

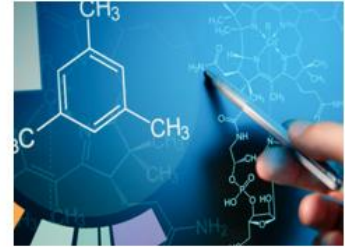
# ICMI Cyanide Code Gold Mining

Summary Audit Report

## Kinross Gold Corporation Bald Mountain Mine

2020 Re-Certification Audit

KINROSS



Submitted to:

The International Cyanide Management Institute  
1400 I Street, NW – Suite 550  
Washington, DC 20005  
USA

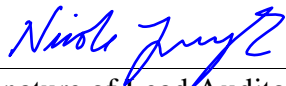
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Signature of Lead Auditor

Date

## Company Names and Contact Information:

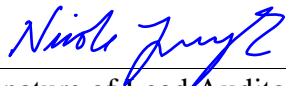
<b>Name of Mine and Location:</b>	Bald Mountain Mine Elko, Nevada – USA
<b>Name of Mine Owner:</b>	Kinross Gold Corporation
<b>Name of Mine Operator:</b>	KG Mining (Bald Mountain) Inc.
<b>Name of Responsible Manager:</b>	Adriano Sobreira KG Mining (Bald Mountain) Inc. P.O. Box 2706 Email: <a href="mailto:Adriano.Sobreira@kinross.com">Adriano . Sobreira@kinross.com</a>

## Location Detail and Description of Operation:

The Kinross Gold Corporation acquired the Bald Mountain Mine from Barrick Gold Corporation in January 2016. The mine is located approximately 73 miles or 117 kilometers south of Elko, Nevada. The mine is an open pit, run-of-mine heap leach operation that began production in 1986. The operation is a conventional open pit mine with a capacity of over 200 tons per day. The site operates 24-hours per day, 7-days per week.

The heap leach operations are divided into three areas: Bald, Mooney (North, South and Deep South), and Vantage. Vantage is the newest of the areas and became operational during the re-certification period. The carbon-in-column (CIC) processing plants include: Process Plant 2, Mooney North Plant, Mooney South Plant, and the Vantage Plant. The Vantage Plant utilizes an innovative vertical CIC process. All operations noted here are within the North Operations Area (NOA) except for the Vantage Complex which is in the South Operations Area (SOA).

Kinross Gold Bald Mountain Mine

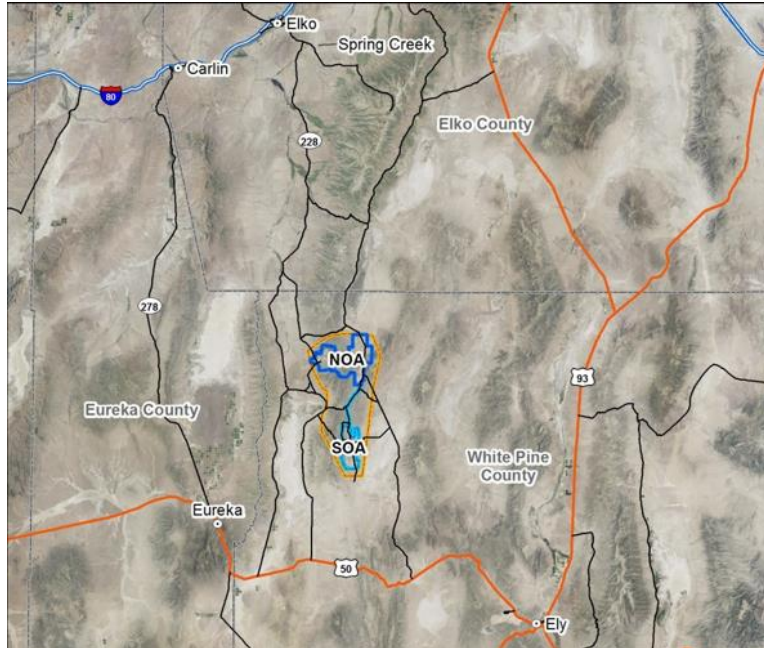


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NOA = North Area Operations (10,782 acres)

SOA = South Area Operations (3,560 acres)

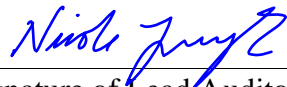
The Bald Mountain Mine Area includes:

- Process Area #1 which is no longer in operation. This consisted of a leach pad, five process ponds and a process building. The facilities have been decommissioned and the ponds backfilled. The area is currently under reclamation.
- Process Area #2 includes leach pads (Bald Leach Pad (previously pads 2 through 4) and Leach Pad 5), Pregnant Sump (PS1), Overflow Pond (POF1) and Secondary Pond (P4), two pregnant solution ponds (P5 and P6), Barren Pond (P7), Carbon-in-Column (CIC) process plant and cyanide offloading facility. However, the leach pads are not being actively leached; cyanide has not been added to the leach pads in over 12 months. The leach pads continue to drain down and the CIC process is still operational.

The Mooney Basin Area includes three process areas:

- North Area Facility, comprising a leach pad (Original Pad and Expansion Pads I, II, and III), two process solution ponds, a storm/event pond, Carbon-in-Column (CIC) process plant and cyanide off-loading facility;
- South Area Facility, comprising Leach Pad 4, a process solution pond, a storm/event pond, a solution collection tank, CIC plant and cyanide off-loading facility.

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- Deep South Area Facility, comprising Leach Pads 5 and 6, a process solution pond, one storm/event pond, and a solution collection tank. Pregnant solution from this facility is piped to the South Area CIC plant for processing.

Originally, the Mooney North and Mooney South Area facilities operated independently. Pregnant and barren solution lines were constructed that connected these facilities, allowing solution to be pumped between them as needed.

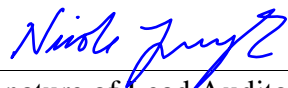
The construction of the Vantage Complex began in Quarter 1 2018. The Vantage Complex is in the South Operations Area, was commissioned in 2019, and consists of:

- A leach pad, a solution collection tank, a process solution pond, a storm/event pond, CIC process plant, two cyanide storage tanks, and a cyanide off-loading area.

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## Auditor's Finding

This operation is in FULL COMPLIANCE with the International Cyanide Management Code.

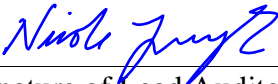
During the re-certification period, the Kinross Gold Corporation Bald Mountain Mine (KG-BM) has not experienced any compliance issues, significant cyanide spills, or human cyanide exposures during the re-certification period.

Audit Company:	MSS Code Certification Service, a Division of: Management System Solutions, Inc. <a href="http://www.mss-team.com">www.mss-team.com</a>
Lead Auditor:	Nicole Jurczyk E-mail: <a href="mailto:njurczyk@mss-team.com">njurczyk@mss-team.com</a>
Mining Technical Auditor:	Gina Rau
Date(s) of Audit:	July 20-23, 2020

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 Code Mining Operations Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

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## Summary Audit Report

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.

The operation is:  in full compliance

in substantial compliance

not in compliance ...with Standard of Practice 1.1

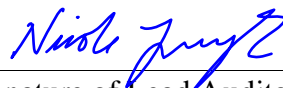
### *Discuss the basis for the Finding Identified:*

The Kinross Gold Corporation Bald Mountain Mine (KG-BM) is in FULL COMPLIANCE with Standard Practice 1.1 requiring the purchase of 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.

Kinross purchases sodium cyanide solution for KG-BM from the Cyanco Company, LLC. The master purchasing agreement was reviewed and is valid for the "Life of Mine".

