International Cyanide Management Code Mining Operation Recertification Audit

Summary Audit Report

Report Prepared for

Western Mesquite Mines, Inc

Equinox Gold Corp.

6502 E. U.S. Highway 78
Brawley, California 92227

Report Prepared by

Mountain Valley Professionals, LLC

MVP Project NO. P-EG-WM2023.57

June 13, 2024

Western Mesquite Mines, Inc.

International Cyanide Management Code

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Brawley, California 92227

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Operational Contact

Mine Operations:	Mesquite Mine
Mine Owner:	Equinox Gold Corp.
Name of Operator:	Western Mesquite Mines Inc.
Name of Responsible Manager:	Quirt Monchamp
Address and Contact Information:	Western Mesquite Mines, Inc. 6502 East US Highway 78 Brawley, California 92227-9306

Location and Description of the Operation

The Mesquite Mine is an open pit, heap leach operation located in eastern Imperial County, California alongside U.S. Highway 78 between the towns of Brawley and Blythe, south and adjacent to the foothills of the Chocolate Mountains. The mine site is approximately 35 miles east of Brawley, 24 miles north of the border with Mexico and 16 miles west of the border with the State of Arizona (see Figure 1). Access to the property is via good quality paved roads.

The Mesquite Mine is permitted for a total life-of-mine disturbance of 5,108 acres comprised of unpatented and patented mining lode claims, patented and unpatented mill site claims, leased State land, and fee lands.

Mining and processing activities began at the Mesquite Mine in 1985 and were discontinued in 2001, at which time the operation entered into a non-mining status although leaching and refining operations continued. In November 2003, the Mesquite Mine was sold to Western Mesquite Mines, Inc., a wholly owned subsidiary of Western Goldfields, Inc. and full mining activities resumed in January 2008. New Gold Inc. acquired the mine in June 2009 via a business combination with Western Goldfields Inc. Equinox Gold Corp. ("Equinox") completed the acquisition of Western Mesquite Mines, Inc. ("WMMI"), from New Gold Inc., on October 30, 2018. WMMI, Equinox's wholly owned subsidiary, holds a 100% interest in the property and operates the mine.

The Mesquite Mine utilizes blasting and a conventional truck and shovel open-pit mining method, hauling run-of- mine ore directly to leach pads for processing. Mineral processing is by heap leach, carbon-in-column ("CIC") circuit, desorption and recovery circuits and a refinery. The operation uses cyanide for mineral processing and practices continual vigilance in its storage, management, and use. The Mesquite Mine was first certified under the International Cyanide Management Code ("ICMC") in October 2011, was recertified in February 2015, May 2018 and June 2021.

The primary on-site processing facilities include heap leach pads, process ponds, pipelines and containment channels, a CIC plant [a.k.a., the New CIC ("NCIC") plant] desorption and recovery plant with refinery [a.k.a., ("Gold Plant")]. Mining infrastructure and equipment include multiple open pits, haul roads and ramps, maintenance shops, and the mobile equipment fleet.

FIGURE 1 - LOCATION MAP

Ancillary facilities include workshops, warehouses, administration buildings, and dry house facilities.

Seven heap leach pads are currently active at the Mesquite Mine (Pads 1 through 7). Over the years, these seven pads have been constructed in phases, with construction of the most recent pad (Pad 7) completed in April 2016. Leach Pad 7 extends over the area currently occupied by Leach Pads 1 through 4 as well the small "slot" infill area between these pads and Leach Pads 5 and 6. Ultimately, it will reach a maximum height of 400 feet, effectively consolidating these separate leach pads facilities into a single facility. The Vista Pad was decommissioned and deemed closed by the California Regional Water Quality Control Board, Colorado River Basin Region ("RWQCB") in May 2007. Each of the active leach pads are constructed with a composite liner system designed and approved in accordance with State requirements. A permeable geo-textile fabric overlying the composite liner serves to protect the synthetic membrane liner against puncture and to ensure collection of leachate solution from the base of the stacked ore. Ore is stacked on the liner system in 20-foot-high lifts to a height of 300 feet with total ore processing regulated to a maximum of 25 million tons annually from 65 million tons of total mine production (ore and waste). Side slopes of the stacked ore are maintained at an overall slope of approximately two horizontal to one vertical ("2H:1V").

The Mesquite Mine received 16-19 metric ton-loads of solid sodium cyanide briquettes delivered in specially designed ISO containers, each with a nominal equivalent liquid capacity of 18,000 gallons. The site has an on-site ISO dry storage area to accommodate delivery fluctuations and provide operational flexibility. The ISO's are removed from the storage area on-site and moved to the mixing area where it is parked on a concrete off-load apron (secondary containment area).

The Cyanide Mix Tank is filled to approximately three quarters of its capacity with water and adjusted to proper pH using sodium hydroxide (caustic) solution. The water in the mix tank is added to the briquettes within the ISO. The solution is circulated through the mix tank and ISO until the briquettes are fully dissolved with a target cyanide concentration of 23-30%. The sodium cyanide solution is then transferred to the Cyanide Distribution Tank for use in the process.

High-strength, sodium cyanide solution is metered from the Cyanide Distribution Tank into the Barren Solution Tank, at a flowrate to achieve the operational target concentration of ~350 ppm cyanide in the barren solution. After the sodium cyanide solution is pumped from the Cyanide Distribution Tank to the Barren Solution Tank, it is diluted by the recycled barren solution flowing at roughly 13,500 gpm. The resulting barren solution is pumped to the heap leach pads.

Sodium cyanide solution from the Barren Solution Tank, is applied to the ore on the leach pads using several methods: drip irrigation, sprinklers, leaching gold and silver from the ore. After passing through the ore via gravity, perforated piping installed below the stacked ore and above the primary synthetic membrane liner collects the gold and silver-bearing (a.k.a. pregnant) solution and conveys it to the lowest elevation within the heap leach pads, from which point it is piped to the NCIC.

At the NCIC Plant, gold and silver are adsorbed onto pelletized activated carbon within the columns, whereby the process solution becomes void of precious metals or "barren". The barren solution is then rejuvenated with fresh sodium cyanide, make-up water, treated for pH (to pH 10.4) and pumped back to the leach pads for additional leaching of ores. This process is repeated in a continuous manner.

The precious metal adsorbed onto the carbon in the NCIC circuit is collected and transported via a contained carbon transfer trailer to the on-site Gold Plant located near the administration offices. At the Gold Plant, the loaded carbon is washed with hydrochloric acid, neutralized, and the gold and silver is stripped off the carbon in a pressurized desorption column using caustic solution. The eluate passes through an electrolysis process (electro-winning cells) inside the refinery producing a gold and silver concentrate, which is heated in an induction furnace to produce gold/silver doré. WMMI ships the doré off-site to a refiner where the gold and silver are further refined to higher purity bullion. The carbon is then returned to the NCIC plant in the contained carbon transfer trailer.

During the previous audit cycle the Gold Plant began processing carbon from Equinox's Castle Mountain Gold Mine located approximately 320 road miles North of the Mesquite Mine. This activity continued throughout this audit cycle with carbon from Castle Mountain Gold Mine is collected and transported via a contained carbon transfer trailer and processed through the Gold Plant similar to the on-site carbon. The carbon is then returned to the Castle Mountain Gold Mine via the contained carbon transfer trailer.

Cyanide Facilities

The Code defines a "cyanide facility" as "a storage, production, waste management or regeneration unit for managing cyanide or cyanide-containing process solution," or "a pollution control device, equipment or installation used to prevent, control or minimize the risk of a cyanide release". The Code defines "process solution" as any solution with a weak-acid dissociable ("WAD") cyanide concentration of 0.5 milligrams per liter ("mg/L") or greater. Based on this criterion, the auditor identified the following primary, active cyanide facilities at the Mesquite Mine:

- ISO dry storage yard;
- Cyanide Mix Tank (18,000 gallons);
- Cyanide Distribution Tank (18,000 gallons);
- Barren Solution Tank;
- Barren Solution Sump;
- Barren Tails Box;
- Heap Leach Facilities (leach pads, pipelines and containment channels, process ponds);
    - Seven interconnected heap leach pads (Pads 1, 2, 3, 4, 5, 6 and 7) served by a single solution collection network (the Vista Pad was closed as of May 2007). Pads 1, 2, and 3 are covered by the synthetic liner for Pad 7 and Pad 4 are decommissioned;
    - Process solution ponds (Pregnant Pond, Barren Intermediate Pond, Event Pond, Pad 5/6 Event Pond);
    - Pregnant and barren solution transfer pipelines situated within lined secondary containment channels;
- Gold Plant;
- Pregnant Solution Sump;
- Pad 6 Sump (pregnant solution);
- Jacuzzi Sump (barren solution from 3-ton carbon columns)
- NCIC Plant (three trains, 15 carbon columns active);
    - Six 6-ton columns
    - Five 3-ton columns
    - Four 3-ton columns
    - Carbon Screens, and
    - Associated concrete and lined secondary containment structures, solution transfer tanks/vessels and pipes, valves, and pumps throughout the process areas.

It is important to note that the six initial leach pads, constructed over time, formed two active heaps separated by a "slot" area between.

Pads 1 through 4 formed one heap and Pads 5 and 6 formed the second. Pads 1 through 4 are located to the west of Pads 5 and 6. The most recent expansion, identified as Leach Pad 7, now extends over the area currently occupied by these two heaps as well the "slot" infill area between, effectively consolidating these two separate leach pads into a single facility. WMMI completed construction of Leach Pad 7 in April 2016, over top of Pads 1, 2, and 3. During the 2020 ICMC recertification audit, WMMI was leaching ore on Pads 5, 6 and 7.

Mesquite transfers loaded carbon, via a carbon transfer trailer, from the NCIC Plant to the Gold Plant located next to the refinery. The Gold Plant consists of the acid wash and strip circuits. Primary components of the wash/strip circuit include the acid wash vessel, strip vessel, and associated transfer tanks/vessels, concrete and lined secondary containment structures, process solution transfer pipes, valves, and pumps. WMMI uses hydrochloric acid and caustic solution to wash and strip the carbon, respectively, and does not add cyanide within the wash/strip circuit. However, carbon processed in the Gold Plant contains cyanide that produces process solution as defined by ICMC.

Two uses of cyanide at gold mines not presently evaluated under the Code include management of cyanide in laboratories and management of cyanide in gold refining. Therefore, the WMMI assay and metallurgical testing facilities and on-site refinery are currently excluded from Code requirements and were not part of this audit.

Auditor Information

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

The auditor has determined that the Western Mesquite Mine is in **Full Compliance** over this ICMC audit cycle.

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

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

Email: john.barber@mvp-nv.com

Audit Dates

The site visit for the Recertification Audit was undertaken over 4 days from November 13th – 16th, 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 (2021) and using standard and accepted practices for health, safety, and environmental audits.

Date: June 14, 2024

Operation Name: Western Mesquite Mines, Inc.

