ICMI Cyanide Code Gold Mining Recertification Audit

Summary Audit Report

Nevada Gold Mines, Turquoise Ridge Complex

Nevada, USA

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

2023 Audit Cycle

15929 Avenida Venusto, Apt. 225,
San Diego,
CA, 92128, USA
www.smartaccess.us

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Mining Operation: Turquoise Ridge Complex

Mine Owner: Barrick Gold Corporation

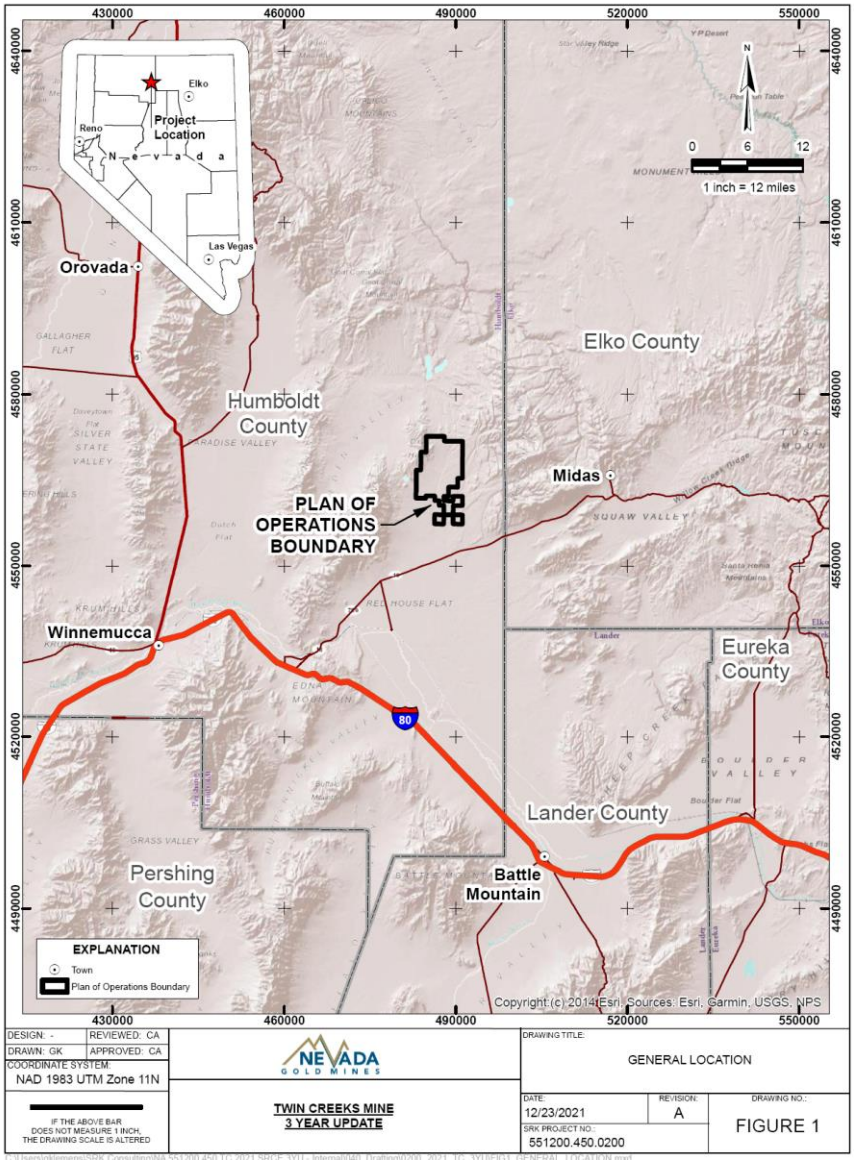
Mine Operator: Nevada Gold Mines

Name of Responsible Manager: Julius Stieger, General Manager

Address and Contact Information:
Turquoise Ridge Complex
2055 Getchell Mine Road
Golconda, NV
89414, Unites States of America
Tel: +1 (775) 388-0294
julius.stieger@nevadagoldmines.com

Location and description of the operation

The Turquoise Ridge Complex (TRC) location is presented in the picture below:



Nevada Gold Mines (NGM) operates the TRC, located in Humboldt County, Nevada, approximately 35 miles north of the town of Golconda. NGM is a joint venture between Barrick Gold Corporation (Barrick) and Newmont Corporation (Newmont). Barrick is the operator of the

joint venture and owns 61.5 percent (%), with Newmont owning the remaining 38.5%. Under the joint venture, Barrick Turquoise Ridge Mine and Newmont Twin Creeks Mine were combined in July 2019 as a single operation, now known as TRC. Currently, only mining activities occur at the former Barrick Turquoise Ridge Mine, with the mined ore being hauled out and processed at the former Newmont Twin Creeks Mine. This audit covers the former Newmont Twin Creeks Mine, hereafter referred to as TRC.

TRC's facilities that were part of the former Newmont Twin Creeks Mine consist of an open pit mine; overburden piles; topsoil stockpiles; tailings impoundments; heap leach facilities (HLF) including the carbon-in-column (CIC) circuits; sulfide and oxide milling facilities including the carbon-in-leach (CIL) circuits, strip and gold recovery circuits; administration buildings; maintenance facilities; and access and haul roads.

Sulfide ore is milled in the Sage Mill and then conveyed to the autoclave for rapid oxidation of the sulfide minerals. The oxide ore from the Juniper Mill is mixed with the sulfide ore from the Sage Mill (autoclaves), then adjusted for pH in the Neutralization Tanks, then sent to the CIL train for cyanide addition and leaching. The spent material is treated by a Caro's Acid Plant for cyanide reduction prior to deposition in the Juniper tailings storage facility (TSF). The Juniper/Sage Mills receive ore for processing from other mining operations. TRC has a closed Piñon TSF and mill in the southern portion of the project area referred to as the Piñon Mill. The Piñon Mill was inactive at the time of the audit. The Piñon TSF has been decommissioned by removal of process water from the surface and placing a vegetated cover over the impoundment and has not been included in any of the previous recertification audits.

The heap leach circuit consists of three heap leach facilities in the northern portion of the site area (Izzenhood/L8, Snowstorm, and Sonoma) and one heap leach facility in the southern portion of the project area (Osgood). Izzenhood is the only active heap leach facility on site during the recertification period. Ore placement at the Osgood leach pad was discontinued in January 2013 and the pad is in closure. The heap leach facilities and associated ponds are permitted as zero-discharge facilities. The heaps drain to a series of intermediate and pregnant ponds. Solutions from the pregnant ponds are pumped via pipeline to the CIC gold recovery circuits. The major components of the processing facilities are as following:

North Area:

- Cyanide offloading and storage facilities (Sage/Juniper Mill and South Pond)
- Sage and Juniper Mills (including CIC and CIL tanks)
- Caro's Acid Plant
- Leach pads (Snowstorm [phases N1 and N2], Sonoma [phases N3-N5], Izzenhood/L8 [phases S1-S5]). No irrigation has occurred at the Snowstorm and Sonoma leach pads over this recertification period.
- Pregnant Pond
- Intermediate Pond
- South Pond (previously the Barren Pond). This pond is now used as a contingency pond.

- Events ponds (major, minor and N5)
- Juniper TSF (until Stage 11)
- North Reclaim Pond (was only in use until April 2019)
- Cutoff trenches and seepage collection wells associated with the Juniper TSF
- Flush Pond
- Diversion channels

South Area:

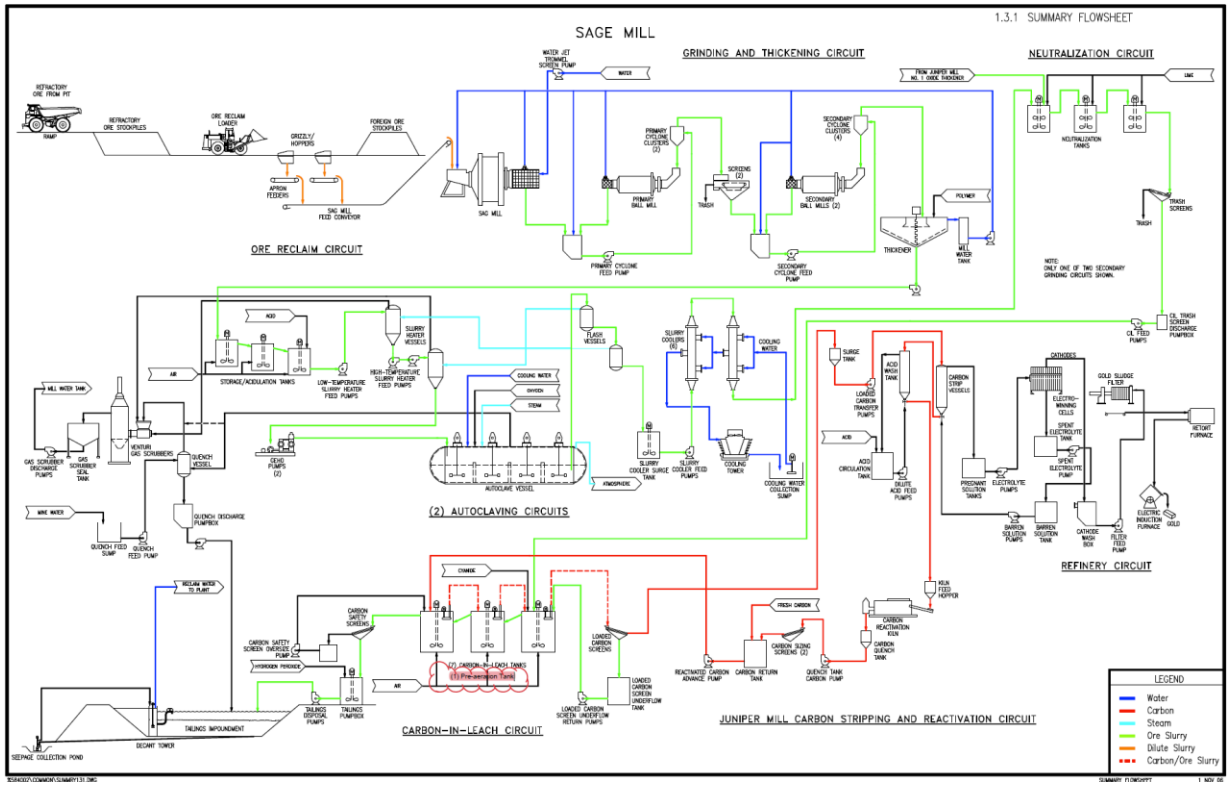
- Cyanide offloading and storage facility (Piñon Mill) (inactive for the recertification period)
- Piñon Mill (Inactive at the time of the audit)
- Leach pad (Osgood). No longer a cyanide facility (Weak Acid Dissociable [WAD] cyanide concentrations were below 0.5 milligrams/liter (mg/l) over the recertification period).
- Barren Pond. No longer a cyanide facility (WAD cyanide concentrations were below 0.5 mg/l over the recertification period)
- Pregnant Pond. No longer a cyanide facility (WAD cyanide concentrations were below 0.5 mg/l over the recertification period)
- Intermediate Pond. No longer a cyanide facility (WAD cyanide concentrations were below 0.5 mg/l over the recertification period)
- Diversion channels

The scope of the recertification audit at TRC includes only facilities in the North area, as the South area did not have any facilities with WAD cyanide concentrations above 0.5 mg/l for the recertification period. The following cyanide facilities from the North area are included in the scope of the audit: Process plant facilities including Sage and Juniper Mills, CIL tanks, CIC tanks, barren and pregnant tanks, cyanide offloading and storage facilities (Sage/Juniper Mill and South Pond), and Caro's acid plant. The scope also includes the tailings pipeline corridor, Juniper TSF Cells 1, 2 and 3, cutoff trenches and seepage collection wells, Izzenhood/L8 leach pad (phases S1-S5), pregnant pond, intermediate pond, south pond (previously the barren pond) and the events ponds (major, minor and N5). There are no treated cyanide water discharges to the environment at TRC.

Liquid cyanide at 30% concentration is delivered at TRC in tanker trucks at two locations: Juniper/Sage mills and South pond. Cyanide is stored in cyanide tanks before it is distributed for use in the production facilities.

The only new facility constructed and put in operation since the 2020 recertification audit is Stage 11 of the Juniper TSF.

