

SUMMARY AUDIT REPORT
FOR THE
INTERNATIONAL CYANIDE MANAGEMENT CODE


NEWMONT MINERA YANACOCHA
CAJAMARCA, PERU

JUNE 2021

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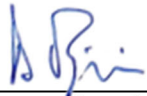
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Name of Mine: Yanacocha

Name of Mine Owner: Newmont Mining Corporation

Name of Mine Operator: Minera Yanacocha

Name of Responsible Manager: Melissa Graham - Manager – Environment

Address: Cajamarca, Perú

State/Province/Country: Cajamarca, Perú


Telephone/E-Mail: Tel: 076 584000
Melissa.graham@newmont.com

LOCATION DETAIL AND DESCRIPTION OF OPERATION:



Yanacocha, the largest gold mine in South America, is located in Cajamarca 800 kilometers northeast of Lima, Peru. Its area of operations is 45 kilometers north of the district of Cajamarca, between 3,500 and 4,100 meters

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above sea level. Its activity is developed in four basins: Quebrada Honda, Chonta River, Porcón River and Rejo River.

In 1990, the first feasibility studies were carried out to start work on a pilot plant for battery leaching. With the start of operations in an area called Carachugo, Yanacocha produced its first doré bar on August 7, 1993.

Yanacocha was legally incorporated in 1992 and is made up of the following shareholders: Newmont (51.35%) based in Denver, USA; Compañía de Minas Buenaventura (43.65%), Peruvian company; and Sumitomo Corporation (5%) Japanese company.

Yanacocha operations comprise open pit mines, waste rock storage areas, heap leach facilities, cyanide offloading facilities, process plants (carbon in columns and Merrill Crowe), mill, tailings storage facility, comprehensive storm water channel and sedimentation pond network, run-on diversions, acid rock drainage treatment plants, and water treatment plants for cyanide destruction. The auxiliary facilities required for the mining operation include administration offices and buildings, laboratories, warehouses, maintenance shops, emergency facilities, electric power distribution, water supply, roads, fuel and reagent storage tanks, drainage structures, and explosive storage areas.

Yanacocha receives solid sodium cyanide from Orica Australia Pty Ltd (Orica) delivered to the site in the isotanks. The Orica supply chain is certified as compliant with the Code by third-party auditors. The isotanks are delivered by DCR Minería y Construcción S.A.C (DCR), a trucking company under contract to Orica. The isotanks are staged at a secured parking area on the northeast corner of the La Quinua pad while awaiting sparging or awaiting return to the vendor. DCR provides drivers to deliver the full isotainers to the plants and return the empty isotainers to the staging area. Isotainer offloading facilities are located at the Gold Mill, Yanacocha Norte Plant, and the Pampa Larga Plant.

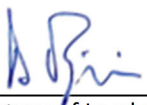
The open pits have been developed by conventional mining methods using trucks and loaders to extract gold-bearing ore. The waste is transported by trucks to adjacent waste rock storage areas designed specifically for this purpose. Ore is blended with lime and placed on the heap leach facilities by truck.

LEACHING PROCESS

The heap leach piles are stepped pyramid-like structures where the extracted ore accumulates. To this material is applied, through a drip system and spray irrigation, a cyanide solution of 50 milligrams per liter of water, which dissolves the gold. Using a system of pipes placed at the base of the heap leach piles, the dissolved solution of gold and cyanide – called rich solution – passes into a leach or process pool, from where it is pumped to the process plant. The base of the heap leach piles are covered by geomembranes, which are high-strength plastic material that prevents the contact of chemicals with the soil, taking care of the quality of the water.

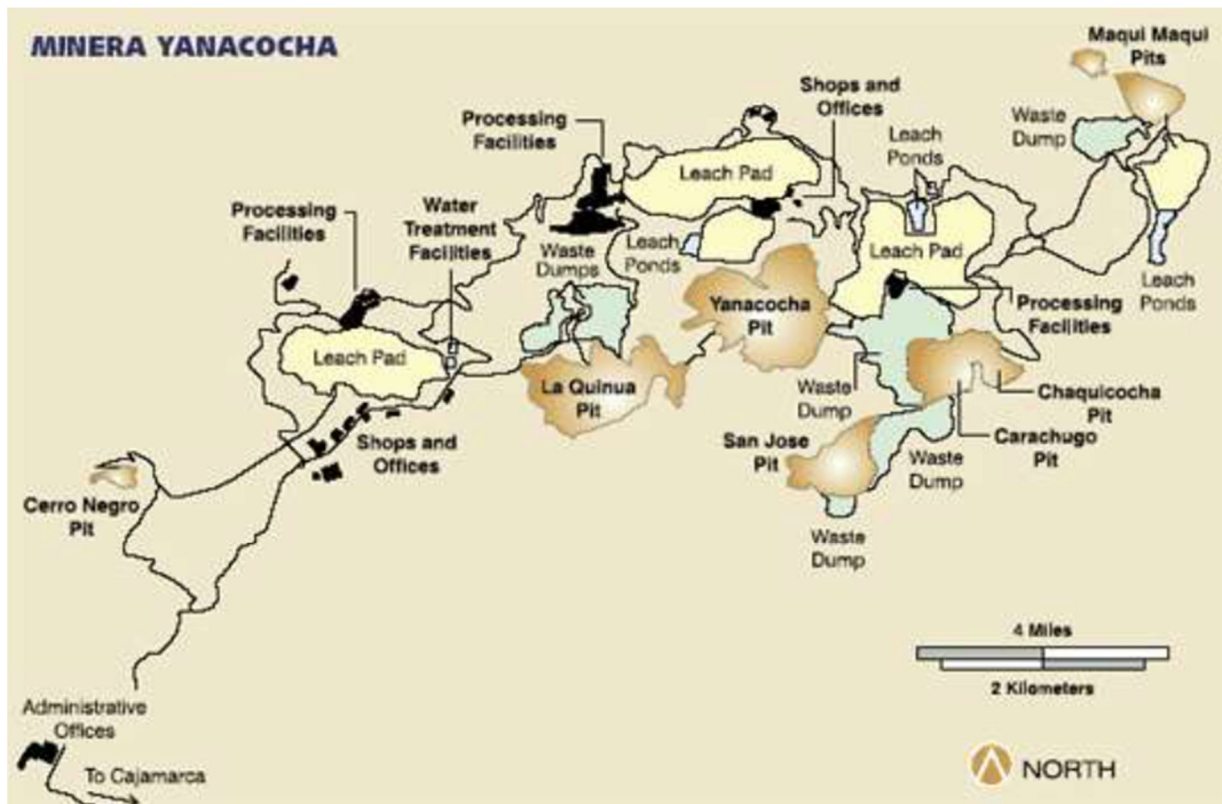
Yanacocha operations are divided into four major areas known as (from west to east) La Quinua, Yanacocha Norte, Pampa Larga (the leach facilities adjacent to the Pampa Larga process facilities are referred to as the Carachugo pad), and Maqui Maqui. The heap leach facilities at Yanacocha are all constructed with similar components

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including the fully lined geomembrane heap leach pads, operational ponds for collection of pregnant leach solution (PLS), and minor event ponds to collect and store storm water related to a 100-year, 24-hour storm. The operations ponds at each heap leach facility are constructed with triple geomembrane liners with two leak collection and recovery systems (LCRS). All the heap leach facilities are constructed with underdrain systems to collect and convey shallow groundwater. The underdrain flows are collected in sumps for identification and control of any process solution leak. The general site layout is shown below.

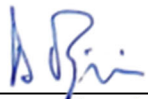


GOLD MILL PROCESS

The Gold Mill mineral processing plant seeks to process metal that cannot be obtained by leachate in piles. Gold is recovered in 24 hours, unlike the battery leaching process that takes nearly 60 days.

The Gold Mill includes crushing, grinding, and tank leaching. The tailings are sent to the Mill Sands Storage Facility, located in the south central portion of La Quinua Pad. This tailings facility is geomembrane-lined with underdrains. In 2013, Yanacocha made improvements to the sulfurization, acidification, recirculation, and thickening (SART) circuit. The acidification, volatilization, and reneutralization (AVR) circuit was not operating at the time of the audit.

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Construction of the Gold Mill began in mid-2006 and concluded in early 2008, with an investment of \$270 million and a 9-year production plan. 1500 workers participated in the construction of this important work that has a processing capacity of 5,000,000 ton/year.

CARBON COLUMNS

Yanacocha operates three separate recovery systems to recover the gold and silver from the pregnant leach solution: 1) a Carbon Plant at La Quinua, 2) a Carbon Plant and a Merrill Crowe Plant at Yanacocha Norte, and 3) a Merrill Crowe plant at Pampa Larga. The Maqui Maqui leach facility sends its pregnant solution to the Pampa Larga Plant and the Gold Mill sends its pregnant solution to the La Quinua Plant.

Carbon columns process that allows to concentrate the amount of gold that is in the rich solution, to then recover it in the Merrill Crowe process, which occurs in two stages. The first is the desorption stage, in which by circulating a cyanide solution, the gold trapped on the surface of the activated carbon is removed. The second stage is adsorption; in it the rich solution (with the gold in liquid state) is passed through columns loaded with activated carbon, so that the gold is trapped in the pores of the carbon .

MERRILL CROWE

The solution rich in gold and silver is filtered and cleaned. Then the oxygen is removed and zinc powder is added to precipitate the metal and make it solid. The product of Merrill Crowe is the one that then passes to the refinery process.

The poor solution, without gold, is called also Barren. This is sent back to the PAD, first passing through a tank to add the cyanide that was consumed during the process. In this way a closed circuit is completed where the solution used does not go out into the environment, but is constantly reused.

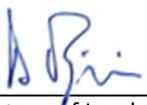
REFINERY

The gold obtained in the Merrill Crowe process is subjected to drying operations in retort ovens at 650° C. Finally, the product obtained goes through a process of smelting in electric arc furnace at 1,200° C to obtain the Doré, which is a bar made of a mixture of gold and silver.

WATER MANAGEMENT

Managing the process water balance is a critical function at Yanacocha because of the relatively high precipitation occurring in a well-defined rainy season. Yanacocha has integrated the water management process between the four separate operating units by interconnecting the different operational process ponds and processing plants with pipelines. Yanacocha has a water monitoring system that includes real time automated flow and level monitoring and telemetry to report the information on an hourly basis to the Water Management Group within the Process Department. The system allows real time data collection from process ponds, leach rates, recirculation rates, inter-operational pump flow rates, and climatic data from onsite weather stations. All changes in process

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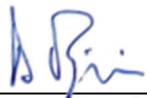

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water flow rates must be reviewed by the Water Management Group to prevent the potential for overtopping. Yanacocha has the ability to convey process solutions between all four operations enabling them to balance their water use more effectively. Operators have information from the operations plan related to response actions required as the pond levels rise.

To manage the positive water balance during the rainy season, Yanacocha operates two Excess Water Treatment Plants (EWTPs) and five reverse osmosis (RO) units to destroy cyanide and remove metals. The plants are located at Yanacocha Norte and Pampa Larga. The treated water is conveyed to the Buffer Pond located at Pampa Larga for monitoring prior to discharge to the Quebrada Ocuchomachay or San Jose Reservoir. The EWTPs use a multiple step treatment system including alkaline chlorination for cyanide destruction, sodium hydrosulfide for metals precipitation, and ferric chloride addition for coagulation. Chlorine is also added at the end to further reduce cyanide concentrations. Yanacocha Norte also has an acid water treatment plant (AWTP) to manage acidic drainage from mine water facilities.

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AUDITOR'S FINDING

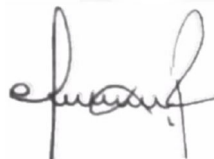
This operation is

- ☒ in full compliance with with the International Cyanide Management Code
- ☐ in substantial compliance with
- ☐ not in compliance with


This operation has maintained full compliance with the International Cyanide Management Code throughout the previous three-year audit cycle.

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

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

Audit Company:	BP Cyanide Auditors S.A.C.
Lead Auditor:	Bruno Pizzorni Calle E-mail: bpizzorni@cyanideauditor.com
Technical Auditor:	Fernando Rodríguez Rossi E-mail: fernando@rdzconsulting.com
Signature of Technical Auditor:	
Dates of Audit:	May 24 th to 27 th , 2021

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Verification Protocol

PRINCIPLE 1 - PRODUCTION

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

STANDARD OF PRACTICE 1.1

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

The operation is

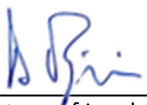
- ☒ in full compliance with Standard of Practice 1.1
- ☐ in substantial compliance with
- ☐ not in compliance with

Yanacocha has a current agreement with Orica to purchase and transport of solid sodium cyanide to the mine site valid for the period 2017 to 2021. The agreement requires the facility has to be certified as being in compliance with the Code. The auditor reviewed purchase orders, commercial invoices and goods of receipt for the recertification period. The contract, shipping documents, reception and purchasing records were available and reviewed with Yanacocha's Supply Chain Officer.

Yanacocha purchases cyanide produced in Orica's Yarwun Production Facility, which is located 9 km north-west of Gladstone, Queensland, Australia. The production plant was found in compliance with the Code, achieving their initial certification in 2006, then recertified the Code in 2010, 2013, 2017 and last recertification was in September 17, 2020 which is valid for the next 3 years, in accordance with the provisions of the ICMI. The current full certification status of this facility was verified by review of the ICMI website.

Cyanide is purchased directly from Orica, the cyanide manufacturer.

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PRINCIPLE 2 - TRANSPORTATION

Protect communities and the environment during cyanide transport.

STANDARD OF PRACTICE 2.1

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

The operation is

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


Yanacocha has a written agreement with Orica which includes sodium cyanide purchase and transportation from the production facility in Australia to the mine site at Yanacocha, Cajamarca, Perú. According to it, Orica is obliged to transport sodium cyanide from the Yarwun production facility to the mine site. To this end, Orica uses its cyanide supply chains duly certified in the Code, to transport sodium cyanide from the production facility site to the mine. The contract indicates that Orica will implement in its operations and those of its transport subcontractors all the compliance provisions required by the Cyanide Code related to manufacturing, handling, storage, packaging, labelling, transport and emergency response of sodium cyanide. It also indicates that Orica contractors must have drivers duly qualified and trained for the transport of hazardous materials, which must have a valid driver's license, the category corresponding to the vehicle driving and its special category driver's license for drivers of ground transport units of hazardous materials. Likewise, the carrier must have transport units which must have passed the technical inspection and the vehicle rating required by the corresponding national regulations. Preventive and corrective maintenance of loading vehicles shall be carried out.

