CORRECTIVE ACTION PLAN REQUIREMENTS

FOR THE INTERNATIONAL CYANIDE MANAGEMENT CODE

JUNE 2021
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The International Cyanide Management Code (hereinafter “the Code”, “Code” or “the Cyanide Code”), this document, and other documents or information sources referenced at www.cyanidecode.org are believed to be reliable and were prepared in good faith from information reasonably available to the drafters. However, no guarantee is made as to the accuracy or completeness of any of these other documents or information sources. No guarantee is made in connection with the application of the Code, the additional documents available or the referenced materials to prevent hazards, accidents, incidents, or injury to employees and/or members of the public at any specific site where gold or silver is extracted from ore by the cyanidation process. Compliance with this Code is not intended to and does not replace, contravene or otherwise alter the requirements of any specific national, state or local governmental statutes, laws, regulations, ordinances, or other requirements regarding the matters included herein. Compliance with this Code is entirely voluntary and is neither intended nor does it create, establish, or recognize any legally enforceable obligations or rights on the part of its signatories, supporters or any other parties.
CORRECTIVE ACTION PLAN REQUIREMENTS

Corrective Action Plan

Instructions

1) The development and implementation of a Corrective Action Plan is required as an integral part of any audit for Cyanide Code certification of a mining operation, cyanide production operation or cyanide transportation operation where the auditor, based on the audit findings, determines that the operation is in substantial compliance and is certified conditionally, or is in non-compliance and cannot be certified.

2) The full implementation of the Corrective Action Plan and adequate notification to the International Cyanide Management Institute (“ICMI” or “the Institute”) must be completed within one year of the posting on the Cyanide Code website of the Summary Audit Report of an operation found in Substantial Compliance.

3) There is no time limit for implementation of a Corrective Action Plan developed to correct a finding of non-compliance.

4) There is not a specific format requirement for the Corrective Action Plan.

5) A Corrective Action Plan must be submitted to ICMI with any Summary Audit Report having a finding of substantial compliance or non-compliance for one or more Standards of Practice.

Required Contents of the Corrective Action Plan

1) The identification of the Mining, Production, or Transport Standard of Practice under which a deficiency was noted.

2) A brief description of the deficiency(s).

3) Detail description of the corrective action required for each deficiency.

4) Evidence required by the auditor for verification of the completion of each corrective action.

5) The proposed completion date for each corrective action.

Corrective Action Plan Completion Report

The auditor must verify full implementation of the Corrective Action Plan and report the results to ICMI no later than 30 days after completion of all corrective actions. This Corrective Action Plan Completion Report must provide a summary of the evidence that resulted in the conclusion of full compliance for each deficiency that was noted in the Summary Audit Report and was included in the Corrective Action Plan. This Corrective Action Plan Completion Report must be submitted and signed by the lead auditor.

* Due to the sensitivity of security issues regarding storage of cyanide, any Corrective Action Plan items related to security should only identify the need for improved security but should not provide detailed descriptions of the deficiency or corrective action measure.