Dhilmar Éléonore LP

ICMC RECERTIFICATION SUMMARY AUDIT REPORT

SEPTEMBER 10, 2025

SUBMITTED TO:

International Cyanide Management Institute
1400 "I" Street NW, Suite 550
Washington, D.C. 20005

and

Dhilmar Éléonore LP
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Audit dates	Novembre 7 to 12, 2024
Nature of Certification	Recertification – 2nd Cycle

1. LOCATION AND DESCRIPTION OF OPERATIONS

It is important to note that, at the time of the recertification audit, Newmont Corporation owned the Éléonore operations. During the recertification process, ownership changed to Dhilmar Ltd., and subsequently, Dhilmar Éléonore LP a subsidiary of Dhilmar Ltd.) became a Signatory to the Cyanide Code.

1.1 LOCATION

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

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

In 2023, D-E mine averaged 6,000 tonnes/day of processed ore. The mineral deposit at Eleonore mine is characterized by gold observed either as attached to sulfides, locked to sulfides or otherwise free and available to intensive cyanidation. To maximize recovery, process flow at the plant includes three-stage crushing, single stage ball mill grinding, gravity concentration, sulfides flotation, cyanide leaching and gold production in a carbon-in-pulp (CIP) circuit. The following is a short description of the important stages of the mill process.

1.1.1 Crushing Circuit (050)

The ore and waste materials coming from the underground mine is hoisted up the surface through a production shaft house located near the process plant. The material has a F100 size of 450 mm (100% of the material is at or smaller than 450 mm). The

reclaimed material is conveyed to primary crusher circuit. Before feeding into the jaw crusher, the material will pass through the vibrating grizzly feeder with 120 mm opening that by passes approximately 40% of the crusher feed. The grizzly feeder undersize and the jaw crusher product will be collected on a common conveyor to transfer material to the secondary crusher surge bin. The ore is reclaimed through a belt feeder and fed to a double-deck vibrating screen with 75 mm upper deck and 25 mm lower deck apertures. The oversize material discharges to the secondary standard cone crusher. The secondary crusher product and the secondary crusher screen undersize are collected onto a common conveyor with the tertiary crusher discharge and conveyed to two tertiary crusher double deck vibrating screens with 25 mm upper deck and 11 mm lower deck apertures. The tertiary crusher screen undersize product is conveyed and stored in two 2,500-tonne 'live' capacity fine ore bins or into the 2,000-tonne capacity waste bin enclosed to prevent freezing. These bins are located at the process plant and have more than 24 hours of storage capacity.

1.1.2 Grinding Circuit (150)

The ore stored in two fine ore bins are reclaimed via four (4) variable speed belt feeders and fed at a controlled feed rate into a single ball mill operating in closed circuit with a cluster of hydrocyclones for classification. The cyclone overflow has a 80% passing size at 65 µm particles directed to the flotation circuit. The underflow is recycled to the ball mill for further grinding.

1.1.3 Gravity Concentrator and Intensive Cyanidation (200)

A portion of the ball mill cyclone underflow will be treated in a gravity concentration circuit to recover liberated gold. A vibrating scalping screen removes coarse solids and ball scats. The screen undersize feeds a gravity centrifugal concentrator. The tailings from the gravity concentrator and the scalping screen oversize gravitate to the gravity concentrator tails pump box from where it is pumped to the cyclone feed pump box. The concentrate is flushed periodically to the intensive leaching circuit located underneath the hydrocyclone cluster.

The gravity concentrate is accumulated for 1 day and is processed in batches using an intensive cyanidation dissolution module. The dissolved gold in solution is pumped to a gravity pregnant solution tank situated in the gold room for subsequent electrolytic recovery of solution gold in the same electrowinning cell used for the stripping of the carbon from the CIP circuits. The gold sludge is periodically recovered and is smelted to doré bars. The rejects of the intensive leaching circuit are flushed to the grinding circuit pump box.

1.1.4 Flotation (250)

The overflow slurry from the hydrocyclones enters the mechanically agitated conditioning tank where it is conditioned with xanthate collector and copper sulphate promoter. The slurry from the conditioner flows to a single bank of six (6) rougher

flotation cells in series. The flotation cells are 130 m3 in size. Frother is added at the flotation feed box. The sulphide concentrate (approximately 7% weight recovery) is pumped to the flotation concentrate cyanidation circuit using froth pumps (1 operating and 1 standby) while the flotation tailing is pumped to the flotation tail cyanidation circuit using slurry pumps (3 pumps with either one or two pumps in operation depending on tonnage and the remaining pump(s) on standby). A thickener (400-THK-01) stage is present between the flotation and the Isamill grinding circuit.

1.1.5 Leaching Circuits (300, 350, 400, 450 / Flotation Tails & Flotation Concentrate)

Tails

From the flotation circuit, the flotation tailing is pumped to the flotation tails high-rate thickener to thicken the slurry to 59% solids. The thickener overflow water is recycled to the process water tank for reuse and the thickener underflow is pumped to the flotation tails leaching circuit. There are five (5) leach tanks operating in series.

Recycled process water, which includes cyanide, is added to adjust the leach feed slurry density to 45% solids. Dilute cyanide solution is added to the feed slurry to dissolve gold and silver. Slaked lime is added to adjust the slurry pH to about 10.5 to prevent HCN gas formation as a safety precaution. Cyanide is added to the first and third leaching tank and the cyanide addition rate is controlled with a cyanide analyzer. Cyanide concentration in the slurry is maintained at 0.15 g/L NaCN. The flotation tails leaching train has a total retention time of 36 hours. The slurry flows by gravity to each tank in steps of 600 mm.

Each tank is equipped with an agitator to maintain the solids in suspension and air is injected for gold dissolution. Interconnecting tank launders are arranged so that any tank in series can be bypassed without the whole plant having to shutdown.

After the leaching process, the slurry is transferred to the tails CIP circuit. The dissolved gold is adsorbed onto carbon in a Kemix AAC pumpcell system. The adsorption circuit has 6 tanks of 120 m3 each in series with 15 minutes retention time each and contains a total of 36 tonnes of carbon. The pumpcell mechanism combines the functions of agitation, inter-stage screening and slurry transfer in one unit. The suspension of the carbon and slurry mixture is maintained by the hydrofoil mixer. After the adsorption circuit, the flotation tails stream is pumped to the flotation tails CIP thickener for cyanide solution recovery. The thickener overflow is recycled to the leach feed as dilution water while the underflow is sent to the flotation tails cyanide destruction system.

Concentrate

The flotation concentrate is pumped to the flotation concentrate high-rate thickener where it is thickened to 55% solids. The thickener overflow water is recycled to the process water tank for reuse and the thickener underflow is pumped using hose pump

to the IsaMill feed pump box for ultra-fine grinding. The IsaMill is fed with the flotation concentrate thickener underflow and grinding media are added as required in the IsaMill feed pump box. The flotation concentrate is reground to about P80 of 13µm. he pH in cyanidation is maintained between 10.5 and 11 as a safety precaution to prevent HCN gas formation. Lead nitrate is added to both pre-aeration and leach to reduce the sulphides activity, thereby limiting SCN- formation which is detrimental to the cyanide destruction process downstream. Cyanide is also added to the first and third leaching tank and the cyanide addition is controlled with a cyanide analyzer. Cyanide concentration in the slurry is maintained at 0.4 g/L NaCN. The flotation concentrate leaching train has a total retention time of 48 hours. The slurry flows by gravity to each tank in steps of 400 mm. Each tank is equipped with an agitator to maintain the solids in suspension and oxygen, instead of air, is injected to promote gold dissolution rate. Interconnecting tank launders are arranged so that any tank in serie can be bypassed without the whole plant having to shut down.

After leaching, the slurry is transferred by gravity to the concentrate CIP circuit. The gold is adsorbed onto carbon in a Kemix AAC pumpcell system. In order to achieve the high gold loading on carbon and due to solution concentrations, the concentrate CIP system has been designed to have a 30-minute contact time in each pumpcell tank. The gold loading on carbon is expected to be as high as 15 kg/t of carbon. The adsorption circuit has ten (10) 30 m3 tanks in series for a total of 15 tonnes of carbon. After the adsorption circuit, the flotation concentrate stream is pumped to the concentrate CIP high-rate thickener preceded by a vibrating carbon safety screen. The thickener overflow is recycled to the flotation concentrate leach feed for dilution and the thickener underflow is directed to the cyanide destruction system.

