INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Code Recertification Audit Gold Mining Operations

Summary Recertification Audit Report

Evander Gold Mine Kinross Metallurgical Plant South Africa

10th – 14th March 2025

For the International Cyanide Management Institute Cyanide Code

Name of Operation:	Evander Kinross Gold Processing Plant
Name of Operation Owner:	Pan African Resources
Name of Operation Operator:	Evander Gold Mine
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Location and Process Description

The Evander Gold Mines: Kinross Metallurgical Plant at Pan African Resources is located in Evander, Mpumalanga, South Africa. It is a concentrator plant that processes two sources, namely Run of Mine (ROM) and Surface Sources, in two completely separate streams. The ROM plant produces gold in two products:

- Free gold bullion at approximately 40% Au,
- Carbon in Leach (CIL) gold contained on activated carbon

The Surface Source stream produces gold in Carbon in Leach with activated carbon.

1. Historical description

Since the last recertification, the Evander Gold Plant has gone through various phases, driven by the ore reserves, production costs, availability of sources, and the commissioning of the new Tailings Treatment Elikhulu Gold Plant. The phases significantly influenced the plant's operational strategies.

The first phase, after the previous recertification, included the plant treating underground ore and filling the gap in excess treatment. Due to economic considerations, it was decided to close the plant in 2017. As a result, the operation went into a shutdown mode.

During the planning for the shutdown, additional underground sources were found, and together with the availability of surface rock dump sources, the economic feasibility of the plant was reassessed, and it was decided to extend the Life of the Plant by 12 years. The operation moved from a shutdown mode into a normal operational mode, and the required changes to getting the plant back to a safe operating condition were commenced at the beginning of 2018.

The current operations include the Elikhulu Plant. For the purposes of Cyanide Code compliance, the Evander Gold Plant ensures that all slurry pumped from the Evander Plant Tailings tank (its Code Compliance Point) is below the 50 mg/L WAD (Weak Acid Dissociable) cyanide limit. The Elikhulu slimes dam retreatment plant was constructed and commissioned at the end of 2018, resulting in the Residue from the Evander Gold Plant now being pumped to the Elikhulu residue tank, from where the combined residue volume (including other treated sources) is now pumped from Elikhulu to two residue dams.

2. ROM Process Description

The ROM plant consists of milling, gravity, thickening, Leach, and CIP (Carbon-in-Pulp) circuits. The milling section consists of a 2000-ton, Run Of Mine (ROM) silo, a conveyor belt that feeds the Vicor 4x6 (4m diameter, 6m length) overflow autogenous mill, at an average feed rate tonnage of 40 tons per hour. The mill effluent discharges into the mill effluent sump and is pumped to a 500CVX Cavex cyclone. The Cavex cyclone produces two products, namely the overflow and the underflow. The overflow gravitates to the Trash screen. The underflow is directed to a vibrating screen to remove the +4mm pebbles. The screen undersize –4mm gravity feed enters into an XD30 Knelson Concentrator. The screen oversize +4mm returns to the mill feed hopper for regrinding.

The gravity circuit consists of an XD30 Knelson concentrator and a Gemini redress table, which recovers free gold. The concentrate from the XD30 Knelson concentrator reports to a gravity stock tank, where it is then redressed twice a week over the Gemini table. The Gemini table free gold cut is subsequently further processed in the Kinross plant smelt house to produce a bullion bar.

The cyclone overflow is screened over a trash linear screen. The undersize of the trash screen gravitates to a 45m diameter Thickener to thicken the pulp to the desired relative density of 1.500. The thickened pulp is then pumped with a centrifugal pump to the CIL conditioner tank. Lime is added to the conditioner to adjust the pulp pH to 10.5. The pulp from the conditioner is then pumped to the CIL tank 1. From the CIL tank, the pulp gravitates to CIL tank 2. Tank 2 gravity feeds to Tank 3, then Tank 4 until it reaches Tank 5, which is the last tank of the CIL.

Cyanide at a dosing rate of 0.7kg/ton is added to tank 1. The cyanide addition is controlled by means of a TAC 1000 Cyanide controller. The TAC 1000 is programmed such that it controls the cyanide addition at a set point. Carbon at +/- 15g/litre pulp is maintained in each tank. Virgin or regenerated carbon is added to tank 6, the last tank of the CIP circuit. The carbon is then transferred to tank 5 through an interstage pump system. The same method is employed to transfer the carbon through tank 4, tank 3, tank 2, and tank 1. From tank 1, the loaded carbon is pumped across a vibrating screen. The purpose of this screen is to wash the carbon clean before it gravitates into the loaded tank.

The loaded tank has a capacity of 5 tons. When the loaded tank has 5 tons of carbon, the carbon is pumped to the elution column. The gold is eluted from the carbon with a hot 3% caustic solution. The elution process takes place at 130ºC and lasts approximately 18 hours. The caustic circulates through the heat exchangers, then

through the column, and finally to the electrowinning cells. In these cells, the gold is plated out onto steel wool cathodes, which are subsequently smelted.

When the gold has been removed from the carbon, and the carbon has cooled, the eluted carbon is transferred to the regeneration circuit. Here, it is heated to approximately 740ºC in a steam atmosphere. In the first zone of the regeneration kiln, volatile organic compounds still adsorbed on the carbon are removed. The pores in the activated carbon re-open in the second zone, re-activating the carbon. From the kiln, the carbon is quenched and sized on a 1 mm vibrating kiln screen, then fed into the acid wash column.

The carbon is washed with diluted hydrochloric acid (3%) at ambient conditions to remove calcium and some of the base metals adsorbed by the activated carbon, which would otherwise interfere with the rest of the circuit. After the acid washing process, the carbon is sized on a 1mm vibrating Regen screen before being returned to the CIP plant. Fine carbon is extracted and dispatched for gold by-product recovery.

The tails from CIP tank 6 are discharged into a residue sump and then pumped, using two centrifugal pumps in series, to the Elikhulu plant tailings tank.

The knelson concentrate is leached in the intensive leach reactor in the smelthouse. This process is carried at 2% cyanide. The caustic solution is used to control the pH to above 11 before cyanide addition. The pregnant solution from the leach is pumped into the pregnant solution tank and circulated through the electrowinning cell at room temperature. Caustic is further added at about 3% during electrowinning to enhance gold plating on the cathodes. The tailings of the leach reactor are pumped to the CIL circuit.

3. Surface Sources Process Description

The Surface Plant source material consists of materials mined and transported to the plant, where they are stockpiled for treatment. The process consists of milling, thickening, and CIL (Carbon-in-Leach) circuits. The milling section has two Vicor 6x4 overflow ball mills. The mill conveyor belts are fitted with the feed bin systems. The ore is fed on the conveyor belts through the feed bin with the use of front-end loaders. The mill feed is controlled at an average feed rate of 35 tons/hour. The mill effluent discharges into the mill effluent sump and is pumped to a 500CVX Cavex cyclone. The Cavex cyclone produces two products, namely the overflow and the underflow. The overflow gravitates to the Trash screen. The underflow flows into the mill feed hopper for regrind.

The cyclone overflow is screened over a trash linear screen. The undersize of the trash screen gravitates to a 45m diameter Thickener to thicken the pulp to the desired relative density of 1.500. The thickened pulp is then pumped with a centrifugal pump to the CIL conditioner tank. Lime is added at the conditioner to adjust the pH of the pulp to 10.5. The pulp from the conditioner is then pumped to the first CIL tank, which is tank 1. From Tank 1, the pulp gravitates to CIL Tank 2, then Tank 3 until it reaches Tank 6, which is the last tank of the CIL.

Liquid Sodium Cyanide is delivered by bulk tanker from the SASOL (Sasol South Africa (Pty) Limited) Cyanide Production Plant and deposited into Sodium Cyanide Storage Tanks in the Gold Processing Plant. Cyanide at a dosing rate of 1.2kg/ton is added to tank 1. The cyanide addition is controlled by means of a TAC 1000 Cyanide controller. The TAC 1000 is programmed such that it controls the cyanide addition at a set point. Carbon at +/- 15g/litre pulp is maintained in each tank. Virgin or regenerated carbon is added to tank 6, the last tank of the CIL circuit. The carbon is then transferred to tank 5 through an interstage pump system. The same method is employed to transfer the carbon through tank 4, tank 3, tank 2, and tank 1. From tank 1, the loaded carbon is pumped across a vibrating screen. The purpose of this screen is to wash the carbon clean before it gravitates into the loaded tank.

The loaded tank has a capacity of 1.4 tons. When the loaded tank has 1.4 tons of carbon, the carbon is pumped to the elution column. The carbon is stored in the elution carbon column until a second batch of 1.4 tons is pulled from tank 1 to the loaded tank. The gold is eluted from the carbon with a hot 3 % caustic solution. The elution process takes place at 130ºC and lasts approximately 18 hours. The caustic circulates through the heat exchangers, then through the column to the electrowinning cells. In these cells, the gold is plated out onto steel wool cathodes, which are subsequently smelted.

