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# Agnico Eagle Mines – Canadian Malartic Mine

## INTERNTIONAL CYANIDE MANAGEMENT CODE RE-CERTIFICATION SUMMARY AUDIT REPORT

## Final Report

## June 23rd, 2025

## EEM PROJECT NUMBER: 24EMA010

SUBMITTED TO:

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

and

Canadian Malartic Mine
100, chemin du Lac Mourier
Malartic, Quebec
J0Y 1Z0

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| **Name of Mine:** | Canadian Malartic Mine |
| **Name of Mine Owner:** | Agnico Eagle Mines Ltd. |
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# LOCATION DETAIL AND DESCRIPTION OF OPERATION

## LOCATION

The Canadian Malartic Mine (CMM) is a large open-pit and underground operation located adjacent the south of the town of Malartic, approximately 30km west of Val d'Or in northwestern Quebec (Figure 1). The operation began commercial production in 2011.

In June 2014, AEM and Yamana Gold acquired the mine from Osisko and created the Canadian Malartic Partnership that owned and operated the mine. AEM and Yamana each had an indirect 50% ownership interest in the Partnership. On March 31st, 2023, AEM's acquisition of Yamana Gold's Canadian assets resulted in the Company owning 100% of the Canadian Malartic complex.

Initially, the mine produced from the Canadian Malartic pit. After 10 years of operations, the Canadian Malartic pit was depleted in 2023. Open pit operations continue at the Barnat pit.

In February 2021, the Canadian Malartic Partnership approved the construction of a new underground mining operation at the Odyssey mine. The Odyssey mine is adjacent to the Canadian Malartic mine and hosts three main underground-mineralized zones. Production from the mine was initiated in March 2023. A paste plant was delivered in July 2023 and tailings backfill from CMM began shortly thereafter.

In 2023, two new tailing cells (PR6 and PR7) were constructed to extend the life of the tailing storage facility until the commencement of in-pit deposition of tailings into the depleted Canadian Malartic pit which commenced in June 2024. Also in 2023, CMM raised the height of the dikes of the polishing pond in order to increase capacity.

The facility operates 24 hours/day 7 days/week and employees approximately 2000 full time workers (employees and contractors).

A 135-metre-wide buffer zone (the "green wall") has been developed along the northern limit of the open pits to mitigate the impacts of mining activities on the residents of community of Malartic. The ridge has been planted with shrubs, trees and grasses. The green wall is enhanced by the addition of a nearby park, a bike trail and sculptures.

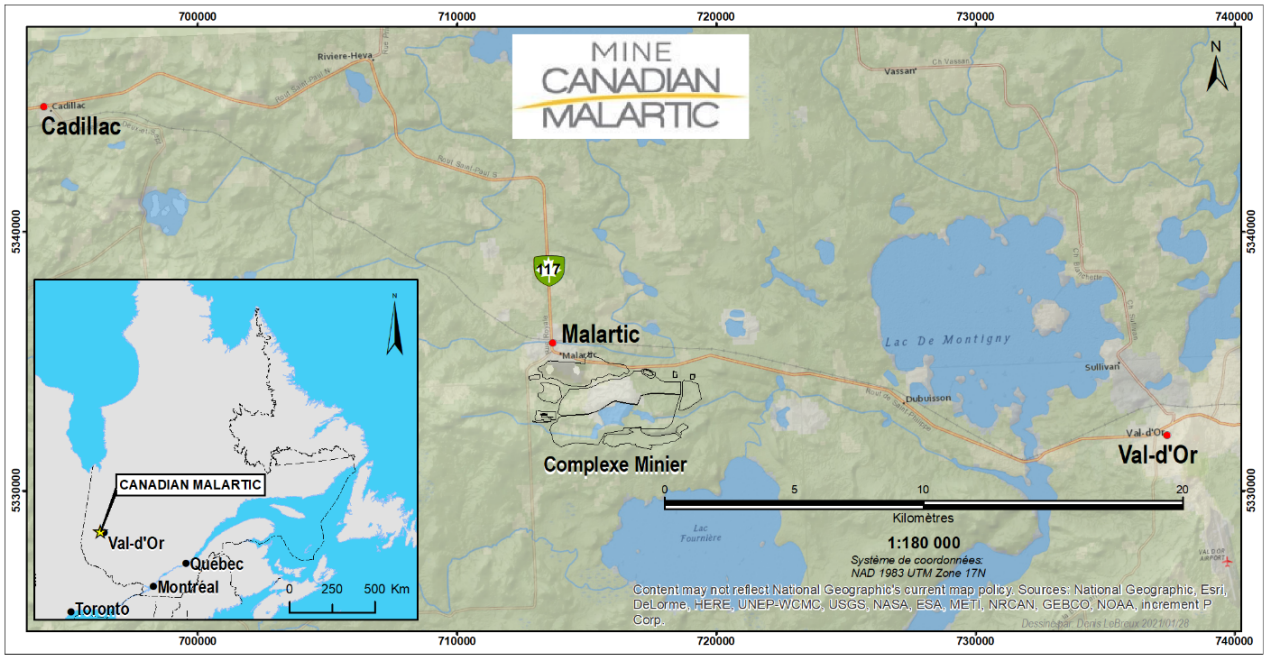


Figure 1: Location of AEM's Canadian Malartic Mine.

## GENERAL OPERATIONS OVERVIEW

Ore is processed at the facility's mineral processing complex, which currently has a 55,000-tonnes/day nominal throughput capacity. Ore is transported to a crushing circuit and the crushed ore is stockpiled in an ore storage dome. The ore is then conveyed to the semi-autogenous grinding circuit followed by three identical ball mills, each in closed circuit with hydro-cyclones. The slurry is thickened to about 50% solids before being fed to the leach tank circuit for conventional cyanidation followed by carbon-in-pulp processing technology. The product is doré bars containing gold and silver.

Cyanide is received in bulk concentrated liquid form (28 to 30% NaCN) via tanker truck from Cyanco's transloading terminal located in Cadillac, Quebec, approximately 35 km from the mine site. The solution is stored in a 96,000L steel tank. The concentrated cyanide solution is directly injected at various locations in the process via a distribution manifold. Cyanide injection points are present at the following locations in the mill:

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- The pre-leach thickener; and
- Positions 1 and 3 of each series of leach tanks (CMM has 4 series of 5 tanks).

Currently, 60% of the cyanide is added to the pre-leach thickener and 40% to the four (4) head tanks of the leach system. No cyanide is currently added to the grinding circuit.

Cyanide flow meters are present at the outlet of each cyanide injection pump. Consumption is calculated in real-time based on wet tonnes fed into the semi-autogenous grinding mill. The cascade control loop for injecting total cyanide into the circuit is initially based on ratios of incoming ore and makeup water. These ratios are typically 0.16kg / metric tonne (mt) of ore and 0.03kg / mt of makeup water.

The control loop ratios are adjustable via a 0-200% correction factor modifiable by the operators. To deal with any sudden variation in ore and to adjust the correction factor, operators perform titrations in leach tank in positions 1, 3 and 5 approximately every 4 to 6 hours. Operators also use two (2) tools to guide them in adjusting the correction factor that take into account the cyanide consumption rate, as well as the variation in residence times depending on milling rates. These are:

- A Mintek online cyanide analyzer to assess the cyanide content at the head of the leach process and to rapidly anticipate variations in cyanide consumption in the circuit; and,

- A control table that assists the operator in evaluating the consumption rate in the leach circuit as a function of the residence time. The table indicates to the operator what circuit head content they should aim for in order to maintain a circuit tail content of approximately 75ppm for optimized metallurgical gains.

A second Mintek is present at the tail of the leach circuit to optimize cyanide consumption and detoxification costs by increasing the frequency of readjustments of the correction factor.

In the elution circuit, the dosage of cyanide in the sterile solution tank is carried out manually approximately every 2 hours in order to maintain a concentration of approximately 1000ppm in solution to promote desorption of silver. A cascade control is in place to optimize reaction kinetics and potentially reduce the dosages required.