The master purchasing agreement requires the sodium cyanide supplier be certified to be in compliance with the Cyanide Code. Cyanco is a Cyanide Code Signatory company with a current and valid certification. All cyanide used by the mine is produced in Cyanco's Winnemucca Code-certified production plant. The most recent recertification audit was done in 2019 with the ICMI posting date of December 19, 2019. No cyanide is purchased from independent distributors.

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

### *Standards of Practice*

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

The operation is:       in full compliance  
                                  in substantial compliance  
                                  not in compliance with Standard of Practice 2.1.

### *Discuss the basis for the Finding Identified:*

The operation is in FULL COMPLIANCE with Standard 2.1, requiring that the operation establish clear lines of responsibility for safety, security, release prevention, training and emergency response in written agreements with producers, and transporters.

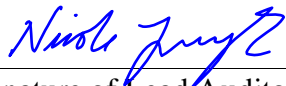
The Kinross-Cyanco purchasing agreement is an agreement that provides all cyanide for the life of the mine to KG-BM. The written agreement addresses all relevant ICMI transportation and emergency response requirements other than the provision of colorant dye. Cyanco sent Kinross a letter in 2019 stating that all cyanide solution shipped starting April 15, 2019 would have dye in it, in compliance with ICMI requirements. Confirmation was made during the audit that dye is in the 30% sodium cyanide solution.

There is no storage of the product prior to shipment from the Winnemucca facility or interim storage along the supply route to the mine. In addition to the written agreements, KG-BM maintains up-to-date emergency response plans from its supplier and the transporter. Cyanco ensures that all Code requirements are met by using exclusively Code-certified transporters.

There are no sub-contractors used by the producer, distributor, transporter, or operation for transportation-related activities. All entities involved in this supply chain from the production, to the packaging, to the transportation, to the unloading are under the direct control of either Cyanco or Kinross and have been audited and certified to the ICMI Cyanide Code.

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2.2 Require that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management.

- The operation is:       in full compliance  
                                  in substantial compliance  
                                  not in compliance with Standard of Practice 2.2.

*Discuss the basis for the Finding Identified:*

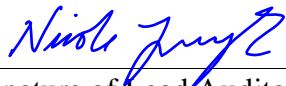
The operation is in FULL COMPLIANCE with Standard Practice 2.2 requiring that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management.

The Cyanco supply agreement reviewed during the audit requires that transporters be a Cyanide Code signatory company. The supply agreement identifies the transporter as TransWood (a certified Signatory company) and stipulates that any other replacement company would also need to be Cyanide Code certified.

The sodium cyanide solution is produced in Winnemucca, Nevada and is transported directly to the mine via truck. Cyanco and TransWood have maintained their Code certifications since 2006. Bills of Lading (BOL) and other shipping papers from the recertification period were reviewed and were found to be complete and compliant.

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### 3. HANDLING AND STORAGE Protect workers and the environment during cyanide handling and storage.

#### *Standards of Practice*

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

The operation is:       in full compliance  
                                   in substantial compliance  
                                   not in compliance with Standard of Practice 3.1.

#### *Discuss the basis for this Finding Identified:*

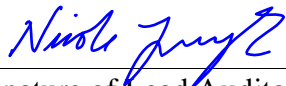
The operation is in FULL COMPLIANCE with Standard Practice 3.1 requiring the design and construction of cyanide unloading and storage facilities consistent with sound, accepted engineering practices and quality control and quality assurance procedures, spill prevention and spill containment measures.

KG-BM facilities for unloading, storing and working with cyanide solution have been designed and constructed in accordance with sound and accepted engineering practices. KG-BM does not receive cyanide in solid form. A Record of Construction Report was available for review during the audit for each heap leach pad construction and expansion project.

The project construction records include a summary of the test results and procedures used to monitor construction activities, to assess the quality of work, and to demonstrate substantial conformance with the approved construction drawings and technical specifications. All reports were stamped by a Professional Engineer. Specifically, the Record of Construction Report for the Vantage Complex Project construction during the recertification period was reviewed and stated that the projects were “constructed in substantial conformance with the approved Construction Drawings and Technical Specifications”.

Surface water is not present on the KG-BM site. To minimize human exposure during cyanide unloading, KG-BM has created 'red zones' in the unloading area. The red zones are identified by red lines painted on the concrete floors or pads. During cyanide unloading, physical barriers are erected to prevent people from entering the red zone during unloading.

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The entire process area, including the cyanide offload areas and tanks, is contained within a reinforced concrete pad surrounded by secondary containment, providing a competent barrier to seepage. The unloading areas in all four process plants are constructed of concrete that was found to be in good condition during the audit. The unloading areas were all found to be appropriate for the activity and protective of the environment. The unloading areas all slope towards a sump, grating that leads to a sump, secondary cyanide containment, or a lined process solution pond. The cyanide storage tanks at Process 2, Mooney South and North, and Vantage are located on concrete pads.

The mine uses level indicators, high-level alarms, and procedural controls to ensure that the cyanide storage tanks do not overflow. Additionally, if a high-level alarm is triggered, an orange strobe light is illuminated in the unloading area where the driver can see it. Operators test the operation of the high-level alarms regularly. Routine calibrations and inspections of the monitoring and alarm equipment are performed. Inspection and calibration records for monitoring equipment were sampled during the audit and were found to be complete.

Adequate ventilation to prevent the build-up of hydrogen cyanide gas was noted throughout the audit. Equipment is either located outdoors or the site utilizes overhead doors, ventilation fans, or ventilation pipes for indoor equipment.

The cyanide storage tanks at KG-BM are in areas where public access is prohibited. Continuously manned security gates, locked gates, and badge-access are methods used to control access to the facility and cyanide storage areas.

KG-BM does not use incompatible materials in their processes nor are such materials stored in process buildings.

### 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.

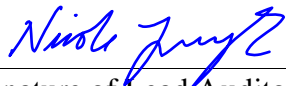
- The operation is:
- in full compliance
  - in substantial compliance
  - not in compliance with Standard of Practice 3.2.

*Discuss the basis for this Finding Identified:*

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The operation is in FULL COMPLIANCE with Standard Practice 3.2 requiring that unloading and storage facilities use inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

KG-BM only receives cyanide solution in tanker trucks. The transporter (TransWood) driver offloads the cyanide from the tanker trucks into KG-BM cyanide storage tanks and then returns the truck to the cyanide supplier (Cyanco). The tanker trucks are not left at KG-BM and KG-BM cannot reuse the tanker trucks for any other purpose. The drivers close all valves on the tanker trucks and the receiving valve on the unloading line that leads to the cyanide storage tanks.

KG-BM has developed extensive plans and procedures to prevent exposures and releases during cyanide unloading, storage and use activities. Standard Operating Procedures describe the manual opening and closing of valves for unloading cyanide from the tanker trucks. Cyanide Delivery checklists ensure the unloading area is inspected prior to truck arrival, appropriate PPE is used during unloading, trailer wheels are chocked for unloading, and spills that may occur during unloading are washed down adequately. KG-BM personnel observe the unloading process from outside the red zone or remotely.

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

##### *Standards of Practice*

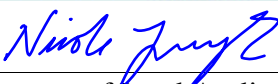
4.1 Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures.

The operation is:      in full compliance  
                                in substantial compliance  
                                not in compliance with Standard of Practice 4.1.

##### *Discuss the basis for the Finding Identified:*

The operation is in FULL COMPLIANCE with Standard Practice 4.1 requiring the implementation of management and operating systems designed to protect human health and

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the environment including contingency planning and inspection and preventive maintenance procedures.

KG-BM has an extensive set of management and policies, procedures, and guidelines for cyanide facilities including unloading, storage facilities, leach plants, heap leach operations, and all cyanide-related services.

