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**Gold Fields Australia – Gruyere Gold Mine**

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**International Cyanide Management Code  
Gold Mining Operations Recertification Audit**

# ICMI SUMMARY AUDIT FINDINGS REPORT

## GOLD FIELDS AUSTRALIA – GRUYERE GOLD MINE



## ICMI SUMMARY AUDIT FINDINGS REPORT GOLD FIELDS AUSTRALIA – GRUYERE GOLD MINE

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# SUMMARY AUDIT FINDINGS REPORT

**Name of Mine**

Gruyere Gold Mine

**Name of Mine Owner**

Gold Fields (100%)

**Name of Mine Operator**

Gold Fields Australia

**Name of Responsible Manager**

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**Location Detail and Description of Operation**

The Gold Fields' Gruyere Gold Mine (GGM) is in the eastern Yilgarn region of Western Australia, approximately 200 km north-east of Laverton and 1,100 km north-east of Perth, near the western boundary of the Great Victorian Desert.

GGM is an open-pit gold mining operation with an expected mine life of approximately 9 years. The mineral resource has been defined as 148 million tonnes, grading 1.2 grams per tonne for 6.2 million ounces of contained gold.

Construction of the processing plant commenced in 2017, with commissioning and gold processing operations beginning in 2019. Ore mined from the open pit is processed through the on-site processing facility, which has a design throughput capacity of 10.0 million tonnes per annum (Mtpa).

The Gruyere operation comprises a single active open pit. The site includes a processing plant and Tailings Storage Facility (TSF). Power supply is provided by an on-site power station, supported by a gas pipeline and power distribution infrastructure, including a 12MW solar facility. Water supply is sourced from established bore fields and associated infrastructure and return water from the TSF.

All ore mined at Gruyere is processed through the on-site plant, which comprises primary crushing, Semi-Autogenous Grinding (SAG) and ball milling, an intensive leach circuit for processing gravity concentrates and carbon-in-leach (CIL) circuits. The TSF perimeter embankment is constructed using a downstream method in staged raises, enclosing an area of approximately 200ha at Stage 1 (starter) and approximately 230ha at Stage 6 (final).

Liquid sodium cyanide is delivered to the mine by road from Australian Gold Reagent's (AGR's) Kwinana production facility.

The climate of the Gruyere region is semi-arid, and temperatures range from an average minimum of 4°C in June to a maximum of 36°C in January. The average annual rainfall is 220mm. The nearest



community is Cosmo Newbery, and the Yeo Lake Nature Reserve is situated approximately 12 km from the mine.

Gold Fields Australia consolidated 100% ownership of the Gruyere operation in 2025 following the acquisition of Gold Road Resources.

### Auditors Finding

The Operation is:

- ☒ IN FULL COMPLIANCE  
☐ IN SUBSTANTIAL COMPLIANCE  
☐ NOT IN COMPLIANCE

With the International Cyanide Management Code.

This operation has experienced compliance issues during the previous three-year audit cycle which are discussed in this report under Standard(s) of Practice 7.4.

### Audit Company

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### Date(s) of Audit

The site audit was conducted inclusive of the 18<sup>th</sup> – 21<sup>st</sup> May 2026

### Audit Team

**Mining Technical Specialist** – John Miragliotta



**Lead Auditor** – Nyamdorj Barnuud

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

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



**Lead Auditor** – Nyamdorj Barnuud

08 October 2026

## 1. PRINCIPLE 1 – PRODUCTION AND PURCHASE

**Encourage responsible cyanide manufacturing by purchasing from manufacturers who operate in a safe and environmentally protective manner.**

### 1.1 Standard of Practice 1.1

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

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 1.1.

☐ NOT IN COMPLIANCE

with Standard of Practice 1.1.

The operations are in full compliance with Standard of Practice 1.1 and has purchased cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment. All cyanide received by the Gruyere operations have been received from AGR's Kwinana manufacturing facility except for two deliveries in April 2024 when cyanide was delivered from Orica's Yarwun facility due to flooding of access roads. Both manufacturing facilities have been certified in compliance with the Code for the period since Gruyere's last recertification date of 27 November 2023.



## 2. PRINCIPLE 2 – TRANSPORTATION

### Protect communities and the environment during cyanide transport.

#### 2.1 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.

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 2.1.

☐ NOT IN COMPLIANCE

with Standard of Practice 2.1.

The operation is in full compliance with Standard of Practice 2.1 requiring that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training and emergency response. Gruyere maintains records of all cyanide delivery which include chain of custody details. All cyanide has been delivered for the period of recertification by transporters who are certified as compliant with the Code.



### 3. PRINCIPLE 3 – HANDLING AND STORAGE

#### Protect workers and the environment during cyanide handling and storage.

##### 3.1 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.

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 3.1.

☐ NOT IN COMPLIANCE

with Standard of Practice 3.1.

Facilities for unloading and storing cyanide have been designed and constructed in accordance with cyanide producers' guidelines, applicable jurisdictional rules and other sound and accepted engineering practices for these facilities. The unloading and storage facilities have been designed to meet the requirements for receiving liquid sodium cyanide from the supplier and construction records are retained that verify the facility has been constructed in accordance with the supplier's requirements, the relevant legislation, applicable engineering standards and the requirements of the Code. There are no cyanide mixing facilities at Gruyere other than the mixing that occurs within the sparge isotainers during unloading to the cyanide storage tank when temporary alternative cyanide is sourced during extended period of road flooding. Documents have been retained that verify the operation considered the health, safety and environmental risks associated with the use of the sparge system and that the system was installed to meet the supplier's guidance, the requirements of an amended statutory dangerous goods license, the requirements of the Code and engineering practices.

The cyanide unloading and storage facility is located away from people and surface waters. Access to the processing plant is security controlled and fenced. The cyanide storage and transfer area is also fenced and locked.

The operation unloads liquid cyanide on a concrete surface that minimises seepage to the subsurface, and the unloading area is designed and constructed to contain, recover and allows remediation of any leakage from the tanker truck or isotainer system. The temporary use of the cyanide mini sparge system using the alternative sparge isotainers was undertaken within the cyanide storage tank secondary containment bund.

The operation has systems in place to prevent overfilling of cyanide storage tanks, and the systems are tested and maintained on a routine basis. The two cyanide storage tanks have level indicators with alarms. The alarms are audible at the cyanide unloading area and in the process control room. Interlocks are in place that do not allow the unloading of sodium cyanide if the tanks are at or above 94% capacity levels. If the mini sparge system is being used for receiving from sparge isotainers, the alarms and interlocks will prevent the operation of the sparge system when tanks are at the 94% capacity level. Sight level gauges are installed on each of the cyanide storage tanks and are visible from the filling station.

Cyanide Storage Tanks are located on a concrete surface that can prevent seepage to the subsurface. The mini sparge system includes pipes and pumps for transfer of sparged cyanide from the sparge isotainer to the cyanide storage tanks. When in use, the mini sparge storage is located within the concrete bund for the cyanide storage tanks. The secondary containments for cyanide storage tanks are



constructed of concrete that provides a competent barrier to leakage and are regularly inspected to ensure competence.

