International Cyanide Management Code Mining Operation Recertification Audit

Summary Audit Report

Report Prepared for

Stibnite Gold Project

Perpetua Resources
13181 Highway 55
PO Box 429
Donnelly, Idaho 83615

Report Prepared by

Mountain Valley Professionals, LLC
MVP Project No.: P-HAP(SGP)2025.86

June 4 2026

Stibnite Gold Project

International Cyanide Management Code

Pre-Operational Certification Summary Audit Report

Stibnite Gold Project

13181 Highway 55

PO Box 429

Donnelly, Idaho 83615

Mountain Valley Professionals
59 Damonte Ranch Parkway,
Suite B, # 298
Reno, Nevada 89521

e-mail: john.barber@mvp-nv.com
website: www.mvp-nv.com

Tel: (775) 636-5999

Table of Contents

Operational Contact

Mine Operations:	Stibnite Gold Project
Mine Owner:	Perpetua Resources Idaho, Inc.
Name of Operator:	Stibnite Gold Project
Name of Responsible Manager:	Travis Walker, *Operations General Manager*
Address and Contact Information:	Perpetua Resources Idaho, Inc. P.O. Box 429 13181 Hwy 55 Donnelly, Idaho 83615
Email Contact:	travis.walker@perpetua.us
Telephone Contact:	208-901-3060

Location & Description of the Operation

Perpetua Resources Idaho (Perpetua) is developing the Stibnite Gold Project (SGP) located in central Idaho, USA. The SGP is situated in the historic Stibnite Mining District in Valley County near the community of Yellow Pine, approximately 65 miles from Cascade, Idaho (see **Figure 1**). The Stibnite Mining District has an active history of mining from the 1920's through to the 1950's including gold, antimony, tungsten, and silver. Following which, mining activity declined and had largely stopped by the late 1990's. **Figure 1** shows the location of the SGP and nearby communities.

The proposed SGP development, as described in the ModPRO2 (Perpetua Resources 2021), includes three open pits (Hangar Flats, West End, and Yellow Pine), an ore processing facility, a lined tailings storage facility (TSF), a tailings/reclaim water pipeline, a TSF Buttress composed of development rock, a temporary fishway and tunnel diversion of the East Fork of the South Fork of the Salmon River, haul roads, access roads, upgrades to and extensions of an existing transmission line into the SGP site, employee housing, and ancillary facilities and infrastructure. The general timeline for the SGP is approximately 23 years, including 3 years of site preparation, construction, and early restoration activities; 15 years of operations; and 5 years of final closure and reclamation work, not including final TSF closure and long-term process water treatment which continues for approximately 25 years post operation. At full operation, the SGP will process ore at a rate of 20,000 to 25,000 tons per day; approximately 115 million tons of ore will be processed over the life of the mine. The SGP is expected to produce approximately 4 to 5 million ounces of gold, 2 to 3 million ounces of silver, and 100 to 200 million pounds of antimony (as stibnite [antimony sulfide] concentrate).

Overview of Proposed Operations

The primary purpose of the SGP ore processing facility is to separate gold, silver, and antimony bearing minerals from host rock to produce gold and silver doré, and stibnite concentrate. The ore is crushed and ground to liberate valuable minerals for further treatment. Sulfide ores are subjected to flotation to separate sulfide minerals from the non-sulfide minerals. A stibnite concentrate product is generated by flotation when economically recoverable antimony concentrations are present. A gold-silver-bearing sulfide concentrate produced from sulfide ores is pressure oxidized so that the precious metals can be easily leached with cyanide. Gold and silver from the leach solution are adsorbed on activated carbon, stripped from the carbon, precipitated by electrowinning, melted, and cast into doré bullion as a salable product. Tailings from the internal processes are transported in slurry form via pipeline to the TSF. **Figure 3** presents the SGP Ore Processing Flowsheet.

Current Status of SGP

SGP is currently in the pre-operational detailed design stage, and is undergoing federal and state permitting processes. A Final Environmental Impact Statement for SGP was released in September 2024, and the US Forest Service issued a Final Record of Decision approving the use of National Forest Land for the SGP in January of 2025. As of the time of this audit, Perpetua reports having obtained a Phase 1 Cyanidation Permit from the Idaho Department of Environmental Quality (IDEQ) that permits site preparation and the construction of the SGP TSF. Detailed design of the TSF has been completed. A Phase 2 Permit from IDEQ for the construction of the mill is still in development, and Perpetua estimates that this permit is approximately 12 months from issuance. Overall design of the mill and other aspects of the SGP are currently estimated by Perpetua to be 25 to 35 percent complete.

Cyanide Facilities

Per the definition of "cyanidation facility" provided in Title 39, Chapter 1 of the Idaho Code, the features of the SGP that collectively make up the ore processing cyanidation circuit or "cyanidation facility" include: (1) facilities within the ore processing area where cyanide storage and use will occur, and stormwater collection ponds to which drainage from those areas reports; (2) the TSF; and (3) a tailings delivery pipeline/reclaim water pipeline between the ore processing facility and the TSF, and the associated TSF pipeline pond. These cyanidation facility components are and primary SGP mine features are illustrated in **Figure 2**.

The facilities that are used in the cyanidation of ore for metals extraction are considered to represent the "cyanidation facility" as defined in Section 39.103, Idaho Code, and are listed below:

- Reagent and sodium cyanide storage (dry), mixing and distribution (liquid) (Reagent Building No. 2)
- Grinding and Pebble Crushing
- Antimony and Gold Flotation
- Pressure Oxidation
- Cooling and Neutralization
- Cyanide Leaching (Sulfide) and Recovery
- Sulfide Leach Tailings Detoxification
- Carbon Handling, Electrowinning, and Refinery
- Tailings Pipeline Pond
- North and Central Plant Ponds
- Tailings Thickening, Pumping, and Water Reclamation
- Tailings and Process Water Pipelines
- Tailings Storage Facility (see TSF Operations, Maintenance, and Surveillance (OMS) Manual [TGI, 2024])
- Cyanidation Facilities – Year 7 (Included here for Reference only)
    - Atmospheric Arsenic Precipitation
    - Oxide-Tailings Leach/CIP
    - Oxide-Tailings Detoxification

