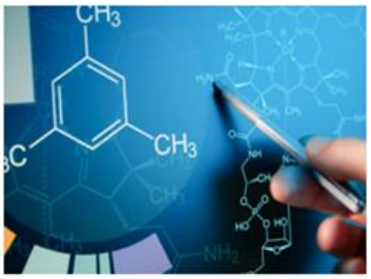
ICMI Mining Operations Verification Protocol (Revision June 2021)

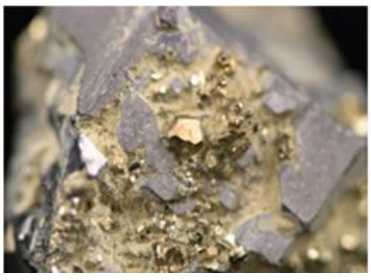
Summary Audit Report

Nevada Gold Mines, LLC – Cortez District

2023 Re-Certification Audit




Submitted to:

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MSS® Code Certification Service

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Operation General Information

Name and location of Mine:	Cortez District Crescent Valley, Nevada – USA
Name of Mine Owner / Operator:	Nevada Gold Mines, LLC
Name of Responsible Manager:	Dan Worthy Nevada Gold Mines – Cortez District HC66 Box 1250 Crescent Valley, Nevada USA 89821-1250 Email: dworthy@nevadagoldmines.com

Location Detail and Operation Description

The Nevada Gold Mines (NGM) Cortez District (Cortez) is located 78 kilometers southwest of Elko, Nevada; and approximately 14 miles southwest of Crescent Valley, Nevada (see Figure 1). The Cortez District covers approximately 2,800 square kilometers and consists of the Cortez Pipeline property and the Cortez Pediment property. The Cortez Pipeline property includes the Pipeline open pit and the Cross Roads open pit. The Cortez Pediment property consists of the Cortez Hills open pit and underground mine. In 2016, Cortez purchased the Robertson Mine which is located 4 miles north of the Pipeline Mill. The intent is to develop a shallow open pit property.

Cortez recovers gold by two processes: lower-grade oxide ore is heap leached, while higher-grade non-refractory ore is processed in a conventional mill using cyanidation and a carbon-in-leach (CIL) process. Refractory ore that is mined intermittently is stockpiled and transported off-site for processing. Low-grade ore is hauled directly to the heap leach pads.

The Cortez Pipeline property consists of two open pits, Pipeline and Cross Roads, with an associated dewatering system, waste rock dumps, one active heap leach facility with an associated carbon-in-column (CIC) circuit, a CIL circuit in the Pipeline Mill (Mill 2), a refinery, and a tailings storage impoundment. The heap leach pad and associated CIC circuit is in an area known as Area 30. Mill 2 includes a CIL process, storage tanks, thickeners, a refinery, secondary containment systems, associated appurtenances, and all sumps, pumps and piping necessary to interconnect the components. Mill 2 also includes the Plant Spill Pond (PSP) for spill control. Loaded carbon from the CIC circuits is hauled to Mill 2 for processing. The operations are designed, permitted, and operated as zero-discharge facilities.

Area 28, which is also considered part of the Cortez Pipeline property consists of an inactive heap leach pad, a pregnant pond, a reclaim /barren solution pond, a storm water event pond, and out of service ancillary support facilities to process heap solutions. This area was decommissioned in 2018 and all cyanide related

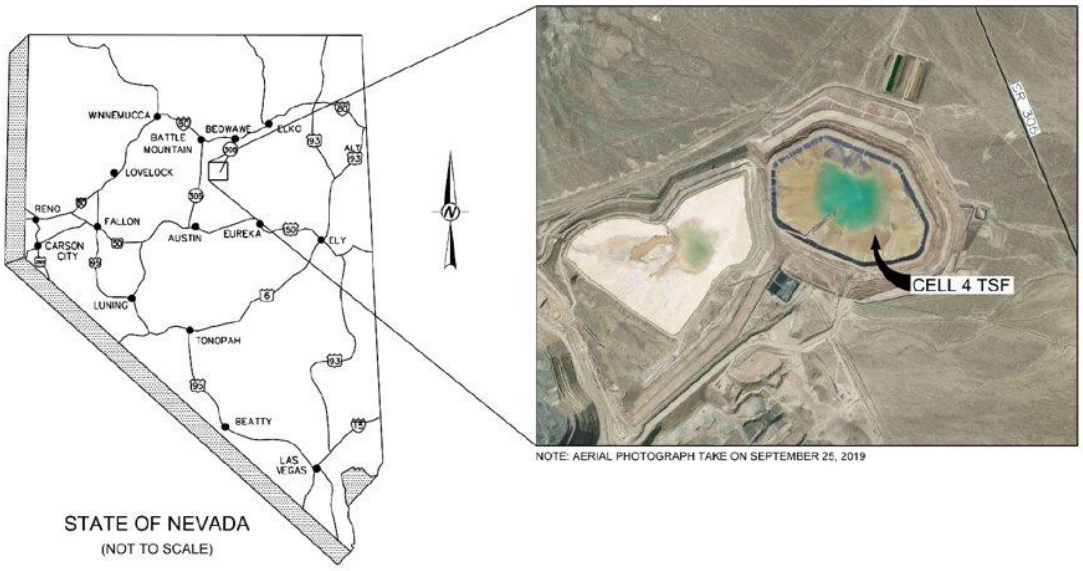
equipment removed. The Area 28 ponds are maintained for water management as they collect the drain down from formerly active Cells 1 and 2 of the tailings storage facility (TSF) and water pumped from Cell 4 of the TSF, which is the active cell of the TSF. The leach pond now serves as an evaporative pond and contributes to site water management. Cells 1 and 2 within Area 28 TSF are no longer in operation and were dry (i.e., they did not contain any free-standing water) during the field portion of the 2023 recertification audit. The reclaim water pipeline from the TSF returns reclaim water to Mill 2 for reuse.

The Cortez Hills underground mine is accessed via twin declines at the portal in the old Cortez Gold F Canyon pit. Cemented rock fill is used as backfill in the underground mine. Paste backfill with mill tailings is not used in the Cortez Hills underground mine. The ore from the underground mine is high grade ore that is transported across the valley in haul trucks to Mill 2.

Mining has ceased in the Cortez Hills open pit. Ore from this open pit was taken to the Area 34 Heap Leach Pad. This heap leach pad is still actively leached. Leach solutions are collected and routed to the Area 34 CIC circuit located within a building.

Cortez has three cyanide unloading and storage tank areas: (1) Mill 2, (2) Area 30, and (3) Area 34. The Mill 2 cyanide storage tank is 15 feet in diameter and 20 feet high; Area 30 has two cyanide storage tanks each 12 feet in diameter and 20 feet high; and Area 34 has two cyanide storage tanks each 13 feet by 20 feet. The unloading and storage areas are located away from public access and no surface water bodies are nearby. The storage tank areas and the cyanide unload areas are designed and constructed to contain and recover any leakage from the tanks and cyanide delivery trucks.

Figure 1: Cortez District Location



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, engineering, operators, and environmental, health, and safety (EHS) staff. The audit team used the 2021 International Cyanide Management Institute *(ICMI) Cyanide Mining Operations Verification Protocol* to evaluate International Cyanide Management Code (Cyanide Code) compliance of the operation.

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 (EHS) 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.

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 the ICMI Cyanide Code.

Auditor's Finding

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

The auditor found that the overall level of preparedness and understanding of ICMI Cyanide Code requirements was excellent. Management systems upon which the operation is based are mature, and requested records were readily available for review.

The results of this re-certification audit demonstrate that the NGM Cortez District is in **FULL COMPLIANCE** with the International Cyanide Management Code.