The TRC process flowsheet is presented below:



Auditor's Finding

The International Cyanide Management Institute (ICMI) approved Audit Team verified that the Turquoise Ridge Complex is in **FULL COMPLIANCE** with ICMI Cyanide Code requirements for Gold Mining operations.

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

The Turquoise Ridge Complex has experienced zero significant cyanide incidents during this 3-year recertification audit cycle.

This operation was determined to be in FULL COMPLIANCE with the International Cyanide Management Code.

Auditor's Attestation

Audit Company:	SmartAccEss Socio Environmental Consulting, LLC
Lead Auditor:	Luis (Tito) Campos E-mail: titocampos@smartaccess.us
Mining Technical Auditor:	Adam House Email:adam.house@patersoncooke.com
Date(s) of Audit:	September 25th – 28th, 2023

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

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

Turquoise Ridge Complex		January 30th, 2024
Name of Operations	Signature of Lead Auditor	Date

Nevada Gold Mines -
Turquoise Ridge Complex

Signature of Lead Auditor

January 30th, 2024

SUMMARY AUDIT REPORT

1. PRODUCTION AND PURCHASE: Encourage responsible cyanide manufacturing by purchasing from manufacturers that operate in a safe and environmentally protective manner.

Standard of Practice

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

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

Discuss the basis for this Finding/Deficiencies Identified:

Nevada Gold Mines has a sales agreement to purchase sodium cyanide from Cyanco Company, LLC. The contract does not stipulate that Cyanco maintain certification under the Code; however, it was verified by reviewing the ICMI website and latest summary audit report that Cyanco is currently certified. Cyanide was only purchased from Cyanco during the recertification period.

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

Standards of Practice

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Written agreements for transportation requirements were in place under the supply contract with Cyanco during the recertification period. The cyanide purchase contract includes the cyanide manufacturer's (seller) responsibility on delivering the product to the mine´s site using only ICMI certified transporters.

The seller's transportation supply chain is currently certified under the Cyanide Code. The supply chain includes truck transportation by TransWood from the Winnemucca Terminal to Turquoise Ridge.

No interim storage takes place between the production facility and the storage tanks at the mine site. Bills of Lading for cyanide deliveries show that the cyanide was produced by Cyanco and transported by TransWood to Turquoise Ridge, and TransWood is the sole transporter of cyanide to the site.

Safety and maintenance of the means of transportation throughout transport is the seller's responsibility, as well as task and safety training and emergency response for the seller's transporters throughout the process. Security is addressed as part of TransWood's ICMI certification.

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

Standards of Practice

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

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

Discuss the basis for this Finding/Deficiencies Identified:

TRC has two active cyanide offloading and storage facilities located at Juniper/Sage mill area and at the South Pond area that were designed and constructed in accordance with sound and accepted engineering practices. This was verified during the initial certification audit for the Twin Creeks Mine. No changes or modifications have been made since the initial audit and subsequent recertification audits. There is an additional cyanide offloading area at the Piñon mill, but it is outside of the scope of the audit as it has not been in operation for this recertification

period. As indicated in previous recertification audit reports, the Juniper/Sage mill cyanide offloading and storage facility has three cyanide storage tanks: two Sage tanks (each with a capacity of 25,000 gallons) and one Juniper tank (with a capacity of 10,000 gallons). One of the Sage tanks was offline for maintenance during the site visit. The South Pond cyanide offloading and storage facility has a storage tank with a capacity of 25,000 gallons. The cyanide offloading facilities at Juniper/Sage mill was designed by consulting firm Kilborn, and the one at the South Pond was designed by consulting firm Davy McKee. Design and drawings for the cyanide offloading systems have been retained from the initial certification audit and were available for review by the auditors. The field component of the audit confirms that the cyanide tanks at both locations were built on concrete hardstanding maintained in good condition. Cyanide tanks were located within containment concrete berms, which are sized to contain at least 110% volume of the tank. The cyanide tank areas are also subject to daily inspections at shift start to detect any obvious releases or failure in containment.

The Juniper/Sage and South Pond offloading and storage facilities for liquid cyanide are located outside of the mills far away from communities and surface waters. These facilities remain substantially unchanged since the initial certification audit and subsequent recertification audits. These facilities are not located near any offices or places where workers might congregate. Fixed HCN monitors are installed at each of the cyanide offloading and storage areas. All personnel with access to the offloading and storage facilities, including contractors, receive site specific health and safety training. All these measures minimize the potential for human exposure. Appropriate warning signage is placed at these facilities to alert operators of cyanide presence and hazards associated with it. Although the offloading and storage facilities are not within their own fenced areas, they are located within the fenced and secured areas of the mine where public access is controlled. TRC is located in an arid area and there is no surface water in the vicinity. Rabbit Creek is the closest surface water body, which is approximately 3 miles away from TRC. The offloading platforms at both locations drain inside the secondary containment of the cyanide tanks. Any release from the cyanide tanks will be contained within the secondary containment and pumped back to the system. The Juniper/Sage cyanide tanks secondary containment has a sump to collect any leakage and a pump to return it back to the system, while the South Pond cyanide tank is located adjacent to the intermediate pond, which acts as a large containment area for the tank.

TRC offload areas have concrete pads for the trucks carrying liquid cyanide. These pads are constructed with cast-in-place reinforced concrete to prevent seepage to the subsurface. They are sloped to the secondary containments of the cyanide tanks to collect any potential spillage during offloading. These areas are inspected monthly to detect any deficiencies.

Cyanide storage tanks for liquid cyanide at Juniper/Sage and South Pond areas have ultrasonic level indicators and high-level alarms installed. These levels are continuously monitored from the mill control room. Arrangements remain unchanged since the previous recertification audit. The offload standard operating procedure (SOP or procedure) is designed to prevent overfilling the tanks. The operators verify that the tank levels are low enough to receive the expected

delivery. In addition, the cyanide supplier, Cyanco, has remote telemetry monitoring of the cyanide tank levels to track cyanide usage and inventory, allowing them to dispatch cyanide loads when needed. The cyanide delivery driver is required to verify the tank level prior to offloading. No cyanide liquid offload will be allowed if tank levels are greater than 65%, 70% and 18% for the South Pond, Sage, and Juniper cyanide tanks, respectively. Tank levels before and after cyanide offloading are documented in Cyanco's bills of lading. There is an audible and visual high-level alarm on each cyanide tank, which is set at 95%. There are also level indicators at the tanks with visible alarms that are inspected visually during the cyanide offloading process. The level indicators in the cyanide tanks are continuously monitored to ensure they are operational. The auditors observed screenshots in the control room showing that the level indicators were functioning correctly. In addition, TRC has SOP "Process Spills in Cyanide Secondary Containment" that addresses inspection, identification and response for the cleanup or recovery of leakage. The reliability and the functionality of the level alarms are maintained through checks of tank level, checks for the offloads, and routine testing and monitoring by the operations.

The cyanide storage tank areas remain substantially unchanged since the initial certification audit and subsequent recertification audits. Cyanide storage tanks are secured to solid, reinforced concrete pedestal-type foundations and are contained within concrete berms with concrete flooring that are an adequate barrier to prevent seepage to the subsurface. The tanks, berms and containment areas are subject to daily inspections at the beginning of each shift at the Juniper/Sage area, and on a monthly basis at the South Pond area.

The bermed containment area of the Juniper/Sage tanks is sized to contain 110% of the largest tank volume and has been confirmed previously as part of engineering specification checks. This secondary containment is equipped with a sump, pump, and automatic controls to return liquids to the process circuits. The South Pond cyanide tank is located adjacent to the intermediate pond, which acts as a large containment area for the tank and has a plastic liner that provides a competent barrier to leakage.

The liquid cyanide storage areas are located outside of the mills, and the tanks are vented on top. Cyanide tanks are insulated and heat traced, and there are fixed HCN monitors and windsocks to indicate wind direction. Build-up of hydrogen cyanide gas is unlikely to occur. The offloading and liquid cyanide storage facilities do not have their own fenced areas; however, they are located within the fenced and secured areas of the mine where public access is controlled. There is warning signage indicating that only authorized personnel are allowed in the area. In addition, all the valves associated with the cyanide storage tanks are locked. At both cyanide storage areas, there are tanks of caustic solution within the secondary containment of the liquid cyanide storage tanks; however, the caustic solution is compatible with cyanide.

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

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

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Discuss the basis for this Finding/Deficiencies Identified:

TRC only uses liquid cyanide delivered in tanker trucks; no drums or wooden crates are involved. Cyanco/TransWood's offloading SOP requires the driver to monitor and control the entire offload operation. The SOP also details responses to any leaks or spillage. At the end of the offload, the driver is required to washdown the end of the delivery hose, the dust cap and the immediate area. The driver is also required to inspect the truck by walking completely around the tractor-trailer before moving it. The inspection ensures that spillage or leaks, if they occurred during the offloading and disconnecting activities, have been cleaned and fittings are securely closed. If there is any spillage or residue on the outside of the truck, offload piping, or pad, the driver washes it off where the material is collected in the cyanide tank secondary containment. In addition, TRC Standard Operating Procedure (SOP or procedure) "Process Reagent Offloading" specifies that TRC personnel shall monitor the connection / disconnection of the offloading process. SOP "Process Spills in Cyanide Secondary Containment" addresses inspection, identification and response for the cleanup or recovery of any leakage. Any spills or leaks related to a cyanide offload and onto the pads are directed inside the cyanide tanks secondary containments and returned back into the system.

TRC has SOP "Process Reagent Offloading" that outlines the requirements for inspection, observation and offloading of liquid cyanide; as well as the operation and maintenance of valves, pumps and various interlocks within the cyanide offloading process. The SOP includes requirements to inspect emergency showers and eye wash stations prior to offloading. In addition, Cyanco/TransWood's offloading SOP "Sodium Cyanide (NaCN) Solution Delivery" describes safe practices to complete the offload. Both the transporter and operator have to confirm that the storage tank has sufficient capacity for the offload. The bills of lading document the pH of the liquid cyanide and tank levels prior and after offloading. The operators sign off the form to authorize the offload. The operators have radios for communication with the control rooms in the event of an emergency. TRC operators are familiar with the Cyanco/TransWood delivery and emergency shut off procedures. SOP "Process Spills in Cyanide Secondary Containment" addresses inspection, identification and response for the cleanup or recovery of any leakage. No spills related to cyanide offloading were reported during this recertification cycle. Both TRC's SOP "Process Reagent Offloading" and Cyanco/TransWood's offloading SOP "Sodium Cyanide (NaCN) Solution Delivery" require operators to use the appropriate PPE during offloading activities. These include rubber boots, face shield and/or goggles, rubber gloves, rubber or neoprene suit, approved respirator, and hardhat. TRC SOP also specifies that TRC

personnel shall monitor the connection/disconnection of the offloading process that is conducted by the Cyanco/TransWood driver. Offloading operations and cyanide alarms are also monitored remotely from the control room. The liquid cyanide already comes with a pink colorant dye. A cyanide offloading event was observed during the audit. The review indicated that TRC has appropriate SOPs and practices to handle and offload cyanide solutions in a safe manner.

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

Standards of Practice

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

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

Discuss the basis for the Finding/Deficiencies Identified:

The scope of the recertification audit at TRC mine includes only facilities in the North area, as the South area did not have any facilities with WAD cyanide concentrations above 0.5 mg/l for the recertification period. The following cyanide facilities from the North area are included in the scope of the audit: Process plant facilities including Sage and Juniper Mills, CIL tanks, CIC tanks, barren and pregnant tanks, cyanide offloading and storage facilities (Sage/Juniper Mill and South Pond), and Caro's acid plant. The scope also includes the tailings pipeline corridor, Juniper TSF Cells 1, 2 and 3, cutoff trenches and seepage collection wells, Izzenhood/L8 leach pad (phases S1-S5), pregnant pond, intermediate pond, south pond (previously the barren pond) and the events ponds (major, minor and N5). There are no treated cyanide water discharges to the environment at TRC.

The Water Pollution Control Permits (WPCP) for TRC describe operating requirements. These permits authorized TRC to construct, operate, and close the operations in accordance with the requirements and conditions of the permit, which includes specific requirements for the cyanide facilities. These requirements and conditions are based on information provided by the operations to the Nevada Department of Environmental Protection (NDEP), describing the facilities and operating methods. Additionally, there are manuals, operating plans, and SOPs for the safe operation of cyanide facilities. TRC has renewed ISO14001:2015 certification of its environmental management system in August 2023 and is valid for three years, which ensures document control practices. All SOPs include a description of the tasks to be performed, PPE

requirements and responsibilities. Procedures are reviewed and updated when there are significant changes in the tasks. Procedures were reviewed and found to be sufficiently detailed to enable safe operation.

