ICMI International Cyanide Management Code

Summary Audit Report

Kinross Gold Corporation

Russian Rail Supply Chain

2019 Certification Audit
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Kinross Russian Rail Supply Chain Summary

Company Name & Contact Information

| Name of Operation: | Kinross Gold Corporation  
Kinross Far East LLC  
11/13 Proletarskaya Street  
Magadan, Russia, 685000 |
|------------------|--------------------------------------------------|
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Vice President EHS Russia at Kinross Gold Corporation  
Email: Alexander.Cherdantsev @ Kinross.com |

Kinross Russian Rail Supply Chain Description & Scope of Certification

Kinross Gold Corporation global headquarters are in Toronto, Canada and the company operates mining projects globally. The Kinross Far East LLC organization with headquarters in Magadan, Russia manages this Russian Rail Supply Chain. This supply chain is used together with the Kinross Russian Ocean Supply Chain to provide the Kupol Mine with cyanide.

The Kinross Russian Rail Supply Chain includes the transport of solid sodium cyanide from the Russian International Cyanide Management Code Signatory producer named Closed Joint Stock Company Korund-CN (Korund). The cyanide is packaged in a 1-ton bag-in-box configuration and shipped in intermodal containers. The wood boxes are certified according to UN Regulations. The boxes have a polymer liner. The cargo may also be packaged in steel drums with gross weight of 50 kg.

Korund contracts with a Russian intermodal container operator and agent of the Russian Railways named PJSC TransContainer (TransContainer) to ensure that the cyanide is properly managed and tracked throughout the transportation from Korund to the Port of Arkhangelsk. Rolling rail stock is provided by TransContainer. Korund loads the cyanide directly into the Russian Railways network within their facility boundary. Additionally, a Korund escort accompanies the cargo from the production facility to the Port of Arkhangelsk, as per Russian regulation.

Components of the overall transportation system from producer to Kupol Mine that are already part of an International Cyanide Management Code (ICMC) certified supply chain or those that are part of another Kinross supply chain are mentioned in table on page 4 of this report, but they
are not included in the Kinross Russian Rail 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 the rail at the point of entry into the rail network (Kupol facility). 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 Rail Supply Chain
- Kinross Russian Ocean Supply Chain

This certification audit report addresses the Kinross Rail Supply Chain. The Kinross Russian Ocean 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 during life cycle stages of cyanide procurement, transportation, use, and post-process management. A due diligence review was performed for the Russian Railways through the involvement of Korund and TransContainer personnel.

This Kinross Russian Rail Supply Chain includes the use of the Russian Railways from Korund, located in Dzerzhinsk, Russia to the Port of Arkhangelsk. The port is included in this report for ease of use. The Port of Arkhangelsk information is also part of the Kinross Russian Ocean Supply Chain certification report.
Blue Shading in the table below indicates that this transportation segment is within scope of this Supply Chain Certification.

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<tr>
<th>Transportation Segment Start Point</th>
<th>Transportation Segment End Point</th>
<th>Supply Chain / Company</th>
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<td>Hebei Chengxin Co., Ltd., P.R. China – Certified Producer</td>
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<td>Hebei Global Ocean Supply Chain</td>
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<td>Ports of Qindao and Lianyungang, China</td>
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<td>Kinross - Chukotka Mining and Geological Company (CMGC) Transportation Group</td>
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<td>Closed Joint Stock Company Korund-CN, Russia</td>
<td>Port of Arkhangelsk</td>
<td>Kinross Russian Rail Supply Chain</td>
<td>On- and Off-site Due Diligence Assessment during this audit process</td>
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<tr>
<td>Port of Arkhangelsk</td>
<td>Port of Pevek</td>
<td>Kinross Russian Ocean Supply Chain</td>
<td>On- and Off-site Due Diligence Assessment during a concurrent audit process Results are posted in separate report entitled: Kinross Russian Ocean Supply Chain</td>
</tr>
</tbody>
</table>
**Russian Railways**

The JSC Russian Railways company was formed in 2003 when the Russian Federation implemented legislation that led to the privatization of property. The railway is owned completely by the Russian Federation. With over 85 thousand kilometers of rail and over 735 thousand employees, Russian Railways is one of the largest transportation companies in the world and one of the biggest “companies” in Russia. Rail transport of cargo is a key mode of delivery in Russia, especially due to the remote harsh and sparsely populated regions of the country.