Signature of Lead Auditor: 

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PRINCIPLE 1 – PRODUCTION & PURCHASE

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

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

Cyanide purchased from Cyanco Company, LLC (Cyanco) originates from the Winnemucca, Nevada production facilities to the Western Mesquite Mine. Over the period reviewed during this audit cycle, cyanide was produced and supplied from the Cyanco Winnemucca Production Plant located in Winnemucca, Nevada. The Cyanco plant produces solid sodium cyanide briquettes and ships product direct to WMMI in ISO's. During this audit cycle, WMMI provided a Sales Agreement between Cyanco and WMMI for the supply and delivery of cyanide commencing January 1st, 2020, and was valid for a period of three years. The Sales Agreement was amended (extension) on January 1st, 2023, and is valid for three years.

The contract requires that Cyanco remain a signatory to the Code and that the cyanide purchased from Cyanco is manufactured only at facilities certified as being in compliance with the Code. Cyanco and its transporters (i.e., the entire supply chain) are certified in full compliance with the Code. The Cyanco Winnemucca production facility was initially certified fully compliant with the Code in October of 2006 and has maintained full certification, with the most recent certification date of January 13th, 2023.

Based on a review of Bill of Ladings, the site has purchased cyanide only from the Cyanco Winnemucca Plant during the audit period.

PRINCIPLE 2 - TRANSPORTATION

Protect communities and the environment during cyanide transport.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 2.1**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

Dry cyanide briquettes are shipped directly from the Cyanco Winnemucca production plant directly to the WMMI site by TransWood, Inc. TransWood is responsible for the mixing and offloading of cyanide at the WMMI off-loading facilities.

The purchase contract between WMMI and Cyanco states that the Seller is responsible for packaging, labeling, storage prior to shipment, evaluation and selection of transportation routes, transportation to the delivery location, mixing and unloading at the delivery location. In addition, Seller is responsible for safety and maintenance of the means of transportation throughout transport, task and safety training for transporters and handlers throughout transport, security throughout transport and emergency response throughout transport, all in accordance with applicable Principles, Standards of Practice, performance goals, audit recommendations, and certification requirements of the ICMC.

Review of the Bill of Ladings from June 2021 to November 2023 verify that WMMI cyanide supply has been exclusively from the Cyanco Winnemucca Production facility and exclusively transported by TransWood, Inc. out of the Winnemucca Terminal.

Cyanco provided the "Supply Chain of Custody Letter" (March 2021) and email from Mr. Steve Cochrane, Cyanco Sales Manager (November 2023). The Chain of Custody and email correspondence confirmed the supply chain logistics and that no intermediaries are included in the supply chain.

The TransWood, Inc. Winnemucca Terminal Operations have been found in full compliance with the ICMC since they were first certified on October 11th, 2006. The current Re-Certification was completed on November 30th, 2022, and the facility was found to be in full compliance to the ICMC.

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PRINCIPLE 3 – HANDLING & STORAGE

Protect workers and the environment during cyanide handling and storage.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

As documented in the 2018 and 2021 ICMI Recertification Detailed Audit Report (DAR), the facilities for unloading, storing, and mixing cyanide are designed and constructed in accordance with manufacturers' standards for these types of facilities. Additionally, the 2018 ICMI DAR documented the 2008 Risk Management Plan (updated September 2022) prepared in accordance with the California Accidental Release Prevention Program ("Cal/ARP") regulations, the cyanide off-load and storage facilities were designed in compliance with recognized and generally accepted good engineering practices, installed under permit through the Imperial County Building Department, and the installation meets the California Building Code and seismic zone 4 construction requirements.

WMMI contracted with Cyanco for supply of NaCN beginning on January 1st, 2020. Cyanco conducted a "Site Survey" in August 2019, to ensure the WMMI cyanide facilities were acceptable to Cyanco.

No modifications to the facilities have occurred since the previous audit in 2021.

The Mesquite Mine site is remote with limited off-site communities located nearby that could potentially be affected by a cyanide release. Off-site residences include the California towns of Holtville (27 miles away) and Brawley (32 miles away), both southwest/west of the site. The Glamis Dunes recreational area and the Glamis Beach Store are located approximately six miles southwest of the site along U.S. Highway 78. The Mesquite Regional Landfill facility, operated by Los Angeles County, is situated along the southwest perimeter boundary of the Mesquite Mine near the main entrance gate. Nonetheless, the landfill facility is located over one mile away from any on-site cyanide facilities and has been unoccupied and non-operational since its construction.

The unloading and storage (liquid and dry) areas reside within the secured mine facility, which is surrounded by an eight-foot-tall chain-link fence topped with razor wire. Security personnel staff the main entrance to the mine site 24 hours per day, seven days per week. No surface water bodies are located in the immediate vicinity of the Mesquite Mine.

The cyanide off-load and liquid storage facilities include a large, reinforced concrete apron on which the cyanide delivery trucks park during mixing and off-loading operations. The apron is large enough to accommodate the cyanide delivery truck and ISO. In addition, the slab has concrete curbing around its perimeter to contain any spills on the slab. During the field component of this ICMC recertification audit, the concrete apron and adjoining containment area were in competent condition.

During this ICMC recertification audit, the WMMI Process Maintenance/Building Service Manager indicated that WMMI uses an OptiSound® model level monitor, which has no manufacturer recommended periodic maintenance or calibration, as such the site maintains two spare units on site.

WMMI also has installed SOR® mechanized level gauges (i.e., float systems) with a "staff" indicator mounted on the outside of the cyanide and caustic tanks, which provide a visual check as confirmation that the OptiSound® systems are working properly. Although WMMI monitors the tank levels routinely as part of the cyanide off-load procedures. The inspection procedure for the tank leveling systems is incorporated in the Cyanco NaCN ISO Off-Loading Standard Operating Procedure and tracked on the NCIC Cyanco NaCN ISO Off-Load Inspection Form.

While WMMI does not have a procedure for routine maintenance of the level indicators, which have been operational over this audit cycle, WMMI routinely checks the indicator displays each shift and prior to cyanide deliveries and has

implemented procedures to prevent overfilling of the tanks during off-load and mixing activities. Furthermore, WMMI has redundant tank level systems on the cyanide tanks to verify that the equipment is functioning properly.

The cyanide mix and distribution tanks are located within a common, concrete, secondary containment area. The containment area consists of a reinforced concrete slab surrounded by 18-inch-high concrete curbing. The two tank foundations are solid mass, concrete pedestals, which provide an impermeable barrier between the tank bottoms and the ground (soil). During the field component of this ICMC recertification audit, the containment was in good repair.

TransWood, dedicated mixing personnel pick-up the ISOs from the on-site dry storage area and transports them to the cyanide mix area where the dissolution process takes place with the mix tank system. TransWood mixing personnel then return the rinsed and emptied ISO to the ISO dry storage area. The cyanide ISO off-load area and liquid storage facilities are located outside in an open-air environment. Cyanide storage consists of an isolated bermed area, with closed top, carbon steel, cyanide mix and distribution tanks. Therefore, adequate ventilation exists to prevent the build-up of hydrogen cyanide gas.

The ISO dry storage area is located within a bermed area to limit meteoric water run-on or run-off with a sloped-compacted soil floor to collect any precipitation falling within the bermed area – no surface water exists in the area. The cyanide mix and distribution tanks are closed- topped and located within a common, concrete, containment area.

Only properly trained and authorized personnel have access to the cyanide storage areas, off-load area and facilities.

The antiscalant used at the Mesquite Mine is acidic and is contained within its own area which has 42-inch-tall containment wall around the tank. The wall provides full secondary containment for the antiscalant and serves to adequately segregate the potential for cyanide entering the antiscalant containment area. As demonstrated in the 2018 audit cycle, the secondary containment systems provided for the cyanide and antiscalant tanks are adequately sized and function to prevent mixing. This was verified during the field inspection of the audit.

WMMI does not store any other incompatible materials at the ISO dry storage area, off-load and storage or NCIC Plant areas.

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

The operation is

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

Standard of Practice 3.2

Summarize the Basis for this Finding or Deficiencies Identified:

Over this ICMC audit cycle, WMMI received solid cyanide exclusively from Cyanco, delivered to the site in Solid-to-Solution ISO's. In all cases, the cyanide product is delivered to the ISO dry storage area. The TransWood mix operator transports the ISO from the dry storage area to the mixing area. Once the off-load is complete the TransWood mix operator transports the ISO to the dry storage area. The TransWood delivery driver will transport the empty and rinsed ISO back to the manufacturer for reuse. WMMI's written off-loading procedures require that the TransWood mix operator rinse any residual cyanide from the ISO following off-load events.

WMMI has developed and implemented written operating procedures to prevent exposures and releases during cyanide off-loading and mixing activities. The "Cyanco Sodium Cyanide Off-Loading Standard Operating Procedure" (SOP) includes systematic instructions for connecting hoses and operating pumps and valves during the off-load, mixing, and transfer of cyanide.

The site receives cyanide in ISO containers that are designed against incidental puncturing and damage during handling. In addition, the transporter TransWood handles all ISO movements and are trained in the proper handling of ISO containers.

The WMMI off-loading SOPs also provide general procedures for responding to leaks, overflows, or other incidents involving the off-load of cyanide. The delivery tank systems are equipped with an emergency shutoff device, there is a secondary emergency shutoff switch, the mix pump can be shutoff via the PLC system in the control room, and the delivery trucks are equipped with an emergency shutoff device. If an incident (e.g., spill, leak, exposure, fire or accident) occurs on site during the delivery or off-loading of cyanide, the WMMI operator is to contact his/her supervisor and/or the Health & Safety Department and reference the emergency contact information found on the bill of lading.

The WMMI Emergency Response Plan (ERP) includes detailed response procedures for cyanide solution spills. According to the procedures, in the event of a high-strength cyanide release, the mix operator and WMMI operator would attempt to stop the source of the spill via one of the emergency shutoff switches/devices discussed above. Additionally, WMMI would take immediate steps to evacuate and barricade the area to limit access. WMMI would notify the cyanide supplier and would take further action upon guidance provided by the supplier representative. Cyanco would mobilize an incident response team, if warranted.

Solution captured within concrete secondary containment would be removed directly back into the process circuit and then flush all concrete containment areas with fresh water. High-strength solution would be diluted as it flows to the adjoining lined pipeline containment channel, and the diluted solution would drain to the pond system for pump back into the process. If solution escapes concrete or lined secondary containment, WMMI would construct earthen berms to contain the solution for immediate pump back into the process. All solution in containment would be pumped dry or as low as possible. Following pumping, WMMI would implement its Environmental Policy, "Reporting a Spill/Material Release", which provides general requirements for reporting, cleaning up, and performing soil analyses following accidental spills outside of containment. To protect wildlife, WMMI would install temporary netting to cover any ponded solutions having WAD cyanide concentrations that exceed 50 mg/L.

The site SOPs require the use of proper Personal Protective Equipment ("PPE") and require a qualified spotter (WMMI operator) to be present during the entire off-load process. TransWood mix operators follow the written procedures and perform routine inspections of the off-load facilities and safety equipment prior to and throughout the off-load process (i.e., "NCIC Cyanco NaCN ISO Off-Load Inspection Form"). The Cyanco contract specified that the addition of colorant dye, for clear identification of high-strength cyanide solutions, is the responsibility of the manufacturer and is included in the manufacturer's packaging during loading at the manufacturer's facility, no colorant dye addition occurs at the site.