TRC has operating manuals, plans and permits documentation in place that include critical assumptions and parameters for the safe operation of cyanide facilities. The Fluid Management Plan for the WPCP permit, dated July 2020, describes regulatory requirements, such as monitoring of the supernatant pond at the Juniper TSF, and a minimum freeboard of 3 feet for the Juniper TSF supernatant pond, and 2 feet for any solution or stormwater pond. The Juniper TSF Operation, Maintenance, and Surveillance (OMS) Manual also indicates a minimum freeboard of 3 feet for the supernatant pond to accommodate the probable maximum precipitation (PMP), and consideration of the 100-year, 24-hour storm event for freeboard calculations, which has been estimated at 2.41 inches. The WPCP application document also includes the design storm event for process solution pond and impoundments. TRC has established a WAD cyanide target of 50 mg/l in tailings discharges at the spigot. Mill reports indicate that if WAD cyanide concentrations are above 50 mg/l, the addition of Caro's acid should be increased. TRC does not discharge any solution containing cyanide to the environment, including surface water.

TRC has developed and implemented standard operating procedures (SOPs) for cyanide related tasks, which describe the standard practices necessary for the safe and environmentally sound operation of cyanide facilities. The operation has identified equipment, personnel, and procedures for cyanide offloading as well as for milling and processing facilities, Juniper TSF, L8 HLF and all associated piping and pumps as having contact with cyanide. The Operation, Maintenance, and Surveillance (OMS) Manual for the Juniper TSF includes a list of critical aspects and areas to be inspected and inspection frequencies, as well as water management procedures to retain storage capacity during operations. TRC has implemented an inspection program with frequencies that varies from daily, weekly, monthly, and quarterly for the Juniper/Sage mills, CIC, CIL, Juniper TSF facilities and L8 HLF. Inspections are conducted by Process personnel following requirements specified in permits and internal documents (i.e., OMS Juniper TSF Manual). The inspection program describes the frequency, responsible department, and required documentation. The inspections are documented using forms that include the name of the inspector, date, and a comments section where deficiencies are noted. Deficiency notifications are sent to maintenance planners where they schedule corrective maintenance via work orders. The inspection program is sufficient to assure and document that the systems are operating within design parameters. Workplace inspections conducted every shift by Process operators include safety equipment (including showers and eyewash stations), piping, containments, process equipment, cyanide offloading areas, strip circuit and CIL areas, tailings impoundment, tailings pipeline, heap leach facilities, and Leak Collection Recovery Systems (LCRS). TRC also monitors pH levels and cyanide concentrations according to operational parameters. Wildlife inspections at heap leach pads and Juniper TSF are also conducted on a daily basis. Identified deficiencies are noted and corrected or reported to supervision for corrective action.

TRC has a corporate-wide procedure Management of Change (MoC) that includes the identification and review of the proposed changes; identification of relevant stakeholders for the project, analysis and evaluation of the changes by a multidisciplinary team including health, safety and environmental aspects; sign off by all areas that participated in the evaluation, approval, and implementation of the change with action plans. There is a MoC App in Barrick's SharePoint platform to complete and manage MoC processes.

The Fluid Management System Operating Plan for TRC describes contingency actions for numerous situations related to cyanide facilities (including leach pads and tailings), such as leaks, spills, and releases; impoundment and slope failures; earthquakes; seasonal and temporary closure. The Juniper TSF Operation, Maintenance, and Surveillance (OMS) Manual includes abnormal operating conditions and emergency response activities such as, leakage or failure in the tailings delivery and reclaim return lines, excessive supernatant pond limits, extreme climatic events, and seepage or slope instability. Also, the OMS Manual covers seasonal, temporary and tentative permanent closure. The Fluid Management System Operating Plan includes a temporary closure plan for both planned and unplanned scenarios and activities related to cyanide management to be implemented in case of a shutdown that extends for more than 30 days, and more than 120 days.

The cyanide tanks at Juniper/Sage and South Pond are inspected for signs of corrosion, leakage, and general deficiencies as part of the monthly offloading inspection form. Other tanks holding cyanide solutions (e.g., barren, pregnant, CIC and CIL tanks) are also inspected for these conditions. Nondestructive tests (NDT) are conducted annually for tanks holding cyanide solutions including cyanide storage tanks, barren, pregnant and CIL tanks. These nondestructive tests are included in SAP as part of the preventive maintenance program. Secondary containments configuration remains substantially unchanged from the previous recertification audits. None of the containment areas has any drains to the adjacent land surface. During the field visit, the secondary containments were observed to be generally free of any fluids or materials stored within them. Inspection forms at the Juniper/Sage mill areas include conditions of tanks, pipelines, sumps, valves and conditions of secondary containments. The HLF is inspected daily including leach pad areas and process solution ponds. The LCRS from the solution ponds are inspected every day and monitored for flow. Cyanide samples are taken if the flow exceeds permit conditions. Flows pumped by the LCRS are below the permit conditions at all ponds, except for the reclaim pond, which is currently offline and will need to be repaired if TRC plans on using it. Pipelines, pumps and valves at the Juniper/Sage mills and HLF are inspected every shift by process operators and by the Maintenance area as part of their preventive maintenance program. The Juniper TSF is inspected daily for critical aspects including available freeboard. L8 HLF is also inspected daily, including surface water diversions. Historical freeboard for the last 3 years at both The Juniper TSF and heap leach ponds were reviewed and verified that they were generally managed according to their design criteria.

Records of inspections are retained and reviewed by the auditors. The inspections are documented and include the date of the inspection, the name of the inspector and observed deficiencies. Inspection forms are reviewed by the supervisor to ensure good quality of inspections. The inspection program also includes cyanide offloading and storage facilities. Corrective actions identified that are related to maintenance of equipment at the mills, L8 HLF and Juniper TSF are managed by the Maintenance area. These corrective actions are managed using the SAP maintenance management system, where work orders are tracked, prioritized, planned and closed. The auditors verified that corrective actions related to cyanide facilities were prioritized for prompt implementation. The auditors reviewed examples of items identified during inspections and records of the implementation of the corrective actions until they were closed.

The Maintenance area has a preventive maintenance program for pumps, pipelines, valves, flow meters, gauges, pH meters, sump pumps, filters, HCN sensors, tanks and cyanide facilities in general. The preventive maintenance program is used to perform necessary maintenance and inspect the integrity of process equipment, piping and tanks, according to a maintenance program and every time it is needed to keep equipment and facilities working properly. TRC uses the SAP maintenance management system for identifying, assigning responsibility, scheduling, and tracking the completion of the preventive maintenance activities. Preventive maintenance plans are generated automatically. Work orders generated from inspection forms are entered in the system, including assigned priority. Examples of preventive maintenance records for the last 3 years for different facilities were reviewed during the audit and were found to be complete.

TRC receives electricity from the public grid to run its operations. In case of power outage, there is a portable power generator of 1 MW (Megawatt) that is shared with another NGM operation located in Nevada (Phoenix) that can be used to maintain the water balance. This generator would be transported to the leach pad area if required to run pumps and recirculate process solution. According to maintenance personnel, the power needed to run these pumps is 75 KW (Kilowatts). The Fluid Management System Operating Plans that have been reviewed and approved by the NDEP permit describes that a power generator might be needed to maintain the water balance, as the operation mainly relies on the capacity of the event ponds to manage power outages. TRC provided examples of preventive maintenance records for the portable power generator for the last three years. A review of these records, confirmed that the generator is checked on a monthly basis for fuel level, lighting, heating and is also start tested. This inspection would trigger a corrective maintenance work order if required.

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

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

Discuss the basis for this Finding/Deficiencies Identified:

TRC has determined the appropriate cyanide addition rates in the mills and has evaluated and optimized these addition rates during the recertification period. Cyanide is added at the Sage CIL circuit in tanks #1, #2, and #3. TRC conducts metallurgical testing to review cyanide concentration and make changes as needed. Samples are taken every 3 hours for cyanide titration from CIL tanks #1, #2, #7 and the tails tank, and free cyanide targets have been defined for each tank. Cyanide targets have been set up at 0.10 - 0.14 grams per liter (g/L) of free CN at CIL tank #1; 0.06 – 0.10 g/L at CIL tank #2; and 0.03 - 0.05 g/L at CIL tank #7. At the tails tank, the target is < 0.040 g/L. If cyanide values are above the target at the tails tank, cyanide addition is reduced. The auditors reviewed data and verified that TRC is managing cyanide according to the defined targets.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

TRC continues to use a comprehensive, probabilistic water balance using Goldsim software platform. The water balance is updated once a year by using real precipitation data, tailings deposition and ore placed in leach pads. The water balance was last updated in January 2023. The water balance is recalibrated when there are major changes to the facilities, otherwise it is just updated with real data every year. TRC water balance includes the following factors: tailings production; tailings deposition rates; ore placement on leach pad; precipitation, evaporation (calculated) and seepage rates; impacts of freezing and thawing; and freshwater input. Potential power outages are not included in the water balance as the operation mainly relies on the capacity of the event ponds to manage the water balance. TRC has zero process water discharges to surface waters. The water balance model and calculations are described in the "2020 Twin Creeks site wide water balance update" document developed by WSP.

The TRC Water Balance Model developed by WSP describes the solution rates applied to the leach pads through the heap leach pumping rates (0.003 gallons/minute/square feet). The document also considers the tailings deposition rates into the Juniper TSF. Bathymetric surveys of the Juniper TSF supernatant pond are conducted every quarter to evaluate consolidation of the tailings and are included in the updates of the model. The Fluid Management Plan for the WPCP permit, dated July 2020, defines a minimum freeboard of 3 feet for the Juniper TSF supernatant pond, and 2 feet for any solution or stormwater pond. In addition, the WPCP application document includes the design storm event for process solution pond and

impoundments (100-year, 24-hour storm event, which has been estimated at 2.41 inches). There are three weather stations at TRC; however, only two of them are used for water balance purposes (one in the south area and one in the north area). These weather stations have collected rainfall data since 2011. The weather station in the south is calibrated every quarter to ensure collection of good quality data. Evaporation data is calculated using other weather parameters such as temperature and relative humidity. The Juniper TSF and L8 HLF have a surface water control system for controlling and safely directing runoff generated from upgradient watersheds around them. The Juniper TSF and L8 HLF only receive water through rainfall and snow that falls directly in these facilities. This water input is included in the model. Water entering these facilities from upgradient run-on (e.g., the mills) is considered negligible. The water balance takes into account conditions of freezing and thawing, including snowmelt and an allowance for an average spring breakup (thawing) period. The water balance considers evaporation losses and calculated infiltration rates. The Juniper TSF has a clay liner to reduce the potential for seepage to the subsurface and includes a seepage collection pond below the TSF dam to collect and return seepage back to the system. The cutoff trenches and seepage collection wells from the Juniper TSF are also included in the model as they report to the seepage collection pond. In the case of the L8 HLF, the pad has a synthetic liner and does not have an underdrain system to collect seepage from the heap leach pad or solution ponds. Potential power outages are not included in the water balance model as the operation mainly relies on the capacity of the event ponds to manage the water balance activities. TRC has a portable power generator of 1 MW that is shared with another NGM operation located in Nevada (Phoenix) that can be used to maintain the water balance. This generator would be transported to the leach pad area if required to run pumps and recirculate process solution. TRC does not discharge any solution containing cyanide to the environment, including surface water. As such, this component is not considered in the water balance. The water balance incorporates site-specific information such as the ore moisture content, inactive ore moisture content, leachate application methods and rates, and solution travel velocities. The model takes into account moisture content during beach formation within the TSF.

TRC conducts frequent inspections of the Juniper TSF and L8 HLF and monitoring activities to ensure these facilities are operated according to the design criteria. Process operators conduct daily inspections to the Juniper TSF and L8 HLF. The auditors reviewed inspections records and verified that the Juniper TSF and L8 HLF are inspected in a consistent manner. The site presented evidence that the operation has maintained during the last three years enough freeboard capacity at all times (freeboard of 3 feet for the Juniper TSF supernatant pond, and 2 feet for any solution or stormwater pond) to contain the 100-yr, 24-hr storm event. For the Juniper TSF, a bathymetric survey is conducted every quarter at the supernatant pond to evaluate consolidation of the tailings. The engineer of record also conducts periodic inspections of the Juniper TSF.

