

***INTERNATIONAL CYANIDE
MANAGEMENT INSTITUTE***

***Cyanide Code Compliance Audit
Gold Mining Operations***

Summary Audit Report

***Barrick Gold Corporation and
State of Mali Joint Venture
Company
Loulo Gold Plant
Mali***

3rd – 8th October 2025

***For the
International Cyanide Management Institute
Cyanide Code***



Name of Operation: Loulo-Gouunkoto Processing Plant

Name of Operation Owner: Barrick Corporation (80%), Republic of Mali (20%)
Joint Venture Company

Name of Operation Operator: SOMILO SA

Name of Responsible Manager: Mr Ibrahima Siby, Process Manager

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Location Detail and Description of Operation

Located in Western Mali, adjacent to the Faleme River, which forms the border with Senegal, the Loulo mine was commissioned in 2005. The mine has an LoM (Life of Mine) to 2041 (another 16 years). The Complex is an operating mine site comprising two underground mines (Yalea and Gara) and a processing plant (5 million tonnes per annum (Mtpa) capacity) producing gold doré bars at Loulo, with a third underground mine and open pit operation at Gouunkoto, in addition to a number of satellite deposits, together with other associated mine operation and regional exploration Infrastructure. The Mill throughput is 420,000 tons per month (tpm), or 5 million tons per year (Mtpy). Tailings is split between the Tailings Storage Facility (TSF) and the paste plant (backfill). TSF deposition is 280,000 tpm, and the TSF is located 4.5 km east of the gold plant.

The Loulo processing plant uses a carbon-in-leach (CIL) gold extraction process with a throughput capacity of 5.0 Mtpa. The Loulo process plant processes ore from both Loulo and Gouunkoto operations.



PRIMARY CRUSHER

Secondary Crushing

Tertiary Crushing

HPGR For Scats

SOFT ORE

Mineral Sizer

Regrind Mills Stockpile

Primary Mill Stockpile

Conveyor

Cyclones

Primary Mill

Ball Mills

Ball Mills

CIL Tank Farm

KILN

Elution

Smelt-house

Gravity concentrate

Eluate

Gold Bullion

Thickener and Clarifier

TAILINGS DISPOSAL DAM

8km Upgraded pipeline

Yalea and Gara Paste Plant

Accounting Sampling points

1. Crushing and Milling

2. CIL and Elution

3. Gold Recovery and Elution

Loaded Carbon is screened from the CIL tank and treated in a Zadra Elution circuit for gold recovery from carbon. The loaded carbon is chemically regenerated by hydrochloric acid before being sent to the elution columns, where gold is eluted into solution. The gold solution is pumped to the electrowinning section where gold is recovered from the

solution and smelted to produce Gold Doré, which is sent to the refinery for production of fine gold for the gold market.

4. Intermediate Plant

The CIL tails are pumped to the Intermediate plant, where backfill material for use in the underground shafts is produced. The intermediate plant is equipped with a peroxide cyanide destruction facility, reducing WAD (Weak Acid Dissociable) cyanide to:-

- Tailings Storage Facility: less than 50 mg/l WAD cyanide
- Underground Backfill tanks: less than 0.5 mg/l WAD cyanide

The intermediate plant is equipped with an on-line Cynoprobe WAD and Free cyanide analyser to control the detoxification process and measure the WAD cyanide in the tailings slurry and the backfill feed to the shafts.

5. Tailings disposal

The tailings from the Intermediate Plant are pumped via a 4.5 km pipeline to the paddock Tailings Storage Facility (TSF). The solution is decanted into a Return Water Dam, from which it is recycled to the process plant for reuse.

Acronyms and Abbreviations used in this Report

CIL – Carbon-In-Leach
CIP – Carbon-In-Pulp
CPR - Cardiopulmonary Resuscitation
Dw – Drawing
ERP – Emergency Response Plan
ERT – Emergency Response Team
GA – General Arrangement
GISTM – Global Industry Standard on Tailings Management
HAZCHEM - (derived from "hazardous chemicals") is a warning plate system used on vehicles and storage facilities to identify dangerous goods
HCN – Hydrogen Cyanide
HDPE – High-Density Polyethylene
ICMC – International Cyanide Management Code
ICMI – International Cyanide Management Institute
ICOLD – International Commission on Large Dams
KPIs – Key Performance Indicators
MDM - Metallurgical Design and Management Pty Ltd, an engineering design company that designs Gold Mine Processing Plants.
Mg/L – Milligrams per litre
MINTEK - Quasi-governmental organisation in South Africa providing accredited laboratory testing, equipment supply, and consulting services on cyanide and cyanide speciation
MMS - Monthly Monitoring System
MOU – Memorandum of Understanding
NaCN – Sodium Cyanide
PCD – Pollution Control Dam
pH - relates to hydrogen ion concentration using a scale of 0 (highly acidic) to 14 (highly alkaline)



P&ID – Piping and Instrumentation Drawing

PMS – Planned Maintenance System

PPE – Personal Protective Equipment

ppm – Parts per Million

PTO – Planned Task Observation

SAP – proprietary name. SAP is a German multinational software company, a global leader in enterprise resource planning (ERP) software. SAP stands for *Systemanalyse Programmentwicklung* in German.

SCADA - **S**upervisory **C**ontrol **A**nd **D**ata **A**cquisition display – Computerised Control Equipment

SDS – Safety Data Sheet

SIMM Report - **S**tructural **I**ntegrity **M**anagement **M**onitoring Report – corporate risk monitoring system for plant structures.

SOP – Standard Operating Procedure

SWD – Stormwater Dam

SWP – Safe Work Procedure

TSF – Tailings Storage Facility

TUF – Thickener Underflow

WAD – Weak Acid Dissociable

WIBC – Wooden Intermediate Bulk Container



Auditor's Finding

This operation is

☐ in full compliance

X in substantial compliance *(see below)

☐ not in compliance

with the International Cyanide Management Code.

This operation has experienced compliance issues during the previous three-year audit cycle which are discussed in this report under Standards of Practice 4.4, 4.8, and 5.2.

Audit Company: Eagle Environmental

Audit Team Leader: Arend Hoogervorst
& Mine Technical Auditor

E-mail: arend@eagleenv.co.za

Dates of Audit: 3rd – 8th October 2025

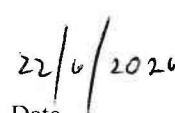
I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for 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 Verification Protocol for Mine Operations and using standard and accepted practices for health, safety and environmental audits.

Barrick Lolo Gold Plant

Facility


Signature of Lead Auditor


Date

Loulo Gold Plant


Signature of Lead Auditor

22nd June 2026

Auditor's Findings

Principle 1. PRODUCTION AND PURCHASE:

Encourage responsible cyanide manufacturing by purchasing from manufacturers who 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.

X in full compliance with

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

☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

Loulo Gold Mine purchases its solid sodium cyanide briquettes from Hebei Chengxin Company Limited, China (Hebei Chengxin). Hebei Chengxin was recertified by ICMI as a cyanide production facility on 18 April 2023.

In the sighted Supply and Purchase Agreement for Sodium Cyanide to Loulo Gold Mine between Société Des Mines De Loulo SA, Hebei Chengxin Company Limited and Afrilog South Africa (Pty) Limited, it states that Loulo will, "...Purchase only or supply cyanide sourced from production facilities that are certified as ICMI compliant from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide and prevent releases of cyanide to the environment..."

Afrilog is a logistics company that has no direct contact or product stewardship role with the sodium cyanide purchased and therefore does not need to be certified in the Cyanide Supply Chain.

Principle 2. TRANSPORTATION:

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.

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.

X in full compliance with

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



☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

Two full sets of supply chain documents for a delivery, from the order to the delivery note to the Loulo gold plant, were sampled and sighted for deliveries in 2023 and 2025. All identified components of the full supply chain and the Hebei Chengxin Land and Ocean Supply Chain were identified and confirmed. The land transport using CSTT-AO from the port of Dakar to site was confirmed. Hebei Chengxin Transport Co., Ltd was ICMI-certified on 18 April 2023, Hebei Chengxin Transport Global Ocean Supply Chain was ICMI-certified on 30 October 2023, and CSTT-AO was ICMI-certified as a transporter from 6 February 2025.

Principle 3. HANDLING AND STORAGE:

Protect workers and the environment during cyanide 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.

X in full compliance with

The operation is

☐ in substantial compliance with **Standard of Practice 3.1**

☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

No change from previous audit evidence sighted in the following design files:

1. Cyanide mixing and storage tanks: DRG 0611-PW-7001, rev 2, cyanide mixing tank 70-100TNK-02 DRG 0611-PW-7002, rev 2, Cyanide storage tank volume 62 m³, bund 69 m³.
2. Cyanide P&ID (Piping and Instrumentation Drawing): Cyanide Piping and Instrumentation DWG No. 0611-PD70110, rev 2, dated 13/4/2005, by MDM for Randgold Resources.
3. The table, "Types de valves placées sur les lignes du cyanure", was sighted, including cyanide valve specifications.

It was concluded that the cyanide mixing and dosing facilities were designed by Metallurgical Design and Management Pty Ltd (MDM), an Engineering design company using their standard engineering practices for cyanide reagent strength facilities.

During the site inspection, it was confirmed that the cyanide shed, cyanide mixing area, and cyanide dosing tank area are located away from people and surface waters, are separate, and are not adjacent to any incompatible materials. The solid cyanide store is dedicated solely to solid sodium cyanide storage.

Only solid cyanide is used, and it is mixed within a bunded concrete area designed to contain any leakage (confirmed during the site inspection). Marine containers containing 20 x 1 ton, WIBCs



(Wooden Intermediate Bulk Containers) of sodium cyanide briquettes are unloaded on concrete bases, adjoining the warehouse.

