ICMI International Cyanide Management Code
Summary Audit Report

Kinross Gold Corporation
Russian Ocean Supply Chain
2019 Certification Audit

Submitted to:
The International Cyanide Management Institute
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Kinross Russian Ocean Supply Chain Summary

Company Name & Contact Information

| Name of Operation: | Kinross Gold Corporation  
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Kinross Russian Ocean Supply Chain Description & Scope of Certification

Kinross Gold Corporation global headquarters are in Toronto, Canada and the company operates mining projects globally. The Kinross Russian Ocean Supply Chain includes the ocean carriers and ocean ports that are selected by Kinross as part of the overall transportation system used for the Kupol Mine. Parts of the overall transportation system (from producer to Kupol Mine) that are already part of an International Cyanide Management Code (ICMC) certified supply chain are mentioned in table on page 4 of this report, but they are not included in the Kinross Russian Ocean Supply Chain certification scope. The mine is in a remote north-central region of the Russian Federation known as the Chukotka Autonomous Okrug (AO). The mine is 100% owned by Kinross and is operated by the wholly-owned subsidiary Chukotka Mining and Geological Company (CMGC).

Kinross has procured solid sodium cyanide for the Kupol Mine from several different suppliers since the mine was originally certified to the International Cyanide Management Code (ICMC) in 2009. The most recent audit of the mine was conducted in 2017. During the 2017 mine audit, the auditor confirmed compliance with ICMC-related producer and transportation-related requirements. The mine was able to demonstrate that, aside from one emergency shipment related to the 2015 Port of Tianjin fire and explosion, all producers and transporters were ICMC certified. Due Diligence reports of ports, rail, and ocean carriers were reviewed during the 2017 mine audit and were found to be complete and acceptable.

Due to the specialized considerations that need to be made for the Kupol Mine cyanide delivery process, Kinross takes control of the cyanide when it is loaded onto an ocean vessel at the departure port closest to the producer. The supply of cyanide to the Kupol Mine is somewhat
unique in that cyanide is not shipped to the mine continuously throughout the year, but rather during one delivery “event” in the summer/early fall to the Port of Pevek each year. From the Port of Pevek the cyanide is moved to a Kinross storage facility near the port until ground transportation to the mine is possible in the winter after the ice roads form.

The interim storage operations and the transport activities over the ice roads to the mine are part of the certified supply chain that is listed under the Kinross “Chukotka Mining and Geological Company (CMGC) Transportation Group” supply chain. The supply chain was originally certified in 2009 and was most recently re-certified in February 2017.

Kinross did register (and certify) a supply chain with ICMI in 2013/2014 that was entitled the “Kinross Russian Supply Chain”, but the ocean transport part of that supply chain changed significantly following the certification in 2014. Kinross continued to maintain ICMC compliance, but the “Kinross Russian Supply Chain” was determined to be no longer accurate and was not included in the 2017 Kupol audit. Kinross demonstrated compliance during the 2017 Kupol Mine audit through the use of procurement records from ICMC-certified suppliers using their supplier-certified supply chains and port/rail/ocean carrier due diligence reports.

Aside from the above-mentioned emergency shipment in 2015, Kinross has continuously ensured that all cyanide used at the Kupol Mine has been sourced from ICMC-certified producers and shipped using ICMC-certified road transportation operations since the last formal confirmation was made during the 2013 audit of the Kinross Russian Supply Chain.

In order to improve transparency and better align its supply chains to those of its suppliers and transporters, Kinross has decided to re-structure its ICMC registration activities and formally certify two supply chains in place of the original Kinross Russian Supply Chain. The two new supply chain listings are the:

- Kinross Russian Ocean Supply Chain
- Kinross Russian Rail Supply Chain

This certification audit report addresses the Kinross Russian Ocean Supply Chain. The Kinross Russian Rail Supply Chain is addressed in a separate certification activity and report.

