



Submitted to:

International Cyanide Management
Institute (ICMI)

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United States of America

and:

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ICMC CERTIFICATION SUMMARY AUDIT REPORT

Nevada Gold Mines – Long Canyon Mine

8 October 2024

Project No: 0717142



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Signature Page

8 October 2024

ICMC Certification Summary Audit Report

Nevada Gold Mines LLC – Long Canyon Mine



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1. INTRODUCTION

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

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

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

This summary report has been prepared to meet the requirements and intentions of the International Cyanide Management Institute (ICMI) to demonstrate that following named project has met the obligations in implementing the International Cyanide Management Code (Code).

Name of Mine: Long Canyon Mine

Mine Owner: Nevada Gold Mines LLC

Mine Operator: Nevada Gold Mines LLC

Name of Responsible Manager: Joel Donalson, General Manager

Address and Contact Information: Nevada Gold Mines LLC
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Audit Company: ERM, Inc.

Audit Team:

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Email: taylor.dillon@erm.com

Date of Audit: The Recertification Audit was undertaken over remote sessions and a one day site visit on May 29, 2024.



2. ATTESTATION

Auditors Findings and Attestation:

in full compliance with
Long Canyon Mine is in substantial compliance with **International Cyanide Management Code**
 not in compliance with

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

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, as 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 Auditors.

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

<u>Long Canyon Mine</u>	<u></u>	<u>8 October 2024</u>
Name of Facility	Signature of Lead Auditor	Date

3. BACKGROUND ON OPERATIONS

The Long Canyon Mine (LCM) is located in northeastern Elko County, Nevada approximately 27 miles east of Wells, Nevada, and approximately 31 miles west of Wendover, Nevada (see Figure 1 for a regional map). The site is accessed via Interstate 80 (I-80) Oasis/Montello Exit (Exit 378). The LCM currently consists of an open pit, heap leach facility, carbon-in-column (CIC) facility, waste rock storage facility, truck shop, administration building, and other support facilities. The proposed total land disturbance area is approximately 3,875 acres of which 1,791 acres are located on public land and 2,084 acres are located on private land.

The LCM is currently in care and maintenance, so no mining is occurring in the open pit. LCM ceased mining operations on May 9, 2022. The site includes an open pit with a series of benches from which oxide waste rock and ore was previously extracted. Prior to May 9, 2022, LCM used conventional open-pit, surface mining techniques and equipment including blast-hole drills, hydraulic shovels, front-end loaders, and off-highway haul trucks. Other related mining equipment included dozers, rubber-tired loaders, motor graders, water trucks and other mobile support equipment. The site is currently just operating the mineral processing circuit and no new ore is being placed onto the heap leach pad.

When LCM was actively mining, run of mine ore was loaded into haul trucks that transported the ore to the heap leach pad located northeast of the open pit, or a stockpile area located near the mine complex facilities for future processing. Waste rock was loaded and hauled to the waste rock storage facility located east-northeast of the open pit or may have been placed within mined out portions of the pit.

The mineral processing circuit comprises of those units that are used to hold, treat, process, or transfer minerals during normal and emergency operation of the facilities. The mineral processing circuit consists of the following components:

- Heap leach pad – Phases 1-3
- Process solution collection and conveyance pipelines
- Process Solution Pond
- Pregnant Solution Tank
- Carbon-in-Column Plant, including the cyanide storage tanks and unloading area

The ore was previously placed in lifts on the fully lined heap leach pad. Lifts range from 30 to 50 feet in height depending on topography and processing needs. A dozer with a ripper attachment rips the surface to facilitate percolation and minimize ponding of the process solution. A weak sodium cyanide solution is applied to the surface and side slopes of the stacked ore using emitters.

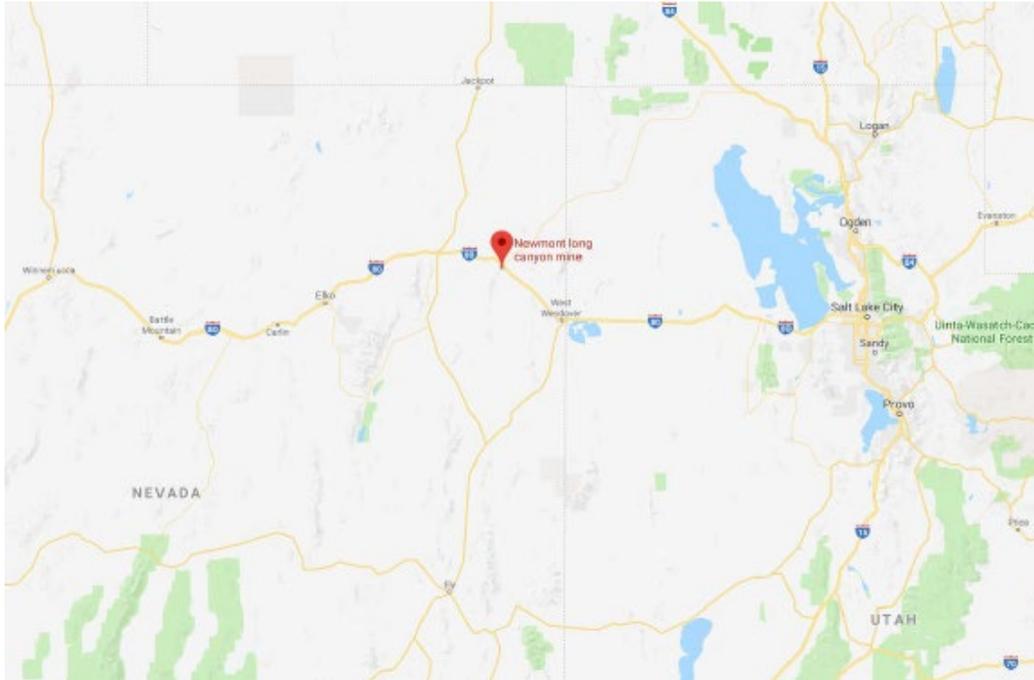
The sodium cyanide solution migrates downward through the stacked ore, leaches the gold contained in the ore, and flows in pipes to a Pregnant Solution Tank (PST) located down-gradient within the Process Solution Pond (PSP) footprint. The solution containing dissolved gold, known as “pregnant solution”, is pumped from the PST to a CIC recovery system located inside the CIC Plant building next to the PST. During or following an upset condition, the potential exists to overflow the PST. Solution overflow from the PST flows into the PSP. Solution in the PSP is transferred to the Barren Solution Tank (BST) located inside the CIC building via a manually operated pump.

In the CIC building, pregnant solution from the PST is pumped at 2,500 - 3,000 gallons per minute (gpm) through a series of six (6) columns where gold is adsorbed onto activated carbon. The pregnant solution enters Column 1 and cascades through the columns to Column 6, while the carbon is advanced from Column 6 to Column 1. From Column 1, the loaded carbon (carbon-containing gold) is consolidated and transported via tanker trucks to a refinery located at other Nevada Gold Mines LLC (NGM) facilities for final processing into doré. LCM does not conduct any refining.

The solution exiting the carbon columns (which is now essentially depleted of gold and referred to as ‘barren solution’) is piped to the BST located within the CIC building where sodium cyanide is added, if necessary, before the solution is pumped to the heap leach pad. During or following an upset condition, the potential exists to overflow the BST. Overflow solution flows into the PSP. The overflow level is managed inside the BST such that solution does not overflow the tank, but reports into an overflow partition inside the tank that then feeds into the PSP via a pipe. The heap leach pad and CIC Plant are continuous processes and are operated as a closed system (zero discharge) facility. Fresh water is added as needed to account for evaporation losses.

The following list identifies the cyanide facilities constructed or modified since the 2021 Recertification Audit.

- LCM added a bypass line from the CIC Plant Column 6 directly to the PSP to use as an overflow. The bypass line is a high-density polyethylene (HDPE) pipe and allows LCM to properly dose cyanide to the barren solution that is being pumped to the heap leach pad while preventing the addition of cyanide to the overflow solution reporting to the PSP.
- LCM switched from using lime to caustic to control pH in the CIC Plant. A small temporary caustic addition area was added to the CIC Plant in May 2022. The caustic (50% sodium hydroxide) is contained in a tote that is located in secondary containment and is pumped into the process circuit at the BST. In February 2023, a 6,600-gallon caustic tank was installed and replaced the temporary tote. Similar to the tote, the larger caustic tank is located in the CIC Plant within existing containment.