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PRINCIPLE 4 – OPERATIONS

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

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

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

The regulatory permits for the Mesquite Mine identify the assumptions and parameters on which the facility designs are based, and stipulate operating requirements for the process facilities. Principally, the Waste Discharge Requirements serve as the operating manual for the process facilities to ensure protection of water quality and the Conditional Use Permit requires safeguards to protect workers, communities, and wildlife. WMMI has constructed and operates its process facilities in accordance with these key permit stipulations.

Over this ICMC audit cycle, WMMI has continued to implement various procedures to identify when changes to processes or operating practices may increase the potential for releases and to incorporate the necessary release prevention measures. WMMI implements a change management process, which requires a risk assessment, assignment of action items, and approvals by the Health & Safety and Environmental departments for all changes, regardless of risk. As verification of implementation, WMMI provided change management documentation for a December 2023 change process.

In accordance with regulatory requirements, WMMI must provide notification and develop a proposed monitoring plan if cyanide is detected in the vadose zone monitoring wells. Operating permits also stipulate that the mine have backup emergency equipment to ensure that the ponds do not overflow; thus, WMMI maintains emergency generators on site as well as redundant pump systems and other critical equipment to manage solution flows during line power outages. Furthermore, WMMI implements contingency procedures for operating the pond system during upset situations. WMMI Process personnel check water/solution levels in the process ponds each shift to ensure that the ponds are operated below critical levels in order to maintain surplus capacity for the design storm event and heap draindown storage volume. During any closure event, whether temporary or permanent, WMMI personnel familiar operating the solution containment and pumping system, including the ponds, would remain on site full time to manage the solutions.

WMMI implements routine inspection and maintenance programs for the Mesquite Mine cyanide facilities, to ensure and document that the facilities are functioning within design parameters for proper management of process solutions. These programs involve inspections conducted each shift, monthly, and semi-annually covering process tanks; secondary containments; leak detection systems in the leach pads and process ponds; pond liners and water levels; pipelines, pumps and valves; and stormwater structures. In addition to routine monitoring of groundwater, stormwater and vadose zone systems, the Environmental Department conducts routine inspections of the perimeter fencing surrounding the mine site and the stormwater diversion structures. Furthermore, WMMI supervisors and the Environmental and Health & Safety departments (EHS Committee) perform "Oversight Inspections". Inspection forms and checklists document the date of the inspection, the name of the inspector and observed deficiencies, and in almost all cases, provide a section to record assignment of corrective actions and the completion date. Records of these inspections are retained. In the auditor's professional opinion, the inspection frequencies described above are sufficient to assure and document that the cyanide facilities are functioning within design parameters.

To supplement routine inspections, WMMI implements a preventative maintenance program for critical equipment related

to the safe management of cyanide solutions. Routine maintenance is performed on the large pump motors and corrective maintenance is performed on feed pumps, distribution pumps, sump pumps and other critical equipment when issues are identified by routine field inspections. Additionally, WMMI keeps redundant pump systems in stock at the on-site warehouse.

The primary power source for the Mesquite Mine is overhead line power from the local grid. In accordance with regulatory requirements, WMMI maintains diesel-powered generators at the NCIC Plant as a backup power source. The generators are sufficient to power all process pumps and equipment so that the process facilities remain fully operational during line power outages. Additionally, two small diesel-powered generators are maintained at the process ponds, which power the pumps at the Pregnant Pond and the Barren Intermediate Pond. WMMI performs routine electrical and mechanical maintenance inspections on the generators.

Mesquite transfers loaded carbon, via a carbon transfer trailer, from the NCIC Plant to the Gold Plant located next to the refinery. The Gold Plant consists of acid wash and strip circuits. The carbon from Castle Mountain Gold Mine is collected and transported via a contained carbon transfer trailer and processed through the Gold Plant similar to the on-site carbon. The carbon is then returned to the Castle Mountain Gold Mine via a contained carbon transfer trailer.

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

The operation is

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

Standard of Practice 4.2

Summarize the Basis for this Finding or Deficiencies Identified:

WMMI processes ore by heap leaching, as such, no mill processing, nor tailings are utilized.

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

The operation is

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

Standard of Practice 4.3

Summarize the Basis for this Finding or Deficiencies Identified:

In 2006, WMMI developed a comprehensive water balance model, using Microsoft Excel® software, to predict system performance during the active life of the proposed expansion of Heap Leach Pads 5 and 6. Specifically, the model was prepared for to estimate freshwater make-up requirements for the leaching circuit under average precipitation conditions using solution application by either wobbler spray or buried drip emitters, and to verify the adequacy of existing solution pond capacities for the planned expansion under the same conditions. In 2014, WMMI updated the water balance model to accommodate an increase in the design solution application rate. The model is designed to accommodate periodic updates during actual heap operations and to incorporate additional pad phasing, pond storage fluctuations, and climatic variations from computed averages for projected operational control of solutions.

The WMMI Process Metallurgist manages the water balance model and updates it as necessary to perform evaluations following significant storm events, as warranted.

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Inflows to the water balance system include moisture in the mined ore, precipitation on all lined areas, and freshwater make-up. Stormwater diversion structures and earthen berms are constructed around the perimeter of the heap leach facilities to prevent runoff from upgradient watersheds from entering the lined areas. Outflows from the water balance system include the moisture consumed in raising the moisture content in placed ore from the as-mined condition to the heap stack field capacity, and evaporation from application on the heap, from the heap surface, and from process pond water surfaces. The Mesquite water balance operates as a net evaporative system; i.e., under environmental processes, more water exits the system than enters the system. In order for the leaching circuit to operate correctly, additional freshwater must be introduced into the system.

In accordance with the Waste Discharge Requirements, the pond system must be designed to contain runoff generated by a maximum probable one-hour storm and 24 hours of draindown volume from the heaps, while providing two feet of freeboard. According to design documentation, the pond system is sized to contain runoff from the maximum probable 100-year, 24-hour event (4.96 inches) and 24 hours of draindown volume from the heaps, while providing two feet of freeboard.

WMMI Process personnel check water/solution levels in the pond system each shift. Slope measurements are taken, and the inspection log provides critical measurement values, which prompt operators to take action, such as pumping water to another pond as appropriate. Normal operating procedure is to start pumping out the ponds as soon as enough head is available to operate the pumps, with the goal of recycling water as much as possible.

WMMI utilizes generators as a backup power source and maintains redundant pumping equipment on site. Based on the conservative design capacity of the pond system, the water balance model itself does not directly consider the effects of power outages or equipment failures. Freezing and thawing conditions are not a factor at the Mesquite Mine and the operation is a zero-discharge facility (closed system) and does not employ treatment, destruction, or regeneration systems.

Average rainfall and pan evaporation data collected at the Brawley, California weather station over the period 1927 to 2005 was entered into the design model to account for water in the system, prior to the occurrence of the PMP event. The most recent updates to the design model, completed to evaluate the Leach Pad 7 expansion (2012) and an increase in the solution application rate (2014), also use data from the Brawley weather station over this same period. The Brawley weather station has compiled a long history of data and is located approximately 32 miles southwest of the Mesquite Mine site. Therefore, the precipitation data collected at Brawley is reasonably representative of the mine site. WMMI also collects precipitation data from an on-site meteorological station located near the front gate and began entering this data into the operational water balance model in 2015.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

An eight-foot-tall chain-link fence topped with razor wire surrounds the entire Mesquite Mine site. In addition to restricting public access, the fence is designed and regularly maintained to prevent access to the site by desert tortoise and larger terrestrial wildlife. There is no livestock in close proximity to the mine site.

The Pregnant Pond and Barren Intermediate Pond each have floating covers, designed to exclude wildlife and prevent evaporative loss. Additionally, the cover in the Pregnant Pond includes a netted port, which allows Process personnel to determine visually if there is adequate water in the pond to operate the pumps.

The two event ponds do not have floating covers or other wildlife deterrent systems as these ponds are normally kept dry and used for upset conditions.

Currently, WMMI utilizes the Pad 5/6 Event Pond as the first point of containment for excess solution from the NCIC Plant, which reports to the overflow pipe system located in the lined pipeline containment channel or to directly to the channel itself. WMMI pumps process solution captured in either event pond back into the process circuit as soon as

possible. If necessary, excess solutions from the NCIC Plant are also conveyed to the Pregnant Pond via the overflow pipeline located within the lined containment channel between the plant and the pond.

WAD cyanide concentrations are less than 50 mg/L in the pregnant solutions returning from the heaps and reporting to the transfer pipelines, collection and pipeline containment channels, and pond systems. WAD cyanide concentrations in the barren solutions are typically above 50 mg/L. WMMI normally returns barren solution to the heaps directly from the grate-covered Barren Tank at the NCIC Plant and keeps the Barren Intermediate Pond dry, utilizing it as an event pond and/or pump-back pond (even though the pond has a floating cover). Thus, open barren solution would only occur during non-routine (upset) operating conditions and occasionally when conditions cause temporary ponding on top of the heaps. Therefore, based on WAD cyanide concentrations in process solutions and management of process flows, other than the perimeter fence, WMMI does not implement or rigorously maintain existing deterrents to restrict access by wildlife (birds) to open waters in the collection and pipeline containment channels and in the process ponds.

During this ICMC recertification audit, WMMI provided analytical data from open water samples taken in the collection and pipeline containment channels and in the process ponds had a maximum WAD cyanide concentration of 1.97 mg/L with values ranging between 0.020 and 1.97 mg/L, which demonstrate that WAD cyanide concentrations did not exceed 50 mg/L over this 32-month period. As further verification, the auditor reviewed daily production reports provided for this audit cycle period.

WMMI implements wildlife mortality reporting procedures and submits a report to the Bureau of Land Management, El Centro Resource Area ("BLM") each month, regardless of whether mortalities occur.

Additionally, a WMMI internal report must be completed in the event of wildlife mortality.

WMMI Environmental personnel indicated that there were three wildlife cyanide related mortalities (birds), in the third quarter of 2021. The mortalities were the result of an upset condition causing high cyanide solutions to report to the pond system and not normal operations. During this ICMC recertification audit, the auditor reviewed "Wildlife Mortality Reports" completed over this period as further verification.

WMMI uses drip emitters to apply leach solution to the tops of the heaps and wobblers on the side slopes of heaps, where the potential for ponding is low due to the steep slopes. Drip emitters effectively eliminate overspray, and the auditor did not observe any overspray where wobblers or pivots were in use. WMMI indicated that minor ponding issues are common; therefore, WMMI implements written procedures to ensure that operators identify and remediate ponding conditions when they occur on the heaps. Additionally, WMMI Process operators are trained to monitor wildlife activity and mortalities, and to inspect heap leach facilities for ponding on a routine basis.

