



Iduapriem Gold Mine - International Cyanide Management Code Recertification Audit

Summary Audit Report

Anglogold Ashanti Iduapriem Limited

Prepared by:

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Basis of Report

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| Acronym / abbreviation | Description |
|------------------------|---|
| AAIL | Anglogold Ashanti Iduapriem Limited |
| CIL | Carbon-in-Leach |
| CN | Cyanide |
| ERT | Emergency Response Team |
| HCN | Hydrogen Cyanide |
| HDPE | High Density Polyethylene |
| Hebei | Hebei Chengxin Co. Ltd |
| HOD | Head of Department |
| HR | Human Resources |
| HSE | Health, Safety and Environment |
| ICMC | International Cyanide Management Code |
| ICMI | International Cyanide Management Institute |
| Iduapriem | Iduapriem Gold Mine |
| IFC | International Finance Corporation |
| ILR | Intensive Leach Reactor |
| LOM | Life of Mine |
| OEM | Original Equipment Manufacturer |
| PMS | Planned Maintenance System |
| PPE | Personal Protective Equipment |
| ppm | Parts Per Million |
| PTO | Planned Task Observation |
| ROM | Run-of-Mine |
| SAG | Semi-Autogenous Grinding |
| SCADA | Supervisory Control and Data Acquisition |
| SDS | Safety Data Sheets |
| SLR | SLR Consulting (Ghana) (Pty) Ltd |
| SOP | Standard Operating Procedure |
| The Code | The International Cyanide Management Code for the Manufacture, Transport, And Use of Cyanide in the Production of Gold and Silver |
| The Plant | Iduapriem Gold Plant |
| The Protocol | The Mining Operations Verification Protocol |
| TSF | Tailings Storage Facility |
| UNEP | United Nations Environmental Program |
| WAD | Weak Acid Dissociable |



1.0 Summary Audit Report for Gold Mining Operations

| | |
|--|--|
| Name of Cyanide User Facility: | Iduapriem Gold Plant |
| Name of Cyanide User Facility Owner: | Anglogold Ashanti Iduapriem Limited |
| Name of Cyanide User Facility Operator: | Anglogold Ashant Iduapriem Limited |
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2.0 Background

2.1 Location detail and description of operation:

AngloGold Ashanti Iduapriem Limited (AAIL) Gold Mine is located in the Western Region of Ghana, about 17 km southwest of Tarkwa.

The original Iduapriem Gold Mine started operating in June 1992 and was designed to treat approximately 2.4 million tonnes per annum (mtpa). The plant has undergone several expansions carried out since original commissioning. The most recent expansion works were completed and commissioned in November 2017, where the process was changed to a fully operational CIL (carbon-in-leach) process. The process plant now has a capacity to treat approximately 5.2-5.4 Mtpa, at a recovery of 95.85-96%, to produce an average of 230,000 - 240,000 ounces of gold per annum. The operation utilizes two SAG Mills and two Ball Mills which run in two parallel closed circuits.

2.2 Crushing Plant

Ore mined from "Blocks 7 and 8", and "Block 5" is hauled by means of 777 and 785 dump trucks to the crushing plant. Conventionally, the dump trucks do direct tipping into a 400 m³ Run-of-mine (ROM) bin that feeds a MK11 54-75 primary crusher (gyratory crusher) or is stockpiled (ROM stockpile) and fed to the ROM bin later when not hauling from the pit. The crushed product is conveyed to a primary screen with a double deck, top deck screen size 100 mm x 100 mm and lower deck screen size 50 mm x 50 mm to improve mill throughput with intensive high powder factor blast material. The oversize material from the screen is conveyed to a secondary stockpile of 30,000 tons capacity. The undersize product joins a 5.1 km conveyor which sends the material to the CIL upgrade stockpile. With the help of

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apron feeders, feed is sent from the secondary stockpile to two GP550 secondary gyratory crushers. The secondary crushers operate in closed circuit with two sets of secondary screens. Screen sizes are 65 x 40 mm. The oversize material goes back to the secondary crusher for further size reduction. The undersize joins the 5.1 km conveyor to the 8,800 tonne CIL upgrade stockpile. A pebble crushing plant (Scats Crusher) is mounted close to the 9000 tonne capacity CIL stockpile to treat scats generated from the mills. Construction of a tertiary crusher to further reduce the ore size to 16-20mm to the upgrade is in progress.

2.3 Milling

Iduapriem is running a CIL system with two conventional SABC (Semi-Autogenous Ball Mill Crusher) circuits and pre-leach thickening. Each circuit is in a closed circuit with one XD48 Knelson concentrator. Circuit # 1 has two dedicated thickeners (16 metre diameter supaflo) for pre-leach thickening, whilst circuit # 2 has one 24 metre diameter thickener also for pre-leach thickening.

A dual reclaim apron feeder, conveyor tunnel system is used to deliver the crushed product to two SAG Mills operating in parallel. The SAG Mill #1, (5.2 m Ø x 6.0 m EGL, 2500 kW motor) and Ball Mill #1, discharge into a common hopper. Slurry from the hopper is pumped to cyclone cluster # 1. In the same way, the SAG Mill # 2 (5.55 m Ø x 7.3 m EGL, 3750 KW motor) and Ball Mill # 2, have a dedicated discharge hopper, pumps and cyclones (cyclone cluster # 2). The cyclone overflow from each cluster reports to respective trash screens and underflows to respective distributor boxes.

Distributor box # 1 for circuit # 1 has three outlets, with the largest flow to the ball mill for further size reduction. The second outlet bleeds a stream to the gravity circuit scalping screen, while the third outlet allows SAG # 1 to be run in closed-circuit when Ball Mill # 1 is down for planned maintenance. The same arrangement is replicated for circuit # 2. The Ball Mill # 1 is a 4.3 m Ø x 7.0 m EGL overflow mill, with 2250 kW motor and Ball Mill # 2 is a 4.26 m Ø x 7.32 m Hardinge with 2250 kW motor.

The cyclone overflow material is de-trashed using two 25-meter square Delkor Linear Screens. The de-trashed slurry, known as thickener feed material, then reports to their respective thickeners which operate in parallel to allow density of slurry to be raised from 28% solids to 52% solids before it reports to the Leach Circuit.

2.4 In-line Leach Reactor

A gravity circuit comprising two XD48 centrifugal (Knelson) concentrators and an In-line Leach Reactor (ILR – Series 1000) recovers free gold (gravity gold) by processing the dense particles from the cyclone underflow slurry. Each circuit has one Knelson concentrator and part of the cyclone underflow is bled to feed the Knelson concentrator.

The concentrator operates in batch mode. Once the pre-set cycle time has elapsed, the unit goes through a flush cycle time to discharge accumulated concentrates. The concentrates are flushed to the feed cone of the ILR for further treatment by intensive cyanidation through a batch-type In-line Leach Reactor (ILR-Series 1000), where the gold is dissolved and electrowon onto steel wool cathodes in a dedicated electrowinning cell. Gravity gold accounts for approximately 40-45% of gold produced from the Iduapriem gold treatment plant.

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2.5 Leach

There are eleven Carbon-in-Leach (CIL) tanks with the first tank serving as a pre-leach tank. The CIL method of metal recovery involves leaching and absorbing gold in solution with activated carbon at the same time. Cyanide concentration of approximately 180-250 ppm (set point depending on ore type) and an average dissolved oxygen level of about 24 ppm are maintained in leach tanks # 1 and # 2. Cyanide and oxygen levels drop down stream. Additional cyanide and oxygen points are located on leach tanks # 3 and # 4 to ensure leaching of the gold into solution is maximized. On average the leach contact time is between 14-18 hours and total gold recovery about 95.85- 96.0%.

Carbon is used in the adsorption tanks to recover the gold cyanide complex ions out of solution as the carbon moves in counter current direction to the flow of the slurry. Carbon is continuously moved from tank to tank via recessed impeller pumps accumulating higher gold values in the process. Carbon is then recovered from leach tank # 2 for elution. Carbon can also be recovered from leach tank # 3 when leach # 2 is isolated or taken out of circuit for any reason.

2.6 Desorption

The Anglo-American Research Laboratory (AARL) method is employed to get the adsorbed gold on the carbon back into solution form using about 3-5% caustic solution. The gold is then electrowon onto steel wool cathodes in an electrowinning cell.

The loaded carbon is recovered from leach tank # 2 into the acid wash column. This is then acid washed using 3% strength hydrochloric acid followed by water rinsing. The rinsed carbon is then transferred to the elution column where a caustic solution of 3-5% is circulated through the elution column via the heat exchangers until an elution temperature between 110°C – 120°C and an operating pressure of 300-400 kilo pascals (Kpa) is attained in the column.

The caustic solution is then directed into a pregnant electrolyte tank and water is used to wash the solubilised gold from the carbon into the pregnant electrolyte tank. The pregnant electrolyte is pumped through two electrowinning cells for gold deposition. Once or twice weekly the loaded steel wool cathodes are removed, calcined, and smelted into Doré bullion. The barren carbon is transferred to the adsorption circuit or to the carbon regeneration kiln where it is thermally reactivated at 650°C in a horizontal, diesel-fired kiln. The reactivated carbon is collected in a quench tank and hydraulically transferred into adsorption tank # 7 (last CIL tank) through a carbon sizing screen.

2.7 Tailings And Process Water

Phase 1A of the Tailings Storage Facility (TSF) was commissioned in November 2010. The tailings discharge is approximately 45-48% solids where it is allowed to settle out. The tailings discharge pipes are High Density Polyethylene (HDPE) lined steel pipes with a diameter of 450 mm and the decant return water pipes are 500 mm diameter HDPE. The decant water from the slurry is continuously pumped back to the process water concrete dam inside the plant, to minimize accumulation of water on the TSF, from where it is pumped to various sections inside the plant for reuse in the processing operation. Monitoring has

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shown the level of Weak Acid Dissociable (WAD) cyanide in the process water concrete dam is below 0.5 mg/l in conformance with ICMI standard.

Normally all water from the TSF will be returned to the plant for re-use. When the capacity of water to the plant exceeds the plant capacity of about 680 m³/hr, then the balance of the return water will be sent to the Waste Water Treatment Plant (WWTP) for treatment to the Ghanaian Environmental Protection Agency (EPA) water quality standard before being discharged into the environment or Block 4, disused pits used for water storage. Typically, a maximum of 1000 m³/hr of water can be pumped from the TSF using two pumps. The WWTP has a capacity of 450 m³/hr.

2.8 Cyanide Delivery

The cyanide arrives at the Orica Bag-to-Bulk facility, adjacent to the mine site, as a solid in briquette form. The Orica Bag-to-Bulk facility is fenced off, under lock and key, and public access is restricted. On request from the process plant, requirements for cyanide are scheduled, and batches of 20 tonnes of briquette cyanide are transferred from boxes into isotainers and transported to the process plant under security escort. At the plant, the 20 tonne batches of solid cyanide are sparged (dissolved) into a solution at the cyanide sparging facility. The cyanide solution is then pumped out of the isotainer into the mixing and dosing tanks before being used in the leach process. In accordance with the ICMI standard, the cyanide solution is dyed with Carmousine to give it a red colour to distinguish it from other solutions in the processing plant.

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SUMMARY AUDIT REPORT

Auditors Findings

Tarkwa Gold Plant is: in full compliance with **The International Cyanide Management Code**
 in substantial compliance with
 not in compliance with

Audit Company: SLR Consulting (Ghana) Ltd
Audit Team Leader: Ed Perry, Lead Auditor
Email: eperry@slrconsulting.com
Mine Technical Auditor: Delanyo Aheto-Tsegah

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COMPLIANCE STATEMENT

Iduapriem Gold Mine has experienced one cyanide incidents since the previous recertification audit. This was an uncontrolled release of supernatant water with free cyanide concentration of 8.89 ppm seeping through the BTSF western embankment and entering the environment on 17 Feb 2025. A full investigation was undertaken into the incident which did not significantly impact the environment or local communities. This was notified to the ICMI as per the relevant procedure.

NAME OF OTHER AUDITORS

Dela Aheto-Tsegah

DATES OF AUDIT

The Recertification Audit was undertaken from between 13 October 2025 and 16 October 2025.

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I attest that I meet the criteria for knowledge, experience, and conflict of interest for Code Verification Audit Team Leader, 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 Code Verification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification 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.

The “International Cyanide Management Code for The Manufacture, Transport, And Use of Cyanide In The Production Of Gold and Silver” (the Code) was developed by a multi-stakeholder Steering Committee under the guidance of the United Nations Environmental Program (UNEP) and the then, International Council on Metals and the Environment.

The Code is a voluntary industry programme for gold and silver mining companies, and companies involved with the production and transport of cyanide to gold and silver mining companies; it focuses exclusively on the safe management of cyanide. Companies that adopt the Code must have their operations, which manufacture cyanide, transport cyanide or use cyanide to recover gold and silver, audited by an independent third party to determine the status of the Code’s implementation. Those operations that meet the Code’s requirements can be certified and are able to use a unique trademark symbol, which identifies the company as a certified operation. Audit results are made public to inform stakeholders of the status of cyanide management practices at the certified operation.

The objective of the Code is to improve the management of cyanide used in gold and silver mining and assist in the protection of human health and the reduction of environmental impacts (refer to www.cyanidecode.org). The Code is managed by the International Cyanide Management Institute (ICMI).

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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: Purchase cyanide from certified manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 1.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 1.1; to purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

The cyanide purchased by the mine is manufactured at a facility certified as being in compliance with the Code

The cyanide arrives at the mine from the Orica Bag-to-Bulk facility, adjacent to the mine site. From the 1 January 2020 the cyanide has been supplied to the Orica Bag-to-Bulk Facility from the Orica manufacturing facility in Yarwun, Australia. This facility was initially certified in 28 November 2006 and most recently certified on 31 October 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.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 2.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 2.1 requiring 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.

The operation has chain of custody records or other documentation identifying all transporters and supply chains responsible for transporting cyanide from the producer to the operation.

After 1 January 2020 the cyanide was produced at the Orica manufacturing facility in Yarwun, Australia then transported to the port of Takoradi in Ghana, from where Stella Logistics transports it, still in the original shipping container, to the Orica Bag-to-Bulk facility adjacent to the mine. The facility decants the brickettes into a sparging tanker which is then transported, again by Stella Logistics Limited, to the sparging facility at the mine.

All identified transporters are individually certified in compliance under the Code or included in certified supply chains.

The Australian Supply Chain covers the transportation of solid cyanide from the manufacturing facility in Yarwun, Australia, by road and rail to the Ports of Brisbane, Gladstone, Alma and Melbourne. This was most recently certified on the 6 October 2025.

The Global Marine Supply Chain is a consolidation of all marine carriers and ports used by Orica to distribute their cyanide from Australia to their global customers. This was most recently recertified on 2 December 2024

Stellar Logistics was initially certified on 14 April 2015 and most recently recertified on 4 December 2024.

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Principle 3 – Handling and Storage

Protect Workers and the Environment During Handling and Storage.

Standard of practice 3.1: 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.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 3.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 3.1; design and construct unloading, and storage facilities consistent with sound accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.

