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and:

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Eleonore Operations

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Rouyn-Noranda, Quebec, Canada

ICMC RECERTIFICATION SUMMARY AUDIT REPORT

Newmont Canada Ltd.

Eleonore Gold Mining Operations
Quebec, Canada

July 27, 2021

Project No.: 0582360

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July 27, 2021

ICMC Recertification Summary Audit Report

Newmont Eleonore Operations

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1. INTRODUCTION

The "International Cyanide Management Code For The Manufacture, Transport, And Use Of Cyanide In The Production Of Gold" (the Code) was developed by a multi-stakeholder Steering Committee under the guidance of the United Nations Environmental Program (UNEP) and the then, International Council on Metals and the Environment.

The Code is a voluntary industry program for gold and silver mining companies, and companies involved with the production and transport of cyanide to gold and silver mining companies; it focuses exclusively on the safe management of cyanide. Companies that adopt the Code must have their operations, which manufacture cyanide, transport cyanide or use cyanide to recover gold and silver, audited by an independent third party to determine the status of the Code's implementation. Those operations that meet the Code's requirements can be certified and be able to use a unique trademark symbol, which identifies the company as a certified operation. Audit results are made public to inform stakeholders of the status of cyanide management practices at the certified operation.

The objective of the Code is to improve the management of cyanide used in gold and silver mining and assist in the protection of human health and the reduction of environmental impacts (refer to www.cyanidecode.org). The Code is managed by the International Cyanide Management Institute (ICMI).

This summary report has been prepared to meet the requirements and intentions of the International Cyanide Management Institute (ICMI) to demonstrate that following named project has met the obligations in implementing and maintaining the International Cyanide Management Code (ICMC or Code) during the past three-year recertification period.

Name of Project:	Eleonore Gold Mining Operations
Project Owner / Operator:	Newmont Canada Ltd.
Name of Responsible Manager:	Marc Lauzier, General Manager
Address and Contact Information:	Newmont Canada Ltd. Eleonore Gold Mining Operations 1751, Davy Street Rouyn-Noranda, Quebec, Canada
Audit Company:	ERM Consultants Canada Ltd.
Audit Team:	
Lead Auditor:	Jean-Marc Leger, M.E.S., CEA® Email: Jean-Marc.Leger@erm.com
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Date of Audit:	This audit was conducted April 27 - 30, 2021
Nature of Certification:	Recertification – 1st Cycle

2. ATTESTATION

	☒	**in full compliance with**	
The Eleonore Operation is	☐	in substantial compliance with	**International Cyanide Management Code**
	☐	not in compliance with	

This operation has not experienced compliance problems or significant cyanide related incidents during previous three-year audit cycle.

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 Summary 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 Code Mining Operations Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

Jean-Marc Leger		July 27, 2021
Name of Lead Auditor	Signature of Lead Auditor	Date

Name and Signature of Other Auditors:

NA		
Name of Auditor	Signature Auditor	Date

3. BACKGROUND ON OPERATIONS

The Newmont Eleonore Mining Operations (N-E) is a wholly owned subsidiary of Newmont Inc. It is located in the Northern Quebec administrative region, within the territory of the Eeyou Istchee James Bay regional Government. More precisely, the Eleonore mine site is found northeast of the Opinaca reservoir and about 190 km east of the Cree community of Wemindji. N-E is a fly-in / fly-out operation and is located approximately 350 kilometers (km) north of Matagami, Quebec and approximately 600 km from Montreal (Figure 1). A 60 km long permanent access road is built between N-E mine and the *La Sarcelle* hydroelectric power station. This power generation station is located on the James Bay road linking the southern regions of the province to the *La Grande* hydroelectric complex to the north. There are approximately 656 people employed at N-E.

The surface operations at Eleonore mine consists of the following stages: a crushing circuit; grinding circuit, gravity concentrator and intensive cyanidation; flotation; leaching; carbon elution; electro winning and refining. Additional mill operations include cyanide destruction, tailings dewatering, paste backfill plant; carbon regeneration; reagent mixing plant and dedicated reagent storage building. Figure 2 provides a view of the location of ancillary facilities, including the tailings storage facility (1); the domestic wastes landfill (2), the air field (3); the camp (8); the security guard house (9) and the explosives building (10). The first gold from Eleonore mine was poured in October 2014 and commercial production began in April 2015. In 2019, N-E mine averaged 5,760 tonnes/day of processed ore.

Eleonore receives solid cyanide in isotainers or ISO road tankers. Each container has a capacity of 16.3 tonnes (16,300 kgs), from which a ‘dilution sparging’ system is employed that prepares a solution, 25% by weight of cyanide. This system is able to dissolve cyanide from the ISO container. The dissolved cyanide solution is first transferred in a mixing tank (90 m3) and then a distribution tank (118 m3) before being fed directly to the required points at this concentration from a pressurized distribution header. The dosage of cyanide into the cyanidation tanks is controlled with cyanide analyzers (TAC-1000) to ensure only the required amount is used. The isocontainers, empty and full, are stored in a separate compartment of a chemical storage building. The cyanide compartment of the chemical storage building can hold up to five isocontainers at a time.

The mineral deposit at Eleonore mine is characterized by gold observed either as attached to sulfides, locked to sulfides or otherwise free and available to intensive cyanidation. To maximize recovery, process flow at the plant includes three-stage crushing, single stage ball mill grinding, gravity concentration, sulfides flotation, cyanide leaching and gold production in a carbon-in-pulp (CIP) circuit. The following is a short description of the important stages of the mill process. The gravity circuit includes two Knelson concentrators. The recovered free gold is placed in an Acadia reactor. The remaining gold is recovered by conventional CIP means. The mill houses ten (10) stirred-tank reactors in which the slurry is leached, two (2) pre-aeration tanks for flotation concentrate as well as ten (10) CIP tanks for sulphide concentrate and non-sulphide flotation tails. Loaded carbon passes through an elution column using a caustic-cyanide solution to strip the gold. The tailings from this process is washed with incoming mill reclaim water. Residual cyanide is treated by an INCO SO2 cyanide destruct system. Tailings are fed to the thickners before being pressure-filtered. The sulphide concentrate filter cakes are directed to the paste backfill plant and the non-sulphide flotation tails filter cakes are either trucked to the tailings storage facility or supplied to the paste backfill plant if needed. The tailings storage facility is located 4 km northwest of the mill. The mill layout is shown in Figure 3.