During the field component of this ICMC recertification audit, the auditor observed multiple areas of ponding on the heap where temporary netting, or other methods such as excavating surface trenches to reduce impounded solution, had been employed. Upon review of the daily inspection records, the operators had noted ponding on the heap on multiple days/shifts and had documented corrective actions.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

The Mesquite Mine is designed and operated as a zero-discharge facility (closed system) with no direct discharge to surface water. No surface water bodies exist in the immediate vicinity of the Mesquite Mine. Consequently, in accordance with its Storm Water Pollution Prevention Plan, WMMI monitors stormwater at several on-site sample points, quarterly and following precipitation events that generate adequate flow. WMMI submits annual reports to the RWQCB, which include WAD cyanide analytical results. Reports reviewed over this audit cycle included samples taken during 2021, 2022 and 2023 and all indicate that WAD cyanide levels were below the analytical detection limit (<0.01 mg/L) for all samples.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

The Mesquite process construction and operation include a number of seepage control technologies such as composite liner systems at the heap leach pads, composite liner systems with leak detection systems at the process ponds, lined secondary containment channels for solution pipelines, and concrete secondary containment in process areas. The pond system is sized to contain runoff from the maximum probable 100-year, 24-hour event and 24 hours of draindown volume from the heaps, while providing two feet of freeboard. The Pregnant Pond, Barren Intermediate Pond and Pad 5/6 Event Pond are constructed with double synthetic membrane liners with a leak detection system, between the liners. The pregnant and barren process ponds also have a synthetic membrane cover designed to exclude wildlife and prevent evaporative loss. The Event Pond was designed to function as a temporary storage outlet for excess runoff from the process areas and overflow from the process ponds; therefore, it is constructed with a single synthetic membrane liner and clay underliner with leak detection and does not have a synthetic membrane cover. WMMI installed a new synthetic liner in the Event Pond in 2008.

WMMI conducts regular inspections and monitoring of all process facilities to ensure that the operating criteria are being met. Routine visual inspections of the concrete secondary containments at the Gold Plant, NCIC Plant and the liner systems in the collection and pipeline containment channels and at the ponds are performed to ensure physical integrity of these protective systems. Additionally, WMMI routinely monitors a network of vadose zone wells at the leach pads, the leak detection systems at the ponds, and groundwater wells both upgradient and downgradient of the process facilities.

Groundwater across the Mesquite Mine site ranges between approximately 180 to 250 feet below ground surface (according to Waste Discharge Requirements) and flows in a southwesterly direction. The make-up water supply for the operation comes from three deep wells drilled into alluvium, approximately three miles southeast of the processing facilities. The beneficial use of the groundwater is Municipal Supply.

WMMI conducts groundwater monitoring both upgradient and downgradient of the process facilities in accordance with the RWQCB Monitoring and Reporting Program stipulated by the Waste Discharge Requirements. WMMI also routinely samples its vadose zone gas and bailer monitoring wells for hydrogen cyanide ("HCN") gas and cyanide solution, respectively. During this ICMC recertification audit, the auditor reviewed annual groundwater monitoring reports, submitted to RWQCB over the three-year audit cycle (2021 – 20222). Results indicate that Total and Free cyanide concentrations for all samples were below the detection limits, which varied between <0.005 mg/L and <0.1 mg/L.

The auditor reviewed monitoring logs and WMMI personnel indicated that no solution has been encountered in the vadose wells over this audit period.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

All cyanide mixing, storage and process tanks at the Mesquite operation are provided with concrete, secondary containment. During the field component of this ICMC recertification audit, the concrete containments were in good repair. Additionally, WMMI uses carbon steel and high-density polyethylene ("HDPE") piping materials and piping system components for conveyance of cyanide solutions and slurries. Cyanide storage and process tanks are carbon steel. These materials are compatible with cyanide and high pH solutions.

At the NCIC and Gold plants, the process tanks and vessels are set on solid mass, concrete pads or are supported above the concrete slab floor by steel structures. The entire process area provided for the Gold Plant and NCIC Plant are reinforced concrete pads with perimeter curbs. The cyanide mix and distribution tanks are located within a common, concrete, secondary containment area, consisting of a reinforced concrete slab surrounded by a concrete curb. The Cyanide Mix Tank and the Cyanide Distribution Tank are mounted on solid mass, concrete pedestal foundations, which provide an impermeable barrier between the tank bottoms and the ground (soil).

The 2018 ICMI DAR report confirmed that adequate containment for the cyanide mixing and storage tanks, as the surrounding concrete containment slab is keyed to the synthetic liner in the channel, providing another means of conveyance to the channel. The auditor verified that impermeable secondary containment exists from the cyanide offload area to the ponds. Furthermore, the surplus capacity provided by the pond system to account for the heap draindown volume provides ample secondary containment capacity for the cyanide tanks.

Similarly, the synthetic membrane lined, pipeline containment channel keyed to the north side of the concrete slab at the NCIC Plant provides overflow capacity for the curbed concrete containment provided for the carbon columns and related vessels and the new Barren Tank. Any overflow from the concrete apron provided for the cyanide delivery trucks and from the pregnant and barren solution sumps would also report to the lined channel. As discussed above, the lined containment channel reports to the process ponds, which provide ample containment capacity. The secondary containment volumes for the Gold Plant containment areas were confirmed to be adequate by a third-party engineer and presented in their report issued August of 2021.

For smaller spills, the concrete secondary containments provided for the cyanide process tanks at the Gold Plant, NCIC Plant and adjoining cyanide offload and storage facilities have concrete floor sumps with dedicated, automated pumps to collect and remove cyanide solution and slurry spillage for return to the process circuit. The containments and sumps do not have drains open to the environment. Daily visual inspections conducted by Process personnel include the physical integrity and available capacity of the secondary concrete containments, lined areas, and ponds. Therefore, WMMI does not implement written procedures for managing water/solution collected in secondary containments.

All process solution pipelines at the Mesquite operation are located within concrete or synthetic membrane lined secondary containment. Additionally, all pipelines are located above ground with the exception of a short segment of pipe running between the Event Pond and the Barren Intermediate Pond, which allows transfer of water from the Event Pond to the Barren Intermediate Pond via pumping, and a short segment running under the roadway at the Pad 5/6 Event Pond. These buried pipes are equipped with pipe sleeves, which provide secondary containment.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

Please refer to the Introduction for a list of the active cyanide facilities at the Mesquite Mine and to the previous ICMC Summary Audit Reports (August 2011, February 2015, May 2018, and June 2021) for discussion regarding the construction quality assurance and quality control ("QA/QC") documentation provided for the cyanide facilities in operation during those audits. The Gold Plant began processing carbon from Equinox's Castle Mountain Gold Mine in the fourth quarter of 2020. Cyanide is not used at the Gold Plant however; carbon contact water exceeds the ICMC process water value of 0.05 mg/l WAD. The entire Gold Plant process area was inspected, secondary containment volumes verified, and as-constructed drawings were developed. WMMI retained a professional engineer registered in the state of California to inspect the facilities and issued a report (August 2021) concluding that the continued operation of the facilities was protective against cyanide exposures and releases.

For this ICMC audit there have been no new cyanide facilities subsequent to the 2021 ICMC recertification audit.

WMMI has retained the original QA/QC documentation for cyanide facilities constructed prior to and subsequent to the 2011 ICMC verification audit. During this recertification audit, the auditor spot-checked construction reports for the heap leach and process facilities as verification. The documentation is archived in hardcopy and/or electronic format.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

WMMI has prepared and implemented written standard procedures for monitoring activities to evaluate the effects of cyanide use on wildlife and water quality. The monitoring plan provides standard procedures for monitoring water quality and describes the protocol to be followed during monitoring and sampling events of groundwater wells, vadose wells and the leak detection systems. The sampling procedures are in accordance with the California Code of Regulations. All other procedures are based on acceptable regulatory and industry standards.

WMMI implements wildlife mortality reporting procedures and submits monthly wildlife mortality reports to the BLM, regardless of whether mortalities occur. The daily leach pad inspections include wildlife presence and mortalities on the leach pads, where WAD cyanide concentrations typically approach or exceed 50 mg/L. During new hire training, WMMI employees are trained to observe and report wildlife presence and mortalities site wide on a continuous basis.

In accordance with the RWQCB Monitoring and Reporting Program, WMMI must conduct water sampling and analysis according to the most recent version of standard U.S. Environmental Protection Agency ("EPA") methods and use a laboratory approved by the California Department of Public Health. An established engineering and environmental consulting firm, originally developed the water monitoring procedures, based on the California Code of Regulations and other acceptable regulatory and industry standards. Qualified persons; i.e., the WMMI Environmental Manager and the Environmental Department personnel manage and administer the protocols.

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The water quality sampling procedures include a map showing sampling locations and list the groundwater monitoring wells, vadose monitoring wells, and the leak detection monitoring sumps along with the required monitoring method, monitoring frequency and reporting frequency required for each. These sampling procedures also include protocols for sample containers and volumes, sample labeling, sample preservation and storage, and field measurements (sampling conditions). The sample handling procedures describe the protocol to be followed for sample custody (chain of custody requirements), packaging and shipment. WMMI sends the water quality samples to an outside laboratory certified in the State of California for analysis.

In the auditor's professional opinion, WMMI's monitoring program is designed to adequately characterize environmental media (i.e., groundwater, stormwater, and wildlife mortalities) and to identify changes in a timely fashion.

PRINCIPLE 5 - DECOMMISSIONING

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

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

Over this ICMC audit cycle, the Mesquite Mine continued to operate under the consolidated closure and reclamation plan (March 2016, approved May 2018) and the Conditional Use Permit required WMMI to comply with all conditions.

The Consolidated Reclamation Plan was approved in May of 2018 and was prepared to consolidate the reclamation requirements of three separate reclamation plans for the Mesquite Mine, to resolve their contradictions, to update maps, reclamation techniques, and various statements of fact to current conditions and state of reclamation science, and to gather all permits, their conditions and mitigations, into a single document. At the time of this ICMC recertification audit, final approval of the Consolidated Reclamation Plan had been received in May 2018.

The Consolidated Reclamation Plan complies with the California Code of Regulations, BLM guidelines, the California Surface Mining and Reclamation Act ("SMARA") and the Conditional Use Permit for the Mesquite Mine, as do the three separate closure and reclamation plans. Additionally, closure items comply with heap leach closure requirements specified by the Waste Discharge Requirements.

The Consolidated Reclamation Plan provides written procedures to decommission cyanide facilities at the cessation of operations, including the heap leach facilities, the process solution ponds, and process solution piping.

The Consolidated Reclamation Plan provides a schedule summarizing the anticipated major closure and reclamation activities and their projected years of performance. Activities commence in 2017 and extend through year 2032, including final reclamation and closure monitoring and revegetation monitoring. Closure, monitoring and decommissioning of heap leach pads begins in 2017 and continues through 2027. WMMI updates closure and reclamation procedures as required for mine expansions. In accordance with the Mesquite Mine Expansion Project Reclamation Plan Permit, administered by Imperial County, WMMI must submit amendments to the approved plan, detailing proposed changes, for approval. WMMI updates the associated closure and reclamation cost estimate annually.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

WMMI retains a consultant each year to prepare an independent third-party update of both internal and bond- level reclamation cost estimates for the Mesquite Mine; i.e., the Mesquite Financial Assurance Cost Estimate. The 2023 estimate provides detailed costs for final reclamation and closure of the entire Mesquite site, including all cyanide facilities, and incorporates all assumptions contained in the Consolidated Reclamation Plan.

