



**International Cyanide Management Code
Mining Operations Recertification Audit
Evolution Mining (Cowal) Pty Ltd
Cowal Gold Mine**

**Corrective Action Plan
Completion Report**

16 December 2025



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1. Audit Details

Name of Mine: Cowal Gold Mine (CGM)
Name of Mine Owner: Evolution Mining (Cowal) Pty Ltd
Name of Mine Operator: Evolution Mining (Cowal) Pty Ltd
Name of Responsible Manager: Joe Mammen, General Manager
Address: Cowal Gold Mine, PO Box 210,
West Wyalong 2671
State/Province: New South Wales
Country: Australia
Telephone: +61 2 6875 4700
Fax: None
Email: joe.mammen@evolutionmining.com
Audit Company: Veritas Metallica Pty Ltd
Audit Team Leader: Tom Gibbons
Email: Tom_G@westnet.com.au
Date(s) of Audit: 11 – 15 November 2024 Inclusive
Audit Finding: In Substantial Compliance
Audit Posting Date: 09 July 2025

I attest that that the Operation (Cowal Gold Mine) has fully implemented the Corrective Action Plan posted on the International Cyanide Management Code website on 09 July 2025.

This report contains a summary of the evidence that resulted in the conclusion of full compliance for each deficiency that was noted in the Summary Audit Report and was included in the Corrective Action Plan.

Cowal Gold Mine

Name of Mine

Signature of Lead Auditor

16 December 2025

Date



2. Introduction

The development and implementation of a Corrective Action Plan is required as an integral part of any audit for Cyanide Code certification of a mining operation, where the auditor, based on the audit findings, determines that the operation is in substantial compliance and is certified conditionally, or is in non-compliance and cannot be certified.

The full implementation of the Corrective Action Plan and adequate notification to the International Cyanide Management Institute (ICMI) must be completed within one year of the posting on the Cyanide Code website of the Summary Audit Report of an operation found in Substantial Compliance.

In November 2024, CGM underwent its seventh re-certification audit and was found to be in Substantial Compliance for nine standards of practice (3.2, 4.1, 4.3, 4.5, 4.7, 7.1, 7.4, 7.6, and 9.2) following finalization of the assessment of all relevant data and inspections on 04 March 2025.

The deficiencies, corrective actions, proposed completion date, and evidence verified to attain Full Compliance are provided in the table below. The verification process included a Lead Auditor field inspection at Cowal Gold Mine on 10 December 2025.



3. Corrective Action Plan Details

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.

3.2.3: Has the operation developed and implemented plans or procedures to prevent exposures and releases during cyanide unloading and mixing activities such as:

a: Operation and maintenance of all hoses, valves and couplings for unloading liquid cyanide and mixing solid or liquid cyanide?

e: Providing for safe unloading of liquid cyanide and manual mixing of solid cyanide by requiring appropriate personal protective equipment and having a second individual observe from a safe area, or remote observation by video?

Deficiency	Corrective Actions	Evidence Required	Evidence Verified	Compliance Status
During a field inspection, the Auditor observed deviations from the Cyanide Unloading, Mixing and Storage Procedure, related to correct use of personnel protective equipment, operation of drain valves, location of emergency cut-off valves, communication during cyanide spills, and Spotter duties.	<ul style="list-style-type: none"> Implement recommended corrective actions from corresponding Incident Report. Provide training records for Cyanide Delivery Drivers confirming that they are adequately trained and competent on use of personnel protective equipment and operation of drain valves during cyanide unloading and mixing. Ensure Control Room Process Technicians are aware of requirement to respond to fixed hydrogen cyanide monitor 	<ul style="list-style-type: none"> Close-out Report from Incident No 846644 confirming all corrective actions have been implemented. Summary report demonstrating that Cyanide Delivery Drivers confirming are adequately trained and competent on use of personnel protective equipment and operation of drain valves during cyanide unloading and mixing. 	<ul style="list-style-type: none"> Note: Cowal Gold Mine documentation sometimes contains the acronym CGO, which represents Cowal Gold Operation. CGM Corrective Action Plan Post Audit Tracker 2025. 318002344-001 Cowal CN Code Rectification Actions Review Tracker 2025. Memorandum: Investigation and actions out of Cyanide PPE incident INX#846644, 28 May 2025, confirming corrective actions have been implemented. 	In Full Compliance