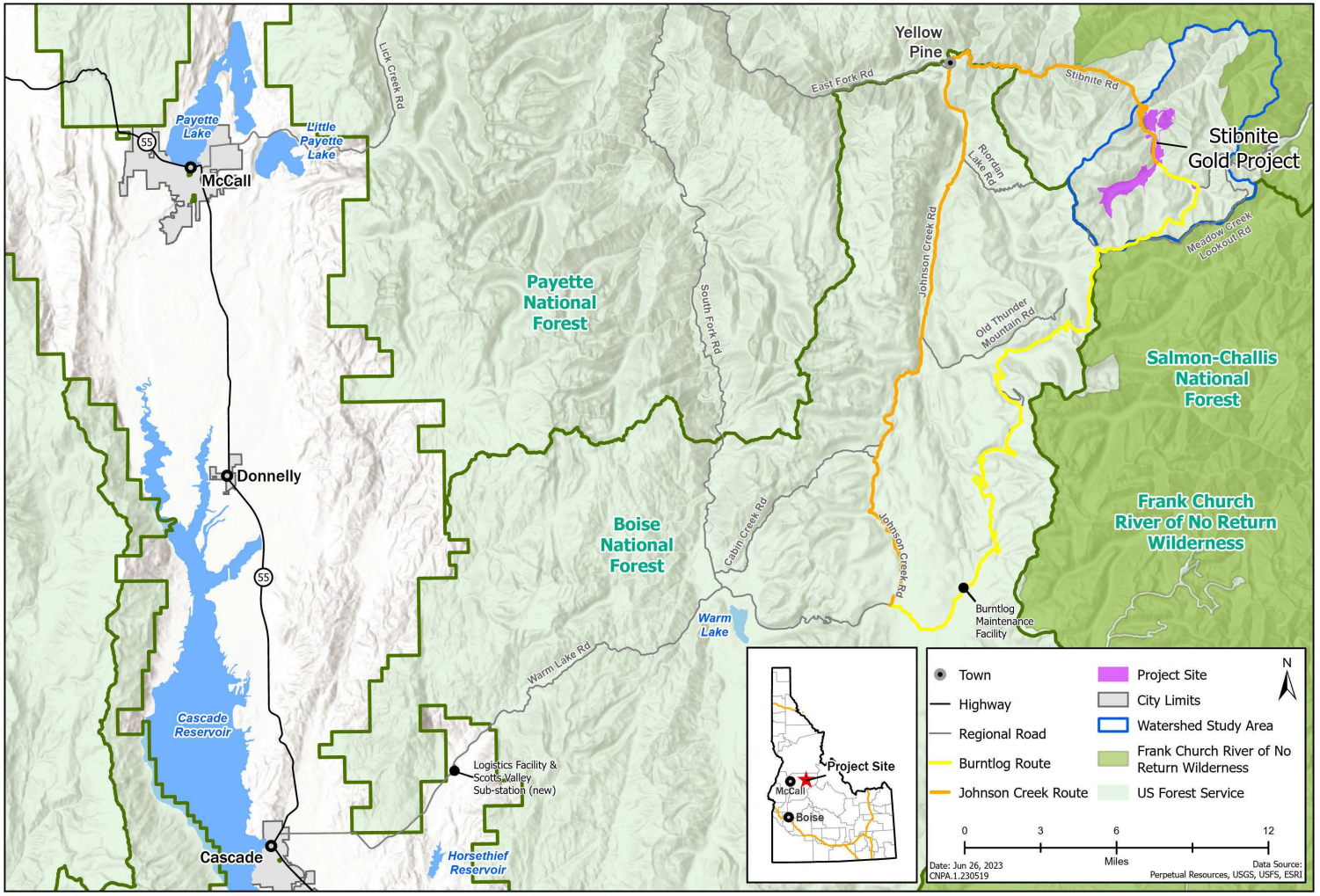

Figure 1 –Location of the Stibnite Gold Project

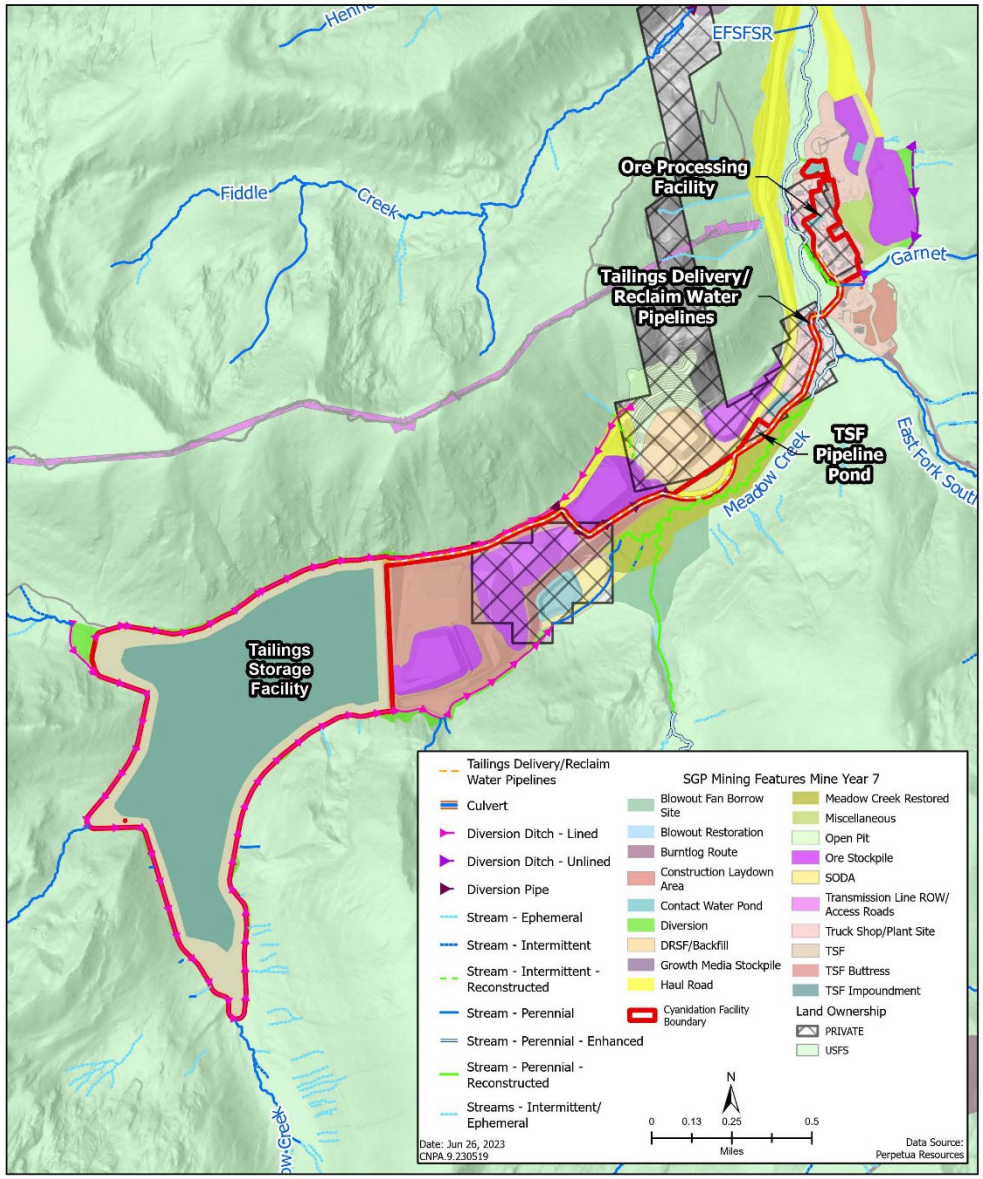

Figure 2 – Primary Features of the Stibnite Gold Project, and Cyanidation Facility Boundary (Red Outline)

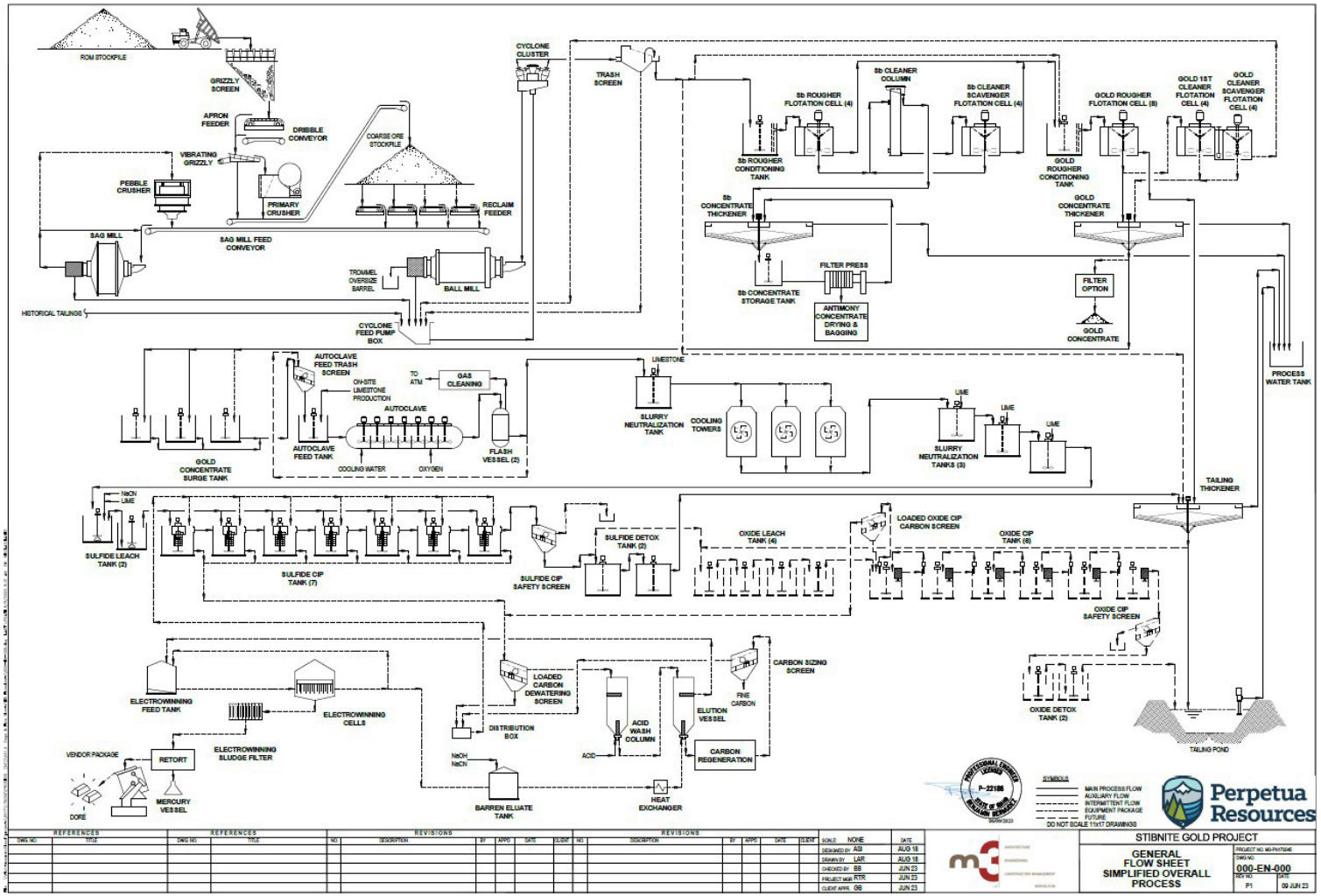

Figure 3 – Overview of the Ore Processing Facility

Auditor Information

Stibnite Gold Project	☒ **in full compliance with** ☐ in substantial compliance with ☐ not in compliance with	**The International Cyanide Management Code**

