ICMI Cyanide Code Mining Recertification Audit

Summary Audit Report

Newmont Goldcorp Corporation, Cerro Negro Operation Argentina

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

2019 Audit Cycle

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Mining Operation: Cerro Negro

Mine Owner: Newmont Goldcorp Corporation

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Location and description of the operation

The Cerro Negro Project (Cerro Negro) is the legal entity of Oroplata S.A., a wholly owned subsidiary of Newmont Goldcorp Corporation (Newmont). On April 18, 2019 Newmont Mining Corp and Goldcorp Inc. merged to form Newmont Goldcorp Corp.

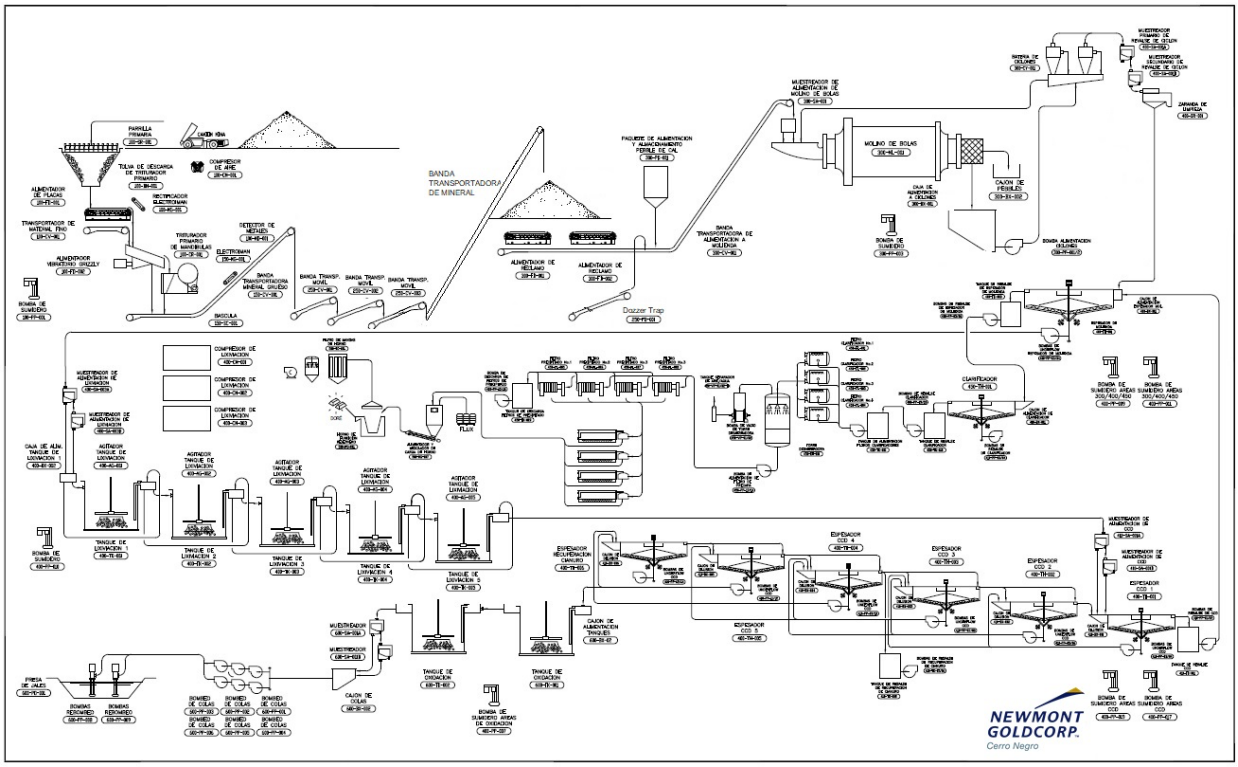
Cerro Negro is located approximately 60 kilometers southeast of Perito Moreno town in the province of Santa Cruz, Argentina. The nearest large town is Comodoro Rivadavia, located about 240 kilometers from the mine site. The project currently consists of two underground mines (Eureka and Mariana Central), ore processing facilities and miscellaneous infrastructure and support facilities. Tonnage capacity is 4,000 tonnes per day.

Cyanide was first received at Cerro Negro on March 3, 2014 and the first dore was poured July 25, 2014. Cerro Negro began commercial production on January 1, 2015 and became an International Cyanide Management Code (ICMC) Signatory mine on June 11, 2015. The International Cyanide Management Institute (ICMI) initially certified Cerro Negro on November 16, 2016.

Ore is extracted and then transported in haul trucks to the crushing area at the process plant. The mine's stockpile of ore is maintained on a pad near the crusher. Cerro Negro's design standards were found to be in compliance with the ICMC. The Cerro Negro processing plant consists of conventional metallurgical technology suitable for the style of ore mineralization. The process plant and associated service facilities process the run-of-mine ore delivered to the primary crusher. The process encompasses crushing and grinding of the run-of-mine ore, agitated leaching, counter-current decantation, solution clarification, the Merrill-Crowe process (de-aeration and zinc precipitation) and smelting to produce gold/silver bars that are shipped to a refinery for further processing. The counter-current decantation tailings are washed to recover cyanide prior to being detoxified by the INCO process (SO2 and air) and pumped to the lined tailings storage facility. The plant commenced initial feed on July 14, 2014 and the first gold was poured on July 25, 2014. The Process Plant processes 4,000 metric tonnes per day. The Tailings Facility is located 1.5 km east of the Process Plant. The tailings basin is approximately 50 hectares.

Permanent power from the national grid was supplied starting on February 2, 2015. The Cerro Negro Mine has no formal settlements within its boundaries and the closest towns are Perito Moreno (population 4,200), located approximately 75 kilometers away, and Las Heras (population 12,206), which is located 107 kilometers to the northeast and can provide basic services.

The Cerro Negro process plant is displayed in a schematic below. The operations in this schematic were reviewed during the certification auditing process. (Please note that the intensive leach reactor tank in the concentrated gravity circuit is for future development and is not currently operational).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NEWMONT GOLDCORP.
Cerro Negro

AUDITOR'S FINDING

The ICMI-approved Audit Team verified that the Cerro Negro operation is in **FULL COMPLIANCE** with ICMI Cyanide Code requirements for Gold Mining operations.

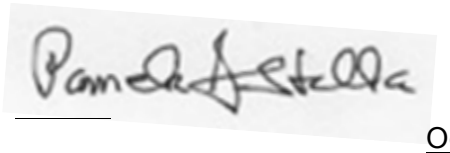
Cerro Negro has experienced zero cyanide incidents during this 3-year recertification audit cycle.

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

Audit Company:	Pamela Stella Environmental Mining Services, LLC
Lead Auditor:	Pamela Stella E-mail: pamelajstella@msn.com
Mining Technical Auditor:	Luis (Tito) Campos E-mail: titocampos@smartaccess.us
Date(s) of Audit:	June 25-28, 2019

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 (2018) and using standard and accepted practices for health, safety and environmental audits.



Cerro Negro		October 16, 2019
Name of Operation	Signature of Lead Auditor	Date

1. PRODUCTION: Encourage responsible cyanide manufacturing by purchasing from manufacturers who 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
□ in substantial compliance
□ not in compliance with Standard of Practice 1.1

Discuss the basis for this Finding/Deficiencies Identified:

Cerro Negro Mine is in FULL COMPLIANCE with Standard Practice 1.1 requiring the purchase of 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**.**

Cerro Negro purchases solid sodium cyanide exclusively from Orica International Pty Ltd. (Orica). The master purchasing agreement was originally valid through December 2015 and according to the agreement it has been automatically renewed for two years and will continue to be renewed in 2 year increments, unless otherwise requested. Confirmation was made during the audit that this certified supplier is the only supplier to the mine.

Cyanide that is delivered to the mine is produced at the Orica International Pty Ltd. (Orica) Yarwun plant in Queensland, Australia, and is then transported by rail, ship and truck to the mine. All portions of the Orica production, Australia, Peru, Chile and Argentina Supply Chain are certified by the International Cyanide Management Institute (ICMI).

Confirmation was made during the audit that the ICMC certifications are current and that the manufacturer's chain of custody letter matches the scope of the current certifications. The master contract includes language that both Cerro Negro and Orica will remain ICMI Cyanide Code Signatories and shall achieve and maintain ICMC certification. No distributors are used to supply this mine.

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

Standards 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.

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

Discuss the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard 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.

All ICMC requirements relative to packaging, labeling in local language, storage, route risk assessment, community involvement, security, loading, unloading, and emergency response are clearly defined in the contract between Cerro Negro and Orica. Orica is contractually responsible for all in-transit spill response actions. Per the conditions of the master-purchasing contract with Orica, Cerro Negro takes formal ownership of the cyanide once the cyanide is offloaded at the warehouse. Cerro Negro personnel have detailed procedures and controls in place for the unloading, handling and storing of the cyanide in a secure facility at the mine site pending its mixing and use.