The facility for unloading, storing and mixing cyanide including the cyanide mixing tank, cyanide dosing tank, piping and secondary containment structures have been designed and constructed in accordance with cyanide producers' guidelines, applicable jurisdictional rules or other sound and accepted engineering practices for these facilities.

The cyanide arrives at the Orica Bag-to-Bulk facility, adjacent to the mine site, as a solid in briquette form. On request from the Process Plant, requirements for cyanide are scheduled, and batches of 20 tonnes of cyanide briquettes are transferred from boxes into isotainers at the Bag-to-Bulk facility and transported to the Process Plant. At the Plant, the 20 tonne batches of solid cyanide are sparged (dissolved) into a solution at the cyanide sparging facility by filling the isotainer with a specified amount of water and waiting 2 hours for the briquettes to dissolve. The cyanide solution is then pumped out of the isotainer into the mixing and dosing tanks before being used in the leach process.

The cyanide sparging and storage facility and dosing lines to the leach section were designed by Orica, an ICMI certified cyanide producer, which also owns the cyanide Bag-to-Bulk facility. There have been no changes to the facility since the previous re-certification audit.

It was confirmed during the site audit that the cyanide unloading, mixing and storage facility is located away from people and surface waters as observed by the auditors during the site visit.

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The cyanide sparging facility is located inside the security fence of the Plant, and inside another locked fenced area. The plant has strict access control for the Plant and the sparging facility.

The sparging and unloading of the liquid cyanide is undertaken on a concrete surface that can minimise seepage to the subsurface and the unloading area is designed and constructed to contain, recover or allow remediation of any leakage from the isotainer system.

It was verified during the site audit that the cyanide sparge isotainer is parked on a bunded concrete parking bay. Any spills from this area drains by gravity into the concrete bund for the mixing and dosing tanks.

The bund is equipped with a sump and automated pump system to recover any spillage back to the leach tanks.

There are systems in place to prevent the overflowing of cyanide mixing and dosing tanks. These systems are tested and maintained on a routine basis. The tanks are equipped with level indicators. Interlocks in the mixing tank are in place to prevent the tank from running less than 7%.

The prefill set point is pre-set to give a target concentration of 30% w/w Sodium Cyanide (NaCN). The amount of water added raises the mixing tank level to 60% with an interlock to prevent this being exceeded. The addition of the sparging tanker raises this level to 71%. Adjustment of the quantity of water added is not available to the driver or Shift Supervisor. If for some reason, the amount of water added exceeds the pre-set overfilled level, the raw water valve is automatically closed.

Once the sparging process is complete the mixture is pumped to the dosing tank on an as required basis. There is an interlock to prevent the dosing tank from being overfilled. The SCADA, pumps, and interlocks for the tanks are part of the planned maintenance system (PMS).

The mixing and dosing tanks are adjacent to each other. They are constructed of mild steel and are located on a horizontal unit installed on a steel cradle bolted to concrete plinths and placed inside a concrete bund that provides a competent barrier to leakage and prevents seepage to subsurface. The bund was observed by the auditors to be in good condition during the site visit.

The following was confirmed during the site inspection that cyanide is stored:

- a) Under a roof, off the ground, or with other measures to minimise the potential for contact of solid cyanide with water. No solid cyanide is stored on site. Following the sparging and offloading activity the liquid cyanide is stored as a liquid in the mixing and dosing tanks, which are off the ground and prevent the cyanide from coming into contact with water.
- b) With adequate ventilation to prevent the build-up of Hydrogen Cyanide (HCN) gas. It was observed during the site audit that the two tanks (mixing and dosing tanks), which are adjacent to each other and interconnected are in an open air environment and both are equipped with ventilation pipes.

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- c) In a secure area where public access is prohibited, such as within the fenced boundary of the Plant. The liquid cyanide sparging and storage area is in a fenced and locked area within the Plant which is also fenced and located inside a security area where access is controlled 24 hours per day.

- d) Separately from incompatible materials, such as acids, strong oxidisers and explosives and apart from foods, animal feeds, and tobacco products with berms, bunds, walls or other appropriate barriers that will prevent mixing. The liquid cyanide is stored in two adjacent tanks that are separate from incompatible materials such as acids, strong oxidizers and explosives and apart from foods, animal feeds and tobacco products.

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Standard of practice 3.2: Operate unloading, storage and mixing facilities using inspections, preventative maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 3.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 3.2; operate unloading and storage using inspections, preventative maintenance, and contingency plans to prevent or contain releases and control and respond to worker exposures.

With respect to empty cyanide containers, procedures are in place and implemented for the following:

- Prevent empty cyanide containers from being used for any purpose other than holding cyanide. No solid cyanide is stored on site. The cyanide is stored as a liquid following the sparging and offloading activity in the mixing and dosing tanks. The cyanide container is the isotainer that brings the briquettes to site for the sparging, which is only used and reused for this purpose.
- Rinse empty cyanide drums, plastic bags and liners with water three times and add the rinse water to the cyanidation process or otherwise disposed of in an environmentally sound manner. The containers used are isotainers which are returned to the sparging facility for reuse.
- Burn or otherwise dispose of empty wooden crates in an environmentally sound manner. This is not applicable as isotainers are used for the transportation of the cyanide briquettes that are subsequently sparged.
- Clean any cyanide residue from the outside of cyanide containers that are returned to the vendor and securely close them for shipment. *Cyanide Sparging Procedure, IPCN-049, Rev 7, 1 May 2025* - Section 6.6.7 Sparge Operations – states that any spillage or drips of cyanide, including drips on the Sparge Isotainer must be hosed down prior to leaving the discharge bay. The hosed down liquid will then enter the tank bund by gravity from where it is pumped to the leach tanks. The auditors observed this activity that includes cleaning any spillage or drips of cyanide on the sparge isotainer prior to leaving the bay.

The operation has developed and implemented procedures to prevent exposures and releases during cyanide unloading and mixing activities. The procedures listed below were reviewed by the auditors.

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- a) Operation and maintenance of all hoses, valves and couplings for unloading liquid cyanide and mixing solid or liquid cyanide.

Cyanide Sparging Procedure, IPCN-049, Rev 7, 1 May 2025

Section 6.2.2 - Prefill the Dissolving Tank with Raw Water - states the required operation of valves, including specifically stating which valves should be open and which should be closed.

Section 6.2.5 - Connecting the Sparge Hoses to the Sparge Isotainer

Section 6.2.6 - Sparge Pump Selection.

Section 6.6.7 – Sparge Operations (hosing any spills or drips).

The Iduapriem operators have the responsibility of making the connections from the Iduapriem facility to the sparge isotainer and subsequent sparging process.

- b) Handling cyanide containers without rupturing or puncturing. This not applicable as the cyanide container used is an isotainer in which the cyanide briquettes are dissolved and the subsequent liquid is transferred to the mixing tank.
- c) Limiting the height of stacking of cyanide containers. This not applicable as the cyanide container used is an isotainer in which the cyanide briquettes are dissolved and the subsequent liquid is transferred to the mixing tank.
- d) Timely cleanup of any spills of cyanide during mixing and transfer of liquid cyanide from tanker trucks and isotainers. Section 6.6.7 Sparge Operations – states that any spillage or drips of cyanide, including drips on the Sparge Isotainer must be hosed down prior to leaving the discharge bay. The hosed down liquid will then enter the tank bund by gravity from where it is pumped to the leach tanks.
- e) Providing for safe unloading of liquid cyanide and manual mixing of solid cyanide by requiring appropriate personal protective equipment and having a second individual observe from a safe area, or observe remotely by video.

Cyanide Sparging Procedure, IPCN-049, Rev 7, 1 May 2025.

Section 5 – Personal Protective Equipment (PPE) Level - lists the required PPE to be used during Sparging activities, including personal gas monitor (HCN), respiratory canister, rubber boot, chemical suit, chemical gloves, face shield.

The procedure states “When work is conducted on or in any cyanide equipment or in a cyanide area, at least two fully trained (for cyanide) and competent persons are required for the task. One person will carry out the work, in full PPE as required, while the second person will remain outside of the hazard or work area. This second person, referred to as the “Buddy”, is also fully equipped with and has donned the required cyanide PPE and will observe the person always carrying out the work while that person is inside the hazard / work area. If the person carrying out the work is exposed to cyanide or cyanide reaction products. The “Buddy” will immediately respond to the emergency”.

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The auditors observed the cyanide sparging activity where the sparging personnel were in appropriate PPE equipment and that a Buddy was included who observed the people carrying out the work.

- f) Addition of colorant dye to solid cyanide prior to or at the point of mixing into solution and/or provisions for the addition of colorant dye to high-strength liquid cyanide prior to delivery at the mining operation.

Cyanide Sparging Procedure, IPCN-049, Rev 7, 1 May 2025

Section 6.2.3 Caustic and Carmosine Dye Addition - after prefill requires addition of dye to the sparge vessel through the caustic hopper. It was observed during the site visit that the cyanide solution being dosed to the leach is red. The auditors observed the cyanide liquid at the dosing point to have been dyed red.

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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 preventative maintenance procedures.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.1; to implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventative maintenance procedures.

The operation has developed written management and operating plans and procedures for cyanide facilities including unloading, mixing and storage facilities, process plants, and tailings impoundments. The operation does not have any heap leach, cyanide treatment, regeneration or disposal systems.

The operation has 42 Cyanide Procedures, which includes the following;

- *Procedure For Cyanide Spillage, Release Of HCN And Communication With Corporate Offices, IP-CN-012, Rev8, 1 May 2025*
- *Procedure for Cyanide Sparging, IPCN-049, Rev 8, 1 May 2025*
- *Procedure For Entry Into Confined Spaces, IP-CN-10, Rev 8, 1 May 2025*
- *Procedure for Buddy System, IP-CN-047, Rev 8, 1 May 2025*

The TSF procedures include the following:

Iduapriem Gold Mine Beposo Tailings Storage Facility Operations, Maintenance And Surveillance Manual. Report No: JW204/22/H374 – Rev 1, March 2023 prepared by Jones & Wagener. The operations manual covers TSF management aspects such as the following:

- Water management including monitoring of freeboard, phreatic levels, design floods seepage, pump station;
- Maintenance works for monitoring instrumentation, pumps, access roads, seepage collection sumps and emergency pond; and
- Roles and responsibilities of persons in charge.

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The operation's plans and procedures identify and account for the assumptions and parameters on which the facility design was based and applicable regulatory requirements as necessary to prevent or control cyanide releases and exposures consistent with applicable requirements.

The operation's plans or procedures include the following;

- *Procedure for Emptying Cyanide Spillage Bund, IP-CN-030, Rev 8, 1 May 2025* - if spillage is due to running water during mixing, it can be pumped to the leach tanks by the Reagent Operator after establishing that the pH in the leach exceeds 10.5.
- *Procedure for spiking cyanide IP-CN-015, IP-CN 015, 1 May 2025* states the pH of the tank intended for spiking must be confirmed to be above 10.5.
- The set point in Leach Tank 1 at the time of the audit was 200 ppm free cyanide. Changes in the set point are recorded in the Shiftly Notebook and communicated by the Metallurgical Superintendent to the Shift Metallurgist.
- *Procedure To Follow When High WAD Cyanide Levels Are Measured In The Residue Slurry, IP-CN-033, Rev 8, 1 May 2025* – this requires that the WAD cyanide must be kept below 50 ppm.

Iduapriem Gold mine Beposo Tailings Storage Facility Operations, maintenance and surveillance manual. Report No: JW204/22/H374 – Rev 1, March 2023 prepared by Jones & Wagener. The EPA instructs a minimum of 1.5 m freeboard, and the freeboard must never be less than this. It is required that the freeboard is recorded in the daily reports. The Minerals and Mining Regulations L.I. 2182 (June 2012) require that the TSF is constructed to contain a 1:100 year 24-hour rainfall, with a minimum 1.0 m freeboard i.e. the minimum requirement by the Ghanaian Regulations, whereas the design of the TSF requires a minimum freeboard of 1.5 m.

It was confirmed that the TSF has been designed to accommodate a 1:100 year 24 hour storm event (297 mm in 24 hours) and that the freeboard has been designed to be greater than 1.5 m. However, the TSF currently has significant excess capacity with an 11 m freeboard

The operation has 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, such as water management, inspections and preventive maintenance activities.

Water Management

HSE Procedure No: IDP/HSE/PRO/ERP/P/001 Version No:1 Emergency Preparedness Plan for BTSF, 6 June 2023 includes actions to lower tailings pond levels if required. Section 6.5. Lower tailings pond level – In an early stage of either piping or overtopping scenario actions taken to achieve a lower water level on TSF include stopping tailings discharge into the tailings impoundment (shut down the mill). If this action is unable to lower pond level sufficiently, the supernatant pond will be pumped to the wastewater treatment plant for

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treatment and discharge in line with the Ghana Environmental Protection Agency (EPA) effluent discharge guidelines.

Inspections

Plant Area

Daily

Daily Inspection and Cyanide Sparging (Processing), includes PPE, safety showers, fire extinguishers, leakage check on the tank/ pipelines/ valves/ pump, checks prior to cyanide sparging.

Weekly

Procedure for cyanide storage, dosing and first aid facilities checklist for weekly inspections, IP-CN-021, Rev. 7, 1 May 2025.

Weekly Inspection Checklist for Cyanide Storage, Dosing and First Aid Facilities: includes cyanide sparging facility, cyanide emergency cabin, cyanide delivery pipes and valve, cyanide management station and trailer, bund integrity inspection, emergency response trailer equipment inventory, emergency response cabinet equipment inventory, deviations report (deviations, action plan, person responsible, expected completion date, remarks), and tank integrity for CIL.

Weekly Processing Plant Safety Inspection Checklist, CIL, checklist No: IDP/PRO/MET/CH/001, Version No:1, 17 January 2025: Areas inspected includes the following:

- Thickeners working areas and bund areas (including structural integrity of bund areas and crash barriers);
- Lubricant bay and waste oil bay;
- Motor control Centres ;
- Circuit 01 and 02 (SAG Mill 01 & Ball Mill 01);
- CRV06/CRV07 and CVR08 Conveyor belts;
- Emergency equipment and general safety areas (including fire extinguishers, safety showers, safety signs); and
- Temporal scrap holding area.

Weekly KPI Report, form no: IDP/PRO/F/017, version no:1,. The Weekly KPI Report indicates inspections completed and accountable persons for issues identified during inspections. It also monitors the completion of tasks including identified hazards. Auditors observed a loose light fixing, which was identified as a safety hazard during the inspection. Auditors observed a request to raise an order on the 8 May 2025 to address the identified hazard.

Structural Inspections.

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Non-destructive testing (NDT) Inspection Report on CIL tank 03 prepared by inspectors and engineers, 30 August 2025. The report was signed off by Benjamin Nartey (Equipment Inspector).

Non-destructive testing (NDT) Inspection Report on CIP Tank 04, prepared by Inspectors and Engineers Co.Ltd, 12 December 2024. The report was signed off by George Gyedu-Nuakoh and Pieter van der Smit. The inspections for both reports included the following:

- Vacuum box inspection of lapped floor plate;
- Magnetic Particle inspection on the shell/annular plate joint;
- Ultrasonic Thickness measurement of lower shell plates; and
- Visual inspection of tank base and peripheral welds.