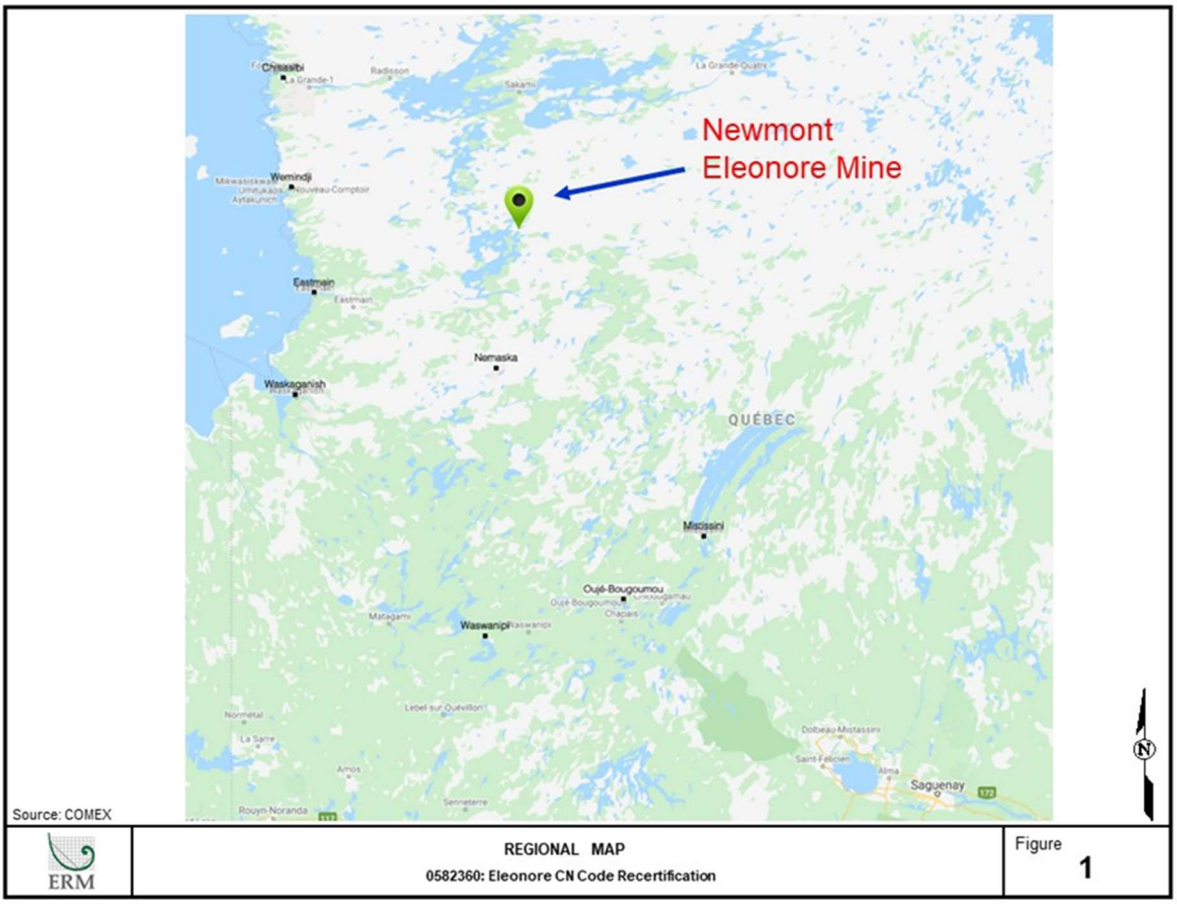


Figure 1. Regional Map

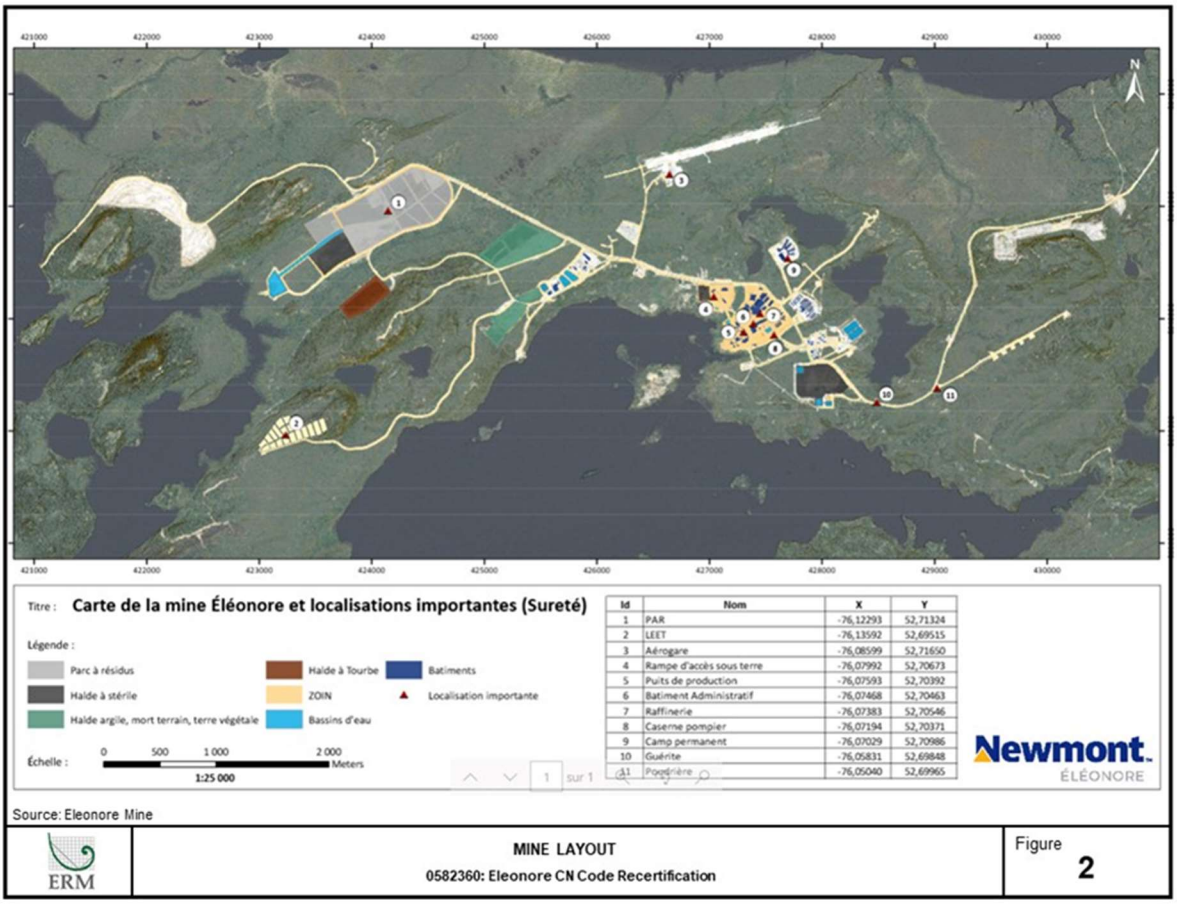
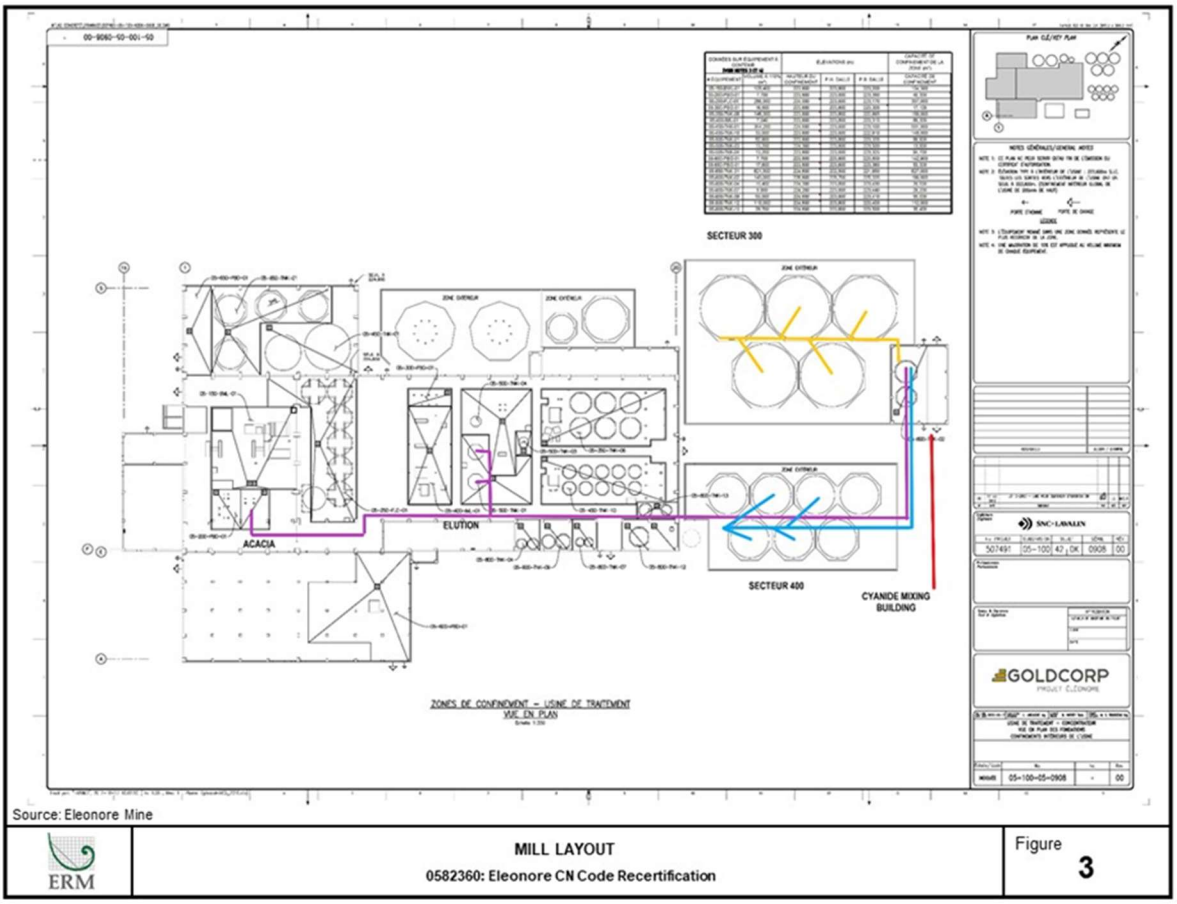


Figure 2. Mine Schematic



Source: Eleonore Mine

Figure 3. Mill Layout with cyanide solution lines

4. GOLD MINING VERIFICATION PROTOCOL

4.1 Principle 1 – Production

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.

FINDING:	BASIS FOR FINDING:
The operation in **full compliance** with Standard of Practice 1.1	N-E (Newmont Eleonore) is in full compliance with Standard of Practice 1.1, requiring the operation 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. N-E purchased its sodium cyanide from The Chemours Company and Cyanco Canada Inc. under distinct contractual Agreements. *Chemours*, the cyanide producer, was first certified as compliant under the Code in 2006, and was most recently recertified on January 21, 2020. *Cyanco* Houston plant was first certified in 2013 and was re-certified in 2017 and 2020. N-E's supply of cyanide has been from ICMI certified *Chemour* plant in Memphis and *Cyanco* Houston plant for the period of the recertification audit; no other suppliers were used.

4.2 Principle 2 – Transportation

Protect Communities and the Environment during Cyanide Transport

Standard of Practice 2.1: Establish clear lines of responsibility for safety, security, release prevention, training and emergency response in written agreements with producers, distributors and transporters.