Tailings are thickened and detoxified through the Caro's Acid process prior to being pumped to the exhausted Canadian Malartic pit, or to the Odyssey mine paste backfill plant. Excess water is mainly re-used in the plant or treated prior to being discharged to the receiving environment.

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## TAILINGS AND WATER MANAGEMENT

CMM's tailings management area (TMA) and waste rock piles are built on former abandoned tailings, settling, and polishing ponds. The first operations on the site date from around 1930. Some of these infrastructures of the past have been covered by new infrastructures. The TMA consists of ten (10) tailings disposal cells having total superficies of approximately 350 hectares, a sedimentation pond, a polishing pond (South-East Pond), a single final effluent point and an emergency spillway. The design of the TMA is such that water is accumulated entirely outside of the tailings disposal cells, but within the TMA.

Since June 2024, tailings are being directed to the exhausted Canadian Malartic pit. When mining operations in the Canadian Malartic pit ended in May 2023, the pit was 1.8 km long, 1 km wide, and 360 metres deep. The pit was separated by a central berm constructed of waste rock which separates the pit into two. Waste rock and slurry tailings are respectively deposited on either side. The central berm is also used to drain water from the tailings to a dewatering drift. This water is recirculated for use in the process. Once the water is drained from the tailings, a tailings « sand » will be left at the bottom of the pit. Over time, the pit will fill up and once tailings accumulation ends, it will be naturally flooded by the watershed.

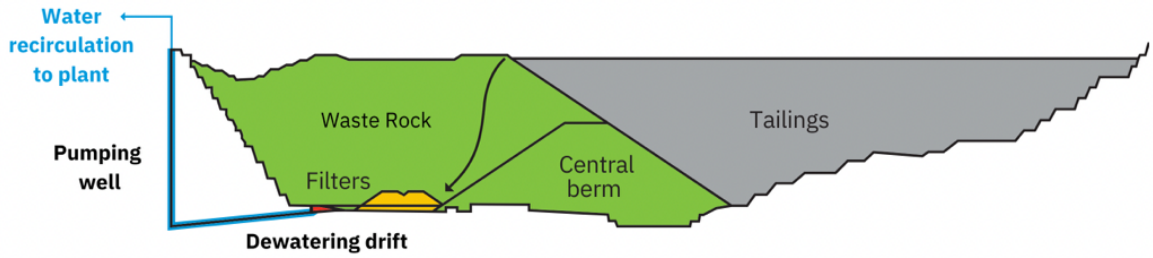


Figure 2 Sectional view of infilling of the Canadian Malartic pit.

Based on current forecasts, the pit will store approximately 168 million tonnes (Mt) of waste rock and 108 Mt of tailings from both the Canadian Malartic mine and the Odyssey mine. Disposal in the Canadian Malartic pit is expected to last until 2042. The facility plans to prioritize deposition of tailings into the pit but maintains the capacity to direct tails to the TMA for contingency purposes.

Following detoxification, the tailings, in the form of pulp at about 63-64% solid, are transported from the concentrator to a booster pump at a flow rate varying from 2300 to

3200m$^3$/hour. After the booster pump, the lines are subdivided for distribution to either the Canadian Malartic pit or the TMA.

Lines to the TMA are further subdivided and branch out to reach the desired deposition points of a cell where tailings are beached at a 1% slope. Pore water and run-off from the tailings disposal cells flow in a southerly direction to the sedimentation pond via a series of collection ditches within the TMA. From the sedimentation pond, the water is either recirculated back to the concentrator, to the polishing pond, or to CMM's water treatment plant if required. This plant treats for metals, suspended solids and, if required, for cyanide using hydrogen peroxide and copper sulphate. Treated water is directed to the polishing pond prior to discharge to the environment. The final mine effluent flows into the Raymond stream, then into the Piché River. This river constitutes the outlet of Lake Fournière.

Tailings contained in the disposal cells gradually dry and compact, and a new layer of tailings is discharged to the cell according to the sequence provided for in the tailings deposition plan. The maximum elevation the tailings facility is projected to reach 60m at end of use. In anticipation of this end of life, a gradual restoration of certain containment structures has already begun.

The TMA's water ponds are managed as a priority to control significant flood events and not as process water reservoirs (with the exception of the sedimentation pond, which has both roles). The principle of water segregation is applied at CMM: waters from outside of the facility's footprint are diverted as much as possible to the exterior without coming into contact with the mine site. Contact water that meets the environmental release criteria is directed to the polishing pond and discharged to the environment through the final effluent, or, as a last resort, used in the concentrator process.

Contact water that does not meet the environmental release criteria is directed to the sedimentation pond. This water is used for ore processing. Under normal weather conditions, the sedimentation pond is slightly positive. It is therefore necessary to periodically discharge water.

Figure 3 illustrates the CMM facilities, including the open pit, tailings management area and milling facilities. To the north of the pit is the town of Malartic. Figure 4 shows the pipeline layout for the transport of tailings to the Canadian Malartic pit, the TMA and the backfill plant.

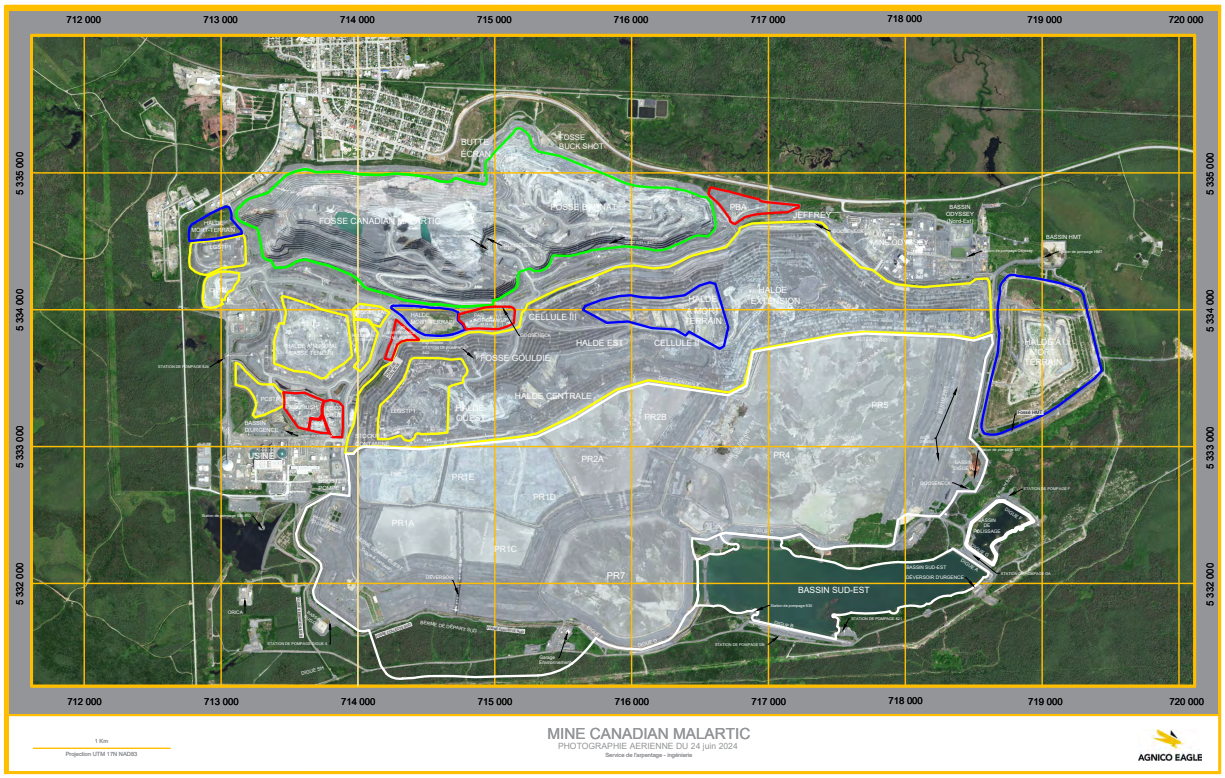


Figure 3: CMM site plan

## FACILITY CHANGES SINCE THE INITIAL CERTIFICATION AUDIT

The following material change occurred with regards to cyanide operations since the facility's initial certification audit conducted during the fall of 2020:

- The Odyssey underground mine came into operation in March of 2023. The mine is a separate entity from the Canadian Malartic Mine. However, tailings from CMM have been used as backfill in the new mine since summer 2023. A backfill plant was constructed near the Odyssey underground mine shaft. The plant is under the responsibility of CMM.
- Tailings and waste rock are being directed to the Canadian Malartic pit since June 2024. Restauration of the facility's tailings began during the fall of 2024.
- Two (2) underground single-walled tailings pipes between the mill and the tailings pump station have been removed from service, rinsed, and capped.