The auditors observed *Report on Structural integrity and visual condition assessment – SIMM Inspection Report*, Report No: IE/2024/SIMM/AG005, 9 March 2024. The report was signed off by Ing Simon Ando-Acquah and Engr Winifred Honu. The report covered all areas within the processing plant.

The Leach and CIL tanks are constructed on ring beams and form part of the Risk Based Inspection (RBI) program (using AIC-ITP-01-18, API 653, API 650 and in accordance with AAIL (Anglo American Inspection Laboratory) criterion for Non Destructive Testing (NDT)).

This is undertaken on a 3 year rolling inspection of the base plates and shells of the CIL and Leach tanks. A tank is taken off-line, approximately once every two to three months. There are 11 tanks therefore they are inspected every 2 – 3 years. The inspection is undertaken using NDT techniques to show if there are any leaks and for the thickness of the metal etc. If the inspection shows any requirement for maintenance a work order is placed to undertake the repairs.

The auditors observed the action plan prepared for the CIL plant, crushing plant, scats plant, workshops, overland on 20 May 2024. The action plan was developed based on structural inspections conducted by Inspectors and Engineers, and prioritized according to condition categories, with actions completed in order of priority. All critical actions were observed to have been completed at the time of the audit.

Tailings area

Daily

BTSF Daily Inspection Log Sheet, IDP/PRO/TSFD/F/004 includes the following.

- Freeboard check using an RTK instrument. Flood design for the TSF is a 1:100 24hr rainfall design flood in line with the Ghana Minerals Commission Regulation for TSF dams. The design is therefore to accommodate at a minimum 1:100 flood design.
- Visual inspection of seepage around the TSF.
- Wildlife mortality in or around the TSF.
- Condition of emergency spillway.
- Rainfall occurrence.

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Weekly

Weekly inspections include the following: Pool size, signs of instability, crack, slouging, piping, access roads, vegetation growth and other activities round the TSF. Record for 21 March 2025 was observed.

Quarterly

Quarterly inspections are undertaken by a third party, Glocal Engineering Limited. The quarterly report details construction and maintenance activities, TSF water management, environmental monitoring around the TSF, embankment stability, emergency action plan and closure.

Planned Maintenance System

The SAP (System Analysis Programme) PMS is used for planned and preventive maintenance as well as for corrective maintenance. Most of the equipment is on a monthly schedule of preventive maintenance, but variations may occur depending on the equipment. A list of the equipment within the PMS was observed including: tanks, pumps, inline pH monitor, fixed cyanide monitors, WAD analyser, cyanide analyser, safety showers, and generators. Inspections include mechanical and electrical. All activities undertaken in the SAP system are documented electronically, which were observed by the auditors.

Job cards are also raised through the SAP system where ad hoc maintenance is required by inspections of the Plant or observations from Plant Operators. The following was observed by the auditors.

The operation implements procedures 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.

Change Management

Procedure for Change Management on Installations/Equipment's, IP-CN-046, Rev. 8, 1 May 2025. The procedure provides guidance on the management of risks that may result from any change to the environment, person, process, equipment, material or any other substances. The major components of the change management process include the following: identify change, describe change inform management, approve change, conduct risk assessment, authorising plan, communicate and implement change, temporary / emergency changes, monitoring. The procedure includes a table stipulating the responsible parties that should approve specific types of changes, i.e. any changes to chemicals / reagents or their suppliers to be signed off by Snr Manager Processing/Snr Manager Engineering// Safety Officer/Snr Manager HSE/Cyanide Champion/Ag Snr. Manager Processing.

Contingency Procedures

The operation has cyanide management contingency procedures for non-standard operating situations that may present a potential for cyanide exposures and releases including the following.

- a) An upset in the operational water balance that presents a risk of exceeding the design containment capacity.

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HSE Procedure No: IDP/HSE/PRO/ERP/P/001 Version No:1 Emergency Preparedness Plan for BTSF, 6 June 2023. The Plan includes actions to lower tailings pond levels.

Section 6.5. Lower tailings pond level – In an early stage of either piping or overtopping scenario actions taken to achieve a lower water level on TSF include stopping tailings discharge into the tailings impoundment (shut down mill). If this action is unable to lower pond level sufficiently, the supernatant pond will be pumped to the wastewater treatment plant for treatment and discharge in line with the Ghana EPA effluent discharge guidelines.

b) Problems identified by monitoring or inspection.

The SAP PMS raises a work order and records the corrective actions and corrective maintenance that is being undertaken when inspections or monitoring identifies a problem.

c) Temporary closure or cessation of operations due to situations such as work stoppages, lack of ore or other essential materials, economics, civil unrest, or legal or regulatory actions.

Procedure to follow for cyanide management when major upsets occur, IP-CN-044, Rev. 8, 1 May 2025 – this procedure describes the steps to follow for cyanide management when major upsets or delays occur in the normal processing of ore including the following:

- Extended plant water supply failure;
- Prolonged halt in ore treatment for safety reasons;
- Prolonged halt in ore treatment due to governmental or executive directives;
- Extended ore delivery system failure causing treatment stoppage due to ore shortage;
- Tailings dam failure on the prolonged impact on production;
- Damage or disabling of the circuit by acts of God, making extended operation impossible or unsafe;
- Extended failure of essential services (e.g. compressed air, electricity); and
- Any event causing a significant delay.

Procedure for Total Power Failure on the Plant, 1 May 2005, states that all hazardous materials are to be contained and secured by closing the relevant valves.

These procedures include the actions required for both short-term and long-term shutdowns. In the short-term agitators will still be running although tailings may cease to be pumped to the TSF. In the long term the liquid cyanide stored in the mixing and dosing tanks will be utilised so that they remain empty with the leach and CIL tanks also being emptied through the tailing in the tanks being pumped to the TSF.

These procedures sufficiently address how cyanide would be safely managed during long-term shutdowns or cessation of operations including the management of any cyanide solution within tanks.

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The operation inspects the following at unloading, storage, mixing and process areas, including tanks, secondary containments, pipelines, pumps, valves, and ponds. The following were observed.

- d) Tanks holding cyanide solutions for structural integrity and signs of corrosion and leakage.
- Daily Inspection and Cyanide Sparging (Processing), includes PPE, safety showers, fire extinguishers, leakage check on the tank/pipelines/valves/pump, checks prior to cyanide sparging.
 - The following inspections are undertaken to check for structural integrity, signs of corrosion and leakage - Report on Structural integrity and visual condition assessment – SIMM Inspection Report, Report No: IE/2024/SIMM/AG005, 9 March 2024.
- e) Secondary containments provided for tanks and pipelines for physical integrity, the presence of fluids and available capacity, and to ensure that any drains are closed and, if necessary, locked, to prevent accidental releases to the environment.
- The following inspections are undertaken to check the secondary containments for tanks and pipelines - Weekly Processing Plant Safety Inspection Checklist, CIL, checklist No: IDP/PRO/MET/CH/001, Version No:1, 17 January 2025.
- f) Leak detection and collection systems at ponds, as required in the design documents.
- The only leak detection and collections systems are for the TSFs. The Event Pond within the Plant is lined with high density polyethylene (HDPE) and should be kept empty whenever possible. The TSF leak detection and collection systems are monitored as part of the daily and weekly TSF inspections.
- g) Pipelines, pumps and valves for deterioration and leakage.
- The following inspections are undertaken for deterioration and leakage of pipelines, pumps, and valves. Weekly Inspection Checklist for cyanide storage, dosing and first aid facilities, includes cyanide sparging facility, cyanide emergency cabin, cyanide delivery pipes and valve, cyanide management station and trailer, bund integrity inspection, emergency response trailer equipment inventory, emergency response cabinet equipment inventory, deviations report (deviations, action plan, person responsible, expected completion date, remarks).
- h) Ponds and impoundments for the parameters identified in their design documents as critical to their containment of cyanide and solutions and maintenance of the water balance, such as available freeboard. The TSF is a raised construction and therefore no surface water diversion structures are required to maintain the water balance.
- The Plant Event Pond, an HDPE lined pond, is kept empty wherever possible. This was observed by the auditors during the site visit.

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- The freeboard at the TSFs, and integrity of the surface water divisions are observed and measured during the following inspections - daily inspections that include the following:
 - Freeboard check using an RTK instrument. Flood design for the TSF is a 1:100 24hr rainfall design flood in line with the Ghana Minerals Commission Regulation for TSF dams. The design is therefore to accommodate at a minimum 1:100 flood design.
 - Visual inspection of seepage around the TSF.
 - Wildlife mortality in or around the TSF.
 - Condition of emergency spillway.

The operation inspects the cyanide facilities on an established frequency sufficient to ensure and document that they are functioning within design parameters. Plant inspections are conducted on a daily and weekly basis with structural inspections of the Plant every three years and inspections of the leach tanks undertaken on a rolling 3 year basis. The TSF is inspected on a daily, weekly, and quarterly basis. The TSF sumps are part of the leak detection system that is inspected as part of the daily inspection.

For the preventive maintenance, inspection activities are being undertaken as required by the specific piece of equipment, with the period being anything between daily to yearly. The records are on the SAP PMS.

It is concluded that the inspection frequency is adequate to assure that the facility operates within design parameters.

The inspection reports and checklists identify the specific items to be observed and include the date of the inspection, the name of the inspector, and any observed deficiencies. The nature and date of any corrective action is documented through the SAP planned maintenance system where the work orders are generated. The records are retained through the SAP PMS.

The mine undertakes a number of operational inspections as well as health and safety inspections to ensure the facility is being operated in a safe and environmentally sound manner.

The SAP PMS is used for planned and preventive maintenance as well as for corrective maintenance. Most of the equipment is on a monthly schedule of preventive maintenance, but variations may occur depending on the equipment. A list of the equipment within the PMS was observed including: tanks, pumps, inline pH monitor, fixed cyanide monitors, WAD analyser, cyanide analyser, safety showers, and generators. Inspections include mechanical and electrical. All activities undertaken in the SAP system are documented electronically, which were observed by the auditors.

In the event of an interruption of power the leach is held in the leach tanks, the cyanide solution is held in the pipeline, any leaks drain back to the bunded area for the mixing and dosing tanks. The tailings pipelines are equipped with valves which close in the event of power failure to prevent the flow back of tailings. Any leaks from the Tailings pipeline drains back to the 2000 m³ Emergency Spillage Dam.

Procedure for Total Power Failure on the Plant, 1 May 2005, states that all hazardous materials are to be contained and secured by closing the relevant valves.

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The operation has 3 emergency diesel generation sets at the plant in the event of a power failure. This includes one for the plant agitators, one to power the TSF pipeline taking slurry to the TSF, and one for the general activities at the Plant e.g. lights etc.

The operation has another 2 emergency generator sets that are available at the TSF to power the pumps. In the event that the TSF needs to pump water during a power failure to maintain the freeboard the water will be pumped to Block 3 or 4 which are unused pits used for storing raw process water.

The generator sets are maintained and tested as part of the Planned Maintenance System.

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Standard of practice 4.2: Introduce management and operating systems to minimise cyanide use, thereby limiting concentrations of cyanide in mill tailings.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.2; introducing management and operating systems to minimise cyanide use, thereby limiting concentrations of cyanide in mill tailings.

The operation implements a program to evaluate cyanide use in the Plant and adjust the addition rate to minimize its use.

The optimisation study is conducted annually on the ore that is mined to determine the free cyanide set point. The mine sometimes experiences changes in the ore mineralogy as well as changes in throughput rate and grade and therefore needs to determine the optimal set point to ensure optimal gold recovery. The test work performed seeks to assess the impact of cyanide on the leaching kinetics of the CIL plant as a way of optimising its usage without compromising recovery. The test work included taking a sample from the leach feed after which it is filter pressed and oven dried to reduce the moisture content in preparation for bottle roll tests. The test results provide the plant with the optimum dosage rates. External test work is conducted by the University of Mines and Technology when there is a change in ore blend from the various pits (forward planning).

In September 2021, drill core and crushed samples from AAIL were sent to the Minerals Engineering Department, the University of Mines and Technology (UMAT) for geometallurgical, rheological, settling, Gravity Recovery testing (GRG) characterisation, concentrate intensive cyanidation and GRG tailings, CIL and Leach Well testing. The sources of the ore samples were from Ajopa, Block 3, and Block 7&8 (Cut 2 and Cut 6) and Block 4. The effect of different cyanide concentrations and leach time on Au recovery were examined. All other plant conditions were maintained.

The auditors observed the following:

- *University of Mines and Technology, Tarkwa Minerals Engineering Department, Final Report on AAIL - Iduapriem Expansion Recovery Studies (12476330), April 2022.*
- *University of Mines and Technology, Tarkwa Minerals Engineering Department, CIL gravity Tails CN effect' Results Spreadsheet, January 2025.*

Daily manual titrations are conducted every 4 hours to confirm that the online cyanide addition system (TAC 1000) is working correctly. The TAC 1000 system takes a sample every 30 minutes to confirm that the cyanide addition is as per the set point.

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Changes in the set point are recorded in the Shiftly Notebook and communicated by the Metallurgical Superintendent to the Shift Metallurgist. The set point is then adjusted on the TAC 1000.

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Standard of practice 4.3: Implement a comprehensive water management program to protect against unintentional releases.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.3**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.3; implement a comprehensive water management programme to protect against unintentional releases.

The operation has developed a comprehensive, probabilistic water balance.

The operation uses Operational Simulation (OPSIM) to forecast of water storage facilities on site and for calibrating storage facilities to ensure accurate results.

A daily spreadsheet is used to collect operational data that is included in the water balance by the Senior Officer for Water Management. The team using the water balance on the mine has received training from the software developer. The water balance is probabilistic and is used by the mine to simulate wet and dry season scenarios into the future.

The auditors observed the *BTSF Water Balance 2025*.

Configuration. The model uses the daily precipitation records together with 40 years of historic rainfall records (UMAT data from 1992) to model the uncertainty and variability in the prediction of precipitation patterns, including the ability to consider the frequency and distribution of precipitation events along with extremes and seasonal variations.

The water balance considers the following in a reasonable manner and as appropriate for the facilities and the environment. The water balance model includes the following:

- a) The rates at which solutions are applied to leach pads and the rates at which tailings are deposited into tailings storage facilities.

The forecasted annual tailings deposition is included in the model, including the moisture content that will be retained in the tailings once deposited. Any change in the forecasted annual deposition will be updated by the mine in the model. The model is updated annually at a minimum with actual rates. Whenever there is a change in operations or a change in parameters, the model is updated.

- b) 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.

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It was verified that the OPSIM model, can be run with a 1:100 year 24 hour storm event (297 mm in 24 hour) to simulate the potential of overtopping and the model is calibrated with actual site data from 1977 to date.

- c) The quality of existing precipitation and evaporation data in representing actual site conditions.

Rainfall data is collected from 4 stations, namely at the Administration Block, at the TSF, and at Block 8 since early 2000. Rainfall data has been collected at the University of Mines and Technology Meteorological Station rainfall data since January 1977. The evaporation data is currently estimated but there is an evaporation pan recently obtained and will be used to get actual evaporation rates.