Costs for heap closure and surface reclamation activities have been separated for determining bonding requirements between different regulatory agencies. Estimates for existing and approved facilities and surface disturbance have been prepared to update the operation's existing surety bonds to reflect current conditions. The cost estimate covers the Consolidated Reclamation Plan.

The costs reflect third party implementation and include appropriate overhead cost burdens. For bonding purposes, the closure and reclamation scenario anticipates a third-party contractor conducting required work under the direction and supervision of the lead regulatory agency.

In accordance with SMARA, WMMI prepares annual updates to its Financial Assurance Cost Estimate for submittal to Imperial County Planning and Development Services. Following its review and acceptance, Imperial County forwards the estimate to the California Department of Conservation, Office of Mine Reclamation for final approval. In accordance with its Conditional Use Permit, WMMI must update the closure and reclamation cost estimate every five years, at minimum. As verification, the auditors reviewed WMMI copies of the Financial Assurance Cost Estimates for the year 2023 along with associated regulatory agency correspondence.

Three "Reclamation Bonds", held jointly by Imperial County and BLM, provide financial assurance for a variety of reclamation activities, including earthwork, building demolition and revegetation. Additionally, two "Closure Bonds", one held by RWQCB and one by BLM, provide financial assurance for treatment of process solution and other work to eliminate the risk of pollution (primarily to groundwater), which would include decommissioning of cyanide facilities.

In its August 30, 2022, ([sic] "2023") approval letter of the 2023 Financial Assurance Cost Estimate, Imperial County concurred with WMMI that the existing financial mechanism was sufficient to cover the 2022 estimate.

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PRINCIPLE 6 – WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

WMMI implements procedures describing how cyanide-related tasks are to be conducted. These procedures cover cyanide-related tasks such as, but not limited to, off-loading cyanide, plant and pond operations, and maintenance activities that involve the cyanide solution circuits. Additionally, WMMI implements a Confined Space Program for confined space entry requirements at the mine, including the process areas where cyanide is managed, and procedures to address equipment decontamination prior to maintenance. These procedures document equipment/PPE requirements, potential health and safety hazards, and operator instructions.

WMMI conducts inspections at the beginning of each shift, which include checking operation of showers and eyewashes, equipment condition, solution leaks and so forth. Prior to each off-load of cyanide, the delivery driver performs an inspection of the offload facilities, which includes housekeeping, shower/eyewash stations, fire extinguishers, cyanide mix pump, tanks, valves, hoses, pipes, and PPE.

WMMI continues to implement the Incident Reporting and Correction Action Program ("IRCAP"), that was established in 2014. As one component of IRCAP, WMMI has installed locked suggestion boxes around the mine offices, in which employees, visitors and contractors can enter IRCAP Forms documenting incidents and related suggestions for corrective actions and other comments.

Persons filling out the cards have the choice to identify themselves or remain anonymous. Next to the suggestion boxes, WMMI posts a summary of suggested actions and actions taken. WMMI personnel also indicated that annual refresher training and routine safety meetings provide additional opportunities for workers to provide input.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

WMMI controls the pH levels in process solutions by adding sodium hydroxide (caustic) solution at the Cyanide Mix Tank and by adding lime to the ore prior to loading it onto the heap leach pads. WMMI personnel indicated that generally, the targeted pH levels for limiting the evolution of HCN gas are 12.0 during offloading and mixing activities and 10.4 for barren solution going to the leach pads. The pH level for pregnant solution returning from the leach pads is roughly 9.5.

During this ICMC recertification audit, the auditor spot-checked production reports over the period 2021 through 2023 to verify that the actual pH levels maintained in the process circuit are within the targeted range.

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The Mesquite operation has fixed HCN monitors installed at the NCIC Plant at the Gold Plant where HCN gas generation has been determined to be a potential concern. Monitors are located at the offload area and at the Barren Tank. The HCN monitor at the Gold Plant is located near the acid wash area. The fixed systems are each equipped with two alarm settings. Alarm 1 is set at 2.0 ppm and provides early warning of elevated HCN gas and allows operations the opportunity to investigate and respond to the cause of the HCN gas generation. While Alarm 2 is set at 4.7 ppm to protect worker safety and initiates an evacuation of the area.

Additionally, the Mesquite operation utilizes portable HCN gas monitors. WMMI process personnel wear portable monitors during their entire work shift, programmed to alarm when HCN gas concentrations reach 2.0 ppm. A second stage alarm triggers when HCN gas concentrations reach 4.7 ppm. During cyanide offloads, the delivery driver and WMMI spotter each wear portable monitors.

WMMI subscribes to a sensor exchange, whereby every three months, WMMI receives factory-calibrated sensors to replace the current sensors in fixed HCN gas monitors. Factory-trained personnel calibrate the sensors using appropriate equipment and procedures. Following installation of each calibrated sensor, WMMI performs a bump test. Prior to using the portable HCN gas monitors, WMMI performs bump tests each shift. The docking station automatically performs routine calibrations as required every 30 days. During this ICMC recertification audit, the auditor reviewed calibration records for both the fixed and personal monitors for the preceding 12 months. Records for the fixed and portable HCN monitors are maintained in separate electronic databases for a minimum of three years.

WMMI has installed signs advising workers that cyanide is present and of the associated dangers. During the field component of this ICMC recertification audit, the auditor observed the placement of warning signage to be generally good. Cyanide warning signs are posted at the main gate; at the NCIC Plant, Gold Plant, and cyanide offload and storage facilities, including on piping, tanks and vessels; and at strategic locations along roads leading to the heap leach pads, process pipeline containment channels and the process ponds. Signs prohibiting eating, drinking and smoking are posted at the cyanide offload and storage facilities and at the NCIC Plant. Cyanide storage and process tanks and piping are labeled and/or painted to alert workers of the contents and flow directions.

In addition to signage, the cyanide-related procedures document equipment/PPE requirements, and with few exceptions, prohibit smoking, tobacco, eating and drinking.

The purchase contracts between WMMI and Cyanco state that the Seller (i.e., Cyanco) is responsible for the addition of colorant dye. The auditor reviewed the site SDSs for liquid cyanide which indicated that the liquid cyanide color was red.

During the field component of this ICMC recertification audit, there were three emergency shower stations located at the NCIC Plant; at the west end of the cyanide offload and storage facilities next to the caustic storage tank, at the east side of the Barren Tank and at the east end of the 3-ton carbon column train. The Gold Plant has shower/eyewash stations available in key areas. Each shower station is connected to a freshwater circuit and equipped with an eyewash unit. The auditor observed five additional self-contained, portable NCIC circuit area, including on each end of the upper decks of the carbon columns. A self-contained portable eyewash unit is also located at the process ponds. Process operators check the units daily (each shift) during routine inspections. The auditor spot-checked the showers and several eyewash stations, and those checked were functioning properly.

The fire extinguishers spot-checked at the NCIC Plant and Gold Plant were Purple K / Dry Chemical and the units observed had current inspection tags and were easily accessible. Only dry units are located where cyanide is handled. WMMI checks fire extinguishers daily (each shift) during routine inspections. Additionally, WMMI inspects the hydrants more thoroughly each month. Records were available covering inspections conducted over this audit cycle.

WMMI maintains Safety Data Sheet ("SDS") information electronically using a chemical management software application. SDS information for on-site chemicals is available to all employees site wide, 24-hours per day, via the WMMI intranet. SDS information is in English, the language of the workforce. Additionally, hardcopy SDS is available in the NCIC Plant control room, the Process Department offices, the laboratory, and the Refinery control room.

First Aid procedures for treating cyanide exposure caused by inhalation, swallowing and skin absorption are posted on signs at the NCIC Plant, Gold Plant, and at the cyanide offload and storage facilities.

WMMI implements IRCAP to administer incident reporting and investigation processes.

The program defines training requirements, assigns responsibilities to supervisors, managers, the Incident Investigation Team, the Health & Safety Department, and the General Manager, and provides the procedure for investigating and evaluating incidents with the intent to determine root causes, appropriate corrective actions, and effectiveness of remedial or control measures implemented.

During this audit the site Sr. Health and Safety Coordinator reported the site has not experienced a health or safety incident required use of the investigation and external reporting process. Based on interviews with site personnel the site has not experienced a significant worker health or safety incident.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

The Mesquite operation has three cyanide antidote kits, located in process areas, the on-site laboratory and the on-site Mine Emergency Response Vehicle ("MERV1"). The kits are stored in locked, glass-front cabinets within temperature-controlled environments. Each kit includes amyl nitrite ampoules, a Nithiodote™ kit (intravenous Sodium Nitrite and Sodium Thiosulfate) and activated charcoal. WMMI stores medical oxygen kits with resuscitators in dedicated carrying cases, with each cyanide antidote kit. Potable and/or bottled water and emergency shower and eyewash stations are available at or nearby the antidote kit locations. Site personnel are trained in the administration of amyl nitrite, while the Nithiodote™ kit (intravenous Sodium Nitrite and Sodium Thiosulfate) requires a trained offsite responder to administer.

The WMMI Health & Safety Department conducts monthly inspections of the cyanide antidote kits to verify that the antidotes, oxygen kits, and supplies are stocked, operational and within expiry dates, and replaces the items as needed. The auditor inspected the antidote kits located at the NCIC Plant and in the ambulance. The antidotes, oxygen kits, and supplies were stocked, operational and within expiry dates. The Mine Emergency Response Team ("MERT") members perform routine inspections of emergency response equipment and assessments of emergency response capabilities and preparedness. Inspections cover equipment and first aid/rescue supplies.

The primary means of communication while on site is the radio system. Process operators, supervisors carry and each vehicle is equipped with a radio. Additionally, the NCIC Plant control room has a landline telephone and cellular telephones are accessible, if needed. WMMI escorts cyanide delivery drivers in and out of the mine site and a WMMI Process operator stays with the mix operator throughout the off-load process.

The WMMI ERP provides first aid response and symptoms. First aid procedures include cases of inhalation, swallowing and skin absorption for victims fully conscious, unconscious and not breathing. Procedures also include proper administration of amyl nitrite in cases where the victim is breathing or not breathing. The ERP also contains response procedures beyond first aid including contacting offsite ground and air ambulance services for transportation of workers exposed to cyanide to a qualified medical facility. Additionally, WMMI has posted signs at the NCIC Plant, Gold Plant, and the cyanide off-load and storage facilities, which alert personnel of cyanide and provide instruction regarding recognition and treatment of cyanide overexposure.

At minimum, two MERT members are available for response on each rotating 12-hour shift. Additionally, WMMI maintains a fully equipped ambulance (MERV1) on site for use during first response and for transporting victims to outside medical help.

The closest hospital to the Mesquite Mine is the Pioneer Memorial Hospital in Brawley, California. As discussed in the WMMI 2018 Detailed Audit Report Final, WMMI has made formal arrangements with Pioneer Memorial Hospital through a series of letters exchanged with the hospital in September 2014 and January 2018.