The tails of CIL tank 6 discharges into a residue sump and is combined with the ROM tails, and is then pumped, with two centrifugal pumps in series, to the Elikhulu plant tailings tank.

Auditor's Finding

This operation is

X in full compliance

in substantial compliance *(see below)

not in compliance

with the International Cyanide Management Code.

* The Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The Plan must be fully implemented within one year of the date of this audit.

This operation has not experienced compliance problems or significant cyanide incidents during the previous three-year audit cycle.

Audit Company: Eagle Environmental

Audit Team Leader: Arend Hoogervorst
& Technical Auditor

E-mail: arend@eagleenv.co.za

Dates of Audit: 10th – 14th March 2025

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

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

Evander Kinross Gold Processing Plant

27/10/2025

Facility | Signature of Lead Auditor | Date

Audit Findings

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.

X in full compliance with

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

 not in compliance with

Basis for this Finding/Deficiencies Identified:
Sodium cyanide is supplied to Evander Gold Mining Company (EGM) Kinross Gold Processing Plant in liquid form by Sasol South Africa (Pty) Limited (Sasol) and delivered by Tanker Services Food and Chemicals Division (Tanker Services). A contract is currently not in place or signed, but Sasol, a certified cyanide producer, is the only supplier of liquid cyanide to EGM. The Mine can be fully compliant as long as it is supplied by a certified Producer. Sasol is a fully compliant, certified producer, and its recertification was published on the ICMI (International Cyanide Management Institute) website on 22nd April 2025. Thus, EGM is deemed to be fully compliant.

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.

X in full compliance with

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

 not in compliance with

Basis for this Finding/Deficiencies Identified:
There is only one component in the Chain of Custody from the producer (Sasol) to the mine (EGM): Tanker Services. Chain of custody records, including EGM purchase orders, Sasol Dangerous Goods Declaration Notes, Sasol Delivery Notes, Sasol certificates of analysis, Sasol invoices, and Tanker Services delivery notes, were sampled in 2022, 2023, and 2025. Tanker Services was recertified as an ICMI Transporter on 22 May 2024.

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

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

X in full compliance with

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

□ not in compliance with

Basis for this Finding/Deficiencies Identified:
The new liquid sodium cyanide unloading and storage facility documentation was audited in a previous certification audit. The facility was designed by Engineers from Harmony Engineering, Welkom, and ELROX Engineering and inspected by the cyanide producer's representative. Design drawings were sampled and signed by Engineer S I Bester, ECSA (Engineering Council of South Africa), Registration number 850123. Sasol technical inspection reports by Mosala Mokoena, Sasol Specialist Product Life Cycle, dated 24/2/2023 (score – 92%) and 11/7/2024 (score – 97%) were sighted. No Sasol technical inspection was carried out in 2022 due to COVID-19, and the 2025 inspection is still due.
The unloading and storage area is located away from people and surface waters, and unloading takes place on a concrete surface, with the concrete offloading bay draining into the cyanide bund area. The cyanide storage area is fenced off, and entry gates are locked and separate from all incompatible materials. The cyanide offloading area is located inside the main plant security fence with access control. The cyanide storage tanks are located in an open-air environment. This was confirmed during the site inspection.
The cyanide tanks are placed on solid concrete foundations inside a concrete bund area. This was verified through the sighting of photographs taken during construction showing the concrete tank foundations and the concrete bund construction. Secondary containment is constructed of concrete coated with an additional sealant. The bund condition was good, but there was evidence of some minor cracking of the surface sealant due to being

in direct sunlight. The Flood Testing of Cyanide Bund Area procedure, requiring annual flood tests, was sighted. Flood tests carried out on 16-6-2022,22-03-2023, 27-3-2024, and 6-3-2025 showed no significant losses.
Tanks are equipped with ultrasonic level detectors, and a high-level alarm will sound at the offloading area when the tank reaches 85%. The tank levels are shown on the control room SCADA (**S**upervisory **C**ontrol **A**nd **D**ata **A**cquisition system) screen, as well as via the alarms. The procedure requires that tank levels be verified by manual calculation as a backup to electronic measurement. The instrument technician performs a weekly PM (Planned Maintenance) inspection of all instruments (including the level detection instruments). A weekly electrical inspection of the cyanide facility checks that all electrical circuits are working and tests the cyanide alarm.
A liquid cyanide offloading procedure is in place and requires the following: -
"…Section 7. Metallurgist's Duties before Delivery
a) Sodium cyanide storage tank level must be confirmed by the Metallurgist (Reference to the Metallurgist Calculation Spreadsheet: Reagent Tons) prior to cyanide offloading. The manual calculation must align to the capacity on the SCADA…."
"…Section 5. Emergencies on Sasol Products en route and at Customer Sites
e) When there is a cyanide spill from the tanker in the Customer security airlock. Wear the full cyanide protective PPE. The CQP (Customer Qualified Person) must use to (sic) the spill kit as per requirements and neutralise the spill with ferrous sulphate…"

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

X in full compliance with

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

□ not in compliance with

Basis for this Finding/Deficiencies Identified:
No solid sodium cyanide is used on the plant, with only liquid cyanide delivered in bulk, dedicated tankers by Tanker Services. No empty cyanide drums, plastic bags or liners are used on-site to store liquid sodium cyanide.
A Liquid cyanide offloading procedure is in place, which requires the tanker driver to rinse out and wash the outer surface of the offloading hose thoroughly with water, wash out the pipe on the coupling, and wash the outer surface of the tanker, air hose, valves, hose connection points and connection blank flanges with copious amounts of water. The maintenance of the pipes, valves, and couplings on the Plant side falls under the Plant PMS (Planned Maintenance System) for planned inspections. The transporter is responsible for the hoses and valves associated with the bulk delivery tanker. Timely cleanup of any spills of cyanide during the transfer of liquid cyanide from the sodium

cyanide tanker is covered in the offloading procedure under Section 5, Emergencies on Sasol Products en route and at Customer sites, and Section 10, Offloading.
There is a "Buddy" procedure in place, requiring a second individual to observe from a safe area, wearing appropriate PPE (Personal Protective Equipment) and being ready to raise the alarm in case of cyanide emergencies. The Liquid cyanide offloading procedure describes the roles of the CQP (Company Qualified Person) and the Tanker Services driver in the task lists, and refers to the use and requirement of "buddies".
Site procedures do not refer to the addition of dye to the cyanide storage tanks. Sasol is an ICMI-certified liquid cyanide producer that delivers liquid cyanide to ICMI signatories, which is dyed red during production with Carmoisine. The Sasol Safety Data Sheet, Sodium Cyanide Solution, Version 1, Revision Date 09-09-2022, issued to EGM includes in Section 9. Physical and chemical properties, Colour: Light to dark red.

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

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

	X in full compliance with
The operation is	□ in substantial compliance with **Standard of Practice 4.1**
	□ not in compliance with

Basis for this Finding/Deficiencies Identified:
Evander sends its tailings for disposal to the adjoining separate Evander Elikhulu Plant tailings treatment operation, where Elikhulu mixes them with tailings from other reclamation operations run by Elikhulu. No return water is sent back to the Evander Process Plant from Elikhulu.
If the WAD cyanide leaves the Evander tailings tank at below 50 mg/l WAD cyanide or ENTERS the Elikhulu tailings tank at below 50mg/L WAD cyanide, irrespective of which part of the TSF (Tailings Storage Facility) the "Evander Tailings" enters, it would be below 50 mg/L WAD cyanide. Thus, tailings disposal and management are not within the scope of this audit. According to the ICMI website, the Evander Elikhulu Plant is not currently designated for Certification.
The Evander Kinross Gold processing Plant has 81 cyanide procedures in place, including 21 engineering procedures. There are 3 environmental procedures in place that relate to cyanide.
The plant has various procedures that identify and account for the assumptions and parameters on which the facility design was based, as well as any applicable regulatory

requirements, to prevent or control cyanide releases and exposures, consistent with applicable requirements. The High Cyanide Levels in Residue Slime procedure states that, "WAD cyanide readings not to exceed 50 ppm in the residue slime at all times (alarm at SCADA at 45 ppm is programmed)". An EGM managerial instruction is in place (sighted "Efficient control of WAD cyanide in tailings dated 9/8/2020) managing the EGM WAD cyanide in the slurry pumped to the Elikhulu tailings tank to be at less than 50 mg/l WAD cyanide. Regulatory freeboard requirements are incorporated into the parameters of the Probabilistic Water Balance. The plant has procedures and practices in place describing activities necessary for safe and environmentally sound operation of the facility, including water management, inspections, and preventive maintenance activities. The Cyanide Facility Inspections Procedure requires that the following inspections must be conducted: Pre-Use Inspections, Shift and Daily Inspections, Monthly Inspections, and Quarterly Inspections. Monthly inspection books showing daily inspections in the cyanide offloading and storage area, including the emergency cabin at offloading, emergency showers at offloading, offloading cyanide area inside of cyanide tanks, cyanide antidote kit, and cyanide bund area were sighted. The books date back two years. (Sighted February 2023 – February 2025) The offloading inspection checklists kept at the emergency cabin were also sighted and sampled. Operational inspections include: - the CIL (Carbon in Leach) section, the Elution plant, the CIP (Carbon in Pulp) section, Leach, Residue, Manager's daily data sheet files, Safety officers' inspections, Treatment section, and Residue lines, as well as the process water dam, surge dams, and toe dams.