The option to transport cyanide by rail as part of the transportation system used for the Kupol Mine became available in August 2014 under the Rules of Dangerous Goods Transportation by Rail through joint efforts of Korund-CN, TransContainer, and the Department of Commercial Activities and Regulatory Compliance. This transport mode complies with the UN recommendations on the transportation of dangerous goods, International Maritime Dangerous Goods Code (IMDG), and European Agreement concerning the International Carriage of Dangerous Goods by Rail (RID).

The Rules of Dangerous Goods Transportation by Rail in Russia allow the transportation of dangerous goods in privately owned intermodal containers. The transport of dangerous goods by rail is strictly regulated and there must be an escort from the consignor or consignee who travels with the cargo at all times. Korund, the manufacturer, escorts the cargo to Arkhangelsk.

The railway reported that their operations are in strict compliance with all applicable regulations. In addition to the railway reported that it also complies with the regulatory amendment that specifically addresses the transport of solid sodium cyanide (UN number 1689, hazard class 6.1, AK 619).

The railway reported that since the start of cyanide transport by rail in 2014 that there have been no spills, human exposures, or environmental impact from the transport of this cargo.
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.
Audit Methodology

This audit of Kinross as a Consignor/Transporter for its Russian Rail 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 Russian Railways, the Port of Arkhangalsk, and of the Kinross supply chain management practices. The audit was conducted in July 2019. The due diligence evaluations were initiated in June 2019.

The rail operations, port operations, 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 due diligence assessment of the Russian Railways and TransContainer (agent for the Russian Railways) referenced in this report was performed by Kinross employees in June 2019 using an ICMC assessment protocol that is designed to assess all ICMC requirements that are applicable to rail transportation. 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 Russian rail transport management practices are in FULL COMPLIANCE with ICMI ICMC transportation requirements.
Kinross Russian Rail Supply Chain - Auditor’s Finding

The Kinross Russian Rail 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 <a href="http://www.mss-team.com">www.mss-team.com</a></th>
</tr>
</thead>
<tbody>
<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 Rail Supply Chain July 18, 2019
Name of Supply Chain Signature of Lead Auditor Date
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 purchases its cyanide from ICMC-certified producers, one of which is the Closed Joint Stock Company Korund-CN (Korund), located in Russia. Kinross worked closely with Korund, TransContainer (agent for the Russian Railways), and the Department of Commercial Activities and Regulatory Compliance in 2014 to establish a via routing for cyanide from Korund to the Kupol Mine.

The routing of the shipments from Korund via rail to the Port of Arkhangelsk, by ocean carrier to the Port of Pevek, and by truck using an ICMC-certified ground transportation company to interim storage and then the mine is the most direct route possible. Authorities were involved in the designation of the route and the provision of necessary approvals.

According to records reviewed, Kinross performed a full evaluation of all route considerations in 2012 and updated the information in 2016. Additionally, Kinross coordinated the evaluation of the rail and port 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.
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 rail, ocean, and truck transportation partners operate according to recognized EHS standards and are experienced in the handling of hazardous goods. Due Diligence evaluations were available for the Russian Railways (including the agent TransContainer) and the Port of Arkhangelsk.

According to the Kinross Due Diligence evaluation using a questionnaire modeled after the ICMC Transportation Protocol, the rail company complies with governmental requirements concerning the transportation of the hazardous materials, general rail operations, emergency response, and the training of employees.

A Due Diligence review performed by Kinross personnel in 2019 of the rail and the port confirmed that transportation of dangerous goods and the shipping industry in general are highly regulated activities in Russia and that strict training requirements exist for all personnel engaged in the transport of dangerous goods. Korund personnel who manage the escort of the rail shipments confirmed this information through the Due Diligence evaluation process.
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

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 transportation partners 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 the Russian Railways and the Port of Arkhangelsk.

A Due Diligence review performed by Kinross personnel in 2019 confirmed that transportation of dangerous goods and the shipping industry in general are highly regulated activities in Russia and that strict training requirements exist for all equipment that is used for the transport of dangerous goods. Korund personnel who manage the escort of the rail shipments confirmed this information through the Due Diligence evaluation process.

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

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 transportation partners 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.

Korund personnel who manage the escort of the rail shipments confirmed that the safety program at the rail company is appropriate. Confirmation was made that there is a drug and alcohol testing program in place and that there are limits on the hours that employees can work each day. There is a reported zero tolerance drug and alcohol policy in place and that random drug testing is performed. All personnel are trained in safe handling practices.