- d) The amount of precipitation entering a pond or impoundment resulting from surface run-on from the up-gradient watershed, including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground.

The model includes, where appropriate, the amount of precipitation entering a pond or impoundment resulting from surface run-on from the up gradient watershed e.g. TSF, Block 3 and Block 4 (the Blocks are disused pits used for water storage), including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground. The catchment is defined for each of the water containment facilities through a catchment delineation map.

- e) Effects of potential freezing and thawing conditions on the accumulation of precipitation within the facility and the up gradient watershed.

This is not applicable as the mine is in a tropical zone.

- f) Solution losses in addition to evaporation, such as the capacity of decant, drainage and recycling systems, allowable seepage to the subsurface, and allowable discharges to surface water.

The model includes TSF decant water to the Plant and to Block 3 and Block 4. If necessary excess water is sent to the water treatment plant, although this is infrequent. Seepage to subsurface is included in runoff calculations. The first raise of the TSF is fully lined with HDPE hence the model assumes negligible seepage through HDPE liner.

- g) The effects of potential power outages or pump and other equipment failures on the draindown from a leach pad or the emergency removal of water from a facility. The model can simulate a shutdown scenario (including the duration of the shutdown).

This will mean that no tailings are sent to TSF and pumping rates are set to zero. The TSF pumps have 2 emergency generators available as back up in the event of a power failure. Three gensets are available at the Plant to agitate the CIL until full power is restored. The TSF is designed to be able to accommodate a 1:100 yr 24 hr storm event. However, the TSF currently has significant excess capacity with an 11 m freeboard.

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- h) Where solution is discharged to surface waters, the capacity and on-line availability of necessary cyanide treatment, destruction. or regeneration systems.

There are no destruction or regeneration systems required. The mine has a water treatment plant which can process water prior to it being discharged. The operation is permitted to discharge to the environment however this has not taken place as all treated water is stored in Block 4 and Block 3 West since April 2025.

- i) Other aspects of facility design that can affect the water balance, such as the assumed phreatic surface in a tailings storage facility.

The model includes interstitial water in the tailings (percentage of water retained in the slurry) which is calculated to be 37%.

Ponds and impoundments are designed and operated with adequate freeboard above the maximum design storage capacity determined to be necessary from water balance calculations.

The TSF has been designed with a minimum freeboard requirement of 1.5 m, it is operated accordingly and TSF water levels and freeboard are monitored daily. The freeboard at the time of the audit was 11 m. The water from the supernatant pond can be pumped to the Plant, Block 3 or the water treatment plant and subsequently Block 4. Two emergency generators are available to ensure pumping during a power failure.

The Emergency Spillage Pond is kept empty where possible.

The operating procedures incorporate inspection and monitoring activities as necessary to implement the water balance and prevent overtopping of ponds and impoundments and unplanned discharge of cyanide solutions to the environment including the following.

- Daily tailings pipeline and TSF inspections.
- Weekly TSF inspections: HSE Planned Inspection Sheet Weekly TSF Inspection Log Sheet.
- Quarterly TSF Inspections: AngloGold Ashanti Iduapriem AAIL.

Ponds and impoundments other than the TSF are all constructed with sumps and automated pumps that feed back to the Plant. Excess water is stored in Block 3 and 4 which are disused pits and whose capacity has never been exceeded.

Auditors observed a draft procedure for pumping excess water from the Iduapriem mine TSF – *Pumping Excess Water from the Iduapriem Mine TSF, IDP/PRO/TSF/P/009, 13 November 2025.*

The operation measures precipitation, comparing the results to design assumptions and revising operating practices as necessary.

Rainfall data is collected from 4 stations, at the Administration Block, the TSF (2), and Block 8 since early 2000. The BTSF monitoring station was installed in 2023. Rainfall data has been collected at the University of Mines and Technology Met Station rainfall data since January 1977. This data is fed into the water balance on a daily basis and used to compare design assumptions.

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Standard of practice 4.4: Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.4**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation 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.

The operation does not have any open water where it is necessary to implemented measures to restrict access by wildlife and livestock as the WAD cyanide in open water does not exceeds 50 mg/l.

Daily trend for WAD monitoring in the Tailings Hopper prior to it entering the Tailings pipeline for the period between 1 January 2022 to 12 October 2025, had no exceedances of the 50 ppm limit over the period. The monitoring system by the team has set a trigger value of 42.69 ppm to take action to ensure it doesn't exceed 50 ppm. If it exceeds this 42.69 ppm because a tank has been taken offline or some other operational reason, an action may be to increase the dilution factor of tailings reporting to the TSF.

The auditors observed the monitoring data for the feed to and from the Concrete Dam in the Plant as well as where it enters the Block 4. All monitoring data was below 0.5 mg/l WAD cyanide. The auditors observed the data from the 15 September 2025 to the 15 October 2025.

The Emergency Spillage Dam is kept empty where possible.

The BTSF Pool WAD cyanide is analysed on a monthly basis. Auditors observed record for the data from 3 July 2023 to 18 August 2025. Since April 2025, water from the water treatment plant reports to Block 3 West and not Block 4.

The Block 3 sump which receives decant water from the BTSF is monitored monthly for WAD cyanide. All of the data showed the WAD cyanide to be below 50 mg/l.

Maintaining a WAD cyanide concentration of 50 mg/l or less in open water is effective in preventing significant wildlife mortalities.

The TSF and Plant are inspected for wildlife mortalities on a daily basis. No wildlife mortalities have been recorded since the previous recertification audit.

All of the heap leaches have been decommissioned.

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Standard of practice 4.5: Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.5**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard 4.5 to implement measure to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

The only direct discharge to surface water is from the UEE Dam that receives surface runoff from the catchment. The is monitored biweekly and daily when any discharge to surface water is being undertaken. The auditors observed WAD CN records from 1 January 2025 to August 2025 with all records being below 0.5 mg/l WAD cyanide.

Water from the Wastewater Treatment Plant is tested against the Ghanaian Standard for Discharge, before it is transferred to Block 4 (a disused pit) via a pipeline. Water from Block 4 is reused in the process when there is insufficient water from the TSF. Since April 2025, this water is now transferred to Block 3 West.

The auditors observed the monitoring data for the feed to Block 4 and Block 3 West. All monitoring data was below 0.5 mg/l WAD cyanide.

The operation monitors for cyanide in surface water downgradient of the site.

Surface water monitoring points downstream from the site were identified as the following:

- ICGAH (a Tributary of the Angonabeng Stream) downstream from the mine and TSF;
- SW3 (downstream of the discharge from the UEE Dam); and
- UEE Dam (within the Dam itself).

ICGAH is sampled on a monthly basis with the data from the 1 January 2023 to 18 August 2025 being observed by the auditors. All records were below 0.022 mg/l free cyanide.

SW3 is sampled biweekly and daily when water is being discharged from the UEE Dam. The results for the 11 January 2022 to 12 August 2025 were observed. There were two exceedances on the 6 February 2024 the free cyanide was 0.037 mg/l and on the 27 November 2024, it was 0.1 mg/l.

UEE is monitored biweekly and daily when water is being discharged. Auditors observed monitoring data from 1 January 2025 to August 2025 and there were 7 exceedances with the highest being 0.105 mg/l free cyanide.

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There is no indirect discharge to the surface water, auditors reviewed the surface water monitoring data and this does not indicate any indirect discharge with the results being below 0.005 mg/l WAD and free cyanide respectively.

No solutions from any spillage containments are released to the environment. The Plant is designed with bunds for all tanks, which have sumps and pumps automatically returning any spillage to the process.

Any spillage outside of a bunded area in the Plant will drain to the Emergency Spillage Pond that is HDPE lined and kept empty where possible.

The BTSF is HDPE lined and equipped with 10 underliner sumps that will collect any seepage below the liner and drain it to sumps on the side of TSF. There are also herring bone drains connected to 22 top liner sumps. Any seepage entering any of these sumps is pumped back on to the TSF. There are paddocks around the TSF that will collect any seepage from the walls of the TSF.

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Standard of practice 4.6: Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.6**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.6 to implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

The operation implements specific water management and other measures to manage seepage to protect the beneficial use of groundwater beneath and / or immediately down gradient of the operation. This includes the following.

The BTSF is HDPE lined and equipped with 10 underliner sumps that will collect any seepage below the liner and drain it to sumps on the side of TSF. There are also herring bone drains connected to 22 top liner sumps. Any seepage entering any of these sumps is pumped back on to the TSF. There are paddocks around the TSF that will collect any seepage from the walls of the TSF.

The Emergency Spillage Pond is HDPE lined and kept empty where possible.

The operation monitors for cyanide in groundwater downgradient of the site and can demonstrate that concentrations of WAD cyanide in groundwater at compliance points below or downgradient of the facility are at or below levels that are protective of identified beneficial uses of the groundwater.

Groundwater monitoring boreholes immediately downstream the TSF were observed. I-BMB 2S and I-BMB 2D, I-BMB 3S, I-BMB 3D, I-BMB 4D are monitored for WAD and all of the results for 2022 – 2025 were below the 0.005 mg/l detection limit.

Borehole I-BMB 3D is used for non-potable domestic uses for the mine.

Borehole I-WBUT is used for potable uses for the mine.

These abstractions are permitted by the Ghanaian regulatory regime.

The groundwater in the immediate vicinity of the Plant and TSF is used by the Iduapriem and the neighbouring mines. Further downstream the beneficial uses of groundwater downgradient of the facility are likely to include the provision of drinking water and water for livestock as this is obtained via wells abstracting water from the local groundwater.

The mine is an open pit and mill tailings are not used as underground backfill.

All groundwater monitoring shows concentrations to be below the detection limit of 0.005 mg/l total, free and WAD cyanide and therefore no remedial action is necessary.

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Standard of practice 4.7: Provide spill prevention or containment measures for process tanks and pipelines.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.7**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.7; Provide spill prevention or containment measures for process tanks and pipelines.

Spill prevention or containment measures are provided for all unloading, storage, mixing and process solution tanks.

The Leach and CIL tanks are on constructed on ring beams and form part of the Risk Based Inspection (RBI) program (using AIC-ITP-01-18, API 653, API 650 and in accordance with AAIL (Anglo American Inspection Laboratory) criterion for Non Destructive Testing (NDT)).

This is undertaken on a 3 year rolling inspection of the base plates and shells of the CIL and Leach tanks. A tank is taken off-line, approximately once every two to three months. There are 11 tanks therefore they are inspected every 2 – 3 years. The inspection is undertaken using NDT techniques to show if there are any leaks and for the thickness of the metal etc. If the inspection shows any requirement for maintenance a work order is placed to undertake the repairs.

The auditors also observed *Non-destructive testing (NDT) Inspection Report on CIP Tank 04, prepared by Inspectors and Engineers Co. Ltd, 12 December 2024*, which includes:

- Vacuum box inspection of lapped floor plate;
- Magnetic Particle inspection on the shell/annular plate joint;
- Ultrasonic Thickness measurement of lower shell plates; and
- Visual inspection of tank base and peripheral welds.

It was confirmed during the site assessment that all tanks (cyanide mixing, storage, CIL, and elution,) are located inside concrete bunds which were all in good condition at the time of the site visit. The tanks (excluding CIL and Leach tanks) are all constructed with concrete bases.

All of the bunds are equipped with sumps and automated pumps such that any spillage is pumped back into the process. The sparging tanker is parked in a concrete bay that drains to the cyanide mixing and dosing tank bund.

Auditors observed the tank inspection/maintenance programme or schedule for 2025.

The auditors observed the action plan prepared for the CIL plant, crushing plant, scats plant, workshops, overland on 20 May 2024. The action plan was developed based on structural inspections conducted by Inspectors and Engineers, and prioritized according to condition

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categories, with actions completed in order of priority. All critical actions were observed to have been completed at the time of the audit.

Secondary containments for cyanide unloading, storage, mixing 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 auditors observed that the secondary containments were sized as follows:

- Cyanide Sparge Tank - 150 m³, bund 180 m³
- Largest Leach volume - 1980 m³, bund 2738 m³
- Largest CIL volume - 1460 m³, bund 2738 m³
- Largest Elution tank - 47 m³, bund 58 m³
- ILR - 13.6 m³, bund 25 m³
- Emergency spillage dam - 2000 m³

Procedures are in place and being implemented to prevent any discharge of a cyanide solution or cyanide contaminated water that is collected in a secondary containment area to the environment. No solutions from any spillage containments are released to the environment. The Plant is designed with bunds for all tanks, which have sumps and pumps automatically returning any spillage to the process.

Any spillage outside of a bunded area will drain to the Emergency Spillage Pond that is kept empty where possible.

All of the cyanide process tanks have secondary containment however the Leach and CIL tanks are constructed on ring beams. If leaks through the base of the Leach or CIL tanks are detected, when they are taken off-line and inspected every three years, remediation of any contaminated soil will be undertaken in accordance with *Procedure for Cyanide Spillage, Release of HCN and Communication with Corporate Offices, IP-CN-012, Rev 8, 1 May 2025*.

Spill prevention or containment measures are provided for all process solution pipelines to collect leaks and prevent releases to the environment. The pipelines transporting cyanide solution from the cyanide dosing tank to the dosing point in Leach Tank 1 are located in a launder such that any leaks will flow back to the concrete bund for the cyanide mixing and dosing tanks. Any solution within this bund is automatically pumped to the process via Leach Tank 1.

The TSF pipelines are placed inside HDPE lined trenches draining back to the TSF or into the Emergency Spillage Dam adjacent to the Plant that is constructed of concrete. Any solution within this Dam is automatically pumped back into the process. The Plant pipelines are inspected as per the shiftly inspection checklist and in accordance with the SAP PMS. The Tailings Pipeline is inspected on a daily basis as part of the TSF Daily Inspections.

These procedures and processes together with the physical separation of pipelines from surface water means that no additional special protection is required.

Cyanide tanks and pipelines are constructed of materials compatible with cyanide and high pH conditions. The tailings lines are constructed of an HDPE pipe inside a steel pipe, return water lines are constructed of HDPE. The dosing pipes are made of stainless steel and

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HDPE, with other process pipes made of HDPE. The cyanide mixing, dosing, leach, ILR, and elution tanks are all constructed of mild steel.

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Standard of Practice 4.8: 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 in substantial compliance with **Standard of Practice 4.8**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.8; to implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

Quality assurance and quality control (QA/QC) programs have been implemented during construction of all new cyanide facilities and modifications to existing facilities, including cyanide unloading, storage, mixing facilities and other cyanide facilities. The QA/QC for the operation's cyanide facilities were addressed in the original International Cyanide Management Code (ICMC) certification audit and the subsequent recertification audits.

The construction of the cyanide storage area was constructed by Orica as a turnkey project and the QA/QC documentation has been retained.

The quality assurance and quality control programs for the replacement of the cyanide mixing and storage tanks with fibreglass tanks were addressed in the last recertification audit with the documentation being retained on site.

There have been no substantial modifications to the Plant since the last recertification audit. Due to the age of the Plant the original QA/QC documentation is not available.