Compliance Statement

The operation has not experienced any compliance issues or significant cyanide incidents, as defined by ICMI, 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
Mine Technical Auditor:	Gina Rau E-mail: gina.rau@mss-team.com
Dates of Audit:	May 1 - 4, 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 Institute *Mining Operations Verification Protocol* and using standard and accepted practices for health, safety, and environmental audits.

NGM Cortez District		September 24, 2023
Name of Operation	Signature of Lead Auditor	Date

NGM Cortez District		September 24, 2023
Name of Operation	Signature of Lead Auditor	Date

Principles and Standards of Practice - Cyanide 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) – Cortez District (Cortez) purchased sodium cyanide 30% aqueous solution from the Cyanco Company, LLC (Cyanco) during the term of the 2023 recertification audit period – March 2020 through April 2023. During the term of the 2023 recertification audit period, two purchasing agreements were in effect. The Supply and Service Agreement #2275863 between NGM (formerly Barrick Gold of North America) was signed in May 2008 and became effective January 1, 2009. This agreement was amended on December 19, 2018, to extend the agreement to March 31, 2021. The Master Supply Agreement #4600001462 between NGM and Cyanco became effective on January 4, 2021, and has an end date of December 31, 2025. Cortez is listed in both agreements. Based on review of a representative sample of Bills of Lading (BOLs) and interviews with Cortez's Warehouse Supervisor, Cortez 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.
Cortez maintains the BOLs for cyanide deliveries electronically and in hard copy form. Based on review of a representative sample of BOLs, Cortez maintains the BOLs for cyanide delivered to Cortez during the 2023 recertification audit period. The BOLs clearly identify that the cyanide was obtained from the Cyanco Winnemucca, NV production plant and transported by TransWood to the Cortez District cyanide storage facilities located at Areas 30 and 34 and at the Cortez Mill 2. Based on review of a representative sample of BOLs, cyanide was transported to Cortez solely by TransWood during the 2023 recertification audit period. TransWood is a signatory to the Code and has been recertified as compliant under the Code. TransWood was certified originally as Code compliant on October 11, 2006, and was most recently certified 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.

No changes have been made to the unloading and storage facilities at Mill 2, Area 30, and Area 34 since the previous recertification audit, except for the replacement of the west cyanide storage tank at Area 30. At the time of the 2023 recertification audit, the west cyanide storage tank at Area 30 had been replaced with a new 15,000-gallon stainless steel tank. The new tank was in place on the existing concrete pedestal within the existing concrete containment area; however, the piping to and from the tank was not connected and the tank was not in service. Therefore, final documentation on the construction of the tank and piping systems was not yet prepared and will be reviewed during the next recertification audit.

Cortez's cyanide facilities were designed and constructed in accordance with sound and accepted engineering practices. Cyanide storage tanks and piping are constructed of materials compatible with cyanide, cyanide offloading areas are located on concrete containment pads that drain to secondary containment areas, and cyanide storage tanks are located within concrete secondary containment areas that either drain to a process solution pond or drain to a sump that transfers liquid back to the process.

Cortez only receives liquid sodium cyanide solution and therefore, does not have cyanide mixing facilities for solid cyanide. The auditor inspected Cortez's cyanide unloading and storage facilities and observed them to be in good condition during the 2023 recertification audit.

To minimize human exposure during cyanide unloading and storage, cyanide unloading, and storage facilities are located outdoors. Cortez places cones around the cyanide unloading areas to create a red zone to prevent personnel from driving into or entering an area during a cyanide unloading event. The auditor observed the placement of the cones during two cyanide unloading events during the field portion of the 2023 recertification audit.

The cyanide unloading and storage facilities at Mill 2, Area 30, and Area 34 are located away from offices and frequented work areas. These facilities at Areas 30 and 34 are located within securely fenced areas that can only be accessed with a badge through the main gate or with a key to unlock gates located along the perimeter fencing. Mill 2 is located within the main processing area of the Cortez Pipeline property and can only be accessed with a badge through the main gate.

No towns or houses are in the vicinity of Cortez. The nearest town is Crescent Valley, which is located 13 miles from Cortez.

Cortez is in an arid region with annual precipitation totals up to 8 inches during the 2023 Recertification Period. Based on review of maps and discussions with Cortez's Environmental Department, no perennial or ephemeral surface water is present near Cortez's cyanide facilities. The closest surface water to Mill 2 is Indian Creek and Ferris Creek, which are perennial streams located approximately 5 miles to the northwest. Horse Creek is the closest creek to Area 34, which is a seasonal creek located on the other side of the Tenabo Mountains.

The three cyanide unloading areas are constructed of coated concrete slabs, which provide an adequate barrier to prevent seepage to the subsurface. The concrete slabs in Areas 30 and 34 were observed to be in good condition during the field portion of the 2023 recertification audit. Some minor cracking in the Mill 2 containment slab was observed where the coating was damaged. Cortez confirmed that the coating is slated for repairs during summer 2023. This was accepted by the auditor.

Cortez uses level indicators, high level alarms, and procedural controls to ensure that the cyanide storage tanks are not overfilled. The five cyanide storage tanks are equipped with electronic level indicators with digital readouts at the unloading area and on the computer in the control rooms. The auditor observed the tank levels at the storage tank areas and on the control room screens to verify that the level indicators were functioning. The tanks are equipped with high and high-high level alarms. The level indicators are inspected monthly in accordance with Cortez's preventive maintenance schedule.

Based on discussions with two TransWood drivers during the field portion of the audit, both drivers indicated that they observe the tank level on the readout near the tank and compare it to maximum allowable tank level listed on their paperwork. Both drivers indicated that they cannot begin transferring cyanide from their truck to the tank unless the tank level reading is below the level listed on their paperwork.

The five cyanide storage tanks are located within coated concrete secondary containment areas. The auditor observed the containment areas to be in good condition; thereby, providing a competent barrier and preventing seepage to the subsurface.

Cortez's five cyanide storage tanks are located outside in well-ventilated areas with minimal potential for hydrogen cyanide (HCN) gas build-up. The storage tanks are located within securely fenced areas that are access controlled. Cortez does not receive or store cyanide in a solid form.

Based on observations during the field portion of the audit, the cyanide storage tanks are in secondary containments areas that separate the cyanide from, and prevent mixing with, incompatible materials, food, animal feeds, tobacco products, and other chemicals storage areas. The auditor did not observe other chemicals, food, animal feed, or tobacco products being stored in the secondary containment areas for the cyanide storage tanks.

The operation is:	☒ In full compliance with ☐ In substantial compliance with	Standard of Practice 3.1

☐ Not in compliance with

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.

Cortez only receives liquid cyanide in bulk tanker trucks. Cortez does not receive, use, or manage cyanide drums, bags, containers, or liners. The transporter (TransWood) driver offloads the cyanide from the tanker trucks into Cortez's cyanide storage tanks and then returns the truck to the cyanide supplier (Cyanco). The tanker trucks are not left at the mine and Cortez cannot reuse the tanker trucks for any other purpose.

Based on interviews with two TransWood drivers and Cortez operators during the field portion of the audit, the TransWood driver is responsible for cleaning any cyanide residue present on the tanker truck valves, hoses, and connections and for closing all valves on the tanker truck and the valve on the unloading line that leads to the cyanide storage tanks. 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.

Dripless discharge fittings are used in conjunction with "Ergo Brackets" installed on the quick-release couplings on the feed lines to the cyanide storage tanks. The Ergo Brackets provide hose support and a catchment trough that collects any drips when connecting or disconnecting hoses to the storage tank feed lines. The auditor observed the catchment troughs in the three unloading areas and found them to be in good condition and free of cyanide salt deposits.

