# Tropicana Gold Mining Company

# International Cyanide Management Code Summary Audit Report

**GBS** Consulting

15 November 2023

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# **Audit Details**

Operation: Tropicana Gold Mine (TGM) Joint Venture

Name of Mine Owner: AngloGold Ashanti Australia Limited (70% owner and

operator) and Regis Resources Limited (30%)

Company: Tropicana Gold Mining Company Pty Ltd

Responsible Person: Johan Viljoen, Processing Manager

Site Address: Tropicana Gold Mine

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PO Box Z5046, Perth WA 6831

Audit Period Commencement: 2 November 2020

Date(s) of Audit: Remote Interviews from 24 - 26 May 2023 inclusive

Site Visit: 29 May - 1 June 2023 inclusive

# **Description of Operation**

The Tropicana Gold Mining Company Pty Ltd (TGM) is a joint venture between AngloGold Ashanti Australia (AGAA) (70% ownership and Manager) and Regis Resources Limited (30% ownership).

TGM is located approximately 340 kilometers east-north-east of Kalgoorlie and 225 kms southeast of Laverton at the edge of the Gret Victoria Desert region of Western Australia. The closest Aboriginal communities are Coonana (230 kms away), Tjuntjuntjara (250 kms away) and Wongatha Wonganarra (220 kms away). The general climate of the Tropicana region is described as arid.

AngloGold Ashanti nominated Tropicana Gold Mine (TGM) as a signatory for the International Cyanide Management Code (Code) in March 2014 and was initially certified in full compliance with the Code on 25 August 2017.

Mining commenced in mid-2012 and the process plant commissioning phase began in September 2013, with full operation beginning in December 2013. TGM currently consists of several operational open pits and an underground mine. The nameplate processing plant capacity of 5.8mtpa was achieved in 2013. A plant expansion project lifted the plant throughput to 7.6mtpa by upgrading conveyors to enable optimal use of the installed major equipment. A second ball mill operational in December 2018 increases throughput to 9 Mtpa to match orebody capability, and lift recovery by 1-2%. Successful drilling has led to to an extension of the initial 10-year life of mine. Ore is processed through crushers and ball mills prior to entering a carbon in pulp/carbon in leach circuit. The process circuit involves dissolving the gold into solution using a process known as cyanidation and which is then adsorbed onto activated carbon. The carbon is then stripped of the gold through an elution process before electrowinning and smelting into gold dore`.

The Leaching circuit consists of 4 x 4000m³ leaching and 6 x 4000m³ adsorption tanks with a tank residency time of 24 hours at a Mill throughput of up to 1175tph. The Adsorption tanks have carbon transfer pumps which transfer carbon between the tanks (counter current). At the end of the Adsorption circuit the slurry flows over a carbon fines recovery screen prior to entering the tailings thickener. Additional water is added to the Tailings Tank to dilute the residual cyanide in the slurry prior to being sent to Tailings storage facility

TGM use only liquid cyanide for processing which is delivered as a 30% w/w sodium cyanide solution. The sodium cyanide solution is produced at Australian Gold Reagent's (AGR's) Kwinana facility located south of Perth, Western Australia. It is then transported via AGR's International Cyanide Management Institute (ICMI) certified Australian Supply Chain in isotainers by rail from Kwinana to Kalgoorlie from where it is then transported by road to the operation. No solid cyanide, other than minor quantities used in the site laboratory, is delivered, or used at the operation. Cyanide solution is stored in a single 440m³ cyanide storage tank. From the cyanide storage tank the cyanide is distributed to the leach tanks (16-

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TK-00A & B and 16-TK-001 & 2) and Carbon in Leach (CIL) tanks (16-TK-003 to 16-TK-008) via a cyanide ring main system. The cyanide is also pumped from the cyanide storage tank directly into the strip solution pipeline as part of the elution reagents.

Tailings waste from the processing circuit is deposited in a single celled paddock tailings storage facility (TSF) with a maximum footprint of 292 hectares. The facility has sufficient storage capacity to accept tailings until the end of the current mine life. Tails return water is recovered from facility via a decant system which pumps the water to the processing plant.

In previous audits TGM has achieved compliance with Standard of Practice (SOP) 4.4 using an alternative compliance measure based on hyper-salinity (> 50,000 mg/L Total Dissolved Solids (TDS)) of tailings and process solutions providing a protective mechanism against wildlife cyanosis. Prior to commencement of operations TGM commissioned a study to determine and implement the processes to achieve certification with this alternative measure to meet the objective of Standard of Practice 4.4 even with tailings discharge of above 50 mg/L Weak Acid Dissociable (WAD) cyanide. The findings of the study that hypersalinity did form a protective mechanism against wildlife cyanosis was accepted by Code auditors and the Code in the initial and subsequent re-certification audits.

This method of achieving compliance with SOP 4.4 is still available to TGM however continuous improvements in cyanide optimisation have resulted in TGMs ability to continuously discharge tailings at less than 50 mg/L WAD cyanide throughout this audit period. This coincided with an improvement in the quality of process water which was consistently less than 50,000 mg/L TDS. TGMs method of compliance with SOP 4.4 was therefore not based on the protective mechanism of hypersalinity during this audit period and it is achieved in the typical manner within the industry of maintaining tailings at less than 50 mg/L WAD cyanide.

New constructed and modified cyanide facilities during this audit period consisted of:

- Leach Feed and Tailings Thickener Duty Swap involving swapping the duties of the 34 m diameter leach feed thickener and the 44 m diameter tailings thickener to increase process plant throughput;
- TSF Wall Lifts: Stages 9, 10, 11, 12 and 13;
- Tailings Booster Station and Tailings Pipeline Upgrade. involved the installation of a booster station and associated infrastructure between the process plant and the TSF.

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# **Auditor's Finding**

This operation is			
☑in	full compliance		
□ in :	substantial com	pliance	
□ no	t in compliance		
with the Internation	nal Cyanide Mai	nagement Code (Code).	
•	•	mpliance issues during the previous	-
Auditor Infor	mation		
Audit Company:	GBS Consulti	ng Pty Ltd	
Primary contact:	Greg Smith		
Email:	gregorsmith@	<u> Pinternode.on.net</u>	
Lead Auditor: Gre	gory Smith		
for Do Co	<u></u>	15 November 23	
Signature of Lead /	Auditor	Date	
Technical Auditor			
M.C. Ollie		15 November 23	
Signature of Techn Auditor	ical	Date	
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I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, as established by the International Cyanide Management Institute (ICMI) and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Auditors.

I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Mining Operations Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

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Signature of Lead Auditor

Name of Mine

# **Principle 1 | PRODUCTION AND PURCHASE**

Encourage responsible cyanide manufacturing by purchasing from manufacturers that operate in a safe and environmentally protective manner.

# **Standard of Practice 1.1**

Name of Mine

_	rtified manufacturers employir ure of their workforce to cyanic		
	☑ in full compliance with		
The operation is	<ul><li>☐ in substantial compliance</li><li>☐ not in compliance with</li></ul>	with Stand	dard of Practice 1.1
Summarize the basis for th	is Finding/Deficiencies Identific	ed:	
manufacturers employing	ICE with Standard of Practice appropriate practices and proto to prevent releases of cyanide	cedures to limit	exposure of their
	Tropicana Gold Mining Compa ertified as being in complianc	-	•
and operating agent CSBP	n cyanide solutions from Austra . All sodium cyanide solutions nide production plant during t	purchased were	e manufactured at
AGR and AngloGold Ashai a Commencement Date of	M under a Sodium Cyanide Sonti Australia Limited. This was in 1 January 2017 for a period of agotiated on 30 June 2020 and	negotiated on 2 f five years. A va	3 December 2016 with ariation to the supply
Management Code (Code Agreement states that AGF	recertified in full compliance of on 28 August 2023. The Sodi Rand its sub-contractors must Cyanide Management Code.	um Cyanide Sol	ution Supply
Tropicana Gold Mine	La Dan.		15 November 2023

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# **Principle 2 | TRANSPORTATION**

Protect communities and the environment during cyanide transport.

## Standard of Practice 2.1

Require that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training and emergency response.

responsibility for safety, s	security, release prevention, training a	nd emergency response.
	☑ in full compliance with	
The operation is	$\square$ in substantial compliance with	Standard of Practice 2.1
	$\square$ not in compliance with	
Summarize the basis for the	nis Finding/Deficiencies Identified:	
managed through the ent	NCE with Standard of Practice 2.1: Re- cire transportation and delivery proces ed transport with clear lines of respons emergency response.	ss from the production facility to
•	ntion Supply Agreement between AGF ortation of Sodium Cyanide and the up oint.	
certified as in compliance transporter under AGRs A	nide solution to TGM via their Australi under the Code on 9 November 2022 ustralian Supply Chain and was the or udit period. Qube Bulk was re-certifie	2. Qube Bulk is listed as a nly transporter used for all
and supply chains respons	f custody records and other documer sible for transporting cyanide from the identify that the transport contractor/e	e producer to the operation.
comply with the then curre	ract between AGR and TGM requires ent ICMI Code for the production and consibility for safety, security, release ng transport of cyanide.	transport of cyanide. This
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# **Principle 3 | HANDLING AND STORAGE**

Protect workers and the environment during cyanide handling and storage.

#### Standard of Practice 3.1

Name of Mine

Design and construct unloading, storage and mixing facilities consistent with sound, accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures

containment measures.	,	
	☑ in full compliance with	
The operation is	$\square$ in substantial compliance with	Standard of Practice 3.1
	$\square$ not in compliance with	
Summarize the basis for the	nis Finding/Deficiencies Identified:	
storage and mixing faciliti	NCE with Standard of Practice 3.1: Des es consistent with sound, accepted en procedures, spill prevention and spill o	gineering practices, quality
the Western Australian Da CSPB) specifications, and cyanide storage tank has gases discharge into a wa	nd storage facilities were designed and angerous Goods Act and Regulations, to Australian Standard AS 4452 for the store a vent at the top of the tank to prevent ter seal pot. TGM cyanide unloading a usuality and have been in place since 2	the cyanide producers' (AGR- torage of toxic substances. The the build-up of HCN gas. Vent and storing facilities have not
	um cyanide for processing, and no sol ng facilities do not therefore exist on sit	•
records of the cyanide un	set of drawings and all construction do loading facilities and storage tank. This was verified on 1 June 2023.	
cyanide unloading, and st	ion was conducted by AGR on 27 Aug orage facilities were constructed as de n Standards AS 4452 identified above.	
sufficient for a single isota	facilities and storage facilities consist on iner to be accessed from an unloading ts of a bunded concrete pad which is c	g tower immediately above it.
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contain, recover, or allow remediation of any spillage from the tanker truck, isotainer system or piping. The unloading pad has a drain into the cyanide storage area bund which can contain the volume of a full isotainer (22,000 litres). A sump pump is located in the sump to pump cyanide solutions to the leaching circuit. All secondary containments for TGM cyanide storage tank are constructed of concrete that provides a competent barrier to leakage.

The cyanide unloading facilities are located within a secure fenced off area, with locked gates, away from offices and workshops. The cyanide storage tank is contained within its own fenced off area adjacent to the cyanide unloading facilities and is located outside in an open-air environment which prevents build-up of hydrogen cyanide gas. It is located away from incompatible materials such as acids at an appropriate distance to prevent mixing and away from offices and workshops. There are no nearby surface waters.

The cyanide storage tank has a level sensor with a digital reading on the unloading facility and transmitter for real time monitoring of the tank volume in the SCADA (Supervisory Control and Data Acquisition) system on the reagents page.

The TGM Cyanide Delivery Work Instruction identifies that the safe fill level for the cyanide storage tank is 95% and that the cyanide storage tank must be under 85% full for a cyanide delivery of two isotainers. Both the driver and the TGM unloading observer must check that the tanks contain the capacity to receive the delivery. Cyanide delivery dockets require the recording of cyanide tank levels before and after delivery.

High and High-High alarms are configured on the SCADA system at 90% and 95% respectively and if the tank level reaches the High-High alarm value, the air supply valve will automatically close to stop unloading and prevent overfilling of the storage tank. The cyanide unloading spotter also has a manual shut off valve to stop unloading if required.

Testing of the high and high-high alarms is simulated on an annual basis (1Y Elec ONL Stat Test LOS Cyanide Area) by maintenance electricians to ensure that the interlocks and alarms associated with a tank overfill are operational. Annual audits of the cyanide unloading and storage facilities by the cyanide supplier (AGR) include inspection of the level sensor for functionality and review of evidence that it is calibrated and maintained. A monthly inspection of the reagents area is conducted by the processing department and includes inspection of the emergency shut off valve and that the cyanide storage tank level indicator is operational.

