Kisladağ Gold Mine - International Cyanide Management Code Recertification Audit

Summary Audit Report

Tüprag Metal Madencilik Sanayi ve Ticaret A.Ş

Prepared by:

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Basis of Report

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1.0 Summary Audit Report for Gold Mining Operations

Name of Cyanide User Facility:	Kişladağ Gold Process Plants
Name of Cyanide User Facility Owner:	Eldorado Gold Corporation
Name of Cyanide User Facility Operator:	Tüprag Metal Madencilik San. ve Tic. A.Ş
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2.0 Location and description of operation

Location detail and description of operation:

The Kışladağ Gold Mine is the largest operating gold mine in Turkey. 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 m3 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) (27.7 km) and 34.5 kV (25 km).

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 pads (South Heap Leach Pad and North Heap Leach Pad) via an overland conveyor system, mobile conveyors (grasshoppers), and a radial stacker for placing onto the leach pad.

Kışladağ entered into a contract for the supply of solid cyanide briquettes with Hebei Chengxin Co., Ltd (latest recertification by ICMI on 18th, April 2023) at the start of 2023 until the end of 2026. Individual loads have previously been obtained from the other producers. The solid cyanide is off-loaded at the Port of Izmir and transported to site by To-Pet Petrol Ürünleri Dağ. ve Paz. San. Tic. A.Ş. a transportation company (latest recertification by ICMI on 6th March 2023). The solid cyanide briquettes are then stored at either of the ADR plants (three for the South ADR plant and one for the North ADR plant) for conversion into liquid cyanide.

There are three mixing facilities, two for the South ADR plant and one for the North ADR plant where the briquettes are loaded directly into a mixing tank (one for each facility), the briquettes are then dissolved creating liquid cyanide that is subsequently transferred to a storage tank (one for each facility) before being used to irrigate the Heap Leach pad Facilities (HLFs.)

In addition, the mine has an SLS Container Filling Station where the boxes of solid cyanide are stored. An Isotainer is then filled with cyanide briquettes. Once full the tanker is transported to one of the two SLS Mixing Stations, one for the South HLF and one for the North HLF. The Isotainer is filled with water, and the briquettes are allowed to dissolve before the liquid cyanide is then pumped into a storage tank.

There are two heap leach facilities (HLF) South Heap Leach Facility is the original HLF. This is comprised of 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. The HLF 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 construction of the North Heap Leach Facility started in 2021 with Phases 1-11 having been completed and the construction of Phases 12-14 are on-going. The total design capacity is planned to accommodate approximately 175 million tonnes of ore. The liner system, from top to bottom, is composed of:

- 2.0 mm (80-mil) double-side textured HDPE geomembrane;
- 0.5 m thick clay material with a maximum permeability of 10-9 m/s; and
- Prepared subgrade or engineered fill.

On steeper slopes where it is technically difficult to reduce the slopes due to topographical conditions, natural clay material (50 cm) will be applied together with HDPE geomembrane.

Leak Detection System is an EIA commitment for both the South and North HLF operations. A network of strip drains were installed in between liner and clay layer and directed to a solution collection channel.

The Heap Leach Facility (HLF) design utilises a conventional pad configuration with external Pregnant Solution Ponds (PSP) pond, Intermediate Solution Pond (ISP) pond and overflow pond (stormwater pond) together with Barren Solution Storage Ponds (BSP).

South and North Process Ponds will have the capacity to contain flows reporting to pond such that there is at least 95% probability of non-exceedance, as calculated using a probabilistic water balance or PMP 24 hour storm event applied on overall leach pad layout.

The North Heap Leach is being constructed to allow the cyanide concentration of the irrigation solution to be adjusted on a cell by cell basis. In addition, the mine has been investigating the vertical irrigation of stack in areas of low permeability.

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. There is a separate ADR Plant associated with the South and North ADR Plants. In 2020 the Solid-to-Liquid System (SLS) cyanide mixing facility was relocated from the South ADR Plant to the South HLF and the leach process modified to also apply reagent grade cyanide solution (curing) at the first three grasshoppers. The solution is managed using pregnant, intermediate, and barren solution ponds and the ADR plant. The water management system includes several event ponds added as the southern leach pad expanded and designed to manage precipitation in excess of a 10,000-year, 24-hour storm event. The latest event pond to be added is PRP5 that has a capacity of 448,986 m^3. This is to ensure that the site can store the water associated with an extreme storm event and prevent any discharge to the environment.

SUMMARY AUDIT REPORT

Auditors Findings

Tüprag Kışladağ Gold Plant is:	☒ **in full compliance with**	**The International Cyanide Management Code**
	☐ in substantial compliance with	
	☐ not in compliance with	

Audit Company:	SLR Consulting (Africa) Ltd
Audit Team Leader:	Ed Perry, Lead Auditor
Email:	eperry@slrconsulting.com
Mine Technical Auditor	Dr. Ata Akcil, PhD, (ICMI pre-certified Mine Technical Specialist).

Kışladağ Gold Mine
Name of Facility

Signature of Mine Technical Auditor

23 January 2026
Date

COMPLIANCE STATEMENT

Kışladağ Gold Mine, Turkey has not experienced any cyanide incidents or compliance issues during the previous three year audit cycle.

NAME OF OTHER AUDITORS

Dr. Ata Ackil PhD.

DATES OF AUDIT

The Recertification Audit was undertaken from between 21 July 2025 to 26 July 2025.

I attest that I meet the criteria for knowledge, experience, and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute (ICMI) and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Code Verification Auditors.

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

Kışladağ Gold Mine
Name of Facility

Signature of Lead Auditor

January 2026
Date

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

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

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

Principle 1 – Production and Purchase

Encourage Responsible Cyanide Manufacturing by Purchasing from Manufacturers that Operate in a Safe and Environmentally Protective Manner.

Standard of practice 1.1: Purchase cyanide from certified manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 1.1**

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

Kışladağ purchases cyanide from suppliers where the cyanide has been manufactured at a facility that is certified as being in compliance with the Code.

The mine has obtained solid cyanide briquettes from the following companies since the previous recertification audit.

- Cyplus Wesseling, Germany (Cyplus);
- Hebei Chengxin Co., Ltd., P.R.. China (Hebei);
- Draslovka Holdings, a.s., Czech Republic (Draslovka);
- Australian Gold Reagents (Pty) Ltd, Australia (AGR);
- Cyanco Company, United States of America (Cyanco).

Kışladağ entered into a contract with Hebei at the start of 2023 which was still in operation at the time of the audit. Individual loads have previously been obtained from the other producers listed above. At the time of the site visit all solid cyanide is being supplied by Hebei.

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

Principle 2 – Transportation

Protect Communities and the Environment During Cyanide Transport.

Standard of practice 2.1: Require that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training and emergency response.

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 2.1**

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 2.1 requiring that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training and emergency response.

The operation has chain of custody records or other documentation identifying all transporters and supply chains responsible for transporting cyanide from the producer to the operation. All of the solid cyanide is shipped to the Port of Izmir in Turkey and subsequently transported by road to the mine by To-Pet Petrol Ürünleri Dağ. ve Paz. San. Tic. A.Ş. (To-Pet), irrespective of the company producing the solid cyanide.

Hebei: The mine has a contract with Hebei that started in 2023 which was still in operation at the time of the audit

This supply of solid cyanide is undertaken in compliance with Hebei's Global Ocean Supply Chain and Turkey Supply Chain.

Cyplus: The Supply of solid cyanide is undertaken in compliance with Cyplus Supply Chain #1 Wesseling Plant to International Ports of Entry .

Draslovka: The transport of solid cyanide is undertaken in compliance with the Draslovka Czech Republic Supply Chain No.1.

AGR: The transport of solid cyanide is undertaken in compliance with the AGR Europe Supply Chain.

Cyanco: The transport of solid cyanide is undertaken in compliance with the Cyanco Global Ocean Supply Chain including a due diligence investigation on the Port of Izmir in 2024.

All identified transporters are included in the Supply Chains for the various solid cyanide producers as detailed below. To-Pet is the only transport company in Turkey that is certified with the ICMI to transport solid cyanide and transports all of the solid cyanide, irrespective of the producer, from the Port of Izmir to the mine.

- Hebei's Global Ocean Supply Chain and Turkey Supply Chain.
- Cyplus Supply Chain #1.
- Draslovka Czech Republic Supply Chain No.1.
- AGR Europe Supply Chain.
- Cyanco Global Ocean Supply Chain including a due diligence investigation on the Port of Izmir in 2024.

Review of the ICMI website confirmed that the Supply Chains and the Turkish transporter To-Pet are all certified as being in full compliance with the Code over the past three years since the previous recertification audit.

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Principle 3 – Handling and Storage

Protect Workers and the Environment During Handling and Storage.

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

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

Kışladağ mine only receives cyanide as dry briquettes in Intermediate Bulk Container (IBC) bag-in-box. The boxes are delivered in shipping containers that are unloaded into various storage sheds around that mine.

There are three mixing facilities, two for the South ADR Plant and one for the North ADR Plant where the briquettes are loaded directly into a mixing tank (one for each facility), the briquettes are then dissolved creating liquid cyanide that is subsequently transferred to a storage tank (one for each facility).

In addition, the mine has an SLS Container Filling Station where an Isotainer is filled with cyanide briquettes. Once full the tanker is transported to one of the two SLS Mixing Stations, one for the South HLF and one for the North HLF. The Isotainer is filled with water and the briquettes are allowed to dissolve before the liquid cyanide is then pumped into a storage tank.

The North HLF, ADR Plant and associated unloading, storing and mixing facilities have been constructed since the previous recertification audit was undertaken.

The all of the unloading and storage facilities including the new facility designs for the North HLF, ADR, Mixing Facility, Storage Shed and SLS Mixing Station were administered through

Kışladağ's Management of Change process and strict engineering construction monitoring and sign-off were undertaken to ensure all construction was undertaken in accordance with the cyanide producers' guidelines, applicable jurisdictional rules and/or other sound and accepted engineering practices. Cyplus has confirmed that the storage facilities were constructed in accordance with their requirements.

The following were confirmed by the auditors during the site visit. The solid cyanide unloading and storage facilities, mixing and liquid cyanides storage tanks are located away from people and surface waters. The mine is located several kilometres from the nearest residencies and all unloading, storage and mixing facilities 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 ponds or stormwater ponds and not released to surface water.

The unloading areas in both the North and South SLS Mixing Stations, and the SLS Cyanide Warehouse are located on concrete preventing any seepage to the subsurface. Any leak drains by gravity to the bund for the respective Dosing Tank. Any spillage in the bund for the Dosing Tanks is automatically pumped to the relevant Barren Pond.

In addition, the various facilities where the tanks and storage areas are located e.g. ADR Facilities, SLS Mixing Facilities, etc. are underlain by an HDPE Liner with leak detection systems.

All cyanide mixing and storage tanks are fitted with tank level indicators and high-level alarms that can be monitored from the central control rooms at the North and South ADR Facilities and the North and South SLS Mixing Facilities. 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.

The process for the dissolution of the cyanide briquettes in the SLS Isotainer is not allowed to start unless the Dosing Tank to which it is being pumped is less than 50% full. The capacity of the Isotainer is less than 50% of the relevant Dosing Tanks preventing the possibility of overfilling the Tanks.

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.

The following was confirmed during the site inspection.

- 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 ingress.

- It was observed during the site inspection that all of the warehouses storing solid cyanide were adequately ventilated. The cyanide Mixing Tanks and Dosing Tanks are all in an open air environment fitted with ventilation pipes.

- 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. All of the tanks containing liquid cyanide are located within the larger mine site that is fenced and accessed controlled. The areas where the tanks are located are monitored 24/7 by security cameras.

- The solid cyanide is stored in dedicated warehouses with no incompatible materials. The Cyanide Mixing and Dosing Tanks are also located separately from any incompatible materials being situated within their own dedicated bunds.

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

Procedures are in place and implemented to manage empty cyanide containers including the following.

- The empty storage containers (comprising wooden boxes, bulk bag inners and plastic bags liners) are dismantled and stored in a dedicated area of the cyanide warehouses. The empty containers are subsequently packed in containers to prevent any unauthorised use of the boxes and transported by a licensed hazardous waste transportation company to a licensed incinerator that is able to take hazardous waste. This is detailed in Cyanide Management Plan.

- The woven polypropylene bags, outer plastic bags, and boxes are not washed prior to being stacked in the cyanide warehouses and subsequently transported to the incinerator. This is acknowledged by the hazardous waste transported and the incinerator as standard procedure and the necessary health and safety precautions are undertaken when unloading the containers. This is detailed in the Job Safety Analysis for (Cutting, Proper Stacking and Truck Loading of Waste Cyanide Crates).

- The empty storage containers (comprising wooden boxes, bulk bag inners and plastic bags liners) are incinerated at a licensed incinerator able to take hazardous waste and includes energy recovery.

- The woven polypropylene bags, outer plastic bags, and boxes are not washed prior to being stacked in the cyanide warehouses and subsequently transported to the incinerator. This is acknowledged by the hazardous waste transporter and the incinerator as standard procedure and the necessary health and safety precautions are undertaken when unloading the containers.

The operation has developed and implemented the following procedures to prevent exposures and releases during cyanide unloading and mixing activities.

a) Sodium Cyanide Solution Preparation, details the operation of all hoses, valves and couplings for the mixing of solid cyanide.

   SLS Preparation and Dissolving details the operation of all hoses valves and couplings for the dissolution of solid cyanide in the SLS isotainers and the subsequent drainage into the Dosing Tanks.

   The maintenance of all hoses, valves and couplings are included in the preventative maintenance system.

b) Sodium Cyanide Solution Preparation, details how cyanide containers should be handled without rupturing or puncturing.

c) Stacking of individual cyanide boxes within the warehouses is limited to three high, well within the maximum loading capacity of the wooden boxes.

d) 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 solutions would flow via drainage channels to one of the solution ponds. The response to any spill is detailed in Emergency and Crisis Management Plan.

e) The cyanide mix procedures stipulate personal protective equipment (PPE) requirements (full Tyvek coveralls, chemical gloves and boots, full-face respirator and portable hydrogen cyanide (HCN) meter) and require operators to inspect their respirator and filters prior to starting a mix. The requirement for a minimum of two operators in full PPE during the mix with a dedicated person in the control room watching via camera is detailed in Sodium Cyanide Solution Preparation procedure.

f) Procedures Sodium Cyanide Solution Preparation procedure and SLS Preparation and Dissolving procedure include the addition of synthetic colourant dye to assist with the identification of potential reagent leaks.

Principle 4 – Operations

Manage Cyanide Process Solutions and Waste Streams to Protect Human Health and the Environment.

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The operation has written management and operating plans and procedures for cyanide facilities including unloading, mixing and storage facilities, process plants (ADR plants) and heap leach operations.

