



GISTM Principle 15 – August 2025 Public Disclosure

Golden Sunlight Mines
Golden Sunlight TSF-1

5 August 2025

FACILITY LEVEL STATEMENT OF CONFORMANCE¹

The Golden Sunlight Tailings Storage Facility 1 is in Partial Conformance with the GISTM. The facility is closed and fully drained with a very low risk to people and the environment. Work is planned and ongoing to achieve Full Conformance by 2026, including the completion of a Dam Safety Review (DSR).

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)

Golden Sunlight Mines is a wholly owned subsidiary of Barrick Mining Corporation (Barrick) and owns and operates Tailing Storage Facility 1 (TSF-1). TSF-1 is an existing facility, located at the Golden Sunlight Mine, approximately 7 miles east of Whitehall, Montana.

Golden Sunlight Mine TSF-1 is described by the following details:

- **Facility Operational Status:** Tailings deposition into TSF-1 ceased at the end 1993, and all tailings were subsequently routed to the adjoining TSF-2 impoundment beginning in early 1994. Placement of the TSF-1 impoundment cover began in 1996 and completed in 2001. Tailings reprocessing from TSF-1 commenced in 2021 at the northeastern limits of the impoundment and has been progressing toward the southwest at an approximately 4,500 metric tons of tailings per day. The Tailings Reprocessing Project (TRP) generally includes the systematic removal of tailings from the TSF-1 impoundment and cyclone sand tailings embankment to facilitate extraction

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.

- of sulfide/sulfer before ultimately depositing the reprocessed tailings into the Mineral Hill Pit (TSF-3).
- **Expansion methods:** Staged, downstream construction methods for the East and West wing dike embankments and centerline for the Main Dam embankment.
 - **Embankment Type:** Utilizes homogeneous earth fill enclosing the East and West wing dike embankments. A central portion of the Main Dam embankment on the southeast was cyclone sand filled between a compacted earth fill starter dam and starter dike. The east and west flanks of the main embankment utilize homogeneous earth fill.
 - **Basin:** The impoundment is unlined. To contain seepage, the original design includes a bentonite slurry cutoff trench downstream of the toe of the Main Dam that is socketed into underlying Bozeman Group bedrock. In addition to the slurry cutoff trench, a system of finger drains extending beneath the cycloned tailings portion of the Main Dam was incorporated in the facility design to control seepage from the impoundment and suppress the phreatic surface across the Main Dam. The finger drain system was designed to report to a trench drain at the downstream toe of the Starter Dike which would convey seepage to a clay-lined reclaim basin situated between the Starter Dike and the slurry cutoff trench. At an unknown time following initial facility construction, the clay-lined reclaim basin was converted to a geomembrane-lined basin.
 - **Deposition Start and End (year):** 1983-1993
 - **Tailings Storage Capacity:** Approximately 14 Mm³ tailings at closure; 1.0 Mm³ of tailings removed since 2021 as part of the tailings reprocessing project.
 - **Current Permitted impoundment:** Dam and impoundment are closed and closure cover is constructed. Current permit allows excavation of tailings as part of the tailings reprocessing project.
 - **Current Maximum Embankment Height:** 58 meters at Main Dam.
 - **Supernatant Pool Configuration:** None.
 - **Facility Drainage:** A system of finger drains extending beneath the cycloned tailings portion of the Main Dam was incorporated in the facility design to control seepage from the impoundment and suppress the phreatic surface across the Main Dam. The finger drain system was designed to report to a trench drain at the downstream toe of the Starter Dike which would convey seepage to a clay-lined reclaim basin situated between the Starter Dike and the slurry cutoff trench. At an unknown time following initial facility construction, the clay-lined reclaim basin was converted to a geomembrane-lined basin. Throughout operations, efforts to delineate and capture uncontrolled seepage of tailings solution beneath the facility embankments were performed. As a result, several series of pumpback wells were installed downstream of the Main Dam and along the eastern and western boundaries of the facility. During operations, the pumpback systems captured seepage from the impoundment to be recirculated back to the facility supernatant pond. The pumpback systems presently remain in operation; however, captured seepage, which has dramatically reduced since the end of operations, is now pumped to the neighbouring TSF-2 West Seepage Basin. Currently, fourteen (14) pumpback wells are active downstream of the Main Dam and five (5) pumpback wells are active along the Common Embankment (East Wing Dike).