Kinross has developed formal practices that ensure that all ICMI International Cyanide Management Code requirements are fulfilled. Due Diligence reviews are performed at all ports and for all ocean carriers that are not otherwise included in supplier certified supply chains.
In addition to Kinross’ efforts to ensure that ICMC requirements are fulfilled, there are many agencies charted with the task of confirming that shipping is conducted in a safe and secure manner. One such organization is the International Maritime Organization (IMO). The IMO was established in Geneva in 1948 and it currently headquartered in London, United Kingdom. The IMO is a specialized agency of the United Nations. The IMO’s primary purpose is to develop and maintain a comprehensive regulatory framework for shipping. The IMO regulates practices associated with safety, environmental concerns, legal matters, technical co-operation, maritime security and the efficiency of shipping. One initiative of the IMO is the International Convention for the Safety of Life at Sea (SOLAS), which was enacted in 1974. Ocean carriers are required to have periodic audits of their safety programs. The provisions of SOLAS include: fire protection, lifesaving equipment, radio communications, safety of navigation, transportation of dangerous goods, management of safe operations of ships, and maritime security.

With regard to port safety and security, amendments to the SOLAS Convention were enacted in 2002. These amendments gave rise to the International Ship and Port Facility Security (ISPS) Code, which went into effect on 1 July 2004. The concept of the code is to provide layered and redundant defenses against smuggling, terrorism, piracy, stowaways, etc. The ISPS Code required most ships and port facilities engaged in international trade to establish and maintain strict security procedures as specified in ship and port specific Ship Security Plans and Port Facility Security Plans. Container ships and ports that service them are required to have multiple third-party audits of safety and security. Each ship and each port involved in international trade undergoes external security, safety, and management system audits at least annually.

The two ocean ports located in the Russian Federation that are part of this certification report are:
- Port of Pevek
- Port of Arkhangelsk

This Kinross Russian Ocean Supply Chain includes the following two Russian ocean carriers:
- JSC Sakhalin Shipping Company (SASCO)
- TC Nord Project LLC (Nord Project)
Blue Shading in the table below indicates that this transportation segment is within scope of this Supply Chain Certification.

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**Port of Pevek**

The Port of Pevek is located on Chaunskaya Bay, part of the East Siberian Sea. Pevek is the northernmost town in Russia and is located above the Arctic Circle. The estimated population of the city is approximately 4,000-5,000 people. The area has short summers and long cold winters.

The Port of Pevek is a state-owned port that is staffed and manned by state employees. The Port of Pevek is drug and alcohol free. The port is authorized by the Russian Ministry of Transport to receive cyanide. The port is completely fenced in, and all access to the port is strictly controlled at all access points. Emergency response at the Port of Pevek is provided by the Pevek Fire Brigade and State Transportation Police.

The Port of Pevek is not considered to be a cyanide interim storage location. The cyanide is offloaded from the vessels by crane and the cargo is loaded directly onto Kinross owned and controlled trucks (see Kinross Chukotka Mining and Geological Company (CMGC) Transportation Group certification audit report). The process of offloading is generally less than a day. The cyanide sea containers are under the control of the Transportation Police during the entire time that they are offboarded from the ship directly onto trucks and brought to the Kinross KM21 storage facility.

Port and vessel security are managed in accordance with the International Ship and Port Facility Security Code (ISPS Code). The ISPS Code is implemented as part of chapter XI-2 (special measures to enhance maritime security) in the International Convention for the Safety of Life at Sea (SOLAS). Since the ISPS Code is part of SOLAS, compliance is mandatory for all Contracting Governments to SOLAS. The Russian Federation is a member of both the IMO and of SOLAS.

Cyanide is shipped to the Port of Pevek once annually from each supplier. The shipments arrive into the port in the August/September timeframe. The cyanide is transported using the Kinross certified road transporter (CMGC). The cyanide is then stored in a secure Kinross storage facility (KM21) that is located 21 km south of the Port of Pevek. The cyanide stays in the storage facility until the ice roads form in the winter months. Once the ice roads are ready for transportation to begin, the cyanide containers are delivered via secure truck convoy to the Kupol Mine roughly 400 km south of the Port of Pevek.