The Australian supply chain of cyanide from Orica's Yarwun Facility to the Port of Brisbane and the storage within the Toll Customized Solution Production Facility was re-certified on August 20, 2018. The Orica Australia Limited Latin America Supply Chain was re-certified by the ICMI in January 2018. The most recent recertification of the Australian Supply Chain was on August 20, 2018. Orica's Global Marine Supply Chain was re-certified January 16, 2018 and includes the shipping lines Maersk and Hamburg Sud that are the shippers that pertain to Cerro Negro. Orica's Global Marine Supply Chain also includes the destination ports of Buenos Aires, Callao, Puerto Deseado, and Punta Arenas, the ports that can be used for cyanide transportation for Cerro Negro. Within Peru, solid sodium cyanide is transported to Orica's production transfer facility in Ventanilla, Peru. Within Argentina, solid sodium cyanide is transported by road to Cerro Negro by Victor Masson Cruz del Sur S.A (Cruz del Sur), which was re-certified in February 2017.

All entities involved in the supply chain to Chile (production, packaging, transportation, and interim storage) are under the direct control of Orica. The transportation of the cyanide from Chile to Cerro Negro and offloaded into Cerro Negros' warehouses are the responsibility of Cruz del Sur.

2.2 Require that cyanide transporters implement appropriate emergency response plans and capabilities, and employ adequate measures for cyanide management.

The operation is: ■ in full compliance

□ in substantial compliance
□ not in compliance with Standard of Practice 2.2

Discuss the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 2.2 requiring that cyanide transporters (Orica and Cruz del Sur) implement appropriate emergency response plans and capabilities, and employ adequate measures for cyanide management.

Cerro Negro only purchases solid sodium cyanide from Orica International Pty Ltd. (Orica). The master purchasing agreement was originally valid through December 2015 and according to the agreement it has been automatically renewed for two years and will continue to be renewed in 2-year increments, unless otherwise requested. Confirmation was made during the audit that this certified supplier is the only supplier to the mine. The conditions of the master contract include the requirement that Orica will remain Signatory to the ICMI Cyanide Code and shall achieve and maintain ICMC certification for all parts of its supply chain used to provide cyanide to Cerro Negro.

All Orica transportation partners in this supply chain (truck, rail, ship, and interim storage yards) have demonstrated compliance to the ICMC Transportation Protocol, which requires that the operations have appropriate emergency response plans, response capabilities, and cyanide management practices. Orica's production transfer facility in Peru was audited using the ICMC Production Protocol, which also requires that the operations have appropriate emergency response plans, response capabilities, and cyanide management practices.

The auditors reviewed the ICMC Summary Audit Reports of the entire transportation supply chain on the ICMI website to demonstrate full compliance with the ICMC transportation protocol from the Orica production plant to Cerro Negro.

Cerro Negro maintains delivery records for cyanide shipments to the warehouse at the Mine from the Yarwun facility in Australia. The auditors reviewed Bill of Lading Multimodel Transport or Port-to-Port shipment forms for the time period from June 17, 2016 to June 17, 2019. These records show that each of the parties in the supply chain is included in the ICMI transportation audit results of the transporters.

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

Standards of Practice

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

The operation is: ■ in full compliance

□ in substantial compliance
□ not in compliance with Standard of Practice 3.1

Discuss the basis for this Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 3.1 requiring the design and construction of unloading, storage and mixing facilities consistent with sound, accepted engineering practices and quality control and quality assurance procedures, spill prevention and spill containment measures.

Cerro Negro facilities for unloading, storing and mixing cyanide at the Process plant have not been modified since the initial certification audit in 2016, which at that time were found to be in compliance with the Code requirements.

The storing and mixing facilities were designed and constructed by M3 Engineering & Technology Corp (M3) and are in accordance with sound and accepted engineering practices. The design package includes foundation, concrete, and steel specifications. The auditors verified that the site has retained the QA/QC and design drawings of the warehouse and the offload area.

Cerro Negro is located in an area approximately 70 kilometers upstream from the nearest surface water body (Rio Deseado) and ranch. Therefore, the cyanide warehouse and offload facilities are located a safe distance from the public and away from locations where workers may congregate.

Cerro Negro does not receive liquid cyanide.

To prevent the overfilling of cyanide storage tanks Cerro Negro has level sensors installed on the cyanide mixing and distribution tanks. The levels are continuously monitored in the plant control room via the distributed control system. The sensor instrumentation is equipped with an audible/visual alarm system. The auditor observed screen shots in the control room that indicated the level controls were functioning on these tanks.

Process tanks, including mixing and storage tanks, are secured to solid, reinforced concrete foundations. The containment floor and tank foundations are monolithic and the floor is thickened beneath the foundation plinths. This foundation and floor system serves to prevent any seepage from the tank bottoms from entering the ground.

The entire process area is contained within a reinforced concrete pad surrounded by curbs, parapets and stem walls, providing a competent barrier to seepage. This was confirmed through visual examination and review of as-built drawings. The auditors observed that all of the concrete foundations were in good condition.

The warehouse has a concrete floor and is covered with a metal frame and corrugated metal roof to minimize the potential for contact with rainwater and snow melt. There is passive ventilation in the warehouse to prevent build-up of hydrogen cyanide gas. The cyanide storage

area is located within a secure area. Cerro Negro does not store any other chemicals, explosives, food, animal feed or tobacco products in the cyanide storage warehouse other than cyanide. No smoking, drinking or eating is allowed within the cyanide storage areas or the mill. The liquid sodium cyanide in the cyanide mixing and distribution tanks is stored in the reagent area of the mill with a venting system within the mixing and storage tanks. Hydrogen cyanide (HCN) monitoring with alarms is provided at the cyanide mixing area. The mill building where the cyanide mix and distribution tanks are located is in a secure area where public access is prohibited. The cyanide mix and distribution tanks are located within a separate concrete berm and sump area that would prevent mixing of other reagents in the event of spills. There are no food, animal feed or tobacco products stored in the mill building.

The 2016 Detailed Audit Report for the initial certification stated that in the process plant the entire process area is contained within a reinforced concrete pad surrounded by curbs, parapets and stem walls, providing a competent barrier to seepage. The concrete floor is sloped to drain to concrete trench drains, where any spills will be pumped to the grinding thickener tank. There have been no modifications to the mixing and distribution tanks since the initial certification audit.

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

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

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Discuss the basis for this Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 3.2 requiring that unloading, storage and mixing facilities use inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

Cerro Negro has procedures with respect to empty cyanide containers to prevent reuse of the containers. Cerro Negro has written procedures for the management, rinsing and disposal of the super-sacks and wooden boxes. A cyanide mix was observed to verify that the operation is following its procedures for mixing and disposal of the cyanide boxes and super-sacks (bags). After mixing, the boxes are dismantled and the bags triple-rinsed. The rinse solution drains into the mixing tank. The dismantled boxes and rinsed bags are temporarily stored in a locked on-site facility and then ultimately disposed of in an off-site certified landfill. The auditors reviewed the chain of custody records for the individual boxes to verify that Cerro Negro does not return any cyanide containers to the vendor and that the empty boxes and rinsed bags are disposed on in the off-site certified landfill.

Cerro Negro has a written procedure Preparation of Cyanide that outlines the requirements for inspection, observation and mixing of cyanide. This procedure includes instructions for the

operation of critical valves related to the addition of caustic, raw water and connection with the Storage tank and operation of valves and couplings during the mixing. There are two procedures that cover the handling of cyanide containers. One procedure is for the offload from the transporter into the warehouse and the second procedure is for the transportation from the warehouse to the process plant. Cerro Negro has written procedure for the warehouse that specifies a maximum stacking height of three boxes in the warehouse. The procedure Preparation of Cyanide addresses the requirement for prompt clean-up of solid cyanide spills during mixing. The procedure Preparation of Cyanide requires that personnel wear PPE including Tyvek ® suits, full-face shield, dust respirator, hardhat, rubber boots, acrylic nitrile gloves and a personnel HCN monitor during mixing. The procedure requires that a minimum of four operators be present for the mixing. There are two cameras that provide coverage of the mix activity to the control room. The auditors observed a cyanide-mixing event during the audit and verified that Cerro Negro has developed an appropriate checklist, defined the safe tasks, and appropriate observation to safely complete and document all mixing events.

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

Standards of Practice

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 4.1 requiring the implementation of management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures.

