INTERNATIONAL CYANIDE MANAGEMENT CODE AUDIT
MARIGOLD MINE, NEVADA
SUMMARY AUDIT REPORT

Submitted to:

International Cyanide Management Institute
1200 G Street NW, Suite 1800
Washington DC, 20005

Glamis Marigold Mining Company
5190 Neil Road Suite 310
Reno, Nevada 89502

Submitted by:

Golder Associates Inc.
44 Union Boulevard, Suite 300
Lakewood, Colorado 80228

December 20, 2006 063-2129
Name of Project: Marigold Mine

Project Owner / Operator: Marigold Mine is operated by Glamis Marigold Mining Company, a Joint Venture between Glamis Marigold Mining Company (66.7%) and Barrick Gold Corporation (33.3%).

Name of Responsible Manager: Timothy M. Janke, Vice President and General Manager

Address and Contact Information:

Marigold Mine
PO Box 160
Valmy, Nevada 89438

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Email – Tim.Janke@goldcorp.com

Audit Dates: November 6-8, 2006

Location and Description of Process

Glamis Marigold Mining Company operates the Marigold Mine (Marigold) located approximately three miles south of Valmy in the southeastern portion of Humboldt County, Nevada. Marigold’s land position encompasses approximately 19,000 acres of private and public land. The mine has been in commercial operation since 1988.

Marigold consists of eleven open pits, eight waste rock stockpiles, four gold cyanide heap leach facilities including process solution ponds and carbon columns, a closed and reclaimed tailings impoundment, process and office buildings, water supply wells, access and haul roads, and storm water controls structures. The Marigold operation employs approximately 175 people and operates year round, 24 hours per day. The heap leach pads are constructed on engineered foundations with HDPE liners for containment of solution. Dilute cyanide solutions are applied to the run-of-mine heaps and collected on the liner and within solution collection pipes for conveyance to pregnant solution ponds. The process ponds are enclosed in fencing to prevent wildlife and livestock access and the pond surfaces are netted or covered with bird balls to prevent bird access. Pregnant solution is conveyed to carbon columns for gold adsorption. Loaded carbon is removed from the columns for transport to the process building. The carbon is then stripped using a hot pressure alkaline solution. Gold is recovered from the hot alkaline solution using electrowinning. After the gold is collected in the electrowinning process it is dried in a retort. The dried material is placed in an induction furnace with fluxes and the final product, dore’, is produced. All cyanide
storage and handling is completed within concrete containments by trained operators. The Marigold Mine has routine shift inspections to evaluate the performance of cyanide facilities to ensure containment and compliance. Environmental and wildlife monitoring associated with the cyanide facilities is conducted and reported to Nevada agencies.

Cyanide is delivered to the site in specially engineered tanker trucks as liquid Sodium Cyanide. The liquid cyanide is offloaded into steel storage tanks using compressed air at low pressures. The high strength cyanide solution is conveyed from the storage tanks in pipelines for mixing and dilution in the process solution ponds.

☑ in full compliance with

The operation is ☐ in substantial compliance with International Cyanide Management Code

☐ not in compliance with

Audit Company: Golder Associates Inc.

Audit Team Leader: Scott H. Miller

E-mail: Scott_Miller@golder.com

Names and Signatures of Other Auditors:

Pamela J. Stella

Pamela J. Stella

Name of Auditor

Signature of Auditor

December 20, 2006

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

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Gold Mine Operations and using standard and accepted practices for health, safety, and environmental audits.
1. PRODUCTION: Encourage responsible cyanide manufacturing by purchasing from manufacturers who 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.

- [x] in full compliance with

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<th>Standard of Practice 1.1</th>
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**Basis for Audit Finding:** Marigold has committed to only purchase cyanide from producers that are compliant with the International Cyanide Management Code (ICMC). Marigold has Sodium Cyanide supply contracts with both Cyanco and E.I. DuPont De Nemours & Co., Inc. (DuPont). Both Cyanco and DuPont are signatory to the ICMC and have provided third-party independent Audit Summary Reports confirming full compliance with the ICMC’s Cyanide Production Principles and Standards of Practice.

