# GISTM Principle 15 – August 2025 Public Disclosure

Phoenix

Phoenix TSF

5 August 2025

## FACILITY LEVEL STATEMENT OF CONFORMANCE[1]

The Phoenix Tailings Storage Facility (TSF) 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)**

Nevada Gold Mines LLC (NGM), a joint venture between Barrick Mining Corporation (Barrick) and Newmont Corporation (Newmont), owns and operates the Phoenix Tailings Storage Facility (TSF) located at the Phoenix site approximately 20 kilometers southwest of Battle Mountain, Nevada.

The Phoenix TSF is described by the following details:

- **Facility Operational Status**: Operating.
- **Expansion Methods**: Staged construction, downstream and centerline dam raise methods.
- **Embankment Type**: Full ring facility contained by rock fill embankments consisting of run-of-mine waste rock fill with a geomembrane liner on the upstream face of the starter dam.
- **Basin**: Geomembrane liner with a drainage system (above the liner) to capture and convey seepage to ancillary ponds which are pumped to the mill for reuse.
- **Deposition Start and Expected End (year)**: 2006 - 2031

[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 engineering design is complete, approved by Accountable Executive, permitted, budgeted, and a construction schedule has been developed and approved 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.

- **Tailings Storage Capacity**: Conventional slurry tailings; 280 M tonnes planned ultimate storage; 175 M tonnes currently stored.
- **Current Permitted Impoundment**: Dam is constructed and permitted through RE 5001 (crest elevation 1,524 m).
- **Current Maximum Embankment Height**: 72 m.
- **Planned Ultimate Maximum Embankment height**: 82 m.
- **Supernatant Pool Configuration**: Center pool with water pumped to mill for reuse.
- **Long-term Closure Plan**: Embankments will be sloped, covered, and seeded to their final closure configuration. After tailings deposition has ceased and sufficient drain down has occurred, the facility will be capped, covered, and seeded to form a stable landform. Once the cover is complete a spillway will be developed to route meteoric water off the facility. Long term draindown will be passively managed in evaporation cells.

## 2. The Consequence Classification (Requirement 4.1)

***Facility Consequence Classification***

| Current Classification | Classification used for Design |
|---|---|
| Very High (GISTM 2020) | Extreme (GISTM 2020) |

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

The Phoenix TSF risk assessment was updated in July 2023 and the risk driver identified is shown on the table below along with additional controls to be implemented for the facility ensure the risk level is as low as reasonably practicable (ALARP).

***Summary of Risk Assessment Findings***

| Reference | Risk driver PFM[2] | Existing Controls | Additional Controls to Meet ALARP |
|---|---|---|---|
| 2023 RA[3] | Seismic instability of south embankment | Downstream shell overall slope is 2.5H:1V. | Construction of a buttress is ongoing to meet post-earthquake stability criteria. |

## 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)

The following is a summary of material environmental, social and critical facilities/infrastructure which may be impacted in the unlikely event of a catastrophic tailings facility failure. For each aspect, the table provides a summary of the nature of the potential impacts and vulnerabilities. The assessment of human exposure and vulnerability was completed utilizing information from previous dam breach and downstream inundation analysis, and Emergency Action Plans (EAP).

[2] Risk Driver Potential Failure Mode (PFM)[2]
[3] RA: Risk Assessment

***Summary of Potentially Material Impacts***

| Aspects | Impact description | Mitigation Measure(s) |
|---|---|---|
| Environmental | A release could impact critical habitat for species of special interest in the potential inundation area. Tailings long-term acid generation potential based on their high sulfide sulfur content, low neutralization potential ratio, and metal concentrations which may impact water quality in the unlikely event of a failure. | Develop and implement recovery and rehabilitation plan |
| Public Infrastructure | Off-site impacts could cause blockage of public Copper Basin road, disruption of grazing allotments, and reduce public access to recreation. Losses to recreational areas and infrequently used transportation routes within the potential inundation area would be temporary. Electrical transmission lines cross the potential inundation area. No significant offsite disruption to community infrastructure and services are anticipated. | In the event of an emergency, announcement will occur via mine radios across all channels covering the affected area, coordinate with local authorities, and proceed to set up road closures and detour routes as outlined in the EAP. |
| Health, Social, & Cultural | Within the potential inundation area, there are no known community welfare or assets or significant recreational sites. Significant disruption of business, service or social dislocation are unlikely. There are multiple cultural resources sites within the potential inundation area. Risks to health from exposure to tailings are assumed to be temporary as long as human exposure mitigation is implemented. | EAP to provide warning. |
| Economic | Dependent upon duration of suspension of operations, negative business and livelihood impacts could occur if there are layoffs. | Develop and implement recovery and rehabilitation plan. |

**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 Phoenix TSF is a full ring facility contained by rock fill dams constructed with run-of-mine waste rockfill and a geomembrane liner within the basin and starter dams. The embankment dams were initially raised with the downstream method up to crest elevation 1,501 m followed by a transition to the centerline method including a vertical chimney drain.

