



GISTM Principle 15 – August 2025 Public Disclosure

Cullaton Lake Tailings Pond 1

5 August 2025

FACILITY LEVEL STATEMENT OF CONFORMANCE¹

The Cullaton Lake Tailings Pond 1 (TP1) is in Partial Conformance with the GISTM. The site is closed with a low risk to people and the environment. It is located in a remote area with no road access and the closest community is more than 200 km from the site. Work is planned to achieve Full conformance by 2029, including community engagement, studies to update the knowledge base, risk assessment, downstream impact assessment, engineering evaluations, design documentation, operational documentation and emergency response plans.

PRINCIPLE 15

Publicly disclose and provide access to information about the tailings facility to support public accountability.

REQUIREMENT 15.1

A. For new tailings facilities for which the regulatory authorisation process has commenced, or that are otherwise approved by the Operator, the Operator shall publish and update, in accordance with Principle 21 of the UNGP, the following information:

Requirement 15.1 A is not applicable as this is an existing facility.

B. For each existing tailings facility and in accordance with Principle 21 of the UNGP, the Operator shall publish and update at least on an annual basis, the following information:

1. A description of the tailings facility (information may be obtained from the output of Requirements 5.5 and 6.4)

TP1 is a closed facility owned by Barrick Gold Inc, a subsidiary of Barrick Mining Corporation, located in the southern part of the Kivalliq Region, Nunavut. The facility was operated from 1981 to 1985 and contains approximately 190 000 m³ of tailings. The mine was placed in care and maintenance in 1985 and subsequently closed in 1990. By 1992, the site had entered the final stage of decommissioning. At closure the dike crest and spillway were lowered, the dike slope flattened and a soil cover was placed on the exposed tailings beach. The overburden material within the tailings area was then graded, seeded, and fertilized.

¹ **Facility-Level Conformance Definitions:**

- **Full Conformance:** All applicable requirements are met in full; or, all applicable requirements are met but the facility requires remedial works to conform to specific requirements (e.g. 4.7 or 5.7), for which basic engineering is complete, budgeted, and a construction schedule has been developed and approved by the Accountable Executive to complete remedial works as soon as reasonably practicable.
- **Partial Conformance:** Some requirements are fully met, others are partially met or not met.
- **Non-Conformance:** No applicable requirements are either partially or fully met

The facility has a surface area of 17.8 ha and is delimited by a 4 m high earthfill embankment built in a single lift. Tailings are stored either under a water cover or beneath a soil cover placed on the tailings beach. The estimated thickness of tailings ~~at~~ⁱⁿ the beach is 1.2 m, and in the pond, it is less than 0.5 m. TP1 is a flow-through system with a spillway discharging into a decommissioned polishing pond located 300 m downstream and then off-site.

2. The Consequence Classification (Requirement 4.1)

Facility Consequence Classification

Current Classification	Classification used for Design
Significant (GISTM 2020)	To be determined

3. A summary of risk assessment findings relevant to the tailings facility (Information may be obtained from the output of Requirement 10.1)

A potential failure mode (PFM) analysis was completed in 2024 for the facility. No PFMs warranting immediate attention were identified during the workshop. Gaps in the knowledge base were identified and will be resolved before further risk assessments are completed.

4. A summary of impact assessments and of human exposure and vulnerability to tailings facility credible flow failure scenarios (Information may be obtained from the output of Requirements 2.4 and 3.3)

A dam breach and inundation study is not available for TP1. The site is located in a remote area with no road access and the closest community is more than 200 km from the site.