The Gruyere operation stores liquid sodium cyanide:

- a) above ground in storage tanks in the open.
- b) in the open and have vent pipes which vent any gasses within the tank at an elevation which would not pose a risk of personal exposure to HCN gas.
- c) in a dedicated reagents storage area that is fenced and locked with access to authorised personnel only.
- d) in a dedicated concrete secondary containment bund separately from incompatible materials and with adequate barriers to prevent mixing.

### 3.2 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.

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 3.2.

☐ NOT IN COMPLIANCE

with Standard of Practice 3.2.

The Gruyere operation is in full compliance with 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.

The operation receives liquid sodium cyanide in trailer mounted isotainers, or solid sodium cyanide in sparge trailer mounted isotainers, which are returned to the vendor on completion of unloading. Empty isotainers are cleaned by the delivery driver of any residue from the outside of the container and secured closed for shipment, including hose connections and couplings. The empty sparge isotainers are hosed down and cleaned by the process operators after sparging is completed. There are no empty cyanide containers that require disposal.

The operation has developed and implemented plans and procedures to prevent exposures and releases during cyanide unloading and mixing/sparging activities including:

- a) Procedures are in place for the operation and maintenance of hoses, valves and couplings. The operation's maintenance planning system includes maintenance inspection and replacement schedules for hoses, valves and couplings for the liquid sodium cyanide facility. The procedures and work instructions for the temporary use of the cyanide mini sparge system include maintenance inspections required to be completed on the sparge tank, hoses, valves and couplings prior to the use of the equipment.
- b) The liquid sodium cyanide isotainers are trailer mounted and are not lifted or moved from the truck trailer at any time during unloading at the Gruyere facility. For the temporary use of the mini-sparge, the cyanide sparge isotainers are crane lifted from the truck trailer into the cyanide storage tank secondary containment area adjacent to the temporary location of the mini-sparge unit. The operation developed specific job hazard analysis and work instructions for the lifting of the sparge isotainers to minimise the risk of damage to the isotainers during transfer.
- c) There is no stacking of cyanide containers undertaken at Gruyere.



- d) The procedures include the need for immediate cleanup of any spills of cyanide during transfer of liquid cyanide from isotainers and during the use of the temporary mini sparge unit;
- e) The cyanide unloading and temporary sparge operations procedures provide for safe unloading of liquid cyanide and sparging by requiring appropriate personal protective equipment. The procedures require a spotter to be onsite observing unloading/sparging at all times and the unloading/sparging is observed remotely from the process plant control room by closed circuit TV.
- f) Colorant dye is added to the liquid sodium cyanide and cyanide sparge isotainers by the suppliers before delivery.



## 4. PRINCIPLE 4 – OPERATIONS

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

#### 4.1 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.

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 4.1.

☐ NOT IN COMPLIANCE

with Standard of Practice 4.1.

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

Written plans and procedures have been developed for cyanide facilities including: the milling circuit, where process water includes tailings return water; the gravity circuit and Intensive Leach Reactor (ILR); Carbon in Leach (CIL) and elution circuits; gold room; tailings thickening; tailings pipeline, tailings storage facilities (TSF) including the seepage collection system and return water pipeline; process water pond; cyanide storage tanks; and, the cyanide unloading facility. The operation does not have mixing facilities or heap leach.

The operation's plans and procedures identify and account for the assumptions and parameters on which the facility design was based and applicable regulatory requirements as necessary to prevent or control cyanide releases and exposures consistent with applicable requirements. The operation's plans have: identified and defined the requirements and locations for HCN gas monitoring; outlined the process for NaCN monitoring and control in the leach circuit; defined the operational control for the cyanide unloading and storage facilities; and, defined the design measures for containment and seepage control for the tailings storage/transfer and return water systems.

The design criteria for the process facilities and tailings storage are defined with reference to compliance with the Code and regulatory requirements for storage and protection of surface and groundwater. The design criteria for the tailings storage defines the equipment and construction requirements for containment of tailings in accordance with regulatory approvals. The operation's tailings management plan identifies and accounts for the management of tailings over the life of mine with the ability to contain storm water; maintain minimum operational freeboard as defined by regulatory requirements; and, ability to withstand design earthquake loading. The objectives for tailings management refer specifically to the operation's Operating License, Cyanide Code, Global Industry Standard for Tailings Management (GISTM) and applicable Australian Guidelines (ANCOLD). Plans have been amended in response to required contingencies including the temporary change to supply of cyanide due to road flooding.

The operation's plans and procedures describe the standard practices necessary for safe and environmentally sound operations including the Cyanide Management Plan, the Tailings Management



Plan and the procedures for Preparation for a Significant Rainfall Event. The operation's plans and procedures describe the inspections to be undertaken to ensure compliance with the Code. The operation has developed plans and procedures for preventative maintenance activities of cyanide facilities.

The operation has developed and implemented procedures to review changes to production processes, operating practices and cyanide facilities. The procedures require assessment to identify, control and manage changes to hazards and risks or adverse effects that may result from the change and include any change that may increase the potential for cyanide release and worker exposures. The change procedures require the operation to identify and implement measures to protect worker health and safety and the environment from a change. The procedures describe the requirement to assess changes relating to: changes to plant and equipment, including the acquisition of new equipment; changes to procedures or standard work practices; changes to operating or maintenance practices; organisational changes; changes to legislative requirements; and, specifically changes to cyanide processes, facilities and associated infrastructure. The management of change procedure requires the operations environment and safety personnel to sign off any plant or process changes affecting cyanide management or cyanide code compliance. The operation is effectively implementing its change management procedures and is managing the potential risks/hazards arising from these changes.

The Gruyere operation has cyanide management contingency procedures for non-standard operating situations where there may be potential for cyanide exposure and risk. The operation has operational plans in place for events which may lead to an upset in the facility water balance due to, for example, extreme rainfall event or power outage. Gruyere has developed a range of contingency procedures where inspections identify issues that require non-standard operations to minimise risk of cyanide exposures to workers or impacts to the environment. Plans have been developed to describe the contingencies that will be implemented during periods of temporary cessation of operations.

The Gruyere operation inspects the following at unloading, storage and process areas:

- a. Tanks holding cyanide solutions for structural integrity and signs of corrosion and leakage. A range of inspections are scheduled and completed at prescribed frequencies for cyanide storage tanks, CIL and leach tanks, tailings hopper and thickener.
- b. Secondary containments provided for tanks and pipelines for physical integrity, the presence of fluids and available capacity, and to ensure that any drains are closed and, if necessary, locked, to prevent accidental releases to the environment. Secondary containment inspections are completed by operator shift inspections, monthly operator area inspections and scheduled monthly mechanical inspections.
- c. Leak detection and collection systems at ponds, as required in the design documents. Leak detection inspection/monitoring occurs quarterly for leach and CIL tanks (under tank floor), high strength cyanide pipelines (continuous electronic leak detection and at the process water and sedimentation ponds (groundwater monitoring bore).
- d. Pipelines Pumps and valves for deterioration and leakage include shift operator inspections, monthly tailings area pipework inspection, monthly tailings area slurry pipework inspection, 3-monthly tails line inspection, 3-monthly thermographic inspections and 2-yearly tails pipe elbow inspection.
- e. Ponds and impoundments for the parameters identified in their design documents as critical to their containment of cyanide and solutions and maintenance of the water balance, such as available freeboard and integrity of surface water diversions. These include daily shift operational inspections, monthly area inspections for the process water pond and sedimentation pond, integrity of surface water diversions and freeboard



levels, monthly and 6-monthly area inspection of the tailings storage facility and annual audit of the tailings storage facility by a suitably qualified engineer.