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Operate unloading, storage and mixing facilities using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

	$oldsymbol{arnothing}$ in full compliance with	
The operation is	$\hfill \square$ in substantial compliance with	Standard of Practice 3.2
	$\square$ not in compliance with	
Summarize the basis for	this Finding/Deficiencies Identified:	

TGM is in FULL COMPLIANCE with Standard of Practice 3.2: Operate unloading, storage and mixing facilities using inspections, preventive maintenance, and contingency plans to prevent or contain releases and control and respond to worker exposures.

TGM receives and uses only liquid sodium cyanide, and no cyanide mixing facilities exist on site.

Cyanide solutions are delivered solely in isotainers which are not handled or stacked on site during the unloading process. The isotainers are removed from site following cyanide unloading. No other cyanide containers are handled by any other means during cyanide unloading.

Red carmosine dye is added to all sodium cyanide solutions by AGR prior to delivery to aid in the detection of uncontained cyanide solutions.

TGM follows a Cyanide Unloading Work Instruction and requires a Reagent Delivery Checklist is completed prior to delivery to prevent exposures and releases during cyanide unloading. The Reagent Delivery Checklist details the personal protective equipment and safety equipment required before commencing unloading. The tanker driver undertakes cyanide unloading in accordance with the AGR Sodium Cyanide Solution Isotainer Unloading at Mine Sites Procedure. They are required to wear appropriate personal protective equipment, face-shield goggles, chemical resistant boots, and gloves in addition to standard mine site PPE requirements of safety boots, long pants and shirts and a hard hat during cyanide unloading.

Completed Reagent Unloading Checklists were verified for the audit period and found to be satisfactorily completed however hardcopy records are missing for period from February 2020 to June 2022. A memo was provided to GBS Consulting by TGM which outlines an investigation into the missing documentation and concludes that 'The period of missing reagent checklists spans from February 2020 to June 2022, and is likely a result of transferring bulk completed checklists to the wrong location.' TGM have provided evidence that the Unloading Procedure

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and associated Unloading Checklist, including pre-unloading and post-unloading inspections, was consistently carried out during the gap period. The basis for this is as follows:

- Reagent Delivery Check sheets were sighted at the Code recertification audit in 2020,
- o The Reagent Delivery Check sheets were sighted during previous Cyanide Code Gap Assessments in 2021 and 2022,
- o The Process Technician/Spotter's name and signature appear within the CSBP chain of custody documentation corresponding with the gap period; and
- Verification via discussion with TGM Supervisors and Superintendents who were on site during the gap period, confirming that the Procedures were followed, and that the checklist was completed by the designated TGM Spotter/Sentry during the gap period.

The auditor accepts TGMs that the checklists were completed but not filed or transferred to the correct location and that the deficiency did not result in a significant or increased risk of cyanide release or worker exposure. It has been verified that hard copy checklists or available for the period July 2022 to May 2023, a period of 10 months. The auditor finds that no further actions are required.

A TGM plant operator is required to act as observer during cyanide unloading operations and is required to wear standard PPE, have an HCN monitor, a handheld radio and have additional PPE of chemical resistant gloves, goggles, face shield and cyanide mask with respirator in date within easy reach.

The observer is not allowed to be on the unloading pad during operations and is required to observe the cyanide unloading from the air-conditioned spotters hut. The observer sits next to the manual shut off valve to stop unloading in an emergency or if any unloading lines burst or start to leak or the storage tanks begin to overflow. An OxySok (oxygen resuscitator) is located in the cyanide spotters hut and full-face masks and canisters are located in the cyanide incident response equipment hut next to the cyanide spotter's hut.

The operation of all hoses, valves, and couplings for unloading liquid cyanide and mixing solid or liquid cyanide is described in the AGR Delivery and Unloading of Sodium Cyanide Procedure. The procedure requires the tanker driver to wash down the hose nozzles, couplings, any spills and drips on the isotainer and trailer; and wash down the unloading area prior to the tanker leaving site.

Both the TGM Cyanide Unloading Work Instruction and AGR Cyanide Unloading Procedure require any cyanide spills to be cleaned up and hosed into the sump in a timely manner if required following unloading. Spills outside of a bunded area are managed in accordance with the Immediate Response Cyanide Incident Procedure and the TGM Cyanide Spill Response Procedure.

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# **Principle 4 | OPERATIONS**

Manage cyanide process solutions and waste streams to protect human health and the environment.

#### Standard of Practice 4.1

Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures.

The operation is	$oldsymbol{arnothing}$ in full compliance with	Standard of Practice 4.1
	$\hfill \square$ in substantial compliance with	
	$\square$ not in compliance with	
Summarize the basis for th	is Finding/Deficiencies Identified:	

TGM is in Full COMPLIANCE with Standard of Practice 4.1: Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures.

TGM have developed written management and operating plans and procedures for cyanide facilities including unloading and storage facilities, leach plants, and tailings impoundments. No cyanide mixing facilities, active heap leach operations, or cyanide regeneration and disposal systems exist at TGM.

TGM has an overarching Cyanide Management Plan which guides cyanide management and use. A Controlled Documents on-line environment is used to control documentation of plans, procedures, manuals, task instructions, area inspections and regulations related to mineral processing and ensure current versions are accessible as listed above. Procedures and Manuals have been developed and implemented for all areas of operation that contain process solutions with 0.5mg/L Weak Acid Dissociable (WAD) cyanide or higher including cyanide unloading and storage; Leaching and adsorption; Elution; Tailings pipelines and pumps; Tailings Storage Facilities; and Process water storages.

TGM uses the following key plans and manuals which identify and describe the standard practices necessary for the safe and environmentally sound operation of the cyanide facilities; Cyanide Management Plan; Contaminated Water Containment Management Plan; Thickening Operations Manual; Carbon in Pulp/Carbon in Leach (CIP/CIL) Circuit Operation Manual; Reagents Area Operation Manual; Tailings Storage Facility Operation Manual. These describe how cyanide facilities are managed and operated and include a description of the processes

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necessary for the safe and environmentally sound operation of the section. TGM Procedures and Work Instructions describe how specific cyanide related tasks are undertaken and include an assessment to demonstrate competency. Procedure and work instruction include cyanide unloading; monitoring of cyanide gas; entry into confined spaces; spill management; flushing cyanide pumps and lines; and equipment decontamination prior to maintenance.

All Manual, Procedures and Work Instructions are reviewed periodically with procedures reviewed every two years and work instructions which are less likely to change are reviewed every five years. Procedures are also reviewed or created in response to changes or additions to process facilities.

TGM continues to maintain plans and procedures that identify the assumptions and parameters on which the facility design was based as necessary to prevent or control cyanide releases and exposures consistent with applicable regulatory requirements. Key assumptions and parameters are contained within the Cyanide Management Plan, Tailings Operations Management Plan, CIL Circuit Operations Manual and Tropicana Gold Project Design Criteria. Key process design criteria were identified in 2011 in the document Tropicana Gold Project Design Criteria (Lycopodium 2011) and include design criteria for ore characteristics, water characteristics, plant design, CIL operation, regent consumption and storage volumes and tailings characteristics.

TGM continues to implement plans and procedures that describe the standard practices necessary for the safe and environmentally sound operation of the facility including the specific measures needed for compliance with the Code, including inspections and preventive maintenance activities.

TGM implements a Change Management Procedure to review proposed changes to production processes, operating practices, or cyanide facilities to determine if they may increase the potential for cyanide releases and worker exposures and incorporate any measures necessary to protect worker health and safety and the environment. The Change Management Procedure outlines the principles and process to manage permanent or temporary changes at TGM. It covers physical changes to plant, equipment, and materials or due to changes in personnel or processes and is designed to ensure that hazard and risk assessments are performed whenever necessary due to planned changes. The change management process includes a step for QA and QC of the proposed change by the Safety Department and or the Environment Department as appropriate and this requires sign off by a relevant department representative. The process is managed electronically through InControl (INX). All change management records are kept in INX. A number of change management examples were reviewed which were signed off by safety and or environmental advisors.

TGM has cyanide management contingency procedures for nonstandard operating situations that may present a potential for cyanide exposures and releases, such as an upset in the operational water balance that presents a risk of exceeding the design containment capacity; problems identified by facility monitoring or inspection; and temporary closure or cessation of

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operations.

Procedures, Manual and Management Plans that consider non-standard operating situations and provide response actions include the Cyanide Management Plan, Emergency Management Plan (EMP); IR-21 Immediate Response to a Cyanide Incident; Emergency Response Team (ERT) Action Sheet 21 - Cyanide; Tailings Storage Facility Emergency Response Procedure; TGM Contaminated Water Containment Management Plan; Immediate Response Full Power Outage Procedure; and TGM Cyanide Facilities Decommissioning Plan. These documents consider a range of non-standard operating scenarios including loss of containment of process solutions; embankment failure; excessive seepage; pipe leakages or failures; pump failure; loss of power; overtopping events at the TSF or process water ponds; and exceedances in operating parameters of the tailings.

The TGM Cyanide Facilities Decommissioning Plan Management Plan (CFDP) contains strategies and actions in relating to temporary closure or cessation of operations which may occur due to situations such as work stoppages, lack of ore or other essential materials, economics, civil unrest, or legal or regulatory actions. The strategies identify the relevant sections of the Plan which contain actions to be taken to manage risks from temporary shutdowns. The CFDP contains strategies and actions for closure of the plant area including all cyanide facilities except the TSF in Section 5, closure tasks for the TSF in Section 7 and a decommissioning schedule in section 8. Section 5 of the CFDP includes strategies for Cyanide Stock Reduction; Pre-closure Tank Cleanout; Cyanide Disposal; Plant Clean-up; Emptying, washing and decontamination of High Strength and Medium Strength Cyanide Tanks; Decontamination of piping, bins, chutes, hoppers and pumps, instrumentation and concrete and Plant Removal, Dismantling and Demolition (for final closure).

TGM undertakes a broad range of inspections which cover all cyanide facilities including cyanide unloading and storage facilities; all tanks holding cyanide solutions; secondary containments; the TSF; process ponds; pipelines, pumps and valves. Inspections cover the integrity of cyanide facilities and signs of deterioration, signs of corrosion, the presence of fluids and other evidence of leakage, freeboard and available capacity, leak detection and collection systems.

TGM undertakes cyanide facility inspections on an established frequency to assure and document that they are functioning within design parameters. The frequency of inspections at TGM is appropriate to assure and document that they are functioning within design parameters. Frequency of inspections is outlined in the Cyanide Management Plan and area operating manuals and scheduled in INX.

Operational inspections of the TSF facilities, pumps and pipelines are conducted by the processing department on a daily basis which is appropriate for the purpose of detecting freeboard in storages, evidence of leaks or spills, pump flows and wildlife presence.

The TGM Processing (OPS) department undertakes 12 hourly inspections of the process plant,

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secondary containments, tailings storage facilities, process water pond and associated pipework and valving. These include integrity and capacity of bunding; condition and leaks of pipelines, pumps and valves; inspection of the TSF diversion drain; wildlife monitoring; available freeboard on the TSF and associated Process water pond. Area inspections are undertaken on a monthly basis and cover cyanide facilities within five areas: Reagents (cyanide unloading and storage facilities); Milling and High-Pressure Grinding Rolls (HPGR) screening; CIP/CIL and Elution circuits; Thickener, process water tanks and pond; and the tailings storage facilities.

Leak detection for all cyanide bearing tanks including the Cyanide Storage Tank is conducted monthly with all leak detection ports checked for the presence of liquids that would identify potential leakage from the tanks. Liquids are analysed for cyanide if present.

The process water pond has two HDPE liners with a leak detection system between them as well as a recovery pump to removes solutions This system is constantly monitored in SCADA, if water is detected between the liners the water recovery pump will cycle automatically to pump the water between the liners back into the pond. The number of cycles is recorded, and an alarm will sound in the control room if the cycles are above a certain threshold which will initiate an investigation of the pond.

Two groundwater monitoring bores are also located within the plant and are monitored monthly for groundwater levels and quarterly for cyanide.

The cyanide unloading and storage facilities are inspected during monthly Reagents Area inspections which cover the cyanide unloading facility and all hoses, valves and couplings used for unloading liquid cyanide. If any equipment requires maintenance, repairs or replacements or there are any other non-compliances then actions are raised in INX and work requests raised in SAP. Cyanide instrumentation checks are carried out on a 5-weekly basis.