5. A description of the design for all phases of the tailings facility lifecycle including the current and final height (Information may be obtained from the output of Requirement 5.5)

TP1 is an unlined sidehill facility, consisting of a homogeneous earthfill embankment with a spillway. The embankment is 4 m high and was built in a single lift using glacial till. The embankment foundation is composed of shallow till overlying bedrock. Rockfill was placed as an erosion protection layer on the crest and slope. The area features undulating terrain with shallow surficial soils overlying bedrock. Bedrock consists of Precambrian aged volcano-clastic rocks. The surficial deposits consist mainly of a bouldery glacial till with localized surface organic deposits. The soil matrix of the glacial till is a well-graded, silty sand with no clay to traces of clay,

The spillway of TP1 is excavated within the embankment and is lined with geotextile and rockfill. The spillways is designed to convey the 1/100 year flood event. At closure the dike

crest slope was flattened to increase stability. The table below summarizes the stages of construction.

Cullaton Lake TP1 Construction

Structure	Date	Height (m)
TP1 Embankment Construction	1981	7
TP1 Regrading (closure)	1991	4

6. A summary of material² findings of annual performance reviews and dam safety review (DSR), including implementation of mitigation measures to reduce risk to ALARP (Information may be obtained from output of Requirements 10.4 and 10.5)

Reference	Material Findings Summary	Mitigation Measures to Meet ALARP
2016 DSR ³	No material findings	None
2024 DSI ⁴	No material findings	None

7. A summary of material⁵ findings of the environmental and social monitoring programme including implementation of mitigation measures (Requirement 7.5)

There are no material incidents or findings from the environmental and social monitoring program.

² Material findings are findings that have a high probability of becoming or actual dam safety issues that require immediate attention and are considered immediately dangerous to life, health or the environment, a significant regulatory enforcement.

³ DSR: Dam Safety Review

⁴ DSI: Dam Safety Inspection

⁵ An incident is considered material if it:

- a) Causes significant negative impact on human health or the environment;
- b) Extends onto publicly accessible land and has the potential to cause significant adverse impact to surrounding communities, livestock or wildlife;
- c) Results in a breach of license conditions, the convention between the mine and government, or a violation of environmental regulations and standards or constitute releases above Reportable Quantities (RQs) any of which is immediately reportable to the government by law or other statute; or
- d) Results in a release of cyanide (above 0.5 mg/l of WAD cyanide, confirmed by a certified third-party laboratory as above detection limit) to any surface water that leaves the site boundaries or any groundwater aquifer (whether on or off-site).

8. A summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow failure event that:

- **Is informed by credible flow failure scenarios from the tailings facility breach analysis;**
- **Includes emergency response measures that apply to project affected people as identified through the tailings facility breach analysis and involve cooperation with public sector agencies; and**
- **Excludes details of emergency preparedness measures that apply to the Operator's assets, or confidential information (Requirements 13.1 and 13.2).**

TP1 does not have an EPRP due to the remote location and lack of populations or infrastructure downstream.

9. Dates of most recent and next independent reviews (Requirement 10.5)

Dates of Independent Reviews

	Latest Review	Previous Review
Independent Tailings Review Board (ITRB)	None	None
Dam Safety Review (DSR)	July 2016	None

10. Annual confirmation that the Operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs of planned closure, early closure, reclamation, and post-closure of the tailings facility and its appurtenant structures (Requirement 10.7)

Barrick has sufficient financial resources to meet its business requirements for the foreseeable future, including capital expenditures, working capital requirements, interest payments, environmental rehabilitation, securities buyback and dividends.

For additional information refer to Barrick Annual Report 'Financial Position and Liquidity' (page 97) and 'Contractual Obligations and Commitments' table (page 99).

[Barrick Annual Report](#)

C. Provide local authorities and emergency services with sufficient information derived from the breach analysis to enable effective disaster management planning (Information may be obtained from the output of Requirement 2.3).

TP1 does not have an EPRP due to the remote location and lack of population or infrastructure downstream.

REQUIREMENT 15.2

Respond in a systematic and timely manner to requests from interested and affected *stakeholders* for additional information *material* to the public safety and integrity of a *tailings facility*. When the request for information is denied, provide an explanation to the requesting *stakeholder*.