Since the 2022 recertification audit, the old GTSF has been decommissioned and the BTSF was commissioned in 2023. The following construction QA/QC documentation for the BTSF was observed by the auditors:

- Jones & Wagener Ghana Ltd 8 January 2023, The Construction of Phase 1 of the Beposo Tailings Storage Facility (BTSF) at Iduapriem. Certificate no TOC/01, Contract No, IDU 4501992256, Construction of Phase 1 of the Beposo Tailings Storage Facility. Signed off by P v/d Smit, Peter Raw and V Maharaj
- Contract No IDU4501988488, the construction of Phase 1 of the Beposo Tailings Storage Facility at Iduapriem, Project Close out report, Revision 01, 8 January 2025

The report includes project scope and description of works, project team, HSE progress on construction, costs, change management, quality management, commissioning and handover.

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Section 8 Quality Management includes:

- Field density tests results – 10228 nuclear densometer tests and 17 replacement tests;
- Concrete strength tests – 1566 tests; and
- HDPE Liner tests.

The report was signed off by T Nefdt and Pieter v/d Smit as representative of Jones & Wagener Ghana.

The quality control and quality assurance programs as detailed above have addressed the suitability of materials and adequacy of soil compaction for earthworks and the installation of synthetic membrane liners.

Appropriately qualified people have reviewed cyanide facility construction and provided documentation that the facility has been built as proposed and approved for the Tailings Storage as detailed above.

There is no available quality control and quality assurance documentation or as-built certification for the construction of the Plant. Therefore, an appropriately qualified person has inspected those facilities and issued a report concluding that their continued operation within established parameters will protect against cyanide exposures and releases as detailed below.

Structural Inspections.

The auditors observed the following inspection reports.

Non-destructive testing (NDT) Inspection Report on CIP Tank 04, prepared by Inspectors and Engineers Co.Ltd, 12 December 2024. The report was signed off by George Gyedu-Nuakoh and Pieter van der Smit. The results in the report observed includes:

- Vacuum box inspection of lapped floor plate
- Magnetic Particle inspection on the shell/annular plate joint
- Ultrasonic Thickness measurement of lower shell plates
- Visual inspection of tank base and peripheral welds

Non-destructive testing (NDT) Inspection Report on CIL tank 03 prepared by inspectors and engineers, 30 August, 2025. The report was signed off by Benjamin Nartey (Equipment inspector). The results in the report observed includes:

- Vacuum box inspection of lapped floor plate
- Magnetic Particle inspection on the shell/annular plate joint
- Ultrasonic Thickness measurement of bottom shell plates
- Visual inspection of tank base and peripheral welds

The auditors observed *Report on Structural integrity and visual condition assessment – SIMM Inspection Report*, Report No: IE/2024/SIMM/AG005, 9 March 2024. The report was signed off by Ing Simon Ando-Acquah and Engr Winifred Honu.

The report covered all areas within the processing plant and looked out for the following:

- Cracks on concrete walls;
- Spalling on walls and concrete;

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- Dampness on concrete;
- Vegetation and algae growth on walls;
- Corrosion of steel structures ;
- Bending or deflection of steel structures; and
- Chemical attack on concrete bases.

The Leach and CIL tanks are on ring beams and form part of the Risk Based Inspection (RBI) program (using AIC-ITP-01-18, API 653, API 650 and in accordance with AAIL (Anglo American Inspection Laboratory) criterion for Non-Destructive Testing (NDT)).

This is undertaken on a 3 year rolling inspection of the base plates and shells of the CIL and Leach tanks. A tank is taken off-line, approximately once every two to three months. There are 11 tanks therefore they are inspected every 2 – 3 years. The inspection is undertaken using NDT techniques to show if there are any leaks and for the thickness of the metal etc. If the inspection shows any requirement for maintenance a work order is placed to undertake the repairs.

TSF

Quarterly inspections are undertaken by a third party. 4th Quarter 2024 BTSF environmental audit report prepared by Glocal Engineering Limited, March 2025. The quarterly report details construction and maintenance activities, TSF water management, environmental monitoring around the TSF, embankment stability, emergency action plan and closure. This report showed an average freeboard of 11 m.

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Standard of Practice 4.9: Implement monitoring programs to evaluate the effects of cyanide use on wildlife, and surface and groundwater quality.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.9**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.9; to implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and groundwater quality.

The operation has developed written standard procedures for monitoring activities. The following procedures were observed.

Iduapriem Mine, Surface Water Monitoring Procedure, IDP/ENV/P/019, Rev 3, 28 February 2024.

Iduapriem Mine, Groundwater Monitoring Procedure, IDP/ENV/P/018, Rev. 4, 28 February 2024.

These procedures are applicable to the sampling of streams, rivers and containment systems. This includes responsibilities, PPE requirements, calibration of field equipment, sample procedures and field information, sample identification, quality control, sample preservation, sample shipment, analysis of samples, data management, water level measurement, well purging and sampling of monitoring boreholes, and sampling of drinking water boreholes.

Iduapriem Mine, Wildlife Mortality Procedure IDP/ENV/P/013, Rev 2, 28 February 2024.

This procedure describes how to handle wildlife (including birds, reptiles, and mammals) and livestock mortality and AAIL's mining lease concession to establish the cause of death and put measures in place to avoid recurrence.

The sampling and analytical procedures have been developed by an appropriately qualified person. Procedures were developed by Philp Nyoagbe, Senior Officer for Water Management - BSc in Geological Engineering (Major in Hydrogeology and Geotechnical Engineering) 17 years of experience, and Ruth Owusu Akyaw, Environmental Superintendent for Compliance - BSc in Chemistry, and 20 years' experience.

The sampling points are indicated on the Water Monitoring Maps. The groundwater and surface water procedures specify how samples should be taken, sample preservation techniques, chain of custody procedures (sample submission sheet accompanies the samples to the external lab), shipping instructions, cyanide species to be analysed and quality assurance and quality control requirements.

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Auditors observed the sample receipt checklist. Sheets include the date of submission, sample type, no. of samples, sample number, details on the sample, comments, analyses required. Sample receipt checklist was observed for 21 December 2023.

Chain of Custody Book for 2025, which includes; date/time of submission, submitted by, signature, received by, number of samples received, No. of WAD samples received, No. of Microbiology received, no of samples rejected.

Sampling conditions are documented in a field sample data sheet, including weather, livestock/wildlife activity, anthropogenic influences, etc., as observed by those sampling.

Environmental Field Sampled Data Sheets are completed during sampling runs. On the form the sampler completes the date, time, sample number, pH-F, conductivity, Turb-F, DO-F, Temp-F, TDS, weather conditions wildlife/livestock mortality, human activity, stater water level, casing height, remarks.

Monitoring is undertaken at frequencies to adequately characterise the medium being monitored, and to identify changes in a timely manner.

WAD cyanide monitoring is conducted at the following locations and frequencies:

- WAD cyanide in the tailings is monitored daily.
- Wildlife mortality is monitored daily.
- Groundwater boreholes are monitored monthly.
- The BTSF decant water is analysed monthly.

Free cyanide monitoring is conducted at the following surface water locations and frequencies:

- UEE Dam and SW3 are monitored biweekly/daily depending on whether a discharge is taking place.
- ICGAH is monitored monthly.

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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: 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 in substantial compliance with **Standard of Practice 5.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 5.1; to plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.

The operation has developed written procedures to effectively decommission cyanide facilities at the cessation of operations.

The *Decommissioning Procedure, IP-CN-045, Rev 8, 1 May 2025* describes the planning required to ensure the safe decommissioning and decontamination of cyanide facilities within the metallurgical plant.

In addition, the *AngloGold Ashanti Iduapriem Mine Updated Mine Closure Plan, Rev C, November 2024* prepared by Knight Piesold details the current plan for the decommissioning of the mine.

A detailed closure plan must be submitted 60 days prior to decommissioning as required by the Ghanaian Minerals Commission (MINCOM) and the Ghana EPA. Once approved by MINCOM, a detailed Gant Chart will be compiled informing the decommissioning and closure process.

The Decommissioning Procedure describes the actions to be taken 12, 6 and 3 months prior to decommissioning to ensure that all cyanide storage areas, dosing pumps and pipelines as well as any cyanide contaminated equipment are made safe and decontaminated. It further describes the actions to be taken to decommission and safely dispose of any decontaminated cyanide equipment to prevent exposure to personnel and members of the public.

The Updated Mine Closure Plan includes the following:

Section 5.3 deals with the stabilisation and rehabilitation of the currently active TSF. The previously decommissioned TSFs have already been rehabilitated or are in the process of being rehabilitated i.e.the GTSF.

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Section 5.6 deals with the decontamination, decommissioning and demolition of the Plant and associated infrastructure. It requires that these facilities will be decontaminated to ensure that potential contamination is not washed into the environment by rainfall in line with the Cyanide Code.

The Greenfields Tailings Storage Facility (GTSF) Closure and Rehabilitation Plan, Rev A, 16 December 2024, prepared by Knight Piesold details the rehabilitation of the GTSF that is currently in the process of being rehabilitated.

The Decommissioning Procedure is reviewed every 2 years. The Mine Closure Plan is updated every 3 years.

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Standard of practice 5.2: Establish a financial assurance mechanism capable of fully funding cyanide related decommissioning activities.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 5.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 5.2; to establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.

The operation has developed an estimate of the cost to fully fund third party implementation of the cyanide-related decommissioning measures identified in its site decommissioning or closure plan.

The auditors observed the following.

Q2 2025 Iduapriem Environmental Liability Finance – current damage calculations

The operation has developed a detailed spreadsheet of the estimated cost to fully fund third party implementation of the cyanide related decommissioning measures to implement the closure plan. The cost includes the Processing Plant: and the BTSF, Phase 1 (the operational TSF).

The operation reviews the Environmental Liability Cost spreadsheet every quarter, which includes any changes that affect cyanide related decommissioning activities.

The operation has established a financial mechanism approved by the applicable jurisdiction to cover the estimated costs for cyanide-related decommissioning activities as identified in its decommissioning and closure strategy that includes the following.

Absa Bank of Ghana Limited, Performance Guarantee dated 1 November 2024; and

Standard Chartered Bank Ghana Plc, Performance Bond, dated 7 November 2024.

All the bank guarantees are addressed to the Ghanaian EPA and are updated annually.

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Principle 6 – Worker Safety

Protect Workers' Health and Safety from Exposure to Cyanide.

Standard of practice 6.1: Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 6.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 6.1 to identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.

The operation has developed written management and operating plans and procedures for the cyanide facilities including unloading, mixing and storage facilities, process plants, and tailings impoundments.

The operation does not have any heap leach, cyanide treatment, regeneration or disposal systems.

The operation has 42 Cyanide Procedures that include the following;

- *Procedure for Cyanide spillage, release of HCN and communication with corporate offices, IP-CN-012, Rev8, 1 May 2025;*
- *Procedure for Cyanide Sparging, IPCN-049, Rev 8, 1 May 2025;*
- *Procedure for entry into confined spaces, IP-CN-10, Rev 8, 1 May 2025;*
- *Procedure for Buddy system, IP-CN-047, Rev 8, 1 May 2025;*
- *Procedure for Decontamination and removal of cyanide contaminated – or redundant equipment from cyanide area, IP-CN-013, Rev 8, 1 May 2025; and*
- *Procedure for cyanide PPE decontamination, storage and disposal, IP-CN-005, Rev 8, 1 May 2025.*

TSF procedures include the following:

Iduapriem Gold Mine Beposo Tailings Storage Facility Operations, Maintenance and Surveillance Manual. Report No: JW204/22/H374 – Rev 1, March 2023 prepared by Jones & Wagener. The operations manual cover TSF management aspects such:

- Water management including monitoring of freeboard, phreatic levels, design floods seepage, pump station
- Maintenance works for monitoring instrumentation, pumps, access roads, seepage collection sumps and emergency pond.

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- Roles and responsibilities of persons in charge

The procedures require, where necessary, the use of personal protective equipment and address pre-work inspections.

The auditors observed the following procedure: *Cyanide PPE Protection Levels, IP-CN-035, Rev. 8, 1 May 2025* - the procedure forms the basis for cyanide specific PPE to be used when working with cyanide or cyanide reaction products by stipulating various levels of protection and the associated PPE to be worn. The protection levels are 1, 2 and 3 with level 3 being for confined spaces or where hydrogen cyanide gas exceeds 4.7 ppm.

When working in any of the cyanide areas a Chemical Work Permit is required and a Job Hazard Assessments (JHA) is undertaken as part of this.

The operation solicits and actively considers worker input in developing or reviewing and evaluating health and safety procedures.

The Iduapriem Document Control Kiosk is a platform on the AAIL system for managing the review and update of documents. The system shows the document owner (the one who makes the changes in the document), the accountable person who is the manager to approve the updated document, and the departments involved in the update of the procedure.

Weekly mine-wide HSE Meetings are held, any changes or updates of procedures are communicated during these meetings. The topic is initiated by the HSE Department and sent out to all departments.

One environment and one safety topic is covered at the weekly toolbox meetings.

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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 in substantial compliance with **Standard of Practice 6.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 6.2 to operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

The operation has determined the appropriate pH for limiting the evolution of HCN gas during mixing and production activities as detailed in the following.

- *Procedure for Emptying Cyanide Spillage Bund, IP-CN-030, Rev 8, 1 May 2025* - if spillage is due to running water during mixing, it can be pumped to the leach tanks by the Reagent Operator after establishing that the pH in the leach exceeds 10.5.
- *Procedure for spiking cyanide IP-CN-015* states the pH of the tank intended for spiking must be confirmed to be above 10.5

The operation has identified areas and activities where workers may be exposed to hydrogen cyanide gas or cyanide dust in excess of 10 parts per million (ppm) (11 mg/m³) on an instantaneous basis and 4.7 parts per million (ppm) (5 mg/m³) continuously over an 8-hour period, as cyanide and require use of appropriate personal protective equipment in these areas or when performing these activities.

The auditors observed the following Gas Reading Processing Spreadsheet for April 2025. This showed the gas readings taken in the Elution, Tailings Hopper, Leach tank, ILR, and Cyanide Sparging Area using a handheld monitor. There are fixed monitors in all of these areas. All readings were below 4.7 ppm with the highest reading being 0.2 ppm at the Tailings Hopper. Readings are undertaken once a month by the Environmental Department.

Signs were observed during the site audit showing the PPE to be worn in each of these areas, which includes a personal Draeger cyanide monitor.

The facility uses monitoring devices in process areas and for activities involving the management of cyanide to confirm that workers are not exposed to hydrogen cyanide gas or cyanide dust exceeding 10 parts per million (ppm) on an instantaneous basis and 4.7 parts per million (ppm) continuously over an 8-hour period, as cyanide.

There are 5 fixed HCN monitors (polytrons) used at the Plant one at each of the following areas: Leach Tank, Cyanide Plant 1, Cyanide Plant 2, Tails Hopper, ILR.

Workers undertaking activities in these areas are required to wear personal HCN monitors.