Convoys are used to road transport cyanide product in isotanks from Callao Box to Sparge Tank Transfer Facility to the mine site. A lead vehicle leads the convoy consisting of no more than 6 transport trucks. Yanacocha and the transporter personnel organize the off-loading of the product once the transport convoy has reached the mine site. Convoy personnel are required to participate in the mine site induction training to familiarize themselves with site protocols.

The auditors reviewed a letter from June 2019 where Orica informs the start of the shipment of sodium cyanide with colorant.

Although no subcontractors are involved in contracts holders of Orica's cyanide supply chain, the agreements specify that the designated responsibilities extend to any subcontractor. Each entity involved in the cyanide transport operation whether by sea, in port or during land transport is operated directly by the contract holder.

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STANDARD OF PRACTICE 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 with Standard of Practice 2.2
☐ in substantial compliance with
☐ not in compliance with

All agreements reviewed between Yanacocha and the cyanide transporters require the transporter to be certified under the Cyanide Code.

During the audit, it was verified through the ICMI's website, that all cyanide transporters involved in Orica's cyanide supply chain until Yanacocha mine site are Code certified companies. The transport segment between the Production Facility to the port of Brisbane in Australia, is included in Orica Australia Supply Chain; from Brisbane to the port of Callao, Perú, the transport is certified under Orica's Global Marine Supply Chain; and transport from Callao to the mine site, including Orica's Box to Sparge Tank Transfer Facility, cyanide transport is comprised in Orica's Latin America Supply Chain. The Orica Latin America Supply Chain was recertified on August 13, 2021, as shown on the Cyanide Code website.

Yanacocha maintains records of the chain of custody documents from the producer, the maritime transporter and land transporters that handle the cyanide brought to its site, all identifying the parties in the supply chain. The auditor reviewed bill of lading documentation covering the recertification audit, identifying all transporters certified in compliance with the Code.

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PRINCIPLE 3 - HANDLING AND STORAGE

Protect communities and the environment during cyanide.

STANDARD OF PRACTICE 3.1

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

The operation is

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

Yanacocha designed and constructed cyanide unloading, storage and mixing facilities in accordance with guidelines, environmental and sectorial permits in Peru and accepted engineering practices. It is important to mention that during this new recertification period, no new unloading, storage or mixing facilities has been built at the mine.

Yanacocha continues to store the isocontainers in the Cyanide Yard (1,000 square feet fenced open platform) at La Quinoa Leach Pad, away from surface water, from people or any infrastructure as offices, shops, or active leaching. From this yard Orica sends the isocontainers to the different plants upon request by operations. All surface drainages surrounding the Cyanide Isocontainers Yard are conducted to the contact water system of the pad consistent of an operation pond, a minor and major events ponds.

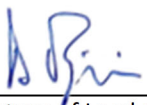
The Isocontainers Storage Yard is in an inactive area of La Quinoa Pad, and provides adequate ventilation, the platform provides appropriate sloping to avoid inundation and are located in a secure area with a fence, closed gate, 24-hour security and isocontainer valves with certified locks in place. All surface drainages surrounding the Cyanide Isocontainers Yard are conducted to the contact water system of the pad consistent of an operation pond, a minor and major events ponds. The process plants also have a drainage system in case of emergencies and any solution will go to a sump system and recirculated within the plant.

Yanacocha has offloading areas at Gold Mill, Pampa Larga, and Yanacocha Norte, that provides adequate ventilation, the platform provides appropriate sloping to avoid inundation and are located in continues to be in fenced areas with full time security guards.

Regarding the cyanide storage tanks, Yanacocha's cyanide mixing and storage tanks area at Pampa Larga, Yanacocha Norte and Gold Mill have the following controls:

- Tank level sensors set up at high (90%) and high-high (95% capacity)

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- Alarms installed on both tanks at the preparation area.
- Control Room at each plant with operator monitoring the preparation activities
- Closed Circuit (CC) Camera connected to the Control Room

Process tanks, including mixing and storage tanks, are built over reinforced concrete foundations, which prevents any seepage from the tank bottoms from entering the ground. The auditor walked through all three plants concrete foundations and containment systems were in good condition.

STANDARD OF PRACTICE 3.2

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

The operation is

☒ in full compliance with Standard of Practice 3.2

☐ in substantial compliance with

☐ not in compliance with

The auditor verified that Isocontainers provided by Orica in Yanacocha are only used to transport sodium cyanide. Isocontainers are rinsed on the outside and returned to the storage yard area in La Quinua, labelled accordingly and then removed from site and shipped back to Orica with appropriate rinsing certificate.


Additionally, Yanacocha has established emergency procedures indicating that spills during cyanide mixing activities must be timely clean up. Any liquid spills or leaks within the concrete containments are washed to the sump pit and pumped back into the process circuit.

Other operational procedures require personnel during sparging to wear PPE including chemical suit, full-face mask, hardhat, rubber boots, chemical gloves and a personal HCN gas monitor. The Buddy System (second individual to be present) is also implemented and verified during observation of a cyanide sparging in Pampa Larga.

Yanacocha also has several procedures in place that describe the operation of valves and couplings at all three plants. The auditor observed the preparation of one isocontainer at Pampa Larga and verified checklists were adequately completed. Operational procedures reviewed have cross references to emergency procedures. Also, these procedures reviewed requires personnel during sparging to wear PPE including chemical suit, full-face mask, hardhat, rubber boots, chemical gloves and a personal HCN gas monitor.

Orica's solid sodium cyanide in isocontainers comes with the colorant incorporated, which allows cyanide solution to turn colored during the cyanide-sparging process.

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PRINCIPLE 4 - OPERATIONS

Protect communities and the environment during cyanide transport.

STANDARD OF PRACTICE 4.1

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

The operation is

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

Yanacocha has management systems in place that support the implementation and maintenance of cyanide-related practices and controls. Main systems are:

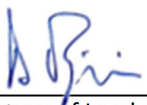
- ISO 14001: 2015 Certified Environmental Management System
- ISO 45001: 2018 Certified Safety & Health (S&H) Management System
- ISO 17025 Analytical Laboratory Quality Control and Assurance
- Adherence against the International Cyanide Management Code (ICMC) Performance Expectations
- Environmental Health & Safety (EHS) Data Management – Cintellate Software

Especial attention was given to the Process Pond System Carachugo 14, which was built and put in operation in year 2019 and it was reported as the only major change built in Yanacocha for this recertification period.

Yanacocha provided a master list of all relevant Standard Operation Procedures (SOP's), which are divided by areas and by processing plant. These are:

- Isocontainer storage facility at La Quinoa Leach Pad
- Isocontainer offloading facilities at Gold Mill, Pampa Larga and Yanacocha Norte
- Gold Mill (not in operation since January 2021)
- Tailings/Mill Sands Storage Facility
- Leach Pads at: La Quinoa, La Quinoa 8, Carachugo, Yanacocha Norte, Pampa Larga and Maqui Maqui
- Processing Plants at: La Quinoa, Yanacocha Norte, Gold Mill, Pampa Larga, Maqui Maqui
- Process Ponds (Operations, Minor and Major events) at: La Quinoa, La Quinoa 8, Yanacocha Norte, Pampa Larga, Carachugo 14, Maqui Maqui, Pit Contingency Pond

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Plant procedures and solutions management control philosophy have been maintained and kept updated which also include parameters for design criteria developed by SNV-Lavalin for the Carachugo 14 Leach Pad and the Pregnant Solution Ponds System (system built during this recertification period). The design criteria for all other ponds in Yanacocha continue to be reviewed and maintained following Newmont standards. Critical design parameters are referenced in the original design criteria; however, these are adjusted based on water balance updates.

Yanacocha has maintained and kept updated work procedures for cyanide related tasks, which describe the standard practices necessary for the safe and environmentally sound operation of the cyanide facilities. These procedures address environmental, safety, operational controls, inspection requirements and preventative and corrective maintenance aspects of the facilities. Procedures were available for both normal and/or emergency operating conditions.

Yanacocha has showed evidence of maintaining its Management of Change (MoC) Standard and Procedure, presenting a master list of MoC's conducted during the three-year recertification period. Environment, Health and Safety personnel have reviewed and signed-off on all proposed cyanide-related process changes and modifications. The auditor reviewed the following examples as a sampling of completeness of a MoC process:

- Excess Sludge Dredging from Yanacocha Norte Minor Events Pond to the Raw Water Pond (May 2021)
- Valves Cleaning System in NaCN addition circuit tanks N°1 and N°2 at Gold Leach (Oct 2020)
- Design and execution of pregnant solution valves spill protection system in La Quinua 1-7 and WOX areas (July 2019)

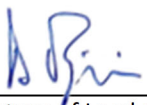
Yanacocha has incorporated contingency procedures into various standard operating procedures (SOP) and management plans at the operation; related to high precipitation events, seismic events, or situations when inspections and monitoring identify a deviation from design or SOP.

The operation has cyanide management contingency procedures for situations when a temporary closure or cessation of operations may be necessary, as it has been reviewed in the latest Closure Plan Modification dated 2020. The plan has been tested with the cessation of the Gold Mill Plant in January 2021, with a shutdown of the mill and processing facilities.

Yanacocha has an established program to conduct inspections of cyanide facilities with frequencies that varies from daily, weekly, monthly and quarterly, depending on the area that performs the inspection. The auditor verified inspection forms/registers for several periods during year 2018, 2019, 2020 and 2021 in the following facilities:

- Gold Mill Plant and Cyanide Sparge System
- Carachugo 14 Leach Pad, Pond System and Pipeline Corridor
- Tailings/Mill Sands Storage Facility North and South
- Isocontainers parking yard on La Quinua Pad (by Logistics)

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- Environmental department.

The auditor reviewed and performed a follow up on inspection findings from documented inspections conducted by the Process Department in Carachugo 14 and the Mills Sands Storage facility for years 2019, 2020 and 2021. Corrective actions are documented in Cintellate software to ensure actions area appropriately managed and completed by the responsible parties. Corrective actions from daily inspections and maintenance activities are recorded via a Work Order to rectify the problem.

Yanacocha inspects unloading, storage, mixing, and process areas as required by this standard of practice, including non-destructive testing, documented weekly inspections, leach pad system (including the new Carachugo 14 facility), pipeline corridors, pond systems and impoundments. Inspections and subsequent corrective actions identified are documented including the nature and date of the corrective actions. The auditor reviewed inspections records covering the recertification period from year 2018 up to date in 2021 and found to be complying as they include the date of the inspection and the name of the responsible of the field inspection.


The auditor believes Yanacocha inspects cyanide facilities on an established frequency sufficient to assure that they are functioning within design parameters.

Yanacocha has developed (and keeps up to date) a program to manage all preventive maintenance (PM) tasks. PM schedules are generated in the SAP system which is then automatically issued at the prescribed date and/or frequency as a work order. Maintenance schedules are determined according to the level of risk associated with the equipment and/or manufacturer recommendations and specifications.

Yanacocha has showed evidence to have enough emergency power supply sources to operate pumps and prevent releases and exposures if by any situation its primary power source is interrupted. The auditor verified maintenance records for years 2019, 2020 and quarter 1 2021, for the following back up power generators:

- Oil Fluids Analysis by Ferreyros in all power generator set (every quarter)
- Weekly Start up tests for La Pajuela, la Quinoa Pumping Station and Carachugo Ponds
- Inspection forms every quarter at each power generator set.
- Annual Power Generation Reports (2018, 2019 and 2020) which includes the status of all generators.

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STANDARD OF PRACTICE 4.2

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

The operation is

- ☒ in full compliance with Standard of Practice 4.2
- ☐ in substantial compliance with
- ☐ not in compliance with

Yanacocha continues to implement strategies for optimizing cyanide addition and recovery in Yanacocha Norte and La Quinoa Leach Pads.

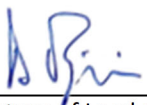
Regarding the new Carachugo 14 Leach Pad and Process ponds, the ore extracted is transitional, with higher copper and sulfur rates, which requires adjustments to increase lime and caustic soda addition to ensure cyanide concentrations are maintained according to the operational philosophy. The Cyanide Control Philosophy document has been designed for proper handling of the setting and control of cyanide addition rates, change management around modification of cyanide set points and control of the EWTP circuit.

The auditor verified that in 2020 and 2021, Yanacocha has had some scattered events of solution with pH below 9 and cyanide addition rates in Carachugo 14, that required average concentrations between 100 and 150 ppm free cyanide. The auditor also verified that corrective actions have been taken with a sense of urgency to optimize ore blending, pH controls and cyanide addition, which was verified by the auditors with pH and cyanide values at the Pampa Larga plant during May and June 2021.

Cyanide control strategy is based upon a series of test work and the recommendation from senior metallurgist. Yanacocha uses cyanide control on-line analyzers in Pampa Larga to measure free cyanide concentration providing periodic analysis for quick corrective actions.

Yanacocha uses different methods to control cyanide addition (automatic, remote manual and local manual controls) which are used to meet the control philosophy. Results from the daily cyanide concentration analyses were reviewed by the auditors in Carachugo 14 Leach Pad and Pampa Larga process plant and are a continuous strategy to control cyanide addition. The results are reviewed and if changes are needed then they are communicated to the process operator.

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STANDARD OF PRACTICE 4.3

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

The operation is ☒ in full compliance with Standard of Practice 4.3
☐ in substantial compliance with
☐ not in compliance with

Yanacocha has showed evidence of maintaining a robust probabilistic Water Balance model updated by WSP, which is a consulting firm who is currently providing consulting support and updates. The model uses the Goldsim software for Life-of-mine planning, environmental expansion permits, reporting and control. The Goldsim model is updated on a weekly report to management and calibrated on a monthly basis with on-site collected data.