Elution (500)

The loaded carbon recovered from the two CIP adsorption circuits (Flotation Concentrate and Flotation Tails) is pumped from the loaded carbon surge tanks to the acid wash vessel with a capacity of 6 tonnes of carbon for loaded carbon. The carbon is then pumped to the carbon stripping vessels. In the stripping vessels (6 tonne of capacity each), the gold is desorbed from the carbon by circulating a caustic-cyanide strip solution at high temperature (143 oC) and pressure (550 kPa) using the Zadra stripping process. The gold loaded strip solution, also called pregnant solution, is cooled with heat exchangers to about 88oC and pumped to the electrowinning cells. Reagents (caustic and cyanide) are added as needed to the strip solution to have the correct chemistry and conductivity for the carbon stripping. At the end of the elution cycle, the carbon is rinsed with fresh water and pumped to the carbon reactivation system.

Electrowinning & Refining (600)

The gold loaded strip solution, also called pregnant solution, is cooled with heat exchangers to about 88oC and pumped to the electrowinning cells. Each elution circuit

(Flotation Concentrate and Flotation Tails) has its own electrowinning circuit to feed. The pregnant solution is pumped into series of two (2) electrowinning cells in each circuit. The gold in solution precipitates and adheres to the cathode which is made of woven mesh stainless steel. The barren solution is pumped back to the elution vessel.

The electrowinning in the gold room is done with two (2) electrowinning cells per circuit. Additionally, a separate electrowinning cell is used to recover the gold in the pregnant solution from the gravity intensive cyanidation system. There are 5 cells in total. The refining furnace provided is an induction furnace.

Refined gold is poured to a series of moulds and the slag is poured into slag moulds.

Carbon Regeneration (550)

After stripping, the carbon slurry pumped from the stripping column feeds a dewatering screen ahead of the reactivation kiln. The dewatered carbon from the screen is stored in an 8-tonne capacity feed bin in front of the kiln which ensures a steady feed during kiln operation. A steam-rich and oxygen poor through negative pressure atmosphere is maintained in the kiln to prevent the carbon from charring. The carbon discharges from the kiln into a quench tank filled with water to simultaneously cool and wet the carbon. The kiln is electrical-fired and has a regeneration capacity of 8 tonnes per day. The reactivated carbon batch is pumped to the pumpcell systems after the carbon extraction in the pumpcell is completed.

Cyanide Destruction, Tailings Thickening & Filtration (650 & 700)

Separate cyanide destruction systems are required for the flotation concentrate (sulfide tailings) stream and the flotation tails (non-sulfide tailings) stream. All of the flotation concentrate stream will be used as paste backfill for the underground mine and only a portion of the flotation tails stream will be used for paste backfill, the remainder being trucked and stacked at the TSF (Tailings Storage facility). The elected cyanide destruction system is SO2/O2 method. The thickened slurries from their respective CIP thickeners are pumped to their respective cyanide destruction tank. The systems use SO2 to destroy the cyanide and oxygen is sparged into the tanks. Copper sulphate is added as needed to catalyze the cyanide destruction reaction and has been incorporated into the design. The target CNWAD (Weak Acid Dissociable) content at the output of the destruction system is 1 ppm. After the cyanide destruction process, the tails streams are pumped to their respective thickeners.

The slurry from cyanide destruction of flotation tails is fed to the non-sulphide tailings thickener with addition of fresh water and flocculant. The thickener overflow is pumped to the process water tank. The thickener underflow is pumped to the non-sulphide tailings filters surge tank. The non-sulphide tailings filters surge tank slurry is pumped to the pressure filters (2 operating, 1 standby). The filter cake falls to reversible conveyors either sending cake to the paste backfill plant, if needed, or to the enclosed nonsulfide tailings stockpile prior to the TSF. The same process exists for the flotation

concentrate. However, the sulphide tailings will be conveyed to the paste backfill plant only.

Cyanide Mixing (800)