The Cyanide Offloading procedure requires Cortez operators to complete a Field Level Risk Assessment (FLRA) and a work area inspection prior to offloading cyanide from a delivery truck. This includes a visual inspection of the unloading area and equipment. The TransWood driver is responsible for inspecting their cyanide tanker and equipment, including shutoff valves and hoses. The Cortez operator only removes the lock from the valve on the cyanide storage tank feed line. The TransWood driver is responsible for uncapping the quick-release coupling on the cyanide storage tank feed line, connecting the hose, and opening and closing the valves on the feed line.

TransWood maintains and provides hoses for unloading. The couplings and valves at the cyanide offload areas are maintained by Cortez and are on a monthly preventive maintenance inspection program.

Records were available to demonstrate that cyanide offload areas were inspected, as planned throughout the recertification period. The equipment was found to be in good working order at the time of the audit.

Cortez operators verify that TransWood drivers are wearing the required personal protective equipment (PPE). This is recorded on the Cyanide Offloading Check Off Sheet. Cortez operators directly observe the TransWood driver from outside the red zone while the driver attaches the transfer hose, opens the valves, and begins the cyanide transfer. During the transfer, operators either directly observe the driver by standing outside the red area (Area 30) or observing remotely via camera (Area 34) or the Control Room operator observes remotely via camera (Mill 2). Once the cyanide transfer is complete, the TransWood driver notifies the Cortez operator/Control Room and the operator observes the driver disconnecting and returning the transfer hose to the delivery truck.

Cortez only receives liquid cyanide solution that has had the colorant dye added by Cyanco at their Winnemucca production facility. This practice was confirmed through interviews and a review of records at the site. In addition, Amendment Number 01 to the current supply agreement between Cyanco and NGM, with an effective date of December 1, 2021, requires the addition of a red dye colorant to the cyanide.

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.

Cortez has developed and implemented written management and operating plans and manuals, and standard operating procedures (SOPs).

In addition to the manuals, standards, and SOPs, the following Cortez permits authorize the construction and stipulate operating requirements for Cortez's cyanide facilities:

- Water Pollution Control Permits (WPCPs): NEV0093109 and NEV2007106
- Industrial Artificial Pond Permits (IAPP) issued by the State of Nevada Department of Wildlife

To verify compliance, the auditor reviewed SOPs, interviewed operations personnel, and completed a site

inspection for evidence of implementation.

The WPCPs issued by the Nevada Division of Environmental Protection (NDEP), the Operations, Maintenance, and Surveillance (OMS) Manuals and Operating Plans that Cortez has developed, and the SOPs reviewed during the audit identify the assumptions and parameters incorporated into the facility's design and identify the applicable regulatory requirements.

Parameters identified in the OMS Manuals for preventing or controlling cyanide releases and exposures include: barren solution application rates to minimize and eliminate ponding on the heap leach pads; maximum height of and allowable tonnage on the heap leach pads; leak detection sump rates; and capacity, freeboard requirements, and the design storm event for the Cell #4 TSF and process and stormwater ponds. Cortez operates their stormwater ponds as normally empty.

The IAPPs issued by the Nevada Department of Wildlife (NDOW) provide the operating requirements for impoundments containing materials, compounds, or chemicals that cause or could cause the death of wildlife. The permits list the measures that Cortez must take to prevent wildlife from gaining access to such materials or render the materials harmless to wildlife. Measures listed include fencing, covering/containment, chemical neutralization or isolation, and wildlife monitoring.

Cortez has developed SOPs and OMS Manuals that define the procedures and responsibilities for compliance with the Code, including inspection and preventive maintenance (PM) requirements. The WPCPs specify the regulatory requirements for cyanide process solution management and monitoring/sampling of process solution, surface water, and groundwater.

Cortez has also developed and implemented inspection and PM programs which includes practices for safe and environmentally sound operation of their cyanide facilities. Cortez uses a computer-based system (SAP) for identifying, assigning responsibility, scheduling, and tracking the completion of the PM 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 (i.e., HCN monitors, pH probes, cyanide pumps, back-up generators, storage tanks, level indicator alarms, secondary containment cracks, and others).

Process personnel conduct routine inspections of Mill 2, tailings pipeline, TSF, and heap leach areas, including the pads, pond systems, and process plants. Inspections are documented on hard copy forms.

Inspection and monitoring records were reviewed for the recertification period, and they demonstrate that inspections are completed as scheduled and procedures are in place to inspect and monitor the operations to ensure that facilities are operated in a safe and environmentally sound manner. In addition, the auditor observed the site to be well maintained.

Cortez 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. Management of Change is also a key requirement in the NGM

Integrated Management System (IMS).

The *Nevada Gold Mines Change Management Workflow* process description is the documentation available at point of use in the MOC database and it was reviewed during the audit. Interviews were held with personnel responsible for managing recent cyanide-related changes. The documented process combined with the software platform and built-in software instructions and control points are mature and well designed. The user of the system must select if cyanide-related processes or equipment are involved in the change. If so, a message appears that requires that Health, Safety, and Environmental personnel be named as approvers of the MOC.

The MOC process includes a full risk assessment to determine if the proposed change may increase the potential for cyanide releases and/or worker exposure. The process also calls for controls to be identified to ensure that negative impacts associated with the change are avoided and/or mitigated. The MOC process, as it was applied to recent changes, was noted as being a Best Practice during the audit due to the very high level of detail and risk management expertise demonstrated.

All MOCs reviewed were found to be complete with thorough risk assessments that included cyanide-related risks to humans and the environment. Controls that were used to mitigate risks were clearly documented and approvers included Environmental and Health & Safety professionals.

The OMS Manuals contain procedures to address upset situations in the operation of the Area 30 and 34 heap leach pads and associated ponds and the TSF. The procedures address both normal operations of water levels and upset or abnormal operations. Corrective action steps are based on available freeboard in the process ponds and generally involve reducing the fluid volume in the ponds to prevent overflowing. This is primarily achieved through the transfer of solution to the stormwater ponds to take advantage of the pond storage capacities as a system.

Site personnel conduct a variety of inspections on Cortez's cyanide facilities. These inspections are documented on inspection forms. These forms include space for personnel to note deficiencies or problems observed during the inspection. Items requiring attention are addressed by process personnel or by maintenance personnel through the work order system. Records were reviewed and found to be complete by the auditor.

The OMS Manuals and renewal applications for the WPCPs address temporary closures where needed. Temporary closure or cessation of operations due to situations such as work stoppages, seismic activity, weather, unfavorable economic conditions, or other upset conditions are included. The OMS Manuals have detailed sections for Seasonal Closure, Temporary Closure, and Tentative Plan for Permanent Closure (TPPC). These plans, within the OMS Manuals and WPCP renewal applications areas required by the NDEP.

Based on discussions with the operators and a review of completed inspections and unloading checklists, inspections are being completed, as planned. Records were found to be complete and in alignment with Code requirements.

In addition to operations personnel conducting routine visual inspections of tanks for structural integrity and signs of corrosion and leakage, maintenance personnel perform ultrasonic wall thickness testing of the cyanide storage tanks on an annual basis. Inspection records for the recertification period were available for review during the audit and were found to be complete.

Secondary concrete containment areas are inspected weekly and monthly for integrity, salt build up, cracking, and presence of fluids. Secondary containments were observed during the audit as being in good condition and drains on cyanide storage tanks and piping were blind-flanged with the valve preceding the blind flange locked in the closed position.

Leak detection systems have been installed for the process solution ponds, heap leach pads, underdrain solution channels, Area 28 TSF Cells 1 through 4, and solution transfer and collection channels as required in Cortez's WPCPs. Cortez monitors the leak detection sumps and ports on a weekly basis in accordance with the WPCPs. The auditor reviewed a sampling of the Weekly Leak Detection Monitoring Form for the recertification period and found them to be complete.

Pipelines, pumps, and valves are inspected as part of the monthly and weekly cyanide inspection. Records from these inspections were reviewed during the audit and found to be acceptable.