Additional inspections are conducted by external consultants/organisations including annual cyanide storage area inspection by the cyanide supplier (AGR); annual TSF audits (conducted by an external Geotechnical Engineer); Cyanide Code Gap Audits and Dangerous Goods Audits which are conducted approximately every three years.

A 5-yearly Structural Inspection and Maintenance Management (SIMM) site-wide inspection program carried out by third-party engineers which undertakes a detailed assessment of infrastructure condition and integrity. All third-party inspection and audit reports are retained on site.

TGM does not operate heap leach pads.

All inspections are documented on forms and include the date, name of inspector and any observed deficiencies. Operational inspections identify all of the items to be inspected with each item ticked as compliant or not and comments recorded in the comments/non-conformance column. Corrective actions are identified on completed inspection sheets in an

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action's column.

All inspection records are stored electronically either as scans of hard copy documents or as electronic forms and retained for a period of at least three years.

Scanned copies of a cross section of completed monthly operations area inspections have been verified for the audit period for the five areas: Milling and HPGR; Leaching - CIP/CIL; Reagents; Thickener and Process Waters; TSF. Completed inspection records were not available for verification for the area inspections over a three-month period from October to December 2021 and for the Leaching circuit for a three-month period from Jan to March 2023. Inspections are also missing for some individual months with a total of 23 inspection records not retained following completion of the inspection. TGM provided demonstrated that records in SAP confirmed that that the inspections were conducted but the paperwork was not retained or was stored incorrectly. The memo concludes that with these missing inspections 'the deficiency was with the administration and record keeping of the job not the physical completion of the job.'

Additionally, a gap analysis conducted in 2022 found that underdrainage leak detection inspection paperwork was also identified as missing for November 2020, seven months in 2021 and six months in 2022 to July 2022. A memo provided to the auditor clarified that SAP records confirm that the inspections were undertaken with time allocated to the tasks and actions taken to following the inspections documented. The inspection tasks were all closed out as per procedures. Paperwork has been retailed for all leak detection inspections since August 2022, a period of 10 months to the time of the audit.

The auditor accepts TGMs conclusions, and that the deficiency did not result in a significant risk of cyanide release or worker exposure. It has been verified that hard copies of inspections have been retained for other periods. Actions taken by TGM to address this deficiency included assigning supervisors review inspections on a monthly basis to ensure they have been conducted; additional training of processing and maintenance staff who undertake inspections; and updating the Cyanide Management Plan to strengthen requirements for inspections to be conducted and documented. The auditor finds that no further actions are required.

TGM implements and documents preventative maintenance programs and activities to ensure that equipment and devices function as necessary for safe cyanide management. The preventative maintenance program is managed through SAP which is used to administer inspection schedules and record routine preventative maintenance activities. The program covers tanks, pumps, pipelines, valves and all critical plant and infrastructure.

Leach and CIL are emptied, inspected, and refurbished as required in sequence every two years which was undertaken by third party experts for most of the audit period but are now conducted by the TGM maintenance department. These inspections include tank integrity, thickness testing and condition of internal surfaces and coatings. The cyanide storage tank is emptied and refurbished every ten years which is considered appropriate with consideration of thickness testing and leak detection monitoring. The cyanide unloading and storage facility is

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externally inspected and audited annually by the cyanide suppliers AGR.

Inspections and preventative maintenance of key instrumentation is conducted regularly at appropriate frequencies as in accordance with the TGM Instrument Technician Operational Tasks Guideline. Preventative maintenance records are maintained in hard copy in document archives onsite and scanned and stored electronically in TGM systems. Records are entered and managed by the maintenance department and time stamped. All electronic records including all completed maintenance works are kept in the SAP system for period of at least three years. Records include the name of the person completing the inspection or works, signature, date, and relevant observations such as deficiencies.

TGM has necessary emergency power resources to operate pumps and other equipment to prevent unintentional releases and exposures in the event its primary source of power is interrupted. Four backup diesel generators are used to provide emergency power in the event of a blackout. Diesel generators are run on a monthly basis. Tests and inspections are documented electronically. TGM has the Immediate Response Full Power Outage Procedure to guide actions in the event of full loss of power.

Emergency power is limited and is sufficient only to operate nominated equipment which includes emergency alarms, lighting, and process control equipment systems. The requirement at TGM for back-up power to prevent an unintentional release of process solutions is limited due to the design features of the plant. There is only one section of gravity feed, from the CIL tanks to the tails thickener, and during a full power outage all other areas of the plant will completely stop because they require pumping. In a power outage situation, all the solids from the gravity feed settle in the thickener and the water overflows to the process water pond. If the process water pond fills up it reports to the event pond which has sufficient capacity (8588 m³) to store the design rainfall event plus drain back plus the contents of the largest tank. The worst-case scenario of 90 minutes gravity feed at maximum flow would result in a volume of 2100 m³ which can be contained in the event pond without the requirement of emergency generators to pump solution away.

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Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

	☑ in full compliance with	
The operation is	$\hfill\Box$ in substantial compliance with	Standard of Practice 4.2
	$\square$ not in compliance with	
Summarize the basis for t	his Finding/Deficiencies Identified:	

TGM is in FULL COMPLIANCE with Standard of Practice 4.2: Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

TGM uses a variety of systems and management to optimise cyanide use, control the cyanide concentrations throughout the leaching circuit and achieve WAD cyanide targets in the final tails.

TGM continues to implement a program to evaluate cyanide use in the processing plant to determine appropriate cyanide addition rates and adjust cyanide addition rates as necessary when ore types or processing practices change the cyanide requirements.

Initial cyanide addition rates were determined using metallurgical test work done on representative ore samples prior to commissioning of the plant. TGM continuously implements a cyanide (leach) optimisation strategy through monitoring programs to minimise cyanide use while achieving optimal economic gold recovery.

The TGM mill feedstock consists of several ore sources which are blended for processing. A Blend Plan and Ore Distribution Chart is used to determine the ore feed blend. It identifies the ore blend by material type, stockpile location (number) and ratio of the different ores.

TGM optimises cyanide use and determines cyanide addition rates using a range of data sources from the leach circuit including automated cyanide analysers, pH probes dissolved oxygen (DO) probes and manual chemistry sampling. TGM also monitors WAD cyanide concentrations in the final tailings slurry using an automated WAD analyser. Tails samples are analysed on a daily basis to determine gold recovery rates.

A Daily Leach Optimisation Report is produced by the Production Metallurgist, and this is used by the metallurgy department to track changes in the ore characteristics and cyanide consumption for the different ore types. This report determines optimal cyanide addition rates based on data collected and determines the cyanide addition set point.

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The set point for cyanide addition is controlled through SCADA via the Leach Feed Distribution Box Cyanide Addition Feedback Control page. Set points are communicated using a set points sheet which is distributed to the processing team.

Weekly 'mill feed' meetings are held with representatives from the metallurgy, mining and geology department to discuss the ore blend, grade and characteristics for the next week. An investigation with a sampling trial is run when required to understand unexpected changed in the leach kinetics.

Leach Optimisation Projects (studies) are undertaken as required to improve throughput and recovery. A study in 2015 resulted in two new leach tanks installed as pre-oxidation tanks which resulted in a 14% reduction in cyanide consumption. A study in 2017 resulted in a reduction of about 20% in cyanide use between 2018 and 2020.

Metallurgical test work is done on any new ore bodies that are discovered. Metallurgical test work is conducted yearly on ore zones that will be treated in the following year including WAD cyanide consumption. One new ore source was assessed during the audit period with metallurgical test work conducted by ALS on the Tropicana underground ore in 2021-22 to assess the influence of slurry pH and cyanide solution strength on the gold leaching performance.

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Implement a comprehensive water management program to protect against unintentional releases.

	☑ in full compliance with	
The operation is	$\hfill \square$ in substantial compliance with	Standard of Practice 4.3
	$\square$ not in compliance with	
Summarize the basis for th	is Finding/Deficiencies Identified:	

TGM is in FULL COMPLIANCE with Standard of Practice 4.3: Implement a comprehensive water management program to protect against unintentional releases.

TGM continues to implement a comprehensive, probabilistic water balance (PWB), developed by third-party hydrogeological consultants. The modelling software uses the probabilistic Monte Carlo simulation to account for uncertainties in inputs.

The PWB is maintained and run according to the TGM Site Water Balance procedure for the Cyanide Code. The model was last updated in March 2023 to include site changes in water circuitry, water storage and water use and to update the stochastic climate module including latest rainfall and evaporation data.

The model has the capacity to run probabilistic simulations and also event-based simulations for defined rainfall events and operational scenarios. The user views and operates the program using a dashboard and conceptual flow diagram which shows the water circuitry including all water and solution storages and linkages.

The PWB incorporates all major slurry (a) and water flows between the processing plant, TSF, raw water storages and borefields.

The TGM probabilistic water balance model considers the following aspects in a reasonable matter as appropriate for the facilities and environment; the rates at which solutions within tailings are deposited into tailings storage facilities; a design storm duration and storm return interval that provides a sufficient degree of probability that overtopping of the pond or impoundment can be prevented during the operational life of the facility; the quality of existing precipitation and evaporation data in representing actual site conditions; the amount of precipitation entering a pond or impoundment resulting from surface run-on from the upgradient watershed, including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground; the model considers solution losses from seepage and evaporation; the effects of potential power outages or pump and other equipment failures for emergency removal of water from a facility.

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Discharge to surface waters does not occur at TGM.

No leach pads exist at TGM.

Freezing and thawing of tailings and process solutions are not applicable to TGM due to its location/climate.

PWB model runs are undertaken on a monthly basis including for an average case as well as the design storm event and a TSF pump failure scenario. The storm event modelled is a 1 in 100-year 72-hour average recurrence interval (ARI) event (167 mm of rainfall) which is the industry standard use for water balance modelling.

TGM is remote and there is no Bureau of Meteorology weather station or no long-term rainfall records for the region. Rainfall records have been collected on a daily basis at Tropicana aerodrome since 2013 however this is not sufficient for rainfall modelling. Due to the lack of rainfall records the PWB uses a reconstructed daily rainfall and evaporation data set for the site obtained from the Queensland Department of Environment and Science's SILO Data Drill database. The SILO database (https://www.longpaddock.qld.gov.au/silo/) provides nationwide point and gridded climate data for the period 1889 to the present and is constructed from observation data by the Bureau of Meteorology.

The TSF is operated in accordance with the licenced minimum freeboard of 500 mm which is adequate to contain the event of 1 in 100-year 72-hr average recurrence interval (ARI) design event. Actual freeboard at the TSF was estimated at 5.2 meters in March 2023 in the PWB model run.

The process water pond and event pond are operated with a minimum of 300mm freeboard as required by the Western Australian Department of Environment Regulation (DER) Licence L8676/2012/1. The event pond is managed to ensure that it is no more than 24% full to maintain secondary containment capacity requirements. The process water pond has a level sensor and if either pond is above its operating capacity water can be pump to the process circuit or directly to the TSF which has significantly larger storage capacity if required.

No overtopping of ponds or impoundments has occurred during the recertification period.

TGM Operating procedures incorporate inspection and monitoring activities to implement the water balance and prevent overtopping of ponds and impoundments and unplanned discharge of cyanide solutions to the environment. This includes twice daily inspections and a monthly area inspection by operations personnel of the TSF and Process Water Pond in accordance with the Process Technician - Day Services Guideline. The inspections include checks of the tails distribution pipeline and return water line for leaks or damage, signs of any seepage or erosion and freeboard capacity on the TSF and Process Water Pond.

Annual third party TSF audits are conducted and include an inspection of the tailings discharge network, decant infrastructure, underdrainage, embankment and walls, surface water diversion channel and freeboard.

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Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

	$oldsymbol{arnothing}$ in full compliance with	
The operation is	$\square$ in substantial compliance with	Standard of Practice 4.4
	$\square$ not in compliance with	
Summarize the basis	for this Finding/Deficiencies Identified:	

TGM is in Full COMPLIANCE with Standard of Practice 4.4: Implement measures to protect birds, other wildlife, and livestock from adverse effects of cyanide process solutions.

TGM has implemented a cyanide procedure to prevent open waters which contain cyanide from exceeding 50mg/L WAD cyanide. Open waters that contain cyanide include the TSF process water pond.