The auditors reviewed updated procedures, plans, programs, and instructions for the cyanide facilities, which demonstrate that the operation understands how to manage cyanide in a manner that prevents, and controls releases to the environment and exposures to workers.

Fluid Management Plans for Water Pollution Control Permits (WPCPs) for Process Area #2, the Mooney Area Facilities, and the Vantage Complex were reviewed and were found to be acceptable. The permits specify operating requirements for solution management.

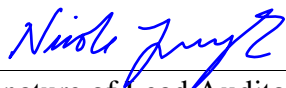
The Fluid Management Plans for the three WPCP permits provide monitoring schedules and freeboard requirements for normal operating conditions. The Plans provide the management procedures for the entire fluid management system at each facility including, as applicable, the heap leach facilities, process plants, reagent storage, and all associated channels, transfer pipes, valves, pumps and tanks used in conveyance, control or detection of process solution between process components. These plans are supplemented by the Standard Operating Procedures (SOPs) that set out inspection requirements for the safe and environmentally sound operation of the facilities.

An extensive database of procedures was available for review during the audit. Procedures were reviewed and were found to be appropriate for the operation and fully implemented. Procedures adequately address all aspects of the facility, including operational control, environmental, health and safety topics, preventive maintenance, water balance, and inspection processes for equipment, secondary containments, environmental media, and wildlife protection. Procedures were available for normal and upset or emergency operating conditions. Operating plans that address the management and operation of the cyanide facilities were sampled during the audit and were found to be complete and acceptable. The new procedures, plans, and permits related to the Vantage Complex were also reviewed during this audit.

The operation has the formal written procedure HS-S-08.01, Management of Change (MOC), to manage changes to the facility. The purpose of the procedure is to ensure that systematic processes are in place to evaluate any changes at the plant so that the risks of incurring negative impacts to people, environmental, property, or product quality are minimized. The written procedure requires written notification to environmental and health and safety personnel and a sign-off before the change can be instituted in the operation. The procedure requires the

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evaluation of technical, operational, safety, environmental, quality, and economical aspects of a proposed change to prevent hasty or unconsidered changes from being implemented.

The most significant change during the recertification period was the startup of the Vantage Complex operation. Multiple examples were available to demonstrate that appropriate approvals had been obtained from the government, engineering, environmental, and safety professionals throughout the project.

The operation has implemented contingency procedures to respond to upsets in water balance, problems identified by inspections, and to address temporary closure of the operation. The three KG-BM Fluid Management Plans contain procedures to address an upset situation in the operation's water balance. The procedures address both "normal operations" and "unusual operations" for each of the process facilities. The Closure Plans for the three operating areas include procedures that would need to be undertaken. These Closure Plans for the three operating areas address situations when temporary closure or cessation of operations may be necessary.

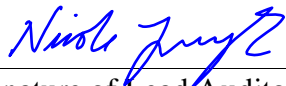
KG-BM maintains a program to inspect cyanide facilities on a frequency that was found to be sufficient to assure that the operation is safe and functioning within design parameters. Workplace Inspections are completed at the beginning of each shift in each one of the four process plants. The inspections require the operator to note those items that need repair, actions to correct, and any additional comments. Shift reports are prepared that document process conditions during the shift and allow the operators to provide comments, note environmental exceptions and remedial actions. Containment inspections are performed on a bi-weekly basis. Complete visual inspections including thickness testing is conducted on an annual basis on the cyanide storage tanks.

Process areas are engineered with storm water diversions, although surface water is not present. Storm water diversions are inspected for integrity quarterly according to the mine Storm Water Pollution Prevention Plan. Records were sampled for the recertification period and were found to be complete. Surface water does not contribute to the Water Balance Model for the mine.

Sodium cyanide unloading, storage, and process area inspections are being conducted. Records were found to be complete and in alignment with Code requirements. Inspections include tank visual and ultrasonic testing; secondary containment inspections; leak detection monitoring; pipeline, pump, and valve inspections; and pond level monitoring. Records were available for all types of inspections reviewed during the audit. Records included the date of inspection, the name of the inspector, and any observed deficiencies. Corrective measures were noted directly on the inspection records in the situations where deficiencies were noted, providing evidence of continuous compliance. The nature and date of corrective actions are also documented along

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with the record of the inspection. The records fulfill Code requirements and are retained for the entire recertification period.

The operation has a documented preventive maintenance (PM) program to ensure that equipment and devices function as necessary for safe cyanide management. The preventive maintenance program is used to perform necessary maintenance and inspect the integrity of process equipment, piping, and tanks. Schedules for daily, weekly, monthly, quarterly, and annual maintenance activities for cyanide facilities are maintained electronically. All personnel showed excellent awareness of cyanide safety topics and the need for proper maintenance of the equipment used in the operation.

Written procedures are used to ensure that any equipment that contains cyanide is properly decontaminated prior to performing maintenance and that maintenance personnel are wearing necessary personal protective equipment. The operation uses J.D. Edwards software to generate maintenance schedules. The operation performs preventive maintenance on pumps, valves, flowmeters, gauges, level sensors, pH meters, sump pumps, filters, and HCN sensors. PM records were reviewed for the recertification period maintenance.

KG-BM has backup generators and allowances for power outages are included in the design capacity of the ponds. Heap leach facilities are also designed to maintain excess capacity. Written procedures are in place for the operation, testing, and inspection of the generators. Generators are checked periodically for fuel level, lighting, heating and are also start tested. This was found to be appropriate by the audit team.

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

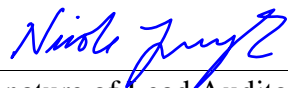
The operation is:       in full compliance  
                                  in substantial compliance  
                                  not in compliance with Standard of Practice 4.2.

*Discuss the basis for this Finding Identified:*

KG-BM only has heap leach operations; therefore, they do not have any milling operations or mill tailings.

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

- The operation is:
- in full compliance
  - in substantial compliance
  - not in compliance ...with Standard of Practice 4.3.

*Discuss the basis for the Finding Identified:*

KG-BM is in FULL COMPLIANCE with Standard Practice 4.3 requiring a comprehensive water management program to protect against unintentional releases.

The Bald Mountain and Mooney operations are addressed in a single water balance model. Based on review of the Bald Mountain Mine North Operations Area Site-Wide Water Balance Model (Model Version 1.0) report dated June 14, 2019, Golder developed a conceptual model for North Operations Area (NOA) based on design schematics, aerial images, and discussions with Kinross operators. KG-BM then provided Golder with site data and Golder converted the conceptual model to a numerical model using the GoldSim simulation platform. The numerical model is a probabilistic water balance model that allows for simulations of variable climatic conditions and is updated on a quarterly basis.

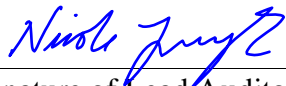
In 2019, Forte Dynamics created a comprehensive, probabilistic water balance model for the Vantage Complex. Golder will be adding the Vantage Complex to the Bald Mountain/Mooney GoldSim model in 2020.

The Water Balance models were found to be comprehensive and appropriate for the operations.

A Pond Level Management procedure describes normal operating conditions of the ponds and actions to take when pond levels rise or fall out of the optimal ranges. Operators are required to complete shift reports and record pond levels and flowrates of barren and pregnant leach solution. In addition, the Water Pollution Control Permits define a Monitoring and Inspection Program for each of the heap leach areas.

KG-BM's Water Pollution Control Permits require a minimum 2-foot freeboard in all ponds. The two Vantage ponds are designed to provide 24 hours of pad drain down in case of power loss, plus runoff from a 25-year, 24-hour storm event, plus direct precipitation to pond surfaces. In addition, they can withstand the runoff resulting from a 100-year, 24-hour storm event

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without overtopping. Mooney South and North have been designed to contain the 25-year, 24-hour storm event and maintain the required freeboard.