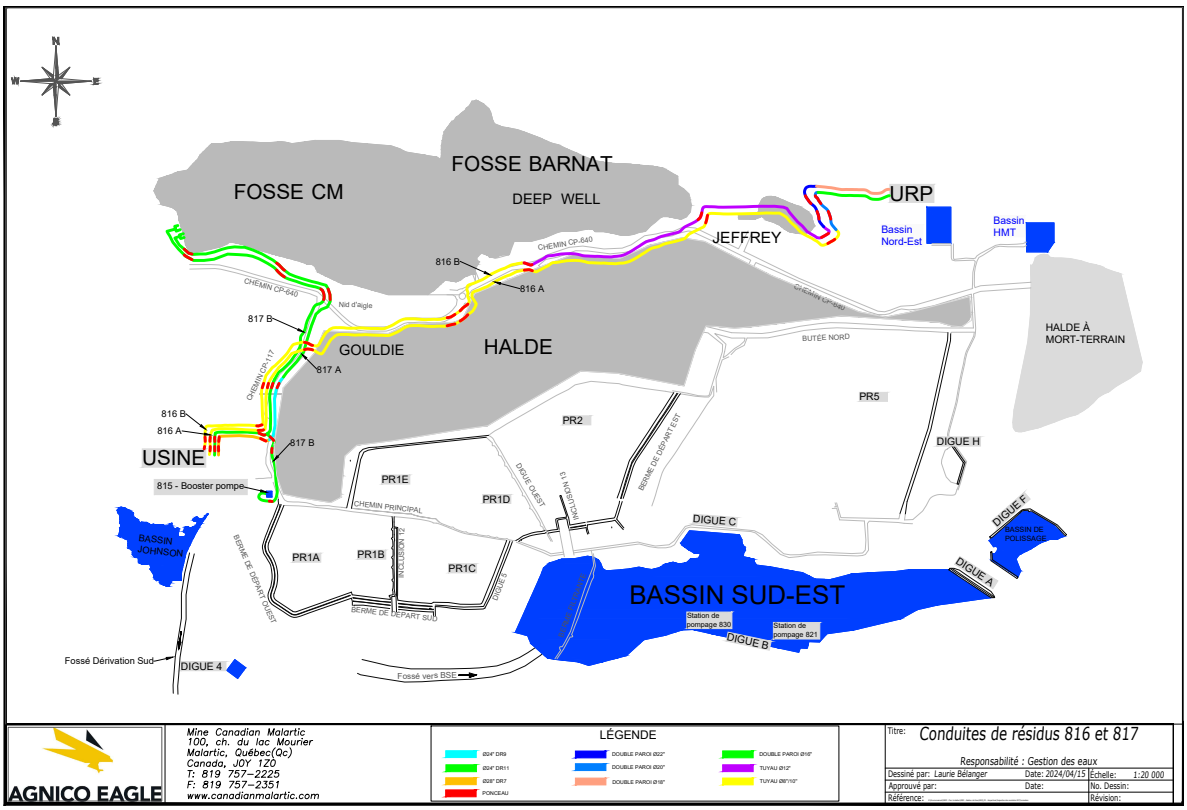


Figure 4: Tailings pipeline lay-out

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# AUDITOR FINDINGS

## AUDITOR FINDINGS

This operation is

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

with the International Cyanide Management Code.

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

## AUDITOR INFORMATION

**Audit Company:** EEM EHS Management
505, boul. René-Lévesque West
Suite 1106
Montréal (Québec) Canada
H2Z 1Y7

**Audit team leader and technical auditor:** Ross Szwec

**E-mail:** ross@eem.ca

**Date(s) of Audit:** August 19th to 23rd, 2024

## AUDITOR ATTESTATION

I attest that I meet the criteria for knowledge, experience, and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, established by the International Cyanide Management Institute and that and that the auditor meets 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 re-certification audit. I further attest that the re-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.

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## PRINCIPLE 1 – PRODUCTION AND PURCHASE

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

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|---|---|
| *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
☐ not in compliance with

**with Standard of Practice 1.1**

Basis for the finding:

- CMM exclusively purchases its sodium cyanide from Cyanco under a Supply contract which specifies that Cyanco (Seller) shall maintain its International Cyanide Management Institute (ICMI) cyanide code certification and remain a signatory to the Code for the duration of the contract.
- Cyanco's production facilities in Winnemucca, Nevada, was recertified as fully compliant on January 13, 2023, while its production facilities in Huston, Texas was recertified as fully compliant on April 28, 2023.

## 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:

- Cyanide is supplied by Cyanco. Supply chain and transporters used are all ICMI certified. Cyanco's North American rail and truck supply chain was re-certified in July 2022. Cyanco's Cadillac, Quebec transloading terminal facility was recertified on July 1, 2024.
- Transport from the Cadillac transloading terminal to CMM is conducted by road by Transport Nord-Ouest Inc. which is included in Cyanco's North American Rail & Truck Supply Chain certification. Delivered bulk solution arrives at a concentration of 28 to 30% NaCN.
- CMM's contract with Cyanco includes a requirement that Cyanco comply to the ICMI code requirements, including use of ICMI certified distributors and contract transporters, and maintain its certification to the code for the duration of the contract.

## 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:

- The facility receives concentrated cyanide solution and, as such, does not conduct mixing. Sodium cyanide solution is received at between 28 and 30% and stored in a closed and ventilated 96,000L steel tank which is located outside of the mill on a concrete surface with concrete secondary containment walls. The concentrated cyanide solution is directly injected at various locations in the process via a distribution manifold.
- The cyanide storage tank is located within the mill facility boundaries, with security restricting access to the site. The site is further bounded by a security fence. Security cameras are in place to observe the facility, including the cyanide storage area 24/7.
- No incompatible substances are stored near the cyanide storage tank, no foods or animal feeds are present nearby, and smoking is prohibited in the area via signage.
- The facility maintains a current database of drawings related to the design and construction of the cyanide unloading and storage facilities.
- Professional engineers conducted an audit in 2019 and 2020, prior to the facility's initial Cyanide Code certification, to confirm that the tank was constructed in accordance with sound engineering practices and International Cyanide Management Code (ICMC)

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requirements. The audit report concluded that the installations associated with cyanide were built in accordance with sound engineering practices. No changes have been made to the unloading and storage facilities since the facility's initial Cyanide Code certification audit in 2020.

- Unloading and storage facilities are located away from general traffic at the facility and areas where workers may congregate. Barricades are set up when unloading is taking place to restrict access to the general area. A fixed HCN detector and audible and visual alarms are present at the unloading / storage tank area. The unloading and storage facilities are located away from any surface waters (>600m) and the community of Malartic (>1km).
- Two (2) portable buildings; a small gym and offices, are located approximately 30m and 40m respectively due south from the cyanide unloading area and storage tank. Provisions are in place in the facility's emergency response plan to evacuate the gym and office buildings should a situation occur during cyanide unloading.
- Cyanide unloading is conducted on a concrete surface that slopes to a sump that redirects to the cyanide manifold sump in the mill. Process water is available at the unloading area to wash any residues. An unloading procedure is in place to ensure safe unloading, recover/clean residues of cyanide solution, and ensure that pipe connections are cleaned after unloading.
- The facility's cyanide unloading procedure requires that the mill operator verifies the capacity of the tank before beginning unloading operations. The cyanide storage tank is equipped with ultrasonic level indicators and high and high-high level alarms. There is also a redundant vibrating level detector which sounds an alarm and stops pumps should the tank reach 96.4% capacity. In addition, the cyanide supplier (Cyanco) has access to real-time readings of the storage tank level via telemetry. The level detectors are on a preventative maintenance program. Mill personnel also track reagent consumption weekly and monitor for discrepancies.

| | |
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| *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:

- There are no empty cyanide containers on the site. Cyanide is delivered in bulk as a concentrated dyed liquid. Cyanco personnel conduct the unloading operations under the supervision of CMM personnel.

