SUMMARY AUDIT REPORT

for the August 2022
International Cyanide Management Code Recertification Audit

Prepared for:
Tüprag Metal Madencilik Sanayi ve Ticaret A.Ş.
Eldorado Gold Corporation/ Kışladağ Gold Mine

Submitted to:
International Cyanide Management Institute
1400 "I" Street NW, Suite 550
Washington, D.C. 20005

Final
30 January 2023

Lambert Environmental

1040 Chamberlain Drive
North Vancouver, British Columbia, V7K 1N9, Canada

SUMMARY AUDIT REPORT

Name of Mine: Kışladağ Gold Mine

Name of Mine Owner: Eldorado Gold Corporation

Name of Mine Operator: Tüprag Metal Madencilik Sanayi ve Ticaret A.Ş. (Tüprag)

Name of Responsible Manager: Mr. Justin Kapla, General Manager

Address: Kışladağ Gold Mine
Tüprag Metal Madencilik San. ve Tic. A.Ş.
Gümüşkol Köyü Mevkii PK: 30
Ulubey, Uşak, Türkiye

Telephone: +90 276 413 00 00/201
Fax: +90 276 413 00 30

E-mail: justin.kapla@tuprag.com

Location detail and description of operation:

The Kışladağ Gold Mine is the largest operating gold mine in Türkiye. The mine is located in Uşak Province, on the western edge of the Anatolian Plateau between the major cities of İzmir, lying 180 kilometres (km) to the west on the Aegean coast, and the capital city of Ankara, 350 km to the northeast. The site is 35 km southwest of the provincial capital of Uşak, near the village of Gümüşkol and several other small villages. The site is situated at an elevation of approximately 1,000 m above sea level, in gently rolling topography. The climate in this region is arid with warm dry summers and mild wet winters. The average annual rainfall is 425 mm, most of which occurs during the winter months. The surrounding region is rural, characterized primarily by subsistence farming and grazing. Access to the mine is provided by a 5.3 km long paved mine access road, which connects to a paved regional highway between the towns of Ulubey and Eşme.

There are no permanent water bodies in the area and water supply is limited to ephemeral streams and shallow seasonal stock ponds. Water is supplied to the mine from various well fields with a capacity of approximately 280 m^3 per hour. A dam was constructed in partnership with the water authority in 2016 and is connected to the site to serve as an additional reservoir to support operations. The Turkish Electricity Distribution Corporation provides power to the site via two transmission lines from the Uşak industrial zone, 154 kilovolt (kV) (27.7km) and 34.5 kV (25km).

Kışladağ gold mine is an open pit mine and heap-leach operation. The ore is processed in a conventional heap leach facility which consists of a three-stage crushing plant. The third stage was replaced by a high-pressure grinding rolls circuit (HPGR) in October 2021. The crushed ore is conveyed to a leach pad via an overland conveyor system, mobile conveyors (grasshoppers), and a radial stacker for placing onto the leach pad.

The existing South Heap leach is a series of 23 cells, 80 m wide by 800 to 1,000 m long with a total size of approximately 1 km x 2.4 km, and constructed in 10 m lifts to a height of 120 m. Pad is a permanent facility employing a two-part liner system of a compacted layer of low permeability clay soil and a synthetic liner. Since 2019, the cells of the leach pad were covered with an Inter-lift liner and solution collection system to increase gold recovery and minimise the circulation time of solution. This Inter-lift Pad comprises 24 cells and is being constructed in 10 m lifts to a height of 30 m.

The ore is irrigated with cyanide solution and the solution is recovered and processed in an adsorption-desorption-regeneration (ADR) and electro-winning circuit to produce gold doré. In 2020 the Solid-to-Liquid System (SLS) cyanide mixing facility was relocated from the ADR to the leach-pad and the leach process modified to also apply reagent grade cyanide solution (curing) at the first three grasshoppers. Solution is managed using pregnant, intermediate, and barren solution ponds and ADR plant. The water management system includes several event ponds added as the leach pad expanded and designed to manage precipitation in excess of a 100-year, 24-hour storm event.

Facility changes since the 2019 International Cyanide Management Code (ICMC) recertification audit include the installation of two additional carbon columns (F&G); an SLS Container Filling Station (repacking) from bag-in-box to SLS isotainers, an Inter-lift-liner and collection system and ongoing placement of crushed ore to the Inter-lift Pad, process pond PRP-5 (~450,000m^3) for managing water balance, relocation of the SLS Mixing Facility and installation of a cyanide curing system, upgrade of three cyanide box delivery unloading ramps, relocation of booster pump higher on the leach pad, and replacement emergency shower stations. Construction of the liner has also begun for a new pad (North Leach Pad (NLP)) located 600 m north of the South Leach Pad.

Figure 1: Location of Kışladağ Mine, Türkiye

SUMMARY AUDIT REPORT

Auditors' Finding

The operation is: ■ in full compliance

in substantial compliance

not in compliance

with the *International Cyanide Management Code.*

This operation has not experienced any compliance issues during the previous three-year audit cycle.

Audit Company: **Lambert Environmental**
1040 Chamberlain Drive
North Vancouver, BC V7K 1N9

Audit Team Leader: John Lambert, EP(CEA)
e-mail: john.lambert@telus.net

Names and Signatures of Other Auditors

Technical Auditor: Ata Akcil, PhD
e-mail: ataakcil1@gmail.com

Date(s) of Audit: 15 August 2022 through 19 August 2022

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 Mining Operations Verification Protocol* and using standard and accepted practices for health, safety and environmental audits.

Kışladağ Gold Mine		30 January 2023
Name of Mine	Signature of Lead Auditor	Date

SUMMARY AUDIT REPORT

1. PRODUCTION **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 manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

At the time of the 2019 recertification audit Tüprag procured both boxed and solid to liquid system (SLS) forms of cyanide from CyPlus GmbH (CyPlus) in Wesseling, Germany, as well as boxed cyanide from Hebei Chengxin Co. Ltd (Hebei) in China, Tongsuh Petrochemical Corporation, Ltd (Tongsuh) in Korea, and Orica Australia Pty Ltd (Orica) in Western Australia.

Since the 2019 recertification audit Tüprag has purchased cyanide from CyPlus GmBH (CyPlus) in Wesseling, Germany, Hebei Chengxin Co. Ltd (Hebei) in China, Australian Gold Reagents Pty. Ltd. (AGR) in Kwinana, Western Australia, and Orica Australia Pty Ltd (Orica) in Western Australia. Shipments from Orica was discontinued in December 2020, and after Tüprag completed the construction of a Solid-to-Liquid (SLS) Container Filling Station also discontinued the receipt cyanide in SLS isotainers from CyPlus.

Review of the International Cyanide Management Institute (ICMI) website confirmed that Tüprag's cyanide suppliers over the past three years are all certified as being in full compliance with the Code.

2. TRANSPORTATION **Protect communities and the environment during cyanide transport.**

Standards 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.

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 2.1.

Summarize the basis for this Finding/Deficiencies Identified:

Records of cyanide shipments from each of the suppliers to the Kışladağ Gold Mine covering the past three years were reviewed to check that the transport companies and routes matched those documented with the certified supply chains between the various producers and the operation. The records showed that the road or rail transportation companies, ocean shippers, and ports of loading and unloading, concurred with the certified supply chains used by the suppliers. All identified transporters are individually certified in compliance under the Code or included in a certified supply chain.

3. HANDLING AND STORAGE **Protect workers and the environment during cyanide handling and storage.**

Standards of Practice

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 3.1.

Summarize the basis for this Finding/Deficiencies Identified:

Since the 2019 ICMC recertification audit there have been several changes to the delivery, storage, and handling of cyanide. Tüprag only receives cyanide as dry briquettes in Intermediate Bulk Container (IBC) bag-in-box delivery form and ceased receiving isotainers. Instead, an SLS Container Filling Station was constructed in the former SLS Cyanide Warehouse, and two isotainers were purchased, and a procedure implemented to load them with briquettes delivered in IBC boxes. The former SLS Mixing Plant was decommissioned at the ADR and relocated to the east side of the leach pad, to integrate the SLS mixing operation with a new cyanide curing process for the pad leaching operation. In addition to now housing the SLS Container Filling Station, the former SLS Warehouse is now also used to store IBC boxes. The current total cyanide storage capacity is 500 tonnes at the ADR Cyanide Warehouse, 850 tonnes at the New Cyanide Warehouse and 650 tonnes at the

former SLS Warehouse.

The offloading ramps for the cyanide warehouses have been upgraded since the last ICMC recertification audit. The ground surrounding the ramps have now been paved to provide additional safety for use of offloading equipment (forklift and manitou) and additional protection from potential spillage. Hydraulic rams have been installed on each ramp to facilitate the positioning of a steel connector floor between the ramp and container being unloaded, to provide additional safety during unloading.

Other than the above changes the existing mixing and storage facilities are still in use. The new facility designs were administered through Tüprag's Management of Change process and strict engineering construction monitoring and sign-off were undertaken to ensure all construction was in accordance with cyanide producers' guidelines, applicable jurisdictional rules and/or other sound and accepted engineering practices.

The mine is located several kilometres from the nearest residencies and all unloading, storage and mix facilities, including the changes noted above, are located several hundred metres from the mine's administration buildings. All facilities have been designed so that cyanide releases would report to the solution or stormwater ponds and not be released to surface water.

All cyanide mixing and storage tanks are located within concrete containments designed to contain greater than 110% of the largest tank volume and to prevent seepage to the subsurface. The concrete containments were observed to be in good condition and provide a competent barrier to leakage. All cyanide mixing and storage tanks are fitted with tank level indicators and high-level alarms that can be monitored from the central control room at the ADR facility and SLS Mixing Facility control station. The level indicators and alarms are on a six-month preventative maintenance schedule and operating procedures require the tank levels to be checked prior to mixing operations to ensure enough capacity is available in the tank to safely conduct the mix.

To prevent contact with water the IBC boxes of cyanide are stored on concrete floors in the dedicated warehouse buildings, away from incompatible materials. The cyanide warehouses are roofed and enclosed to prevent water access. The walls are fitted with louvered ventilation panels that provide natural ventilation. Entry to the cyanide warehouses is restricted to authorized personnel. They are locked when cyanide is not being handled and are surrounded by perimeter security fencing, locked gates, and monitored 24/7 by security cameras.

The cyanide mix and storage areas at the ADR are under a roof but otherwise open to the atmosphere. The new SLS Mixing Facility is roofed but well ventilated with louvered walls and an open truck bay area where the SLS mixing operation is undertaken. All facilities have been designed so that cyanide releases would report to the solution or stormwater

ponds and not be released to surface water.

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.

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 3.2.

Summarize the basis for this Finding/Deficiencies Identified:

All non-returnable IBC boxes and associated bags and used personal protective equipment (PPE) coveralls are collected and stored in dedicated containers prior to being disposed (incinerated) at a licenced hazardous facility. Since the 2019 Tüprag no longer triple rinses empty cyanide bags but decided to return to a previous procedure of folding the dry empty cut bags and placing them into a dedicated plastic waste barrel prior to disposal as hazardous waste because of problems they were having with clogging jets and hazards associated with handling the wet bags when triple rinsing. Boxes supplied by CyPlus are designed to be knocked down and returned for re-use. The boxes are carefully inspected on delivery and before and after use to ensure they are free of residue.