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. Within the SIMS Cyanide Management Plan (CMP) provides a detailed description of Tüprag's ICMC compliance program. The CMP is supported by the Emergency & Crisis Management Plan (ECMP). The CMP provides general information on cyanide chemistry, toxicity, and safety handling, and establishes overall requirements for the following:

- 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.

In addition to this the Mine has a number of specific Standard Operating Procedures (SOPs) to provide more details with regards to specific activities.

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

The CMP includes details of the Operations Activities in Section 5.5 providing an overview of the operation of the Heap Leaches and the ADRs including an overview of their specifications. The process results in no discharges of effluent or contaminated water to the environment. The site is able to cope with a 1:10,000 year 24 hr storm event as detailed in the site water balance due to the large size of the stormwater ponds. PRP5 has a capacity of 448,986 m^3 for the South Heap Leach and SWP-2 has a capacity of 299,442 m^3 for the North Heap Leach.

The ponds are separated between those containing Leach Solution i.e. cyanide containing solutions and those designed to store stormwater runoff from the site. All of the Leach Solution ponds are covered either with bird balls or netting in addition to perimeter fencing to prevent access by wildlife.

The CMP states that "the pH of the cyanide solutions to be prepared shall be kept at 11.5 and above". It also states that the solution that is "sent from the Barren Pond to the Leach Pad shall be adjusted to keep the HCN formation to a minimum". The free cyanide concentration in the Barren Solution applied to the Leach Pads is approximately 500 mg/l as checked by manual titration every two hours.

The operation has plans and procedures that describe the standard practices necessary for the safe and environmentally sound operation of the facility including the specific measures needed for compliance with the Code, such as water management, inspections and preventive maintenance activities.

Water Management

The Mine has a Site Water Management Plan that provides details of the following:

- Water Balance and Water Supply;
- Water and Wastewater Management;
- Management of Domestic Wastewater;
- Monitoring; and
- Reporting.

The mine also has a probabilistic water balance using the GoldSim software. The site has zero discharge to the environment having sufficient storage capacity within their stormwater ponds to contain a 1:10,000 year 24 hr storm event.

In addition, there is a procedure for Solution Management in Case of Excessive Rainfall that includes the treatment of contaminated water with hydrogen peroxide to breakdown the cyanide before it is discharged. This procedure has not been used to date.

Inspections

The operation continues to inspect cyanide facilities on an established frequency sufficient to assure and document that they are functioning within design parameters. This includes the following.

Daily: Daily Process ADR Environmental Checklist; North ADR Daily Control Form; South ADR Daily Control Form; Process South HLF Daily Checklist; and Process North HLF Daily Checklist.

Weekly: South HLF Ponding Weekly Checklist; and North HLF Ponding Weekly Checklist.

Monthly: South ADR Monthly Inspection; North ADR Monthly Inspection; SLS Filling Station Monthly Inspection; South SLS Preparation Building Monthly Inspection; New Cyanide Storage Monthly Inspection; South HLF Stacking Operations Monthly Inspection; North HLF Stacking Operations Monthly Inspection; and North SLS Preparation Monthly Inspection.

Semi-annual: Leach Pad Diversion Ditches Checklist.

The Daily 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.

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.

Daily 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.

In addition, the following inspections are undertaken by a third party.

- Annual check of tanks and pipelines, undertaken by Szutest.
- Thickness testing of the tanks, undertaken by Antalite, dated 14 February 2024, and is valid for 5 years.

Preventative Maintenance

The mine continues using the Systeme, Anwendungen und Produkte (SAP) software for managing the preventative maintenance system (PMS). The PMS addresses major machinery, tanks, pumps, valves, and other equipment associated with the management of cyanide 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.

The operation implements procedures to review proposed changes to production processes, operating practices, or cyanide facilities to determine if they may increase the potential for cyanide releases and worker exposures and incorporate any measures necessary to protect worker health and safety and the environment. The mine 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 operation has cyanide management contingency procedures for non-standard operating situations that may present a potential for cyanide exposures and releases.

a) In situations where there is an upset in the water balance from severe weather conditions the mine has a procedure procedure for Solution Management in Case of Excessive Rainfall. This procedure describes how excess runoff is diverted to the various stormwater ponds and if necessary, irrigation of the heap leaches ceases.

   The mine also has a back-up contingency for excess runoff to be treated with hydrogen peroxide in one of the stormwater ponds to ensure that WAD cyanide is below 0.022 mg/l before it can be discharged. This contingency has not been used to date. The addition of pond PRP-5 with almost 500,000 m^3 additional capacity makes it extremely unlikely that this contingency will need to be used.

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

c) 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 the procedures set out in the Kişladağ Gold Mine Closure Plan would be followed.

These procedures sufficiently address how cyanide would be safely managed during long-term shutdowns or cessation of operations including the management of any cyanide solution within tanks. Solid cyanide stored in Intermediate Bulk Containers would remain in the storage shed.

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

Tanks holding cyanide solutions are inspected for signs of corrosion and leakage as part of the following inspections; North ADR Daily Control Form; South ADR Daily Control Form; South ADR Monthly Inspection; North ADR Monthly Inspection; SLS Filling Station Monthly Inspection.

The structural integrity of the tanks is undertaken through the following inspections:

- Annual check of tanks and pipelines, undertaken by Szutest.
- Thickness testing of the tanks is undertaken by Antalite, dated 14 February 2024, and is valid for 5 years.

All cyanide mixing and storage tanks are located within concrete bunds designed to contain greater than 110% of the largest tank volume and to prevent seepage to the subsurface. The concrete bunds were observed to be in good condition and provide a competent barrier to leakage. The bunds are fitted with automatic sump pumps that will pump any spill to the relevant Barren Pond.

Solution strength cyanide is pumped from the Dosing Tanks in the North and South ADRs and the North and South SLS Mixing Facilities to the relevant Heap Leach for irrigation. The ADRs and the SLS Mixing Facilities are constructed in an area that is underlain by the containment system for the Heap Leach Facilities i.e. a combination of low permeability clay and High Density Polyethylene (HDPE). Any spill from pipes within the ADRs and SLS Mixing Facilities will be contain within the bunds or the concrete floor of these facilities. Outside of these facilities any spill will be directed by the leak detection layer within the containment system to the relevant Barren Pond. Any leaks on the Heap Leaches will be captured as part of the pregnant solution. The ADR Daily and Monthly Inspections include inspections of the secondary containments provided for the tanks and pipelines including the physical integrity, the presence of fluids, and the available capacity.

The CMP states the following with regards to the leak detection system for the North and South Leach Pads “The leakage detection system for the heap leach area covered with liner layer shall be placed along the cell separation bumps where the solution is accumulated, thus presenting higher risk of leakage. Leakage detection system shall comprise the “STRIPDRAIN”, a plastic drainage material covered with geotextile material or equivalent product. The leakage detection system shall not interrupt the robustness and integrity of the synthetic LDPE covering above. STRIPDRAIN leakage detection system shall transit to a

hard pipe at the end of the heap leach cell stretching throughout the soil bump between the cell and the solution collection channel. The hard pipe extending from the leakage detection system shall penetrate the liner cover on the solution collection channel and discharge directly to the solution collection pond. This arrangement shall allow the monitoring of any leak in heap leach cells and facilitates control and inspection of leakage detection systems of individual cells. In case of any leakage, the leak is discharged back to the liner covered containment area, allowing measurement of flow rate."

With regards to the solution ponds the CMP states the following "Geonet leakage detection system shall be placed between two synthetic layers to access the leakage detection pits at the corner of each pond covered with double-layer liner. Access to leakage detection pit shall be provided using a pipe of 200 mm diameter laid between liners and passing through the primary liner on top of the ponds. Pipes of this size enable placement of a small pump to drain the leakage detection pit when necessary." Documented daily inspections are conducted to monitor the leak detection and collection systems at the leach pads and solution ponds.

Pipelines, pumps and valves containing cyanide solution are inspected for deterioration and leakage as part of the following inspections (dates of the forms observed): North ADR Daily Control Form; South ADR Daily Control Form; South ADR Monthly Inspection; North ADR Monthly Inspection; SLS Filling Station Monthly Inspection. In addition, pumps and valves are part of the PMS with maintenance inspections undertaken on a regular basis as dictated in the SAP System.

The CMP states that the Process Solution Ponds will maintain a freeboard of 1 m above the level of the solution. The ponds are inspected daily using the Cell Return Checklist. In addition, the ponds are inspected as part of the South and North ADR Monthly Inspections. In the event of high rainfall the CMP details the ponds that will be used to store runoff and additional percolate from the Heap Leaches in the event of a storm. The integrity of surface water diversions is inspected on a bi-annual basis as detailed in the Leach Pad Diversion Ditches Checklist.

The operation inspects the cyanide facilities on an established frequency sufficient to ensure and document that they are functioning within design parameters.

All staff have been trained that any wildlife mortalities are to be immediately reported and logged on the Wildlife Mortality Reporting Form. There have been 12 reported mortalities since the previous recertification audit, the majority of which were due to collisions with vehicles. There were two birds that died on separate occasions at the ADR buildings.

The inspections are documented. The checklists identify the specific items to be observed and include the date of the inspection, the name of the inspector, and any observed deficiencies, the corrective actions are documented, and the records are retained.

The SAPS system used for the Planned Maintenance identifies specific items to be observed and the date of the inspection. The name of the inspector, and any observed deficiencies are detailed on the work order together with the corrective actions. These documents are retained within the SAP system.

The operation has the necessary emergency power resources to operate pumps and other equipment to prevent unintentional releases and exposures in the event its primary source of power is interrupted. The Kışladağ Gold Mine is connected to the national grid via a local

substation. The mine has seven 1,600-kilovolt Ampere (kVA) diesel generator sets onsite dedicated to the backup operation of major pumps and other key infrastructure associated with the Leach Pads and the ADRs. The generators undergo routine maintenance every two months in addition to the loaded test as detailed in the PMS.

If for any reason the power supply were to fail irrigation of the Leach Pads would cease with pregnant solution continuing to drain to the solution ponds. If the storage capacity of the Barren Solution Ponds were to be exceeded due to the lack of irrigation the Stormwater Ponds can be used for emergency storage of solution. There is sufficient capacity within the Stormwater Ponds to accommodate all of the solution from the Leach Pads. This is detailed in the Site Water Management Plan.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 4.2**

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.2; introducing management and operating systems to minimise cyanide use.

The operation does not use cyanide in the mill as the operation is a Heap Leach operation and does not use mill-based mineral extraction technology. However, the mine continues to optimise its use of cyanide. Samples are taken from the crushing plan on a shiftly basis to create a composite sample which undergo a series of tests including intermittent bottle roll tests, and column tests.

The recovery profile of the pregnant solution is then compared against the results of these tests with the cyanide levels of the irrigation solution being adjusted to maintain optimal extraction. Manual titration of the irrigation solution is undertaken every 2 hours to confirm the level of free cyanide in the solution.

The CMP details the Leach Solution Management process by which the irrigation of the cells is increased over time with the first 100 days of a stack being critical for optimal gold recovery.

The North Heap Leach is being constructed to allow the cyanide concentration of the irrigation solution to be adjusted on a cell by cell basis. In addition, the mine has been investigating the vertical irrigation of stack in areas of low permeability.

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

The operation is	☒ **in full compliance with**	**Standard of Practice 4.3**
	☐ in substantial compliance with	
	☐ not in compliance with	

Summarise the basis for the findings/deficiencies identified.

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

The operation has developed a comprehensive, probabilistic water balance. Kışladağ Gold Mine Water Balance includes the South and North Heap Leaches, all of the ponds on site, the ADRs, boreholes and the possibility of abstraction from a surface water dam approximately 5 km from the mine, although this has never been used.

At the time of the previous recertification audit a Microsoft Excel based water balance was used. This has subsequently been replaced with a GoldSim probabilistic water balance that models the flow of water across the mine site. This model was created for the site by WSP however, Tuprag has dedicated staff who maintain the model. .

The model uses the daily precipitation records from the municipal meteorological station for the last 70 years, together with site data for the last 19 years to model the uncertainty and variability in the prediction of precipitation patterns, including the ability to consider the frequency and distribution of precipitation events along with extremes and seasonal variations.

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

a) The rates at which solutions are applied to the North and South Heap Leach Pads are included in the model.

b) It is possible to alter the storm duration and return interval within the model. The model is run weekly to provide a water balance report to the mine, which includes the 1:100 yr, 1:500 yr, and 1:10,000 yr 24 hr storm events in addition to the Probably Maximum Precipitation (PMP).

c) There is a weather station on site that provides information with regards to precipitation and evaporation on a daily basis that is used within the model showing that the model uses data that represent actual site conditions. The model is updated on an annual basis with this data.

d) The model includes a catchment for each of the ponds and for the Heap Leach Pads. This provides the amount of water resulting from surface run-on. The elevation is part of the catchment data. The infiltration of precipitation is also included in the model.

e) The effects of freezing and thawing on the accumulation of precipitation are minor being limited to snow accumulating on the Heap Leaches. This is taken account of within the model.

f) The is no discharge to the environment. The only additional solution losses are due to seepage to the subsurface, which is minimal due to the lining of the Leach Pads. This is included in the model.

g) The model is able to simulate a potential power outage and the effect on drain down from the leach pads and the effect on the solution ponds. The mine has sufficient generators that there is a back-up in the event of a power failure. There is also sufficient capacity in the ponds to provide capacity for the drain down without having to discharge to the environment.

h) There is a procedure for Solution Management in Case of Excessive Rainfall that includes the treatment of contaminated water with hydrogen peroxide to breakdown the cyanide before it is discharged. This procedure has not been used to date and there has been no discharge to the environment due to the capacity of the storm water ponds. The water balance can model the storage capacity of the entire site in order to ascertain whether a discharge to the environment is likely.

i) There are no other aspects of facility design that can affect the water balance.

Ponds and impoundments are designed and operated with adequate freeboard above the maximum design storage capacity determined to be necessary from water balance calculations. The solution ponds are operated with at least a 1 m freeboard. The levels of the process pools are monitored hourly by ADR operators in each shift who can divert solution via the pumps and pipelines in order to maintain the freeboard.

In the event of excessive rain or power outage (although the back-up generators should provide sufficient power) the actions required to divert solution to the various other ponds is described in the Solution Management in Case of Excessive Rainfall Procedure.

The site is able to cope with a 1:10,000 year 24 hr storm event as detailed in the site water balance due to the large size of the stormwater ponds. PRP5 has a capacity of 448,986 m^3 for the South Heap Leach and SWP-2 has a capacity of 299,442 m^3 for the North Heap Leach.

The operation's operating procedures incorporate inspection and monitoring activities as necessary to implement the water balance and prevent overtopping of ponds and impoundments and unplanned discharge of cyanide solutions to the environment. The levels of the process pools are monitored hourly by ADR operators in each shift who can divert solution via the pumps and pipelines in order to maintain the freeboard.

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 event ponds are kept empty wherever possible.