2. The Consequence Classification (Requirement 4.1)**Facility Consequence Classification**

Current Classification	Classification used for Design
Significant March 2025	Significant March 2025

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

The TSF Risk Assessment was updated in January 2025 and no risk drivers were identified. The assessment confirmed that the measures implemented for the facility ensure the risk level is As Low As Reasonably Practicable (ALARP).

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 Analysis (DBA) study was performed in 2025 for the credible failure modes. The hypothetical failure modes are used for the DBA to update the emergency preparedness and response plan. The results of the DBA indicate negligible crest deformation and movement of the downstream toe of the main embankment and impacts of a potential breach are relatively minor. A summary of potential material impacts is described below.

Summary of Potentially Material Impacts

Aspect	Impact Description	Mitigation Measure(s)
Community and Infrastructure	Anticipated runout of a potential tailings release is expected to be less than approximately 365 meters (1,200 feet). No impacts to downstream community infrastructure are expected.	N/A
Environmental	Tailings runout could impact existing seepage basing and pumpback well systems located at immediate downstream toe of the main embankment. Disruption of these systems could result in temporary loss of tailings solution seepage containment.	Heavy equipment to remove tailings from downstream toe and re-install pumpback wells to capture seepage of tailings solution.
Economic	Tailings runout could impact existing seepage basin and	Heavy equipment will be required to remove tailings

Aspect	Impact Description	Mitigation Measure(s)
	private internal access roads for the mine. No damage to neighbouring property expected.	from downstream toe and re-establish internal mine access roadways.

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)

Foundation conditions for the facility were generally competent Quaternary alluvial deposits and in some select areas the underlying Tertiary sedimentary rock formation (referred to as the Bozeman Group) was exposed during construction. The Precambrian sedimentary rock formation (referred to as the LaHood Formation) is reported to be exposed near the northwestern corner of the TSF-1 footprint and dives down to the southeast to depths of several hundred feet in the vicinity of the main embankment.

The Main Dam of the facility is situated at the downgradient end of a natural drainage (Sunlight Gulch) and was designed and constructed as a centerline raised embankment. A central portion of the Main Dam (approximately 290 meters [950 feet] in length) is composed of cyclone tailings sand deposited between a compacted, earthen starter dam (approximately 24 meters [80 feet]) and starter dike (approximately 11 meters [35 feet]). As the cycloned tailings portion of the Main Dam grew upward from the starter dam, the east and west flanks of the Main Dam, beyond the lateral extents of the starter dam, were periodically raised in a center-line configuration using compacted earth fill. Likewise, the East and West Wing Dikes, also constructed from compacted earthfill, were periodically raised in a downstream configuration to contain the advancing tailings deposit and follow natural ridge lines to the north and northwest. Several small diversion embankments and a diversion channel were designed and constructed along the northern limits of the TSF-1 impoundment to divert surface water runoff from upstream watersheds.

The facility was designed to be unlined and utilize the natural drainage topography and subsurface conditions of the Sunlight Gulch. Seepage from the impoundment is either detained by a slurry cutoff trench socketed into bedrock at the downstream toe of the Main Dam embankment or intercepted by series of pumpback wells. The flow rate from pumpback wells is routinely monitored and show a significant reduction in captured seepage following the conclusion of tailings deposition into the facility.

Record of construction documentation of the initial start dam and starter dike constructed in 1982 is available. It is assumed that the original design drawings for the facility were generally followed, and construction was performed throughout operations, as needed. The maximum height of the Main Dam embankment is approximately 58 meters (190 feet).

TSF-1 has been in varying states of closure over the past 30 years, but recently, operations have been reinstated as part of the tailings reprocessing project (TRP) which commenced in 2021. The TRP generally includes the systematic removal of tailings from the TSF-1 impoundment and cyclone sand tailings embankment to facilitate extraction of sulfide/sulfer before ultimately depositing the reprocessed tailings into the Mineral Hill Pit.

No additional raises to the facility are expected. At the completion of the on-going TRP, the TSF-1 facility will effectively be removed and the natural topography of the Sunlight Gulch drainage restored.

