

CORRECTIVE ACTION PLAN

Barrick Bulyanhulu Gold Plant

Introduction

One of the components of the auditing of the ICMI Cyanide Code is the development of a Corrective Action Plan for those parts of the audit findings that have been found to be in substantial compliance and require focused responses to take the site to full compliance.

ICMI requirements indicate that Corrective Action Plans and notification thereof must be completed within 12 months of posting of the Plan on the ICMI website.

The section below details the corrective actions, agreed by the Bulyanhulu Gold Plant and the Lead Auditor, necessary to bring the Plant into full compliance, as indicated in the Detailed Audit Report.

Corrective Action Plan - 1

Principle 4 – Operations. Manage cyanide process solutions and waste streams to protect human health and the environment.

Operations Practice 4.8 Implement Quality Control/Quality Assurance (QA/QC) procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

Deficiencies

The Gekko Plant Structural Audit Report, 2025, dated September 2025, prepared by Resultant Consulting Engineers, was prepared because QA/QC records from the construction of the Plant could not be found and there were no as-built drawings available. The Audit report identified several deficiencies stemming from the construction of the new Gekko Plant. The deficiencies were: -

- A missing support plinth on N6,
- missing grout pads beneath the base plates of the Gekko System supports,
- several bracing members had been removed on the surrounding superstructure, and
- design non-conforming cut-outs were made on support beams.

Corrective Actions

The Report recommends: -

- a) A plinth beneath the N6 column should be installed as soon as possible.
- b) That the missing grout pads be reinstated within 12 months.
- c) The removed bracing members be reinstated within the next 12 months.

d) That support beams with cutouts be reinstated to the original design specifications.

Evidence for Auditors

Evidence required by the auditor to confirm the corrective actions have been implemented effectively: -

- Photographic evidence of a plinth being installed beneath the N6 column.
- Photographic evidence that the missing grout pads have been installed.
- Photographic evidence that the removed bracing members be reinstated.
- Photographic evidence that the support beams with cutouts have been reinstated to the original design specifications.
- Sight of revised “as-built” drawings showing structures in place as per original design requirements.
- If an appointed Structural Engineer has investigated and recommended alternate solutions, as optioned in the Gekko Plant Audit Report, and these have been implemented, there should be motivation of the alternatives and drawings showing that the latter alternatives satisfy the deficiencies identified in the Audit Report.

Corrective Action Plan – 2

Principle 5 - Decommissioning. Protect communities and the environment from cyanide through development and implementation of decommissioning plans for cyanide facilities.

Decommissioning Practice 5.2 Establish a financial assurance mechanism capable of fully funding cyanide-related decommissioning activities.

Deficiencies

- As the mechanism to pay the Rehabilitation Bond annually has to be renegotiated with the Tanzanian Government every year, there is no fallback solution to guarantee Closure Cost financing whilst annual negotiations are underway. Thus, there may be periods when funding is potentially unavailable or not guaranteed.
- Historically, there needs to be clarity from Barrick Corporate that, if the Closure Plan would have been required to be initiated during 2023, 2024, and 2025, the parent company would have funded the Plan, in the absence of Rehabilitation Bonds to fund it. Otherwise, historically, there was no guarantee for funding for the Closure Plan over the past three years since the last recertification audit.

Corrective Actions

- As the mechanism to pay the Rehabilitation Bond annually has to be renegotiated with the Tanzanian Government every year, there needs to be a fallback solution to guarantee Closure Cost financing (including the

cyanide decontamination and decommissioning) whilst annual negotiations are underway.

- There needs to be written confirmation from Barrick Corporate that, in the absence of all the Guarantee premium payments since the last ICMI recertification audit, if Bulyanhulu had had to initiate their Closure Plan for abnormal or emergency reasons, Barrick Corporate would have underwritten the costs of the Closure Plan (including the cyanide decontamination and decommissioning) that may have occurred.

Auditor Evidence

- A signed letter or document detailing a fallback solution to guarantee Closure Cost financing whilst annual negotiations on the Rehabilitation Bond funding are underway.
- Written and signed confirmation from Barrick Corporate that, in the absence of all the Guarantee premium payments since the last ICMI recertification audit, if Bulyanhulu had had to initiate their Closure Plan for abnormal or emergency reasons, Barrick would have underwritten the costs of the Closure Plan (including the cyanide decontamination and decommissioning) that may have occurred.

Completion Date: 12 months from the date of publication of the recertification audit result on the ICMI website.



Arend Hoogervorst
Lead Auditor

31st MARCH 2026

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