The auditor has determined that the Stibnite Gold Project is in **Full Compliance** for this ICMC audit.

Audit Company: *Mountain Valley Professionals, LLC*
59 Damonte Ranch Parkway, Suite B #298
Reno, Nevada 89521
www.mvp-nv.com

Audit Team Leader: Evan Jones
Lead Auditor & Mining Technical Auditor

Email: evanjones@shaw.ca

Audit Dates

The pre-operational audit was conducted over the period of September to December 2025. No site visit was conducted as the facility was not yet under construction at the time of the audit. All documentation and information reviewed was provided electronically, and interviews were conducted remotely. Due to the completeness of the documentation provided in-person interviews were not required.

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

I attest that this Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Institute for Mining Operations Verification Protocol (2021) and using standard and accepted practices for health, safety, and environmental audits.

Date: June 04, 2026

Operation Name: Stibnite Gold Project

Signature of Lead Auditor:

PRINCIPLE 1 – PRODUCTION & 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 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

Summarize the Basis for this Finding or Deficiencies Identified:

Cyanide has not yet been purchased for use at SGP, as the mine is in the pre-operational stage. Records of cyanide purchases are therefore not available for review. However, as documented in a Perpetua Resources memorandum to file dated September 28 2025, Perpetua Resources has committed to the purchase of cyanide for SGP only from manufacturers that are certified to the ICMC.

The auditor reviewed draft Tender Documents provided by Perpetua that will be used to solicit tenders from cyanide suppliers for SGP once the operations are ready for cyanide deliveries. The Tender Documents include an opportunity to incorporate mandatory requirements for tenderers in multiple locations, including the Scope of Work (as Technical Specifications and/or Design Criteria), and require the tenderer to complete a Statement of Conformance with the tender requirements. The use of these Tender Documents, once finalized and with ICMC certification included as a mandatory requirement, will be the primary controls to ensure that cyanide for SGP is purchased only from ICMC certified manufacturing facilities.

Perpetua has identified two potential suppliers of cyanide for use at SGP; Orica and Draslovka. The auditor reviewed ICMI Summary Audit Report re-certification reports for cyanide manufacturing facilities operated by these companies, and confirmed that Orica's Houston and Winnemucca manufacturing facilities had been re-certified to the ICMC in 2023 and 2026 respectively, and Draslovka's Memphis manufacturing facility, which was re-certified to the ICMC in 2023, and that all certifications remain in good standing with ICMI. All three facilities are capable of supplying SGP with cyanide manufactured at an ICMC compliant facility.

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 with
☐ not in compliance with

Standard of Practice 2.1

Summarize the Basis for this Finding or Deficiencies Identified:

Cyanide has not yet been transported or delivered to SGP, as the mine is in the pre-operational stage. Chain of custody records or other delivery documents are therefore not available for review. However, Perpetua has committed to the delivery of cyanide to SGP only by transporters that are certified to the ICMC.

The auditor reviewed draft Tender Documents provided by Perpetua that will be used to solicit tenders from cyanide suppliers for SGP once the operations are ready for cyanide deliveries. The Tender Documents include an opportunity to incorporate mandatory requirements for tenderers in multiple locations, including the Scope of Work (as Technical Specifications and/or Design Criteria), and require the tenderer to complete a Statement of Conformance with the tender requirements. The use of these Tender Documents, once finalized and with ICMC supply chain certification included as a mandatory requirement, will be the primary controls to ensure that cyanide for SGP is delivered only by ICMC certified transporters.

SGP will receive cyanide deliveries shipped directly from manufacturers. Perpetua has identified two potential suppliers of cyanide for use at SGP, both of which provide transportation services as well as manufacturing; Orica and Draslovka. The auditor reviewed ICMI SAR re-certification reports for cyanide delivery supply chains from the manufacturing facilities operated by these companies. Orica's North America Rail and Truck Supply Chain certification covers cyanide shipments from their Houston and Winnemucca manufacturing facilities, and Draslovka's US Supply Chain certification covers shipments from their Memphis manufacturing facility. The Orica Supply Chain was re-certified to the ICMC in 2022 and their certification remains in good standing with ICMI. The Draslovka Supply Chain was re-certified to the ICMC in 2025 and their certification remains in good standing with ICMI.

PRINCIPLE 3 – HANDLING & 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 with
☐ not in compliance with

Standard of Practice 3.1

Summarize the Basis for this Finding or Deficiencies Identified:

The SGP is located within the Payette National Forest and the Boise National Forest, with the nearest community being Yellow Pine, approximately 10 miles by air to the east. There are no nearby land uses where members of the public or other people not affiliated with the SGP operations may be present. The reagents storage area and mill site are located in an area with nearby surface water bodies including Garnet Creek, Meadow Creek, and the East Fork South Fork Salmon River. The General Process Plant Plan Drawing show that these facilities are located within a Cyanide Facility Boundary surrounded by a perimeter access road that provides separation, containment and surface water redirection to prevent releases from the process areas flowing to the surface water bodies.

The facilities are still undergoing design but the unloading, storing, and mixing cyanide facilities are being designed by Professional Engineers applying design criteria prescribed by corporate, regulatory, and ICMC standards. Cyanide unloading, mixing, and storage will occur in Reagent Building 2 which is equipped with a solid concrete floor slab and containment sumps that will prevent or minimize seepage to the subsurface. ISO-containers containing solid cyanide briquettes are delivered by truck to the unloading area within Building 2, where the contents will be dissolved in a recirculating solution and pumped into reagent storage tanks within the building. Leakage from the ISO-container system will be contained in these areas and recoverable from the containment sumps. Tanks used for mixing, storing, and/or processing of cyanide and cyanide solutions will be equipped with ultra sonic level indicators and alarms. The level indicators are to be interlocked with the area pumps to prevent overfilling, at alarm levels to be set upon facility startup. Level indicators are to be verified prior to every offload event by the area operator.

Engineering drawings and specifications are being produced for these facilities by M3 Engineering (M3) and by Ausenco. Versions of these drawings, dated and stamped by Professional Engineers licensed in the State of Idaho, were reviewed. The engineering materials reviewed included material / substance compatibility matrices, piping specifications, containment area calculations, and general arrangement drawings and layouts for the offloading, mixing and storage areas.

Reagents Building 2 is located away from people and protected from releases to surface water bodies by secondary containments and earthen berms. Garnet Creek, which flows in part through the proposed ore processing facility, will be protected by diverting it along the access road in a riprap lined channel and directed by culverts under the access road to a new stream channel downstream of the plant site. Stormwater and surface runoff within the ore processing area will be captured and directed to the Plant ponds where the water may be used for ore processing.

The process that has been established by Perpetua for the design of the SGP should result in a design that conforms with applicable jurisdictions rules and accepted engineering practices, while incorporating ICMC standards. Facilities that are constructed in accordance with the designs reviewed in this audit will comply with the requirements of this Standard of Practice.