Shift and weekly monitoring of pond and TSF levels is completed to ensure that water levels do not exceed defined operating limits, including the permitted minimum 2-foot freeboard limit. Surface water diversions are also inspected and, if needed, corrective actions are either performed at the time of the inspection or a work order is written. Records were available to demonstrate that freeboard and additional operating parameters were met during the recertification period.

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

Cortez documents their inspections on checklists, daily reports, and specific inspection forms. Inspections results are documented on hard copy forms. Inspection records were available for review during the audit.

The checklists, reports, and forms included the items the inspectors are to observe, the date of inspection, the name of the inspector, and any observed deficiencies.

Corrective measures were noted directly on the inspection records when deficiencies were observed. The auditor 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 entire recertification period.

The Cortez preventive maintenance program has been designed and implemented to ensure that equipment and devices function as necessary for safe cyanide management. Records were reviewed for the recertification period. Preventive maintenance records were readily available and maintenance personnel were very knowledgeable about the need to decontaminate equipment prior to performing maintenance and the dangers associated with cyanide. The records were found to be complete and demonstrated that maintenance personnel have clear instructions and personal protective equipment to perform their work safely. Training and competency certificates for the technicians who perform tank thickness testing were available for review and the maintenance personnel demonstrated excellent knowledge of the equipment and thickness testing task during the interviews.

Cortez has the necessary emergency power resources to operate pumps and other equipment to prevent unintentional releases and exposures in the event its primary source of power is interrupted. Cortez maintains diesel-powered generators to run critical equipment, including solution pumps at Mill 2, Areas 30 and 34, and the TSF in the event of a power outage.

Cortez has not modified their emergency generating capacity since the previous recertification audit. The back-up power supply consists of three 1.6 MW diesel generators at Mill 2, one 2500 kW generator at Area 30, and one 2500 kW generator at Area 34.

The maintenance group performs monthly PMs on the generators. Monthly service includes checks of engine oil, fuel, coolant, and battery fluid levels; operation of the generators for at least 5 minutes; voltage check; and quantity of fuel added during the PM.

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.

Cortez has implemented a program for determining the appropriate cyanide addition rate in Mill 2. Based on discussions with Cortez's Mill Control Room operator, the Metallurgists review the cyanide concentration data and ore chemistry and determine the optimum cyanide addition rates to maximize

gold recovery, but also to minimize cyanide usage. The Metallurgists then provide a targeted cyanide feed concentration to the Mill Control Room operator who then adjusts the cyanide addition rate based on results of manual titrations conducted 3 times per shift by operators at the CIL feed point, CIL tanks #4 and #8, and the cyanide destruct tank.

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.

For the recertification period, Cortez continued to use the GoldSim water balance model that includes the TSF and Areas 30 and 34. All three areas operate independently of each other since no piping connects them together in the field. The GoldSim model is comprehensive in that it includes the appropriate facilities and processes. The model is also probabilistic in that inputs and outputs are distributions rather than single values. This water balance model was in use during the previous Cyanide Code recertification audit. Cortez uses Golder to incorporate changes to the models as needed and to update the model on a quarterly basis. Quarterly updates consist of Golder logging into and downloading Cortez's weather station data and incorporating the recent weather station data and operational data provided by Cortez into the model.

In addition, Cortez maintains a Cell 4 TSF Water Balance spreadsheet to track the pool volume and solids deposition at the TSF. This spreadsheet is updated monthly, or more often as needed. New bathymetric survey data, deposition rates, tails density, and flow meter readings are entered to project pool volume. Decant water volumes, tonnages through Mill 2, and other parameters can be modified to determine the effect of the TSF's pool volume.

Water balance model information was verified through a review of the water balance input data spreadsheets and the GoldSim water balance model and interviews with the Cortez Environmental Department staff.

The WPCPs require Cortez to operate the ponds and TSF in accordance with the operating plans and facility designs reviewed and approved by NDEP, to contain all process fluids within the fluid management systems, and to not release or discharge any contaminants from the fluid management systems. Based on observations and interviews during the site inspection and review of operator shift

reports, the ponds and the TSF are operated with low water levels that maximize available storage capacities.

Cortez's operating manuals provide the capacities, operating levels, and freeboard levels for the heap leach process and stormwater ponds and the TSF and the actions to be taken if certain freeboard levels are reached. Process personnel inspect the ponds and TSF as part of their normal duties.

Cortez has three weather stations that measure precipitation for incorporation into the water balance model for calibration and evaluation. Based on discussions with Cortez's Environmental Department, Golder incorporates the weather station data on a quarterly basis and Cortez has revised operating practices as necessary.

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.

Cortez has implemented effective operational controls to ensure that wildlife, birds, and livestock do not access open waters where weak acid dissociable (WAD) cyanide exceeds 50 mg/l. The barren and solution ponds are covered with bird balls. The Area 30 and 34 process areas and associated ponds are fenced.

Cortez operations personnel routinely inspect for ponding of barren solution on the heap leach pads. When ponding is observed, operators will implement corrective measures to alleviate the ponding and place netting over the ponded areas, if necessary.

Tailings from Mill 2 are treated in a cyanide destruct circuit to reduce WAD cyanide concentrations to less than 50 mg/L WAD cyanide. Based on review of sampling data included in thirteen quarterly WPCP reports submitted to NDEP during the recertification period, the WAD cyanide concentrations in the mill tailings were below 45 mg/L.

During the field portion of the recertification audit, bird balls were observed to be covering the surface in the solution ponds, fencing was observed to be in good condition, and ponding was minimal on the heap leach pads with larger ponded areas covered with bird netting.

Cortez personnel are required to report all wildlife mortalities to the Environmental Department. The Environmental Department submits quarterly Wildlife Mortality Reports to the Nevada Department of

Wildlife (NDOW) that list all wildlife mortalities and the suspected cause of death. The auditor concluded that the operation'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.

Cortez uses an array of trunk lines, piping headers, emitter tubing, emitters (drip heads) and valves to effectively control where barren leach solution is applied. Emitters are used instead of sprinklers to prevent the overspray of solution off the liners.

The Cortez pad crew and process operators monitor the leach pads for ponding as part of their normal daily duties. Based on discussions with the operators, they use a variety of techniques to stop the flow of barren leach solution to areas where ponding is observed so that the ponds quickly dissipate.

Between applying the barren solution with these techniques and daily monitoring for ponding, Cortez applies leach solutions in a manner that avoids significant ponding on the heap leach pads. Significant ponding was not observed on the heap leach pads during the field portion of the recertification audit.

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.

No perennial streams or other natural water bodies are located within the mine permit boundary. In addition, Cortez operates the heap leach operations and TSF as zero discharge processes. Therefore, Cortez does not have any direct or indirect discharges of cyanide process solutions to surface waters.

