based on the federal drinking water standards.

The Leeville Underground Mine, which is part of the Carlin Complex, uses tailings from the old Mill 4/2 TSF, which is no longer used for tailings deposition, to make paste backfill. As required by their WPCP, GQ tests for WAD cyanide on the tailings solids removed from the Mill 4/2 TSF and stockpiled for use in paste backfill and conducts a Meteoric Water Mobility Procedure on the tailings solids and tests for WAD cyanide in the leachate produced on a quarterly basis. Results in the quarterly WPCP reports indicate that the WAD cyanide levels in the tailings solids leachate were either non-detect or well below the groundwater standard of 0.2 mg/L WAD cyanide. As noted in the previous recertification audit report, the Nevada Division of Environmental Protection (NDEP) approved a reduced sampling frequency for the tailings solids leachate since the cyanide were so low and as such, no extra measures were required to protect worker health or groundwater.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 4.6

Standard of Practice 4.7

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

GQ has installed spill prevention and containment measures for the cyanide-related storage and process tanks and vessels at Mill 5/6, NAL, SAL, and Emigrant. The auditors observed these containments to be in good condition and suitable for use during the field portion of the 2023 Recertification Audit. No changes or modifications have been made to the secondary containments for cyanide unloading, storage tanks, process tanks, and CIC circuits during the 2023 recertification period. The secondary containments for cyanide tanks are sized to contain a volume greater than that of the largest tank located within the containment and any piping draining back to the tank plus the design storm event.

Spill prevention or containment measures for the cyanide facilities include such items as locating processing components within process buildings that have concrete floors and stemwalls or on a peripheral bermed or walled concrete containment with collection sumps; locating cyanide storage tanks, barren solution pumping stations, and CIC circuits within concrete containment areas that are constructed over HDPE liners placed below grade that report to the solution pond system or return collected solutions to the process circuit; constructing containments of cast-in-place reinforced concrete; equipping secondary containment structures with collection sumps with automated pumps to transfer any cyanide solution to the process circuit or sloping them so collected fluids drain to a process solution pond.

GQ has provided secondary containment for cyanide process tanks. The Mill 5 thickener is not provided with secondary containment. A spill from the Mill 5 Thickener would run over pavement to the concrete Mill 5 Emergency Catch Pond. If the spill exceeded the capacity of this catch pond, the spill would be discharged via an overflow pipe to a clay-lined Sediment Control Basin located immediately downstream. The capacity of the Mill 5 Emergency Catch Pond (44,115 ft3) is insufficient to contain the entire volume of the thickener (147,300 ft3) and therefore a major spill would report to the Sediment Control Basin (282,000 ft3). In the event of a spill reaching the clay-lined Sediment Control Basin, GQ would use guzzler trucks, gas powered pumps, loaders, track hoes and backhoes as necessary. Contaminated soils would be excavated and placed on the leach pads or back into the process circuit. However, the Mill 5 process had been shutdown and was not operational during the 2023 Recertification Audit.

GQ has constructed cyanide-containing pipelines with spill prevention and/or containment measures to collect leaks and prevent releases. Auditors observed the pipeline containments in a number of locations and observed them to be in good condition during the 2023 Recertification Audit. Pipelines for Mill 5/6 are either double-walled (i.e., pipe-in-pipe), placed within geomembrane or HDPE-lined ditch, located above concrete secondary containment areas for storage or process tanks, and/or equipped with flow deviation sensors and pressure sensors with alarms. Alarms are monitored at the Mill 5 control room.

The piping for the heap leach pads and CIC circuits at NAL, SAL, and Emigrant is either located within the lined footprint of the heap leach pad, runs of piping between the pads and process solution ponds, as well as between the plants/CIC circuits and ponds, are all contained with HDPE-lined ditches and/or located above the CIC circuit secondary containment areas or within the CIC building (Emigrant).

As described in the 2018 Recertification Audit report and repeated in the 2021 Recertification Audit report,

solution pipelines cross the James Creek Diversion in three locations. GQ has installed special protection at these locations. No changes have been made to the crossings since the previous recertification audits and the findings of those audits are still valid.

GQ uses carbon steel for cyanide tanks and process tanks; carbon steel and HDPE pipelines for process solutions; HDPE pipelines for tailings and reclaim solutions; and stainless steel and carbon steel pipelines for reagent grade cyanide. These materials are compatible with cyanide and high pH conditions.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 4.7

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.

GQ implemented and conducted quality assurance and quality control (QA/QC) programs for the construction and modification of cyanide facilities during the 2023 Recertification Audit period. New construction or modifications to the GQ cyanide facilities that occurred since the previous Cyanide Code recertification audit include NAL pregnant sumps containment improvements and stormwater pond reconstruction, Mill 5/6 East TSF Expansion Project, Phase II – 2021 Construction, new cyanide addition line to Mill 5 CIL tanks, and new cyanide storage tanks at NAL and SAL. QA/QC programs for the construction and modifications are documented in Record of Construction Reports and quality control manuals.

GQ maintenance personnel installed the new cyanide addition line from the cyanide storage tanks in the Mill 5 Reagent Building to the Mill 5 CIL tanks. GQ contracted SkyView Testing Inc. to conduct a visual inspection and liquid penetrant testing on the line prior to placing the line into service.

The Record of Construction Report for the NAL pregnant sumps containment improvements detailed the following QA/QC procedures: for earthworks – visual observation of placement methods, field and laboratory testing on earthen materials used for fill; for concrete placement – inspection of rebar and water stop inspection, and visual observation of placement methods; for geomembrane installation – visual observation of all placement, welding, laboratory testing of seam strength, third party conformance testing. The report included the geomembrane installer field logs and manufacturer certificates. The Record of Construction report for the NAL stormwater pond reconstruction included the same QA/QC testing, except this project did not include any concrete placement.