The Gruyere operations inspect cyanide facilities at frequencies defined in the procedures and plans. Maintenance inspection frequencies are described in the maintenance strategies that supports the preventative maintenance management system. The inspection frequencies have been developed in consideration of the need to maintain functionality of equipment within design parameters for cyanide facilities. The frequency of maintenance inspections is defined by equipment specifications, risk and experience/observation from past inspections, and it is the auditor's opinion that the frequency of inspections is sufficient to maintain functionality within design parameters.

Inspections are documented and include the date of inspection, the name of the inspector and any observed deficiencies. Any corrective actions taken as a result of the inspections are documented and records have been retained. Maintenance inspection records are retained in the preventative maintenance management system with time stamped records of completion. Corrective actions are referred to in the inspection records either as a reference to a maintenance work order number or an action management system record.

Gruyere continues to implement its preventative maintenance system to ensure that equipment and devices function as necessary for safe cyanide management. Preventive maintenance inspections conducted by maintenance personnel provide emphasis on the physical integrity of equipment and instruments. Preventative maintenance records are documented and retained.

The Gruyere operation has the necessary emergency power to prevent unintentional releases and exposures in the event its primary source of power is interrupted. Battery back-ups are in place essential lighting and electrical instrumentation in the process plant and reagents area. Routinely maintained emergency diesel generator backup is available onsite for operation of pumps and equipment to prevent overtopping and containment of tanks and ponds.

#### 4.2 Standard of Practice 4.2

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

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 4.2.

☐ NOT IN COMPLIANCE

with Standard of Practice 4.2.

The Gruyere operation is in full compliance with Standard of Practice 4.2. The operation implements programs to evaluate cyanide use in the process plant and adjusts addition rates to minimise use. The target cyanide concentration is reviewed daily to ensure optimisation of gold recovery while maintaining tailings Weak Acid Dissociable cyanide (WAD CN) concentrations within the applicable limits. Cyanide concentrations are continuously monitored via online monitoring in the leach circuit and at the tailings thickener. The operation continues to implement programs that seek to further minimise cyanide use such as reduction of cyanide concentrations for carbon-stripping in the elution circuit.



#### 4.3 Standard of Practice 4.3

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

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 4.3.

☐ NOT IN COMPLIANCE

with Standard of Practice 4.3.

Gruyere uses and maintains a Probabilistic Water Balance Model (PWBM) to prevent TSF overfilling and to manage water storage ponds. The model outputs are updated for each quarter to reflect seasonal rainfall, forecast plant throughput. The PWBM outputs include the predicted cumulative tailings stored in the TSF, predicted TSF storage capacity, predicted remaining TSF capacity, and measured remaining TSF capacity.

The model includes the following factors in a reasonable manner for the facilities and environment: tailings deposition rates, a storm rainfall event (1 in 100 year, 72-hour event), precipitation, evaporation and seepage rates representing local conditions, un-diverted run-on from upgradient areas, solution losses in addition to evaporation and seepage and potential power outages.

Ponds and impoundments at Gruyere operation are designed to maintain adequate freeboard above the maximum design storage capacity determined by water balance calculations. The TSF freeboard is designed with a minimum total freeboard of 500 mm, including 300 mm of operational freeboard, maintained continuously. Process Water Ponds have 300 mm freeboard requirement and are operated to maintain the specified level. The Process Water Pond and Raw Water Ponds are equipped with on-line level detection instrumentation to monitor capacity and freeboard levels.

At Gruyere, the TSF freeboards are inspected twice a day through the daily dam inspections. The daily inspections also check the tailings and return water pipes, tailings deposition, the location and size of the decant water, erosion along the embankment perimeter, the integrity of the liner and tailings, and return water pump operations. In addition to the daily TSF inspections, the operation has established Critical Operating Parameters (COP) and associated Trigger Action Response Plans (TARP) to ensure TSF safe operation and required monitoring requirements.

The operation uses both long-term precipitation data (Laverton weather station data) held by government agencies and on-site collected rainfall data to compare results and revise operating practices as required.

#### 4.4 Standard of Practice 4.4

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

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 4.4.

☐ NOT IN COMPLIANCE

with Standard of Practice 4.4.



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

All open water ponds at Gruyere, including the tailings storage facility, the process water pond and the decant return pond, have WAD CN concentrations below 50mg/l and therefore, measures to prevent access by wildlife and livestock are not necessary.

The operation has demonstrated that the cyanide concentration in open water in the TSF, decant return pond and process water pond do not exceed 50mg/l WAD CN. Sampling and analysis of the spigot and decant occurs daily by the processing department, and sampling of the Process Water Pond and Raw Water Pond occurs weekly. The results from daily analysis of the tailings shows no results that exceed 50mg/l WAD CN over the period of recertification. The operation has an online WAD CN analyser which monitors cyanide in the tailings slurry prior to being pumped to the TSF. The WAD CN analyser is alarmed within an initial high alarm at 46mg/l and a High-High alarm at 50mg/l. The Gruyere operation has developed and implements procedures to manage WAD CN concentration in open waters which have been effective in ensuring that open waters at the operation do not exceed 50mg/L WAD CN.

Gruyere maintains WAD cyanide concentrations at or below 50 mg/L in open waters to protect wildlife. Trained technicians conduct daily TSF wildlife inspections within three hours of sunrise and record any dead or distressed animals. During the recertification period, only one rabbit mortality was observed, while bird activity was regularly recorded without fatalities. The monitoring data demonstrates that cyanide management of open water at the TSF is effective in preventing significant wildlife mortality.

#### 4.5 Standard of Practice 4.5

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

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 4.5.

☐ NOT IN COMPLIANCE

with Standard of Practice 4.5.

The operation is in Full Compliance with Standard of Practice 4.5: Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

The Gruyere operation has no direct discharge to surface water from cyanide facilities. The mine is located in arid region with no permanent surface water in the immediate vicinity. The operation has undertaken opportunistic monitoring of surface drainages that flow immediately following rainfall events where samples are analysed for a range of parameters including WAD CN. Analysis has not detected any cyanide concentrations from this monitoring. There has been no indirect discharges surface water from the operations cyanide facilities which have caused cyanide concentrations in surface water to rise above levels protective of a designated beneficial use for aquatic life.

#### 4.6 Standard of Practice 4.6

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

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 4.6.