The operation measures precipitation, comparing the results to design assumptions and revising operating practices as necessary. Precipitation and evaporation data are collected daily from the on-site meteorological station located just north of the mine pit. This data is input to the water balance model on an annual basis. The model is calibrated using the volume of run-off collected in the stormwater ponds.

The meteorological station CR-1000 unit and sensors are sent to the State Meteorological Calibration Centre based in Ankara for calibration every 2 years.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 4.4**

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.4; implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

The operation has open water where it is necessary to implement measures to restrict access by wildlife and livestock as the WAD cyanide exceeds 50 mg/l in the process ponds.

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 both pond areas i.e. those associated with the South Heap Leach and those associated with the North Heap Leach. 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 or netting as observed during the site visit.

The open water on the mine is limited to the solution and stormwater ponds associated with the North and South Heap Leach Pads. The stormwater ponds are kept empty whenever possible so that they can accommodate a storm event.

All staff have been trained that any wildlife mortalities are to be immediately reported and logged on the Wildlife Mortality Reporting Form . There have been 12 reported mortalities since the previous recertification audit, the majority of which were due to collisions with vehicles. There were two birds that died on separate occasions at the ADR buildings. This demonstrates that the use of bird balls and netting to prevent access to the solution ponds by wildlife is successful.

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.

The mine has 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.

The Leach Pads are inspected for ponding on a daily basis and if any ponding is observed the following procedure is instigated; Intervention in Small Amounts of Material Flow at the Leachpad Site and Intervention in Solution Ponding at the Leachpad Site .

Where ponding on top of the Heap Leach is observed the area is ripped using a Dozer with the appropriate attachment.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 4.5**

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The Kışladağ process circuit is designed and operated as a closed circuit with zero discharge to surface and groundwater. Nevertheless, the mine 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 Eylul University - Environment Department Laboratory (Turkey), as an Accredited Environmental Laboratory from four sites, Savak2, Savak3, Savak6, and Savak7 and analysed for Free, WAD and Total Cyanide. All of the surface water is seasonal with the nearest permanent water body being approximately 80 km from the mine. The data is sent to the regulator.

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 is prescribed for the protection of drinking water and aquatic life. Based on a review of monitoring results, Total Cyanide meets this strictest standard. The results for 2022 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.

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The CMP states the following with regards to the leak detection system for the North and South Leach Pads. “The leakage detection system for the heap leach area covered with liner layer shall be placed along the cell separation bumps where the solution is accumulated, thus presenting higher risk of leakage. Leakage detection system shall comprise the “STRIPDRAIN”, a plastic drainage material covered with geotextile material or equivalent product. The leakage detection system shall not interrupt the robustness and integrity of the synthetic LDPE covering above. STRIPDRAIN leakage detection system shall transit to a hard pipe at the end of the heap leach cell stretching throughout the soil bump between the cell and the solution collection channel. The hard pipe extending from the leakage detection system shall penetrate the liner cover on the solution collection channel and discharge directly to the solution collection pond. This arrangement shall allow the monitoring of any leak in heap leach cells and facilitates control and inspection of leakage detection systems of individual cells. In case of any leakage, the leak is discharged back to the liner covered containment area, allowing measurement of flow rate.”

With regards to the solution ponds the CMP states the following “Geonet leakage detection system shall be placed between two synthetic layers to access the leakage detection pits at the corner of each pond covered with double-layer liner. Access to leakage detection pit shall be provided using a pipe of 200 mm diameter laid between liners and passing through the primary liner on top of the ponds. Pipes of this size enable placement of a small pump to drain the leakage detection pit when necessary.”

The beneficial use of groundwater downgradient of the mine is likely to be limited to agricultural use with potable water for domestic used being supplied by the municipality.

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

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. The site has 26 groundwater monitoring boreholes.

Groundwater samples are collected monthly from each of the boreholes. The sampling is undertaken by DEU and the samples analysed by Tüprag has a contract with ALS (Canada), Dokuz Eylul University - Environment Department Laboratory (Turkey), as Accredited Environmental Laboratories. 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 2022 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 of 0.005 mg/l during this period. No remedial activity has therefore been required.

There is no underground backfill as the mine is an opencast operation.

This is no seepage from the site to groundwater as the monitoring shows concentrations to be below detection limit of 0.005 mg/l WAD and total cyanide.

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

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

In addition, the various facilities e.g. ADR Facilities, SLS Mixing Facilities, etc. where the tanks are located are underlain by an HDPE Liner with leak detection systems.

There is sufficient capacity within the Stormwater Ponds to accommodate all of the solution from the Leach Pads.

The CMP states for the South ADR Plant the total volumes of secondary barriers are as follows:

- 175.5 m^3 for Carbon Column Strings A-B (String A is decommissioned) and South ADR (largest tank is Cyanide Solution Storage Tank 70 m^3);
- 16.2 m^3 for the Cyanide Preparation and Mixing Area (largest tank 10 m^3);
- 13.5 m^3 for Acid Area (largest tank 10 m^3);
- 36.25 m^3 for Carbon Column String C (largest tank 36 m^3);
- Carbon Column Strings D-E concrete bund is 622 m^3) (largest tank 40 m^3); and
- Carbon Column Strings F-G concrete bund is approximately 900 m^3.

Drainage channels from these areas are connect to pond PSP-1 that has a capacity of 7,044 m^3.

The CMP states for the North ADR Plant the total volumes of secondary barriers are as follows:

- 115 m^3 for the H-I-J-K Carbon Colum Strings (largest tank 36 m^3).
- 180 m^3 for the Cyanide Preparation and Mixing Area (largest tank 114 m^3);
- 215 m^3 for the Carbon tank area (largest tank 64 m^3);
- 61.4 m^3 for the Stripping Area (largest tank 52 m^3);

These areas also have a drainage pump that can be diverted to the pool BSP-2 when necessary. The BSP-2 has a capacity of 22,338 m^3.

In addition, there are the unloading tanks at the SLS Mixing Facilities. The SLS Mixing Facility for the South Heap Leach has an unloading tank with a capacity of 203 m3 and a bund with capacity of 231 m3. The SLS Mixing Facility of the North Heap Leach has an unloading tanks with a capacity of 156 m^3 and a bund with a capacity of 185 m^3.

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 the 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. This has not been used to date and there has been no discharge to the environment.

There are no cyanide process tanks without secondary containment. Spill prevention or containment measures are provided for all process solution pipelines to collect leaks and prevent releases to the environment. There are no areas where cyanide pipelines present a risk to surface water.

All cyanide unloading, mixing, storage and process tanks are constructed from carbon steel. All cyanide solution pipelines and piping system components are constructed of HDPE, stainless steel, or carbon steel; with all of these materials being compatible with cyanide and high pH conditions.

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

The operation is

☒ in full compliance with

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

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

Quality assurance and quality control (QA/QC) programs have been implemented during construction of the cyanide facilities. Previous recertification audit reports provide details of the QA/QC programmes for the various constructions that were undertaken within the relevant periods of the previous audits. It was confirmed by the auditors that the QA/QC documentation as detailed in the previous recertification audits has been retained by the mine.

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

- North ADR Plant.
- North Carbon in Columns (CIC).
- North Ponds.
- North Cyanide Warehouse and Mixing Plant.
- North SLS Mixing Plant.
- North Heap Leach Pad.
- Connection ditches between SWP pond and PRP-5 pond.
- Connection line between PRP-4 pond and the Northern ponds.

Review of engineering records for these construction projects indicate QA/QC programs were 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.

Hard copy records of recent construction are currently held in the Construction Operations office prior to archiving with electronic copies held on the Intranet. Hard copy engineering and QA/QC records are stored in an archive library with electronic copies being stored electronically.

The QA/QC documents addressed the suitability of materials and adequacy of soil compaction for earthworks such as tank foundations and earthen liners, the installation of synthetic membrane liners used in ponds and leach pads, and for construction of cyanide storage warehouses and process tanks.

An appropriately qualified person has reviewed the cyanide facility construction and provided documentation that the facility has been built as proposed and approved. These consist of various engineers or professionally qualified individuals with the necessary experience to sign off the various reports and documents on behalf of the various companies.

In addition, to the QA/QC documentation the following inspections have been undertaken.

- Kışladağ Mine, South Heap Leach Facility, Interlift 1, Cells 10 – 13, Stability Report – The Mines Group, 12 August 2024. Demonstrated that the South Hepa Leach is stable. Signed off by Andrew Crews Registered Professional Engineer no. 8427.
- Annual check of tanks and pipelines, undertaken by Szutest..
- Thickness testing of the tanks is undertaken by Antalite dated 14 February 2024, which is valid for 5 years.

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

The operation is

☒ in full compliance with

☐ in substantial compliance with **Standard of Practice 4.9**

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

Tüprag has a Monthly Water Quality Monitoring Procedure detailing how water quality monitoring is undertaken in accordance with Environmental Impact Assessment (EIA) commitments, the Turkish Water Pollution Control Regulations (2004); the Protection of Underground Water Against Pollution Regulations, (2012), and the Surface Water Quality Regulations (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, which were observed by the auditors.

All staff have been trained that any wildlife mortalities are to be immediately reported and logged on the Wildlife Mortality Reporting Form .

The sampling and analytical procedures have been developed by an appropriately qualified person. 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 current External Affairs Manager and Environment Chief are responsible for managing the environmental programs, preparing environmental reports for submission to the Turkish Government, and reviewing and updating environmental procedures as needed. They are 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 Monthly Water Quality Monitoring Procedure details the sampling methods including purging monitoring wells, selection and labelling 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 analysed, the number of QA/QC duplicate samples to be collected each month, and the cyanide species to be analysed.

A log sheet is used to record field information including 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 is undertaken at frequencies to adequate to characterise the medium being monitored, and to identify changes in a timely manner.

WAD cyanide monitoring is undertaken at the following locations and frequencies.

- Groundwater boreholes are sampled monthly.
- Surface water monitoring locations are sampled monthly.

In addition, the following monitoring is undertaken:

- Leach Pad leak detection systems are monitored on a daily basis.
- Level of process ponds (hourly).
- Geotechnical monitoring of the stability of the Heap Leaches is undertaken on a continuous with GeoRadar, hourly with prizm, and 11 days with InSAR (Interferometric Synthetic Aperture Radar) to see ground deformation and stabilization of HLPF
- Wildlife mortality is monitored on an on-going basis.
- The pH and free cyanide levels of the Barren Solution irrigating the Heap Leaches is monitored every 2 hours by manual titration.

Principle 5 – Decommissioning

Protect Communities and the Environment from Cyanide Through Development and Implementation of Decommissioning Plans for Cyanide Facilities.

Standard of practice 5.1: Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife, livestock, and the environment.

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

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

Tüprag has an updated version of the Kışladağ Gold Mine Closure Plan 2023, Version 3, dated 25 January 2025 to evaluate and ensure compliance with; jurisdictional requirements, Eldorado Gold Sustainability Integrated Management System (SIMS), Towards Sustainable Mining (TSM) Mine Closure Framework, and ICMI Cyanide Management Code Principles.

This Plan adequately addresses decommissioning, which is the aspect of closure that addresses the cyanide remaining on site upon cessation of production activities and prepares the site for its closure and post closure period including the management of reagent strength cyanide and process solutions remaining in storage and production facilities. Additionally, Eldorado Gold 2024 Sustainability Report includes closure aspects in Section 4-Healthy Environments Now and for the Future.

Reclamation planning is an integral part of the environmental impact assessment (EIA) process that must be implemented with each major leach pad expansion. The Government Forestry Directorate was responsible for review and approval of the 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.

Based on the Eldorado's Internal Code for Self-Insurance of Decommissioning and Closure Liabilities, dated 26 June 2025, the agreed upon procedures with KPMG were performed on

data included in the Kişladag 2024 Asset Retirement Obligation (ARO) Closure Cost Estimate dated 13 January 2025. It has identified that the following project components and their elements constitute cyanide-specific decommissioning costs:

a) North Heap Leach Pad;
b) South Heap Leach Pad;
c) Heap Leach Fluid Management;
d) Ponds;
e) Evapotranspiration Cells;
f) North ADR and Processing Facilities;
g) South ADR and Processing Facilities; and
h) Concentrate and Treatment Plants.

During decommissioning all cyanide operating plans, procedures and emergency response capability will remain in place.

Tüprag's Cyanide Closure Plan includes a 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. Section 5-Implementation of the 2023 Closure Plan provides schedules for implementing reclamation and closure of the mining operation. Tables 27, 28, and 32 of Section 5 (North and South Leach Facilities) provide a detailed breakdown and work descriptions for closure and reclamation of the heap leach facilities, and decontamination, dismantling and demolition of the treatment plant process areas and warehouses.

It is stated in the Cyanide Management Plan, Section 5.6 Closure that Kışladağ Gold Mine shall revise and update the externally validated Cost Estimate Report on Closure of the Cyanide Plants every 3 years or upon any changes affecting the closure of the Cyanide Plants. The Closure Plan was updated in 2025 (version 3) to evaluate and ensure compliance with jurisdictional requirements, Eldorado Gold SIMS, TSM Mine Closure Framework and ICMC. Internal updates to the cost estimate included in the Closure Plan are undertaken annually.

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

	☒ **in full compliance with**	
The operation is	☐ in substantial compliance with	**Standard of Practice 5.2**
	☐ not in compliance with	

Summarise the basis for the findings/deficiencies identified.

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

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

The Okane Consultants, Saskatoon, Canada estimated Kışladağ ARO Closure Cost Estimate, dated January 2025 provided a cost estimate to fully fund third party implementation of the cyanide-related decommissioning measures. The cost estimate is based on the following assumptions:

- All equipment and assets will have 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 conducted at Kışladağ; and
- A contingency value of 20% has been added to the total cost for closure of the industrial site, open pit, mine rock depository, heap leach pads (South and North facilities), plant and processing facilities and monitoring and management.

The Cyanide Closure Plan is updated annually. The Plan contains a cost estimate to fully fund third party implementation of the cyanide-related decommissioning measures. This cost estimate is validated every three years by an external party but is updated annually by the mine. This internal update is included in the Cyanide Closure Plan on an annual basis with the third year being externally validated. In addition, Eldorado conducts quarterly reviews of the Asset Recovery Obligations of all its projects, including Kışladağ.

There is no established financial assurance required by the Turkish jurisdiction to cover estimated costs of cyanide related decommissioning activities. The operation has established a self-guarantee mechanism to cover the estimated costs for the cyanide-related decommissioning activities as identified in the Decommissioning Plan.

The operation provided a statement by a qualified financial auditor (KPMG) that it has sufficient financial strength to fulfil this obligation as demonstrated by an accepted financial evaluation methodology (Canadian Standard on Related Services (CSRS) 4400). Eldorado periodically engages KPMG to conduct independent reviews and provide statements on

Eldorado's financial strength to fulfil its obligations for cyanide-related decommissioning. KPMG LLP is a Canadian limited liability partnership and a member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative. The details of this financial assurance mechanism are consistent with the Canadian Generally Accepted Accounting Principles and are documented in corporate practice "*Eldorado's Internal Code for Self-Insurance of Decommissioning and Closure Liabilities*", dated June 26, 2025, which has demonstrated that Eldorado has sufficient assets.