The plant has standby units for all key processes, such as Cyanide Pumps 1 and 2, Residue pumps 1 and 2, Surface CIL feed pumps, CIL pumps, Flocculent pumps, Lime feed pumps, Thickener pumps, and Mill return water pumps. These are all subject to a standby unit's daily checklist. The units without standby pumps are also listed on the daily checklist, and their performance is also checked daily. Maintenance records were sampled, revealing the job cards raised for breakdowns and for work generated from daily checks.

The plant has a Change Management procedure, and 2 MOC (Management of Change) examples were sighted and sampled: - 1. Removal of Amyl Nitrite from Tripac-Cyano Antidote, dated 27 October 2023 and signed by the Safety Officer, but not the Environmental Officer, because this was not applicable. 2. Replacement of Tripac-cyano Kit antidote with hydroxocobalamin CyanoKit dated 6 August 2024 and signed by the Safety Officer, but not the Environmental Officer, because this was not applicable.

The plant has various cyanide management contingency procedures for non-standard operating situations that may present a potential for cyanide exposures and releases. The plant is stopped in the case of breakdowns identified during inspections requiring maintenance, as well as during planned monthly shutdowns. A mini-risk assessment precedes all maintenance before it commences. The Temporary Closure of Cyanide Facility in case of Emergencies procedure includes provisions for temporary closure or cessation of operations due to situations such as work stoppages, lack of ore or other essential materials, economic factors, civil unrest, or legal or regulatory actions. Section 5, iv, of the procedure states that the Emergency Management and/or Response team would consider appropriate management of the temporary closure or cessation and document the required actions of how cyanide would be safely managed. The

Probabilistic Water Balance and plant operational strategies did not identify any scenario where the plant needs to be stopped to maintain the water balance.
The physical integrity of the surface water diversion is inspected monthly, and annually, an external consultant conducts an audit for the mine. During the dry season, Ujulwethu Contractors (Proprietary name) are issued purchase orders to remove all excessive silt and vegetation.
Specific inspections are covered in various planned inspections, checklists, and Planned Maintenance Inspections.

1. **Tanks**
   The Cyanide Facility Inspection procedure checklist in books refers to operational inspections and includes tanks, spillage pumps, cyanide pipelines, pumps, bund areas, and valves for leaks. The books were checked, and daily inspections were ticked daily and listed monthly, and they were found to be complete. Planned maintenance inspections include thickness testing, which is done annually. A train of CIL tanks (1-4) was decommissioned and will be demolished later due to failing the thickness tests. The second four CIL tanks have been refurbished. Sampled and reviewed Thickness Testing Reports for ROM CIL Tank No. 4, Surge Tanks 1 – 5, and Cyanide Tank 1. The Weekly Boilermakers Inspection of Cyanide Tanks was sampled, covering the condition of platforms, handrails, guards, structures, walkways, and piping. Also sampled and reviewed were the Weekly Fitter inspection of cyanide facilities, the Weekly electrical inspection of the cyanide facility inspecting cables, lighting, and the cyanide alarm, and the Weekly Instrumentation inspection on Cyanide, checking cyanide level controllers, valve condition indications, cyanide pumps VSDs (Variable Speed Drives), and shut-off valves. Throughout the period since the last recertification audit, thickness testing has continued on all tanks. Detailed thickness testing results have not been sighted for all the tanks, but work orders were sampled and checked. The thickness testing results have guided which tanks would be used, as reduced throughput has allowed more tanks to be taken offline for maintenance.
2. **Secondary Containments**
   Monthly operational inspection books also include bunds. Completed books from January 2021 to date were sighted and sampled. Cyanide Bund Daily Planned Maintenance Inspections done on 01-01-2024, 03-01-2022, and 03-01-2022 by Gcina Mkhonto (Senior Process Supervisor), checking accumulation of stormwater, spills of materials, bund flexible floor joints, no accumulation of waste materials or sand and silt in the bund, and loss of bund integrity, were sampled and reviewed. All are found in order. Monthly CIL PM (Planned Maintenance) Bund Inspection by Gcina Mkhonto, done on 04-01-2024 and done on 05-02-2024, checking resistant linings not damaged, no concrete cracking in the bund, and expansion joints acceptable, were sampled and reviewed. All were found in order.
3. **Pipelines, Pumps, and Valves**
   The Cyanide Facility Inspection procedure daily checklist in books refers to and includes tanks, spillage pumps, cyanide pipelines, pumps, bund areas, and valves for leaks. The books were checked, and daily inspections ticked daily, listed

monthly, and found to be complete. Weekly Pump Inspections are carried out by a Fitter, including pumps, associated pipes, and valves. Items to be checked include leaks and dripping, pump connections and couplings, pipe labelling, direction of flow, and condition of pumps, piping, and valves. Spillage Pumps' weekly planned maintenance inspections were sampled dated 11-1-2024, inspecting pump casing, discharge outlets, suction pump, pipe abnormal noise, leaks and dripping, pipe condition, and pipe labelling. Weekly mechanical maintenance on cyanide 15 and 25 pumps were sampled, checking Work Orders PM14576, PM14591, PM14616, PM14630, and PM14650, dated 07-01-2022. The Monthly Maintenance Checklist for Residue Pump PMP01, dated 14-01-2022, dated 11-01-2024 for Residue Pump PMP02, and dated 11-01-2024 for Residue Pump PMP03, were sampled and reviewed.

4. **Ponds and Impoundments**

   The Mechanical weekly inspections on the Toe Dam, dated 04-01-2022 by Thato Gaoraelwe (Fitter) and dated 04-01-2024, respectively, were sampled and reviewed. The check items included checking the dam level, checking pump operation, checking vegetation around the pump installation, checking the priming suction tank, checking the suction hose, and checking that the dam was not overflowing. Also sampled were the mechanical weekly inspections of the surge dam dated 04-01-2022, 29-08-2023, and 04-01-2024 by Thato Gaoraelwe (Fitter), respectively, checking dam level, pump operation, vegetation around the pump, dam separation wall for blockages, and dam selection valves.

The Cyanide Facility Inspections procedure requires: -

- Pre-Use Inspections
- Shift and Daily Inspections
- Monthly Inspections
- Quarterly Inspection.

Weekly inspections are undertaken by Fitters, Boilermakers, instrument technicians, and Process Operators to identify problems at an early stage. The weekly Process and Engineering inspections are done using the DMS (Drumblade Maintenance & Safety) PMS (Planned Maintenance System) system. PM (Planned Maintenance) work orders for Fitters (weekly pumps), Boilermakers (weekly boilermaker for cyanide area), Electricians (weekly electrical inspection of cyanide area), Process weekly cyanide tank inspections, Technicians weekly cyanide instrument inspections, and Fitters (weekly process dam maintenance) were sighted and sampled. The frequency is deemed sufficient to assure and document that cyanide facilities are functioning within design parameters. Work Orders, job cards, and checklists include the date and name of the inspector and any documented observed deficiencies. Records are maintained in the DMS 2012 PMS system or the Microsoft Access Database. An electronic review of records was carried out. Additional Work Orders and Job cards are raised if inspectors cannot make an on-the-spot repair.

The PMS computerised system is a DMS 2012 system containing all of the plant's cyanide facilities. The system comprises complete histories of all planned and breakdown maintenance from 2021 to the present. A job card is generated for deficiencies detected by process and engineering inspections. The cyanide tank level system is inspected and

maintained by the Instrumentation Department, and job cards are issued for work done. Maintenance done is shown on the job card, filed, and recorded on the PMS system. In addition, various supervisors conduct weekly over-inspections to verify PM inspection standards. The following PM over-inspections were sampled: -
A) Process Supervisor – over-inspection dated 23-03-2023 and 03-01-2024;
B) Mechanical Supervisor – over-inspection dated 23-03-2023 and 01-0102024;
C) Instrumentation Supervisor – over-inspection dated 22-03-2023 and 02-01-2024;
D) Electrical Supervisor – over-inspection dated 22-03-2023 and 02-01-2024;
E) Manager – over-inspection dated 03-01-2024; and
F) Engineer – over-inspection dated 04-01-2024.
The operation does not require emergency power to operate pumps and other equipment to prevent unintentional releases and exposures in the event its primary power source is interrupted, because all plant drainage following a power outage will be contained within the bund areas and the residue bund.