The supernatant pool configuration is a center pool to promote tailings beach development upstream of the embankments. Sufficient flood storage and freeboard is maintained to contain the inflow design flood and mitigate against unintentional releases (i.e., zero-discharge facility with no constructed spillway). Seepage through tailings reports to the underdrain system above the geomembrane liner, comprising of a drainage blanket and a perforated piping system. The underdrain system and seepage reports to ancillary ponds via gravity flow.

The underlying geology of the facility consists generally of dense, coarse-grained alluvial fan materials. The Phoenix TSF foundations comprise either naturally occurring materials (described above) or is underlain by historical tailings impoundments including the Historic Gold TSF.

Each stage of the tailing facility has been engineered, and the design and construction of the facility was overseen by a qualified engineer and the appointed Engineer of Record. The table below summarizes the historical and planned stages of construction.

***Stages of Dam Construction***

| **Construction Stage** | **Completion Date** | **Crest Elevation (m)** | **Significant Design Changes** |
|---|---|---|---|
| 1 Starter Configuration | 2005 | 1477 | |
| 2 | 2007 | 1483 | |
| 3 | 2009 | 1489 | |
| 4 | 2011 | 1495 | |
| 5 | 2013 | 1501 | |
| 6 | 2017 | 1507 | Transitioned to centerline dam raise method. Established center pool configuration. |
| RE 4953 | 2017 | 1510 | Start annual dam raise sequencing. |
| RE 4961 | 2018 | 1512 | |
| RE 4965 | 2019 | 1513 | |
| RE 4973 | 2020 | 1516 | |
| RE 4981 | 2021 | 1518 | |
| RE 4993 | 2022 | 1522 | |
| RE 5001 | 2023 | 1524 | |
| RE 5009 | 2025 | 1526 | South buttress construction ongoing to meet post-earthquake stability criteria. |
| RE 5025 | 2028 (Planned) | 1532 | |
| RE 5035 | 2029 (Planned) | 1535 | |

**6. A summary of material[4] 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);**

**Summary of *Material Findings* and Mitigation Measures**

| Reference | Material Findings Summary | Mitigation Measures to Meet ALARP |
|---|---|---|
| 2022 DSR[5] | No material findings | Not applicable. |
| 2024 DSI[6] | No material findings | Not applicable. |

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

There have been no material incidents or findings from the environmental and social incidents monitoring programme since the August 2023 Public Disclosure was issued for the Phoenix TSF.

**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:**

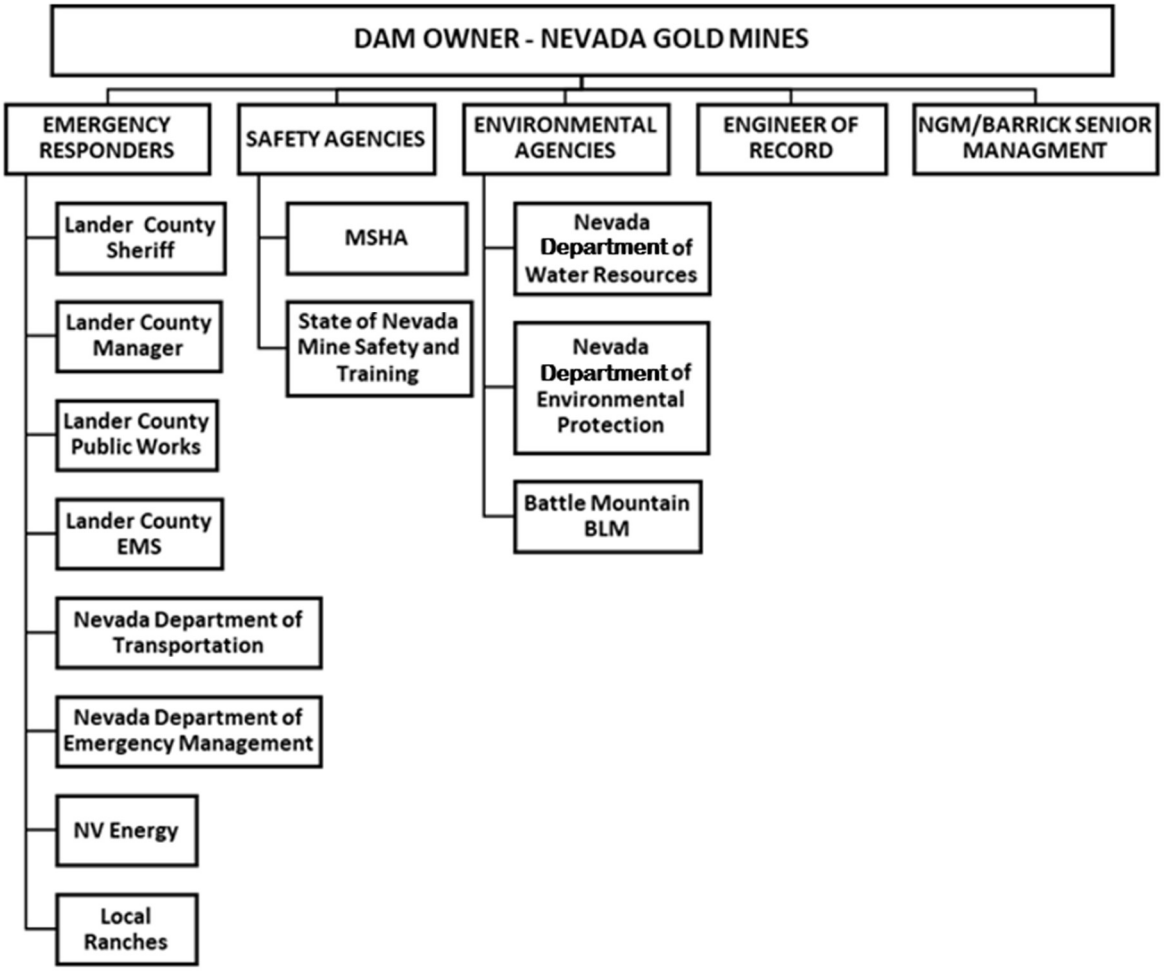
- **informed by credible flow failure scenarios from the tailings facility breach analysis;**
- **includes emergency response measures that apply to project affected people as identified through the tailings facility breach analysis and involve cooperation with public sector agencies; and**
- **excludes 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 Phoenix TSF to meet regulatory requirements. The EAP describes procedures for reporting and responding to a wide range of potential adverse events and includes a notification flowchart (see below) to ensure stakeholders and responders are informed promptly and engaged in event response.