The Operation proposes to receive cyanide in ISO-containers in an area to be entirely within the weather proof Reagent Building 2 within a containment area that has a concrete floor and a concrete sump, minimizing the potential for contact of solid sodium cyanide with water. The OMP states that building ventilation and fixed Hydrogen cyanide (HCN) monitors in the building will direct and minimize the buildup of HCN gas. The GA Drawings show the perimeter of the Cyanide Facility Boundary into which entry is restricted to trained Process personnel and the Facility Boundary will be signed and will be within a secure area. The design documents show that the other reagents stored in Reagent Building 2 will be Lime, Sodium Metabisulfite, and Sodium Hydroxide, which are suitable materials to store with cyanide. Facilities that are constructed in accordance with the designs reviewed in this audit will comply with the requirements of this Standard of Practice.

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

Summarize the Basis for this Finding or Deficiencies Identified:

Cyanide is to be delivered to the site in ISO-containers that are owned by the cyanide supplier, and will remain in the supplier's possession and control throughout the delivery and emptying, before being sealed and returned to the supplier's facilities. The ISO-containers are not handled or removed from the supplier's truck while on site. Other containers such as drums, plastic bags, and liners are not to be used, and cyanide containers are not stacked at this site. The cyanide supplier driver / mix operator is responsible to inspect and close the ISO containers including inlet and outlet valves, and rinse off the connections, transfer hose ends, connection hoses, fittings, and the cyanide containment area following the transfer. Rinse water would flow into a containment sump and be transferred back to the process. If a bigger spill or release were to occur in this area, the operator is instructed to contact their supervisor and initiate the Emergency Response Plan.

The SGP Operations Management Plan and the Standard Operating Procedure PR-PROCESS-03 describe the operation of all hoses, valves and couplings involved in unloading and mixing of

cyanide, and also require a pre-use check of the equipment to verify that maintenance is not required. The SOP provides an overview of the hazards posed by cyanide and requires the use of PPE including hard hat, safety goggles and face shield, respirator, chemically resistant coveralls/rain suit, steel toed chemical resistant boots, and chemical resistant gloves. A portable HCN monitor must also be worn. The SOP describes the roles of the Operator and the truck driver, both of whom are to be in attendance during the unloading activity. The unloading activity is also observed from the control room via a remote camera. The OMP and SOP require that the cyanide solution be dyed pink/red by the manufacturer, and the offload checklist includes verification of the color during the mix tank transfer. Additional details regarding preventive maintenance programs are expected as the facility proceeds towards operations.

Operations that are conducted in accordance with the procedures reviewed in this audit will comply with the requirements of this Standard of Practice.

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
☐ not in compliance with

Standard of Practice 4.1

Summarize the Basis for this Finding or Deficiencies Identified:

The operation has developed written management plans and operating procedures for cyanide facility operations that include unloading and mixing, storage, Processing, tailings management, and cyanide destruction. The SGP Operations Management Plan (OMP) is owned by the Process Department and includes a description of cyanide facility operations from delivery and unloading to detoxification, including the design criteria, process control methods, inspection and maintenance programs, and contingency operations. Appended to the OMP are four Standard Operating Procedures that address in detail the procedures for containment inspections, detoxification, offload and mixing, and equipment decontamination. The development of additional SOPs is anticipated as the facility design and equipment selection progresses.

The Tailings Storage Facility Operations, Maintenance, and Surveillance (TSF OMS) Manual includes SOPs for tailings deposition, containment, and water management, as well as design criteria, maintenance, and other operational controls. The Manual provides operating objectives, procedures, and monitoring strategies for the TSF operations. As with the OMP, refinements and additions to the TSF procedures are expected as design progresses and operations commence

The OMP, SOPs, and TSF OMS Manual provide specific guidance based on the facility design parameters and regulatory requirements to prevent and control cyanide releases and exposures. Examples include the minimum target pH in mixing solutions to minimize HCN generation, maximum WAD Cyanide in tailings discharges, and minimum freeboard requirements for the TSF. The design is predicated on zero discharge of contact / process water from the ponds and therefore no cyanide is anticipated in discharge waters to surface water bodies.

The operation's plans and procedures describe inspection, maintenance, and water management procedures necessary for the protection of workers, communities, and the environment. The SOPs include water management methods to maintain the required freeboards and conditions for typical operations, and for excess water management under seasonal or emergency conditions, or in the case of unplanned shutdowns, including overdrain, leak collection and recovery, underdrain, and diversion channel operations.

The OMP presents a Cyanidation Facility Inspection Matrix of operational or functional areas and inspection frequencies varying from daily to annually. The OMP requires that all audits, inspections, and corrective actions be documented, and that work orders resulting from cross-functional audits and inspections be entered into a site work order system for tracking and closure of corrective actions. The TSF OMS Manual also includes a table of required inspections, including twice weekly and quarterly inspections, that assess all aspects of those systems.

The operation has designed a Management of Change (MoC) procedure that is to be employed

for planned changes that may substantively impact mine operations. The procedure identifies triggers for initiating the MoC process, such as changes requiring an Authorization for Expenditure (AFE), or changes involving process, environmental, health and safety, and permit/regulatory considerations. The OMP states that the MoC procedure may also be implemented as a result of inspections, corrective actions, audits, accident/incident reviews, and employee inputs during pre-shift, safety, and other meetings. Change requests are distributed to appropriate department managers for review, and each reviewer may deny, approve, or conditionally approve the change request. Any MoC involving cyanide-related process changes will be routed to environmental and safety managers for review. A Decision Register Template has been prepared to record the outcome of engineering and design decisions. Examples of completed MoC processes are not yet available for review as the facility is in the design and pre-operational stages.

The operations have considered non-standard operating situations. The Water Management Plan (WMP) describes water management strategies for seasonal and excess water conditions, emergency events, and unplanned temporary shutdowns. The plans address sudden (unplanned) closure and care and maintenance closure, and specify measures for the management, containment, stoppage, and monitoring of all cyanide-related processes. The TSF OMS Manual requires inspections following emergency or significant climatic events, and provides procedures to respond to emergencies resulting from water balance events. The TSF OMS Manual addresses the temporary cessation of operations, including planned mill shutdowns, and unplanned shutdowns resulting from extreme rainfall, low temperatures, and earthquakes, and includes measures for stopping and containing any cyanide-related flows.

Inspection results and corrective actions are to be recorded on the inspection forms, and follow-up work orders are to be created. Corrective actions resulting from cross-functional audits/inspections are to be entered into the site-wide work order system, including due date, responsibility, and risk level. The OMP and TSF OMS Manual address temporary and seasonal closures, sudden (unplanned) closures, and care and maintenance closure.

The operations procedures require once-per-shift inspections of cyanidation facilities, to be completed by the shift operator. The checklist form will prompt for inspection of tanks for corrosion or leak, and formation of cyanide salts, among other factors. Inspection forms provided with the SOPs include the date and name of the inspector, and record the inspection results (positive and negative) and the details of required corrective actions.

In addition, weekly inspections of reagent grade and strip solution grade cyanide systems are to be conducted by operations supervisors, and containment system inspections will be conducted by senior level operations and safety personnel on a monthly basis, including the TSF. The three ponds (North Plant, Central Plant, and TSF Pipeline Ponds) are to be inspected on a daily basis for wildlife / wildlife mortalities, fencing, accumulations, and cyanide concentration. The lined TSF Pipeline Pond is also inspected for liner integrity, and leak collection and recovery systems. Inspection requirements for the TSF include freeboard and slope/bank conditions. Checklists to support inspections under the TSF OMS Manual have not yet been developed but would be expected to follow a similar design to the SOPs checklists.

Inspections have not yet taken place and the operations are in the design and pre-operational stages; it is expected that the inspection frequency will be reassessed and possibly adjusted as operations begin.

While a Preventive Maintenance and Work Order system has not yet been selected, the OMP states that a third party database platform will manage all cyanidation facility plant assets and

will include breakdowns and planned maintenance. The OMP states that the preventive maintenance system will encompass pipelines, tanks, pumps, valves, ventilation systems, gas meters, pH meters, high/low level alarms, process control operating systems, eyewashes, showers, fire suppression, lighting, sumps, generators, discharge pipes, leak collection and recovery systems, and critical spare parts.

The OMP states that backup generation capacity will be provided in the event of the main power line being disrupted, and that the capacity will be sufficient to operate critical equipment required to maintain containment of all processing areas including the TSF, including pumping between the ore processing facility and the TSF. The critical equipment assessment, and identification of power demands and backup power equipment to operate the facility in the event of an emergency power outage, have not yet been determined as the facility is still in design stages.