TRC incorporates inspection and monitoring activities into their procedures to implement the water balance and prevent the overtopping of the Juniper TSF and process ponds. TRC tailings dam is being constructed in stages and the current stage elevation is well above the required

storage level for storing supernatant, impounded tailings, and storm events. The current freeboard at the time of the field audit is 20 feet. The tailing operators conduct daily inspections of the seepage collection pond and impoundment area. A survey is conducted every quarter at the Juniper TSF supernatant pond to evaluate consolidation of the tailings. The L8 HLF, including solution ponds levels, are monitored on a daily basis. Solution ponds are equipped with ultrasonic level sensors that report to the control room for real-time monitoring of pond levels.

TRC measures precipitation daily and the data is uploaded into the water balance model. The water balance is updated once a year by using real precipitation data, tailings deposition and ore placed in leach pads. The water balance was last updated in January 2023. The water balance is recalibrated when there are major changes to facilities, otherwise it is just updated with real data every year.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 4.4

Discuss the basis for the Finding/Deficiencies Identified:

TRC does not operate ponds, impoundments, or other areas of open waters with WAD cyanide concentrations above 50 mg/l. The Juniper TSF supernatant pond and the heap leach solution ponds are maintained well below the 50 mg/l WAD cyanide. Regardless of that, the site has implemented the following measures to restrict wildlife and livestock access to open waters: Chain link fence around the mine perimeter; eight-foot high combination chain link fence around the process ponds, and use of geonet to cover gaps between fences when necessary; birdballs on the surface of the intermediate pond. In addition to the physical restrictions listed above, the operation uses mobile propane cannons around the perimeter of the Juniper TSF supernatant pond for temporary hazing, as needed.

TRC does not operate ponds, impoundments, or other areas of open water with WAD cyanide concentrations above 50 mg/l. In the case of the Juniper TSF, TRC has established a WAD cyanide target of 50 mg/l in tailings discharges at the spigot. The site uses Caro's acid to destroy cyanide in the tailings before discharge to the tailings impoundment. Mill reports indicate that if WAD cyanide concentrations are above 50 mg/l, the addition of Caro's acid should be increased. WAD cyanide concentrations measured at the discharge spigots to the TSF did not exceed 50 mg/l during this recertification period. There were no events that exceeded WAD cyanide concentrations above 50 mg/l in the supernatant pond during the recertification period. A review of monitoring results of the supernatant pond for the last three years reported values below 1 mg/l WAD cyanide. A review of monitoring results of the heap leach process solution ponds for

the last three years indicated that WAD cyanide concentrations were below 50 mg/l for the recertification period. The intermediate pond has bird balls to limit access of wildlife to open waters; however, WAD cyanide concentrations are maintained below 50 mg/l at this pond. Cyanide concentration of the solution applied at the L8 HLF is above 50 mg/l WAD cyanide.

During the last 3 years, TRC has been successful at preventing wildlife mortalities related to cyanide facilities. Both the Juniper TSF and L8 HLF are inspected daily for wildlife mortalities. There have been no wildlife mortalities related to cyanide management for the recertification period. The WAD cyanide values at the Juniper TSF are well below the recommended value of 50 mg/l. At the solution ponds, WAD cyanide concentrations were also below 50 mg/l for the recertification period. TRC has Industrial Artificial Pond permits with the Nevada Department of Wildlife (NDOW), where they are required to maintain concentrations in open waters to prevent any cyanide mortality, conduct wildlife monitoring, and report all wildlife mortalities. If an animal mortality is found, TRC holds the carcass until authorized by NDOW to dispose of it. If there is concerns whether the mortality is related to cyanide, NDOW has the authority to require testing. The auditors reviewed the wildlife mortalities register and there were no mortalities related to cyanide for the recertification period.

Izzenhood/L8 is the only active heap leach facility on site during the recertification period. Leach solution is applied with drip emitters on the top surface and on the side slopes, which limits the possibility of overspray of leach solutions off the leach pad liner on the heap side slopes. The WPCP includes requirements on how to leach on side slopes to prevent cyanide releases off the leach pad. The operators conduct daily inspections where ponding, if present, would be noted and mitigated. In addition, the weekly leach pad inspection form includes actions to be taken in case of ponding such as adjust dripper locations, place netting or gravel, among others. A follow-up inspection is also conducted to ensure the ponding condition has been corrected. Cyanide concentration of the solution applied at the L8 HLF is above 50 mg/l WAD cyanide (average of 115 mg/l).

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 4.5

Discuss the basis for the Finding/Deficiencies Identified:

Not applicable to TRC, as it does not have direct discharges of any solution containing cyanide to surface water. The site operates with zero discharge of process solutions. Current water treatment facilities at TRC are related to pit dewatering. The mine is located in an arid climate with no natural surface water bodies on the properties or within close proximity.

The Juniper TSF is designed to seep water through the toe of the dam. Seepage from Juniper TSF Cell 3 is collected and contained in a seepage collection tank that is located inside a plastic lined pond and pumped back to the mill as make up water. Water quality data from the seepage collection is monitored monthly to detect the presence of cyanide. WAD cyanide values reported for the recertification period were below 0.02 mg/l. In addition, TRC monitors WAD cyanide at monitoring station SW-09 in Rabbit Creek that receives dewatering discharges. Rabbit Creek is an ephemeral surface water drainage and is located 3 miles downgradient of the TRC cyanide facilities. SW-09 has been reported dry for the recertification period during quarterly sampling events.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 4.6

Discuss the basis for the Finding/Deficiencies Identified:

Main facilities that may contribute to seepage to groundwater are the Juniper TSF and L8 HLF, including solution ponds. TRC employs a number of specific water management and control measures to protect beneficial use of groundwater. These facilities remain substantially unchanged since the initial certification audits and subsequent recertification audits, except for the completion of Juniper TSF Stage 11 construction. TRC has implemented the following measures to protect groundwater below and downgradient of the operation: Double geomembrane liners with leak detection under all cyanide heap leach facilities; double geomembrane liners with leak detection and collection systems for all process water and minor events ponds; single geomembrane liners for all major events ponds (used only in emergency or upset conditions); geomembrane-lined secondary containment ditches or pipe-in-pipe containment for all cyanide-bearing pipelines; underdrains with seepage collection systems above low permeability layers under all cells of the Juniper TSF. The Juniper TSF is underlain by low permeability layer (seal zone soils) and a drain gravel layer with perforated pipes to collect seepage; the tailings embankments have a clay core at the lower levels and High-Density Polyethylene (HDPE) liner where the supernatant pond contacts the embankment; and the embankments also have seepage collection systems; and all cyanide tanks and pipes have been designed with secondary containments such as concrete or lined containments. TRC conducts regular inspections of the underdrains and leak collection systems to ensure that the facilities are functioning as designed and protective of the environment. Additionally, TRC has installed several monitoring wells immediately downgradient of the cyanide process facilities to monitor groundwater.

TRC continued monitoring groundwater wells around the process area in accordance with its WPCP. In the case of the Juniper TSF, groundwater monitoring stations GW-10, GW-8, and GW-8S are located downgradient of the facility. Monitoring results for the recertification period showed a maximum WAD cyanide value of 0.01 mg/l for one sample while the rest were no detectable (<0.01 mg/l). As stated in previous certification audit reports, in 2012 TRC constructed two cutoff trenches and two seepage recovery wells with a pumping system designed to intercept a leak detected at the toe of the TSF dam and convey all fluid to the seepage collection pond. Two monitoring wells were also constructed as part of the system (GW-10 and GW-11). Monthly and quarterly monitoring results of these two wells for the recertification period showed a maximum WAD cyanide value of 0.03 mg/l, which is below the standard of 0.2 mg/l for WAD cyanide. In the case of the L8 HLF, groundwater monitoring station GW-4 is located downgradient of the facility. The quarterly monitoring for the recertification period at this station showed no detectable WAD cyanide in groundwater. The beneficial use for groundwater downgradient of the TRC, as designated by the State of Nevada, is agricultural and livestock use. The standard is 0.2 mg/l WAD cyanide. TRC has not caused cyanide concentrations in groundwater to rise above levels protective of beneficial use.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 4.7

Discuss the basis for the Finding/Deficiencies Identified:

TRC has implemented spill prevention and containment measures for processing facilities. These facilities remain unchanged since the initial certification audit and the previous recertification audits. All tanks containing cyanide have secondary containments including the cyanide storage tanks (3 in Juniper and 1 in South Pond), CIL tanks (7), tails tank (1), barren tank (1), pregnant solution tanks (2), reactivated carbon slurry tank (1), loaded carbon slurry return tank (1), CIC tanks (10), and leach barren return tank (1). The containments are constructed of cast-in-place reinforced concrete. There are automated pumps within the containments to pump collected solutions back into the process circuit. Automated sump pumps are included in the preventive maintenance program. The Juniper/Sage cyanide tanks secondary containment has a sump to collect any leakage and a pump to return it back to the system, while the South Pond cyanide tank is located adjacent to the intermediate pond, which acts as a large containment area for the tank. The secondary containment systems are inspected as part of the process facilities inspection system.

As stated in the last recertification audit report, secondary containments for cyanide offloading, storage, and process tanks are sized to hold a volume at least 110% of the largest tank within the containment and piping draining back to the tank with additional capacity for the design storm

event. The secondary containment volume calculations were reviewed and deemed as sufficient. Furthermore, those containments have remained unchanged since last recertification audit. The Juniper mill has an overflow line ditch that drains to L8 leach pad area, providing additional containment capacity. The entire process area is contained within a concrete pad surrounded by curbs and walls, providing a competent barrier to seepage. The concrete floor is sloped to drain to concrete trench drains, where any spills or rainwater will be pumped back to the process, or they are equipped with plastic lined channels that flows by gravity to adjacent process ponds. At Juniper/Sage, the containment system of the offload area is adjacent to the mill area. The containment area has a sump pit with dedicated pumps that return collected fluids back into the process circuit. The secondary containment area is constructed of reinforced concrete. The South Pond cyanide tank is located adjacent to the intermediate pond, which acts as a large containment area for the tank.

TRC has several procedures, plans and manuals in place which are implemented to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in a secondary containment. All tanks and cyanide facilities are located inside concrete secondary containment systems with dedicated pumps that remove solutions and return them into the process circuit. The pumps have automatic level sensors to keep the secondary containments free of any fluids. The automatic pumps are included in the preventive maintenance program. There is no discharge of cyanide-containing water from the secondary containment areas as the secondary containments are not designed to discharge into the environment. As stated in the Code, no specific written procedures are necessary as the containment systems have sumps and dedicated pumps and piping to return solutions to the production process. Regardless of this, TRC has SOPs to prevent discharges of cyanide solutions to the environment, or cyanide-contaminated water from secondary containments.

TRC has spill prevention and containment measures for cyanide process solution pipelines. These facilities remain largely unchanged since the initial certification audit and the previous recertification audits. TRC has constructed all pipelines with spill prevention and containment measures to collect leaks and prevent releases. Pipelines have been constructed either as pipe-in-pipe configuration or within lined ditches and pipelines between separate processing buildings are connected with HDPE pipelines in concrete, underground utility corridors. Cyanide pipelines are inspected daily using an inspection checklist. The tailings delivery and reclaim water pipelines between the process area and the Juniper TSF are located above ground. The tailings slurry and reclaim water pipeline are constructed within a HDPE lined ditch and a pipe-in-pipe configuration where the pipeline reaches the TSF. In case of failure of the tailings or reclaim water pipelines, the tails/water spilled will be collected in the flush pond, which is connected to the HDPE lined ditch. Pipelines between the Juniper mill and the L8 HLF are contained in HDPE-lined ditches or within pipe-in-pipe systems where they go under roads. The barren pipelines to the L8 HLF are equipped with both pressure and flow monitoring systems that report to the control room. The pregnant lines from the L8 HLF are equipped with flow monitoring devices.

As mentioned in previous audit reports, no cyanide pipelines present a direct risk to surface water. There are no perennial or ephemeral surface water bodies in the vicinity of TRC requiring special protection for pipelines. All outside pipelines have secondary containment: pipe-in-pipe, concrete ditch or enclosure, or pipe within a lined channel. Pipelines to and from the Juniper TSF and L8 HLF remain unchanged and retain the same safety features identified in previous audits. All facilities are far away from areas that may require special protection.