Figure 1. Regional Map

LCM receives liquid sodium cyanide in specially engineered tanker trucks from Cyanco Company LLC (Cyanco) located in Winnemucca, Nevada. Sodium cyanide is delivered by TransWood. Both Cyanco and TransWood are signatories to the Code and have been certified as compliant with the Code by third-party auditors.

LCM stores and manages sodium cyanide in engineered tanks, pipelines, and a lined pond that have had appropriate quality control and quality assurance performed during construction. LCM workers are trained in cyanide hazards and first aid, first response, emergency response, and specific operational tasks. LCM's cyanide facilities are fenced to preclude wildlife and livestock from entering cyanide process areas. LCM conducts daily, weekly, and monthly inspections to ensure that facilities are functioning as designed and to monitor process solutions. Preventive maintenance programs are in place to assure continuous operations. LCM has approved closure and reclamation plans along with financial assurance to complete the appropriate management of cyanide solutions and solids, and the decontamination of cyanide pipelines and equipment.

The LCM operation was found to be in full compliance with the International Cyanide Management Code and this operation has not experienced compliance problems during the previous three-year audit cycle.

4. GOLD MINING VERIFICATION PROTOCOL

4.1 Principle 1 – Production and Purchase

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

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

FINDING:

The operation is in full compliance with Standard of Practice 1.1.

BASIS FOR FINDING:

The Long Canyon Mine (LCM) is in full compliance with Standard of Practice 1.1, requiring the operation to purchase cyanide from certified manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide and to prevent releases of cyanide to the environment.

LCM purchased sodium cyanide 30% (nominal) aqueous solution cyanide from Cyanco in Winnemucca during the 2024 Recertification Audit Period. The Master Supply Agreement between Cyanco and Nevada Gold Mines LLC (NGM) became effective on January 4, 2021 and has an end date of December 31, 2025.

The auditors reviewed a representative sample of Bills of Lading (BOLs) throughout the Recertification Audit Period to confirm that LCM purchased the sodium cyanide solely from Cyanco's Winnemucca cyanide production facility. Cyanco originally became a signatory to the Code November 3, 2005 and was recertified January 13, 2023.



4.2 Principle 2 – Transportation

Protect Communities and the Environment during Cyanide Transport

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

FINDING:

The operation is in full compliance with Standard of Practice 2.1.

BASIS FOR FINDING:

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

LCM maintains the BOLS for sodium cyanide delivered. The BOLS confirm that only TransWood Inc. transported sodium cyanide to LCM from Cyanco's Winnemucca, Nevada cyanide production facility. TransWood Inc. originally became a signatory to the Code June 22, 2006 and was recertified November 30, 2022.



4.3 Principle 3 – Handling and Storage

Protect Workers and the Environment during Cyanide Handling and Storage

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

FINDING:

The operation is in full compliance with Standard of Practice 3.1.

BASIS FOR FINDING:

LCM is in full compliance with Standard of Practice 3.1; design and construct unloading, storage and mixing facilities consistent with sound accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.

LCM has designed and constructed the sodium cyanide unloading and storage facilities in accordance with sound engineering practices as previously reported in Cyanide Code Audit Reports. Two vertical 10,000-gallon cyanide storage tanks are located outside the CIC building. No changes have been made to the unloading and storage facilities since the previous recertification audit.

To minimize human exposure during cyanide unloading and storage, cyanide unloading and storage facilities are located outside and within a secured area of the mine. The cyanide storage tanks are located within an area surrounded by an 8-foot high security fence and discharge valves on the cyanide piping and tanks are locked in the closed position. The larger mine site surrounding the fenced cyanide facilities is access-controlled by security fencing and a gatehouse to prevent unauthorized public access. LCM places signage during a cyanide offloading event to make employees aware. As indicated in the 2021 Recertification Audit report and confirmed by the site inspection, the cyanide offloading and storage area is located away from the offices and any areas where employees may congregate. LCM is in an arid region. The nearest surface water body to the cyanide unloading and storage facilities is the Johnson Springs Wetland Complex which contains North Springs (1.4 miles away) and Big Springs (2.7 miles away).

The cyanide unloading area is constructed of a concrete pad, which provides an adequate barrier to prevent seepage to the subsurface. The concrete pad at the unloading area was observed to be in good condition during the site inspection portion of the 2024 Recertification Audit.

Level indicators with alarms are located in the cyanide storage tanks to prevent overfilling. The level indicators are visually inspected monthly. In addition, the cyanide storage tanks are connected and operate in parallel; therefore, the level indicators on the tanks are redundant. If the level indicators are not reading the same, operations personnel will write a work order. The auditors observed tank levels at the storage tank areas and control room screens to verify the indicators were functioning.

The cyanide storage tanks are located within concrete secondary containment areas. The auditors observed the containment areas to be in good condition; thereby, preventing seepage to the subsurface.

The cyanide storage tanks are located outdoors to prevent the buildup of hydrogen cyanide (HCN). No incompatible materials, such as acids, oxidizers, and explosives, were stored in the cyanide storage tank containment areas.



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

FINDING:

The operation is in full compliance with Standard of Practice 3.2.

BASIS FOR FINDING:

LCM is in full compliance with Standard of Practice 3.2; operate unloading storage and mixing facilities using inspections, preventative maintenance, and contingency plans to prevent or contain releases and control and respond to worker exposures.

LCM only receives liquid sodium cyanide via tanker trucks. No solid cyanide is received at LCM. The TransWood delivery trucks are only on site for the duration of the unloading event. Once unloaded, tanker trucks leave the mine site. No empty cyanide containers were observed on site during the 2024 Recertification Audit.

The Cyanide Off-Loading Standard Operating Procedure (SOP) states that the TransWood driver is responsible to pressure test the system, which includes the lines, valves, and couplings, to ensure no leaks are present and performing a general inspection of the entire cyanide offload area. The workplace examination performed by the CIC Plant operator includes a review of the cyanide areas including hose, valves, and couplings. If a deficiency is observed during these checks, tests, or examinations, a workorder is created for maintenance to perform repairs. The delivery truck driver is responsible for inspecting and maintaining their cyanide delivery truck and equipment, including shut off valves and hoses. The CIC Plant operator and TransWood driver are required to both be present during the connection and disconnection of the unloading event. During the unloading of the cyanide, the TransWood driver stays present at the truck and NGM has cameras to observe the unloading event remotely. The SOP specifies the required personal protective equipment (PPE) that the cyanide delivery truck driver must be wearing during the unloading event. Based on review of the Cyanide Off-Loading SOP and on interviews with the TransWood driver, the TransWood driver is responsible for cleaning up any cyanide residue that is on the truck valves, hoses, and connections. When the offload is complete, the TransWood driver uses fresh water to rinse the valve area. The CIC Plant operator and TransWood driver complete a general inspection of the area after the disconnect takes place. In addition, Cyanide Off-Loading SOP requires that all cyanide spills, regardless of the source (e.g., cyanide unloading) are cleaned up as soon as it is safe to do so.

Cyanco adds red colorant dye to the liquid cyanide prior to shipping the cyanide. The auditors were unable to observe the color of the reagent-grade cyanide since the cyanide is added below the liquid level in the process tanks. Based on interviews with the LCM CIC Plant operator and the TransWood truck driver, personnel are aware that the higher strength cyanide solution delivered to LCM is dyed red.

To verify compliance with the offload procedures, the auditors observed a cyanide unloading event at the CIC Plant and interviewed a CIC Plant operator and TransWood delivery truck driver. Both demonstrated an understanding of the requirements, where to go for the emergency shut off, how to prevent and contain releases, and how to respond to a potential worker exposure.



4.4 Principle 4 – Operations

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

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

FINDING:

The operation is in full compliance with Standard of Practice 4.1.

BASIS FOR FINDING:

LCM is in full compliance with Standard of Practice 4.1; implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures.

LCM has developed and implemented written management and operating plans and manuals, checklists, and SOPs. SOPs cover the safe operation of the entire cyanide management system at LCM. The procedures include process descriptions, operating tasks, inspections, maintenance, and shutdown procedures. LCM's Water Pollution Control Permit (WPCP) authorizes the construction and stipulates operating requirements for LCM's cyanide facilities.