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.
Cortez has implemented measures to protect groundwater beneath and immediately down-gradient of the operation. Cortez installed and samples groundwater monitoring wells and reviews the analytical data to detect if cyanide seepage occurs. Cortez submits the data to NDEP on a quarterly basis. Cortez'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 Cortez's two WPCPs. In accordance with these permits, Cortez implements inspection and monitoring programs to ensure water management and leak detection systems are functioning properly, and that water quality is protected. Cortez has not modified their groundwater protection measures since the previous Cyanide Code recertification audit report. These groundwater protection measures were observed during the field portion of the 2023 recertification audit and were found to be appropriate and effective. The Nevada Groundwater Standard for WAD cyanide is 0.2 mg/l, which is based on the federal drinking water standards. Cyanide has not been detected in Cortez's groundwater monitoring wells that are closest to their cyanide facilities. The detection limit is 0.01 mg/L, which is below the numerical standard that applies to Cortez. In accordance with their WPCPs, Cortez is required to conduct quarterly groundwater monitoring in monitoring wells located downgradient of the process facilities and in other various locations around the mine site. Samples are collected from the wells and analyzed for a defined list of parameters, including WAD cyanide. Cortez submits the sampling results to NDEP on a quarterly and annual basis. Review of twelve quarterly WPCP reports during the recertification period indicated either no detectable WAD cyanide (i.e., <0.01 mg/L) or concentrations well below the Nevada Groundwater Standard for WAD cyanide in the groundwater monitoring wells located downgradient of Cortez's cyanide facilities. The beneficial uses of groundwater below and downgradient of Cortez's operations include ranching/agriculture and mining and milling uses. Based on a review of monitoring data and discussions with the Cortez Environmental Department, Cortez has not caused cyanide concentrations in groundwater to rise above levels protective of beneficial use. Cortez does not use mill tailings as underground backfill in its underground mine.
The operation is: ☒ In full compliance with ☐ In substantial compliance with Standard of Practice 4.6

NGM Cortez District | Nicole Jung | September 24, 2023

Name of Operation | Signature of Lead Auditor | Date

☐ Not in compliance with

Standard of Practice 4.7

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

Cortez has provided containment for all cyanide unloading, storage, and process solution tanks. Spill prevention and containment measures for the cyanide unloading and storage tanks, CIC circuits, and process solution tanks were observed to be in good condition and the same as described in the previous Cyanide Code recertification audit, except that the west cyanide storage tank at Area 30 had been replaced but was not yet in operation at the time of the field portion of the 2023 recertification audit.

No changes or modifications have been made to the secondary containment areas for the cyanide storage tanks and process tanks or circuits since the previous Cyanide Code recertification audit. The secondary containment areas, including the secondary containments provided for the Mill 2 carbon-in-leach (CIL) tanks and the Area 34 cyanide storage tanks, are sized to hold a volume greater than that of the largest tank within the containment and any piping draining back to the tank, including capacity for a storm event. The auditor observed the containment areas to be in good condition and did not contain debris or extraneous materials that would reduce their capacity during the site inspection for this recertification audit.

Cortez has procedures in place to prevent discharges of any cyanide solution or cyanide-contaminated water that is collected in secondary containment areas to the environment. The concrete secondary containment areas at Mill 2, Area 30 process plant, and Area 34 cyanide storage tanks are equipped with sumps with dedicated pumps to collect and automatically return cyanide solution or cyanide-contaminated water to the process when the level activates a limit switch. Secondary containments for the Area 30 cyanide storage tanks and Area 34 process plant transfer collected liquids to a process solution pond via drainage channels. The Area 30 drainage channel is constructed of concrete and the Area 34 drainage channel is an HDPE-lined channel.

Cortez has provided spill prevention or containment measures for all cyanide process solution pipelines to collect leaks and prevent releases in accordance with their WPCPs. Solution pipelines located outside of concrete containment areas are constructed as either pipe-in-pipe configuration or are located within lined ditches. No changes have been made to the secondary containment measures for the cyanide pipelines since the previous Cyanide Code recertification audit. The auditor observed the spill prevention and containment measures in several locations during the field portion of the 2023 recertification audit and found them to be in good condition.

The auditor observed that Cortez uses carbon steel or stainless steel for cyanide storage 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.

Cortez 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. Modifications to the Cortez cyanide facilities that occurred since the previous Cyanide Code recertification audit include the modification of the Area 30 solution channel to implement wildlife protection measures. This modification included filling the solution channel with perforated piping and drainage rock so that the channel is no longer an open channel covered with bird netting. NewFields Mining Design & Technical Services, LLC (NewFields) provided on-site, full-time field personnel during construction to monitor contractor activities and construction quality control activities and provide construction quality assurance services. The results of the quality control activities and quality assurance services are documented in the *Record of Construction Report: Pregnant Solution Collection Channel Modification Engineering Design Change, Area 30 Heap Leach Facility*, dated July 2, 2020.

A second modification to the cyanide facilities at Cortez was the installation of a cyanide addition point at the cyclone underflow tub in Mill 2. Cortez maintenance personnel installed this line. This project was completed by Cortez personnel, and they implemented a QA/QC program that consisted of pressure testing and leak testing the new cyanide addition line and the Mill Maintenance General Supervisor completed the final inspection of the welds and provided final approval prior to releasing the line to operations. Cortez welders are certified via an outside company (Precision Welding). Certifications were available for review during the 2023 Recertification Audit. In addition, the Mill Maintenance General Supervisor has been in maintenance since 1990 and was a certified welder.

Cortez has maintained copies of QA/QC documentation related to its cyanide facilities. QA/QC documentation was obtained and reviewed for the modification project that was completed since the previous Cyanide Code recertification audit.

Cortez retained qualified engineering personnel to perform the QA/QC inspections and reviews during the modification of the Area 30 solution channel and to prepare and certify final construction reports. The *Record of Construction Report* referenced above provided evidence that qualified personnel, including environmental, health, and safety professionals, reviewed the Area 30 solution channel modification, and the modification was constructed in substantial conformance with the approved project plans and specifications. This report was reviewed and stamped by a Professional Engineer licensed in the state of Nevada. In addition, the *Record of Construction Report* was submitted to NDEP, Bureau of Mining Regulation and Reclamation (BMRR) for review and approval.

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.

Cortez has developed written procedures for monitoring activities, and maintains those procedures in the Nevada Gold Mine LLC – Cortez District Sampling and Monitoring Plan (dated July 1999 and revised in February 2023). Monthly wildlife inspections are documented on the Wildlife Inspection form, which specifies the wildlife protection measures the inspector is to observe at the process areas, solution channels, and leach pads. The Environmental "On-Call Manual" includes a "Wildlife Incident Action Flow Chart" which details reporting requirements, information gathering requirements, preservation, disposal, and investigation protocols.

Based on discussions with Cortez's Environmental Department, all sampling and analytical protocols were developed by appropriately qualified environmental professionals in the Cortez Water Team. The Cortez Water Team is appropriately qualified and consists of an Environmental Manager, three Environmental Engineers, and water sampling technicians.

Cortez's monitoring requirements are detailed in the various sections of the Sampling and Monitoring Plan. The Plan contains a map showing monitoring site locations; describes sampling equipment, containers, labelling, preservation, and shipping; and includes chain of custody procedures. The Plan also includes a Quality Assurance and Quality Control Plan for both field and laboratory methods.

Cortez's sampling technicians use Field Sheets related to each WPCP to document the date, time, and conditions when collecting water samples and to document field parameters and conditions.

The auditor concluded that Cortez conducts monitoring at frequencies adequate to characterize and identify changes in a timely manner in the groundwater, leak detection systems, and process solutions. In addition, the monitoring frequencies have been established by the NDEP in the Cortez WPCPs. Groundwater samples are collected and analyzed, and leak detection systems are monitored on frequencies specified in the WPCPs. Wildlife monitoring is continuous while employees are outside on the property and observations are documented. Cyanide concentrations in process solutions are monitored at least daily and, in many cases, several times per day.
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.
Cortez 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 Cortez Environmental Engineering and Lands Team were interviewed during the audit. The Plan of Operations (NVN-067575 (16-1A) was reviewed and discussed. The Cortez 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) – Reference permits NEV0093109 and NEV2007106. At the time of the audit, the Cortez

team was developing the 5-year concurrent reclamation plan for area 34.

Cortez maintains a comprehensive reclamation and decommissioning schedule that shows ongoing current reclamation activities and proceeding through 2042. 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 Cortez reviews and updates the Reclamation Plan at least every three years, or as needed. The next revision to the Plan is due to be submitted to the regulatory agency later in 2023. Since 2019, there were approximately four or five permit modifications. Each modification was approved and included updates to the bond. The most recent revision showed an October 25, 2022 approval date and a bond increase associated with the minor modification for a haul road to the Gold Acres area and the relocating of fiber optic lines.