As stated in previous audit reports, all cyanide storage and process tanks are constructed of coated carbon steel placed on concrete foundations; liquid cyanide pipelines are constructed of carbon steel or stainless steel; cyanide solution pipelines are constructed of steel or HDPE. All these materials are compatible with high pH cyanide solutions. All tanks and pipes were well supported and in good condition.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 4.8

Describe the basis for the Finding/Deficiencies Identified:

Quality assurance and quality control (QA/QC) programs have been implemented during the construction of cyanide facilities at TRC. The site maintains files with QA/QC reports for the facilities constructed before the last recertification audit in 2020, which was found in compliance with the Code requirements, and has implemented QA/QC programs for the new cyanide facilities built during this recertification period. Appropriately qualified personnel have prepared the documents (Nevada registered Professional Engineers) and subsequently approved by the NDEP, and the Bureau of Mining Regulation & Reclamation. Since the last recertification audit, the only new cyanide facility constructed and put in operation has been Stage 11 of the Juniper TSF, which was commissioned in 2021 and includes a raise of the entire perimetral crest of the dam. The auditors reviewed the record of construction report for this facility, which was developed by Geo-Logic, dated Sept 2021 and includes appendices with pictures and daily reports of the construction, QA/QC records, and as-built drawings. The construction was conducted in accordance with accepted engineering standards and specifications. A Registered Professional Engineer signed the report. Material used for the dam raise was borrowed from an old leach pad that has not been in operation since before 2011, and waste rock. The record of construction report was approved by NDEP and the Division of Water Resources.

All QA/QC programs at TRC address the suitability of materials and adequacy of soil compaction. The mine maintains files with the QA/QC reports for its cyanide facilities. The QA/QC reports include suitability of materials and adequacy of soil compaction for earthworks including tank

foundations, subgrade and concrete testing, fabrication material certificates and technical specifications for HDPE drainage products, geo-synthetic, liners, piping, electrical and mechanical instrumentation. For the new expansion of the TSF impoundment (Stage 11), the auditors verified that QA/QC activities were conducted for placement of random fill to form embankment raise, extension of face drain collection pipes on upstream side of embankment, placement of face drain collection pipe bedding material on upstream side of embankment, and placement of face drain material on the upstream of the embankment. As-built drawings are also included in the QA/QC reports. QA/QC reports also include non-destructive test logs, destructive test logs, vacuum tests, pre-weld tests, destructive sample tests, and repair controls.

QA/QC records for the new cyanide facilities (Juniper TSF Stage 11) are retained by TRC. The auditors also verified that QA/QC records are retained for all other cyanide facilities including previous stages of the Juniper TSF (Stages 1-10), tailings pipeline, the Juniper and Sage mills, and Izzenhood Heap Leach Pad Stages 1-5.

Qualified engineering companies performed the QA/QC inspections and reviews during construction of the cyanide facilities at TRC and prepared the final construction reports certifying that the facilities were constructed in accordance with the design drawings and technical specifications. The auditors reviewed records of construction reports, including as-built drawings for the new cyanide facilities. As-built drawings were properly stamped by a qualified engineer. QA/QC reports are signed by qualified personnel from reputable engineering companies and provided documentation that the facilities were built as designed.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 4.9

Describe the basis for the Finding/Deficiencies Identified:

TRC's "Sampling and Analysis Plan" (dated 2020) addresses monitoring requirements related to surface water, groundwater, process fluids, supernatant and reclaim water. The procedure describes the requirements for preparation for sampling, sampling schedule, field water quality measurements, groundwater well sampling, surface water and spring sampling, pond and reservoir sampling, sample documentation, calibration of sampling equipment, field data collection, collection and preservation of samples, chain of custody, and transportation. The plan also includes a map with monitoring locations for surface and groundwater. The TRC WPCP permit NEV0086018 dated July 2020, include the cyanide species and other parameters to be analyzed, as well as frequency and sampling locations. Water monitoring activities are conducted by Environmental department personnel. Samples are sent to PACE Analytical Lab in Sheridan,

Wyoming, and is certified by the State of Nevada. Additionally, the Environmental on-call Manual document discusses wildlife mortality investigation and reporting requirements.

Qualified personnel of TRC environmental department prepares and updates the Sampling and Analysis Plan as needed. Staff in charge of preparing the plan are suitably qualified, with many years of experience in environmental management and in mining activities. The plan is updated by environmental technicians with guidance and peer review, and it is ultimately revised and approved by the Environmental manager. In July 2023, Envirostandards consultant conducted an audit of the monitoring practices and provided feedback to update the plan. The plan is reviewed and updated every 5 years, or when there have been significant changes in the operations. The most updated version of the plan is sent with the annual report to the Nevada regulatory agencies. Analytical protocols for environmental samples are provided by PACE Analytical lab in Sheridan, Wyoming, which is certified by the State of Nevada. The auditors reviewed letters of certification and website documentation to verify compliance.

The “Sample and Analysis Plan” describes preservation techniques, equipment calibration, sampling procedures, chain of custody procedures and shipping instructions. The samples are analyzed at PACE Analytical Lab located in Sheridan, Wyoming. The analytical protocols have been selected using standard methods to achieve the desired detection limits. The plan includes quality assurance and quality control requirements (QA/QC) for sampling activities (e.g., duplicate samples, blanks). The TRC WPCP permit includes the cyanide species and other parameters to be analyzed (Profile 1), as well as frequency and sampling locations.

TRC documents sampling conditions on field logs that accompany each sample. The log includes the date and time, the sampler, weather conditions, sampling method, field parameters, flow rate, depth of water and purge volume (for wells), sample volume and sample preservation. A comments section is used to document abnormal sampling conditions as well as wildlife activity and anthropogenic influences. Completed monitoring field forms were reviewed by the auditors and verified that these conditions are being registered consistently.

TRC conducts monitoring at frequencies adequate to characterize the groundwater and identify wildlife mortalities. Groundwater samples are collected and analyzed on a quarterly basis. Wildlife monitoring is continuous while employees are in the field and during daily inspections. Surface water quality is also monitored on a quarterly basis, though this sampling is not related to cyanide facilities but to dewatering activities.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

TRC has prepared a reclamation and closure plan as part of their permitting programs for the operations. The current version of the Twin Creeks Mine Reclamation Plan was developed in 2021 and approved in May 2023 by the NDEP-BMRR (Bureau of Mining Regulation and Reclamation). The closure plan addresses decommissioning and reclamation of all project components at the cessation of operations including the decommissioning of all cyanide facilities such as the Juniper TSF, L8 HLF, solution ponds, and the Juniper/Sage mills and plant buildings. This includes removal of process water from facilities through evaporation of residual process solutions. In addition, the closure plan addresses disposal of buildings, equipment, piping, scrap, reagents, equipment, and materials. The Fluid Management System Operating Plan for the Water Pollution Control Permit, dated 2020, includes a draft permanent closure plan that mentions decontamination of cyanide facilities according to the SOP “Cyanide Equipment Decontamination” for reagent cyanide and cyanide solutions by flushing the equipment with water. Rinsing of heap leach pads is not considered in the closure plan. There is no solid cyanide storage at TRC and as such, it is not considered as a reclamation item in the closure plan. No water treatment needs for cyanide facilities are considered for the post closure phase. Decommissioning activities include all the necessary steps to bring the facility’s components to a safe, chemically stable condition, such that they do not present a risk to people, wildlife or the environment due to their cyanide content.

The Closure Plan for TRC includes a conceptual implementation schedule for decommissioning activities, including the sequence and duration of facilities closure. Current life Of Mine (LOM) of TRC extends until 2042. The closure schedule includes activities to be conducted starting in year 1 of closure with water management at the Juniper TSF and L8 HLF until year 12. Earthworks of Juniper TSF and L8 HLF from year 3 until 5, and year 2 until 5, respectively; solution ponds earthworks in year 12 and demolition of plant in year 5. This schedule will continue being refined as TRC approaches the closure period.

TRC reviews the reclamation plan and updates it periodically. The reclamation plan is updated every 3 years or when closure strategies significantly change. The current version of the Reclamation Plan is dated May 2023. NDEP-BMRR requires an update of surety bonds for reclamation every 3 years. In addition, there is a Tentative Plan of Permanent Closure (TPPC) in the Fluid Management System Operating Plan for the Water Pollution Control Permit that is developed based on the reclamation plans and needs to be revised and updated every 5 years as a requirement of the WPCP. TPPC is dated 2020. In addition, Barrick corporate office requires its operations, including TRC, to review and update its Provision for Environmental Rehabilitation (PER) cost estimation for the mine, including cyanide facilities decommissioning costs. These costs are reviewed every quarter and updated annually and submitted to the corporate office, where it is audited financially by an external party.

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

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

Describe the basis for this Finding/Deficiencies Identified:

TRC has developed cost estimates for full funding of third-party implementation of reclamation and decommissioning activities described in the reclamation plan. Cost estimates utilize the "Standardized Reclamation Cost Estimator" (SRCE), a cost-estimating model developed by the Nevada Division of Environmental Protection and the Bureau of Land Management. The cost estimates include third party unit costs, local equipment rental rates, costs for engineering design, contingency, insurance, performance bond, contractor profit, and agency indirect costs. Barrick's Provision for Environmental Rehabilitation (PER) cost estimation includes cyanide facilities decommissioning costs. These costs are reviewed every quarter and updated annually and submitted to the corporate office, where it is audited financially by an external party. According to TRC personnel interviewed, these costs are calculated using TRC rates.

TRC reviews the reclamation plan and updates it periodically. The reclamation plan is updated every 3 years or when closure strategies significantly change. The current version of the Reclamation Plan is dated May 2023. NDEP-BMRR requires an update of surety bonds for reclamation every 3 years. The total reclamation cost included in the closure plan for bonding purposes is US$ 189.5 million. PER cost estimation is reviewed internally every quarter and submitted to the corporate office and audited every year as part of the financial statement of the company. In addition, NDEP requires that reclamation plans and costs are updated at least every three years or if there is a major modification of the facilities. The 2022 PER reclamation cost estimate for TRC is $54 million and includes decommissioning measures for the Juniper TSF, process buildings and equipment, L8 HLF and process ponds, pipeline removal, disposal of

wastes, and associated overhead and administrative costs. This amount is for closure and reclamation of all facilities at TRC, including decommissioning of cyanide facilities.

TRC has established financial assurance mechanisms approved by the Bureau of Land Management (BLM) Nevada State Office. For the Twin Creeks Mine, BLM issued a Decision Letter dated May 04th, 2023 accepting a Surety Bond Rider for US$189.5 million. This amount is based on the 2022 Twin Creeks Reclamation Plan cost estimate. This surety bond is updated and renewed every 3 years.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

The Turquoise Ridge Complex has standard operating procedures (SOPs), as well as manuals, plans, and guidelines that describe the management and operation of cyanide facilities to help minimize the possibility of worker exposure to cyanide. The SOPs and manuals have been developed for the cyanide storage areas, mill areas, detox circuit, Heap Leach Pad (HLP) and TSF areas. They provide detailed information for the risks involved with each task (including unloading, plant operations, entry into confined spaces, and equipment decontamination) and adequately describe safe work practices. Field Level Risk Assessments (FLRAs) and team level risk assessments are also used prior to beginning certain tasks.

The SOPs detail task specific requirements to conduct the tasks, with consideration of safety and potential hazards associated with the job. Verification of the written procedures included review of the specific task, plans and worker interviews. In addition to the OMS Manual for the TSF, the plans, guideline documents and 12 cyanide related SOPs are used in the operation.

The Turquoise Ridge Complex has Standard Operating Procedures (SOPs), team level risk assessments, and FLRAs that require the use of personal protective equipment (PPE) and conduct pre-work inspections for cyanide related tasks. The risk assessment forms require acknowledgement that personal protective equipment (PPE) required, tools and specialized PPE

required, safety and potential physical and chemical hazards associated with the job and procedure have been identified and addressed. In addition to the use of general PPE, such as hard-hat, steel toes boots, hearing protection, high visibility clothing, and safety glasses throughout the production area, areas and/or tasks where personnel may come into contact with cyanide may have additional PPE requirements.