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

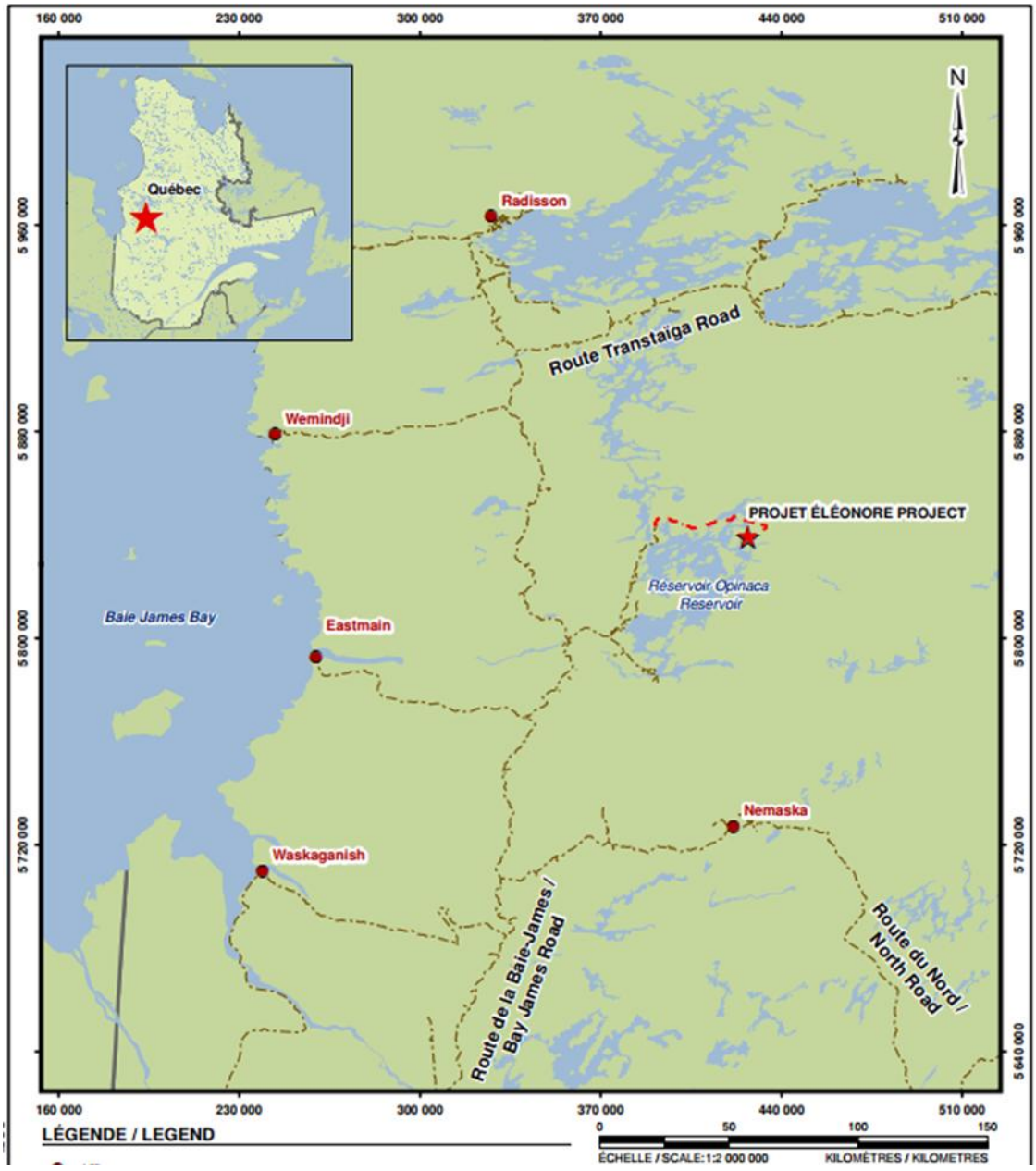

Figure 1 Regional Map

Figure 2 Mine Layout

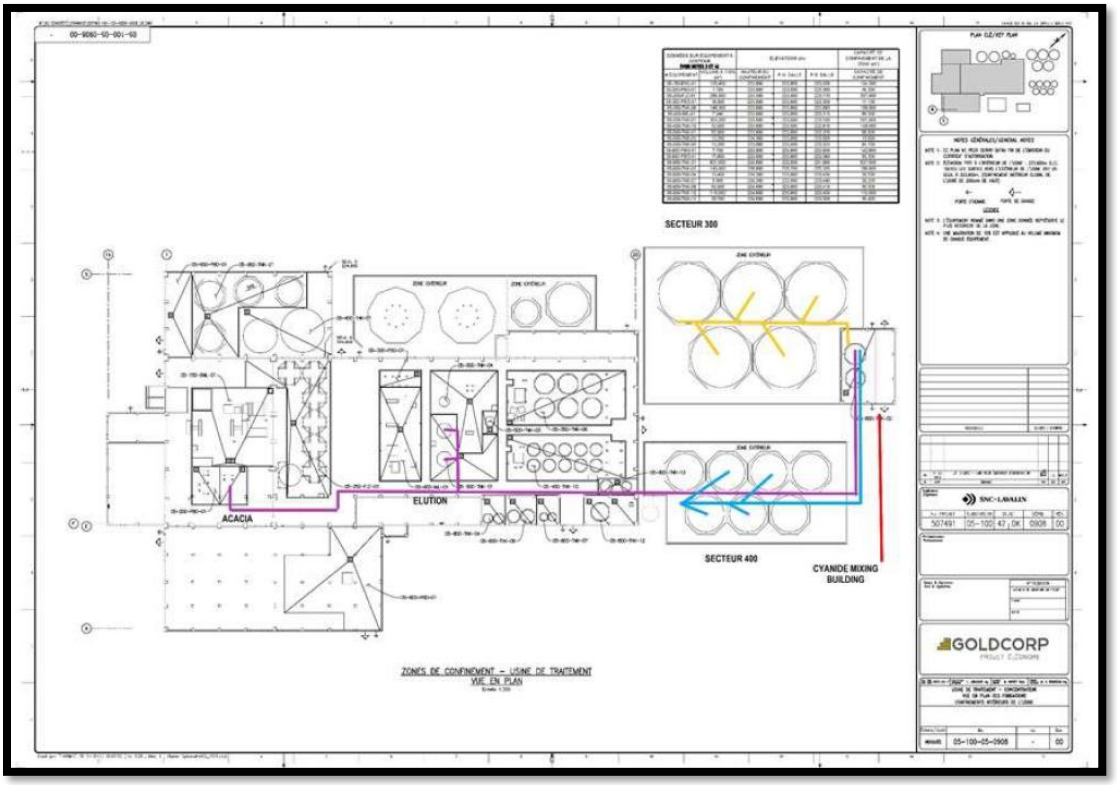

Figure 3 Mill Layout

1.2 FACILITY CHANGES SINCE THE PREVIOUS AUDIT

The following changes (3) occurred with regards to cyanide operations since the previous recertification audit conducted in 2021:

- A piping modification in the cyanide mixing building was implemented during the recertification period. The change was motivated by a health and safety and ergonomic concerns when connecting the isotainer to the cyanide unloading piping system. The change involved a reconfiguration of piping but also entry of the isotainer transport truck from the north garage door after traveling approximately 150 meters on the main service road.
- The area between the mill building and the exterior western wall of sector #300 and #400 secondary containments was made impervious by pouring concrete cement over grade. The area has the capacity to prevent any slurry that could leak from the aerial piping between the leach tanks to the mill building to impact the soil.
- A launder system was installed on pipe rack to further protect the cyanide solution stainless-steel lines. The launder is found between the mixing building and the secondary containment of sector #300 and #400 leach tanks.

2. AUDITORS' FINDINGS

This operation is

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

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

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Date(s) of Audit: November 7th to 12th, 2024

I attest that I meet the criteria for knowledge, experience, and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, as established by the International Cyanide Management Institute (ICMI) and that all members of the audit team meet the applicable criteria established by the ICMI for Code Auditors.

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

PRINCIPLE 1 – PRODUCTION AND PURCHASE

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

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

The operation is

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

Basis for the finding:

D-E is in full compliance with Standard of Practice 1.1 requiring the operation purchase cyanide from a manufacturer that demonstrates it operates in a safe and environmentally protective manner through cyanide code certification. D-E's purchasing of Cyanco's cyanide is guided by a contract agreement valid until December 2025 which stipulates that the reagent will be produced at either the Winnemucca, Nevada or Houston, Texas plants. Both plants are shown as certified facilities according to the Cyanide Code Internet site with recertifications scheduled for January and April 2026.

PRINCIPLE 2 - TRANSPORTATION

Protect communities and the environment during cyanide transport.

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

The operation is

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

with Standard of Practice 2.1

Basis for the finding:

D-E is in full compliance with Standard of Practice 2.1 requiring that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transporters. The bills of lading identified Union Pacific Railroad Company, Solurail Logistique Inc. and truck transporters Transport Nord-Ouest, Inc. These transporters were found to be compliant to the cyanide code under the Cyanco North America Rail & Truck Supply Chain certification according to the July 2022 recertification report.

PRINCIPLE 3 – HANDLING AND STORAGE

Protect workers and the environment during cyanide handling and storage.

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

The operation is

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

with Standard of Practice 3.1

Basis for the finding:

D-E is in full compliance with Standard of Practice 3.1 referring to sound and accepted engineering design and construction practices as well as quality control and quality assurance procedures and spill prevention and containment measures. SNC Lavalin Engineering consultancy was mandated to design and supervise the construction of the ore processing plant as well as the mixing and chemical storage buildings. In December 2012, the consultancy prepared an engineering report with the objective to align the design of the facility with ICMI's requirements. The chemical storage and mixing buildings, adjacent to the ore processing plant, are located approximately 350 meters from Opinaca Reservoir and are located away from people and separated from incompatible materials. The mill complex is surrounded by a network of drainage ditches and surface water catch basins.

D-E has installed level sensors in the cyanide mixing and storage tanks to prevent overfilling. The mine's instrumentation technicians maintain these level sensors on a 24-weeks cycle through a work order system. The auditor reviewed the maintenance history of the level sensors for the recertification period. The cyanide mixing and storage tanks are located inside the mixing building and on a concrete floor. This containment has not changed since the 2021 recertification audit. The solid cyanide is stored inside a dedicated unit of the chemical storage building. The cyanide storage unit is equipped with fixed HCN monitors. Access to the cyanide isotainers is restricted to authorized personnel only. Cyanide incompatible reagents or materials are not kept in the cyanide storage unit.

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

The operation is

☒ **in full compliance with**
☐ in substantial compliance **with Standard of Practice 3.2**
☐ not in compliance with

Basis for the finding:

The operation is in full compliance with Standard of Practice 3.2 which is to 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. D-E receives solid cyanide in isotainers. Field observations confirm isotainers are marked with transport placard upon arrival (UN 1689). The number of cyanide isotainers in the chemical storage building is limited to five units. The isotainers cannot be stacked inside the storage building. The mixing building is designed to receive one isotainer at a time. The last stage of a cyanide solution preparation involves a triple rinse of the empty isotainers. After completion of a cyanide mixing batch, a UN 3414 placard is placed on the isotainer as some leftover liquid may be present. Reagent operators are required to inspect the isotainer for cyanide spillage after a mixing batch is completed. The isotainer is then stored in the cyanide unit of the chemical storage building before being shipped back by Transport Nord Ouest, Inc., for reuse by the manufacturer. D-E developed several operational procedures and work instructions to prevent exposure and release of cyanide during unloading and mixing activities. The mixing procedure details the operation of valves, agitators, pumps, exhaust fans, during mixing and transfer to the storage tank. The mixing procedure and the operator's check list specify personal protection equipment (PPE) and training requirements. Also, the procedure requires two reagent operators to prepare a batch of cyanide solution and they must be in radio communication with the control room operator who can observe the mixing operations from a close circuit video camera system. The cyanide sales agreement between supplier and D-E confirms the reagent will be compliant with Cyanide Code requirements. The auditor's observation of the cyanide addition in leach tank 1 confirmed red colored cyanide solution. The auditor observed the arrival, transfer, unloading and critical stages of the mixing activities to verify compliance.

The operation and maintenance of all cyanide loading, unloading, and mixing equipment is under D-E's responsibility. Frequent inspections of the unloading and mixing equipment are conducted by operators and the metallurgy team using detailed checklists. Identified issues are corrected by the maintenance department in a timely manner.