The EAP is a subset of an overall, site-wide Emergency Preparedness and Response Plan (EPRP) developed and maintained for the Phoenix Mine Operation. The EAP and EPRP are both reviewed annually and updated as necessary to reflect changes in site conditions by NGM's responsible personnel, available resources, and contractors who may be engaged in an emergency response.

[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.
[5] DSR: Dam Safety Review.
[6] DSI: Dam Safety Inspection.
[7] 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




Dam Owner:

1. Verify and assess emergency conditions.
2. Notify other participating emergency management agencies.
3. Take corrective action at facility.
4. Update EAP on at least an annual basis.
5. Respond to emergencies at facilities.
6. Provide condition status reports to participating emergency management agencies.
7. Take action to prevent/minimize loss of like and damage to environment due to an emergency.

Battle Mountain Volunteer Fire Department:

1. Receive condition status reports from Dam Owner.
2. Notify Public within Battle Mountain, if required in the case of fire.
3. Conduct evacuation from endangered areas, if required.
4. Render assistance to Lander County, as necessary.
5. Render assistance to Dam Owner, as necessary.

Sheriff and Emergency Services:

1. Receive condition status reports from Dam Owner.
2. Notify public within Lander County, if required.

3. Conduct evacuation from inundation areas in Lander County, if required.
4. Provide mutual aid to Dam Owner, if requested at site.

NGM Security/Dispatch Contact on Mine Radio/Safety Manager:

1. Initiate evacuation plan and emergency response plan.
2. Evacuate and secure inundation area.
3. Issue announcements over mine radios on all channels for all personnel.
4. Coordinate with Emergency Services to perform rescue operations to minimum loss of life.
5. Perform environmental containment actions to minimum environmental damage

External Relations – Head of Corporate Social Responsibility:

1. Contact Environmental Manger
2. Make external notifications following Notification Flow Chart
3. Continue communications as needed until incident is resolved.

Process Manager :

1. Respond to site.
2. Determine Evacuation Plan and Secure Dan Plan and implement through Dispatch and EM
3. Contact HCSR to start Notification Flow Chart.
4. Make assessments to coordinate mitigative repair actions.
5. Keep HCSR updated with latest developments.
6. Terminate an incident.
7. Being post event briefing.

Mine Manager:

1. Respond to site.
2. Make assessments and coordinate mitigative repair actions.

Environmental Manager:

1. Make external notifications following Notification Flow Chart

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

***Dates of Independent Reviews***

| Review Type | Latest Review | Previous Review |
|---|---|---|
| **DSR** | October 2022 | None |
| **IGRB**[8] | October 2024 | September 2022 |

[8] IGRB: Independent Geotechnical Review Board.

**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 – Updated annually as needed |
| Nevada Division of Water Resources | EPRP, EAP – Updated annually as needed |
| Nevada Division of Environmental Protection | EPRP, EAP – Updated annually as needed |
| Lander County Sheriff | EPRP, EAP – Updated annually as needed |
| Lander County EMS | EPRP, EAP – Updated annually as needed |

**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 Phoenix Tailings Storage Facility ("Phoenix TSF"); 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 Phoenix TSF.

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 Nevada, United States, or other 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 Phoenix TSF; 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.