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- Dry disconnect type couplings are used during the cyanide bulk off-loading. This type of coupling eliminates spillage of any residual liquid contained within the line after disconnection. In addition, the system is purged of residual cyanide prior to disconnection. Remaining cyanide residues, if any, are rinsed with process water followed by rinsing with sodium hypochlorite solution.
- Procedures are in place to prevent exposures and releases during cyanide unloading including:
    - Required PPE;
    - Observation of unloading operations from a safe area of Cyanco delivery truck driver by a CMM mill operator;
    - Operation of valves and couplings;
    - Purging and cleaning of couplings, hoses and pipelines upon completion of unloading; and,
    - Spill prevention and clean-up.
- Preventative maintenance programs are in place for all cyanide valves, couplings, hoses, pipelines and injection points. In addition, spare parts are maintained on-site for both the unloading area equipment and the Cyanco delivery truck.
- The facility conducts a monthly audit of mill reagent operations and activities. Cyanide handling, including unloading, is audited at least twice per year.

## PRINCIPLE 4 – OPERATIONS

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

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|---|---|
| *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:

- There are no mixing facilities or heap leach operations at this facility.
- The site has developed and implemented a large number of procedures for the management of cyanide facilities. There are no mixing facilities or heap leach operations at this facility.

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- Facility operating plans and procedures and cyanide facilities take into account regulatory and cyanide code requirements. The tailings impoundments and pond designs and their operation take into consideration design storm events and freeboard. The concentration of cyanide discharged to and allowed in surface water is regulated through provincial and federal requirements.
- The site has established plans and programs for inspections and preventative maintenance to ensure safe and environmentally sound operation of the facility including specific measures for compliance with regulatory requirements and the Code. This includes regularly scheduled and documented inspections of key components of cyanide equipment and tailings and water management system. Daily visual inspections are conducted by mill operators. These inspections cover piping, tanks, and secondary containment structures.
- A management of change procedure is in place to address changes to production processes, operating practices, or equipment involving cyanide. Proposed changes must be reviewed and signed-off by environment and health and safety personnel, mill operations, engineering and maintenance personnel, and must be reviewed by the person responsible for the cyanide code at the facility before changes are implemented.
- Tailings management plans outline actions required when issues are identified through inspections or monitoring activities, as well as when water balance upsets occur. Emergency preparedness and response plans are in place for the tailings area and are tested and mill operations and effluent treatment plant procedures outline inspection and monitoring processes and actions to be taken in the event of deviation.
- The facility's closure plan outlines measures to be taken in the event of temporary closure / cessation of activities and includes an on-site presence to ensure that inspection and maintenance activities, and effluent treatment is ongoing as required. A care and maintenance plan is in place and was implemented during the Covid-19 pandemic.
- Inspection of cyanide containing tanks is based on API Standard 653 - *Tank Inspection, Repair, Alteration, and Reconstruction*. The inspection program includes non-destructive testing at 5-year intervals. Secondary containment structures are inspected at 48-month intervals by an external engineering firm. Inspected secondary containment structures, which are all concrete, include those of: the cyanide solution storage tank, the cyanide distribution pumping manifold, the leach tanks, and the carbon in pulp tanks. In addition, all secondary containment is visually inspected at every shift and the cyanide unloading procedure includes a pre-unloading inspection to ensure that the secondary containment and associated sump are ready in the event of a spill.
- Non-destructive testing is conducted annually on cyanide containing pipelines. Lines containing pulp in the mill undergo weekly thermal verification to detect weak spots. All piping is inspected visually at each shift. A monthly inspection is conducted on the cyanide distribution area (containment, pump, distribution manifold). Flanges and valves on cyanide lines are inspected every 6 months.
- Pressure loss indicators are in place for underground pipelines between the pre-leach thickener and the leach tanks, and between the final discharge pumps (640) and the booster pumps (815) which go to the tailings management area. In addition, monitoring wells are in place to monitor the underground pipelines that run between the pre-leach thickener and the leach tanks. Tailings lines are inspected quarterly at the most susceptible breakage locations using a thermal imaging camera.

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- Since the June 2024, tailings are disposed of in the exhausted Canadian Malartic pit. Water from the pit is either recirculated to the mill or sent to the south-east pond. Concentrations in the pond are consistently <0.5ppm total CN.
- An instrumentation, control and monitoring plan was developed to guide waste rock and tailings deposition in the former Canadian Malartic pit. The plan details the monitoring (via both instrumentation and visual inspection) and frequencies required to ensure that deposited materials perform according to the conceptual plan. The plan also includes trigger action response plans (TARPS). The facility has also implemented an operating manual and monitoring program for backfilling the Canadian Malartic pit with waste rocks. This manual aims to ensure compliance with the planned stages of the pit backfilling operation and to communicate the operating parameters to involved personnel.
- The site has established and implemented a tailings Operation, Maintenance and Surveillance (OMS) Manual for the tailings management facility that includes freeboard requirements. The manual also covers the south-east pond, emergency collection ponds, fire water and other water collection ponds, water collected in pits, and water derivation systems. The plan outlines inspection requirements and processes and records are completed for these inspections.
- The facility has a diversion ditch to the south-east of the property that diverts non-contact water from a small sub-watershed to the environment. The diversion ditch inspection is included in the regular site and tailings inspections.
- Inspections are recorded as are records of corrective actions.
- Based on the information reviewed, the inspection program for cyanide facilities is deemed adequate by the auditor.
- A preventive maintenance program has been developed and implemented for cyanide equipment including calibration of measuring equipment, inspection of pumps, tanks, pipes, flanges, valves, level probes, etc. Spare parts associated with critical equipment are readily available on-site or locally. The inventory of parts is based on a criticality analysis and inspection results.
- Emergency back-up generators are in place to ensure that the concentrator is secure, the tailings water recirculation continues, and that water treatment continues. Cyanide addition is stopped automatically when power shuts down. The generators are on a monthly preventative maintenance schedule. Annually, the generators are inspected externally by the manufacturer. Inspection includes testing under load.

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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**
☐ in substantial compliance

**with Standard of Practice 4.2**

| | | |
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☐ not in compliance with

Basis for the finding:

- Cyanide addition rates are determined by mill metallurgists based on test work and ore requirements. Metallurgists continually monitor mill rejects to determine if the cyanide consumption rate is optimal.
- Cyanide addition rates, concentrations, and pH targets in different areas of the process are communicated to mill operators via daily production instruction sheets.
- Free cyanide concentration in the process is automatically analyzed using online cyanide analyzers. Titration tests are conducted by mill operators at 4-hour intervals to validate results.
- Very little change in cyanide consumption has been observed between ore sourced in different areas of the mine including ore from the new Odyssey underground mine.

*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 **with Standard of Practice 4.3**
☐ not in compliance with

Basis for the finding:

- The facility does not operate heap leach facilities.
- The facility has developed a comprehensive, probabilistic water balance model that takes into consideration climate change impacts in addition to code requirements.
- The facility's environmental operating permit includes the requirement to have a probabilistic water balance model and that climate change be taken into consideration. The water balance is updated annually by the facility based on actual data collected while an external specialist conducts an annual predictive water balance for life of mine.
- Design operating ranges, including minimum freeboard for the tailings ponds, are indicated in the tailings design basis memorandum and the tailings Operation, Maintenance and Surveillance (OMS) Manual for each containment structure and are integrated into the water balance model. The tailings OMS manual includes inspection and monitoring activities to prevent overtopping of ponds and impoundments and unplanned discharges. In addition, the water balance incorporates a trend analysis to define an optimal range of water levels to eliminate the risk of over-topping. Real-time monitoring via the mill's plant information system is in place and includes alarm set-points and automated pumping systems. Emergency power generators are connected to critical tailings area pumping systems.