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**
☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The OMP describes test work to be done once the facility is operational to optimize the use of sodium cyanide in the process. The program will be intended to minimize NaCN consumption while maximizing gold recovery, and to minimize the use of cyanide destruction chemicals while maintaining target levels of WAD cyanide in TSF spigot discharges, for different types of ore. Testing of this nature will allow for optimizing addition rates once the facility is operational.

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

Summarize the Basis for this Finding or Deficiencies Identified:

The operations have completed a probabilistic water balance using the GoldSim program. The water balance addresses all components of the cyanidation facility including the ponds and ore processing area, diversions, pipelines, and TSF. The water balance considered a variety of storm events, pond freeboard requirements, snowmelt and potential process water and pipeline contents, and inflow design floods plus wind/wave effects. The water balance includes considerations such as water treatment plant capacities, reclaim water system, drainage, recycling of solution from overliner drains, natural evaporation rates, mechanical evaporation, tailings (solids/water) deposition rates, and the effects of potential power outages or pump and other equipment failures. The Water Balance considers site meteorological data collected since

2013, augmented by long-term climatic records. The Water Balance is to be maintained and managed by the Process Department, in consultation with the Environmental Department, and updated as the need for changes are identified.

The water balance was prepared by Perpetua and signed and sealed by a Professional Engineer registered to practice in the State of Idaho. The model used data prepared for the purpose including the WMP (prepared by Brown and Caldwell) and the TSF design report (prepared by Tierra Group International Ltd.), as well as an SGP Drainage Report prepared by M3 Engineering and Technology Corp.

The TSF has not yet been constructed but the specifications of design freeboard conditions under various operating scenarios are described in the TSF OMS Manual, the Water Balance Model Report, and the WMP. Consistent with the Water Balance and WMP, the TSF is designed with reserve capacity to store the 24 hour PMF volume from the entire upgradient watershed (i.e., assuming diversions fail) in addition to the normal operating pool and additional freeboard for wind/wave effects plus 2 feet of dry freeboard. Designs for the TSF Pipeline Pond stipulate a 2 foot freeboard requirement based on a pond capacity of 110 percent of the tailings delivery and reclaim water pipelines plus direct precipitation from a 100-year, 24 hours storm event and 90th percentile snowmelt. Designs for the North Plant Pond and Central Plant Pond also require a 2 foot freeboard based on stormwater collection volumes from similar storm events

The TSF OMS Manual prescribes routine inspections (twice a week at minimum) and detailed inspections (quarterly). The inspections include, among other factors, ensuring sufficient embankment freeboard, inspecting diversions for blockages, and measuring flow.

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
☐ not in compliance with

Standard of Practice 4.4

Summarize the Basis for this Finding or Deficiencies Identified:

The facility design requires that detoxification plant discharges be less than 40 ppm WAD cyanide in normal operations. The operation has committed to sampling and testing for WAD cyanide twice per shift at the final tails pump box water, to confirm that concentrations at the TSF are maintained at or below target levels. Alert/action levels will be set at 40 and 45 ppm. As a result, no ponds or impoundments are expected to have WAD cyanide in excess of 50 mg/L, and measures such as wildlife fencing or netting are not required. Should temporary use of the tailings pipeline pond be required for secondary containment of slurry or solutions, the OMP states that testing will be conducted to determine if wildlife protection measures are necessary.

As the facility is in the design stages, there has been no monitoring of wildlife that would support the effectiveness of a WAD cyanide limit of 50 ppm. It is expected that monitoring will commence along with the operations, and that an assessment of effectiveness will be made after that time.

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

Summarize the Basis for this Finding or Deficiencies Identified:

The ore processing facility is designed to operate as a closed loop system, eliminating any discharge of treated process water to surface or groundwater during regular operations. Direct discharge of non-contact, non-process water would be permitted under the State regulatory agencies, and is not expected to contain any cyanide concentrations. Surface water monitoring locations, including downstream of discharge point(s), will be established as operations are permitted and monitoring will commence as operations commence. Compliance limits and Early Detection Thresholds (EDTs) for cyanide in surface water include sampling points in all surface water bodies around the project site.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

The TSF OMS Manual calls for the construction of a Leak Collection and Recovery System for the TSF that allows for the recovery of leakages through the primary liner. The design requires an underdrain system for collection of water from seeps and springs beneath the TSF impoundment that could build up pressure in the liner. The ore processing facilities are equipped with secondary containment to prevent the infiltration of cyanide solutions into the ground that may affect groundwater quality. Groundwater immediately beneath and downgradient of the facility is intended be used for potable use in the future mill, and will be extracted and treated for this use under a Permit to be obtained from the Idaho Department of Environmental Quality. The operation has been monitoring groundwater in the project area since 2012, and a groundwater monitoring well network to detect cyanide in groundwater will be set up for the site that includes wells downgradient of the TSF and of the ore processing area. It is expected that the groundwater monitoring program will be maintained and expanded as the facility design progresses and upon commencement of operations.

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

Summarize the Basis for this Finding or Deficiencies Identified:

The OMP states that all ore processing facilities containing tanks will have concrete secondary containment structures. Design drawings show concrete containment walls around all tanks in Reagent Building 2 including the sodium cyanide mix tank and distribution tank, and all tanks containing cyanide solutions. All tanks are shown to be placed on solid concrete footings and no ring foundations are shown. Joints in the concrete containments will contain water stops to retain fluids in the containment. Design documents provide secondary containment capacity calculations for the process tanks, both indoors and outdoors. The calculations are based on achieving a minimum of 110% capacity of the largest vessel in the containment for indoor tanks, and a minimum of 110% of the largest vessel in the containment area plus an allowance for precipitation for outdoor tanks. The design software excludes areas such as the tank footings and sumps from the calculation of capacity.

The designs and secondary containment capacities do not yet include allowances for the potential volume of solutions that may be contained in piping that would drain back to the tank. It is understood that, as the design progresses and the length and location of pipe runs are determined, the secondary containment capacity calculations will be enhanced to include allowances for pipe drainage. The design requires secondary containment for piping between secondary containments by equipping outdoor pipe racks with drip trays to capture pipe and fitting leaks. The drip trays will be sloped to low points with drains and piping to direct the flow to adjacent secondary containment areas. The TSF liner will provide secondary containment for tailings and reclaim piping on the TSF dam crest and perimeter. Secondary containment for the tailings and reclaim pipelines between the TSF and cyanidation facility is provided by a buried lined trench with the tailings pipe underlain by a geonet sheet and wrapped in welded Linear Low-Density Polyethylene (LLDPE) geomembrane sheeting. The reclaim line will share this containment trench. Pipeline leaks in this area will drain down the trench slope towards the cyanidation facility.

Containment areas and sumps are to be routinely inspected, and water collected within containment areas will be pumped out via area or portable sump pumps and introduced into the most appropriate cyanidation facility process circuit as the process operations are to be zero discharge. Tailings pipeline leaks can be detected by a leak detection cable under the pipe, and by inspection ports every 1,000 feet along the trench. A lined TSF Pipeline Pond will receive leaks captured by the containment trench.

Where roads or streams may cross the pipeline corridor, the wrapped pipes will be buried 6 feet below grade. The TSF Pipeline Pond is sized to contain the fluid of the estimated 7,000 feet of both pipelines contained in the trench.
Facilities that are constructed in accordance with these designs will provide adequate secondary containment for all cyanide unloading, storage, mixing, and process solution tanks.

The design documents provide an extensive assessment of material types and chemical compatibilities. For sodium cyanide solutions, these requirements include tanks and piping to be made of carbon steel or stainless steel.

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

Summarize the Basis for this Finding or Deficiencies Identified:

The project's Construction Quality Control Plan (CQCP) provides a framework for inspections to be conducted during construction of all cyanide facilities including the ore processing plant and tailings delivery and reclaim pipeline. The CQCP addresses; site, earthworks, and geomembranes; concrete works; structural steel; buildings and enclosures; mechanical equipment (including pumps, vessels, and tanks); welding piping; pipelines; equipment and pipe insulation; protective coatings; electrical; and, instrumentation. The CQCP includes responsibilities, construction completion procedures, completion checklists, and quality forms. The CQCP requires that inspection records be kept and as-built drawings be produced. The project's TSF Construction Quality Assurance Manual requires construction QC reports and TSF as-built construction records to be kept onsite.
As construction has not yet commenced, records are not yet available. Implementing the CQCP and TSF Construction QA Manual will meet the Code requirement of implementing a construction QA/QC programs.