Activities completed during the 2021 construction season for the Mill 5/6 East TSF Expansion Project

included placement and compaction of the embankment with fill material. QA/QC testing and inspections performed for this work included visual observations, water volume replacement testing, and laboratory testing for particle size distribution, Atterberg Limits, laboratory compaction, and nuclear density/moisture.

GQ has maintained copies of QA/QC documentation related to its cyanide facilities in either hard copy and/or electronic format. QA/QC documentation was obtained and reviewed for the construction and modification projects that occurred during the recertification period.

GQ retained qualified engineering personnel to review and provide construction verification documentation. The Record of Construction Reports generated during the recertification period include documentation and as-built drawings that were stamped by a Professional Engineer licensed in the State of Nevada, and were subsequently approved by the Nevada Department of Environmental Protection, Bureau of Mining Regulation and Reclamation. The visual inspection and liquid penetrant testing on the new cyanide line was completed a Skyview Testing technician who is qualified at a Penetrant Test (PT) Level II.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 4.8

Standard of Practice 4.9

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

GQ has developed written procedures for monitoring activities and maintains those procedures in the *Sampling and Analysis Plan* (revision dated July 1, 2018). The Plan describes sampling techniques, standard operating procedures, and equipment cleaning methods and includes sample identification, chain of custody, labeling/packing, and sample handling/preservation procedures. The Plan also includes a section on data quality indicators, validation, and verification. Based on discussions with the Carlin Complex Environmental Department, all sampling and analytical procedures in the *Sampling and Analysis Plan* were originally developed by appropriately qualified environmental professionals in the Carlin Complex Environmental Department and approved by NDEP. Revisions to the Plan are completed by the Carlin Complex Water Team. This team consists of a degreed Senior Environmental Engineer and three junior Environmental Engineers with degrees in hydrology or ecology.

Operations personnel perform a wildlife inspection each shift and document the inspection on a *Wildlife Inspection Form.* This inspection form contains written instructions for performing the wildlife inspection. The Wildlife Inspection form, which specifies the wildlife protection measures the inspector is to observe

at the process areas, solution channels, and leach pads. In addition, wildlife activity is inspected for and documented on the Shiftl Tailings Storage Facilities Log. The Environmental "On-Call Manual", includes a "Wildlife Incident Action Flow Chart" which details reporting requirements, information gathering requirements, preservation, disposal, and investigation protocols.

GQ's Fluid Management Plans and WPCPs specify when and where samples are to be taken. The WPCPs also specify which parameters, including WAD cyanide, must be analyzed for in the different samples.

The GQ sampling technicians document sampling conditions in field logbooks for each operating area. A comments section is used to document abnormal sampling conditions. Wildlife monitoring is continuous while employees are outside and any wildlife sightings are reported to the Environmental Department.

In the opinion of the audit team, GQ conducts monitoring at frequencies adequate to characterize and identify changes in a timely manner in the groundwater, surface water, leak detection systems, and process solutions. In addition, the monitoring frequencies have been established by the NDEP in the GQ WPCPs.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 4.9

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.

GQ has developed written procedures to decommission cyanide facilities at the cessation of operations. The permit renewal applications and closure plans were prepared in accordance with applicable state and federal requirements and contain measures to address decommissioning of the cyanide facilities, including the heap leach facility, solution ponds, collection ditches, and equipment that has contained process solutions. Measures include cyanide stabilization/neutralization, and treatment of outflows, residual chemicals, or fluids. The plans provide seasonal, temporary, and tentative final closure plans. The tentative final closure plans present preliminary details for final closure of all project facilities following cessation of

mining, heap leaching operations, and solution processing operations.

The Barrick Closure Standard, last revised in April 2020, was reviewed and the Environmental Engineering and Lands Team were interviewed during the audit. The Plan of Operations was reviewed and discussed. The GQ closure plans have been reviewed and approved by the U.S. Department of Interior Bureau of Land Management (BLM) and Nevada Department of Environmental Protection (NDEP).

GQ maintains a comprehensive reclamation and decommissioning schedule. The schedule has not significantly changed since the previous recertification audit. Once closure and reclamation are complete, post reclamation monitoring, including re-vegetation and monitor well sampling, will be conducted over approximately a 30-year period.

Nevada BLM regulations require that GQ reviews and updates the Reclamation Plan at least every three years, or as needed. The next revision to the Plan was due to be submitted to the regulatory agency later in the recertification year following this audit.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 5.1

Standard of Practice 5.2

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

The operation has developed a cost estimate for the funding of third-party implementation of the decommissioning activities defined in the reclamation and closure plans. The cost estimate is part of the Carlin Complex Gold Mines Reclamation Permit; and utilized the Nevada Standard Reclamation Cost Estimator (SRCE) to estimate the reclamation and closure costs. The estimated reclamation and closure cost is for the entire Carlin Complex operations. The cost estimate has been reviewed and approved by the Nevada Bureau of Mining Regulation and & Reclamation.

The Carlin Complex has established an approved financial mechanism to cover the estimated costs for cyanide-related decommissioning activities. The financial mechanism is surety bonds covering estimated closure and reclamation costs for the entire mine site, including cyanide-related decommissioning activities.

The operation reviews and updates the cost estimate at least every three years and when revisions to the plan are made that affect cyanide-related decommissioning activities. This is required by the authorities

(NDEP and BLM). The Barrick Closure Standard also requires ongoing reviews and updates to the Life of Mine Plan. Additionally, U.S. Securities Exchange Commission (SEC) requirements encourage annual evaluation of mine closure liabilities. The Barrick / NGM financial practices are in alignment with SEC guidelines.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 5.2

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.