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- Actual precipitation data is sourced from an Environment and Climate Change Canada weather station located in Rivière Héva, approximately 14km north of the mine site. Precipitation data is used in the water balance and the results compared with the design assumptions. During winter, snowpack measurements are taken to predict water quantities during spring thaw.

*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:

- Tailings leaving the mill typically contain weak acid *dissociable* (WAD) cyanide concentrations in the 2 to 15 mg/L range and WAD cyanide is monitored in the various ponds to confirm that the concentrations are less than 50 mg/L. Wildlife deterrent systems (5) are installed on the southern perimeter of the site (i.e., tailings area side) in addition to fencing where fall risks are present.
- CMM has two analyzers installed on the detoxification unit to ensure that WAD cyanide does not exceed 50 mg/L. Alarm levels for the cyanide detoxification are set to 18 mg/L (high) and 20 mg/L (high-high) WAD cyanide. The facility also monitors WAD cyanide in the various ponds to confirm that the concentrations are less than 50 mg/L.
- Cyanide is destroyed in the tailings pulp using the Caro's Acid process prior to discharge to the tailings area, to the exhausted Canadian Malartic pit, or being used as underground backfill.
- The facility performs toxicity tests on the facility's single final effluent as per federal requirements. The data demonstrates that the final effluent has never been toxic to fish or water fleas (Daphnia magna).
- Facility and tailings area inspections include wildlife observations. No wildlife mortalities related to cyanide exposure have been observed since the initial cyanide code certification audit conducted in 2020 although some drowning incidents have been recorded.
- There are no leach facilities at this 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**

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

Basis for the finding:

- CMM's only direct discharge to surface water is its final effluent. No exceedance of the provincial instantaneous total cyanide limit of 2 mg/L have occurred and the maximum WAD cyanide concentration since 2020 (up to June 11th, 2024) was 0.1mg/L. Pre-alarm levels have been established at >1ppm Total CN, >0.5ppm WAD CN, and 0.022ppm Free CN in the final effluent.
- A mixing zone has been established under federal requirements and is located approximately 5.5km downstream from the facility's final effluent discharge point. The water is monitored four (4) times per year as per the federal requirements. A review of the receiving water data shows that the maximum concentration of total cyanide measured during the period of January 2021 to June 2024 was 0.017 mg/L. Note that free cyanide is always lower than total cyanide.
- Seepage from the tailings management area is collected in ditches surrounding the facility and pumped back into the south-east pond.
- The facility monitors groundwater downstream of the tailings ponds twice per year (spring and fall). Sampling of groundwater wells around the tailings management area confirm that total cyanide in groundwater does not exceed 0.022 mg/L and hence does not result in free cyanide in excess of 0.022 mg/L released to surface water. An external consultant reviews the data and compiles annual reports that are submitted to regulatory authorities.
- There have been no indirect discharges from the operation that have caused cyanide concentrations in surface water to rise above levels protective of a designated beneficial use for aquatic life. CMM monitors WAD cyanide in privately owned drinking water wells downstream from the mine site in order to confirm that there is not impact from cyanide use. Results are below or near detection limits.

<u>Standard of Practice 4.6</u> *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 facility's tailings management area foundations consist principally of clay or till.

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- Sampling of groundwater wells around the tailings management area is conducted twice per year (spring and fall) and confirms that total cyanide in groundwater does not exceed 0.022 mg/L and hence does not result in free cyanide in excess of 0.022 mg/L released to surface water. An external consultant reviews the data and compiles annual reports that are submitted to regulatory authorities. The results of the groundwater monitoring show no anticipated impact to any receptors.
- CMM monitors WAD cyanide in privately owned drinking water wells downstream from the mine site in order to confirm that there is not impact from cyanide use. Results are below or near detection limits. The provincial limit for cyanide is drinking water is 0.2 mg/L as defined by the Regulation respecting the quality of drinking water, Q-2, r. 40.
- Groundwater south of the tailings pond and in the PR7 cell area flows toward the south-east basin, south, or towards Raymond Creek. Groundwater reaching the eastern sector flows northeast into the Malartic River regional watershed basin.
- The Odyssey underground mine began production in March 2023 and the use of tailings as backfill commenced during summer 2023. Tailings are detoxified to <20 ppm CNt prior being dehydrated and then mixed with additives (cement/slag/fresh water) to obtain the backfill paste. Regulations are in place in Quebec for the presence of cyanide in tailings that are used for underground backfill. The Regulation respecting occupational health and safety in mines (s-2.1, r. 14), section 84, states that when ore tailings are used for backfilling underground excavations, the water contained in these tailings and flowing from them must not have a cyanide content higher than 0.005% (50 mg/L) expressed as potassium cyanide.
- Mine waters are sampled 2X per month at three locations. Results over the period from February 2023 to May 2024, show a maximum CNt concentration of 0.24 mg/L and an average of 0.057mg/L. The provincial jurisdictional limit is 1 mg/L CNt as a monthly average. Alarm triggers are in place: 2ppm CNt. Sampling of runoff conducted on August 6th, 2024, near a stope that was backfilled in June 2024 indicated 0.26 and 0.22 mg/L WAD CN.

*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:

- No cyanide mixing taking place at this facility. The facility receives and uses concentrated cyanide solution (30% NaCN).
- Cyanide unloading is conducted on a concrete surface that slopes to a sump that redirects to the cyanide distribution manifold sump in the mill.

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- The concentrated cyanide solution storage tank, lixiviation tanks, and carbon in pulp tanks all have concrete secondary containment. The concrete secondary containment for the lixiviation tanks is insufficient to hold the volume of a complete tank and the thickeners (2) do not have secondary containment. However, a catastrophic release from these would be directed, via natural topography, to an emergency containment area that can contain in excess of 110% of the volume represented by the largest tank (i.e., a 30,000$m^3$ thickener).
- The emergency containment area is equipped with a permanent pump station in order to empty accumulated waters. Maintenance of the basin is part of the facility's environmental permitting requirements. The facility's emergency response plan considers release scenarios to the basin. And exercises involving releases to the basin have been conducted.
- A procedure is implemented for cleaning exterior secondary containment structures and the facility's procedure for cyanide spills outlines requirements for spill clean-up, including recovery of solutions. Outside spills to soil or other would initiate implication of external specialists. The external specialist would be responsible for analyses to be performed including what final cyanide concentration will be allowed in residual soil as evidence that the release has been completely cleaned up (in line with jurisdictional and ICMI requirements). Additionally, the external specialist would be responsible for the appropriate disposal of soils and other media contaminated with cyanide including the provision of proof of disposal / destruction. The facility also has in place a procedure that outlines monitoring requirements in the event of a spill.
- All pipelines containing CN are confined to site and present no risk to surface waters. Special prevention and containment measures are provided for: Two portions of pipeline that are buried between the leach and thickener tanks (approx. 75ppm WAD CN), pipelines that transport tailings pulp (<20 ppm CNt) to the Odyssey mine backfill paste plant, and tailings line used to infill the Canadian Malartic pit.
- The buried process pipes between leach and thickener tanks are routinely tested (thickness and continuity), continually monitored with alarmed pressure loss detection, and monitored via monitoring wells equipped with alarmed continuity probes. A catastrophic release from these pipes would be directed, via natural topography, to an emergency containment area located to the north.
- The pipelines that transport tailings pulp to the Odyssey mine backfill paste plant are double walled in certain areas to avoid spillage into the Jeffery pit (in order to keep mine waters in this pit clean), undergo routine thermal imagery tests, and are equipped with alarmed pressure loss detection. Spillage from the pipeline would flow, via natural topography to a ditch that runs along the norther perimeter of the mine site and drains to the northeast basin that is used to collect drainage water from the Odyssey mine and runoff from the northeast portion of the site.
- The tailings lines used to infill the Canadian Malartic pit are double-walled or contained in culverts.
- Cyanide tanks and pipelines are constructed with carbon steel. Certain sections of concentrated cyanide solution distribution pipelines at the entrance of the lixiviation tanks that were prone to erosion have been converted to stainless steel. Tailings lines are all constructed of high-density polyethylene plastic.