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

The operation is

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

Summarize the Basis for this Finding or Deficiencies Identified:

The operation has developed written standard procedures for monitoring for the effect of cyanide use on wildlife, surface water, and groundwater quality, including the TSF and process area. Monitoring includes checks for wildlife sightings and mortalities, and upstream and downstream monitoring of groundwater and surface water. The procedures include the parameters to be monitored, sampling location, regulatory or site criteria, and the frequency of monitoring events. Procedures stipulate training requirements and qualifications for the sampling personnel, sampling methods, sampling handling and preservation, hold times, temperature requirements, analytical methods, field equipment, chain of custody for sample delivery to approved laboratories, laboratory equipment, and QAQC requirements. The procedures describe field data

that must be recorded in sampling events, and make reference to data sheets, field logbooks, and/or digital field data collection devices that will be used to capture this information. The sampling and analytical procedures have been developed specifically for the SGP operations by professional consultancy firms that employ qualified personnel.

Baseline sampling and analysis of surface water and groundwater has been undertaken dating back as far as 2012, and has informed the sampling frequency recommended by the authors of the sampling procedures. The frequencies proposed appear adequate to characterize the media and to detect changes in a timely manner. As operations have not yet commenced, implementation of these monitoring programs in full have not yet happened.

PRINCIPLE 5 - DECOMMISSIONING

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

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

The operation is

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

Standard of Practice 5.1

Summarize the Basis for this Finding or Deficiencies Identified:

The SGP Cyanidation Facility Permanent Closure Plan (PCP) provides procedures for the effective decommissioning of cyanide facilities, including the portions of the ore processing facility that contain process water or cyanide containing solutions, the tailings delivery and reclaim water pipelines, the TSF pipeline pond, and the TSF, and planned cyanidation facility boundary changes to be made during the course of the mine development until closure. Procedures are described for the neutralization of process water, tailings stabilization and cover, equipment decontamination and rinsing, demolition and disposal, and management of residuals. The procedures include a list of equipment to be neutralized and the specific procedures and equipment to be used in the decommissioning program. The Permanent Closure Plan provides a general timeline for the overall SGP from mine years -1 to approximately 40. The PCP includes monitoring programs during and following decommissioning to assess the effectiveness of the procedures for the protection of human health, wildlife, livestock, and the environment.

The TSF Dam Abandonment Plan calls for the use of the process water treatment plant to treat meteoric and tailings consolidation water from the TSF post closure, until water quality standards can be met passively and treatment is no longer required, assumed to be mine year 40. The process water treatment plant would then be removed in accordance with the procedures described in the PCP.

As the mine is pre-operational, the PCP has not yet been updated. However, the auditor observed evidence that the PCP has been developed with consideration given to reviewing and updating the requirements and procedures as operations may change over time, such as revision numbering and planned updates for known future boundary changes.

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

The operation is

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

Standard of Practice 5.2

Summarize the Basis for this Finding or Deficiencies Identified:

The PCP presents an estimate of the costs for closure and reclamation of cyanidation facilities, referred to as the SGP Financial Assurance Estimate. The estimate is prepared with the intent of satisfying regulatory requirements that appropriate financial assurance instruments be acquired such that, in the event the operator fails to complete the permitted closure activities, the regulatory agency can complete closure. The SGP Financial Assurance Estimate is being developed using the Standardized Reclamation Cost Estimator tool developed as a cooperative effort between the Nevada Division of Environmental Protection, U.S. Bureau of Land Management, and Nevada Mining Association, which utilizes standardized reclamation calculation methods, productivity data, and procedures to estimate costs associated with reclaiming a mine site, including permanent closure activities.

Line items in the SGP Financial Assurance Estimate related to permanent closure of the cyanidation facility are presented as the PCP Financial Assurance Estimate, and include neutralization of process water, removal of ore processing equipment and ancillary facilities, TSF closure, and closure monitoring, terminating in mine year 40. The costs have been developed based on an assumption that a third party will provide the closure services, using industry-standard unit rates and rates obtained from service providers. The total closure cost of cyanidation facilities as determined in the September 2024 version of the PCP (V1) is $206,860,000.

The operation has a State regulatory obligation to review and update its permanent closure cost estimate periodically (eg: every three years) or upon material change to the estimated reasonable cost, and the operation has committed to comply with regulatory requirements in the PCP. While no financial assurance has been posted currently due to the pre-operational stage of the project, Perpetua has committed in the PCP to refining and updating the SGP Financial Assurance Estimate and eventually submitting it to the regulatory agencies for review and approval prior to establishing the initial SGP Financial Assurance fund.

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

Summarize the Basis for this Finding or Deficiencies Identified:

The operations have developed Standard Operating Procedures (SOPs) for cyanide-related tasks that prescribe procedures and methods for the safety of workers conducting the tasks. The current set of SOPs addresses inspections of containments, operations of the sulfide leach tailings detoxification circuit, cyanide offload and mixing operations, and equipment decontamination prior to maintenance activity. The SOPs identify cyanide-related hazards and safety requirements including mandatory Personal Protective Equipment (PPE). The procedures address confined space entry, lock-out procedures, equipment rinse and flushing procedures, and provide information regarding the identification and appropriate response to cyanide exposures or spills.
Workers at the SGP are not currently engaged in cyanide handling processes, but are involved in site development and construction programs consistent with the pre-operational status of the project. Health and Safety procedures have been developed for these current activities as part of the site's Integrated Environmental and Occupational Health and Safety Management System, and involve a Worker Health and Safety Committee that collaboratively develops Job Hazard Assessments and/or Standard Operating Procedures. This committee is expected to operate in a similar manner while undertaking the development of health and safety procedures for the operational activities.

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 with **Standard of Practice 6.2**
☐ not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

The operation has established a target minimum pH of 11.5 in mixing solutions. SGP is in the process of establishing pH targets for process solutions based on testing currently underway, with the intention of incorporating the targets into operational plans and procedures.
The operations have identified areas where the risk of workers being exposed to HCN gas or cyanide dust is highest, and include the Cyanide Mix and Storage area, cyanide addition points, and the Cyanide Destruction areas. In addition, the operations have identified the work activities with the highest risk of exposure, including cyanide receiving and mixing, cyanide detoxification,

inspections of the cyanidation facilities, and equipment decontamination. Fixed HCN monitors have been planned for the Cyanide Mix and Storage area, cyanide addition points, and the Cyanide Destruction areas. The fixed monitors will have a warning alert setting at 2.5 ppm HCN, and an evacuation setting at 4.7 ppm. In addition, all workers involved in cyanide mixing, working within Reagent Building 2, and/or conducting maintenance personnel will be required to wear portable HCN detectors with the same advanced warning and evacuation alert settings. SOPs for these activities require the use of appropriate PPE to prevent exposure to HCN gas and cyanide dust. Training and employee education programs include a Cyanide Area Induction, Cyanide Awareness and Hazard Recognition, Cyanide Equipment User Training (Task Training), SDS training, and Cyanide Emergency Response Training.

These training programs are in development but the program outlines include topics such as the selection and use of appropriate PPE for the area and work activity, HCN monitors, alarm levels and response, and evacuation routes.

The SGP OMP describes inspection programs that include an assessment of HCN monitoring devices, safety equipment, and PPE signage. Planned preventive maintenance schedule programs for the SGP operations include monthly calibration and cleaning of HCN gas meters and alarm systems in the cyanidation facility area, and inspections of HCM meters on all of the Process Daily Plant Area Inspection Forms. Record keeping systems currently in place for site equipment inspections are to be expanded upon commissioning to include retention of cyanide-related process equipment records including HCN monitors for a minimum of at least 3 years. Emergency eye wash stations and safety showers are to be located in all process areas where cyanide and cyanide solutions are present. Inspection forms included in the OMP identify eyewash/showers and fire extinguishers as items for inspection in all of the Process Daily Plant Area Inspection Forms. Maintenance requirements for eyewash/shower and fire suppression equipment is included in the SGP Cyanidation Facility Preventive Maintenance Schedule. The OMP also states that dry powder or non-acidic sodium bicarbonate fire extinguishers will be placed at key locations within the cyanide facilities.