	<p>alarms during cyanide unloading.</p> <ul style="list-style-type: none"> • Provide six months of cyanide unloading records confirming that procedures are being correctly followed and further spills avoided. 	<ul style="list-style-type: none"> • Minutes of Safety Meeting or Pre-Start Meetings demonstrating that Process Technician monitoring within the Control Room are aware of requirement to respond to fixed hydrogen cyanide monitor alarms during cyanide unloading. • Cyanide unloading records demonstrating that cyanide unloading procedures are being correctly followed and further spills avoided. 	<ul style="list-style-type: none"> • Delivery Driver Cyanide Training Certificates 2024 and 2025. • Letter from Cyanide Producer and Supply Chain Manager Orica Australia 18 Nov 2025 confirming training records for cyanide delivery drivers. • Processing Operations Safety Meeting Minutes 29 July 2025, discussing response to fixed hydrogen cyanide monitor alarms during cyanide unloading. • Cyanide delivery and unloading records for the period January 2025 – November 2025. 	
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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.

4.1.4: Does the operation have a procedure to identify when changes in a site's processes or operating practices may increase the potential for the release of cyanide and to incorporate the necessary release prevention measures?

Deficiency	Corrective Actions	Evidence Required	Evidence Verified	Compliance Status
No Management of Change Workflow, as it relates to cyanide and the Cyanide Code, was available for the Paste Plant Project.	<ul style="list-style-type: none"> • Evaluate existing Paste Plant Design and Operation against the Standards of Practice of the Mining Operations Verification Protocol. 	<ul style="list-style-type: none"> • Gap Analysis Report assessing the Paste Plant against the Standards of Practice of the Mining Operations Verification Protocol. 	<ul style="list-style-type: none"> • CGM Corrective Action Plan Post Audit Tracker 2025. • 318002344-001 Cowal CN Code Rectification Actions Review Tracker 2025. 	In Full Compliance



	<ul style="list-style-type: none"> • Develop Action List from Paste Plant Evaluation. • Implement Paste Plant Evaluation Action List. 	<ul style="list-style-type: none"> • Completion Report demonstrating implementation of all action items arising from the Paste Plant Gap Analysis. 	<ul style="list-style-type: none"> • Paste Plant Cyanide Code Gap Analysis Review, Rambol, July 2025. • Evolution Cowal Operation: Paste Plant ICMC Compliance Corrective Action Review, Rambol, December 2025. • Auditor Site Inspection 10 December 2025. 	
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Standard of Practice 4.3: Implement a comprehensive water management program to protect against unintentional releases.
 4.3.1: Has the operation developed a comprehensive, probabilistic water balance?

Deficiency	Corrective Actions	Evidence Required	Evidence Verified	Compliance Status
Records for the Probabilistic Water Balance Model Run and Reports are incomplete.	<ul style="list-style-type: none"> • Revise Procedures and Systems to ensure that periodic model run requirement is flagged. • Provide three consequent quarterly model runs commencing Q1 2025. 	<ul style="list-style-type: none"> • Revised procedures and system information demonstrating that a mechanism is in place to trigger the requirement to complete a Probabilistic Water Balance Run and corresponding summary report on a quarterly basis. • Probabilistic Water Balance Quarterly Summary reports for Q1, Q2, Q3 2025. 	<ul style="list-style-type: none"> • CGM Corrective Action Plan Post Audit Tracker 2025. • 318002344-001 Cowal CN Code Rectification Actions Review Tracker 2025. • Pronto PM Task 202911 – 3 monthly Site Water Balance Run Trigger. • Pronto PM Task 202911 Sign-off Report 23 August 2025. • Site Water Balance Summary Reports – January 2025, February 2025, May 2025, August 2025. 	In Full Compliance



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

4.5.2: Does the operation monitor for cyanide in surface water downgradient of the site and can the operation demonstrate that direct discharges to surface water do not cause the concentration of free cyanide in the receiving water to exceed 0.022 mg/l downstream of any established mixing zone?