LCM's Cyanide Management Plan, WPCP, Fluid Management System Operating Plan, and SOPs identify the assumptions and parameters incorporated into the facility's design and identify the applicable regulatory requirements.

LCM does not have a tailings impoundment and does not discharge process water to surface water or groundwater. The plans and permits describe the monitoring requirements for the heap leach pad operations, surface water, and groundwater.

LCM has developed and implemented inspection and preventive maintenance (PM) programs that include practices for safe and environmentally sound operation of their cyanide facilities. LCM uses a computer-based system for identifying, assigning responsibility, scheduling, and tracking the completion of the PM activities. The PM program includes elements necessary for cyanide safety (i.e., HCN monitors, pH probes, cyanide pumps, back-up generators, storage tanks, and others).

LCM follows the Barrick corporate Management of Change (MOC) Procedure for reviewing proposed process and operational changes and modifications to existing facilities. LCM utilizes a system to evaluate changes to processes, materials, equipment, systems, programs, and resources for potential hazards to worker health and safety and the environment and control or eliminate those hazards prior to implementing the change. The auditors reviewed a representative sampling of MOC documentation.

LCM has incorporated contingency procedures into various standard operating procedures and management plans at the operation. In addition to these operating procedures, interlocks are in place to help control the adverse effects from upset conditions.

Operations, maintenance, and environmental personnel conduct routine inspections of the heap leach facility, CIC Plant, pipelines, Process Solution Pond, and leak detection systems. These inspections are documented on hard copy forms or reports that include space for personnel to note deficiencies or problems observed during the inspection. The Process Solution Pond is inspected to ensure the freeboard requirement is met. The auditors reviewed a representative sampling of completed inspection records for the recertification period and they demonstrate that inspections were completed as scheduled and ensure that the cyanide facilities are operated in



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

a safe and environmentally sound manner. In addition, the auditors observed that LCM inspects its cyanide facilities on an established frequency that is sufficient to ensure and document that they are functioning within design parameters.

Operations personnel conduct daily visual inspections of tanks for signs of corrosion and leakage and maintenance personnel perform ultrasonic wall thickness testing of the cyanide storage tanks on an annual basis.

Secondary concrete containment areas are inspected each shift by operations personnel and monthly by maintenance personnel for integrity, salt build up, cracking, and presence of fluids. Secondary containments were observed during the audit as being in good condition and drains on cyanide storage tanks and piping were either blind-flanged or equipped with valves locked in the closed position. Secondary containment areas are not equipped with drains.

LCM has an emergency power generator dedicated solely to the operation of the CIC Plant and heap leach operations in the event of a power outage.

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

FINDING:

The operation is in full compliance with Standard of Practice 4.2.

BASIS FOR FINDING:

LCM is in full compliance with Standard of Practice 4.2; introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

LCM does not have a mill.

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

FINDING:

The operation is in full compliance with Standard of Practice 4.3.

BASIS FOR FINDING:

LCM is in full compliance with Standard of Practice 4.3; implement a comprehensive water management program to protect against unintentional releases.

For the recertification period, LCM used an Excel-based water balance model. The data entered into the water balance model comes from Wonderware. The water balance model is updated monthly. The water balance model is both comprehensive and probabilistic. It is comprehensive in that it includes the appropriate facilities and processes, including the heap leach pad, pregnant solution tank, CIC Columns, and barren solution tank. Inflows to the model include make up water and direct precipitation. Since the heap leach pad and Process Solution Pond are configured as elevated features surrounded by diversion ditches, run-on is not an inflow. The model is also probabilistic in that inputs, including precipitation data, can be varied as needed to project different outcomes. Precipitation data can be varied to simulate different precipitation events along with extreme and seasonal variations, such as prolonged drought. LCM's Fluid Management System Operating Plan specifies inspection and monitoring activities associated with implementation of LCM's water balance. SOPs also address ponding on the heap leach pad and operation of the leak detection systems.



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

LCM uses the 100-year, 24-hour storm event to forecast water management requirements. LCM maintains a site weather station. The data from the onsite weather station is used in the water balance model.

LCM has configured the heap leach pad with engineered diversion structures so that stormwater runoff from the upgradient areas is diverted around the heap leach pad. Therefore, stormwater runoff from upgradient watersheds is not included in the water balance model. The LCM water balance does not specifically evaluate the effects of potential freezing and thawing build up and release since the heap leach pad does not accumulate large quantities of snow that melts at the same time. Solution losses due to evaporation and water uptake in the ore that is placed on the heap leach pad, when ore was added to the pad in the past, are included in the water balance model. The heap leach pad and associated ponds are operated as zero discharge facilities; therefore, the water balance model does not include seepage to the subsurface or discharges to surface water since LCM does not discharge process solutions.

The Process Solution Pond was designed with adequate freeboard above operating levels to contain the design storm event (100-year/24-hour storm event). LCM operates the Process Solution Pond empty except for emergency conditions, which provides sufficient capacity to contain the flows from the design storm event and maintain the two-foot freeboard requirement in LCM's WPCP.

Based on review of the precipitation data and discussions with LCM personnel, LCM is located in an arid region and has generally low monthly and quarterly rainfall totals. Auditors reviewed samples of the onsite weather station results to confirm the low monthly and quarterly precipitation results. With such consistent low levels of precipitation, the water balance model has not indicated the need to revise design assumptions or operating practices.

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

FINDING:

The operation is in full compliance with Standard of Practice 4.4.

BASIS FOR FINDING:

LCM is in full compliance with Standard of Practice 4.4; implement measures to protect birds, other wildlife, and livestock from adverse effects of cyanide process solutions.

LCM has implemented operational controls to ensure that wildlife, birds, and livestock do not access open waters where weak acid dissociable (WAD) cyanide concentration exceeds 50 mg/l. Open waters at LCM include any liquids (process solution or stormwater) that may be present in the Process Solution Pond and ponding on the heap leach pad. LCM has implemented a number of measures to protect birds, other wildlife and livestock including:

- Entire heap leach pad and CIC Plant is surrounded by an 8-foot fence with tighter mesh on the lower 4 feet to minimize access by smaller wildlife.
 - Pregnant and barren solutions are transferred in pipelines between the CIC Plant and the heap leach pad so that no open waters are present in ditches and the ditches are filled with gravel.
 - Heap leach operators inspect the pad each shift and implement corrective actions immediately if ponding is observed and follow SOPs to prevent ponding as much as possible.
-



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

- The Long Canyon Fluid Management System Operating Plan states that the PSP will be operated in a manner that minimizes standing solution at any given time and outlines the steps to be taken to minimize the cyanide concentration in solution that overflows into the pond and for the removal of liquids from the pond.
- Bird-deterrent cannons and remote-controlled boats are used to chase birds away from the PSP when it does contain water.

LCM demonstrated that the WAD cyanide concentration in open waters in the PSP did not exceed 50 mg/L. LCM personnel are required to report all wildlife mortalities to LCM's Environmental Team. The Environmental Team submits a quarterly report to the Nevada Department of Wildlife (NDOW) that lists all wildlife mortalities and the suspected cause of death. A review of the quarterly wildlife reports submitted to NDOW during the Recertification Audit period showed that no wildlife mortalities related to cyanide occurred. LCM's efforts to maintain a WAD cyanide concentration of 50 mg/L or less in open waters has been effective in preventing wildlife mortalities.

LCM applies barren solution to the heap leach pad through a drip system. Barren solution travels to the heap leach pad through HDPE pipes. Drip lines are attached to the transfer pipe and then spread across the heap leach pad in parallel rows in those areas of active leaching. The cyanide solution drips out of the drip lines and soaks into the ore. LCM used sprinklers during the Recertification Audit period on the heap leach pad to apply barren solution to the inner portions of the heap leach pad, which prevented overspray of solution off the heap leach pad liner. Between applying the barren solution in this manner, implementing the Long Canyon Ponding Procedure, and performing inspections each shift, LCM applies leach solutions in a manner that avoids significant ponding and overspraying the heap leach pad. Ponding and overspraying were not observed during the site inspection of the Recertification Audit.

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

FINDING:

The operation is in full compliance with Standard of Practice 4.5.

BASIS FOR FINDING:

LCM is in full compliance with Standard of Practice 4.5; implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

LCM operates as a zero discharge facility and does not discharge directly or indirectly to surface water. LCM samples surface water and groundwater on a quarterly basis and has not identified any detectable concentrations of WAD cyanide during the Recertification Audit period. The auditors reviewed the quarterly data collected during the Recertification Audit period to confirm.