The TSF is partially fenced to prevent ambulatory fauna access. The non-fenced areas abut an adjacent waste adjacent landform which is constructed at angle of repose walls and restricts fauna egress.

In previous audits TGM has achieved compliance with Standard of Practice (SOP) 4.4 using an alternative compliance measure based on hyper-salinity (> 50,000 mg/L Total Dissolved Solids (TDS)) of tailings and process solutions providing a protective mechanism against wildlife cyanosis. Prior to commencement of operations TGM commissioned a study to determine and implement the processes to achieve certification with this alternative measure to meet the objective of SOP 4.4 even with tailings discharge of above 50 mg/L WAD cyanide. The findings of the study that hypersalinity did form a protective mechanism against wildlife cyanosis was accepted by Code auditors and the Code in the initial and subsequent re-certification audits.

This method of achieving compliance with SOP 4.4 is still available to TGM however continuous improvements in cyanide optimisation have resulted in TGMs ability to continuously discharge tailings at less than 50 mg/L WAD cyanide throughout this audit period. This coincided with an improvement in the quality of process water which was consistently less than 50,000 mg/L TDS. TGM's method of compliance with SOP 4.4 was therefore not based on the protective mechanism of hypersalinity during this audit period and it is achieved in the typical manner within the industry of maintaining tailings at less than 50 mg/L WAD cyanide.

Since the last re-certification audit (to 27 May 2023), there have been two days where TSF spigot monitoring results were confirmed as above 50 mg/L WAD cyanide. The two exceedances were recorded in 2021, 58.9 mg/L WAD cyanide on 26 April and 51.9 mg/L WAD

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cyanide on 20 June with salinity readings of 34,776 mg/L TDS on both days. There was also one exceedance of 51.8 mg/L WAD cyanide on 16 November 2020 in the process water discharge to the process water ponds. Wildlife monitoring was conducted on all three days when exceedances occurred and none of the exceedance resulted in recorded wildlife mortalities hence an environmental impact is considered not to have occurred. The exceedances are considered to be isolated incidents and TGM took appropriate actions. Consequently, it is the auditor's conclusion is that no further actions are required to address the deficiency and it is therefore determined that TGM is in full compliance with 4.4.2.

TGM monitors for wildlife and WAD cyanide concentrations in open water on a daily basis. The wildlife monitoring regime is considered by the auditor to be adequate to record wildlife mortalities. The observations are conducted by site personnel who have received specific wildlife observation training by the environment department and/or third-party experts. Wildlife observations are recorded on the TSF inspection sheet either in hard copy or electronic form. These are retained, and results are consolidated into the TSF and Process Water Pond Bird Inspections spreadsheet. Electronic copies of TSF inspections were verified for each month of the audit period. Wildlife monitoring has been conducted on all days throughout the audit period including the days of exceedances occurred.

Six wildlife mortalities were recorded within the TSF during the audit period, and two were recorded in the process plant. A wildlife incident was reported in INX on each of these occasions and an investigation conducted by a third party which was reported as a memo to the TGM Processing Department. No wildlife mortalities have been attributed to cyanide by investigations and it is considered that no environmental impact occurred due to cyanide.

No heap leach operations exist at TGM.

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Implement measures to	protect fish and	d wildlife fro	m direct	and in	ndirect	discharges	of a	cyanide
process solutions to surf	ace water.							

	☑ in full compliance with	
The operation is	$\hfill\Box$ in substantial compliance with	Standard of Practice 4.5
	$\square$ not in compliance with	
Summarize the basis for the	nis Finding/Deficiencies Identified:	
	NCE with Standard of Practice 4.5: Imple indirect discharges of cyanide proc	·
cyanide facility and there	o direct or indirect discharge to surfac are no mixing zones. There is no surfa ce water body is Lake Rason, an epher y from site operations.	ce water down gradient of the
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Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

	$oldsymbol{arnothing}$ in full compliance with	
The operation is	$\hfill \square$ in substantial compliance with	Standard of Practice 4.6
	$\square$ not in compliance with	
Summarize the basis for t	his Finding/Deficiencies Identified:	

TGM is in FULL COMPLIANCE with Standard of Practice 4.6: Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of ground water.

TGM implements specific water management strategies and other measures to manage seepage and spills.

There is no beneficial use of ground water beneath and/or immediately down gradient of the operation.

All cyanide facilities within the process plant are equipped with concrete secondary containment to ensure the protection of groundwater quality. All cyanide bearing tanks have secondary containments which effectively manages potential seepage. All tanks in the leach and Elution circuit as well as the tailings thickener are contained within a single secondary concrete containment and therefore have an impermeable barrier between them and the ground.

Seepage and spill management for the tailings pipeline and TSFs and process ponds include a bunded tailings and return water pipeline corridor, HDPE lined process ponds, tailings deposition techniques, appropriate freeboard, and groundwater monitoring and recovery bores which were all verified during field inspections.

TGM monitors for WAD cyanide on a quarterly basis at 18 Regulatory TSF monitoring bores, two environmental monitoring bores (within the plant), 21 Regulatory TSF recovery bores and the TSF trench bore. The conditions of TGM's Licence L8676/2012/1 issued by the Government of Western Australia Department of Water and Environmental Regulation (DWER) do not include a limit for WAD cyanide, Free cyanide, or Total cyanide within groundwater.

Groundwater levels of bores around the TSFs are monitored on a monthly basis. A rise in groundwater levels has been detected in the pervious audit period and a network of groundwater recovery bores have been installed.

A third-party audit of TSFs is undertaken annually and includes a review of groundwater quality

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data, water recovery and management of the TSFs in general.

The tailings and return water lines contained within bunding was verified to be in adequate condition during the site inspections. The tailings and process water return pipelines are equipped with flow meters which have telemetry to monitor the flow in the pipes and report back to the control system. The Daily TSF and Process Water Dam (PWD) Inspection includes the tailings and return water pipelines and to look for leaks from the pipeline and pipe breathers.

The TSF Operation Manual identifies inspections of the TSFs and associated pipelines and contains actions to be taken if a tailings or process solutions spill occurs.

TGM does not use mill tailings as underground backfill and therefore does not have a paste plant for backfill.

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Provide spill prevention or containment measures for process tanks and pipelines.

	☑ in full compliance with	
The operation is	$\hfill \square$ in substantial compliance with	Standard of Practice 4.7
	$\square$ not in compliance with	
Summarize the basis for thi	s Finding/Deficiencies Identified:	

TGM is in FULL COMPLIANCE with Standard of Practice 4.7: Provide spill prevention or containment measures for process tanks and pipelines.

TGM continues to provide a number of measures for spill prevention or containment for all cyanide unloading, storage and process solution tanks. No cyanide mixing tanks exist at TGM.

All cyanide unloading activities takes place on a bunded and sealed concrete pad. Any spills on the unloading pad drain to a sump in the cyanide storage compound which can then be pumped to the start of the leaching circuit. The Cyanide Storage Tank is contained within a concrete secondary containment bunded designed to contain 110% of the tanks volume plus a 1 in 100 72-hour rainfall event.

All process tanks, including Pre-oxidation, CIL and Elution tanks and the Tailings Thickener are located within a single secondary concrete containment bund. Leach tanks are designed with overflow launders and overflow pipes directing overflow water to the bund to prevent overtopping.

The cyanide storage tank and all tanks within the CIL circuit have an HDPE liner installed below the tank which acts as an impermeable barrier between the tank and the ground. Leak detection is installed above the HDPE liner with any leaks reporting to a port at the side of the tank which is inspected monthly. The cyanide storage tank also has oil impregnated sand to act as a further barrier between the tank and the natural surface.

Sump pumps are installed at a number of locations within the plant secondary containment bund to return any spillage to the nominated process tank within the plant and are monitored via the SCADA system. Where safe to do so, sump pumps are programmed to start up automatically when the level in the bund reaches trigger levels. The cyanide storage area sump pump has a high priority alarm when the level reaches the High and High High levels, but this pump does not start up automatically for safety reasons. The process water pond and event pond levels are monitored in SCADA and High and High level alarms are also installed at both process and event ponds.

The mill scats contain process solution and are manually cleaned out according to the CIL Leach

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area specific operating manual. These are located within the process area secondary containment.

The process water pond and event pond are constructed with a 1mm HDPE bottom liner, 1.5mm HDPE top liner and a drainage material between the liners for leak detection. If water is detected between the liners the water recovery pump will cycle automatically to pump the water between the liners back into the pond. This pump is monitored through SCADA and an alarm is triggered if the is operating above a pre-determined threshold. This will trigger an investigation into the operation of the pump. The overflow channel from the process plant to the event pond is lined with impermeable HDPE.

The process water storage pond is operated within the design freeboard of 300 mm and freeboard and the event pond is maintained at a maximum 24% full to ensure required capacity is maintained for potential overflow and storm events. These ponds are inspected during daily inspections.

Two groundwater monitoring bores are located within the processing plant to evaluate ground water levels and cyanide concentrations. The monitoring results from these bores are used to detect any leaks from the process circuit, the bottom liner of the process water pond and the event pond.

Process solution spills are logged into the INX system and investigated in accordance with incident reporting procedures to determine causes, evaluate preventative measures and prescribe actions.

Secondary containments for cyanide unloading, storage, and process tanks are sized to hold a volume greater than that of the largest tank within the containment and any piping draining back to the tank, and with additional capacity for the design storm event. The capacity of the containment bunds was resurveyed in 2023 for areas where construction or modifications have occurred since 2014 including the addition of a second ball mill, a slurry line and recently the addition of pumping infrastructure at the TSF. A TSF Booster station was constructed within this audit period and the catchment for this and the and slurry line between the TSF and the booster station does not report to the Event Pond. Containment for this area is therefore calculated separately.

No mixing tanks exist at TGM.

Procedures are in place and are implemented to prevent discharge to the environment of any cyanide solution or cyanide contaminated water that is collected in a secondary containment area.

Any spills on the unloading pad drain to a sump in the Cyanide Storage Compound which is sized to contain the volume of an isotainer. This sump has an automatically triggered pump that returns water to the process plant. Spills that occur during cyanide unloading are hosed into the sump as required by the TGM Cyanide Unloading Work Instruction and the CSBP Solution

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Sodium Cyanide unloading at Mine Sites Procedure. The Cyanide Unloading Work Instruction requires the TGM operator to inspect the Cyanide Storage Compound sump prior to unloading and following unloading to ensure it is empty and pump solutions away from the sump if required.

Clean up of cyanide or process solutions spillage external to containment areas occurs in accordance with the Cyanide Spill Response Procedure, Immediate Response Cyanide Incident Procedure and where the ERT are called out ERT in accordance with the Action Sheet 21 Cyanide Incident.

The tailings pipeline between the TSF and the plant is contained in an unlined earth bund. It has an emergency dump valve and any material released into the bund in an event must be removed manually. The procedure for using this valve and how to clean the bund are contained in the Cyanide Spill Response Procedure.

Inspections of secondary containments by operations personnel are included in the Daily CIL Short Shift Inspection, Monthly Milling and HPGR Screening Inspection; Monthly Thickeners, Process Water Tank and Ponds Inspection; and the Monthly CIL and Elution Inspection.

TGM provides spill prevention or containment measures for all cyanide process solution pipelines to collect leaks and prevent releases to the environment. All the cyanide containing pipelines within the plant and cyanide storage area have a secondary containment constructed of concrete or a HDPE liner. The tailings and return water pipelines are placed above ground within a soil bunded area. The tailings and return water pipeline have flow meters on the plant and discharge ends, detecting any sudden changes and relaying the message to the operations centre. If the online flow deviation on the tails slurry line stays high for a specified time it will automatically trip the tails slurry pumps and require investigation before restarting. The TSF and Return Water Pipeline are inspected for leaks as part of the daily TSF inspections. The tails line has an emergency dump valve and bund between the processing plant and the TSF. This bund is not lined and has to be cleaned out manually. The procedure for using the valve and how to clean the bund is included in the area specific operating manual. The pipelines have isolation valves to allow for maintenance.

Tailings and return water pipelines are not in close proximity to any ephemeral drainage lines which may contain surface water for only short periods of time.

All process tanks, including Pre-oxidation, CIL and Elution tanks and the Tailings Thickener are constructed of mild steel, typically lined with abrasion and corrosion resistant synthetic poly coatings. Cyanide bearing pipes including the tailings and return water pipelines are mostly constructed of high-density polyethylene (HDPE) material which is compatible with cyanide and high pH and meets specifications and Australian Standards required for containment of cyanide. The cyanide dosing line is made of 316L grade stainless steel is recommended by AGR. Some cyanide bearing pipelines are constructed of mild steel. Pumps and fittings are constructed of mild steel or HDPE.