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

	X in full compliance with
The operation is	□ in substantial compliance with **Standard of Practice 4.2**
	□ not in compliance with

Basis for this Finding/Deficiencies Identified:
The bottle roll test program covers the underground and surface sources. It characterises the reagent and cyanide consumption for the various sources on a monthly basis. The plant treats one surface source stockpile at a time. SGS Laboratories bottle roll tests for underground ore include cyanide consumption, pH, and Lime consumption. The SGS Laboratories tests included cyanide consumption for surface source reclamation ore, and the bottle roll tests included five surface sources. It was noted that cyanide consumption is significantly higher for surface sources than for underground sources. Samples are taken from the stockpiles and sent to SGS Laboratories for diagnostic leaching and bottle roll leaching to understand cyanide consumption before loading to the plant mills.
A ratio control system using the thickener underflow mass flow and variable-speed pumps for the low-grade section has been installed. This will reduce the incidence of manual feed control when a high tonnage feed rate results in elevated WAD cyanide values.
The high-grade (underground ore) stream is controlled by online measurement of free cyanide using a TAC 1000 analyser. Primary cyanide dosing ratio control with tonnage feed rates, linked to the variable speed cyanide dosing pumps, is in place. The TAC 1000 output (secondary control) is also linked to the variable speed pumps, and so controls

cyanide addition to the dosing points. This system prevents spikes in WAD cyanide levels during high-tonnage feed rates.
The low-grade (surface sources) stream is controlled by online measurement of free cyanide using a TAC 1000 analyser. The TAC 1000 output is linked to the variable speed pumps and controls cyanide addition to the dosing points. There are no ratio controls with tonnage feed rates, which results in an increased number of WAD cyanide exceedances in the case of high tonnage feed rates. Manual backup titrations are done to cross-check the TAC 1000 results. Silver Nitrate and rhodamine are used as indicators.

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

X in full compliance with

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

□ not in compliance with

Basis for this Finding/Deficiencies Identified:
The plant has a spreadsheet-based probabilistic water balance (PWB) in place. The water balance includes the following: - tailings deposition rates from the Plant compliance point (because the operation does not have its own TSF), precipitation, evaporation, seepage, and undiverted run-on from upgradient areas.
There are no cyanide treatment systems for surface discharges, as no discharge takes place. The water balance takes into consideration variability in the daily 24-hour rainfall events. The variability in rainfall is taken into account manually by using the statistical data in the rainfall database, which covers daily total rainfall for both wet and dry seasons. The following data were sighted month by month: - 1 in 50-year 24-hour event - 150 mm; - 1 in 100-year 24-hour event - 170mm; Year maximum 24-hour event; Year minimum 24-hour event; and Year Average 24-hour event.
PWB spreadsheets for 2022, 2023, and 2024 were sighted and reviewed. The PWB is confirmed as it accounts for the natural variability and uncertainty of precipitation and evaporation rather than on average precipitation and evaporation rates.
Rainfall data is used from the Elikhulu rain gauges (the TSF is situated next to the plant, and rainfall is checked and recorded daily).
An evaporation database from 1988 to 2020 from the South African Weather Bureau (SAWB) is used in the model. Run-on is included in the plant catchment area and runs into the catchment dam. Evander is not in an area where significant freezing and thawing conditions occur, and thus, the precipitation accumulation from this is insignificant. No discharges to surface water occur under normal conditions. Abnormal precipitation events are treated as emergencies under the emergency plan and managed in accordance with the monitoring procedures. All internal storage facilities are included in the PWB, and their freeboard operating parameters are included in PWB calculations.
The plant keeps records of daily 24-hour rainfall for each year, and the maximum, minimum, 1:50-year, and 1:100-year 24-hour storm events are used in calculating the

solution dam freeboard. If the freeboard is inadequate, the operating dam freeboard is revised. This may differ for wet and dry seasons.
The weekly planned maintenance Fitter mechanical inspections of the surge dam and process water dam include checking dam levels for overtopping and to avoid unplanned discharge.

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

X in full compliance with

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

□ not in compliance with

Basis for this Finding/Deficiencies Identified:
Evander sends its tailings for disposal at the Elikhulu tailings operation, where Elikhulu mixes them with tailings from other reclamation operations run by Elikhulu. No return water is sent back to the Evander Process Plant from Elikhulu.
If the WAD cyanide leaves the Evander tailings tank at below 50 mg/l WAD cyanide or ENTERS the Elikhulu tailings tank at below 50mg/L WAD cyanide, irrespective of which part of the TSF the "Evander Tailings" enters, it would be below 50 mg/L WAD cyanide.
Elikhulu needs to be audited separately for its management of the tailings facility to demonstrate that, to be Code compliant, it must ensure that WAD cyanide levels at the tip points are below 50mg/L WAD cyanide. However, the Evander Elikhulu Plant is not designated for Certification, according to the ICMI website.
The Evander Plant measures WAD cyanide in the residue tank at the plant using an online WAD 1000 analyser.
Period 1 – February 2022 to February 2023. 40 exceedances occurred during this period. The cause for these exceedances included problems with the blending of three different source materials, and the changes between the various blends. This resulted in the spiking of WAD cyanide levels. Experimentation was necessary to achieve the correct ratios required. Exceedances occurred on: - 24th April 202(90 mg/L WAD cyanide), 1st March 2022 (99mg/L WAD cyanide), 19th February 2022 (99 mg/L WAD cyanide), 19th June 2022 (64 Mg/L WAD cyanide), 24th May 2022 (72 mg/L WAD cyanide), 26th September 2022 (99 mg/L WAD cyanide), 30th September (59 mg/L WAD cyanide), 30th October 2002 (58 mg/L WAD cyanide), 25th November 2022 (62 mg/LWAD cyanide.
Period 2 – February 2023 to February 2024. Only 8 exceedances occurred during that period because the number of surface sources dropped, and the tonnage also dropped significantly. Exceedances occurred on: - 29th & 31st March 2024 (76 mg/L WAD cyanide), 22nd April 2024 (99 mg/L WAS cyanide), 2nd September 2024 (74 mg/L

WAD cyanide), 8th October 2024 (58mg/L WAD cyanide), 2nd, 3rd & 4th February 2024 (57mg/L WAD cyanide.

Period 3 – February 2024 to date – No exceedances. There are no surface source materials; the plant only runs ROM sources and has significantly lower quantities.

Although there were WAD exceedances, the operation thoroughly investigated the causes and took remedial action to reduce the frequency and extent of exceedances. No wildlife or livestock mortalities have been reported since the previous audit.

The Evander Plant dams' samples show that the WAD cyanide values are less than 50 mg/l, with the maximum at 0.1 mg/l WAD cyanide. Thus, no measures to restrict access by wildlife and livestock are necessary.

The levels of cyanide in open waters are significantly lower than the 50mg/L WAD cyanide limit, and thus, it can be concluded that the lack of birdlife, wildlife, and livestock mortalities results from sound WAD cyanide management.

Standard of Practice 4.5

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

X in full compliance with

The operation is

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

□ not in compliance with

Basis for this Finding/Deficiencies Identified:

No licensed discharge of mine water to surface water is permitted (A No-discharge Water Licence is in place). The two sampling points downstream of the Plant show Free cyanide results of less than 0.05mg/l, which are below the limits of detection. The results were from January 2022 to December 2024. No mixing zone has been established by the jurisdiction for the site. No indirect discharges have necessitated remedial activity.

Standard of Practice 4.6

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

X in full compliance with

The operation is

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

□ not in compliance with

Basis for this Finding/Deficiencies Identified

In order to manage seepage to protect the potential beneficial use of groundwater beneath and/or immediately downgradient of the operation, the plant surface is covered by concrete and tarred roads, with water trenched to silt traps and water containment dams,

from where water is returned to the plant. No beneficial uses of groundwater were identified by the jurisdiction, and there are currently no uses for underground water. No borehole water is used from the mining property.
There is no numerical standard established by the applicable jurisdiction for WAD cyanide or any other species of cyanide in groundwater. Therefore, there are no compliance points below or downgradient of the gold plants or tailings facilities. No mill tailings are used for underground backfill. No beneficial uses have been identified by the applicable jurisdiction, and no remedial activity has been required to be done to prevent further degradation or restore beneficial uses.