During the site inspection, it was confirmed that the cyanide mixing and dosing tanks are equipped with level sensors. The tank level indications on the SCADA (Supervisory Control And Data Acquisition) display system in the control room were confirmed during the site inspection. It was reported that the cyanide mixing automatic tank water valve is opened by the SCADA system at 10% volume and automatically closed at 80%. Level indicators are inspected during shutdown and weekly on the SAP (proprietary name) PMS (Planned Maintenance System). Instrument Technician weekly Planned Maintenance (PM) inspections, including the sensors, were sampled and reviewed in 2024 and 2025. Transfer from the mixing to the dosing tank is initiated manually. The mixing tank cyanide transfer pump is interlocked with the cyanide dosing tank level and switches off automatically at 80% capacity.

Only solid cyanide is used and mixed inside a bunded concrete area designed to contain any leakage (confirmed in site inspection). Marine containers containing 20 x 1 ton, WIBCs (Wooden Intermediate Bulk Containers) of sodium cyanide briquettes are unloaded on concrete bases, adjoining the warehouse.

The cyanide mixing and dosing tanks are equipped with level sensors. Level indications on the SCADA (Supervisory Control And Data Acquisition) display system in the control room were sighted. It was reported that the cyanide mixing automatic tank water valve is opened by the SCADA system at 10% volume and automatically closed at 80%. Level indicators are inspected during shutdown and weekly on the SAP (proprietary name) PMS (Planned Maintenance System). Transfer from the mixing to the dosing tank is initiated manually. The mixing tank cyanide transfer pump is interlocked with the cyanide dosing tank level and switches off automatically at 80% capacity. The Liquid Cyanide Transfer from Make Up to Dosing Tank Procedure describes the task steps between the SCADA operator and the CIL (Carbon-In-Leach) supervisor to check tank levels and ensure safe transfer of liquid cyanide between the makeup tank and the dosing tanks, to avoid over-topping and to ensure that the pipeline between the tanks is flushed. The cyanide mixing and dosing tanks are equipped with ventilation pipes.

It was confirmed during the site inspection that the cyanide mixing tank and storage tank are installed on a hexagonal concrete plinth overlain by four layers of HDPE (High Density Poly Ethylene) lining, forming an impermeable layer between the tank bases and ring beam compacted soil. Shiftly operational inspections would detect any leakages from the bottom of the mixing and storage tanks flowing out along the surface of the HDPE lining. The cyanide mixing tank and the cyanide dosing tank (cyanide storage tank) are installed inside a concrete bund, which includes a sump and a pump to return spillages to the tank or the process. The tanks are made of mild steel, which provides a competent barrier to leakage.

The solid sodium cyanide shed is fitted with a galvanised sheeting roof and sides to prevent water from coming into contact with the cyanide boxes. The shed is fitted with brick retaining walls. It was observed that the retaining walls have been repaired and are in good condition. No water was observed inside the shed. During the site inspection, the boxes were observed to be in good condition, with no evidence of water damage. The cyanide shed is equipped with two entrances with mesh to assist with ventilation, and the roof of the cyanide shed includes a ventilation apex.

The cyanide mixing facility and the solid cyanide shed are located inside the reagent area, and the outside gate is locked. There is a gate and fencing around the cyanide mixing facility, and the



cyanide shed is fenced. The gates are locked and require two people to remove the locks. During the site inspection, it was confirmed that both the Storeman and the Security official were required to unlock their respective locks to gain entry to the solid cyanide store. An entry register was sighted, which had to be signed by the auditor before access. The key control is the responsibility of the Warehouse and Security Supervisors.

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

X in full compliance with

The operation is

☐ in substantial compliance with **Standard of Practice 3.2**

☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

Secure disposal of empty cyanide boxes is governed by the procedure, Disposal of Empty Cyanide Boxes, and Section 8 – Steps of Disposing, states, “...Under no condition will the boxes ever be sold, donated or removed from the site. The only method of disposal is immediate burning of the boxes according to the recommendations of the manufacturer...” The boxes are loaded under the supervision of the Reagent Supervisor, Reagent Operator, Truck driver, and Security Escort. One person must always be present at the burning area until all the material is burnt.

In the Sodium Cyanide Briquettes Makeup procedure, Section 6 – Empty Bags Destruction, states that all empty cyanide bags should be placed back in the box and escorted immediately to the burning area before 8.00 pm without delay and be incinerated within 12 hours.

The Risk Assessment covering the rinsing of the bag, after bag breaking and dropping the cyanide into the mixing tank, dated 2020, concluding that rinsing the bags results in a higher risk of liquids spilling from the rinse operation during transport to the bag burning facility. Thus, bags are not rinsed.

The procedure, Disposal of Empty Cyanide Boxes, includes a Section 8, Steps of Disposing, which is a sequenced task list for managing the disposal of wooden cyanide boxes, plastic liners, and bags from the completion of adding cyanide briquettes to the cyanide makeup tank through to their final burning in the secure burning area.

No cyanide drums are used on site. Solid Sodium Cyanide is delivered in polypropylene bags with inner polyethylene (PE) plastic liners, both of which are contained in sealed wooden boxes (WIBCs – Wooden Intermediate Bulk Containers). In the procedure, Unloading Cyanide Wooden Boxes from Containers at Loulo, Section 5, Unloading Procedure, requires that all empty marine containers be locked, properly cleaned, and free of hazardous cyanide content. In the Sodium Cyanide Briquettes Makeup Procedure, Section 8 – Procedure, sub-section g) covers cleaning of the forklift, sub-section h) covers cleaning the top and bottom of the makeup tank to disperse any solid cyanide, and sub-section i) covers the cleaning of all the surrounds and under the tower crane of any potential spills.



In the Sodium Cyanide Briquettes Makeup Procedure, Section - Make-Up Interlocks, covers the sequencing of opening and closing of valves. The instrument technician conducts a Weekly Instrument Inspection of the Cyanide Mixing Tank, including checking the mixing valve and tank-level indicator, inspecting for visible leaks, and, if necessary, calibrating the level detector. The procedure, Liquid Cyanide Transfer from Dosing to Leach, includes a section 5. Transfer Procedure, which contains the actions and checks to be made to prevent spillages or overtopping. The procedure, Storage of Cyanide Containers at Loulo Gold Mine, states in Section 6, "...Containers will only be stored on level ground, not more than two high..."

No liquid cyanide is delivered to the site, but both liquid and solid sodium cyanide are used on the site. In the case of managing spillages (liquid or solid), the Sodium Cyanide Briquettes Makeup procedure states in Section 8, Procedure, "...g) Decontamination of truck (forklift), (if applicable) h) Clean on top and bottom of makeup tank to disperse any briquettes left on the grating and soil and i) Clean all surrounds and under the tower crane for any suspect (sic) of spill..." In Section 10 – Accidental Releases Measures, it states, "...Spillage areas and contaminated solids can be detoxified by treatment with an excess of dilute sodium hypochlorite, calcium hypochlorite or ferrous sulphate after the addition of soda ash or lime to raise the pH to greater than 10.5..."

In the Sodium Cyanide Mixing procedure, Section 8 - Procedure, subsection - Make up a New Batch Instruction, it states that mixing cyanide can only be done using the buddy system and item j, states that the Buddy system will be utilised at all times. In the Buddy System Related to Cyanide Management procedure, the scope states that the buddy procedure applies to all personnel involved in the handling, preparation, and mixing of cyanide solution.

The producer adds red carmoisine dye at the production facility. In the Sodium Cyanide Briquettes Make Up Procedure, Section 8 – Procedure, under Makeup a New Batch Instruction, section f of the penultimate bullet point states, "...Cyanide briquettes are produced with dye from the manufacturer..."

Principle 4. OPERATIONS:

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

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

X in full compliance with

The operation is

☐ in substantial compliance with **Standard of Practice 4.1**

☐ not in compliance with



Basis for this Finding/Deficiencies Identified:

The Gold Plant has 33 cyanide standard operating and engineering procedures (SOPs) and 7 cyanide environmental procedures. There is a Loulo Gold Mine Tailings Storage Facility (TSF) Operation, Maintenance and Surveillance Manual (OMS) which includes: -

- ☐ Tailings Facility Description
- ☐ Seismicity
- ☐ Geotechnical Information
- ☐ Freeboard
- ☐ Slurry Delivery Line
- ☐ Decant System
- ☐ Roles & Responsibilities
- ☐ Failure Mode & Effects Analysis
- ☐ Zone of Influence
- ☐ Consequence Classification
- ☐ Operations
- ☐ Monitoring & Reporting
- ☐ Inspections & Management
- ☐ Safe Work Procedures
- ☐ Emergency Response Plan
- ☐ Maintenance
- ☐ Deviance Accountability Report

Also sighted were 15 TSF Safe Work Procedures (SWPs) covering Installation of Walkways on Dam slopes; Installation of Freeboard Poles; Installation of Batterboard; Installation of pond location poles; Manual cleaning of solution trench; Cutting of gras; Connecting and disconnecting of pipes/valves; Opening and closing of valves; Closing of ratholes; Pumping Operations (Start and Stops); Installation of Piezo Support Poles; Manual wall packing; Construction of penstock catwalk and platform; Deposition control and monitoring; and Lifting of tools and equipment.

Quarterly Reports from 2022, 2023, 2024 and 2025 were sampled and shown to include:- details of facility inspections, performance parameters, ongoing corrective action plan, and recommendations, signed by George Papageorgiou, Engineer of Record. The Reports also reference the Site Memo Register, which documents operational updates and remedial actions taken at the TSF.