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- Since the initial certification audit in 2020, a former single-walled tailings pipe between the mill and the tailings pump station has been removed from service, rinsed, and capped.

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| *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:

- Quality control and quality assurance were in place at the time of facility construction. However, as the facility was not a signatory to the code at the time of construction, a review of cyanide facilities was subsequently conducted in 2020 by professional engineers who are members of the Quebec Order of Engineers to confirm that code requirements were met. The report concluded that the installation of cyanide structures was in accordance with original designs, including pipeline and tanks. Where modifications were made, installations were compatible with cyanide use. The report recommended further investigation to confirm that the joints between the mill foundation and walls to ensure containment. A corrective action plan was prepared and implemented during the facility's initial certification audit.
- All documentation relating to the design and construction, including the quality control / quality assurance for all cyanide facilities including the tailings area is maintained including for all substantial modifications since the initial certification, including a new paste backfill plant for the Odessey underground mine.
- Engineering and construction oversight of cyanide facilities is undertaken by third parties. These include assurance programs related to the suitability of materials and adequacy of earthworks. Periodic dam safety reviews are undertaken of the facility's tailings management infrastructure and system and annual geotechnical inspections are conducted.

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| *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

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Basis for the finding:

- A procedure for surface water monitoring is in place and is undertaken by CMM environmental personnel. The surface water sampling procedure was initially developed in house by qualified environmental professionals. The procedure has undergone some minor changes / clarifications since the facility's initial certification in 2020. Changes were reviewed by the Superintendent of environment, monitoring and control who holds a bachelor's degree in applied science.
- Groundwater sampling is conducted by external consultants for on-site monitoring wells and in downstream residential wells. The methodologies for groundwater sampling are available. Groundwater sampling procedures have been developed by external hydrogeologist consultants or follow provincial methodology.
- Sampling frequencies are based on regulatory, permit, and internal monitoring requirements and are outlined in sampling calendars. These are maintained current based on regulatory and internal monitoring requirement changes. Internal monitoring is designed to alert to potential issues. Actions are initiated at 50% of established limits.
- The presence of fauna is verified during water sampling campaigns and observations of fauna made by workers are reported on an ongoing basis to the environment department and are recorded in a Microsoft Excel register.
- Surface and groundwater monitoring procedures indicate sampling locations and frequencies, parameters to be analyzed (including cyanide species), sampling containers and preservatives required, and indicate chain of custody and shipping instructions.
- Quality control measures are included at the sampling level (i.e., field blank and duplicates) and during analysis at the laboratory (blanks, control samples, and spikes).
- Sample analysis is completed by ISO 17025 certified ministry of environment accredited laboratories.
- Surface water sampling conditions are recorded. For example, water colour, presence of algae or sediment, and other conditions that could potentially influence results. The presence of fauna is also verified during water sampling campaigns.
- Weather conditions (precipitation, wind, humidity, temperature) are maintained in a database that collects data from CMM's weather station located in the city of Malartic.
- The frequencies are considered adequate to characterize the medium being monitored and to identify changes in a timely fashion.

## PRINCIPLE 5 – DECOMMISSIONING

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

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| *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 **with Standard of Practice 5.1**
☐ not in compliance with

Basis for the finding:

- The procedure and estimation of cyanide decommissioning costs are detailed in a technical memorandum done by a 3rd party in 2020. The memorandum, which contains the cyanide decommissioning procedure as an appendix, was prepared as a supplement to the facility's closure plan. An addendum was issued to the memorandum in 2021 for new tailings cells.
- In addition, the 2021 revision of the facility's closure plan takes into consideration the facility's paste backfill plant, which was put into operation in July 2023, as well as a future second backfill plant (or expansion of the initial plant).
- An implementation schedule is presented in the technical memorandum on the dismantling of cyanide facilities. Considering that the closure date varies over time depending on new opportunities or discoveries, the schedule details time periods and not fixed dates.
- Provincial regulatory requirements in the jurisdiction require that mine closure plans be reviewed on a minimum 5-year frequency. The technical memorandum aligns with this legal requirement and requires a review of the decommissioning plan as well as its implementation costing every five years.

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| *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 **with Standard of Practice 5.2**
☐ not in compliance with

Basis for the finding:

- The estimation of cyanide decommissioning costs is detailed in a technical memorandum done by a 3rd party in 2020. The memorandum was prepared as a supplement to the facility's closure plan. An addendum was issued to the memorandum in 2021 for new tailings cells. Costs are based on third party implementation of decommissioning measures. This is a requirement in the jurisdiction.

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- Regulatory requirements in the jurisdiction require that mine closure costs be reviewed at a minimum 5-year frequency. The technical memorandum requires costing review that aligns with this requirement. Internal Agnico Eagle Mines closure costing reviews are also conducted as part of annual life of asset planning.
- Pursuant to Quebec's provincial Mining Act, CMM is required to provide and maintain a security guarantee that covers the total cost of closure, including costs for cyanide-related decommissioning activities. The closure plan, guarantee, and letter of credit were approved by government authorities in May 2022.

## PRINCIPLE 6 – WORKER SAFETY

***Protect workers' health and safety from exposure to cyanide.***

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| *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:

- There is no cyanide mixing at this facility.
- CMM has developed and implemented a number of procedures to ensure that cyanide-related tasks are performed in a safe manner. A review of the list of controlled documents was conducted and a significant number of procedures concern the safe use of cyanide. Procedures include the need for personal protective equipment and describe the requirements within them. The facility has in place a confined space entry procedure and has implemented an internal permit process where a high-risk work permit is required for all work on equipment that could contain cyanide. The permit requires decontamination to the commencement of any works on cyanide containing equipment.
- A double sink, supplied with process water, has been installed in the reagent sector of the mill to clean tools that have been used for work on cyanide containing equipment. Labels are affixed to items that have been cleaned.
- Procedures are elaborated and reviewed with the participation of workers who would be potentially involved and are reviewed by health and safety and, where required, environment department personnel as well as others. For example, metallurgists, maintenance personnel, etc. The work card process requires worker input and is reviewed with supervisors at least once per shift. Worker input is considered for high-risk work permits and during Job Safety Analyses which are conducted for non-routine tasks, when

there is much co-activity involved, or for large-scale works. Worker input is also considered via regulatory established mechanisms such as the facility's joint occupational health and safety committee and worker elected health and safety representatives.

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| 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:

- Metallurgists establish weekly operating instructions for the process to ensure that evolution of HCN gas is limited during production. Setpoints are typically in the range of 10.5 to 11 and are based on laboratory testing to achieve optimum recovery. pH is continuously monitored throughout the process. Operators verify pH manually 4X per day (2X per shift). A difference of 0.3 requires recalibration of process pH probes. There is no mixing at this facility.
- A mapping of potential cyanide exposure areas has been established. Fixed HCN detectors are in place in areas of risk identified in the mapping and portable detectors are used when conducting work involving cyanide. Alarm levels have been established: 4.7ppm (pre-alarm, verification), and 10ppm (evacuation). A cyanide spill procedure addresses corrective actions to be taken. Use of appropriate PPE in areas of risk are addressed by various means including mill reagent training, cyanide specific training (annually refreshed), procedures, and through signage at the mill.
- Fixed HCN detectors are calibrated and maintained at a regular frequency (every 3 months). The manufacturer does not specify a frequency other than calibrate at regular intervals. Portable detectors are calibrated in line with the manufacturer's recommended frequency (i.e., <30 days). Calibration records are retained indefinitely.
- All concentrated CN lines are painted purple, and direction of flow is indicated. Tanks containing cyanide are identified with signage.
- Signs are present at all mill access doors, at the backfill plant, and at the tailings pumping station, and at the paste backfill plant. Tailings leaving the mill are typically in the 2 to 15 mg/L WAD cyanide range. Signage indicates the presence of cyanide, the need for the use of personal protective equipment, as well as no smoking and open flames, and prohibition of eating or drinking. All persons (i.e., employees, contractors (including security and janitorial personnel), and visitors) who will be autonomous at the site receive orientation training that includes hazards related to the presence of cyanide and its use.