The Life of Mine calculations were also available for review and confirmed that closure plans and related details and calculations are being maintained up to date, and revisions approved by the State, as required.

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.

Cortez 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 Cortez Gold Mines NVN-067575 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 Cortez Gold operations. The cost estimate has been reviewed and approved by the Nevada Bureau of Mining Regulation and & Reclamation and the BLM and Cortez has correspondence from the BLM.

Cortez 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. The Life of Mine Plan was available for review and was found to be current. 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.

Cortez complies with regulations and has established a financial mechanism approved by regulators to cover the estimated costs for cyanide-related decommissioning activities as identified in its reclamation and closure plans.

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.

Cortez has developed and implemented SOPs, critical task procedures, and other procedures that describe the management and operation of its cyanide facilities. These procedures cover the safe operation of the cyanide management facilities, decontamination of cyanide equipment prior to maintenance work, and entry into confined spaces. These documents describe PPE requirements, operator responsibilities, and procedures for using and handling cyanide.

Verification of the written procedures included review of the SOPs and worker interviews. The procedures and plans have been updated as needed.

Based on review of multiple SOPs during the 2023 recertification audit, Cortez's SOPs require that a Field Level Risk Assessment and a work area inspection are completed before a task is performed.

The operation considers worker input into the development of health and safety procedures through various mechanisms and implements an open-door policy for employees to provide input into operations including health and safety matters. Additionally, Cortez solicits worker concerns and comments on safety issues during safety training, safety meetings, and daily line out meetings. Safety meetings are documented and reviewed.

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.

Based on discussions with Mill operators and the Mill control room operator, the targeted setpoint for the Mill CIL circuit pH is 11 to limit the evolution of hydrogen cyanide gas. The auditor viewed several digital displays in the Mill and above the CIL tanks and all pH readings were observed to be greater than 11.

For Areas 30 and 34, the targeted pH is between 9.5 and 10.5 to limit the evolution of hydrogen cyanide gas. Cortez can increase the pH on the leach pads and in the CIC circuit when actively hauling ore by adding pebble lime to the ore in the haul trucks before the ore is placed on the heap leach pads. Cortez continues to test various methods for increasing the pH in the CIC circuit when ore is not being placed on a pad.

Cortez has identified the following areas where workers may be exposed to hydrogen cyanide (HCN) gas: Mill 2 and CIC/process buildings at Areas 30 and 34. Fixed, ambient HCN monitors are located within these areas, and this was confirmed through observation during the field portion of the 2023 recertification audit. These monitors have an initial alarm set at 4.7 ppm and a high-level alarm set at 10 ppm. Workers completing tasks that have the potential for worker exposure to HCN, such as opening equipment that contained cyanide, use portable HCN monitors. Required PPE when performing cyanide-related tasks is specified in Cortez's SOPs.

Cortez has installed fixed, ambient HCN monitors for confirmation that controls are adequate to limit worker exposure to HCN gas. Fixed HCN monitors were observed during the field portion of the 2023 recertification audit in multiple locations in the Mill 2 building and in the Area 30 and 34 CIC buildings. 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.

Gas Badge Pro Industrial Scientific portable HCN monitors are available for use by operations and maintenance personnel during normal operation or when performing specific tasks, such as replacement of a cyanide transfer pump. These portable monitors are set to alarm at 4.7 ppm and 10 ppm and are automatically bump tested when set in their docking stations. The monitors are also calibrated automatically monthly using the same docking system.

Hydrogen cyanide monitoring equipment is maintained, tested, and calibrated monthly, as directed by the equipment manufacturer. Records were reviewed and were found to be complete for each month of the three-year recertification period. Technicians utilize the Maintenance Work Order system and record the condition of the equipment and any repairs or sensor replacements that needed to be done.

The Safety and Health Department maintains the MX-6 Multi-Gas monitors and Industrial Scientific GasBadge Pro monitors. The MX-6 Multi-Gas monitor instruments and the GasBadge Pro monitors are equipped with a docking station that tracks, performs, and records monthly calibrations.

The Cortez Electrical and Instrumentation Department maintains stationary HCN monitors and alarm systems in all areas where cyanide is introduced in a concentrated form. Monthly calibration records were available for stationary HCN monitors. Records were found to be complete for the recertification period.

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 and were readily visible and in good condition.

Signs were located at the doors stating that “All process solution contains cyanide”. Other areas of the facility, such as the cyanide off-load areas, included signs identifying the presence of cyanide and state “No Eating, No Drinking, No Smoking, and No Tobacco Products.” 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.

Signs stating that process solutions contain cyanide were posted at entrances to the heap leach facilities and the tailings storage facility. Signage was found to be appropriate for the operation.

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 for the sodium cyanide delivered to site was reviewed and indicates the solution is dyed.

Cortez has installed safety showers, eye wash stations, and fire extinguishers at strategic locations throughout Mill 2, Area 30, and Area 34 buildings where a potential for exposure to cyanide exists. These items were observed throughout the buildings and in the cyanide unloading and storage tanks areas at Mill 2 and Areas 30 and 34. A sample of safety showers and eyewash stations were checked during the site inspection and found to be operational. In addition, portable eyewash stations are available to place near specific tasks if operations or maintenance personnel prefer to have a station right next to the work area.

Operators are required to complete the *Cyanide Offloading Check Off Sheet* prior to unloading each cyanide shipment. This form documents that the truck driver tested the eyewash and safety shower in the unloading area to ensure they are functional prior to offloading cyanide. The operation and cleanliness of eyewashes and safety showers throughout the process areas where cyanide is used are checked and documented on a daily basis.

All fire extinguishers in and around the process areas and cyanide unloading/storage tank areas were visible, inspected as verified by observation of inspection tags on each extinguisher, and observed to be

ABC dry chemical extinguishers. Fire extinguishers are visually inspected monthly and hydrostatically tested every three years.

Cortez has identified all tanks and pipes 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 on pipes. Although most areas were appropriately marked, several areas were noted during the site inspection where piping did not have adequate signage or where flow direction was not shown. During the site inspection, Cortez added labeling where needed. The audit team found the additional labeling acceptable and deemed that no further action was required.

Safety Data Sheets (SDS) and SOPs are maintained on a computerized system accessible to Cortez employees through any computer terminal on the Nevada Gold Mines network. Based on demonstrations and interviews with operators and during the field portion of the audit, they were able to access the SDSs from computer terminals in the control rooms and employees who do not have access to the computer terminals said that they would request a copy of a SDS from their Supervisor when needed. SDSs and SOPs are available in English, which is the language of the workforce.

Nevada Gold Mines (NGM) has developed and implemented a *Supervisor Incident Guide* at all its mine sites, including Cortez. The Guide provides a systematic means for initially responding to an incident, includes notification requirements, how to investigate, and how to enter the incident into NGM's environmental, health, and safety data management system (Isometrix). The Guide also includes a *Supervisor Incident Checklist*. This Guide requires all employees to report all incidents to their direct Supervisor immediately. All significant incidents, which includes workplace injuries, cyanide exposure or releases, are required to be investigated using the *Incident, Cause, and Analysis Method* (ICAM).

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 EHS 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. Actions reviewed were closed out as complete. The auditor concluded that the NGM investigation procedure is implemented and effectively used by Cortez 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.

First aid kits, including oxygen, a resuscitator, and antidote kits (Cyanokit®) are maintained in or near cyanide-related areas. Kits are available in the Assay Lab, Mill 2 Control Room, Area 30, Area 34, and Control 2 (ambulance). The availability of the emergency kits and the validity of the antidote expiration dates were confirmed during the audit.

Radios and cellular mobile phones are the primary forms of communication throughout Cortez. Stationary telephones are available for use in the control rooms and most electrical rooms. Operators also carry a radio that allows them to communicate on a normal basis and to broadcast an emergency notification.