Additionally, in August 2023, WMMI partnered with Cyanco to provide training sessions for key from the Imperial County Fire Department, the Rural Metro Fire Department, the Air Pollution Control District, local emergency services, the Department of Toxic Substance Control Certified Unified Program Agencies, Imperial County Public Health Department – Emergency Management Services and the Regional Water Quality Control Board.

The first session focused on basic cyanide awareness, emergency response, first aid and medical response awareness. The second session focused on cyanide toxicology and medical treatment.

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PRINCIPLE 7 – EMERGENCY RESPONSE

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

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

The Mesquite Mine ERP addresses potential accidental releases of cyanide. The WMMI Health & Safety and Environmental departments administer the ERP to address emergency response and mitigation measures. Development and implementation of the ERP is a requirement of Federal, State and Local Authorities and Equinox Gold, Inc.

The ERP is coupled with the Equinox Gold Corporate Crisis Management Plan (CMP) to deal with response/mitigation to emergency situations and will be administered by the Safety and Environmental Departments. The ERP was developed and implemented for planning of potential emergencies to reduce the impact of any significant adverse event.

Implementation of the CMP is required when an incident of significant magnitude threatens to overwhelm the resources of and/or has far-reaching consequences for the company based on specific criteria set out in an "Incident Assessment and Response Matrix", a component of the Crisis Management Plan. Corporate staff will assist operating locations in a crisis situation. The ERP complements the CMP to provide emergency and first responder services at the incident location.

The current version of the ERP (dated March 2023) provides standard response guidelines for chemical releases, including cyanide. Cyanide release scenarios discussed include release of high-strength and low-strength cyanide process solution and spills of solid cyanide. The ERP also includes first aid response procedures for cyanide exposure scenarios.

Mining Condition S-22 of the Conditional Use Permit for the Mesquite Mine requires WMMI to implement a site-specific hazardous material handling and spill contingency plan. According to this regulatory stipulation, the plan must include arrangements for dispatching of a hazardous spill cleanup team in the event of any spillage within Imperial County of any hazardous materials enroute to the mine site and a procedure for immediately contacting appropriate agencies in the event of a spill, on or off site. S-22 also requires notification procedures should a breakdown of the transportation vehicle occur. WMMI personnel interviewed during this ICMC recertification audit indicated that the ERP and the Spill Material Release Policy fulfill these regulatory requirements (Mining Condition S-22).

The ERP does not specifically address catastrophic releases of HCN gas from storage or process facilities or releases of cyanide from transportation accidents. Catastrophic releases of HCN gas from storage or process facilities are not reasonably expected to occur at the Mesquite Mine, as all process facilities (with the exception of the refinery) are open-air. Pursuant to statutory obligations regarding Cal/ARP, WMMI completed a Risk Management Plan to evaluate impacts to off-site public receptors from potential cyanide release scenarios and determined that the endpoint for potential impact from a worse case release of HCN gas was well within the Mesquite Mine perimeter boundary. The ICMC-certified cyanide supplier (Cyanco) is responsible for emergency response throughout transport. WMMI does not employ cyanide treatment, destruction or recovery systems; therefore, failure of these systems does not apply to the Mesquite Mine.

The Mesquite Mine ERP provides procedures for emergency evacuation. Each WMMI department has a pre-designated and alternate assembly area in the case of an evacuation, and all personnel, vendors and/or contractors must check in with the area supervisor at the designated assembly location. The ERP also contains maps depicting evacuation routes and assembly areas for the various facilities and buildings. The Incident Commander is responsible for determining if the incident could threaten human health or the environment outside the facility. If the assessment indicates that evacuation of local areas may be advisable, the Emergency Coordinator shall immediately notify appropriate local authorities (i.e., the Imperial County Sheriff's Office).

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The Mesquite Mine ERP includes written procedures for responding to cyanide exposure victims, including first aid measures and the use of the cyanide antidote kits. The procedures replicate the signs posted at the NCIC Plant, Gold Plant, and the cyanide off-load and storage facilities, which alert personnel of cyanide and provide instruction regarding recognition and treatment of cyanide overexposure. The procedures list exposure symptoms, first aid procedures specific to inhalation, swallowing and skin absorption, and steps for administering amyl nitrite. For each exposure type, first aid and antidote instructions are provided for cases where the victim is fully conscious, unconscious/not fully conscious, breathing and not breathing. Rescue procedures include calling for nearby help, moving the victim to fresh air, quickly determining the victim's condition, giving first aid immediately and calling for trained medical help if necessary.

The Waste Discharge Requirements for the Mesquite operation stipulate remediation measures for responding to seepage discovered in the groundwater and vadose zone monitoring systems.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

The Mesquite Mine site is remote with limited off-site communities located nearby that could potentially be affected by a cyanide release. The nearest residential community of more than one or two rural homes is the City of Brawley, about 35 miles west of the Mesquite Mine, or Gold Rock Ranch RV Resort about 28 miles south of the Mesquite Mine. The Glamis Dunes recreational area and the Glamis Beach Store are located approximately six miles southwest of the site alongside U.S. Highway 78.

The Mesquite Regional Landfill facility, operated by Los Angeles County, is located along the southwest perimeter boundary of the Mesquite Mine near the main entrance gate. Nonetheless, the landfill facility is located over one mile away from any on-site cyanide facilities and has been unoccupied and non-operational since its construction except for monthly inspections and quarterly visits by landfill personnel. WMMI provides annual Mine Safety and Health Administration (MSHA) refresher training to the landfill representatives and invites them to Cyanide Stakeholders Meetings.

WMMI developed and implemented IRCAP in April 2013. As one component of IRCAP, WMMI has installed locked suggestion boxes around the mine offices, in which employees, visitors and contractors can enter IRCAP Forms documenting incidents and related suggestions for corrective actions and other comments. Persons filling out the cards have the choice to identify themselves or remain anonymous.

Due to the remote setting of the Mesquite Mine, WMMI expects to be the primary responder for all types of incidents and does not designate any responsibilities to outside communities. The ERP provides contact information for local outside responders, including ambulance services (ground and air), fire services, California Highway Patrol, Cyanco, medical facilities (in Brawley and Yuma), and the Poison Control center. Additionally, the ERP provides contact information for appropriate federal, state and local agencies and emergency services. WMMI personnel indicated that, as a component of the Hazardous Materials Business Plan, WMMI provides the Department of Toxic Substance Control California Certified Unified Program Agency (Imperial County CUPA Office) with an electronic copy of the Mesquite ERP, which in turn, maintains centralized data accessible to outside responder.

WMMI provides the public with opportunities to communicate issues of concern through various means. Additionally, the regulatory process for new permits and permit revisions provides opportunity for public review and comment associated with potential releases. The Waste Discharge Requirements permit is renewed periodically, and each renewal provides a formal opportunity for public comment. The most current update to the Waste Discharge Requirements occurred in May 2014. Revisions to the Mesquite Mine Conditional Use Permit in 2023 provided formal opportunity for public comment during this current ICMC audit cycle.

WMMI generally conducts Emergency Service Meetings with outside responders annually, which serve to coordinate response services and associated training between WMMI and outside responders. In addition, the Imperial County Fire Chief provides monthly training for the MERT.

WMMI conducted a Cyanide Stakeholders Meeting in September of 2023.

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Emergency response procedures developed for the Mesquite Mine do not designate any responsibilities to outside communities. The Imperial County Sheriff's Office is the primary contact for outside responders. Once contacted by WMMI, the Sheriff's Office will contact their contracted Ambulance Service, the Imperial County Fire Department or Air Ambulance Service for activation and response.

As discussed in the Detailed Audit Findings Report prepared for the 2021 recertification audit report, WMMI continues to have dialogue with Imperial County outside responders, including the Sheriff's Office and Fire Department. Additionally, WMMI conducts Annual Emergency Training with outside responders annually, which serve to coordinate response services and associated training between WMMI and outside responders, including the Imperial County Sheriff's Office. In addition, the Imperial County Fire Chief provides monthly training for the MERT.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

The ERP establishes an Incident Command System, which is an organized system of roles, responsibilities, standard operating procedures and guidelines used to manage and direct emergency operations to respond and mitigate emergency incidents. Initially, the supervisor in charge of the area where an incident occurs assumes the role of Acting Incident Commander. The Area Supervisor is the designated Incident Commander, and the Area Lead Person is the Alternate Incident Commander. The Incident Commander is responsible for the site-wide emergency activities. The ERP designates Incident Commanders and technical advisors for anticipated emergencies at the site, and their associated responsibilities are described under the standard operating procedures for various emergency incidents.

The "Crisis Management Plan" provides the roles, responsibilities, and contact information for the Crisis Management Team. WMMI has established a standing MERT designated to respond to all major emergencies. The MERT is comprised of employees who receive special training in mine emergency response activities including use of the mine's firefighting equipment, emergency responder or first aid/CPR/AED, hazardous materials first responder operations, and of employees with special skills.

The MERT functions as the primary responders to all emergencies (fires, explosions, accidents/incidents, employee entrapment and chemical material releases). At the time of this recertification audit, WMMI had approximately 28 MERT members trained to respond to cyanide exposures. All on-duty members of the team respond upon notification, and at minimum, two team members are available for response on each rotating 12-hour shift. The WMMI Occupational Health and Safety Specialist is responsible for maintaining a current list of MERT personnel. A current copy resides with the Occupational Health and Safety Specialist and the person on call. An electronic copy resides on the Equinox Gold intranet (SharePoint). WMMI does not include the contact list in its ERP for reasons of confidentiality.

The Health & Safety and Environmental departments administer the MERT training programs using both company and outside resources. In accordance with the ERP, MERT personnel receive training at least monthly on emergency response medical procedures, on effective firefighting techniques using WMMI equipment, on basic rescue procedures, and on hazardous material first responder operations. Additionally, MERT personnel periodically participate in incident enactments to prepare and train for potential emergency incidents, in evaluation and assessment processes, and in development and implementation of procedures and practices.

The ERP provides an Emergency Notification Procedure, including an Emergency Cell Phone Procedure in the event that the mine site experiences failure of the landline telephone system. The procedures include both telephone and radio contact information.

Any employee discovering a situation that escalates beyond a minor incident, injury or illness i.e., fire, explosion, personnel entrapment and environmental spills of liquids or gases will at once report it to his/her supervisor who will then take charge of the scene.

The ERP outlines emergency action procedures for a variety of situations and designates Incident Commanders and technical advisors for anticipated emergencies at the site, and their associated responsibilities are described under the standard

operating procedures for various emergency incidents. The "Crisis Management Plan" provides the roles, responsibilities, and contact information for the Crisis Management Team.

The ERP lists "Mine Emergency Response Equipment" and "Emergency Spill Response Equipment" and the locations of the equipment. The spill response equipment list includes PPE locations (i.e., the Health & Safety Office, Mine Emergency Response Vehicle, and the Warehouse).

MERT members perform routine inspections of emergency response equipment and assessments of emergency response capabilities and preparedness. Inspections cover equipment and first aid/rescue supplies and are documented on various inspection forms specific to the equipment. As verification, the auditor reviewed inspection records for the cyanide antidote kits, oxygen kits, SCBA equipment, emergency showers/eyewashes, portable fire extinguishers, and the ambulance (MERV1).