The Detailed Design Report for the Loulo Gold Mine Tailings Dams Extension Project Report dated June 2020 includes: -

- Design Storm Event: 1:50 year event, 7-day storm event: 281 mm
- The freeboard on the RWD (Return Water Dam) and SWD (Storm Water Dam) meets the minimum requirements set out in Code of Practice, Mine Residue, SANS 0286:1998. TSF Plans are currently aligned to the Global Industry Standard on Tailings Management (GISTM), which strives to achieve the ultimate goal of zero harm to people and the environment with zero tolerance for human fatality. It requires Operators to take responsibility and prioritise the safety of tailings facilities through all phases of a facility's lifecycle, including closure and post-closure. It also requires the disclosure of relevant information to support public accountability.



TSF Quarterly reviewed Reports from the last certification audit to the current reports available were sighted and sampled. Current Dam construction drawings, geotechnical support documents, and the original Randgold Resources Tailings Dam Design report and the West Extension, as-built drawings pack were sighted and sampled.

The Loulo Semi-Quantitative Risk Assessment, dated 13 September 20223, prepared by Lane Associates, was sighted and reviewed. The report outlined the process and findings of both the potential failure mode analysis and the subsequent semi-quantitative risk assessment undertaken for the Loulo-Gounkoto operation, confirming that the currently planned buttressing of the external walls of the TSFs results in a marked reduction in the existing risk.

It was confirmed in the Monitoring and Measurement Procedure that Free and WAD cyanide Level Targets were as follows:-

TSF Free cyanide: 10 mg/l WAD cyanide: 50 mg/l

Paste Plant Free cyanide: 0.1mg/l WAD cyanide: 0.5mg/l

The Loulo TSF Loulo Gold Mine TSF Quarterly Reports were sampled and reviewed.

Quarterly 1 2023 Report – March 2023 signed George Papageorgiou, Engineer of Record. This report outlines a corrective action plan to address identified risks and issues.

Quarterly 4 Report, November 2024, details facility inspections, performance parameters, ongoing corrective action plan, and recommendations, signed by George Papageorgiou, Engineer of Record. The Report also references the Site Memo Register, which documents operational updates and remedial actions taken at the TSF.

The Loulo MMS (Monthly Monitoring System) monthly report was sighted. The report covers all weekly operating data to the end of September 2025. Data sheets include return water, climatic data, combined freeboard, piezometer plots, toe drains and seepage, rainfall data, combined TSF freeboard measurements, Return water dam levels, and storm water dam levels. A quarterly action register includes actions/recommendations, reference numbers, risk ratings, priority ratings, and expected completion dates. The ongoing Consolidated Weekly Report was also sighted and reviewed. The report includes daily rainfall and rainfall comparisons, pool levels and locations, weekly freeboard recordings, drain flows, Piezometer comments, seepage issues, return water balance, projects, corrective action progress, and red flag issues. Daily inspections and measurements are included in the weekly MMS.

Operational Shiftly inspections were conducted, and the checklist for high-strength cyanide facilities was sighted, including bund contents, tanks, pumps, and pipes. The Cyanide line daily inspection and the CIL dosing and make-up monthly inspection were also sighted. A Management inspection feedback report was reviewed, including the areas inspected and reagents. This inspection serves as an over inspection facility for other routine inspection events. This inspection highlights housekeeping weaknesses, which subsequent over-inspections confirmed were corrected. The Occupational Health and Safety Inspection Feedback Report was reviewed. It reported on the Reagents Tracking inspection. This functions as an over-inspection facility for other routine inspection events. There is also a SAP (Proprietary name) computerised planned maintenance system (PMS) that contains all scheduled planned maintenance inspections. The Cyanide Management of Change Procedure and the Corporate Management of Change Procedure were sighted. A MOC (Management of Change) exercise covering the repair of the cyanide mixing tank due to leaks at the weld points was observed. This was a short-term solution; the long-term solution is to replace the tank. Weld repairs on the cyanide tank were undertaken in accordance with the approved welding job card No 162202 dated 20/02/2025.

Subsequent thickness tests were carried out on the cyanide tank, and the tank thickness was found to be within acceptable limits. The work and documentation were reviewed by the Plant Reliability Engineer, Mr M Samake, who signed a fit-for-purpose affirmation for the tank on 23rd February 2025. It was confirmed that the MOC document was signed off by the Safety and Health Manager and the Environmental and Community Managers.

Cyanide management contingency procedures for non-standard operating situations are covered in different ways. The updated TSF water balance confirmed that the facility does not need to shut down due to issues identified during inspections. Sufficient freeboard is available to contain water in the event of abnormal conditions. A water management system is in place at the start of the rainy season and is managed by the multidisciplinary Water Management Committee. The Committee meets weekly and deals with abnormal and emergency situations. The plant conducts monthly shutdowns for planned maintenance, following standard operating procedures for plant start-ups and shutdowns. Routine operational, PMS, Safety & Health, and legal inspections that identify abnormal or emergency issues will be reported to management for appropriate mitigation actions. There is also a Cyanide Contingency Planning Procedure in place. This procedure includes processes to address known and unknown situations that may occur, such as work stoppages, shortages of ore, or other essential materials, economic conditions, civil unrest, or legal or regulatory actions. The purpose "...aims to prepare Loulo Gold Mine to respond to any cyanide emergency event and its potential humanitarian(sic), protect the spread of impacts towards the surrounding communities and prevent environmental impacts when there is an unplanned event or incident, when a temporary closure has happened, or when a cessation of operations may be necessary..." The procedure describes the processes described within the procedure to address how cyanide would be managed in event of a temporary closure, for example through a management decision process considering the nature, reasons, or length of the shutdown.

Detailed operational and engineering inspections are carried out on all cyanide equipment. These are summarised as follows:-

Tanks

All Tanks are included on the SAP system, including the cyanide Mixing and Dosing Tanks, Leach tanks, Elution tanks, Tailings Tanks, and Thickeners. All tanks undergo annual PM (Planned Maintenance) inspections and boilermaker, fitter and instrument technician planned inspections were sampled and reviewed.

Secondary Containments

Secondary containments are checked as a part of daily operational inspections and tank inspections. Cyanide Makeup Checklists include checks on Tanks and bund walls and bund contents. During the site inspection, the concrete secondary containments were observed to be in good condition with no damage or cracks.

Leak Detection and Collection Systems

There is a leak-detection sump that, if the TSF liner leaks, will detect any flow. This is monitored as part of the TSF inspections. Additionally, the Process Plant team takes samples from the sump water. Therefore, if it is believed that there might be a leak not linked to the curtain drain sump, the TSF team can ask them to test the water for salt, based on historical data from the sump. The under-drain sump flows daily, and as the water table rises, the flow rate increases. The other sump is the curtain sump (Leak detection). This drain is inside the starter wall of the Return Water Dam. These systems are a part of the design to monitor and manage liquid flows around



the TSF. There is a leak detection system, as a part of the Risk-Based Inspection (RBI) system on the leach tanks. RBI is addressed below in 4.7.

Pipelines, Pumps and Valves

Most high-strength cyanide pipeline is made of HDPE and, therefore, not thickness tested. High-strength cyanide pipelines do not have pipe-within-a-pipe or launder secondary containments. The Site will install launders sloping to drainage pipes to pots at the base in areas where employees walk under unprotected pipes. As an interim protection, all areas where high-strength cyanide pipelines flow over walkways or accesses, have warning signs requiring the checking of the pipes for leaks. Pumps, pipes, and valves are covered during the operational inspections. Those sampled include: - Fitter weekly inspections of Cyanide reticulation, weekly inspection on Cyanide Dosing Pump, Weekly Fitter inspection of Cyanide Pump No 2, Boilermaker annual Thickness test on Cyanide Mixing Tank No 1, Cyanide Makeup Checklist, including checks on Tank and bund walls, Transfer pump, and Transfer line, Instrument technician monthly inspections covering cyanide alarms and safety shower activation mechanisms. The TSF pipeline and return water pipelines running through the village are patrolled 24 hours per day for leaks and releases. Leaks are reported by exception. The SAP PMS includes the TSF pipeline.

Ponds and Impoundments Parameters

Various inspections include checking of Ponds and Impoundments Parameters. The Instrument Technicians Weekly Inspection of valves and level transmitters and leaks, the process pond level is indicated on the SCADA in the control room, and inspections of the PCD (Pollution Control Dam) ponds include a regular desilting program, when the ponds are inspected by the Process Department. The Electrician PCD Pump weekly inspection and the Instrument PCD Inspection monitor parameters.

On the TSF, parameters are checked in the daily, weekly and quarterly TSF inspections. The TSF inspection frequencies include weekly inspections, consolidating undocumented daily inspections by Paragon, the TSF operator. Quarterly inspections and reports are done by Epoch Resources and signed off by the Civil Engineer of Record. The SAP PMS system includes daily, weekly, monthly, quarterly, and annual inspections. The process inspections include daily, weekly, and monthly inspections. The auditor considers the inspection frequencies adequate to confirm that the TSF and Plant cyanide facilities are functioning within design parameters. Inspections include the date of the inspection, the name of the inspector, and any observed deficiencies. The nature and date of corrective actions are documented, and records are retained in hard copy and on SAP. Details of corrective actions are typically included in job cards and transferred to the SAP records.