Kinross personnel performed an on-site Due Diligence Assessment of the port using a formal ICMC-based protocol in June 2019. Kinross determined that the Port of Pevek fulfills all applicable ICMC-relevant requirements and that the use of the port is acceptable for the receipt of cyanide.
**Port of Arkhangelsk**

The Port of Arkhangelsk is located where the Northern Dvina River meets the White Sea. Together with the Pechora River to the east, the Northern Dvina River drains most of Northwest Russia into the Arctic Ocean. The port is well connected to coastal areas along the north of Russia. The population of the city is approximately 350,000. With a history dating back as far as back as 1584, the Port of Arkhangelsk is one of the most important seaports in Russia, second only to Saint Petersburg. Approximately two million tons of cargo go through the port each year. The port is generally iced-in approximately five months of the year, but with today’s technology and ice breaking ships, the port can receive goods throughout the year. Arkhangelsk’s infrastructure is well-developed, and cyanide is delivered to the port by rail.

The port has fencing around the entire perimeter, with access strictly controlled. There are security cameras in place as well. In addition, cyanide at the port is stored in its shipping container on concrete, with secondary containment used to ensure that a cyanide spill would not reach the ground.

Port and vessel security are managed in accordance with the International Ship and Port Facility Security Code (ISPS Code). The ISPS Code is implemented as part of chapter XI-2 (special measures to enhance maritime security) in the International Convention for the Safety of Life at Sea (SOLAS). Since the ISPS Code is part of SOLAS, compliance is mandatory for all Contracting Governments to SOLAS. The Russian Federation is a member of both the IMO and of SOLAS.

Kinross personnel performed an on-site Due Diligence Assessment of the port using a formal ICMC-based protocol in June 2019. Kinross determined that the Port of Arkhangelsk fulfills all applicable ICMC-relevant requirements and that the use of the port is acceptable for the receipt of cyanide.

**TC Nord Project LLC (Nord Project)**

TC Nord Project LLC (Nord Project) was founded in 2010 to service the northern ports of Russia, primarily from the Port of Arkhangelsk. Nord Project headquarters are in Saint Petersburg. Since its domestic beginnings, Nord Project has expanded into imports and exports of cargo year-round between the Port of Arkhangelsk and ports in Russia, China, Europe, and the U.S. It is the largest cargo shipping company operating out of the Port of Arkhangelsk.

All vessels delivering cargo at any port within Chukotka (such as the Port of Pevek) must be Russian owned and Russian flagged. All crew members must be Russian and have a special permit (Chukotka pass) to visit, travel, or work within the Chukotka region. Nord Project is one of the
very few companies that fulfills these strict requirements and maintains a fleet that is suited for navigating the northern seas.

Today Nord Project is one of the leading companies providing sea transportations of bulk, breakbulk, general, project and containerized cargos in the Arctic regions of Russian North to all ports of the Northern Sea Route from Murmansk to Pevek. It is the largest cargo transporter operating out of the Port of Arkhangelsk.

The company has a fleet of multipurpose high ice class vessels with deadweight capacity from 7 up to 20 thousand metric tons. The vessels are equipped with cranes with extremely high weight loading capacities. The company is authorized by the Russian Government to transport dangerous goods, including cyanide.

Nord Project reported that it undergoes formal environmental, health, and safety (EHS) audits on at least an annual basis. These audits focus on Safety of Life at Sea (SOLAS) requirements and Dangerous Goods Authorization requirements. Formal EHS procedures including emergency procedures are maintained. Emergency drills are conducted every three months according to a defined plan.