GQ has developed and implemented Standard Operating Procedures (SOPs) that describe the management and operation of cyanide facilities. These procedures cover pre-work inspections, the safe operation of the facilities, decontamination of cyanide equipment prior to maintenance work, entry into confined spaces, general and task-specific personal protective equipment (PPE) requirements, and operator responsibilities.

GQ's cyanide offload procedures describe requirements for notification of arrival of the delivery truck, area inspection, barricade requirements, checking the beginning tank levels, safety buddy requirements, and emergency response.

A pre-work inspection checklist must be completed by all workers and contractors prior to starting work tasks outlined in the procedures. Workers also perform Field Level Risk Assessments (FLRAs) to identify the risks that may be associated with any task or condition in the plant. Team risk assessments are also completed for new activities being completed in the plant if more than one person is involved in the task.

Worker input is actively considered during the development and roll out of new procedures. Employees are part of the procedure review process. Process supervision initially creates the SOPs and then the operators have a chance to review and make comments on the SOP before it is finalized and approved.

Workers can actively participate in Formal Risk Assessments for projects that take place in their areas.

The Management of Change process incorporates worker input on health and safety procedures related to task and process changes. Additionally, GQ solicits worker concerns and comments on safety issues through safety training and safety meetings (monthly), and line out meetings (daily).

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 6.1

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.

GQ's SOPs specify the pH to be maintained in barren solutions for the heap leach operations and in the thickeners prior to the CIL circuits in order to minimize the generation of hydrogen cyanide (HCN) gas. The pH of the process solutions is monitored by automatic sensors with displays in the process plants and CIL circuits. Readings observed during the 2023 Recertification Audit showed that the pH of the process solutions were within the ranges specified in the SOPs.

GQ has identified the following areas where workers may be exposed to HCN: Mill 5/6 CIL buildings and platforms above the CIL tanks; Mill 5 Reagent Building where the cyanide storage tanks are located; above the NAL and SAL CIC tanks; within the Emigrant CIC Plant; and cyanide unloading areas. GQ has installed fixed HCN monitors for confirmation that controls are adequate to limit worker exposure to HCN. Fixed HCN monitors were observed during the field portion of the 2023 Recertification Audit in multiple locations in the Emigrant CIC plant (five monitors), SAL (ten monitors), Mill 5/6 (fifteen monitors), and NAL (four monitors).

The monitors have an initial alarm set at 4.7 ppm and a high-level alarm set at 10 ppm. Based on discussions with operations and maintenance personnel, they understand that they are to evacuate the area when the light is flashing, which begins at 4.7 ppm, and that a flashing light plus a siren means that HCN levels exceed 10 ppm and they are to evacuate the building. Alarm lights are mounted inside and outside of the CIC plant buildings. At Emigrant, cyanide addition to the Barren Solution Tank is interlocked with the HCN sensors and will shut off when the HCN sensors detect HCN levels of 4.7 ppm.

Workers completing tasks that have the potential for worker exposure to HCN, such as opening equipment that contained cyanide, use portable HCN monitors. The operation has multiple hand-held, portable multi-gas, including HCN, detectors (MX-6 and Gas Badge Pro).

Process maintenance is responsible for ensuring that the fixed HCN monitors undergo a monthly

calibration according to manufacturer's specifications. The handheld portable HCN monitors are kept, when not in use, in charging cradles that automatically calibrate the meters. Bump tests are done each shift and each monitor has a calibration done monthly at the docking station. The portable HCN monitors are also sent offsite for calibration by a third-party as needed. Calibration records for both portable HCN monitors and fixed HCN monitors are kept for at least three years and were available for the re-certification period.

Signs warning that cyanide is present were located at the entrance doors to the CIL and CIC processing areas and the Emigrant CIC Plant building. Other areas of the facility, such as the cyanide unloading areas, heap leach areas, and process ponds include signs identifying the presence of cyanide and state "No Eating, No Drinking, and No Smoking". Smoking, open flames, and food consumption are not allowed while working around cyanide. Smoking is only allowed in designated areas throughout the entire mine site; therefore, signs that state no smoking or open flames are allowed are only posted in key areas. The warning signs were physically evaluated during the field portion of the 2023 Recertification Audit and found posted in areas where cyanide may be present. Signage was readily visible and in good condition.

All cyanide delivered by Cyanco is dyed a red color for clear identification that the product is high-strength liquid cyanide. The Safety Data Sheet (SDS) for the sodium cyanide delivered to site was reviewed and indicates the solution is dyed. Auditors verified the color of the cyanide during the audit by observing the cyanide addition points where possible.

GQ has installed safety showers, eye wash stations, and fire extinguishers at strategic locations throughout the Operating Areas where a potential for exposure to cyanide exists. Safety showers and eye wash stations were randomly tested for effectiveness and readiness during the audit. The showers/eyewash stations tested had water at the proper temperature and pressure and water activation levers that worked properly. Locations of eyewashes and showers were deemed appropriate in terms of proximity to hazards. Alarms sounded when the emergency showers/eyewash stations were activated during the site inspection. In addition, the alarms at Emigrant also appeared on the control panel in the Emigrant CIC Plant control room.

The fire extinguishers in and around the process facilities and cyanide offload/storage tank areas were visible and inspected monthly and hydrostatically tested every three years as verified by observation of inspection tags on each extinguisher. The fire extinguishers were ABC dry chemical extinguishers.

GQ has identified tanks and piping that contain cyanide to alert workers of their contents. All storage tanks containing cyanide were labeled as "Cyanide". Piping containing liquid cyanide and process solutions were observed for signage, labelling, and directional labels.