Deficiency	Corrective Actions	Evidence Required	Evidence Verified	Compliance Status
<p>CGM has not consistently assayed for cyanide in surface water (Lake Cowal) downgradient of the Operation during the audit period.</p>	<ul style="list-style-type: none"> • Revise the Monitoring Procedures to include quarterly weak-acid dissociable (WAD) cyanide monitoring at the following monitoring locations: <ul style="list-style-type: none"> ➤ 14 (P1) ➤ 15 (P2) ➤ 16 (P3) ➤ 17 (B1) ➤ 18 (B6) • Provide monitoring results demonstrating that cyanide monitoring in Lake Cowal is occurring. 	<ul style="list-style-type: none"> • Revised Monitoring Procedures demonstrating requirement of WAD cyanide monitoring at nominated monitoring locations. • Published Environmental Monitoring Reports for Q1, Q2, Q3 2025 demonstrating WAD cyanide monitoring at nominated locations. 	<ul style="list-style-type: none"> • CGM Corrective Action Plan Post Audit Tracker 2025. • 318002344-001 Cowal CN Code Rectification Actions Review Tracker 2025. • Verified updated procedure – ‘CGO Safe Work Instruction Lake Water Monitoring Procedure for WAD & Total Cyanide’ has requirement for quarterly WAD CN sampling. • Revised procedure sighted; WAD CN results and reporting sighted; CGO Safe Work Instruction Lake Water Monitoring Procedure for WAD & Total Cyanide, July 2025. 	<p>In Full Compliance</p>



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

4.7.1: Are spill prevention or containment measures provided for all cyanide unloading, storage, mixing and process solution tanks?

Deficiency	Corrective Actions	Evidence Required	Evidence Verified	Compliance Status
<p>During a field inspection of the Flotation Tailings Leach (FTL) circuit on 12 November 2024, a significant number of leak detection ports, also known as tell tales, were found to be blocked.</p>	<ul style="list-style-type: none"> Following cleaning, valves, caps or similar to be fitted on ports to avoid blockage reoccurrence and allow periodic inspection. 	<ul style="list-style-type: none"> Photographic evidence demonstrating leak detection ports have been fitted with valves. 	<ul style="list-style-type: none"> CGM Corrective Action Plan Post Audit Tracker 2025. 318002344-001 Cowal CN Code Rectification Actions Review Tracker 2025. Monthly Worker Orders and Reports for Monthly Leach and Reagents Inspections (including Tank Leak Detection Ports) - 3319122, 3324672, 3329985, 3331484, 3336683, 3339178, 3342425 CGO Change Management Form - Install check valve in the leak detection ports in Conc leach and FTL Tanks. December 2025 Work order 3347475 – Installation of Check Valves in Leak Detection Ports in FLT Tanks. Work Order 3361776 – Installation of Check Valves in Leak Detection Ports of Conc Leach Tanks. 	<p>In Full Compliance</p>



			<ul style="list-style-type: none"> • Auditor Site Inspection 10 December 2025. • Email: Photographic evidence confirming installation of check valves to all scheduled FLT and Conc Leach Tank Leak Detection Ports, M Selva - CGM, 14 December 2025 	
<p>Monthly inspection sheets for the FTL circuit did not identify that the ports were blocked.</p>	<ul style="list-style-type: none"> • Communicate importance of leak detection inspections to Process Technicians. • Provide Leak Detection Inspection records showing appropriate assessment of leak detection reports. 	<ul style="list-style-type: none"> • Minutes of Safety Meeting or Pre-Start Meetings demonstrating that Process Technicians are aware of requirement to check leak detection ports during inspections, and note if the port appears blocked or damaged. • Provide records for 6 consecutive monthly area inspections since ports unblocked demonstrating appropriate completion of leak detection inspections form. 	<ul style="list-style-type: none"> • CGM Corrective Action Plan Post Audit Tracker 2025. • 318002344-001 Cowal CN Code Rectification Actions Review Tracker 2025. • Pronto PM Task 0340002 – Monthly Leach and Reagents Inspection Site Trigger. • Monthly Worker Orders and Reports for Monthly Leach and Reagents Inspections ((including Tank Leak Detection Ports) - 3319122, 3324672, 3329985, 3331484, 3336683, 3339178, 3342425 • Incident Log INX 883946 (Audit Action Event) • Processing Safety Meeting Minutes were provided; four separate 	<p>In Full Compliance</p>



			meetings held in order to cover all shifts. The minutes demonstrated that the importance of leak detection inspections was communicated to Process Technicians.	
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Standard of Practice 7.1: Has the operation developed an Emergency Response Plan to address potential accidental releases of cyanide and cyanide exposure incidents?