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 2.1	N-E is in full compliance with Standard of Practice 2.1, requiring that the operation establish clear lines of responsibility for safety, security, release prevention, training and emergency response in written agreements with producers, distributors and transporters. Newmont Canada Eleonore Mine (and therefore, N-E) has a written cyanide supply agreement with *Cyanco* and had such a document with *Chemours*, which clearly states the responsibilities for safety, security, release prevention, training and emergency response with producers, distributors and transporters. These contracts extends or extended the responsibilities to any subcontractors and carriers that may be or have been used by the suppliers during the period covered by the recertification. *Chemours* subcontracted to *Groupe Robert* and *Octium Solutions* interim storage for the delivery of cyanide to N-E. *Groupe Robert* and *Octium Solutions* are part of *Chemours* Canada Supply chain, which was last certified on 18 August 2017. *Cyanco*'s North America Rail & Truck supply chain was last certified on 10 October 2018. *Transport Nord Ouest* (TNO) transporter is part of the certified supply chain. *Cyanco's* Cadillac, Quebec terminal was certified on 7 April 2017 *Chemours* confirmed it adds a red dye colorant to the cyanide products purchased by Goldcorp and shipping documents confirm only this product was shipped during the recertification period. The *Cyanco* – N-E contract has several references about raw material being compliant to the code and its 2019 SDS (Safety data Sheet) for solid form cyanide states dye is added to the reagent.

Standard of Practice 2.2: Require that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management.

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 2.2.	N-E is in full compliance with Standard of Practice 2.2, requiring that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management. Transportation of cyanide to the site was the responsibility of *Chemours* from March 2018 until June 30, 2020 under the cyanide supply contract. *Cyanco* took over the supplier's role on 1st July 2020. This contract requires that the cyanide be transported by carriers certified and compliant to the Code.

Standard of Practice 2.2: Require that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management.	
	The companies used to transport cyanide to the site during this recertification audit period were *Groupe Robert* and its subsidiary *DCRQ* during *Chemours* tenure and *Transport Nord Ouest* when *Cyanco* became the supplier of N-E. Cyanide transport carriers were part of the US/Canada Rail & Barge Supply Chain or North America Rail & Truck Supply Chain for both *Chemours* and *Cyanco*. The supply chains were both under certification during the recertification period of N-E. N-E maintains copies of the bills of lading and delivery dockets that show the full chain of custody from *Chemours*' Memphis or *Cyanco* Houston plants to the mine. All bills of lading from March 2018 to June 2020 show *DCRQ* / *Groupe Robert* as the carrier between interim storage and N-E. From July 2020 until March 2021, bills of lading show *Transport Nord Ouest* as carrier between *Cyanco* Cadillac terminal and N-E.

4.3 Principle 3 – Handling and Storage

Protect Workers and the Environment during 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.

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 3.1.	The operation is in full compliance with 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. According to the 2018 Golder certification report, N-E has mandated the engineering consultancy *SNC-Lavalin* to design and supervise the construction of the ore processing plant (or mill) including the cyanide mixing building (#800) and the chemical storage building. The facility design drawings and design criteria documents were signed by engineers between 2012 and 2013 and prior to construction of the mine. In December 2012, *SNC-Lavalin* prepared an engineering report designed to align the construction project with ICMI's requirements. The design and construction of the chemical storage and mixing buildings for the use of solid cyanide followed sound engineering practices. There have been no significant change to these facilities since the previous certification audit in 2018 and the findings are still valid. The cyanide mixing building is adjacent to the mill, constructed in 2014. The chemical storage building is separated from the mill and its adjacent mixing building. The original supplier of NaCN, Chemours, provided recommendations to N-E regarding the design of the cyanide mixing building. The ERM auditor observed the facilities to be in good condition. ERM auditor did not review facility design drawings and design criteria documents for the recertification audit. N-E has located the chemical storage and mixing buildings away from people and surface water. The chemical storage and mixing buildings are located approximately 350 m from Opinaca Reservoir. Both buildings are located inside a surface drainage network or ditches and basins. The surface water drainage and retention infrastructure is connected to the industrial water treatment plant located about 1.5 kilometer northwest of the mill complex. Any significant spill of cyanide solution not confined in the secondary containment would be captured by the surface drainage network prior to reaching a water body and treated before release to the natural receptor. With respect to potential for exposure to the general public, the chemical storage and mixing buildings have a secured access system preventing unauthorized entry by public. The mixing building is ventilated and equipped with HCN monitors. The mixing building is also equipped with full body showers, oxygen cylinder and video cameras linked to the mill's control room and DCS system (Display Control System). Entry requires full PPE and respiratory protection in the mixing building but not in the cyanide section of the chemical storage building. The Eleonore mine site is isolated from the nearest community, Wemindji, which is almost 200 km away.

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.	
	N-E has installed level sensors in the cyanide mixing tank and storage tank to prevent overfilling. The sensors are serviced regularly. A high level alarm will automatically shut off the water and caustic valves as well as the compressed air system and transfer and circulation pumps. The alarm signals will show on the DCS system in the control room, the mixing DCS screen and the *Sonim* portable communication device. The cyanide mixing and storage tanks are located inside the mixing building (#800). Both tanks are found inside concrete secondary containment to prevent seepage to the subsurface. This containment has not changed since the 2018 certification audit. The auditors observed that the containment was in good condition and free of debris. N-E receives solid cyanide in isocontainers. The isocontainers are stored in a dedicated section of the chemical storage building. The spill containment in the cyanide storage section is separate from the other sections spill containment structures. The cyanide section of the chemical storage building as well as the mixing building have mechanical ventilation to prevent the build-up of hydrogen cyanide gas and are equipped with fixed HCN monitors. The ventilation systems are adequate to prevent the build-up of hydrogen cyanide gas. Incompatible materials are not kept in the cyanide storage or mixing building. Access to the cyanide isocontainer storage section is secured with access code system. The chemicals observed in other physically isolated sections of the chemical storage building include lead nitrate, citric and nitric acids, copper sulfate, xanthate, antiscalant and carbon. No foods, animal feeds, or tobacco products are stored in the chemical storage building.

Standard of Practice 3.2: Operate unloading storage and mixing facilities using inspections, preventative maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.		
ITEM	EVIDENCE OBSERVED	OBSERVATIONS
FINDING: The operation is in **full compliance** with Standard of Practice 3.2.	**BASIS FOR FINDING:** The operation is in full compliance with Standard of Practice 3.2; operate unloading storage and mixing facilities using inspections, preventative maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures. N-E received solid cyanide in isocontainers. The isocontainers are marked with UN 1689 placards upon arrival. Once empty and rinsed three times, the UN 3414 placard is placed on the isocontainer as some left over rinse liquid is present. Reagent operators are required to inspect the isocontainer for cyanide spillage after a mixing batch is completed. The isocontainer is then stored empty in the cyanide section of the chemical storage building before being shipped back by the transporter to the vendor company for further use. N-E has developed and implemented procedures to prevent exposures and releases during cyanide storage and mixing. These include an isocontainer	

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

ITEM	EVIDENCE OBSERVED	OBSERVATIONS
	transfer procedure from the chemical storage to the mixing building and a mixing procedure to guide the reagent operators in connecting and securing flexible pipes to the isocontainer connectors. The isocontainer transfer itinerary does not involve driving on the main access road but a secondary access lane. Transportation on the short distance involves communicating with mine surface dispatch to request permission for transport. The mixing procedure specifies the need to rinse the floor of the mixing building as well as the isocontainer after noticing a leak or spill. The mixing procedure details the operation of valves, agitators, pumps, exhaust fans, during mixing and transfer to the storage tank. The cyanide mixing procedure also describes the PPE requirements, which includes the full-face respirator equipped with P-100 cartridges, chemical resistant clothing, rubber boots, and gloves, a portable HCN monitor, radio and Sonim. A team of two reagent operators are required for the preparation of a batch. The reagent operator has to inform the nurse at the mine clinic as well as test the emergency shower prior to beginning a cyanide solution batch. In addition, the reagent operators are in communication with the control room operator who can observe the mixing operations from a close circuit video camera system. High concentration cyanide solution was verified to be red colored in accordance with information provided by the supplier, who adds solid dye in the isocontainer at the production facility. To verify compliance, the auditors observed the arrival, the transfer, unloading and mixing activities during the preparation of a cyanide solution batch. A sample of mixing checklists were reviewed from throughout the recertification period.	

4.4 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 preventative maintenance procedures.

ITEM	EVIDENCE OBSERVED	OBSERVATIONS
FINDING: The operation is in **full compliance** with Standard of Practice 4.1**.**	**BASIS FOR FINDING:** The operation is in full compliance with 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. N-E has written operational plans and procedures to manage cyanide related facilities including isocontainer storage, unloading and mixing (800 sector) as well as mill circuits including leaching (300 and 400 sectors), Carbon in Pulp (350 and 450 sectors), elution (500 sector), Acacia plant (200 sector) and cyanide destruction (650 sector). Procedures are also developed and implemented for other mill activities such as acid wash, carbon stripping and regeneration, backfill paste plant or facilities like the industrial water treatment plant, the tailings storage facility and storm water retention basins and drainage ditch network. *SNC-Lavalin* consultancy established the criteria to operate the mill. The operating parameters are documented in the “Consignes d’opération Global” document. The operational criteria are defined for all sectors of the mill. For the various parameters at the different mill sectors, minimum, target and maximum values are indicated. For example, for sector 150, grinding target tonnage processed per hour is set at 260. In the case of the leach tank #2, #3 and #5, free cyanide concentration in ppm is targeted at 110, 110 and 90 respectively. The target pH is 10.5 and minimum value is set at 10.3. WAD (Weak Acid Dissociable) cyanide concentration after detox is set at 1 ppm. WAD cyanide at the destruction reactor effluent is measured once per shift (12 hours). The regulatory mine effluent discharge limits for total cyanide is 1 mg/L instant value and 2 mg/L for the monthly mean value (Quebec Directive 019). Water currently percolating through the TSF (Tailings Storage Facility) is captured and directed to the TSF pond before being pumped for treatment at the IWTP. Free board of 1 meter is maintained for the pond. An emergency spillway is present at the TSF pond. WAD cyanide in the TSF collection basin averaged 0,007 mg/L over the recertification period (compared to the Code limit of 50 mg/L). It should be noted that the industrial water treatment plant (IWTP) basins as well as the TSF collection basin are not considered cyanide facilities since monitoring data reviewed has shown cyanide concentration consistently below the 0.5mg/L threshold value. However, these structures have been included for completeness in this report. N-E moved from the Goldcorp management system to the Newmont’s framework adopting the use of risk assessments and implementing critical control verifications (CCVs) to align with the new corporate standard N-E has designs, plans, manuals, and procedures that identify the assumptions and design criteria to prevent or control cyanide releases and exposures. The regulatory mine effluent discharge limits for total cyanide is 1 mg/L instant value and 2 mg/L for the monthly mean value (Quebec Directive 019). The mine effluent is discharged in the Opinaca Reservoir. Total cyanide is monitored	