PRINCIPLE 4 – OPERATIONS

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

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

The operation is

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

Basis for the finding:

The operation is in full compliance with Standard of Practice 4.1 regarding the implementation of management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures. D-E has written control plans and operational procedures for the safe operation of each mill circuits including maintenance schedule in SAP software; including isotainer storage, unloading and mixing (800 sector) as well as mill circuits including crushing and grinding - gravimetry (100 & 200), floatation (250), leaching (300 and 400 sectors), Carbon in Pulp (350 and 450 sectors), elution (500 sector), Acacia plant (200 sector) and cyanide destruction (650 sector). It should be noted that the industrial water treatment plant (IWTP) basins as well as the TSF collection basin are not considered cyanide facilities since monitoring data reviewed has shown cyanide concentration consistently below the 0.5mg/L WAD cyanide threshold value. The procedures are also developed and implemented for other mill activities such as acid wash, carbon stripping and regeneration, backfill paste plant or facilities like the industrial water treatment plant, the tailings storage facility and the storm water retention basins and drainage ditch network. D-E continued using risk assessments and implementing critical control verifications (CCVs). The procedures discuss the risks involved with each task (including unloading, storage, operations, entry into confined spaces, and equipment decontamination) and describe safe work practices, PPE required for the task as well as tools, consumables, work permit and reference training needed. Several plans and procedures were reviewed by D-E during the recertification period.

All plans, manuals, procedures developed by D-E align with design criteria to ensure safe operations and prevent or control cyanide releases and exposures. As the mined ore is subject to variation in quality over time, D-E relies on operational directive (i.e. « Consigne d'opération ») to set operational parameters. The operational directive aligns ore quality, optimal production parameters and mill production design criteria established by SNC Lavalin, the engineering consultancy that designed the ore processing mill and other mining

infrastructure. The operational criteria are defined for all sectors of the mill. D-E inspects process pipelines and valves on a routine basis to ensure they are in good working order.

For the various parameters at the different mill sectors, minimum, target and maximum values are indicated. For example, for sector 150, grinding target tonnage processed per hour is set at 260. In the case of the leach tank #1, #3 and #5 free cyanide concentration in ppm is targeted at 110, 100 and 90 respectively (300 circuit). The target pH is 10.5 while minimum and maximum values are set at 10.3 and 10.7. Similarly, procedures have been developed to ensure sound running of mill equipment including specific measures needed for alignment with Code or legal requirements. The procedures detail the actions to be taken by the operator, PPE required for the task as well as tools, consumables, work permit and reference training needed.

The management of change (MOC) at D-E is represented by two formalized procedures. One procedure addresses mechanical change, and a second procedure looks after the need to modify computer programing in the DCS (DeltaV Control System) system. The MOC process for mechanical projects, either major or small scale, is similar to the one audited in 2021. It consists of four stages involving a completeness review of the request, an approval for an assessment, a prioritization of the request and lastly an assessment and final approval of a request. The sector general foreman, the project manager, the owning department director as well as the representatives of the Health and Safety and the Environment departments are solicited to provide input and advice on a request for a modification. The second type of MOC at D-E involves computer programing in the DCS system. This process is designed to maintain the integrity of the DCS system. The automated program modification request process is initiated by the operator or the Cyanide Code Lead and Metallurgy supervisor but will involves technicians or instrumentation or process engineers for definition of the request. The validation stage requires the implication of the Metallurgy supervisor, foreman, senior metallurgist, general foreman and plant manager depending on the risk induced by the modification request. During the audit, a major project involving a hose and piping modification in the mixing building as well as a smaller scale project designed to replace a flexible carbon feed line were reviewed. The project documentation audited included Pre-Start Safety Reviews, hydrostatic testing and request forms. The MOC process is considered implemented and followed by D-E.

D-E has developed contingency procedures and plans for cyanide-related process deviation, planned or unplanned shutdowns, closure or temporary cessation of activities. These are partly represented by the listed control plans established for the mill related equipment, which may or may not contain cyanide solution. There is no significant change to these plans since the 2021 recertification.

D-E mill operators and the Metallurgy team inspect the cyanide storage, mixing and process areas on a shift and weekly basis, including, some inspections are also conducted on a monthly, quarterly, bi-annual and annual frequency. Inspections are documented and conducted detailed checklist. The inspection program for the mill is driven by SAP work orders

system. Each work order form is associated to a specific equipment. The program includes both proactive (preventative) and reactive (corrective) maintenance where applicable. Tanks in the mixing building are visually inspected prior to mixing events (about once every two days) and during a cyanide solution preparation, which last about 8 hours. Tanks in the mill building are also inspected on a weekly basis. Non-destructive testing (NDT) is conducted annually by a certified contractor with records maintained in SAP. Secondary containments, sumps, level sensors, and sump pumps are visually inspected, and findings noted on the operating sheets. Corrective measures are planned through SAP and a timeline for maintenance is determined based on the severity of the deficiency. All records from inspections originating from SAP are kept by the maintenance department planners. A mill "operational register" is prepared and reviewed by mill supervisors. The preventive maintenance activities include multiple planned shutdowns each year. The maintenance program is based on manufacturer of equipment recommendations or best management practice from experience of site conditions. D-E regularly maintains cyanide-related instruments such as HCN monitors; flow meters; pH meters; and tank level sensors.

D-E operation inspects cyanide facilities on an established frequency deemed sufficient to ensure and document that they are functioning within design parameters.

The energy supply is provided by the public utility, Hydro Quebec. In case of failure of the grid, D-E is equipped with twelve (12) auxiliary power generators in the industrial area including six (6) for the mill and paste backfilling buildings alone. The emergency power supply is designed to maintain critical equipment operating and prevent accidental cyanide release or exposure. The allocation of emergency power is driven by a "control philosophy" document prepared by SNC Lavalin consultancy, which establishes delivery priorities to critical equipment as well as maximum load usage per generator. The generators are associated with a Uninterruptable Power Supply system enabling a transition from the grid to the emergency power supply. D-E furthered its maintenance checklist to align with the maintenance recommendations from the Canadian standard CSA C282.

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

The operation is

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

with Standard of Practice 4.2

Basis for the finding:

The operation is in full compliance with Standard of Practice 4.2 regarding systems to minimize cyanide use and limiting cyanide concentrations in mill tailings. D-E optimizes cyanide usage at the mill through regular metallurgical tests to update the set of Operation Guidelines (i.e. Consignes d'Opération) for each sector of the mill. The Operation Guidelines

were last reviewed in November 2024. Cyanide addition rates in the Consignes d'Opération is first presented for the Gravity Concentrator and Intensive Cyanidation circuit (sector 200), where a volume of 400 liters of cyanide is targeted. Cyanide addition targets are also established for the Leaching circuits (300 and 400 sectors). For example, in sector 300, free cyanide concentration of 110 ppm, 100 ppm and 90 ppm is aimed for leach tank # 1, # 3 and # 5 respectively. These concentrations were identical during the 2021 recertification audit but higher according to the 2018 certification audit report (i.e. 205, 195 and 185 ppm). At Elution (500 sector), cyanide concentration is required to be maintained between 1,000 (minimum) and 1,200 (maximum) ppm values (same in 2020).

Weekly reagent reports from Metallurgy supervisors are shared with superintendent and confirms cyanide concentration in circuits. Similarly, monthly reagent consumption and associated to mill operation costs. The weekly follow-up started in January 2023. The monthly monitoring of cyanide consumption was in place in 2021. The more robust review of cyanide consumption is driven by Eleonore's "Full Potential" continuous improvement initiative. At D-E, the program aims to lower SO2 footprint generated and monitor cyanide on a weekly basis to allow more proactivity in achieving targets. The addition of cyanide in a cascade arrangement with control valves in circuit 400 provided optimal results at minimal cost.

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

The operation is

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

with Standard of Practice 4.3

Basis for the finding:

The operation is in full compliance with Standard of Practice 4.3 regarding the implementation of a comprehensive water management program to protect against unintentional releases of cyanide. D-E has implemented a comprehensive water management model to protect against unintentional releases, resulting in Full Compliance with Standard of Practice 4.3. The site's water balance is updated on a regular basis utilizing actual data from the facility as well as precipitation data from the two site Weather Stations.

Daily, weekly, and monthly inspections ensure that the water levels within the ponds are maintained at specified levels. All recorded levels within recertification period were within the operating range at the Tailings storage facility and The Industrial Wastewater Treatment Plant.

D-E measures precipitation on site. One meteorological station is located at the airport and one additional rain gauge is located near the concrete plant. The meteorological data from the site are compared with the data set from the La Grande station and are used to inform the water balance model in GoldSim.

Within the recertification period, no event occurred that triggered the need to revisit design assumptions of ponds and impoundment.