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

FINDING:

The operation is in full compliance with Standard of Practice 4.6.

BASIS FOR FINDING:

LCM is in full compliance with Standard of Practice 4.6; implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.



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

LCM has implemented measures to protect groundwater beneath and immediately down-gradient of the operation. LCM's cyanide facilities were designed as zero discharge to both surface water and groundwater and were constructed with impermeable containment systems or liners to prevent seepage. LCM has implemented inspection and monitoring programs to ensure water management and leak detection systems are functioning properly, and that water quality is being protected.

LCM has installed and samples groundwater monitoring wells and reviews the analytical data to detect if cyanide seepage occurs. LCM is required to conduct quarterly groundwater monitoring in the monitoring wells located downgradient of the cyanide facilities. Samples are collected from the wells and analyzed for the list of parameters defined in LCM's WPCP, including WAD cyanide. LCM submits the sampling results to the Nevada Division of Environmental Protection (NDEP) on a quarterly basis.

The NDEP Groundwater Standard for WAD cyanide is 0.2 mg/l, which is based on the federal drinking water standard. Review of the quarterly reports during the recertification period indicated no detectable WAD cyanide (i.e., <0.010 mg/L) in the groundwater monitoring wells located downgradient of LCM's cyanide facilities.

The beneficial uses of groundwater below and down-gradient of the mine are a water supply for processing. The potable water well that provides drinking water at the mine site is located up-gradient of LCM's cyanide facilities. No residents live down-gradient of the mine site.

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

FINDING:

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

BASIS FOR FINDING:

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

LCM has provided containment for the cyanide unloading area and cyanide storage and process solution tanks. Containment measures include concrete secondary containment areas for the cyanide storage tanks and process solution tanks within the CIC Plant. No changes or modifications have been made to the secondary containment areas for the cyanide storage tanks and process solution tanks since the previous recertification audit. Since no changes have been made to the secondary containment areas for the storage and process solution tanks, the findings and descriptions from previous recertification audits regarding the secondary containment volumes being sized to hold a volume greater than that of the largest tank within the containment and any piping draining back to the tank, with additional capacity for the design storm event, are still valid. The auditors observed the spill prevention and containment measures for the cyanide unloading area, cyanide storage tanks, and CIC Plant to be in good condition and did not contain debris or extraneous materials that would reduce the containment area capacities.

LCM has procedures in place to prevent discharges of cyanide solution or cyanide-contaminated water that is collected in secondary containment areas to the environment. The Long Canyon Cyanide Management Plan addresses how liquids that collect in cyanide secondary containment areas are managed. LCM has automated the collection sumps in the cyanide storage tank containment area and in the CIC Plant building by installing pumps whose operation is controlled by level switches.



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

LCM has provided spill prevention or containment measures for all cyanide process solution pipelines to collect leaks and prevent releases. No changes have been made to the secondary containment measures for the cyanide pipelines since the previous recertification audit. The auditors observed the spill prevention and containment measures in several locations during the 2024 Recertification Audit site inspection and found them to be in good condition. The solution pipeline containment measures include concrete flooring and sumps within the plant buildings; the barren and pregnant solution pipelines between the heap leach pad and the CIC Plant are located in a lined ditch with the pregnant solution line covered by gravel; and, reagent grade cyanide solution piping from the cyanide delivery trucks to the cyanide storage tanks and into the CIC Plant are located above the cyanide storage tanks concrete secondary containment areas.

LCM has constructed process tanks and pipelines of carbon steel, HDPE, and corrugated polyethylene. These materials are compatible with cyanide and high pH conditions. The auditors observed these materials during the site inspection.

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

FINDING:

FINDING:

The operation is in full compliance with Standard of Practice 4.8.

BASIS FOR FINDING:

LCM is in full compliance with Standard of Practice 4.8; implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

LCM has implemented quality assurance and quality control (QA/QC) programs for the construction and modification of their cyanide facilities during the recertification period. New construction and modifications that occurred since the previous recertification audit include:

- LCM added a bypass line from the CIC Plant Column 6 directly to the PSP to use as an overflow. The bypass line allows LCM to continue dosing cyanide to the barren solution that is being pumped to the heap leach pad while also preventing the addition of cyanide to the overflow solution reporting to the PSP. LCM personnel inspected the new line prior to the line being put into operation
- LCM switched from using lime to caustic to control pH in the CIC Plant. A temporary caustic addition area was added to the CIC Plant in May 2022. The caustic was contained in a tote that was located in secondary containment and was pumped into the process circuit at the BST. In February 2023, a 6,600-gallon caustic tank was installed and replaced the temporary tote. The caustic tank is located in the CIC Plant within existing containment. LCM submitted an Engineering Design Change to NDEP that was reviewed and approved. LCM also submitted the Record of Construction for review to NDEP that included the results of the quality control activities and as-built drawings. NDEP reviewed and approved the Record of Construction.

LCM has implemented QA/QC programs for all earthworks projects related to tank foundations, the Process Solution Pond, and heap leach pad. The QA/QC for these cyanide facilities were reviewed during previous certification and recertification audits.

LCM has retained electronic copies of the QA/QC documentation for its cyanide facilities on NGM's network. Based on review of the retained documentation for the 2024 Recertification Audit, LCM maintains QA/QC documentation for cyanide facilities that have been constructed or modified.



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

FINDING:

The operation is in full compliance with Standard of Practice 4.9.

BASIS FOR FINDING:

LCM is in full compliance with Standard of Practice 4.9; implement monitoring programs to evaluate the effects of cyanide use on wildlife, and surface and groundwater quality.

Section 5 of the Fluid Management System Operating Plan provides procedures for the monitoring of groundwater, surface water, and process solutions. This Plan was updated in April 2024 by the LCM Environmental Department and was reviewed and approved by NDEP. The monitoring activities described in Section 5 include monitoring for wildlife, surface and groundwater quality. The Plan outlines sample location and frequency, provides sample preservation, chain of custody, shipping instructions, and identifies the cyanide species to be analyzed as well as the quality assurance and quality control plan. LCM uses only Nevada certified laboratories for cyanide analyses. Environmental conditions are noted in the field uploaded to and stored in the Monitor Pro database.

LCM monitors for cyanide at two surface water locations and in down-gradient groundwater monitoring wells. LCM conducts the monitoring at frequencies that are adequate to characterize changes in groundwater and surface water quality in a timely manner. Both the groundwater and surface water monitoring frequencies are quarterly.

LCM Heap Leach Operators and CIC Plant operators inspect for wildlife mortalities each shift and document their observations. Any wildlife mortalities that are discovered are reported to the LCM Environmental Department who compiles the data and submits quarterly reports to NDOW. The auditors reviewed the quarterly wildlife mortality reports that were submitted during the Recertification Audit period and no wildlife mortalities have occurred as a result of cyanide use at the facility.



4.5 Principle 5 – Decommissioning

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

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

FINDING:

The operation is in full compliance with Standard of Practice 5.1.

BASIS FOR FINDING:

LCM is in full compliance with Standard of Practice 5.1; plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock and the environment. LCM has prepared two closure plans for their operations that have been reviewed and approved by the US Department of Interior Bureau of Land Management (BLM) and NDEP. The Tentative Plan for Permanent Closure (TPPC) update was submitted to, and approved by, NDEP in July 2020. The TPPC describes activities to reclaim and close process facilities at the conclusion of LCM's operational mine life.

The closure plans have been prepared in accordance with applicable state and federal requirements, and contain measures to address decommissioning of the cyanide facilities, including the heap leach pad, Process Solution Pond, collection ditches, and equipment that has contained process solutions. The plans provide temporary and tentative final closure plans. In addition, LCM's WPCP outlines various closure requirements, including the preparation of a final closure plan, which must be submitted to NDEP before the anticipated date of permanent closure. The final closure plan will incorporate updated conditions and procedures, methods, and schedules for stabilizing spent process materials based on information and experience gathered throughout the active life of the facility. Detailed closure plans are not yet required since closure is not anticipated within the next two years.