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

There are 5 fixed cyanide monitors and twelve personal HCN monitors and 5 multi gas (including HCN) monitors that are also available for use. The monitors are calibrated every 6 months by NEZO Oilfield Supplies Limited and the calibration records have been retained for at least 3 years.

Both the fixed and the personal monitors have an alarm at 4.7 ppm and 10 ppm hydrogen cyanide gas however the action is the same at both alarm levels as described below.

Procedure when Cyanide Alarms Activates at 4.7 ppm and Beyond, IP-CN-052, Rev. 1, 11 May 2025.

The procedure describes the process to be followed when high level alarms are activated limit by means of fixed or personal gas monitors when working in a cyanide area. This requires that the area is evacuated and that a trained employee, in Level 3 cyanide PPE checks the area if the 4.7 ppm alarm sounds and communicates the situation to the Cyanide Champion and Senior Safety Officer. Workers are not allowed back into the area until the levels have decreased below 4.7 ppm.

Warning signs have been placed where cyanide is used advising workers that cyanide is present, of any necessary personal protective equipment that must be worn, and that smoking, open flames and eating and drinking are not allowed.

The relevant warning signs have been placed where cyanide is used advising workers that cyanide is present, any additional PPE that must be worn, and that smoking, open flames and eating and drinking are not allowed at the Cyanide Sparging Area, CIL, ILR, Elution, and TSF as the identified cyanide facilities.

High strength cyanide solution is dyed for clear identification.

Cyanide Sparging Procedure, IPCN-049, Rev 7, 1 May 2025 section 6.2.3 includes the addition of caustic and carmoisine dye after the prefill. This requires the addition of the dye to the sparge vessel through the caustic hopper.

Showers, low-pressure eye wash stations and dry powder or non-acidic sodium bi-carbonate fire extinguishers are located at strategic locations throughout the operation where cyanide is used.

The safety showers and fire extinguishers are inspected during the weekly HSE Inspection, in addition, the fire extinguishers are checked monthly by the Emergency Fire Team as detailed in the following.

- Report from Fire Protection Ghana Limited, 25 August 2023. The report covered the servicing of 649 hand portable fire extinguishers.
- Report from Ardent Fire Protection Ghana Limited on 28 October 2024.

The reagent strength cyanide mixing and storage tanks and associated piping are coloured purple to demonstrate that they contain cyanide. The piping is also labelled 'Cyanide' and the direction of flow indicated.

The cyanide sparging tank and plant process tanks are colour coded in accordance with the Plant's colour coding system, for identification i.e. purple with a red stripe. The reagent

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strength cyanide pipelines, process solution pipelines, the slurry pipelines, and return water pipelines are all identified by labels including the flow direction indicated.

The Cyanide Safety Data Sheets are displayed on the gate at the cyanide sparging area and in the four emergency cabinets. The cyanide first aid procedure is displayed on the four emergency cabinets in the Plant and next to the first aid box at the TSF.

The following procedure is in place and being implemented to investigate and evaluate 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 in need of being revised - Iduapriem Mine, Accident / Incident Management Procedure, IDP/HSE/P/014, Rev. 9, 21 November 2020.

This details the procedure to report, investigate and manage actions associated with incidents and hazards to determine underlying causes in order to eliminate or reduce the potential of future recurrence by identifying and applying adequate control measures.

The incident investigation reports contained the following:

- Findings.
- Root causes.
- Systemic issues identified.
- Recommendations:
 - Long term planning;
 - Design and engineering;
 - Operations and maintenance;
 - Governance and oversight;
 - Monitoring and measurement; and
 - Organisational development.

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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 in substantial compliance with **Standard of Practice 6.3**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation 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.

The operation has water, oxygen, a resuscitator, antidote kits and a radio, telephone, alarm system or other means of communications or emergency notification readily available for use at cyanide unloading, storage and mixing locations and elsewhere in the Plant.

Radios and cell phones are the primarily means of communication.

Water, oxygen, resuscitators, and radios are available for use in the Plant and at the TSF. There are four emergency cabins available at the following locations in the Plant; Cyanide Sparging Area, Acid Mixing Area, Top of CIL, and ILR.

The site has Tripac-Cyano antidote kits at each of the emergency cabinets in the Plant however, these are only administered at the Sam Jonah Clinic by a trained medical professional, or by the paramedic who accompanies the ambulance to the location of the incident.

The operation inspects its first aid equipment regularly to ensure that it is available when needed, and that materials such as cyanide antidotes are stored as directed by their manufacturer and replaced on a schedule to ensure that they will be effective when needed.

The auditors observed the Weekly Inspections Checklist for Cyanide Storage, Dosing and First Aid Facilities The inspection includes the checking of the four emergency cabins in the Plant and the first aid equipment at the TSF. The type of antidote kits used has Sodium Nitrite Injection, Sodium Thiosulphate injection and Amyl Nitrite Inhalant. The expiry date is May 2026. The antidote kit is stored in fridges inside the emergency cabinets and at the Sam Jonah Clinic.

Weekly inspection reports include details of whether any spillage has been observed, all emergency showers are functional and alarms are working properly.

The operation has developed specific written emergency response plans and procedures to respond to all types of cyanide exposures including ingestion, inhalation, and absorption through the skin and eyes including the following.

Iduapriem Mine Emergency Response Plan, 4_IDP_Emergency Response Plan-IDP/HSE/ERP/006, Rev. 8, 29 July 2020.

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Operational Procedure - Iduapriem Processing Plant Emergency Response, Emergency Preparedness and Response Plan, EPP 001, Rev. 7, 1 May 2021.

Emergency Preparedness Plan for BTSF – IDP/HSE/PRO/ERP/P/001.

First aid and medical treatment for cyanide reagent exposures, IP-CN-001 Rev 9, 1 May 2025.

The operation has its own on-site capability to provide first aid and medical assistance to workers exposed to cyanide. The on-site capability includes 4 cyanide emergency cabins as well as an emergency trailer at the Plant. There is a dedicated mine wide emergency response team.

The Sam Jonah Mine Clinic is fully equipped to handle cyanide emergencies. A Medical Doctor and Medical Assistant is available on call out 24 hours per day to react to cyanide emergencies. One ambulance is on standby at the Emergency Response Centre to transport emergency patients from the Plant to the Clinic and from the Clinic to the GoldFields Tarkwa Mine Hospital as required. A second standby ambulance is available at the Clinic and equipped for emergencies.

The mine Clinic is equipped to handle up to 3 cyanide patients at one time. The GoldFields Tarkwa Mine Hospital can handle up to 10 cyanide patients and is available as back up. The Clinic has the ability to house patients for observation overnight if necessary. It is further confirmed that the Lancet laboratories located at the Tarkwa Hospital is capable of undertaking cyanide blood analyses.

The Sam Jonah Mine Clinic is fully equipped to handle cyanide emergencies. A Medical Doctor and Medical Assistant is available on call out 24 hours per day to react to cyanide emergencies.

The Clinic has the ability to house patients for observation overnight if necessary. It is further confirmed that the Lancet laboratories located at the Tarkwa Hospital is capable of undertaking cyanide blood analyses.

The on-site capabilities described above include appropriate responses to cyanide exposure through all potential pathways (i.e. ingestion, inhalation, and absorption through the skin and eyes).

The operation has informed the relevant medical facilities of the potential need to treat patients for cyanide exposure, and the operation is assured that the medical facility has adequate, qualified staff, equipment and expertise to respond to cyanide exposures.

The Sam Jonah Mine Clinic is involved in mock drills

The Sam Jonah Clinic has an ongoing Memorandum of Understanding with GoldFields Tarkwa Mine Hospital, which is linked to the GoldFields Tarkwa Mine, an ICMI certified Mine adjacent to Iduapriem Gold Mine.

The Sam Jonah Clinic resident Doctor confirmed that in terms of the Ghana National Medical Protocols, he can call upon Accra based hospitals should he require them. The nearest hospitals with ICU capabilities are at Cape Coast or Accra.

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The Sam Jonah Mine Clinic in terms of the Ghana National Medical Protocols, can call upon Accra based hospitals e.g. Accra Medical Centre Hospital in Tarkwa, should they be required.

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Principle 7 – Emergency Response

Protect Communities and the Environment Through the Development of Emergency Response Strategies and Capabilities.

Standard of practice 7.1: Prepare detailed emergency response plans for potential cyanide releases.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 7.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 7.1; prepare detailed emergency response plans for potential cyanide releases. The operation developed Emergency Response Plans to address potential accidental releases of cyanide and cyanide exposure incidents. These include the following.

The operation has developed specific written emergency response plans and procedures to respond to all types of cyanide exposures including the following:

- *Iduapriem Mine Emergency Preparedness and Response -IDP/HSE/P/011, Version 2, 26 August 2024.*
- *Operational Procedure - Iduapriem Gold Plant , Emergency Preparedness and Response Plan, EPP 001, Rev. 8, 1 May 2025.*
- *Emergency Preparedness Plan for BTSF – IDP/HSE/PRO/ERP/P/001, Rev 1, 9 June 2025.*
- *HSE Management Plan No: IDP/HSE/ERP/MP/006, Version 2, 3 July 2023.*

The Plans consider the potential cyanide failure scenarios appropriate for the operations site-specific environmental and operating circumstances as detailed below.

Iduapriem Gold Plant Emergency Response, Emergency Preparedness and Response Plan includes the following:

- a) Table 8.1, GP Emergency Scenario Response Plan section 3.1 - Catastrophic Release of Hydrogen Cyanide refers to; IP- CN-001 First Aid and Medical Treatment, CN-011 Notification of CN Exposures to Plant Employees, CN-012 Response to CN Spillages or HCN releases, and CN-044 Major Upsets.

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- b) Table 8.1, section 3.2 – Transportation Accidents refers to; IP-CN-001 First Aid and Medical Treatment, CN-012 Response to CN Spillages or HCN releases, CN-022 If Orica (cyanide producer) or Stella Logistics (cyanide transporter) Calls for Assistance, CN-006 Using Canisters with a Full Face Mask.
- c) Table 8.1, section 3.3 – Cyanide Released During Unloading and Mixing refers to; GEP-001 cross references IP-CN-001 First Aid and Medical Treatment, CN-010 Confined Space Entry Procedure, CN-011 Notification of CN Exposures to Plant Employees, CN-012 Response to CN Spillages or HCN releases, CN-037 Maintenance of Cyanide Equipment, CN-035 Cyanide PPE Protection Levels, CN-049 Cyanide Sparging.
- d) Table 8.1, section 2.0 – Fire or Explosion refers to GEP001 CN-001 First Aid and Medical Treatment,
Table 8.1 section 6.1 – Hydrogen Cyanide Gas refers to; IP-CN-001 First Aid and Medical Treatment, IP CN-003 Response to Emergency Conditions, IP CN-032 Response to Abnormal Conditions.
- e) Table 8.1 section 3.5 - Pipe, Valve and Tank Failure refers to; CN-010 Confined Space Entry Procedure, CN-012 Response to CN Spillages or HCN releases.
- f) Table 8.1 section 3.6 – Overtopping of Ponds and Impoundments refers to; IP-CN-45 Decommissioning, ENV003 Procedure for sampling containment dam feed and overflows, ENV004 procedure for environmental sampling, IDP/ENV/P/008 Mine Water Discharge Procedure.
- g) Table 8.1 section 3.8 – Power Outrages and Pump Failures refers to; IP-CN-043 Changing over Cyanide Dosing Pump, CN0-44 Major Upsets, CN-032 Response to Abnormal Conditions.
- h) Table 8.1 section 3.7 – Seepage from Dams/ Ponds/ Blocks refers to; ENV003, ENV004, IDP/ENV/P/008 Mine Water Discharge Procedure.
- i) The Plant does not have cyanide treatment or recovery systems.
- j) Table 8.1 section 3.9 – Failure of Tailings Impoundment/ Wall Failure refers to GEP001 CN-001 First Aid and Medical Treatment, CN-002 Access of an Ambulance, EPP010 Civil Disruption Procedure, EPP011 Earthquake and Seismic Event Procedure.

The planning for responses to transportation-related emergencies has considered the transportation route, physical and chemical form of the cyanide, method of transport (i.e. truck), the condition of the road and the design of the transport vehicle (i.e. sparging tanker).

Transport from Tema to the Orica box to Sparge facility and from the facility to the mine is undertaken by Stellar Logistics a certified transportation company.

Iduapriem Processing Plant Emergency Response, Emergency Preparedness and Response Plan, Version 2, 26 August 2024 includes the following: Table 8.1, section 3.2 – Transportation Accidents refers to; IP-CN-001 First Aid and Medical Treatment, CN-012

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Response to CN Spillages or HCN releases, CN-022 If Orica or Stella Logistics Calls for Assistance, CN-006 Using Canisters with a Full Face Mask.

Stellar Logistics, Route Risk assessment – Tacotel – Barbex Technical Services, Tarkwa, OPS-SOP-008-R1, 5 June 2024.

The assessment is for the road transportation of solid sodium cyanide from Takoradi to Barbex Technical services and from Barbex Technical Services (where the briquettes have been loaded into a sparging tanker) to the entrance of Iduapriem Gold Mine. This assessment is combined with other assessments conducted previously by Orica to cover the entire route from the production facility in Yarwun, Queensland, Australia to the AAIL site as well as previous assessments by Stellar Logistics Limited. The route risk assessment includes route risks, journey management plan, personnel and equipment certification, communication. Emergency contact numbers. Emergency Response Team leaders

Stellar Logistics, Cyanide Transport Management plan, OPS-SOP-001, 8 August 2024.

Stellar Logistics, Emergency Response Plan for the Transportation of Sodium Cyanide, QHSE-SOP-008, 4 March 2025.

The Emergency Response Plans include the following detailed in the relevant sections.

- k) Specific response actions, as appropriate for the anticipated emergency situations, such as clearing site personnel and potentially affected communities from the area of exposure.

Iduapriem Gold Plant Emergency Response, Emergency Preparedness and Response Plan Figure 8.4 Level 1 Emergency Communication Structure – the Managing Director will be responsible for communicating to the External Media. The Senior Manager HSE will be responsible for communicating to the Regulatory Agencies.

Emergency Response plan HSE Management Plan No:IDP/HSE/ERP/MP/006, version 2, 3 July 2023, section 12. Evacuation Plan – which details the procedure for clearing site personnel in case of an emergency.

Procedure for communication with interested and affected parties, IP-CM-048, Rev. 08, 1 May 2025 – communication with affected communities will be done by the Sustainability Department in terms of established procedures and communication avenues. However, due to distance between the mine and the communities, it is unlikely that the communities will have to be evacuated.

- l) Use of cyanide antidotes and first aid measures for cyanide exposure.

Procedure for First Aid and Medical Treatment for Cyanide Reagent Exposures, IP-CM-001, Rev. 8, 1 May 2025. States that the Tripac Cyano Kit and the First Aid and Medical Treatment procedure must accompany the patient to the Sam Jonah Clinic on the mine where a trained medical official will administer the antidote.

- m) Control of releases at their source.

Procedure for Cyanide Spillage, Release of HCN, IP-CN-012, Rev 8, 1 May 2025 – describes the types of possible cyanide spillage or HCN releases and the procedure to follow in the event of such accident occurring including control of releases at their source.