2. TRANSPORTATION: Protect communities and the environment during cyanide transport.

*Standard of Practice 2.1:* Establish clear lines of responsibility for safety, security, release prevention, training and emergency response in written agreements with producers, distributors and transporters.

- [x] in full compliance with

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<th>Standard of Practice 2.1</th>
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**Basis for Audit Finding:** Marigold has Sodium Cyanide supply contracts with Cyanco and DuPont, which specify that the operation takes ownership of the cyanide at the time of delivery, but does not define responsibility of ICMC Transportation Principles and Standards of Practice. Cyanco and DuPont by contract are solely responsible for the production and transport of Sodium Cyanide to the delivery point at Marigold. Cyanco is a signatory producer to the ICMC and subcontracts TransWood Inc. for transportation of the cyanide to Marigold. Likewise, DuPont is a signatory producer to the ICMC and subcontracts Sentinel Transportation LLC (Sentinel) for transportation within Nevada. Both TransWood and Sentinel have been certified by third party independent auditors as compliant with the ICMC with clear lines of responsibility for safety, security, release prevention, training, and emergency response. DuPont has not yet certified the entire transportation supply chain as compliant with ICMC. Consequently, Cyanco is currently the only vendor approved by Marigold to provide Sodium Cyanide.
**Standard of Practice 2.2:** Require that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management.

- [x] in full compliance with
- [ ] in substantial compliance with
- [ ] not in compliance with

**Basis for Audit Finding:** Cyanco and DuPont by contract are solely responsible for the production and transport of cyanide to the delivery point at Marigold. Cyanco is a signatory producer to the ICMC and subcontracts TransWood Inc. for transportation of the cyanide to Marigold. Likewise, DuPont is a signatory producer to the ICMC and subcontracts Sentinel Transportation LLC (Sentinel) for transportation. Both TransWood and Sentinel have been certified by third party independent auditors as compliant with the ICMC with appropriate emergency response plans and capabilities and have adequate cyanide management control measures. DuPont has not yet certified the entire transportation supply chain as compliant with ICMC. Consequently, Cyanco is currently the only vendor approved by Marigold to provide Sodium Cyanide.

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.

- [x] in full compliance with
- [ ] in substantial compliance with
- [ ] not in compliance with

**Basis for Audit Finding:** The design and construction of the cyanide unload and storage facilities have been completed appropriately as documented in construct as-built reports prepared and stamped by Nevada Professional Engineers. The cyanide unload and storage facility quality control and assurance procedures and documentation include as an-as-built report noting foundation compaction and concrete reinforcement and verification of piping and tankage materials. In addition these facilities have been recently reviewed and approved for continued use by a Nevada registered Professional Engineer. The liquid cyanide storage tanks each have a high-level alarm and level indicator. The cyanide unloading and storage tanks are located outside and provide appropriate ventilation. The cyanide unloading and storage areas are within concrete containment to contain releases and precipitation that may contact cyanide. As also covered under Standard of Practice 4.7, the containment areas are constructed for spill prevention and the containments sized to contain volumes greater than the single largest tank. Fenced security is provided around the mine site with additional fencing around the carbon column and process ponds. The delivery of liquid cyanide is performed in specially engineered tanker trucks.
**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.

- [x] in full compliance with

The operation is

- [ ] in substantial compliance with **Standard of Practice 3.2**
- [ ] not in compliance with

**Basis for Audit Finding:** Marigold has developed Standard Operating Procedures (SOPs) to prevent exposure and releases of cyanide during unloading, storage, and application. The SOPs consist of “Cyanide Safety”, “Escorting and Monitoring the Offloading of Cyanide Deliveries”, “Monthly Inspection (Cyanide)”, “Process Facilities Preventive Maintenance”, “Process Maintenance Decontamination Procedures” and “Heap Leach Operators”. Marigold uses inspection checklists and follows a preventative maintenance program. As also covered under Standard of Practice 4.1, Marigold has implemented an inspection program that includes daily pre-shift walk around and formal monthly inspections that are entered into corrective action inspection forms and completion of tasks documented.