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- Water fountains are present at some locations in mill with signs prohibiting the use of personal water bottles. The water fountains are inside of positively ventilated cabinets equipped with positive ventilation. Ventilation filters are changed monthly.
- The cyanide supplier is under contract to add colorant dye, either red or pink, to the product prior to delivery to CMM mine site. All concentrated CN lines are painted purple, and direction of flow is indicated. Tanks containing cyanide are identified with signage.
- Emergency showers and low-pressure eyewash stations are in place. Positioning is based on a mapping of potential cyanide exposure areas and on NSI/ISEA Z358.1 *Emergency Eyewash and Shower Equipment*. Portable ocular rinse stations are also available in all mill sectors. Weekly, showers and low-pressure eyewash stations are flushed, and water temperature is verified. The water network is verified monthly (flow, temperature and partial flushing). Dry powder portable fire extinguishers are in place throughout the facility and are inspected in accordance with *NFPA 10 – Standard for portable fire extinguishers* requirements.
- Safety Data Sheets (SDSs) are available at computer stations throughout the facility. Hardcopies of SDS are available at the cyanide storage tank and at the infirmary. SDS are available in French (the local working language). All procedures, including First aid procedures, are developed and implemented in French.
- All incidents, accidents and near miss events are reported using a software application. Systematic investigations are conducted for all events involving or potentially involving cyanide. The incident management program presents the investigation approach and identifies the persons responsible for actions relating to reporting and investigation. Corrective actions aim to avoid reoccurrence.

*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
☐ not in compliance with

**with Standard of Practice 6.3**

Basis for the finding:

- Medical oxygen and resuscitators are available at the infirmary and in the mine's ambulance. At least two antidote kits are available at the infirmary. Automatic defibrillators are also available. Various emergency notification mechanisms are available at the cyanide unloading and storage areas as well as throughout the facility. These include alarm switches (relayed to the guardhouse) and radios.
- First aid equipment is inspected, and records of inspections are maintained. A procedure has been implemented outlining how medical equipment is inspected, including first aid kits, and includes a checklist to confirm that the equipment is ready for use. Cyanide

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antidotes are stored at the infirmary as per manufacturers recommendations and have expiry dates listed.

- Site Emergency Response Plans have been developed and implemented and include a section regarding procedures for responding cyanide exposures (HCN gas or liquid CN). The referenced procedures detail response to cyanide exposure through ingestion, inhalation and absorption through the skin and eyes.
- A cyanide specific intervention protocol has been developed for use by nurses and authorizes them to administer cyanide antidote intravenously. The protocol is reviewed and signed-off annually by a medical doctor.
- The site has an infirmary that is staffed 50 hours per week (Monday to Friday). The facility has a team of first responders that are available 24/7. All are annually trained on cyanide exposure response.
- The site has an on-site ambulance but does not provide transport to off-site medical facilities. The operation is in the community of Malartic and has local ambulance service available to transport exposure victims to the nearest hospital located in Val d'Or, approximately 35km from the mine site. Victims must be completely decontaminated prior to removal from site. In the event of a cyanide exposure in the absence of on-site nurse, first responders provide a cyanide antidote kit to the ambulance paramedic who can administer the antidote.
- An annual e-mail is sent to the directorate responsible for coordinating regional emergency measures for hospitals. The directorate responded that local hospitals have the capacity to respond and maintain cyanide antidote kits. The facility is confident that the Val d'Or hospital can respond to cases of cyanide exposure as the region's principle industry is mining with several gold mines using cyanide.

## 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
☐ not in compliance with

**with Standard of Practice 7.1**

Basis for the finding:

- Site Emergency Response Plans have been developed and implemented and include a section regarding procedures for responding cyanide exposures (HCN gas or liquid CN). A

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cyanide specific intervention protocol has been developed for use by nurses and authorizes them to administer cyanide antidote intravenously. The protocol is reviewed and signed-off annually by a medical doctor. In addition, a procedure has been developed and implemented specifically to respond to cyanide spills.

- A risk assessment has been completed and maintained, specifically focusing on cyanide risks, and the facility's Emergency Response Plans outline the measures taken to prepare for and respond to potential HCN and liquid cyanide scenarios. These include: tank, pipeline, and valve ruptures/failures, transportation events, incidents during unloading, cyanide releases during a fire or explosion, tailings and pond incidents, power outages and pump failures, and malfunction of the cyanide detoxification plant.
- The site's emergency response plan includes a section on major incidents that trigger alarms and evacuations of facility personnel. The nearest potentially affected communities of interest are a small industrial area located approximately 1.6km north-northwest of the mill.
- The facility's procedure for cyanide spills specifically deals with cyanide spills and releases and their control and containment, assessment, mitigation, and clean up.
- All incidents, accidents and near miss events are reported using a software application. Systematic investigations are conducted for all events involving or potentially involving cyanide. Corrective actions aim to avoid reoccurrence.

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

**The operation is**

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

**with Standard of Practice 7.2**

Basis for the finding:

- CMM involves its workforce and external stakeholders in the cyanide emergency response planning process through involvement in emergency practices and exercises (CN spill exercises, rescue at heights, and confined space rescue), and exercise and response event post-mortems. Workers are also consulted during the development of response scenarios and procedures. The Emergency Response Plan is communicated annually to the town of Malartic and the local fire department. The latter also conduct an annual site visit and participate in periodic on-site training sessions. The site has also contracted an external service provider to respond to spills, including cyanide related spills and rehabilitation.
- A risk assessment has been completed and maintained, specifically focusing on cyanide risks. Facility level cyanide risks have been determined to be null for the local community. Cyanide risks to the community are related to transport risks which are under the responsibility of the cyanide supplier and its road transporter.
- CMM regularly communicates with the community with respect to cyanide management (refer to Principle 9).

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- The Emergency Response Plan is communicated annually to the town of Malartic and the local fire department.

*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:

- Primary and alternate emergency response coordinators as well as emergency response team members are identified, and their roles and responsibilities described in the emergency response plan. Training for all emergency response personnel is described and emergency callout procedures are in place.
- The plan presents a list of response equipment available on site as well as available through external service providers. On-site equipment is inspected monthly.
- External responder roles are described in the emergency response plan. These have been made aware of their roles and are periodically involved in simulation exercises. The site has also contracted an external service provider to respond to spills, including cyanide related spills and rehabilitation.
-

*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 **with Standard of Practice 7.4**
☐ not in compliance with

Basis for the finding:

- The emergency response plan provides contact details for external agencies, response providers and medical services as well as information for notifying management. Responsibilities regarding communications is provided.
- The ERP and crisis management plan include responsibilities and contact information for notifying potentially affected communities of cyanide related or other incidents and for communicating with media. Response measures for potentially affected communities

would involve public security authorities at the local, regional, provincial, and federal levels depending on the extent of the event.

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

*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 Emergency Response Plan refers to remediation measures in the event of a cyanide release. The plan specifically prohibits the use of sodium hypochlorite, ferrous sulphate, or hydrogen peroxide to treat cyanide spills.
- The facility's procedure for cyanide spills outlines requirements for spill clean-up, including recovery of solutions. Outside spills to soil or other would initiate implication of external specialists. The external specialist would be responsible for analyses to be performed including what final cyanide concentration will be allowed in residual soil as evidence that the release has been completely cleaned up (in line with jurisdictional and ICMI requirements). Additionally, the external specialist would be responsible for the appropriate disposal of soils and other media contaminated with cyanide including the provision of proof of disposal / destruction. A procedure is also in place that outlines monitoring requirements in the event of a spill, including methodologies and parameters, and where there are potentials for spills to surface water, sampling locations.
- There is no need to provide an alternate drinking water supply since a cyanide spill would not affect drinking water at the site – drinking water is supplied by the municipality which is outside of CMM's area of influence.