Standard of Practice 4.1: Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventative maintenance procedures.		
ITEM	EVIDENCE OBSERVED	OBSERVATIONS
	weekly while WAD cyanide and free cyanide is monitored four times a year according to various federal, provincial requirements or permit obligations. Cyanide sampling in Opinaca Reservoir is performed at the surface and different points in the water column. N-E has developed a series of written procedures, and programs that describe the practices necessary for the safe and environmentally sound operation of the cyanide facilities, including the specific measures needed for compliance with the Code and regulatory requirements. The procedures discuss the risks involved with each task (including unloading, storage, operations, entry into confined spaces, and equipment decontamination) and describe safe work practices. Each procedure details task specific procedures and personal protective equipment (PPE) requirements. N-E implemented a management of change process that accommodates both major capital projects and minor modification initiatives to optimize operating conditions. The management of change is represented by a four stage approach involving operators, supervisors, foreman, planners, sector general foreman, project managers, owning department directors as well as Health and Safety and Environmental managers when appropriate. The management of change process is illustrated by the Work Order Modification Process flow diagram referenced document. The change of cyanide supplier in the Spring of 2020 which involved the addition of a water line in the 800 building is documented. N-E has developed contingency procedures and plans for cyanide-related process deviation, planned or unplanned shut downs, closure or temporary cessation of activities. These are partly represented by the listed control plans established for the mill related equipment, which may or may not contain cyanide solution. The TSF operations manual also provides contingency measures although the infrastructure receives dry mining residues with 1 ppm of cyanide. There were no significant changes to these plans since 2018. N-E inspects the cyanide facilities on established frequencies to ensure the milling operations are conducted within designed parameters. The inspection process is documented and results are recorded. Deviations are reported and corrective measures taken when gaps are observed. The inspection process is conducted through SAP generated work orders. The inspected equipment include, tanks, piping, valves, pumps, cyanide-associated instrumentation and monitoring devices as well as ancillary equipment such as ventilation systems, emergency showers and fire extinguishers The frequency of the verifications vary from shift-based to weekly, monthly, quarterly, bi-annual and annual. The inspection frequency is established according to manufacturer's recommendations or from best practice observed at the site if found to be more adapted to existing conditions. ERM observed signs of urethane sealant deterioration in secondary containments inside and outside the mill, notably at the Leaching circuit (sector 400) and mixing building (sector 800). In June 2021, N-E had a *WSP consultancy* qualified engineer proceed with an inspection of outdoor secondary containment structures and a review of technical drawings (As Built Plans). The results of the inspection confirmed that the secondary containment structures are "*in good condition, leak proof and capable of retaining spilled liquids*". Minor repairs should be conducted, namely the replacement of existing but damaged surface sealant with *Sikadur* and *Sikaguard* products or their equivalent.	

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

ITEM	EVIDENCE OBSERVED	OBSERVATIONS
	N-E documents their inspections on forms generated with the SAP work order. The name of the inspector(s), date of the inspection, and time of the inspection are noted. The forms allow for the addition of comments about unusual condition or deficiencies. These deviations are communicated to supervisors and maintenance planners. The corrective measures are then planned through SAP. A review of SAP extracted data (EasySAP) indicates that when an issue is identified it is tracked in SAP for corrective action. N-E has implemented a maintenance program to ensure that equipment and instruments function optimally and to reduce down time. The maintenance program at N-E is supported by SAP system. The IT system generates work orders associated with maintenance activities. Maintenance planners are responsible for allocating priority levels to work orders. Finally, N-E maintains a list a spare parts available in the warehouse, and given that it is difficult to ship items in winter. Every year the critical spares are reviewed between the warehouse and the maintenance department to determine if the list is still valid. The spare parts list is developed based on the recommendations of the Original Equipment Manufacturer (OEM). N-E's primary power supply is provided by Hydro Quebec public utility. In case of failure of the grid, N-E is equipped with twelve power generators in the industrial area including six (6) for the mill and paste backfilling buildings alone. The emergency back-up power supply represents a 7.5 Megawatt (MW) capacity. The emergency power supply is designed to maintain critical equipment operating and prevent accidental cyanide release or exposure. The allocation of emergency power is driven by a "control philosophy" document prepared by *SNC-Lavalin* consultancy, which establishes delivery priorities to critical equipment as well as maximum load usage per generator. The diesel generators are associated with a UPS (Uninterruptible Power Supply) system enabling a transition from the grid to the emergency power supply.	

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

FINDING:	**BASIS FOR FINDING:**
The operation is in **full compliance** with Standard of Practice 4.2.	The operation is in full compliance with Standard of Practice 4.2; introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings. N-E has maintained efforts to optimize cyanide usage at the mill. N-E conducts quarterly metallurgical tests to update the set of *Operation Guidelines* (i.e. *Consignes d'Opération*) for each sector of the mill. Cyanide addition rates in the *Consignes d'Opération* is first presented for the Gravity Concentrator and Intensive Cyanidation circuit (sector 200), where a volume of 400 liters of cyanide

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

	is targeted. Cyanide addition targets are also established for the Leaching circuits (300 and 400 sectors). For example, in sector 300, free cyanide concentration of 110 ppm, 100 ppm and 90 ppm is aimed for leach tank # 2, # 3 and # 5 respectively. In 2018, these concentrations were significantly higher according to the certification audit report (i.e. 205, 195 and 185 ppm). TAC-1000 analyzers in leach tanks provide continuous free cyanide concentration readings for monitoring the process in the DCS IT system. Manual titration is also performed once per work shift at the leaching stage. The manual titration serves as a validation of the automated cyanide readings (TAC-1000). A review of the extracted data for manual titration was performed by the auditor. The data aligned with the operating parameters.

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

FINDING:	**BASIS FOR FINDING:**
The operation is in **full compliance** with Standard of Practice 4.3**.**	The operation is in full compliance with Standard of Practice 4.3; implement a comprehensive water management program to protect against unintentional releases. The Hatch 2016 GoldSim-based mine water balance was updated in 2021 by Golder Associates. The update is the result of a checklist and gap assessment evaluation against current Newmont standards. In addition, Golder's review effort was designed to meet ICMC requirements. The existing GoldSim model allows for water balance calculations based on flow measurements from an automated logging system, namely PI datalink database, and daily reports entered using a data input spreadsheet. The main components of the water balance included in the model are climate module; industrial water treatment plant; industrial zone; mill; underground mine; potable and domestic water; tailings storage facility and waste rock stockpile. In addition to providing water balance calculations from measured data, the model can be used to simulate future water balance. For the recertification period, N-E continued to use and update the GoldSim water balance. The GoldSim model is both comprehensive and probabilistic. It is appropriate for the facilities and processes as it refers to a legally required standard regarding a design storm duration and storm return interval from Directive 019; meteorological data from the onsite weather station and a second station located 150 km from the mine; the model integrates the SNOW-17 model to account for snowmelt; the pumping equipment for the surface water retention basins in the industrial zone, the TSF surface water retention pond and the IWTP are connected to the emergency power system so that they will continue to operate if a power failure occurs N-E has prepared an Operation, Maintenance, and Surveillance (OMS) Manual with procedures for inspection and monitoring of the TSF. Operators perform daily inspections to surface water drainage pond of the TSF but also the surface drainage retention ponds of the industrial area, IWTP ponds to confirm operating levels are within design parameters. Additional weekly inspections are conducted

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

	and documented by foreman and, on an annual basis, with the designer, as part of the statutory inspection process. The weekly and annual inspections validate integrity of drainage and monitoring system. The various basins or ponds at N-E were designed by *SNC-Lavalin* consultancy and built according to sound engineering practice. During the field portion of the verification in late April 2021, all basins and pond were operating with 1-meter freeboard, which is the legal requirement in Quebec taken from Directive 019. Finally, N-E measures precipitation on site. During the 2020-21 water balance review process, change to "operating rules" for ponds were implemented to improve on the robustness of the of water management related practices.