7.1.1: Does the Plan consider the potential cyanide failure scenarios appropriate for its site-specific environmental and operating circumstances, including the following, as applicable?
 b: Transportation accidents occurring on site or in close proximity to the operation?

Deficiency	Corrective Actions	Evidence Required	Evidence Verified	Compliance Status
CGM’s Emergency Response Plan does not adequately address Transportation accidents occurring on site or in close proximity to the operation.	<ul style="list-style-type: none"> Revise Emergency Response Plan to include scenarios of a transportation accident both on, and in close proximity to the operation. 	<ul style="list-style-type: none"> Revised Emergency Response Plan to include a Pre-Incident Plan (PIP) or equivalent, detailing specific response steps for the scenarios of a transportation accident on site, and separately for a transportation accident occurring in close proximity to the operation. The PIP shall include specific details on communication and liaison with local emergency services, the cyanide transporter, the cyanide producer, and other 	<ul style="list-style-type: none"> CGM Corrective Action Plan Post Audit Tracker 2025. 318002344-001 Cowal CN Code Rectification Actions Review Tracker 2025 CGM has provided a revised Hazardous Materials Management Plan, detailing Code requirements and limitations to response to internal and external transportation accidents. The plan and supporting documents have specific details on communication and liaison with 	In Full Compliance



		relevant stakeholders. If it is the intention of CGM not to directly respond to a transportation accident in close proximity to the operation, this shall clearly be defined within the PIP, along with other requirements above.	local emergency services, the cyanide transporter, the cyanide producer, and other relevant stakeholders. <ul style="list-style-type: none"> This information is sufficient to satisfy the deficiency as an alternative to a Pre-Incident Plan. Cowal Gold Operations Hazardous Materials Management Plan Document No.: HMMP-01-A ID: 00965972-001. 	
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Standard of Practice 7.4: Develop procedures for internal and external emergency notification and reporting.

7.4.3: Does the operation have a procedure for notifying ICMI of any significant cyanide incidents, as defined in ICMI’s Definitions and Acronyms document? Have all such significant cyanide incidents that have occurred been reported to ICMI?

Deficiency	Corrective Actions	Evidence Required	Evidence Verified	Compliance Status
A procedure for notifying ICMI of any significant cyanide incidents was in place for only a portion of the audit period, resulting in a potential cyanide exposure incident not be evaluated for the need to report to ICMI. Contributing to this deficiency is inadequate understanding of reporting requirements by CGM Supervisors and Management. (CGM have subsequently reported	<ul style="list-style-type: none"> Communicate ICMI reporting requirements to the Cyanide Code Champion, Processing Manager, Sustainability Manager, and CGM Senior Leadership Team and Senior Site Executives. Revise procedures and systems to ensure appropriate evaluation and timely future 	<ul style="list-style-type: none"> Training or Briefing Records confirming attendance and comprehension of ICMI reporting requirements. Revised procedures and system information demonstrating that a mechanism is in place to trigger timely evaluation of any cyanide-related incident, such that if it meets the 	<ul style="list-style-type: none"> CGM Corrective Action Plan Post Audit Tracker 2025. 318002344-001 Cowal CN Code Rectification Actions Review Tracker 2025. The Incident Reporting and Investigation Procedure has been revised, with a specific section (6.2) detailing all requirements of reporting of significant cyanide incidents to ICMI, including timing 	In Full Compliance



<p>the incident to ICMI, and it has been clarified as a near-miss incident.)</p>	<p>reporting of significant cyanide incidents to ICMI.</p>	<p>nominated criteria, it is reported to ICMI within 24 hours of occurrence.</p>	<p>requirements and a list of specific incidents.</p> <ul style="list-style-type: none"> • Training Records were provided specific to Cyanide Code requirements for the reporting of significant cyanide incidents to ICMI. The training was delivered to appropriate CGM working groups in four separate training sessions. This included a session for Senior Site Executives. 	
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Standard of Practice 7.6: Periodically evaluate response procedures and capabilities and revise them as needed.
 7.6.2: Are mock cyanide emergency drills conducted periodically?

