

# GISTM Principle 15 – August 2025 Public Disclosure

Golden Sunlight Mines Golden Sunlight TSF-2



#### FACILITY LEVEL STATEMENT OF CONFORMANCE<sup>1</sup>

The Golden Sunlight Tailings Storage Facility 2 is in Full Conformance with the GISTM.

#### 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 Tailings Storage Facility 2 (TSF-2). TSF-2 is an existing facility, located at the Golden Sunlight Operation, approximately 7 miles east of Whitehall, Montana.

The Golden Sunlight Mine TSF-2 is described by the following details:

- Facility Operational Status: Closed facility actively used for site-wide water management; tailings have not been deposited since June 2019.
- **Expansion Methods**: Staged, downstream construction methods for the East and West wing wall embankments and centerline for the Main Embankment
- Embankment Type: Utilizes homogeneous earth fill enclosing the north, west, and east sides of the facility. The main embankment on the south was cyclone sand filled for the first 14 years (1993 to 2007) of operation and subsequently modified to earth fill (2007-2015).
- Basin: The impoundment is continuously lined with 60-mil high-density polyethylene (HDPE) geomembrane liner.
- **Deposition Start and End (year)**: 1993-2019

<sup>&</sup>lt;sup>1</sup> 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.



#### GISTM Principle 15 – August 2025 Public Disclosure – Golden Sunlight Mines – Golden Sunlight TSF-2

Page 3 of 11

- **Tailings Storage Capacity**: 29.6 M m<sup>3</sup> total storage. 27.7 Mm<sup>3</sup> of tailings are currently stored in TSF-2.
- **Current Permitted impoundment**: Dam is permitted and constructed to the 4,779 foot elevation.
- Current Maximum Embankment Height: the maximum embankment elevation is approximately 4,779 feet at the Main embankment (Dam height is 71.6 m). This elevation is also the current permitted height. No increase in height is anticipated.
- Supernatant Pool Configuration: The supernatant pool is located in the northeast corner of the facility against the East Wing Dike and North Dike. The pool maintains at least 300 foot distance from the Main Embankment during the PMP storm event. Solution is transferred from the supernatant pool to the plant area with two shore mounted pumps on a constructed causeway from the North Dike that connect to two intake lines on a floating barge.
- Facility Drainage: The TSF includes an underdrain system, consisting of two basin underdrains and a series of finger drains, placed above the geomembrane liner to control seepage and promote tailings consolidation. The collected solution is conveyed through the Main Embankment in collection pipes and finger drains. The collected solution is transferred to East and West Seepage Collection basins then pumped to the Seepage pumphouse where it is pumped back to the TSF-2 supernatant pond.

#### 2. The Consequence Classification (Requirement 4.1)

#### Facility Consequence Classification

<b>Current Classification</b>	Classification used for Design
Very High	Extreme
April 2024	

### 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 June 2023 and 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). The risk assessment results were reviewed during the EoR dam safety inspection on April 15, 2025 and no additional corrective actions or risks were identified from previous inspections.

## 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 by the EoR in accordance with Global Industry Standard on Tailings Management (GISTM) and Canadian Dam Association (CDA) guidelines for tailings DBA. The risk driving PFMs are accommodated with the existing DBA and no update was deemed necessary. A summary of potential material impacts is described below.



#### Summary of Potentially Material Impacts

Aspect	Impact Description	Mitigation Measure(s)
Community and Infrastructure	The impoundment is 7 miles from the Town of Whitehall (pop. 1,200) and 2 miles from Cardwell (pop. 15). Tailings and water release will impact 22 residences within the Jefferson River floodplain, including Cardwell.	Continue drain down of tailings. Robust, active monitoring systems for Main Dam and supernatant pool Established emergency response plan with evacuation areas and responses.
	An elementary school is within the inundation footprint. (65 students) 0.5 miles directly south of Cardwell, MT. Impact will be low.	Access south to outside the inundation footprint will be available to evacuate and the students can be bussed to the Whitehall elementary school until any repairs/clean-up etc. is completed.
	A major interstate and local highway will be impacted directly down gradient of the embankment.	A detour for traffic is available south of the inundation footprint.
Environmental	Sedimentation impacts would impact water quality and prevent guided fishing for a period of up to a year while clean-up activities occur.	Heavy equipment in river to remove sediment along several miles of impacted slough and riverbeds.
Economic	Tailing would impact agricultural land and cattle with up to 1-2 feet of tailing covering grazing land and agricultural crops (alfalfa, hay,etc.) within the inundation footprint.	Heavy equipment will be required to scrape tailing from crop lands and any livestock lost will be replaced.
	Tailing will enter the Jefferson Slough and River with sedimentation into a fishery that will impact local tourism and guided fishing businesses.	Loss of revenue for Guides and outfitters on that stretch for up to a year. Alternative locations exist for guides.
	Road impacts would slow traffic and could result in a loss of revenue and affect supply chains.	Established emergency response plan with detour routes.



#### 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 impoundment is fully lined with a HDPE geomembrane that directs solution to two underdrain seepage ponds (basins) directly downgradient of the Main Dam.

The ring-dike facility was designed and constructed as a centerline-raised Main Dam (southern) embankment that is composed of cyclone tailings sand deposited between a compacted, earthen starter dam and toe dike (to a crest elevation of 4,730 feet). Expansions after this elevation continued to be centerline, but were composed of compacted, earthen fill. A toe buttress was added to the Main Dam to support global stability.