The site has used the SAP (proprietary name) Planned Maintenance System (PMS) since 2022. (The site previously used the PRAGMA (proprietary name) PMS system.) Barrick Corporate has denied Loulo access to SAP records on the Barrick servers since 16 June 2025 for data security reasons. The site commenced saving its PMS data on an Excel spreadsheet-based system. Complete maintenance records date back to the start of the mine and are available but not accessible until Barrick grants access, and the Malian Government agrees to take Barrick Mali out of provisional administration. The system has a complete list of critical cyanide equipment for which daily, weekly, monthly, two-monthly, and quarterly Planned Maintenance (PM) inspections are undertaken by Boilermakers, Fitters, Electricians, and Instrumentation Technicians. Twice-monthly shutdowns are included on the SAP system, and tasks in these shutdowns are listed on SAP. Also included on the SAP system are: - safety showers,



replacement of cyanide antidotes, and electronic level indicators in the cyanide tanks. The SAPS system that has run after 16 June 2025 is a Excel-based spreadsheet which is accumulating historical maintenance data from 16 June. Once access is restored by Barrick, the site will export the Excel maintenance data back into SAP.

Potential power outages are a low risk as the Mine generates its own power. The Generation station has spare capacity to fill in any downtime by generating units. Twelve generators are in place, with four in use at any one time. Thus, power outages affecting the water and slurry pumping capacity is not a credible scenario. Additional back-up power is supplied by solar panels. Operation and maintenance are outsourced to PowerXerex, a specialised Company with on-site presence. PowerXerex took over from the previous French company from December 2022. An emergency power source was observed at the TSF. The risk of overtopping the return water dam and the holding pond at the Detox was covered during the design of the extensions. The system was designed not to overtop as per the original design document.

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

X in full compliance with

The operation is

- ☐ in substantial compliance **with Standard of Practice 4.2**
- ☐ not in compliance with
- ☐ not subject to

Basis for this Finding/Deficiencies Identified:

The plant receives ore from four sources, and each is characterised using bottle roll tests:

- Gara
- Yalea
- Gounko
- Baboto

The various ore sources are characterised continuously and recorded in a database spreadsheet. This information is used in the ore mix planning as per the procedure, Cyanide addition from Make Up to Leach Circuit. The spreadsheet database, including all sources were sampled using Yalea weeks 47-52:

- The spreadsheet covers the various blocks mined at Yalea
- Results include the head grade, recovery, lime consumption, cyanide consumption, copper ppm, arsenic and iron. In each area where mining is taking place, samples are sent to the Metallurgical laboratory for characterisation tests. The laboratory treats 150 samples a week. The same principles are used when new sources are evaluated

Daily bottle roll tests are done on feed and residue samples to check for optimal reagent addition rates. Reagent addition is adjusted, as appropriate, based on the test results. Examples of bottle roll tests were sighted and extended bottle roll leach tests of CIL tails residue samples are done daily.



The current system is adequate for the plant requirements, and no additional improvements are contemplated. New technology is monitored continuously for possible use and implementation. A MINTEK (proprietary name) Cynoprobe 3 is used for on-line free cyanide measurement. The cyanide is dosed via a single dosing line and a hose pump. The cyanide dosing is controlled by a ratio controller with the mass flow system (feed forward), with the Cynoprobe adjusting the ratio as a feedback control. A predictive controller is also used. The cyanide setpoint is set as per the blend and test program results.

Manual free cyanide backup titrations are done using silver nitrate and Rhodanine, hourly. Titrations are compared with the Cynoprobe, and appropriate action is taken if the variance is significant. Planned maintenance is done by MINTEK on the Cynoprobe. If an issue is experienced with the Cynoprobe, manual control is implemented. MINTEK has remote access to the unit from South Africa to assist in case of maintenance issues. Cynoprobe maintenance is done weekly by the Technician. Daily inspections are also carried out. A laboratory Cynoprobe is used for laboratory analyses.

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

X in full compliance with

The operation is

☐ in substantial compliance with **Standard of Practice 4.3**

☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

A spreadsheet-based, probabilistic water balance model for Loulo Gold Mine, including the process plant, TSF, and various dams, is in place. The water balance is updated monthly. This is a probabilistic water balance that accounts for daily rainfall from six measurement stations and includes evaporation.

The model includes (all sighted and confirmed input data): -

- TSF deposition rates, real-time slurry deposition, including feed to the backfill plants,
- precipitation recorded on site since 2003 and includes database rainfall since 1960, evaporation and seepage rates from rain gauges and a weather station,
- the amount of precipitation entering the TSF resulting from surface run-on from any upgradient watershed, including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground has been taken account of in the model,
- impacts of freezing and thawing are not applicable as the site is in Equatorial Africa,
- Potential power outages are low risk as the Mine generates its own power. The Generation station has spare capacity to fill in any downtime by generating units. Eighteen generators are in place, with four in use at any one time. Thus, power outages affecting the water pumping capacity is not a credible scenario. Additional backup power is supplied by solar panels. Operation and maintenance are outsourced to Xer, a specialised Company.

The design storm event was confirmed as the 1:50-year, 24-hour storm event, used in the TSF design water balances, as well as the model (163 mm). The TSF freeboard parameter is set to accommodate the design storm events without pumping from the pool.



The TSF Detox plant (arsenic stabilisation /cyanide detox) at the Return Water Dam is in operation, ready for upsets, 24 hours per day, 7 days per week. TSF inspections and the Monthly Monitoring System (MMS) weekly detail report and data) and quarterly reviews, which includes the phreatic measurements are in place.

Pond and impoundment levels and freeboards were confirmed in TSF inspections (MMS weekly detail report and data) and quarterly reviews. They include the levels of the TSF Return Water Dam and Storm Water Dam, and the Solution Collection Pond (SCP) and TSF freeboard. Also in place is the Epoch TSF design document, in which a deterministic water balance, considering various rainfall events across wet and dry seasons, was used to calculate the new TSF extensions pool, freeboard, RWD, and SWD.

TSF inspections and quarterly reviews, monitor freeboard, and precipitation and weekly Water Management Meetings are held to review water balance. The Mine Model is run monthly to update assumptions. The procedure, Mine Water Consumption Monitoring, identifies responsibilities and accountabilities for collecting and managing data and monitoring water consumption.

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 X in substantial compliance with Standard of Practice 4.4

☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

Graphs showing Cynoprobe online daily average WAD cyanide levels at the compliance point from 1st January 2023 to the audit in October 2025 were reviewed. The plant did not operate from 15th January 2025, owing to difficulties with the Government, and restarted with slurry flowing to the TSF from 12th August 2025.

A summary of WAD cyanide exceedances per year is indicated below.

2023

There were 7 WAD cyanide exceedances: – 8 February – 74 mg/L, 10 February – 56 mg/L, 6 March – 51 mg/L, 13 March – 59.4 mg/L, 3 June – 74.2 mg/L, 9 Sept – 66 mg/L, and 10 Sept – 113.8 mg/L. All exceedances were investigated and brought back to below 50mg/L with increased peroxide dosing. 3 incidents were caused by tailings tank overflow affecting the detox process, 4 incidents were caused by peroxide pump problems, and 1 incident was caused by process plant upsets resulting in elevated WAD cyanide levels.

Although late evidence was presented of analysis of causes and possible solutions, there has been insufficient time to demonstrate that the actions were sustainable in reducing the incidence of WAD cyanide exceedances.

2024

There were 6 WAD cyanide exceedances: - 8 Oct – 56 mg/L, 25 Nov – 64.7 mg/L, 30 Nov – 62.8 mg/L, 2 Dec – 61.07mg/L, 9 Dec – 60.9Mg/L, 23 Dec – 51 mg/L. All exceedances were investigated and brought back to below 50mg/L with increased peroxide dosing. 3 incidents were



caused by Plant residual Cyanide being at 120, 140 and 180 mg/L, respectively, and one incident was caused by peroxide pump problems.

Although late evidence was presented of analysis of causes and possible solutions, there has been insufficient time to demonstrate that the actions were sustainable in reducing the incidence of WAD cyanide exceedances.

2025

There were 10 WAD cyanide exceedances: - 6 July – 72.7 mg/L, 10 July – 134.4 mg/L, 26 Aug – 52.5 mg/L, 28 Aug – 66.5 mg/L, 1 Sept – 60 mg/L, 8 Sept – 70 mg/L, 9 Sept – 90 mg/L, 13 Sept – 106.1 mg/L, 16 Sept – 107.4 mg/L, and 6 Oct – 72.9 mg/L. All exceedances were investigated and brought back to below 50 mg/L with increased peroxide dosing. 7 incidents were caused by tailings tank overflow affecting the detox process, and 3 incidents were caused by cyanide residue in the process, being at 150, 150 and 167 mg/L, respectively. Longer-term actions were to reduce the cyanide set point or reduce the process plant flow rate for 5 – 10 minutes. These actions were not the result of an investigation into the cause of the exceedances.

Although late evidence was presented of analysis of causes and possible solutions, there has been insufficient time to demonstrate that the actions were sustainable in reducing the incidence of WAD cyanide exceedances.

Plant PCD Samples between 2023 and 2025 have shown WAD cyanide levels well below 50mg/L. The highest reading was one of 32mg/L WAD cyanide, and the remainder were below 20mg/L

Whilst WAD cyanide exceedances were recorded and investigated, and immediate action taken to reduce the WAD cyanide levels below 50 mg/L, there was little evidence that the exceedances were reviewed with a view to identifying the causes in the process and looking for ways and means to eliminate or reduce these causes. Some causes have carried through the years. Whilst the Code does not expect 100%, it does expect that repeated causes be investigated to explore ways of preventing recurrence. Some longer-term corrective actions have been initiated, but there has been insufficient time to evaluate if the actions are sustainable and managing the root causes.

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

X in full compliance with

The operation is ☐ in substantial compliance with **Standard of Practice 4.5**
☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

It was confirmed during interviews with Mine staff that, under normal circumstances, no water containing cyanide is discharged to the environment. All water is contained and recycled to the plant via the lined return water dam at the TSF.