Cerro Negro has developed written management and operating plans and procedures for the cyanide facilities in order to protect human health and the environment. Procedures and operating plans cover the cyanide operations at the cyanide storage warehouse, the cyanide mix and distribution tanks, ball mill, leach tanks, the counter-current decantation (CCD), cyanide oxidation circuit, emergency pond and the tailings facility. Cerro Negro has safety work procedures for the cyanide storage and offload areas, the ball mill, leach tanks, CCD circuit, Merrill-Crowe Plant, cyanide solution pipelines and the associated containment channels, the oxidation plant, and the tailings facility. These procedures include the tailings pipeline, process tanks and vessels (mixing and distribution tanks, de-aeration tower, pregnant solution tank, barren solution tank, clarifier and thickener tanks, and clarifier filters), the associated piping, pumps, valves and secondary containments. Procedures were reviewed and were found to be sufficiently detailed to enable safe operation. The auditor reviewed these

plans and procedures and interviewed plant operators, maintenance and environmental personnel and verified that Cerro Negro understands how to manage cyanide in a manner that prevents releases to the environment and exposures to workers and the community

Cerro Negro has plans and procedures that form the basis of the facility design and operation. M3 Engineering prepared the design criteria, assumptions and parameters for the cyanide mix and distribution area, the Merrill-Crowe circuit, milling, leaching, CCD, and the cyanide destruct and oxidation plant. Golder Associates prepared the design criteria, assumptions and parameters for the tailings facility and initial water balance. MWH Global Inc. (MWH) prepared the updated water balance.

Critical design criteria such as freeboard, cyanide concentration, design storm events for the tailings facility, and water flow rate information are included in the detailed studies. Operational requirements and control points form the detailed feasibility studies and project deliverables were incorporated into standard operating procedures (SOPs). Operating plans and procedures were reviewed during the audit. Interviews were held with personnel responsible for the operation and maintenance of the facility.

Cerro Negro has developed and implemented work procedures for cyanide related tasks, which describe the standard practices necessary for the safe and environmentally sound operation of the cyanide facilities. The operation has identified equipment, personnel, and procedures for the process plant, tailings facility and all associated piping and pumps that have contact with cyanide.

Cerro Negro's Management of Change procedure describes the different types of changes that may occur at the plant (equipment, process, maintenance, materials, personnel, software, etc.). The purpose of the procedure is to ensure that systematic processes are in place to evaluate any changes at the plant so that the risks of incurring negative impacts to people, environment, property, or product quality are minimized.

The operation has implemented contingency procedures for the process plant and tailings facility to respond to upsets in water balance, problems identified by inspections, and to address temporary closure of the operation. Procedures include step-by-step measures for stopping and starting the plant facilities, what to do in the event of a power outage, how to provide response measures for emergencies related to failures of cyanide equipment, and response plans to address upsets in the process water balance.

Cerro Negro maintains a program to inspect cyanide facilities on a frequency that was found to be sufficient to assure that the operation is safe and is functioning within design parameters. The auditors reviewed records for the time period of this re-certification audit and verified that inspections were being done in a consistent manner.

Personnel perform weekly visual inspections of the process plant and inspect all cyanide tanks for signs of corrosion and leakage; secondary containments for their integrity, the presence of fluids, and to ensure drains are closed and locked; the spill collection systems at the cyanide preparation, process area and trenches; the process facilities, pipelines, pumps and valves for

signs of corrosion and leakage. Operators perform daily inspections of water levels in the tailings pond and the surface water diversions upgradient from the tailing storage facility that prevent run-on into the tailings facility.

The auditors reviewed inspection records for the last 3 years of the cyanide facilities and verified that inspections are conducted on a consistent manner. Records include the date of inspection, the name of the inspector, and any observed deficiencies. Corrective measures were noted directly on the hard-copy inspection records in the situations where deficiencies were noted.

Cerro Negro has a documented preventive maintenance program to ensure that equipment and devices function as necessary for safe cyanide management. The preventive maintenance program is used to perform necessary maintenance and to inspect the integrity of process equipment, piping and tanks, according to a maintenance program and to keep equipment and installations properly working.

The operation has two Caterpillar C-175 diesel-powered generators (2,000 kW each), located at Area 700 in the process plant, for use in the event of a power outage. The power required to operate the critical areas of the plant is approximately 3,600 kW. The crusher will not work during power outages, as the purpose of the generators is to prevent loss of product. In the event of a power outage, the ball mills will stop operating and the electronic controllers on the cyanide feed lines from the day tank will stop flow to the ball mills. Cerro Negro has also implemented the procedure Generators and Transformers Maintenance Procedure to establish the preconditions to launch the generators, and to ensure the leader of the maneuvers by the communication channel is a single person and whoever coordinates with other power plants to avoid accidents or damage to property. The preventive maintenance program for the generators includes weekly maintenance and complete overhauls every three years by the Caterpillar dealer. Additionally, the generators are run for 15 minutes every other day. The auditors reviewed maintenance records from the Caterpillar dealer and weekly maintenance records were reviewed during the audit, which also document the routine 15-minute start-ups.

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

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

Discuss the basis for this Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 4.2 requiring management and operating systems that minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

Cerro Negro conducts a program to determine appropriate cyanide addition rates in the mill and evaluates and adjusts cyanide addition rates as necessary. Cerro Negro has a written

procedure for metallurgical testing of mineral samples to avoid incidents and accidents to people, equipment and the environment. Cerro Negro adjusts the cyanide addition rates based on monthly composite samples and analysis from tank CCD 6 (last tailings tank prior to cyanide destruction) and completes diagnostic leach testing to determine the association between silver and gold not recovered.

Cerro Negro has implemented a strategy to control its cyanide addition by monitoring cyanide concentrations at the barren and pregnant solution tanks, leaching tanks #1, 3 & 5, the oxidation tanks 1 & 2 after oxidation treatment, the underflow at CCD tank 6 (prior to cyanide destruction and the tailings facility discharge spigots. Cerro Negro will then adjust the cyanide addition based on the results of the analysis.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 4.3 requiring a comprehensive water management program to protect against unintentional releases.

Cerro Negro has a water balance that is specifically intended for management of the tailings storage facility to prevent overtopping and is both probabilistic and comprehensive. The auditors found the water balance to be reasonable and appropriate for the facilities and environment. The model considers the tailings deposition rate into the tailings storage facility and the design storm and return interval duration that provides a sufficient degree of probability that overtopping of the tailings facility can be prevented during the operational life of the facility. The water balance uses data from two on-site meteorological stations. Run-on to the tailings facility is not considered because all run-on is diverted. The model can account for effects of freezing and thawing. Solution losses due to evaporation at Cerro Negro can be significant. The model accounts for evaporation and solution pumped from the seepage collection system to the tailings facility. Losses to surface water are not considered because there are no discharges to surface water. Power outage is considered (even though there are backup generators); treatment capacity is not considered because there is no discharge to surface water. The impact from the phreatic surface is not considered because the groundwater table is at least 2 - 3 m below the liner.

Cerro Negro conducts inspections of operating levels in the tailings disposal facility, the emergency pond, the surface water diversions around the tailings facility and the channel for the tailings delivery pipeline. Cerro Negro produces quarterly and annual reports that include surveyed water levels, bathymetric data, tailings surface, and piezometer data. Cerro Negro has developed a standard operating procedure (SOP) for upset conditions in the water balance. The auditors reviewed completed examples of inspection forms.

The tailings facility and emergency pond were designed with adequate freeboard above the maximum design storage capacity determined by the water balance. The auditors observed that the tailings and emergency ponds are being monitored and operated with the adequate freeboard and reviewed examples of completed inspection forms. The water balance model tracks the projected pond levels on a daily basis, thereby allowing operating practices to be revised as necessary in real time.

Cerro Negro measures precipitation and compares the results to the design assumptions. The water balance model is updated annually with meteorological data collected from two on-site meteorological monitoring stations. The auditors reviewed the on-site meteorological monitoring data and found it to be complete.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 4.4 requiring measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

Cerro Negro has no open waters with WAD (Weak Acid Dissociable) cyanide concentrations exceeding 50 mg/l. The tailings impoundment supernatant pond is maintained well below the 50 mg/L WAD cyanide. Verification was made through review of water quality analyses of the tailings solution prior to discharge into the tailings facility and from the active spigot discharge into the tailings facility.

Cerro Negro has a bird deterrent system (i.e. noise blasts) at the tailings facility. A perimeter fence around the tailings facility restricts wildlife access to the supernatant pond. Cerro Negro has not had any cyanide-related wildlife mortalities. Cerro Negro maintains a formally documented wildlife protection and monitoring program. Daily inspections of the tailings facility are conducted to observe for wildlife.

Cerro Negro does not have heap leach operations.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 4.5 requiring measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

Not applicable because Cerro Negro does not have any direct or indirect discharge to surface water. Surface water in the vicinity of Cerro Negro is ephemeral, flowing only in response to rainfall; there are no nearby perennial surface water features such as springs, rivers, or lakes. Cerro Negro conducts a regional surface water-monitoring program. The nearest flowing surface water body is more than 70 kilometers downstream from Cerro Negro. The auditors reviewed analytical data and verified that there have not been any recorded exceedances of WAD or Free cyanide in the regional surface water monitoring stations.