SDSs are available in the Operating Areas through any computer terminal on the site-wide computer network via the 3E database. Operators can access the 3E database through a quick link provided on an internal intranet site. All employees are trained in how to access 3E during Annual Refresher Training. The SDSs are in English, the language of the workforce.

No cyanide related incidents (i.e., cyanide exposures or releases) occurred during the recertification period. Detailed records of completed investigations were reviewed for non-cyanide related incidents from the re-certification period. A disciplined approach was used that involved environmental, health, and safety personnel, the identification of root causes, multi-faceted corrective action plans, and formal action tracking. Corrective actions appropriately included re-training, modification of engineering and safety controls to protect workers and the environment, and procedural modifications. The "Action Manager" database is used to track actions to closure. Actions reviewed were closed out as complete. The auditor concluded that the NGM investigation procedure is implemented and effectively used by personnel to investigate incidents.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 6.2

Standard of Practice 6.3

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

Five ambulances are located at strategic locations to ensure timely response to any emergency at GQ Complex. There is a single emergency response team that services the Carlin Complex. All ambulances were observed to have planned emergency response equipment, including Cyanokits. Radios and cell phones are used throughout the operation for communications.

Oxygen and resuscitators are stored in the control rooms, in the onsite ambulance, the Emergency Response Team jump bags, and the Ambulance Barns. First Responders are trained to use and know the location of the equipment and Cyanokits.

Self-contained breathing apparatuses and cylinders are maintained by the Emergency Response Team on the fire truck and with the ambulances.

The oxygen, Cyanokits, and emergency response vehicles are inspected monthly by the Emergency Response Team. Automated External Defibrillator (AED) machines are inspected every three months by the Emergency Response Team. The Emergency Response Team inspects the ambulances on site weekly. Records of these inspections for the recertification period were randomly selected for review during the audit and appeared complete. The Process Supervisors complete a monthly inspection of the first aid kits and the oxygen tanks.

The first aid cabinets, ambulance emergency equipment, Cyanokits, Self-Contained Breathing Apparatus (SCBAs), and oxygen tanks were observed during the site inspection. Auditors verified that the Cyanokit

was stored in accordance with manufacturer's specifications (secure location, within temperature range, with regular checks for expiry dates). The ambulances are stored in temperature-controlled garages.

The Nevada Gold Mines Hazardous Materials and Cyanide Emergency Response Guideline includes specific written emergency response plans to respond to cyanide exposures. The Emergency Response Team (ERT) is trained in the use of the Cyanokit. During the Annual Refresher Training (ART) for Carlin Complex employees, the Safety Department presents training on cyanide first aid, including the use of oxygen by operations, signs and symptoms of cyanide poisoning, and response plans. In addition, employees working in cyanide areas are shown a cyanide code training video that covers emergency response and first aid.

Additionally, all personnel receive Cyanide Training that also includes First Aid Measures for cyanide exposure. The training package and training records were reviewed and accepted by the auditor.

Emergency Medical Technicians (EMTs) and Advance EMTs (AEMT) are part of the ERT. There is at least one AEMT on each shift who is qualified to administer the Cyanokit. All workers who work with cyanide have received cyanide training, which includes first aid training. Every shift has First Responders on site ready to respond to emergencies. Annual Refresher Training is provided to all workers, which includes training in cyanide first aid, including the use of oxygen, signs and symptoms of cyanide poisoning, and response procedures.

The ERT has five onsite ambulances equipped with Cyanokits and two emergency response trailers to respond to cyanide exposure incidents.

The operation has five on site ambulances that are all licensed to transport employees to Northeastern Nevada Regional Hospital in Elko, Nevada. The operation provides a Certified Emergency Vehicle Operations course to EMTs. The Emergency Response Team ambulance attendants would radio into the hospital to provide information on the incoming patient. The radios in the ambulances are in direct contact with the hospital. If additional paramedic assistance is needed, an air ambulance or offsite ambulance is available for transporting workers to medical facilities in Elko.

NGM has an agreement with the local hospital (Northeastern Nevada Regional Hospital) to provide medical services to workers in the event of cyanide exposure. Arrangements to accept patients are clearly stated in an agreement letter between the hospital and NGM that is renewed annually. The most recent letter was signed in 2022.

Landing sites for the air ambulances have been approved and were observed during the site inspection.

In addition to the agreement with the hospital, NGM maintains a memorandum of understanding (MOU) for emergency services between Eureka County and NGM. The MOU clarifies roles and responsibilities for ambulance assistance, wildfires, law enforcement, and hazardous material spills. NGM meets on an annual basis with the Board of Eureka County Commissioners to re-affirm the agreed roles and responsibilities.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 6.3

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 mine maintains several emergency response plans (ERPs) to respond to all possible emergency scenarios, including possible cyanide exposures and/or accidental releases to the environment. ERPs were most recently updated in 2022 and 2023. The emergency plans address the potential cyanide failure scenarios that are relevant for the operation, including:

- Catastrophic release of HCN
- Transportation accidents involving cyanide
- Cyanide unloading
- Cyanide releases during fire and/or explosion
- Pipe, valve, and tank ruptures
- Overtopping of ponds
- Power outage
- Environmental spill
- Failure of cyanide facilities, including treatment facilities and tailings impoundments

The auditor confirmed through interviews with emergency response personnel and a review of the emergency response planning information that the action steps in the plans are sufficiently detailed and are appropriate for the operation.

A travel route for transporting 30% liquid cyanide to all offloading areas has been established. TransWood truck trailers have internal valves to prevent them sheering off in the event of a crash. TransWood only delivers liquid sodium cyanide via tanker trucks. The auditor verified this information through an interview with a TransWood driver during the site inspection.

Cyanco and TransWood take primary responsibility for any accidents resulting in a cyanide spill up to the point of unloading at the operation. However, the ERPs do include actions to be taken for cyanide spills

on- and offsite.