☐ NOT IN COMPLIANCE

with Standard of Practice 4.6



The operation implements water management measures to manage seepage to protect the beneficial uses of groundwater beneath and immediately downgradient of the operation. Seepage to groundwater from the operation of the tailings storage facility extends below and downgradient of the facility and is managed through seepage recovery infrastructure. A seepage management strategy has been developed and implemented to manage groundwater elevation beyond the boundary of the TSF with the aim of stabilising and eventually reversing a trend of rising groundwater levels. There are no identified beneficial users of the groundwater in the vicinity of the TSF with the nearest pastoral well located some 4km from the Gruyere Gold Mine which is not affected by the operations of the mine. There are no known groundwater dependent ecosystems or receptors near the TSF.

The operation monitors for cyanide in groundwater downgradient from the cyanide facilities and can demonstrate that the concentrations of WAD cyanide and total cyanide in groundwater at compliance points below or downgradient of the facility are at or below protective levels. There have been no limits for cyanide concentrations in groundwater established by the regulator for the operations although reporting of WAD CN and total cyanide concentrations is required.

The operation does not use mill tailings as underground backfill.

The operation has not caused cyanide concentrations of groundwater to rise above levels protective of beneficial use but continues to implement its seepage management strategy and water management program with the intention of reversing groundwater mounding that has occurred outside the perimeter of the TSF.

#### 4.7 Standard of Practice 4.7

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

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 4.7.

☐ NOT IN COMPLIANCE

with Standard of Practice 4.7.

Spill containment measures are provided for all cyanide unloading facilities, cyanide storage tanks, the two thickeners, the ILR area, CIL and elution area process tanks and other areas of the plant by the installation of impervious concrete secondary containment bunds. There are no mixing tanks installed at the Gruyere operations, but cyanide sparging has occurred for temporary supply of cyanide when delivery of liquid sodium cyanide has been interrupted. When in use, the temporary cyanide sparge unit is located within the cyanide tank secondary containment bund to ensure spill prevention and containment.

The cyanide storage tanks are located on concrete plinths integrated into the concrete bunding. Thickeners, elution columns and ILR tanks are all located within concrete bunding. The Leach and CIL tanks are located on concrete ring beams with an integrated poly-welded HDPE liner and associated leak detection.

Secondary containments for cyanide unloading, storage, and process tanks are designed to exceed Code requirements by containing the volume of the largest tank and associated piping, plus runoff from a 1-in-100-year, 72-hour storm event. In 2020, an independent engineering assessment verified containment capacities through detailed surveys, measurements, and volume calculations. Following the review, containment capacities for the process plant and reagent storage areas were increased by 10% as an added contingency, and a final engineering verification confirmed compliance with the Standard of Practice. In 2024, a risk assessment of a temporary cyanide mini-sparge supply system confirmed that the cyanide storage area secondary containment continued to meet required capacity criteria. No



subsequent changes have affected the independently verified containment volumes, and the secondary containment system remains compliant with Code requirements.

The operation has procedures in place and which are being implemented to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in a secondary containment area. Procedures describe the operation of sump pumps, inspection of secondary containments, preparation for major storm events and removal and clean-up of spills within secondary containments. The operation has sump pumps in place within secondary containments to return slurry or process water to the circuit.

Spill prevention or containment measures are provided for all cyanide process solution pipelines to collect leaks and prevent releases to the environment. The piping of reagent strength cyanide from the cyanide unloading area to the cyanide storage tanks is contained within the secondary containment for cyanide storage and unloading area. The reagent strength pipelines that deliver cyanide from the storage area to the elution column, leach tanks, CIL tanks and ILR are double skinned PVC. The reagent strength concentrated cyanide solution pipelines are fitted with electronic leak detection instrumentation.

Periodic inspections are conducted addressing spill prevention, including operations pipeline leak detection inspections, maintenance pipeline and valve inspections, and specialist thermographic testing of pipelines and pipeline fittings. The tailings and decant return pipelines have leak detection via differential flow measurement at source and delivery ends of the pipeline.

There are no areas where cyanide pipelines present a risk to surface water.

All tanks and pipelines that contain cyanide solutions are constructed of materials that are compatible with cyanide and high pH conditions. This has been verified through quality assurance (QA) and quality control (QC) documents and verification of design basis.

#### 4.8 Standard of Practice 4.8

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

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 4.8.

☐ NOT IN COMPLIANCE

with Standard of Practice 4.8.

The Gruyere operation implemented quality control and quality assurance processes for cyanide facilities construction and modifications to existing facilities to ensure cyanide facilities are constructed according to accepted engineering standards and specifications. The reviewed quality control and quality assurance program documents addressed material suitability and adequate soil compaction for storage tanks, earthen and synthetic liner installations for ponds, and oversight of cyanide facility construction in the past and during this recertification period.

The Gruyere retained relevant QC/QA program records such as engineering design documents, QC/QA programs implemented during construction, laboratory analysis for materials tested and as-built drawings for past cyanide facilities construction and modifications.



Appropriately qualified personnel reviewed Gruyere's cyanide facilities' construction and provided documentation that the facilities have been built as proposed and approved. The appropriately qualified personnel include certified engineers, construction project managers, and the vendor's engineers.

The Stage 5 TSF wall lifting project, a cyanide facility modified during this recertification period, was designed and constructed by reputable engineering firms, and a quality assurance process was in place during the project construction. The project undertook materials suitability testing for the TSF wall lift construction. Any changes to the project design or specifications were reviewed on a case-by-case basis by the project designer and Gold Fields Australia for sign-off. The project completion reports were signed off by suitably qualified engineers. Quality assurance and quality control documents were retained by Gruyere for the latest modifications to the TSF.

#### 4.9 Standard of Practice 4.9

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

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 4.9.

☐ NOT IN COMPLIANCE

with Standard of Practice 4.9.

The operation has developed written standard procedures for monitoring activities. The monitoring procedures describe the methods required for sampling and analysis, measures required to ensure personal safety including use of personal protective equipment, quality assurance and quality control requirements, locations, frequency, calibrations, recording and data management. Procedures for monitoring at Gruyere are applied by the process technicians, maintenance personnel, environment and safety personnel and emergency response teams.

Sampling and analytical protocol have been developed by appropriately qualified personnel including the Environmental Superintendent, Senior Metallurgist, Laboratory Manager and external experts where relevant. The personnel developing the monitoring procedures have appropriate tertiary qualifications in engineering, chemistry, metallurgy, and environmental science.

The Gruyere monitoring procedures specify how and where samples should be taken, sample preservation techniques, chain of custody procedures, shipping instructions, cyanide species to be analysed and quality assurance and quality control requirements for cyanide analyses. Chain of custody forms and field data sheets are included as attachments to the procedure and the requirements for chain of custody records, sample labelling, sample dispatch records and field data sheets are detailed. Shipping instructions are included in the relevant sample dispatch forms for each procedure. The sampling conditions at the time of monitoring are required to be recorded in the field data sheets. The field sheets require the monitoring personnel to enter specific information regarding sampling conditions including weather conditions and general observations such as wildlife activity and/or anthropogenic influences.