The auditor also verified the probabilistic assumptions of the model by checking the input of historical and current meteorological data from stations located in La Quinua, Yanacocha, Carachugo and Maqui Maqui. The model uses estimates based on statistical analysis of reliable historical rainfall data.


Yanacocha conducts inspections and routine pond levels monitoring in operational ponds, minor events, and major events ponds for each leach Pad facility, and it does the same for the Tailings Storage Facility (TSF) in La Quinua. Plant operators and water management supervisors are responsible for conducting level checks in these areas and to maintain these records at site.

All Yanacocha pond systems at La Quinua, Yanacocha Norte, Carachugo 14 and Maqui Maqui have maintained engineering controls (water level sensors and records), water balance simulations, contingency plans operational levels and most important, constant supervision.

Yanacocha operates three Excess Water Treatment Plants (EWTP) that are designed to treat and release the positive water balance during the rainy season. The EWTP plants are commonly known as CN destruction plants with different primary and polishing treatment systems and a final stage of reverse osmosis. The water balance contemplates the effluent from each EWTP going to a series of ponds in each water basin before discharge to a compliance effluent point.

During the recertification period, there has not been any evidence of having the interconnected pond system reaching the red alert levels, however sporadic high levels above operational design level has been observed (mostly at the end of the rainy season) which triggered the solution flow management between ponds in La Quinua and Yanacocha Norte.

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STANDARD OF PRACTICE 4.4

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

The operation is ☒ in full compliance with Standard of Practice 4.4
☐ in substantial compliance with
☐ not in compliance with

All Leach Pad systems in Yanacocha (La Quinua, Yanacocha Norte, Carachugo and Maqui Maqui), consisting of pregnant solution ponds, minor events, and major events ponds were inspected during the audit. Other types of ponds were also inspected within the Leach Pads, raincoats system, leak detection systems, and the Mill Sands Storage facility.

Yanacocha continues to monitor weak acid dissociable (WAD) cyanide in all process ponds and supernatant of the tailings storage facility in La Quinua on a monthly basis. All CN WAD analytical results for pregnant solution ponds, tailings and contingency systems were reviewed for the recertification period (2018- up to date), and all pond systems has showed values below the 50 ppm WAD cyanide limit, except for some sporadic results on La Quinua Operations Pond.


The La Quinua 8 Pregnant Solution Operation Pond presented two values that roughly exceeded the 50 ppm CN WAD in year 2019, four values in 2020 and only one value roughly above the limit in 2021 (January). Yanacocha demonstrated that has kept the La Quinua 8 Operations pond protected for wildlife access with a highly effective bird balls layer on the pond, and adding extra hazing measures as automated canons, wildlife siren calls and scarecrows. The auditors verify that these systems have been in place and adequately maintained during the recertification period.

Yanacocha Operational and Environmental team have maintained an Inspection Plan on all process ponds at the facility and there have not been cyanide-related wildlife mortalities over the recertification period. The auditors had access to Yanacocha Incident data base over the last three years and found very sporadic wildlife reports, being the cause of death other than cyanide exposure.

Yanacocha applies cyanide solutions on all pads under the same method, which is the use of pumping center lines, raiser pipes, distribution lines to each leach zone and direct irrigation to ore surface by drip pipelines, which are small-perforated pipelines with a controlled irrigation rate. This practice prevents spraying or any runoff of solution on ramps.

Yanacocha leaching procedure covers the appropriate placing of ore by ripping of the surface to ensure adequate permeability and percolation. There is also a ponding procedure on leaching cells when ponding is observed and the measures to be taken to avoid it. If ponding is observed, the operator immediately notifies the supervisor and contact the control room to reduce the irrigation rate in those leaching cells.

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STANDARD OF PRACTICE 4.5

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

The operation is ☒ in full compliance with Standard of Practice 4.5
☐ in substantial compliance with
☐ not in compliance with

Yanacocha operates under a positive water balance, which is approved by a series of Environmental Impact Assessments and up-to-date sectorial water discharge permits which allows their different processes to have discharges to surface water. The operation has maintained during the recertification period, a robust system of excess water treatment plants to ensure compliance against the International Cyanide Management Code (ICMC) and the Peruvian regulations for effluent discharge and water quality in the receiving water bodies.

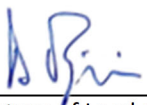
Yanacocha operates three Excess Water Treatment Plants (EWTP) located in Yanacocha Norte, Carachugo and La Quinoa. Treated water from each of these plants goes by a series of buffer and storage ponds before proceeding to a controlled end of pipe discharge from the pond system with all necessary water quality monitoring and reporting to local authorities. The auditor verified records for water quality data and official reports along the recertification period and confirmed compliance against local requirements, which are stringent than the ICMC's requirements.

Yanacocha's robust water treatment systems, together with a series of buffer and polishing ponds before discharge to surface water, has demonstrated throughout the recertification period, that their process operations are designed and operated to achieve compliance with the 0.022 mg/l free cyanide at specific downstream water basin compliance points denoted in the Environmental Monitoring Plan.

The auditor reviewed data of water quality points downstream of the operation and in all cases the data showed WAD CN levels < 0.002 mg/l (non-detectable).

Yanacocha has not had any indirect discharges to surface water, however, underground water quality monitoring in water basins downstream of all Yanacocha operations showed no detectable cyanide.

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STANDARD OF PRACTICE 4.6

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

The operation is ☒ in full compliance with Standard of Practice 4.6
☐ in substantial compliance with
☐ not in compliance with

Yanacocha maintains water management measures on all inactive and active Leach Pads, based on low-permeability compacted soil layer underlying geomembrane liners. These engineering controls also apply to the Gold Mill Sands Storage Facility (North and South) in La Quinoa Pad.

All process operations ponds at La Quinoa, Yanacocha Norte, Carachugo and Maqui Maqui have designed with triple-lines geomembrane and leak detection and recovery systems (LCRS). The major and minor events ponds have double-lined geomembrane installed and with an interlayer LCRS.

A series of twenty-four (24) seepage groundwater monitoring wells downgradient of Yanacocha operation and located in the four different water basins are installed and maintained. These wells are reported to the Peruvian authorities; however, Peru has not established regulatory requirements for ground water quality. These results are compared to national water quality standards only as a reference. The standard used for comparison is the local regulations for water quality standards (ECA) Class III (irrigation and livestock) for surface water, which is 0.1 mg/L WAD Cyanide.

Yanacocha has not caused cyanide concentrations in groundwater to rise above levels protective of this standard. Peru has not established regulatory numerical groundwater quality standards for cyanide nor beneficial uses of groundwater beneath and/or immediately downgradient of the Yanacocha Mine.

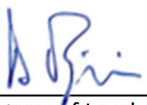
STANDARD OF PRACTICE 4.7

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

The operation is ☒ in full compliance with Standard of Practice 4.7
☐ in substantial compliance with
☐ not in compliance with

Yanacocha has maintained all tanks used for mixing, storing, and/or processing of cyanide and/or cyanide solutions with adequate secondary containment. Level indication, operator inspections, secondary

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containment and sump pumps help to prevent releases to the environment. These includes tanks at La Quinua, Yanacocha Norte, Gold Mill, Pampa Larga and Maqui Maqui process plants.

All tanks at Yanacocha's La Quinua, Pampa Larga, Yanacocha Norte and the inactive Maqui Maqui and Gold Mill plants, were designed with adequate storage to contain at least 110% the capacity of the largest tank in the bunded area plus additional capacity for the design storm event.

All four Process Plants at Yanacocha are contained within a concrete pad, including the sparge area and process solution tanks surrounded by containment walls, providing a competent barrier to seepage. Process plants also have an emergency pond in case of major spills.

The auditors visited all plants in Yanacocha: Pampa Larga, Yanacocha Norte, La Quinua, Gold Mill and Maqui Maqui, even though the last two are currently not in operation. The mixing and storage tanks, are secured to solid, reinforced concrete foundations, which prevents any seepage from the tank bottoms from entering the ground

Yanacocha has put in operation (2019) the Carachugo 14 Leach Pad area and solution storage system. This new pregnant solution system has also a concrete yard to hold pumps, a day tank and a transfer tank connected to a solution pipeline that sends pregnant solution to the Pampa Larga process plant for gold recovery. The auditors verified the engineering design of the secondary contention system with has enough capacity to hold 110% capacity of the largest tank, plus a connection back to the operations pregnant solution pond.

Yanacocha has maintained a series of spill prevention and containment measures for cyanide pipelines including secondary containments, routine inspections and preventative maintenance. Pipelines within the Pampa Larga, Yanacocha Norte, Gold Mill and La Quinua are located withing secondary containment. In some areas where pipelines are on top of natural ground, the pipelines have been protected with a pipe-in-pipe configuration, as observed in Maqui Maqui, La Quinua Pre-Soak circuit, Gold Mill pipe coming from La Quinua.

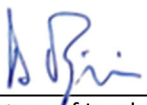
Pipeline corridors transferring solution from pad and plants are all within geomembrane-lines channels. The auditors observed flange covers used to minimize the impacts from any spray that may occur on high-risk pipelines.

Yanacocha has in place a "Cyanide Spill Management in the Process Plant" which includes actions includes actions of what to do in case of major process spillage out of containment that reports to the emergency pond. Yanacocha has also implemented emergency procedures for potential spill events in the interconnected process solutions pipelines and channels.

Routine inspections are conducted on a per shift basis to identity and report any leaks and or damage to containment structures. These routine inspections are supported by scheduled preventative maintenance on spill prevention and leak detection equipment.

The auditors verified that Yanacocha has maintained this best practice for the new pipelines associated with the Carachugo 14 Leach Pad and solution management ponds, which includes transferring pregnant solution to the Pampa Larga Plant through a geomembrane lined channel.

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Yanacocha has several risk evaluations processes that include a 5 by 5 risk matrix to identify potential cyanide related effects in their operations, and evidence of conducting a Hazard and operability (Hazop) evaluation for the new Carachugo 14 Leach Pad and solution management system (operation pond, major events, and minor events ponds).

The new Carachugo 14 tanks systems for the leach pad and pregnant solution process ponds sent to Pampa Larga has been designed and constructed using carbon steel materials which are compatible with site's cyanide and pH conditions.

Finally, the auditor verified that all process tanks and pipelines located in Pampa Larga, Yanacocha Norte, Gold Mill and La Quinoa were constructed of materials compatible with cyanide and high pH conditions.

STANDARD OF PRACTICE 4.8

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

The operation is ☒ in full compliance with Standard of Practice 4.8
☐ in substantial compliance with
☐ not in compliance with


Quality assurance and quality control (QA/QC) practices were implemented for new facilities constructed during this recertification period:

- Carachugo 14 Leach Pad
- Carachugo 14 Process Operation Pond
- Carachugo 14 major Events and minor events ponds
- Carachugo 14 day tank transfer tank
- Pregnant solution pipeline from Carachugo 14 to Pampa Larga Plant

The engineering manual for all new facilities in Carachugo 14 were reviewed and the auditor confirmed an appropriate QA/QC process. The auditor confirmed records of the QA/QC programs in electronic versions. A listing of material types to be used and minimum design/operating requirements was provided in the electronic package including the QA/QC documentation with sign-off approvals from authorized personnel.

Records of QA/QC documentation are maintained by the document control in an Engineering Electronic Manual. The electronic files including QA/QC records for the cyanide facilities were reviewed by the auditor in electronic versions.

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The auditors received a temporary access of all engineering package for Carachugo 14 on the intranet, verifying compliance against this requirement.

For all other existing facilities, Yanacocha keeps records of construction reports, including as-built drawings for all plants, Gold Mill Sands storage facility, which were found in compliance during the initial certification audit.

STANDARD OF PRACTICE 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 with Standard of Practice 4.9
☐ in substantial compliance with
☐ not in compliance with


Yanacocha Environmental Department has developed and implemented an Environmental Monitoring Plan and series of procedures which provide the framework for monitoring activities. These procedures cover the monitoring activities for the evaluation of possible effects from cyanide use on wildlife, surface water and ground water.

Sampling protocols developed for the site are based on a Corporate Monitoring and Measurement Standard and the Peruvian National Water Authority Water Monitoring Protocol. The development, review and approval involve personnel with experience on water monitoring, sampling and analysis that are part of the Environmental Department in coordination with personnel from the ALS Peru Laboratory, with which Yanacocha maintains a service contract (2018-2021).

The auditor verified that Yanacocha maintains an annual Environmental Monitoring Schedule, which includes activities for monitoring activities including groundwater, surface water, process solution and wildlife which includes type and location of sampling, frequency of samples, cyanide species to be analyzed. Monitoring weekly work plans are also developed that provide more detail on the activities to be conducted, including monitoring for CN species in mill event pond, TSF, surface waters and groundwater.

Yanacocha has an up-to-date Monitoring of Water and Soil Procedure that presents the requirements for documenting sampling conditions and procedures. Yanacocha enters comprehensive information for sampling events, including field data, into the system. During this 2021 ICMC recertification audit, field data records (multiparameter equipment) were reviewed, and include sample date and time, conductivity, pH, total suspended solids, total dissolved solids, dissolved oxygen, temperature, and flow rate if applicable. Records of

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these forms are maintained by the Environmental Department and were reviewed by the auditor confirming compliance.

The environmental team in Yanacocha monitors for possible surface and groundwater discharges and associated impacts both upstream and downstream of the four different water basins surrounding the site. Monitoring and compliance points have been established in accordance with regulatory requirements and are sampled on a regular basis according to the plan. This work is completed by the environmental team with monitoring records logged in the site environmental monitoring database.

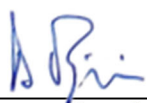
In accordance with the recently updated Biodiversity Management and Protection Procedure YAN-ENV-SOP-1206, Yanacocha employees and contractors are responsible for identifying the presence of wildlife during routine operational inspections and for contacting the EHS Department regarding any environmental incidents affecting wildlife or when wildlife may require special handling or monitoring.

The Process department conducts wildlife inspections every shift and the Environmental department conducts inspections on a weekly basis. The auditor verified completed checklists for the last three years, which includes wildlife observations in the various process areas.