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

FINDING:	**BASIS FOR FINDING:**
The operation is in **full compliance** with Standard of Practice 4.4.	The operation is in full compliance with Standard of Practice 4.4; implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions. N-E operates different ponds at the site. One surface water collection pond at the TSF (46 000m3), three ponds at the IWTP (sedimentation and polishing both 17 000m3 and a treated water pond 8 000m3). Similarly, surface water drainage retention ponds are present in the industrial zone (BS01: 4 615m3; BS02: 335m3; BS03: 2 300m3; BS04: 2 300m3). Additional ponds are present at the mine although not in contact with cyanide include domestic wastewater treatment pond and waste rock pile ponds for surface water retention purpose (BR1; BR2; BEC). Site visit, document review and interviews suggest that mill process water is recycled as much as possible, the cyanide destruction circuit at the mill is designed to limit cyanide content in tailings 1 ppm and tailings are filtered to a humidity content of 18%. Mine or other industrial wastewaters from the TSF, mill surface water drainage retention ponds and waste rock storage area as well as underground mine waters are treated at the IWTP. Data review over the recertification period suggest none of the industrial wastewaters in accumulation at the TSF or in the industrial zone meet or exceed the 50 mg/L CN_{WAD} threshold concentration. As such, the requirement of fencing and netting does not apply to N-E. Nonetheless, N-E proceeded with fencing of the TSF, IWTP and industrial zone ponds to prevent damage to infrastructure from large size ungulates and other wildlife caught sliding in the membrane-lined ponds. N-E demonstrated by weekly sampling that WAD cyanide has not exceeded 50 mg/L throughout the recertification period in the TSF pond. The maximum concentrations of WAD cyanide in the TSF pond was 0.011 mg/L on 05-19-2020; 0.021 mg/L on 05-20-2019 and 0.36 mg/L on 05-27-2018.

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

	The environmental monitoring plan includes a fisheries mortality indicator (i.e. sturgeon). No incidence of cyanide-related mortality was observed in the annual reports reviewed and interview. As reported, there is no cyanide contaminated open water bodies for wildlife to be impacted. The existing ponds are fenced. The issue of overspray is inapplicable because N-E does not have a heap leach facility.

Standard of Practice 4.5: Introduce management and operating systems to minimise cyanide use, thereby limiting concentrations of cyanide in mill tailings

FINDING:	**BASIS FOR FINDING:**
The operation is in **full compliance** with Standard of Practice 4.5.	The operation is in full compliance with Standard of Practice 4.5; implement a comprehensive water management program to protect against unintentional releases. N-E discharges treated industrial waters in the Opinaca Reservoir. The discharge point where monitoring occurs before dilution in the Opinaca Reservoir is known as “Regard 6”. Weekly sampling data of the IWTP discharged waters show concentrations below the 0.5 mg/L CN_{WAD}. The maximum concentration observed during the recertification period was on 14 January 2019 where 0.153 mg\L was detected. Otherwise, CN_{WAD} concentrations have been systematically recorded below the 0.05 mg/L or 10% of the threshold discharge limit. N-E’s treated mine effluent is discharged in the Opinaca Reservoir through an outfall pipe reaching the bottom of the Reservoir approximately 150 meters from the shore. A mixing zone was delineated around the end of the outfall pipe, which includes a nearby trench. The mixing zone was determined by the local regulatory agency responsible for issuing N-E its environmental permit in 2014. Sampling in the mixing zone is conducted four (4) times in the summer season in agreement with permit obligations (June, July, August and September). The mixing zone including the trench area is sampled four times a year (June through September months). Sampling points are known as ES-EFMP01-S; ES-EFMP02-S & ES-EFMP03-S for sampling points at different depth near the discharge point and ES-EFMP01-F; ES-EFMP02-F; ES-EFMP03-F for trench sampling point at different distances from the discharge point. Nearly all results during the recertification period were observed to be below the detection limit of the analytical method of either 0.005 or 0.001 mg/L for free cyanide. N-E does not have any indirect discharges to nearest surface water bodies. Water from underneath the geomembrane-lined TSF surface water drainage pond is captured and pumped 3.6 km to the IWTP before discharge to the natural receptor. The pumping occurs in the warmer season. This requirement was imposed by the regulator following a visit to the site as part of planned Phase II TSF expansion project

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

ITEM	EVIDENCE OBSERVED	OBSERVATIONS
FINDING: The operation is in **full compliance** with Standard of Practice 4.6.	**BASIS FOR FINDING:** The operation is in full compliance with Standard of Practice 4.6; implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater. N-E operations protect the groundwater through different strategies. These are represented by the destruction of cyanide in tailings to 1 ppm, the filtration of tailings to limit humidity to 18% and the use of HDPE geomembrane-liners in the TSF and various surface water collection ponds. Notwithstanding the above, N-E installed and monitors groundwater from a series of 28 piezometers or monitoring wells. The number of groundwater monitoring wells is based on the environmental permit issued by the provincial regulator in 2014 and reviewed in 2017. The monitoring wells are located in the industrial zone (4), the waste rock storage (5), the TSF (8), the IWTP (3), the petroleum product tank farm (3) and the landfill (5) areas. These measures remain largely unchanged from those described in the 2018 certification audit report. The Quebec Directive 019 for mining projects is applied for groundwater monitoring purposes at N-E. The cyanide species to be used for groundwater monitoring is CN_{TOT} and frequency of monitoring is twice per year (Spring and Summer). There is no threshold concentration to establish compliance. Rather, contaminants must be monitored closely to detect a contamination trend over the years, which, if observed, will be treated by a corrective action plan. N-E extracts groundwater for drinking purposes from potable water wells located up gradient from mine infrastructure according to interviews. There is no jurisdictional established compliance points below or down gradient from the mine and there is no jurisdictional established beneficial uses or current use of groundwater in the area of the facility. Underground backfilling with both sulfide and, when needed, non-sulfide mill tailings is conducted at N-E. The potential risks on workers was assessed and continues to be monitored in the paste backfill building for HCN gas and CN_{WAD} concentration in mine waters pumped and treated at the IWTP. The maximum CN_{TOT} concentration observed during the recertification period is 0.003 mg/L in June 2020 at the PO-PAR04-R sampling point (TSF) when the detection limit is 0.001 mg/L. The PO-UTEI-03 sampling point at the IWTP showed a maximum concentration of 0.096 mg/L in May 2019 but returned to near detection limit afterwards (i.e. 0.001 mg/L). Other IWTP groundwater well data were near detection limit for the recertification period. Concentrations of CN_{TOT} were below detection limit for the groundwater monitoring wells in the industrial zone section during the recertification period. Groundwater monitoring data over the recertification period suggest there has not been seepage from operation that would have caused cyanide concentrations to rise and trigger a correction action plan. In addition and as indicated above, there is no jurisdictional established compliance points or beneficial uses of groundwater in the area of the mine.	

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

FINDING:

The operation is in **full compliance** with Standard of Practice 4.7.

BASIS FOR FINDING:

The operation is in full compliance with Standard of Practice 4.7; Provide spill prevention or containment measures for process tanks and pipelines.

N-E has provided secondary containment for all cyanide mixing, storage, and process solution tanks at the mill. N-E has sized the secondary containments to hold at least 110% of the volume of the largest tank or vessel within its containment. N-E's concentrator control strategy does not authorize discharge from secondary containments to the environment. N-E has installed secondary containment to retain cyanide solution, which is recycled back in the process circuits.

N-E does not operate buried pipelines. All cyanide-containing solution or slurry piping is found within the mill (concentrator) or reagent (#800) buildings or, when exterior, over secondary containment such as in the leaching tank area (#300 & #400). Any leaking solution would be contained and flow to a sump and pumped back to the head of the circuit. There are two exceptions where aerial piping is present over unconfined areas. A first section is observed between the mixing building and the #400 area. This cyanide line is characterized by a pipe in pipe section. A second unconfined section is observed between the #300 and #400 leaching tanks areas under secondary containment and the CIP circuit inside the mill building. These two pulp lines are less than 10 meters long each. As mentioned earlier, dry tailings are trucked to the TSF.

On January 4th, 2021, approximately 150 liters of slurry with 100 ppm of cyanide leaked from the unconfined section of the aerial pipe between the leaching tank area (#300) and the CIP circuit inside the mill building (#350). The leaked slurry accumulated over snow and frozen soil. The leaked occurred precisely from the Victaulic clamp groove, considered the thinnest pipe section in the unconfined area. The mill was immediately shut down, the cyanide slurry, snow and some frozen top soil material was recovered and disposed in the mill process. The leaking pipe was repaired prior to mill return to operations. Provincial regulatory agency as well as local community were informed of the incident. ICMI was not kept informed of the event as N-E determined it did not meet the "Required Notification to ICMI / Significant Cyanide Incident" conditions identified in the Cyanide Code Signatory Application Form document. The event or release did not: 1) result in human exposure requiring response from ERT (Emergency Response Team); 2) did not enter a natural surface waters, on or off-site; 3) did not occur off-site or migrated off site; 4) did not mobilize the ERT; 5) is not a transport related incident; 6) did not result in multiple wildlife mortality; 7) is not related to cyanide theft. The auditor is in agreement with the decision of N-E on whether not to declare to ICMI. The RCA (Root Cause Analysis) identified eight (8) corrective measures being implemented in 2021. These include but not limited to the replacement of the repaired pipe with a rubber-lined steel pipe; review the inspection criteria and inspect the 400 leach pipe over unconfined area; install launders under the unconfined section of the cyanide line between the cyanide building #800 and #400, install drip trays under section of the slurry lines in unconfined areas and review and validate the cyanide line inspection program.