KG-BM has two weather stations (Mooney Basin and BM Admin) that measure precipitation. Daily precipitation totals are entered into the water balance models. Golder updates and reviews the Bald Mountain/Mooney water balance model on a quarterly basis. KG-BM evaluates the need to revise operating practices based on the results from the water balance model updates.

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

- The operation is:
- in full compliance
  - in substantial compliance
  - not in compliance with Standard of Practice 4.4.

*Discuss the basis for the Finding Identified:*

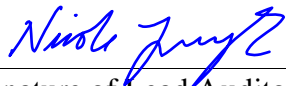
KG-BM is in FULL COMPLIANCE with Standard Practice 4.4 requiring measures to protect birds, other wildlife, and livestock from adverse effects of cyanide process solutions.

KG-BM has implemented strict operational controls to ensure that wildlife, birds, and livestock do not access open solutions containing cyanide. All barren and pregnant solution ponds are covered with bird balls and there is fencing around the entire perimeter of the ponds. Solution from the heap leach pads is either contained within closed piping or is in ditches covered with gravel.

Based on a review of historical pregnant leach solution (PLS) data, Weak Acid Dissociable (WAD) cyanide is typically below 50 mg/L. Since the PLS may exceed 50 mg/L, PLS and storm/event ponds are covered with bird balls to prevent access by birds. All process ponds are surrounded with fencing. KG-BM has dedicated an operator to prevent/mitigate ponding on the heap leach pads. Based on review of wildlife mortality records, KG-BM's pond management practices have been effective in preventing wildlife mortalities.

The leach pads are operated to prevent ponding of barren leach solution. KG-BM uses an array of trunk lines, piping headers, emitter tubing, emitters (drip heads) and valves to effectively control where barren leach solution is applied. Emitters are used instead of sprinklers to

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prevent the overspray of solution off the liners. SOPs are established for the inspection, operation, and maintenance of the heap leach pads, including the solution lines.

#### 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  
                               in substantial compliance  
                               not in compliance with Standard of Practice 4.5.

*Discuss the basis for the Finding Identified:*

KG-BM does not directly or indirectly discharge to any surface water. Surface water is not located within the mine permit boundary. In addition, KG-BM operates the heap leach operations as zero discharge processes.

#### 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  
                               in substantial compliance  
                               not in compliance with Standard of Practice 4.6.

*Discuss the basis for the Finding Identified:*

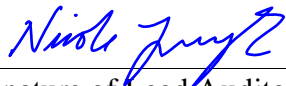
KG-BM is in FULL COMPLIANCE with Standard Practice 4.6 requiring measures to manage seepage from cyanide facilities to protect the beneficial uses of ground water.

KG-BM heap leach operations are designed and operated as zero-discharge facilities. The Process #2 and Mooney North, South, and Deep South operations were constructed to minimize seepage. For the Vantage Complex, leak detection systems for the pad, solution collection area, collection ditches, and process and storm/event ponds have been installed.

KG-BM is required to conduct groundwater monitoring at 2 water wells down gradient of the Process #2 operations, 6 monitoring wells and 4 water wells located in the vicinity of the

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Mooney Basin operations, and 5 water supply wells and 6 monitoring wells for the Vantage Complex. The numerical standard for cyanide in groundwater is 0.2mg/L. A review of recertification period monitoring results for the Vantage, Bald Mountain, and Mooney Basin wells demonstrated that WAD cyanide results are below the detection level of 0.01 mg/L (below the numerical standard that applies to KG-BM ) in all wells that were sampled. WAD cyanide has not been detected in any of the groundwater monitoring and water supply wells.

KG-BM is an open pit operation with no underground mines.

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

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

*Discuss the basis for the Finding Identified:*

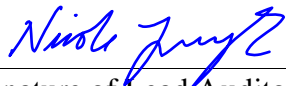
The operation is in FULL COMPLIANCE with Standard Practice 4.7 in providing spill prevention or containment measures for process tanks and pipelines.

Containment is provided for all cyanide unloading, storage, and process solution tanks in all process plants. KG-BM does not do any mixing of solid cyanide and water, the operation is supplied with sodium cyanide solution from the cyanide producer.

The capacity of the secondary containments to hold the volume of the largest tank within the containment and any piping flow back to the tank were assessed during the 2013 International Cyanide Management Code (ICMC) Recertification Audit and found to be adequate. As noted in the 2017 ICMC Recertification Audit report, no facility changes or additions occurred in the 3 years since the 2013 ICMC Recertification Audit to change that conclusion. No facility changes involving secondary containments have been made at the Process #2 or Mooney South and North Process Plants since the 2017 ICMC Recertification Audit; therefore, the original 2013 assessment is still valid.

The Vantage Complex is a new facility since the 2017 ICMC Recertification Audit. The two Vantage cyanide storage tanks and the pregnant solution tank are located within the perimeter of the Process Pond. The Process Pond has sufficient capacity to hold the contents of the three

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tanks with additional capacity for the design storm event. The Vantage CIC plant provides 110% secondary containment capacity of the largest tank within the plant through a combination of sloping floor, floor sumps, concrete containment berms, and an HDPE-lined overflow channel that leads to the Process Pond.

KG-BM has implemented procedures to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in secondary containment areas.

KG-BM has constructed all pipelines with spill prevention and containment measures to collect leaks and prevent releases. All process pipelines outside of the process plants and containment areas are in HDPE lined ditches that drain to a process pond or are double walled. For the Vantage Complex, the pregnant solution collected in the underdrain system discharges through a manifold and flows through a 30" diameter carbon steel pipe to the Pregnant Solution Tank.

Cyanide tanks and pipelines have been constructed of materials that are compatible with cyanide and high pH conditions.

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

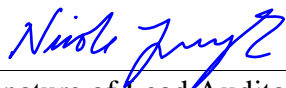
- The operation is:
- in full compliance
  - in substantial compliance
  - not in compliance with Standard of Practice 4.8.

#### *Describe the basis for the Finding Identified:*

The operation is in FULL COMPLIANCE with Standard Practice 4.8 requiring quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

KG-BM required QA/QC programs during construction of heap leach pads and the Vantage project. Inspections of heap leach construction (either new or expansions) were completed. Testing on heap leach pad construction included earthwork lab and field testing, low hydraulic conductivity soil layer testing, geosynthetic clay liner testing, HPDE liner conformance testing, certificates, and lab test results, liner tests, and daily inspection reports.

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Information regarding the original QA/QC control processes used to construct the mine and manage changes up until this recertification period is from the 2017 Cyanide Code Recertification Audit Report. QA/QC documentation is available for the construction and expansion of heap leach pads that have occurred since the previous cyanide code audit.

KG-BM required QA/QC programs for all earth works projects related to tank foundations, earthen liners, liners for ponds and heap leach pads. All QA/QC programs addressed the suitability of materials and adequacy of soil compaction. The QA/QC reports include soil compaction tests, subgrade and concrete testing, fabrication material certificates and technical specifications for High Dense Polyethylene (HDPE) products, liners, piping, electrical and mechanical instrumentation. These reports include results from liner testing, field inspection reports, laboratory and field data, construction observations, and photographs. The mine maintains files with the QA/QC reports for its cyanide facilities.

Qualified engineers performed the QA/QC inspections and reviews during construction of the cyanide installations at KG-BM and prepared the final construction reports certifying that the facilities were constructed in accordance with the design drawings and technical specifications. The commissioning packages provide evidence that qualified personnel reviewed the construction of the cyanide facilities, and the facilities were built according to approved designs.