The environmental monitoring frequencies at Yanacocha are based upon risks, legal requirements, permits, engineering controls and process solutions management. Routine daily inspections occur throughout each plant to identify any possible upset conditions which may require immediate and/or emergency monitoring outside of normal monitoring periods.

The auditor believes Yanacocha maintains a Monitoring Plan conducted at frequencies adequate to characterize the medium being monitored and to identify changes and trends in a timely manner.

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PRINCIPLE 5 - DECOMMISSIONING

Protect communities and the environment from cyanide

STANDARD 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 with Standard of Practice 5.1
- ☐ in substantial compliance with
- ☐ not in compliance with

Yanacocha has developed a Mine Closure Plan for the entire site according to local regulation and also has the Methodologic Guide for Mine Closure. The plan reviewed during the audit was the third update approved by Peruvian authorities in March 2021. Yanacocha has updated this plan over the years to incorporate new facilities and as necessary to fulfill regulatory requirements. The most current version of this plan provides the up to date cost estimate for closure activities. The Mine Closure Plan describes specific temporary, progressive and final closure plans for closure and reclamation of the entire mine including processing facilities, waste management facilities, water management facilities, mining facilities, and ancillary facilities.

The primary components covered under final closure include closure of roads; abandonment of wells; rehabilitation of pits; quarries and trenches; closure of ponds and water reservoirs; treatment/management of heap leach pad water and pit water; closure and rehabilitation of the heap leach pads; demolition and removal of industrial installations; and post-closure monitoring. These activities include dismantling; demolition, recovery and disposal; physical, geochemical and hydrologic stabilization; rehabilitation of the land and habitats; revegetation; and implementation of related social programs. The Mine Closure Plan describes specific closure activities for the decommissioning of the cyanide facilities including decontamination, demolition and disposal of process and water handling facilities including all pipes, liners, ponds, concrete containments and tanks. Also includes physical and geochemical stabilization of heap leach pads, water treatment of leach and process solutions, and post-closure monitoring.

Yanacocha developed supplemental reports to provide detailed evaluation and costing for the dismantling, decommissioning and decontamination of cyanide facilities. The report titled "General Scope for the Dismantling, Decommissioning and Decontamination Plan" covers decommissioning activities for process infrastructure (e.g., tanks, pipes, equipment, etc.) but excludes the heap leach pads and pond facilities.

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A conceptual decommissioning schedule has been developed with tentative timeframes and activities associated with decommissioning activities. These activities are developed and updated according changes to the facilities and updates are made to the schedule to reflect any impacts including duration and sequencing. The Mine Closure Plan has implementation schedules for closure activities. In general terms, implementation schedules are provided for progressive closure (closure and reclamation activities completed while operating), final closure (decommissioning, water treatment and final reclamation), and post-closure (water treatment, maintenance and monitoring) phases.

Yanacocha has updated the Mine Closure Plan over the years to incorporate new facilities, and as necessary, to fulfill regulatory requirements. According to local regulations, the plan must be updated every 5 years or when significant changes are made in the mine site. The most current version of this plan provides the up to date cost estimate for closure activities. Additionally, Newmont internally requires annual updates for consistency with planning, which include a cost estimate for Asset Retirement Obligations reporting and financial audits.

STANDARD OF PRACTICE 5.2

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

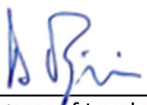
The operation is ☒ in full compliance with Standard of Practice 5.2
☐ in substantial compliance with
☐ not in compliance with

The Mine Closure Plan outline the cost for full implementation of the site-wide closure and reclamation plan for the current and planned facilities and activities, inclusive of cyanide facilities. Facility demolition is a percentage of the installation cost. Earth works are referenced on the mine fleet cost. These costs are reviewed on an annual basis and updates are made as required to cost estimates.

Interviews with Yanacocha's personnel indicated that cost factors are applied to direct costs to account for a third-party contractor implementation of the closure. As verification, the auditor confirmed that these add-on costs are included in the cost tables for the Mine Closure Plan.

Yanacocha has updated the Mine Closure Plan over the years to incorporate new facilities, and as necessary, to fulfill regulatory requirements. The most current version of this plan, approved by the local regulatory authorities on from March 2021,, provides the up to date cost estimate for closure activities. Yanacocha is required to update its closure and reclamation plan every five years as a regulatory requirement. Additionally, Newmont

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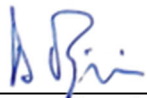
internally requires annual updates for consistency with mine planning, which include a cost estimate for Asset Retirement Obligations reporting and financial audits.

Yanacocha has established a financial mechanism approved by the applicable jurisdiction to cover the estimated costs for cyanide - related decommissioning activities as identified in its decommissioning and closure strategy. The most current version of the Mine Closure Plan provides the up to date cost estimate for closure activities. The cost schedule provides estimated financial guarantee amounts that Yanacocha must meet each year. Yanacocha posted letters of guarantee, the approved financial mechanism, to cover the estimated costs.

Yanacocha has established approved financial mechanisms to cover the estimated costs as required by local regulations.

Yanacocha no longer has a self- guaranteed mechanism in place. Yanacocha has established approved financial mechanisms to cover the estimated costs as required by local regulations of the Energy and Mines Ministry (MEM).

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PRINCIPLE 6 - WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

STANDARD OF PRACTICE 6.1

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

The operation is

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

Yanacocha has developed numerous procedures (SOPs) for cyanide-related activities which cover all activities related to cyanide management at the process plants, leach pads, ponds and pumping stations. The SOPs cover cyanide mixing, plant operations, confined spaces, decontamination, and many other cyanide-related activities. For more general activities which apply across various areas of the plant and/or the mine operation, work permit systems have been developed. These include, for example, lock out/ tag out, hot work and confined space entry permits.


For the plant operations, multiple plans and procedures have been developed and implemented for the different areas of operation that involve cyanide solutions greater than 0.5 mg/L WAD cyanide, as grinding and milling, heap leaching and associated pumps/pipelines and secondary containment, ponds and associated leak detection, plant processing carbon in columns (CIC), tailings management, treatment (reverse osmosis and chlorination), regeneration (acidification, volatilization, and neutralization [AVR]), sulfurization, acidification, recirculation, and thickening (SART).

Yanacocha also has developed formal management systems covering preventative maintenance (SAP software), general risk management procedures and loss prevention, and emergency management. Confined space entry is addressed in SOP PP-E 40.02 Confined Spaces procedure and the form to authorize work in confined spaces.

Decontamination is addressed in SOP PMA-M01-P05 Equipment Decontamination for Maintenance Work.

Site operational SOPs are derived from the risk assessment process called IPERC (*Hazard Identification, Risk Assessment and Controls*). The SOP PP-E 15.01 risk assessment and change management is applied by operational area managers to all routine and non-routine activities which are under their responsibility before they are executed. The risk assessment results are entered into the relevant operational area risk register. The risk assessment procedure requires a team-based process to assess task activities in a structured way. Where risk

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levels are determined to be unacceptable, the hierarchy of controls is utilized to ensure personal safety. SOPs are updated as necessary based on the results of the risk assessment.

The procedures detail task specific requirements, minimum training requirements to conduct the task, and procedures to follow in case of a contingency. Verification of the written procedures included review of the specific task, plans and worker interviews. Procedures were found to be sufficiently detailed to enable safe operation and to minimize worker exposure.

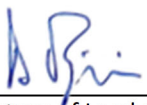
Yanacocha procedures provide line item listings of requisite personal protective equipment (PPE) to prevent and/or minimize worker exposure to cyanide and/or cyanide containing solution. Section 5.0 of all procedures addresses the selection and use of proper PPE. In addition Yanacocha has the specific SOP 18.01 E-PP "Personal protective equipment" where it details the type and standard of protective equipment required for each type of work, including inspections to detect sign of wear and tear to replace the PPE. During the site visit the auditors checked that in areas where cyanide is present the operation has signs listing the PPE requirements. In addition, the cyanide training materials contain information on PPE requirements. Also, during the site visit, the auditors observed that Yanacocha personnel used the PPE as prescribed by the procedures.

The level of PPE is increased for tasks involving cyanide, including pre-start checks. During pre-start checks, operators are required to identify whether they have the requisite PPE to perform the task at hand and/or identify any upset conditions which may require additional precautionary measures. In situations where the task is non-routine, a job hazard analysis may be required to identify any risks associated with the work and ensure that adequate PPE is provided to complete the work safely. The hazards associated with the task and the PPE required form an integral part of the procedures. The auditors observed that operators wore the appropriate PPE for the tasks. Observations during the audit confirmed that hard hat, rubber boots, rubber gloves, chemical suits, face shields, handheld two way radio, and HCN monitors were in use for tasks that were performed at the cyanide sparge/mix area.

Yanacocha has implemented a Change Management Procedure to manage changes to facilities, procedures or equipment and ensure that these changes do not adversely impact on health and safety, among others. The procedure includes a section on Health & Safety related risks and requires review and sign-off by health, safety and environmental supervisors. Operational personnel helps to identify now changes to a facility or its operating practices may increase cyanide exposure risks and provides a chance to evaluated, address and implement effective change management.

A review of change management examples and interviews with personnel confirmed Yanacocha is using the change management process and that the process allowed for proposed changes to be reviewed for their potential impacts on the environment and worker health and safety by appropriate supervisors. The auditors reviewed completed change management forms, to verify compliance throughout the recertification period.

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Workers at the operation are given the opportunity to provide input to procedures via a variety of mechanisms including pre-shift meetings. Comments for improvement are directed to supervisors and/or management for consideration. New and revised documents go through a review procedure which may include feedback from area operators with significant experience in that area. Comments are incorporated and then updated procedures are disseminated to the supervisors for review with the crew for final review and implementation.

Yanacocha solicits and considers the workers input in developing and evaluating health and safety procedures through several means as monthly HSE (Health Safety and Environmental) area meetings where all workers participate and discuss health and safety issues related to new task-specific or procedural changes. Also have the HSE Committee meetings where the HSE Committee meet on a monthly basis to represent employees and discuss issues of health and safety. There are weekly HSE meetings for supervisors where workers review the HSE statistics, and if necessary, propose modifications / improvements to written work procedures, as stated by the EHS Superintendent.

Every day workers have daily 5-minute meetings to discuss health and safety matters at all process areas of the mine. The meetings are conducted at the beginning of each shift, with both shifts (day and night) in attendance. During this meeting any hazards reported the previous day are discussed and an opportunity for attendees to raise any additionally issues is provided, including procedural changes. The auditors reviewed examples of these meetings records including examples concerning cyanide management and exposure. The auditors also reviewed the monthly HSE Committee minutes covering the 3-year audit period.

STANDARD OF PRACTICE 6.2

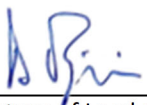
Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

The operation is ☒ in full compliance with Standard of Practice 6.2
☐ in substantial compliance with
☐ not in compliance with

The operation has determined the appropriate pH for limiting the evolution of HCN gas during mixing and production activities for its process plants. The operational areas have determined specific pH set point to be 10 or greater as indicated in the respective plant SOP for cyanide solution preparation.

Yanacocha monitors the solution pH with in-line pH meters located at the operational areas. The in-line pH meters report to the control rooms, but can also be read manually at their locations. The in-line meters are calibrated periodically. For each operation the pH is measured automatically at key locations within the

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processing circuits and the results are displayed to operators via the distributed control system (DCS) at each process plant. Manual checks are conducted by operators as a check against the automatic monitors.

The auditors reviewed examples of the results recorded on daily operator log sheets covering the 3-year audit period that show the pH has been maintained above a value of 10 as recommended in the operating procedures. The auditors reviewed calibration records for the pH meters to verify that Yanacocha has maintained them in proper working order throughout the recertification period.

Yanacocha uses fixed and portable monitoring devices to confirm that controls are adequate to limit worker exposure to hydrogen cyanide. HCN alarms are set to visually and sound alert operators at 4.7 ppm and 10 ppm. The alarm for 4.7 ppm activates a flashing strobe locally and an alarm shows in the control room alerting of possible high HCN gas in the area. At the activation of the alarm at 4.7 ppm, personnel must immediately leave the area until the area is safe to resume work and the alarm is reset. Although HCN detectors alarms are set at 4.7 and 10.0 ppm, all actions as evacuate the area, are set for the low level first alarm; the higher alarm triggering at 10 ppm will find all personnel out of the area evaluating the situation. Overall fixed HCN (Toxgard) detectors are installed at potentially high risk areas to alert personnel of possible HCN gas exposure. The detectors are monitored continuously from the process plant control room. Alarm thresholds (4.7 ppm & 10 ppm) are hardcoded in the Programmable Logic Controller (PLC). These alarm thresholds will trigger an alarm in the control room.

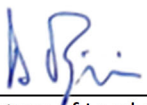
The fixed HCN monitors are located at the cyanide mixing areas, carbon plants, and Merrill Crowe systems. Within each process area a risk assessment was undertaken to identify high risk areas where workers have the potential to be exposed to HCN gas which was then used to select the number and location of fixed HCN monitors. The auditors reviewed maps for each processing area highlighting the areas and activities where workers may be exposed to cyanide.

In addition to the fixed gas monitors, Yanacocha employs personal HCN gas monitors for operators in high risk areas. Personal HCN monitors have identical alarm thresholds as fixed HCN gas detectors. Operators and maintenance personnel were observed using these monitors throughout the audit.

Yanacocha has established a number of high risk areas where exposure to HCN gas may occur according to the Code requirements, including areas within the cyanide mixing areas, carbon plants, Merrill Crowe systems and refinery areas. In 2010 Yanacocha undertook a risk assessment to identify high risk areas where workers have the potential to be exposed to HCN gas which was then used to select the number and location of fixed HCN monitors and then in 2014 updated this evaluation. Maps for each processing area were viewed highlighting the areas and activities where workers may be exposed to cyanide.

Signage, procedures and training developed by the process plants help to ensure that workers understand the high risk areas and the alarm responses requirements. Process plants personnel are responsible for ensuring that adequate levels of signage and alarms are maintained throughout the plant to protect against HCN exposures.