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Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

	☑ in full compliance with	
The operation is	$\square$ in substantial compliance with	Standard of Practice 4.8
	$\square$ not in compliance with	
Summarize the basis for thi	is Finding/Deficiencies Identified:	

TGM is in FULL COMPLIANCE with Standard of Practice 4.8: Implement quality control/quality assurance (QA/QC) procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

Quality control and quality assurance programs have been implemented during construction of all new cyanide facilities and modifications to existing facilities, including cyanide unloading, storage, and other cyanide facilities. No cyanide mixing facilities exist at the TGM.

Cyanide facilities that were constructed or modifications during this audit period included TSF Wall raises, a TSF Pipeline booster Station, and a duty swap of the Leach Feed Thickener and Tailings Thickener. QA and QC programs were implemented for these facilities and documentation was audited and found to be compliant during the audit.

Knight Piesold are the Engineer of Record for the TSF at TGM and signed off on the TSF wall raises. The Leach Feed and Tailings Thickener Duty Swap Project was managed by a TGM Engineer with responsibilities assigned to the TGM Superintendent Metallurgy/Technical Services, Production Metallurgist (Cyanide Code Champion), Manager Metallurgy and TGM Construction Supervisors. Contract work was signed off by responsible people for each of the contracting companies for example the Project Engineer for FLSmidth.

The previous audit verified that appropriately qualified persons reviewed QA and QC documentation for cyanide facilities that were constructed within the previous audit period.

All QA/QC documentation for construction of cyanide facilities has been retained and is available on site. This was confirmed and verified during this audit.

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Implement monitoring programs to evaluate the effects of cyanide use on wildlife, and surface and groundwater quality.

	☑ in full compliance with	
The operation is	$\square$ in substantial compliance with	Standard of Practice 4.9
	$\square$ not in compliance with	
Summarize the basis for this Finding/Deficiencies Identified:		

TGM is in FULL COMPLIANCE with Standard of Practice 4.9: Implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and ground water quality.

TGM has developed, maintained and implemented written standard procedures for all wildlife, surface and ground water quality monitoring activities. These include the Environmental Compliance Water Monitoring Procedure; Groundwater Monitoring Procedure; Water Monitoring Sample Collection, Storage and Dispatch Work Instruction; Dispatch of Goods Procedure; Wildlife monitoring procedure for the Tropicana Process Water Pond - Standard Operating Procedure; Tailings Facility Wildlife Monitoring Procedure and Environmental Monitoring Record Keeping and Data Entry - Work Instruction. Forms have been developed for each monitoring activity either as hard copies, or electronic based forms.

Procedures specify how and where samples should be taken, sample preservation techniques, chain of custody procedures, shipping instructions, cyanide species to be analysed and quality assurance and quality control requirements for cyanide analyses.

Sampling and analytical protocols have been developed by an appropriately qualified person. All personnel who have developed procedures have a minimum qualification of a Bachelor degree in Environment Management. Sign-off of procedures is by appropriately qualified Superintendents and Managers all of whom have a minimum qualification of a Bachelor degree.

Sampling conditions, livestock/wildlife activity, cloud cover, wind, precipitation, and temperature are recorded on wildlife and water monitoring field sheets and recorded within the monitoring database.

Monitoring is conducted at frequencies adequate to characterize the medium being monitored and to identify changes in a timely manner.

The TSF supernatant and spigot and the process water pond are all sampled on a daily basis and anlysed on site for WAD cyanide, salinity and pH. Wildlife monitoring is conducted on a daily basis.

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Groundwater quality monitoring for WAD cyanide and metals is undertaken on a quarterly basis as determined by the Western Australian DWER Licence conditions.

Groundwater levels and field readings of pH, EC, TDS, and Temperature are monitored on a monthly basis.

WAD cyanide at the last tank in the CIL circuit is monitored continuously by the WAD analyser which produces hourly readings.

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# **Principle 5 | DECOMMISSIONING**

Protect communities and the environment from cyanide through development and implementation of decommissioning plans for cyanide facilities.

# **Standard of Practice 5.1**

Name of Mine

Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife, livestock, and the environment.

	☑ in full compliance with	
The operation is	$\hfill \square$ in substantial compliance with	Standard of Practice 5.1
	$\square$ not in compliance with	
Summarize the basis for th	is Finding/Deficiencies Identified:	
	ICE with Standard of Practice 5.1: Plan of cyanide facilities to protect humar	·
operations with the Cyanid Cyanide Facilities Decomm demolition, and post shutc	n procedures to decommission cyanicle Facilities Decommissioning Plan annissioning Plan addresses pre-closure lown tasks including cyanide stock readd medium strength cyanide tanks, p	nd the Mine Closure Plan. The tasks, decontamination, duction, cyanide disposal,
schedule that starts 24 mor includes steps associated v	ide Facilities Decommissioning Plan in hths prior to closure and continues 24 with cyanide safety and training, reduce and dismantling/ demolition, and wat wo years.	4 months post closure. This cing stocks of cyanide,
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### **Standard of Practice 5.2**

Name of Mine

Establish a financial assurance mechanism capable of fully funding cyanide-related decommissioning activities.

	☑ in full	compliance with			
The operation is	$\square$ in sub	stantial complian	ce with	Standa	ard of Practice 5.2
	$\square$ not in	compliance with			
Summarize the basis for this	s Finding/	Deficiencies Ident	ified:		
TGM is in FULL COMPLIANO mechanism capable of fully					
TGM has developed an esticyanide-related decommiss Decommissioning Plan and separate calculated cost for Decommissioning cost estir is reviewed and updated arparty.	sioning m the Mine Cyanide mates are	easures as identife Closure Plan. The Code specific de based on third-p	fied in its Pre e TGM Closu contamination party rates. The	liminary ure Cost on activ ne TGM	y Cyanide Facilities t Model includes a ities. Closure Cost Model
TGM has established a finar the estimated costs for cyar decommissioning and closu Safety (DMIRS) has establish operations to pay an annua period.	nide-relate ure strate ned the M	ed decommissior gy. The Departme Iine Rehabilitation	ning activities ent of Mines, n Fund (MRF	as ider Industr ). The M	ntified in its y Regulation and IRF requires mining
In addition, TGM parent condecommissioning and restorable Obligation (ARO) for finance Accounting Standard 37 Proreviewed and updated annual audited by an external finance.	oration. The ial report ovisions, ( ually base	he Financial Liabi ing and disclosur Contingent Liabil ed on the TGM Cl	lity Cost Estir e, complying ities and Cor	mate or gwith that ntingent	Asset Retirement le International Assets (IAS 37) is
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# **Principle 6 | WORKER SAFETY**

Protect workers' health and safety from exposure to cyanide.

### **Standard of Practice 6.1**

Name of Mine

Identify potential cyanide reduce and control them.	e exposure scenarios and take measur	es as necessary to eliminate,
	☑ in full compliance with	
The operation is	$\hfill\Box$ in substantial compliance with	Standard of Practice 6.1
	$\square$ not in compliance with	
Summarize the basis for th	nis Finding/Deficiencies Identified:	
	NCE with Standard of Practice 6.1: Ide res as necessary to eliminate, reduce	
minimise worker exposure	edures describing how cyanide-relate e. These include procedures for unloa equipment decontamination prior to s.	ading, plant operations, entry
written procedures and Sacontrols for the area, and operation of the area. Safewith detailed instructions	uals for each part of the plant operation afe Work Instructions. Operating man the processes necessary for the safe a e Work Instructions and Procedures d outlining steps taken to complete a ta what PPE and permits are required.	uals include hazards and and environmentally sound escribe cyanide related tasks
address pre-work inspective requirements for carrying completion of checklists punloading. The requirements stipulated in Safe Work Institute the use of Homanage (SLAM) Process expenses the street of the street o	where necessary, the use of personal processors. Safe Work Instructions and Processors. Safe Work Instructions and Processors the tasks. Where appropriate the prior to the commencement of a task, and for using PPE is addressed in all instructions and Site Specific Procedures CN gas detectors in designated areas encourages pre-work inspections as proceformed prior to completing any tasks.	edures all identify the PPE procedures require the for example prior to cyanide ductions and training, is es, and by signage in plant areas. The Stop, Look, Assess, art of the basic and fast risk
TGM solicits and actively o	considers worker input in developing	and evaluating health and safety
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procedures Daily Pre-Shift Information Meetings (PSIs), Weekly Department/Workgroup Meetings, Registered Managers Weekly Health, Safety and Environment Meetings, Monthly work group Toolbox Meetings, Health and Safety Committees and Employee Elected Representatives.

Workers are encouraged to raise hazard reports, and these are discussed in daily pre-start meetings. The hazard investigation evaluates the relevant safety procedures with the involvement of the person/ team who raised the hazard, which may prompt a review of the procedure.

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#### Standard of Practice 6.2

Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

	☑ in full compliance with	
The operation is	$\hfill\Box$ in substantial compliance with	Standard of Practice 6.2
	$\square$ not in compliance with	
Summarize the basis for t	his Finding/Deficiencies Identified:	

TGM is in FULL COMPLIANCE with Standard of Practice 6.2: Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

TGM has determined the appropriate pH for limiting the evolution of hydrogen cyanide gas during production activities. The optimum working pH for the TGM mill is 9.6 to maintain protective alkalinity and prevent the evolution of hydrogen cyanide gas. The pH of the leach tanks is constantly measured by a static in-tank pH probe and verified during operator sampling rounds. Alarms are inbuilt in the Mill Control system – High alarm at pH 10, low alarm at pH 9.0-9.1 and low-low alarm at pH 8.8.

TGM has identified areas and activities where workers may be exposed to cyanide in excess of 10 ppm on an instantaneous basis and 4.7 ppm continuously over an 8-hour period and require use of personal protective equipment in these areas or when performing these activities. TGM has identified that the whole wet plant area from the HPGR screening to the TSF is classified as cyanide facilities, as process water is re-used in the process. Therefore, personal HCN gas monitors are a mandatory PPE requirement and must be worn for entry to all cyanide areas of the processing plant. HCN monitor PPE sign-was observed in the field inspection to be posted at the entrances of the Processing Plant. The need for wearing HCN monitors in the processing plant is included in the induction process and in written procedures.

TGM uses cyanide monitoring devices in processing areas and for activities involving management of cyanide to confirm that workers are not exposed to hydrogen cyanide gas exceeding 10 ppm on an instantaneous basis or 4.7 ppm continuously over an 8-hour period. TGM uses both fixed and personal HCN gas monitors to verify that controls are adequate to minimise the evolution of HCN gas from process slurries and solutions. No monitoring for cyanide dust occurs, as only liquid sodium cyanide solution is used.

Fixed HCN monitoring devices are located in process areas identified as high risk to confirm that workers are not exposed to hydrogen cyanide gas exceeding 10 ppm on an instantaneous

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basis. Fixed HCN Monitors are located in the following 12 locations: Leaching Tank, CIL Hut, Loaded Carbon Screen, Elution Columns, Final Tails Sampler, Cyclone Underflow, HPGR Screens/ wet screens, Trash Screens, Carbon Safety screens, Cyanide Storage area, Ball Mill 2 Discharge Launder, Ball Mill 2 Cyclone Cluster. The static HCN monitors will generate an audible alarm and flashing light at levels higher than 10ppm and won't clear until levels are below 9 ppm. Fixed HCN Meters Calibration Procedure outlines the actions to be taken when levels are over 10 ppm.

It is mandatory to wear a personal HCN monitor (Gas Alert Extreme Detectors) in designated areas of the plant. Signs indicating personal HCN monitors are to be worn are located at the entrances to the cyanide containing areas of the processing plant (ie at the bottom of each set of stairs). Personal HCN Monitor Calibration and Data Transfer Procedure outlines the trigger alarms on the personal monitors, and actions to be taken at different concentrations.

Hydrogen cyanide monitoring equipment is maintained, tested and calibrated as directed by the manufacturer, and records are retained for at least three years.

Weekly checks are performed on all Fixed HCN monitors by a trained instrument technician. The fixed monitors are also calibrated every six months by a certified instrument technician. Calibration records were observed for the duration of the audit period.

Personal HCN detectors are checked, and bump tested before use. Bump Tests are performed on each personal HCN Gas Monitor at least weekly. The Personal HCN Gas Monitor has a preset calibration duration of 90 days. Once this 90-day time frame has elapsed the monitor will alert its operator of the need for calibration via an on-screen message.