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

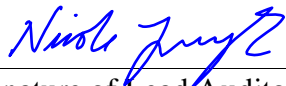
- The operation is:
- in full compliance
  - in substantial compliance
  - not in compliance with Standard of Practice 4.9.

*Describe the basis for the Finding Identified:*

KG-BM is in FULL COMPLIANCE with Standard Practice 4.9 requiring implementation of monitoring programs to evaluate the effects of cyanide use on wildlife, surface, and ground water quality.

There is a very comprehensive monitoring program in place which covers aspects such as monitoring sites, sample methodologies and sample analysis. Water monitoring is detailed in a document entitled “Water Monitoring and Management Plan”. The Plan lists monitoring site locations that are also shown on maps. Sampling and reporting frequencies are defined. The

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Plan describes sample labelling, preservation, storage, field measurements, sample handling and shipping, equipment decontamination, chain of custody procedures and quality control procedures. Record-keeping requirements are also defined.

Different parts of the monitoring activities, such as the wildlife mortality monitoring, or the daily monitoring of bird balls and fence integrity are detailed in operator instructions and SOPs.

All sampling and analytical protocols were developed by qualified personnel. Sampling plans and requirements are based on regulatory and industry standards and form the basis of environmental and operating permits issued to the site. Government oversight and regular reporting requirements ensure that sampling and monitoring activities are appropriate for the site activities and conditions. Sampling conditions including weather, temperature, pH, static water levels, depth to water, etc. are recorded in field logs.

KG-BM does not discharge cyanide process waters to surface water. There are no surface water bodies at the mine. Groundwater is monitored regularly, and results are reported according to the Water Pollution Control Permits (WPCPs). All groundwater sampling has been performed during the past three years, as required by the State.

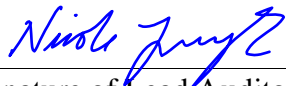
The mine has a dedicated operator who inspects cyanide ponds and facilities on a daily basis for the presence of bird balls, fence integrity, and wildlife mortality.

Monitoring at the mine is performed at appropriate frequencies to ensure effective detection of issues or problems with leak detection systems, wildlife controls, process solutions, and groundwater. Leak detection systems and wildlife mortality are checked daily. Process solutions are monitored continuously, and groundwater is monitored according to State permitted sampling plans.

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

*Standards 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  
                                   in substantial compliance  
                                   not in compliance with Standard of Practice 5.1.

*Describe the basis for the Finding Identified:*

KG-BM is in FULL COMPLIANCE with Standard Practice 5.1 requiring implementation of a plan and procedure for effective decommissioning of cyanide facilities to protect human health, wildlife, and livestock.

KG-BM has developed detailed and comprehensive plans of action for decommissioning the operation as part of the Water Pollution Control Permit application process. The plans include complete schedules along with timelines, activities to be completed as well as sections of the operation affected at any given time during the decommissioning phase. The plans address temporary closure, seasonal closure, and permanent closure.

KG-BM reviews and updates its Closure Plans as part of the WPCP permit renewal process that occurs every five years. All Closure Plans were last renewed / updated within five years prior to this recertification audit.

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

- The operation is:       in full compliance  
                                   in substantial compliance

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not in compliance with Standard of Practice 5.2.

*Describe the basis for this Finding Identified:*

The operation is in FULL COMPLIANCE with Standard Practice 5.2 requiring an assurance mechanism capable of fully funding cyanide-related decommissioning activities.

Kinross has a detailed costing analyses for the operation which will cover any eventuality during the decommissioning phase. KG-BM has developed a cost estimate for the funding of third-party implementation of the decommissioning activities.

The North Operations Area Project Reclamation Permit was most recently modified and approved by the State in 2019. The State sets the required bond amounts as part of the permit approval process. The Reclamation Permit for the South Operations Area (including the Vantage Complex) was approved in 2018.

The mine is required by Nevada Department of Environmental Protection (NDEP) and the U.S. Bureau of Land Management (BLM) regulations and Reclamation Permits to review and update the Reclamation Plans every three years or as required by changes in planned disturbances or operational modifications. The WPCPs (water pollution control permits) and the associated Closure Plans are required to be updated every five years. Cost estimates are included in these plans.

KG-BM has established an approved financial mechanism to cover the estimates costs for cyanide related decommissioning activities. The mechanism is a surety bond. The cost estimates and the associated bonds are reviewed as part of the governmental permitting and update processes that happen at least every five years.

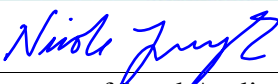
6. *WORKER SAFETY* Protect workers' health and safety from exposure to cyanide.

*Standards 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  
                                   in substantial compliance  
                                   not in compliance with Standard of Practice 6.1.

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*Describe the basis for the Finding Identified:*

The operation is in FULL COMPLIANCE with Standard Practice 6.1 requiring the identification of potential cyanide exposure scenarios and take measures, as necessary, to eliminate, reduce and control them.

KG-BM has developed and implemented formally controlled procedures and plans for the operation that describe the management and operation of the facility including all cyanide-related tasks. Standard Operating Procedures (SOPs) were found to be detailed enough to help minimize the risk that employees would be exposed to cyanide during operations. The procedures detail task specific Personal Protective Equipment (PPE) requirements. Pre- and Post-Shift inspections are completed and documented for all cyanide processing areas to identify any potential issues.

The operation has a formal written procedure HS-S-08.01, Management of Change (MOC), to manage changes to the facility. The MOC procedure identifies changes to the facility and its operating practices that may increase the potential for workers to be exposed to cyanide before such changes are implemented so that they can be evaluated and addressed as necessary. The procedure requires a written notification to safety personnel and a sign-off before the change can be instituted.

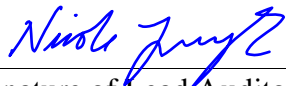
The operation considers worker input into the development of health and safety procedures through various mechanisms and implements an open-door policy for employees to provide input into operations including health and safety matters. Weekly safety talks and morning line out meetings provide operators with the opportunity for input. Discussions with operators confirmed these input opportunities.

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
  - in substantial compliance
  - not in compliance with Standard of Practice 6.2.

*Describe the basis for the Finding Identified:*

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The operation is in FULL COMPLIANCE with Standard Practice 6.2 to operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

Standard Operating Procedures require operators to sample process solutions and stress the importance of maintaining the pH range within the desired range to prevent the generation of HCN. Operators sample the pregnant, tail, and barren streams twice per shift and analyze for pH and make adjustments as necessary.

Ambient HCN monitors have been located throughout the four process plants. In addition, operators wear personal HCN monitoring devices when they are in the process plant areas. The ambient and personal monitors have a low-level alarm set at 4 ppm and a high-level alarm set at 10 ppm. At 4 ppm, all non-authorized personnel are to leave the area while authorized personnel are permitted to enter the affected area for 10 minutes at a time with a 15-minute interval between entries. At 10 ppm, all personnel are to leave the area and wait for the Mine Rescue Team to respond.

A Hydrogen Cyanide Exposure Assessment was conducted in 2007, 2017, and most recently in the Vantage Complex in 2020. No elevated HCN levels were detected during the exposure survey in 2020.

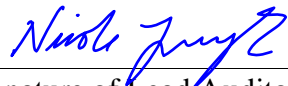
As a precaution, process buildings are considered to be higher risk areas and fixed/permanent, as well as personal, HCN monitors are required. Signs on doors into the buildings are used to notify employees of the presence of cyanide. PPE requirements are detailed in individual SOPs. There are no activities or areas that have been identified that require additional respiratory PPE.