However, in exceptional wet seasons, it may be necessary to release water from the Stormwater Dam. This has only occurred once since the last certification audit, in 2024, when exceptional rainfall occurred. The rainfall was higher than in the previous 60 years.

Under those circumstances, the discharge is monitored before being released and is below the limits of detection for WAD cyanide (0.001 mg/L) and less than 0.5 mg/L for Free cyanide. The Water Management Committee liaised with stakeholders and the Regional Governor to obtain a permit to discharge water. The Committee met daily over the period in question to monitor the discharge water quality.

Under normal circumstances, no water is discharged from the process facilities.

SW45 (North Side of SWD) is a surface water monitoring point located outside the TSF perimeter. There is also a second surface water monitoring point, SW2 (Baboto Bridge), situated over the River Faleme, adjacent to the nearest community. SW1 was established to monitor water quality due to illegal mining in the area, which could affect the River Gara, a tributary of the River Faleme.

Results from 28 September 2024 to 30 September 2024 all show results for SW45 below the limits of detection (0.001 mg/L for both WAD and free cyanide). Similarly, the results for SW2 from 13 September 2024 – 17 September 2024 were below the limits of detection (0.001 mg/L).

A tributary to the Falémé river is located approximately 200 m northeast of the TSF and only runs seasonally. The Falémé is sampled upstream (SW2) and downstream of the TSF. Values from 2022 to the date of the audit were sighted.

- Upstream: all values are below the levels of detection of 0.005 ppm WAD cyanide.

- Downstream: all values are below the levels of detection of 0.005 ppm WAD cyanide.

The samples indicate that no indirect discharge to surface water occurs, and no remedial activity to prevent further degradation and restore beneficial use has been necessary.

***Standard of Practice 4.6:** Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of ground water.*

X in full compliance with

The operation is

☐ in substantial compliance with **Standard of Practice 4.6**

☐ not in compliance with

Basis for this Finding/Deficiencies Identified

All plant facilities are installed within bunds, with any spillage returned to the process. The plant is fitted with extensive concrete slabs draining to the pollution control dam, from where it is returned to the process. The process water dam is lined with an HDPE (High-Density Polyethylene) liner, regularly maintained, and is on the Planned Maintenance System. There is also a Water Management Committee that manages water management facilities and considers inspection reports on facilities. The TSF return water dam and storm water dams are lined with HDPE. The TSFs are equipped with toe or underdrains, removing water to the return water system, and all water trenches are concreted, which was confirmed during the site inspection.

Beneficial uses of specific boreholes are for human consumption, and the Malian Government limit for total Cyanide is 0.07ppm Total cyanide. Boreholes are sampled monthly by the Mine. Boreholes for human consumption are sampled quarterly by the Malian Government and analysed by the National Laboratory of Water, and monthly by the Mine. The mine samples are duplicated, and the second sample is submitted to the Government and analysed by the

Government's accredited laboratory. The Mine analyses for WAD cyanide, Free cyanide and Total cyanide.

Samples from March 2023 to September 2025 were sighted:

- Upstream of the TSF: LGW53 and 54: values of 0 for Total cyanide, WAD Cyanide and Free cyanide.
- Downstream of the TSF: BH 18, BH 8B, BH 17, values of 0 for Total cyanide, WAD Cyanide and Free cyanide.
- Upstream of the Plant: values of 0 for Total cyanide, WAD Cyanide and Free cyanide.
- Downstream of the plant LGW 63: values of 0 for Total cyanide, WAD Cyanide and Free cyanide.

The mine uses underground backfill, prepared by cycloning. The standard for underground fill WAD cyanide is to detoxify the material to less than 0.5 mg/L WAD cyanide and less than 0.1 mg/L free cyanide. Backfill is prepared in batches, and no batch is permitted to go underground unless it meets the standard requirement. It is therefore deemed that the backfill facility (underground) is not a cyanide facility as per the ICMI definition and not part of the scope of the audit. It was confirmed that the backfill is detoxified in the detoxification plant to less than 0.5mg/L and less than 0.1 mg/L free cyanide. The results for the whole of 2023 and 2025 were reviewed, and there were no exceedances in either year.

Seepage from the operation has not caused cyanide concentrations of ground water to rise above levels protective of beneficial use, and no indications were observed that remedial activity is required or undertaken.

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

X in full compliance with

The operation is

☐ in substantial compliance with **Standard of Practice 4.7**

☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

During the site inspection, it was confirmed that the cyanide mixing tank and dosing tank are installed on four layers of impervious HDPE lining. The tanks were repaired in accordance with the RBI (Risk-Based Inspection) inspection recommendations. A baseline RBI inspection was conducted by an external Professional Engineer, and the RBI inspection report was sighted, including the RBI risk assessment and priorities. The corrective actions were included in the SAP planned maintenance system. On-going tank inspection records and thickness testing records were sighted.

Secondary containments for tanks are sized as follows:-

- Cyanide mixing tank 62.9 m³, bund volume 91.7 m³.
- Cyanide dosing tank 108 m³, bund volume 132.3 m³.
- CIL largest tank 2 500 m³, bund volume 2 073 m³ - linked to PCD.
- Zadra Tank volume 30 m³, Zadra Bund Volume 33 m³.
- Elution bund largest tank 25.08 m³, bund capacity 33 m³.

- Elution Column 1: 25 m³, bund volume 33 m³.
- Elution column 2: 25 m³, bund volume 33 m³.
- Thickener volume 2 356 m³, linked to PCD via concrete trenches.
- PCD 1 volume: 8 816 m³.
- PCD 2 volume: 8 816 m³.
- Clarifier Intermediate Plant 2 100 m³ - linked to PCDs.
- Thickener IP Intermediate Plant 2 100 m³ - linked to PCDs.
- Basement Thickener IP - linked to PCDs.

All bunds are equipped with sump pumps, returning any spillages to the process. All high-strength cyanide bunds are equipped with sump pumps that are manually started and can return the cyanide to the tank. There are no tanks without secondary containment. This was confirmed during the site inspection.

The reagent-strength cyanide pipeline from the mixing tank to the dosing tank runs across competent concrete areas, draining to the PCD in case of leaks. The TSF tailings and return water pipelines are placed inside earth trenches, and low point collection paddocks are installed to retain flow down of pipe leaks from the trenches. Continuous daily foot/bicycle TSF pipe patrols are conducted, and leaks are reported. It was reported that the cyanide pipelines at the plant pose no risk to surface water. It was observed that the TSF residue and return water pipelines cross a few intermittently flowing streams. It is reported that they dry up in the dry season. The streams are routed underneath the pipe trench through concrete pipes and culverts to route them away from the contaminated process water flows. The procedure, TSF Pipeline Rupture, states: -

“...Item 13. Clean up properly (sic) the area after decontamination as soon as possible....Remove all waste and dispose of them (sic) on top of the tailing...”

It was confirmed that the cyanide tanks are made of carbon steel. The pipelines are made of HDPE (High Density Polyethylene), and the valves are made of stainless steel, all of which are compatible with cyanide and high pH conditions. The TSF tailings slurry pipeline is constructed of steel to reduce the risk of failure and return water lines are constructed of HDPE (High Density Polyethylene). Similarly, both materials are compatible with cyanide and high pH conditions.

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

X in substantial compliance with Standard of Practice 4.8

☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

TSF construction of the Old TSF and the Western Extension is an ongoing work-in-progress, and oversight through the Engineer of Record, George Papageorgiou, BSc, MSc, PhD Eng (Civil), and the Quarterly Meetings monitors progress against design and manages necessary changes

and modifications, as well as regular inspections and reporting using the MMS. Gold Plant QA/QC (Quality Control/Quality Assurance) was reviewed and audited during the certification audit, and it was confirmed that all documentation is archived and available. A new Gekko ILR (InLine Leach Reactor) was constructed but no QA/QC documentation was made available to the auditor. It is reported that a separate “fit-for-purpose” Structural Engineer’s Report has been completed on the Gekko ILR and that the recommendations from the Report have been implemented.

The structural “fit-for-purpose” Audit for the Plant was carried out in 2017 and was reportedly followed up by an updated audit. This updated audit report was not shown to the auditor.

No QA/QC reports were available for the new GEKKO ILR. It was reported that a Fit-for-Purpose Report has been prepared by a Structural Engineer to demonstrate that the facility was constructed “fit-for-purpose”, but this report was never presented to the auditor.

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

X in full compliance with

The operation is ☐ in substantial compliance with **Standard of Practice 4.9**
☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

The operation has a Cyanide Sampling and Analysis Procedure. The purpose of the procedure is to define the sampling plan, schedule, procedure (including preservation), custody chain, and analytical scope and quality control measures. It applies to solid and solution samples. It furthermore defines the necessary safety precautions with respect to field work and chemical use aspects. The Procedure was originally signed off by Peter Lotz, 16/2/2021, ICMI Mining Auditor, Sampling and Analyses Consultant, and Manager: Process and Environment, Maelgwyn Mineral Services, Africa. Procedures have been subsequently amended by Drissa Samake, Environmental Officer, MSc Hydrogeologist Engineer at ‘Ecole Nationale d’ingenieur de Bamako’ Mali (2021), Teneman Konate, Environmental Superintendent, MSc Chemical and Environment Process Engineer at ‘Universite de Khemis Miliana’ Algerie (2018), and Mohamed Keita, Environmental and Social Manager, MSc Ecotoxicology Engineer at ‘Universite du Man’ France (2013). It was confirmed the following are included in the procedure: -

- Sampling frequencies
- Cyanide Species
- Sample location map
- Sampling point location table specifying species to be analysed for, location, procedure, frequency
- Sampling procedure section 6.2 includes sample preservation and chain of custody requirements
- Quality Control measures

Weather, livestock/wildlife activity, and anthropogenic influences are not specifically included in the Sample Sheet but are expected to be included in a comments box. The auditor reviewed

sample sheets from 2023, 2024 and 2025 and comments on anthropogenic influences, water levels, and weather were included in the comments columns. The sampling frequency and procedure section, and the table detailing sampling points and frequencies, were reviewed, and the auditor deemed the sampling frequencies adequate.