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

The operation is

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

Basis for the finding:

The operation is in full compliance with Standard of Practice 4.4 regarding the implementation of measures to protect birds, other wildlife from the adverse effects of cyanide process solutions. D-E is maintaining a WAD cyanide concentration of 50 mg/l or less in open water. The review of the fauna incident log did not identify any event or mortality related to ponds or impounded water. Therefore, maintaining the current WAD cyanide concentration in open water is effective in preventing significant wildlife mortality. D-E is in Full Compliance with Standard 4.4.

There is no heap leach facilities at the operation.

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

The operation is

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

Basis for the finding:

The operation is in full compliance with Standard of Practice 4.5 regarding the implementation of measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water. The facility has one final effluent that directly discharges to surface water, and no direct discharge that is > 0.5 mg/L WAD CN. D-E has established an exhaustive monitoring program at the site based. The monitoring results for surface water downgradient to the operations indicated free cyanide concentration values under 0,022 ppm for the entire recertification period.

The review of the fauna incident log did not identify any event or mortality related to ponds or impounded water. Therefore, maintaining the current WAD cyanide concentration in open water is effective in preventing significant wildlife mortality.

All wastewater generated from the industrial zone, the mine or the TSF surface drainage is treated before discharge takes place in the natural receptor. D-E discharges treated industrial waters in the Opinaca Reservoir. The maximum concentration measured within the recertification period was below 1 ppm.

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

The operation is

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

Basis for the finding:

The operation is in full compliance with Standard of Practice 4.6 requiring the operation to implement measures designed to manage seepage from cyanide facilities to protect uses of groundwater. D-E operations protect the groundwater through different strategies. These are represented by the destruction of cyanide in tailings to 1 ppm, the filtration of tailings to limit humidity to 18% and the use of HDPE geomembrane-liners in the TSF and various surface water collection ponds.

D-E installed and monitors groundwater from a series of 46 piezometers or monitoring wells: 6 in the waste rock stockpile sector, 13 in the landfill sector, 15 in the tailings storage facility, 3 in the petroleum storage sector, 5 in the Industrial wastewater treatment plant sector and 4 downgradient to the mill buildings.

Underground backfilling with both sulphide and, when needed, non-sulphide mill tailings is also conducted at D-E. The potential risks on workers were assessed and continues to be monitored in the paste backfill building for HCN gas and CNWAD concentration in mine waters pumped and treated at the IWTP. The mine water is analyzed daily to ensure the risk is managed and monitored effectively to prevent impacts on workers health and groundwater quality.

Monitoring data from the recertification presented in the annual monitoring reports and databases maintained by D-E indicated that water management and other measures at the site are effective in protecting the groundwater quality and the workers health and safety.

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

The operation is

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

Basis for the finding:

The operation is in full compliance with Standard of Practice 4.7 regarding the provision of spill prevention or containment measures for process tanks and pipelines. D-E provides containment measures for cyanide facilities at unloading, storage, mixing and process solution tanks. The containment infrastructure remained the same since the last recertification except for two improvements. The first improvement concerns the area between the contained leach tanks (circuit 300 and 400) and the mill building. At the time of the 2024 recertification audit, the area was made impervious with a concrete slab and sump to eliminate the risk of a spill incident involving cyanide pulp directly on the ground. The second improvement include the installation of launders on pipe rack holding the stainless-steel cyanide solution lines between the mixing building and the circuit 300 and 400 leach tanks. Secondary containments for cyanide unloading, storage, mixing and process tanks are sized to hold a volume greater than that of the largest tank within the containment and any piping draining back to the tank, and with additional capacity for the design storm event where necessary.

D-E's mill control strategy does not authorize discharge from secondary containments to the environment. There are procedures in place for the management of water collected in secondary containment areas and a management plan where water collected in the sumps is pumped to various process tanks.

All cyanide solution piping is aerial when leaving the mixing building (#800) and inside the mill building. There is no buried pipeline with cyanide solution or slurry at D-E. During the recertification period, D-E installed a launder system for the stainless-steel cyanide lines between the mixing building and the secondary containment in sector 300. The project aimed at providing additional containment. Moreover, the cyanide solution lines were also inspected by external consultancy in 2023. The report indicates no significant loss in cyanide solution lines thickness. The mill complex is surrounded by a network of ditches that would contain and direct any spilled cyanide solution or slurry to the catch basins. The risk of cyanide release to surface water has been evaluated and the controls implemented are considered adequate. D-E replaced all its cyanide lines in 2018 after witnessing corrosion issues.

Stainless steel piping was installed in circuits #200, #300, #400, #500 and #800. Solution tanks are made of carbon steel and are regularly subjected to thickness measurements from non-destructive testing. These materials are 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**
☐ in substantial compliance **with Standard of Practice 4.8**
☐ not in compliance with

Basis for the finding:

The operation is in full compliance with Standard of Practice 4.8 regarding the implementation of quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications. The 2018 cyanide code certification report from Golder & Associates confirmed D-E implemented a QA/QC program during the construction of the cyanide facilities in 2013 and 2014. During the 2024 recertification audit, QA/QC activities were completed for the piping improvement project in the mixing building. The QA/QC process started with the definition of suitable piping material by SNC Lavalin consultancy. D-E has retained its QA/QC records on site in a dedicated archive room in the office section of the mill building. The archive room contains hard copy of drawings and QA / QC reports for the construction of the facility. Electronic records are also available. The 2022-23 QA/QC records for the piping improvement project in the mixing building are in electronic format. D-E has used appropriately qualified personnel to review QA/QC records to ensure that the cyanide facilities were built as intended. The various 2022-23 QA/QC records for the piping improvement project in the mixing building contain the signature of professionals. The signatures include but not limited to PROMEC and Socomec Inc. quality specialists and material testing professionals at ASC Engineered Solutions and Mistras.

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

The operation is

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

Basis for the finding:

The operation is in Full Compliance with Standard of Practice 4.9 requiring that operations implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and groundwater quality. D-E's Environmental Sustainability Department is led by engineering, environmental science and geology university trained professionals. In addition, all department supervisory personnel have several years of experience in the mining sector. The facility has developed procedures for monitoring and utilizes a sampling and reporting schedule to guide monitoring plans. The site's environmental monitoring program was designed and prepared by SNC consultancy and approved by the authorities. Sampling procedures specify how and where samples should be taken, sample preservation techniques, chain of custody procedures, shipping instructions, cyanide species to be analyzed, and quality assurance and quality control requirements. The sampling protocols and sampling program are approved by the Quebec Ministry of Environment, based on official sampling methodologies issued by the regulators. D-E inspects for, documents and reports wildlife sightings including any mortalities that may be associated with cyanide.

Chain of custody is ensured through individual sample numbers attributed by the Environment team.

Monitoring of surface and groundwater is conducted in accordance with permit requirements as well as for internal monitoring purposes. Monitoring frequencies are considered adequate to characterize the medium being monitored and to identify changes in a timely fashion.

PRINCIPLE 5 – DECOMMISSIONNING

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

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

The operation is

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

with Standard of Practice 5.1

Basis for the finding:

The operation is in Full Compliance with Standard of Practice 5.1 requiring the planning and implementation of procedures for effective decommissioning of cyanide facilities. D-E updated its mine restoration plan in 2024 as required by its environmental permit and other legal obligations. Appendix K of the mine restoration plan refers specifically to the decommissioning activities for the cyanide related facilities. Section 4.1 of Annex K describes the decommissioning principles which includes but not limited to treating remaining cyanide solution in isotainers, storage tanks, distribution lines at the destruction unit as well as treating residual slurry and dismantling and triple rinsing cyanide related equipment, all concrete foundation and structures exposed to reagent solution. Concrete structures may be crushed and buried unless an agreement with the local community determines it may be left in place for future use. The timeline for the decommissioning activities is presented in section 6 of the consultancy report. The decommissioning activities is estimated to commence in 2030 as the life of mine was extended to 2029. The D-E restoration plan is reviewed every five years as per regulatory requirement.

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

The operation is

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

with Standard of Practice 5.2

Basis for the finding:

The operation is in full compliance with Standard of Practice 5.2; establish an assurance mechanism capable of fully funding cyanide related decommissioning activities. The cyanide-related decommissioning costs are updated when the decommissioning plan is reviewed every

five years. D-E updated the cost to fully cover for third party implementation of the cyanide-related decommissioning plan as identified in Appendix K of the 2024 mine restoration plan.