Deficiency	Corrective Actions	Evidence Required	Evidence Verified	Compliance Status
<p>A mock cyanide emergency drill was not conducted in 2023.</p>	<ul style="list-style-type: none"> • Revise procedures and systems to trigger requirement for annual mock cyanide emergency drills. • Conduct mock cyanide emergency drill no later than 30 July 2025. 	<ul style="list-style-type: none"> • Revised procedures and system information demonstrating that a mechanism is in place to trigger the requirement for a mock cyanide emergency drill on an annual basis. • Emergency Response Drill Schedule for 2025, 2026, and 2027, demonstrating that at least one mock cyanide 	<ul style="list-style-type: none"> • CGM Corrective Action Plan Post Audit Tracker 2025. • 318002344-001 Cowal CN Code Rectification Actions Review Tracker 2025. • The CGM emergency Response Drill Schedule was provided for 2025 – 2028, confirming a mock cyanide emergency drill scheduled for each calendar year. • Mock Cyanide Emergency Drill Debrief Report provided for drill 	<p>In Full Compliance</p>



		<p>emergency drill is scheduled each year.</p> <ul style="list-style-type: none"> • Mock Cyanide Emergency Drill Debrief Report, confirming outcomes of drill have been used to evaluate potential requirement to revise emergency response plans, procedures, equipment, and training. 	<p>conducted 19 July 2025. The drill simulated a high hydrogen cyanide gas monitor reading, and subsequent emergency response and site-wide evacuation. The debrief report included a detailed evaluation of existing systems, plans, communication, equipment, and training.</p> <ul style="list-style-type: none"> • Email: Update: Annual Cyanide drill trigger - InForm or INX recurring action, CGM, M Selva, 10 December 2025 • QInForm Reference 23046 'Cowal Operations Cyanide Code Re-certification – Conduct Cyanide Emergency simulated event; due date 30 December 2026' 	
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Standard of Practice 9.2: Make appropriate operational and environmental information regarding cyanide available to stakeholders.

9.2.3: Does the operation make information publicly available on the following confirmed cyanide release or exposure incidents?

a: Cyanide exposure resulting in hospitalization or fatality?

Deficiency	Corrective Actions	Evidence Required	Evidence Verified	Compliance Status
<p>There is no clearly defined method established to make cyanide exposure incidents publicly available, resulting in inadequate evaluation of a potential cyanide exposure for the need for public disclosure.</p> <p>Contributing to the deficiency to adequately evaluate the incident for disclosure was inadequate understanding of Code disclosure requirements by CGM Supervisors and Management, as assessed in interviews and discussions during the field audit.</p>	<ul style="list-style-type: none"> • Revise procedures and systems to ensure public reporting of confirmed cyanide release or exposure incidents. • Communicate Cyanide Code public reporting requirements to the Cyanide Code Champion, Processing Manager, and Sustainability Manager. 	<ul style="list-style-type: none"> • Revised procedures and system information demonstrating that a mechanism is in place to trigger evaluation of any cyanide-related release or exposure incident, to assess potential requirement for public reporting. • Training or Briefing Records confirming attendance and comprehension of Cyanide Code public reporting requirements. 	<ul style="list-style-type: none"> • CGM Corrective Action Plan Post Audit Tracker 2025. • 318002344-001 Cowal CN Code Rectification Actions Review Tracker 2025 • The template for the Community Environmental Monitoring and Consultative Committee Meeting Minutes has been updated to include a quarterly evaluation for public reporting of confirmed cyanide release or exposure incidents. • Meeting Minutes of publicly available Community Environmental Monitoring and Consultative Committee (CEMCC) February 2025, June 2025, and September 2025, confirming that no significant cyanide-related release or exposure incident, as defined by the International Cyanide Management Code that 	<p>In Full Compliance</p>



			<p>requires public disclosure, has been recorded at CGM.</p> <ul style="list-style-type: none">• Training Records provided specific to Cyanide Code public reporting requirements delivered to appropriate CGM working groups in four separate training sessions. This included a training session for Senior Site Executives.	
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