**JSC Sakhalin Shipping Company (SASCO)**

The Sakhalin Shipping Company, a joint stock company (SASCO) is one of the largest Russian shipping companies. SASCO vessels, most of which ice-classed, carry a wide range of cargo, including dangerous goods. According to its web-site, SASCO transports two thirds of all Russian domestic sea cargo. SASCO is a significant export and import cargo carrier in Russian Far East. SASCO vessels travel to virtually every port in the Asian-Pacific Region.

SASCO is a member of BIMCO (Baltic and International Maritime Council) and the National Shipping Chamber. SASCO reports that its environmental, health, and safety operations fully comply with International Management Code for Safe Operation of Ships and Pollution Prevention (ISM code) and is that it is certified and authorized by Russian Maritime Register of Shipping.

SASCO reported that it maintains a formally documented EHS management program and that it undergoes formal environmental, health, and safety (EHS) audits at least annually. These audits focus on Safety of Life at Sea (SOLAS) requirements and Dangerous Goods Authorization requirements. Emergency drills are conducted every month according to a defined plan.
Audit Methodology

This audit of Kinross as a Consignor/Transporter for its Russian Ocean Supply Chain was performed by an independent 3rd-party auditor who fulfills all ICMI Transportation Audit Team requirements and who is pre-approved by the ICMI to conduct all types of ICMC certification audits.

The assessment was a combined audit / due diligence evaluation of the ocean ports, the ocean carrier operations, and of the Kinross supply chain management practices. The audit and on-site port due diligence evaluations were conducted in June and July 2019. The remote due diligence evaluations were initiated in March 2019.

The ocean ports, ocean carrier transportation activities, and Kinross' transportation management practices, were evaluated against the ICMI International Cyanide Management Code requirements, as documented in the ICMI Cyanide Transportation ICMC Verification Protocol.

The on-site port due diligence assessments referenced in this report were performed by Kinross employees in June 2019 using ICMC assessment protocols that are designed to assess all ICMC requirements that are applicable to ports. The MSS Auditor conducted the ocean carrier due diligence assessments remotely using an ocean carrier self-evaluation protocol, the evaluation of numerous records provided by each carrier, and through electronic correspondence. The audit of Kinross as a Consignor/Transporter was conducted using multiple auditing techniques including interviews, electronic correspondence, and a review of records.

The results of this ICMC certification audit and the related due diligence reviews demonstrate that Kinross and its ocean transport management practices are in FULL COMPLIANCE with ICMI ICMC transportation requirements.
Kinross Russian Ocean Supply Chain - Auditor’s Finding

The Kinross Russian Ocean Supply Chain is:

- ☑ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance

with the ICMC requirements of the International Cyanide Management Code.

Kinross reported that the operations included in this audit have not experienced any cyanide incidents, releases, or exposures.

<table>
<thead>
<tr>
<th>Audit Company:</th>
<th>MSS Code Certification Service</th>
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<tr>
<td><a href="http://www.mss-team.com">www.mss-team.com</a></td>
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<tr>
<td>Lead / Technical Auditor:</td>
<td>Nicole Jurczyk</td>
</tr>
<tr>
<td>Date(s) of Assessment:</td>
<td>June-July 2019</td>
</tr>
</tbody>
</table>

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Certification 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 Certification Auditors.

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

Kinross Russian Ocean Supply Chain

Name of Supply Chain  Nicole Jurczyk  July 8, 2019

Signature of Lead Auditor  Date

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Kinross Russian Ocean Supply Chain

Name of Operation  Signature of Lead Auditor  Date

July 8, 2019

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Detailed Audit Results

1. TRANSPORT: Transport cyanide in a manner that minimizes the potential for accidents and releases.

Transport Practice 1.1: Select cyanide transport routes to minimize the potential for accidents and releases.

The management of Ocean Transport is: ☑ in full compliance with Transport Practice 1.1
☐ in substantial compliance
☐ not in compliance

Summary of the basis for this finding:

Kinross has implemented a process for selecting transport methods that minimizes the potential for accidents and releases or the potential impacts of accidents and releases and is in FULL COMPLIANCE with ICMC Standard of Practice 1.1.