The 2024 cost update by WSP consultancy presents a figure of 19,343,236 $CAD. These costs relate to building demolition costs and rinsing of cyanide equipment, concrete foundation and infrastructure. The 2024 estimate included the review of the cyanide-related decommissioning costs. No material changes were made to the equipment and infrastructure that impacted the decommissioning costs during the recertification period.

An irrevocable standby letter of credit for the benefit of the Quebec Ministry of Energy and Natural Resources was established as a financial mechanism for mine decommissioning and closure which includes cyanide-related facility decommissioning activities. The standby credit letter from the Bank of Nova Scotia is for a new amount of 57,337,924.00 $CAD and is applicable for the mine restoration plan.

PRINCIPLE 6 – WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

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

The operation is

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

Basis for the finding:

The operation is in Full Compliance with Standard of Practice 6.1 which requires that the facility identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them. D-E provided a list of 489 written procedures, control plans and work instructions for the mill operations. Out of the 489, 81 are identified as cyanide related. The procedures address task execution, maintenance of cyanide-related equipment and PPE used to minimize worker exposure. The procedures provide step-by-step task description with photos/illustrations and risk management advice as additional information.

Each procedure presents the material, training, permit and PPE requirements to execute the work. The procedure steps are supported by illustration when deemed required and list some advice and risk management opportunities. D-E reviews its procedure every three years.

The maintenance work orders also present a cyanide exposure warning along with PPE and decontamination consideration. D-E general and specific work permit process captures cyanide exposure risk from a task involving a confined space entry element. In this instance, the operator will follow the additional referenced procedure.

Nonroutine task at D-E requires a Job Hazard Analysis (JHA). Should a task become recurrent, the JHA will be converted into a procedure. Non-routine tasks are discussed during pre-shift briefings (huddles). When creating a creating a procedure, at least 4 people are involved in its development: operators or supervisor/foremen from both rotation teams.

All procedures involving a potential for cyanide exposure contain a warning to this effect and a fully developed PPE and valid training requirement section (section 5 of every procedure). When Cyanide risk is present, the procedure includes a purple ribbon. This obligation is in agreement with D-E's health and safety policy, the site-wide signage of cyanide hazard requiring the use of PPE and the awareness and advance training of personnel to this effect.

For the mill, the IWTP, the tailings storage facility and surface water drainage and retention infrastructure, pre-work inspection is conducted on a shift basis. The pre-work inspection can be discussed during safety huddles at the start of a shift when work cards are distributed by the supervisor to the operators. The need for pre-work inspection is documented in the work card system and for review by supervisors (first section on inspection).

D-E solicit operators and maintenance employees input through pre-shift safety huddles, work card, job hazard analysis and work permit processes implemented at the site.

All procedures must be reviewed on a 3-year cycle involving operators and supervisors/foremen. Procedures are approved by Senior advisor, senior metallurgist, superintendent or the director. Reportedly, feedback is generally provided by writing personal notes on a problematic procedure and submitting it to foremen. In addition, the annual procedure review process lead by supervisors and includes the participation or sign-off of operators.

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

The operation is

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

with Standard of Practice 6.2

Basis for the finding:

The operation is in Full Compliance with Standard of Practice 6.2 that requires that the facility operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures. The operating parameters are documented in the "Consignes d'opérations". Where applicable, the pH operational criteria are defined for the mill circuits. Automated equipment add caustic or lime reagent in the process and measuring instruments provide data on pH value to prevent the release of HCN gas in the buildings. The pH data is captured in the DCS IT system accessible to control room as well as mill operators who can adjust the reagent or intervene during an equipment failure. Over the years, D-E reviewed the consignes d'opérations. Where applicable, the pH operational criteria are defined for the mill circuits.

D-E has identified areas and activities where workers may be exposed to cyanide and require the use of PPE, including portable multi-gas detectors that include HCN reading capability, and installed fixed HCN monitors in various areas of the mill building. The evacuation alarm is set at 4.7 ppm. The use of portable HCN monitors is mandatory for tasks where workers may potentially be exposed to cyanide. Portable HCN monitors alarm is set at 3 ppm. Should the 3 ppm alarm be triggered, the worker must secure zone and prepare to evacuate to another zone. Should the HCN monitor (fix or portable) measure 4,7 ppm, the workers must

evacuate the zone. Should fix detectors in two adjacent zones be in alarm states, the mill is completely evacuated.

D-E has 5 Industrial Scientific MX6 (for confined space entry) and 20 Ventis Pro5 portable multi-gas detectors, and 32 Dräger Polytron 8000 fixed HCN monitors in various areas of the mill building. Operators are responsible for performing bump test prior to usage of portable HCN detectors. However, bump testing is performed automatically on a monthly basis. Calibration records are logged. The charging station is linked to the manufacturer's maintenance IT platform, which can detect and inform D-E when a cell change or other maintenance is required.

For fixed HCN detectors, an instrumentation technician is responsible for ensuring that the fixed HCN detectors undergo calibration every month. In addition, a monthly preventive maintenance verification is performed. D-E maintains calibration and verification records of the fixed detectors electronically.

D-E has posted warning signage at the entrance of the isocontainer storage, mixing and mill buildings. The signage is in both French and English languages. The signage is also present at different locations inside the mill including at different elevations where the presence of walkways is observed. The information on the signs varies from warnings regarding cyanide presence to the mandatory use of portable HCN detector, including the prohibition of eating and drinking except in designated areas. Specific cyanide signs provide guidance when handling and storage, first aid measures and exposure symptoms.

Cyanide arrives at the facility dyed red.

31 emergency showers and eyewash stations are distributed among all sectors of the mill to ensure easy access at all times where cyanide exposure risk exist. Cyanide awareness and mill induction training material refer to emergency showers to decontaminate a potential victim. The showers are linked to an audible alarm and an alert appears on the control room screen if they are used. Emergency showers eyewash stations are tested prior to each mixing or maintenance task on cyanide equipment if applicable. In addition, D-E has implemented a routine inspection program of the mill areas, which includes inspections and testing of emergency showers, eyewash stations and fire extinguishers. SNC-Lavalin consultancy designed the mill building and included dry chemical portable fire extinguishers according to the Canada National Building Code. Inspection tags of portable fire extinguishers indicated monthly inspection is conducted and the inspection covers the fire extinguisher's location, installation, general condition, type, pressure, nozzle condition, safety pin and inspection tag. Annual verification and hydrostatic testing is conducted by an external company and logged by D-E.

D-E has provided piping and tanks containing cyanide solutions with signs indicating its content with purple-coloured labels with a cyanide mention in white. The frequency of this identification along a stretch of piping is considered adequate. As indicated previously, the mill cyanide solution piping system was completely replaced in 2017 and 2018 and signage

on piping was part of the upgrade project. Induction and cyanide general awareness training describe the colour-coding system used to identify cyanide piping and equipment. The flow direction of the solution is also indicated on the piping.

In the mixing and mill buildings, mixing, distribution, leach, CIP tanks and Acacia Reactor, equipment included a physical barrier in addition of the cyanide content signs.

A 5S (Sort, Set in Order, Shine, Standardize, and Sustain) monthly tour is conducted to identify worn off label, including cyanide. When a worn off/missing label is reported, it is fixed immediately.

D-E provides safety data sheets (SDS) for reagents in the storage building. These hardcopies SDS are maintained in a weatherproof box at each side of the building's doors. The hardcopies SDS are both in French and English and updated, when necessary, as per regulatory obligation. In the mixing and mill buildings, reagent SDS are available in both languages in SharePoint.

D-E implemented a corporate established event reporting and investigation procedure at its mine. The event reporting and investigation procedure is applicable to any loss of cyanide bearing material (tailing, solution, slurry) containing ≥0.5 mg/L CNWAD outside of engineered containment as well an exposure incident to employees. The procedure clarifies timeline for reporting, notification process, a quality review of the notification and the investigation methodologies to be used according to the event severity scale provided.

The review of investigations for cyanide-related events allowed to validate classification, investigation results and that action plans were completed in a timely manner following an event.

To ensure adequacy to cyanide response, mock drills are conducted on a yearly basis and during the yearly Hazmat training sessions using an Emergency Response Plan (ERP) scenario.