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
□ in substantial compliance
□ not in compliance with Standard of Practice 4.6

Discuss the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 4.6 requiring measures to manage seepage from cyanide facilities to protect the beneficial uses of ground water.

The Process Plant is designed and operated to manage seepage and protect groundwater quality. The entire process area, including the cyanide offload area, is contained within a reinforced concrete pad surrounded by curbs, parapets and stem walls, which provide a competent barrier to seepage. The concrete floor is sloped to drain solution into a common sump and then pump the solution back into the process circuit. All process tanks at the Plant are secured to solid, reinforced concrete plinth (pedestal-type) foundations. The containment floor and tank foundations are monolithic and the floor is thickened beneath the foundation plinths. This foundation and floor system serves to prevent any seepage from the tank bottoms from entering the ground. All solutions are contained in process tanks and columns with secondary containment provided by the concrete floor of the plant in order to prevent seepage to groundwater.

Cerro Negro has two French drains around the circumference of the plant for monitoring and evacuation of near surface water. One of the French drains detected low concentrations of WAD cyanide in July 2017. Cerro Negro designed and installed a new French drain in November 2017 as a remedial measure. The auditors reviewed analytical data that verifies that WAD cyanide concentrations are non-detect since the installation of the new French drain.

The tailing facility is an engineered lined facility and the tailings delivery pipeline is contained within a concrete ditch.

Cerro Negro has a network of groundwater wells around the tailings facility and process plant. There is one groundwater well for provision of industrial water to the process plant. There are no beneficial domestic or agricultural uses of groundwater beneath and/or immediately downgradient of Cerro Negro. All of the wells are sampled monthly and analyzed for WAD, free and total cyanide along with other water quality parameters. The auditors reviewed analytical results from samplings since the wells were installed and verified that the data was non-detectable concentrations for WAD, free and total cyanide.

In 2017 Cerro Negro detected WAD cyanide in the underdrain collection ponds (Muros) 3 and 4 (the ponds). Although analytical data from groundwater wells down gradient from the ponds had no detectable concentrations of WAD, free or total cyanide, Newmont implemented a seepage interception program in June 2018. The cyanide seepage interception system is located upgradient from the ponds and includes a trench interception system and pumping wells. The ponds 3 and 4 have shown decreasing concentrations of WAD cyanide since the seepage collection system was improved and pumping wells were installed. At the time of this recertification audit the WAD cyanide concentrations at pond 3 were below 1.6 mg/l and at pond 4 were below detection limit of 0.5 mg/l.

Cerro Negro does not use mill tailings for underground backfill.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 4.7 in providing spill prevention or containment measures for process tanks and pipelines.

Cerro Negro provides spill prevention and containment measures for all cyanide unloading, storage, mixing and process solution tanks. The auditors conducted a field inspection at the process plant and the unloading, storage, and process areas. The auditors observed that all tank foundations and concrete secondary containments were in good condition at the time of this recertification audit. No changes to the spill prevention or containment measures for cyanide offloading, storage, mixing and process plant have occurred during the time period from the last recertification audit. All areas are built on concrete and secondary containment in place for all production areas, as well as all cyanide unloading areas. Review of the deign drawings for the Process Plant, cyanide warehouse and the tailings storage facility and pipeline was completed during the initial 2016 certification audit and were found to be in full compliance. There have been no cyanide-related changes to the plant since the initial audit in 2016.

Sump pump systems are installed in the process area. Systems detect the presence of liquid in the secondary containment area and turn on automatically to drain the secondary containment area back into the process circuit. Secondary containment areas for the cyanide tanks are linked to provide sufficient containment volume for the largest tank within the linked secondary containment area, pipes leading that would drain back into the area, and a significant storm event.

Cerro Negro has dedicated pumps within secondary containment collection areas that remove solutions and return them into the process circuit. There is no discharge of cyanide-containing water from the secondary containment areas. The automatic pumps are part of the defined preventive maintenance program.

All cyanide process tanks and cyanide process solution pipelines have concrete secondary containment. The auditor observed that the secondary containments were in good condition and maintained empty, with no materials stored within them.

There have been no pipeline containment changes at Cerro Negro since the initial certification audit. The DAR 2016 states that all cyanide process solution pipelines at Cerro Negro have spill prevention or containment measure for cyanide solution pipelines to collect leaks and prevent release to the environment. The process solution pipelines at the process plant include concrete secondary containment. The pipeline that carries slurry tailings to the tailings facility is within a concrete trench. Cyanide pipelines are inspected daily as part of the routine inspections by plant personnel.

There are no surface waters near the plant; the nearest river is approximately 70 km downstream of the plant. The auditors verified that no cyanide pipelines present a risk to surface discharge.

Material specifications and construction material testing records for all cyanide tanks and pipelines at the process plant and tailings facility were found in compliance according to the initial certification audit DAR in 2016. They are made of carbon steel, stainless steel, fiberglass, HDPE and polyvinyl chloride (PVC) or other materials compatible with cyanide There have been no modifications to the tanks and pipeline since the initial audit.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 4.8 requiring quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

Cerro Negro implemented Quality Assurance and Quality Control (QA/QC) programs during construction of cyanide facilities, as is described and found in compliance in the initial certification DAR in 2016. M3 Engineering & Technology Corp (M3) designed the process plant and was in charge of the QA/QC program; Golder Associates designed the tailings storage facility and subsequent raises and performed the QA/QC supervision.

As stated in the Cerro Negro initial certification DAR in 2016, the QA/QC documentation for the Process Plant and the tailing storage facility includes appropriate testing concerning the suitability of materials, welding, concrete, adequacy of earthworks and soil compaction, and installation of geomembrane liners. The program included the quality of metal fabrication at the tank vendor. The program included subgrade and concrete testing including suitability of materials, fabrication, electrical, mechanical, instrumentation, piping, concrete, and earthworks. A raise to the tailings storage facility was completed in 2018. The auditors reviewed the QA/QC documentation for the raise and determined that it followed the same format as the QA/QC documentation for the initial tailings storage facility.

Cerro Negro retains construction QA/QC files in hard copy and electronically in the document control room. The auditors verified that the hardcopy of the QA/QC documents have been retained.

The DAR 2016 stated that the auditors reviewed records of construction reports, including as-built drawings for the cyanide facilities. A qualified engineer stamped the as-built drawings. QA/QC reports were signed by qualified personnel from reputable engineering companies and provided documentation that the facilities were built as designed.

Cerro Negro built a raise (Phase II) on the tailings storage facility since the initial certification audit. A qualified engineering company designed and was responsible for the Quality Assurance/Quality Control of the raise construction. The engineering company produced design reports (November 2016) that included Control of Quality Assurance and Technical Specification for Earthworks, geosynthetic liner, pipelines and valves and instrumentation. The same company also performed the slope stability analysis of the raise. Sandin Hnos S.R.L was the earthworks contractor. Daily and Bi-Weekly reports were produced which included QA/QC inspections during construction. Auditors reviewed these documents to verify that the tailings raise was constructed in accordance with the design drawings and technical specifications. The auditors verified that the QA/QC documents are stamped and signed by the engineer and are retained in the on-site document room.

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

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

□ not in compliance with Standard of Practice 4.9

Describe the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 4.9 requiring implementation of monitoring programs to evaluate the effects of cyanide use on wildlife, surface and ground water quality.

Cerro Negro has prepared and implemented a written standard procedure for the monitoring activities used to evaluate the effects of cyanide use on wildlife, surface water and groundwater quality. Appropriately qualified personnel in the environmental department developed the wildlife monitoring and surface and groundwater sampling procedures and protocols. The certified analytical laboratory that conducts the groundwater sampling prepared the groundwater-sampling plan for Cerro Negro.

The procedure for groundwater sampling describes how samples should be taken, sample preservation, chain of custody procedures, sample handling, shipping instructions and cyanide species to be analyzed.

Cerro Negro's monitoring reports record in writing the weather conditions, the presence of wildlife and cattle, field parameters (i.e., conductivity, pH, temperature), groundwater levels, and other characteristics of the water (i.e., color and smell). The auditors reviewed completed field forms and verified that Cerro Negro records this information.

Cerro Negro is a zero discharge facility and does not discharge process water to any location. Cerro Negro monitors groundwater quality down gradient and up gradient of the tailings facility and the process plant to ensure that indirect discharges are not occurring. There are no surface waters near the site but Cerro Negro conducts surface water monitoring on a regional basis.

Wildlife mortality monitoring is part of the daily inspection that includes a field form. The auditors reviewed examples of completed forms and found them to be adequate.

The monitoring frequency at Cerro Negro of groundwater wells, surface water and wildlife is appropriate for the characterization and timely identification of changes.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 5.1 requiring implementation of a plan and procedure for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.