Kinross ships its solid sodium cyanide on Russian authorized ocean carriers that meet recognized Environmental, Health, and Safety (EHS) standards and that are experienced in the handling of dangerous goods. The ocean routes are chosen by the ocean carriers. According to interviews, the ocean carriers’ abilities to fulfill ICMI Cyanide Management Code (ICMC) requirements are key considerations in the decision of which carrier to use.

The Port of Pevek is the only port that can be used to service the Kupol Mine and the Port of Arkhangelsk is also a key port in the overall transport of cyanide through the Northern Russian Seas.

Kinross performed a full evaluation of all route considerations in 2012 and updated the information in 2016. Additionally, Kinross coordinated the evaluation of each of the ocean carriers and each of the ports in the scope of this audit in 2019. Kinross also evaluates routes and all transportation options on an annual basis as part of the contracting process.

Transportation distances and travel times are minimized, according to ocean carrier contracts reviewed during this audit. No offloading of cargo at undesignated locations is allowed. The safest and quickest routing from port to port is determined by the vessel according to local weather and operational conditions.
Transport Practice 1.2: Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

The management of Ocean Transport is: ☑ in full compliance with Transport Practice 1.2
☐ in substantial compliance
☐ not in compliance

Summary of the basis for this finding:

Kinross ensures that its transportation partners use only trained, qualified and licensed (where required) operators and is in FULL COMPLIANCE with ICMC Standard of Practice 1.2.

Kinross performs due diligence evaluations to ensure that its Ocean carriers and ports operate according to recognized EHS standards and are experienced in the handling of hazardous goods. Due Diligence evaluations were available for both ocean carriers and both ports in the scope of this certification.

According to the responses to a questionnaire modeled after the ICMC Transportation Protocol, both ocean carriers reported that they comply with International Maritime Organization (IMO) requirements and are in compliance with International Maritime Dangerous Goods (IMDG) and Safety of Life at Sea (SOLAS) requirements concerning the transportation of the hazardous materials, general ocean operations, emergency response, and the training of employees.

Ocean carriers self-reported to Kinross that they train their personnel on hazardous materials handling. Information, Emergency Plans, Certificates of Compliance, and other records submitted from the carriers was reviewed during this audit. Information submitted included program descriptions and third-party certificates. This was deemed to be enough evidence to conclude that operations are performed by appropriately licensed, authorized, and qualified personnel.

On-site Due Diligence reviews performed by Kinross personnel in 2019 at each port confirmed that training programs in place at each location are acceptable. The transportation of dangerous goods and the shipping industry in general are highly regulated activities in Russia. Strict training requirements exist for all personnel engaged in the transport of dangerous good and the operation of a shipping vessel in Russian waters.
Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.

The management of Ocean Transport is: ✓ in full compliance with Transport Practice 1.3
☐ in substantial compliance
☐ not in compliance

Summary of the basis for this finding:

Kinross only uses supply chain partners with equipment designed and maintained to operate within the loads it is handling and is in FULL COMPLIANCE with ICMC Standard of Practice 1.3.

Kinross performs due diligence evaluations to ensure that its Ocean carriers and ports are experienced in the handling of hazardous goods and that they use appropriate equipment to transport and handle the cyanide. Due Diligence evaluations were available for both ocean carriers and both ports in the scope of this certification. Kinross contracts with the ocean carriers detail the ship capabilities that are required as well as the weight capacities of the ships and cranes.

Kinross has contractual agreements with its ocean carriers that require that they comply with all applicable regulations, including Safety of Life at Sea (SOLAS) regulations. Contracts were reviewed during the audit and were found to be acceptable. Part of the SOLAS regulatory auditing processes address the use of safe and appropriate equipment.

On-site Due Diligence reviews performed by Kinross personnel in 2019 at each port confirmed that equipment at each location is acceptable and is fully capable of operating safely with regards to the loads that must be managed.
**Practice 1.4:** Develop and implement a safety program for transport of cyanide.