KPMG agreed with the findings of each of specified auditing procedure used to demonstrate that Eldorado is in good financial standing and has substantial cash reserves to satisfy the ICMC requirements for self-insurance as detailed in the KPMG Agreed Upon Procedures Report dated 17 July 2025.

Principle 6 – Worker Safety

Protect Workers' Health and Safety from Exposure to Cyanide.

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

Tüprag has developed procedures describing how cyanide-related tasks such as unloading, mixing plant, operations, entry into confined spaces, and equipment decontamination prior to maintenance should be conducted to minimise worker exposure.

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 references Safe Working Procedures and Standard Operating Procedures in the form of Management Procedure Instructions, Non-procedure Instructions, and Job Safety Analyses (JSA) 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. In addition to operating procedures that include instructions for cyanide delivery and unloading, cyanide mixing, refilling, and plant operations. These operating procedures describe the risks associated with specific work tasks and the precautions and safety equipment required to safely complete tasks.

Work orders created in the SAP system for periodical maintenance on cyanide equipment provide information and safety measures for working with cyanide under a "Danger" warning heading. Furthermore, the work order also contains the statement "attach the relevant SOP, JSA and safe work procedure to the work order" from the *Maintenance Procedures for Works Containing Cyanide* table prior to continuing the following maintenance duty. The relevant SOP and JSA details PPE requirements and step by step maintenance procedures including HCN monitoring, and decontamination of equipment/piping, by washing with water, with addition of caustic to raise pH as required, prior to maintenance.

These operating procedures describe the risks associated with specific work tasks and the precautions and safety equipment required to safely complete the tasks. Other general

operating procedures include the requirement for completing a JSA prior to undertaking any non-routine operation or each cyanide offloading operation. The SOP and JSA systems require an assessment for any maintenance operation and for each work order.

Procedures continue to be maintained as controlled documents as detailed in previous ICMC recertification audits as is evidenced by the tracked revision updates recorded on procedures together with the date and approved sign-off for each revision by the Operations Manager.

Tüprag has mandatory workplace requirements for all employees, contractors, suppliers and visitors. These include the use of safety goggles/glasses, safety footwear with toe protection, high visibility protective clothing, hard hat, hearing protection, gloves, as detailed in the Golden Rules Handbook. Operating procedures specify the PPE to be worn as well as other equipment required to safely undertake a task. A hard hat, 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 such as Tyvek coveralls, boots, rubber gloves, and full-face respirators with appropriate filters, 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.

Pre-work inspections are undertaken as detailed in the various SOPs. Pre-work inspections are conducted prior to cyanide unloading and mixing operations. These inspections include a visual inspection of PPE condition, shower/eye wash stations, and when used, checks on the operation of the forklift.

JSA/Safe Working Procedures that must be completed prior to undertaking any non-routine operation where there is no written procedure. The JSA process describes the work to be undertaken, the risks likely to be encountered and control measures to reduce such risks. It also identifies the mandatory PPE required, work permit requirements, and the necessary pre-work inspections prior to the work being undertaken.

Where no JSA or SOP is in place, workers are required to complete a Hazard Awareness Card (Stop, Look, Assess, Manage (SLAM) card) as part of the pre-work inspection to identify hazards and management risks.

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. These include the following.

- Monthly Worker Health and Safety Committee Meetings. These are a statutory requirement in Turkey. These meetings are attended by representatives from the union, employees, the safety department, and management. The forum provides an opportunity for worker representatives to present and discuss suggestions/ recommendations with management.

- Worker Representatives Meetings: These meetings are attended by representatives from each department. The meetings provide an opportunity for clear communication between workers and department heads as a bilateral communication. The minutes of meeting forms are prepared by asking for comments, requests, complaints, suggestions etc. from worker representatives.

- Weekly Toolbox Meetings: Workers have an opportunity to provide input during toolbox meetings. These meetings are held between workers and shift supervisors and provide a venue to discuss safety concerns and opportunities for improvement including cyanide and ICMC awareness discussions.

- A Monthly Safety Performance Report: This sets monthly KPIs and targets for safety. The report requires that, at least on a quarterly basis, the following meetings or processes are followed which also includes worker engagement and feedback:
    - Formal Risk Assessment Update Meetings at which departmental health and safety hazards are identified, and risk assessments thereof are discussed, and
    - Internal Safety Inspections and Safety Task Observations.

- Employee Engagement Program: As a replacement to the suggestion box that was previously used, the operation now encourages engagement of workers with the health and safety system by providing incentives to achieve health and safety targets. This system has resulted in a more transparent and open system of communication. Workers also participate in departmental H&S meetings and departmental toolbox talks and can raise issues regarding improvement of workplace conditions. Additionally, if workers meet H&S targets without accident during operation, Tüprag awards each departmental staff with a quarterly marketing card as a monthly cash bonus for all staff.
- Courageous Safety Leadership Program, is designed to build a strong safety culture by empowering employees at all levels to take personal responsibility for safety. The program encourages individuals to speak up about unsafe behaviours or conditions, make courageous decisions even under pressure, and demonstrate visible commitment to protecting themselves and others
- The Positive Recognition Program, aims to reinforce safe behaviours and promote a culture of appreciation across the organization. The program encourages leaders and peers to actively recognize and reward individuals or teams who demonstrate outstanding safety practices, proactive hazard reporting, and a commitment to continuous improvement.

JSAs, which are undertaken prior to work tasks are prepared with input from workers and their supervisors prior to submission to the Health, Safety and Security (HSS) department for review and authorization. Where no JSA or SOP are in place, workers are required to complete a Hazard Awareness Card (Stop, Look, Assess, Manage (SLAM) card) to identified hazards and manage the risks.

Workers are required to complete a Hazard and Near-miss card when a safety hazard is identified: this includes near-miss reporting. The card is provided to the responsible

supervisor with information also captured electronically on the INX data management system. Corrective actions are tracked to completion.

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

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

The importance of maintaining appropriate pH within the leach circuit is described in the CMP. Solid sodium cyanide briquettes are delivered with a mixture of 0.2-1.0 % caustic soda as a buffer to prevent the generation of HCN gas. There are pH meters at both the South and North ADR Mixing Plants that are visually checked and observed on the SCADA, and pH is adjusted through addition of caustic to ensure that pH is greater than 11.5 during mixing. The mine has also developed a calculation for the quantity of caustic to be added to the leach circuit, depending on the supplied source of cyanide, to maintain pH above the required levels 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 has set an operating goal of a pH of 10.5 for the leach solution. According to the ore type, lime is added at the end of the crusher conveyor. Barren, pregnant and intermediate solutions are sampled on an hourly basis and analysed for pH and cyanide, and pH is maintained with the addition of caustic as required.

Review of the ADR Shift Log at the time of the audit showed that the pH of the barren and pregnant solutions was being maintained within the appropriate range. Tüprag also controls pH in the stripping and neutralization processes and procedures specify that pH is checked and adjusted with caustic as needed to ensure pH is 11 for these operations.

Tüprag has identified tasks and assessed the work areas where there is potential for significant exposure to cyanide. Based on the results of the assessment, fixed HCN detectors were installed in the South ADR Cyanide Storage Buildings, South Old and New Cyanide Preparation Tank areas, Acidic Washdown Area, South and North SLS Plant, SLS Storage Building, North Cyanide Storage, North Preparation Tank Area Building, Leach Pads and South and North CIC areas. In addition, HCN gas is monitored each shift at frontline locations using a portable HCN device to check for potential concerns. Records are maintained according to *HCN Measurement Instructions*. Review of records indicates that HCN readings are normally less than 1 ppm in these areas. In addition, 71 portable

HCN detectors (Pac 7000, Pac 8000, X-am-5600, X-am-5000, 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.

In addition to standard PPE requirements at the mine site, additional PPE consisting of; rubber gloves and boots, chemical overalls (Tyvek), and full-face respirators with ABEK2P3-Hg dust (3M 6099) and HCN gas filters are required when working in solid cyanide storage areas and during cyanide mix operations. The use of portable HCN detectors is also mandatory. Dust filters and Tyvek overalls are also required when handling sealed IBC cyanide boxes during delivery or transfer from the cyanide warehouse. The facility uses monitoring devices in process areas and for activities involving the management of cyanide to confirm that workers are not exposed to hydrogen cyanide gas 10 ppm on an instantaneous basis and 4.7 ppm continuously over an 8 hour period.

All Process Plant operators are fit tested and trained in the use and maintenance of full-face respirators. Respirator refresher training provided annually. Filters are required to be replaced monthly or as required. Refresher training is undertaken annually by the related departments. All emergency responders are trained in the use of self-contained breathing apparatus.

Fixed gas measurement devices are installed in work areas. Contractors and suppliers are provided with respirators and are fit tested prior to being permitted to enter areas where cyanide is present. Entry to areas such as cyanide storage preparation areas is permitted only after inspections are completed. Unauthorized persons are prohibited from entering these areas. Personal protective equipment is provided to subcontractors/material service providers, if necessary, who will perform work other than those on site. Workers were observed to be clean shaven and equipped with respirators and portable HCN detectors in the workplace.

Section 6.4 of the CMP describes actions to be undertaken in the event of an HCN release. Alarm triggers above 4.7 ppm requiring that designated employees put on a filtered full face respirator and identify the reason for the release and remedy the issue. Where hydrogen cyanide levels exceed 10 ppm, unprotected persons are evacuated to safe locations where HCN levels are below 4.7 ppm. Emergency response team members will then enter the affected area using self-contained breathing apparatus and chemical suites to identify the cause of the release and take necessary corrective actions. Affected areas are blocked off to prevent unauthorized access. Emergency instructions on actions to be taken in the event of an alarm being triggered are prominently posted at locations around the ADR Plants, SLS Plant, and Cyanide Storage Warehouses.

Twenty-nine emergency escape devices comprising filtered masks (PARAT® masks) rated to be protective up to 2,500 ppm HCN within 15 minutes have been placed within the ADR Plants 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 recording monthly inspections.

Hydrogen cyanide monitoring equipment is maintained, tested and calibrated as directed by the manufacturer, and records are retained.

Dräger (Dräger Safety Korunma Teknolojileri A.Ş., Ankara, Turkey) is contracted to calibrate the fixed and portable detectors on site. The fixed detectors are calibrated semi-

annually, and records are available for the past three years. There are a total of 35 fixed and 71 portable detectors at the mine site. Calibration of the detectors is tracked on an Excel® spreadsheet maintained by the HSS Department. Review of the spreadsheet indicated that calibration of all equipment is current. The calibration frequency for the portable detectors fully meets the frequency directed by the equipment manufacturer (Dräger). A visual check is carried out at each shift by operators. Calibration records for each monitor are stored on HSS department and were available for review. Missing/unfound devices are noted on the tracking sheet, information is provided via e-mail, and a record is created in the INX system. Any observations deemed as non-conformities are recorded in the INX system with corrective actions tracked to completion.

Warning signs are located at all of the hotspot areas, (SLS Offloading Area, Cyanide Storage Areas, Curing Area, CIC Areas inside the ADRs, and the Heap Leach-South and North) advising workers that cyanide is present, of any necessary personal protective equipment that must be worn, and that smoking, open flames, eating and drinking are not allowed.

Tüprag has procedures in place to add Carmoisine at the ADR mix plants and at the SLS mixing plant as required. 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 is used at the ADR mixing plants *, Instructions for Preparing and Using Water Color Solution With Carmoisine Powder*) and at the SLS mixing plants *Cyanide Preparation with SLS System*).

For mixing of the solid cyanide briquettes a set quantity of dye is manually added to the preparation tank (using a stick apparatus to avoid workers bending into the dump chute) and mixed with the recirculation pump. For SLS form cyanide the dye is premixed in a solution tank prior to being added to the SLS tank.

Shower and eye-wash units are located in strategic areas of the process plant where there is a potential for exposure to cyanide. Mobile showers are also located on the heap leaches where the curing operations are being undertaken. There are a total of 25 stations located (16 stations in the South and 9 stations in North Leach Areas). These stations are plumbed into the fresh water supply system and maintained at a pressure of approximately 2 bar (30 psi); or gravity fed from an overhead supply tank that provides a safe pressure for eye wash and are refilled after every operation. Showers and eye wash stations are checked weekly for flow, condition, mechanical and visual control, and access. Showers and eyewash stations are inspected every shift for working condition and the HSS Department also conducts weekly inspections of shower/eyewash condition, water pressure, working condition of green indicator lights, eyewash seals and expiry dates and that eyewash filters are free from blockages. Observations are noted on ADR Safety Showers Control Form.

There are 1,328 fire extinguishers located strategically about the mine site, and of these 265 are located in areas containing cyanide. Fire extinguishers in the cyanide containing areas are all dry chemical extinguishers (40% Mono ammonium phosphate dry chemical powder). The fire extinguishers are inspected monthly by the departments, monthly by the HSS Department and serviced and inspected together with the fire detection systems by an outside contractor every six months. Fire extinguisher maintenance and replacement dates are recorded on Fire Extinguishers Control Form.

Unloading, storage, mixing and process tanks and piping containing cyanide are identified to alert workers of their contents, and the direction of cyanide flow in pipes is designated.

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.

The tanks and piping in the cyanide mixing area and leach area including the CIC tanks are clearly labelled with cyanide warning signs. Cyanide piping is colour-coded to identify contents, and a colour-coding key, and cyanide warning signage is also posted on the access gates at the ADRs and leach areas. Reagent cyanide piping is colour-coded purple with the flow direction clearly marked. Solution pipelines at the ADRs and leach areas were clearly labelled with name and flow direction as well as colour-coded yellow and cream, respectively, to identify their contents. The piping containing the pregnant and barren leach solutions are also clearly marked with the direction of flow. on. Induction training includes identification of the labelling and colour coding so that workers understand which tanks and pipes contain cyanide solutions.

All signage, first aid procedures, SDS and other information materials are in Turkish, the primary language of the workforce. SDS manuals containing hard copies of SDS are strategically located at the warehouse, SLS refilling-station, ADRs, and laboratory. The SDS are filed in binders and segregated by mine area for ease of reference. The short form SDS sheets are also posted in strategic areas of the plant where chemicals are used. There is also signage at the entrances to the cyanide warehouse compounds and ADRs/laboratory area that provide the procedures for first aid response to cyanide emergencies in the event of an HCN gas alarm. First aid response procedures are described in the CMP and include a description of the properties of cyanide, use of PPE and first aid response to cyanide exposure. First aid response instructions to cyanide exposure are present in all Fire and Rescue Stations. First aid response information in Turkish, the primary language of workers, is also posted at strategic areas within the ADR Plants describing the actions that are to be taken in the event of an HCN alarm being triggered. All departments maintain their own SDS forms in paper form in departmental folders which are accessible by all employees. Additionally, SDSs are located in the ADR Plants office and the Administration Building. Electronic copies of SDS are also accessible on the mine intranet. SDS sheets are available in Turkish.