A Due Diligence review performed by Kinross personnel in 2019 confirmed that safety programs are in place at the rail and the port and that they are aligned with ICMI requirements. Kinross concluded that the results of the evaluations were acceptable and that the rail company and the port are fully capable of operating safely and securely.

*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.

Korund reported that its packaging and labeling has been reviewed and approved for ocean transport of cyanide and that all IMDG regulations for the shipment of dangerous goods by ocean carrier are fulfilled. Photos of the packaging and labels were submitted for review and were found to be appropriate.

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. The results of the due diligence evaluations for ocean carriers are contained within the Kinross Russian Ocean Supply Chain audit report.
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.

The shipments from Korund by rail are fully escorted by Korund personnel. Confirmation was made that access to cargo is strictly limited to authorized personnel and the chain of custody documentation is managed very strictly by the agents involved in the transport. The status of shipments and location of cargo are reportedly traceable at all times.

The management systems in place 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. Korund reported that confirmation is made at every interchange that the seals are still intact. 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 interim storage locations in this supply chain is the Port of Arkhangelsk. The due diligence of the rail transport confirmed that rail yards along the route are secure and that access to cargo is strictly limited to authorized personnel. 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.

Confirmation was made during the Due Diligence evaluation that Korund emergency response procedures address the potential need for emergency response during transit by rail. Korund personnel reported that the relevant emergency response plan is valid for 2 years and that it was last updated in December 12, 2018. Additionally, the agent for Russian Railways, TransContainer, reported that the emergency containment procedure which regulates dangerous goods carriage by rail is provided in the document entitled Transport Emergency Cards for Dangerous Goods carried by Rail in CIS.

A Due Diligence review performed by Kinross personnel in 2019 confirmed that emergency response programs are in place for the supply chain partners and that they are aligned with ICMI requirements. Kinross concluded that the results of the evaluations were acceptable and that the rail is operating in a manner that is protective of the environment and the communities in which it operates.

*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 Russian Rail Supply Chain
Name of Operation
Signature of Lead Auditor
July 18, 2019
Date
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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.

Kupol personnel reported that Emergency Response is provided by a paramilitary team, which is certified for emergency response and rescue actions at chemical hazardous facilities. During transport each road consignment must be accompanied by a responsible person knowledgeable on the chemical properties of the cargo and how to respond in the event of an emergency. The approved transportation plan includes emergency procedures that describes immediate response by persons accompanying the consignment and contact information for the Ministry of Internal Affairs and Ministry of Emergency Situations.

As per ERP the Dzerzhinsk emergency services (as a branch of Federal Ministry of Emergency Situations) participate in emergency responses. The Emergency Response Plan (ERP) discusses the roles of others outside of rail yard personnel who are involved in responding to fire, medical, or spill emergencies. Contact information is kept up-to-date and revised as necessary.

A Due Diligence review performed by Kinross personnel in 2019 confirmed that designated response personnel are named for each location and that resources and response organizations are available to respond to emergencies. Emergency equipment was evaluated and was found to be appropriate. Kinross concluded that the results of the evaluations were acceptable and that the rail and the port 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.

Korund reported that they have emergency response plans in place which include the prompt notification of all involved parties. This is possible because a Korund employee escorts the cargo during the transport. Kinross provides shipping papers showing the emergency contact information which is then transferred to the hazardous cargo declaration.

Due Diligence reviews performed by Kinross personnel in June 2019 at the rail and 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 rail and port 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.

Korund personnel responsible for the escort of the cargo reported that they would communicate with Kinross and authorities in the event of a spill. The response to a spill is managed according to Russian regulations by authorities.

Due Diligence reviews performed by Kinross personnel in June 2019 for the rail and port confirmed that emergency response procedures and policies were appropriate. Kinross concluded that the results of the evaluations were acceptable and that the rail and port 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.

Emergency response planning and the performance of frequent emergency drills are required by Russian regulations. Korund responsible for the escort of the cargo during transport reported that spill drills are performed annually and that the last spill drill was conducted in May 2019.

Due Diligence reviews performed by Kinross personnel in June 2019 for the rail and port confirmed that emergency response drills are conducted at regular intervals. Kinross concluded that the results of the evaluations were acceptable and that the rail and ports are conducting (or participating in) emergency response drills, in alignment with Cyanide Code requirements.