Procedures for clearing site personnel from affected areas are described in the Hazardous Materials and Cyanide Emergency Response Guidelines. The plan addresses containment, assessment, and remedial response to cyanide releases. The Hazardous Materials and Cyanide Emergency Response Guidelines contain procedures for treating cyanide exposures and provide all relevant contact information for the emergency response resources. Directions for the use of oxygen are included in the Hazardous Materials and Cyanide Emergency Response Guidelines. A review of the ERPs determined that they contain a suitable level of detail regarding specific hazards and risks associated with cyanide-related emergencies from both an environmental and safety perspective.

While the site is not located near any communities that might foreseeably be affected by on- site cyanide releases, the ERPs include requirements to notify the Eureka County Sheriff, the Nevada Division of Emergency Management / State Emergency Operation Center, and the Nevada Division of Water Resources.

All the emergency plans call for stopping cyanide releases at their source. Prevention of future releases is dependent on incident investigation procedures outlined in the Incident Management and Investigation Standard that requires the identification of corrective and preventive actions following a cyanide-related incident.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 7.1

Standard of Practice 7.2

Involve site personnel and stakeholders in the planning process.

The operation involves internal and external stakeholders in its cyanide emergency response planning process.

Employees participate in the emergency response planning process by attending and contributing to daily safety meetings as well as participating in the mock drills that are conducted on site. Safety meetings are utilized to provide information and to solicit comments and ideas on cyanide safety procedures as well as cyanide response activities.

The Emergency Response Team (ERT) participates in LEPC meetings along with one or more of the NGM Emergency Response Team members. Personnel interact with Local Emergency Planning Committee (LEPC) members in Elko. Records were available for 2022 and 2023 to show that personnel have participated in regular meetings and that the Elko LEPC is active. Responsibilities for interacting with local

communities and the Local Emergency Planning Committee (LEPC) are included in the ERPs.

During these meetings, local medical, sheriff, ambulance and other invited guests are present to discuss safety in and around the neighboring communities. The ERT members also participate in LEPC drills offsite and members can bring information back to site to share for planning purposes. The operation does not have any nearby communities that would be affected by cyanide releases at the site; however, community meetings occur regularly where the NGM Community Relations Team is present and the public is invited to participate and comment on the meeting topics, which include cyanide awareness.

Mine personnel also participate in annual Threat and Hazard Identification and Risk Assessment (THIRA) and Stakeholder Preparedness Review (SPR) workshops run by the State of Nevada, Department of Public Safety. Records were available for 2021 and 2022 workshops that involved the interaction and collaboration of multiple stakeholders for the purpose of emergency response planning and threat analysis.

The ERPs clearly designate responsibilities to external responders, the Sheriff, Nevada Division of Emergency Management, and the hospital. The mine works closely with the area hospital to ensure the hospital has the proper antidotes for a cyanide incident that may occur at the mine and the hospital has agreed to assist with any cyanide victims that are transported to their facility.

Northeastern Nevada Regional Hospital annually acknowledges that the emergency room staff does know the proper procedure for treating cyanide poisoning and has a Cyanokit.

Based on discussions with the ERT Lead, the ERT incorporates comments and suggestions gathered at LEPC meetings and the community meetings into their Emergency Response Plan and training, as applicable. The ERPs were updated in 2022 and 2023 and were found to be current.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 7.2

Standard of Practice 7.3

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

The mine's emergency response plans (ERPs) were found to be appropriate for the operation. The plans address Cyanide Code requirements, as follows:

a) The ERPs discuss general response for emergencies classified as an Alert, Level 1, Level 2, or Level 3. The plans include a description of the roles and responsibilities of employees on site and leads and directs users to follow the directions in the Incident Command Center, which establishes lines of authorities for

primary and backup incident commanders.

b) The ERT has a complete roster of available Emergency Response personnel on each shift. In the event of a response to an incident, the Emergency Response Team is dispatched to the scene and the remaining pool of responders is reconfigured so that if an additional event occurs that pool of responders can be properly dispatched. Miners from NGM's other locations in Northern Nevada can be deployed as well.

c) The ERT has a monthly training schedule for all its first responders. Training is conducted while the Emergency Response Team employee is on site. First aid drills, review of Hazard and Operability Analysis (HAZOP) scenarios, rope rescues, extraction drills, and assembling of detoxification chambers occur during these training sessions.

d) Emergency Response personnel are on site each shift; therefore, the operation has 24-hour response team coverage. All Emergency Response personnel carry a radio upon arrival at site for their work shift. The Active 911 system, which is an app that Emergency Response personnel have downloaded on their phones, and radio system is used to send a tone out for the Emergency Response Team. A contact list is included in the Emergency Response Binders onsite. The contact list has phone numbers for response team members and management that can always be reached.

e) Specific duties and responsibilities are outlined in the ERPs. The information was found to be sufficiently detailed for the operation.

f) The Emergency Response Team has a Mine Rescue Equipment Inventory Sheet and an Emergency Response Vehicle Checklist that details all PPE and equipment on site.

g) All equipment used in the operation related to Emergency Response is inspected on a regular basis. The Cyanokit, oxygen, and first aid kits are inspected monthly by the Emergency Response Team and Process Supervision.

h) Northeastern Nevada Regional Hospital is trained in the use of the Cyanokit, and they are aware of their anticipated roles needed in the treatment of a cyanide exposed victim as confirmed through letters corresponding with the hospital. The roles of the Sherriff, Nevada Emergency Management office, and the hospital are detailed in the ERPs.