Procedures are in place and being implemented to investigate and evaluate cyanide exposure incidents to determine if the operation’s programs and procedures to protect worker health and safety, and to respond to cyanide exposures, are adequate or need of revising including Reporting of the Incidents.

The procedure provides instruction and guidance to ensure that investigations (including those that involve cyanide) are completed and applies to all employees and contractors. Upon an incident or near miss, the observer is required to report to their Supervisor and/or the HSS Department and complete an Incident Investigation and Reporting Form directly into the INX electronic system. Workers or contractors who do not have access to the INX system provide the hard copy reporting form to Tüprag representatives for electronic capture. All incidents and near misses are ultimately recorded in INX. Upon capture of the

incident, a notification email is delivered to the HSS Department, the relevant Department Managers and Superintendents, including the Environment and Health and Safety Departments. A Moderator is fully responsible for the management of the incident report and conducts a root cause investigation and risk analysis to ensure that all measures are implemented to remove/minimize the risk in the workplace and prevent future occurrence. Once measures have been implemented the investigation is closed.

In the event of a hospitalization, notifications will be issued by the HSS Department to the Social Insurance Institution, Eşme or Ulubey Gendarme Station and in the event of a major injury or death to the General Directorate of Mining Affairs (Ankara, Turkey). Following the incident, an incident investigation is conducted to determine the root causes by the responsible departments (chiefs, superintendents, supervisors etc.) and to identify measures to remove or minimize risk and prevent future occurrence. These are captured in an action plan on INX and tracked through to completion. The HSS Department and Environmental Department provide guidance and extends support to the individual departments during the investigation to assist in determining the measures to be taken.

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.

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 6.3; develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

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 medical oxygen kits are available in the Plant Site (North and South). Twenty-seven medical oxygen resuscitator kits (8 units retained in storage) are available for use. The resuscitator kits are artificial manual breathing units (AMBU) using positive pressure to inflate the lungs of an unconscious person. These are located in the clinic (which is a less than five-minute drive from the ADR Plant, South and sixteen-minute drive from the ADR Plant, North) in the ambulance, at the ADR Plants Fire and Rescue Station, SLS Mixing Plants Fire and Rescue Stations, in the HAZMAT vehicle, in the metallurgical laboratory, and in the ADR New Cyanide Storage Warehouse Fire and Rescue station. The units are inspected monthly by clinic personnel and recorded on control forms which also note the expiry date of cylinders. In addition to clinic staff, all Fire and Rescue Team (FRT) members are trained to administer medical oxygen. At the time of the audit there were 63 FRT members and 333 trained first aiders and 60 trained first aiders from subcontractors 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.

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. The radios are tuned to Channel 1 to allow for emergency communication. In addition, Tüprag has two satellite phones available for emergency situations. The ECMP sets out emergency phone numbers in the event of an emergency and the use of radios as required. Radios remain readily available for all workers, although cellular phones are the preferred method of communication and cellular phone reception is available across the site. There is also an audible alarm system that can be activated in the event of an emergency. The emergency response plan includes radio protocol and call channel and emergency phone numbers in the event of an emergency.

Certain areas in the ADR Plants including the cyanide mix areas are monitored by camera which is linked to security, the Process Manager and to the HSS Manager. Additionally, emergency push buttons are located at key areas within the ADR Plants and South and

North cyanide storage warehouses, gold chamber, new cyanide storage warehouse and SLS Storage Warehouse. All emergency buttons are linked to a SCADA screen where any alarms are easily detected.

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

The oxygen units are inspected monthly by the clinic and a tag on each unit is signed by a paramedic or Occupational Physician after inspection. The 15 Cyanokits are kept in a refrigerator which is monitored for temperature and records thereof retained. The expiry date on each kit is clearly marked and all kits were all within the manufacturer's expiry date. The clinic is responsible for replacing the kits prior to expiry. A control form (Cyanokit Tracking Monthly Control Form) is retained on soft and hard copy, and it is used to track the expiry date of each kit and the monthly inspections. The clinic also maintains a supply of activated carbon tablets for oral ingestion in the event of cyanide ingestion. After each inspection the form is signed by a medical technician and the clinic Occupational Physician. The clinic also maintains a supply of activated carbon powder and liquid for oral ingestion in the event of cyanide ingestion.

First Aid Kits are present at strategic locations within buildings, vehicles and emergency response vehicles (ambulance, chemical response/HAZMAT vehicle, rescue vehicle and fire truck) 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. 27 medical oxygen resuscitator kits (8 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.

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

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. The necessary response to cyanide exposure through ingestion, inhalation and absorption through the skin and eyes are defined in the ECMP and the CMP. The cyanide exposure first aid procedures are maintained at various location where cyanide is present.

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 medical technicians who provide 24-hour medical support. The paramedics receive cyanide awareness training and instruction from the Occupational Physician on the application of medical oxygen and intravenous use of Cyanokits. The Occupational Physician and medical technicians participate in emergency mock drills.

The mine has emergency response vehicles including an ambulance, fire truck, HAZMAT and rescue vehicles which can provide rapid response to emergencies and are located a few

minutes journey from the ADR Plant (South 5 min, and North 16 min). The clinic is subject to annual inspections by the Health Ministry.

Tüprag provides Occupational Physician and paramedics on a 24-hr basis at the mine site that are certified to respond to all cyanide emergencies and stabilize a patient. The mine has an all-wheel drive ambulance to follow-up through the Action Tracking Process located at the clinic in readiness for an emergency response. Tüprag has the in-house capability at the clinic to treat cyanide exposure cases, and transport to a hospital. Forty-nine ambulance drivers are from the Health Department, HSS, ADR, Environment, Operation and Laboratory, and the response time to the ADR plant in the event of an emergency is less than 5 minutes (South) and 16 minutes (North). In the event of an emergency the ambulance is allowed unimpeded access to the relevant areas of the mine as detailed in the CMP.

Tüprag has communicated with the Ministry of Health Department and Hospitals (Emergency Units) in the region of Uşak. Technical communications were made to the nearest hospitals by the Company Occupational Physician, to gather information on the 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. While Tüprag is confident that hospitals can provide intensive medical care, it is recognized through discussion with the hospitals that the expertise in the application of Cyanokits and first response to cyanide exposure resides with Tüprag's medical staff who would accompany any patient should hospitalization be required. A local ambulance service is also available in the nearest hospitals if additional ambulance capability is needed.

This ambulance is available to transport patients to government hospitals in Eşme (20 km), Ulubey (20 km), Uşak (55 km) and two private hospitals. Transport to a hospital would only be required for more intensive care outside the capability of the clinic, or for follow up monitoring.

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Principle 7 – Emergency Response

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

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The 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 drill scenarios, 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 to catastrophic as detailed below.

a) ECMP Section 4.9.2 Incident Protocol: Response to Chemicals or Hazardous Materials (Hazmat); CMP Section 6.4 HCN Emission in or Outside the Mine Site.

b) ECMP Section 4.9.8 Incident Protocol: Vehicle and Heavy Equipment Accidents; CMP Section 6.5 Fire in Locations and Vehicles Containing Cyanide; CMP Section 6.2 Cyanide Spill Outside the Mining Site.

c) CMP Section 6.1 Cyanide Spill in the Mining Site;

d) ECMP Section 4.9.1 Incident Protocol: Fire and Explosions; CMP Section 6.5 Fire in Location and Vehicles Containing Cyanide.

e) CMP Section 6.1: Cyanide Spill on the Mining Site. This includes spillages due to pipe, valve and tank ruptures;

f) ECMP Section 4.9.7 Incident Protocol: Solution Overflow from Ponds;

g) The mine has seven 1,600-kilovolt Ampere (kVA) diesel generator sets onsite dedicated to the backup operation of major pumps and other key infrastructure associated with the Leach Pads and the ADRs. If for any reason the power supply or pumps were to fail irrigation of the Leach Pads would cease with pregnant solution continuing to drain to the solution ponds. If the storage capacity of the Barren Solution Ponds were to be exceeded due to the lack of irrigation the Stormwater Ponds can be used for emergency storage of solution. There is sufficient capacity within the Stormwater Ponds to accommodate all of the solution from the Leach Pads. This is detailed in the Site Water Management Plan.

h) An uncontrolled seepage scenario is more applicable to a tailings storage facility, which the mine does not have as it operates a heap leach system of extraction. However, the CMP contains Section 6.7 Cyanide Solution Leak from Heap Leach and Ponds.

i) The site has the facility to treat solutions within the ponds with hydrogen peroxide. This is designed to be an emergency response to excessive precipitation such that there is the possibility of overflow from the ponds into the environment. This is detailed in CMP Section 6.7 Cyanide Solution Overflow from Ponds. This treatment facility is not part of the normal operation of the mine and has not been used to date. Given the significant additional storage capacity that has been added to the site it is unlikely that this treatment system will be required under current foreseeable conditions and therefore the failure of this system is not a credible potential cyanide failure scenario appropriate for the site-specific environmental and operating circumstances.

j) ECMP Section 4.9.6 Incident Protocol: Failure in Heap Leach Site; CMP Section 6.6. Slide in Heap Leach Area.

Planning for response to transportation-related emergencies has considered the transportation route, physical and chemical form of the cyanide, method of transport, the condition of the road or railway, and the design of the transport vehicle.

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 operated by To-Pet the only ICMI accredited transporter in Turkey.

An Emergency Response Plan is applied by the emergency response company (Hidra), that is specific to responding to potential transportation emergencies between İzmir Port and Kışladağ Gold Mine Site. This company 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 the appropriate actions to be taken. Any requests for assistance from Kışladağ for transport incidents outside the mine site 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 emergency response plans include specific response actions, as appropriate for the anticipated emergency situations, such as clearing site personnel and potentially affected communities from the area of exposure.

The ECMP sets out the 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 a Level 1 emergency, workers are required to notify the area supervisor or manager who takes on the role of LEO. For Level 2 and Level 3 emergencies workers are required to directly notify security and then the LEO to initiates first actions and assesses the situation. 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 CMP Section 5.10.1 Elements of Cyanide Replated Emergency Responses details the emergency response for any type of cyanide exposure including first aid and the administration of the cyanide antidote. It is noted that the antidote shall only be applied by medical personnel.

CMP Section 6.1: Cyanide Spill on the Mining Site states "stop the spill at its source if it is safe and applicable" to do so.

CMP Section 6.1: Cyanide Spill on the Mining Site also provides details of the activities necessary to contain any spill. This procedure also provides details of how a spill is assessed and the activities required to mitigate any impacts including the prohibition of using chemical to treat spills in surface water. In addition to the measures described in the CMP there a number of physical containment measure on site to prevent any spill being released into the environment. Future prevention of releases is assessed as part of the incident.

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

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

Summarise the basis for the findings/deficiencies identified.

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

The operation has involved its workforce in the cyanide emergency response planning process.

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, which included discussions about the emergency response planning process. In addition to these casual discussions with their supervisors, there are several formal approaches for workers to communicate and provide input into the development of the cyanide emergency response planning process. These include the following.

- Monthly Worker Health and Safety Committee Meetings. These are a statutory requirement in Turkey. These meetings are attended by representatives from the union, employees, the safety department, and management. The forum provides an opportunity for worker representatives to present and discuss suggestions/ recommendations regarding the cyanide emergency response planning process with management.

- Worker Representatives Meetings: These meetings are attended by representatives from each department. The meetings provides an opportunity for clear communication between workers and department heads as a bilateral communication. The minutes of meeting forms are prepared by asking for comments, requests, complaints, suggestions etc. from worker representatives.

- Weekly Toolbox Meetings: Workers have an opportunity to provide input during toolbox meetings. These meetings are held between workers and shift supervisors and provide a venue to discuss safety concerns and opportunities for improvement including emergency response planning process.
- Courageous Safety Leadership Program, is designed to build a strong safety culture by empowering employees at all levels to take personal responsibility for safety. The program encourages individuals to speak up about unsafe behaviours or

conditions, make courageous decisions even under pressure, and demonstrate visible commitment to protecting themselves and others

- The Positive Recognition Program, aims to reinforce safe behaviours and promote a culture of appreciation across the organization. The program encourages leaders and peers to actively recognize and reward individuals or teams who demonstrate outstanding safety practices, proactive hazard reporting, and a commitment to continuous improvement.

Communities are also included in the cyanide emergency response planning process through the meetings detailed below.

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

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.

The mine 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.

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 medical technicians who provide 24-hour medical support. The paramedics receive cyanide awareness training and instruction from the Occupational Physician on the application of medical oxygen and intravenous use of Cyanokits. The Occupational Physician and medical technicians participate in emergency mock drills.

Tüprag has communicated with the Ministry of Health Department and Hospitals (Emergency Units) in the region of Uşak. Technical communications were made to the nearest hospitals by the Company Occupational Physician, to gather information on the 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. While Tüprag is confident that hospitals can provide intensive medical care, it is recognized through discussion with the hospitals that the expertise in the application of Cyanokits and first response to cyanide exposure resides with Tüprag's medical staff who would accompany any patient should hospitalization be required. A local ambulance

service is also available in the nearest hospitals if additional ambulance capability is needed.

Tüprag's External Affairs (EA) Department is responsible for engaging with governmental offices and local people, affected by the mine's activities including feedback on the Emergency Response Plan in order to keep it current.

Review of records and discussions with the EA Manager and five departmental staff and review of records indicates that Tüprag has been actively consulting with the regional community since the last ICMC recertification audit. The weekly meetings have been coordinated by the EA Manager with community elders and representatives from nearby communities in the local villages of; Ulubey, Eşme, Gümüşkol, Söğütlü, Katrancilar, Bekişli, Emirli, Karacaömerli, and Küçükilyaslı located within 5 to 10 kilometres of the mine. These meetings provide an opportunity for external stakeholders (governmental and private) and members of the public to verbally communicate and ask questions or relay any concerns related to the use of cyanide and its management at the mine site. Many local and national-level stakeholder meetings have been conducted with governmental-municipal officials, security and health organizations, police, gendarme, hospitals, and specific communities. Attendance sheets reviewed indicate participation by local officials and citizens.

The EA Department meets with interested local stakeholders at least twice a year to provide updates on cyanide-related activities (Stakeholder Engagement Plan). In addition to the planned meetings, there are a large number of unplanned meetings.

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The Emergency Response Plans includes cyanide related elements as detailed below.

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

The roles and responsibilities of emergency response personnel are detailed in the ECMP in Section 4.1 for Level 2 Emergencies and in Section 5.3 for Level 3 Emergencies. Including primary and alternate emergency response coordinators.

The Cyanide Emergency Scenarios in the CMP detail the responsibilities for the various scenarios.