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n) containment, assessment, mitigation and future prevention of releases.

The containment and mitigation of releases is detailed in Procedure for Cyanide Spillage, Release of HCN, IP-CN-012, Rev 8, 1 May 2025.

The Iduapriem Mine, Accident / Incident Management Procedure, IDP/HSE/P/014, Rev 2. 11 March 2025 details how to report, investigate and manage actions associated with incidents and hazards to determine underlying causes in order to eliminate or reduce the potential of future recurrence by identifying and applying adequate control measures.

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Standard of practice 7.2: Involve site personnel and stakeholders in the planning process.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 7.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 7.2; involve site personnel and stakeholders in the planning process.

The operation has involved its workforce and stakeholders, including potentially affected communities, in the cyanide emergency response planning process as detailed below.

Weekly toolbox meeting on the 19 July 2023 Topic: Confined space entry. Details of the topic include monitoring of gases, isolation, and required labelling for such spaces. Attendance sheet was signed.

9 November 2022 Topic: Emergency response procedure incidents within the week. Topic covered included what to do during emergencies and reporting of emergencies. Attendance sheet was signed.

29 January 2025 Topic: Health safety and environmental policy/waste reduction initiatives/lifting and rigging tag colour chart/incidents within the week.

17 September 2025 Topic: Cyanide emergency protocols. Topic discussed include response procedure and evacuation.

The emergency response is included in the cyanide induction training and refresher training conducted annually. Following this the primary strategy is to involve the appropriate workforce and stakeholders in the emergency response plan process through the emergency mock drills where any changes to the currently planning process can be highlighted.

Training is given to communities regarding cyanide awareness, including if any solid cyanide is found for it to be left and for the mine to be called.

During the regular community engagement meetings a presentation is given to the communities regarding cyanide management at the mine which includes the emergency response planning process.

The operation has made potentially affected communities aware of the nature of their risks associated with accidental cyanide releases, and consulted with them directly or through community representatives regarding appropriate communications and response actions.

The Sustainability Department is responsible for communicating with the community including the appropriate emergency responses.

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During the regular community engagement meetings a presentation is given to the communities regarding cyanide management at the mine including the actions to be taken in the event of an accidental release during transportation or from a failure of the TSF, which are the only times a community would be exposed to cyanide.

A TSF embankment failure drill is yet to be undertaken but is being planned and will include the community.

The operation has identified external entities having emergency response roles, and involved those entities in the cyanide emergency response planning process. Operational procedure – *Cyanide Management Plan, EPP 001, Rev 8, 1 May 2025*, Level 1 emergency communication structure provides details of entities involved including the following: Sam Jonah Clinic, Ghana national fire service, national disaster management organisation (NADMO), Ghana police service and Ghana ambulance service.

Sam Jonah Clinic is an on-site mine owned Clinic and is involved in the emergency drills. This was observed in the mock drill reports.

The Sam Jonah Clinic has an ongoing Memorandum of Understanding with GoldFields Tarkwa Mine Hospital, which is linked to the GoldFields Tarkwa Mine, an ICMI certified Mine. Auditors observed an email on the 14 October 2025, from AGA clinic doctor to GoldFields doctor referencing the agreement that exist between the two hospitals in emergency situations.

The Sam Jonah Clinic resident Doctor confirmed that in terms of the Ghana National Medical Protocols, he can call upon Accra based hospitals should he require them. The nearest hospitals with ICU capabilities are at Cape Coast or Accra.

The only external stakeholder involved in emergency responses is the Tarkwa Fire Brigade. The Tarkwa Fire Brigade is involved in the emergency response planning process through their involvement in the emergency drills.

The operation has engaged in consultation or communication with stakeholders to keep the Emergency Response Plan current.

The only external stakeholder involved in emergency responses is the Tarkwa Fire Brigade. The emergency response plans have been sent to the Fire Brigade, in addition they are involved in the mock drills.

Consultation with the communities are through the stakeholder engagement process for the mine.

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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 in substantial compliance with **Standard of Practice 7.3**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 7.3 to designate appropriate personnel and commit necessary equipment and resources for emergency response.

The Emergency Response Plan includes cyanide related elements as detailed below:

- a) Designate primary and alternate emergency response co-ordinators who have explicit authority to commit the resources necessary to implement the Plan.

Iduapriem Gold Plant Emergency Response, Emergency Preparedness and Response Plan, - Section 3 Management Roles and Responsibilities designates primary and alternate emergency response coordinators who have explicit authority to commit the resources necessary to implement the Plan. The Members of the Emergency Response Teams are identified on notice boards. The Plant Emergency Response Team (ERT) wear green hard hats for identification purposes.

HSE Management Plan No: IDP/HSE/ERP/006, Section 9, states that 'The incident commander has the authority (which includes securing equipment and personnel as required), to effectively control the emergency situation on hand'.

- b) Require appropriate training for emergency responders.

The Emergency Response Coordinators and members of the Emergency Response Team are trained in the procedures included in the emergency response plans regarding cyanide, including the use of necessary response equipment. This is stated in IP CN-003 Response to Emergency Conditions.

Advanced Cyanide first aid training, which included handling spills, decontamination and the mechanism of cyanide poisoning, was undertaken on 8 November 2024 at the Iduapriem Club House.

- c) Include call-out procedures and 24-hour contact information for the co-ordinators and response team members

Figure 8.3 details the Emergency Communication Structure, Figure 8.4 details Level 1 Emergency Communication Structure. 24 hour contact information is detailed in Appendix A Section 11.1.

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- d) Specify the duties and responsibilities of the co-ordinators and team members.

Section 3 Management Roles and Responsibilities specifies duties and responsibilities of the coordinators and team members specifies the duties and responsibilities of the co-ordinators and team members.

- e) List emergency response equipment, including personal protection gear, available on-site.

Appendix D lists emergency response equipment including personal protection gear, available on-site.

- f) Include procedures to inspect emergency response equipment to ensure its availability.

Weekly Inspection Checklists for cyanide storage, dosing and first aid facilities, includes Cyanide Sparging Facility, cyanide emergency cabins, cyanide delivery pipes and valve, cyanide management station and trailer, bund integrity inspection, emergency response trailer equipment inventory, emergency response cabinet equipment inventory, and deviations report (deviations, action plan, person responsible, expected completion date, remarks).

- g) Describe the role of external responders, medical facilities and communities in the emergency response procedures

Section 3 Management Roles and Responsibilities describes the role of external responders. The medical facility is the mine clinic adjacent to the Plant, which is part of the full chain mock drills. The Tarkwa Fire Brigade is the only external responder and is included in mock drills.

The local communities and local town emergency response services with the exception of the Tarkwa Fire Brigade do not have designated responsibilities in the Mine Emergency Response Plan due to their distance from the Mine except when communities are affected such as in the event of a TSF failure.

The emergency response plans have been sent to the Tarkwa Fire Brigade.

Mock emergency drills within the mine are conducted every 4 months to test response procedures for various exposure scenarios. The operation confirmed that external entities with roles and responsibilities identified in the emergency response plans are aware of their involvement and are included as necessary in mock drills or implementation exercises.

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Standard of practice 7.4: Develop procedure for internal and external emergency notification and reporting.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 7.4**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 7.4 to develop procedures for internal and external emergency notification and reporting.

The emergency response plans include procedures and contact information for notifying management, regulatory agencies, external response providers and medical facilities of the cyanide emergency.

Iduapriem Gold Plant Emergency Response, Emergency Preparedness and Response Plan Section 8.3: Emergency Communication Structure details the process for communication. Section 11.1 Emergency Contacts provide the contact information in case of emergency.

The emergency response plans include procedures and contact information for notifying potentially affected communities of the cyanide related incident and any necessary response measures and for communication with the media.

Communications to communities are undertaken under the approval of the Managing Director as stated in *Procedure to follow for cyanide management when major upsets occur, IP-CN-044, Rev. 8, 1 May 2025*. The Managing Director will then direct the sustainability department to contact the relevant communities through their chiefs.

The Managing Director will contact the media directly.

The Senior Manager HSE is responsible for communicating with the Regulatory Agencies as detailed in *Iduapriem Processing Plant Emergency Response, Emergency Preparedness and Response Plan, EPP 001, Rev. 8, 1 May 2025* Figure 8.4 Level 1 Emergency Communication Structure.

The operation has a procedure for notifying the ICMI of any significant cyanide incidents, as defined in the ICMI's Definitions and Acronyms document.

IP-CN-051 Procedure for Notifying ICMI of a Cyanide Incident, 1 May 2025, details that all significant cyanide incidents should be reported to the International Cyanide Management Institute (ICMI) within 24 hours of an occurrence through the Senior Manager Processing and the Managing Director.

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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 in substantial compliance with **Standard of Practice 7.5**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 7.5 to incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

The spill procedures referred to in the emergency response plans describe specific remediation measures as appropriate for the likely cyanide release scenarios as detailed below.

a) Recovery or neutralisation of solutions or solids.

Procedure for Cyanide Spillage, Release of HCN and Communication with Corporate Offices, IP-CN-012, Rev 8, 1 May 2025 - neutralisation of solutions will be undertaken using hydrogen peroxide. Section 6 Procedure, Detoxification of cyanide waste/ spillage states that the hydrogen peroxide is stored in front of the cyanide plant beside the emergency cabinet.

b) Decontamination of soils or other contaminated media.

Procedure for Cyanide Spillage, Release of HCN and Communication with Corporate Offices, IP-CN-012, Rev 8, 1 May 2025 - neutralisation of solutions will be undertaken using 15% hydrogen peroxide. This is used until free cyanide is below titration level of 0.5 mg/l.

c) Management and/or disposal of spill clean-up debris.

The material is taken to a suitable disposal site as determined through a risk assessment, or otherwise returned to the leach circuit.

d) Provision of an alternate drinking water supply.

There is no scenario where surface drinking water would be contaminated as drinking water is not derived from surface water. The mine has groundwater boreholes within the mine site that are used as sources of drinking water. The water quality for these bores are tested periodically by the mine and so any contamination of groundwater would be detected and addressed by the water quality analysis before it affects groundwater drinking sources outside the mine. However, provision is made for an alternative water supply in *Procedure for Cyanide Spillage, Release of HCN and Communication with Corporate Offices, IP-CN-012, Rev 8, 1 May 2025*.

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The emergency response plans prohibit the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water or that has the potential to reach surface water.

The Iduapriem Gold Plant Emergency Response, Emergency Preparedness and Response Plan Section 5.1.4 states that "the use of Sodium Hypochlorite, Ferrous Sulphate and Hydrogen Peroxide is prohibited in treating spills that has entered surface water bodies."

The 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 Iduapriem Gold Plant Emergency Response, Emergency Preparedness and Response Plan states that the monitoring locations will be identified through a risk assessment process.

Auditors observed the environmental monitoring map for surface waters and ground water monitoring which can be used to identify the extent and effects of cyanide release.

The sampling of surface or groundwater would be undertaken in accordance with the monitoring procedures detailed in 4.9.1. Soil sampling will be undertaken in accordance with *Procedure for Cyanide Spillage, Release of HCN and Communication with Corporate Offices, IP-CN-012, Rev 8, 1 May 2025*.

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Standard of Practice 7.6: Periodically evaluate response procedures and capabilities and revise them as needed.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 7.6**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 7.6; to periodically evaluate response procedures and capabilities and revise them as needed.

The operation reviews and evaluates the cyanide-related elements of its emergency response plans for adequacy on a regular basis.

Iduapriem Gold Plant Emergency Response, Emergency Preparedness and Response Plan Section 4.6 details when changes to the document will be made including the following:

- Regulatory changes;
- New risk identified;
- Resources or organisational changes;
- After drills, when changes have been identified;
- After an actual event;
- Budget changes;
- Technology changes; and
- Major changes.

The Mine Emergency and Preparedness Procedure Section 3.13.2 states “ the emergency response manual shall be reviewed as and when necessary, after an incident requiring the emergency response plan to be implemented”.

The *HSE Management Plan No: IDP/HSE/ERP/MP/006, version 2*, section 2.1 states “Review and maintain the emergency preparedness and response procedures to ensure the procedures remain current and applicable to all hazards and risks”.

Section 15 states that ‘periodically review and revise the processes and planned response actions, in particular after the occurrence of emergence situations or tests’.

The emergency response plans are controlled documents which are reviewed every two years.

Mock cyanide emergency drills are conducted periodically

A drill schedule is created at the start of the year. The auditors observed the schedule for the year 2025 which showed a mock drill planned for every quarter. The schedule included a drill for TSF embankment failure, drowning at the BTSF and a cyanide burst pipe. The TSF

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embankment failure drill is yet to be undertaken and this is planned to include the community.

The drills undertaken since the previous recertification audit were not tabletop exercises and involved all of the personnel that may be expected to respond to the type of cyanide incident simulated. The operation also evaluated the cyanide emergency drills conducted during this ICMC recertification period to determine the adequacy of the operation's response plans and training programs, which were found to be adequate.

Provisions are in place to evaluate and revise the Emergency Response Plan after any cyanide related emergency requiring its implementation. There have been no cyanide related emergencies requiring the implementation of the Emergency Response Plan.

The 2025 BTSF incident was a seepage from the wall of the TSF that gave rise to an emergency response as detailed in the Emergency Response Plan. This type of incident, seepage from TSF, was included in the Emergency Response Plan prior to the incident. Review of the Emergency Response was undertaken as part of the incident investigation and no change to the Emergency Response Plan was deemed necessary.

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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 understand the hazards associated with cyanide use.

in full compliance with
The operation is in substantial compliance with Standard of Practice 8.1
 not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 8.1; train workers to understand the hazards associated with cyanide use.

The operation trains all personnel who may encounter cyanide in cyanide hazard recognition.

Induction

Induction training for the mine as a whole includes basic cyanide awareness. Plant specific inductions also include a more detailed cyanide awareness. Induction training is refreshed annually.

Auditors observed the file of training records for general induction training for all staff and visitors which includes general information on cyanide.

The training form includes induction on the following:

- HSE policy;
- Legal and other requirements;
- Accident/incident prevention basics and management;
- ISO 45001 and ISO 14001 management systems;
- Management and employees' responsibilities in terms of HSE;
- Emergency procedures and basic first aid;
- HSE permits and tagging;
- General safety information-safety rules on site;
- Industrial hygiene;
- Fatigue management (fitness for work-alcohol and drugs policy);
- Fire prevention and use of portable fire extinguisher;

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- Community complaints and grievance management;
- Environmental awareness;
- Waste management;
- Major hazard control standards; and
- Employee assistance programme.

Cyanide awareness training

There is also a separate Cyanide Awareness Training Module for new employees, with refresher training conducted every 2 years.

Iduapriem Process Plant Cyanide Induction Handbook Presentation that is used for induction of personnel visiting the Processing plant.

The training covers the following:

- What is cyanide;
- Hazards, reviews and evaluations;
- Personal protective equipment;
- Symptoms of cyanide poisoning;
- Cyanide first aid procedures;
- Cyanide storage and handling (Cyanide Plant);
- Cyanide gas monitors;
- Cyanide hot spot;
- Cyanide incident and management (included in the environmental emergency plan);
- International cyanide management institute;
- Summary/Discussion/Questions; and
- Quiz.

