



GISTM Principle 15 – August 2025 Public Disclosure

Grants Reclamation Project Small Tailings Pile

5 August 2025

FACILITY LEVEL STATEMENT OF CONFORMANCE¹

The Grants Small Tailings Pile (STP) is in Partial Conformance with the GISTM. The site is closed with a low risk to people and the environment. Work is planned and ongoing to achieve Full Conformance by 2028, including a dam safety review, studies to update the knowledge base, risk assessment, downstream impact assessment, engineering evaluations, design 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)

The Grants Reclamation Project Small Tailings Pile (STP) is a closed facility owned by Homestake Mining Company, a subsidiary of Barrick Mining Corporation. The STP used downstream construction, started deposition in 1958, ceased deposition in 1962 is approximately 7.6m in height, and contains approximately 1.1M tonnes of tailings.

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.

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)

Reference	Risk driver PFM ²	Existing controls	Additional Controls to Meet ALARP
2020 FMEA ³	Earthquake (1:10,000) causes liquefaction of embankment	None	An investigation incorporating geophysical (SRT/ERT MASW) and geotechnical (CPTu) field work was initiated in March 2025. Results of the investigation will be used to evaluate whether additional controls are required.
	Earthquake (1:10,000) causes foundation/sliding failure caused by weak zone in foundation		
	Earthquake (1:10,000) causes liquefaction of impounded tailings		

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)

Credible flow failure scenarios have not been identified. A confirmatory geotechnical and geophysical investigation has been initiated to address data gaps. Once the investigation is complete, the identification of credible flow failure modes, breach analysis and impact assessments vulnerability will be evaluated.

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)

The STP is situated in a relatively flat valley and is a paddock type impoundment. There are four geologic units present beneath the STP; quaternary alluvium (14-30 meters thick), the Chinlie Formation (shale, sandstone, mudstone 274 meters thick), and the San Andres

² Risk Driver Potential Failure Mode (PFM) are derived from ongoing TSF Risk Assessment work. The listed PFMs are the ones that contribute the most to the total risk.

³ FMEA: Failure Mode and Effects Analysis

Limestone and Glorieta Sandstone (60-60 meters thick combined). Floods are managed by stormwater diversion controls which are regularly inspected and maintained.

The STP contains an estimated 1.1 million tonnes of tailings and approximately 300,000 tonnes of contaminated soils. Tailings deposited within this impoundment were contained entirely within a perimeter embankment composed of compacted native alluvial sandy clay. The embankment was compacted and raised to a height of 6-8 meters. The embankment crest was constructed with a minimum 3 meter width and a width of approximately 12 meters at the base. The STP covers approximately 16 hectares.

The STP contains a decommissioned Evaporation Pond (EP-1) on the northern two-thirds of the pile and a contaminated soil and debris disposal area on the southern portion of the pile. The STP was partially reclaimed between 1993 and 1995 per the approved closure plan. An average 30 cm thickness of clean borrow material was placed as an interim cover on the southern portion of the STP, outside of the decommissioned EP-1. The STP does not have a spillway, but it has significantly more capacity than would result from the maximum probable precipitation (PMP) event.

In 2024, an average 40 cm thickness of clean borrow material was placed as an interim cover on the pond sediments in the EP-1 area of the STP. It is the permitted final repository for all process components for the site and, as such, the STP will remain in a state of interim reclamation until groundwater remediation activities cease at the site, when all site infrastructure will be disposed before final reclamation of the STP.

The approved final cover design for the STP is consistent with the currently approved LTP designs.

The STP has been engineered, and the design, construction, and interim closure of the facility were overseen by a qualified engineer and the appointed Engineer of Record and approved by the US Nuclear Regulatory Commission. The table below summarizes the stages of construction.

Stages of STP Construction

Stage	Date	Total Height (m)
STP (single lift)	1958	8

6. A summary of material⁴ 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
2024 DSI	No material findings	None

⁴ 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.

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.

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 tailing's 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).

The site's generalized Emergency Response Plan (ERP) provides a predetermined plan of action to be implemented in the event of an emergency. It defines the roles and responsibilities of all entities involved, prioritizing protecting individual health, safety, and the environment. Once the 2025 confirmatory investigation is completed, the need for a TSF-specific EPRP will be addressed.

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)	September 2023	None
Dam Safety Review (DSR)	Initiated in June 2025	None

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).

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).

The site's generalized Emergency Response Plan (ERP) provides a predetermined plan of action to be implemented in the event of an emergency. Once the 2025 confirmatory investigation is completed, the need for a TSF-specific EPRP, including communication of documentation and practices, will be addressed accordingly.

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 Grants Reclamation Project Small Tailings Pile ("GRP STP"); the design, storage capacity and lifecycle of GRP STP; the potential environmental and social impacts of GRP STP 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 GRP STP.

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 South Dakota, the 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 GRP STP; 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.