The management of Ocean Transport is:
- ✔️ in full compliance with Transport Practice 1.4
- ☐ in substantial compliance
- ☐ not in compliance

**Summary of the basis for this finding:**

Kinross only uses transport partners that have developed and implemented a formal safety program that is used for the transport of dangerous goods, including cyanide and is in FULL COMPLIANCE with ICMC Standard of Practice 1.4.

Kinross performs due diligence evaluations to ensure that its Ocean carriers and ports are properly authorized to handle and transport cyanide. Due Diligence Part of the dangerous goods authorization process under international and Russian regulations mandates that multiple safety protocols, plans, and programs be in place. Ocean carriers self-reported to Kinross that they train their personnel on hazardous materials handling.

Ocean carriers also submitted spill response plans and general safety plans for review. All information was found to be acceptable. Each ocean carrier reported that they have a strict zero tolerance drug and alcohol policy in place and that random drug testing is performed. All personnel are trained in safe handling practices. Formal stowage plans are utilized, and ocean carriers reported that they isolate cyanide as much as possible from other hazardous materials to ensure the safety of the voyage.

On-site Due Diligence reviews performed by Kinross personnel in 2019 at each port confirmed that safety programs are in place at each location that they are aligned with ICMI requirements. Kinross concluded that the results of the evaluations were acceptable and that the ports are fully capable of operating safely with regards to the loads that must be managed.
Transport Practice 1.5: Follow international standards for transportation of cyanide by sea and air.

The management of Ocean Transport is: ☑ in full compliance with Transport Practice 1.5
☐ in substantial compliance
☐ not in compliance

Summary of the basis for this finding:

Kinross transports shipments of cyanide by sea in compliance with the Dangerous Goods Code of the International Maritime Organization and is in FULL COMPLIANCE with ICMC Standard of Practice 1.5. Cyanide is not shipped by air.

Kinross ships its sodium cyanide on ocean carriers that have demonstrated safety programs and safe performance. The ocean carriers have sign standard contractual agreements that require that the carrier adhere to applicable regulations and have recognized environmental, health, and safety programs.

Each ocean carrier reported information regarding fulfillment of requirements using a customized ICMC transportation protocol. Responses and information provided by all carriers was deemed to be appropriate during this audit process.

The ocean routes are chosen by the ocean carriers. Ports that are not already included in ICMC-certified supply chains are evaluated via an on-site Due Diligence evaluation. Records were available during the audit to demonstrate that both ports within the supply chain had undergone such an on-site evaluation and had been found to be compliant with ICMC Due Diligence requirements.

Kinross confirmed through its Due Diligence assessment that each of the Ocean Carriers involved in this supply chain uses detailed stowage plans for the placement and safe transportation of all hazardous materials, including sodium cyanide shipments.

Kinross confirmed through its Due Diligence assessment that each of the Ocean Carriers involved in this supply chain have cyanide emergency response information available on board each vessel.
**Transport Practice 1.6:** Track cyanide shipments to prevent losses during transport.

The management of Ocean Transport is: 
- ☑ in full compliance with Transport Practice 1.6
- ☐ in substantial compliance
- ☐ not in compliance

**Summary of the basis for this finding:**

Kinross ensures that cyanide shipments are tracked to prevent loss during transport and is in FULL COMPLIANCE with the ICMC Standard of Practice 1.6.

Kinross ships its sodium cyanide on ocean carriers that have demonstrated shipment tracking capabilities. Interviews confirmed that there are personnel at the ocean carriers and at Kinross who have designated responsibilities for knowing when cyanide ships and how the shipment is progressing. Due to regulatory and contractual requirements, there is limited time to offload the vessels when they arrive into the Port of Pevek. Multiple organizations, including the police and local authorities need to be involved in the offloading process and transport to the storage facility. The tracking of shipments and planning for the offloading of the cyanide are therefore critical parts of the overall transport of cyanide to the Kupol Mine.