The Turquoise Ridge Complex routinely solicits input from the workers when developing and evaluating the procedures. This is also accomplished through review of the procedures during safety meetings and during area or task training. Operators can communicate directly with supervisors regarding effectiveness and opportunities for improvement for the training and procedures. Operators conduct pre-task and job hazard analyses, which also provide an opportunity for feedback regarding procedures.

Formal procedure reviews for any new or modified procedures occur regularly. The general supervisor, trainer, and supervisor participate in the review, at a minimum. Safety meetings are used to solicit worker input from the rest of the operations team. Any changes to procedures are communicated during safety meetings and additional training is conducted, if required. An open door policy also allows workers a means of providing input into the procedures.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 6.2

Describe the basis for the Finding/Deficiencies Identified:

Turquoise Ridge has determined different pH levels for cyanide solutions during offloading and production activities as part of their operating philosophy to prevent the generation of HCN gas. The Process CIL Operation SOP indicates that the pH in the CIL circuit will be maintained between 9.5 and 9.8 through lime addition. The pH readings are monitored in the control system, as well as by the operator during their shift.

The Fluid Management System Operating Plan indicates that heap leach solutions will have a pH range of 9.5 to 11. With the last ore placement occurring in November 2022, the leach pad relies on residual lime to provide protective alkalinity and control the pH of the solution. The pH in the intermediate and pregnant solutions has been lower than target during the recertification period; however, the cyanide addition method to the barren solution limits the risk of HCN exposure at the addition point, as it occurs in an enclosed pipeline and increases the pH of the barren solution prior to discharge at the drip emitters on the leach pad.

HCN levels are monitored through fixed position gas monitors. These sensors are mounted in all areas of the plant in which HCN exposures are possible. The units are fitted with a visual alarm comprising blue and amber strobes and an audible alarm. If ambient HCN concentrations above 4.7 ppm are detected, the amber light is activated. The blue strobe signals if HCN levels exceed 10 ppm and the audible alarm is also triggered. HCN levels are displayed locally at the front of the unit.

The operating procedures require that a stationary alarm being triggered for HCN levels above 4.7 ppm, but below 10 ppm, the area is cleared of nonessential personnel and checked by authorized personnel using a handheld multi-gas monitor to ensure continuous safe working conditions and evaluate potential causes. Where HCN levels exceed 10 ppm, the procedure requires evacuation of the area for all employees until the area is deemed safe for workers to return. If necessary, emergency escape packs are also available throughout the operation and could be used as a means of self-rescue in the event that high levels of HCN are present.

Portable HCN meters are provided and made available for use in areas where there is a potential for HCN exposure, such as confined spaces. The portable units are self-calibrated in their dock station on a monthly basis, with bump tests occurring every day. The site industrial hygienist reviews the calibration records to ensure that the portable units are continuing to function properly.

Hydrogen cyanide monitoring equipment is maintained, tested and calibrated as directed by the manufacturer, and records are retained. The Electrical and Instrumentation (E&I) group is responsible for the calibration of the fixed HCN monitors. Calibration is conducted on a monthly basis. The site's preventative maintenance program automatically generates a work order for the calibration reminder. The calibration and maintenance schedule are considered to meet the manufacturer's recommendation for maintenance of these units. The calibration records for the recertification period were reviewed and found to be complete.

Warning signs are posted in all areas where cyanide is present advising workers that cyanide is present and that smoking, open flames and eating and drinking are not allowed. No special signage is posted for PPE, as no areas require special PPE beyond that worn for routine operations. Any special task required PPE is indicated in the Standard Task Procedure (STP) or SOP. The signs are in English, which is the language of the workforce. Verification was through visual inspection of the signs located in areas where cyanide solution is stored and used. These areas included cyanide storage and the process plants, as well as the tails storage facility and the heap leach facility.

Turquoise Ridge Complex receives cyanide from Cyanco. The cyanide solution is delivered to the sites with dye already added. The concentrated cyanide solution used on site has a red color for clear identification.

Turquoise Ridge has installed showers, eye wash stations, and dry powder fire extinguishers at strategic locations throughout the operation in all areas where there is a potential for exposure to cyanide. Showers and eye wash stations are inspected and tested every shift before beginning work in the area and prior to beginning a task that has the potential for cyanide exposure, such as cyanide delivery. Record of the inspection and test is recorded on the operator logs. Fire extinguishers are inspected monthly and serviced annually, as evidenced by the monthly inspection tags affixed to each extinguisher, as well as the annual inspection sticker for each unit.

The operation has identified all tanks and pipes that contain cyanide solution to alert workers of their contents. Pipes containing cyanide, including the tailings delivery and reclaim water return lines, are marked as containing cyanide solution and flow direction is indicated. Cyanide storage and process tanks are marked as containing cyanide. Verification was by visual inspection. The auditors followed the cyanide solution circuit from the cyanide storage areas to the heap leach pad facilities and the mill circuits where cyanide is used.

Turquoise Ridge has available Safety Data Sheets (SDS) and first aid procedures in all areas where cyanide is managed. AII information relating to cyanide management including SDS information, SOPS and emergency response plans are provided in English, the workforce language at the site.

Electronic safety data sheets (SDS) are accessible to all staff from computers located throughout the facility using the online portal for which all staff are trained to use. Employees receive training on the use and interpretation of SDS, in accordance with Mine Safety and Health Administration (MSHA) requirements for hazard training.

Incidents, injuries, occurrences of property damage, loss to process and near misses are recorded onto an online reporting system Isometrix. Reporting is required immediately on occurrence to a supervisor who is then required to provide the preliminary report into Isometrix within 24 hours. The incident report is submitted, and appropriate personnel are notified. The incidents are routinely assessed further, and the findings are shared at crew safety meetings.

Incidents are investigated in accordance with mine´s guideline with root cause analyses completed. Incidents are retained on the database for categorization and aid in prevention of reoccurrence. Corrective actions are followed up until closure. There have been no health, safety or environmental cyanide related incidents reported during the recertification period.

No cyanide related emergencies occurred during this recertification period required the implementation of the emergency response procedures. The investigation procedures were implemented, as required, for non-cyanide related events, such as property damage incidents.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 6.3

Summarize the basis for this Finding/Deficiencies Identified:

Turquoise Ridge has made available antidote kits, water, oxygen, resuscitators, radios, telephones, and alarms at the site. Amyl nitrite and escape respirators are located throughout the process plants where cyanide is present. The locations of the emergency equipment were deemed to be appropriate for the operation. Oxygen bottles, resuscitators, water, and Cyanokits are located in the ambulances. Oxygen bottles, along with additional PPE, are also located in the control room, buildings near the offload areas, and in the first aid room.

All operators carry a radio while performing their tasks. The site Mayday procedure dictates the communication between operators and the emergency response team in the event of an emergency. There is also a Femco phone system located at the cyanide offload and storage area, as well as throughout the process plant. All fixed HCN monitors are equipped with an audible and visual alarm. Emergency buttons are also located in key areas where cyanide may be present that allow the operator to easily signal for help.

Cyanide antidote kits consisting of amyl nitrite ampoules with expiry date information are located within small refrigerators fitted with thermometers to ensure that the ampoules are stored within a regulated temperature range between 36° and 46°F. Cyanokits are also available in the emergency response vehicles and at the medical clinic.

Ten-minute air escape packs are located at key plant areas to provide emergency air supply to a single area occupant. Self-Contained Breathing Apparatus (SCBA) equipment is maintained in the emergency response bay and on the emergency response apparatuses.

Showers and eye-wash stations are located at strategic areas of the plant where cyanide and other chemicals are used. The showers and eyewash stations are tested each shift and prior to cyanide offloading or other tasks in cyanide related areas. Emergency push buttons are located in key areas where cyanide exposure may occur that would alert the control room to an issue. The control room is staffed 24 hours per day.

Emergency response equipment is regularly checked by emergency response and other health and safety personnel, including the fulltime paramedics. This includes inspections of cyanide antidote kits (amyl nitrite and Cyanokit) and first aid stations. Supplies are replaced if they are used. The eye wash stations, emergency showers and escape respirator packs are inspected each shift by the area operator. Inspections include checks of expiration dates of cyanide

antidote kits and ensuring that the kits are stored per the manufacturer's recommendations. Mine Rescue personnel inspects the emergency response vehicle monthly, including oxygen bottles, the amyl nitrite, and the Cyanokits.

Turquoise Ridge has an Emergency Response Plan (ERP) and the Fluid Management System Operating Plan for Water Pollution Control Permit NEV0086018. In addition, Turquoise Ridge also utilizes the Operation, Maintenance, and Surveillance (OMS) Manual, Juniper Tailings Storage Facility (TSF). The documents include communication roles and responsibilities, evacuation procedures, required notifications, reporting procedures, incident categories and risk assessment. Sections within the ERP and Plans specifically address emergency response procedures related to cyanide releases and cyanide exposures. The ERP and supporting documents detail the emergency response procedures to address exposure to cyanide through ingestion, inhalation, or absorption through the skin or eyes. In addition, the site utilizes SOP – Process Spills in Cyanide Secondary Containment to address any spills within the process containment areas. These documents include specific emergency response procedures related to cyanide releases and cyanide exposures and are wholly intended to address cyanide related emergencies.

Turquoise Ridge has its own onsite capability to provide first aid and medical assistance to workers exposed to cyanide. The mine has a fully staffed emergency response team (ERT). Team members cover all four operating crews. Training for the ERT is provided on a monthly basis. Training includes medical/trauma response and firefighting, as well as specialized training in HAZMAT, confined space rescue, and technical rescue (high angle rope). ERT members have achieved different training levels, including emergency medical responders (EMR), emergency medical technicians (EMT), and Advanced EMT (AEMT), all of which are achieved through the National Registry of Emergency Medical Technicians (NREMT). The site also has a fulltime paramedic service to provide medical response to cyanide emergencies or other medical or trauma incidents.

In addition to the ERT, all personnel who work around cyanide are trained in basic first aid and response to cyanide exposure, including administration of oxygen, amyl nitrite, and use of an automated external defibrillator (AED).

If a cyanide exposure victim requires medical attention beyond the capabilities of the on-site medical facilities, the ambulance maintained at the site will transport the victim(s) to Humboldt General Hospital (HGH) in Winnemucca or rendezvous with local emergency medical services (EMS) or air ambulance, if required.

Turquoise Ridge is confident that the offsite medical facilities have adequate equipment, qualified staff, and expertise to respond to cyanide exposures. It is expected that any victim will be treated for cyanide onsite initially, and once they have been decontaminated, the paramedics will decide if transfer to Humboldt General Hospital is required to provide additional medical care. The ambulance is maintained at the mine site to transfer victims to the hospital, if needed. A

formalized agreement is in place with HGH, acknowledging their willingness and capability to assist in treatment of cyanide exposures, including retention by the facility of four cyanide antidote kits (Cyanokit) for use in an emergency. HGH is also equipped with a specialized decontamination room and equipment for further patient or personnel decontamination, if required.

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

Standards of Practice

7.1 Prepare detailed emergency response plans for potential cyanide releases.

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

Describe the basis for the Finding/Deficiencies Identified:

Turquoise Ridge has an Emergency Response Plan (ERP) and the Fluid Management System Operating Plan for Water Pollution Control Permit NEV0086018. In addition, Turquoise Ridge also utilizes the Operation, Maintenance, and Surveillance (OMS) Manual, Juniper Tailings Storage Facility (TSF). The documents include communication roles and responsibilities, evacuation procedures, required notifications, reporting procedures, incident categories and risk assessment. Sections within the ERP and Plans specifically address emergency response procedures related to cyanide releases and cyanide exposures. The various plans set out emergency response procedures for the mine sites, including cyanide releases. Procedures for initial response, first aid and spill response, and reporting are provided in the plans, as well as in SOP – Process Spills in Cyanide Secondary Containment.

The Plans outline steps and measures that would apply specifically to emergencies related to the Tailings Storage Facility (TSF). They detail communication procedures and outline steps to be taken for event detection and identify the level of severity and relevant actions to be taken, including shutdowns. The duties of the ERT and requirements for internal and external resources are also provided.

The documents also address potential cyanide failure scenarios including the catastrophic release of hydrogen cyanide, transportation accidents, cyanide releases on or off of secondary containment, fires and explosions, pipe, valve and tank ruptures, overtopping ponds or impoundments, power outages and pump failures, uncontrolled seepage, failure of the detox system, and failure of the TSF or heap leach pad.