The frequency of statutory required monitoring is prescribed by regulators but also internally defined for non-statutory monitoring. Monitoring frequencies are adequate to characterise the medium being



monitored and identify changes in a timely manner. The operations at Gruyere have revised monitoring frequencies in response to changes to risk or in response to incidents.



## 5. PRINCIPLE 5 – DECOMMISSIONING

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

### 5.1 Standard of Practice 5.1

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

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 5.1.

☐ NOT IN COMPLIANCE

with Standard of Practice 5.1.

An overarching Mine Closure Plan is developed to describe and schedule activities for all the mining, processing and support infrastructure. The Mine Closure Plan is developed to meet the requirements of the Western Australian mining regulator, the Department of Mines, Petroleum and Exploration (DMPE), and establishes the plan to achieve mine closure objectives for the mine voids, mine waste landforms, tailings storage facilities (TSF), processing plant, mine operation infrastructure and service infrastructure at the completion of mine life. The closure and decommissioning of the processing plant is generally described in the Mine Closure Plan but is further detailed in the Cyanide Decontamination and Decommissioning Plan (CDDP). The CDDP describes and schedules the activities to be carried out for decontamination, decommissioning and removal, where necessary, of cyanide facilities at the process plant including tailings pipelines, cyanide storage areas, process trains, process ponds, affected soil and groundwater that may be associated with these cyanide facilities.

The Mine Closure Plan includes a mine closure schedule whereby key milestones have been developed based on planning activities associated with closure. The CDDP includes an implementation schedule for closure activities related to cyanide facilities. The implementation schedule outlines the works required during operations and leading up to closure, the closure activities at completion of processing and the post closure activities that extend for a period of 2-years following cessation of processing. The CDDP includes a requirement for review and update as necessary every two years during operations, including a revision of cost estimates. The Gruyere Mine Closure Plan is required to be reviewed and updated every 3 years to accommodate changes to the mine plan and updates to the closure cost estimates. Both plans have been reviewed and updated in accordance with this schedule.



## 5.2 Standard of Practice 5.2

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

The operation is ☒ IN FULL COMPLIANCE  
☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 5.2.  
☐ NOT IN COMPLIANCE

with Standard of Practice 5.2.

The Gruyere operation has developed an estimate of the cost to fully fund third-party implementation of the cyanide related decommissioning measures as identified in the Mine Closure Plan and the Cyanide Decontamination and Decommissioning Plan (CDDP). The Gruyere operation has estimated costs associated with decontamination and decommissioning of cyanide facilities as defined in the CDDP.

The operation reviews and updates the cost estimates annually and when revisions to the decommissioning plans are made that effect the cyanide related decommissioning activities. The cost estimates for full third party funding of cyanide related decommissioning and closure activities described in the CDDP are revised annually.

The Gruyere operation contributes funds to a financial mechanism, the Mining Rehabilitation Fund, which is approved and administered by the Western Australian Department of Mines, Petroleum and Exploration (DMPE) for the decommissioning and closure of Gruyere Gold Mine, including cyanide related decommissioning activities. Gruyere has contributed the required funds for its mining tenements in accordance with the Mining Rehabilitation Fund Act for the period from 2023 to 2025.



## 6. PRINCIPLE 6 – WORKER SAFETY

### Protect workers' health and safety from exposure to cyanide.

#### 6.1 Standard of Practice 6.1

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

☒ IN FULL COMPLIANCE

The operation is

☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 6.1.

☐ NOT IN COMPLIANCE

in full compliance with Standard of Practice 6.1.

The operation has developed comprehensive Standard Operating Procedures (SOPs) for cyanide-related tasks—including unloading, plant operations, confined-space entry, equipment decontamination, cyanide sampling and monitoring, emergency response and spill clean-up. Each SOP defines the specific hazards, prescribes control measures and outlines the step-by-step method for safe completion. If a cyanide-related activity is not already covered by an SOP, personnel must prepare a Job Hazard Analysis (JHA) using a standard template that highlights cyanide as a critical hazard, evaluates risks for each job step and records the agreed-upon controls with signatures from all workers involved.

The SOPs stipulate that workers conduct pre-work inspections covering emergency response facilities and use personal protective equipment commensurate with cyanide exposure risk levels. The reviewed procedures provide evidence that cyanide-related tasks require pre-work inspections covering emergency response facilities, safety showers/eyewash stations, oxygen equipment, calibration and functionality of HCN monitors and atmospheric testing for confined spaces. The reviewed cyanide-related task SOPs also cover physical workplace inspections such as spill detection, bund inspections, access and egress checks, and slip/trip hazards.

Workers are involved in reviewing and updating health and safety procedures. A central document called the "Processing Work Instructions Review List" tracks every procedure, identifies the responsible custodian and records review status for each work crew. Work area supervisors review and update the procedures and consult the relevant personnel for feedback; both the supervisor and the consulted workers then sign off the revised procedure.

All versions are stored electronically with details of changes, approvals and future review dates, ensuring transparency and continual improvement.



## 6.2 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.

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 6.2.

☐ NOT IN COMPLIANCE

in full compliance with Standard of Practice 6.2.

Gruyere maintains a target pH of 9.8 in mill circuits to minimise the formation of hydrogen cyanide (HCN) gas. pH is manually sampled four times daily and monitored continuously through process tank probes. The operation calibrates pH probes weekly and monthly, and pH deviations are corrected by adjusting lime and cyanide dosing rates. No cyanide mixing activities occur at Gruyere. A risk assessment identified locations and activities where workers could be exposed to HCN above acceptable limits. Personnel working in cyanide areas must wear personal HCN monitors and follow the Managing HCN Gas Procedure. In addition, 14 fixed HCN monitors with visual and audible alarms are installed and monitored by control room operators. Auditors confirmed both fixed and personal monitoring systems were in use during the audit.

Cyanide exposure high-risk areas are clearly signposted at the Gruyere operation. Procedures specify required responses to HCN alarms, including evacuation requirements at specified HCN level readings and alarms and radio notifications from the control room when alarm thresholds are reached. Supervisor notification and incident investigation are required when trigger levels occur.

Gruyere uses personal HCN detectors that require bump testing every eight days and automatic calibration every 180 days. Failed detectors are serviced by the equipment supplier. Fixed HCN monitors are maintained monthly through maintenance system work orders, including calibration and accuracy verification. Calibration records are retained and available for audit purposes.

Warning signs are installed at cyanide handling, storage, processing, and tailings areas. The signage identifies cyanide hazards and communicates controls such as prohibitions on eating, drinking, smoking, and open flames, as well as requirements to wear personal HCN monitors. The Cyanide Management Plan requires all liquid cyanide deliveries to contain a rose-coloured dye. Gruyere's contracted cyanide supplier adds the dye before delivery, and site audit inspections confirmed the presence of dyed cyanide at process addition points.