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Workers are required to wear personal HCN monitors at those areas. Work procedures have been developed for all activities in which cyanide management is involved. These procedures include a section where the Personal Protection Equipment (PPE) requirements are listed. Signage listing the PPE requirements to enter a cyanide facility has been installed at appropriate entrances.

HCN fixed and portable monitors are calibrated on a regular basis and records are kept for at least one year. The mine calibrates and maintains fixed monitors every 6 months according to frequency and instruction of the manufacturer. Portable monitors are sent to the supplier for maintenance and calibration according to schedule; the supplier delivers a certificate.

Records of tests and calibration activities both for fixed and portable HCN gas monitors were available for the auditors' review covering the recertification period.

Signage is displayed at the plants entrances and throughout the various facilities to alert personnel to the presence and/or possible presence of cyanide, access restrictions and the requisite PPE for the area. In addition to identification of cyanide areas and PPE requirements, signage is also used to restrict eating, drinking, smoking and open flames to authorized areas only.

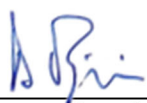
Warning signs are posted in Spanish, the language of the workforce. Verification was through visual inspection of the signs. located in areas where cyanide is present.

High strength cyanide solution is dyed in red color for clear identification. Dye is sent with the cyanide briquettes inside the isotanks so that at the sparging operation, the high strength cyanide solution results colored in red.

Yanacocha process plants area equipped with a number of fixed and portable safety showers/eyewashes to provide emergency rinsing in the event of chemical exposure, installed at strategic locations throughout the operation in all areas where there is a potential for exposure to cyanide. Safety showers and eyewashes are checked as part of daily inspection checklists to ensure that they are operational and that water streams and flows are adequate. This process of testing the shower and eye-wash station prior to commencing work was observed during the audit. The auditors randomly checked showers and eyewashes during the site tour to verify functionality. In addition to the daily checks, routine preventative maintenance on the showers is completed by the process maintenance personnel no less than quarterly.

To protect against fire, dry chemical powder fire extinguishers are used in the plant to prevent generation of HCN gas whilst extinguishing a fire. These extinguishers are checked as part of the daily inspections by the area operators. In addition, the Health & Safety team is responsible for routine inspections and replacement of undercharged or faulty extinguishers. The auditors randomly checked fire extinguishers to confirm they are an acceptable type for use with cyanide. Verification was also conducted by reviewing Yanacocha's inspection and

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testing records for showers, eye wash stations and fire extinguishers and records of annual fire extinguishers inspections and maintenance.

Pipelines and tanks that contain cyanide or cyanide solution are labeled to enable plant personnel to identify the contents. Likewise, pipelines with high-strength cyanide solution between the distribution tanks and the plants are properly labelled with their contents and direction of flow to allow personnel to understand the flow and possible exposures and/or response requirements for leaks and/or maintenance work. Pipelines to and from the pads are also labelled as containing cyanide with the direction of flow.

The site inspection showed that cyanide lines were painted purple, contained a process description such as barren solution and had the direction of flow indicated. Those lines containing high concentration of cyanide area, in addition are labelled with a red dot. In some instances, the entire lengths were not painted or labeled, however it was possible to ascertain the contents by tracing the line a short distance.

All tanks containing cyanide solution were labeled with a tank number and labelled as to its contents or use. Verification was by visual inspection. Storage and preparation areas, process tanks and piping containing cyanide are properly identified to alert workers of their contents.

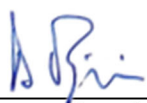
Yanacocha maintains Safety Data Sheets (SDS) for all chemicals on site inclusive of sodium cyanide. Hard copy documents and/or permanent stands are maintained locally for bulk chemical storage areas such as the cyanide offloading and storage areas. First aid instructions for cyanide exposure are located in each first aid kit/emergency response cabinet, which are placed in areas where reagent grade cyanide is handled and in the process control room. SDS are located in cabinets near them. In addition to the SDS sheets, signage is available to alert personnel to chemicals and required emergency response requirements in the high risk cyanide areas. All materials are written in Spanish, the language of the workforce.

Hazard maps are published at each process plant indicating the location of the first aid kits. The presence of first aid procedures and the SDS sheets were confirmed during the auditors' site inspection. The auditors also observed that SDSs were present in the control rooms and were available in the clinics and ambulances.

Yanacocha provides an induction on cyanide safety to the entire workforce, contractors and visitors before being allowed to work or visit the project. The auditors received a short induction on cyanide safety before the site inspection.

Yanacocha has developed and implemented written procedures for investigation of incidents, non-conformities, corrective actions, and preventative actions, both for H&S and environmental events. The procedures apply to all mine workers as well as to contractors. They are applicable to all types of incidents, including cyanide-related incidents. Yanacocha has an incident investigation procedure that is used to guide the incident reporting and investigation process for health and safety incidents.

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An additional procedure is used for environmental incidents. The Environmental incidents procedure describes a system to be used to classify an environmental incident based on potential physical, biological, legal and social impacts and consequences that an environmental incident may generate. The risk level assigned determines the level of detail required in the investigation. This procedure defines clear lines of responsibility for reporting and remediating an environmental incident.

Yanacocha reported 3 cyanide-related incidents during the audit 3-year period, all related to environmental release, none related to cyanide exposure incidents. On September 2018 a spill in contained area was reported in Level 0 at the Goldmill. On February 2019 a spill was reported in Pampa Larga. On December 2020 was reported other spill at Pampa Larga due to an energy blackout, resulting in a spill of 500 liters of barren solution with 2.14 ppm WAD cyanide concentration through a 2" pipeline.

The auditors confirmed that incidents are being investigated by review of investigation reports for the cyanide-related incidents that occurred in the 3-year recertification period. The investigation reports indicated that follow-up preventative actions included adjustment of maintenance procedures when applicable. The auditor reviewed the incident report documents in Sentinel Platform with detailed information.

STANDARD OF PRACTICE 6.3

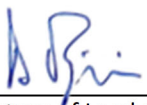
Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide

The operation is ☒ in full compliance with Standard of Practice 6.3
☐ in substantial compliance with
☐ not in compliance with

Yanacocha has made available water, oxygen, resuscitators, radios, telephones, and alarms in the process plant and clinic. Oxygen bottles, resuscitators and first aid kits are located throughout all the places at the process plants where cyanide in reagent grade is present and at the mine's medical facilities.

Emergency cabinets are located at each facility near the unloading and mixing areas. They contain an oxygen cylinder and valved mouthpiece, amyl nitrite inhalant, drinking water and glass, and the procedure to use the equipment for first aid. Cyanide antidote kits are at the medicals centers (hydroxycobalamin)). The auditors confirmed that the antidote kits are stored at the correct temperature and that the antidotes have not expired. There are also resuscitators (defibrillators) and oxygen located at the onsite medical facilities and ambulances at the km 24 camp, km 37 camp, La Quinua Complex, Yanacocha Norte Plant, Pampa Larga Plant, km 52 (Conga) camp, and the China Linda (the lime plant).

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All supervisors have immediate access to radios and telephones while operators work in pairs. Depending on the task performed, operators may be issued with radios for the duration of the task. Control room operators have access to a public announcement system covering the process areas and surrounding buildings and general alarm system.

Yanacocha regularly inspects the cyanide first aid equipment's to make sure it is available and when needed. Yanacocha inspects the cyanide kits, the emergency equipment, and the ambulances regularly to ensure that equipment and supplies are present and functioning. Both H&S personnel and plant operators inspect the cyanide antidote kits and oxygen cylinders at the process plants, and document these inspections for emergency cabinets and cyanide antidotes. Emergency response cabinets, including cyanide antidote kits, are periodically inspected.

Antidote expiration dates and oxygen tank pressures were checked during the audit. All antidote kits were within expiration date and oxygen tanks were fully pressurized. Verification was through visual examination of the antidote kits expiration dates, interviews with process personnel and onsite doctor and nurse, and review of inspection records. The medical personnel inspect the ambulances and their contents on a weekly basis using a checklist. The auditors inspected an ambulance to ensure that they started, gas tanks were full, sirens/horns/lights worked, radios functioned, and emergency equipment was present and in good condition.

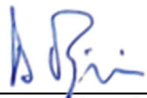
Before any cyanide unloading and mixing activities occur, the operator checks the first aid and cyanide antidote kits. The auditors reviewed the operator checklists located at the process areas.

The emergency brigade leader inspects the emergency response equipment monthly. The inspections cover Tyvek suits, firefighting suites, fully encapsulated suits, rubber boots/gloves, face shields, fall harnesses, traffic cones, shovels, spill cleanup kits, and decontamination supplies.

Yanacocha has developed the specific procedure to respond to cyanide exposure "Treatment for cyanide poisoning" to guide the first aid for cyanide exposure victims. The procedure covers the steps to follow for cyanide ingestion, eye contact, skin contact, and inhalation. The procedure describes in detail what is to be done in the event of a cyanide exposure. It includes personnel responsibilities, intoxication levels, first aid procedure, and medical attention. The first responder in the place initially will aid the victim securing the area and administrating oxygen, then will come the Emergency Response Team (ERT). Specific instructions are given for treating victims who are exposed to sodium cyanide via inhalation, ingestion, and dermal routes. Instructions detail the steps to be taken for conscious versus unconscious victims. Then the medical services will receive the victim decontaminated by the ERT to receive treatment, if necessary.

Yanacocha has onsite capability to respond with first aid and medical assistance to cyanide exposures. With respect to equipment, Yanacocha has seven medical centers attending emergencies 24 hours per day and one for 10 hours per day Monday to Friday. If transfer to a hospital for intensive medical care is needed, Yanacocha has a specialized medical care unit (UCE) available at Limatambo Clinic, approximately 45 minutes from the mine.

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Yanacocha has six ambulances 24 hours per day at the mine site, eight resuscitators (defibrillators) distributed among their medical centers and ambulances, an electrocardiograph, a mechanical blowhole, a rescue truck and a fire truck for the brigades. The auditors reviewed examples of the maintenance records for medical equipment including defibrillators (resuscitators), electrocardiograph, mechanical blowhole and checklists of ambulance operation covering the 3-year audit period.

Equipment for the brigades and first responders includes Tyvek suits, firefighting suits, fully encapsulated suits, SCBAs, rubber boots/gloves, face shields, fall harnesses, traffic cones, shovels, spill cleanup kits, decontamination supplies, spray washers and air compressors.

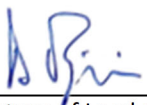
In terms of staffing, Yanacocha clinics are staffed with one doctor and one nurse on day shift and a clinic technician on night shift. The doctor resides at the La Quinoa medical center. The clinic technician role is to assist in the clinic and drive the ambulance. The clinic staff is engaged by Plan Vital under contract to Yanacocha. In addition to treating workers, the doctors and nurses actively train staff in first response capabilities. Every process shift has a first responder trained to administer amyl nitrite and oxygen at each process area. Only on-site medical professionals are expected to administer the hydroxycobalamin cyanide antidote.

The procedure “Medical transfers from level I to level II specialized health care” describe the actions to transfer patients from site to offsite medical treatment facilities at Cajamarca. Plan Vital, Yanacocha’s subcontractor, also has its own procedures for patient transfer. Yanacocha has a contract with Plan Vital for evacuation service and onsite medical service. Yanacocha also has a contract with the Limatambo Clinic to assist workers exposed to cyanide. In case of an emergency, Plan Vital will provide an evacuation service using a Yanacocha ambulance. Specialist staff from Plan Vital will accompany the worker exposed to cyanide to Limatambo Clinic for intensive medical care in the specialized medical care unit (UCE) in Cajamarca, located less than one hour away. Yanacocha maintains six ambulances which are available for transporting patients where required. The clinic technicians double as ambulance drivers.

Yanacocha has formalized arrangements with the local hospital, Limatambo Clinic via Plan Vital. These providers are aware of the potential need to treat patients for cyanide exposure. The operation is confident that the medical facilities have adequate, qualified staff as they have been trained by Yanacocha’s medical personnel, and is confident about its equipment and expertise to respond to cyanide exposures. The auditors reviewed the contracts with Limatambo Clinic and Plan Vital to verify compliance.

Cyanide related mock drills are held every year to test the emergency response capabilities of process plant and emergency response personnel including the provision of first aid. These drills test the capabilities of various types of emergencies including both cyanide exposure and environmental spillages across the complete response chain. Drills for other identified emergency events are also completed on a routine basis to maintain an adequate level of emergency response preparedness. Due to COVID-19 local regulation restrictions for mock

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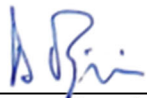
drills, Yanacocha performed 2 mock emergency drills related to cyanide during the 3-year audit period to test response procedures for various cyanide exposure scenarios.

The auditors reviewed the reports of the drills and scenarios that were completed during the audit period. On September 5, 2018 an emergency mock drill was performed at Pampa Larga process plant simulating a cyanide exposure Level II, which is a "Medium Level" emergency that cannot be handled by the personnel of the affected area, requiring the intervention of the Emergency Response Team.

On June 5, 2019 the Process Area performed a mock drill simulating an emergency rescue to 2 workers intoxicated with cyanide (unconscious) during a cyanide spillage.

Corrective actions were identified during each mock drill and incorporated into response planning. The procedure ERP-20.01 Drills Procedure and Annual Plan requires that a meeting is held following each drill to review the performance. Verification was through interviews with the H&S Superintendent and review of reports showing records and photos of mock cyanide drill.

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PRINCIPLE 7 - EMERGENCY RESPONSE

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

STANDARD OF PRACTICE 7.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is

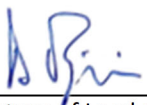
- ☒ in full compliance with Standard of Practice 7.1
- ☐ in substantial compliance with
- ☐ not in compliance with

Yanacocha has developed and implemented a plan titled “Preparedness Plan and Emergency Response”, which is a compendium of emergency response plans to facilitate the flow of information, support, and assistance during emergencies including accidental releases of cyanide at the mine or during transportation. At a corporate level, Yanacocha has implemented Newmont’s Rapid Response System (RRS). The RRS aims to mitigate and prevent the escalation of adverse consequences in the event that existing risk management controls fail. When an incident or issue occurs that can have the potential to seriously threaten Newmont’s operations, reputation and the safety and well-being of its employees a decision is made by the Site Emergency Controller whether to implement the RRS.