SGP plans describe the intent to install and maintain signage at each entrance (fence and/or building) to Reagent Building 2 and each entrance to the designated cyanide facility areas. The signage will identify the areas and buildings as restricted, and will list the PPE and Safety Data Sheet (SDS) requirements. In addition, the OMP states that signage will be posted at all entrances to cyanide facilities informing of other prohibitive activities such as smoking, eating, and drinking, and that the reagent tanks in Reagent Building 2 will have signage indicating them as bulk sodium cyanide storage containers.

SGP SOPs require that the operator verify the liquid cyanide is pink/red. The checklist that accompanies the SOPs also requires that the operator verify that the cyanide solution in the mix tank transfer is pink/red. Plans also state that pipes, lines, and tanks containing cyanide are to be labeled with their contents and direction of flow.

As the facility has not yet been constructed, there have been no cyanide exposure incidents or incident investigations. The requirement to fully investigate cyanide exposure or spill incidents is described in SGP Plans and is shown as a responsibility of the Site Safety and Health Officer. The OMP also identifies a requirement to review and update the OMP following cyanide incidents (exposures and/or spills and releases) potentially triggering Management of Change procedures and reviews of the cyanidation facility design criteria.

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
☐ not in compliance with

Standard of Practice 6.3

Summarize the Basis for this Finding or Deficiencies Identified:

Resources for responding to cyanide emergencies are outlined in Cyanide Emergency & Spill Response Plan (CESRP) and SOPs, including medical supplies, antidotes, resuscitators, and emergency communication systems. The CESRP states that a final decision on the site specific medical aids and selected antidotes will be based on a Medical Review Officer recommendation, so the list of required medical supplies will be finalized once the selection has been made. The Process Area Cyanide Mixing and Offload SOP makes reference to inspecting emergency response equipment requirements in the procedure checklist. In addition, Inspection SOPs include the inspection of safety and emergency response items in all area checklists. Responsibility for verifying the availability of appropriate equipment and medical supplies is assigned to the Emergency Response Team (ERT). The specific requirements and locations of emergency supplies have not yet been determined but would be expected to established upon completion of the facility design.

The CESRP provides written emergency response plans for cyanide exposures including adsorption, inhalation and ingestion exposures. Exposure response procedures include decontamination, administration of oxygen, and provision of medical aid and/or an antidote. The written plans include recognition of the symptoms of exposure, and implementing the SGP Emergency Notifications process provided in the CESRP. The roles and responsibilities for emergency response are described, and specifically include responsibilities for cyanide exposure response assigned to the Emergency Response Coordinator and the Emergency Response Team, with support from other positions. In the Emergency Notifications process, Site Security will undertake notifications of site ERT and appropriate offsite medical support and transport services. Personnel transport to off-site medical facilities is also described. These procedures include escorting of the worker, contact information for a paramedic ambulance service, air ambulance service provider, and the Cascade Medical Center and St. Alphonsus Regional Medical Centre Boise.

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
☐ not in compliance with

Standard of Practice 7.1

Summarize the Basis for this Finding or Deficiencies Identified:

The facility has developed cyanide-specific emergency response plans and emergency response plans for a broad range of emergencies including spills of cyanide and exposures, avalanches, fires and explosions, vehicle incidents, floods, and other events. The TSF OMS Manual provides plans for various tailings-related emergencies that could result in the release or exposure to cyanide solutions, including overtopping of dams, seepage or piping failures, delivery line ruptures, and extreme precipitation events. The emergency plans include consideration of catastrophic releases of HCN, transportation accidents, releases during unloading and mixing, fires / explosions, pipe /valve / tank ruptures, overtopping or failure of ponds and impoundments, power outages and pump failures, uncontrolled seepage, and cyanide treatment / destruction plant failure. Emergency plans are expected to be updated as design of the cyanidation facilities progresses and when construction is completed.

The emergency plans include consideration of specific response actions to clear personnel from the area of exposure, use of cyanide antidotes and first aid measures, control of releases at their sources, and containment, assessment, mitigation and future prevention of releases. The selection of a suitable antidote, and therefore the means of administering the antidote, are under determination but would be expected to have been completed well prior to operations

As the mine is in the pre-operational stage, a cyanide supplier and transporter has not yet been selected, and route planning and emergency response planning for transportation routes to SGP has not taken place yet. However, SGP has committed to the delivery of cyanide only by transporters that are certified to the ICMC, and will only take possession of the cyanide from these transporters upon receipt at SGP.

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
☐ not in compliance with
Standard of Practice 7.2

Summarize the Basis for this Finding or Deficiencies Identified:

Offsite emergency service providers and medical facilities have been identified in the CESRP and agreements are in place with an emergency evacuation (helicopter) service provider and the Cascade Medical Center and Cascade EMS service provider; however, the current service agreements do not specifically address cyanide-related emergencies. Perpetua and SGP has held extensive community engagement in the course of planning, design, and permitting efforts to date, and it is expected that this level of engagement with stakeholders and the community will be maintained. Cyanide-related consultation with these parties is expected as SGP progresses through the permitting and construction stages. The emergency plans have been updated as site activities change over time, and it is expected that further consultation with these parties will include cyanide-related emergency scenarios once permitting has been completed.

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
☐ not in compliance with
Standard of Practice 7.3

Summarize the Basis for this Finding or Deficiencies Identified:

The emergency plans designate the Process Manager as the primary Emergency Response Coordinator (ERC), and give the ERC the role of Incident Commander for Hazardous Waste Operations and Emergency Response (HAZWOPER) incidents including a hazardous substance release or spill. The Process Manager is also able to designate alternate ERCs as appropriate for the incident. Two designated workers per shift are assigned to an Emergency Response Team, although during decreased site activity any site worker may be considered part of the ERT. Duties and responsibilities of the ERC and ERT members are described in the procedures. Initial and refresher training requirements for the ERT include First Aid, Cyanide Awareness and Response, and HAZWOPER, as well as specialized training in site-specific CESRP procedures including the use of response equipment. A call-out list identifies those who may be expected to be involved in an incident, including internal and external ERT members.

The operations emergency response equipment for cyanide spills are listed in the CESRP, including PPE and supplies for exposures. The locations of the equipment are not specified but it is anticipated that this will be determined once the facility design is completed. The ERT is to conduct monthly inspections of equipment inventories, and operators are to conduct daily area inspections of specific emergency response equipment.

The role of outside responders and medical facilities are described in the CESRP, including the paramedic services (air and ground) and medical centers that would be involved in incident response. Contact information for these groups as well as for the state and federal agencies that may be involved is provided. These groups are not yet fully aware of their potential role in cyanide emergency responses, and have not yet been involved in mock drills or implementation exercises. It is understood that this outreach and confirmation of ability, as well as training and capacity building as necessary, will occur once permitting of the cyanidation facilities has been approved.

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

Summarize the Basis for this Finding or Deficiencies Identified:

The CESRP describes communication requirements in the event of a cyanide incident. Internal notification is to include reporting to the Site Supervisor by telephone or radio, and Site Security if a callout of the ERT is required. External notification may include other responders, and external agencies as appropriate. Procedures for external notifications of medical facilities and transporters are currently in place for site emergencies during the property development activities, and are to be expanded to include cyanide-related emergencies once operations commence. Responsibility for engaging with these resources is assigned to the ERC. The notification of internal and external stakeholders, including regulators, is assigned to the Field Operations Manager. Communications with the media is assigned to the Director, Public Affairs, or their delegate. The Crisis Communications Team and Crisis Communications Plan is also cited in the CESRP. Contact information for these parties is provided, as well as radio and telephone instructions.

Section 3.2 of the CESRP stipulates the conditions and responsibilities for signatories to the Code to report any significant cyanide incidents to the ICMI. The definition of a significant cyanide incident is consistent with that of the Code's Definitions and Acronyms document. As an external agency, the Field Operations Manager would be responsible to notify the IMCI, as per Section 1.5 of the CESRP.

The facility is not yet operational so there have been no cyanide-related incidents to report.

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
☐ not in compliance with

Standard of Practice 7.5

Summarize the Basis for this Finding or Deficiencies Identified:

The CESRP addresses the remediation of spills of solid cyanide briquettes, and of spills of cyanide solutions within and outside of secondary containments. Specific measures are described for the recovery of spilled cyanide solutions and solids, including determining if the material is appropriate for reintroduction to the circuit or should be sent to the TSF. The procedures describe treating soil residuals with hydrated lime and/or caustic soda, and the use of sodium hypochlorite as a neutralizing agent, and requires contaminated materials to be decontaminated and disposed of properly. Sodium hypochlorite and other neutralizers are prohibited from use on spills in surface water or in areas where runoff to surface water may occur. Each of the specific spill response sections provides additional details about residuals and equipment decontamination procedures appropriate for the type of spill described.