The Emergency Coordinator “will provide coordination in the issues of assessment of emergency with Emergency Control Group members, enabling and ensuring the actualisation of suitable response methods and effective and safe finalisation of emergencies by providing resources when necessary”.

b) Identify Emergency Response Teams.

The people that form part of the Emergency Control Group for Level 2 Emergencies and part of the Crisis Management Group for Level 3 Emergencies are detailed in the ECMP.

Volunteer Fire and Rescue Team Members consisting of employees from various departments, who are qualified in, and trained on, prevention, protection, evacuation, firefighting, first aid and similar issues, were selected within the framework of Tüprag Kışladağ Gold Mine Emergency Management Plan. The members of the FRT are listed on noticeboards around the mine with their pictures and contact information. This was observed by the auditors during the site inspection.

c) Require appropriate training for emergency responders.

The ECMP includes “Members of Fire and Rescue Team are required to take the following training” This include the following; HAZMAT, Emergencies and Risks, Fire and Rescue Team Selection Criteria, Fire and Explosion, Training on the use of the Fire Truck, Introduction and Use of Rescue Vehicles and Resue Equipment, Response to Cyanide Emergencies, Use of Breathing Apparatus, Use of Oxygen, Rescue in

Indoor Areas, Vehicle Extrication, Confine Space Rescue, Responsibilities of ECMP and Fire Rescue Teams, and First Aider Certificate.

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

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 ECMP includes Section 4.3 Emergency Reporting that includes the callout procedure. It also includes the contact numbers for Security, Emergency Coordinators, Health Unit and Environmental Unit. Table 2 includes the contact numbers for the Emergency control Group and Table 1 the contact information for the Fire Rescue Team Leaders.

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

The roles and responsibilities of coordinators and emergency response personnel are defined in Sectio 4.1 and Section 5.3 of the ECMP for Level 2 and Level 3 Emergencies, respectively as designated by Tüprag.

f) List emergency response equipment, including personal protection gear, available on-site?

Section 4.10 Emergency Equipment Lists on the ECMP details all of the emergency equipment available on site including the various emergency response vehicles (fire truck, rescue vehicle, HAZMAT vehicle) and mobile equipment list. The Ambulance has a list of the emergency response equipment it includes.

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

The emergency response equipment is inspected monthly by the HSS Department using the Crisis Management Centre Equipment Checklist. The equipment in the Ambulance is inspected prior to each shift using the checklist within the ambulance.

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

Section 5.5 Comparison of Emergency and Crisis of the ECMP states that “in cases where operating facilities may be insufficient, help may be sought from external sources such as law enforcement (Police, Gendarmerie, Fire Brigade and/or Emergency Services such as AFAD, UMKE, etc.)”. In addition, “If the Emergency situation leads to a CRISIS, the State’s response teams may also be involved in responding to the situation and may have a say and responsibility in managing the crisis.”

The Emergency Coordinator will notify the surrounding community(s) that may be affected by the emergency. The exact requirements will depend on the nature of the emergency.

The on-site clinic will be responsible in the first instance for the treatment of any personnel needing treatment however, if there are multiple injured people the Uşak State Hospital will be informed.

The ECMP states that the following will need to be followed up on a daily basis within the crisis area including, ensuring the health and safety of employees, contractors, and the surrounding community. In addition, ensuring that employees, contractors and the surrounding community are informed about the developments.

Tüprag's External Affairs (EA) Department is responsible for engaging with governmental offices and local people with regards to their involvement in a response to an emergency that extends beyond the boundaries of the mine.

Review of records and discussions with the EA Manager and five departmental staff and review of records indicates that Tüprag has been actively consulting with the regional community since the last ICMC recertification audit in 2022. The weekly meetings have been coordinated by the EA Manager with community elders and representatives from nearby communities in the local villages of; Ulubey, Eşme, Gümüşkol, Söğütlü, Katrancilar, Bekişli, Emirli, Karacaömerli, and Küçükilyaslı located within 5 to 10 kilometres of the mine.

These meetings provide an opportunity for external stakeholders (governmental and private) and members of the public to verbally communicate and ask questions or relay any concerns related to the use of cyanide and its management at the mine site in addition to communicating details of the Emergency Response Plans and the actions required in the event of an emergency.

Many local and national-level stakeholder meetings have been conducted with governmental-municipal officials, security and health organizations, police, gendarme, hospitals, and specific communities. Attendance sheets reviewed indicate participation by local officials and citizens. These meetings provide the opportunity to communicate the roles and responsibilities in the event of an emergency that extends beyond the boundaries of the mine.

The EA Department meets with interested local stakeholders at least twice a year to provide updates on cyanide-related activities (Stakeholder Engagement Plan). In addition to the planned meetings, there are a large number of unplanned meetings.

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 going beyond the boundaries of the mine potentially including a cyanide release.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 7.4**

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

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

The ECMP Sections 4 and 5 provide details for notifying regulatory agencies, external response providers and medical facilities for Level 2 and Level 3 Emergencies respectively. Form F3 provides the Kışladağ Crisis Contact Details for the various relevant internal personnel, including the FRT and Mine Clinic, while telephone numbers are also provided for Government Agencies, and the Press.

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 Provincial 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 Plan includes procedures and contact information for notifying potentially affected communities of the cyanide related incident and any necessary response measures and for communication with the media.

The CMP states “The potentially affected communities shall be informed about the cyanide and associated risks through meetings held with local leaders and public authorities, and shall be advised about communication and response actions during emergencies. Depending on the nature of emergency and scenarios of impact, direct contact shall be established with the communities who might be affected from the incident, as well as their leaders or representatives”.

The ECMP Section 5.8.4 provides details of the Communication Coordinator/ Spokesperson’s responsibilities during an emergency including; to assist in developing communication plans, to observe the media, and to contact the Tuprag Communication Coordinator before answering any media questions.

The ECMP Section 5.10.4.3 Public and Media Relations provides details of the information that can be provided to the Press.

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

Section 5.10.2 Cyanide Emergencies of the CMP includes “Reporting Serious Cyanide Incidents to the International Cyanide Management Institute (ICMI)”. The procedure states that the ICMI must be notified by email, fax, or phone within 24 hours from the date the incident occurs. This is for any incident during transportation, storage, use, operation, or disposal, where there could be the potential for serious harm to employees, local communities or the environment as defined in the ICMC.

There have been no significant cyanide incidents to date that would require the ICMI to be informed.

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The emergency response plans describe specific remediation measures as appropriate for the following likely cyanide release scenarios.

a) Recovery or neutralisation of solutions or solids.
b) Decontamination of soils or other contaminated media.
c) Management and/or disposal of spill clean-up debris.
d) Provision of an alternate drinking water supply.

The CMP, ECMP and relevant protocols address recovery and neutralization of cyanide solution and solid cyanide spills. Calcium hypochlorite is a neutralizing agent selected for use and forms 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 at strategic points in the ADR, Cyanide and SLS storage warehouses.

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 procedures, 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. The 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 the Ministry of Environment and Urbanism, require WAD CN concentration to be less than 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 affected parties. This water would be supplied in the form of a water tanker with the water taken from the unaffected municipal supply.

Calcium hypochlorite is referred to in the CMP as the chemical that is to be used for the neutralization of cyanide spills. This is also the chemical that is stored on site for this purpose. CMP clearly states “In the event of cyanide mixing with surface water, never add Calcium/Potassium Hypochlorite or Ferrous Sulfate to the water. Both of these chemicals are toxic to aquatic life”.

Tüprag continues to maintain a hydrogen peroxide dosing system at storm water pond SWP-1 and will only be used to neutralize cyanide contaminated water prior to it being discharged to the environment due to an extreme storm event that exceeds the storage capacity of the storm water ponds. With the addition of the latest event ponds, PRP5 with a capacity of 448,986 m^3 for the South Heap Leach, and SWP-2 with a capacity of 299,442 m^3 for the North Heap Leach it is unlikely that the storage capacity will be exceeded. To date a discharge to the environment has not been required.

It is noted in Section 5.10.1 Elements of Cyanide Related Emergency Responses of the CMP that hydrogen peroxide is harmful to aquatic life. In the event of hydrogen peroxide being used prior to a discharge to the environment this process is managed using the Directing the Solution to Disaster Pools and Heap Leaching and Applying Hydrogen Peroxide to the Solution in Case of Excessive Precipitation procedure.

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. However, this has not happened to date.

Tüprag has arrangements with university laboratories in Turkey, if required. Tüprag also has a contract with ALS (Canada), Dokuz Eylul University Environment Department Laboratory (Turkey), Çevre Analiz Laboratory (Turkey) as Accredited Environmental Laboratories, governmental and private laboratories from Turkey accredited by TURKAK and Ministry of Environment and Urbanization for the analysis of the samples. The auditors observed the current map showing the surface water and groundwater locations used for regular monitoring.

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

The operation is

☒ **in full compliance with**

☐ **in substantial compliance with Standard of Practice 7.6**

☐ **not in compliance with**

Summarise the basis for the findings/deficiencies identified.

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

The operation reviews and evaluates the cyanide related elements of its Emergency Response Plans for adequacy on a regular basis.

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 (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.

Mock cyanide emergency drills are conducted periodically.

The ECMP and CMP require that drills are conducted to test the understanding and readiness of the ECG, KCMG, and Fire Rescue Team. Emergency drills are conducted throughout the year that consider both environmental releases and worker exposures simulating release scenarios appropriate for the operation.

The auditors observed the drill schedule for 2025 for the mine. This includes a wide range of drills with 2 of the drills each year being cyanide related. These drills include the involvement of the mine clinic. The following mock drill reports were observed.

The FRT also conduct monthly training exercises where various emergency scenarios are tested.

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

The ECMP states that it will be updated when there is a change in; Crisis Management Team Members, operations, legislation, company requirements or following an emergency. The Plan is also reviewed annually. The Plan is currently on revision 23.

Kışladağ Gold Mine
Name of Facility

Signature of Lead Auditor

January 2026
Date

The CMP states that the Plan will be reviewed at least annually or as necessary which includes if there is an emergency or a change in the ECMP. The Plan is also reviewed annually. The Plan is on revision 16.

Each mock drill is evaluated to critique the effectiveness of the ECMP and CMP and identify any follow-up corrective actions, as needed to address any deficiencies. Responsible persons are allocated the relevant corrective actions. The evaluations undertaken following the mock drills over the past three years has not identified any deficiencies that would require revisions to the ECMP or CMP. In addition, there have not been any actual emergencies where the ECMP or CMP have been implemented.

Principle 8 – Training

Train Workers and Emergency Response Personnel to Manage Cyanide in a Safe and Environmentally Protective Manner.

Standard of Practice 8.1: Train workers to understand the hazards associated with cyanide use.

The operation is

☒ **in full compliance with**

☐ **in substantial compliance with** **Standard of Practice 8.1**

☐ **not in compliance with**

Summarise the basis for the findings/deficiencies identified.

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

All departments continue to implement an intensive training program. The mine provides mandatory cyanide training for all new employees and contractors who will work in cyanide facilities. This training includes; the forms of cyanide, recognition, hazards, signage, safe handling guidelines, exposure routes, control of the generation of HCN gas, health effects of cyanide, symptoms of cyanide exposure, and first aid treatment in the event of exposure. This training adequately addresses cyanide hazards.

Visitors to the operation receive a basic induction which includes cyanide awareness and information on cyanide hazards including the CMP, ECMP, Cyanide Code, cyanide properties, exposure symptoms, hazards, usage, and safety systems and general environmental rules and environmental management system (Introductory Training/Cyanide Awareness Training). For visitors, an induction video is watched in Turkish with English subtitles, and a short exam is applied. Training records are maintained by the HSS Department and Environment Unit and on the INX system.

The HR department has a personnel check list to track trainings. Visitor trainings are kept in a file in the OHS department. After all necessary trainings are completed; employees and contractors have permission to work on site. Prior to being permitted on the mine site, all contractors and workers are required to attend induction training which includes site policies, procedures, workplace health and safety, workplace and chemical hazards, cyanide awareness, PPE, signs, colour coding meanings, alarms, emergency response plans and actions, incident reporting and safety meetings. After all necessary trainings are completed; employees are given an identification (ID) card permitting them to work under supervision in the facility.

Prior to undertaking cyanide related tasks, all workers receive further training on management systems and SOP/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. Additionally, the process department provides JSA and SOP training. New employees receive at least two hours of on-the-job training from the process department trainer, which is recorded. 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. 1,5-day induction for all workers incl. contractors, 1 day for H&S and half day for Environmental and Energy trainings). 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. New employees to the heap leach receive training by the shift supervisor for one week and are evaluated at the end of that period. A minimum evaluation score of 70% is required for lone working.

Tüprag FRT is trained on specific responses to cyanide emergency situations including symptoms of cyanide exposure, hazard recognition, responses to emergency situations and the appropriate use of PPE, spill kits and neutralizing agents. They are also equipped with the most current information and techniques through ongoing training in regular drills, effective communication and coordination skills, post-incident reporting and assessment, and updated procedures.

Annual cyanide refresher training as part of a 16-hour health and safety refresher training program (Long - Period H&S training) is required for those that work with cyanide (including ADR operators and supervisors, leach tank operators, safety officers, maintenance workers, electricians, firefighters, rescue teams and those working in cyanide areas. Of this 1 hour is cyanide awareness training with an examination (threshold 70 %). This refresher training includes cyanide awareness, risks of cyanide, cyanide handling procedures and emergency response. For those that work with cyanide (including ADR operators and supervisors, leach pad operators, security officers, maintenance workers, electricians, firefighting, and rescue teams), this refresher training is required annually.

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 by ADR department, and oxygen resuscitation kit operation, CyanoKit and CarboSorb awareness, expiry dates for medical oxygen canisters, cyanide facility inspections by HSS, working on cyanide pumps/valves/pipelines/tanks, and wet and dry sodium cyanide decontamination. This training was provided by the ADR and Maintenance departments. Cyanide management and the Cyanide Code trainings with totally 93 mock drills (man-down, eyewash and Hazmat in cyanide areas) on the mine site were also given since 2022. Cyanide awareness is included as a specific topic and covers chemical risk factors, safe use of work equipment, health and safety signage, use of PPE, health and safety rules, evacuation and rescue procedures, hazard identification and risk assessment, JSA preparation, incident and hazard reporting and housekeeping, the CMP and ICMC requirements. Task training records are retained by the related Departments and includes attendance sheets, which were observed by the auditors.

Cyanide training records are retained. All induction and refresher training records are retained by the HSS department and Environment unit tracked on INX software. Basic cyanide training is tracked by the HSS department. Based on the information reviewed, basic training and refresher training records covering the period since the previous

recertification audit have been fully maintained. Review of training records for selected operators and managers confirmed that records were available and complete.

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 8.2; Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

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. For ADR operators, procedures include the following.