Personal and stationary HCN Gas Monitors are maintained, tested, and calibrated per manufacturer specifications. Calibrations are managed through the electronic work order system. Detailed calibration procedures, work order instructions, work order records, and calibration records were sampled for the recertification period and were found to be complete.

The signage at the mine was physically evaluated throughout the audit and was found to be appropriate for the operation. Warning signs included locations where cyanide is present, areas where no smoking, open flames, eating, or drinking are not allowed, and PPE requirements.

Warning signs have been posted on or next to each man-door for the four process plants. The warning signs state that cyanide is present in the area and caution is to be exercised. The signs also state that there is no smoking, open flames, eating, and drinking allowed in the area. No smoking signs are also posted around the cyanide storage tanks located outside. In addition to these warning signs, cyanide safety training is delivered to all mine employees and the risks associated with cyanide are reviewed. Area-specific training is also given to personnel working

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in specific areas of the plant. Cyanide locations and associated risks are covered in detail during these trainings. Records were sampled for the recertification period and were found to be complete. Employee awareness of cyanide locations, prohibited activities, and PPE use was tested during the audit and was found to be very good.

Confirmation was made that the mine operation is using high strength cyanide solution that is dyed red for clear identification. The red dye is added at the Cyanco production facility.

The operation has installed showers, eye wash station and fire extinguishers at strategic locations throughout the operation in all areas where there is a potential for exposure to cyanide. Operators test the eyewash and safety shower in the unloading area prior to a delivery to ensure they are functional. The operators test every eyewash/safety shower in the process plants every shift. Fire extinguishers are visually inspected monthly and hydrostatically tested every three years.

The operation has identified all tanks and pipes that contain cyanide solution to alert workers of their contents. Pipes containing cyanide are marked as containing cyanide solution and flow direction is indicated. All cyanide storage tanks are identified as "Cyanide". Reagent-strength cyanide lines are painted purple at all four process plants. Boards that identify the color-coding of the piping within the process plants is on display in each process plant.

The Sodium Cyanide Solution (3414) Safety Data Sheet (SDS) is available to all employees. KG-BM uses 3E software for managing its safety data sheets. The SDS and posted cautionary statements (posters) are in English, the language spoken at the mine. Confirmation was made during the audit that employees are aware of how to access the SDSs and that the information is readily available to them through the online software.

The mine maintains an incident investigation policy. KG-BM did not experience any cyanide exposure incidents during the recertification period. Incident investigation records were sampled for non-cyanide related incidents for the recertification period. Confirmation was made during the audit that the incident investigation program has been implemented for many years and is being maintained, as defined.

The Supervisor of an area must initiate an investigation and involve the Safety Department within 24 hours following a safety incident that requires medical treatment.

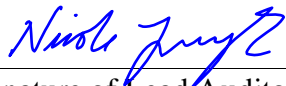
### 6.3 Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

- The operation is:
- in full compliance
  - in substantial compliance
  - not in compliance with Standard of Practice 6.3.

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*Summarize the basis for this Finding Identified:*

The operation is in FULL COMPLIANCE with Standard Practice 6.3 to develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

The operation has made available cyanide antidote kits (amyl nitrate), water, oxygen, resuscitators, radios, telephones, and alarms in the process areas.

Cyanide antidote kits were located inside the control rooms or electrical rooms at the process plants. Oxygen and defibrillators were also present either next to or near the cyanide antidote kits. Telephones are available for use in the control rooms and most electrical rooms. Operators also carry a radio that allows them to communicate on a normal basis and to broadcast an emergency notification by stating "Code Blue" over the radio. Members of the Mine Rescue Team and process plant operators are trained and authorized to administer the antidote as first responders to an exposure incident.

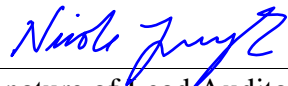
Operators inspect fire extinguishers, first aid kits, the trauma kit, and antidote kits and ensure they are accessible every shift as part of the Workplace Inspection conducted at the beginning of every shift. Expiration dates are noted on all cyanide antidote kits and containers of supplied oxygen. All of the cyanide kits and supplied oxygen containers observed during the audit had expiration dates that were in the future (i.e., none were expired). KG-BM uses amyl nitrite as a cyanide antidote and refrigerates the amyl nitrate as specified by the manufacturer. This storage practice was confirmed during the audit.

KG-BM maintains a Cyanide Emergency Response Plan (CERP). The first five pages of the CERP detail the emergency actions to be taken if there is a cyanide exposure incident.

KG-BM has a Mine Rescue Team. Members of this team are trained at the EMT basic level and can provide first aid and medical assistance to workers who may be exposed to cyanide. Mine Rescue Team members can sustain patients until outside emergency service personnel arrive to provide advanced life support to patients.

KG-BM has two dedicated ambulances available onsite 24 hours/7 days per week. One of these ambulances is capable and authorized to transport patients to hospitals in Elko and/or Ely. Emergency procedures for the transport of cyanide exposure victims are in the CERP and Emergency Action Plan (EAP). The mine maintains a formal pre-hospital emergency care hospital agreement with Northeastern Nevada Regional hospital in Elko, Nevada. The mine has also shared its EAP with the hospital. Interviews were used to confirm that the mine has confirmed the hospital has adequate, qualified staff, equipment, and expertise to respond to cyanide exposures.

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The operation conducted emergency mock exposure drills during the recertification period. In addition to spill drills, the mine conducted man down (human cyanide exposure) drills during the recertification period. The emergency response drills provide a framework for continuous improvement by setting requirements to critique emergency and response procedures as well as performance against procedures. Where necessary, weaknesses are identified and improvements to the emergency response procedures made. Observations made are recorded using a tracking form where observations and opportunities for improvement are tracked and included in subsequent training events.

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

### *Standards of Practice*

#### 7.1 Prepare detailed emergency response plans for potential cyanide releases.

- The operation is:
- in full compliance
  - in substantial compliance
  - not in compliance with Standard of Practice 7.1.

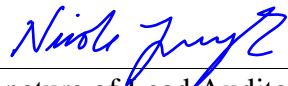
#### *Describe the basis for the Finding Identified:*

KG-BM is in FULL COMPLIANCE with Standard Practice 7.1 requiring the preparation of detailed emergency response plans for potential cyanide releases.

The KG-BM Emergency Action Plan (EAP) addresses potential accidental releases of cyanide. The EAP covers the Bald Mountain Mine, North Operations Area (NOA), and South Operations Area (SOA). The EAP sections that specifically address potential cyanide releases include: Cyanide Exposure First Aid, Cyanide Exposure Decontamination, and Guidelines for Specific Chemical Spills - Sodium Cyanide. In addition, a Cyanide Emergency Response Plan (CERP) is contained as an attachment to the EAP.

The EAP and/or CERP consider the potential cyanide failure scenarios required by the Code that are applicable to its operations. Specific responsibilities are outlined with the appropriate course of action to be taken. Each scenario is reviewed on an annual basis.

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KG-BM does not respond to transportation-related emergencies offsite unless the transportation company or the local emergency services request assistance. There are provisions for this type of response in the CERP, however.

The CERP describes the response actions required for various release scenarios. Actions required are specific to the type of release and include but are not limited to evacuation of site personnel and potentially affected communities and controlling the source of a release. addresses the use of cyanide antidotes and first aid measures for cyanide exposure. The Post Incident Analyses (PIA) section in the Bald Mountain HazMat Response Plan (Attachment B of the EAP) requires that a PIA be completed. The PIA is to include the identification of the root causal factors of an incident to prevent future events.

## 7.2 Involve site personnel and stakeholders in the planning process.

- The operation is:
- in full compliance
  - in substantial compliance
  - not in compliance with Standard of Practice 7.2.