The environmental laboratory procedure uses continuous flow analyses (FS3100) and is coupled with an amphoteric detector for WAD analyses.

There is also a Surface Water Monitoring procedure and a Procedure – Conservation of Flora and Fauna, which includes in section 5.3 Animal Fatality Investigation.

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.

X in full compliance with

The operation is

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

☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

The Loulo Gold Mine ICMI Compliance, Loulo Decontamination and Decommissioning Plan, contains 9 main sections: - Introduction; Scope of this Plan; Site description; Health and Safety considerations, Decontamination and Decommissioning (including cyanide decommissioning); Area specific plans; Implementation schedule; Audit and Review, and Bibliography. The Plan includes an Implementation Schedule (Figure 3: Preliminary Loulo Gold Mine Processing Plant Decommissioning and Decontamination Schedule) on pages 25 and 26. The Plan includes review requirements in Section 8, Audit and Review.

"....8.1 Internal Review

The Decontamination and Decommissioning Plan will be revised/updated annually as part of the review and updating of the Operation's Mine Closure Plan. The plan will be assessed and modified to suit changes related to the Closure, Decommissioning, Decontamination and Dismantling activities...."

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

X in substantial compliance with Standard of Practice 5.2

☐ not in compliance with



Basis for this Finding/Deficiencies Identified:

The Annual Third-Party Closure Cost Assessment – September 2024 Update, Loulo Mine, prepared by Digby Wells Environmental, was sighted. The report includes the following: -

"...Allowance has been made for the decontamination and clean-up of the Plant. This consists of:

- Floor clean up: 10ha of the soil at the Plant will be removed at a depth of 0.3m and processed through the Plant. This activity is seen as an economic activity but will also remove any contamination.

- Infrastructure clean-up and decontamination: The crushers and mills will need to be cleaned. The thickeners, Carbon in Leach (CIL) tanks, reagent tanks and tailings tanks will also need cleaning. Cyanide decontamination of the plant has been included. This involves the flushing of tanks such as the CIL with copper sulphate. The methodology developed includes equipment, staff, chemicals (copper sulphate) and electricity costs. It is estimated that the clean-up process will take roughly 10 months to complete..."

The Plan includes rates for cyanide decommissioning and a total Close Plan Cost (including third-party cyanide decommissioning) of \$51,815,308.

The Malian Government now requires that funding for closure, decontamination and decommissioning be lodged in a separate financial instrument with a Malian bank or financial institution. Loulo Mine is about to start negotiating with the Malian Government to establish an acceptable financial instrument. **Currently, the unapproved financial mechanism is a Letter of Financial Strength dated in 2021.**

In the meantime, Loulo Mine has reserved funding for closure, decontamination and decommissioning in its balance sheet. If Closure were to occur now, it is understood that the responsibility would fall to Barrick based upon Barrick Gold Corporation Letter of Financial Strength, dated 29th March 2021 and signed by Graham Shuttleworth, Senior Executive Vice-President and Barrick Chief Financial Officer, using tests set forth in 10 CFR Part 30, Appendix A to demonstrate financial assurance, as required by 10 CFR Part 40, Appendix A Criteria 9 (approved by ICMI) and a letter dated 19th July 2021 from John Behrens, Director of Business Assurance and SOX for Africa and the Middle East, Barrick Gold Holdings, stating that Loulo Gold Mine is a subsidiary of Barrick Gold Corporation, Canada. **Until Loulo Mine has negotiated and signed an agreement designating an instrument acceptable to the government, no acceptable financial instrument is in place. Updated documentation guaranteeing that Barrick Gold Corporation would fund Loulo Mine Closure costs (including cyanide decontamination and decommissioning), i.e. an updated Letter of Financial Strength, was not available.**

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 or control them.

X in full compliance with

The operation is

☐ in substantial compliance with **Standard of Practice 6.1**

☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

The operation has a series of procedures for undertaking cyanide-related tasks safely. The following procedures were sighted and reviewed to check and confirm the minimising of worker exposure, use of Personal protective equipment, and pre-work inspections:-

1. Procedure, Cleaning of Cyanide Contaminated Equipment, No. PRO_REA_-SOP-20,
2. Maintenance on Cyanide Pipes, No. PRO_REA-SOP-15,
3. Maintenance on Cyanide Valves, No. PRO_REA-SOP-16,
4. Confined space entry procedure, OHS_GEN-SOP- 006,
5. Hot work procedure, OHS_GEN-SOP- 007, and
6. Sodium Cyanide Mixing Procedure, No.PRO_REA-SOP-001.

Loulo Gold Processing Plant solicits and actively considers input on developing and evaluating health and safety procedures through the weekly Health and Safety meetings. Comments can also be submitted via shiftily toolbox talks in the mornings. For example, from 9-15 September 2024, the topic of Chemicals and Hazardous Substances was introduced. Workers are also involved in issue-based risk assessments. For example, a risk assessment on tank cleaning was held on 15 September 2025, included seven of the workforce involved.

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.

X in full compliance with

The operation is

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

☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

The Sodium Cyanide Mixing Procedure includes “item (i) Five bags (25 kg x 5 = 125 kg) of caustic are added to the cyanide-mixing tank to maintain high pH”. The CIL Reagent Addition Procedure refers to a pH of 10.4-11.00 being required in Tank 1, and in Section 7, it states that Lime is required to be added to increase pH levels.

Hot Spot Surveys for HCN gas are carried out. A Survey was sighted and sampled as being carried out on 17 August 2024 and 20 March 2023 in the Reagent handling area, Metallurgical Plant and 1-Plant. The results indicated no deviations of requirements of current controls. No HCN was detected by the HCN monitors.

The operation has 12 x fixed Polytron HCN Gas monitors, 10 x XAM 5000 multi-gas (including cyanide) personal monitors, which are maintained and calibrated by the Instrumentation Department. The monitors are set to alarm at 4.7 ppm (first alarm) and at 10 ppm (second alarm). The workforce will evacuate to the nearest assembly point should monitors alarm at 4.7ppm or 10ppm. The Instrumentation Department has the required equipment and gas standards to calibrate the units. A fixed monitor calibration sheet and the SOP for calibration of HCN gas monitors was sighted and reviewed. The Instrumentation staff were trained by gas monitor manufacturer, Dräger, and all calibrations are recorded on Job cards in the SAP PMS system. Dräger, recommends calibration every 6 months. Dräger training certificates of

instrument technicians were sighted. Refresher training or replacement of the certificate is only required if monitors are changed or upgraded. Calibration records for three years were sighted and reviewed.

During the site inspection, appropriate warning signage 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, were placed at the entrance to the reagent area, the cyanide mixing tank area and the cyanide dosing tank area. Adequate additional, appropriate signage was also located throughout the site. The sodium cyanide manufacturer adds red carmoisine dye to cyanide briquettes during production.

During the site inspection, it was confirmed that safety showers, including eye-wash stations and fire extinguishers, are located in critical areas. Safety showers inspections are included in the SAP system. The SAP system review confirmed that safety showers are inspected weekly by the Fitter. (Checked inspections dated 10-1-2023, 24-01-2023, and 2-1-2025). Fire extinguishers are inspected monthly by the external Company, Adama Niare. It was confirmed that bimonthly inspections are marked on the labels of the individual fire extinguishers. If a fire extinguisher is found to be faulty, it is replaced with a new one.

During the site inspection it was noted that unloading, storage, mixing and process tanks and piping containing cyanide were appropriately labelled and colour-coded. TSF pipelines are labelled in Bambara (local dialect), French, and English as not potable and toxic, as confirmed during the site inspection.

The official working language on the site is French. First aid procedures are also available in French. French Hebei cyanide Safety Data Sheets (SDSs) are available at the plant.

All incidents are investigated in accordance with the Loulo-Barrick incident procedure. No cyanide exposure incidents have been reported to date. There were no cyanide incidents since the last certification audit that needed to be investigated. An incident that was fully reported and investigated was identified: the report dated 10/03/2021 (no more recent lost-time injuries were available to use as examples) related to a Driller injured by a non-standard response to equipment failure. The report includes reports, analyses, conclusions and recommendations.

Standard of Practice 6.3: Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

X in full compliance with

The operation is ☒ in substantial compliance with **Standard of Practice 6.3**
☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

The plant has 6 cyanide emergency cabinets located at: - Reagents, Elution CIL, Gold Room, Met Lab, Intermediate Plant, and Training Room. It was confirmed during the site inspection that cyanide antidote is stored in a fridge. Medical oxygen, face masks and canisters and resuscitators are stored in the cabinets. Water, radio, cell phones, and a mandown alarm system are confirmed to be used and available. Safety showers are also linked to the control room via alarms.



Cyanide emergency cabinets are inspected weekly. During the document review, the Elution Cabinet inspection checklist – October 2023, the Reagent Cabinet inspection checklist – January 2023, the Elution Cabinet inspection checklist – September 2025, and the CIL Cabinet inspection checklist – February 2025 were sighted and reviewed.

The operation has a Cyanide Emergency Preparedness and Response Plan, an Emergency Team Procedure for Cyanide Spill, and a Cyanide Patient Evacuation: Procedure which includes responses to all potential cyanide pathways (i.e. ingestion, inhalation, and absorption through the skin and eyes).