- Preparation of Sodium Cyanide Solution- Case Cutting,
- Cyanide Preparation with SLS System,
- Instruction for Unloading Cyanide to Cyanide Warehouse with the use of Ramps,
- Filling the SLS Tanker with Cyanide,
- Loading of Sodium Cyanide from the Main Gatehouse to the Cyanide Storage Warehouse in the Mine Site,
- Preparation of Sodium Cyanide Solution- Case Cutting,
- SLS Preparation and Dissolution,
- Warm Stripping Solution Preparation and Warm Stripping Process,
- Carbon Safety Screens Cleaning,
- DR and Heap Leaching Shift Solution Sampling,
- Carbon columns transfer using air lift and pump systems
- SLS Tank Filling,
- ADR Plant Drainage Pit Cleaning,
- Preparation of Hot Stripping Solution and Hot Stripping Process In Northern ADR,
- Hot stripping solution tank cleaning,
- Hot stripping,
- Hot stripping solution preparation,
- Leaching site and ADR pipelines control in case of excessive rainfall,
- Cyanide Storage Tank Cleaning,
- Cyanide Preparation Tank Manhole Cover Opening,

- Clearing the blockage inside the SLS container,
- Hot Stripping Stop and New Stripping Start, and
- Use of PPE in ADR Plant.

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, nitric acid, sulphur dioxide and activated carbon and management of the cyanide application at the grasshoppers. General operation procedures include the following:

- Loading of Sodium Cyanide from the Main Gatehouse to the Cyanide Storage Warehouse at the Mine Site,
- Preparation of Sodium Cyanide Solution- Box Cutting,
- SLS, Preparation and Dissolution,
- Warm Stripping Solution Preparation and Warm Stripping Process,
- Carbon Safety Screens Cleaning,
- ADR And Heap Leaching Shift Solution Sampling,
- SLS Tank Filling
- ADR Plant Drainage Pit Cleaning,
- Preparation of Hot Stripping Solution and Hot Stripping Process in Northern ADR,
- Carbon Columns Transfer Using Air Lift and Pump Systems
- Solution Management in Extreme Rain and Procedure for Dosing Hydrogen Peroxide in Solution,
- Hot Stripping Solution Tank Cleaning,
- Hot Stripping,
- Hot Stripping Solution Preparation,
- Leaching Site and ADR Pipelines Control in Case of Excessive Rainfall,
- Cyanide Storage Tank Cleaning,
- Cyanide Preparation Tank Manhole Cover Opening,
- Clearing the blockage inside the SLS container,
- Hot Stripping Stop and New Stripping Start,
- Use of PPE in ADR Plant,
- 4"-10", Disassembly and Assembly of Pipes,
- Drawing Drip Pipes to Leach Cell Slopes,
- Opening and Flashing the Ends of Drip Pipes,
- Heap Leaching Curing,
- Intervention to Small Material Runoff and Solution Ponding at Leachpad Site,
- Test Pad-Sampling,
- Pressure Clock Change,
- Control of Heap Leach pad and ADR Pipelines in Case of Excessive Rainfall,
- Netting of Return Ponds Netting, Net Correction and Pond Cleaning,
- Piping Team Heap Leach Pad Site Control,
- Filtering Carbon and Sludge in Feed Solution Through Drainage Valve,

- Mobile Conveyor Ordinary Receiving and Conveying Works,
- Chute Cleaning with Telehandler and Compressor,
- Heap Leaching Curing, and
- Stacking with Radial Stacker.

The training program requirements 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. Additional training in cyanide management procedures applicable to specific work assignments is provided to the workforce by the shift supervisor. All staff receive 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.

Tüprag has 8 policies (Health and Safety Policy, Environmental Policy, Social Performance Policy, Human Rights Policy, Respectful Workplace Policy, Energy Management Policy, Supplier Code of Conduct Policy), 4 handbooks, 497 procedures and 486 work instructions for mine operations. A training matrix is used to track those cyanide related requirements which include: Cyanide Management Plan, routine operation procedures, and instructions. Tüprag has JSA work instructions for mine operations. A training matrix is used to track cyanide related requirements and there are 15 JSA, 19 SOP and 1 Procedure. There are Standard Operational Procedures for routine works for all mine operations and there are also JSA forms just for nonroutine operations/works. Routine and nonroutine procedures specific to the ADR plant and Heap Leach Operation. 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. The training matrix is retained on the INX system. All workers receive annual cyanide awareness refresher training, emergency response training and additional training in cyanide risk and management for specific work tasks to manage risks as required. The heap leach pipe irrigation crew receive training on SOPs/JSAs, pipe installation and maintenance specific tasks that is based on an annual schedule.

Tüprag's health and safety training program is managed by the HSS Department and requires that health and safety training requirements are set at the end of each year to next year as required by government regulation.

Tüprag continues to maintain a detailed training program for normal production tasks, including unloading, mixing, production, and maintenance, with minimum risk to worker health and safety in a manner that prevents unplanned cyanide releases. All workers that undertake cyanide related tasks are required to complete cyanide awareness training as well as task specific training.

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, Major Industrial Accidents, SDSs, Emergency Procedures, PPE Training, Health Training, Fire Training which is updated annually.

It is a legal requirement that all Plant operators must also receive “Occupational Certification” before being permitted to work. Certification is gained through a 180 hours and 40 hours practice training program provided by an authorized training company and monitoring by the HR department. The program provides a general understanding of safety legislation. Prior to conducting operational tasks without direct supervision, workers must receive site-specific training in safe work instructions. Certificates for a number of plant operators were observed by the auditors.

Task training related to cyanide management activities is provided by an appropriately qualified person. Employee task training is undertaken by supervisors and senior operators/employees and trainers 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. Cyanide awareness training is provided by the supervisor/trainer who has experienced of cyanide process including completion of Technical Trainer Training, and Work Safety Leadership Training. The Safety Task Observation Program is applied to employees to ensure that tasks are performed safely and in accordance with training content.

Health and safety training is undertaken by the HSS Department is provided by professionals who are government certified with each trainer required to sit an exam to be qualified. Trainers are certified by experience into classes A, B and C. The FRT is trained by a certified health and safety expert from within the HSS Department with experienced in health and safety.

The first aid trainers have lifetime first aid certificates issued by the governmental health service and have completed the governmental train the trainer courses. The Emergency Response Coordinator who provides training to FRT Members, is professionally trained, and has over 15 years’ experience as a Health and Safety Professional.

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 Job Safety Analysis, Induction, Environmental Awareness, Long - Period H&S training, Physical and Chemical Risk Factors, PPE Training, Health Training, Fire Training. This training is provided by safety department trainers under the guidance of the Health and Safety Specialist. All employees that may encounter cyanide in the workplace have been trained in cyanide hazard recognition and refresher training has been provided annually. During basic cyanide training, trainees are required to undertake and pass an examination (minimum exam score is 70 points).

Refresher training on cyanide management is provided to ensure that employees continue to perform their jobs in a safe and environmentally protective manner. As discussed in 8.1(2), H&S refresher training is mandatory for all workers, including subcontractors, on an annual basis and comprises a minimum of 16 hours training including 1 hour of cyanide awareness topics. The Health and Safety Department allocates three days a week (Tuesday, Wednesday and Thursday) to conduct training sessions and is normally started in April of each year. Topics include chemical risk factors, cyanide awareness safe use of work equipment, safety and health signs, use of PPE, health and safety rules, evacuation and rescue, hazard identification and risk assessment, JSA preparation, incident and hazard reporting and housekeeping. Cyanide refresher training (including cyanide awareness, risks of cyanide, cyanide handling, current preventative measures, and emergency response) is required by all workers on an annual basis. Total cyanide refresher training is 1 hour. The refresher training that Process and ADR operators receive is more extensive and on a different time scale than the refresher training other employees receive. Cyanide awareness is included as a specific topic and includes hazard signage, safe working with cyanide, the CMP and ICMC requirements. Additional training sessions are organized by the HSS department for the employees who could not participate due to their leaves or absenteeism.

At the time of the field component of the audit, Tüprag was conducting annual OHS refresher training, and an individual's training records was reviewed on INX to confirm this. The training matrix defines the task training required for each job role and is used to track the required training of each worker on an annual basis.

The operation evaluates the effectiveness of cyanide training by testing and observation. Records reviewed by the auditors and discussions with training personnel indicate that worker understanding of basic cyanide hazard recognition and spill response training is evaluated via written examinations. The examination format is robust, requiring substantial explanation of key points as a demonstration of the trainee's knowledge. Cyanide induction and refresher training is evaluated through examination using a multiple-choice test paper. The pass mark is 70% and additional instruction and examination is required for trainees that do not make the grade.

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. The trial period is 2 months according to the Labor Law and can extend up to 4 months in cases where there are collective labor agreements. This is followed by up to a 4-month probationary period during which the employee is observed by the shift supervisor and process engineers. When deemed proficient by the supervisor the employee is evaluated by the Process Operation Superintendent over one shift and if satisfied the Superintendent approves a completion of training form which is filed by the HR department.

Each department is required to conduct 12 task observations per annum to evaluate operator safety: including performance of operator activities, operator behaviour, and management of task related risks. The employee's name and employee number, task observed, date of observation, comments and any corrective actions are recorded into a Safety Task Observation Form and entered into the INX software.

Records are retained throughout an individual's employment documenting the training they have received and including the names of the employee and the training topic(s), trainers name and signature, date of training, and sign-off by each attendee, the topics covered, and how the employee demonstrated an understanding of the training materials. 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 operational task training. Hard copies of training records are kept by the related departments and also are entered training records into INX system. These operational task trainings are given by department trainer. Only health and safety Induction and refreshment training are given by Health and Safety department, and records are kept by HSS Department. Copies of training records are entered into INX, since its implementation in 2022, and may be searched and retrieved through this system.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 8.3**

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 8.3; train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

All cyanide unloading, mixing, production and maintenance personnel are trained in the procedures to be followed if cyanide is released, including decontamination and first aid procedures. All employees that work with cyanide complete induction and refresher training in cyanide awareness. Employees undertaking cyanide specific tasks receive task specific training on standard operating procedures for that task as well as procedures to follow in the event of a cyanide exposure. The induction materials include description of solid and gaseous cyanide, safe handling guidelines, exposure routes, symptoms of cyanide poisoning, incident management, emergency call out procedures and first aid treatment including administering oxygen and decontamination steps. Refresher training includes CMP and ICMC requirements, including emergency response, hazard awareness, risk minimization, spill response, and cyanide first aid.

Operators are issued with radios and are trained to contact security and their supervisors via the emergency call channel in case of an emergency (Radia Channel-1). 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. The FRT is trained in responding to chemical releases including cyanide. The FRT team members receive the same training as above and conduct 4 mock emergency drills per annum.

Refresher training includes CMP and ICMC requirements, including emergency response, hazard awareness, risk minimization, spill response, cyanide first aid and emergency scenarios. The FRT members are trained in responding to chemical releases including cyanide. The team members receive the same training as above and conduct at least 4 cyanide spillage and man down drill per year.

Emergency Response Coordinators and members of the FRT are trained in the procedures included in the ECMP regarding cyanide, including the use of necessary response equipment.

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. 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). Two or three of the total 60 FRTs are also process operators and would therefore be at hand to provide immediate first aid assistance. An Occupational Physician, 5 emergency medical technicians are on duty (24 hours/7 days a week) at the clinic, located just a 5 minutes' drive from the ADR and Leach area. Hydroxocobalamin, if needed, can only be administered by a doctor or paramedic. Emergency response procedures have been developed that address emergencies associated with specific areas/operations.

The FRT, like all employees, also receive annual cyanide, first aid training from the clinic doctor. The FRT conduct monthly emergency response training exercises. Since 2022, 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 ECMP also requires that desk-based simulations are carried out annually to test the readiness of the ECG, Kışladağ Crisis Management Group (KCMG) and FRT to respond to emergencies including cyanide release scenarios. Crisis simulations are conducted annually by the Crisis Management Team using at least one scenario.

Review of records and discussions with the EA Manager and five departmental staff and review of records indicates that Tüprag has been actively consulting with the regional community since the last ICMC recertification audit in 2022.

These meetings provide an opportunity to communicate to external stakeholders (governmental and private) details of the Emergency Response Plans and the actions required in the event of an emergency.

Many local and national level stakeholder meetings have been conducted with governmental-municipal officials, security and health organizations, police, gendarme, hospitals, and specific communities. Attendance sheets reviewed indicate participation by local officials and citizens. These meetings provide the opportunity to communicate the roles and responsibilities in the event of an emergency that extends beyond the boundaries of the mine.

The EA Department meets with interested local stakeholders at least twice a year to provide updates on cyanide-related activities (Stakeholder Engagement Plan (KGM-PR-006-MP-t)). In addition to the planned meetings, there are a large number of unplanned meetings.

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 going beyond the boundaries of the mine potentially including a cyanide release.

Emergency Response Coordinators and members of the FRT are trained in the procedures included in the ECMP regarding cyanide, including the use of necessary response equipment.

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. 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). Two or three of the total 60 FRTs are also process operators and would therefore be at hand to provide immediate first aid assistance. An Occupational Physician, 5 emergency medical technicians are on duty (24 hours/7 days a week) at the clinic, located just a 5 minutes' drive from the ADR and Leach area. Hydroxocobalamin, if needed, can only be administered by a doctor or paramedic. Emergency response procedures have been developed that address emergencies associated with specific areas/operations.

Records are retained documenting the cyanide emergency response training, including the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials. 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, 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 HSS Departments. This training includes recognition of cyanide exposure symptoms, decontamination and first aid. In addition, the FRT participates in the emergency training sessions which periodically include hazardous materials training including cyanide, and mock drills that involve cyanide emergency scenarios. Also, 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 emergency medical technicians 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.

Principle 9 – Dialogue and Disclosure

Engage in Public Consultation and Disclosure.

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

Tüprag continues to maintain a transparent community outreach program and proactive Stakeholder engagement program aligned with international standards such as the ICMC and The Mining Association of Canada's Towards Sustainable Mining (TSM). The company regularly engages with local authorities, NGOs, media, and the public through its External Affairs Department as detailed in the following procedures.

- Stakeholder Engagement Plan-v.5.
- Social Impact Procedure-v.3.
- Community Development Plan-v.4.
- Grievance Management Procedure-v.6.
- Public Relations procedure-v.12.
- Human Rights Guide-v.2.
- Local Purchasing Procedure-v.1.
- Emergency and Crisis Management Plan-v.23.

The TSM standard is a globally recognized sustainability program that supports mining companies in managing key environmental and social risks with 9 critical aspects and 34 distinct performance indicators. 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 the 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. The Indigenous and Community Relationships Protocol contains five performance indicators:

1. Community of Interest (COI) Identification

2. Effective COI Engagement and Dialogue

3. Effective Indigenous Engagement and Dialogue

4. Community Impact and Benefit Management

5. COI Response Mechanism

Tüprag manages water and biodiversity activity in conformance with Level A of the TSM Water Stewardship Protocol and Biodiversity Conservation Management Protocol and Indigenous and Community Relationships Protocol, Climate Change Protocol, Safety and Health 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 the mine's privilege to operate.