The emergency response team checks the Cyanokits, emergency response kits, and emergency response vehicles (ambulances) monthly. Cyanokits are stored in a manner that is consistent with manufacturer recommendations, in temperature-controlled settings. The antidote was found to be current and in-date. According to interviews, the monthly inspections are checking for condition and for expiration of the antidote. Records were sampled from the recertification period and were accepted by the auditor.

Cortez maintains the "Cyanide Emergency Response Guidelines" that details specific emergency response actions for a response to cyanide exposure and/or suspected cyanide exposure. Specific steps and actions to be taken in the case of a mild poisoning versus a moderate or severe poisoning are detailed in the document. The document includes information about transporting a cyanide exposure victim to the Northeastern Nevada Regional Hospital in Elko. There is also information in the emergency plans for transporting an exposure victim by air medivac, if necessary.

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.

Cortez maintains its own on-site capabilities to provide first aid and medical assistance to workers exposed to workers. The current roster of emergency responders includes Advanced Emergency Medical Technicians (AEMT). Certified AEMTs can administer the intravenous antidote. There is an AEMT and other 4-10 emergency responders assigned to each of the four shifts for surface response. Additional personnel are assigned for underground response and those individuals can also respond to a surface emergency, as necessary. A registered nurse is also onsite four days per week.

The mine has two fully equipped ambulances available to transport workers exposed to cyanide to a medical facility, if necessary.

Cortez reconfirms on a regular basis that the Northeastern Nevada Regional Hospital (NNRH) in Elko is ready and willing to accept cyanide exposure victims. The most recent letter on file is dated September 14, 2022. The letter confirms that the hospital has trained staff and antidote to treat potential cyanide

exposure victims and that these services are available to NGM.

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 MOU, according to the document itself, is distributed to the Fire District Chief, the county Emergency Medical Service Coordinator, the Sheriff, the volunteer fire department, Cortez Safety & Health Manager, and the Emergency Response Superintendent at Cortez.

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.

Cortez maintains several emergency response plans to respond to all possible emergency scenarios, including possible cyanide exposures and/or accidental releases to the environment. 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 such as uncontrolled seepage, rapid deformation of embankment, and dam breach

The auditor confirmed through interviews with emergency response personal 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 Cortez Emergency Response Guidelines discuss actions to be taken for cyanide spills on- and offsite.

The emergency response plans were found to be sufficiently detailed with specific response actions included. The plans describe the response actions required for multiple scenarios, including cyanide release and exposure. The need to evacuate personnel from an incident area is included in each of the relevant scenarios. Potentially affected community notification details are in the Tailings Emergency Action Plan (EAP). The Emergency Notification Flowchart contains all necessary telephone numbers and instructions on a detailed decision flowchart.

All the emergency plans call for stopping cyanide releases at their source. The Solid and Hazardous Waste Management Contingency Plan and the Tailings EAP detail containment, risk and impact assessment actions, and the need for causal analysis to ensure that corrective actions mitigate the risk of future releases.

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.

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

The Emergency Response Team (ERT) Leader reviews the emergency plans with the team on at least an annual basis and training on different emergency response topics is ongoing. All ERT members have a chance to provide input to the response procedures contained in the emergency procedures during debriefs/critiques after a drill or actual event. Cortez personnel interact with Local Emergency Planning Committee (LEPC) members in the surrounding counties. LEPC interactions were very limited during the pandemic years, but this is a common situation and was accepted by the auditor. Responsibilities for interacting with local communities and the LEPC specifically are in the Solid and Hazardous Waste

Contingency Plan.

NGM maintains a memorandum of understanding (MOU) for emergency services between Eureka County and NGM. The MOU, according to the document itself, is distributed to the Fire District Chief, the county Emergency Medical Service Coordinator, the Sheriff, the volunteer fire department, Cortez Safety & Health Manager, and the Emergency Response Superintendent at Cortez.

Cortez interacts with the community through LEPC interactions, safety breakfast meetings, and through authority emergency planning interactions. The most extensive and formal interaction with stakeholders is through the formal permitting of the Emergency Action Plan for the Cortez Mine Area 28 Tailings Storage Facility (TSF). The Plan is relatively new and was published on March 29, 2023. A Cyanide Safety Breakfast Community Meeting was held in 2022.

The Cortez emergency plans designate responsibilities of offsite responders and include the need to notify them and communities if there is an incident. Cortez also works closely with the Northeastern Nevada Regional Hospital (NVRH) to ensure they have the proper antidotes for a cyanide incident present at their facility and have agreed to assist with any cyanide victim when they enter their facility. The most recent reply letter from the hospital is dated September 14, 2022.

The hospital annually acknowledges that the emergency room staff does know the proper procedure for treating cyanide poisoning and that they have the Cyanokit antidote.

The operation also conducts emergency response drills annually and includes representatives from other local mining companies as well as TransWood and Cyanco periodically.

Cortez Corporate Social Responsibility (CSR) personnel engage with the community and stakeholders on a continual basis. The CSR team maintains a Stakeholder Interaction Log and has logged more than 150 community interactions each of the years of the recertification period. Interviews confirmed that any information gathered through the Stakeholder Engagement Process that has relevance to emergency planning would be reported to the ERT Leader to ensure that local conditions are maintained as current in the emergency plans. Each of the emergency planning documents reviewed during the audit was last updated in 2023. All information was found to be up-to-date and relevant.

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 Cortez emergency response plans were found to be appropriate for the operation. The plans address Cyanide Code requirements, as follows:

a) The Cortez Surface Emergency Response Plan discusses the response procedures and protocols through classification of an incident (Level 1 through Level 3) in which the degree of the incident is escalated. The plan includes a description of roles and responsibilities of ERT leads and directs users to also follow the Incident Command Center Standard, which establishes authorities of primary and backup incident commanders.
b) Cortez maintains an up-to-date roster of available Emergency Response personnel who are allocated to each shift. The training/skills of each person are listed in the roster and the role of the person on the team is clearly stated.
c) Emergency response training performed for ERT members on an annual basis. The training records for ERT and other types of training modules and certifications are maintained.
d) 24-hour emergency call-out information is maintained in the ERT roster. The Surface Emergency Response Plan (ERP) details the call out and Emergency Incident Commander procedures.
e) Detailed role and responsibility information is available in each of the emergency plans.
f) Cortez has a complete set of response equipment available and ready for use throughout the operation. The ERP includes a list of required response equipment, including PPE.
g) All emergency equipment, vehicles, and antidote kits are inspected monthly. Records from the recertification period were sampled and found to be acceptable.
h) Outside hospital personnel are trained in the use of all antidotes and they are aware of their anticipated roles needed in the treatment of cyanide exposed victims as confirmed through letters correspondence between the hospital NGM.

Outside hospital personnel are trained in the use of all antidotes and they are aware of their anticipated roles needed in the treatment of cyanide exposed victims as confirmed through letters correspondence between the hospital NGM. The most recent hospital letter is dated September 14, 2022. Joint emergency response drills are also held with other NGM operations and with Cyanco and TransWood.