Plans or procedures are in place to prevent exposures and releases during cyanide unloading and mixing activities. These include procedures for safe transport and unloading of shipping containers, unpacking of shipping containers and storage of cyanide boxes, filling isotainers with box cyanide, cyanide mixing and handling, disposal of waste boxes and bags, return of recyclable boxes, and sparging of SLS isotainers. Each unloading area is concrete paved, and drainage is directed to one of the storm water or solution ponds. The procedures include requirements for PPE, checking for potential Hydrogen Cyanide (HCN) gas, and addition of synthetic colourant dye to assist with identification of potential reagent leaks. Stacking of individual cyanide boxes within the warehouses is limited to three high, well within the maximum loading capacity of the wooden boxes. Spill kits are stationed at the ADR and each of the cyanide storage locations in the event of a spill in the cyanide warehouses. During mixing, spillage of solution would flow via drainage channels to one of the solution ponds.

The cyanide mix procedures stipulate PPE requirements (full Tyvek coveralls, chemical gloves and boots, full-face respirator and portable HCN meter) and requires operators to inspect their respirator and filters prior to starting a mix. The procedures require a minimum of two operators in full PPE during the mix. In addition, mixes are remotely monitored by the control room during via video camera.

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

Standards of Practice

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 4.1.

Summarize the basis for this Finding/Deficiencies Identified:

Tüprag has a well-established environmental and occupational health and safety management system (EHSMS) that complies with International Organization for Standardization (ISO) 14001 and 45001 systems. The mine was recertified to these systems in December 2021. In 2021, Eldorado Gold developed a Sustainability Integrated Management System (SIMS) which sets common sustainability standards for all Eldorado Gold operations. The SIMS aligns with internationally recognized voluntary standards including ICMC. Tüprag is currently adapting its EMS to conform with the corporate SIMS initiative. Within the EHSMS the Cyanide Management Plan (CMP) provides a detailed description of Tüprag's ICMC compliance program. The plan was last updated in January 2022 and is supported by the Kışladağ Emergency & Crisis Management Plan (ECMP). The current version of the CMP provides general information on cyanide chemistry, toxicity, and safety handling, and establishes overall requirements for:

- cyanide procurement and transport,
- cyanide unloading, handling, and storage (for both bag-in box cyanide),
- filling of SLS isotainers with bag-in-box cyanide,
- cyanide mixing operations (bag-in-box, and SLS mixing,
- management of leach pad construction, ore placement, and placement of leach solution driplines,
- cyanide curing and application to leach pad,
- leach pad leak detection monitoring,
- management of solution collection trenches and pipelines,
- management of pregnant, barren, and intermediate solution ponds,
- management of stormwater event ponds,
- decommissioning considerations,
- health and safety,
- risk assessment,
- preventive maintenance,
- training and planned task observation (PTO) program,
- dialog with external stakeholders; and

- emergency preparedness and crisis management.

Tüprag's heap-leach operations continue to be conducted in compliance with the CMP, the technical guidance provided in final phase-specific design reports, and by regular review of the site water balance. Procedures are also in place to mitigate ponding on the leach pad and to monitor for potential liner leakage of the pad and ponds. The ADR operations are also managed in accordance with a suite of standard operating procedures based on the Safe Work Procedures.

As noted in the previous certification audit reports, all operational assumptions, and parameters (including required freeboard in the solution, stormwater, and event ponds) are documented in phase-specific design reports for the heap leach pad and the site's water balance model. The Weak Acid Dissociable (WAD) cyanide concentrations in solutions held in solution ponds and applied to the leach pad exceed 50 mg/l, and protective measures and operations procedures have been implemented (bird balls and fencing) to prevent the access of birds and wildlife to these solutions. Kışladağ is a heap leach operation and does not use mill based mineral extraction and tailings technology.

The new SLS Container Filling Station has been designed with a wet scrubber system to prevent potential release of cyanide dust during the loading operation and procedures are in place for operating and maintaining the scrubber. Because the cyanide curing system handles reagent strength cyanide piped from the SLS Mixing Facility, the operating procedures include checking curing lines and manholes for potential solution leakage. Safety procedures are also in place that prohibit workers entering the curing area without approval. Safety systems are also in place whereby the curing lines automatically flush if there is an equipment stoppage.

The operation continues to inspect cyanide facilities on an established frequency sufficient to assure and document that they are functioning within design parameters. Documented inspections are conducted each shift. These inspections address key aspects of ADR operations including signs of potential leakage of tanks, piping and pumps; salt build-up; adequacy of bird ball coverage on solution ponds; integrity of netting on leach pad collection basins; integrity of hydrogen peroxide dosing system; cracks in containments, shower/eyewash operation, and condition/adequacy of signage. Documented daily inspections are also conducted to manage and eliminate ponding on the leach pads, monitor leach pad leak detection ports, and solution ponds levels and other aspects of cyanide management. Also, the Health, Safety and Security (HSS) Department conducts routine documented inspections of all cyanide facilities at least monthly, and the Environmental Department conducts semi-annual integrity inspections of surface water diversion channels, constructed to prevent stormwater run-on to the leach pad. In addition, preventative maintenance (PM) routine inspections of critical equipment are undertaken on pumps, power generators, safety showers and instrumentation to ensure they operate reliably as designed.

Inspection practices are substantially the same as were in place during the 2019 recertification audit. Daily and Shift inspections are recorded on specific operator sheets that include inspection date, the name or initials of the operator or supervisor, and note any specific actions required because of the inspection. Repairs, maintenance, or other corrective actions are reviewed in the next day's planning meeting and specific PM actions initiated where appropriate. Any observed deficiencies that have potential health and safety or environmental impacts prompt the generation of an occupational health and safety incident or a corrective action report that includes the date, identifies the issue, and summarizes the corrective/preventive action required. These actions are tracked to completion electronically on INX Software (INX) management system. Monthly reports are generated and distributed to department heads that include information on the number of open and closed action items.

The adequacy of the frequency of these inspection and maintenance programs was evident during the site audit through the observed good housekeeping, and except for noted two instances, the clean and well-maintained appearance of equipment, signage and containment structures. The two exceptions related to observed heavy corrosion on the sidewalls and bases of tanks in Carbon-in-Column (CIC) Train A and the old cyanide mix tank. At the time of the field audit Train A was not in service but we understand may be used as back-up if needed in the future. The old cyanide mix tank is seldom used, and maintenance had been scheduled. Nevertheless, Tüprag was requested to provide a report on the integrity of these tanks and conduct any required maintenance to ensure they function within design parameters if their use is to be continued.

Subsequent to the field component of the audit Tüprag provided evidence that the mix tank and had been refurbished and repainted. Tüprag retained SVS Consultancy Engineering to perform an evaluation of Train A and provide recommendations. The evaluation report identified significant corrosion and laminated conditions impacting the integrity of the plant and recommended that Train A be decommissioned without further utilization.
As Train A had already been scheduled to be decommissioned in early 2023 after the new NLP comes online Tüprag decided to bring forward the decommissioning of Train A by 5 or 6 months and utilize Train B as back up instead. The area around Train A was subsequently closed and barricaded.

Tüprag has a Change Management Procedure to evaluate the environmental and safety impacts of new or modified processes, equipment, or materials. The proposed change is documented and routed to the HSS Manager and Environmental Manager for review and approval prior to the implementation. The procedure applies in addition to the Authorization for Expenditure (AFE) process, which is required for major capital expenditures that must be conducted outside of regular annual budgets, as well as any other change, regardless of monetary value. Since the last ICMC recertification audit, the procedure has been applied to 36 cyanide management infrastructure improvements.

The CMP addresses procedures in the event of a temporary shutdown. Specific procedural guidelines have been developed that document planned responses to non-emergency temporary shutdown needs, including shutdown for economic reasons, or as required in response to a regulatory action or the routine recovery from a water balance upset from prolonged rains and prolonged drought. Prior to startup after a temporary shutdown the relevant departments will meet to ensure that the necessary measures are implemented for active recommissioning. When a shutdown extends more than one-month employees will be required to attend health, safety and environmental induction training before operations are restarted. In situations where a shutdown could extend for many months closure procedures would follow the procedures set out in the site closure plan.

CMP addresses contingency actions in response to a variety of emergency/non-emergency scenarios, including:

- Hydrogen cyanide gas leak,
- Transportation accidents,
- Leak during unloading, mixing and preparation,
- Leak because of explosion or fire,
- Pipe, valve, or tank leaks,
- Overflows in ponds or solution limiting areas,
- Power cuts and pump failures,
- Uncontrolled leaks,
- Other emergencies that may occur in heap leach or other cyanide plants.

Depending on the severity of the incident these actions may require the implementation of the ECMP.

In situations where there is an upset in the water balance from severe weather conditions or other cause resulting in a potential for pond overflow, Tüprag has procedures in place to direct solution to Pond SWP-1 and activate the hydrogen peroxide dosing system to neutralize cyanide solution if discharge to surface water is necessary. With the installation of Pond PRP-5, Tüprag has also added significant leach pad drawdown and storm water retention capacity in the event of severe weather conditions and power cuts.

Tüprag continues using the Systeme, Anwendungen und Produkte in der datenverarbeitung (SAP) software for managing the preventative and corrective maintenance. The only significant change in the past three years is the merger of the process maintenance and mobile maintenance into a centralized system to provide better maintenance planning and resource sharing. The PM system addresses major machinery, tanks, pumps, valves, and other equipment associated with the management of cyanide (the exception being the fixed and hand-held HCN monitor calibrations, which are managed directly by the HSS department) as well as sensors, alarm systems operation, electrical wiring integrity, connection of the alarms to the (Supervisory Control and Data Acquisition) SCADA, and non-

destructive testing programs for tanks, piping and pumps.

The SAP system generates PM actions based on a predetermined maintenance schedule, or upon generation of Work Orders (WOs) in daily response to specific inspection observations or observed operational needs. WOs generated from the SAP system can be supported with substantial annotations, sketches or photographs, or other procedural detail for proper performance of the required work. WOs are generated by the maintenance planner and passed onto the maintenance supervisor who attaches relevant Job Safety Analysis (JSA) procedures for the required maintenance tasks prior to issuing the work order to the maintenance crew. The WO cover page on all cyanide related maintenance work to include a specific JSA for cyanide hazards. Records maintained with SAP are available since the startup of operations in 2004.

The Kışladağ Gold Mine is connected to the national grid via a local substation that reduces the supply from 154 kV down to 34.5 kV and 400 Volt (V). Tüprag indicates that this power supply is stable and reliable. At the time of the 2019 ICMC recertification audit, there were six 1,600-kilovolt Ampere (kVA) diesel generator sets onsite dedicated to the backup operation of major pumps and other key infrastructure associated with the heap leach pad and ADR. Three of these gensets are located just north of the solution ponds; the other three sets are installed adjacent to the ADR. In 2021 a seventh genset, also a 1,600-kVA diesel, was installed immediately south of the new F-G carbon column plant located just west of Pond PRP-1. We understand that only three gensets are required to operate the leach pad and ADR. With seven gensets now on standby Tüprag has considerable reserve backup power to deal with a power-outage emergency. The genset maintenance are included within the mine's PM system. In addition to routine mechanical inspections, the gensets undergo monthly load and unload testing.

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

The operation is: ■ in full compliance
in substantial compliance
not in compliance…with Standard of Practice 4.2.

Summarize the basis for this Finding/Deficiencies Identified:

This standard of practice is not applicable, as the Kışladağ Gold Mine is strictly a heap leach operation and does not use mill-based mineral extraction technology.