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

X in full compliance with

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

□ not in compliance with

Basis for this Finding/Deficiencies Identified:
This was audited at a previous certification audit. "The leach, CIP, and residue tanks are placed inside bunds. Based upon knowledge of engineering and construction practice when the plant was built 40 years ago, it can be concluded that the tank bases are all solid concrete - ring beams were not used in South Africa during this time.". The reagent-strength cyanide tanks are placed on a solid concrete foundation inside a concrete bund. All tanks' secondary containment bunds are constructed of concrete.
With regard to the bund areas, there are no changes since the previous re-certification audit, and the volume calculations are still valid:
1. CIL bund volume 702m^3, plus linked holding tank with capacity of 263m^3 - largest tank 834 m^3.
2. CIP bund volume 375 m^3, largest tank 200 m^3,
3. Residue tank bund volume 351m^3, largest tank 56 m^3,
4. Cyanide bund volume 174 m^3, largest tank 40.2 m^3.
There are no process tanks without secondary containment.
The leach areas are linked to a holding tank equipped with a pump that returns the spillage to the leach tanks. The Residue and CIP bund areas are equipped with spindle pumps returning the spillage back to the Process. Drains will take any overflow of the bund area to the emergency spillage dam outside the fence, from where the spillage can be returned to the plant. The drains are both concrete channels with a pipeline for passing underneath the road.The cyanide facility is equipped with a bund, sump, and pump system, with the spillage currently being pumped to the leach only in the case of stormwater in the bund. If the spillage were high-strength cyanide, it would be pumped back to the storage tank. A pipeline to enable the pumping of anything in the cyanide storage bund back to the cyanide storage tank is in place.

Plant pipes are installed over bunds, concrete, and tar surfaces, linked to spillage containment dams. Reagent-strength cyanide dosing pipes from the cyanide storage dosing pumps are equipped with secondary containment channels that drain to the cyanide bund and the leach bunds, as appropriate. Any Tailings pipeline leaks (spillage) in the pipeline to Elikhulu that might occur are managed through a trench adjacent to the Tailings pipeline. The pipeline is inspected weekly by Kinross Plant Boilermakers. There are no areas where cyanide pipelines present a risk to surface water.
Tanks and pipelines are constructed of mild steel, and all flanges are welded by coded welders. The Tailings pipeline is made from HDPE (High-Density Polyethylene), which is compatible with cyanide and high pH conditions. The "new" pipelines were connected by Coded Welders and X-ray certified. Pipes are cladded to protect against cold 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.

X in full compliance with

The operation is
- ☐ in substantial compliance with **Standard of Practice 4.8**
- ☐ not in compliance with

Basis for this Finding/Deficiencies Identified:
No original Quality Control/Quality Assurance (QA/QC) cyanide facility documentation was available, as the plant is over 46 years old. As per a previous certification audit, a new cyanide facility was constructed and commissioned during February 2012. The Conloo Construction. QA/QC documentation was sighted on all the steelwork, including the tanks and pipes. It was confirmed that the drawings and documentation were still available. Historic fit-for-purpose and visual inspection records were available and sampled. Evidence of extensive refurbishment and repair work was sighted, as well as ongoing plans and funding for extending into 2025. A review of the activities and planned activities suggests that high-priority repairs and maintenance have been undertaken, and efforts continue to ensure the safety of all those working on the mine.
Sasol Producer Technical Inspections were undertaken over the three-year period (2023 and 2024, but not done in 2023 due to COVID-19) since the previous certifications were sighted and reviewed, and compliance scores were 92% and 97%, respectively.
Having studied engineering documentation, reviewed work and expenditure reports, and undertaken a site inspection, the auditor is of the opinion that considerable effort and funding have been injected into making the Processing Plant "fit-for-purpose". The work is not yet complete, but the specialist engineers have not indicated that the plant cannot continue to operate as per design. The plant's legally appointed Regulation 2.13.1 Engineer has conducted a risk assessment, and the ongoing repair plan was based on this assessment. The tailings facilities were previously audited when the TSF was part of the Kinross Plant. The 527,47 m Tailings pipeline between Kinross Plant and Elikhulu is

managed and maintained by Kinross Plant.

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

X in full compliance with

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

□ not in compliance with

Basis for this Finding/Deficiencies Identified:
The Evander Gold Plant has the following procedures, including water and surface water as well as cyanide-related sampling:

- *Procedure for Groundwater Monitoring*
  The procedure includes the sample positions and a map, the sampling frequency, and the sampling procedure. Also included are chain of custody procedures, and shipping instructions. Cyanide sample positions are also included in the ground- and surface-water map in the emergency procedure. Also included are chain of custody procedures, and shipping instructions.
- *Procedure for Surface Water Monitoring*
  Section 9. Parameters to be measured, in the procedure, only include free cyanide in surface waters. No licensed discharge of mine water to surface water is permitted (No-discharge licence).
- *Procedure for Preservation of Water Samples*
  Section 5.3, Immediate Preservation of Cyanide Sampling of Ground and Surface Water, describes pH adjustment, Storage, Sample Collection, Interferences, Holding Time, Sodium Hydroxide, and labelling. Also included are chain of custody procedures, and shipping instructions.
- *Cyanide Sampling Procedure*
  This procedure includes details on sample stabilisation and responsibilities for sampling when cyanide and WAD cyanide samples are taken.
- *Wildlife Mortality Reporting and Investigation Procedure*
  This procedure includes details of inspections and wildlife mortality reporting. Also included are detailed steps to be taken when finding wildlife mortalities.

The field sampling sheet was sighted in the appendices of the procedures. A completed field sheet was sighted dated 23-01-2025. It included remarks on sampling conditions (e.g., weather, livestock, wildlife activity, and anthropogenic (human) influences).
The current sampling and analytical procedures (Procedure for Ground Water Monitoring, Procedure for Surface Water Monitoring, Procedure for Preservation of Water Samples, and Cyanide Sampling Procedure) are maintained and reviewed by Ephraim Myeni, who holds a 4-year B.Sc. Honours degree in Environmental and Resource Studies.

The laboratory used to analyse samples has been part of the South African Bureau of Standards (SABS) Watercheck Scheme, involving 180 laboratories nationwide. All analytical methods used are SANS (South African National Standards) accredited. The Scheme is accredited to the requirements of ISO/IEC (International Standards Organization and the International Electrotechnical Commission) 17043 – "Conformity Assessment – General Requirements for the competency of proficiency testing providers".
WAD cyanide sampling is automated using WAD Cyanide analysers, backed up by manual titration.
Surface water is sampled monthly, and groundwater is sampled on a 6-monthly basis. WAD cyanide in the plant tailings is sampled using an online analyser at the tailings tank, and shiftly averages are reported. Monitoring is deemed to be at adequate frequencies to characterize the medium being monitored and to identify changes in a timely manner.

5. DECOMMISSIONING

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

Standard of Practice 5.1

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

	X in full compliance with
The operation is	□ in substantial compliance with **Standard of Practice 5.1**
	□ not in compliance with

Basis for this Finding/Deficiencies Identified:
The operation has a Cyanide Decommissioning procedure for decommissioning cyanide facilities at the cessation of operations. The procedure sufficiently addresses the cyanide decommissioning activities discussed in the Guidance for Use of the Mining Operations Verification Protocol, as applicable to its cyanide facilities.The procedure includes a decommissioning and closure schedule. The procedure is reviewed every 5 years in terms of the document control process, unless a revision is required earlier for other reasons, such as a change of facilities or a legislative change.

Standard of Practice 5.2

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

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

□ not in compliance with

Basis for this Finding/Deficiencies Identified:
The document, Evander Gold Mines (Pty) Ltd Review, Assessment and Adjustment of Financial Provision For 2024 (Closure) memorandum, EXM (Proprietary company name), dated June 2024, was sighted. The total reassessed closure cost for EGM as at June 2024 was calculated at ZAR 284.8 million. Previous versions of this document covering the period since the last certification were sighted.
An independent Cost Estimate by JJM Filtration, dated 19 November 2024, for third-party decommissioning of the cyanide facilities, totalling ZAR 529,975.50, was sighted. The above is based on the third-party implementation of the cyanide decommissioning. The scope included: -

- Test for explosive Gas & HP Clean tanks and equipment
- Flame-cut all lines and equipment into 1m lengths for safe disposal
- JJM Filtration will remove all Cyanide pipes and drip trays from Cyanide tanks.
- Medical Screening, Medical exit, Induction, or any additional training and contract announcements.

After due consideration of the closure documentation, it is deemed that there is sufficient provision in closure costing to cover cyanide-related decommissioning measures.
The financial decommissioning plan procedure requires an annual review and a review following significant operational changes, as well as an annual review by external consultants.
A Financial Guarantee from Centriq Insurance to the Regional Director: Mpumalanga Province, Dept of Mineral Resources, dated 1 August 2018, covering Closure costs, including cyanide decommissioning, for the guarantee amount totalling ZAR302,197,352.57. The amount is in excess of the calculated liabilities. It includes the money held in the previous Trust Fund, which was transferred from the Trust Fund to Centriq Insurance. This guarantee remains in force and is accepted by the South African Department of Mineral Resources. The amount of the guarantee is in excess of the maximum requirements of the decommissioning and decontamination of Evander Cyanide facilities.