*Describe the basis for the Finding Identified:*

KG-BM is in FULL COMPLIANCE with Standard Practice 7.2 requiring the involvement of site personnel and stakeholders in the planning process.

The Emergency Response Team (ERT) Leader reviews the EAP on an annual basis. All ERT members have a chance to provide input to the response procedures contained in the EAP during debriefs/critiques after a drill or actual event.

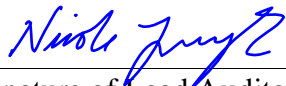
The ERT Leader routinely attends the Local Emergency Planning Committee (LEPC) meetings in White Pine, Elko, and Eureka counties. Attendees at these meetings are given the opportunity to ask questions and provide input to emergency response procedures and operations.

The ERT meets with the Cold Creek volunteer fire department and routinely meets with the three LEPCs noted above for discussions regarding the potential for cyanide releases on site or via transportation-related events.

Local response agencies have been involved in the cyanide emergency planning and response process at KG-BM through verbal agreements, KG-BM's attendance at LEPC meetings, and

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LEPC participation in drills at KG-BM. Elko County LEPC participates in a KG-BM response drill once per year.

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

- The operation is:
- in full compliance
  - in substantial compliance
  - not in compliance with Standard of Practice 7.3.

*Describe the basis for the Finding Identified:*

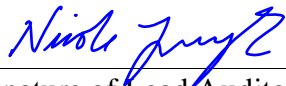
KG-BM is in FULL COMPLIANCE with Standard Practice 7.3 requiring the designation of appropriate personnel and commitment of necessary equipment and resources for emergency response.

Specific emergency teams have been identified who are on call 24/7. Each team that has been identified receives training as needed for their specific roles. Since the mine operates on a 24/7 basis, there are team members available at all hours to respond to any emergency. Each team has specific roles, duties and responsibilities that are detailed in the EAP. The EAP lists the 24-hour phone numbers for the Site Crisis Management Team (SCMT) members. In the event of an emergency, including an employee exposure to cyanide or a cyanide spill, the SCMT is activated over the site radio system. This call out initiates the response from the ERT and site management. The EAP appropriately addresses all Code requirements.

The EAP identifies roles and responsibilities in the event of an emergency, provides contact phone numbers, and defines training requirements. Emergency response equipment necessary for response to different types of events is listed in the EAP and equipment inspection requirements are defined. Cyanide antidote and oxygen supply equipment are checked at the beginning of each shift to ensure it is in its proper location and is not expired.

Elko County emergency services participate in one drill per year and White Pine and Eureka emergency services have been invited to participate in drills, but they have not yet accepted the invitation; however, they have participated in tabletop drills.

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7.4 Develop procedures for internal and external emergency notification and reporting.

- The operation is:
- in full compliance
  - in substantial compliance
  - not in compliance with Standard of Practice 7.4.

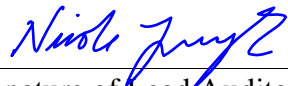
*Describe the basis for the Finding Identified:*

KG-BM is in FULL COMPLIANCE with Standard Practice 7.4 requiring the development of procedures for internal and external emergency notification and reporting.

The EAP contains emergency phone numbers and instructions for notifying security, management, mine environmental and safety departments, and the ERT of emergencies. The EAP also contains procedures and phone numbers for key external stakeholders. Information was available in the EAP for: community officials for Elko, Ely, and Eureka, Northeastern NV Regional Hospital, Eureka Clinic, Ely Hospital, state and federal regulatory agencies, local media, and outside emergency response companies (ChemTrec, Cyanco, and Transwood). The Injury/Illness Medical Emergencies section in the EAP describes the procedures for contacting offsite medical services. In addition, the Hazardous Materials Spill and Emergency Response Plan specifies who is to be notified in the event of a spill (cyanide or other releases).

In the unlikely event that a cyanide emergency might affect local communities, the EAP states that site command will contact the White Pine County or Eureka County Sheriff's office to coordinate evacuation of local residents as well as road closures. The site's General Manager will direct public statements to the media if required.

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

- The operation is:
- in full compliance
  - in substantial compliance
  - not in compliance with Standard of Practice 7.5.

*Describe the basis for the Finding Identified:*

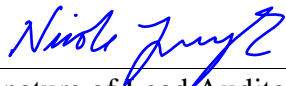
KG-BM is in FULL COMPLIANCE with Standard Practice 7.5 requiring the incorporation into response plans monitoring elements and remediation measures that account for the additional hazards of using cyanide treatment chemicals.

The EAP describes specific remediation steps that are to be taken for likely cyanide release scenarios. Recovery of solutions and/or solids, decontamination of soils/media, and management/disposal of clean-up soil/debris are addressed in the EAP. Provision of an alternate drinking water supply does not apply to this operation. The only drinking water supply on site is located upgradient of Process #2 Plant and heap leach facilities. No other drinking water supplies are located within the vicinity of the other three process plants and heap leach operations.

The EAP does not address the use of chemicals to treat cyanide that has been released into surface water since there are no surface waters located near or on the site. This was accepted as appropriate by the audit team.

The Hazardous Materials Spill and Emergency Response Plan in the EAP requires that all spills of regulated substances outside of a containment area are reported to the Environmental Department. If a spill occurs to ground, the soil is removed until visual confirmation is made that all cyanide has been removed. Samples are taken to confirm that remaining concentrations are not above 0.2 ppm. Excavated cyanide-contaminated soils and recovered water/solution (if any) are moved to a leach pad. Interviews confirmed that the mine would work local regulators to determine any additional sampling needs based on the circumstances of the spill and/or release event. The Environmental Department will then, together with local regulators, identify the need for any environmental monitoring and specify what is required.

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

- The operation is:
- in full compliance
  - in substantial compliance
  - not in compliance with Standard of Practice 7.6.

*Describe the basis for the Finding Identified:*

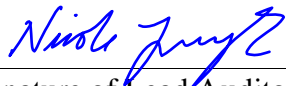
KG-BM is in FULL COMPLIANCE with Standard Practice 7.6 requiring the periodic evaluation of response procedures and capabilities and revises them as needed.

The EAP and its attachments are reviewed on an annual basis and updates are made as needed.

The ERT completes at least one cyanide related mock drill each year. Drill scenarios for the recertification period included a man down situation, retrieval of an unresponsive patient, establishment of a decontamination area, dispatch of local ambulance and air emergency services, and breach of a cyanide tank at the new Vantage process plant.

The EAP outlines the requirement to conduct a post-incident analysis and critique so that operations may be improved based on lessons learned from the response to an emergency. KG-BM has not had any cyanide related emergencies in the recertification period.

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

*Standards of Practice*

**8.1** Train workers to understand the hazards associated with cyanide use.

- The operation is:
- in full compliance
  - in substantial compliance
  - not in compliance with Standard of Practice 8.1.

*Describe the basis for the Finding Identified:*

KG-BM is in FULL COMPLIANCE with Standard Practice 8.1 requiring the training of workers to understand the hazards associated with cyanide use.

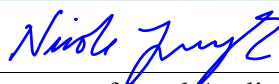
All Employees who may encounter cyanide are trained to recognize cyanide hazards during the new employee training process. Cyanide hazard recognition information is included in several different cyanide-related training packages. One of the recent (2020) updated training sessions is: "Process Employee Cyanide Training." This was reviewed by the audit team.

Cyanide hazard recognition refresher training is delivered to employees on an annual basis. The type of training and the exact content of the training is variable (examples: unloading related hazards versus decontamination of equipment before maintenance, etc.), depending on the job assignments of the person being trained.

All training records per employee, are retained while the employee works for the mine. The Mine Trainer was interviewed during the audit. Records including: the training tracker, training materials, sign-off sheets were reviewed for the recertification period and were found to be acceptable.