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

The operation is: ■ in full compliance

in substantial compliance
not in compliance…with Standard of Practice 4.3.

Summarize the basis for this Finding/Deficiencies Identified:

Tüprag continues to use the water balance described in the 2016 audit report. As noted in previous audit report, The Mines Group, Reno, Nevada, USA, (the designer of the heap leach facility) was contracted to develop the water balance and to provide liaison support for the maintenance of the water balance and ongoing operational guidance and technical support for emergency or contingency situations. The water balance is constructed using Excel™ software and is used for site wide water balance management. The Environmental Department reviews and updates model monthly and reports any extreme situations to the relevant Process and/or Mining Departments and General Manager. The model is a deterministic water balance for use as an operational water management tool to predict and manage the risk of potential discharge. Among other factors, the model specifically considers solution application rates, precipitation infiltration rates, evapotranspiration rates, and potential power outages. Freezing and thawing impacts were not considered appropriate in the development of the model, as although the site has experienced snow and freezing temperatures, there has never been a snowpack with a duration greater than 30 days and a spring snowmelt event has never occurred.

A stochastic version of the model has been discussed but has not been developed. However, the current deterministic version of the model can integrate frequency distributions for precipitation, and hence, may be considered "probabilistic" in the sense intended by this standard of practice. The water balance model has features that permits Tüprag to quickly quantify the risk of overtopping the lined pond systems (and potentially releasing process solution to the environment over the emergency spillway) or of running out of makeup water.

Excluding any available capacity provided by the ADR process ponds the recent construction of Pond PRP-5 has increased its total stormwater capacity to 946,000 m^3. To conservatively accommodate the volume of run-off from a 100-year 24-hour design storm event plus 24-hour drain-down and assuming no capacity is available in the ADR ponds, Tüprag's goal is to retain an available pond capacity of 361,000 m^3 to prevent possible discharge to the environment during such a worst-case event.

Weekly available pond capacity records covering the period February 2021 through August 2022 show that except for a six-week period between March and mid-April 2022 Tüprag maintained greater than the desired capacity. During this period the available capacity dropped to 294,460 m^3 or 82% or the desired available pond capacity. Tüprag indicated that the increase in solution storage and resulting decrease in available storage capacity between March and mid-April 2022 was a consequence of an intermediate leaching trial performed by the Process Department performed. As an outcome of the trial, the management team decided to stop the intermediate leaching trial and, in the future, not to undertake

intermediate leaching during the wet season. It is noted that in the event of a power outage Tüprag has back-up power generation. Also, if discharge were required Tüprag would active the peroxide dosing plant to treat water before to discharge to the environment.

Tüprag is in the advanced stage of development and implementation of a site wide GoldSim water balance. At the time of the audit the model calibration was near completion and training of designated personnel is being planned to allow the model to be managed internally.

The solution and stormwater pond system for management of the ADR and leach pad is the same as was in place during the 2019 ICMC recertification audit except for the recently constructed Pond PRP-5 that provides an additional 448,986 m^3 stormwater retention capacity. With exception of Pond PRP-5 all ponds are designed with 1 m freeboard above the design capacity and are operated to maintain a volume adequate to retain a 100-year, 24-hour design storm event, as well as the potential for drain-down from a 24-hour power loss. Pond PRP-5 was constructed as an extra precaution so there is no water management calculation applied for this pond. To monitor against overtopping the solution pond freeboard is recorded by operators each shift and pond levels are measured by the Mine Surveyors monthly and used to calculate the pond volumes which are then entered into the water balance model. The free board of the event ponds are also monitored monthly by the Environmental Department.

Precipitation and evaporation data are collected daily from the onsite meteorological station located just north of the mine pit. This data is input to the water balance model using the operational monitoring tool included as a tab in the Excel™ water balance model. This allows Tüprag to assess the risk of overtopping the lined pond systems and supports decisions to make specific operational adjustments. The meteorological station CR-1000 unit and sensors are sent to the State Meteorological Calibration Centre based in Ankara for calibration every 2 years.

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 4.4.

Summarize the basis for this Finding/Deficiencies Identified:

Wildlife access prevention measures are essentially identical to those in effect in the 2019 certification audit. The entire Kışladağ operation is surrounded by a well-maintained security fence designed to prevent ingress by livestock. Secondary chain-link fencing is also installed around the perimeter of the pond areas including the recently constructed Pond PRP-5. Tüprag continues to maintain a series of solution, stormwater, and event ponds located along

the western side of the leach pad. Each pond is separately fenced and those ponds which have (or could potentially have) solution concentrations of WAD Cyanide greater than 50 mg/l are provided with bird balls. At the time of the site visit Tüprag is in the process of placing bird balls into Pond PRP-3 and has plans to also place bird balls into Pond PRP-5 by end of the year. This will allow these ponds to be used to manage pregnant solution from the leach pad.

Small open concrete and high-density polyethylene (HDPE) lined collection basins for the leach pad and new Inter-lift Pad have been constructed at intervals to facilitate the collection of pregnant solution from each cell. Solution accumulating in these collection basins is routed through a concrete header to a pipeline that drains to the pregnant solution retention pond. Because pregnant solution concentrations are greater than 50 mg/l WAD cyanide, these small open solution basins are covered with bird netting with a local cutout to permit routine dip sampling of solution at each cell. All netting was observed to be in place and protective of wildlife.

Workers are trained report all wildlife mortalities immediately to the Environmental Department as part of induction training and receive periodic refresher training during toolbox meetings. In the past three years Tüprag recorded 13 wildlife mortalities; none of which occurred in the vicinity of the ADR or leach pads and could be attributed to cyanide. Given the presence of significant bird populations observed in and around the ADR area and Pond SWP-1, the records suggest that the measures taken to protect birds, other wildlife, and livestock from the adverse effects of cyanide are generally effective.

A procedure is in place to minimize occurrence of ponding on the top of the leach pad. Except on the side-slopes the emitters are buried to minimize the potential for evaporation loss and ponding; no spray emitters are used. The leach pad cell irrigation is managed to allow switching of active irrigation areas to prevent ponding without the need to reduce total flow of barren solution pumped to the pad. Since the 2019 ICMC recertification audit Tüprag designed and fabricated an emitter installation attachment for towing behind a D6 Dozer that ploughs and buries emitter lines. The attachment enables five lines of emitters to be placed to a depth of approximately 0.3 m below the surface. This installation method further reduces the potential for surface ponding. Active irrigation areas were inspected, and no notable surface ponding was observed. In addition to ponding management activities, Tüprag has five bird scarer units that can be utilized as needed.

To accelerate leaching, Tüprag now uses a cyanide curing system which entails slowly spraying reagent strength cyanide at the first three grasshopper and barren solution on subsequent grasshoppers prior to the ore being placed. The process is carefully monitored to prevent dripping or ponding of solution under the hoppers.

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

The operation is: ■ in full compliance
in substantial compliance
not in compliance…with Standard of Practice 4.5.

Summarize the basis for this Finding/Deficiencies Identified:

The Kışladağ process circuit is designed and operated as a closed circuit with zero discharge to surface and groundwater. Nevertheless, Tüprag conducts monthly water quality monitoring for the mine site including a station downstream of the heap leach pad, ADR, and solution ponds. Samples are collected monthly by Dokuz Eylül University Geology Department (DEU) and selected samples are sent to the Analytical Laboratory Services (ALS) in Vancouver and to DEU's laboratory for Total and WAD cyanide analysis. Water quality standards for the mine are currently regulated under Classes I through IV of the 2004 *Water Pollution Control Regulation* in which the strictest standard is Class I in which the Total Cyanide limit of 0.05 mg/l for protection of drinking water and aquatic life. Based on review of monitoring results, Total cyanide meets this strictest standard. The results for 2019 to date show that WAD cyanide concentrations have consistently been below the detection limit of 0.005 mg/l, indicating that there are no direct or indirect discharges to surface water where free cyanide concentrations exceed 0.005 mg/l.

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

The operation is: ■ in full compliance
in substantial compliance
not in compliance…with Standard of Practice 4.6.

Summarize the basis for this Finding/Deficiencies Identified:

The solution management and seepage control systems established to protect groundwater noted in the 2019 ICMC recertification audit are still in effect. In addition, solution management and seepage control systems have been established for the new SLS Container Filling Station, SLS Mixing Facility, Train F-G facility, and Pond PRP-5.

As noted in the 2019 recertification audit report, the South Leach pad is constructed with a synthetic 2 mm thick linear low-density polyethylene (LLDPE) liner over a 0.3 m (0.5 m for Phase IV, V, and VI) compacted low-permeability clay layer. During Phase V and VI construction a geosynthetic clay liner (GCL) was also used below the compacted clay liner. A leak detection system is installed between the clay layer or GCL liner and the synthetic liner under all Phases of the leach pad and the Inter-lift pad. The leak detection system for the leach pad is monitored each shift. In addition, monitoring wells are employed to monitor the integrity of the leach pad. The ponds are double lined using 1.5 mm thick HDPE liner

separated by a geonet leak detection system.

The original ADR plant and Train A-B-C is constructed with a concrete floor and stem walls and any spillage spillage within the ADR not captured in local sumps is directed towards Pond BSP-1. Train D-E on the east of Pond ISP-1 is constructed within a concrete containment basin with secondary barriers on three sides and a base slope that directs any leakage toward Pond ISP-1. The new Train F-G is constructed over a HDPE geomembrane within a concrete containment basin that drains vis a concrete conduit to Pond PRP-1. Pond PRP-5 like the other process ponds is double-lined and constructed 1.5 mm thick HDPE liner separated by a geonet leak detection system.

The SLS Container Filling Station has a reinforced concrete floor that is underlain by a HDPE geomembrane. Although only dry cyanide is handled in this plant, a pipe-in-pipe drain connects to the barren solution pond if potential drainage of washdown water or other solution is required.

Tüprag has installed groundwater monitoring wells at seven locations around the leach pad and ADR, two of which had to be relocated in February 2021 to outside of the footprint of Pond PRP-5 prior to construction of this pond. The original location of the monitoring wells and the design of the monitoring program were supervised by Hasan Yazicigil, professor of hydrogeology at Middle East Technical University in Ankara and forms the basis for the monitoring program approved by the Government.

Groundwater samples are collected monthly from each of the wells. The sampling is undertaken by DEU and the samples analyzed by ALS and DEU. In addition, the Environmental Department collects samples for Total cyanide and WAD cyanide every two weeks, in conjunction with the Inspection and Monitoring Committee formed by the Uşak City Governor. Based on review of monitoring results covering the period 2019 to date, Total cyanide in groundwater meets the strictest standard (Class I) for protection of drinking water and aquatic life. The results also show that WAD cyanide concentrations have consistency been below the detection limit during this period. Remedial activity has therefore not been warranted.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 4.7.

Summarize the basis for this Finding/Deficiencies Identified:

Spill prevention or containment measures are provided for all cyanide process tanks and

solution piping. The cyanide mixing, storage, and process tanks, and piping for Train A-B-C are located within the footprint of the ADR concrete secondary containment area, interconnected with concrete floor drains and HDPE lined solution pipeline corridors. Separate concrete containments are provided for the storage tank and offloading apron for Train D-E, and Train F-G. Concrete containment is also provided for the cyanide holding tank at the new SLS Mixing Facility. Any spill during SLS mixing reports to a sump located in the truck bay that reports to the storage tank containment basin by an automatic sump pump from where it is pumped to the holding tank. The cyanide storage warehouses have concrete floors, and the warehouse forecourts and off-loading delivery ramps are also concrete paved. These concreted areas drain to the one of the process ponds in the event of a spill.