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);

Source	Material Finding	Mitigation Measures
2025 DSI	No material findings	None
2024 DSI	No material findings	None

7. A summary of material³ 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.

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:

- **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);**

An Emergency Action Plan (EAP) has been developed for the GSM TSFs and is heavily focused around TSF-2 as the breach inundation impacts interstate highway and sensitive areas outside of the site boundaries and in the public domain. TSF-1 and 3 inundation terminates within the facility boundaries and inundation is localized where infrequent travel or work is required. These action and response plans are available as set forth within the Montana Tailing management program and the Barrick Tailing Management Standard. The EAP describes procedures for reporting and responding to a wide range of potential adverse events at the GSM TSFs and includes a notification flowchart to ensure stakeholders and responders are informed promptly

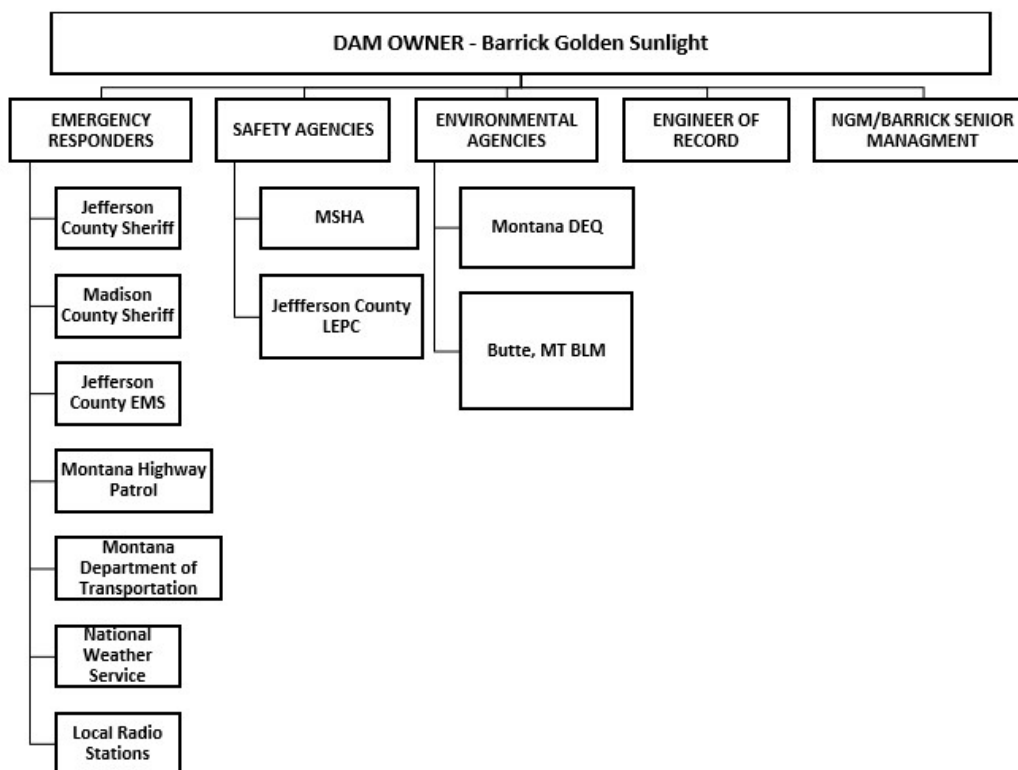
² Material findings are findings that have a high probability of becoming or actual dam safety issues that require immediate attention and are considered immediately dangerous to life, health or the environment, a significant regulatory enforcement.

³ 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).

and engaged in event response. The ERP also includes maps of the external extents of potential downstream inundation areas to allow notification and potential evacuation in the event of a potential dam breach and tailings release. The Emergency Plans are reviewed annually and updated as necessary to reflect changes in site conditions by GSM's responsible personnel, available resources, and contractors who may be engaged in an emergency response.

EMERGENCY NOTIFICATION FLOWCHART



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

Dates of Independent Reviews

Review Type	Latest Review	Previous Review
IGRB ⁴	2022	2009
DSR ⁵	July, 2025 (in progress)	None

⁴ IGRB: Independent Geotechnical Review Board

⁵ DSR: Dam Safety Review

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)

List of Documents Shared with Local Authorities and Emergency Services

Local Authority or Emergency Services	Document
Bureau of Land Management	EPRP (EAP) – Provided annually
Montana Department of Environmental Quality	EPRP (EAP) – Provided annually
Montana Department of Emergency Management	EPRP (EAP) – Provided annually
Montana Highway Patrol	EPRP (EAP) – Provided annually
National Weather Service	EPRP (EAP) – Provided annually
Jefferson County Sheriff	EPRP (EAP) – Provided annually
Madison County Sheriff	EPRP (EAP) – Provided annually

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 Golden Sunlight Tailings Storage Facility 1 ("TSF-1"), which is currently operationally closed; the design, storage capacity and lifecycle of TSF-1; the potential environmental and social impacts of TSF-1 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 TSF-1.

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; 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 Montana, United States, or other states 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 TSF-1; 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.