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.

X in full compliance with

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

□ not in compliance with

Basis for this Finding/Deficiencies Identified:
The operation's cyanide procedure index was sighted, and the following procedures and documents were sampled and reviewed: -

- Working in Confined Space and Cyanide Storage Vessels, KIN-PROC 055, rev 1, dated 6 November 2023
- Obtaining and Compiling a Clearance Certificate - Normal Work, KIN-PROC-331, rev 1, dated 23 October 2023.
- Entering a confined space: Sumps or Tunnels, KIN-PROC-008, rev 1, dated 3 January 2023
- Liquid Cyanide Offloading, KIN-PROC-126, rev 3, dated 12 March 2025.
- Clearance Certificate for Vessel Entry, KIN-PROC-320, rev 1, dated 19 October 2023.
- Cyanide Vessel Decontamination, KIN-PROC-006, rev 1, dated 30 August 2023
- Decontamination before maintenance is included in the procedure to change a cyanide pump, KIN-PROC-004, rev 1, dated 28 February 2024.

Procedures are reviewed as part of the document control system.
It was confirmed in the review of the sampled procedures above that the procedures require pre-work inspections and PPE (Personal Protective Equipment) to be used. Also reviewed was the procedure: Cyanide PPE Control, Care and Examination, KIN-PROC 005, rev 1, dated 31 August 2023. The high-risk cyanide storage area displays PPE requirements. This is also specified in the procedure, Liquid Cyanide Offloading, KIN-PROC-126. Training programs include the requirement for the wearing of appropriate PPE when working with cyanide or on cyanide facilities.
There are several ways in which the operation solicits and actively considers worker input in developing and evaluating health and safety procedures. Plant personnel are involved in issue-based risk assessments. Daily toolbox talks provide the opportunity for workers to give input regarding health and safety procedures. It was confirmed during the interviews that daily safety and health meetings are held, and these include a safety topic, and feedback from the participants is addressed. A toolbox talk dated 19-09-2024 was sighted with cyanide as the main topic, referring to PPE, colour, and what to do in emergencies. The talk on 04-03-2024 focused on cyanide, discussing cyanide alarms and what to do with a patient. There is a Weekly safety meeting, and the record of an interactive Cyanide Quiz for attendees on 6 March 2025 (53 attendees) was sighted.

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

X in full compliance with

The operation is □ in substantial compliance with **Standard of Practice 6.2**

□ not in compliance with

Basis for this Finding/Deficiencies Identified:
The procedure, "Response to low pH level, states, "…Discharge points of cyanide must always enter the process stream at a point where the pH is maintained above 10.2 and which is well ventilated at all times. As (9.8) is very dangerous. This is to prevent the decomposition of cyanide into hydrogen cyanide gas, which is deadly. Always maintain pH between 10.7 – 11…"
Signage was sighted in high-risk areas requiring the use of appropriate PPE. Areas identified are those where fixed monitors are located, i.e., the Cyanide bund, the Cyanide dosing point (ROM CIL tank No. 1), the Cyanide dosing point (SS CIL tank No. 2), and the CLR (Cyanide Leach Reactor) reactor top.
The HCN gas monitors' 1st alarm is set at 4.7 ppm, and the second alarm is set at 10 ppm. The area is evacuated at 4.7 ppm, investigated, and returned to work if values are less than 4.7 ppm.
There are seven portable HCN gas personal monitors used on the plant. Four fixed HCN gas monitor units: one at the cyanide storage area, one at the ROM tank no 1, one at the Surface Leach tank 1, and one inside the Smelthouse on the Osmiridium reactor.
The Procedure, Monitoring of and Calibrating Fixed & Portable Gas Monitors, identifies risk areas where gas monitors are located and are required under section 8, Placement of Monitors. The areas identified are those where fixed monitors need to be located are the cyanide bund, Cyanide dosing point (ROM CIL tank No. 1), Cyanide dosing point (SS CIL tank No. 2), and the CLR reactor top. In the procedure under Section 9, HCN gas Monitor Alarm Setpoint, it requires first alarms to be set at 4.7 ppm and second alarms at 10 ppm. The requirement is that the area must be evacuated at an alarm of 4.7 ppm. The senior person must investigate the source of the gas, and there is a return to work when the gas levels fall below 4.7 ppm.
The manufacturer, Dräger, requires calibration and maintenance every 6 months. The procedure, Monitoring of and Calibrating Fixed & Portable Gas Monitors, includes the requirement for 6-monthly calibrations, as per the manufacturer's recommendations. Fixed monitors are also calibrated every 6 months. However, the plant additionally requires portable monitors to be calibrated every three months. The procedure requires the inspection of personal gas monitors to be undertaken through the DMS system every second month, and a job card is created through the DMS system for the fixed monitors to be inspected every fifth month. Portable gas monitor calibration records were sampled in 2022, 2023, 2024, and 2025. Fixed gas monitor calibration records were sampled for 2022, 2023, and 2024.
Signage at the cyanide store and offloading area was observed to be very thorough and clear, including cyanide warning signs, PPE requirements, no smoking or open flames, cyanide first aid treatment, and no eating or drinking. The large SDS (Safety Data Sheet) sign at the cyanide storage includes the reddish colour of the cyanide solution. The general signage on the CIL and the rest of the plant was confirmed to be in place and effective during the site inspection. Sasol is a certified liquid sodium cyanide producer that delivers liquid sodium cyanide to ICMI signatories, which is dyed red, using Carmoisine food colouring. The Sasol Safety Data Sheet (SDS): - Sodium Cyanide Solution, Version 1, Revision Date 09-09-2022, issued to EGM, includes in Section 9.

Physical and chemical properties Colour: Light to dark red. The working language of the Plant is English.
During the site inspection, it was verified that safety showers equipped with eye washes and powder fire extinguishers are located strategically in the plant. The pressure is differentiated between the shower deluge high up and the lower-pressure eye wash diffuser lower down. Inspection records book for safety showers in the cyanide facility were sampled for 2022 and 2023. DMS inspection records covering maintenance PM inspections on cyanide facility and low-strength cyanide facility showers in the Leach and Elution were reviewed from 2023 to 2025. The fire extinguishers' inspection records book was sighted, and Flamtec Fire Equipment Services' (specialist contractor) annual inspection on-site includes monthly visual inspections and annual pressure tests. Faulty units are repaired, if possible, or replaced. Flamtec records for 2023, 2024, and 2025 were sighted and reviewed.
It was verified during the site inspection that the reagent strength pipeline feed to the dosing point is colour-coded and labelled with the flow direction indicated. The Residue slurry line to Elikhulu is colour-coded, and the flow direction is indicated. The residue slurry pipeline is within the secure plant area but is clearly marked “Poisonous” with the Skull and Cross Bones and a direction flow arrow. The 527,47 m Tailings pipeline between Kinross Plant and Elikhulu is managed by Kinross Plant and forms part of the Kinross Operational Inspection procedure. Slime pipelines are colour-coded black. Pipe colour coding forms part of the training induction.
No cyanide-related incidents or accidents have occurred since the recertification audit in 2022. However, an Accident investigation report in terms of the Mine Health & Safety (MHS) Act section 11.5: Lost Time Injury: - fall from heights at the Mills Knelson Vibrating Screens, was sighted and reviewed. The report included observations during *in loco* inspection, photos, sequence of events, findings, potential human effects, and contributing factors.

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

	X in full compliance with
The operation is	□ in substantial compliance with **Standard of Practice 6.3**
	□ not in compliance with

Basis for this Finding/Deficiencies Identified:
The plant is equipped with an emergency room containing medical oxygen, face masks, SCBA (Self-Contained Breathing Apparatus) sets, a manual resuscitator, stretcher, PPE, Cyano-Kit cyanide antidote stored in a fridge, and access to potable water close by. An emergency cyanide alarm was sighted at the cyanide storage area. Radios and cell phones are used for normal and emergency communication. An additional Cyano-Kit cyanide antidote is placed at the Osmiridium reactor in a fridge.

Cyano-Kit cyanide antidote kits are stored in fridges. It was confirmed that the kits are all current and stored in fridges during the site inspections. Antidote replacement is done, using the daily checklist expiry date – current antidotes expire on 7 November 2026. The Dynamics ordering system is used to acquire replacements. Cyanide first aid inspections are done initially by Shift Supervisors – sampled PM53387 dated 04-12-2023 by Peter Slinger (Engineer) inspecting first aid kits in the engineering workshop, and PM55079 dated 02-01-2024 by Greg Vilbro (Engineering Supervisor), doing the monthly first aid kit inspection by a supervisor in the engineering workshop. Latterly, inspections are conducted by the Chemical Handler daily. The inspection records from the inspection books were sighted and reviewed. The Safety Officer also inspects the sealed first aid kits monthly.