The Yanacocha Emergency Response Plan (ERP) contains guidelines and policies established to preserve the safety of employees. This plan deals with the general information for the coordination of emergency responses including the types of emergencies, communication flowcharts, responsibilities, and response team structures. The emergency response procedures in the ERP have been prepared for different scenarios: management of a fire, hazardous material, medical, rescue, or other emergency incident.

Yanacocha has also developed several plans and manuals that supplement the ERP, among them a HSE Manual and spill handling procedures. Among other plans are the “Contingency Plan for Cyanide Transport between km 0, 42 and 64. These are control points carried out by Engineering Services contractor, where the valves of the isotanks are checked, if the transporter carries cyanide antidote and satellite phone. Another is the “Contingency Plan for Solution Overflows in Ponds), another is the “Heap Leach Contingency Plan”. There are also emergency response actions in the “Health and Safety Manual”, which includes management and treatment in case of exposure to cyanide.

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The ERP and associated documentation considers a number of cyanide failure scenarios appropriate for the operations site-specific environmental and operating circumstances. The emergency response procedures have been referenced against each of the potential cyanide failure scenarios:

a) Catastrophic release of hydrogen cyanide from storage or process facilities. The emergency level will be evaluated according to the Newmont's Rapid Response System (RRS) severity matrix, the ERT will act. Emergency plans related to this scenario are the Contingency Plan for Hazardous Material and Chemical Spills, Contingency Plan for Injuries or Medical Emergencies, and SOP Emergency Response.

b) Transportation accidents. Yanacocha purchases its sodium cyanide from Orica under a Purchase Agreement. Orica is both the cyanide producer and transporter. Orica's cyanide transporter, DCR, will be first responder to an emergency on the road; secondary response will be by Engineering Services ; tertiary response will be the Newmont SSR response system. DCR has developed and implemented its own contingency plan. Yanacocha has contracted Engineering Services to coordinate any emergency response in the event of a transport accident en route to the mine. The auditors reviewed records of coordination meetings for emergency response between Engineering Services and emergency response authorities along the route. In addition, Yanacocha has also developed and implemented the following contingency procedures for transportation accidents: Contingency Plan for Vehicle Accidents, Contingency Plan for Off-Site Emergencies, Contingency Plan for Transporting Hazardous Materials, and Contingency Plan for Sodium Cyanide Transportation

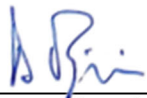
c) Releases during unloading and mixing. SOPs for cyanide preparation at each process plant address cyanide releases; in addition this issue is addressed in other ERP documentation: SOP Cyanide Solution Preparation – Sparge System Pampa Larga, Cyanide Solution Preparation – Sparge System Yanacocha Norte, Cyanide Solution Preparation – Sparge System Gold Mill, Contingency Plan for Hazardous Material and Chemical Spills, Cyanide Exposure Instruction and Spill Management.

d) Releases during fires and explosions This emergency has been evaluated in the risk identification and hazards evaluation matrix. Temporary cyanide storage in sparge tanks and handling facilities are located away from incompatible chemicals and ignition sources. Nonetheless, Yanacocha has developed and implemented the ERP Firefighting Plan.

e) Pipe, valve and tank ruptures. Pipes, valves, pipelines and tanks have secondary containment. Leakage from the process or reclaim water pipeline would be contained within the HDPE-lined secondary containment corridor. The pipelines would be shut-down and repairs would be completed to the ruptured pipe(s). Any process solution would gravity drain to the containment pond. The pipeline and tanks are designed to drain back to the ponds. Nonetheless, the following contingency plans have been developed: ERP Contingency Plan for Hazardous Materials and Chemical Spills, Contingency Plan for Cyanide Solution Ponds Overflow.

f) Overtopping of ponds and impoundments. Section 4 of the ERP Contingency Plan for Cyanide Solution Ponds Overflow describes the measures corresponding to overtopping. The plan establishes procedures for alerting,

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containing, controlling, evacuating, and sheltering people. The plan defines responsibilities and provides procedures designed to identify unusual and unlikely conditions that may endanger the ponds and impoundments, as well as corrective actions and public notifications.

g) Power outages and pump failures There are backup generators to power the equipment necessary to contain and control process solutions. If there was a spill due to power failure, then the Contingency Plan for Hazardous Material and Chemical Spills would be used.

h) Uncontrolled seepage Section 2 through 4 of the ERP Contingency Plan for Emergencies in Dams describes the measures corresponding to emergencies due to uncontrolled seepage and failure of tailings impoundments and heap leach facilities. The Plan defines responsibilities and provides procedures to identify unusual and unlikely conditions that may endanger structures. The plan identifies corrective actions and public notifications.

i) Failure of cyanide treatment, destruction or recovery systems Yanacocha operates Excess Water Treatment Plants (EWTPs) to destroy cyanide and remove metals prior to direct discharge during the rainy season. The water treatment facilities are located at the Yanacocha Norte and Pampa Larga process areas. Additionally, Yanacocha operates three Acid Water Treatment Plants (AWTPs) to manage acidic drainage from mine water facilities. The AWTPs are located at the La Quinoa, Yanacocha Norte and Este mine areas. The following contingency plans have been developed: ERP Contingency Plan for Hazardous Material and Chemical Spills, and Contingency Plan for Cyanide Solution Ponds Overflow.


j) Failure of tailings impoundments, heap leach facilities and other cyanide facilities Section 2 of the ERP Contingency Plan for Emergencies in Dams describes the measures corresponding to emergencies due to failure of tailings impoundments and heap leach facilities. The plan establishes procedures for notifying, evacuating, and sheltering of people at risk. It also covers actions in case of flooding caused by failures.

Yanacocha works together with Orica and with DCR – the ICMC certified cyanide transporter- to ensure that all transportation-related emergencies are considered and that emergency response plans for such incidents are on file and up-to-date. DCR is responsible for the cyanide delivery from Orica's transfer plant in Ventanilla, Callao to Yanacocha's cyanide sparge mixing areas in the mine site. Cyanide is transported to site in isocontainers.

DCR considers the transportation route, physical and chemical form of the cyanide, method of transport (truck), the condition of the roads and the design of the transport vehicle during the development of their emergency response plan. DCR will be responsible in the event of an emergency in route (spills, accidents, etc.). DCR has an emergency response vehicle that escorts every cyanide delivery.

The lines of responsibility for safety, security, release prevention, training and emergency response as they relate to transportation of sodium cyanide are outlined in the agreement for sodium cyanide purchase and transport to Yanacocha with Orica. All cyanide transporters are certified transporters under the Code and are required to comply with the Code's Cyanide Transportation Verification Protocol. In case an emergency occurs prior to the delivery of the cyanide to Yanacocha mine site, then Orica and DCR are responsible for emergency response as

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well as the remediation and cleanup in case of a cyanide release. Verification was conducted by reviewing the Code's certifications of the cyanide providers' supply chain of cyanide to Yanacocha and review of DCR and Orica Emergency Response Plans.

Cyanide response plans and procedures have been developed to provide a suitable level of detail to ensure that effective response can be completed in an emergency situation. The ERP sections describes specific response actions (as appropriate for the anticipated emergency situations) such as clearing site personnel from the area of exposure, use of cyanide antidotes and first aid measures. The emergency response procedures and contingency plans describe the organization and specific response actions to be followed in the event of an emergency. These plans describe specific management, Emergency Response Team (ERT) and employee actions to be followed for the identified scenarios.

Yanacocha ERP includes a list of telephone numbers with the name of the person to be reported in the communities downstream of the Rejo river and Rio Grande in case of overflow of the pond with cyanide solution. Communication and interaction with these people is in charge of the community relations area.

Yanacocha has also developed a procedure to guide the onsite treatment of cyanide exposure victims. The procedure covers the process to follow for cyanide ingestion, eye contact, skin contact, and inhalation. The cyanide antidote procedure is also detailed. The mine has developed a site instruction detailing the process to transfer patients from site to offsite medical treatment facilities, as well as a procedure describing the process for transferring patients to offsite primary and secondary health care facilities.

The plans define team member responsibilities, communication procedures for notifying outside emergency response resources, government agencies, the community, other stakeholders and the press. Detailed emergency responses (i.e. critical valves, switches, pumps) for reagent strength cyanide are found in the specific individual work procedures.

STANDARD OF PRACTICE 7.2


Involve site personnel and stakeholders in the planning process

The operation is

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

The Emergency Response Plan and procedures developed for Yanacocha involve cross-functional teams from the Process, Health, Safety, Security, Environmental, Community Relations and other departments as needed. This

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helps to ensure that adequate consideration is given to the various impacted stakeholders and ensures that personnel understand and are aware of their roles in an emergency.

Yanacocha's workforce is regularly approached by the operation through meetings held after each emergency drill, the monthly meeting of the H&S Committee and the monthly H&S meetings with contractors. The ERP is updated annually during a staff meeting where the input received from the workforce is taken into account. The auditors reviewed examples of the H&S meeting records where emergency response is discussed. In addition, Yanacocha solicits the input of their workforce via direct communication to supervisors or during daily meetings where emergency response issues can be discussed. Monthly meetings are also scheduled to discuss health and safety issues related to new task-specific changes. Changes to the ERP are discussed at this meeting.

Yanacocha is part of the Civil Defense committee in Cajamarca and as such is in permanent coordination with the authorities, including the emergency responders.


Potentially affected communities along the cyanide transportation route are informed by the contractor Engineering Servies, who meet periodically with authorities and emergency response agencies such as the police and firefighters, to explain the ERP and ask for their input. The auditors reviewed Engineering Services meeting reports covering the 3-year audit period. Verification was conducted by reviewing records of meetings, topics and attendance records of community meetings, power point presentations and the course attendance records

Yanacocha has periodic meetings with communities and emergency response agencies such as firefighters and hospitals along the transportation route. Besides explaining the ERP, they inform about the mine activities, hazards and control measures, and via Engineering Services, Yanacocha provides them with 2 and 3-day instruction in different emergency topics: APELL (Guidance for the Mining Industry in Raising Awareness and Preparedness for Emergencies at Local Level), ERT training, first cyanide aid, confined spaces and HAZMAT. Also, information to communities on cyanide (including risks and emergencies) is provided in written format by means of reports available online to the public.

Yanacocha has involved outside responders such as firefighting companies and local authorities along the cyanide transportation route, by means of Engineering Services, a specialized emergency response company who is communicating and training outside responders along the cyanide transportation route to the mine. Yanacocha's onsite medical provider is Plan Vital and Limatambo Clinic at Cajamarca. The auditors reviewed the contract between Yanacocha and Plan Vital for onsite medical service covering the 3-year audit period. The auditors also reviewed the reports on Yanacocha's training in cyanide response to Cajamarca's Limatambo Clinic and local response agencies.

Yanacocha actively solicits the input of their workforce to keep the ERP current, via direct communication to supervisors or during daily meetings where emergency response issues can be discussed. Monthly meetings are scheduled to discuss health and safety issues related to new task-specific changes. Changes to the ERP would be discussed at this meeting. For emergencies in inland cyanide transport, Yanacocha has involved outside

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responders, such as firefighting companies and local authorities along the cyanide transportation route, by means of Engineering Services contractor who is communicating with and training outside responders along the cyanide transportation route to the mine. Yanacocha also solicits the input of various stakeholders during the emergency response mock drills evaluation process. The ERP is a controlled document and has been reviewed and updated annually according to Yanacocha's Document Control Procedures.

Local community leaders and impacted persons will be oriented by the Community Relations department and/or other relevant personnel of emergency response plans and requirements including updates if and when changes to the mine facilities dictate a change in the emergency response plans.

Yanacocha is part of the Civil Defense committee in Cajamarca and as such is in permanent coordination with the authorities, including the emergency responders.


STANDARD OF PRACTICE 7.3

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

The operation is ☒ in full compliance with Standard of Practice 7.3
☐ in substantial compliance with
☐ not in compliance with

- a) The response system organization in place at Yanacocha designates the Incident Commanders and the establishment of an Emergency Operations Center (EOC). The Incident Commander has the authority to commit the necessary resources. Primary and alternate Emergency Response Team (ERT) Coordinators are specified on the ERT Roster.
- b) The ERT Roster in the emergency response plan identifies the ERT members, their contact details including mobile phone numbers, and the ERT team they belong to.
- c) The annual emergency response training program details the training program required for all employees, managers and officials, transport carriers, and ERT members. All employees are required to take first aids and firefighting courses; managers and supervisors: incident management including Newmont RRS; transport carriers HAZMAT course; and ERT members firefighting course, advanced first aid, vehicle rescue course (vehicle extrication), rope rescue, HAZMAT and incident management.
- d) The ERP Communication in case of emergency, details the communication process and general 24-hour contact numbers. The ERT Roster identifies the ERT members, their contact details including mobile phone numbers, and the ERT team they belong to.
- e) The ERP Responsibilities before, during and after an emergency, details the duties and responsibilities for the incident commander, the brigade members, supervisors, managers, and security control center

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personnel. The ERP Emergency response system organization, details the emergency response system organizational chart.

- f) The ERP 90-01 Appendix shows the emergency equipment list for the ERT. The ERT Leader maintains inventory list.
- g) The SOP PP-E 11.01 Inspections specifies the type of inspection, responsible department, and inspection frequency. In addition, it contains blank versions of the inspection forms. The operation conducted routine inspections of its emergency response equipment over this ICMC recertification period.
- h) The ERP Newmont Rapid Response System and the ERP Introduction and Policies, consider the roles of external responders. For emergencies Level 3 or "High Level" that exceed the resources available at the site, Yanacocha may consider external support offered by the government, industry and/or other companies. The ERP Contingency plan for off-site emergencies, indicates which public entities will support in a transport emergency.

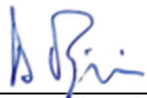
Verification was through interviews with the Health and Safety Superintendent, medical staff and review of the ERPs.