The Incident Commander, his or her designee, or the Acting Incident Commander will contact outside agencies or personnel for assistance. The Imperial County Sheriff's Office is the primary contact for outside responders. Once contacted by WMMI, the Sheriff's Office will contact their contracted Ambulance Service, the Imperial County Fire Department or Air Ambulance Service for activation and response. The Incident Commander will direct outside responders as appropriate for the incident at hand.

WMMI personnel indicated that, as a component of the Hazardous Materials Business Plan, WMMI provides the Department of Toxic Substance Control (Imperial County CUPA Office) with an electronic copy of the Mesquite ERP, which in turn, maintains centralized data accessible to outside responders. Additionally, WMMI provided letters to Pioneer Memorial Hospital notifying the hospital that it could potentially be asked to treat cyanide exposure victims from the Mesquite operation and that WMMI understands that the hospital has adequate and qualified staff, equipment and expertise to treat such patients.

The letters also explained that WMMI has antidote supplies on hand, which would accompany any potential victim transported to the hospital.

While the Emergency response procedures developed for the Mesquite Mine do not designate any responsibilities to outside entities, WMMI has established dialogue with Imperial County outside responders, including the Sheriff's Office and Fire Department. Furthermore, WMMI generally conducts Emergency Service Meetings with outside responders annually (September 2023), which serve to coordinate response services and associated training between WMMI and outside responders, including the Imperial County Sheriff's Office. The Imperial County Fire Chief provides monthly training for the MERT at site.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

The ERP provides procedures for incident reporting and investigation, including internal and external emergency notification to management personnel, outside responders, and federal, state and local regulatory agencies and emergency services. Detailed contact lists for these entities are provided in the ERP. The "Crisis Management Plan" provides the roles, responsibilities, and contact information for the Crisis Management Team.

The Mesquite Mine site is remote with limited off-site communities located nearby, which could potentially be affected by a cyanide release. Therefore, other than for outside responders and the media, the ERP does not provide procedures and/or contact information for notifying potentially affected communities of cyanide-related incidents.

The Imperial County Sheriff's Office is the primary contact for outside responders. Once contacted by WMMI, the Sheriff's Office will contact their contracted Ambulance Service, the Imperial County Fire Department or Air Ambulance Service for activation and response.

Only the Incident Commander, his or her designee, or the Acting Incident Commander will contact outside agencies or

personnel for assistance. The Vice President/General Manager is responsible for handling all public informational needs, including coordination with the media.

The WMMI ERP and the Crisis Management plans include specific protocols to provide the ICMI with an initial report of a cyanide event. The protocol includes reporting within 24-hours by phone or email. The protocol includes the ICMI reporting number and email. Additionally, an outline of required information to properly report to ICMI is provided. No significant events, as defined by ICMI, have occurred at the site during this audit cycle.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

Cyanide solution released outside of containment would flow to soil in all cases, as there are there no surface water bodies located in the immediate vicinity of the operation and groundwater across the Mesquite Mine site ranges between roughly 180 to 250 feet deep. In the event of a cyanide solution release outside of concrete or lined secondary containment, WMMI would construct earthen berms to contain the released solution. Once contained, the solution would be pumped back into a concrete or lined containment area.

Following pumping, WMMI would implement its Environmental Policy, "Reporting a Spill/Material Release", which defines the endpoint of the remediation for contaminated soils; including how samples will be taken, what analysis will be performed, and what final concentration will be allowed in residual soil as evidence that the release has been completely cleaned up. In accordance with this policy, impacted soils would be sampled and all contaminated materials excavated and placed on the heap leach pads. For small spills, WMMI indicated that the contaminated soils would be excavated completely (i.e., dig to dry). Any adsorbents and containment materials used would be placed into barrels for off-site disposal.

WMMI personnel stated that a release from the operation could not reasonably adversely impact drinking water, as there are no drinking water supplies located near the Mesquite site. WMMI has three off-site wells located approximately three miles away on the south side of Highway 78, which are used for potable water and no other public wells are located nearby. The ERP limits remediation measures to soil excavation and removal (neutralizing agents are not used). The ERP or other procedures do not prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water, as there are no surface water bodies located in the immediate vicinity of the operation.

In accordance with the RWQCB Monitoring and Reporting Program, WMMI must report any accidental seepage, spillage, leakage, or release of "waste material" from the designated area within 48 hours after discovery and file a written with the RWQCB within seven days characterizing the discharge and describing corrective measures underway or proposed. If WMMI concludes that a release has occurred, it must take steps to perform monitoring and submit a Revised Report of Waste Discharge proposing an Evaluation Monitoring Program and submit a preliminary engineering feasibility study within 180 days for remediation.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

As stated in the ERP, the Health & Safety Department and the Environmental Department coordinate to update the ERP as needed. WMMI personnel indicated that the ERP is reviewed annually. Additionally, in accordance with the Equinox Gold "Crisis Management Plan", the Crisis Coordinators are responsible for ensuring that the "Crisis Management Plan" and the ERP are reviewed annually and revised as necessary. The ERP was initially developed in December 2007.

Subsequent updates, as indicated on the ERP cover page, occurred in October 2013, February 2014, August 2014, August 2014, November 2014, February 2015, February 2017, May 2017, February 2020, and most recently in March 2023. Equinox Gold last revised the "Crisis Management Plan" in February 2021. The "Crisis Management Plan" is uploaded onto the Equinox Gold intranet (SharePoint) and revision dates are in the system electronically.

The MERT performs periodic reviews of the ERP to assess and evaluate its suitability and adequacy during their monthly training sessions. According to the ERP, MERT personnel periodically participate in evaluation and assessment processes and participate in development and implementation of procedures and practices. During this ICMC recertification audit, WMMI indicated that MERT personnel currently review the ERP when significant changes on site occur (i.e. new equipment, a new process) and participate in routine training on the ERP procedures.

In WMMI's ERP, "MERT personnel will periodically practice on mock disasters to prepare and train for potential emergency situations, will participate in evaluation and assessment processes, and will participate in development and implementation of procedures and practices." WMMI conducts mock desktop or mock drills during their monthly MERT training sessions. Each year the 12 sessions over the year evaluates the entire ERP. A review of the ERP monthly training records for this audit cycle showed that the year over year monthly training records for each year, a minimum of four to seven monthly training events were mock drills that included field simulation exercises.

These desktop mock drills are "hands-on" and conducted to test response procedures for a cyanide exposure and release scenario and to determine if the MERT procedures are adequate and if personnel are trained properly. The mock drills, conducted throughout the audit cycle were conducted during routine MERT training sessions, included a field exercise, and focused on the more likely cyanide release or exposure scenarios, i.e., plant operator getting sprayed with reagent-grade cyanide solution or a release of cyanide solution outside of secondary containment.

The scenarios included mock MAYDAY calls, response to an exposure victim, in both conscious and unconscious states, and/or an unplanned release, deployment of the MERT team, MERV vehicles(s) and use of the cyanide antidote kit, loading of the victim onto a gurney and transport to the front gate. REACH – the air flight contractor participated in a session for an exposed worker transportation drill. The Imperial County Fire Chief conducts a significant portion of the monthly sessions.

The Health & Safety and/or Environmental departments are responsible for collecting all records and forms used during an emergency incident. WMMI uses this documentation for incident investigation, insurance claims, and potential legal actions. Department superintendents and managers, in conjunction with the Health & Safety and/or Environmental Manager(s), must also prepare a report documenting important activities that occurred during an emergency for submittal to the General Manager within 24 hours.

The Health & Safety and/or Environmental departments are responsible for ensuring that an incident investigation is conducted following significant emergencies. In accordance with the ERP, WMMI will investigate the incident as soon as possible following its occurrence. The investigation will focus on determining the root cause(s) of the incident and possible procedural or system modifications required to prevent a reoccurrence.

Critiques of incidents are required to review what actions took place during the incidents, both good and bad. Critiques are designed to allow for the flow of ideas and recommendations to improve the ERP and the operation's response policies and guidelines. An employee-debriefing meeting will be held to inform personnel about the events of an emergency and any hazards that may remain on the facility property following an incident.

During this ICMC recertification audit, WMMI personnel indicated that no significant emergency incidents have occurred since the 2018 ICMC verification audit, which triggered the review/investigation process established by its ERP. Therefore,

records of emergency incidents were not available for review.

In April 2013, WMMI developed and implemented IRCAP for the purpose of administering incident reporting and investigation processes. Under IRCAP, an incident is defined as "an event which results in harm or loss to persons, property, production or the environment, or where under slightly different circumstances (Near Miss) harm or loss may have occurred". The program defines training requirements, assigns responsibilities to supervisors, managers, the Incident Investigation Team, the Health & Safety Department, and the General Manager, and provides the procedure for investigating and evaluating incidents with the intent to determine root causes, appropriate corrective actions and effectiveness of remedial or control measures implemented.

PRINCIPLE 8 – TRAINING

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

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

WMMI trains all employees in cyanide awareness as part of new hire and annual refresher training. In 2020, WMMI developed the "Lime and Cyanide" presentation for cyanide awareness. To test retention of the material, students are required to complete the "Lime and Cyanide Safety Test" and must score a 100 percent on the exam. For both cyanide and lime, the presentation covers the history, how the chemicals are used at the mine site, the hazards, symptoms of exposure, and basic first aid.

The "Mesquite Mine Cyanide Safety Program" policy applies to all employees, contractors, vendors and visitors who have a potential for cyanide exposure, with the purpose to prevent and protect against cyanide-related injury and illness. In accordance with this policy, all new employees will receive cyanide awareness training upon induction and all process department employees and MERT members will received training on proper response to cyanide exposure emergencies, at least annually, utilizing the Cyanide First Aid training materials supplied by the manufacturer and the cyanide facts and safe handling training materials included in the Cyanide Safety Program document (Appendix A) and applicable SOP's to the duties the employee or MERT member will be performing. WMMI addresses the requirements of this policy in new hire and annual refresher training.

In addition to the new hire/induction training presentation, contractors working in cyanide areas receive site-specific training. WMMI supervisors provide cyanide awareness training and conduct a walkthrough of the area to introduce contractors to the cyanide facilities, safety shower and eyewash stations, and controls.

WMMI uses MSHA Form 5000-23 as documentation of new hire and contractor training. The auditor reviewed WMMI personnel files to verify that employees are receiving this training.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

WMMI requires completion of SOP "task training" forms for cyanide-related (and non-cyanide-related) work tasks. The forms document training dates and signatures of instructors and trainees. The initial training does not authorize trainees to perform the associated work tasks unsupervised. The trainee must complete the site cyanide task training requirements and receive an MSHA Form 5000-23 before performing tasks unsupervised. The auditor reviewed personnel files to verify that employees are receiving this training. As required by MSHA under the Code of Federal Regulations

(CFR); i.e., 30 CFR, Part 48 (Surface), employees must be provided safety training prior to working on work tasks including cyanide related tasks.

This task-specific training supplements the cyanide safety training provided to all employees.