*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

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Basis for the finding:

- The ERP is reviewed at least annually. Changes are also made as team members change, subsequent to facility changes that can have an impact on the plan, and as a result of the post-mortem assessments of exercises or actual events.
- A schedule for the emergency drills, including cyanide exposure scenarios, is in place. Forms are used to debrief the exercises so that lessons learned are documented and actioned, including potential for revising the ERP.
- Emergency exercise scenarios involving cyanide are conducted annually. These include simulations and table-top exercises. Typically, two (2) exercises are conducted annually and pertain to cyanide liquid or gas releases, and cyanide exposure scenarios. Internal emergency response personnel as well as other potentially involved personnel, such as security agents and communications personnel are involved. When possible, external emergency response personnel (i.e., fire department) participate in the exercises.
- Post-mortems are conducted subsequent to each exercise. A report is produced that detail the context and objectives of the exercise, the persons involved, a description of the exercise scenario, a detailed breakdown of the progression of the exercise, observations, and required improvement actions.
- There have been no major cyanide related incidents or emergencies at the site to date.

## 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:

- All persons (i.e., employees, contractors (including security and janitorial personnel), and visitors) who will be autonomous at the site receive orientation training that includes hazards related to the presence of cyanide and its use. The orientation requires the completion of a questionnaire. In addition, all persons who access the mill receive additional mill specific training that reiterates cyanide exposure dangers. Personnel who are accompanied at all times do not require training. Training topics cover: Use of cyanide

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in the mill (where, for what and how to identify presence of cyanide), the dangers related to cyanide and symptoms of exposure, first aid measures, and means of control in place in the concentrator to prevent exposure.

- Mill personnel, including contractors, receive annual cyanide hazard refresher training. In addition, cyanide orientation training must be redone if a worker has been absent for a year or more.
- Emergency response personnel receive annual refresher training on cyanide and other chemical response measures.
- Other personnel, such as environmental staff, tailings operators, security personnel, etc. who may encounter cyanide receive periodic refresher training, including being involved in scheduled mock scenarios.
- Training presentations and records, for both employees and contractors, are maintained in the facility's software training platform. The names of persons who participate in cyanide refresher training during monthly health and safety meetings are maintained electronically by individual departments.

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| *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:

- Training is completed on the procedures in place, including tasks associated with unloading, production and maintenance. The procedures include considerations for worker health and safety and prevention of / reaction to cyanide releases. A complete training profile package has been developed for each mill and maintenance position. Backfill plant operators receive the same training package as mill operators. Mill maintenance personnel also receive training on self-contained breathing apparatus and high-risk work (ex. confined space, lock-out tag out, etc.). Tailings personnel, including contractors, receive cyanide hazard training (video) as their risk of exposure was determined to be low through risk analysis.
- Training is completed for the tasks and procedures undertaken for each job position, including tasks involving cyanide management. Training accompaniment booklets have been developed for mill positions and are used as checklists to ensure required items are covered and to evaluate acquired competencies. Training materials consist of the procedures for specific jobs, as well as PowerPoint presentations and quizzes summarizing cyanide-specific tasks, risks and requirements.

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- Experienced peers act as trainers on activities relating to cyanide handling and management. Training accompaniment booklets have been developed for mill positions and are used as checklists to ensure required items are covered and to evaluate acquired competencies. A daily evaluation is conducted and noted in the trainees personal training accompaniment booklet and includes job task observations. Training concludes with a written test and a practical evaluation. Peers are trained internally to be able to assess their trainees.
- Supervisors are responsible for ensuring that workers under their responsibility are trained. Workers are not allowed to undertake tasks for which they have not been trained.
- Mill personnel, including contractors, receive annual cyanide hazard refresher training. Refresher training is also provided in cases where a person has been trained but has not done the job for a year. Procedures that are not regularly applied are reviewed through the job safety analysis process prior to conducting the task. Emergency Response personnel receive annual refresher training on cyanide and other chemical response measures. Other personnel receive periodic refresher training, including being involved in scheduled mock scenarios (e.g., environmental staff, tailings operators and various other staff that may encounter cyanide).
- All persons (i.e., employees, contractors (including security and janitorial personnel), and visitors) who will be autonomous at the site receive orientation training that includes hazards related to the presence of cyanide and its use. Orientation requires the completion of a questionnaire – passing criteria is 60%. Annual cyanide hazard refresher training consists of reviewing the cyanide orientation training video as a group during monthly health and safety meetings and responding to verbal questions. A job observation program is in place and is conducted by supervisors. Objectives for observations are established and performance is tracked.
- Electronic copies of training records are maintained for life of mine in portable document format (PDF) and include the names of the employee and the trainer, training subject/title, duration, and evaluation results (for theoretical and practical evaluations).

*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 **with Standard of Practice 8.3**
☐ not in compliance with

Basis for the finding:

- Training for all mill personnel, including unloading, production and maintenance staff, includes procedures to be followed in the event of a cyanide release. The emergency response team is trained for cyanide decontamination and first aid. The spill management procedure stipulates that if the event involves cyanide, the emergency measures team

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must take charge of decontamination. All persons (i.e., employees, contractors (including security and janitorial personnel), and visitors) who will be autonomous at the site receive orientation training that includes hazards related to the presence of cyanide and its use, and emergency notification procedures.

- Site Emergency Responders receive training regarding the Emergency Response Plan for cyanide, including necessary equipment (personal protective equipment and response equipment). The team also receives annual hazardous materials response training as part of their certifications. The effectiveness of cyanide training is evaluated by testing and through debriefs conducted after exercises and mock scenarios (drills). Personnel involved in responding to cyanide incidents are involved in annual mock scenarios involving cyanide. Nursing personnel and first responders also receive cyanide related training.
- The Emergency Response Plan is communicated annually to the town of Malartic and the local fire department. The latter also conduct an annual site visit and participate in periodic on-site emergency practices and exercises (CN spill exercises, rescue at heights, and confined space rescue), and exercise and response event post-mortems.
- Emergency Response personnel receive annual refresher training on cyanide exposure and other chemical response measures. Personnel involved in responding to cyanide incidents are involved in annual mock scenarios involving cyanide. Other personnel receive periodic refresher training, including being involved in scheduled mock scenarios (e.g., environmental staff, tailings operators and various other staff that may encounter cyanide). The training includes cyanide exposure response.
- Electronic copies of training records are maintained for life of mine in portable document format (PDF) and include the names of the employee and the trainer, training subject/title, duration, and evaluation results (for theoretical and practical evaluations).

## 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:

- An exchange and monitoring committee is in place and meets quarterly. The committee is composed of, among others, CMM, representatives from nearby municipal governments, personnel from regional organizations (ex. health and social services centers, watershed

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organizations), community services, education, community citizens, and First Nations representatives. Annually, CMM presents cyanide incidents and corrective measures to the committee. Questions are also periodically raised by committee members with regards to cyanide.

- CMM exchange and monitoring committee agendas and minutes are available on-line.

*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:

- CMM publishes a leaflet explaining why and how cyanide is used at the facility as well as the measures taken by CMM to manage risks related to cyanide use and provides information on how to contact CMM with any questions, comments or concerns. The cyanide management leaflet is available in English and French on CMM's website and is available in hardcopy format at CMM's community relations office in Malartic. The local population is predominantly literate.
- An exchange and monitoring committee is in place and meets quarterly. The committee is composed of, among others, CMM, representatives from nearby municipal governments, personnel from regional organizations (ex. health and social services centers, watershed organizations), community services, education, community citizens, and First Nations representatives and is the
- Annually, CMM presents cyanide incidents and corrective measures to the committee. Incidents are presented in-line with the following cyanide release or exposure incidents:
    - Cyanide exposure resulting in hospitalization or fatality;
    - Cyanide releases off the mine site requiring response or remediation;
    - Cyanide releases on or off the mine site resulting in significant adverse effects to health or the environment;
    - Cyanide releases on or off the mine site requiring reporting under applicable regulations; and,
    - Releases cause applicable limits for cyanide to be exceeded.
- Summaries are also presented in annual committee reports.

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