Bump tests records are retained and stored electronically, and each unit can be searched with the full testing history visible. Viewed the computer screen showing the search tools. Calibration records for all hydrogen cyanide monitoring equipment is retained on site for a minimum of three years.

Warning signs have been placed at strategic locations where cyanide is used to advise workers that cyanide is present and notify of any necessary personal protective equipment that must be worn, and that smoking, open flames and eating and drinking are not allowed. Signage around the cyanide unloading facility includes: Cyanide warning signs and prohibition to entry storage compound; PPE requirement signs, including the use of personal HCN monitors, gloves and goggles, and protective clothing; No smoking, No Naked Flames, No eating or drinking. Signage in the processing plant includes: Signs indicating personal HCN monitors to be warn are located at all stairways into the processing areas that contain cyanide solutions; Sign saying "DANGER No entry on red light (HCN Gas)" in an area near the final tails sampler. Signage at the TSF includes signs on the pipelines.

Red carmosine dye is added to all sodium cyanide solutions by AGR prior to delivery for identification. High strength cyanide solution was observed to be red at the cyanide additions point on the leach tanks.

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Safety showers, low-pressure eyewash stations and dry powder fire extinguishers are located at strategic locations throughout the operation, and they are maintained, inspected and tested on a regular basis. Safety showers, low pressure eyewashes and fire extinguishers are in various locations including the cyanide delivery, cyanide storage, on top of leach/CIL tanks, and elution area. The Safety showers, low pressure eyewashes and fire extinguishers are checked as part of the monthly safety inspections. Only dry chemical powder (DCP) extinguishers are available within the leach and CIL tanks, gold room and cyanide storage areas. The fire extinguishers are inspected and serviced on a six-monthly frequency by an independent contractor. Records of the fire extinguisher services are kept electronically and were reviewed over the audit period.

Unloading, storage, mixing and process tanks, process pipework and tailings piping containing cyanide are identified to alert workers of their contents, and the direction of cyanide flow in pipes is designated. The site inspection confirmed that tank and pipe labelling was present but was faded in some areas.

All Safety Data Sheets (SDS), first aid procedures and cyanide safety information are written in English, which is the language of the workforce and are available in areas where cyanide is managed Printed copies of SDS and procedures are at the Spotters Hut and WAD Cyanide Hut. Electronic SDS are available via ChemWatch (accessed via the TGM Safety Kiosk). The AGR Sodium Cyanide Unloading Procedure is printed on a permanent metal sign in English, at the unloading bay, along with Emergency information including the AGR Phone number. All Manuals, Procedures and Work Instructions are available from the TGM Safety Kiosk which is accessible by all site personnel and also able to be printed from a touchscreen in the main office.

TGM has a procedure to investigate and evaluate all cyanide exposure incidents to determine if the operation's programs and procedures to protect worker health and safety, and to respond to cyanide exposures, are adequate or need revising. TGM Incident Management Guide outlines the incident investigation process for all incidents and states that an incident involving Sodium Cyanide or HCN exposure will be required to be investigated. Cyanide related Incidents which involved worker safety in the period have been reported and investigated which have resulted in amendments to procedures and PPE. Actions arising from the incidents reviewed by the auditor included: reviewing a sampling procedure to include sample points and hazards; reviewing and updating the pipeline labelling procedures particularly for parallel pipelines to include the point of origin and destination of discharge; developing a position appropriate training course (including non-standard tasks like shutting down or ramping up after a shut-down) to ensure that all Control Room Operators are deemed competent to carry out the various tasks in the control room.

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#### **Standard of Practice 6.3**

Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

	☑ in full compliance with	
The operation is	$\hfill \square$ in substantial compliance with	Standard of Practice 6.3
	$\square$ not in compliance with	
Summarize the basis for t	this Finding/Deficiencies Identified:	

TGM is in FULL COMPLIANCE with Standard of Practice 6.3: Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

TGM has oxygen, resuscitators, antidote kit, and a radio system for communication and emergency notification readily available for use at the cyanide unloading and storage locations and elsewhere in the plant.

Medical oxygen cylinders and oxygen delivery masks and resuscitator (OxySok's) are stored in four locations - cyanide unloading observers' hut, gold room, the control centre, and the ambulance. Bulk oxygen bottles are stored at the medical clinic and in the Emergency Vehicle. The Cyanide Unloading Spotters Hut was verified during the site inspections as containing OxySok and Self-inflating Resuscitator.

All personnel working in cyanide areas including the cyanide unloading area, processing plant, tailings pipeline corridor, tailings storage facilities and processing ponds are required to carry two-way radios. This is the primary means for raising an emergency, and for communication during an emergency. The safety showers and eye wash stations activate an alarm at mill control when they are used.

The cyanide antidote used is Cyanokit, which is stored at the Medical Centre only, at the recommended temperature (25°C). It is to be administered by site nurse under authorisation by a doctor or the Royal Flying Doctors Service (RFDS). There are two boxes of Cyanokit within the expiry date.

Respirators and appropriate hydrogen cyanide canister filters are stored in blue hard cases in four locations in the processing plant - elution area, acid storage area, entrance to trash screens and carbon safety screens, and the entrance to the ball mill deck. Field inspection observed these were all at the signposted locations and contained the required items. The Cyanide Unloading Spotters Hut was verified during the site inspections as containing the following: Full Face Mask, Cardiopulmonary resuscitation (CPR) Pro Mask, Canisters, PVC overalls, gum boots, rubber gloves, Albac Rescue mat, Emergency Medical Kit, Diphoterine.

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TGM inspects its first aid equipment regularly to ensure that it is available when needed, and materials such as cyanide antidotes are stored and/or tested as directed by their manufacturer and replaced on a schedule to ensure that they will be effective when needed. The contents of the Blue Boxes (face masks and gas canisters) and Green Boxes (OxySoks, face masks and gas canisters) are checked as part of the monthly safety inspections. OxySoks are tested during biannual medical checks undertaken and labels showed they were in date. The Site Nurse carries out weekly, fortnightly and monthly checks on the First Aid Equipment in the Medical Centre and of the Ambulance, including the Cyanide Kit. Oxygen therapy equipment has monthly checks and 6 monthly calibration. Completed inspections were verified for a number of dates throughout the audit period.

Two Cyanide Antidote Kits (CyanoKit) are onsite at all times and are stored at the First Aid Room and are checked on a monthly basis. First aid equipment housed by ERT has weekly operational readiness checks, and monthly on-board equipment and consumable checks carried out by the Emergency Services Officer (ESO). Records observed during the audit. The ESO and ERT members conduct daily, weekly and monthly checks on emergency equipment. TGM has developed specific written emergency response plans or procedures to respond to cyanide exposures.

TGM has developed the site wide Emergency Management Plan (EMP) that provides overarching guidance to emergency management. The EMP addresses the process to activate an emergency response and evacuation procedures. The response to cyanide emergencies is outlined in the EMP The Cyanide Exposure Treatment Procedure outlines the First Aid response for cyanide exposure and contains first aid measures including steps to take for suspected cyanide poisoning cases in a flow chart, with off-site emergency contact information. This includes the provision of oxygen with Oxysok or with Oxygen Cylinders, and the use of cyanide antidotes (ie hydroxycobalamine).

Step-by-step instructions for administering the Cyanokit are included with the kit, which is stored in the First Aid Room.

TGM has its own on-site capability to provide first aid or medical assistance to workers exposed to cyanide. The First Aid Room is a fully equipped two bed medical room and is located near the Processing Plant. There is a suitably qualified Site Nurse (on 24-hour call) to provide first aid or medical assistance to workers exposed to cyanide. The first aid room has a Crash Trolley, Defibrillator, two large medical oxygen cylinders, IV equipment, and ability to provide medications. The First Aid Room has a Cyanide Response Bag packed with all the equipment required for an initial cyanide response. As backup, TGM utilises a third-party medical service provider Occumed who hold the Poisons Permit for administering scheduled medications, and for expert medical advice as required. In addition, the RFDS is available to be contacted.

First Aid boxes are located in each work area, crib room, and all vehicles. Defibrillators and oxygen equipment are located around the site with signage in place to identify their location (cyanide unloading observers' hut, gold room, the control centre, First Aid Room and the

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ambulance).

TGM has developed procedures to transport workers exposed to cyanide to locally available qualified off-site medical facilities. TGM will rely on the RFDS to fly the patient to the Kalgoorlie Hospital. However, TGM has its own fully equipped ambulance onsite to transport patients to the onsite First Aid clinic or if necessary is capable of driving a patient to the nearest equipped hospital (ie Kalgoorlie Hospital). The Cyanide Exposure Treatment on Site Procedure outlines the procedure for ambulance transfer of workers exposed to cyanide including the requirement that the casualty should be accompanied by someone trained in CPR and able to continue the rescue. The cyanide antidote kit must be transported with the patient. The carrying of a monotox and a respirator for the safety of the medic is mandatory (and these items were observed to be present in the ambulance, and they are included in the weekly Ambulance checks).

TGM has informed local medical facilities of the potential need to treat patients for cyanide exposure and is confident that the medical facility has adequate, qualified staff, equipment, and expertise to respond to cyanide exposures. However due to the remoteness of the operation there is likely to be very limited response involvement by local medical facilities. Kalgoorlie Hospital is the nearest equipped hospital (330km from TGM) and has adequate, qualified staff, equipment and expertise to respond to cyanide exposures. RFDS also has the capability of transporting patients with a cyanide exposure. The most likely response would involve a patient being transported to Perth to be treated at a Tertiary Hospital. TGM also has a formal arrangement with Occumed (on-call Doctor) who hold a Poisons Permit for TGM, which can allow administering of Scheduled drugs, which includes for providing medical assistance over the telephone.

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# **Principle 7 | EMERGENCY RESPONSE**

Protect communities and the environment through the development of emergency response strategies and capabilities.

Name of Mine

Standard of Practi	ce /.1		
Prepare detailed emerg	gency respo	onse plans for potential cyan	ide releases.
	☑ in fu	ull compliance with	
The operation is	☐ in su	ubstantial compliance with	Standard of Practice 7.1
	$\square$ not	in compliance with	
Summarize the basis for	this Finding	g/Deficiencies Identified:	
TGM is in FULL COMPLIA		Standard of Practice 7.1: Pre le releases.	epare detailed emergency
cyanide and cyanide exp provides over-arching g preparedness, emergen and resources. The resp supported by additional Response Procedure, the Response to a Cyanide I Emergency Response Pr relating to the Tailings S	posure incidence to acy responsionse to cyall procedure e Cyanide Incident, and rocedure postorage Facilitations	dents. The site wide Emerge emergency management arse, recovery and review, and anide emergencies is outlinees such as the ERT Procedure Exposure Treatment Procedud ERT Action Sheets. The Ta	emergency management tools and in the EMP and is further less Manual, the Cyanide Spill leure, and the Immediate willings Storage Facility lergency response specifically Australia (AGAA) Crisis
appropriate for its site sprelated scenarios include facilities; Transportation Cyanide releases during and tank ruptures; Over	pecific envine: Catastronaccidents of unloading	ophic release of hydrogen cy occurring on site or in close	rcumstances. Potential Cyanide ranide from storage or process proximity to the operation; res and explosions; Pipe, valve Power outages and pump
route(s), physical and ch	nemical forn	m of the cyanide, method of	as considered transportation transport the condition of the e transported for delivery to site
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is under the control and responsibility of the cyanide Producer (AGR) and are responsible for emergency response in the case of an accident or release when on route; and have developed detailed emergency response plans in their Transport Management Plan for Sodium Cyanide Product. AGR, through CSBP's emergency response team provides offsite support in the event of an incident involving its sodium cyanide product. Qube Bulk has a detailed route plan. The CSBP Vehicle Operators Handbook for Sodium Cyanide outlines the vehicle operators' action in an emergency and the Emergency Response procedures, and the CSBP Transport Management Plan for Sodium Cyanide Product provides information on the physical and chemical form of the cyanide, method of transport, condition of road and railway and the design of the transport vehicle. A spill occurring close enough to the site for sending the ERT to respond would follow the "ERT Action Sheet 27 Environmental Recovery".

The TGM emergency response plans describe specific response actions (as appropriate for the anticipated emergency situations). Clearing site personnel from the area of exposure is addressed in the EMP which describes the Evacuation Procedure, including the use of muster points. The Initial Response Plans address evacuation, communication and initial response requirements relevant to the specific areas.