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## 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
  - in substantial compliance
  - not in compliance with Standard of Practice 8.2.

*Describe the basis for the Finding Identified:*

KG-BM is in FULL COMPLIANCE with Standard Practice 8.2 requiring training of appropriate personnel to operate the facility according to systems and procedures that protect human health, the community, and the environment.

Employees are trained to perform their normal tasks, including unloading, operations, and maintenance, that is protective of the environment, with minimum risk to health and safety. Operations training, area-specific training, and task-specific training is given to employees, depending on their role in the organization.

The training elements for each job involving cyanide management are identified in the training materials. Individual parts of the overall training program are tracked separately. There are an extensive number of types of training delivered and tracked.

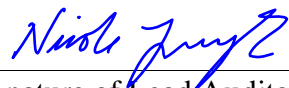
The Ore Processing Trainer, supervisors, and training staff with significant experience in safely managing cyanide and with operations provide the training to employees. MSHA (Mine Safety and Health Administration) requires all task training to be conducted and signed off by a competent trainer. At a minimum, cyanide safety training, training on specific tasks to be performed as part of the job, area risk training, and other critical safety trainings must be completed prior to an employee starting work in an area with cyanide. Extensive training on all tasks is performed and competence is confirmed in accordance with MSHA regulations. Training practices were verified through interviews and a review of training records for the recertification period.

Refresher training on cyanide operations safety is conducted on an annual basis and is an MSHA requirement. The training is designed to ensure that employees continue to perform their jobs in a safe and environmentally protective manner. Records for the recertification period were reviewed and confirmed. All training on cyanide-related and operations-related topics is evaluated for effectiveness through either testing or skills observation. Training records are retained throughout an individual's employment.

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Records include the name of the trainer, the date of the training, the topics covered, and competency determination. A new, improved format for record-keeping was developed in 2020. Records reviewed from the recertification period were found to be compliant with Cyanide Code requirements.

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

- The operation is:
- in full compliance
  - in substantial compliance
  - not in compliance with Standard of Practice 8.3.

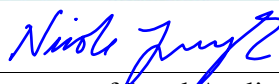
*Describe the basis for the Finding Identified:*

KG-BM is in FULL COMPLIANCE with Standard Practice 8.3 requiring the training of appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

All cyanide unloading, operations and maintenance personnel in the mine are trained and refreshed annually in the procedures to be followed if cyanide is released. In addition, if maintenance is to be done on a 30% solution line or process, a Field Level Risk Assessment (FLRA) must be done prior to the maintenance task. The FLRA is done by a team and must have a person from operations in attendance. The training also includes the information that is to be used if there is a spill including details regarding alarms, radio channels, and evacuation instructions.

In addition to procedures for managing a cyanide release, cyanide response personnel, unloading, operations, and maintenance employees are also trained and refreshed annually in decontamination and first aid procedures. In addition, there is one trained emergency response person who works on each shift. Unloading, production and maintenance personnel take part in routine emergency drills to test and improve their response skills. This was confirmed through interviews with the Trainer, employees, and through a review of training records from the recertification period. Both the Emergency Response Coordinators and members of the Emergency Response Team are trained in emergency procedures and the use of emergency equipment. Each year an emergency response training schedule is developed, and training records are maintained. Annual

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training plans, drill records, and associated training records were reviewed for the recertification period and were found to be acceptable.

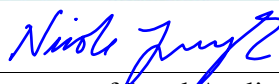
The Site Crisis Management Team (SCMT) Emergency Services Coordinator confirmed that local response agencies have been informed and involved in the cyanide emergency planning and response process at KG-BM. KG-BM personnel attend Local Emergency Planning Committee (LEPC) meetings and LEPC members participate in drills at KG-BM once per year.

Emergency response drills include “man down” worker exposure and spill (environmental release) scenarios at least annually. The results of drills are evaluated for training purposes and procedures / plans are revised if deficiencies are identified. The requirement to do so is written into the emergency procedures and records were available for the recertification period to demonstrate that this practice is occurring.

The results of drills are evaluated for training purposes and procedures / plans are revised if deficiencies are identified. The requirement to do so is written into the emergency procedures and records were available for the recertification period to demonstrate that this practice is occurring.

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## 9. DIALOGUE Engage in public consultation and disclosure.

### *Standards of Practice*

#### 9.1 Provide stakeholders the opportunity to communicate issues of concern.

- The operation is:
- in full compliance
  - in substantial compliance
  - not in compliance with Standard of Practice 9.1.

#### *Describe the basis for the Finding Identified:*

KG-BM is in FULL COMPLIANCE with Standard Practice 9.1 to provide stakeholders the opportunity to communicate issues of concern.

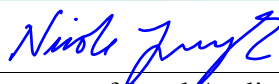
Kinross, and KG-BM specifically, work openly with stakeholders and have developed and implemented robust stakeholder engagement processes to ensure the effectiveness of communications. Kinross maintains a “Community Grievance Policy” (TAS-CR-POL-002) that defines detailed requirements for all locations. KG-BM also maintains a local version of this policy as the “KG Mining (Bald Mountain) Inc. Grievance/Complaint Procedure. Each grievance is logged, thoroughly investigated, and resolved. Records from the recertification period were available for review during the audit and were found to be acceptable.

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

- The operation is:
- in full compliance
  - in substantial compliance
  - not in compliance with Standard of Practice 9.2.

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*Describe the basis for the Finding Identified:*

KG-BM is in FULL COMPLIANCE with Standard Practice 9.2 to initiate dialogue describing cyanide management procedures and responsively addresses identified concerns.

The mine maintains a detailed Stakeholder Communication Plan where the strategy for communication is defined for each stakeholder. Besides inviting all stakeholders to have open dialogue, the mine also invites stakeholders to the site for annual meetings, site tours, and other events. According to interviews and a review of presentation materials, issues such as cyanide management practices, potential EHS concerns and controls used by the mine for managing these concerns are including during stakeholder interactions.

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

- The operation is:
- in full compliance
  - in substantial compliance
  - not in compliance with Standard of Practice 9.3.

*Describe the basis for the Finding Identified:*

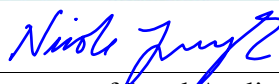
KG-BM is in FULL COMPLIANCE with Standard Practice 9.3 to make appropriate operational and environmental information regarding cyanide available to stakeholders.

Written descriptions that are used for stakeholder engagement showing how activities at the mine are conducted and how cyanide is managed were available for review during the audit. One document entitled “Cyanide Safety Management: Cyanide and Its Application to Gold Recovery at Bald Mountain” details the use of cyanide at the mine and the environmental and safety considerations / controls.

The local population is highly literate. Although verbal communications during tours and community outreach events are common, the local population is very capable of reading through the written information from the mine.

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KG-BM has formal crisis and emergency management plans and procedures for managing emergencies and notifying stakeholders, including government notifications.

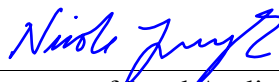
Cyanide release or exposure events to the level of those outlined by the Cyanide Code would likely trigger activation of the Kinross Crisis and Emergency Management System. In this crisis management system, all relevant stakeholders are listed and would be contacted if appropriate. Additionally, the crisis management system requires that press releases be made available to area media.

Governmental reports including the results of sampling efforts and environmentally relevant operations data were reviewed during the audit. No other stakeholder reporting was required due during the recertification period because the operation did not experience any release or exposure events.

Any release that qualifies as a “state reportable spill” is reported to the state and becomes publicly available information. Multiple interviews during the recertification audit were used to confirm that these practices are implemented, consistently applied, and appropriate for the organization.

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