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 emergency response plans have the notification decision flow maps and contact information included for notifying management, regulatory agencies, other NGM mines, the hospital, and the air medivac company, as necessary. The emergency plans include procedures and contact information for notifying potentially affected communities of the cyanide related incident and any necessary response measures and for media communications. The plans designate the Corporate Social Responsibility Specialist as the contact person with the media if there is media contact. According to interviews, statements have been drafted for different types of possible scenarios. The ICMI notification procedure is contained within the Solid and Waste Contingency Plan. The environmental department is notified if any type of cyanide-related incident occurs. The Contingency Plan is very detailed and includes the need to contact ICMI within 24 hours if a significant cyanide incident occurs. The phone and email contact information for ICMI are also in the plan. There were no significant cyanide incidents during the recertification 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 Cyanide Emergency Response Plan (ERP) and the Surface ERP both detail recovery and neutralization of solutions and solids. Once the contaminated material is collected, the Solid and Hazardous Waste Contingency Plan contains details regarding notifications to authorities and waste disposal requirements. The ERPs include procedures on the recovery of materials that have been contaminated with cyanide solution. Liquids from a cyanide spill that occurs within a secondary containment area are to be pumped to a truck, or other large vessel, or a lined process pond. Cyanide contaminated soil would be excavated and placed on an active heap leach pad. According to interviews, contaminated materials including contaminated equipment and clean-up debris would be decontaminated under the direction of the Environmental Department. Any materials that are suspected of still being contaminated are disposed of as hazardous waste according to the Solid and Hazardous Waste Contingency Plan. The risk of contaminating drinking water wells is low, but interviews with ERT members indicated that bottled water

would be brought in for internal and external stakeholders if a catastrophic release impacted drinking water supplies.

The Surface ERP states that "Hypochlorite solutions, Hydrogen Peroxide Solution or ferrous sulfate shall not be used when spills have reached flowing water bodies."

Interviews indicated that if a cyanide spill occurred outside of containment that the Cortez Environmental Department would be required to do soil sampling to verify that no residual cyanide remains in the affected area. This is addressed in environmental permits.

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 emergency plans have maintenance sections within them that require hands on drills and a review of the plan following the drill or actual deployment of the plan. This is required to be done annually.

Mock cyanide emergency drills were run in the mill and heap leach areas on each shift twice per year throughout the recertification period. Drills included cyanide exposure and environmental release scenarios. Due to the pandemic, no site-wide drills were performed in 2020 or 2021. A cyanide exposure and environmental release hands on drill was completed on September 1, 2022. This drill involved deployment of the ambulance and the ERT. The drill performance was evaluated after the drill. On April 4/28/2022, Cortez conducted another drill related to mass casualties needing to be transported to the hospital. The drill was organized with the County and included external emergency responders, two helicopters, several ambulances, 28 victims, and transport to the hospital.

A full hands-on drill is to be conducted annually according to the ERP. A gap in sitewide drills occurred during the pandemic in 2020 and 2021 (mentioned above), but sitewide drills resumed in 2022 and a TSF-related drill is planned for 2023. The Surface Emergency Response Plan calls for the updating of emergency plans, as necessary following drills and actual emergencies. No cyanide-related incidents occurred during the recertification period, but minor issues that were noted after drills were addressed through revisions to the emergency response plans, all of which were revised in 2023.

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. The cyanide hazard recognition training materials were available for review during the audit. The training was found to adequately address the type of cyanide present at the operation (solution), the health effects of cyanide, the symptoms of cyanide exposure, and the procedures to follow in the event of exposure.

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. Cortez is using a very creative and unique method to engage personnel in the annual cyanide refresher training. These practices were noted by the auditor as appearing to be quite effective and innovative.

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.

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.

On the Job (OJT) training is given to all employees who work in the production areas, those who oversee cyanide solution unloading, and those who perform maintenance activities. A Mill Progression Training Tracker spreadsheet is used to track training needs and completion. A Heap Leach Progression Training Tracker is also used. These documents were well organized and complete. Personnel are observed to be competent in the tasks they are assigned before approving them for independent work. Cyanide safety and safe operations, such as decontamination of equipment prior to performing maintenance, are part of

the training program.

Cortez uses Process Operations Progression Training Checklists to identify specific training elements. The Heap Leach and Mill Progression Trackers were reviewed during the audit and were found to be complete. Interviews indicated each job has specific procedures and skills identified for it.

Trainers are MSHA Blue Card holders with many years of experience in the topics that they are teaching. Blue Cards for all trainers were available for review.

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 new miner MSHA training for a week in town prior to coming to the mine to work.

Refresher training on cyanide management skills is given annually. The training on the procedures and tasks (e.g., driving specific equipment types) is given in the context of a progression format. Employees go through a process of re-training and re-testing on more and more advanced skills in order to be promoted to higher levels and compensation.

Testing is given for all types of training. The signature from the trainer / supervisor at each level of progression affirms that the person was found to be competent through testing and/or skills demonstration.

Training records were found to be complete. Records are retained throughout the individual's employment and indicate the names of the employee and trainer, the date of training, the topics covered, and confirmation that the employee demonstrated the necessary competencies associated with the training content.

Operator training records were sampled and all procedures and critical tasks that are reviewed with an employee are also kept in their files as proof that training occurred. All tests and associated MSHA 5000-23 forms are also maintained and uploaded into electronic format. The files are only destroyed after the employee leaves the company. The 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 personnel are trained annually on cyanide safety training which includes refresher training on the procedures to be followed if cyanide is released, including decontamination and first aid procedures. The refresher training was available for review during the audit and includes information regarding the required responses to cyanide exposures and releases. Records were sampled from the recertification period and were found to be complete. Based on discussions with the ERT Lead and a review of the ERT Roster and Attendance tracker, members of the ERT are trained in emergency procedures and the use of emergency equipment. Emergency Response personnel are trained monthly by internal and external trainers. Training topics include but are not limited to CPR/AED (cardiopulmonary resuscitation/automated external defribrillator) use, hazardous materials and spill response training, cyanide decontamination, potential cyanide poisoning response, and 40-hour initial or 8-hour refresher HAZWOPER training. Drills are also used to evaluate the effectiveness of training and the need for adjustment to plans and/or training approach. 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. Cyanide Emergency Response Training records include the names of the employee and the trainer, the date of the training, topics covered, and a sign-off demonstrating how the employee demonstrated an understanding of the training materials. Employees generally demonstrate an understanding of the training materials through testing or skill demonstration. Records for the recertification period were available for review and were found to be complete.
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.

Cortez 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 breakfast meeting with the community. The Producer, Cyanco, was invited to discuss cyanide safety and the use of cyanide at the mine.

Cortez personnel meet with the communities of Battle Mountain, Crescent Valley, Pine Valley, Elko, as well as the Shoshone Tribal Communities in the area on a regular basis, typically quarterly or bi-annually. At these meetings public officials and public members are presented with information related to Cortez which includes discussions of cyanide transport and other issues that can affect these communities. The Stakeholder Engagement Log was reviewed, and the CSR was interviewed. No cyanide-related concerns have been voiced by the community in recent years.

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.

Cortez maintains written descriptions of how its activities are conducted and how cyanide is managed. This information is in a PowerPoint slide deck that is presented at a stakeholder meeting at least annually and is available to stakeholders in written format. Cortez maintains a detailed Stakeholder Communication Plan where the strategy for communication is defined for each stakeholder. Besides inviting all stakeholders to have open dialogue, Cortez also invites stakeholders to the site for annual meetings, site tours, and other events. According to interviews and a review of presentation materials, issues such as cyanide management practices, potential environmental, health, safety (EHS) concerns and controls used by the mine for managing these concerns are including during stakeholder interactions.

Although verbal communications during tours and community outreach events are common, the local population is literate.

The Cortez WPCPs 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, Cortez is required to complete MSHA reports that would include any cyanide related worker exposure or death. These records are also available to the public.

The Nevada Division of Environmental Protection makes information regarding incidents publicly available but 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 incidents (cyanide or otherwise) pertaining to this operation for the recertification period.

Operational and environmental information is provided in the Barrick corporate annual report and on NGM website: https://www.barrick.com/English/investors/annual-report/sustainability/default.aspx The Annual Report contains specific information regarding which mines were involved in fatalities. The environmental information is cumulative for the corporation reported that there had been no “Class 1” (high significance) environmental incidents, and two “Class 2” (medium significance) environmental incidents in 2022. Neither of these incidents occurred at the Cortez operation. No incidents of off-site releases, exposure or other reportable incidents relating to cyanide have occurred during the recertification period.

This information was confirmed through interviews with the CSR, EHS 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