Northeastern Nevada Regional Hospital annually acknowledges that the emergency room staff does know the proper procedure for treating cyanide poisoning and the hospital has received the Cyanokit. NGM has a mutual aid emergency response agreement in place with the LEPC. The most recent records were available from 2022.

Mine personnel collaborate external entities in mock drills and in the development of medical protocols for emergency responders. The Nevada Mines (Medical) Protocols for EMTs were developed between the ERT Lead and a physician in Elko, Nevada. Personnel from the mine participated in an Elko County "Disaster Day" multi-organizational drill in April 2023 and participate regularly in the local LEPC meetings.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 7.3

Standard of Practice 7.4

Develop procedures for internal and external emergency notification and reporting.

The ERPs include notification procedures and contact information for notifying management, regulatory agencies, and outside medical facilities in the event of an escalated Level 3 event in which an Incident Command Center (ICC) would be activated. The ERPs include phone numbers for Elko County Dispatch, Elko County Sheriff, and the Emergency Response Coordinators.

Various positions are required in an ICC situation such as Incident Commander, Community Relations representative, Emergency Response Coordinators, logistics personnel and other key personnel. The GQ Water Pollution Control Permits and Fluid Management Plans contain information on contacting regulatory agencies of a process solution release out of containment.

The Corporate Social Responsibility team maintains relationships with the community and is tasked with notifying the area community representatives, as well as the media if required, for cyanide-related incidents. The ERPs detail the roles and responsibilities of the Corporate Social Responsibility group in the event of a cyanide incident.

Phone numbers of key area community members are listed in the ERPs. The operation does not have any nearby communities that would be impacted by a cyanide release at the site.

Nevada Gold Mines developed a new procedure in 2023 in response to the new ICMI requirement for a documented procedure for notifying ICMI of any significant cyanide incident. The procedure, entitled "Significant Cyanide Incident Reporting Procedure" was approved by the Environmental Manager, Safety and Health Manager, and the Security Manager. The procedure defines "significant cyanide incident" and the definition matches the ICMI definition. The procedure includes detailed notification steps from the moment of discovery through the initial 24-hour period in which ICMI is to be notified. The notification email and phone number for ICMI are included in the procedure. Nature of the information that is to be reporting, roles and responsibilities for immediate reporting, and the responsibility for a 7-day follow-up with ICMI are included. The procedure was noted as a Best Practice by the auditor. The operation did not experience any significant cyanide incidents during the re-certification period.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 7.4

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

The mine takes specific remedial measures in the instance of a cyanide release as specified in the Fluid Management Plans and Cyanide Spill Response and Clean Up Standard Operating Procedure (SOP). According to the plans and SOP, all affected soils and solution are to be placed on the heap leach pads or in the tailings impoundment; the Environmental and Health and Safety departments will work with the Emergency Response Team on proper neutralization, if required. The operation does not store treatment chemicals on site. Emergency containment structures to contain the cyanide solution will be constructed with available resources on site; all proper PPE will be worn when neutralizing spilled cyanide; and HCN monitors will be used during the recovery and neutralization process.

The Cyanide Spill Response and Clean Up SOP details neutralization, cleanup, and disposal requirements in the event of a process solution release. All cyanide-contaminated soil is to be placed on the heap leach pad or tailings impoundment. The soil will be excavated until the cyanide concentration level is below the requirements outlined by the NDEP. The operation coordinates soil-sampling requirements with NDEP. The Environmental Department determines the extent and location of soil sampling in consultation with NDEP. The Equipment Decontamination SOP details procedures for decontamination of equipment or materials that come into contact with cyanide solution.

Per discussions with the Environmental Department, all spill clean-up debris related to any cyanide spill would be rinsed and diluted per the Equipment Decontamination SOP and properly disposed of in the heap leach pad or tailings impoundment after verification that no residual cyanide remains. If needed, material can be sent offsite as hazardous waste as well. Verification of residual cyanide levels is through sampling of the material, analysis by an accredited laboratory, and a comparison of the analytical results to allowable limits.

In the event a cyanide spill affects the potable water supply for the mine site, the operation will provide bottled water to its employees.

The ERPs state “Hypochlorite solutions, Hydrogen Peroxide Solution, or ferrous sulfate shall not be used when spills have reached flowing water bodies.” In the event of a cyanide spill, the operation is required to do extensive soil sampling to verify that no residual cyanide remains in the affected area. Mine personnel coordinate soil sampling requirements with NDEP. The Environmental Department determines the extent and location of soil sampling.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 7.5

Standard of Practice 7.6

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

The ERT periodically updates their ERPs based on the after-action findings from cyanide mock drills to ensure that the ERPs remain adequate. The site requires the ERPs to be reviewed at least annually. The Fluid Management Plans, Cyanide Spill Response and Clean Up SOP, and Cyanide Medical Emergency SOP, which detail emergency response for cyanide releases, are reviewed as needed. The ERPs were most recently updated in 2023 and were found to be up to date.

The audit included a records review of the mock drills that have taken place during the recertification period. The mock drill records are maintained by the ERT Lead. The drills were different in nature and tested different aspects of the response procedure. The operation maintains its drill records in SharePoint. The drills reviewed included an operator who went down in the lab and had suspected cyanide exposure, a cyanide spill at the GQ Autoclave operation (both Gold Quarry and Goldstrike personnel participated), and a tailings dam emergency. The lab exposure drill was a physical drill, and the other cyanide drills were tabletop exercises.

Physical drills for non-cyanide related scenarios were performed together with external responders and many different organizations. These hands-on drills were useful for ensuring that all personnel understand their cross-organizational roles in an emergency and for ensuring that communication channels are robust.