No special protection needs was deemed necessary to implement to mitigate the risk of cyanide release to surface waters. N-E has constructed process tanks and pipelines of carbon steel, stainless steel, and HDPE. These materials are compatible with cyanide and high pH conditions. The recertification period was characterized by a mill piping replacement project. The project started during the initial certification and Phase IV extended from February to November 2018,

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

	which is at the beginning of the recertification period. Stainless steel piping was installed in circuits #200, #300, #400, #500 and #800 during Phase IV. The auditor observed these materials during the site visit to verify compliance.

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.

FINDING:	**BASIS FOR FINDING:**
The operation is in full compliance with Standard of Practice 4.8.	The operation is in full compliance with 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. N-E has implemented QA/QC programs during the construction of the cyanide facilities. In addition, the recertification period was characterized by a mill piping replacement project. The project started during the initial certification period and Phase IV extended from February to November 2018, which is at the beginning of the recertification period. Stainless steel piping was installed in circuits #300 and #400 during Phase IV. The project included a thorough QC and QA program as well as a PSSR (Pre Startup Safety Review) process. N-E has retained QA/QC records for all active cyanide facilities in the form of “As Built Drawings” and QA testing results. N-E has used appropriately qualified personnel to review QA/QC records to ensure that the cyanide facilities were built as intended. Therefore, the findings of the 2018 certification audit below are still valid and are repeated below for completeness. Other than the mill piping replacement project of 2017 to 2018, there have been no change to these facilities since construction in 2014. Project records confirms N-E personnel provided oversight, accepted construction work and signed off on As Built Drawings.

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

FINDING:	
The operation is in **full compliance** with Standard of Practice 4.9**.**	The operation is in full compliance with Standard of Practice 4.9; implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and groundwater quality. N-E has developed written procedures for monitoring surface water, groundwater, and wildlife. The December 2018 sampling and analyses protocols are in alignment with regulatory agency guidance. The environmental department managing staff are trained in engineering, environmental science and geology and have several years of experience in the mining sector. Samples are analyzed

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

	by *H2Lab* laboratory, which is accredited by the province of Quebec environmental regulator. N-E has implemented a procedure and a series of work instructions that specify field and laboratory methods for sampling and analysis for potable, industrial, surface and groundwater monitoring. Sampling instructions for dust and toxicity on aquatic life is also documented. In addition, N-E has developed specific guidelines for filling out chain of custody forms and shipping samples. The final effluent is measured against CN_{TOT} and CN_{FREE} while potable water compliance criteria refers to the CN_{TOT} species while surface water compliance criteria refers to CN_{WAD} only. Groundwater compliance criteria is measured against CN_{TOT} species as per provincial regulation on potable water and provincial directive 019. The auditors reviewed field logbooks to verify that weather, wildlife activity, and other anthropogenic factors that might affect sample integrity were documented throughout the recertification period. The 32 groundwater monitoring wells and 15 surface water sampling locations represent up and down gradient data as agreed upon with regulatory agency and required by permit conditions. The recoded data file indicates frequency and date of sampling, laboratory conducting analyses and thereby attests water-related monitoring activities are implemented at N-E as per legal obligations. N-E monitors at frequencies that are adequate to characterize changes in groundwater and surface water quality in a timely manner. Mine treated effluent is monitored weekly, quarterly and annually for CN_{TOT}, CN_{WAD} and CN_{FREE}. The Opinaca Reservoir is monitored four time during the summer season for CN_{TOT} and CN_{FREE}. Selected streams are monitored quarterly for CN_{TOT} only. Surface drainage water from the TSF and collected in its retention pond is monitored weekly and annually for CN_{TOT} and CN_{FREE}. Surface water collected in the industrial zone retention basins are monitored weekly for CN_{TOT} and CN_{FREE}. Finally, groundwater is monitored twice a year for CN_{TOT}. N-E inspects for wildlife mortalities in accordance with a written procedure. Inspection checklists for TSF and Industrial Zone as well as specific biodiversity checklists include a wildlife mortality item. The wildlife management procedure also established the need to report any wildlife mortality to the environment department who may contact Mine Surface Supervisor for support. Depending on the species involved, reporting is to the regulatory agency as well as Wemindji community environmental committee representative.

4.5 Principle 5 – Decommissioning

Manage Cyanide Process Solutions and Waste Streams to Protect Human Health and the Environment

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 5.1.	The operation is in full compliance with Standard of Practice 5.1; plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock. N-E has planned for effective decommissioning of the cyanide facilities to protect humans, wildlife, and the environment. N-E has developed a mine-wide closure plan with a Schedule specifically for cyanide decommissioning. The cyanide decommissioning plan (Schedule J) describes the cyanide-related facilities, detailed account of equipment and activities. It including references to the disposal of residual cyanide by use in the destruct circuit, disposal of cyanide contaminated sediment and scale in the TSF after destruction. The cyanide decontamination procedure refers to triple rinsing followed by confirmation sampling. The tailings are detoxified and thickened prior to disposal in the TSF and the decommissioning plan stated that the cyanide concentrations are such that they will not have an adverse impact to people, wildlife, or the environment. Table 8.2 of the mine-wide closure plan presented a decommissioning calendar from end of exploitation to end of post closure monitoring. The Schedule J of the restoration plan provides specific cyanide decommissioning procedure, estimated cost and timeline. The site-wide restoration plan is updated every five years and the last review occurred in September 2020.

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 5.2.	The operation is in full compliance with Standard of Practice 5.2; establish an assurance mechanism capable of fully funding cyanide related decommissioning activities. N-E has developed a cost estimate for the decommissioning of cyanide-contaminated equipment and infrastructure. The cost estimate of $3.6M CAD is presented in Schedule J of the 2020 site-wide restoration plan. The 2020 site-wide restoration plan is an update of the 2016 plan. Schedule J and the 2020 site-wide restoration plan cost were accepted by the regulatory agency. Schedule J cost estimate was prepared in November 2016. At the request of the auditor, N-E updated cyanide decommissioning cost estimate in June 2021. The cost update was performed by *SNC-Lavalin* consultancy, the engineering firm responsible for the design of the Eleonore Mine Operations. The cost estimate

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

	prepared by *SNC-Lavalin* consultancy is based on third party conducting the decommissioning activities. N-E has established an irrevocable standby letter of credit for the benefit of the Quebec Ministry of Energy and Natural Resources as a financial mechanism for mine decommissioning and closure. The standby credit letter from the Bank of Nova Scotia dated 25 January 2021 is for a new amount of $48,732,693.50 CAD. The amount covers mine-wide closure, which is considerably greater than the cost for cyanide decommissioning alone.

4.6 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 eliminated, reduce and control them.

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 6.1**.**	The operation is in Full Compliance with Standard of Practice 6.1 requiring that the site identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them. N-E has over 475 written mill operational procedures of which 92 were provided to the auditor for review. The procedures provide step-by-step task description, often supported with photos and risk management advice as additional information. A key feature of these documents is a purple colored cyanide warning message to inform about the exposure risk in relation to the procedure. The maintenance work orders also present the cyanide exposure warning along with PPE and decontamination consideration. The N-E general and specific work permit process captures cyanide exposure risk from a task involving a confined space entry element. In this instance, the operator will follow the additional referenced procedure. All procedures involving a potential for a cyanide exposure contain a warning to this effect and a fully developed PPE and valid training requirement section. Facility-wide pre-work inspection is conducted on a shift basis and documented for review by supervisors. The representatives of the Health and Safety and the Environment departments are solicited to provide input and advice on a request for a modification captured in a management of change process. After approval by these individuals and proper documentation is established, the execution phase moves forward. N-E solicit operators and maintenance employees input through pre-shift safety huddles, work card, job hazard analysis and work permit processes implemented at the site.

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.

FINDING:

The operation is in **full compliance** with Standard of Practice 6.2.

BASIS FOR FINDING:

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

The operating parameters are documented in the "Consignes d'opération Global" document. Where applicable, the pH operational criteria are defined for the mill circuits. Automated equipment add caustic reagent in the process and measuring instruments provide data on pH value to prevent the release of HCN gas in the buildings. The pH data is captured in the DCS IT system accessible to control room as well as mill operators who can adjust the reagent or intervene during an equipment failure.

N-E installed *Dräger Polytron 8000* HCN fixed monitors at 28 locations in the mill and mixing buildings. Furthermore, fixed *Honeywell* HCN monitors are present in the Assay Laboratory. In addition to the fixed HCN detectors, N-E provides 34 portable multiple gas detectors with HCN capability to operators and maintenance crew. Fixed detectors are configured with operational alarms set at 4 ppm and evacuation alarms set at 10 ppm. A concentration of 4 ppm of HCN in a mill sector will trigger a local warning alarm, which is monitored by floor and control room operator. If the HCN concentration reaches 10 ppm in the sector, a formal mill-wide announcement is made informing sectoral issue. When two sectors of the mill witness a 10 ppm HCN condition, a mill evacuation is ordered through the speaker system. Operators are responsible for performing bump test prior to usage of portable HCN detectors. Otherwise, calibration is performed automatically on a monthly basis if the portable detector is lodged in the charging station. As for fixed HCN detectors, an instrumentation technician is responsible for ensuring they undergo calibration every month. Calibration is performed according to manufacturer's recommendations.