The Evander Gold Mining (Pty) Limited Emergency Response Plan (ERP) Procedure is a written emergency response plan/procedure to respond to cyanide exposures. All the treatment shift staff are trained as cyanide emergency responders, including in the use of emergency equipment, as is available in the emergency room. The Plan also details the necessary response to cyanide exposure through ingestion, inhalation, and absorption through the skin and eyes. Only qualified paramedics and medical practitioners, including ER 24 Medical Practitioners, are authorised to administer the cyanide antidote. Emergency Responders only administer medical oxygen. A cyanide emergency room is available on the plant, equipped with medical oxygen, face masks, SCBA sets, a stretcher, PPE, Cyano-Kit cyanide antidote stored in a fridge, a manual resuscitator, and access to potable water close by. Cyanide emergency cases are transported by ER24 ambulances to the Highveld Mediclinic in Trichardt. The procedure, Callout Procedure for Paramedics during Emergencies, includes the calling of a paramedic, transport, and emergency entrance and egress through the security gates.

Full cycle drills are held annually from the Plant to Highveld Mediclinic. ER24 provides the ambulance service on contract. No Community members are part of, or involved in, the ERP. The Mine Clinic Head, Dr Maiphetlho, reports that there is a good working relationship with the Highveld Mediclinic Emergency Room head, Dr Cole. Highveld Mediclinic also works closely with the Sasol Cyanide Production facility. Dr Maiphetlho is satisfied that the Highveld Mediclinic has the necessary medical resources to treat cyanide patients. It has been agreed that the mine will send supplies of antidote (Cyano Kits) with any patients that go to the MediClinic, along with treatment notes to date.

7. EMERGENCY RESPONSE

Protect communities and the environment through the development of emergency response strategies and capabilities.

Standard of Practice 7.1

Prepare detailed emergency response plans for potential cyanide releases.

X in full compliance with

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

□ not in compliance with

Basis for this Finding/Deficiencies Identified:
The Evander Gold Mining (Pty) Limited Emergency Response Plan (ERP) Procedure is a written emergency response plan/procedure to respond to cyanide exposures. The Emergency Response Plan has considered emergency response scenarios such as: - Hydrogen Cyanide Gas Generation/ Exposure, – Hazardous Chemical Spills, Liquid Cyanide Spillage, Cyanide Exposure due to Explosion, Plant or Vehicle Fires, and Surface power failure. Responses to these scenarios include the use of appropriate cyanide procedures.
The Plan includes an evacuation procedure for on-site staff and surrounding communities, the use of cyanide antidotes and first aid measures for cyanide exposure, and Liquid Spillage control and containment of releases.

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

X in full compliance with

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

□ not in compliance with

Basis for this Finding/Deficiencies Identified:
The workforce is involved with the ERP via emergency drills and safety meetings, and gives feedback on issues relating to response planning. The operation is a member of the quarterly Waterval Forum, which is a water catchment management forum for engagement between stakeholders on water and water pollution matters. Subsequent to the COVID-19 Pandemic, communities have not been interested in discussing any issues with the mine, other than job creation or funding of community commercial activities. It has been very difficult for the mine to re-establish a two-way dialogue with stakeholders after the social and economic pressures of the pandemic, which still exist. Efforts are continuing to find common ground to discuss SHE issues and cyanide awareness.
Full cycle drills are held from the plant to the Highveld Mediclinic, which keeps the Mediclinic updated on ERP matters. ER24 provides the ambulance service on contract and is updated on the ERP through drills. The Mine Clinic Head, Dr Maiphetlho, reports that there is a good working relationship with Highveld Mediclinic Emergency Room head, Dr Cole. Highveld Mediclinic also works closely with the Sasol Cyanide Production facility. Dr Maiphetlho is satisfied that the Highveld Mediclinic has the necessary medical resources to treat cyanide patients. It has been agreed that the mine will send supplies of antidote (Cyano Kits) with any patients that go to the MediClinic, along with treatment notes to date. The community is not involved with the EGM Emergency Response Plan.

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

X in full compliance with

The operation is □ in substantial compliance with **Standard of Practice 7.3**

□ not in compliance with

Basis for this Finding/Deficiencies Identified:
Section 39 of the ERP designates the duties and roles of responders. The standby Manager would have the authority to commit the resources necessary to implement the Plan. In section 9 of the ERP, the Met plant operations control centre specifies the authority of the control room operator, who is the response coordinator. All staff are trained to handle cyanide emergencies as first responders, and the ERP defines the roles of the 1st, 2nd, 3rd, and 4th responders, as well as the control room operator. The Cyanide Training matrix defines required training for emergency responders. The callout procedure depends on the type of emergency. Each emergency procedure scenario includes a specific set of callouts and the order in which they should be called out. The Emergency contact procedure includes positions and emergency contact numbers. There is an emergency equipment inventory listing of cyanide emergency equipment in the ERP. The Cyanide PPE control care and examination procedure includes control, care, usage, and inspection of PPE. Cyanide emergency response equipment inspections are conducted daily by the chemical handler, and over-inspections are carried out by the Engineer, Safety Officer, and the Plant Manager. Inspection records were sampled over the three-year period since the last certification audit. The ERP's Emergency Procedures Quick Reference Guides cover Mediclinic and Ambulance procedures. The procedure, Call out Procedure for Paramedic During Emergencies, describes the role of the Paramedic and Safety Officer. The only external entities with roles and responsibilities identified in the Emergency Response Plan are the Highveld Mediclinic and the ambulance service, and they are kept up to date through their participation in drills.

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

X in full compliance with

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

□ not in compliance with

Basis for this Finding/Deficiencies Identified:
Section 39 of the ERP includes notification of management, regulatory agencies, external response providers, and medical facilities, and communication with the media and affected communities. Section 9, Met plant operations control centre, specifies the authority of the control room operator, who is the response coordinator. The Control Centre will contact the relevant people, including the medical contacts, as per the emergency procedure, during normal working hours or as per the standby list after hours. Employees will not disclose any information to the press or public. Only the Human Resources Manager, in consultation with Senior Management, may release information. The operation has a procedure for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. No incidents have needed to be reported.

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

X in full compliance with

The operation is
□ in substantial compliance with **Standard of Practice 7.5**

□ not in compliance with

Basis for this Finding/Deficiencies Identified:
In the ERP, Section 37 Emergency Procedures, Liquid Cyanide Spillage, it includes remediation of cyanide solution, flows into drains & down the road, and contaminating the area or overflowing into the dams' area.
Section 46.1 Emergency Response (and part of Section 45 Environmental Procedures) indicates: - notify the Environmental Officer, contain spillage, treat spill, and do not add chemicals if they may enter still or running water. Initiate monitoring. The procedure, use of ferrous sulphate, describes the use and handling of ferrous sulphate as a neutralising agent and to decontaminate articles of clothing.
Section 47.8.1 Soil Sampling, requires the sampling of unpolluted soil contaminated by cyanide-bearing solution using the defined methodology: -
- "…If the spill has already occurred, then the addition of chemicals could result in additional environmental impacts and are generally not effective in reducing downstream cyanide levels. Specifically, chlorine or hypochlorite reagents are not recommended for direct treatment of cyanide spills in flowing surface water, since these compounds are toxic…"
In the ERP, Section 6.3, Decontamination of Cyanide Contaminated Media, Pipes and Pumps, it describes decontamination by soaking in ferrous sulphate solution for 8-12 hours. Minor, low quantity spill cleanup debris is disposed of back into the Process.

Larger quantities of clean-up debris would, after risk assessment and liaison with Elikhulu, be disposed of in the TSF.

There are no nearby communities that could be affected present in the Plant zone of influence, or make use of boreholes for livestock watering or human consumption. Potable water is supplied and reticulated to communities by the Govan Mbeki Municipality.
The Cyanide Sampling Procedure includes sampling procedures of groundwater, surface water, and soil sampling under normal and emergency conditions. There is no defined endpoint of the remediation, but a combination of ferrous sulphate as an indicator and testing to below 0.5ppm (limit of cyanide facility definition) would probably be used.