As reported in the 2019 ICMC recertification audit, the total available containment for cyanide facilities within the original ADR footprint is greater than 110% of the largest contained tank volume. The new cyanide mix tank is located within a dedicated concrete containment greater than 110% of the tank. The acid storage, neutralization, and wash tank are located within a separate containment. The cyanide mixing and storage tanks, the carbon strip vessel and tank area, and the acid storage, neutralization, and wash tank areas are all under roof. Precipitation collected in the open-air Train A-B-C of the ADR containment reports to a concrete sump that drains (or can be pumped) to the barren solution pond (BSP-1). Train D-E and Train F-G drain to process ponds that provide containment in excess of 110% of the largest tanks and any precipitation within the CIC columns.

The new SLS Mixing Facility has been constructed within the leach pad containment area as well as being constructed with a concrete pad foundation. The facilities cyanide holding tank is located within a dedicated concrete containment basin which provides over 110% the capacity of a maximum possible leak from the tank. The cyanide storage warehouses only house dry cyanide. The warehouses all have concrete floors, and the warehouse forecourts and off-loading delivery ramps are also concrete paved. These concreted areas drain to the one of the process ponds in the event of a spill.

As discussed above, process areas that use cyanide are all provided with secondary containment to prevent cyanide releases to the environment, and either drain to process ponds or to sumps that are fitted with automatic pumps to return solution to the process. Leak detection systems are provided for all solution ponds and stormwater ponds and are checked on a daily and weekly basis respectively. Transfer pipelines between the pregnant, barren, stormwater, and event ponds are located within HDPE-lined trenches, pipe-in-pipe connections, or concrete channels. Pregnant and barren solution pipelines are contained within the heap leach containment liner, and between the ADR complex and the leach pad are placed within an HDPE-lined trench.

The only surface water features down gradient of the ADR, leach pad, process pipelines, and solution ponds are ephemeral streams that may exist for short periods of time in the spring.

In the low probability of a pond overtopping emergency, a concrete collection trench and spillway arrangement is in place and an active hydrogen peroxide dosing system is maintained to neutralize any residual cyanide prior to permitting emergency discharge through the spillway. The quality of the peroxide is checked annually and operator training in the dosing procedure is undertaken every year to ensure readiness and effective response if discharge through the spillway was ever required. All cyanide pipelines are provided with containment in the event of a potential leak and the potential for impact of a surface water channel is therefore considered low.

As noted in the 2019 ICMC recertification report, all cyanide mixing, storage, and solution tanks are constructed from carbon steel, and cyanide solution pipelines and piping system components are constructed of HDPE, stainless steel, carbon steel; both materials are compatible with cyanide and high pH conditions. The cyanide facilities constructed since the last audit include the Train F-G Carbon Column Plant, SLS Mixing Facility and associated cyanide curing pipeline system, SLS Container Filling Station, Pond PRP-5, and the Inter-lift Pad and associated piping. These facilities are also constructed from materials compatible with cyanide including stainless steel, carbon steel, HDPE piping and thermally welded HDPE liner.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 4.8.

Summarize the basis for this Finding/Deficiencies Identified:

As of the 2019 ICMC recertification audit Tüprag had completed the final (Phase V and VI) expansion of the leach pad system. The final inspection results for Phase V/VI, including test reports and construction photographs for this construction, are compiled in bound reports, and are retained on file with all previous engineer and quality assurance/quality control (QA/QC) documentation for the leach pad, ponds and ADR construction.

QA/QC programs have been implemented for all new construction. Since the 2019 ICMC recertification audit the following engineering construction projects have been undertaken:

- Carbon Column Trains F-G,
- Solution Pond PRP-5,
- SLS Container Filling Plant,
- SLS Mixing Facility and Cyanide Curing System, and
- Construction of Inter-Lift pad (Phase VII).

Review of engineering records for construction completed since 2019 indicate QA/QC programs were also in place to confirm the suitability of materials used in construction of cyanide facilities and the adequacy of installation. The records include as-build drawings and QA/QC records signed by appropriately qualified persons indicating that the facilities have been built as proposed and approved.

Engineering and QA/QC records are stored in an archive library maintained in a shipping container located at the old construction yard. Records of recent construction are currently held in the Construction Operations office prior to archiving.

As referenced in the 2019 ICMC recertification audit, engineering construction and QA/QC records were not available for the ADR Plant. Tüprag therefore invoked the option provided by this standard of practice and conducted an independent engineering review of the original ADR (Columns A, B and C and associated facilities). This review was conducted by Ümit Ekinci of CH Engineering and Consultancy Co. and was completed prior to the 2013 certification audit report. This documentation remains on file with the other archived engineering and QA/QC records.

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 4.9.

Summarize the basis for this Finding/Deficiencies Identified:

Tüprag has a written water quality monitoring procedure for undertaking quality monitoring in accordance with Environmental Impact Assessment (EIA) commitments, the Turkish Water Pollution Control Regulation (2004); the regulation on Protection of Underground Water against Pollution, (2012), and the regulation on Surface Water Quality (2012). The procedure sets out responsibilities; equipment; parameters to be monitored; monitoring locations, schedule, and methods; and reporting and file management requirements. They include maps showing the location of sampling points. Tüprag also has a wildlife mortality monitoring procedure that establishes responsibilities, monitoring locations, frequency, reporting procedures, and file management protocols. The procedure requires the ADR and heap leach areas to be monitored daily by the Process Department and monthly by the Environmental Department. All employees are required to report any mortality to the Environmental Department. In addition, interstitial monitoring is undertaken at solution ponds, event ponds and the heap leach liner to monitor for potential liner leakage.

The location and design of the original monitoring well installation was overseen by Hasan Yazıcıgil, Professor of Hydrogeology at the Middle East Technical University in Ankara. He continues to provide advisory services to Tüprag on an as-needed basis. The water quality

monitoring procedure was designed by Ms. Gülden Yüksel, an environmental engineering and Master's degree graduate, and Tüprag's former Environmental Manager. The position is currently headed by Mr. Nurullah Yiğit who received his environmental engineering bachelor's degree in 2005 and has since worked in the environmental field in the mining industry. As Environmental Superintendent he is responsible for managing the environmental programs, preparing environmental reports for submission to the Turkish Government, and reviewing and updating environmental procedures as needed. He is supported by Environmental Technicians that hold current certificates in "Water and Wastewater Sampling Training" with the Ministry of Environmental Impact. These certifications are required to be renewed every five years.

The water quality monitoring procedure details the sampling methods including purging monitoring wells, selection and labeling of sample containers, filtering and preservation of samples, and completion of laboratory request forms (Chain-of-Custody) and shipment instructions. The procedure specifies the parameters to be analyzed, the number QA/QC duplicate samples to be collected each month and the cyanide species to be analyzed. A filed sheet is used. Information recorded includes date of sampling, location, well purge data (temperature, conductivity, pH, volume pumped), weather conditions, visual characteristics of the sample, sampling device calibration date, and any anthropogenic influences that may impact sample quality.

Monitoring conducted at frequencies adequate to characterize the medium being monitored and to identify changes in a timely manner. Review of monitoring results from 2006 to date show cyanide concentrations have remained below 0.02 mg/l Total and WAD cyanide in surface water and groundwater. The monthly monitoring frequency is therefore considered adequate for characterize potential impact to surface or groundwater from cyanide operations. The daily leak detection monitoring frequency has allowed Tüprag to identify and address liner integrity issues in the ponds in a timely manner. The wildlife monitoring program also appears adequate as in the past three years Tüprag recorded 13 wildlife mortalities; none of which occurred in the vicinity of the ADR or leach pads and could be attributed to cyanide.

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

Standards of Practice

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

The operation is: ■ in full compliance
in substantial compliance

Kışladağ Gold Mine — Name of Mine
Signature of Lead Auditor
30 January 2023 — Date

not in compliance…with Standard of 5.1.

Summarize the basis for this Finding/Deficiencies Identified:

Reclamation planning is an integral part of the environmental impact assessment (EIA) process that must be implemented with each major leach pad expansion. An EIA was submitted in 2013 to support the Phase V/VI expansion. During this stage, the Government Forestry Directorate was responsible for review and approval of rehabilitation plan (which is included as Section 5 of the EIA in the format specified by the Forestry Directorate). As a result of this review, it was requested that annual reclamation plan updates be submitted to the local Forestry Directorate.

At the time of the 2019 ICMC recertification audit the latest decommissioning plan dated 2016. No significant changes to the heap leach operation occurred in 2017 and 2018 due to suspension of mining in 2018 through early 2019 and a feasibility study initiated in 2017. The Plan was subsequently updated and issued as *2020 Reclamation and Closure Evaluation*. This report presents conceptual procedures for decommissioning the ADR plant and processing facilities, and for flushing and regrading the heap leach facilities. Decommissioning and reclamation procedures include leach fluid management and stabilization; regrading and revegetation of the heap surface; management of solution ponds, which will be maintained open until the volume of fluid has been reduced to the level that will permit management via natural evapotranspiration; conversion of the solution ponds to zero-discharge evapotranspiration cells, and eventual closure of those cells; decontamination and closure of the ADR plant and SLS systems, cyanide warehouses, and associated infrastructure (including sale or transfer of decontaminated tanks and equipment); and sale of unused cyanide reagent stocks or return to the vendor. The Plan includes a conceptual schedule for implementing reclamation and closure of the mining operation and is supported by a cost estimate to fully fund third-party implementation by independent contractors. The Plan was updated in 2022 to evaluate and ensure compliance with jurisdictional requirements and Eldorado Gold SIMS requirements. The scope of reclamation and closure and the estimated cost remained unchanged from that provided in the *2020 Reclamation and Closure Evaluation*.

5.2 Establish an assurance mechanism capable of fully funding cyanide-related decommissioning activities.

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 5.2.

Summarize the basis for this Finding/Deficiencies Identified:

The latest available estimate cost to close and reclaim the site was prepared by Okane

Consultants, Saskatoon and is documented in report entitled *Kışladağ ARO Closure Cost Estimate – Update for Existing Conditions (as of December 15, 2021).* The estimate was based on the current closure plan outlined in the *2020 Reclamation and Closure Evaluation*. The cost estimate is based on all equipment and assets having no salvage value; a provision for supervision of the closure process is included; unit rates are based on third party contractor rates from recent construction projects, and a contingency value of 20% added to the total cost for closure.

As stated in the CMP Tüprag is committed to review the cost estimate for closure of the cyanide plants every five years, or whenever there are changes that will affecting the closure of the plants. In practice because the local Forestry Directorate has requested annual updates of the Closure and Reclamation Evaluation the cost estimate is reviewed more frequently. In addition, Eldorado conducts quarterly reviews of the Asset Recovery Obligations of all its projects, including Kışladağ.

Since 2013 Eldorado Gold has used a "self-insurance" type of financial assurance mechanism for the Kışladağ mining operation. The details of this financial assurance mechanism are consistent with the Canadian Generally Accepted Accounting Principles and are documented in corporate practice "*Internal Code for Self-Insurance of Decommissioning and Closure Liabilities*", dated 13 June 2022. Eldorado periodically engages KPMG (a Canadian limited liability partnership and a member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity) to conduct independent reviews and provide statements on Eldorado's financial strength to fulfil its obligations for cyanide-related decommissioning.