**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 utilizing contingency planning and inspection and preventive maintenance procedures.

- [x] in full compliance with

The operation is

- [ ] in substantial compliance with **Standard of Practice 4.1**
- [ ] not in compliance with

**Basis for Audit Finding:** Marigold has developed and implemented operator task-specific SOPs that address protection of human health and the environment for the operation of cyanide heap leach processing. These SOPs were found to have adequate contingency planning, routine inspections, and a preventive maintenance program. SOPs address all the cyanide management tasks such as unloading, mixing and storage of cyanide; operation of the carbon-in-column systems; and cyanide circulation pumps. Contingency planning documents have been developed and implemented to support the process pond management and solution inventory to address power failure, and extreme rainfall management. Marigold has a backup generator to ensure that essential process equipment and systems operate and Marigold has inspections that include regular testing of the backup power generator. Marigold uses inspection forms for identifying, completing and documenting all preventive maintenance activities.
**Standard of Practice 4.2:** Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

- [x] in full compliance with

**The operation is**

- [ ] in substantial compliance with Standard of Practice 4.2
- [ ] not in compliance with

**Basis for Audit Finding:** Marigold is a heap leach operation and the mill tailings impoundment is now closed.

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

- [x] in full compliance with

**The operation is**

- [ ] in substantial compliance with Standard of Practice 4.3
- [ ] not in compliance with

**Basis for Audit Finding:** Marigold has developed a comprehensive, probabilistic water balance that meets the requirements of a comprehensive water management program. Process facility inspection procedures and data collection programs have been implemented to update the water balance model. Marigold has a weather station and measures and records precipitation data for incorporation into the model and operational planning. Daily shift inspections will include available freeboard level monitoring that are incorporated into the water balance model and operational planning to prevent potential overtopping.

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

- [x] in full compliance with

**The operation is**

- [ ] in substantial compliance with Standard of Practice 4.4
- [ ] not in compliance with

**Basis for Audit Finding:** Marigold has five process ponds that contain cyanide solutions. Marigold’s facilities include a perimeter fence around the entire property and wildlife fencing around the barren and pregnant ponds to further prevent wildlife and livestock access. Marigold has netting covering the two barren solution ponds, two pregnant solution ponds, and bird balls in a new pregnant pond to protect birds. Marigold has developed and implemented programs to prevent and control ponding of solution on the surface of the heaps during application and to prevent overspraying of the lined areas.
Standard of Practice 4.5: Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

- in full compliance with

The operation is
- in substantial compliance with Standard of Practice 4.5
- not in compliance with

Basis for Audit Finding: Marigold is designed and operated for zero-discharge of process fluids. Operation performance history, design criteria and the project water balance indicate that facilities operation is consistent with the zero-discharge requirements. Monitoring information indicates no impact to groundwater or surface water quality has occurred from the heap leach operations. Spill prevention and emergency response plans have been developed to comply with the zero-discharge operating requirements.

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

- in full compliance with

The operation is
- in substantial compliance with Standard of Practice 4.6
- not in compliance with

Basis for Audit Finding: The regional groundwater beneficial use has been classified as drinking water source. Accordingly, the project construction and operation include a number of seepage control technologies composite liner systems below the heap leach pads consisting of compacted low-permeability soil liner overlain by geomembrane liners, double geomembrane liners with leak detection and leak collection systems underneath the process ponds, and concrete containments in process areas to protect the beneficial water use. The groundwater quality monitoring data indicate that the beneficial groundwater uses have been protected.

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

- in full compliance with

The operation is
- in substantial compliance with Standard of Practice 4.7
- not in compliance with

Basis for Audit Finding: The Marigold operation has secondary curbed concrete containments for all cyanide storage and processing areas. Other secondary containments include pipe-in-pipe and geomembrane-lined channels. The secondary containments in the cyanide unload and storage areas have been designed to contain at least 110% of the largest tank leakage and a design storm event. Secondary containment in the process area
has SOPs for management of tank leakage that involves solution pumping, and protocols for solution transfer. SOPs have been developed to address management of spill response and clean-up within the containments. Review of the operation indicates that all tanks, piping and containments are constructed of materials appropriate for handling high pH cyanide solutions.