The use of cyanide antidotes and first aid measures for cyanide exposure are addressed in the Cyanide Exposure Treatment Procedure which outlines the First Aid response for cyanide exposure including the use of cyanide antidotes (which can only be administered with authorisation from qualified medics.

Control of releases at their source, and containment, assessment and mitigation of releases are addressed in the TGM emergency response plans. The Immediate Response - Cyanide Incident scenarios specifically address controlling releases at their source by instructing the Control Room to remotely close valves or stop pumps. The Cyanide Spill Response Procedure has suggested containment strategies (ie placement of soil or absorbent material around the spill, constructing earthen/soil bunds with shovels and loaders) and addresses mitigation of cyanide releases (ie Neutralisation of contaminated soil, and treatment and/or disposal). The environment department is identified as needing to be contacted for assessment to minimise any potential damage to the environment.

Future prevention of releases are addressed by raising all emergency response events as an emergency incident. TGM Incident Management Guide includes implementation of actions to prevent future releases.

The TGM emergency response plans do not address potentially affected communities. Due to the remoteness of the site, there are no potentially affected communities that need to be considered in the EMP response actions.

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#### **Standard of Practice 7.2**

Involve site personnel and stakeholders in the planning process.

	lacktriangledown in full compliance with	
The operation is	$\hfill\Box$ in substantial compliance with	Standard of Practice 7.2
	$\square$ not in compliance with	
Summarize the basis for t	his Finding/Deficiencies Identified:	

TGM is in FULL COMPLIANCE with Standard of Practice 7.2: Involve site personnel and stakeholders in the planning process.

TGM involves the workforce in the cyanide emergency response planning process in a number of other ways including through weekly area safety (toolbox) meetings, daily pre-start meetings which discuss safety and environment, monthly site governance meetings, plant inductions; training in core procedures including cyanide hazard awareness and participation in drill and evacuation exercises, including through the debrief sessions following the mock drills.

The nearest external community is Laverton township which is over 200 km away and it is considered that is too far away to be affected by an on-site cyanide emergency.

TGM has identified external entities having emergency response roles, however due to the remoteness of the operation there is likely to be very limited response involvement and therefore those entities have limited involvement in the emergency response planning process. Outside responders that are the closest available mutual aid support for TGM is Carosue Dam (6hrs away), Flying Doctor (4hrs response time) and Kalgoorlie emergency response (330km TGM). this remoteness requires a high-level participation and response capability by ERT.

TGM engage in consultation or communication with stakeholders to keep the Emergency Response Plan current. They are involved with the planning process to the extent that they have agreed that they can provide additional resources (equipment and personnel) in the event of an emergency.

TGM has formal arrangements with Occumed (on-call Doctor) for treating patients who have been exposed to cyanide. TGM also has Emergency Response mutual aid agreements with Northern Star Resources (including Carosue Dam Mine and Kalgoorlie Consolidated Gold Mine) and Vimy Resources (Mulga Rock), and Sunrise Dam Gold Mine. TGM has a Memorandum of Understanding (MOU) with the Department of Fire and Emergency Services (DFES) to provide mutual support in planning and responding to emergency incidents. Upon the response of any DFES resources to any of TGM land or premises, the ERT and DFES personnel shall operate under the incident management structure agreed upon and practiced between both TGM.

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TGM is a part of the Goldfields Esperance District Emergency Management Committee (DEMC) which includes Western Australian Police, and DFES. The DEMC is the forum used to communicate emergency planning, resourcing, contact details, any incidents that have occurred and receives feedback from external stakeholders.

Mock drills are used to assess emergency response preparedness on site. After each Mock Emergency Drill a debrief session is run, feedback on how the exercise went has been used to improve and update procedures.

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#### **Standard of Practice 7.3**

Designate appropriate personnel and commit necessary equipment and resources for emergency response.

	☑ in full compliance with	
The operation is	$\hfill\Box$ in substantial compliance with	Standard of Practice 7.3
	$\square$ not in compliance with	
Summarize the basis for t	his Finding/Deficiencies Identified:	

TGM is in FULL COMPLIANCE with Standard of Practice 7.3: Designate appropriate personnel and commit necessary equipment and resources for emergency response.

The TGM emergency response plan designates primary and alternative emergency response coordinators who have explicit authority to commit the resources necessary to implement the plans; identifies emergency response teams, requires appropriate training for emergency responders, includes call-out procedures and references to 24-hour contact information for the coordinators and response team members; specifies the duties and responsibilities of the coordinators and team members; lists emergency response equipment, including personal protection gear available on site; includes procedures to inspect emergency response equipment, and describes the role of outside responders, medical facilities and communities in the emergency response procedures, in relation to cyanide elements of the plans.

The EMP designates the responsibilities for each member of the Emergency Response Management Team, outlining explicit authority to implement the plan using the necessary resources. The EMP outlines that the Incident Controller has overall responsibility for the management of the Incident Management Team (IMT) and the IMT Deputy is responsible for assisting the Incident Controller. Duty Cards detail the activities that shall be undertaken by individual personnel who have a role in an emergency.

The EMP outlines the Emergency Response Team (ERT) requirements. The ERT Management Plan is referenced and that outlines the required responders to make up the Rescue Teams (at least two personnel for Immediate Response and four others including the Team Leader). The ESO shall review the roster each week to ascertain that there is a minimum of six (6) trained ERT members on site at all times.

The EMP and ERT Management Plan outline the Emergency Response Team (ERT) training requirements. ERT members shall achieve and maintain certificated competency in Cert11 Emergency Medical Response and Cert 111 Mine Rescue and will maintain these qualifications through maintenance training and maintaining their own maintenance training logbooks. The ERT Training Calendar shows the weekly training schedule for ERT members. Training is run

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weekly, four times a month to capture all crews. ERT members participate in annual mock drills.

The EMP indicates that the ESO is responsible for responding to the Emergency On-call Mobile Phone and arrange a muster of the ERT to group and deploy to the scene.

An ERT on-call roster is maintained and updated weekly by the ESO to ensure adequate coverage for site operations. The Emergency Contact List is kept up-to-date by the Safety Superintendent. A weekly roster showing which ERT members are on-site is generated for the coming week by the ESO, and this shows the competencies of each member on the roster.

Duty Cards for all involved in the emergency response, including the Incident Control Team, specify the duties and responsibilities for each role in an incident. The ERT Procedures Manual outlines the responsibilities and procedures of each team member in responding to incidents.

The EMP lists the emergency response equipment, including the ERT fire truck, the ESO truck rapid response, the Airport fire truck, Hazardous Materials (HAZMAT) incident trailer, Ambulance. The required personal protection gear required for responding to a cyanide incident are clearly listed in the Immediate Response Cyanide Incident, and in the ERT Action Sheets, and these items are all available onsite or in the emergency vehicles.

The EMP includes a table listing all emergency equipment, and the schedule of routine daily/ weekly/ monthly checks and maintenance; and includes who is accountable for carrying them out. The Ambulance and Fire Tender is required to have daily pre-start checks, weekly on-board equipment and consumable checks and restock, and a monthly servicing schedule.

TGM has identified external entities having emergency response roles, however due to the remoteness of the operation there is likely to be very limited response involvement from external responders, and therefore there is limited detail of the role they may play in the emergency procedures. TGM has a MOU with the Department of Fire and Emergency Services (DFES) to provide mutual support in planning and responding to emergency incidents. TGM has formal arrangements with Occumed (on-call Doctor) for providing medical advice. Mutual Aid Agreements have been made with other mine emergency response teams (ie Northern Star Resources (including Carosue Dam Mine and Kalgoorlie Consolidated Gold Mine) and Vimy Resources (Mulga Rock), these agreements state clearly the extent to which mutual aid may be offered, and the role that would be played.

TGM has confirmed that outside entities included in the Emergency Management Plan are aware of their involvement however due to the remoteness of the operation there is likely to be very limited response involvement and therefore those entities have limited involvement in mock drills.

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#### **Standard of Practice 7.4**

Develop procedures for internal and external emergency notification and reporting.

	☑ in full compliance with	
The operation is	$\hfill\Box$ in substantial compliance with	Standard of Practice 7.4
	$\square$ not in compliance with	
Summarize the basis for this	s Finding/Deficiencies Identified:	

TGM is in FULL COMPLIANCE with Standard of Practice 7.4: Develop procedures for internal and external emergency notification and reporting.

The TGM Emergency Management Plan includes procedures and contact information for notifying management, regulatory agencies, outside response providers and medical facilities of the cyanide emergency. The EMP has a matrix to trigger notification to management, including the Corporate Crisis Management Team in Perth. The Duty Cards outline the roles and actions to be carried out. The Incident Controller interacts with appropriate government officials, the media, the community and corporate personnel.

Cyanide Exposure Treatment Procedure includes steps to take for suspected cyanide poisoning cases in a flow chart, with off-site emergency contact information. The Site Nurse has established protocols for contacting medical aid offsite, including the Site Doctors and RFDS.

The Emergency Contact List includes the contact information for External response providers (ie DFES, RFDS, Site Doctors, Kalgoorlie Hospital), mutual aid partners (other mine sites) and regulatory agencies. The list is kept up-to-date by the Safety Superintendent. A hardcopy of the list is available in the Incident Command Centre (ICC).

TGM emergency response plans include procedures for communication with the media. The EMP states that the Registered Manager would handle all media contact onsite prior to the availability of the Crisis Management Team (in Perth). There is a Duty Card for handling enquiries from the Media, government agencies and visitors.

TGM emergency response plans do not include procedures and contact information for notifying potentially affected communities of the cyanide related incident and any necessary response measures, as TGM's location is very remote from any communities, so incidents occurring on-site would generally not affect or require immediate communications with those communities. Nevertheless, any communications with those communities would be handled by the Manager Community (AGAA Perth Corporate Office).

The Emergency Management Plan and Cyanide Spill Response Procedure includes the requirements for notifying ICMI of any significant cyanide incidents. No significant cyanide

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incidents	, as defined	in ICMI's I	Definitions	and Ac	ronyms	docume	nt have	occurred	in the	audit
period.										

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#### **Standard of Practice 7.5**

Incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

	☑ in full compliance with	
The operation is	$\hfill \square$ in substantial compliance with	Standard of Practice 7.5
	$\square$ not in compliance with	
Summarize the basis for t	his Finding/Deficiencies Identified:	

TGM is in FULL COMPLIANCE with Standard of Practice 7.5: Incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

The TGM emergency response plans describe specific remediation measures as appropriate for the likely cyanide release scenarios, including recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media, and management of spill clean-up debris. TGM Cyanide Spill Response Procedure and the ERT Action Sheets describe the specific remediation measures. Recovered cyanide containing liquid solutions can be transported or directed away from the spill site and treated in properly controlled conditions (e.g. returning it to the process plant via a sump pump). Otherwise, solutions are to be neutralised insitu and removed for treatment. Recovery of solids containing cyanide is by excavation and removal to the TSF. The method of use, and location of the neutralisation agent (Ferrous Sulphate) is described and includes the requirement to use full protective clothing including respiratory protection. The process of decontamination of soils is described, as is the process of decontaminating any equipment used for a spill, including PPE. Disposal of spill clean-up debris is addressed, the contaminated soil will be excavated and disposed of by either returning it to process, or directly to the tailings storage facility.

There are no drinking water supplies that could come into contact with cyanide at the site and provision of alternative water supplies is therefore not applicable.

The plans prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water or that has the potential to reach surface water. The only neutralisation agent that is allowed at TGM is Ferrous Sulfate. TGM has no discharges to surface water and no surface water bodies in the immediate vicinity of the operation, but there are some stormwater diversion channels and a creek crossing on the access road. The Cyanide Spill Response Procedure states that "In a situation where cyanide has entered one of the storm water diversion channels (or there is a possibility that it will enter one of these channels) do not use ferrous sulphate or any other reagent".

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The TGM emergency response plans address the potential need for environmental monitoring to identify the extent and effects of a cyanide release, and include sampling methodologies, parameters and, where practical, possible sampling locations. The Cyanide Spill Response Procedure outlines the steps for taking a soil sample of the soil after the contaminated soil has been removed and instructs that additional decontamination would be required if the WAD cyanide was above 0.5ppm. It also instructs that a water sample should be taken from the monitoring bores within the vicinity of the spill and if the WAD cyanide was above 0.5ppm a remediation plan would be required. The number of samples to be taken would be based on the location and nature of the spill as determined through consultation with the environment department.