The Long Canyon Mine Reclamation Plan includes a comprehensive proposed reclamation schedule that shows heap leach pad reclamation will occur during years one through six after closure of the mine, with the three phases of the heap leach pad being called out separately in the schedule. The schedule accounts for recontouring, cover placement, and revegetation. The Process Solution Pond, and one more pond of similar size that is to be built, will serve as evapotranspiration cells. The reclamation schedule includes a monitoring schedule for reclamation revegetation monitoring as well as water quality monitoring.

LCM is required by the State of Nevada, BLM regulations, and their permit requirements to review and update the Reclamation Plan at least every three years, or more frequently if changes occur. LCM updated their Reclamation Plan and submitted it in 2024 and that has not been approved yet.

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

FINDING:

The operation is in full compliance with Standard of Practice 5.2.

BASIS FOR FINDING:

LCM is in full compliance with Standard of Practice 5.2; establish a financial assurance mechanism capable of fully funding cyanide related decommissioning activities.

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

LCM has developed a cost estimate to fully fund a third-party to perform the decommissioning and reclamation tasks identified in their Reclamation Plan. LCM uses the Standardized Reclamation Cost Estimator (SRCE) spreadsheet to estimate material volumes, structures and piping, and time requirements to complete the decommissioning and reclamation tasks.

LCM is required by NDEP and BLM to review and update the cost estimate at least every three years, or as required by changes in planned disturbances or operational modifications. Internally, NGM requires ongoing annual review and update of the Life of Mine Plan.

LCM has established a financial mechanism approved by the applicable jurisdictions, NDEP and BLM, to cover the estimated closure costs of the mine site, including cyanide-related decommissioning activities. The approval of the most recent amendment for LCM was documented in a Letter of Credit Amendment dated May 6, 2021 and included approval letters from the BLM.



4.6 Principle 6 – Worker Safety

Protect Workers' Health and Safety from Exposure to Cyanide

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

FINDING:

The operation is in full compliance with Standard of Practice 6.1.

BASIS FOR FINDING:

LCM is in Full Compliance with Standard of Practice 6.1 requiring that the site identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.

LCM has Standard Operating Procedures (SOPs) that describe the management and operation of the cyanide facilities. These procedures cover the safe operation of the entire cyanide management facilities, decontamination of cyanide equipment prior to maintenance work, and entry into confined spaces. The documents describe personal protective equipment (PPE) requirements, operator responsibilities, and procedures for using and handling cyanide. The SOPs also require employees and contractors to complete a pre-work inspection checklist prior to performing work with or around cyanide.

LCM's cyanide offload procedure describes requirements for notification of arrival of the delivery truck, area inspection, checking the beginning tank levels, safety buddy requirements, and emergency response. The PPE that must be worn while performing the tasks outlined in the SOPs is listed in the SOPs.

Unloading of cyanide occurred at the plant during the Recertification Audit. Persons interviewed during the unloading process (CIC Plant Operator and Cyanide Delivery Truck Driver) clearly explained their tasks associated with cyanide offloading and related duties. This included the safety buddy process, PPE requirements, and the emergency response process. Based on the auditors' observations, tasks were performed according to the written procedure, including safety precautions, such as checking the PPE equipment (safety showers, designated PPE box) prior to unloading, setting up a barricaded area to restrict access, checking of tank levels, communication between LCM and TransWood, supervision of the entire of off-load procedure by a LCM employee, and sign off of paperwork.

Worker input is actively considered during the development and review of SOPs, including the health and safety requirements within those SOPs. The Operation Supervisor initially creates the SOPs and then the operators have a chance to review and make comments on the SOP before it is finalized and approved. When an SOP is scheduled for a review, the operators review the SOPs and provide comments to the Operations Supervisor so that the Operations Supervisor can incorporate the comments.

LCM holds a daily lineout meeting that includes a safety discussion. LCM also solicits worker concerns and comments on safety issues through safety training and monthly safety meetings. New or revised procedures are rolled out during safety meetings and supervisors are expected to ensure all workers are trained and sign off on the procedures.



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

FINDING:

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

BASIS FOR FINDING:

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

Section 6.2.1 in LCM's Cyanide Management Plan states that based on its solution chemistry, a minimum pH of 9.5 shall be maintained throughout its operation to limit the evolution of HCN. Caustic is added to the barren solution tank to maintain pH. The pH of the process solutions is monitored continuously, and digital displays can be viewed in the CIC process area and on the CIC Plant control room screens. Auditors verified compliance through interviews with operators encountered in the field and visual observations of the digital displays.

LCM has installed five fixed Ultima X HCN Gas Monitors for confirmation that controls are adequate to limit worker exposure to HCN. Three monitors are located in the cyanide storage tank containment area with one above each of the two cyanide pumps, and one above the cyanide pump area. Two fixed monitors are located inside the CIC Plant building with one at the top of the CIC columns (Trash Screen Sensor) and one above the Barren Solution Tank (Barren Tank Sensor).

The monitors have an initial alarm set at 4.7 ppm and a high alarm at 10 ppm. The fixed monitors have an amber warning light at 4.7 ppm and a red light at 10ppm. Alarm lights are mounted outside of the CIC Plant building. These alarms can be observed in the CIC Plant control room and the Administration Building. At the 4.7 ppm alarm, the area is evacuated except for the CIC Plant Operator on duty that will investigate the alarm. At the 10 ppm alarm, a full evacuation is initiated. Cyanide addition to the Barren Solution Tank is interlocked with the HCN monitors and will shut off when the HCN monitors reach the 10 ppm alarm level.

LCM has hand-held HCN monitors (MX-6 and MX-4 Multi-Gas monitors). These are located in the office area of the CIC Plant. These HCN monitors are used when conducting specific activities where the risk of HCN exposure may be higher, such as during a confined space entry procedure or replacing cyanide pumps. Employees are able to use the hand-held HCN monitors as needed.

HCN monitoring equipment is maintained, tested, and calibrated monthly, as directed by the equipment manufacturer. Maintenance is responsible for ensuring that the fixed HCN monitors undergo a monthly calibration according to manufacturer's specifications. When not in use, the handheld portable HCN meters are kept in charging cradles that automatically calibrate the meters. The software iNET stores the calibration data for the portable HCN meters. Calibration records for both portable HCN meters and fixed HCN monitors have been maintained since 2018.

SOPs specify the PPE that is required in each area and appropriate signage is present. Operators wear approved PPE when working around cyanide, including face shields (when required by an SOP), gloves, glasses, goggles (if necessary) and long-sleeved clothing and approved work boots. Additional PPE must be readily available to the LCM employee that serves as the 'Safety Buddy' during cyanide offloading performed by the TransWood Delivery Truck Driver.

LCM has placed warning signs in areas where cyanide may be encountered, and on cyanide facilities warning that the tanks and pipes may contain cyanide solutions. Signage is posted on the gates of the fenced area that surrounds the CIC Plant, heap leach pad, Process Solution Pond, and preg and barren solution pipelines that extend to and from the heap leach pad. Signs cautioning cyanide are located at the entrance doors to the CIC



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

Plant. Other areas of the facility, such as the cyanide offload areas, include signs identifying the presence of cyanide and state No Eating, No Drinking, and No Smoking. Smoking, open flames, and food consumption are not allowed while working around cyanide and all proper PPE must be worn at all times is posted on the warning signs as well. PPE requirements for the safety buddy during cyanide offload is posted in the CIC Plant. Installation of warning signs was verified during the site inspection and all signs were readily visible and in good condition.

LCM has identified tanks and pipes that contain cyanide to alert workers of their contents. The storage tanks containing cyanide were labeled as "Sodium Cyanide". Piping containing reagent-grade cyanide and process solutions were observed for signage, labelling, and directional labels. Labeling on pipes said "cyanide".

Poster boards that are posted around the workplace where cyanide is used were observed during the 2024 Recertification Audit site inspection. These boards identify HCN alarm setpoints, first aid, symptoms of cyanide exposure, locations of antidote kits, cyanide storage facility locations, and pH requirements in place to prevent off gassing.

Cyanide delivered by Cyanco is dyed a red color for clear identification that the product is high-strength liquid cyanide. The Safety Data Sheet for the sodium cyanide delivered to site was reviewed and indicates the solution is dyed. Safety Data Sheets (SDSs) are available through any computer terminal on the site-wide computer network via the Velocity database. Multiple computers are available for LCM personnel within the CIC Plant and the Administration Building. The SDSs are in English, the language used at the operation and that of the majority of the workforce. The sodium cyanide solution SDS was reviewed and is in English. The CIC Plant operator has ready access to the cyanide SDS as well as other SDSs.