In October 2018, Cerro Negro updated the written Conceptual Closure Plan (dated April 28, 2016) with written procedures to decommission the cyanide facilities including: processing facilities (i.e. warehouse, process tanks, piping, concrete foundations), emergency pond and tailings facility.

Cerro Negro has developed a Gantt Chart Implementation Schedule for closure that includes the major decommissioning activities for the cyanide facilities. The sequence of activities is shown with reference to years after closure. This schedule will be refined as Cerro Negro approaches the closure period.

Cerro Negro's Conceptual Closure Plan includes a statement regarding review and revision of the Plan indicating that Newmont requires all estimated closure costs be reviewed and updated as needed every year and the closure plan be reviewed and updated every 3 to 5 years depending on the site's jurisdiction or when a significant change in operations or expansion occurs.

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

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

Describe the basis for this Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 5.2 requiring establishment of an assurance mechanism capable of fully funding cyanide-related decommissioning activities.

Cerro Negro has developed a cost estimate model, the Standardized Reclamation Cost Estimator (SRCE), to fully fund third party implantation of the cyanide-related decontamination measures identified in its site's decommission plan. The cost estimate includes add-on percentages for third party engineering design and contract administration. The cost estimate was updated in 2018. The estimate includes the applicable cyanide facilities for milling, leaching, the CCD circuit, the Merrill Crowe plant, the cyanide recovery and Oxidation Circuit and the tailings storage facility, as well as other non-cyanide facilities.

Cerro Negro reviews and updates the cost estimate yearly as part of its Asset Retirement Obligation Policy, the corporate financial accounting procedure.

The local government does not require financial guarantees; however a third-party financial auditing firm confirmed that Newmont has the ability to fund all of its financial liabilities, including the closure of the Cerro Negro Mine. The auditing firm audits Cerro Negro annually. The auditors reviewed documentation provided by Newmont from a Chartered Accountant verifying Newmont's conformance with the financial tests for a self-guarantee mechanism to cover the estimated costs for cyanide-related decommissioning activities. The auditors reviewed a letter dated August 16, 2019 by Ernst & Young LLP confirming that Newmont meets the criteria for self-guarantee.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 6.1 requiring identification of potential cyanide exposure scenarios and implementation of necessary measures to eliminate, reduce and control them.

Cerro Negro has procedures that describe the management and operation of cyanide facilities to help minimize the possibility of worker exposure to cyanide. The procedures have been developed for the cyanide storage area, preparation area and process areas at the plant. The procedures provide detailed information for the risks involved with each task (including cyanide preparation, plant operations, cyanide gases monitoring, equipment decontamination prior to maintenance) and adequately describe safe work practices.

The procedures have a section of safety considerations that includes detail task specific Personal Protective Equipment (PPE) requirements, minimum training requirements and response to contingencies. Changes to the procedures are tracked at the end of each document. Some procedures have checklists to support its implementation in the field (e.g. cyanide preparation). Verification of the written procedures included review of the specific task and worker interviews. The procedures are reviewed and updated on a regular basis (at least once a year) and personnel working with cyanide are trained on these procedures once a

year.

Cerro Negro procedures require the use of PPE and address pre-work inspections for cyanide related tasks. Cerro Negro general safety training program and task specific training also discusses PPE requirements. Signage is located throughout the process plant indicating PPE to be used in each area. In addition to the use of general PPE, such as hard-hat, steel-toe shoes, hearing protection and safety glasses, areas and/or tasks where personnel may come into contact with cyanide have additional PPE requirements. Observations during the audit confirmed that hard-hat, hearing protection, rubber boots, rubber gloves, chemical suits, face shields, approved respirator and HCN monitors were in use for tasks that were performed at the cyanide preparation area.

Pre-work inspections are also addressed through the mine's pre-work risk assessment process (ATS – Safe Work Analysis) performed in order to obtain a work permit. In addition, Cerro Negro has a Five Point Card system (Tarjeta de 5 Puntos) to analyze routine activities. Maintenance personnel need to obtain a work permit prior to any activities in the process areas. The work permit includes an analysis of the risks associated with the work to be conducted. Examples of work permits and Five Pont Cards were reviewed and found to be acceptable.

Cerro Negro has developed and implemented a management of change (MOC) process for operational changes in the plant to ensure that a systematic process is followed to evaluate changes at process facilities so that potential negative impacts to health and safety of employees and the environment are minimized. The MOC process is to be used to evaluate proposed changes to: procedures, reagents, dosing points, safety controls and sensors, equipment, processes, among others. Records of training in the MOC process were available and reviewed by the auditors.

Cerro Negro actively considers worker input into the development of health and safety procedures through various mechanisms, including daily safety meetings (5-minute talks), training sessions and investigation of incidents. During the daily safety meetings there is direct communication between supervisors and operators where worker input is considered to improve existing procedures. Records of daily safety meetings conducted in the last three years including discussion of safety issues related to cyanide were reviewed by the auditors. The auditors also reviewed examples of the 5 Point System cards including input from workers. Procedures related to cyanide management are reviewed and/or updated periodically with the participation of process operators. In the case of incidents investigation, workers also have the opportunity to provide input on how to improve safety procedures.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 6.2 requiring that cyanide facilities are operated and monitored to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

Cerro Negro has determined the appropriate pH for limiting the generation of HCN gas during cyanide mixing and production activities. Procedure for Cyanide preparation requires a pH of 11.5 at the mixing tank prior to starting the mixing process. pH levels are regulated with sodium hydroxide. Observation of a cyanide mixing event confirmed that the mix tank pH was checked and recorded in the checklist prior to initiating the mixing process. Procedure Sodium Cyanide Dosage indicates pH levels are to be maintained between 10.2 and 10.8 after cyanide preparation. This is done to limit the evolution of hydrogen cyanide gas during processing activities. Cerro Negro has online pH probes in their cyanide tanks and process circuits. Fixed pH meters are maintained on a monthly basis for calibration purposes, and every 3 and 6 months for more detailed maintenance work including instrumentation and electrical components.

Cerro Negro uses fixed and personal (handheld) monitoring devices to confirm that controls are adequate to limit worker exposure to hydrogen cyanide (HCN). According to Newmont internal requirements and Argentinian regulations, HCN alarms of both handheld and fixed monitoring devices are set to visually alert operators at 2.1 ppm (preventive) and 3.7 ppm (evacuation), which is more stringent than the values recommended by the Code. These two HCN values are also specified in the procedures related to cyanide management. HCN visual and audible alarms are set to alert operators. A total of nine (9) fixed HCN monitors are located throughout the process facilities.

Cerro Negro has identified the areas where workers may be exposed to cyanide. These areas are: Area 800 at the cyanide preparation tanks including both the platform to access the mixing tank and the lower part of the tanks; Area 300 at the gravitational cyclone; Area 400 at leaching tanks #1 and #3; and Area 600 at the oxidation tanks #1 and #2. Operational areas where there is potential for worker exposure to cyanide are identified and monitored with fixed HCN gas monitoring units. Fixed HCN monitors are located throughout the process plant. Handheld HCN monitors are provided and made available for use in areas where there is a potential for HCN exposure. Procedures have been developed for all activities in which cyanide management is involved. These procedures include a section where the PPE requirements are listed. Signage listing the PPE requirements to enter a cyanide facility has been installed at appropriate locations.

The nine HCN fixed monitors located throughout the different process facilities are calibrated every 14 days as part of the preventive maintenance program and according to the manufacturer requirements. According to the Gas Monitoring procedure, fixed monitors must be controlled biweekly with gas pattern. In addition, Cerro Negro uses a third party contractor to conduct annual calibration of the I-Trans fixed HCN monitors with tests conducted every three months, as required by the manufacturer. Calibration certificates and records for 2017,

2018 and 2019 were reviewed and found to be complete. HCN handheld monitors are calibrated every 24 hours through a bump gas test with an automatic system that controls all parameters.

Warning signs are posted in all areas where cyanide is present advising workers that cyanide is in use, indicating that smoking, open flames and eating and drinking are not allowed, and that, if required, suitable personal protective equipment must be worn. The signs are in Spanish, which is the language of the workforce. The PPE requirements are also posted in each area. Verification was through visual inspection of the signs located in areas where cyanide solution is mixed and used. These areas include cyanide storage, preparation and the process plant.

Cerro Negro has been using a red colorant dye since June 2017 on high strength cyanide solutions, which meets this new requirement of the Code.

Cerro Negro has installed showers, eye wash stations and non-acidic fire extinguishers at strategic locations throughout the operation in all areas where there is a potential for exposure to cyanide. Showers and eye wash stations are inspected and tested every shift (twice a day) and prior to beginning a task that has the potential for cyanide exposure (e.g. cyanide mixing, opening a pipeline for maintenance, others). The auditors randomly checked showers and eye wash stations during the site tour to verify functionality. Fire extinguishers are inspected and tested monthly. In addition, maintenance and recharge of the fire extinguishers is conducted annually or as needed. During the sodium cyanide mixing process, operators were observed checking the condition and operation of safety showers and eye wash stations prior to commencing a cyanide mix.