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## **Standard of Practice 7.6**

Name of Mine

Periodically evaluate response procedures and capabilities and revise them as needed.

Periodically evaluate res	ponse procedures and capabilities	and revise them as needed.
The operation is	<ul><li>☑ in full compliance with</li><li>☐ in substantial compliance wit</li><li>☐ not in compliance with</li></ul>	Standard of Practice 7.6
Summarize the basis for t	this Finding/Deficiencies Identified:	
	NCE with Standard of Practice 7.6 ies and revise them as needed.	: Periodically evaluate response
TGM reviews and evaluat basis, and when required		lan (EMP) for adequacy on an annual
the Emergency Services (	ducts mock drills involving cyanide Officer, the Emergency Response T spond to cyanide emergencies. Ex	
conducted in the audit pe	ercises) involving cyanide exposure eriod, these included administering a casualty. External personnel were rios been tested.	g First Aid, manual isolation of a
	lace to evaluate and revise the emo	ergency response plans as required, ated emergency.
-	gency has yet occurred and as suc lated emergency in the audit perio	h no changes to the EMP were made od.
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# **Principle 8 | TRAINING**

Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.

### **Standard of Practice 8.1**

Train workers to understan	d the hazards associated with cyanide	use.
	☑ in full compliance with	
The operation is	$\square$ in substantial compliance with	Standard of Practice 8.1
	$\square$ not in compliance with	
Summarize the basis for this	s Finding/Deficiencies Identified:	
TGM is in FULL COMPLIAN hazards associated with cya	CE with Standard of Practice 8.1: Trair anide use.	n workers to understand the
All personnel who may enchazard recognition.	ounter cyanide in cyanide hazard reco	ognition are trained in cyanide
includes the areas where cy exposure treatment and the and contractors who will be	ntractors are required to do the Gene vanide is used, the symptoms of cyanic e emergency contact number and rad working in the processing plant have ore details on which areas contain cyant.	de poisoning, cyanide io channel. TGM employees to do the Processing Plant
Cyanide Awareness training properties of cyanide, safe required PPE, cyanide first a	actors who will be working in the proc g. This training material is supplied by use of cyanide, dangers of cyanide, sy aid, methods for neutralising cyanide, he workers in the Processing Departm e Processing Induction.	AGR. It covers the chemical mptoms of cyanide poisoning what to do when there is a
refresher training is carried areas. All staff who required exception of staff who were	n refresher training is periodically condout on an annual basis at TGM for all d Cyanide Awareness refresher training on extended leave). The General Site sher training every five years.	personnel working in cyanide g had completed it (with
Cyanide training records ar	re retained. Records of all cyanide rela	ted training including
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inductions, and cyanide awareness and training are maintained and managed by the Training Coordinator. TGM uses INX InTuition software programme to electronically store training records.

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#### **Standard of Practice 8.2**

Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

	☑ in full compliance with	
The operation is	$\square$ in substantial compliance with	Standard of Practice 8.2
	$\square$ not in compliance with	
Summarize the basis for t	his Finding/Deficiencies Identified:	

TGM is in FULL COMPLIANCE with Standard of Practice 8.2: Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community, and the environment.

TGM trains workers to perform their normal production tasks, including unloading, mixing, production and maintenance, with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases. The following training is required to ensure personnel are appropriately qualified: Area Specific Operating Manuals (contain all relevant information about the activities for that specific area, the associated hazards and necessary controls); Cyanide delivery; Cleaning elution column basket filters; Flush Cyanide Line to the Elution Area; Flush Cyanide Line to the CIL tanks; and Cleaning CIL Interstage Screens; Immediate Response to a Cyanide Incident Procedure; Cyanide First Aid. New employees are initially assigned a "buddy" so that they can learn alongside an experienced operator. Online training programs are also completed to cover the theory components. The trainee will not be authorised to carry out any Work Instructions unsupervised until they have been deemed competent (by the supervisor).

Training elements necessary for each job involving cyanide management are identified in training material used at TGM. All cyanide related procedures and work instructions identify the purpose of the procedure, PPE requirements, hazards associated with the task, steps involved in the task and other requirements of the procedure.

At TGM task training related to cyanide management activities provided by an appropriately qualified person. Competency-based training undertaken by new operators is conducted by Shift Supervisors. Other formal training elements are conducted by the Training Coordinator who is qualified as a trainer/assessor. Trainers have certification for training skills. Specialist training for ER team is provided by both experienced site personnel and expert third party trainers.

TGM trains employees prior to working with cyanide. TGM ensures that employees undergo the appropriate training for a specific work area prior to undertaking that work without coaching.

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Until the employee is found competent for specific work tasks, they must be supervised by a competent technician while conducting the work. After training and reviewing the manuals and procedures, the processing personnel will have to complete a theoretical assessment and be deemed competent to perform specific work tasks.

TGM provides refresher training on cyanide management to ensure that employees continue to perform their jobs in a safe and environmentally protective manner. All required competencies and compliances for a specific workgroup or role is listed in InTuition. The refresher training time period is identified for each competency in InTuition. An operator must be reassessed: at the request of a Manager or Supervisor; if an individual has not operated the equipment for a period of over 12 months; if operator techniques are modified; or, if new equipment models are introduced. "Cyanide First Aid Refresher" is re-done every 6 months. Advanced Resuscitation is refreshed every two years, First Aid Certificate is done every 3 years.

TGM evaluates the effectiveness of cyanide training by testing, task observation and other means. Process technicians are required to undergo a theoretical and practical assessment on the manuals and procedures before they can perform the tasks without supervision.

Records are retained throughout an individual's employment to document the training they receive including the names of the employee and the trainer, the date of training, the topics covered, and if the employee demonstrated an understanding of the training materials. INX InTuition is used to document and store all TGM training records. The name, date, course completed, and trainer is recorded. All training records are maintained and managed by the Training Coordinator. All training documentation is uploaded to InTuition (including signed forms, copies of certificates, completed assessments). Competencies are set up for each role which lists all core training, and the refresher training time period. New training records were observed to be uploaded to the programme.

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#### **Standard of Practice 8.3**

Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

The operation is	☑ in full compliance with	Standard of Practice 8.3
	$\square$ in substantial compliance with	
	$\square$ not in compliance with	
Summarize the basis for this Finding/Deficiencies Identified:		

TGM is in FULL COMPLIANCE with Standard of Practice 8.3: Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

Cyanide unloading, production and maintenance personnel at TGM are trained in the procedures to be followed if cyanide is released. All process technicians are required to undergo training for: "Immediate Response to a Cyanide Incident" (addresses sodium cyanide solution spills inside and outside of spill containment areas and includes the administering of oxygen, removal of clothing, and washing of eyes and/or skin); and "Cyanide First Aid Refresher" Training (the administration of oxygen as the first response to cyanide exposure); "Cyanide Equipment and PPE Decontamination" (addresses safety guidelines for decontaminating any equipment or PPE exposed to cyanide).

All cyanide unloading personnel are required to have completed Advanced Resuscitation, and First Aid Certification in addition to the other procedures required for all processing personnel.

At TGM, Emergency Response Coordinators and members of the ERT are trained in the procedures included in the Emergency Response Plan regarding cyanide, including the use of necessary response equipment. To attend an Emergency Response incident in the Processing area, the ERT members must have completed the HAZMAT and Breathing Apparatus competencies. They should also have received cyanide awareness training and Processing Induction. Training records show which team members are trained in each module and training records show that 80% of the team have completed cyanide awareness and processing induction.

The Emergency Response Team members undergo weekly training sessions which includes regular use of Oxygen Resuscitators and some cyanide related scenarios. Mock Drills are undertaken for scenarios which cover both worker exposures and environmental releases.

Where deemed necessary, TGM has made off-site Emergency Responders, such as community members, local responders, and medical providers, familiar with those elements of the Emergency Response Plan related to cyanide. However due to the remoteness of the operation there is likely to be very limited response involvement and therefore those entities have limited

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involvement in the emergency response planning process. TGM has a Memorandum of Understanding (MOU) with the Department of Fire and Emergency Services (DFES) to provide mutual support in planning and responding to emergency incidents. TGM has formal arrangements with Occumed (on-call Doctor) for providing medical advice. TGM has Emergency Response Mutual Aid Agreements with Northern Star Resources (including Carosue Dam Mine and Kalgoorlie Consolidated Gold Mine) and Vimy Resources (Mulga Rock), and Sunrise Dam Gold Mine.

TGM conducts regular refresher training for response to cyanide exposures and releases. "Immediate Response to a Cyanide Incident Training" is required to be completed annually. "Cyanide First Aid Refresher" training is carried out annually.

Records are retained documenting the cyanide emergency response training, including the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials. INX InTuition is used to document and store all TGM training records (of permanent employees). All training records are maintained and managed by the Training Coordinator.

Emergency Response Team training records are managed by the ERT Coordinator and hard copies are in the filing cabinet in the Emergency Response training room. Training records include the names of the employee and trainer, date of training, topics covered, and the assessment completed to confirm understanding of training content. Dates of all training, including on-site training is recorded in the ERT Skills Matrix (Excel Spreadsheet).

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# **Principle 9 | DIALOGUE AND DISCLOSURE**

Engage in public consultation and disclosure.

### **Standard of Practice 9.1**

Name of Mine

Promote dialogue with sta identified concerns.	akeholders regarding cyanide manage	ement and responsibly address
	☑ in full compliance with	
The operation is	$\square$ in substantial compliance with	Standard of Practice 9.1
	$\square$ not in compliance with	
Summarize the basis for th	is Finding/Deficiencies Identified:	
	NCE with Standard of Practice 9.1: Pro anide management and responsibly a	_
TGM provides stakeholder with them regarding their	rs with information on its cyanide man concerns.	agement practices and engage
300km of the site. The nea	ote from any communities. No reside rest pastoral station is 150km away, a s such, TGM has limited stakeholders	nd it is 220km from the nearest
stakeholder interactions. T	gagement Management Plan that det here is an email address for commun Enquiries Page on Tropicana JV Web	ity enquiries that is listed on the
facilitates family visitation of opportunity to see the TGI about cyanide manageme last year. Students from Ka	neir families are considered to be key days where family members of persor M operations and interact with the pront is shared at these site visits. There walgoorlie (Year 11 and 12) have also violation. Cyanide management is discussed in	nnel working onsite have the ocessing personnel. Information were three of these events held sited site to get an idea of
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### Standard of Practice 9.2

Make appropriate operational and environmental information regarding cyanide available to stakeholders.

	☑ in full compliance with	
The operation is	$\hfill \square$ in substantial compliance with	Standard of Practice 9.2
	$\square$ not in compliance with	
Summarize the basis for this Finding/Deficiencies Identified:		

TGM is in FULL COMPLIANCE with Standard of Practice 9.2: Make appropriate operational and environmental information regarding cyanide available to stakeholders.

TGM has developed written descriptions of how their activities are conducted and how cyanide is managed. A summarised version of these is available to communities and other stakeholders.

TGM has produced a Cyanide Information Sheet outlining the use of cyanide at the site and TGM's participation in the International Cyanide Management Code. TGM has made the information sheet available for stakeholders.

A summary of the cyanide management proposed for the TSF was included in the Public Environmental Review Document available on the Tropicana JV website Sustainability > Document Library > EIA Documents / Approvals (Sustainability | Tropicana Joint Venture (tropicanajv.com.au)).

There is not a significant percentage of the local population (or identified stakeholders) that is illiterate; the spoken and written language is English. The cyanide management information sheet is written in English. However, most stakeholder engagement is generally delivered verbally by phone call and site visits.

TGM makes information publicly available on confirmed cyanide release or exposure incidents if they occur. There have been no cyanide release or exposure incidents in the reporting period.

The following are the ways that a cyanide release would be reported in a publicly available way if it occurred:

Annual Environmental Compliance Assessment Reports: These reports list any non-compliances with the Ministerial Conditions (government approval). Any cyanide releases on or off the mine site, or that exceed applicable limits would be included in this report. The complete report for every year of operation is available on the Tropicana JV website under Sustainability > Performance > Annual Environmental Compliance Reports (Sustainability | Tropicana Joint Venture (tropicanajv.com.au)).

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 AngloGold Ashanti Sustainability Report and Sustainability Data Workbook - an event summary of reportable environmental incidents is included in the Water tab of the Data Workbook. The summary includes the date and site, type of incident and severity, and a summary of the actual incident and response.

A cyanide exposure resulting in hospitalisation or fatality would be reported publicly by way of a media release.

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