The latest review of Financial Information prepared in accordance with the Company's *Internal Code for Self-Insurance of Decommissioning and Closure Liabilities,* was undertaken by KMPG in 2022 and presented in a statement dated 9 August 2022. The statement is based on Eldorado's consolidated financial statements as of 31 December 2021 and the cyanide-specific decommissioning costs with the corresponding dollar amounts provided in the "December *2021* Okane Memorandum. KPMG agreed with the findings of each of specified auditing procedures used to demonstrate that Eldorado is in good financial standing and has substantial cash reserves to satisfy the ICMC requirements for self-insurance.

6. WORKER SAFETY Protect workers' health and safety from exposure to cyanide.

Standards of Practice

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

The operation is: ■ in full compliance
in substantial compliance

not in compliance…with Standard of Practice 6.1.

Summarize the basis for this Finding/Deficiencies Identified:

Tüprag has developed a CMP and an ECMP that describe the steps and procedures implemented at the Kışladağ Gold Mine for safe management of cyanide and cyanide related emergencies. The CMP which has remained in place since the 2019 audit (last revised in 2022) references Safe Working Procedures and Standard Operating Procedures in the form of Management Procedure Instructions, Non-procedure Instructions and job safety analysis (JSA) procedures for undertaking specific cyanide related tasks. The plan is applicable to all employees, contractors, visitors and service providers and references safe working procedures and standard operating procedures. Procedures have been maintained as controlled documents since 2019 as evidenced by the tracked revision updates recorded on procedures together with the date and approved sign-off for each revision by the Area Superintendent and Operation Manager.

Tüprag has mandatory workplace requirements for all employees and contractors. These include the use of safety goggles/glasses, safety footwear with toe protection, high visibility protective clothing, helmet, hearing protection, gloves and copy of the Golden Rules handbook. Operating procedures specify the PPE to be worn as well as other equipment required to safely undertake a task. Helmet, steel toed boots and safety goggles with side shields are required in all workplace areas at the mine site. There are also requirements detailed in operating procedures to wear additional items of personal protection as well as use of portable HCN meters when undertaking specific tasks or when working in specific areas where there is a risk of exposure to cyanide. PPE requirements are also posted in areas of the plant where specific PPE is required. Specific JSA and safe work procedures have been developed that detail step by step instructions for plant maintenance. These include requirements for decontamination of cyanide equipment/piping, by washing with water, with addition of caustic to raise pH as required, prior to maintenance.

Workplace inspections are undertaken at the start of each shift to check operation of shower/eyewash stations, integrity and operation of pipes, valves, tanks, secondary containments, and any signs of leakage. Pre-work inspections are conducted prior to cyanide unloading and mixing operations. These inspections include a visual inspection of PPE condition, and the proper operation of the forklift, SLS mixing apparatus and shower/eye wash stations. Pre-work inspections are also required as part of confined space entry, work permit requirements, and Job Hazard Assessment/Safe Working Procedures when undertaking non-routine tasks.

Employees are encouraged to seek ways to continually improve workplace safety; this ethic was observed during the audit with respect to workforce attitudes and general housekeeping practices. Worker input is obtained through formal workplace daily discussions (pre-shift discussions) between operators, supervisors, and managers. In addition to these casual discussions with their supervisors, there are several formal approaches for workers to

communicate and provide input into the development and evaluation of health and safety procedures.

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

The operation is: ■ in full compliance
in substantial compliance
not in compliance…with Standard of Practice 6.2.

Summarize the basis for this Finding/Deficiencies Identified:

The importance of maintaining appropriate pH within the leach circuit is described in the CMP. Tüprag have also developed a calculation for the quantity of caustic to be added to the leach circuit, depending on the supplied source of cyanide, and maintains pH above 12 during cyanide mixing as required under the procedure of Sodium Cyanide Solution Preparation. To prevent the generation of HCN gas and optimize the efficiency of the sodium cyanide in the leach process, Tüprag maintains pH in the leach circuit at between 9.5 and 11 and has set an operating goal of pH 10.5 for the leach solution.

Tüprag has identified tasks and assessed the work areas where there is potential for significant exposure to cyanide. Tüprag has installed 27 fixed HCN detectors (Polytron 5100 and 7000, Dräger) in the ADR Cyanide Storage Building, Old and New Cyanide Preparation Tank areas, Acid Washdown Area, SLS Plant, SLS Storage Building, New Cyanide Storage Building, Leach Area, CIC areas and Piping Team Office Area where there are potential for HCN gas generation and use portable HCN detectors when conducting tasks where there is a potential for HCN gas generation. In addition, HCN gas is monitored each shift at frontline locations using a portable HCN device to check for potential concerns.

The HCN portable and fixed detectors alarm at 4.7 ppm and 10 ppm. In addition, 39 portable HCN detectors (Pac 7000 and Pac 8000, Dräger) are maintained by Tüprag for use by personnel on tasks where there is a risk of exposure to HCN gas. Operating procedures also specify which tasks require the use of portable monitors. Sixteen emergency escape devices comprising filtered masks (PARAT® masks) rated to be protective up to 2,500 ppm HCN have been placed within the ADR Plant and the Gold Room for use in the event of emergencies. Tüprag routinely controls the installation and expiry dates of the masks and filters to the front of the devices for ease of visibility and implemented a control form for noting monthly inspections.

All fixed and portable gas detectors are calibrated on site. The technical service of supplier company (Dräger) calibrates each fixed monitor semi-annually and records have been maintained by the HSS Department. For portable gas detectors, each department is responsible for their detectors and calibration tracking by the HSS Department.

PPE (rubber gloves and boots, chemical overalls (Tyvek), and full-face respirators and HCN gas filters are required during cyanide mix operations. The use of portable HCN monitors is also mandatory. Dust filters and Tyvek overalls are also required when handling sealed IBC boxes during delivery or transfer from the cyanide storage warehouse. If HCN concentrations exceed 10 ppm the area is evacuated and re-entry to the area is only permitted by personnel wearing chemical suits and SCBA. Contractors and suppliers are provided with respirators and are fit tested prior to being permitted to enter areas where cyanide is present. Workers were observed to be clean shaven and equipped with respirators and portable HCN monitors in the workplace.

Cyanide warning signage appeared to be well maintained. Signage is clearly posted at entrances to the ADR, mixing area, SLS refilling-mixing areas, ponds, curing system, cyanide storage areas. Warning signage includes cyanide hazard warning signs; prohibitions on open flames, smoking, eating and drinking; restricted entrance to authorized persons only; PPE requirements, and a colour coding key for pipelines. Tanks in the cyanide mixing area and leach area including new CIC tanks are clearly labelled with cyanide warning signs. Cyanide hazard warning signs are also posted on fencing around the cyanide facilities. Pipelines are clearly colour-coded and labelled to identify the cyanide solutions and flow direction in lines and pregnant and barren solutions in the ADR. Instructions for actions to be undertaken in the event of HCN releases and alarm triggers are prominently posted at locations around the ADR Plant and new CIC tanks.

Since the 2019 recertification audit Tüprag has received solid cyanide from four suppliers (Orica, CyPlus, Hebei, and AGR). All these suppliers provide Carmoisine dye included in each cyanide box, except for CyPlus. Tüprag has procedures in place to add Carmoisine dye to when CyPlus boxed cyanide to is used at the ADR mix plant and at the SLS mixing plant.

Shower and eye-wash units are located in strategic areas of the process plant where there is a potential for exposure to cyanide. Showers and eye wash stations are checked weekly for flow, condition, mechanical and visual control, and access.

Fire extinguishers are located strategically about the mine site. Fire extinguishers in the cyanide use areas (ADR, SLS, and Storage) are all dry chemical extinguishers. The fire extinguishers are inspected weekly by the departments, monthly by the HSS Department and serviced and inspected together with the fire detection systems by an outside contractor every five months.

The solid cyanide is stored in locked buildings that are enclosed within security fenced compounds. Cyanide warning signage is posted on the security gates to the compounds and on the entrance doors to the storage areas. Plywood cyanide boxes are stored inside the warehouse with their original packing signage and labelling that include United Nations (UN) identification and Safety Data Sheets (SDS) information. SDS manuals containing hard copies of SDS are strategically located at the warehouse, SLS refilling-station, ADR, and

laboratory. The SDS are in Turkish and English and filed in binders and segregated by mine area for ease of reference.

Tüprag has not experienced any major cyanide exposure incidents since 2019. Tüprag has a procedure in place to investigate incidents. The procedure provides instruction and guidance to ensure that investigations are completed and applies to all employees and contractors. Upon an incident or near miss, the observer is required to report to their Supervisors and/or the HSS Department and complete an *Incident Investigation and Reporting Form* either in paper copy or directly into the INX electronic system. Upon capture of the incident, a notification email is delivered to the HSS Department, the relevant Department Managers and Superintendents, and the Environment Department.

Review of INX incident records indicate six cyanide related incidents/near misses since the 2019 recertification audit although none involved significant exposure or environmental impact. Investigation results and corrective actions are communicated to workers through daily meetings or other means. Corrective action tasks are subject to follow-up through the Action Tracking Process and may also lead to new or additional training requirements, or modification of current operating procedures.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 6.3.

Summarize the basis for this Finding/Deficiencies Identified:

Shower/eyewash facilities are located at strategic areas of the site, including near areas where cyanide is handled, to provide immediate access to workers in the event of contact to cyanide. Eyewash solution and oxygen kits are available in the Plant Site. Sixteen medical oxygen resuscitator kits (15 units retained in storage) are available for use. The units are inspected monthly by clinic personnel and recorded on control forms which also note the expiry date of cylinders. At the time of the audit the Fire Rescue Team (FRT) comprised 47 members and all are trained in the use of medical oxygen, application of first aid, fire emergencies, confined space entry, vehicle rescue, and chemical emergency responses.

Tüprag has 20 packs hydroxocobalamin (Cyanokit, expire dates: 2025 and 2026) available in the event of a cyanide first aid emergency. As hydroxocobalamin is applied intravenously and can therefore only be administered by Occupational Physician or paramedic, the kits are maintained at the medical clinic.

First Aid Kits are present at strategic locations within buildings and emergency response vehicles. They are inspected by clinic personnel with observations noted on a control form.

First aid kits and response equipment are also included on the checklist control form used by the HSS Department for their monthly inspections.

Communication is through radio, cell phone, or fixed phone. All workers including security personnel are equipped with radios for use in the field and plant. Most workers prefer and use cell phones in place of radio. Light vehicles are equipped with hands-free systems for cell phones.

Tüprag has developed plans for responding to cyanide leaks and spills. Emergency response procedures in the event of a cyanide release are set out in the ECMP and CMP. The CMP also refers to the ECMP. Specific emergency response procedures to cyanide, cyanide solution or HCN gas releases are detailed in the CMP. Cyanide emergency scenarios are also described in CMP including cyanide spills within and outside of the mine boundary, medical emergencies from cyanide contact or HCN gas, HCN emissions on or outside the mine, fires involving cyanide, heap leach slides, overflows from ponds containing cyanide solution, cyanide solution leaks from heap leaches and ponds, and temporary shutdowns or process and equipment failures. Potential scenarios for cyanide exposures, and emergency response methods for cyanide spillages, cyanide exposures symptoms, first aid and advanced treatments are identified and detailed in the ECMP. The ECMP details the roles and responsibilities and response actions for potential cyanide release situations.