Safety showers, eyewash stations, and dry-powder fire extinguishers are strategically located throughout cyanide handling areas. Monthly inspections verify equipment functionality, while external servicing of fire extinguishers occurs every six months. Safety shower operation is also monitored by control room personnel. Cyanide storage tanks, process tanks, and pipelines are clearly labelled with their contents and flow directions. High-strength cyanide pipelines are painted lilac and marked appropriately, while tanks display hazard and emergency information. Routine inspections ensure labels remain visible and maintained.

Current Safety Data Sheets (SDS) are available in both hardcopy and electronic formats through the online SDS folders, first-aid information, and printed cyanide safety materials located in cyanide areas and inspected monthly to ensure they remain current and accessible to personnel.



Cyanide-related incidents are managed under the site's Incident Management Standard and reporting procedures. Incidents are documented by workers and supervisors, entered into the incident management system, and investigated. Corrective actions are tracked to completion to ensure issues are effectively addressed.

### 6.3 Standard of Practice 6.3

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

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 6.3.

☐ NOT IN COMPLIANCE

compliance with Standard of Practice 6.3.

Gruyere has established and maintains cyanide emergency response equipment in accordance with Section 6.3 of the Cyanide Management Plan. During the audit, five OxyViva oxygen/resuscitator units were observed at strategic locations throughout the processing plant, with additional units available in the ambulance, fire truck and emergency response light vehicle. Five intravenous type cyanide antidote kits were available and stored at both the Site Medical Centre and Workers' Village Medical Centre. Continuous medical coverage is maintained through qualified site medics, ensuring a trained medic is always available to administer intravenous cyanide antidotes. Medical coverage is supported through contractor arrangements when required. Emergency communication systems include mandatory two-way radios for personnel working in cyanide exposure areas.

The operation conducts regular inspections and maintenance of emergency medical equipment to ensure readiness and compliance with manufacturer requirements. Audit verification confirmed cyanide antidotes were within expiry dates and stored appropriately. Antidote kits include hydroxocobalamin (Cyanokit), intravenous administration equipment and supporting instructions. OxyViva units and other medical equipment are inspected weekly and monthly basis. Inspection records are maintained electronically, providing evidence of ongoing monitoring and equipment integrity.

Gruyere has developed and implemented a site-specific Emergency Response Management Plan (ERMP) supported by cyanide-specific Pre-Incident Plans (PIPs). The plans address a broad range of potential cyanide-related scenarios, including cyanide exposure injuries, transportation incidents, cyanide spills, fires and explosions, tailings facility failures, uncontrolled seepage, hydrogen cyanide gas releases, pond overtopping events, hazardous energy isolation, and post-incident decontamination activities. The PIPs define potential incident locations, required response equipment, and emergency response actions, providing a structured framework for managing cyanide-related emergencies. Gruyere's Emergency Response and Management Plan adequately details emergency responses, for example, putting casualties under an emergency shower, removing contaminated clothing, oxygen administration, antidote use etc., for cyanide exposure victims via HCN inhalation, absorption of cyanide and cyanide solutions through the skin and eyes, and ingestion.

The operation maintains a comprehensive emergency response capability comprising 30 trained Emergency Response Team (ERT) members, with a minimum of six available on every roster. All ERT personnel are first-aid trained, enhancing the site's ability to respond effectively to cyanide incidents. The operation maintains two continuously staffed medical centres providing 24-hour emergency



coverage, with medical facilities located approximately eight minutes from operational areas. Dedicated emergency response resources include a fire truck, ambulance, forward command vehicle and emergency response light vehicle. Site medics are registered nurse trained and authorised to administer intravenous cyanide antidotes, ensuring an appropriate level of medical preparedness for cyanide exposure emergencies.

Due to its remote location, Gruyere maintains sufficient on-site capability to assess and treat cyanide exposures and does not depend on external medical facilities for immediate cyanide emergency treatment. Where off-site medical evacuation is required, the Royal Flying Doctor Service (RFDS) provides aeromedical transport. The operation also has access to RFDS doctors on a 24-hour on-call basis, ensuring continuous access to specialist medical advice and support when required.



## 7. PRINCIPLE 7 – EMERGENCY RESPONSE

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

### 7.1 Standard of Practice 7.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is ☒ IN FULL COMPLIANCE  
☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 7.1.  
☐ NOT IN COMPLIANCE

in full compliance Standard of Practice 7.1.

The Gruyere operation has established a site-specific Emergency Response Management Plan (ERMP) that identifies cyanide-related emergencies requiring response and management actions. The Emergency Management Plan considers cyanide-related failure scenarios relevant to Gruyere's operating conditions and environmental risks.

The Plan covers potential cyanide risks that could result in accidental releases or personnel exposure. These include:

- Cyanide transportation accidents
- Liquid cyanide spills occurring outside bunded containment areas.
- Failure of tailings facilities or process water discharge pipelines.
- Catastrophic hydrogen cyanide (HCN) gas releases.
- Tailings dam failures and uncontrolled seepage events.
- Cyanide-related injuries and exposures.

For each of these scenarios, the ERMP includes dedicated Pre-Incident Plans (PIPs) that define the emergency response actions, communication protocols, containment measures, medical response requirements and recovery processes.

The Emergency Response Management Plan and associated Pre-incident plans for cyanide release describe specific response procedures such as clearing site personnel from the area of exposure, use of cyanide antidotes and first aid measures, controlling releases at their source and containment, assessment, mitigation and future prevention of releases.

### 7.2 Standard of Practice 7.2

Involve site personnel and stakeholders in the planning process.

The operation is ☒ IN FULL COMPLIANCE  
☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 7.2.  
☐ NOT IN COMPLIANCE

in full compliance with Standard of Practice 7.2.

As the Gruyere operation is in a remote location, its workforce is the primary stakeholder group involved in cyanide emergency response planning. Employee input is obtained through participation in the Emergency Response Team (ERT), feedback from emergency drills, site-wide communications, safety meetings, and reviews of emergency response procedures. The operation maintains around 30 trained ERT members from different departments, with managers ensuring personnel are available for training and emergency duties. Auditors confirmed workforce consultation during the Emergency Response Management Plan review, including discussions on the Emergency Tone Activation System. Employees are also consulted through regular Health and Safety Representative meetings.

Gruyere has developed a self-sufficient capability to manage on-site cyanide emergencies and does not rely on external organisations for cyanide-specific incident response. However, the operation has arrangements to cooperate with external agencies for broader emergency situations or medical evacuations. These organisations include Department of Fire and Emergency Services (DFES), members of the Northern Goldfields Mutual Aid Agreement, the Shire of Laverton Local Emergency Management Committee (LEMC), and the Royal Flying Doctor Service (RFDS).

There are no nearby communities that could be impacted by cyanide incidents originating from the Gruyere operation due to its remote location.

### 7.3 Standard of Practice 7.3

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

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 7.3.

☐ NOT IN COMPLIANCE

in full compliance with Standard of Practice 7.3.

The operation maintains a fully self-sufficient cyanide emergency response capability and does not rely on external entities to respond to cyanide-related emergencies.

The operation's Emergency Response Plan (ERP) and Cyanide Management Plan meet the cyanide emergency preparedness requirements by clearly defining emergency response leadership, responsibilities, resources, training, and procedures.