N-E has posted warning signage at the entrance of the isocontainer storage, mixing and mill buildings. The signage is also present at different locations inside the mill including at different elevation where the presence of walkways is observed. The solid cyanide product is delivered to N-E with solid colorant. The mine keeps a supply of colorant in case observation after mixing reveals absence of dye in shipment of reagent. According to interview and location drawing, 31 emergency showers and eyewash stations are distributed among all sectors of the mill to ensure easy access at all time. SDS in hard copies at the reagent storage building and electronic access to SDS at the mixing and mill are available to operators. The hardcopies and electronic versions of SDS are both in French and English and updated when necessary as per regulatory obligation.

SNC-Lavalin consultancy designed the mill building and included dry chemical portable fire extinguishers (class 4-A, 80-B:C) according to the Canada National Building Code. Inspection tags of portable fire extinguishers indicated monthly inspection is conducted. No CO2-based fire extinguishers were observed during the mill building visit or in other buildings where cyanide is present.

N-E has provided piping and tanks containing cyanide solutions with signs indicating its content. The observed sections of piping containing cyanide solution are identified with purple colored tape with cyanide mention. The frequency of this identification along a stretch of piping is considered adequate. As indicated previously, the mill cyanide solution piping system was completely replaced in 2017 and 2018 and signage on piping was part of the upgrade project. Induction

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.	
	and cyanide general awareness training describe the color-coding system used to identify cyanide piping and equipment. The flow direction of the solution is also indicated on the piping. N-E implements an event reporting and investigation management system corporate procedure at Eleonore mine. The event reporting and investigation procedure is applicable to any loss of cyanide bearing material (tailing, solution, slurry) containing $\geqslant$0.5 mg/L CN_{WAD} outside of engineered containment as well an exposure incident to employees.

Standard of Practice 6.3: Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.	
FINDING: The operation is in **full compliance** with Standard of Practice 6.3**.**	**BASIS FOR FINDING:** The operation is in Full Compliance with Standard of Practice 6.3 which requires that the site develop and implement emergency response plans and procedures to respond to worker exposure to cyanide. At the time of the site visit, a supply cyanokits (Hydroxocobalamine powder for infusion) were observed at its health clinic. The cyanokit is used according to an administration procedure aligned with a government agency medical procedure #008.The health clinic is also equipped with an automated external defibrillator, oxygen with valved mouthpiece and other first aid equipment. Oxygen cylinder with valved mouthpiece is also available in the mill corridor entrance, the cyanide mixing building's restroom and the ERT trucks. All operators working in the mill or mixing building are equipped with personal communication device, either a SONIM Technologies phone, two-ways radios and or classic mobile phones. The health clinic is staffed with two registered nurse at all time. A public health agency assigned physician, Dr. Lee, remotely supports the nursing staff 24/7 in case of cyanide exposure of worker. N-E's nurses are responsible for the medical equipment maintenance and ensuring availability of health clinic medical supplies including mill first aid kit, oxygen cylinders and AED (Automated External Defibrillator). The expiry date observed on the cyanokits at the health clinic is 30 January 2023. The medical supplies inventory is tracked electronically in an Excel file as well as in a binder kept at the health clinic and reviewed on a weekly basis by a nurse. Inspection records were reviewed. The cyanokits are stored at room temperature not exceeding excursion range of 15 to 30 degrees Celsius, as per manufacturer's recommendation. N-E developed and implemented written emergency response plan and specific procedures to respond to various cyanide incident scenarios that include worker exposure. Once the emergency notification is communicated to the security officer, the first responders and the medical staff on duty will be alerted of the event. The first responders are trained to decontaminate the victim, administer

	oxygen if needed, and bring the victim to the nurses using the health clinic dedicated emergency door. Following the transport of the victim in the emergency response truck, the nurses will evaluate the victim's condition and with the support of the assigned external physician on duty, will determine if the cyanide antidote will be administered and if medical evacuation will be required. The air lift medical evacuation involves a notification protocol with the public health authorities to ensure efficient transfer of victim. To this effect, N-E has formalized an agreement with the local nearest public hospital located in Chibougamau, Quebec. N-E has conducted mock drills in 2018, 2019 and 2020. The mock drill reports provide recommendations to improve the efficiency of the response execution.

4.7 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.

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 7.1.	The operation is in Full Compliance with Standard of Practice 7.1, which requires that the site prepare detailed emergency response plans for potential cyanide releases. N-E has a site wide emergency response plan with two dedicated sections on cyanide emergencies: HCN release and NaCN spill. The comprehensive ERP (Emergency Response Plan) was updated in 2019 and revised in 2020. The procedure section of the ERP (ref. 07) relates to 30 potential emergency scenarios including a HCN release and NaCN spill. Under the HCN release, subsection 26A presents a high level role and responsibility diagram further supported by a list of detailed actions to be taken by different individuals involved in the response. The same structure and information is provided for a NaCN spill under subsection 26B. However, more site specific cyanide-related information is provided in this subsection which is completed by 11 different NaCN spill scenarios and their response. The specific response measures to be implemented by the ERT members are detailed in the 11 scenarios that follow the general guidance section. These specific measures range from building evacuation, security perimeter delineation, incident command and refuge center establishment, spill containment and spill recovery process, decontamination of building or sector, sampling of affected area, decontamination of ERT members, waste management and process return to owner. The response measures ends with an incident investigation process and reporting to authorities. The nearest Cree community is located more than a hundred kilometers from the mine site. It is unlikely that the community would be impacted by a cyanide spill occurring at the mine. Nonetheless, the impact benefit agreement with the Wemindji community stipulates that any cyanide incident would be disclosed to the local representative. N-E assumes contractual responsibility of the supplied cyanide once the isocontainer is unpinned from the transporter's tractor truck inside the chemical storage building. N-E will move the isocontainer by truck between the chemical storage and the mixing buildings. This distance is less than 200 meters. The ERP scenario 2 and 11 covers for the potential emergency when the isocontainer are moved from storage to the mixing building. The ERP section 26B on cyanide spill incident contains general guidance on cyanide antidote usage, oxygen administration and first aid kits. The specific response measures to be implemented by the ERT members are detailed in the 11 scenarios that follow the general guidance section.

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 7.2.	The operation is in Full Compliance with Standard of Practice 7.2, which requires that the site involve site personnel and stakeholders in the planning process. The N-E ERP has been developed internally by mine managers and involved the ERT members for content validation. The Wemindji Cree community or the provincial government agencies did not directly participate in the development of the ERP but were kept informed about the plan. The April 2019 special band meeting was an opportunity for N-E to reiterate cyanide risks and emergency measures to be taken by local community representatives if traveling on the mine access road when cyanide transport trucks may be encountered or in the event of an isocontainer related spill incident would occur. The face-to-face meetings did not occur in 2020 due to the pandemic context and the vulnerability of the community from a public health perspective. Due to relative isolation of the mine site, N-E does not rely on external responders to address an emergency, including a cyanide emergency. The mine site operations have not changed significantly over the recertification period and the use of the local territory by the Cree representatives has also been limited to the same hunting, fishing and trapping activities according to interview. Thus, the ERP is considered current.

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 7.3**.**	The operation is in full compliance with Standard of Practice 7.3, which requires that the site designate appropriate personnel and commit necessary equipment and resources for emergency response. The N-E Emergency Response Plan is updated annually. It presents information pertaining to ER coordinator and alternate coordinator, their role and responsibilities, members of the ERT and their responsibilities, training and competency needs for ERT, call out process to ERT, equipment available and its inspection requirements. The routine inspections of ER equipment were conducted during the recertification period as shown by the review of records. There is no external entities playing a role in the immediate response to a cyanide emergency. However, N-E as planned for airlift medical evacuation and physician availability to assist site nurse if needed. The section 09 of the ERP on internal and external resources list useful names and contact coordinates in case of emergency.

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 7.4.	The operation is in Full Compliance with Standard of Practice 7.4, which requires that the site develop procedures for internal and external emergency notification and reporting. The N-E Emergency Response Plan is updated annually. It contains in section 09, management team coordinates (page 2), senior supervisor coordinates (page 3) and regulatory agencies coordinates (page 11). The ERP presents the contact information of the provincial Civil Protection agency, which according to the legal framework in the jurisdiction, is the organization mandated to coordinate the communications with affected communities. Media contact information is found at page 13 of section 09 of the ERP.

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 7.5.	The operation is in Full Compliance with Standard of Practice 7.5, which requires that the site incorporate in response plans, and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals. The ERP documents different cyanide spill scenarios and their associated emergency response measures to be implemented to contain and neutralize a liquid or solid release under dry or wet conditions. The contaminated soil or soil used as a berm is managed according to procedure ENV-PRO-02-IT-005. Depending on volume of contaminated soil, the material is either returned to the process or disposed at an authorized site through a specialized vendor. Any cyanide solution spilled outside the mill is pumped in totes, if possible, and directed to the cyanide detox stage of the process. A sampling procedure confirms that a sampling plan is to be prepared and approved by the environment coordinator and implemented by the environment technician to address the specificity of any cyanide spill. The sampling procedure details the sample preparation method, the analytical parameters to use by the external laboratory, the compliance criteria to respect and finally, six (6) pre-identified sampling points in the industrial sector of the mine. The applicable provincial soil quality criteria is used to determine the completion of remediation efforts. The compliance criteria for soil quality are found in the procedure along with sample preparation guidelines and pre-identified sampling points within the industrial sector of the mine. The drinking supply at N-E is from groundwater source, up gradient to all mine facility locations and protected from potential adverse impact by cyanide. N-E keeps a drinking water supply in bottles and can have potable water delivered by truck if necessary.