The task training forms for cyanide-related SOPs identify the important elements necessary for each job. Additionally, WMMI implements a "Part 48 Training Plan" required by MSHA under the Code of Federal Regulations ("CFR"); i.e., 30 CFR, Part 48 (Surface). This plan identifies approved instructors and tasks covered under the different training programs (i.e., annual refresher, new miner, experienced miner, and task and hazard training).

The WMMI Lead Plant Operator provides the required task training, which includes review of the related SOP and hands-on demonstration, prior to new employees performing a work task unsupervised. The current Lead Plant Operator has worked at the Mesquite Mine since 1990 and is certified by MSHA as a qualified trainer. He also has Red Cross certifications in first aid, Cardiopulmonary Resuscitation and Automatic External Defibrillator.

WMMI provides task-related refresher training if workers change jobs/areas. Workers receive training on the associated SOP and spend time with the Lead Operator until familiar with the task. Additionally, if an SOP changes for any reason, workers receive new training on the task and related changes.

WMMI does not employ a formal examination or testing procedure (i.e., written exams or quizzes) for evaluating the effectiveness of task-related training. However, WMMI administers testing to evaluate the effectiveness of cyanide awareness and first aid training for cyanide awareness training courses.

Furthermore, WMMI implements an "Employee Contact/Job Task Observation" program whereby supervisors are required to perform "Field Level Risk Assessments" and observe employees performing job tasks on a routine basis. The Job Task Observation cards document the person initiating the contact; the employee contacted; conditions/practices observed; actions taken, recommended, or required; lessons learned, and follow up actions and completion dates.

The Health & Safety Department manages and maintains training records for all employees. Each employee file contains a history of training completed over the duration of employment. WMMI documents training via task training forms for SOPs and MSHA 5000-23 forms. The training records include the name of the trainer, date of training and topics covered.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 8.3**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The protocol for responding to cyanide releases and exposures is for workers witnessing the event to secure the area and notify their immediate supervisor. Any employee discovering a situation that escalates beyond a minor incident, injury or illness (i.e., fire, explosion, personnel entrapment and releases of liquids or gases) will at once report it to his/her supervisor who will then take charge of the scene. Upon identification of a major incident, an employee, vendor and/or contractor will initiate the emergency call-out procedure.

WMMI SOP's include task specific procedures, including decontamination (personnel and materials), in the event cyanide is released. These SOP's reference the WMMI ERP for additional procedures and notifications in the event of a cyanide release or exposure.

Process operations personnel are provided with training in task specific procedures and emergency response.

MERT personnel receive routine training regarding response techniques and use of response equipment, as well as annual refresher training, which includes emergency response and first aid. MERT personnel also participate in periodic drills to prepare and train for potential emergency incidents, in evaluation and assessment processes, and in development and implementation of procedures and practices. MERT training includes, but is not limited to, the use of SCBA, AED and fire equipment, administering amyl nitrite, confined space, and other emergency response equipment and techniques. MERT members also take routine inventory and perform restocking of the on-site ambulance (MERV1), emergency support vehicle (MERV2) or the emergency equipment trailer.

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Emergency response procedures developed for the Mesquite Mine do not designate any responsibilities to outside communities. Due to the remote setting of the Mesquite Mine, WMMI expects to be the primary responder for all types of incidents, and as per the Emergency Notification Requirements for the Mesquite Mine, WMMI would request outside resources as needed. The Imperial County Sheriff's Office is the primary contact for outside responders. Once contacted by WMMI, the Sheriff's Office will contact their contracted Ambulance Service, the Imperial County Fire Department or Air Ambulance Service for activation and response. For easy reference during an emergency the ERP provides latitude and longitude coordinates for the Mesquite Mine heliport and for each open pit area.

As discussed in the 2018 and 2021 DAR's, WMMI provided letters to Pioneer Memorial Hospital (dated September 26, 2014, and January 23, 2018) notifying the hospital that it could potentially be asked to treat cyanide exposure victims from the Mesquite operation and that WMMI understands that the hospital has adequate and qualified staff, equipment, and expertise to treat such patients. The letter also explained that WMMI has antidote supplies on hand, which would accompany any potential victim transported to the hospital.

WMMI also partnered with Cyanco in 2023 to provide training to key regulatory stakeholders, MERT team members and process operators on basic cyanide awareness, emergency response, first aid and medical response awareness, cyanide toxicology and medical treatment.

Additionally, as a component of the Hazardous Materials Business Plan, WMMI provides the Department of Toxic Substance Control (Imperial County CUPA Office) with a copy of the Mesquite ERP, which in turn, maintains centralized data accessible to outside responders.

MERT personnel also participate in periodic drills to prepare and train for potential emergency incidents, which include cyanide exposures and releases.

The Health & Safety Department manages and maintains training records for all employees. Each employee file contains a history of training completed over the duration of employment. WMMI documents training via task and ERP training forms for SOPs and MSHA 5000-23 forms. The training records include the name of the trainer, date of training and topics covered. As verification, the auditor reviewed the personnel files for multiple employees and a contractor. For all employees reviewed, their training files contained documentation for their entire employment at the Mesquite Mine.

WMMI administers testing to evaluate the effectiveness of cyanide ERP and first aid training. The results of the tests are retained in the employees' personnel file for their length of employment.

PRINCIPLE 9 – DIALOGUE & DISCLOSURE

Engage in public consultation and disclosure.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 9.1**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The WMMI Community Relations Manager is tasked with ensuring that WMMI remains actively engaged in the local and regional community and serves as the primary point of contact with respect to inquiries or complaints regarding the operation. The Community Relations Manager position is full-time and based at the Mesquite Mine.

Stakeholders have the option to email or call WMMI and contact the full-time Community Relations Manager who performs outreach and is accessible to stakeholders through many different avenues. The Community Relations Manager serves as the channel of communication between stakeholders and WMMI. Regulatory agencies have the authority to inquire and often inspect cyanide management facilities and operational practices. WMMI's Community Outreach Plan and WMMI Compliant Flow Procedure provide the foundation of WMMIs Stakeholder management.

The Community Outreach Plan shows that WMMI understands the demographics of their stakeholders and the history of the area and how that might shape their opinions regarding the Mesquite Mine. They have built their outreach activities with that in mind.

WMMI provides several means for stakeholders to communicate issues of concern regarding cyanide use and management at the Mesquite Mine. This provides the opportunity for WMMI and stakeholders to have two-way communications on site cyanide management practices. Those discussed include:

- Hosting periodic Cyanide Stakeholders Meetings, which include Cyanide Awareness Training conducted by Cyanco;
- Giving regular presentations to civic-oriented groups, such as rotary clubs and the Kiwanis;
- Giving regular presentations to the Board of County Commissioners;
- Hosting and participating in career fairs;
- Providing tours of the Mesquite operation to WMMI family members; and
- Routine meetings with key stakeholders such as the LA County Landfill and representatives from the local Native American tribe.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 9.2**
- ☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

Equinox Gold discusses their Water and Cyanide Management on their website, "Equinox Gold's water management strategy is focused on protecting the quality of local water resources and minimizing the amount of water used to maintain operations. We strive to both reduce our water use and to recycle water where possible. Our sites comply with all required discharge and prescribed water quality standards, although most of our sites are zero-discharge. Equinox Gold is a signatory to the International Cyanide Management Code, which commits the Company to applying leading practices in the transport and safe use of cyanide and also to implementing programs to monitor for cyanide in both surface water and groundwater at all of its sites."

See more at:

- https://www.equinoxgold.com/responsible-mining/environment/

The written regulatory permits and permit applications, such as heap leach pad modification applications submitted to the Regional Water Quality Control Board, associated with the Mesquite Mine provide detailed descriptions of all aspects of the operation and are public record. Additionally, as a signatory company to the ICMC, WMMI was initially certified under the Code in October 2011, recertified in February 2015, May 2018 and again in June 2021. The summary reports for these audits are available to the public via the ICMC website. The Equinox Gold website advertises that the company is signatory to the Code and that the Mesquite Mine is certified.

WMMI's 43-101 reports also contain a description of the process system and cyanide management, this is available through internet searches. These are provided to agencies as needed and available on Equinox Gold's website (https://www.equinoxgold.com/operations/technical-reports/), but they are not distributed to community stakeholders unless requested.

According to the National Center for Educational Statistics, as of 2003 (the most recent data available), approximately 41 percent of Imperial County residents lacked basic prose literacy skills (this includes "those who could not be tested due to language barriers").

Therefore, WMMI generally disseminates information in a verbal form via open meetings, training events, presentations, tours and civic events, because technical written documentation is unlikely to be understood by a large portion of the local population.

WMMI identifies in their Community Outreach Plan the specific demographics that may pose a challenge to communicating about cyanide use at the mine site to the local populations. Specifically, "About 83 percent of the Imperial County's population is Hispanic. As a result of their local employee pool, a large percentage of employees at the Mesquite Mine speak both English and Spanish fluently. This characteristic of their employee base also aids to the overall efficacy of their verbal communications regarding the mine's use of cyanide with the local population.

One cyanide release over this period occurred on site and did not result in significant adverse effects to health or the environment. Additionally, no cyanide exposure incidents occurred over this period. The release described above impacted surface soils only.

According to the Environmental Manager, WMMI reports all spills outside of containment to regulatory agencies, regardless of quantity. Regulatory spill limits are defined in the Waste Discharge Requirement and the Code of Federal Regulations. Any spill or release of a hazardous material that exceeds the reportable quantity limits requires immediate (verbal) notification of regulatory agencies, including the California Governor's Office of Emergency Services, Imperial County Public Health Department, Certified Unified Program Agency, RWQCB and BLM. Additionally, WMMI must submit a written summary to RWQCB within seven days of the verbal notice. It is the responsibility of WMMI Environmental Department to prepare, sign, and submit the required reports to the agencies.

During this audit cycle WMMI did not experience cyanide exposure, however if they had federal regulations; Mine Safety and Health Administration, require WMMI to submit reports of hospitalizations and/or fatality to the regulatory agency. These reports are publicly available.

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Written reports submitted to regulatory agencies become public information. Contact information for the agencies and other sources referenced above, where the public can access information regarding cyanide releases or exposure incidents that may occur at the Mesquite Mine, is provided below for easy reference:

California Regional Water Quality Control Board, Colorado River Basin Region (RWQCB)

73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260
Phone: (760) 346-7491
Website: www.waterboards.ca.gov/coloradoriver

Imperial County Public Health Department

935 Broadway Avenue
El Centro, CA 92243
Phone: (442) 265-1444
Website: www.icphd.com

California Certified Unified Program Agency (CUPA)

1001 "I" Street, P.O. Box 2815
Sacramento, CA 95812
Phone: (916) 327-9559
Website: www.calepa.ca.gov/cupa

Bureau of Land Management, El Centro Field Office (BLM)

1661 S. 4th Street
El Centro CA 92243
Phone: (760) 337-4400
Website: www.blm.gov/ca

California Governor's Office of Emergency Services

3650 Schriever Avenue
Mather, CA 95655
Phone: (916) 845-8510
Website: www.caloes.ca.gov

National Response Center 2100 2nd Street, SW

Washington, DC 20593-0001
Phone: (202) 267-2675 or toll free (800) 424-8802
Website: www.nrc.uscg.mil