Tüprag continues to subscribe and remain committed to the Mining Association of Canada's Towards Sustainable Mining (TSM) initiative. To address the TSM Crisis Management and Communications Planning Protocol, Tüprag continues to implement the ECMP. The ECMP objectives are to ensure pre-emergency preparations are in place, measures are in place to protect people and the environment, and to minimize commercial damage and prevent reoccurrence of any incidents. Management structure, roles, responsibilities, procedures, and responses for various emergency scenarios are detailed including spill or releases of chemicals such as cyanide.

Tüprag has the capacity to respond to most medical emergencies at the site. The site continues to operate a clinic which is staffed with an Occupational Physician and five paramedics who provide 24-hour medical support. The paramedics receive cyanide awareness training and instruction on the application of medical oxygen and intravenous use of Cyanokits from the Occupational Physician. All workers received cyanide awareness training including recognition of the symptoms of cyanide exposure and poisoning and first response actions to follow; however, apart from the FRT and medical personnel, are not expected to apply medical first aid. Security is responsible to ensure the clinic is notified and to initiate the emergency call-out procedures. In the event of an emergency, workers are required to first ensure his/her own safety and to notify others in the vicinity of the situation, thereafter, to report the emergency to security or the area supervisor who will take the role of a Local Emergency Officer. At the time of the audit there were 47 FRT members and 308 trained first aiders and 50 trained first aiders from subcontractors.

The mine has an all-wheel drive ambulance and trained drivers to follow-up through the Action Tracking Process located at the clinic in readiness for an emergency response. The ambulance response time to the ADR plant in the event of an emergency is less than 5 minutes. Tüprag has the in-house capability at the clinic to treat cyanide exposure cases, and transport to a hospital. Technical communications were made to the nearest hospitals by the Company Occupational Physician, to gather information on the Kışladağ mining operation, the use of cyanide in the gold recovery process, the potential risks associated with the operation, the emergency response plan and in house response capability, and the potential additional medical services that may be requested in the event of an accident.

7. EMERGENCY RESPONSE **Protect communities and the environment through the development of emergency response strategies and capabilities.**

Standards of Practice

7.1 Prepare detailed emergency response plans for potential cyanide releases.

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 7.1.

Summarize the basis for this Finding/Deficiencies Identified:

The ECMP and CMP identify the emergency management organization, emergency reporting structure, emergency response protocols, roles and responsibilities, evacuation procedures and emergency communication details, contact information of external support, FRT Team equipment and drills scenario, cyanide exposures and symptoms, first aid rules, use of cyanide emergency medical kit and further treatment, and methods for emergency response methods to cyanide spills.

Potential emergencies other than cyanide related emergencies are separately addressed in the ECMP. The specific procedures that describe the standard actions to follow in the event of an unplanned release of cyanide or cyanide related emergency are presented in the ECMP. Cyanide related emergencies are also addressed in the CMP. The CMP and ECMP are regularly updated and representative of the current operational situation at the site.

Tüprag has identified and periodically evaluated possible emergency response protocols for a range of different scenarios in the ECMP including detailed scenarios of potential cyanide emergencies. The CMP identifies and addresses a range of cyanide failure scenarios appropriate to Tüprag's operations. Protocols for each scenario identify the specific actions and the steps and roles and responsibilities of various personnel during an emergency. The protocols address all probable emergencies including releases from low potential catastrophic events.

In the past three years, Tüprag has only purchased cyanide from suppliers and transporters who are responsible for cyanide transport to the port of embarkation including route planning and emergency response. Cyanide transport outside of the mine area is the responsibility of the emergency response unit (Hidra) providing escort to the road vehicles.

An Emergency Response Plan which is applied by the emergency response company (Hidra), specific to responding to potential transportation emergencies between İzmir Port and Kışladağ Gold Mine Site. This company and has overall responsibility to ensure that all parties (including subcontractor personnel) are familiar with the plan. Hidra has an emergency response vehicle that accompanies each transport convoy to respond to the emergencies.

The CMP provides instruction on responding to cyanide incidents on the mine including transport related incidents and actions to be taken. However, any requests for assistance from Kışladağ for incidents will be evaluated by the Tüprag Crisis Management and assistance provided upon General Manager's approval. The ECMP provides response protocols for emergencies resulting from chemical/hazardous waste releases (including cyanide) within the mine site including during transport.

The ECMP sets out response actions for the following defined emergency scenarios:

- Level 1 Emergencies which are defined as incidents that are small and limited incidents that can be controlled through intervention of the Local Emergency Officer (LEO).
- Level 2 Emergencies are responded to and dealt with using the resources in the mine site by implementing protocols in the ECMP. The Emergency Control Group (ECG) leads the response and management of emergency.
- Level 3 Emergencies are defined as crisis level situations that cannot be responded to or controlled under the operation's resources, which involve serious hazards, cover a wide area or pose a serious threat to life, the enterprise and surrounding community, and require the use of external resources. The Kışladağ Crisis Management Group (KCMG) is activated with the support of the Tüprag Crisis Management organizational structure.

Upon discovering an emergency, workers are required to notify the area supervisor or manager who takes on the role of LEO. The LEO will check if security has also been notified, initiates first actions and assesses the situation and if determining that the emergency is a Level 2 or Level 3 will contact the Emergency Coordinator (EC) who will coordinate efforts of the ECG. The EC, and members of the ECG are listed within the ECMP including their contact information.

The ECMP includes protocols that present specific response actions to be followed for various types of cyanide emergency and defines actions to be followed in case of cyanide releases which may affect communities. The CMP describes emergency scenarios including cyanide

spills within and outside the mine boundary, medical emergencies from cyanide contact or HCN gas, HCN emissions on or outside the mine, fires involving cyanide, heap leach slides, overflows from ponds containing cyanide solution, cyanide solution leaks from heap leaches and ponds, and temporary shutdowns or upset conditions.

The FRT will be triggered by security and/or the EC in the event of a Level 2 or Level 3 emergency. Emergency shower and eyewash stations, first aid stations, assembly points, fire and rescue stations are shown on site layout maps which are posted at locations around the site.

The ADR Plant process areas have secondary containment or hardstanding areas that drain to process ponds to prevent contamination of soil and groundwater. Secondary containment is of sufficient capacity to contain the largest tanks and designed to consider storm events. Spill kits, absorbent pads, portable containment ponds, and drums for receiving waste materials are sited at strategic locations and readily available in the HAZMAT vehicle.

7.2 Involve site personnel and stakeholders in the planning process.

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 7.2.

Summarize the basis for this Finding/Deficiencies Identified:

Tüprag continues to maintain several opportunities where the workforce can provide input into emergency response planning, including monthly worker Health and Safety (H&S) committee meetings, quarterly H&S meetings, toolbox talks, employee engagement program meetings, desktop simulations, departmental risk assessment updates, and preparation of JSAs.
Tüprag has a policy to actively involve local communities, and public and private stakeholders to address questions and concerns on the use of cyanide in mining and management of transportation accidents or other emergencies involving cyanide. The External Affairs Department holds meetings, approximately weekly, with community elders at nearby villages and towns to discuss concerns around mine operations and obtain feedback. Tüprag hosts Community of Interest Group meetings every six months and shares information of mining operations, including of cyanide management, with external stakeholders such as Village Headmen, union representatives, supplier representatives, shuttle bus representatives and solicit feedback related to mining operations at such meetings. The ECMP contains requirements to develop communication plans and notify external stakeholders in the event of an emergency. Annual meetings are also held with the provincial Governor, Police Chief, University Director, Army and Gendarme commanders and with surrounding local hospitals.

Mutual medical personnel are trained and qualified to treat cyanide exposure victims on site. There are large well-equipped hospitals in the region that are capable to responding to cyanide related medical emergencies. If there is a need to involve the local hospital, mutual has on-going communication with the hospital there. 24-hour ambulance service (4-wheel drive) is available on the site, and additional ambulance and medical personnel can be requested from Ulubey, Eşme and Uşak emergency medical services.

Tüprag periodically reviews the CMP and ECMP and conducts emergency drills with input obtained from site personnel, workers, and internal stakeholders. There are other external stakeholders (with Fire Brigade and Disaster and Emergency Management Authority (AFAD, Government Agency)) with direct involvement with the CMP and ECMP. Off-site emergencies associated with transportation are the responsibility of subcontractors. The External Affairs Department consultations with communities, government agencies, hospitals, emergency services and other external stakeholders allows the opportunity for them to provide indirect input into the ECMP, CMP and site procedures.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 7.3.

Summarize the basis for this Finding/Deficiencies Identified:

The roles and responsibilities of emergency response personnel are detailed in the ECMP and the CMP and remain essentially unchanged as observed in the 2019 ICMC recertification audit. Emergency response coordinators are designated depending on the level of severity of emergency defined in the ECMP. The local incidents and emergency teams are designated in the plan with roles and responsibilities for initial response in a cyanide related emergency. Alternates are also defined in the plan. For Level 1, 2 and 3 incidents, responsibilities and roles are also designated to the Health Coordinator, Environment Coordinator, Security Coordinator, FRT and FRT Lead. Specific persons and their alternates are named for each of the roles. The FRT members, leads and their alternatives are listed in the ECMP. FRT members are trained according to an annual training plan. Training sessions are conducted every month with the attendance of FRT members to accommodate members in four groups to ensure training of members from different areas and shifts.

Tüprag has a 24-hour security service, and security manage the call out procedures for relevant coordinators and FRT members. An up-to-date list of emergency contacts and telephone numbers is maintained by security at the main security office. The roles and responsibilities of coordinators and emergency response personnel are defined in the ECMP for each of the emergency levels designated by Tüprag. CMP and the ECMP lists the extensive emergency response equipment and personal gear on site to respond to cyanide

related emergencies. Emergency response equipment is inspected monthly by the HSS Department. The ECMP provides contact information for outside responders, medical facilities and communities to be notified in emergencies.

Meetings held with stakeholders such as hospitals, fire departments, government and civil service representatives, Gendarme and Army representatives and communities through weekly community meetings; provide awareness to outside entities about potential emergency situations where outside emergency response assistance may be requested. Changing regulation sets out requirements by companies to conduct mutual emergency response exercises with outside entities. However, due to Covid-19 restrictions, the number of drills conducted with outside entities has been limited.

In accordance with Turkish regulations, Tüprag are currently undertaking a site assessment aligned with the European Union (EU) Seveso Directive for control of major accident hazards. An outcome of this assessment was the development of an Emergency Action Plan which was shared with the Disaster and Emergency Management Authority (AFAD) and may include requirements for joint responses in the event of a major accident potentially including cyanide release.

7.4 Develop procedures for internal and external emergency notification and reporting.

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 7.4.

Summarize the basis for this Finding/Deficiencies Identified:

The CMP and the ECMP include contact information for Tüprag and its corporate management personnel, regulatory agencies, external responders (i.e., fire and ambulance), community representatives (provincial and district Governors and Mayors), town civil defence organizations, police and town gendarmes, and hospitals, as well as call out procedures and other emergency response protocols. The ECMP places responsibility on the External Affairs Manager (as the Communication Coordinator/Spokesperson) to coordinate and communicate with the local and provincial government including the Uşak Governor who in turn would contact the relevant regulators including the Environment and Urban Directorate, General Directorate of Mining and Petroleum (MAPEG) Affairs, and General Directorate of Labour and Social Security.