Emergency showers located within the CIC Plant were randomly tested for effectiveness and readiness during the 2024 Recertification Audit. Locations of eyewashes and showers were deemed appropriate in terms of proximity to hazards. The CIC Plant has six emergency shower/eyewash stations, four inside the building and two by the cyanide offload/storage area. Alarms sounded when the emergency showers were activated during the site inspection and appeared on the control panel in the CIC Plant control room. Safety shower/eye wash stations at the cyanide offload area are tested each time a shipment of cyanide is delivered. This is documented on the Long Canyon Leach Cyanide Delivery Checklist. Showers throughout the remainder of the CIC Plant building are tested and inspected daily and recorded on the CIC Building and Admin Work Area Inspection Checklist.

Fire extinguishers in and around the CIC Plant and cyanide offload/storage tank area were visible, inspected as verified by observation of inspection tags on each extinguisher, and observed to be ABC dry chemical extinguishers. Fire extinguisher inspections were also reviewed during the site inspection.

LCM utilizes three different tools for investigating incidents, a 'TapRoot investigation' for major incidents and 'Fishbone investigation' or 5-Why analysis for minor incidents. The TapRoot tool is used to investigate and evaluate accidents, including cyanide exposure incidents. The TapRoot tool facilitates the analysis of an incident to determine the "Root Cause" and guides the development of a "Corrective Action" report. All incidents, including environmental or safety cyanide-related incidents, are logged in the Isometrix software system. Isometrix was reviewed to confirm incidents are being logged. No cyanide-related illnesses, injuries, or releases occurred in the previous three years.



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

FINDING:

The operation is in full compliance with Standard of Practice 6.3.

BASIS FOR FINDING:

LCM is in Full Compliance with Standard of Practice 6.3 which requires that the site develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

PPE for the LCM 'safety buddy' during cyanide unloading is located in a plastic tote on the shelf inside the CIC Plant near the cyanide offload/storage tank area. A Cyanokit, oxygen, a resuscitator, and an Automated External Defibrillator (AED) are located in the CIC Admin Building. The CIC Plant Operator inspects the CyanoKit, AED, and oxygen on a daily basis. The CIC Plant Operator also inspects the First Aid Cabinet on a monthly basis. The first aid cabinets, Cyanokit, and oxygen tanks were observed during the site inspection. Auditors verified that the antidote kit was stored in accordance with manufacturer's specifications (secure location, temperature range, with regular checks for expiry dates).

The Cyanide Off-Loading SOP requires the cyanide delivery truck driver to notify the CIC Plant control room who notifies the safety buddy that the cyanide truck has arrived. A camera is directed at the cyanide offload area allowing the Control Room to monitor offload operations. In the event of an emergency, employees are instructed to call the CIC Plant Operator or call 'mayday' over the radio to report an emergency.

LCM's Emergency Response Plan (ERP) Section 8.4.2 – Cyanide First Aid and Cyanide Management Plan Section 6.3 – Emergency Response to Worker Exposure to Cyanide detail specific written emergency response procedures to respond to cyanide exposures. These sections identify the initial signs and symptoms, late signs and symptoms of cyanide exposure, and the first aid steps to be taken when responding to a cyanide exposure through ingestion, inhalation, or absorption, including flushing the patient with water for approximately 20 minutes and what to do for a victim that is fully conscious, unconscious, or not breathing.

LCM has a CyanoKit on site, but must wait for local responders to arrive to administer the CyanoKit as LCM no longer has a Mine Rescue Team or Emergency Medical Technicians on site that are trained to administer the CyanoKit. Prior to local responders arriving on site, LCM personnel are trained in the first aid steps to be taken for a cyanide exposure victim, which includes moving the victim to fresh air, if it is safe to do so, flush the person with water if victim got cyanide on them, administer oxygen, and perform cardiopulmonary resuscitation (CPR) if needed.

If additional medical assistance is needed, an air ambulance or offsite ambulance is available for transporting workers to medical facilities in Elko. LCM's Emergency Response Plan (ERP) Section 9.1 – Air Ambulance/Helicopter Landing Zone includes specific procedures for directing the air ambulance to LCM's landing zone and for meeting and assisting the air ambulance. The ERP also includes contact information for the ambulance services and Elko County Dispatch.

The local hospital, Northeastern Nevada Regional Hospital in Elko, has acknowledged in a letter to Nevada Gold Mines that they have the resources available to provide emergency medical care to workers in the event of a cyanide exposure. If a worker must be transported to the Northeastern Nevada Regional Hospital, LCM will call the hospital to notify them of the arrival of the patient. Based on discussions with LCM personnel, a separate agreement with the air ambulance is not required to bring affected employees to the regional hospital as the air ambulance is managed by Northeastern Nevada Regional Hospital.



4.7 Principle 7 – Emergency Response

Protect Communities and the Environment through the Development of Emergency Response Strategies and Capabilities

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

FINDING:

The operation is in full compliance with Standard of Practice 7.1.

BASIS FOR FINDING:

LCM is in Full Compliance with Standard of Practice 7.1 which requires that the site prepare detailed emergency response plans for potential cyanide releases.

LCM developed an ERP that addresses potential accidental releases of, and exposure to, cyanide in Section 8.4 – Cyanide. Section 8.4.1 describes the immediate actions to be taken in the event of an accidental cyanide release, including evacuations, responding to and controlling the release, communication requirements, and clean-up. In addition, Sections 6.6 and 6.7 in LCM's Fluid Management System Operating Plan include additional details on response, cleanup, and disposal for a process solution release. These plans address controlling releases at their source, containment, assessment, and remedial response to cyanide releases. Prevention of future releases is based on the outcomes from the incident investigation process that includes identification of corrective and preventive actions following a cyanide-related incident.

Cyanco, LCM's cyanide supplier, is responsible for any transportation accidents resulting in a cyanide spill during transport and until the cyanide delivery at LCM is complete as specified in the Master Supply Agreement between NGM and Cyanco. A detailed travel route for transporting 30% liquid cyanide to the offloading area at LCM has been established. Currently TransWood trucks are loaded at Cyanco's Winnemucca Production Plant and travel non-stop on I-80 to the Oasis Exit. The trucks then head south directly to LCM.

Procedures for clearing site personnel from affected areas are described in the ERP and Fluid Management System Operating Plan. While the site is not located in close proximity to any communities that might foreseeably be affected by onsite cyanide releases, the ERP provides contact information for nearby communities, who would be notified in the event of an emergency.

The ERP Section 8.4.2 – Cyanide First Aid identifies the symptoms of cyanide exposure and describes the first aid steps to be taken for cyanide exposure. These steps include moving the victim to fresh air, flushing the victim with water if they came into contact with cyanide, and administering oxygen and CPR, if needed. Local responders or the Carlin Emergency Response HazMat Team will administer the Cyanokit when they arrive.

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

FINDING:

The operation is in full compliance with Standard of Practice 7.2.

BASIS FOR FINDING:

LCM is in Full Compliance with Standard of Practice 7.2, which requires the involvement of site personnel and stakeholders in the planning process.

The LCM workforce participates in the emergency response planning process by attending and contributing to daily lineout meetings that include various safety topics as well as participating in mock drills that are conducted on site.

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

Safety meetings are utilized to provide information and to solicit comments and ideas on cyanide safety procedures as well as cyanide response activities.

NGM's Health & Safety Emergency Response Superintendent participates in the Local Emergency Planning Commission (LEPC) meetings as the representative for NGM's Carlin mines and LCM. During these quarterly meetings, local medical, sheriff, ambulance and other invited guests are present to discuss the safety in and around the neighboring communities. The Carlin HazMat Team members also participate in LEPC drills offsite and members can bring information back to site to share for planning purposes.

LCM does not have any nearby communities that would be affected by cyanide releases at the site; however, local responders from these communities would respond to a cyanide emergency at LCM. Local responders were included in the cyanide emergency drill performed on November 30, 2023, including the Wells Fire Department and Ambulance Crew and the NGM Carlin Hazmat team. The drill was responding to a hypothetical cyanide emergency at LCM's truck scales.

LCM is 30 miles from both the towns of Wells, Nevada and Wendover, Nevada. To keep the communities informed, NGM hosts biannual meetings with the local communities to discuss issues surrounding the transport of cyanide and discuss cyanide safety issues, if any issues occurred since the previous meeting. In addition, NGM's Health & Safety Emergency Response Superintendent participates in local LEPC quarterly meetings where local medical, sheriff, ambulance and other invited guests are present to discuss the safety in and around the neighboring communities.