The Sustainability Integrated Management System (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. Eldorado Gold developed the SIMS (version 3, January 2025) as a management system that includes the followings:

• General Standards (GS) incl. ICMC verification,

• Occupational Health and Safety (OHS),

• Environmental Performance (EP),

• Social Performance (SP)

• Security Standards (SS)

Tüprag continues to maintain its general policy as responsive and communicative with the public as possible in relation to mining operations and the use of cyanide and engage with stakeholders similar to that noted in the 2022 ICMC recertification audit.

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 and an information booklet (Kışladağ Gold Mine, Sustainability Brochure for Visitors) which includes information on cyanide management and actions to be taken in the event of an emergency. A mine visit evaluation form is provided for completion by visitors to solicit feedback and comments. Representative offices are maintained in; Izmir,

Ankara, and Uşak to liaise with appropriate authorities during which concerns may also be raised.

Tüprag's External Affairs (EA) Department is responsible for engaging with governmental offices and local people, affected by the mine's activities. Review of records and discussions with the EA Manager and five departmental staff and review of records indicates that Tüprag has been actively consulting with the regional community since the last ICMC recertification audit in 2022. The weekly meetings have been coordinated by the EA Manager with community elders and representatives from nearby communities in the local villages of; Ulubey, Eşme, Gümüşkol, Söğütlü, Katrancilar, Bekişli, Emirli, Karacaömerli, and Küçükilyaslı located within 5 to 10 kilometres of the mine. These meetings provide an opportunity for external stakeholders (governmental and private) and members of the public to verbally communicate and ask questions or relay any concerns related to the use of cyanide and its management at the mine site. Many local and national-level stakeholder meetings have been conducted with governmental-municipal officials, security and health organizations, police, gendarme, hospitals, and specific communities. Attendance sheets reviewed indicate participation by local officials and citizens. The EA Department meets with interested local stakeholders at least twice a year to provide updates on cyanide-related activities (Stakeholder Engagement Plan). In addition to the planned meetings, there are a large number of unplanned meetings (village visits and visits of the villagers to the mines) were also held (426 meetings with 818 people in 2022, 343 meetings with 583 people in 2023, 336 meetings with 552 people in 2024, 216 meetings with 386 people by July 2025).

Tüprag, on an annual basis, organizes and conducts dozens of site tours for external stakeholders including NGOs and members of the public. These are critiqued by visitors on form: , Site Visit Evaluation Form. Since 2022, a total of 2,488 people (454 in 2022, 408 in 2023, 442 in 2024, 1,184 by July 2025) have visited the site. Site visits average 622 individuals per year from 2022 and others. 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. Over 1,500 visitors have toured the site since 2022 including public stakeholders and NGOs, all receiving cyanide safety information and the mine also launched a program focused on Fatigue Management. As part of ongoing initiatives, the mine has organized Employee Family Days, during which family members are invited to visit the mine site and observe the working environment. During these visits, the mine also provides information about key operational topics, including the ADR process, cyanide management, water usage, and dust control. Tüprag organizes semi-annual community meetings in open-forum formats that permit participants to ask questions or voice concerns regarding the management of cyanide. These meetings are fully recorded by the EA staff. Additionally, reports and records of communication meetings, attendance lists are reviewed, and all employees are made aware of cyanide and related issues including the Cyanide Code.

Complaints received from outside parties are fully documented on a Public Inquiry Form - Grievance Form , as stated in the Tüprag Stakeholder Engagement Plan and Grievance Management Procedure - Grievance and Feedback Procedure . Any such complaints, requests or proposals received from communities of interest or local people are examined by the EA 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 desired and submitted to the complaint boxes, which are opened every Friday under the supervision of Tüprag security. All complaints containing a complaint form are recorded on a complaint registration form, which is submitted to the EA Manager for action. The inquiry or complaint is then forwarded to the General Manager or other units, depending on the nature of the complaint. The issue is entered into Eldorado Gold's global databases of the HSSE System and Metrio System, and the response and all actions are tracked until completion. Information recorded in the database includes a unique ID for each issue, the date of the complaint, the name of the complainant, the community involved, a description of the complaint, the status of the investigations, the person responsible for the actions, the planned completion date, and the resolution date. Complaint boxes are located in the villages of Gümüşkol and Bekişli.

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. A review of grievance records identified that Tüprag received totally 26 complaints (33 in 2022, 1 in 2023, 1 in 2024, and 1 by the end of July 2025) during last 3 years related to issues around; dust air quality, noise, vibration, security, safety, physical disturbance, damage, contractors, supply management, road safety. Cyanide has not been raised as an issue.

In accordance with the TSM Aboriginal and Community Outreach Protocol, Tüprag hosts Community Interest Group meetings every six months, normally in May and November, and shares information about mining operations, including cyanide management with external stakeholders such as village headmen, union representatives, and supplier representatives. At these meetings various topics related to mine operations may be discussed including cyanide releases. Feedback is solicited and recorded on meeting minutes and on the Form of Feedback from Public

Periodically annual meetings are held with provincial representatives including; the District Governor, Mayor, District Agriculture Director, Gendarme Commander, Police Chief, village leaders, NGO's, District Health Director and representatives of surrounding local hospitals. These representatives are invited to attend a meeting at the mine; however, if this is not possible the EA Department will attempt to arrange a meeting offsite at the representative's location. Regular dialogue is also maintained throughout the year with hospitals by the mine Doctor and the EA 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 EA Team.

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

Tüprag has developed several written and electronic materials (flyers, leaflets, brochures, etc.) for stakeholder groups, local communities, and meeting purposes in Turkish and English. These describe; the use of cyanide in mining, its effects health and the environment, the Cyanide Code and the management of cyanide during production, transportation, and operations. The presentation materials, both audiovisual and written, are freely distributed at public meetings and upon request. 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 made available 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 maintains a corporate website that contains 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. Tüprag is also a signatory to the United Nations Global Compact and is carried out in accordance with ISO 45001:2018, ISO14001:2015, ISO 9001:2015; the international OHS standards approved by independent auditors.

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. Regular mine tours are arranged throughout each year during which cyanide awareness and management information is provided in the form of booklets and presentations. There have been zero grievances from communities and other stakeholders regarding cyanide management as registered in the complaint

management system and indicated in the Grievance Procedure. Communities, are also engaged in mock drill scenarios to provide them with awareness on the actions to be taken in the event of a cyanide emergency. During these engagements, discussions are also held around topics of cyanide management within plant operations. The Mock Drills are performed with the transportation HAZMAT Response Service Company and Uşak Metropolitan Municipality Fire Department. The Mock Drill findings and emergency management of the transportation hazards are discussed, and these discussions include review of community awareness.

The Eldorado Gold corporate (https://www.eldoradogold.com) and Tuprag (https://www.tuprag.com.tr/kisladag-altin-madeni/#) webpages contain 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 Department. Newsletters is also published periodically that provide another means of communicating information on ICMC certification and other aspects of cyanide management at the site. Community visits have been arranged since the last audit in 2022 with the most recently in June 2025. A total of more than 60 interviews, mine tours, focus groups, public information sessions, face to face meetings have been conducted.

Literacy around the local population remains high and is not considered a significant issue (average rate: 96% as per eight villages and 98% as per Uşak province). 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). Review of presentation materials and associated photographs associated with current initiatives indicates that External Affairs Department has provided general information about the management and use of cyanide to various stakeholder groups, in a verbal, visually supported, and culturally sensitive format.

Reviews of incident records from 2022 through to 2025 indicate that there have been no major cyanide exposure incidents, hospitalizations, or fatalities since last audit in 2022. Cyanide has never been released off site, and no cyanide releases have occurred, on or off site, that have had a significant adverse effect in any discharge limit exceedances. The information below details how information is made publicly available regarding the following release or exposure incidents.

a) Cyanide exposure resulting in hospitalisation or fatality.

b) Cyanide releases off the mine site requiring response or remediation.

c) Cyanide releases on or off the mine site resulting in significant adverse effects to health or the environment.

d) Cyanide releases on or off the mine site requiring reporting under applicable regulations.

e) Releases that are or that cause applicable limits for cyanide to be exceeded.

Since 2022, there have been no reportable “major” and “severe” cyanide releases on or off the mine site that have resulted in adverse effects to health or the environment. If an incident resulted in hospitalization, however, it would be considered a “major” or a ”severe” incident and the General Manager of the mine is required to inform the General Manager, who acts as country lead for Eldorado, in Ankara, who would in turn take the lead in informing regulators and government authorities in both regions. Two “minor” damages and one near-miss occurred in the South and North Leach areas during the manoeuvre of a forklift and damaged the forklift’s door during mixing at the ADR. There were no cyanide spillage/release, and all actions were evaluated by the related departments for correction action.

The Stakeholder Engagement Plan and , Kışladağ Emergency and Crisis Management Plan, requires that an appropriate press release is prepared by or at the direction of the mine General Manager to accurately report the particulars of an event, probable cause, individuals involved, actions taken, and other appropriate information. If a cyanide exposure incident were to occur, communications will be controlled via the Kışladağ Emergency and Crisis Management Plan , and the Cyanide Management Plan). The Emergency Management Team and Contact Group for the incident would coordinate with the EA Manager (as the Communication Coordinator/Spokesperson) and the mine General Manager to ensure that 1) the responsible regulatory agencies and officials are immediately notified; 2) ICMI is notified; and 3) the causes of the incident and associated corrective/preventive action is discussed in subsequent meetings with communities and regulatory authorities. Other Tüprag management staff may be involved in the coordination of such discussions, as appropriate for the nature and scale of the incident.

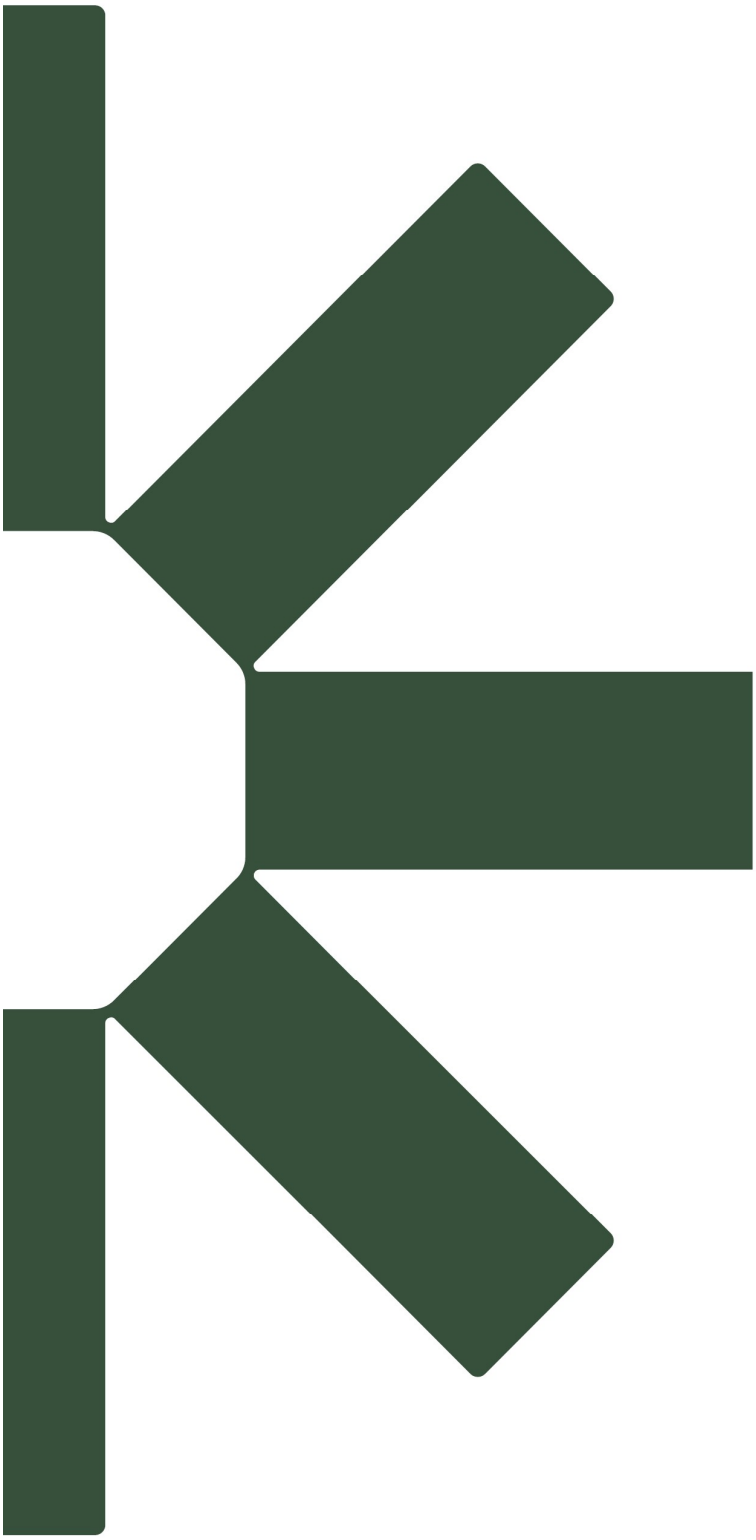
In the event of an incident resulting in hospitalization or a fatality, the procedures set out in the ECMP would apply. Communication protocols would be triggered whereby the Communication Coordinator/Spokesperson will arrange to contact public institutions, organizations and stakeholders and prepare 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.

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 (2024) would include information on any cyanide exposure or release were this to occur, with none having occurred to date. All of the social and environmental impacts detailed within the Sustainability Report are ascribed to the relevant operation. This report is available on the corporate website for public download. Eldorado Gold Sustainability Report provides Environmental Performance disclosure according to GRI reference indicators GRI

303-2 EM-MM-140 a.2 (number of incidents of non-compliance associated with water quality permits, standards, and regulations) and GRI 307-1 (non-compliance with environmental laws and regulations). According to the Sustainability Report in conformance with “open, effective, honest and transparent communication”, Eldorado Gold self-report minor and major environmental incidents internally and consider incidents that violate applicable environmental regulations to be “major”, regardless of the consequences. In the last 3 years, Eldorado reported no “major” environmental incidents and no significant spills. Eldorado Gold has also established an internal online incident reporting system (named HSSE Report-Health, Safety, Social and Environment Report) where “minor” environmental incidents are reported to the corporate monthly by Kışladağ Gold Mine. INX system records provide investigation and corrective action procedures implemented by site to determine root cause of the incident.

The regulators and authorities will in turn inform communities of the incident, through direct communication to the local elders, stakeholders, and media. Both the ICMI and AFAD would be notified of such incidents on a timely manner. Reportable spills data according to their levels is also required to be recorded to the company and governmental stakeholders.

SLR



Making Sustainability Happen