The CMP defines which communities the KCMG will notify in case of the event of a cyanide emergency. Depending on the nature of the emergency, affected communities and their representatives may be contacted directly. Community and media relations guidelines in the

ECMP provide detailed information on media statement preparation, next of kin notification, and spokesperson/news briefing procedures. The ECMP also provides procedures for notifying leaders and representatives of villages and communities by Tüprag's External Affairs department.

Tüprag has procedures for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. No such significant cyanide incidents have occurred or been reported to ICMI since recertification audit in 2019. Initial notification is requested within 24 hours of its occurrence and should include the date and nature of the incident, and the name and contact information of a company representative to contact for additional information. Further salient information, such as root cause, health, safety and environmental impacts, and any mitigation or remediation is requested to be provided within seven days of the incident. ICMI will use the information to refer inquiries that it may receive to the designated company representative, to ensure that an incident at a certified operation is evaluated when the operation is audited for recertification, and to evaluate the effectiveness of the Code's requirements in preventing similar incidents.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- † not in compliance…with Standard of Practice 7.5.

Summarize the basis for this Finding/Deficiencies Identified:

CMP, ECMP and its protocols address recovery and neutralization of cyanide solution and solid cyanide spills. Calcium hypochlorite is a neutralizing agents selected for use and form part of the spill response kit. Calcium hypochlorite may also be used but is recommended only for residual trace cyanide concentrations and for washing equipment and personal protective equipment. These agents are stored in drums in the strategic points as the ADR, Cyanide and SLS storage areas. The HAZMAT vehicle is also equipped with spill kits, disposal containers, appropriate PPE, and other equipment necessary to manage and control a cyanide spill. As specified in the plan and procedure, dry cyanide material spills onto soils are collected along with any contaminated soils and placed in sealed containers or bags. Residual contamination is neutralized with calcium hypochlorite. Procedure of decontamination with calcium hypochlorite requires that a 5% solution of calcium hypochlorite is prepared for spray application onto the affected area. Contaminated soils are disposed to the heap leach pad as the first appropriate location for disposal under instruction of the Environment Department. For the cyanide spill response, the Environmental Department would collect soil samples from the contaminated area and forward them to an accredited laboratory (third party) for Total CN, WAD CN, Free CN and pH analysis. Clean-up standards set by regulations published by Ministry of Environment and Urbanism, require

WAD CN concentration be "<10 ppm". Because of the hydrogeology and distance, there is a low risk of cyanide impacting drinking water supply lines for surrounding villages. In the unlikely event that an alternate drinking water supply is needed for local communities the CMP indicates that drinking will be supplied for the use of the related parties.

Calcium hypochlorite is referred to in the CMP to neutralize spills. CMP clearly state that use of calcium hypochlorite for cyanide neutralization is strictly prohibited where has been released into natural surface water bodies due to toxic nature of those chemicals to aquatic life. Tüprag continues to maintain a hydrogen peroxide dosing system at ponds but this will only be applied in SWP-1 and used to neutralize cyanide contaminated water in the event of a requirement to discharge because of an extreme storm event to prevent overtopping of ponds. Additionally, hydrogen peroxide is noted as being harmful to aquatic life.

The ECMP and CMP define spill clean-up procedures in detail and refer to sampling after the residue has been cleaned up to confirm that remediation has been completed. These plans also define a monitoring program for water quality to be applied in cases where cyanide solution enters surface water. The program defines the sampling locations, sampling frequency, sampling quantity and reference values (total cyanide concentration of 0.1 mg/l according to Turkish regulations). For situations such as overflow from ponds or leaks from ponds and the heap leach pad, the CMP requires monitoring of receiving water environment. Tüprag has arrangements with university laboratories in Türkiye, if required. Tüprag has a contract with ALS (Canada), Dokuz Eylul University Environment Department Laboratory (Türkiye), Çevre Analiz Laboratory (Türkiye) as Accredited Environmental Laboratories, governmental and private laboratories from Türkiye accredited by TURKAK and Ministry of Environment and Urbanization.

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 7.6.

Summarize the basis for this Finding/Deficiencies Identified:

The ECMP and CMP are reviewed on an annual basis to ensure they are up to date and reflect changes in operations, legislation and procedural improvements. Tüprag continues to maintain ISO 45001 and ISO 14001 accreditation which require management procedures and plans to be reviewed and maintained up to date to account for changes in operation, procedures, and legislation. Additionally, there is a new corporate SIMS (a part of the sustainable mining principle) requirement that Kışladağ is implementing, in which Eldorado Gold strives to provide a healthy and safe working environment for all its employees, protect the environment, and establish respectful stakeholder relationships, and commitment to excellence in responsible mining and sustainability.

The ECMP and CMP require that drills are conducted to test the understanding and readiness of the ECG, KCMG, and Rescue Team. Tüprag has continued to conduct mock drills since the 2019 audit. Emergency drills are conducted throughout the year that consider both environmental releases and worker exposures. These drills include both practical and desk-based exercises. Since 2019, five cyanide drills have been undertaken by the FRT. One of these drills, conducted in August 2022, was undertaken with participation of the Gendarme, Provincial Directorate of Health, AFAD and Hidra. In addition, evacuation drills are conducted monthly. The FRT also conduct monthly training exercises where various emergency scenarios are tested. Each drill has been evaluated to critique the effectiveness of the ECMP and CMP and any follow-up corrective actions, as needed to fix deficiencies identified during the drill and improve the response of the FRT, are tracked to completion. Responsible persons are allocated to implement the corrective actions. The evaluations conducted on the mock drills undertaken in the past three years did not identify any deficiencies that would require revisions to improve the ECMP and CMP.

For any incident, including, a cyanide related incident, an investigation is required to identify the root causes and corrective actions to be implemented to prevent a reoccurrence. INX incident records indicate the six cyanide related incidents/near misses since the 2019 recertification audit. Tüprag maintains a formal incident reporting and investigation program which categorizes incidents as lost time, restricted work injuries, injuries of different grade of severity, medically treated injuries, first aid injuries, property damage, spills, and near-misses. None of the incidents that occurred over the past three years warranted revision of the ECMP or CMP, but modifications were made to a number of the JSA instructions to reduce the potential of such an incident in the future.

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

Standards of Practice

8.1 Train workers to understand the hazards associated with cyanide use.

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 8.1.

Summarize the basis for this Finding/Deficiencies Identified:

Cyanide training is mandatory for all new employees and contractors who will work in cyanide facilities. This training includes forms of cyanide, recognition, hazards, signage, safe handling guidelines, exposure routes, control of the generation of HCN gas, symptoms of cyanide poisoning, and first aid treatment in the event of exposure. Employees understanding are tested with pre- and post-training tests with a 70% pass mark required.

Visitors to the operation receive a basic induction which includes cyanide awareness and information on cyanide hazards. For visitors, an induction video is watched in Turkish with English subtitles, and a short exam is applied. This program also includes instruction on cyanide awareness and cyanide management including the CMP, ECMP, Cyanide Code, cyanide properties, exposure symptoms, hazards, usage, and safety systems.

Prior to undertaking cyanide related tasks, all workers receive further training on management systems and JSA Work procedures including those specific to cyanide tasks. Each new worker receives pre-work training for a minimum of two hours specific to the department or area of work. New employees to the ADR plant receive on the job training from experienced operators under supervision of the day shift supervisor for at least one week. Thereafter the employee receives a further four weeks of training to the satisfaction of their supervisor and general foreman, requiring a competency score of 70% before being allowed to work under less supervision.

Cyanide refresher training is undertaken as part of a 16-hour health and safety refresher training program (Long - Period H&S training) that is periodically required by all workers incl. subcontractors. Of this 1 hour is cyanide awareness training with an examination. This refresher training includes cyanide awareness, risks of cyanide, cyanide handling procedures and emergency response. Employees specifically working or engaged on cyanide related tasks are required to complete additional refresher training on specific cyanide related operating procedures. These include emergency procedures, cyanide offloading and mixing procedure, cyanide storage, oxygen resuscitation kit operation, CyanoKit and CarboSorb awareness, expiry dates for HCN gas canisters, cyanide facility inspections, working on cyanide pumps/valves/pipelines/tanks, and wet and dry sodium cyanide decontamination.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 8.2.

Summarize the basis for this Finding/Deficiencies Identified:

Tüprag continues to maintain a detailed training program for cyanide related tasks and related health and safety procedures. All workers that undertake cyanide related tasks are required to complete cyanide awareness training as well as task specific training. As per a legal requirement, plant operators must also receive "Occupational Certification" before being permitted to work. Certification is gained through a 5-days program provided by government trainers. The program provides a general understanding of process operations. Prior to undertaking tasks without direct supervision, workers must undertake training in standard operating procedures.

There are general operating procedures for non-cyanide specific mine site operating tasks that all workers are required to be trained. In addition, workers that have job tasks involving cyanide are required to complete training in specific procedures for each of the applicable cyanide related tasks conducted as part of their job role. This task training includes training in cyanide unloading, storage, SLS repacking, and cyanide mixing operations; cleaning screens, preparation of stripping solutions, and operations with other hazardous materials including safe working instructions with caustic, HCl, SO_2 and activated carbon and management of the cyanide application at the grasshoppers. The training requirements program identifies the safety and monitoring equipment in-place, warning signage, PPE requirements, and procedures to be followed to minimize risks associated with task related hazards.

Tüprag has JSA work instructions for mine operations. A training matrix is used to track cyanide related requirements and there are 33 JSA routine and nonroutine procedures specific to the ADR plant. These include those specific to transport, unloading/loading, storage, curing, refilling, mixing, preparation of stripping solutions, cleaning of pits/tanks/screens, sample collection, disassembly of cyanide boxes, activation of the hydrogen peroxide dosing system and other production and maintenance tasks. All JSAs contain instructions to be followed for each task, the hazards identified, PPE to be used, and precautions to be followed for safe working.

Operating procedures form the basis of the written materials for training. These procedures provide the information on the primary hazards of the task, required PPE, step by step instruction on performing the task, and reference to related safety and operating procedures. Training requirements associated with the operational procedures applicable to each area/process in the plant must be completed to the satisfaction of the training supervisor before a worker can work unsupervised in that area or process. All staff receives cyanide awareness and Long - Period H&S training (H&S Training, Physical and Chemical Risk Factors, PPE Training, Health Training, Fire Training) which is updated annually.

Employee task training is undertaken by supervisors and senior operators/employees managers who are experienced in cyanide process operations. This training is supplemented by monitors assigned in each area who have been trained to provide cyanide training. In general, the supervisor of an area is assigned the role of monitor. Monitors have received detailed training on the management of cyanide in the workplace. During a 2-month probationary period, employees are monitored and work with an experienced employee. After passing the 2-month probationary period, the worker is allowed to undertake assigned tasks without being monitored by an experienced employee and shift supervisor.

All personnel are required to attend induction training which includes cyanide awareness and hazard training. Each new worker receives pre-work training specific to the department or area of work. New employees are also required to work under supervision for a minimum of two weeks to their supervisor's satisfaction before being allowed to work unaccompanied and

provide a sign off confirming understanding of the JSA. Induction, Long - Period H&S training (H&S Training, Physical and Chemical Risk Factors, PPE Training, Health Training, Fire Training) is provided by HSS Department trainers under the guidance of the H&S Specialist.