**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.

☑ in full compliance with

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

**Basis for Audit Finding:** The project construction has been verified by qualified engineering companies and includes detailed quality assurance/quality control (QA/QC) data collection and documentation. The QA/QC documents indicate that the construction was completed according to engineering standards and specifications. Marigold has committed to retain all QA/QC information in the Environmental Office.

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

☑ in full compliance with

The operation is ☐ in substantial compliance with ☐ not in compliance with **Standard of Practice 4.9**

**Basis for Audit Finding:** Marigold has environmental monitoring programs developed to evaluate the performance of the cyanide management systems on wildlife, surface and ground water quality. The environmental programs have been reviewed and approved by qualified professionals and implemented by qualified personnel and include all appropriate sampling and analysis documentation.

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

**Standard of Practice 5.1:** Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.
The operation is  in full compliance with  Standard of Practice 5.1

Basis for Audit Finding: Marigold has developed a written closure plan and cost estimate to address Nevada State and federal mining reclamation requirements that includes decommissioning of all cyanide equipment, pipelines and facilities. Marigold has developed an implementation schedule that considers the treatment and evaporation of all process solution, detoxification and rinsing of equipment, and removal and decommissioning of ponds and other containments. Marigold is required to update the closure plan and estimated costs at least every year with the Bureau of Land Management and every three years with their Nevada permit water pollution control permit and with every project change. The closure and reclamation plan includes an implementation schedule and performance monitoring.

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

The operation is  in full compliance with  Standard of Practice 5.2

Basis for Audit Finding: Marigold has developed cost estimates with sufficient financial resources for the closure of the cyanide-related facilities and activities. Marigold has established an approved financial surety to cover the full cost of cyanide facility decommissioning. The U.S. Department of Interior, Bureau of Land Management holds a financial surety from Marigold for approximately $32 million.

6. WORKER SAFETY: Protect workers’ health and safety from exposure to cyanide.

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

The operation is  in full compliance with  Standard of Practice 6.1

Basis for Audit Finding: Marigold has identified potential cyanide exposure scenarios and developed procedures and plans to eliminate, reduce and control exposure. Marigold’s individual task specific SOPs provide details for safe operation of cyanide equipment, personal protective equipment requirements and inspection requirements. Marigold has weekly health and safety meetings to provide information and training to employees as well as solicit input from employees on worker safety issues. Any proposed changes in SOPs are...
discussed with the area supervisors prior to implementation. All changes are communicated to the workforce and training requirements updated.

**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.

- [x] in full compliance with

**The operation is**

- [ ] in substantial compliance with **Standard of Practice 6.2**
- [ ] not in compliance with

**Basis for Audit Finding:** Marigold has developed SOPs for the cyanide usage areas designed to prevent the generation of hydrogen cyanide (HCN) gas in addition to locating key cyanide process facilities outside. Marigold has defined process equipment operational plans for control of cyanide, caustic and pH. Marigold has mobile HCN detectors for use in confined space entry. Marigold has established requirements for personal protective equipment at all relevant process areas and for all activities. Marigold has implemented monitoring equipment maintenance and calibration programs. Marigold has installed safety showers with eye wash stations and non-acidic fire extinguishers at relevant cyanide usage areas. Marigold provides the cyanide safety information (Material Safety Data Sheets and first aid procedures) at all key process locations. Marigold has implemented an accident investigation process to report and investigate all cyanide related incidents.

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

- [x] in full compliance with

**The operation is**

- [ ] in substantial compliance with **Standard of Practice 6.3**
- [ ] not in compliance with

**Basis for Audit Finding:** Marigold has safety equipment including safety showers with eye wash stations, first aid equipment, an emergency response vehicle, and first aid training. Marigold has a first responder team. They are trained to provide first aid for cyanide exposure including oxygen and amyl nitrite. In the event of a worker exposure Marigold will provide on-site first aid and provide a kit with intravenous cyanide antidote for transport with the patient to the local hospital. Marigold has made formal arrangements with the local hospital to treat cyanide exposed workers. Marigold has conducted cyanide exposure drills and tests the relevant emergency procedures at least once per year.