The eastern, northern, and western embankments, providing full encompassing of the ring-dike facility, were designed and constructed as downstream raised compacted, homogenous earth fill.

Each stage of the facility has been designed by the EoR. No additional raises to the facility are expected.

The construction history of the facility is summarized below.

During operations, there was an update in the seismic design criteria identified in a DSR of 2012. This update in design criteria resulted in a buttress in the main embankment during 2014.

Construction Stage	Completion Date	Southwest Crest Elevation (feet amsl)	Design Aspects
Stage 1	1992	4640	Initial TSF-2 construction – main drains, impoundment finger drains and cross drains, lined downstream solution collection ponds, Main Starter Dam and Toe Dike, and storm water diversion channel.
Stage 2	1995	4657	First expansion of TSF-2 – raise of Main Starter Dam and East and West Wing Dikes, extension of the impoundment liner to elevation 4,650 ft, and extension of the impoundment drainage system.
Stage 3	1997	4681	Second expansion of TSF-2 – extension of the East and West Wing Dikes and dike lining system, extension of the impoundment lining system to a minimum elevation of 4,676 ft, and extension of the impoundment drainage system.



Construction Stage	Completion Date	Southwest Crest Elevation (feet amsl)	Design Aspects
Stage 4	1999	4695	Third expansion of TSF-2 – extension of the East and West Wing Dikes and dike lining system; extension of the impoundment lining system to a minimum elevation of 4,690 ft, and extension of the impoundment drainage system.
Stage 5	2002	4709	Fourth expansion of TSF-2 — minor raise (~8-15 ft) of the West Wing Dike and the dike lining system, extension of the impoundment lining system within the west corner of the impoundment to elevation 4,701 ft, and extension of the impoundment drainage system.
Stage 6	2004	4730	Fifth expansion of TSF-2 – raises to the East and West Wing Dikes and the dike lining system, an extension of the impoundment lining system, and the extension of the impoundment drainage system. The east basin was also relined to include a geonet leak collection system, a monitoring port and a new primary HDPE liner.
Stage 7	2007	4735	Sixth expansion of TSF-2 – raise to the East Wing Dike and the dike lining system, and the impoundment area and liner were extended to a minimum elevation of 4,722 ft.
Stage 8	2010	4746	Seventh expansion of TSF-2 – raise to the East and West Wing Dikes, raise to the North Dike, West Bench and along the Main Dike. Increase operating pool.
Stage 9	2012	4763	Eighth expansion of TSF-2 – raise to the East and West Wing Dikes, raise to the Dam.
Stage 10	2014	4771	Ninth expansion of TSF-2 - installation of the Toe Buttress
Stage 11	2015	4779	Tenth expansion of TSF-2 – deferred the second half of construction as a result of ore quantity and grade.

Page 7 of 11

6. A summary of material<sup>2</sup> 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	n/a
2023 DSR	No material findings	n/a

7. A summary of material<sup>3</sup> findings of the environmental and social monitoring programme including implementation of mitigation measures (Requirement 7.5)

No material Environmental and Social incidents have been reported for this facility for the period to date.

- 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 specifically for the GSM TSF-2 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 TSF-2 and includes a notification flowchart to ensure stakeholders and responders are informed promptly and engaged in event response. The EAP also includes maps of potential downstream inundation areas to allow notification and potential evacuation in the event of a potential dam breach and tailings release from the TSF. The EAP is a subset of an overall, site-wide Emergency Preparedness and Response Plan (EPRP) developed and maintained for the Golden Sunlight Operation. The EAP and EPRP are both 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.

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<sup>&</sup>lt;sup>2</sup> 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.

<sup>&</sup>lt;sup>3</sup> An incident is considered material if it:

a) Causes significant negative impact on human health or the environment;

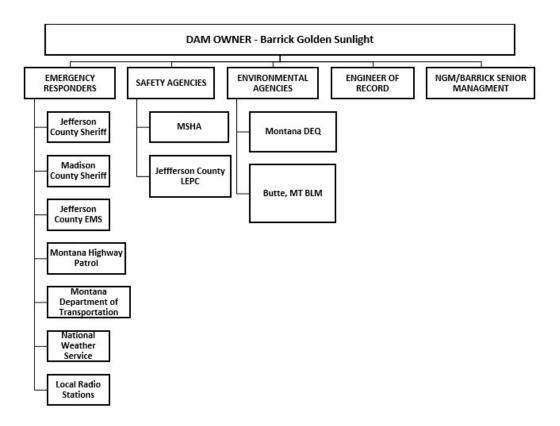
b) Extends onto publicly accessible land and has the potential to cause significant adverse impact to surrounding communities, livestock or wildlife;

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).



#### **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
IGRB⁴	June 2022	June 2013
DSR <sup>5</sup>	June 2023	None

<sup>&</sup>lt;sup>4</sup> IGRB: Independent Geotechnical Review Board

<sup>&</sup>lt;sup>5</sup> DSR: Dam Safety Review



#### GISTM Principle 15 – August 2025 Public Disclosure – Golden Sunlight Mines – Golden Sunlight TSF-2

Page **9** of **11** 

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

Page **10** of **11** 

#### **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

GISTM Principle 15 – August 2025 Public Disclosure – Golden Sunlight Mines – Golden Sunlight TSF-2

Page 11 of 11

#### 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 2 ("TSF-2"); the design, storage capacity and lifecycle of TSF-2; the potential environmental and social impacts of TSF-2 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-2.

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 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-2; 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, caveins 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.