An on-site clinic is available to treat cyanide emergencies with two ambulances under its direct control. An interview with the doctor and a clinic site visit confirmed that Cyano kits (antidotes stored in the pharmacy), a cyanide emergency doctor's bag including PPE, an emergency room that could handle one patient, with options to transfer multiple cases to two other rooms, oxygen connections, are available in the clinic. The cyanide antidote kits are ordered based on a SAP PMS instruction to the Doctor and Pharmacy. An ex-COVID-19 Treatment room is also available for additional cyanide patients. The six plant emergency cabinets contain a Cyano-Kit, each stored in fridges.

The clinic has two ambulances under its direct control. No internal procedure is required as the mine ambulances have free access to all parts of the mine. The doctor on duty will make all medical decisions regarding patient transport, either to local facilities or via medevac by aircraft to international medical facilities. The "Medical Evacuation Procedure", describes the process of medical evacuation from the Plant and Medical evacuation to the Bamako Polyclinique Guindo or international facilities. The Clinic doctor contacted Polyclinique Guindo in Bamako and confirmed that the facility was able to take cyanide patients. The doctor also indicated that the hospital could conduct blood-cyanide tests. The preference is to use on-site clinic overnight facilities rather than local hospital facilities.

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.

X in full compliance with

The operation is

☐ in substantial compliance with **Standard of Practice 7.1**

☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

The operation has a Cyanide Emergency Preparedness and Response Plan, an Emergency Team Procedure for Cyanide Spill, and a Cyanide Patient Evacuation Procedure. The Emergency Response Plan and procedures consider the scenarios :-

- Catastrophic release of hydrogen cyanide from storage, process or regeneration facilities;
- Transportation accidents occurring on site or in close proximity to the operation;

-
- Cyanide releases during unloading and mixing;
 - Cyanide releases during fires and explosions;
 - Pipe, valve and tank ruptures;
 - Overtopping of ponds and impoundments;
 - Power outages and pump failures;
 - Uncontrolled seepage;
 - Failure of cyanide treatment, destruction or recovery systems; and
 - Failure of tailings impoundments and other cyanide facilities.

In addition to identifying applicable scenarios, the Plan and procedures establish specific, appropriate response actions, including clearing site personnel and potentially affected communities from the area of exposure.

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

X in full compliance with

The operation is ☐ in substantial compliance with **Standard of Practice 7.2**
☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

Emergency cyanide drills are used to raise awareness and facilitate discussions on the workforce Plan. Briefings and discussions on the Plan are held at the regular Health & Safety meetings. As part of the Mine ICMI Dialogue and Disclosure programs, presentations to potentially affected communities are delivered during community meetings and include appropriate emergency response information and details on the nature of their risks associated with accidental cyanide releases.

Emergency drill reports confirm the involvement of the applicable site medical facilities and clinics in the emergency response. The operation is working closely with the local Gendarmerie (police) and Civil Defence on evacuation.

Standard of Practice 7.3: Designate appropriate personnel and commit necessary equipment and resources for emergency response.

X in full compliance with

The operation is ☐ in substantial compliance with **Standard of Practice 7.3**
☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

The Plan includes Section 5. Call-Out Procedure p 8, covers TSF and plant call-out procedure and flow diagrams. The included table details response coordinators, roles, and responsibilities. The Plan also includes a listing of the Emergency Response Team. Section 40, page 51, details the Training Needs for the Emergency Response Teams. Also included are call-out procedures

and 24-hour contact information for the coordinators and response team members. The Table in Section 5 details response coordinators and their roles and responsibilities. The Emergency Team Procedure for Cyanide Spill, includes the responsibilities in the case of a cyanide spill. Section 5.1 – Emergency Equipment Tools and Materials details an inventory of the emergency response equipment. The weekly emergency equipment inspection sheets were reviewed, covering the contents of the emergency cabinets and other required emergency equipment. The Cyanide Patient Evacuation procedure details roles and functions of external medical responders. The clinic doctor has liaised with Polyclinique Guindo in Bamako and confirmed that the facility can accept cyanide patients and has the necessary skills. The doctor also indicated that the hospital was able to perform blood cyanide tests.

Standard of Practice 7.4: Develop procedures for internal and external emergency notification and reporting.

X in full compliance with

The operation is ☐ in substantial compliance with **Standard of Practice 7.4**
☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

In the Plan, Section 5, it details, under roles and responsibilities, those of the General Manager: -
“... ”

General Manager:

- Provide all necessary support and assistance to the Health & Safety (H&S) Manager during an emergency.
 - Decides whether information should be released to the Media.
 - Communicates with the media, EXCO, the relevant regulatory body, etc., as may be required.
- “... ”

The Significant Cyanide Incident Notification to ICMI procedure outlines the actions required to report Significant Cyanide Incidents to ICMI, in accordance with ICMI-specific requirements, and includes the roles and responsibilities of the identified officials. There have been no such significant cyanide incidents on site since the last ICMI certification audit.

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.

X in full compliance with

The operation is ☐ in substantial compliance with **Standard of Practice 7.5**
☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

The Plan describes specific remediation and response measures in the following sections:-



Section 9. Accidental release of cyanide (small quantity) p 21
Section 10. Accidental release of cyanide (medium-large quantity) p 22-23
Section 21. Release of High Strength cyanide solutions p 33
Section 22. Release of low Strength cyanide solutions p 33
Section 23. Release of Cyanide during Dry Conditions p 34
Section 24. Release of Cyanide during Wet Conditions p 35
Section 25. Uncontrolled seepage of cyanide p 36
Section 26. Decontamination of a spill of solid/liquid cyanide into soil p 37
Section 27. Use of Calcium Hypochlorite for Decontamination Purposes p 39-42
Section 36. Response to Groundwater Pollution to minimise the impact on the Community p 47-49
Section 37. Response to Surface Water Pollution p 49-50
Section 38. Response to Soil Pollution p 50-51
The above-mentioned remediation activities are tailored to the specific scenarios. The principles are common to all, but the detail is scenario specific.
The Cyanide Sampling and Analyses Procedure covers the sampling of cyanide solutions in soils, surface and groundwater. Sampling locations of boreholes and surface streams are indicated on the sampling map included in the procedure. This would also be used in emergency conditions.

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

X in full compliance with

The operation is ☐ in substantial compliance with **Standard of Practice 7.6**
☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

Under the Plan's Section 40, TRAINING NEEDS FOR THE EMERGENCY RESPONSE TEAMS page 51, it states:-

"...

- The ERT (Emergency Response Team) will be testing the emergency response procedures by conducting regular mock drills for different scenarios and keep records.
- The ERT will be doing an evaluation, the drill outcome, and update procedures, if necessary..."

Cyanide Drills

1. **HCN Gassing, 10h30, 25th July 2022**, Cyanide make-up tank inside welding.

Scenario: - During cyanide make-up tank inside welding, solution spilled; HCN gas was generated and inhaled by the welder; who became unconscious.

Objective: - assess the effectiveness and efficiency of the Emergency Response Plan and cyanide ERT.

Weaknesses identified: - Cyanide first aid treatment was applied but very slowly (Corrective



action was to increase refresher frequency to quarterly and additional practical exercise carried out by the Reagent Supervisor), The outdated callout emergency response was still displayed (Corrective action – replaced with the latest version). Cyanide Emergency response spill process not well understood (Corrective action – additional spill response training conducted for all reagent operators), Key spill response equipment missing (Corrective action urgently replaced), HCN Gas detector found not calibrated (Corrective action – all HCN gas detectors at the Reagent area recalibrated), No 15 Safety Shower alarm not sounding (Corrective action-Alarm urgently fixed), poor housekeeping around the emergency room (corrective action-urgently cleaned up), and fade and corroded signs around emergency room (corrective action – all signs replaced) All corrective actions completed and closed out.

2. HCN Gassing, 11h00, 24th November 2023, Reagent Cyanide Handling.

Objective: - assess the effectiveness and efficiency of the Emergency Response Plan and cyanide ERT.

Strengths – Buddy immediately sounded the alarm when the operator collapsed, 2 operators dressed and stripped the victim at the safety shower,

Selected Weaknesses: - Reagent alarm faults (Corrective action – repaired and reset), make-up Area Safety shower defective and obstructed (Corrective action- safety shower repaired and obstructions removed), Reagent Emergency room air conditioner faulty (Corrective action – Air conditioner repaired). No security staff turned up at the scene (Corrective action – sensitisation training for security staff), contaminated full face mask transported with the victim (corrective action – refresher training on all contaminated PPE and clothes in plastic and sealed for destruction). All corrective actions completed and closed out.

3. Cyanide Splashing during valve repair, 11h30, 8 August 2024 , CIL (Cyanide Dosing Tank area).

Scenario: - During a valve repair on the cyanide-dosing tank, the fitter inadvertently received a splash of high-strength cyanide solution on his back

Objective: The main purpose was to assess the effectiveness and efficiency of the Emergency Response Plan.

Strengths: Workforce all reported to the assembly point promptly after hearing the alarm, the first aid procedure was clearly followed by the first aider, bystanders were kept clear, a first aider went to the plant airlock and escorted the medical team to the scene.

Weaknesses: - PVC suit was pierced, fitter did not inspect his PVC suit before work, the cyanide tank was almost full during maintenance. All corrective actions completed and closed out.

4. Cyanide Splashing during valve repair, 11h30, 8 August 2025. CIL (Cyanide Dosing Tank area).

Scenario: - During a valve repair on the cyanide-dosing tank, the fitter inadvertently received a splash of high-strength cyanide solution on his back.

Objective: The main purpose was to assess the effectiveness and efficiency of the Emergency Response Plan.