The operation has made outside entities included in the emergency response plan aware of their involvement and has included them as necessary in mock drills or implementation exercises. Yanacocha involves potentially affected communities by means of Engineering Services, who meets with and trains authorities, hospitals, and firefighters. The ERP Drills procedure and annual plan, details the types and schedule of emergency drills. Limatambo Hospital's personnel participates in the drills and training provided by Yanacocha through the mine's health safety work area. The medical staff of the clinic visits the mine operations annually. They receive courses in firefighting, first aids and emergency response.

Through the APELL program, in April 2019 trainings requested by Cajamarca's Civil Defense organization were also conducted in emergency response to the communities of *Porcón Bajo*, *Granja Porcón*, and *Bellavista Baja* in April 2019, and to *Serenazgo* Cajamarca in October 2018, which is an agency of the Municipality of Cajamarca to provide security services to the population.

Yanacocha is part of INDECI (Institute the Civil Defense) committee in Cajamarca and as such is in permanent coordination with the authorities, including the emergency responders. The Regional Government of Cajamarca through INDECI, coordinates and trains with Yanacocha, especially on the issue of bush fires, where there are also opportunities to review cyanide issues, if necessary.

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STANDARD OF PRACTICE 7.4

Develop procedures for internal and external emergency notification and reporting.

The operation is

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

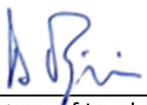
Yanacocha emergency response plans include procedures and contact information for notifying management, regulatory agencies, outside response providers and medical facilities in the case of a cyanide emergency. The ERP-02.01 Communication in Case of Emergency and the ERP-02.02 Newmont Rapid Response System detail the communication process and contact numbers for emergency response. The Security Control Center, available 24-hour, maintains a detailed emergency contact list of all stakeholders. The ERP-02.03 Emergency response system organization, details the emergency response system organizational chart.

In the event of any emergency, workers should all the Control Center where all the emergency telephone contact lists are available. For level 2 and level 3 emergencies, the Newmont rapid response system will be activate.

The emergency response plans provide clear lines of responsibility for relevant departmental personnel to contact and notify community members of emergency situations. The Control Center maintains a detailed emergency contact list of all stakeholders including a listing of key community leaders and potentially affected people in the nearby communities. The Newmont rapid response system provides a protocol and contact information to ensure that media inquiries and communications are adequately handled and communicated in an appropriate manner by authorized personnel.

The ERPs include procedures and contact information for notifying potentially affected communities of the cyanide related incident and any necessary response measures, and for communication with the media. The ERP-02.01 Communication in Case of Emergency, details the communication process and general 24-hour contact numbers for emergency response. The ERP-02.03 Emergency response organization, details the emergency response system organizational chart. The Environmental and Social Responsibility Department is listed on the organizational chart for the purposes of notifying communities and liaising with the media. The transportation company is responsible for any transportation related cyanide releases.

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STANDARD OF PRACTICE 7.5


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

The operation is ☒ in full compliance with Standard of Practice 7.5
☐ in substantial compliance with
☐ not in compliance with

The ERP sections and associated environmental procedures describe specific information on cyanide event remediation activities including control and containment of any spilled/released material. Specifically, the plans include guidance on:

- a) Recovery and/or neutralization (if required) of solids and solutions for final disposal. The ERP-40.01 Contingency plan for sodium cyanide transportation and the ENV-PR-001 Spill handling procedure, provide information on the recovery and disposal of spilled solid cyanide and solution, as well as the neutralization and decontamination of soils and equipment. The Contingency plan (ERP-401), Section 3.12 Spill on soils, describes the procedure to clean contaminated soil due to cyanide solution spills as applicable for transport, pads, and process plants. The procedure specifies that spills be swept or shoveled into designated containers and that the material is kept dry. Berms or dikes are to be constructed, as necessary, to prevent wider spread of the spill and prevent it from reaching watercourses. According to Table 3 of the Spill Handling Procedure, the cyanide solution spill kits are stored at five different areas of the mine: Maqui Maqui, Carachugo, Yanacocha Norte, la Quinoa and at the General Warehouse.
- b) For decontamination and remediation of the affected areas, Section 5.3.3 of the Cyanide Management General Plan (MA- DI-015) addresses the procedures for decontamination of soils and water. The contaminated area must be evacuated and soils impregnated with cyanide disposed of in the nearest leach pad cell, after coordination with the corresponding supervisors. Section 5.3.2 addresses cyanide spills neutralization for each scenario according to Table 1 Dosing Parameters for Neutralizing Cyanide Spills. Decontamination of soil is also addressed in the Contingency Plan for Sodium Cyanide Transportation (ERP-40-01). The Spill Handling Procedure addresses to monitor the affected area once the cleaning tasks in the area have been completed. It should be verified by taking one or more soil samples the absence of cyanided solution. Final cyanide concentration allowed in residual soil as evidence that the release has been completely cleaned up is according to require by the Environmental Quality Standards (ECA) for Soil local regulations. If the spill has reached water courses, water samples will be taken at the downstream impacted area to verify the presence of cyanide.

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- c) Management and/or disposal of spill clean-up debris. As noted in the Spill management procedure (Env. PR-001), spilled cyanide solutions within the process plants will be returned to the process circuit. Spill clean-up materials are to be disposed of on the heap leach pad.
- d) Provision of an alternate drinking water supply. The water source at Yanacocha is bottled water. As such, there is minimal risk of cyanide contamination to drinking water. As precaution, Yanacocha has placed signs above the water faucets in cafeteria and bathrooms to not to drink that water. Although it does not specify how Yanacocha would provide an alternate drinking water supply, Section 7.5 of the Cyanide Management General Plan (MA-DI-015) includes the commitment to provide drinking water to nearby residents if their supply is contaminated with cyanide.

Section 5.3.2 of the Spill Management Procedure (Env. PR-001) describes the requirements and precautions for cyanide spill cleanup which prohibits use of neutralizing agents as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released in areas where it could reach storm water collection or surface water bodies. The ERP-40.01 Contingency Plan for Sodium Cyanide Transportation prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. The procedures also note that these chemicals may be used in an emergency only, when concerns with protection of human health outweigh the risk to aquatic life and an engineered system to introduce these chemicals into a surface water body has been designed.

The spill management procedure (ENV-PR-001) addresses the potential need for environmental monitoring to identify the extent and effects of a cyanide release. The water and soil monitoring procedure (ENV-PR-042) describes the sampling methods, parameters and, where practical, possible sampling locations. The procedure specifies response actions consisting of investigating the migration of the release; having trained personnel stop the release when safe to do so; collection of a sample of the release to determine concentrations, treatment, clean up and remediation; collection of analytical information on released material; and confirmation samples from the cleanup. The procedure describes where samples should be obtained, proper sampling methodologies, and parameters.

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STANDARD OF PRACTICE 7.6

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

The operation is ☒ in full compliance with Standard of Practice 7.6
☐ in substantial compliance with
☐ not in compliance with

The operation reviews and evaluates the cyanide-related elements of its ERP. The ERP 01.01 Introduction, Policy, Objective and Definition of an Emergency, requires the plan to be reviewed annually and reviewed after all cyanide emergencies. Yanacocha also provided versions of the ERP for the recertification period, supporting that this document is reviewed and updated periodically.

Yanacocha conducts cyanide emergency drills periodically as part of the emergency response plan evaluation process to test the emergency preparedness and response of Process Plant, ERT, Environmental, Security and other relevant departments and personnel. Drills are developed to include a variety of locations and scenarios including environmental release and exposure responses. Drills are developed in advance and risk assessed to minimize potential impact of event unpreparedness. Verification was through interviews with the Health and Safety Superintendent and review of the drills reports performed during the recertification period.


The ERP-20.01 Drill procedure and annual plan details the types and schedule for emergency drills. A review of the drill evaluation reports confirmed this schedule was achieved during the recertification period, except during year 2020 as local regulations prohibited Peruvian mine sites to perform emergency mock drills due to COVID-19 pandemic.

The auditors reviewed the reports of the drills and scenarios that were completed during the audit period. On September 5, 2018 an emergency mock drill was performed at Pampa Larga process plant simulating a cyanide exposure Level II, which is a "Medium Level" emergency that cannot be handled by the personnel of the affected area, requiring the intervention of the Emergency Response Team.

On June 5, 2019 the Process Area performed a mock drill simulating an emergency rescue to 2 workers intoxicated with cyanide (unconscious) during a cyanide spillage.

For 2021 the operation has scheduled a cyanide mock drill with spill and cyanide exposition to workers. The ERP-20.01 for drill procedure requires that a meeting is held following each drill to review the performance and develop a three W plan (What Who When). Deficiencies and corrective actions are placed in the Corrective Action Register. A review of the Corrective Action Register showed that all corrective actions for the drill were closed.

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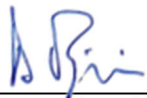

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Provisions are in place to evaluate and revise the emergency response plan after any cyanide-related emergency. Yanacocha requires that all cyanide related emergencies are investigated and drills evaluated to develop corrective actions and continuous improvement opportunities. Yanacocha requires the ERP to be reviewed annually and reviewed after all levels of cyanide emergencies. Events and mock drills will be debriefed to identify and document improvement opportunities and actions for assignment to appropriate personnel. During the 3-year audit period the ERP was not activated for any incidents, so no changes to the ERP were made as a result of an emergency. The auditors reviewed the operation's incident reports; all incidents were reported as minor environmental spills.

Events and mock drills will be debriefed to identify and document improvement opportunities and actions for assignment to appropriate personnel. During this recertification period there was no event needing to activate de ERP, no reviews to the ERP have been performed due to this reason.

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PRINCIPLE 8 - TRAINING

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

STANDARD OF PRACTICE 8.1

Train workers to understand the hazards associated with cyanide use.

The operation is

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

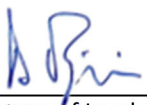
All personnel and visitors to the site attend a site induction training which discusses cyanide hazards present on the site. In addition to the general site induction, a Process Plant Induction is required for all personnel with process plant access. This training provides a plant overview and includes environmental, health, and safety standards for working inside the plant area inclusive of cyanide risks and safe operating practices. The training covers but is not limited to locations where cyanide is present, alarm response, PPE requirements, safe handling and management guidelines, symptoms of exposure, cyanide first aid and emergency response. Training is in charge of contractors Alcomex and Metallurgical Training and Consulting.

Yanacocha's training procedure (PP-E-05-01) establishes the guidelines for employees and contractors to receive training based on the risks associated with safety, occupational health and management. The annual training program is approved by the Health and Safety Committee.

Yanacocha trains its workers. Participants learn to recognize cyanide hazards, intoxication symptoms, and first aid, including how to use the cyanide kits. Among others, the auditors reviewed training records of the course First Emergency Response with Hazardous Materials Containing Mercury and Cyanide, Cyanide Management course and records from the First Response course. The auditors reviewed the training programs, spreadsheets for training follow-up, the power point presentation on the cyanide general induction, examples of the tests results and workers certificates approving the general induction in cyanide handling and cyanide poisoning. Interviews with site personnel confirmed they had completed hazard awareness training and knew how to identify hazards.

In addition to the site induction training programs, the mine also provides a number of additional hazard identification training courses and inspections to ensure that personnel are able to identify and report hazards that they observe in their respective work areas. For personnel and visitors requiring infrequent plant access, escorts are used to ensure their safety whilst inside the plant facilities.

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The auditors reviewed the site induction training material does not include recognition of high-concentration cyanide as a reddish liquid. After the audit Yanacocha sent the training material where they had included in all training material related to the recognition of cyanide, which in liquid form is reddish in color. No additional information was required to find this in compliance with the Code.

Cyanide hazard recognition refresher training is conducted annually at Yanacocha for all personnel. The training procedure (PP-E-05-01) addresses annual refresher instruction. The auditors reviewed the annual training program and spreadsheets for data induction where refresher training is also documented, as well as examples of the attendance lists. Interviews with site personnel confirmed they had completed hazard awareness training and that refresher training was completed.

Yanacocha retains the cyanide training records throughout an individual's employment documenting the training each worker receives. The records include the names of the employee and the trainer, the date of training, the topics covered, and if the employee demonstrated an understanding of the training materials. Until 2012, Yanacocha used the Ellipse® system to keep a training database. The auditor reviewed examples of initial induction training and refresher training covering the audit period to verify compliance. The auditor was able to review both electronic and hard copy records, including records for those employees that were interviewed during the site visit. Employee training requirements and completion records are maintained and managed.

STANDARD OF PRACTICE 8.2

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

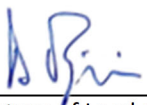
The operation is

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

All personnel that work in the plant must undergo training prior to being allowed to work at the process plant. The guidelines for specific work training (PP-E-05-01) require instruction on the SOPs to be performed by the supervisor of each new or transferred employee, or when new work methods, equipment, machines and materials are introduced.

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 worker health and safety. Individual training is provided for each specific task an operator will perform related to cyanide management. By observation, the supervisor evaluates the operator worker performance. Task-specific training include cyanide preparation, cyanide solution

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dose rate, washing procedures for filters with cyanide solution, clarification filter preparation, maintenance and washing procedures for clarification filters, gold precipitation, Merrill Crowe plant start-up, cyanide spill inspections after cyanide preparation, equipment operation and maintenance, safety procedures, emergency response procedures, waste disposal, chemical product management, communication and reports, and inspections.

Training progress is reported quarterly to area managers, superintendents and plant chiefs by means of the excel spreadsheet (tracker chart). The auditors reviewed the quarterly training programs and examples of employees' job charts. The job chart is a form is filled out by a supervisor to verify compliance with training requirements. After successful completion of these training sessions, operators are assigned to a specific circuit and work under the direction of a competent operator until they have been deemed competent to work without direct supervision. Determination of competency is based on test score and observations by qualified and/or experienced plant operators and/or maintenance personnel.

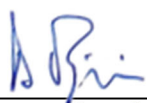
Training includes On the Job Training, which is conducted by a qualified trainer who shows in the field how to safely conduct tasks related to cyanide management; and Planned Task Observations, which is conducted by the supervisor of the trainee. Verification was reviewing training records covering the recertification period and interviewing field personnel.

The training elements necessary for each job involving cyanide management are identified in the employee's job chart for task training (PF-F-05.01-01), where the supervisor identifies the training requirements, notes the job hazards, and lists the PPE required. The supervisors use the work procedures (SOPs) as training materials. The auditors reviewed examples of the job charts for task training (PF-F-05.01-01) covering the 3-year audit period to verify compliance.