Ocean carriers reported that they have computer systems that are used for the tracking and management of all freight containers within their system. The management systems provide among other items the date, time, location, and carrier involved in the last interchange, transport action, or gate move. Kinross has access to this information via the internet web sites. Kinross can also request this information at any time.

The sodium cyanide shipments for this segment are containerized loads of bag-in-box packages. All shipping containers are sealed. This enables personnel along any portion of the segment to confirm that the containers have not been opened.
2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.

Transport Practice 2.1: Store cyanide in a manner that minimizes the potential for accidental releases.

The management of Ocean Transport is: ☑ in full compliance with Transport Practice 2.1
☐ in substantial compliance
☐ not in compliance

Summary of the basis for this finding:

Kinross ensures that interim storage facilities are safe, secure, and that the risk of experiencing releases and/or exposures is minimized. Kinross is in FULL COMPLIANCE with the ICMC Standard of Practice 2.1.

The only interim storage location in this supply chain is the Port of Arkhangelsk. The evaluation of the KM 21 interim storage location outside of the Port of Pevek is included in the CMGC supply chain certification report.

Records from the on-site evaluation of the Port of Arkhangelsk was performed by Kinross personnel in June 2019 were reviewed during this audit. Confirmation was made that cyanide is stored on concrete and that secondary containment is in place. Sea containers had the proper UN placarding and warnings correctly placed. The assessor concluded that cyanide storage best practices were in place, including the isolation of the cyanide from incompatible materials. The sea containers remain sealed and are not opened while at the port.

Confirmation was also made that all security measures at the port are acceptable. The port is completely fenced and there is limited access to authorized personnel only. Cargo is carefully manifested and tracked as it is put into storage and/or loaded onto an ocean vessel.
3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities

Transport Practice 3.1: Prepare detailed emergency response plans for potential cyanide releases.

The management of Ocean Transport is:
- ☑ in full compliance with Transport Practice 3.1
- □ in substantial compliance
- □ not in compliance

Summary of the basis for this finding:

Kinross ensures that its transportation partners maintain emergency response plans and capabilities to ensure the protection of communities and the environment and is in FULL COMPLIANCE with ICMC Standard of Practice 3.1.

Ocean carriers reported that they and their affiliates have emergency response plans in place which include the prompt notification of all involved parties. Kinross provides shipping papers showing the emergency contact information which is then transferred to the hazardous cargo declaration. Emergency response plans, including spill response plans were submitted for review and were found to be acceptable.

The due diligence questionnaire responses from the ocean carriers confirmed their understanding of emergency response requirements. Emergency response planning and the performance of frequent emergency drills are required by international laws.

Ocean Carriers reported that they perform drills regularly at frequencies ranging between 1-3 months. The records from these drills are reviewed annually as part of the SOLAS auditing process.

The ocean carriers provided information demonstrating that they are certified by third-party auditing organizations for environmental, health, and/or safety programs. Ocean carrier responses confirmed that emergency response planning is an integral part of these programs.

On-site Due Diligence reviews performed by Kinross personnel in 2019 at each port confirmed that emergency response programs are in place at each location that they are aligned with ICMI requirements. Kinross concluded that the results of the evaluations were acceptable and that the ports are operating in a manner that is protective of the environment and the communities in which they exist.
**Transport Practice 3.2:** Designate appropriate response personnel and commit necessary resources for emergency response.

The management of Ocean Transport is:
- ✔ in full compliance with Transport Practice 3.2
- □ in substantial compliance
- □ not in compliance

**Summary of the basis for this finding:**

Kinross ensures that its transportation partners have designated personnel and resource capability for responding to emergencies and is in FULL COMPLIANCE with ICMC Standard of Practice 3.2.

Ocean carriers responded that they contract with professional emergency response contractors for landside emergencies. Onboard vessels, the emergency response would be conducted by trained crew members with shore side support and guidance.