Cerro Negro has identified all tanks and pipes that contain cyanide solution to alert workers of their contents. Pipes containing cyanide are marked as containing cyanide solution and flow direction is indicated. Cyanide storage and process tanks are marked as containing cyanide. Signages of confined spaces are also placed on cyanide tanks. Verification was by visual inspection. The auditors followed the cyanide solution circuit from the cyanide mixing area, the process plant area and pipelines transporting tailings to the tailings storage facility.

Cerro Negro has available Safety Data Sheets (SDS) and first aid procedures in areas where cyanide is managed, including cyanide storage area, mixing areas, the control room and in areas at the plants where cyanide is used. Safety Data Sheets (SDS) and first aid procedures are provided in Spanish, the language of the workforce. Sodium Cyanide Safety Data Sheet are also available in medical first aid kits and at the medical clinic; and is referenced in the operational procedure for Cyanide Emergencies, that is part of the Emergency Response Plan (ERP). First aid procedures for cyanide are available in each cyanide first aid kit and on signs located in areas where reagent grade cyanide is in use. Verification was through visual inspection of the first aid procedures and SDSs.

Cerro Negro has implemented the procedure Incident Investigation to investigate and evaluate all accidents and incidents, including cyanide related incidents, to determine the need for

changes to a process or procedure. The procedure was reviewed by the auditors and was found to be adequate and comprehensive.

During the recertification period, Cerro Negro did not have any cyanide incident with workers. There was one incident related to a small release of tailings containing cyanide in the tailings pipeline in October 2018. The incident was thoroughly investigated and an action plan was developed. The auditors reviewed the flash report and the investigation report. The auditors also verified that all actions identified in the action plan have been closed out.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 6.3 requiring development and implementation of emergency response plans and procedures to respond to worker exposure to cyanide.

Cerro Negro has made available necessary safety equipment including cyanide antidote kits, fresh water, oxygen, resuscitators, radios, telephones, and alarm systems in the cyanide storage, cyanide preparation area, process plant area, and at the clinic. The kits consisting of amyl nitrite ampoules with expiry date information are located within small refrigerators with incorporated thermometers to ensure that the ampoules are stored within a regulated temperature range between 36° and 46°F. Antidote kits are stored at two locations: At the control room and at the cyanide storage area. The kits consist of amyl nitrate, water and oxygen.

Cerro Negro regularly checks the cyanide emergency response equipment to ensure it is available when required. This includes inspections of cyanide antidote kits (amyl nitrite), first aid stations and kits, eye wash stations and emergency showers. Inspections include checks of expiration dates of cyanide antidote kits. Medical personnel periodically inspect the sodium thiosulfate and hydroxicobalamin antidotes.

Cerro Negro has developed and implemented a specific written procedure called Intoxication with Hydrogen Cyanide (HCN) to respond to cyanide exposures. This procedure describes the steps to be followed in the event of a cyanide exposure including personnel responsibilities, intoxication levels, first aid procedure, medical attention, derivation to the clinic and treatment. The procedure includes specific instructions for treatment of victims who are exposed to sodium cyanide via inhalation, ingestion, and dermal routes, as well as specific steps to be taken for conscious versus unconscious victims. In addition, Cerro Negro has an Emergency Response

Plan – ERP and a specific procedure for Cyanide Emergencies that include response procedures for cyanide exposures and releases.

Cerro Negro has its own onsite capability to provide first aid and medical assistance to workers exposed to cyanide including 3 ambulances, defibrillators, oxygen, stretchers and splint, among other medical devices. There is an ambulance in the medical clinic that will be the first choice for transporting a patient to an off-site medical facility, if required. There is an onsite clinic located nearby the process plant which operates 24 hours in a 12-hours shift, with 4 doctors in total that are available in shifts, 14 nurses and 50 emergency response members distributed in 2 shifts, which names and contact information are referenced in the ERP.

Cerro Negro has developed and implemented the procedure Onsite Medical Attention and Transfer to Offsite Facilities to transport workers to off-site medical facilities for further treatment, if required, and considers medical cases of cyanide exposure. In the case of cyanide exposure, the victims would be transported via ambulance directly to any of the local hospitals: Las Heras, Pico Truncado, Caleta Olivia, and Comodoro Rivadavia. The closest one is Las Heras that is located 120 km from the mine site (approximately 3- hour drive). The ERP provides details on how to respond in case of cyanide emergencies and includes contact information for local hospitals.

Cerro Negro has made arrangements with hospitals to provide assistance to workers exposed to cyanide. The closest hospital to respond in case of cyanide exposure is Las Heras (120 km away) followed by Pico Truncado, Caleta Olivia, and Comodoro Rivadavia. The Perito Moreno Hospital is located only 80 km away; however, Cerro Negro decided not to use this hospital for patients intoxicated with cyanide, as it does not have the required medical response equipment. During 2018 and 2019, Cerro Negro continued with the implementation of the Cyanide Route program, which consist in a series of workshops and training sessions related to cyanide emergencies with communities located along the cyanide transportation route. Personnel from hospitals, local fire departments and police stations participated in these training sessions. Cerro Negro has determined that the hospitals equipment is adequate and has qualified medical physicians to respond to cyanide exposures.

Cerro Negro conducts monthly mock emergency drills. At least two drills per year are related to cyanide and are based on likely cyanide release/exposure scenarios to test the response procedures, and incorporate lessons learned from the drills into its response planning. A debrief is conducted after each drill to identify lessons learned from the drills and corrective actions to be taken.

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

Standards of Practice

7.1 Prepare detailed emergency response plans for potential cyanide releases.

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

Describe the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 7.1 requiring preparation of detailed emergency response plans for potential cyanide releases.

Cerro Negro maintains an Emergency Response Plan (ERP) (PLN.EMER.CN.001) to address accidental releases, including cyanide. The ERP describes in general terms roles and responsibilities, activities before, during and after an emergency, activation of the emergency, emergency scenarios including spills of hazardous materials, muster points, evacuation plans and mock drills. As a complement to the ERP, Cerro Negro has developed and implemented procedures to respond to cyanide related incidents including a General Procedure for Emergency Response at the Process Plant; ERM (Mining Response Team) Call out; Operational Procedure for Emergencies with Cyanide; Operational Procedures for Mock Drills; Inspection of equipment and tools; Response to Hazardous Substances spills; Crisis Management, among others.

The ERP and supporting procedures for emergency response to cyanide incidents provide response procedures for all potential cyanide failure scenarios required by the ICMC verification protocol for mining operations. These include: catastrophic release of hydrogen cyanide; transportation accidents; releases during unloading and mixing; releases during fires and explosions; valve, pipe or tank ruptures; overtopping of ponds and impoundments; power outages and pump failures; uncontrolled seepage; failure of the cyanide destruction process; and, failure of tailings impoundments. Specific emergency response scenarios considered include medical emergencies, exposure to cyanide, evacuation of victims, cyanide releases (solid, liquid, gases), cyanides releases to surface water, among others.

Newmont works together with its ICMC certified cyanide supplier Orica to ensure that all transportation related emergencies are considered and that emergency response plans for such incidents are on file and up-to-date. In addition to Cerro Negro emergency response team, Orica provides emergency response assistance for all of its shipments. Orica has detailed emergency response plans that apply to the cyanide delivery to Cerro Negro. The transporter and ultimately Orica have responsibility for addressing any off-site incident. Incidents involving off-site and/or transportation of cyanide to Cerro Negro would be called into the Orica Hotline. Orica would then send a team of specialists and/or responders to the scene, as necessary.

Cerro Negro ERP and supporting procedures describe appropriate actions to be taken in the event of a cyanide spill. These documents specifically address treatment procedures for personnel who may have been exposed to cyanide and procedures for evacuation of the mine. The ERP defines team member responsibilities, communication procedures for notifying outside emergency response resources, government agencies, the community, other stakeholders and the media.

7.2 Involve site personnel and stakeholders in the planning process.

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

Describe the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 7.2 that requires to involve site personnel and stakeholders in the emergency response planning process.

Cerro Negro involves its workforce, stakeholders and communities along the cyanide transportation route in cyanide emergency response planning. The ERP does not assign a specific role to external responders in cyanide related emergencies. The ERP includes in section 3.12 that external responders (police, fire department and medical services) would be called only if Cerro Negro's internal response capacity is surpassed. Employees and contractors at Cerro Negro receive cyanide emergency response training depending on their roles and responsibilities. During these training sessions and through daily meetings, the workforce has the opportunity to provide feedback in emergency response planning.