For task training, a 1-day long process plant orientation training is completed by all new employees. Then over a 2-month period, new employees observe the tasks done by experienced operators in day shifts. This is followed by up to a 4-month probationary period during which the employee is observed by the shift supervisor and process engineers. Each department is required to conduct 16 task observations per annum to evaluate operator safety: including performance of operator activities, operator behaviour, and management of task related risks.

Records for cyanide training are retained throughout an individual's employment. Records are in the form of signoff sheets that include the training topic(s), trainers name and signature, date of training, and sign-off by each attendee. The course materials are either videos and power point presentations, as in the case of induction training and cyanide awareness refresher training, or the actual standard operating procedures in the case of task training.

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 8.3.

Summarize the basis for this Finding/Deficiencies Identified:

Operators are provided with radios and are trained to contact security via an emergency call channel and their supervisors in the event of an emergency. Operating procedures include pre-work checks on the location and access to emergency response equipment and for testing showers prior to mixing cyanide. Operators are also provided with and trained in the use of personal HCN monitors, which in addition to the fixed HCN monitors strategically located in the ADR plant, carbon columns, SLS Filling Station and cyanide storage mix areas, alert operators of HCN gas releases and when to evacuate a work area.

All employees that work with cyanide complete cyanide hazard training and refresher training. This training includes recognition of cyanide exposure symptoms, decontamination and first aid. The CMP contains procedures for decontamination and rescue operations which are carried out by the FRT. Depending on the shift at least two or three members of the FRT are always present at the ADR Plant during each shift. The pipe irrigation team on the heap leach pad has at least one FRT member present per shift. The FRT members have been trained to apply first aid including the use of medical oxygen and advanced medical first aid.

Medically trained personnel from the mine's clinic provide further assistance such as administering Hydroxocobalamin (Cyanokit). Depending on the shift at least two or three operators are also members of the FRT are always present at the ADR Plant during each shift to provide immediate first aid assistance as needed. The FRT members like all employees, also receive annual cyanide first aid training from the clinic doctor. The FRT conduct monthly emergency response training exercises. Since 2019, these exercises have included a cyanide solution spill and HCN release in the ADR; a vehicle rollover and solid cyanide spill with release of HCN, a man-down cyanide exposure scenario, and pond overflow. These exercises include the FRT, security and medical personnel from the clinic.

The Emergency Response Coordinator has training meetings with the FRT members whereby a range of topics are covered including emergency call out procedures, cyanide awareness, cyanide hazards and management, first aid procedures, and cyanide exposures. Topics discussed in the training sessions include evacuation drills, hazardous materials handling, fire extinguisher use, basic firefighting, cyanide management, basic first aid and mock drill rehearsal. Additionally, FRT members receive specific training in HAZMAT including cyanide releases, cyanide exposures, first aid firefighting, eye wash/shower scenarios and entry into enclosed spaces.

Kışladağ Gold Mine has the resources to handle all probable emergency situations through an onsite team of well-trained emergency brigade personnel, emergency response vehicles and equipment, and medical capability available from Mutual on-site paramedics, nurse, and doctor. This includes onsite capability in HAZMAT, firefighting, and medical response to the extent that outside responder would only be required for a Level 3 emergency crises. The mine meets annually with local community stakeholders and has also communicated with local government agencies, including the Ministry of Health Department in Uşak to provide information on the Kışladağ mining operation, and to discuss the potential additional services and support that may be requested in the event of an accident. There is one well-equipped ambulance onsite that includes medical oxygen, and the nurse/paramedic/doctor emergency kits also contain cyanide antidotes.

Cyanide awareness is included as a specific topic and covers hazard signage, safe working with cyanide, the CMP and ICMC requirements. During the last 3 years (2019-2022), cyanide hazard recognition refresher training was undertaken by all workers including members of the FRT as part of annual general cyanide refreshment training. The training is provided by the Process and Health Departments. Additionally, FRT members receive specific training in HAZMAT including cyanide releases, cyanide exposures, first aid firefighting, eye wash/shower scenarios and entry into enclosed spaces. The clinic nurse and paramedics receive annual cyanide awareness training and instruction from the medical Doctor on the application of medical oxygen and intravenous use of Cyanokits.

Review of a selection of emergency response training records for the FRT members confirmed that they included the names of the employee and the trainer, the date of training, the topic covered and results of testing on the training materials,

***9. DIALOGUE* AND DISCLOSURE Engage in public consultation and disclosure**.

Standards of Practice

9.1 Promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns.

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 9.1.

Summarize the basis for this Finding/Deficiencies Identified:

Tüprag continues to maintain a transparent community outreach program similar to that noted in the 2019 ICMC recertification audit. Tüprag has implemented the plans and procedure to engage with local government, non-government organizations (NGOs), media and the press. The SIMS is a part of the sustainable mining principle, in which Eldorado Gold strives to provide a healthy and safe working environment for all its employees, protect the environment, and establish respectful stakeholder relationships, and commitment to excellence in responsible mining and sustainability. The Indigenous and Community Relationships Protocol under the TSM is a tool Tüprag uses for Assessing Indigenous and Community Relationships Performance against TSM indicators. The assessment protocol sets out the general expectations for Indigenous and community relationships as part of the TSM initiative and supports implementation of the TSM Mining and Indigenous Peoples Framework. As with any assessment of a management system, professional judgment is required in assessing the degree of implementation of a system indicator and the quality of management processes and intervention.

Kışladağ Gold Mine manages water and biodiversity activity in conformance with Level A of the TSM Water Stewardship Protocol and Biodiversity Conservation Management Protocol. Kışladağ Gold Mine demonstrated that commitments and accountabilities related to water stewardship are in place and are consistent with the TSM Water Stewardship Framework. Conserving biodiversity through all stages of a mine's life cycle is a Tüprag's priority and helps to maintain Kışladağ Gold Mine's privilege to operate.

Tüprag's general policy remains to be as responsive and communicative with the public as possible in relation to mining operations and the use of cyanide, and engage with stakeholders in several ways:

- The External Affairs Department is responsible for engaging with governmental offices and local people, affected by mine's activities. The Department meets with interested local stakeholders at least twice a year (e.g., bi-annual community consultancy

meetings), although several meetings were cancelled in 2019, 2020 and 2021 due to Covid-19. In addition to planned meetings, many unplanned meetings (village visits and visits of the villagers to the mines) were held.

- Tüprag's general policy of "Open door policy and open visitor access" is to be as responsive and open as possible with respect to questions or requests for information on the management of cyanide. Information provided to mine visitors includes basic cyanide awareness information in a booklet which includes cyanide management and actions to be taken in the event of an emergency.
- Tüprag, on an annual basis, organizes and conducts dozens of site tours for external stakeholders including NGOs and members of the public. Since 2019, a total of 1158 people have visited the site. All visitors receive basic information on the use of cyanide in the mining process as well as basic practices employed for the safe management of cyanide in transportation and use. Tüprag also organizes semi-annual community meetings in open-forum formats that permit participants to ask questions or voice concerns regarding the management of cyanide.
- Complaints or other communication received from outside parties are fully documented. Any such complaints, requests or proposals received from communities of interest or local people are examined by the External Affairs Department, and where necessary, discussions are held with other concerned departments. Responses are communicated back to the relevant party in person or by telephone/on-line. Forms can be completed anonymously if preferred and placed into complaint boxes which are opened every Friday under supervision of Tüprag security. All grievances are recorded on a complaints registration form which is then submitted to the External Affairs Manager for action.
- Public Inquiry Forms are completed should external stakeholders contact the mine by telephone with a concern or issue. These are provided to the General Manager. Follow up actions are taken as necessary and verbal or written feedback is provided to the complainant. Of the 28 complaints filed in that past three years, none relate to cyanide.
- Tüprag hosts Community of Interest Group meetings every six months, normally in May and November, and shares information about mining operations, including of cyanide management with external stakeholders such as village headmen, union representatives and supplier representatives.
- Periodically annual meetings are held with the provincial Governor, Police Chief, University Director, Army and Gendarme commanders and representatives of surrounding local hospitals, where possible at the mine site. Regular dialogue is also maintained throughout the year with hospitals by the mine Doctor and the External Affairs Department through phone calls or in person visits.
- The Eldorado web page (https://www.eldoradogold.com) contains information about the Tüprag's mining operations and provides contact forms where issues of concern can be raised for action by Tüprag's management or the External Affairs Team.

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 9.2.

Summarize the basis for this Finding/Deficiencies Identified:

Tüprag has developed presentation materials (flyers, leaflets, brochures) for communities and stakeholders including brochures that describe the effects of cyanide on health and the environment and its management at the mine site. The presentation materials, both audiovisual and written, are freely distributed at public meetings and upon request. Tüprag has continued to maintain a strong community outreach program and engages with community stakeholders on a weekly basis; and community leaders, majors, public officials, police and gendarmes, Disaster and Emergency Management Authority (AFAD), local fire and hospital representatives on annual basis during which information about cyanide management and mine operations is provided.

All visitors to Tüprag undergo a video induction including health and safety topics and receive a brochure "*Kışladağ Gold Mine, General H&S and Environmental Rules Brochure for Visitors*" that provides basic health and safety information including cyanide awareness and information on cyanide management. Video presentations (Turkish with English underlined) are also given that provide a basic overview of the use of cyanide in gold mining and the precautions taken in the production, transportation, storage, and use of cyanide.

Tüprag employment policies have resulted in approximately 82% of the mine workforce being drawn from local communities many of whom have relatives or friends within those communities. Tüprag views this as an important source of community input whereby any concerns or issues from external stakeholders can be relayed by workers to the External Affairs Department.

Tüprag maintains a corporate website that contains a technical information on the Kışladağ Gold Mine as well as a Sustainability Report issued annually that contains general information on cyanide management, company commitments to ICMC compliance, environmental, health and safety and also social performance. Reviews of incident records from 2019 through to 2022 indicate that there have been no major cyanide exposure incidents, hospitalizations, or fatalities since last audit in 2019.

Literacy around the local population remains high and is not considered a significant issue. The site has developed a descriptive video of site operations; however, and all visitors to the site are provided verbal briefings in a visual presentation format. Public meetings are supported by verbal presentations as well as audio-visual materials (PowerPoint presentations and televised tool).

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Name of Mine	Signature of Lead Auditor	Date

Tüprag has procedures in place to notify the public of all "major" cyanide incidents. A "major" incident is any incident that is not classified a "minor". A minor incident being an incident or near miss in which there is no adverse effect on health or the environment and is not reportable to the regulators. Since August 2019, there have been no reportable "major" cyanide releases on or off the mine that have resulted in adverse effects to health or the environment.

In the event of an incident resulting in hospitalization, fatality, or significant on-site or off-site environmental impact, the procedures set out in the ECMP would be triggered whereby the Communication Coordinator/Spokesperson will arrange to contact public institutions, organizations and stakeholders and prepare press releases and public statements. The Communication Coordinator/Spokesperson would also be responsible for coordinating communication with employees and their families and for any post incident arrangements for treatments of anyone potentially affected by the incident. The responsibilities of the Communication Coordinator/Spokesperson require that an up-to-date list of local and regional public institutions, organizations and stakeholders is available and that draft press releases for various likely scenarios have been prepared in readiness should a crisis occur.

In addition to the above, Eldorado Gold continues to prepare an annual Sustainability Report in accordance with the Global Reporting Initiative (GRI) guidelines. As part of these requirements the Sustainability Report (2021) includes information on cyanide exposures and release information and this report is available on the corporate website for public download.