LCM's ERP identifies offsite responders that have emergency response roles. Offsite responders include the Wells or West Wendover Fire departments for fires around the process areas or within buildings, the Nevada Division of Forestry and Bureau of Land Management for wildland fires on or off the mine property, the Nevada Gold Mines Carlin Emergency Response HazMat Team for chemical spills/releases, and the ambulance or air ambulance services in the event of a cyanide exposure or other severe injury.

Based on discussions with LCM personnel and NGM's Health & Safety Emergency Response Superintendent, LCM incorporates comments, suggestions, and dialogue that is gathered at LEPC meetings, the community meetings, and mock drills into their Emergency Response Plan as applicable.

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

FINDING:

The operation is in full compliance with Standard of Practice 7.3.

BASIS FOR FINDING:

LCM is in full compliance with Standard of Practice 7.3 which requires that the site designate appropriate personnel and commit necessary equipment and resources for emergency response.

Section 7.3.1 in LCM's Cyanide Management Plan (CMP) lists the Primary Coordinator as the Process Manager or designee in the event of a cyanide or other emergency. The Secondary Coordinator is the Plant Operations Supervisor and Chief Metallurgist. LCM has prepared an Emergency & Notification Contacts Care and Maintenance flow diagram that identifies the procedure and 24-hour contact information for the site personnel that will respond during an emergency. LCM's Emergency Response Plan outlines specific duties and responsibilities during an emergency. LCM's CMP lists the emergency response equipment and PPE that is available on site. LCM inspects their CyanoKit, AED, and oxygen on a daily basis.

Since LCM is currently in care and maintenance mode, they do not have an Emergency Response Team on site. If additional assistance is needed, local responders will be dispatched to the site. Offsite responders include the Wells



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

or West Wendover Fire departments for fires around the process areas or within buildings, the Nevada Division of Forestry and Bureau of Land Management for wildland fires on or off the mine property, the Nevada Gold Mines Carlin Emergency Response HazMat Team for chemical spills/releases, and the ambulance or air ambulance services in the event of a cyanide exposure or other severe injury. The Northeastern Nevada Regional Hospital is trained in the use of cyanide antidotes and they are aware of their anticipated roles needed in the treatment of a cyanide exposed victim as confirmed through letters corresponding with the hospital.

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

FINDING:

The operation is in full compliance with Standard of Practice 7.4.

BASIS FOR FINDING:

LCM is in Full Compliance with Standard of Practice 7.4 which requires that the site develop procedures for internal and external emergency notification and reporting.

LCM's Emergency Response Plan (ERP) includes procedures and contact information for management and medical facilities in the event of a cyanide or other emergency. The ERP includes phone numbers for Elko County Dispatch, Wendover Ambulance Service, Elko County Sheriff, and the Bureau of Land Management. Section 7.4 – Notification in LCM's CMP indicates that the Environmental Manager will notify regulatory agencies in the event of a cyanide or other release. The Long Canyon Fluid Management System Operation Plan contains details and requirements for notifying regulatory agencies of a process solution release out of containment.

Typically, the Corporate Social Responsibility (CSR) group is tasked with notifying the area community representatives, as well as the media if required, for cyanide-related incidents. LCM's ERP details the roles and responsibilities of the CSR group in the event of a cyanide incident.

While the site is not located in close proximity to any communities that might foreseeably be affected by onsite cyanide releases, the ERP provides contact information for nearby communities (City of Wells and City of Wendover) and procedures for contacting them in the event of a cyanide-related incident.

LCM's ERP (Section 8.4.1) and CMP (Section 7.4) include a procedure for notifying ICMI of any significant cyanide incidents. The definition of a significant cyanide incident, the requirements for notifying ICMI, and ICMI's contact information. LCM has not had any significant cyanide incidents during the 2024 Recertification Audit period.

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

FINDING:

The operation is in full compliance with Standard of Practice 7.5.

BASIS FOR FINDING:

LCM is in Full Compliance with Standard of Practice 7.5 which requires that the site incorporate remediation measures and monitoring elements into response plans that account for the additional hazards of using cyanide treatment chemicals.

LCM's Fluid Management System Operating Plan and CMP address remediation measures for a cyanide release. Both plans require that soils affected by a process solution release are to be excavated and placed on the heap leach pad. Spilled cyanide solution within the CIC Building will be returned to the leaching circuit via the floor sumps. The



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

Long Canyon Cyanide Equipment Decontamination SOP details procedures for decontamination of equipment or materials that may come into contact with cyanide solution.

Per discussions with the Environmental Department, all spill clean-up debris related to a cyanide spill would be rinsed per the Long Canyon Cyanide Equipment Decontamination SOP and properly disposed of on the heap leach pad or disposed offsite as either non-hazardous or hazardous waste as appropriate.

A cyanide release at LCM is not expected to impact surface waters, as no surface waters are located in close proximity of the CIC Building or heap leach pad. Even though the potential to release cyanide to surface water does not exist at LCM, LCM's Fluid Management System Operating Plan, Section 6.7 – Neutralization, Cleanup, and Disposal states that the use of chemicals such as sodium hypochlorite, ferrous sulfate, or hydrogen peroxide to treat cyanide solutions released to surface water is prohibited.

In the event of a cyanide spill, the Nevada Division of Environmental Protection (NDEP) will require LCM to conduct extensive soil sampling to verify that residual cyanide has been removed from the area affected by a cyanide release after the completion of cleanup activities. NDEP and LCM will coordinate on the soil-sampling requirements. Typically, NDEP determines the extent and location of soil sampling.

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

FINDING:

The operation is in full compliance with Standard of Practice 7.6.

BASIS FOR FINDING:

LCM is in Full Compliance with Standard of Practice 7.6, which requires that the site periodically evaluate response procedures and capabilities and revise them as needed.

LCM's Cyanide Management Plan (CMP) requires LCM to review, evaluate, and revise the ERP annually and after any cyanide incident requiring the implementation of the ERP. In addition, the ERP states that it is to be reviewed following any incident requiring its implementation to determine if the planned response procedures were adequate or require revision. Any findings or corrective actions identified in a spill/release post-mortem or mock drill that can improve the ERP are incorporated into the ERP. LCM updated both plans to reflect the current care and maintenance mode of operation at LCM. The most recent version of the ERP and CMP are dated May 21, 2024.

LCM performs various drills on a routine basis. The fire drills performed in July and November 2023 were conducted to ensure all LCM employees were aware of, and to reinforce, the location of the new muster point, which is important in the event of a cyanide emergency.

LCM conducted an extensive cyanide emergency drill on November 30, 2023. The drill was for a cyanide transport truck that was on fire at LCM's scales. Local responders (Wells Fire Department and ambulance service) and NGM's Carlin Emergency Response HazMat Team responded and came to the site to test their response time. After the drill, LCM personnel, the local responders, and NGM's Carlin Emergency Response HazMat team discussed access to mine property, location of site hazards, resources, exposures, and location and use of the CyanoKit. LCM also took the local responders on a site tour, including the identification of emergency supplies and storage locations. A debrief was held after the drill and site tour to answer any questions regarding the site. The After-Action Report indicated that all parties were satisfied with the outcome, response times to LCM, and site protocols/procedures.



4.8 Principle 8 – Training

Train Workers and Emergency Response Personnel to Manage Cyanide in a Safe and Environmentally Protective Manner

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

FINDING:

The operation is in full compliance with Standard of Practice 8.1.

BASIS FOR FINDING:

LCM is in Full Compliance with Standard of Practice 8.1 which requires that the site train workers to understand the hazards associated with cyanide use.

LCM employees receive cyanide safety training as part of their new hire training program and during their annual refresher training. The new hire training presents a general overview of cyanide including safe handling, required PPE, safety showers/eyewashes, cyanide poisoning/routes of exposure and symptoms, and first aid for exposure. Workers who are assigned to specific areas of the operation where cyanide is an integral part of the process (i.e., CIC Plant operators and heap leach pad operators) are given additional training, which includes the safe use and handling of cyanide with on-the-job departmental training before beginning work in the designated areas. Training criteria has been established for the CIC Plant and Leach Pad operators. The training criteria checklists are detailed and include training on the tasks they will be performing in each work area.