Cerro Negro continued involving its stakeholders and communities along the transportation route in cyanide emergency response planning, as part of the Cyanide Route program. Although Cerro Negro ERP does not consider the active participation of outside responders or communities in case of on-site cyanide-related emergencies, external stakeholders including hospitals, local fire departments, police, and communities were engaged and received training related to cyanide emergency response during the recertification period. The program continues to be implemented every year through workshops with the communities located along the cyanide transportation route. Cerro Negro has made arrangements with hospitals to provide assistance to workers exposed to cyanide. The closest hospital to respond in case of cyanide exposure is Las Heras (120 km away) followed by Pico Truncado, Caleta Olivia, and Comodoro Rivadavia.

Cerro Negro ERP does not designate any specific responsibilities to outside responders and communities. Regardless of that, Cerro Negro has continued involving external stakeholders. Cerro Negro is in regular communication and consultation with its workforce and outside responders to keep the Emergency Response Plan current. Cerro Negro maintains close communications with Orica and Cruz del Sur, the cyanide provider and transporter respectively, and with local communities to ensure that emergency planning information is maintained and is current. The operation keeps a stakeholder contact information list in its ERP including cyanide supplier Orica, Civil Protection, outside medical facilities, police and fire departments. Cerro Negro also communicates with its workforce to keep the emergency response procedures current.

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

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

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Describe the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 7.3 requiring designation of appropriate personnel and commit necessary equipment and resources for emergency response.

The ERP describes the responsibilities and level of authority of the Emergency Response Chief and Leaders before, during, and after an emergency, and also includes responsibilities of the General Manager, Managers, Superintendents, supervisors, workers, communications team, evacuation team, mining rescue team, medical services, crisis committee and external services. The plan also includes procedures for alternate emergency response leader.

The Mine Rescue Team (ERM) is identified as part of the procedure ERM Call Out and referenced in the ERP. There is an updated list of team members including their names, shift, the areas where they work and contact information. Cerro Negro has 2 ERM shifts, with a total of 50 personnel. Cerro Negro continued implementing a training plan for their emergency responders. The plan includes the training required by level of response including first aid, rescue and HAZMAT.

Procedure ERM Call out includes call-out procedures and updated 24-hour contact information for the ERM team members, which is referenced in the ERP. The list of ERM members includes their names, shift, the areas where they work and contact information.

Procedure Inspection of equipment and tools includes detailed lists of the emergency response equipment located at the process plant, and at the two mine operations. These lists include emergency equipment for the process areas, the medical clinic, ambulances, cyanide antidote kits, HCN monitors, shower and eye wash stations, SCBAs (Self Contained Breathing Apparatus), chemical protective suits, spill recovery equipment, extinguishers, among others. Process personnel, ERM members and the medical staff inspect all emergency equipment and supplies on a weekly or biweekly basis.

The ERP does not assign a specific role to external responders in cyanide related emergencies. The ERP includes in section 3.12 that external responders (police, fire department and medical services) would be called only if Cerro Negro's internal response capacity is surpassed. The ERM Leader, who is responsible to lead the emergency, will determine the role of the external emergency responders. The scope of work for external responders is limited to the "cold area", until the area is secured and the leader of the ERM authorizes their involvement.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 7.4

Describe the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 7.4 requiring development of procedures for internal and external emergency notification and reporting.

The ERP provides on-site and off-site emergency response contact procedures in Appendix A - Emergency Response Role, which shows the communications flow chart for emergency situations. Appendix B - External Emergency Contact Numbers provide information of external responders, including regulatory agencies, fire departments, police, local medical facilities and Civil Protection. Appendix C - Newmont Emergency Contact Numbers provides information of internal responders.

Although the nearest community (Perito Moreno) is located approximately 80 km from the mine operations, the ERP includes in Section 3.6 - Communications Team, the requirement to notify local communities and regulatory entities of emergency situations, if necessary. In addition, the procedure Crisis Management clearly defines roles and responsibilities, as well as required actions and the communications protocol to inform internal and external stakeholders, including the media, of significant emergency situations.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 7.5 requiring incorporation into response plans monitoring elements and remediation measures that account for the additional hazards of using cyanide treatment chemicals.

Section 6.2 of the procedure Response to Hazardous Substances addresses recovery and neutralization of liquid and solid cyanide spills. The procedure requires specific actions depending on the magnitude of the spill: minor, moderate or catastrophic. For moderate spills the procedure indicates to neutralize with sodium/calcium hypochlorite and then proceed to recover the spilled and contaminated materials and dispose them according to the Waste

Management procedure. For liquid spills, the solution will be pumped into suitable containers and disposed of according to the Waste Management procedure. In addition, Section 6.7 of the Operating Procedure for Cyanide Emergencies describes specific actions for different cyanide spills scenarios including solid cyanide and cyanide solution spills in dry and wet soils, among others. The sodium hypochlorite for neutralization purposes is stored in the HAZMAT trailer in a pre-mixed 8% concentration solution.

Procedure Response to Hazardous Substances spills includes procedures to neutralize contaminated soils as necessary with hypochlorite solution. Section 6.2.4 indicates the final cyanide concentration allowed in residual soil as evidence that the release has been completely cleaned up. In addition, the procedure indicates that cyanide spill clean-up materials and debris are coded as Y-33 (according to Argentinian regulations) and should be disposed of in an external secured landfill.

It is unlikely that the operation can adversely impact drinking water supplies for Perito Moreno community (80 km away from the site) due to an uncontrolled seepage of process facilities or groundwater contamination.

Section 6.5 of the Operating Procedure for Cyanide Emergencies clearly states that use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide are prohibited in case of cyanide releases to surface waters, as they can severely impact aquatic life.

Procedure Response to Hazardous Substances spills requires in section 6.2.4 that contaminated water and/or soils are monitored as necessary after a cyanide spill. The document describes procedures for soil sampling including methodologies, parameters and the final cyanide concentration that will be allowed in residual soils as evidence that the spill has been completely cleaned up.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 7.6 requiring periodic evaluation of response procedures and capabilities and revise them as needed

As stated in section 3.5 of the ERP, the plan is reviewed every 6 months and updated as required to ensure that information is kept up-to-date and that the plan remains appropriate for the process facilities. The plan will also be reviewed following a mock drill or incident, as needed.

Cerro Negro conducts monthly mock emergency drills according to an annual mock drill plan included in the operational procedure for Mock Drills. At least two drills per year are related to cyanide and are based on likely cyanide release/exposure scenarios to test the response procedures, and incorporate lessons learned from the drills into its response planning.

Drills are developed to include a variety of locations and scenarios including environmental release and exposure responses. Internal observers are included in the drill to evaluate the response. Cerro Negro evaluates the mock drills and identifies corrective actions. Corrective actions are uploaded in Enablon where they are tracked until closed. A debrief is conducted after each drill to identify lessons learned from the drills and corrective actions to be taken. Auditors reviewed the mock drill reports and supporting documentation to verify that action items identified from the mock drills have been closed. Records were available to demonstrate that emergency response drills were conducted during the last three years. The operational procedure for Mock Drills requires that each drill is critiqued for deficiencies and corrective action is taken. The ERP is updated as necessary after emergency response incidents or emergency drills.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 8.1 requiring training workers to understand the hazards associated with cyanide use.

Personnel who may work with cyanide receive training in cyanide-related hazard topics. Both internal and external personnel conduct training. Cerro Negro has developed and implemented three modules for personnel that may work with cyanide including induction training for all workers (Module1), specific training for people who work directly with cyanide operations (Module 2), and training for emergency response personnel (Module 3). In addition to the general training, all employees working in process areas are required to undergo task specific training.

Cerro Negro has a procedure and plan for the safe management of Cyanide according to ICMI requirements. There is no specific training program for Modules 1, 2 and 3. Training in each of these modules is provided as required by the operation.

Cerro Negro requires employees to have biannual refresher trainings in Module 1 (Cyanide awareness) and Module 2 (Cyanide Management) for personnel working with cyanide. Refresher sessions on Module 3 (Emergency Response) for emergency response personnel are conducted as required (usually every two years). In addition, personnel working in process areas also receive refreshers on the procedures, or when there have been changes to the procedures.

The auditors reviewed training records for workers interviewed during the field audit. The records identify the trainer, trainee, topics covered, date and sign off sheet.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 8.2 requiring training appropriate personnel to operate cyanide facilities according to systems and procedures that protect human health, the community and the environment.

Formal training in working procedures was reviewed for all cyanide-related tasks including cyanide unloading, mixing, production and maintenance. Individual training is provided for each specific cyanide management related task that an operator will perform and includes cyanide task procedures as needed.

Cerro Negro has developed a list of training needs related to cyanide management for each job position according to their responsibilities. Auditors reviewed examples of training records covering the audit recertification period related to loading and unloading of cyanide boxes, cyanide preparation, rinsing of cyanide bags; decontamination of cyanide piping and equipment, mill procedures, use of HCN monitors, flotation, instrumentation and process control.