Barrick is committed to the timely response to requests for additional information material to the public safety and integrity of their TSFs from interested and affected stakeholders. In the event that specific information cannot be shared with the requesting stakeholder, an explanation will be provided. Information on Barrick's Tailings Management policy and our Social Performance Policy can be found at the following links:

[Tailings Management Policy](#)

[Social Performance Policy](#)

REQUIREMENT 15.3

Commit to cooperate in credible global transparency initiatives to create standardised, independent, industry-wide and publicly accessible databases, inventories or other information repositories about the safety and integrity of *tailings facilities*.

Barrick is committed to global transparency around the public safety and integrity of our TSFs. A link to Barrick's Tailings Management Policy can be found here.

[Tailings Management Policy](#)

CAUTIONARY STATEMENT ON FORWARD-LOOKING INFORMATION

Certain information contained in Barrick's Global Industry Standard on Tailings Management ("GISTM") tailings disclosure ("GISTM Disclosure"), including any information as to the design and operation of Barrick's tailings facilities and Barrick's sustainability strategy and vision, projects, plans or future technical, or operating performance constitutes "forward-looking statements". All statements, other than statements of historical fact, are forward-looking statements. The words "target", "plan", "project", "develop", "estimate", "potential", "may", "will", "likely", "unlikely", "can", "could", "would" and similar expressions identify forward-looking statements. In particular, this GISTM Disclosure contains forward-looking statements including, without limitation, with respect to: the results of Barrick's annual performance and dam safety reviews and related mitigation measures for the Cullaton Lake Tailings Pond #1 ("Cullaton TP1"); the potential environmental and social impacts of Cullaton Lake TP1 and related monitoring and risk assessments; the results of Barrick's tailings facility breach analysis and inundation studies including human exposure and vulnerability to flow failure scenarios, disaster management planning and emergency preparedness; and estimated costs associated with Cullaton Lake TP1.

Forward-looking statements are necessarily based upon a number of estimates and assumptions that, while considered reasonable by the company as at the date of this Response in light of management's experience and perception of current conditions and expected developments, are inherently subject to significant business, economic and competitive uncertainties and contingencies. Known and unknown factors could cause actual results to differ materially from those projected in the forward-looking statements and undue reliance should not be placed on such statements and information. Such factors include, but are not limited to: operating or technical difficulties in connection with mining or development activities, including geotechnical challenges, tailings dam and storage facilities failures, including closed storage facility failures; physical and transition risks related to climate change, including extreme weather events and resource shortages; risk of loss due to acts of war, terrorism, sabotage and civil disturbances; changes in national and local government legislation, taxation, controls or regulations and/or changes in the administration of laws, policies and practice; political or economic development in Nunavut, Canada, or other provinces and countries in which Barrick does or may carry on business in the future; timing of receipt of, or failure to comply with, necessary permits and approvals; our ability to maintain relationships with public sector agencies and the communities surrounding the Cullaton Lake TP1; contests over access to water, power and other required infrastructure; and disruptions in the maintenance or provision of required infrastructure and information technology systems. In addition, there are risks and hazards associated with the business of mineral exploration, development, and mining, including environmental hazards, industrial accidents, unusual or unexpected formations, pressures, cave-ins and flooding. Many of these uncertainties and contingencies can affect our actual results and could cause actual results to differ materially from those expressed or implied in any forward-looking statements made by, or on behalf of, Barrick. Readers are cautioned that forward-looking statements are not guarantees of future performance.

All of the forward-looking statements made in this GISTM Disclosure are qualified by these cautionary statements. Specific reference is made to the most recent Form 40-F/Annual Information Form on file with the SEC and Canadian provincial securities regulatory authorities for a discussion of some of the factors underlying forward-looking statements and the risks that may affect Barrick's ability to achieve the expectations set forth in the forward-looking statements contained in this Response.

Barrick disclaims any intention or obligation to update or revise any forward-looking statements whether as a result of new information, future events or otherwise, except as required by applicable law.