This training adequately addresses cyanide hazards, such as the cyanide materials present at the operation, the health effects of cyanide, and the symptoms of cyanide exposure.

Advanced cyanide training

Advanced Cyanide first aid training, which included handling spills, decontamination and the mechanism of cyanide poisoning, is undertaken every 2 years.

Training matrix

New-Mine-Wide HRD Matrix per training attendance. The matrix includes all employees per Department. Lists the training required for each employee, including Cyanide Awareness and Basic Emergency Response, including the ERT team.

Training matrix for the processing department in 2025 which shows the list of the personnel, the programmes to be trained on and status of the training for personnel. Cyanide

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awareness and basic emergency response was included as a programme in the training matrix.

The inductions for the mine and the Plant, which included cyanide awareness are refreshed on an annual basis.

The specific Cyanide Awareness Training Module is refreshed every 2 years.

Training records are retained for five years, after which they are archived. They only stop being retained 5 years after someone has stopped being employed by AAIL.

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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 in substantial compliance with **Standard of Practice 8.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation 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.

The operation trains workers to perform their normal production tasks, including unloading, mixing, production and maintenance, with minimum risk to worker health and safety in a manner that prevents unplanned cyanide releases?

Employees are trained prior to working in the process plant, refresher training will be provided when the Supervisor deems it necessary or if an incident has occurred.

Form no: IDP/HSE/F/039, version 2, SOP training acknowledgement form is used to record the competency of the individual following training.

Matrix

It was observed that the training matrix identifies the operational related training required by each employee to perform their normal production tasks, e.g. processing plant operational overview, basic metallurgy, grinding mills circuit operations training, Gravity & ILR circuit operations, leach-CIL circuit operations, TSF operations training, and confined space entry and rescue (buddy system).

Cyanide awareness and basic emergency response are included in the training matrix. After training, Planned Job Observations (PJOs) are used in determining if someone is competent to undertake a specific task following training.

The training elements necessary for each job involving cyanide management are identified in the SOPs that are used as part of the training materials. Task training related to cyanide management activities is provided by an appropriately qualified person. The section supervisor undertakes the training for personnel about to undertake a task with the supervisor being experienced in the tasks required.

Workers are trained prior to working with cyanide

Employees work under supervision until they have received all the section specific training. Thereafter they can work unsupervised.

Refresher training on cyanide management is provided to ensure that employees continue to perform their jobs in a safe and environmentally protective manner.

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Mine and Plant induction training is refreshed annually. Normal cyanide awareness training is done annually. Advanced Cyanide Awareness Training Module is refreshed every two years.

Task specific refresher training will be presented when the Supervisor deems it necessary or if an incident has occurred. The interval by which the supervisor must arrange for task-specific training is determined on a case by case basis depending on the availability of the required personnel and the criticality of the task. The auditors observed task specific training for Authorised gas detector training on the 18th and 19th September 2024.

The operation evaluates the effectiveness of cyanide training by testing and observation. The general induction training that is verbally tested. Cyanide awareness training has a written test with pass mark of 70%. Training on the SOPs is verbally assessed.

PJOs are undertaken by the respective supervisors. The PJOs are scheduled for each supervisor who will then conduct the PJO on one of the employees working under their supervision.

Records are retained throughout an individual's employment documenting the training they have received and 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.

- Training records are kept for 5 years on site after which time they are archived but still retained for an additional 5 years.
- Plant processing induction includes all the topics with a pass mark of 70% for assessment.
- PJOs are undertaken for individual tasks with the supervisor making the assessment for the individual.

Various training records were observed by the auditors as detailed above.

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Standard of practice 8.3: Train appropriate workers and personnel to respond to worker exposure and environmental releases of cyanide.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 8.3**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation 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.

All cyanide unloading, mixing, production and maintenance personnel are trained in the procedures to be followed if cyanide is released, including Decontamination and First Aid.

This training is included in the Cyanide Awareness Training Module which is provided to all new employees of the Plant, the TSF and the ERT.

AngloGold Ashanti, Cyanide Awareness Induction training:

- What is cyanide;
- Hazards, reviews and evaluations;
- Personal protective equipment;
- Symptoms of cyanide poisoning;
- Cyanide first aid procedures;
- Cyanide storage and handling (Cyanide Plant);
- Cyanide gas monitors;
- Cyanide hot spot;
- Cyanide incident and management (included in the environmental emergency plan);
- International cyanide management institute;
- Summary/Discussion/Questions; and
- Quiz.

The staff also undertake first aid certification training with St Johns Ambulance.

The Emergency Response Coordinators and members of the Emergency Response Team are trained in the procedures included in the emergency response plans regarding cyanide, including the use of necessary response equipment.

Auditors observed the Planned Training Activities for ERT which includes:

- Ambulance Operations
- Rescue from Heights

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- Basic and Advanced Fire Fighting
- Airways Management
- Cyanide First Aid Treatment and Drill
- Hazmat Incidence Response
- Medical Patient Assessment
- Spinal Immobilisation
- Donning and Doffing SCBA
- Emergency communication (includes emergency response plan).
- Lifting and Moving Patients
- Managing Wounds, Burns and Fractures
- Oxygen Therapy
- Advanced First Aid Treatment

The operation has made external responders, such as local fire brigades familiar with those elements of the emergency response plans related to cyanide. The only external responder is the Tarkwa Fire Brigade. The operation has provided them with a copy of the Mine Emergency Response Plan. The Fire Brigade has been included in mock drills.

Refresher training for response to cyanide exposures and releases is conducted regularly.

Induction training for the mine as a whole includes basic cyanide awareness and is undertaken on an annual basis. Plant specific inductions also include a more detailed cyanide awareness and is refreshed annually.

There is also a separate Cyanide Awareness Training Module for new employees, with refresher training conducted every 2 years, which includes response to cyanide exposures and releases.

Records are retained throughout an individual's employment documenting the training they have received and 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.

- Training records are kept for 5 years on site after which time they are archived but still retained for an additional 5 years.
- Plant processing induction includes all the topics with a pass mark of 70% for assessment.
- PJOs are undertaken for individual tasks with the supervisor making the assessment for the individual.

Various training records were observed by the auditors as detailed above.

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Principle 9 – Dialogue and Disclosure

Engage in Public Consultation and Disclosure.

Standard of practice 9.1: Promote dialogue with stakeholders regarding cyanide management and responsibility address identified concerns.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 9.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 9.1; provide stakeholders with the opportunity to communicate issues of concern.

The operation provides stakeholder with information on its cyanide management practices and engages with them regarding their concerns.

There are 16 host communities around the mine.

A Community Consultative Committee Meeting is held on a quarterly basis. The auditors observed a report on Community Engagement Sessions on Cyanide Transportation, March 7 to March 18 2025. The meetings were attended by the Community Consultative Committee members from each the surrounding communities. The auditors observed the attendance register, 27 March 2025 on Community Consultative Committee meeting at Akyempim on cyanide education, AAIL interventions, and community safety.

Community dialogue presentation in 2024 for Akyempim Community on general cyanide awareness.

Community engagement 2025 for cyanide transportation.

A community disclosure report on 20 October 2023 on environmental monitoring disclosure.

Report on Community engagement sessions on environmental monitoring disclosure, held between 17 September to 19 November 2024 for about 10 communities including Nkyemia, Adieyie, Badukrom, Timber Road and Mile 7.

Report on Community engagement sessions on cyanide education, held between 7 March to 18 March 2025. In attendance were the communities and the Community Consultative Committee members. The objective of the session was to educate host community leadership on the transportation of cyanide, raise awareness of its hazards and strengthen preparedness and emergency response among communities within the Mine's catchment area. This was done after the BTSF seepage incident. About 14 communities were visited

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including Charliekrom, Bankyim, Mile 7 and New Domeabra. The attendance sheet and photos for the cyanide education was observed for each community.

In addition, an emergency preparedness initiative campaign was raised to prepare communities on emergency preparedness.

Engagement with regulators

In addition, there is a structured meeting with all stakeholders such as the EPA, and Mincom for Environmental disclosure The last one was held in 2024.

The Community Safety Management Plan, IDP/SUS/CSMP/001, version No:1, 1 August 2024 covers environmental, safety and social aspects.

Sustainability Strategy, IDP/SUS/CSE/003, Version No:1, 1 August 2024, Version 3,

Stakeholder Engagement Plan, 1 August 2024, which has details on the various communities or stakeholders that need to be engaged and the issues to be discussed.

For the BTSF release incident that occurred on the 17 February 2025 a stakeholder engagement plan for BTSF crisis management was developed. The Plan shows the stakeholders that were identified and involved in the engagement process and included local communities, local government and regulators.

The Plan also covers the communication message to be communicated to each target audience, and the necessary actions and the date of completion for the actions to be implemented.

The stakeholder engagement plan for 2025. The engagement plan shows the list of identified stakeholders (includes security agencies, government relations, community youth groups, host community leaders, religious leaders and traditional councils), engagement priorities for 2025, key message to each stakeholder, communication method and start and completion date for each message.

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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 in substantial compliance with **Standard of Practice 9.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 9.2 to make appropriate operational and environmental information regarding cyanide available to stakeholders.

The operation has developed written descriptions of how their activities are conducted and how cyanide is managed. These descriptions are available to communities and other stakeholders.

During the community engagement meetings, a presentation is given to the communities regarding cyanide management at the mine. This is also disseminated to the communities as a hard copy as observed by the auditors.

The operation has disseminated information on cyanide in verbal form where a significant percentage of the local population is illiterate. The presentations given at the meetings were given verbally in the local language of Twi to allow for any persons who are illiterate.

The operation makes information publicly available on confirmed cyanide release or exposure incidents including the following.

- Cyanide exposure resulting in hospitalisation or fatality.
- Cyanide releases off the mine site requiring response or remediation.
- Cyanide releases on or off the mine site resulting in significant adverse effects to health or the environment.
- Cyanide releases on or off the mine site requiring reporting under applicable regulations.
- Releases that are or that cause applicable limits for cyanide to be exceeded.

The operation makes information publicly available on confirmed cyanide releases or exposure incidents.

Confirmed cyanide incidents will be communicated to the affected communities, via the quarterly community engagement sessions / reports. They will also be communicated to the Ghanaian EPA and the Minerals Commission in writing.

The operation demonstrated to the auditors that there is a Ghanaian Chamber of Mines WhatsApp group, where information regarding incidents reported to the Chamber of Mines is disseminated.

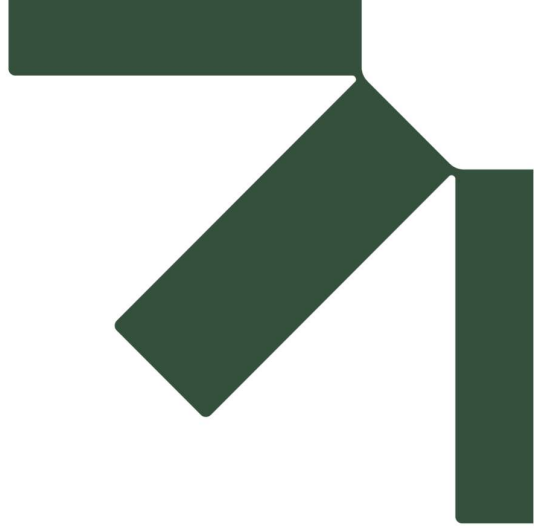
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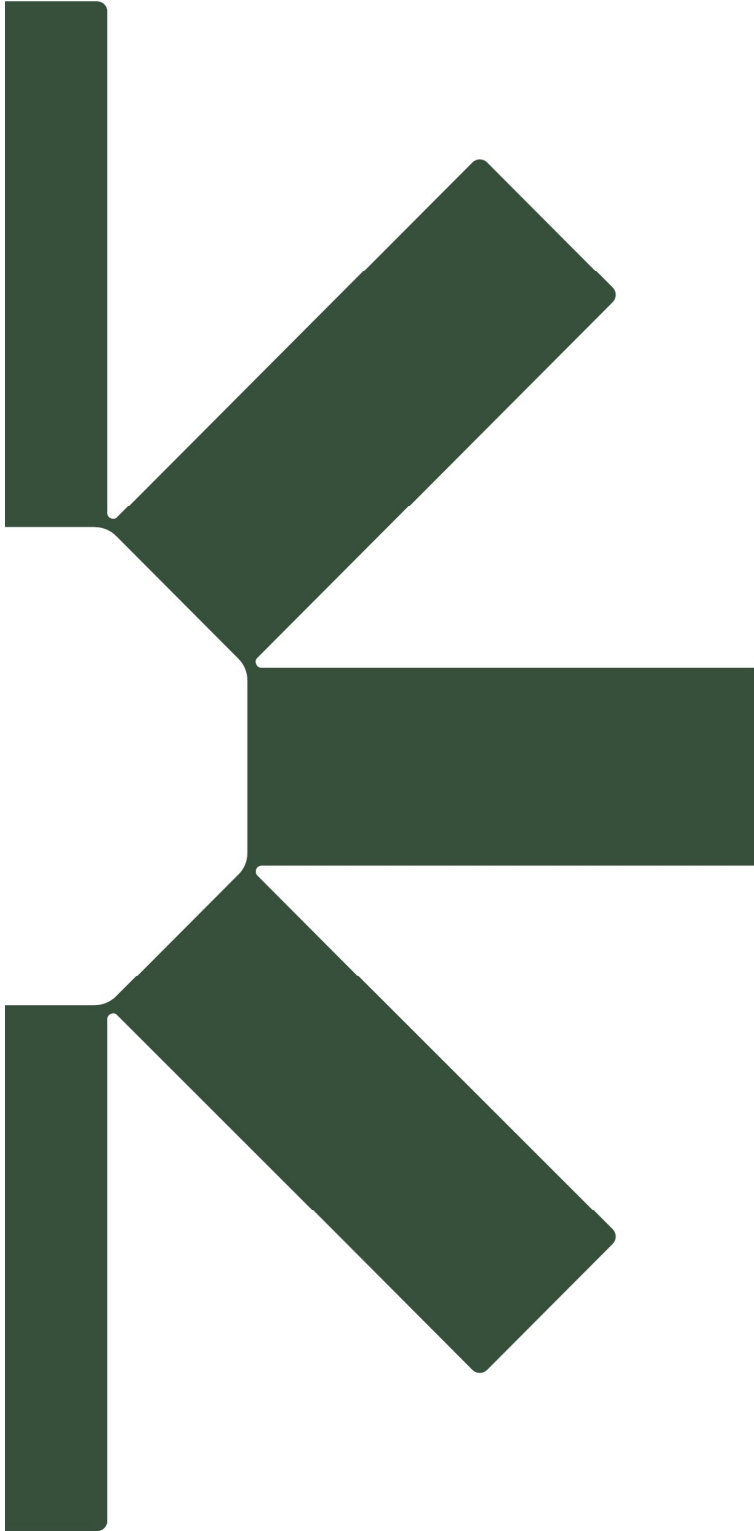


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