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

The operation is

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

Basis for the finding:

The operation is in Full Compliance with Standard of Practice 6.3 which requires the development and implementation of ERP and procedures to respond to worker exposure to cyanide.To this effect, Cyanokits (Hydroxocobalamine powder for infusion) were observed at the health clinic. Cyanokits are stored in accordance with the manufacturer recommendations and are verified every two weeks by the nursing staff. The health clinic and the Ambulance as well as the Mill are equipped with an automated external defibrillator, oxygen with valved

mouthpiece (ambulance, mill and mixing), and other first-aid equipment observed throughout the mill buildings. The health clinic is staffed with two registered nurses at all time and an assigned physician at the Chibougamau Hospital. An emergency response team (ERT) is present on-site with 26 members. Sufficient first aiders are trained in every department. Water for emergency body showers is available throughout the mill and fire extinguishers were visible throughout the mill facility. All emergency equipment were found in good condition and are part of an inspection program.

D-E's health clinic staff developed a protocol for an emergency evacuation for medical reasons. The protocol identifies the roles and responsibilities of the nursing staff, the assigned physician and the security officer responsible for requesting an air evacuation.

All operators working in the mill or mixing building are equipped with personal communication device, either a SONIM Technologies phone, two-way radios and or classic mobile phones. The "Mill" network is used on the radios. The (819) 865-0070 is the emergency phone number at D-E. In case of an emergency, the Garda contracted security guard will respond to the call and take subsequent actions. The ERT is notified using a dedicated notification system for First Responders.

Alarm switches are present at strategic cyanide locations at the plant. Emergency showers, eyewash stations, and fixed HCN gas detectors are connected to the alarm system.

D-E developed and implemented written emergency response plan (ERP) and specific procedures to respond to plausible cyanide incident scenarios that include worker exposure: High HCN gaz level, affected employees, HCN spill, medical decontamination (gas or inhalation), person decontamination (liquid, ingestion or absorption through the skin and eyes), cyanide release during unloading/mixing, cyanide release during transport (on-site/off-site), release during a fire emergency, cyanide release due to infrastructure issue, overfill of reservoir / containment, release due to current loss, HCN release at the IWTP, HCN release during Detox, HCN release at the TSF. The ERP is maintained up to date at least annually and is ongoing a complete revision every three years to review scenarios and Emergency measures protocols.

The ERP and procedures describe exposure risks and limits, emergency response equipment, sodium cyanide spill response procedures, HCN response procedures, and first aid measures. The ERP is reviewed annually.

PRINCIPLE 7 – EMERGENCY RESPONSE

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

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

The operation is

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

Basis for the finding:

D-E is in Full Compliance with Standard of Practice 7.1 which requires that the site prepare detailed emergency response plans for potential cyanide releases. D-E developed and implemented written emergency response plan and specific procedures to respond to various cyanide incident scenarios that include worker exposure. The latest revision is 2022-10-29. Minor modifications (contacts, name) are made when required.

The ERP has a cyanide-specific section that covers the following scenarios: High HCN gas level, affected employees, HCN spill, medical decontamination (gas), person decontamination (liquid), cyanide release during unloading/mixing, cyanide release during transport (on-site/off-site), release during a fire emergency, cyanide release due to infrastructure issues, overfill of reservoir/containment, release due to current loss, HCN release at the IWTP, HCN release during Detox, HCN release at the TSF.

The ERP section 26B on cyanide spill incident contains general guidance on cyanide antidote usage, oxygen administration and first aid kits. The specific response measures to be implemented by the ERT members are detailed in the 11 scenarios that follow the general guidance section. These specific measures range from building evacuation, security perimeter delineation, incident command and refuge centre establishment, spill containment and spill recovery process, decontamination of building or sector, sampling of affected area, decontamination of ERT members, waste management and process return to the owner. The response measures ends with an incident investigation process and reporting to authorities.

D-E assumes contractual responsibility of the supplied cyanide once the isocontainer is unpinned from the transporter's tractor truck inside the chemical storage building. The cyanide supplier, Cyanco, is responsible for the transport and delivery of cyanide to the facility, including responding to spills. The contract with Cyanco specifies this requirement.

The nearest Cree community is located approximately two hundred kilometres from the mine site. It is unlikely that the community would be impacted by a cyanide spill occurring at the mine. However, an event notification process is implemented in case of an emergency.

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

The operation is

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

Basis for the finding:

The operation is in Full Compliance with Standard of Practice 7.2 that requires that the facility involve site personnel and stakeholders in the planning process. The D-E ERP has been developed internally by mine managers and involved the ERT members for content validation. The Wemindji Cree community or the provincial government agencies did not directly participate in the development of the ERP but were kept informed about the plan. However, an impacts and benefits agreement (IBA). Regular committes meetings are conducted with various stakeholders. Public presentations also occurs on cyanide-related risks and mitigations measures.

Due to relative isolation of the mine site, D-E does not rely on external responders to address an emergency, including a cyanide emergency.

Twenty-six (26) mine employees constitute the ERT. There is no external ERT members taking part in emergency response activities, but all levels of intervention are available at the site: workers, first aiders, first responders, fire fighters, ERT and infirmary services.

The ERP includes the contact for external entities that might participate in an emergency response: Industrial security, doctor, mine rescue, hospital, air carriers, airport, government agencies, Quebec safety and civil security, Commission des normes de l'équité de la santé et sécurité au Travail (CNESST). Emergency planning and response process rely only on D-E resources due to the mine location.

The facility has an agreement for medical transportation off-site in case of a cyanide exposure requiring medical treatment and with the Chibougamau Hospital medical staff to implement the cyanide exposure treatment and administer cyanide antidote accordingly.

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

The operation is

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

Basis for the finding:

D-E is in Full Compliance with Standard of Practice 7.3 which requires that the site designate appropriate personnel and commit necessary equipment and resources for emergency response. The D-E ERP is comprehensive is maintained up to date at least annually. A complete review is conducted every three years to review scenarios and Emergency measures protocols.. It presents information pertaining to emergency response (ER) coordinator and alternate coordinator, their role and responsibilities, members of the ERT and their responsibilities, training and competency needs for ERT, call out process to ERT, equipment available and its inspection requirements. The routine inspections of ER equipment were conducted during the recertification period as shown by the review of records.

There are no external entities playing a role in the immediate response to a cyanide emergency. However, D-E as planned for airlift medical evacuation and physician availability to assist site nurse if needed. The section 09 of the ERP on internal and external resources list useful names and contact coordinates in case of emergency.

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

The operation is

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

with Standard of Practice 7.4

Basis for the finding:

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

The ERP includes the contact for external entities that might participate in an emergency response: assigned physician, mine rescue, clinic and hospital, ambulances, ground transportation companies, air transporters, air carriers, airports, government agencies, Quebec safety and civil security, CNESST. A Crisis Management Plan is also established and includes details to contact the public authorities and the media.

Operational communications and intervention coordination are detailed in the ERP for plausible scenarios.

D-E has established a procedure to ensure that the ICMI is notified of any significant cyanide incident. No incidents have occurred to date that required reporting to the ICMI.

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

The operation is

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

Basis for the finding:

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

The ERP section 26B documents 11 different cyanide emergency scenarios and their emergency response measures to be implemented to contain and recover a liquid or solid release under dry or wet conditions. The ERP outlines that cyanokits (4) are available at the infirmary and are administered as needed by the nursing staff, responsible for preparing the antidote. All nursing staff present at D-E is competent to administer in vitro antidote and to use cyanokits. The scenarios always include contacting Canutec. All spills are contained and contaminated soil and water are recovered, placed in proper containers.

The ERP scenarios address the management of HCN waste and HCN contaminated waste and prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released.

Following a spill, a sampling plan is developed and approved a qualified person accordance with D-E sampling procedure. A confirmatory sampling is conducted after cleanup, and the sample is analyzed in an accredited laboratory. The sampling procedure identifies which analytical parameters will be used to verify residual concentration of cyanide in contaminated soil. The applicable provincial soil quality criteria is used to determine full remediation and found in the procedure.

The contaminated soil or soil used as a berm is managed according to D-E Spill Management procedure. Depending on volume of contaminated soil, the material is either returned to the process or disposed of at an authorized site through a specialized vendor.

The drinking supply at D-E is from a groundwater source, upgradient to all mine facility locations and protected from potential adverse impact by cyanide. However, D-E keeps a drinking water supply in bottles and can have potable water delivered by truck if necessary.