7. **EMERGENCY RESPONSE:** Protect communities and the environment through the development of emergency response strategies and capabilities.

**Standard of Practice 7.1:** Prepare detailed emergency response plans for potential cyanide releases.
The operation is in full compliance with Standard of Practice 7.1

Basis for Audit Finding: Marigold has developed and implemented SOPs dealing with cyanide related emergencies and emergency control management that address potential cyanide releases including containment plans and analysis of potential scenarios. The emergency response plans will be evaluated and updated at least annually.

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

The operation is in full compliance with Standard of Practice 7.2

Basis for Audit Finding: The emergency response plans have been designed to be implemented entirely by trained site personnel. The Marigold emergency response teams are trained to respond to all potential cyanide incidents at the site. Local stakeholders such as the Sheriff’s department and ambulance have participated in on-site emergency response training. Marigold is committed to keep the local emergency planning committee informed of emergency response planning activities. Marigold involves site personnel in mock drills and revises the emergency response as needed.

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

The operation is in full compliance with Standard of Practice 7.3

Basis for Audit Finding: Marigold has committed in the emergency response plan and training SOPs the necessary emergency response equipment and first aid to manage all cyanide incidents at the operation and to coordinate transportation to the nearest medical facilities. Marigold has certified first responders.

The Marigold Emergency Response Plan (ERP) 2006 includes the Marigold Mine Emergency Organization Chart that defines the primary and alternative response coordinators. The ERP has sections on Marigold Mine Personnel Duties and Responsibilities for the Incident Commander and the General Manager Succession. The ERP contains a list of on-site emergency responders and the local off-site responders. Marigold requires training for emergency responders that includes first aid for personnel exposed to cyanide, to administer amyl nitrite, locations of cyanide antidote kits, hazard awareness associated with NaCN and HCN gas, victim and rescuer decontamination.
procedures. The ERP includes radio channel, office and 24-hour cell phone telephone numbers for the Emergency Response Team and Commanders. The ERP has a section describing Marigold Mine Personnel Duties and Responsibilities. The section details the responsibilities of the Incident Commander and the Safety and Environmental Departments. Marigold has several procedures which also detail these responsibilities. Marigold has a list of emergency response equipment for the on-site transportation route. All emergency equipment and supplies are inspected monthly by the Safety Department. The ERP provides detailed contact information and describes the roles of off-site responders.

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<th>Standard of Practice 7.4:</th>
<th>Develop procedures for internal and external emergency notification and reporting.</th>
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The operation is ☐ in substantial compliance with Standard of Practice 7.4 ☐ not in compliance with

**Basis for Audit Finding:** The emergency response plans detail the procedures (including current contact telephone numbers) for internal and external emergency notification and reporting.

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<th>Standard of Practice 7.5:</th>
<th>Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.</th>
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The operation is ☐ in substantial compliance with Standard of Practice 7.5 ☐ not in compliance with

**Basis for Audit Finding:** Marigold has prepared cyanide response and remediation plans that address appropriate uses and situation for cyanide treatment chemicals including ferric sulfate. Marigold has developed plans to sample and monitor soils and groundwater in the event of a cyanide spill.

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<th>Standard of Practice 7.6:</th>
<th>Periodically evaluate response procedures and capabilities and revise them as needed.</th>
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The operation is ☐ in substantial compliance with Standard of Practice 2.2 ☐ not in compliance with

**Basis for Audit Finding:** Marigold has committed to annual evaluation and update of emergency response plans, if needed. Additionally, at least once per year Marigold will conduct a mock cyanide emergency response drill.
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.

☐ in full compliance with

☐ The operation is in substantial compliance with Standard of Practice 8.1

☐ not in compliance with

Basis for Audit Finding: Marigold provides training to all employees on the hazards of cyanide and will provide annual refresher training. Marigold retains all cyanide training records for all employees. The cyanide related SOPs include performance assessment tests that are also retained in the permanent records.