In addition to general training (Module 1 and 2), all employees working in process areas are required to undergo task specific training. These procedures define the steps required to complete a task and the procedure itself is used as training material. These work procedures include the objective of the procedures, responsibilities, required PPE, decontamination requirements, risks associated with the cyanide task, and the individual task specific steps.

Task specific training to operators is provided by process supervisors and process chiefs who have several years of experience in the different process areas. Supervisors are considered qualified to provide training based on their experience. Cyanide specific training under Module 2 is provided by ERM members, doctors from the mine medical services and process

supervisors that received “Cyanide Management Train-the-Trainer” training provided by HAZMAT Argentina. Module 3 is provided by external specialists HAZMAT Argentina and Ciquime.

All personnel in job positions that involve the use of cyanide and cyanide management receive training on how to perform their assigned tasks with minimum risk to themselves and their colleagues. Employees that will be working with cyanide receive a classroom training session (Module 2) that covers the Cyanide Code, procedures for safe use of cyanide, treatment of patients intoxicated with cyanide, and response to cyanide emergencies. A senior/junior on-the-job training approach is used to further train personnel on job activities and cyanide safety.

Cerro Negro requires employees to have biannual refresher trainings in Module 1 (Cyanide awareness) and Module 2 (Cyanide Management) for personnel working with cyanide. Refresher sessions on Module 3 (Emergency Response) for emergency response personnel are conducted as required (usually every two years). In addition, personnel working in process areas also receive refreshers on the procedures, or when there have been changes to the procedures (this is usually done through daily meetings). HAZMAT Argentina and Ciquime also provide external training on a regular basis.

Cerro Negro evaluates the effectiveness of cyanide training by written testing and on-the-job observation. Cerro Negro requires written tests to evaluate the effectiveness of cyanide training. Following classroom training, an employee is first supervised in all activities. The supervisor will determine when that individual is then able to perform the task on his/her own.

Training records are retained throughout employment history. The records identify the trainer, trainee, topics covered, date and sign off sheet. The results of the testing are also maintained as part of the files. Written tests are completed to demonstrate the employees understanding of the training materials.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 8.3 requiring training appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

Cyanide unloading, mixing, production and maintenance personnel are trained in the procedures to be followed if cyanide is released. The requirements of operational procedures including emergency response procedures are covered in Module 2 training that includes

topics such as oxygen therapy, treatment and first aid to intoxicated patients, and emergency response. Cerro Negro provides training to ERM team member three times a week, where some of the topics covered include decontamination of equipment and soil, and cyanide spill response. In addition, external training is also provided by HAZMAT Argentina and Ciquime on a regular basis.

Employees working with cyanide receive specific training in the operational procedure for Cyanide Emergencies, and response to spills including neutralization, decontamination, first aid, amyl nitrite and oxygen dosing.

Personnel who work in areas where cyanide is present receive training in decontamination and first aid procedures. These personnel include unloading, mixing, and production operators, as well as maintenance workers. Module 2 training includes details on how to respond to cyanide related emergency in case of inhalation, ingestion or skin contact with cyanide. In addition, employees working with cyanide receive specific training in the operational procedure for Cyanide Emergencies, and response to spills including neutralization, decontamination, first aid, amyl nitrite and oxygen dosing. ERM team members receive training three times a week, where some of the topics covered include decontamination of equipment and soil and cyanide spill response. In addition, HAZMAT Argentina and Ciquime also provide external training on a regular basis.

Mock emergency drills related to cyanide incidents are conducted twice a year with participation of the doctors, nurses and ERM members that includes personnel from process and maintenance areas. Scenarios considered in these drills include events with cyanide intoxication as well as cyanide releases.

Emergency response team members (ERM) are trained through participation in mock emergency drills as well as via internal and external training programs. Formal emergency response teams are in place for fire, first aid, spill, and evacuation. ERM personnel are available on all shifts.

Cerro Negro continued involving its stakeholders and communities along the transportation route in cyanide emergency response planning, as part of the Cyanide Route program. Although Cerro Negro ERP does not consider the active participation of outside responders or communities in case of on-site cyanide-related emergencies, external stakeholders including hospitals, local fire departments, police, and communities were engaged and receive training related to cyanide emergency response during the recertification period.

Cerro Negro requires employees to have biannual refresher trainings in Module 1 (Cyanide awareness) and Module 2 (Cyanide Management) for personnel working with cyanide. Refresher sessions on Module 3 (Emergency Response) for emergency response personnel are conducted as required (usually every two years). Written testing is performed and confirmation of skill is done via on-the-job observation.

Cerro Negro conducts monthly mock emergency drills according to an annual mock drill plan included in the operational procedure for Mock Drills. At least two drills per year are related to

cyanide and are based on likely cyanide release/exposure scenarios to test the response procedures, and incorporate lessons learned from the drills into its response planning. Cerro Negro evaluates the mock drills and identifies corrective actions. Corrective actions are uploaded in Enablon where they are tracked until closed. A debrief is conducted after each drill to identify lessons learned from the drills and corrective actions to be taken

Training records are retained throughout employment history. The records identify the trainer, trainee, topics covered, date and sign off sheet. The results of the testing are also maintained as part of the files. Written tests are completed to demonstrate the employees understanding of the training materials.

9. DIALOGUE: Engage in public consultation and disclosure.

Standards of Practice

9.1 Provide stakeholders the opportunity to communicate issues of concern.

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

Describe the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 9.1 that requires providing stakeholders the opportunity to communicate issues of concern.

Cerro Negro provides the opportunity for stakeholders to communicate issues of concerns through frequent dialogue and engagement with communities of the influence area.

Cerro Negro has a community attention system (i.e. complaint and grievance mechanism) where communities can raise concerns related to mining activities, including issues related to cyanide management in the operations. No concerns related to cyanide management were received during the recertification period.

Cerro Negro continued conducting tours to mining facilities for schools, universities and adults of surrounding communities. This program started in 2016 and runs from September to April each year. The tours include information related to cyanide management (Module 1) and provide an opportunity for visitors to ask questions and raise concerns. A brochure related to key questions and answers about cyanide management is also distributed to visitors as part of the program.

Cerro Negro also participates in many public relations and economic development forums and events where stakeholders can have the opportunity to communicate issues of concern regarding cyanide management.

Cerro Negro continued conducting informative workshops as part of the Cyanide Route program. External stakeholders including hospitals, local fire departments, police, and communities were engaged and receive training related to cyanide emergency response during the recertification period. During the recertification period, the Cyanide Route program has covered the following communities: Rio Gallegos, Piedra Buena, Puerto Santa Cruz, Puerto San Julian, Puerto Deseado and Fitz Roy.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 9.2 that requires initiation of dialogue describing cyanide management procedures and responsively address identified concerns.

Cerro Negro utilizes the same mechanisms described in 9.1 as opportunities to interact with stakeholders and provide them with information regarding cyanide management practices and procedures. These opportunities include mine tours, the Cyanide Route program, the complaints and grievance system, the community office in Perito Moreno, participation in public relations and economic development forums and events, and direct interaction and engagement with community members.

The cyanide brochure is available to internal and external stakeholders including relevant information related to proper cyanide management. The Newmont website also provides information related to the Cyanide Code and requirements for the safe management of cyanide.

In 2019 Cerro Negro launched a “Learning at Work” program that consists in having young adults (18 -25 years old) work at the mine for 3 months in 14 day shifts where communication about cyanide management was a key aspect of the program.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 9.3

Describe the basis for the Finding/Deficiencies Identified:

Cerro Negro is in FULL COMPLIANCE with Standard Practice 9.3 that requires making available to stakeholders appropriate operational and environmental information regarding cyanide

Cerro Negro has developed a presentation that is used for the Cyanide Route program that is presented to communities along the transportation route. The purpose of the program is to provide information on cyanide management procedures related to the environment and safety. The workshop presentation includes topics like introduction to the Cyanide Code, cyanide characteristics, safety practices, uses of cyanide, transportation practices and the cyanide transportation route.

Cerro Negro has developed a Cyanide management brochure including key questions and answers about cyanide management. This brochure is distributed to workers, contractors, communities and visitors and is also distributed during public relation fairs and at the community office in Perito Moreno.

Information is disseminated in verbal form during Cerro Negro community meetings, and during the mine tours program. Most of the people from the communities located around the mine speak and write in Spanish.

There has been no cyanide exposures have occurred at the Cerro Negro since the start of operations

In the last 3 years there has been no cyanide releases on or off the mine site resulting in significant adverse effects to the environment; no cyanide releases off the mine site requiring response or remediation, no cyanide releases that are or that cause applicable limits for cyanide to be exceeded and no on or off-site cyanide releases that would require reporting under applicable regulations since the start of operations. Cerro Negro is required to report any cyanide exposure and release incidents to the relevant provincial authorities. Any significant incidents would be publicly reported in the annual Corporate Social Responsibility Report.