The operation evaluates and revises the ERPS, as necessary, after any incident requiring the implementation of the ERPs. “After Action” records with response evaluations were available for the drills and actual (non-cyanide) incidents during the recertification period that required responses. Drill critiques were also available for the county multi-organizational drill that was reviewed during the audit. Personnel interviewed confirmed that actions are tracked, and ERPs are updated, if necessary, following drills and actual deployments. Aside from additional training and improvements with communication equipment, there were no corrective measures needed from recent drills and/or ERP responses.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 7.6

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.
All personnel who may encounter cyanide are trained in cyanide hazard recognition before starting to work at the mine. The training is given together with the annual Mine Safety and Health Administration (MSHA) refresher training for a week in town prior to coming to the mine to work. Cyanide hazard recognition / safety training is given to all personnel on an annual basis. The training materials were available for review and training records were found to be complete for the recertification period. Cyanide training records are retained along with other training records for the length of employment. Cyanide training records for the recertification period were found to be complete. Carlin Complex holds its Annual Refresher Training each year and all employees are trained and refreshed in cyanide hazard recognition. The training materials reviewed for 2021-2023 include training and refresher information on cyanide exposure routes, the HCN gas detector warning light system, signs, and symptoms of poisoning, first aid, and directions to administer oxygen. Cyanide training records are retained along with other training records for the length of employment. Training records were available for review and were found to be complete. Employee understanding of cyanide-related hazards and risks was acceptable.
The operation is: ☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with — Standard of Practice 8.1

Standard of Practice 8.2
Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.
Workers are trained to perform cyanide- related tasks safely with respect to themselves, their teams, and the environment through orientation training, cyanide awareness training and videos, training criteria checklists, and SOP reviews. The training includes cyanide safety, environmental, and process issues. Operators are required to

complete the training criteria checklists, which include reviewing all applicable SOPs, prior to working in these areas and all documentation is kept in their personnel files on site.

Verification of training of operators was conducted with the Process Supervisor and Leach Foreman while on site as well as reviewing a sampling of training records from the recertification period.

The Process Division training program includes training presentations, a cyanide training video, training criteria, and SOPs for specific tasks.

Workers are trained on the equipment, given a walkthrough of the work area, review white board drawings of the facilities, and are required to demonstrate competency prior to working unsupervised on a job..

Following the new hire training and job departmental training, the primary training method is on-the-job training which is provided by a competent person. The employee is instructed on the proper use of the equipment and related safety hazards. The training criteria checklists outline task specific details.

Only qualified personnel who have knowledge of the area and specific tasks provide task training to operators and mechanics working with cyanide. New hire training and the department-specific cyanide training is provided to all new employees by those qualified and experienced to conduct the training and communicate requirements. The mine trainers are competent in the subject in which they teach. Trainers are lead personnel, supervisors, experienced personnel, dedicated process trainers, or a combination of all four. Trainer qualifications were sampled and were found to be appropriate.

Employees who will be working with cyanide are required to have training in cyanide safety and first aid before they are scheduled to work in a cyanide area. The auditors interviewed the employees and sampled training records to validate that employees are trained in cyanide before beginning their work.

Refresher training on cyanide management tasks is performed on an annual basis to ensure that employees continue to perform their jobs in a safe and environmentally protective manner.

The mine evaluates the effectiveness of cyanide training in both written and verbal formats. Written tests are kept in the personnel files to document that employees are current and tested. These records were reviewed during the audit. A competent person trains and observes a new employee working before signing the new employee off on the training criteria checklist. New employees must demonstrate knowledge for each task identified on the training criteria checklist.

During the site inspection, the auditors asked the employees questions like what they have been tested on, and their responses were accurate.

All training records throughout an employee's employment are kept in their files located on an internal SharePoint site and supervisors are responsible for keeping hard copy records for their employees. A review of several operator files was conducted for completeness and SOPs reviewed with the employee and cyanide assessments were in their files as proof that training occurred. Tests and associated completed MSHA 5000-23 training forms are kept in these same files and uploaded via scanning into electronic

format. The training records include the trainer, topics covered, and date of training. These files are only purged after an employee leaves the company and storage of all files are kept in accordance with company record retention policies.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 8.2

Standard of Practice 8.3

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

All workers who work in or may enter cyanide areas are trained in the potential exposures and appropriate emergency response for worker exposure and environmental releases of cyanide. Personnel at the mine who are responsible for the offloading of liquid cyanide, production, and maintenance are trained in decontamination and first aid procedures for cyanide release incidents.

Employees working with cyanide are trained in cyanide awareness, cyanide emergency response (including evacuation), first aid for cyanide poisoning, spill response (spills and leaks in the process area, spills during transportation of cyanide, etc.), use of the emergency response equipment, Mayday procedures, signs, audible and visual alarms and SDSs.

First aid, CPR, general cyanide awareness, and oxygen administration training is provided to all employees.

The auditors reviewed a representative sampling of training records. The characteristics of cyanide exposure, first aid procedures, and location of emergency equipment were discussed with process personnel and emergency responders to verify their understanding.

Per discussions with the Health Safety & Emergency Response Superintendent, all Emergency Response Coordinators and Emergency Response Team members are trained in the procedures described in the Emergency Response Plans (ERPs). Training includes MSHA, HAZMAT, and First Responder training, firefighting, advanced first aid, vehicle and equipment rescue, rope rescue for confined space and highwall rescues, all incident command positions, as well as additional miscellaneous training. The Emergency Response Team meets monthly for training. All Emergency Response Team members are trained in equipment that is used for responding to cyanide related exposures and releases. Site leadership is also trained in the Incident Command Center (ICC).

Northeastern Nevada Regional Hospital annually acknowledges that the emergency room staff does know the proper procedure for treating cyanide poisoning and the hospital has received the Cyanokit. NGM has

a mutual aid emergency response agreement in place with the LEPC. The most recent records were available from 2022.