The provision of alternate drinking water supplies, if required in the event of a spill or release of cyanide, is not described in the CESRP. However, there are no local communities or neighbors within 45 miles that use water supplies which could be affected by cyanide spills or releases. Once operational, SGP will obtain its potable water from an alluvial groundwater intake located roughly 2.5 miles upgradient from the cyanide facilities.

The expectations and minimum requirements for a Confirmatory Sampling Plan to be developed following a spill cleanup effort are defined in the CESRP. The Confirmatory Sampling Plan is to include a sampling strategy and justification for the sampling plan, methods and locations for the sample location, and other considerations that will confirm the completeness and effectiveness of remedial work following a spill.

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
☐ not in compliance with

Standard of Practice 7.6

Summarize the Basis for this Finding or Deficiencies Identified:

The CESRP states that the Plan will be reviewed, modified, and updated as appropriate including after cyanide incidents, after mock drills, and at least annually. A record of document revisions is maintained and it shows two revisions having occurred to date, as a result of addressing regulatory agency reviews. Additional reviews may be expected once the facility becomes operational.

The CESRP requires that emergency response drills and a full evacuation be held at least annually. SGP currently holds mock drills for emergency scenarios that have included the participation of external agencies such as hazardous materials incidents drills with the local fire departments. Given the pre-operational status of the SGP, it is appropriate that no mock cyanide emergency drills have yet taken place. SGP stated that they intend to follow the guidance of the Code with regard to scenario selection, personnel and agency involvement, and continual improvement processes when designing and implementing these expanded drills.

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

Summarize the Basis for this Finding or Deficiencies Identified:

SGP has not yet been constructed and neither cyanide nor workers who may encounter cyanide are present on the site. However, an education and training plan has been developed in anticipation of full operations and includes a requirement for Cyanide Area Inductions and for Cyanide Awareness and Hazard Recognition (Initial and Refresher) applicable to all on-site personnel, with the sole exception of external emergency response personnel who only receive the area induction training. The Cyanide Hazard Awareness Training program outline includes recognition of cyanide materials at the operation, information regarding the health effects, symptoms of cyanide exposure, and procedures to follow in the event of an exposure. It is expected that this training program will be implemented upon hiring of the workers who may encounter cyanide as operations commence.

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

Summarize the Basis for this Finding or Deficiencies Identified:

SGP has not yet been constructed and training of workers in production tasks has not yet been conducted. However, education and training programs have been developed in anticipation of full operations, and describe Cyanide Equipment User Training (Task Training) for workers who will be involved in unloading, sampling, mixing, and storage of cyanide, ore processing, processing maintenance, and inspections/audits. This training will include all relevant Process Operation and Maintenance Procedures and Tailings Procedures. Training is required before being allowed to work in an unsupervised manner, and refresher task training is required periodically. It is expected that this training program will be implemented upon hiring of the workers who require task training as operations commence.

The Safety and Training Manager, or their competent and qualified designee, will provide the cyanide related safety training and guidance, in conjunction with the Process Manager. The Employee Education Program (EEP) also assigns a supporting role in the cyanide-related training to the Environmental Manager, and defines Competent and Qualified Person for the purposes of training.

Refresher training intervals are defined in the EEP for Cyanide Awareness training (annually) and for Task Training (as needed). For task training, the need for refresher training may be determined through other means including field signoffs and performance reviews. Evaluation of cyanide training programs will be conducted through interviews, testing, and observation. Training programs will be reviewed and modified as appropriate after cyanide incidents, mock drills, and at a minimum annually. Training records for task training (initial and refresher) will be maintained in an electronic database and hard copy files will be kept onsite. Electronic records will be maintained by expansion of the existing site training records database, which records worker name, trainer name, course/content, completion date and results, and required refresher date, as well as electronic linkages to course record documentation such as tests or attendance sign-offs.

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

Summarize the Basis for this Finding or Deficiencies Identified:

Training elements for each job cover all relevant Process Operation and Maintenance Procedures and Tailings Procedures, which stipulate to follow emergency procedures in the event of cyanide incidents. Cyanide Release Training (initial and refresher) is provided for all process and maintenance personnel, and for non-ERT personnel. The EEP also states that Cyanide Release Training for process personnel involved with cyanide unloading and mixing includes worker decontamination and first aid procedures following releases. Training of the ERC and of ERT members is described in the CESRP and includes full HAZWOPER training for any employee who may be assigned chemical clean up duties. The training includes emergency response procedures as well as the use of equipment (e.g.: Self-contained breathing apparatus, HCN Gas Detection, spill kits). Refresher training requirements have been defined, and include monthly training for ERT members, with annual and as-needed refresher training for process personnel.

External parties and emergency responders have been identified, but their role in cyanide-related emergencies has not yet been fully determined. It is expected that training and communications program with external agencies and service providers will be implemented as operations commence.

Training records, including assessments of effectiveness, will be maintained in an electronic database and hard copy files will be kept onsite. Electronic records will be maintained by expansion of the existing site training records database, which records worker name, trainer name, course/content, completion date and results, and required refresher date, as well as electronic linkages to course record documentation such as tests or attendance sign-offs.

It is expected that this training program will be implemented upon hiring of the workers who require training as operations commence.

PRINCIPLE 9 – DIALOGUE & 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
☐ not in compliance with

Standard of Practice 9.1

Summarize the Basis for this Finding or Deficiencies Identified:

The SGP has provided numerous opportunities for stakeholder involvement, has provided a broad range of stakeholders with information regarding the intended use of cyanide, and has responded to concerns and questions from stakeholders with regard to the use of cyanide and the risks posed by the presence of cyanide at the site. Part 4 of the 2025 Final Record of Decision for the SGP describes a public involvement process undertaken by Perpetua (Midas Gold at the time) that began with scoping tasks and publishing a Notice of Intent in 2017. The scoping work was based on activities described in the SGP Plan of Restoration and Operations dated September 2016, which included several mentions of the use of cyanide as a reagent in the process and committed to complying with the ICMC. The public involvement process included several open houses in local communities, and recording of all queries submitted by public comment forms, emails and letters received from the public. Comments received from stakeholders in the public involvement process dealt with the transport, use, and end fate of cyanide among many other issues; a total of 536 such submissions were received. In addition, in 2020 a Draft Environmental Impact Statement (DEIS) was released for public review and input over a 75 day comment period, during which over 10,000 comment letters were received. A Supplemental DEIS was published in 2022, and a total of approximately 19,400 submissions were received in response. The use and management of cyanide was described in the DEIS and many comments dealt with cyanide related issues. Responses were provided to all substantive comments received in these processes.

According to it's 2024 Annual Report, the Stibnite Advisory Council (SAC) was set up in 2017 to provide key information to the communities and to seek information from Perpetua with regard to the SGP. The SAC has published a Frequently Asked Question (FAQ) document for the SGP that references cyanide numerous times, including a detailed description of the tank leaching process, the safety of the use of cyanide, cyanide transportation to the site, commitment to certification to the ICMC, cyanide discharges to the TSF, and post-closure cyanide in the TSF. The SAC remains in place currently and it's reports are made available on it's website.

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

Summarize the Basis for this Finding or Deficiencies Identified:

Details regarding the use of cyanide and the management of cyanide at SGP are provided to the public and stakeholders through the SAC. The FAQ provided by the SAC (provides a detailed written description of the leaching process and the use of cyanide in this process. The FAQs also deal with the management of cyanide from transportation through to the TSF and destruction processes. The FAQ is available at https://stibniteadvisorycouncil.com.

The vast majority of the population The State of Idaho is literate. However, Perpetua has also made information on the use of cyanide available verbally in the series of public open houses described in the Final Record of Decision, and in other SAC meetings and forum.

Responsibilities to report incident-related information to external stakeholders are described in the CESRP, and lie with the Director, Public Affairs, the Crisis Communications Team, and the Field Operations Manager. SGP currently reports environmental or safety incidents to the National Response Center, the Idaho Department of Environmental Quality, National Forest, and other public or external agencies as appropriate. As required under federal Mining Safety and Health Administration legislation, information regarding all releases is to be made publicly available. The facility is not yet operational so there is no information regarding cyanide-related incidents to make available.