Key elements include:

- **Emergency Leadership:** The Site Senior Executive (SSE) has overall responsibility for emergency management, supported by the OHS Manager and an identified alternate SSE with authority to mobilise resources and activate emergency responses.
- **Emergency Response Structure:** The Emergency Response Management Plan (ERMP) identifies Emergency First Responders, the Emergency Response Team (ERT), On-Scene Command (OSC), and the Emergency Management Team (EMT). The ERT includes trained specialists such as the Site Medic, Emergency Response Team Leader, and designated ERT members.
- **Training:** Emergency responders receive comprehensive training covering HAZMAT, cyanide emergency response, advanced first aid, fire operations, confined space rescue, breathing apparatus, road crash rescue, and other specialist emergency response disciplines.



- **Communication and Call-Out Procedures:** Emergency activation processes include dedicated emergency phone and radio channels, supervisor notification pathways, and 24-hour contact lists maintained within the site's emergency management system.
- **Roles and Responsibilities:** The ERMP clearly assigns duties and responsibilities to emergency personnel, including On-Scene Command, First Responders, ERT Leaders, Site Medics, and ERT members.
- **Emergency Equipment:** A wide range of emergency response equipment is maintained onsite, including fire and rescue vehicles, ambulance, HCN monitors, breathing apparatus, hazardous materials PPE, rescue equipment, first aid resources, gas detectors, and cyanide-specific response equipment.
- **Equipment Inspection and Maintenance:** Emergency equipment is managed through the Maintenance Management System, with weekly ERT inspections and preventive maintenance programs covering cyanide response infrastructure, HCN monitors, alarms, safety showers, eyewash stations, tanks, pipelines, and bunding systems.
- **External Support:** While the operation collaborates with organisations such as DFES, RFDS, mutual aid partners, and local emergency management committees for broader emergency and medical support, it does not depend on external parties for cyanide emergency response. Cyanide transport incidents are managed by AGR/Orica transport emergency teams with site support as required.

#### 7.4 Standard of Practice 7.4

Develop procedures for internal and external emergency notification and reporting.

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 7.4.

☐ NOT IN COMPLIANCE

in full compliance with Standard of Practice 7.4.

The Gruyere emergency response plan and related procedures include requirements for notifying internal (management and onsite medical team) and external stakeholders (i.e. communities, media, regulators and local hospital) in the event of cyanide-related incidents and emergencies, as required. The Emergency Response and Management Plan includes both procedures and contact information for notifying and engaging external medical providers, for example, the Royal Flying Doctor Service, Laverton Hospital and other external emergency and health services.

The Cyanide Management Plan includes a commitment to report significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document, to ICMI as part of the external reporting requirements. Potential cyanide incident investigation is also triggered when an incident is reported in the incident management system. During the recertification period, Gruyere notified the ICMI of cyanide incidents onsite, i.e. bird deaths and worker exposures to cyanide, within 24 hours and provided investigation reports within 7 days.



## 7.5 Standard of Practice 7.5

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

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 7.5.

☐ NOT IN COMPLIANCE

are in full compliance with Standard of Practice 7.5.

Liquid cyanide spills are managed under site procedures and recovered using pumps, then returned to plant secondary containment bunds or suitable containers. Solid cyanide spills are recovered manually or with equipment and stored in lined bulk bags or sealed containers. If spilled outside bunded areas, solids may be neutralised with dry sand or ferrous sulphate before recovery.

Contaminated soils are treated using approved chemicals such as ferrous sulphate and hypochlorite. Soils affected by spills are excavated to a depth of 50 mm, tested for cyanide, and repeatedly treated until WAD CN concentrations are below 10 ppm.

Spill clean-up debris is bagged and managed through post-incident neutralisation and decontamination processes. Neutralised soil meeting the cleanup criterion (<10 ppm WAD CN) may be disposed of in the TSF, while recovered cyanide solutions may be returned to the process system.

No external drinking water supplies are present near the Gruyere operation that could be affected by a cyanide release.

Procedures prohibit the use of sodium hypochlorite, ferrous sulphate, and hydrogen peroxide where these chemicals could enter surface water, groundwater, or dry drainage channels that may contain water.

The Emergency Response Management Plan (ERMP) requires environmental monitoring following cyanide spills to confirm contamination has been effectively remediated. Monitoring focuses on soil testing after clean-up, with contaminated soil excavated and tested using cyanide test kits. The key parameter monitored is WAD CN with a remediation target of less than 10 ppm. If results exceed the target, further neutralisation and re-testing are required until compliance is achieved.

Sampling is primarily conducted in soil directly beneath the spill area; no specific requirements are identified for monitoring surface water as there is no permanent surface water within proximity of the GGM plant and TSF that could be affected by a spill. Gruyere's Pre-Incident Plan 31 specifies the groundwater monitoring requirements to monitor cyanide-containing seepage during potential tailings dam failure / uncontrolled seepage scenarios.

The Gruyere operation maintains adequate stocks of ferrous sulphate, including a labelled supply located adjacent to the cyanide unloading area for spill response.



## 7.6 Standard of Practice 7.6

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

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 7.6.

☐ NOT IN COMPLIANCE

with Standard of Practice 7.6.

Gruyere regularly reviews and updates both its Emergency Response Management Plan (ERMP) and Cyanide Management Plan, with responsibility assigned to the Operations ESO and Senior Metallurgists, respectively. Since the 2023 recertification audit, both plans have been revised three times, with all changes and update histories documented. Emergency Response Coordinator and Emergency Response Team contact details are also maintained and updated frequently.

The operation has conducted mock cyanide emergency response drills annually covering a range of realistic cyanide incident scenarios. The drills were conducted in real-life situations, involving voluntary ERT members and site Emergency Response Coordinators who are expected to respond to cyanide incidents and tested the entire cyanide emergency response process from the initial emergency callout to the close-out of the response process. Each drill was reviewed, and outcomes were formally documented.

Both the ERMP and Cyanide Management Plan include processes for the evaluation and revision of emergency response procedures. The ERMP requires formal debriefings after drills or emergency events to capture lessons learned and identify improvements to training, procedures, equipment, and resources. Similarly, the Cyanide Management Plan mandates reviews following incidents, process or equipment changes, or recommendations arising from observations, supervisor requests, or drill outcomes.

Overall, the emergency response and cyanide management documents have been regularly reviewed and updated since the 2023 recertification audit, ensuring they remain current and effective.



## 8. PRINCIPLE 8 – TRAINING

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

### 8.1 Standard of Practice 8.1

Train workers to understand the hazards associated with cyanide use.

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 8.1.

☐ NOT IN COMPLIANCE

in full compliance with Standard of Practice 8.1.