Under the agreement between Turquoise Ridge and Cyanco as the supplier, Cyanco and TransWood (as transporter) are responsible for shipping of cyanide to site. This responsibility extends to consideration of transport routes, storage and packaging of sodium cyanide solution, the condition of transport vehicles and response in the event of an emergency or release during transport. As noted above, Cyanco and TransWood are certified in full compliance under the Code.

The ERP details responses specific to cyanide spills or leaks including mill solution and reagent spills and makes provision for initial response, first aid, spill reporting contacts and spill control and cleanup. The location of cyanide emergency equipment such as SCBAs, HAZMAT equipment, first aid equipment, etc. are also provided. AII ERT members are trained to respond to emergency incidents. The ERP provides responders rapid access to key information necessary to address a variety of potential emergency scenarios, including cyanide related incidents.

The ERP, OMS, and Fluid Management System Operating Plan (FMSOP) provides specific procedures related to the Tailings Management Area and provides for specific roles and responsibilities, resources to be allocated, lines of communication, and actions to be undertaken in the event of an emergency situations which include scenarios such as overtopping, embankment failures, and earthquakes.

Any potential emergency that has the potential to affect a community will trigger the notification requirements outlined in the Crisis Management Plan and ERP. The site will establish and follow the Incident Command System/Unified Command under the National Incident Management System, and the appropriate designated team member will notify all necessary parties, as required. Assigned personnel will contact emergency services, if necessary, and will inform potentially affected communities and parties.

7.2 Involve site personnel and stakeholders in the planning process.

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

Describe the basis for the Finding/Deficiencies Identified:

The Turquoise Ridge Complex involves its workforce in cyanide emergency response planning. During training of the ERT and after emergency mock drills, the workforce has the opportunity to provide feedback. Since all employees who work around cyanide are also trained in basic cyanide emergency response, those employees can also provide input in the process.

Turquoise Ridge has made potentially affected communities aware of the nature of their risks associated with accidental cyanide releases. The mine is approximately 30 miles northeast of Golconda and approximately 50 miles northeast of Winnemucca.

Turquoise Ridge includes external responders in ERP development/planning to a limited extent. The mine maintains periodic communication with community emergency response stakeholders through participation in the Local Emergency Planning Committee (LEPC). Further, the Humboldt County LEPC was party to development of the Tri-County Hazard Mitigation Plan, which considers all hazards, including cyanide transport. The site coordinates with LEPC and Humboldt General Hospital but they are not necessarily involved in ERP planning; however, the role of each of the outside agencies that may be involved in an emergency are indicated in the ERP, as is the party responsible for requesting outside assistance. Turquoise has a formal mutual aid agreement in place with LEPC to provide outside assistance to the site.

Local regulatory authorities, fire departments, and surrounding community partners are also members of LEPC and can provide their input to emergency planning that impacts the community, including feedback to the mine regarding emergency response and the use of cyanide. Turquoise Ridge engages extensively with local communities and provides information related to cyanide.

The Crisis Management Plan considers the participation of regulatory authorities, fire department, local hospital, and community partners. Coordinated exercises are conducted to evaluate the local response. Large-scale mock incidents involving multiple responding agencies, Cyanco, and TransWood, are periodically conducted to evaluate the response to cyanide related incidents.

The mine interacts with potentially affected stakeholders by regular communications and meetings with LEPC, local emergency responders, the hospital, and other community partners, as well as periodically engaging local partners to participate in tabletop exercises and emergency response drills. The site ERT personnel regularly interact with local emergency response partners and encourage their participation in training, such as mock drills. External responders will only be summoned when additional support is required to respond to an emergency, and as requested by authorized personnel managing the emergency.

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

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

Describe the basis for the Finding/Deficiencies Identified:

The ERP provides primary and alternate designation of responsible parties for the management of an emergency, including the General Manager who has authority to ensure that sufficient and adequate resources are allocated to carry out the ERP. The FMSOP also details responsible persons for the site.

An ERT roster, which is available with the management team, security, and as part of the Crisis Management Plan, lists all ERT members, department/crew, phone numbers, and radio channel. The roster also indicates the personnel identified as captains, co-captains, and members. Contact telephone numbers are provided for the ERT captains, who would be responsible for mobilizing the rest of the team if the Chief of Emergency Response is not onsite or is unavailable.

The Turquoise Ridge Operations Center (TROC) maintains contact information, including call-out procedures and 24-hour contact information for the ER Chief. The mayday procedure issues a call for resources over the radio, contacting personnel who are already onsite. The ER Chief or Captain will request additional resources, if required. Contact information for external resources is listed in the ERP and emergency response binder at TROC.

The ERP outlines the training that must be undertaken by the ERT and it is the responsibility of the Chief of Emergency Response to ensure that training is provided and maintained. The ER Chief has overall responsibility to ensure that the current ERT is current and viable and is supported by the General Manager. Training records reviewed during the audit indicate that ERT members received training, as required, during the recertification period.

Emergency response equipment lists including the locations of cyanide antidote kits are provided in the ERP, as well as on the inspection forms. The cyanide emergency response equipment is checked monthly by the ERT and records are retained for a minimum of 3 years. Equipment is also inspected on a regular basis as it is used by the ERT and during training sessions. The site paramedics inspect the ambulance and associated equipment, as well as the antidote kits and oxygen tanks.

Emergency response planning requirements have been confirmed with Humboldt Hospital in Winnemucca by means of regular communications and letters confirming willingness to support the operations by housing and maintaining proficiency training on the cyanide antidote kits. In addition, HGH EMS/Rescue, MedX AirOne, and others are part of the Emergency Response Plan and are included in coordination with LEPC. Despite the onsite capabilities of the ERT and paramedics, outside entities are engaged regularly and included in mock drills, as appropriate.

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

The operation is: ■ in full compliance
□ in substantial compliance

□ not in compliance with Standard of Practice 7.4

Describe the basis for the Finding/Deficiencies Identified:

The Crisis Management Plan provides the communication and notification process and procedures in the event of an emergency including requests for support from outside agencies, if necessary. Among other responsibilities, the General Manager oversees all operations at the facility during an emergency and is responsible for briefing other team members and notifying corporate personnel and determining whether activation of the crisis management team is warranted.

The External Relations Coordinator responds to media enquiries; the Health and Safety Manager advises when reporting to government agencies is required and requests mutual aid assistance if required. The Environmental Manager provides technical expertise related to emergencies which may impact the environment and is responsible for notifying the regulators when reporting is required. The ERP, FMSOP, and OMS provide contact information for the relevant regulatory agencies, outside responders and medical facilities.

The ERP and FMSOP contain procedures for communications and includes emergency response contact information. In the event of an incident, the site or crisis management team will contact relevant State and Federal regulators who will in turn notify affected parties in local communities as necessary. Procedures for notifying outside agencies and the media are provided in the ERP, FMSOP, and the Crisis Management Plan. Contact information of potentially affected communities and the media are included.

The ERP outlines the requirements for notifying ICMI in the event of a significant cyanide incident. Procedures and contact information for notifying ICMI of any significant cyanide incident is included in the plan. Turquoise Ridge has not reported any significant cyanide related incident during this recertification period.

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

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

Describe the basis for the Finding/Deficiencies Identified:

The ERP and FMSOP provide procedures in the event of cyanide release and addresses cyanide recovery and remediation if necessary. The ERP requires that any cyanide containing solution spilled in the process area but outside of a contained area at the mill, TSF, or leach pad be

placed on the leach pad or in the TSF. Any spills of cyanide solution within containment will returned to the process circuit through the use of the area floor sumps.

Cyanide impacted soils are to be excavated to depth of impact and deposited into the TSF or heap leach pad with repeated sampling until the cyanide levels are below 0.2 ppm WAD cyanide. Equipment decontamination is achieved through sufficient rinsing with water prior to beginning work.

Drinking water is prepared through onsite generation of potable water. In the event of an emergency, potable water could be trucked to site, if necessary. Bottled drinking water is also available in break rooms throughout the mine site.

Site SOP – Cyanide Solutions notes that sodium hypochlorite or calcium hypochlorite to destroy cyanide prior to spill remediation is permissible. While the reagents are not available on site, the procedure did not preclude the use of these reagents for cyanide releases into surface water or that have the potential to reach surface water. The SOP was updated to explicitly prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat any cyanide that would have been released into surface water or that may reach surface waters. As there are no surface waters within the vicinity of the operation that would be reasonably expected to be impacted through a release of cyanide.

The ERP and the Fluid Management System Operating Plan (FMSOP) outline procedures for responding to a cyanide release, as well as the cleanup methods and sampling requirements. The plans provide the State of Nevada prescribed verification requirement to confirm that adequate cleanup has occurred, requiring verification that residual impacted soils have a WAD cyanide concentration of less than 0.2 ppm. Excavation and sampling will continue until all samples achieve the required cyanide concentration.

For process solution spills, the ERP, SOP – Process Spills in Cyanide Secondary Containment and FMSOP require operators to immediately stop the release of material and provide immediate notification to the Area Supervisor or other responsible person. For reporting, the time of spill or when it was discovered is noted. Samples are collected and provided to the laboratory for analysis. Guidance for assessing the area of impact is provided. A spill report is then generated indicating the type and location of spill/discharge, the cause and the total area affected. Final sampling of the affected area is specified.

The Environmental Department would manage the characterization and remediation of any larger spills and is responsible for reporting spills to the regulatory agencies. In the unlikely event that cyanide was to be identified downstream of the tailings dam, the Environmental Department would plan a detailed sampling and monitoring program to investigate the extent of potential impact. The FMSOP includes routine groundwater sampling and regulatory reporting program for the installed monitoring wells. The sampling frequency and conditions are indicated in the FMSOP and if an event occurred, the sampling frequency could be adjusted to determine if any

potential impacts to groundwater have occurred. There is no surface water present in the areas that would be impacted by a spill.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Turquoise Ridge reviews the ERP annually, or as changes are made impacting the plan. The time the site has been in operation coupled with minimal cyanide related incidents are indications that cyanide is being properly managed, and the plan is working as required. The ERT routinely tests and reviews the adequacy of Emergency Response Procedures with drills and exercises. The Plan is also to be reviewed following implementation during any actual emergency. The Plan updates and reviews are conducted by multiple parties, including the health & safety manager, chief of emergency response, process operations manager, and surface operations manager. Final approval of plan changes is by the General Manager.

Turquoise Ridge performs cyanide emergency mock drills at least once per year and holds regular training sessions for the ERT. All site personnel, including the ERT, also undergo annual training in cyanide management and emergency response.

Some of the drills reviewed included scenarios of a tanker vs. forklift, haul truck vs. tanker, a Cyanco sponsored cyanide solution release drill that engaged multiple mine and county partners, and a series of tabletop exercises performed. Drills were reviewed covering all three years of the recertification period. Multiple mock drills included participation by the cyanide producer and transporter, as well as the local emergency services (EMS, hospital, fire, law enforcement, etc.). Drills are developed to include a variety of locations and scenarios including environmental release and exposure responses. Drills are developed in advance and risk assessed to minimize potential impact of event unpreparedness.

The ERP is reviewed and updated annually, at a minimum, or as necessary if changes are required or if events warrant review and update. During the recertification period, the plan has been reviewed and as required. No cyanide related incidents or releases have occurred since during the recertification period that would require implementation of the ERP.

ERT training exercises and mock drills were debriefed to identify and document improvement opportunities.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

All new hires, contractors and visitors at the Turquoise Ridge Complex receive an initial general induction training on health, safety and environmental matters before they can start working or enter the mine.

New workers at the mine, including both employees and contractors, receive orientation training in accordance with Mining Safety and Health Administration. All persons working on site must have undergone Part 48 New Miner Training or demonstrate having a valid annual refresher training certificate, documented on MSHA Form 5000-23. Surface New Miner training comprises 24 hours of orientation training addressing health and safety at surface metal mines. As the MSHA training covers general hazardous substance exposure, it may not specifically address cyanide. As such, all new employees receive cyanide specific training prior to beginning work. Process operations and maintenance personnel and those who are more likely to be exposed to cyanide, such as the ERT members, receive additional cyanide specific training.