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

The operation is

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

Basis for the finding:

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

The D-E Emergency Response Plan is comprehensive and is maintained up to date at least annually. A complete review is conducted every three years to review scenarios and Emergency measures protocols. The last complete revision was performed in February 2022. Page 2 of the ERP presents the modification history of the ERP. No significant modifications to on-site processes, equipment and infrastructure occurred since the last ERP update triggering the need for a substantial update.

Mock drills are conducted during the ERT Hazmat yearly refresher trainings provided by the Centre d'Expertise en Formation Prévention Industriel (CEFPI). Mock drills involving operations are conducted also conducted on an annual basis following the Simulation Calendar established for a 5-year cycle. The mock drills address cyanide release and exposure scenarios appropriate for the operations. In a remote context, D-E has the resources internally for cyanide emergency response. The mock drill within the recertification period tested the entire cyanide emergency response from the initial emergency callout notification through to the close-out of the response process.

The simulations are documented in post-mortem reports. The reports provide recommendations to improve the efficiency of the execution of the response procedure.

No significant cyanide incident occurred at D-E during the recertification period.

PRINCIPLE 8 – TRAINING

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

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

The operation is

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

Basis for the finding:

The operation is in Full Compliance with Standard of Practice 8.1 that requires that the facility train workers to understand the hazards associated with cyanide use.

A training matrix identified the cyanide training requirement for 32 mill positions. All personnel that go through mill induction receive the general cyanide training through an e-learning. A passing grade of 100% is required.

D-E has established a 12-month refresher period for cyanide training for both employees and contractors potentially exposed to cyanide. Training records are retained and easily traceable in Cognibox and SafeContractor.

The written training material is inclusive of the following elements: recognizing the cyanide materials present at the site (isocontainers, red liquid form during use); symptoms of exposure and health effects of cyanide; paths of human exposure; hydrogen cyanide exposure risk and detection; mine site areas of potential exposure; emergency measure (call in number) in case of exposure; and finally protective measures related to handling.

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

The operation is

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

Basis for the finding:

The operation is in Full Compliance with Standard of Practice 8.2 which requires that the facility train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment. D-E developed a Mill Employee Training Program document supported by a training requirements matrix that identifies training that is required prior to working with cyanide. The training program highlights the strategy taken to ensure safe working procedures are followed and accidental release of cyanide is prevented. A cyanide-specific training is required for all mill workers. The Cyanide training has to be completed on a yearly basis. A passing grade of 100% is required.

For sector-specific training, the training program is based on 12 distinct "training guides", one for each Mill sector as well as industrial wastewater treatment plant (IWTP) and reagent operator duty. The guides are a collection of all applicable procedures employees must integrate in order to execute tasks safely and without release to the environment. An experienced colleague (i.e."Compagnon") reviews each procedure with operator before following training with practical execution exercise. Operators are evaluated on their execution by their supervisors. These supervisors are also responsible for conducting task-based observations of operators performing their work after successful completion of the training guide. All training guides verified were signed off and complete.

Task-based observations (TBOs) by supervisors cover all procedures related to cyanide including receiving, off-loading, mixing, decontamination and inspections. All procedures involving cyanide management are identified with a purple cyanide warning. Training materials and procedures include content on minimizing risk to worker health and safety. Experienced workers are training new employees. Completed training is signed off by a supervisor and approved by the process foreman or general foreman. The TBOs are tracked by D-E for completion. Any deviation from the operational procedure will result in retraining and additional TBO.

Foremen conduct task-based observation during the work card review and as part of the Critical control Verification program. All foremen must conduct at least 10 CCVs per month that covers several themes, including hazardous chemicals. Task-based observations are documented in Forwoodsafety ensure corrective actions are implemented. CCVs are monitored for completion and key performance indicators on CCVs are presented daily to ensure the monthly objective is met and the operations remain compliant.

The training elements necessary for each position involving cyanide management are found in the awareness training material or directly from the operating procedures used as training material within the training guide. The operating procedures identify the elements necessary for safe performance, including task descriptions, PPE and emergency response. The completion of training will have involved task-based observations by trainers. Prior to receiving operational and cyanide-related training, D-E will provide to operators

approximately four consecutive working shifts of basic health and safety training including Lockout/TagOut, PPE, lifting equipment and confined space entry.

Training records, documenting training received during an employee's entire period of employment, are maintained. Training records indicated the name of the trainee, date, training course, and grade (if any).

Only trained employees can access the mill. Garda is in charge of monitoring all new hired employees. Untrained personnel can only access offices until training is completed.

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

The operation is

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

with Standard of Practice 8.3

Basis for the finding:

D-E is in Full Compliance with Standard of Practice 8.3 that requires that the facility train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

In addition to cyanide awareness training, mill operators and maintenance personnel receive specific mill-related risk induction training. The training includes the topic of cyanide emergency response procedure. In case of a cyanide release or exposure, the expected operator's reaction is to call the site security, attend an injured person without exposing oneself and if the injured person is contaminated with a cyanide solution, proceed with decontamination of the operator and provide oxygen while waiting for the ERT members to show up and ensure relief. Additional training of operators includes PPE and portable gas detector use as well as first aid. D-E maintains electronic training records for the ERT. Training records indicated the name of the trainer and the employee, the training date, the topic or procedure covered in the training event.

The training guides cover the sector spill specific procedure. The loading/unloading spill procedure is covered in the Reagent Operator training guides. Other spill would be managed under the environmental procedure (outside) or the ERT team (inside).

D-E maintains its own on-site emergency response capabilities, and their Emergency Response Plan does not rely on external parties. Any spill response activity will be performed by the emergency response team (ERT) who are Hazmat trained personnel. Training records demonstrated the delivery of training to relevant workers. Training records and training plans for the ERT show coverage of foreseeable cyanide emergency scenarios. In addition to hazmat, ERT members train for fire, mine rescue and first responder interventions.

An assigned physician can be reached at any time by D-E nurse to authorize an air medical evacuation to Chibougamau Hospital, if required. The Hospital medical staff is prepared to implement the cyanide exposure treatment and administer cyanide antidote accordingly.

Refresher training in cyanide awareness, which includes exposure recognition and emergency response, is provided annually. Procedure reviews, including emergency response procedures, are conducted annually. Training for ERT members includes annual reviews of cyanide-related emergency procedures and spill response. The 2023 and 2024 mock drills conducted during the hazmat training included cyanide-specific scenarios.

PRINCIPLE 9 – DIALOGUE AND DISCLOSURE

Engage in public consultation and disclosure.

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

The operation is

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

Basis for the finding:

The operation is in Full Compliance with Standard of Practice 9.1 that requires that the facility provide stakeholders the opportunity to communicate issues of concern.

An Impact and Benefits Agreement (IBA) is in place since 2011 with the Grand Council of the Crees, the Cree Nation Regional Authority and the Cree Nation of Wemindji (the only communities within a 200 km radius). The IBA included the creation of a Collaboration, Employment, Business Opportunities and Environment committees that regularly meet and offer opportunities for mutual interactions with the first nations.

A dialogue mechanism is in place as well as a grievance mechanism; and D-E hosts public meetings and meetings with targeted stakeholders where stakeholders are invited to provide feedback.

D-E also implemented a procedure for environmental event communication to communicate any cyanide-related event to the Chief of Wemindji, the Tallyman and Environment committee members should a discharge to the environment occur.

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

The operation is

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

Basis for the finding:

D-E is in Full Compliance with Standard of Practice 9.2 that requires that the facility initiate dialogue describing cyanide management procedures and responsively address identified concerns. D-E has developed several documents (presentation, brochure, pamphlet, communication) to describe the use of cyanide, mine process and its management. When

public presentations are made, a local translator is present, even if most of the attendees can understand.

Part of an IBA, the Environment Committee members are meeting on a quarterly basis. The meeting presentation covers all cyanide-related events within the quarter (review of the list extracted from D-E incidents list in SAP, both environmental and Health and Safety incidents are reviewed).

The yearly monitoring and surveillance reports are provided to local communities and are available publicly through the Environmental and Social Impact Review Committee (the Review Committee – COMEX).

No reportable cyanide release or exposure happened during the recertification period.

A facility procedure includes reporting requirements regarding the communication of significant events to the International Cyanide Management Institute, and the communication of cyanide events to the public.In addition, D-E reports all cyanide events to its stakeholders in the corporate Sustainable Development (SD) report. However, since no reportable cyanide release or exposure happened during the recertification period, the available reports do not present such information.