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

X in full compliance with

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

□ not in compliance with

Basis for this Finding/Deficiencies Identified:
The ERP's normal cycle of document review is 5 years, unless there is a reason to review in a shorter period, such as a change of facilities, legislative change, or recommendations from cyanide drill results.
Two types of cyanide drills are conducted:
- from the incident site to the gate, and
- From the airlock to the MediClinic

Cyanide Drills undertaken

- An unannounced cyanide mandown mock drill in the plant next to the cyanide cubicle was undertaken on 1 August 2024. The drill was videotaped and was a full cycle drill to the Highveld Mediclinic Hospital. The post-mortem report included improvements and issues (the ambulance got lost and went to the Elikhulu Plant first instead of the Kinross plant). The corrective action was to add a new signboard at the 4-way stop near the plant and issue the hospital with the appropriate GPS coordinates. Photos were taken during the drill, and the attendance register was sighted. There had been internal mock drills and extra training beforehand, which improved the team's reactions during the full-cycle drill.
- A cyanide mandown internal plant mock drill for gassing was done on 30 August 2023 in the plant next to the cyanide cubicle. The learning points were inadequate PPE and problems with two-way radio communication. Additional PPE was acquired, and additional radios were obtained in the plant.
- An ingestion of cyanide mock drill was carried out on 18 September 2022 in the plant next to the cyanide cubicle. The main issue was that employees were unsure of what to do. Corrective action involved extra training on dealing with an ingestion case.

- A Liquid cyanide Mock Spill Drill was carried out at the Met Plant on 14 May 2024 to evaluate the effectiveness of liquid cyanide spill containment and cleanup, the use of the ferrous sulphate treatment chemical, and test and refresh ERP procedures. Response to the drill was good.

In the ERP, section 6.5 Investigations and Follow-Up, it states,
"…6.5.1 Emergency drills
[The] responsible HOD *[Head of Department]* must, using a team approach, conduct an investigation to determine the cause of a deviation or shortfall during an emergency drill. Existing standard procedure, training manuals, and control measures must be revised on a team approach and amended if necessary to address the deviation or shortfall.
6.5.2. Emergency Events
The Emergency Procedures and related standard procedure, training manuals, and control measures must be reviewed annually, and after a major event or changes in legislation, on a team approach and amended if necessary to address the deviations or shortfalls identified…"
Reviews have been carried out, but revising procedures has not been necessary.

8. TRAINING

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

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

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

Basis for this Finding/Deficiencies Identified:
All plant personnel inside the plant fence are trained during induction on basic cyanide awareness and Cyanide first aid. The cyanide training program is available on DVD. The training includes: - cyanide materials present at the operation, the health effects of cyanide, and the symptoms of cyanide exposure. Assessments are carried out, and the pass mark is 80%. Assessments were sampled and confirmed to meet the requirements. The completed induction training matrix included EGM plant employees and Security. The operation is using e-learning as a part of hazard training.
Refresher training is done annually on return from leave. A Firefly system is in place, flagging the remaining validity time (14 days) of induction and medicals. The system will block the employee's access card if 0 days are left. This is updated in the training matrix. A routing form is used to ensure new employees receive cyanide training, and returning from leave employees are blocked by a card control system from entering the plant when they have not completed the cyanide training/refresher, and induction. Cyanide training

records are retained for 40 years on the plant, after which the records are sent to the central archive. Electronic records are also kept.

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

X in full compliance with

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

Basis for this Finding/Deficiencies Identified:
The Evander Kinross Plant Training matrix, indicating training requirements and elements for all staff, populated with names, was sighted. The training requirements include all normal production tasks and include the appropriate procedures.
Training is done by EGM training officers on-site. Tshepo Mosiane is a Trained Assessor, has undertaken train-the-trainer training, has a Diploma in Safety Management, is a trained Moderator, has a National Certificate in Mineral Processing, and a Diploma in Occupationally Directed Education and Training Practice. Bontle Mengwai is a Trained Facilitator, a Trained Assessor, and is in the process of obtaining the qualification of a National Certificate in Mineral Processing. Simon Make is trained as an Assessor, has a National Certificate of Mineral Processing, has undertaken train-the-trainer training, and has 46 years of experience in a Gold Plant.
All employees are trained before being allowed to work in a cyanide section. The Firefly clock card system is used to control access to the plant. The system will block the employee's access card if the employee has not undertaken the appropriate training. Contractors are trained and inducted before being allowed on the plant. The clock card system is also used to control contractor access to the plant. Assessments are used to test knowledge and competency. Examples of completed assessments were sighted.
A PTO (Planned Task Observation) system is in place, and any poor performers resulting from PTOs will be given refresher training. Refresher training can be given if risks are identified and employees need to be retrained in specific tasks. Supervisors and Training Officers conduct PTOs. The target is two per week. The effectiveness of cyanide training is evaluated using written tests and PTOs. The Training Officers conduct additional PTOs and train and coach staff in areas where the PTO identifies a weakness. Several PTOs conducted in 2022 and 2023 were sampled and reviewed.
Cyanide training records include the names of the employee and the trainer, the date of training, the topics covered, and how the employees demonstrated their understanding of the training materials. The training records are retained for 40 years on the plant, after which the records are sent to the central archive. Electronic records are also kept.

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

X in full compliance with

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

 not in compliance with

Basis for this Finding/Deficiencies Identified:
All staff are trained as cyanide emergency responders, which was confirmed in the training matrix. The training includes response procedures both for cyanide releases and cyanide exposures, including decontamination and first aid procedures. A cyanide emergency team consisting of four to five members is in place on each of the four shifts. The plant uses the 1st, 2nd, 3rd, and 4th responder system, as per the procedure, Conducting Cyanide Drills. Plant Trainers conduct Sodium Cyanide Awareness courses, which include First Aid.
External local responders, such as local fire brigades, are not normally involved in emergency response for Evander. However, Evander is represented in the Waterval Forum, a forum convened by the government to liaise on water catchment affairs and keep members informed about each other's activities. Evander gets the opportunity, periodically, to talk about cyanide at the Forum meetings. Sighted meeting minutes of a Zoom meeting held on 22 August 2023, where Evander reported on cyanide management in place at the site. Full cycle cyanide drills are held from the Plant to Highveld Mediclinic Hospital annually as a training tool. All staff receive refresher training annually. An Attendance Register for staff training at Mediclinic Highveld Hospital on donning Cyanide PPE when treating a patient suspected of cyanide exposure on 10-10-2024 was sighted.
Cyanide training records are retained for 40 years on the plant, after which the records are sent to the central archive. Electronic records are also kept.

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

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

X in full compliance with

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

 not in compliance with

Basis for this Finding/Deficiencies Identified:
The quarterly Waterval Forum is a water catchment management forum for stakeholder engagement. Evander Gold Mine and Elikhulu Plant are both represented, and they periodically report on water matters in their operations. Cyanide was mentioned in the minutes of 22 August 2023. The Forum includes political parties, municipalities, surrounding Mines, the National Department of Water and Sanitation, Rand Water, and Community Leaders.
The Govan Mbeki Community Awareness and Emergency Response (CAER) Committee is a forum for discussing emergency scenarios. Meetings were suspended due to the COVID-19 pandemic but have recommenced. Significant cyanide issues will be reported at this forum. A Cyanide Presentation given in English to the monthly Govan Mbeki Community Awareness and Emergency Response (CAER) Committee meeting held on 15th January 2025 was sighted.
Subsequent to the COVID-19 Pandemic, communities have not been interested in discussing any issues with the mine, other than job creation or funding of community commercial activities. It has been very difficult for the mine to re-establish a two-way dialogue with stakeholders after the social and economic pressures of the pandemic, which still exist. Efforts are continuing to find common ground to discuss SHE issues and cyanide awareness.

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

	X in full compliance with
The operation is	□ in substantial compliance with **Standard of Practice 9.2**
	□ not in compliance with

Basis for this Finding/Deficiencies Identified:
The nature of the communities is that they prefer to be shown information and equipment rather than given pamphlets or other documents. Thus, there are no formal, written documents, but copies of PowerPoint presentations are made available on request. Presentations are given in English or Zulu. A Cyanide Presentation given in English to the monthly Govan Mbeki Community Awareness and Emergency Response (CAER) Committee meeting held on 15th January 2025 was sighted. Most stakeholders in the area are literate. However, during presentations, staff can communicate verbally in any of South Africa's 11 official languages.
Any communication on injuries, fatalities, or significant environmental incidents will be handled in accordance with the Evander Gold Mining (Pty) Limited Emergency Response Plan Procedure, Section 5. The Evander HR Manager will communicate with the Corporate Structure before any information is released via a Media Briefing.

Annual reporting on fatalities and significant environmental incidents is done via the Pan African Resources Integrated Annual Report. The Group SHEQ Manager, Mandla Ndlozi, reports that the companies within the Pan African Resources Group have not yet experienced cyanide incidents or accidents, so it is difficult to predict how the company would respond in terms of public reporting. However, in the spirit of complying with the Cyanide Code reporting requirements, the company would ensure that the incident(s) are fully investigated and ensure that the full details (type, context, location, name of operation) thereof are included in the Company's subsequent Sustainability or Annual Reports aligned with the company's reporting framework and regulatory obligations, which are accessible to the public on the company's website - (www.panafricanresources.com) Tanker Services, the ICMI-certified transporter, is responsible for incidents and incident reporting off the mine property.