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

	The N-E ERP states the prohibition of ferric sulphate, hydrogen peroxide and sodium hypochlorite on cyanide release for every spill scenario involving water. The ERP indicates the need to communicate with the environment department to confirm if building and equipment decontamination, after an emergency response, is considered complete and to establish if additional monitoring is needed by following the ENV-PRO-02-IN02 procedure.

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

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 7.6.	The operation is in Full Compliance with Standard of Practice 7.6, which requires that the site periodically evaluate response procedures and capabilities and revise them as needed. The N-E ERP is revised annually and the last substantial update was performed in January 2019. The section 02 of the ERP presents the modification history of the ERP. As mentioned in question in question 8.3.6, mock drills were conducted in 2018, 2019 and 2021. The cyanide release simulations follow one of the spill scenario identified in the ERP. The simulations are documented in post mortem reports. The reports provide recommendations to improve the efficiency of the execution of the response procedure. The ERP presents a template for documenting a cyanide related emergency response should it occur at N-E. The “Situation Report” offers an opportunity to capture how the response was implemented and the document is analyzed by the ER coordinator who is in a position to initiate a change in the ERP, if suitable. No cyanide incident that mobilized the ERT members occurred at N-E during the recertification period.

4.8 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.

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 8.1.	The operation is in Full Compliance with Standard of Practice 8.1, which requires that the site train workers to understand the hazards associated with cyanide use. N-E offered cyanide awareness training to employees, contractors and visitors during the recertification period. The written training material is inclusive of the following elements: recognizing the cyanide materials present at the site (isocontainers, red liquid form during use); symptoms of exposure and health effects of cyanide; paths of human exposure; hydrogen cyanide exposure risk and detection; mine site areas of potential exposure; emergency measure (call in number) in case of exposure; and finally protective measures related to handling. N-E has established a 12 months refresher period for cyanide awareness training. Employees who have benefited from maternity leave or have been absent from N-E for a period over one year are automatically identified and need to register for cyanide awareness training. N-E Training Department maintains hard copy records of training and electronic records, which can be accessed from Conveyor, SAP and local IT network G drive.

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.

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 8.2.	The operation is in Full Compliance with Standard of Practice 8.2, which requires that the site train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment. N-E's developed a Mill Employee Training Program document. The training program highlights the strategy taken to ensure safe working procedures are followed and accidental release of cyanide is prevented. The training program is based on 12 distinct "training guides", one for each Mill sector as well as industrial wastewater treatment plant (IWTP) and reagent operator duty. The guides are a collection of all applicable procedures employees must integrate in order to execute tasks safely and without release to the environment. The training elements necessary for each job involving cyanide management are found in the cyanide awareness training material or directly from the operating procedures used as the training material. The operating procedures identify the

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.

	elements necessary for safe performance of the task, including work procedures, PPE and emergency response. Mill induction and operator training are lead by experienced operators. N-E criteria for determining qualification of trainer is based on successful completion of "Training Guide" process, at least one year of successful task execution and General Foreman vetting of individual to act as trainer or "*Compagnon"*. Employees are trained prior to working with cyanide and examination or task-based observations attest knowledge acquisition. Hardcopy training records indicated the name of the trainer and the employee, the training date, the topic or procedure covered in the training event. Hardcopies of examination, Task-Based Observations or signed off procedure that verifies the understanding of the material covered in training (Training Guide) is also archived in filing cabinets for the 2018-2021 period. Task Based Observations (TBO) are performed monthly by foremen to evaluate the effectiveness of the training and confirm operators' understanding of the task performed. TBO can lead to refresher training opportunities if needed. Training records are maintained on site in hard copy and electronic format between the 2018 and 2020 period. From 2020 onward, E-learning solution provider (SIM Experts /Cognibox) is supporting cyanide awareness training delivery and record retention. Mill training records are also found in hard copy and electronic format.

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

FINDING:	**BASIS FOR FINDING:**
The operation is in **full compliance** with Standard of Practice 8.3**.**	The operation is in Full Compliance with Standard of Practice 8.3, which requires that the site train appropriate workers and personnel to respond to exposures and environmental releases of cyanide. In addition to cyanide awareness training, mill operators and maintenance personnel receive specific mill-related risk induction training. The training includes the topic of cyanide emergency response procedure. N-E is equipped with a medical clinic managed by professional nurses. The emergency response for a cyanide exposure involves the ERT members trained as first responders but also mine rescue and HAZMAT. Decontamination prior to undertaking inspection, replacement or repair activities is included in SAP work orders on equipment. These procedures are part of the core training for maintenance workers. The ERT members are trained on the ERP as well as the use and maintenance of self-contained breathing apparatus and portable gas monitors. Training records and training plans for the ERT show coverage of foreseeable cyanide emergency scenarios.

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

	N-E maintains its own on-site emergency response capabilities, and their Emergency Response Plan does not rely on external parties. A government assigned physician can be reached at any time by N-E nurse to authorize an air medical evacuation to Chibougamau Hospital, if required. The Chibougamau Hospital medical staff is prepared to implement the cyanide exposure treatment and administer cyanide antidote accordingly. Refresher training in cyanide awareness, which includes exposure recognition and emergency response, is provided annually. Procedure reviews, including emergency response procedures, are conducted annually. Training for ERT members includes annual reviews of cyanide-related emergency procedures and spill response. As part of N-E's preparation for cyanide code certification in 2018, various mock drill scenarios were identified with the support of Chemours, the NaCN manufacturer at the time. Mock drills were conducted during the recertification period except for 2020 when the mill was shut down for three months due to Covid-19 pandemic. However, a mock drill was planned and executed on 31st January 2021 for both day and night work shifts. Each mock drill is followed by an ERT debrief session. The debrief sessions aim to identify opportunities for improvement. The debrief discussion topics are captured in a post mortem mock drill report where strength and weaknesses observed are translated into recommendations. N-E maintained training records for the ERT members in hardcopy and electronic format during the recertification period. Hardcopy training records indicated the name of the trainer and the employee, the training date, the topic or procedure covered in the training event.

4.9 Principle 9 – Dialogue

Engage in Public Consultation and Disclosure.

Standard of Practice 9.1: Provide stakeholders the opportunity to communicate issues of concern.

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 9.1.	The operation is in Full Compliance with Standard of Practice 9.1, which requires that the site Provide stakeholders the opportunity to communicate issues of concern. N-E has maintained an Environmental Committee (EC) since the implementation of the Impact Benefit Agreement in 2011. The committee provides regular opportunities for mutual interactions with Cree First Nation. This communication channel is further supported by a community complaint process where concerns can be shared directly or anonymously with N-E through email, voicemail or phone conversation. A Facebook page was launched in July 2020 to further facilitate Wemindji First Nation community members to voice their concerns regarding the Eleonore operations..

Standard of Practice 9.2: Initiate dialogue describing cyanide management procedures and responsively address identified concerns.

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 9.2.	The operation is in Full Compliance with Standard of Practice 9.2, which requires that the site initiate dialogue describing cyanide management procedures and actively address identified concerns. N-E has regularly provided information to Cree First Nations regarding cyanide use and management at the site, through the EC, community presentations, and as part of a cyanide spill response plan.

Standard of Practice 9.3: Make appropriate operational and environmental information regarding cyanide available to stakeholders.

FINDING:	BASIS FOR FINDING:
The operation is in **full compliance** with Standard of Practice 9.3.	The operation is in Full Compliance with Standard of Practice 9.3, which requires that the site make appropriate operational and environmental information regarding cyanide available to stakeholders. N-E makes operational and environmental information regarding cyanide available through community presentations, the Environmental Community, and employee newsletters. Some information is also available on the N-E public website. The Environmental Committee representatives of the Cree First Nation have received formal education and are considered literate. These representatives serve as official translators when Environmental Committee meetings occur in the Wemindji community. Although there is not always Cree words for cyanide related activities, translators are capable of conveying the cyanide awareness messages communicated by N-E committee members. There has been one case of confirmed cyanide release and no exposure incident during the recertification period. The cyanide release event occurred on 04 January 2021 at 10 AM. It involved an outdoor, uncontained and aboveground slurry pipe section between the leach circuit and the CIP intake tanks. An event notification was sent by email to the Environmental Committee members of the Wemindji community 2 days after the accidental release. The event was also communicated to the provincial environmental regulatory agency as required (communication dated 01/05/2021). The information regarding this event as communicated to the provincial regulatory agency is available to the public through the Act Respecting Access to Documents Held by Public Bodies and the Protection of Personal Information (A-2.1). A formal request would need to be filed by a community member or citizen in order to access the event information. Confirmed cyanide releases or exposure incidents, should they occur, are reported to regulatory agencies as required by legislation (e.g., Quebec province's Environmental Quality Act and Occupational Health and Safety Act). The publicly available 2020 Newmont Sustainability Report presents a fatality indicator ventilated per operations.

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