Emergency response planning information reviewed for the ocean carriers was found to be appropriate.

On-site Due Diligence reviews performed by Kinross personnel in 2019 at each port confirmed that designated response personnel are named for each location and that resources and response organizations are available to respond to emergencies in the ports. Emergency equipment was evaluated at each port and was found to be appropriate. Kinross concluded that the results of the evaluations were acceptable and that the ports have the necessary personnel and resources available to respond to an emergency.
Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

The management of Ocean Transport is:

☑ in full compliance with Transport Practice 3.3
☐ in substantial compliance
☐ not in compliance

Summary of the basis for this finding:

Kinross ensures that its transportation partners have procedures and systems in place for proper notifications to be made in the event of an emergency and is in FULL COMPLIANCE with ICMC Standard of Practice 3.3.

Ocean carriers reported that they and their affiliates have emergency response plans in place which include the prompt notification of all involved parties. Kinross provides shipping papers showing the emergency contact information which is then transferred to the hazardous cargo declaration.

The due diligence questionnaire responses from the ocean carriers confirmed their understanding of emergency response requirements. Emergency response planning and the performance of frequent emergency drills are required by international laws. All of the ocean carriers responded that they are certified by third-party auditing organizations for environmental, health, and/or safety programs. Ocean carrier responses confirmed that emergency response planning is an integral part of these programs.

On-site Due Diligence reviews performed by Kinross personnel in June 2019 at each port confirmed that emergency planning information includes that necessary contact numbers and that emergency plans call for the notification of all parties in the event of an emergency. Kinross concluded that the results of the evaluations were acceptable and that the ports have the necessary notification systems and procedures in place to fulfill all ICMC requirements.
Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

The management of Ocean Transport is: ☑ in full compliance with Transport Practice 3.4
☐ in substantial compliance
☐ not in compliance

Summary of the basis for this finding:

Kinross ensures that its transportation partners have procedures in place to appropriately respond to a cyanide spill and is in FULL COMPLIANCE with ICMC Standard of Practice 3.4.

Ocean carrier responses confirmed that they would communicate with Kinross cyanide experts in the event of a spill. The response to a spill at sea or in a port is managed according to international regulations.

On-site Due Diligence reviews performed by Kinross personnel in June 2019 at each port confirmed that emergency response procedures and policies were appropriate for the port. Kinross concluded that the results of the evaluations were acceptable and that the ports have the necessary access to external resources who would respond appropriately to a cyanide spill in accordance with local regulations.
Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.

The management of Ocean Transport is: ☑ in full compliance with Transport Practice 3.5
☐ in substantial compliance
☐ not in compliance

Summary of the basis for this finding:

Kinross ensures that its transportation partners perform regular emergency response drills and is in FULL COMPLIANCE with ICMC Standard of Practice 3.5.

The due diligence questionnaire responses from the ocean carriers confirmed their understanding of emergency response requirements. Emergency response planning and the performance of frequent emergency drills are required by international laws. The ocean carriers provided information demonstrating that they are certified by third-party auditing organizations for environmental, health, and/or safety programs. Ocean carrier responses confirmed that emergency response planning is an integral part of these programs. Emergency response drills are reportedly conducted at a frequency of between 1-3 months for each ocean carrier.

On-site Due Diligence reviews performed by Kinross personnel in June 2019 at each port confirmed that emergency response drills are conducted at each port. Records were available during the evaluations to confirm this. Kinross concluded that the results of the evaluations were acceptable and that the ports are conducting (or participating in) emergency response drills, as required by the Code.

The emergency response at the Port of Pevek is performed by external groups, such as the Pevek Fire Brigade and the Transportation Police. The transportation group (CMGC), based at the KM21 interim storage facility, may also provide emergency response support for any cyanide incident at the Port of Pevek. Such a response would be at the direction of the Pevek Fire Brigade. The 2017 re-certification audit of CMGC confirmed that emergency drills are being conducted, as required.