Strengths: Workforce all reported to the assembly point promptly after hearing the alarm, the first aid procedure was clearly followed by the first aider, bystanders were kept clear, a first aider went to the plant airlock and escorted the medical team to the scene.

Weaknesses: - PVC suit was pierced, fitter did not inspect his PVC suit before work, the cyanide tank was almost full during maintenance. All corrective actions completed and



closed out.

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.

X in full compliance with

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

Basis for this Finding/Deficiencies Identified:

Cyanide induction training includes:- cyanide first aid, cyanide awareness, cyanide appearance, different means of contamination, symptoms of cyanide poisoning, emergency response, oxygen administration, why using cyanide in the mine, how it is transported and how it is stored and protected. Refresher training is done annually on return from leave.

Induction training is tracked and recorded using a Training matrix, including site induction, which was sighted and reviewed. Coding: - Training Completed (TC), Training Not Needed (TNN), Training Needed (TN) Total staff on site – 220 Processing Employees, Contract Security, Paragon Contract TSF (54), and various other, Total number of people in the Plant – 570.

The tabs on the spreadsheet included in the Matrix for all sections trained in General Induction - training up to date were sighted. The training matrix induction results including cyanide first aid and cyanide awareness training test results for 2023 and 2025, including Paragon, Security, various Contractors, Process staff, and Engineering staff were sighted. The pass mark for the written exam is 80%. The training is repeated till the pass mark is achieved.

The Cyanide First Aid matrix with the scores (given to all plant employees, including emergency Responders) was sighted and reviewed. The successful employee receives a purple card confirming completion of first aid training.

Cyanide induction training records are retained for at least three years along with the trainer and the assessment score.

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.

X in full compliance with

The operation is ☐ in substantial compliance with **Standard of Practice 8.2**
☐ not in compliance with



Basis for this Finding/Deficiencies Identified:

For the Plant, the training matrix includes the training elements for each job in the training needs analyses, showing Training Needed (TN) per person. The Training matrix also includes operational task training. The Standard Operating Procedures (SOP) are used for task training. TSF contractor, Paragon, trains its staff in the tasks performed on the TSF using Safe Work Procedures (SWPs). The detailed training matrix, including all the tasks, as well as the training needs analyses was sighted. The training matrix includes all the procedures the staff need to be trained on, and indicates Training Completed (TC), Training Not Needed (TNN), Training Needed (TN)

The Trainers in the Plant, are Mr Bakary Togola - Training and Reagent Foreman - Training of Trainers' course, BSc English, and 25 years' experience in the mines. Ms Marie M Keita, is the Training Assistant and has a BA in Teaching, and 12 years' plant experience on the SCADA. At the TSF, Mr Johan Smit, relieving Site Manager with 11 years of experience in TSF operations, completed various TSF courses, and a Diploma in Mineral Processing.

Any new employee will receive induction, cyanide awareness , and Cyanide first aid, before being allowed on to the plant. Written tests are conducted requiring an 80% pass mark.. Once on the plant, he/she is given the necessary procedures, and receives on-the-job training from the Training Officer. PTOs (Planned Task Observations) are conducted on the operator by the Supervisor to declare him competent to do the job. Following the PTO finding him/her competent to do the job, he/she is allowed to perform the tasks without supervision.

A PTO schedule is in place. The Supervisors are required to do two PTOs per month, each, on every section. If a PTO identifies deficiencies, refresher training will be provided. A sample of PTOs undertaken on the Plant and TSF was sighted and reviewed.

Currently, task training competency checking is done using PTOs. Sample training files were reviewed, which indicated record keeping complied with Cyanide Code requirements.

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

X in full compliance with

The operation is

☐ in substantial compliance with Standard of Practice 8.3

☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

A surface Cyanide Emergency Response Team is in place, and the Team list was sighted electronically, including their Group, Section, Shifts, Badge, and Cell numbers. The Emergency Response Team (ERT) Training Matrix was also sighted. The Training title list for the emergency Team includes Emergency PPE Donning and Doffing, PTO and effectiveness training, cyanide decontamination, cyanide issue-based risk assessment, cyanide ERP training, cyanide SOP training, HAZCHEM spillage training, Confined space, Cyanide SDS training, Management of Change, cyanide First Aid, Basic Fire Fighting, Cyanide awareness training, Plant-Specific Induction.



The Emergency Response Training schedules for 2024 and 2025 were sighted and sampled. Topics included in the schedules are:- Plant Specific Induction, Cyanide Awareness Training, Cyanide First Aid, Cyanide Management of Change, Cyanide SDS Communication, Confined Space, Hazchem Spillage Training, Cyanide SOP Training, Cyanide Emergency Response Plan Training, Cyanide Issue-Based Risk Assessment, Cyanide Decontamination, Emergency Donning and Doffing. The identified target groups are all Emergency Team members, and all Plant Employees. External General First Aid training is refreshed every year, and Cyanide First Aid is refreshed every 6 Months. Emergency training has been conducted, and competency assessments were completed through the Trainer's and ERT Coordinator's observations. Attendance Registers for practical training sessions were sighted.

The local clinic on the Mine is involved in emergency drills and cyanide training, and no outside responders are used. Community discussions include briefings on the Cyanide Emergency Response process. Informal communication by the Medical Director with medical facilities has shown that Polyclinique Guindo, Bamako has a medical facility that has adequate, qualified staff, equipment and expertise to respond to cyanide exposures. A letter dated 17 December 2025 from Prof John Weru, Chief Medical Officer, The Aga Khan University Hospital, Nairobi, Kenya, indicating a willingness and the expertise to manage cases of cyanide poisoning was sighted. An undated letter from Dr Joseph Lelo of AMREF Flying Doctors, indicating a willingness and ability and expertise to air-evacuate cyanide poisoning patients to appropriate hospital facilities, was also sighted. The Cyanide Patient Evacuation Procedure was sighted and reviewed.

The Clinic doctor contacted Polyclinique Guindo in Bamako and confirmed that the facility was able to take cyanide patients. The doctor also indicated that the hospital could conduct blood-cyanide tests.

Principle 9. DIALOGUE AND DISCLOSURE: Engage in public consultation and disclosure.

Standard of Practice 9.1: Provide stakeholders the opportunity to communicate issues of concern.

X in full compliance with

The operation is

☐ in substantial compliance with **Standard of Practice 9.1**

☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

Key stakeholders identified were: the Prefect, The Mayor, Chief of villages, Youth representatives, women representatives, Government representatives, community, and union members. The mine has established a Community Development Plan. The purposes of the Plan is to establish good relations with the stakeholders, develop effective communications and establish a sound basis of community development. The Plan was reviewed and released in 2022 but has been in place since the mine commenced in 2005.



Communication forums include: Meetings, and local radio is used to broadcast meetings by the radio reporter. The local radio station is used, and every community meeting is used for interviews and is broadcast. The Minutes are all discussed in radio programmes.

Meetings include presentations, supported by a knowledgeable Metallurgist. Photographs taken of meetings and plant visits were viewed. The meetings included presentations, in French and the local languages, Malinke and Bambara, on the subject of the risk of cyanide. Meetings also include demonstrations of cyanide safety equipment. Pipeline communication meetings include informing the community that the pipeline contains dangerous chemicals and the risks associated with spills and pipeline breaches. Photos of a visit to the pipeline as part of the community and stakeholder dialogue were viewed. The mine has employed community members along the pipeline to conduct Pipeline Patrols to look for leaks and any damage to the pipeline. They also discourage damage and vandalism to the pipeline.

In the past, the main concerns raised regarding cyanide were based on ignorance and fear. The mine's efforts to correct misconceptions and present facts about its cyanide safety management have reassured the community that it is managing cyanide as safely as possible. There are now emergency response teams in the community that would be activated in the case of emergencies; these teams receive training.

The community has expressed satisfaction with the mine's operations. Cyanide awareness training is conducted during meetings. A flyer issued including the routes of entry, clinic address, emergency procedures in case of spill, symptoms, different cases of poisoning, contact telephone numbers, and the location of the mine was sighted. The leaflet was presented to meetings on 29 May 2025.

Community meetings are held monthly, and joint community/ cyanide meetings are held annually. The Mine tries to ensure that no cyanide is transported during the wet season to avoid anxiety regarding the trucks.

Issues raised include dust on roads during the dry season, impacts of construction work, land availability, and concerns about emergency response. At one stage, communities were worried about the aesthetics of growing dumps and structures, but this has diminished.

Standard of Practice 9.2: Make appropriate operational and environmental information regarding cyanide available to stakeholders.

X in full compliance with

The operation is

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

☐ not in compliance with

Basis for this Finding/Deficiencies Identified:

The literacy levels in the area are very low. Thus, Malinke and Bambara, the local languages, are used to present material prepared initially in French. Local Doctors also visit the Mine to gain more knowledge about cyanide and to attend refresher training. A flyer has been issued, including the cyanide routes of entry, clinic address, emergency procedures in case of spills or



releases, symptoms, different cases of poisoning, contact telephone numbers, and location of the mine.

The General Manager reports all incidents to the Regional Head Office in Bamako, and the Authorities, in the case of relevant incidents. All incidents are reported in the SharePoint system, which is available onsite. There have been no cyanide incidents or exposures since the last ICMI certification audit. The Malian Ministry of Environment investigates all relevant HSE incidents (including cyanide) on-site and also makes the information available publicly. Sighted the Barrick Sustainability report which states, "... Where our operations use cyanide we will ensure that our arrangements for the transport, storage, use and disposal of cyanide are in line with the standards of practice of the International Cyanide Management Code..".- Website address: <https://www.barrick.com/English/sustainability/environment/default.aspx>