Mine personnel collaborate external entities in mock drills and in the development of medical protocols for emergency responders. The Nevada Mines (Medical) Protocols for EMTs were developed between the ERT Lead and a physician in Elko, Nevada. Personnel from the mine participated in an Elko County "Disaster Day" multi-organizational drill in April 2023 and participate regularly in the local LEPC meetings.

Annual Refresher Training (ART) is conducted each year and all employees are trained and refreshed in cyanide hazard recognition. The training that was presented describes cyanide exposure routes, the HCN gas detector warning light system, signs, and symptoms of poisoning, first aid, and directions to administer oxygen. The training includes the proper response actions for cyanide exposure and release. Emergency Response Team members receive additional training on exposure and environmental release response topics to ensure the appropriate level of response capability for the operation.

Training records are retained and document the training employees receive at the mine. The records include the names of the employees as well as the trainer(s), the training date, and the topics covered. Cyanide hazard awareness tests are administered and maintained as records to demonstrate that the employees understand the training materials.

Emergency Response Team members' training records are tracked through the Emergency Response Team SharePoint site.

The auditors verified compliance through interviews with the Health & Safety Emergency Response Superintendent, the Maintenance Trainer, and a review of a representative sampling of training records from the recertification period.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 8.3

Principle 9 | DIALOGUE

Engage in public consultation and disclosure.

Standard of Practice 9.1

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

The mine works openly with stakeholders and has developed robust stakeholder engagement processes to ensure that effective communications are maintained. Information specifically regarding cyanide management practices, risks, and outreach information was most recently communicated to external stakeholders in 2022 at a meeting with the community. The cyanide producer, Cyanco, was invited to discuss cyanide safety and the use of cyanide at the mine.

Nevada Gold Mines maintains a Community Relations telephone number, email address, and website for connecting with communities near all its mines. This contact information is available to the public in the form of a "Community Card" and on the website. Communities are encouraged to offer feedback and ask questions. The Corporate Responsibility Specialist was interviewed and numerous examples of community engagement including meetings, tours, and one-on-one outreach activities were available for review. The Corporate Social Responsibility group completes weekly and quarterly reports where NGM records and tracks engagement issues and concerns related to NGM's operations. According to a review of records and interviews, there have been no concerns voiced by the communities regarding cyanide.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 9.1

Standard of Practice 9.2

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

NGM holds quarterly community meetings where members of the public are provided with information on the Carlin Complex Operating Areas. A phone number and e-mail address are listed on the Nevada Gold Mines Community Card that is made available to the public via community newspapers that allows individuals to inquire regarding cyanide use and other issues.

Carlin Complex provides periodic tours of the facility, which includes reviewing cyanide awareness and hazards. Information specifically regarding cyanide management practices, risks, and outreach information was most recently communicated to external stakeholders in 2022 at a meeting with the

community. The cyanide producer, Cyanco, was invited to discuss cyanide safety and the use of cyanide at the mine.

The Corporate group issues an annual Sustainability Report to the public that contains information on the activities at Carlin Complex as well as a description on cyanide controls.

Compliance was verified through an interview with the Corporate Social Responsibility Specialist and by viewing various handouts, websites, and meeting agendas.

The US Census Bureau reported that 86 percent of the population in Elko County are high school graduates or higher, indicating a high degree of literacy in the region. This high degree of literacy reduces the need for extensive dissemination of information in verbal form. Nonetheless, NGM has verbally disseminated information on cyanide management through community meetings and videos online.

The Gold Fever Seminar is held every year and is a venue to educate the community on cyanide safety. Gold Fever is where NGM employees volunteer at local elementary schools to walk school age children through a gold mining activity. Mining Rocks is a tour on site for high school Juniors and Seniors that provides an opportunity for NGM to share information on cyanide.

The operation's Water Pollution Control Permits require that the operation file quarterly and annual reports to the NDEP that include a report of any cyanide spills and releases. These reports are available to the public.

Additionally, NGM is required to complete MSHA reports that include any cyanide-related worker exposure or death.

NDEP makes information regarding incidents publicly available through a request process (https://ndep.nv.gov/environmental-cleanup/all-appropriate-inquiry). A database of open and closed cleanup activities is accessible through this website. A search of the database did not identify any cyanide-related incidents pertaining to this operation.

Operational and environmental information is provided in the Barrick Gold Corporation Sustainability Report and on NGM's website, https://www.barrick.com/English/operations/nevada-gold-mines/default.aspx. Links to the Barrick Sustainability Report are available, in addition to investor presentations and other news releases.

For items a) through e), the mine publicly reports when any person is hospitalized or killed by a cyanide incident, any releases occur out of containment, any incidents have caused adverse effects to anyone's health or the environment, any spills from TransWood cyanide delivery trucks while enroute to site, or any releases that cause applicable limits for cyanide to be exceeded occur.

No incidents of cyanide-related offsite releases or cyanide exposures occurred during the re-certification period. Operational and environmental information is provided in Nevada Gold Mines corporate annual report and on NGM website: https://www.barrick.com/English/operations/nevada-gold-

mines/default.aspx Links to the Sustainability Report are available, in addition to investor presentations and other news releases. The Sustainability Report generally includes global and regional, rather than site-level, information. The operation reports publicly available environmental release information to the NDEP on a quarterly basis. In the event of a fatality, this would be reported immediately to the Mine Safety and Health Administration (MSHA) and would be available to stakeholders through the MSHA database. There have been no incidents of off-site releases, exposure or other reportable incidents relating to cyanide during the recertification period. This information was confirmed through interviews with the Corporate Social Responsibility Manager, Environmental, Health, and Safety personnel, as well as a review of MSHA and environmental reporting information.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 9.2