The mine has developed a series of training programs designed to build awareness and competency for various plant activities and programs. Each training module includes a training plan which outlines the course objectives and expected competency testing requirements for the module. Training elements for each specific job are identified in the work procedures and presentations that are used as training material. Personnel are trained following the work procedures, which include the step by step process to perform the job. These work procedures include the objective of the procedures, photos of the task/activity to be conducted, required PPE, decontamination requirements, risks associated with the cyanide task, contingency plans and the individual task specific steps.

Appropriately qualified personnel provide task training related to cyanide management activities. Yanacocha's training procedure guidelines (PP-E-05-01) requires supervisors to give the specific work training. Training is provided by experienced supervisors at each area of the process plants. Plan Vital is in charge of the training in "Cyanide Kit Management".

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Process supervisors with several years of experience in the processes provide task specific training to operators. Verification was through interviews with process people and review of training records to verify compliance.

All personnel in job positions that involve the use of cyanide and cyanide management are required prior to working with cyanide, to receive training on how to perform their assigned tasks with minimum risk to worker health and safety. After completing the pre-requisite training, employees complete a classroom-training program prior to working with cyanide.

Individual training is provided for each specific cyanide related task that an operator will perform and includes cyanide work procedures. A senior/junior on-the-job training approach is used to further training for the personnel on job activities and cyanide safety. Yanacocha provides task training to staff prior to working with cyanide and the staff must successfully complete the training before they work independently. Before that time, new staff must be accompanied by more experienced staff. New trainees are assigned to work in one of the circuits under the supervision of a competent operator. These trainees are required to work under direction of these competent operators until they demonstrate ability to work without direct supervision In a safe and responsible manner.

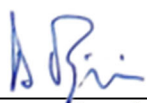
Annually refresher training on cyanide management has been provided to all employees that work with cyanide. Yanacocha's annual training program includes four hours of instruction in cyanide handling, cyanide poisoning and task training for all workers. The auditors reviewed the excel spreadsheets for data induction where refresher training is documented and examples of the attendance records for these refreshers covering the 3-year audit period.

Interviews with site personnel confirmed they had completed cyanide management training and that refresher training is undertaken. Training records and test results covering the recertification period were reviewed by the auditors and were found to be complete.

To evaluate the effectiveness of task specific training related to cyanide, tests are usually taken after a classroom training session while planned task observations are conducted by the supervisor of the trainee after on-the-job training sessions. Training programs include an assessment component to ensure that personnel are able to understand the training that they have completed. Testing can be done either via a written exam or practical assessment by qualified Process Plant trainers.

The operation evaluates the effectiveness of cyanide training by testing and observation. Section 4.0 of Yanacocha's training procedure (PP-E-05-01) requires human resources staff and supervisors to evaluate training effectiveness. Yanacocha has written tests to evaluate the effectiveness of cyanide training, before and after the training. The auditors reviewed examples of these tests, covering the 3-year audit period. In addition, operators who perform cyanide-related tasks are observed by their supervisors to evaluate their performance. Yanacocha's supervisors, after 3 months working with the new employee, must report to Human Resources about the

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employee's performance, including the worker's understanding in specific task training. The auditors reviewed examples of these supervisor reports to verify compliance.

Records of training are retained throughout an individual's employment documenting the training they receive, as general induction records and job charts for task training. The records include the names of the employee and the trainer, the date of training, the topics covered, and if the employee demonstrated an understanding of the training materials.. Since then, they use the excel spreadsheet database "Tracker Chart". In addition, process areas retain task-specific training records of their employees, as advised by the Senior Instructor. Training records were reviewed for the recertification audit period.

STANDARD OF PRACTICE 8.3

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

The operation is

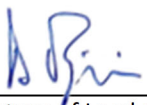
- ☒ in full compliance with Standard of Practice 8.3
- ☐ in substantial compliance with
- ☐ not in compliance with

Yanacocha trains all cyanide unloading, mixing, production and maintenance personnel in the procedures to be followed if cyanide is released. The annual emergency response training program (ERP- 19.01) requires that all personnel receive training in first aid and firefighting within 15 days of starting at the mine. The training procedure (PP-E-05-01), Section 4.0, requires supervisors to receive H&S specific training within 3 months of being appointed as supervisor and to familiarize workers on the requirements for the preparation for and response to emergencies.

Yanacocha employees who have the potential to come into contact with cyanide are required to be trained in the sodium cyanide handling and sodium cyanide poisoning first responder courses. The sodium cyanide handling course summarizes the procedure to be followed in the event of a cyanide release while the sodium cyanide poisoning course summarizes the procedure to be followed in the event of cyanide exposure including information on cyanide antidotes. The auditors reviewed the quarterly process plant training programs and examples of training records on cyanide handling and response to cyanide poisoning via the tracker charts covering the 3-year audit period.

Verification included review of training record and interviews with operators as well as process and safety personnel. Operators were interviewed and demonstrated good awareness of what actions are to be taken in

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the event of cyanide release. Records of training attendance were reviewed by the auditors and found them complete.

Yanacocha's site cyanide response personnel, including unloading, mixing, production and maintenance workers are trained in decontamination and first aid procedures. Personnel have taken part in drills to test and improve their response skills.

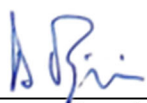
Yanacocha's emergency response training program requires that all personnel receive first aid training within 15 days after work began, that the supervisors receive training within 3 months of being appointed as supervisor, and that supervisors familiarize workers preparation for and response to emergencies. All employees who have the potential to contact cyanide are required to be trained in the Sodium Cyanide Handling and Sodium Cyanide Poisoning courses. The auditors reviewed the training material presentations and examples of training records on first aid, cyanide handling (which includes decontamination) and poisoning. First aid and cyanide poisoning training is provided by Yanacocha's medical contractor, Plan Vital. Verification included review of training records and random interviews with operators.

Yanacocha trains the Emergency Response Team members in the use of necessary response equipment. The operation has a fulltime Emergency Response Team (ERT) trained to the Yanacocha Emergency Management Plan requirements. The brigade is capable of responding to all types of mine emergencies, not just cyanide-related emergencies. Section 2.3 of the emergency response training program (ERP-19.01) details the annual training program required for ERT members: Fire Fighting Advanced First Aid Vehicle Rescue Rope Rescue Hazardous Materials Incident Command Search and Rescue Course. (BREC). Water Rescue Confined Spaces The training consists of videos, assignments, readings, written exams, practical exercises, discussion table and simulations based on potential incidents.

ERT members are trained through participation in mock drill exercises as well as formal training programs. Formal brigades are in place for fire, first aid, spill, and evacuation. Emergency responders are available on all shifts. Fire wardens (emergency coordinators) are also trained on how to react in emergencies situations, including cyanide related events. Training incorporates emergency response plans, pre- incident plans, rapid response program, standard work procedures, and equipment installation. The auditors reviewed the ERT training records and confirmed that training was conducted for the 3-year audit period.

Yanacocha has made the off-site emergency responders familiar with the elements of the ERP related to cyanide. Community members, firefighters, civil defense, police and medical providers are familiar with the ERP, although for onsite emergencies, Yanacocha does not anticipate the involvement of other local response agencies for cyanide emergencies as Yanacocha has onsite capabilities for fire-fighting and HAZMAT. For emergencies in inland cyanide transport, Yanacocha has involved outside responders such as firefighting companies, hospitals and local authorities along the cyanide transportation route, by means of Emergency Response Solutions, a

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specialized emergencies response company who is communicating and training outside responders along the cyanide transportation route to the mine.

Refresher training for cyanide events is conducted as part of the site training and mock drill programs. Training requirements from the training matrix are routinely monitored and refresher training is scheduled as required which include hazmat technician, HAZMAT and Cyanide Awareness. At Yanacocha, refresher training for response on cyanide is conducted annually. Section 2.0 of the annual emergency response training program (ERP-19.01) details the training program required for all employees, managers and officials, transport carriers, and ERT member.

Section 3.0 of the training procedure (PP-E-05-01) defines refresher training to update H&S knowledge. Cyanide hazard recognition refresher training, which includes emergency response procedures, is conducted annually at Yanacocha for all required personnel. The auditors reviewed the excel spreadsheets for induction data where refresher training is documented and examples of the attendance records covering the 3-year audit period. Interviews with site personnel confirmed they had completed cyanide management training and that refresher training is undertaken.


Simulated cyanide emergency drills are periodically conducted for training purposes. Cyanide emergency response drills are scheduled no less than one per year to test the emergency response systems and capabilities of site personnel. Various types of responses are tested including both cyanide spillages and exposure scenarios. The Emergency Response Team (ERT) trains weekly to ensure that are able to respond to an emergency and that their skills remain current.

At the completion of emergency response drills, debrief sessions are held to review and identify the actual versus expected outcomes of the emergency response to identify opportunities for improvement and changes to training and awareness programs. When deficiencies are identified in the response, corrective actions are assigned to relevant personnel which may include modifications to training and/or awareness programs to ensure that gaps are addressed.

The ERP-20.01 for drills requires that a meeting be held following each drill to review the performance and develop a three W plan (What Who When). Deficiencies and corrective actions are placed in the Corrective Action Register. A review of the Corrective Action Register showed that corrective actions developed for each drill were closed.

The auditor reviewed the mock drills reports and supporting documentation to verify that action items identified for the mock drills have been accomplished. Records of the mock drills debrief and training sessions were also reviewed to verify the evaluation of drills considers the adequacy of training.

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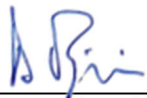

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Yanacocha retains the cyanide training records throughout an individual's employment documenting the training each worker receives. The records include the names of the employee and the trainer, the date of training, the topics covered, and if the employee demonstrated an understanding of the training materials.

Samples of records were reviewed and found to be complete. The name of the employee, the name of the trainer, the date of the training, the topics covered, and the result of the testing are maintained as part of the record files. Verification was through interview with training and process personnel and review of training records.

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PRINCIPLE 9 - DIALOGUE

Engage in public consultation and disclosure.

STANDARD OF PRACTICE 9.1

Provide stakeholders the opportunity to communicate issues of concern.

The operation is

<input checked="" type="checkbox"/>	in full compliance with	Standard of Practice 9.1
<input type="checkbox"/>	in substantial compliance with	
<input type="checkbox"/>	not in compliance with	

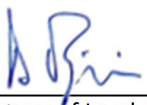
Yanacocha maintains a robust community grievance mechanism to provide the opportunity to all stakeholders to communicate and engage community members with sharing their issues and concerns.

The operation has maintained an up-to-date procedure “Management of Incidents and Complaints” that addresses incidents, complaints and concerns related to communities located within the mine influence area. The procedure defines roles and responsibilities, the process system and monitoring and reporting requirements. The auditors reviewed the series of complaints for the re-certification period and there are no cyanide related grievances included.

During times of Covid-19 pandemic, most grievances are being received by phone (WhatsApp dedicated lines). Yanacocha’s Cultural and Information Center (Centro de Información y Cultura) in Cajamarca City has been closed due to the Pandemic; however, is currently evaluating reopening based on the National Covid Mitigation Plan.

Yanacocha’s social networks: Instagram, Facebook and Twitter, continue to have a growing use by urban and rural stakeholders, which can also be used to interact with the mine. The Yanacocha website provides information on the use of cyanide for gold extraction and has provisions for stakeholders to communicate issues of concern.

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STANDARD OF PRACTICE 9.2

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

The operation is ☒ in full compliance with Standard of Practice 9.2
☐ in substantial compliance with
☐ not in compliance with

A variety of stakeholder engagements and interaction methods are in place at Yanacocha, and all these have evolved and adapted to the social distancing norms declared by Peruvian Government because of Covid-19 pandemic. Yanacocha used to have constant face-to-face communications via the Community Liaison Officers, Community Information Centers (which are closed at the moment) and other meetings and tours (postponed until the Covid National Emergency is raised). Yanacocha is now prioritizing specific Social Coordinators in local communities maintaining social distance, a dedicated phone line, social networks, and the Yanacocha and Newmont websites. For internal stakeholders, Yanacocha continues to provide opportunities during workers and contractors meetings and during training.

STANDARD OF PRACTICE 9.3

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


The operation is	<input checked="" type="checkbox"/> in full compliance with	Standard of Practice 9.3
	<input type="checkbox"/> in substantial compliance with	
	<input type="checkbox"/> not in compliance with	

Yanacocha has several media documentation of how their activities are conducted and how cyanide is managed (Fact Sheets). This documentation is available to communities and stakeholders in Spanish and in a way that can be easily understood. Also, has developed written descriptions of how their activities are conducted and how cyanide is managed and has made these available to communities and other stakeholders.

The auditors reviewed the Cyanide presentations the site shared with visitors (restricted at the moment due to Covid 19) that cover the use of cyanide: the Gold Process and Environmental Management in Mining.

Yanacocha currently faces restriction to interact with stakeholders because of Covid-19, however, before the pandemic, the site was providing information on cyanide in verbal form upon visitor's arrival to Yanacocha's public site tours, which included presentations and videos regarding the mining operations and cyanide management. Currently, all these information and videos are available on the website or are also available at

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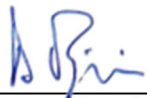
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Yanacocha's Good Neighbor Office in Cajamarca, maintaining social distance. A dedicated phoneline/WhatsApp (highly used in Cajamarca) provides information to rural communities, regarding questions and concerns.

No cyanide releases, worker exposure resulting in hospitalization or fatality have occurred during this recertification audit period, however they maintain a mechanism to report them. As described in the Cyanide Emergency Response Plan (ERP), Yanacocha would report any cyanide exposure resulting in hospitalization or fatality to the Provincial Police, Ministry of Health and the Ministry of Labor. This information will made available to the public on reporting to both ministries. In addition, information regarding cyanide release and exposure incidents made available in the Newmont annual Sustainability Report, would separately identify any such incidents occurring at the Yanacocha operation, so that stakeholders would be aware of their nature and location.

No cyanide incidents were reported for Yanacocha on Newmont's website for the 3-year recertification audit period.

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