The training on cyanide awareness for all employees covers general information related to cyanide, including uses, physical forms, smell, symptoms of exposure, routes of exposure, and exposure limits. For employees working in or around cyanide, additional training is provided which addresses, HCN monitors, addition points of cyanide in the operation, required PPE, pH controls, safety showers and eyewash stations, SDS information, routes of exposure, cyanide intoxication symptoms, first aid, cyanide antidotes, cyanide spill response, and sampling. The cyanide awareness training also includes a test administered to each employee to demonstrate an understanding of the training content.

Annual refresher training including cyanide and environmental modules are provided and completed every year to meet MSHA requirements. The annual training provided by Turquoise Ridge does include cyanide specific training, including properties of cyanide, hazards of cyanide, symptoms of cyanide exposure, emergency response, and first aid, including use of oxygen and amyl-nitrite. The training includes a written test.

ERT specific response training records are maintained by the Chief of Emergency Response. Records are available electronically through scans of documents and certifications for ERT members, as well as being tracked in the ERT training matrix spreadsheet, which is also managed by the chief. Cyanide hazard training for ERT members is administered and recorded in the same manner as for operations personnel, as noted above.

Training records, including cyanide hazard training for all employees who may be exposed to cyanide are retained by the process trainer in the form of electronic copies of the training in each employee's training record. The process trainer retains cyanide related training provided to process personnel, while the administrative service area retains training records for all other employees, including cyanide training schedules and records.

Records for new employee training including orientation training are retained in accordance with MSHA requirements and recorded on MSHA 5000-23 forms. Records are stored electronically in each employee's training file.

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

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

Describe the basis for the Finding/Deficiencies Identified:

New mill employees and any worker with cyanide related tasks receive specific training on SOPs and STPs that apply to their job position. This training is provided by the process trainer and supervisors on operating procedures including both general procedures applicable to all site areas as well as those specific to a task. The SOP and STP are used as a record of training and are signed by both the trainer and the trainee. Operators are also instructed how to conduct job task analysis, field level risk assessments, and area inspections, which are carried out within work areas. Training records are retained in a training file for each employee by the process trainer.

Supervisors coordinate with the training department to aid in operator training and advancement. Specific SOPs and STPs associated with each area are utilized to aid in the training. Operators are observed to ensure understanding of the process or task and demonstrate competency to the trainer or supervisor, as well as pass a computer-based test before receiving sign off on a given task. Once all tasks for a circuit are completed, an operator may be considered for advancement or transfer to another circuit.

Standard operating and task procedures define the steps required to complete a task and the SOP or STP itself is provided as training material with sign off required from both the trainer (supervisor or process trainer) and the trainee. The process trainer maintains records of the training requirements for each circuit and retains signed training records for each employee.

Training on specific tasks is generally provided by the process trainer or the supervisors; however, a lead or competent person may also provide the training. Supervisors are considered qualified to provide training based on experience. MSHA New Miner and Annual Refresher Training are required to be provided by an approved MSHA instructor. This requirement was verified by discussion with the process trainer and records review.

AII new employees are trained to receive a minimum specified level of site orientation, as required by MSHA, before being allowed to operate onsite. Training includes cyanide awareness training and, for those that will be working within the mill or heap leach pad facilities, specific training on relevant SOPs and STPs for the job duties that they will perform. In addition, employees must complete general and specific task training before being allowed to work alone.

Annual refresher training is provided, as required, by MSHA and includes a specific module on cyanide management covering physical and chemical characteristics of cyanide, cyanide handling, monitoring, control of pH levels, exposure limits, exposure symptoms, PPE, treatment, rescue equipment, safety showers, emergency warning systems, evacuation, disposal and spill procedures. In addition to refresher training, any changes to procedures, including those related to cyanide tasks, are reviewed and conveyed at shift safety meetings. Employees also undergo training on procedure changes, which are documented and retained by the process trainer.

Following new hire orientation and cyanide refresher training, employees complete a written test to demonstrate understanding of the material. Verbal, written, and computer-based tests to demonstrate understanding are undertaken for task training with sign off by both the trainer and trainee. Employees must also demonstrate competence in completing the task through observation by the trainer.

Employee activities and task competence are monitored by supervisors, or a lead person, conducting safety interactions with employees and ensuring task checklists and procedures are followed. Task observations are utilized at both the mill and heap leach facilities.

Training records are retained throughout employment history. MSHA training records are retained by the process trainer and retained electronically on the site data server. Employees are also responsible for retaining a copy of their most recent MSHA training certificate. Training records for each employee, covering all training they receive, contain the date, subject covered and are signed by both the trainer and trainee. Written, computer-based, and practical tests are completed to demonstrate the employees' understanding of the training materials.

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

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

Describe the basis for the Finding/Deficiencies Identified:

All operators within the mill and heap leach facilities, which includes cyanide unloading (reagent operator), process operations, and maintenance personnel, are provided with site-specific hazard training including cyanide awareness, hydrogen cyanide monitoring, emergency response, recognition of cyanide exposure symptoms, cyanide exposure first aid, the role and operation of rescue equipment, decontamination, and actions to be taken in the event of a cyanide spill including sampling.

Cyanide awareness training for employees includes actions to take in the event of a cyanide spill or exposure. Training also covers spill reporting, wildlife mortalities, and spill cleanup disposal. These elements are also covered in the MSHA annual refresher training, which all employees are required to attend. Employees who are actively working with cyanide are trained in bulk reagent offloading, including cyanide, cyanide equipment decontamination, and remediation of cyanide contaminated soils. Management and response personnel complete regular training drills in accordance with the ERP. All employees working around cyanide, including emergency response, unloading, production, and maintenance personnel, receive training in personnel decontamination and first aid procedures.

Site response personnel, including ERT members and operations and maintenance personnel, take part in routine drills to test and improve their response skills. Some of the drills reviewed included scenarios of HCN gas exposure, sodium cyanide solution exposure, vehicle accidents resulting in cyanide leaks, and cyanide exposure requiring confined space and technical rescue. After action reports document the lessons learned, including action items, which are tracked and followed up until closure.

Turquoise Ridge has an Emergency Response Team (ERT) on site, which is formed by personnel from different areas of the mine. ERT members are trained through participation in mock drill exercises as well as formal training programs. Formal training and certifications are in place for fire, first aid/medical, HAZMAT response, vehicle extrication, incident command, and technical rescue. Emergency responders are available on all shifts, including the full-time paramedics at site. All personnel working around cyanide are also trained in how to react in emergencies situations, including cyanide related events.

Emergency Response team members attend monthly training sessions during which cyanide exposure and emergency response topics are covered. Training sessions include the use and

inspection of response equipment. Records of training provided to the ERT members for the last 3 years, as well as equipment inspection documentation was available for review by the auditors and were found to be complete.

Turquoise Ridge has communicated the Emergency Response Plan with Humboldt General Hospital in Winnemucca. Regular communications are held with the hospital, during which cyanide emergency and response arrangements are discussed, including decontamination and transport procedures, the treatment protocol for cyanide exposure, and the onsite cyanide antidote kits. In addition, the mine coordinates with LEPC, which provides emergency response services from the county, if required. In the event of a medical evacuation from site, ground response is by the site ambulance, HGH EMS/Rescue if required, and air response is coordinated and executed by MedX AirOne.

Annual refresher training is provided as required by MSHA to employees and includes response to cyanide exposures and response to releases. The ERT completes monthly training sessions including recognition of cyanide exposure, treatment and first aid. Mock drills are also conducted at least once per year and involve operations and maintenance personnel, management, and the ERT. The site paramedics are certified by the National Registry of Emergency Medical Technicians (NREMT) and licensed as ambulance attendants by the State of Nevada. Refresher training, such as for firefighting or EMT/paramedics, may also be subject to specific training requirements to maintain certification.

Annual refresher training is provided as required by MSHA to employees and includes response to cyanide exposures and response to releases. A written test is also required for all attendees to demonstrate their understanding of cyanide safety. The training is documented on MSHA's 5000-23 form and includes the name of the trainer, date of the training, and name of the employee being trained. The training topics are outlined in the MSHA approved course curriculum. The ERT completes monthly training sessions including recognition of cyanide exposure, treatment and first aid. Mock drills are also conducted at least once per year and involve operations and maintenance personnel, management, and the ERT. The Chief of Emergency Response retails records for ERT members and documents the training topic(s), participants, and instructor(s) on training sign-in sheets.

9. DIALOGUE AND DISCLOSURE: Engage in public consultation and disclosure.

Standards of Practice

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 9.1

Describe the basis for the Finding/Deficiencies Identified:

Turquoise Ridge uses a variety of mechanisms to provide information to stakeholders related to cyanide management, including reports, meetings, and tours to the mine site. In addition, there is an open-door policy that allows stakeholders to engage with the site and voice any concerns.

Turquoise Ridge develops an Annual Report, as required for regulatory compliance, as well as an annual Sustainability Report. They also host quarterly community breakfast meetings, affording interested parties to attend and receive information in an open forum. A grievance procedure, including both an online form and phone number are available to the public. And new permits, as well as renewals are open for public comment. The auditors reviewed evidence of the reports and the quarterly meetings during the recertification period. Turquoise Ridge also regularly participates in local Chamber of Commerce and Rotary Club lunches.

The external relations group organizes tours for stakeholders to visit the mine, including schools, universities, state officials, communities, family members, and tourists. Public tours represent an opportunity for stakeholders to raise questions or concerns related to cyanide management. Tours for the general public (tourists) were suspended under the joint venture.

NGM operates social media pages that provide a means of stakeholder communication. Though the pages are not specific to the Turquoise Ridge, the administrators monitor the comments and would contact each site with specific issues, if necessary. The Barrick website also has contact information and provides means of engaging the community.

Many of the site personnel also participate in local committees, such as LEPC, the Chamber of Commerce, local fire and ambulance services, among others. These interactions also provide opportunities for stakeholder engagement regarding cyanide.

There is a grievance mechanism in place to receive, process, manage and resolve written or verbal complaints and grievances in a timely and consistent manner. The social responsibility team maintains a complaints and grievance register. A form is completed when the complaint is received including the interaction with the complainant, name, and contact information. A dedicated email address is also available for contacting the sites. Any grievances received are compiled into a monthly report. There have been no cyanide-related complaints or requests for information in the last 3 years.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Turquoise Ridge has developed and updated written and visual descriptions of how their activities are conducted and how cyanide is managed and has made them available to communities and other stakeholders. The information can be made available and distributed in different engagement opportunities including special meetings, presentations, quarterly community meetings, and job fairs, among others. Social media and the website offer additional sources of information for stakeholders.

No cyanide exposures or incidents resulting in hospitalization or fatality have occurred prior to or since the mine was first certified. If an event were to occur, communication to the public would be made per the Crisis Communication Plan within the Crisis Management Plan. Forms of public communications may include press releases, interviews, regulatory reporting, and inclusion of the event in the Annual Report. An event of this magnitude would involve an investigation by MSHA, who would also make information available to the public.

No cyanide releases off the mine site requiring response or remediation have occurred in the last 3 years. There is a procedure in place to respond to such a scenario. If an event were to occur, communication to the public would be made per the Crisis Communication Plan within the Crisis Management Plan. Forms of public communications may include press releases, interviews, regulatory reporting, and inclusion of the event in the Annual Report.

No cyanide releases on or off the mine site resulting in significant adverse effects to the environment have occurred in the last 3 years. If an event were to occur, communication to the public would be made per the Crisis Communication Plan within the Crisis Management Plan. Forms of public communications may include press releases, interviews, regulatory reporting, and inclusion of the event in the Annual Report.

Any spill over 500 gallons is immediately reportable to the State. Minor spills in excess of 25 gallons are reportable but included in quarterly reporting. In the last three years, two cyanide-related spills of process solution were immediately reported to the State, with 11 minor spills documented in quarterly reports. None of these spills were reportable to the Federal level or reportable to ICMI as a significant cyanide incident.

No cyanide releases that are or that cause applicable limits for cyanide to be exceeded have occurred in the last 3 years. If an event were to occur, communication to the public would be made per the Crisis Communication Plan within the Crisis Management Plan. Forms of public communications may include press releases, interviews, regulatory reporting, and inclusion of the event in the Annual Report.

Information regarding spills reported to the regulatory authorities can be made available to the public upon request. The annual report to the regulatory agencies can be made available to the public upon request. Significant cyanide incidents are documented by the company, identifying the site and nature of the incident; however, Turquoise Ridge has not experienced a significant cyanide related incident during the recertification period.