Contractors who will be working on site in areas where cyanide may be present must complete the on-line Convergence training. This training includes a section entitled 'Cyanide Safety'. This presentation covers cyanide characteristics, routes of exposure, required PPE, prohibitions in cyanide areas (no eating, drinking, chewing, or smoking), HCN monitor set points and required actions, and symptoms of cyanide exposure.

LCM conducts on-site induction training for visitors. The on-site induction training includes a site tour of the facilities in which cyanide is present and cyanide hazard recognition.

Annual refresher training for cyanide consists of attendees individually completing the Cyanide Code Assessment, which is a written exam, and then as a group, they discuss the answers and answer any questions. The Cyanide Code Assessment includes a true/false section, short answers, and matching terms with phrases. The assessment is focused on cyanide recognition, exposure routes, symptoms of exposure, first aid steps, and HCN generation and alarm levels.

LCM retains records related to cyanide training in the Administration Building for current employees. The auditors reviewed a representative sampling of training records for several employees, including CIC Plant Operators, Heap Leach Operators, and Supervisors, to confirm the completion of training and verify the record retention process. The review included looking at Cyanide Code Assessments, operator training checklists, and signed SOP acknowledgement forms that were completed during the 2024 Recertification Audit Period.



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

FINDING:

The operation is in full compliance with Standard of Practice 8.2.

BASIS FOR FINDING:

LCM is in Full Compliance with Standard of Practice 8.2 which requires that the site train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community, and the environment.

LCM personnel in job positions that involve cyanide management receive training on how to perform their assigned tasks with minimum risks to worker health and safety in a manner that prevents unplanned cyanide releases. LCM employees who will be working with cyanide are required to receive cyanide safety training, job-specific training for each task that they will be performing on the applicable circuits, and the SOPs related to each of the circuits before they are scheduled to work in a cyanide area. The LCM training program includes training presentations, training checklists, and SOPs for specific tasks. Each operator working in a cyanide area is task trained by a qualified operator. Workers are trained on the equipment and required to demonstrate competency prior to working unsupervised on a job. The Leach Pad Operations and CIC Process Plant training checklists outline the tasks that new operators must be trained on prior to working in these areas. These checklists include the requirement that operators review all applicable SOPs and acknowledge that they have read and understand the SOPs by signing the SOPs.

Annual refresher training for cyanide consists of attendees individually completing the Cyanide Code Assessment, which is a written exam, and then as a group, they discuss the answers and answer any questions. The Cyanide Code Assessment includes a true/false section, short answers, and matching terms with phrases. The assessment is focused on cyanide recognition, exposure routes, symptoms of exposure, first aid steps, and HCN generation and alarm levels.

In addition, if a supervisor observes a deficiency when an operator is performing a task, the supervisor will provide task-specific training or assign an experienced operator to complete additional training.

LCM tests their employees who work with cyanide in both written and verbal formats. Written tests are kept in the personnel files to ensure employees are current and tested. A competent person trains and observes a new employee working before signing the new employee off on the training checklist. The new employees must demonstrate knowledge for each task identified on the training checklist.

Training records throughout an employee's employment at LCM are kept in their files located in the Administration Building and on the NGM 'S' drive in the Long Canyon Business Assistant folder. Tests and associated Mine Safety and Health Administration (MSHA) 5000-23 training forms are kept in these files and uploaded via scanning into electronic format. The training records include the trainer, topics covered, date of training, and how the employee demonstrated an understanding of the training materials.

A review of training records for several operators was conducted for completeness. The records included the SOPs that were reviewed with, and signed off by the employee, completed Cyanide Code Assessments, and completed training checklists.



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

FINDING:

The operation is in full compliance with Standard of Practice 8.3.

BASIS FOR FINDING:

LCM is in Full Compliance with Standard of Practice 8.3 which requires that the site train appropriate workers and personnel to respond to exposures and environmental releases of cyanide.

As part of their training, site personnel who may be called upon to respond to a worker cyanide exposure or cyanide release are trained in the applicable response procedures, including decontamination and first aid procedures. Employees working with cyanide are trained in cyanide awareness, cyanide emergency response actions, first aid for cyanide poisoning, spill response (spills and leaks in the process area, spills during transportation of cyanide, etc.), emergency communication procedures, signs, audible and visual alarms, and the information contained in the cyanide SDS. LCM requires and provides annual refresher training for cyanide management to all LCM employees, including responding to cyanide and other incidents.

Per discussions with NGM's Health & Safety Emergency Response Superintendent and review of the Carlin Surface Emergency Response Team (ERT) Training Plan, the Carlin Emergency Response HazMat Team members receive extensive training. Training includes MSHA, HazMat, and First Responder training, firefighting, advanced first aid, vehicle and equipment rescue, rope rescue for confined space and highwall rescues, HAZMAT training (spill response, donning equipment and suits, including self-contained breathing apparatuses (SCBAs) and Level A suits, etc.). New team members take a 40-hour class and all team members receive an 8-hour annual refresher plus 10 hours of monthly training.

Since LCM moved into care and maintenance operations, they now rely on local responders and NGM's Carlin Emergency Response HazMat Team in the event of a cyanide or other emergency. During the November 30, 2023 mock cyanide drill, LCM personnel discussed access to the mine property, location of site hazards, resources, exposures, and location and use of the CyanoKit with the external responders that participated in the drill, which included the Wells Fire Department and ambulance crew and the NGM Carlin Emergency Response Hazmat team. After the discussion, LCM took the external responders on a site tour to identify emergency supplies and storage locations.

Training records are retained and document the training LCM employees receive and the Carlin Emergency Response HazMat Team receives. The records include the names of the employees as well as the trainer(s), the date of each of the training, and the topics covered. Employees are tested to demonstrate their understanding of the training materials. The test results are documented and kept in their personnel files. NGM's Health & Safety Emergency Response Superintendent maintains the training records for the Carlin Emergency Response HazMat Team members.

The auditors verified compliance through interviews and a review of a representative sampling of training records from the 2024 Recertification Audit period.



4.9 Principle 9 – Dialogue and Disclosure

Engage in Public Consultation and Disclosure

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

FINDING:

The operation is in full compliance with Standard of Practice 9.1.

BASIS FOR FINDING:

LCM is in Full Compliance with Standard of Practice 9.1 which requires the site to promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns.

LCM meets with the communities of Wells and Wendover on a biannual basis. At these meetings, LCM presents information to public officials and general public members regarding cyanide awareness and other issues that can affect these communities.

Auditors reviewed the slide presentations that LCM shared with the local communities during the October 2022, June 2023, December 2023, and May 2024 community meetings. The presentations included permitting updates, community updates, cyanide awareness (Cyanco attended and presented during the October 2022 meeting), and NGM's communities and social performance. The October 2022 meeting with Wells and Wendover community members did not generate any questions in regard to cyanide. Feedback cards are provided to meeting attendees so that they can provide written feedback.

Stakeholders can place grievances by calling a toll free number for Nevada Gold Mines or reaching them through their email at community@nevadagoldmines.com. NGM provides community cards to stakeholders that list the toll free number and email address. Based on discussions with NGM's Community Engagement and Development Specialist, no grievances were received regarding the LCM.

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

FINDING:

The operation is in full compliance with Standard of Practice 9.2.

BASIS FOR FINDING:

LCM is in Full Compliance with Standard of Practice 9.2 which requires that the site make appropriate operational and environmental information regarding cyanide available to stakeholders.

LCM holds biannual community meetings where members of the public are provided with information on the operation and the use of cyanide. LCM conducts periodic tours of the facility. Tours are focused on educational purposes and for recruiting and job shadowing. For tours that involve school children, LCM provides a coloring book entitled "How Gold is Made". NGM also provides this book to school children when NGM visits schools.

LCM's Water Pollution Control Permit requires that the operation file quarterly and annual reports to the NDEP that include a report of any cyanide spills and releases. NDEP makes information regarding incidents publicly available through a request process. A database of open and closed cleanup activities is accessible through NDEP's website. LCM is required to complete MSHA reports that include any cyanide-related worker exposure or death. MSHA posts fatality summaries on their website. LCM would share cyanide exposure incidents, including those exposures that resulted in hospitalizations, with the public during the quarterly community meetings.

No incidents of cyanide releases or exposures occurred at LCM during the 2024 Recertification Period.



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