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.

☐ in full compliance with

☐ The operation is in substantial compliance with Standard of Practice 8.2

☐ not in compliance with

Basis for Audit Finding: Marigold has prepared and implemented SOPs that detail health and safety procedures for all aspects of cyanide unloading, handling, mixing and storage. Marigold has job specific training for all cyanide management tasks. Marigold requires MSHA and HAZCOM training, and specific departments receive additional specific training for their work area (carbon columns, strip circuit, acid wash circuit). Marigold’s training program identifies the specific cyanide management elements that each employee must be trained in to perform that specific job properly. Marigold trainers are MSHA and HAZCOM certified and are First Responders. Marigold Safety and Environmental Superintendents are qualified as “Train the Trainer” from Cyanco, an ICMC certified cyanide producer. All new Marigold employees are required to have the ‘Cyanide Safety’ class and pass a written test before working with cyanide. Marigold employees who work in areas that cyanide is used are also trained in MSHA and HAZCOM. All Marigold employees receive annual ‘Cyanide Safety” training. Marigold employees working in specific cyanide management tasks receive annual refresher courses for those tasks. MSHA and HAZCOM are included in the annual refresher training. Marigold requires written tests to evaluate the effectiveness of cyanide training. An employee is also evaluated on an oral quiz and their job performance. Marigold employee training records are retained throughout an individual's employment documenting the training they receive. The records include the names of the employee and the trainer, the date of training; the topics covered, and test results demonstrating an understanding of the training materials.
Standard of Practice 8.3: Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

- in full compliance with

The operation is

- in substantial compliance with
- not in compliance with

Basis for Audit Finding: Marigold has provided training in response to cyanide releases for all production and maintenance personnel and developed a first responder team. Marigold has developed SOPs for cyanide-related tasks. The Emergency Response Plan and SOPs define the response required by operators if a person is exposed to cyanide or if there is an environmental release.

Marigold has an Emergency Response Team comprised of full-time employees trained in first aid and use of resuscitation equipment.

Marigold is committed to at least one annual mock cyanide emergency response drill that will include both human exposure and environmental release. The drill will be analyzed and improvements made to training procedures and the emergency response plan as required.


Standard of Practice 9.1: Provide stakeholders the opportunity to communicate issues of concern.

- in full compliance with

The operation is

- in substantial compliance with
- not in compliance with

Basis for Audit Finding: Marigold provides the opportunity to communicate issues of concern with the public through contact with local stakeholders such as the Sheriff’s office, hospital and ambulance services, and at Local Emergency Planning Commission (LEPC) meetings. Both Barrick and Glamis provide 1-800 telephone numbers for the public to call if they have concerns regarding Marigold. Opportunities for public input were available during the development and review of the environmental impact assessments for the initial start up of the project and for the recent project expansion.

Standard of Practice 9.2: Initiate dialogue describing cyanide management procedures and responsively address identified concerns.

- in full compliance with

The operation is

- in substantial compliance with
- not in compliance with
**Basis for Audit Finding:** Marigold provides the opportunity to communicate issues of concern with the public through contact with the local stakeholders during mock drills and at the Local Emergency Planning Commission (LEPC) meetings.

*Standard of Practice 9.3:* Make appropriate operational and environmental information regarding cyanide available to stakeholders.

- [x] in full compliance with

- [ ] in substantial compliance with **Standard of Practice 9.3**

- [ ] Not in compliance with

**Basis for Audit Finding:** Marigold provides quarterly reports to the Nevada Division of Environmental Protection (NDEP) Bureau of Mining Regulation and Reclamation that includes a summary of cyanide spills and releases, and environmental performance monitoring. These reports are available to the public by request. Marigold is required to complete MSHA reports that would include any cyanide related worker exposure or death. Barrick, Marigold’s joint venture partner, provides operational and environmental information for the Marigold operation in Barrick’s corporate responsibility report and on Barrick’s website ([www.barrick.com](http://www.barrick.com)). The website has an environmental record for spill management and includes Marigold.