All processing plant personnel, contractors, emergency response personnel, and others who regularly access the plant must complete mandatory Cyanide Awareness training. The cyanide awareness training covers cyanide materials present at the operation, cyanide hazards, symptoms of cyanide exposure, locations of cyanide storage and handling areas, potential cyanide exposure risk areas, PPE use, and actions required if hydrogen cyanide levels reach 4.7ppm and 10ppm. Gruyere operation does not use solid cyanide, and employees working in areas where liquid cyanide exposure may occur are trained to use emergency shower and eyewash stations as part of their task-procedure training. Employees must complete cyanide hazard awareness refresher training annually and cyanide task-specific training every two years.

Training records are automatically maintained in the learning management systems, and annual refresher training is required, with automated reminders and supervisor escalation for overdue training. The primary cyanide hazard recognition training is Gold Fields Australia's Cyanide Awareness Interactive Presentation. Evidence reviewed indicates that Gruyere has an effective system for tracking employee training and competency records.

Gruyere uses online-based training management platforms to monitor training compliance and issue weekly refresher reminders when training expires, with escalation to supervisors where required. Electronic training records are retained on the online platform.

### 8.2 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.

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 8.2.

☐ NOT IN COMPLIANCE

in full compliance with Standard of Practice 8.2.

Gruyere has established a comprehensive cyanide training and competency management framework to ensure personnel involved in cyanide-related activities are appropriately trained, assessed, and monitored. In addition to general cyanide hazard recognition training, employees complete role-specific training programs that incorporate relevant procedures, work instructions, competency requirements,



and compliance obligations for operational areas including Reagents, CIL, Elution, Gold Room, and the Tailings Storage Facility.

Training is delivered through a combination of cyanide awareness inductions, online procedure training, buddy-system area orientations, and practical on-the-job training. Employees are required to complete prerequisite online training before site mobilisation and must successfully complete area-specific orientations, procedure training, and competency assessments before undertaking cyanide-related tasks independently. Personnel working in areas with potential HCN gas exposure are required to complete additional HCN gas management training.

The operation applies a structured, competency-based training approach for new personnel. Training is delivered by experienced subject matter experts, including supervisors, leading hands, and experienced operators, and follows a staged progression from lower-risk to higher-risk cyanide tasks. Advancement is authorised by work area supervisors once the required competence has been demonstrated.

Assessment of competency is primarily achieved through direct observation of task performance. Trainers and supervisors demonstrate tasks, assess personnel undertaking the activities, and formally document competency through procedure review checklists, buddy-system records, and training sign-off documentation. Evidence reviewed confirmed that employees are not permitted to work unsupervised until the required training and competency assessments have been completed.

Refresher training is conducted at prescribed intervals, generally every two years or sooner following procedural changes. Training records are maintained within the learning management system, with automated reminders issued to personnel and supervisors to ensure compliance. Supervisors also utilise system-generated reports to identify training gaps and manage refresher requirements.

The audit confirmed that training records are effectively maintained and retained, including induction records, operator training plans, competency assessments, and task-specific training documentation. Records contain details of the employee, trainer, training date, topics covered, and competency outcomes, providing evidence of a robust system for training delivery, competency verification, and record management for cyanide-related activities.

### 8.3 Standard of Practice 8.3

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

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 8.3.

☐ NOT IN COMPLIANCE

in full compliance Standard of Practice 8.3.

Personnel involved in cyanide unloading, processing, and maintenance activities are trained in cyanide release response procedures, including decontamination, first aid, and emergency actions. Training is delivered through a suite of operational procedures covering cyanide delivery and unloading, cyanide sparging, leaching operations, equipment decontamination, WAD cyanide response, and management of hydrogen cyanide (HCN) gas.



The operation requires personnel undertaking tasks with potential cyanide exposure to wear personal HCN gas monitors. Procedures define response actions at 4.7ppm and 10ppm HCN concentration thresholds and provide task-specific emergency response requirements, including emergency communications, equipment shutdown, alarm activation, and safe evacuation procedures for higher-risk activities such as cyanide unloading and sparging.

The Emergency Response Team (ERT) maintains capability to respond to cyanide-related incidents through formal training, weekly competency-based exercises, annual cyanide emergency drills, and external specialist training as required. ERT members are trained in cyanide incident response, rescue, decontamination, oxygen resuscitation equipment use, first aid, and resuscitation techniques, with competencies maintained through a structured training program.

The operation has established a self-sufficient on-site cyanide emergency response capability. While no external organisations have a direct role in site cyanide emergency response, the operation maintains relationships with relevant external stakeholders, including DFES, RFDS, the Northern Goldfields Mutual Aid Agreement members, and the Laverton Local Emergency Management Committee, to support wider emergency response or medical evacuation requirements.

Refresher training on cyanide exposure and release response is conducted regularly through monthly training schedules, supplemented by weekly ERT training and emergency exercises. Training records are maintained electronically within the learning management systems and include employee and trainer names, training dates, topics covered, and evidence of competency. Review of records confirmed that training documentation is retained and contains the required training details for inductions and operational competency programs.



## 9. PRINCIPLE 9 – DIALOGUE

### Engage in public consultation and disclosure.

#### 9.1 Standard of Practice 9.1

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

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 9.1.

☐ NOT IN COMPLIANCE

fully compliant with Standard of Practice 9.1.

The operation provides stakeholders with information on its cyanide management practices and engages with them regarding their concerns. Gruyere provides various opportunities for stakeholders to communicate issues of concern regarding the management of cyanide. The operation captures complaints and grievances from stakeholders through a Community Grievance Management Procedure which requires all issues of concern to be documented and addressed in a timely manner. The operation maintains a Stakeholder Engagement Plan with an associated Public Consultation and Disclosure Program and details of Grievance Mechanisms.

The operation has provided information regarding cyanide use to identified stakeholder groups through publication of articles, and information shared with the native title groups in quarterly meetings regarding operational matters.

#### 9.2 Standard of Practice 9.2

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

☒ IN FULL COMPLIANCE

The operation is ☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 9.2.

☐ NOT IN COMPLIANCE

is fully compliant with Standard of Practice 9.2.

Gruyere has developed written descriptions of how its activities are conducted and how cyanide is managed and these descriptions are available to communities and other stakeholders. Information is provided to stakeholders on activities which describes how cyanide is managed through documents and presentations provided in quarterly meetings with traditional owner groups, Annual Environmental Reports and Gold Fields Corporate Sustainability Reports.

The Gold Fields corporate Sustainability Report is available via the Gold Fields website and includes Gruyere specific data on environmental and social performance relevant to cyanide management including details of cyanide incidents and spills.

There is not a significant proportion of population which is illiterate hence a verbal dissemination of material has not been deemed necessary.



The operation makes information publicly available on the following confirmed cyanide release or exposure incidents:

- a) Cyanide exposure resulting in hospitalization or fatality
- b) Cyanide releases off the mine site requiring response or remediation
- c) Cyanide releases on or off the mine site resulting in significant adverse effects to health or the environment
- d) Cyanide releases on or off the mine site requiring reporting under applicable regulations
- e) Releases cause applicable limits for cyanide to be exceeded

Any cyanide incident that triggers one or more of the above criteria is reported in the Gold Fields Sustainability reporting data specific to the operation here: <https://www.goldfields.com/sustainability-data.php>

